



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

SEP 22 1988

Report Nos.: 50-321/88-25 and 50-366/88-25

Licensee: Georgia Power Company
P. O. Box 4545
Atlanta, GA 30302

Docket Nos.: 50-321 and 50-366

License Nos.: DPR-57 and NPF-5

Facility Name: Hatch 1 and 2

Inspection Conducted: August 15-19, 1988

Inspector: A. Gooden
A. Gooden

9/22/88
Date Signed

Approved by: Thomas R Decker
T. Decker, Section Chief
Division of Radiation Safety and Safeguards

9/22/88
Date Signed

SUMMARY

Scope: This routine, unannounced inspection was conducted to assess the operational readiness of the site emergency preparedness program, to determine if changes to the emergency preparedness program since the July 1987 inspection meet NRC requirements and commitments, and to assess the effect of these changes on the overall state of emergency preparedness. In addition, the adequacy of licensee actions taken on previously identified inspection findings were reviewed.

Results: No programmatic breakdowns were identified. However, a weakness was noted in the licensee's current administrative control practices to assure that the emergency kit's contents are current and emergency survey equipment is properly maintained. Within the areas inspected, no violations or deviations were identified. Noticeable improvements had been made in key areas such as document distribution and emergency response training. As evidenced by the allocation of resources to emergency preparedness training, the licensee's attention appears to be directed towards maintaining the emergency preparedness program in a state of operational readiness.

REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *S. Bethay, Acting Manager, Nuclear Safety and Compliance
- *C. Brown, Corporate Office, Senior Emergency Preparedness Specialist
- *C. Coggin, Manager, Training and Emergency Preparedness
- S. Cowan, Foreman, Health Physics
- G. Creighton, Senior Regulatory Specialist
- *O. Fraser, Manager, Site Quality Assurance
- *J. Lewis, Manager, Operations
- *A. Manning, Field Representative, Quality Assurance
- G. Miles, Shift Clerk
- J. Mosley, Supervisor, Site Security
- *R. Mothena, Supervisor, Site Emergency Preparedness
- *H. Nix, Plant General Manager
- *J. Payne, Senior Plant Engineer
- D. Pendry, Shift Supervisor
- J. Ray, Shift Clerk
- *D. Read, Plant Support Manager
- *J. Peddick, Supervisor, Health Physics
- *R. Reddick, Site Senior Emergency Preparedness Specialist
- *D. Smith, Health Physics Superintendent
- S. Stone, Shift Supervisor
- E. Urquhart, Operations Supervisor On-Shift

Other licensee employees contacted included technicians, security office members, and administrative personnel.

Other Organizations

- E. Carlson, Emergency Preparedness Specialist, Paragon Technical Corporation
- D. Cleckner, Emergency Preparedness Specialist, Paragon Technical Corporation

Nuclear Regulatory Commission

- J. Menning, Senior Resident Inspector

*Attended exit interview

2. Licensee Action on Previous Enforcement Matters

- a. (Closed) Violation (50-321,366/87-18-02): Failure to implement the requirements of Emergency Plan Implementing Procedure 63EP-EIP-066-0.

The inspector reviewed licensee actions on this matter and noted that actions were taken in accordance with the licensee's response to the Notice of Violation dated October 2, 1987. The inspector reviewed a memo dated October 1, 1987, which included as an attachment Procedure 63EP-EIP-066-0 data package 1, documenting the annual review (1987) of the Emergency Plan and Letters of Agreement. Also reviewed were reconstructed documentation for calendar years 1984 through 1986.

- b. (Closed) Violation (50-321,366/87-18-03): Failure to submit changes to the Emergency Plan Implementing Procedures (EIPs) within 30 days after the approval date.

The inspector noted that the licensee had made changes to the administrative controls governing the distribution of plan and procedural changes to the NRC to prevent recurrence. The distribution process was changed to require that revisions be forwarded to the site Nuclear Safety and Compliance Department for forwarding to the Corporate Office Licensing Department for distribution to the NRC. Further, the inspector reviewed the distributions and/or transmittals for EIP changes since the last routine inspection, and no problems were noted.

- c. (Closed) Violation (50-321, 366/87-18-05): Failure to implement EIP 75TR-TRN-001-05 to maintain a trained and qualified emergency response staff.

The inspector reviewed the licensee's action on this matter and noted that actions were taken in accordance with the licensee's response to the Notice of Violation dated October 2, 1987. The inspector reviewed training qualifications for several key members of the emergency organization. Names were randomly selected from the emergency call-list and position-matrix for review. No problems were noted with any records that were reviewed.

