

MAR 23 1982

Docket No. 50-346(DEPOS)

Toledo Edison Company
ATTN: Mr. Richard P. Crouse
Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

Subject: Emergency Preparedness Appraisal



To verify that licensees have attained an adequate state of onsite emergency preparedness, the Office of Inspection and Enforcement is conducting special appraisals of the emergency preparedness programs at all operating nuclear power reactors. The objectives of these appraisals 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 February 8-19, 1982, the NRC conducted a special appraisal of the emergency preparedness program at the Davis-Besse Nuclear Power Station. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. Areas examined during this appraisal are discussed in the enclosed 50-346/82-01 report. Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

Significant deficiencies for which you have made acceptable commitments to resolve are discussed in the Confirmation of Action Letter dated February 23, 1982, enclosed as Appendix A.

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

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

Several areas in your emergency preparedness program were not complete at the time of this appraisal and therefore were not examined. These items are identified as Open Items and are listed in the enclosed Appendix D. These will be examined by our staff upon complete implementation of the area involved. Please notify our office relevant to your completion schedule for these items for re-examination by our staff.

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 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. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations. With regard to Appendix C, within 90 days of the date of this letter, you are requested to provide changes to the emergency plan correcting each deficiency. Copies of these changes are to be submitted in accordance with the procedures delineated in 10 CFR 50.54(q).

This is to inform you that should the deficiencies addressed in the Confirmation of Action Letter of February 23, 1982, not be corrected by the commitment dates provided, the Commission will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosures, and your response to this letter 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 twenty-five (25) days from the date of this letter a written application to this office to withhold such information. If your receipt of this letter has been delayed such that less than seven (7) days are available for your review, please notify this office promptly so that a new due date may be established. Consistent with Section 2.790(b)(1), 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 which are the bases for the claim 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, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

The responses directed by this letter (and the accompanying Notice) are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 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. W. B. Grant, Emergency Preparedness Section, at (312)932-2536.

Sincerely,

Original signed by
James G. Keppler

James G. Keppler
Regional Administrator

Enclosures:

1. Appendix A, Confirmation of Action Letter dtd 2/23/82
2. Appendix B, Preparedness Improvement Items
3. Appendix C, Emergency Preparedness Evaluation Report
4. Appendix D, Open Items
5. Inspection Report
No. 50-346/82-01(DEPOS)

cc w/encls:

T. D. Murray, Station
Superintendent
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Power Siting
Commission
Helen W. Evans, State of Ohio
Robert M. Quillin, Ohio
Department of Health

RIII

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3/22/82

Appendix A

CONFIRMATION OF ACTION LETTER

Docket No. 50-346

Toledo Edison Company
ATTN: Mr. Richard P. Crouse
Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

This letter is to confirm agreements reached between you and others of your staff, and Mr. W. Axelson and other members of the NRC staff on February 19, 1982, during the management exit interview following the NRC Emergency Preparedness Appraisal.

Immediate corrective actions are required for significant Appraisal Findings. The exact nature of the required actions, as well as the agreed upon dates for such actions, are as follows:

1. Procedure for Implementation of Emergency Plan

Required Actions

- a. The licensee shall provide a schedule for installation and calibration of a upgraded seismic monitoring system which will be capable of determining earthquakes greater than OBE levels (Alert Emergency) and SSE levels (Site Area Emergency). EALs shall be calculated for OBE and SSE levels and incorporated into the Emergency Plan and its procedures. (Sections 4.1.13 and 5.2) (346/82-01-02)

This shall be completed by March 22.

- b. All operations crew personnel (licensed operators) shall be retrained relevant to implementation of Special Procedure 1105.17, Seismic Monitoring System Procedure. (Section 5.2) (346/82-01-03)

This shall be completed before startup following the forthcoming refueling outage.

- c. Documented guidance and training shall be provided for the operating crew (licensed operators) to cope with a loss of vital DC power. This shall include provisions to ensure that the Shift Supervisor will classify such an event in accordance with the Emergency Plan. (Section 5.2) (346/82-01-04)

This shall be completed before startup following the forthcoming refueling outage.

