

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-346/82-26(DEPOS)

Docket No. 50-346

License No. NPF-3

Licensee: Toledo Edison Company  
Edison Plaza  
300 Madison Avenue  
Toledo, OH 43652

Facility Name: Davis-Besse Nuclear Power Station

Safety Evaluation Report Conducted: September 1982

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*10/6/82*

Safety Evaluation Report Summary

Safety Evaluation Report on September 1982 (Report No. 50-346/82-26(DEPOS))  
Routine Safety Evaluation Report of Site Emergency Plan of June 1982. The inspection involved 65 inspector-hours by one NRC inspector.  
Results: The plan meets the planning standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E.

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EMERGENCY PREPAREDNESS

Safety Evaluation Report  
related to the operation of  
Davis-Besse Nuclear Power Station

Docket No. 50-346  
NRC Operating License No. NPF-3  
Toledo Edison Company

U.S. Nuclear Regulatory Commission

The Toledo Edison Company has submitted Emergency Plans for the Davis-Besse Nuclear Power Station dated March and May 1980, January and August 1981, and June 1982. During the period February 8-19, 1982, NRC Staff conducted an appraisal of the Emergency Preparedness Program at the Station. In conjunction with this appraisal, the Emergency Plan for the Station was reviewed, and certain deficiencies in the Plan were identified and documented in Appendix C to Appraisal Report No. 50-346/82-01, dated March 23, 1982. The licensee responded to these comments by letter dated April 20, 1982 from Mr. R. P. Crouse to Mr. J. G. Keppler and by issuing a revision to the Emergency Plan dated June 1982. We have completed our review of the June 1982 Emergency Plan; Emergency Plan Implementing Procedure EI 1300.08; and correspondence related to the Prompt Notification System dated December 15 and 30, 1981 and January 15 and 29, 1982, from Mr. R. P. Crouse to Mr. J. G. Keppler. Also reviewed regarding the Prompt Notification System were Inspection Reports No. 50-346/82-06 and No. 50-346/82-19, dated March 11 and July 28, 1982, respectively. This Emergency Preparedness Safety Evaluation Report with the NRC Staff conclusions has been prepared incorporating the findings of the NRC Staff review.

## EVALUATION OF LICENSEE EMERGENCY PLAN

### A. Assignment of Responsibility (Organization Control)

#### Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

#### Emergency Plan

When an emergency condition is declared at the Davis-Besse Nuclear Power Station (DBNPS), members of the Normal Plant Organization assume duties in the Onsite Emergency Organization. The assignment of responsibilities in the Onsite Emergency Organization is ultimately the responsibility of the Station Superintendent. However, the Emergency Planning Supervisor is responsible for establishing and maintaining an onsite emergency organization which has predefined primary and alternate assignments to various positions.

In an emergency situation, the Shift Supervisor on duty becomes the interim Emergency Duty Officer (EDO) until relieved by the designated EDO. Although the Shift Supervisor's (interim EDO) duties and responsibilities are generally exercised in the initial phase of an emergency, he has the ability and authority to direct all phases of the emergency operations. The EDO for each week is designated by the Station Superintendent. The EDO remains on call at all times and is capable of responding to any emergency at DBNPS within 60 minutes of notification.

The EDO is in command of the Onsite Emergency Organization, which is divided into an Emergency Operations Group and a Station Operations Group. The Emergency Operations Group, managed by the Nuclear Services Director or his alternate, provides direction and technical guidance to the EDO. The Station Operations Group is managed by the Station Superintendent, who is responsible to the EDO for directing plant operations and damage control efforts.

In the event of a Site Area or General Emergency, the Onsite Emergency Organization reports to the Operations Director, who is a member of the Offsite Emergency Organization. The Offsite Emergency Organization is managed by the Emergency Director at Toledo Edison Company (TECo) corporate headquarters. The Emergency Director has overall corporate responsibility for TECo's response to the emergency. However, the Operation's Director (OD) has authority to recommend protection actions for the public. The OD is located at the licensee's Emergency Control Center (EOF: NUREG-0696).



Additional onsite and offsite emergency staff functions and personnel assignments are described in the Emergency Plan and its implementing procedures.

Updated, written agreements have been executed with appropriate governmental agencies and other organizations. Participating governmental agencies whose emergency plans are inter-related with the DBNPS Emergency Plan include:

U.S. Nuclear Regulatory Commission, Region III; U.S. Department of Energy; Federal Emergency Management Agency, Region V; State of Ohio; State of Michigan; and Ottawa County, Ohio. The ten mile Emergency Planning Zone (EPZ) includes Ottawa County and Jerusalem Township in neighboring Lucas County. The Ottawa County Radiological Emergency Plan has been factored into the development of the DBNPS Emergency Plan and the Lucas County plan has been factored into the Ottawa County plan. Written agreements with non-governmental organizations having emergency response responsibilities are provided as Appendix C to the Plan. Functional inter-relationships of the response organizations having radiological emergency planning responsibilities are summarized in Figure 1.

FIGURE 1

FIGURE 1

FUNCTIONAL INTER-RELATIONSHIPS OF RESPONSE ORGANIZATIONS

LEGEND: R = Task Responsibility  
A = Task Assistance

RESPONSE FUNCTION	DAVIS-BESSE NUCLEAR POWER STATION					RESPONSE ORGANIZATION(S)
	OTHER SUPPORT	LOCAL SUPPORT	STATE SUPPORT	FEDERAL SUPPORT	ENGINEERING SUPPORT	
Plant Operation Control					R	Control Room/Technical Support Center
Engineering Assessment					R A	Technical Support Center
Meteorological Data				A	R	Emergency Control Center
Protective Response		A	R	A	A	Emergency Control Center
Command & Control of Emer. Response		R	A			Emergency Control Center
Warning		R	A			Control Room
Notification & Communication	A	R	A			Control Room/Emergency Control Center
Public Information		R	A	A		Emergency Control Center
Accident Assessment				A	R A	Technical Support Center
Public Health & Sanitation		A	R	A		Emergency Control Center
Social Services		R	A	A		Emergency Control Center
Fire & Rescue		R				Control Room
Emergency Medical Service	A	R				Control Room
Traffic Control		R	A			Nuclear Security
Law Enforcement		R	A	A		Nuclear Security
Transportation			R			Emergency Control Center
Radiological Exposure Control		A	R	A		Emergency Control Center

LOCAL

Ottawa Cty. D.S.A.  
Ottawa Cty. Sheriff  
Carroll Twp. EMS & Fire  
H. B. Magruder Hospital

STATE

State of Ohio D.S.A.  
Ohio Dept. of Transportation  
State of Ohio E.P.A.  
Ohio State Highway Patrol  
Ohio National Guard

FEDERAL

NRC Region III  
U. S. D. O. E.  
U. S. E. P. A.  
FEMA  
F.B.I.  
U.S. Coast Guard  
National Weather Serv.

ENGINEERING SUPPORT

Babcock & Wilcox  
Bechtel  
  
OTHER SUPPORT  
REMS Corporation  
INPO  
American Nuclear Ins.

MUTUAL AID SUPPORT

Detroit Edison Co.  
Consumers Power Co.  
Cincinnati Gas & Electric Co.  
Cleveland Electric Illuminating Co.

