U.S. NUCLEAR REGULATORY COMMISSION

Region I

Report No.	50-333/84-10	
Docket No.	50-333	
License No.	DPR-59 Priority	Category
Licensee:	Power Authority of the State of New York	
	Post Office Box 41	
	Lycoming, New York 13093	
Facility Name:	James A. FitzPatrick Nuclear Power Plan	it
Inspection At:	Scriba, New York	
Inspection Con	ducted: <u>May 21-25, 1984</u>	
Inspectors:	J. J. Hawxhurst, Emergency Preparedness Specialist	Coffstery date
	I. Cohen, Emergency Preparedness Specialist	6/15/84 date
Approved By:	AH Cocker	6/15/84

H. W. Crocker, Chief, Emergency Preparedness date Section, DETP

Inspection Summary: Inspection on May 21-25, 1984 (Report No. 50-333/84-10) Areas Inspected: Routine, unannounced inspection of licensee emergency preparedness including followup inspection of 4 items from a prior inspection (No. 83-23); and also, routine IE inspection modules on Emergency Detection and Classification, Protective Action Decision Making, Knowledge and Performance of Duties, Dose Calculation and Assessment, Post-Accident Measurements and Instrumentation, Public Information Program, Licensee Audits and a review of the Emergency Plan. The inspection involved 58 hours onsite by two NRC region based inspectors.

Results: Of the 4 prior items of concern, one was closed and three remain open. Eight additional open items resulted from this inspection. No violations were observed.

DETAILS

1. Persons Contacted

The following licensee representatives were contacted during the inspection on May 21-25, 1984.

- * N. Avrakotos, Emergency Planning Coordinator P. Brozenich, Shift Supervisor
 * R. A. Burns, Vice President BWR Support NYPA
- * R. Chase, Information Officer
- * R. Converse, Superintendent of Power
- * M. Curling, Training Superintendent
- * D. Lindsey, Assistant Operations Superintendent R. Maki, Shift Supervisor
- * C. McNeill, Resident Manager
- * E. Mulcahey, Radiological and Environmental Service Superintendent
- * R. L. Patch, Quality Assurance Superintendent R. Schilling, Shift Supervisor
- K. Walker, Emergency Plan Training Administrator
- * A. Zaremba, Assistant Emergency Plan Coordinator
- * Denotes those present at the exit interview.
- 2. Licensee Action on Previous Inspection Findings
 - Open (50-333/83-23-01) Develop an Emergency Plan Implementing a. . Procedure for activation and operations within the TSC.

The inspector reviewed a draft procedure describing the activation of the TSC and was assured that the procedure would be completed prior to the July 1984 exercise.

Closed (50-333/83-23-02) Include the revised emergency organization b. in EAP-17, "Emergency Organization Staffing".

The inspectors reviewed EAP-17, Revision 3, dated February 1984 and noted that a revised emergency organization was described.

Open (50-333/83-23-03) Develop a method for estimating the total C. population dose.

The inspectors held discussions with the licensee concerning the means of estimating the total population dose in the event of a radiological release and were assured that a method would be described within the Emergency Plan or implementing procedure by December 31, 1984.

d. Open (50-333/83-23-04) Develop a procedure for decontaminating people shown to be contaminated upon arrival at the EOF monitoring station.

The inspectors reviewed a draft procedure EAP-24, EOF Vehicle and Personnel Decontamination and were assured that the procedure would be completed prior to the July 1984 exercise.

3. Areas Inspected

a. Emergency Detection and Classification (IE Procedure No. 82201)

The inspectors reviewed the licensee's emergency classification system, discussed the EAL's with several shift supervisors and noted that initiating conditions consisted of inplant, onsite and offsite measurable and observable events. However, the inspectors identified a number of initiating conditions which require further evaluation by the licensee (see paragraph (i), item 3). The inspectors noted that the licensee provides for having an individual onsite at all times to classify events and initiate emergency response. The inspectors conducted walkthroughs with three shift supervisors (initial emergency directors) and noted that they were able to classify emergencies in accordance with the licensee's classification of emergency conditions (EAP-2). The inspectors recommended revising EAP-1 to provide a checklist for the Emergency Director to ensure performance of major tasks (See Appendix A, Item 84-10-06).

