Public Service Company of Colorado

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September 17, 1982
Fort St. Vrain
Unit No. 1
P-82400

Mr. John T. Collins, Regional Administrator
Region IV
U. S. Nuclear Regulatory Commission
611 Ryan Plaza Drive
Suite 1000
Arlington, Texas 76011

SUBJECT: NRC Emergency Appraisal Audit-
Appendix B Improvement Items

REFERENCE:
1. P-81308, December 7, 1981
2. P-82056, February 26, 1982
3. P-82116, April 23, 1982
4. P-82117, April 23, 1982
5. P-82118, April 23, 1982
6. P-82119, April 23, 1982
7. G-82249, August 11, 1982
8. P-82328, August 19, 1982
9. P-82375, September 8, 1982
10. G-82248, August 11, 1982
11. G-82163, June 11, 1982

Dear Mr. Collins:

In accordance with correspondence received from Mr. G. L. Madsen of your office dated August 11, 1982, (G-82248) we are forwarding PSC's responses to Appendix B items of the Emergency Preparedness Appraisal Audit (G-82163). The Appendix B items in some cases are identical to, or very similar to items already responded to as a result of our Appendix A audit responses (P-82328), or as a result of the 1982 emergency exercise, FOSAVEX 82 (P-82375).

PSC was concerned with the regulatory status of many individual findings, and as a result met with Mr. Charles Hackney of your office, Mr. Dave Rohrer of Emergency Preparedness in Bethesda, Maryland, and Mr. George Kuzmycz, NRC Project Manager for FSV on July 15, 1982. At that meeting, the status of the individual appraisal findings was discussed, and the PSC responses contained herein are largely reflective of discussions and explanations received from the NRC at that meeting.

If you or your staff have questions regarding our responses please contact me or Mr. L. M. McBride at (303) 785-2224.

Very truly yours,

D. W. Warembourg

D. W. Warembourg
Manager, Nuclear Production

DWW/lsb

cc: G. L. Madsen
C. A. Hackney
D. Rohrer
G. Kuzmycz

APPENDIX B

PREPAREDNESS IMPROVEMENT ITEMS

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to accurately reflect changes to the licensee's existing organizational structure (267/82-01-01) (see section 1.6);

PSC RESPONSE

This will be completed by October 1, 1982 with a revision to the FSV Radiological Emergency Response Plan (RERP) and a re-issue of RERP implementing procedure RERP-ORG, "FSV Emergency Organization and Responsibilities."

NRC IMPROVEMENT ITEM

Develop and implement explicit and specific functional responsibilities and authorities for all persons assigned duties for the various emergency preparedness planning and coordination functions (267/82-01-03) (see section 1.6).

PSC RESPONSE

PSC does not feel there is a need for a document that defines/assigns duties for emergency preparedness planning and coordination functions other than those already defined in the RERP and PSC Job Descriptions. The concern of the NRC Auditor centered around the fact that the site staff, along with an outside contractor performed the detailed planning and writing functions, and that he could not find an explicit statement in the available documents concerning the responsibilities of the staff and the outside contractor. A statement, in memorandum form, of the responsibilities and commensurate authorities will be developed to address this matter by December 31, 1982.

NRC IMPROVEMENT ITEM

Develop and implement a program for training individuals, who are assigned emergency planning responsibilities, which will enable them to attain and maintain a state-of-the-art knowledge in the field of emergency preparedness (267/82-01-04) (see section 1.6).

PSC RESPONSE

PSC is participating in INPO's programs for training and industry exchange regarding new requirements, ongoing problems, new ideas, etc. at present. INPO also plans to conduct site visits to evaluate Fort St. Vrain's Emergency Preparedness Program. The INPO program, along with PSC's interface with an outside contractor, will provide the necessary "state-of-the-art" training and

knowledge in emergency planning to support the Fort St. Vrain Emergency Plan.

NRC IMPROVEMENT ITEM

Evaluate the adequacy of existing staff assigned responsibility for emergency preparedness planning and coordination, and develop a means to augment existing staff when necessary (267/82-01-05) (see section 1.6).

PSC RESPONSE

PSC did evaluate the adequacy of the existing staff in preparing the emergency plans. This item was the topic of several discussions during the appraisal audit, wherein the PSC staff discussed the qualifications and size of the staff performing planning and coordination functions along with those of the outside contractor used to augment the PSC staff. The auditor seemed to dislike the use of the outside contractor in specific, with which PSC does not agree. Considering the size of Fort St. Vrain, the current staff is adequate, as is the use of a major A/E firm to augment the PSC staff when required.

NRC IMPROVEMENT ITEM

Develop and implement methods to provide substantive input from plant staff, down to working level, to the development of emergency preparedness plans and procedures (267/82-01-06) (see section 1.6).

PSC RESPONSE

There currently exists a formal method of providing this type of input from plant staff, via the mechanism of Corrective Action-Action Requests (CA-ARs) and Procedure Change-Action Requests (PC-ARs) which is described in the Administrative Procedure Manual (APM), procedure G-3, "Action Request Preparation and Processing." All station personnel are made aware of this mechanism of requesting plan and procedure changes as a part of the annual General Employee Training (GET). To provide additional assurance that this subject is handled, the training department has been requested to assure that this item is addressed. We consider this item closed.

NRC IMPROVEMENT ITEM

Develop and implement specific selection and qualification criteria for individuals assigned to perform emergency preparedness development activities (267/82-01-07) (see section 1.6).

PSC RESPONSE

The matter of PSC's methods for selection and the requisite qualifications of PSC personnel performing emergency preparedness development activities and the actual emergency actions and decision making (Item 82-01-14) was the subject of numerous discussions with the auditors. PSC uses selection and qualification criteria based upon normal job functions and background experience as contained in personnel job descriptions and background requirements. The use of job titles and personnel qualified to fulfill responsibilities described in the job descriptions by job title ensures that the best available PSC personnel are involved in the planning and implementation of all phases of emergency preparedness. In our opinion, the use of job titles and job descriptions to define specific selection and qualifications criteria provides better administrative control over the selection process for emergency planning activities. PSC intends to maintain the current system for selection of emergency planning personnel.

NRC IMPROVEMENT ITEM

Develop and implement quality assurance procedures to evaluate the effectiveness of the emergency planning development training (267/82-01-08) (see section 1.6).

PSC RESPONSE

In accordance with the FSV Technical Specifications, the Quality Assurance Department currently audits the Training Department records. These audits cover all aspects of training. The training records regarding emergency planning development are audited to ensure that appropriate individuals have received the necessary training.

NRC IMPROVEMENT ITEM

Provide formal assignment of all individuals held responsible to perform emergency planning duties (267/82-01-09) (see section 1.6).

PSC RESPONSE

The assignment of responsibility for emergency planning is contained in the job descriptions for the Manager of Nuclear Production, the Technical/Administrative Services Manager, the Radiation Protection Manager, and the Training Supervisor. The individuals, as a function of their responsibilities, will utilize their technical staff to perform emergency planning tasks as appropriate. The use of a technical staff to perform emergency planning tasks such as writing procedures and conducting training

within their fields of expertise is a good management practice, in our opinion. The formal assignment of responsibility will remain at the supervisory and management level as assigned by job description. Detailed tasks, at the direction of management, are assigned to performance level staff at the discretion of individual managers and supervisors, however, the statement, in memorandum form, referenced in our response to Item 267/82-01-03 will be utilized to define functional responsibilities for those personnel directly and specifically assigned to the various command posts. This item is closed.

NRC IMPROVEMENT ITEM

Augment existing general employee training (GET) to ensure that all site personnel are adequately trained in the general provisions of the RERP, their responsibilities during an emergency, and how to provide input to correcting deficiencies they identify (267/82-01-10) (see section 1.6).

