

22 FEB 1982

Docket No. 50-220

Niagara Mohawk Power Corporation
ATTN: Mr. T. E. Lempges
Vice President Nuclear Generation
300 Erie Boulevard, West
Syracuse, New York 13202



Gentlemen:

Subject: Emergency Preparedness Appraisal 50-220/81-18

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 August 17-28, 1981, the NRC conducted an appraisal of the emergency preparedness program for Nine Mile Point Nuclear Station Unit 1. Areas examined during this appraisal are described in the enclosed report (50-220/81-18). 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. Ill-defined emergency organization and non-specific assignment of personnel to the various functional areas of emergency activity;
2. Inadequate post-accident sampling and analysis equipment and procedures;
3. Inadequate provisions for detection and measurement of airborne radioiodine under field conditions in the presence of noble gases.
4. Discrepancies in emergency implementing procedures (e.g., improper radiological controls).

RI:DEPOS Terc/tgl	RI:DEPOS Shocker	RI:DEPOS Snyder	RI:DEPOS Smith 2/18	E&I Carlson	RI:DEPOS 2/19	RI:DEPOS Haynes 2/19
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Significant findings for which you have made acceptable commitments to resolve were discussed in the confirmatory action letter dated September 8, 1981. A copy of the letter is enclosed.

Other areas needing improvement 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 Regulations.

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.

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

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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,

for James M. Allan
Ronald C. Haynes
Regional Administrator

Enclosures:

1. Appendix A, Significant Emergency Preparedness Findings
2. Appendix B, Emergency Preparedness Improvement Items
3. Appendix C, Emergency Preparedness Evaluation Report
4. NRC Region I Inspection Report No. 50-220/81-18
5. Confirmatory Action Letter dated September 8, 1981

cc w/encls:

T. Perkins, General Superintendent, Nuclear Generation
T. Roman, Station Superintendent
J. Aldrich, Supervisor Operations
W. Drews, Technical Superintendent
Leonard M. Trosten, Esquire
Carl D. Hobelman, Esquire
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
State of New York
NRC Resident Inspector

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 Nine Mile Point Nuclear Station Unit 1 Emergency Preparedness Program conducted August 17-18, 1981, the following improvements are required: (References are to sections in the NRC Region I Inspection Report No. 50-220/31-18).

1. Revise the emergency organization to provide for all the emergency functions required during initial, intermediate and final phases of augmentation; update the site Emergency Plan to describe the revised organization; and issue revised implementing procedures as necessary to be consistent with the revised organization. The updated description in the plan shall include a sufficient level of detail to: unambiguously delineate the command hierarchy; clearly specify its structure, reporting chains and inter-relationships at any phase of augmentation; and, include supervisory as well as non-supervisory elements. (See Section 2.1)
2. Provide approved lists of personnel in the emergency organization segregated by individual training qualification which reflects each functional area specified within the emergency organization. These lists shall identify the current training status of each individual. Provisions to maintain the lists current shall be developed and implemented. (See Section 2.1)
3. Develop a document to implement the Emergency Plan training program including the alignment of the training categories with the functional areas of emergency activity in the emergency organization. (See Section 3.1)
4. Provide training/retraining for all individuals with specific functional duties in the emergency organization to meet schedule requirements, and additional training between scheduled sessions, as needed, to update recipients on changes in emergency response (e.g. equipment, procedures). (See Section 3.1)
5. Develop a training course to cover all aspects of post-accident sampling. (See Section 3.1)
6. Complete the installation of ventilation and protective equipment to ensure the habitability of the TSC during the various accident scenarios, and rearrange communication equipment so that clustering of phones and personnel is prevented. (See Section 4.1.1.2)
7. Re-evaluate interim facilities and equipment used for post-accident coolant sampling and analysis during accidents to determine maximum concentrations that could be sampled, handled and analyzed. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.5)

