

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-373/85-02(DRSS); 50-374/85-02(DRSS)

Docket Nos. 50-373; 50-374

Licenses No. NPF-11; NPF-18

Licensee: Commonwealth Edison Company
Post Office 767
Chicago, IL 60690

Facility Name: LaSalle County Nuclear Generating Station, Units 1 and 2

Inspection At: LaSalle Site, Seneca, IL

Inspection Conducted: January 21-28, 1985

Inspector: *T. Ploski*
T. Ploski
Team Leader

2/14/85
Date

W. Snell
W. Snell

2/14/85
Date

for *T. Ploski*
G. Brown

2/14/85
Date

Approved By: *M. P. Phillips*
M. P. Phillips, Chief
Emergency Preparedness Section

2/14/85
Date

Inspection Summary

Inspection on January 21-28, 1985 (Reports No. 50-373/85-02(DRSS); 50-374/85-02(DRSS))

Areas Inspected: Routine, unannounced inspection of the following areas of the emergency preparedness program: licensee actions on previously-identified items; activation of the emergency plan; 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 maintaining emergency preparedness. The inspection involved 135 inspector-hours onsite by three NRC inspectors and one consultant.

Results: No items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

*G. Diederich, Station Superintendent
*R. Bishop, Assistant Superintendent for Administration
*K. Klotz, GSEP Coordinator
T. Blackmon, Lead GSEP Coordinator, South Team
M. Jeisy, Quality Assurance Supervisor
J. Ahlman, Quality Assurance Engineer
R. Crawford, Training Supervisor
H. Barch, Training Instructor
S. Majerchem, Central Files Supervisor
A. Norris, Word Processing Supervisor
A. Scaccia, Offsite Emergency Planner
T. Borzym, Station Security Administrator
D. Hamilton, Assistant Security Administrator
M. Dowd, Central Files
T. Hammerich, Technical Director
R. Manning, Technical Director
R. Raguse, Operations Director
H. Hentschel, Shift Engineer
H. McLain, Shift Engineer
J. Sketterly, Shift Engineer
W. Sly, Shift Engineer
J. Lockwood, Station Control Room Engineer
W. Kirchoff, Station Control Room Engineer
E. O'Connell, Station Control Room Engineer
D. Pristave, Station Control Room Engineer
D. Hieggelke, ALARA Coordinator
G. Cooper, Master Instrument Mechanic
H. Mulderink, Master Electrician

*Indicates those present at the January 28, 1985 exit interview.

2. Licensee Actions on Previously-Identified Items

(Closed) Open Item 373/83-36-01 and 374/83-35-01: "Delete all references to the interim EOF and describe the Mazon EOF in the next revision to the LaSalle Annex." The inspector reviewed Revision 3 to the Annex, dated October 1984 and the current revision to the Generating Station Emergency Plan (GSEP) telephone directory. Both documents referred to Mazon as the only EOF facility. This item is considered closed.

(Closed) Open Item 373/84-12-01: "Severity Level 4 Violation - During the period April 1983 through April 1984 the licensee failed to demonstrate the capability to initially notify state authorities within 15 minutes of emergency declaration." The inspector determined that during mid-1984 the licensee modified the Nuclear Accident Reporting System (NARS) so that appropriate state agencies and its load dispatcher could be simultaneously called following any emergency declaration. This

modification significantly simplified their notification process. Timely and adequate initial notifications were demonstrated in record reviews of actual GSEP activations during the period May 1984 through January 21, 1985. This item is considered closed.

(Closed) Open Item 373/84-18-02 and 374/84-24-02: "Paragraph F.1 of LZF 1310-1 contained incorrect and misleading guidance regarding how emergency declaration time is defined and elapsed time for accomplishing offsite notifications is measured." The inspector reviewed Revision 9 to this procedure, dated December 1984, and determined that it had been adequately modified. The item is considered closed.

