

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-373/84-12(DRMSP); 50-374/84-16(DRMSP)

Docket Nos. 50-373; 50-374

License Nos. NPF-11; NPF-18

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: LaSalle County Station, Units 1 and 2

Inspection At: LaSalle Site, Seneca, IL

Inspection Conducted: May 7-11, 1984

Inspectors: *T. Ploski*
T. Ploski
Team Leader

5/29/84
Date

T. Ploski
G. Christoffer

5/29/84
Date

Approved By: *M. P. Phillips*
M. P. Phillips, Chief
Emergency Preparedness Section

5/29/84
Date

Inspection Summary

Inspection on May 7-11, 1984 (Report Nos. 50-373/84-12(DRMSP); 50-374/84-16(DRMSP))

Areas Inspected: Routine, announced inspection of the following areas of the emergency preparedness program: licensee actions on previously identified items; activation of the emergency plan; emergency detection and classification; protective action decisionmaking; notifications and communications; changes to the emergency preparedness program; shift staffing and augmentation; training; dose calculations and assessment; public information program; and licensee audits. The inspection involved 150 inspector-hours onsite by two NRC inspectors and two consultants.

Results: One item of noncompliance was identified in one area (activation of the emergency plan). No items of noncompliance or deviations were identified in the other areas inspected.

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DETAILS

1. Persons Contacted

G. Diederich, Station Superintendent
*R. Bishop, Assistant Superintendent for Administration
*C. Sargent, Assistant Superintendent for Operations
*F. Lawless, Rad/Chem Supervisor
*J. Lewis, GSEP Coordinator
*L. Bryant, GSEP Coordinator
*T. Blackmon, Emergency Planner, Tech Services Nuclear
*A. Scaccia, Offsite Emergency Planner, Tech Services Nuclear
*R. Kyroua, Quality Assurance Supervisor
*R. Crawford, Training Supervisor
*P. Manning, Assistant Tech Staff Supervisor
H. Hentschel, Shift Engineer
W. Sly, Shift Engineer
J. Shetterly, Shift Engineer
H. McLain, Shift Engineer
P. Weber, Shift Engineer
H. Barch, Training Instructor
J. Ahlman, Quality Assurance Engineer
P. Kuhel, Technical Administrator, Production Training Center
A. Mosel, Training Instructor, Production Training Center
T. Borzym, Security Administrator
P. Walsh, Office Supervisor
S. Majerchin, Central File Supervisor

*Indicates those present at May 11, 1984 exit interview.

2. Licensee Actions on Previously Identified Items

(Closed) Open Item 373/83-21-03; 374/83-21-02: Corporate staff must provide adequate guidance regarding recordkeeping related to Generating Stations Emergency Plan (GSEP) activations. The inspector reviewed correspondence dated October 4, 1983, from the Division Vice President and General Manager to all Station Superintendents which established retention periods for records related to GSEP activations, drills, and exercises. Records of GSEP activations are to be maintained for the lifetime of the Station, if such activations were associated with radioactive releases. Otherwise, GSEP activation records would be kept for 5 years. The correspondence also assigned responsibility to Station and Corporate GSEP Coordinators for maintaining adequate records of GSEP activations, drills, and exercises. This item is considered closed.

(Closed) Open Item 373/83-21-04; 374/83-21-03: The Station must establish an adequate recordkeeping system for GSEP activation related documents. Records associated with GSEP activations were maintained in two locations at the LaSalle Station. Copies of the Nuclear Accident Reporting System (NARS) form and any other records generated at the Technical Support Center and Operational Support Center were compiled and forwarded to Central Files,

where they would be retained for time periods in accordance with the guidance described above. The Shift Engineer's logbooks, which would contain entries regarding GSEP activations, were routed to the Station's archives where they would be processed into microfiche. The inspector reviewed records of 1983 and 1984 GSEP activations and verified that these records were readily available as described above. This item is considered closed.

