

August 27, 1984

Docket No. 50-346

Toledo Edison Company
ATTN: Mr. Richard P. Crouse
Vice President
Nuclear
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Gentlemen:

This refers to the routine announced inspection conducted by Messrs. J. Patterson and M. Phillips and Ms. M. Smith of this office on July 30 through August 1, 1984, of activities at Davis-Besse Nuclear Power Station authorized by NRC Operating License No. NPF-3 and to the discussion of our findings with you and others of your staff at the conclusion of the inspection.

The enclosed copy of our inspection report identifies areas examined during the inspection. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain weaknesses were identified as part of the emergency preparedness exercise which will require corrective actions. These weaknesses are identified in the appendix to this letter. As required by 10 CFR Part 50, Appendix E (IV.F), any weaknesses that are identified must be corrected. Accordingly, you are requested to submit a written statement within 30 days of the date of this letter describing your planned actions for correcting the weaknesses identified in the appendix.

In addition, we wish to express our disappointment in Davis-Besse's poor performance in this emergency preparedness exercise. Several years ago, Toledo Edison had one of the strongest emergency preparedness programs in Region III. For the past two years, the program has been faltering. This was brought to your attention in the last SALP report and more recently in our letter of March 23, 1984. At that time we asked you to include emergency preparedness in your Performance Enhancement Program. In your April 18, 1984, response to us, you stated that to establish an Action Planning Team in this area would delay overall program completion. You stated however other Action Planning Teams would address our concerns. Since we have not seen an improvement in this program, we intend to increase our inspection efforts the next year in order to determine the reasons for the decline in the Davis-Besse's emergency preparedness performance.

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In accordance with 10 CFR 2.790(a), a copy of this letter and the enclosures 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). If we do not hear from you in this regard within the specified periods noted above, a copy of this letter, the enclosures, and your response to this letter will be placed in the Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

J. A. Hind
J. A. Hind, Director
Division of Radiation Safety
and Safeguards

Enclosures:

- 1. Appendix, Exercise Weaknesses
- 2. Inspection Report
No. 50-346/84-14(DRSS)

cc w/encl:

- T. D. Murray, Station
Superintendent
- DMB/Document Control Desk (RIDS)
- Resident Inspector, RIII
- Harold W. Kohn, Ohio EPA
- James W. Harris, State of Ohio
- Robert H. Quillin, Ohio
Department of Health
- W. Weaver, FEMA, Region V
- D. Matthews, EPB, OIE

RIII *gop*
Patterson/sf
08/24/84

RIII *Smith*
8/27/84

RIII *Phillips*
8/24/84

RIII *Jack*

RIII *Paperiello*
8/24/84

RIII *Hend*
8/27/84

Appendix

EXERCISE WEAKNESSES

1. The exercise scenario submitted to the NRC was incomplete, and the scenario used for the exercise contained several technical errors in data. (346/84-14-01) (Section 5.a)
2. Activation of the Technical Support Center, Radiation Testing Laboratory, Emergency Control Center, and Radiation Monitoring teams was disorganized to the point where some individuals were attempting to implement conflicting assignments made to them by more than one emergency response manager. Even after the facilities were officially activated personnel were not functioning in their assigned positions. (346/84-14-02) (Section 5.c, 5.e, and 5.h)
3. Technical Support Center communications with the Control Room were not sufficiently coordinated to ensure that each group was fully aware of plant status until the differences in data became so disparate that the TSC was told to stop participating. (346/84-14-03) (Section 5.c)
4. Neither the Technical Support Center nor the Emergency Control Center trended critical plant data which would impact on offsite releases such as the primary to secondary leak rate and radionuclide composition of the release. Neither facility maintained a record involving the total material released. (346/84-14-04) (Sections 5.c and 5.e)
5. No inplant radiation monitoring data was supplied to the Operational Support Center, while some teams left the OSC without an accompanying Chemistry and Radiation Tester to monitor doses, without a prescribed dose allowable to complete the assignment, and without a briefing of routes to follow and other actions to minimize team dose. (346/84-14-05) (Section 5.d)
6. The Emergency Duty Officer at the ECC failed to determine if any nonessential personnel were at the plant; and, therefore, a decision to evacuate them was never considered. (346/84-14-06) (Section 5.e)