



21 February 1978  
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CS-78-52

Mr. J. P. O'Reilly, Director  
Office of Inspection & Enforcement  
U.S. Nuclear Regulatory Commission  
230 Peachtree St. N.W., Suite 818  
Atlanta, GA 30303

Docket No. 50-302  
License No. DPR-72  
REF: RII-GTG  
50-302/77-24

Dear Mr. O'Reilly:

We offer the following responses to the apparent items of noncompliance in the referenced Inspection Report. As noted in your report, corrective steps were taken for items B, C, and F during the Inspector's visit. Therefore, the response to these items will include the corrective steps to be taken to avoid further noncompliances only.

Before discussing the specific items contained in the Notice of Violation, we would like to address significant action which will be taken to enhance the management control systems governing the Emergency Plan. The Emergency Plan contained in the FSAR is an historical document describing the Emergency Plan as it existed at the time of licensing. Since that time, numerous changes in personnel and implementing procedures have been effected. Because the Emergency Plan has not been part of the Plant Operating Quality Assurance Manual (POQAM), it has received less attention than warranted. The current Emergency Plan will be incorporated in POQAM via review by the Plant Review Committee and approval of the Nuclear Plant Manager, to assure attention and action by appropriate plant management. This incorporation will be completed by 1 June 1978.

- A. Emergency Plan Section 3.1.1 states the Emergency Coordinator shall call appropriate individuals or agencies listed in the Emergency Roster. Section 4.5.4.c of the Emergency Plan specifies action to be initiated when an unplanned release exceeds  $1.2 \times 10^{-7}$   $\mu\text{Ci/cc}$ .

Contrary to the above:

1. Emergency Procedure EM-206, "Emergency Plan Roster and Notification" did not have current Emergency Roster Call List telephone numbers on December 5, 1977.
2. Emergency Procedure EM-203, "Classification of Emergencies and Criteria for Evacuation," did not implement

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Section 4.5.4.c of the Emergency Plan.

A-1 Response: As noted in Details I.5.b.(2), the next annual review of the Emergency Plan is due in March 1978. This review would have provided necessary input to correctly update telephone numbers within the required time frame. This annual review was considered an acceptable interval by a previous inspector. At the time of Inspection 77-24, an update of Emergency Procedure EM-206 was in progress to reflect additions and changes to Fire Brigade and Offsite Support Group membership.

Corrective steps which were taken include review and update of EM-206 with insertion of appropriate personnel and current phone numbers.

Corrective Action to prevent further noncompliance has been taken by issuance of a directive from the plant manager to Section Heads, informing them of their responsibility to notify the Plant Manager's Secretary of any changes within their sections which affect personnel or phone numbers listed in EM-206. The Secretary will then issue the housekeeping change within one week of such notification.

The annual review will be continued to assure compliance.

Full compliance has been achieved as of this date.

A-2 Response: We believe that this item does not constitute a noncompliance, but rather points up an inconsistency between Section 12B of the FSAR and Technical Specifications. In addition to this inconsistency, the wording of Section 4.5.4.c of the Emergency Plan is obviously in error as, in discussing release rate, the value given is in concentration ( $\mu\text{Ci}/\text{cc}$ ). Guidance given us in the past by the NRC indicates that where conflicts exist, the Tech Spec must take precedence. Emergency Procedure EM-203, and other appropriate Emergency Procedures, do reference, and are consistent with appropriate Sections of Tech Specs. In light of our plans to incorporate the Emergency Plan in POQAM, and our Administrative Control of procedures therein, assurance is given that appropriate safety analyses will be made of implementing procedures.

- B. Emergency Plan Sections 1.0.4.6.2.7.c, 6.1 and 6.3 specify equipment and applicable materials to be available at the Emergency Assembly Center (EAC), Fossil Plant Control Room, and Fossil Plant Water Laboratory.

Contrary to the above, on December 6, 1977, the following required equipment and applicable materials was not available:

1. Emergency Assembly Center (EAC)
  - a) Copy of Emergency Plan.
  - b) Base Radio Station for communication on channel 1, with oil barge tugboats.

