

ENCLOSURE

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

Docket No.: 50-285
License No.: DFR-40
Report No.: 50-285/98-18
Licensee: Omaha Public Power District
Facility: Fort Calhoun Station
Location: Fort Calhoun Station
FC-2-4 Adm.
P.O. Box 399, Hwy. 75 - North of Fort Calhoun
Fort Calhoun, Nebraska
Dates: August 31 through September 2, 1998
Inspectors: Thomas H. Andrews, Emergency Preparedness Analyst (Team Leader)
Randolph L. Sullivan, Emergency Preparedness Specialist
James B. O'Brien, Emergency Preparedness Specialist
Approved By: Blaine Murray, Chief, Plant Support Branch
Division of Reactor Safety
Attachment: Supplemental Information

EXECUTIVE SUMMARY

Fort Calhoun Station
NRC Inspection Report 50-285/98-18

A reactive, announced inspection was conducted involving changes to the Fort Calhoun Station radiological emergency action levels.

Plant Support

- An unresolved item was identified related to changes made to emergency action levels that may have resulted in a reduction in the effectiveness of the emergency plan (Section P3).

Report Details

IV. Plant Support

P3 EP Procedures and Documentation

a. Inspection Scope

In 1997 and 1998, the licensee made changes to the emergency action levels contained in Emergency Plan Implementing Procedure EPIP-OSC-1, "Emergency Classification." In accordance with 10 CFR 50.54(q), these changes were reviewed by the licensee and a determination was made that the changes did not result in a reduction in the effectiveness of the emergency plan. The changes made by Revision 27 were extensive, and Revision 28 made further changes to the emergency action levels. Based upon an in-office review, over 80 issues were identified that needed additional information before the significance of the changes could be resolved. During this inspection, the inspectors reviewed documentation associated with these issues to determine their significance.

a. Observations and Findings

Discussions with licensee personnel provided useful insight into how the emergency action levels were developed and how they are used at the licensee's facility. Most of the issues identified during the in-office review were determined to be of minor significance or were resolved.

Prior to the inspection, the licensee conducted an audit of the changes made to the emergency action levels. The audit was very thorough and comprehensive. The licensee-identified areas where improvements were needed and initiated corrective actions to address these areas. The inspectors noted that one reference used to justify the appropriateness of changes was a draft guidance document that had not been endorsed by the NRC. Therefore, some of the results of the audit were different from the findings made by the inspectors.

During the inspection, there were several changes to emergency action levels that may have resulted in a reduction in effectiveness of the emergency plan. If these changes did result in a reduction in effectiveness of the emergency plan, it would be a violation of 10 CFR 50.54(q). The changes identified as potential reductions during the inspection included:

- Emergency Action Level 1.1 - RCS radioactivity exceeds technical specification limits
- Emergency Action Level 8.5 - General area radiation/airborne levels outside containment are > 1,000 times background
- Emergency Action Level 9.1 - A confirmed hostage situation is occurring in the protected area, but outside of the vital areas

- Emergency Action Level 9.3 - Bomb/sabotage device detected in the protected area, but outside the vital areas
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- Emergency Action Level 9.4 - Confirmed protected area intrusion
- Emergency Action Level 9.5 - Confirmed hostage situation in a vital area
- Emergency Action Level 9.7 - A confirmed bomb/sabotage device has been detected in a vital area
- Emergency Action Level 9.8 - A confirmed vital area intrusion is occurring
- Emergency Action Level 9.9 - Confirmed armed attack is occurring inside a vital area affects the ability to maintain functions needed for cold shutdown
- Emergency Action Level 9.10 - Confirmed Armed Attack Inside a Vital Area That Affects The Ability to Maintain Functions Needed For Hot Shutdown

The most significant concerns were associated with emergency action levels for security events for the site area emergency and general emergency classifications. Emergency Action Levels 9.9 and 9.10 did not appear to be consistent with regulatory guidance.

According to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants," Revision 1, a site area emergency would be declared for imminent loss of physical control of the plant. A general emergency would be declared for loss of physical control of the facility. The regulatory guidance provided in NUMARC/NESP-007, "NUMARC Emergency Action Levels," Revision 2, indicated that a site area emergency would be declared for a security event in the vital area and a general emergency would be declared for loss of physical control of the plant or systems required to achieve and maintain cold shutdown.

On September 30, 1998, in a phone call between Mr. Ronald Meng and the team leader, Mr. Meng stated that Emergency Action Levels 9.9 and 9.10 were being revised to address the inspector's concerns. The revisions being made were:

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|-----------------------|--|
| Site Area Emergency - | Confirmed armed attack occurring in plant vital area |
| General Emergency - | Physical loss of control to control room or auxiliary feed water panel, or remote shutdown panel |

The inspectors determined that these changes were consistent with the NUMARC emergency action levels, and sufficient to address the immediate concerns identified during the inspection.

The Office of Nuclear Reactor Regulation (NRR) was requested to provide an agency position regarding the appropriateness of the plan changes. This matter is considered an unresolved item pending NRR action (50-285/98018-01).

c. Summary

An unresolved item was identified related to changes made to emergency action levels that may have resulted in a reduction in the effectiveness of the emergency plan.

V. Management Meetings

X1 Exit Meeting Summary

The inspectors presented the inspection results to members of licensee management at the conclusion of the inspection on September 2, 1998. The licensee acknowledged the facts presented. No proprietary information was identified.

Following NRC management review, one issue characterized as a potential violation during the exit meeting was changed to an unresolved item. A second exit meeting was conducted by telephone on September 9, 1998, to inform the licensee of this change.

On October 8, 1998, in a telephone conversations between Mr. R. Meng, Mr. E. Matzke, and the team leader, the licensee was informed that Emergency Action Level 1.1 had been omitted from the discussion during the exit meeting. Mr. Meng stated that adding this as an additional example to the unresolved item did not require another exit meeting. Mr. Meng stated that Omaha Public Power District management had been informed of the addition. Mr. Matzke stated that in response to NRC concerns, the emergency action level procedure had been revised to address Emergency Action Levels 1.1, 8.5, 9.9 and 9.10.

ATTACHMENT

SUPPLEMENTAL INFORMATION

PARTIAL LIST OF PERSONS CONTACTED

Licensee

J. Chase, Manager, Nuclear Assessment
O. Clayton, Manager, Emergency Planning
S. Gebers, Manager, Radiation Protection
T. Herman, Senior Quality Assurance Lead Auditor
R. Meng, Senior Emergency Planning Representative
H. Sefick, Manager, Security Services

INSPECTION PROCEDURES USED

IP 82701 Operational Status of the Emergency Preparedness Program

ITEMS OPENED

Opened

50-285/98018-01 URI Emergency action level changes may result in a reduction in effectiveness of the emergency plan

DOCUMENTS REVIEWED

Emergency Plan Implementing Procedures:

EPIP-OSC-1, "Emergency Classification," Revision 26
EPIP-OSC-1, "Emergency Classification," Revision 27
EPIP-OSC-1, "Emergency Classification," Revision 28

Other Documents:

Emergency Action Level Basis Document for EPIP-OSC-1, "Emergency Classification,"
Revision 27

Nuclear Safety Evaluation ID No. 47784

Nuclear Safety Evaluation ID No. 47784A

Condition Report No: 199801731

Memorandum FC-RP-119-98