U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-266/84-13(DRSS); 50-301/84-11(DRSS)

Docket No. 50-266; 50-301 License No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company
231 West Michigan
Milwaukee, WI 53201

Facility Name: Point Beach Nuclear Power Plant

Inspection Conducted: July 23-27, 1984

Inspectors: W. G. Snell (Team Leader) — Date: 8/20/84

J. P. Patterson — Date: August 20, 1984

Approved By: M. P. Phillips, Chief
Emergency Preparedness Section — Date: 8/20/84

Inspection Summary

Inspection on July 23-27, 1984 (Report No. 50-266/84-13(DRSS); 50-301/84-11 (DRSS))

Areas Inspected: Routine, unannounced inspection of the following areas of the Emergency Preparedness Program: emergency detection and classification; protective action decisionmaking; notifications and communications; changes to the emergency preparedness program; shift staffing and augmentation; knowledge and performance of duties (training); licensee audits; and licensee actions on previously identified emergency preparedness items. The inspection involved 157 inspector-hours onsite by two NRC inspectors and two consultants.

Results: Three apparent items of noncompliance were identified in three areas: failure to review Emergency Action Levels with the State of Wisconsin (emergency detection and classification); failure of Shift Superintendents to make an adequate offsite protective action recommendation (protective action decision-making); and failure to review annually the adequacy of interfaces with State and local governments (licensee audits). No items of noncompliance or deviations were identified in the remaining five areas inspected.

DETAILS

1. Persons Contacted

J. Zach, Plant Manager
*R. Link, Superintendent Engineering, Quality and Regulatory Services
*J. Knorr, Emergency Planning Coordinator
*C. Krause, Senior Project Engineer, Licensing
*G. Maxfield, Superintendent, Operations
T. Garot, Shift Superintendent
R. Mulheron, Shift Superintendent
I. Bleeker, Shift Superintendent
R. Mitchell, Shift Superintendent
L. Kamyszek, Shift Superintendent
G. Rau, Duty Technical Advisor
N. Hoefert, Duty Technical Advisor
B. Fromm, Duty Technical Advisor
T. Sheley, Operations Supervisor
A. Shedlosky, Operations Supervisor
D. Lakin, Operations Supervisor
C. Zalewski, Senior Clerk
H. Gleason, Emergency Preparedness Training
R. Heiden, Project Engineer, Quality Assurance, Corporate
E. Lipke, Superintendent, Regulatory Affairs
D. Stevens, Information Center Assistant
P. Glessner, Fire Protection Supervisor

*R. Hague NRC Resident Inspector

*Denotes those present at the exit interview on July 27, 1984.

2. Emergency Detection and Classification (82201)

The inspectors reviewed the Point Beach Emergency Plan and Emergency Plan Implementing Procedures (EPIPs) to determine the existence and adequacy of Emergency Action Levels (EALs) based on actual in-plant indications and offsite and onsite monitoring results and indications. The EALs contained in Appendix B of the Emergency Plan and in Table 1-1 of EPIP 1.1, specified plant conditions and listed possible in-plant indications (by annunciator number or meter indication) that correspond to available monitoring results and indicators.

A review was performed of EPIP 1.1, Initial Classification, against Appendix 1 of NUREG-0654, Revision 1 and against Chapter 14 of the Point Beach Nuclear Plant (PBNP) Final Safety Analysis Report. Five shifts of Shift Superintendents, Operations Supervisors and Duty Technical Advisors were walked through scenarios using the EPIPs for making emergency classifications. The following weaknesses were noted.

. The EALs provided no emergency classification for security threats. Instead, they referenced the Modified, Amended Security Plan (MASP).

However, a review of the MASP indicated that it makes no provision to classify security threats. NUREG-0654, Revision 1 specifies a security threat as an Unusual Event, ongoing security compromise as an Alert, imminent loss of physical control of the plant as a Site Area Emergency, and loss of physical control of the facility as a General Emergency. None of these classifications are made in the EALs or MASP.