PSC RESPONSE

Training of all station personnel is currently conducted in GET and GET retraining. This training covers the general provisions of the RERP and individual responsibilities during an emergency. A formalized program of what is currenty covered will be written by May, 1983.

NRC IMPROVEMENT ITEM

Unambiguously define the authorities, responsibilities, and duties of all individuals, down to the working level, assigned to the licensee's emergency organization (267/82-01-11) (see section 2.3).

PSC RESPONSE

This item has been answered, in full, with the issue of RERP implementing procedure RERP-ORG, "FSV Emergency Organization and Responsibilities," effective August 4, 1982.

NRC IMPROVEMENT ITEM

Develop a program for training individuals who are assigned emergency action responsibilities which will enable them to attain and maintain a state-of-the-art knowledge in the field of their assigned emergency action areas (267/82-01-12) (see section 2.3).

PSC RESPONSE

As was stated in our response to Audit Item 82-01-04, PSC is participating in INPO's programs for training and industry exchange

of new requirements, ongoing problems, new ideas, etc. at present. INPO also plans to conduct site visits to evaluate Fort St. Vrain's Emergency Preparedness Program. The intent is to send key individuals to the INPO seminars and to use those individuals to train onsite staff.

NRC IMPROVEMENT ITEM

Include a list of approved licensee personnel (by name) in the EPIP, who have been selected and are qualified to perform activities within the functional areas of the licensee's emergency organization to which they are assigned (267/82-01-13) (see section 2.3).

PSC RESPONSE

PSC does not agree with this finding. PSC assigns personnel to the emergency organization by job title and not by name. As was discussed in response to NRC item 82-01-07 above, PSC uses the qualifications necessary to perform job functions for a position within the normal PSC structure to select personnel for the emergency organizations to ensure that the best available PSC personnel are involved in radiological emergency response at Fort St. Vrain. The use of job titles, as opposed to names, performs the same function without needless revisions to the RERP and RERP implementing procedures, given normal intercorporate transfer of staff. PSC intends to continue the current practice of assignment by job title. This list of licensee personnel, by name, is also included in the RERP implementing procedures and is entitled "RERP Phone Lists". This item is closed.

NRC IMPROVEMENT ITEM

Develop and implement specific selection and qualification criteria for all individuals assigned to perform emergency actions and decision making (267/82-01-14) (see section 2.3).

PSC RESPONSE

This item was answered in response to NRC item 82-01-07 above. The same selection and qualification process is used for both emergency planners and licensee staff performing emergency response activities.

NRC IMPROVEMENT ITEM

Develop quality assurance procedures to evaluate the effectiveness of the emergency action training for the various functional areas (267/82-01-15) (see section 2.3).

PSC RESPONSE

The annual audit that is performed by QA, in conjunction with the NFSC, includes a close look at the training necessary for individuals having specific responsibilities during an emergency situation. The Training Department has thorough records which include a list of the personnel requiring functional area training, as well as the presentation outline that summarizes the information taught for each area.

During each emergency drill, auditors are placed at strategic locations to observe the conduct of individuals having designated responsibilities for each functional area. By comparing the actions of the responsible individuals to the required actions defined in the Radiological Emergency Response Plan, it can be determined whether the necessary training was performed, and if that training was adequate. The auditors present their findings during the ensuing drill critique and adjustments are made to the training program if necessary.

NRC IMPROVEMENT ITEM

Develop and implement a method of formal assignment of all personnel in the emergency response organization down to the working level (267/82-01-17) (see section 2.3).

PSC RESPONSE

As was stated in response to NRC item 82-01-03, above, a statement, in memorandum form, will be developed to provide for formal assignment of PSC personnel in the emergency response organizations by December 31, 1982. We do not intend to include craft personnel in the memorandum of assignment, as such a broad assignment would be chaotic to administer.

NRC IMPROVEMENT ITEM

Develop and implement procedures to ensure that all emergency response functions, as identified in Table B-1 of NUREG-0654, Revision 1, will be performed in the control room until the other emergency centers are manned and operational (267/82-01-18) (see section 2.3).

PSC RESPONSE

This subject has been addressed in two manners. First PSC in correspondence from D. W. Warembourg to Brian Grimes (G-81308), December 7, 1981 specifically addressed FSV staffing with regards to NUREG-0654 Table B-1 staffing requirements. Additionally, these same responsibilities are addressed in the new RERP implementing procedures RERP-ORG, CR-UE, and CR-ALERT. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to properly reflect the true nature of the FCP and the TSC relationship and to the authorities and responsibilities of their respective directors (267/82-01-19) (see section 2.3).

PSC RESPONSE

This NRC item appears to relate to the following comment in the first paragraph on page 8 of the audit report:

> "The auditors noted that the RERP and EPIPs indicated that the overall command responsibility of the PSC response organization rested with the Corporate Emergency Director (CED) at the FCP. However upon review of the responsibilities of that person and the support groups he had at the FCP, the auditors determined that the real direction of the emergency responses was performed by the TSC Director in the onsite TSC."

PSC takes exception to this comment, and finds no need for revision to either the RERP implementing procedures or the RERP. It is apparent that the auditors overlooked the following sections of the RERP serving to make clear that site activities are centered at the TSC, that the TSC Director serves to advise the CED regarding technical aspects of the emergency, and that the CED is in fact clearly the individual with the ultimate control over the direction of the PSC emergency response:

(1) Section 7.1.1 of the RERP

> "Site emergency command activities will be centered in the Technical Support Center (TSC) located..."

(2) Section 7.1.2 of the RERP

"The Forward Command Post is the focal point for the coordination of onsite and offsite emergency response activities. Management and technical personnel assigned to the FCP are responsible for protective action recommendations and liaison with offsite authorities and response facilities. The FCP serves as the point from which the Corporate Emergency Director (CED), Vice President of Electric Production, exercises overall control of the FSV Emergency Response Organization."

(3) Section 5.2.1.b of the RERP

"The TSC Director - (Manager, Nuclear Production) is in command of onsite emergency operations. The TSC Director is authorized to initiate emergency actions, including declaring a particular class of emergency and providing protective action recommendations to offsite authorities."

(4) Section 5.2.1.a of the RERP

"The Corporate Emergency Director (CED) - (Vice President of Electric Production) is in command of PSC emergency operations and is responsible for direction and coordination of:

1. PSC onsite and offsite emergency functions;

2. Interface between PSC and local/state/federal emergency response activities;

3. Transmission of plant status updates and radiological release data to FCP and State EOC emergency response and media center personnel;

4. Notification of state and local agencies concerning recommended protective actions;

5. Provision of administrative, technical, and logistic support to station emergency operations; and,

6. Continuity of emergency organization resources."

(5) Section 6.1 of the RERP

"Emergency center functions remain constant for ALERT, SITE AREA EMERGENCY, and GENERAL EMERGENCY classifications. Personnel/equipment augmentation may vary according to specific circumstances. The functions, as shown on Figure 5.2-2 include:

Technical Support Center

Command (Onsite)

Plant Condition Assessment

Recommendation of Corrective Actions

Radiological Consequence (Dose Projections)

Health Physics Assessment

Notification/Communications

Onsite Protective Action

Offsite Communications

Forward Command Post (PSC functions only)

Command (PSC Overall)

Government Notification/Communications

Radiological Assessment Coordination

Logistics Support

Media Relations"

We consider this item closed.

NRC IMPROVEMENT ITEM

Develop and implement specific procedures to govern the use and coordination of all outside support organizations and contractors during emergencies (267/82-01-21) (see section 2.3).

PSC RESPONSE

PSC agrees with this finding to the extent that a PSC organization should be defined as the primary contact for outside contractor assistance and the outside contractor should also provide a single point contact within that organization. Such a document or a revision to the RERP implementing procedures will be developed and implemented by August, 1983.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to unambiguously identify the authorities, responsibilities, and limits of actions of the corporate, contractor, private organizations, and local services support groups during emergencies (267/82-01-22) (see section 2.3).

