#### U.S. NUCLEAR REGULATORY COMMISSION

## REGION III

Reports No. 50-266/94007(DRSS); 50-301/94007(DRSS)

Docket Nos. 50-266; 50-301

Licenses No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company 231 West Michigan Milwaukee, WI 53201

Facility Name: Point Beach Units 1 and 2 Inspection At: Point Beach Site, Two Creeks, WI Inspection Conducted: April 4-8, 1994

Inspector: J. W. Mormed Barger for

<u>4/21/94</u> Date

4/21/94

Approved By: J. W. McCormick-Barger, Chief Radiological Programs Section

#### Inspection Summary

Inspection on April 4-8, 1994 (Reports No. 50-266/94007(DRSS); 50-301/ 94007(DRSS))

<u>Areas Inspected</u>: Routine, announced inspection of the operational status of the Point Beach Plant's Emergency Preparedness (EP) program (IP 82701). <u>Results</u>: No violations or deviations were identified. Overall maintenance of the Emergency Preparedness program was excellent. Facilities were in a state of operational readiness. An innovative training module addressed aspects of Command and Control. An exercise manual had been developed. The Corporate Emergency Center was inspected and found adequate. The 1994 audits and surveillances of the program satisfied the requirements of 10 CFR 50.54(t).

9405020056 940421 PDR ADOCK 05000266 PDR PDR

# DETAILS

### 1. Persons Contacted

## Wisconsin Electric Power

G. Maxfield, Manager, Point Beach Nuclear Plant
\*R. Chojnacki, Supervisor, Emergency Planning
\*L. Epstein, Training Specialist
\*R. Hetue, Emergency Planning Specialist
D. Marcella, Security Specialist
\*G. Casadonte, Fire Protection & Safety Coordinator
\*J. Becka, Regulatory Services Manager
\*J. Bevelacqua, Manager - Health Physics
\*A. Cayia, Production Manager
\*F. Flentje, Regulatory Specialist
\*L. Halverson, Site Services Manager
\*R. Seizert, Training Manager
\*J. McCullum, Security Supervisor

The above licensee staff attended either the entrance meeting or the exit interview on April 8, 1994. The inspector also contacted other licensee personnel during the course of the inspection.

\* denotes those attending the exit interview.

# 2. Licensee Action on Previously Identified Items (IP 82301)

(Closed) Inspection Followup Items No. 50-266/92003-02; 50-301/92003-02: During the 1992 annual emergency preparedness exercise, the protective measures and reactor safety groups in the Technical Support Center (TSC) needed to communicate more adequately regarding assessing offsite safety significance of degraded equipment, release duration, and release composition assumptions. Training documentation, including lesson plans LP2006 and LP1105, indicated that pertinent lesson plans had been modified to sensitize personnel to the need for improved communication on these issues. Review of documentation for the 1993 Emergency Preparedness Exercise indicated that these specific aspects were adequately addressed. This item is closed.

(Closed) Inspection Followup Item Nos. 50-266/93007-01: 50-301/93007-01: Point Beach Abnormal Operating Procedure AOP-10A, "Control Room Inaccessibility" (Revision 12, dated October 7, 1991) was reviewed during the previous routine inspection. The procedure provided operator guidance for plant control in the event of a worst-case fire and generic guidance when the control room was to be evacuated for any reason. Revision 12 of the procedure did not provide criteria as to when control room evacuation must be evaluated, e.g., extensive smoke, excessive heat, high radiation levels, or toxic/flammable gasses. The procedure was silent on emergency planning aspects of control room evacuations. The current procedure AOP-10A, "Safe Shutdown - Local Control," Revision 13, dated December 16, 1993, was reviewed and found to address the items above in sections 3.0 and 5.0. This item is closed.

(Open) Inspection Followup Item No. 50-266/93018-01: During the 1993 exercise, a performance problem was identified when the control room requested that isolation of the safety injection accumulators be given highest priority. This request was not properly communicated to the TSC. During the interim period from OSC accivation until the TSC was activated, the command relationship between the OSC and TSC was ambiguous. Establishing and communicating priorities was considered a concern to be followed up in a future exercise. This item will remain open pending demonstration.

(Open) Inspection Followup Item No. 50-266/93018-02: During the 1993 exercise, a problem in the Emergency Operations Facility (EOF) was knowledge of plant status. Status boards were not kept updated and the status of major emergency core cooling systems was not adequately communicated to the EOF emergency support manager. The adequacy of maintaining current and accurate plant status will remain an inspect... followup item for evaluation during the next exercise.

