IE:I Form 12 (Jan 75) (Rev)

# U. S. NUCLEAR REGULATORY COMMISSION

# OFFICE OF INSPECTION AND ENFORCEMENT

### REGION I

IE Inspection	Report No: 50-219/75-25	Docket No:	50-219
	ersey Central Power and Light Company (JCP&L)	License No:	DPR-16
M	adison Avenue at Punch Bowl Road	Priority:	
М	forristown, New Jersey 07960	Category:	С
		Safeguards Group:	
ocation:	Dyster Creek Station, Forked River, New Jersey		nchreanarn angescollthActual Alaman
ype of Licens	see: BWR (GE) 1930 MWt		
ype of Inspec	Routine, Announced, Emergency Drill .		
ates of Inspe	ection: November 12-13, 1975		
ates of Prev:	ious Inspection: October 30 - November 5, 1975		
leporting Ins		· _/	1/24/7. DATE
ccompanying		4	1/24/7 DATE
	J. P/ Stohr, Section Leader		( Mare.
			DATE
			DATE
Other Accompa	nying Personnel: NONE		DATE,
Reviewed By:	1 B. Stahr Souther London		24/75 DATE
	J. P. Stohr, Section Leader	·	
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#### SUMMARY OF FINDINGS

#### Enforcement Action

### A. Items of Noncompliance

1. Violations

None Identified

2. Infractions

None Identified

- 3. Deficiencies
  - a. Contrary to 10 CFR 50, Appendix E, Item IV.D and Section V.D of the Oyster Creek Emergency Plan, there were no arrangements for ambulance service confirmed in writing. Based on a letter of agreement subsequently obtained and facsimiled to Region I, no additional response is required. (Detail 3.a(1) and 3.b(1))
  - b. Contrary to 10 CFR 50, Appendix E, Item IV.E.2 and Sections VI.A and VI.D of the Oyster Creek Emergency Plan, the Emergency Plan had not been reviewed, revised and approved annually or more frequently as required since the Plan's acceptance by the NRC on September 23, 1974. (Detail 3.b(2))

B. Deviations

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None Identified

Licensee Action on Previously Identified Enforcement Action

No previously identified enforcement action in the Area of Emergency Planning.

#### Unusual Occurrences

None Identified

#### Other Significant Findings

#### A. Current Findings

1. Plant Status

During the inspection the pirat was operating at an average power level of 85% (1590 MWt, with an average gross electrical generation of 525 MWe.

2. Acceptable Area

(This is the area, inspected on a sampling basis, for which findings did not involve an Item of Noncompliance, a Deviation, or an Unresolved Item.)

a. Emergency Training Exercise. (Detail 2)

3. Unresolved Items

(This is an item for which, at the conclusion of the inspection, more information was needed to determine if the item was Acceptable, a Deviation or an Item of Noncompliance.)

a. Procedure 905.25 - revision to agree with current practice and the Emergency Plan with respect to the frequency of conducting equipment inventories. (Detail 3.b(3))

## B. Status of Previously Unresolved (Open) Items

1. Report 50-219/75-20

This report identified two (2) Unresolved Items, three (3) Open Items and one item which would be reviewed for completion during a subsequent inspection. These six (6) items, in the order indicated above, were reinspected with current status as indicated below. Details prefacing the item are from the referenced report.

a. Detail 3 - lack of written agreement with off-site ambulance service - based on additional information obtained during this inspection, this item is now an Item of Noncompliance.

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(See Items of Noncompliance, 3.a of the Summary of Findings and Details 3.a(1) and 3.b(1)). The day following the inspection the appropriate letter of agreement was obtained based on a facsimile copy transmitted to Region I by the licensee on November 17, 1975. No additional response is required for this item.

