

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report Nos. 50-277/83-01
50-278/83-01

Docket Nos. 50-277
50-278

License Nos. DPR-44 Priority -- Category C
DPR-50

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pennsylvania 19101

Facility Name: Peach Bottom Atomic Power Station

Inspection At: Delta, Pennsylvania

Inspection Conducted: January 10-14, 1983

Inspectors: *[Signature]* 3-9-83
Nemen M. Terc, Emergency Preparedness date
Coordinator

[Signature] 3-9-83
Ira Cohen, Emergency Preparedness date
Specialist

Approved by: *[Signature]* 3-9-83
H. W. Crocker, Chief, Emergency Preparedness date
Section

Inspection Summary: Inspection on January 10-14, 1983 (Inspection Report No. 50-277/83-01, 50-278/83-01)

Areas Inspected: Special announced follow-up inspection of emergency preparedness items from a prior appraisal performed on December 7-17, 1981 (Report No. 50-277/81-28 and 50-278/81-31). The inspection involved 72 inspector hours onsite by two regionally based NRC inspectors.

Results: Of the 7 Appendix A items resulting from the appraisal 4 were closed and 3 remain open. Of the 58 Appendix B items, 40 were closed and 18 remain open. Three (3) additional open items resulted from this inspection.

DETAILS

1. Persons Contacted

- G. Barley, Chemist
- * G. H. Gellrich, Site EPC
- * A. E. Hilsmeier, HP
- * R. A. Kankus, PECO - EPC
- * S. J. Kovacs, Administrative Engineer
- * G. P. McCarty, HP
- A. Nelson, HP
- G. Rombold, HP
- * K. W. Schlecker, Instructor - PECO
- * W. T. Ullrich, Station Superintendent
- * H. L. Watson, Plant Chemist

*denotes attendance at the exit interview.

2. General

During the period December 7-17, 1981, an NRC team conducted an appraisal of the State of Emergency Preparedness at the Peach Bottom Atomic Power Station, Units I and II. As a result, the NRC identified seven items requiring resolution in order for the licensee to achieve an adequate state of emergency preparedness and fifty-eight improvement items. These findings were documented in a letter to the licensee dated December 24, 1981, and in the NRC Inspection Report No. 50-277/81-28 and 50-278/81-31. In a letter dated February 2, 1982, the licensee made commitments to resolve all significant findings and improvement items. As a result of the present inspection, 44 items were closed, 21 items remain open and 3 new items requiring followup were added.

3. Licensee Actions on Previous Inspection Findings

- 3.1 (Closed) 277-81-28-58; 278/81-31-58 Develop and implement a method to ensure that updated emergency procedures are available for use when and where needed by all persons who have emergency response roles.
(Appendix A, item 1)

The inspector noted that the licensee's procedure A-2, "Administrative Procedure for control and use of documents," was implemented on December 15, 1982. This procedure provides a method to distribute and update emergency response documents so that they will be available for use.

- 3.2 (Open) 277/81-28-03; 278/81-31-03 Expand on your letter to the NRC, dated April 3, 1981, to describe how the shift personnel discussed in the letter will fulfill the intent of the functions listed in Table B.1 of NUREG-0654 for 30 minute augmentation.
- o Describe your plan for assuring that a plant staff manager will be onsite in about 60 minutes to assume the role of EOF Director.

- o Demonstrate by unannounced drills that additional specified persons in the proposed staffing plan can be onsite in about 60 minutes after initial notification. Records must be kept. (Appendix A, item 2)

The inspectors noted that in a letter dated June 4, 1982, the licensee further expanded on their response by shift personnel. However, augmentation was not in accordance with Table B.1 of NUREG-0654. This item will remain open until reviewed by the Office of Nuclear Reactor Regulation.

The inspectors also noted that the new revision of the Emergency Plan provided assurance that a plant staff manager would be onsite in about 60 minutes to assume the role of the EOF Director, and that unannounced drills were performed as requested.

- 3.3 (Open) 277/81-28-04; 278/81-31-04 Complete the development of, and formalize the emergency preparedness training program for Peach Bottom personnel having emergency response roles and for supporting personnel.
 - o Promptly conduct training to assure that several individuals are fully trained in each functional area described in the Peach Bottom emergency response organization.
 - o Complete initial training of other personnel. (Appendix A, item 3)

The inspectors reviewed the licensee's Emergency Preparedness training program and noted that although the program was being revised, it had not been completed. The licensee had conducted training before February 1, 1982 in accordance with the previous established training program and emergency response organization. The licensee is planning to complete and implement a new emergency preparedness training program that will reflect the present emergency response organization, by May 1, 1983.

