

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-266/85005(DRSS); 50-301/85005(DRSS)

Docket Nos. 50-266; 50-301

Licenses No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company
231 West Michigan
Milwaukee, WI 53201

Facility Name: Point Beach Nuclear Power Plant, Units 1 and 2

Inspection At: Point Beach Site, Two Creeks, WI

Inspection Conducted: May 6-9, 1985

Inspectors: W. Snell

Team Leader

W. Snell
5/22/85
Date

G. Brown

G. Brown
5/22/85
Date

Approved By: M. Phillips, Chief
Emergency Preparedness Section

M. Phillips
5/22/85
Date

Inspection Summary

Inspection on May 6-9, 1985 (Report Nos. 50-266/85005(DRSS); 50-301/85005(DRSS))

Areas Inspected: Routine, unannounced inspection of the following areas of the Point Beach Nuclear Plant emergency preparedness program: emergency detection and classification; protective action decisionmaking; notifications and communications; shift staffing and augmentation; knowledge and performance of duties (training); licensee audits; changes in the emergency preparedness program; and, licensee actions on previously-identified emergency preparedness items. The inspection involved 134 inspector-hours onsite by three NRC inspectors and one consultant.

Results: Two apparent items of noncompliance were identified: failure of Shift Superintendents to make an adequate offsite protective action recommendation (protective action decisionmaking); and, failure to conduct required training of all key emergency response personnel (knowledge and performance of duties). No items of noncompliance or deviations were identified in the remaining five areas inspected. In addition, one Unresolved Item in the area of security events and the way they are addressed in the Emergency Action Levels is being reviewed.

DETAILS

1. Persons Contacted

- *J. Zach, Plant Manager
- *R. Link, Superintendent Engineering, Quality and Regulatory Services
- *D. Stevens, Emergency Preparedness Coordinator
- *R. Bruno, Superintendent Training
- *T. Koehler, General Superintendent (DCS)
- *K. Nickels, Quality Specialist
 - K. Draska, Shift Superintendent
 - E. Ziller, Shift Superintendent
 - L. Kamyszek, Shift Superintendent
 - I. Bleeker, Shift Superintendent
 - T. Sheley, Shift Superintendent
 - R. Mulheron, Shift Superintendent
 - J. Reisenbeucher, Duty and Call Superintendent
 - D. Johnson, Project Engineer - Radiological
 - H. Gleason, Emergency Preparedness Training Specialist
 - G. Maxfield, Superintendent - Operations
 - T. Lucas, Engineer - Quality Assurance
 - K. Wotachek, Senior Clerk
 - E. Manos, Specialist - Nuclear
 - J. Smith, Training Specialist
- *R. Hague, NRC Senior Resident Inspector
- *R. Leemon, NRC Resident Inspector

*All personnel listed above attended the exit interview on May 9, 1985.

2. Licensee Actions on Previously-Identified Emergency Preparedness Items

a. 266/820XX-02; 301/820XX-02 (Closed) Meteorological Monitoring System

During the fall of 1984 the installation of the inland 10-meter meteorological monitoring tower was completed. This tower measures wind speed, wind direction and sigma theta at a level of 10 meters. A "Note" was added to EPIP 1.4 (Revision 12 dated March 22, 1985) that addresses using wind direction from this inland tower in conjunction with the onsite wind direction to determine if a lake breeze event may be present. This completes the licensee's installation of the meteorological monitoring system. A complete review of the integration of the meteorological data available from the monitoring system into the dose assessment program and protective action decisionmaking will be conducted during the Emergency Response Facility Appraisal.

b. 266/82008-11; 301/82008-11 (Closed) Communications

A review of the September 1983 and September 1984 exercise reports (Nos. 266/83018; 301/83017 and 266/84016; 301/83014 respectively)

showed that radio communications with offsite radiological monitoring teams were adequate. In addition, dedicated phone lines are available between the EOF and the TSC and between the EOF and the NRC. For the Point Beach Nuclear Plant or the Kewaunee Nuclear Power Plant to utilize offsite monitoring teams dispatched from the others facility, the initiating facility will provide any necessary portable radios for the teams so they can communicate.

c. 266/83025-16; 301/83023-16 (Closed) Protective Action Recommendations

The mechanism for recommending protective actions to the appropriate State and local authorities has been established. The plan identifies protective action guidance adopted by the State of Wisconsin from the Manual of Protective Action Guides and Protective Actions for Nuclear Incidents (EPA-520/1-75-001). Protective action guidance is also provided for potential releases in that the guidance provided in NRC IE Information Notice 83-28 and Appendix 1 of NUREG-0654 is included in EPIP 1-5 as an Attachment.

