YELLOW

JAN 11 1982

Docket Nos. 50-324 and 325

Carolina Power and Light Company
Attn: Mr. J. A. Jones
Senior Executive Vice President
and Chief Operating Officer
411 Fayetteville Street
Raleigh, N. C. 27602

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 each power reactor site. These appraisals are being performed in lieu of certain routine inspections normally conducted in the area of emergency preparedness. The objectives 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 October 13 - 22, 1981, the NRC conducted a special appraisal of the emergency preparedness program at the Brunswick Steam Electric Plant. Areas examined during this appraisal are described in the enclosed report 50-324, 325/81-26. 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 deficiencies exist in your emergency preparedness program. These are discussed in Appendix A, "Emergency Preparedness Deficiencies". You have made acceptable commitments to resolve these deficiencies as discussed in Appendix A. If the deficiencies are not corrected by the committed dates, you are reminded that enforcement action will be considered.

This emergency preparedness appraisal also indicates that there are areas that should be evaluated and considered for improvement in your emergency preparedness program. These areas are discussed in Appendix B, "Preparedness Improvement Items".

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 your corrective action 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) 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.

In conjunction with this appraisal, the emergency plan for your facility was reviewed to insure compliance with applicable regulations. The results of this review, included as Appendix C, indicate that certain areas of your plan do not contain sufficient information to demonstrate compliance with the planning standards of 10CFR50.47(b). Changes to the emergency plan to correct these areas are to be provided to this office and the Office of Nuclear Reactor Regulation within 30 days of the date of such change in accordance with 10CFR50.54(q). All identified emergency plan deficiencies are to be corrected within 120 days of the date of this letter.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures will be placed in the NRC's Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1).

The responses directed by this letter and the enclosures 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 appraisal, we will be pleased to discuss them with you.

Sincerely,

/S/

James P. O'Reilly
Regional Administrator

Enclosures:
1. Appendix A, Emergency Preparedness Deficiencies
2. Appendix B, Preparedness Improvement Items
3. Appendix C, Emergency Plan Deficiencies
4. Office of Inspection and Enforcement
   Inspection Report No. 50-324, 325/81-26

cc w/encl:
C. R. Dietz, Plant General Manager

JAN 1 1 1982

bcc w/encl:
NRC Resident Inspector
Document Management Branch
State of North Carolina
Emergency Preparedness Licensing Branch, IE:HQ

RII	RII	RII	IE:HQ	RII	RII
CRMacFarland:ejw	GRJenkins	CJulian	FPagano	JPStohr	~~RBMartin~~
1/8/82	1/8/82	1/8/82	1/8/82	1/11/82	~~1/ /82~~

S.P. Stohr for Watters

APPENDIX A
EMERGENCY PREPAREDNESS DEFICIENCIES

Based on the results of the NRC's appraisal of the Brunswick Steam Electric Plant Emergency Preparedness Program conducted October 13 - 22, 1981, the following deficiencies were identified: (References are to Sections in OIE Report No. 50-324, 325/81-26 and the applicable standard of 10 CFR 50.47).

1. Emergency Plan Training/Retraining Program (Section 3.0; 50.47 (b) (15)).

   An adequate training and retraining program had not been established and implemented for all emergency response personnel and general employees.

2. Dose Assessment (Section 7.2; 50.47(b) (9)).

   Capability to perform initial offsite dose projection/assessment in the event of an emergency was not adequate.

During the appraisal exit meeting, October 22, 1981, and by subsequent telephone conversation with Mr. G. R. Jenkins of this office on October 28, 1981, the licensee committed to resolve the above deficiencies as follows:

The Emergency Plan training/retraining program will be defined by December 23, 1981 and will be fully implemented by April 1, 1982.

The procedure for performing initial offsite dose projection/assessment will be upgraded by November 6, 1981. Retraining on this procedure for appropriate personnel will be completed, including drills/walk-throughs, by January 30, 1982.

These commitments are considered acceptable. The aforementioned areas will be reviewed during a future inspection.

APPENDIX B
PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's appraisal of the Brunswick Steam Electric Plant Emergency Preparedness Program conducted October 13 - 22, 1981, the following items should be considered for improvement: (References are to Sections in OIE Report No. 50-324, 325/81-26).

1. Revising the Corporate Emergency Plan to be compatible with Revision 2 of the Emergency Plan pertaining to the augmented emergency response organization (2.2).

2. Ensuring that the ENS telephone extensions in the TSC are operable (4.1.1.2).

3. Providing procedures to allow personnel traveling from the TSC to the Control Room to do so in a timely manner (4.1.1.2).