B. Onsite Emergency Organization (Closed, 346/82-01-06)

Planning Standard

On-shift facility licensee responsibilities for emergency response are specifically defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

Emergency Plan

The Station Superintendent directs and supervises all operating, administrative, technical, and maintenance activities during normal operations at the DBNPS. In an emergency, members of the Normal Plant Organization assume duties in the Onsite Emergency Organization, as summarized in Figure 2. The Shift Supervisor functions as interim EDO (Emergency Duty Officer) until relieved by the designated EDO. Initial Shift Supervisor duties in an emergency include: verifying the existence of an emergency condition; notifying the Station Superintendent, EDO, station personnel, and offsite support groups as required; activating Emergency Teams; assuring controlled access to the Control Room; initiating immediate protective measures as required; and verifying the operating status of the plant. Upon being informed that an emergency exists, the EDO's main functional responsibilities include:

- a. Reporting to the Emergency Control Center and relieving the Shift Supervisor of his interim EDO duties;
- b. Evaluating the information, data, and methods used by the Shift Supervisor in determining that an emergency condition exists to ensure that the proper evaluation and classification have been made;
- c. Determining to what extent offsite and onsite emergency response organizations will be alerted or activated, per established guidelines;
- d. Ensuring that these organizations are notified or activated as required;
- e. Ensuring that Emergency Nuclear Incident Essential Information is completed and supplied to State and County Disaster Services Agencies;
- f. Ensuring that dose rate calculations are periodically performed per the plan's implementing procedures; and
- g. Providing TECo recommendations to authorities regarding protective and corrective actions. This responsibility may not be delegated.

FIGURE 2

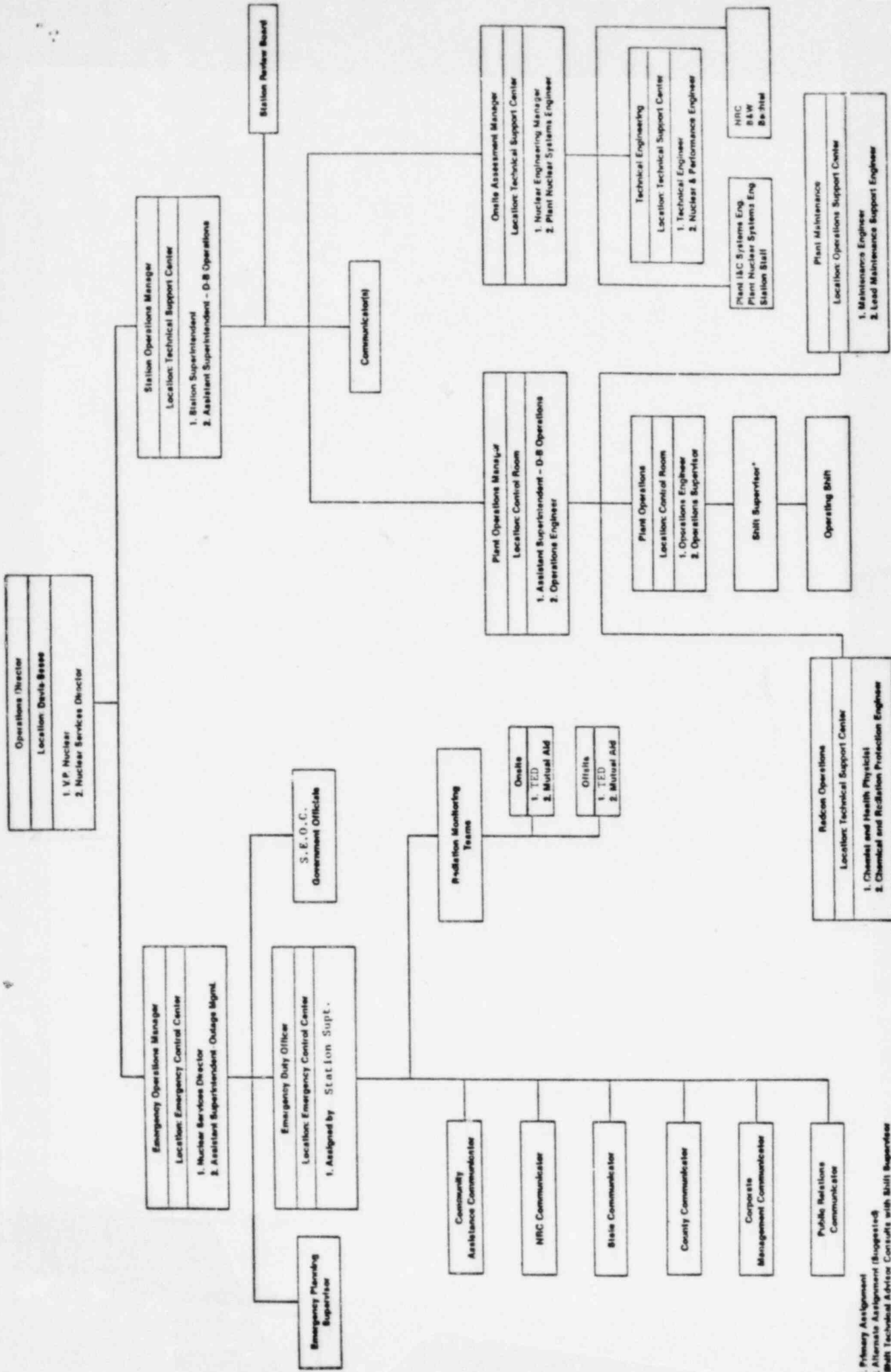


FIGURE 2

1. Primary Assignment  
 2. Alternate Assignment (Support)  
 \*Shift Technical Advisor Contacts with Shift Supervisor  
 Individuals will report to their primary assignments.  
 A designated TED representative will notify alternate of any vacancies they may be required to fill.

The EDO commands the Onsite Emergency Organization, which is composed of an Emergency Operations Group and a Station Operations Group. Responsibilities and emergency assignments for key personnel in these groups are described in the Plan. In a Site or General Emergency, the Onsite Emergency Organization reports to the Operations Director, who is a member of the Offsite Emergency Organization located at the Davis-Besse Administration Building (DBAB), which is comprised of a TSC and EOF pursuant to NUREG-0696.

The minimum on-shift staffing levels discussed in the Plan meet the objectives of Table B-1 of NUREG-0654 Revision 1. The following minimum on-shift expertise is maintained 24 hours per day: one Shift Supervisor (SRO), one Assistant Shift Supervisor (SRO), two Control Room Operators, two Auxiliary Operators, one Shift Technical Advisor, one Administrative Assistant, one Health Physics Technician, and one Radiation Chemistry Technician. Within 30 to 45 minutes additional personnel will be available for communications, in-plant protective actions, radiological accident assessment, operational support, plant system engineering, and corrective actions. Within 60 minutes a total of fourteen persons will be available to augment the normal shift staff to provide the Operations Director adequate support in the aforementioned functional areas.

The Plan lists twelve key personnel, by title, who are provided with a secure paging system activated by order from the Shift Supervisor. These personnel are notified immediately upon the declaration of any event requiring implementation of the Emergency Plan, as per Procedure AD 1827.17. Key emergency personnel equipped with pagers are within a 60 minute response time of the site, and report to predesignated emergency response facilities.

C. Emergency Response Support and Resources (Closed 346/82-01-07)

Planning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

Emergency Plan

Arrangements for requesting and utilizing outside resources have been made, including authority to request implementation of the Department of Energy Radiological Assistance Plan (DOE-RAP) and the Interagency Radiological Assistance Plan. Toledo Edison Company (TECo) would request DOE-RAP assistance only when the Emergency Planning Supervisor and the EDO conclude such assistance will be needed. The Emergency Planning Supervisor is responsible for contacting the DOE. Expected arrival times for DOE teams and equipment are given in the Plan. The licensee retains the REMS Corporation to provide expert medical consultation, a radiation emergency medical team, training for local



medical staffs, and access to special facilities for the evaluation and treatment of radiation injuries. Additional manpower to perform off-site radiation protection activities is available through a mutual assistance agreement between TECo and four other corporations owning nuclear generating stations. The scope of assistance to be provided by these utilities is described in the Mutual Assistance Agreement appended to the Plan.