PSC RESPONSE

The Letter of Agreement with outside contractors defines the levels of general support available and the scope of support capability available. Any further amplification of responsibility and limits of actions would be academic in our opinion, because any actions would be situation dependent and of very little use during an actual emergency situation. The current Letters of Agreement (Appendix 10.A of the RERP) may be too general, however, and these will be reviewed during our review of the use of response organizations, as responded to in NRC audit item 82-01-21.

NRC IMPROVEMENT ITEM

Establish and implement a formal radiological emergency response training program to provide specialized training and annual retraining for all individuals assigned to each of the functional areas of the emergency organization (267/82-01-23) (see section 3.3).

PSC RESPONSE

Training in each of the functional areas of the emergency organization, (CR, TSC, PCC, FCP, ECP, SEOC), is currently conducted involving individuals assigned to those areas. This training provides knowledge as to individual job duties, responsibilities, and authorities, as well as overall plan implementation. Drills are included as a part of this training. A formalized program including lesson plans, handouts, and acceptance criteria will be developed by May, 1983.

NRC IMPROVEMENT ITEM

Provide in the new training program: formal classroom instructions and practical demonstration drills; walk throughs; formal lesson plans; and a means of evaluating student performance; i.e., written tests as well as evaluations of individual performance in drills and walk-throughs. Lesson plans shall include student performance objectives (267/82-01-24) (see section 3.3).

PSC RESPONSE

This requirement will be met by May 1983 as reflected in commitment to item 82-01-23.

NRC IMPROVEMENT ITEM

Develop and implement a formal training program to familiarize all site employees with the changes in the RERP and EPIP's if and when substantive changes are made to the respective responses by individuals assigned to the emergency organization (267/82-01-25) (see section 3.3).

PSC RESPONSE

The Operating Information Assessment Group (OIAG) meets weekly, and has responsibility to evaluate the needs of specific groups of plant personnel to review appropriate procedure changes. Affected personnel are required to review indicated procedures assigned by the OIAG, and indicate completion of reviews by signature. This training program has been developed and implemented, and is reflected in Administrative Procedure G-7. Section 4.2.6 is reproduced to show this procedure.

> "4.2.6 An Operating Information Assessment Group is established to review operating information pertinent to plant safety from both within the Fort St. Vrain organization and outside sources to determine if such information is applicable to Fort St. Vrain. The Operating Information Assessment Group will be composed of the Superintendent of Operations, Technical/Administrative Services Manager and Training Supervisor or their assigned delegates. The group will meet periodically to review and assess documents pertaining to the requirements of NUREG-0737. Information deemed pertinent will be sent to the appropriate department supervisor for dispersal either by implementing into procedures, review by department personnel, retraining sessions, or other methods deemed necessary by the department supervisor. Department supervisors will assure that

appropriate actions are taken with regard to the information by appropriate department employees. Documentation of the required actions and the compliance by the affected employees will be forwarded to the Operating Information Assessment Group for review and then for transmittal to the Training Department for filing in Department training files. It will be the Operating Information Assessment Group's duty to assure that conflicting or contradictory materials are not sent out.

Quality Assurance personnel will audit the program on a periodic basis."

We consider this item closed.

NRC IMPROVEMENT ITEM

Revise the TPAM to include the new Section 4.6, to remove the redundancy between the sections, and to revise Forms G-8 and G-9 to reflect the current training (267/82-01-26) (see section 3.3).

PSC RESPONSE

The situation response training section of the TPAM will be revised to reflect the formalized training programs to be developed. This revision will resolve this item. Projected date of completion is May, 1983.

NRC IMPROVEMENT ITEM

Rectify the discrepancy between the training requirements of RERP Figure 8.1-1 and TPAM, Forms G-8 and G-9 (267/82-01-27) (see section 3.3).

PSC RESPONSE

See response to NRC Improvement Item 267/82-01-26.

NRC IMPROVEMENT ITEM

Rectify the discrepancy between the training requirements of TPAM Section 4.1.1.1 and Section 2.2 (267/82-01-28) (see section 3.3).

PSC RESPONSE

GET retraining will be conducted on an annual basis in the future and this change will be reflected in the TPAM by May, 1982.

NRC IMPROVEMENT ITEM

Develop and implement formal training requirements for the offsite organizations and specify those requirements in the RERP and EPIP's (267/82-01-29) (see section 3.3).

PSC RESPONSE

Conducting training for all offsite organizations will be too encompassing and serve little purpose for those organizations who are on letters of retainer for very remote scenarios. PSC will evaluate the current offsite support organization list and will provide a program to train those organizations that would be actively involved in radiological emergencies at Fort St. Vrain. Our evaluation should be complete and a training program implemented by May, 1983.

NRC IMPROVEMENT ITEM

Develop and implement formal training lesson plans which clearly state student performance objectives for local support service groups (267/82-01-30) (see section 3.3).

PSC RESPONSE

A formal training program will be developed for the local support service groups defined in the RERP by May, 1983.

NRC IMPROVEMENT ITEM

Develop and implement formal selection criteria to be used in selecting training instructors (267/82-01-31) (see section 3.3).

PSC RESPONSE

Selection criteria can be established and reflected in TPAM revision to Situation Response Training Section by May, 1983.

NRC IMPROVEMENT ITEM

Develop and implement a written examination for the health physics GET (8-hour class) (267/82-01-32) (see section 3.3).

PSC RESPONSE

The Fort St. Vrain job-related Health Physics course is currently being reevaluated based on recent recommendations from NRC, INPO, and ANI. The course will be restructured to include a written examination by June 30, 1983.

NRC IMPROVEMENT ITEM

Have a member of the Health Physics Department conduct an annual formal training program for St. Luke's Hospital emergency response staff (267/82-01-33) (see section 3.3).

PSC RESPONSE

The St. Luke's Hospital emergency response staff training will be evaluated by the Radiation Protection Department, and additional training will be provided as required. This will be done by November 15, 1982.

NRC IMPROVEMENT ITEM

Develop and implement a formal training program for health physics and radiochemistry technicians (267/82-01-34) (see section 3.3).

PSC RESPONSE

Emergency training will be incorporated as part of the Radiation Protection Department training program. This program will be implemented by October 1, 1982.

NRC IMPROVEMENT ITEM

Develop and implement acceptance criteria to be used in evaluating junior HP technician proficiency (267/82-01-35) (see section 3.3).

PSC RESPONSE

Acceptance criteria for Radiation Protection personnel proficiency will be developed and implemented by October 1, 1982.

NRC IMPROVEMENT ITEM

Establish a method for ensuring that new employees cannot enter a radiation zone prior to receiving health physics training (267/82-01-36) (see section 3.3).

PSC RESPONSE

A radiation protection training instructor has been included in the Fort St. Vrain 1983 Operating Plan. The frequency of health physics training will be increased upon acquisition of the training individual. Although a specific implementation date cannot be given at this time, we anticipate that action on this item will be implemented early in 1983.

NRC IMPROVEMENT ITEM

Provide dedicated emergency portable radiological monitoring equipment and protective clothing in the control room (267/82-01-38) (see section 4.1.1.1).

PSC RESPONSE

The control room is currently monitored for radiation and airborne radioactive materials. Dedicated SCBA's have been provided, as well as airline breathing apparatus. Protective clothing is available in the Health Physics access area. We feel that no further action is required on this item.

NRC IMPROVEMENT ITEM

Develop and implement a specific listing of all emergency equipment and supplies necessary for the full activation of the TSC (267/82-01-41) (see section 4.1.1.2).

PSC RESPONSE

Health Physics Procedure HPP-37 is currently being revised to incorporate this recommendation. The revised procedure will be effective by October 1, 1982.

