

AUG 14 1984

Docket No. 50-352

Philadelphia Electric Company
ATTN: Mr. John S. Kemper
Vice President
Engineering and Research
2301 Market Street
Philadelphia, Pennsylvania 19101

Gentlemen:

Subject: EMERGENCY PREPAREDNESS APPRAISAL (50-352/84-18)

During the period of June 11-22, 1984, the NRC conducted an appraisal of the emergency preparedness program at the Limerick Generating Station. The objective of the appraisal was to evaluate the overall adequacy and effectiveness of licensee onsite emergency preparedness and to identify areas of weakness that need to be strengthened. Areas examined during this appraisal are described in the enclosed report (50-352/84-18). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed activities and interviewed personnel.

The findings of this emergency preparedness appraisal indicate that certain corrective actions are required in your emergency preparedness program. These are discussed in Appendix A, "Significant Emergency Preparedness Findings". Other areas needing improvement are discussed in Appendix B, "Emergency Preparedness Improvement Items".

Appendix A and B of this letter contain an inclusive listing of all outstanding onsite emergency preparedness items at your facility at this time.

We recognize that an explicit regulatory requirement pertaining to each item identified in Appendices A and B may not currently exist. Notwithstanding this, you are requested to submit a written statement within thirty (30) working days of the date of this letter, describing your planned actions for improving each of the items identified in Appendix A and the results of your consideration of each of the items in Appendix B. This description is to include, (1) actions which have been taken, (2) actions which will be taken, and (3) a schedule for completion of actions for each item.

In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosure will be placed in the NRC Public Document Room unless you notify this office, by telephone, within ten days of the date of this letter and submit written application to withhold information contained therein within thirty days of the date of this letter. Such application must be consistent with the requirements of 2.790(b)(1). The telephone notification of your intent to request withholding, or any request for an extension of the 10 day period which you believe necessary, should be made to the Supervisor, Files, Mail and Records, USNRC Region I, at (215)337-5223.

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The reporting requirements contained in this letter affect fewer than ten (10) persons and therefore are not subject to Office of Management and Budget Clearance as required by PL 96-511.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,

Original Signed By:

Thomas T. Martin, Director
Division of Engineering and Technical Programs

Enclosures:

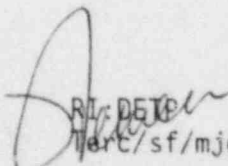
1. Appendix A, Notice of Violation
2. NRC Region I Inspection Report Number 50-352/84-18


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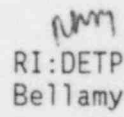
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 Troy B. Conner, Jr., Esquire
 Eugene J. Bradley, Esquire, Assistant General Counsel
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APPENDIX A

SIGNIFICANT EMERGENCY PREPAREDNESS FINDINGS

Based on the results of the NRC's appraisal of the Limerick Generating Station Emergency Preparedness Program conducted June 11-22, 1984, the following improvements are required: (References are to sections in NRC Region I Inspection Report No. 50-352/84-18)

1. Formally assign an onsite Emergency Preparedness Coordinator (EPC) using selection criteria equivalent to those for Supervisors in ANSI N.3.1. This individual should report to the station superintendent and be given direct working level responsibility and authority over all aspects of the development and maintenance of the LGS Emergency Preparedness Program (EPP). Revise normal organizational charts, position analysis descriptions, and other related documents to reflect the EPC assignment in addition to describing the scope of duties, authority, and reporting chain. (See Section 1)
2. Develop and identify tasks, strategies, and landmarks to implement and efficiently coordinate the onsite EPP to include as a minimum: indication of the responsibilities and authorities of the individuals involved; the extent of participation of onsite technical groups in the development and implementation of training; implementation of procedures, and the selection of equipment and supplies. (See Section 1)
3. Review the description of your emergency organization and revise it as necessary to provide for a clear depiction of all emergency functions required during initial, intermediate, and final phases of augmentation and recovery; update the site and corporate Emergency Plans to describe the revised organization; revise and issue implementing procedures which have been human engineered so that all emergency response tasks can be carried out using the command and information pathways of the organizations. The updated description of your emergency organization should include a sufficient level of detail, unambiguously delineate the command hierarchy, clearly specify its structure, reporting chains and interrelationships at any phase of augmentation, and include supervisory as well as non-supervisory elements. (See Section 2)
4. Provide greater depth in the line of successions for the various supervisory elements of the emergency organization. (See Section 2)
5. Establish qualification criteria for instructors. (See Section 3.1)
6. Establish a single point of responsibility for across-the-board Emergency Plan Training. (See Section 3.1)
7. Establish qualification criteria for each emergency response function in such a manner that a clear line of progression, from untrained to qualified, including hands-on demonstrations, can be achieved. (See Section 3.1)

