



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION II
 101 MARIETTA STREET, N.W.
 ATLANTA, GEORGIA 30323

MAY 21 1992

Report No.: 50-302/92-09

Licensee: Florida Power Corporation
 3201 -34th Street, South
 St. Petersburg, FL 33733

Docket No.: 50-302

License No.: DPR-72

Facility Name: Crystal River 3

Inspection Conducted: April 6-10, 1992

Inspectors: W. M. Sartor, Jr. 5/19/92
 W. M. Sartor, Jr. Date Signed

A. Gooden 5/19/92
 A. Gooden Date Signed

Approved by: W. H. Rankin 5/20/92
 W. H. Rankin, Chief Date Signed

Emergency Preparedness Section
 Emergency Preparedness and Radiological
 Protection Branch
 Division of Radiation Safety and Safeguards

SUMMARY

Scope:

This routine, unannounced inspection was conducted to assess the operational readiness of the site emergency preparedness program, and included selective review of the following programmatic areas: (1) Emergency Plan and associated implementing procedures; (2) facilities, equipment, instrumentation, and supplies; (3) organization and management control; (4) training; (5) independent and internal reviews and audits; (6) emergency detection and classification; (7) protective action decision-making; (8) notifications and communications; and (9) public information program.

Results:

One non-cited violation was identified for failure to maintain the technical specifications up to date (Paragraph 3). From an overall perspective, the emergency preparedness program was found to be generally maintained in an adequate state of operational readiness.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *J. Alberdi, Manager, Nuclear Plant Operations
- J. Anna, Supervisor, Nuclear Document Control
- *A. Auner, Manager, Nuclear Technical Training
- *J. Buckner, Nuclear Regulatory Specialist
- *S. Chapin, Radiological Emergency Planning Specialist
- R. Croft, Document Control Clerk
- R. Davis, Nuclear Shift Supervisor
- L. Floyd, Supervisor, Nuclear Document Control
- *E. Froats, Manager, Nuclear Compliance
- *R. Fuller, Senior Nuclear Licensing Engineer
- *I. Gerardin, Senior Quality Auditor
- *S. Johnson, Manager, Nuclear Quality Assessments
- D. Jones, Nuclear Shift Supervisor
- *L. Kelly, Director, Nuclear Operations Training
- M. Laycock, Radiological Emergency Planning Specialist
- *G. Longhouser, Superintendent, Nuclear Operations
- *D. Porter, Superintendent, Nuclear Operations
- *V. Roppel, Manager, Nuclear Plant Maintenance
- *W. Rossfeld, Manager, Site Nuclear Services
- L. Snow, Training Clerk
- *J. Stephenson, Manager, Radiological Emergency Planning
- *R. Widell, Director, Nuclear Operations Site Support
- *K. Wilson, Manager, Nuclear Licensing
- *R. Yost, Supervisor, Quality Audits

Other Organizations

- N. Hedin, Administrative Assistant, Citrus County Emergency Planning
- W. Hunt, Radiological Emergency Planning Coordinator, Citrus County
- J. Soukup, Emergency Operations Director, Citrus County

NRC Resident Inspectors

- *G. Freudenberger, Resident Inspector
- P. Holmes-Ray, Senior Resident Inspector

*Attended exit interview

2. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and Appendix E to 10 CFR Part 50, this area was inspected to determine whether significant changes were made in the licensee emergency preparedness program since the last inspection in this area. The inspector reviewed the

revision dated 07/12/91 to the Emergency Plan. It had been submitted to the NRC by letter dated 07/23/91.

No violations or deviations were identified.

3. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(g), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's emergency response facilities and associated equipment, instrumentation, and supplies were maintained in a state of operational readiness, and to assess the impact of any changes in this area upon the emergency preparedness program.

The inspector toured the licensee's Technical Support Center (TSC) and Emergency Operations Facility (EOF). Selective examination of emergency response equipment, instrumentation, and supplies indicated that an adequate state of readiness was being maintained, with one significant exception. The exception was the CR-3 Technical Specifications maintained in the EOF as directed by paragraph 5.2.4 of the Radiological Emergency Plan. Copy 95 of the CR-3 Technical Specifications in the EOF cabinet was found to have pages missing and numerous outdated pages. The licensee took immediate corrective action and updated the document. The inspector identified the failure to maintain the technical specifications in accordance with the Radiological Emergency Plan as a non-cited violation (NCV) because of the Severity Level V of the violation along with the licensee's prompt corrective action. This NRC identified violation is not being cited because the criteria specified in Section VII.B of the NRC Enforcement Policy were satisfied.