NRC IMPROVEMENT ITEM

Complete the full installation of HVAC system for the TSC, including the necessary detectors and controls to initiate damper and full filter operation during emergencies (267/82-01-42) (see section 4.1.1.2).

PSC RESPONSE

This installation has been completed. We consider this item closed.

NRC IMPROVEMENT ITEM

Revise the RERP and EPIP's to reflect the names, locations, and routes to the alternate PCC(s) (267/82-01-43) (see section 4.1.1.3).

PSC RESPONSE

The RERP, in section 7.1.3, will be revised to state all three alternate offsite PCCs locations, as well as to provide adequate reference to RERP implementing procedure RERP-PCC, "Personnel Control Center Procedure," which has always contained maps showing routes to the alternate offsite PCCs.

This item will be completed by October 1, 1982, with Issue 3 of the RERP.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to specifically identify all "Emergency Stations" and "PCCs" (267/82-01-45) (see section 4.1.1.3).

PSC RESPONSE

This item is already resolved. There are now four onsite Personnel Control Centers (PCCs), two primary and two alternate, located so as to provide reasonable assurance that the PCC will remain onsite regardless of wind direction. These PCCs are clearly identified in sections 6.4.1.a.3 and 7.1.3 of the RERP, as well as in RERP implementing procedures RERP-PCC, "Personnel Control Center Procedure," and CR-ALERT, "Control Room ALERT, SITE EMERGENCY, GENERAL EMERGENCY procedure."

The Emergency Stations have been reduced to five (5) locations as described in procedure G-5, "Personnel Emergency Response" of the Administrative Procedure Manual (APM). This procedure is referenced in the RERP, and the procedures previously utilized, as described in section 4.1.1.3 of the audit report, have been deleted and are no longer referenced in the RERP.

We consider this item closed.

NRC IMPROVEMENT ITEM

Demonstrate that a fixed monitor has a range of at least 5 mCi/cc of mixed noble gases and that ambient radiation fields will not interfere with this measurement (267/82-01-46) (see section 4.1.1.5.3).

PSC RESPONSE

We currently have installed instrumentation with an upper range of approximately 13 µCi/cc of mixed noble gases. The anticipated concentration in the reactor plant stack following a design basis accident is approximately 5E-2 µCi/cc. NRC Region IV Health Physics inspectors recently reviewed this area as part of their

NUREG-0737 nspection, and indicated that an evaluation of the adequacy of our exis:ing instrumentation would be performed by the NRC. In addition, Oak Ridge National Laboratories (ORNL) is continuing their source term evaluation for FSV. We will await the results of the above analyses prior to taking any action on this item.

NRC IMPROVEMENT ITEM

Develop and implement a procedure for transferring appropriate secondary and/or primary calibration sources from the FSV Radiochemistry Laboratory to the Ft. Collins laboratory in the event that the FSV laboratory is not functional during emergencies (267/82-01-47) (see section 4.1.1.5.5).

PSC RESPONSE

As the radiochemistry laboratory is located in the Technical Support Building, the probability that the laboratory would not be functional during emergencies is extremely low. Also, all of the radiochemistry calibration sources are in the microcurie range and all read less than one millirem per hour. Finally, Health Physics procedure HPP-30, "Radioactive Material Classification, Packaging, and Labeling" contains guidance on the shipment of radioactive material, and would be utilized for shipment under any conditions. It is our position that no further action is required on this item.

NRC IMPROVEMENT ITEM

Provide direct, immediate, and unobstructed access to the first-aid facility (267/82-01-53) (see section 4.1.2.2).

PSC RESPONSE

The First Aid Room has been moved to its permanent location on grade level in the administrative office area. The key to the first aid supply cabinet in the First Aid Room will remain with the on-shift Shift Supervisor in order to reduce loss of first aid supplies.

NRC IMPROVEMENT ITEM

Develop and implement procedures that ensure that dedicated first-aid equipment is controlled by a documented inventory program (267/82-01-54) (see section 4.1.2.2).

PSC RESPONSE

A monthly Preventive Maintenance Operation (PMO) will be issued by Scheduling to the Training Department to inventory the dedicated first aid equipment. The completion date for this is May, 1983.

NRC IMPROVEMENT ITEM

Provide and maintain up-to-date FSV medical emergency procedures in the first-aid facility (267/82-01-55) (see section 4.1.2.2).

PSC RESPONSE

This item has been resolved by placing controlled copy 2-11 of the Medical Emergency Plan (MEP) in the first aid room.

NRC IMPROVEMENT ITEM

Incorporate the provisions of the FSV Medical Emergency Plan into the FSV RERP and EPIP's (267/82-01-56) (see section 4.1.2.2).

PSC RESPONSE

This item has already been resolved in revisions to the RERP and RERP implementing procedures subsequent to the date of the audit. Section 6.5.4 of the RERP, Medical Treatment, and Appendix D of the RERP reference the provisions of the FSV Medical Emergency Plan (MEP). In addition, the Personnel Control Center Procedure, RERP-PCC of the RERP implementing procedures makes several references to the provisions of the MEP.

We consider this item closed.

NRC IMPROVEMENT ITEM

Upgrade personnel monitoring procedures and station training to ensure that all station personnel are aware of the limitations of personnel monitoring equipment and the proper procedures to be used to self-monitor themselves (267/82-01-58) (see section 4.1.2.3).

PSC RESPONSE

The above guidance has been provided to all personnel via memorandum PPC-82-1543, dated July 27, 1982. Frisking is discussed and performed as a required portion of General Employee Training. These requirements will be reflected in training programs by May, 1983.

NRC IMPROVEMENT ITEM

Include provisions for control of radioactive wastes during decontamination of personnel at all assembly areas (267/82-01-59) (see section 1.2.3).

PSC RESPONSE

A barrel for radioactive waste is located in each Personnel Control Center, as is waterless hand cleaner and soap. Individuals with gross contamination will be transported to St. Lukes Hospital in accordance with the Fort St. Vrain Medical Emergency Plan. We consider this item closed.

NRC IMPROVEMENT ITEM

Provide cofferdams and shower curtains at the two entries into the personnel decontamination shower to prevent the unnecessary spread of contamination to the adjacent area during use (267/82-01-60) (see section 4.1.2.3).

PSC RESPONSE

We concur with this recommendation, and a Design Change Action Request will be written to the Nuclear Engineering Division for installation.

NRC IMPROVEMENT ITEM

Incorporate the "RERP" Public Information Manual (PIM) into the EPIP's and docket the PIM as a part of your RERP and EPIP sumbittals to the NRC (267/82-01-61) (see section 4.1.4).

PSC RESPONSE

The Public Information Manual (PIM) is treated as an Emergency Preparedness document, and as such was transmitted to the NRC for docketing, reference, and review on April 23, 1982 via separate transmittals with other related documents to D. Rohrer, C. Hackney, J. T. Collins, and D. Eisenhut (P-82116, P-82117, P-82118, and P-82119, respectively). This document is not considered to be an RERP implementing procedure, and as such, will not be subject to the format of those procedures. We consider this item closed.

NRC IMPROVEMENT ITEM

Revise and consolidate station prodedures so that there is a concise nongeneric listing of all dedicated emergency equipment and suppliers and the quantity necessary to support all areas of endeavor during the highest classification of emergency event (267/82-01-62) (see section 4.2.1.1).

PSC RESPONSE

Health Physics procedure HPP-37 is currently being revised to incorporate this recommendation. A list of equipment suppliers is maintained by Health Physics for re-order purposes. The revised procedure will be effective by October 1, 1982.

NRC IMPROVEMENT ITEM

Develop and implement inventory procedures and emergency use procedures, and provide for operational checking of instruments prior to use (267/82-01-63) (see section 4.2.1.1).