- d. EALs shall be developed for the main steam line radiation monitors (N-16) for those events listed in Table 4-1 of the Emergency Plan. In addition, training shall be provided to appropriate radiation assessment personnel relevant to the use of the EALs. (346/82-01-05)

This shall be completed before startup following the forthcoming refueling outage.

If our understanding of your planned actions described above is not in accordance with the actual plans and action being implemented, please contact this office by telephone and in writing within 24 hours. Further, please inform this office, in writing, upon completion of all the above action items.

Sincerely,

James G. Keppler
Regional Administrator

cc: T. D. Murray, Station
Superintendent
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
Harold W. Kohn, Power Siting
Commission
Helen W. Evans, State of Ohio
Robert M. Quillin, Ohio
Department of Health

Appendix B

PREPAREDNESS IMPROVEMENTS ITEMS

Based on the results of the NRC's appraisal of the Davis-Besse Nuclear Power Station Emergency Preparedness Program conducted February 8-19, 1982, the following items should be considered for improvement:

1. The individual who is specifically in charge of emergency operations when the Operations Director is unavailable should be identified. (Section 1.2)
2. The personnel call out list should be prioritized to assure that the expertise required in Table B-1 of NUREG-0654 can be identified. (Section 2.2.2)
3. Off hours shift augmentation drills should be conducted to evaluate whether the call out system can meet the goals of Table B-1 of NUREG-0654, Revision 1. These drills should be conducted quarterly, documented, and used to identify and correct deficiencies in the call out procedure. (Section 2.2.2)
4. The Operations Support Center should be equipped with fixed emergency lighting. (Section 4.1.1.3)
5. All primary coolant sample lines at the rear of the emergency sample module should be provided with shielding. (Section 4.1.1.5)
6. Table 3 of the Emergency Plan Administrative Procedures Section Administrative Directive (AD) 1827.10 should be revised to include Xu/Q values for the G stability class when the new Class A model meteorology system is adopted. (Section 4.2.1.4)
7. An HPN telephone should be installed in the Technical Support Center. (Section 4.2.3)
8. Procedure AB 1203.06, Inadequate Core Cooling Guidelines, should be revised to insure that the Shift Supervisors and reactor operators do not omit the need for implementing Emergency Instructions (EIs) in accord with the reference provided in Emergency Procedure (EP) 1202.06. (Section 5.2)
9. Existing procedures should indicate where post accident samples are to be stored and disposed of after analysis. (Sections 5.4.2.4 and 5.4.2.6)
10. Access and egress routes based on projected radiation levels in corridors and hallways should be provided for the sample team obtaining the post accident samples to insure ALARA is adhered to. (Sections 5.4.2.4 and 5.4.2.6)

11. Procedure AD 1850.04 should be upgraded to provide for the transportation and relocation of the multichannel analyzer and GeLi crystal. (Section 5.4.2.4)
12. The Industrial Security Plan Procedure AD 1808.00 should be revised to include specific steps involved in personnel accountability, how this accountability is maintained throughout the emergency and how missing personnel are identified. A cross reference with Supporting Procedure, Search and Rescue, AD 1827.16 should be included. (Section 5.4.3.3)
13. The licensee should procedurally specify how the corporate response organization will be mobilized. Sufficient personnel are available to accomplish this, but no detail presently exists in the notification procedures. (Section 2.2.1)
14. A formal training program for the corporate emergency response organization should be established. (Section 3.2)
15. Formal generic training, as well as specific training, should be conducted for offsite agencies in the Emergency Plan and Procedures. (Section 3.2)
16. The training records should be improved to assure that complete, up-to-date, and timely information is available on the emergency preparedness training program. (Section 3.2)
17. The use of the classroom style training session should be continued in addition to any prerecorded audio-visual program that is established to ensure program accuracy, allow for a more in-depth specialized curriculum, and encourage student/instructor interaction. (Section 3.2)
18. A method to test the students understanding of emergency training course material should be provided. (Section 3.2)
19. A system to promptly train emergency personnel when significant changes occur in policy, plans, or procedures should be provided. (Section 3.2)
20. HP 1602.01 (External Personnel Monitorings) should be replaced by emergency personnel monitoring procedures which describe the personnel monitoring function during emergencies, including provision for TSC, ECC, and OSC personnel. (Section 5.4.3.4)
21. Those Emergency Implementing Procedures (EIs) containing directions to contact the Station Superintendent should specifically allow the Shift Supervisor to exercise judgment. (Section 5.1)
22. A comprehensive review should be made of the red-blue color coding/annunciation portion of the newly installed fire protection system by the licensee's technical/management staff. (Section 5.4.8)

