

**NIAGARA
MOHAWK**

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Stanley W. Wilczek, Jr.
Vice President
Nuclear Support

November 14, 1991
NMPIL 0621

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63
TAC No. MB1713

Re: Nine Mile Point Unit 2
Docket No. 50-410
NPF-69
TAC No. MB1714

Gentlemen:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING NINE MILE POINT
NUCLEAR STATION'S EXEMPTION FROM ANNUAL EXERCISE REQUIREMENT OF
10 CFR PART 50, APPENDIX E, SECTION IV.F.2

The enclosure to this letter provides the information requested in your letter
of October 23, 1991 regarding Niagara Mohawk Power Corporation's request for
exemption from the annual exercise requirement of 10 CFR Part 50, Appendix E,
Section IV.F.2, for 1991 only.

If you require any further information regarding our application for
exemption, please contact me at (315) 428-7151.

Very truly yours,



S. W. Wilczek, Jr.
Vice President
Nuclear Support

NAS/mls
002085GG
Enclosure

cc: Mr. T. T. Martin, Regional Administrator, Region I
Mr. R. A. Capra, Project Director, NRR
Mr. D. S. Brinkman, Senior Project Manager, NRR
Mr. J. E. Menning, Project Manager, NRR
Mr. W. L. Schmidt, Senior Resident Inspector
Mr. D. R. Haverkamp, Chief, Reactor Projects Section No. 1B
Mr. E. C. McCabe, Chief, Emergency Preparedness Section,
Region 1
Mr. G. W. Brower, Director, Oswego County Emergency
Management Office
Mr. J. Baranski, Exercise Director, New York State Emergency
Management Office

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NIAGARA MOHAWK POWER CORPORATION'S
RESPONSE TO THE NUCLEAR REGULATORY
COMMISSION'S
REQUEST FOR ADDITIONAL INFORMATION CONCERNING
NINE MILE POINT NUCLEAR STATION'S
EXEMPTION FROM ANNUAL EXERCISE REQUIREMENT OF
10 CFR PART 50, APPENDIX E, SECTION IV.F.2

Request A. Provide a list of emergency preparedness drills conducted in 1991. If available, include for each drill a copy of the objectives and the report of the evaluation/critique that was conducted. In addition, include the status of any significant improvement items identified in these drills.

Response A. The following provides a response to information on drills conducted during 1991.

- 1) The UNIT 2 CASUALTY CONTROL DRILL was conducted on Feb. 26, 1991. A copy of the drill objectives, drill report and the status of open items is provided in Attachment A-1.
- 2) The first Quarter Fire Drills were conducted during the months of February and March for each Fire Department shift. The drill objectives and drill report are provided in Attachment A-2. There were no open items.
- 3) The second Quarter Fire Drills were conducted during the months of May and June for each Fire Department shift. The drill objectives are provided in Attachment A-2. The drill report is provided in Attachment A-3. There were no open items.
- 4) The third Quarter Fire Drills were conducted during the months of August and September for each Fire Department shift. The drill objectives are provided in Attachment A-2. The drill report is provided in Attachment A-4. There were no open items.
- 5) Communication drills conducted as required per site procedures to ensure the adequacy of the NMPC communications network. The applicable section of the procedure and completed checklist is provided in Attachment A-5.
- 6) The Site Emergency Accountability drill was conducted on April 30, 1991. A copy of the drill objectives, drill report and status of open items is provided in Attachment A-6.
- 7) The Annual Offsite Fire/ Offsite Medical/ Off-hours Notification drill was conducted on June 4, 1991. A copy of the drill objectives, drill report and status of open items is provided in Attachment A-7.
- 8) The UNIT 1 Practice Drill was conducted on August 1, 1991. A copy of the drill objectives, drill report and status of open items is provided in Attachment A-8.
- 9) The UNIT 1 Environmental Monitoring Drill was conducted on October 9, 1991. A copy of the drill objectives, drill report and status of open items is provided in Attachment A-9.
- 10) The Off-Hours Notification/Station Evacuation at Unit 1 was conducted during the week of Oct. 28, 1991. The drill report for the Off-Hours Notification drill conducted on October 29, 1991 has not yet been completed. The objectives are provided in Attachment A-10.

- 11) The On-site Medical Response Drill at Unit 2 was conducted on November 1, 1991. The drill report for the On-Site Medical Response drill conducted on November 1, 1991 has not yet been completed. The objectives are provided in Attachment A-11.

Request B. For the last five (1986 through 1990) NRC-evaluated annual exercises at Nine Mile Point Nuclear Station, identify when each of the five-year elements listed in NRC Inspection Procedure 82302 was demonstrated. For those elements not demonstrated within the last five years, provide a proposed schedule for demonstration.

Response B. The following provides when each of the five-year elements listed in NRC Inspection Procedure 82302 was conducted.

NRC Inspection Manual Inspection Procedure 82302	DATE CONDUCTED
(a) Off-hours Staffing (6 p.m. to 4 a.m.)	Not demonstrated during an annual exercise. NMPC has demonstrated this during the 5/30/90 Off-hours Notification response and Emergency Response staffing drill.
(b) Activation of emergency news center	Demonstrated on 10/29/86, 8/26/87, 8/2/88, 5/16/89, and 10/2/90. Additionally, it was demonstrated during the 8/1/91 drill and the 8/13/91 Site Area Emergency.
(c) Use of fire control teams	Demonstrated on 10/29/86, 8/2/88 and 10/2/90. Additionally, it was demonstrated during the 2/26/91 Drill and the 8/13/91 Site Area Emergency.
(d) Use of first aid and/or rescue teams	Demonstrated on 10/29/86 and 8/2/88, and also during the 10/17/90 Medical drill.
(e) Use of medical support personnel	Not demonstrated during an annual exercise. Demonstrated each year during the annual medical response drills (last conducted on 6/4/91 and 10/17/90 Medical drill).
(f) Use of licensee's headquarters support personnel	Demonstrated on 10/29/86, 8/26/87, 8/2/88, 5/16/89, and 10/2/90. Additionally, it was demonstrated during the 8/1/91 Drill and the 8/13/91 Site Area Emergency.
(g) Use of security personnel to provide prompt access for emergency equipment and support	Security has participated in the 10/29/86, 8/26/87, 8/2/88, 5/16/89 and the 10/2/90 annual exercises. Additionally, security demonstrated their support during the 4/4/91 Offsite Fire and Offsite Medical response drill.

