UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Report No. 50-261/82-29

Licensee: Carolina Power & Light Company
411 Fayetteville Street
Raleigh, NC 27602

Facility Name: H. B. Robinson

Docket No. 50-261

License No. DPR-23

Inspection at H. B. Robinson site near Hartsville, South Carolina

Inspector: G. A. Hoffman for
W. E. Cline

9/15/82
Date Signed

Approved by: G. R. Jenkins
G. R. Jenkins, Section Chief, EPPS Branch
Emergency Preparedness Section
EPOS Division

9/16/82
Date Signed

SUMMARY

Inspection on August 16-19, 1982

Areas Inspected

This routine, unannounced inspection involved 32 inspector-hours on site in the area of radiological emergency preparedness.

Results

In the area inspected, no violations or deviations were identified.

DETAILS

1. Persons Contacted

Licensee Employees

*R. Starkey, Plant General Manager
S. Zimmerman, Manager Technical Administration
*R. Connally, Assistant to Plant General Manager
R. Black, Director Emergency Preparedness
C. Bethe, Training Supervisor
*D. Gainey, Senior Specialist - Emergency Preparedness
*R. Godwin, Senior Specialist - Emergency Preparedness
J. Allen, Shift Supervisor
*F. Gilman, Regulatory Compliance Specialist
*H. Cox, Regulatory Compliance Specialist
H. McManus, Training Specialist

Other licensee employees contacted included technicians, and office personnel.

Other Organizations

G. Wise, Director, South Carolina Emergency Preparedness Division (EPD)
L. Mimms, Director, Darlington County EPD
S. Finklea, Program Manager, South Carolina Bureau of Radiological Health
W. McSwain, Planner, South Carolina EPD

NRC Resident Inspector

*S. Weise, Senior Resident Inspector

*Attended exit interview

2. Exit Interview

The inspection scope and findings were summarized on August 19, 1982, with those persons indicated in paragraph 1 above.

3. Licensee Action on Previous Enforcement Matters

(Closed) Deficiency (50-261/82-02-04): Implement an adequate emergency training program. The inspector determined that the licensee had developed and implemented an emergency preparedness training program, and verified the corrective action stated in the licensee letter to NRC dated April 30, 1982 (Details, paragraph 7b).

(Closed) Deficiency (50-261/82-02-22): Develop adequate methods for prompt notification of offsite authorities. The inspector determined that a procedure had been developed and implemented concerning prompt notification

of offsite authorities. The inspector also verified the corrective action as stated in licensee letter to NRC dated April 30, 1982. (Details, paragraph 15).

(Closed) Violation (50-261/82-02-39): Failure to meet frequency requirements for in-plant radiological drills and communications drills. The inspector determined that drills are now being conducted at the proper frequency and a system is in place to ensure drills are conducted at the proper frequency. The inspector also verified that the action described in the licensee letter to NRC dated April 15, 1982 had been taken. (Details, paragraph 20).

The inspector reviewed licensee action on items specified in the Confirmation of Action Letter dated March 31, 1981.

The licensee's action on the emergency preparedness improvement items identified during the emergency preparedness appraisal and the licensee actions and commitments documented in CP&L letter to NRC Region II dated April 15, 1982 were also reviewed. The status of these items is discussed in the details of this report.

4. Unresolved Items

Unresolved items were not identified during this inspection.

5. Administration of the Emergency Preparedness Program

The licensee has an emergency preparedness staff at the Corporate level and an Emergency Preparedness Coordinator and an Emergency Preparedness Specialist at the plant level. The inspector discussed professional development training for emergency preparedness personnel with licensee representatives. Records pertaining to training courses attended by emergency preparedness personnel were reviewed. These records showed that plant emergency preparedness personnel has attended seminars and special courses in emergency planning. The inspector also reviewed a licensee memo from the Plant Emergency Preparedness Coordinator which established the plant policy in professional development training. The inspector noted that the policy statement prescribed the type training considered appropriate for emergency preparedness planning personnel. However, the policy statement appeared non-committal on frequency of participation in such training. The inspector expressed concern about a firm commitment concerning continued support for professional development training for emergency preparedness personnel. This concern was expressed to plant management representatives. The previously identified improvement item in this area (50-261/82-02-01) remains open pending the licensees continued support and commitment to professional development training for emergency preparedness personnel.

