#### U.S. NUCLEAR REGULATORY COMMISSION

#### REGION III

Reports No. 50-266/92006(DRSS); 50-301/92006(DRSS)

Docket Nos. 50-266; 50-301

Licenses No. DPR-24: DPR-27

Licensee: Wisconsin Electric Power Company

231 West Michigan Milwaukee, WI 53201

Facility Name: Point Beach Nuclear Power Plant, Units 1 and 2

Inspection At: Point Beach site, Two Creeks, Wisconsin

Inspection Conducted: January 27-31, 1992

Inspectors:

Intermed Barger for

Approved By: J. W. Mormal Barger, Chief Emergency Preparedness Section

Inspection Summary

Inspection on January 27-31, 1992 (Reports No. 50-266/92006(DRSS); 50-301/92006(DRSS))

Areas Inspected: Routine, announced inspection of the following aspects of the Point Beach Nuclear Power Plant's Emergency Preparedness (EP) program: licensee actions on previously identified items (IP 82301); actual emergency plan activations (IP 82701); and operational status of the EP program (IP 82701). The inspection involved two NRC inspectors. Results: No violations, deficiencies or deviations were identified. Emergency response facilities, equipment and supplies have been maintained in a very good state of operational readiness. Several facility and equipment refinements have been completed, while other upgrades were well underway. Additional staff have been assigned to maintaining the program, including its training activities. The emergency response organization's staffing levels ranged from adequate to very good for key and support positions. The EP training program was well organized and was being updated to reflect plan and implementing procedure changes. Good progress has been made on resolving several concerns identified during the 1991 exercise; however, resolution of these concerns would involve successful demonstration of corrective actions during the March 1992 exercise.

#### DETAILS

#### 1. Persons Contacted

G. Maxfield, Plant Manager

R. Seizert, Regulatory Services Manager

R Chojnacki, Emergency Preparedness Coordinator R. LaViolette, Emergency Preparedness Specialist

L. Epstein, Emergency Preparedness Training Instructor

T. Malanowski, Licensing Project Engineer F. Flenipe, Regulatory Services Specialist

The above licensee representatives attended the January 31, 1992 exit interview. The inspectors contacted other licensee representatives during the inspection.

# 2. Licensee Action on Previously Identified Items (IP 82301)

(Open) Open Item No. 50-266/90006-02: During the 1990 Emergency Preparedness (EP) exercise, the licensee was too slow to obtain and analyze environmental samples to confirm the existence of the postulated offsite release.

The licensee established a committee to review the entire offsite sampling process, including: the availability of suitable vehicles for survey teams; procedure adequacy; survey kits' adequacy; and the locations of equipment used for analyzing environmental samples. The overall goal was to better ensure timely collection and analysis of environmental samples.

The licensee was evaluating which plant vehicles would be best suited for field survey team use, or whether one or more new vehicles should be procured. A predesignated vehicle would probably also be available for personnel performing routine or ironmental monitoring program activities. Several field team procedure revisions were planned for issuance in early February. A portable multi-channel analyzer and associated computer and power pack equipment were purchased. Familiarization training had begun on this equipment. The equipment would be transported from the Technical Support Center's (TSC's) laboratory to the nearsite Emergency Operations Facility's (EOF's) laboratory. Additional "hands-on" training on the new equipment was planned for completion prior to the March 1992 exercise.

This item will remain open pending the successful demonstration of the capabilities to collect and analyze environmental samples in a timely manner.

(Open) Open Item No. 50-266/91004-01: During the 1991 EP exercise, decisionmakers exhibited confusion on the proper event classification based on the current status of each of the three fission product barriers.

The December 1991 revision to the licensee's emergency plan included several changes to the plant's Emergency Action Levels, some of which were intended to simplify event classification based on the loss of integrity of one or more fission product barriers. NRC approved this plan revision in January 1992. The TSC was equipped with a small status board for posting information whether or not each fission product barrier is considered intact or breached.

This item will remain open pending the demonstration of correct and timely event classifications during an NRC-evaluated exercise.

## 3. Emergency Plan Activations (IP 82701)

There have been no actual activations of the licensee's Emergency Plan since the previous inspection of the licensee's EP program.

No violations or deviations were identified.

