

U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Nos. 50-220/88-26
50-410/88-25

Docket Nos. 50-220
50-410

License No. DPR-63
NPF-54

Priority ---

Category C

Licensee: Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New Hampshire 13212

Facility Name: Nine Mile Point Units 1 & 2

Inspection At: Scriba, New York

Inspection Conducted: August 1-3, 1988

Inspectors: Craig Z. Gordon 8/30/88
C. Z. Gordon, Team Leader, EPS,
FRSSB, DRSS date

E. Fox, Emergency Preparedness Section
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Approved By: W. J. Lazarus 9/8/88
W. J. Lazarus, Chief, EPS,
FRSSB, DRSS. date

Inspection Summary: Inspection on August 1-3, 1988 (Report Nos. 50-220/88-26
& 50-410/88-25)

Areas Inspected: Routine, announced emergency preparedness inspection and observation of the licensee's annual partial-participation emergency exercise performed on August 2, 1988. The inspection was performed by a team of five NRC Region I personnel.

Results: No violations were identified. The licensee's emergency response actions were adequate to provide protective measures for the health and safety of the public. A significant concern was identified with the licensee's ability to ensure confidentiality of scenario information prior to the exercise.



DETAILS

1.0 Persons Contacted

The following licensee representatives attended the exit meeting held on August 3, 1988:

R. B. Abbott, Station Superintendent, Unit 2
S. K. Agarwal, Licensing Engineer
G. Burgess, Assistant Emergency Planning Coordinator
T. J. Chwalek, Emergency Coordinator
K. A. Dahlberg, Station Superintendent, Unit 1
T. Galletta, Environmental Protection
E. C. Gordon, Supervisor, Radiological Support
P. Mangano, Computer Supervisor
T. Peeling, Nuclear Trainer
N. Radunshu, Director, Compliance
T. W. Roman, Engineering Superintendent
A. M. Salemi, Assistant Emergency Planning Coordinator
P. Volza, Radiation Protection Manager
J. Willis, General Superintendent

The team observed and interviewed several licensee emergency response personnel, controllers and observers as they performed their assigned functions during the exercise.

2.0 Emergency Exercise

The Nine Mile Point Nuclear Power Plant partial-participation exercise was conducted on August 2, 1988 from 7:00 AM to 3:30 PM.

2.1 Pre-exercise Activities

The exercise objectives, submitted to NRC Region I on May 19, 1988 were reviewed and determined to adequately test the licensee's Emergency Plan. On July 1, 1988, the licensee submitted the complete scenario package for NRC review and evaluation. NRC Region I representatives had telephone discussions with the licensee's emergency preparedness staff to discuss objectives, scope and content of the exercise scenario. As a result, minor changes were made in order to clarify certain objectives, revise certain portions of the scenario and ensure that the scenario provided the opportunity for the licensee to demonstrate the stated objectives as well as those areas previously identified by NRC as in need of corrective action.

NRC observers attended a licensee briefing on August 1, 1988, and participated in the discussion of emergency response actions expected during the various phases of the scenario. Specific changes resulting from NRC scenario review and comment were also discussed.



Following the briefing, licensee representatives discovered an error in an information package which had been distributed to all key exercise participants on July 27, 1988. The package provided general background information, ground rules, and plant conditions and parameters leading up to initiation of the exercise. Such information is routinely issued before emergency exercises as a reminder of the manner in which emergency response personnel should prepare and conduct themselves, yet does not disclose specific information about the scenario.

Through an inadvertent oversight on the part of the licensee's emergency preparedness staff, the participant package included a list of explicit events expected to occur during the exercise. Almost every individual within the emergency response organization who has a responsible role in implementing the Emergency Plan received a copy of the briefing package. On the evening of August 1, 1988, the events list within the package was discovered by a licensee department manager and brought to the attention of the Emergency Preparedness Coordinator. The EPC subsequently discussed the problem with the NRC team members.

The primary objective of the exercise was to observe the effectiveness of interface between the licensee's security and operations personnel during emergencies. Since this was a partial-participation exercise, the scenario was developed to realistically challenge the licensee's onsite organization but limit offsite impact. On August 2, 1988, the exercise proceeded as scheduled and the NRC team determined that the licensee's performance was adequate to protect public health and safety and that the interface between site security and the operations staff was particularly noteworthy. The licensee has agreed to ensure confidentiality of future scenarios.

The exercise scenario included the following events:

- Security breach in Turbine Building;
- Sabotage of emergency switchgear equipment;
- Bomb explosion in Turbine Building Offgas Area;
- Rupture of Offgas line;
- Reactor scram;
- Loss of RCIC, HPCS, and suppression pool cooling;
- Release of radioactivity to the environment;



- Declaration of Alert, Site Area Emergency and General Emergency classifications;
- Calculation of offsite dose consequences; and
- Recommendation of protective actions to offsite officials.