(Closed) Open Item 373/83-21-05; 374/83-21-04: The licensee must establish criteria regarding the types of information to be included in GSEP drill records and establish an adequate recordkeeping mechanism. Station procedure LZF 1530-1, Exercises and Drills, has been revised to require that records of GSEP drills and exercises be sent to Central Files and be retained for time periods per the guidance described above. Should an Action Item Record (AIR) be initiated as a result of a drill or exercise critique, the AIR number would be referenced on the critique report filed with the drill and exercise records. The inspector determined that the Station's drill and exercise records were filed by year of occurrence in Central Files. Since the revision of LZF-1530-1, no drill has taken place which had necessitated initiation of an AIR. This item is considered closed.

(Closed) Open Item 373/83-27-01; 374/83-27-01: Procedure LZF 1110-1 must be revised to ensure that assembly is initiated promptly after the declaration of any Site Area or General Emergency and that assembly/accountability activities are completed prior to any evacuation of non-essential personnel. The licensee must also ensure that emergency response personnel are not denied access to the Protected Area while assembly/accountability activities are in progress. The inspector reviewed Revision 6 to procedure LZF 1110-1, Station Director (and Acting Station Director) Implementing Procedure, and determined that instructions listed under Site Area and General Emergency conditions had been reprioritized and reworded so that initiating assembly/accountability activities was mandatory and had higher priority. This procedure also indicated that these activities must be completed prior to evacuation of non-essentials. The inspector also reviewed Security Post Instruction LPI-117 and determined that it included provisions to ensure that authorized emergency workers would be allowed to egress and ingress the Protected Area while assembly/accountability activities were in progress. This item is considered closed.

(Closed) Open Item 373/83-27-02; 374/83-27-02: Revise procedures to ensure that emergency workers are provided with maximum respiratory protection when sent to areas having potential airborne activity. The inspector reviewed Revision 1 to procedure LZF-1330-50, Radiation Surveys Under Accident Conditions, and determined that step F.2 contained a precautionary note stating that the respiratory protection for plant areas where major releases...are suspected will be SCBA. To reinforce this point, the licensee conducted a training session in January, 1984, which emphasized respiratory protection for emergency workers, including Step F.2 of Procedure LZF-1330-50. This training was given to eleven individuals who could be assigned the role of Radiation Protection Supervisor in the Operational Support Center (OSC). This item is considered closed.

(Closed) Open Item 373/83-27-03; 374/83-27-03: Provide adequate survey forms (at the OSC) on which in-plant teams can document their survey results. The inspector examined the OSC equipment locker and determined that a master set of plant survey forms and two complete photocopy sets were available at this location. The survey forms stored in the locker were those routinely used by Radiation/Chemistry Technicians to document radiation levels throughout the plant during normal operation; hence, the RCTs would be familiar with these forms in the event they had to be used during an emergency situation. This item is considered closed.

3. Activation of the GSEP

(Closed) 373/83-XX-02 through 373/83-XX-06: Activations of the GSEP at the LaSalle County Nuclear Station. During the period April 1, 1983 through April 30, 1984, the on-duty Shift Engineer activated the GSEP on eight occasions. The inspectors reviewed the Shift Engineer's (SE's) log; copies of the Station's Nuclear Accident Reporting System (NARS) forms; and copies of the Load Dispatcher's (LD's) NARS forms and log. The SE's log and NARS forms were maintained at the Station, while the LD's NARS form and log excerpts were available through the licensee's corporate office. The inspector also contacted the Illinois Emergency Services and Disaster Agency (IESDA) and obtained a summary of times that IESDA was notified of GSEP activations for the period in question.

For other than General Emergency conditions, the notification procedure requires the Station to contact the LD, who then contacts the corporate Nuclear Duty Officer (NDO), who, in turn, notifies IESDA. For General Emergencies, the Station would directly notify IESDA. At each point in this notification chain, a NARS form is completed by both the caller and message recipient. During 1983 routine emergency preparedness inspections at this and others of the licensee's nuclear generating stations, inspectors determined that State agencies were not consistently being initially notified within fifteen minutes of GSEP activations, as required by 10 CFR 50, Appendix E, Paragraph IV.D.3. To alleviate this generic problem, the licensee worked with appropriate State governmental agencies to simplify the NARS form and also agreed that the LD would call appropriate offsite agencies directly if the NDO could not be reached within five minutes. Both notification procedure changes were to be implemented by September, 1983; however, the State of Illinois requested that the effective date be moved to October 1, 1983, to allow for additional training time on utilizing the revised NARS form.

