

NOV 25 1975

J. P. Stohr, Section Leader, Environmental and Special Projects Section
Fuel Facility and Materials Safety Branch, Region I

INSPECTOR'S EVALUATION
REGION I INSPECTION REPORT NO. 50-219/75-25
JERSEY CENTRAL POWER AND LIGHT COMPANY
OYSTER CREEK NUCLEAR POWER STATION

Nelson + Stohr do not agree.
1. Inspection is a sampling program
2. absolute findings not required

The above referenced report documents an inspection of the licensee's Emergency Drill (Module 82712B) conducted on November 12 and 13, 1975.

The inspection as originally scheduled would have consisted of myself, Mr. Stohr, Mr. Donaldson and Mr. Greenman. With these persons, all essential activities of the drill would have been evaluated, on a sampling basis, by the NRC. With the original contingent of personnel, inspectors would have covered: (1) the Emergency Control Center; (2) the Main Control Room; (3) the onsite Monitoring Team; (4) the offsite Monitoring Team; and, (5) the medical emergency operation. One inspector would have been assigned to items (1), (2) and (4) with the remaining inspector covering items (3) and (5).

With the cancellation of Mr. Donaldson's participation, and the non-participation of Mr. Greenman for reasons outside of my direct knowledge, I feel that the entire spectrum of drill related events was not covered as fully as desired to meet the Module requirement to "...observe the response of the licensee's organization during one of the scheduled drills..."

The licensee's onsite Quality Assurance Organization observed/reported a total of fifty-seven drill related inadequacies; fourteen (14) or 24.56% of the items were identified with respect to the offsite monitoring teams (they monitored two of the three teams) which we did not monitor. Based on these figures, one quarter of the reported problems occurred in an area not monitored by Commission representatives. Of the fourteen (14) items, ten (10) were identified as common to both teams and would, by logical extrapolation, have been observed by an NRC inspector accompanying the remaining offsite monitoring team as originally scheduled.

While I have no reason or evidence to suggest that the licensee's Quality Assurance Audit was inadequate, I am personally of the opinion that observing seventy-five (75%) of the identified areas may not completely fulfill the intention of the module to observe the licensee's organizational response.

3. M.C. requirements can be met with 1 inspector (other regions 1)
4. 2 or 3 may be desirable but even 4 or 5 could not cover everything.

W. A. Ruhlman
Reactor Inspector

cc: P. R. Nelson
E. G. Greenman
C. O. Gallina

W.P.C.
Ruhlman/mjd
11/19/75

*ETX for 11/21
Brunner*

*Nelson
Nelson*

11/25/75

