

Docket No. 50-346

License No. NPF-3

Serial No. 1-358

May 20, 1983



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Mr. James G. Keppler, Regional Administrator
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your April 22, 1983 letter (Log No. 1-775, Inspection Report No. 50-346/83-03), referencing deficiencies in the emergency preparedness program for the Davis-Besse Nuclear Power Station, Unit No. 1.

Following an examination of the items of concern in Appendix A, Toledo Edison herein offers information regarding each item.

Deficiency: 10 CFR 50, Appendix E, Section IV.D.3 requires that licensees have the capability to:

Notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.

Furthermore, 10 CFR 50.47, Paragraph (b)(5) requires that:

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

Sections 5 and 6 of the licensee's Emergency Plan identify the Shift Supervisor as interim Emergency Duty Officer (EDO) and summarize his duties in an emergency situation, with reference to applicable Emergency Plan Implementing Procedures (EPIPs).

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Contrary to the above, the following deficiencies were identified:

Procedures EI 1300.02 through 1300.05, and associated checklists, do not provide assurance that the interim EDO has the 24-hour capability of adequately accomplishing all initial and followup notifications to offsite authorities for any Emergency Action Level (EAL) until properly relieved of such responsibility.

Procedure EI 1300.02 does not provide adequate guidance regarding contents of initial and followup messages to offsite authorities and a mechanism for documenting message content.

Checklists associated with Procedures EI 1300.01 through 1300.05 contain no provisions for documenting when the Ottawa County Sheriff was initially notified of an Emergency Action Level (EAL) declaration; who received initial and followup notification at the Sheriff's Office and at the NRC; and no reminder that the Sheriff's Office must be notified within 15 minutes of an EAL declaration.

The licensee has no procedure whereby initial and followup offsite agency notifications of an emergency declaration are adequately documented when such notifications accomplished by the Station Superintendent or Shift Supervisor.

Response: 1.) The interim EDO has full capabilities to accomplish 24-hour notifications and follow up messages. The Ottawa County Sheriff is notified by phone through his dispatcher, which is a 24-hour position. An unlisted phone number is also provided for this notification. In the event that both the normal and unlisted line are unavailable, a back-up radio link is provided.

Procedures EI 1300.02 through 1300.05 will be revised to re-emphasize the methods available for contacting the Ottawa County Sheriff.

Checklists for EI 1300.02 through 1300.05 will also be revised to include provisions for documenting notifications to the Ottawa County Sheriff, who received the message, and message content. Provisions will also be added to notify the Sheriff within 15 minutes of an emergency declaration.

- 2.) Training on the above revisions will be given to the Shift Supervisors and EDO's in the form of required reading and as classroom instruction during the annual Emergency Plan Training.
- 3.) The above procedure revisions will be completed by September 1, 1983. Annual Emergency Plan Training for the Operations Group has been scheduled to be completed by November 30, 1983.

Deficiency: 10 CFR 50.47, Paragraph (b)(10), requires that:

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

Section 6 of the licensee's Emergency Plan states the emergency duties of the Shift Supervisor (interim EDO) include recommending protective actions for public protection as needed prior to the arrival of the EDO.

Contrary to the above, the following deficiency was identified:

The interim EDO (Shift Supervisor) is provided with inadequate guidance in Procedure EI 1300.05 regarding Protective Action Recommendation decision making with particular attention to decision making during the first hour of an emergency.

- Response:
- 1.) This guidance in EI 1300.05, General Emergency, is adequate for the Shift Supervisors to provide recommendations for offsite protective actions in the absence of the Emergency Duty Officer. However, a flow chart, as identified in IE Information Notice No. 83-28, providing additional guidance to the Shift Supervisor will be developed for plant specific data and included in EI 1300.05.
 - 2.) The above item will be emphasized during the annual Emergency Plan Training for Shift Supervisors.

- 3.) With the coordination necessary between Toledo Edison and offsite government agencies to develop a plant specific flow chart to be used for making immediate offsite recommendations, the revision to EI 1300.05 will be completed by January 1, 1984.