(Open) Open Item 373/84-18-01 and 374/84-24-01: "There was a lack of procedural guidance regarding the formulation and documentation of adequately detailed followup messages to offsite authorities, per the guidance in NUREG 0654, Revision 1, and Section 6.1 of the GSEP." While instructions were added to Revision 9 of LZF 1110-1 (December 1984) to address this concern, discussions with Training Department personnel and walkthroughs with four SEs and four SCREs indicated that the procedure modification was not effective. Most participants were unaware of the procedure revision and how to implement it. Pending creation and implementation of a standardized followup message form, this item will remain open.

(Open) Open Item 373/84-18-03 and 374/84-24-03: "During the 1984 exercise the licensee failed to meet the exercise objective of demonstrating post-accident sample collection and analysis capabilities utilizing the High Range Sampling System (HRSS)." While it was determined by the inspectors that both Units' HRSS were fully operational, closing this item will be dependent on actual observation of sample collection and analysis capabilities during a future inspection.

(Open) Open Item 373/84-18-05 and 374/84-24-05: "Personnel assigned to the dedicated GSEP van exhibited unfamiliarity with the operation of some of its equipment. Replacement TLDs were not available to the offsite monitoring team utilizing this vehicle during the 1984 exercise." The inspectors determined that replacement environmental TLDs had now been added to the van's equipment. Per Action Item Reports 01-84-31805 and 01-84-42405, additional training of appropriate Radiation Chemistry Technicians (RCT) on the use of the GSEP van was scheduled following the 1985 Spring refueling outage. This training should include hand-on familiarization training with the van. This item remains open pending completion of this training.

3. Emergency Plan Activations

(Closed) Open Item Nos. 373/84-XX-01, -02, -03, 374/84-XX-01, 374/84-XX-02, and 374/84-08-XX: Activations of the Generation Station Emergency Plan (GSEP). The inspector reviewed records relating to the activation of the GSEP during the period May 1, 1984 through January 24, 1985. The GSEP was activated on eight occasions during this period. Two of these occasions involved emergency reclassifications prior to event terminations. The review included the following documents and contacts:

- a. Shift Engineer's (SE) Logs
- b. Copies of NARS forms
- c. Records generated in the Technical Support Center (TSC) when it was activated.
- d. Illinois Emergency Services and Disaster Agency (IESDA)

The following table summarizes chronological notification information for the LaSalle Station GSEP activations:

GSEP ACTIVATIONS
MAY 1984 - JANUARY 1985

<u>Date</u>	<u>Class</u>	<u>Time Occurred</u>	<u>Time Declared</u>	<u>IESDA Notifiedα</u>	<u>Elapsedβ Time (minutes)</u>
6/15/84	UE	0215	1715	1727	12
8/18/84	UE	0430	0430	0441	11
9/6/84	UE	0830	0925	0946	21
9/30/84	Alert	0130	0730	0736	6
9/30/84 ψ	UE	1336	1336	1336	0
11/20/84	UE	1330	1400	1405	5
11/20/84 ψ	Alert	1710	1740	1745	5
1/14/85	Alert	1430	1530	1532	2
1/14/85	Alert	1930	2030	2035	5
1/21/85	UE	2020	2320	2320	0

α Times listed are the later of the times available from IESDA and the licensee.

β Elapsed time from declaration to IESDA notification.

ψ Change in emergency classification.

As indicated in the table, the licensee successfully demonstrated the capability to initially notify state authorities within fifteen minutes after emergency declaration. The NARS telephone system had been modified since the last inspection to give the licensee the capability to contact appropriate state authorities and the load dispatcher simultaneously. This modification has simplified the method of initial notification and accelerated offsite notification times.

