



## Omaha Public Power District

1623 HARNEY ■ OMAHA, NEBRASKA 68102 ■ TELEPHONE 536-4000 AREA CODE 402

December 8, 1982

LIC-82-397

Mr. W. C. Seidle, Chief  
Reactor Project Branch 2  
U. S. Nuclear Regulatory Commission  
Region IV  
611 Ryan Plaza Drive, Suite 1000  
Arlington, Texas 76011

Reference: Docket No. 50-285

Dear Mr. Seidle:

### IE Inspection Report 82-23

The subject Inspection Report identified fourteen (14) open items resulting from an inspection completed during the 1982 Fort Calhoun Station emergency preparedness exercise. The District's responses and corrective actions to these open items are attached.

Sincerely,

W. C. Jones  
Division Manager  
Production Operations

WCJ/TLP:jmm

Attachment

cc: LeBoeuf, Lamb, Leiby & MacRae  
1333 New Hampshire Avenue, N.W.  
Washington, D.C. 20036

Mr. J. L. Montgomery, NRC  
Emergency Preparedness Analyst  
Mr. E. G. Tourigny, NRC  
Project Manager  
Mr. L. A. Yandell, NRC  
Senior Resident Inspector

IE 35

ATTACHMENT

OMAHA PUBLIC POWER DISTRICT'S RESPONSE  
TO IE INSPECTION REPORT 82-23

| <u>Open<br/>Item<br/>No.</u> | <u>Description</u>   | <u>Steps Which Will Be Taken</u>   | <u>Completion<br/>Schedule</u>   |
|------------------------------|--|--|--|
| 8223-01                      | In the interest of realism, future scenarios and exercises should be carefully controlled with no pre-staging of equipment or personnel allowed. | The District believes this open item refers to the placement of the extra or training operations shift in the control room for emergency response assignment. It has always been the policy of the District that, during emergency exercises, the shift assigned normal plant operational responsibilities continue the safe operation of the plant and that the extra or normally off-duty shift provide the emergency exercise participation. The District believes official OPPD observers may have established their stations several minutes prior to 0645. In the absence of specific actions or activities identified either within Inspection Report 82-23 or observer comments, the District assumes these two examples constitute the prestaging. The District will evaluate its policies for extra shift participation and observer stations in the control room and initiate methods to reduce prestaging of personnel or equipment. | Prior to the 1983<br>Emergency Exercise  |
| 8223-02                      | Accountability of personnel dispatched from the control room should always be maintained.  | The District will review Emergency Procedures EPIP-OSC-2 through EPIP-OSC-9 and EPIP-EOF-9 and establish a method to maintain continuous control room accountability.  | May 1, 1983  |
| 8223-03                      | Health physics monitoring and sampling in the control room should be reviewed to ensure that proper procedures are being followed.               | Health physics procedures HP-5, HP-9, and HP-15 and EPIP-EOF-3 will be reviewed to ensure proper procedures are identified and can be followed. The corrective action based on this review will be to either revise the existing procedure or establish a new, specific procedure identified in the EPIP's to ensure health physics monitoring and sampling can be accomplished in the control room.   | Review Completion:<br>March 31, 1983<br><br>Corrective Action<br>Completion:<br>July 1, 1983 |