Deficiency: 10 CFR 50.47, Paragraph (b)(9), requires that:

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

Section 6 of the licensee's Emergency Plan states that the emergency duties of the Shift Supervisor (interim EDO) include dispatching radiation monitoring teams to onsite locations. Section 6 also addresses the need for calculating radiological dose estimates and projections for licensee and offsite agency use in determining the necessity for protective actions.

Contrary to the above, the following deficiencies were identified:

The Shift Supervisor (interim EDO) is provided with inadequate guidance for the first hour of an emergency regarding task prioritization and onsite sampling and monitoring requirements to be accomplished by Chemistry and Radiation Testers for various emergency conditions.

The licensee has not made adequate provisions to ensure that dose assessment can be made based on potential offsite consequences from various onsite radiological parameters such as the high range containment dome monitors and containment atmosphere sample system.

Response: 1.) A revision to EI 1300.05 will be made to provide the Shift Supervisor guidance regarding prioritization of responsibilities of the Chemistry & Radiation Tester (C&RT) and to ensure that the primary responsibility of the C&RT is to assist in preventing releases from the Station or exposure to individuals in the Station.

In addition, EI 1300.07 has been modified to include provisions to make dose assessments based on potential offsite consequences from the high range containment radiation monitor readings.

- 2.) Training on the above revisions will be given in the form of required reading and as classroom instruction during annual Emergency Plan Training.
- 3.) The revision to EI 1300.05 will be completed by September 1, 1983. Annual Emergency Plan Training for the Operations Group has been scheduled to be completed by November 30, 1983.

Following an examination of the items of concern in Appendix B, Toledo Edison herein offers information regarding each item.

Deviation: In Appendix B to the letter dated April 20, 1982, from R. P. Crouse, Vice President, Nuclear to J. G. Keppler, Regional Administrator, NRC, the licensee committed to make the following emergency preparedness improvements pursuant to the NRC Emergency Preparedness Appraisal of February 8-19, 1982:

<u>Item 4 (Appendix B)</u>	<u>The OSC should be equipped with fixed emergency lighting.</u>
<u>Commitment</u>	<u>A Facility Change Request will be prepared to install eight hour battery pack emergency lighting.</u>
<u>Item 5 (Appendix B)</u>	<u>All primary coolant sample lines at the rear of the emergency sample module should be provided with shielding.</u>
<u>Commitment</u>	<u>The shielding portion (of this work) will be completed by January 1, 1983.</u>
<u>Item 20 (Appendix B)</u>	<u>Procedure HP/1602-01, External Personnel Monitoring, should be replaced by emergency personnel monitoring procedures.....including provision for TSC, ECC, and OSC personnel.</u>

Commitment " Toledo Edison will develop new personnel monitoring procedures which will be in use by September 1, 1982.

Contrary to the above, during the inspection conducted March 15-18, 1983, the following deviations were identified:

Item 4 Although a Facility Change Request was submitted, emergency lighting was not installed. The licensee established a January 1, 1983 deadline for completing this task; however this was not done. Further, this item was given a low priority and no new completion date has been established.

Item 5 Shielding of the primary coolant sample lines was not completed at the time of the inspection.

Item 20 Emergency personnel monitoring procedures were not developed for Control Room and OSC personnel.

Response: Item 4 The priority on this item has been discussed during Toledo Edison's prioritization activity and included in our Integrated Living Schedule Program (ILSP) for 1984 activities. However, in lieu of fixed emergency lighting, portable lighting will be added to the equipment for the OSC. This will be submitted for reprioritization and installed in 1983.

Item 5 The sample lines on the interim primary coolant lines have been shielded with lead bricks and lead blankets.

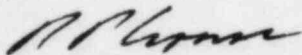
Item 20 Personnel in the Control Room and in the OSC are provided dosimetry per procedure HP 1602.01, External Personnel Radiation Exposure Monitoring. This procedure is being revised such that all Station personnel will be issued TLD's, as well as self-reading dosimetry, upon entering the Protected Area. Thus, for an emergency condition, all Station personnel will have

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emergency dosimetry already in their possession. This procedure revision will be completed by September 1, 1983.

If you have any questions, please contact Judith Hirsch, Emergency Planning Supervisor.

Very truly yours,



RPC:WLY:nlf
cc: DB-1 NRC Resident Inspector