3. Emergency Plan and Implementing Procedure (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR Part 50, Appendix E, this area was reviewed to determine if the licensee's program governing changes to the Emergency Plan and EIPs had been properly implemented since the last routine inspection (July 1987). The inspector discussed with a licensee representative the licensee's program for making changes to the Plan and EIPs. The inspector verified that changes to the Plan and procedures were reviewed and approved by management in accordance with procedure 10AC-MGR-003-05 (Preparation and Control of Procedures). It was also noted that changes were being distributed to copy holders in a

timely manner as evidenced by the transmittal dates, and a review of acknowledgement slips for selected changes since the last routine inspection. The licensee maintains a log or index system which reflects the document name, current revision number, date received, and effective date or status. A controlled distribution list is maintained by document control which identifies the controlled document, receiving organization or department, position or title responsible for accountability, quantity, and the control location. The inspector reviewed documentation for the following implementing procedure changes to verify that submittals were made to NRC within 30 days of the approval date:

63EP-EIP-053-0S dated 10/29/87, mailed to NRC 11/25/87
 73EP-EIP-001-0S dated 12/4/87, mailed to NRC 12/21/87
 73EP-EIP-004-0S dated 01/21/88, mailed to NRC 02/23/88
 73EP-EIP-058-0S dated 12/26/87, mailed to NRC 02/21/87
 73EP-EIP-062-0S dated 12/06/87, mailed to NRC 12/21/87
 73EP-EIP-063-0S dated 12/06/87, mailed to NRC 12/21/87
 73EP-EIP-064-0S dated 12/06/87, mailed to NRC 12/21/87
 73EP-EIP-065-0S dated 12/06/87, mailed to NRC 12/21/87
 73EP-EIP-066-0S dated 12/06/87, mailed to NRC 12/21/87

Since the last routine inspection, only one revision had been made to the Emergency Plan (Revision 8). At the time of the inspection, this revision had not been approved by NRC in its entirety. Documentation was provided by a licensee contact to show that items requiring justification and clarification had been forwarded to NRC on June 13, 1988. Selected EIP notebooks (e.g. Control Room, Technical Support Center, Emergency Operations Facility Director, etc.) were reviewed and verified as current and up to date. The inspector concluded that all changes to the plan and/or implementing procedures were forwarded to NRC within 30 days of the approval date.

No violations or deviations were identified.

4. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Discussions were held with a licensee representative concerning modifications to facilities, equipment, and instrumentation since the last inspection. According to the licensee's contact, no changes had been made to any of the emergency response facilities.

An inspection and operability check was performed on selected equipment and support items used for emergency response in the Control Room, Technical Support Center (TSC), and Emergency Operations Facility (EOF). The inspector requested and observed an unannounced communications check from the Control Room using the Emergency Notification Network (ENN), a dedicated ring-down phone system to State and local warning points; and in the TSC and EOF, the two-way radio system with the State and local Emergency Management Agency (EMA) via the Civil Defense radio. No problems were noted with any of the communications equipment that were tested. The inspector reviewed procedure 63EP-TET-001-0S and noted that

the communications test frequency was in accordance with the aforementioned procedure. However, the inspector noted that personnel did not consistently document the test results as stated in section 7.5.3.4 of Procedure 63EP-TET-001-OS. According to the procedure, "the tester will confirm acknowledgment from each station, note any unit that does not acknowledge the test, and notify that unit by an alternate method. Enter date and time of notification on Emergency Communications Test Form (similar as Attachment 1 to procedure)." The reviewed documentation covered the time period September 1987 thru August 1988. A licensee representative agreed to revise Procedure 63EP-TET-001-OS to ensure that the appropriate documentation is entered on Attachment 1 to 63EP-TET-001-OS. The licensee was informed that this matter is considered an Inspector Followup Item (IFI) for review during a subsequent inspection.

IFI (50-321,366/88-25-01): Revise Procedure 63EP-TET-001-OS (Control and Testing of Emergency Communications Equipment) to ensure that the appropriate documentation is entered on Attachment 1 to 63EP-TET-001-OS.

In assessing the operational status of the emergency facilities, the inspector verified that reference documents, protective equipment, and supplies were periodically checked for operation and inventoried. Emergency kits and/or cabinets from the Control Room, TSC, EOF, Operational Support Center, and an External Survey Kit were inventoried and randomly selected equipment was checked for operability. The following observations were made: a) Two Kits (Control Room and External Survey Kit #2) contained outdated or superseded procedures; b) An oxygen resuscitator listed on the Control Room inventory had a green tag labeled "Empty" attached to the oxygen cylinder; c) Three survey instruments from the EOF inventory were out-of-service due to failing battery checks; d) A survey instrument at two locations was inadvertently left in the on position as opposed to off (to extend the battery life). A licensee contact discussed the above items, particularly item d), as requiring greater attention to detail and more stringent administrative control over the kits and/or cabinets. A licensee representative acknowledged the above items and agreed to upgrade administrative controls and the procedural requirements of 63EP-INS-001-OS to ensure that emergency kits and contents are being maintained current and in an operational state of readiness. The licensee was informed that this matter was considered an IFI.

