

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos.: 50-206/93-35, 50-361/93-35, and 50-362/93-35
License Nos.: DPR-13, NPF-10, and NPF-15
Licensee: Southern California Edison Company (SCE)
Irvine Operations Center
23 Parker Street
Irvine, California 92718
Facility Name: San Onofre Nuclear Generating Station (SONGS), Units 1, 2,
and 3
Inspection at: San Onofre Site, San Diego County, California
Inspection Conducted: December 13 - 17, 1993
Inspector: Arthur D. McQueen 1/7/94
A. D. McQueen, Emergency Preparedness Analyst Date Signed
Approved by: Robert J. Pate 1/20/94
Robert J. Pate, Chief Date Signed
Safeguards, Emergency Preparedness, and
Non-Power Reactor Branch

SUMMARY:

Areas Inspected: Routine inspection to address Shift Staffing and Augmentation, Knowledge and Performance of Duties, and the Operational Status of the Emergency Preparedness Program. Inspection procedures 82205, 82206, and 82701 were used as guidance.

Results: The results of this inspection indicated that the licensee was maintaining its emergency preparedness program and achieving program goals. Emergency preparedness training and facility maintenance appeared to exceed minimum regulatory requirements.

DETAILS

1. Persons Contacted

Licensee Personnel

- *C. Anderson, Supervisor, Site Emergency Planning (SEP)
- *K. Bellis, Manager, Nuclear Affairs and Emergency Planning (NA&EP)
- *R. Calsbeck, Computer Based Training (CBT) Specialist
- *B. Culverhouse, Emergency Planning Specialist
- *J. Dale, EP Training Instructor
- *R. Douglas, Engineer, Onsite Licensing
- *K. Fowler, Engineering Aide
- *R. Garcia, Emergency Planning Engineer
- *R. Giroux, Nuclear Licensing Engineer, Onsite Nuclear Licensing
- D. Hall, Shift Superintendent
- *F. Liu, Emergency Planning Engineer, SEP
- *G. Lulias, Engineer, Quality Assurance (QA)
- *S. Martorano, Engineering Training Supervisor
- R. Moreno, Training Officer, San Onofre Fire Department
- *J. Reeder, Manager, Nuclear Training
- *M. Whatley, Site Emergency Planning
- *M. Zenker, Lead Engineer, Emergency Planning
- *W. Zintl, Manager, Site Emergency Preparedness

The above individuals denoted with an asterisk were present during the December 17, 1993, exit interview. The inspector also contacted other members of the licensee's emergency preparedness, administrative, and technical staff during the course of the inspection.

NRC Personnel

- A. McQueen, Emergency Preparedness Analyst, NRC
- R. Pate, Chief, Safeguards, Emergency Preparedness and Non-Power Reactor Branch
- J. Russell, Resident Inspector, NRC

2. Functional or Program Areas Inspected

The licensee appeared to be maintaining their previous level of performance in the following areas and their program seemed adequate to accomplish their objectives.

a. Shift Staffing and Augmentation (MC 82205)

Shift staffing and augmentation were reviewed with the Site Emergency Planning Supervisor. It was indicated that no substantive changes have occurred in the emergency planning staff or the emergency response organization (ERO) since the last routine EP inspection at the site. The licensee had in place administrative mechanisms to meet goals for shift staffing and augmentation, to include use of the "Red Badge" protected area access system to insure ERO personnel meet annual training requirements in a timely manner. Augmentation drills have been

conducted periodically (at least quarterly) to insure that augmentation goals can be met.

A review of the "Training Status Of Emergency Response Personnel" indicated that there may be very little depth in augmentation capability for some ERO assignments. This conclusion resulted from a comparison of the Emergency Plan Training Program Curriculum and a current printout of the Training Status roster. It was noted that some ERO assignments have only two or three persons indicated as currently trained to perform those functions and of the few personnel listed in some assignments, the same individuals were listed against more than one assignment. It was indicated to the licensee that this could potentially make it difficult to sustain emergency response operations for an extended period.

