



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
722 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

May 17, 1979

Mr. Terry J. Lodge, Chairman
Toledo Coalition for Safe Energy
P.O. Box 4545
Toledo, Ohio 43620

Dear Mr. Lodge:

This is in reply to your letter of April 24, 1979, identifying steps which you believe should be taken relative to resumption of operations of the Davis-Besse nuclear plant. As you probably know, based on information obtained to date from the Three Mile Island accident, the NRC issued an Order to all operating reactor licensees owning Babcock and Wilcox Company nuclear steam supply systems, including Davis-Besse, requiring certain design modifications and changes in operating procedures. A copy of the Order to Toledo Edison Company is provided as an enclosure. The reactor will not be permitted to return to operation until the actions specified in the Order have been completed to the satisfaction of the NRC.

With respect to the actions specified in your letter, we are treating your letter as a request for a formal Hearing in accordance with Part 2.206 of the NRC Rules and Regulations (Title 10 - Chapter 1 Code of Federal Regulations). As such, I have forwarded your letter to our Headquarters staff for consideration of your request. You can expect to hear directly from them regarding this matter.

If you have additional questions regarding the NRC's actions in this matter, please let me know.

Sincerely,

James G. Keppler
James G. Keppler
Director

Enclosure:
Order to Toledo Edison Company

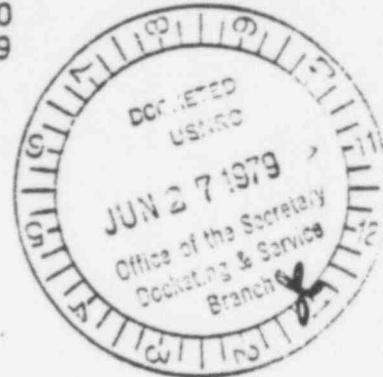
bcc w/o enclosure:
Dudley Thompson, X00S

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Toledo Coalition for Safe Energy
P.O. Box 4545
Toledo, OH 43620
(419) 243-6959
April 24, 1979



Mr. James G. Keppler, Director
Nuclear Regulatory Commission, Region III
Office of Inspection and Enforcement
799 Roosevelt Rd.
Glen Ellyn, IL 60137

Dear Mr. Keppler:

We have followed with considerable interest the actions of the NRC and Toledo Edison, operator of the Davis-Besse nuclear plant, since the Three Mile Island disaster. After reading your comments in the April 20, 1979 Toledo Blade concerning personnel performance at Davis-Besse, we are greatly concerned about the irresponsibility of the NRC decision to allow Davis-Besse to go back on line before numerous safety questions have been answered.

Our concerns have been redoubled by the April 19 findings of the Ohio Public Interest Research Group (OPIRG) that documents the gross inadequacies of emergency and evacuation plans in the event of a serious accident at Davis-Besse. The NRC appears to be an accomplice in a no-win situation, allowing a less-than-public spirited utility to return to power generation while that utility continues to maintain incompetent staff and substandard emergency preparations.

Therefore, the Toledo Coalition for Safe Energy demands that the following steps be taken by your office immediately:

1/ That Toledo Edison officials be restrained from reopening Davis-Besse until such time as all possible operational problems, human and mechanical, have been corrected;

2/ That revised and updated evacuation plans be posted in visible public places within a 50 mile radius of Davis-Besse within 30 days of your receipt of this notice, and prior to D-B's reopening;

3/ That a full-scale disaster drill be conducted within a 10 mile radius of the plant prior to its return to power generation;

4/ That all consumers in the Toledo Edison and Cleveland Electric Illuminating jurisdictions receive a complete written description of emergency procedures with their last electric bills prior to the startup of Davis-Besse;

5/ That these and other matters become the subject of full and open public hearings initiated by the NRC prior to D-B's startup.

Your earliest written response to these urgent requests will be

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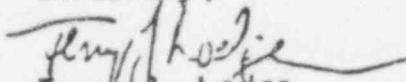
Mr. James G. Kepler

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greatly appreciated. Thank you.

Sincerely,



Terry D. Lodge

Chairman

TCSE Legal Action
Committee

cc: Members, U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Senator Howard Metzenbaum
234 Summit St.
Toledo, OH 43604

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Frequency Of Errors By Personnel At Davis-Besse Is Under NRC Study

Number Called Unusually High

By MICHAEL WOODS
Blade Science Editor

WASHINGTON — The U.S. Nuclear Regulatory Commission is trying to determine why the Davis-Besse Nuclear Power Station near Toledo continues to be plagued by an unusually high number of personnel errors.

