

AUG 19 1991

Docket No. 50-285/91-08
License No. DPR-40

Omaha Public Power District
ATTN: W. G. Gates, Division Manager
Nuclear Operations
444 South 16th Street Mall
Mail Stop 8E/EP4
Omaha, Nebraska 68102-2247

Gentlemen:

Thank you for your letter of July 17, 1991, in response to our letter and inspection report dated June 14, 1991. We have reviewed your reply and find it responsive to the concerns raised in our inspection report. With respect to the remaining item in regard to personnel in the Operations Support Center (OSC) without self-reading dosimetry (SRDs), we did not record names and did not know at the time whether they were exercise participants. The same personnel were observed over an hour later participating in the exercise and in possession of SRDs. We accept your explanation that OSC participants were issued dosimetry. Under the circumstance, we cannot provide sufficient information to permit productive further investigation of the timing of dosimetry distribution to these personnel. We will review the implementation of your corrective actions during a future inspection.

Sincerely,

Original signed by
Thomas P. Gwynn for

Samuel J. Collins, Director
Division of Reactor Projects

cc:
LeBoeuf, Lamb, Leiby & MacRae
ATTN: Harry H. Voigt, Esq.
1333 New Hampshire Avenue, NW
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Washington County Board
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ATTN: Jack Jensen, Chairman
Blair, Nebraska 68008

Combustion Engineering, Inc.
ATTN: Charles B. Brinkman, Manager
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RIV:RPEPS ~~hrs~~ C:RPEPS
*DBSpitzberg:nh *BMurray
8/14/91 / /91
*Previously concurred.

AB
D:DRP
ABBeach
8/15/91

[Signature]
D:DRP
for SJC Collins
8/14/91

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G PDR

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AUG 19 1991

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Omaha Public Power District

bcc to DMB (AO-45)

bcc with copy licensee's letter:

Resident Inspector
Liz Shea, RM/ALF
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D. B. Spitzberg, RPEPS
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File w/IR 91-0

Omaha Public Power District
444 South 16th Street Mall
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402/636-2000

JUL 22 1991

July 17, 1991
LIC-91-189R

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, DC 20555

- References:
1. Docket No. 50-285
 2. Letter from NRC (S. J. Collins) to Omaha Public Power District (W. G. Gates) dated June 14, 1991 (NRC Inspection Report No. 50-285/91-08)

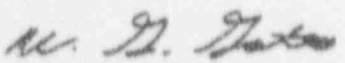
Gentlemen:

SUBJECT: Responses to Weaknesses Identified During 1991 Annual Emergency Exercise

In Reference 2, Omaha Public Power District was requested to provide to the NRC responses to the subject exercise weaknesses. The attached responses include causes, corrective measures, and schedules for completing these measures.

Please contact me if you should have any questions.

Sincerely,



W. G. Gates
Division Manager
Nuclear Operations

WGG/sel

Attachment

- c: LeBoeuf, Lamb, Leiby & MacRae
D. D. Martin, NRC Regional Administrator, Region IV
W. C. Walker, NRC Project Manager
R. P. Mullikin, NRC Senior Resident Inspector

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RESPONSES TO ANNUAL EMERGENCY EXERCISE WEAKNESSES

Weakness 285/9108-01

"Failure to exercise proper radiological controls in the OSC was identified as an exercise weakness."

Reasons

Omaha Public Power District (OPPD) conducted an investigation of the Radiation Protection (RP) functions performed in the Operations Support Center (OSC) and the Technical Support Center (TSC) to determine why the habitability criteria in EPIP-EOF-11, "Dosimetry Records, Exposure Extensions and Habitability", section 5.4 were not met.

1. It was determined that the OSC Radiation Protection (RP) Coordinator made a conscious decision to perform only radiation level surveys during the time frame indicated due to the following reasons:
 - a. The RP Coordinator and the TSC Protective Measures Coordinator discussed the release pathway in conjunction with the degrading plant conditions. Based on the information known to both parties at that time, it was presumed that the noticed increase in radiation levels was due to plume shine as OSC radiation levels were constant regardless of location or sampling height.
 - b. The scenario-driven loss of normal power in the OSC location caused a loss of lighting and power for counting instrumentation.
 - c. Increasing background radiation levels throughout the majority of the station site made counting instruments unusable.

The Protective Measures Coordinator's log indicates that at 1228 hours, it was decided to set up an alternate counting location in the TSC; however, access to the TSC was being limited to prevent further contamination of the TSC envelope, making transport of any samples to the alternate counting location impossible.

Investigation concluded that the decision to suspend air sampling was in error. Air samples should have been continued and saved for later analysis, as needed. Contamination surveys, however, could not be analyzed assuming the background levels presented via the scenario; therefore, that decision was justifiable but not necessarily appropriate.

2. An OSC RP Technician performed a whole body count after the dose rates had dropped down, but just prior to the discovery of the elevated contamination levels. Once this was discovered, the RP Technician determined that due to the room shielding, the geometry of the counting device and floor level contamination, the count results would not be affected greatly.
3. OPPD has not identified any exercise participants without dosimetry, however, there were several non-players who momentarily were in the OSC area until told to stay clear of the exercise. The OSC logs indicate that dosimetry was issued to OSC participants.

Corrective Actions and Schedules

1. OPPD will revise EPIP-EOF-11, "Dosimetry Records, Exposure Extensions and Habitability," to include better guidance on when, and how often, habitability surveys are needed under various radiological conditions. The revision will also include guidance on alternate sampling locations. This action will be completed by October 31, 1991.
2. Further evaluation of the accuracy and availability of the whole body counter at various background levels will be completed and subsequent instructions on its use under emergency conditions will be included in EPIP-EOF-11 and/or other appropriate operating instructions. This action will be completed by October 31, 1991.

Weakness 285/9108-02

"The use of maps containing obsolete information to describe a field team's location is considered an exercise weakness."

Reasons

OPPD conducted an investigation of obsolete maps within the field monitoring vehicles which revealed that both field monitoring vehicles contained the new, updated maps. However, one vehicle also had a copy of an old 10 mile EPZ map. Route instructions in both vehicles were found to contain some discrepancies. It should be noted that the OPPD field team was at the appropriate sampling location, regardless of the map having incorrect siren numbers.

Corrective Actions and Schedules

1. The Emergency Planning Department performed an inventory of both field monitoring vehicles and removed one outdated, incorrect map.
2. Route instruction books have been produced containing new, updated color maps (including the correct siren numbers) and corrected route instructions; these books were placed in each field monitoring vehicle.

Weakness 285/9108-03

"The failure to accurately detect, assess, and correlate plant conditions with radiological releases and dose assessment functions was identified as an exercise weakness."

Reasons

OPPD conducted an investigation concerning this weakness. It was determined that the dose assessment function needs additional support in release path analysis and verification. Some initial concepts include a flow-chart style of procedure to assist in determining potential release paths and correlating respective plant parameters (conditions). This would allow someone to verify a release path and assist the dose assessment function.

Corrective Actions and Schedule

OPPD will conduct further evaluations into the most appropriate method to perform release path analysis and verification, and determine which ERO position should perform this task. Results of this determination will be incorporated into appropriate emergency procedures by October 31, 1991.