

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-409/82-06(DEPOS)

Docket No. 50-409

License No. DPR-45

Licensee: Dairyland Power Cooperative
2615 East Avenue - South
LaCrosse, WI 54601

Facility Name: LaCrosse Boiling Water Reactor

Inspection At: Genoa, WI

Inspection Conducted: May 10-14, 1982

Enforcement Conference: July 23, 1982

Inspectors: *Jesse A. Pagliaro*
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Inspection Summary

Inspection on May 10-14, 1982 (Report No. 50-409/82-06(DEPOS))

Areas Inspected: Routine, announced inspection to review action taken in response to the Immediate Action Letter from Mr. J. G. Keppler to Mr. F. W. Linder dated July 28, 1981, and to the Emergency Preparedness Appraisal "Significant Appraisal Deficiencies," "Appraisal Improvement Item," the Emergency Plan Review and the Open Items sent by letter dated October 29, 1981, from Keppler to Linder. The inspection involved 112 inspector-hours onsite by two NRC inspectors and one consultant.

Results: Two apparent items of noncompliance were identified (inadequate shift staff augmentation capability - Paragraph 3; inadequate meteorological measurements procedures - Paragraph 4.

DETAILS

1. Persons Contacted

- *J. Taylor, Assistant General Manager - Power
- *R. Shimshak, Plant Superintendent
- *J. Parkyn, Assistant Plant Superintendent
- *T. Steele, Director Environmental Affairs
- *R. Brimer, Electrical Engineer
- *L. Goodman, Operations Engineer
- *P. Shafer, Emergency Plan Coordinator and Radiation Protection Engineer
- *E. Hennen, Environmental Engineer
 - G. Joseph, Security Director
 - B. Zibung, Health and Safety Supervisor
 - H. Towsley, Director, Quality Assurance
 - L. Kelley, Training Supervisor
 - R. Christians, Licensed Senior Reactor Operator

*Denotes those present at the exit interview.

2. Scope of the Inspection

This inspection was conducted to follow up on deficiencies identified during the Emergency Preparedness Implementation Appraisal conducted July 13-24, 1981. These deficiencies were documented in letters from J. G. Keppler to F. W. Linder dated July 28, 1981, and October 29, 1981, along with IE Inspection Report No. 50-409/81-13.

3. Augmentation of the Onsite Emergency Organization and Minimum Shift Staffing (Open Item 409/81-13-02)

The findings of the Emergency Preparedness Implementation Appraisal conducted July 13-24, 1981, were enclosed in a letter sent to the licensee and dated October 29, 1981. IE Inspection Report No. 50-409/81-13 was enclosed with the letter. Appendix A to the letter, "Significant Appraisal Findings," identified the following as a significant deficiency: "Adequate compensatory measures for minimum shift staffing and augmentation as specified in NUREG-0654, Table B-1, have not been addressed nor has an acceptable shift augmentation system been developed to test it."

The licensee was told in the letter that in accordance with the provision of 10 CFR 50.54(s)(2), should the deficiencies in Appendix A not be corrected within four months of the date of the letter, the Commission will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate.

The licensee responded to this NRC letter in a letter dated December 17, 1981, from Frank Linder, General Manager, to James G. Keppler. The licensee's letter stated that Attachment No. 1 described the actions in progress or planned to correct "Significant Appraisal Deficiencies,"

as indicated in Appendix A of the NRC letter. Attachment 1 to the licensee's letter stated in part that an augmentation procedure would be developed and implemented by February 28, 1982. The licensee also stated that they believed their present LACBWR staffing levels to be sufficient to meet the intent of Table B-1.