8. Re-evaluate interim facilities, equipment for sampling and analysis of the drywell atmosphere, to determine maximum concentrations that could be sampled, handled and analyzed. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.6)
9. Re-evaluate facilities and equipment for sampling and analysis of noble gases, radiiodines and particulates to determine maximum concentrations that could be sampled and analyzed during accidents. Provide a written report of the results to the NRC Region I Office and include a schedule of any planned actions. (See Section 4.1.1.7)
10. Complete the radioactive waste storage and demineralizer system to provide additional storage capacity for radioactive liquid wastes that may be generated during accidents. (See Section 4.1.1.8)
11. Provide appropriate facilities and supplies needed to decontaminate the number of persons that might be expected to be contaminated during severe emergencies. (See Section 4.1.2.3)
12. Provide work facilities and resources in the vicinity of the site which would be available for corporate, contractor, and non-licensee augmentation personnel in the event of a large, prolonged response. (See Section 4.1.3)
13. Provide space and install communications and other equipment in the Emergency News Center, as needed to ensure the performance of its designated functions during emergencies. (See Section 4.1.4)
14. Provide portable instruments to measure radioiodine from cartridges in accordance with criteria set forth by NUREG-0654. (See Section 4.2.1.1)
15. Rewrite Implementing Instructions for each emergency class, from the perspective of the ED to orchestrate other detailed emergency implementing procedures, so that a coherent emergency direction is made possible. (See Section 5.3)
16. Prepare an overall procedure which integrates the various sources of radiological assessment information to allow the RAC to make a coherent response and enable him to estimate the radiological consequences resulting from the various accidents scenarios. (See Section 5.4.2)
17. Clarify and simplify the dose assessment calculation procedure (EPP-8). (See Section 5.4.2)
18. Review procedures for dose projections and protective action recommendations to take into account uncertainty of plume locations. (See Section 5.4.2)
19. Review EPP-7 and 8 to include guidance on how to deal with errors resulting from variance in the plume pathway. (See Section 5.4.2)

20. Revise EPP-6 to include: radiation protection precautions for unusual plant conditions; radiological survey and sample counting instructions (within the action steps); time of dose rate measurements; techniques for taking radiation measurements (e.g. ground level versus waist level); and, disposition of original data sheets. (See Section 5.4.2.3)
21. Revise NI-PSP-10 to include limiting exposure; clear assignment of responsibility; a check list for radiological precautions to be taken during sampling, transportation and analysis; communications; maximum concentrations of radioactivity in the sample for handling and analysis; and ALARA considerations. (See Section 5.4.2.4)
22. Develop a procedure for analyzing liquid waste samples resulting from severe accidents. (See Section 5.4.2.11)
23. Revise EPP-04 and -15 to include specific guidance on technique for personnel monitoring for the number of persons expected during emergencies; and cross-references to decontamination and follow-up bioassays. (See Section 5.4.3.4)
24. Develop procedure to orchestrate the transition from an emergency classification to a recovery mode, including specific criteria upon which the emergency classes will be downgraded and provisions for notification of federal, state and local officials prior to entering a downgraded mode. (See Section 5.4.6)

APPENDIX B

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Nine Mile Point Nuclear Station Unit 1 Emergency Preparedness Program conducted August 17-28, 1981, the following items should be considered for improvement: (Reference: are to sections in NRC Region I Inspection Report No. 50-220/81-18).

1. Formally assign a Corporate EPC or another qualified individual to assist the site EPC so that all aspects of the development and maintenance of the site and corporate emergency response capability are addressed with sufficient depth. (See Section 1.1)
2. Outline of a scheme to ensure that a sufficient number of professionals and technicians will be available to support a continuous emergency response beyond 24 hours. (See Section 2.2)
3. Upgrade emergency training material in the Security Department to ensure consistency with present Emergency Plan and Procedures. (See Section 3.1)
4. Provide formal documentation for emergency training program conducted for all offsite organizations; including responsibilities for training in each area, frequency of training, instructors' lesson plans and record keeping. (See Section 3.1)
5. Provide means to ensure that all personnel assigned emergency functions are properly trained and qualified to fulfill their duties; and are made cognizant of their responsibilities during emergency conditions. (See Section 3.2)
6. Provide a separate office for NRC personnel with adequate habitability and communications. (See Section 4.1.1.2)
7. Complete and rearrange the communications network in the EOF to improve its efficiency and lower noise levels. (See Section 4.1.1.4)
8. Develop means for calibrating the high range survey meters for high radiation fields. (See Section 4.2.1.1)
9. Describe the method to deal with illegible wind direction traces during on-shore flow conditions. (i.e. A 0-360 degrees wind vane rather than 0-540). (See Section 4.2.1.4)
10. Establish an alternate stability class determination scheme for use when the primary source of information cannot provide this parameter. (Consider the data types available from the alternate data sources). (See Section 4.2.1.4)

