



SMUD

SACRAMENTO MUNICIPAL UTILITY DISTRICT □ 6201 S Street, P.O. Box 15830, Sacramento CA 95852-1830, (916) 452-3211
AN ELECTRIC SYSTEM SERVING THE HEART OF CALIFORNIA

D/AGM 89-080

November 21, 1989

U. S. Nuclear Regulatory Commission
Director, Office of Enforcement
Washington, DC 20555

Docket No. 50-312
Rancho Seco Nuclear Generating Station
License No. DPR-54
RESPONSE TO NOTICE OF VIOLATION EA 89-180

Attention: James Lieberman

By letter dated October 25, 1989, the Sacramento Municipal Utility District received a Notice of Violation concerning activities at the Rancho Seco Nuclear Generating Station. In accordance with 10 CFR 2.201, the District provides the enclosed response to this violation and also encloses check number 236535 to pay for the civil penalty imposed.

This letter acknowledges the violations cited and describes the District's corrective actions. In addition to the corrective actions taken to avoid further violations in Emergency Preparedness, I have emphasized to the responsible manager and the entire management team the importance I place on managers following their procedures and maintaining compliance with license requirements. Also, on a random and as requested basis, Nuclear Quality and Industrial Safety will conduct special surveillances to verify compliance with procedures and license requirements. The District remains committed to the protection of public health and safety and will continue to comply with license requirements until such time as specific relief is granted by the NRC.

Members of your staff with questions requiring additional information or clarification may contact Mr. Bob Jones at (209) 333-2935, extension 4675.

Sincerely,

J. R. Shetler
Deputy Assistant General Manager
Nuclear

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PDR ADOCK 05000312
Q PNU

Handwritten notes:
IF 14 w/che. h. 236535
11 # \$ 50,000

State of California

SS

County of Sacramento

J. R. Shetler, being first duly sworn, deposes and says: that he is Deputy Assistant General Manager, Nuclear of Sacramento Municipal Utility District (SMUD), the licensee herein; that he has executed the foregoing document; that the statements made in this document are true and correct to the best of his knowledge, information, and belief, and that he is authorized to execute this document on behalf of said licensee.

J. R. Shetler
J. R. Shetler
Deputy Assistant General Manager
Nuclear

Subscribed and affirmed to before me on this 21st day of November, 1989.



Elizabeth L. Gandy
Elizabeth L. Gandy
Notary Public

Enclosure

cc w/encl: J. B. Martin, NRC, Walnut Creek
A. D'Angelo, NRC, Rancho Seco
INPO

DISTRICT RESPONSE TO NOTICE OF VIOLATION EA 89-180

NRC STATEMENT OF VIOLATION

- A. 10 CFR 50.54(q) requires the licensee to follow and maintain in effect emergency plans which meet the requirements in 10 CFR Part 50, Appendix E. Appendix E, Section IV.F (Training) requires the training of employees by periodic drills.

Section 8.3.5.a of the licensee's Emergency Plan requires that a semiannual health physics drill be conducted. Section 1.9.7 of the licensee's Technical Specifications defines semiannual as "A time period spaced to occur at least once per six (6) months."

Contrary to the above requirements, as of September 1, 1989, a semiannual health physics drill had not been conducted by the licensee since October 3, 1988.

- B. Technical Specification 6.8.1.e requires that written procedures be established, implemented and maintained covering Emergency Plan implementation.

1. Section 8.2.2 of the licensee's Emergency Plan addresses the Emergency Response Training Program. EPIP-5600, "Training", Revision 2, dated March 27, 1989, has been developed to implement this portion of the Emergency Plan. Section 5.2.10.1 of EPIP-5600 requires that "personnel receive initial training before being placed in the active Emergency Response Organization (ERO)." Attachment 7.1 of EPIP-5600 identifies the initial training requirements for all positions in the ERO.

NRC STATEMENT OF VIOLATION (Continued)

Contrary to the above requirements, fourteen (14) individuals were placed in the Emergency Response Telephone Directory (ERTD) as members of the ERO essential staffing roster, but had not received all of the required initial training required by Attachment 7.1 for the assigned positions. Eleven (11) of the individuals were placed in the ERTD on April 1, 1989, and the three (3) remaining individuals were placed in the ERTD on July 1, 1989.

