

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-255/87010

Docket No. 50-255

License No. DPR-20

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Palisades Nuclear Power Plant

Inspection At: Palisades Plant Site, Covert, Michigan

Inspection Conducted: April 20-24, 1987

Inspectors: *James P. Patterson*
James P. Patterson,
Lead Inspector

May 11, 1987
Date

Marcia J. Smith
G. M. Christoffer
G. M. Christoffer

5/11/87
Date

William Snell
Approved By: William Snell, Chief
Emergency Preparedness Section

5/11/87
Date

Inspection Summary

Inspection on April 20-24, 1987 (Report No. 50-255/87010(DRSS))

Areas Inspected: Routine unannounced inspection of the following areas of the Emergency Preparedness Program: Changes to the Emergency Preparedness Program; review of emergency facilities/equipment, and required drills; organization and management control; training, including interviews with key emergency response personnel; examination of independent reviews/audits of the Emergency Preparedness Program; activations of the Emergency Plan; and licensee actions on previously identified items. The inspection involved observations on site by three NRC inspectors.

Results: No violations, deficiencies or deviations were identified as a result of this inspection. However, the licensee made a commitment to conduct two additional shift augmentation call-in drills in certain time spans as described in Section 5 of this report.

DETAILS

1. Persons Contacted

- *J. Lewis, Technical Director
- *P. Loomis, Emergency Planning Administrator - Corporate
- *D. Fugere, Emergency Planner, Corporate
- *W. Beckman, Radiological Services Manager
- *C. Kozup, Technical Engineer
- *J. Brunet, Emergency Planning Coordinator
- N. Brock, Emergency Planning Trainer
- *M. Dawson, Emergency Planning Technician
- *T. Neal, Staff Health Physicist
- *D. Malone, Nuclear Licensing Analyst
- *G. Yeisley, Quality Assurance Representative
- *P. Slaughter, Emergency Planner
- R. Fenech, Operations Superintendent
- K. Haas, Reactor Engineering Superintendent
- D. Joos, Plant Planning Director
- E. Polk, Plant Safety Coordinator
- K. Osborne, Shift Supervisor, Production Superintendent
- T. Kille, Shift Supervisor
- M. Genrich, Shift Supervisor
- J. Haverly, Security Training Instructor

*Denotes those attending the April 24, 1987 exit interview.

2. Licensee Action on Previously Identified Open Items Related to Emergency Preparedness

- a. (Open) Open Item No. 50-255/86015-01: The previous inspection identified some weaknesses in the shift augmentation call-in drills conducted since March 1986. Certain personnel in required positions needed for minimum shift staffing could not be contacted, or if they could be contacted, their estimated response time was well beyond the 30 minute and 60 minute recommended goals.

This topic has been expanded upon in Section 4.c. of this report. Licensee management has made a commitment to the Lead Inspector to conduct two more call-in drills within a stipulated time span as identified in the cover letter of this report. Until the evaluation of results of these drills and other corrective measures planned by the licensee can be made, this item remains open.

- b. (Closed) Open Item No. 50-255/86015-02: This item was noted in a previous inspection as a result of the use of procedures in interviews of those qualified as Radiation Protection Supervisor for the OSC. Procedures EI-7.1 and EI-8 specify 0.8 and 0.9, respectively for the stay time adjustment factors used for radiation exposure calculations. Revision and review of these procedures, as confirmed by the inspector, now both stipulate 0.9 in their Stay Time equation. This item is closed.

- c. (Open) Open Item No. 255/86019-01: This item concerns an observation that during the August 1986 exercise there was a lack of coordination of effort between Plant Security and the TSC staff, including the Site Emergency Director (SED). To alleviate this condition, an expanded training format with revised lesson plans has been formulated and added to the Emergency Preparedness (EP) related Plant Security training. The inspector briefly reviewed the new lesson plans and checked the training records of 14 security personnel who could have EP related assignments. The lesson plans have incorporated the new EP related information and the training records of the 14 individuals were satisfactory. All 14 had received the new enlarged EP training. This item cannot be closed until Plant Security personnel can demonstrate better coordination and integration with various emergency response facilities (ERFs) including the TSC and OSC. This will be evaluated based on future practice drills and emergency exercises. This item will remain open.

3. Emergency Plan Activations

The inspector selected for review eight of 37 Licensee Event Reports (LERs) that occurred between August 1986 and March 1987. One of these eight LERs, No. 87004, Lack of Boric Acid Injection Flow Path to the Primary Coolant System, involved in a Notification of an Unusual Event (NUE). This event was properly classified and notifications were made in a timely manner. Five other NUEs were identified for a total of six since the May 1986 inspection. These also were properly classified and notifications were made within the required times. Open Item No.'s now closed by these actions include No. 50-255/860XX-05, -10, -11, -12 and -13 plus No. 50-255/870XX-01.

