U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-10/83-01(DRMSP); 50-237/83-01(DRMSP); 50-249/83-01(DRMSP)

Docket Nos. 50-10; 50-237; 50-249 Licenses No. DPR-2; DPR-19; DPR-25

licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Dresden Nuclear Generating Station, Units 1, 2, and 3

Inspection At: Dresden Site, Morris, IL
Corporate Office, Chicago, IL

Inspection Conducted: January 3-7, 1983

Inspectors: M. P. Phillips, Team Leader 2/2/83

T. J. Ploski 2/3/83

W. C. Snell 2/3/83

W. B. Gloersen 2/3/83

Approved By: W. L. Axelson, Chief 2/3/83
Emergency Preparedness Section

C. J. Paperiello, Chief 2/3/83
Emergency Preparedness and
Radiological Protection Branch

Inspection Summary

Inspection on January 3-7, 1983 (Reports No. 50-10/83-01(DRMSP); 50-237/83-01(DRMSP); 50-249/83-01(DRMSP))
Areas Inspected: Routine announced inspection of the following areas of the emergency preparedness program: licensee actions on previously identified items; activation of the Generating Stations Emergency Plan (GSEP); emergency detection and classification; protective action decisionmaking; notifications and communications; changes to the emergency preparedness program; shift staffing and augmentation; knowledge and performance of duties (training); public information program; and licensee audits. The inspection involved 225 inspector-hours onsite by four NRC inspectors and two consultants.

Results: No items of noncompliance or deviations were identified; however, of the ten areas inspected, deficiencies were identified in the following three areas: public information; emergency detection and classification; and activation of the GSEP.

DETAILS

1. Persons Contacted

*D. Scott, Station Superintendent
*R. Flesner, Supervisor, Radicecology and Emergency Planning (CECo)
*R. Ragan, Assistant Superintendent, Operations
*D. Farrar, Assistant Superintendent, Admin. and Support Services
*T. Blackman, Procedures Manager
*D. Reece, GSEP Coordinator
*E. Williams, Quality Assurance Engineer (CECo)
R. Stobert, Quality Assurance Engineer (CECo)
R. Christiansen, Shift Engineer
R. Facchina, Shift Engineer
R. Goodin, Shift Engineer
D. Strobel, Shift Engineer
V. Rockovski, Shift Engineer
J. Gates, Shift Control Room Engineer
W. Pietryga, Shift Control Room Engineer
G. Smith, Shift Control Room Engineer
B. Zank, Training Supervisor
S. Young, Training Instructor
P. Cook, Technical Training Administrator (CECo)
J. Schrage, Training Instructor
L. Wolk, Training Instructor
B. Wellman, Chemist
A. Mozel, GSEP Training Administrator (CECo)
D. Cooper, GSEP Group Leader (CECo)
J. Golden, Supervisor, Health Physics and Emergency Planning (CECo)
W. Brenner, Lead Emergency Planner (CECo)
J. Barr, Assistant Lead Emergency Planner (CECo)
F. Morris, Senior Participant, Offsite Reviews, Office of Nuclear Safety (CECo)
J. Fancher, Senior Staff Engineer, Quality Assurance (CECo)
A. Saller, Training Coordinator, Quality Assurance (CECo)
J. Toscas, Public Affairs Staff (CECo)

*Denotes those attending the exit interview on January 7, 1983.

2. Licensee Action on Previously Identified Items

a. Confirmation of Action Letter (CAL)

(Closed) CAL Items 010/81-16-01; 237/81-27-01; 249/81-20-01: Incorporate revised protective action recommendations table in GSEP and procedures. Revision 3 of the GSEP and Table 1 of the Dresden Emergency Plan Implementing Procedure (EPIP) 300-1 were both issued and include the revised protective action recommendations table. All Station Directors and Acting Station Directors have been trained in its use. This item is considered closed.

(Closed) CAL Items 010/81-16-02; 237/81-27-02; 249/81-20-02: Prioritize the notification phone list. EPIP 300-1, Initial

Notifications and GSEP Responses, specifies that the activation of the GSEP Station Group and augmentation of personnel will be implemented using the EPIP Notifications Phone List. This phone list, which is updated quarterly, outlines the station augmentation scheme, identifies individuals capable of serving in the emergency positions described in Table B-1 of NUREG-0654, Revision 1, specifies the content of the initial message to be given to those contacted, and priorities are developed to facilitate achieving acceptable staff augmentation within 30 minutes (e.g., includes the driving time for those personnel needed within 30 minutes). This item is considered closed.