PSC RESPONSE

Inventory procedures currently exist in Health Physics procedure HPP-37. Emergency use instrument operational procedures are identical to normal use procedures and are currently contained in the Health Physics Procedures. Provisions for operational checking of instruments prior to use will be incorporated into the Health Physics Procedures by December 31, 1982.

NRC IMPROVEMENT ITEM

Develop and implement instructions for the proper storage and maintenance of charcoal and silver zeolite filters (267/82-01-64) (see section 4.2.1.1).

PSC RESPONSE

Silver zeolite cartridges are currently stored in plastic bags. We are currently in the process of obtaining additional guidance from the manufacturer and will implement storage and maintenance guidance when it is received.

NRC IMPROVEMENT ITEM

Install a high-range radiation monitor on the reactor refueling floor (267/82-01-65) (see section 4.2.1.2).

PSC RESPONSE

The Nuclear Engineering Division has been assigned a Design Change Action Request to procure and install a high-range radiation monitor on the refueling floor.

NRC IMPROVEMENT ITEM

Establish the level of uncertainty associated with the use of meteorological information from the proposed primary system in the dose projection process and provide direction such that recommended protective actions are adequate (267/82-01-66) (see section 4.2.1.4).

PSC RESPONSE

It must be pointed out that revision 1 to Regulatory Guide 1.23 has never been officially issued, and as such, an audit against its proposed requirements is a moot subject. NRC Regulatory Guide 1.97, Revision 2, cites specific meteorological parameters of interest and indicates that the implementation requirements will be based upon a revision 1 to Regulatory Guide 1.23. Additionally, NUREG-0654, Revision 1, Appendix 2 cites the requirements of the as-yet unpublished Regulatory Guide 1.23, Revision 1 as a basis for meteorological system implementation acceptability. NUREG-0737, item III.A.2 also cites Regulatory Guide 1.23, Revision 1 as guidance in developing an acceptable meteorological monitoring system.

PSC's new sixty (60) meter onsite meteorological tower does in fact provide the Control Room and Technical Support Center the meteorological parameters specified in Regulatory Guide 1.97, Revision 2, as well as many other values. In addition, PSC has instrumentation to provide backup via an onsite ten (10) meter backup meteorological tower which currently provides readout into the plant computer system, a National Oceanic and Atmospheric Administration (NOAA) computer with modem dial-up availability, as well as remote readout adjacent to the tower.

Instrument quality and reliability is similar to that provided in proposed Regulatory Guide 1.23, Revision 1. As PSC has developed this system in rather close conformance to NRC standards and proposed standards (which are expected to be less strict when adopted), PSC feels that no such analysis is justifiable or warranted at this time. We consider this item closed.

NRC IMPROVEMENT ITEM

Identify within the RERP and EPIP's how to gain access to alternate meteorological sources, how to use (e.g., adjust) available information, and how documentation of data sources (other than primary system) will be achieved (267/82-01-67) (see section 4.2.1.4).

PSC RESPONSE

The alternate meteorological source, as previously discussed in response to item 267/82-01-66, is the ten (10) meter backup meteorological tower. The 10 meter tower is provided instrumentation to indicate wind speed, wind direction, dew point, temperature, and precipitation. This information is available via the plant computer, via a dial-up modem to the NOAA computer, via voice communications with NOAA staff, and by remote readout adjacent to the tower.

Table 7.3-1 of the FSV RERP will be udpated to summarize the forementioned access methods, and to refer readers to the RERP implementing procedures. In addition, a brief RERP implementing procedure describing back-up meteorological data access methods will be developed and implemented by February 1, 1983.

NRC IMPROVEMENT ITEM

Facilitate the input of the transport and diffusion data into the dose projection process for manual assessment methods (267/82-01-68) (see section 4.2.1.4).

PSC RESPONSE

PSC is unable to discern from review of section 4.2.1.4 of the Emergency Preparedness Appraisal Audit Report the nature of the auditor's comment. PSC, at the time of the audit, had already accomplished this task. Since that time, several procedural changes have been made to further enhance the ability to quickly utilize the available transport and diffusion data. In addition, the PSC computerized offsite dose calculation methodology (Demand Function 41) has been formally made available and documented by issue of RERP implementing procedure RERP-DOSE, "Offsite Dose Calculation Methodology." Additional training to appropriate plant personnel on these calculations has been provided and documented.

We consider this item closed.

NRC IMPROVEMENT ITEM

Formalize the meteorological measurements preventative and corrective maintenance program and data qualification program to provide reasonable assurance that meteorological data will be available for use during a radiological emergency (267/82-01-69) (see section 4.2.1.4).

PSC RESPONSE

PSC, as part of its meteorological upgrades, has retained the services of a local service supplier to provide corrective maintenance on an as-needed basis, and preventative overall tower checkout every six months. In addition, PSC Operations and Results personnel will be providing the routine equipment care and maintenance in accordance with operational needs and manufacturer's recommendations.

We consider this item closed.

NRC IMPROVEMENT ITEM

Formalize the procedure to inform the control room staff of impending severe weather conditions that may impact the site area (267/82-01-70) (see section 4.2.1.4).

PSC RESPONSE

PSC, in order to fulfill requirements for an Early Warning Alert (EWA) system, opted to utilize a tone alert radio system. This radio has been provided to all residences within the five (5) mile plume exposure Emergency Planning Zone (EPZ). This radio is also maintained in the "Alert" position in the Control Room and the administrative office area.

The tone alert radio is triggered, in the event of an emergency, by the National Weather Service at the request of the State of Colorado. The warning tone will turn the radio on when set in the "Alert" position, and provide broadcast of an informative message. This message is provided over the same channels that provide tone alert for serious weather warnings in the area. Hence, by monitoring of the Weather Alert radio in the Control Room, plant operating staff will receive rapid, early warning of impending severe weather systems.

PSC considers this item closed.

NRC IMPROVEMENT ITEM

Develop a method for referencing the section in the EPIP's that pertains to the EOP's being used and ensure that the method is workable through RO training and drills (267/82-01-75) (see section 5.1).

PSC RESPONSE

This item has already been responded to and completed as a result of PSC response to the NRC Confirmatory Action Letter of January 26, 1982. PSC responded by providing a complete revision to FSV Emergency Procedures (EPs) that contains all information necessary to classify any set of plant "symptoms" bringing the operator into the EPs. In addition, PSC provided an overview procedure to cross-reference the EP symptoms to the various Emergency Action Level (EAL) Tables in the RERP (see EP-CLASS). FSV Training Department personnel report that these changes have been well received, and are very workable.

We consider this item closed.

NRC IMPROVEMENT ITEM

Retitle the RERP's (Station, Plant, and State) so as to clarify which document is being referenced (267/82-01-76) (see section 5.1).

PSC RESPONSE

This item has already been responded to by PSC. The implementing procedures have been retitled "Station RERP Implementing Procedures," with the words "Implementing Procedures" circled in red felt tip ink on the book's label on the binder spine. The State RERP was entitled by the State of Colorado, is on limited distribution, and offers little confusion in reaching for or finding FSV emergency response information.

We consider this item closed.

NRC IMPROVEMENT ITEM

Revise the current procedure process to clarify or remove the discrepancy between the APM and ADM (267/82-01-80) (see section 5.1).

PSC RESPONSE

Effective June 22, 1982, all of the old "ADM" procedures, with the exception of ADM-27 were cancelled. ADM-27 is being held over

until some site specific construction work is completed regarding 2" and Under Seismic Hangers. ADM-27 does not affect any existing procedure concerning operations or emerency response. The "ADM vs. APM" procedure conflict no longer exists as of this writing. Section 10, Appendix D of the RERP has been revised to reflect the cancellation of the ADM's. This item is closed.

