

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-255/86009(DRSS)

Docket No. 50-255

License No. DPR-20

Licensee: Consumers Power Company
212 West Michigan Avenue
Jackson, MI 49201

Facility Name: Palisades Nuclear Power Plant

Inspection At: Covert, MI

Inspection Conducted: February 26-28, 1986

Inspectors: *J. Patterson*
J. Patterson

3-17-86
Date

T. Allen
T. Allen

3-17-86
Date

Approved By: *W. Snell*
W. Snell, Acting Chief
Emergency Preparedness Section

3/18/86
Date

Inspection Summary:

Inspection on February 26-28, 1986 (Report No. 50-255/86009(DRSS))

Areas Inspected: Special unannounced inspection of the following areas of the emergency preparedness program: emergency detection and classification, notifications and communications; and training related to the licensee's commitments to improve their emergency preparedness program, particularly those areas defined as a result of the August 20, 1985 annual emergency exercise. The inspection involved 42 inspector-hours onsite by two NRC inspectors.

Results: No violations, deficiencies or deviations were identified as a result of this inspection.

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DETAILS

1. Persons Contacted

- *J. Lewis, Technical Director
- *W. Beckman, Radiological Services Manager
- P. Bruce, Electrical Engineering and Maintenance Superintendent
- *R. Fenech, Technical Engineer
- *D. Fitzgibbon, Senior Licensing Engineer
- *D. Malone, Senior Engineer
- *R. McCaleb, Director, Palisades Quality Assurance
- *L. Kenaga, Staff Health Physicist
- *J. Brunet, Emergency Planning Coordinator, Palisades
- *D. Fugere, Emergency Planner, Corporate
- M. Hobe, Emergency Planning Trainer, Midland Training Center
- R. Rice, Nuclear Plant Operations Manager
- G. Sleeper, General Engineer, Plant Safety Engineering

*Denotes those attending the exit meeting on February 28, 1986.

2. Licensee Actions on Previously-Identified Items Related to Emergency Preparedness

- a. (Open) Open Item No. 255/85016-05: The EOF needed more space for NRC, FEMA and other Federal participants for any future joint exercise or real event participation to meet NUREG-0696 guidelines. The inspectors reviewed the changes made so far with the Site Emergency Planning Coordinator. A work table has been positioned at a right angle to the EOF Director's table with three outside telephones available for NRC's use. Also, work space and a conference area have been made available in the adjoining Manor House area. Five telephone lines were made available in the work area room, while three telephone lines were provided in the conference room which adjoins the work area. The space for each of these Manor House rooms seemed adequate to the inspectors. The telephones in the EOF are not labelled as yet, nor are the actual telephones installed in the Manor House. This item remains open pending installation of telephones in the Manor House area.

- b. (Closed) Open Item No. 255/85033-01: Commitment 2(d) from the list of corrective actions resulting from the May 3, 1985 management meeting has been met by the licensee. The self-study method for Site Emergency Plan (SEP) training now provides for a qualified instructor to be available and administer an exam to those using the self-study method, particularly for requalification training. This item has been clarified between the Emergency Planning Coordinator (EPC) and the inspector (Reference letter of February 25, 1986 from B. D. Johnson, Consumers Power Company, to J. G. Kenpler, Region III, U. S. Nuclear Regulatory Commission). This item is closed.

