U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-346/85-006(DRSS)

Docket No. 50-346 License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Facility Name: Davis-Besse Nuclear Power Station, Unit 1

Inspection At: Davis-Besse Site, Oak Harbor, OH

Inspection Conducted: February 20-22, 1985

T. Ploski

Inspector: T. Ploski 3/7/85
Date

T. Ploski for

Approved By: M. P. Phillips, Chief 3/7/85
Emergency Preparedness Section Date

Inspection Summary

Inspection on February 20-22, 1985 (Report No. 50-346/85-006(DRSS))
Areas Inspected: Special, unannounced inspection of the following areas of the emergency preparedness program: Licensee actions in response to the Systematic Assessment of Licensee Performance (SALP) evaluation of this functional area; knowledge and performance of duties (training); and licensee audits. The inspection involved 35 inspector-hours onsite by two NRC inspectors.
Results: No items of noncompliance or deviations were identified during the course of this inspection.

DETAILS

1. Persons Contacted

*T. Murray, Assistant Vice President, Nuclear Operations
T. Myers, Nuclear Services Director
*J. Hirsch, Emergency Planning Supervisor
*C. Greer, Operations Quality Assurance Supervisor
*B. Geddes, Quality Assurance Department
*S. Wideman, Nuclear Licensing Staff
*J. Lietzow, Nuclear Licensing Staff
*J. Faris, Emergency Duty Officer
*N. Flood, Emergency Planning Staff
C. Daft, Director, Quality Assurance Division
G. Reed, Emergency Preparedness Consultant
R. Durdel, Emergency Planning Staff

*Indicates those present at the February 22, 1985 exit interview.

2. Licensee Initiatives Following the SALP IV Evaluation

One purpose of the inspection was to determine, prior to the receipt of the licensee's supplementary response to the SALP report, progress made since the previous inspection (Inspection Report 50-346/85-002) on several activities affecting the emergency preparedness program. The following paragraphs summarize the inspectors' findings.

a. Changes to the Emergency Duty Officer (EDO) Program

By correspondence dated February 4, 1985, the licensee submitted its formal response to the NRC on the agency's SALP evaluation. In that submittal, the licensee set a milestone date of March 15, 1985 for establishing the permanent (Lead) EDO position. Based on discussions with cognizant licensee personnel, the inspector determined that the mid-March date represented the time by which the licensee's Employment Department would receive a formal Personnel Requisition and would then initiate a Career Opportunity Announcement for current employees. The licensee indicated that it also planned to simultaneously seek qualified candidates for the Lead EDO/Emergency Planning Supervisor position from outside its organization. The inspector determined that the Employment Department had received the Personnel Requisition during the week of February 18, 1985 and that steps had also been initiated for identifying outside candidates for the position. As the future supervisor of the Lead EDO, the current Emergency Planning Supervisor indicated that she would have a major role in the candidate review and selection process. As it was still too early to determine when the position would actually be filled, the licensee could not commit to having the new Emergency Planning Supervisor fully qualified to function as Lead EDO for the 1985 exercise. The licensee stated their intention to continue utilizing their current EDO concept (a group of about twelve persons who rotate the duty on a weekly basis) until such time as the Lead EDO has been hired and

trained. At that time, the Lead EDO and about four alternates, chosen from the current group of EDOs, would replace that group of EDOs.

Regarding the proposed use of Shift Technical Advisors (STAs) along with Shift Supervisors (SSs) as interim EDOs, the licensee planned to train both types of personnel as interim-EDOs during March, 1985. Annual retraining of persons assigned to the EDO position in the Emergency Control Center (ECC) would take place concurrently. Based on several telephone contacts with the NRC during the Fall of 1984, the licensee had satisfied itself that the use of STAs as interim EDOs did not conflict with NRC guidance on the role of the STA.