During this inspection, the inspectors reviewed licensee procedures to determine if a shift augmentation system or procedure had been developed and implemented. Neither Emergency Plan Procedure, EPP-2, dated March 17, 1982, entitled "Organization and Operations During Emergencies" nor any other licensee emergency plan procedure provided an acceptable shift augmentation system. An acceptable system would include the following:

- a. Prioritization for the order in which key persons by title and function are to be called.
- b. A system for assuring key persons are available, such as an administratively controlled duty roster.
- c. Provisions for notifying key personnel such that they can be alerted and report to their respective job locations within the prescribed thirty and sixty minute required reporting times. Page units, call down telephone system or tone alert radios would be provided.
- d. A duty officer system to assure a key person would be available for receiving initial communications.
- e. An order of succession for key positions.
- f. Provisions for calling in persons by position/title and the job qualifications or performance capabilities of each of the individuals.
- g. Provisions for testing and demonstrating the shift augmentation procedure on a periodic basis.

The licensee's failure to develop and test a system for timely augmentation of the onsite organization during a response to an emergency is noncompliance with 50.54(q) and 50.47(b)(2). Since this matter was not corrected within four months of the date that the original finding was provided to the licensee, as the licensee stated would be done, enforcement action is appropriate pursuant to 50.54(s)(2).

In response to the licensee's statement in their December 17, 1981, letter that they believed their proposed minimum shift staffing levels to be sufficient, the NRC Region III office responded in a letter dated February 5, 1982, as follows:

The minimum shift staffing proposed in your response is unacceptable because it does not meet the guidance recommended in NUREG-0654, Table B-1 i.e., you do not provide a SRO-Foreman, a

Rad/Chem Tech, nor a Communicator. We understand that you intend to request an exemption from the guidance in Table B-1. Until the exemption is approved, your minimum shift staffing is unacceptable and inadequate compensatory measures are in place.

The licensee has requested an exemption be granted from minimum shift staffing as specified in Table B-1 of NUREG-0654 by letter to Mr. Dennis M. Crutchfield, NRR, from Mr. Frank Linder, DPC, dated June 15, 1982.

Other staffing addressed in the licensee's revised Emergency Plan dated March 8, 1982, is still being reviewed and will be addressed in Region III's written review of the revised emergency plan. The adequacy of the licensee's overall staffing remains open.

One item of noncompliance was identified in this area.

4. Accident Assessment-Meteorological System

The findings of the Emergency Preparedness Implementation Appraisal conducted July 13-24, 1981, were enclosed in a letter sent to the licensee and dated October 29, 1981. IE Inspection Report No. 50-409/81-13 was enclosed with the letter. Appendix A, to the letter, Significant Appraisal Findings, identified the four items as significant deficiencies in the meteorological systems used in accident assessment.

The licensee was told in the letter that in accordance with the provision of 10 CFR 50.54(s)(2), should the deficiencies in Appendix A not be corrected within four months of the date of the letter, the Commission will determine whether the reactor shall be shut down until such deficiencies are remedied or whether other enforcement action is appropriate.

The licensee responded to this NRC letter in a letter dated December 17, 1981, from Frank Linder, General Manager, to James G. Keppler. The licensee's letter stated that Attachment No. 1 described the actions in progress or planned to correct "Significant Appraisal Deficiencies," as indicated in Appendix A of the NRC letter. The following items in this area were reviewed:

a. Backup Meteorological Data (Open Item 409/81-13-22)

Deficiency

"Procedures for obtaining meteorological data if primary measurements are not available have not been provided. Techniques for obtaining and utilizing backup information should be described in detail for both elevated and ground level-releases. Identification and utilization of backup data should be consistent in all plant emergency procedures."

Licensee Response

"EPP-5 will be reviewed to determine the feasibility of using nearsite monitoring stations as a source of backup, or secondary meteorological data. Secondary meteorological sites will be identified (e.g., Alma-6) and included in EPP-5 by February 28, 1982."

Inspection Finding

EPP-5, "Estimate of Offsite Exposure," dated July 31, 1981, was reviewed as part of this inspection. The licensee did not meet the commitment date for upgrading the procedure by February 28, 1982. EPP-5 does not contain procedures for obtaining meteorological data if primary measurements are not available nor is there a procedure for this function elsewhere. Although the emergency plan (page D-12) refers to the availability of alternative data sources, the procedures to obtain and utilize the information are not available. Backup information has not been made available twenty-four hours per day.

