

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-275/85-18, 50-323/85-18

Docket Nos. DPR-80, 81

Licensee: Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California 94106

Facility: Diablo Canyon Units 1 & 2

Inspection at: Diablo Canyon Site, San Luis Obispo County, and Pacific Gas  
and Electric Company's Corporate Offices, San Francisco,  
California

Inspection Conducted: April 8-12 and 22-26, 1985

Inspector:

*K. M. Prendergast*  
K. M. Prendergast  
Emergency Preparedness Analyst

5/29/85  
Date Signed

Approved By:

*R. F. Fish*  
R. F. Fish, Chief  
Emergency Preparedness Section

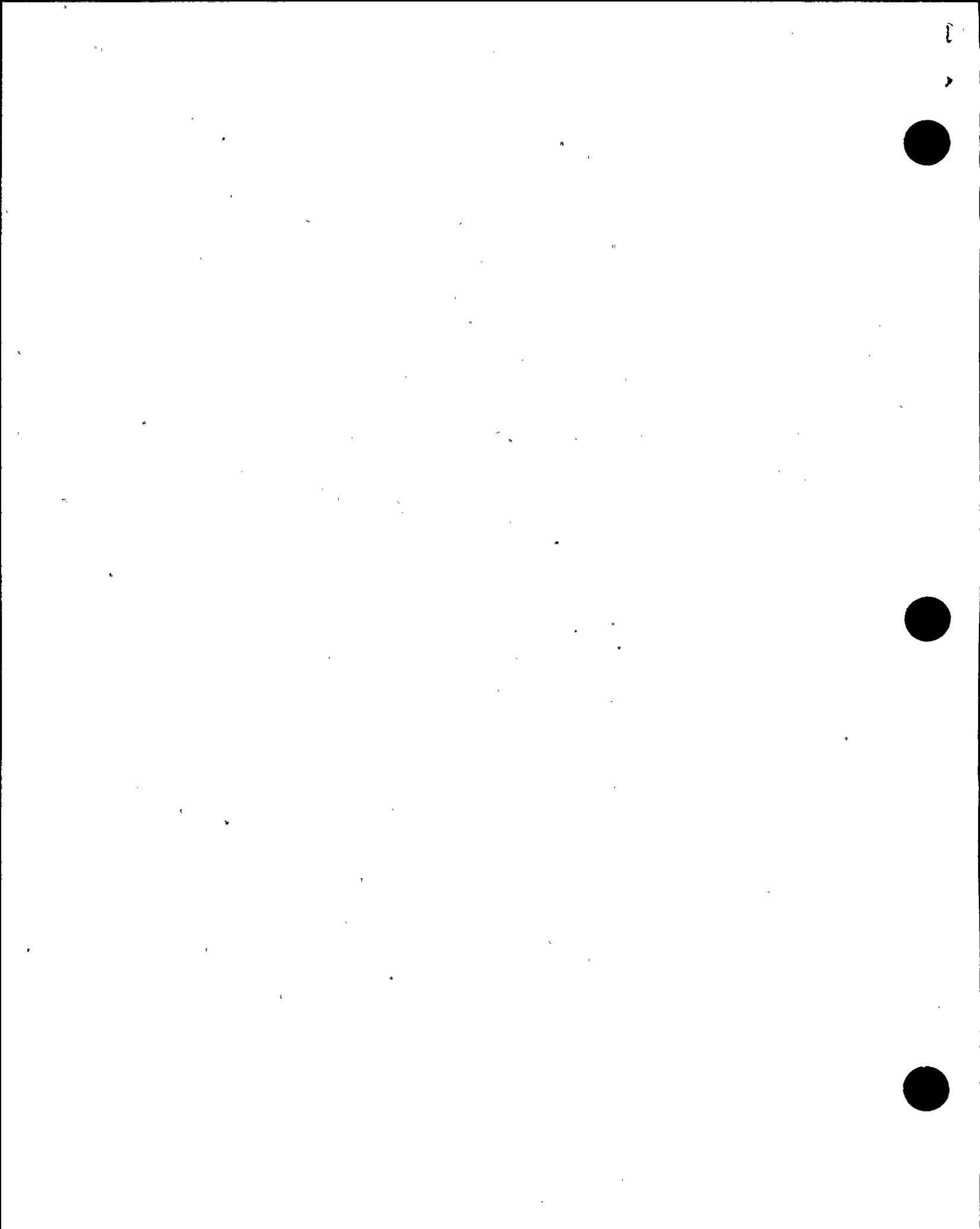
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Summary:

Inspection on April 8-12 and 22-26, 1985 (Report Nos. 50-275/85-18 and  
50-323/85-18)

Areas Inspected: Announced routine inspection of the changes to the Emergency  
Plan and associated implementing procedures, knowledge and performance of  
duties (training) and licensee audits. The inspection involved about 58 hours  
of onsite time by one NRC inspector.

Results: No significant deficiencies or violations of NRC requirements were  
identified.