6. Emergency Organization

A review of the licensee emergency organization was conducted. The review involved discussion with licensee representatives, review of selected

emergency procedures, and a review of the emergency plan. The inspector verified by review of selected training records and by discussion with licensee representatives that members of the emergency organization were aware of their assignment and roles/responsibilities. The inspector discussed the previous improvement item in this area (50-261/82-02-02) concerning assignments to key positions in the emergency organization. It was noted that Appendix A to the Plant Emergency Procedures had been revised to include the individual titles/position along with designated alternates for the emergency organization positions of: Accident Assessment Team Leader, Damage Control Team Leader, Operational Support Center Team Leader, Evacuation Assembly Area Leader, and Representative to the Forward EOC. Based on these findings improvement item 50-261/82-02-02 is closed.

7. Training

a. Program Establishment

The licensee emergency preparedness training program is described in the Corporate Emergency Preparedness Implementing Procedure, CEPIP-19 entitled Emergency Plan Training. It was noted in a review of the procedure that the procedure provided the basis for the training program, specified objectives, and described the scope of the initial and refresher training program for corporate, plant, and non-licensee personnel. Plant procedure PEP 4.3, entitled Performance of Training, Exercise, and Drills had been revised to include specification of training responsibilities. The inspector noted that lesson plans had been developed and reviewed selected lesson plans. The inspector had no comments on the lesson plans. The licensee has also established a self paced study program. The program consists of a study guide and selected references applicable to the study area. A written examination must be satisfactorily completed in order to complete the self study course.

The licensee has formally established a general employee training and retraining program. Details of this program and program responsibilities are provided in TI-300 Revision 7, dated May 27, 1982. The general employee retraining focuses on emergency alarms and signals, emergency assembly areas, security areas, radiaiton protection, and fire protection. The inspector discussed program implementation and methods for scheduling retraining with licensee representatives. The licensee has established a tracking system for ensuring participation in the program. The system involves tying access badging to successful completion of training and periodic training status reporting by supervisory personnel. Based on these findings the previously identified improvement item in this area (50-261/82-02-03) is closed.

b. Program Implementation

The inspector verified by examination of selected licensee records and by discussion with licensee representatives that the training program had been implemented. According to licensee records personnel to be

trained have been identified, responsibility for delivery of training has been assigned, and methods for testing and documenting training have been implemented. The inspector reviewed selected training records as a means of determining the extent of training program implementation. The records showed that key members of the emergency organization to include those individuals who would be expected to hold the position of Site Emergency Coordinator, Plant Operation Director, Emergency Repair Director, Logistics Support Director, and Radiological Control Director had received training. These records showed that these individuals had completed the course work required by the plant and corporate procedures. The records also showed that the individuals had successfully completed testing requirements and had participated in a table top exercise. A further review of licensee training records showed that training had been given to the following groups: TSC Staff, Plant Monitoring Team, Environmental Monitoring Team, Personnel Protection and Decontamination Team, and EOF Staff. Training for Dose Projection Teams and Fire Brigade Members were planned for implementation within the next two weeks according to a licensee representative. Based on the above findings actions taken by the licensee in this area appear to be consistent with statements and representations made in the CP&L letter to NRC Region II dated April 30, 1982 concerning the February 22, 1982 Confirmation of Action Letter. Based on these findings the previously identified deficiency in this area (50-261/82-02-04) is closed.