2. Section 8.2.2 of the licensee's Emergency Plan addresses the Emergency Response Training Program. EPIP-5600, "Training", Revision 2, dated March 27, 1989, has been developed to implement this portion of the Emergency Plan. Section 5.2.10.2 of EPIP-5600 requires that "personnel who are delinquent in their retraining are removed from the active ERO." Attachment 7.1 of EPIP-5600 identifies the retraining requirements for all positions in the ERO. Attachment 7.2 of EPIP-5600 identifies the frequency of the required retraining.

Contrary to the above requirements, as of September 1, 1989, twenty-nine (29) of the seventy-seven (77) individuals listed on the ERO essential staffing roster had neither completed retraining in accordance with EPIP-5600, nor been removed from the active ERO (ERTD).

These violations are classified in the aggregate as a Severity Level III problem (Supplement VIII).

Cumulative Civil Penalty - \$50,000 (assessed equally among the three violations)

DISTRICT RESPONSE TO NOTICE OF VIOLATION EA 89-180

DISTRICT RESPONSE

Violation A

1A. Admission or denial of the alleged violation:

The District acknowledges that the above occurred.

2A. Reason for the violation:

The Semiannual Health Physics Drill (required to be completed prior to the end of June 1989) was intended to be included as part of another drill which was scheduled to be conducted on June 15, 1989. After the election on June 6, 1989, the Environmental Monitoring and Emergency Preparedness (EM&EP) Manager consulted with the AGM, Technical Services, who in turn consulted with the CEO, Nuclear, to discuss postponing the drill. Based on those discussions, the EM&EP Manager was directed to postpone the drill. This was communicated to the Emergency Preparedness (EP) Supervisor, the Drill Coordinator, and ERO members.

The EP Supervisor directed the Drill Coordinator to review the drill schedule to ensure that regulatory-required drills were rescheduled. Neither the Drill Coordinator, the EP Supervisor, nor the EM&EP Manager realized that postponing the drill past the end of June would result in not meeting the requirement to complete the semiannual health physics drill.

DISTRICT RESPONSE

Violation A (Continued)

3A. Corrective actions taken and results achieved:

- The Health Physics Drill was conducted on September 27, 1989.
- In preparation for the Annual Exercise, a full scale Dress Rehearsal was conducted on November 14, 1989. The graded annual Exercise is scheduled for December 6, 1989.
- Entering the refueling mode was suspended until after the successful completion of the Health Physics Drill.
- Licensing initiated a Potential Deviation from Quality (PDQ) regarding the failure to conduct the Health Physics Drill. (Reference PDQ 89-641)

4A. Corrective actions to avoid further violations:

- Emergency Preparedness Implementing Procedure EPIP-5610 "Drills and Exercises" and the Drill and Exercise Manual will be revised to identify all regulatory-required drills and their required frequency. Revision of the drill schedule will require the review and signature of the EP Supervisor and EM&EP Manager.

5A. Date when full compliance will be achieved:

- The revised procedure and Drill and Exercise Manual will be completed by December 31, 1989.

DISTRICT RESPONSE TO NOTICE OF VIOLATION EA 89-180

DISTRICT RESPONSE (continued)

Violation B

1B. Admission or denial of the alleged violation:

The District acknowledges that the above occurred.

2B. Reason for the violation:

Violations B.1 and B.2 are closely related with regards to cause and corrective actions and are discussed together in the District's response to these violations.

In early 1989, the EP Training Coordinator began researching the 1987 and 1988 EP training records and realized that some individuals listed in the EP Training Database as not qualified were listed in the ERO Database as being qualified.

The EP Training Coordinator thought that this was primarily a documentation problem because many training records had not yet been entered into the EP Training Database; he did not believe that it was a lack of actual training. The EP Training Coordinator discussed the problem with the EP Supervisor although the magnitude of the problem was still unknown.

DISTRICT RESPONSE

Violation B (Continued)

The discrepancy between the two databases was discovered at a time when the Emergency Response Telephone Directory (ERTD) was being prepared for its quarterly issue (second quarter 1989). Several organizational changes had occurred at Rancho Seco resulting in many new people being added to the ERO. The EP Training Coordinator and the ERO Staffing Coordinator realized that some of the new ERO members had not completed their initial training requirements. Additionally, some existing ERO members had been identified as being delinquent in their retraining or their retraining was not adequately documented.