The table also indicates a large variability in the elapsed times between emergency event occurrences and related emergency declaration times. Examination of SE log entries associated with such GSEP activations indicated that events where elapsed times from occurrence to declaration exceeded about fifteen minutes involved emergency declarations resulting from Technical Specification required shutdown as a result of entering the action statement for a Limiting Condition for Operation (LCO). On these occasions, when the point in time was reached when personnel determined that the equipment problem could not be corrected before the LCO time limit would expire, the emergency declaration was then made; however,

all notification forms were filled out with the time the LCO was identified as the event time rather than the time when personnel determined that the problem could not be fixed within the LCO time limit. Since the emergency declaration should be based on the inability to fix the equipment or problem within the LCO time limit, the time of the event should be recorded as the time when the reactor must be shutdown and not the time when the LCO is initially entered.

The SE log entries indicated that the NRC was timely notified of each event classification and termination; however, the log and the NARS forms did not always provide adequate documentation of information provided to state authorities. For example, the NARS forms associated with the June and August 1984 Unusual Events (UE) did not specify the times the State authorities were initially notified while the SE Log provided only approximate notification times. The latter UE's NARS forms did not contain the termination times or the persons contacted. The inspectors could not locate a NARS form associated with the termination of the June event.

The inspectors reviewed records generated in the TSC during its activations following Alert declarations. Compiled records were maintained in the station's Central Files. The following documents were included in the review:

- a. "Actual GSEP Events Evaluating Checklist"
- b. Records generated by individual directors
- c. Internal TSC message forms and records
- d. Records generated in the Control Room.

The inspectors determined that there were sufficient records to document the licensee's responses. The TSC records were also evaluated to determine the speed with which the TSC had become fully operational following each Alert. Only three of the four alerts remained in effect long enough to staff the TSC. On these three occasions the TSC had been declared fully operational with responsibilities transferred from the interim Station Director within 60 to 75 minutes after declaration.

Based on the above findings, this portion of the licensee's program is acceptable. However, the following item should be considered for improvement:

- . The GSEP Coordinator should review 1984 NARS forms related to Unusual Events for completeness. Appropriate SEs should be afforded additional instruction on completing the NARS form, especially as it relates to emergency event times based on exceeding LCO time limits.

4. Emergency Detection and Classification (82201)

The inspectors reviewed the Generating Station Emergency Plan (GSEP), the LaSalle Annex to the GSEP, Emergency Plan Implementing Procedures (LZP), other supporting procedures including some LaSalle General Abnormal (LGA) and LaSalle Operating Abnormal (LOA) procedures, and the Technical Specifications. Instructions for use of the Nuclear Accident Reporting

System (NARS) in the Environmental Director's Emergency Plan Implementing Procedures ED.17 were also reviewed. Also, walkthroughs were conducted with four Shift Engineers (SEs) and four Station Control Room Engineer (SCREs) to determine their abilities to respond to emergency conditions.

The procedure reviews indicated that all procedures met the standards of 10 CFR 50.47(b)(4) and the requirements of 10 CFR 50 Appendix E Section B. During reviews the following were noted:

- a. Legibility quality of some pages in the LZP binders found in the Control Room was poor. Examples included: LZP 1110-1, Rev. 9, page 16 and LZP 1210-1, Rev. 4, page 5.
- b. Some inconsistencies between EALs listed in LZP 1200-1 and LZP 1310-1 were noted as follows:

<u>EAL</u>	<u>Classification</u>	<u>LZP 1200-1</u>	<u>LZP 1310-1</u>
3	Unusual Event	<0.02g	<0.01g
10	Alert/Site Emergency	25ppm (ammonia)	50ppm (ammonia)
15	Alert/Site Emergency	all values absolute	all values">"

Walkthroughs with the SEs and SCREs indicated that both groups had the ability to properly detect and classify emergencies. It was clear to all individuals, however, that the SE had the ultimate responsibility for declaring an emergency.

During the walkthroughs most participants showed a lack of familiarity with use of the NARS form. This was demonstrated by their individual comments and actions while filling out the form during the walkthroughs, as well as by incomplete or improper entries on several NARS forms completed during actual GSEP events, as discussed in Paragraph 3.

