

UNION ELECTRIC COMPANY

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VICE PRESIDENT

July 6, 1984

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Mr. C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Safety Branch
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

ULNRC- 867

Dear Mr. Paperiello:

INSPECTION REPORT NO. 50-483/84-10
CALLAWAY PLANT, UNIT 1
EMERGENCY PREPAREDNESS APPRAISAL

Reference: May 25, 1984 letter from
C. J. Paperiello to D. F. Schnell

The referenced letter transmitted suggested improvement items from exercise and drill inspections conducted between March 19 and 23, 1984, and between May 9 and 11, 1984. Attached are our responses to these NRC Improvement Items.

If there are any questions, please contact us.

Very truly yours,



Donald F. Schnell

DFS/lkr

Attachment

cc: W. L. Forney, NRC Region III
NRC Resident Inspectors, Callaway Plant (2)
Missouri Public Service Commission
D. M. Rohrer

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EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

ITEM 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.

RESPONSE: The role of the STA, as a County EOC Technical Representative is being evaluated. Additional personnel will be assigned to fill the position of Technical Representative.

ITEM 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.

RESPONSE: Emergency Preparedness is currently assessing the feasibility of utilizing automatic callout devices which may eliminate the callout folders.

ITEM 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.

RESPONSE: Semi-annual drills will be made to ensure shift augmentation can be made as specified in the RERP. The appropriate procedure will be modified to ensure the drill is held semi-annually.

ITEM A4. Control Room personnel should receive additional familiarization training on dedicated communications equipment in the Control Room.

RESPONSE: Remedial training will be given to Control Room personnel. The training program and future drills will stress familiarization of dedicated communications equipment in the Control Room.

ITEM A5. Shift Supervisors and Shift Technical Advisors should receive additional training on core damage assessment procedures.

RESPONSE: Additional training on core damage assessment procedures will be incorporated into the retraining program for Shift Supervisors and STA's.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

- ITEM A6. Signs or arrows should be posted in the plant to indicate how to leave the facility and proceed to the appropriate assembly area.
- RESPONSE: Indications on how to leave work areas and proceed to assembly areas or plant exits will be posted. The method is currently being studied.
- ITEM 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."
- RESPONSE: EIP-ZZ-00212, Protective Action Recommendations, Attachment 1 has been revised to define "substantial core damage" and "large fission product inventory".
- ITEM 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).
- RESPONSE: Attachment 1 to EIP-ZZ-00212 has been revised to indicate the EAL's should be reviewed if substantial core damage is in progress or projected. The appropriate EAL's will be revised to indicate a General Emergency can be declared based upon projected conditions.
- ITEM 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.
- RESPONSE: Remedial training will be given to personnel responsible for handling injured, contaminated personnel. The training program to instruct appropriate personnel on search and rescue teams will include avoiding leaving casualties unattended and the need to expedite transport.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

ITEM B2. Control Room personnel should be retrained on the procedure for requesting offsite medical assistance.

RESPONSE: The retraining program for Control Room personnel will be modified to ensure they are familiar with the procedure for contacting and requesting off-site medical assistance.

ITEM B3. The Health Physics Coordinator's emergency packet should include telephone numbers of local medical facilities to which injured, contaminated personnel may be transported.

RESPONSE: The Health Physics Coordinator's packet contains the telephone numbers of medical facilities. The telephone numbers are in EIP-ZZ-00224, Transport of Contaminated Injured/Ill Personnel, and in the Emergency Telephone Directory. This will be drawn to Health Physics Coordinators' attention in retraining and drills.

ITEM 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.

RESPONSE: The role of the STA has been re-evaluated and incorporated into Administrative Procedure APA-ZZ-00010, Conduct of Operations - Operations.

ITEM 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.

RESPONSE: The RERP will be revised to allow a senior plant manager (at his option) to relieve the Shift Supervisor of Emergency Coordinator responsibilities while in the Control Room.

ITEM B6. The applicant should develop and implement improved provisions for estimating the extent of core damage.

