

EMERGENCY PLAN EVALUATION REPORT
ONCatawba Nuclear StationDuke Power CompanyEmergency Plan Dated (August 1980), March 31, 1981**EVALUATION SUMMARY**

The Catawba Nuclear Station Emergency Plan dated March 31, 1981, was evaluated using the sixteen Planning Standards and the 96 supporting criteria in NUREG-0654.

The evaluation shows that, of the sixteen standards, one was satisfied, seven were satisfied except as noted, and eight were not satisfied. The rating of unsatisfactory was given to these Planning Standards: C, Emergency Response Support and Resources; D, Emergency Classification System; G, Public Education and Information; H, Emergency Facilities and Equipment; I, Accident Assessment; K, Radiological Exposure Control; O, Radiological Emergency Response Training; and P, Responsibility for the Planning Effort.

The Planning Standards rated as unsatisfactory were so rated because the Emergency Plan failed to address the substantive points expressed in the Standard and in the evaluation criteria. The Planning Standards rated as satisfactory except as noted were so rated because the Emergency Plan failed to address, provided insufficient information about or was unclear regarding some of the pertinent points enunciated in the Planning Standards' evaluation criteria. Comments were made on each of the deficiencies noted.

In the pages that follow, findings on each Standard and its evaluation criteria are presented. A synopsis of criteria that are properly addressed is given, and evaluation of the degree of satisfaction provided by the plan is made and a set of comments noting deficiencies within criteria is provided.

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EMERGENCY PLAN EVALUATION REPORT ON:

Catawba Nuclear Station

FINDINGS ON STANDARDS & CRITERIA**A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATIONAL CONTROL)**Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Synopsis:

- . The Federal, State, local and private sector organizations that are intended to be part of the overall response organization are identified.
- . The licensee's concept of operation and relationship to the roles of other organizations is described.
- . A diagram of the Emergency Plan is provided (Figure 3.0-1).
- . The Emergency Coordinator (Shift Supervisor until relieved by the Station Manager) is identified as the individual who shall be in charge of the emergency response.
- . 24-hour per day emergency response, including 24-hour per day manning of communications links, is provided for.
- . Some written agreements for support by local agencies are included in Section 10 of the Emergency Plan.
- . Continuity of personnel, resources and equipment can be obtained by the station through the Duke Power Crisis Management Center.

Evaluation: The plan satisfies Planning Standard A except as noted.

Criterion 1a: No mention is made of support from such private sector organizations as other utilities or the NSSS in the sections describing offsite support (5.0). However the vendor, Westinghouse, is indicated in Figure 3.0-1, which provides a diagram of the Emergency Plan.

Criterion 3: Eight written agreements verifying the agency's intent to provide support to the Catawba Nuclear Station in the event of an emergency are provided in Section 10 of the Emergency Plan and correspond to agencies listed in Section 5.3.2 on Local Support Services. The City of Rock Hill Civil Defense also has provided a letter of agreement but is not among the agencies listed in Section 5.3.2. Eight agencies listed in 5.3.2 do not have letters of agreement attached to the Emergency Plan. The letters of agreement are dated between October 1979 and December 1979.

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Catawba Nuclear Station

A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATIONAL CONTROL (Cont.))

Criterion 4: The plan does not state explicitly that the licensee is capable of continuous 24-hour operations for a protracted period although this is implied by the descriptions of the functions of the Duke Power Crisis Management Center. No individual is specified by title as responsible for assuring continuity of resources although it is implied that this would be the Recovery Manager. The plan states: "Lines of authority, responsibilities and functions are as normally established within the Duke Power Crisis Management Plan through the Recovery Manager at the Crisis Management Center."

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B. ONSITE EMERGENCY ORGANIZATIONPlanning Standard

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

Synopsis:

- . The onsite emergency organization of plant staff personnel and its relation to the responsibilities and duties of the normal staff complement are described.
- . The Emergency Coordinator is designated as the individual with the authority to direct and coordinate emergency actions, including providing protective action recommendations to relevant offsite authorities.
- . The functional responsibilities assigned to the Emergency Coordinator are described.
- . The line of succession for the Emergency Coordinator is given in the CMP.
- . Minimum on-shift staffing levels as indicated in NUREG-0654, Table B-1, are provided and the capability to augment on-shift staffing indicated.
- . Interfaces between and among the onsite functional areas of emergency activity, licensee headquarters support, and State and local governmental response organizations are illustrated in a block diagram (Figure 3.0-1).
- . Services to be provided by local agencies for handling emergencies are identified.
- . The licensee has specified, in the CMP, the corporate management, administrative and technical support personnel who will augment the plant staff.

