

- a. Section 8.1.1 (d) of the Emergency Plan requires annual requalification training for the Plant Director and alternates.

This training is described in the Plan as an annual review conducted by Safety and Security Operations Personnel. Records of the 1989 Emergency Cadre annual training conducted September 5, 1989, were examined and it appears that two alternates for the Plant Emergency Director position did not attend the annual training regarding emergency response resources and the capabilities of the Plant Emergency Response Team (PERT).

- b. Section 8.1.1(e) requires PERT training in the use of portable fire extinguishers to be scheduled annually. Section 21.2 of the implementing procedures requires training in emergency fire fighting techniques. Section 21.1 of the implementing procedures states, "Failure to attend training shall result in the removal of an employee from the Plant Emergency Response Team unless a waiver is approved by the Supervisor, Radiological and Industrial Safety." Records of fire extinguishment training for 1987 indicated only 21 of the 41 members of the PERT attended Fire Training. Records of fire extinguishment training conducted November 1988 indicated only 9 of 44 members attended. Further, there were no documented waivers excusing some individuals from required training. Training in fire extinguishment is currently scheduled for November 1989. Failure to conduct fire training as required in the Emergency Plan was identified as a violation of License Condition 9 (70-1257/89-03-05) which requires the implementation of the Radiological Contingency Plan.
- c. Section 8.1.1(g) requires PERT members to receive annual advance first aid training, which includes a mass casualty simulation held in conjunction with the Richland Fire Department. Records of the PERT session covering advanced first aid/mass casualties training indicated that 27 of the 45 members of the PERT attended the training held in June 1989. Records of 1988 first aid/mass casualties training indicated 33 of 41 members of the PERT attended in 1988. Self contained breathing apparatus (SCBA) training is required by the implementing procedures for members of the PERT however, no specific frequency is stated in the Emergency Plan or the implementing procedures. Records of SCBA, Radiation Emergency, and Radiation Emergency Response Procedure training were examined and 28 of 44 individuals attended SCBA training in 1989 and 36 of 44 individuals attended radiation training.

The above observations indicate an apparent lack of lower management support of PERT training. A May 2, 1988, letter from Plant Management stated, "it is mandatory for all members of the PERT to attend PERT training sessions, which are held periodically throughout the year." The letter also stated that individuals would be deactivated until they receive training. However, the directive apparently was not effective based on the training records observed.

The inspection also included a review of the training session of the Emergency Plan and related implementing procedures. Based on this