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| 8223-04             | The OSC should serve as the plant logistic support center as described in NUREG-0696. The OSC functions should not be dispersed in other emergency support facilities. | The Fort Calhoun Station OSC properly provides plant logistic support which is coordinated during an emergency and restricts control room access to support personnel. These activities are conducted at the Shift Supervisor office area and a designated area of the Technical Support Center building as identified in the Radiological Emergency Response Plan. The District believes available plant spaces for emergency occupancy mandate these locations. The District believes the assembly area for maintenance support personnel should remain near the TSC structure, but will re-evaluate our OSC concept and function for the capability to better consolidate operational logistic support personnel. | July 1, 1983                   |
| 8223-05             | The management structure in the TSC should be reviewed with emphasis given to ensuring strong leadership and management in the early phases of TSC operation.          | As evidence by the operation of the Technical Support Center staff during the afternoon period of the emergency exercise, the manager and members of this group demonstrated their ability to provide plant management and technical support to reactor operating personnel. The District believes the actions of this group may be performed in a more efficient manner. Therefore, a review of the management structure as well as the physical work location of individuals in the TSC will be conducted to ensure effective operation of this facility.  | July 1, 1983                   |
| 8223-06             | Surveys and sampling should efficiently and accurately determine TSC habitability. Sampled air should be representative of the total TSC ventilation.                  | The concern referenced in the subject Inspection Report appears to be due primarily to the operational status of the newly acquired particulate, iodine, and noble gas monitor (PING 1A). At the time of the exercise, the physical installation of PING 1A was near completion, but calibration and setting of alarms was still in progress. By operating the PING prior to full calibration, the radiation protection technician was testing as much of the emergency plan as is reasonably achievable in the spirit of 10 CFR 50 regulations. As of this date, calibration of the PING 1A has been conducted and final  | January 1, 1983                |

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| 8223-06<br>(Continued) |   | review and incorporation of the alarm setpoint into the monitor remains to be completed prior to declaring the unit fully operational. During operation of the PING 1A, the air sample nozzle is located in the ventilation duct. During emergency conditions in the recirculation mode, the sampled air analyzed is representative of the total TSC ventilation. The District believes the installation and final calibration of the PING 1A will correct this open item concerning TSC habitability measurements.                            |   |
| 8223-07                | The Emergency Plan and Implementing Procedures should be revised to clearly describe the interface between the health physics and TSC operations.                                   | The Emergency Plan and Implementing Procedures discuss health physics control under the Health Physics/Chemistry Supervisor function and support of these activities under the TSC manager function. As established in the Emergency Plan, the HP/C Supervisor is a member of the Plant Operations Manager staff and keeps this individual informed of his activities and determinations. The District will review the organizational arrangement, assignment, and responsibility of these three positions and clearly define their interface. | July 1, 1983                            |
| 8223-08                | The Health Physics Supervisor should be cognizant of the length of time monitoring teams have been dispatched, particularly in high radiation areas.                                | As recorded in the emergency log, an accountability of the monitor team dispatched into the auxiliary building was maintained. In addition, voice communication with this team was conducted. The District believes the HP supervisor was cognizant of their activities and provided adequate control through his initial instructions, outfitting with appropriate instruments, dosimetry and protective equipment in the Radiation Work Permit, recording of plant area monitor levels and knowledge of their exit from the radiation area.  | No Further Action<br>is Necessary       |
| 8223-09                | Prompting and coaching by the Manager of Radiation Health and Emergency Planning, or any licensee personnel, should not be allowed as this is contrary to the licensee's Evaluator- | The Manager-Radiological Health and Emergency Planning has stated that his action was based on the Evaluator-Controller General Instruction that a major deviation from the approved scenario would not be permitted and events in mid-afternoon appeared to alter the scenario and exercise objectives. The District disapproves of   | Prior to the 1983<br>Emergency Exercise |

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| 8223-09<br>(Cont.)  | Controller General Instructions and the objective of conducting a realistic scenario that demonstrates the licensee's emergency response capabilities.                     | interfering actions by either the Manager-Radiological Health and Emergency Planning or any licensee personnel and will apply proper controls. The District will appoint a formal group for preparation of the scenario. The members of this group will <u>not</u> be participants in exercise response. All members of this group will serve as observers-controllers only. The Manager-Radiological Health and Emergency Planning will not participate in the preparation of the scenario or pre-briefings. His role will be restricted to his emergency function as the Emergency Coordinator.  |   |
| 8223-10             | Emergency response status boards should be redesigned to provide trending of important plant parameters.   | New status boards for Fort Calhoun Station emergency conditions were designed utilizing NUREG-0654, Evaluation Criteria E.4, and installed in mid-1982. Additional plant parameters are maintained on chalkboard. Trending on important plant parameters is accomplished by instrumentation located in the control room and TSC. It is expected that the Emergency Response Facility computer displays to be located in the TSC and EOF will ultimately provide the optimum trending indications. However, for the near term, OPPD will re-evaluate its status boards for methods to better display important plant parameters and trends. | Prior to the 1983<br>Emergency Exercise |
| 8223-11             | Briefing of EOF personnel following emergency action level declaration should be timely and protective action recommendations should be given to state and local agencies. | Log entries do not support these two observations. During the exercise, periodic briefings of the EOF recovery staff were held by the Recovery Manager throughout the day. The Information Specialist was included in these briefings and news releases were forwarded to the Media Release Center as a result of these briefings. The declaration of the general emergency was recorded at 1431. Log entries identifying 25 rem thyroid dose by the Iowa monitor teams and the potential for a large containment release were the basis for this decision. Emergency Plan Implementing  | During 1983 Annual<br>Retraining        |

