

DMB

June 15, 1982

In reply, please refer to LAC-8342

DOCKET NO. 50-409

Mr. James G. Keppler, Regional Administrator
U. S. Nuclear Regulatory Commission
Directorate of Regulatory Operations
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

PRINCIPAL STAFF	
✓ DIR	REGIS
D/D	PAO
A/D	SIO
DR&PI	
DESTI	
DEPOSITS	File

SUBJECT: DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR (LACBWR)
PROVISIONAL OPERATING LICENSE NO. DPR-45
SIGNIFICANT INSPECTION FINDINGS - SHIFT AUGMENTATION

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- REFERENCES:
- (1) NRC Letter, Keppler to Linder, dated May 21, 1982
 - (2) DPC Letter, Linder to Crutchfield, LAC-8351, dated June 15, 1982
 - (3) DPC Letter, Linder to Crutchfield, LAC-8180, dated March 26, 1982

Dear Mr. Keppler:

Following a recent NRC Emergency Preparedness inspection it was determined that immediate corrective actions were required for significant inspection findings. Your letter Confirmatory Action Letter (Reference 1) requested that we take four actions, which are listed below with appropriate responses.

NRC Action

- 1. The licensee shall describe by position/title the number of personnel who can respond to the site in thirty and sixty minutes during off-shift hours and the job qualifications or performance capabilities of each of these individuals to meet the position described in NUREG-0654, Table B-1. This shall be completed by June 16, 1982.

DPC Response

- 1. DPC has submitted a request for exemption from NUREG-0654, Table B-1 (Reference 2). Attached is the modified Emergency Response Capabilities Table DPC has proposed. DPC does not feel that a radiological response team as large as specified in Table B-1 is necessary.

As discussed in Reference 3, the existing on-shift Health Physics Technician is qualified to perform both the radiation protection and radiation chemistry function. A boiling water reactor does not have the analytical chemistry requirements of a pressurized water reactor. The designation of a smaller emergency planning zone and the simplified chemical analysis tasks required in activation of the emergency plan lend themselves to fewer total personnel needed for emergency response.

In addition, the small size of the plant places relatively fewer demands on the radiation protection personnel. The compact plant layout minimizes survey times. The smaller core inventory reduces the possible magnitude of a radioactive release, and hence the distance of a survey team needs to travel. A computer program has been written for dose assessment to minimize the time the technicians need to spend on calculations. The Operations Department has been trained to assist the Health and Safety Department in radiological activities, such as surveying and post-accident sampling. For the above mentioned reasons, it is our opinion that a radiological response team of four individuals, three reporting to the plant and one to the Emergency Operations Facility will be sufficient.

The personnel listed for each function have been trained or will be trained by July 1, 1982 to perform at least the tasks for which they will be responsible. (e.g., The Assistant General Manager has functioned as Emergency Control Director in previous exercises and the Air Quality Analyst, listed under Radiological Activities, is capable of performing dose assessment).

Personnel notified of an emergency will respond to either the plant or Emergency Operations Facility, as directed.

NRC Action

- 2. The licensee shall describe the method by which he can assure notification of the staff such that they can augment the on-shift staff within thirty and sixty minutes. This method shall include provisions for thirty and sixty minute augmentation on holiday weekends.*

This shall be completed by June 16, 1982.

DPC Response

2. DPC believes that enough individuals reside near the plant and EOF to provide an adequate response team in case of an emergency. A phone list of personnel capable of performing emergency response functions will be maintained which will list approximate travel times from their residences to the plant or EOF, as appropriate. An automatic or improved dialing system will be used to expedite notification of desired individuals. When plant problems have occurred on backshifts and holiday weekends, in almost

all cases a sufficient number of individuals have been obtained. Based on past experience and the results of the test discussed under Item 3, we contend that an adequate number of individuals could augment on-shift personnel in the event of an emergency within specified time frames.

As an additional measure, a group of key individuals will be assigned radio-telephone pagers to increase the probability of their notification in case of emergency. Also, the Shift Technical Advisor would be able to activate the Technical Support Center prior to arrival of augmenting personnel, if deemed advisable.

We feel it is wiser to have only the necessary personnel at the plant during an emergency, so that unnecessary exposure is not received, confusion is minimized, and fresh people are available to relieve the initial emergency response team. We conclude this method of notifying only the individuals needed for response to the specific emergency to be superior to a common notification scheme, because it is not in the best interests of the health and safety of utility personnel or the public for a large number of people to report automatically to the plant during a major emergency.

NRC Action

3. *Administrative tests or drills shall be conducted to demonstrate that the thirty and sixty minute shift augmentation pursuant to NUREG-0654 can be met.*

This shall be completed by June 16, 1982.