The Emergency Operations Group manager is responsible for coordinating short-term community assistance activities and response to the needs of local government officials. The Emergency Planning Supervisor is responsible for ensuring that a TECo representative is dispatched to the Ottawa County Emergency Operations Center (EOC) in Port Clinton, Ohio, to coordinate with local government and the Manager of Emergency Operations. During an emergency, representatives from the State of Ohio government agencies assemble at the State Emergency Operations Center (EOC) to manage the response efforts. A TECo representative is also sent to the State EOC in Worthington, Ohio, or to its alternate location in Columbus, Ohio.

The Davis-Besse Administration Building (DBAB) is a licensee controlled facility constructed to house the Emergency Response Facilities (ERFs) necessary to assist Control Room personnel in the mitigation of accident consequences. The restricted area of this structure includes an Emergency Control Center (ECC), the focal point for protective action planning and continuous coordination and control of onsite and offsite emergency activities. The ECC contains systems to maintain communications with Federal, State, and local officials as well as radiation monitoring teams. The Site Emergency Operations Center (SEOC) is located in a non-restricted area of the DBAB. The primary function of the SEOC is to provide protected accommodations for state and local officials providing communications and coordination with offsite emergency response agencies. The Offsite Emergency Center consists of designated areas of the TECo's Edison Plaza Building in Toledo, Ohio. It can accommodate both technical and non-technical members of offsite emergency organizations during an emergency.

D. Emergency Classification System (Closed 346/82-01-08)

Planning Standard

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Emergency Plan

Four standard emergency classes (Unusual Event, Alert, Site Emergency, and General Emergency) have been established. Emergency Action Levels (EALs), used for rapid classification of emergency situations, are indicated in the Plan. Per the guidance of Appendix 1 of NUREG-0654 Revision 1, EALs have been based on onsite and offsite radiation



monitoring data and readings from various reactor-related systems sensors. EALs have also been developed for security threats, natural phenomena (such as earthquakes, floods, and tornadoes), and other hazards (including fires, explosions, toxic gas releases, projected doses at or beyond the site boundary, and onsite transportation accidents involving aircraft or land vehicles). The licensee has indicated that EALs based on readings from the Kamen High Range Station Vent System will be added to the Plan after this system has been installed. EALs for postulated accidents in the FSAR have been included in the plan.

E. Notification Methods and Procedures (Closed 346/82-01-09)

Planning Standard

Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and followup messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

Emergency Plan

The licensee has established procedures for the notification of State and local response organizations in case of an emergency. As interim EDO, the Shift Supervisor is responsible for declaring an emergency based upon available information and professional judgment. The Shift Supervisor ensures that immediate notification requirements are met and functions as the EDO until relieved by the designated EDO.

After ensuring that the proper emergency classification has been made by the Shift Supervisor, the EDO determines what offsite and onsite emergency organizations shall be notified, based on guidelines outlined in the Plan, if such actions have not already been performed by the Shift Supervisor. The notification sequence is summarized in Figure 3 and is described in the Plan. The licensee has established the contents of initial and followup messages from the plant to offsite authorities. The interim or designated EDO ensures that the Emergency Nuclear Incident Essential Information form, provided in Implementing Procedure EI 1300.08, is completed and data is transmitted to State and County Disaster Services Agencies. The form provides for dissemination of the following information: classification of the incident; time release started or is expected to start; estimated noble gas and radioiodine release rates; meteorological conditions; measured radiation levels; potential and/or actually affected areas; projected whole body and thyroid doses; and recommended protective actions. The form does not, however, provide for transmittal of information on projected or actual integrated dose rates at the site boundary and specific distances further downwind; ongoing licensee emergency response actions; request for onsite support from offsite agencies; and prognosis for worsening or termination of the event based on available information. Procedure EI 1300.08 and its message form will be evaluated in a subsequent inspection and its contents should be placed in the next revision to the Emergency Plan.

FIGURE 3

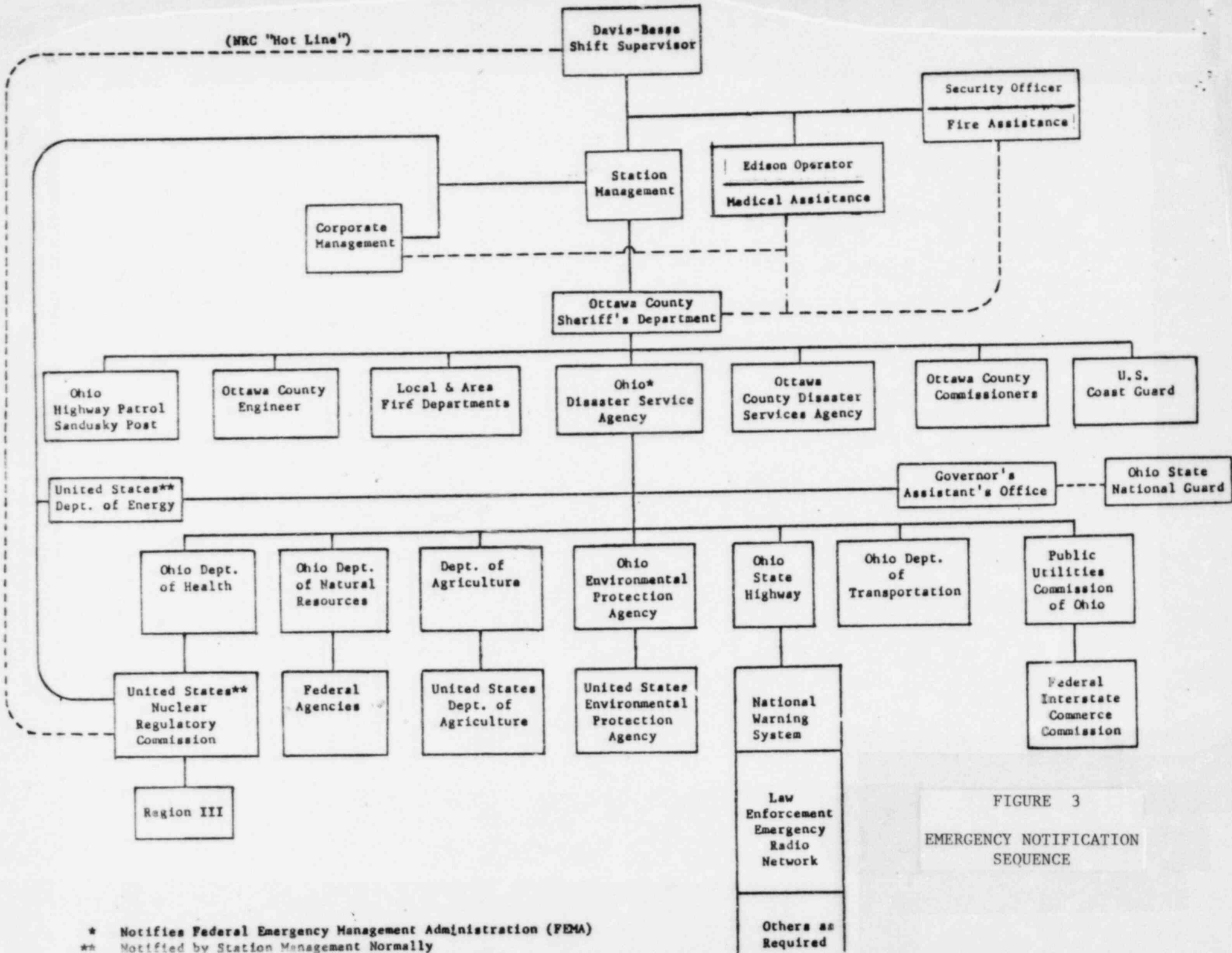


FIGURE 3  
EMERGENCY NOTIFICATION  
SEQUENCE

\* Notifies Federal Emergency Management Administration (FEMA)  
 \*\* Notified by Station Management Normally

The responsibility for notifications to protect persons in offsite areas rests with the State of Ohio. Early warning and instructions to the population are accomplished under the direction of the Ohio Disaster Services Agency in conjunction with local officials and the Ottawa County Disaster Services Agency. TECo, through the EDO, provides protective action recommendations to state authorities. The plan states that sample content of messages to the public are provided in the State and Ottawa County Radiological Emergency Plans.

