



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

SEP 26 1988

Report Nos.: 50-338/88-24 and 50-339/88-24

Licensee: Virginia Electric and Power Company  
Richmond, VA 23261

Docket Nos.: 50-338 and 50-339

License Nos.: NPF-4 and NPF-7

Facility Name: North Anna Power Station

Inspection Conducted: August 15-19, 1988

Inspector: *E. D. Testa* 9/26/88  
for E. D. Testa Date Signed

Approved by: *T. R. Decker* 9/24/88  
for T. R. Decker, Section Chief Date Signed  
Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine inspection was conducted in the area of emergency preparedness, and included a review of the following programmatic areas: (1) Emergency Plan and Implementing Procedures; (2) emergency facilities, equipment, instrumentation, and supplies; (3) organization and management control; (4) training; and (5) independent reviews/audits.

Results: Two violations were identified: (1) failure to use the most recent revision of the Emergency Personnel Augmentation Telephone Call List; and (2) failure to demonstrate the capability of meeting staffing requirements for emergency response team personnel.

The findings of this inspection appear to indicate a weakness in the notification and emergency response staffing capabilities at the site.

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## REPORT DETAILS

### 1. Persons Contacted

#### Licensee Employees

- \*K. Bridges, Shift Supervisor, Security
- \*E. Dreyer, Supervisor Health Physics
- \*R. Driscoll, Manager, Quality Assurance
- \*S. Harrison, Coordinator - Corporate Emergency Planning
- \*J. Higgins, Director, Nuclear Security
- \*G. Kane, North Anna Power Station, Station Manager
- \*P. Kemp, Licensing Coordinator
- \*K. LeFevre, Sr. Health Physicist (Corporate)
- \*T. Maddy, Supervisor Security
- \*B. McBride, Coordinator - Emergency Planning
- D. Ross, Sr. Health Physicist Staff
- R. Rodgers, Shift Supervisor
- \*D. Vanderwalle, Supervisor, Licensing

Other licensee employees contacted during this inspection included engineers, operators, mechanics, security force members, technicians, and administrative personnel.

#### Other Organizations

- A. Baskerville, Coordinator of Emergency Services, Orange County
- M. Harman, Coordinator of Emergency Services, Hanover County
- R. Scott, Emergency Coordinator, Spotsylvania County

#### Nuclear Regulatory Commission

- \*H. Bermudez, Radiation Specialist
- \*J. Caldwell, Senior Resident Inspector
- \*J. Kahle, Chief, Radiological Effluents and Chemistry Section

\*Attended exit interview

### 2. Licensee Action on Previous Enforcement Matters

This subject was not addressed during this inspection

### 3. Emergency Plan and Implementing Procedure (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), Appendix E to 10 CFR Part 50, and Section 8 of the licensee's Emergency Plan, this area was inspected to determine whether significant changes had been made in the licensee's emergency preparedness program during the past year, and to

assess the impact of any such changes on the overall state of emergency preparedness at the facility.

The inspector reviewed the licensee's systems for making changes to the Emergency Plan and the Emergency Plan Implementing Procedures (EPIPs). By a selective review, the inspector verified that the licensee's management approved revisions to the Emergency Plan and the EPIPs issued since June 1, 1987. Controlled copies of the Emergency Plan and EPIPs were examined in the Technical Support Center (TSC) and Local Emergency Operations Facility (LEOF) and found to contain the correct revision.

The inspector reviewed the licensee's agreement letters with the following offsite agencies and found them current.

- County of Louisa
- Louisa Volunteer Fire Company
- Louisa County Sheriff
- Louisa County Rescue Squad, Inc.
- Mineral Volunteer Fire Department
- Spotsylvania County Sheriff
- Spotsylvania Fire Department
- Spotsylvania Office of Emergency Services
- Orange County Sheriff's Department
- Orange County Board of Supervisors
- Hanover County Sheriff
- Hanover County
- Caroline County Office of Emergency Services

No violations or deviations were identified.

#### 1. Emergency Facilities, Equipment, Instrumentation, and Supplies (82701)

Pursuant to 10 CFR 50.47(b)(8) and (9), 10 CFR 50.54(q), and Section IV.E of Appendix E to 10 CFR Part 50, this area was inspected to determine whether the licensee's emergency response facilities and other essential emergency equipment, instrumentation, and supplies were maintained in a state of operational readiness, and to assess the impact of any change in this area upon the emergency preparedness program.