RESPONSE: Procedure EDP-ZZ-00005, "Assessing Core Damage" has been revised (Rev. 1 5/18/84) and issued.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

ITEM 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.

RESPONSE: Seating arrangements in the TSC are being modified to facilitate the interface between the subject coordinators.

ITEM 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.

RESPONSE: A note will be added to EIP-ZZ-00212 "Protective Action Recommendations", to indicate that protective measures beyond the exclusion area boundary should warrant declaration of a General Emergency. The training program will be appropriately modified.

ITEM B9. Technical Support Center (TSC) status boards should contain information on both protective measures recommended and those implemented.

RESPONSE: Status boards in the TSC and EOF have been modified to indicate Protective Action Recommendations given by UE and those implemented.

ITEM 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.

RESPONSE: Internal messages of significance will be routed to TSC Coordinators. The means to implement the distribution is being looked into. A status board/log keeper is assigned to compile a chronology of events.

ITEM 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.

RESPONSE: The Dose Assessment procedure and computer software will be reviewed and modified appropriately to ensure consistency of units.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

ITEM 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.

RESPONSE: Setup of the OSC will be revised to ensure a monitoring station is at the entrance and not across the room.

ITEM 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.

RESPONSE: Per existing procedures, teams shall have periodic communications with the OSC which include updates and briefings. This will be stressed in training sessions and drills.

ITEM 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.

RESPONSE: Per procedure, the Radiological Assessment and Technical Support Coordinators should advise the Recovery Manager on Protective Action Recommendations. This will be stressed in training sessions and drills.

ITEM 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.

RESPONSE: The Osage County area within the EPZ is sparsely populated. The one population center, Chamois with a population of approximately 546, is located on Highway 89. It would not seem feasible to permanently subdivide Chamois into two subareas for implementation of protective actions. However, county officials can divide the subarea, as demonstrated during the Field Exercise, to limit the affected population in any manner deemed appropriate.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

- ITEM B16. Previously forecast meteorological conditions should be doublechecked for continued accuracy when formulating revised protective action recommendations.
- RESPONSE: Procedure EIP-ZZ-00212, Protective Action Recommendations, will be revised to ensure the forecast is periodically updated.
- ITEM 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.
- RESPONSE: Status boards in the TSC and EOF have been revised to include Protective Action Recommendations recommended by UE and those implemented by the counties. The status boards in the EOF will indicate both subareas and sectors.
- ITEM B18. The NRC workspace in the Recovery Center room should be provided with telephones for making onsite and offsite calls.
- RESPONSE: Additional telephones have been requested and will be installed in the NRC workspace in the Recovery Center.
- ITEM B19. The Emergency Control Center room and State representative's room should be provided with clocks.
- RESPONSE: Clocks will be added in the Emergency Control Center and the State and local office.
- ITEM 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.
- RESPONSE: Field Team Communicators will be instructed to periodically update Field Monitoring Teams on plant status and protective actions. This will be stressed in training sessions and drills.
- ITEM B21. Reports of offsite survey results should include the appropriate units of measure.

EMERGENCY PREPAREDNESS IMPROVEMENT ITEMS

RESPONSE: Field Monitoring Teams will be instructed to report units of measurements. Procedures will be appropriately modified. This will also be stressed in training sessions and drills.

ITEM B22. Gloves should be used when replacing air sampler filter cartridges to reduce the risk of spreading contamination.

RESPONSE: Gloves are available in Field Monitoring Emergency Kits. Gloves will be used in accordance with health physics practices to prevent contamination. This will be stressed in training sessions and drills.

ITEM B23. The initial press briefing on on-site activities should be conducted in a more timely manner.

RESPONSE: Efforts will be made to expedite the initial press briefings on onsite activities at the JPIC.

ITEM 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.

RESPONSE: In future drills the need for the spokesperson to minimize the use of acronyms and to provide additional information will be stressed.

ITEM 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.

RESPONSE: In the event of a prolonged emergency or recovery activities, personnel other than the Recovery Managers may be assigned to the JPIC as Company Spokesperson. Personnel other than Recovery Managers are also identified to fill this position.