

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-266/83-14(DRMSP); 50-301/83-14(DRMSP)

Docket Nos. 50-266; 50-301

Licenses No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company  
231 West Michigan  
Milwaukee, WI 53201

Facility Name: Point Beach Nuclear Plant, Units 1 and 2

Inspection at: Two Creeks, WI

Inspection Conducted: July 18-22, 1983

Inspectors: *W.G. Snell*  
W. G. Snell

8/16/83  
Date

*M.J. Smith*  
M. J. Smith (trainee)

8/16/83  
Date

Approved By: *W.L. Axelson*  
for W. L. Axelson, Chief  
Emergency Preparedness Section

8/16/83  
Date

Inspection Summary

Inspection on July 18-22, 1983 (Reports No. 50-266/83-14(DRMSP); 50-301/83-14(DRMSP))

Areas Inspected: Routine, announced inspection of the following areas of the Emergency Preparedness Program: Licensee actions on previously identified items; emergency detection and classification; protective action decisionmaking; notifications and communications, changes to the emergency preparedness program; shift staffing and augmentation, including compensatory measures; dose calculation and assessment; public information program; licensee audits; and emergency worker protection. The inspection involved 166 inspection-hours on site by two NRC inspectors and two consultants.

Results: No items of noncompliance or deviations were identified.

## DETAILS

### 1. Persons Contacted

- \*J. Zack, Manager, PBNP, WEPCO
  - I. Bleeker, Shift Superintendent
  - C. Gray, Shift Superintendent
  - T. Garot, Shift Superintendent
  - L. Kamyszek, Shift Superintendent
  - R. Mitchell, Shift Superintendent
- \*G. Maxfield, Superintendent, Operations
- \*J. Knorr, Emergency Planning Coordinator
- \*J. Reisenbuechler, Superintendent, Technical Services
  - B. Link, Superintendent, EQRS
  - J. Schweitzer, Inservice Inspection Engineer
  - A. Pohl, Nuclear Plant Engineer
- \*P. Skramstad, Superintendent, Chemistry and Health Physics
  - R. Bredvad, Superintendent, Health Physics
  - T. Slack, Chemistry Lab Supervisor
  - C. Nash, Nuclear Plant Specialist
  - K. Rathigaber, Nuclear Plant Specialist
  - R. Arnold, Chemistry Technician
  - L. McDonnell, Wisconsin Department of Health and Social Services, Radiation Protection Section
  - B. Utic, National Weather Service, Green Bay, WI
  - N. Crowley, Director, Manitowoc County Emergency Government
  - M. Brandt, Director, Manitowoc Department of Social Services
  - B. Hanson, Kewaunee Department of Social Services

\*Denotes those present at the exit interview.

### 2. Scope of Inspection

This inspection was conducted to followup on open items identified during the Emergency Preparedness Implementation Appraisal (EPIA) conducted January 4 - 15, 1982; the EPIA follow up inspection conducted January 31 - February 4, 9, 23, and 25, 1983; to examine compensatory measures for shift staffing and augmentation addressed in a letter dated June 10, 1983, from Mr. J. A. Hind to Mr. Sol Burnstein, and to conduct the routine annual emergency preparedness inspection.

### 3. Licensee Action on Appendix A Deficiencies in NRC Inspection Report Nos. 50-266/82-02, 50-301/82-02

- a. 266/82-02-01, 301/82-02-01 (Closed) Minimum Shift Staffing and Augmentation

#### DEFICIENCY

The licensee shall provide a description of how they intend to meet the minimum shift staffing guidance of NUREG-0654, Table B-1. This

initiated within 15 minutes of the initial classification---." These latter three procedures are therefore inconsistent and do not clearly meet the intent of the regulations that initial offsite notification be completed, not initiated within 15 minutes of initial classification. The inspectors recommend that the terminology used in these procedures to notify state and local governmental authorities be clarified and made consistent. This item is otherwise considered adequate. This item is closed.

