

U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

REGION III

Reports No. 50-373/81-37; 50-374/81-18

Docket Nos. 50-373; 50-374

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: LaSalle County Station, Units 1 and 2

Inspection At: LaSalle Site, Seneca, IL

Inspection Conducted: October 13-15, 1981

Inspectors: *C. J. Paperiello*
M. P. Phillips

10/27/81

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10/27/81

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10/27/81

Inspection Summary:

Inspection on October 13-15, 1981 (Reports No. 50-373/81-37; 50-374/81-18)

Areas Inspected: Announced, pre-licensing followup inspection of the state of onsite emergency preparedness at the LaSalle County Nuclear Station involving items previously identified during the Emergency Preparedness Implementation Appraisal. The inspection involved 44 inspector-hours onsite by two NRC inspectors.

Results: No items of noncompliance or deviations were identified.

DETAILS

1. Persons Contacted

- *R. Bishop, Assistant Superintendent for Administration
- *G. Diederich, Assistant Superintendent for Operations
 - C. Schroeder, Technical Staff Supervisor
- *F. Lawless, Rad/Chem Supervisor
- *R. Kyronoc, Lead Quality Assurance Inspector
 - L. Bryant, Health Physicist
 - J. Lewis, GSEP Coordinator
 - C. Maney, Training Staff
 - P. Knoll, Chemistry Laboratory Supervisor
 - L. Aldrich, Health Physicist
 - G. Watts, Licensing Branch Staff

*Denotes those present at the exit interview.

2. Licensee Action on Previously Identified Items Related to Emergency Preparedness

a. Significant Appraisal Findings

(Closed) 373/81-14-01; 374/81-09-01: Prioritize onsite staffing augmentation procedures. LZP-1320-1, Augmentation of Plant Staffing, has been formatted to prioritize personnel notifications based on the travel time to the site. This procedure is reviewed quarterly, and revised as necessary to ensure that individuals who could report to the site in the shortest period of time are notified first. This should provide for partial manning of the Technical Support Center (TSC) within 30 minutes. The licensee will test this system within one year of fuel load as per their commitment described in the August 6, 1981, letter from Mr. L. O. DelGeorge to Mr. J. G. Keppler.

(Closed) 373/81-14-02; 374/81-09-02: Procedure LZP-1110-1 must be clarified. The Station Director's procedure (LZP-1110-1) was revised to require evacuation of non-essential personnel for any Site Area or General Emergency, to prioritize sample collection direction of Rad/Chem Technicians (RCTs), to include completion of the Nuclear Accident Reporting System (NARS) form prior to notification of the System Load Dispatcher, and to clarify what actions relative to offsite protective actions cannot be delegated.

(Closed) 373/81-14-03; 374/81-09-03: LGA-03 does not monitor containment radiation levels. LGA-03 does not require monitoring of the containment radiation level, but does require monitoring of parameters that affect containment integrity. LGA-T2 is a table used to record and monitor various emergency parameters, one of which is containment radiation level. If containment venting is necessary during an emergency, it is accomplished using LOA-VP-03,

which requires monitoring of containment radiation levels, offgas release rates, and offsite dose assessment results.

(Closed) 373/81-14-04; 374/81-09-04: Interface of LOA procedures with the emergency plan. All abnormal occurrence procedures (LOAs and LGAs) were reviewed and found acceptable with regards to interface with the emergency plan. LOA-ZZ-01, Operation During Earthquake Conditions, had been deleted from the LOA series of procedures. The licensee felt that emergency actions required if an earthquake occurred were described in other LOA and seismic alarm procedures relating to equipment functions.

(Closed) 373/81-14-05; 374/81-09-05: Fire preplans do not interface with GSEP. The licensee has stamped all fire preplans in red ink with the following: THIS MAY BE A GSEP CONDITION REFER TO GSEP PLAN FOR PROPER CLASSIFICATION. Based on the fire, proper classification should be made by the Shift Supervising Engineer referring to the fire preplans.

