

DEC 31 1981

IE HQ FILE COPY

Docket Nos. 50-269, 50-270 and 50-287

Duke Power Company
ATTN: Mr. W. O. Parker, Jr.
Vice President, Steam Production
P. O. Box 2178
Charlotte, NC 28242

Gentlemen:

SUBJECT: EMERGENCY PREPAREDNESS APPRAISAL

To verify that licensees have attained an adequate state of onsite emergency preparedness, the Office of Inspection and Enforcement is conducting special appraisals at each power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements, but also for effecting improvements in NRC requirements and guidance.

During the period of August 24 - September 3, 1981, the NRC conducted an appraisal of the emergency preparedness program at Oconee Nuclear Station. Areas examined during this appraisal are described in the enclosed report (50-269/81-13, 50-270/81-13, 50-287/81-13). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

An emergency preparedness deficiency identified during this appraisal is addressed in Appendix A. With regard to this item, discussions with your staff on December 21, 1981 indicated that the corrective action was completed by December 1, 1981, as committed.

In addition, the findings of this appraisal indicate that there are other areas that should be evaluated and considered for improvement in your emergency preparedness program. These areas are summarized in Appendix B, "Preparedness Improvement Areas".

In conjunction with the aforementioned appraisal, emergency plans for your facility were reviewed. The results of this review indicate that certain deficiencies exist in your emergency plan. These are addressed in Appendix C, "Emergency Plan Deficiencies." Your corrective actions are to be incorporated into the Site

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Emergency Plan and Procedures as appropriate. The Plan changes for correcting each deficiency are to be provided to this office and Emergency Preparedness Licensing Branch upon issuance or, at the latest, within 120 days of the date of this letter.

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendix B may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) days of the date of this letter, describing the results of your consideration of each of the items in Appendix B. This description is to include, (1) steps which have been taken, (2) steps which will be taken, and (3) a schedule for completion of actions for each item. This request is made pursuant to Section 50.54 (f) of Part 50, Title 10, Code of Federal Regulations.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Should you have any questions concerning this appraisal, we will be pleased to discuss them with you.

Sincerely,



James P. O'Reilly
Regional Administrator

Enclosures:

1. Appendix A, Emergency Preparedness Deficiency
2. Appendix B, Preparedness Improvement Areas
3. Appendix C, Emergency Plan Deficiencies
4. Inspection Report No. 50-269/81-13,
50-270/81-13, 50-287/81-13

cc w/encl:

J. E. Smith, Station Manager

bcc w/encl:
Document Management Branch
State of South Carolina
Office of Inspection and Enforcement
Division of Emergency Preparedness

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APPENDIX A

EMERGENCY PREPAREDNESS DEFICIENCY

Based on the results of the NRC's appraisal of the Oconee Nuclear Station Emergency Preparedness Program conducted August 24-September 3, 1981, the following deficiency was identified (references are to Sections in OIE Report No. 50-269/81-13, 50-270/81-13, 50-287/81-13 and the related standard of 10 CFR 50.47).

Post-Accident sampling capability (Section 5.4.2.4; 50.47(b)(9)):

Existing procedures for primary coolant sampling under accident conditions did not adequately include: (1) exposure assessment, (2) identification of special equipment and/or techniques, and (3) relationship of sample results to emergency action levels.

APPENDIX B

PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Oconee Nuclear Station Emergency Preparedness Program conducted August 24-September 3, 1981, the following items should be considered for improvement: (References are to the Section in OIE Report No. 50-269/81-13, 50-270/81-13, 50-287/81-13.)

1. Establishing a mechanism to ensure retraining in the areas of emergency planning is accomplished satisfactorily (3.2).
2. Improving the provisions for obtaining a primary coolant sample under accident conditions (4.1.1.5).
3. Improving the provisions for obtaining a containment air sample under accident conditions (4.1.1.6).
4. Improving the provisions for obtaining gas and particulate effluent samples under accident conditions (4.1.1.7).
5. Improving the provisions for obtaining liquid effluent samples under accident conditions (4.1.1.8).
6. Assuring that both offsite assembly areas will be available and accessible (4.1.2.1).
7. Providing the emergency kits at the offsite assembly areas (4.1.2.1).
8. Securing a written agreement for the use of Daniel High School (or equivalent facility) as offsite decontamination location (4.1.2.3).
9. Stocking decontamination kits at the offsite decontamination locations (4.1.2.3).
10. Establishing a list of supplies to be drawn from the station supply room in the event onsite decontamination is to be accomplished (4.1.2.3).
11. Justifying that the offsite source of meteorological data is considered representative of the Oconee site (4.2.1.4).
12. Justifying the use of unmodified wind speed and wind direction from the 46 m level of the primary tower (4.2.1.4).
13. Installing a system to make severe weather information available to control room operators (4.2.1.4).
14. Evaluating and resolving communications problems discovered during drills and exercises. (4.2.3).