James Keppler, director of NRC's Chicago regional office, said the frequency and potential seriousness of mistakes made by plant personnel have given Davis-Besse one of the poorest reputations for operator precision in the region.

The Chicago regional office oversees 21 nuclear power plants spread through a broad section of the Midwest.

Many of the personnel errors at Davis-Besse have been minor, Mr. Keppler said. But others have involved crucial safety systems, where mistakes carry the potential for the most serious kinds of nuclear reactor accidents.

Turned Off Wrong Valves

Mr. Keppler cited, as an illustration, one incident last month in which a plant

operator was supposed to turn off a specific valve at the facility. Instead of turning off the correct valve, he turned off two other valves — a mistake that partially inactivated the reactor's crucial emergency core cooling system.

The Toledo Edison Co., which has charge of operations at Davis-Besse, may be fined for the incident, Mr. Keppler said. Toledo Edison is co-owner of Davis-Besse, along with the Cleveland Electric Illuminating Co.

Davis-Besse has come under sharp NRC scrutiny in recent weeks in the aftermath of the accident at the Three Mile Island nuclear power plant near Harrisburg, Pa.

Davis-Besse's reactor is a sister to the reactor at Three Mile Island, both having been built by the nuclear engineering firm of Babcock & Wilcox. In addition, NRC has identified malfunctions similar to those at Three Mile Island that occurred in less serious form early in the operating life of Davis-Besse.

Shutdown Urged

The plant's continuing problem with personnel errors, which Mr. Keppler discussed during an interview Thursday, are an additional factor.

Mr. Keppler said that mistakes by per-

sonnel operating Davis-Besse became so worrisome that an NRC inspector recently urged Mr. Keppler to shut the plant down and keep it closed until the situation could be corrected.

Davis-Besse currently remains shut down, following a scheduled outage for maintenance. Mr. Keppler said he does not intend to order Edison to keep the plant shut — partly because of assurance from Toledo Edison President John Williamson that operation will not resume until the personnel problem is solved.

No Action To Prevent Restart

NRC has taken no action that would prevent Edison from restarting the plant immediately. Technically, all Edison would have to do is notify NRC of its plans to "go critical" with the plant.

Another factor, Mr. Keppler said, is that Edison personnel at the plant do seem capable of operating the facility in a "passable" fashion.

If he were to rate operator performance there on a "pass-fail" basis, Mr. Keppler said he would confer a passing grade.

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THE BLADE: TOLEDO, OHIO, FRIDAY, APRIL 20, 1979

Davis-Besse Personnel Errors Under Study

Continued from First Page

But he also indicated that on a scale of A, B, C, D, or F, he probably would grade plant personnel performance with a "D."

Transcripts of a closed NRC meeting held here April 5, a week after the Three Mile Island incident, mention Davis-Besse's continuing problems. John Davis, acting director of NRC's office of inspection and enforcement, noted during the meeting: "If we did have a rating system of A, B, C, we would put Davis-Besse C on this scale. It should be a better plant."

Mr. Keppler acknowledged that personnel errors do tend to be more frequent during the early months of operation at any new atomic power plant, when the staff is new and relatively inexperienced. And, indeed, personnel

Besse in the months following startup in August, 1977.

But personnel errors have remained unusually high at the plant and show no indication of dropping off after two years of operating experience.

Poor Motivation, Discipline

The reasons, Mr. Keppler said, are perplexing. Among the possibilities being considered by NRC are inadequate training of the operators, poor motivation, and poor discipline. Ironically plant personnel scored well on the federal licensing examination for reactor operators, Mr. Keppler noted.

Mr. Keppler said that Edison realizes that there have been problems with personnel at the plant and has agreed to submit a plan for correcting them.

Mr. Williamson said Thursday he has

Besse shut down until he is certain that operation can resume safely.

Performance of plant personnel has improved recently, Mr. Williamson said, noting that operators — some of whom are former navy personnel with reactor experience — have been trained well.

Assuring Complete Safety

Some of the plant operators will be trained shortly in new procedures stemming from the Three Mile Island incident. Training will be on a computer simulator at the Babcock & Wilcox nuclear facility in Lynchburg, Va.

The primary concern at this point is assuring complete safety of the plant and not the economic impact of the shutdown, he noted. Mr. Williamson said it probably will be a matter of weeks, rather than days or months, before the plant is set to resume operations.



