

APPENDIX A

NOTICE OF DEFICIENCIES

As a result of the inspection conducted on March 15-18, 1983, the following deficiencies in your emergency preparedness program were identified:

1. 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).

DEFICIENCIES

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. (Paragraphs 3 and 4)(346/83-03-01)
- . 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. (Paragraphs 3 and 4)(346/83-03-02)
- . 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. (Paragraphs 3 and 4)(346/83-03-03)

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. (Paragraphs 3 and 4)(346/83-03-04)

2. 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.

DEFICIENCY

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. (Paragraph 5)(346/83-03-05)

3. 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.

DEFICIENCIES

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. (Paragraph 5)(346/83-03-06)

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. (Paragraph 6)(346/83-03-07)