- 3.4 (Closed) 277/81-28-01; 278/81-31-01 Prepare a job description for the Site Emergency Planning Coordinator position which describes the responsibilities and authorities for coordinating all emergency response planning and preparedness functions at the Peach Bottom Atomic Power Station. (Appendix A, item 4)

The inspectors noted that the licensee had established a Position Guide for the Site Emergency Planning Coordinator. The document described his responsibilities and authorities in the area of emergency preparedness.

- 3.5 (Closed) 277/81-28-30; 278/81-31-30 Review all emergency procedures to eliminate deficiencies and identify missing procedures. Issue revised and new procedures, as necessary. (Appendix A, item 5)

The inspectors noted that Emergency Procedures had been updated as needed.

- 3.6 (Closed) 277/81-28-02; 277/81-31-02 Clarify the emergency response organizational concepts (especially Table 5.4 of the Emergency Plan) to

show the EOF as the primary emergency coordination location (the TSC retains the primary responsibility for plant operations). All other organizations which provide support, including corporate organizations, will provide this support through the EOF Director. (Appendix A, item 6)

The inspectors noted that figure 5.3 of the Emergency Plan clarified the functions of the EOF as the primary emergency response location.

- 3.7 (Open) 277/81-28-12; 278/81-31-12 Perform an analysis of the stack sampling system to verify that samples are representative, and if they are not, provide a description of necessary remedial actions and a schedule for their completion. (Appendix A, item 7)

The inspectors reviewed the licensee's preliminary study and concluded that it did not contain sufficient data to show whether stack samples were representative and whether a correction factor was necessary in calculations pertaining to offsite effluent release. This item will remain open until a more conclusive study is accomplished by September 1, 1983.

- 3.8 (Open) 277/81-28-05; 278/81-31-05 Develop emergency preparedness instructor selection and qualification criteria. (Appendix B, item 1)

The inspectors noted that the licensee had not developed written selection and qualification criteria for emergency preparedness instructors, but intend to do so by May 1, 1983.

- 3.9 (Closed) 277/81-28-06; 278/81-31-06 Develop a procedure for emergency training of augmentation personnel during an emergency. (Appendix B item 2)

The inspectors noted that the licensee's procedure EP-307, "Reception and Orientation of Support Personnel," was implemented on April 12, 1982. The procedure defined actions needed for giving administrative and technical orientation to emergency support personnel.

- 3.10 (Closed) 277/81-28-07; 278/81-31-07 Increase the use of handouts and other instructional aids in emergency training classes. (Appendix B, item 3)

The inspectors attended a training session and noted that the licensee used handouts and other instructional aids.

- 3.11 (Open) 277/81-28-08; 278/81-31-08 Provide a backup method to verify the habitability of the TSC. (Appendix B, item 4)

The inspectors reviewed procedures and held discussions with the licensee and determined that habitability criteria for the emergency response facilities had not been developed, but that they intend to have them in place by April 1, 1983.

- 3.12 (Closed) 277/81-28-09; 278/81-31-09 Develop a procedure which reflects the current TSC which encompasses the EOF; activation of this singular facility; and a diagram of the working spaces in the TSC and EOF functions including equipment allocation. (Appendix B, item 5)

The inspectors noted that procedure EP 203, "Emergency Operations Facility (EOF) Activation," clarifies the activation, manning and operation of this emergency response facility.

- 3.13 (Open) 277/81-28-10; 278/81-31-10 Provide dedicated maintenance and radiation protection survey equipment within the primary OSC location. (Appendix B, item 6)

The inspectors noted that the licensee had not established provisions for assuring the availability of instruments for measuring direct radiation and airborne contamination in the Operational Support Center (OSC). The licensee will receive and have equipment available in the OSC by July 1, 1983.

- 3.14 (Closed) 277/81-28-11; 278/81-31-11 Provide a procedure and equipment for transporting post-accident reactor coolant samples to the laboratory to minimize the radiation dose to personnel. (Appendix B, item 7)

The inspectors noted that licensee's procedures EP 205A, "Chemistry Sampling and Analyses Group", and EP 205A.1, "Operation of Post Accident Sampling Station," provide adequate radiation protection guidelines.

