

APPENDIX

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/85-09

License: DPR-46

Docket: 50-298

Licensee: Nebraska Public Power District
P.O. Box 499
Columbus, Nebraska 68601

Facility Name: Cooper Nuclear Station

Inspection At: Cooper Nuclear Station, Brownsville, Nebraska

Inspection Conducted: March 4-8, 1985

Inspector: J. B. Baird
for/ C.A. Hackney, Emergency Preparedness Analyst

4/24/85
Date

Other Accompanying Personnel:

M. I. Good, Comex Corporation

Approved: J. B. Baird
J.B. Baird, Chief, Emergency Preparedness Section

4/24/85
Date

J. P. Jaudon
J. P. Jaudon, Chief, Project Section A,
Reactor Project Branch 1

5/9/85
Date

Inspection Summary

Inspection Conducted March 4-8, 1985 (Report 50-298/85-09)

Areas Inspected: Routine, unannounced inspection of selected portions of the emergency preparedness program. The inspection involved 82 inspector-hours onsite by two NRC inspectors.

Results: Within the areas inspected, no violations or deviations were identified.

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DETAILS

1. Persons Contacted

NPPD

D. Whitman, Technical Staff Manager
*P. R. Windham, Emergency Planning Coordinator
*C. Goings, Regulatory Compliance Specialist
R. Drier, Emergency Plan Training
*P. Thomason, Division Manager, Nuclear Operations
T. Ratzlaff, Shift Supervisor
M. Ward, Senior Reactor Operator
M. Edgerton, Shift Supervisor
L. Cade, Senior Reactor Operator
J. Boyd, Shift Supervisor
D. Kuser, Senior Reactor Operator
D. Shrader, Shift Supervisor
D. Dea, Senior Reactor Operator
D. Clifton, Administration
J. Dunn, Document Specialist
J. Sayer, Technical Radiological Advisor
*D. Reeves, Training Manager
*R. Gibson, Quality Assurance Specialist

NRC

*D. DuBois, Senior Resident Inspector

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (50-298/8113-40) - The licensee had revised Emergency Preparedness Implementing Procedure (EPIP) 5.7.17 to include using real time meteorological information in the radiological assessment program. This item is considered closed.

(Closed) Open Item (50-298/8113-69) - The licensee had developed a training program for offsite support personnel and conducted training sessions. This item is considered closed.

(Closed) Open Item (50-298/8321-01) - The public information department had been assigned responsibility for maintaining the emergency brochure. This item is considered closed.

(Closed) Open Item (50-298/8321-03) - Corporate telephone numbers and titles had been updated. This item is considered closed.

(Closed) Open Item (50-298/8321-04) - Key general office personnel had been assigned pagers for off-duty hours. This item is considered closed.

(Closed) Violation (50-298/8327-01) - The licensee revised the procedure for the emergency preparedness program review. The NRC inspector noted that the report contained the key elements required by 10 CFR 50.54(t). This item is considered closed.

3. Protective Action Decisionmaking

The NRC inspector reviewed the Cooper Nuclear Station (CNS) Emergency Plan (EP) and EIPs with emphasis on reviewing the licensee's method of making timely specific protective action recommendations based on an assessment of emergency conditions within the plant. In addition, eight senior licensed operators comprising four shifts, including shift supervisors, were given control room walkthroughs to determine adequacy of training and performance of duties when presented with various simulated plant conditions and situations.

The CNS emergency planning coordinator accompanied an inspector during one set of walkthroughs. Procedures and checklists were observed to have been consulted and followed. Selected key offsite notification telephone numbers were verified by the NRC inspector against the CNS emergency telephone directory.

The following observations were made by the NRC inspectors during the operations walkthroughs:

- None of the licensed shift personnel were familiar with their nondelegatable responsibilities. The NRC inspector determined that the EIPs did not list nondelegatable responsibilities.
- Most of the licensed shift personnel had difficulty in utilizing their EIPs and arriving at timely and proper protective action recommendations. The NRC inspector determined by a review of operations personnel training records that most operators had not received emergency preparedness training in at least 8 months.
- Four of the eight personnel given walkthroughs had to be prompted to make protective action recommendations for a general emergency declared due to loss of physical control of the facility. The scenario called for the control room to have been occupied by an outside force without any prior notice. The operators used EPIP 5.7.01, item 11.4, to classify the event. The EPIP used did not address a situation where only the control room was occupied by an outside force.

- None of the shift personnel were familiar with the 15 minute notification requirement for state and local governments. The NRC inspector noted that the 15 minute requirement of 10 CFR 50, Appendix E.VI.D.3, was addressed in the EP but was not addressed in the EIPs.

