U.S. NUCLEAR REGULATORY COMMISSION OFFICE OF INSPECTION AND ENFORCEMENT

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Report No.	78-20	_		
Docket No.	50-219	_		
License No.	DPR-16	Priority	Category	С
Licensee:	Jersey Cent	ral Power and Light Company		
	Madison Ave	nue at Punch Bowl Road		
	Morristown,	New Jersey 07960		
Facility Nam	ne: Oyster	Creek Station		
Inspection a	t: Forked	River, New Jersey		
Inspection of	conducted:	August 22-24, 1978		
Inspectors:	Dale	E Donaldson	9-11	-78
	D. E. Dona	ldson, Radiation Specialist	date	signed
			date	signed
Approved by:	. P. Stoh	r, Chief, Environmental ial Projects Section	date 9/11/ date	signed 78 signed
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Inspection Summary:

Inspection on July 22-24, 1978 (IE Inspection Report 78-20)

Areas Inspected: Routine, unannounced inspection of emergency planning including: licensee coordination with offsite support agencies; emergency facilities, equipment, instrumentation and supplies specified in the Emergency Plan and Implementing Procedures; training of emergency personnel; Emergency Plan Implementing Procedures; licensee records relating to emergency drills; the licensee's management controls in the area of emergency planning; and licensee action on unresolved items noted in previous emergency planning inspections. The inspection involved 18 hours onsite by one NRC regional based inspector.

Results: Of the seven areas inspected, one item of noncompliance was identified in one area (Infraction-failure to spike and leak test self-reading dosimeters prior to being placed into service).

Region I Form 12 (Rev. April 77)

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DETAILS

1. Persons Contacted

a. Principal Licensee Employees

*Mr. J. Carroll, Station Superintendent *Mr. E. Scalsky, Supervisor, Radiation Protection *Mr. S. Fuller, Assistant Quality Assurance Supervisor *Mr. L. Smialek, Health Physicist *Mr. D. Ross, Manager, Nuclear Generation

The inspector also interviewed eight other licensee employees during the course of the inspection. They included individuals assigned to the licensee's emergency organization.

* denotes those present at the exit interview.

b. Other Personnel

Mr. T. Darmody, Chief, Lacey Township Police Department

Mr. J. DeFilippo, Administrator, Community Memorial Hospital

Ms. M. Simpson, Lacey Township First Aid Squad

Mr. J. Vann, New Jersey Bureau of Radiation Protection

2. Licensee Action on Previous Inspection Findings

(Closed) Unresolved Item (76-29-05) Coordination with the a. State of New Jersey. Since this item was first discussed in IE Inspection Report 76-29, the New Jersey State radiation emergency response plan, the New Jersey PIPAG, received Federal concurrence. In the process, officials of the New Jersey Bureau of Radiation Protection and licensee representatives met several times to discuss coordination activities and clarify their understandings of one another's responsibilities and actions. In addition, both the State of New Jersey and the licensee participated in coordinated drills to test and evaluate the interface of their respective plans. Discussion with New Jersey Bureau of Radiation Protection and licensee personnel indicated that planning activities are being discussed on a fairly routine basis at least two times per year. Mutual discussions over the past several months have resulted in the resolution of all previously noted problem areas.

