U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 50-352/85-10

Docket No. 50-352

License No. CPPR-106 Priority -- Category B-1

Licensee: Philadelphia Electric Company

2301 Market Street

Philadelphia, Pennsylvania 19101

Facility Name: Limerick Generating Station

Inspection At: Limerick, Pennsylvania

Inspection Conducted: January 25 - March 8, 1985

Inspectors: Craig Z. Gordon 6-6-85
Craig Z. Gordon date
Emergency Preparedness Specialist

Approved by: T. L. Harpster 6/10/85
T. L. Harpster, Chief date
Emergency Preparedness

Inspection Summary:

Inspection on January 25 - March 8, 1985 (Inspection Report No. 50-352/85-10)

Areas Inspected: Routine, announced follow-up inspection of items identified during the Emergency Preparedness Implementation Appraisal. The inspection involved 40 hours by two region based inspectors.

Results: No items of noncompliance or deviations were observed.

DETAILS

1. Persons Contacted

The following licensee representatives were contacted during this inspection.

Philadelphia Electric Company

M. Bassioni, Project Manager Acoustic Technology
S. Boyle, Manager of Communications
*J. Connelly, QA Engineer
*R. Dubiel, Senior Health Physicist
*C. Endriss, Regulatory Engineer
R. Hamilton, Senior Electrical Engineer
*G. Leach, Station Superintendent
M. Mezias, EP Analyst
*J. Phillibaum, Site Emergency Preparedness Coordinator
W. Rekito, Regulatory Coordinator
L. Schaumberg, Engineering Design Analyst
*V. Warren, Test Engineer
*J. Wiley, Senior Chemist

NRC

*R. Borchardt, Reactor Engineer

*Denotes those present at exit meeting on March 8, 1985.

2. Licensee Actions on Previous Inspection Findings

During the period June 11-22, 1984, the NRC conducted an appraisal of the emergency preparedness program at the Limerick Generating Station. As a result, the NRC team identified 43 significant (Category A) and 6 improvement (Category B) items requiring resolution in order for the licensee to achieve an adequate state of emergency preparedness. After the appraisal, two follow-up inspections were conducted to determine the licensee's progress in addressing each open item. The second followup inspection identified 10 significant items needing further licensee attention. The purpose of this inspection was to follow-up on those remaining items.

(Open) 84-18-01: Formally assign an onsite Emergency Preparedness Coordinator (EPC) using selection criteria equivalent to those for Supervisors in ANSI N.3.1. This individual should report to the station superintendent and be given direct working level responsibility and authority over all aspects of the development and maintenance of the LGS Emergency Preparedness Program (EPP). Revise normal organizational charts, position analysis descriptions, and other related documents to reflect the EPC assignment in addition to describing the scope of duties, authority, and reporting chain.

The inspectors reviewed documentation provided by the licensee and held discussions with licensee management. At the time of the inspeciton, the assignment of an onsite EPC, the establishment of criteria/ procedures to ensure continuity of emergency preparedness functions, and the revision of organizational charts were not implemented.

(Open) 84-18-02: Develop and identify tasks, strategies, and landmarks to implement and efficiently coordinate the onsite EPC to include as a minimum: indication of the responsibilities and authorities of the individuals involved; the extent of participation of onsite technical groups in the development and implementation of training; implementation of procedures; and the selection of equipment and supplies.

The inspectors noted that the licensee had developed project management charts to ensure an orderly and complete number of tasks needed to maintain adequate emergency preparedness, but implementation was not completed.

(Open) 84-18-03: Review the description of the emergency organization and revise it as necessary to provide for a clear depiction of all emergency functions required during initial, intermediate, and final phases of augmentation and recovery; update the site and corporate Emergency Plans to describe the revised organization; revise and issue implementing procedures which have been human engineered so that all emergency response tasks can be carried out using the command and information pathways of the organizations. The updated description of the emergency organization should include a sufficient level of detail, unambiguously delineate the command hierarchy, clearly specify its structure, reporting chains and interrelationships at any phase of augmentation, and include supervisory as wel' as non-supervisory elements.

The inspector noted that the review of the emergency organization had been neither completed nor implemented at the time of the inspection.

(Open) 84-18-07: Establish qualification criteria for each emergency response function in such a manner that a clear line of progression, from untrained to qualified, including hands-on demonstration, can be achieved.

The inspectors noted that qualification criteria were still being developed and had not been formally implemented.

(Closed) 84-18-14(d): Complete installation, testing, and turnover of the Technical Support Center (TSC) communications, ventilation, radiation monitoring, Emergency Response Facility Data System (ERFDS), personnel dosimetry, and thyroid blocking systems and equipment.

The inspectors observed the layout of the TSC, held discussions with licensee personnel and determined that installation, testing, and turnover of all items have been adequately completed with the exception of installation of the Emergency Response Facility Data System (ERFDS). The licensee is required to complete installation of the ERFDS by license condition.

(Closed) 84-18-26: Identify permanent backup capability for performing chemical and radiochemical analysis during emergencies, so that the time for sample measurement and analysis will not exceed the limits of NUREG-0737.

The inspectors reviewed a study of the licensee's onsite permanent counting facilities for post accident sample analysis and determined that the capability exists to perform chemical and radiochemical analysis which meets NUREG-0737 criteria and will be available under the most severe accident conditions.

(Closed) 84-18-29: Provide equipment, supplies and procedures for the decontamination facility and modify the internal structure of this facility to ensure adequate contamination control.

The inspectors noted that the NRC resident inspector observed the decontamination facilities and determined that they are adequate to ensure proper contamination control.

(Closed) 84-18-30: Develop means for the disposal of radioactive wastes at assembly areas.

This item was inspected and determined adequate in Inspection Report 50-352/85-26.

(Closed) 84-18-45: Complete installation and testing, and ensure operation of the prompt alert and notification (siren) system in the plume exposure EPZ.

The inspectors observed the testing of several sirens throughout the EPZ, and held a discussion with licensee contractors regarding the methods used for ensuring adequate operation of the prompt alert and notification system, and concluded that the system provides adequate coverage throughout the EPZ. Furthermore, the inspectors reviewed a letter from the contractor to the licensee dated March 7, 1985, certifying the adequacy of the prompt notification system.

(Closed) 84-18-46: Provide a means to ensure reliability and operation of the siren warning system.

The inspectors reviewed several quality assurance test results pertaining to the onsite evacuation siren and concluded that the reliability and operation of the site warning system was adequate.

3.0 Exit Interview

On March 8, 1985, the inspectors met with those individuals identified in Section 1 and discussed inspection findings.

At no time during this inspection were written materials given to the licensee by the inspectors.