d. 266/83025-19; 301/83023-19 (Closed) Monthly Communications Checks

A review was made of Section 3.4.1 of Chapter 8.0 of the January 25, 1985 version of the Emergency Plan and it was determined that it is consistent with 10 CFR Part 50, Appendix E, IV.E.9.d. The plan now states that communications with the NRC Operations Center will be tested monthly from the control room, TSC and EOF.

e. 266/84013-01; 301/84011-01 (Closed) NOV - Annual Review of EALs

Documentation was reviewed that showed that Emergency Action Levels (EALs) were reviewed with offsite authorities on August 28, 1984 and March 26, 1985, as required by 10 CFR Part 50, Appendix 3, IV.B. Attendance sheets showed that members of the Wisconsin Department of Emergency Government, Manitowoc County Emergency Government and the Kewaunee County Emergency Government attended these meetings where EALs were discussed. EPMP 3.4 is currently under revision to specify that these annual reviews will be conducted and adequately documented in the future. The above actions are considered to be acceptable to avoid a reoccurrence of this problem. This item is closed.

f. 264/84013-03; 301/84011-03 (Closed) NOV - Evaluation of Interface with State and Local Governments

Licensee performed annual audit of the PBNP emergency preparedness program (Audit Report No. A-P-85-04) in which the evaluation of interface with State and local governments was an attribute. This attribute is now a part of the annual audit checklist and will be addressed in all succeeding audits. This action should satisfy the requirements outlined in 10 CFR 50.54(t).

g. 266/84013-06; 301/84011-06 (Closed) Siren System Problems

Examination of the results of monthly fully sounded siren tests since August 4, 1984 showed that all sirens were operable the majority of the time. When sirens are found to be non-operational during the monthly test, they are promptly repaired. Further discussion of the siren system testing is contained in Section 5 of this report. This item is considered closed.

h. 266/84013-07; 301/84011-07 (Closed) Semi-Annual Shift Augmentation Drills

Chapter 8.0, Section 3.4.7 of the Point Beach Emergency Plan stated that "shift augmentation drills will be conducted semi-annually until such time that it is established that the shift augmentation goals have been reached for four consecutive drills at which time the frequency will be changed to annually. Including this information into the plan closes this item.

i. 266/84013-03; 301/84011-08 (Closed) Letter-of-Agreement

The licensee has obtained an updated Letter of Agreement from Doctor's Clinic, Ltd. which reaffirms their willingness to care for PBNP employees. The letter is dated August 10, 1984 and signed by S. Lawrence Kaner, M.D. This item is closed.

j. 266/84013-09; 301/84011-09 (Closed) Shift Augmentation

Chapter 5.0, Section 2.0 of the Point Beach Emergency Plan stated that augmentation would take place such that an emergency organization adequate to respond to the situation would be in place within one hour, with the goal being to accomplish augmentation within 30 minutes. Augmentation levels for management personnel were specified in Figures 5-4, 5-5, and 5-6 of the Plan. Although Figure 5-4 (Emergency Organization-Alert) included a note that the Technical Support Manager, I&C Supervisor, Chem Director, Health Physics Director, and Rad/Chem Tech have an augmentation goal of 30 minutes after declaration of an emergency of alert or greater, this corresponding note is not present in either Figure 5-5 (Emergency Organization - Site Emergency) or Figure 5-6 (Emergency Organization - General Emergency). Although this item is closed, the licensee should revise Figures 5-5 and 5-6 to be consistent with Figure 5-4.

k. 266/84013-10; 301/84011-10 (Closed) Evacuation of Non-Essential Personnel

Chapter 6.0, Section 5.1.1.d.2 of the Point Beach Emergency Plan stated that a plant evacuation would also be ordered upon the classification of a Site Emergency; however, it did not mention evacuation upon a General Emergency classification. Section 5.1.2 of EIPs 4.1, Revision 8 (Site Emergency - Immediate Actions) and

5.1, Revision 8 (General Emergency - Immediate Actions) specified that the plant be evacuated of non-essential personnel if possible by implementation of EPIP 6.2, Plant Evacuation; however, EPIP 6.2, Revision 6, did not list as one of the initial conditions the classification of a Site or General Emergency. Although the Plan doesn't address evacuation of non-essentials at a General Emergency, the immediate actions procedure does. Similarly, both immediate action procedures (Site and General Emergency) specify that EPIP 6.2 be implemented, although EPIP 6.2 initial conditions did not address the classification as a condition. Based on the above findings, although this item is closed, the licensee should provide consistency between the Plan and procedures, and between the immediate actions procedures (EPIPs 4.1 and 5.1) and EPIP 6.2.