- 3.15 (Closed) 277/81-28-14; 278/81-31-14 Provide a procedure to ensure safe transport of the exhaust stack air samples and cartridges. (Appendix B, item 8)

The inspectors noted that the licensee's procedure 205A.7 "Obtaining Particulate Samples from the Main Stack and Roof Vents following Accident Conditions" includes instructions to ensure safe transport of the exhaust stack air samples and cartridges.

- 3.16 (Open) 277/81-28-13; 278/81-31-13 Determine if the sample station in the base of the stack would be habitable during accident conditions. (Appendix B, item 9)

The inspectors held discussions with the licensee and concluded that the habitability of the sampling station at the base of the main stack during accident conditions had not been established. The licensee intends to resolve this item by May 1, 1983.

- 3.17 (Open) 277/81-28-15; 278/81-31-15 Develop a procedure for identifying locations and taking liquid effluent samples following an accident. (Appendix B, item 10)

The inspectors held discussions with the licensee and noted that although they had identified probable locations for sampling post accident

radioactive liquid waste, a definitive study had not been conducted and special sampling means had not been developed. The licensee intends to resolve this item by May 1, 1983.

- 3.18 (Open) 277/81-28-16; 278/81-31-16 Provide appropriate supplies to enable decontamination and record tracking for the number of persons that might be expected during an emergency. (Appendix B, item 11)

The inspectors noted that special provisions for radioiodine decontamination, replacement protective clothing and data sheets to record decontamination progress were not in place. The licensee intends to resolve this item by April 1, 1983.

- 3.19 (Closed) 277/81-28-17; 278/81-31-17 Document within the Emergency Plan those facilities planned for use for expanded support. (Appendix B, item 12)

The inspectors noted that Sections 7.1.8.3 - 7.1.8.5 of the Emergency Plan provides a description of facilities used for expanded support.

- 3.20 (Closed) 277/81-28-18; 278/81-31-18 Complete the installation of the telephone service in the Muddy Run News Center. (Appendix B, item 13)

The inspectors noted that the installation of the telephone service in the Muddy Run News Center had been completed and was tested during their annual emergency exercise on June 16, 1982.

- 3.21 (Closed) 277/81-28-19; 278/81-31-19 Include high range survey instruments in the emergency kits. (Appendix B, item 14)

The inspectors verified that the high range survey instrumentation (e.g., ion chambers RO-2A, RO-7) were in the emergency kits.

- 3.22 (Closed) 277/81-28-20; 278/81-31-20 Demonstrate and document the ability to detect radioiodine in the presence of noble gases and particulate radioactivity in the air as required by NUREG-0654. (Appendix B, item 15)

The inspectors held discussions with the licensee, reviewed calibration data and verified that SAM-II-sodium iodide, thallium activated crystal detectors were included in offsite sampling kits.

- 3.23 (Open) 277/81-28-21; 278/81-31-21 Include a list of those nonradiation process monitors within the Emergency Plan. (Appendix B, item 16)

The inspectors noted that the licensee had not included non-radiation process monitors in their Emergency Plan. The licensee intends to incorporate them in the new revision of their Emergency Plan due September 1, 1983. (See item 4.1 below.)

- 3.24 (Open) 277/82-28-22; 278/81-31-22 Document the procedures used for the inspection of the instrumentation in the control room and the meteorological towers and verify that these procedures are being followed. (Appendix B, item 17)

The inspectors noted that the licensee had not documented meteorological procedures at the time of the inspection. However, the licensee stated they would provide the means for documenting meteorological procedure uses. The licensee intends to resolve this item by May 1, 1983.

- 3.25 (Open) 277/81-28-23; 278/81-31-23 Provide quarterly calibration of the meteorological instrumentation as opposed to semi-annually. (Appendix B, item 18)

The inspectors discussed this item with the licensee and found that they were not aware of the requirements found in Section III 2A (Page 3-190) of NUREG 0737. The licensee agreed to change to a quarterly calibration of the meteorological instrumentation by May 1, 1983.

- 3.26 (Closed) 277/81-28-24; 278-31-24 Relocate the major storage site for emergency SCBA devices out of the main reactor buildings to areas of lower radiological hazard. (Appendix B, item 19)

The inspectors noted that the major storage site for emergency SCBAs had been relocated to areas of low radiological hazards (e.g., Unit 1 Administration Building).