NRC Inspection Manual Inspection Procedure 82302	DATE CONDUCTED
(h) Use of backup communications	The backup communications systems are tested as a surveillance per EFMP-2.
(i) Rumor Control	Demonstrated on 10/29/86, 8/26/87, 8/2/88, 5/26/89, and 10/2/90. Additionally demonstrated during the 8/1/91 Drill and the 8/13/91 Site Area Emergency.
(j) Use of emergency power	Not demonstrated during annual exercise. This element would have little or not effect on operation of the Emergency Response Facilities as the backup power supplies provide for 100% load carrying capability.
(k) Evacuation of Emergency Response Facilities (ERF's) and relocation to backup ERF's, where applicable	Not demonstrated during an annual exercise. Emergency response training was conducted in the backup Emergency Response Facilities in 1987.
(l) Ingestion pathway exercise	This State/Local government objective has been tentatively scheduled to be conducted in 1993.
(m) Field monitoring, including soil, vegetation, and water sampling	Demonstrated on 10/29/86, 8/26/87, and 8/2/88. Additionally, this was demonstrated during the 8/13/91 Site Area Emergency and performed on 10/9/91.
(n) Capability for determining the magnitude and impact of the particular components of a release	Demonstrated on 10/29/86, 8/26/87, 5/16/89, and 10/2/90. Additionally, it was demonstrated during the 8/13/91 Site Area Emergency.
(o) Same as (n)	Demonstrated on 10/29/86, 8/26/87, 5/16/89, and 10/2/90. Additionally, it was demonstrated during the 8/13/91 Site Area Emergency.
(p) Capability for post-accident coolant sampling and analysis	Demonstrated on 10/29/86, 8/26/87, and 10/2/90. Additionally, demonstrated during the 8/1/91 Drill.
(q) Use of potassium iodide	Demonstrated on 10/29/86, 8/26/87, 8/2/88, and 5/16/89.
(r) Assembly and accountability	Demonstrated on 10/29/86, 8/26/87, and 8/2/88. Additionally, it was demonstrated during the 8/1/91 Drill, the 8/13/91 Site Area Emergency and the 10/29/91 Drill.

MRC Inspection Manual Inspection Procedure 82302	DATE CONDUCTED
(a) Recovery and Re-entry	Demonstrated on 10/29/86, 8/26/87, 8/2/88 and 5/16/89. Additionally, it was demonstrated during the 8/1/91 Drill and the 8/13/91 Site Area Emergency.

Request C: With regard to the events on August 13, 1991, provide information which details the extent of the following emergency response activities:

- Corporate Emergency Operations Center activation and operation.
- Exposure Control, particularly with respect to teams dispatched from the Operations Support Center to perform inplant tasks.
- Station Evacuation.

Response C: As requested, with regard to the August 13, 1991 events the following information is provided:

- The NMPC Corporate Emergency Operations Center was fully staffed and operational, ready to perform its emergency functions by 0830 hours on the morning of August 13, 1991.
- NMPC provided the appropriate response in the area of exposure control efforts during the Site Area Emergency as can be seen from the logs from the Station Survey Sample Team Coordinator (SSSTC) Attachment C. All damage control teams were sent out with appropriate Radiation Protection (RP) Technician coverage, appropriate surveys were completed as were any required samples, and all data was analyzed for abnormal indications. Additionally, it can be noted from these logs that downwind surveys were also performed as appropriate, samples were obtained and data was analyzed.
- A station evacuation was conducted during the 8/13/91 Site Area Emergency although the start time for beginning the actual accountability process was untimely. Following commencement of the Accountability Process, all personnel listed as missing initially were subsequently found using station procedures for search and rescue. All personnel were then continuously tracked and accountability maintained during the remainder of the event.

Request D. Provide a copy of any available documentation (e.g., record of conversation, memorandum, or letter) from the State of New York or Oswego County officials which indicates their concurrence with the Niagara Mohawk Power Corporation request for an exemption from the annual exercise requirement.

Response D. Regarding concurrence of the exemption request, NMPC officials conversed with New York State and Local Officials concerning the possibility of requesting an exemption from conducting the Annual Exercise. Documentation of these conversations is provided in Attachment D.

Nine Mile Point Unit 2
Emergency Preparedness Drill
Scenario No. 20, Rev. 0

1.0 OBJECTIVES

This drill scenario is designed to develop and maintain the skills of the emergency response organization and test those portions of the emergency plan delineated below. The scope of this drill will include the classification of emergency events up to and including a Site Area Emergency with a small release offsite having no significant radiological consequences to the general public. It conforms to the guidance contained in NRC Information Notice No. 87-54 "Emergency Response Exercises" and NRC Information Notice No. 89-46 on confidentiality of scenarios.

This section contains the objectives which Niagara Mohawk Power Corporation (NMPC), will demonstrate during the conduct of this drill.

1.1 Objectives

A. Radiological Emergency Preparedness Plan

1. Evaluate the adequacy and implementation of radiological emergency preparedness plans for Nine Mile Point Nuclear Station.
2. Demonstrate the emergency response capabilities of NMPNS.
3. Demonstrate the capability of NMPNS to implement its radiological emergency preparedness plan in a manner satisfying NRC acceptance criteria.

B. Notification Procedures

1. Demonstrate the ability of NMPNS staff to classify actual or potential emergencies as:
 - Unusual Event
 - Alert
 - Site Area Emergencyin accordance with Nine Mile Point Emergency Plan Procedure.
2. Demonstrate the capability of NMPNS to communicate with the Nuclear Regulatory Commission via the NRC hot-line.
 - This is to be simulated

3. Demonstrate the capability of NMPNS to notify and activate emergency response personnel in accordance with established emergency response procedures.
4. Demonstrate, as appropriate, the capability of NMPNS to notify State, Local and Federal Agencies in accordance with Federal guidance and established response procedure.