50-302/92-09-01 NCV - Failure to maintain the EOF technical specifications current.

4. Organization and Management Control (82701)

Pursuant to 10 CFR 50.47(b)(1) and (16) and Section IV.A of Appendix E to 10 CFR Part 50, this area was inspected to determine the effects of any changes to the licensee's emergency organization and/or management control systems on the emergency preparedness program and to verify that any such changes were properly factored into the Emergency Plan and Emergency Plan Implementing Procedures (EPIPs). The organization and management of the emergency preparedness program were reviewed and discussed with licensee representatives. A significant enhancement to the

emergency preparedness program had occurred with the Radiological Emergency Planning position being upgraded to a manager level from a supervisor level. As a result, the Radiological Emergency Planning Manager now reports to the Director, Nuclear Operations Site Support in lieu of the Manager, Site Nuclear Services. Additionally, another Planning Specialist was added to the emergency planning staff.

No violations or deviations were identified.

5. Training (82701)

Pursuant to 10 CFR 50.47(b) (2) and (15) and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector randomly selected the EOF dose assessment members and EOF director positions for review of training qualifications. The training records of all personnel presently listed as qualified for those positions were reviewed by the inspector and no discrepancies were noted.

No violations or deviations were identified.

6. Independent and Internal Reviews/Audits (82701)

Pursuant to 10 CFR 50.54(t) and Sections 8.2.1 and 8.9 of the Emergency Plan, this area was inspected to determine whether the licensee had performed an independent audit of the emergency preparedness program, and whether the emergency planning staff had conducted a review of the Plan and the EIPs.

The inspector reviewed the 91-03-SSUP and draft portions of the 92-03-SSUP audits. The audits appeared to meet regulatory requirements.

No violations or deviations were identified.

7. Emergency Detection and Classification (82201)

Pursuant to 10 CFR 50.47(b) (4); 10 CFR Part 50, Appendix E, Sections IV.B and IV.C; Section 8.0 of the licensee's Emergency Plan; and guidance in Appendix 1 of NUREG-0654, this program area was inspected to determine if the licensee used and understood a standard emergency action level (EAL) and classification scheme.

The inspector verified that the licensee's procedures included criteria for initiation of offsite notifications and for development of protective action recommendations (PARs). The procedures required that offsite notifications be made within 15 minutes of the declaration of an emergency.

The inspector discussed with a member of the licensee's staff the coordination of EALs with State and local officials. According to the documentation, the calendar year 1991 EAL review with State and local officials was conducted on February 14, 1991. No disagreements were noted; State/local officials were in agreement with the EALs.

The inspector reviewed the Crystal River event classifications in Procedure EM-202 "Duties of the Emergency Coordinator" for consistency with event classifications in Section 8.0 of the Plan. No problems were noted. The selected EALs did not appear to contain impediments or errors that would result in an incorrect, or untimely classification.

The responsibility and authority for the classification of emergency events and initiation of emergency actions were described in Procedure EM-202 "Duties of the Emergency Coordinator." Interviews with two Shift Supervisors regarding their role as the Interim Emergency Coordinator (IEC) disclosed that the interviewees understood their role, responsibilities, and authorities in event classification, notification, and PARs. Walk-through evaluations involving event classification, dose projection and PARs were conducted with the aforementioned individuals. Interviewees demonstrated the ability to identify and classify postulated accident conditions in the appropriate emergency class, and make timely PARs based on plant conditions and/or dose projections. Interviewees were both timely and correct in the initial dose assessment calculations utilizing the manual methodology.

