

Docket No. 50-346

License No. NPF-3

Serial No. 1-364

June 21, 1983



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

James G. Keppler, Regional Administrator
Region III, Office of Inspection & Enforcement
United States Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

Toledo Edison acknowledges receipt of your May 16, 1983 letter (Log No. 1-787, Inspection Report 50-346/83-07), covering the Annual Davis-Besse Emergency Planning Exercise for 1983. No violations or deviations were identified during the exercise. Attachment 1 of this letter, however, does respond to weaknesses identified in observations over the exercise period.

The full scale emergency response participation of the Nuclear Regulatory Commission was an excellent opportunity to fully exercise our inter-organization communication and validate the functionability of our Emergency Response Facilities. We considered this first joint experience very successful. Recognizing the interest you expressed in hearing any results of our critique that could lead to improving any Region/Utility joint response, Attachment 2 provides our comments for your consideration.

Should you have any questions, please contact me at any time.

Very truly yours,

R. P. Crouse / TJM

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cc: DB-1 NRC Resident Inspector

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1. Weakness: Exercise objectives and the draft scenario were not provided for NRC technical review in conformance with guidance provided by the NRC Region III Regional Administrator. (Report 50-346/83-07, Paragraph 5.a)

Response: The exercise objectives were delayed due to travel difficulties with FEMA attendance at a planning meeting. The scenario development was delayed due to the late revision of the drill participants. For future exercises, Toledo Edison will make every effort to meet the deadlines.
2. Weakness: Inadequate data were available in the scenario regarding in-plant radiation levels and offsite airborne radiation levels for plume tracking purposes. (Paragraph 5.a)

Response: Future scenarios for annual exercises will include more detailed in-plant radiation levels and offsite airborne radiation levels for plume tracking.
3. Weakness: An inadequate number of exercise controllers were assigned to the Control Room, Operations Support Center (OSC), and Radiological Testing Laboratory. (Paragraph 5.a)

Response: Depending on the complexity of the scenario for future exercises, a more detailed review will be made of the necessity for exercise controllers within the Control Room, Operations Support Center, and Radiological Testing Laboratory. The scenario requirements, as well as the normal emergency staffing of each facility, will be studied to find an appropriate number of controllers needed without creating a crowding situation in any area or leaving any area with too much work for the controller present.
4. Weakness: The Radcon Operations Manager became overly involved in evaluating offsite dose projections and in protective action decisionmaking in addition to procedurally assigned tasks. (Paragraph 5.c)

Response: The Radcon Operations Manager, because of his expertise, is used to assist in the evaluation of offsite projections. Because the NRC Site Team was stationed in the Technical Support Center interacting with the Radcon Operations Manager on dose projections, and not in the Emergency Control Center (ECC) where the activity was occurring, the Manager became

more involved in projections than normally occurs or is expected. In the future, the ECC will be the location for both the utility and NRC Site Team's protective actions effort.

5. Weakness: The Radcon Operations Manager had inadequate staff to assist him in performing assigned tasks. (Paragraph 5.c)

Response: Because of the increased interaction with the NRC Site Team and the need to be involved in offsite dose projections, the Radcon Operations Manager was more involved than previously seen in drills. A staff of Chemistry & Health Physics trained personnel from Facility Engineering will be assigned to the Technical Support Center staff.

6. Weakness: Technical Support Center (TSC) status board design is inadequate with respect to providing guidance on key plant parameters to be plotted and trended, protective action recommendation chronology and status, and current and forecast meteorological conditions. (Paragraph 5.c)

Response: The Emergency Planning Group will review Technical Support Center status board uses and needs with the TSC staff and provide a written report on these needs no later than October 15, 1983. Recommendations from the report will then be evaluated for incorporation into the TSC function. The need for protective action and meteorological status posting is limited because of the detailed posting of status in the Emergency Control Center.

7. Weakness: Inadequate staff were assigned to perform offsite dose projection computations and to assist in protective action decisionmaking within the Emergency Control Center (ECC). (Paragraph 5.d)

Response: A minimum of three persons, the on-duty EDO, the EDO doing dose calculation, and the Emergency Operations Manager, were involved in all protective action decision-making - a team deemed acceptable by Toledo Edison. During Emergency Duty Officer (EDO) training in 1983, the EDO's will be instructed to carefully review the personnel needs for dose calculations. Adequate staff is available within the Emergency Control Center

8. Weakness: Procedure AL 1827.10 must be revised to incorporate the keyhole approach for identifying affected offsite regions for General Emergency classifications, and must adequately address both the evacuation and sheltering options.

Response: The keyhole approach, although not included in a formal procedure, is considered by personnel responsible for offsite recommendations. These concepts will be incorporated into a procedure in conjunction with the completion of a previous commitment to develop a flow chart for immediate offsite recommendations. This item will be complete by January 1, 1984.

9. Weakness: The ECC did not keep offsite Radiological Monitoring Teams (RMTs) periodically appraised of plant status, computed plume location, and projected dose rates in sampling locations. (Paragraph 5.d)

Response:

- a. A status board will be provided in the Radiological Testing Lab (RTL) for recording plant status, plume location, and projected dose rates in sampling locations. RMT's will have access to this board when they return to the RTL with samples. The status board will be in place by February 1, 1984.
- b. Procedure EI 1300.08, Emergency Control Center Activation, will be revised to direct the Emergency Duty Officer to assign a Support Person/Communicator to the Radiological Testing Laboratory to perform status board updates and telephone communicating duties. The Emergency Planning Section will complete this procedure revision by September 1, 1983.

10. Weakness: Rumor control was inadequate in the Operations Support Center. (Paragraph 5.e)

Response: The Annual Engineering Assessment and Emergency Preparedness Training shall include discussion as to the effective management and communication of information. Training will be completed prior to January 1, 1984.

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11. Weakness: RMTs were provided with inadequate backup communications equipment, as there is no guarantee that teams will always have easy access to public or private telephones. (Paragraph 5.f)

Response: Radiation Monitoring Teams utilize mobile (UHF) radios as a means of primary field communications. In addition, RMT kits are provided with currency for public telephone use, in the event UHF radio communications fail. Also, the geographic location of the Davis-Besse Nuclear Power Station would, in the event radio and telephone communication fail, allow RMT's to return to the site within 30 minutes from any sampling point in the 10 mile Emergency Planning Zone.

In light of the current primary and alternate communication provisions, no action on Item 11, Appendix A, will be taken by Toledo Edison.

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Comments provided for consideration to improve the effectiveness of the joint NRC Site Team/Utility interface.

Comment 1 - Our emergency response staff was not familiar enough with the actual duties of the NRC Protective Measures and Reactor Safety Teams. Due to the multiple responsibilities of members of the teams, their accessibility to utility counterparts for interaction was limited.

Comment 2 - Much of the protective measures portion of the NRC Site Team's time was spent with NRC Washington, while located in the Technical Support Center rather than the Emergency Control Center. This significantly limited utility-NRC protective measures teams interaction.

Comment 3 - Due to the significant time the NRC site Public Information Team member spent in communication with Washington, he was not available to confer with the joint Utility-State Public Information staff on news releases or joint press conferences.

Recommendation: To clarify what the real Site Team responsibilities or interactions with my emergency response staff will be, I would like to suggest our emergency planning staffs meet in the near future.