4. Licensee Action on Appendix D (Open Items) NRC Inspection Report Nos. 50-266/82-02, 50-301/82-02

a. 266/82-02-23, 301/82-02-23 (Open) Post Accident Sampling System

ITEM

Installation of the Post Accident Sampling System, including upgrading of (1) primary coolant sampling, (2) containment atmosphere sampling, and (3) various station effluent sampling.

CORRECTIVE ACTION

Although the procurement of a new post accident sampling system was planned, it was determined after further study to retain and upgrade the in-place system. Exposure studies are currently in progress on the in-place systems. This item will remain open.

b. 266/82-02-24, 301/82-02-24 (Open) Steam Line Monitors

ITEM

Installation of main steam line monitors and calculation of EALs for these monitors.

CORRECTIVE ACTION

According to the Superintendent of Chemistry and Health Physics and the Emergency Plan Coordinator the main steam line monitors have been installed calibrated and are in operation. However EALs based on these monitors have not yet been determined.

The inspector verified that readings from these monitors can be called up and read out in the control room. However, records of calibrations and scheduled tests were not inspected. This item will remain open until EALs have been developed, reviewed, and incorporated in the licensee's emergency plan and procedures.

c. 266/82-02-25, 301/82-02-25 (Open) High Range Containment Monitor

ITEM

Installation of the high range containment dome monitor including calculations of EALs for this monitor.

CORRECTIVE ACTION

The high range containment dome monitors have been installed and are operating in both Units 1 and 2. The monitor in Unit 2 has been calibrated, but the monitor in Unit 1 has not. EALs have not been determined for either unit. This item will remain open until Unit 1 monitor is calibrated and EALs are calculated for an Alert, Site Area and General Emergency condition.

5. Licensee Action on Other Open Items, NRC Inspection Report Nos. 50-266/83-01, 50-301/83-01

a. 266/83-01-01, 301/83-01-01 (Closed) Dispersion Classification

A table for determining stability based on cloud cover, wind speed, time of day and incoming solar radiation is contained in EPIP 1.4, Attachment 1.4-3. However, for wind speeds less than 4 mph at night, the table was left blank. Attachment 1.4-3 of EPIP 1.4 should be revised to include the correct stability indicator during nighttime conditions for wind speeds less than 4 mph.

CORRECTIVE ACTION

The inspector examined Attachment 1.4-3 of EPIP 1.4, Revision 7 dated May 27, 1983, and found that the table had been corrected. This item is acceptable.

6. New Open Items

a. New Item 266/83-14-01, 301/83-14-01 Stability Classification

During examination of EPIP 1.4, Radiological Dose Evaluation, the inspector noted that the primary indicator for determination of atmosphere stability was sigma theta. However, at low windspeeds (less than 3 mph), sigma theta is a poor indicator of stability and should not be used. It was found that EPIP 1.4 makes no reference to the use of Attachment 1.4-3, which is the method to be used in place of sigma theta for windspeeds less than 3 mph. Therefore, the procedure should be modified to state that at wind speeds less than 3 mph, Attachment 1.4-3 will be used. The inspector noted that a message stating not to use sigma theta below 3 mph was attached to the meteorological recorder in the control room.

b. New Item 266/83-14-02, 301/83-14-02 Procedural Errors

During examination of various EPIPs, the inspectors noted the following errors in the procedures:

EPIP 2.3: Step 5.2.6 references step 5.1.3. There is no step 5.1.3.

EPIP 3.3: Steps 5.2.3 and 5.2.6. reference step 5.1.2. There is no step 5.1.2.

EPIP 4.3: Step 5.2.3 references step 5.1.4. Step 5.2.6 reference step 5.1.2. There are no steps 5.1.4 and 5.1.2.

EPIP 5.3: Step 5.2.3 references step 5.1.4. Step 5.2.6 references step 5.1.6. There are no steps 5.1.4 and 5.1.6.

EPIP 4.1, step 5.4.3, and EPIP 5.1, step 5.4.3 both refer to EPIP 3.3, Alert-Offsite Agency Notification, whereas they should refer to the notification procedure for the applicable emergency class.