- b. Meteorological Equipment Quality Control (Open Item 409/81-13-23)

Deficiency

"Written procedures for calibration, operability checks, and maintenance of the onsite meteorological measurements program are not adequate."

Licensee Response

"Improved written procedures containing requirements for calibration, operability checks and maintenance of the onsite meteorological measurements is being prepared. The procedures will be implemented by April 1, 1982."

Inspection Findings

At the time of the following inspection, May 10-14, 1982, procedures were being prepared by a consultant to the licensee. An approved set of procedures was to be available by the end of May 1982. The procedure was not available during this inspection, exceeding four months beyond the October 29, 1981, letter.

- c. Utilization of Meteorological Data (Open Item 409/81-13-24)

Deficiency

"The meteorological procedures (EPP-5 and EPP-8) do not consider both elevated and ground level releases and the meteorological procedures do not include provision for obtaining and utilizing backup data. The technical basis for utilizing back-up data should be provided in a document separate from the procedures."

Licensee Response

"EPP-5, "Estimate of Offsite Exposure," has been revised as of July 31, 1981, to consider the effects of both elevated and ground level releases. The computer model also has the capability to consider both elevated and ground level releases."

Inspection Finding

During the followup inspection it was learned that EPP-5 contains worksheets to evaluate atmospheric dispersion conditions for both elevated and ground level releases. However, no averaging times are specified for wind speed, wind direction, and vertical temperature gradient. Provisions for obtaining and utilizing backup wind speed and wind direction data are not included. EPP-8, "Offsite Radiological Survey," considers only upper level wind information. EPP-5 and EPP-8 should be consistent with respect to meteorological information being used and should consider both elevated and ground level releases and appropriate backup information. The procedure EPP-5 has an issue date of July 31, 1981. The licensee committed to revise the procedure by February 28, 1982. This was not done. The technical basis for utilizing backup data has not been provided in a document separate from the procedures.

- d. Revision of Procedures to Incorporate Meteorological Information (Open Item 409/81-13-25)

Deficiency

"Provisions for obtaining and utilizing meteorological information beyond that used in an initial dose assessment have not been identified. Further, data sheets Nos. 1 and 2 (EPP-5) do not characterize release mode, nor consider 15-minute average meteorological conditions. These provisions should be consistent with EPP-8 as revised. The use of two Figure 3's in EPP-5 on Pages 9 and 15 leads to confusion in which one to use in performing calculations."

Licensee Response

"Provisions for obtaining and utilizing meteorological information beyond that used in the initial dose assessment is currently being evaluated. The applicable procedures and data sheets will be revised by February 28, 1982, following final determination of the specific methodology."

Inspection Finding

Although it was found that the licensee now has the capability to obtain and utilize meteorological information beyond that used in an initial dose assessment, procedure EPP-5, dated July 31, 1981, was not revised to correct the problems identified in the above

deficiency. The onsite meteorological system can be received at the corporate offices (near the EOF). Meteorological data will also be available in the TSC through a computer link by October 1, 1982.

Written emergency procedures for obtaining meteorological data in the TSC and at the EOF in the event of a computer malfunction do not exist. Any computer manipulation of meteorological data should include the capability to determine average conditions for at least 15-minute periods.

The licensee's failure to revise emergency procedures and systems to provide for backup meteorological information; provide for the calibration, operability checks, and maintenance of the onsite meteorological system; provide for the use of backup data in dose assessment procedures; and to revise EPP-5 and EPP-8 for consistency and to properly use the available data is noncompliance with 50.54(q) and 50.47(b)(9). Since this matter was not corrected within four months of the date that the original finding was provided to the licensee and the licensee stated would be done, enforcement action is appropriate pursuant to 50.54(s)(2).

One item of noncompliance was identified in this area.

5. Review of Immediate Action Letter Items (Letter J. G. Keppler to F. W. Linder July 28, 1981)

(409/81-13-35)(Closed) (Accident Assessment)

Deficiency: The meteorological temperature difference display in the control room was inoperable.

Inspection Finding: The licensee had the meteorological temperature difference display repaired by July 31, 1981.

