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September 24, 1979

Mr. Frank Pagano
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Pagano:

TRIP REPORT ON SITE VISIT TO BIG ROCK POINT - EMERGENCY PLANNING REVIEW

The Big Rock Point Nuclear Power Plant was visited by NRC Emergency Planning Review Team No. 6 during the week of September 17-20, 1979. The team members were William L. Axelson of NRC Region III, Alden T. Oyer of LASL and Jerome B. Martin of Battelle Northwest. The following report is a summary of the reviews, discussions, and meetings that were conducted, presented in chronological order.

Monday, September 17, 1979

The three team members met at about 8:00 am with Roger Sinderman, Corporate Health Physicist and Milton Jury, Emergency Planning Coordinator, both of Consumers Power Company, Jackson, Michigan. The discussion centered around the meetings and activities planned for the week. The Consumer Power representatives were somewhat concerned about the public meeting and the potential involvement of the news media and intervenors.

At about 9:00 am we all went to the plant site where we met Charles Axtell, Plant Health Physicist and Howard Fields, Plant Licensing Engineer. A brief meeting was held in the conference room where our plans for the week were explained again. Mr. Axtell then took the team members on a fairly comprehensive tour of the plant, including the control room, turbine building and the containment vessel. I spent most of my time on the tour inspecting radiation detection instrumentation and respective readouts in the control room. All of the fixed instrumentation was quite old; (circa 1960) but it all appeared to be in operating order with current calibrations. In later discussions, I learned that the plant was experiencing significant maintenance and part replacement problems with these instruments. A few modern portable radiation survey and monitoring instruments were also observed

1032 197

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Mr. Frank Pagano
September 24, 1979
Page 2

during the tour. The maximum radiation level that could be measured by the fixed area monitors in containment and elsewhere was 1000 mR/hr. These monitors were all sodium iodide detectors that were calibrated by exposure to a cobalt-60 source.

After the plant tour, we met again in the conference room to further refine plans for the review. We were supplied with copies of the Big Rock Point Site Emergency Plan, a draft of the revised nuclear facility incident response portion of the Michigan Disaster Plan, and the Charlevoix County Emergency Plan.

Since we had no previous opportunity to review these plans, we returned to our motel rooms to read the plans. This review also included a comparison to Regulatory Guide 1.101, 10 CFR 50 Appendix E and the Acceptance Criteria. We found the Plant Emergency Plan to conform reasonably well with the existing guidance of Regulatory Guide 1.101, except that the emergency notification responsibilities and the communication chain were not clearly specified. However, the duties and functions of staff members with emergency responsibilities were well defined. Emergency action levels and other quantitative guidance that would be necessary for correctly defining an emergency classification were less than adequate.

The draft of the revised nuclear facility incident response portion of the Michigan Disaster Plan contained at least three provisions that are significantly incompatible with the provisions of Regulatory Guide 1.101 and the Acceptance Criteria. The Michigan plan has an emergency classification system, designated A, B and C, that does not correspond to the Notification of an Unusual Event, Alert, Site Emergency, and General Emergency scheme proposed for Regulatory Guide 1.101. Apparently, Michigan's A, B, C system is formally specified in state law and a revision may be very difficult to accomplish.

The revised state plan also contains a provision that assigns responsibility to the Department of Public Health to evaluate and approve or disapprove the emergency plans of fixed nuclear facilities. Apparently, this provision is also formally specified in state law.

The Protective Action Guides (PAGs) specified in the draft revision do not correspond to the latest recommendations of EPA. The Michigan PAG's would require evacuation or other protective actions at radiation levels substantially lower than those recommended by EPA.

Other minor problems in the Michigan plans were also noted. These included minor technical errors, the definition of "immediate notifications", the inappropriate use of dose units (rem) rather than concentration units to specify protective actions for contaminated human and animal food, and the inappropriate use of "non detectable" to specify maximum allowable contamination limits.

1032 198

Mr. Frank Pagano
September 24, 1979
Page 3

The Charlevoix County Emergency Plan contained a large volume of obsolete information and plans related to nuclear attack. Little or no information in the plan pertained specifically to the Big Rock Point Nuclear Power Plant.

I also reviewed the Emergency Plan for Zimmer, NUREG-75/111, other pertinent Regulatory Guides, SECY-79-450, ANSI N320 (draft), excerpts from NUREG-0578, and the revised Acceptance Criteria.

Tuesday, September 18, 1979

The team members met at the Big Rock Point Plant conference room to continue the review of emergency plans. A detailed review of each item of the Acceptance Criteria was performed during the morning. During this period, the important elements of the plant, state and local emergency plans, as described above, were discussed and evaluated.

During the afternoon, the team members met with Milton Jury, Charles Axtell, and Howard Fields, all of Consumers Power Company. Each element of the Acceptance Criteria was discussed in detail to assure that the plant representatives understood the new requirements. During these discussions, the plant representatives suggested several potential responses to the requirements for onsite technical and operations support centers, offsite emergency operations center, communications systems, radiation detection instrumentation, coordination with state and local plans, etc. The team members provided preliminary evaluation and advice on these proposed responses within the limits of the discussion and very general specifications. Throughout the discussion, the plant representatives were very cooperative and receptive to the team's advice and recommendations. They also realized that the team would have to perform a much more intense technical evaluation of their revised plans that would be submitted by the end of the five week response period. The plant representatives expressed their appreciation for the guidance and assistance that the team provided. We also thanked them for their cooperation and hospitality.