15. Marking ceiling panels in the TSC and EOF to identify the location of emergency telephone plugs (4.2.3).
16. Performing operational checks of emergency communications as provided by procedure PT/O/B/2000/04 (4.2.3).
17. Installing posters in the plant describing the station emergency signals and required actions (4.2.3).
18. Titling the various station procedures related to the emergency plan such that the scope and content of the procedures are clearly identified (5.1).
19. Change procedure HP/O/B/1009/13 to include requesting weather conditions as part of information required from National Weather Service; alternating communications checks among shifts; and recording concurrent onsite meteorological data with offsite data (5.4.2).
20. Change Station Directive 3.8.5 to include use of 15-minute averaged meteorological data; clarification of the procedure for the case when primary or rivertower data is not available; and clarification of the 22.5 degree wind shift criterion to determine need for assessment (5.4.2).
21. Providing appropriate disposition of data sheets utilized by the environmental monitoring teams (5.4.2.1, 5.4.2.2).
22. Developing procedures which contain methods for analyzing high-activity primary coolant samples in accordance with NUREG-0737 (5.4.2.5).
23. Upgrading the procedures for the sampling and analysis of containment atmosphere and gas/particulate effluents under accident conditions (5.4.2.6, 5.4.2.7, 5.4.2.8, 5.4.2.9).
24. Upgrading the procedures for the sampling and analysis of high-activity liquid effluents (5.4.2.10, 5.4.2.11).
25. Provide for informing personnel of radiological conditions which could prevent them from reaching and/or remaining at their respective assembly areas during a Station Assembly. (5.4.3.2).
26. Providing procedures which delineate the composition and individual responsibilities of search and rescue teams (5.4.3.3).
27. Identifying, in the Crisis News Group Implementing Plan, your coordination with the news information function of other organizations, including rumor information (5.4.7).
28. Documenting the resolution of deficiencies/improvements identified in drills and exercises (5.5.2).
29. Identifying specifically the person responsible for the review and distribution of the emergency plan and procedures (5.5.4).

30. Providing a means to ensure phone numbers on call lists are maintained correct (5.5.4).

APPENDIX C

EMERGENCY PLAN DEFICIENCIES

Based on the results of the NRC's review of the Oconee Nuclear Station Emergency Plan, the following deficiencies have been identified: (References in parentheses are to criteria of NUREG-0654, Rev 1.)

1. (B.4) The Plan does not clearly specify which responsibilities may not be delegated to other elements of the emergency organization.
2. (B.5) Table 5.0-1 of the Plan does not satisfy staffing criteria as follows: (1) no on-shift capability is provided for mechanical maintenance, electrical maintenance, or radiation protection; (2) no augmentation is provided before 60 minutes; and (3) no senior management augmentation is provided.
3. (B.8) The Plan does not specify contractor and private organizations which would assist in an emergency.
4. (B.9) No letter of agreement for fire-fighting support is included in the Plan.
5. (D.1) The emergency action levels listed in the Plan do not identify the parameter values and equipment status for each emergency class.
6. (E-6) The Plan does not describe the means and time required for notifying and providing prompt instructions to the public within the plume exposure pathway EPZ.
7. (G-1, G-2) The Plan does not identify the means for the actual dissemination of information to the permanent and transient population, address the special needs of the handicapped, or provide for the annual dissemination of information.
8. (G.5) The Plan does not provide for annual dissemination of information to the news media.
9. (H.1) The Plan does not describe nor provide for a TSC which meets the criteria of NUREG-0696.
10. (H.2) The Plan does not describe nor provide for an EOF which meets the criteria of NUREG-0696.
11. (H.8) The Plan does not describe nor provide for meteorological instrumentation and procedures which satisfy the criteria of Appendix 2 to NUREG-0654.
12. (H.9) The Plan contains insufficient information on supplies available in the OSC.

13. (I.2) Resources to provide initial values and continuing assessment of emergency conditions are available; however, postaccident sampling capability and containment radiation monitoring is not addressed in the plan.
14. (I.3) The techniques for determining the source term of release of radioactive material within the plant system is not addressed nor is the technique for determining the magnitude of release based on plant system parameter and effluent monitors.
15. (I.4) The licensee has not established in the Plan, the relationship between effluent monitor readings and onsite and offsite contamination for various meteorological conditions.
16. (I.5) The Plan does not indicate that meteorological data can be assessed by the EOF. Also, the plan does not address making meteorological data available to the State.
17. (I.6) The Plan does not address a method for determining the release rate/projected dose if instrumentation is offscale or inoperable.
- 18.(I.10) The licensee has not established, in the Plan, a means for relating various measured parameters to dose rate for key isotopes and gross radioactivity measurements. In addition, the Plan does not address estimating integrated dose from projected and actual dose rates and comparing these numbers with protective action guides.
19. (I.5) Accountability within 30 minutes of the onset of an emergency is not addressed in the Plan.
20. (J.8) The evacuation time estimates provided in the Plan have been evaluated (NUREG/CR-1856) and rated as poor. The time estimates should provide the information identified in and meet the criteria of Appendix 4 to NUREG-0654.
- 21.(J.10) Maps included in the Plan are not legible and, therefore, it is not apparent that maps provide information on evacuation routes, radiological sampling and monitoring points, shelter areas and population distribution. The bases for the choice of recommended protective actions is not discussed in the Plan.
22. (K.3) The Plan does not address provisions for 24-hours per day capability to determine doses received by emergency workers. The distribution of self-reading and permanent reading dosimeters is not addressed. Reading of personnel dosimeters and record keeping for emergency workers is not addressed.
23. (K.5) Action levels for determining the need for decontamination is not addressed in the Plan. Decontamination of supplies, instruments, and equipment and provisions for waste disposal is not addressed.

24. (K.6) Contamination control including area access control, drinking water and food supplies and returning areas and items to normal use is not addressed.
25. (L.1) The capability for evaluation of radiation exposure and uptake and preparedness to handle contaminated individuals at the Oconee Memorial Hospital is not addressed.
26. (M.4) The method for periodically estimating total population exposure is not addressed.
27. (O.3) The Plan does not specify that first aid training is equivalent to Red Cross Multi-Media.
28. (O.4) The specialized training and retraining programs contained in this criteria are not addressed in the Plan.
29. (P.1) Provisions for the training of individuals responsible for emergency planning are not addressed.