11-29-81

NOV 1 9 1981

Docket No. 50-286

Power Authority of the State of New York
Indian Point 3 Nuclear Power Plant
ATTN: Mr. J. C. Brons
Resident Manager
P. O. Box 215
Buchanan, New York 10511

Gentlemen:

Subject: Emergency Preparedness Appraisal 50-286/81-05

To verify that licensees have attained an adequate state of onsite emergency preparedness, the Office of Inspection and Enforcement is conducting special appraisals at each power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives of the appraisal at each facility are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened. We will use the findings from these appraisals as a basis not only for requesting individual licensee action to correct deficiencies and effect improvements, but also for effecting improvements in NRC requirements and guidance.

During the period of May 11-15, 1981, the NRC conducted an appraisal of the emergency preparedness program for Indian Point - Unit 3. Areas examined during this appraisal are described in the enclosed report (50-286/81-05). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices and interviewed personnel.

The findings of this emergency preparedness appraisal indicate that certain corrective actions are required in your emergency preparedness program. These are discussed in Appendix A, "Significant Emergency Preparedness Findings", and in summary include the following:

1) Provide a formalized documented training program.

2) Provide sufficient space in the Emergency Operations Facility.

3) Provide additional emergency procedures and improve completeness or clarity in others.

RI:EPS	RI:EPS	RI:EP&PSB	RI:EP&OS	RI:PB#1	RI:DD	RI:DIR
Wojnas/mjd	Bores	Snyder	G. Smith	Brunner	Allan	Hayne
11/12/81	11/ /81	11/ /81	11/12/81	11/13/81	11/ /81	11/ /81

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Based on telephone discussions betweer you and Messrs. Gary L. Snyder and Robert J. Bores of this office on November 10 and 12, 1981, we understand that you have completed the required improvements for items 1.a, 1.c, 4 and 7 of Appendix A of this letter. With regard to item 10, we understand that these improvements will be completed by November 30, 1981. For items 1.b, 3, 5, 6, 8 and 9, we understand that your improvement actions will be completed by January 15, 1982. With regard to item 2, we understand that the new EOF will be operational by December 1, 1981, and that the new Alternate EOF will be operational by December 21, 1981. Please confirm that the actions specified for items 1.a, 1.c, 4 and 7 have been completed. Additionally, if our understanding of your proposed actions for these items is not correct, please inform this office within 5 days of receipt of this letter. You are also requested to inform this office in writing when the aforementioned actions for items 1.b, 2, 3, 5, 6, 8, 9 and 10 have been completed.

The findings of this appraisal also indicate that there are areas for improvement in your emergency preparedness program. These are discussed in Appendix B, "Emergency Preparedness Improvement Items".

In conjunction with the aforementioned appraisal, emergency plans for your facility were reviewed by the Emergency Preparedness Licensing Branch. The results of this review indicate that certain deficiencies exist in your emergency plan. These are discussed in Appendix C, "Emergency Preparedness Evaluation Report".

Appendices A, B and C of this letter contain an inclusive listing of all outstanding emergency preparedness items at your facility at this time.

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendices A, B, and C may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) days of the date of this letter, describing your planned actions for improving each of the items identified in Appendix A and the results of your consideration of each of the items in Appendix B. This description is to include, (1) steps which have been taken, (2) steps which will be taken, and (3) a schedule for completion of actions for each item. With regard to Appendix C, you are requested to provide to this office within 120 days of the date of this letter, page changes to the emergency plan correcting each deficiency or provide written justification as to why you believe a revision should not be made. Copies of these changes are to be submitted in accordance with the procedures delineated in Section 50.54(q), Part 50, Title 10, Code of Federal Regulatons.

This is to inform you that if the deficiencies listed in Appendix A are not corrected by the dates agreed upon, the Nuclear Regulatory Commission will determine whether enforcement action is appropriate.

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In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractors) believe to be exempt from disclosure under 10 CFR 9.5(a)(4), it is necessary that you (a) notify this office by telephone within ten (10) days from the date of this letter of your intention to file a request for withholding; and (b) submit within 30 days from the date of this letter a written application to this office to withhold such information. Section 2.790(b)(1) requires that any such application must be accompanied by an affidavit executed by the owner of the information which identifies the document or part sought to be withheld, and which contains a full statement of the reasons on the basis which it is claimed that the information should be withheld from public disclosure. This section further requires the statement to address with specificity the considerations listed in 10 CFR 2.790(b)(4). The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified periods noted above, the report will be placed in the Public Document Room. The telephone notification of your intent to request withholding should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

The reporting requirements contained in this letter affect fewer than ten persons and therefore are not subject to Office of Management and Budget clearance as required by P.L. 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you. Should you have any questions concerning the items of Appendix C, please contact Mr. R. Priebe, Emergency Preparedness Licensing Branch at (301) 492-9695.

