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SUBJECT: Forwards Emergency Preparedness Branch analysis of
 emergency action levels identified in event classification
 Procedure EPIP 13.1.1, during Insp Rept 50-397/87-12 on
 870518-22.

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FEB 4 1988

DOCKET NO. 50-397

Washington Public Power Supply System
P. O. Box 968
3000 George Washington Way
Richland, Washington 99352

Attention: Mr. G. C. Sorensen, Manager
Regulatory Programs

Gentlemen:

Our May 18-22, 1987, inspection identified some concerns with certain Emergency Action Levels (EALs) in your event classification procedure No. EPIP 13.1.1. These concerns were documented in Detail Sections 6 and 7 of Inspection Report No. 50-397/87-12. With respect to these concerns, we had committed to submitting them to our Emergency Preparedness Branch in Bethesda, Maryland, for their review and evaluation.

We have received the Emergency Preparedness Branch's evaluation and have enclosed their analysis for your information. This analysis was discussed on February 2, 1988, during a telephone conversation between Mr. Ray Fish of my staff and your Mr. G. D. Bouchey. Based on the February 2 discussion, it is our understanding that you will review the enclosed analysis and take corrective action you deem appropriate. We would be willing to hold an additional telephone discussion or arrange for a meeting, if you believe it necessary, to finally resolve this matter.

Sincerely,

RS
Ross A. Scarano, Director
Division of Radiation Safety &
Safeguards

Enclosure as stated

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cc w/enclosure

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Analysis of WNP-2 Emergency Action Levels (EALs)

Conclusion 1: The licensee's fire EALs are deficient when compared to NUREG-0654.

Analysis: The following is a comparison between the NUREG-0654 example initiating conditions for fire and the licensee's fire EALs (EPIP 13.1.1 dated 4/13/87).

<u>Event</u>	<u>NUREG-0654</u>	<u>Licensee's EAL</u>
UE	Fire within the plant lasting more than 10 minutes.	A fire in a safety-related portion of the Protected Area requiring activation of the Plant Emergency Team (fire brigade).
Alert	Fire potentially affecting safety systems.	A fire affecting a safety system.
SAE	Fire compromising the functions of safety systems.	Fire affecting safety systems to the point of inadequate control of the plant.
GE	Any major internal or external events (e.g., fires, earthquakes, substantially beyond design basis) which could cause massive common damage to plant systems resulting in any of the above.	Any conditions that warrants the activation of the Technical Support Center, the Operations Support Center, and the Emergency Operations Facility for accident assessment, in-plant response, and offsite emergency response to aid in the implementation of protective actions. Examples include the following: A security compromise resulting in the total loss of control of the plant.

NOTE: A summary of symptomatic and situation based initiating conditions can be found in Attachments B and C, respectively

In NUREG-0654 the example of an Unusual Event for a fire is crisp, non-judgemental and unequivocal. The licensee's unusual event classification is based on a

secondary action i.e., response to the fire by the fire brigade. It requires judgement i.e., is the fire in a safety related portion of the protected area? Finally, it has a threshold that is too high i.e., safety-related portion of the protected area. 10 CFR Part 50 Appendix R contemplates the adverse impact of fire to equipment that is: (1) safety-related (2) important to safety but not safety-related, and (3) non-safety related. Unless the design of the plant is such that fires in areas housing equipment in categories #2 and #3 will not impact the safety-related equipment, the threshold in the EAL is too high.

The words "potentially affecting a safety system" in the example of an Alert for a fire in NUREG-0654 are more conservative than "affecting a safety system" which is the licensee's Alert for a fire. As pointed out by the region, the licensee's Alert for a fire is close to the example of a Site Area Emergency in NUREG-0654.

The words "compromising the functions of safety systems" in the example of a Site Area Emergency in NUREG-0654 are more conservative than the licensee's Site Area Emergency for a fire. The licensee's words "to the point of inadequate control of the plant" is philosophically closer to a general emergency. More importantly, it is ambiguous and requires more judgement than the NUREG-0654 example.

The licensee's General Emergency for a fire is not explicit. The EAL cited would seem to encompass a fire but it is apparently redundant with both the NUREG-0654 example for a Site Area due to staff augmentation and the licensee's EAL for a Site Area Emergency due to staff augmentation.