IFI (50-321,366/88-25-02): Upgrade administrative controls and procedural requirements of 63EP-INS-001-OS to ensure that emergency kits and contents are being maintained current and in an operational state of readiness.

There were no further questions or concerns regarding the inventory. By review of applicable procedures and documentation for the period of November 1987 to June 1988, the inspector determined that the emergency equipment inventory was being conducted in accordance with the procedure (63EP-INS-001-OS) required frequency. The inspector also verified that current copies of the Emergency Plan and EPIPs were available in the

emergency response facilities (Control Room, TSC, and EOF). No problems were noted.

The licensee's management control program for the Prompt Notification System was reviewed. According to licensee documentation, as of June 1988, the system consisted of 2,800 tone-alert radios. The National Oceanic and Atmospheric Administration (NOAA) conducts weekly radio tests. Plant Security personnel confirm weekly test results by contacting Appling County, Toombs County, and the Hatch visitors Center. Based on the tone-alert signal strength at any of the aforementioned locations, Security affirms a positive or negative finding with the National Weather Service Office in Savannah (Agency of NOAA). Test results for the period August 2, 1987 to August 10, 1988, were randomly selected and reviewed. Results showed tests were being conducted on a weekly basis. The inspector was also provided documentation by the licensee addressing the 1987 Prompt Notification System summary status. This summary was broken down into several categories of results: 1) signal activations; 2) system outages; 3) weekly activations; 4) malfunctions causing audio distortions; and 5) the dates and cause for each of the aforementioned categories. According to licensee documentation, the licensee's rumor control group conducted a phone survey as a followup to the December 1987 exercise involving tone alert activation and found of those residents contacted, 92.3% received the tone alert activation. Documentation, dated August 12, 1987 through June 1988, was available to show that maintenance and accountability of radios was being performed on a periodic basis.

No violations or deviations were identified.

5. Organization and Management Control (82701)

The inspector's discussion with licensee representatives disclosed that several personnel changes had been made involving both the corporate and plant staff since the July 1987 inspection. According to a transition organization chart which was provided to the inspector, at the corporate office personnel changes involved the position of Executive Vice President - Nuclear Operations and the position of Manager-Training and Emergency Preparedness. Included in the Corporate Office changes is the reporting chain for emergency preparedness. At the plant, changes included the reassignment from the Plant to the Corporate Office for the position of Vice President - Nuclear (Hatch); consequently, personnel were reassigned to the positions of General Manager Plant Hatch, Plant Manager, and Operations Manager. When emergency response training records were reviewed for the individuals assigned to the aforementioned site positions, the inspector noted that the individuals had completed the required training for specific emergency response roles in accordance with Procedure 75 TR-TRN-001-0S (Emergency Preparedness Training).

Regarding changes to the offsite emergency organization, the inspector was informed that a personnel change had been made to the position of Director, Tattnal County Emergency Management Agency. No other changes had been made (i.e. State and/or agreement letters).

No violations or deviations were identified.

6. Training (82701)

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 Section O of the Emergency Plan and the Implementing Procedure (75TR-TRN-001-OS) for a description of the training program and training procedures. In addition, selected lesson plans were reviewed and a member of the training staff was interviewed. As a result, the inspector determined that the licensee had established a formal emergency training program.

In response to IE Information Notice No. 85-80, "Timely, Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications," the inspector interviewed two Shift Clerks who may be designated as an Offsite Communicator for the Control Room. The inspector interviewed the Communicators regarding various communications systems available from the Control Room for making notifications, their responsibility as a Communicator, backup communications systems, etc. No problems were noted. The interviewees demonstrated familiarity with the communications emergency procedures and equipment, and no problems were observed in the areas of equipment use, message forms (initial and followup), or responsibility as communicators.

The inspector conducted walk-through evaluations with one Operations Supervisor On-Shift, and two Shift Supervisors, who may be designated as Interim Emergency Director during backshift operations. During these walkthroughs, individuals were presented hypothetical emergency conditions and data and were asked to respond as if an emergency actually existed. All three interviewees demonstrated familiarity with the Emergency Plan, Implementing Procedures, equipment, protective action recommendations, non-delegable responsibilities, and emergency exposure limits.

