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March 15, 1983

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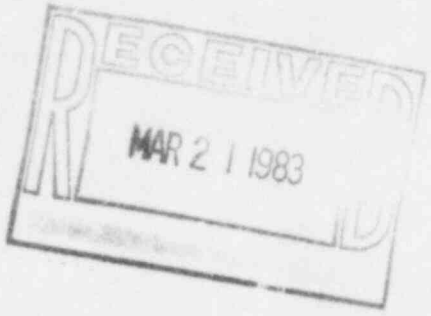

Mr. John T. Collins
Regional Administrator
U. S. Nuclear Regulatory Commission
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, TX 76011

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
Emergency Planning

Gentlemen:

The attached is provided to address those open items in your letter dated September 28, 1982, (ØCNAØ98215). Our letters dated November 1, 1982, (ØCAN118202) and January 17, 1983, (ØCANØ183Ø7) provided our commitments to provide this information.

Very truly yours,

John R. Marshall

John R. Marshall
Manager, Licensing

JRM:KE:sc

Attachment

ATTACHMENT 1

1. Specific Finding: Emergency procedures needed in the Control Room do not have any official index system to allow operators to quickly find the correct procedures. (313/8211-03; 368/8209-03)

   Comment: Currently, both the ANO Emergency Plan and the AP&L Nuclear Contingency Plan are indexed and are stored in clearly identifiable notebooks. The Emergency Plan Implementing Procedures (EPIP's) and Offsite Dose Projections Procedures are also housed in color coded notebooks. Additionally, the following improvements have just been completed.

   A. All EPIP's have been titled, tabbed and an index has been provided in front of each notebook.

   B. Appropriate HP procedures (that would be used during emergencies) have been titled and color tabbed.

   C. The remaining portions of the Duty Emergency Coordinator Notebooks have been title tabbed.

   D. An index for the Contingency Plan Procedures will be provided by March 15, 1983.

2. Specific Finding: Only dose rates were calculated in the TSC, not integrated doses which were needed to adequately determine necessary protective actions. (313/8211-26; 368/8209-26)

   Comment: Procedures 1904.06 "Radiological Plume Tracking and Dose Integration" and 1904.07 "Protective Action Recommendations" have been developed to provide integrated dose projections and to generate offsite protective action recommendations. These procedures were implemented on January 27, 1983.

3. Specific Finding: Coordination between the licensee and the State, on the early warning to the public, did not appear to be adequate because of the long time elapsing between giving the recommendation and the sounding of the sirens. (313/8211-27; 368/8209-27)

   Comment: AP&L makes protective action recommendations to the state. However, the State Plans indicate that the sirens may be sounded at the alert level or higher at the discretion of the responsible state official; therefore, they may be sounded before recommendations for such are made by AP&L. It is mandatory that they be sounded upon reaching the site or general emergency levels. Efforts are being made to assure that all protective action recommendations and EAL notifications are distributed to the State in a timely fashion.

   In fact, meetings between AP&L and the Department of Health were recently held to discuss the information flow between AP&L and the State during all phases of the activation of the Emergency Response Organization. It has been mutually agreed that the respective liason

personnel will be utilized more fully to coordinate the flow of information between the two organizations.

4. Specific Finding: The size of the TSC was inadequate to support the TSC staff and the NRC. (313/8211-28; 368/8209-28)

   Comment: The TSC has been enlarged by 20%.

5. Specific Finding: Radiological monitoring in and around the EOF was not adequate. Air samples were not taken in a timely manner following the release; the air sampling locations did not enable representative samples to be taken around the EOF; personnel were not monitored when entering the EOF; and, the capability of the EOF decontamination facility was not demonstrated as it was not activitated. (313/8211-47; 368/8209-47)

   Comment: Procedures exist which address radiological surveys around the ECC (EOF). (Procedure 1622.030 "Offsite Emergency Monitoring" - Section 6.1)

   Personnel will be monitored when entering the ECC (Procedure 1622.029 "Emergency Radiological Controls" - Section 6.3 and Form A of Rev. 1). Rev. 1 is currently in review and is scheduled for implementation by March 15, 1983. The decontamination facility was not demonstrated because the scenario did not call for its activation.

6. Specific Finding: Specific procedures and plans for rumor control are needed. (313/8211-40; 368/8209-40)

   Comment: This item is addressed in the new communications procedures where a Rumor Control Coordinator is established to monitor all rumors. Attachment 2 is Section VIII from the March 1, 1983, revision that addresses rumor control.

