



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA STREET, N.W.
ATLANTA, GEORGIA 30323

APR 08 1985

Report Nos.: 50-338/85-08, 50-339/85-08

Licensee: Virginia Electric and Power Company
Richmond, VA 23261

Facility Name: North Anna Power Station

Docket Nos.: 50-338, 50-339

License Nos.: NPF-4, NPF-7

Inspection Conducted: March 18-22, 1985

Inspector: J. L. Kreh 04-05-85
J. L. Kreh Date Signed

Approved by: Douglas M. Collins 4-5-85
for W. E. Cline, Chief Date Signed
Emergency Preparedness Section
Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection involved 32 inspector-hours onsite and 2 inspector-hours offsite in the area of emergency preparedness.

Results: No violations or deviations were identified.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *E. W. Harrell, Station Manager
- *M. L. Bowling, Assistant Station Manager, Safety and Licensing
- R. O. Enfinger, Superintendent Operations
- *J. W. Martin, Jr., Director Emergency Planning (Corporate)
- R. E. Beckwith, Coordinator Emergency Planning (Corporate)
- *S. A. Harrison, Coordinator Emergency Planning (Station)
- *A. L. Hogg, Jr., Manager QA
- *R. T. Johnson, QA Staff Engineer
- F. P. Miller, Supervisor QC
- J. W. Winn, Senior QC Inspector
- W. R. Madison, Senior Instructor
- G. B. Crisman, Shift Supervisor
- S. P. Hughes, Shift Supervisor
- P. A. Kemp, Shift Supervisor

Other Organizations

- G. O'N. Urquhart, Chief, Radiological Planning Branch,
Department of Emergency Services, Commonwealth of Virginia
- W. H. Towsey, Chief, Mineral (VA) Volunteer Fire Co.
- W. L. Harper, Member, Louisa County (VA) Board of Supervisors

NRC Resident Inspectors

- *M. W. Branch
- *J. G. Luehman

- *Attended exit interview

2. Exit Interview (30703)

The inspection scope and findings were summarized on March 22, 1985, with those persons indicated in paragraph 1 above. Two findings were identified as possible violations. These were related to protective action decision-making and the annual independent review of the emergency preparedness program. During a telephone conversation on March 28, 1985, the inspector informed a licensee representative that further review in the Regional Office determined that the two findings in question did not constitute violations. The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspector during this inspection.

3. Protective Action Decision-Making (82202)

Pursuant to 10 CFR 50.47(b)(9) and (10) and 10 CFR Part 50, Appendix E, Section IV.D.3, this area was inspected to determine whether the licensee had 24-hour-per-day capability to make recommendations to protect the public and onsite workers.

The inspector discussed responsibility and authority for protective action decision-making with licensee representatives and reviewed pertinent portions of the licensee's emergency plan and procedures. The plan and procedures clearly assigned responsibility and authority for accident assessment and protective action decision-making. Interviews with members of the licensee's emergency organization revealed that these personnel understood their authorities and responsibilities with respect to accident assessment and protective action decision-making.

Walk-through evaluations involving protective action decision-making were conducted with three Shift Supervisors. Personnel interviewed appeared to be cognizant of appropriate onsite protective measures and aware of the range of protective action recommendations appropriate to offsite protection. Personnel interviewed were aware of the need for timeliness in making initial protective action recommendations to offsite officials. Interviewees demonstrated adequate understanding of the requirement that protective action recommendations be based on core condition and containment status even if no release is in progress.

The licensee's guidelines for the choice of protective actions during an emergency are required by 10 CFR 50.47 (b)(10) to be consistent with Federal guidance. However, the inspector noted during a review of Emergency Plan Implementing Procedure (EPIP)-1.05 ("Response to General Emergency") that, under certain accident conditions, the procedure could produce an initial protective action recommendation involving evacuation of the public, which would be more conservative than the initial recommendation specified by Federal guidance (namely, shelter in all sectors to 2 miles and in downwind sectors to 5 miles). This variance from published Federal guidance was discussed as a possible violation during the exit meeting. After further review, it was determined that the methodology used by the licensee was acceptable from a standpoint of protecting the health and safety of the general public (see paragraph 2).

