

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report Nos. 50-27⁵~~7~~/90-21 and 50-323/90-21

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 Name: Diablo Canyon Units 1 and 2

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

Inspection Conducted: August 13-17, 1990

Inspector: K. M. Prendergast 8/30/90
K. M. Prendergast Date Signed
Emergency Preparedness Analyst

P. M. Qualls 8/31/90
P. M. Qualls Date Signed
Reactor Inspector

Approved by: J. P. Roberts 8/31/90
J. P. Roberts, Acting Chief Date Signed
Safeguards, Emergency Preparedness,
and Non-Power Reactor Branch

SUMMARY:

Inspection On August 13-17, 1990 (Report Nos. 50-275/90-21 and 50-323/90-21)

Areas Inspected: Unannounced routine inspection of the Emergency Preparedness Program and follow-up of open items. Inspection Procedures 92701 and 82701 were covered.

Results: Overall, the licensee's program appears adequate in the area of emergency preparedness. However, weaknesses in the licensee's drill program and the maintenance of the TSC were identified and are described in Section 3. Strengths identified in the area of emergency response training were noted and described in Section 3.d.



DETAILS

1. Persons Contacted:

- *J. Townsend, Vice President, Diablo Canyon Operations
- *R. Kohout, Manager, Safety, Health, and Emergency Services
- W. Keyworth, Senior Power Production Engineer, Emergency Planning
- *J. Boots, Chemistry Manager
- S. Joiner, Emergency Planning
- *W. White, Supervisor, Training
- *T. Grebel, Supervisor, Regulatory Compliance
- E. Wessel, Chemical Engineer
- *J. Hinds, Senior Regulatory Compliance Engineer

* Indicates personnel attending the exit interview

2. Follow-up (92701)

(Open) Open Item No. 90-04-01, Monitor Scope, Conduct and Documentation of Future Health Physics Drills. This item was examined and further effort is required in this program area to satisfy the requirements for drills and exercises contained in the Emergency Plan. One NCV was identified in this program area. Documentation of weaknesses identified in this area are described in Section 3.(e) of this report. This item is still open.

(Closed) Open Item No. 90-04-02, Administrative Procedures That Implement the Emergency Plan Were Not Submitted to the NRC. This item was examined, and the licensee has established a class of procedures entitled "Emergency Plan Administrative Procedures" that are treated in the same manner as Emergency Plan implementing procedures and sent to the NRC in accordance with Section V of 10 CFR 50 Appendix E. Emergency Plan Administrative Procedures EP-AD-1, Emergency Plan Training, and EP-AD-2, Emergency Plan Drills, which implement Section 8 of the Emergency Plan, have been included in this category and are now sent to the NRC. This item is closed.

3. Operational Status of The Emergency Preparedness Program (82701)

a) Emergency Plan and Implementing Procedures

The Emergency Plan and implementing procedures were examined, and it was noted that the licensee had submitted Change 10 to the Emergency Plan to the NRC on May 14, 1990. The changes to the Emergency Plan included some changes in the site organization and some additional Control Room staffing. The changes to the Emergency Plan will be reviewed and addressed under a separate correspondence. Changes to the licensee implementing procedures which included: RB-1, Personnel Dosimetry; RB-2, Emergency Exposure Guides; and RB-5, Area and Equipment Decontamination, were examined. The changes appeared to be improvements and were noted to have been reviewed, approved, and



distributed in accordance with the licensee's administrative procedure and NRC requirements.