- This is to be simulated

C. Emergency Communication

1. Demonstrate that adequate NMPNS voice and data communications capabilities exist among the Unit 2 Control Room, Technical Support Center, Emergency Operations Facility, Operations Support Center, Corporate Emergency Operations Center and the Joint News Center, and the ability to maintain communications with governmental agencies as appropriate.
2. Demonstrate the ability to alert station personnel of emergency conditions by the use of emergency alarms and announcements.
3. Demonstrate the ability of NMPNS to coordinate, control and deploy radiological field monitoring teams and damage control teams via its field communications systems.

D. NMPNS Emergency Response Facilities

1. Demonstrate the activation, adequacy of staffing, equipment and set-up as appropriate of emergency response facilities, as well as the adequacy of space and habitability for radiological emergency management at:
 - NMPNS Control Room (Unit No. 2).
 - NMPNS Technical Support Center.
 - NMPNS Operations Support Center.
 - NMPNS Emergency Operations Facility, and
 - Corporate Emergency Operations Center.

2. Demonstrate access control and security, as stated in procedures, at appropriate emergency response facilities.
3. Assess the ability to maintain proper documentation and record control (i.e., status boards, logs, and forms).

E. Direction and Control

1. Demonstrate the ability of key emergency personnel to initiate, coordinate, and make decisions in a timely manner during a radiological emergency and clearly demonstrate "who is in charge".
2. Demonstrate the existence of organizational direction and control.
3. Demonstrate the ability to provide for 24 hour staffing as appropriate. This may be demonstrated with the development of staffing roster(s).

F. Public Information

NOTE: The Joint News Center will be pre-staged with partial participation to support Public Information objective demonstrations in the CR, TSC and EOF.

1. Demonstrate adequate staffing of the Joint News Center.
Not an objective of this drill.
2. Demonstrate the ability of Joint News Center personnel to address rumors and issue periodic public information releases.
Not an objective of this drill.
3. Demonstrate that NMPC can provide technical information to the media regarding a radiological emergency in a timely manner.
4. Demonstrate the ability of NMPC to issue communications as requested to the investment community.
Not an objective of this drill.

5. Demonstrate the ability of NMPC to disseminate communications to NMPC employees from the PACC office in Syracuse.

Not an objective of this drill.

6. Demonstrate the timely issuance of news releases.

G. Accident Assessment and Evaluation

1. Demonstrate the ability of the NMPNS field monitoring teams to collect airborne radiiodine samples and to collect surface contamination level readings/measurements.
2. Demonstrate the ability of NMPNS to utilize field teams to collect radiological data in accordance with its respective radiological emergency procedures.
3. Demonstrate the ability of NMPNS to calculate dose projections as appropriate and to determine appropriate protective action recommendations.

H. Protective Response

1. Demonstrate the decision making process of NMPC to recommend appropriate protective actions.
2. Demonstrate a Station Evacuation can be conducted.
3. Demonstrate the capability to initially account for all individuals within the protected areas at the appropriate time during the drill and obtain the names of "missing" individual within approximately 30 minutes of the start of the accountability process.
4. Demonstrate the ability of NMPNS personnel to maintain accountability in accordance with appropriate NMPC Emergency Plan Procedures.

I. Radiological Exposure Control

1. Demonstrate the decision process for limiting exposures to emergency workers.
2. Demonstrate the record keeping of radiation exposures and use of dosimetry for emergency workers.

3. Demonstrate emergency workers knowledge of dosimetry and protective equipment.
4. Demonstrate assessment of TSC, OSC, EOF and Control Room habitability.

J. Post Accident Sampling System

1. Demonstrate the ability to safely operate the Post Accident Sampling System.

K. Damage Control

1. Demonstrate the decision making process leading to appropriate inplant corrective actions, taking into account exposure to radiation, temperature and other relevant factors.
2. Demonstrate the capability of NMPC damage control teams to locate and obtain the materials required to effect repairs to postulated equipment failures in a timely manner.
3. Demonstrate the capability to dispatch Damage Control teams into the field in a timely manner.
4. Demonstrate the ability of Damage Control teams to mitigate the consequences of the accident through Damage Control.

L. Emergency Preparedness Training

1. Provide training and test Niagara Mohawk Power Corporation emergency response personnel in their respective emergency functions through active participation in this drill.

M. Recovery

1. Demonstrate the capability of NMPC emergency response personnel to identify constraints to entering recovery.

1.2 Previously Identified Deficiencies/Areas Requiring Improvement

A. Unit 2 Deficiencies

1. NCTS #003197-03, Task #01
The process to dispatch a damage control team should be streamlined.
2. NCTS #502689-00, Task #02
Responsibility for the coordination of the damage repair and Rad monitoring teams was not clear among the operators.
3. NCTS #502722-00, Task #01
Damage control teams experienced delays in dispatch from the OSC.

B. Station Deficiencies

1. NCTS #003093-12, Task #20
Alternate drill players who have participated in this drill expressed a concern that all other alternates have not had the same opportunity of participating in a drill.
2. NCTS #50277-00, Tack #03
Delays in activation of the EOF persist.

NIAGARA MOHAWK POWER CORPORATION

Report of the February 26, 1991 Emergency Preparedness Casualty Control Drill Conducted at Nine Mile Point Nuclear Station - Unit 2

EXECUTIVE SUMMARY

On February 26, 1991 the Emergency Preparedness branch conducted a casualty control drill to evaluate the emergency response organization and certain portions of the Nine Mile Point Nuclear Station Site Emergency Plan and Implementing Procedures. This drill was observed by representatives from the Institute of Nuclear Power Operations (INPO) and a QA audit team.

The general assessment of the drill activities by the players, observers, and controllers was favorable and the overall response was rated as satisfactory. At the drill critique and INPO Exit Meeting, NMPC and INPO identified several opportunities for improvement. These, along with strengths are noted in the following report by facility. Additionally, general strengths and opportunities for improvement have been included in this report. Most notable strengths were communications throughout all ERF's and the Emergency Preparedness training effectiveness. The notable opportunities for improvement were the untimely dispatching of Damage Repair Teams noted by INPO as an industry wide concern, and several drill player performance problems. A note of importance is that one drill objective was not met due to missing the fifteen minute notification requirement, performing all objectives is a Business Plan Item.

