U.S. NUCLEAR REGULATORY COMMISSION REGION I

Report No.	50-244/84-08			
Docket No.	50-244			
License No	. DPR-18	Priority	- Categor	y <u>C</u>
Licensee:	Rochester Gas and	Electric Corporat	ion	
	49 East Avenue			
	Rochester, New Yor	rk 14649		
Facility N	ame: R. E. Ginna M	Nuclear Power Plant		
Inspection	At: Corporate Hea	adquarters and Nucl	lear Power Plant	
Inspection	Conducted: April	23-27, 1984		
Inspectors	Ira Comen	redness Specialist	6/15 dat	184
Approved by	al nh		6/15 date	184

Inspection Summary: Inspection on April 23-27, 1984 (Report No. 50-244/84-08)

Areas Inspected: Routine, unannounced inspection of emergency preparedness including Emergency Detection and Classification, Notifications and Communications, Knowledge and Performance of Duties, Dose Calculation and Assessment, Post Accident Measurements and Instrumentation, Public Information Program, Licensee Audits and a review of open items from a previous appraisal. The inspection involved 68 hours onsite by two NRC region-based inspectors.

Results: One apparent violation was identified; failure to provide Emergency Plan Training to three response personnel. In addition, seven areas of concern were identified that should be considered for improvement.

Details

1. Individuals Contacted

*W. Backus, Acting Operations Supervisor

R. Burt, Training Instructor

*E. DeMeritt, Corporate Emergency Planner

*E. Edgar, I and C Supervisor

*D. Filkins, Mgr Health Physics and Chemistry

D. Horning, Shift Supervisor

D. Klemz, Shift Supervisor

*R. Kober, Vice Pres. Elec. and Steam Prod.

*R. Morrill, Mgr. Training

F. Mis, Healthy Physics Technician
*B. Quinn, Health Physics Technician

M. Sexton, Shift Supervisor

*B. Snow, Supt. Nuclear Production

*S. Spector, Asst. Supt.

R. Sullivan, Mgr. Public Relations

*Denotes attendance at the exit interview.

2. General

During the period November 2-13, 1981, an NRC team conducted an appraisal of the State of Emergency Preparedness at the R. E. Ginna Nuclear Power Plant. As a result, the NRC report identified 32 items (Appendix A) requiring resolution in order for the licensee to achieve an adequate state of emergency preparedness and 28 improvement items (Appendix B). During the periods April 18-22 and November 15-18, 1983 follow-up inspections indicated that 4 Appendix A items remained open. During this inspection it was noted that the 4 Appendix A items remained open however revised completion dates were negotiated and are shown in paragraph 3.

3. Licensee Action on Previous Inspection Findings

(1) 3.01 (Open) 50-244/81-22-04. Establish an emergency organization which provides for all emergency functions needed during initial, intermediate, and final phases of augmentation. Revise the Emergency Plan to include a description of the organization and update implementing procedures to be consistent with the organization. The description shall include sufficient detail to define the command hierarchy; specify its structure, reporting chains, and interrelationships at any phase of augmentation; and include supervisory as well as nonsupervisory elements (Appendix A, Item 2).

The inspector held discussions with licensee management and was assured that this item would be completed by May 30, 1984.

(2) 3.02 (Open) 50-244/81-22-16. Evaluate the need for; retention, transfer, storage, sampling, and analysis of highly radioactive

liquid wastes that could be generated as a result of severe accidents (Appendix A, item 9).

The inspector held discussions with licensee management and was assured that this item would be completed by May 30, 1984.

(3) 3.03 (Open) 50-244/81-22-30. Review general emergency implementing instructions to assure adequate guidance and necessary detail is provided for the emergency coordinator (Appendix A, item 13).

The inspector held discussions with licensee management and was assured that this item would be completed by May 30, 1984.

(4) 3.04 (Open) 50-244/81-22-40. Identify techniques to compensate for potential uncertainties associated with plume trajectories and include the technical basis as an appendix to the emergency plan (Appendix A, item 15).

The inspector held discussions with licensee personnel, reviewed the scope of work for a study and noted that a completion date will be established this summer.

4. Areas Inspected

a. Emergency Detection and Classification (IE Procedure 82201)

The inspectors conducted walk-throughs with three emergency response coordinators, reviewed pertinent sections of the emergency plan and implementing procedures. The inspectors noted that initial offsite notification procedures include criteria based on emergency action levels (EALs) for initiation of offsite notifications and for protective action recommendations. The procedures also provide for; protective actions for nonessential onsite personnel emergency event classifications which are based on the four appropriate classes, and an individual on-site to assume the role of emergency coordinator (who can promptly classify events).

