



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION II
101 MARIETTA ST., N.W.
ATLANTA, GEORGIA 30323

MAR 10 1989

Report Nos.: 50-348/89-01 and 50-364/89-01

Licensee: Alabama Power Company
600 North 18th Street
Birmingham, AL 35291-0400

Docket Nos.: 50-348 and 50-364

License Nos.: NPF-2 and NPF-8

Facility Name: Farley Nuclear Plant

Inspection Conducted: February 6-10, 1989

Inspector: W. H. Rankin
for J. L. Kreh

3/10/89
Date Signed

Approved by: W. H. Rankin

3/10/89
Date Signed

W. H. Rankin, Chief
Emergency Preparedness Section
Emergency Preparedness and Radiological Protection
Branch
Division of Radiation Safety and Safeguards

SUMMARY

Scope

This routine, unannounced inspection was conducted in the area of emergency preparedness, and included review of the following programmatic elements: (1) Emergency Plan and its implementing procedures; (2) emergency facilities, equipment, instrumentation, and supplies; (3) organization and management control; (4) training; and (5) independent review/audits.

Results

In the area inspected, no violations or deviations were identified. The onsite emergency preparedness program appeared to receive adequate management support. Emergency response facilities, equipment, and supplies were found to be properly maintained. The onsite emergency response training program was judged to be effective and well organized. Two problems were identified in connection with the licensee's capability to augment the onsite emergency organization during off-hours: (1) the commitment for fully staffing the Technical Support Center was two hours instead of the one-hour limit specified by NRC guidance, and (2) the claimed capability is not periodically tested. The overall findings of this inspection indicated that the licensee was adequately prepared to respond to an emergency at the Farley Nuclear Plant.

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REPORT DETAILS

1. Persons Contacted

Licensee Employees

- *S. Fulmer, Supervisor, Safety Audit and Engineering Review
- *D. Grissette, Chemistry and Environmental Supervisor (Acting)
- *A. Livingston, Environmental Supervisor (Acting)
- N. Maddox, Senior Instructor, Technical Training
- R. Martin, III, Shift Supervisor
- *D. Morey, General Manager
- *C. Nesbitt, Technical Manager
- *J. Osterholtz, Manager - Operations
- R. Swift, Unit Supervisor
- *D. Tedin, Sector Supervisor, Technical Training
- *L. Williams, Training Manager

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

NRC Resident Inspectors

- *G. Maxwell
- W. Miller

*Attended exit interview

2. Emergency Plan and Implementing Procedures (82701)

Pursuant to 10 CFR 50.47(b)(16), 10 CFR 50.54(q), and Appendix E to 10 CFR Part 50, this area was inspected to determine whether significant changes were made in the licensee's emergency preparedness program since the last unannounced inspection (March 1988), 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 program for making changes to the Emergency Plan and the Emergency Implementing Procedures (EIPs). The inspector verified that changes to these documents were reviewed and approved by licensee management. A review of records showed that all such changes since March 1988 were submitted to the NRC within 30 days of the effective date, as required. Through review of Emergency Plan/EIP revisions and discussions with licensee representatives, the inspector concluded that no major programmatic changes were made since the March 1988 inspection.

The inspector's selective review of the Emergency Plan and the EIPs disclosed a deficiency in the licensee's approach to augmenting the emergency response organization during off-hours. According to page 86 of the Emergency Plan and Section 4.9 of EIP-3 (Duties of the Emergency Director), the Technical Support Center (TSC) is to be fully staffed within two hours of an emergency declaration (Alert or higher classification). However, that commitment is not in accordance with the requirement in Supplement 1 to NUREG-0737 that the TSC will be staffed by sufficient technical, engineering, and senior designated licensee officials to provide needed support, and be fully operational within approximately 1 hour after the order is given to activate the facility (item 8.2.1.j). Because most members of the licensee's emergency response organization resided within a 45-minute driving time of the plant, relief from the 1-hour requirement appeared unwarranted. Extensive discussions between the inspector and various licensee management representatives resulted in a commitment by the licensee to consider revising the Emergency Plan and the applicable EIPs to comply with the 1-hour criterion stated above.

Inspector Follow-up Item (IFI) 50-348, 364/89-01-01: Revising the Emergency Plan and EIPs to specify that the TSC will be fully staffed and operational within 1 hour after declaration of an Alert or higher classification.

The inspector reviewed records pertaining to the two emergency declarations which had occurred since March 1, 1988. On August 24, 1988, radioactive gas was inadvertently released while returning the Boron Thermal Regeneration System to service following maintenance. On March 29, 1988, a contaminated injured individual was transported to an offsite medical treatment facility. Each of these occurrences was classified as a Notification of Unusual Event (NOUE), although later calculations determined that the first incident did not meet the NOUE criteria. Lessons learned from these events were appropriately addressed via procedural revisions and changes to the training program.

No violations or deviations were identified.

3. 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 changes in this area upon the emergency preparedness program.

The inspector toured the licensee's emergency response facilities (ERFs), including the Control Room, TSC, Emergency Operations Facility (EOF), and Operations Support Center (OSC). All facilities and emergency equipment therein appeared to be maintained in an appropriate state of readiness. According to observation by the inspector and statements by licensee

representatives, no significant ERF changes were made since the last inspection.

The inspector reviewed selected records of communications tests performed in accordance with Surveillance Test Procedure FNP-0-STP-60.0. The documentation indicated that problems which were identified were corrected expeditiously. Also reviewed was the system for periodically verifying the operational readiness of emergency equipment and supplies as delineated in FNP-0-EIP-16. Completed versions of this procedural inventory were selectively reviewed and found to have been performed as required.

