

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-002/85002(DRSS)

Docket No. 50-002

License No. R-28

Licensee: University of Michigan
Phoenix Memorial Laboratory
Ford Nuclear Reactor
Ann Arbor, MI 48109

Facility Name: Ford Nuclear Reactor

Inspection At: University of Michigan, Ann Arbor, MI

Inspection Conducted: May 29-30, 1985

Inspectors: *J. P. Patterson*
J. P. Patterson

6/12/85
Date

N. R. Williamsen
N. R. Williamsen

6/12/85
Date

Approved By: *M. P. Phillips*
M. P. Phillips, Chief
Emergency Preparedness Section

6/12/85
Date

Inspection Summary

Inspection on May 29-30, 1985 (Report No. 500-002/85002(DRSS))

Areas Inspected: Routine, unannounced inspection of the onsite emergency preparedness program at the Ford Nuclear Reactor involving licensee actions on previously-identified items related to emergency preparedness. The inspection involved 14 inspector-hours onsite by two NRC inspectors.

Results: No items of noncompliance or deviations were identified.

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DETAILS

1. Persons Contacted

R. Burn, Reactor Manager
G. Cook, Assistant Reactor Manager
B. Dicey, Senior Health Physicist

All those listed above attended the exit interview.

2. Licensee Actions on Previously-Identified Items Related To Emergency Preparedness

- a. (Closed) Open Item No. 002/84-02-01. The Emergency Action Levels (EALs) as listed in Table 1 of Section 4 of the Emergency were considered deficient because they did not contain the following EALs to include other potential events which could necessitate classification and subsequent emergency actions:

Unusual Event - Other plant conditions exist that warrant assuring emergency personnel are available to respond and assuring information will be provided to offsite authorities.

Alert - Other plant conditions exist that warrant notification of the emergency response staff and activation of the emergency response center.

Alert - Loss of physical control of the facility.

These EALs have been added by the licensee to Table 1, Section 4 of the Emergency Plan as reviewed by the inspector. This item is considered closed.

- b. (Closed) Open Item No. 002/84-02-02: The licensee was requested to include a statement in the procedures directing emergency personnel to verify that the Phoenix Memorial Laboratory (PML) is evacuated after an evacuation alarm is initiated.

The licensee has included a statement in Operating Procedure 101, Section 7.3 that requires verification of evacuation for all three floors of the Reactor Building and all three floors of the PML. Also Appendix 2 of the Emergency Plan, Section 1.2 requires inspection/verification of the laboratories and hot caves of PML to ensure personnel evacuation. These two procedural changes as reviewed by the inspector were considered satisfactory. This item is considered closed.

- c. (Closed) Open Item No. 002/84-02-03: The licensee was requested to specify in the Emergency Plan where essential and nonessential personnel were to assemble during evacuation. The inspector's review of Sections 7.4.3 and 7.5.3 of the Emergency Plan identified

a location for essential personnel to assemble during evacuation, namely, the emergency support center (Front Lobby). Nonessential personnel are directed in the Emergency Plan to assemble in the A. E. White Auditorium Lobby of the Cooley Laboratory. This item is considered closed.

- d. (Closed) Open Item No. 002/84-02-04: The licensee was requested to include a statement in the Emergency Plan to assure that nonessential personnel are promptly accounted for, interviewed and monitored for radiation prior to release from the site. The inspector's review of the revised Emergency Plan and Appendix 2 to the plan determined that these actions are listed in Section 7.5.3 and also in Appendix 2 as part of immediate actions.

3. Licensee Actions on Appraisal Improvement Items

- a. The licensee was requested to consider revising Appendix 2 to more clearly delineate the responsibilities of the Emergency Director. The inspector confirmed in his review that Appendix 2 has been revised to include more specifics to better delineate the responsibilities of the Emergency Director.
- b. The licensee was requested to consider revising Appendix 3 of the Emergency Plan to ensure that at least one member of the Radiation Control Service (RCS) will always be notified of an emergency at the Ford Nuclear Reactor as part of the six Emergency Staff members that are to be notified. The licensee chose not to make this change. Reactor management representatives contend since three of the Emergency Staff are notified to report for all types of alarms and other specified emergency conditions except a tornado watch and/or warning, they can then evaluate the emergency and notify a representative of RCS to report by telephone or beeper if necessary.
- c. The licensee was requested to consider providing additional emergency response training in the area of EALs and event classification. Appendix 2 was revised in November 1984, to emphasize emergency assessment actions and classification. The notification format in Appendix 2 was enlarged upon and the sequence of actions to be taken was clarified. Training is conducted annually as part of the facility requalification program. In the annual Ford Nuclear Reactor Emergency Plan conference, which is a joint meeting with university and offsite support agencies, an emergency exercise was included which involved PML and Ford Nuclear Reactor personnel. This exercise included critiques which are used to evaluate weaknesses in the exercise and discussions with participants to improve the training program. The licensee's actions in this training item are considered satisfactory as evaluated by the inspector.
- d. The licensee was requested to consider maintaining a calibrated air sampler in the emergency locker. The inspector confirmed that this air sampler has been calibrated and is now included on an annual recalibration schedule.

- e. The definitions of site and site boundary have been clarified and are now consistent as delineated in the Emergency Plan, Page 13, Items 2.21 and 2.22. Figure 4.1 of Appendix 4 to the plan also identifies the site boundary as it relates to the Ford Nuclear Reactor and other buildings making up the site.
- f. The licensee was requested to consider specifying the location of the decontamination facilities in the Emergency Plan. The licensee chose not to identify the location of these facilities in the Emergency Plan to allow for flexibility to change the location without making a change in the plan. There is presently a facility procedure which includes a scheduled inventory and restocking of emergency equipment and decontamination facilities assuring that these facilities are being maintained.
- g. The licensee was requested to consider including in the emergency procedures recordkeeping of personnel doses during an emergency. Appendix 2, Item 1.7 has been revised to include recordkeeping of film badge numbers and names of personnel to whom badges are issued.
- h. The licensee was requested to consider controlling the access door from the Cooley building during an emergency. Appendix 2, Item 1.4, Immediate Actions, now includes the following statement, "Control access through the lobby, southwest access, and Cooley tunnel doors." This access door control is now considered to be satisfactory by the inspector.

4. Exit Interview

The inspectors held an exit interview on May 30, 1985, at the conclusion of the inspection. Those licensee representatives who attended are listed in Section 1. The inspectors briefly described the scope of this inspection.

The Reactor Manager informed the inspectors that a full-time Health Physicist has been assigned to the Ford Nuclear Reactor since July, 1984, to fill the vacancy observed during the April 1984 appraisal. Also he agreed to the inspector's request that the Health Physicist and the Health Physicist Technician be included as participants in the annual Ford Nuclear Reactor Emergency Plan Conference and emergency exercise as part of their annual emergency preparedness training.

The inspectors discussed the content of the report to determine if the licensee considered that any of the information was proprietary. The Reactor Manager and the Assistant Reactor Manager responded that in their judgment none of the information should be proprietary.