- The set of initiating conditions relating to loss of two out of three fission product barriers considers only the case of loss of cladding and primary system with a subsequent challenge to containment. Other combinations such as loss of containment integrity and loss of primary system integrity with a potential for fuel cladding failure are not considered. In addition, the only prescribed method of verifying cladding loss is a coolant sample analysis showing greater than 300 μCi/cc of iodine-equivalent. Other, more rapid methods of verifying cladding loss or its potential such as containment radiation monitors, reactor vessel level and incore thermocouples have not been included as indicators. The only indicators used for determining that a challenge to containment exists are containment pressure and status of coolers and spray. Indications such as H_2/O_2 concentrations, containment isolation valve status, and purge exhaust process monitors are not listed.

- Section 8 of the EALs (Appendix B of the Emergency Plan dated March 30, 1984) classifies loss of offsite and all onsite AC power with loss of all auxiliary feedwater for more than two hours as a Site Emergency. In addition, Section 6 of the EALs classifies a transient initiated by loss of feedwater and loss of auxiliary feedwater for greater than one hour as a Site Emergency. During a telephone conference call with the licensee on August 3, 1984, the licensee stated that both these EALs should be General Emergencies. The change from General to Site Emergency was a typographical error. The licensee committed to have this corrected by September 1, 1984.

- A station blackout for greater than 15 minutes is classified as a Site Emergency, while a station blackout for less than 15 minutes is not classified. The latter situation should be classified as an Alert since by definition, the purpose of an Alert is to assure that emergency personnel are readily available to respond if the situation becomes more serious. As it stands now, no notifications would be made until a Site Emergency was declared.

- Interviews and walkthroughs with Shift Superintendents determined that four out of five had difficulty declaring a General Emergency when confronted with a core melt sequence with no hope of mitigation until after core melt was in progress. This problem was caused by the lack of initiating conditions for a General Emergency in Table 1-1 of EPIP 1.1. One group insisted that a release must be in progress to warrant declaration of a General Emergency.

Based on the number of weaknesses noted in the EALs, the licensee should carry out a detailed review of all their EALs, adding newly installed (R.G. 1.97) instrumentation as indicators for event classification, adding core melt sequences that can lead to a General Emergency, and addressing security threats as classifiable events. The licensee is urged to review Appendix 1 of NUREG-0654, Revision 1 from the standpoint of relating the purpose and description of the emergency classes to the example initiating conditions. This will be tracked under Open Item No. 266/84-13-04, 301/84-11-04.

10 CFR 50.54(q) states in part that a licensee shall follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the standards of 50.47(b). 10 CFR Part 50, Appendix E, Paragraph IV.B states that EALs are to be reviewed annually with State and local governmental authorities. A review of licensee records and discussions with the Division of Emergency Government within the State of Wisconsin indicated that this review was last conducted in November of 1982. This is in noncompliance with the regulations. This will be tracked as Open Item No. 266/84-13-01; 301/84-11-01.

Based on the above review, one violation was identified.

3. Protective Action Decisionmaking (82202)

The inspectors reviewed the PBNP Emergency Plan Implementing Procedures (EPIPs) to determine their adequacy in allowing personnel to correctly analyze conditions and make timely and correct protective action recommendations. Procedures were reviewed against applicable regulations and guidance to ensure consistency. Emergency preparedness organizational structure in the EPIPs was reviewed to determine if lines of authority and responsibilities for protective action decisionmaking were stated clearly.

Interviews and walkthroughs of five Shift Superintendents were conducted utilizing a detailed accident scenario and numerous short problems. All five Shift Superintendents were assisted by the Duty Technical Advisor and/or an Operating Supervisor. In all cases, persons interviewed could not make a protective action recommendation after declaring a General Emergency with a core melt in progress, several thousand rem/hr in containment, and pressure, temperature and H_2 increasing rapidly. In all cases personnel were given over 15 minutes of dedicated time to consider the situation and review the EPIPs after having declared the General Emergency.

Section 5.0 of Chapter 6.0 of the March 30, 1984 revision to the Emergency Plan states in part that recommendations of protective actions to be taken offsite will be made only by the Emergency Support Manager, recognizing that at the beginning of an emergency evolution, the Shift Superintendent and/or DCS will have the responsibility and authority of the Emergency Support Manager. 10 CFR 50.54(q) states in part that a licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards of 50.47(b) of this part and the requirements in Appendix E to this part. The fact that the Shift Superintendent could not make an adequate protective action recommendation is in noncompliance with the regulations. This will be tracked as Open Item No. 266/84-13-02, 301/84-11-02.

