50-334/81-27

APR 2 8 1982

Docket No. 50-334

Duquesne Light Company
ATTN: Mr. J. J. Carey
Vice President
435 Sixth Avenue
Pittsburgh, Pennsylvania 15219

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 a special appraisal at each operating power reactor site. The appraisals are 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 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 October 4-16, 1981, the NRC conducted an appraisal of the emergency preparedness program for Unit 1 of the Beaver Valley Power Station. Areas examined during this appraisal are described in the enclosed report (50-334/81-27). 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."

Significant findings for which you have made acceptable commitments to resolve were discussed in the confirmatory action letter dated November 2, 1981, a copy of which is enclosed for your convenience. These findings are described in further detail as items 1, 2, 3, 4, 5, 6, 7, 9, 10 and 11 of Appendix A. It is our understanding based upon your letter of January 5, 1982, that corrective actions on these items have been completed.

Other areas needing improvement are discussed in Appendix B, "Preparedness Improvement Items".

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HQ concurrence received 4/15/82 via D. Matthews

IE 35

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 and Section 8 of the report 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. Not withstanding this, you are requested to submit a written statement within thirty (30) days of the date of this letter, describing the corrective actions taken or planned for 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) actions which have been taken, (2) actions 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 10 CFR 50.54(q).

This is to inform you that if the remaining Appendix A item (No. 8) is not corrected within 120 days from the date of this letter, 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 witheld 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, the report will be placed in the Public Document Room. The telephone notification of your intent to request withholding should be made to the Supervisior, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

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The reporting requirements contained in this letter affect fewer than ten (10) persons and are, therefore, not subject to the Office of Management and Budget clearances as required by 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 Richard Van Niel, Emergency Preparedness Licensing Branch at (301) 492-4535.

Sincerely,

Original Signed By:
Gary Snyder
for George H. Smith
Director, Division of
Emergency Preparedness
and Operational Support

Enclosures:
1. Appendix A, Significant Findings
2. Appendix B, Preparedness Improvement Items
3. Appendix C, Emergency Preparedness Evaluation Report
4. Letter to Duquesne Light Company, dated November 2, 1981.
5. NRC Region I Inspection Report No. 50-334/81-27

cc w/encls:
F. Bissert, Manager, Nuclear Support Services
R. Washabaugh, QA Manager
H. P. Williams, Station Superintendent
W. S. Lacey, Chief Engineer
R. Martin, Nuclear Engineer
J. Sieber, Manager, Nuclear Safety and Licensing
T. Jones, Manager, Nuclear Operations
R. M. Mafrice, Nuclear Engineer
N. R. Tonet, Manager, Nuclear Engineering
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
Commonwealth of Pennsylvania
NRC Resident Inspector
J. W. Brucker, Regional Director, FEMA Region III

bcc w/encl:
Region I Docket Room (with concurrences)
Chief, Operational Support Section (w/o encls)

RI:DEPOS	RI:DEPOS	RI:OPRP	RI:DEPOS
Brocker/gwc	Snyder	Staroszecki	Smith
4/19/82	4/23/82	4/27/82	4/23/82

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APPENDIX A

SIGNIFICANT APPRAISAL FINDINGS

Based on the results of the NRC's appraisal of the Beaver Valley Power Station Emergency Preparedness Program, conducted October 4-16, 1981, the following improvements are required: (References are to the sections in NRC Inspection Report No. 50-334/81-27.)

1. Implementation of current proposals in the emergency plans and procedures which call for transferring emergency functions from the control room/ECC to the other emergency response facilities, so as to allow control room personnel to concentrate on plant operations and corrective actions. (Section 2.1)

2. Completion of plans to ensure that the required minimum number of personnel are available on shift by July 1, 1982. (Section 2.1)

3. Implementation of revisions to plans and procedures which call for prompt staffing of the interim Emergency Operations Facility (EOF) to perform the emergency functions of NUREG-0696. (Section 2.2)

4. Improvements in the ability to promptly augment the emergency organization in the functional areas called for by NUREG-0654, Table B-1 (Section 2.2).