TECo has installed a Prompt Notification System (PNS), consisting of forty-two sirens and twenty-two tone alert radios within the ten mile EPZ. The Ottawa County Sheriff has the authority to activate the PNS. Siren and tone alert radio locations are documented separately from the DBNPS Emergency Plan. Tone alert radio locations include: schools, fire and police departments, a hospital, a nursing home, a state park, a wildlife refuge, the Ottawa County Disaster Services Office, and a local radio station. Warning device types and locations were chosen based on guidance contained in Appendix 3 to NUREG-0654 Revision 1.

In addition to the PNS, State and local officials have the capability to broadcast information and instructions to the general public over the Emergency Broadcast System and the NOAA National Weather Service alert system. Pagers, with telephone backup, have also been purchased to permit immediate contact between the licensee and certain local officials. Emergency vehicles with loud speakers and house to house notification by local fire and police department personnel are further means available to State and local government officials to inform the public to tune into radio and television stations for appropriate instructions.

#### F. Emergency Communications

##### Planning Standard

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

##### Emergency Plan

The Plan has established an extensive communications network with backup capabilities to assure reliable onsite and offsite communications between the various licensee Emergency Response Facilities (ERFs) and offsite agencies. The normal communications system includes the following General Telephone and Ohio Bell Systems: intraplant connections; a dedicated 3-way circuit to the Ottawa County and State Emergency Operations Centers; uninterruptible power source telephone lines for the NRC Emergency Notification System, NRC Health Physics Network, and TECo corporate headquarters; microwave connections for selected telephone lines; and normal telephone lines for offsite communications. A public address system, totally separate from the telephone system, provides multiple channels between various plant functional areas.

A UHF radio system, with the capability to transmit and receive voice communications in six frequencies, is described in the Plan. TECo has also established four separate communications loops between various onsite ERFs and offsite emergency facilities. These loops are designated the Technical Data, Technical Management, Policy Management, and Public Relations Loops. Emergency facilities serviced by each loop are listed in the Plan.

Three distinct station alarms at the DBNPS are the Fire, Containment Evacuation, and Initiate Emergency Procedures alarms. These alarms are activated from the Control Room and sound in all plant areas.

TECo maintains an Emergency Plan Telephone Directory which is kept current by the Emergency Planning Supervisor. Telephone numbers of managerial personnel, including those in the Offsite Emergency Organization, are maintained on a separate list that is updated quarterly. This list includes personnel of the REMS Corporation, hospitals, State and Federal agencies, and others with special responsibilities for emergency support. In addition, the Regional Emergency Medical System of Northwest Ohio ensures communication capability between Magruder Memorial Hospital and any other medical support facility.

#### G. Public Education and Information

##### Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

##### Emergency Plan

The plan provides for the dissemination of information to the public regarding how they will be notified and what their actions should be during an emergency. For members of the public residing within the ten mile EPZ, TECo provides written information on the following: basic radiation health; TECo Emergency Planning Program; actions that would be taken to protect the public; and the methods that would be used to warn the public of a real or potential emergency condition at DBNPS and the actions expected of the public. Methods of disseminating this information include direct mail of literature, information brochures contained in billing statements, and telephone book inserts. At least annually, TECo will update such information where required.



The Emergency Control Center (ECC) contains systems to establish and maintain communications with State, Federal, and local officials. The Site Emergency Operations Center (SEOC), also located in the Davis-Besse Administration Building (DBAB), provides protected accommodations for State and local officials for communication and coordination with offsite emergency response agencies.

The Offsite Emergency Center in the TECo corporate headquarters building (Edison Plaza) can house technical and non-technical segments of the Offsite Emergency Organization during an emergency. A Public Relations Center, for timely dissemination of information on plant conditions and emergency operations, can be located at Edison Plaza, the Jefferson Jr. High School in Port Clinton, the Construction Office Building, or at another site designated by the TECo Vice President - Public Relations. In addition, DBNPS representatives will be sent to the State and Ottawa County Emergency Operations Centers (EOCs).

Local media personnel (TV, radio, newspaper) are invited, on at least an annual basis, to participate in a training program on effective planning for licensee and offsite emergency organizations. The program includes a review of the Emergency Plan and Implementing Procedures with emphasis on classification of emergencies; reporting requirements; corrective and protective actions; assessments; and communications networks.

#### H. Emergency Facilities and Equipment (Closed 346/82-01-10)

##### Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

##### Emergency Plan

The Plan describes emergency facilities needed to support an emergency response. Licensee controlled Emergency Centers consist of the Control Room (CR) and the Davis-Besse Administration Building (DBAB). The DBAB was constructed to house Emergency Response Facilities (ERFs) necessary to assist CR personnel in the mitigation of accident consequences and abnormal operating conditions. As indicated in Figure 4, the DBAB is a structure approximately 2100 feet from the CR. The emergency response portion of the DBAB, located on the first floor, is divided into restricted and non-restricted areas. The first floor layout is provided as Figure 5. The restricted area includes the Emergency Control Center (ECC), Technical Support Center (TSC), Radiological Testing Laboratory (RTL), two mechanical equipment rooms, a computer equipment room, telephone equipment room, and badging, kitchen, and berthing areas. The non-restricted area consists of a Site Emergency Operations Center (SEOC) and a news briefing area. The Station Superintendent is responsible for planning and scheduling the quarterly inspection and inventory of emergency supplies and equipment available at or near each emergency center. Emergency equipment and supplies and their storage locations are listed in the Emergency Plan Implementing Procedures (EPIPs).

