

April 4, 1983

James P. Gleason, Esq. Chairman
Administrative Judge
513 Gilmore Drive
Silver Spring, MD 20901

Dr. Oscar H. Paris
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, DC 20555

In the Matter of
Consolidated Edison Company of New York
(Indian Point, Unit 2)
Power Authority of the State of New York
(Indian Point, Unit 3)
Docket Nos. 50-247-SP & 50-286-SP

Dear Administrative Judges:

Pursuant to the Licensing Board's ruling of March 31, 1983, the Staff hereby submits a copy of NRC Inspection Report No. 50-247/83-09 dated March 29, 1983 ("Report") which provides the results of the Staff's emergency preparedness inspection and observation of the licensee's annual emergency exercise performed on March 9, 1983. This Report is provided for the information of the Licensing Board and parties.

The Staff requests that it be permitted an opportunity to testify concerning that Report on the evening of April 27, 1983.

Sincerely,

Donald F. Hassell
Counsel for NRC Staff

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J. Hannon
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DMB - PDR/LPDR

Enclosure: As stated

cc w/encl: Service List

DS07

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DATE	:4/04/83	:4/4/83	:	:	:	:	:



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

MAR 29 1983

Docket No. 50-247

Consolidated Edison Company of
New York, Inc.
ATTN: Mr. John D. O'Toole
Vice President - Nuclear
Engineering and Quality Assurance
4 Irving Place
New York, New York 10003

Gentlemen:

Subject: Inspection No. 50-247/83-09

This refers to the routine safety inspection conducted by Mr. Hilbert Crocker of this office and other members of an NRC team on March 8-10, 1983 at the Indian Point Station of activities authorized by NRC License No. DPR-26 and to the discussions of our findings held by Mr. Crocker with Mr. C. Jackson and others of your staff at the conclusion of the inspection.

Areas examined during this inspection are described in the NRC Region I Inspection Report which is enclosed with this letter. Within these areas, the inspection consisted of selective examinations of procedures and representative records, interviews with personnel, and observations by the team.

Within the scope of this inspection, no violations were observed.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215) 337-5223.

No reply to this letter is required. Your cooperation with us in this matter is appreciated.

Sincerely,

Thomas T. Martin, Director
Division of Engineering and Technical
Programs

Enclosure: NRC Region I Inspection Report Number 50-247/80-09

cc w/encl:

C. W. Jackson, Vice President, Nuclear Power
M. Blatt, Acting, Director, Regulatory Affairs
W. D. Hamlin, Assistant to Resident Manager
F. Matra, Resident Construction Manager
R. L. Spring, Nuclear Licensing Engineer
Thomas J. Farrelly, Esquire
K. Burke, General Manager, Administrative Services
Brent L. Brandenburg, Assistant General Counsel
Director, Power Division
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
State of New York

bcc: w/encl

Region I Docket Room (With concurrences)
Chief, Operational Support Section (w/o encls)
DPRP Section Chief

U. S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-247/83-09

Docket No. 50-247

License No. DPR-26 Priority _____ Category C

Licensee: Consolidated Edison Company of New York, Inc.

4 Irving Place

New York, New York 10003

Facility Name: Indian Point Unit No. 2

Inspection At: Buchanan, New York

Inspection Conducted: March 8-10, 1983

Inspectors: Hilbert W. Crocker 3/28/83
Hilbert W. Crocker, Chief, date
Emergency Preparedness Section, RPB
DETP, RI, NRC

- J. R. Sears, IE, NRC
- T. J. Kenny, RPS, DPRP, RI
- W. H. Baunack, RPS, DPRP, RI
- J. B. Martin, Battelle, PNL
- G. Martin, Battelle, PNL
- J. Mann, Battelle, PNL
- F. Vosbury, Battelle, PNL

Approved by: Ronald R. Bellamy 3/29/83
R. R. Bellamy, Chief, Radiological date
Protection Branch, DETP, RI, NRC

Inspection Summary: Inspection on March 8-10, 1983 (Report No. 50-247/83-09)

Areas Inspected: Routine announced emergency preparedness inspection and observation of the licensee's annual emergency exercise performed on March 9, 1983. The inspection involved 202 inspection-hours by a team of eight NRC and NRC contractor personnel.

Results: No violations were identified.