Evaluation: The plan satisfies Planning Standard B except as noted.

Criterion 1: It is not clear that the relationship between the normal staff complement and the onsite emergency organization are described for all shifts.

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B. ONSITE EMERGENCY ORGANIZATION (Cont.)

Criterion 4: Those functions of the Emergency Coordinator which may not be delegated are not established in the Emergency Plan.

Criterion 5: Table 5.1-1 in the licensee's plan provides an enumeration of minimum staffing requirements which appears to correspond to that required by NUREG-0654, Rev. 1. However, a discrepancy can be noted in Table 5.1-1 in that it gives the total minimum staff as numbering 10, while the count of personnel not indicated to be provided by shift personnel assigned other functions is 12. The 26 staff members to augment the minimum staff complement are indicated as available within one hour, however, the requirement is for some of this staff to be available within 30 minutes.

Criterion 8: The plan does not specifically mention the contractor or private organizations which may be requested to provide technical assistance although Westinghouse is indicated in Figure 3.0-1, which depicts a simplified diagram of the Emergency Plan.

Criterion 9: See the discussion under Planning Standard A, Criterion 3, with respect to the status of agreements with local agencies for emergency support services. Also, there may be less than adequate detail in the plan and the statements of agreement with respect to the delineation of authorities, responsibilities, and limits on action of the parties involved.

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C. EMERGENCY RESPONSE SUPPORT AND RESOURCESPlanning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

Synopsis:

- . Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.
- . Arrangements for the DOE Radiological Assistance Team to assist with detailed offsite monitoring and to provide other advice are addressed.
- . Public sector agencies which can provide assistance with security, firefighting, medical, ambulance, and radiological monitoring are identified.
- . The licensee has identified laboratory facilities and organizations which will provide assistance during an accident.

Evaluation: The plan does not satisfy Planning Standard C for the following reasons.

Criterion 1: The licensee's plan does not indicate what Federal resources are expected for the different accident categories, nor the resources needed to support the Federal response (with the exception of a mention in Section 7 that the Crisis Management Center "is available to the DOE Radiological Assistance team"). The plan states only that "arrangements have been made" with the DOE Radiological Assistance Team.

Criterion 2b: This criterion is not satisfied, as no provision is made in the plan for the dispatch of a representative to principal offsite governmental EOC's.

Criterion 4: No nuclear or other private facilities are identified which can provide assistance in an emergency. See Planning Standard A, Criterion 3, for a discussion of the letters of agreement.

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D. EMERGENCY CLASSIFICATION SYSTEMPlanning Standard

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

Synopsis:

- . An emergency classification and emergency action level scheme corresponding to the one set forth in Appendix 1, NUREG-0654 is established.
- . The example initiating conditions listed in Appendix 1, NUREG-0654 and the spectrum of postulated accidents addressed in the plant FSAR are discussed.

Evaluation: The plan does not satisfy Planning Standard D for the following reasons.

Criterion 1: The plan does not identify the parameter values and equipment status for each emergency class.

Criterion 2: The following corrections should be made in the Example Initiating Conditions.

An initiating condition for a Site Emergency should be included which states "transient requiring operation of shutdown systems with failure to Scram."

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E. NOTIFICATION METHODS AND PROCEDURESPlanning Standard

Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and followup messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

Synopsis:

- . Notification of response organizations consistent with the emergency classification and action level scheme is addressed, and the verification procedure indicated on the message format.
- . The plan indicates that emergency response personnel can be alerted and mobilized.
- . An initial message format, including the required information, is provided for in the plan.
- . A followup message format, including the required information is provided for in the plan.
- . The physical means and time required for providing notification to the public and the time required for notification are indicated.

Evaluation: The plan satisfied Planning Standard E except as noted.

Criterion 1: Notification is addressed in the plan although not in much detail and not necessarily in the locations indicated by the cross-reference.

Criterion 2: The plan indicates who is to alert and warn certain station personnel and under what conditions, but does not provide any detail on how off-shift personnel are alerted, and only minimal detail on how people within the plant are alerted (Figure 3.0-1 and Section 7.2). The cross-reference indicates that notification procedures are addressed in the Emergency Plan Implementing Procedures.

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E. NOTIFICATION METHODS AND PROCEDURES (Cont.)