1. 266/84016-03; 301/84014-02 (Closed) Radioactivity Levels in Vegetation and Soil Samples

EPIP 7.3.1 has been modified to include procedures for processing soil and vegetation samples. Also, an NBS-Traceable standard has been developed for use in the sample counting. Sample collection containers are now provided in the SBCC. Collection and handling soil samples is included in training requirements. These actions adequately address this NRC concern. This item is closed.

m. 266/84016-03; 301/84014-03 (Closed) Dosimetry for Offsite Emergency Support Personnel

EPIP 11.3 Section 4.3.1 has been modified to require that dosimetry be provided to offsite support personnel when they arrive at the gate when responding to emergency conditions. This item is closed.

3. Emergency Detection and Classification (82201)

The inspectors reviewed the Point Beach Emergency Plan and Emergency Plan Implementing Procedures (EPIPs) to determine the existence and adequacy of Emergency Action Levels (EALs) based on actual in-plant indications and offsite and on-site monitoring results and indications. The EALs contained in Appendix B of the Emergency Plan and in Table 1-1 of EPIP 1.1, specified plant conditions and listed possible in-plant indications (by annunciator number or meter indication) that correspond to available monitoring results and indicators.

A comparison check was performed of EPIP 1.1, Initial Classification, against Appendix 1, of NUREG-0654, Revision 1, to determine if suggested EALs of NUREG-0654 are included in EPIP 1.1. In addition, six Shift Superintendents and two Duty and Call Superintendents were walked through a hypothetical accident scenario requiring escalation to a General Emergency classification. The EPIPs were used to carry out the simulated actions required in response to the scenario.

The following weaknesses were noted in the above areas:

- a. A "sustained loss of onsite or offsite AC power capability (>15 minutes)" is classified as an Unusual Event. A station blackout for greater than 15 minutes is classified as a Site Emergency, while a station blackout for less than 15 minutes is not classified. The latter situation should be classified as an Alert since by definition, the purpose of an Alert is to assure that emergency personnel are readily available to respond if the situation becomes more serious.

In addition, a typographical error in this section exists in that "Indications Used" are listed in the "Initiating Conditions" column. This is a repeat of Open Item No. 266/84013-04; 301/84011-04.

- b. An example initiating condition for General Emergency in NUREG-0654 is the "loss of 2 of 3 Fission product barriers with a potential loss of 3rd barrier...." No discussion is provided in the Emergency Plan or EIPs dealing with Fission product barrier analysis to assist users in relating status of barriers to emergency classifications. Thus, an accident scenario such as a steam generator tube rupture with fuel damage is not considered in Table 1-1, EIP 1.1, nor is adequate guidance available to make a determination of the classification. Shift Superintendents were unable to relate loss of, or threats to, fission product barriers to various accident classifications except the situation where loss of all three barriers constituted a General Emergency.
- c. Category 5, Core Fuel Damage, Table 1-1, EIP 1.1 includes as an indication Item 4, "two of 3 containment high range area monitors for >15 minutes >4.7 E + 3 R/hr." as an Unusual Event. Calculations show that two fission product barriers would have to be breached to incur such dose rates in containment, but by definition, no fission product barriers are breached in an Unusual Event. Further, it may be desirable to indicate Containment High Range Area Monitor readings (in addition to the chemical analysis) that would be obtained for the Alert classification level of 300 μ Ci/cc dose equivalent I-131.

Based on the number of weaknesses noted in the EALs, the licensee should conduct a detailed review of their EALs correcting previously noted deficiencies. The licensee should consider incorporating fission product barrier analysis for classification as a complement to the upgraded (symptomatic based) EOPs and accident mitigation through fault-tree analysis.

Weaknesses noted in the EALs will continue to be tracked under 266/84013-04; 301/84011-04, with the exception of security-related EALs discussed in Section 11 as an Unresolved Item.

4. Protective Action Decisionmaking (82202)

The inspectors reviewed the PBNP EIPs to determine their organizational efficiency and accuracy in providing direction to emergency organization personnel. The areas concentrated on relative to Protective Action Decisionmaking included accident evaluation, formulation of protective action recommendations, and notification of offsite agencies.

