Docket No. 50-346

License No. NPF-3

Serial No. 1-261

April 20, 1982

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James G. Keppler, Regional Administrator
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

During the period of February 8 - 19, 1982, your staff conducted an appraisal of the Emergency Preparedness Program at the Davis-Besse Nuclear Power Station, Unit 1. This letter is in response to your March 23, 1982 (Log No. 1-601) report of the Toledo Edison appraisal.

For clarity, the attached responses provide the items in the same numbering and format scheme as the appraisal report.

Very truly yours,

R P Crouse /tdm

RPC:JH:nlf
Attachments A, B, C, D

cc: DB-1 NRC Resident Inspector
NRR Project Manager

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Appendix A

Confirmation of Action Letter

Item 1a

Licensee shall provide a schedule for installation and calibration of upgraded seismic monitoring system.

Response

This was previously submitted by Toledo Edison letter of March 22, 1982, (Serial No. 1-254).

Item 1b

Operations crew personnel (licensed operators) shall be retrained relevant to implementation of SP 1105.17.

Response

Toledo Edison will complete this item before startup from the current refueling outage.

Item 1c

Documented guidance and training provided for operating crew (licensed operators) to cope with loss of vital DC power. Include provisions for Shift Supervisor to classify in accordance with Emergency Plan.

Response

Toledo Edison will complete this item before startup from the current refueling outage.

Item 1d

Emergency Action Levels (EAL's) shall be developed for main steam line radiation monitors (N-16) for events in Table 4-1 of the Emergency Plan. Training provided to appropriate radiation assessment personnel.

Response

Toledo Edison will complete this item before startup from the current refueling outage.

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Appendix B

Preparedness Improvement Items

The items in this Appendix are those your staff identified should be considered for improvement.

Item 1

The individual who will be in charge of emergency operations when the Operations Director is unavailable should be identified.

Response

Revision 4 of the Davis-Besse Emergency Plan to be submitted within 90 days of the date of your appraisal report will identify the responsible person.

Item 2

Personnel call-out list should be prioritized to assure expertise required in Table B-1 of NUREG 0654 can be identified.

Response

Revision 4 of the Davis-Besse Emergency Plan will include a revision of Administrative Memo No. 37, identifying personnel meeting Table B-1 functions.

Item 3

Off-hours shift augmentation drills should be conducted to evaluate whether the call-out system can meet the goals of Table B-1. These drills should be conducted quarterly, documented, and used to identify and correct deficiencies.

Response

Toledo Edison will schedule two drills per year to test the call-out system. The response will be evaluated and used to correct deficiencies. The first drill will occur in the fourth quarter, 1982.

Item 4

The Operations Support Center should be equipped with fixed emergency lighting.

Response

Toledo Edison will prepare a Facility Change Request to install eight hour battery pack emergency lighting.

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Item 5

All primary coolant sample lines at the rear of the emergency sample module should be provided with shielding.

Response

A portion of this work is presently scheduled during the current refueling outage. The shielding portion will be completed by January 1, 1983.

Item 6

Table 3 of Emergency Plan Procedure AD 1827.10 should be revised to include Xu/Q values for G stability class.

Response

Completed.

Item 7

A Health Physics Network (HPN) telephone should be installed in the Technical Support Center (TSC).

Response

The request to extend the HPN phone network to the TSC was made to the NRC Telecommunications Branch on March 8, 1982 (TED letter, Serial No. 791).

Item 8

Procedure AB 1203.06, Inadequate Core Cooling Guidelines, should be revised to ensure that Shift Supervisors and Reactor Operators don't omit the need for implementing Emergency Instructions (EI's) in accordance with EP 1202.06.

Response

This recommendation has been forwarded to the Operations Engineer for further consideration.

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Item 9

Existing procedures should indicate where post accident samples are to be stored and disposed of after analysis.

Response

Toledo Edison will revise procedure AD 1850.04 prior to startup from this refueling outage to include this item.

Item 10

Access and egress routes based on projected radiation levels in corridors and hallways should be provided for the sample teams obtaining post-accident samples to ensure ALARA is adhered to.