The inspector also reviewed licensee training materials and records related to respiratory protection training, training of offsite agency personnel such as ambulance squad and hospital personnel. The inspector verified from selected licensee records that training had been given on use of repiratory protective equipment. Plant procedure PEP 4.3 requires respiratory protection training for members of accident assessment teams. A licensee representative stated that training of additional personnel in the use of respiratory protective equipment was planned. Based on this finding the previously identified inspector followup item in this area (50-261/81-06-10) is closed.

Licensee training records also revealed that local emergency medical personnel had received training on treatment of radiologically contaminated personnel. The inspector inquired about problems which were noted in the 1981 full scale exercise concerning the failure of emergency personnel to control contamination spread, including the lack of disposable covering material (sheeting). Documentation was made available to the inspector which showed that paper sheeting was made available to hospital and other emergency personnel to be used to prevent the spread of contamination during emergency involving radiological contamination. As a means of controlling the availability and usage of this material the licensee has added the sheeting material along with other emergency supplies to the checklist in procedure PT 43.0 which contains the licensee requirement for periodic inventory of specialized supplies and equipment. A licensee representative indicated that training sessions involving offsite agency emergency

response personnel included discussion on use of disposable covering materials as a means of contamination control. Based on these findings the previously identified inspector followup item in this area (50-261/81-06-20) is closed.

The inspector discussed specialized radiation protection and radiation accident victim handling training needs of the Byerly Hospital staff with licensee representatives. The inspector was shown records which indicated that hospital staff members had participated in such training at the REACTS course at Oak Ridge Tennessee. This specialized training was in addition to training provided by the licensee during October 1981 and May 1982. Based on this finding the previously identified improvement item in this area (50-261/81-06-21) is closed.

8. Emergency Facilities

The inspector reviewed the licensees program for emergency facilities. The review consisted of a tour of facilities, review of licensee emergency procedures and emergency plan, and discussion with licensee representatives.

a. Control Room

A tour was made of the Unit 2 control room. The inspector noted the types of communication devices and location of phones and radio equipment in the control room. Operation of the control room communication equipment was discussed with licensee representatives. The inspector verified that a load dispatcher radio was inplace in the control room and that reference to the radio system was made in the licensee plan. Based on this information the previously identified improvement item (50-261/82-02-05) concerning placement of the load dispatcher phone is closed.

b. TSC

The interim TSC is located in the Service Building which is in the owner controlled area. The interim TSC does not appear to have the same habitability criteria as the control room. The licensee is planning to build a new TSC/EOF complex, at the plant site. According to licensee representatives and licensee planning documents the new TSC/EOF Complex is tentatively scheduled for completion in the fall of 1983. Current licensee plans show that the new complex will apparently meet NUREG 0696 criteria concerning habitability. Based on this information the previously identified improvement item in this area (50-261/82-02-07) remains open pending completion of the new TSC/EOF Complex.

The inspector discussed activation and operation of the TSC with licensee representatives. A new procedure PEP 3.2.4 entitled Activation of the TSC and EOF has been written and implemented by the licensee. The procedure describes who reports to the TSC, shows layout

of the TSC, designates responsibility for setup of the TSC, and describes usage and location of status boards and visual aids. Based on these findings the previously identified improvement item in this area (50-261/82-06) is closed.

c. OSC

The inspector toured the OSC which is located in the Maintenance Building. The inspector noted that specified emergency supplies and equipment, were in storage in the stock room of the maintenance building. Provision for an alternate OSC was discussed with licensee representatives. The licensee has revised section 5.4 of the plan and related emergency procedures relating to notification and communication to require that an announcement be made over the plant PA system concerning alternate duty stations, alternate routes of travel, and special instructions. Any alternate OSC location could be announced over the PA system. The licensee has determined that the Construction Building and the Construction Area Parking Lot could be used as alternate OSC locations. Based on this finding the previously identified improvement item in this area (50-261/82-02-08) is closed.

d. EOF

The interim EOF is currently located in the Administrative Building. The current EOF does not provide ventilation protection as specified in Table 2, NUREG 0654. The licensee is planning to build a permanent TSC/EOF complex onsite which will meet existing NRC criteria (see paragraph 8.b. above). Consequently the previous identified improvement item in this area (50-261/82-02-10) remains open pending completion of the TSC/EOF Complex.

