

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/88-06

Docket No. 50-397

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

Facility Name: Washington Nuclear Project No. 2 (WNP-2)

Inspection at: WNP-2 Site, Benton County, Washington

Inspection Conducted: April 26-29, 1988

Inspector: *G. M. Good* 5/18/88
G. M. Good, Emergency Preparedness Analyst Date Signed
R. F. Fish 5/18/88
R. F. Fish, Chief Date Signed
Emergency Preparedness Section

Summary:

Inspection on April 26-29, 1988 (Report No. 50-397/88-06)

Areas Inspected: Unannounced, routine inspection in the area of Operational Status of the Emergency Preparedness Program (audit section) and follow-up on five open items identified during previous emergency preparedness inspections. Inspection procedures 82701 and 92701 were used.

Results: No deficiencies or violations of NRC requirements were identified.

DETAILS

1. Persons Contacted

R. A. Chitwood, Manager, Emergency Planning and Environmental Programs
J. D. Houchins, Emergency Planner
D. A. Kerlee, Principal Quality Assurance Engineer
A. F. Klauss, Senior Emergency Planner
D. H. Mannion, Senior Emergency Planner
G. O. Ray, Emergency Planner

2. Action on Previous Inspection Findings (Inspection Procedure 92701)

(Closed) Open Item (87-12-01): NRC inspection/exercise findings were not being tracked unless they were identified as open items. To verify licensee attention to this matter, the inspector pre-selected a number of inspection/exercise findings from two reports and proceeded to determine disposition. During this process, the inspector was informed that open items and concerns were now being tracked and the documentation maintained in Corrective Action Report (CAR) binders. A member of the Emergency Planning and Environmental Programs (EP & EP) staff is responsible for maintaining the CAR binders. After reviewing the CAR binders, the inspector concluded that; 1) a system to track NRC inspection/exercise findings has been developed and proceduralized; 2) there is still room for improvement in this area, since four of seven of the pre-selected findings had not been tracked (some attention had been given to two of these four), and; 3) the depth of the corrective actions described in the responses to the CARs appeared superficial and could be improved upon. This item is considered closed.

(Open) Open Item (87-20-01): Notifications to plant personnel were not made in complete accordance with EPIP 13.1.2 during the exercise. Emergency Plan Implementing Procedure (EPIP) 13.1.2, "Plant Emergency Director (PED) Duties", requires the PED to sound the alerting tone, make a public address (PA) announcement and then repeat the step. EPIP 13.1.2 also requires the PED to include information about hazardous areas in the PA announcements. These actions were not fully accomplished during the exercise. To correct this matter, EPIP 13.1.2 has been revised to allow the PED to delegate these actions to the Plant Administrative Manager (PAM)/Designee. This action was taken because it was determined that the PED can get too involved with event classifications, offsite notifications and protective action recommendations (PARs) to personally make the onsite notifications, since all of these actions tend to coincide with one another. EPIP 13.10.7 "PAM Duties" has also been revised. This corrective action appears appropriate; however, the inspector noted that no specific corrective action had been taken to address the content (i.e., information about hazards) of the PA announcements. This item will remain open pending demonstration of the licensee's ability to accomplish these actions during the next annual exercise.



(Open) Open Item (87-20-02): Information flow between and within the CR, TSC and EOF could be improved. NRC Inspection Report Number 50-397/87-20 catalogs a series of information flow problems identified during the licensee's 1987 annual emergency exercise. Examples were identified between and within the Control Room (CR), Technical Support Center (TSC) and Emergency Operations Facility (EOF). To determine the extent and progress of any corrective action, the inspector reviewed the CAR binder and obtained supplemental information during discussions with EP & EP personnel, including the Manager. Based on this review and the discussions, the inspector concluded that no specific corrective action was being taken since it was determined that procedural guidance was sufficient and that the problems identified were considered to be "performance deficiencies". It is important to note that NRC findings identified during exercises are discussed during refresher training provided to the licensee's emergency response personnel (ERP). During the refresher training, ERP will be reminded of the importance of effective communication. In addition, the licensee has formed a committee to look at the feasibility of using a network of personal computers (PCs) to enhance information flow between Emergency Response Facilities (ERFs) (e.g., CR, TSC, Operations Support Center (OSC) and EOF). This is considered to be a long range goal. The inspector could not conclude that the licensee's corrective action taken to date was sufficient enough to prevent the problem from recurring. This item will remain open pending demonstration of the licensee's ability to accomplish these actions during the next annual exercise.