4. Adding shielding and installing HEPA and charcoal filters in the ventilation system for the TSC (4.1.1.2).

5. Specifying areas or rooms in the Service Building which are to be used for OSC purposes (4.1.1.3).

6. Establishing a backup OSC (onsite or near site) (4.1.1.3).

7. Ensuring that the ENS telephone in the EOF is operable (4.1.1.4).

8. Storing radiological equipment, decontamination supplies and emergency protective supplies in the EOF (4.1.1.4).

9. Improving the EOF habitability to meet NUREG-0696 criteria (4.1.1.4).

10. Shielding of lines leading to the sample hood which are likely to contain high concentrations of radioactivity during an emergency, in order to maintain radiation exposures as low as reasonably achievable (4.1.1.5).

11. Ensuring that provisions are made such that a containment air sample can be taken under a full range of accident conditions. Shielding and/or modifications should be made such that radiation doses received by the personnel taking the samples are ALARA. In addition, consideration should be given to the handling and analysis of particulate and iodine samples from the drywell continuous air monitor (4.1.1.6).

12. Establishing a mechanism (monitoring device or administrative control) to permit postaccident collection of particulate filters and charcoal/silver zeolite cartridges from the stack and Turbine Building vents prior to the accumulation of activity levels which are difficult, if not impossible, to quantify via gamma spectroscopy (4.1.1.7).

13. Reviewing the need for special sampling equipment and sample station shielding to determine whether any improvements are needed in present liquid radwaste/effluent sampling capability (4.1.1.8).

14. Providing copies of decontamination procedures for the decontamination kits at the TSC and Visitor's Center (4.1.2.3).

15. Designating the necessary number of Emergency Environmental Monitoring Teams and providing a complete emergency kit for each team (4.2.1.1).

16. Providing respiratory protection and protective clothing for each Emergency Environmental Monitoring Team (4.2.1.1).

17. Maintaining a copy of the emergency kit inventory in each kit as required by PEP 4.2 (4.2.1.1).

18. Making provisions for obtaining a backup source of representative meteorological information which should reflect access to real-time information with specific procedures for obtaining and utilizing the information and for routine checks of communication (4.2.1.4).

19. Providing for severe weather information to be available to the Control Room 24 hours per day (4.2.1.4).

20. Upgrading/improving the PEP dose assessment procedures (5.4.2).

21. Improving PEP-3.5.1 to address the use of silver zeolite cartridges in taking air samples and to identify the specific instrumentation to be used by the teams and the storage locations (5.4.2.1).

22. Referencing the RC&T procedures to be used for in-plant surveys in PEP-3.3.1 and PEP-3.3.2 (5.4.2.3).

23. Identifying the relationship between PEP-3.3.3 and RC&T-1500 in each procedure (e.g., cross-referenced) (5.4.2.4).

24. Adding precautionary notes and other appropriate conditions to Procedure RC&T-1500 relative to sample preparation and handling for chloride and boron analyses (5.4.2.5).

25. Revising procedure RC&T-0150 to recognize that post-accident particulate and radioiodine samples from containment may contain significant quantities of radioactivity such that they present a handling problem (5.4.2.6).

26. Making provisions for greater sample-to-detector distances (as much beyond 10 cm as possible), for counting high level charcoal/silver zeolite cartridges and particulate filters via gamma spectroscopy (5.4.2.7).

27. Establishing a procedure for post-accident collection of particulate filters and charcoal/silver zeolite cartridges from the stack (5.4.2.8).

28. Providing for informing personnel of recommended evacuation routes from plant areas in emergency conditions (5.4.3.2).

29. Specifying the assembly areas for a site evacuation in PEP-3.8.1 (5.4.3.2).

30. Making agreements for medical assistance with more than one general practitioner (5.4.3.5).

31. Improving information procedures to identify information liaison with State and Federal organizations (5.4.7).

32. Improving provisions for rumor control (5.4.7).

33. Reviewing procedure RC&T-0600 to express more clearly the limits in Section 2.1 and the limits referenced in Section 8.6. Reviewing the appendices of RC&T-0600 to ensure that the information is current (5.5.1).

34. Preselecting personnel for the Reentry Teams prior to an emergency (5.5.1).

35. Developing a program to implement the commitment for drills and exercises (5.5.2).

36. Documenting corrective actions resulting from drills and exercises (5.5.2).

37. Revising PEP-4.5 to clarify that updated dissemination of information to the public is accomplished annually as specified in the Plan (6.2).

38. Revising information procedures to identify a program for familiarization of the news media (6.3).

APPENDIX C
EMERGENCY PLAN DEFICIENCIES

Based on the results of the NRC's review of the Brunswick Steam Electric Plant Radiological Emergency Plan (Revision 2), the following deficiencies have been identified: (References in parentheses are to criteria of NUREG-0654, Rev. 1).

1. (B-5) The minimum staffing requirements identified in Table B-1 of NUREG-0654 should be satisfied. The staffing identified in the Plan and clarified by your letter dated June 9, 1981, is deficient in augmented staffing and should be upgraded to provide for augmentation of on-shift staffing within the time limits and in those functional areas identified in Table B-1.

2. (D.1, D.2) The emergency classification and emergency action level scheme set forth in the Plant Emergency Procedures should clearly identify the specific instruments, parameter values, and equipment status.