- b. Detail 3 Lack of written agreement with off-site firefighting service - this item was reinspected but remains an Unresolved Item. (Detail 3.a)
- c. Detail 14 Construction of a facility plot plan to aid in recording/evaluating on-site radiological problems during an accident or unplanned release. The licensee had constructed a plot plan and this plan was utilized during the Emergency Training Exercise conducted on November 13, 1975. This item is resolved. (Detail 3.a)
- d. Detail 16 Lack of a preplanned method/procedure for pickup/evaluation of samples taken by installed environmental station following a postulated release. Although still Open at the conclusion of this inspection, the licensee stated that appropriate procedural changes would be incorporated by mid-December, 1975. (Detail 3.a)
- e. Detail 17 Lack of calculated on-site dose rates as a result of postulated accidents. The licensee indicated that based on the time required to review, evaluate and calculate dose rates for all postulated accidents, the process could not be completed, documented and distributed for use until June 30, 1976. This item remains Open. (Detail 3.a)
- f. Detail 7 The licensee's Emergency Training had not been completed by the end (August 5, 1975) of the previous inspection. This training had been completed, according to the licensee's documentation, prior to the start (November 12, 1975) of this inspection. (Detail 3.a)

#### Management Interviews

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A. Entrance Interview

A pre-inspection meeting was conducted on-site at the start of the inspection on November 12, 1975, with the following attendees.

#### Jersey Central Power and Light Company

Mr. J. T. Carroll, Jr., Oyster Creek Superintendent Mr. E. D. Scalsky, Radiation Protection Supervisor

#### United States Nuclear Regulatory Commission, Region I

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Mr. W. A. Ruhlman, Reactor Inspector Mr. J. P. Stohr, Section Leader

The licensee was requested to address/identify:

- Any excessive personnel exposures or releases of radioactive effluents;
- 2. Any impending difficulties that may effect operating safety;
- 3. Recent plant problems including component failures, unusual plant responses or radiological problems; and
- 4. Any items of general interest.

During the pre-inspection meeting the inspector addressed the following:

- 1. General scope of the inspection including estimated duration;
- Identification of records, procedures and documents to be reviewed;
- 3. Personnel to be interviewed; and
- 4. Plans to witness the planned Emergency Drill.

#### B. Exit Interview

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An Exit Management Interview was conducted on-site at the conclusion of the inspection on November 13, 1975, with the following attendees.

#### Jersey Central Power and Light Company

Mr. J. T. Carroll, Jr., Oyster Creek Superintendent Mr. R. M. Dube, Quality Assurance Supervisor Mr. K. O. Fickeissen, Jr., Technical Supervisor Mr. D. L. Reeves, Jr., Chief Engineer
Mr. D. A. Ross, Manager-Nuclear Generating Stations
Mr. E. D. Scalsky, Radiation Protection Supervisor
Mr. J. L. Sullivan, Jr., Operations Engineer
Mr. R. F. Swift, Maintenance Engineer

United States Nuclear Regulatory Commission, Region I

Mr. W. A. Ruhlman, Reactor Inspector Mr. J. P. Stohr, Section Leader

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The following summarizes the areas discussed:

Emergency Training Exercise. (Detail 2)
 Pre-drill Inspection Items. (Detail 3)

#### DETAILS

#### 1. Persons Contacted

### Jersey Central Power and Light Company

\*Mr. R. A. Aldinger, Quality Assurance Consultant \*Mr. J. E. Behm, Quality Assurance Specialist Mr. J. T. Carroll, Jr., Oyster Creek Superintendent Drummond, Quality Assurance Specialist \*Mr. L. \*Mr. R. M. Dube, Quality Assurance Supervisor \*Mr. W. L. Fauth, Quality Assurance Consultant Mr. K. O. Fickeissen, Jr., Technical Supervisor \*Mr. J. H. Fuller, Quality Assurance Specialist Genna, Equipment Operator Mr. T. \*Mr. J. M. Harty, Quality Assurance Consultant Mr. D. E. Kaulback, Radiation Protection Foreman \*Mr. K. D. Kirby, Quality Assurance Consultant Mr. J. U. Kozlowski, Associate Engineer MacFarland, Control Room Operator "B" Mr. D. Mr. J. P. Maloney, Operations Supervisor Manion, Equipment Operator Mr. M. Mr. B. S. Mays, Operating Foreman McKeon, Shift Foreman Mr. R. Mr. D. L. Reeves, Jr., Chief Engineer Mr. D. A. Ross, Manager-Nuclear Generating Stations Mr. E. D. Scalsky, Radiation Protection Supervisor Mr. E. J. Sherratt, Regional Director - Public Information \*Mr. W. E. Shirley, Quality Assurance Specialist Silver, Control Room Operator Mr. C. Simmons, Equipment Operator Mr. R. \*Mr. J. L. Sullivan, Jr., Operations Engineer Mr. R. F. Swift, Maintenance Engineer Weibrecht, Equipment Operator Mr. E.