(Closed) 373/81-14-06; 374/81-09-06: Lack of equipment at the Operations Support Center (OSC). The inspectors examined the emergency equipment lockers and determined that emergency lighting equipment had been installed. The lockers contained a portable air sampler, high range personnel dosimeters, high range portable gamma monitor with teletector probe, as well as other emergency equipment and protective clothing.

(Closed) 373/81-14-07; 374/81-09-07: Emergency lighting and portable radiation monitoring in the assembly area. The inspectors determined that emergency lighting, Cutie Pie portable radiation survey instrument, and a portable scaler for monitoring contamination levels were all located in the assembly area.

(Open) 373/81-14-11; 374/81-09-11: Procedures needed for field team's use. The licensee has drafted fourteen additional Environs Group (EG) procedures; however, these procedures are not yet in final form. These procedures should be issued by the end of October. The inspectors determined that these procedures, if issued in their present form, will adequately address the means for documenting results, what information must be communicated to the EOF, and what equipment is needed. However, these procedures do not address which instruments are to be used in various circumstances, such as the instrument and means to determine whether or not the team is inside a plume or under the plume. This must be determined to assure that air samples collected from the plume are correctly taken.

(Closed) 373/81-14-12; 374/81-09-12: LZP-1220-4 must be corrected. This procedure has been revised to require the collection of liquid effluent samples from the drain line of the alarming process radiation monitor by the Rad/Chem Technician (RCT). In addition, a separate procedure (LZP-1330-8) has been prepared by the licensee

describing the means to collect this sample including appropriate precautions and limitations.

(Closed) 373-81/14-13; 374/81-09-13: The Rad/Chem Director's procedure (LZP-1180-1) does not specify sampling priorities. This procedure has been revised to prioritize sampling activities based on the potential for a release, e.g., none, imminent, occurring, verify stopped. This prioritization is also duplicated in the Station Director's procedure (LZP-1110-1).

(Closed) 373-81-14-14; 374/81-09-14: Procedure LZP-1360-1 must be revised. The licensee has revised this procedure so that it requires an RCT to report to the assembly area to monitor dose rates. This procedure also defines who will be in charge of the assembly area if a site assembly is ordered.

(Closed) 373/81-14-15; 374/81-09-15: Procedures for radiation protection during an emergency must be developed. The licensee has prepared procedure LZP-1360-4, Radiation Protection Practices During Accident Conditions, which supplements the routine Radiation Protection Procedures (LRPs) used. In addition, LRP-1250-2, Exposure Control, has been revised to ensure that exposure updates are performed daily during an emergency to prevent a repeat exposure to any emergency worker who has exceeded 10 CFR 20.101 limits. These procedures, in conjunction with the routine LRP procedures, prioritize what health physics functions will be performed by available RCT personnel, such as surveying, exposure control, dosimetry, sampling, and analysis.

(Open) 373/81-14-16; 374/81-09-16: Procedures for in-plant radiation surveys during an accident must be developed. LZP-1330-50, Radiation Surveys Under Accident Conditions, has been drafted and addressed the specific equipment to be used, how results will be recorded, and how results will be communicated to the Rad/Chem Director. This procedure did not address techniques for determining the source of the radiation levels detected, e.g., gamma only versus beta and gamma; nor did it address precautions regarding Kr-88 decay to Rb-88 (gas to particulate). These items should also be addressed in the appropriate referenced LRP (LRP-1360-6).

(Open) 373/81-14-17; 374/81-09-17: A training program for RCTs specifying their role during an emergency must be developed. The licensee has developed an excellent training program which covers the following seven areas: (1) tasks to be performed during the first 60 minutes of an accident on the backshift, (2) post-accident sampling and analysis for the first three hours of an emergency, (3) inplant radiation surveys during an accident, (4) use and interpretation of all portable and fixed area radiation monitoring equipment, (5) interpretation of critical effluent monitoring data, (6) first-aid and bioassay techniques, and (7) use of respirators during an emergency. The program consists of classroom and hands-on training, with both a written and

practical examination. This item remains open pending completion of the training program (classroom phase scheduled to be complete by October 27, 1981) and walk-throughs of RCTs to verify an adequate level of understanding.