The above EPIP procedures should be corrected.

## 7. Routine Inspection Items

### a. Emergency Detection and Classification (I.E. Procedure 82201)

Walkthroughs with five Shift Superintendents demonstrated an adequate ability to utilize post-TMI indicators for core damage and containment failure status. However, because some of these indicators have only recently been installed (e.g., high range containment monitors) the inspectors noted a lack of total familiarity with their use.

Initial classification of an event is the joint responsibility of the Shift Superintendent and the Duty and Call Superintendent (DCS). However, all Shift Superintendents clearly understood that if the DCS could not be reached, they had the authority and responsibility to classify the event without delay. Walkthroughs showed that plant personnel had a high level of understanding of the emergency classifications and were well trained in properly using the procedures to arrive at the correct classification.

Examination of EIPs and walkthroughs with several plant Shift Superintendents indicated that the procedures adequately addressed the classification of EALs. The inspectors presented a set of plant parameters which would have indicated core degradation in the walkthroughs. Each individual responded in an adequate manner, using the emergency procedures to effectively mitigate the emergency situation. Meteorological parameters were included in the walkthroughs.

Other aspects of this inspection procedure are discussed in Section 7.b below and NRC inspection report Nos. 50-266/83-01, 50-301/83-01.

### b. Protective Action Decisionmaking (I.E. Procedure 82202)

The inspectors reviewed the licensee's plan, procedures, and capabilities for protective action decisionmaking to evaluate the capability to analyze emergency conditions and promptly initiate recommendations to offsite agencies.

Walkthroughs of various plant events were performed with a cross section of the plant staff, including five Shift Superintendents, two Duty Technical Advisors, and two Duty and Call Superintendents.

Inadequacies in the procedures and training for protective action decisionmaking were noted. EPIP 1.5, Protective Action Evaluation, is ambiguous regarding the authority and responsibility of the licensee to provide protective action recommendations to offsite agencies. The procedure and associated training also should provide guidance on the use of factors other than calculated doses to formulate protective action recommendations. Awareness of the relationship between core conditions, possible offsite consequences and effectiveness of protective measures was not demonstrated by all persons interviewed. Licensee personnel generally did not state that they would make a minimum recommendation of shelter within two miles of the plant (and five miles downwind) within 15 minutes of declaration of a General Emergency. The licensee's EPIPs did not provide guidance for the evaluation of core condition based on indications other than primary coolant sample results.

The licensee has provided training to the offsite agency officials responsible for making protective action decisions. Through a review of records and training plans, it was determined that the training and information on protective action decisionmaking provided by the licensee to offsite officials was adequate. Communication checks were performed to demonstrate that offsite officials with the authority and responsibility for protective action decisionmaking could be contacted by primary and back-up methods.

Improvement in the area of protective action decisionmaking is needed and is an Open Item. (266/83-14-03; 301/83-14-03)

The inspectors recommend the following:

1. The licensee's procedure for activation of the TSC should ensure that offsite dose assessment and formulation of protective action recommendations will be undertaken promptly.
2. EPIP 1.5, Protective Action Evaluation, should provide the Technical Support Manager with criteria for the formulation of protective action recommendations based on factors other than calculated offsite doses.
3. The licensee's EPIPs should provide guidance for the evaluation of core condition based on indications other than primary coolant sample results (e.g. containment radiation, hydrogen concentration, thermocouple readings, etc.).
4. The licensee's emergency procedure training process should ensure that key emergency response personnel understand the relationship between core condition, possible offsite consequences and effectiveness of protective measures.

5. The licensee's EPIPs and associated training should be revised to eliminate any ambiguity with regard to the authority and responsibility of the licensee to provide protective action recommendations to offsite agencies.
6. The licensee's procedure for activation of the ESC should include provisions for a formal assumption of the responsibility for offsite dose assessment and formulation of protective action recommendations.

c. Notifications and Communications (I.E. Procedure 82203)

The inspector reviewed the licensee's procedures for notification of offsite agencies and plant personnel during emergency conditions. The procedures were found to be generally adequate for all levels of emergencies. One exception is that the licensee's Site Emergency and General Emergency notification procedures specify that the notification process is to be initiated within 15 minutes of the initial declaration, as opposed to being completed. Acceptable wording was discussed with the licensee.