5. Development of approved lesson plans covering specialized areas of emergency preparedness training. (Section 3.1)

6. Completion of specific training intended for licensee personnel having assigned emergency duties and responsibilities and for offsite supporting organizations. (Section 3.2)

7. Completion of necessary preparations to make the interim Emergency Operations Facility operational and capable of performing the emergency functions of NUREG-0654 and NUREG-0696. (Section 4.1.1.4)

8. Provision of appropriate facilities and supplies to enable decontamination of onsite personnel during emergencies. (Section 4.1.2.3)

9. Improvement of notification procedures/facilities to enable completion of initial notifications within 15 minutes of an emergency declaration. (Section 5.4.1)

10. Identification of techniques to be incorporated into the dose calculational procedures to compensate for the potential uncertainty associated with plume trajectories in order to provide reasonable assurance that adequate protective measures (scope and area) can be recommended in the event of a radiological emergency condition. (Section 5.4.2).

11. Revision of decontamination/monitoring procedures used during an accident to include action levels for decontamination and assessment, procedural guidance for determining individual dose equivalent and data sheets necessary to maintain proper records. (Section 5.4.3.4 and 4.1.2)

APPENDIX B

PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Beaver Valley Power Station Emergency Preparedness Program conducted October 4-16, 1981, the following matters should be considered for improvement: (References are to the sections in NRC Inspection Report No. 50-334/81-27).

1. Specification of qualifications and training required for individuals who would be assigned to the functional areas of the emergency organization. (Section 2.1)

2. Specification of working level emergency personnel who would respond to augment the onsite emergency organization in station callout procedures. (Section 2.1)

3. Clarification of EPP/IPs to specify reporting locations, responsibilities and limitations of non-licensee personnel who would augment the licensee's emergency organization. (Section 2.2)

4. Provisions for training emergency response personnel in changes to procedures and equipment occurring in the periods between annual training cycles. (Section 3.1)

5. Provisions for management controls to assure that individuals complete assigned emergency preparedness training assignments. (Section 3.2)

6. Relocation of the post-accident gas, particulate, and noble gas effluent air sampling systems to an adequately shielded location. (Section 4.1.1.7)

7. Improvement in wind measurement from the 35 ft. level of the primary meterological tower. (Section 4.2.1.4)

8. Identification of appropriate adjustments to available data from the primary meterological system for use in dose projections. (Section 4.2.1.4)

9. Identification of four-wheel drive vehicles which would be available for use by emergency teams during winter months and other periods of severe weather. (Section 4.2.6)

10. Revisions to EPP/IPs so that "procedure" sections list sequential action steps, reference interrelated tasks, and include appropriate supplies of data and signoff sheets. (Section 5.1)

11. Inclusion of onsite radiation protection concerns as part of the EPP/IPs. (Section 5.3)

12. Inclusion of the authority of the Emergency Director within Implementing Instructions. (Section 5.3)

13. Modification of initial notification procedures EPP/IP 1.1 to call for additional direct notifications of Ohio and West Virgina following declaration of a General Emergency. (Section 5.4.1)

14. Designation of specific onshift individuals in the EPP/IPs (other than the Emergency Director) who will be tasked and trained to make emergency notifications. (Section 5.4.1)

15. Modification of Post-Accident Stack Effluent Sampling Procedure to provide warning on anticipated dose rates during accident conditions. (Section 5.4.2.8)

16. Development and implementation of precautions and prerequisites for taking high activity liquid effluent samples. (Section 5.4.2.10)

17. Relocation of equipment used to refill SCBA air bottles to an area of the plant which would be readily accessable during accident conditions. (Section 5.4.3.1)

18. Provision for reporting the status of personnel accountability performed at Beaver Valley Unit II to the Unit I emergency organizations. (Section 5.4.3.3)

19. Development of specific access Control Standards for identifying personnel authorized to enter the interim TSC or EOF areas. (Section 5.4.4)

20. Location of security personnel at the TSC/EOF to ensure meaningful information flow and workload tasking to the security organization during emergencies. (Section 5.4.4)

21. Development of Specific Access Control Standards to enable identification of essential licensee and non-licensee augmentation personnel who must respond onsite. (Section 5.4.4)

22. Modification of Radcon Emergency Operation Procedure 2.1, to place the conditions for requiring self-contained breathing apparatus in BOLD FACE TYPE or some other technique to highlight their importance. (Section 5.4.5)