DPC Response

3. An unannounced test of augmentation capabilities was conducted the night of June 14, 1982. Personnel were asked by telephone their approximate response times but were not required to report to the plant or EOF. The number of individuals capable of performing the specified function was as follows:

<u>FUNCTION</u>	<u>RESPONSE TIME</u>	
	<u>< 30 MINUTES</u>	<u>30-60 MINUTES</u>
Emergency Control	3	
Notifications/ Communications	3, plus additional available on-site	
Radiological Activities	11	4
Technical Support	6	1
Repair and Corrective Actions		
Instrument & Electrical	3	
Mechanical Maintenance	1	2
TOTAL	<u>27</u>	<u>7</u>

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Telephoning individual numbers did take approximately 1 hour, but an automatic or improved dialer and an organized phone list will considerably reduce the notification time.

The results of this test showed that not only could DPC augment on-shift personnel in accordance with their proposed modified Emergency Response Capabilities Table, but also in accordance with Table B-1 of NUREG-0654.

NRC Action

4. *The licensee shall submit a report to the NRC, Region III Regional Administrator by June 16, 1982, describing the results of all of the above actions.*

DPC Response

4. This letter constitutes the required report of DPC actions on the above items. The planned implementation date for the actions listed under Item 2 is July 1, 1982. The capabilities will be maintained when the plant is in Operational Conditions 1, 2 and 3.

It is our conclusion that our proposed emergency response capabilities as presented in this letter meet the intent of NUREG-0654 for the protection of the public.

If there are any questions concerning this letter, please contact us.

Yours truly,

DAIRYLAND POWER COOPERATIVE

Frank Linder/ee

Frank Linder, General Manager

FL:LSG:eme

Attachment

cc: NRC Resident Inspector

EMERGENCY RESPONSE CAPABILITIES DURING OPERATIONAL CONDITIONS 1-3

EMERGENCY RESPONSE FUNCTION	NORMAL POSITION	ON-SHIFT	REMAINING PERSONNEL RESIDING NEAR APPLICABLE EMERGENCY RESPONSE FACILITY (PLANT OR EOF)			PLANNED INITIAL RESPONSE TEAM (AS NEEDED)		
			30 MIN	60 MIN	TOTAL	30 MIN	60 MIN	TOTAL
Plant Operations	Shift Supervisor (SRO) Reactor Operators Plant Operators	1 2 2						
Emergency Control	Shift Supervisor Asst. General Manager - Power or Alternates	1	4		4		1	1
Notification - Communications	Security Guard Supervisor, Technicians and Specialists trained in Emergency Communications	1	5	3	8	1	2	3
Radiological Activities In-Plant Surveys On-Site Surveys Off-Site Surveys Dose Assessment Radiation Protection Radiological Assessment	Health Physics Technicians Radiation Protection Eng. Rad. Prot. Eng. Specialist Health & Safety Supervisor Health Physics Technicians Environmental Engineer Sr Environmental Biologist Air Quality Analyst Director, Environ. Affairs	1*	7*	5*	12*	2	2	4

*Operators are also trained to perform surveys and can be used for augmentation if necessary. There are generally 20 operations personnel not on-duty at anytime.

EMERGENCY RESPONSE CAPABILITIES DURING OPERATIONAL CONDITIONS 1-3

EMERGENCY RESPONSE FUNCTION	NORMAL POSITION	ON-SHIFT	REMAINING PERSONNEL RESIDING NEAR APPLICABLE EMERGENCY RESPONSE FACILITY (PLANT OR EOF)			PLANNED INITIAL RESPONSE TEAM (AS NEEDED)		
			30 MIN	60 MIN	TOTAL	30 MIN	60 MIN	TOTAL
Technical Support	Shift Technical Advisor Plant Superintendent Asst. Plant Superintendent Operations Supervisor Asst. to Operations Sup. Shift Supervisors Reactor Engineer Operations Engineer Electrical Engineer Mechanical Engineer Technical Support Engineer Engineer Assistant Engineering Specialist Director Power Production Director Power Engineering	1	9	5	14	1	2	3
Repair and Corrective Actions	Operators and Shift Supervisor Instrument & Elec. Supv. Mech. Maint. Supv. Maintenance Mechanics Instrument Technicians Electricians	(See Plant Oper)	10**	10**	20**	2	3	5
Firefighting		Fire Brigade per Tech. Specs.	Local Support					

**Includes Instrument Technicians who may be augmenting in communicator function.

EMERGENCY RESPONSE CAPABILITIES DURING OPERATIONAL CONDITIONS 1-3

EMERGENCY RESPONSE FUNCTION	NORMAL POSITION	ON-SHIFT	REMAINING PERSONNEL RESIDING NEAR APPLICABLE EMERGENCY RESPONSE FACILITY (PLANT OR EOF)		PLANNED INITIAL RESPONSE TEAM (AS NEEDED)	
			30 MIN	60 MIN	30 MIN	60 MIN
			TOTAL		TOTAL	
Rescue Operations and First-Aid		On-Shift Personnel				
Site Access Control and Personnel Accountability		Per Security Plan	Local Support			
Total		8	28	20	6	10
						16