The following table summarizes relevant time information for LaSalle Station GSEP activations:

GSEP ACTIVATIONS

APRIL 1983 - APRIL 1984

<u>Date</u>	<u>Classification</u>	<u>Declaration Time</u>	<u>IESDA Notified</u>	<u>Elapsed^a Time (minutes)</u>
4/9/83	Unusual Event	0430	0631	121
6/10/83	Unusual Event	1430	1650 ^b	140
6/30/83	Unusual Event	2220	2251	31
7/18/83	Unusual Event	1137	1223	46
8/18/83	Alert	1640	1657	17
3/23/84	Unusual Event	0020	0046	26
4/29/84	Unusual Event	2247	2307	20

^a Elapsed time from declaration to IESDA notification.

^b Based on LD log entry.

IESDA indicated that it had not been notified of the June 10, 1983 Unusual Event declaration. The only indication in the licensee's records that IESDA had been contacted regarding this event, which involved a technician being sent to a local hospital for treatment of eye contamination, was an entry in the LD's log that indicated IESDA was informed that the Unusual Event had been terminated. As evident from this table, the licensee's capability to initially notify IESDA had improved beginning in August, 1983, even before implementation of revisions to the notification process. However, Section IV.D.3 of Appendix E requires the licensee to have the capability to notify offsite agencies within 15 minutes of an emergency declaration. Even though notification times have been reduced, the licensee has still not met this 15 minute requirement. The licensee's records for the march, 1984 event declaration indicated that the LD received the NARS form information approximately fourteen minutes after the event had apparently been classified. Available licensee records indicated neither the exact time that the NDO was contacted nor the exact time IESDA was finally notified. IESDA's records indicated that the latter time was 0046 hours. This failure to demonstrate a capability to notify offsite agencies within 15 minutes of emergency declaration is an item of noncompliance. (373/84-12-01)

4. Emergency Detection and Classification

The inspectors reviewed the LaSalle Annex to the GSEP; Emergency Plan Implementing Procedure (EPIP) LZP-1110-1, Station Director/Acting Station Director Implementing Procedure; procedure LZP 1200-1, Classification of

GSEP Conditions; and other relevant procedures. Five SEs were also given walkthoroughs to ascertain their abilities to recognize conditions which would result in activation of the GSEP. The inspectors also reviewed the Station's Emergency Action Levels (EALs), as contained in the LaSalle Annex and LZP 1200-1, and found them to be identical in both documents and consistent with the guidance of NUREG-0654, Revision 1. The inspectors noted that words such as "and", "or", "all", "with", and "without" were used in various EALs to define single or multiple conditions which had to be satisfied for the EAL to be an appropriate description of the abnormal situation. However, the licensee did not highlight these key words in a consistent manner throughout the EALs. In some cases, these words were underlined and in other cases they were not highlighted in any manner when used to link multiple conditions within the EAL.

The emergency classifications described in both the GSEP and EIPs are as follows: Transportation Accident, Unusual Event, Alert, Site Area Emergency, and General Emergency. These EALs addressed both inplant conditions as well as onsite and offsite radiological conditions. Procedure LZP 1110-1 described the Station Director's prioritized responses upon declaration of each of these classifications. The SE, who is on shift 24 hours per day, functions as Acting Station Director upon declaring an emergency. LZP 1110-1 clearly indicated that the Acting Station Director has the responsibilities of classifying an event, ensuring that required offsite notifications are accomplished, and making any protective action recommendations until properly relieved by the Station Director. The inspector also reviewed several Operating and General Abnormal procedures (LOA and LGA series, respectively) and determined that the user was referred to the GSEP and EIPs for event classification, as appropriate.

Five SEs were interviewed to determine their abilities to classify several emergencies and to initiate onsite and offsite notifications. In general, the SEs exhibited good familiarity with relevant EIPs and the EALs; however, one SE had temporary difficulty in choosing between a Site Area and a General Emergency EAL since he apparently did not notice a change from the word "or" to "and" in the descriptions of these EALs.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following item should be considered for improvement:

- Key words, such as "or", "and", and "with" should, when utilized to link conditions in EALs, be highlighted in a consistent manner to facilitate their recognition.