Response

Toledo Edison will revise procedure AD 1850.04 prior to startup from this refueling outage to include this item.

Item 11

Procedure AD 1850.04 should be upgraded to provide for the transportation and relocation of multi-channel analyzer and GeLi crystal.

Response

Toledo Edison will revise procedure AD 1850.04 prior to startup from this refueling outage to include this item.

Item 12

The Industrial Security Plan Procedure AD 1808.00 should be revised to include specific steps in personnel accountability, how maintained during emergency, and how missing personnel are identified. Cross reference with AD 1827.16 should be included.

Response

Toledo Edison will revise AD 1808.00 to include specific steps for personnel accountability and cross referencing, by September 1, 1982.

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Item 13

The licensee should procedurally specify how the corporate response organization will be mobilized.

Response

Toledo Edison will develop a procedure for inclusion in the Corporate Radiological Emergency Response program prior to the next full scale exercise.

Item 14

A formal training program for the corporate emergency response organization should be established.

Response

Toledo Edison will implement a training program prior to the next full scale exercise.

Item 15

Formal generic training, as well as specific training, should be conducted for offsite agencies in the Emergency Plan and Procedures.

Response

Toledo Edison is presently developing a program for this training. It is expected to begin in January, 1983.

Item 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.

Response

The Nuclear Training and Records Management Departments are presently working on an updated records and retrieval system, which is expected to be functional by July 1, 1982.

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Item 17

The use of the classroom style training session should be continued in addition to any pre-recorded audio-visual program that is established to ensure program accuracy, allow for a more in-depth specialized curriculum, and encourage student/instructor interaction.

Response

The current program includes classroom training as well as pre-recorded audio-visuals, and will be maintained.

Item 18

A method to test the students' understanding of emergency training course material should be provided.

Response

Emergency Planning will work with Nuclear Training to develop such a program.

Item 19

A system to promptly train emergency personnel when significant changes occur in policy, plans, or procedures should be provided.

Response

The Emergency Preparedness Group will develop and implement a system by June 1, 1982.

Item 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 Technical Support Center, Emergency Control Center, and Operations Support Center personnel.

Response

Toledo Edison will develop new emergency personnel monitoring procedures, which will be in use by September 1, 1982.

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Item 21

Those Emergency Implementing Procedures containing directions to contact the Station Superintendent should specifically allow the Shift Supervisor to exercise judgment.

Response

Toledo Edison will review procedures to determine areas where this is considered appropriate.

Item 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.

Response

A review of the coding annunciation will be done by the Technical Section by July 1, 1982.

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Appendix C

Emergency Preparedness Evaluation Report

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

- The Plan does not specify how minimum shift staffing requirements, as per Table B-1 of NUREG 0654, will be established.

Response

Revision 4 of the Davis-Besse Emergency Plan will specify how minimum shift staffing requirements will be met.

- 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.

Response

This item is addressed in Appendix B, Preparedness Improvement Items, Item 2.

- In Figure 5-3 of the Plan (Onsite Emergency Organization), change the location indicated for the Operations Director from Edison Plaza to the Emergency Control Center.

Response

The location for the Operations Director will be changed from the Edison Plaza to the Davis-Besse Administration Building.

- 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.

Response

Revision 4 of the Davis-Besse Emergency Plan will be revised to identify that the Shift Supervisor receives support and advice from the Plant Operations Manager and Operations Engineer.

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

- 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.

Response

Guidance on expected arrival and available Federal resources will be included in Revision 4 of the Davis-Besse Emergency Plan.

- The Plan does not specify who is likely to be sent by Corporate Management to the local Emergency Operations Center (EOC), and indicate who has the responsibility for assuring the person is dispatched to the EOC.

Response

Revision 4 of the Davis-Besse Emergency Plan will identify such a person and the person with responsibility for making the assignment.

PLANNING STANDARD 50.47 (b)(4) (EMERGENCY CLASSIFICATION SYSTEM)

- The Plan does not adequately provide Emergency Action Levels (EAL's), 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.

Response

The wording for this EAL will be changed to reflect a more appropriate time frame.