No deficiencies or violations of NRC requirements were identified in this program area.

b) Emergency Facilities, Equipment, Instrumentation, and Supplies

An inspection of the licensee's emergency response facilities was conducted to verify essential emergency facilities and equipment were maintained in a state of operational readiness. The inspection included verifying instrument calibration and operability, the availability of updated copies of the Emergency Plan and implementing procedures, and the maintenance of emergency facilities. The following were noted:

- ° The Technical Support Center (TSC) was visited by the inspectors. Updated copies of the Emergency Plan and implementing procedures were available, and the TSC was configured as described in the Emergency Plan. The inspectors inventoried emergency response equipment available in the TSC and noted that all required equipment was in place. The inspectors noted one self-contained breathing apparatus (SCBA) had a tag on it which indicated that it had not been inspected for one year. This SCBA was replaced during the inspection.
- ° During the inspection, the inspectors noted that the TSC radiation monitor appeared to be in a degraded condition. The TSC Laboratory Iodine (RE-83) air particulate (RE-68) and noble gas (RE-69) monitors and the TSC air particulate monitor (RE-66) had been out of service (OOS) since mid-June 1990. The TSC Iodine and noble gas monitors (RE-82 and RE-67) were the only two atmosphere monitors operable in the TSC. NRC guidance on emergency facilities and equipment, discussed in NUREG-0737, states that the TSC shall be provided with radiological protection and monitoring equipment necessary to assure that the radiation exposure to any person working in the TSC would not exceed 5 Rem whole body, or its equivalent to any part of the body, for the duration of the accident. Section II.H of NUREG-0654, Rev. 1, states that each licensee shall have a TSC in accordance with NUREG-0696, Rev. 1. NUREG-0696, Rev. 1, Section 2.6, states that the TSC shall have the same radiological habitability protection, including protection of personnel from radiological hazards such as airborne radioactivity, as Control Room personnel. This problem was identified by the licensee in June 1990 during their 10 CFR 50.54(t) audit, Audit 90809T. Action Request No. A0196236 was written on June 27, 1990, with a recommended action date of July 31, 1990. As of the completion of the inspection, no action had been taken with regard to this equipment. The inspectors questioned how the degraded TSC monitors could ensure that the TSC remained habitable to insure the protection of personnel. No portable monitors had been staged or dedicated in the TSC for this purpose. The licensee stated that they would review the status of this equipment.



- The housekeeping practices in the TSC were also brought up. The area designated as the NRC Office, where the ENS phone is installed, appeared to be used as a storage area. The inspectors discussed with licensee personnel the need to have the TSC available for use at all times even when personnel to remove excessive stored materials may not be available. The readiness state of the TSC will be reviewed during the course of the routine inspection program for emergency preparedness.
- The inspectors visited the Onsite Support Center (OSC). The OSC was observed to be configured as described in the licensee's emergency plan. The OSC also appeared to have the communications and emergency response equipment as specified in the emergency plan.
- The Emergency Operations Facility was visited, and the facility appeared well maintained and operational. Equipment described in the Emergency Plan was available and noted to be operable and within calibration. Resource materials such as plant procedures, the Emergency Plan and implementing procedures, maps, plant procedures, and electrical and piping instrumentation drawings were examined and noted to be available and up to date.
- The licensee's Emergency Kits, located in the Training Building, were examined and appeared ready for use. The kits were noted to be sealed indicating the kits had not been opened since inventory. However, it was noted that a plastic bag containing the seals used for the kits was left on the shelf with the kits. This subject was mentioned at the exit interview, and the licensee stated they will remove the plastic seals from this area.

Licensee performance in this program area appears decreased since the previous inspection in this area.

c) Organization and Management Control

This area was discussed, and the licensee has established a new management position which involved the Emergency Preparedness Program. The licensee has established a new position to provide oversight for emergency preparedness, safety, and health. The new position reports to the Assistant Plant Manager for Support Services, who reports to the Plant Manager. The Assistant Plant Manager for Support Services is a one year rotational position. The new position was established to ensure the continuity and oversight over the licensee's programs for safety, health, and emergency preparedness. The new position was very recently established and should benefit the Emergency Preparedness Program.

Licensee performance in this program area appears satisfactory.