(Open) 373/81-14-18; 374/81-09-18: Formal training program for all Acting Station Directors must be developed. The licensee has developed a training program for all Acting Station Directors, and was in the process of conducting this training during the course of this inspection. An oral exam is used to verify adequate proficiency. This item remains open pending completion of the training program and walk-throughs of the Acting Station Directors to verify an adequate level of understanding.

(Open) 373/81-14-19; 374/81-09-19: Scope and depth of existing GSEP Training Program must be re-evaluated. The licensee was still in the process of evaluating the program. If additional training is required it will then be conducted.

(Open) (373/81-14-8, 9, 10): Meteorological equipment and procedures needs upgrading. Those items are currently being evaluated by NRC/HQ and will be addressed at a later date.

b. Appraisal Improvement Items

With the exception of the items identified below, the inspectors determined that actions taken by the licensee to correct the items listed in Appendix B of our June 11, 1981, letter are acceptable; and these items are considered closed. The following items have been adequately addressed by the licensee and found to be acceptable:

3. Conduct an off-hours shift augmentation drill. The licensee committed to do this within one year of fuel load.
16. Expand Environs Group (EG) procedures. The licensee has drafted fourteen new EG procedures, which should be issued to procedure manual holders during November 1981.
19. Tab all critical LZPs and LOAs for quick access. The tabs have arrived onsite, and this action will be completed during November 1981.
20. Station Group Directors should be familiar with counterpart EOF Directors' procedures. This is being implemented in conjunction with Significant Findings Item 373/81-14-18 and 373/81-14-19.
25. Directional arrow signs to direct personnel to the emergency assembly area have been received, and will be installed after the Security Plan is fully implemented.

26. Revise Letters of Agreement to use St. Joseph's Hospital as backup. The licensee stated that St. Mary's Hospital in Streator is capable of handling multiple contaminated injuries, and therefore the use of NW Memorial Hospital in Chicago as the backup hospital is acceptable.
27. Additional training of St. Mary's Hospital personnel in radiation monitoring will be provided by Radiation Management Corporation during December 1981.
28. Because the Grand Ridge Fire Department is the tertiary responder and would not use station emergency procedures, they will not be given a copy of the LZP-1340 series of procedures nor a copy of the GSEP. The letter of Agreement between this agency and the licensee does specify what actions will be taken by the Fire Department.

As of this inspection, the licensee had not finished their consideration of Appendix B, items 18, 36 and 37; nor had they described what actions would be taken to complete items 23 and 24. These five items were not available for review by the inspectors.

Appendix B, items 1 and 2 were judged by the licensee to be unnecessary. These items addressed the effectiveness of training being audited by the Quality Assurance Department, and having only one duty-call person. With regard to the latter, we will examine whether the licensee's shift augmentation capability can meet the design objectives of Criterion II.B.5 in NUREG-0654, Rev. 1, with only one duty-call person when the licensee conducts the off-shift augmentation drill described in item 3 above. Although the licensee does not feel that the Quality Assurance Department is responsible for determining the effectiveness of the training program, the independent audit requirements of 10 CFR 50.54(t) require an annual review that includes an evaluation for adequacy of the licensee's drills, exercises, capabilities, and procedures. This adequacy determination must also be made to be in compliance with the regulations, and as such will be reviewed during subsequent inspections.

c. Open Items

With the exception of the two items identified below, none of the Open Items have yet been completed. These items are awaiting equipment installation.

(Closed) 373/81-14-21; 374/81-09-21: The completion of the TSC, including all required assessment parameters, is being tracked by Open Item number 373/81-00-99. For the purposes of tracking item 21 is closed.

(Closed) 373/81-14-29; 374/81-09-21: Implementation of Security Plan for emergencies. This item addresses the licensee's procedures for assembly and accountability. Since an assembly drill will be required prior to fuel load (373/80-53-03), this item is considered closed, and will be reviewed as part of the required assembly drill.

3. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on October 15, 1981. The inspectors summarized the scope and findings of the inspection and apprised the licensee of the status of items identified during the course of the Emergency Preparedness Implementation Appraisal conducted during the period April 20-May 1, 1981.