(Closed) CAL Items 010/81-16-03; 237/81-27-03; 249/81-20-03: The Corporate Command Center (CCC) Director's call list must have priorities developed such that a Recovery Manager will be at the nearsite EOF within 60 minutes of determining that the EOF must be activated. On January 27, 1982, a memo from Mr. F. Palmer was sent to all qualified CCC Directors and Recovery Managers and included a Recovery Manager matrix for notification based on the plant where the incident occurred. The goal of the memo and enclosed matrix is to have a Recovery Manager at the nearsite EOF within one hour of notification of a Site Area or General Emergency. The matrix includes at least three names per plant for business hours and four to five names for non-business hours. This item is considered closed.

(Closed) CAL Items 010/81-16-04; 237/81-27-04; 249/81-20-04: Dresden EPIP 500-7 will be revised to ensure that required communications checks with the NRC are conducted. Section F.2.b of EPIP 500-7 (Revision 5) states that the ENS phones shall be tested monthly. It further states that these checks will be documented on the Emergency Notifications System Checklist. This checklist includes all of the communications checks specified in 10 CFR Part 50, Appendix E, Section IV.E.9.d. This item is considered closed.

(Closed) CAL Items 010/81-16-05; 237/81-27-05; 249/81-20-05: Submit a description of the prompt public notification system to the NRC. By letters dated December 14, 1981, January 15, and February 16, 1982, from Mr. L. O. DelGeorge to Mr. J. G. Keppler, the licensee submitted a description of the prompt public notification system installed at the Dresden facility. This item is considered closed.

b. Significant Test Deficiency (Prompt Public Notification System)

(Closed) Significant Deficiency Items 010/82-11-01; 237/82-15-01, 249/82-16-01: Failure of seven sirens to satisfactorily operate during the June 24, 1982, test of the Emergency Planning Zone (EPZ) prompt notification system sirens. Those sirens that did not satisfactorily activate were retested as follows: Will County on November 2, 1982; Grundy County on November 4, 1982; and Kendall County on November 10, 1982. All of these retests were performed acceptably. In addition, siren tests are routinely conducted on the first Tuesday of each month. The licensee is not aware of any recent siren test deficiencies. This item is considered closed.

c. Preparedness Improvement Items

The inspectors reviewed licensee actions to address preparedness improvement Items 3, 4, 5, 6, 7, 8, 9, 10, 11, and 12 listed in Appendix B of our December 14, 1981, letter. The licensee's actions are acceptable and these items are considered closed.

d. Open Items

(Closed) 010/81-16-10; 237/81-27-11; 249/81-20-11: Installation of all equipment, supplies, and the Safety Parameter Display System (SPDS) must be installed in the permanent TSC. The completion of the TSC, including all required assessment parameters, will be specified in a confirmatory order to be issued after review of the licensee's response to Supplement 1 of NUREG-0737. A post implementation appraisal will then be conducted. For the purposes of tracking, this item is considered closed.

(Closed) 010/81-16-11; 237/81-27-12; 249/81-20-12: Relocation of the Operational Support Center (OSC). The OSC has been relocated to the Radiation Protection Foreman's Office. This relocation is specified in Revision 2 of the Dresden Annex and all of the appropriate station EPIPs. This item is considered closed.

(Open) 237/81-27-13; 249/81-20-13: Installation, testing, and development of procedures covering sampling and analysis using the Sentry high radiation sampling system must be completed. This item will be reviewed during the observation of the 1983 annual exercise.

(Open) 237/81-27-14; 249/81-20-14: Installation, testing, and development of procedures covering sampling and analysis using the SPING and Victoreen post-accident stack effluent systems must be completed. Although the SPING system has been installed, the Victoreen system will not be completed until July 1983. This item will be reviewed after both systems have been completed.

(Closed) 237/81-27-15; 249/81-20-15: Installation and calibration of the high range containment radiation monitor is required. These monitors have been installed and appropriate Emergency Action Levels (EALs) have been developed based on their readings. This item is further discussed in NRC Inspection Report 50-237/82-30; 50-249/82-31. This item is considered closed.