The procedures and messages for notifying emergency response personnel were found to be adequate. Communications equipment in the emergency facilities was checked and found to be adequate. However, no telephone listing for the emergency facilities was available, except as shown on diagrams for setting up the facilities.

Communication drills are performed regularly and documented. An unannounced communications test was performed using primary and back-up equipment specified in the EPIPs. The initial attempt to contact the Manitowoc County Sheriff's Office dispatcher on the plant radio system was unsuccessful. After the dispatcher was contacted by telephone a successful radio check was conducted. The other prompt notification checks were performed by the Security Force Shift Lieutenant in accordance with the notification procedure and were satisfactorily completed.

Tests of the prompt notification siren system are performed monthly by the County Sheriff's department but are not documented onsite. The licensee's Emergency Plan Coordinator is informed verbally of the results of the tests and is responsible for any corrective maintenance on the siren system.

EPIP notification lists for plant personnel were spot checked and no discrepancies were noted.

The following recommendations for improving the emergency preparedness program in the area of emergency notification and communications should be considered:

1. For communication between emergency response facilities during an emergency, a concise telephone listing should be provided which identifies the work stations or emergency response organization titles.

2. Testing and maintenance of the siren system should be documented by the licensee.
  3. Procedures for offsite emergency notifications should be made consistent with the current guidance regarding notification of offsite agencies within 15 minutes of declaration of an emergency class.
- d. Changes to the Emergency Preparedness Program (I.E. Procedure 82204)

The inspector reviewed the Emergency Preparedness Program to examine any changes that had been made to the program and what their effect on the overall state of emergency preparedness was. An examination of the licensee's records and interviews with licensee personnel indicated that any changes that would significantly affect the approved Emergency Preparedness Program were submitted to the NRC for review and were not implemented prior to NRC approval, as required by 10 CFR 50.54(q). In addition, all temporary changes have been made permanent or cancelled.

The inspectors determined that all changes to the Emergency Plan and EIPs were submitted to the NRC within 30 days of such changes as required by 10 CFR 50.54(q) and 10 CFR Part 50, Appendix E, Section V. All plan changes that were not submitted for prior approval did not decrease the effectiveness of the plan.

Examination of Emergency Response Facilities (ERFs) and interviews with personnel indicated no significant changes in the ERFs have occurred since the last inspection. The interim ESC (EOF) is located onsite in the Energy Information Center. The permanent ESC is still under construction.

An examination of the licensee's administrative procedures indicated only minor changes in the licensee's organization since the last inspection. However, the Emergency Planning Coordinator was being trained as a Technical Advisor. This training has occupied about one half of his time since January, 1983. Through observation of records and procedures the inspector determined that this training was not having any detrimental impact on the implementation of the emergency preparedness program.

A review of the distribution of the changes to the procedures indicated all appropriate personnel and organizations were sent copies of changes to the Emergency Plan and Procedures as required by 10 CFR 50.47(b)(16).

An examination of the licensee's audit records and Emergency Plan indicated that the Letters of Agreement with Federal, State, and local agencies were severely outdated. The licensee stated that in the past they had either re-established the commitments verbally without making a written record or assumed the agreement was still good unless notified. The licensee committed to upgrade their procedures in this area. This is an Open Item 266/83-14-04; 301/83-14-04)



e. Shift Staffing and Augmentation (I.E. Procedure 82205)

The inspector reviewed the physical and administrative aspects of the shift staffing and augmentation procedures. The licensee has implemented the minimum staffing levels that they had requested in an exemption which was subsequently approved by the NRC in a letter to WEPCo dated June 10, 1983. The inspector examined the extensive compensating measures that formed the basis for the exemption and verified the program had been successfully implemented.

