#### UNITED STATES NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

#### REGION III

Report of Emergency Planning Inspection

IE Inspection Report No. 050-346/76-22

Licensee: Toledo Edison Company

Edison Plaza

300 Madison Avenue Toledo, Ohio 43652

Davis-Besse Nuclear Power Station

License No. CPPR-80

Category: B Unit 1

Oak Harbor, Ohio

Type of Licensee: PWR (BW) 2772 MWt

Type of Inspection: Routine - Announced

Dates of Inspection: October 28 and 29, November 16-19, 1976

Principal Inspector: A. G. Januska

(Date)

Accompanying Inspector: W. B. Grant

Other Accompanying Personnel:

Reviewed By: J. A. Pagliaro, Chief

Environmental and Special

Projects Section

8002030179

#### SUMMARY OF FINDINGS

## Inspection Summary

Emergency planning inspection on October 28 and 29, November 16-19 (76-22): Examination of Davis-Besse Nuclear Power Station Emergency Plan (Revision 1, August 12, 1976) and Implementing Procedures; discussions with offsite support agency representatives and plant personnel; review of agreements and coordination with offsite agencies, facilities and equipment, means for monitoring releases of radioactivity, medical arrangements, training, implementing procedures, and the observation of a radiation emergency medical drill.

#### Enforcement Items

None.

# Licensee Action on Previously Identified Enforcement Items

No previously identified enforcement items within the scope of this inspection.

#### Other Significant Items

A. Systems and Components

A drill, conducted on October 29, 1976, revealed a deficiency in the station public address system. The licensee agreed to test the entire system prior to fuel loading. (Paragraphs 3.c and 10, Report Details)

B. Facility Items (Plans and Procedures)

All of the implementing procedures contained in the Emergency Plan and Implementing Procedures Manual were reviewed, discussed with the licensee representative, and comments submitted to the licensee. (Paragraph 9, Report Details)

C. Managerial Items

None.

D. Deviations

None.

E. Status of Previously Reported Unresolved Items
None.

## Management Interview

The following items were discussed on November 19 with Messrs. W. Green, D. Briden and B. Geddes:

- A. The scope of the inspection. (Paragraph 2, Report Details)
- B. Review of the emergency plan. (Paragraphs 4 through 9, Report Details)
- C. Observation of a drill. (Paragraph 10, Report Details)
- D. Open items to be completed prior to fuel loading. (Paragraphs 3.a through e, Report Details)

#### REPORT DETAILS

### 1. Persons Contacted

#### Davis-Besse Personnel

- J. Evans, Station Superintendent
- W. Green, Station Technical Assistant
- D. Briden, Chemist and Health Physicist
- J. Hickey, Training Supervisor
- B. Geddes, Radiochemistry and Health Physics Specialist

#### Offsite Agencies

- F. Mettler, M.D., Radiation Management Corporation
- J. Williams, State of Ohio Emergency Preparedness Officer
- D. Henn, Robinson Funeral Home, Oak Harbor, Ohio
- E. Adkins, Director of Nursing, Magruder Hospital, Port Clinton, Ohio

#### 2. General

This inspection consisted of a review of the Emergency Plan (Revision 1, August 12, 1976), and the Implementing Procedures related to the plan. Items inspected included: coordination with offsite agencies, facilities and equipment, means for monitoring releases of radioactivity, medical arrangements, training, implementing procedures and the observation of the response by the licensee's organization during a scheduled drill.

### 3. Open Items

The following open items, identified during this inspection, require completion prior to fuel loading;

## a. Letters of Agreement

Appendix C of the Emergency Plan (Administrative Procedure AD 1827.00.1) contains a list and copies of letters of agreement with offsite support groups. The list should reflect copies available or document the reason why copies were not obtained.

### b. Facilities and Equipment

Procedures for inspection of emergency supplies, to include schedules and records of inventory and calibration, were not available. Periodic Testing Procedures which list all, but not limited to the following, should be developed; 1) Toledo Edison Company first aid kits, 2) first aid facility, supplies and equipment, 3) first aid bag, 4) Radiation Access Control Area emergency locker, 5) Emergency Control Center lockers, 6) supplied breathing air units, 7) resuscitator, 8) meteorological instrumentation, 9) effluent monitors, 10) portable monitoring equipment designated as emergency equipment, 11) hospital supplies, 12) communication equipment not covered in the security plan.

Applicable testing procedures should be implemented when equipment is put in place or instrumentation made operable, in order to assure that emergency related equipment complies with the inventory list contained as Appendices to these procedures.

