

Docket No. 50-346

License No. NPF-3

Serial No. 1-473

October 31, 1984



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Vice President
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Mr. James G. Keppler, Regional Administrator
United States Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your August 27, 1984 Inspection Report No. 84-14 (Log No. 1-1023), for the routine inspection of emergency preparedness, including the annual radiological emergency exercise at the Davis-Besse Nuclear Power Station, Unit 1.

Following receipt of the inspection report, Toledo Edison emergency preparedness personnel met on October 11, 1984, with Messrs. J. Patterson and M. Phillips, at your Regional offices, for discussion and clarification of issues in the report. The enclosed responses are provided based upon these discussions and clarifications.

Responses to specific identified weaknesses are provided in the attachment to this letter. Two general items mentioned in your letter, however, are discussed directly. The first item identifies what you consider poor performance during this year's annual exercise. We consider this comment to be partially the result of our efforts to take advantage of this year's limited participation ("utility only") exercise.

This is the first such annual exercise since 1980 and will be the last for several years. Given this condition, Toledo Edison made a conscious decision to exercise a number of alternate personnel throughout key emergency response positions. In general, these persons were placed in alternate positions to be able to observe and critique their performance under pressure, which was in this case provided by the fact that this was an externally graded exercise.

This opportunity is unavailable in normal training situations and actual emergency conditions where we rarely have significant key personnel absences. The benefit of this lies in the opportunity to provide evaluation and improvement of our training program for alternate positions. Again, this opportunity was uniquely available this year.

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The second item relates to the comments that the emergency preparedness program has been faltering as previously alleged in your March 23, 1984 letter (Log No. 1-936). When discussed in our October 11, 1984 meeting, although no specific criteria were related to this determination, your staff's comments focused on exercise performance, "responsiveness", and inspection findings. Exercise performance is responded to in the attachment.

The few issues mentioned in the area of responsiveness tended to relate to supportive programs like the Integrated Living Schedule and Quality Assurance Programs. Problems in these areas of inter-program coordination and interface are items being evaluated under the Toledo Edison Performance Enhancement Program, as identified in our response to your March 23, 1984 letter.

The remaining area deals with inspection results. Over the past several months Toledo Edison has been reviewing NRC inspection results since 1980. The intent of this review is to more specifically identify any trends of concern in the emergency planning area.

The results are difficult to correlate due to the significant change in NRC inspection format, techniques, and acceptance criteria, in the emergency preparedness area over these years. A first cut statistical review does not show significant trends in any particular areas.

A more detailed review is still underway, however, Toledo Edison feels that efforts resulting from its activities discussed in this response and further implementation of the Performance Enhancement Program will result in the improvement desired by your staff as well as Toledo Edison.

The attachment is separated by exercise weaknesses. NRC recommendations, where provided, are also listed. Each weakness has a Toledo Edison response. If there are any questions on the attached response, please contact us.

Very truly yours,

R P Crouse

RPC:JH:nlf

cc: DB-1 NRC Resident Inspector
Marvin S. Fertel

RESPONSE TO NRC INSPECTION REPORT 84-14

Toledo Edison herein offers the following information on the identified exercise weaknesses:

1. Exercise Weakness: 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)

NRC Recommended Action:
(Section 5.a)

The licensee should make a more concerted effort to provide the NRC Region III with a complete exercise scenario package following the guidelines of FEMA Guidance Memorandum No. 17 which was incorporated in a January 12, 1982, letter from James G. Keppler, Regional Administrator, to Toledo Edison.

In addition, scenario development and review should include at least one individual skilled in plant operations, preferably an SRO. (346/84-14-01)

Response: The final scenario package was submitted within the required 20 days prior to the July 31, 1984 exercise. The detail of the submittal made by Toledo Edison was consistent with the detail of previously acceptable packages provided under the guidance of the January 12, 1982 letter issued by James Keppler. We believe the scenario package met the requirements of this letter, however, in some cases where plant data sheets were not provided, Toledo Edison failed to identify to the NRC reviewers that missing data was on a linear progression, which would have facilitated the NRC's technical review. Although the 20-day package did contain technical errors, these were corrected in time for telephone discussions with the NRC Emergency Preparedness staff on July 17, 1984, or were identified during that discussion and did not appear in the final observer package issued to the NRC upon their arrival at Davis-Besse on July 30, 1984.

It is our understanding that Region III has decided to revise its January 12, 1982 guidance to emergency preparedness personnel on submittal dates for exercise scenario packages, which should alleviate problems identified in this interaction between the NRC's technical review staff and Toledo Edison personnel.

