

U.S. Nuclear Regulatory Commission  
Region I

Report No. 50-244/88-14

Docket No. 50-244

License No. DPR-18 Priority \_\_\_\_\_ Category C

Licensee: Rochester Gas and Electric Corporation  
89 East Avenue  
Rochester, New York 14649-0001

Facility Name: Robert E. Ginna Nuclear Power Plant

Inspection At: Ontario Township, Rochester and Webster, New York

Inspection Conducted: July 26-29, 1988

Inspector: *C. G. Amato* 9/27/88  
C. G. Amato, EPS, FRSSB, DRSS date

Approved By: *W. J. Lazarus* 9/27/88  
W. J. Lazarus, Chief, EPS, FRSSB, DRSS date

Inspection Summary: Inspection on July 26-29, 1988 (Inspection No. 50-244/88-14)

Areas Inspected: Routine, announced, safety inspection of the licensee's  
Emergency Preparedness Program, Emergency Response Facilities and Emergency  
Preparedness Training Program.

Results: One violation was identified. There were no deviations and there  
were three unresolved items.

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## DETAILS

### 1.0 Persons Contacted

The following personnel attended the exit meeting.

- C. R. Anderson, Manager, Quality Assurance
- D. W. Burke, Corporate Emergency Planner
- D. E. Eilion, Radiochemist
- D. L. Filhins, Manager, Health Physics and Chemistry
- R. C. Mecredy, Director, Engineering Services
- B. R. Quinn, Corporate Health Physicist
- B. A. Snow, Superintendent, Nuclear Production
- S. M. Spector, Superintendent, R. E. Ginna Nuclear Station

The inspector also observed the actions of, or interviewed other personnel.

### 2.0 Emergency Preparedness Organization

- 2.1 Emergency Preparedness (EP) is an activity at Rochester Gas and Electric for which one individual, the Corporate Emergency Planner (CEP), is responsible. The CEP is not located at the Ginna site but rather at the executive office in Rochester some distance from the site. The CEP is one of seven individuals reporting to the Director, Engineering Services. The CEP does not have full or part time dedicated clerical or administrative support. Currently, the CEP is supported by a contractor employee on about a half time basis. Additional support is provided by headquarters and site organizational units.
- 2.2 The inspector identified at least 45 recurring activities the CEP must undertake on an annual basis to maintain EP at Ginna and the Corporate offices. Some of these activities involve interfaces with the State and County governments and these in addition to others are not easily scheduled. One recommendation of an internal audit commissioned by the licensee is to expand the EP function to four individuals with clerical support and assigning at least one of the four individuals to the site.
- 2.3 The CEP has announced his retirement plans; he will retire in about 20 months. The licensee's management has stated a successor will be assigned to this position so there is at least a year's overlap before the incumbent CEP leaves.

Although there is a concern regarding the level of staffing, performance has been acceptable. This area will be carefully evaluated as changes occur over this next two years.



### 3.0 The Emergency Operation Facility Status

- 3.1 The Emergency Operations Facility (EOF) is located in the basement of an Annex to the Corporate Headquarters. Two rooms and a Communications Bay extend from the building line beneath the sidewalk to the curb line. The Rochester City Government, in keeping with a master plan, will rebuild streets and side walks in center Rochester including the street and side walk in front of the building housing the EOF. This will result in the ceiling for the rooms and bay noted above being uncovered creating a potential safety hazard and rendering part of the EOF inoperable.
- 3.2 The affected area contains the EOF Manager's Conference room and FEMA/NYS room. Phone lines in the bay do not include the NRC Emergency Notification System (ENS). The licensee will relocate phones without interrupting service and also relocate the two rooms. A temporary wall will then be built to seal off the impacted area. These steps should insure EOF availability and maintenance of the 1988 exercise schedule. The licensee agreed to advise the NRC in writing as to the progress of these changes. These changes will be evaluated in the upcoming exercise.