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

- . The licensee should either list EALs in only one LZP series procedure or should eliminate all discrepancies between the EALs listed in both LZP 1200-1 and 1310-1.

5. Protective Action Decisionmaking (82202)

As Acting Station Director (SD), the SE has been given the authority and responsibility for issuing offsite protective action recommendations until properly relieved by a SD functioning in the Technical Support Center (TSC). All SEs and SCREs interviewed during this inspection were aware of the requirement to issue an offsite recommendation within about 15 minutes following any General Emergency declaration and were aware of the minimum recommendation to be provided. All SEs demonstrated the capability to formulate and document an acceptable recommendation,

utilizing procedure LZP 1200-5, GSEP Guidelines for Recommended Offsite Protective Actions, Revision 1. This procedural guidance was adequate and identical to that in the current GSEP revision.

However, while oversized copies of decisionmaking guidance were provided in GSEP Table 6.3-1 and Figure 6.3-1, standard-sized copies of the guidance were reproduced in LZP 1200-5. During walkthroughs, several SEs exhibited some difficulty in reading the reproduced table and figure contained in the procedure. The inspectors noted that oversized copies of the table and figure had been posted in the TSC.

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

- . Procedure LZP 1200-5 should include more legible copies of protective action decisionmaking guidance as found in GSEP Table 6.3-1 and Figure 6.3-1.

6. Notifications and Communications (82203)

The licensee's provisions for notifying appropriate offsite organizations of emergency plan activations at the LaSalle Station have been described in Section 6.0 of the GSEP, the LaSalle Annex, and in procedures LZP 1110-1 and 1310-1. Notifications have been accomplished using the NARS system which links the Control Room, Technical Support Center (TSC), and Emergency Operations Facility (EOF), with the Illinois Emergency Services and Disaster Agency and Illinois Department of Nuclear Safety. In the event of a General Emergency, the NARS can also be used to directly reach county officials. Should NARS become inoperable, backup commercial telephone numbers for normal and off-hours have been provided for government agencies in the GSEP Telephone Directory, LZP 1310-1, and LZP 1700-1. The inspectors determined that the NARS and other dedicated communications equipment had been installed in the onsite emergency response facilities and the EOF as described in the GSEP and LaSalle Annex. Adequate copies of the NARS Form used to document initial notifications to State agencies were readily available in the Control Room, TSC, and EOF. The inspector reviewed monthly, quarterly, and annual communications drill records for 1984 and determined that all required communications tests had been conducted and adequately documented.

The licensee's prompt notification (siren) system has been described in the LaSalle Annex. Monthly system tests, preventive and emergency maintenance provisions were unchanged from those described in Inspection Report 50-373/84-12 and 50-374/84-16. The inspector reviewed records of semiannual preventive maintenance tests and work done on each siren during September and October, 1984. These records were complete and adequately detailed.

Based on the above findings, this portion of the licensee's program is acceptable.

7. Changes to the Emergency Preparedness Program (82204)

The licensee's provisions for creating, revising, and distributing Emergency Plan Implementing Procedures (EPIP) remained adequate and unchanged from those described in the following NRC Inspection Reports: 50-373/83-36 and 50-374/83-25; 50-373/84-12 and 50-374/84-16. The inspectors reviewed the procedures revised since the last routine inspection and determined that none of these revisions decreased the effectiveness of the procedure.

Since the last routine inspection, the licensee has issued revisions to its GSEP and the LaSalle Annex to the GSEP. By correspondence dated May and October 1984, the licensee submitted Revisions 4 and 4A, respectively. NRC approval of both revisions was documented by a letter dated December 4, 1984. By correspondence dated October 1984, Revision 3 to the LaSalle Annex was submitted to the NRC. Approval of this revision was documented by a letter dated December 7, 1984. Both letters were from Dr. C. J. Paperiello, NRC, to Mr. Cordell Reed, Vice-President, Commonwealth Edison Company. The inspectors determined that changes to the GSEP and LaSalle Annex had been incorporated in revisions to appropriate Emergency Plan Implementing Procedures.