Interviews and walkthroughs of six Shift Superintendents (SSs) and two Duty and Call Superintendents (DCSs) were conducted utilizing a detailed accident scenario that degraded plant conditions from an initial Alert classification to a General Emergency. In seven out of eight cases, persons interviewed could not make an adequate protective action recommendation after declaring a General Emergency due to a core melt sequence in progress, and conditions in containment of high temperature, pressure, and tens of thousands rem/hr dose rates. Confusion was noted in half of the Shift Superintendents, concerning the utilization of the dose projection procedure and dose projection model of the Radiation Monitoring System (RMS) with no releases yet occurring.

During walkthroughs with a postulated release occurring, hypothetical parameters of wind direction (from 055°), speed (5 mph), and stability class (F) were selected to permit personnel to demonstrate the Dose Projection model of the Radiation Monitoring System (RMS) computer. For the above parameters, the affected sectors were computed as "A, B, P, Q, and R," in at least two cases. These sectors were noted to be the north and northwest portions of the compass rose; however, the correct answer for the given parameters was the southwest quadrant. It was also noted that several personnel successfully operating the dose projection program failed to detect the apparent error in the "affected sectors."

SSs and DCSs were unaware of the contents of Appendix J to the Emergency Plan (Evacuation Time Estimates for the Area Surrounding the PBNP) and the implications of the relationship between plume transit time, plume duration time, and the time to evacuate the public in affected sectors. In formulating protective action recommendations based on the RMS dose model, SSs and DCSs failed to consider time and duration of the release, and evacuation times until prompted by the inspector. Since consideration of evacuation time estimates is required by Section 5.2.4 of EIP 1-5, guidance as to where to find this information should be incorporated into the procedure. (Open Item No. 266/85005-01; 301/85005-01)

Section 5.0 of Chapter 6.0 of Revision 22, dated January 25, 1985, to the Emergency Plan states in part that recommendations of protective actions to be taken offsite will be made only by the Emergency Support Manager, recognizing that at the beginning of an emergency evolution, the Shift Superintendent and/or DCS will have the responsibility and authority of the Emergency Support Manager. 10 CFR 50.54(q) states in part that a licensee authorized to possess and/or operate a nuclear power reactor shall follow and maintain in effect emergency plans which meet the standards of 50.47(b) of this part and the requirements in Appendix E to

this part. The fact that the Shift Superintendent could not make an adequate protective action recommendation is in noncompliance with the regulations. This is a repeat noncompliance from the July 23-27, 1984 routine inspection (Report No. 50-266/84013; 50-301/84011) and will continue to be tracked under Open Item No. 266/84013-02; 301/84011-02.

A review of the EIPs in conjunction with the walkthroughs led the inspector to conclude that inadequacies in the EIPs as opposed to insufficient training was the primary basis for the inability of the Shift Superintendents to make an adequate protective action recommendation. The list below contains a sample of the types of weaknesses noted in the procedures and walkthroughs:

- All Shift Superintendents that walked through a scenario were not familiar with and did not locate Attachment 1.5-3 to EIP 1.5, Flow Chart for General Emergency Offsite Protective Decisions, in attempting to make protective action recommendations until prompted by the inspector conducting the walkthrough. This is a repeat finding identified in the walkthroughs during July 1984.
- Section 5.1 of EIP 5.1, General Emergency - Immediate Actions, described the responsibilities of the Shift Superintendent. This procedure never specifies the Shift Superintendent as having the initial responsibility of the Emergency Support Manager to make a protective action recommendation, nor does it direct the Shift Superintendent to Attachment 1.5-3 of EIP 1.5. This is a repeat finding from the July 1984 inspection.
- Form EIP-13, Status Update Form is provided in the EIPs for use in updating offsite authorities on plant conditions and protective action recommendations. However, EIP-13 is not referenced in any of the EIPs, which means there is no guidance given concerning the responsibility for filling out the form and transmitting its contents. This is a repeat finding from the July 1984 inspection.
- In EIPs 5.1 and 5.3 dealing with a General Emergency classification, several persons are directed to fill out EIP-12, Initial Incident Report Form, including the Plant Operations Manager, Designee A and Designee B. Assigning three persons to fill out one form could lead to a duplication of effort, especially since the EIPs do not specify who appoints Designee A and Designee B, who they are, or where they are located. No clear statement is made in the Emergency Plan or the EIPs that the decision to notify is a non-delegatable responsibility of the Shift Superintendent/Plant Operations Manager. This is a repeat finding from the July 1984 inspection.
- Section 5.1.9 of EIP 1.8 directs the user to, "sum the values on EIP-34, Section 4.0, to determine the gross Xe-133 equivalent release rate." There is no Section 4.0 on EIP-34; it should state Section D.8. This is a repeat finding from the July 1984 inspection.

