



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

June 21, 1985

VPNPD-85-19
NRC-85-5

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Att: Mr. C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Protection Branch

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
INSPECTION REPORT NOS. 50-266/85005 (DRSS)
AND 50-301/85005 (DRSS)
EMERGENCY PREPAREDNESS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated May 22, 1985 forwarded IE Inspection Report Nos. 50-266/85005 and 50-301/85005. These reports described the results of a routine unannounced safety inspection conducted by members of your staff on May 6-9, 1985, at the Point Beach Nuclear Plant, Units 1 and 2. Also enclosed with your letter were Appendix A, "Notice of Violation", and Appendix B, "Emergency Preparedness Weaknesses". We were requested to submit, pursuant to 10 CRF 2.201, a written statement regarding the actions we have or are taking regarding the Appendix A violation.

The noncompliance cited in Appendix A concerns the inability of Shift Superintendents, using Point Beach Nuclear Plant (PBNP) Emergency Plan Implementing Procedures (EPIPs), (03-22-85), to determine when and what types of protective measures should be considered for a specific accident scenario. The non-compliance is being tracked under Open Item Nos. 266/84013-02 and 301/84011-02.

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At the inspection exit meeting on May 9, 1985, Wisconsin Electric Power Company made a commitment to promptly address the above matter. Embodied in the commitment was a revision of applicable procedures within two weeks, a subsequent retraining of all Shift Superintendents (to be completed by the end of the third week following the exit meeting), and performance of a followup "Quality Assurance type" evaluation.

The following is a description of the corrective actions taken or in progress to meet the exit meeting commitment and resolve the noncompliance.

1. An ad hoc committee, comprised of Shift Superintendents, the Emergency Plan Coordinator, the Regulatory Engineer, selected PBNP Training staff, and other management personnel, met for the purpose of identifying problem areas in the EPIPs which lead to the difficulties which Shift Superintendents experienced in determining protective action measures. Corrective measures were discussed. It was determined that the most effective and expedient way to resolve the problem was to develop a new procedure for use by the Shift Superintendent during the initial period of an emergency event when he is the acting Emergency Support Manager and has protective action determination responsibilities.
2. A procedure (EPIP 1.1, Rev. 0, "Plant Operations Manager Initial Response"), was developed. The procedure was written in essentially the same format as the PBNP Emergency Operation Procedures (EOPs) which are scheduled to go into effect on July 1, 1985. This is a format which is familiar to the Shift Superintendents. The logic based procedure systematically directs the decision making process and minimizes references to other procedures. The procedure's primary intent is to assure accurate and timely classification of an emergency event, adequate protective action determination, and prompt notification of offsite agencies.
3. The draft procedure (EPIP 1.1, Rev. 0, "Plant Operations Manager Initial Response"), was routed to Shift Superintendents and the management staff for review and comment. A subsequent draft of the procedure was reviewed and approved by the Manager - PBNP and the Manager's Supervisory Staff on May 23, 1985.

4. Six training sessions were conducted between May 24, 1985 and May 30, 1985. Thirty-seven individuals were trained in the use of EPIP 1.1, Rev. 0, and associated changes in the remaining EPIPs. The training roster included all Shift Superintendents, all non-Shift Superintendent Senior Reactor Operators (SROs), all Duty & Call Superintendents (DCSs), and all Duty Technical Advisors (DTAs).
5. Following training on the new procedure, all trainees were evaluated on its use. The evaluation included four components: one short answer test and three emergency event scenarios requiring use of the new procedure.
6. Test results indicated that, in some cases, retraining was necessary. PBNP-Training initiated a remedial program for all trainees exhibiting unsatisfactory performance on any one of the four test components. This remedial training and retesting is to be completed by June 26, 1985.
7. The May 24-30, 1985 training sessions included a trial use of the new procedure. Users of the procedure provided input on improving the clarity and human engineering aspects of the procedure. Appropriate comments and suggestions will be incorporated into a first revision of EPIP 1.1 which is expected to be distributed in June, 1985.
8. The next full training cycle for control room operators begins on June 17, 1985 and concludes six weeks later. That training cycle will include a component which addresses the process of protective action determination using the new and revised procedures.

Future noncompliance in this regard will be avoided by the implementation of Section 8.0, "Maintaining Emergency Preparedness", of the Point Beach Nuclear Plant Emergency Plan.

Full compliance was achieved with the completion of training and concurrent distribution and installation of EPIP 1.1, Rev. 0, and associated EPIP changes on May 30, 1985. The final phase of our commitment (a "Quality Assurance type" evaluation) will be completed prior to our September 10, 1985 observed emergency exercise.

The inspection report indicated that "...inadequacies in the EIPs as opposed to insufficient training was the primary basis for the inability of the Shift Superintendents to make adequate protective action recommendations". Six weaknesses were cited.