DRILL DESCRIPTION

The scope of this drill included classification of emergency action levels up to and including a Site Area Emergency with an off-site radiological release. In addition to Control Room operations, the activation and operation of the Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operations Facility (EOF), Corporate Emergency Operations Center, and the minimum staffing of the Joint News Center (JNC) were observed. Other areas specifically observed during this drill included post-accident sampling, and radiological assessment.

SCENARIO DISCUSSION

Following a simulated recent refueling, a postulated failure of fuel elements caused by a manufacturing deficiency of the fuel occurs, requiring a plant shutdown per by Technical Specifications. An explosion caused by a leak of hydrogen from the main generator occurs next resulting in a reactor scram. Subsequent failures

in the Power Distribution System result in a loss of AC power and necessitate the use of RCIC for reactor pressure and level control. Following a loss of vacuum caused by the loss of offsite power, one set of MSIV's fail to isolate. Additionally, as the scenario progresses, a rupture occurs in the steam line feeding the RCIC system which subsequently fails to isolate leading to an unisolable steam leak outside primary containment. A controlled low level radioactive release is then initiated via the Standby Gas Treatment system which has been operating since the LOOP. A full copy of the scenario for this drill is available in the Nine Mile Point Nuclear Station files for review and future reference.

This drill was observed by INPO and NMPC observers and controllers situated in various ERFs and other locations throughout the station in order to better evaluate and comment on the actions of response personnel.

GENERAL STRENGTHS NOTED

Several individuals were noted during this drill as performing their duties in an exemplary fashion and should be recognized. These individuals and their performance are as listed below:

- Brian Moore Continually acted in a professional, inquisitive, proactive manner while continually determining ways to mitigate the causes and effects of the drill.
- Ray Pasternak Added a calm, coordinated, managerial style to the CED position while performing management by walking around (MBWA) to maintain an overall picture of the drill.
- Joe Kirkpatrick Exhibited a most helpful attitude during the work prior to the drill. Continually provided invaluable assistance in developing the necessary mockups and input from the Maintenance Department.

STRENGTHS AND OPPORTUNITIES FOR IMPROVEMENT BY FACILITY

Unit 2 Control Room

Control Room personnel responded to the drill with good command and control, good communications and appropriate personnel protective measures.

STRENGTHS

1. The SSS exhibited good command and control and communication by continually updating the onshift operators and the TSC.
2. The shift took appropriate measures to assure personnel safety and mitigate the causes/effects of the accident.

Opportunities for Improvement:

1. No significant areas noted.

Operations Support Center

Personnel in the OSC communicated well, used good survey techniques and interacted with actual plant operations well. However, concerns still exist with present OSC configuration, timely dispatch of Damage Repair Teams and communications with other groups.

STRENGTHS

1. Damage Repair Teams had good survey techniques, kept good records, communicated well, and took necessary precautions to avoid interfering with actual plant operations.

Opportunities for Improvement:

1. The present location of the OSC should be reevaluated and a permanent OSC established. This would help to eliminate continuing concerns over:
 - Setup of the OSC.
 - Communications.
 - Ability to timely dispatch Damage Repair Teams.
 - Ability to determine exposure deltas and respiratory status.

2. The effort to discontinue providing the OSC with a Communications Coordinator will be abandoned. The Communications Coordinator would have been able to clear up several of the communications difficulties.
3. The use of a debriefing checklist for Damage Repair Teams would provide other Damage Repair Teams and OSC staff with an insight as to conditions existing in the plant. This checklist is currently in the development stage.

Technical Support Center

Personnel in the TSC used good teamwork while prioritizing necessary Damage Repair activities. The 15-minute notification following the declaration of the General Emergency was not met and additionally, easier methods need to be established for determining respiratory status and exposure deltas.

STRENGTHS

1. Good communication, teamwork and briefings were observed in the TSC.
2. SED prioritized Damage Repair activities appropriately.
3. The RAM provided excellent updates to the SED.

Opportunities for Improvement:

1. Status boards should be updated more frequently, provided with a priority column for damage repair activities and contain unit specific data.
2. An easier method for obtaining up-to-date exposure deltas and respiratory qualification status should be determined.
3. Team training with the entire TSC staff performed in the TSC via the use of a "table top" scenario would be beneficial in ensuring that the TSC reacts to events as a uniform, cohesive organization.
4. A "count down" timer has been used in the past to assist the SED in making the 15-minute notification time. This practice should be reestablished.

5. EAP-1 does not provide clear guidance as to who directs the activities of plant personnel following activation of the TSC. EAP-1 is being revised to make it clear that prior to TSC staffing the Control Room (SED) should initially control/track inplant personnel. Following turnover to the SED in the TSC this information and control will then be performed/tracked by the TSC.

Emergency Operations Facility

The CED, although new to the position, reacted very well to the scenario. Several hardware deficiencies challenged the team in the EOF and were responded to adequately.

STRENGTHS

1. The CED exhibited excellent command and control, conducted MBWA during drill.
2. The dose assessment staff used alternate methods for information when dose assessment computer went down.

Opportunities for Improvement:

1. The process computer continues to be only sporadically operational. The Emergency Preparedness branch is investigating the cause and will report on necessary corrective action.
2. Additional head sets are being requisitioned for the Technical Assessment area to assist in the rapid communication of plant status.
3. The Class A model for the dose assessment computer does not handle more than 1 set of inputs from the meteorological towers. A precaution is being added to EPP-8 to inform personnel that only 1 meteorological tower data should be used.
4. Deficiencies dealing with the status of updates to the latest revision of the Unit 2 EOP's and the nature of the mounting of these procedures to plexiglass existed in the EOF. These have been corrected.

Joint News Center

STRENGTHS

1. The initial news release was very timely due to quick review and approval by the SSS/SED.

Opportunities for Improvement:

1. No significant areas noted.

Corporate Emergency Operations Center

STRENGTHS

1. No significant areas noted.

Opportunities for Improvement:

1. No significant areas noted.

General Opportunities for Improvement:

1. Drill data deficiencies noted by several individuals in different ERF's led to varying degrees of confusion. These deficiencies point out the need for improved cooperation between Emergency Preparedness and all departments involved in scenario development. Several deficiencies were pointed out by departments within one week of the drill. The Emergency Preparedness branch acknowledges these, however, these cannot be corrected within such a short time period. More timely input is necessary.
2. The present Gaitronics system deficiencies continue to hamper effective communications in the following manners:
 - a. PA announcements are not heard in several areas of the site.
 - b. Unit 2 announcements are unavailable in CSC.
 - c. TSC presently has one handset from which Unit 2 announcements are heard.
 - d. Due to the low volume of the announcement systems and the inherent noise level in the ERF's, the announcements do not command attention.

