

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

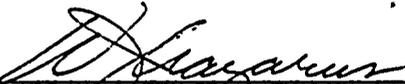
Report No. 50-244/87-12
Docket No. 50-244
License No. DPR-18 Priority -- Category C
Licensee: Rochester Gas and Electric Corporation
49 East Avenue
Rochester, New York 14649

Facility Name: R. E. Ginna Nuclear Power Plant

Inspection At: Ontario and Rochester, New York

Inspection Conducted: April 27-30, 1987

Inspectors:  5/7/87
C. Conklin, Emergency Preparedness
Specialist, EP&RPB, DRSS date

Approved by:  5/7/87
W. J. Lazarus, Chief, Emergency
Preparedness Section, EP&RPB, DRSS date

Inspection Summary: Inspection on April 27-30, 1987 (Report No. 50-244/87-12)

Areas Inspected: Routine announced emergency preparedness inspection. The inspection areas included: changes to the Emergency Preparedness Program; emergency detection and classification; protective action decision-making; notifications and communications; Security/Operations interface during emergencies; and follow-up on previously identified inspection findings.

Results: No violations were identified.



DETAILS

1.0 Persons Contacted

J. Alder, Control Room Foreman
*C. Anderson, Manager, Quality Assurance
R. Beldue, Shift Supervisor
*R. Brown, QA Specialist
*D. Burke, Corporate Emergency Planner
*D. Grandjean, Superintendent Power Plant Maintenance
R. Marchionda, Training Manager
K. McCarthy, Shift Supervisor
*R. Mecredy, Director, Engineering Services
*R. Morrill, Technical Assistant
*B. Quinn, Corporate Health Physicist
*R. Smith, Chief Engineer
*S. Spector, Plant Superintendent
H. Van Haute, Shift Supervisor
*R. Watts, Consultant
R. Wood, Supervisor Nuclear Plant Security

The inspector also interviewed and observed the activities of other licensee personnel.

*Denotes those present at the exit interview

2.0 Licensee Action on Previous Inspection Findings

During the inspection, the inspectors reviewed the licensee's progress concerning the items opened during a previous inspection (Inspection Report 50-244/86-12). The status of these items is as follows.

- (CLOSED) 50-244/86-12-01: Provide sufficient staff and training to meet all Table B-1 staffing and augmentation goals.

The following documents were reviewed: SC-600, Emergency Plan Qualification and Notification; SC-605, Site Contingency Call List; various Nuclear Emergency Off-site Response Procedures; monthly pager test results; and Off Hours Telephone Alert Tests.

A review of key positions in the Technical Support Center (TSC) and Emergency Operations Facility (EOF) revealed that there are at least three individuals assigned to each emergency position. Many of the individuals continue to be cross trained for several key positions. Telephone calls are performed by the Gas Dispatcher and the Telephone Service. Key EOF positions initiate individual call trees. Radio pagers are available for key positions as a backup means of notification. The installation of an autodial system has been recommended, however this is presently on hold. Tests of the radio pager system are conducted monthly, with adequate follow-up and corrective actions for problem areas. Off-hours telephone alert drills were conducted on January 7, March 3, and April 6, 1987. The licensee met their staffing objectives in



each drill. The Emergency Plan is being revised to include unannounced quarterly off-hours telephone alert drills. The inspector discussed with the licensee the following areas where improvements could be made: improve the training for the Gas Dispatchers and Telephone Service; add a response time column to the telephone test call-in log; consider formalizing the use of the pagers, including the turnover to alternates; and consider consolidating all the procedures utilized for call in.

Based upon the above review, this item is acceptable.

- (CLOSED) 50-244/86-12-02: Define minimum training requirements for each EOF position and evaluate present training records system to ensure training verification.

The licensee has developed training matrices for both on-site and off-site personnel. These matrices are further developed for initial training and annual retraining. The off-site lesson plans reviewed were current and approved by the Emergency Planning Coordinator (EPC). The on-site lesson plans reviewed were current and approved by the Training Manager, however a review committee which includes the EPC, reviews all on-site lesson plans prior to approval. There are examinations for each lesson plan, as well as scheduled walk-throughs and drills. A one time read and sign program was conducted to assist the large addition to the emergency staff. The current training cycle is in progress, with completion scheduled by October 1987. Procedures are in place to disqualify personnel who do not successfully complete training. The training records are accessible and easy to use. The inspector was easily and quickly able to determine individual training status. The inspector noted that there is no passing criteria stated for the off-site program. Additionally, the training matrices need to be reconciled between on-site and off-site modules. The licensee agreed to correct these items.

Based upon the above review, this item is acceptable.

- (OPEN) 50-244/86-12-03: Evaluate the QA audit process for its effectiveness in identifying shortcomings in the emergency preparedness program.

The inspector interviewed personnel from the QA group responsible for conducting the emergency preparedness audits. An action plan has been established to ensure that the previous weaknesses are corrected. The 1987 audit has not been conducted, however work has been started on the audit checklist and makeup of the team. The inspector noted that team members with technical expertise in emergency preparedness are being considered, and recommended that this action occur. This item will be evaluated in a subsequent inspection.