2.2 Activities Observed

During conduct of the licensee's exercise, NRC team members made detailed observations of the activation and augmentation of the emergency organization, activation of emergency response facilities, and actions of emergency response personnel during the operation of the emergency response facilities. The following activities were observed:

1. Detection, classification, and assessment of scenario events;
2. Direction and coordination of the emergency response;
3. Augmentation of the emergency organization and response facility activation;
4. Notification of licensee personnel and offsite agencies of pertinent plant status information;
5. Communications/information flow, and recordkeeping;
6. Assessment and projection of offsite radiological dose and consideration of protective actions;
7. Provisions for inplant radiation protection;
8. Performance of offsite and inplant radiological surveys;
9. Maintenance of site security and access control;
10. Performance of technical support, repair and corrective actions;
11. Assembly, accountability and evacuation of personnel;
12. Preparation of information for dissemination at the Emergency News Center; and
13. Management of recovery operations.



3.0 Exercise Observations

The NRC team noted that the licensee's activation and augmentation of the emergency organization, activation of the emergency response facilities, and use of the facilities were generally consistent with their emergency response plan and implementing procedures.

3.1 Exercise Strengths

The team also noted the following actions that provided strong positive indication of their ability to cope with abnormal plant conditions:

- Integration and coordination between the Operations staff and security staff was well organized through implementation of EP-10.
- The section of the scenario package describing scenario assumptions expedited the review of radiological parameters, field survey data, and inplant data.
- Direction, control, and coordination of activities in the TSC and EOF provided timely and effective resolution to most problems.
- Personnel briefings on plant status and updates to emergency personnel in each facility were timely and complete.
- Capability of the communications van ensured reliable notification and interface with offsite groups and support personnel.

3.2 Exercise Weaknesses

The NRC identified the following exercise weaknesses which need to be evaluated and corrected by the licensee. The licensee conducted an adequate self critique of the exercise that also identified some of these areas.

- Emergency Operating Procedures are not consistent with Technical Specifications regarding actions to be taken if the suppression pool temperature limit of 120 degrees is exceeded (50-220/88-26-01; 50-410/88-25-01)
- The Emergency Action Levels for Security compromise in the Emergency Plan for the Unusual Event and Alert emergency classifications are not updated to agree with the Security Contingency Plan (50-220/88-26-02; 50-410/88-25-02).
- During site lockout, provisions should be in place to permit NRC



and other key personnel expedited access and egress to and from any site area (50-220/88-26-03; 50-410/88-25-03).

- Information contained in press releases was not confirmed prior to distribution since one release incorrectly indicated a fire was burning in the offgas building (50-220/88-26-04; 50-410/88-25-04).
- EOF maps used for offsite field monitoring teams do not allow continuous positioning of field teams to be displayed (50-220/88-26-05; 50-410/88-25-05).
- Notification to State and local authorities via the RECS following declaration of the Alert classification exceeded the 15 minute requirement of 10 CFR 50 Appendix E, IV.D.3 (50-220/88-26-06; 50-410/88-25-06).

4.0 Licensee Actions on Previously Identified Items

The following items were identified during previous inspections (Inspection Report Nos. 50-220/87-19 & 50-410/87-31) and remained open prior to the exercise. Based upon observations made by the NRC team during this exercise, the following items were acceptably demonstrated and are closed. No recurring items were identified.

(CLOSED) 50-220/87-19-01: Unrealistic scenario events led to inappropriate response by plant operators and scenario plant data not consistent with actual plant parameters.

(CLOSED) 50-220/87-19-02: Availability of OSC maintenance personnel including accountability and habitability was inadequate.

(CLOSED) 50-220/87-19-03: Plant process computer cannot be used simultaneously for real-time and scenario data.

(CLOSED) 50-220/87-19-04: Procedure for accountability not adequate to verify actual number of missing individuals onsite.

5.0 Licensee Critique

The NRC team attended the licensee's post-exercise critique on August 3, 1988, during which the key licensee controllers discussed observations of the exercise. The licensee indicated these observations would be evaluated and appropriate corrective actions taken.

Specific improvement areas which were identified by the licensee related to: inadequate control and distribution of the scenario briefing package, early activation of security staff, public address system problems, access to maintenance equipment in high radiation areas, and information provided to offsite monitoring teams.



6.0 Exit Meeting and NRC Critique

The NRC team met with the licensee representatives listed in Section 1 of this report at the end of the inspection. The team leader summarized the observations made during the exercise.

The licensee was informed that previously identified items were adequately addressed and no violations were observed. Although there were areas identified for corrective action, the NRC team determined that within the scope and limitations of the scenario, the licensee's performance demonstrated that they could implement their Emergency Plan and Emergency Plan Implementing Procedures in a manner which would adequately provide protective measures for the health and safety of the public.

Licensee management acknowledged the findings and indicated that appropriate action would be taken regarding the identified open items.

At no time during this inspection did the inspectors provide any written information to the licensee.