(409/81-13-36) (Closed) (Accident Assessment)

Deficiency: There was not an existing procedure or posted conversion factors or graphs correlating the use of the containment monitor readings and the quantity of radioactive material released to this containment atmosphere.

Inspection Finding: The licensee has installed two containment dome monitors. They have been calibrated and are currently operational, Emergency Action Levels (EALs) based on dome monitor readings have been developed to classify accidents. The EALs are in Emergency Plan Procedure (EPP)-1.

(409/81-13-37) (Closed) (Assessment)

Deficiency: The procedure for projecting offsite doses did not allow for both ground level and elevated releases.

Inspection Finding: The licensee modified Procedure EPP-5 "Estimate of Offsite Exposures" by July 31, 1981, to include ground level and elevated releases.

6. Review of Significant Appraisal Deficiencies (Appendix A of October 29, 1981, letter)

(409/81-13-01) (Closed) (Assignment of Responsibility)

Deficiency: Documentation delineating the authority, responsibilities and limits on actions of Corporate Management Site Emergency Response Organization, and Contractor Organizations have not been provided. Further, the method of transferring the Emergency Control Director responsibility from the site to the EOF at the DPC headquarters in LaCrosse has not been specified.

Inspection Finding: The licensee has provided the required documentation in the March 8, 1982, Emergency Plan and in EPP-2; the Emergency Plan Implementing Procedure entitled, "Operation During Emergencies" dated March 17, 1982. This matter is considered closed.

(409/81-13-03) (Open) (Emergency Classification System)

Deficiency: The LACBWR Operating Manual, Non-routine and Emergency Operating Procedures did not reference the Emergency Plan Procedures (EPP) and activation of the Emergency Plan (EP).

Inspection Finding: Cross referencing of the LACBWR Operating Manual, Nonroutine and Emergency Operating Procedures with the EPPs and activation of the EP has commenced. This task will be completed prior to the end of the 1982 refueling outage.

(409/81-13-04) (Closed) (Emergency Classification System)

Deficiency: Initiating conditions in EPP-1 for Emergency Action Levels based on specific reading and on specific instrumentation were not sufficiently detailed to categorize an incident at the appropriate emergency level.

Inspection Finding: EPP-1 has been revised with sufficient detail. This item is closed.

(409/81-13-05) (Closed) (Notification Methods and Procedures)

Deficiency: The onsite warning siren and public address system could not be clearly heard in all areas of the plant and needs upgrading.

Inspection Finding: The onsite warning siren was re-aimed and tested in July 1981. The Public Address System (PA) was upgraded and tested. All areas of the plant were checked to ensure that either the siren and/or the PA system can be heard.

(409/81-13-06) Closed by Report No. 50-409/82-02.

(409/81/13-07) (Closed) (Emergency Communications)

Deficiency: Communications check procedure for portable FM radios at various locations in the Turbine Building and the Containment Building were not established.

Inspection Finding: The licensee has written and implemented a Procedure OP-81-01 "Portable Radio Testing" which describes communication check procedures for portable radios. This includes checking various locations in the turbine and containment buildings.

(409/81-13-08) (Closed) (Emergency Communications)

Deficiency: Dedicated voice communication links were not installed between the Control Room and TSC.

Inspection Finding: One pair of wireless radio battery powered headsets and one pair of dedicated FM handie-talkie voice radio transceivers with charger units are available for emergency communication between the Control Room and the TSC.

(409/81-13-09) (Closed) (Public Education and Information)

Deficiency: Procedures were not established specifying DPC staff assignments to the Joint Public Information Center (JPIC) and to the DPC staff, how media personnel will be contacted, Staff responsible for contacting the media and the order in which they are to be contacted.

Inspection Finding: EPP-16 "Public Education and Information" has been revised to specify who on the DPC staff is assigned as JPIC backup personnel; personnel duties and responsibilities; how the media will be contacted, by whom, and in what order.

(409/81-13-10) Closed by Report No. 50-409/82-02.

