



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

MAR 20 1986

Report Nos.: 50-338/86-05 and 50-339/86-05

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: February 24-28, 1986

Inspectors: J. R. Nickle for 3/16/86  
J. L. Kreh Date Signed

Accompanying Personnel: A. E. Tabaka

Approved by: J. R. Nickle 3/16/86  
T. R. Decker, Chief Date Signed  
Division of Radiation Safety and Safeguards

SUMMARY

Scope: This routine, unannounced inspection involved 64 inspector-hours onsite and 4 inspector-hours offsite in the area of emergency preparedness.

Results: One violation was identified: failure to provide a specialized training program for personnel assigned to Damage Control Teams. No deviations were identified.

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## REPORT DETAILS

## 1. Persons Contacted

## Licensee Employees

\*E. W. Harrell, Station Manager  
 \*E. R. Smith, Jr., Assistant Station Manager  
 \*L. L. Edmonds, Superintendent Nuclear Training  
 \*G. E. Pederson, Supervisor Training  
 \*S. A. Harrison, Coordinator Emergency Planning (Station)  
 \*G. A. Polson, Coordinator Emergency Planning (Corporate)  
 \*F. M. Cox, Supervisor Emergency Planning (Corporate)  
 G. J. Mocarski, Loss Prevention Supervisor  
 S. Black, Station Safety Coordinator  
 J. C. Lencalis, Shift Supervisor  
 R. C. Sturgill, Assistant Shift Supervisor  
 W. R. Madison, Senior Instructor

Other licensee employees contacted included technicians, operators, mechanics, security force members, and office personnel.

## Other Organizations

R. F. Perkins, Jr., Chief, Louisa (VA) Volunteer Fire Department  
 M. A. Manrique, Assistant Coordinator of Emergency Services, Louisa County, VA

## NRC Resident Inspectors

\*M. W. Branch  
 L. P. King

\*Attended exit interview

## 2. Exit Interview

The inspection scope and findings were summarized on February 28, 1986, with those persons indicated in Paragraph 1 above. The inspector described the areas inspected and discussed in detail the violation described below in Paragraph 5 (failure to provide specialized emergency training for personnel assigned to Damage Control Teams). Although station management representatives did not explicitly take exception to this finding, they indicated that further evaluation would be undertaken.

The licensee did not identify as proprietary any of the materials provided to or reviewed by the inspectors during this inspection.

### 3. Emergency Detection and Classification (82201)

Pursuant to 10 CFR 50.47(b)(4) and 10 CFR Part 50, Appendix E, Sections IV.B and IV.C, this program area was inspected to determine whether the licensee used and understood a standard emergency classification and action level scheme.

The inspector reviewed Emergency Plan Implementing Procedure (EPIP)-1.01, "Emergency Manager Controlling Procedure," to determine the adequacy of the licensee's classification scheme. Although the procedure was lengthy and relatively cumbersome, interviews with Shift Supervisors (see paragraph 5 below) confirmed its efficacy. The indications associated with the various conditions listed in the Emergency Action Level (EAL) Table (Attachment 1 to EPIP-1.01) were generally keyed to the values of specific plant parameters obtainable from Control Room instrumentation. The EALs appeared to be consistent with the initiating events delineated in Appendix 1 to NUREG-0654, Revision 1.

The inspector discussed with licensee representatives the coordination of EALs with State and local officials, and noted documentation of the licensee's annual review of EALs with representatives of State and local agencies in a meeting on March 27, 1985.

No violations or deviations were identified.

### 4. Changes to the Emergency Preparedness Program (82204)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and 10 CFR Part 50, Appendix E, Sections IV and V, this area was reviewed to determine whether changes were made to the program since the last routine inspection (March 1985) and to note how any such changes affected the overall state of emergency preparedness.

The inspector verified, through discussions with licensee personnel and examination of records, that station management representatives reviewed and approved changes to the Emergency Plan (EP) and the EPIPs through the functioning of the Station Nuclear Safety and Operations Committee (SNSOC). The inspector verified that EP/EPIP revisions during the period January 1985, through January 1986, were submitted to the NRC within 30 days of implementation and that they were distributed to appropriate station personnel.

The licensee's most recent EP revision was dated March 5, 1985 (Revision 9); NRC review previously confirmed that Revision 9 had not decreased the effectiveness of the EP.

Significant changes in the licensee's emergency response facilities included turnover of the new Technical Support Center (TSC) and Local Emergency Operations Facility (LEOF). The TSC, adjacent to the Control Room, and the LEOF, adjunctive to the Training Building, were examined briefly by the inspector. Provisions for activation and use of these facilities were

incorporated in the EIPs. Revised descriptions of the TSC and LEOF were to be included in the next EP revision (in progress, according to the licensee). Other changes included refurbishment of the Local Media Center in Mineral, VA, to improve general habitability and communications capability. These changes in the licensee's emergency response facilities increased the effectiveness of the emergency preparedness program.