7. Specific Finding: The inspectors did not observe a formal transfer of command from the TSC to the EOF, or from the IRD to his alternate, when the IRD left to perform media briefings. (313/8211-48; 368/8209-48)

   Comment: This item was addressed in the Emergency Response Training session held February 17, 1983, and will be exercised in the upcoming drill.

8. Specific Finding: The licensee should, when time permits, confer with the NRC when making decisions to allow selected individuals to receive radiation exposures during emergency situations, which exceed the limit established for exposure during normal operations as specified in 10 CFR part 20. (313/8211-54; 368/8209-54)

   Comment: This item, along with general concerns as to who to confer with in the NRC, was addressed in a training session taught by J. T. Baird of NRC Region IV on February 19, 1983.

9. Specific Finding: The onshift duty officer in the Little Rock Control Center (LRCC) did not have adequate background or training to enable him to understand the technical jargon used during the notification of the emergency from the ANO Control Room. Further, the duty officer was not familiar with the operation of the recording equipment in the LRCC. (313/8211-55; 368/8209-55)

   Comment: This item was addressed in training for this facility held on March 2, 1983. Also the notification procedure in contingency plan procedure three has been shortened to eliminate the detailed technical information that the duty officer is required to complete.

10. Specific Finding: Some of the necessary forms and maps were not stocked in emergency kits at the OSC. (313/8211-14; 368/8209-14)

    Comment: Controlled sets of procedures, containing necessary forms, are maintained in two locations on the second floor of the OSC.

    The maps contained in the Onsite Radiological Monitoring Kit will be inventoried and restocked as necessary by March 15, 1983.

11. Specific Finding: There was not adequate and real-time radiation dosimetry coverage for either the TSC facility or the people in it. The Continuous Air Monitor (CAM) was moved away from the TSC because it was too noisy. Some TSC staffs were not provided with adequate dosimeters (e.g., some received no dosimetry and TLD dosimetry was not provided). (313/8211-19; 368/8209-19)

    Comment: The Continuous Air Monitor was moved to a location just outside the TSC, however continuous coverage was still provided as the monitor was operating on the same ventilation system as the TSC.

    TLD's are provided to all TSC personnel, also 20 personnel dosimeters are available in the Onsite Technical Support Center Kit. The Health Physics Superintendent will ensure that personnel dosimeters are distributed to the TSC staff.

12. Specific Finding: The Health Physics OSC Supervisor did not have an assigned communicator/logger to take care of the vast amount of information passed to the OSC during the emergency. (313/8211-09; 368/8209-09)

    Comment: A communicator/logger will be assigned by the Health Physics OSC Supervisor upon activation of the onsite radiological monitoring section of the Emergency Radiation Team.

13. Specific Finding: The OSC did not have a status board or other device to display plant status information, team assignments, actual location of team members, and up-to-date radiological survey results (maps). Furthermore, the process of keeping records (surveys, smears, air samples, dosimeter readings, and MPC-hours) needed improvement. The forms used were informally organized. (313/8211-10; 368/8209-10)

Comment: The OSC, because of its layout, does not have one central location for displaying a status board.

The Emergency Radiation Team Leader will track team members and team assignments plus maintain records in a tabbed notebook.

Procedure 1622.029 "Emergency Radiological Controls" is currently in revision and will provide instructions to post radiological survey results in the TSC and OSC. This procedure is scheduled for implementation by March 15, 1983.

14. Specific Finding: There were no dose assessment, release plume tracking, or plant radiological survey status boards in the TSC. This contributed to the DEC not being aware of available field monitoring data. (313/8211-23; 368/8209-23)

Comment: Dose assessment and release plume tracking status will be posted in the TSC via status boards or other means.

Procedure 1622.029 "Emergency Radiological Controls," currently in revision, will include instructions to post radiological survey results in the TSC. This procedure revision is scheduled for implementation by March 15, 1983.

15. Specific Finding: Continuous radiation monitoring devices, with both audible and visual alarms, for measuring radiation inside the TSC were not provided. (313/8211-30; 368/8209-30)

Comment: An RM-14 radiation monitor is available in the onsite Technical Support Center Kit. The Health Physics Superintendent will ensure that it is placed into service in the TSC.

16. Specific Finding: Calculation of projected offsite doses appeared to be slow and cumbersome. Projected offsite dose rate calculations were not available from the TSC for 45 minutes after effluent release data was available. The TSC dose assessor used the procedure but was observed to be paging back and forth through the procedure to complete the calculations (313/8211-32; 368/8209-32)

Comment: The TSC dose assessor now has two assistants who have received training in accident assessment. Also the offsite dose projection procedures have been revised and reorganized to facilitate their use.

