

DMB

(608) 788-4000

October 11, 1982

In reply, please refer to LAC-8653

DOCKET NO. 50-409

Mr. J. A. Hind, Director  
Division of Emergency Preparedness  
and Operational Support  
U. S. Nuclear Regulatory Commission  
Region III  
799 Roosevelt Road  
Glen Ellyn, IL 60137

SUBJECT: DAIRYLAND POWER COOPERATIVE  
LA CROSSE BOILING WATER REACTOR (LACBWR)  
PROVISIONAL OPERATING LICENSE NO. DPR-45  
RESPONSE TO DEFICIENCIES IDENTIFIED IN APPENDIX A  
OF NRC INSPECTION REPORT 50-409/82-11 (DEPOS)

REFERENCE: (1) NRC Letter, Hind to Linder, dated September 15, 1982

Dear Mr. Hind:

In response to your letter (Reference 1) which identified several deficiencies during our August 3, 1982, emergency preparedness exercise performance, this letter describes Dairyland Power Cooperative's planned or taken corrective actions regarding these deficiencies presented in Appendix A of Reference 1.

NRC ITEM OF CONCERN:

Facilities and Equipment

- a. In the EOF and TSC, the licensee should utilize status boards, visual displays, trend plotting and plant parameter displays to improve tracking of emergency activities, in-plant status, and followup on recommendations made to the control room.

DPC RESPONSE:

LACBWR will have a TSC to EOF Data Acquisition System installed and operating during October, 1982. This system will have the capability to trend plant parameters. Currently in the EOF, we have plant and radiological parameters

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status boards which can be updated with grease pencil. These were not used during the August 3rd exercise. During future exercises, we plan to post updated parameters periodically in both the EOF and TSC.

NRC ITEM OF CONCERN:

*b. Adequate forms for logging data should be maintained in the TSC.*

DPC RESPONSE:

During the August 3, 1982, exercise, there was an adequate supply of data logging forms in the supply cabinet in the TSC. However, not all of these forms were taken out of the cabinet during the exercise, making it appear as if there were an insufficient number of blank forms.

NRC ITEM OF CONCERN:

*c. Maps and charts should be mounted and displayed on the walls of the EOF.*

DPC RESPONSE:

Since the EOF Command/Communications Center is located in Conference Rooms A/B of the Dairyland Power Cooperative LaCrosse Office Building, which are used for normal meeting rooms, the maps and charts will not be permanently mounted on the walls. However, hooks for maps and charts will be put on the walls, so that the maps and charts can be placed on the walls upon activation of the EOF.

NRC ITEM OF CONCERN:

*d. The High Range Containment Building Area Radiation Monitor readouts are poorly located in the control room and do not allow easy reading by a short person. Also, the labeling of these monitors (Channel 2 West and Channel 1 East) did not correspond to item 4, A and B on the Radiological Assessment Director's data sheet.*

DPC RESPONSE:

The Radiological Assessment Director's data logging form will be changed in the next revision to EPP-2 to correspond to Channel 2 West and Channel 1 East in lieu of Channel A and Channel B. During accident conditions, we are primarily interested in observing High Range Containment Building Area Radiation Monitor trends, and the current monitor readability is sufficient for the accuracy necessary during accident situations. In addition, there is a horizontal strip chart recorder for these monitors located next to the meter readouts which can be observed readily for trends. The High Range Containment Building Area Radiation Monitor readout module location is being evaluated in the detailed control room design review as per NUREG-0700.

NRC ITEM OF CONCERN:

- e. *Maps and charts used in the JPIC were too small for briefing purposes. Larger, colored maps would aid in making more effective presentations.*

DPC RESPONSE:

We concur in this observation and will initiate a review of existing graphics as well as other audio-visual aids used at the JPIC with the intent of making this material more descriptive and easy to understand. In addition, media press kits will contain more detailed graphics.

NRC ITEM OF CONCERN:

Communications

- a. *The telephone system and working area in the TSC for the Radiological Assessment Director needs improvement.*

DPC RESPONSE:

A longer cord for the Radiological Assessment Director's communication headset had been ordered prior to the exercise but has not been received to date. When received and added to the telephone unit, it will facilitate movement in the TSC. The TSC working area originally intended for the Radiological Assessment Director was occupied initially by three NRC Observers during the exercise, but later during the exercise was used by the Radiological Assessment Director.

NRC ITEM OF CONCERN:

- b. *There should be public address announcements in the plant at each classification phase of the escalation and deescalation of the exercise.*

DPC RESPONSE:

We currently announce localized emergency situations in the plant (e.g., fire, high radiation areas, other hazards) over the public address system. If there had been a real emergency, as depicted by the August 3rd scenario, public address announcements at various phases of the emergency would have been announced. These announcements may or may not have occurred simultaneously with NUREG-0654 Emergency Classification phases. In the future, during exercises, we will announce Alert phase and above over the P.A. and announce de-escalation from General Emergency to Alert phase.