5. Protective Action Decisionmaking

The SE, as Acting Station Director, has complete authority over the initial operation of the onsite emergency organization, including making protective action recommendations to offsite agencies. The Technical Support Center's (TSC's) Station Director or Emergency Operations Facility's (EOF's) Recovery Manager would relieve the SE of protective action decisionmaking responsibility after either facility would become operational. Based on walkthroughs with five SEs, it was evident that all were adequately

aware of their responsibility for issuing an offsite protective action recommendation until properly relieved; were readily able to locate procedural guidance for formulating the recommendation, as contained in Attachment A to LZP 1200-1; and could utilize this guidance to formulate a recommendation. One SE did, however, exhibit minor difficulty in reading Attachment A to LZP 1200-1, which is a reduced-sized reproduction. Guidance in LZP 1200-1 clearly indicated that a protective action recommendation must be made for any General Emergency classification and that recommendations would include all regions within a two mile radius of the Station and at least three, 22.5 degree sectors for downwind distances from two miles out to at least five miles from the Station.

The inspector also reviewed LZP 1370-1, Rescue, to determine who could authorize radiation exposures above 10 CFR 20 limits for life-saving situations. This procedure contained appropriate guidance regarding volunteer selection and briefings for such rescue efforts; however, this procedure also instructed the user to secure, whenever possible, the prior approval of the Station Superintendent, CECO Medical Director, and Rad/Chem Supervisor before exposing the rescue team to whole body doses up to 75 rem. The procedure does not, however, provide guidance regarding actions to be taken under life-saving circumstances when one or more of the aforementioned personnel cannot be quickly reached.

As indicated in paragraph 2 of this report, the licensee has revised LZP 1110-1 and Security Post Instruction LPI-117 to ensure that assembly/accountability activities are completed prior to any evacuation of non-essential onsite personnel and to better ensure that emergency response personnel are not denied ingress to or egress from the Protected Area while assembly/accountability activities were still in progress.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following items should be considered for improvement:

- . The copy of Attachment A to LZP 1200-1 that is available in the Control Room's EPIP binder should be replaced by a more legible copy.
- . LZP 1370-1 should provide additional guidance regarding actions to be taken under life-saving circumstances when the Station Superintendent, CECO Medical Director, and Rad/Chem Supervisor are not all available to approve rescue team radiation exposures.

6. Notifications and Communications

The licensee's provisions for accomplishing initial notifications to offsite support agencies are described in Section 6.0 of the GSEP and LaSalle Annex and in procedure LZP 1310-1, Notifications. Notifications are normally accomplished using the NARS system linking the licensee's Control Room, TSC, and EOF with the Illinois Department of Nuclear Safety, IESDA, and the counties' EOCs for Grundy and LaSalle Counties. Should NARS become inoperable, backup telephone numbers for normal and off-hours have been provided for appropriate governmental agencies in the GSEP Telephone Directory, LZP 1310-1,

and LZP 1700-1. The inspectors determined that the NARS and other dedicated communications lines were installed in the onsite emergency response facilities and the EOF, as described in the GSEP and LaSalle Annex. A sampling of dedicated lines were tested and found to be operational. Changes to the NARS form and message flowpath, intended to better ensure that initial notifications are completed in a more timely manner, are described in Paragraph 3 of this report. The revised NARS form, adequate copies of which were readily available in the Control Room and TSC, contained sufficient information to satisfy criterion E.3 of NUREG-0654, Revision 1.

The inspector examined monthly communications drill records for the period December, 1983 through April, 1984. Dedicated communications line tests have been conducted on the fourth Tuesday of each month. As a result of an internal audit finding regarding the adequacy of recordkeeping and completeness of some records, these monthly tests are no longer accomplished per the somewhat confusing procedure LOS-CQ-MI. Beginning in March, 1984, appropriate tests have been accomplished and adequately documented per procedure LZP 1550-12.

