

U. S. NUCLEAR REGULATORY COMMISSION
REGION V

Report Nos. 50-275/85-45 and 50-323/85-44

Docket Nos. 50-275 and 50-323

License Nos. DPR-80 and DPR-82

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

Facility: Diablo Canyon Units 1 and 2

Inspection at: Diablo Canyon Site, San Luis Obispo County, CA

Inspection Conducted: December 30, 1985 - January 3, 1986

Inspector:

K. M. Prendergast
K. M. Prendergast

Emergency Preparedness Analyst

2/27/86
Date Signed

Approved by:

R. F. Fish
R. F. Fish, Chief

Emergency Preparedness Section

2/27/86
Date Signed

Summary:

Inspection on December 30, 1985 - January 3, 1986 (Report Nos. 50-275/85-45 and 50-323/85-44)

Areas Inspected: Unannounced routine inspection of the licensee's Emergency Preparedness Program including: knowledge and performance of duties (training), licensee audits, and the public information program. The inspection involved approximately 40 hours of direct inspection by one NRC inspector.

Inspection procedures 82206, 82209 and 82210 were covered.

Results: Of the three areas inspected, two items of noncompliance were identified in two areas (failure to complete required annual retraining, Paragraph 3; failure to maintain emergency kits, paragraph 2).

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DETAILS

1. Persons Contacted

R. Thornberry, Plant Manager
*W. Kaefer, Assistant Plant Manager
*T. Martin, Training Manager
A. Dame, Senior Training Instructor
*W. Keyworth, Senior Power Production Engineer
J. Gilfor, Training Instructor
B. Clark, Chemistry and Rad Protection Foreman
C. Cox, Emergency Planner

*Denotes those attending the exit meeting.

2. Licensee Audits

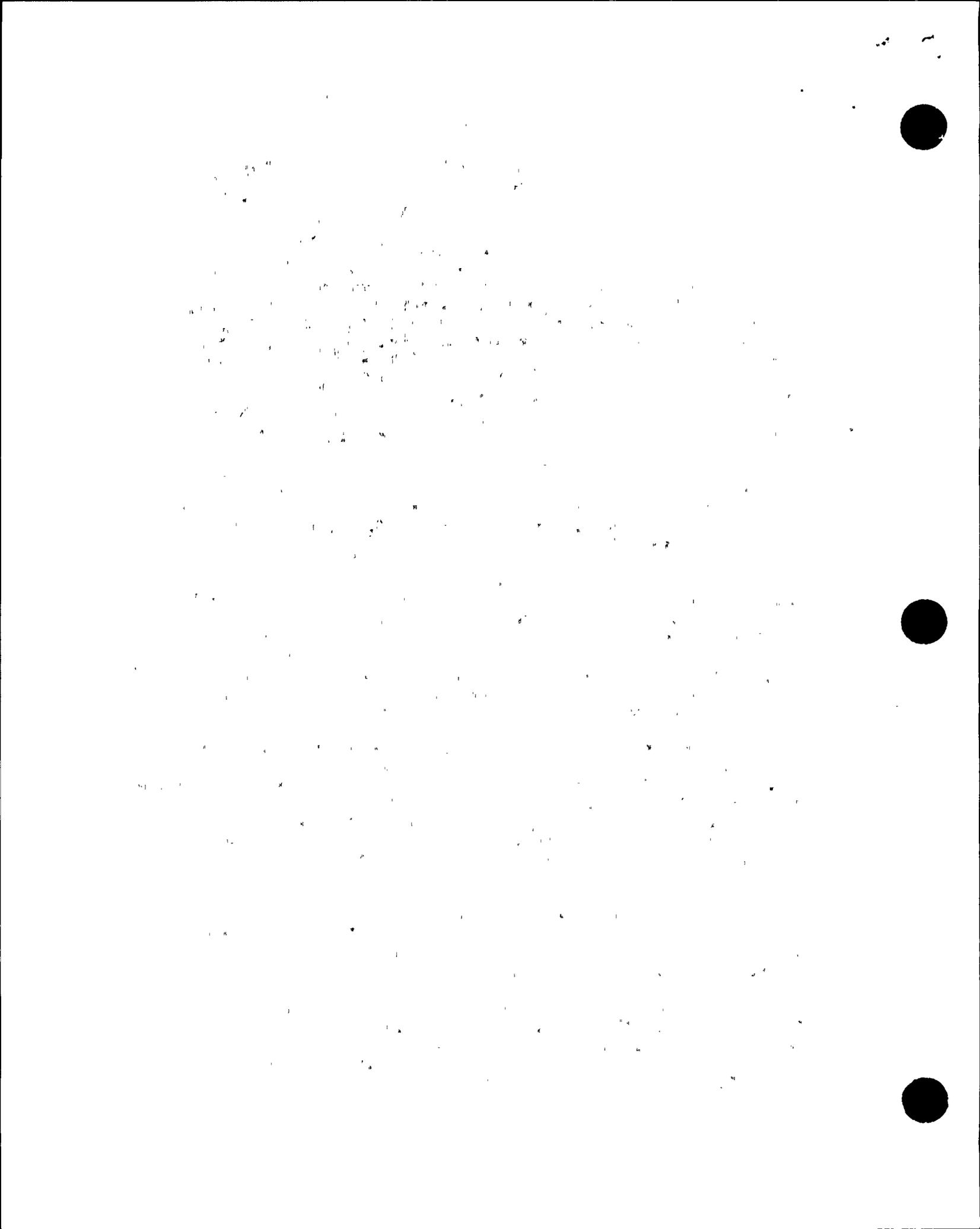
The inspector examined the licensee's annual audit of the Emergency Preparedness (EP) Program to determine that an independent audit, required by 10 CFR, 50.54(t), had been performed. The audit to meet this requirement was conducted on August 6-15, 1985. A review of the audit report was performed.