The complex nature of the Gaitronics problems will require several different modifications, work requests, and hardware changes to correct all noted deficiencies. A Lead Engineer has been assigned to this task to determine all necessary corrective actions.

3. During the course of the drill, several individuals were noted performing tasks for which they were not qualified or their qualification had lapsed.
4. It was noted by INPO that there exists a general misunderstanding of the terms; fission product barrier and clad failure. The revision to EAP-2, presently in the review process, should alleviate this concern.
5. Training for controllers/observers used for emergency drills should be developed which details:
 - Duties/Responsibilities
 - Expectations
 - When and When Not to Prompt
 - Objectives
 - Exercise/Drill Outline

A Training Review Request (TRR) has been issued requesting this training.

6. More time and effort needs to be expended by the Scenario Development Committee members to ensure that mockups are used and are realistic in appearance, enhance performance during the drill, and are placed close to the true location of implant equipment.
7. A more complete and detailed schedule needs to be developed which delineates the times that each controller/observer needs to arrive at each facility/location. This will be addressed in the next exercise/drill.
8. Use of the simulators for emergency exercises/drills will; enhance the scenario's realism, minimize impact on actual plant operations, minimize the amount of data that must be simulated/provided and overall improve drill response. This is being investigated and a project plan is beginning to be developed.
9. Repeat and significant new action items have been addressed through the Nuclear Compliance Tracking System (NCTS) as identified in Attachment (1).

FACILITY DEBRIEFINGS AND CRITIQUE

Immediately following the drill, debriefings were held in each facility to identify preliminary drill findings and observations. Both drill control and response personnel were asked to participate in these facility debriefings. On Wednesday, February 27, 1991, a formal critique was held to detail significant comments from the drill, with all controllers/observers, QA, INPO and other interested parties. On the morning of Friday, March 1, 1991, the Emergency Preparedness branch, INPO met to discuss observations made by the INPO team. These observations were then reiterated at an Exit Meeting held with Niagara Mohawk Power Corporation Senior Management in the afternoon of Friday, March 1, 1991.

SUMMARY

This drill has been determined to be a success in that all objectives were accomplished with one exception. This drill was used as a training vehicle to enhance the NMPNS Emergency Response Organization's skills in handling plant casualties. The one noted exception dealt with exceeding the 15-minute notification requirement and has been thoroughly discussed in all Post-Drill Critiques and this report.

Submitted by: J. Kaminski Date: 4/1/91
J. Kaminski
Program Director Drills and Exercises

Approved by: A. M. Salemi Date: 4/2/91
A. M. Salemi
Director Emergency Preparedness

Attachment:

- (1) NCTS Items Identified During February 26, 1991, Casualty Control Drill.
- (2) Emergency Preparedness Drill Scenario #20 Vols. 1 & 2.

Attachment 1

NIAGARA MOHAWK POWER CORPORATION

Report of the February 26, 1991
Casualty Control Drill
Conducted at Nine Mile Point
Nuclear Station - Unit 2

NCTS COMMENTS

Attachment 2

NIAGARA MOHAWK POWER CORPORATION

Report of the February 26, 1991
Casualty Control Drill
Conducted at Nine Mile Point
Nuclear Station - Unit 2

Emergency Preparedness Drill Scenario #20 - Vols. 1 & 2

Due to space limitations, these volumes are not included with this report. They are available for review and reference from the Emergency Preparedness Department. For more information contact either John Kaminski at 349-4823 or Joanne Benson at 349-4531.

Type Unit	Due				TASK INFORMATION		
Agency	Event		Prog MGR				DUE DATE
Source	Variance	NCTS-ID	Commit MGR	Manager			STATUS
		COMMITMENT	Commit Group	Group	ID#	DESCRIPTION	STAT DATE
		DESCRIPTION	Buy-in	Individual			
I 2	31DEC91	700193-00	SALEMI	SALEMI	10	THE DOWNWIND SURVEY	28MAR91
NMPC		THE PRELIMINARY RESULTS OF THE	SALEMI	EMER-PREP		TEAM WAS UNFAMILIAR	CLOSED
		FEBRUARY 26 1991 UNIT 2 DRILL	EMER-PREP	KAMINSKI		WITH SURVEY LOCATION	12NOV91
EP		IDENTIFY CONCERNS WHICH SHOULD BE	Y			R-3 ON ENVIRON.	
	19MAR91	ADDRESSED. THESE CONCERNS ARE				SURVEY MAP #7. A TRR	
		IDENTIFIED IN THE ATTACHED.				WAS ISSUED TO	
						TRAINING TO STRESS	
						THE USE OF THIS MAP	
						IN TRAINING.	
				SALEMI	08	EDP FLOWCHARTS IN THE	29MAR91
				EMER-PREP		EDP STILL WERE	CLOSED
				HOWES		REVISION 3. ALL	12NOV91
						REVISION 3 EDP	
						FLOWCHARTS IN THE EDP	
						HAVE BEEN CHANGED OUT	
						AND THIS TASK CAN BE	
						CONSIDERED CLOSED.	
				SALEMI	06	THE SED MISSED THE	01APR91
				EMER-PREP		FIFTEEN MINUTE	CLOSED
				KAMINSKI		NOTIFICATION ON THE	12NOV91
						GENERAL EMERGENCY.	
						THIS WAS ATTRIBUTED	
						TO NEW SED AND	
						DEFICIENCIES IN	
						EAP-2. THIS WAS	
						DISCUSSED AT THE POST	
						DRILL CRITIQUE AND	
						CAN BE CONSIDERED	
						CLOSED WITH NEW REV	
						TO EAP-2 DUE TO BE	
						FINAL 3-29-91.	