Conclusion 2: The licensee's EAL for the Unusual Event EAL relating to technical specifications is deficient when compared to NUREG-0654.

Analysis: The example initiating condition in NUREG-0654 for the Unusual Event related to technical specifications is "other plant conditions exist that...require plant shutdown under technical specification requirements or involve other than normal controlled shutdown..." Some licensee's EALs require reporting when shutdown commences, others require reporting if cold shutdown is reached before the initiating event is resolved (We have accepted both). The licensee's EAL for the Unusual Event related to technical specifications is:

Any plant condition requiring plant shutdown as a result of exceeding the limiting conditions for operation and associated action items, (as defined in the WNP-2 Technical Specifications) and is of immediate safety concern or where other than a normal controlled shutdown takes place...(emphasis in original)

The licensee's EAL is less conservative than the NUREG-0654 example. The qualifier "and is of immediate safety concern," which is also included in the licensee's definition of an Unusual Event, requires judgement that could take extra time and could result in variations in classification. It could also undermine licensee or NRC efforts to control the quality of reporting. In its own review of emergency procedures dated September 11, 1987, Subject: Emergency Action Level Incident Classification Assessment," the licensee points to three Licensee Event Reports that would have been classified as Unusual Events

under NUREG-0654 criteria but the EPIP guideline judgement would permit the event from not being classified.

Specifically they were:

LER 87-002	RFW < LoLo Level Action
	ECCS Injection to Reactor
LER 85-004	Turbine Valve Fast Closure
	ECCS Injection
LER 84-008	Low Supp Pool Level 4 3/4"

None of these events were classified by the licensee as an Unusual Event.

Conclusion 3: The licensee's entire EAL scheme is undermined by the superposition of the ambiguous criterion of "judgement" or "professional judgement" which is to be applied by the decisionmaker after a technical assessment has been made.

Analysis: The licensee's EAL scheme has symptomatic initiating conditions backed by situation (or event) based initiating conditions. This is the kind of EAL scheme that we encourage. However, all of the EAL criteria are undermined by the introduction of an additional step after the technical assessment has been made. Specifically, the following statement appears in a box on the first page of EPIP 13.1.1:

Caution: This procedure is only a guide to emergency classification. The final consideration in all classifications is one of judgement on the part of the Plant Emergency Director.

Additionally, another warning appears in a box on the first page of Attachment A "Guidance For Classifying Emergencies":

Caution: This procedure is only a guide. Proper judgement based on a "safety first" principle must be used as the final consideration for all classifications.

Additionally, each Action Level is introduced with the sentence: "If any of the following conditions exist, consider declaring an ____."

All of the above results in the criteria not being sufficient in themselves for a declaration of an event. Further, the term "safety first" is not defined in the EPIP. Additionally, the Plant Emergency Director and the Operations Manager are instructed in the EPIP to use "professional judgement" along with the criteria for classification.

In its own review of emergency procedures dated September 11, 1987, Subject: "Emergency Action Level Incident Classification Assessment," the licensee states:

A major difference between the Emergency Plan and the EPIP states that both symptoms and situations are guidelines only and subject to the judgement of the responsible Emergency Director. The Emergency Plan indicates only situations are guidelines subject to judgement calls. It implies that symptoms cause automatic emergency classifications. NRR/NRC have reviewed both documents without commenting on the difference; however, the Plant should resolve the differences between the EPIP and Emergency Plan. (emphasis in original)

The staff believes that the introduction of "judgement" or "professional judgement" into the EAL scheme on top of the basic determination of whether a technical criteria is met, undermines the purpose of having predetermined criteria for EALs. Some technical judgement may be required to determine if technical criteria have been met but the addition of "judgement" or "professional judgement" after the technical criteria have been deemed to be met could be a disservice to the person responsible for classifying the emergency. After determining that technical criteria have been met, the person must apply some additional, ill defined, subjective judgement before making the ultimate classification. The opportunity for others to second guess this additional, subjective "judgement" may delay or prevent a proper classification. Application of this "judgement" by different persons could result in different classifications, which is of safety concern. This additional subjective criteria could also thwart the licensee's or NRC's efforts to achieve reproduceable, high quality classifications. Finally, the staff believes that the EPIP "guidance" or "guidelines" for classifying an emergency should be based on firm criteria for classifying an emergency.

