

U. S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-373/89004(DRSS); 50-374/89004(DRSS)

Docket Nos. 50-373; 50-374

Licenses No. NPF-11; NPF-18

Licensee: Commonwealth Edison Company  
Post Office Box 767  
Chicago, IL 60690

Facility Name: LaSalle County Nuclear Generating Station, Units 1 and 2

Inspection At: LaSalle site, Seneca, Illinois

Inspection Conducted: February 27 through March 2, 1989

Inspectors: *Marcia J. Smith*  
M. Smith

3/20/89  
Date

*J. Patterson*  
J. Patterson

3/20/89  
Date

Approved By: *William Snell*  
W. Snell, Chief  
Emergency Preparedness and  
Effluents Section

3/21/89  
Date

Inspection Summary

Inspection on February 27 through March 2, 1989 (Reports No. 50-373/89004(DRSS); 50-374/89004(DRSS))

Areas Inspected: Routine, unannounced inspection of the following aspects of the LaSalle Station's emergency preparedness program: licensee actions on previously identified items (IP 92701); emergency plan activations (IP 92700); operational status of the program (IP 82701); training (IP 82206), and dose assessment (IP 82207). Section 6 of this report provides an updated summary of the status of all emergency preparedness related TMI (SIMS) items. The inspection involved two NRC inspectors.

Results: No violations of NRC requirements, deficiencies, or deviations were identified as a result of the inspection. Corrective actions for six open items were reviewed and determined to be adequate. The operational status of the program remains well maintained and the overall management of the plant program is strong. Audit findings and NRC concerns were adequately tracked and received timely resolution. The onsite emergency organization received strong plant management and corporate office support.

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## DETAILS

### 1. Persons Contacted

G. Diederich, LaSalle Station Manager  
W. Huntington, Services Superintendent  
P. Manning, Asst. Supt. Technical Services  
R. Carson, Emergency Planning Supervisor  
L. Aldrich, Rad/Chem Supervisor  
T. Hammerich, Regulatory Assurance Supervisor  
J. Roman, IDNS Resident Engineer  
K. Klotz, GSEP Coordinator  
T. Shaffer, Training Supervisor  
W. Betourne, QA Supervisor

The above persons attended the March 2, 1989, exit interview.

### 2. Licensee Action on Previously Identified Items (IP 92701)

(Closed) Item No. 373/84018-01 and 374/84024-01: The licensee must provide procedural guidance regarding formulation and documentation of adequately detailed followup messages to offsite authorities per a commitment in Section 6.1 of the GSEP.

Implementing Procedure NST-E0F-3, Nuclear Services Technical Emergency Operations Facilities, places responsibility for timely followup messages to offsite authorities on the Environmental Emergency Coordinator. Appendix F to this procedure is implemented to update State Agencies at least hourly. This procedure has been successfully demonstrated at the Mazon EOF during exercises involving various Commonwealth Edison Nuclear Generating Stations. This item is closed.

(Closed) Open Item No. 373/84018-04 and 374/84024-04: The overall performance of the Technical Spokespersons in the Joint Public Information Center was poor and press releases were inadequately detailed. This open item became a violation in Inspection Report No. 50-373/85011-01. Performance in the JPIC was evaluated and the open item was closed in Inspection Report No. 50-373/86001 and 50-374/86001. This item is closed.

(Closed) Open Item No. 50-373/87900-01 and 50-374/87900-01: This open item was issued as a followup on Information Notice 87-58 which addressed licensee's capability to provide continuous communications with the NRC following an emergency notification. Procedure LZP-1301-1 directs the Station Director to ensure continuous communications with NRC upon their request. This item is closed.

3. Emergency Plan Activations (92700)

Licensee and NRC records associated with all Emergency Plan activations were reviewed for the period of January 1988 through the date of this inspection. Records included Licensee Event Reports (LERs), reports prepared by NRC duty officers, and evaluation files maintained by the GSEP Coordinator which were complete and well organized. Events were well documented and evaluations were complete.

The five Unusual Events were correctly classified by onsite personnel. Records indicated that State, County and NRC officials had been notified within regulatory time limits following each declaration. Based on an in-office review of LERs, there were no other incidents during the above time period that required an activation of the GSEP.

Based on the above findings, this portion of the licensee's program was acceptable.