- 3.27 (Closed) 277/81-28-25; 278-31-25 Relocate the refilling areas for emergency SCBAs out of the main reactor buildings to areas of lower radiological hazards. (Appendix B, item 20)

The inspectors noted that equipment for refilling SCBA bottles had been relocated to an area with a low radiological hazard (e.g., Unit 1 Administration Building)

- 3.28 (Open) 277/81-28-26; 278/81-31-26 Evaluate dedicated equipment needs for damage control, corrective action and maintenance, and the positioning of this equipment at specified locations for use during an emergency, and make changes where necessary. (Appendix B, item 21)

The inspectors held discussions with the licensee who stated that an informal evaluation had been made to evaluate equipment needs for damage control, corrective action and maintenance, but that formalization of the same had not been completed. The licensee intends to resolve this item by May 1, 1983.

- 3.29 (Open) 277/81-28-27; 278/81-31-27 Check the type of equipment that will be borrowed during emergencies from sister plants and supplied by RMC for compatibility with existing equipment. (Appendix B, item 22)

The inspectors noted that the licensee had not performed a study to establish the need for specific equipment and supplies necessary to augment their response capability during extended accidents situations, nor had established whether such equipment or supplies were compatible to that used by the plant. The licensee intends to resolve this item by May 1, 1983.

- 3.30 (Closed) 277/81-28-28; 278/81-31-28 Provide transportation from the main parking lot to the assembly area for potential stragglers during a site evacuation. (Appendix B, item 23)

The inspectors noted that the licensee had assigned sufficient vehicles for emergencies that would be used to transport stragglers.

- 3.31 (Closed) 277/81-28-29; 278/81-31-29 Obtain or designate sufficient vehicles to permit vital emergency functions to continue under any conditions. (Appendix B, item 24)

The inspectors noted that the licensee had sufficient four wheel powered vehicles to permit vital emergency functions to continue.

- 3.32 (Closed) 277/81-28-31; 278/81-31-31 Clarify the reporting requirements for a General Emergency and revise the procedures accordingly. This action is part of the overall procedure review identified as necessary for Section 5.1. (Appendix B, item 25)

The inspectors noted that reporting requirements for "General Emergencies" had been clarified in their April 14, 1982 revision of EP-317, "Direct Recommendation to County Emergency Management and Civil Defense Agencies".

- 3.33 (Open) 277/81-28-32; 278/81-31-32 Provide an implementing procedure to aid the person assigned the responsibility for coordination of assessment actions for trend analysis, for escalation or de-escalation, and for protective action recommendations. The procedure should guide this person to the correct actions when indicated by sample analysis and process instrumentation. (Appendix B, item 26)

The inspectors reviewed Emergency Implementing Procedures and concluded that procedures for orchestrating radiological assessment and protection actions had not been developed. The licensee intends to include this procedure in the overall revision of all their Emergency Implementing Procedures which is intended to be completed by September 1983. (See item 4.1 below).

- 3.34 (Closed) 277/81-28-33; 278/81-31-33 Provide radiation protection guidance to offsite teams surveying in the plume. (Appendix B, item 27)

The inspectors noted that radiation protection guidance to offsite teams surveying the plume were incorporated in the latest revision of procedure EP 205B, "Radiation Survey Groups".

- 3.35 (Open) 277/81-28-34; 278/81-31-34 Revise data sheets to include provision for: (1) recording the time of each survey, (2) duration of meter reading and (3) mode of operation in procedure EP-205B. (Appendix B, item 28)

The inspectors reviewed procedure EP-205B, "Radiation Survey Groups", and determined written provisions for recording the location of each survey, the duration of meter readings and mode of operation were lacking. The licensee intends to resolve this item by April 1, 1983.

- 3.36 (Closed) 277/81-28-35; 278/81-31-35 Identify, in procedure EP-205B, emergency equipment location for the onsite survey team. (Appendix B, item 29)

The inspectors noted that paragraph 3.1 of Procedure EP-205B stated that emergency kits would be located in the Emergency Operations Facility and that additional instruments could be obtained from the HP routine storage location.