DETAILS

1. Persons Contacted

The following licensee representatives attended the exit meeting on March 10, 1983:

- J. Basile, General Manager, Nuclear Power Generation
- M. Blatt, Acting Director, Regulatory Affairs
- P. Borello, Manager, Operations Analysis
- K. Burke, General Manager, Administrative Services
- A. S. Cheifitz, General Manager, Corporate Emergency Response Planning
- T. J. Doyle, M.D., Chief Medical Officer
- R. D. Gauny, General Manager, Environmental Health & Safety
- A. Giorgio, Sr. Methods Analyst
- C. W. Jackson, Vice President, Nuclear Power Generation
- L. Kleinman, Public Information
- G. H. Leibler, Director, Emergency Planning
- B. Linderen, Public Information
- E. R. McGrath, Executive Vice President
- J. F. McHay, Supervisor, Nuclear Medical Services
- W. A. Monti, Nuclear Consultant, Nuclear Power Generator
- B. Noble, Public Information
- J. D. O'Toole, Vice President, Nuclear Engineering and Quality Assurance
- M. C. Smith, Acting General Manager, Technical Support
- R. Spring, Nuclear Licensing Engineer
- J. Tamburri, Indian Point Projects
- W. Thompson, Emergency Planning

2. Emergency Exercise

The Indian Point Station Unit No. 2 full scale exercise was conducted on March 9, 1983, from 5:00 a.m. until 5:00 p.m.

a. Pre-exercise Activities

Prior to the emergency exercise, NRC Region I representatives had telephone discussions with licensee representatives to review the scope and content of the exercise scenario. As a result, revisions were made by the licensee to plant data sheets, and messages, and portions of the exercise were clarified.

In addition, NRC observers attended a licensee briefing for licensee controllers and observers on March 8, 1983, and participated in the discussion of emergency response actions expected during the various phases of the scenario. The licensee stated that certain emergency response activities would be simulated and that controllers would intercede in activities to prevent disturbing normal plant operations.

The licensee scenario started with a reactor coolant leak into containment. A fire resulting in injury and contamination to workers followed, an interruption of offsite power then occurred. Subsequently a reactor coolant pump developed a locked rotor. Reactor coolant leakage increased and subsequent fuel cladding failure occurred. A large-break LOCA was experienced followed by hydrogen buildup in containment. Following added equipment problems a hydrogen burn occurred in containment which unseated a containment purge valve and allowed a release of activity to the environment. Eventually the release was terminated and operations continued in the long term cooling mode to cold shutdown. The scenario included conditions for the licensee to exercise the onsite facilities; the corporate support organization; notification/communications with offsite agencies regarding upgrading and downgrading of emergency classifications; and the offsite response of ambulance and medical support. The noble gas release permitted the state and counties to implement their planned exercise objectives for their facilities and response of offsite groups.

Based on the above findings, this portion of the licensee's exercise appeared to be acceptable.

b. Exercise Observation

During the conduct of the licensee's exercise, NRC team members made detailed observations of the activation and augmentation of the emergency organization; activation of emergency response facilities; and actions of emergency response personnel during the operation of the emergency response facilities. The following activities were observed:

- (1) Detection, classification, and assessment of the scenario events;
- (2) Direction and coordination of the emergency response;
- (3) Notification of licensee personnel and offsite agencies of pertinent information;
- (4) Communications/information flow, and record keeping;
- (5) Assessment and projection of radiological (dose) data and consideration of protective actions;
- (6) Provision for in-plant radiation protection;
- (7) Performance of offsite and in-plant radiological surveys;
- (8) Maintenance of site security and access control;
- (9) Performance of technical support;

- (10) Performance of repair and corrective actions;
- (11) Performance of first aid and rescue;
- (12) Fire fighting;
- (13) Assembly and accountability of personnel; and
- (14) Management of Accident recovery operations.