In its approval of the GSEP and LaSalle Annex, the NRC indicated that all changes were consistent with the requirements of 10 CFR 50.54(q) and did not decrease the effectiveness of the GSEP and Annex. However, the following improvement items should be considered for incorporation into the next revision to the GSEP and/or LaSalle Annex, as indicated:

- a. In the next GSEP revision, the licensee should include a definition for the word "annual." This definition should be consistent with that found in the Technical Specifications.
- b. Section 4 of the GSEP should clearly state which of the initial Station Director's responsibilities cannot be delegated to others, other than those authorized to relieve that individual.
- c. The GSEP should clearly indicate which individual is ultimately responsible for authorizing emergency worker exposure in excess of regulatory limits.
- d. Section 4.0 of the GSEP indicated that the Recovery Manager could delegate responsibility for approving press releases to an unspecified designee. These person(s) should be identified by position title(s).
- e. In Table 4.3-3 of the GSEP, the NRC was inappropriately referred to as being a member of an advisory support group whose efforts would be coordinated by a member of the licensee's staff. The NRC should not appear on the table.
- f. GSEP Tables 4.3-12 and 6.1-2 through 6.1-4 should be revised to reflect the station's capabilities to simultaneously notify appropriate state agencies and the licensee's load dispatcher following declaration of any emergency.

- g. GSEP Table 6.1-7 should list the NRC among organizations to be notified upon downgrading an emergency classification.
- h. GSEP Section 8.0 should indicate that representatives of appropriate offsite organizations are annually given the opportunity to review the station's Emergency Action Levels.
- i. The GSEP and LaSalle Annex should contain lists which cross-reference between these documents and the current revision to NUREG 0654.
- j. Paragraph 4.0 of the LaSalle Annex should indicate that there are nine, rather than eight, Station Group Directors.
- k. Table LA 6-1 and/or Figure LA 6-5 of the Annex should include evacuation time estimate data for both normal and adverse weather conditions that are available from the 1980 and 1981 studies.
- l. Section 8.1 of the Annex should also indicate that the station is entirely responsible for conducting off-hours augmentation drills.
- m. The licensee should develop some method, such as margin bars to indicate current changes to the Annex revision.

8. Shift Staffing and Augmentation (82205)

Licensee procedures describing the minimum shift staffing and augmentation of plant staffing were reviewed and determined to have met the goals of Table B-1 of NUREG-0654, Revision 1. The review included Section 4-2 of the GSEP, LZF 1320-1, LZF 1700-1, LZF 1700-2, and LZF 1110-1,

A review of Attachment B to LZF 1320-1 revealed that two individuals were listed to fill the Environs Director position of the Station Group. The inspector learned that one of these individuals was lost through attrition, leaving only one person on the call list for the position. It was also learned that three additional people were originally scheduled to be trained to support this position January 15-17, 1985. However, when only one of the three appeared as scheduled, the training was cancelled. The training for these three individuals had been rescheduled for March 26, 1985, leaving a substantial period of time when no backup provisions exist.

The poor judgement exercised by the licensee in failing to provide timely training to support the Environs Director position and the licensee's lack of attention in allowing this condition to persist could have resulted in confusion and loss of time during an actual GSEP event when attempting to fill the position through normal procedures. The licensee must make provisions to ensure that this position can always be filled within the 60 minute limitations imposed by LZF 1320-1. NRC concerns in the area will be tracked under Open Items 50-373/85-02-01 and 50-374/85-02-01.

To avoid future situations where only one person may be available to fill a position, the licensee should fully qualify at least three persons for each director position of the Station Group.

