

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-263/94005(DRSS)

Docket No. 50-263

License No. DPR-22

Licensee: Northern States Power
414 Nicollet Mall
Minneapolis, MN 55401

Facility Name: Monticello Nuclear Generating Plant

Inspection At: Monticello Site, Monticello, MN

Inspection Conducted: April 18-22, 1994

Inspectors: R. D. Jickling
R. D. Jickling

5/26/94
Date

J. E. Foster
J. E. Foster

5/26/94
Date

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

5/27/94
Date

Inspection Summary

Inspection on April 18-22, 1994 (Report No. 50-263/94005(DRSS))

Areas Inspected: Routine, announced inspection of the Monticello Plant's emergency preparedness (EP) program. Aspects of the operational status of the EP program (IP 82701) were reviewed by two inspectors.

Results: No violations or deviations were identified. Overall maintenance of the operational status of the EP program was excellent. Facilities were in a state of operational readiness. The 1993 audits and surveillances of the program satisfied the requirements of 10 CFR 50.54(t), while 1994 audit activities were ongoing.

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DETAILS

1. Persons Contacted

Northern States Power Company

- *J. Holthaus, Emergency Planner
- *M. Offerdahl, Corporate Emergency Planning
- *M. Davis, Emergency Planner
- *K. Jepson, Superintendent, Chemistry
- *M. Hammer, Acting Plant Manager
- *M. Anderson, Technical Instructor
- *R. Brevig, Superintendent, Security and Emergency Planning
- T. LaPlant, Sr. Technical Instructor
- D. Horgen, Superintendent, Emergency and General Training
- *B. Day, Manager, Training Services and Special Programs

The above licensee staff attended the entrance meeting or the exit interview on April 22, 1994. The inspectors also contacted other licensee personnel during the inspection.

* Denotes those attending the exit interview.

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

(Open) Inspection Followup Item No. 50-263/93009-01: During the 1993 exercise, it was noted that it was difficult to determine the release flowrate from the containment Hard Pipe Vent, and estimate doses from hard pipe venting operations. Discussion with licensee personnel and a demonstration of the revised Meteorological Information and Display Assessment System (MIDAS) indicated that this system can now perform dose projections based on hard pipe venting operations. Guidance on when to initiate hard vent operations is contained in Emergency Operations Flowchart C.5.1-1200, Part N, as defined in C.5.1-1200, "Primary Containment Control". The EOP flow chart refers the operator to a containment pressure chart which indicates that containment venting should start before containment drywell pressure reaches 56 psig. Guidance was silent as to when to cease venting operations. Discussion indicated that the operators would cycle venting operations on and off as pressure approached 56 PSIG, and that termination of such venting operations would be subject to evaluation in the Technical Support Center. Cautions or concerns (such as maximum venting cycles and reliability of the vent valves) were not found. Additional guidance appeared worthwhile and this item will remain open.

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

a. Actual Activations of the Emergency Response Plan

There had been no actual activations of the licensee's Emergency Plan at the Monticello site since the last routine inspection conducted in late February, 1993.

No violations or deviations were identified.

b. Emergency Plan and Implementing Procedures

A number of procedures had been revised to make them consistent with the revised 10 CFR Part 20, and EPA-400 guidance. A selective review of a small sample of Emergency Plan Implementing Procedures (EPIPs) which had been recently revised did not indicate any problem areas.

In December 1993, the licensee discovered that revised procedure, Emergency Plan Implementing Procedure (EPIP) 001, "Emergency Organization", Revision 38, which was to be transmitted to NRC Region III would not be received within 30 days. The licensee contacted the inspector and expedited retransmittal of the procedure. Licensee actions to preclude similar failures were reviewed and found to be adequate. These changes included addressing corrections on the Document Control Distribution System manifest, initiation of an Emergency Plan (EPlan) and EPIP Revision Tracking Index, and the addition of a daily check of the status of EPlan and EPIP revisions.

Discussions indicated that a number of housing developments were in progress in the Emergency Planning Zone (EPZ). One such development is anticipated to encompass 700 housing units when completed; a second development could be considerably larger. Discussion indicated that the licensee plans to evaluate whether these increases in the EPZ population warrant any changes in the currently utilized Evacuation Time Estimates.

Letters of agreement with offsite agencies and corporations were reviewed for current dates. The Corporate Nuclear Emergency Plan (Revision 10), Section 2, "Concept of Operations" addresses letters of agreement, but does not specify when such letters are to be updated. Several of the letters of agreement will be two years old as of late April 1994.