23. Modification of the emergency plan and procedures to call for testing communications links at the frequency specified in Section N.2.a of NUREG-0654. (Section 5.5.2)

24. Development of a procedure outlining the administrative controls for tracking drills and exercises and for ensuring that the actions necessary to respond to observations are implemented. (Section 5.5.2)

25. Modification of emergency planning audit/review procedures to ensure that comprehensive independent reviews are performed at least every twelve months. (Section 5.5.4)

26. Equipping emergency survey kits with casters or dolleys to aid in safe movement from storage locations. (Sections 7.2.8)

APPENDIX C

EMERGENCY PREPAREDNESS EVALUATION REPORT

BY THE

DIVISION OF EMERGENCY PREPAREDNESS
OFFICE OF INSPECTION AND ENFORCEMENT
U. S. NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

BEAVER VALLEY POWER STATION
UNIT 1
DOCKET NO. 50-334

NOVEMBER 1981

INTRODUCTION

The Duquesne Light Company herinafter referred to as the licensee) filed with the Nuclear Regulatory Commission Revision 3 the Veaver Valley Power Station Emergency Plan dated December 29, 1980.

The plan was reviewed against the 16 planning standards in Section 50.47 of 10 CFR Part 50, the requirements of Appendix E to 10 CFR Part 50, and the criteria of NUREG-0654/FEMA-REP-1, Revision 1 entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants'" November 1980.

This evaluation report follows the format of Part II of NUREG-0654 in that each of the Planning Standards is listed and followed by a summary of the applicable portions of the plan and the deficiencies that relate to the specific standard. The final section of this report provides our conclusions.

A separate report will be issued describing the findings and determinations of the Federal Emergency Management Agency of the State and locatl response plan.

EVALUATION

A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATION CONTROL)

Planning Standard

Primary reponsibilities for emergency response by the nuclear facility licensee, and by State and local organizations with the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Emergency Plan

- The Beaver Valley Power Station Emergency Plan identifies those State, local, and Federal response organizations which have response roles in the event of an accident. Since the plume exposure and ingestion Emergency Planning Zones incorporate portions of Pennsylvania, Ohio, and West Virginia, three State county emergency response agencies have primary response roles; Pennsylvania Emergency Management Agency (PEMA), Ohio Disaster Services Agency (ODSA), and West Virginia Office of Emergency Services (WVOES). Similarily, the Beaver County Emergency Management Agency, Columbiana County Disaster Services Agency, and the Hancock County Emergency Services Agency serve as the lead county response agencies.

- A concept of operations and its relationship to the total effort is specified. The interrelationships are illustrated in Figure 5.4 of the onsite emergency plan.

- The Emergency Director is identified as the person who will assure overall direction and control of the Duquesne Light emergency response.

- Twenty-four hour per day emergency response, including manning of communications links is provided.

- Written agreements from Federal, State, and local agencies and other support organizations having an emergency response role within the EPZs are included in this plan. The plan describes the role of each of the agencies with which there are agreements and is relationship to the role of the plant.

- The plan describes a corporate level support organization which would be responsible for assuring continuity of resources for protracted 24-hour operations.

B. ONSITE EMERGENCY ORGANIZATION

Planning Standard

On-shift facility licensee reponsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various response activities and offsite support and response activities are specified.

Emergency Plan

- The onsite emergency organization of plant personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement are specified. Plant staff emergency assignments for managers and key coordinators are described.

- The on-shift supervisor is designated as the Emergency Director and has the authority to initiate emergency actions and recommend protective measures to offsite officials until relieved of Emergency Director duties by a designated senior management official (Station Superintendent, Chief Engineer, or Maintenance Supervisor). The responsibilities, lines of succession and functions which cannot be delegated are also described.

- Table 5.1 specifies the positions or title and major tasks to be performed by the persons to be assigned to the functional areas of emergency activity. The plan indicates the staffing levels which can be augmented within 60-120 minutes.

- The interfaces between and among the onsite functional areas of emergency activity and the offsite emergency organization made up of corporate support, local services support, and State and local government response organizations are specified. A block diagram is provided in Figure 5.4 of the plan.