- c. (Closed) Open Item No. 255/85033-03: On the previous inspection of December 16-19, 1985 outdated maps of Van Buren County and Berrien County were found in the TSC, EOF and in the kits used for offsite radiation monitoring personnel. The inspector verified that the licensee has replaced those maps at the locations specified above with current, updated maps for Van Buren, Berrien and also Allegan Counties. This item is closed (Reference Section 4, Issue 4).
- d. (Open) Open Item No. 255/85033-04: This item concerns the need for additional drills and training on better contamination control practices and to eliminate simulation in future exercises, drills or real events. The inspectors confirmed that the licensee's efforts are progressing in this area, and a May 1986 OSC drill is scheduled to address this issue. The drill scope and objectives were reviewed by the inspectors, including the use of step-off pads, and found acceptable. This item will remain open until satisfactorily demonstrated in PALEX-86 (Reference Section 4, Issue 4).
- e. (Open) Open Item No. 255/85033-05: This item concerns the present structural design of the TSC including the office dividers which tended to inhibit communication in the PALEX-85 exercise. An interim Palisades site committee including the Facilities Manager and the EP Coordinator, among others, have evaluated the current TSC setup. Their conclusion is that the cubicle office setup will remain, since no acceptable office space could be found for the present TSC office occupants. This decision had not been officially approved by the Plant General Manager or Corporate management at the time of this inspection. This item remains open (Reference Section 4, Issue 8).
- f. (Closed) Open Item No. 255/85033-06: This item concerns the misunderstanding by some PALEX-85 exercise players of the responsibility and authority within the EOF, particularly for the position of EOF Director and HP Team Leader. Revisions in the SEP have been made since the previous inspection to include statements to clarify the responsibility of the EOF Director in the event of a conflict between the Site Emergency Director (SED) and the EOF Director. If such a conflict occurred, the EOF Officer would resolve the issue. These draft revisions of the SEP include Sections 5.4.1, 5.5.10 and 5.5.15. The changes made as evaluated in the previous inspection, plus these SEP revisions, adequately complete Issue 13. This item is closed.
- g. (Open) Open Item No. 255/85033-07: This item relates to the ability to monitor, assess, and trend radiological field data in PALEX-85. Since the previous inspection, trend graphs have been completed for the Emergency Response Facilities (ERFs) to be used for comparison of dose rates between values reported by the offsite teams and calculated whole body and thyroid dose rates. These trend graphs will be mounted in the ERFs. Lesson plans in dose assessment have been adjusted to meet the needs of HP technicians and other categories of emergency response personnel to better utilize the radiation survey data from the offsite teams. The licensee decided a revision of current

Emergency Plan Implementing Procedures (EPIPs) was not necessary. Methodology to assist the lead person in using present EPIPs and better managing the teams and their field-generated information is being followed. Current actions are on schedule; however, training with the new lesson plans was just starting at the time of this inspection. This item will remain open until the issue is adequately demonstrated in PALEX-86.

- h. (Open) Open Item No. 255/85033-08: This item relates to the EOF HP team not properly performing dose assessment functions, which led to some confusion between the licensee and the State of Michigan on source term, calculated dose rates, and adequate size of the protective action area. Another drill involving the EOF and TSC is planned for April or May 1986. The new IBM PC computer for dose assessment use should be operational, and emergency response personnel assigned to this function will be trained. Resolution of this issue is progressing satisfactorily, but is still open pending satisfactory demonstration in PALEX-86 (Reference Section 4, Issue 15).

3. Activation of the Site Emergency Plan

The inspectors reviewed and evaluated four activations of the SEP that occurred between December 20, 1985 and February 26, 1986. The four emergency classifications, Notices of Unusual Events (NUEs), were correctly made and based on the applicable Emergency Action Level (EAL). Notifications were made to State, Counties and to the NRC within the required times.

4. Status of Corrective Actions Initiated to Improve the Emergency Preparedness Program Including Responses to Emergency Exercise Weaknesses as Identified in Report No. 50-255/85016 from the PALEX-85 Exercise

Issue 1

No change since the previous inspection. The timetable for review of PALEX-86 scenario to ensure that the scenario events clearly define the desired actions and that proper contingency messages are available to assist the Controller is still scheduled for July 5, 1986.

Issue 3

Since the previous inspection, another OSC drill plan has been developed. The inspectors reviewed the drill scope and objectives and found them satisfactory in addressing areas of concern from the PALEX-85 exercise. Increased use of anti-contamination clothing, radiation boundaries, step-off pads, along with demonstration of good contamination controls are among the drill objectives for the May 1986 drill. Progress on this issue is satisfactory.