NRC ITEM OF CONCERN:

- c. *A more reliable means of communication should be provided between the environmental teams and the TSC and EOF especially during inclement weather conditions.*

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DPC RESPONSE:

DPC utilizes a state of the art FM mobile radio in our Emergency Environmental team vehicle to communicate via a DPC Repeater Station on Grandad's Bluff from the field to the EOF during the August 3rd exercise. (Refer to p. 62 of EPP-2, Issue 7.) This radio was operated under actual extremely adverse meteorological conditions during the exercise. Severe weather, including severe thunderstorms, moved through the area during the drill, and messages were received at the EOF and at the field team's location without great difficulty. At times the messages were somewhat influenced by static, but were received. On two occasions, communication between the field team and the EOF were disrupted but was reestablished in a timely fashion. At times, operator at the DPC Office Building, and the call shunted to another extension in the EOF, because the IRAD phone number was being used to communicate with state radiological organizations. This may have made it appear as though messages were not received in a timely fashion. DPC feels that this system performed extremely well during these adverse environmental conditions. There are no other more reliable means of communication between the environmental teams and the TSC and EOF available to us at this time. Phone service is limited and there are few pay phones within the EPZ.

NRC ITEM OF CONCERN:

- d. Ensure that written procedures are followed by the environmental teams.

DPC RESPONSE:

During the exercise, the environmental team did not refer to procedure EPP-8, "Offsite Radiological Survey," although communications with the EOF revealed that they were following the content of the procedure. They utilized the IRAD data logging forms and proceeded to the downwind hypothetical affected sectors with their instruments in the operate mode. On August 9, 1982, a new revision to EPP-8 was issued which contains an initial check-off list as Attachment A. This will require that the environmental team refer to the procedure prior to departure to offsite locations. Data logging and rapid field calculation forms are included in this procedure revision which will make procedural referral more necessary in future exercises.

NRC ITEM OF CONCERN:

- e. Telephone calls should not be made from the JPIC directly to the Control Room, instead of to the EOF.

DPC RESPONSE:

At no time did DPC's public information director make any calls to either the control room or the TSC during the exercise. A clearly delineated and exclusive line of communications with the EOF is the only authorized

information channel contained within plans and procedures. To the best of our knowledge, no one else present at the JPIC initiated a call to the control room. (We would request from the NRC specific information on this observation so that we might contact the originators of any calls to insure that repetition will not occur.)

NRC ITEM OF CONCERN:

- f. *The NAWAS system should be repaired and maintained to ensure it is operational.*

DPC RESPONSE:

The NAWAS phone system has been repaired. Maintenance of the NAWAS is not in LACBWR's control, but under the direction of the Wisconsin Telephone Company. We report NAWAS outages to Wisconsin Telephone.

NRC ITEM OF CONCERN:

3. Command and Control

*The duties of the TSC Radiological Assessment Director should be better defined. He was too occupied with constant telephone conversations and filling out forms to track activities during the exercise, making it difficult, if not impossible, to manage or direct the health physics coverage.*

*Much more time should have been available for data digestion, leadership, and monitoring of the exercise. There were an insufficient number of health physics personnel in the TSC.*

DPC RESPONSE:

In the next revision to EPP-2, the plant Radiological Assessment Director will be assigned a technical communicator to relay information between the TSC and EOF. This will allow the Radiological Assessment Director more time to manage or direct health physics activities, provide leadership and digest radiological parameters. This should provide sufficient health physics coverage in the TSC.

NRC ITEM OF CONCERN:

4. Procedures

- a. *Habitability surveys for airborne concentrations of radioactivity and radiation background in the TSC and the Control Room should be performed during emergency situations.*

DPC RESPONSE:

Habitability surveys for airborne concentrations of radioactivity and background radiation levels in the TSC and Control Room will be made as applicable during emergencies. The August 3rd scenario did not involve a radiological release and the available instrumentation and surveys did not indicate a need to perform additional TSC or Control Room habitability surveys. A control room ARM with local readout currently exists. Dedicated portable radiation monitors are currently located in the TSC. Also, during 1982, radiation monitors which continuously indicate radiation dose rates and airborne radiiodine concentrations will be added to the TSC for use during an emergency. These monitoring systems will include local alarms with trip levels set to provide early warning to TSC personnel of adverse conditions that may affect the habitability of the TSC.

NRC ITEM OF CONCERN:

- b. *Provisions for a communicator for the ENS and HPN lines, JPIC communications, and appropriate communications with State and local agencies should be provided for exercises.*

DPC RESPONSE:

During an emergency, the IRAD will initially man the ENS and HPN line in the EOF. If there is a need for additional personnel to man the ENS or HPN line at the TSC, they will be called in. The NRC, upon arrival at the TSC and EOF, will manage the ENS and HPN phone communications. The ECD secretary/recorder will perform additional communication activities with the JPIC and State and local agencies during exercises.