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

The inspector reviewed the licensee's emergency preparedness training program as addressed in GSEP Section 8.2, Training, and in procedure LZP-1520-1, Assignment of Personnel to GSEP Positions and Associated Training Requirements. The licensee's Production Training Center (PTC) had overall responsibility for ensuring that all badged station personnel receive adequate initial and annual retraining on the GSEP and station specific Annex. Training for personnel assigned to the onsite emergency organization had been conducted by the station's Training Department. Retraining to maintain proficiency in assigned GSEP director positions had been predominantly through required reading of applicable procedures and participation in drills or exercises.

Since the last routine inspection, the Training Department has also utilized Procedure Change Summary memoranda to inform affected personnel of procedure changes. These memoranda identify the revised procedures and summarize what aspects of each procedure have been changed. Training staff indicated that in 1985 classroom sessions and seminars would be utilized with greater frequency to supplement required reading to achieve emergency assignment requalification training.

Walkthroughs were conducted with a sampling of personnel in the onsite emergency organization to ascertain their understanding of their duties and responsibilities. In addition to the four SEs and four SCREs, walkthroughs were conducted with personnel assigned to the following Station group director positions: Station, Technical, Operations, Maintenance, Stores, Security, Administrative, and Rad/Chem Directors. All personnel demonstrated an adequate level of knowledge and understanding of their emergency duties. Two alternate Administrative Directors had not yet participated in that capacity in either a drill, exercise, or real emergency plan activation, although both persons had been alternates for over a year.

An examination was also made of the training of Security personnel in their role in the activation of the GSEP organization. Security personnel training consisted of annual classroom training that covered all Security procedures, including those relevant to GSEP activation, and participation in drills and exercises. This included conducting an annual assembly/accountability drill, which is an area of responsibility assigned to Security during activation of GSEP.

The inspector examined the Training Department's records for a sampling of individuals assigned to GSEP positions. In all cases the personnel were found to have completed their required training within the required annual period.

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

All personnel assigned to fill Station Group director positions should be given the opportunity to participate in drills and/or exercises on a rotating basis.

10. Licensee Audits (82210)

Two "onsite" audits of the emergency preparedness program were conducted during 1984 by Quality Assurance (QA) personnel based at the Station. Onsite Audit 01-84-20, performed from May 25 through June 1, 1984, was adequate in scope and depth of questions, and was thoroughly documented. Corrective actions on this audit's finding and observation were promptly completed and adequately documented. Onsite Audit 01-84-72, conducted in December, 1984, was a supplemental audit to determine whether certain types of specialized emergency preparedness training had been recently completed. This audit was adequately documented, with no negative findings or observations. In August, 1984, QA personnel not based at the Station performed "offsite" audit I-84 II, which addressed a number of functional areas including emergency preparedness. This audit was adequately documented, including sufficient records to demonstrate that the QA Department was tracking progress made toward resolving the only finding related to emergency preparedness. All three of the above audits were conducted by personnel independent from the emergency preparedness implementation as required by 10 CFR 50.54(t).

As indicated in Paragraphs 6 and 11 of this report, the inspectors reviewed records of 1984 emergency preparedness drills and exercises and determined that all had been conducted and critiqued in accordance with regulatory requirements and GSEP commitments. Revision 3 to LZP 1530-1, Exercises and Drills, became effective in October 1984. This procedure directed the Station's GSEP Coordinator to adequately document the decisionmaking process regarding corrective actions on improvement items identified in the licensee's drill and exercise critiques. Reference to any Action Item Records (AIRs) used to initiate and track corrective actions were to be included in this documentation. Since implementation of this procedure revision, the annual communications drill, annual environmental monitoring drill, and the exercise have taken place. Corrective actions were adequately documented for the annual communications drill. The coordinator and the inspector reviewed the December 1984 exercise critique report and agreed that fifteen "concerns worthy of followup" which were listed matched items identified in the NRC's inspection report for that exercise. The inspector verified that corrective actions on items identified by the NRC had been adequately referenced to AIRs and that satisfactory progress was being made toward completing those corrective actions. While the licensee's final critique on the late-November environmental monitoring drill was not yet available onsite, the inspector noted that Nuclear Services Technical Staff was, in general, demonstrating the capability of generating more timely final critique reports for this Station's drills and exercises than had been apparent in 1983 and early 1984.