- The corporate management, administrative, and technical support personnel who will augment the plant staff are generally specified for those functional areas of emergency response except those performed in the Emergency Operations Facility (EOF).

- The contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency response organization are specified.

- The services to be provided by local agencies for handling emergencies, including police, ambulance, medical hospital, and fire-fighting organizations are specified. Copies of letters of agreement with these organizations as well as letters of agreement with Westinghouse Electric Corporation (the NMSS supplier) Teledyne Isotopes and INPO are appended to the plan.

Deficiencies

1. The plan should describe how working level personnel will augment the BVPS emergency organization in the areas of Table B-1 to NUREG-0654. Furthermore, the plan should provide a commitment that the minimum staffing requirements including the times for augmentation from offsite personnel will be as specified in Table B-1 of NUREG-0654, Rev. 1 by July 1, 1982.

2. The plan should describe augmentation plans to allow the Emergency Operations Facility to be staffed so as to perform the emergency functions of NUREG-0654, Table B-1 and NUREG-0696.

C. EMERGENCY RESPONSE SUPPORT AND RESPONSES

Planning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

Emergency Plan

- The roles and types of support expected to be provided by Federal Assistance Organizations is described in the plan, including activation of the Federal Radiological Monitoring and Assessment Plan.

- Arrangements have been made for the license to dispatch representatives to key governmental emergency operations centers and facilities will be available for governmental representatives at the EOF.

- Nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance, including medical and radiation management capabilities, are identified. Letters of agreement are appended.

Deficiencies

1. The plan should specify persons by title who are authorized to request Federal assistance.

D. PLANNING STANDARD

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Emergency Plan

- The licensee has established an emergency classification and emergency action level scheme compatible with the scheme set forth in Appendix 1, NUREG-0654, Rev. 1.

- Specific instruments, parameters or equipment status for each emergency class is established in the emergency procedures or in the plan.

- Postulated accidents (Section 14 of the FSAR) and the example initiating conditions in Appendix 1, NUREG-0654, Rev. 1 are covered in Section 4 of the plan.

E. NOTIFICATION METHODS AND PROCEDURES

Planning Standard

Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and followup messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

Emergency Plan

- Procedures which describe mutally agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme, including means for confirmation, are established.

- Procedures for alerting, notifying, and mobilizing emergency response personnel are established, including means of notifying onsite staff and off-shift personnel as needed for minimum emergency staffing levels.

- The contents of the initial and followup emergency message to be sent from the plan are established.

- Methods and procedures for notifying the public of an emergency at BVPS have been established using a combination of fixed sirens and transmission line signaling devices. These devices would activated by county officials. The Federal Emergency Management Agency (FEMA) will determine the adequacy of the offsite emergency notification system.

- The Public Information Department emergency procedures contain guidance for messages intended for the public.

Deficiencies

1. The plan describes notification procedures for key emergency coordinators. The plan should also provide a description of the system and procedures to be used to notify and mobilize working level personnel who perform the emergency functions described in NUREG-0654, Table B-1.

F. EMERGENCY COMMUNICATION

Planning Standard

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Emergency Plan

- Primary and backup means of communication for operators, local, and State response organizations are provided by hotlines, commercial telephone, and radio systems.

- The Emergency Director and the Communicator are established as providing communications from the plant.

- o Twenty-four hour notification to the activation of the State/local emergency response network are provided.

- o Communications with contiguous State/local governments within the EPZ are provided.

- o Communications with Federal emergency response organizations are provided.

- o Communications between the nuclear facility Control Room, the Emergency Control Center, State and local EOCs and monitoring teams are addressed.

- o Means to alert or activate emergency personnel are provided.

- o Communications by the licensee with NRC headquarters, the NRC Regional Office, and the Emergency Control Center are addressed.

- o A telephone link between the plant and the hospital, and a radio link between the hospital and the ambulance are provided.

- o Routine tests of the communication links between the Control Room Emergency Control Center and the States and three county warning points and EOCs are specified. Tests of the communication links with the NRC are specified.

Deficiencies

1. The frequency of communications tests with the States and three counties within the EPZ should be at least monthly instead of quarterly.