NRC ITEM OF CONCERN:

- c. *Security measures need to be improved for the EOF.*

DPC RESPONSE:

Security measures are provided for the LaCrosse Office Building and are adequate. Therefore, no additional security control for the EOF is necessary. During the exercise, an unidentified person entered the EOF area and was immediately challenged by the ECD. The individual was identified as an NRC observer who had just arrived at the EOF.

NRC ITEM OF CONCERN:

- d. *The interface procedures between the licensee and the State and local agencies should be upgraded to ensure that the early warning system is sounded in a timely manner in accordance with 10 CFR 50 Appendix E III.D.3.*

DPC RESPONSE:

During the exercise, there was no simulated offsite radiological hazard to the public. It is the State of Wisconsin's responsibility to activate the early warning system. DPC advises the State and local officials based on emergency classifications when to activate the Prompt Public Notification System (PPNS). The next revision to EPP-2 will include a statement under General Emergency Classification which says the ECD will remind State and local officials to activate the PPNS to warn the population within the EPZ within 15 minutes.

NRC ITEM OF CONCERN:

- e. *A cooldown rate for emergency situations should be established for the reactor.*

DPC RESPONSE:

The maximum reactor vessel cooldown rate is 150° F/hr. However, in an emergency (e.g., major primary leak,) the procedure requires the shutdown condenser to be used in the automatic mode, so as to attempt to depressurize and remove heat as rapidly as possible.

NRC ITEM OF CONCERN:

- f. *An individual should be assigned to operate the cascade self-contained breathing apparatus air bottle charging system.*

DPC RESPONSE:

If necessary, we will assign someone to operate the cascade SCBA air bottle charging system or obtain additional SCBA bottles from the DPC system. We will insert a step in the fire fighting procedure that, if a fire is of long duration, we will obtain additional supplied breathing air as necessary.

NRC ITEM OF CONCERN:

5. Training

- a. *Additional training should be provided for personnel in the EOF and TSC regarding responsibilities for classification of events, notification of State and local agencies and the content of messages, e.g., radiological and meteorological information and sectors affected. The procedures should be adhered to in this training program, particularly with respect to responsibility for recommending protective actions and the sounding of the prompt public warning system. The communications link with the Joint Public Information Center (JPIC) should be improved. A dedicated periodic contact between the EOF and JPIC is needed.*

DPC RESPONSE:

As per the revised DPC Emergency Plan, we will conduct retraining for Emergency Response personnel, adhering to procedures and emphasizing their responsibilities and assigned duties during 1982.

A dedicated telephone line connecting the EOF with the JPIC-PID exists and seems sufficient for communications purposes. There was sufficient periodic contact with the JPIC, logged at the EOF. In the future, the JPIC-PID will also document the frequency of contact. A second dedicated telephone line is not necessary in view of the limited telephone service available. Computer hookup or teletype redundancy can not be cost-justified and would create additional staffing requirements at both the EOF and JPIC. There were three telephones dedicated exclusively to use by the media alone. At no time during the public information director's scrutiny were all media phones in use at the same time. Both the State of Wisconsin and the State of Minnesota had two lines each, these lines shared by Houston County and Vernon County officials. In summary, there were seven telephone lines dedicated to state and media use. This number would be insufficient in the event of real mishap and underscores the PID's concern over telephone adequacy, but the observation in sub 2 is incorrect and would lead one to conclude that the observer counted only those telephones in the designated media area without visiting the areas designated for use by state and county entities.

NRC ITEM OF CONCERN:

- b. *Health physics technicians should be better trained in handling and preparing highly contaminated radioactive samples, wearing of protective clothing, and the use of the LACBWR emergency plan and implementing procedures.*

DPC RESPONSE:

EPP-6, "Sample Collection and Analysis During Emergencies," has been revised to include the post-accident sampling systems specified by NUREG-0737 on September 3, 1982. Health Physics technicians have participated in a detailed discussion of procedural content and have participated in post-accident sampling training walk-throughs. They will be trained in additional revisions to the Emergency Plan and implementing procedures.



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Div. of Emergency Preparedness & Operational Support

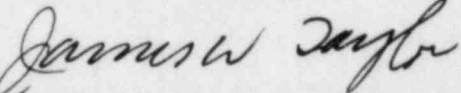
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We sincerely hope that these responses clearly state our planned or proposed corrective actions to your identified significant deficiencies presented in Reference 1.

If you have any additional comments, please contact us.

Sincerely,

DAIRYLAND POWER COOPERATIVE

  
for Frank Linder, General Manager

FL:PWS:dh