FIGURE 4

FIGURE 4  
 DAVIS-BESSE NUCLEAR POWER STATION SITE  
 ARRANGEMENT

LEGEND

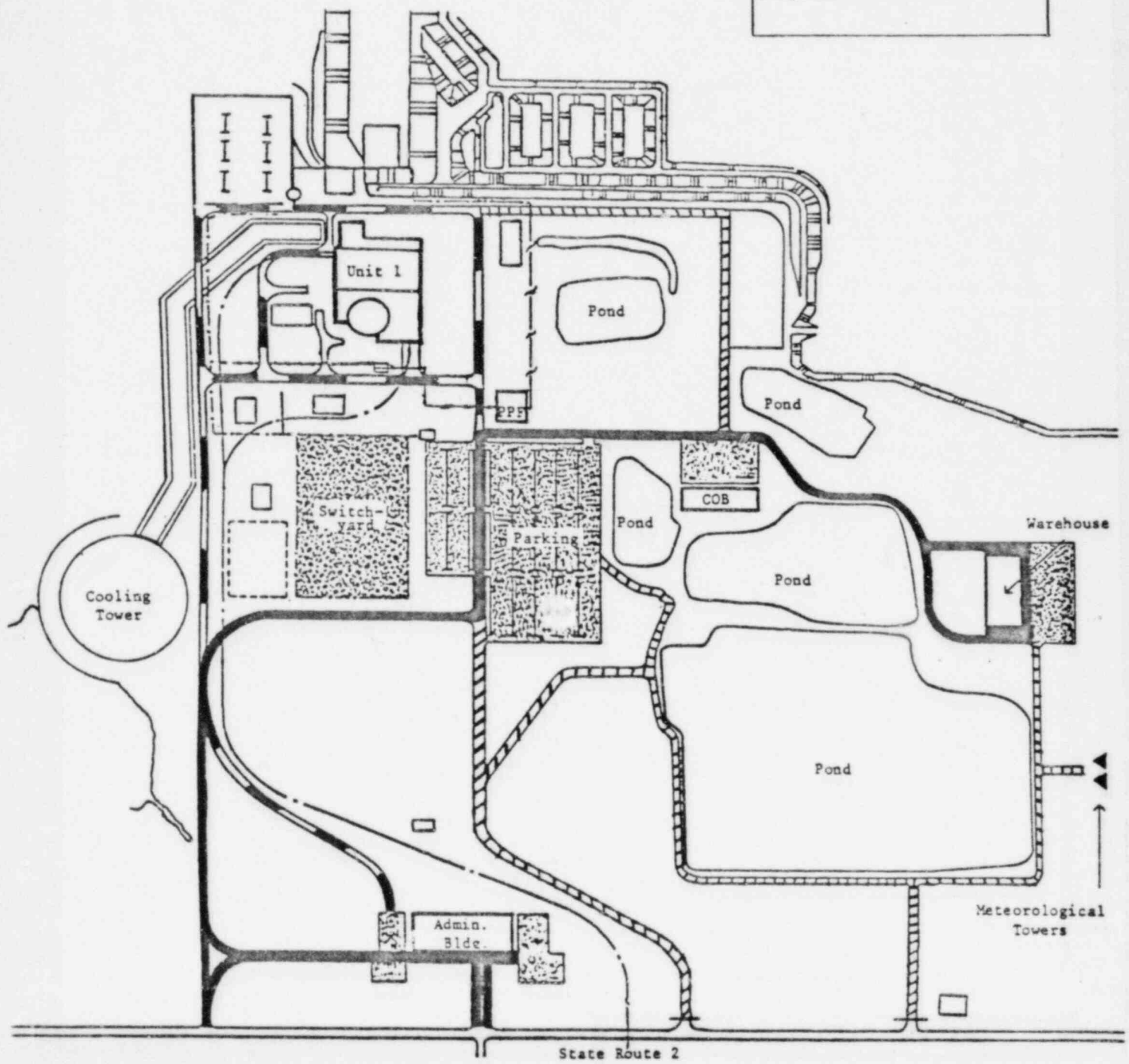
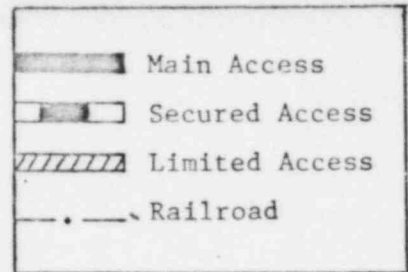




FIGURE 5



DBAB system operations are computer monitored and/or activated by the Central Control and Monitoring System (CCMS). This system maintains building temperature and ventilation, provides security alarms, trouble alarms, and fire protection as conditions warrant. For fires, an alarm on the CCMS automatically activates the dry sprinkler system in the Records Management vault, a Halogenated agent protection system in the ECC, TSC, TSC records storage room, and computer room, or a wet sprinkler system in any other area. For radiation protection, CCMS provides centralized radiation protection for the restricted area of the DBAB. Two emergency ventilation air handling units are provided to perform this function, one for the restricted area and one for the remaining areas. Either unit can supply the restricted area, should the primary unit fail. Upon activation at the CCMS/CRT, all outside air dampers close and the units switch to a recirculate mode through high efficiency filters. This provides habitability for approximately 30 days. A potable water system is provided to obtain potable water from the station and store up to 4,000 gallons within the DBAB.

The DBAB receives electrical power from a separate Power Structure located approximately 200 feet east of the DBAB. This structure is fed normally from the TECo system grid. Critical loads in the DBAB are connected to power supplies which can be automatically energized by an emergency diesel generator in the Power Structure while other critical loads receive power from a batterybacked uninterruptable power supply located in the Power Structure.

The ECC's primary function is to provide a centralized management focal point for protective action planning and continuous coordination and control of onsite and offsite emergency activities. Protective action recommendations are based on data obtained through the Data Acquisition and Display System (DADS). The ECC contains advanced communication systems to establish and maintain communication with State, Federal, and local officials and enables coordination and control of mobile Radiation Monitoring Teams (RMTs). The ECC provides space for occupancy of at least 16 people and for accommodating 4 RMT's.

The primary function of the TSC is to house and support an organization that provides management and technical assistance to the station operations personnel during emergency conditions and to prevent or mitigate the consequences of abnormal plant conditions. The TSC provides direct voice and data communication with the Control Room and serves as a primary communications contact with the offsite emergency organization of TECo. Visual observation of the Control Room will be available through closed-circuit television. The TSC also contains the DADS. The TSC contains work space for up to 25 people, including a main work area for 15 people and 3 conference areas.

The RTL's primary function is to provide a facility located near the ECC and TSC for radiological counting and analysis of low level environmental samples. The RTL contains work areas for four people and additional space allotted for temporary occupancy by field personnel. Major equipment

components in the RTL are designed to be easily removable for potential utilization in the field. The RTL is provided with a separate drain system to monitor for radioactivity and to dispose of wastes in accordance with approved procedures.

Both mens' and womens' berthing areas are provided for personnel required to support operations during an emergency. A dining area is also provided. Two apartments are also provided for TECo management personnel and the Nuclear Regulatory Commission.

The computer equipment room contains the prime computer for the DADS. The telephone equipment room contains the computer for communications networks and other communications terminals. The mechanical equipment room contains redundant systems for potable water acquisition, electrical distribution, heating and ventilation systems, and compressed air.

The DADS computer is designed to provide sufficient station information and data communication for operations personnel to evaluate and diagnose station conditions and activities so as to conduct emergency operations in an orderly manner. DADS provides data communication between the ECC, TSC, Control Room, and Emergency Support Center (ESC). The DADS is capable of functioning during and following most events expected to occur during the life of the Station.

The Energy Education Center (EEC) is the primary emergency news center for the DBNPS. It is located on the non-restricted area of the DBAB first floor. This area provides a radiologically and structurally protected location for press gatherings and briefing for approximately 200 individuals. Applicable equipment and offices are available to supply timely communications and information dissemination on plant conditions and concurrent emergency operations.

The SEOC is located within the non-restricted area of the DBAB first floor. It is near the central guard station to provide timely access to the ECC. The primary function of the SEOC is to provide protected accommodations for State and local officials providing communications and coordination with offsite emergency response agencies.

The Operations Support Center is an onsite area for plant personnel not on shift or not immediately required for plant control to muster for subsequent assignment to duties in support of emergency operations. It is located at the Assembly Area on the 523' elevation of the Turbine Building. Station Chemistry and Health Physics personnel would meet in the Health Physics Monitoring Room.

The Offsite Emergency Support Center consists of designated areas of the TECo Edison Plaza Building, Toledo, Ohio. It can house the key technical and non-technical groups of the Offsite Emergency Organization.

An interim Public Relations Center could be located in one of several areas (at the Construction Office Building, the Jefferson Jr. High School in Port Clinton, or the Edison Plaza), depending on the nature

of the emergency. Equipment and facilities are available at these locations to support timely communications and information dissemination on plant conditions and emergency operations. Press conferences may be held at the Edison Plaza, the Jr. High School, or at any other site designated by the Vice President - Public Relations.

The systems and equipment described in the following paragraphs ensure that the capability and resources are available to provide valid and continuing assessment throughout the course of an incident:

The Onsite Radiation Monitoring System detects, alarms, and initiates, if required, emergency actions when radiation levels or radionuclide concentrations exceed predetermined levels. To perform these functions, area, liquid, and atmospheric monitoring subsystems are installed. Descriptions of these three radiation monitoring subsystems are contained in the Plan. The data from these subsystems are displayed by readouts in the Control Room. Additionally, certain monitors alarm and are acknowledged on the Fire Detection System/Radiation Monitoring System (FDS/RMS) Console in the Control Room.