The licensee's prompt notification (siren) system was as described in Section 6.0 of the LaSalle Annex. Siren system activation has been tested on the first Tuesday of each month. Should equipment malfunctions be identified during these tests, or be reported to local officials at other times, these officials would contact the licensee's contractor who is on call 24 hours per day. The contractor has been authorized to initiate repairs without prior licensee approval. In addition to emergency repairs, the contractor performs periodic preventive maintenance on each siren and provides the licensee with semi-annual, comprehensive system maintenance reports. The inspector reviewed the November, 1983 report and found that it contained adequately detailed information regarding the scope and details of recent maintenance activities.

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

7. Changes to the Emergency Preparedness Program

The inspector reviewed the licensee's records for distribution of the GSEP and EIPs. The GSEP and LaSalle Annex have not been revised since the previous inspection. Thus, no changes have been made to the emergency organization's structure. The inspector verified through documentation review that the names and telephone numbers of emergency organization personnel and offsite support agencies are reviewed and updated quarterly by the GSEP Coordinators.

The inspector discussed the licensee's methods for accomplishing a procedure revision and for distributing revised or new EIPs with the Office Supervisor. The inspector also reviewed administrative procedure LAP 820-2, Station Procedure Preparation and Revision. The inspector concluded that no changes to the acceptable administrative mechanism for accomplishing and distributing EIPs had taken place since the last routine inspection.

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

8. Shirt Staffing and Augmentation

The minimum shift staff, outlined in Table 4.2.2 of the GSEP, meets the criteria of Table B-1 of NUREG-0654, Revision 1. Attachment A of procedure LZP 1320-1, Augmentation of Plant Staffing, contained the licensee's provisions for augmentation of the onsite emergency organization for the various emergency classifications. Attachment B of this EPIP contained the call tree utilized to activate appropriate members of the Station Group (Technical Support Center Directors), as well as communicators, technical staff specialists, and Rad/Chem technicians. The names of station personnel listed under each call tree position have been prioritized based on their estimated travel times from residences to the station. Procedure LZP 1700-1 consisted of excerpts from the GSEP Telephone Directory that were applicable to the LaSalle Station. Procedure LZP 1700-2 contained a comprehensive listing of all station personnel names, addresses, and telephone number information. Telephone number and/or residence data provided in the aforementioned procedures are updated quarterly, utilizing the Station's centralized employee records system.

The inspector reviewed records of off-hours staff augmentation drills conducted on June 22 and December 29, 1983, and on May 6, 1984, in accordance with the semi-annual GSEP commitment. The records indicated the persons contacted, times contacted, and estimated times of arrival onsite. Although these records were sufficiently detailed to indicate that the augmentation goals of Table B-1 of NUREG-0654, Revision 1, had been met, the inspectors noted that the overall quality of the documentation had deteriorated compared to that for a November, 1982 augmentation drill. Specifically, the 1983 and 1984 records contained no critique comments regarding whether or not the drills were considered successful or whether there were any corrective actions considered or taken as a result of drill results. The inspectors also noted that the licensee had no procedure which specifically addressed how to conduct and document an off-hours staff augmentation drill.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following items should be considered for improvement:

- . Off-hours staff augmentation drill records should include comments regarding the success or failure of the drill and should include provisions for documenting any corrective actions recommended and/or implemented.
- . The licensee should proceduralize how to conduct and document off-hours staff augmentation drills.

9. Knowledge and Performance of Duties (Training)

The inspectors reviewed the licensee's emergency preparedness training program, with emphasis on aspects which have changed since the 1983 routine inspection. The licensee's Production Training Center (PTC) has retained overall responsibility for ensuring that all badged station personnel receive adequate initial and requalification training on the GSEP and station specific Annex, plus ensuring that appropriate personnel complete additional training on specialized emergency response positions. Actual training sessions were either conducted by PTC staff, the station's Training Department, or the station's Rad/Chem Department, depending on several criteria such as whether the subject material was generic or site specific, initial or requalification, or related to the onsite or offsite emergency organization.