On March 5, 1983, a shift augmentation drill was conducted. Examination of the results of this drill indicated that the response was adequate to augment the staff in 30 and 60 minutes as committed. The licensee stated this drill would be conducted on an annual basis. However, the NRC recommends that shift augmentation drills be conducted semi-annually, particularly at sites such as Point Beach which have been granted an exemption to deviate from the staffing levels indicated in Table B-1 of NUREG-0654, Revision 1.

Shift augmentation is initiated by the Shift Superintendent contacting the Duty and Call Superintendent (DCS) via telephone or pager. The DCS then contacts a secondary DCS and the Duty and Call Chemistry and Health Physics Supervisor to discuss manpower needs. These personnel then continue the augmentation process by contacting other necessary personnel. The augmentation drill conducted on March 5, 1983, indicated that this method of notification provided an acceptable staffing level in a timely manner.

Call lists of personnel were examined and found to be up-to-date and adequate. These lists are reviewed on a monthly basis.

f. Knowledge and Performance of Duties (Training) (I.E. Procedure 82206)

During the routine safety inspection conducted on January 31 - February 4, 1983 (Inspection Report Nos. 50-266/83-01, 50-301/83-01), the inspectors reviewed the Point Beach Nuclear Plant Emergency Training Program to determine that a training program was established and maintained in accordance with 10 CFR Part 50.47(b)(15). The inspectors determined that a program was established and maintained in accordance with guidance criteria from NUREG-0654 Section II.0 that is consistent with 10 CFR Part 50.47(b)(15). The training/retraining program consisted of emergency training lesson plans in those areas that deal with emergency plan policies and procedures and identify the groups requiring specific training. Record keeping consisted of individual personnel files containing test results, date of training and any other information pertaining to the type of training completed.

During the routine inspection of July 18-22, 1983, the inspectors conducted detailed walkthroughs with numerous plant personnel to determine the adequacy of their training and knowledge in the areas of emergency detection, emergency classification, notifications, dose calculations, assessment actions, and protective action

decisionmaking. Walkthroughs were conducted with five Shift Superintendents, Superintendent Technical Services, Superintendent EQRS, Nuclear Plant Engineer, Superintendent Chemistry/Health Physics, Superintendent Health Physics, Chemistry Lab Supervisor, and Chemistry Technician. Overall, each of these plant personnel demonstrated they had an acceptable level of understanding and knowledge to carry out their emergency plan responsibilities if a real incident were to occur. More detailed discussions of these individual walkthroughs can be found throughout this report.

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

g. Dose Calculation and Assessment (I.E. Procedure 82207)

The licensee's Emergency Plan Implementing Procedures for calculating and assessing doses for anticipated release were reviewed by the inspectors. EPIP 1.8, Emergency Offsite Dose Estimations, provided a step-by-step approach to the initial dose projections and the classification of an accident. This procedure is to be used only for immediate initial dose projections. EPIPs 1.4, Radiological Dose Evaluation, and EPIP 1.5, Protective Action Evaluation, provides a more refined step-by-step method of classifying an accident when more information such as air samples, meteorological data, and offsite survey dose measurements become available.

Utilizing the data obtained upon a walkthrough of EPIPs 1.2, Plant Status, and 1.3, Estimation of Source Term, the Chemistry and Health Physics Superintendent provided the inspector with a detailed explanation of how the classification of an accident and appropriate protective actions would be determined. A walkthrough of the emergency offsite dose estimation procedure with a number of Shift Superintendents indicated a lack of familiarity with the procedure as well as the need for additional training to increase their capability and confidence in accomplishing the required steps. The inspector contacted the Chief of Radiation Protection of the Wisconsin Department of Health and Social Services (WDHSS), and reviewed the notification procedure for that organization and methods of dose calculations and assessment. The WDHSS Radiation protection personnel provide a dose assessment team for the state EOC. Initial dose calculations can be accomplished on an IBM personnel computer with a program reported to have been provided by NRC Region III personnel.