4. Operational Status of the Emergency Preparedness Program (82701)

a. Emergency Plan and Implementing Procedures

All revisions of the Site Emergency Plan (SEP) submitted to the NRC during this inspection period were initially approved with one exception. Revision 6 to Sections 3, 4, 5 and 6 of the SEP omitted Table 4.3 of Section 4. This Table 4.3 consisted of the plant's Emergency Action Levels (EALs). Since omission of these EAL tables would decrease the effectiveness of the plan, the licensee agreed to reinsert them into the SEP as part of Revision 7. This Revision 7 was approved in a letter to the licensee dated April 8, 1987.

The inspector reviewed the licensee's provisions for preparing, reviewing, approving and distributing new and revised emergency implementation procedures (EIPs) and found them acceptable. Currently the Document Control Section at Palisades does not include a method for documenting the dates of SEP and EIP revisions sent to NRC-Region III. These revisions are sent to Region III with a computer printout sheet identifying the change and instructing the receiver to discard certain pages or the whole procedure, reinsert the new change, sign and date the sheet and return it.

A check of the receiving log kept at the Region III's Incident Response Center confirmed to the inspector that both SEP and EIP revisions were submitted to the NRC within 30 days of their issuance. However, the licensee has agreed to devise a method by which their Document Control Section can document that these changes are sent to the NRC within 30 days after the changes are issued.

The current SEP and EIP summary page cover sheets have not all been converted to specify periodic review rather than biennial or annual. The schedule is to complete this process by April 28, 1987 according to information obtained by the inspector.

Communication tests with the three County Emergency Operations Centers (EOCs) are made on an annual basis when the EOCs are activated on instructions from the County Sheriff's Department to the County's Director of Emergency Preparedness. The latter has the authority to activate the EOC per Sections 5.7.4, 5.7.5, and 5.7.6 of the SEP. These annual communications tests have not been documented, however.

Thus, as presently stated in the SEP, Sections 5.7.4, 5.7.5 and 5.7.6 have some incongruity with Sections 8.1.2 which requires an annual EOC communications test. Telephone communications tests were being conducted quarterly with Van Buren, Berrien and Allegan County Sheriff's Office. Any references in implementing procedures to communications tests for offsite County EOCs should be clarified for operational consistency (Reference EI-15-2, Attachment 2) between the SEP and EIP's. Until these references relating to EOC communications tests are removed and the EIPs and the SEP are in clear agreement, this will be tracked as Open Item No. 50-255/87010-01.

Based on the above findings, this portion of the licensee's program is adequate; however, the following items should be considered for improvement.

- The Site Emergency Plan and related Emergency Implementation Procedures should be reviewed and revised to eliminate statements referring to the testing of the County EOC telephones, as previously described in this section of the report.
- The licensee should complete the revision of SEP and EIP summary pages cover sheets to specify the requirements for periodic review of both documents, rather than biennially. This same improvement item was identified in the May 1986 inspection (Report No. 50-255/86015).

b. Emergency Facilities, Equipment, Instrumentation and Supplies

There have been no major changes to the emergency response facilities (ERFs), equipment, or instrumentation since the previous inspection. One minor change which began during this inspection, was the conversion of the dedicated EOF area at the South Haven

Conference Center to a full-time conference room area. The EOF equipment including status boards and other material will be stored in a locked room adjacent to the EOF. From there it will be retrieved, mounted or put in place each time the EOF is activated. Staffing of the EOF during an emergency will be changed from a majority of General Office Response Team (GORT) personnel to a majority being plant personnel. Licensee personnel indicated that after physical equipment changes, new activation procedures, and related training the revised EOF will be ready for use prior to the May 1987 exercise.

Emergency equipment storage kits, decontamination kits, self-contained breathing apparatus (SCBA) locker, telephones, and computer terminals were examined and found to be operational in the Control Room, TSC, and EOF.

c. Organization and Management Control

There have been no major changes to the licensee's emergency organization or management control systems. However, the EPC is scheduled to begin training approximately July 1, 1987 to qualify as a Duty Health Physicist (a new position). This will be a collateral assignment, and while his new duties develop, especially during outages, the EP Technician assisted by a Staff Health Physicist will manage the EP program and carry out the EPC's responsibilities.

The secondary or back-up hospital for Palisades is being changed to Memorial Hospital, St. Joseph, Michigan within the next month. South Haven Hospital will remain the licensee's primary hospital. Since Memorial Hospital is also the primary hospital for the D.C. Cook Nuclear Plant, adequate facilities for handling radioactively contaminated patients from this plant are available. Emergency planning personnel from both plants are jointly developing procedures and agreements regarding responsibilities for kit and equipment maintenance replacement. Kits and equipment located at the present secondary hospital (Mercy Hospital, Benton harbor, Michigan) will remain for overflow of patients from Memorial Hospital. The licensee will continue to be responsible for maintenance of emergency kits and related equipment at this hospital.

In response to an Open Item from the previous inspection on shift augmentation drills (Open Item No. 50-255/86015-01) the licensee has trained and qualified new personnel for the positions which were not adequately staffed in earlier drills. The telephone call list was updated, and another shift augmentation drill was conducted on October 27, 1986. Following notification procedures and using three security officers to execute the telephone calls, the drill was only partially successful. Plant management in coordination with the EPC has selected a telecomputer dialing system to improve the notification system. Also 11 personnel pagers have been issued to specific emergency response personnel. Delivery of both items is not expected until June 1987. Training and practice drills will follow later.