The audit was divided into seven categories: administration, emergency organization, emergency training and retraining, emergency facilities and equipment, procedures, coordination with offsite groups, and drills and exercises. The audit also contained an evaluation of the adequacy of the interfaces with state and local governments and an evaluation of licensee drills, exercises, capabilities and procedures. The review of the audit indicated that the requirements contained in 10 CFR 50.47(b), 10 CFR 50, Appendix E and NUREG 0654 Revision 1, had been addressed.

The results of the audit along with recommendations for improvement were transmitted to members of corporate and plant management by letter dated September 13, 1985. The audit identified four areas where improvement was warranted. Audit Finding Report (AFR) Nos. 85/366-369 identified these areas and were still open at the time of this inspection. A review of the audit distribution list disclosed that appropriate members of state and local agencies had been provided with a copy of the audit report and recommendations.

Auditor qualifications were reviewed. The review indicated that the team members have no direct responsibilities in the EP Program. The review also indicated that the audit team was qualified and that all members of the team had many years of auditing experience.

Critique records from drills and exercises were examined. The records indicated that drills and exercises were being conducted at the frequency stated in the Emergency Plan. The records also documented that suggestions for improvement were included in the critique process and were being tracked to completion by the Emergency Planning Department. A



number of resolved items from the Emergency Planning open items list were reviewed and their resolution appeared appropriate.

PG&E audit 84284P, the 1984 annual EP audit, identified deficiencies in the licensee's emergency kits. AFR 84-219 was written to identify this open item. The findings of the 1985 emergency preparedness audit also identified similar findings, consequently AFR 84-219 was still considered to be open. August 31, 1985 was established as the completion date for corrective action on this item. AFR 84-219 was closed in November 1985, after an examination by Quality Assurance.