(409/81-13-11) (Closed) (Emergency Facilities and Equipment)

Deficiency: An inventory procedure was not provided for emergency kits to assure correct inventory including survey maps, replacement of dosimeters, portable lighting, and portable communications equipment.

Inspection Finding: A check list procedure has been developed for maintenance and inventory of emergency kits to assure availability of kits, emergency equipment, dosimeters, and supplies. Detailed county and USGS maps showing appropriate sampling locations, copies of EPP-8, portable lighting, and copies of preprinted survey forms were placed in the kits. The emergency kits are checked monthly. The check lists are signed off and filed in the Health Physics office. FM mobile radios have been placed in all LACBWR assigned DPC vehicles. A vehicle equipped with this radio will be available for use by offsite monitoring teams.

(409/81-13-12) (Closed) (Emergency Facilities and Equipment)

Deficiency: Portable air sampling equipment for field use was not provided for survey teams.

Inspection Finding: LACBWR has procured two Radeco-DC, 12V DC air samplers which were placed in the emergency sample kits. EPP-8 was revised to include the use of this equipment.

(409/81-13-13) (Open) (Accident Assessment)

Deficiency: A definitive emergency plan procedure for sample preparation and analysis of high activity samples was not provided.

Inspection Finding: EPP-6, Sample Collection and Analysis During Emergencies will be revised for high activity sample preparation and analysis. This will be accomplished as part of the post-accident sampling system modification. Completion will be accomplished by the end of the 1982 refueling outage in accordance with the licensee's commitment.

(409/81-13-14) (Closed) (Accident Assessment)

Deficiency: No procedure or EALs for use of the Area Radiation Monitor outside containment had been developed to determine quantity of radioactivity released into containment.

Inspection Finding: LACBWR has installed high range containment monitors as specified in NUREG-0737 Part II, F. 1, Attachment 3. This system is currently functional. EPP-1 includes the determination of EALs based on high range containment monitoring. This satisfies the above item.

(409/81-13-15) (Open) (Accident Assessment)

Deficiency: Capability and procedures for post-accident sampling and analysis of samples from the liquid effluent system had not been provided.

Inspection Finding: EPP-6 will be revised to include the capability and procedures for post-accident sampling and analysis of liquid effluents. Completion will be accomplished by the end of the 1982 refueling outage in accordance with the licensee's commitment.

(409/81-13-16) (Open) (Accident Assessment)

Deficiency: Procedures to obtain samples of stack effluent under accident conditions had not been developed.

Inspection Finding: EPP-6 will be revised to include the capability and procedures for post-accident sampling and analysis of stack effluents by the end of the 1982 refueling outage. Equipment installation for post-accident stack effluent was approximately 95% complete. This is in accordance with the licensee's commitment.

(409/81-13-17) (Closed) (Accident Assessment)

Deficiency: Displays in the control room of meteorological data appropriate for releases near ground level permitting easy determination of 15-minute averages of wind speed, wind direction, and an indicator of atmospheric stability have not been provided.

Inspection Finding: The licensee has installed strip chart recorders in the control room which provide continuous records of 10m wind speed and wind direction from a new 10m meteorological tower (see 409/81-13-19). An indicator of atmospheric stability is provided by a strip chart record of the measurement of vertical temperature gradient between the 10m and 106m elevations (see 409/81-13-18).

(409/81-13-18) (Closed) (Accident Assessment)

Deficiency: The digital display in the control room of instantaneous value of temperature difference will not allow determination of a 15-minute average.

Inspection Finding: The licensee has installed a strip chart recorder in the control room which provides a continuous record of the vertical temperature gradient between the 10m and 106m levels.

(409/81-13-19) (Closed) (Accident Assessment)

Deficiency: The 10 meter sensors have not been properly sited. Although no location on the LACBWR site is completely satisfactory for locating a 10 meter tower, the tower can be sited to reduce the building wake influence at the present location.