The six weaknesses cited were based upon a review of the EIPs conducted by your staff prior to the May 6-9, 1985 inspection. The NRC Senior Resident Inspector, R. L. Hague, verified that the EIP review was conducted using the controller copy held by the USNRC at the Glen Ellyn office. It appears, based on the weakness cited, that the copy of the EIPs used for the review has not been properly updated. Our records indicate that copies of EIP revisions (dated March 22, 1985), were mailed to the USNRC on March 27, 1985. The signed receipt which we hold for the USNRC Region III copy is dated May 8, 1985. Many of the weaknesses cited had been addressed in the March 22, 1985 EIP revision. Our responses to the specific weaknesses are as follows:

1. Weakness: "All Shift Superintendents ... did not locate Attachment 1.5-3 to EIP 1.5, 'Flow Chart for General Emergency Offsite Protective Decisions'...

Response: Attachment 1.5-3 is referenced in EIP 1.5, Section 5.2.3 (March 22, 1985 revision). In the May 24, 1985 EIP revision, the Flow Chart for General Emergency Offsite Protective Decisions has been integrated into the procedure (EIP 1.1, Rev. 0, "Plant Operations Manager-Initial Response"), which would be used by the Shift Supervisors. Hence, the weakness had been corrected.

2. Weakness: Section 5.1 of the EIP 5.1, "General Emergency-Immediate Actions", does not specify that the Shift Superintendent has the initial responsibility of the Emergency Support Manager to make a protective action recommendation, nor does it direct him to Attachment 1.5-3 of EIP 1.5.

Response: Section 5.1.10 of EIP 5.1, "General Emergency-Immediate Actions", instructs the Shift Superintendent to "Perform actions of the Plant Operations Manager until properly relieved". The Plant Operations Manager instructions in the EIP (Section 5.6.6) read, "If the Emergency Support Manager is unavailable, provide recommendations for the public to State and local authorities..." A reference to EIP 1.5, "Protective Action Evaluation" is included in that section. Hence, the weakness had been corrected.

3. Weakness: Form EPIP-13, "Status Update Form", is not referenced in any of the EIPs, which means that there is no guidance concerning its use and transmittance.

Response: This was corrected in the March 22, 1985 revision of the EIPs. Additional guidance concerning the use of Form EPIP-13 will be added to the EIPs by August 31, 1985.

4. Weakness: In EIPs 5.1 and 5.3, several persons are directed to fill out Form EPIP-12, "Initial Incident Report". No clear statement is made that the decision to notify is a non-delegatable responsibility of the Shift Superintendent/Plant Operations Manager.

Response: This problem was resolved in the March 22, 1985, revision of the EIPs. EIP 5.1 and 5.3 assign the responsibility for the completion of Form EPIP-12 to the Shift Superintendent. Other than the Plant Operations Manager who completes the EPIP-12 for event reclassification, no other person is assigned the responsibility. A statement regarding the decision to notify, as a non-delegatable responsibility, will be included in the Emergency Plan and the EIPs by August 31, 1985.

5. Weakness: Section "D" of Form EPIP-34 is improperly referenced as Section 4.0.

Response: This problem was resolved in the March 22, 1985 revision of EIP 1.8. Hence, this weakness had been corrected.

6. Weakness: EIP 1.8, "Emergency Offsite Dose Estimations" does not provide the required formula, conversion factors, or assumptions required to calculate release rates using a grab sample.

Response: Because of the large amount of time necessary to acquire and process a grab sample, particularly during adverse radiological conditions, the use of grab sample results in determining offsite dose and dose rate projections for the purposes of event classification and protective action evaluation is deemed impractical. Therefore, the reference to grab sample will be deleted from EIP 1.8 by August 31, 1985.

In addition to the weaknesses cited above, the inspection report identified two organizational problems within the EPIPs.

1. Problem: In EPIP 5.1, "General Emergency-Immediate Actions", the first Shift Superintendent reference to notification responsibilities, Form EPIP-12, appears in the Plant Operations Manager portion of that procedure. In addition, the Shift Superintendent has ten steps, some of lower priority, which precede the notification responsibility.

Response: This problem was addressed in the March 22, 1985 revision with additional clarity added in the May 24, 1985 revision. The current revision of the EPIPs contains the new procedure, EPIP 1.1, "Plant Operations Manager-Initial Response", which is used by the Duty Shift Superintendent until being relieved by the Plant Operations Manager. This procedure directs the decision making and task performance process to the end that expeditious notification of offsite agencies is accomplished. In addition, initial response duties for the Shift Superintendent for all emergency classifications (EPIPs 2.1, 3.1, 4.1 and 5.1) were reordered to reflect required performance sequencing and priority criteria. Hence, this organizational weakness has been corrected.