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 EAL's are acceptable for leak rates over 400 gpm, but should be modified to include lower leak rates.

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Response

EAL's for lower leak rates for this condition will be developed.

ALERT (con't.)

Initiating Condition 8 (loss of DC power). The word "sustained" should be removed from the licensee's EAL.

Response

The wording for this EAL will be changed to reflect a more appropriate time frame.

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).

Response

The EAL will be modified to reflect a lesser leak rate.

SITE EMERGENCY (con't.)

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.

Response

The EAL's will be modified to express dose rate.

GENERAL EMERGENCY

EAL's have not been calculated for those PWR sequences which could lead to a core melt and likely failure of containment.

Response

EAL's will be developed.

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GENERAL EMERGENCY (con't.)

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

Response

EAL's will be calculated when the Kamen High Range Station Vent System is installed.

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

- 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.

Response

Revision 4 of the Davis-Besse Emergency Plan will include a reference to the section of the County and State Emergency Plans where this information is available. It will also identify that the local authorities issue messages.

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

- 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.

Response

Revision 4 of the Davis-Besse Emergency Plan will describe Toledo Edison's NUREG 0696 facilities.

- The Plan contains no provisions for acquisition of data on hydrological and seismic parameters from offsite sources.

Response

Revision 4 of the Davis-Besse Emergency Plan will address this item.

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

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

Response

Revision 4 of the Davis-Besse Emergency Plan will discuss decontamination capabilities offsite.

- 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".

Response

Revision 4 of the Davis-Besse Emergency Plan will include these items.

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

- 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.

Response

Action levels will be developed and included in the Plan and will address removal of radioiodine contamination.

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

- 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.

Response

Revision 4 of the Davis-Besse Emergency Plan will include this requirement.

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

- The Plan does not specify training for individuals responsible for emergency planning effort, such as the Emergency Planning & Preparedness Supervisor.

Response

This will be included in Revision 4 of the Davis-Besse Emergency Plan.

- There is no provision for an independent review of the emergency preparedness program every 12 months, as per 10 CFR 50.54(t).

Response

The provision for independent review every 12 months will be included in Revision 4 of the Davis-Besse Emergency Plan.

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Appendix D

Preparedness Open Items

Item 1

Permanent Technical Support Center is an open item pending approval by the NRC Division of Emergency Preparedness.

Response

No licensee response required.

Item 2

Permanent Emergency Control Center is an open item pending approval by the NRC Division of Emergency Preparedness.

Response

No licensee response required.

Item 3

High range 10^8 rad/hr. containment dome monitors shall be installed in accordance with NUREG 0737.

Response

High radiation dome monitors are being installed to meet the guidance of NUREG 0737, as identified in Toledo Edison's letter of January 25, 1982 (Serial No. 773).

Item 4

Seismic monitoring capability shall be upgraded, procedures written, and training provided in accordance with SP 1105.17.

Response

See Toledo Edison's letter of March 22, 1982 (Serial No. 1-254).

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Item 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.

Response

Toledo Edison will complete training to Auxiliary and Equipment Operators by the next full-scale exercise.

Item 6

Permanent Containment Air Monitoring System shall be installed in accordance with NUREG 0737. Procedures for system use and training on equipment and procedures will be completed.

Response

The Containment Air Monitoring System is being replaced at Davis-Besse during the current outage. Procedures and training for its use will be completed for its operation. However, to insure sample analysis capability for the full range of NRC source terms, a grab sample system is being provided.

Item 7

Installation, testing and development of procedures covering sampling and analysis using the Kamen Primary Coolant High Range Sampling System must be completed.

Response

Modified primary coolant sample station will be installed by the end of 1982, as per Toledo Edison's letter of February 19, 1982 (Serial No. 779). Procedures and training will be done prior to system operation.

Item 8

Installation, testing and development of procedures covering sampling and analysis using Kamen Station Vent System must be completed.

Response

As per Toledo Edison's letter of February 19, 1982 (Serial No. 779), the Kamen Station Vent System will be installed prior to the end of 1982. Procedures covering sampling and analysis will be in place for its initial operation.