- c) Portal monitor.
  - d) Decontamination kit.
  - e) Emergency Environmental Survey Team Vehicle during backshift operation.
  - f) Monitoring kit 1 - High Range Instrument.
2. Fossil Plant Control Room - Copy of Emergency Plan.
  3. Fossil Plant Water Laboratory - Copy of applicable Emergency Procedures.

B. Response: The incorporation of the Emergency Plan into the Plant Operating Quality Assurance Manual with review and audits should preclude recurrence.

C. Section 3.2.8 of the Emergency Plan specifies that the Crystal River Fire Brigades shall be self-reliant, requiring no offsite support, Emergency Procedure EM-216, "Duties of the Nuclear Plant Fire Brigade", Section 3.4 states that each Fire Brigade should consist of persons who have received specified training. Section 1.2 states the Nuclear Plant Fire Brigade will implement actions to effectively handle the fire emergency.

Contrary to the above, on December 5-8, 1977, backshift staffings of the Fire Brigade were composed of two shifts where only one Fire Brigade member was present onsite.

C. Response: Technical Specifications incorporating the fire protection functions within the plant have been issued and will be in force 5 March 1978. Additional members of the plant staff are currently being trained for qualification as fire brigade members. This training of sufficient numbers of personnel will assure that required fire brigade manning levels are met prior to the imposition of applicable Tech Specs.

D. Section 2.2.3 of the Emergency Plan requires an Environmental Survey Team and a Radiation Survey Team. Section 7.2 of the Emergency Plan states that, through training, the personnel shall maintain a high proficiency in radiation protection including emergency monitoring.

Contrary to the above, on December 14, 1977, only one technician was present onsite during backshift on weekends, to staff the Environmental Survey Team and Radiation Survey Team, and periodically this technician position was staffed with an individual whom had not completed training in Emergency Procedures EM-208 and EM-210.

D. Response: Since the time of the inspection, all Chem/Rad technicians have been trained as required. At least two of these technicians are present during backshifts, one of whom is the responder for Radiation Survey Team action. The Environmental Survey Team is not intended to be onsite at all

times, but members of this team are subject to fast re-call should their action be required. These actions have not only resolved the item, but also, they preclude recurrence. Full compliance has been achieved.

- E. Emergency Plan Sections 7.3.b and 7.3.c.1 require quarterly medical drills and semi-annual Class A and B drills.

Contrary to the above, the licensee has not performed these drills since issuance of the operating license.

- E. Response: The quarterly medical drills and semi-annual Class A & B Emergency drills will be conducted prior to the end of the First Quarter 1978 and as required thereafter. The Training Coordinator will factor these exercises into his training cycle to preclude recurrence. This action will be completed prior to 1 April 1978.

- F. Technical Specification 6.8.1.a requires written procedures to be implemented for the procedures recommended in Appendix A of Regulatory Guide 1.33. Appendix A, of Regulatory Guide 1.33, Section J, specifies radiochemical laboratory instrumentation calibration procedures shall be established. Crystal River Surveillance Procedure SP-707, Section 6.2, requires weekly resolution determinations of the GeLi gamma spectroscopy system

Contrary to the above, resolution determinations of the GeLi gamma spectroscopy system was not performed during the weeks of October 31 and November 15, 1977.

- F. Response: As noted by the inspector during his visit, previous and subsequent resolution determinations demonstrated the adequacy of the system during the time periods in question.

Corrective steps to avoid further noncompliance were taken on 9 December 1978 with the issuance of Follow-up Report #77-360, which detailed the deficiency and pointed up the necessity for strict adherence to procedures and schedules. This Follow-up Report was read and understood by all appropriate individuals in the Chem/Rad Section and initialled by them.

Further, an effort is currently underway to consolidate the scheduling of Chem/Rad surveillances, calibrations, and other routine activities. This should assist in the prevention of lapses by providing better continuity. This consolidation should be complete by 1 May 1978.

If there are further questions, please contact us.

Very truly yours,

*W. P. Stewart*

W. P. Stewart  
Director, Power Production

DWP/rc

*SPB*  
Nuclear Plant Manager