G. PUBLIC EDUCATION AND INFORMATION

Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency

(including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

Emergency Plan

c Annual dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency is to be prepared and disseminated on an annual basis, beginning in the fall of 1981. The initial brochure is to contain the appropriate information.

o Advertisements containing useful emergency information which can be placed in the phone book will be prepared.

o The Manager, Public Information Department, will provide a point of contact for the news media emergency conditions. The position of Emergency News Center Director is provided to manage the Emergency News Center and act as official company spokesperson for events classed higher than an Alert. A near-site Emergency News Center will be set up at the Willows Motel about 3 miles from the site.

o The Public Information Department will maintain a representative at the TSC and EOF to ensure that proper information is provided for public release.

o The Consumer Services Department will be staffed and prepared to deal with rumors which may develop during an emergency.

o Programs will be conducted on an annual basis by Duquesne Light Company to acquaint news media personnel with the emergency plans, information concerning radiation and points of contact for release of public information in an emergency.

H. EMERGENCY FACILITIES AND EQUPMENT

Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Emergency Plan:

- The licensee has established an interim Technical Support Center, Emergency Control Center, Recovery Center, and an Operations Support (Assembly) Center.

- Onsite and offsite monitoring and analysis systems and equipment have been established and are identified in the plan.

- Routine inspection, inventory, calibration, and maintenance of emergency equipment and identification of emergency kits are addressed as well as the location for receipt and analysis of field monitoring data and coordination of sample media.

Deficiencies:

1. The plan should provide a commitment and schedule for the permanent Emergency Response Facilities in accordance with NUREG-0696.

2. The plan should be modified to provide for the interim Emergency Operations Facility (EOF) to perform the functions of (a) overall licensee accident management, (b) radiological/environmental assessment, and (c) protective action recommendations.

I ACCIDENT ASSESSMENT

Planning Standard

Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

Emergency Plan

- The plan identifies plant system and effluent parameters characteristic of a spectrum of off-normal conditions and accidents, however, specific values and setpoints are not included in the plan.

- Onsite capability and resources are provided for initial and continuing assessment during an accident including instrumentation for detection of inadequate core cooling, in-plant iodine instrumentation, and postaccident sampling capability.

- The plan describes the methodology for determining the source term, magnitude of releases, and the relationship between effluent monitor readings and projected offsite doses.

- Provisions have been made for determining release rates and projected doses in the event that the plant vent monitor is offscale and inoperable, based on FSAR accident analysis source terms and field measurements.

- Resources are provided for prompt field monitoring within the environs including field detection and monitoring of radioiodine concentrations as low as 10^{-7} uCi/cc.

Deficiencies

1. Specific parameter and instrument setpoints which correspond to accident class initiating conditions should be specified in the plan.

2. The plan should explicitly identify the means for relating various measured parameters in the field to dose rates for the key isotopes listed in Table 3 of NUREG-0654.

J. PROTECTIVE RESPONSE

Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Emergency Plan

- The licensee has established the means to warn, advise, account for, radiologically monitor and evacuate onsite personnel.

- Individuals remaining onsite will be furnished with protective clothing, respiratory equipment and issued radioprotective drugs if necessary.

- The plan identifies the mechanism for promptly recommending protective actions to appropriate State and local authorities, and provides time estimates for evacuation within plume exposure EPZ.

- The plan describes sampling procedures for liquid and gaseous radiological release.

- The basis for choice of recommendation of protective actions from the plume exposure pathway are included in the plan.

Deficiencies

1. The plan should contain maps with preselected monitoring and sampling points around the facility.

K. RADIOLOGICAL EXPOSURE CONTROL

Planning Standard

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

Emergency Plan

- The licensee has established onsite exposure guidelines consistent with EPA standards, has provided an onsite radiation protection program and identified individuals by position who can authorize exposures in excess of 10 CFR 20 limits.

- The plan provides for 24-hour a day capability to determine the radiation dose received by emergency workers; distribution of dosimeters and maintenance of dose records; decontamination of personnel, supplies, instruments and equpment and onsite contamination control.

Deficiencies

1. The plan should address the use of decontaminants to be used in the event of radioiodine contamination of the skin.

2. The plan should specify the criteria for returning contaminated items and areas to normal use.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

Emergency Plan

- Arrangements have been made with a local and backup hospital for the treatment of individuals involved in a radiological accident.