During the walk-throughs, the inspector noted that the monitoring instrumentation (e.g., main stack monitor, reactor building vent monitor, meteorological parameter, etc.) for post accident assessment and dose projection was operational. The inspector verified during the equipment operability check that the EALs were consistent in range and units with the Control Room instrumentation. No problems were noted. The inspector reviewed the licensee's procedures implemented during abnormal plant conditions. These procedures (known as Abnormal, Emergency, or Verification) provide guidance for mitigating abnormal plant conditions which may result in true emergencies, or

returning the plant to a normal state of operation. Neither of the referenced procedures directed the user to classify an emergency. However, the Verification Procedure (VP-580) refers the user to EM-202 "Duties of the Emergency Coordinator." Consequently, the procedures did not cross-reference the EALs and/or direct the user to classify emergencies. Event classifications were reliant on implementation of EM-202.

No violations or deviations were identified.

8. Protective Action Decision-making (82202)

Pursuant to 10 CFR 50.47(b)(9) and (10); 10 CFR Part 50, Appendix E, Section IV.D.3; and Section 14.0 of the licensee's Emergency Plan, this area was inspected to determine whether the licensee had 24-hour-per-day capability to assess and analyze emergency conditions and make recommendations to protect the public and onsite workers, and whether offsite officials had the authority and capability to initiate prompt protective action for the public.

The inspector reviewed pertinent portions of the licensee's Emergency Plan and procedures for responsibility and authority for protective action decision-making. These documents clearly assigned responsibility and authority for accident assessment and protective action decision-making. Interviews with members of the licensee's emergency organization showed that these personnel understood their authorities and responsibilities with respect to accident assessment and protective action decision making. Walk-through evaluations involving protective action decision-making were conducted with two key members of the licensee's staff. Each interviewee appeared to be cognizant of appropriate onsite protective measures and aware of the range of PARs appropriate for offsite protection. Interviewees demonstrated that PARs may be made based on plant status (core condition and containment) and dose projections even if no release is in progress.

Licensee procedures made provisions for contacting responsible offsite authorities on a 24-hour basis. Backup communications links with offsite authorities were available. The inspector independently confirmed that offsite decision-makers with authority for emergency response activities could be contacted by observing a communications check of the State Hot Ring Down System (SHRD) to offsite authorities from the TSC.

No violations or deviations were identified.

9. Notifications and Communications (82203)

Pursuant to 10 CFR 50.47(b)(5) and (6); 10 CFR Part 50, Appendix E, Section IV.D; and Sections 9.0 and 10.0 of the licensee's Emergency Plan, this area was inspected to determine whether the licensee was maintaining a capability for notifying and communicating with plant personnel, offsite supporting agencies and authorities, and the population within the 10-mile emergency planning zone (EPZ).

The inspector reviewed the licensee's notification procedures (EM-202 and EM-206). EM-202 entitled "Duties of the Emergency Coordinator" specified when to notify and activate the onsite emergency organization, corporate support organization, and offsite agencies. The procedures were consistent with the emergency classification and EAL scheme used by the licensee. The notification message form in EM-202 was consistent with the guidance in NUREG-0654, Sections II.E.3 and II.E.4. EM-206 provided a listing of names and telephone numbers of personnel and organizations who may need to be notified in the event of an emergency condition. Included as an enclosure to EM-206 was an emergency roster call-list. Documentation was provided to show that the licensee on a quarterly basis was updating the plant notification roster. The inspector verified that randomly selected phone numbers (normal and off-hours) for offsite authorities were current and up-to-date by making calls to select locations. The inspector observed an operability test of the following communications equipment located in the TSC: Emergency Notification System (ENS), SHRD, and Citrus County Radio Check. No problems were noted.

The management control program for the Early Warning Notification System (EWNS) was reviewed. According to documentation and discussions with Citrus County and licensee representatives, the system consisted of 40 sirens within the 10 mile EPZ, and tone-alert radios were distributed in institutional facilities within the 10 mile EPZ (schools, nursing homes, etc.).

Documentation which summarized the calendar year 1991 EWNS testing disclosed that the EWNS average operability for calendar year 1991 was above 94%. The inspector reviewed siren test records for the period January 4, 1991 to March 27, 1992. The records showed that tests were performed in accordance with procedural requirements and exceeded the guidance in NUREG-0654 in that full cycle tests were performed more frequently (weekly) than specified in NUREG-0654 (annually). The Citrus County Department of Emergency Management provided periodic testing and maintenance for the EWNS. During the review of test

documentation, the inspector noted that two sirens were out of service for extended periods. The delay was more than four months for siren #123 and more than five months for siren #201. The delays were discussed with the licensee and county authorities. The inspector was informed that the delays were attributed to the lack of spare parts; however, subsequent to the delays actions were taken to secure spare parts to prevent recurrence.