A review of the EPIPs in conjunction with the walkthroughs led the inspector to conclude that inadequacies in the EPIPs as well as insufficient training both contributed to the inability of the Shift Superintendents to make an adequate protective action recommendation. The list below contains a sample of the types of weaknesses noted in the procedures and walkthroughs:

- Four out of five of the groups that walked through a scenario were not aware of and did not locate Attachment 1.5-3 to EPIP 1.5, Flow Chart for General Emergency Offsite Protective Decisions, in attempting to make protective action recommendations. The one group that found the flowchart had never seen it before and did not understand its use.

- Section 5.1 of EPIP 5.1, General Emergency - Immediate Actions, described the responsibilities of the Shift Superintendent. This procedure never specifies the Shift Superintendent as having the initial responsibility of the Emergency Support Manager to make a protective action recommendation, nor does it direct the Shift Superintendent to Attachment 1.5-3 of EPIP 1.5.

- Form EPIP-13, Status Update Form, is provided in the EPIPs for use in updating offsite authorities on plant conditions and protective action recommendations. However, EPIP-13 is not referenced in any of the EPIPs, which means there is no guidance given concerning the responsibility for filling out the form and transmitting its contents.

- In EPIPs 5.1 through 5.3 dealing with a General Emergency classification, several persons are directed to fill out EPIP-12, Initial Incident Report Form, including the Plant Operations Manager, Designee A and Designee B. Assigning three persons to fill out one form could lead to a duplication of effort, especially since the EPIPs do not specify who appoints Designee A and Designee B, who they are, or where they are located.

- Section 5.1.9 of EPIP 1.8 directs the user to, "sum the values on EPIP-34, Section 4.0, to determine the gross Xe-133 equivalent release rate." There is no Section 4.0 on EPIP-34; it should state Section D.8.

  Section D.9 of EPIP-34 indicates that a gross Xe-133 equivalent release rate can be computed from a grab sample. However, the procedure does not provide assumptions, conversion factors or formulas to accomplish this computation.

As a result of numerous weaknesses identified in the EPIPs, the licensee should undertake a comprehensive review of their EPIPs to correct the above types of problems. This will be tracked under Open Item 266/84-13-05, 301/84-11-05.

Based on the above review, one violation was identified.

4. Notifications and Communications (82203)

The inspector reviewed the licensee's procedures for notifying onsite emergency response personnel and offsite agencies during an emergency event. EPIPs 2.2, 3.2, 4.2, and 5.2 specify the notification procedures for plant and company personnel for each of the four emergency conditions. EPIPs 2.3, 3.3, 4.3, and 5.3 establish the initial offsite agency notification actions for each of the four emergency classifications. Notification of State and local offsite agencies must be initiated as soon as possible after the Unusual Event classification and within fifteen minutes at the Alert, Site Emergency, and General Emergency classifications. The Emergency Response organization notifications are made by telephone. However, key company personnel may be notified by the plant paging system which is described in EPIP 14.2.

The telephone list for augmentation of licensee emergency personnel is updated quarterly and listed in Form EPIP-22. This call list was spot checked for accuracy and found to be satisfactorily complete.

The offsite messages for notifying emergency response personnel were examined and found to be adequate for both initial and status update reports. As an improvement item the licensee should consider establishing a similar initial message sheet for use during plant and company personnel notifications.

Communication equipment in the emergency facilities were spot checked for operability and found to be available and functional. A communications check of the NRC's Emergency Notification System line was performed and found to be acceptable. The licensee provided documentation that they have been performing a monthly check from each of the emergency response facilities on this system since March 1984.

The inspector reviewed the licensee's procedures to assure that communications equipment operability checks are also being performed for systems used to notify State and local emergency response organizations. These communication drills were being performed as required and were documented acceptably.

Monthly tests of the prompt notification sirens are being performed in conjunction with the Manitowac County Sheriff's Office. The licensee was not able to produce records since February 1984 relating to this siren testing; however, the Manitowac County Sheriff's office was contacted and verified that this testing is being performed monthly and documented through their office. Since the licensee has the responsibility to assure this testing is performed, it is recommended that they work with the Sheriff to obtain the records in a more timely manner.