(Closed) 237/81-27-16; 249/81-20-16: Revision 9 to DAP 7-1 must be issued and Shift Control Room Engineers (SCREs) must be trained in their new responsibilities. Both Revisions 9 and 10 to this procedure have been issued, and specify, among other things, that the SCRE has the following primary responsibilities during normal operations: (1) he keeps the Shift Engineer informed of any abnormal operating conditions, reporting requirements, and disciplinary problems; and (2) he notifies the Shift Engineer of any condition that potentially could require notifications and activations of the GSEP. The inspectors conducted walkthroughs of all SCREs available during the inspection to determine that they

were aware of these assigned responsibilities. These walkthroughs confirmed that they were aware of these responsibilities. The inspectors concluded that this is an acceptable compensating action to ensure that upon implementation of any Abnormal Occurrence Procedure or Emergency Operating Procedure, the Shift Engineer is informed of any event which could potentially involve classification in the GSEP. This item is considered closed.

(Closed) 010/81-16-12; 237/81-27-17; 249/81-20-17: Revision 2 to EPIP 300-3 must be issued. The licensee issued this procedure revision on April 20, 1982. This revision was issued with no changes made from the draft reviewed during the emergency preparedness implementation appraisal. This procedure addresses the assembly and evacuation of onsite personnel. This item is considered closed.

e. TMI Action Items

(Closed) Task Item III.A.1.2, Tracking Item 1.b: OSC. The licensee has established an OSC in the Radiation Protection Foreman's office. A backup OSC is also described. This backup facility is located in the Unit 1 Battery Room. Both of these facilities are capable of serving as assembly points for support personnel. This facility is capable of reliable voice communications with the control room, Technical Support Center (TSC), and nearsite Emergency Operations Facility (EOF) utilizing existing phone lines. In addition, a dedicated phone between the control room and OSC is available. This phone is available in both the primary and backup OSC. The Shift Foreman of the unaffected unit is responsible for coordinating and assigning the personnel to tasks designated by the Station Group. This item is considered closed.

(Open) Task Item III.A.2, Tracking Items 4 and 5: Upgraded emergency response. Supplement 1 to NUREG-0737 was provided as further guidance on emergency preparedness by a letter from D. Eisenhut to all licensees on December 17, 1982. Further review of this item will be conducted after the confirmatory order addressed in the December 17, 1982, letter is issued.

3. Activation of the GSEP

(Closed) 237/81-XX-01; 237/81-XX-02; 249/81-XX-01; 249/81-XX-02; 249/82-XX-02; 249/82-XX-03; 249/82-XX-04: Activation of the GSEP at Dresden Station. During the period January 1, 1982, through December 31, 1982, the licensee activated their GSEP on seven occasions. The exact date and time of these classifications, time of notifications, and emergency classification are shown in Table 1 below. In addition, an Unusual Event was declared on December 23, 1981, due to inoperability of ECCS components such that Technical Specifications required shutdown. The inspectors reviewed the emergency action levels that were used to classify each of these events and determined that all classifications were appropriately made on all occasions. For the Alert which was declared on December 3, 1982, the Station Director, Rad/Chem Director, and Maintenance Director were at the TSC within one hour of the

emergency declaration, although the TSC was not officially declared manned until 1½ hours after emergency declaration. Further discussion of the actions taken by the licensee during the December 3, 1982, emergency are discussed in NRC Reports No. 50-10/82-17; No. 50-237/82-24; and No. 50-249/82-24.

TABLE 1

GSEP ACTIVATIONS AT DRESDEN DURING 1982

Date	Time of Emergency Declaration[1]	EAL No.	Time SPLD Notified[2]	Time State ESDA Notified[3]	Emerg. Class	Elapsed Time (hr:min)
01/19/82	1935	12-18	2005	2103	U.E.	1:28
03/27/82	1300	2	1311	1341	U.E.	:41
04/16/82	0845[4]	1	0845	0855	U.E.	:10
10/28-82	0014	10	0017	0034	U.E.	:20
11/09/82	0518	4	0522	0545	U.E.	:27
11/09/82	1655	3	1723	1735	U.E.	:40
12/03/82	1940	15	2005	2024	Alert	:44

[1] Time of declaration is the first time listed in the Shift Engineers log which states "declared unusual event" or words to the effect that an emergency classification has been made. It is not the time when the event occurred.