- (OPEN) 50-244/86-12-04: Establish on-site maintenance responsibilities in the emergency plan and evaluate methods to ensure the EPC is cognizant of on-site actions.

The on-site maintenance responsibilities, and subsequent Emergency Preparedness Coordinator (EPC) review mechanisms are being addressed in a revision scheduled for May 1987. The inspector noted that the EPC is a member of the Radiation Emergency Preparedness Implementing Procedure Committee, and as such reviews all procedures related to emergency preparedness prior to Plant Operations Review Committee (PORC) approval. The inspector recommended that the licensee evaluate the means to increase the EPC's visibility on-site. This item will be evaluated in a subsequent inspection.

3.0 Operational Status of the Emergency Preparedness Program

3.1 Changes to the Emergency Preparedness Program

There have been no significant or major changes to the licensee emergency preparedness program since the last inspection. Changes which have taken place have been minor and have not adversely affected the licensee's overall state of emergency preparedness. The licensee has appropriate procedures and mechanisms in place to assure that changes to the plan and procedures which could affect the overall state of emergency preparedness will be detected. All changes to the emergency plan and implementing procedures receive review by PORC, approval by station management, and distribution in accordance with approved procedures and NRC requirements prior to implementation. The inspector noted that the licensee presently does not mark revisions to show where changes have been made. Additionally, the activation procedures for the various facilities do not state the minimum functional criteria necessary for activation. The licensee agreed to review these areas.

Based upon the above review, this area is acceptable.

3.2 Emergency Detection and Classification

The inspector reviewed the licensee's Emergency Action Levels (EALs) and found them to be in accordance with the regulations and NRC guidance. A review of the Emergency Operating Procedures (EOPs) refer the operators to the EALs as appropriate. Documentation is available detailing the review of the EALs and associated protective action recommendations with the local authorities. The inspector also attended an EAL training session for EOF personnel and found it complete and well presented. The inspector noted that the EAL sets are inconsistent in the use of numbering and in the use of terminology ("and", "or" and "with"). Additionally, the format of the EALs should be evaluated from a human factors standpoint. The licensee agreed to review these areas.



The inspector interviewed several individuals in the emergency organization on a sampling basis. Four senior licensed individuals who may be called upon to be Emergency Coordinator were chosen. Scenarios were chosen to provide events with security implications and a fast breaking event, and were given to each individual. Detection, recognition and classification was prompt and correct for the given situations. Notifications, and any associated protective action recommendations, would have been prompt. The operators were aware of the safety implications of events caused by sabotage. There are security procedures in place and the operator/security interface is established and adequate. There were minor inconsistencies between operators on dealing with events with security implications. Additionally, both in the walk-throughs and the EAL training session, the personnel using the EALs tended to use them from the least classification to the highest, and in many cases stopped their evaluation when the EAL met the given conditions. Training should stress the use of the EAL tables from the highest classification to the least, thereby ensuring classifications are correct. The licensee has agreed to provide additional training to address these areas.

Based upon the above review, this area is acceptable.

3.3 Protective Action Decision-making

The following documents were reviewed: SC-240, Protective Action Recommendations; SC-420, Estimating Off-site Doses; SC-421, Determination of Iodine or Particulate Activity; SC-422, Hypothetical (Pre-release) Dose Estimates; and SC-604, General Emergency.

The licensee has a 24-hour capability to assess and analyze plant conditions and make appropriate recommendations to off-site authorities. The Shift Supervisor/Emergency Coordinator makes the initial protective action recommendation (PAR). These PAR's can be based upon plant conditions or projected dose and are based upon EPA guidance. In the event release rate information is not readily available, default release estimates are contained in the procedure. Subsequent PAR's and updates are made by the TSC or EOF staff when activated.

Based upon the above review, this area is acceptable.

3.4 Notifications and Communications

Procedures and equipment are in place to notify both on-site and off-site organizations on a 24-hour basis. The content of the notification messages is consistent with the New York State reporting form. Telephone numbers are updated quarterly. Additionally, the inspector observed the licensee verify several backup communication capabilities.



Based upon the above review, this area is acceptable.

3.5' Security-Operations Interface During Emergencies

Discussions were held with the Ginna Supervisor of Nuclear Plant Security. The purpose of the discussions was to determine the interface, interaction and the degree of integration of the station security program with the emergency preparedness program. All security officers receive General Employee Training, Safeguards Contingency Plan Training, Physical Security Plan Training, and Radiological Emergency Plan Training. Security personnel are also assigned membership on the plant fire brigade; emergency plan training for security officers covers security plan access for emergency vehicles, accountability, and anti-sabotage procedures. All security officers are required to requalify annually. Training records, test scores and security program activity records are maintained by the Security Department.

Based upon the above review, this area is acceptable.

4.0 Exit Meeting

The inspector met with the licensee personnel denoted in Section 1 at the conclusion of the inspection. The licensee was informed that two items identified in previous inspections were closed. The remaining open items will be evaluated in a subsequent inspection. The inspector also discussed some areas for improvement. The licensee acknowledged the findings and agreed to evaluate them and institute corrective actions as appropriate.

