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SUBJECT: Responds to IFI identified during insp repts 50-269/93-18,
 50-270/93-18 & 50-287/93-18 on 930614-17. Corrective
 actions: reviewed activities, briefing areas & layouts.

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DUKE POWER

August 17, 1993

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Subject: Oconee Nuclear Site
Docket Nos. 50-269, -270, -287
Inspection Report 50-269, -270, -287/93-18

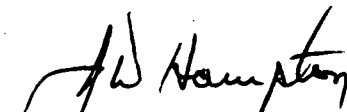
Gentlemen:

During the Oconee Nuclear Site full-scale exercise conducted June 14-17, 1993, one exercise weakness was cited in the subject Inspection Report. Pursuant to the provision of 10 CFR 50, Appendix E, Section IV.F, I am submitting a written response (Attachment 1) to the weakness identified in the subject Inspection Report.

Also, within the Inspection Report two Inspector Follow-up Items (IFI) were identified. During the exit meeting held on June 17, two potential weaknesses were discussed. One potential weakness (evacuation criteria and procedures for non-essential personnel onsite during a radiological release) was changed to an IFI after review at the Region. The other IFI (fire response capabilities during emergency plan implementation and any corrective actions to improve responsiveness) was not discussed during the exit. Attachments 2 and 3 document our response to these items. Attachment 4 contains information regarding statements that were made in the Inspection Report.

If you have any questions concerning this response, please contact Coleman Jennings at (803) 885-3294.

Sincerely,


J. W. Hampton

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Q PDR

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Document Control Desk
August 17, 1993
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cc: Mr. S. D. Ebnetter, Regional Administrator
U. S. Nuclear Regulatory Commission, Region II

Mr. L. A. Wiens, Project Manager
Office of Nuclear Reactor Regulation

P. E. Harmon
Senior Resident Inspector
Oconee Nuclear Site

Attachment 1

Exercise Weakness 50-269, 270, 287/93-18-01: Failure of the EOF Staff to notify the Emergency Director of suspect information (offsite dose rates), prior to its transmission to offsite agencies.

Discussion:

The Oconee annual exercise was a "licensee-only" exercise where the State of South Carolina was participating by receiving messages and follow-up phone calls. Both Oconee and Pickens counties were set up to receive messages. The counties activated the sirens during the drill scenario. Limited exchange of information existed between the Oconee emergency facilities and the State of South Carolina, and Pickens and Oconee counties.

The Radiological Assessment Manager did not discuss suspect data with the EOF Director. However, in a real event or full scale exercise with all agencies participating, this lack of notification to the EOF Director would have had minimal, if any, negative impact due to the following:

1. Radiation monitor readings and meteorological data were available to the State of South Carolina and the NRC through the Emergency Response Data System. This is the same data that the EOF was using to develop dose calculations.
2. Had the S.C. Department of Health and Environmental Control been participating in the exercise, the fact that a radiation monitor reading was suspect would have been passed to them by the State Communicator in the EOF Radiological Assessment Area, not by the EOF Director.
3. Had the NRC been participating, the suspect radiation monitor reading would have been provided to the NRC via the Health Physics Network, not by the EOF Director.
4. At the time the message form was completed, the suspect data was all that the Radiological Assessment Manager had to complete the message form in Section 13. The information would still have been provided on the message form in the same manner. Communication of suspect data would have already been communicated to the State of South Carolina via phone communications by communicators in the EOF Radiological Assessment area.

Procedure RP/O/B/1000/20, Emergency Operations Facility Director Procedure, will be revised to require that a group discussion among managers be held once every hour during an Alert classification and once every half-hour for Site Area Emergency and General Emergency classification. Information exchange will be enhanced by conducting these group discussions. This procedure will be revised by September 1, 1993.

Attachment 2

IFI 93-18-02: Review the licensee's evaluation of fire response capabilities during emergency plan implementation and any corrective actions to improve responsiveness in a future inspection.

Discussion:

We disagree with two areas of this Inspector Follow-up Item.

Section 9.c of the Inspection Report, Operational Support Center, references Licensee Exercise Objective B.23 and is related to fire brigade response. This is incorrect. There was not an objective in this exercise related to fire brigade response (refer to the Exercise Objectives Attachment of the report). In addition, the coding used by the evaluator (B.23), is not currently used by the licensee in identifying exercise objectives. If this had been an exercise objective, the appropriate code would have been F.c.