No violations or deviations were identified.

4. Changes to the Emergency Preparedness Program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR Part 50, Appendix E, Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection (February-March 1984) and to note how these changes affected the overall state of emergency preparedness.

The inspector discussed the licensee's program for making changes to the emergency plan and implementing procedures. The inspector reviewed the licensee's system for review and approval of changes to the plan and

procedures. The inspector verified that changes to the plan and procedures were reviewed and approved by management. It was also noted that all such changes were submitted to NRC within 30 days of the effective date, as required.

Discussions with licensee representatives indicated that no significant modifications to facilities, equipment, or instrumentation had been completed since the last inspection. Permanent structures for the Technical Support Center and the Local Emergency Operations Facility were observed to be under construction.

The organization and management of the emergency preparedness program were reviewed. The inspector verified that there had been no significant changes in the organization or assignment of responsibility for the plant and corporate emergency planning staffs since the last inspection. The inspector's discussion with licensee representatives disclosed that the only significant change in the organization and staffing of the offsite support agencies was appointment of a new Acting Administrator/Emergency Director for Louisa County as of February 1, 1985.

The inspector reviewed the licensee's program for distribution of changes to the emergency plan and procedures. Document control records for the period March-November 1984 showed that appropriate personnel and organizations were sent copies of plan and procedural changes, as required.

No violations or deviations were identified in this program area.

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

Pursuant to 10 CFR 50.47(b)(15) and 10 CFR Part 50, Appendix E, Section IV.F, this area was inspected to determine whether emergency response personnel understood their emergency response roles and could perform their assigned functions.

The inspector reviewed the description (in the emergency plan) of the training program, training procedures, and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

Records of training for key members of the emergency organization for the period February-October 1984 were reviewed. The training records revealed that personnel designated as alternates or given interim responsibilities in the emergency organization were provided with appropriate training. According to the training records, the type, amount, and frequency of training were consistent with approved procedures.

The inspector conducted walk-through evaluations with selected key members of the emergency organization. During these walk-throughs, individuals were given various hypothetical sets of emergency conditions and data and asked to respond as if an emergency actually existed. The individuals demonstrated familiarity with emergency procedures and equipment, and no problems

were observed in the areas of emergency detection/classification and protective action decision-making.

No violations or deviations were identified in this program area.

6. Licensee Audits (82210)

Pursuant to 10 CFR 50.47(b)(14) and (16) and 10 CFR 50.54(t), this area was inspected to determine whether the licensee had performed an independent review or audit of the emergency preparedness program.

Records of audits of the program were reviewed. The records showed that an independent audit of the program was conducted by the licensee's Quality Assurance Department on May 24-July 2, 1984. This audit fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated. Audit findings and recommendations were presented to plant and corporate management. A review of past audit reports indicated that the licensee complied with the five-year retention requirement for such reports.

Licensee emergency plans and procedures required critiques following exercises, and an evaluation process following drills. Licensee documentation showed that these requirements were followed, resulting in identification of deficiencies and recommendations for corrective action.

The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed. Licensee procedures required follow-up on deficient areas identified during audits, drills, and exercises. The inspector reviewed selected licensee records which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a Computer Tracking System (CTS) as a management tool in following up on actions taken in deficient areas.

No violations or deviations were identified in this program area.

7. Coordination with Offsite Agencies (92706)

The inspector held discussions with licensee representatives regarding the coordination of emergency planning with offsite agencies. Written agreements existed with those offsite support agencies specified in the emergency plan, and the agreements had been renewed within the past two years, as required. The inspector determined through interviews with representatives of selected local and State support agencies that the licensee was periodically contacting those agencies for purposes of offering training and maintaining mutual familiarization with emergency response roles. Those interviews disclosed no significant problems related to the interfaces between the licensee and the offsite support agencies listed in paragraph 1.