Discussions were held with licensee representatives concerning activities and operation of the EOF. The inspector reviewed a recently developed procedure PEP 3.2.3 dealing with activation and operation of the EOF. The procedure dealt with arrangement of the EOF and responsibilities for setting up and operation of the EOF. Based on these findings the previously identified improvement item in this area (50-261/82-02-09) is closed.

A tour of the EOF was conducted. During the tour, the inspector noted the arrangement and layout of the EOF. The inspector noted that a first aid kit and a clock had been added to the EOF. An inspection of emergency supply items in the EOF showed that air samplers, silver zeolite cartridges and survey meters were present in the EOF. Based on these findings the previously identified improvement items in this area (50-261/82-02-11 and 50-261/82-02-12) are closed.

9. Medical Treatment Facilities

The licensee medical treatment program was evaluated based on a review of licensee procedures and by discussion with licensee representatives. The

inspector inquired about installation of communications equipment in the first aid room (located in the auxiliary building). The inspector was advised that a work order had been issued to install a PA system station in the first aid room. Work is to be completed on this system by October 1, 1982 according to licensee representatives. The previously identified improvement item in this area (50-261/82-02-13) remains open. The procedure for inventory and check of medical supplies and equipment was discussed with licensee representatives. The inspector determined that plant procedure A-11, Guidance on Conducting Inventories and Determining Status of Supplies and Equipment had been revised to provide for monthly inventory of medical supplies and equipment. Based on these findings the previously identified improvement item in this area (50-261/82-02-14) is closed.

10. Decontamination Facilities

The inspector discussed decontamination facilities and procedures with licensee representatives. The inspector inquired about licensee action on the previously identified improvement item (50-261/82-02-15) concerning prepositioning of decontamination kits. A licensee representative indicated that kits were being established and modifications were being made to inventory and inspection procedures to include a status check on the kits. The expected completion date provided by the licensee was September 1, 1982. This matter (50-261/82-02-15) remains open.

11. News Center

The licensee program for staffing and equipping a news media center was reviewed. The licensee's primary news media center is the plant visitor center. The backup news media center is the Center Theater in Hartsville, SC. The inspector discussed communication capabilities of the backup news media center with licensee representatives. The licensee has determined that a PA system is available and operable at the backup location. The previously identified improvement item concerning this matter (50-261/82-02-16) is now closed. The inspector reviewed licensee documentation concerning the telephone expansion capability at the backup news media center. The licensee determined that several phones are available, but decided that the number available may not be sufficient in a large emergency. The licensee is currently discussing an arrangement with the telephone company to provide additional phone service, on a short notice. Based on these findings the previously identified improvement item in this area (50-261/82-02-17) is closed.

The problem noted during the 1981 full scale exercise concerning habitability and evacuation of the news media center was reviewed and discussed with licensee representatives. As noted above the licensee has established the Center Theater in Hartsville, SC as the alternate news media center. In the event an evacuation of the primary center (Visitor Center) was necessary, evacuees would go to the Center Theater. According to licensee representatives any evacuation from the site would be performed in accordance with PEP 3.8.1 entitled Evacuation. The news center Director is responsible for ensuring evacuation of personnel assigned to the center.

According to the latest revision of the emergency plan a line of communication exists between the plant news media center and the emergency response manager. This communication link should allow the news center Director to get prompt information concerning plant status and radiological conditions. Based on these findings the previously identified inspector followup item in this area (50-261/81-06-23) is closed.