Sincerely,

Original Signed By:
Ronald C. Haynes
Director

Enclosures:
1. Appendix A, Significant Emergency Preparedness Findings
2. Appendix B, Emergency Preparedness Improvement Items
3. Appendix C, Emergency Preparedness Evaluation Report
4. Office of Inspection and Enforcement Inspection Report Number 50-286/81-05

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cc w/encls:
George T. Berry, President and Chief Operating Officer
J. P. Bayne, Senior Vice President-Nuclear Generation
C. M. Pratt, Assistant General Counsel
A. Klausmann, Vice President, Quality Assurance
D. Halama, Quality Assurance Superintendent
J. F. Davis, Chairman, Safety Review Committee
K. Burke, Director, Regulatory Affairs (Con Ed)
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Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York

bcc w/encls:
Region I Docket Room (with concurrences)
Chief, Operational Support Section (w/o encls)

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APPENDIX A

SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS

Based on the results of the NRC's appraisal of the Indian Point 3 Emergency Preparedness Program conducted May 11-15, 1981, the following improvements are required: (References are to Sections in Office of Inspection and Enforcement Inspection Report No. 50-286/81-05)

1. Development and implementation of an emergency response training program for qualifying individuals and groups who are selected for assignment to each of the various functional areas of activity, including: (See Section 3.1)

   a. medical first-aid, onsite and offsite fire response organizations, post-accident sampling, the recovery organization, other augmentation personnel, and the news media;

   b. provisions for training affected individuals in major plan, procedur , facility, equipment or organizational changes; and

   c. the means to verify attendee performance against training objectives.

2. Provisions for sufficient space in the Emergency Operations Facility (EOF) and Alternate EOF to enable effective direction, coordination and evaluation of all licensee activities during emergency conditions. (See Section 4.1.1.4)

3. Development of plans/schemes and procedures for handling, storing, transferring, analyzing and discharging post-accident liquid wastes. (See Sections 4.1.1.8, 5.4.2.10 and 5.4.2.11)

4. Provisions for communications and other equipment needed to operate the News Center consistent with its designated functions during an emergency as well as for security at the News Center. (See Section 4.1.4)

5. Development of unambigious Emergency Action Levels based on control room and plant instrumentation and conditions, including appropriate references between the Emergency Operating Procedures and the appropriate emergency classification in the Emergency Plan. (See Section 5.2)

6. Provisions for making protective action decisions based on current and projected plant status and conditions, i.e., for accident situations in which minimal radiological releases have occurred, but plant status, as evidenced from instrumentation, is deteriorating. (See Sections 5.3 and 5.4.2)

7. Provisions for communicating protective action recommendations based upon plant system parameters and/or radiological dose projections directly to the local offsite authorities responsible for implementing protective measures within the plume EPZ. (See Section 5.4.2)

8. Revision of Procedure HPP 3.4 to include: pre-task supervisory briefings concerning precautions and prerequisites to be observed based upon unusual plant/radiological conditions expected and mission direction; provisions for communication (with designation of backup means) of data, including transmittal of original data sheets to the organizational element responsible for assessment; provisions of data sheets to assure recording of pertinent data relevant to the surveys; and provisions for labeling collected samples for future identification and analyses, and for a central collection point for such samples. (See Section 5.4.2.3)

9. Development of procedures for maintenance of security during emergency conditions. (See Section 5.4.4)

10. Development and implementation of a program for dissemination of information to the public and the news media regarding the actions to be taken by individuals within the plume EPZ during an emergency. (See Sections 5.4.7, 6.2 and 6.3)

APPENDIX B

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Indian Point 3 Emergency Preparedness Program conducted May 11-15, 1981, the following items should be considered for improvement: (References are to Sections in Office of Inspection and Enforcement Inspection Report No. 50-286/81-05)

1. Clarification of the interface between the corporate and site emergency organizations as they pertain to the Plant Operations Manager. (See Section 1.3)

2. Provisions for an on-call TSC Manager at all times. (See Section 2.1)

3. Provisions of written agreements with contractors for health physics staff support for emergency conditions extending beyond 24 hours. (See Section 2.2)

4. Designation of emergency preparedness instructor selection and qualification criteria. (See Section 3.1)

5. Provision of dedicated communication links from the TSC to State and local government response agencies. (See Section 4.1.1.2)

6. Re-evaluation of the primary coolant sampling and analytical facilities for adequacy assuming a 10 Ci/g primary coolant source term. (See Section 4.1.1.5)

7. Provision of appropriate shielding for transporting collected containment air samples to the radioanalytical laboratory and provisions for the storage/maintaining of the samples obtained. (See Section 4.1.1.6)

8. Determination of the representativeness of post-accident airborne effluent particulate sampling. (See Section 4.1.1.7)