- b. (Closed) Unresolved Item (76-29-06) Availability and operability of the Alternate Emergency Coordination Center (AECC). The licensee has completed a review of the availability and stockage of equipment in the AECC. This review resulted in the short range addition of equipment to the AECC located in the Lacey Township Municipal Building and longer range plans to relocate the AECC to the Energy Spectrum at the Forked River site.
- (Closed) Unresolved Item (76-29-07) Scope of Quality Assurance C. Audit requirements pertaining to the emergency plan. Audits of emergency planning activities are now required to be conducted once every two years per a recent amendment to the licensee's technical specifications. The inspector reviewed a report of an audit of the emergency planning program conducted in November 1977 and held discussions with a responsible individual in the licensee's QA organization. This review indicated that audits of emergency planning activities involve verification of compliance with the various conditions and requirements of the emergency plan and implementing procedures relating to: coordination with offsite agencies; emergency facilities and equipment; emergency plan training; review and revision of the emergency plan and implementing procedures; and the conduct of drills.
- d. (Closed) Unresolved Item (77-16-01) Access to the onsite first aid facility. The inspector reviewed the licensee's current provisions and facilities for first-aid and noted that storage of first-aid supplies had been moved to a location near the monitoring and change area. With the installation of security related equipment at the entrance to the previously designated first-aid room, access was restricted. Consequently, the licensee has designated the monitor and change area as the location where any needed first-aid may be given. The inspector determined that the use of the monitor and change area for first-aid/medical treatment coupled with the storage of necessary supplies in the immediate vicinity were now adequate.
- e. (Open) Unresolved Item (77-16-02) Provisions for training all categories of emergency assistance personnel. The inspector reviewed procedure 905.26, Emergency Plan Training, and Health Physics Form HP 905-17 Emergency Plan Training Schedule, and held discussions with licensee management regarding the emergency plan training program. The inspector noted that the

licensee's program did not include provisions for training of Emergency Duty Officers and Security Personnel. In addition, the inspector determined that form HP 905-17 had been rescinded due to terminology and training frequency discrepancies in comparison with the newly developed training procedure. The licensee stated that form 905.17 was being revised to conform with the new program and would be reinstituted upon completion. The inspector stated that further action would be required by the licensee to resolve the issue of emergency plan training.

- f. (Closed) Unresolved Item (77-16-03) Provisions for participation in drills by the local fire department. The inspector held discussions with licensee management and reviewed records of drills. The inspector determined that the Forked River Fire Department had been invited to, and attended, training sponsored by the licensee. In addition, the local fire department participated in a fire drill. The licensee has implemented provisions to invite the local fire department to participate in a fire drill each year.
- g. (Open) Unresolved Item (77-16-04) Control of review, updating and distribution of emergency procedure data forms. The inspector held discussions with licensee personnel and reviewed Health Physics Procedure 914.1, control of data forms. While all forms associated with implementation of the emergency plan had been placed under control, i.e., forms are reviewed and approved by the SORC, and an index of current forms is maintained, distribution of current forms is not controlled. In addition, procedure 914.1 only addressed one specific form.
- h. (Closed) Unresolved Item (77-16-05) Action guides for classifying emergencies. The inspector reviewed the licensee's implementing procedures and noted that action guides based upon control room instrument readings and assessment actions had been added. Also, four additional procedures had been developed, to include action guides, covering response actions for those accidents described and analyzed in the Final Safety Analysis Report.

3. Coordination with Offsite Agencies

The inspector reviewed records, procedures and written agreements relating to the licensee's coordination of emergency planning with agencies listed in the Emergency Plan and Implementing Procedures. The inspector discussed this subject with licensee representatives and persons of four offsite agencies - Lacey Township Police Department, Community Memorial Hospital, Lacey Township First Aid Squad, and New Jersey Bureau of Radiation Protection. These discussions verified that the existing agreements between the licensee and

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these agencies remain in effect, and that the licensee's contact and coordination were adequate for these agencies to maintain an effective response capability.

No items of noncompliance were identified.

4. Facilities and Equipment

The inspector examined the licensee's emergency facilities, equipment and instrumentation to verify that items specified in the Emergency Plan and Implementing Procedures were available for use and in an operable state. The inspection included examination of: a selection of emergency communications equipment; radioactive release monitoring instruments - area and process monitors, and meteorological instruments; medical treatment/decontamination facilities; emergency equipment kits; and the emergency control center and associated supplies and equipment.

No items of noncompliance were identified.

5. <u>Calibration</u>, Inventory, and Operational Checks of Emergency Equipment

The inspector reviewed a sampling of calibration, inventory, and operational check records covering the period August 1977 through July 1978 for the emergency response equipment listed in the Emergency Plan and Implementing Procedures. Records reviewed covered survey instrument calibration, emergency equipment inventories/checks, and emergency alarm tests.