12. Emergency Assessment Equipment

The inspector discussed emergency kits with licensee representatives and reviewed selected procedures governing kit usage, placement, and inventory. The licensee has revised plant surveillance procedure, PT 43, to include a listing of essential equipment on emergency kit inventory sheets. The inspector noted that PT 43.0 required monthly inventory of emergency equipment, and PT 43.1 requires quarterly inventory of environmental emergency equipment. A review of selected inventory records showed that the licensee had conducted inventories in accordance with established procedures. Based on these findings the previously identified improvement items in this area (50-261/82-02-18) is closed.

The inspector discussed the previously identified improvement item (50-261/82-02-19) concerning listing of emergency communication equipment on kit inventories. The inspector noted in a review of inventory records that the only communications equipment listed were megaphones. A licensee representatives stated that megaphones were the only communications devices now kept in emergency kits. The licensee representatives further stated that walkie-talkies and phones had been removed from kits and stored at key storage locations. The previously identified improvement item (50-261/82-02-19) in this area is closed.

13. Emergency Alarms and Communications

a. Alarms

The licensees program for emergency alarms was reviewed. The review consisted of discussion with licensee representatives and review of procedures. The inspector inquired about audibility of alarms in high noise areas. A licensee representatives indicated that an evaluation of this problem area had been completed. According to the licensee representative additional PA systems had been added at the plant to include high noise areas. Licensee records show 168 PA system locations. Licensee procedures require monthly audibility testing of the PA system at all locations. A review of selected test records shows that the system had been tested. The previously identified improvement item in this area (50-261/82-02-20) is closed.

b. Communications

The difficulties encountered in communication of information during the 1981 full scale exercise was discussed with licensee representative and licensee corrective actions were reviewed.

The inspector discussed the matter of confusion resulting from three communication lines open to the State FEOC following activation of the licensee's Recovery Center. According to the licensee evaluation the problem arose as a result of an offsite agency representative forwarding information to the FEOC from the TSC once the Recovery Center was manned. Under current licensee plans, all offsite agency representatives will be in the EOF and communication will take place from the EOF. Offsite agency representatives will only be allowed in the TSC on a case-by-case basis, and will not be allowed to use the TSC as a base for offsite communications. The fact that the licensee has established a near site EOF (instead of a recovery center) and developed procedures for its activation and usage should help alleviate future re-occurrence of this problem. Based on these findings the previously identified inspector followup item in this area (50-261/81-06-03) is closed.

Communication difficulties between the TSC and field monitoring teams as noted in the 1981 full scale exercise were discussed with licensee representatives. The licensee has procured three additional higher power portable radios (walkie-talkies) for use on the environmental surveillance team. The licensee indicated that tests of the radio revealed that they could transmit and receive at distances beyond 10 miles from the plant. The inspector examined the radios, charging units, and storage facilities for the radios. The inspector had no comments. Based on these findings the previously identified inspector followup item in this area (50-261/81-06-04) is closed.

14. Reserve Emergency Equipment and Supplies

The area of reserve emergency equipment and supplies was reviewed by the inspector. The review involved an inspection of the licensee documentation and a tour of the licensees supply room. The licensee controls the stockage level of emergency supplies and equipment via an inventory control system known as the max/min system. Under this system the licensee identifies the quantity of a reserve supply item or material needed and this becomes the minimum authorized stockage level for this commodity within the max/min system. When stockage levels drop to the minimum established level additional materials are procured. A licensee representative indicated that all necessary emergency supply items were listed on the max/min system. A review of selected listings on the max/min system revealed that emergency supply items were listed. Based on these findings the previously identified improvement item in this area (50-261/82-02-21) is closed.

