

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No.: 50-275/91-41 and 50-323/91-41  
License No.: DPR-80 and DPR-82  
Licensee: Pacific Gas and Electric Company  
77 Beale Street  
San Francisco, California 94106  
Facility Name: Diablo Canyon Nuclear Power Plant (DCPP), Units 1 and 2  
Inspection at: Region V, Walnut Creek, California  
Inspection Conducted: December 20, 1991, - February 10, 1992

Inspector: Arthur D. McQueen 2/14/92  
A. D. McQueen Date Signed  
Emergency Preparedness Analyst

Approved by: James H. Reese 2/14/92  
James H. Reese, Chief Date Signed  
Safeguards, Emergency Preparedness  
and Non-Power Reactor Branch

Summary:

Areas Inspected: This inspection by a region-based inspector examined the submittal by the licensee of Revision 13 to Emergency Preparedness Implementing Procedure (EPIP) EP G-1, titled "Accident Classification and Emergency Plan Activation." This EPIP implements the Emergency Action Level (EAL) classification system for the DCPP. During this inspection, portions of Inspection Procedures 82201 and 82701 were used.

Results: In the areas inspected, the licensee's emergency preparedness program appeared adequate to accomplish its objectives. Revision 13 to EPIP G-1 appears consistent with previous versions approved by NRC Headquarters as meeting regulatory requirements. Specific elements of the review are discussed in the Inspection Report Details, paragraph 2 below.

## INSPECTION DETAILS

### 1. Key Persons Contacted

P. A. Steiner, Supervisor, Emergency Planning, DCPD

### 2. Functional or Program Areas Inspected

The licensee program appears adequate to accomplish their objectives.

BACKGROUND: This inspection consisted of an in-office review of Revision 13, to DCPD EPIP EP G-1, "Accident Classification and Emergency Plan Activation." Questions pertaining to changes indicated in the EPIP were discussed with the licensee on January 30, 1992, wherein the licensee also indicated that the cognizant local and state government agencies had concurred in this EPIP revision. A discussion of licensee indicated changes and two items involving no indicated changes follows.

- a. CHANGE: (Page 1 of 8, Section 1.2) The Table of Contents lists section names only and deletes former subsection titles under sections 3 and 5.

NRC Comment: This is apparently a cosmetic change with no substantive impact on emergency preparedness or planning.

- b. CHANGE: (Pages 2, 4, and 5 of 8; Sections 2.3, 5.2.2.a and b, 5.3.2.a and b) In five instances the phrase "...and the State Office of Emergency Services..." is added to the San Luis Obispo (SLO) County Sheriff's Watch Commander for notification of an emergency event ASAP (as soon as possible), and in all cases, within 15 minutes.

NRC Comment: This is a procedure enhancement to ensure that the State is notified as quickly as the County.

- c. CHANGE: (Page 2 of 8, Section 2.4) A section is added to alert decision makers to review events for reportability even though they do not meet minimum criteria for classification as an emergency event under this procedure.

NRC Comment: The change appears to be a cosmetic improvement.

- d. CHANGE: (Page 2 of 8, Sections 3.1.1.c and 3.1.2.a) The term "radiation material" is changed to "radioactive material."

NRC Comment: The changes appears cosmetic with no adverse impact on emergency preparedness or planning.

- e. CHANGE: (Page 3 of 8, Sections 3.1.3.a and 3.1.4.c) The designation "...PAGs..." (Protective Action Guidelines) is changed to read "...EPA PAGs..." (Environmental Protection Agency).

NRC Comments: This a cosmetic change with no substantive impact on emergency preparedness or planning.

- f. CHANGE: (Page 3 of 8, Section 3.2) This section is deleted in the revision. In former revisions, this section dealt with the use of "Appendix Z of Emergency Procedures E, ECA, FR, R or M" for emergency classification guidance. NRC inspection followup item (IFI) 90-22-02 indicated that past inspections had found inconsistencies between Appendix Z guidance and EPIP EP G-1 guidance.