Criteria 2 and 3: A message format for the initial and followup emergency messages has been designed and included in the plan (Section 10.0). It is specific and complete with the exception of not providing the telephone number of the caller in all instances or an estimate of the quality of radioactive material released or being released and the points and height of release.

Criterion 7: This criterion is not satisfied. The contents of the message intended for the public is not indicated in the Emergency Plan or the Crisis Management Plan.

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F. EMERGENCY COMMUNICATIONSPlanning Standard

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

Synopsis:

- . . Reliable primary and backup means of communication for communication by the licensee with local and State response organizations are provided.
- . Organizational titles and alternates for both ends of the communication links are provided.
- . 24-hour notification to and activation of the State/local emergency response network are provided.
- . Communications with contiguous State/local governments within the EPZs are provided.
- . Communications as needed with Federal Emergency response organizations are provided.
- . Communications between the nuclear facility and the Crisis Management Center (EOF), State and local EOCs and radiological monitoring teams are provided.
- . Provision for communication by the licensee with NPC Regional Office Emergency Operations Center and the Crisis Management Center (EOF) and the radiological monitoring team assembly area is addressed.

Evaluation: The plan satisfies Planning Standard F except as noted.

Criterion 1e: The plan indicates that on-site personnel can be alerted by means of a public address system but is not specific about how persons off duty will be notified and alerted.

Criterion 1f: The plan mentions that communication will be undertaken with the NRC regional office under specified conditions, but is not explicit about the means for doing this, or for communicating with the NRC headquarters. Communication means with the NRC are not explicitly mentioned in the section on Communication Systems (7.2) nor are links indicated on Figure 3.0-1, even though it indicates that NRC is to be contacted.

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F. EMERGENCY COMMUNICATIONS (Cont.)

Criterion 2: The plan states that the plant has a radio communication link with its emergency vehicle, and Figure 3.0 indicates a telephone link with the York General Hospital and ambulance service, but there is no explicit mention of a coordinated communication link for fixed and mobile medical support facilities.

Criterion 3: The testing of communications equipment is implied by the statement concerning communication drills for the purpose of developing and maintaining skills (8.1.2.2a). Also, Section 8.3.4 states that the radio transmitter/receivers will be operationally checked monthly. It would be desirable for the plan to contain a more detailed description of the schedule of testing for all communications systems and equipment, such as the onsite public address systems, and any special or dedicated phone lines which might exist between onsite facilities, or between the plant and offsite agencies.

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G. PUBLIC EDUCATION AND INFORMATIONPlanning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

Synopsis:

- . Periodic dissemination of educational information to the public regarding warning and protective action in the event of an emergency condition is addressed in the plan.
- . The provision of information in a written form which can be disseminated to permanent and transient population within the 10 mile EPZ is addressed in the plan.

Evaluation: The plan does not satisfy Planning Standard G for the following reasons.

Criterion 1: The special needs of the handicapped are not addressed as an item to be included in information to be disseminated to the public.

Criteria 3, 4, and 5: These criteria are not satisfied. The cross-reference indicates that they are addressed in the Crisis Management Plan. However these items are not found to be addressed in any manner within the licensee's Emergency Response Plan or the CMP.

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H. EMERGENCY FACILITIES AND EQUIPMENTPlanning Standard

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

Synopsis:

- . Onsite monitoring systems are identified including geophysical phenomena, radiological and process monitors as well as fire and combustion detectors.
- . Facilities and equipment for offsite monitoring are identified including geophysical, radiological and laboratory facilities. Provisions have been made for offsite radiological monitoring equipment to be near the plant.
- . An instrument surveillance, testing, and maintenance program has been established. A listing of emergency equipment and supplies is given in the Appendix of the Catawba plan.
- . Receipt and analysis of field monitoring data will be done at the TSC until the CMC is operating, at which time the CMC will take over the task of analyzing field data.

Evaluation: The plan does not satisfy Planning Standard H for the following reasons.

Criterion 1: A Technical Support Center and onsite operations support center have been established; however there is insufficient information to determine whether the TSC and OSC meet NUREG-0696 requirements.

Criterion 2: A Crisis Management Center (CMC) has been established; however, there is insufficient information to determine whether the CMC meets NUREG-0696 requirements.

Criterion 4: Timely activation and staffing of the TSC, OSC and CMC is not specifically addressed in the Catawba plan.

Criterion 5b: Wound monitors are not addressed.

Criterion 6a: Hydrologic and seismic monitors are not addressed.