### 4.0 Independent/Reviews Audits

- 4.1 10 CFR 50.54(t) requires power reactor licensees in the area of emergency preparedness to: perform a review/audit at least every 12 months, with a part of this audit including determination of the adequacy of the State and local government interface and make available the results of the interface determination to the State and local governments. Based on a review of audit records the licensee failed to evaluate the interface adequacy for four of the seven years these reviews/audits were conducted and, further, did not make results available to New York State and the Counties of Monroe and Wayne except for one year of the seven reviewed. The 1988 review/audit had been completed prior to this inspection and did not address the adequacy of the interface between the state and local government and the Licensee. When this omission was called to the attention of licensee management, the review/audit was reopened and completed prior to the conclusion of this inspection. Results were made available to the State and Counties. In response to NRC initiatives, the scope and quality of this review/audit was expanded and improved. This is identified as a violation. (50-244/88-14-01)

### 5.0 Emergency Response Facilities (ERFs)

- 5.1 Inspections were performed of the EOF, Technical Support Center (TSC), Operations Support Center (OSC) Emergency Survey Center (ESC), Control Room and the Media Center. The inspector verified



that plans and procedures were current, equipment and communications systems were checked for operability and equipment was in calibration. No inadequacies were identified.

- 5.2 Eighteen different sets of Plans and Procedures comprise the Nuclear Emergency Response Plans (NERP) for Ginna; those relating to EP are designated Station Contingency (SC) procedures. SC procedures were reviewed and found to be current. Monitoring equipment was found to be operable and within the calibration window. Field sampling procedures require collection of an air sample for ten minutes at a rate of 30 liters per minute. The licensee could not state the basis for this collection volume and rate and agreed to locate and review it to determine if volume and collection could be reduced for given efficiencies and statistical performance specifications. This item is unresolved. (50-244/88-14-02)
- 5.3 The Media Center or Joint News Center is a dedicated facility located in the basement of Corporate headquarters. Five rooms are provided for government use including the NRC. The press briefing room will seat about 250; 12 press phones are provided. Plant schematics, maps etc. are wall mounted. There is an Emergency Broadcast System (EBS) room and an area dedicated to rumor control which will accommodate a staff of seven. Media procedures are reviewed annually, a media briefing packet is available and the 1988 Media briefing meeting has been held. No inadequacies were identified.
- 5.4 The EOF is divided into seven areas and rooms; there are 68 phones including NRC's ENS and N.Y. State's Radiological Emergency Communications Systems (RECS). The dose assessment area is small and was crowded during the July drill. Four dose projection methodologies are available: hand calculations; over-lays normalized to unit release for each stability category; a PC using software called Symphony; and a vendor system known as Meteorological Information Dose Assessment System (MIDAS). The PC software is based on a straight line Gaussian and is classified as an extended Class A Model; the software is also capable of doing a plume segmented calculation. Midas is a Class B model and can handle deposition calculations. Site data, in this case, may be imported at vendor's remote terminal.
- 5.5 Severe Accident Analysis and Core Damage assessment (CDA) will be done at the EOF. Procedures for CDA are available and are based on PASS data. A Protective Action Recommendation Board and a Classification are wall mounted in the EOF. No inadequacies were identified.



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- 5.6 EOF Operating Procedures are not subject to review by the Plant Operating review Committee or Quality Assurance. Rather, they are reviewed by a Milestone Committee. The Inspector could not locate a basis for this committee in the License or Technical Specifications. This item is unresolved. (50-244/88-14-03)

## 6.0 Off-Site Activities

- 6.1 Approximately, 34,000 emergency information brochures, in the form of calendars have been distributed. A full page insert appears in the NYNEX yellow pages for Rochester and Wayne County. Transient briefing material has been prepared.
- 6.2 Ninety six sirens are located in the 16 Emergency Response Planning Areas. In addition, 47 Tone Alert Radios have been distributed. Verification systems are being installed on 23 of the sirens. During 1987, siren availability was 97%. All eight of the Tone Alert Radios which malfunctioned have been replaced. Results have been sent to the NYS Radiological Emergency Preparedness Group (REPG) for re-transmittal to US Federal Emergency Management Agency, Region II.
- 6.3 Surface water clearance procedures have been developed which are implemented by the U.S. Coast Guard and The County Sheriff. Per Letter of Agreement, NYS will advise the Ontario Provincial Government of an incident at Ginna.
- 6.4 Evacuation Time Estimates were last updated in 1986. Road capacities, ETEs for residents and transients were developed using seven scenarios including peak season and winter snow conditions. Traffic Control Points were identified, evacuation routes outlined and consideration was given to migrant workers, hospitals, parks and special care facilities.
- 6.5 Emergency Action Level Classification and Protective Action Recommendations were discussed with off-site authorities.
- 6.6 Off-site training is the responsibility of a number of different organizations. A contractor provides training for support hospitals and ambulance crews, Plant Safety trains fire-fighters, and NYS REPG is responsible for the Sheriff's Deputies. 1988 training is on-going.
- 6.7 Letters of Agreement with off-site entities were reviewed and appear current.