Wednesday, September 19, 1979

The team met with the plant, state and local representatives in the Training Facility adjacent to the plant. Consumers Power Company was represented by Milton Jury, Charles Axtell, Howard Fields and Glen De Floe (spelling?). Charlevoix County was represented by Clyde Cunningham, Chairman of the County Commissioners, Mr. Brakey, County Commissioner and Chairman, Emergency Services Committee, Alice Tunison, Coordinator, Emergency Services, and Sheriff George Lassiter. The Michigan Department of Public Health was represented by Robert Moody, Health Physicist. The Michigan State Police were represented by Sargent James Tyler. The Petoskey News Review was represented by Jeff Blake, Reporter. The local emergency plans were

Mr. Frank Pagano
September 24, 1979
Page 4

discussed during the morning and the state plans were reviewed during the afternoon. The state representatives were present during the discussion of the local plans but only Alice Tunison, of the county representatives, was present during the discussion of the state plans.

The discussion of the Charlevoix County Emergency Plans centered around the mechanisms and logistics of an emergency notification from the plant and the appropriate response from county officials. After rather lengthy discussion, it was finally agreed that an emergency notification from the plant to the Sheriff would be authenticated then accepted as fact. The sheriff would then mobilize his staff as necessary and notify the county emergency officials. If an evacuation were recommended by the plant, the Sheriff would proceed with it as rapidly as possible. A variety of warning and notification systems were discussed. Relocation centers and emergency services for evacuees were also considered. Some revisions to the county emergency plan were suggested by the team. The county representatives were extremely cooperative and receptive to the advice and recommendations of the team and the plant representatives. Their major concern was a lack of human and financial resources that would enable them to revise their plan within the five week response period. The team leader encouraged the Consumers Power representatives to assist the county officials in this effort if possible. The county representatives were thanked for their active participation and cooperation.

The discussion of the Michigan Disaster Plan and the draft revision to the nuclear facility incident response section centered around the non-compatible provisions and technical problems described above. It should be noted that the representative of the State Department of Public Health adopted a rather beligerent, advisory position throughout the afternoon discussion. His position significantly diminished the progress toward implementation of the Three Mile Island (TMI) Lessons Learned that otherwise could have been accomplished. Despite his attitude, the team was able to suggest corrective actions for technical errors in the draft revised plan. The state plan made reference to the "Division of Radiological Health, Radiological Emergency Response Procedures" which are still being developed and were not available for review or discussion. These procedures will need to be reviewed in order to make a meaningful evaluation of the capabilities of the Department of Public Health to respond to a nuclear facility incident. It was interesting to note that, at the conclusion of the meeting, Mr. Moody explained that the position he presented was that of his management and did not represent his personal opinions.

Thursday, September 20, 1979

The team attended a "close out" meeting with representatives of the NRC and Consumers Power Company at the Visitors Center adjacent to the plant. The NRC was represented by James R. Miller, Frank Pagano, Richard Silver, and William Axelson. Consumers Power Company was represented by Cy Hartman,

1032 200

Plant Manager, Donald De Moor, Plant Engineer, James Rang, Operations and Maintenance Supervisor, Charles Axtell, Plant Health Physicist, and Howard Fields, Plant Licensing Engineer. Also present was Roger Boyd of KMC, consultant to Consumers Power Company. Bill Axelson opened the meeting by summarizing the review and discussions described above. Jim Miller and Frank Pagano provided background information relative to the mission of the Emergency Planning Task Force. Mr. Pagano also reviewed the status of Congressional action related to the work of the Task Force. Plant representatives asked a few questions about the schedule for submission of revised emergency plans and the installation of required emergency instrumentation. They also indicated they would request relief from some requirements, such as a containment area monitor capable of reading 10^6 R/hr or a 10 mile emergency planning zone radius, if they could show that the maximum hypothetical accident at Big Rock Point could not reach these limits. The NRC representatives agreed that such a request would be approved if adequately justified. The plant representatives were thanked for their cooperation and the meeting was adjourned.

A public meeting was held at the Charlevoix City Hall at 1:00 pm. All those who attended the "close out" meeting were in attendance except for Mr. De Moor. Others who could be identified were Alice Tunison, County Coordinator of Emergency Services and Jeff Blake, Petoskey News Review. Reporters from two television stations and another newspaper reporter were present but did not clearly identify themselves. Approximately 8 or 10 members of the general public were present. The meeting was opened by Mr. Miller who described the mission of the Emergency Planning Task Force. Mr. Pagano then presented background information relative to the Task Force and described the new requirements to upgrade emergency plans. Mr. Axelson summarized the work of the team during the previous 3-1/2 days. The meeting was then opened for public comments and questions.

Several questions were asked by local residents relative to emergency warning and evacuation plans. Answers were provided within the limits of current information. No comments were made that provided any substantive input to the team or to the plant, state, or local emergency planners.

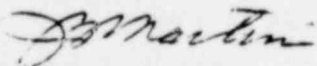
Several other questions were asked that dealt with various aspects of nuclear power plant safety other than emergency planning. The questioners were referred to the local Public Library Reading Room or were requested to address their questions to Samuel Chilk, Secretary for the Nuclear Regulatory Commissioners. These questioners were generally dissatisfied with this response. The public meeting was adjourned at about 2:15 pm and several members of the team and the NRC representatives departed for the airport.

It is recommended that future public meetings be scheduled such that an informal discussion period can follow the formal public meeting if necessary. It is my opinion that the public meeting held in Charlevoix was a disservice to the public and the credibility of the NRC was further damaged. The objective of holding public meetings should be to provide public information and to enhance the credibility of the NRC.

Mr. Frank Pagano
September 24, 1979
Page 6

The proceedings of the public meeting were tape recorded and can be transcribed if necessary. Other portions of this report can be expanded somewhat if further explanation or detail is needed.

Respectfully submitted,



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1032 202