- Section D.9 of EPIP-34 indicates that a gross Xe-133 equivalent release rate can be computed from a grab sample. However, the procedure does not provide assumptions, conversion factors or formulas to accomplish this computation. This is a repeat finding from the July 1984 inspection.

Several organizational problems in EIPs were noted that caused difficulty for the SSs and DCSs during the walkthroughs. Some examples are noted below:

- Paragraph 5.1.7, EIP 5.1, General Emergency-Immediate Actions, directs the Shift Superintendent to perform the actions of the Plant Operations Manager (POM). The fourth step of this section (5.6) directs the POM to "Deescalate to a less severe class if conditions no longer warrant the General Emergency classification and complete Form EIP-12, "Initial Incident Report Form" attached to EIP 5.3, "General Emergency-Offsite Agency Notification." This reference to Form EIP-12 is the first reference to notification responsibilities of the Shift Superintendent after having to perform ten other steps, some of which may have less priority. As written, the step is not applicable for declaration of a General Emergency.
- When referred to completing Form EIP-12, "Initial Incident Report Form," a responsibility of the Shift Superintendent is to make protective action recommendations. No written sequence causes this to have been completed such that the information is available for filling in the correct answer.

As a result of numerous weaknesses identified in the EIPs, the licensee should undertake a comprehensive review of their EIPs to correct the above types of problems. This will continue to be tracked under Open Item No. 266/84013-05.

Based on the above review, one repeat violation was identified.

5. Notifications and Communications (82203)

The inspector reviewed the licensee's procedures for notifying onsite emergency response personnel and offsite agencies during an emergency situation. EIPs 2.2, 3.2, 4.2, and 5.2 specify the notification procedures for plant and corporate personnel for each of the four emergency classifications. Notification of State and local offsite agencies must be initiated as soon as possible after the Unusual Event classification and within fifteen minutes at the Alert, Site Emergency and General Emergency classifications. The Emergency Response Organization notifications are made by telephone. However, key personnel may be notified by the plant paging system which is described in EIP 14.2. The message forms to be used for notifying offsite emergency response personnel were examined and found to be adequate for both initial and follow-up status update reports.

Communication equipment in the emergency facilities were spotchecked for operability and found to be available and functional. A communications check of the Emergency Notification System (ENS) was performed and found to be acceptable. The licensee provided documentation that they have been performing a monthly check from each of the emergency response facilities on the ENS as required.

The inspector reviewed the licensee's procedures to ensure that communications equipment operability checks are also being performed for systems used to communicate with State and local emergency response organizations. These communication drills and checks which included both telephone and radio communications equipment, were being performed as required and adequately documented.

Discussions with licensee personnel determined that the Manitowoc County Sheriff's office conducts a full sound test of the six sirens in Manitowoc County on the first Saturday of each month. If any of the sirens are found to be inoperable, the Sheriff calls the licensee who has responsibility for maintaining the sirens. Records provided by the licensee showed that inoperable sirens had been repaired in a timely manner. (Sirens in Kewaunee County are tested monthly by the Kewaunee County Sheriff and maintained by Wisconsin Public Service Corporation.) A review of the siren tests determined that most of the problems with inoperable sirens noted in last year's routine inspection report (No. 266/84013; 301/84011) have been resolved.

Based on the above findings, this portion of the licensee's program is acceptable.

6. Changes to the Emergency Preparedness Program (82204)

The inspectors reviewed documentation related to changes in the Emergency Plan (EP) with regard to processing, distribution, and implementation. The following were observed:

The Point Beach Emergency Plan is classified by the licensee as "major" procedures. Changes to this plan require review by the Manager's Supervisory Staff and approval by the Plant Manager, and Manager - Nuclear Operations prior to release. The licensee's EPIPs are classified as "minor" procedures. Changes to these require only the approval of Emergency Preparedness supervision prior to release. This policy allows EPIPs to be issued without benefit of feedback from cognizant individuals prior to implementation. Changes to the EPIPs should be forwarded to individuals responsible for implementation of the procedure for review and comment prior to release.