Inspection Finding: The licensee has installed a new 10m meteorological tower about 400 feet east of the containment structure. This tower is located in an area which is less affected by nearby structures and allows more representative measurements of low-level airflow than the previous location. Wind speed and direction are measured atop this tower, and ambient dry bulb temperature and the lower measurement of vertical temperature gradient are also measured at the 10m level of this tower. The tower became fully operational in late February 1982.

(409/81-13-20) (Closed) (Accident Assessment)

Deficiency: Emergency environmental sample preparation, analysis, and responsibility for performance were not provided. Responsibility for recovery and replacement of environmental TLDs were not provided.

Inspection Finding: EPP-8 has been revised to include procedures for environmental sample preparation, analysis, and responsibility for performance. EPP-8 also included provisions for recording and replacement of environmental TLDs.

(409/81-13-21) (Open) (Accident Assessment)

Deficiency: Procedures for high level sample preparation and analysis did not contain provisions for dilution or fractionation of samples to prevent excess MCA dead time.

Inspection Finding: EPP-6 will be revised to reflect consideration of dilution or sample fractionation. These changes will be performed as part of the Post-Accident Sampling System modification by the end of the 1982 refueling outage.

(409/81-13-26) (Closed) (Radiological Exposure Control)

Deficiency: An alternate assembly area offsite equipped for sheltering of site evacuees and outfitting of survey team has not been provided.

Inspection Finding: The licensee has established an alternate offsite assembly area in the St. Charles School, Genoa, Wisconsin. EPP-2 has been revised to reflect this change.

(409/81-13-27) (Open) (Radiological Exposure Control)

Deficiency: Procedures have not been provided for monitoring of all individuals leaving restricted areas at assembly areas and at reassembly areas.

Inspection Finding: A procedure which provides for all aspects of the Radiation Protection Program is currently under development. It will address monitoring of individuals at assembly areas and reassembly areas, as follows: action levels for decontamination; instrumentation to be used for personnel monitoring; provisions for recording the extent an individual is contaminated. This will be accomplished during the 1982 refueling outage. The licensee stated in their December 17, 1981, letter that this item would be completed by April 1, 1982, but intended completion by the end of the refueling outage. The licensee inadvertently did not change the date in their reply. The inspectors accepted the refueling outage date.

(409/81-13-28) (Open) (Radiological Exposure Control)

Deficiency: An Emergency Plan Procedure (EPP) that orchestrates all aspects of the Radiation Protection Program during an emergency was not provided.

Inspection Finding: The licensee has developed a procedure "Health Physics Department Emergency Response Actions" which identifies the health physics department activities required to support the emergency response effort. The procedure is currently undergoing review and modification to provide additional detail for the Health Physics technicians. The EPP will be completed during the 1982 refueling outage. The licensee stated in their December 17, 1981, letter that this item would be completed by April 1, 1982, but intended completion by the end of the refueling outage. The licensee inadvertently did not change the date in their reply. The inspectors accepted the refueling outage date.

(409/81-13-29) (Open) (Radiological Emergency Response Training)

Deficiency: Emergency Plan and Procedures training Programs do not include specific training in the contents of EPP-1, EPP-2 and the physical use of the EPPs.

Inspection Finding: EP training has been completed for 1981 and up to March 1982. Revision of EPP-14 will be completed during the 1982 refueling outage in accordance with the licensee's verbal commitment. The licensee stated in their December 17, 1981, letter that this item would be completed by April 1, 1982, but intended completion by the end of the refueling outage. The licensee inadvertently did not change the date in their reply. The inspectors accepted the refueling outage date.

7. Review of Appraisal Improvement Items. (Appendix C - October 29, 1981 letter)

There were 37 items which the Emergency Preparedness Appraisal Team felt should be considered for improvement by the licensee. Of these, 28 items have been completed. Nine items remain open and will be reviewed during a subsequent inspection.

8. Review of Open Items List (Appendix E of October 29, 1981, letter)

(409/81-13-30) (Open) Technical Support Center

Open Item: Adequate communications and ventilation controls were not available in the TSC in accordance with NUREG-0696. This is to be accomplished by October 1, 1982.