Toledo Edison will, however, strive to provide for more timely in-house review of the scenario package prior to the submittals to the NRC.

To specifically respond to the recommendation concerning the Toledo Edison scenario review committee, this committee did contain one Senior Reactor Operator (SRO) on a full time basis and two SRO's on a part-time basis.

2. Exercise Weakness: Activation of the Technical Support Center, Radiation (sic) 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 facilities were officially activated personnel were not functioning in their assigned positions.
(346/84-14-02) (Section 5.c, 5.e, and 5.h)

NRC Recommended Action:

(Section 5.c) TSC activation procedures should clearly indicate how personnel are assigned to their initial positions and tasks so that activation will occur smoothly. (346/84-14-02)

(Section 5.e) ECC activation procedures should be modified to include some type of system such as a tag board for assignments that will clearly indicate how personnel are assigned to their initial positions and tasks, and specify the minimum positions which must be filled so that activation will occur in an efficient and timely manner.
(346/84-14-02)

(Section 5.h) RTL and RMT activation procedures should be developed to include some type of system, such as a tag board for assignments, that will clearly indicate how personnel are assigned to their initial positions and tasks.
(346/84-14-02)

Response:

TSC: The Technical Support Center was activated within 26 minutes of the ALERT declaration. The TSC activation procedure identified required personnel assignments, and the TSC task assignment board was used. However,

a number of our Nuclear Facility Engineering personnel were assigned by their supervisors to report to the TSC as part of a pool of additional engineering resources. Additionally, several engineers were located in the TSC to observe for training. Because they were not issued observer badges, nor was there an identified location for "pool resource personnel", these engineers would have seemed to be unsure of their TSC position or responsibilities. The Emergency Planning Group will more adequately identify non-essential TSC personnel during exercises and designate such personnel with appropriate badging so as to easily identify those not assigned as TSC staff.

ECC: The ECC activation procedure identified personnel necessary to implement timely and organized activation of this emergency response facility. Additionally, the procedure provided a step-by-step checklist of the actions to be taken by the Emergency Duty Officer (EDO). During this exercise, Toledo Edison management emergency response personnel did identify EDO organizational problems and his failure to use available procedures. Toledo Edison considers the emergency exercise a major segment of the annual training program of emergency response personnel. Because of this, it was determined that the EDO would be allowed to remain in his position to encourage improved performance once activation was accomplished. This decision contributed to the observation of the weakness. Toledo Edison has reviewed the EDO list in Administrative Memo No. 41 and is revising the personnel identified and trained for that position. Additionally, Toledo Edison will increase the emphasis on the use of the ECC activation procedure and checklist during EDO training. Also, a revised ECC activation procedure submitted for Station Review Board concurrence on October 24, 1984, more adequately addresses the minimum required staffing for activation of the ECC.

RTL & RMT: Following the 1983 annual emergency exercise, Toledo Edison implemented an NRC recommendation to add a position of Radiological Testing Laboratory Coordinator to facilitate the activation of the RTL and Radiation Monitoring Teams (RMT's). Therefore, during the July 31, 1984 exercise, the positions were actually being graded for the first time. Additionally, to provide the most experienced monitoring response in the field,

the initially assigned pairing of personnel for Radiation Monitoring Teams was changed prior to their move to the field. This personnel switch between the teams created what appeared to be confusion in the checkout of team equipment, but in actuality was an effort by the two Chemistry & Health Physics (C&HP) team members to ensure each team had a full RMT kit.

Toledo Edison is revising the RTL activation procedure to more clearly specify the delineation of duties among the RMT and RTL coordinators.

3. Exercise Weakness: 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)

NRC Recommended Actions:

(Section 5.c)

TSC and Control Room communications need to be sufficiently coordinated to ensure that each group is aware of plant status and the status of actions to mitigate the consequences of the event (e.g., TSC is aware of Control Room valve lineup changes, etc.). (346/84-14-03)

Response:

During our critique of the July 31, 1984 emergency exercise, Toledo Edison TSC management personnel identified that communications between the TSC and Control Room needed some improvement, particularly in the area of technical information transmitted and management discussion. TSC and Control Room personnel are working with the Emergency Planning Group on a method to increase and improve the communication between these two critical emergency response facilities.

An improved methodology will be developed and incorporated into the training for Control Room and TSC personnel in late 1984 and 1985. It is expected, however, that this methodology may be revised again based on its adequacy as shown in the 1985 annual exercise.