The Chief of the Radiation Protection Section indicated they have completed a comparison of results based on similar input data supplied by Point Beach and have obtained a reasonable agreement of results.

He did identify there are differences which he termed as being "generic". However, he indicated these "generic" differences have been identified and discussed with licensee and NRC representatives and efforts to resolve the differences are in progress.

The licensee's EIPs provide a basis for classification of an accident based on estimated off-site doses using EPIP's 1.4, 1.5, and 1.8. A walkthrough of the Chemistry and Health Physics Superintendent indicated that he understood the procedure, how to obtain necessary data, and use of the available forms for documentation of results. He demonstrated his ability to explain each of the steps involved.

The TSC/OSC was examined and the availability and maintenance of assessment and classification aids was verified. Status boards, isopleth overlays for all stability classifications, communications, etc., were maintained. In addition, the records of routine inventory checks of appropriate equipment at both the TSC/OSC and SBCC used in the classification of accidents and providing onsite and offsite dose measurements were reviewed by the inspector. No significant discrepancies were noted in the records of such inventories maintained by chemistry and health physics personnel.

Evaluation of the ability of the ESC personnel to accomplish dose assessment procedures was not inspected during this visit. Walkthroughs and interviews were conducted with chemistry technicians and health physics first line supervisory and operational personnel. The individuals contacted appeared to be versed on the general content of the emergency plan and the EIPs applicable to their emergency plan assignments.

Individuals assigned to offsite monitoring team duties at the Site Boundary Control Center (SBCC) appeared to be knowledgeable of the duties, equipment, and procedures associated with their emergency plan assignments. The responses of a few of the first line chemistry and health physics personnel who were interviewed indicated a need for additional training with respect to the guidelines and methods of authorizing radiation exposure in excess of 10 CFR Part 20 limits. The licensee stated they were presently going through retraining in these areas.

The accomplishment of certain procedural steps in EPIP-7.3.2 Section 3.0, Reactor Coolant Sampling Procedure, were described by the individuals participating in the walkthrough as being capable of producing spraying and/or dripping during the disconnect of the "sample bomb." Such spraying and dripping could, under emergency conditions, present a very real potential for significant personnel exposure and contamination as well as airborne and area contamination. A review of this procedure and others including the potential for exposure of personnel and equipment to possibly very high level external contamination should be undertaken. Efforts should be directed toward elimination or containment of such exposure and contamination potential.

h. Public Information Program (I.E. Procedure 82209)

The inspector verified that an informational publication for the public has been developed, updated, and redistributed annually.

Wisconsin Electric (Point Beach Nuclear Plant) and Wisconsin Public Service (Kewaunee) coordinate the development and distribution of the publication. The publication is distributed to all postal patrons in all townships located in the 10 mile EPZ. All information specified in 10 CFR Part 50, Appendix E, Part IV.D.2 and NUREG 0654 are located in the publication. The updated publication for August 1983, is the responsibility of Wisconsin Public Service. Radio Stations, Evacuation Routes, Information to the Handicapped, and sheltering information were all clearly identified in the publication. The licensee contacted both General and Wisconsin Telephone regarding the use of telephone books containing a page with emergency information. Both telephone companies were disinterested.

A small group of Vietnamese have located in the community of Two Rivers, therefore, the licensee has provided pre-recorded emergency information tapes in the Vietnamese language to local radio stations. In addition, they have provided the local police with copies of these tapes and recorders to enable them to broadcast over PA systems in their squad cars.

Telephone interviews were held with Manitowoc and Kewaunee County emergency government personnel regarding training and updating of information by the licensee. The licensee relationship with local and State offsite officials is active and yearly training is conducted by the licensee. One inspector traveled to Point Beach State Park to discuss protective emergency actions. The Warden and his new assistant were both on vacation. Other park personnel interviewed were aware of some information available, but were unable to locate it. This problem was discussed with the Emergency Planning Coordinator who indicated he would meet with park officials. He indicated he meets semi-annually with officials to keep them informed and to check their supply of publications.

i. Licensee Audits (I.E. Procedure 82210)

An examination of the Emergency Plan indicates that reviews of the emergency preparedness program are conducted annually. The procedure, EPIP 15.4 Section 3.0, states "the scope and frequency schedule will be reviewed on at least an annual basis... in preparation for the audit. This review shall be completed on an annual basis with the scope and depth varying on a two-year cyclical basis. The audit should include items in Section 4.0".