During this review, the inspector noted that self-reading dosimeters in the emergency kits had not been spike and leak tested prior to having been placed in the kits. Further review indicated that the emergency kit dosimeters also were not included in the licensee's schedules for 6 month rechecks. The inspector informed the licensee that the failure to spike and leak check self-reading dosimeters in the emergency kits constituted noncompliance with the requirements of Technical Specification 6.11 concerning the following of procedures and HP Procedure 906.17, Spike testing and Leak testing of Self-Reading Dosimeters. (78-20-01)

Prior to the completion of the inspection, the licensee replaced all self-reading dosimeters in the emergency kits with ones that had been recently spike and leak tested.

With the exception of the aforementioned item, all other emergency equipment had been maintained as required.

The inspector had no further questions.

6. Training

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The inspector reviewed training related documentation and procedures and interviewed five persons assigned to the licensee's emergency organization to verify that training required by the Emergency Plan and Implementing Procedures had been conducted. Training conducted since July, 1977 included sessions for the: search and rescue team; emergency monitoring team; assistant emergency duty officers; data recorders; Community Memorial Hospital; Lacey Township First-Aid Squad; and Forked River Fire Department.

The inspector determined that required training had been provided.

No items of noncompliance were identified.

7. Emergency Drills

The inspector reviewed records of six emergency drills conducted since the previous emergency planning inspection. The inspector determined that: the licensee used qualified personnel to evaluate the organization's response; critiques were held, during which discussion highlighted improvement possibilities; and appropriate actions had been initiated or completed to correct any areas needing improvement.

No items of noncompliance were identified.

8. Emergency Plan Implementing Procedures

The inspector reviewed and evaluated any changes to the Emergency Plan Implementing Procedures and determined that the revised procedures provided the same or higher degree of preparedness as previous ones and that changes had been reviewed and approved as required. The inspector examined copies of the implementing procedures located in the emergency control center and control room and verified that they were up-to-date.

No items of noncompliance were identified.

9. Management Control - Emergency Planning

a. Established/Documented Program

The inspector reviewed procedures, applicable technical specifications and held discussions with responsible licensee personnel and verified that a program of management control over emergency planning activities existed. This program: consists of the delineation of planning responsibilities and authorities; provides for periodic reviews, audits and updates of Emergency Plan implementation; and delineates responsibility for overall conduct of reviews, audits and updates.

b. Reviews and Audits

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The inspector reviewed a report of an audit covering the Emergency Plan and Implementing Procedures which was conducted in November 1977. This report noted three items requiring further action. Additional review indicated that all items had been evaluated by licensee management and that resolution of the three items was complete.

No items of noncompliance were identified.

10. Field Emergency Monitoring

To verify the utility of the licensee's equipment and procedures for performing emergency field environmental sample counting, the inspector provided two standard mock iodine sources to an individual assigned to the emergency monitoring team. The inspector requested that the sources be evaluated using implementing procedures, 905.54, Emergency Monitoring Kit Counting of Particulate and Charcoal Filters, and 905.63, Emergency Monitoring Team - Air Sample Calculation.

The inspector noted that the team member demonstrated proficiency in the use of the procedures and counting instrumentation. Results obtained from the licensee's evaluation of the standard sources were in agreement with those of the NRC.

No items of noncompliance were identified.

11. Exit Interview

The inspector met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on August 24, 1978. The inspector summarized the purpose and the scope of the inspection and the inspection findings. The licensee acknowledged the item of noncompliance and provided the following additional information regarding two unresolved items which were not resolved during the inspection:

Emergency Plan Training (77-16-02)

Licensee management acknowledged that certain additional categories of emergency personnel (i.e., emergency duty officers and security personnel) would be added to the training procedure. It was further stated that appropriate review and revisions to HP form 905-17, would be pursued to achieve conformity between procedure 905.26 and the training schedule. Control, Review, Updating and Distribution of Emergency Procedure Data Forms (77-16-04)

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Licensee management confirmed that two additional actions would be necessary to insure proper control of the emergency procedure data forms:

- Development of a distribution listing for pre-positioned copies of forms; and,
- Clarification of procedure 914.1, Control of Data Forms, to address all forms.