

May 4, 1982

Docket No. 50-263

Northern States Power Company  
ATTN: Mr. Dennis E. Gilberts  
Senior Vice President  
Power Supply  
414 Nicollet Mall  
Minneapolis, MN 55401

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 March 15-25, 1982, the NRC conducted a special appraisal of the emergency preparedness program at the Monticello Nuclear Generating Plant. This appraisal was performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. Areas examined during this appraisal are described in the enclosed report (50-263/82-05). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

No significant deficiencies, deviations or noncompliances were identified as a result of this appraisal.

The findings of this appraisal indicate that there are areas for improvement in your emergency preparedness program. These are discussed in Appendix A, "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 "Monticello Emergency Plan" and "Corporate Emergency Plan." These are discussed in Appendix B, "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 C. These will be examined by our staff upon complete implementation of the area involved. Please notify our office relevant to your completion schedule of these items for re-examination by our staff.

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendices A and B may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty days of the date of this letter, describing the results of your consideration of each of the items in Appendix A. 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 B, 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).

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 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 and the enclosures 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.

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

Sincerely,

Original signed by  
James G. Keppler  
James G. Keppler  
Regional Administrator

Enclosures:

- 1. Appendix A, Preparedness Improvement Items
- 2. Appendix B, Emergency Preparedness Evaluation Report
- 3. Appendix C, Open Items
- 4. Inspection Report No. 50-263/82-05(DEPOS)

cc w/encls:

W. A. Shamba, Plant Manager  
 DMB/Document Control Desk (RIDS)  
 Resident Inspector, RIII Monticello  
 Resident Inspector, RIII Prairie Island  
 John W. Ferman, Ph.D., Nuclear Engineer, MPCA

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## Appendix A

### Preparedness Improvement Items

Based on the results of the NRC's appraisal of the Monticello Nuclear Plant Emergency Preparedness Program conducted March 15-25, 1982, the following items should be considered for improvement:

1. Professional training courses should be provided for corporate and site Emergency Planning Coordinators. (Section 1.0)
2. The Letter of Agreement for Bechtel Power Corporation should be changed to include more specific terminology regarding responsibilities. (Section 2.2)
3. Onshift radiation technicians should be trained on all changes to Emergency Plan Implementing Procedures (EPIPs) covering radiation protection and radiological surveillance activities within 30 days of issuance. (Section 3.2)
4. The number of qualified persons available on shift for dose assessment calculations on both the computer and hand calculational methods should be expanded. (Section 3.2)
5. The training program for Site Superintendents/Shift Supervisors should be upgraded to include a direct interface with the dose assessment personnel to ensure that those personnel are familiar with both the format of population dose projections and the application thereof. (Section 3.2)
6. First aid supplies, shock blankets, and Stokes stretchers should be located on each of the five floors of the reactor building. (Section 4.1.2.2)
7. Adequate communications should be provided for Expanded Support Facilities. (Section 4.1.3)
8. The licensee should establish a joint nearsite press briefing area for use in emergency situations by State, local and licensee media personnel. (Section 4.1.4)
9. A shock blanket and splints should be included with the medical supplies in the vicinity of the control room. (Section 4.2.1.1)
10. The licensee should provide at least one enclosed vehicle with four wheel drive dedicated for emergency response functions. (Section 4.2.6)

11. The EPIPs should clearly state that the emergency organization will promptly notify all appropriate individuals and agencies that the emergency has been terminated, recovery actions will be initiated, and define any planned changes in the organizational structure. (Section 5.4.6)
12. The Letters of Agreement should be updated and reviewed for content by July 1982. (Section 6.1.5)
13. A Letter of Agreement should be issued either directly with the Monticello Fire Department or as a part of the City of Monticello Letter of Agreement. (Section 6.1.5)
14. Emergency preparedness information should be distributed to those areas serving the transient population particularly parks, campsites, nearsite motels and hotels, and nearsite municipal buildings (i.e., Big Lake City Hall). (Section 6.2)
15. A dedicated telephone line from the plant's EOF and TSC should be installed to the Wright County EOC.