- 3.37 (Open) 277/81-28-36; 278/81-31-36 Identify in procedure HPO/CO 66 sampling points for the site perimeter. (Appendix B, item 30)

The inspectors discussed the licensee's response in their June 4, 1982 letter to the NRC, and explained the practical advantage of pre-designated locations on the site perimeter. The licensee agreed to identify pre-designated locations by May 1, 1983.

- 3.38 (Closed) 277/81-28-37; 278/81-31-37 Provide for primary and backup communication methods within procedure EP-205B. (Appendix B, item 31)

The inspectors noted that means for primary and backup communications for radiation monitoring teams had been specified in the latest revision of procedure EP-205B.

- 3.39 (Closed) 277/81-28-38; 278/81-31-38 Revise procedure EP-205B to include radiation protection guidance for in-plant survey teams, methods or reference to procedure for use of all in-plant survey equipment, and listing of instrument(s) and type(s) of surveys to be completed by in-plant teams. (Appendix B, item 32)

The inspectors noted that the latest revision of EP-205B includes reference to Health Physics procedures pertaining to the use of the various in-plant radiation survey equipment and survey data sheets which included a space to denote specific instruments used.

- 3.40 (Closed) 277/81-28-39; 278/81-31-39 Provide an emergency plan implementing procedure for reactor coolant sampling for the current and/or the new system being installed to meet the NUREG-0578 requirements. (Appendix B, item 33)

The inspectors toured the facility and noted that a new sampling system had been installed for safely taking post-accident reactor coolant liquid samples, and reviewed procedures EP 205 A, "Chemistry Sampling and Analysis Group" and EP 205 A.1, "Operation of Post-Accident Sampling Station". The inspectors concluded that the procedures appeared to be adequate. However, see item 4.3.

- 3.41 (Closed) 277/81-28-40; 278/81-31-40 Provide an implementing procedure in the EP series that provides for: methods of analysis; the limitation of radiation levels to be applied to personnel and facilities; tracking of samples; reporting of data (keyed to emergency action levels) to the personnel responsible for assessment and protective actions; and escalation and de-escalation of the emergency classification. (Appendix B, item 34)

The inspectors reviewed procedure EP 205.A11 "Sample Preparation and Chemical Analysis of Highly Radioactive Liquid Samples" and concluded that radiological precautions were properly addressed. Instructions on communicating results back to the emergency organizational elements responsible for changing emergency classifications are included in EP 205A "Chemistry Sampling and Analysis Group". However, see item 4.3.

- 3.42 (Closed) 277/81-28-41; 278/81-31-41 Provide an emergency plan implementing procedure which includes the information contained in the HPO/CO procedures 121, 124 and 125. In addition, consideration should be given to providing a checklist, data sheets and provision for samples. (Appendix B, item 35)

The inspectors reviewed procedures EP-205A.2, "Obtaining Gas Samples from Containment Atmosphere Dilution Cabinets"; EP 205 A.3, "Retrieving and Changing Sample Filters and Cartridges from the Drywell Radiation Monitor During Emergencies"; EP 205A.4 "Obtaining Drywell Gas Samples from Drywell Radiation Monitor Sampling Station", and noted that there were no provisions for recording the data and uniquely identifying each sample. In addition, the means for transporting samples were not discussed, but will be incorporated in the new revision of the Emergency's Implementing Procedures by September 1983. (See items 4.1 and 4.3 below).

- 3.43 (Closed) 277/81-28-42; 278/81-31-42 Provide procedures in the EP series which address post-accident sampling analysis. The procedure should include checklists, data sheets, labeling of samples, and reporting of results. (Appendix B, item 36)

The inspectors reviewed procedure EP 205A.12, "Sample Preparation and Analyses of Highly Radioactive Particulate and Iodine Cartridges", and concluded that although it did not include checklists, data sheets and provisions for identifying samples, these items are included in procedure EPP 205A. However, see item 4.3.

- 3.44 (Closed) 277/81-28-43; 278/81-31-43) Provide an Emergency Plan Implementing Procedure for Sampling of the Exhaust Air Release Points which

integrates the sampling steps in HFU/CO-126 into the Emergency Procedure. Consider the inclusion of a data sheet to record vital information relevant to the sample and method for providing packaging and pre-labeling. (Appendix B, Item 37)

The inspectors reviewed procedure EPP-205A.7, "Obtaining the Iodine and Particulate Samples from the Main Stack and Roof Vents Following Accident Conditions", and concluded that it did not include checklists, data sheets and provisions for identifying samples. The licensee intends to complete this item by September 1983. See Item 4.1.