Fire protection at Davis-Besse is provided by the Fire Protection Water System and the Fire Detection System. The Fire Protection Water System is a full-loop, piped system that supplies water for sprinklers, deluge water spray, fire hydrants, and hose connections that are located to provide fire protection for all major areas of the plant and site. A 250,000 gallon Fire Water Storage Tank provides a source of water. The fire protection system also supplies the DBAB. It provides dry and wet sprinkler systems for both the Administration Building and its power structure.

The meteorological measurement system includes three levels of instrumentation on a 340 foot freestanding tower and one level of instrumentation on a 35 foot satellite tower. Both towers are located in the southwest corner of the site approximately 2800 feet from DBNPS. Wind direction and speed are measured at 250 and 340 feet on the freestanding tower and at 35 feet on the satellite tower. Measurements of delta T are made between 35 and 250 feet and between 35 and 340 feet. Instrumentation readouts from the towers are available in the Control Room. The ECC and TSC can also obtain this data through the DADS.

The meteorological instruments are calibrated on a quarterly basis. All maintenance and calibrations are performed in accordance with written procedures. Backup meteorological data are available from the Toledo and Cleveland National Weather Service stations. Arrangements have also been made to obtain backup meteorological information from the Enrico Fermi Nuclear Power Station in Newport, Michigan.

A Seismographic Monitoring System is available onsite which records on magnetic tape vibrations in the earth due to a local earthquake or other violent events. Power is supplied by rechargeable batteries so that loss of site power will not prevent system operation. The Plan



indicates that the licensee is seeking agreements with Bowling Green State University or the University of Toledo for acquisition of backup seismic data in the event that the station equipment is inoperable.

Lake level and precipitation data are available from the Port Clinton Water Works and Sewage Treatment plants, respectively.

## I. Accident Assessment

### Planning Standard

Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological condition are in use.

### Emergency Plan

The Plan contains system and radiological effluent parameter values characteristic of a spectrum of abnormal conditions and accidents. These parameter values and other reliable information are tabulated to cross reference initiating conditions for each of the four emergency classes. Specific alarm setpoints, both visual and audio, are in the Control Room to alert the operator.

The onsite Radiation Monitoring System, as described in the Plan, consists of area, liquid, and atmospheric monitoring subsystems. Data from these subsystems are displayed by readouts in the Control Room. Near-site and offsite sampling locations and the types of samples collected at each location are also identified in the Plan.

A summary description of the onsite meteorological measurements program and backup sources of meteorological data is contained in the Plan. Onsite meteorological data are available to the Control Room, ECC, and TSC. The Plan does not, however, describe or identify an atmospheric dispersion model which meets the design objectives of the NRC Class A model. This is an Open Item (50-346/82-26-01) pending completion by the licensee.

If an accident occurs which would make normal sampling and counting methods impractical, normal sampling procedures for station vent sampling would be followed, except that silver zeolite filters would be used for iodine collection. If radiation monitors RE 2024C and 2025C are off scale, a portable survey instrument on the sample line can be utilized with dose rate converted to  $\mu\text{Ci/cc}$ . For containment atmosphere sampling, a high pressure sampling assembly would be used for obtaining samples at the containment hydrogen analyzers. For reactor coolant system sampling, a shielded high pressure sampler is currently available for pressurizer samples. A permanent post accident sampling system for primary coolant and containment atmosphere sampling will be installed pursuant to NUREG-0737.

Assessment actions for each emergency class are outlined in the Plan. Radiation Monitoring Team (RMT) leaders and members are selected from personnel assembled in the OSC. Provisions are made in the Plan for two

onsite and three offsite RMTs, each consisting of two DBNPS personnel. The licensee has made provisions to obtain additional RMT personnel from the State of Ohio, U.S. EPA Region V, and from a group of corporations owning nuclear generating stations. The latter source of personnel are available through a mutual assistance agreement. In addition, the U.S. DOE will, upon request, dispatch a Radiological Assistance Program (RAP) team to advise and assist as needed.

Silver zeolite cartridges and single channel analyzers are in the ECC to facilitate radioiodine concentration determination. This provides a capability to detect and measure ambient radioiodine concentrations in the plume exposure EPZ as low as  $10^{-7}$   $\mu\text{Ci/cc}$  under field conditions. The Plan provides guidelines for relating various measured parameters such as milk, water, and gross contamination levels to dose rates for radiiodine, cesium, and strontium. Provisions are made for estimating integrated dose and comparing these estimates with the Protective Action Guidelines.

J. Protective Response (Closed 346/82-01-11)

Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Emergency Plan

Persons onsite when an Alert, Site Area, or General Emergency is declared, who do not have emergency assignments, are notified of the emergency classification by alarms or verbal announcement over the Public Address System. Persons in the owner controlled area, but beyond the range of the PA System, are notified by mobile plant security personnel equipped with bullhorns. These persons will be instructed to report to predesignated assembly areas for accountability, monitoring, and possible evacuation. Onsite emergency assembly points are the Control Room (Shift Supervisor's office), the Radiation Access Controlled Area, the Personnel Processing Facility, and the DBAB. Personnel are trained in the routes to the assembly area or are escorted by a trained employee. Evacuation routes from the nuclear power station structures and other buildings within the licensee controlled area are depicted in the Plan. EPIPs contain contingency plans for weather, traffic, and radiological impediments to evacuation. If the station must be evacuated, personal vehicles are utilized. All non-essential personnel are evacuated offsite to TECO's Lindsey Station for personnel monitoring and decontamination prior to release, however, decontamination facilities at the Lindsey Station are not adequately described in the Plan. These facilities will be described in the next revision to the Plan.

The Nuclear Security Supervisor is responsible for accountability. Accountability within the protected area can be accomplished in 30 to 45 minutes using the Security Computer. Once established, protected area accountability can be maintained throughout the emergency.

Onsite facilities where protective equipment and supplies are maintained are stated in the Plan. The exact location, types, and quantities of equipment and supplies stored at each facility are specified in the Station Administrative Procedures and Fire Protection Manual. A supply of thyroid blocking agent is maintained onsite. The criteria for administration of this agent are given in an EPIP.

The EDO is responsible for ensuring that dose projection and radiation level measurement data are provided to offsite authorities. Dose calculation methodology is specified in an EPIP. The Plan indicates that dose projections are made in accordance with recommendations in the Manual of Protective Action Guides and Protection Actions for Nuclear Incidents (EPA-520/1-75-001).

Evacuation time estimates for persons within the ten mile EPZ are provided as Appendix D to the Plan. Time estimates have been made for normal, adverse, and severe weather conditions. Permanent, transient, and special facility (school, day care centers, nursing home, and hospital) population segments are considered in the estimates. Means of notifying all population segments are discussed in the Plan. Maps depicting evacuation routes and care center locations are provided, as well as a listing of designated emergency shelters and their capacities.

The EDO provides protective action recommendations to State authorities. The Plan contains a summary of recommended protective measures within the plume exposure and ingestion exposure pathways. Recommended actions for the general public and emergency workers are based on projected whole body and thyroid dose. Expected local protection afforded by residential units and other shelter for direct and inhalation exposure are summarized in the Plan. The guidelines for ingestion pathway protective action recommendations also address ground, food, and water contamination possibilities. There are two action levels (preventative and emergency) at which protective action will be recommended for food and water contamination. One action level is employed for ground contamination. Recommended protective actions for the plume exposure and ingestion pathways are also functions of elapsed time. The Plan lists example protective actions to be recommended during the emergency phase (0.5 to 24 hours), intermediate phase (1 to 30 days), and the long-term accident phase (over 30 days).

K. Radiological Exposure Control (Closed 346/82-01-12)

Planning Standard

Means for controlling radiological exposures in an emergency are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Life Saving Activity Protective Action Guides.