NRC IMPROVEMENT ITEM

Clarify the purpose of the FSV procedure classification system to remove the confusion of policy procedures having a higher classification than the RERP (267/82-01-81) (see section 5.1).

PSC RESPONSE

A rather lengthy discussion was held with the NRC Auditors on two occasions concerning the administrative classification of procedural documents at Fort St. Vrain. The auditors were obviously not satisfied with the licensee's explanation, hence this audit finding.

The purpose for classifying procedures at various levels is to define administrative approval of and responsibility for the myriad of procedures that govern all licensee personnel associated with Fort St. Vrain. A level I procedure is intended to set administrative policy for all three major licensee divisions associated with Fort St. Vrain. An administrative procedure, as defined by APM G-2, requires the signature of all three division managers to initiate or revise, which can be a time consuming process. It was recognized early in the writing of the RERP and the RERP implementing procedures that numerous revisions would be required and that the RERP and the RERP implementing procedures would be under the control and administration of the Manager of Nuclear Production. A decision was made at that point to classify the RERP and the RERP implementing procedures as administrative level classification III in order to reduce revision approval time and to provide positive control over the procedures. The administrative classification system does not diminish the importance of a procedure.

NRC IMPROVEMENT ITEM

Correct the EPIP's to ensure that all appropriate and applicable emergency actions are defined and properly referenced in the FSV EOP's and the EPIP's (267/82-01-83) (see section 5.3).

PSC RESPONSE

PSC had undertaken actions relating to this item as several commitments. The commitment to revise both the EPIPs and EOPs,

utilizing the auditors' terminology, was carried out as part of PSC response to the NRC confirmatory action letter of January 26, 1982. Further commitments presently exist to develop additional RERP implementing procedures on specific RERP action tasks in response to Appendix A of the audit report, and to the 1982 Emergency Exercise Audit Report of August 11, 1982 (Inspection Report No. 50-267/82-14) as well as in response to items contained herein. These procedures will be developed in a manner similar to those presently in use.

The PSC response to this item is covered by previous responses and commitments in the forementioned responses. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct the EPIP's to include reference to all supporting procedures necessary to perform the required tasks (267/82-01-84) (see section 5.3).

PSC RESPONSE

PSC's revision and re-issue of the RERP implementing procedures specifically addressed this finding. References to supporting procedures are summarized in Section 5.0 of each RERP implementing procedure. Additionally, where appropriate, the referenced or supporting procedure is directly cited inside the text of the procedure (section 2.0).

This approach is a fundamental part of the RERP implementing procedures, and will continue as such in future revisions or issues of these procedures. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct all appropriate procedures to ensure that all of the necessary information is available to enable all outside notification calls to be made (including special code numbers, prefix numbers, and telephone numbers), and ensure that this information is kept up to date on at least a quarterly basis (267/82-01-85) (see section 5.4.1).

PSC RESPONSE

This task has already been completed. The second page of the RERP Phone List contains detailed dialing instructions. The timeliness of the Phone List contents is evaluated quarterly by performance of surveillance SR-TE-2Q, which requires document update for any errors or changes noted.

We consider this item closed.

NRC IMPROVEMENT ITEM

Revise the EPIP's to improve the timeliness of offsite notifications (267/82-01-87) (see section 5.4.2).

PSC RESPONSE

PSC in Issue 2 of the FSV RERP has commited to providing offsite notifications within the time frames specified in NUREG-0654, Revision 1. The revised plant Emergency Procedures, as well as the RERP implementing procedures reflect this fact. The PSC notification to offsite authorities is made in two parts. The initial notification is brief and provides whatever information is available early-on in an emergency. Supplemental detailed information is provided by a follow-up message to deliver more detailed data as it is made available.

We feel that our approach to offsite notifications is adequate and entirely consistent with the intent of NUREG-0654, Revision 1. We consider this item closed.

NRC IMPROVEMENT ITEM

Revise the guidance for protective actions to include plant system parameters and offsite monitoring in the decision basis (267/82-01-88) (see section 5.4.2).

PSC RESPONSE

RERP implementing procedure RERP-PAG, "Protective Action Guideline Recommendations" summarizes the PSC philosophy regarding the recommendation of offsite protective actions to State authorities. RERP-PAG states that in recommending protective actions, "the decision should be based upon dose projections, expected duration of release, weather conditions, and most importantly dose avoidance." Further, this procedure states that "for a protective action to provide any benefit, a substantial dose avoidance must be realized. The PAG values in no way imply an acceptable dose; they are simply values of dose avoidance where the benefit of taking a protective action is highly likely to exceed the risks associated with taking that action." The PSC philosophy on Protective Actions is consistent with that expressed by the EPA in publication of the Protective Action Guides.

PSC will utilize all information available when recommending offsite protective actions. Data regarding plant conditions and empirically determined radiation dose rates will be utilized whenever possible. We feel that adding several system parameter

values to the procedure would add unwarranted rigidity, and in fact diminish effectiveness of RERP-PAG in aiding to the decision making process, and could reduce the effectiveness and timeliness of the protective action recommendations.

We consider this item closed.

NRC IMPROVEMENT ITEM

Provide for use of isotopic release data in dose assessment procedures (267/82-01-89) (see section 5.4.2).

PSC RESPONSE

Current offsite dose calculation procedures utilize isotopic release data which is relevant to HTGR source terms. Furthermore, PSC has developed a straight forward means of utilizing this isotopic release data in a time dependent manner. PSC plans to incorporate this into the computer assisted calculations, as a minimum. PSC will also investigate the incorporation of this methodology into the manual offsite dose calculations and will incorporate time dependent release data into these calculations as well, provided that it can be demonstrated not to impair the ease and speed of manual calculation. Refinements to the offsite dose calculation methodology are continuously being pursued.

Estimated completion of this task, March 31, 1982.

NRC IMPROVEMENT ITEM

Correct all procedures intended for use under emergency conditions to include specific guidance in additional health physics aspects needed to maintain personnel exposures ALARA (267/82-01-95) (see section 5.4.2.3).

PSC RESPONSE

RERP implementing procedures, as they are developed, include the guidance noted above. Subsequent RERP implementing procedures developed will also incorporate this guidance, where appropriate.

NRC IMPROVEMENT ITEM

Develop and implement procedures for health physics and radiochemistry which are cumpatible and define responsible functions for postaccident sample analysis (267/82-01-96) (see section 5.4.2.4).

PSC RESPONSE

This will be accomplished through the revision of the Health Physics Procedures, as the radiochemistry procedures already define responsible functions and actions under postaccident (abnormal) conditions. The rewrite of procedures will be accomplished by December 31, 1982.

NRC IMPROVEMENT ITEM

Develop and implement emergency exposure work sheets that provide for signature concurrence on all personnel exposures that may exceed 10 CFR 20 exposure limits (267/82-01-100) (see section 5.4.3.1).

PSC RESPONSE

PSC has such a system intact in the Emergency Exposure Guidelines procedure, RERP-EXP. This procedure became effective August 2, 1982. We consider this item closed.

NRC IMPROVEMENT ITEM

Develop stay-time determination calculations (whole-body and extremity), including a method of enforcement and acknowledgment (267/82-01-101) (see section 5.4.3.1).

PSC RESPONSE

This item was incorporated into the recent release of RERP implementing procedure RERP-SURVEY, "Inplant/Onsite Radiological Monitoring." PSC will include these aspects in development of implementing procedures to address search and rescue functions (see response to item 82-01-111) and Emergency Repair and Corrective Action Teams (see response to item 82-01-118). Any procedures that address emergency team functions will be developed in accordance with this principle. As these procedures are addressed by other commitments, we consider this item closed.

NRC IMPROVEMENT ITEM

Correct the EPIP's to include the criteria used to determine the need to initiate the evacuation of owner-controlled areas (267/82-01-102) (see section 5.4.3.2).