NRC Comment: This change makes EPIP EP G-1 (at Section 5.1) the source for event classification guidance. Section 5.1 states

Classify and declare the event according to Attachment 8.1 of this procedure ONLY. (Use Appendix Z information for GUIDANCE ONLY.)

With this change, IFI 50-275/90-22-02 is closed.

- g. CHANGE: (Page 3 of 8, Section 3.2) Former reference to "NPAP C-11 - Nonroutine Notification and Reporting to the Nuclear Regulatory Commission (NRC) and Other Government Agencies" is moved to section 6 in this revision.

NRC Comment: The change appears cosmetic with no substantive impact on emergency preparedness or planning.

- h. CHANGE: (Page 3 of 8, Section 4.0) This section is revised to set forth principal responsibilities for the Interim Site Emergency Coordinator (Interim SEC) and the Site Emergency Coordinator (SEC). Former subsections listing detailed listings of functions are deleted; along with former Attachment 8.2 (Initial Emergency Response Checklist). Under section 5.0, "Instructions," functions for these managers are set forth and they are referred to EPIP EP G-2, which sets forth detailed lists of organization functions for emergency managers.

NRC Comment: Although the checklists have been deleted, the duties and responsibilities are contained within the text of this and other EIPs. During the most recent routine inspection at the site, the licensee indicated that a project has been initiated to revise and improve all EIPs. This revision will include creation of checklists and simplified procedures for virtually all emergency responders. There is no regulatory requirement for the inclusion of checklists.

- i. CHANGE: (Page 3 of 8, Section 5.1) A new subsection is added to clarify the use of Appendix Zs and to indicate that
- o Simultaneous EALs (Emergency Action Levels) that increase the probability of release require escalation of the classification to one level above the higher EAL.
  - o All emergency classification declarations should immediately be formally announced to the Control Room and over the Site PA (Public Address) system.

NRC Comment: See also item f. above. These changes appear to enhance emergency preparedness. They remind a decision maker that a combination of classifiable events may indicate a degraded condition calling for a higher classification. The announcement makes all personnel aware that an emergency condition has been identified and is being responded to.

- j. CHANGE: (Page 4 of 8, Section 5.2) This section is merely a renumbering of former section 5.1. Former section 5.1.1.a regarding minimum functions to be assigned upon declaring a Notification of Unusual Event (NUE) is deleted. These functions are covered in EPIP EP G-2

NRC Comment: The change appears cosmetic with no impact on emergency preparedness.

- k. CHANGE: (Page 4 and 5 of 8, Sections 5.2.2.e and 5.3.2.e) Two subsections are added stating "Evaluate airborne releases of radioactive materials using EP R-2, 'Release of Airborne Radioactive Materials'" under the emergency classifications.

NRC Comment: The additions are a reminder to persons declaring an emergency event to take action in event of evidence of an airborne release. As such, it may be considered an EPIP improvement.

- l. CHANGE: (Page 5 of 8, Section 5.2.3) This is merely a renumbering of former subsection 5.1.3.

NRC Comment: The change appears cosmetic with no impact on emergency preparedness.

- m. CHANGE: (Page 5 of 8, Section 5.3) This new section combines former sections 5.2, 5.3 and 5.4 with additions as discussed below.

NRC Comment: The change appears cosmetic with no substantive impact on emergency planning.

- n. CHANGE: (Page 6 of 8, Section 5.3.5) A section is added to remind emergency decision makers to "Consider the necessity for appropriate Protective Action Recommendations (PARs) to county authorities per EP G-3 (Site Area and General Emergency ONLY.)"

NRC Comment: The change appears appropriate based on section reorganization at item m above (i.e., consolidation of the Alert, Site Area and General Emergencies into one section).

- o. CHANGE: (Page 6 of 8, Section 5.3.7) This new section combines the former sections 5.2.6 and 5.2.7 with some rewording.

NRC Comment: Rewording appears minor and substance of the former elements remains the same.

- p. CHANGE: (Page 6 of 8, Sections 5.3.8 and 5.3.9) These are new sections to replace former sections 5.3.8, 5.3.9, and 5.4.7.

NRC Comment: The changes appear cosmetic with no substantive impact on emergency preparedness or planning.