b. Protective Action Decision Making (IE Procedure No. 82202)

The inspectors held discussions with licensee personnel (Shift Supervisors) who would have responsibilities for protective action decision making and reviewed EAP-18, Protective Action Recommendations, dated March 7, 1984. The inspectors noted that the licensee has 24-hourper-day capability to assess and to analyze emergency conditions and to make recommendations to protect the public and onsite workers. Also, the inspectors noted that the licensee included IE Information Notice No. 83-28, "Criteria for Protective Action Recommendations for General Emergencies with EAP-18".

After completion of walk-throughs with shift supervisors, the inspectors concluded that a more effective response could be provided by the licensee if additional training were given to shift supervisors in regard to protective action recommendations (See Appendix A, item 84-10-01).

Based upon the above findings, no violations were identified.

c. Notification and Communication (IE Procedure No. 82203)

The inspectors held discussions with licensee personnel, reviewed the offsite notification procedure and noted that weekly communications checks were initiated by N.Y. Warning Point and monthly communications

checks were performed by the licensee. The inspectors reviewed communication drill records and concluded that the licensee has adequate capability to promptly notify offsite authorities in the event of an emergency. In addition, there were no procedures covering continuous accountability at each of the emergency response facilities (See Appendix A, Item 84-10-08). The inspectors noted that no procedure was provided to activate and operate the AEOF (See Appendix A, Item 84-10-07).

Based on the above findings, no violations were identified.

d. Knowledge of Performance of Duties (IE Procedure No. 82206)

The inspectors reviewed Section 8.2 of the Emergency Plan, "Training of Emergency Personnel", Training and Indoctrination Procedure ITP-12, "Emergency Response Training", and personnel training records. Discussions were held with selected individuals and performance tests were examined to verify that appropriate training was provided.

The inspectors noted that the licensee updated the "Emergency Organization Assignments", Table 5.2 of the Emergency Plan annually and recommended that assignments be updated more frequently to assure that the properly trained individuals are identified (See Appendix A, Item 84-10-02). The inspectors determined a training program is established and maintained in accordance with 10 CFR 50.47(b)(15).

Based on the above findings, no violations were identified.

e. Dose Calculation and Assessment (IE Procedure No. 82207)

The inspectors reviewed Emergency Plan Section 6.2.3, "Dose Assessment Methods and Techniques", Implementing Procedures EAP-4 (Revision 3) and EAP-21 (Revision 2), and conducted walk-throughs with shift supervisors. The inspectors found that radiological doses offsite, based on current plant conditions and onsite meteorological data, could be calculated, but noted the dose estimate nomogram is difficult to work with, time consuming (~ 30 minutes/per initial calculation) and results were imprecise. Also, correction factors provided for calculating realistic release rates from plant stack and vent monitor readings were not signed or dated. The inspectors recommend implementing the computerized dose model (EAP-21) using pre-established specific initial assumption for a rapid assessment and provide specialized training to a designated individual for the initial dose calculation. Also, the inspectors identified the need for a more practical (use of computed 15 minute average values) approach to acquiring onsite meteorological data for use in dose assessment (See Appendix A, Item 84-10-03).

The inspectors noted the licensee's modified Class A Model and Meteorological Data Acquisition System (MDAS) were operable; however, the licensee plans to change computer systems and training on the current MDAS has not been completed.

Based on the above findings, no violations were identified.

f. Post-Accident Measurements and Instrumentation (IE Procedure No. 82208)

The inspectors held discussions with the licensee on the meteorological monitoring program. A complete description of the program was not included in the FSAR or Emergency Plan. The licensee agreed to provide an adequate description of the meteorological equipment and systems used for dose assessment in the next FSAR and Emergency Plan revision, respectively. The licensee (NYPA) does not maintain the meteorological monitoring system (Niagara Mohawk is providing this service) except for the transmission of data to the licensee's control room and maintenance of the backup meteorological tower.