## 4. Operational Status of the Emergency Preparedness (EP) Program (IP 82701)

## a. Plant and Implementing Procedures

By letter dated January 10, 1992, NRC documented its approval of the December 1991 revision of the Point Beach Nuclear Power Plant's Emergency Plan.

Copies of new or revised Emergency Plan Implementing Procedures (EPIP's) are reviewed on an ongoing basis by the NRC Region III EP analyst assigned to the Point Beach Nuclear Power Plant. No significant inconsistencies between the current plan revision and the EPIP's were identified since the previous inspection.

The inspectors examined the EP aspects of the licensee's Control Room (CR) staffing provisions with respect to the November 26, 1991 NRC Information Notice No. 91-77, "Shift Staffing at Nuclear Power Plants." Staffing provisions were discussed with an Operations Review Group Engineer who was assigned to internally evaluate this Notice by March 1, 1992. Discussions were also held with the EP Coordinator and a former Duty Shift Superintendent (DSS). Relevant EPIP's were also reviewed, as was Abnormal Operating Procedure (AOP)-10A, "Control Room Inaccessibility." This AOP addressed the evacuation of the CR.

After the onshift DSS declares an emergency, a security shift commander would be responsible for transmitting an initial notification message to State and county officials using the National Warning System (NAWAS) telephone located in the Technical Support Center (TSC). The onsite Emergency Response Organization (ERO) includes several Duty and Call Superintendents (DCSs), whose functions include initially notifying NRC officials, activating the onsite ERO and serving as a backup to the security shift commander for State and county initial notifications. The onshift Duty

Technical Advisor's (DTA's) functions also include offsite agency notifications, as may be necessary. In the event of an onsite fire, the onshift Duty Operating Supervisor (DOS) would lead the fire brigade, while one or more non-licensed, auxiliary operators would be among the members of the brigade. Pending review of the licensee's evaluation of Information Notice No. 91-77, the inspectors concluded that there is reasonable assurance that onshift personnel can simultaneously perform event classification, offsite notifications, ERO activation, and fire brigade response activities.

No violations or deviations were identified.

#### b. Emergency Response Facilities (ERFs), Equipment and Supplies

The inspectors toured the Control Room Simulator (CRS), Technical Support Center (TSC), Operational Support Center (OSC) and the nearsite Emergency Operations Facility (EOF). Based on these tours and a review of records of periodic emergency equipment tests and supplies inventories, all ERFs and emergency equipment and supplies were determined to have been maintained in a good state of operational readiness since the July 1991 inspection. Current copies of the emergency plan and EPIPs were readily available in the ERFs.

The licensee's CRS is a dual unit simulator. The licensee indicated that the CRS was successfully demonstrated in a December 1991 casualty control drill and would be utilized in the March 1992 EP exercise.

The TSC and OSC shared the same emergency ventilation system. This system has undergone an annual inspection and testing since at least 1986. System components that were inspected by a vendor during 1991 included: ductwork; movable components; filter housings; heating coils; local instrumentation; prefilters; high efficiency filters; and charcoal filters. The ventilation system also passed leakage and differential pressure testing in 1991. A sample from its charcoal filter bed was also tested to ensure that the charcoal's absorption efficiency was at least 90 percent.

The quality of the TSC's and OSC's status boards were improved. One small board was devoted to posting the current status of each fission product barrier. Large lettering was mounted on one wall of the TSC to remind key staff of priority tasks.

The nearsite EOF was located in the Site Boundary Control Center (SBCC) building. The EOF was not equipped with an emergency ventilation system. In the event that personnel would have to evacuate the EOF due to habitability concerns, basic EP responsibilities would first be transferred to senior personnel in the TSC and the Corporate Emergency Center (CEC). In 1990, the Commission approved the current CEC, which is located in Milwaukee.

Wisconsin, as the licensee's Backup EOF. Direction and control of the licensee's offsite environmental monitoring teams would be also transferred to TSC staff, pending the relocation of evacuated EOF staff to a predesignated offsite facility owned by the Wisconsin Power Company and located near the Kewaunee Nuclear Power Plant.