From the test records that were available for review and discussions with the Manitowac County Sheriff's office, the inspector determined that failures are routinely occurring each month. The licensee's Emergency Preparedness Coordinator is verbally informed of the results of these tests and is responsible for corrective actions on system maintenance.

Although no records were available for review, the licensee stated they were working to correct the problem with the sirens. The licensee's progress in this matter will be tracked under Open Item No. 266/84-13-06, 301/84-11-06.

Based on the above review, no violations or deviations were identified.

5. Changes to the Emergency Preparedness Program (82204)

The inspectors reviewed documentation related to changes in the Emergency Plan and the EPIPs with regard to distribution to onsite and offsite personnel, State and local governments, and the NRC. This review concluded that changes were being submitted to the NRC within approximately 30 days after they are formally issued. However, no documentation to substantiate this was available. Reviews by NRC Region III of Emergency Plan changes made in November 1983, January 1984, and June 1984 determined that none of these plan changes decreased the effectiveness of the plan.

The inspectors verified that changes in the Emergency Plan and EPIPs were being reviewed by management, up to the Plant Manager level where required. A cover sheet to verify management review and approval plus the topic of revision and the person responsible for originating that revision is attached to the procedure, and after the approval chain is completed and verified, the sheet is detached from the procedure and put in a permanent microfilm retention file. Each section of the Emergency Plan and each individual EPIP change history is kept in this microfilm file.

The inspection identified no major changes to the emergency program organizational structure or the administration of the emergency preparedness program.

Based on the above review, no violations or deviations were identified.

6. Shift Staffing and Augmentation (82205)

The inspector reviewed the physical and administrative aspects of the shift staffing and augmentation procedures. The licensee has implemented the minimum shift staffing levels that were requested and subsequently approved by the NRC in a letter to WEPCo dated June 10, 1983. Part of the basis for the staffing levels the NRC approved for the Point Beach site was the licensee's commitment to augment the staff with Duty and Call Superintendents (DCS) within 30 minutes. A review of a shift augmentation drill conducted on January 5, 1984, showed that three DCSs could have arrived within 30 minutes. Sufficient additional personnel could also have arrived within 30 and 60 minutes to augment adequately the emergency organization.

Shift Augmentation is initiated by the Shift Superintendent contacting the Duty and Call Superintendent (DCS) via telephone or pager. The DCS then contacts a secondary DCS and the Duty and Call Chemistry and Health Physics Supervisor to discuss manpower needs. These personnel then continue the augmentation process by contacting other necessary personnel.

The licensee has established an annual shift staffing augmentation drill. Because an exception was granted the licensee to deviate from the staffing levels indicated in Table B-1 of NUREG-0654, Revision 1, the conducting of those drills should be specified in the Emergency Plan on a semi-annual basis. This is to ensure that the licensee will provide an ongoing verification that the commitments made on the timeliness of shift augmentation are being maintained. This will be tracked under Open Item No. 266/84-13-07; 301/84-11-07.

Based on the above review, no violations or deviations were identified.

7. Knowledge and Performance of Duties (Training) (82206)

The inspector reviewed the licensee's organizational preparedness in the areas of employee training and emergency drills and exercises as outlined in Chapter 8.0 of the Emergency Plan. It was determined that a training program has been established for emergency preparedness. All Point Beach Nuclear Plant (PBNP) employees have been provided basic emergency response training during the general employee Training Program. All personnel not assigned major emergency response duties are retrained biannually in the content of the Emergency Plan and EPIPs. Personnel who are assigned major roles in the emergency response organization are provided annual training on substantive changes in the Emergency Plan and EPIPs in addition to participation in specialized training for their responsibilities. In addition, personnel participate in drills and exercises to ensure that they are capable of performing their assigned emergency response functions. The inspector reviewed training lesson plans and drill scenarios to assure personnel have been appropriately trained. The lesson plans and drill scenarios are adequate.

The licensee has provided annual training for offsite emergency support personnel in conjunction with Kewaunee Nuclear Power Plant. The licensee produced records to document this training was provided on September 29, 1983. The licensee also provides the opportunity for training for members of the media and general public in conjunction with Kewaunee Emergency Preparedness personnel.