The Lead Inspector received a verbal commitment from licensee management representatives at the exit interview to conduct another shift augmentation drill before July 1, 1987, to be followed by a second drill within 90 days of the first drill. Both drills should adequately document response times for each responder. Satisfactory demonstration of shift augmentation capability should not be delayed while awaiting installation and operation of the proposed telecomputer dialing system plus the addition of 11 pager units for key emergency response personnel.

Based on the above findings, this portion of the licensee's program is acceptable, except for that portion concerning the adequacy of the shift augmentation drills.

d. Training

The inspectors reviewed the training matrix, emergency organization call-out list, and the training records of 33 members of the emergency response organization. The effectiveness of the training was evaluated through walk-throughs and interviews with three Shift Supervisors and two Duty Call Superintendents. All five indicated good knowledge of the EP concepts, including use of EALs, activation procedures, notifications, and proper use of the Protective Action Recommendations (PARs).

The review of computerized training documentation indicated the 33 persons who participate in onsite training were still current as far as requalification training was concerned. If individuals cannot attend classroom requalification training, a self-study program is sent them and a proctored exam is scheduled. Those individuals who do not complete emergency requalification training are reported to the Plant Manager and removed from the call-out procedure list.

Also reviewed was the EP related training for Security personnel, as modified following the last August 1986 exercise. Lesson plans were revised to widen the scope of EP as related to Plant Security's function during an emergency. This resulted mainly from a finding in the 1986 exercise that Plant Security could have been better coordinated in its efforts to integrate security/safeguards with the Operation Support Group and the SED in the TSC. The training records for 14 Plant Security personnel were reviewed by the inspector and found to be current. This training did include the revised lesson plans initiated since the August 1986 exercise. Also Procedure No. EI-4.1, Technical Support Center, has been revised to include the addition of a Plant Property Protection Supervisor to serve as a liaison between the SED and the Security Force.

Based on the above findings, this portion of the licensee's program is acceptable.

e. Independent Reviews/Audits

The annual independent review of the licensee's EP program consisted of an observance and evaluation of the August 19, 1986, exercise by an independent utility and also an evaluation by the licensee's Quality Assurance (QA) Department which was conducted on September 22-30, 1986. The inspector's review of documentation for both portions of the audit concluded that there was sufficient depth and objectivity to the review. Five findings resulted from the QA portion, but only two were related to EP. One involved lack of EP training for Property Protection and Security personnel. Follow-up on this item was verified by the inspector as previously identified in Section 4.d of this report. The other EP related finding identified the lack of sufficient first aid kits mounted on the walls in various locations of the plant and a few locations outside the main buildings. Thirteen locations were included in this total. To verify that action has been completed on this finding, the inspector selected 5 of the 13 locations to check. Accompanied by the Plant Safety Coordinator, these five locations were each found to contain a first aid kit and an accompanying burn kit. One inventory list, for the kit on the Turbine Floor location, was not current. The Plant Safety Coordinator assured the inspector that this inventory list would be updated without delay. Section 7.9.2 of the SEP requires these kits to be installed with accountability and inventory checks performed at least monthly.

The portion of the independent review concerning an evaluation for adequacy of interface with State and local governments (10 CFR 50.54t) has been made available to the State and local governments by the licensee. Allegan County, upon receiving this offer, did request a copy of that portion of the review. The inspector confirmed that the licensee fulfilled that request. Other aspects of the report included surveillance of practice emergency drills and a review of critiques following the drills and the exercise. Also addressed were improvement items, open items, and other comments from NRC inspection reports.

A revised administrative procedure, Annual Independent Review of Emergency Planning, has been issued as of April 13, 1987. This new format will apply for both Consumers Power Nuclear Plants. This procedure will be used on the next scheduled independent review. It appears more definitive and addresses key areas which were not always evaluated as part of this review in the past. Also the Lead Inspector was informed that future QA reviews of the EP program would not be combined with reviews of other plant areas. Thus the report would only address EP findings and concerns. This should also give greater exposure to the EP program as related to other areas.

Based on the above findings, this portion of the licensee's program is acceptable.

5. Exit Interview

The inspectors held an exit interview on April 24, 1987 with those licensee representatives denoted in Section 1 of this report. The inspectors determined from the licensee that none of the information discussed was proprietary in nature. The Lead Inspector discussed the scope and findings of this inspection. Of prime concern was the licensee's lack of successfully demonstrating the ability to call-in required additional staff as part of the shift augmentation program. Licensee management made a commitment to conduct another shift augmentation call-in drill before July 1, 1987 and another within three months of the first date. Specific detailed results of these drills including response times should also be documented. The licensee should avoid a lapse in this capability while awaiting the addition of the telecomputer dialing system and additional pagers which should be operational including training by approximately August 1987.