

U. S. Nuclear Regulatory Commission
Region I

Report Nos. 50-245/90-21
50-336/90-23
50-423/90-21

Docket Nos. 50-245
50-336
50-423

License Nos. DPR-21
DPR-65
NPF-49

Licensee: Northeast Nuclear Energy Company
P. O. Box 270
Hartford, Connecticut: 06101-0270

Facility Name: Millstone Nuclear Power Station

Inspection Conducted: October 15-19, 1990

Inspection At: Berlin and Waterford, Connecticut

Inspectors: *C. G. Amato* for 12/3/90
C. G. Amato, Emergency Preparedness
Specialist, Region I date

Approved: *W. J. Lazarus* 12/3/90
W. J. Lazarus, Chief, Emergency
Preparedness Section, Division
of Radiation Safety and Safeguards date

Inspection Summary: Inspection on October 15-19, 1990 (Combined Inspection Report Nos. 50-245/90-21, 50-336/90-23, and 50-423/90-21)

Areas Inspected: Announced, routine, safety inspection of the licensee's emergency preparedness program. Inspection areas included: the emergency preparedness program; emergency response facilities; organization and management control; training; and off-site activities.

Results: No violations, deviations or unresolved items were identified.

DETAILS

1. Persons Contacted

The following Northeast Utility personnel attended the exit meeting.

W. Buck, Senior Nuclear Emergency Preparedness Coordinator, Millstone Point
R. Factora, Director, Unit Services, Millstone Point
H. Haynes, Director, Unit 1, Millstone Point
S. Hodge, Supervisor, General Nuclear Training, Training Department.
P. Klement, Director, Unit 3, Millstone Point
P. Luckey, Senior Nuclear Trainer, Training Department
W. McCance, Senior Nuclear Emergency Preparedness Coordinator, Haddam Neck Plant
E. Molloy, Supervisor, Emergency Preparedness
S. Scace, Station Director, Millstone point

The inspectors also interviewed other licensee personnel.

2. Licensee Action on Previously Identified Items

The following items were identified during previous inspections. Based on observations made by the NRC inspector, review of the Emergency Plan (EP) and Implementing Procedures and interviews with the Millstone staff, these items were satisfactorily addressed by the licensee and are closed.

(CLOSED) Inspector Follow-up Items: 50-245/89-20-01, 50-336/89-20-01, and 50-423/89-20-01. The Emergency Plan (EP) and the Corporate Organization for Nuclear Incidents (CONI) Procedure Manual should be reconciled to clarify responsibilities (refer to NRC RI Inspection Report 50-245/89-20, 50-336/89-19, and 50-423/89-20, section 7.0). Responsibilities are stated in revision 5 of the EP section 5.1.2 for the Director of Site Emergency Operations (DSEO) and section 5.2.1 for the Director of Corporate Emergency Operations (DCEO). These responsibilities are also stated in Section 7 of Millstone Point Emergency Plan Implementing Procedure 4001 for the DSEO and CONI 3.01 section 6.8 for the DCEO.

(CLOSED) Unresolved Item: 50-245/87-17-02. Millstone Point Unit 1 and Unit 2 Emergency Action Level classification tables do not adequately address Technical Specification (TS) shutdowns and loss of Engineered Safety Features (ESF). TS shutdowns are covered in the Event Table under Miscellaneous. Loss of ESF is also addressed in the Event Table under equipment failure.

3. Operational Status of the Emergency Preparedness Program

3.1 Emergency Plan and Implementing Procedures (EIPs)

To determine if the standards of 10 CFR 50.47(b)(16) and the requirements of 10 CFR 50.54(q) and Section G of Appendix E to 10 CFR 50 are met, the inspector reviewed the Emergency Plan Implementing Procedures.