## Details

### 1. Persons Contacted

- \*T. Mack, Sr. Nuclear Generation Engineer, Nuclear Power Operations
- \*E. Waage, Sr. Nuclear Generation Engineer, Nuclear Power Operations
- \*R. Jones, Engineer (Impell)
- \*G. Heggli, Sr. Engineer, Quality Assurance
- \*T. Martin, Training Manager
- \*J. Gilfore, Training Instructor
- \*B. Exner, Training Administrative Supervisor
- \*A. Dames, Sr. Training Instructor
- \*B. Keyworth, Senior Power Production Engineer, Emergency Planning

\*Denotes those personnel attending the exit interviews.

### 2. Changes to the Emergency Preparedness Program

The inspector's review of changes to the Emergency Preparedness Program included an examination of changes to the Diablo Canyon Emergency Plan (EP), changes to the EP emergency procedures, changes to the Corporate Emergency Response Plan (CERP), changes to the CERP implementing procedures, the methods employed to effect those changes, and changes to site and corporate emergency response organizations.

The Diablo Canyon emergency planning section has the responsibility for controlling changes and revisions to the Diablo Canyon Emergency Plan and associated emergency procedures. When a change to the EP or emergency procedures is required, other than editorial, the Senior Emergency Planner has the responsibility to insure that an independent review of the change is performed by someone with expertise in the area of the change. The Senior Emergency Planner is then responsible to review the change, and if approved, present the change to the Plant Staff Review Committee (PSRC). The PSRC will then review the change to determine that the change does not affect plant safety, does not alter the intent of the original document, and does not effect the technical specifications. After formal approval by the PSRC, the revised procedure is then forwarded to the Plant Manager for his approval. After review and approval by the Plant Manager, the revised procedure is forwarded to Document Control for distribution to assigned holders of the Emergency Plan, and associated emergency procedures. The inspector reviewed a random sampling of changes to the EP and emergency procedures and determined that management had approved the changes, the procedures had been discussed and approved during PSRC meetings, and that procedures for effecting changes to the EP and emergency procedures appear to be followed. The changes to the EP appeared to be primarily for increased clarity, and the result of upgrades in equipment and facilities. There were no changes observed that appeared to decrease the safety of the plant. The inspector also examined the licensee's procedures for distribution of changes to the EP and emergency procedures. The procedures make Document Control responsible for the distribution of revisions and changes to the Emergency Plan and emergency procedures.



Document Control then tracks the return of the outdated procedure as a method of assuring the change was made. This appears to be an adequate method to ensure that the controlled copies of the EP and emergency procedures are current and maintained up to date. A random examination of a number of copies of the emergency procedures was performed during this inspection and they were found to be properly maintained and updated.

Changes to the Corporate Emergency Response Plan (CERP) and associated implementing procedures are controlled by the Supervising Nuclear Generation Engineer - Personnel and Environmental Safety. Annually, one individual is assigned the responsibility to review and update the CERP, and to incorporate the results of training, exercises and drills, and departmental changes and capabilities. Changes to the implementing procedures may be initiated anytime justification for a change exists. When a change to the CERP or implementing procedures is required, a draft of the change is initiated and submitted to the Supervising Nuclear Generation Engineer. The Supervising Nuclear Generation Engineer then has the responsibility for reviewing the change, and if approved, obtaining the approval signatures of the Chairman - President's Nuclear Advisory Committee (PNAC), and Chairman of the Board and Chief Executive Officer, prior to implementation.

A random sampling of changes to the CERP and implementing procedures disclosed, that changes had been reviewed by management prior to implementation, and that procedures for making changes appeared to have been followed. In addition, the review also indicated that changes to the CERP were primarily for clarification or to reflect current status or capabilities. An examination of the Corporate Incident Response Center (CIRC) confirmed that the CIRC was as described in the CERP and implementing procedures. Also it was noted, that the CIRC contained an adequate number of updated copies of the CERP and implementing procedures, and that the names and phone numbers of individuals in the Corporate Emergency Response Organization were current.

The inspector discussed organizational changes with both the corporate and site emergency organizations, to determine their impact on the Emergency Preparedness Program. Some of the changes affected the day to day reporting chain of the corporate and site emergency organizations; however, the conclusion was that none of the changes would have an adverse effect on the emergency organization.

### 3. Licensee Audits -

The inspector examined the licensee's audit of the Emergency Preparedness Program to determine that an independent annual audit had been performed and that it met the requirements of 50.54(t) of 10 CFR Part 50. The audit to meet this requirement above was conducted on October 8-19, 1984. The audit contained an evaluation of the adequacy of the PG&E interface with state and local government. It also contained an evaluation of PG&E's drills, exercises, capabilities, and procedures associated with the Emergency Preparedness Program. The results of the audit were transmitted to management by letter dated November 27, 1984.



The audit distribution list was examined and observed to contain members of management for both the plant and corporate offices. State and local governments should be added to the audit distribution list for that portion of the audit that dealt with the interface with state and local government.

Note: Prior to the conclusion of the inspection the licensee had transmitted a copy of the aforementioned 50.54(t) audit to members of state and local government. Also, the audit did not identify any needs for improving the interface between the licensee and the government organizations.