Selected training records were reviewed for several key members of the onsite emergency organization. Training records were chosen based on the July 1988 list of qualified responders assigned to the emergency response position matrix. The inspector compared the emergency response position matrix (dated July 1988) to the emergency call list (revised July 1988). According to training records, when randomly selected names from the position matrix were reviewed, all training was consistent with training procedures. It was noted that in some instances, personnel were satisfying the annual training by reviewing the appropriate material and successfully completing the examination. Should personnel be unsuccessful in challenging the exam, training procedures required formal classroom attendance followed by a successful exam score. The inspector reviewed selected training records for the period January 1987 to May 1988. No problems were noted. The inspector noted during the records review that the licensee's corrective actions in response to NRC inspection finding 87-18-05 appeared to have been effective in preventing unqualified

personnel from being assigned to the emergency response organization. An emergency response position matrix containing the names of qualified individuals was noted at the EOF and TSC. In addition, the inspector reviewed copies of the Emergency Response Training Status Reports dated September 1987 and May 1988 which identified qualified and unqualified personnel to fill various emergency response positions. This report is distributed to all Department Managers and Plant Management.

No violations or deviations were identified

7. Independent Review/Audit (82701)

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

According to documentation provided to the inspector, independent audits of the program were conducted by the Plant Hatch Quality Assurance Department on the following dates: September 21, 1987 through October 1, 1987 (documented in Audit Report No. 87-EP-2), and March 21-25, 1988 (documented in Audit Report No. 88-EP-1). The Georgia Power Corporate Quality Assurance Office conducted an audit during April 25, 1988 through May 3, 1988 (documented in Audit Report No. 88-EP-1). The aforementioned audits fulfilled the 12-month frequency requirement for such audits. Findings that resulted from these audits were presented to Plant and Corporate management. A further review regarding the actions taken in response to those findings disclosed that Plant and/or Corporate Management had reviewed the findings and assigned milestones for resolving these items.

The licensee's program for followup action on audit, drill, and exercise findings was reviewed. The exercise and drill findings were tracked in accordance with the Training Department Procedure DI-TRN-0685N entitled "Training Department Action Item Tracking." Quality Assurance as well as NRC audit findings were tracked by Nuclear Safety and Compliance via the Action Item Tracking System (AIT). The inspector reviewed a sample of items from the December 1987 exercise and noted that items were assigned to various departments or individuals with a tentative completion date. In some instances, items were completed prior to the assigned completion date.

No violations or deviations were identified.

8. Action on Previous Inspection Findings (92701)

- a. (Closed) IFI 50-321, 366/86-24-01: Failure to include two examples of initiating events for the Notification of Unusual Event (NOUE) classification in the Emergency Plan and Classification Procedures.

The inspector was provided documentation by the licensee which indicated that the above item was reviewed for consistency with NRC

requirements and commitments and resulted in the following: 1) correspondence from the NRC Region II office dated July 5, 1984, granted approval to the Hatch Emergency Plan revision dated October 1983, as meeting the planning standards of 10 CFR 50.47(b) and the requirements of Appendix E to 10 CFR 50; 2) according to the Corporate Office Nuclear Safety and Licensing review, the licensee is not committed to NUREG-0654 and therefore considers NUREG-0654 as recommendation and guidance but not a requirement or commitment.

- b. (Closed) IFI 50-321, 366/87-18-01: Verify and document the Operability of the Civil Defense radio in the TSC. The licensee revised Procedure 63EP-TET-001-OS (Control and Testing of Emergency Communications Equipment) to include monthly testing of the Civil Defense radio. The inspector reviewed documentation for the period January 13, 1988 to August 12, 1988, and noted that monthly operability tests were being conducted. Further, the inspector requested and observed a communications check from the TSC and EOF. No problems were noted.

9. Exit Interview

The inspection scope and findings were summarized on August 19, 1988, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the the inspection findings listed below. In response to the Inspector Followup Items detailed in Paragraph 4 of the report (specific to emergency kit inventory), the Health Physics Superintendent indicated that the oxygen tank was full but improperly labeled due to the fact that the perforated portion which was labeled "full" became separated. The licensee did not identify as proprietary any of the material provided to or reviewed by the inspector during this inspection.

<u>Item Number</u>	<u>Description and Reference</u>
50-321, 366/88-25-01	IFI - Revise Procedure 63EP-TET-001-OS (Control and Testing of Emergency Communication Equipment) to ensure that the appropriate documentation is entered on Attachment 1 to 63EP-TET-001-OS.
50-321, 366/88-25-02	IFI - Upgrade administrative controls and the procedural requirements of 63EP-INS-001-OS to ensure that emergency kits and contents are being maintained current and in an operational state of readiness.