Licensee Action: The licensee has satisfied the communications requirements for the TSC. By letter of July 22, 1981, the licensee has indicated to NRR that they do not need ventilation controls in the TSC and therefore will not install same. The matter is being reviewed by NRR.

(409/81-13-31) (Open) Technical Support Center

Open Item: Data display (SPDS and other Regulatory Guide 1.97 parameters) were not made available to TSC personnel.

Licensee Action: The Licensee has not completed necessary action on this matter.

(409/81-13-32) (Open) Meteorological Instrumentation

Open Item: A complete description of the onsite meteorological measurements program to be used in the facility including the location and orientation of all sensors, sensor specifications, calibration and maintenance procedures, operability checks, data reduction techniques, and data displays has not been provided.

Licensee Action: This information has not been provided. This information is necessary to evaluate the adequacy of the meteorological measurements program and to ensure high quality, representative meteorological data are being appropriately utilized in accident assessments.

(409/81-13-33) (Open) Control Room

Open Item: The Control Room ventilation system has not been modified to permit Control Room habitability under accident conditions.

Licensee Action: The licensee has indicated to NRR by letter dated July 22, 1981, that they do not need ventilation controls in the control room for habitability and therefore will not install same. The matter is being reviewed by NRR.

(409/81-13-34) (Open) (Post-Accident Sampling)

Open Item: Primary coolant and containment atmosphere sampling systems required installation, testing, and development of procedures.

Licensee Action: Containment atmosphere sampling system installation was 100% complete. Procedures for use of the equipment were contained in LACBWR Operating Manual, Volume XI, Reactor Containment Building, revised December 1981.

Primary coolant sampling system equipment installation was approximately 60%-65% complete. Remaining equipment installation will be completed and procedures implemented for use by the end of the 1982 refueling outage.

(409/81-13-38) (Open) (Post-Accident Sampling)

Open Item: Post-accident liquid effluent sampling and analysis system required installation, testing, and development of procedures.

Licensee Action: Liquid effluent system pathways and sampling procedures are contained in HSP Procedures 7.1-7.9. Procedures for preparation and analysis of liquid effluent samples will be contained in the EPP-6 revision which will be completed by the end of the 1982 refueling outage.

(409/81-13-39) (Closed) (Area and Process Radiation Monitors)

Open Item: Operation and calibration of the SPING-4 monitor has not been completed.

Licensee Action: Health and Safety Procedure 2.16 describes the operation and calibration of the Eberline SPING 3/SPING 4 radiation monitors.

(409/81-13-40) (Closed) (Area and Process Radiation Monitors)

Open Item: Operational procedures for the high range containment radiation monitors have not been completed.

Licensee Action: LACBWR Operating Manual, Vol. X Health Physics Procedures, Section 5.4.4 describes the operation, functional, and operational checks of the high range containment monitors.

9. Exit Interview

The inspector met with licensee representative (denoted in Paragraph 1) at the conclusion of this inspection on May 14, 1982. The scope and findings of the inspection were summarized.

10. Management Enforcement Conference

On July 23, 1982, an enforcement conference was held between licensee representatives and NRC representatives in the NRC Region III office. The principal participants in the conference were:

- Mr. Frank Linder, General Manager, DPC
- Mr. James Taylor, Assistant General Manager, DPC
- Mr. John Parkyn, Superintendent, DPC
- Mr. James G. Keppler, Regional Administrator, NRC, RIII
- Mr. A. B. Davis, Deputy Regional Administrator, NRC, RIII
- Mr. C. J. Paperiello, Chief, Emergency Preparedness and Program Support Branch, NRC, RIII
- Mr. W. L. Axelson, Chief, Emergency Preparedness Section, NRC, RIII
- Mr. J. A. Pagliaro, Emergency Preparedness Section, NRC, RIII

During the conference the emergency preparedness enforcement history of DPC was discussed along with the items of noncompliance identified during the May 10-14, 1982, inspection. The licensee stated that appropriate corrective actions with respect to issuance of approved procedures covering shift augmentation and meteorological information would be completed by August 1, 1982. Additionally, the licensee believes with a new management effort their regulatory performance will be improved.