In reviewing the audit, it was noted that there were no nonconformances reported. There were, however, seven improvement recommendations contained in the audit, and all seven were noted to have been acted upon. The audit finding which concerned inventories of emergency kits was being tracked by the Quality Assurance Department.

There were no references to Appendix E of 10 CFR 50, or 50.47(b) observed in the audit or the audit plan. The audit plan referenced NUREG 0654, but failed to specifically address the regulatory requirements of the Emergency Preparedness Program. The addition of these regulatory requirements to the audit plan was discussed during the exit conference. Such an addition would insure that the regulatory requirements of the program are included in the audit plan should changes to the NUREG occur.

Auditor qualifications were reviewed and all individuals on the audit team appeared well qualified. All members of the team had degrees in engineering, many years of experience, and had attended numerous courses in auditing. Also none of the individuals in the audit team have any responsibilities in the Emergency Response Organization.

Critiques for drills and exercises were examined and observed to be routed to management. Suggestions for improvement were noted to be included in the critique and tracked by the emergency planning action item list. Sixteen items from the 1984 exercise were observed to be resolved at this time. A number of resolved items were inspected and their resolution appeared appropriate. The licensee appears to have an adequate program for tracking deficiency or improvement items identified during drills or exercises. The licensee also utilizes such items in the preparation of scenarios used for exercises or drills.

There were no deficiencies or violations observed in this portion of the licensee's program.

#### 4. Knowledge and Performance of Duties (Training)

The Emergency Plan, emergency procedures and plant administrative procedures were reviewed, training records were audited, lesson plans and tests were examined, and walkthroughs of a hypothetical scenario were performed, in order to determine that a training program has been established and maintained in accordance with 10 CFR 50.47(b)(15).



The Corporate Emergency Planning Section has the responsibility for ensuring that all members of the Corporate Emergency Response Organization (CERO) are current in their training requirements. Records of CERO training were examined and they showed that the licensee is tracking required training on a quarterly frequency and all members assigned to the CERO were current in their annual training requirements. Recent changes to the CERP implementing procedures also make training mandatory prior to assuming a position in the CERO.

The Plant Training Department has the responsibility to ensure all members of the plant emergency organization receive initial and annual refresher training. Records of required emergency training for Shift Foreman, Shift Technical Advisors (STAs), and Auxiliary Operators were examined. The records demonstrated that with the exception of a few individuals required training had been received. Records documented that memos had been sent to the above mentioned individuals, and their supervisors, concerning methods of fulfilling their training requirements. Records also documented that management would be taking further steps should required training not be completed.

The licensee has recently completed a task analysis of the Diablo Canyon training program based on an INPO good practice procedure. In response to the task analysis results, the licensee is further evaluating ways to increase the quality of training, remove redundant information and to promote uniformity and a consistently high quality instruction for plant personnel. In reviewing the emergency preparedness training program it was apparent that the application of the task analysis results and the hiring of an additional instructor for emergency preparedness had improved the emergency preparedness training program. A number of lesson plans and tests were also examined during this inspection and noted to be improved over some of the previous ones.

Walkthrough exercises were conducted with a number of Shift Foremen and Shift Technical Advisors. The walkthroughs were conducted to ascertain their understanding of the responsibilities given to them during emergency situations, and their abilities to perform their assigned duties. The interviews included discussions and responses to postulated accidents, all of which involved high primary activity and ultimately led to a release of radioactive materials to the atmosphere. The following summarizes the findings of the walkthroughs:

1. The Shift Foremen were familiar with their responsibilities as the Emergency Coordinator in an emergency, and were willing to execute them. They were also familiar with which duties were theirs alone and those that could be delegated.
2. The Emergency Coordinators demonstrated the ability to properly classify the events using plant conditions as a basis for the classification and were also able to make a classification based on offsite dose assessment.
3. The Shift Foremen with the help of the STA's demonstrated the ability to perform dose calculations for the site boundary and to



make protective action recommendations incident to the results of those calculations.

5. Exit Interview

Exit interviews were held on April 12 (corporate office) and April 26 (Diablo Canyon), 1985 for the purpose of discussing the preliminary findings of the inspection. Licensee personnel present have been previously identified in paragraph one above. The licensee was informed that no significant deviations or violations of NRC requirements had been identified. The following items were also discussed.

- \*1) The licensee should consider establishing a method for the transmittal of the portion of the 50.54(t) audit that involves the evaluation of adequacy of the interface with state and local governments to the appropriate state and local governments.
  - \*2) The licensee should consider including the regulatory requirements, specifically 10 CFR 50.47(b) and 10 CFR 50 Appendix E; in the reference portion of the annual emergency preparedness audit.
  - \*\*3) The licensee should evaluate the need to establish qualifications for instructors in their training program as a method of ensuring a consistent high quality of instruction.
  - \*\*4) The licensee should evaluate the need for an increased use of table top drills as a method for increasing the Shift Foreman's proficiency and familiarity with the emergency procedures.
- \* Indicates topics covered at the closing conference held at the Corporate Office.
- \*\* Indicates topics covered at the closing conference held at Diablo Canyon.