An examination of the closure of item AFR 84-219 was performed during this inspection. The Emergency Plan and implementing procedures were reviewed and an inspection of emergency kit nos. 4 and 5 located in the Training Building was conducted. The examination revealed that the emergency kits were not sealed as required by emergency implementing procedure EF-5. The examination also noted that one of the required air samplers was missing and that the other required air sample had a dead battery, a broken 1 minute switch, and was out of calibration. The calibration was due on 12/24/85. Emergency kit inventory records were also reviewed during this portion of the inspection. Records of an inventory of the emergency kits performed on 12/11/85 indicated that kit #4 in the Training Building was missing one air cylinder and one Redeco air sampler. The records also indicated that kit #3 in the service center was missing one of two air samplers. According to the licensee, the Instrumentation and Calibration Department had been experiencing problems in maintaining an adequate supply of calibrated air samplers to fulfill the emergency kits required inventory. It should be noted that deficiencies in emergency kit inventory were also identified during the Emergency Response Facilities Appraisal (NRC Report No. 50-275/85-24).

Based upon this inspection it appears that corrective action on AFR 84-219 was ineffective. The licensee's failure to maintain their emergency kits in accordance with Procedure No. EF-5 was identified as an apparent violation of Technical Specification 6.8.1 (85-45-01).

3. Training

The Emergency Plan, related implementing procedures and administrative procedures were reviewed, tests were examined, and records of training were reviewed to insure that a Training Program had been established and maintained in accordance with Technical Specification 6.8.1.

Corporate Emergency Planning has the responsibility for ensuring that all members of the Corporate Emergency Response Organization (CERO) are maintaining their annual requirements for training in accordance with the Corporate Emergency Response Plan Implementing Procedure 2.2. CERO training records were examined. The examination disclosed that the licensee is actively tracking required training and memos have been distributed to individuals who are currently due or past due for required training. However, it appeared that fifteen members of the CERO were 2 months overdue in their annual retraining. The licensee was apprised of the training deficiencies during this inspection so action could be taken to insure training was accomplished before fifteen months had elapsed.

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The licensee considers 15 months as the time frame to meet the annual training requirement. The licensee reported by phone call to this inspector on January 14, 1986 that a few members of the CERO organization had been dropped (since this inspection) for failure to maintain their annual retraining requirements. The licensee also reported that all members of the CERO were current in their annual training at this time (January 14, 1986), and new procedures are being instituted to insure training is maintained.

The Plant Training Department has the responsibility to insure that all members of the plant emergency response organization maintain their annual training requirements in accordance with Administrative Procedure B-50. Records of training for individuals maintaining positions in the Emergency Response Organization (ERO) were reviewed. The record review indicated the following training deficiencies.

- a) Eighteen members of the plant staff had not completed course EPD 500 since 9/31/84. EPD-500* is the introduction to Emergency Planning at Diablo Canyon and is required annually.
- b) Seven (7) individuals had not completed the emergency response retraining required for their position in the ERO. Four of these individuals had not completed EPD 200.* The other three individuals were noted to be Shift Foreman, the individual who would become the Emergency Coordinator during an emergency. One Shift Foreman had last attended training on EPD 200* on 8/1/84, EPD 260* on 10/22/84 and had not attended EPD 800 by the time of this inspection. Another Shift Foreman had last attended EPD 260 on 10/15/84 and had also not attended EPD 800*. One Shift Foreman failed to satisfactorily complete the course requirements for EPD 260, 500, 700 and 800 on 6/18/85 and had not requalified in the required courses as of 1/3/86. AP B-50 requires training in EPD 100, 200, 260, 700, and 800 to be accomplished annually for Shift Foreman.

Discussions with the Training Department Managers indicated that the Training Department was actively tracking required training on a monthly frequency. The discussions also disclosed that the individuals and their supervisors had been sent memos addressing training deficiencies. Interviews with other management personnel indicated that management attention had been focused on the startup of Unit two reactor.

Recent telephone discussions held with the Training Department on January 21, 1986 indicate that all Shift Foremen have completed their annual training, and that the individuals who were deficient in EPD 500 training are now current.