The inspector reviewed EPIP 4701, "Unit Incident Assessment, Classification, and Reportability" to determine whether a recent revision to the procedure change would prevent recurrence of a classification problem that occurred when the Unit 2 diesel electric generator did not start or could not be loaded (see NRC RI Inspection Report 50-245/89-20, 50-336/89-19, and 50-423/89-20, section 14). Changes to the Implementing Procedure and development of an Emergency Action Level (EAL) Users Guide have addressed this problem. However, the inspector did note a minor semantic problem -- the Emergency Action Level (EAL) was included as part of the definition of the associated symptom. This was discussed with the Manager, Radiological Assessment Branch of the Northeast Utility Service Company, who agreed to correct the definition and stated an action item would be issued to track resolution.

The remaining revised EIPs will be reviewed during a subsequent inspection.

Based on the above review, this portion of the licensee's emergency preparedness program is acceptable.

3.2 Emergency Response Facilities (ERFs)

ERFs are designed and maintained to meet the standards of 10 CFR 50.47(b)(8) and (b)(9), and the requirements of Section IV of Appendix E to 10 CFR 50, Supplement I to NUREG-0737 and Regulatory Guide 1.97.

ERFs were inspected. Equipment, instrumentation, supplies, status boards, maps, safety system diagrams were checked. Communication systems were tested on a sampling basis for each ERF.

The inspector determined that the ERFs were maintained in a state of readiness. Instrumentation was functional and within the calibration period. Communication systems tested included the NRC Emergency Notification System, and the Health Physics Network phones. Notification calls were made and verification requested and received. All tested equipment worked properly.

The common Operation Support Center for Units 1 and 2 has been reconfigured

to provide more space for the OSC management area and to serve as the ready room for staff awaiting assignment to emergency repair teams.

Based on the above findings, this portion of the licensee's emergency preparedness program is acceptable.

3.3 Organization and Management Control

The emergency preparedness program structure was reviewed, personnel were interviewed and activities evaluated to ascertain if the licensee is maintaining and controlling an emergency preparedness program required by 10 CFR 50.54(t), 50.47(b) and the requirements of Section IV of Appendix E to 10 CFR 50.

Development and maintenance of the emergency preparedness program is the responsibility of the Emergency Preparedness Section of the Northeast Utility Service Company (NUSCO). The inspector reviewed organizational structure and staffing and concluded no significant changes had taken place since the last inspection.

The licensee has developed proposed Administrative Control Procedure 1-15 which would formalize the emergency preparedness interface at the site between NUSCO and the Northeast Nuclear Energy Company. This Procedure would also assign responsibility for 10 CFR 50.54(q) reviews to the Senior Nuclear Emergency Preparedness Coordinator (SNEPC). The inspector observed a Station Operation Review Committee meeting at which this Procedure was considered for approval. Approval was not given pending further review as to who should complete 50.54(q) reviews.

The position of Station Services Director has been replaced by the positions of Unit Services Director and Station Services Director. The SNEPC will effect liaison with the Director, Unit Services. This Director has also been assigned the task of reviewing and up-grading the Millstone Implementing Procedures for each unit. To do this the position of analyst has been created and an experienced emergency planner has been selected to fill this position.

Management review and control involves vice presidents, department and site directors, managers and supervisors. These individuals track emergency preparedness activities through attendance at meetings, resolving audit findings when necessary, and by two tracking systems -- the Corrective Action Items list and the Emergency Preparedness Commitment Follow-up List. In addition, they maintain emergency response organization qualifications, review scenarios and changes to the Plan and Procedures, participate in drills and exercises and interface with State and Town officials. All managers interviewed expressed

satisfaction with the emergency preparedness program.

Based on this review, this portion of the licensee's emergency preparedness program is acceptable.

3.4 Knowledge and Performance of Duties (Training)

Emergency preparedness lesson plans, training matrix, examinations, training and attendance records and the Site Emergency Organization qualification roster were reviewed. Appropriate Training Department (TD) staff members were interviewed to verify that emergency preparedness training is in compliance with 10 CFR 50.47(b)(15) and Section IV. F of Appendix E to 10 CFR 50. The status of off-site training was also reviewed.