11. Include the characteristic wind direction traces to determine atmospheric stability class in EPP-8 rather than depend on posted material external to the plan or procedures. (See Section 4.2.1.4)
12. Identify the method for adjusting wind speed measurements (32' or 200') to the characteristic release height (32' or 350'). (Wind speed profiles, for example could be used to apply the appropriate value to the dose projection contingent on release pathway.) (See Section 4.2.1.4)
13. Relocate the cascade generator to an area which would be accessible under accident conditions to provide quality breathing air, and obtain written agreements with offsite groups to ensure alternate air refilling services. (See Section 4.2.2.1)
14. Develop means to permit audible radio communications within the plant. (See Section 4.2.3)
15. Include cross-references to specific EOP in operating procedures. (See Section 5.2)
16. Review EPP-7 and 8 to include radiological protection measures for survey team members, backup communications and a protocol for relaying survey results. (See Section 5.4.2.1)
17. Revise EPP-7 to include radiation protection guidelines and modify data sheets to provide space for recording the time at which each sample was taken, and team member's names. (See Section 5.4.2.2)
18. Specify how to dispose of samples and provide instructions indicating the flow of information from field survey teams to other elements of the emergency organization. (See Section 5.4.2.2)
19. Review procedure used for primary coolant analysis to instruct the user on relaying information to organizational elements performing assessment functions (e.g. EO, RAC). (See Section 5.4.2.5)
20. Reevaluate procedures for containment (dry well) sampling in accordance with findings in Section 4.1.1.6. (See Section 5.4.2.6)
21. Review NI-PSP-11 to include instruction for the user to forward data to organizational elements performing offsite dose assessment (e.g. RAC, ED) and how to dispose of samples. (See Section 5.4.2.7)
22. Review Stack Effluent Sampling Procedure to incorporate guidelines for: conducting pre-entrance precautionary meetings during off-shifts; handling highly radioactive charcoal and other filter media; and relaying data to organizational elements in charge of making offsite dose assessment. (See Section 5.4.2.8)

23. Review NI-SP-7 to include radiological precautions expected when handling and analyzing highly radioactive samples and instructions for the user to relay information to emergency personnel responsible for offsite assessment actions (e.g. ED, RAC). (See Section 5.4.2.9)
24. Develop a procedure for sampling liquid wastes which addresses the radiological conditions expected during severe accidents. (See Section 5.4.2.10)
25. Revise emergency implementing procedures to include responsibilities for radiological protection (e.g., briefings of emergency personnel, dosimetry, etc) in the action steps portion of the procedures. (See Section 5.4.3.1)
26. Include provisions for evacuation of park area around the EIC. (See Section 5.4.3.2)
27. Include body sketches and data sheets to record decontamination progress. (See Section 5.4.3.4)
28. Provide consistent personnel decontamination limits between the Emergency Plan and those stated in EPPP-04 and 19. (See Section 5.4.3.4)
29. Incorporate into EPP-22 the criteria and logistics of selection of team members and communication means to be employed. (See Section 5.4.5)
30. Revise EPP-21's format to clearly outline responsibilities, guidelines and specific sequential actions required of the various individuals dealing with public information during accidents. (See Section 5.4.7)
31. Develop provisions for responding to public inquiries separate from the news media. (See Section 5.4.7)
32. Revise of EPP-10 to include: unambiguous specification of radiation survey instrumentation consistent with their intended use; development of procedures for operationally checking the same; and a criteria for acceptance or rejection of instruments. (See Section 5.5.1)
33. Review Emergency Plan and procedures to include a requirement for updating letters of agreement with offsite support agencies. (See Section 6.1)
34. Disseminate emergency planning information brochures to the public within the plume exposure EPZ. (See Section 6.2)
35. Review the Emergency Plan to include a description of the media educational program, responsibilities, implementation dates and its frequency. (See Section 6.3)