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Based on the above this portion of the licensee's Emergency Preparedness Program is adequate.

7.0 Emergency Operating Procedures (EOPs), Emergency Action Levels (EALs), and Protective Action Recommendations (PARs)

- 7.1 EOP E-0 contains a referral to Classification and Notification procedures; referrals appear in Administrative Procedures. EOPs do not go to core melt conditions.
- 7.2 Classification is based on events and symptoms; EALs are placed in one of 18 groups. Guidance in I&E Information Notice 83-28 is followed.
- 7.3 PARs may be based on plant conditions and comparison of projected doses with EPA's Protective Action Guides. Provision is made for a PAR following discussion between the EOF, site, off-site authorities, NRC, EOF, engineering and dose projectionists. PARs are made on an ERPA basis. PARs are consistent with federal guidance and the requirement of 10 CFR 50.47(b)(10) is met.

Based on the above, this portion of the Licensee's Emergency Preparedness Program is adequate.

8.0 Training

- 8.1 Site Training encompasses 11 programs at Ginna and is divided into three groups: Ginna; Maintenance; and Technical-Support-Management (TSM). EP training with the exception of EOF operations is included within this program. Each employee each year must develop a Job Plan, one element of which requires 100% completion of all required training. Employees are rated by comparing performance against the Job Plan. When a training module is scheduled, an alternate date is also selected. Additional make-ups were given to compensate for nonattendance during scheduled sessions. Exams are given and records are retained. Last year, the average grade was 97%.
- 8.2 There are 38 Emergency Response Organization (ERO) positions and 19 associated lesson plans and modules. PAR training was given during May 1988. Maintenance is 100% qualified and all but two TSMs are qualified. A lesson plan exists for CDA; there is no lesson plan for severe accident analysis. Operators receive EP training including classification and notification. Emergency communication equipment is being installed in the simulator for future training use. There are at least three qualified managers for each ERO key position.



Based on the above, this portion of the Licensee's Emergency Preparedness Program is adequate.

#### 9.0 Unusual Event Declaration

9.1 On July 16, 1988, Substation 13A, the preferred power source, was lost. Procedures were followed and a UE was correctly declared. Timely notification was given to the State and Counties plus the NRC. Security officers who heard the noise of the substation breaker tripping, reported it to the Control Room as a possible explosion in accordance with Security procedures.

Response to this event was prompt and correct.

#### 10.0 Training Drill

10.1 The resident inspector and the EP inspector observed training drill activities at the TSC and EOF. The inspectors concluded that the drill was effective training and in identifying areas for improvement.

#### 11.0 Meteorological (MET) Tower Sensor and Vent Monitor Calibration

11.1 The primary and two back-up MET towers were located and sensor calibration records for wind velocity and temperature sensors were reviewed as were data for electronic calibration. The most recent calibration was completed July, 1988. Calibration for monitors which may measure accident releases were also checked. The calibration for 1988 had been completed but the report had not been released.

Based on the above, calibration procedures are in place and a calibration schedule is being followed.

#### 12.0 Default Values

12.1 Under certain accident conditions, data permitting determination of an I/NG ratio may not be immediately available. A default value of 0.0001 will be used for non-steam releases and 0.01 for steam releases. If release duration cannot be estimated, a value of four hours is to be used. However, some plant procedures specify other values. The State and Counties have indicated they expect consistency in these areas and will not accept long time release duration estimates. This matter is unresolved and will be subject to a future inspection. 50-244/88-14-08



### 13.0 Exit Meeting

The inspectors met with the licensee personnel listed in Section 1 of this report at the conclusion of the inspection. The licensee was advised one violation was identified, three unresolved items were identified, and there were no deviations. The inspectors also identified areas for improvement. The licensee acknowledged these findings and agreed to evaluate them, institute corrective actions as necessary and include corrections in the Plan and Procedures. At no time during the course of the inspection did the inspectors give the licensee written material.