The licensee's progress toward hiring a Lead EDO/Emergency Planning Supervisor is satisfactory.

b. Tracking of Improvement Items Identified by the Licensee

In the aforementioned response to the SALP report, the licensee indicated that the Activity Scheduling System would be developed by March 1, 1985 and would be formally implemented for "future commitments" by September 30, 1985. Based on discussions with the licensee, the inspector concluded that March 1st signified the date by which the system's computer software would be operational, while September 30th represented the date by which all related procedures would be approved and the addition of "commitments" to the computer software would largely be completed. The inspector reviewed sample computer printouts from the system and discussed its status with the licensee. The software was considered operational, but subject to modification. Sample outputs indicated the user's ability to generate information listings by activity or commitment type; by responsible person or department; and by commitment status (all, or only open items). Besides the activity or commitment type, the various sample outputs contained provisions for other relevant information including frequency of activity, commitment reference documents, due date, milestones, responsible personnel, and budgeted and actual manhours.

The licensee had begun drafting procedures on the use of the Activity Scheduling System. Draft procedures reviewed by the inspector consisted of Supplementary Instructions for the Emergency Planning staff on the system's computer and related software, and a Nuclear Practices and Procedures (NPP) series procedure regarding system implementation. The NPP series procedure would require review and approval by all Nuclear Mission Division Directors and their supervisors prior to formal implementation. The Emergency Planning Supervisor indicated that the use of the Activity Scheduling System as a tracking system would be analogous to the licensee's expanded NRC Commitment Tracking System in that overdue items would be periodically identified to persons above the division director level.

The licensee indicated that clarification of the words "future commitment" used in the SALP response would be forthcoming in its March, 1985 supplementary SALP response. However, the inspectors understood from discussions with the licensee that "commitments" would include emergency preparedness drills and exercises, any resulting weaknesses identified from NRC reports or internal critiques, audit results, and appropriate recommendations from emergency preparedness training sessions. The licensee anticipated that, due to the demands of preparing for the 1985 exercise, the actual adding of such current and future "commitments" to the system's software would mainly occur between the exercise and lat September, 1985.

The licensee was on schedule for having the Activity Scheduling System computerized.

c. Upgraded Goals and Objectives Program

The inspector reviewed copies of the Emergency Planning Group's short-term objectives for improvement, as listed in Inspection Report 50-346/85-002. The associated action plans have been completed by the Emergency Planning Supervisor and have been forwarded to the Vice President, Nuclear. All three objectives have been categorized as "critical." The objective of finalizing the boundaries of the plume exposure pathway Emergency Planning Zone (EPZ) has been given a target completion date of July 1985. The action plan addressed the needs to work with State of Ohio and Ottawa County officials to resolve any problems on the finalized EPZ boundary submittal, and the need to submit an associated revision to the Emergency Plan for NRC approval. The licensee has categorized this objective as having an average potential for achievement by the target date. The objective of improving the technical qualifications of the Emergency Planning Group and emergency response organization has been given a target completion date in August, 1985, with an above average potential for achievement. The associated action plan addressed the potential to make organizational changes based on a review of emergency planning effectiveness, the development of an expanded hands-on training schedule, and the completion of upgraded emergency response organization training before the 1985 exercise. The objective of implementing the Corporate Emergency Plan and completing associated training has been given an average potential for achievement by the July 1985 target date.

The licensee was on schedule for developing approved action plans for the Emergency Planning Group's 1985 goals and objectives.

d. Emergency Preparedness Exercise Preparation

In its February 4, 1985 response, the licensee indicated that an exercise Scenario Development Committee, having appropriate areas of expertise, had been established. The inspector reviewed correspondence dated January 29, 1985, from the Assistant Vice President, Nuclear Operations, to select licensee personnel which addressed the

establishment of the committee and the need for personnel to complete scenario development tasks in a timely and accurate manner, despite the additional workload. From internal correspondence, the inspector determined that the committee held its first meeting on February 15, 1985. The station's Operations Engineer has been assigned as committee chairman, assisted by nine licensee personnel and a number of consultants. Licensee personnel were drawn from a number of staffs, including operations, engineering, Chemistry and Health Physics, environmental, computer programming, security, public information, and emergency planning. Tentative committee meeting dates and task completion milestones have been established. The milestones were sufficiently detailed to indicate that the licensee planned to submit to the NRC a "75-day package," consisting of scenario objectives and a draft sequence of events, and a "45-day package," consisting of a detailed sequence of events other scenario data. The licensee's tentative schedule contained provisions for interfacing with State, County, and FEMA representatives on offsite objectives and sequences of events and for technically reviewing both the 75 and 45-day packages prior to submittal to the NRC.