EPIP 5.7.6, "Notification," Revision 4, was not entirely consistent with regulatory requirements regarding notification of the NRC in an emergency. The EPIP stated that the NRC notification must be made within 1 hour. 10 CFR 50.72 requires that the licensee "shall notify the NRC immediately after notification of the appropriate state or local agencies and not later than 1 hour after the time the licensee declares one of the emergency classes."

During a walkthrough of the notification procedures in the control room, the Nebraska State Patrol could not be contacted using the 24 hour commercial telephone line. Contact was made using the Nebraska State Patrol hotline. A subsequent investigation by the licensee determined that the telephone lineup at the state patrol office had apparently not been properly shifted at the completion of the normal work day. The lineup was corrected by the state patrol and a communication test was satisfactorily completed.

Based on observations by the NRC inspectors during the walkthroughs, the following items are considered to be emergency preparedness deficiencies:

The EIPs did not address nondelegatable authorities and responsibilities. (50-298/8509-01)

The licensed shift personnel lacked familiarity with their EIPs in the areas of emergency detection, classification, and protective action recommendations. (50-298/8509-02)

The EIPs did not address notifying the state and local governments within 15 minutes after declaration of an emergency. (50-298/8509-03)

Based on observations in this area, the following items should be considered for improvement:

(Open) Open Item (50-298/8509-04) - Revise the EP and EIPs to reflect 10 CFR 50.72 NRC notification requirements.

(Open) Open Item (50-298/8509-05) - During shift supervisors' and operators' training, include discussions pertaining to security EALs.

(Open) Open Item (50-298/8509-06) - Revise procedures to include human factors considerations, e.g., color coded tabs with designated names for each procedure.

(Open) Open Item (50-298/8509-07) - Consider using "precautions" in procedures to alert user, e.g., notification to state(s) must be made in 15 minutes.

(Open) Open Item (50-298/8509-08) - Consider having quarterly operations drills using plant problem scenarios as a part of training.

No violations or deviations were identified.

4. Changes to the Emergency Preparedness Program

The NRC inspectors reviewed the EP, EIPs, and other available documentation with regard to making changes to the emergency preparedness program. An inspection of the control room and emergency response facilities was also conducted to compare the physical configuration to the specified configuration in the EP and procedures.

It was not evident from documentation presented to the NRC inspectors that all changes to the EP and EIPs had been specifically reviewed to meet the requirements of 10 CFR 50.54(q). The EP and EIP changes had been submitted to the station operations review committee for approval; however, that approval lacked documentation to indicate whether 10 CFR 50.54(q) was considered. CNS Procedure .3, "Station Operations Review Committee," (SORC) did not indicate any responsibility with regard to reviewing changes to meet the requirements of 10 CFR 50.54(q). The NRC inspector reviewed documents which indicated that the CNS plan and the state's plan had been compared for compatibility.

Facility inspections indicated that emergency response facilities were not configured as specified in the EP and EIPs. In addition, some emergency equipment was found to be obstructed due to normal utilization of these emergency spaces. This included a status board in the TSC and the health physics network (HPN) telephone in the emergency operations facility (EOF), which was found on the floor behind a box with the receiver off the hook. A subsequent test by the NRC inspectors determined the telephone was not working. This was reported to a licensee representative. Further, during the emergency response facility review, the NRC inspectors toured the personnel and small equipment monitoring station and noted several plastic bags containing material on a table and approximately 20 cigarette butts on the floor. The NRC inspectors discussed these observations with station management. The area was subsequently cleaned and a "no smoking" sign was posted in the area.

Based on observations in this area, the following items should be considered for improvement:

(Open) Open Item (50-298/8509-09) - Include 10 CFR 50.54(q) review acknowledgement in the emergency plan and procedure review change procedures.

(Open) Open Item (50-298/8509-10) - Maintain all emergency response facilities and equipment in a state of readiness as indicated in the EP and EIPs.

No violations or deviations were identified.

5. Knowledge and Performance of Duties (Training)

The NRC inspectors reviewed the training program and EP Training Manual as described in the EP, Section 8.0, "Training Program." Some programmatic problems were noted in the review of program documents. For example, the EP Training Program Manual had superseded the EP Training Program and the change was not reflected in the EP.

In addition, there was disagreement between some titles of key emergency response personnel in the EP and the EP Training Manual. This disagreement resulted in not showing a requirement for the Division Manager, Nuclear Operations (old title - station superintendent) and Technical Staff Manager (old title - assistant to station superintendent) to be trained in emergency response duties; however, both had been trained as verified by their training records.