The Emergency Preparedness section has added one member to its staff who will serve as the Emergency Preparedness Coordinator (EPC). The EPC will function under the newly created position of Licensing Engineer, which is now filled by the previous EPC. No decrease in the effectiveness of the emergency organization or emergency plan has occurred with this change.

No other major changes to the emergency program organizational structure or to the administration of the emergency preparedness program were identified.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following item should be considered for improvement:

- Revisions that are made in the EPIPs should be forwarded for review and comment to individuals responsible for implementation of the procedure prior to their final approval and release.

7. Shift Staffing and Augmentation (82205)

The inspectors reviewed the records of the shift augmentation drills conducted in January and September of 1984; reviewed Section 5 of the Emergency Plan; and reviewed Emergency Plan Maintenance Procedure 3.3, Drills & Exercises, Revision 0; Emergency Plan Implementing Procedure 14.2, Paging System Operation, Revision 4; and EPIPs 2.2, 3.2, 4.2, and 5.2, all Revision 2, which covered Plant and Company Personnel Notification for an Unusual Event, Alert, Site Emergency, and General Emergency, respectively. To date, no shift augmentation drills have been conducted during 1985.

The minimum shift staff, outlined in Figure 5-1 of the Plan, provides for four Auxiliary Operators, one Shift Superintendent, one Operating Supervisor, two Control Operators, one Duty Technical Advisor within ten minutes of the Control Room, and one Rad/Chem Technician on shift 88 hours per week. In addition, security personnel may be utilized to perform some of the communicator functions. This shift staff compliment is in accordance with that specified in the letter from NRC dated June 10, 1983, granting exemption from Table B-1 onshift staffing levels.

Shift augmentation is initiated by the Shift Superintendent contacting the Duty and Call Superintendent (DCS) via telephone or pager. All key emergency response personnel also have pagers and can be contacted via group codes so that a timely response can be made. The DCS then contacts a secondary Duty and Call Superintendent and a Duty and Call Chemistry and Health Physics Supervisor to discuss manpower needs. All supervisory personnel contacted by pager or through phone calls from the above Duty and Call personnel are then responsible for contacting working level personnel sufficient to respond to the emergency. This system is designed to achieve staffing goals such that the TSC can be activated within 30 minutes and the EOF activated within one hour of the decision to augment TSC staff. Records of the January and September 1984 drills indicated that sufficient personnel would have responded to the notification to meet the augmentation goals of Table B-1 of NUREG-0654, Revision 1. However, no drill has yet been conducted in 1985 even though Paragraph 3.4.7 of Section 8.0 of the Emergency Plan indicated such drills will be conducted semi-annually for the first four consecutive drills that are successful, and annually thereafter. Although the conduct of these drills was specified in the emergency plan, they were not described in EPMP 3.2, which was supposed to list all of the drills conducted by the licensee to meet plan requirements.

Call lists of personnel (Form-22 and Form-23) were reviewed on a quarterly basis in accordance with the emergency plan; however, there were no procedural provisions in the EPMPs to specify who had this responsibility, and the Emergency Planning Coordinator was not aware of who had this responsibility.

Based on the above findings, this portion of the licensee's program is acceptable; however, the following items should be considered for improvement:

- The licensee should specify in a EPMP who has the responsibility for emergency telephone number updates.
- Procedure EPMP 3.2 should be revised to address the implementation of the Shift Augmentation drill described in the Emergency Plan.

8. Knowledge and Performance of Duties (Training)(82206)

The inspector reviewed the licensee's emergency preparedness training program, including training course descriptions for various personnel training programs, lesson plans for the training courses, drills, quarterly training audit, and training records of selected key emergency response personnel. The licensee's training program requirements were specified in Section 3.1 of Chapter 8.0 of the Emergency Plan, and in Emergency Preparedness Maintenance Procedure 3.1. All Point Beach Nuclear Plant (PBNP) employees have been provided basic emergency response training during the General Employee Training Program. This training was comprehensive, and one of the best available since it addressed all actions that the employee must take from the onset of an emergency condition until that employee can return home. All personnel not assigned major emergency response duties were to be retrained biannually in the content of the Emergency Plan and EIPs. Personnel who are assigned major roles in the emergency response organization were to receive annual training on substantive changes in the Emergency Plan and EIPs. Personnel who are assigned major roles in the emergency response organization were to receive annual training on substantive changes in the Emergency Plan and EIPs in addition to participation in a drill for each position they may be assigned on a biennial basis. This drill program, although designed to be conducted on a biennial basis for each position an individual would occupy, should result in all individuals with major roles in the emergency response organization participating in at least one drill annually due to the number of positions most personnel are qualified to occupy. The inspector reviewed the drill scenarios used to train Control Room personnel and verified that they addressed all emergency actions these personnel were to take, including the responsibility to make a protective action recommendation upon declaration of a General Emergency. In addition, the lesson plan for this particular drill contained emphasis on procedure revisions to EIP 1.5, Revision 8, Protective Action Evaluation. Based on a review of the above, the inspectors determined that the lesson plans and drill scenarios were adequate, and that a training program had been established for emergency preparedness.