At the LaSalle Station, proficiency in an assigned GSEP director position has been maintained primarily through annual required reading of relevant procedures and participation in drills and/or the annual exercise. Training seminars would be conducted if training department staff concluded that such special sessions were the most effective means to ensure training had been completed on specific aspects of the emergency preparedness program. Training Department personnel stated that they soon planned to implement a periodic emergency preparedness reading file, which would include EIPs which they determined had been significantly revised. Associated with each procedure placed in the file would be a brief summary describing what portions of the procedure had been revised.

PTC staff have been developing training modules common for these emergency organization positions: Environmental/Emergency Coordinator, Environmental Director, and Environs Director. In its present stage of development, this training program contained eight modules. This training program was projected to be in final form by October, 1984 and to be implemented by about January, 1985. The PTC was also developing revised training modules on Revision 4 to the GSEP, which would be finalized and implemented after issuance of this revision.

The inspector examined the Training Department's records for a sampling of individuals assigned Station Group positions and determined that all appropriate training had been completed by these individuals within the last twelve months. Since the last inspection of the emergency preparedness training program, the staff had developed a more detailed GSEP training matrix which clearly described the specific EIP training required of each position in the onsite emergency organization. The inspectors' determinations regarding the abilities of SEs and others assigned specific emergency response duties are provided in Paragraphs 4, 5, and 10 of this report.

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

10. Dose Calculation and Assessment

The licensee's dose calculation and assessment methodologies were examined, as presented in the Environmental Director (ED series) procedures, which were maintained in the TSC and EOF. Among topics addressed in ED series

procedures were quantifying gaseous and liquid release rates; determining source terms from field team survey data; and acquiring current and forecast meteorological information. Dose calculation and assessment methodologies ranged from rapid, conservative estimates employing gross activity source terms and worst case meteorology, to models accommodating nuclide-specific source term and real-time meteorology inputs, with options available for plume tracking and estimating lake breeze effects. The dose calculation methods were computerized with manual backup capabilities. Computerized models could be run onsite utilizing the Station's Prime Computer or via telephone modem link to an identical computer located at the licensee's corporate offices.

The inspector conducted walkthroughs with Station personnel assigned roles of Environmental/Emergency Coordinator, Environmental Director, and/or Rad/Chem Director. During these walkthroughs, in which dose assessment activities were emphasized, these individuals demonstrated adequate understandings of the use of the computerized dose assessment programs, as well as familiarity with the TSC's data acquisition terminals on which the programs were accessed. During these walkthroughs, the inspector noted that a computerized menu of ED series procedures did not correspond to certain procedures found in the ED procedures manual. The former listed ED procedures 5A, 5B, 9A, 9B, 16A, 16B, and 16C while the procedures manual listed only procedures ED-5, ED-9, and ED-16. While reviewing procedure ED-24, the inspector noted that reference was made to ED-4, Calculation of Iodine Release Rate from Field Air Sampler Data, as the source of instructions for acquiring wind speed data, although this reference was in error.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following items should be considered for improvement:

- . The computerized menu of ED series procedures should be compared to current ED procedures to ensure that the menu is accurate.
- . The incorrect reference in procedure ED-24 to ED-4 should be deleted and replaced by a reference to the correct ED series procedure.

11. Public Information Program

The inspector determined through interviews and documentation review that an emergency planning booklet, which describes what to do in case of an emergency at the LaSalle County Station, has been developed and distributed to permanent residences and transient population gathering places within the plume exposure Emergency Planning Zone (EPZ). The booklet addressed what to do if the prompt notification system is activated, points of contact to receive additional information, how handicapped and others with special needs could alert IESDA of these needs prior to an emergency situation, and general information about nuclear power plants and radiation. The inspector determined that these booklets were last distributed in December 1983 and January 1984, and that the licensee has provided for an annual distribution. Mailing lists for these booklets were developed from utility bill mailing lists both for residences and public places.

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

12. Licensee Audits

The inspector reviewed Quality Assurance (QA) Department audit records related to the station's emergency preparedness program; drill records; records of training given offsite support agency representatives; and discussed provisions for conducting audits, tracking drill weaknesses, and evaluating GSEP activations with cognizant personnel.