4. Operational Status of the Emergency Preparedness Program (82701)

a. Emergency Plan and Implementing Procedures

A review was conducted of licensee procedures for the preparation, review and distribution of new and revised implementing procedures to assure that the requirements of 10 CFR 50.54(q) and Appendix E Paragraph V of 10 CFR 50 were implemented. A review of the distribution of 12 (LZP series) procedures from various dates in this inspection period was conducted. All procedures were distributed with 30 days of the change.

Changes to the emergency response program and implementing procedures were reviewed according to procedures and did not impact negatively on the overall state of onsite and offsite emergency preparedness. These program changes were appropriately reflected in related station procedures.

Current copies of the GSEP, LaSalle Annex and LZP procedures were readily available in the Technical Support Center (TSC) and Operational Support Center (OSC).

Based on the above findings, this portion of the licensee's program was acceptable.

b. Emergency Facilities, Equipment, Instrumentation and Supplies

Following discussions with the GSEP Coordinator and a tour of the TSC and OSC, and two onsite assembly areas, it was determined that no changes had been made to these facilities since the previous inspection. All areas were maintained in an adequate state of readiness based on general appearance and inventories of emergency supplies, records, and storage locations.

The licensee has added the "A" model computer program which utilizes on line real time data from radiation and meteorology parameters as specified in the Emergency Action Levels (EALs). Information from this program is available to the Control Room automatically and can be obtained by anyone with PRIME program capabilities. This program is also available in the TSC and Emergency Operations Facility (EOF). Plant procedures were changed to reflect the addition of this assessment capability.

A random inventory of TSC and OSC supply cabinets was conducted. No discrepancies were identified from posted current inventory records. Records reviewed indicated all required inventories were conducted and adequately documented. Records indicated that missing items were replaced in a timely manner. The 1988 periodic surveillance records were complete and encompassed monthly communications equipment tests, quarterly check of Health Physics equipment and other necessary supplies and forms.

Based on the above findings, this portion of the licensee's program is acceptable.

c. Organizational and Management Control

A review of the plant staff organizational structure indicated no changes were made that would affect the ability of plant personnel to protect the health and safety of the public. The GSEP Coordinator reported to the Services Superintendent through the Rad Chem Supervisor. His responsibilities still include conducting communication tests of equipment located in onsite ERFs, reviews and approval of lesson plans, review and updating of LaSalle annex to the GSEP and its implementing procedures, and maintenance of the Stations' Emergency response program.

In addition to his GSEP Coordinator responsibilities, he was also responsible for ensuring that High Range Sampling System (HRSS) surveillances were conducted, and maintaining the environmental monitoring program, the effluent reporting program, and the routine offsite dose calculation program.

All of the Coordinator's responsibilities are tracked on the Action Item Record (AIR) system managed by the Tech Support Staff. A weekly printout of items due for completion were sent to each department head for assignment. When action items were completed, the department head and the Tech Staff Supervisor reviewed the action taken on each item prior to closing the item on the AIR system. The tracking system automatically assigned the next due date for periodic items. The Coordinator's responsibilities were closely monitored by Tech Staff personnel and were an integral part of the Station's normal operating procedures.

Corporate Emergency Planning personnel had started a training program for all onsite GSEP Training Coordinators. These training sessions are conducted quarterly leading to licensee certification as a GSEP trainer.

Copies of Letters of Agreement with offsite support organizations were reviewed. LaSalle County Station agreements had been updated in 1988 and all letters were complete and current. Each letter of agreement contained an offer to conduct a familiarization visit for offsite support groups.

Based on the above findings, this portion of the licensee's program was acceptable.

d. Emergency Preparedness Training (also IP 82206)

The current GSEP onsite training program was reviewed with the GSEP Training Coordinator and the GSEP Coordinator with emphasis on program changes and improvements, lesson plans, training records, and the incorporation of emergency response program improvements resulting from program audits and exercise/drill critiques.

The inspectors reviewed the lesson plans and course outline for several training modules and found them to be acceptable. The matrix of training requirements was also found to be acceptable and included proper authorization from management. In addition, 21 names were selected at random to verify that these individuals with emergency response positions had received their required annual GSEP training.