A previous inspection finding (IFI 50-348, 364/88-06-01) concerned the need for a surveillance procedure for both the visual and aural components of the Plant Emergency Alarm. Testing of the purple beacons, used as the evacuation signal in high-noise areas of the plant, was completed, except for those in the containments, on January 18, 1989. Of the 146 beacons tested, 30 were found to be inoperable. Those in containment will be tested during the next outage for each unit. A procedure for performing this surveillance on an annual basis was under development and expected to be completed by March 30, 1989. However, the licensee had taken no action with respect to developing a surveillance program for the PA speakers, which were currently subjected to only a weekly functional test consisting of a 1-second sounding of the Plant Emergency Alarm. On this basis, the previous finding is closed and the unaddressed portion thereof will be tracked as the following new item:

IFI 50-348, 364/89-01-02: Development of a surveillance procedure for the PA speakers to ensure the audibility of the Plant Emergency Alarm.

No violations or deviations were identified.

4. 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, this area was inspected to determine the effects of any changes in the licensee's emergency response organization and/or management control systems on the emergency preparedness program and to verify that such changes were properly factored into the Emergency Plan and EIPs.

The organization and management of the emergency preparedness program were reviewed and discussed with licensee representatives. A significant change had occurred very recently as a result of the Chemistry and Environmental Supervisor's (anticipated) long-term absence to undergo Senior Reactor Operator training. Acting for him was the Environmental Supervisor, which was the position responsible for the day-to-day supervision of the emergency preparedness program. The Chemistry Foreman, an individual with no previous emergency planning experience, was appointed as Acting Environmental Supervisor. Because these changes had occurred so recently, their impact on the management and effectiveness of

the program could not be determined during the current inspection, but will be monitored during future inspections.

In the period since the March 1988 inspection, personnel changes in certain management positions resulted in the reassignment of several key positions involving primaries as well as alternates in the emergency response organization. Review of training records of eight such personnel confirmed that training requirements for their new positions in the emergency organization were completed prior to assignment to those positions.

Discussions with licensee representatives revealed that no program was in place to periodically demonstrate that the capability for emergency staff augmentation, as claimed in Table 3 of the Emergency Plan, actually existed during nonregular working hours. The licensee agreed to develop a system whereby this capability would be verified on a regular basis.

IFI 50-348, 364/89-01-03: Development of a program for periodically testing the capability to augment the onsite emergency response organization during off-hours.

5. 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 VIII 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 reviewed documentation of the emergency response training program, including training procedures and selected lesson plans, and interviewed members of the instructional staff. Based on these reviews and interviews, the inspector determined that the licensee had established a formal emergency training program.

The inspector conducted a walk-through with an on-duty Shift Supervisor. The individual was given several hypothetical sets of emergency conditions and plant data and was asked in each case to talk through the response he would provide as Emergency Director if such an emergency actually existed. The individual exhibited good familiarity with emergency procedures and equipment. No significant problems were observed in the areas of emergency classification, protective action decision-making, and notification of offsite authorities.

No violations or deviations were identified.

6. Independent Review/Audits (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, and

whether the licensee had a corrective action system for deficiencies and weaknesses identified during exercises and drills.

Records showed that an independent audit of the program was conducted by the Safety Audit and Engineering Review group during the period November 1-December 5, 1988, and was documented in Report No. SAER-WP-16, dated December 13, 1988. The audit appeared to have been thorough, and resulted in two significant findings ("noncompliances") and 19 comments. The audit records showed that State and local government interfaces with the licensee were evaluated. Audit findings and recommendations were formally presented to plant and corporate management.

The licensee's program for follow-up action on findings from audits, drills, and exercises was reviewed. The licensee had established a computerized tracking system called the Emergency Planning Punchlist as a tool for managing the follow-up actions taken in response to the subject findings. Each finding tracked on the Punchlist was assigned to 1 of 5 categories, based upon priority for completion. It appeared that this system functioned effectively, and that appropriate corrective actions were being implemented in a timely manner (except as noted in Paragraph 3).

No violations or deviations were identified.

7. Action on Previous Inspection Findings (92701)

- a. (Closed) IFI 50-348, 364/87-20-01: Failure to use a standardized time designation on the "FOLLOW-UP MESSAGE/PERIODIC UPDATE MESSAGE" form.

The form was modified to indicate the time as "Central" (Standard or Daylight Time, as appropriate to the date). This change brought the desired consistency to the licensee's time designations.

- b. (Closed) IFI 50-348, 364/88-06-01: Development of a surveillance procedure for the onsite warning system.

The licensee's response to this finding is discussed in Paragraph 3.

8. Exit Interview

The inspection scope and results were summarized on February 10, 1989, with those persons indicated in Paragraph 1. The inspector described the areas inspected and discussed in detail the inspection results listed below. Licensee management representatives agreed to evaluate these items and to determine if the items are feasible for program implementation.

Proprietary information is not contained in this report.

<u>Item Number</u>	<u>Description</u>
50-348, 364/89-01-01	IFI: Revising the Emergency Plan and EIPs to specify that the TSC will be fully staffed and operational within 1 hour after declaration of an Alert or higher classification (Paragraph 2).
50-348, 364/89-01-02	IFI: Development of a surveillance procedure for the PA speakers to ensure the audibility of the Plant Emergency Alarm (Paragraph 3).
50-348, 364/89-01-03	IFI: Development of a system for periodically testing the capability to augment the onsite emergency response organization during off-hours (Paragraph 4).

Licensee management was advised that the two IFIs discussed in Paragraph 7 were considered closed.