The licensee's progress in this area of emergency preparedness is satisfactory.

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

The inspectors reviewed an intra-company memorandum dated February 1985, from the Assistant Vice President for Nuclear Operations to all Nuclear Mission employees which stressed the need to attend required training on the scheduled dates. Appropriate staffs have been requested to notify him of any employee who fails to attend a scheduled training session.

The inspectors reviewed the lesson plan, student handout, attendance sheets, the Training Department's student critique forms, and tests associated with emergency preparedness training provided to security force personnel. Bimonthly, one-day sessions have been scheduled for small groups of security officers between January and July, 1985. The January and February sessions were conducted when indicated on the Master Training Schedule. The lesson plan, student handout, and examination were prepared by a consultant and approved by the Emergency Planning Supervisor, Nuclear Services Director, and Nuclear Training Manager. A consultant has been conducting the training sessions. The lesson plan and handout were adequately detailed. Lesson objectives and course content were appropriate to the information needs, technical level of understanding, and emergency roles of security personnel. The various kinds of interfaces between the security force and licensee and other emergency response personnel were emphasized by conducting a tabletop exercise showing these interfaces during the course of an escalating emergency and subsequent recovery operations. Based on test scores and student critique forms, the information presented has been adequately understood and favorably received.

The inspectors reviewed documentation, with the exceptions of examinations and student critique forms, associated with training given to key Technical Support Center (TSC) personnel during February 1985. These personnel were required to attend either of two, one-day sessions held in the TSC. Portions of the second session were observed by the inspectors. Documentation examined by the inspectors consisted of a General Information Review (GIR) to be read by attendees prior to the training session, a student handout, and a detailed lesson plan. These documents were approved by the same three individuals who had approved the security force's training materials. Topics addressed in the GIR were similar, but more detailed, compared to those contained in the security force training sessions. Fourteen lesson objectives, appropriate to the duties of key TSC staff, were listed in the student handout and were covered in the text. Personnel were given hands-on instruction on the use of RAMTEK terminals, which can be used to display and trend key plant parameters and to perform offsite dose calculations. The sessions included a tabletop exercise, critique, and a written examination. As witnessed by the inspectors, the exercise could better be described as a walkthrough intended to demonstrate various interfaces and other activities within the TSC. Differing opinions were voiced during the self-critique on such matters as the division of responsibilities among key staff; interfaces with the Emergency Control Center (ECC); TSC layout; emergency communications systems usage; and the numbers, desired backgrounds, and duties of support staffs assigned to key TSC personnel. As stated during the critique by the Assistant Vice President for Nuclear Operations, valid concerns and ideas had been expressed, and there was an apparent need for additional TSC training sessions. The inspector voiced his concurrence with that assessment.

Several types of specialized training sessions had been scheduled for March, including the following: EDO training; Operational Support Center (OSC) personnel training; and Emergency Response Facility (ERF) support staff training. The EDO training, to be given to both EDOs and interim-EDOs, would consist of three modules and would address plant systems, dose assessment, and ECC operations. Personnel attending ERF support staff training would be assigned such duties as communicator, logkeeper, or status board plotter in the TSC or ECC. Lesson plans, handouts, and tests for these March training sessions had not yet been finally approved and were not reviewed by the inspectors.

An inspector attended a General Orientation Training (GOT) session, required annually for all persons granted unescorted access privileges within the Protected Area. The emergency preparedness portion of the presentation was adequate, with the exceptions that the slide presentation contained only the former location of the OSC and did not indicate when the OSC would be activated. The presentation contained accurate location information for the other ERFs and indicated when they would be activated. While the instructor provided updated information and offered to answer any questions on the various modules in the presentation, he neglected to mention the new location of the OSC and when it would be activated.

Based on the above findings, this portion of the licensee's program was acceptable; however, the following items should be considered for improvement:

- Prior to the practice exercise, the licensee should conduct TSC activation and operation drills involving both key personnel and their support staffs.

- The slide presentation for the GOT module on emergency preparedness should depict only the current location of the OSC. The presentation should indicate when OSC activation is mandatory.

4. Licensee Audits (82210)

The inspectors reviewed the proposed composition of the Quality Assurance (QA) Department's audit team for the conduct of the 1985 audits, which were scheduled for April and September, and discussed the licensee's response to the SALP findings relative to the audit program.