Appendix B

EMERGENCY PREPAREDNESS EVALUATION REPORT

The following is a list of significant deficiencies identified in the Monticello Site and Corporate Emergency Plans. These deficiencies are categorized as per the planning standards of 10 CFR 50.47(b). These deficiencies must be corrected in accordance with the provisions of 10 CFR 50.54(s)(2):

Planning Standard(b)(1) (Assignment of Responsibility) (263/82-05-01)  
Organization Control

. The plan does not specify the individual in each organization responsible for assuring continuity of resources.

Planning Standard(b)(2) (Onsite Emergency Organization) (263/82-05-02)

. Minimum shift staffing and shift augmentation capabilities listed in the plan are not as per Table B-1 of NUREG-0654. Time intervals (i.e., goals) to achieve additional staffing requirements are greater than those specified in Table B-1. The Plan should indicate the minimum shift staffing that will be implemented after July 1982 or other approved Commission date which will meet the requirements of 10 CFR 50.47(b)(2).

. The Plan does not describe the shift augmentation system (duty officer, tone alert radios, drills, etc.) used to ensure the goals of Table B-1 can be met.

. The local services support and TSC functions are not indicated in the block diagram of the site plan.

. Agreement letters do not delineate authorities, responsibilities, and/or limits on actions of the contractors, private organizations, and local service support groups.

Planning Standard(b)(3) (Emergency Response Support and Resources) (263/82-05-03)

. Expected Federal resources are not listed, and specific sites and times of arrival are not given. Support facilities for the Federal response are not described.

Planning Standard(b)(4) (Emergency Classification System) (263/82-05-04)

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

ALERTInitiating Condition

Reactor coolant leak greater than 50 GPM

Modification or Comment

Specify containment dome monitor reading for this leak rate inside containment.

SITE AREAInitiating Condition

Degraded core with possible loss of coolable geometry.

Modification or Comment

Specify those indicators which would be used to determine this emergency.

Known LOCA greater than makeup pump capacity.

Specify containment dome monitor reading for this leak rate inside containment.

Toxic gases into vital areas where lack of access to the area constitutes a safety problem.

Give toxic gas values (TLV or greater) for those common gases which would present a safety problem at the facility (i.e., chlorine, ammonia).

General EmergencyInitiating Condition

Loss of 2 of 3 fission product barriers with a potential loss of third barrier.

Modification or Comment

Give specific reactor/containment parameter values which will indicate this event (i.e., containment pressure, temperature, suppression pool level/temperature, containment radiation level from the dome monitor, containment isolation status, etc.).

Planning Standard(b)(7) (Public Education and Information) (263/82-05-05)

Sections 7.2 and 5.1.2 of the corporate plan address public education and information criteria, but the site plan does not reference the corporate plan as satisfying this criterion.

- . Section 4.2.2 of the corporate plan does not provide documentation of a basis for timely exchange of information among spokespersons for the responding agencies or for coordinated arrangements for dealing with rumors.
- . Section 7.1 of the corporate plan addresses training of news media personnel, but the annual information program for the news media is not documented in sufficient detail.

Planning Standard(b)(8) (Emergency Facilities and Equipment) (263/82-05-06)

- . Specific EOF facility equipment descriptions ( instrumentation, data system equipment, and power supplies), structure, habitability, staffing, training, size, radiological monitoring, technical data, records, and management are not sufficiently described in the plan. The Northern States Power Company has plans to construct an EOF in accordance to NUREG-0696, but these are not generally described in the plan.
- . There is insufficient information available in the plan to determine whether timely activation and staffing of the EOF, TSC, and offsite support group is possible. The EOF shall be activated within one hour.
- . The plan fails to address provisions for acquiring data from, or having emergency access to, offsite geophysical (e.g., seismic) instrumentation in case of a failure of onsite equipment.
- . Correct Section 7.5 of the Emergency Plan to indicate the Cold Chemistry Lab is now part of the OSC and that the medical supplies that were contained therein are now contained in the OSC.
- . There is no specified method for measuring precipitation or ambient moisture.
- . Table 7.8 of the Emergency Plan does not list the medical kits in the site superintendent's office.
- . The provision for replacing emergency kits that are being calibrated is not addressed in the plan.
- . Expanded Support Facilities should be identified in the Emergency Plan.