PSC RESPONSE

PSC has agreed in P-82375 to provide an additional RERP implementing procedure to provide for personnel accountability of residents in the owner-controlled area (see item 82-14-01). In

this procedure, residents will receive automatic notification for an Alert or higher emergency classification. If PSC recommends evacuation to offsite authorities, we will take the same steps for residents on plant property. This will be reflected in the PCC and TSC implementing procedures.

NRC IMPROVEMENT ITEM

Develop and implement procedures to ensure positive control of all persons in the owner-controlled areas during evacuation (267/82-01-103) (see section 5.4.3.2).

PSC RESPONSE

This item was answered in the licensee's responses to the NRC Region IV open audit findings from FOSAVEX 82 G-82249). As was stated in the licensee's response, the new security computer installation will provide more positive control for accountability purposes in the owner-controlled area. This installation will not be complete until March, 1983. We suggest closing the item out as the commitment is currently being carried on the I & E Inspection list as an open item which will be closed out through the NRC Commitment Log System when the item is complete.

NRC IMPROVEMENT ITEM

Develop and implement procedures to ensure evacuation of all non-essential personnel from owner-controlled areas, including the visitor's center and to verify, within 30 minutes of the initiation of the evacuation, that all nonessential persons have been removed from the owner-controlled areas (267/82-01-104) (see section 5.4.3.2).

PSC RESPONSE

Evacuation of visitors from the Visitor's Center is an automatic action specified in the Visitor's Center Procedure of the RERP implementing procedures. PSC, in response to FOSAVEX 82 Inspection Findings, has previously commited to verify notification and/or evacuation of residents on owner-controlled areas by developing and implementing a specific RERP implementing procedure to verify accountability of residents on plant property (P-82375). PSC will revise the Visitor's Center procedure to require notification of the Shift Supervisor regarding status of visitor evacuation by December 31, 1982.

NRC IMPROVEMENT ITEM

Provide clear and conspicuous markings for primary and secondary evacuation routes both within the plant and outside the plant (267/82-01-105) (see section 5.4.3.2).

PSC RESPONSE

It is PSC's position that, with regards to inplant assembly/reassembly areas route markings are neither required nor necessary. The specified areas are all areas which plant personnel would be familiar with and are very limited in number. With regards to posting evacuation routes outside of the plant, PSC has absolutely no authority to perform this task and, again, any requirement or need to do this posting is not demonstratable. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to specifically identify the location of all assembly/reassembly areas (267/82-01-106) (see section 5.4.3.2).

PSC RESPONSE

PSC has already commited to review of the personnel accountability procedures (see P-82328, response to item 267/82-01-49) and the designation of two provisional reassembly areas, if habitability of a designated assembly area is a problem during initial accountability (see P-82328, response to item 267/82-01-50). All assembly areas are presently noted in procedure G-5 of the Administrative Procedure Manual, (APM) and APM procedure G-5 is referenced in both the RERP and RERP implementing procedures. We feel that this item is sufficiently addressed by our previously noted responses to Appendix A findings.

NRC IMPROVEMENT ITEM

Develop and implement a specific single procedure to govern all aspects of initial personnel accountability for all persons in the owner-controlled area (267/82-01-108) (see section 5.4.3.3).

PSC RESPONSE

PSC has addressed this item in Appendix A finding 267/82-01-49 (see P-82328). We consider this item closed.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to properly reference the personnel accountability procedure (267/82-01-109) (see section 5.4.3.3).

PSC RESPONSE

This was accomplished as a result of revision to both the RERP and the RERP implementing procedures. We consider this item closed.

NRC IMPROVEMENT ITEM

Develop and implement specific procedures to govern the establishment and operation of a search and rescue team (267/82-01-111) (see section 5.4.3.3).

PSC RESPONSE

This will be accomplished by issue of a new RERP implementing procedure to describe Search and Rescue Operations, and to describe means of maintaining personnel exposure as low as reasonably achievable. This will be completed by March 1, 1983.

NRC IMPROVEMENT ITEM

Develop and implement specific procedures to govern the actions necessary to ensure continued personnel accountability after the initial personnel accountability is completed (267/82-01-112) (see section 5.4.3.3).

PSC RESPONSE

This is presently handled by the Personnel Exposure and Accountability Controller at the PCC, and is described in implementing procedure RERP-PCC. We consider this item closed.

NRC IMPROVEMENT ITEM

Specifically identify in the RERP and EPIP's the persons, by name and title, who are individually responsible to take personnel accountability at each emergency station (267/82-01-113) (see section 5.4.3.3).

PSC RESPONSE

PSC in APM procedure G-5 has specifically identified individuals responsible to evaluate departmental accountability at the emergency stations. We have demonstrated in several drill situations that this system works. The current situation must be looked upon as an interim method of evaluating personnel

accountability prior to installation of the new security computer system in early 1983, as discussed in P-82375, item 82-14-01(2). We consider this item closed due to the referenced commitment.

NRC IMPROVEMENT ITEM

Provide instructions that ensure each person who is monitored for contamination at an assembly area, reassembly area, or exit point during an emergency event is logged by name; and data is entered on contamination levels found, minimum detectable activity of instrumentation, and results of any decontamination (267/82-01-114) (see section 5.4.3.4).

PSC RESPONSE

Appropriate guidance for and documentation of decontamination operations will be put into the RERP implementing procedures. This will be accomplished by December 31, 1982.

NRC IMPROVEMENT ITEM

Correct the EPIP's to properly reference the appropriate security procedures to be implemented during radiological emergencies (267/82-01-115) (see section 5.4.4).

PSC RESPONSE

As was noted by the Auditors, the appropriate security procedures do exist and are part of the Fort St. Vrain Amended Security Plan. The licensee has had discussions with the NRC DOS staff concerning reference to security procedures in the RERP implementing procedures and neither DOS or the Licensee is willing to reference security procedures other than Section 6.10. The "Personnel Accountability for Station Emergencies" procedure, Section 6.10, will be referenced in the RERP implementing procedures by December 31, 1983.

NRC IMPROVEMENT ITEM

Provide permanent radiological monitoring equipment to determine habitability of CAS and SAS during radiological emergencies (267/82-01-117) (see section 5.4.4).

PSC RESPONSE

Appropriate instrumentation will be provided in CAS and SAS. This action will be implemented by July 1, 1983.

NRC IMPROVEMENT ITEM

Develop and implement specific procedures which govern the formation, direction, and control of emergency repair and corrective action teams during an emergency (267/82-01-118) (see section 5.4.5).

PSC RESPONSE

This will be performed as an additional procedure for the RERP implementing procedures. This will be completed by March 1, 1983.

NRC IMPROVEMENT ITEMS

Develop and implement specific and detailed procedures to govern the functional operations of the recovery organization (267/82-01-119) (see section 5.4.6).

Expand both the depth and scope of the recovery operations planning in the RERP (267/82-01-120) (see section 5.4.6).

Develop and implement methods to inform members of the various response organizations of the initiation of the recovery organization or of any other changes in the licensee response organizational structure or functions (267/82-01-124) (see section 5.4.6).

PSC RESPONSE

Items 119, 120, and 124 basically cover the recovery phase organization, procedures, reentry, and outside agency response. These items should be addressed together, as the philosophy behind a recovery phase scenario at Fort St. Vrain is somewhat different than would be the case at an LWR plant. The intent of Section 9 of the RERP is to achieve normal staffing levels as soon as possible after a radiological emergency in order to commence recovery activities with the best licensee expertise returned to the site. In Fort St. Vrain's worst case accidents, the PCRV must be depressurized and containment isolation of the PCRV attained. Once these objectives have been met and the plume has dispersed, the immediate concerns for the safety and health of the public have been fulfilled. The intent of Section 9 is then to utilize the normal Fort St. Vrain management and performance level staff to commence the recovery phase. Management decisions, responsibilities, and authorities are intended to function in the normal chain including decisions regarding reentry, functional recovery operations, and requirements for additional outside expertise. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct the RERP and EPIP's to reflect that the authority and responsibility for activation of the recovery organization rests with the licensee's Corporate Emergency Director who is the Emergency Coordinator when such a decision would be made (267/82-01-121) (see section 5.4.6).