## Emergency Plan

The Plan describes measures used to provide necessary assistance to persons injured or exposed to radiation and/or radioactive materials. Emergency measures for saving a life, measures to circumvent substantial exposures to population groups, or even preservation of valuable installations are described in the Plan. Exposure guideline for these emergency activities are consistent with the EPA Emergency Worker and Lifesaving Activity Protective Action Guide.

The senior TECo management individual present can authorize exposures in excess of normal limits and is responsible for maintaining all exposures below these values. If necessary, he will seek advice from the Radcon Operations Manager or from members of this staff. Personnel involved in emergency worker exposures must be volunteers.

Decontamination materials, specialized equipment and supplies, and portable first aid kits are available in the Decontamination Area. Portable health physics instruments for personnel monitoring and portal monitors are available at the Radiation Access Controlled Area (RACA). Decontamination showers and sinks, which drain to the radwaste system, and an eye-wash are also located in the Decontamination Area.

Actions levels for determining the need for decontamination of personnel and equipment are specified in the Davis-Besse Radiation Protection Manual. The Plan states that radiiodine decontamination procedures are specified in the Emergency Plan Supporting Procedures.

Personnel found to be contaminated shall undergo decontamination by Health Physics personnel (or other qualified personnel as specified in HP Procedures). Decontamination by trained Health Physics personnel is preferred. Measures taken to prevent the spreading of contamination may include isolating the affected areas, placing contaminated personnel in "clean" clothing before moving them, and decontamination of affected personnel, their clothing and equipment prior to release.

The Plan states that, for Site Area and General Emergencies, radiation monitoring efforts shall be increased and change-out of thermoluminescent dosimeters may be performed at frequent intervals. Emergency worker dose records will be maintained in accordance with the Davis-Besse Radiation Protection Manual.

Licensee access controlled areas are specified in the Plan. These areas serve as access control points for personnel entering or departing any controlled area. The Plan indicates that in-station contamination control shall be in accordance with approved procedures that are not further referenced. The Plan does not provide specific criteria for permitting return of areas and items to normal use.

L. Medical and Public Health Support

Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

Emergency Plan

The licensee has made arrangements, confirmed in writing, with a hospital (Magruder Memorial Hospital) located in the vicinity of the DBNPS for receiving and treating contaminated or exposed persons. In addition, several local physicians have signed letters of agreement to provide medical services in the event of radiation injuries to Station personnel. TECo has retained the REMS Corporation to coordinate medical emergency activities, provide medical consulting and training services, make available a Radiation Emergency Medical Team, provide backup radio-bioassay laboratory services, and to arrange for the specialized medical evaluation and care of radiation accident victims at the Peter Bent Brinham Hospital (Harvard School of Medicine) in Boston, Massachusetts.

TECo provides for onsite first aid treatment at the DBNPS. First aid teams, comprised of station personnel, have been established and trained. Chemistry and Health Physics Section personnel will assist in accident victim decontamination and evaluation of internal and/or external doses.

Carroll Township Emergency Medical Services has agreed, in writing, to provide ambulance service for radiation accident victims at the DBNPS. All persons involved in this service have received extensive first aid training. Ambulance service personnel receive training on the handling of contaminated victims and standard health physics practices during periodic tours of the DBNPS.

M. Recovery and Reentry Planning and Postaccident Operations

Planning Standard

General plans for recovery and reentry are developed.

Emergency Plan

General plans for recovery and reentry are described in the Plan. Titles and responsibilities of key individuals in the recovery organization are provided. The Emergency Duty Officer (EDO) and the Station Operations Manager have joint responsibility for determining and declaring when an emergency situation is stable and whether reentry and recovery actions may begin. The Engineering Support Director is responsible for developing, coordinating, and expediting plans and schedules for reentry and recovery operations. The Station Operations Manager, under the direction of the Operations Director, is responsible at the site for authorizing the start of reentry and recovery efforts and the return to normal operations when approved by the NRC. The

Company Nuclear Review Board (CNRB) will oversee the activities of the Engineering Support and Operations Directors to assure that all nuclear safety aspects of the operations are satisfied. The CNRB reports its findings to the TECo Emergency Director who shall take the actions that he deems appropriate for safe recovery operations.

Under the direction of the EDO, necessary Station and TECo personnel shall be assigned to assist in recovery operations. No special team members are pre-designated. Reentry phase goals have been established and include the completion of comprehensive radiation surveillance of plant facilities to define, isolate, and post radiological problem areas as appropriate. The Plan describes the established radiological monitoring program for detecting any offsite buildup of long-lived radionuclides and changes in ambient gamma radiation levels in the environment.

N. Exercises and Drills (Closed 346/82-01-13)

Planning Standard

Periodic Exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Emergency Plan

The Plan indicates that periodic drills and exercises shall be conducted to test the state of emergency preparedness. Each exercise or drill will have the following objectives:

- a. Ensure that the participants are familiar with their respective duties and responsibilities;
- b. Verify the adequacy of the DBNPS Emergency Plan and the methods used in the Emergency Plan Implementing Procedures;
- c. Test communications networks and systems;
- d. Check the availability of emergency supplies and equipment; and
- e. Verify the operability of emergency equipment.

Scheduled drills and exercises will be held involving appropriate offsite as well as onsite emergency personnel, organizations, and agencies. These drills and exercises shall be conducted to simulate, as closely as possible, actual emergency conditions. One or more exercises or drills may be held simultaneously. Scenarios shall be prepared that involve participation of several emergency teams and all or specific parts of the onsite and offsite emergency organizations including varying degrees of participation of State, County, and Federal organizations and agencies, and local service support personnel and organizations.

A Radiation Emergency Exercise will be conducted at least once per calendar year. The exercise will provide for coordination with, and participation of, offsite emergency response organizations, including those at the State and County levels. Exercises will be either full or small-scale, depending on the participants involved. About once every five years a joint exercise appropriate to a Site or General Emergency, that involves Federal, State, and County response organizations will be conducted. The scope of this exercise will test as much of the Plan as is reasonably achievable. In a six year period, an exercise will start between 6:00 p.m. and midnight, and another will start between midnight and 6:00 a.m. The Plan states that exercises should be conducted under different weather conditions and that some exercises should be unannounced.

The Plan provides for the following drills:

a. Medical Emergency Drill:

At least one drill per calendar year will be conducted involving the participation of some, if not all, of the local medical support personnel and organization (e.g., local physicians, ambulance services, hospital, etc.), and will involve cases of radiation overexposure and/or contaminated personnel and/or contaminated/injured personnel.

b. Fire Emergency Drill:

Fire drills will be conducted in accordance with the Station Technical Specifications.

c. Communications Links Test:

At least once a month, the communication links used for notification (i.e., DBNPS Control Room to Ottawa County Sheriff's Department, Ohio DSA, Ottawa County DSA Coordinator, EDO, Emergency Planning Supervisor, Operations Director, etc.) will be tested. At least once a month, communications between the NRC and the TSC, ECC, and Control Room will be tested. At least once per quarter, communications links used for contacting Federal agencies (i.e., NRC and the DOE) and the State of Michigan will be tested. Communication links between emergency centers and field assessment teams will be tested annually.

d. Health Physics Drill:

Health physics drills will be conducted semi-annually. Drills will involve response to, and analysis of, simulated elevated airborne samples and direct radiation measurements in the environment by radiation monitoring team members. Annual health physics drills will include analysis of inplant liquid samples with actual elevated radiation levels, including use of the post-accident sampling system.

e. Radiological Monitoring Drill:

Radiological monitoring drills are conducted during the annual Radiation Emergency exercise. This will include offsite monitoring. However, no other radiological monitoring drills are conducted which include collection and analysis of various sample media.