Type Unit	Due		TASK INFORMATION				
Agency	Event		Prog MGR			DUE DATE	
Source	Variance	NCTS-ID	Commit MGR	Manager		STATUS	
		COMMITMENT	Commit Group	Group	ID#	DESCRIPTION	STAT DATE
		DESCRIPTION	Buy-in	Individual			
			SALEMI	01	EMERGENCY	01APR91	
			EMER-PREP		PREPAREDNESS TO	CLOSED	
			HOWES		SUBMIT A FACILITY	12NOV91	
					REQUEST FOR A		
					DEDICATED OSC. MANY		
					COMMENTS WERE		
					RECEIVED CONCERNING		
					THE INADEQUACIES OF		
					THE CURRENT OSC.		
			SALEMI	04	THERE WAS A GENERAL	15APR91	
			EMER-PREP		MISUNDERSTANDING OF	CLOSED	
			HARTNETT		THE THREE FISSON	12NOV91	
					PRODUCT BARRIERS.		
					THIS WILL BE		
					CORRECTED WITH THE		
					NEW REVISION TO EAP-2		
					DUE TO BE FINAL		
					3-29-91.		
			SALEMI	07	THE PROCESS COMPUTER	31JUL91	
			EMER-PREP		IN THE EDF WAS	INPROGRESS	
			HOWES		INOPERATIVE DURING	27MAR91	
					THE DRILL. EMERGENCY		
					PREPAREDNESS TO		
					EVALUATE CAUSE AND		
					REPORT ON CORRECTIVE		
					ACTIONS.		
			SALEMI	09	IT WAS DETERMINED	30AUG91	
			EMER-PREP		THAT THE DATA GIVEN	CLOSED	
			KAMINSKI		THE DOSE ASSESSMENT	12NOV91	
					ADVISOR WAS IN RAGEMS		
					FORMAT NOT GEMS. THIS		
					TASK WAS IDENTIFIED		
					AS A DATA DEFICIENCY		
					AND WILL BE CORRECTED		
					IN THE NEXT SCENARIO		
					DEVELOPMENT.		

Type Unit	Due	TASK INFORMATION				
Agency	Event	Prog MGR	Manager	DUE DATE		
Source	Variance	Commit MGR	Group	STATUS		
	NCTS-ID	Commit Group	Individual	ID##	DESCRIPTION	STAT DATE
	COMMITMENT	Buy-in				
	DESCRIPTION					
		SALEMI	03	DATA DISCREPENCIES	30AUG91	
		EMER-PREP		WERE IDENTIFIED IN	CLOSED	
		KAMINSKI		THE SCENARIO DURING	12NOV91	
				THE NEXT SCENARIO		
				DEVELOPMENT PROCESS		
				E.P. WILL CORRECT AND		
				ENSURE THE		
				DISCREPENCIES NOTED		
				RE NOT REPEATED.		
		SALEMI	02	IT WAS NOTED THAT A	30AUG91	
		EMER-PREP		CONTROLLER SCHEDULE	CLOSED	
		KAMINSKI		OF EVENTS NEEDS TO BE	12NOV91	
				DEVELOPED FOR		
				CONTROLLERS USE. THIS		
				WILL ELIMINATE THE		
				CONFUSION ENCOUNTERED		
				BY CONTROLLERS DURING		
				THIS DRILL.		
		SALEMI	11	UNTIMELY DISPATCH OF	31OCT91	
		EMER-PREP		DAMAGE CONTROL TEAMS	INPROGRESS	
		SHELLING		CONTINUES. EP TO	27MAR91	
				DEVELOP A TIMELY		
				PROCESS AND REVISE		
				PROCEDURES		
				ACCORDINGLY		
		SALEMI	14	EP NEEDS TO MORE	31DEC91	
		EMER-PREP		CLOSELY MONITOR	INPROGRESS	
		KAMINSKI		ACCESS TO EP DRILL	27MAR91	
				SCENARIOS. THIS WILL		
				BE EVALUATED		
				THROUGHOUT 1991 FOR		
				EFFECTIVE RESULTS.		

Type Unit	Due				TASK INFORMATION		
Agency	Event		Prog MGR	Manager		DUE DATE	
Source	Variance	NCTS-ID	Commit MGR	Group	ID##	DESCRIPTION	STATUS
		COMMITMENT	Commit Group	Individual			STAT DATE
		DESCRIPTION	Buy-in				
				SALEMI	13	THE QUALITY AND EXTENT TO WHICH MARK-UPS ARE USED DURING DRILLS NEEDS TO BE IMPROVED. THIS TASK SHOULD SHOW IMPROVING TRENDS OVER THE NEXT YEAR.	31DEC91 INPROGRESS 27MAR91
				EMER-PREP KAMINSKI			
				SALEMI	12	IT WAS RECOMMENDED THAT EP CONSIDER USING THE SIMULATORS FOR DRILLS AND NOT INTERFERE WITH ACTUAL CONTROL ROOM OPERATIONS. EP TO PROVIDE FUNDING IN 1991.	31DEC91 CLOSED 12NOV91
				EMER-PREP KAMINSKI			
				SALEMI	05	E.P. NEEDS TO REVISE PROCEDURES EAP-1 AND EPP-22 TO PROVIDE CLEAR GUIDANCE ON WHERE OPERATORS ARE CONTROLLED FROM AFTER THE TSC IS MANNED AND IN CONTROL.	31DEC91 INPROGRESS 27MAR91
				EMER-PREP HARTN T			

TOTAL COMMITMENTS 1
TOTAL TASKS 14

Scope of Fire Training Drills to be Conducted During 1989 (Same as 1991)

1. Scope sufficient to meet requirements of 10CFR50, Appendix R, III.I.3.b (quarterly fire drills)
2. NMPNS Unit #1 Fire Department Response
3. NMPNS Unit #1 Licensed Nuclear Operator Response
4. NMPNS Unit #1 Radiation Protection Technical Response
5. NMPNS Unit #1 CSO for Internal Communication Only
6. Security Officer Response to Fire Scene
7. Response by Reserve Fire Brigade (if available)
8. Various Location(s) as indicated by Drill Scenario
9. Drill(s) may be conducted at any time upon prior approval of the Unit 2 SSs and other restrictions as may be stated in scenarios.