- Onsite first aid capability is provided, including an individual onsite at all times who is trained in first aid techniques.

- Arrangements have been made for the transportation of victims of radiological accidents to the medical support facilities.

M. RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

Planning Standard

General plans for recovery and reentry are developed.

Emergency Plan

- General plans and procedures for reentry and recovery have been developed, and the means by which decisions are made to relax protective measures are addressed.

- The Recovery Manager will be the senior manager of the recovery organization. The title, authority, and responsibilities for maintaining contact with State and local governments and keeping them apprised of plant and radiological conditions through the recovery oprations.

- A method for periodically estimating total population exposure has been established.

N. EXERCISES AND DRILLS

Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills and deficiencies identified as a result of exercises or drills are (will be) corrected.

Emergency Plan

- An emergency preparedness exercise will be conducted as set forth in the NRC Rule.

- A joint exercise involving the mobilization of Pennsylvania, Ohio, and West Virginia agencies, as well as county and local personnel and resources is provided.

- The scenarios of the exercises will be varied from year to year such that all major elements of the emergency response plan and its procedures are evaluated every five years. Additionally, exercises will be scheduled so as to be conducted at differing times of day.

- The plan provides for a critique of the annual exercise by Federal, State, and local officials.

- Quarterly fire drills will be conducted.

- Annual medical emergency drills will be conducted.

- Annual radiological monitoring drills will be conducted.

- Semiannual health physicals drills involving airborne and liquid samples and direct radiation measurements in the environment will be conducted, and annual health physics drills involving analysis of in-plant liquid samples with simulated elevated radiation levels will be conducted.

- o The scenarios to be used in the exercises and drills will include: (1) basic objectives of the exercise or drill including evaluation criteria; (2) data, time period, and participating agencies; (3) events to be simulated; (4) approximate time schedule of real and simulated events; (5) a narrative summary description of the conduct and organization exercise or drill; and (6) arrangements made for qualified observers, and evaluation criteria.

- o Provisions are made for a critique following each drill or exercise.

- o An Emergency Plan corrective action report will be entered into the stations computerized commitment control system to track followup actions to exercise deficiencies.

Deficiencies

1. Communications with the NRC and States and countries within the plume EPZ shall be tested monthly in accordance with paragraph E.9.d of Appendix E to 10 CFR 50; communications with the Federal response organizations and States within the ingestion pathway should be tested quarterly.

O. RADIOLGOICAL EMERGENCY RESPONSE TRAINING

Emergency Plan

- o The plan provides for the initial training and retraining of company and offsite personnel who will respond to an accident or emergency in the functional areas of emergency response.

- o Training will include classroom as well as practical drills to ensure that personnel are cognizant of and acquainted with their duties and responsibilities.

- o Licensee sponsored traiing will be conducted for police, fire, medical, and rescue organizations which may be called upon to respond to an emergency.

Deficiencies

1. The plan should address the training provided for those personnel responsible for the transmission of emergency information and instructions (see Table B-1, NUREG-0654, "Notification/Communication").

2. Training should be established for personnel performing key functions in the Emergency Operations facility.

P. RESPONSIBILITY FOR THE PLANNING EFFORT

Planning Standard

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

Emergency Plan

- The Supervisor, Emergency Preparedness, will receive periodic training on emergency planning matters and regulations.

- Updated plans will take into account changes identified in drills and exercises and be certified on an annual basis to be current.

- Controlled copies shall be used to keep the emergency organization cognizant of changes to the Plan and the Emergency Procedures Document.

- A listing of the procedures required to implement the plan and the section of the plan to be implemented by each is provided as part of the emergency plan.

- An audit of the emergency preparedness program is performed by the Offsite Review Committee biannually. The Onsite Safety Committee performs annual reviews of the BVPS Emergency Plan.

- The updating of telephone numbers in the Emergency Procedures Document will be verified on a quarterly basis.

Deficiencies

1. The plan should contain a detailed listing of all supporting plans and their source.

CONCLUSION

Based on our review, we conclude that the Beaver Valley Power Station Emergency Plan, upon satisfactory correction of the previously identified deficiencies, will meet the planning standards set forth in NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.

