

October 23, 1996

EA No. 96-407

Mr. Ted C. Feigenbaum
Executive Vice President and
Chief Nuclear Officer
Northeast Utilities Service Company
c/o Mr. Terry L. Harpster
P.O. Box 270
Hartford, CT 06141-0270

SUBJECT: NRC-EVALUATED EMERGENCY PREPAREDNESS EXERCISE -
HADDAM NECK PLANT; INSPECTION REPORT NO. 50-213/96-07

Dear Mr. Feigenbaum:

This letter refers to the NRC-graded, biennial, emergency preparedness exercise inspection led by Mr. J. Lusher, at Haddam Neck Plant, Haddam, Connecticut, during the week of August 13, 1996. The inspection evaluated the performance of your site emergency response organization (SERO) during the August 14, 1996, Haddam Neck, full-participation exercise. The inspectors discussed the findings of this inspection with Mr. J. LaPlatney and others of your staff on August 16, 1996.

During the exercise, two weaknesses were observed: 1) failure to recognize the need for an Alert declaration early in the exercise (which consequently was prompted by the lead controller) and confusion with the use of emergency action level tables prior to the declaration of the General Emergency; and 2) failure to implement protective actions for the SERO at the Emergency Operations Facility and site personnel, and consider protective action recommendations beyond the 10 mile emergency planning zone, based upon the dose projections used in support of those protective actions.

We also observed that: 1) the overstaffing of key SERO positions with two and three individuals very early in the exercise caused confusion and problems for other individuals initially assigned to the SERO, and made it extremely difficult for the NRC inspectors to assess the performance of the SERO as described in your emergency plan and implementing procedures; and 2) the over-staffing also affected our ability to assess the SERO in the area of effective communications within and among the emergency response facilities and with the State. The overstaffing issue severely limited our ability to determine if the SERO could effectively implement the emergency plan and implementing procedures. The exercise revealed weaknesses that need to be addressed rigorously.

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At the completion of your staff's critique, your staff committed 1) to take timely and appropriate corrective action for the weaknesses identified, 2) to have a management meeting at the NRC Region I office to discuss those corrective actions, and 3) to perform a drill onsite of sufficient scope to demonstrate the effectiveness of those corrective actions prior to the restart of the Haddam Neck Plant.

Based on the results of this inspection, and in particular, the repetitive nature of the two exercise weaknesses that were identified, those weaknesses are being considered for enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. Those weaknesses potentially constitute violations of 10 CFR 50.47(b) and Appendix E. Accordingly, no Notice of Violation is presently being issued for these inspection findings because we plan to discuss these weaknesses with you during a pre-decisional enforcement conference. The decision to hold a predecisional enforcement conference does not mean that the NRC has determined that a violation has occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the weaknesses sooner, corrective actions, significance of the issues and the need for lasting and effective corrective action. In addition, this is an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspectives on the severity of the weaknesses. The conference will also allow you to fulfill your commitment to meet with us.

We will contact you to schedule the predecisional enforcement conference to discuss these exercise weaknesses. At the conference, be prepared to address the identified exercise weaknesses, in particular, discuss the status of your proposed corrective actions, root causes and your plan for ensuring the corrective actions will be effective, including any of those actions that address issues common to Northeast Utilities.

Exercise weaknesses, according to 10 CFR Part 50, Appendix E.IV.F.2.g, are inspection findings that need to be corrected by the licensee. You are requested to provide this office with a description of any additional corrective measures you have taken or plan to take and your schedule for completing those actions within 30 days from the date of this letter or prior to the pre-decisional enforcement conference, whichever occurs first.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosure and your response (if you choose to provide one) will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you must specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure

Mr. Ted C. Feigenbaum

3

of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection, described in 10 CFR 73.21.

Sincerely,

ORIGINAL SIGNED BY:

James T. Wiggins, Director
Division of Reactor Safety

Docket No. 50-213

Enclosure: Inspection Report No. 50-213/96-07

cc w/encl:

B. D. Kenyon, President - Nuclear Group
F. C. Rothen, Vice President - Nuclear Work Services
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L. M. Cuoco, Senior Nuclear Counsel
A. M. Callendrello, Licensing Manager - Haddam Neck
H. F. Haynes, Director - Nuclear Training
J. F. Smith, Manager, Operator Training
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Mr. Ted C. Feigenbaum

4

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