Documentation for inclusion in the training courses of any critique findings from drills or exercises that would improve the GSEP onsite program is being accomplished. This is done through three mechanisms:

- (1) The Action Item Record System (AIRS) which tracks the item by individual identification.
- (2) The Rad/Chem Improvement Plan which is less formal than the AIRS method, but does record the item or area of concern with a projected completion date and actual completion date.
- (3) A non-written method which gets the item into the training session through contact between the GSEP Coordinator and the GSEP Training Coordinator. An example of this was an agreement to emphasize more timely posting of emergency related information on the status boards in the OSC.

A GSEP pilot onsite training program for ERO personnel has been initiated for 1989. The pilot program includes offering training monthly that is then repeated on a quarterly cycle. The Assistant

Superintendent of Support Services will be actively involved in this program through his participation in the selection of training topics. Tabletop drills will be included in this quarterly cycle with participation in the station's annual exercise credited as training for the EP responders. ERO directors will be required to sign up for the training at the beginning of each quarter.

Records of 1988 emergency preparedness drills and the internal evaluation of the 1988 exercise were reviewed. All 1988 health physics, medical, post-accident sampling, shift augmentation and assembly drill requirements were conducted successfully. Drill records were complete and indicated that critiques were conducted and performance was evaluated. Selected critique items were added to the licensee's action item tracking system.

Successful interviews were conducted with one Control Room Crew, two TSC Directors, two Rad/Chem Directors, three Operational Support Center Directors, and two Station Environs Directors. All personnel interviewed were knowledgeable of procedures, plant conditions, Emergency Action Levels, and where relevant, demonstrated the ability to recommend Protective Action Recommendations by activating the computer systems and also using the backup flow chart system.

Based on the above findings, this portion of the licensee's program was acceptable.

e. Independent Reviews/Audits (Also 82210)

Records of the Quality Assurance (QA) Department audits and surveillance in 1988 were reviewed. All records were readily available and complete. Three audits and two surveillances were conducted in 1988. Surveillance topics included: drill and exercise evaluations; operational readiness of the TSC and OSC; and a response to an actual emergency plan activation. Audits and surveillances were adequate in scope and depth. The regulatory requirements of 10 CFR 50.54(t) were addressed. The adequacy of interface between the Station and various governmental agencies was assessed as adequate per Audit QA-01-88-20, however, the scope and depth of the evaluation should be improved. QA personnel stated the checklist for this area of audit for 1989 was already being improved. The QA Department adequately tracked corrective action taken on audit and surveillance findings and recommendations.

Based on the above findings, this portion of the licensee's program was acceptable.

5. Dose Assessment (IP 82207)

LaSalle Station is using a computerized dose assessment program referred to as the "A" model. The program includes utilization of plant meteorology data which may be obtained from the onsite meteorology

tower. This tower included wind sensors at three levels; 33 feet, 200 feet, and 375 feet. Also supplied by the tower are differential air temperature and humidity parameters.

Procedures were reviewed and determined satisfactory. Dose assessment values were calculated through the computerized program or by manual calculation based on field monitoring data.

Two Station Environs Directors were able to correctly identify which sectors of the 10 mile EPZ would be affected by a plume release, what the dose rates would be at various distances of the EPZ, and what protective action recommendations would be made to offsite authorities. These activities took place as part of independent walkthroughs. Both individuals demonstrated above average competence in using and assessing the dose assessment program.

The Offsite Dose Calculation System (ODCS) has been modified since the previous inspection in December 1987 to include a two hour default value in place of the four hour default value. The new two hour default value now corresponds with the newly operational "A" model computer program. This "A" model computer program utilizes on-line real time data from specified Emergency Action Levels radiation and meteorology parameters. Information from the "A" model program can be transferred to both the TSC and EOF for evaluation and use by these facilities.

LaSalle does not have a monitored release path for a ground level release. All monitored releases would be via the plant's main chimney as evaluated releases. Ground level releases would be unmonitored. This feature is unique among the Commonwealth Edison's BWRs, according to information received from a Station Environs Director and the Corporate EP Training Supervisor at Mazon. Dose rate data for ground level releases are obtained from field monitoring readings and air samples and converted manually to dose rates.

Based on the above findings, this portion of the licensee's program was acceptable.

#### 6. TMI Safety Issues Management System (SIMS) Items

On October 31, 1980, the NRC issued NUREG-0737, which incorporated into one document all TMI-related items approved for implementation by the Commission at that time. On December 17, 1982, the NRC issued Supplement 1 to NUREG-0737 to provide additional clarification regarding Regulatory Guide 1.97 (Revision 2) - Application to Emergency Response Facilities, Emergency Response Facilities, and Meteorological Data, as well as other areas. The status of the completion of these TMI SIMS items are internally tracked by the NRC.

