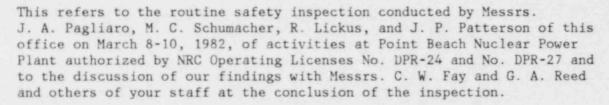
## April 29, 1982

Docket No. 50-266 Docket No. 50-301

Wisconsin Electric Power Company ATTN: Mr. Sol Burstein Executive Vice President Power Plants

231 West Michigan Milwaukee, WI 53201

#### Gentlemen:



The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

We are particularly concerned with the deficiencies identified during this exercise, which in summary includes:

- . inadequate staffing and operation of the Emergency Support Center (EOF as per NRC terminology)
- . inadequate facilities and equipment at the TSC, ESC and Joint Public Information Center (JPIC) particularly record keeping and communication between these facilities
- . inadequate protective measures methodology



inadequate flow of critical information between Emergency Response Facilities and lack of trending of these critical parameters

These deficiencies, listed in Appendix A, lead the NRC staff to the conclusion that additional management attention is necessary in the area of emergency preparedness. Accordingly, you are requested to submit a written statement within forty-five days of the date of this letter describing your planned actions for improving each of the items identified in Appendix A.

In the future, we expect your staff to follow the provisions of FEMA Guidance Memorandum No. 17, <u>Joint Exercise Procedure</u>, which provides for scenario development and approval by NRC and FEMA.

Pursuant to 10 CFR 50, Appendix E, Section F.3 (Training), the NRC staff expects the deficiencies or weaknesses identified in Appendix A to be corrected.

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.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

J./A. Hind, Director

Division of Emergency Preparedness and Operational Support

#### Enclosures:

- 1. Appendix A, Exercies Deficiencies
- 2. Inspection Reports No. 50-266/82-08(DEPOS) and No. 50-301/82-08(DEPOS)

#### cc w/encls:

G. A. Reed, Manager DMB/Document Control Desk (RIDS) Resident Inspector, RIII John J. Duffy, Chief Boiler Inspector Peter Anderson, Wisconsin's Environmental Decade Stanley York, Chairman Public Service Commission

RIII RIII RIII RIII Patterson Lickus Schumacher Axelson Paperiello

# Appendix A

## EXERCISE DEFICIENCIES

- The licensee did not trend analyzed radiological data or equipment status in the control room, the Technical Support Center or the Emergency Support Center. (50-255/82-08-01; 50-301/82-08-01)
- Equipment repair activities were inadequately prioritized by the Control Room staff. Inadequate action was taken to restore an outof-service component cooling water pump. Repair times were not requested and the safety injection pump trip was not investigated. (50-266/82-08-02; 50-301/82-08-02)
- 3. The shift supervisor could not adequately supervise his staff nor could be effectively followup on directions given. His overview responsibilities were compromised because he was continuously involved in telephone conversations, a function which should be delegated. (50-255/82-08-03; 50-301/82-08-03)
- 4. Log keeping in the control room, Technical Support Center and Emergency Support Center was inadequate. There was nobody assigned specifically to keep a running log. As a result, much of the information about the sequence of events was lost. (50-266/82-08-04; 50-301/82-08-04)
- 5. In plant dose rates were not displayed on facility maps in either the TSC or the OSC. (50-266/82-08-05; 50-301/82-08-05)
- 6. The Chemistry and Health Physics (C&HP) Supervisor was overburdened by having responsibility for both in-plant health physics and offsite dose projection at a time when the possibility of a release was imminent. Because responsibility of offsite dose projection was never completely transferred to the Emergency Support Center (ESC), this problem was never alleviated. (50-266/82-08-06; 50-301/82-08-06)
- 7. The ESC was woefully understaffed. The Radcon/Waste manager was particularly overburdened. This together with spotty communications, poor access to plant information, and physical separation from the Site Boundary Control Center (SBCC) whence environmental monitoring was staged prevented the Emergency Support Manager from truly achieving the control visualized. Close proximity of the ESC to the plant also makes habitability of this center questionable under severe radiological plant conditions. (50-266-82-08-07; 50-301/82-08-07)
- 8. The ESC never completely took over offsite dose projections. In effect, both centers performed redundant calculations based on data available in the TSC. (50-266-82-08-08; 50-301/82-08-08)

- 9. NUREG-0654 guidance for radial (360°) evacuation out to two miles was not followed. Evacuation was initially recommended in a 90° sector out to five miles. Accordingly, forecasting or changing meteorological conditions were not considered as part of protective measures. (50-266/82-08-09; 50-301/82-08-09)
- 10. Communications between the TSC and the inplant survey team was poor to nonexistent. (50-266/82-08-10; 50-301/82-08-10)
- 11. SBCC Communications were inadequate. Radio communications were frequently garbled due to interference by the licensee's dispatcher at Appleton, Wisconsin. Communications with the EOF were also hampered by the lack of a dedicated telephone line. It was also apparent that survey team members were unfamiliar with proper procedures for radio communications. Communication with Kewaunee teams would have been impossible because of a lack of appropriate radio frequencies. (50-266/82-08-11; 50-301/82-08-11)
- 12. Communications in the Joint Public Information Center (JPIC) needs to be improved. There are insufficient supplies of telephones for working newspersons and licensee representatives. There was no capability for hard copy telefaxing of data between the ESC and the newscenter. (50-266/82-08-12; 50-301/82-08-12)