Criterion 8: Meteorological instrumentation and procedures as described in the plan do not satisfy the criteria in Appendix 2.

Criterion 9: Supplies are kept in the Control Room and not the OSC as required.

Criterion 10: Reserves of equipment and instruments are not addressed nor is the calibration of equipment.

Catawba Nuclear Station

I. ACCIDENT ASSESSMENTPlanning Standard

Adequate method, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

Synopsis:

- . The Emergency Plan discusses instrument capability in the form of area monitors and process monitors which provides detection and continued assessment during emergencies.
- . The licensee is capable of acquiring and evaluating meteorological information, including wind speed and direction, temperature, and vertical gradient and precipitation.
- . Survey teams equipped with portable monitor and air sampling equipment can be deployed to make a rapid survey of areas downwind of the station to determine the extent and magnitude of radioactive releases to the environment.

Evaluation: Planning Standard I is not satisfied for the following reasons.

Criterion 1: The Catawba Emergency Plan does not identify plant system and effluent parameter values which are characteristic of a spectrum of off-normal conditions and accidents.

Criterion 2: Resources to provide initial values and continuing assessment of emergency conditions are available; however, post-accident sampling capability and containment radiation monitoring is not addressed in the plan.

Criterion 3: The techniques for determining the source term of release of radioactive material within the plant system is not addressed nor is the technique for determining the magnitude of release based on plant system parameters and effluent monitors.

Criterion 4: The licensee has not established in the emergency plan the relationship between effluent monitor readings and onsite and offsite contamination for various meteorological conditions.

Criterion 5: Information in the plan concerning meteorological data does not meet the Appendix 2 criteria. Access to meteorological data at the CMC, TSC, Control Room and offsite NRC center is not addressed. Also, the plan does not address making meteorological data available to the State.

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I. ACCIDENT ASSESSMENT (Cont.)

Criterion 6: The plan does not address a method for determining the release rate/projected dose if instrumentation is offscale or inoperable.

Criterion 8: The Catawba plan does not identify means of notification of the survey teams or their composition. The type of monitoring equipment used is not identified.

Criterion 9: The Catawba plan states that radioiodine concentrations can be measured as low as 5×10^{-8} $\mu\text{Ci/cc}$; however the instrumentation used for this measurement is not identified.

Criterion 10: The licensee has not established, in the Catawba Emergency Plan, a means for relating various measured parameters to dose rates for key isotopes and gross radioactivity measurements. In addition, the plan does not address estimating integrated dose from projected and actual dose rates and comparing these numbers with protective action guides.

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J. PROTECTIVE RESPONSEPlanning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

Synopsis:

- . If the Station Manager determines that a site evacuation is necessary, the signal horns are sounded as an evacuation signal to all persons on station property.
- . Evacuation is by designated pre-planned routes which avoid contaminated locations. Reassembly is at the Duke Power Company Newport Tie-Station.
- . Personnel accountability is the responsibility of each supervisor, who will report missing persons to the Station Manager or in off-hours to the Shift Supervisor. Accountability will be performed in 30 minutes.
- . Protective equipment and supplies will be distributed to and used by personnel onsite to minimize the effects of radiological exposures or contamination.
- . The licensee has provided a guide for making protective action recommendations to the State and local authorities.
- . The licensee makes provisions for radiological monitoring of people evacuated from the site.

Evaluation: Planning Standard J is satisfied except as noted.

Criterion 1: Warning of onsite individuals and individuals who may be in areas controlled by the operator is by an electric signal horn. The time required to warn or advise individuals is not addressed.

Criterion 4: The Catawba plan states that individuals will be evacuated from the site if it is likely they will receive doses higher than 10 CFR 20 limits; however, the plan does not address evacuation of non-essential personnel during a Site or General Emergency.

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J. PROTECTIVE RESPONSE (Cont.)

Criterion 8: The licensee's plan contains evacuation time estimates; however, all the information required in Appendix 4 is not available. For example, the methodology of determining the evacuation time estimate is not specified in the plan.

Criteria 10a and b: Maps are not included in the emergency plan.

Criterion 10c: The plan does not specifically address notifying transient people in the area that an emergency is occurring.

Criterion 10m: Expected local protection afforded in residential units or other shelters for direct and inhalation exposure as well as evacuation time estimates are not addressed in the plan.