The inspector reviewed the licensee's organization for administration of the emergency preparedness program. The departure of the corporate Director Emergency Planning resulted in downgrading of the position to that of Supervisor, although the organization of the program was unaffected. The individual serving as corporate Supervisor Emergency Planning was formerly Coordinator Emergency Planning for the Surry Power Station. There were no changes in the organization of the program at the station level. The emergency preparedness program at North Anna had good visibility and appeared to be receiving adequate attention from station management. Significant changes in the staffing of offsite support agencies included reassignments for the positions of Louisa County Emergency Coordinator, Caroline County Emergency Coordinator, and Coordinator of Emergency Services for the Commonwealth of Virginia.

No violations or deviations were identified.

#### 5. Knowledge and Performance of Duties (Training) (82206)

Pursuant to 10 CFR 50.47(b)(15) and Section IV of Appendix E to 10 CFR Part 50, this area was inspected to determine the extent to which emergency response personnel understood their roles and were capable of performing their assigned functions.

The inspector examined selected lesson plans and training records, and interviewed members of the instructional staff. The training program as defined in EP Section 8.3 was found to be fully implemented. Lesson plans were thorough and detailed. Training records were up to date and readily auditable; several minor discrepancies were identified to the licensee and promptly resolved. Training records for key members of the emergency organization for the period March 1985 - January 1986, indicated that the type, amount, and frequency of emergency preparedness training were consistent with EP requirements.

Although the EP/EIPs identified the existence and functional role of the Damage Control Team in the emergency response organization, the EP did not describe a specialized initial training and periodic retraining program for personnel assigned to the Damage Control Team, as required by regulation. Further, licensee representatives were unable to identify the provision of specialized emergency training for the personnel in question at any phase of their normal employment training. The inspector informed the licensee that the EP failed to comply with the requirements of Section IV.F of Appendix E to 10 CFR Part 50.

Violation (338,339/86-05-01): Failure to provide specialized emergency training for members of the Damage Control Team.

The inspector conducted walk-through interviews with 2 persons identified in the emergency organization as (interim) Station Emergency Manager (SEM). During these walk-throughs, the individuals were given various hypothetical sets of emergency conditions and data and asked to discuss what actions they would take in accordance with the EP/EIPs. The individuals demonstrated reasonable facility and familiarity with the procedures, and no significant problems were observed in the areas of emergency detection/classification and protective action decision-making.

As part of one of the walk-throughs described above, the inspector interviewed an individual designated by the mock SEM as Emergency Communicator. That individual demonstrated familiarity with EPIP-2.01, "Notification of State and Local Governments", and EPIP-2.02, "Notification of NRC." In addition, the individual in question stated that she had received formal training for the role of Emergency Communicator, and had served in that capacity during several actual emergencies (Notification of Unusual Event classification). Lessons plans and training records for the Emergency Communicator function were reviewed. In connection with this matter, the inspector discussed with licensee representatives IE information Notice No. 85-80, "Timely Declaration of an Emergency Class, Implementation of an Emergency Plan, and Emergency Notifications." The licensee had reviewed this Notice and had determined that no action was necessary, since formal training for the Emergency Communicator position was already being given. The inspector had no further questions on this matter.

One violation and no deviations were identified.

#### 6. Licensee Audits (82210)

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.

Records of audits of the program were reviewed. The records showed that an independent audit of the program (Audit No. N-85-03) was conducted by the licensee's Quality Assurance Department, with findings contained in a report dated May 10, 1985. This audit fulfilled the 12-month frequency requirement for such audits. The audit records showed that the State and local government interfaces were evaluated. Audit findings and recommendations were presented to station and corporate management. A review of station records indicated that the licensee complied with the five-year retention requirement for audit reports.

Licensee emergency plans and procedures required critiques following exercises, and an evaluation process following drills. Licensee documentation showed that these requirements were followed, resulting in identification of deficiencies and recommendations for corrective action.



The licensee's program for follow-up action on audit, drill, and exercise findings was reviewed, as were records which indicated that corrective action was taken on identified problems, as appropriate. The licensee had established a computerized tracking system as a management tool in following up on actions taken in deficient areas.

No violations or deviations were identified in this program area.

7. Coordination with Offsite Agencies (82210)

The inspector held discussions with licensee representatives regarding the coordination of emergency planning with offsite agencies. Written agreements existed with those offsite support agencies specified in the EP, with the required 2-year renewal of those agreements in progress. The inspector determined through personal interviews with representatives of selected local support agencies that the licensee was periodically contacting those agencies for purposes of offering training and maintaining mutual familiarization with emergency response roles. Those interviews disclosed no significant problems related to the interfaces between the licensee and the offsite support agencies listed in Paragraph 1.

8. Inspector Follow-up (92701)

(Closed) Inspector Follow-up Item (IFI) 338,339/85-21-01: EPIP-1.01 was revised to eliminate 8 separate EAL references to declaration of a Notification of Unusual Event only upon attainment of Mode 3 (i.e., declaration was formerly not required while unit in Mode 1 or 2).