

James A. FitzPatrick  
Nuclear Power Plant  
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Corbin McNeill  
Resident Manager

August 2, 1984  
JAFP-84-0757

United States Nuclear Regulatory Commission  
Region I  
631 Park Avenue  
King of Prussia, PA 19406

Attention: Thomas T. Martin, Director  
Division of Engineering and  
Technical Programs

SUBJECT: James A. FitzPatrick Nuclear Power Plant  
Docket No. 50-333  
Inspection No. 84-10

Gentlemen:

In accordance with the provisions of 10 CFR 2 Appendix C, we are submitting our response to Appendix A, Items of Concern Identified, transmitted by your letter dated July 3, 1984, as received by the undersigned on July 9, 1984. This refers to the inspection conducted by Mr. J. Hawxhurst and Mr. I. Cohen of your office on May 21 through 25, 1984, at the James A. FitzPatrick Nuclear Power Plant.

#### RESPONSE TO ITEMS OF CONCERN IDENTIFIED

1. Open Item 84-10-01: Provide specialized training to shift supervisors (emergency directors) in regard to Protective Action Decision Making (EAP-18).

#### Response:

The Power Authority agrees to provide specialized training to shift supervisors (emergency directors) in regard to Protective Action Decision Making (EAP-18). This action should result in a more effective response by the shift supervisors in regards to protective action recommendations.

The specialized training on EAP-18 for shift supervisors will be conducted during Cycle 8 of the annual operations training schedule from October 21, 1984 to December 1, 1984.

Permanent corrective action will be to continue to provide training on EAP-18 to shift supervisors on an annual basis.

2. Open Item 84-10-02: Update and distribute Emergency Organization assignments quarterly and complete all required training for personnel added to the list within six weeks of being placed on the list.

Response:

The Power Authority agrees to update and distribute Emergency Organization assignments quarterly and complete all required training for personnel added to the list within six weeks of being placed on the list.

The Emergency Plan and EAP-17 have been revised to allow the Emergency Planning Coordinator to update and distribute Table 5.2 "Emergency Organization Assignments" quarterly. The first quarterly update will take place by October 1, 1984.

3. Open Item 84-10-03: Computerize the initial dose assessment method:
  - a. Consider use of 15 minute computer generated average meteorological measurements (i.e., wind speed, wind direction and a measure of atmospheric stability) in the offsite dose calculations;
  - b. Designate a specific individual to provide initial dose calculations to the Emergency Director prior to the activation of the TSC or EOF;
  - c. Implement procedure EAP-21, the refined dose assessment model used in the TSC/EOF; and also
  - d. Include a date and signature on the correction factors provided for calculating release rates from the plant stack and vent monitor readings.

Response:

The Power Authority will continue its efforts to computerize the initial dose assessment method.

The immediate corrective action for parts (a) and (c) is to revise IAP-1 and Section 6.2 of the Emergency Plan to implement EAP-21 as the primary means of dose assessment in the TSC and EOF and the manual method as the initial dose calculation method in the Control Room. IAP-1, Section 6.2 of the Emergency Plan and EAP-21 implement 15 minute computer generated meteorological data for offsite dose calculations. This data is provided from the Niagara Mohawk meteorological instrumentation and computer system.

Training of the operators for accessing this data will be completed by November, 1984.

A new computer system to provide 15 minute meteorological data is currently being installed at JAFNPP. Completion of this installation is scheduled for January, 1985. Based on the expected completion of this computer system, the Authority expects to provide 15 minute meteorological data for offsite dose calculations from the JAFNPP computer by February 15, 1985.

The permanent corrective action for part (b) will be to have an on-shift RES technician provide initial dose calculations to the Emergency Director prior to the activation of the TSC or EOF. This will take place by the completion of the next annual emergency plan training cycle for RES technicians, which will be completed by July 31, 1985.