The below listing provides the status of the SIMS items related to emergency preparedness. The listing indicates how the item was tracked as of February 23, 1989 on SIMS, as well as what we have determined to be

the correct and current status of the item. In some cases, the status of items tracked by SIMS are incorrect and/or should be updated based on recent inspection findings. The comments provide a background and basis for the current status.

III.A. SIMS Listing: Not Listed  
Current Status: Closed

This item refers to implementation of Chapter 8 of Supplement 1 to NUREG-0737, and has been determined to be no longer applicable and has been administratively closed.

III.A.1.1 SIMS Listing: Not Listed  
Current Status: Closed

This item involved short term improvements to the emergency preparedness program and was closed at the conclusion of the Emergency Preparedness Implementation Appraisal: Reports No. 50-373/81-14; 50-374/81-09 dated June 11, 1981.

III.A.1.2.1 SIMS Listing: Closed  
Current Status: Closed

This item involved interim upgrades to the ERF's and was closed at the conclusion of the Emergency Preparedness Implementation Appraisal: Reports No. 50-373/81-14; 50-374/81-09 dated June 11, 1981.

III.A.1.2.2 SIMS Listing: Not Listed  
Current Status: N/A

This item involved design criteria for upgraded ERF's, but was subsequently determined to be not applicable (N/A).

III.A.1.2.3 SIMS Listing: N/A  
Current Status: Closed

Because this item involved ERF modifications that were incorporated into MPA-F-63, 64, and 65, this item was closed based on the Emergency Preparedness Implementation Appraisal: Reports No. 50-373/81-14; 50-374/81-09 dated June 11, 1981.

III.A.2.1 SIMS Listing: Not Listed  
Current Status: Closed

This item involved the submittal of upgraded emergency plans. This item was closed with the issuance of the SER dated March 1981 (NUREG-0519).

- III.A.2.2      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involved the submittal of emergency procedures. This item was closed at the conclusion of the Emergency Preparedness Implementation Appraisal: Reports No. 50-373/81-14; 50-374/81-09 dated June 11, 1981.
- III.A.2.3      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involved an acceptable interim meteorological program. This item was closed at the conclusion of the Emergency Preparedness Implementation Appraisal: Reports No. 50-373/81-14; 50-374/81-09 dated June 11, 1981.
- III.A.2.4      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involves an acceptable final meteorological program and has been determined to be no longer applicable and has been administratively closed.
- III.A.2.5      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involves an acceptable Class A meteorological model and has been determined to be no longer applicable and has been administratively closed.
- III.A.2.6      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involves a licensee's review of their Class A meteorological model and has been determined to be no longer applicable and has been administratively closed.
- III.A.2.7      SIMS Listing:    Not Listed  
 Current Status: N/A
- This item required the licensee to provide a description of the Class B meteorological model to the NRC. The NRC is not reviewing Class B models, therefore, this item is not applicable (N/A).
- III.A.2.8      SIMS Listing:    Not Listed  
 Current Status: Closed
- This item involves an acceptable Class B meteorological model and has been determined to be no longer applicable and has been administratively closed.

MPA-F-63           SIMS Listing:   Not Listed  
                  Current Status: Open

This item involves a review of the TSC during a future inspection.

MPA-F-64           SIMS Listing:   Not Listed  
                  Current Status: Closed

This item involved a review of the OSC, which was completed during the April 29, 1987 exercise: Reports No. 50-373/87014; 50-374/87014 dated May 22, 1987.

MPA-F-65           SIMS Listing:   Not Listed  
                  Current Status: Open

This item involves a review of the EOF during a future inspection.

MPA-F-66           SIMS Listing:   Not Listed  
                  Current Status: N/A

This item involved the Nuclear Data Link, which has been superseded by the Emergency Response Data System (ERDS). Therefore, this item is not applicable (N/A).

7. Exit Interview

The inspectors met with licensee representatives denoted in Paragraph 1, on March 2, 1989. The inspectors discussed the scope and results of the inspection. The maintenance of the program had improved over the last two annual inspections. The licensee was encouraged to continue this level of performance. The licensee indicated that items discussed were not proprietary in nature.