[2] Time given on initial Nuclear Accident Reporting System (NARS) form filled out by Station personnel.

[3] Time given in letter from Mr. E. Jones, Emergency Services and Disaster Agency (ESDA) to Dr. C. Paperiello, NRC dated December 7, 1982.

[4] Decided to send contaminated patient to hospital at 0810; notified hospital at 0817; event occurred at 0745; waited until 0845 to classify event.

NOTE - elapsed time is from emergency declaration to ESDA notification.

As shown in the table, for six of the emergency declarations, the time to notify the state was in excess of fifteen minutes. For the one occasion when the time was within fifteen minutes, the time from when the emergency should have been declared until it actually was declared was 28 minutes. This data demonstrates that the licensee does not have the capability to notify responsible State and local authorities within fifteen minutes of an emergency declaration, even though the notification

scheme described in the GSEP was utilized. This notification scheme has the station call the System Power Load Dispatcher (SPLD), who then calls the Corporate Command Center (CCC) Director, who then calls the appropriate State and local governmental agencies.

10 CFR Part 50, Appendix E, Section IV.D.3, states that a licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency. Section IV.C of Appendix E states that the emergency classes defined shall include: (1) notification of unusual event; (2) alert; (3) site area emergency; and (4) general emergency. As stated in the regulations, the fifteen minute notification time applies to the declaration of an emergency, not to any specific emergency. That is, this time limit applies to all four emergency classes and not just a general emergency. Guidance provided in Appendix 1 of NUREG-0654, Revision 1 on page 1-3 states that prompt notification of offsite authorities is intended to indicate within about fifteen minutes for the unusual event class and sooner (consistent with the need for other emergency actions) for other classes. With regard to when the "fifteen minute clock" starts, the regulations state that it starts after declaration of an emergency. Therefore, the "fifteen minute clock" starts when the emergency has been classified.

10 CFR 50.47(b)(2) states that on-shift facility licensee responsibilities for emergency response are unambiguously 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. Criterion II.B.2 in NUREG-0654, Revision 1, provides guidance on the implementation of this requirement. This criterion states that each licensee shall designate an individual as emergency coordinator who shall be on shift at all times and who shall have the authority and responsibility to immediately and unilaterally initiate any emergency actions, including providing protective action recommendations to authorities responsible for implementing offsite emergency measures. According to the GSEP, the Shift Engineer is the Acting Station Director, and as such has the authority to classify an emergency. Once he has classified the event, the "fifteen minute clock" begins. These actions are expected to take place in the control room. Upon activation of the Technical Support Center (TSC), this responsibility shifts to the designated Station Director.

Based on the above findings, the following action must be taken to achieve an acceptable program:

- The licensee must revise the notification scheme such that the capability to notify responsible State and local governmental agencies within fifteen minutes after declaring an emergency will be achieved. (010/83-01-03; 237/83-01-03; 249/83-01-03)

4. Emergency Detection and Classification

The inspectors reviewed EPIP 200-T1, Classification of GSEP Conditions, and determined that appropriate Emergency Action Levels (EALs) were provided to implement Table DA 5-1 in the GSEP. These EALs include both inplant conditions as well as onsite and offsite radiological monitoring results. The emergency classifications described in both the licensee's GSEP and EPIPs are as follows: (a) Transportation Accident, (b) Unusual Event, (3) Alert, (4) Site Area Emergency, and (5) General Emergency. The inspectors reviewed EAL Nos. 4, 5, 9, 11, and 12, and determined that they are consistent with appropriate control room instrumentation. A procedure has been placed next to the SPING which is utilized in the determination of offsite noble gas releases. Although these EALs were initially agreed on with State and local agencies prior to initial implementation of the GSEP, they have not been reviewed by State and local agencies on an annual basis, as required by 10 CFR Part 50, Appendix E, Section IV.B. At the time of this inspection the licensee had not been aware of this requirement and therefore had never taken any action to implement it. The Shift Engineer, who is on shift 24 hours per day, is the initial Acting Station Director, and as such has the responsibility for classifying the event, making protective action recommendations, and notifying offsite agencies. As discussed in Paragraph 2.d above (Item 237/81-27-16; 249/81-20-16), the Emergency Operating and Abnormal Occurrence Procedures are not utilized to direct the user to classify emergencies nor do they incorporate EALs into the text. At Dresden, the SCRE is responsible for notifying the Shift Engineer of any condition that potentially could require notifications and activations of the GSEP. This alternate approach appears to be acceptable.