- q. CHANGE: (Pages 6 and 7 of 8, Section 6.0) Additional references are added pertaining to "Protective Action Guidelines," "Emergency Offsite Dose Calculations," and "Nonroutine Notification and Reporting to the NRC and other Governmental Agencies."

NRC Comment: The change appears cosmetic with no substantive impact on emergency preparedness or planning.

- r. CHANGE: (Page 7 of 8, Section 7.0) Two new records are added, pertaining the NUE and the other pertaining to the Alert, Site Area Emergency (SAE), and the General Emergency (GE).

NRC Comment: This appears to be a record keeping enhancement to the procedure.

- s. CHANGE: (Page 8 of 8, Section 8.0) Former attachment 8.2 (Initial Emergency Response Checklist) is deleted.

NRC Comment: Due to the consolidation of the three higher levels of classification in the new revision (item m above), the form no longer reflected the procedure concept. The form was not based on a regulatory requirement.

The following comments refer to Attachment 8.1 of the EPIP.

- t. CHANGE: (Page 1 of 6, Section I.1, Unusual Event) As formerly read "...over exposure or injury involving radioactive material" is changed to read "...over exposure or contaminated injured personnel."

NRC Comment: This cosmetic change makes wording consistent with the sample initiating condition for this item in NUREG-0654. The change is cosmetic and acceptable.

- u. CHANGE: (Page 3 of 6, Section VI.5, Alert) ".57 mR/hr" is changed to read "0.57 mR/hr."

NRC Comment: This is a cosmetic change with no impact on emergency preparedness.

- v. CHANGE: (Page 3 of 6, Sections VI.8 and VI.9, Alert) "...boundaries of radiologically controlled areas..." is changed to read "...boundaries of radiation controlled areas..."

NRC Comment: This is an apparent cosmetic change with no impact on emergency preparedness.

- w. CHANGE: (Page 3 of 6, Section VI.4, General Emergency) Two changes are indicated. "(1000 mR/hr)" and "(5000 mR/hr)" are added behind "1 Rem/hr" and "5 Rem/hr," respectively. Also, as formerly read

"...monitor levels are used..." is changed to read "...monitor level."

NRC Comment: These are cosmetic changes to clarify and preclude misreading of radiation levels.

- x. CHANGE: (Page 4 of 6, Section VIII.12, Alert) In the former statement "...decay heat removal available (e.g. flooded...," the word available is deleted.

NRC Comment: The change is editorial cosmetic with no noted impact on emergency preparedness.

- y. CHANGE: (Page 4 of 6, Section VIII.13, Alert) As formerly read "(see figure 1 of OP AP-16)" is changed to read "(see Appendix B of OP AP SD series)."

NRC Comment: The licensee has indicated that based on an event at the site during plant shutdown, a new set of five shutdown procedures has been developed. These replace completely the former OP AP-16. The change is therefore necessary to reflect the correct location of decision making data.

- z. CHANGE: (Page 4 of 6, Section IX.17, Unusual Event) As formerly read "...California.." is changed to read "...CA.."

NRC Comment: This is a cosmetic change with no impact on emergency preparedness.

- aa. CHANGE: (Page 5 of 6, Section XI.15, Site Area Emergency) As formerly read "...Missile, Airplane crash.." is changed to read "...Airplane, missile crash..."

NRC Comment: This is a cosmetic change with no impact on emergency preparedness.

- ab. CHANGE: (Page 5 of 6, Section XI, Unusual Event) As formerly read "...and determination of a rotating component has failure..." is changed to read "...and it is determined that a rotating component has failed."

NRC Comment: The change is editorial cosmetic, with no impact on emergency preparedness.

- ac. CHANGE: (Page 6 of 6, Section XII, General Emergency) As formerly read "...General Emergency #5..." is changed to read "...General Emergency #3..."

NRC Comment: This change was necessary to correct an incorrect reference in the EAL chart.

3. Exit Interview.

The licensee was tentatively notified of the results of the Region V review of EPIP EP G-1 on January 30, 1992, during a routine emergency preparedness inspection at the site and was informed that the revision changes appeared acceptable for implementation.