Communication drills are held and documented as required with Federal, State, and local governments (see Notifications and Communications Section).

The inspector verified that fire drills are being conducted in accordance with the PBNP Fire Protection Manual. This includes one unannounced drill, one backshift drill and one additional drill of any type per year for all qualified Fire Brigade members. The list of qualified Fire Brigade members is updated at least quarterly. Biannual training is provided to all members of the Fire Brigade at the Waukesha County Technical Institute and includes Point Beach specific training objectives.

Medical emergency drills are conducted with Two Rivers Community Hospital personnel on a biannual schedule in conjunction with the annual emergency exercise.

The inspector verified that radiological monitoring and health physics drills were conducted both onsite and offsite semiannually.

Based on the above review, no violations or deviations were identified.

8. Public Information Program (82209)

To meet the provisions of 10 CFR Part 50, Appendix E, Section IV.D.3 and 50.47(b)(7), the licensee annually distributes an Emergency Planning Information Brochure in conjunction with the Kewaunee Nuclear Plant. The brochure includes information for residents within the overlapping EPZs of each nuclear plant. The most recent distribution of this brochure was in August, 1983. The Emergency Preparedness Coordinator informed the inspectors that brochure changes planned for the next annual distribution will delay its dissemination to the public until about October 1984.

Based on the above review, no violations or deviations were identified.

9. Licensee Audits (82210)

The inspectors reviewed the annual audit of the PBNP emergency preparedness program that was conducted on April 17-18, 1984, as required by Chapter 8.0 of the Emergency Plan and 10 CFR 50.54(t) of the regulations. Personnel involved in the audit were determined to have no direct responsibility for implementation of the emergency preparedness program.

The audit identified 13 deficiency or nonconforming items. Three of the 13 items are in the same area and similar to items identified during the 1983 audit. The audit report stated that "corrective actions proposed for the 1983 audit findings have either not been followed or are not providing the necessary corrective results." This included retraining of personnel in regard to significant changes to the Emergency Plan and EPIPs and the updating of TSC drawings. The auditors concluded that implementation of both the Emergency Plan and EPIPs was questionable in certain areas, although as written they appeared adequate. The auditors also concluded that to better determine the adequacy of the Emergency Plan and EPIPs, it would be necessary to observe various drills and exercises. A written response addressing all items identified in the April 1984 audit was signed by the Emergency Planning Coordinator and approved by the Plant Manager on June 21, 1984.

The inspectors review of the April 17-18, 1984 audit report determined that it was not sufficiently complete, namely, no evaluation was performed regarding the adequacy of interfaces with State and local governments. Since this is specifically required by 10 CFR 50.54(t), but was not done, this is an item of noncompliance. This will be tracked under Open Item No. 266/84-13-03, 301/84-11-03.

Based on the above review, one violation was identified.

10. Licensee Actions on Previously Identified Emergency Preparedness Items

a. 266/82-02-05, 301/82-02-05; 266/82-02-15, 301/82-02-15; 266/83-14-04, 301/83-14-04; 266/83-25-01, 301/83-23-01; 266/83-25-02, 301/83-23-02; 266/83-25-03, 301/83-23-03; 266/83-25-04, 301/83-23-04 (Closed) Letters of Agreement

A review of the Letters of Agreement between the Point Beach Nuclear Plant and various support organizations indicated that all letters were less than two years old except one. The one remaining which was not current is Doctors Clinic, Ltd., which still has a 1979 date. Efforts have been made by the Emergency Preparedness Coordinator to update this Letter of Agreement; however, until the WEPCo Medical Director approves this new letter and its contents, it will not be official.

An internal letter to the Medical Director dated January 24, 1984, requesting his approval to update this letter has been sent by the Emergency Coordinator. No reply has been received as of July 27, 1984. This will be tracked under new Open Item No. 266/84-13-08, 301/84-11-08.