The training matrix in the CNS EP Training Program did not address emergency response training for the CNS emergency planning coordinator (EPC). The CNS EPC has key emergency response organization duties as part of the TSC organization. Section 8.0 of the EP specified that training for the CNS EPC is provided by participation in industry sponsored emergency planning symposia and workshops, as well as observing the exercises of other utilities; however, this training did not appear to be adequate for this specifically defined role as a coordinator within the TSC organization during an emergency. The CNS EPC did conduct portions of the initial specialized and periodic retraining for members of the emergency response organization.

The training program being used to train emergency response organization personnel was not consistent with the program promulgated by the CNS EP. The following inconsistencies were identified:

- Figure 8.1-1, Section 8.0 of the Plan is not consistent with the EP training matrix in Section 1 of the Emergency Plan Training Program Manual.

- Emergency Plan Training Program Manual, Section 1, states: "non-NPPD personnel will not be tested." The licensee stated NPPD personnel are being tested.
- Lesson plans in the Emergency Plan Training Program Manual are not being used. They have been replaced by updated lesson plans which are not part of the training manual.

The NRC inspector discussed the present training program and determined that there had recently been changes to the training modules and the new changes would be reflected in the next change to the EP and EIPs.

The NRC inspectors reviewed the required reading program that was being used to promulgate changes to the EIPs. The distribution system for required reading appeared to follow the normal management chain; however, the operations staff who should be aware of EP and EIP changes were on the end of the distribution chain. The result was evidenced during walkthroughs which indicated that operators were unfamiliar with some recent changes to the emergency preparedness program.

Training program procedures did not appear to require that all training shall provide for formal critiques as required by 10 CFR 50, Appendix E, paragraph IV F.3. The CNS EP training program encourages training critiques but does not require critiques. Critiques for exercises and drills did not appear to be formally documented; however, the licensee had informal critique documentation. The annual exercise deficiencies/concerns had been transferred to an automated regulatory compliance tracking system and assigned to responsible managers for review and resolution. The actions taken by the licensee to close out several of the items reviewed appeared adequate.

Based on observations in this area, the following items should be considered for improvement:

(Open) Open Item (50-298/8509-11) - Provide appropriate training for the EPC compatible with his position in the TSC organization.

(Open) Open Item (50-298/8509-12) - Review distribution list for EIPs and assign priority to the required reading list.

(Open) Open Item (50-298/8509-13) - Require formalized critiques for all training.

(Open) Open Item (50-298/8509-14) - Revise the EP and EIPs to reflect the current CNS emergency preparedness training program.

No violations or deviations were identified.

6. Licensee Audits

The NRC inspectors reviewed QAP-1900, Revision 7, dated February 21, 1984, review titled "50.54(t) Evaluation 1984;" QAP-1900 Emergency Plan Audit No. 84-10; and Emergency Evaluation Reports dated December 30, 1983, April 16, 1984, September 13, 1984 and September 27, 1984. Further, the NRC inspectors met with selected members of the station staff to discuss the 50.54(t) evaluation methodology and reports. The NRC inspectors reviewed the evaluation material which consisted of meeting records, letters, training records, and checklists. The NRC inspectors noted that the 50.54(t) evaluation was difficult to follow and further noted that several areas were not addressed. For example, item *B on sheet 10 of QAP 1900A regarding effectiveness of training was found to be blank.

The CNS evaluators had interface meetings with representatives from the state of Nebraska on December 14, 1983 and the state of Iowa on December 15, 1983. The NRC inspector reviewed letters dated January 6, 1984, addressed to the states of Missouri, Iowa, Kansas and Nebraska, containing a copy of the emergency preparedness evaluation document. The NRC inspectors noted that the September 24, 1984, emergency preparedness evaluation contained the key elements as stated in 10 CFR 50.54(t).

Based on observations in this area, the following item should be considered for improvement:

(Open) Open Item (50-298/8509-15) - Formalize an emergency program review document and checklist for the 50.54(t) review.

No violations or deviations were identified.

7. Exit Interview

The exit meeting was held on March 8, 1985, at the CNS administration building. The meeting was conducted by Mr. Charles A. Hackney, Emergency Preparedness Analyst, NRC, Region IV. Mr. Dennis L. DuBois, Senior Resident Inspector, NRC, was in attendance. The licensee was represented by Mr. Paul V. Thomason, Division Manager of Nuclear Operations and his staff. The NRC inspector discussed the emergency response facility status with the Division Manager of Nuclear Operations and summarized the findings of the inspection.