The NRC evaluation on the overall state of emergency preparedness for the Beaver Valley site will be made following review of the findings and determinations made by FEMA on the State and local emergency response plans, and the review of the joint exercise held to demonstrate the capability to implement the onsite and offsite plans.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

NOV 2 1981

Docket No. 50-334

Duquesne Light Company
ATTN: Mr. J. J. Carey
Vice President
Nuclear Division
Post Office Box 4
Shippingport, Pennsylvania 15077

Gentlemen:

This letter refers to a meeting between Mr. J. J. Carey, Vice President and members of his staff, and Mr. S. H. Chesnut, Team Leader, and other members of the NRC Emergency Preparedness Implementation Appraisal Team, which was held at the Beaver Valley Power Station on October 15, 1981, and to a telephone conversation Mr. Kenneth Grada of your staff and Mr. G. L. Snyder of my staff on October 28, 1981. With regard to the matters relating to emergency preparedness discussed at that meeting, we understand that you will undertake and complete the following actions:

1. Revise the emergency organization, the BVPS Emergency Plan and implementing procedures to provide for performing required emergency functions at your Emergency Operations Facility (EOF). Specifically, the EOF staff should be responsible for performing the functions of (a) overall management of your emergency response, (b) radiological/environmental assessment and (c) offsite protective action recommendations.

   These actions will be completed by December 1, 1981, with the exception that the performance of the function of radiological/environmental assessment from the EOF will be implemented by December 31, 1981.

2. Pursuant to the requirements of the generic letter dated February 18, 1981 to all licensees from Mr. D. Eisenhut, NRR, regarding the minimum staffing requirements for nuclear power plant emergencies, a study shall be performed to determine how the augmentation of the onshift staff can be achieved within the 30 and 60 minute goals of NUREG 0654, Table B-1 after the declaration of an emergency. The results of this study will be documented and forwarded to the NRC for review and evaluation along with a description of compensatory measures for any augmentation goals not met.

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The results of the study will be made available no later than December 31, 1981.

3. Complete implementation of the planned emergency preparedness training program. Specifically, complete the preparation of lesson plans and conduct the specialized emergency training outlined in the BVPS Emergency Plan for your personnel and offsite support organizations.

   The portions of this training program designed for your Emergency Directors, Emergency Recovery Managers, Dose Projection Coordinators, and Shift Communications Coordinators will be completed by December 1, 1981. The remainder of the required training will be completed by February 15, 1982.

4. Identify techniques which can compensate for uncertainty associated with plume trajectories in the BVPS environs and incorporate them into the dose calculation methodology. Additionally, training in this methodology shall be completed for all shift personnel who would be responsible for making dose assessments.

   This will be accomplished by December 1, 1981.

5. Finalize plans for and make operational your interim Emergency Operations Facility, including communications equipment, decisional aids and reference materials. These plans should also include provisions to reduce the potential for congestion in the Control Room/Emergency Coordination Center area by performing non-plant mitigation/operation functions in the Technical Support Center and EOF.

   The interim Emergency Operation Facility will be made functional no later than December 1, 1981 with the exception of the dose assessment facilities which will be operational no later than December 31, 1981.

6. Revise the notification procedures to provide for prompt notification of your offshift emergency response organization and offsite agencies. Individuals on each shift shall be trained in the use of the revised procedures and any equipment changes.

   These revisions and actions will be implemented no later than December 31, 1981.

In addition to the above actions, please inform this office in writing, when the aforementioned actions have been completed.

If our understanding of your planned actions described above is not in accordance with your actual plans and actions being implemented, please contact this office by telephone (215) 337-5000, within 24 hours.

Your cooperation with us on this matter is appreciated.

Sincerely,

Ronald C. Haynes
Director

cc:
F. Bissert, Manager, Nuclear Support Services
R. Washabaugh, QA Manager
H. P. Williams, Station Superintendent
W. S. Lacey, Chief Engineer
R. Martin, Nuclear Engineer
K. Grada, Superintendent of Licensing
J. Sieber, Manager, Nuclear Safety and Licensing
T. D. Jones, Manager, Nuclear Operations
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Public Document Room (PDR)
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