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February 12, 1982

Mr J G Keppler, Regional Administrator
Region III
U S Nuclear Regulatory Commission
799 Roosevelt Road
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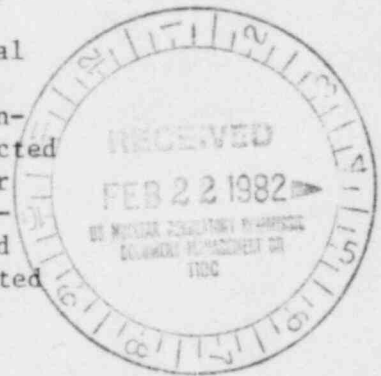
Dear Mr Keppler:

PRAIRIE ISLAND NUCLEAR GENERATING PLANT
Docket No. 50-282 License No. DPR-42
50-306 DPR-60

Subject: Emergency Preparedness
Exercise Inspection Report Response

Your letter dated January 20, 1982 requested a written statement within twenty-five days describing planned actions for improving each of the items identified in Appendix A. In accordance with that request, we are submitting a response for each item identified as an exercise deficiency.

Item 1. The licensee conducted an inadequate technical review of the data provided in the scenario. Reactor coolant pressure/temperature relationships given to the Control Room staff conflicted with the corrective actions which the reactor operators should have taken. Further, radiological monitoring data provided to the field monitoring teams did not represent the expected conditions from the scenario.



Response:

Additional personnel have been allocated to work on scenario development for future exercises. We are currently interviewing to fill these positions. It is expected these positions will be filled by May 1, 1982. Use of additional personnel will allow time for more comprehensive management and technical review of the scenarios and the data which will be required. Future scenarios will be based on a standardized approach to development of key thermal-hydraulic data and radiological offsite data. Full compliance is expected by June 1, 1982.

- Item 2. The sequence of events listed in the scenario caused the exercise participants to implement onsite actions and make protective measures recommendations prior to the expected times agreed upon with the offsite agency controllers. As a result, the offsite agency controllers were not able to control some offsite actions. The NRC, FEMA, State, and local officials recognize that under realistic conditions, events can occur such as they did during the exercise, however, for the purpose of demonstrating capabilities during an exercise, the controllers (both onsite and offsite) must steer the exercise as provided for in the scenario.

Response:

In future exercises onsite controllers will have more authority in controlling information provided to state agencies. To cover this item, additional controllers will be provided to monitor Emergency Director - Emergency Manager communications at the TSC and Radiological Emergency Coordinator - Radiological Support Supervisor Communications at the EOF. These controllers can take control as required. Full compliance is expected by March 1, 1982.

- Item 3. Scenario development and approval did not follow the provisions of FEMA Memorandum Guidance No. 17. Enclosure 1 of that guidance provides milestones for exercise observation and critiques. Specifically, NRC was not provided with a final scenario until one day prior to the exercise.

Response:

Future scenario development will be keyed to the milestones established in your January 12, 1982 letter which is consistent with FEMA Guidance Memorandum No. 17. Compliance is expected by April 1, 1982.

- Item 4. Controllers of the exercise were not provided proper instructions and guidance relevant to their roles, responsibilities, and authorities during the exercise. During the exercise, some controllers were observed prompting the participant to implement actions which the exercise was designed to test. Further, the controllers should have stopped actions which caused the exercise to go astray from the design of the scenario.

Response:

An updated list of controller responsibilities will be prepared, specifically with regard to -
1. extent of authority and 2. prompting. Full compliance is expected by March 1, 1982.

- Item 5. Records management and followup notifications to offsite agencies from the TSC were inadequate. According to the Emergency Plan, followup notification shall be made to offsite authority justifying the recommended accurate protective measures. During the exercise the licensee recommended protective measures to offsite authorities but failed to provide followup notification which would justify their recommendation. Further, review of exercise records, indicated no documentation which technically justified the recommended protective actions.

Response:

- (1) Records Management - Procedures and forms used by key emergency organization personnel in the TSC are being reviewed to ensure that:
 - (a) Procedures specify and require logging of necessary data;
 - (b) Forms required to be completed are minimal in number, yet contain sufficient data to re-construct all actions and responses made during the course of the emergency situation (e.g. justification for Protective Action Recommendations);
 - (c) Management of records is improved to ensure flow of information from various TSC areas to the ED and then appropriate records filing area.
- (2) Protective Action Recommendation - Plant and corporate procedures are being reviewed to ensure that offsite agencies are provided technical justification for offsite Protective Action Recommendations and that appropriate followup to such recommendations is conducted.

We expect this to be completed by June 1, 1982.

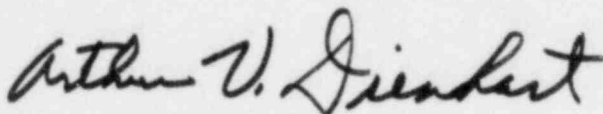
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Item 6. During the exercise, the inspectors noted that proper onsite public address messages were not given specifically informing the onsite personnel that an emergency exists (proper classification) and a description of the nature of the emergency.

Response:

Emergency Plan Procedures are being reviewed to ensure that whenever an emergency declaration is made, or whenever the emergency classification is changed, the proper public address announcements are made to ensure all onsite personnel are aware of such actions. Procedures will be changed to ensure field survey teams are also kept informed of the release hazards, classification changes, etc.

We expect this to be completed by May 1, 1982.



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for

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