Communications equipment in the Control Room and TSC were inspected. Provisions existed for prompt communications among emergency response organizations, to emergency response personnel, and to the public. The installed communications systems at the emergency response facilities were consistent with system descriptions in the Emergency Plan and EPIPs. The inspector observed operability checks on selected communications equipment in the TSC. No problems were observed. The inspector reviewed licensee records for the period January 25, 1991 to March 27, 1992 and noted that communications tests were conducted at the frequencies specified in NUREG-0654, Section II.N.2.a. Licensee records also revealed that corrective action was taken on problems identified during communication tests. Phone numbers for randomly selected personnel assigned to the on-call schedule were compared with phone numbers in the local telephone directory and no problems were noted.

As part of the emergency communication equipment, the inspector reviewed the maintenance and periodic testing of the plant emergency warning system for high noise areas. The referenced system consists of flashing strobe lights and an evacuation alarm sounded over the plant public address system. Test documentation disclosed that operability tests were performed quarterly of the visual signal and weekly of the audible signal.

The inspector discussed with a member of the licensee's staff the status of NRC emergency telecommunications system upgrade as discussed in Generic Letter 91-14 dated September 23, 1991. The inspector was informed that the FTS 2000 lines are completely installed; however, no hardware had been delivered.

No violations or deviations were identified.

10. Public Information Program (82209)

Pursuant to 10 CFR 50.47(b)(7) and 10 CFR Part 50, Appendix E, Section IV.D.2, this area was inspected to determine whether basic emergency planning information was disseminated to the public in the 10-mile EPZ on an annual basis.

The licensee had developed an emergency response information brochure for use by the public residing in the 10-mile EPZ. The brochure took the form of a calendar. As a calendar, the brochure was updated and distributed annually. The inspector reviewed documentation to show that the calendar years 1991 and 1992 brochures were coordinated with the appropriate offsite authorities. The inspector reviewed the current calendar (1992) and verified that it included the information specified by NUREG-0654, Section II.G. Prior to calendar year 1991-1992, the licensee's public information literature included an emergency planning brochure and EPZ map. In addition to the calendars, emergency information was contained inside local phone directories. When questioned regarding calendar distributions, Citrus County representatives indicated that the calendars were distributed based on property appraisal reports (property tax printout).

According to Citrus County representatives and a member of the licensee's staff, the means used by the licensee to inform the transient population of appropriate emergency response measures and action consisted of printed materials for hotels and motels, and posted notices at various locations (recreational areas, boat launching pads, camping facilities) within the 10-mile EPZ. Randomly selected locations were checked for verification as displaying the appropriate information. Three exceptions were noted: (1) only one of the three selected hotels had literature to provide new or transient individuals; (2) no warning information or notice was located at the Fort Island boat launching pad or beach area; and (3) one business location within the 10 mile EPZ was unaware of literature being supplied or available to the transient population. Irrespective of the availability of material at the aforementioned locations, the interviewees at the three hotels and one business establishment all demonstrated limited knowledge regarding actions to take in the event of an accident at Crystal River. In response to this item, the licensee expressed plans to take actions in coordination with Citrus County in the area of public information and notification for transient population. The licensee was informed that this matter would be tracked as an Inspector Followup Item (IFI). IFI 50-302/92-09-02: Coordinate actions with offsite interface in the area of public information and notification for transient population.

In addition to the emergency planning calendar, the public information program included an annual program for informing news media personnel, and a visitors center located within the owner controlled area known as the "Florida Power Energy Information Center." The annual news media briefing was

held on May 28, 1991 and included presentations by licensee, State, and local personnel.

No violations or deviations were identified.

11. Exit Interview

The inspection scope and results were summarized on April 10, 1992 with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results. Dissenting comments were not received from the licensee. The licensee did not identify as proprietary any of the information received by the inspector.

<u>Item Number</u>	<u>Description/Reference</u>
50-302/92-09-01	NCV - Failure to maintain the EOF technical specifications current (Paragraph 3).
50-302/92-09-02	IFI - Coordinate with offsite interface on public information for transient population (Paragraph 10).