No violations or deviations were identified in the review of this program area.

b. Knowledge and Performance of Duties (MC 82206)

Requirements of this inspection module were reviewed in conjunction with the Core inspection module review of emergency preparedness training. A training program is in place to provide initial position specific emergency preparedness training to ERO members, followed up with annual recurring training to insure reinforcement of knowledge of duties. Review of the emergency plan training program procedure and a "Training Status Of Emergency Response Personnel" roster dated December 14, 1993, indicated that amount and type of training received appears appropriate to meet requirements and commitments. A Shift Superintendent was interviewed to verify that he understood his emergency authorities and responsibilities as site Emergency Coordinator. He demonstrated such understanding and the capability to identify and classify emergency events promptly and correctly when presented with emergency event scenarios.

The licensee makes training opportunities available for local offsite support personnel and provides them with training literature for reference and use. An annual medical emergency drill was conducted on July 21, 1993, involving offsite support personnel. The drill was evaluated by the Federal Emergency Management Agency-(FEMA). The formal drill critique was reviewed as part of this inspection.

No violations or deviations were identified in the review of this program area.

c. Operational Status of the Emergency Preparedness Program (MC 82701)

(1) Emergency Plan and Implementing Procedures

Twenty one Emergency Plan Implementing Procedures (EPIP), which had been revised since the last routine inspection, were reviewed during this inspection.

- EPIP S0123-VIII-10, Emergency Coordinator Duties, Revision 5-8, dated July 2, 1993.
- EPIP S0123-VIII-10.1, Station Emergency Director Duties, Revision 1-6, dated July 2, 1993.
- EPIP S0123-VIII-10.2, Corporate Emergency Director Duties, Revision 0-5, dated July 2, 1993.
- EPIP S0123-VIII-30, Operations Leaders Duties, Revision 6-8, dated October 14, 1993.
- EPIP S0123-VIII-30.1, Emergency Planning Coordinator Duties, Revision 9-5, dated August 2, 1993.
- EPIP S0123-VIII-30.5, Shift Communicator Duties, Revision 3-4, dated November 18, 1993.
- EPIP S0123-VIII-30.6, EOF Communicator Duties, Revision 9-5, dated August 2, 1993.
- EPIP S0123-VIII-40, TSC Health Physics Leader Duties, Revision 7-7, dated July 2, 1993.
- EPIP S0123-VIII-40.1, OSC Health Physics Coordinator Duties, Revision 8-1, dated September 9, 1993.
- EPIP S0123-VIII-50, Technical Leader Duties, Revision 7-1, dated July 2, 1993.
- EPIP S0123-VIII-50.2, EOF Technical Leader Duties, Revision 1-1, dated July 2, 1993.
- EPIP S0123-VIII-60, Security Leader Duties, Revision 6-6, dated September 9, 1993.
- EPIP S0123-VIII-60.1, OSC Security Coordinator Duties, Revision 5, dated September 10, 1993.
- EPIP S0123-VIII-60.2, EOF Security Supervisor Duties, Revision 0, dated July 2, 1993.

- EPIP S0123-VIII-70, Administrative Leader Duties, Revision 5-5, dated July 2, 1993.
- EPIP S0123-VIII-70.2, EOF Administrative Coordinator Duties, Revision 0, dated May 2, 1993.
- EPIP S0123-VIII-80, Emergency Group Leader Duties, Revision 5-4, dated July 2, 1993.
- EPIP S0123-VIII-0.100, Maintenance and Control of Emergency Planning Documents, Revision 0, dated August 19, 1993.
- EPIP S0123-VIII-0.200, Emergency Plan Drills and Exercises, Revision 2-4, dated July 27, 1993.
- EPIP S0123-VIII-0.201, Emergency Plan Equipment Surveillance Program, Revision 4-2, dated September 9, 1993.
- EPIP S0123-VIII-0.301, Emergency Telecommunications Testing, Revision 5-1, dated July 2, 1993.

Changes to the implementing procedures had apparently been reviewed, approved and distributed in accordance with approved licensee procedures and NRC requirements before implementation. No apparent degradations in site emergency preparedness were noted in the marked or indicated changes.