Examination of audit records, however, did not clearly indicate that all areas of Section 4.0 of EPIP 15.4 had in fact been reviewed in a two-year cycle. However, it is difficult to state that all areas of Section 4.0 were not completed during a two-year period as not all records were available at the site for examination. The adequacy of the licensee's audit program in meeting the requirements of 10 CFR 50.54(t) is an unresolved item. (266/83-14-05, 301/83-14-05)

Documentation and records of audit and reviews should clearly indicate areas reviewed, areas completely audited, results, and implementation of procedures to correct any inadequacies.

j. Emergency Worker Protection (I.E. Procedure 82211)

Paragraphs 2.0 through 2.6 of EPIP 12.1, Reentry Procedures for Emergency Operations, outlines the steps necessary and the names of positions responsible for authorizing personnel exposures in excess of 10 CFR Part 20 limits. Chemistry and Health Physics Superintendents contacted appeared knowledgeable of the procedure as well as the need for the reasonable application of the ALARA philosophy during emergency operations.

A criteria for exceeding 10 CFR Part 20 limits has been established and is contained in EPIP 12.1. Individuals in that procedure, e.g., Health Physics Supervisor and Supervisor of Chemistry and Health Physics, who are named as having responsibility for authorizing exposures in excess of Part 20 limits, were both aware of the limits, their responsibilities and requirements contained in the procedure. Certain lower level supervisory personnel gave evidence of the need for additional training in the recommended emergency limits this procedure involved. Respiratory protective equipment is maintained in the TSC/OSC, ESC, SBCC, and the CR. Self Contained Breathing Apparatus (SCBAs) are maintained in all of the above areas except the SBCC, where only respirators and canisters are maintained. A check of the number of SCBA units in the TSC/OSC and the Chemistry and Health Physics (C/HP) check point appears adequate.

The quantities of anticontamination apparel and equipment located at the SBCC appears adequate for initial activation and early emergency response. Completed inventory checklists of anticontamination clothing and equipment maintained in the TSC/OSC and the CR indicate that adequate supplies are available for the use of initial response personnel.

Appropriate quantities of high range survey instruments and self reading dosimeters were available in the TSC/OSC, SBCC and the CR at the time of this inspection.

No shower facilities are available in the SBCC for decontamination. Several 10 gallon containers of water are available in this area for decontamination. However, this situation will be corrected when the current SBCC facility will be housed in the new ESC (EOF) being built nearby. The same applies to the current ESC. Two showers are located in the TSC/OSC (one in each of the restrooms). Assuming habitability of the C/HP control point, the shower facilities should be adequate. Adequate supplies of ropes, signs, and barrier markers as well as contamination materials is in storage at the TSC/OSC, SBCC, and the C/HP checkpoint. Containers for collection and control of contaminated clothing is also available in the above mentioned areas.

The C/HP department maintains a computerized dose program which can provide personnel exposure data by individual and by groups or department, assuming data on individual exposures are entered daily. This system should be able to provide 24 hour exposure results.

No special procedures have been established which would allow exposure in excess of Part 20 limits for off-site nonlicensee support personnel, e.g., ambulance and medical personnel and fire fighters. The current policy according to the Supervisor of Health Physics is that such offsite personnel will not be exposed in excess of Part 20 limits.

Onsite and offsite access control points have been established at the SBCC and TSC/OSC.

8. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item disclosed during this inspection is discussed in Section 7.i.

9. Exit Interview

The inspectors met with the licensee representatives denoted in Paragraph 1 at the conclusion of the inspection on July 22, 1983. The team leader summarized the scope and findings of the inspection.