#### Operational Status of the Emergency Preparedness (EP) Program (IP 82701)

# a. Activations of the Emergency Plan

An Unusual Event was declared on February 8, 1994, at 2207 hours, due to a reactor shutdown being required by the plant Technical Specifications. Plant shutdown was required when both Emergency Diesel Generators (G-Ol and G-O2) were declared inoperable. Declaration of the Unusual Event was consistent with Emergency Action Level Category 13, "Loss of engineered safety feature requiring shutdown by Technical Specifications." A request was made to NRC Region III to terminate the load reduction so as to minimize reactor transients, and this was granted. Emergency Diesel generator G-O1 was returned to service and the Unusual Event terminated at 0244 hours on February 9, 1994. The NRC was notified of the event termination at 0253 hours on February 9, 1994.

Notifications to State and local agencies were completed at 2219 hours, and the NRC was notified of the event at 2257 hours on February 8, 1994. The State of Wisconsin and local counties were notified of the termination of the event at 0416 hours on February 9, 1994. These notifications are within the regulatory timeframes for initial notifications. Wisconsin Electric Power Company issued a press release concerning the event on the morning of February 9, 1994.

Licensee review of the event response identified four problems: (1) the offsite agencies asked for information as to why the event was declared, and the communicator did not have this information; (2) final (internal) notifications were not immediately completed; (3) the wrong form was used for event termination; and (4) notifications to the State and local counties of event termination were not timely. These items were placed on the emergency plan tracking system to track corrective actions.

No violations or deviations were identified.

## b. Emergency Plan and Implementing Procedures

A comprehensive and highly detailed Exercise Manual (dated February 1994) has been developed. The manual is designed so that an individual can utilize the manual for overall exercise or drill coordination with minimal support. Such a manual is of value. both in simplifying (by providing "boilerplate" guidance) exercise coordination for the current staff, and providing guidance should there be changes in the staff. The manual addresses general timeframes for actions, milestones to be completed, and scenario criteria. A six year plan for various objectives is included, as is a database program for recording and generating exercise objectives such that the six-year plan is met. Appendix 1 provides summaries of the exercise scenarios which have been utilized in the past and a drill exercise matrix. The summaries of past exercises can be very useful in assuring that nearidentical scenarios are not generated in short timeframes. Facility-specific exercise evaluation sheets are included, as well as controller guidance. A scenario team manual, designed to be given to the scenario generation team, provides excellent guidance.

A revised Crisis Communications Plan has been developed, with assistance from a communications consulting organization with a strong nuclear background. Discussion indicated that the previous plan was updated to more adequately address events which were less than "worst-case." This plan provides for early activation of a facility in Milwaukee, with a computer and telephone lines. The staffing of this facility would "mirror" the staffing of the Joint Public Information Center (JPIC) to a large extent, and handle citizen and media relations until the JPIC could be established and functional.

No violations or deviations were identified.

#### c. Emergency Response Facilities, Equipment, and Supplies

The TSC, OSC and EOF were as described in the plan and implementing procedures. Tours were conducted in each facility, and the inspector verified that current copies of the Emergency Plan and Emergency Plan Implementing Procedures (EPIPs) were available. The Emergency Notification System FTS-2000 telephones were tested and found functional. Each facility was clean and in an acceptable state of operational readiness. The inspector noted in the EOF Emergency Monitoring Team equipment storage closet that the O-ring seals on some of the air sampling equipment appeared to have dried out and were partially cracked. The licensee stated that they would review this concern and take action as necessary.

Discussion with licensee personnel indicated that a fiber optic link to the EOF was anticipated to be completed by August 1994. This would enable much faster updates to the Plant Process Computer System (PPCS) terminal located in the EOF. Slow updating of information on this terminal has been a problem in past drills and exercises.

An inspection was conducted of the Corporate Emergency Center (CEC) which is utilized as a backup facility to the Emergency Operations Facility. The CEC is located at the Wisconsin Public Service Corporation corporate offices in Milwaukee, Wisconsin. As this facility is approximately 90 miles from the plant site, approval for operation of this facility was the subject of previous NRC review. The CEC was relatively compact, but provided sufficient room for emergency operations. The licensee stated that nearby offices could be rapidly vacated in the event that addicional space was required. The CEC room was clean and in an acceptable state of operational readiness.

Discussion with licensee personnel indicated that the dose assessment program was available on a Local Area Network system accessible in the CEC, as was a computer able to pole the Plant Process Computer System (PPCS) via modem. The computer can provide a hard-copy screen print which is similar in format to the reactor parameters contained on the reactor parameters board. Three commercial telephone lines were available in addition to the line for the PPCS modem line, and a two-digit line for joint communications with offsite authorities will be available in the future. Status boards were posted for the emergency organization, plant emergency status (reactor parameters), and a plume projection map was available. A large white board, a fold up chalk board, and a cork board were also available.