A Letter of Agreement with the Bechtel Power Corporation was issued March 12, 1984. A Letter of Agreement for ambulance service was issued on April 16, 1984 with the Mishicot Area Ambulance Service. The Two Rivers Ambulance Service is now a backup to the Mishicot Area Ambulance Service.

b. 266/82-02-06, 301/82-02-06; 266/83-25-05, 301/83-23-05 (Closed) Normal Plant Organization and Shift Augmentation

The inspector reviewed Chapter 5.0 of the March 30, 1984 revision to the Emergency Plan. Section 2.0 specified that the Communicator and the Rad/Chem Tech were part of the normal plant organization. Section 2.0 also addressed the timeliness of augmentation of emergency personnel (within one hour), but it referenced the wrong figures and did not specify the personnel that should respond within 30 minutes as outlined in Table 2 of Supplement 1 of NUREG-0737. The Emergency Plan still needs to be clarified to indicate which personnel will augment the emergency organization within 30 minutes. This will be tracked under new Open Item No. 266/84-13-09; 301/84-11-09.

c. 266/82-02-07; 301/82-02-07; 266/83-25-07; 301/83-23-07 (Closed) Space for State and Local Agencies in the EOF

Chapter 7.0, Section 2.1 of the June 8, 1984 revision to the Emergency Plan was reviewed and determined to specify that up to 700 square feet of space could be provided to State and local agency personnel in the EOF.

d. 266/82-02-10, 301/82-02-10; 266/83-25-11; 301/83-23-11 (Closed) Rumor Control

Chapter 7.0, Section 2.6 of the Emergency Plan has addressed rumor control, stating that rumors will be handled by the Joint Public Information Center via rumor control phone lines.

e. 266/82-02-11; 301/82-02-11; 266/83-25-12; 301/83-23-12 (Closed) Activation of EOF

Chapter 7.0, Section 2.1 of the June 8, 1984 revision to the Emergency Plan was reviewed and determined to specify that the EOF will be activated within one hour of the declaration of a Site or General Emergency.

f. 266/82-02-12; 301/82-02-12; 266/83-25-14; 301/83-23-14 (Closed) Meteorological Data

Chapter 7.0 of Emergency Plan revision dated June 8, 1984 was reviewed. Section 2.1.11 stated that meteorological data would be provided to the EOF via phone communication from the TSC. Section 2.2.6 stated that meteorological data would be provided to the TSC via phone communication from the Control Room.

g. 266/82-02-13, 301/82-02-13; 266/83-18-03, 301/83-17-03; 266/83-25-15, 301/83-23-15 (Closed) Assembly, Accountability and Evacuation

A review of the March 30, 1984 revision of the Emergency Plan determined that accountability should take no longer than 30 minutes per Chapter 6.0, Section 5.1.1.e. However, it is still not clear that non-essential personnel will be evacuated at a Site or General Emergency as specified in Criterion II.J.4 of NUREG-0654, Revision 1. Non-essential personnel should automatically be evacuated at a Site or General Emergency unless events are in progress which would indicate it would be more prudent not to evacuate. This remaining portion of the above items will be tracked under new Open Item No. 266/84-13-10, 301/84-11-10.

h. 266/82-02-17, 301/82-02-17; 266/83-25-18, 301/83-23-18 (Closed) Annual Emergency Preparedness Exercises

The June 8, 1984 revision of Chapter 8.0, Section 3.2 of the licensee's Emergency Plan has clarified that an emergency response exercise will be held annually.

i. 266/82-02-22, 301/82-02-22 (Closed) Completion of Permanent EOF

The permanent EOF was operational as of January 1, 1984. The inspector toured this facility and verified it was functional.

j. 266/83-14-01, 301/83-14-01 (Closed) Meteorological Data

A review of EPIP 1.4, Revision 10 dated June 8, 1984 was made and it was determined that sigma theta would not be used for wind speeds less than 3 mph, and that Attachment 1.4-3 should instead be used to determine stability class.

k. 266/83-14-02; 301/83-14-02 (Closed) Incorrectly Referenced Procedures

The inspector reviewed the Emergency Plan Implementing Procedures and verified that incorrect references in EPIPs 2.3, 3.3, 4.3, and 5.3 have been corrected.

l. 266/83-14-03, 301/83-14-03 (Closed) Protective Action Decisionmaking

A review of EPIP 1.5 dated January 27, 1984 determined that additional guidance has been given to the Technical Support Manager for making a protective action recommendation based on core and containment conditions.