NINE MILE POINT NUCLEAR STATION
UNIT I
FIRE TRAINING DRILL SERIES 1-89.00

I. OBJECTIVES/SCOPE

A. Objectives

This series of drills is designed to test the ability of the NMPNS Unit I Fire Department to effectively respond to and extinguish a fire per EPP-2. These drills will also test the communication coordination that is required between the Fire Department, the Security Department, the Operations Department and the Radiation Protection Department to insure and maintain safe operation of NMPNS Unit I.

B. Scope

1. This series of fire drills provides a "drill bank" from which randomly selected drill may be chosen to fulfill the quarterly fire drill requirements of 10CFR50 Appendix R Sect. III, I, 3.b.
2. At the beginning of each calendar quarter the Generation Specialist for Fire Training, in conjunction with the Site Supervisor Fire Protection Nuclear will select five (5) scenarios to be used during that quarter. This method ensures that each shift of the NMPNS Unit I Fire Department will participate in a different drill scenario.

II. DATES, PARTICIPATING ORGANIZATION AND SCENARIO INDEX

A. Dates

This series of drills to be implemented during the 1989 calendar year.

B. Participating Organization

Those expected to participate in the drill may include, but are not limited to the following:

1. NMPNS Unit #1 Fire Department
2. NMPNS Unit #1 Licensed Nuclear Operator
3. CSO (internal communications only)
4. Security Officer detailed to Fire Scene
5. Reserve Fire Brigade (if available)
6. Radiation Protection

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION UNIT @

Scope of Fire Training Drills to be Conducted During 1989

1. Scope sufficient to meet requirements of 10CFR50, Appendix R, III.I.3.b (quarterly fire drills)
2. NMPNS Unit #2 Fire Department Response
3. NMPNS Unit #2 Licensed Nuclear Operator Response
4. NMPNS Unit #2 Radiation Protection Technical Response
5. NMPNS Unit #2 CSO for Internal Communication Only
6. Security Officer Response to Fire Scene
7. Response by Reserve Fire Brigade (if available)
8. Various Location(s) as indicated by Drill Scenario
9. Drill(s) may be conducted at any time upon prior approval of the Unit 2 SSS and other restrictions as may be stated in scenarios.

- * These signatures denote Niagara Mohawk Power Corporations approval to commit appropriate resources to perform this Emergency Preparedness Drill. Since these individuals may be drill players, they have not been allowed to view the material contained in this scenario. The scope of this drill is denoted ~~on the next sheet, above.~~

MASTER

NINE MILE POINT NUCLEAR STATION
UNIT 2
FIRE TRAINING DRILL SERIES 2-89.00

I. OBJECTIVES/SCOPE

A. Objectives

This series of drills is designed to test the ability of the NMPNS Unit 2 Fire Department to effectively respond to and extinguish a fire per EPP-2. These drills will also test the communication coordination that is required between the Fire Department, the Security Department, the Operations Department and the Radiation Protection Department to insure and maintain safe operation of NMPNS Unit 2.

B. Scope

1. This series of fire drills provides a "drill bank" from which a randomly selected drill may be chosen to fulfill the quarterly fire drill requirements of 10CFR50 Appendix R, III.I.3.b.
2. At the beginning of each calendar quarter the Generation Specialist for Fire Training, in conjunction with the Site Supervisor Fire Protection Nuclear, will select five (5) scenarios to be used during that quarter. This method ensures that each shift of the NMPNS Unit 2 Fire Department will participate in a different drill scenario.

II. DATES, PARTICIPATING ORGANIZATION AND SCENARIO INDEX

A. Dates

This series of drills to be implemented during the 1989 calendar year.

B. Participating Organization

Those expected to participate in the drill may include, but are not limited to the following:

1. NMPNS Unit #2 Fire Department
2. NMPNS Unit #2 Licensed Nuclear Operator
3. CSO (internal communications only)
4. Security Officer detailed to Fire Scene
5. Reserve Fire Brigade (if available)
6. Radiation Protection

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION
UNIT 2
FIRE DRILL REPORT
1 2 3 4 QUARTER 19

- 1.0 Summary (Also see the attached Summary Table)
Fire Drills were conducted to test the ability of the Nine Mile Point Unit 2 Fire Department to respond to and extinguish various fires. These are required quarterly drills per the provision of 10-CFR-50 Appendix R, Section III, para. 3b.

Also tested was the communications coordination that is required between the Fire Department, the Security Department, the Operations Department and the Radiation Protection Department to ensure and maintain safe operation of NMPNS Unit 2.

Attachment 2 to this report contains drill scenarios that were used during the performance of the drills. It also contains all the drill data sheets, observers notes, etc.

- 2.0 Deficiencies/Recommendations
Drill deficiencies and recommendations are indicated on the Individual Exercise/Drill Deficiency/Comment Sheets which can be found as Attachment 1 to this report.

- 3.0 Performance (Identify as Applicable)
- Drill performance satisfactory scenarios, no action required.
 - Drill performance satisfactory, minor deficiencies in one or more drills; corrective action required.
 - 1 personnel actions needing attention
 - 3 equipment deficiencies/failures
 - 2 procedural deficiencies
 - 0 other
- At least one drill unsatisfactory: Drill(s) have been repeated within 30 days for shift(s) _____.

Submitted by: _____

Generation Specialist
Fire Training

Date: _____

4/12/91

March 1988

Year: 1991

Quarter: Q2 3

MINE HILL FOHRM. UNIT I
SUMMARY TABLE

SHIFT*	DRILL NO.	DESCRIPTION	DATE	TIME	TYPE**	DEFICIENCY NOTED	DEFICIENCY DELETED
A	1-89.03	R55B Elec. Rm. B. 244	2/13/91	0510	U	— None	—
D	1-89.05	PB102	2/20/91	0500	U	— None	—
C	1-89.01	Control Space Room	2/27/91	0500	U	— None	—
E	1-89.04	Diesel Generator 103	3/6/91	0500	U	— None	—
B	1-89.02	Turbine Generator Bent. 6	3/17/91	0900	U	— None	—

* IDENTIFY UNSATISFACTORY DRILL PERFORMANCE
BY SHIFT AND DATES PERM AS APPLICABLE (30 DAYS)

** TYPE A-ABANDONED, U-UNANNOUNCED

March 1990

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION

UNIT 2
FIRE DRILL REPORT
1 2 3 4 QUARTER 1991

1.0 Summary (Also see the attached Summary Table)

Fire Drills were conducted to test the ability of the Nine Mile Point Unit 2 Fire Department to respond to and extinguish various fires. These are required quarterly drills per the provision of 10-CFR-50 Appendix R, Section III, para. 3b.