The Emergency Planning Supervisor's (EPS) responsibilities include planning, scheduling, and coordinating emergency planning related exercises and drills. The Nuclear Training Manager will assist the EPS in implementing these responsibilities. All exercises and drills are, however, subject to the approval of the Station Superintendent. The Vice President-Nuclear also must approve the annual Radiation Emergency Drill.

When a major drill or exercise is conducted, the EPS will:

- a. Assign personnel to prepare a scenario;
- b. Coordinate efforts with other participating emergency personnel, organizations and agencies;
- c. Obtain the approval of the Station Superintendent, and the Vice President - Nuclear, as required;
- d. Schedule a date for drill execution and assign observers;
- e. Critique the results of the drill;
- f. Assign personnel to correct any deficiencies;
- g. Ensure that deficiencies are corrected;
- h. Prepare and submit documentation to the Training Coordinator for record-keeping of training conducted.

Recommendations for revisions to the Plan and/or the EIPs and/or upgrading of emergency equipment and supplies as a result of an exercise or drill will be forwarded to the EPS by observers or participants. The EPS will submit proposed revisions to the Station Review Board for review. Recommended changes that are approved by this Board will be incorporated into the emergency planning program under the EPS's direction.

0. Radiological Emergency Response Training

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Emergency Plan

The Nuclear Training Manager is responsible for ensuring that all members of the DBNPS emergency response organizations receive appropriate training. Training program descriptions encompass the scope,



nature, and frequency of training. Personnel categories of training include: licensed operators, personnel responsible for assessment of emergencies, first aid teams, security force, fire brigade, offsite emergency support personnel, and emergency planning personnel.

In addition to specialized training for emergency response personnel, all other personnel at the DBNPS will take part in a formal training program that provides for the indoctrination of TECo employees and contractors. The goals of this training program with respect to emergency planning are to:

- a. Familiarize personnel with the scope, applicability, and implementation of the DBNPS Emergency Plan and Implementing Procedures;
- b. Teach the general duties and responsibilities assigned to all DBNPS personnel;
- c. Keep personnel informed of any changes in the DBNPS Emergency Plan and/or the Implementing Procedures; and
- d. Maintain a high degree of preparedness at all levels of the DBNPS organization.

The types of instruction given DBNPS employees and unescorted contractor personnel in order to meet these objectives are listed in the Plan.

The following offsite organizations will be invited to participate, at least annually, in a training program:

- a. Ohio State Disaster Services Agency;
- b. Ottawa County DSA Coordinator;
- c. Ottawa County Sheriff's Department;
- d. Ottawa County Departments and Commissioners;
- e. Local authorities;
- f. Ohio State Highway Patrol;
- g. Radiological Monitoring Teams of various agencies; and
- h. Local media personnel.

The program will address the importance of effective, coordinated emergency planning for licensee and governmental (Federal, State, and local) organizations. The program will include a review of the DBNPS Plan and Implementing Procedures, with emphasis given to the classification of emergencies, assessments, corrective and protective actions, and communications networks. At least annually, State Radiological Monitoring Teams will be invited to participate in a training program at DBNPS.

TECo will also provide orientation and training to local services support organizations as specified in respective letters of agreement. TECo anticipates that such training will be provided annually and will include the following topics:

- a. Interface with the nuclear security force during emergencies;
- b. Basic health physics indoctrination and training;
- c. The DBNPS facility layout; and
- d. Communications systems.

In addition, the local fire departments' training program will include:

- a. Permanent and portable onsite fire protection equipment;
- b. Interface with the DBNPS fire brigade during emergencies; and
- c. Review of applicable DBNPS EPIPs;

The training program for Magruder Memorial Hospital, local physicians, and ambulance service personnel having radiation emergency response functions will also include:

- a. Onsite medical treatment facilities, equipment, and supplies;
- b. Interface between DBNPS first aid teams, local physicians, hospital, and the REMS Corporation;
- c. Radiological aspects of emergency medical treatment; and
- d. Magruder Memorial Hospital radiation emergency procedures.

The training programs described in the Plan for the onsite emergency organization includes classroom training and practical drills in which individuals demonstrate their ability to perform their assigned emergency function. The Plan indicates that on-the-spot correction of erroneous performance during a drill will be made and that a demonstration of the proper performance will be offered by an instructor.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans (Closed 346/82-01-14)

Planning Standard

Responsibilities for plan development, review and distribution of emergency plans are established and that planners are properly trained.

Emergency Plan

The Plan describes the program for maintenance of Emergency Preparedness. The TECo Vice President - Nuclear has been assigned overall responsibility for emergency planning for the DBNPS. This responsibility

not only includes the Plan and Implementing Procedures, but also includes: the Plan's interrelationships with Federal, State, and County plans; agreement letters; corporate policy and plans; and other related plans, programs, and procedures. An Emergency Planning Supervisor (EPS) has been designated to assist the Vice President - Nuclear and the Nuclear Services Director on meeting these assigned responsibilities. Specific responsibilities delegated to the EPS include:

- a. Ensuring coordination of the DBNPS Emergency Plan with State Plans, County Plans, the DBNPS Security Plan, and the TECo Corporate Radiological Emergency Response plan;
- b. Ensuring that information, data, and procedures detailed in the EPIPs are consistent with the evidence provided in the DBNPS Emergency Plan;
- c. Ensuring that EPIPs are coordinated and interface properly with other procedures (e.g., Administrative Procedures, Security Procedures, Health Physics Procedures, and Training Procedures, etc.);
- d. Coordinating emergency planning related drills and exercises;
- e. Coordinating the review, audits, and updating of the DBNPS Emergency Plan and Implementing Procedures as described in the Plan; and
- f. Maintaining his knowledge current with respect to changes in the federal regulations and guidance that impact emergency planning activities.

The DBNPS Emergency Plan, including appended letters of agreement and plans of offsite organizations and agencies, will be reviewed and updated annually by the Emergency Planning Group. The Plan will also be reviewed annually by an independent group, either internal or external to TECo but with no immediate responsibility for the emergency preparedness program. Results and recommendations from the review will be documented. That part of the review involving State and local governments will be sent to the respective government agencies and retained on file for 5 years. In addition, a review of the DBNPS EAL's will be performed with State and local governments on an annual basis.

The TECo Company Nuclear Review Board (CNRB) is responsible for auditing, at least once every two years, the DBNPS Emergency Plan to verify compliance with the TECo Quality Assurance procedures, the fire protection program, internal rules and procedures, Federal regulations, and operating license provisions.

In addition, the EPS will, by virtue of his involvement with the DBNPS Emergency Planning Program, provide an ongoing review. Reviewers or auditors of the Plan and/or Implementing Procedures take into account TECo Corporate policy, State policy and plans, County plans, and the



various agreements and understandings with Federal, State, County and local support groups, agencies, and organizations. Results of all annual and biennial reviews and audits will be reported to the Vice President - Nuclear by the Emergency Planning Group.

EIPs will be incorporated into the DBNPS procedures program. As such, the Implementing Procedures will be prepared, reviewed, approved, controlled, distributed, and revised in accordance with DBNPS Administrative Procedures. Document holders will receive revisions to the EIPs in a controlled manner as they are issued. In addition, the Implementing Procedures will provide guidance to document holders on how to make comments and recommendations concerning the Emergency Planning Program to TECo. Revisions to the DBNPS Emergency Plan will also be administratively controlled.

The Plan contains a detailed listing of supporting procedures and their sources. Appendix A to the Plan lists, by title, procedures required to implement the Plan. The Plan contains a Table of Contents and a detailed cross reference to Planning Standard Evaluation Criteria.

#### Conclusion

Based on our review of the licensee onsite emergency preparedness, we conclude that the Davis-Besse Emergency Plan meets the planning standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. The review of the permanent ERFs will be discussed in a separate report.