9. Performance of an engineering study of the existing ARM system to upgrade post-accident radiation level mapping capability and to extend the upper limit of detection. (See Section 4.2.1.2)

10. Justification of the positioning of meteorological instruments mounted on the primary tower or relocation of these instruments to conform to Regulatory Guide 1.23. (See Section 4.2.1.4)

11. Determination of whether 15-minute averaged data from the backup meteorological tower reasonably represent information from the primary system (i.e., the site meteorology) and if not representative, appropriate modifications to assure representativeness of the backup tower data. (See Section 4.2.1.4)

12. Provisions for additional respiratory protection equipment for use during emergencies. (See Section 4.2.2.1)

13. Provision of direct means of communication other than land-line telephone (e.g., a radio system) from the EOF to offsite authorities to ensure capability of communicating protective action recommendations in the event that telephone systems are unusable. (See Section 4.2.3)

14. Revision of emergency procedures to incorporate the use of the New York State Police radio located in the control room. (See Section 4.2.3)

15. Provision of prepared messages for informing response groups including State and local officials, during the initial notification sequence, of the emergency classification and any protective action recommendations based on current and projected plant status and conditions, as well as radiological dose projections. (See Section 5.4)

16. Provisions for including pertinent railroad lines in the notification scheme. (See Section 5.4)

17. Data sheets which include provisions for recording the date and time of each survey, the names of the technicans, the duration of the meter readings, the instruments used by type and serial number, as well as air sample count times. (See Section 5.4.2.2)

18. Specification in Procedure IP-1005 and IP-1010 of the organizational element to whom collected data and the data sheets are to be provided for emergency assessment. (See Section 5.4.2.2)

19. Provision of data sheets for post-accident primary coolant sampling in Procedure RE-CS-042, Revision 2. (See Section 5.4.2.4)

20. Revision of Procedure RE-CS-042, Revision 2, to include: provisions/precautions for contamination control during post-accident sampling and analyses; provisions for analysis of above samples if primary analytical area has elevated radiation levels; provision of data sheets; and provisions for transmitting the data, as well as, the original data sheets to the organizational element responsible for assessment. (See Sections 5.4.2.5, 5.4.2.6, 5.4.2.7, 5.4.2.8 and 5.4.2.9)

21. Revision of the post-accident sampling and analytical procedures to include provisions for: valving diagrams and schematics; checklists for assuring task completion; and labeling, transporting, handling and storage of high activity samples. (See Sections 5.4.2.6 and 5.4.2.8)

22. Revision of post-accident sample analytical procedures to include provisions for analyzing high activity particulate and iodine samples. (See Sections 5.4.2.7 and 5.4.2.9)

23. Revision of Procedure IP-1018 and other relevant procedures to detail the method by which the Emergency Director is to orchestrate the REMP sample collection and analyses, and to provide, as far as practicable, for preplanned sample collection frequencies for various magnitudes and modes of activity releases following an accident. (See Section 5.4.2.12)

24. Modification of Procedure IP-1060 to include provisions: to ensure that all personnel leaving restricted areas or other areas suspected to be contaminated and individuals in assembly and reassembly areas are monitored for contamination; for maintaining records of all individuals checked for contamination; for special considerations for skin contaminated with radioiodine; and for ensuring that collected data are provided to the organizational element responsible for radiation protection during emergencies. (See Section 5.4.3.4)

25. Provision of specific instructions, guidance and criteria in IP-1020, IP-1021, IP-1022, and IP-1054 to ensure the proper instruments and techniques are used. (See Section 5.4.3.5)

26. Procedural provisions for: development and review of ad hoc procedures for repair and corrective actions during emergencies; team practice of corrective actions to be performed prior to entry into high radiation areas; clarification as to how REAs are to be executed during accident conditions; and use of a survey instrument for the team with a range sufficient to measure radiation fields of 1000 R/hr or more. (See Section 5.4.5)

27. Specification of specific criteria upon which the emergency classes will be downgraded and for entering the recovery mode. (See Section 5.4.6)

28. Provisions for notification of Federal, State and local officials and response organizations prior to entering a downgraded or recovery mode. (See Section 5.4.6)

29. Verification and documentation that inventories of emergency equipment designated for common use for emergencies at Indian Point Unit 2 and Indian Point Unit 3 are correct and that routine equipment operability checks were performed. (See Section 5.5.1)

30. Provisions for dating "call-in rosters" to ensure that the current revisions are properly distributed and in use. (See Section 5.5.3)

31. Coordination of the interface between the licensee and NRC Region I through the Region I Emergency Preparedness Coordinator concerning the work space and communication needs of the NRC emergency response organization. (See Sections 4.1.1.4 and 6.1)

32. Provision of a written agreement with Consolidated Edison concerning transfer of post-accident liquid effluents, if such transfers are considered as an option. (See Sections 4.1.1.8 and 6.1)