Planning Standard(b)(9) (Accident Assessment) (263/82-05-07)

- . Criteria 2, 3, 4, 6, 7, 8, 9 and 10 of NUREG-0654 are not satisfied due to lack of supporting documentation in the plan. The licensee has indicated that a plan does exist which would satisfy the above criteria; however, that document is not provided for in the plan.
- . The plan does not indicate meteorological capabilities as per Appendix 2 of NUREG-0654. The data transmission links between emergency facilities are not specifically addressed in the plan.

Planning Standard(b)(10) (Protective Response) (263/82-05-08)

- . The means for notification of onsite personnel is available; however, the time estimates for notification of onsite personnel and the time required for onsite accountability have not been specified.
- . Evacuation time estimates for the public in the plume exposure EPZ as per NUREG-0654, Appendix 4, are not specified nor is there a description in the plan relevant to the use of these time estimates.

Planning Standard(b)(11) (Radiological Exposure Control) (263/82-05-09)

- . There is insufficient information in the plan regarding decontamination of wounds, instruments, and supplies and for waste disposal.
- . Decontamination of the skin, with respect to radioiodine, is not addressed in the plan.

Planning Standard(b)(13) (Recovery and Reentry (263/82-05-10)  
(Planning and Post-Accident Operations)

- . Criteria 1, 2, 3 and 4 of NUREG-0654 are not satisfied. The plan indicates that the recovery plan has been written, but it has not been submitted for evaluation by the NRC.

Planning Standard(b)(14) (Exercises and Drills) (263/82-05-10)

- . The plan must specify that exercises and drills will be flexible enough to allow for some degree of free-play for decision making.
- . There are no specifics regarding incorporation of observer and participant comments into emergency plan procedural changes. There are no specifics regarding management control of comments to ensure that corecorrective actions are implemented as required by Appendix E.

Planning Standard(b)(16) (Responsibility for Planning Effort: Development, Periodic Review and Distribution of Emergency Plans (263/82-05-11))

- . No specific individual by title has been specified as the Emergency Planning Coordinator.
- . The cross-reference of the emergency plan and the NUREG-0654 criteria has not been provided.
- . The findings of the independent annual audit as per 10 CFR 50.54(t) must be forwarded to the Federal, State and local organizations.
- . The provision for updating telephone numbers in emergency procedures at least quarterly has not been provided.

## Appendix C

### OPEN ITEMS

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

1. Letters dated December 10, 1981, and February 5, 1982, regarding Minimum Shift Staffing, SROs and an addition to the Control Room were sent to the Office of Nuclear Reactor Regulation (NRR), requesting an extension to February 1983. At the time of this appraisal, NRR is evaluating this as a generic issue. (Sections 2.2 and 4.1.1.1) (263/82-05-12)
2. Completion of the permanent Technical Support Center is required. (Section 4.1.1.2) (263/82-05-13)
3. Completion of the permanent Emergency Operations Facility is required. (Section 4.1.1.4) (263/82-05-14)
4. The licensee has committed to NRR by letter dated December 29, 1981, their permanent post-accident coolant sampling system will be installed and fully operational by August 1, 1982. (Section 4.1.1.5) (263/82-05-15)
5. The licensee has committed to NRR by letter dated December 29, 1981, that their permanent post-accident containment air sampling system will be installed and fully operational by August 1, 1982. (Section 4.1.1.6) (263/82-05-16)
6. Procedures for the permanent primary coolant sampling system have not been completed. (Section 5.4.2.5) (263/82-05-17)
7. Procedures for the permanent containment air sampling system have not been completed. (Section 5.4.2.6) (263/82-05-18)
8. The meteorological measurements readout is currently installed in the Site Superintendent's office. A request from the licensee has been sent to NRR to include the Site Superintendent's office as part of the Control Room. This is an open item. (Section 4.2.1.4) (263/82-05-19)