Based on the above findings, the following action must be taken to achieve an acceptable program:

. The licensee must develop a system to assure that Emergency Action Levels are reviewed with State and local agencies on an annual basis. (010/83-01-02; 237/83-01-02; 249/83-01-02)

5. Public Information Program

Emergency information pamphlets describing what to do in case of an emergency at the Dresden Nuclear Station have been developed. These pamphlets include emergency instructions, plans for emergencies, information about radiation, what to do if the prompt public notification system is activated, the points of contact to receive additional information, and special instructions for the handicapped. Content of the brochures is coordinated with offsite officials. The 1982 revision included additional information on the use of the prompt public notification system.

These pamphlets were mailed to the general permanent population in late November 1982. In addition, bulk deliveries were made to businesses, motels, and other such places where the transient adult population would be located. The inspectors reviewed the log of locations and dates for these bulk deliveries, and also determined that residents within the plume exposure pathway EPZ had received a copy in the mail. The previous

distribution of this public information pamphlet was conducted during April 1981, approximately twenty months earlier. According to the licensee, the substantial delay was due to priority structure and an impression of what the term annual distribution meant.

10 CFR Part 50, Appendix E, Section IV.D.2 states that provisions shall be provided for yearly dissemination to the public within the plume exposure pathway EPZ of basic emergency planning information. In addition, 10 CFR 50.47(b)(7) requires information to be made available to the public on a periodic basis. Section 8.4 of the generic GSEP states that CECo is committed to distribute informational brochures on an annual basis. As defined in Technical Specification surveillance requirements, an annual interval consists of twelve months, with a maximum allowable extension not to exceed 25% or three months; in addition a total maximum combined time interval for any three consecutive years must not exceed three years plus three months. IE Information Notice No. 82-44 referred to this in reference to the annual exercise when it stated that it was unlikely that the Commission would take enforcement action if the annual exercise is held within three months of the anniversary of the previous annual exercise. Similarly, annual distribution of the public information brochures must be held within three months of the anniversary of the previous distribution of these brochures. This was not done for the 1982 distribution.

Based on the above findings, the following action must be taken to achieve an acceptable program:

- The licensee must ensure that the 1983 distribution of the public information brochure is conducted such that the above frequency requirements are met. (010/83-01-01; 237/83-01-01; 249/83-01-01)

6. Protective Action Decisionmaking

The Shift Engineer, as the Acting Station Director, has complete authority over the initial operations of the Station Group, including initial protective action recommendations to offsite agencies. After activation of the Station Group or Recovery Group, this authority transfers to the Station Director or Recovery Manager respectively. These responsibilities are specified in the appropriate EPIP, CCC, and EOF procedures. The notification procedure (EPIP 300-1) contained a table of protective action recommendations based on emergency classifications, and the inspectors determined that this table was consistent with the table provided in the GSEP. Both of these tables base protective action recommendations on either an offsite dose assessment or degree of radioactive material in containment; however, they do not identify any protective action recommendations based on reactor or containment conditions that could lead to a release of radioactive material sufficient to warrant protective action measures. An example flow chart for protective action recommendations based on control room indicators (no dose projections required) is included as Attachment 1 to this report. This flow chart is based on the guidance provided on page 1-17 of Appendix 1 in NUREG-0654, Revision 1.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following matter should be considered for improvement:

- Incorporate the Attachment 1 flow chart into the GSEP and appropriate station EPIPs and train appropriate personnel in its use.

