

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-346/86008(DRSS)

Docket No. 50-346

License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, OH 43652

Facility Name: Davis-Besse Nuclear Power Station, Unit 1

Meeting At: Region III Office, Glen Ellyn, IL

Meeting Conducted: February 14, 1986

Prepared By: *T. Ploski*
T. Ploski

2/24/86
Date

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

2/24/86
Date

Meeting Summary

Meeting on February 14, 1986 (Report No. 50-346/86008(DRSS))

Areas Discussed: Completion status of emergency response facilities; progress on revision to the emergency organizational structure; proposed annual emergency organization training program for station personnel; five year plan for drills and exercises; upgrade of the prompt notification (siren) system; upgrade of the emergency organization's paging equipment; upgrade of radiation monitoring teams' equipment; status of the 10-mile Emergency Planning Zone (EPZ) boundary issue; status of the emergency planning group's staffing; and revision to the Emergency Plan. The meeting involved three inspector hours by two NRC inspectors.

Results: No violations of NRC requirements or deviations from commitments were identified.

DETAILS

1. Meeting Attendees

Toledo Edison Company

R. Varley, Emergency Planning Supervisor
S. Cope, Lead Onsite Emergency Planner
J. Lietzow, Nuclear Licensing Specialist

NRC Region III

M. Phillips, Chief, Emergency Preparedness Section
T. Ploski, Emergency Preparedness Analyst

2. Meeting Details

a. Overview

This meeting was held at the request of Toledo Edison Company in order that representatives of its Emergency Planning (EP) staff could discuss the status of a number of current activities and potential changes affecting the emergency preparedness program at the Davis-Besse Station. Licensee representatives also presented a document titled "NRC Meeting - An Emergency Planning Update - February 14, 1986" to the inspectors which contained detailed information in support of the topics discussed. As indicated later in this report, the inspectors offered suggestions or expressed concern on some of the items discussed. The meeting constituted an exchange of information and opinions, rather than representing final NRC approvals on the items discussed. The licensee indicated at the conclusion of the meeting that none of the matters discussed were proprietary in nature.

b. Completion Status of Emergency Response Facilities

The licensee has completed the Technical Support Center (TSC) relocation feasibility study and has concluded that the TSC will remain in the Davis-Besse Administration Building (DBAB). However, the senior Chemistry and Health Physics (C and HP) individual onsite will probably no longer report to the TSC. Instead, current plans were for this person to join a senior operations engineer in the former Central Alarm Station (CAS), located adjacent to the Control Room. The inspectors had the following concerns and recommendations: the licensee must ensure that the former CAS workspace is sufficient to also accommodate two or three members of an NRC Site Team, who need to be located with the senior C and HP individual responsible for inplant health physics operations; that the Health Physics Network (HPN) telephone located in the TSC would probably have to be moved to the CAS workspace; and that the use of this workspace by senior operations and C and HP personnel must be demonstrated in the 1986 exercise - assuming that the licensee proceeds with plans to utilize this workspace for these individuals.

The licensee plans to expand the Emergency Control Center (ECC), located in the DBAB. The ECC is its Emergency Operations Facility. The ECC would also include what is presently a small conference room adjacent to the ECC. This expansion would result in ECC dose assessment personnel being relocated from a rear corner of the ECC into the former small conference room. The inspectors recommended that the licensee plan for the NRC Site Team's dose assessment personnel to locate themselves and their equipment in the same work area as their licensee counterparts. The licensee indicated that this ECC expansion would be completed by the 1986 exercise and would be utilized during that event.

The licensee indicated that there were no current plans to relocate or reconfigure its Operational Support Center (OSC).

The inspectors concluded that an Emergency Response Facility (ERF) appraisal for the Davis-Besse Station would be inappropriate until sometime after the September 1986 exercise.

c. Progress on Revisions to the Station's Emergency Organizational Structure

The licensee indicated that the revised onsite emergency organization was in the later stages of development and would be described in the next Emergency Plan revision, scheduled to be issued in March 1986. The revised organization's capabilities would be demonstrated in the September 1986 exercise. Some significant planned changes are described in the following paragraphs:

Persons filling the Emergency Director (ED) and senior company spokesperson positions would be two individuals from a pool of five senior Nuclear Mission personnel. Primary responsibility for determining the applicability of, and advising the ED on onsite and offsite Emergency Action Levels (EALs) would rest with the Emergency Plant Manager (EPM) and Emergency Offsite Manager (EOM), respectively. An NRC Liaison position and an Emergency Planning Advisor would be added to the ECC staff. As mentioned earlier in this report, the senior C and HP individual responsible for inplant health physics activities would be part of the TSC's organizational structure, but would be physically located in a workspace adjacent to the Control Room with a senior operations person titled the Emergency Assistant Plant Manager (EAPM). Regarding the transfer of undelegatable emergency responsibilities from the Shift Supervisor (SS) to the Emergency Director, the licensee indicated that there was internal concern to minimize the number of possible intermediate transfers of these responsibilities. At present, it appeared that the undelegatable responsibilities could be held on an interim basis by the EAPM, EPM, and/or EOM prior to their ultimately remaining with the ED. The inspectors shared the licensee representatives' concern that the number of intermediaries to whom undelegatable responsibilities could be transferred should be minimized.

The OSC would continue to be run by an OSC Manager physically located in the OSC. This individual would be assisted by a Materials Manager and Assistant OSC Manager, drawn from warehouse and maintenance supervisory personnel, respectively. The OSC Manager would also have a Fire Protection Advisor and an Operations Advisor. These assistants and advisors would be physically located in the OSC.