No violations or deviations were identified.

c. Emergency Response Facilities, Equipment, and Supplies

The Technical Support Center (TSC), Operations Support Center (OSC), and Emergency Operations Facility (EOF) were toured and found to be as described in the plan and implementing procedures.

Current copies of the implementing procedures (EIPs) were located in the OSC, Control Room, TSC, and alternate shutdown panel area. The Emergency Notification System telephone lines were verified operational in the EOF, TSC, and Control Room. The "State EOC hotline" was verified operational in the TSC.

The area previously utilized as the dedicated OSC is now utilized as office space for two individuals. Whether or not this arrangement is acceptable is to be determined in the next major drill.

A test of the Emergency Response Data System (ERDS) was successfully conducted during the TSC tour. The ERDS system can be initiated from three terminals in emergency response facilities, or any VAX terminal. The procedure for initiating ERDS is extremely simple, involving signing on to either of two computer subsystems and typing "ERDS" and a password.

All facilities toured were in an excellent state of operational readiness. Major changes had not taken place since the last routine inspection.

The dose assessment program had been upgraded to the current revision of the MIDAS system. The new program provided for a segmented plume model rather than a straight-line Gaussian plume and provided calculations consistent with current 10 CFR Part 20 and EPA-400 guidance. The program can also perform dose projections based on a containment hard pipe venting evolution. The inspectors observed a demonstration of the new MIDAS program, with no problems identified.

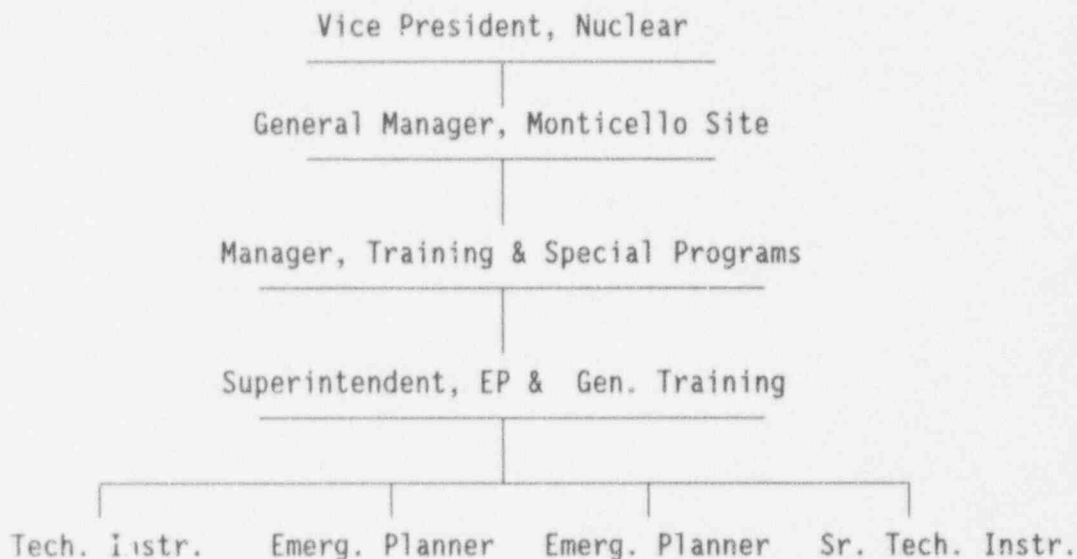
The Public Alert Notification System (PANS) Siren Trend Report dated December 1, 1993 was reviewed. The report indicates that the siren monthly operability for December was 96.30% and siren year-to-date operability was 95.99%. These figures exceed the 70% monthly operability and 90% yearly acceptance criteria. The report also notes that improved lightning protection for the sirens has been approved.

Discussions with the licensee regarding the Emergency Filter Train (EFT) modifications starting in July through October 1994, identified a potential impact on the TSC. The impact on the TSC during these modifications would be minimal except in specific emergency situations that would affect TSC habitability, such as a radiological release. Were the TSC to become uninhabitable, emergency procedures identified appropriate actions and relocation to the alternate TSC. The licensee agreed to notify the Headquarters Operations Officer and the Regional Emergency Response Coordinator of the potential use of the alternate TSC due to the EFT modifications in the event of an emergency, modifications start date, and modifications completion date.