In their response, the licensee had stated that both the Emergency Planning and Quality Assurance groups would review the audit checklist for QA audit requirements prior to audit initiation, with the review documented in the entrance interview notes. 10 CFR 50.54(t) states in part that "the licensee shall provide for a review of its emergency preparedness program at least every 12 months by persons who have no direct responsibility for implementation of the emergency preparedness program." Based on the text of the response, the independence of the review was not clear; however, during the inspection, licensee personnel agreed to revise their response to clearly indicate that the Emergency Planning Group would review the audit checklist during the audit entrance meeting to ensure that the audit contained adequate scope and depth to address all of the review requirements of 10 CFR 50.54(t). If insufficient scope or depth was identified, the Emergency Planning Group would request the Quality Assurance staff to include additional areas for review, which would either be added to that checklist or incorporated in an additional audit. Only Quality Assurance would develop actual checklist items, and would have, at all times, the authority for determining what would be included in the checklists. No checklist items originally included could be deleted as a result of the Emergency Planning Group's review of the audit checklist. Based on this clarification, the inspectors determined that the Emergency Planning Group was independent from those performing the annual emergency preparedness program review.

The inspectors determined that three individuals would be included on each of the audit teams conducting the 1985 emergency preparedness reviews. The inspectors then reviewed these names against a listing of personnel currently responsible for filling positions in the licensee's emergency response organization. Although none of these individuals were members of the Emergency Preparedness Group, several duplications were noted, which were identified as follows:

a. The lead auditor for both 1985 reviews, who is an auditor in the Operations Branch of the Quality Assurance group, was assigned as an Emergency Duty Officer (EDO). This position is responsible for performing accident assessment, initiating the staffing of the emergency response facilities (i.e., TSC and ECC), and making emergency classifications and protective action recommendations (both onsite and offsite) when the Emergency Control Center (ECC) is activated.

b. The technical assistant auditor for the April 1985 review was assigned as the alternate TSC Manager. This position is responsible for managing the onsite assessment team, and supervises the analysis efforts of Company engineers, NSSS vendor engineers, and the plant staff when the TSC is activated. This position reports to the Station Operations Manager.

c. The technical assistant auditor for the September 1985 review was assigned as an EDO and also was an alternate Radiation Monitoring Team (RMT) Coordinator. The RMT Coordinator reports to the EDO when the ECC is activated.

As noted above, several of the members of the 1985 audit teams were also members of the licensee's emergency response organization. In addition, the inspectors determined that the Quality Assurance Director, who heads the entire QA organization, was also assigned as an EDO and as an alternate Emergency Operations Manager, the latter position responsible for the overall operations of the ECC after it is activated.

Although the QA group does not have any responsibilities for routine activities involving emergency preparedness, the presence of QA auditors in the emergency response organization would appear to indicate that they may not meet the independence requirement stipulated in 10 CFR 50.54(t). According to the QA Director, the Emergency Planning group cannot influence the QA group, and the QA group is independent from the EP group per 10 CFR Part 50, Appendix B criteria. In addition, he stated that by being included in the response organization, QA personnel have the opportunity to attend emergency response training and that their valuable expertise was not lost to the emergency response organization. The inspector stated that training attendance could still be done as part of an audit of emergency response training effectiveness.

The inspectors stated that the independence of the emergency preparedness review program conducted by the licensee would be an Unresolved Item (346/85-006-01) pending further guidance from NRC Headquarters to define what was meant in 10 CFR 50.54(t) by the phrase "having no direct responsibility for implementation of the emergency preparedness program."

As indicated in Inspection Report 50-346/85-002, the QA Department had not closed any of the six findings resulting from Audit No. 1295 conducted during October 1984. The inspector determined that three findings had been closed in January 1985 and that QA staff were satisfactorily tracking progress made towards resolving the remaining three items.

5. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, items of noncompliance, or deviations. An unresolved item disclosed during this inspection is discussed in Paragraph 4.

6. Exit Interview

The inspectors met with the licensee representatives (denoted in Paragraph 1) at the conclusion of the inspection on February 22, 1985. The inspector summarized the scope and findings of the inspection. The licensee agreed to consider these preliminary findings.