The inspector selectively examined emergency supplies and equipment in the Control Room, TSC, Operational Support Center (OSC), Alternate Operational Support Center, LEOF, current Corporate Emergency Response Center (CERC), planned future Corporate Emergency Response Center and Local Media Center.

The current CERC located at 1 James River Plaza Office Building will be relocated on or about September 16, 1988, to the Innsbrook Technical Center. A floor plan of the future CERC was reviewed.

The Local Media Center was relocated during this past year from the Mineral Fire Hall to a newly constructed facility onsite. The new facility also houses the Information Center. No problems were identified.

The inspector selectively reviewed Periodic Test (1-PT-114) Emergency Kit Inspection for the period January 19, 1988 to July 18, 1988, and found no problems. Procedure 1-PT-38.1.4, Ventilation Vent "A" Off Line Radio Gas Monitor (VG-104) Functional test records were selectively reviewed for the period January 21, 1988 to July 27, 1988, and no problems were found.

The following Control Room Meteorological Instruments were verified to be operational during a tour of the Control Room.

TR-MM-100A	10 meter Temperature
TR-MM-100B	Delta Temperature
ST-MM-100	Sigma Theta
SR-MM-101A	Wind Speed
SR-MM-101B	10 meter Wind Speed
ZR-MM-101A	30 meter Wind Direction
ZR-MM-101B	10 meter Wind Direction
ZR-MM-101C	Backup Wind Direction

The inspector selectively reviewed the Alert and Notification System test results for Louisa and Spotsylvania Counties for the period January 1987 thru August 1988. The results of the growl test conducted monthly using procedure SNS-EWS-01 and the full-cycle test conducted quarterly using procedure 1-PT-172.2 indicated an acceptable level of siren availability.

No violations or deviations were identified.

#### 5. Organization and Management Control (82701)

Pursuant to 10 CFR 50.47(b) (1) and (16) and Section IV.A of Appendix E to 10 CFR Part 50, the area was inspected to determine the effects of changes in the licensee's emergency response organization and/or management control systems of the emergency preparedness program, and to verify that such changes were properly factored into the Emergency Plan Implementing Procedures.

The organization and management of the emergency preparedness program were reviewed and discussed with a licensee representative. The licensee stated that two offsite emergency planners, one in Spotsylvania County and the other in Hanover County, were new since the last inspection. Discussions with the Spotsylvania County Emergency Coordinator, Orange County Coordinator of Emergency Services and Hanover County Coordinator of Emergency Services indicated that a satisfactory relationship existed between the licensee and the counties. The licensee reviewed the organizational changes in the corporate organization with the inspector. None of the changes appear to reduce the effectivenesses of emergency support to the site. Changes at the site include a new station manager and a new emergency planner. The new station manager was promoted from the site organization and was already familiar with the site emergency plan and had been previously assigned emergency response activities. The new emergency planner assumed his duties in January 1988. The previous

planner accepted a position in the Corporate Office Emergency Planning organization. Continuity of the site emergency planning activities appear to be satisfactory since the previous planner was made available to support the site during the transition. The previous planner continues to assist the site.

No violations or deviations were identified

#### 6. Training (82701)

Pursuant to 10 CFR 50.47(b)(2) and (15), Section IV.F of Appendix E to 10 CFR Part 50, and Section 8 of the Emergency Plan, this area was inspected to determine whether the licensee's key emergency response personnel were properly trained and understood their emergency responsibilities.

The inspector conducted an interview in the LEOF with a Shift Supervisor undergoing requalification training. The Shift Supervisor was given several sets of hypothetical emergency conditions and plant data and was asked in each case to talk through the response he would provide as Interim Station Emergency Manager if such an emergency actually existed. The individual was able to correctly classify event situations and provide Protective Action Recommendation as appropriate. The individual exhibited a working knowledge of the Emergency Plan and EIPs. No problems were observed.

The inspector selectively reviewed the training records of individuals designated as Station Emergency Manager. No problems were found.