The licensee had provided annual training for offsite emergency support personnel in conjunction with the Kewaunee Nuclear Power Plant. The inspector reviewed records of this training session, which was held on August 28, 1984. The licensee also provided the opportunity for training for members of the media and general public in conjunction with Kewaunee Emergency Preparedness personnel.

Employee records were reviewed for the following positions: Control Room personnel, all Site Managers, all Emergency Site Managers, all Duty Technical Advisors, all Health Physics Directors, all Technical Support Managers, and all Plant Operations Managers. This review was conducted to verify that initial training and retraining were provided at the required frequency. Although Section 3.1 of Chapter 8.0 of the Emergency Plan stated that the training provided will be conducted such that annually all employees assigned major roles in the emergency organization will receive training on substantive changes in the Emergency Plan and EIPs, one of the Emergency Site Managers checked had not received any form of training since 1983. This was in spite of the fact that substantive changes to the Emergency Plan were made during 1984. (For example, changes made in revisions to the EIPs and Plan to date include bases which were previously not present on how protective action recommendations would be made for potential releases.) This finding was also identified by the licensee in their audit of the training program which was conducted March 18-21, 1985, and was documented as AFR #A-P-85-03-029. The licensee was in the process of developing corrective actions to address this audit finding, as required by the licensee's audit program. This violation would normally be a Severity Level IV violation, and is the first violation identified of its type, therefore, no corrective actions for previous violations were in place. Since this violation meets all of the tests specified in Section V.A of Appendix C to 10 CFR Part 2, no notice of violation will be issued for this noncompliance.

Although EPMP 3.1 stated that several types of training would be performed annually (e.g., Plant Supervisory Training Program, General Employee Training Program, Radiation Monitoring Team Training Program, and Accident Assessment Training Program), training staff personnel were surprised at the wording presented in the procedure. Apparently, training department personnel had not been involved in the development of the procedure they were required to implement; but rather, the procedure had been presented to them for implementation after it had been issued (see Section 6 of this report). In the interim, the training department had established a biennial frequency for training personnel in emergency preparedness activities. This biennial program, which was initially implemented in 1984, specified that drills would be held for each training as described above. In addition, the new Needs Analysis program which was to be implemented by the Training Department in June 1985, would identify training needs on significant changes to the EIPs as they occurred. This program should provide for training on significant changes to the EIPs on a more frequent basis than annually; however, the licensee still needs to develop a better method of determining how significant changes to the Plan will be addressed.

Walkthroughs were conducted with several members of the licensee's Emergency Response Organization. The results of these walkthroughs are documented throughout this report.

Based on the above findings, one item of noncompliance was identified. In addition, the following items should be considered for improvement.

- The licensee should address how annual training on significant changes to the Plan will be accomplished, especially for corporate personnel.
- Training personnel should be provided with the opportunity to provide input to procedure revisions affecting the conduct of the training program prior to procedure issuance.

9. Licensee Audits (82210)

The inspectors reviewed the annual audit of the PBNP Emergency Preparedness Program (EPP) (Audit Report No. A-P-85004) conducted on April 26, 1985, and responses to findings of the 1984 annual audit of the program.

The 1985 annual audit identified nine deficient or nonconforming items, concluding that "the EPP is adequate to assure emergency preparedness as it is currently documented and being implemented." While the audit did include an evaluation of the adequacy of interface with State and local governments, it was contained only in the audit attribute checklist. It was not specifically included in the audit report itself, even though commitment was made in correspondence to the NRC to do so (letter from C. Fay to J. Keppler dated October 19, 1984). This evaluation is kept at corporate headquarters and made available to the State and local governments on demand. Results of the audit were reported to plant and corporate management and will remain permanently in their records. Personnel involved in the audit were determined to have no direct responsibility for implementation of the emergency preparedness program.