The permanent corrective action for part (d) will be to have the correction factors form include a date and signature. This form will also become incorporated in the next revision of PSP-5 "Radioactive Airborne Sampling, Analysis and Equipment Calibration" to be filled out by the designated RES technician. Revision of PSP-5 will be completed by November 1, 1984.

4. Open Item 84-10-04: Meteorological monitoring program.
  - a. Take immediate corrective action to recalibrate and adjust the meteorological strip charts and also, identify the 61(m) and 9(m) wind direction and wind speed and also the 8-61(m) delta temperature meteorological parameters as safety related and provide daily surveillance checks of the display parameters.
  - b. Provide a complete description of the FitzPatrick (Niagara Mohawk) meteorological monitoring program in FSAR Section 2.2 in the next revision.
  - c. Provide a procedure to implement the remote interrogation capabilities of the meteorological monitoring system.

Response:

The immediate corrective action for part (a) was to recalibrate the strip chart displays in the control room. The permanent corrective action for part (a) will be to develop procedures for assuring strip chart displays are properly calibrated and maintained by December 31, 1984.

With respect to identification of the meteorological parameters as safety related, the Authority cannot identify the meteorological parameters or equipment which provides the parameters as safety related. As previously described in our April 5, 1982 letter (JPN-82-36) from J. P. Bayne to D. B. Vassallo, meteorological data such as 9(m) and 61(m) wind speed and direction data is transmitted to JAFNPP by Niagara Mohawk from equipment at the nearby Nine Mile Point Unit 1 site.

Niagara Mohawk personnel maintain the meteorological equipment with calibration and maintenance procedures which have been reviewed and approved by the Niagara Mohawk Site Operations Review Committee. To provide additional assurance with respect to proper calibration and maintenance of the meteorological equipment the Authority will, on an annual basis, audit performance of calibrations by Niagara Mohawk personnel. The first of these audits will be completed by December 31, 1984.

The corrective action for part (b) will be to include a complete description of the FitzPatrick meteorological monitoring program in the next revision of FSAR Section 2.2.

The corrective action for part (c) was to implement EAP-25 "Offsite Agency Meteorological and Radiological Assessment System Access".

5. Open Item 84-10-05: Review the comments related to changes to the Emergency Plan and include appropriate changes within the next annual revision.
  - a. Include a cross reference of NUREG-0654 initiating conditions for the EALs.

Response:

The Power Authority agrees to review the comments related to changes to the Emergency Plan and include appropriate changes within the next annual revision. This will include a cross reference of NUREG-0654 initiating conditions for the EAL's by December 31, 1984.

6. Open Item 84-10-06: Revise IAP-1, Emergency Plan Implementation to provide a checklist for the Emergency Director to ensure performance of major tasks during the four classes of emergencies.
  - a. Include provisions for initialing communication - EAP-1.1 "Notification Data Form" and making a plant staff announcement (Emergency Director).



Response:

The Power Authority agrees to revise IAP-1, "Emergency Plan Implementation Checklist" to provide a checklist for the Emergency Director to ensure performance of major tasks during the four classes of emergencies including provisions for initialing communication - Form EAP-1.1 "Notification Fact Sheet" and making a plant staff announcement (Emergency Director). This will be completed by August 31, 1984.

7. Open Item 84-10-07: Develop procedure for activation and operations within AEOF.

Response:

The Power Authority agrees to develop a procedure for activation and operations within the AEOF. EAP-14.2 "Emergency Operations Facility Activation" will be revised to include activation and operations within the AEOF. This will be completed by September 30, 1984.

8. Open Item 84-10-08: Show within appropriate implementing procedures how continuous accountability is maintained at each emergency response facility.

Response:

The Power Authority agrees to show within appropriate implementing procedures how continuous accountability is maintained at each emergency response facility.

EAP-14.4, 14.2 and 14.5 will be revised to maintain continuous accountability using the sign-in/out entrance registration log. This will be completed by August 31, 1984.

Very truly yours,

*William T. Martin, Jr. / by direction*

CORBIN A. McNEILL, JR.  
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