The inspectors noted that strip chart displays of meteorological data in the control room were not properly calibrated and maintained (i.e. dates and times were off significantly on one chart, also, paper was not properly feeding). The inspectors recommended that immediate corrective action be taken and further suggested using these strip charts only as backup. In addition, the essential meteorological parameters wind speed, wind direction and a measure of atmospheric stability should be identified as safety-related and daily surveillance checks provided as required in Appendix A Technical Specifications.

The inspectors found that the meteorological data acquisition system provided for the key meteorological parameters and recommended that the licensee include a procedure for accessing this data for initial dose calculations and for providing remote interrogation of the meteorological parameters (See Appendix A, Item 84-10-04).

Based on the above findings, no violations were identified, however, this area will be further investigated.

g. Public Information Program (IE Procedure No. 82209)

The inspectors held discussions with licensee personnel and reviewed the licensee's basic emergency planning information (Nine Mile Point Emergency Planning and You), telephone book insert and the emergency planning zones and evacuation routes poster. Distribution of the brochure and posters is scheduled annually for residents within the emergency planning zone (EPZ). The Oswego County office of Emergency Preparedness disseminated the posters to Oswego business representatives and community officials. The licensee distributed the brochures during July, 1982 and September, 1983.

h. Licensee Audits (IE Procedure No. 82210)

The inspectors held discussions with licensee personnel and reviewed Audit Report No. H-16 (January 9, 1984) of the emergency preparedness program conducted by individuals independent of the emergency preparedness group. In addition, the inspectors reviewed the licensee's evaluation of procedure EAP-8 (Personnel Accountability) and EAP-3 (Fire). The inspectors noted that the licensee has a program for identifying deficiencies and weaknesses and for providing appropriate corrective action.

Based on the above review, no violations were identified.

i. Emergency Plan Review

The inspectors reviewed the licensee's Emergency Plan, held discussions with licensee personnel and requested that the following comments be reviewed and that appropriate changes be reflected in the next annual revision of the Plan (See Appendix A, Item 84-10-05).

- (C.1b, c)* Estimate time of arrival of federal assistance that may be provided by USNRC Region I, RAC by Brookhaven National Laboratories and U.S. Coast Guard.
- (2) (C.2b)* Revise cross reference of this standard from paragraph 5.5.1 to 5.3.11.
- (3) (D.1)* Review comments concerning the following initiating conditions presented to Messrs. Converse and Avrakotos on May 24, 1984 concerning:

Unusual Event, Initiating Conditions 2, 5, 8, 9, 14 and 16; Alert, Initiating Conditions 5, 11, 12, 13, 15 and 17;

Site Area, Initiating Conditions 4, 9, 11, 12, 14, 15, 16 and 18; General Emergency, Consider Guidance of NUREG-0818.

The following NUREG-0654 Initiating Conditions were not addressed within the Emergency Classification system:

Unusual Event 1, 4, 6, 7, 11, 14b. 14c, 14e and 15; Alert 6, 7, 8, 9, 10, 18a, 18b, 18c and 19; Site Area 2, 6, 7, 8 and 17.

Also, provide a cross reference to NUREG-0654 Appendix 1 examples of initiating conditions.

(4) (H.5.b)* Revise reference to paragraph 7.3.3.8.

- (5) (H.6)* Provide commitment that the environmental radiation monitors are installed in accordance with the NRC Radiological Assessment Branch Technical Position.
- (6) (H.12)* Provide central point for receipt and analyses of field monitoring data and coordination of sample media.
- (7) (1.5)* Identify refined dose assessment capability and provide remote interrogation of meteorological data by the NRC and State response agencies.
- (8) (J.6)* Cross reference appropriate implementing procedure.
- (9) (N.2c)* Specify that the exercise will include use of the post accident sampling system provided technical specifications are not violated.
- (10) (P.1)* Provide a description of training for the Emergency Planning Coordinator.
- * Refers to NUREG-0654 Planning Standards.

4. Exit Meeting

On May 25, 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.