The TSC, OSC and EOF were equipped with iodine and noble gas radiation monitoring systems which have been calibrated annually. The most recent calibrations of the system serving the TSC and OSC plus the system serving the EOF were performed during the fourth quarter of 1991. The TSC and OSC workspaces were also equipped with two area radiation monitors which have been calibrated annually and functionally tested monthly. The EOF had one area radiation monitor which has been calibrated and functionally tested at the same frequencies as those located in the TSC and OSC.

The licensee was working with State and county officials to finalize a new location for the Joint Public Information Center (JPIC). The proposed location was at the Holiday Inn located in Manitowoc, Wisconsin. The licensee and offsite officials planned to utilize this new JPIC during the march 1992 exercise.

The licensee has purchased a DIALOGIC emergency notification system for its key emergency responders. This system is capable of interfacing with an improved pager system, which was also purchased. Implementation of the DIALOGIC system and improved pagers was planned to occur in February 1992.

No violations or deviations were identified.

#### c. Organization and Management Control

The EP Coordinator and both EP Specialists reported to the Plant Manager through the Regulatory Services Manager. The current coordinator was appointed in July 1991 and had been an EP specialist several years earlier. The current specialists had been appointed in May 1990 and July 1991. A second, full time EP Instructor was appointed in mid-1991. Both instructors reported to the Plant Manager through the Training Manager. In recent weeks, however, the individual recently reassigned as the Training Manager was also serving as the Regulatory Services Manager, pending the selection of another person for the latter position. The appointments of the current coordinator, second EP specialist and the second EP Instructor satisfied an earlier NRC concern regarding EP staffing adequacy.

The ERO's staffing levels ranged from adequate to good for key and higher level, technical support positions. At least three persons were identified for such positions. Six senior managers were identified as Duty and Call Superintendents (DCSs). Upon activation

of the ERO, three DCSs would fill the following key positions: Plant Operations Manager; Site Manager; and Technical Support Manager. Staffing levels were very good for the Duty Technical Advisor (DTA) position; communicators; inplant repair teams; chemistry teams; radiation survey teams; status board plotters; and clerical support personnel. The 15 DTAs were trained to fill the following emergency response positions: Shift Technical Advisor; supervisor of communicators in the TSC; and the TSC's lead communicator to CR personnel.

Semi-annual, off-hours drills were conducted during 1991 to successfully demonstrate the capability to augment onshift personnel in a timely manner. The February 1991 drill involved key and support staffs, while the November 1991 drill involved only key personnel who had pagers. Both drills did not require persons contacted to actually report to their assigned emergency response facilities. Instead, these persons were required to provide estimated time of arrival data, which were then compared to the response time commitments. Although adequate numbers of key persons were contacted during the November 1991 drill and had indicated their abilities to report onsite in a timely manner, an abnormally large number of key persons could not be reached by pager or by telephone for a variety of reasons. As indicated in Section 4.b of this report, the licensee planned to implement an automated DIALOGIC calling system and improved pagers during February 1992 as one corrective action in response to this less than fully successful augmentation drill performance.

Records indicated that all Letters of Agreement (LOAs) with offsite support organizations were current and specific regarding the natures of the anticipated support. As indicated in Section 4.b, the licensee, State, and county officials planned to utilize a new JPIC in the March 1992 exercise. An LOA with the management of the facility which would include the new JPIC, was under development during this inspection.

Records indicated that the licensee has met bimonthly with Manitowoc County, Kewaunee County and Kewaunee Nuclear Power Plant representatives on items of mutual interest. Meetings with State officials have apparently been less frequent during 1991.

No violations or deviations were identified.

## d. Training

Two full time EP Instructors were responsible for the annual position specific training of ERO members, including: licensed operators; chemistry and health physics (HP) technicians, who may be assigned to post accident sampling teams, and Corporate Emergency Center staff. Support was provided by other work groups for developing training materials and/or conducting annual training for such highly specialized topics as core damage assessment and the use of equipment for analyzing environmental samples.

In addition to annual, position specific training and EP program information provided in unescorted access training. Point Beach Nuclear Power Plant personnel have been required to complete biennial orientation training on such EP program topics as: the locations of emergency equipment, response facilities and supplies; response to plant alarms; onsite accountability provisions; and radiation exposure limits for emergency works. Biennial orientation training on the EP program for licensee employees not based at the site was somewhat less detailed.