15. Notification System

The inspector reviewed the licensee program for notification of offsite agencies in the event of an accident situation. The inspector determined from review of licensee records and by discussion with licensee representatives that a meeting was held with government representatives from the State of South Carolina for the purpose of reaching agreement on methods of notification and notification times. The licensee and State representatives

agreed that the licensee would provide for t notification of the responsible State government agency within 60 minutes for an unusual event type accident classification, and 15 minutes notification for accident situations classified as either an Alert, Site Emergency, or General Emergency. The inspector verified that the licensee had revised plant procedures PEP 2.2, 2.3, 2.4, and 2.5 concerning notification of offsite agencies. The changes to the procedure were consistent with the statements and representations made by the licensee on this matter in a letter to NRC Region II, dated April 30, 1982. A review of selected licensee training records showed that licensee emergency response personnel have received training on the revised notification procedures. Based on these findings, the previous emergency preparedness deficiency in this area (50-261/82-02-22) is closed.

The inspector also discussed the public notification system with licensee representatives and a representative from the South Carolina Emergency Preparedness Division (EPD). In particular, the inspector discussed EBS message preparation with these representatives. The EPD representative indicated that the State Radiological Plan is in the process of being revised to include standard emergency messages including messages suitable for EBS use. The EPD representative stated that the revised plan will likely be issued by early October 1982. The inspector also discussed dedicated phone systems between the plant and local and state agencies. Ring-down phones currently exist between the plant and local government agencies, and between the plant and EPD. The inspector inquired about the status of dedicated phones between the plant and the State of South Carolina Bureau of Radiological Health. Licensee representatives indicated this matter had been discussed with the State but that it was deemed impractical since the State Radiological Health Offices are not manned on a 24-hour per day basis. Based on these findings the previously identified improvement item in this area (50-261/82-02-23) is closed.

During a tour of the TSC the inspector noted that communications equipment to include a radio base station which connects the plant with the State of South Carolina EPD was in place. Procedures on use of the radio were also in place in the TSC. Licensee logbooks showed that the radio system had been checked on a monthly basis. A review of selected training records showed that certain emergency response personnel had been trained in radio protocol and radio base station operating procedures. Based on these findings the previously identified improvement item in this area (50-261/82-02-24) is closed.

The inspector inquired about usage of standard emergency meassages between the utility and State and local government agencies. The inspector noted during a review of PEP's 2.2 through 2.5 that the emergency message was not the standard message which the State of South Carolina, State of North Carolina and other utilities (CP&L - Brunswick, Duke Power, and South Carolina Gas and Electric) had agreed upon for use during emergencies. The inspector discussed the merits of such a standard message. A licensee management representative indicated that consideration would be given to using the standard message. This matter remains open (50-261/82-29-01) and will be reviewed during a subsequent inspection.

16. Radiological Surveys

The licensees program for radiological surveys during emergency conditions was reviewed. The areas evaluated included offsite radiological surveys, onsite (out-of-plant) radiological surveys, and inplant radiological surveys. The inspector reviewed plant procedures PEP 3.3.1 and 3.5.1 as relates to offsite surveys. The inspector noted that PEP 3.5.1 had been revised to include data sheets that contained essential information about the type of survey e.g. names of individuals performing the surveys, type and serial number of instrument used, air sampler flowrate, and background radiation level. Based on these findings the previously identified improvement item in this area (50-261/82-02-25) is closed. The inspector also noted that plant procedures PEP 3.5.1 and 3.3.1 have been revised to show disposition of data sheets following completion of the survey. Based on this finding the previously identified improvement item in this area (50-261/82-02-26) is closed.

The area of onsite (out-of-plant) surveys was reviewed by interviews with licensee personnel and review of PEP 3.3.1 and 3.3.2. The previously identified improvement item in this area (50-261/82-02-27) concerning detailed instructions for onsite (out-of-plant) surveys was discussed. The licensee has elected to revise the existing procedures in this area, PEP 3.3.2, so as to cross-reference the instructions in PEP 3.3.1 concerning conduct of surveys. Based on this finding item 50-261/82-02-27 is closed. The inspector noted that the licensee had made additional changes to PEP 3.3.2. The changes include making provisions for labeling of samples, provisions for disposition of data sheets and specifying primary and backup communications systems. Based on these findings the previously identified improvement item in this area (50-261/82-02-28) is closed.