Emergency preparedness training (EPT) is current and is given in accordance with the policies stated in the Nuclear Training Manual. At least three personnel are qualified for each key Site Emergency Organization (SEO) positions. EPT is now scheduled uniformly over the course of a year. Only major Plan and Procedure changes made after the annual cycle has begun will be covered in additional classroom training. As an alternative, requalification by a "read and sign" procedure, which is permitted by the Nuclear training Manual procedures may be used. EPT question selected from the question bank were reviewed. They were of various types, probing and balanced. An area that needs improvement is the identification of new hires or current staff who need EPT. The qualification list identifies those who have completed training or are scheduled for training but does not identify those who have been recently assigned to SEO positions. The Director, Unit Services was assigned the responsibility to resolve this issue.

Reactor operators receive appropriate classroom and simulator training in emergency preparedness including classification of events. Training in Protective Action Recommendation (PAR) development is not provided to the operators because the Connecticut State Posture Codes associate specific PARs with the NRC's emergency classification levels.

Non-operator SEO managers are trained in classification and PAR development by the staff of the Training Department's General Nuclear Training group. During the last routine inspection several differences in this area of emergency preparedness training were identified between operators and managers. To correct this Operator Trainers are invited to participate in the training of on-call Directors of the SEO. A Users Guide for Emergency Action Level classification has been developed and is now in use.

Training of volunteer fire company and ambulance company members who would

come on site to support licensee emergency response activities was current. Medical training for these personnel and personnel of the support hospital staff was given by a medical consultant. Training of governmental Emergency Plan Zone emergency workers is the responsibility of the Emergency Preparedness Section. A review of training records indicated that training was provided as scheduled.

Based on the above review and observations, this portion of the licensee's emergency preparedness program is acceptable.

3.5 Independent Audits/Reviews

At the time of this inspection, the licensee's 1990 audit /review was only partially complete. This area will be reviewed during a subsequent inspection report.

3.6 Notification and Communications

Communications systems were checked to ascertain if the standards of 10 CFR 50.47(b)(5) and (b)(6), the requirements of Sections IV. D. 1 and E.9 of Appendix E to 10 CFR 50.

Siren availability during 1989 was above U.S. FEMA availability specifications. The licensee modified siren testing frequency to once per quarter based on the historical availability record and the experience of other NRC power reactor licensees who utilize similar siren systems and had also reduced test frequency. In addition, NUSCO conducted a Probabilistic Risk Assessment of siren components and identified those with the highest failure rate and then replaced those components. The State of Connecticut and U.S. FEMA Region I concurred in the decreased siren test frequency.

Daily pager tests continue. A computerized notification and verification system has replaced the tape system. The new Emergency Notification and Response System is expected to reduce off site verification time by one third.

Based on the above review and observations, this portion of the licensee's emergency preparedness program is acceptable.

3.7 Public Information and Off-Site Activities

Correspondence, documentation and records, and personnel were interviewed and a siren test observed to determine if the standards of 10 CFR 50.47(b)(5) and (b)(12), and the requirements of Sections IV. D. 3. and IV. F. of Appendix E to 10 CFR 50 were met.

Telephone book inserts appear in three directories. Brochures were mailed to Emergency Planning Zone residents, Town officials and motels. A mass media briefing was held in conjunction with a wire service meeting for reporters. A briefing packet was prepared for attendees. The licensee maintains an on-going interface with State and Town governments. All Letters of Agreement for off-site responders to support the licensee in the event of an accident are current. Emergency Action Levels were called to the attention of cognizant off-site officials. Training of off-site officials was offered and given.

Based on the above, this portion of the licensee's emergency preparedness program is acceptable.

4. **Exit Meeting**

An exit meeting was held with licensee personnel identified in Section 1 of this report on October 19, 1990. The inspector presented the results of the inspection and advised the licensee no violations or deviations were identified, and one unresolved item and inspector follow-up item were closed.