(2) Emergency Facilities, Equipment, Instrumentation, and Supplies

An inspection tour was made of each of the emergency response facilities (ERFs), which included spot checking of various equipment items, instrumentation, and supplies. ERFs appeared well maintained and ready for emergency use. Spot checks were made at random of radiation monitoring and respiratory equipment at each ERF. All selected items were verified as being in calibration or had been appropriately inspected on a scheduled basis. It was apparent that key facilities and equipment are adequately maintained and continue to meet NRC requirements.

No violations or deviations were identified in the review of this program area which appeared in some areas to exceed minimum requirements.

(3) Organization and Management Control

The emergency planning staff organization and the emergency response organization (ERO) were reviewed with the Site

Emergency Planning Supervisor. It was indicated that no substantive changes have been made in the EP staff or the ERO since the last routine EP inspection at the site.

No violations or deviations were identified in the review of this program area.

(4) Training

See also sections 2.a and 2.b above. The licensee's key emergency response personnel have been properly trained as required and appear to understand their emergency responsibilities. The licensee uses a combination of computer based training, renewed annually, and participation in emergency exercises and drills. Licensee critiques for 1993 drills and exercises were reviewed as part of the inspection, to include:

(a) Annual Emergency Exercise

The 1993 annual emergency exercise was conducted on September 15. Participation included the licensee ERO, State, and local government agencies. This exercise was evaluated by the NRC (Inspection Report 93-21, dated October 13, 1993). No violations of NRC requirements or exercise weaknesses were identified in that inspection. Offsite participation was evaluated by the Federal Emergency Management Agency (FEMA) Region IX, which is issuing a separate inspection report. FEMA also evaluated offsite activities during the annual Medical Emergency Drill on July 21, 1993. The licensee critique of that medical emergency drill, dated August 31, 1993, was reviewed during this inspection and appeared appropriate to the exercise activities.

(b) Quarterly Emergency Response Drills

Licensee Emergency Drill Critique Reports were reviewed for the following drills:

- March 17, 1993, Emergency Drill critique Report, dated April 2, 1993.
- May 12, 1993, Emergency Drill Critique Report, dated June 18, 1993.
- August 11, 1993, Emergency Drill Critique Report, dated August 23, 1993.

Drill critique findings in all cases appeared appropriate to drill objectives and activities.

(c) Fire Department Training Drills

It was verified that the licensee has conducted all fire drills required by the Emergency Plan. Specifically, the emergency plan requires one joint drill annually with the U.S. Marine Corps Camp Pendleton Fire Department and one per quarter for the San Onofre Fire Department. The licensee in fact has conducted three drills with the Camp Pendleton Fire Department (one for each shift) and at least one drill per calendar quarter for each shift of the San Onofre Fire Department. Of the 12 drills conducted during 1993, at least one per shift was announced and at least one was unannounced.

No violations or deviations were identified in the review of this program area and it was noted that the licensee appeared in some areas of EP training to be exceeding minimum requirements.

(5) Independent Reviews and Audits

(a) Annual Emergency Preparedness Audit.

During the period November 23, 1993, through December 2, 1993; Site Quality Assurance conducted the annual emergency preparedness audit and issued Audit Report SCES-321-93, dated December 1993. The audit report was reviewed as part of this inspection. The report indicated that "No significant deficiencies were identified" as a result of the audit; however three minor discrepancies were noted and all three were "field corrected." These discrepancies were indicated as having no "significant impact on the overall quality of the program." Findings and corrective actions appeared appropriate and in accordance with regulatory requirements.

(b) Quality Assurance (QA) Surveillances.

Sixteen QA Surveillance Reports for 1993 EP activities surveillances conducted by Site Quality Assurance were reviewed during the inspection. The surveillance reports and resulting findings and actions were identified in and incorporated into the annual audit above.

No violations or deviations were identified in the review of this program area.

3. Exit Interview

On December 17, 1993, at the conclusion of the site visit, the inspector met with the licensee representatives identified in paragraph 1 above to summarize the scope and the preliminary results of this inspection. The licensee was provided with details of the findings indicated above. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during the inspection.