- 3.45 (Open) 277/81-28-44; 278/81-31-44 Include a procedure for post-accident sampling of displaced liquid and liquid effluent in the emergency plan implementing procedures. (Appendix B, item 38)

The inspectors held discussions with licensee operation and health physics personnel and concluded that a procedure for sampling post-accident radioactive liquids from retention tanks would be dependent on the installation of sampling means resulting from their evaluation, and will be resolved by May 1, 1983. However, see items 3.17 and 4.3.

- 3.46 (Closed) 277/81-28-45; 278/81-23-45 Amend the follow-up instructions in EP-205C for the Personnel Dosimetry, Bioassay and Respiratory Protection Group Leader to include reference to procedures to process respiratory equipment for reuse. (Appendix B, item 39)

The inspectors reviewed procedure EP 205C, "Personnel Dosimetry, Bioassay and Respiratory Protection Group," and noted that it includes references to other Health Physics procedures pertaining to the processing of respirators for reuse.

- 3.47 (Closed) 277/81-28-46; 278/81-31-46 Decrease the time required to identify onsite and missing individuals from 60 minutes to 30 minutes. (Appendix B, item 40)

The inspectors noted that during the annual exercise on June 16, 1982, the licensee was able to identify missing individuals within 30 minutes.

- 3.48 (Open) 277/81-28-47; 278/81-31-47 Revise the appropriate procedures to include: methods of monitoring and decontaminating large groups of personnel during accident situations; special considerations for skin contaminated with radioiodine; data sheets and body sketches to track decontamination events; and ensuring that collected data are provided to the emergency organizational element responsible for radiation protection during emergencies. (Appendix B, item 41)

The inspectors reviewed procedures for monitoring and decontamination of personnel and noted that decontamination limits were inadequately established, and that there were no sketches to follow the progress of the decontamination attempts. The licensee intends to resolve this item by May 1, 1983.

- 3.49 (Closed) 277/81-28-48; 278/81-31-48 Implement emergency procedure 207A. (Appendix B, item 42)

The inspectors noted that a new procedure EPP 207A, "Search and Rescue", was implemented on April 14, 1982.

- 3.50 (Closed) 277/81-28-49; 278/81-31-49 Submit procedure PP-10 to PORC for review and train the security force on its contents. (Appendix B, item 43)

The inspectors noted that procedure PP-10, "Emergency Conditions Implemented," was reviewed and approved by PORC on February 3, 1982. In addition, security personnel were trained on the use of the procedure.

- 3.51 (Open) 277/81-28-50; 278/81-31-50 Incorporate into EP-206B specific locations and description of equipment (e.g., radiation detection instruments, tools, etc.); the criteria and logistics of selection of repair team members; communication means and precautions to be employed. (Appendix B, item 44)

The inspectors noted that procedure EPP 206B, May 23, 1982, "Emergency Repair Group", did not address the intent of this finding. The licensee intends to correct this deficiency by May 1, 1983.

- 3.52 (Closed) 277/81-28-51; 278/81-31-51 Complete the recovery organization chart and amend the Emergency Plan to include the revised chart. (Appendix B, item 45)

The inspectors noted that the Emergency Plan was updated, and the recovery organization chart was completed.

- 3.53 (Closed) 277/81-28-52; 278/81-28-52 Revise the emergency equipment inventory and calibration procedure to define the specific checks required to ensure instrument operability, and steps to take when discrepancies are encountered. (Appendix B, item 46)

The inspectors reviewed emergency equipment inventory lists and procedures and noted that specific checks required to ensure instrument operability are included.

- 3.54 (Closed) 277/81-28-53; 278/81-28-53 Provide a Radiological Monitoring ST/EP to include an annual drill in addition to the annual exercise. The ST/EP shall be compatible with NUREG-0654. (Appendix B, item 47)

The inspectors noted that Procedure ST/EP-6 includes the requirement for an annual drill in addition to the annual exercise.

- 3.55 (Closed) 277/81-28-54; 278/81-31-54 Provide a Health Physics ST/EP to include semi-annual and annual drills in addition to the annual exercise. The ST/EP shall be compatible with NUREG-0654, Section N.2.c.1. (Appendix B, item 48)

The inspectors noted that ST/EP-7 includes the requirement for semi-annual and annual drills in addition to the annual exercise.