The EP Training Coordinator, the EP Staffing Coordinator, the EP Supervisor, and the EM&EP Manager met to discuss the discrepancy between the two databases and the issuance of the ERTD. Based on this discussion, they decided to include the old and new ERO members in the ERTD. The intent was to designate as not yet qualified those individuals who had not completed their initial training and those individuals whose retraining had not been completed or had not been properly documented. If these individuals were not included in the ERTD, some ERO positions would have no one listed in the ERTD.

When the ERTD was issued, there was no designation indicating who was qualified and who was not. In addition, there was no PDQ written regarding the discrepancy between the two databases or that some ERO positions had no one that was fully qualified.

The EP Training Coordinator continued to investigate the problems with the 1988 retraining documentation but was unable to locate attendance sheets for several training classes. Because substantial initial training for new ERO members was required and 1989 requalification training was coming due, the EP Training Coordinator and the EP Supervisor decided that it would be more effective to focus on training the current ERO rather than expending their limited resources on a document search to verify previous training. The EP Training Coordinator developed a schedule to have all training completed by November 30, 1989.

DISTRICT RESPONSE

Violation B (Continued)

From May 11, 1989, through May 25, 1989, Quality Assurance conducted an audit of the Emergency Preparedness Program pursuant to 10 CFR 50.54(t). Although the auditors judged the overall EP Program to be adequate, they did identify two findings and twelve observations. One relevant finding was that in six of nine ERO positions examined, the auditors were unable to verify documentation of the participant's qualifications. Interviews conducted by the auditors indicated that ERO members were qualified to respond to a radiological incident and that the deficiency was primarily due to poor documentation of training.

Although the EM&EP Manager, the EP Supervisor, and the EP Training Coordinator realized that there was a problem with ERO training records, they believed they had an adequate plan and were on course to resolving the problem. They realized that having individuals without adequate training documentation in certain ERO positions violated certain procedural requirements; however, they did not realize that it violated the requirements of Technical Specification 5.8.1.e.

3B. Corrective actions taken and results achieved:

- EP conducted training to staff the nineteen "essential positions" with fully qualified individuals to the two-deep level. This training was completed by September 8, 1989.
- Training to staff those essential positions with fully qualified individuals to the three-deep level was completed by September 15, 1989.
- Training for 95% of the entire ERO was completed by October 11, 1989.

DISTRICT RESPONSE

Violation B (Continued)

- EP issued an Action Plan to delineate corrective actions to be taken in response to the EP violations.
- The AGM, Nuclear issued a memorandum to ERO members emphasizing the need to attend all required EP training and drills.
- District management initiated an independent investigation to determine why the ERO maintenance and training programs were allowed to continue in violation of District procedures without adequate documentation of the noncompliance and prompt corrective action. The investigation resulted in several corrective action recommendations.
- The Manager, Nuclear Quality and Safety issued a STOP WORK ORDER to prevent the movement of any fuel until a fully qualified ERO was in place.
- The Manager, Nuclear Quality and Safety issued a STOP WORK ORDER on any further destaffing.
- The District initiated four PDQs regarding the potential violations identified during the NRC inspection. (Reference PDQs 89-641, 89-642, 89-643, and 89-644)

4B. Corrective actions to avoid further violations:

- The AGM, Nuclear convened a special meeting of his managers to determine if they had any information regarding noncompliance with license requirements. The meeting resulted in increased management awareness and emphasis on compliance with the license and regulations to assure continued protection of public health and safety.

DISTRICT RESPONSE

Violation B (Continued)

- The EM&EP Manager and other members of management were counseled on the importance of maintaining a fully staffed and qualified ERO.
- The District will continue to retain sufficient staff to ensure that an acceptable ERO is maintained with fully qualified individuals.
- The AGM, Nuclear issued a site-wide memorandum to emphasize the need to document potential deviations from quality so that potential problems can be identified and prompt corrective actions taken.
- Quality Assurance increased the number of surveillances to ensure continued compliance with E² regulatory and procedural requirements. Two surveillances were conducted immediately after the potential violations were identified. A third surveillance was conducted in November and a fourth surveillance is scheduled for December.
- EP is developing a formalized process for the control and use of the ERO training and staffing databases.

5B. Date when full compliance will be achieved:

A procedure formalizing the control and use of the ERO training and staffing databases will be completed by January 15, 1990.