PSC RESPONSE

This has been clearly stated in the RERP and the RERP implementing procedures (refer to RERP section 9.0; and RERP implementing procedures RERP-FCP, section 3.1.3; RERP-ORG, section 2.2.1). This items is closed.

NRC IMPROVEMENT ITEM

Develop and implement specific criteria to be used to determine when after an accident, reentry of the facility would be appropriate or when operation of the plant could resume (267/82-01-122) (see section 5.4.6).

PSC RESPONSE

Recovery guidance and criteria are currently contained in the FCP and TSC RERP implementing procedures. It should be recognized that reentry would be evaluated on a case by case basis, dependent upon plant conditions and need for reentry, and as such, specific criteria are not appropriate. Operation of the plant, as always, would be in accordance with the plant Technical Specifications. We consider this item closed.

NRC IMPROVEMENT ITEM

Develop and implement procedures, during recovery operations, to periodically estimate total population exposure and integrated dose (267/82-01-123) (see section 5.4.6).

PSC RESPONSE

Although we consider this to be the responsibility of the State of Colorado as defined in the State RERP, we possess the capability to perform these functions based on the results of our Environmental Radiological Surveillance Program, our automated meteorological summaries program, and our offsite dose calculation methodology as contained in the RERP implementing procedures. We consider this item closed.

NRC IMPROVEMENT ITEM

Add NRC Public Affairs representatives to the list of authorized representatives listed in Section SEOC, 2.0 Implementation, paragraph 2.1.2 of the FSV RERP (267/82-01-125) (see section 5.4.7).

PSC RESPONSE

The Public Affairs Representative will be discussed with the DODES staff and added to the authorized list prior to June, 1983.

NRC IMPROVEMENT ITEM

Develop and implement procedures that will ensure all radiation, contamination control, and area monitors are periodically checked to verify response to a predetermined value of a known source strength and include what corrective actions are to be taken when discrepancies are encountered (267/82-01-126) (see section 5.5.1).

PSC RESPONSE

All area monitors are currently checked via a surveillance requirement. Appropriate procedures and guidance with respect to radiation and contamination control instrumentation will be incorporated into the Health Phsyics Procedures by December 31, 1982.

NRC IMPROVEMENT ITEM

Provide procedures which ensure operational response with check sources of the radiological survey equipment during quarterly inventories and prior to emergency use (267/82-01-127) (see section 5.5.1).

PSC RESPONSE

Appropriate procedures will be developed and implemented by December 31, 1982. Emergency survey equipment is currently being response checked on a weekly basis.

NRC IMPROVEMENT ITEM

Develop and implement a formal procedure that describes, in detail, the drills and exercise program (267/82-01-128) (see section 5.5.2).

PSC RESPONSE

This will be reflected in the TPAM revision to the Situation Response Training section to be completed by May, 1983.

NRC IMPROVEMENT ITEM

Develop and implement a procedure to ensure a thorough annual review and documentation of the review of the RERP and EPIP's (267/82-01-129) (see section 5.5.3).

PSC RESPONSE

The Emergency Response Plan, as described by NUREG-0654 and implemented through the Fort St. Vrain Radiological Emergency Response Plan (FSV RERP), is evaluated on an annual basis against the established criteria. The Quality Assurance (QA) Department is committed to auditing all applicable elements of the QA Program, of which the FSV RERP is a part, at least once every two years, as defined in FSAR UPDATE Appendix B, Section B.5.19.12. The Nuclear Facility Safety Committee (NFSC) also is committed to a biennial review of the facility Emergency Plan and implementing procedures as defined in Fort St. Vrain Technical Specification AC 7.1.3, Section 7.b(5). Both of these auditing commitments are included in the audit schedule and are scheduled on alternating years, thus ensuring an annual review of the Emergency Preparedness Program. A large portion of each audit conducted on this topic is used to monitor the annual emergency exercise which requires plant personnel, as well as local and state representative participation. Deficiencies noted in the audits are documented on Corrective Action Action Requests (CA-ARs) and are not closed-out until the acceptable corrections have been made and incorporated into the Emergency Preparedness Program.

The in-house evaluations of the Emergency Preparedness Program are re-evaluated prior to each successive emergency drill to inform the auditors of past weaknesses in the exercise. This awareness of previous deficient areas insures a concerted effort of monitoring possible inadequate areas.

NRC IMPROVEMENT ITEM

Remove the reference to the corporate emergency planning personnel (267/82-01-130) (see section 5.5.3).

PSC RESPONSE

This reference will be removed and corrected to reflect current conditions in the October 1, 1982 revision and re-issue of the RERP.

NRC IMPROVEMENT ITEM

Develop and implement a procedure for the routine audit of the RERP and EPIP's (267/82-01-131) (see section 5.5.4).

PSC RESPONSE

Refer to response for 267/82-01-129.

NRC IMPROVEMENT ITEM

Evaluate the usability of existing documents and instruments, which would be used during an emergency, for human factors engineering corrections (267/82-01-132) (see section 5.6).

PSC RESPONSE

PSC has been considering this factor in all revisions to the RERP, RERP implementing procedures, and Emergency Procedures. These considerations have lead to greater tabbing in the EPs and RERP implementing procedures, a new worksheet control system for RERP implementing procedures, reformatting of RERP implementing procedures, symptom-action matrix format for EPs, etc. We consider this item closed.

NRC IMPROVEMENT ITEM

Correct EPIP's to provide that a single individual be responsible for actions on any single page of the procedure (267/82-01-133) (see section 5.6).

PSC RESPONSE

PSC does not agree that a single individual should be responsible for the actions on any single page of the procedure but we do agree that some of the worksheets and checklists required too many different persons to perform actions or steps contained on the same page. These worksheets and/or checklists have been revised to restrict the number of individuals performing steps on a given worksheet or checklist to one. In addition, multiple copies of all worksheets, datasheets, and checklists have been added to each RERP implementing procedure as appropriate, to ensure that adequate copies are available. This item is closed.

NRC IMPROVEMENT ITEM

Provide actual telephone numbers and instruction for calling offsite assistance (267/82-01-135) (see section 6.1).

PSC RESPONSE

Due to the need for the Phone Lists to be useful from various locations which may have different dial-out procedures, PSC has instead opted to indicate dialing exchanges required to reach the outside assistance numbers, and refers the user to dialing instructions in the Phone Lists. This item is closed.

NRC IMPROVEMENT ITEM

Develop a transient public information program as soon as possible now that the decision to install an early warning system has been made (267/81-01-136) (see section 6.2).

PSC RESPONSE

PSC currently updates the public within the 5 mile EPZ on an annual basis. The intent is to allow local landlords to inform their transient population as may be required. There really isn't a very good method for informing an individual who is merely driving by the site. PSC is of the opinion that the current public information dispersal program provides reasonable assurance that the information is disseminated. We consider this item closed.

NRC IMPROVEMENT ITEM

Review the current arrangements for public inquiry, staffing requirements, telephone capabilities, and consider training requirements for PIC personnel (267/82-01-137) (see section 6.2).

PSC RESPONSE

Public inquiry, staffing requirements at state facilities and training requirements for state office staff are the responsibility of the various state offices as is set forth in the State Emergency Plan. The matter of telephones for media use at the State EOC was also an open item in the NRC's findings from FOSAVEX 82. As was stated in PSC's response to the open item (see P-82375), the licensee will discuss the matter with DODES but cannot assure that more telephone service will be made available.