State of New Jersey, Department of Environmental Protection

\*Mr. E. J. Fisher, Radiation Physicist \*Mr. D. E. McCurdy, Research Scientist

\*Observers during Emergency Training Exercise

#### 2. Emergency Training Exercise

The licensee conducted an emergency training exercise, a simulated rupture of the Isolation Condenser steam line outside the Drywell, on November 13, 1975. This exercise was observed by two (2) NRC representatives, two (2) representatives from the State of New Jersey, and ten (10) observers from the licensee's Quality Assurance and Operating Department. The scenario was centered around the steam leak with a failure of the Reactor Building Ventilation System to trip and involved two (2) injured personnel. Other than a designated lobby guard who remained for security reasons, all other personnel participated if they were not predesignated as observers.

#### a. Off-site Participation

During the course of the drill, all the required agencies were notified as required by the licensee's procedures. However, in addition to communications checks, the agencies listed below participated as indicated:

- United States Nuclear Regulatory Commission, Region I sent two observers to inspect the conduct of the drill;
- (2) State of New Jersey, Department of Environmental Protection - sent two observers to evaluate the drill and fielded two mobile monitoring teams which responded to the area of the plant and conducted simulated surveys;
- (3) State of New Jersey, State Police set up two simulated road blocks and conducted communication linkup checks;
- (4) Radiation Management Corporation (licensee's Medical Consultant) - responded to the more seriously (simulated) exposed individual by dispatching a helicopter to the site which actually loaded and became airborne with the simulated victim.

The inspectors identified no inadequacies in this area.

b. Critique

The licensee's observers conducted a critique following the drill which was attended by two (2) NRC inspectors, the licensee's observers, and the licensee's management personnel

and some drill participants. Problems were identified, and documented in draft form, in the following general areas:

- (1) availability and use of equipment for reentry teams;
- (2) communications;
- procedures and use of procedures;
- (4) rapid accountability, congestion, flow of personnel at the ECC;
- (5) off-site monitoring team activities;
- (6) assignment of responsibility (tag board system);
- (7) reporting/recording of information; and
- (8) equipment usage/availability/operability problems.

A total of fifty-seven (57) specific and general items were identified by the licensee. While the NRC observers provided additional information, the licensee's observers identified all NRC observed items in their essential elements.

The licensee also had the exercise events recorded on videotape for later evaluation and training. The Quality Assurance observations will be documented and issued, according to the licensee, in Quality Assurance Emergency Drill Audit, Number 75-C1. These areas, when documented, will be evaluated by appropriate levels of management and be resolved as necessary according to the licensee. The inspectors stated that these actions/areas would be reviewed during subsequent NRC inspections.

#### 3. Pre-Drill Inspection Items

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Before observing the drill, the inspectors reviewed the items previously identified in the Emergency Planning Inspection conducted August 4 and 5, 1975. The inspectors also reviewed the Plan with respect to updating/revision and selected equipment inventories based on a previous problem identified by the licensee. The results are summarized below.

a. Report 50-219/75-20

This report identified two (2) Unresolved Items, three (3) Open Items, one (1) item for review when completed, and one (1) design change nearing completion. These seven (7) items, in the order stated above, were reinspected with current status, prefaced with the Detail designation from the referenced report, as indicated below.