8. Organize and consolidate training records so that it is possible to track the progress of qualification for each individual assigned to specific emergency response duties. (See Section 3.1)
9. Develop a means to evaluate and record individual proficiency for out of classroom training activities, walkthroughs, mini-drills, and other. (See Section 3.1)
10. Specify General Employee Training (GET) and retraining requirements in the Emergency Plan (EP). (See Section 3.1)
11. Complete training and qualify all emergency organizational elements, so that instructors can verify with a reasonable degree of assurance that they will effectively perform their emergency duties during actual emergencies. (See Section 3.2)
12. Implement a centralized Emergency Plan training records system consistent with the findings of Section 3.1 (50-352/84-18-08), and the revised emergency organization which will allow determination of the progress of emergency response personnel toward full qualification. (See Section 3.2)
13. Complete control room Unit 1 and common area installations and ensure that all emergency equipment, supplies, and supporting documentation are in place. (See Section 4.1.1.1)
14. Complete installation, testing, and turnover of the Technical Support Center (TSC) communications, ventilation, radiation monitoring, Emergency Response Facility Data System (ERFDS), personal dosimetry, and thyroid blocking systems and equipment. (See Section 4.1.1.2)
15. Ensure that TSC direct radiation protection factors comply with habitability guidance of paragraph 2.6 of NUREG-0696. (See Section 4.1.1.2)
16. Remove the wooden bridge which is installed to couple the Unit 1 protected area with the TSC since it violates the integrity of the protected area isolation zone. (See Section 4.1.1.2)
17. Establish an equipment and supply inventory for the Operating Support Center (OSC). Outfit the space, stow emergency materials and install locks or seals as appropriate. (See Section 4.1.1.3)
18. Review the concept of operations of the OSC with respect to the number of personnel assigned under all conditions. (See Section 4.1.1.3)
19. Designate a specific location for an alternate OSC; define the staffing therein; revise supporting documentation as required to ensure continuity of operations in the alternate OSC. (See Section 4.1.1.3)

20. Complete the acceptance testing, verify the operability of the PASS station, and ensure that the facility meets the criteria of NUREG-0737 to allow post accident primary coolant sampling and analysis. (See Section 4.1.1.5)
21. Complete the acceptance testing, verify the operability of the PASS station, and ensure that it meets the criteria of NUREG-0737 to allow post accident containment air sampling and analysis. (See Section 4.1.1.6)
22. Demonstrate that a gas and particulate sample can be obtained from the Wide-Range Gas Monitor (WRGM) under severe accident conditions, (i.e., in full respiratory protection gear and carrying the transport cask) utilizing the access routes given in EP-231. (See Section 4.1.1.7)
23. Develop plans/schemes and procedures for handling, storing, transferring, and discharging post-accident liquid wastes. (See Section 4.1.1.8)
24. Identify permanent back-up capability for performing chemical and radiochemical analysis during emergencies, so that the time for sample measurement and analysis will not exceed the limits of NUREG-0737. (See Section 4.1.1.9)
25. Specify alternate assembly areas in the event that primary areas should become uninhabitable; mark primary and alternate assembly areas; revise the Emergency Plan and EPIP-110 to identify all assembly and re-assembly areas; identify monitoring and decontamination capability for each and where no capability exists at the assembly area, identify the sources from which support equipment and supplies would be obtained. (See Section 4.1.2.1)
26. Establish an onsite medical facility as required by 10 CFR 50, Appendix E and NUREG-0654, which is capable of supporting the various scenarios that may occur during accidents including the simultaneous or sequential handling of several injured and contaminated persons. (See Section 4.1.2.2)
27. Provide equipment, supplies and procedures for the decontamination facility and modify the internal structure of this facility to ensure adequate contamination control. (See Section 4.1.2.3)
28. Ensure that the contents of all emergency kits are as described in the Emergency Plan and Implementing Procedures, that inventories are consistent with the description of contents in ST-O-EPP-351-0, Rev. 2, and verify that portable radiological survey instrumentation in emergency kits are calibrated. (See Section 4.2.1.1)
29. Verify the operability and adequacy of all Process Radiation Monitors; establish procedures for calibration and calibrate all ARMs and PRMs. (See Section 4.2.1.2)
30. Complete the installation, and verify the operability of Reg. Guide 1.97 type A-D non-radiation process monitors. (See Section 4.2.1.3)