An individual was considered to be "disqualified" for an assigned ERO position if he/she had not successfully completed annual training within a 15 month period or biennial training within a 30 month period. The EP instructors have utilized quarterly internal memos to inform the Plant Manager and the EP Coordinator of infrequent cases where an individual had become "disqualified" as a member of the ERO. Records indicated that the current ERO roster had good numbers of currently trained personnel to fill all key and support position to better ensure 24-hour staffing capability. Adequate corrective actions were in progress to requalify several persons whose ERO training had become overdue in January 1992, as had been identified in the latest internal memo to the Plant Manager and the EP Coordinator.

The EP Instructors have utilized their own computerized training tracking system to better ensure that ERO members' training remained up to date. An instructor indicated that EP training records may be incorporated in another program utilized to track plant employees' other non-EP types of required training.

The following sample of EP lesson plans were reviewed: LP 1928 (accident assessment by DSS and DTA personnel); LP 1929 (stack sampling and dose assessment); LP 1931 (core damage assessment); IM 0011 (biennial emergency plan overview for plant employees); IM 0012 (biennial emergency plan overview for corporate-based employees); and LP 0369 (event classification, offsite notifications and protective actions). These lesson plans' overall quality was good. Their contents were consistent with the plan and implementing procedures.

Periodic training to appropriate personnel on core damage assessment was becoming overdue. At the January 31, 1992 exit interview, the licensee assured the inspectors that the training materials would be completed and that the training would be conducted prior to the March 1992 exercise.

Two post accident sampling drills were conducted during the inspection. One drill involved containment atmosphere sampling, while the other drill involved reactor coolant sampling. Each drill was observed by one inspector. Participants included two very experienced chemistry technicians and one HP technician, who

apparently had not previously participated in these drills. Drill activities included: refresher training on the relevant sample collection and analysis procedure; ALARA concerns; dosimetry and protective clothing needs; actual sample collection; and sample transport to the onsite laboratory where analyses were performed. Participants successfully tested "ear microphone" communications devices to facilitate communications with each other and CR personnel.

An EP instructor conducted both post accident sampling drills. The instructor exhibited good knowledge of the procedures and equipment. He was responsive to the participants' questions and suggestions. Participants demonstrated good ALARA and contamination control techniques during the sample collection, transport and analysis processes.

Records review indicated that annual training to local media representatives, local hospital staff and local ambulance service personnel had been conducted during 1991. Appropriate State and local officials had also been provided with copies of the plant's current emergency action levels, which could be discussed as necessary.

Records also indicated that all required emergency plan drills and the annual exercise had been conducted and critiqued during 1991. The EP staff effectively utilized a computerized system to track action items identified during program audits, drills, exercises and training sessions. The tracking system also was used to better ensure that periodic tasks, such as emergency supplies inventories and equipment tests, would be performed as procedurally required.

No violations or deviations were identified.

#### e. Audits and Surveillances

As indicated in Inspection Reports No. 50-266/91016(DRSS) and 50-301/91016(DRSS), the licensee conducted its annual audit of the EP program in April 1991; however, the audit did not include an assessment of the adequacy of the licensee's interface with State and local governments, as is required by 10 CFR 50.54(t). Records indicated that the licensee satisfied this annual regulatory requirement by conducting a well-detailed surveillance in August 1991 on a variety of offsite interface topics. Copies of this surveillance were provided to appropriate State and county officials.

Records also indicated that the EP staff and EP training instructors had made good progress on resolving the concerns identified in the April 1991 annual audit.

No violations or deviations were identified.

# 5. Exit Interview (IP 82301, IP 82701)

On January 31, 1992, the inspectors met with those licensee representatives identified in Section 1 to present and discuss the preliminary inspection findings. The licensee indicated that none of the matters discussed were proprietary in nature.

The licensee was informed that emergency response facilities, equipment and supplies have been maintained in a very good state of operational readiness. Several facility and equipment refinement: were completed, while other upgrades were well underway. Additional staff have been assigned to maintaining the program, including its training activities. The emergency response organization's staffing levels ranged from adequate to very good for key and support positions. The EP training program was well organized and was being updated to reflect plan and implementing procedure changes. Good progress was made to resolve several concerns identified during the previous EP exercise; however, resolution of these concerns would involve successful demonstration of corrective actions during the March 1992 exercise.