OHIO PUBLIC INTEREST RESEARCH GROUP

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FOR IMMEDIATE RELEASE

Wednesday, April 18, 1979

Contact: Janis White
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614-299-8827

Kathy Westby
216-775-8137
216-775-5283



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EMERGENCY EVACUATION PLANS AT DAVIS-BESSE PLANT INADEQUATE

Plans to safely evacuate the residents of the area near the Davis-Besse nuclear power plant in case of a nuclear accident appear to be inadequate, according to the Ohio Public Interest Research Group (OPIRG). The group has called for a full scale evacuation drill before the plant reopens.

"We have discovered that neither the utility nor the state emergency plans meet all the recommended federal guidelines and that the two plans differ in many aspects which could affect the smooth functioning of an actual evacuation," said Kathy Westby, research coordinator. 836 334

"Government and utility personnel charged with responsibilities in the plans do not always know what those responsibilities are," Westby said.

Developing and implementing emergency evacuation procedures are the joint responsibility of the Toledo Edison Co., the operator of the Davis-Besse plant, and the Ohio Disaster Services Agency. The utility plan, filed with the Nuclear Regulatory Commission, covers emergency procedures within the plant and plans for off-site support by government agencies. The state's draft plan, incomplete although the plant has been in operation, establishes the roles and responsibil-

ities of government personnel in the event of an emergency.

According to Westby, the only employee of the Ottawa County Disaster Services Agency was not aware that he is supposed to play a major role in evacuating residents and arranging for their relocation. Instead, he believed his role was a minor one, simply to act as a liaison between the plant and state officials to provide needed support after the accident.

One fire official said, "We don't have any of that wicked stuff [dangerous radiation] here [at the plant]." He told OPIRG researchers he had formed this opinion based on information he had received from Davis-Besse officials.

The utility company is required to contract with two hospitals for the provision of emergency medical services. The principle hospital identified in the utility plan is the Magruder Memorial Hospital, in Port Clinton, approximately eleven miles from the plant. They are only equipped to handle up to 80 serious radiological victims.

The second hospital named in the plan is the University of Pennsylvania Hospital in Philadelphia. An administrator at Magruder however, thought the second hospital was probably St. Charles Hospital in Toledo and was totally unaware of the role of the University of Pennsylvania Hospital.

"Given the fact that the primary hospital is within the possible radiation zone, and that the other one is almost 400 miles away with no apparent plans for transporting victims, makes us question the adequacy of medical provisions in the plan," said Westby.

Current plans would evacuate residents within a 2 mile radius of the plant, although there has been some recent discussion of extending that to a 20 mile radius.

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"A full scale nuclear accident could affect an area the size of Pennsylvania. What good would these plans do us then?" said Janis White, Director of OPIRG.

"Even if a less serious accident occurred, it could become necessary to

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evacuate the Toledo area which is only 35 miles from the plant," she added.

The state draft plan equates nuclear evacuation procedures with those used in the event of a natural disaster such as floods or high water.

"Nuclear accidents and natural disasters are not equivalent and cannot be handled in the same way. Differences in warning times and signals, as well as the health hazards connected with radiation exposure require special consideration for a nuclear emergency. By comparing the two, the state is demonstrating its lack of awareness of the real dangers of a nuclear disaster," White said.

"Neither plan meets all the recommended federal guidelines," Westby added. "For instance, estimates of expected accident assessment times, evacuation times, or traffic capacities of evacuation routes are not mentioned at all in the plans."

"OPIRG questions the effectiveness of these plans. Our research indicates that they are ambiguous, contradictory, incomplete, and untested," said Westby.

"A few of the agencies listed in the plans have held their own practice drills, but no coordinated, full scale drills have been conducted based on the plans," continued White. "The public has never been told how they will be contacted or what they should do in case of a nuclear emergency."

"In the states where nuclear evacuation drills have been conducted, evacuation plans have had to be rewritten to reflect reality," she added.

"We call on Toledo Edison and the state of Ohio to schedule a full scale evacuation drill before the Davis-Besse plant is put back in operation," said White. "They have accepted the public responsibility to protect Ohioans - we have the right to see if the plans on paper will work in practice."

OPIRG is a statewide, university based research and advocacy organization concerned with consumer protection, environmental quality, human rights, government responsiveness, and corporate responsibility.

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State and Utility Evacuation Plans:

Are They Inadequate?