(Open) Open Item (87-20-03): Accountability was not completed in a timely manner. According to the documentation provided in the CAR binder, this problem was attributed to a misunderstanding about when accountability is considered complete. Apparently some OSC personnel thought that accountability was not complete until the missing individuals were found, as opposed to just being identified as missing. Although it is conceivable that this may have had a significant influence on the timeliness of the accountability process, the licensee should determine whether there were any other factors (i.e. unnecessary delays built into the accountability process) that may have contributed to the problem during the exercise. Applicable procedures have been revised to clarify the meaning of accountability. This item will remain open pending demonstration of the licensee's ability to accomplish these actions during the next annual exercise.

(Open) Open Item (87-20-04): The program for MUDAC's utilization and control of field teams needs to be re-examined. During the last annual exercise, concerns associated with the Meteorological and Unified Dose Assessment Center (MUDAC)/field team coordination were identified (refer to Section 10 of NRC Inspection Report Number 50-397/87-20 for details). In response to this open item, licensee personnel determined the following:

- a. Current procedural guidance is adequate.
- b. MUDAC staffing is adequate.



- c. Concepts governing MUDAC/field team roles will be addressed during refresher training.

Based upon the licensee's current corrective action, the inspector could not conclude that the attention given to this matter was sufficient enough to prevent recurrence. This item will remain open pending demonstration of the licensee's ability to accomplish these actions during the next annual exercise.

3. Operational Status of the Emergency Preparedness Program (Inspection Procedure 82701)

a. Independent Review/Audit

This portion of the inspection was conducted to determine whether the licensee had performed an independent review of its emergency preparedness program at least every twelve months as required by 10 CFR 50.54(t). To accomplish this, the inspector held discussions with Quality Assurance (QA) personnel and reviewed QA reports/documentation, including responses to QA findings. The following documents were reviewed; Corporate Licensing and Assurance Audit 88-425, WNP-2 Emergency Preparedness Program, dated February 29, 1988, conducted January 18-29, 1988; Plant staff response to QA Audit 88-425, dated March 23, 1988, and; Support Services response to QA Audit 88-425, dated March 25, 1988.

Based on the documentation review and the discussions with QA personnel, the inspector concluded the following:

- i. The audit was conducted within the required time frame.
- ii. The scope of the audit was adequate; however, the inspector noted that the Post Accident Sampling (PASS) drill was addressed in the 1986, 1987 and 1988 audits. The licensee's Emergency Plan requires that six different drills (e.g., communication, medical and environmental monitoring) be conducted at various frequencies to develop and maintain key skills. During the 1986 audit, the auditors verified that all of the required drills had been conducted, in addition to examining the PASS training/qualification program. Since no other drills besides the PASS drill were evaluated in 1987 or 1988, the inspector concluded that the scope of the audits could be varied more from year to year.
- iii. The audit team's ability to evaluate Health Physics drills (environmental, PASS, etc.) could be limited because none of the team members had expertise in Health Physics and Chemistry. Licensee QA personnel did not perceive this to be detrimental; however, the qualifications of the auditors is an important component of any audit program. The licensee's method for determining auditor qualifications will be re-examined in greater detail during a subsequent inspection. This matter will be tracked as open item 88-06-01.

No deficiencies or violations of NRC requirements were identified during this part of the inspection.

4. Exit Interview

An exit interview was held on April 29, 1988, to discuss the preliminary findings of the inspection. The attachment to this report identifies the licensee personnel who were present at the meeting. During the exit interview, the inspector stated that it appeared there were no violations of NRC requirements identified. The inspector summarized the findings identified in Sections 2 and 3. During the exit interview, the inspector stated that she was concerned about the depth of the corrective actions taken in response to the matters that were reviewed during this inspection. Subsequent to the inspection, it was determined that the issue of the auditor qualifications would be treated as an open item.

ATTACHMENTEXIT INTERVIEW ATTENDEES

R. A. Chitwood, Manager, Emergency Planning and Environmental Programs
J. D. Houchins, Emergency Planner
A. F. Klauss, Senior Emergency Planner
D. H. Mannion, Senior Emergency Planner
R. D. Mogle, Senior Emergency Planner
G. V. Oldfield, Supervisor, Radiological Assessment
A. L. Oxsen, Assistant Managing Director for Operations
G. O. Ray, Emergency Planner
R. L. Romanelli, Senior Information Officer