2. Problem: No written sequence directs the DSS to acquire the information necessary to fill out Form EPIP-12, "Initial Incident Report Form".

Response: The weakness has been corrected with the implementation of EPIP 1.1, Rev. 0, "Plant Operations Manager Initial Response". Hence, this organizational weakness has been corrected.

The weaknesses indicated above are being tracked under Open Item No. 266/84013-05. We believe these should be closed as indicated.

For your records, please note that the references to EPMP 3.2 on Pages 11 and 12 of the inspection report should instead be EPMP 3.3.

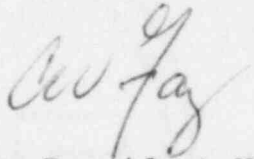
Mr. J. G. Keppler

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June 21, 1985

One "Unresolved Item" was identified in the inspection report. This item concerns the inclusion of specific security threats as criteria for emergency action level (EAL) classification. The Wisconsin Electric Power Company response to this item is contained in Appendix A of this letter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Fay".

Vice President-Nuclear Power

C. W. Fay

Attachment

Copy to NRC Resident Inspector

APPENDIX A

UNRESOLVED ITEM NUMBERS: 266/85005-03; 301/85005-03

Since 1980, the question of how security emergencies mesh with the Emergency Plan has been a recurring point of difference between the USNRC and Wisconsin Electric Power Company. Some historical perspective is warranted.

When the post-TMI Emergency Plan for PBNP was first reviewed by the USNRC on May 21-22, 1980, Mr. Axelson was the NRC team leader. His report, dated June 3, 1980, was silent on the issue of security. In the Summary of Findings (Item 10), Mr. Alexson noted specific initiating conditions which had not been addressed in the PBNP Emergency Plan. Security threats were not listed among them. The issue, however, had been discussed with him during the technical review session. The understanding reached at that time was that security emergencies are best handled under the security plan. Nonradiological emergencies (e.g., security threats) should not be addressed in an Emergency Plan which, of course, was developed specifically for the purpose of directing a response to a radiological emergency. Wisconsin Electric did agree to put a note in the emergency action level (EAL) classification table referring security threats, as initiating conditions, to the modified amended security plan (MASP). Although MASP is not part of the Emergency Plan, Mr. Axelson agreed that it was an appropriate vehicle for notification and response to security events. He also agreed that our approach demonstrated that security events are adequately addressed at PBNP. As a result of this understanding, there was no intent on our part to submit to the NRC any changes to the MASP.

Nothing has occurred since our meeting with Mr. Alexson which has caused us to change our position on the question of security events as they relate to emergency planning. Wisconsin Electric has actively involved local law enforcement agencies (LLEA) and the FBI in drills and discussions related to the PBNP security plan response. It is quite clear that the professionals in the security field agree that during a security event, the fewer non-security personnel involved, the better. To illustrate this point, consider the following: In an Emergency Plan response, many employees and some nonemployees are required to report to the plant site. The large number of people arriving at the site would significantly compound security problems. With the increased number of personnel at the plant site, Emergency Plan response personnel and LLEA would be in danger of being mistakenly identified as intruders or terrorists. In addition, as you know, the Emergency Plan identified predesignated assembly areas. Intruders familiar with the Emergency Plan could take advantage of the response it invokes and subdue a majority of the plant staff by merely controlling the assembly points. This would create a potentially dangerous and disadvantageous hostage situation.

An alternate to the inclusion of security events as initiating conditions for EAL classification would be to have a separate Emergency Plan response for security situations. There are two problems associated with that approach:

1. A copy of the PBNP Emergency Plan resides in the public document room (PDR). Therefore, any alternate security event response plan would remain available to potential terrorists.
2. Having an alternate emergency response for security events under the Emergency Plan escalates the potential for miscommunication and confusion, particularly if the purpose of a given Emergency Plan actuation is not understood by everyone involved.

Another important consideration, particularly from the perspective of the LLEA, involves the activation of notification systems associated with an Emergency Plan response. By procedure, at given EALs, the licensee is required to make certain announcements and notifications (e.g., notification of event classification to State and County agencies via NAWAS, or plant evacuations via Gai-tronics). Because the LLEA may prefer to curtail general announcements, the licensee may be required to violate procedure and/or statutory requirements and risk NRC citation. In that light, in order to maintain statutory compliance, the licensee may find it necessary to disregard the directives of the security professionals in charge of the security threat response by making the required announcement and notifications. The latter option would have a negative impact on the overall security response.

We believe that separation of security plan response from Emergency Plan emergency action levels is a sound incident management decision. Therefore, we do not intend to incorporate the suggested security EALs into our Emergency Plan. If you have any further questions on this matter, please contact us.