17. Specific Finding: The members of the fire team did not have radios or sound equipment or self-contained breathing apparatus (SCBA) masks to enable them to maintain communications with each other and the control room. The only report made to the control room on the status of the fire was made by telephone, well after the fire was out. (313/8211-58; 368/8209-58)

Comment: Equipment has been purchased which provides the capability to maintain radio communications while wearing a respirator mask. Training of appropriate emergency response personnel in the use of this

equipment is currently in progress and will be completed as part of the 1983 Emergency Response Training Program.

18. Specific Finding: Full accountability of all personnel onsite took 58 minutes, which does not meet the 30-minute criteria. The excess 28 minutes was expended trying to account for only 11 unaccounted for persons. (313/8211-73; 368/8209-73)

    Comment: The majority of the excess 28 minutes was spent in an attempt to account for a new employee who had failed to return his security badge when he exited the plant. Upon plant evacuation a security guard will be posted at the exit points with specific instructions to ensure that all security badges are returned.

19. Specific Finding: Evacuated site personnel were not monitored for contamination during the evacuation or later at the EOF. Further, the portal monitors in the security building were moved out of the way to facilitate egress. This was a potentially serious lapse of accepted health practices. (313/8211-75; 368/8209-75)

    Comment: The portal monitors in the security building will remain in place during a plant evacuation. Also upon activation of the ECC, portal monitors will be placed in service at the entry points. Evacuees will therefore be monitored upon exiting the plant and when entering the ECC. Instructions for placement of the ECC portal monitors are included in the Nuclear Contingency Plan procedure number 6 under ECC Activation Checklist.

20. Specific Finding: The NRC players, on a number of occasions during exercises, requested information on the isotopic analysis of the reactor coolant system sample, but that information was not available. The inspectors later determined that piping into the PASS was valved off in the auxiliary building and that the electrically operated valves in the PASS system were not connected to power. Further, the inspectors discussed with the licensee the ability to obtain a primary coolant sample during a power failure. There was concern expressed by the inspectors that loss of onsite and offsite power might prevent the licensee from obtaining a representative sample of the primary coolant, since the sample system is electrically operated. (313/8211-77; 368/8209-77)

    Comment: As stated in AP&L's letter to Mr. John Collins dated June 18, 1982, (ØCANØ68208), NUREG-0737 requires licensee to install a single Post Accident Sampling System. ANO's PASS system is non-redundant, non safety-related and therefore not required to be operable continuously. However, a demonstration of the PASS system to analyze the RCS is an objective for the 1983 Emergency Preparedness Exercise.

ATTACHMENT 2

VIII. F. RUMOR CONTROL

During a nuclear emergency the flow of factual information to employees and the general public becomes critical. This is especially true in the immediate area around the plant site. To assure the employees and public are informed of the actual conditions, the following procedures will be set into operation when the Emergency Media Center is activated or earlier, if deemed necessary by the Communications Superintendent and the Incident Response Director.

1. Local radio stations in the Russellville, Dardanelle and Little Rock areas will be monitored.

2. Television stations in the Little Rock area will be monitored.

3. The Divisional Services Department will be responsible for establishing a Rumor Control Coordinator. This person will collect and consolidate all rumors company wide and provide them to the Communications Superintendent for response. A standard form will be used to relay information to the Communications Superintendent for response. (Appendix B)

4. A message to all employees (Attachment VIII F.1) will be distributed via Exciter Update, AP&L Today and the customer services teleprocessing system asking them to advise the Rumor Control Coordinator of all rumors concerning the emergency.

5. The Rumor Control Coordinator can notify the Communications Superintendent of all rumors by either telephone or telefax equipment at the Emergency Media Center.

6. Upon receipt of the rumor by the Communications Superintendent or his designee, the request for information will be sent to the IRD for response. The request will be time dated.

7. When the IRD, or his designee, has responded to the information request, the Communications Superintendent will determine what action should be taken to respond to the rumor.

8. The Internal Communications Coordinator will promptly make available to the Rumor Control Coordinator a copy of all news releases or information updates.

9. The primary system of notifying business offices will be the customer services teleprocessing system. The alternate system will be by calling division administrators, who will then notify district offices.

10. The Rumor Control Coordinator will distribute approved information releases to all business offices via the customer service teleprocessing system.

11. The Internal Communications Coordinator will prepare Exciter Updates & AP&L Today messages for all employees.

12. The Company Media Representatives will serve as the communications link between the EMC and the Rumor Control Coordinator.