Direction of offsite Radiation Monitoring Teams (RMTs) and the DBAB's Radiation Testing Laboratory (RTL) would be among the responsibilities of the Dose Assessment Coordinator in the ECC. Thus, the RTL would no longer be under the control of the C and HP Superintendent responsible for implant health physics activities. The RTL Coordinator would, however, retain responsibility for habitability monitoring of all ERFs. A new position, Environmental Advisor, would also be added to the Dose Assessment Coordinator's staff.

d. Proposed Annual EP Training Program for Station Personnel

The lead onsite emergency planner has been developing the annual EP training program for station personnel. Although contents of specific courses were still under development, the following had been decided upon: training modules would include relevant emergency plan implementing procedures; all Control Room personnel in the normal line of succession to the SS would receive the same EP training as the SS; the emergency planning staff would conduct the bulk of the EP training; and introductory training would first be given to persons newly assigned to the station's emergency organization. The licensee also indicated that C and HP staff would no longer be assigned to offsite RMTs. The licensee assured the inspectors that additional training on radiation hazards and survey techniques would be provided to non-C and HP personnel assigned RMT duties.

The licensee indicated that 1986 EP training activities would largely be completed between the issuance of the next plan revision in April and the September exercise.

e. Five Year Plan for Drills and Exercises

The licensee briefly discussed a draft five year plan for meeting all annual exercise objectives as perceived from guidance in NUREG 0654, Revision 1. The inspectors agreed that Objective No. 6, which addressed the frequency of exercise participation with the NRC, should be revised to indicate that joint participation would occur on an "as needed" basis.

Regarding EP drills, the licensee was still debating to what extent EP drill requirements could be met by conducting the drills during the annual exercise. The inspectors agreed that the annual assembly/accountability drill is typically done during exercises in this Region. However, for other types of EP drills, regional staff has discouraged licensees from scheduling drills during exercises. An exercise is a demonstration of the capabilities of trained persons to perform their emergency duties under simulated emergency

conditions. As such, except for safety considerations, exercise participants are expected to be able to perform their duties without the benefit of on-the-spot correction or coaching by controllers. However, without the benefit of real-time participant/controller feedback, some of the training benefits available during a drill experience are not available to an exercise participant. In summary, the inspectors discouraged the licensee from seeking to obtain credit for most kinds of EP drills by conducting the drills during an annual exercise.

f. Upgrading of the Prompt Notification (Siren) System

The licensee stated that a vendor has been selected to upgrade the siren system by the Fall of 1986, at an approximate cost of \$500,000. System upgrade is primarily intended to improve siren operability and ease of testing. At least some emergency and preventive maintenance activities would continue to be done by personnel from the licensee's Lindsey Station.

g. Upgrading of the Emergency Organization's Paging System

System upgrading should be completed by the September 1986 exercise. Improvements are intended to reduce the activation burden on Control Room personnel and to provide better indications regarding which personnel have acknowledged the pager activation.

h. Upgrade of Radiation Monitoring Team Equipment

The licensee indicated that the following upgrades were being instituted and would be ready for demonstration during the September 1986 exercise:

- Procurement of two new four-wheel drive vehicles, assigned to the Emergency Planning group, but intended for RMT use during an emergency;
- Vehicle equipment would include AM/FM radios to permit reception of EBS messages and improved radio communications equipment; and
- RMT kits would contain PIC-6A, PRM6 with an HP260 probe, and an E520. These changes should improve the capability to detect very low activity levels and to more accurately measure higher radiation fields.

i. Current Status of the 10 Mile Emergency Planning Zone (EPZ) Boundary Issue

The licensee presented copies of the various documents submitted by the Ohio Disaster Services Agency to the Federal Emergency Management Agency (FEMA) by correspondence dated February 4, 1986. The licensee indicated that it, the State, and the affected local

governmental organizations had reached agreement on a proposed border for the EPZ, and that the parties were awaiting feedback from FEMA. The inspectors forwarded a copy of the February 4 submittal to Region III's State and Governmental Affairs staff.

j. Status of the Emergency Planning Group's Staffing

The individual who had been assigned offsite emergency planning responsibilities for State agency interface and medical drill coordination recently accepted another Nuclear Mission position. Interviews for a replacement were already underway. The licensee indicated that the replacement would, however, be given lead responsibility for all State and local government Emergency Planning interfaces. Therefore, the Emergency Planning Supervisor would have a lead individual assigned for each of the following areas of emergency planning: onsite, corporate, and offsite.

k. Revision to the Emergency Plan

The next revision to the plan was still scheduled to be issued in March 1986. The licensee indicated that it would probably seek to delete a commitment in Section 6.4.4 to the current plan revision which indicated that Toledo Edison had the responsibility to make protective action recommendations to State and local officials for the 50 mile (Ingestion Exposure) EPZ. The only basis for having this commitment in the current plan appeared to be a March 27, 1980 response from the licensee to an NRC/FEMA review of emergency planning for the Davis-Besse Station that was conducted during February 1980. The inspectors' initial opinion was that the licensee should view the proposed deletion of this commitment as being interpreted as a possible "decrease in the effectiveness of the emergency plan" which would require prior NRC approval before the revised plan could be implemented. The inspectors did agree to begin determining the regulatory basis for the 1980 decision which required addition of this commitment to the licensee's emergency plan.