The corporate office also houses the nuclear engineering groups, so that all normal plant procedures, including Technical Specifications and Emergency Operating Procedures would be readily available. Plant Piping and instrumentation drawings, Final Safety Analysis Reports and other documentation are very readily available.

A review of a limited sample of records of communications checks, siren maintenance records and facility inventories did not indicate any significant problems. Siren operability records indicated that the harsh winter weather had adversely affected siren operability statistics. The licensee stated that they would review this concern and take action as necessary. No violations or deviations were identified.

## d. Training

4 . 4 .

Discussion with the lead EP trainer indicated that training for key emergency response personnel did not include training on the NRC or federal incident response programs. He was generally aware of the contents of the Regional Supplement to HUREG-0845, which details the concept of operations, incident response modes, and response team assignments for NRC Region III. However, the most recent copy of this Supplement could not be located. A review of the licensee's actions to address this issue will be tracked as an Inspection Followup Item (50-266/94007-01(DRSS); 50-301/94007-01 (DRSS)).

Discussion with the EP trainer indicated that a special lesson plan had been developed for Command and Control training. Lesson Plan LP2168 (ERCLP-94-1), Emergency Response - Team Problem Solving," Revision O, dated February 15, 1994, was reviewed. The purpose of this module was for team building and realization of Command and Control Skills to be used during emergency events. The module was innovative and appeared very worthwhile in building both team communication and command and control skills. A training session had been conducted on March 2, 1994, utilizing this lesson plan, with positive comments received during the training critique.

One individual with key management duties in the OSC (OSD) was interviewed. He was knowledgeable of his responsibilities and duties, and readily discussed the procedural and non-procedural aspects of the position.

An individual with Site Manager duties in the TSC was interviewed. He was knowledgeable, aware of applicable procedures and checklists. On questioning he was able to immediately locate and discuss the procedure for activating the Emergency Response Data System (ERDS). He was also aware that at this plant the primary responsibility for event classification remains in the TSC.

The critique report for the December 8, 1993, utility-only annual emergency preparedness exercise was reviewed in detail. As the exercise was not evaluated by an NRC regional evaluation team, the licensee arranged for additional evaluators from the Wisconsin Public Service Corporation and elsewhere.

Also reviewed was Quality Assurance Program Surveillance Report S-P-93-19 "1993 PBNP Emergency Plan Exercise Evaluation," and the critique records for the drill held August 8, 1993. No problem areas were identified.

No violations or deviations were identified.

## e. <u>Audits</u>

1.0

The Inspector reviewed Audit No. A-P-94-05, "Emergency Response Program," dated March 9, 1994, performed during February 21-25, 1994. This audit was performed by four individuals, including one individual with Emergency Preparedness experience from Commonwealth Edison. The audit concluded that the EP program was adequate and was being effectively implemented. The audit team found "adherence to the EP program in all major areas, including interfaces with State and local governments, training, drills and exercises, facilities, equipment, instrumentation and supplies, and procedure and program maintenance." No Condition Reports were associated with the audit, but nine observations/recommendations for improvement were included.

The audit was very complete and well detailed: the associated recommendations were well-founded. The addition of an individual with Emergency Preparedness technical expertise from another utility appeared to have greatly enhanced the overall audit effort.

Documentation indicated that the portion of the annual audit which pertained to the adequacy of the offsite interface had been sent to appropriate individuals in the State of Wisconsin Department of Health & Social Services, Bureau of Technical Hazards, and officials in Kewaunee and Manitowoc counties on March 31, 1994.

The 1994 audit of the EP program satisfied the requirements of 10 CFR 50.54(t) with respect to their scope. Records also indicated that the EP staff fulfilled the requirement to make relevant audit and surveillance results available to State and county officials.

No violations or deviations were identified.

## 4. Inspection Followup Items

Inspection followup items are matters which have been discussed with Wisconsin Electric management, will be reviewed further by the inspector, and involve some action on the part of the NRC, company or both. Followup items disclosed during the inspection are discussed in paragraph 3.d.

# 5. Exit Interview

The inspector held an exit interview on April 8, 1994, with those licensee representatives identified in Section 1 to present and discuss the preliminary inspection findings. Specific items discussed during the exit meeting are discussed below. The licensee indicated that none of the matters discussed were proprietary in nature.

Overall maintenance of the Emergency Preparedness program was excellent.

- Facilities were in a state of operational readiness.
- An innovative training module addressed aspects of Command and Control.
- A detailed exercise manual had been developed.

....

.

4

.

- The Corporate Emergency Center was inspected and found adequate.
- The 1994 audits and surveillances of the program satisfied the requirements of 10 CFR 50.54(t).
- Training of key response personnel needed to include aspects of the NRC incident response program as delineated in the RIII Supplement to NUREG-0845.