- (1) Detail 3 Lack of written agreement with off-site ambulance service - based on additional information obtained during this inspection, this item is now an Item of Noncompliance. (See Detail 3.b(1) below). The day following the inspection the appropriate letter of agreement was obtained based on a facsimile copy transmitted to Region I by the licensee on November 17, 1975. No additional response is required for this item.
- (2) Detail 3 Lack of written agreement with off-site firefighting service - this item was reinspected but remains an Unresolved Item.
- (3) Detail 14 Construction of a facility plot plan to aid in recording/evaluating on-site radiological problems during an accident or unplanned release. The licensee had constructed a plot plan and this plan was utilized during the Emergency Training Exercise conducted on November 13, 1975. This item is resolved (closed).
- (4) Detail 16 Lack of a preplanned method/procedure for pickup/evaluation of samples taken by installed environmental station following a postulated release. Although still Open at the conclusion of this inspection, the licensee stated that appropriate procedural changes would be incorporated by mid-December, 1975.
- (5) Detail 17 Lack of calculated on-site dose rates as a result of postulated accidents. The licensee indicated that based on the time required to review, evaluate and calculate dose rates for all postulated accidents, the process could not be completed, documented and distributed for use until June 30, 1976. This item remains Open.
- (6) Detail 7 The licensee's Emergency Training had not been completed by the end (August 5, 1975) of the previous inspection. This training had been completed, according to the licensee's documentation, prior to the start

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(November 12, 1975) of this inspection. The inspectors had no further questions on this item.

(7) Detail 5 - Placing upgraded meteorological equipment in service. The new equipment was placed in service October 12, 1975, and was utilized during the emergency training exercise conducted November 13, 1975. The inspectors had no further questions on this item.

The status for each item at the conclusion of the inspection is as indicated above.

b. Current Items

During the pre-drill review of the licensee's Emergency Plan and selected equipment inventories/inventory procedures, the results summarized below were obtained.

(1) Section V.D of the Oyster Creek Emergency Plan submitted on February 22, 1974 as Supplement No. 6 to the Application for a Full Term License states, in part: "Arrangements for ambulance service have been made and confirmed in writing".

10 CFR 50, Appendix E, Item IV.D requires in part that emergency plans contain "...agreements reached with local ...agencies...for other protective measures should such... protective measures become necessary or desireable." Item IV.F.5 requires: "Arrangements for transportation of injured or contaminated individuals to treatment facilities outside the site boundary."

Contrary to the above, the licensee had no written agreement for ambulance service. This lack of a written agreement is a Deficiency level Item of Noncompliance.

The licensee transmitted a facsimile copy of a letter of agreement from a local ambulance pervice which was dated November 14, 1975; the day following the completion of the inspection. Since the corrective action has been completed and verified prior to the issuance of this report, no additional response is required for this item. (2) Sections VI.A and VI.D of the Oyster Creek Emergency Plan require in part: "...periodic review (annually or more frequently, as required) of the Emergency Plan...Revisions will be submitted to the Plant Operations Review Committee (PORC) for review and approval."

10 CFR 50, Appendix E, Item IV.E.2 requires, in part, "...maintaining up to date...2. the procedures for use in emergencies..."

Contrary to the above, while the Emergency Plan was accepted by the NRC on September 23, 1974, no reviews/revisions had been submitted to the PORC for review and approval as of November 13, 1975.

This failure to conduct the required annual review constitutes a Deficiency level Item of Noncompliance.

(3) Section VI.D of the Emergency Plan requires quarterly checks of Emergency Supplies.

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Procedure 905.25, "Emergency Equipment Inventory Inspection and Calibration", Revision 0 dated May 9, 1975, states in Item 3.3: "Inventory of station health physics emergency equipment and supplies shall be performed twice a year."

A review of the licensee's records indicated that, during the last six (6) months, inventories had been made quarterly. One inventory procedure had a pen-and-ink change on Item 3.3 indicating the quarterly requirement.

The licensee stated that Procedure 905.25 would be revised to reflect the quarterly requirement and that this revision would be accomplished by mid-December 1975.

This is an Unresolved Item pending completion of the licensee's commitment.