Utility companies and the state share the responsibility for developing and implementing emergency evacuation plans in the event of a nuclear accident. The Nuclear Regulatory Commission requires the utility company to file a plan dealing with both in-plant and off-site procedures. The state plan delineates the roles and responsibilities of off-site agencies involved in evacuation procedures.

Evacuation plans for the Davis-Besse nuclear power plant have been developed by the Toledo Edison Co. and the Ohio Disaster Services Agency (draft plan).

OPIRG has analyzed whether the Toledo Edison plan and the State of Ohio plan meet federal standards. Officials named in the two plans were also contacted by letter and/or phone to find out what they believe they are supposed to do in case of a nuclear emergency.

Failure To Meet Federal Guidelines

Both plans fail to meet some of the recommended federal guidelines.

The utility plan does not contain:

- the expected accident assessment time
- the expected time required to notify the population
- estimates of evacuation times for the areas which would be affected
- estimates of the traffic capacities of egress routes
- arrangements with contiguous states

The state draft plan does not contain:

- planning coordination with nearby states
- a population chart by sectors around the plant
- an account of institutions and transient populations which may impair mobility
- egress routes and their traffic capacities
- plans for yearly drills and exercises

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Ambiguities and Contradictions

The following chart compares what the plans state should happen with what the officials interviewed believe they would do:

THE PLANS SAY:

1. SHIFT FOREMAN

Utility Plan: evaluates accident, notifies off-site support groups in case of emergency, contacts other plant officials, county sheriff, medical assistance and fire department if needed.

State Plan: does not specify who from

THE OFFICIALS SAY:

would contact Toledo Edison - company would then contact sheriff.

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plant notifies off-site support groups.

II. COUNTY SHERIFF

Utility Plan: contacts Ohio and Ottawa County Disaster Services Agencies; initiates emergency notification system, sets up road blocks and other evacuation procedures.

State Plan: notifies all county and state agencies involved, notifies residents in affected area, designates road blocks.

would contact relevant agencies and help evacuate people.

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III. OTTAWA COUNTY ENGINEER

Utility Plan: assist in traffic control and back-up communications.

State Plan: provide barriers, make equipment and manpower available, support evacuation, assist in door to door notification.

would help evacuate, notify public, set up road blocks, assess equipment and get more help if needed.

IV. OHIO DISASTER SERVICES AGENCY

Utility Plan: work with sheriff to determine evacuation routes and relocation centers, arrange for food, lodging, and medical care.

State Plan: not mentioned in text.

have prepared draft state plan - doesn't deal with evacuation routes, does have list of potential care centers for Ottawa county.

V. OTTAWA COUNTY DISASTER SERVICES AGENCY

Utility Plan: not mentioned in text.

State Plan: evacuate residents, identify and prepare evacuation centers, arrange for 10 days support, coordinate emergency planning with other county agencies.

consists of one employee who believes his role is after the disaster, would contact Ohio Disaster Services Agency for help, said he would play minor role.

VI. FIRE DEPARTMENT

Utility Plan: contacted if needed.

State Plan: assist sheriff with public notification, assist in evacuation procedures and fight any fires.

would help put out plant fires (however do not have any special equipment at Department for fighting radiological fires), would help with public notification.

VII. MEDICAL SUPPORT

A. AMBULANCE SERVICE

Utility Plan: provided by Robinson Funeral Home, Oak Harbor.

State Plan: not mentioned in text.

no longer provided by Robinson Funeral Home - sold to Carroll Township Emergency Medical Service - unable to find supervisor there.

B. MAGRUDER MEMORIAL HOSPITAL, Port Clinton

Utility Plan: radiation emergency area ready if needed, have special

could handle up to 80 serious cases of radiation exposure, informal agree-

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equipment.
State Plan: not mentioned in text.

ments with other area hospitals
to handle overflow.

C. UNIVERSITY OF PENNSYLVANIA HOSPITAL,
Utility Plan: second facility named
to handle radiation exposure cases.
State Plan: not mentioned in text.

Philadelphia
not contacted (Magruder Hospital ad-
ministrator not aware that University
of Pennsylvania Hospital is the
back-up hospital).

D. RADIATION MANAGEMENT CORPORATION
Utility Plan: provide training and
and evaluation of emergency
medical plans.
State Plan: not mentioned in text.

did not respond to OPIRG letter.

VIII. TOLEDO EDISON CO.
Utility Plan: release public infor-
mation.
State Plan: not mentioned in text.

Public Relations staff person knew
little about plan or procedures.

Some other agencies are listed in the plans as playing secondary roles, but
were not contacted by OPIRG.



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