Appendix C

EMERGENCY PREPAREDNESS EVALUATION REPORT

The following is a list of deficiencies identified in the Davis-Besse Nuclear Power Station Emergency Plan (September 1, 1981, Revision 3). These deficiencies are categorized as per the planning standards of 10 CFR 50.47(b). These deficiencies as well as those listed in Appendix A must be corrected in accordance with the provisions of 10 CFR 50.54(s)(2):

PLANNING STANDARD 50.47(b)(2) (ONSITE EMERGENCY ORGANIZATION)

(346/82-01-06)

- . The Plan does not specify how minimum shift staffing requirements as per Table B-1 of NUREG-0654 will be established.
- . The Plan does not specify how shift augmentation will be ensured. Specifically the Plan does not describe the administrative means (e.g., studies and/or drills) implemented to ensure that the design goals of shift augmentation are met as described in Criterion II B.5. of NUREG-0654, Revision 1.
- . In Figure 5-3 of the plan, (Onsite Emergency Organization), change the location indicated for the Operations Director from Edison Plaza to Emergency Control Center.
- . In Section 5.2.2.1 of the Emergency Plan, revise the description of responsibilities for the Plant Operations Manager and the Operations Engineer to reflect a concept of supporting and advising the Shift Supervisor so that no confusion exists regarding who is in charge of control room activities.

PLANNING STANDARD 50.47(b)(3) (EMERGENCY RESPONSE SUPPORT AND RESOURCES)

(346/82-01-07)

- . The plan does not specify how long it will take for Federal resources (DOE) to arrive at the nuclear facility if requested, and specify the availability of resources needed to support the Federal response, such as air fields, command posts, and communications capability.
- . The plan does not specify who is likely to be sent by corporate management to the local Emergency Operating Center (EOC) and indicate who has the responsibility for assuring the person is dispatched to the EOC.

PLANNING STANDARD 50.47(b)(4) (EMERGENCY CLASSIFICATION SYSTEM)(346/82-01-08)

- . The Plan does not adequately provide Emergency Action Levels (EALs) as per Appendix 1 of NUREG-0654, Revision 1, in the following areas:

UNUSUAL EVENT

- . Initiating Condition 7 (loss of power). The licensee used the term "sustained loss of offsite power." The word sustained should be removed as it is misleading.

ALERT

- . Initiating Condition 2 (gross failure of one steam generator tube with loss of offsite power). The licensee interpreted this initiating condition to mean leak rates of over 400 gpm whereas the intent of NUREG-0654 included smaller leak rates (i.e., 100-200 GPM). The licensee's EALs are acceptable for leak rates over 400 gpm but should be modified to include lower leak rates.
- . Initiating Condition 8 (loss of DC power). The word "sustained" should be removed from the licensee's EAL.

SITE EMERGENCY

- . Initiating Condition 3 (rapid failure of steam generator tubes-several hundred gpm leakage) with loss of offsite power. The EAL set is based upon a leak rate in excess of 1000 gpm. The EAL set should be modified so that it applies to any leak in excess of several hundred gpm (i.e., 400-700 GPM).
- . Initiating Condition 13 (dose rates at site boundary). The EAL's should be revised to express radiation in terms of dose rate rather than dose.

GENERAL EMERGENCY

- . EALs have not been calculated for those PWR sequences which could lead to a core melt and likely failure of containment. (See pages 1-18 of Appendix 1 in NUREG-0654, Revision 1).

- . When the new Kamen High Range Station Vent System is installed, EALs need to be calculated for those dose rates as per Appendix 1 of NUREG-0654. EALs need to be calculated for those dose rates applicable for a Site Emergency also, after installation of the Kamen system.

PLANNING STANDARD 50.47(b)(5) (NOTIFICATION METHODS AND PROCEDURES)

(346/82-01-09)

- . The Plan does not provide the content for written messages intended for the public to assure consistency with the licensee's classification scheme. A discussion of the format of the messages to the public giving instructions regarding specific protective actions to be taken by occupants of affected areas should be included in the plan. A statement defining who will issue the messages, licensee or local authorities should also be added.