The inspector discussed the area of in-plant radiological surveys with licensee representatives and reviewed applicable procedures. The inspector noted that PEP 3.3.1 had been revised to incude labeling requirements, and instructions on disposition of data sheets. The revised procedure also provides guidance on the availability and priority of usage of communications systems (e.g. PA, PBX system, and hand-held radios). Based on these findings, the previously identified improvement items in this area (50-261/82-02-29 and 50-261/82-02-30) are closed.

17. Evacuation of Owner Controlled Area.

The inspector reviewed the licensees program for evacuation of owner controlled areas. The inspector reviewed plant procedures 2.3, 2.4 and 2.5 as relates to evacuation instructions. The licensee plans to make an announcement over the PA system following an alarm signal. The announcement will deal with radiological conditions, egress routes, and assembly areas. The licensee plans and procedures reference the principal access and egress routes from the plant as highway 23 and highway 151. A licensee representative stated that the back access road to the CP&L Darlington Steam Plant

could be used for evacuation if necessary. Based on this finding, the previously identified improvement item in this area (50-261/82-02-31) is closed.

The inspector discussed alternate assembly areas with licensee representatives. The licensee considers the construction parking lot and construction building west of the plant as the location of the alternate assembly area. Other alternate locations include the Darlington Raceway and the McBee High School. Based on these findings the previously identified improvement item in this area (50-261/82-02-32) is closed.

18. Personnel Monitoring and Decontamination

The inspector reviewed plant procedures PEP 2.6.6, 2.6.7, and 2.6.4 as relates to personnel monitoring and decontamination. The inspector determined that the licensee is still in the process of developing documentation to record decontamination actions for personnel and vehicles; therefore, the previously identified improvement items in this area (50-261/82-02-33 and 50-261/82-02-35) remain open. The inspector inquired about licensee action on the previously identified improvement item (50-261/82-02-34) concerning disposition of HP Form 28-1 during emergencies. The procedures indicate that survey results and other data are provided to the respective team leaders. Team leaders review the results and report conditions to the next level of management. Based on these findings the previously identified improvement item in this area (50-261/82-02-34) is closed.

19. Public Information/News Media Considerations

A review was made of the licensees program for dissemination of information to the general public. The review consisted of discussions with licensee representatives review of emergency response brochures, and examination of selected licensee records. The inspector inquired about licensee action taken on the previously identified improvement items (50-261/82-02-36, 37 and 38) concerning information dissemination, source of information for the corporate spokeperson, and rumor control. The inspector was advised that corporate communications procedures were being revised to incorporate these items. A licensee representative indicated that work on these procedures should be completed by September 1982. These items remain open pending completion of the procedures.

The inspector reviewed the emergency preparedness brochure prepared for distribution to the general public within the 10 mile EPZ. The brochure was revised in February 1982 and according to licensee representatives was distributed to the general public in March 1982. The brochure discusses the siren system (alerting system) and emergency broadcast messages. The brochures also contains general information about nuclear power and radiation protection principles to include the concepts of sheltering versus evacuation. The licensee has elected not to discuss the KI issue in the brochure. Based on these findings the previously identified improvement items in this area (50-261/81-06-24, 50-261/82-02-45) are closed.

The inspector determined that the licensee has not established a program for dissemination of the brochure to locations used by the transient population. A licensee representative indicated that this program area was still under review. This matter (50-261/82-02-44) remains open pending further action by the licensee.

The inspector inquired about licensee action on the previously identified inspector followup item (50-261/81-6-22) noted in the full scale exercise concerning the lag time between initial and followup news releases. The licensee has evaluated this problem and determined that it was primarily a scenario problem. According to the licensees evaluation, the compressed timing of event sequences contributed to the news function not being able to keep up with changing events. The licensee indicated that in future exercises the impact of the compressed time sequence of events would be considered in scenario development. Based on these findings the previously identified inspector followup item in this area (50-261/81-06-22) is closed.