The inspector witnessed an unannounced North Anna Power Station Emergency Response Personnel Call Out Drill using procedure 1-EP-MISC-1 dated June 30, 1988. The drill was initiated at about 7:05 p.m. on August 17, 1988. By procedure, EPIP 3.01 titled, Callout of Emergency Response Personnel, Security Obtained Section 1.2 of the North Anna Power Station Telephone Directory. The inspector determined that the two call lists which were to be used were outdated revisions of the call list. The most recent revision of the call list contained at least 5 changes from the call list used. One change involved a revised home telephone number. The use of the outdated call list was identified to the licensee as a violation.

Violation (50-338, 339/88-24-01): Failure to use the most recent revision of the Emergency Personnel Augmentation Telephone Call List.

The inspector observed the callout and compared the results with the commitments in Table 5.1 Titled Minimum Staffing Requirements for Emergencies. The inspector found that 5 of 11 major functional area personnel could not respond in the 30 minute commitment. Primary and alternate Personnel in the Plant System Engineering Repair and Corrective Actions Functional area could not be contacted by telephone and thus did not respond. Notification telephone calls to four other emergency response personnel took in excess of the 30 minute commitment. A second

unannounced drill conducted at about 10:30 pm the next evening (August 18, 1988), failed to demonstrate the augmentation capability. The failure to demonstrate timely augmentation was identified to the licensee as a violation.

Violation (50-338, 339/88-24-02): Failure to demonstrate the capability of meeting staffing requirements for emergency response team personnel.

Two violations were identified.

#### 7. Independent Review/Audits (82701)

Pursuant to 10 CFR 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, and whether the licensee had a corrective action system for deficiencies and weaknesses identified.

The inspector selectively reviewed records of the emergency preparedness program audit. An independent audit was conducted by the licensee's Quality Assurance Group and was completed June 10, 1988. The findings of the audit were documented in Audit Report N-88-02. Thirteen (13) findings and eight Items of Concern were identified. Final response to the findings had not been completed. These responses will be reviewed during a future inspection.

The inspector reviewed records associated with the review of the Emergency Action Levels (EALs) by the Commonwealth of Virginia and the local county's emergency planners. The review took place during a quarterly meeting at the North Anna Information Center on March 17, 1988. No problems were identified.

The inspector reviewed records associated with the preparation of the 1988 and 1989 Emergency Information Calendar and Emergency Information and found no problems.

The inspector reviewed the Exercise Critique for the June 28, 1988, North Anna Power Station full scale exercise and noted that the identified items for improvement were placed on the commitment tracking systems with commitment dates and responsibility for action assigned. The closeout of these items will be reviewed during a future inspection. No problems were identified.

During a review of the records for the February 5, 1988 Health Physics Drill, the inspector determined that neither observer/evaluator comments nor the Drill Critique discussed whether the drill objectives had been met. The absence of a definitive statement on meeting drill objectives and an action plan to correct objectives not met was identified as an Inspector Followup Item (IFI).

IFI (50-338,339/88-24-03): Incorporate a statement in the Drill Critique Report addressing whether drill objectives were or were not met and develop action items to correct those objectives not met.

No violations or deviations were identified

#### 8. Exit Interview

The inspection scope and results were summarized on August 19, 1988, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. The inspector received two memoranda dated August 18, 1988, at the exit. One memorandum from the Station Manager to the Security Supervisor addressed Reproduction and Storage of Controlled Documents and Administrative Procedure 6.4 titled, Controlled Document Holders Responsibility. The second memorandum from the Station Manager to file addressed an Action Plan to Prevent Inadequate Implementation of the Emergency Planning Callout Procedure. Actions outlined in the memoranda will be reviewed during future inspections. Although reviewed during this inspection, proprietary information is not contained in this report. Dissenting comments were not received from the licensee.

<u>Item Number</u>	<u>Description and Reference</u>
50-338,339/88-24-01	Violation - Failure to use the most recent revision of the Emergency Personnel Augmentation Telephone Call Lists, Paragraph 6.
50-338,339/88-24-02	Violation - Failure to demonstrate the capability of meeting staffing requirements for emergency team personnel, Paragraph 6.
50-338,339/88-24-03	Inspector Followup Item - Incorporate a statement in the Drill Critique Report addressing whether Drill Objectives were or were not met and develop action items to correct those objectives not met, Paragraph 7.