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d) Training

The Emergency Plan and implementing procedures were reviewed; discussions were held with individuals responsible for emergency response training; and records of emergency response training were examined. The training records documented that training in emergency response was current and up-to-date. Records of individuals, who would become the Emergency Coordinator and other individuals holding key emergency response positions, were noted to be current and within their twelve month training period. The records documented that the individuals had also satisfactorily passed an examination as a method of verifying they understood the training. The licensee also uses a computerized tracking system which is tied into site access. Should an individual be recalcitrant in his training, the individual's site access would be pulled until training is completed. The licensee appears to be doing a good job of maintaining emergency response training.

Licensee performance in this program area appears fully satisfactory.

e) Drills and Exercises

Records of drills and exercises required by the Emergency Plan were examined and discussions with individuals responsible for the emergency preparedness drill program were held. The following weaknesses were identified:

- ° There was no documentation to support collection of environmental sample media; e.g., water, vegetation, and soil as required by Section 8.1.3.1.e of the Emergency Plan for 1989 and 1990. This item was also observed to have been identified by the licensee during the 1989 annual audit of the Emergency Preparedness Program. However, it appears this item was closed based upon an improvement in the procedural guidance, even though the collection of environmental sample media had not been performed.
- ° The Emergency Plan, Section 8.1.3.1.(e), requires the use of the post accident sampling system (PASS) to be included in the Health Physics Drills annually. Records of drills for 1989 referenced the use of the PASS system during the 1989 exercise. However, no documentation was provided supporting the completion of the PASS analysis as part of the drills. According to members of licensee staff, when the PASS is operated as part of a drill or exercise, the exercises and drills have been terminated prior to completion of the PASS analysis.

Drill documentation for a June 14, 1990, semiannual drill was observed, and the inspectors identified the following problems:

- ° The objectives for the drill did not appear to follow the objectives described in the licensee's newly issued Emergency Plan Administrative Procedure entitled, "Emergency Plan Drills." The new procedure was issued on May 22, 1990.

- o The drill summary to plant management related the observations that, "Coordination and communications between the emergency facilities were good." However, the review of the drill notes identified at least 20 separate references to problems relating to coordination or communications. These problems did not appear to have been captured in the drill summary or the action initiator tracking log used by emergency preparedness. The reason given for this was that the drill procedure allowed 90 days to enter drill findings into this system.

The above problems were discussed with members of licensee management, and they stated the above problems appeared to have been caused by a number of different groups being responsible for conduct of certain types of drills and a lack of procedural guidance. The licensee described the adherence to the new Emergency Plan Administrative Procedure for drills and exercises and the oversight of the drill program by the new manager for Safety, Health, and Emergency Services, as a remedy for the above stated weaknesses. The failure to perform drills required by Section 8 of the Emergency Plan was not cited because the criteria specified in Section V.A. of the Enforcement Policy had been satisfied (90-21-01).

The findings in this program area indicate declining performance since the last inspection in this program area. Further management oversight appears necessary

f) Independent Reviews/Audits

10 CFR 50.54(t) requires the licensee to perform an audit of their Emergency Preparedness Program by persons having no responsibility for the program. The inspectors reviewed the audit, Audit 90809T, which was conducted in May 1990, to meet this requirement. The audit team consisted of two contractors and three PG&E QA employees and were noted to be independent of the Emergency Preparedness Program. The audit appeared to address all of the items listed in 10 CFR 50.54(t). The inspectors identified one instance where a finding from a previous audit, Q0006592, was closed based on a procedure change. This issue is discussed in Section 3.e of this report.

4. Exit Interview (30703)

The inspectors met with the licensee representatives denoted in Section 1 on August 17, 1990, and summarized the scope and findings of the inspection. The licensee was apprised of the inspectors concerns regarding the maintenance and operability of the TSC and of the failure to provide documentation supporting the completion of the drills required by the Emergency Plan. The inspection resulted in one NCV. Other items discussed during the meeting are described in Section 2 and 3 of this report.

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