The NRC team noted that the licensee's activation and augmentation of the emergency organization; activation of the emergency response facilities; and actions and use of the facilities were generally consistent with their emergency response plan and implementing procedures. The team also noted the following areas where the licensee's activities were thoroughly planned and efficiently implemented:

- o Control Room (CR) participants consistently provided thorough assessments and solutions to problems which occurred during the exercise and the communications among the Control Room personnel were timely, clear and concise.
- o The onsite portion of the fire and contaminated and injured worker incident, including contamination control and decontamination.
- o The Operations Support Center (OSC) office activities in assignment of personnel to tasks, maintaining accountability and personnel exposure histories, and tracking of plant status.
- o Development of repair alternatives and coordination of plans between OSC coordinators.
- o The Mobile Unit #2 Offsite Monitoring Team's activities in locating sample points, equipment checkout and operation and communications with the Emergency Operations Facility (EOF).
- o The Dose Assessment Team (Dose Assessment Health Physicist and Midas Operator) performance of their assignments.
- o The Offsite Radiological Assessment Director's management of the dose assessment activities prior to the airborne releases:

i.e. reviewed meteorological data; directed deployment of offsite monitoring teams; considered potential impacts upon the EOF and News Center; and provided periodic briefings to management.

- o Habitability measurements for the Technical Support Center (TSC), CR, OSC and EOF.
- o The Emergency Director of the EOF was effective in facility control, task delegation, utilization of staff input, and making decisions.
- o Utilization of the R-10, R-25, and R-26 containment monitor readings in the EOF technical evaluations.
- o News Center bulletin's provision of timely event status to the counties throughout the exercise.

The NRC team findings in areas for licensee improvement were as follows:

- o The inplant response teams were not equipped with radios or other means for communication with the OSC.
- o Plant page system announcements were not audible in some plant areas at the time of the Site Area Emergency and General Emergency declarations.
- o Announcements of plant status during the exercise were generally limited to the CR, OSC, TSC and EOF locations and personnel at other locations were not always informed.
- o The technical discussions between control room personnel and the reactor manufacturer relating to thermocouple performance during low core flow were not communicated between the CR-TSC-EOF in a timely manner.
- o All personnel in the TSC and OSC were not provided with dosimetry at times when releases were in progress.
- o EOF instructions for one mobile offsite monitoring team to locate another such team on two occasions resulted in unnecessary traverse of the plume in each case.
- o Two of the five mobile offsite monitoring teams were instructed to sit idle for extended periods of time (one for about five hours) while they could have been effectively used in other offsite sectors.
- o Offsite monitoring teams did not effectively traverse the plume areas to provide good plume definition, and only six sets of

positive readings (above background) were reported to the EOF during the release.

- o The EOF was forced to rely on meteorological and isopleths for plume definition.
- o Delays of 45 to 70 minutes were experienced between EOF discussions for protective action recommendations and formal transmission of the recommendations to the State of New York. In one case the formal transmission for the population between five and ten miles waited until the plume had extended beyond five miles. However, in all cases the State of New York was involved throughout the discussions and decisions and the delay of formal recommendations did not reduce the effectiveness of off-site actions.
- o The EOF message forms to communicate information to offsite agencies do not contain sufficient allocation of space to effectively describe the recommended protective actions.
- o The noise level at the EOF was at times distracting and interfered with telephone message transmissions.
- o Information feedback from some offsite agencies was limited and it was uncertain at the EOF when and whether the EBS messages were broadcast.
- o The state representative in the EOF should be repositioned closer to the licensee and NRC decision makers to improve effectiveness of emergency discussions.
- o The plant status log at the EOF was, on occasion, thirty minutes behind actual plant conditions.
- o The EOF has limited space and approximately one-third of the NRC assigned area serves as an entrance aisle to the main area of the EOF.

c. Exercise Critique

The NRC team attended the licensee's post-exercise critique on March 10, 1983, during which key licensee controllers discussed their observations of the exercise. The licensee participants highlighted areas for improvement which the licensee indicated would be evaluated and appropriate action taken.

3. Exit Meeting and NRC Critique

Following the licensee's self-critique, the NRC team met with the licensee representatives listed in Section 1. The team leader summarized

the observations made during the exercise and discussed the areas described in Section 2.b.

The licensee was informed that no violations were observed and although there were areas identified for improvement, the NRC team determined that within the scope and limitations of the scenario, the licensee's performance demonstrated that they could implement their Emergency Plan and Emergency Plan Implementing Procedures in a manner which would adequately provide protective measures for the health and safety of the public.

Licensee management acknowledged the findings and indicated that appropriate action would be taken regarding the identified improvement areas.