PLANNING STANDARD 50.47(b)(8) (EMERGENCY FACILITIES AND EQUIPMENT)

(348/82-01-10)

The Plan does not specify how NUREG-0696 criteria will be met. This information should include:

- . The types of equipment available in the TSC and EOF identified in NUREG-0696, including types and locations of communications equipment.
- . When commitments are fully implemented as stated in the Plan, then the Plan must be revised to reflect these changes; i.e., installation of post-accident monitoring and sampling systems, process monitors, TSC and EOF as floor plans.
- . The Plan contains no provisions for acquisition of data on hydrological and seismic parameters from offsite sources.

PLANNING STANDARD 50.47(b)(10) (PROTECTIVE RESPONSE)

(346/82-01-11)

- . The Plan does not specify capabilities to decontaminate evacuated personnel at the offsite assembly point.

- . The time required to warn or advise onsite personnel is not stated in the plan. The means used to warn or advise contractor/construction personnel and individuals who may be in the owner controlled area but outside the protected area is not addressed.
- . The means for transporting evacuated onsite personnel is not addressed.
- . The plan fails to state if personnel can be accounted for within 30 minutes of the declaration of an emergency or if continuous accountability can be maintained after the initial effort.
- . The plan fails to indicate if protective actions will be in accordance with recommendations in EPA-520/1-75-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents."

PLANNING STANDARD 50.47(b)(11) (RADIOLOGICAL EXPOSURE CONTROL)

(346/82-01-12)

- . The Plan does not define action levels for determining the need for decontamination of personnel nor that the licensee has the capability to remove radioiodine contamination from the skin.

PLANNING STANDARD 50.47(b)(14) (EXERCISES AND DRILLS)

(346/82-01-13)

- . The Plan does not address the requirement to test communications with NRC Headquarters and Region III Operation Center from the TSC, EOF and Control Room on a monthly basis. This is required by 10 CFR 50, Appendix E, Section IV E.9.d.

PLANNING STANDARD 50.47(b)(16) (RESPONSIBILITY FOR THE PLANNING EFFORT)

(346/82-01-14)

- . The Plan does not specify training for individuals responsible for emergency planning effort, such as the Emergency Planning and Preparedness Supervisor.
- . There is no provision for an independent review of the emergency preparedness program every 12 months as per 10 CFR 50.54(t).

Appendix D

PREPAREDNESS OPEN ITEMS

The following is a list of Open Items identified in the area of Emergency Preparedness which must be re-examined and completed in accordance with schedules set forth in NUREG-0696 or NUREG-0737:

1. The permanent Technical Support Center is an open item pending approval by the NRC Division of Emergency Preparedness. (Section 4.1.1.2) (346/82-01-15).
2. The permanent Emergency Control Center is an open item pending approval by the NRC Division of Emergency Preparedness. (Section 4.1.1.4) (346/82-01-16).
3. High range 10^8 rad/hr containment dome monitors shall be installed in accordance with NUREG-0737. (Section 4.2.1.2) (346/82-01-17).
4. Seismic monitoring capability shall be upgraded, procedures written, and training provided in accordance with SP 1105.17. (Section 4.2.1.3) (346/82-01-18).
5. Training shall be provided to Auxiliary and Equipment Operators in Health Physics (HP) methods and procedures to ensure they can perform in-plant HP surveys during an emergency. (Section 2.2.2) (346/82-01-19).
6. The permanent Containment Air Monitoring System shall be installed in accordance with NUREG-0737. Procedures for the use of the system and training in the equipment and the procedure shall be provided. (Sections 4.1.1.6, 5.4.2.6, and 5.4.2.7.) (346/82-01-20).
7. Installation, testing and development of procedures covering sampling and analysis using the Kamen Primary Coolant High Range Sampling System must be completed (Sections 4.1.1.5, 4.1.1.8, 5.4.2.4, and 5.4.2.5). (346/82-01-21).
8. Installation, testing and development of procedures covering sampling and analysis using the Kamen Station Vent System must be completed, (Sections 4.1.1.7, 5.4.2.8, 5.4.2.9) (346/82-01-22).