Licensee-identified deficiencies and weaknesses discovered during licensee drills and exercises are adequately tracked under Procedure QAI-PD-7, "Documentation and Disposition of Observed Deficiencies." Respondents are provided 30 days from the date of the report to reply. Delinquent respondents are included in the Escalation Procedure QAI PD-7.1, "Obtaining Corrective Action Responses." After an additional 30 days, delinquents are brought to the attention of the Vice-President, Nuclear. It was noted, however, that response to some of the audit findings of the 1984 audit was not done in a timely manner. For instance, the response to Audit Item Nos. A-49-84 and A-50-84 was not completed until 4 1/2 months after the requested response due date. For Audit Item Nos. Q-83-83 and Q-84-83, the response was not provided until over 10 months after the requested due date.

Based on the above findings, this portion of the licensee's program is acceptable. However, the following items should be considered for improvement:

- The part of the annual emergency preparedness review involving the evaluation for adequacy of interface with State and local governments should be made a specific item within the body of the annual report.
- Copies of the part of the review involving State and local governments should be mailed to the cognizant governmental offices.

10. Maintaining Emergency Preparedness

A review was made of the licensee's Letters-of-Agreement with offsite groups and agencies. All letters were observed to have been updated within the last year. In addition, the letters adequately addressed the scope of support each of the groups and agencies was expected to provide.

An examination was made of the documentation of the following drills required by the Emergency Plan and Emergency Plan Maintenance Procedure (EPMP) 3.3: Communication drills, Medical Emergency drills, Radiological Monitoring and Health Physics drills, Chemistry drills, Site Accountability and Evacuation drills, and Search and Rescue drills. A check of the dates on which the drills were conducted determined that all were within the frequencies required by the Emergency Plan and procedures.

EPMP 1.1 and 1.2 specify the scheduling for routine checks, maintenance, calibrations, and inventories for health physics emergency plan equipment. A review of the documentation for most of the above checks, maintenance, calibrations and inventories conducted since January 1, 1985 determined that all were being carried out as required. The records showed that any time inventories were short the required quantities, the supplies were replenished in a timely manner.

However, discussions with the licensee and a spotcheck of one emergency cabinet determined that copies of the inventory sheet of each kit or storage cabinet was not contained in that kit or cabinet. If this were done, then an individual searching through the kit or cabinet for supplies could easily determine if the needed items were contained there, and/or how many of the items should be available. This will be tracked under Open Item No. 266/85005-02; 301/85005-02. A spotcheck of the instrumentation contained in the cabinet examined determined that they had updated calibration stickers, and the calibration dates would not expire prior to the next scheduled inventory.

Based on the above findings, the following item should be addressed:

- A copy of the applicable inventory list should be included in each emergency kit or cabinet.

11. Unresolved Item: 266/85005-03; 301/85005-03

The Point Beach Emergency Plan contains Emergency Action Levels (EALs) that provide no emergency classification for security threats. Instead, the EALs reference the Modified Amended Security Plan (MASP). However, a review of the MASP indicated that it makes no provision to classify security threats. NUREG-0654, Revision 1 specifies a security threat as an Unusual Event, ongoing security compromise as an Alert, imminent loss of physical control of the plant as a Site Area Emergency, and loss of physical control of the facility as a General Emergency. None of these classifications are made in the EALs or MASP.

This item is currently being reviewed by the NRC and will remain unresolved pending the outcome of this review. (This item is no longer being tracked as part of Open Item No. 266/84013-04; 301/84011-04, but will be tracked as Item No. 266/85005-03; 301/85005-03).

12. Unresolved Items

Unresolved items are matters about which more information is required in order to ascertain whether they are acceptable items, weaknesses, items of noncompliance, or deviations. An unresolved item disclosed during this inspection is discussed in Section 11.

13. Exit Meeting

The inspectors and the Chief of the Emergency Preparedness Section from NRC Region III met with the licensee representatives (denoted in Section 1.0) at the conclusion of the inspection on May 9, 1985. The inspectors summarized the scope and findings of the inspection, including the noncompliances and open items. The licensee committed to taking prompt corrective action concerning the repeat noncompliance regarding protective action recommendations by revising applicable procedures within two weeks and retraining all Shift Superintendents on the revised procedures within one additional week. The inspectors also discussed the contents of the report to determine if the applicant thought any of the information was proprietary. The applicant responded that none of the information should be proprietary.