Based on the above review, no violations were identified.

Notifications and Communications (IE Procedure 82203)

The inspector held discussions with licensee personnel, conducted walk-throughs covering notification procedures, observed records of offsite communication tests and drills, reviewed the content of initial emergency messages to offsite authorities and noted that the licensee maintained a capability for promptly notifying and communicating among licensee personnel and offsite supporting agencies and authorities. However, the inspector noted that notification procedures should be revised to indicate prompt notifications (See Appendix B, item 1).

Based on the above review, no violations were identified.

c. Knowledge and Performance of Duties (IE Procedure 82206).

The inspectors reviewed appropriate sections of the emergency plan and implementing procedures, held discussions with training personnel, reviewed lesson plans, quizzes, attendance records of selected personnel, conducted walk-throughs with personnel who would assume positions of emergency coordinator and dose assessment manager and noted that an emergency preparedness training program had been established. However, the inspectors noted that three licensee personnel who may be called upon to assume the position of emergency coordinator did not receive annual Radiation Emergency Plan training and have identified this matter as a violation (50-244-84-08-01). In addition a more effective emergency response could be achieved if personnel were removed from the emergency callout list if they had not received annual training (See Appendix B, item 2).

d. Dose Calculation and Assessment (IE Procedure 82207)

The inspector interviewed licensee personnel designated as "Dose Assessment Managers" to determine if dose assessment procedures could be promptly and correctly used. The inspectors noted, after completion of several walk-through dose calculations that the licensee's procedure (SC-420), "Estimating off-Site Doses" was not a very precise method for calculating off-site dose rates. The inspector found that several changes were needed in the procedure to avoid unnecessary interpolation and time consuming calculations. The inspector concluded that a computerized dose assessment method was necessary to insure a precise dose calculation and a timely protective action recommendation (see Appendix B, item 6). Also the inspectors recommend that the licensee include procedure for implementing the more refined dose assessment method currently available (MIDAS) and address the recommended model capabilities outlined in the "Atmospheric Transport and Diffusion Assessment" (see Appendix B. item 7). The inspectors found that table-top discussions were used as part of training and practical experience was emphasized in this area of the licensee's emergency preparedness program.

Based on the above review, no violations were identified.

e. Post accident Measurements and Instrumentation, IE Procedure 82208

Discussions were held with the licensee's Instrumentation and Calibration (I&C) personnel on the meteorological system and maintenance procedures. Calibration and maintenance procedures CP-250 Rev. 2 and CP-251 Rev. 0 for the Ginna station meteorological instrumentation and transmitters were reviewed; no maintenance log was kept. The primary meteorological tower site was visited and the inspector noted a trailer had been recently placed at the base of

the tower, along with a micro-wave antenna which was on the tower. The licensee indicated that no impact on the meteorological measurements was anticipated. It appears that the licensee makes daily checks of the primary meteorological measurements but, this could not be verified at the site. (See Appendix B items 3 and 4). The licensee appears to be in compliance with all calibration and preventative maintenance schedules.

The primary meteorological tower is located near the lake shore on the NW side of the plant, the instruments are well exposed but full conformance to regulatory guide 1.23 Rev. 1 siting criteria and instrument sensitivity recommendations could not be established; a complete description of the meteorological monitoring program was not readily available onsite (See Appendix B, item 5). This area will remain under inspection.

Based on the above review, no violations were identified.

f. Public Information Program (IE Procedure 82209)

The inspector held discussions with licensee personnel, reviewed publications disseminated to the public within the plume exposure pathway and noted that appropriate emergency planning information is being distributed on an annual basis.

Based on the above review, no violations were identified.

g. Licensee Audits (IE Procedure 82210)

The inspectors reviewed audit reports of activities at the R. E. Ginna plant and corporate performed during May 1982 & May 1983 and noted that the licensee has a program for identifying deficiencies and weaknesses and a means for providing appropriate corrective actions.

Based on the above, no violations were identified.

5.0 Exit Meeting

On April 27, 1984, the inspectors met with the individuals listed in paragraph 1 and summarized the scope and findings of the inspection. At no time during this inspection was written material provided to the licensee by the inspectors.