#### c. Public Address System

The observation of a scheduled drill conducted on October 29, 1976, revealed a deficiency in the station's public address system. In order to assure that personnel are made aware of emergency conditions, the station public address system should be tested while the plant equipment is running to simulate operational noise in order to determine the adequacy of the quantity and quality of the system coverage.

# d. Up to Date Emergency Plan Manual

The Emergency Plan and Implementing Procedures Manual is the mechanism by which emergency conditions are categorized and handled, and therefore important that certain critical copies are kept up to date immediately upon issuance of a change or temporary modification request. A management control should be developed to assure that the control room, shift supervisor, station superintendent and emergency control center copies are current at all times.

### e. Training

All station personnel, contractor personnel and consultant support groups stationed on the site must receive general orientation training which includes the bases of industrial safety, radiation safety, the site emergency plan, quality assurance and site security prior to fuel loading. A memo documenting the completion of general orientation training to these three groups should be issued. This memo should also detail the method by which new station personnel, contractor personnel and consultant support groups and transient personnel shall receive their general orientation training.

## 4. Coordination with Offsite Agencies

The licensee has current letters of agreement for all but one agency listed in Appendix C of his Emergency Plan. The remaining letter of agreement is addressed in Paragraph 3.a of the Report Details. Contact with select offsite agencies and the observation of a scheduled drill conducted on October 29, 1976, verifies coordination between the licensee and offsite agencies.

### 5. Facilities and Equipment

Emergency equipment, facilities and systems were discussed with a licensee representative. The stocking of various emergency kits and the Emergency Control Center has not been completed to date, nor has the emergency communication system been inspected. The licensee representative has agreed to equip and inventory emergency kits, the Emergency Control Center and other emergency systems as described in Paragraph 3.b of the Report Details.

### 6. Means for Monitoring Releases of Radioactivity

Effluent monitors were not operational at this time and they, along with survey team instrumentation and meteorological equipment, will be examined after a Periodic Testing Procedure is developed and implemented. The licensee has developed, as part of one of his implementing procedures, release rates (Q Data Sheet for Iodine 131 and Noble Gases), offsite dose calculation data sheets, conversion charts and diffusion overlays for the seven Pasquill stability classes. In addition the licensee has provided large maps of the area located in the emergency control center, shift supervisor's office and the Chemistry and Health Physics area for use with the diffusion overlays.

### 7. Medical Arrangements

The licensee has a medicall; supplied onsite first aid facility near the entrance to the Radiation Access Control Area and has listed in Administrative Memorandum No. 38, dated August 19, 1976, 72 men who have current Red Cross Multi-Media Cards and

are qualified to be First Aid Tea bers. The licensee has made arrangements for an ambulance service, qualified physicians and an offsite medical treatment facility as described in Section 3.2 of his Emergency Plan.

### 8. Training

The inspector discussed the licensee's training program with the Training Supervisor. General orientation training will be given to all station personnel, contractor personnel and onsite consultant support groups prior to the operation of the plant. The licensee maintains training records on an individual basis and on a course basis. The completion of the training will be documented in accordance with Paragraph 3.e of the Report Details.

#### 9. Implementing Procedures

Twenty-two Administrative Procedures, Emergency Procedures and Health Physics Procedures were reviewed and comments discussed and submitted to a licensee representative. These procedures constitute the Emergency Plan Implementing Procedures. The changes submitted will be reviewed when select procedures have been revised.

#### 10. Tests and Drills

The inspectors viewed the video tape of an annual radiation emergency medical exercise conducted by Radiation Management Corporation in December of 1975 and discussed tests and crills with the Training Supervisor. The licensee representative stated that in addition to the requirement of the annual radiation emergency medical exercise, a series of mini drills will be conducted by site personnel.

A scheduled radiation emergency medical exercise was observed on October 29, 1976. This drill was conducted in accordance with a preplanned scenario which involved two station individuals having fallen in the solid waste packaging room. One victim had a sprained ankle and the second victim was found unconscious, both in an area placarded to read 10 R/hr and both with simulated contamination on the exposed parts of their body and clothing to levels of 3 mrem at two inches. One inspector observed the drill portion which took place in the solid waste packaging room and another inspector observed that portion of the drill that took place at Magruder Memorial Hospital. Critiques

of the drill were held at the hospital and at the site. No deficiencies were noted at the hospital. The site critique revealed a deficiency in the public address system. The inspector discussed the importance of testing the entire public address system prior to fuel loading with the station under operational conditions; that is with equipment running. This is addressed in Paragraph 3.c of the Report Details and will be reviewed during a subsequent inspection.