Issue 4

The drill scope of the May 1986 OSC drill will include telephone communications with the TSC and radio communications to the EOF Health Physics Communicator. The inspectors' review of the drill scope and

objectives of this drill concluded that it also meets most of the remaining objectives of Issue 4. If step-off pads and other contamination control practices are demonstrated in the May 1986 drill, the corrective actions recommended will be completed except for satisfactory demonstration in the PALEX-86 exercise. The inspector concluded that the licensee's actions are satisfactory and progress is continuing to resolve Issue 4.

Issue 6

This issue concerns attitude problems as observed in PALEX-85 and is being continually addressed by the licensee in drills, training sessions, and instructions to those with emergency response functions, as confirmed by the inspectors. This issue remains open until satisfactorily demonstrated in PALEX-86.

Issue 8

This issue concerns the recently completed licensee evaluation of the TSC design and layout including the present arrangement of office cubicles. This item is also described in Section 3.e of this report. One additional change has been the installation of another speaker in the office cubicle area for better sound reception when announcements are made from the SED and/or his emergency support managers.

Issues 10 and 11

Status remains unchanged on these two issues, which include better training for exercise Controllers to improve their performance and also planning to avoid a shortage of Controllers for future exercises.

Issue 12

No changes in this issue have occurred since the last inspection. Training with State and local government representatives to increase the coordination with the licensee in the Joint Public Information Center cannot be scheduled until closer to the completion date of this issue, namely, July 29, 1986.

Issue 14

This issue has previously been described in Section 3.g of this report. The licensee had four items of resolution to complete (Report No. 255/85016). Two of these (Items 1 and 4) were completed prior to this inspection. A more efficient and practical methodology for controlling the offsite teams is being developed as part of Item 2. This issue is being addressed satisfactorily.

Issue 15

This issue concerns the unacceptable performance of the EOF HP team in properly performing the required dose assessment functions in PALEX-85. This resulted in confusion between the licensee and the State of Michigan

on source term, calculated dose rates, and the proper protective action recommendations. Dose assessment training on the new IBM PC computer was scheduled to begin the week of March 3-7, 1986. This facet of the issue and the planned TSC-EOF drill tentatively scheduled for April and May 1986 should do much to resolve this exercise related weakness (Reference Section 3.g).

Issue 16

The licensee has revised GORT Procedure EOF-3 to establish the position of EOF Administrator. This individuals duties are clearly defined to manage the EOF and direct the actions of the interim plant personnel until the arrival of the EOF Director. Procedure EI-4.3 has also been revised to eliminate the previous position of EOF Leader. This issue is closed.

5. Update on Site Emergency Plan Training Program

The SEP Training Program has been revised, effective January 27, 1986. Lesson plans have been revised since PALEX-85 to include statements that any simulations in drills and exercises will not be acceptable, with few exceptions. Criticisms, suggestions, or proposed changes which result from critiques after a drill, exercise or an emergency response training class are noted, and if shown to have merit, are listed on an Actions Items Request (AIR) form. This is then put on a computerized tracking system and resolution is assigned. Depending on the item, it could be included in the next lesson plan for that course. The NRC inspection reports are also used as input for this AIR form. The emergency planning matrices have been revised since the previous inspection to update the list of courses with the emergency response titles. Courses are now offered four times yearly to accommodate all. Supervisors are sent printouts of their employees who require emergency response training three months before the 12 month deadline. This change was made to help eliminate the possibility of exceeding the annual period for required training. A list of all EP courses offered for the year is sent to each site EPC for distribution to supervisory personnel.

The inspectors interviewed five individuals with the following emergency response titles: Site Emergency Director; Engineering and Maintenance Support Group Leader; Communications Support Group Leader; Communications Support Team Member; and Health Physics Support Group Leader. All were knowledgeable of their emergency response functions and demonstrated competence in fulfilling their emergency roles. None were found to be deficient in their EP training requirements.

6. Exit Interview

The inspectors held an exit interview on February 28, 1986, with those licensee representatives denoted in Section 1 of this report. The inspectors determined from the licensee that none of the information discussed was proprietary in nature. The inspectors discussed the scope and findings of the inspection; and concluded that emphasis was continuing on improving the content and quality of the emergency preparedness program, from both a plant specific and corporate level of management.