7. Shift Staffing and Augmentation

The minimum shift staff, which is outlined in Figure 4.2-2 in the generic GSEP, meets the criteria in Table B-1 of NUREG-0654, Revision 1. Shift augmentation is accomplished utilizing the Notification Phone List. This is further discussed in Paragraph 2.a above (CAL Item Nos. 010/81-16-02; 237/81-27-02; 249/81-20-02). Augmentation Drills were conducted on January 25, June 24, June 27, and September 22, 1982. As a result of these drills, the licensee added more individuals to the call list. The inspectors reviewed the results of these drills and determined that appropriate actions had been taken to ensure the augmentation goals of Table B-1 of NUREG-0654, Revision 1, would be met.

Based on the above findings this portion of the licensee's program is acceptable.

8. Notifications and Communications

The inspectors examined the communications equipment at the permanent OSC, TSC, EOF, and control room. In addition, the Notification Phone List, EPIP 100-C1, and EPIP 300-1, were reviewed. The notification procedures are described for each of the emergency classifications. In general, the Acting Station Director would make three notification phone calls in an emergency as follows: (1) the System Power Load Dispatcher (this call would eventually result in the notification of the State and local agencies); (2) the Operations Duty Supervisor (this call would result in staff augmentation on back shifts); and (3) the NRC. In the case of a General Emergency classification, he would also notify the appropriate State and local agencies directly. A discussion of the timeliness of this notification procedure as it relates to offsite agency notifications is discussed in Paragraph 3 above. The Notification Phone List contains a listing of all personnel trained and capable of performing the emergency functions outlined in the GSEP in the form of a notification call tree. The content of messages to be given to activate the emergency organization is also included. This List is updated quarterly to ensure its completeness. The content of initial messages given offsite, including messages to the SPLD, CCC Director, and appropriate State and local agencies is outlined in the Nuclear Accident Reporting System (NARS) form. When completed, the form provides all the necessary information outlined in Criterion II.E.3 of NUREG-0654, Revision 1, including provisions for message verification.

The prompt public notification system is described in Section 6.3 of the generic GSEP and Dresden Annex. Although the counties decide on a test frequency, the State Emergency Services and Disaster Agency has

requested that this test be conducted on the first Tuesday of each month. The licensee performs maintenance and repairs on the system when notified of any test deficiencies. The correction of past deficiencies is discussed in Paragraph 2.b above. The licensee is not aware of any test deficiencies as a result of tests conducted within the last two months. A siren with public address capability is being installed in Goose Lake State Park to provide additional assurance that transient park vistors will also be notified of actions to take if the sirens are sounded during an emergency.

All of the communications systems described in the GSEP are in place and operational at the various emergency response facilities. In addition, a blue microwave voice system has been installed to allow conference communications between various groups of response personnel in various centers (e.g., dose assessment personnel in the TSC, CCC, and EOF). Backup communications systems are available in case one system becomes inoperable. Backup power is provided for all dedicated communications systems at the EOF, TSC, OSC, and control room. A communications drill is conducted monthly to verify operability of all the dedicated communications systems described in Section 7.2 of the GSEP. The inspectors observed one of these drills during the inspection. During this drill, some difficulty was encountered with the range of the offsite monitoring team radios when the hand held radios were used with the standard portable antenna. This range could probably be enhanced if car mount antennae were utilized for offsite team communication.

The communications equipment has just recently been installed at the permanent EOF. This system requires the user to perform a specific procedure to activate most of the microwave phones, although several standard phone lines are always operational. This phone activation procedure has not yet been issued, and a limited number of station personnel are familiar with this procedure. In addition, while observing the licensee's drill, several problems were encountered in the activation of the Level I microwave system. The licensee stated that a formal activation procedure would be issued as soon as all the permanent EOFs were completed at all their sites. This should be completed in the near future.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following actions should be considered for improvement:

- Issue an interim procedure for activation of the microwave phones in the permanent EOF.

- Use car mount antennae for offsite team radios to extend their range.

9. Changes to the Emergency Preparedness Program

The inspectors reviewed the licensee's records for distribution of the GSEP and EPIPs and the onsite and offsite review of emergency plan changes. There have been no changes in the emergency plan related to the organizational structure of the emergency organization; however,

the results of offshift augmentation drills indicated that additional personnel were needed to be available to ensure adequate shift augmentation. This was accomplished and subsequently placed in the appropriate procedure. All changes to the emergency plan and EPIPs were appropriately reviewed and distributed to comply with station Technical Specification requirements and the provisions of 10 CFR 50.54(q). There have been no changes to the administration of the emergency preparedness program since the last inspection of this area. Although the permanent EOF at Mazon, IL, is now operational, it has not yet been described in the Dresden Annex or appropriate EPIPs, and communications equipment (e.g., the blue microwave phones) that is currently installed at the EOF and TSC is also not described. The inspectors determined that these items should be included in the next GSEP revision. This is an Open Item (010/83-01-04; 237/83-01-04; 249/83-01-04).

