

APPENDIX A

U.S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-458/88-21

Operating License: NPF-47

Docket: 50-458

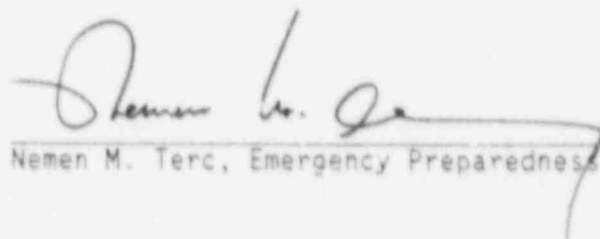
Licensee: Gulf States Utilities
P.O. Box 220
St. Francisville, Louisiana 70775

Facility Name: River Bend Station (RBS)

Inspection At: RBS, St. Francisville, Louisiana


Inspection Conducted: September 12-15, 1988

Inspector:


Nemen M. Terc, Emergency Preparedness Specialist

9/30/88
Date

Approved:


R. J. Everett, Chief, Security and Emergency
Preparedness Section

10/3/88
Date

Inspection Summary

Inspection Conducted September 12-15, 1988 (Report 50-458/88-21)

Areas Inspected: Routine, announced inspection of the operational status of the emergency preparedness program.

Results: Within the areas inspected, no violations or deviations were identified.

DETAILS1. Persons ContactedRBS

- *P. Graham, Assistant Plant Manager
- *M. Sankovich, Manager, Engineering Department
- *D. Andrews, Director, Nuclear Training
- *J. Cadwallader, Supervisor, Emergency Planning
- *T. Crouse, Manager, Quality Assurance
- *W. Odell, Manager, Administration
- *T. Fredieu, Supervisor, Operations
- *L. Johnson, Manager, Technical Operations
- *R. Horn, Technical Nuclear Training Coordinator
- *L. England, Director, Nuclear Licensing
- *G. Kimmell, Director, Quality Services

*Denotes those present at exit interview.

The NRC inspector also held discussions with other station and corporate personnel in the areas of security, health physics, operations, training, and emergency response.

2. Followup on Previous Inspection Findings (92701)

(Closed) Violation (458/8730-01) Inadequate Training - The NRC inspector determined that retraining of key emergency response operations personnel had been completed, and their understanding of emergency preparedness concepts had attained adequate levels.

3. Emergency Plan and Implementing Procedures (82701-02.01)

The NRC inspector reviewed the licensee's Emergency Plan and Emergency Plan Implementing Procedures, and noted that no changes to the plan had been made since the last inspection. Changes to procedures were submitted in accordance with the requirements of 10 CFR 50, Appendix E. Changes to Procedures EIP-2-006, "Notifications," and EIP-2-005, "General Emergency," were submitted to the NRC within the required deadlines. Changes were also noted in other station procedures as necessary for consistency. These procedures were distributed to users on a timely basis using established mechanisms for document control.

No violations or deviations were identified in this area.

4. Emergency Facilities, Equipment, Instrumentation and Supplies
(82701-02.02)

The NRC inspector toured the Emergency Response Facilities (ERFs); held discussions with the emergency preparedness staff; and examined inventories to determine if equipment, instrumentation, and supplies were maintained in a state of operational readiness.

No violations or deviations were identified in this area.

5. Organization and Management Control (82701-02.03)

The NRC inspector interviewed licensee management and reviewed a memorandum dated August 23, 1988, entitled "Emergency Response Organization," which listed persons qualified to occupy the different positions in the emergency response organization in the event of an accident. In addition, the same document specified additional personnel that had been selected to occupy various positions in the emergency response organization in the near future, and established qualification criteria and training requirements for these positions. This memorandum has a wide distribution and maintains management and cognizant personnel awareness of any personnel changes that may impact their emergency response organization.

The NRC inspector noted that a new person was appointed to the emergency preparedness staff as an assistant to the lead emergency planner. The NRC inspector determined that a training program had been established to qualify this new staff member including the observation of exercises at other facilities.

The NRC inspector reviewed the Letters of Agreement between the licensee and offsite support groups and noted that these letters were current. In addition, the NRC inspector noted that emergency action levels had been discussed with state and parish officials as required by 10 CFR 50, Appendix E, paragraph IV.B.

No violations or deviations were identified in this area.

6. Training (82701-02.04)

The NRC inspector reviewed the licensee's training records, vendor proposals, and reports. As a result, the NRC inspector noted that:

- ° Retraining of key emergency response operations personnel was completed by March 2, 1988, using a newly developed lesson plan (SP-093-0) specifically designed to enhance conceptual knowledge needed by key emergency response personnel.
- ° Some of the weaknesses in the performance of emergency responders in the past was partly due to the fact that the emergency planning staff had no direct participation in the training of emergency responders. The emergency planning staff now has a direct role in preparing, conducting and testing emergency response personnel.

