#### DRAFT INPUT FOR SAFETY EVALUATION REPORT DAVIS BESSE NUCLEAR POWER STATION, UNIT 1 DOCKET NO. 50-346

# 13.0 Conduct of Operations

# 13.1 Organization and Oualifications

The Toledo Edison Company is responsible for the design, construction, and operation of the Davis Besse Nuclear Power Station, Unit 1. The Station Superintendent has the direct responsibility for the operation and maintenance of the station in a safe, reliable, and efficient manner. He reports through the Vice President - Facilities Development to the Senior Vice President - Operations during construction of the Station. When the Station begins commercial operation, the Station Superintendent reports through the Vice President - Energy Supply to the Senior Vice President - Operations.

The plant staff for the station consists of approximately 97 full-time employees, including 30 operating personnel. The staff is organized in five sections, plus the clerical staff. The supervisors of these sections, all reporting to the Station Superintendent, are the Operations Engineer, Technical Engineer, Chemist/Health Physicist, Maintenance Engineer and Inspection Engineer. The Instrument & Control group report to the Termical Engineer. The guard force reports to the Office Supervisor, who reports directly to the Station Superintendent.

The Operations Engineer has the responsibility for directing the day-to-day operation of the station. Reporting to him are

the Shift Foreman and the Training Coordinator. The normal operating shift for Unit 1 consists of a Shift Foreman, who will hold a senior reactor operator license; one Supervising Operator and one Reactor Operator, each of whom will hold reactor operator licenses; and two Equipment Operators. The applicant states that the educational and experience backgrounds for all candidates for positions on the station staff were carefully evaluated and training programs were initiated where required. The applicant has also stated that the minimum qualifications for the station personnel meet or exceed the requirements of ARSI N18.17-1971, "Selection and Training of Nuclear Power Plant Personnel," March 8, 1971.

The applicant has established a technical support staff for the operation of the station. The staff is composed of members of the Power Engineering Department and the Transmission and Substations Engineering Department. Individual resumes are included in the FSAR. In addition, a Quality Assurance Department has been established to administer the quality assurance program during the design, construction, and operation of the station. Other operating divisions and departments are available to the station staff for consultation and technical assistance as required. Consultants have been retained by the applicant for technical assistance in the design, construction, and operation of the station. They include NUS Corporation for general assistance in the nuclear and siting areas including radwaste treatment and

environmental monitoring, Woodward Morehouse and Associates for geotechnical services, The Research Corporation of New England for meteorological services, Great Lakes Research Institute of the University of Michigan for limnology studies of Lake Erie, Center for Lake Erie Research of the Ohio State University for Lake Erie studies, Pickard Lowe and Associates for technical services relating to nuclear fuel, General Physics Corporation for services in the area of station operating personnel selection and training, and Radiation Management Corporation for the emergency medical program.

We conclude that the organizational structure and the qualifications of the staff for Davis Besse Unit 1 are sufficient to provide acceptable staff and technical support for the operation of the station.

#### 13.3 EMERGENCY PLANNING

Pursuant to the requirements of 10 CFR 50.34(b)(6)(v) of the Commission's regulations, the applicant has included plans for coping with emergencies. These plans are addressed in the FSAR at Section 13.3 and in Appendix 13-D in a document entitled, "Davis Besse Nuclear Power Station Emergency Plan." We have reviewed this Emergency Plan, resubmitted in its entirety with Amendment 32 of 10/31/75, and revised by Amendments 33 of 3/1/76 and 35 of 5/12/76.

The Emergency Plan outlines the actions and responsibilities of Davis Besse personnel and offsite support groups in the event of an emergency. The Plan has been developed (1) to etablish an emergency organization to direct the response to any emergency condition or radiological incident and to limit the consequences of the incident, (2) to control onsite and offsite surveillance activities to assess the extent and significance of any uncontrolled release of radioactive or toxic materials, (3) to establish procedures to identify and evaluate a spectrum of accidents and their effect on members of the public and station personnel, and (4) to delineate protective action levels and protective measures and actions required to protect members of the public and station personnel in the event of an incident.

The Station Superintendent, with the Operations Engineer as an alternate, is responsible for overall supervision of emergency operations. The normal operating crew headed by the on-duty shift Foreman, will perform the actions necessary to institute immediate protective measures and to

implement the Emergency Plan. An Emergency Control Center (ECC) will be activated in the event of a site or offsite emergency, and will be staffed by qualified members of the station staff. A designated Emergency Duty Officer will be in charge of the ECC. Communications will be established with the operating crew and with offsite support groups. Radiation Monitoring Teams will perform onsite and offsite surveys under the direction of the Emergency Duty Officer. In addition to backup technical support supplied by Toledo Edison Company, arrangements have been made with several offsite support groups for specialized assistance, including a mutual assistance agreement with the Detroit Edison Company in Ohio and the Consumers Power Company in Michigan.