31. Provide a communications link and procedures with the National Weather Service from which meteorological conditions representative of the region surrounding the site can be obtained. (See Section 4.2.1.4)
32. Provide equipment and/or procedures for the National Weather Service to notify the Control Room shift personnel of severe weather conditions affecting or likely to affect the site. (See Section 4.2.1.4)
33. Improve the exposure of sensors on the primary tower. (See Section 4.2.1.4)
34. Establish by means of sufficient data that the current meteorological measurements system provides reliable indication of meteorological variables. (See Section 4.2.1.4)
35. Provide updated radiological assessment/projection procedures which are consistent with acceptable atmospheric stability estimators. (See Section 4.2.1.4)
36. Implement a program to certify that personnel are respirator qualified to support emergency activities. (See Section 4.2.2.1)
37. Provide protective clothing supplies for all locations for emergency response functions consistent with the types and levels of radioactive contamination expected during emergencies. (See Section 4.2.2.2)
38. Incorporate into the EP and EIPs details of the communication links between each organizational element and identify associated equipment used for emergency communications. (See Section 4.2.3)
39. Complete installation, and testing, and ensure operation of the prompt alert and notification (siren) system in the plume exposure EPZ. (See Section 4.2.3)
40. Provide a means to ensure reliability and operation of the siren warning system. (See Section 4.2.3)
41. Determine the needs for prepositioned inplant damage control kits, outfit and position kits in marked storage lockers, and revise EPP's accordingly. (See Section 4.2.4)
42. Identify in EIP's transportation arrangements to be provided for site personnel in the event of a site evacuation. (See Section 4.2.6)
43. Review Emergency Plan Implementing Procedures and make revisions to:
(See Section 5.1)
 - Specify duties and responsibilities of emergency personnel performing emergency response tasks;

- Correct ambiguities, inconsistencies, omissions, errors, wordy discussions, unnecessary references, lists of contents, and other extraneous materials in order to help users perform their duties during emergencies more efficiently;
- Provide specific cross-references to other procedures in the action steps when needed to further detail and clarify actions;
- Identify lines of command, communications, and information flow necessary to perform emergency tasks and response actions; and
- Ensure that emergency response tasks are coordinated between the appropriate elements of the emergency organization and are consistent with the organizational structures.
- Provide adequate procedures to implement the Emergency Plan in these areas:
 - On-site (out-of-plant) radiological surveys during emergencies.
 - Sampling and analysis of high radioactive liquid waste.
 - Personnel accountability.
 - Security during emergencies.
 - Operation of radio chemistry analysis equipment.

APPENDIX B

Emergency Preparedness Improvement Items

Based on results of the NRC's appraisal of the Limerick Generating Station Emergency Preparedness Program conducted June 11-22, 1984, the following items should be considered for improvement: (References are to sections in NRC Region I Inspection Report No. 50-352/84-18.

1. Establish means for access control for the EOF. (See Section 4.1.1.4)
2. Include checklists used in the EOF in EP-203 "EOF Activation". (See Section 4.1.1.4)
3. Develop means for the disposal of radioactive wastes at assembly areas. (See Section 4.1.2.3)
4. Designate fixed facilities with existing communications capability, (e.g., personnel processing center and training center) for administrative and logistical support in the event of a prolonged emergency response and modify the EP as necessary to reflect these changes. (See Section 4.1.3)
5. Upgrade the Emergency Plan to include provisions for the Emergency Director to have the option to activate the Emergency News Center prior to a site area or general emergency. (See Section 4.1.4)
6. Implement procedures for inspecting the instrumentation at the meteorological towers and establish means to document results. (See Section 4.2.1.4)

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