Catawba Nuclear Station

K. RADIOLOGICAL EXPOSURE CONTROLPlanning Standard

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

Synopsis:

- . The plan identifies exposure guidelines for removal of injured persons, undertaking corrective actions, providing first aid, performing personnel decontamination, providing ambulance service and medical treatment.
- . The Catawba plan specifies action levels for determining the need for decontamination.
- . The licensee provides access control, contamination control of drinking water and food, and criteria for permitting the return of areas and items to normal use.
- . The capability for decontamination of relocated personnel is addressed.

Evaluation: Planning Standard K is not satisfied for the following reasons.

Criterion 1: The emergency plan does not identify specific onsite exposure guidelines for performing assessment actions.

Criterion 2: The Catawba plan does address an onsite radiation protection program to be implemented during emergencies, however the System Health Physics Manual was not available for review.

Criterion 3a: The plan does not indicate that provisions for 24-hour per day capability is available to determine doses received by emergency workers.

Criterion 3b: Reading of personnel dosimeters and record keeping for emergency workers is not addressed.

Criterion 5b: Means for radiological decontamination of personnel is addressed in the plan; however decontamination of supplies, instruments and equipment is not addressed nor is waste disposal.

Criterion 7: The Catawba plan addresses the capability for decontaminating relocated onsite personnel; however, extra clothing and decontaminates are not addressed.

Catawba Nuclear Station

L. MEDICAL AND PUBLIC HEALTH SUPPORTPlanning Standard

Arrangements are made for medical services for contaminated injured individuals.

Synopsis:

- . Arrangements for hospital and medical services have been made with the York General Hospital as the primary facility and with Charlotte Memorial Hospital as a backup facility.
- . Onsite first aid capability is provided.
- . Arrangements have been made with the York General Ambulance Service for transporting victims of radiological accidents to medical support facilities.

Evaluation: The plan satisfies Planning Standard L except as noted.

Criterion 1: Section 10.0 contains a written agreement for the York General Hospital and Ambulance Service but no written agreement with Charlotte Memorial Hospital is included.

Catawba Nuclear Station

M. RECOVERY AND REENTRY PLANNING AND POST-ACCIDENT OPERATIONSPlanning Standard

General plans for recovery and reentry are developed.

Synopsis:

- General plans and procedures for reentry and recovery are developed and the means are described by which decisions to relax protective measures are reached.
- A description of the off-site Recovery Organization is provided in the Duke Power Crisis Management Plan.
- Offsite response organizations will be informed about the initiation of a recovery operation and of any changes in the organizational structure by the Recovery Manager at the Crisis Management Center.
- An estimate of the total population exposure will be established as needed by the Recovery Manager at the Crisis Management Center and the Radiological Coordinator at the CMC will retain resources and procedures necessary to perform the estimate.

Evaluation: The plan satisfies Planning Standard M.

Catawba Nuclear Station

N. EXERCISES AND DRILLSPlanning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Synopsis:

- . An exercise will be conducted once every twelve months which will simulate an emergency that would require response by offsite authorities.
- . The emergency exercise scenario is to be varied from year to year such that all major elements of the plan and preparedness organizations are tested within a five-year period. This will include an exercise started between 6:00 p.m. and midnight and another between midnight and 6:00 a.m. at least once every six years.
- . Required communications drills for State and local governments within the plume exposure pathway EPZ and for the nuclear facility, State and local EOC's and field assessment teams are provided.
- . Required fire drills are provided.
- . Required medical drills are provided.
- . Required radiological monitoring drills are provided.
- . Required health physics drills are provided.
- . The scenarios for use in exercises and drills are to include the required information.
- . A critique by qualified observers, resulting in a formal evaluation is provided.
- . Management control to ensure corrective actions based on evaluations of the exercises and drills is addressed in the plan.

Evaluation: The plan satisfies Planning Standard N except as noted.

Criterion 1a: No mention is made of the use of forthcoming NRC and FEMA rules in the conduct of exercises.

Catawba Nuclear Station

N. EXERCISES AND DRILLS (Cont.)

Criterion 1b: Exercises conducted under various weather conditions, or unannounced exercises, are not addressed. The plan states that "qualified observers" will be arranged for, but does not specify that these will be Federal and State observers/evaluators.

Criterion 2a: Required quarterly communication drills with Federal emergency response organizations and States within the ingestion pathway are not provided.

Criterion 2d: The plan does not make provision for testing of communications and record keeping during the annual radiological monitoring drills.

Criterion 3a: The description of the scenarios does not indicate that they will provide a statement of appropriate evaluation criteria.

