

May 25, 1984

Docket No. 50-483

Union Electric Company
ATTN: Mr. Donald F. Schnell
Vice President - Nuclear
Post Office Box 149 - Mail Code 400
St. Louis, MO 63166

Gentlemen:

This refers to the emergency preparedness appraisal follow up, exercise, and drill observation inspection conducted by Messrs. T. Ploski and M. Phillips and others of this office on March 19-23 and May 9-11, 1984, of activities at the Callaway Nuclear Power Plant authorized by Construction Permit No. CPPR-139, and to the discussions of our findings with you and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

No items of noncompliance with NRC requirements were identified during the course of this inspection.

We have examined the corrective actions taken by you and your staff towards resolving the forty-two Open Items identified during our January 1984 Emergency Preparedness Implementation Appraisal. The degree of attention devoted to emergency preparedness was evidenced by our determination that these items had been completed. The findings also indicate that there are items in your emergency preparedness program which need improvement, and these items are listed in the enclosed Appendix. These improvements are areas which we feel, based on professional judgment, should be corrected.

You are requested to submit a written statement within forty-five days from the date of this letter, describing the results of your consideration of each of the items in the Appendix.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter and the enclosed inspection report will be placed in the NRC's Public Document Room.

1E:35

11

May 25, 1984

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

C. J. Paperiello
C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Safety Branch

Enclosures:

- 1. Appendix, Emergency Preparedness Improvement Items
- 2. Inspection Report No. 50-483/84-10(DRMSP)

cc w/encls:

- W. H. Weber, Manager, Nuclear Construction
- S. E. Miltenberger, Plant Manager
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII Region IV
- K. Drey
- D. Rohrer, EPB, OIE
- D. Matthews, EPB, OIE
- M. Carroll, FEMA, Region VII
- Chris R. Rogers, P.E. Utility Division, Missouri Public Service Commission.

RIII

JP
Ploski/bl
05/24/84

RIII

JP
Patterson

RIII

JK
Kers

RIII

JS
Smith

RIII

WGS
Snell

RIII

PH
Phillips

RIII

WF
Forney

RIII

CJP
Paperiello
5/25/84

Appendix

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

Based on the results of the NRC's follow-up inspection of Open Items identified in the Callaway Nuclear Power Plant emergency preparedness program during the implementation appraisal and the results of the observation of the full-scale exercise, the following items should be considered for improvement:

A. Items identified during the follow-up inspection

- A1. The applicant should re-evaluate the assignment of Shift Technical Advisors as technical representative to the counties' Emergency Operations Centers in addition to their normal plant duties.
- A2. The applicant should evaluate the administrative burden of updating the various partial distributions of the Emergency Telephone Directory, i.e., the Emergency Callout Folders.
- A3. The Emergency Plan and appropriate procedures should be revised to specify that shift augmentation drills will be held on a semi-annual basis to ensure that augmentation can be accomplished as described in Table 5-1 of the Callaway Plant Emergency Plan.
- A4. Control Room personnel should receive additional familiarization training on dedicated communications equipment in the Control Room.
- A5. Shift Supervisors and Shift Technical Advisors should receive additional training on core damage assessment procedures.
- A6. Signs or arrows should be posted in the plant to indicate how to leave the facility and proceed to the appropriate assembly area.
- A7. Attachment 1 to EIP-ZZ-00212, "Protective Action Decision Flow Chart," should be revised to reduce confusion in its use by providing definitions for the terms "large fission product inventory" and "substantial core damage."
- A8. Attachment 1 to EIP-ZZ-00212, "Protective Action Decision Flow Chart," should be revised to clearly indicate that substantial core damage in process or occurring will always indicate that a General Emergency has been declared while still providing guidance on protective action recommendations for non-General Emergencies and a General Emergency declaration resulting from loss of physical control of the facility (e.g., a security event).

B. Items identified during observation of the full-scale exercise

- B1. Search and rescue team members should be retrained in the care of injured, contaminated personnel. Emphasis should be placed on avoiding leaving casualties unattended and the need to expedite transport of casualties to medical treatment facilities even at the expense of potentially spreading contamination onsite.

- B2. Control Room personnel should be retrained on the procedure for requesting offsite medical assistance.
- B3. The Health Physics Coordinator's emergency packet should include telephone numbers of local medical facilities to which injured, contaminated personnel may be transported.
- B4. The role of the Shift Technical Advisor during emergencies should be re-evaluated in order to make full use of the talents and capabilities of these individuals.
- B5. Procedural provisions should exist that allow a senior plant manager to relieve the Shift Supervisor of Emergency Coordinator responsibilities in the Control Room following proper in-briefing of the former, even if the TSC is not activated.
- B6. The applicant should develop and implement improved provisions for estimating the extent of core damage.
- B7. The applicant should re-evaluate the seating arrangement for Health Physics, Technical Assessment, and Operations and Maintenance Coordinators to facilitate their interface with each other and with the Emergency Coordinator.
- B8. Appropriate coordinators should be retrained that offsite protective measures beyond the immediate vicinity of the owner controlled area should only be warranted for General Emergency and not Site Area Emergency classifications.
- B9. Technical Support Center (TSC) status boards should contain information on both protective measures recommended and those implemented.
- B10. Internal messages should be routed to all TSC Coordinators. Adequate clerical staff should be available for this task and for compiling a real-time chronology of all TSC events.
- B11. Dose projection software should require for input the same units of measure as are available from instrument readouts to avoid human errors in conversion calculations.
- B12. Survey equipment provided for the Operational Support Center (OSC) area in the Service Building lunchroom should be located such that potentially contaminated personnel do not have to traverse the room in order to determine if they had become contaminated.
- B13. OSC foremen of in-plant teams should periodically contact their teams to verify their locations and to ensure that teams have heard public address announcements or have otherwise been informed of changing conditions which could impact their ability to accomplish assigned tasks.

- B14. The roles of the Emergency Operation Facility's Technical Support and Radiological Assessment Coordinators should be re-evaluated such that these individuals can better advise the Recovery Manager on matters related to protective action recommendation decisionmaking.
- B15. The applicant should consider permanently dividing the single Osage County subarea into two subareas, since Highway 89 is roughly along the border between 22.5 degree sectors H and J.
- B16. Previously forecast meteorological conditions should be doublechecked for continued accuracy when formulating revised protective action recommendations.
- B17. Emergency Operation Facility status boards should contain information on both protective action recommendations made and implemented. Information should be plotted both in terms of sectors and subareas.
- B18. The NRC workspace in the Recovery Center room should be provided with telephones for making onsite and offsite calls.
- B19. The Emergency Control Center room and State representative's room should be provided with clocks.
- B20. Offsite monitoring team coordinators should keep teams periodically advised on plant status, any changes to emergency classifications, and the status of offsite protective actions.
- B21. Reports of offsite survey results should include the appropriate units of measure.
- B22. Gloves should be used when replacing air sampler filter cartridges to reduce the risk of spreading contamination.
- B23. The initial press briefing on onsite activities should be conducted in a more timely manner.
- B24. The technical spokesperson should volunteer additional descriptive information on affected plant systems and should avoid using acronyms if he perceives that the media has difficulty in understanding his briefings.
- B25. If prolonged recovery operations are anticipated onsite, a Recovery Manager should be utilized in that capacity rather than as the technical spokesperson at the Joint Public Information Center.