m. 266/83-25-06; 301/83-23-06 (Closed) Response Times for Off-Site Support Groups

Chapter 5.0, Sections 5.2.3 and 5.2.4 of the March 30, 1984 revision to the Emergency Plan were examined and found to specify the response times for the Department of Energy and the Coast Guard.

n. 266/83-25-08, 301/83-23-08 (Closed) Emergency Action Levels

Table 1-1 of EPIP 1.1 containing Emergency Action Levels has been added to Appendix B of the Emergency Plan revision dated March 30, 1984.

o. 266/83-25-09, 301/83-23-09 (Closed) Notification of Unusual Event

Section 7.1 of Chapter 5.0 of Emergency Plan revision dated March 30, 1984 specified that notification of offsite authorities should be initiated as soon as possible after an Unusual Event declaration.

p. 266/83-25-10, 301/83-23-10 (Closed) Joint Public Information Center (JPIC)

The March 30, 1984 revision of Appendix A to the Emergency Plan was reviewed and it was determined that Figures 1 and 2 now specify JPIC and JPIC Director, which are the terms used throughout the Emergency Plan. The June 8, 1984 revision to Chapter 7.0 of the Emergency Plan specified in Section 2.6 that the JPIC would be activated for a Site or General Emergency.

q. 266/83-25-13, 301/83-23-13 (Closed) Offsite Environmental Data

The inclusion of EALs into Appendix B of the March 30, 1984 revision to the Emergency Plan provides a source of offsite seismic data. Onsite hydrological monitoring is considered adequate.

r. 266/83-25-16, 301/83-23-16 (Open) Protective Action Recommendations

The addition of Table 4-1 to Chapter 4.0 of the March 30, 1984 revision to the Emergency Plan has clarified the recommendations for making protective actions based on actual or projected releases. However, guidance for making recommendations based on deteriorating plant conditions (e.g., NRC IE Information Notice 83-28) have not been included in the Emergency Plan.

s. 266/83-25-17, 301/83-23-17 (Closed) Evacuation Routes and Survey Points

The June 29, 1984 revision of Appendix C to the Emergency Plan was reviewed and contained maps showing evacuation routes and radiological survey points.

t. 266/83-25-19, 301/83-23-19 (Open) Monthly Communication Checks

Section 3.3 of Chapter 7.0 and Section 3.4.1 of Chapter 8.0 in the June 8, 1984 revision of the Emergency Plan have clarified that the NRC's Emergency Notification System (ENS) line will be tested on a monthly basis. However, Section 3.4.1 states that communications between the licensee and the NRC Operations Center will be tested on an alternating basis between the Control Room, the TSC and EOF. 10 CFR Part 50, Appendix E, IV.E.9.d states that such communication shall be tested monthly from each of these emergency facilities. Section 3.4.1 should be corrected to reflect the regulatory requirements.

u. 266/83-25-20, 301/83-23-20 (Closed) Post-Accident Sampling System

The June 8, 1984 revision of the Emergency Plan stipulates in Chapter 8.0, Section 3.3, that the annual exercise will include a post-accident sample acquisition.

v. 266/83-25-21, 301/83-23-21 (Closed) Letters of Agreement

Section 4.0 of Chapter 8.0 of the June 8, 1984 revision of the Emergency Plan states that the Letters of Agreement between the licensee and outside organizations and agencies will be reviewed annually.

w. 266/84-02-01, 301/84-01-01 (Closed) Bio-Pak 60s

Emergency Plan Chapter 7.0, Section 5.0 dated June 18, 1984 states that, "To ensure that operating shift and other personnel can remain self-sufficient, ..., respiratory equipment, ... are maintained in the control room." In an emergency situation, only six persons are required to be in the control room (shift supervisor, operations supervisor, three reactor operators, and a duty technical advisor).

A review of respiratory equipment in the control room determined there were two SCBAs, seven Bio-Pak 60s, and six supplied air breathing masks. Therefore, there is sufficient respiratory protection in the control room without taking the Bio-Pak 60s into consideration.

11. Exit Meeting

The inspectors met with licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on July 27, 1984. The inspectors summarized the scope and findings of the inspection, including the items of noncompliance.