The failure to satisfy the licensee's annual retraining requirements is a violation of Technical Specification 6.8.1 (86-06-02).

- * EPD 800, Release of Information to the Media/Public (established November, 1985)
 EPD 260, Basic Radiation Accident Assessment
 EPD 200, Radiological Emergency Response Procedure
 EPD 500, Introduction to Emergency Planning at Diablo Canyon

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4. Public Information

The licensee's program for the dissemination of information to the public on an annual basis was examined. A discussion with FEMA was held, regulatory requirements were reviewed, and the licensee's public information brochure was examined.

The licensee has coordinated their efforts with local jurisdictions to develop an Emergency Response Plan booklet. The booklet addressed emergency measures to be taken during an emergency for individuals living or working in the Emergency Planning Zone (EPZ), the transient population, and tourists and campers. The booklet also referenced the radio stations that would be used to provide emergency information and contained the following information: notification, protective actions, assistance for people with disabilities, emergency planning zones, transportation assistance, school evacuation, event classification, and some basic facts concerning radiation. The booklet, updated annually, contains the current phone numbers and addresses of the County Office of Emergency Services and PG&E where further information can be obtained. PG&E uses the utility billing list of business and individuals in the EPZ for distribution of this booklet. The last mailing of this annual booklet was stated to be January 26, 1985.

Discussions with FEMA indicated they were provided with copies of the current Emergency Plan booklet and were satisfied that the booklet fulfilled the guidance contained in IV.D.2 of 10 CFR 50, Appendix E.

No items of noncompliance or deficiencies were identified.

5. Exit Interview

An exit interview was held on January 3, 1986 for the purpose of discussing the preliminary findings of this inspection. Licensee personnel present at this meeting have been identified in Paragraph one (1) above. The following items were discussed during the interview.

- a. The licensee's annual audit of the EP Program, which was performed to meet the requirements of 50.54(t) was observed to have implemented the suggestions contained in inspection report No. 50-275/85-18, and was improved over the previous year's audit.
- b. The licensee was also informed that two apparent violations of NRC requirements were identified. One violation concerned the maintenance of emergency kits and supplies to be used during an emergency. The other violation dealt with deficiencies in required retraining.

The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy verification of the data.

Furthermore, it is noted that the records should be kept in a secure and accessible format. Regular backups are recommended to prevent data loss in the event of a system failure or disaster. The document also mentions the need for periodic audits to ensure the integrity and accuracy of the information stored.

In addition, the text highlights the role of technology in streamlining record-keeping processes. Modern accounting software can automate many tasks, reducing the risk of human error and saving valuable time. However, it is stressed that users must be properly trained to utilize these tools effectively.

Finally, the document concludes by stating that good record-keeping practices are essential for the long-term success of any business. They provide a clear picture of financial performance and are crucial for making informed decisions and complying with legal requirements.

The second section of the document focuses on the specific steps involved in setting up a robust record-keeping system. It begins by recommending the selection of a reliable accounting software solution that meets the specific needs of the organization. Key factors to consider include scalability, integration capabilities, and user-friendliness.

Once the software is chosen, the next step is to establish clear policies and procedures for data entry and management. This includes defining who is responsible for entering data, how often it should be updated, and the process for handling corrections or disputes. Consistency is key to ensuring the quality of the records.

The document also discusses the importance of data security. It advises implementing strong password policies, using secure communication channels, and restricting access to sensitive information only to authorized personnel. Regular security updates and vulnerability assessments should also be performed to protect against potential threats.

Additionally, it is suggested that users should conduct regular data backups and store them in a secure, off-site location. This provides an extra layer of protection against data loss. The document also touches upon the need for ongoing training and support for users to ensure they are confident and proficient in using the system.

In summary, setting up a solid record-keeping system requires careful planning and attention to detail. By following the guidelines outlined in this document, organizations can ensure that their financial records are accurate, secure, and easy to manage, ultimately contributing to their overall operational efficiency and success.