Based on the above findings, this portion of the licensee's program is acceptable.

10. Licensee Audits

An audit of the GSEP is conducted annually by the corporate Quality Assurance Department utilizing an audit matrix that is designed to ensure that all aspects of the audit required by 10 CFR 50.54(t) are included. In addition, the offsite review of the GSEP is conducted by the Nuclear Safety Group, which has no emergency response function. An audit of the station GSEP was conducted during 1982. Although the audit did include the adequacy of interfaces with State and local governments, it did not address the review of the EALs with State and local agencies as required by the regulations. As a result, this deficiency was not identified by the licensee. In addition, a copy of this portion of the audit was not provided to them. The licensee stated that this review would only be forwarded to them if deficiencies in this area were identified. However, the results of the audit were available in the Corporate Office and at the site if representatives of these offsite agencies wished to review them. The offsite review of the GSEP conducted by the Nuclear Safety Group included several recommendations which were resolved prior to issuing Revision 3 of the generic portion of the plan and Revision 2 of the Dresden Annex.

A critique is conducted at the conclusion of each drill and exercise. Weaknesses identified during the critique are assigned for correction; however, there is no formal tracking program to ensure that these corrections are completed. The licensee used to maintain an informal tracking system to make sure that deficiencies identified at a particular exercise that had generic implications were corrected at all sites, but this system has not been used recently.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following matters should be considered for improvement:

- Include the requirement for offsite review of EALs in the QA audit program.

- Reinstitute the tracking system to assure completion of corrective actions to resolve deficiencies identified during drills and exercises.

11. Knowledge and Performance of Duties (Training)

The inspectors reviewed the licensee's training program, including lesson plans, drills, and training records of selected key emergency response personnel. Emergency training program course content, tests, and employee feedback were discussed with the Training Supervisor and training instructors. Employee records were reviewed to verify that initial training and retraining were provided. During the inspection, the inspectors encountered difficulty in tracking individual training records for specific sections of the emergency preparedness training program. Adequate records were maintained by the Training Department, but not in sufficient detail to demonstrate that all key emergency response personnel have in fact received all required emergency response training. A subsequent search of all training documentation resulted in a determination that all required training had been conducted, but this search was very time consuming.

The Production Training Department has overall responsibility for ensuring that necessary training is performed. The Station Training Department actually performs the training at the direction of the Production Training Department. The Training Supervisor is responsible for maintaining records of training performed by the station training staff.

Walkthroughs were conducted with all available Shift Engineers and the inspectors determined that they could perform their assigned emergency functions, including emergency classification, protective action decisionmaking, and notifications. Although all Shift Engineers were able to easily locate the classification procedure, some difficulty was encountered in locating the protective action recommendations table (Table 1 in EPIP 300-1). This problem could be alleviated by utilizing tabs for procedures and tables that would be used by the Shift Engineer. These tabs should include the title of the table or procedure.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following matters should be considered for improvement:

- Provide sufficient information in training records (such as course title) to determine the type of training received, e.g., EAL classification, protective action recommendations, communications, notification requirements, etc.

- Place tabs at the most used procedures and tables indicating their location in the EPIPs. Tabs should at least include the title of the table or procedure.