- 3.56 (Closed) 277/81-28-55; 278/81-31-55 Review existing ST/EPs and bring all references to EPs up-to-date. (Appendix B, item 49)

The inspectors noted that existing ST/EPs were reviewed, and references to EPs were brought up to date.

- 3.57 (Closed) 277/81-28-56; 278/81-31-56 Standardize ST/EP format so that all procedures clearly indicate critique responsibilities and the responsibility for corrective actions. (Appendix B, item 50)

The inspectors noted that revised ST/EPs indicate a requirement for a critique and indicated corrective action responsibilities.

- 3.58 (Closed) 277/81-28-57; 278/81-31-57) Amend ST/EP-8 to include provision for backshift and unannounced exercises as required by NUREG-0654. (Appendix B, item 51)

The inspectors noted that ST/EP-8, "General Emergency Annual Exercise", includes provisions for backshift, and unannounced exercises.

- 3.59 (Closed) 277/81-28-59; 278/81-31-59 Distribute recent changes of the emergency plan to those on the distribution list. (Appendix B, item 52)

The inspectors noted that recent changes to the Emergency Plan had been distributed in accordance with Administrative Procedure A-2, "Control and use of Documents".

- 3.60 (Closed) 277/81-28-60; 278/81-31-60 Include all letters of agreement and memos of understanding within the emergency plan. (Appendix B, item 53)

The inspectors noted that all required letters of agreement and memos of understanding appear in Appendix B of the Emergency Plan.

- 3.61 (Closed) 277/81-28-61; 278/81-31-61 Complete and distribute to the general public, the brochure covering emergency information. (Appendix B, item 54)

The inspectors noted that the completion and distribution of emergency information brochures was completed prior to the June 16, 1982 annual exercise.

- 3.62 (Closed) 277/81-28-62; 278/81-31-62 Conduct a meeting with the news media to acquaint them with the emergency plan. (Appendix B, item 55)

The inspectors noted that a meeting with the news media was conducted on June 7, 1982.

- 3.63 (Closed) 277/81-28-63; 278/81-31-63 Perform a medical drill in accordance with required frequency. (Appendix B, item 56)

The inspectors noted that a medical drill was performed on June 16, 1982.

- 3.64 (Closed) 277/81-28-64; 278/81-31-64 Provide a time restraint for corrective actions identified by drills. (Appendix B, item 57)

The inspectors noted that provisions for a time limit for corrective actions identified by drills was included in ST/EPs.

- 3.65 (Open) 277/81-28-65; 278/81-31-65 Training on the new EAL table in EP-202 should include the purpose of EALs, and emphasize that no waiting is necessary for dose calculations (after a general emergency is declared) before notifying offsite authorities. This should also be emphasized to the offsite authorities during their training. (Appendix B, item 58)

The inspectors noted that emergency training would be conducted in the near future and that this item would be included. The licensee intends to conduct pertinent training by May 1, 1983.

4. Items Identified During This Inspection Which Should be Considered for Improvement

- 4.1 (Open) 277/83-01-01; 278/83-01-01 Review Emergency Plan Implementing procedures and make revisions to:

- (a) clarify required actions, and the duties and responsibilities of personnel performing these actions;
- (b) Correct wordy discussions, unnecessary references and other extraneous materials which do not help the users to perform the tasks at hand;
- (c) Provide specific cross-references to other procedures in the action steps needed to further detail and clarify actions;
- (d) Include lines of command, communication, and information flow as necessary to perform specific response actions; and
- (e) Ensure that emergency response tasks are coordinated between appropriate elements of the emergency organization and are consistent with the organizational structures.

The licensee has agreed to revise all Emergency Implementing Procedures by September 1983.

- 4.2 (Open) 277/83-01-02; 278/83-01-02 Revise Emergency Implementing Procedure EPP 205A.12 to specify criteria for using filter media (e.g., Silver Zeolite). The licensee intends to satisfy this item by May 1, 1983.

- 4.3 (Open) 277/83-01-03; 278/83-01-03 Ensure that post-accident sampling and analysis equipment meets the criteria of NUREG 0737. The licensee has submitted a description of the Post Accident sampling and analysis equipment to NRR on letter dated January 31, 1983, and is waiting for approval.

5. Exit Interview

On January 14, 1983, the inspectors met with those individuals identified in paragraph 1, and discussed inspection findings.