The Plan divides emergencies into three classifications; Local, Site, and Offsite. For each classification, the plan describes the in-plant situation at which emergency action would be initiated. Criteria have been established for the notification and participation of local, State and Federal agencies. Agreements in writing have been made with the following agencies:

U. S. Nuclear Regulatory Commission, Argonne, Illinois.
U. S. Environmental Protection Agency, Chicago, Illinois
U. S. Department of Commerce, National Weather Service, Silver Spring, Md.
Ohio Department of Agriculture, Reynoldsburg, Ohio
Radiation Management Corporation, Philadelphia, Pennsylvania
Magruder Memorial Hospital, Port Clinton, Ohio
Robinson Funeral Home, Oak Harbor, Ohio
Ottawa County District Board of Health, Port Clinton, Ohio
Ottawa County Sheriff, Port Clinton, Ohio
Oak Harbor Fire Department, Oak Harbor, Ohio

The agreement with the Ottawa County Sheriff's Department provides assurance that prompt emergency action will be initiated in the environs of the plant upon notification by the Plant Superintendent or the Emergency Duty Officer that protective measures for the public may be necessary.

The Plan provides for an annual review of the Emergency Plan. The Station Review Board will perform this function and will recommend the updating of the implementing procedures as necessary. Training in emergency procedures and monitoring duties is provided for all station operations, technical and maintenance personnel. Additional training will be given to those individuals assigned to the position of Emergency Duty Officer. Annual drills will be scheduled to exercise each member of the plant staff's immediate action responsibilities, and to disclose any deficiencies. During the drills, telephone and radio communications will be checked with the Ottawa County Sheriff's Department. The State agencies involved in emergency planning will be invited to participate in or send observers to each drill. Special drills will be conducted with the Oak Harbor Fire Department and the Magruder Hospital.

A first aid station is located onsite and provides for personnel monitoring, decontamination, and emergency medical treatment. Appropriate equipment, survey instruments and medical supplies are available at the station. The services of a company physician is available, as required. Arrangements

have been made with the H. B. Magruder Memorial Hospital and the Hospital of the University of Pennsylvania for the treatment of contaminated and injured personnel. Transportation will be provided by the Robinson Funeral Home Ambulance Service.

The Company Nuclear Review Board is designated as the technical group responsible for evaluating re-entry advisability depending on existing conditions. Evacuated employees will be interviewed and operating records will be made available for review. Exposure levels have been preselected for lifesaying, protection of the public and the protection of property.

We have reviewed the information submitted by the applicant, including the Davis Besse Emergency Plan, Section 13.3 of the FSAR, and responses to questions by the NRC staff. We conclude that the applicant's emergency planning program meets the requirements of 10 CFR 50 Appendix E, and provides a basis for an acceptable state of emergency preparedness.

# 13.6 Review and Audit

The applicant has established a two-level review and audit program.

The Station Review Board, appointed by the Station Superintendent, will meet at least monthly to review station operation and safety considerations, procedures, tests, Technical Specifications, and station design and changes thereto. The Board will review abnormal occurrences and Technical Specification violations to determine the cause and make recommendations to prevent recurrence. It will recommend the approval or disapproval of review items to the Superintendent. Minutes of meetings will be sent to the Vice President - Energy Supply, the Vice President - Facilities Development, and the chairman of the Company Nuclear Review Board.

The Company Nuclear Review Board, CNRB, constituted in writing in the Station Quality Assurance Manual, will be composed of senior members of the applicant's organization and staff specialists. One half of the Board members will have extensive nuclear experience and all shall be engineering or science graduates. Special consultants will be utilized as necessary to provide additional expertise advise. This Board will meet quarterly during the period of initial operation, and no less frequently than semi-annually thereafter. It will review evaluations of proposed changes to procedures, equipment, or systems; proposed tests and experiments and their results; proposed changes to the Technical Specifications; violations, deficiencies or deviations in operations; abnormal occurrences; and the station audit program. Minutes will be recorded of all meetings.

The applicant states that the specific details related to review and audit will be consistant with the requirements of ANSI N18.7,

Section 4.0. The major features of the program will be included in the administrative controls section of the technical specifications. We have concluded that the review and audit program established by the applicant is acceptable.