Fire brigade response capabilities were not affected by emergency plan implementation. As stated in the report, Fire Brigade personnel from Maintenance did respond in a timely manner to the scene. Additional Fire Brigade members from I&E and Radwaste also responded to the scene in a timely manner. A total of 9 Fire Brigade members were available to respond to the situation prior to the arrival of the 5 Operations Fire Brigade members from the OSC. All responders arrived at the scene dressed in turnout gear and prepared to fight a fire. One of these responders 'assumed command' of the Fire Brigade, consistent with his training, and proceeded to direct the activities of the other responders as the Fire Brigade Leader. During this time frame, the acting Fire Brigade Leader was in radio communication with the control room and had access to licensed operator expertise if needed. Once the licensed operator responded to the scene from the OSC, a turnover was conducted and he assumed command as the Fire Brigade Leader. The Fire Brigade response was timely, efficient and effective.

It should be recognized that at no time during this portion of the exercise was an NRC evaluator located at the scene to observe the response of Fire Brigade personnel.

The Fire Brigade response program is described in the Design Basis Document and is an NRC evaluated program. As a part of this program, after initial Fire Brigade training, all licensee Fire Brigade members receive "Fire Brigade Leader Training" every other year as part of their continuing training. This training is provided to ensure that an adequate and timely response to a fire is available. In addition to this training, Fire Brigade equipment lockers are located throughout the plant to enhance the timely response capabilities of the Fire Brigade.

Attachment 2
(continued)

It is our opinion that the issue is not related to the Fire Brigade response capabilities, but rather, the dispatching of teams from the OSC. This was a problem identified by the drill participants and controller/evaluators during the critique of the exercise. The Critique Summary Report discussed this problem and its apparent root cause. A corrective action recommendation was made to review OSC activities related to team dispatch, team briefing areas, OSC layout, and staffing/manning levels. No additional corrective actions are planned.

The last sentence in the third paragraph of section 9.c indicates that this item was identified during the exit as an Inspector Follow-up Item. It is Duke Power's position, as stated in our cover letter, that this item was not discussed during the exit.

Attachment 3

IFI 98-18-03: Review the licensee's evacuation criteria and procedures for non-essential personnel onsite during a radiological release in a future inspection.

Discussion:

Duke Power Company does not agree with the NRC evaluator's opinion because it is not based on regulation or lack of procedure adherence or guidance.

The NRC evaluator's opinion was that, from an ALARA consideration, Site Evacuation should have occurred at or shortly after the main steam relief valves lifted at approximately 1022 and remained open for approximately 22 minutes. At this time in the scenario, a steam generator tube leak was in progress. The release from the steam reliefs was occurring outside the turbine building. No site assembly locations were affected by the release through the steam reliefs.

RCS sample results had identified DEI to equal 1.5 uCi/ml. The RP Manager and the ALARA Supervisor in the OSC were monitoring radiological conditions. Field Monitoring Teams outside the protected area and OSC monitoring teams inside the protected area were not seeing any indications of an appreciable release that required additional protective actions for site personnel.

Once the main steam line break occurred at approximately 1045, RP was able to assess the situation and made the appropriate recommendation to the Emergency Coordinator to evacuate site personnel at approximately 1114. Also, it must be understood that the steam line break was not immediately evident. It was only after teams in the field noticed steam in the turbine building and after evaluating radiation monitor readings and RP monitoring data was the TSC able to determine that a steam line break had occurred.

The Emergency Coordinator implemented the Site Evacuation process at 1122 -- eight (8) minutes after recommendation from the RP Manager in the OSC -- even though two people were still missing inside the protected area.

Attachment 4

Paragraph 7, Notification Methods and Procedures

Within this section of the Inspection Report, the inspectors indicate a problem was found with our Emergency Notification procedures which could result in delays in implementing the Emergency Plan and inaccurate documentation of Emergency Preparedness response. As stated in the report, "The inspector determined that the licensee had developed a scheme to ensure the requirement to notify offsite agencies within 15 minutes was never exceeded."

All procedures for implementing the Oconee Nuclear Site Emergency Plan are sent to the NRC for their use/review within 30 days of approval for use in the Emergency Plan. Oconee's plan has been submitted and approved by the NRC. The methodology that Oconee uses for event declaration and notification has been in use for at least 5 years. This methodology has also been reviewed by the NRC during past drills.

There is no regulatory time required for declaring events nor for approving the contents of the message information being released to offsite agencies. The regulations do state the time span between declaration and transmittal should be no more than 15 minutes. Oconee has chosen for the emergency declaration time and the approval of the message form to be the same. Our position is that the written signature of the Emergency Coordinator/EOF Director on the emergency notification form is the official declaration time of the event.