In the Spring of 1984 Nuclear Services Technical staff issued an "Actual GSEP Events Review Checklist" to the Stations' GSEP Coordinators. The coordinators were to use this checklist as an aid in determining the adequacy of various emergency response actions. The use of this checklist had been proceduralized at the LaSalle Station in LZP 1530-1, Exercises and Drills. However, reviews of actual GSEP activations since May, 1984 reveal that the checklist had only been utilized following Alert declarations. The coordinator stated that he had been experiencing difficulty in having Unusual Event declarations reported to him. LZP 1530-1, paragraph 5.a, requires that the SE or his alternate inform the GSEP Coordinator after any emergency declaration. However, based on walkthroughs with four SEs, the inspectors concluded that none were aware of this notification requirement included in this procedure and it also was not referenced in the Station Director-Acting Station Director implementing procedure LZP1110-1. The SEs stated that, following emergency plan activations, completed NARS forms routinely were sent to the Operations Engineer through the Station's internal mailing system. Thus, the GSEP Coordinator could have been bypassed.

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

- The licensee should implement a more effective system for notifying the GSEP Coordinator of actual emergency plan activations other than that contained in Revision 3 to LZP 1530-1.

11. Maintaining Emergency Preparedness

The inspectors reviewed records of emergency preparedness drills conducted since the last routine inspection and determined that all had occurred and been critiqued in accordance with regulatory requirements and GSEP commitments. During 1984, the licensee had set goals of 30 and 60 days for issuing final critiques of drills and exercises, respectively. By comparing dates of occurrence with final critique report dates, the inspectors concluded that the licensee was making progress toward achieving these goals during the second half of 1984. The quality of the critique reports had also improved over some issued in 1983 and early 1984. The inspectors reviewed a critique report dated December, 1984, regarding semiannual Health Physics drills conducted at each of the licensee's five nuclear generating stations during the period May through early September, 1984. Each drill involved use of the stations' High Range Sampling System (HRSS) to obtain coolant and containment air samples. The combined critique report identified improvement items that were both station specific and generic in nature. The inspectors determined that LaSalle station personnel had reviewed and acted upon critique items that were site specific, while generic problems were being dealt with by the Production Training Center staff and other personnel.

The inspector reviewed records of the annual offsite support agency training session held to satisfy the regulatory requirements in 10 CFR 50.47(b)(15) and 10 CFR 50, Appendix E, Paragraph IV.F. This training was performed at the Mazon Emergency Operations Facility (EOF)

on August 16, 1984. As in 1983, one session was conducted for offsite organizations that could be called on to provide emergency assistance to the LaSalle County and Dresden Station. This session was also used as an opportunity to review the stations' Emergency Action Levels (EALs) with representatives of offsite support organizations. Documentation of this session, which included letters of invitation, an agenda, and attendees sign-in sheet, was adequate. Topics of discussion included: the GSEP; protective action options; emergency communications systems; notification requirements; the licensee's onsite and offsite emergency organizations; and the stations' EALs. The EAL presentation included descriptions of a sampling of EALs, discussion of the basis for certain EALs, and how certain EALs address loss of one or more fission product barriers. Attendees also watched a slide presentation on the Braidwood Station and a film on testing of spent fuel shipping casks. Additionally, attendees were informed of how the licensee conducts independent audits of its emergency preparedness program and how portions of audit items addressing interface with offsite authorities are made available to offsite organizations.

Based on the above findings, this portion of the licensee's program is acceptable.

12. Exit Interview

Preliminary inspection findings were presented and discussed over the telephone on January 28, 1985 with those licensee representatives denoted in Paragraph 1 of this report. The licensee agreed to consider the items discussed.