Criterion 4: It is not specified in the plan that the qualified observers will be official observers from Federal, State or local governments.

Criterion 5: The plan states that management control to ensure corrective actions indicated by the exercises and drills will be established, but gives no indication of what these might be.

Catawba Nuclear Station

O. RADIOLOGICAL EMERGENCY RESPONSE TRAININGPlanning Standard

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Synopsis:

- . Emergency training of station personnel is performed to enable them to become familiarized with handling assigned responsibilities during an emergency.
- . Emergency training of medical support, rescue personnel and local fire department personnel is performed by Duke Power Health Physics personnel to instruct the individuals on how to handle emergencies under radiological conditions.

Evaluation: Planning Standard O is not satisfied for the following reasons.

Criterion 2: The plan does not indicate that classroom training is provided and that all members of the emergency organization are drilled to demonstrate ability to perform assigned emergency functions. On-the-spot correction of erroneous performance is not addressed.

Criterion 3: The plan does not specify that first aid training is equivalent to Red Cross Multi-Media.

Criterion 4: The specialized training and retraining programs indicated in 4a-j are not specifically addressed. The plan simply states that individuals will be trained to perform their assigned function during an emergency.

Criterion 5: Retraining of personnel is addressed; however the training is not specified as being conducted annually.

Catawba Nuclear Station

P. RESPONSIBILITY FOR THE PLANNING EFFORT:
DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANSPlanning Standard

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

Synopsis:

- . Special training is provided for directors and coordinators with key responsibility in the emergency organization.
- . The Station Health Physicist holds the title of Emergency Planning Coordinator with the responsibility of coordination of offsite emergency planning efforts.
- . Updates of the plan, including changes indicated by drills, are addressed in the plan.
- . A list, by title, of typical implementing procedures is included in the plan.
- . A specific table of contents and a cross-reference of the plan to the NUREG-0654 criteria are included in the plan.
- . A periodic audit of the emergency preparedness program is provided.
- . Provision is made for the updating of telephone numbers in the emergency procedures.

Evaluation: The plan does not satisfy Planning Standard P for the following reasons.

Criterion 1: Although the plan addresses special training for directors and coordinators, the statement is brief and very general, not making explicit which directors nor the nature of the training.

Criterion 2: This criterion calling for the title of the individual with overall authority and responsibility for radiological emergency response planning is not satisfied.

Criterion 3: It is not entirely clear that the responsibilities of the Emergency Planning Coordinator involve the development and updating of emergency plans. His duties are described as including the coordination of offsite emergency planning efforts and for planning emergency drills (Section 8.1.3), and as incorporating into the Emergency Procedures updated lists of persons with special qualifications for coping with emergency conditions (Section 8.2).

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P. RESPONSIBILITY FOR THE PLANNING EFFORT:
DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS (Cont.)

Criterion 4: The plan specifies that an emergency preparedness program audit will be conducted at least every two years and indicates that changes indicated by drills will be effected through normal station procedure change methods. No explicit statement is made about an annual certification that the plan is current.

Criterion 5: This criterion is not satisfied. The plan notes that outside services and agencies have been given a description of the Catawba Nuclear Station Emergency Plan and their part in assisting with an emergency, but does not indicate that these agencies have a copy of the plan per se, nor does it describe a procedure of distributing revised pages, dated and marked with changes.

Criterion 6: The list of supporting plans is given in the CMP; however it is not in the Catawba Emergency Plan as specified.

Criterion 7: The listing of typical implementing procedures does not include the section(s) of the plan to be implemented by each procedure.

Criterion 8: A cross-reference for the plan with these criteria is included in the plan. However often it is not as inclusive as it could be. Also, it gives the cross-reference only to the "chapter" in which the information might be found, and not to more specific sub-sections within that section of the plan, considerably reducing its value as a cross-reference to facilitate the finding of specific information in the plan. The cross-reference appears to be based on NUREG-0654, prior to Revision 1.

Criterion 9: Although an audit procedure is described (Section 8.2) there is no explicit reference made to its being an independent review and the plan does not indicate what entity conducts this audit. The plan specifies that the audit will be conducted at least every two years, rather than every twelve months as specified in this criterion. No arrangements are described for reporting the results of this review to involved Federal, State and local organizations.

Criterion 10: It is not clear that there are provisions for a quarterly updating of telephone numbers in the Emergency Procedures. The plan states that clerical changes, such as new phone numbers, will be incorporated as required, and that all telephone numbers will be verified as correct once each calendar year.