Also tested was the communications coordination that is required between the Fire Department, the Security Department, the Operations Department and the Radiation Protection Department to ensure and maintain safe operation of NMPNS Unit 2.

Attachment 2 to this report contains drill scenarios that were used during the performance of the drills. It also contains all the drill data sheets, observers notes, etc.

2.0 Deficiencies/Recommendations

Drill deficiencies and recommendations are indicated on the Individual Exercise/Drill Deficiency/Comment Sheets which can be found as Attachment 1 to this report.

3.0 Performance (Identify as Applicable)

- Drill performance satisfactory scenarios, no action required.
 Drill performance satisfactory, minor deficiencies in one or more drills; corrective action required.
 1 personnel actions needing attention
 3 equipment deficiencies/failures
 2 procedural deficiencies
 0 other
 At least one drill unsatisfactory: Drill(s) have been repeated within 30 days for shift(s) _____.

Submitted by: [Signature]

Generation Specialist
Fire Training

Date: 4/2/91

March 1988

Year: 1991
 Quarter: 1/2 3 4

MINE MILE POINT, UNIT Z
 SUMMARY TABLE

SHIFT*	DRILL NO.	DESCRIPTION	DATE	TIME	TYPE**	DEFICIENCY NOTED	DEFICIENCY REPIES
A	2-89-14	TB 250 EHC SKID	2/13/91	0545	A U	—	—
B	S.T.E Drill #20	TB 326 Bearing	2/26/91	0900	A/U	—	—
C	2-89-05	C.B. 237 CABLE REACTIVE	3/12/91	1600	A	—	—
D	2-89-06	TB 277 Lube o.1 box	2/20/91	0545	U	—	—
E	2-89-09	D.0 II Diesel	3/6/91	0530	U	—	—

* IDENTIFY UNSATISFACTORY DRILL PERFORMANCE
 BY SHIFT AND DATES REFER AS APPLICABLE (30 DAYS)

** TYPE A-ANNOUNCED, U-UNANNOUNCED

NIAGARA MOHAWK POWER CORPORATION
NINE MILE POINT NUCLEAR STATION
 UNIT I-II
 FIRE DRILL REPORT
 1 2 3 4 QUARTER 1991

- 1.0 Summary (Also see the attached Summary Table)
 Fire Drills were conducted to test the ability of the Nine Mile Point Unit 1-2 Fire Department to respond to and extinguish various fires. These are required quarterly drills per the provision of 10-CFR-50 Appendix R, Section III, para. 3b.

Also tested was the communications coordination that is required between the Fire Department, the Security Department, the Operations Department and the Radiation Protection Department to ensure and maintain safe operation of NMPNS Unit 1.

Attachment 2 to this report contains drill scenarios that were used during the performance of the drills. It also contains all the drill data sheets, observers notes, etc.

- 2.0 Deficiencies/Recommendations
 Drill deficiencies and recommendations are indicated on the individual Exercise/Drill Deficiency/Comment Sheets which can be found as Attachment 1 to this report.

- 3.0 Performance (Identify as Applicable)
- Drill performance satisfactory scenarios, no action required.
 - Drill performance satisfactory, minor deficiencies in one or more drills; corrective action required.
 - 1 personnel actions needing attention
 - 3 equipment deficiencies/failures
 - 2 procedural deficiencies
 - 0 other
 - At least one drill unsatisfactory: Drill(s) have been repeated within 30 days for shift(s) E.

Submitted by: James Woodruff
 Generation Specialist
 Fire Training

Date: 6-28-91

March 1988

Year: 1991
 Quarter: 1(2)34

NINE MILE POINT, UNIT 1+2
 SUMMARY TABLE

SHIFT	DRILL NO.	DESCRIPTION	DATE	TIME	TYPE**	DEFICIENCY NOTES	DEFICIENCY DATES
C	1-89.08	Tractor in North Yard - 9m1	5/3/91	0830	A	None	N/A
E	1-89.08	Tractor in North Yard - 9m1	5/10/91	0830	A	Operational Deficiencies (Will Repeat Daily)	Free Prod.
A	1-89.08	Tractor in North Yard - 9m1	5/24/91	0832	A	None	N/A
D	1-89.08	Tractor in North Yard - 9m1	5/24/91	1025	A	None	N/A
B	Annual Fire Drill	Fire in Scaevell - 9m2	6/4/91	1900	U	None	N/A
E	1-89.08	Tractor in North Yard - 9m1	6/7/91	0855	A	None - Repeat Daily	N/A

* IDENTIFY UNSATISFACTORY DRILL PERFORMANCE
 BY SHIFT AND DATES REFER AS APPLICABLE (30 DAYS)
 ** TYPE A-ANNOUNCED, U-UNANNOUNCED

Year: 1991

Quarter: 1 2 3 4

NINE MILE POINT, UNIT 1+2

SUMMARY TABLE

SHIFT*	DRILL NO.	DESCRIPTION	DATE	TIME	TYPE**	DEFICIENCY NOTED	DEFICIENCY DEPT(S)
D	2-89.04	S. Aux BLDG. EL 237 Div I HVAC Rm	8/7/91	1310	U	None	
C	2-89.09	Div. II Diesel Generator Rm	8/16/91	1325	U	None	
E	2-89-12	Screenwell - Circ. Water Pump Motor "F"	8/21/91	1325	U	None	
B	2-89.11	CB 214 - 230° Div II ELECTRICAL TUNNEL	8/28/91	1330	U	None	
A	2-89.07	RB 328 SW Motor Fire	9/5/91	0830	U	None	

* IDENTIFY UNSATISFACTORY DRILL PERFORMANCE
BY SHIFT AND DATES RERUN AS APPLICABLE (30 DAYS)

** TYPE A-ANNOUNCED, U-UNANNOUNCED