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| 8223-11<br>(Cont.)  |   | <p>Procedure EPIP-OSC-1, Items IV.4.a. and c., provided the basis for the determination. Protective action recommendations were provided to the applicable state (Nebraska and Iowa) and local officials (Washington and Harrison) during a conference call in accordance with the EPA guidelines (i.e., evacuation in sectors EFG to 5 miles and in-house shelter between 5-10 miles). These recommendations were accepted by the state representatives. Recommendations to remove the protective actions were made at 1550 when de-escalation was discussed through the conference network. Although the District does not concur that an open item is appropriate here, the District will continue to emphasize timely personnel briefings, application of EPIP-OSC-1 and protective action recommendations to state and local emergency operation personnel during the conduct of an emergency or exercise.</p>   |   |
| 8223-12             | Weather forecast information should be obtained and used. | <p>Pre-planning for weather forecast information is described in the Radiological Emergency Response Plan, Section C.1.2.4, "National Weather Service," and with a letter of agreement which states:</p> <p>"The National Weather Service agrees to provide weather information to the Fort Calhoun Station as needed. Inversions, wind pattern, direction and speed are among some of the weather information which may be provided in the event of a radiological emergency. The National Weather Service operates on a twenty-four (24) hour basis."</p> <p>Contact with the National Weather Service is checked by regular quarterly telephone number verification and has been tested during drills. However, since this support is not contained in a specific implementing procedure, the District will review its dose assessment and projection procedures, especially EPIP-RR-6, and will revise the procedure to reference the source and utilization of weather forecast information.</p> | Prior to the 1983<br>Emergency Exercise |



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| 8223-13             | Rescue team equipment should include first-aid supplies and radiation detection instruments.           | Instruction in the Radiological Emergency Response Plan (RERP) for emergency re-entry team members entering the plant specifies "obtain and battery check high range survey instrument". Additionally, the selection of a survey instrument from the instrument cabinets is made by a team member based on training and Radiation Protection Procedure RPP-18, "Instrument Selection". Further, re-entry teams are not outfitted with first aid supplies. They are instructed and trained to move injured personnel away from high radiation areas and to utilize first aid kits stationed at specific locations throughout the plant until arrival of the rescue squad. However, the District will review and revise the RERP, Section B.2.4.b, and EPIP-OSC-7, "Personnel Rescue," during the next annual review to provide specific reference and clarity for use of first aid supplies and proper radiation detection instruments by rescue team personnel. Rescue team personnel will become cognizant of these procedural changes during the annual retraining cycle. | September 1, 1983                |
| 8223-14             | More thorough training should be given to personnel who are assigned dose assessment responsibilities. | The District has reviewed the emergency preparedness training program and believes it is thorough and comprehensive. All shift health physics technicians are trained to make initial dose assessment evaluations. The District believes the problems encountered by the subject technician were due to limited experience and were an isolated case. The District believes that as additional experience is gained by this individual, job proficiency and accuracy will increase. Additionally, the District will continue to perform initial emergency preparedness training with annual retraining for all persons assigned emergency preparedness responsibilities. The training for personnel assigned dose assessment responsibilities is detailed and includes a practical factor demonstration observed and approved by the instructor.  | During 1983<br>Annual Retraining |