12. Exit Meeting

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on January 7, 1983. The inspectors summarized the scope and findings of the inspection. The licensee made the following remarks in response to certain items discussed by the inspectors:

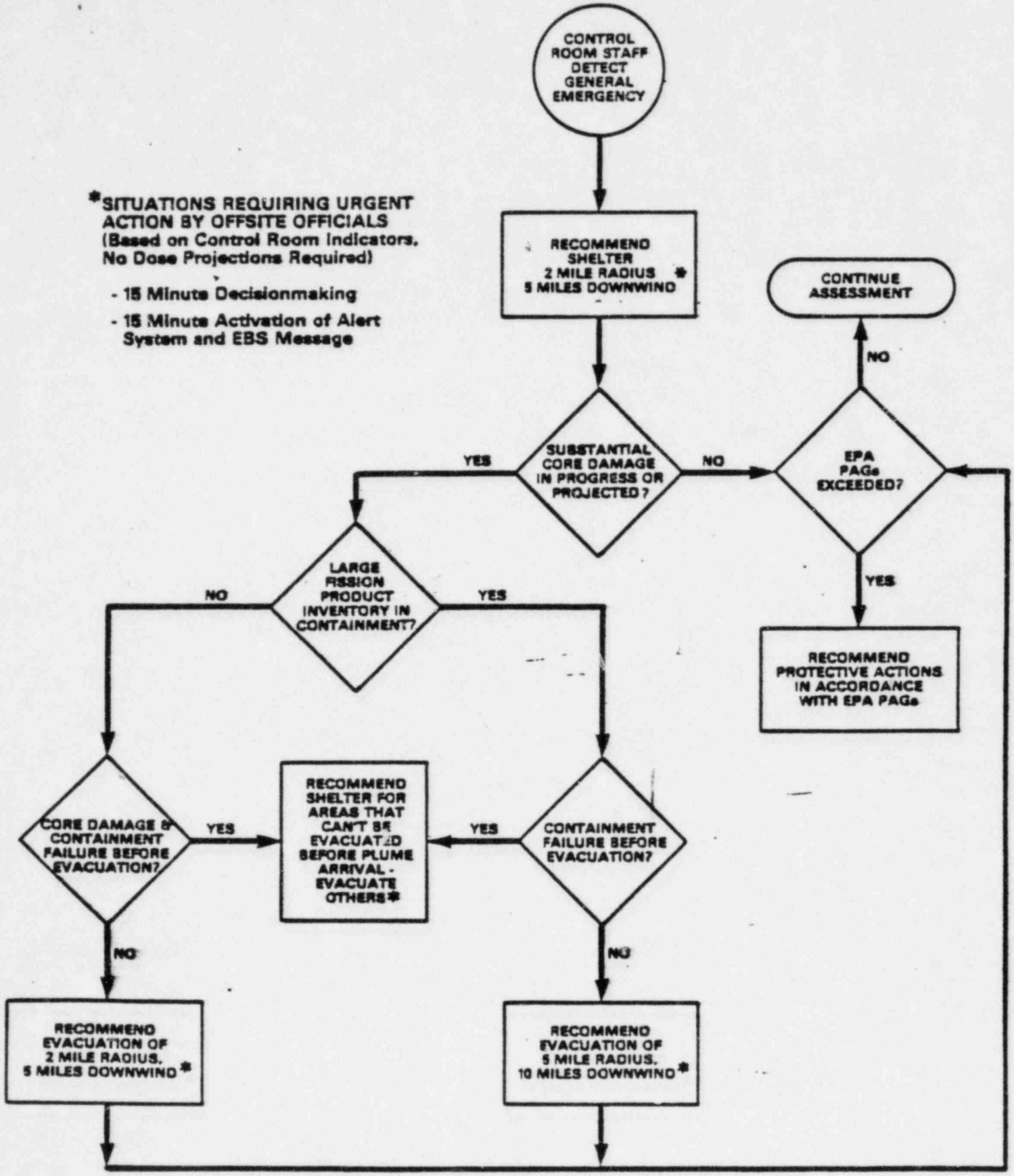
a. The licensee felt that they already meant the intent of the fifteen minute notification requirement for offsite agencies.

b. The licensee agreed to review and consider the improvement items discussed.

Attachment: Attachment 1, Flow Chart for Rapid Offsite Protective Decisions

ATTACHMENT 1
FLOW CHART FOR RAPID OFFSITE PROTECTIVE DECISIONS

The following actions will be based on observable instrumentation and plant status indicators (EALS) in the Emergency plan and reviewed by offsite officials.



SOURCE: Appendix 1, NUREG-0654/FEMA-REP-1, Rev. 1

For all evacuations, shelter the remainder of the plume EPZ and relocate the population affected by any ground contamination promptly following plume passage.