No violations or deviations were identified.

d. Organization and Management Control

The current organizational structure of Emergency Preparedness at the Monticello site was as depicted below. The Manager, Training and Special Programs was currently on a one year assignment to work on creating task analyses and other projects to make emergency training consistent with training programs accredited by the Institute for Nuclear Power Operations (INPO).



e. Training

Lesson Plan M7425L-003, "Emergency Manager Initial", and Lesson Plan M7425L-004, "Emergency Manager, Emergency Plan - Continuing" were reviewed. This training is estimated to require two hours, covering the basic duties and responsibilities of the Emergency Manager. Review of the lesson plans and discussion indicated that training of key response individuals in the TSC and EOF did not include training on the NRC or other federal agencies incident response programs. The NRC has a highly detailed incident response program, with various groups having the lead for the agency at various times, depending on the agency response mode. Knowledge of this information would be important for key licensee decision makers.

Memoranda from late 1991 indicated that incorporation of relevant NRC Incident Response Program information into select site Emergency Response Organization training had been planned, but never completed. Licensee personnel indicated that relevant information would be added to the training of key personnel in the TSC, EOF, and HQEC. A subsequent review of this area will be tracked as an Inspection Followup Item (No. 50-263, 50000101(DRSS)).

The Emergency Plan Exercise Critique Report for the June 8, 1993 exercise was reviewed. The report was highly detailed and complete. The copy reviewed had been hand-annotated to indicate which items had been considered as sufficiently significant for corrective action(s). The Emergency Plan Drill Critique Report for the April 27, 1993 drill was reviewed. No problems were noted.

Documentation for the May 13, 1993, routine quarterly Emergency Response Organization Augmentation Test was reviewed. This was an unannounced, off-hours activation of the pager network and ERO call-lists for Engineering, Maintenance, Operations, Radiation Protection, Training Center and Technical Support Groups. Staffing deficiencies were noted for Electrical Maintenance, Radiation Protection, and Electrical Engineer/I & C staffing. Corrective actions were proposed to improve overall augmentation responses. The report for an augmentation test conducted on October 25, 1993, indicated no staffing deficiencies, but fewer than expected Operations personnel responded. A similar report for a test held on February 3, 1994 was also reviewed. No staffing deficiencies were noted for either the 30 or 60 minute staffing criteria, and all but one responder indicated that they met the site Fitness For Duty policy at the time they were notified of the test.

No violations or deviations were identified.

f. Audits

Audit AG 93-04-06, "Emergency Preparedness (10 CFR 50.54(t))" dated March 24, 1993 was reviewed. This audit pertained to the Headquarters Emergency Center (HQEC) and the Prairie Island and Monticello sites and was conducted by two auditors between January 19 - March 23, 1993. The scope of this audit included verification of implementation in facility readiness, training, and capabilities and procedures. The audit resulted in one Finding (F_u 93-10) and one Deficiency (DG 93-12), both related to aspects of training, and a total of 24 recommendations. The audit concluded that "activities audited in the area of Emergency

Preparedness are effectively implemented." The audit was very complete and very well detailed.

Audit AG 92-42-06, "Emergency Preparedness Interface with State and Local Governments", dated January 5, 1993, and conducted by two auditors during December 14-30, 1992 was reviewed. The audit was focused on interviews of individuals from four county agencies, the City of Red Wing, State of Minnesota, State of Wisconsin, and both State health departments. Questions to be utilized in the interview process were developed prior to the interviews to evaluate the areas of communications, notifications, and adequacy of support. In addition, each participant was asked

to grade the interface on a scale of 1 to 10, an innovative approach. The audit did not result in any findings or deficiencies, but contained four recommendations. The audit was well designed and highly detailed, containing a summary of important points made by those interviewed.

Power Supply Quality Assurance, Monticello QA Surveillance Report SR-MO-93-140, "Emergency Planning", conducted during April 15-20, 1993 addressed review of procedures A.2-802 and A.2-812 and associated EOF facilities. This was done by walking through these procedures at the EOF. Minor discrepancies were identified by the reviewers; these were quickly corrected.

The 1994 annual audit was in the final stages of completion during this inspection, and was not reviewed. Aspects of the 1994 audit and surveillance program were discussed with the lead auditor for the EP functional area.

Documentation regarding providing the portion of the 1993 annual audit which deals with offsite interface adequacy to offsite authorities was difficult to obtain, and dates of transmittal to the various agencies were unclear.

The 1993 and 1994 audits and surveillances 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 by including such results as a topic during periodic meetings with these officials.

The overall quality of the 1993 and 1994 audits was good. Heavy emphasis was placed on performance based auditor activities, such as observing drills and exercises, or ongoing periodic equipment inventories and operability tests.

No violations or deviations were identified.

4. Exit Interview

The inspectors held an exit interview on April 22, 1994, with those licensee representatives identified in Section 1 to present and discuss the preliminary inspection findings. The licensee indicated that none of the matters discussed were proprietary in nature.