The inspector inquired as to whether the licensee had established a program to brief the news media annually on emergency preparedness matters. A licensee representative indicated that such a program had been planned; however, a commitment documenting the planned program had not made in either the plant plan or procedures at the time of the inspection. Consequently this matter (50-261/82-02-46) remains open pending further licensee action.

20. Drills and Exercises

Licensee corporate procecure CEPIP #20, Emergency Response Drills and Exercises and licensee plant procedure PEP 4.3, Performance of Training, Exercises and Drills provides guidance on drills and exercises. Section 6.2 of the emergency plan also provides guidance on drills and exercises.

A review of licensee procedures reveals that the licensee has established a program for tracking deficiencies identified during drills and exercises. Administration Instruction, AI-12, identifies the Regulatory Action Item Listing (RAIL) System as the mechanism to be used for tracking open issues to included those identified during drills/exercises. The inspector reviewed a copy of the RAIL system printout for August 1982. The inspector had no further comments. Based on these findings the previously identified improvement item in this area (50-261/82-02-40) is closed.

A review of PEP 4.3 and Section 6.1.2.1 of the plant emergency plan shows that frequency requirements for communications drills are now consistent between these documents. The inspector verified that the frequency requirements are now consistent with the criteria in NUREG 0654. Based on these findings the previously identified improvement item in this area (50-261/82-02-42) is closed.

The inspector discussed the licensee program for incorporating news media coverage of the drills and exercises. A licensee representative indicated that the news media would be included in full scale exercises. The licensee representative stated that no changes had been made to plant procedures,

PEP 4.3 concerning this matter, but did indicate that section 6.1.2 of the emergency plan provided guidance on making information available and coordinating with offsite agencies including the news media concerning exercises. Based on this finding, the previously identified improvement item in this area (50-261/82-02-43) is closed.

Licensee action on the previously identified violation (50-261/82-02-39) concerning failure to meet the frequency requirements for communication drills and in-plant radiological drills was reviewed. A review of licensee drill records showed that an in-plant radiological drill was held on March 26, 1982. The inspector reviewed the scenario, controller message cards, and critique results. The inspector had no further comments. The licensee is planning to hold another in-plant radiological drill during September 1982. The inspector also reviewed licensee records concerning communications drills. The records showed that monthly test of communication systems within the 10 mile EPZ had been conducted during the period of record reviewed (February-July 1982). The records also showed that quarterly communications tests had been conducted with agencies in the 50 mile EPZ. The records reviewed showed that no major discrepancies were noted during the tests. Furthermore, the records showed that during the tests the emergency message forms referenced in procedures, PEP-2.2, -2.3, and -2.5 were used. Hence, the previously identified improvement item in this area (50-261/82-02-41) is closed. The inspector also reviewed licensee action to prevent re-occurrence of the violation. The licensee has a established a "tickler system" as a means of prompting the plant Emergency Preparedness Specialist when a drill is due. This "tickler system" is maintained by the Administrative Service Office and is included in their re-occurring reports/actions listing. The Emergency Preparedness Coordinator and Specialist have established a yearly master schedule of activities which includes drill/test schedules. Based on the above findings the licensee appears to have met the commitments and taken action on the violation (50-261/82-02-39) as stated in the CP&L letter to NRC Region II dated April 15, 1982. This matter is considered closed.

21. Dose Projection Methods

The inspector reviewed the licensee program for dose projection. A review of PEP-3.4.1, -3.4.2, and -3.4.3 which relate to dose projection reveals that the licensee has revised the procedures so as to provide a readable, step-by-step methodology for predicting doses. The licensee has also developed a new procedure, PEP-2.6.20, entitled Dose Projection Coordinator. PEP-2.6.20 provides guidance on control and direction of the dose projection effort once the TSC (or EOF) is activated. Based on these findings the previously identified improvement item in this area (50-261/82-02-47) is closed.