This communication coordination, however, was not the reason for halting TSC participation in the July 31, 1984 exercise. The TSC was asked to halt its activity toward cooldown and de-escalation, due to the failure

of the ECC to declare a General Emergency as scheduled in the scenario. The exercise controllers decided to have the ECC go to the General Emergency to allow them to test the EDO and requisite protective actions identified in the ECC and General Emergency procedures and checklists.

4. Exercise Weakness: 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 radio-nuclide composition of the release. Neither facility maintained a record involving the total material released. (346/84-14-04) (Section 5.3 and 5.e)

NRC Recommended Actions:

(Section 5.c) All critical plant data, including that which must be calculated such as primary to secondary leak rate, should be trended during an event to evaluate whether conditions are degrading or off-site releases are increasing. (346/84-14-04)

(Section 5.e) Critical data affecting offsite protective action recommendations, such as release rate and radio-nuclide composition, should be plotted during an event so that evaluations involving total material released and potential offsite dose can be made. (346/84-14-04)

Response: The Data Acquisition and Display System (DADS) does provide trending of critical instrumented plant parameters and this data is available in the computerized DADS historical files. To more specifically guide the staff, EI 1300.08 has been revised to identify the need for trending of data and allow for calculation of total population exposure.

5. Exercise Weakness: No inplant radiation monitoring data was supplied to the Operational (sic) Support Center, while some team members 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)

NRC Recommended Action:

Procedures should be developed to ensure that all teams dispatched into the plant during an emergency are accompanied by a C&RT person and are provided with a detailed briefing on a maximum dose allowable for the task, anticipated dose rates, and appropriate ALARA considerations such as routes to follow to minimize dose. (346/84-14-05)

Response:

The Davis-Besse Operations Support Center (OSC) is divided into several distinct areas including the Fifth Floor Conference Room where the OSC Manager is located, the Turbine Deck where Repair Teams assemble, and the Health Physics Monitoring Room, where Chemistry & Health Physics (C&HP) personnel assemble. With this format, the OSC Manager communicates with the Health Physics Monitoring Room on the required repair needs and locations and with the Turbine Deck for Repair Team members. The Repair Teams are dispatched from the Turbine Deck and Chemistry & Radiation Testers (C&RT's) from the Health Physics Monitoring Room. The C&RT's have available all ALARA information and meet the Repair Teams at a pre-determined location based on known in-plant radiological data. Upon meeting with the Repair Teams, the C&RT's provide all ALARA information and then identify the route to be taken to the repair location, based on ALARA considerations. This procedure was followed and observed by the Operations Support Center.

6. Exercise Weakness: 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)

NRC Recommended Action:

The EDO's procedure for Site Area or General Emergency should clearly indicate that a determination of nonessential personnel will be made after accountability is completed and further indicate that these personnel will then be evacuated unless radiological or environmental conditions prohibit an evacuation.
(346/84-14-06)

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Response: EI 1300.08 does identify that the EDO will consider non-essential personnel and their subsequent evacuation. Because the EDO failed to use the ECC procedures, this item was not addressed. Emphasis will be placed on the use of procedures during the EDO training.

Toledo Edison herein offers the following information on the identified comments during the exit interview.

Statement: Your inspection report states that the most recent revision to the Davis-Besse Emergency Plan had deleted a description of the public information program as this had been included in the recently issued Public Information Plan for emergencies. Since this area is required to be included in the Emergency Plan to meet 10 CFR 50.47(b)(7) requirements, the licensee agreed to submit three controlled copies of this public information plan to Region III and two copies to NRC Headquarters to comply with 10 CFR 50.54 (q) requirements.

Response: Sections 5.3, 7.1.2.6, 7.4, and 8.2 have not been deleted from the Davis-Besse Emergency Plan and still provide the description of the public information program per 10 CFR 50.47(b)(7). In May, 1984, Toledo Edison issued the Corporate Radiological Emergency Response, which provides the plan for the activation of the Corporate organization to support the needs of Davis-Besse in the event of an emergency requiring activation of the Davis-Besse Emergency Plan. Included as a part of this Plan is the Public Information Implementing Procedures, which replaces a document, "Public Information Policies and Procedures", previously issued by the Public Relations Department.

Under separate cover two controlled copies have been sent to NRC Headquarters (Serial No. 1088) and one to you (Serial No. 1-467), per 10 CFR 50.54(q). Additionally, two extra controlled copies were sent to you per the verbal request of your emergency preparedness staff.

JH:nlf