- ° A consultant was hired to perform an independent evaluation of the emergency response training program. The consultant issued a report on February 25, 1988, making 35 observations and recommendations for further improvements.
- ° Another consultant-vendor group is presently engaged in a comprehensive revision of the licensee's emergency response organization training program.

The NRC inspector conducted interviews with four teams consisting of Emergency Coordinators as defined in NUREG 0654. At RBS the Emergency Coordinators are designated as Shift Supervisors, Emergency Directors, and Recovery Managers, depending on the level of augmentation of the emergency response organization. The teams were constituted as follows:

- ° Each of the first two teams consisted of one Shift Supervisor and one Control Operations Foreman (COF) (The COFs have notification and dose assessment responsibilities).
- ° The third team consisted of a Recovery Manager and a Radiological Assessment Coordinator.
- ° The fourth team consisted of one Emergency Director, a Technical Support Center Manager, a Radiation Protection Supervisor, and a Radiological Assessment Coordinator.

The interviewees were presented with 11 conceptual questions pertaining to their immediate emergency response duties and responsibilities. In addition, each team examined was presented with a walkthrough entailing a hypothetical accident scenario for the purpose of testing their accuracy in classifying emergencies, making adequate and timely notifications and protective action recommendations. The interviews were performed in the Control Room, in the Technical Support Center, and in the Emergency Operations Facility. These locations allowed realistic conditions for the personnel interviewed. All necessary reference materials were available. Each interview lasted 90 minutes. The same questions and accident scenario were used for every team. Representatives from the licensee's training, emergency preparedness, and operations staffs were present during each of the interviews.

Based upon the above, the NRC inspector made the following findings:

° Knowledge of Duties and Responsibilities

All teams demonstrated an adequate overall knowledge of their duties and responsibilities in event of emergency plan activation and responded accurately and readily to conceptual questions pertaining to their duties and responsibilities during emergency conditions. However, one team was unsure at first as to the proper offsite

consequence due to a longer release duration. This was corrected during the interview.

- ° Accident Detection

All teams were able to promptly recognize accident conditions postulated by the accident scenario and implement mitigation strategies in accordance with emergency operating procedures. The Recovery Manager erroneously believed that grab stack samples could be taken and analyzed in less than 20 minutes. This misconception was corrected during the interview.

- ° Accident Classification

All teams were able to properly classify plant conditions into the proper emergency classification.

- ° Accident Notifications

All teams were able to initiate and complete the proper notification forms in response to an emergency declaration by the Emergency Coordinator.

- ° Dose Assessment

The NRC inspector provided each team with the data necessary to perform dose calculations. All teams were able to obtain the correct dose projections.

- ° Protection Action Recommendation (PAR) Formulation

All teams performed well when requested to formulate a PAR for the postulated general emergency conditions and write the PAR as though they were making the entry on the appropriate message form.

No violations or deviations were identified in this area.

7. Independent Audits (82701-02.05)

The NRC inspector noted that independent, annual audits had been conducted by the Quality Assurance Department as required by 10 CFR 50.54(t) for 1987 and 1988. The report for the most recent audit, issued on September 2, 1988, identified seven items requiring corrective actions and assigned responsibilities for carrying out corrective actions. The report also required a written response for each item and a response deadline. In addition, the NRC inspector noted that a tracking system was in place to ensure that corrective actions would be taken.

The NRC inspector determined that the licensee had conducted an appropriate number of emergency drills. In addition, the NRC inspector noted that deficiencies identified in these drills were subject to a

corrective action tracking system to meet the intent of 10 CFR 50.47(b)(14), which requires that the licensee correct deficiencies identified during exercises or drills.

No violations or deviations were identified in this area.

9. Exit Interview

The NRC inspector met with licensee representatives in paragraph 1 above on September 14, 1988, and summarized the scope and findings of the inspection as presented in this report. Licensee representatives acknowledged their understanding of the inspection findings.

ATTACHMENT 2

UPDATE FORM

FACILITY: River Bend Station
DOCKET: 50-458

ORIGINATORS NAME: T E R C []

TYPE: Y

ITEM NO.: 8 7 3 0 - 0 1 [] [] [] []

REPORT: 8 7 - 3 0 [] []

PARAGRAPH: 4 [] [] []

FUNCTIONAL AREA: E M E R G E N C Y [] P R E P A R E D N E

DESCRIPTION: I N A D E Q U A T E T R A I N I N G []
O F [] P E R S O N N E L [] [] [] [] [] [] [] [] [] []
[] [] [] [] [] [] [] [] [] [] [] [] [] [] [] [] [] [] [] []

STATUS CODE: C

UPDATE/CLOSE: REPORT 8 8 - 2 1 []

RESPONSIBLE SECTION: S E P 3 [] [] [] [] [] [] [] []

DETAILS: _____