An annual "onsite" audit of the program is conducted by corporate QA personnel based at the station, utilizing an audit matrix designed to assure that all aspects of an audit required by 10 CFR 50.54(t) were addressed. The inspector examined the records of onsite Audit 1-83-46, performed on October 25-31, 1983. The audit addressed a number of areas, including the GSEP and Annex, drills and exercises, interface with offsite support agencies, emergency communications tests with offsite agencies with respect to 10 CFR 50, Appendix E requirements, Letters of Agreement, and inventories of various emergency equipment storage locations. Audit records were complete and indicated that the single finding and two observations had been closed. Regarding communications equipment tests, the licensee's auditors determined that records of the monthly tests were improperly filed, occasionally appeared incomplete, or had not always been properly reviewed. An Action Item Record (AIR) was issued, ultimately resulting in the generation of a simplified procedure (LZP 1550-12) to replace the procedure previously utilized (LOS-CQ-MI), and that acceptable recordkeeping was accomplished for checklists on which the monthly communications tests were documented. The inspector reviewed the audit matrix for the 1984 onsite audit, scheduled for late May, 1984, and determined that it contained provisions for audit questions derived directly from 10 CFR 50, Appendix E, in addition to the areas addressed in previous years' matrices.

In addition to the onsite audit, an annual "offsite" audit of the station was performed by QA personnel not based at the station. This audit encompassed a number of areas, including emergency preparedness. The inspector examined Offsite Audit II-83(01), conducted September 13-16, 1983. This audit contained twenty-six questions related to emergency preparedness, including the adequacy of EAL review with State and local agencies, maintenance of the prompt notification system, and internal critiques of drills and exercises. The inspector determined that the single audit finding and three observations related to emergency preparedness had been closed.

As indicated in Paragraph 2 to this Inspection Report, since the last routine inspection the licensee's corporate staff has issued additional guidance regarding the retention and adequacy of drill and exercise records, and that the station has responded to this guidance by developing and implementing procedure LZP 1530-1, Exercises and Drills, which addressed records retention, critiques, and interface with the station's AIR tracking system. The inspector examined records of GSEP drills and exercises available in Central Files and determined that all drills and exercises had been conducted

in accordance with regulatory requirements and commitments in the GSEP. The inspector determined that the annual assembly drill commitment for 1983 was fulfilled during that year's annual exercise, and that internal critique comments regarding the onsite assembly were included among the licensee's exercise critique comments. Corrective actions resulting from NRC comments on the assembly were tracked on the AIR system. Since implementation of LZF 1530-1, no drill had been conducted which required corrective action as tracked using the AIR system. In general, 1983 drill records were adequately detailed; however, as stated in Paragraph 8 of this inspection report, documentation of off-hours staff augmentation drills should be improved.

The inspector examined records related to training offered to offsite support agency representatives during 1983. The licensee conducted a training session, which included an EAL review, on August 25, 1983, attended by representatives of State and local offsite support organizations within the plume exposure EPZs of the LaSalle and Dresden Stations. The emergency classes were reviewed, EAL examples for each class were discussed, as were offsite organizations' expected responses for these emergency classes.

The inspector discussed the "Actual GSEP Events Review Checklist" with the station's GSEP Coordinators. This checklist had recently been developed in order that all information regarding GSEP activations, especially data related to the timeliness of initial offsite notifications and the completeness of relevant records, could be promptly compiled and evaluated by station and corporate GSEP staffs. Regarding the implementation of this useful checklist at the LaSalle Station, the GSEP Coordinators stated that they might not be promptly made aware of actual GSEP events, due to their other duties in the Rad/Chem Department, and the fact that Control Room records, including SE's logs and NARS forms, were being routed through the Operations Department and then to Central Files and Station archives. The GSEP Coordinator indicated that the effectiveness of the new checklist was dependent, in part, on their being notified of an actual GSEP activation prior to relevant records reaching the aforementioned storage locations.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following item should be considered for improvement:

- . The licensee should develop and implement provisions to ensure that the station's GSEP Coordinators are promptly informed of actual GSEP activations, to better ensure that the "Actual GSEP Events Review Checklist" can be implemented as intended.

13. Exit Interview

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on May 11, 1984. The inspectors summarized the scope and preliminary findings of the inspection. The licensee agreed to review and consider the improvement items discussed.