U.S. NUCLEAR REGULATORY COMMISSION
REGION I

Report No. 85-39

Docket No. 50-423

License No. CPPR-113 Priority - Category B-1

Licensee: Northeast Nuclear Energy Company

P. O. Box 270

Hartford, Connecticut 06101

Facility Name: Millstone Unit 3

Inspection At: Waterford, Connecticut

Inspection Conducted: July 22-26, 1985

Meeting at: NRC RI, King of Prussia, Pa.

Meeting Conducted: August 1, 1985

Inspectors:

W. J. Lazarus, Senior EP Specialist — 10/1/85 date

C. Gordon, EP Specialist — 10/3/85 date

J. Hawxhurst, EP Specialist — 10/3/85 date

R. Hogan, IE Headquarters for — 10/1/85 date

Approved by:

T. Harpster, Chief
Emergency Preparedness Section — 10/6/85 date

Inspection/Meeting Summary: Inspection on July 22-26, 1985, Meeting on August 1, 1985 (Report 50-423/85-39)

Areas Inspected: Emergency Plan Implementation Appraisal to evaluate the adequacy and effectiveness of the emergency preparedness program for Millstone Unit 3, including organization, training, emergency facilities and equipment, and emergency implementing procedures. The inspection involved 140 hours by a team of four NRC inspectors.

Results: No violations were identified. Several issues were identified which were either not complete at the time of the inspection or which did not appear to meet currently accepted guidelines for emergency plans and procedures. A meeting was arranged for August 1, 1985 at NRC Region I to discuss and resolve these areas.

DETAILS

1. Persons Contacted

*D. Aloi, Emergency Planner
*W. Buck, Emergency Planning Coordinator
*P. Blasioli, Licensing Assistant
*J. Crockett, Unit 3 Superintendent
J. Kangley, Radiation Services Supervisor
*E. Molloy, Supervisor of Emergency Preparedness
*E. Mroczka, Vice President, Nuclear Operations
*R. Rodgers, Manager, Radiological Assessment Branch

*Denotes those present at the exit interview on July 26, 1985

The following attended the Management Meeting in Region I on August 1, 1985.

Licensee Attendees

P. Blasioli, Licensing Assistant
R. Rogers, Manager, Radiological Assessment Branch
J. Crockett, Millstone Unit 3 Superintendent

NRC Attendees

F. Kantor, Chief, Emergency Preparedness Section B, DEP&ER, IE
B. Doolittle, Licensing Project Manager, NRR
T. Harpster, Chief, Emergency Preparedness Section, Division of Radiation Safety and Safeguards (DRSS), RI
J. Hawxhurst, Emergency Preparedness Specialist, DRSS, RI
R. Hogan, Emergency Preparedness Specialist, DEP&ER, IE
J. Joyner, Acting Director, DRSS, RI
W. Lazarus, Senior Emergency Preparedness Specialist, DRSS, RI
E. McCabe, Chief, Reactor Projects Section 3B, Division of Reactor Projects (DRP), RI
R. Smith, Emergency Preparedness Specialist, DRSS, RI

2. Followup on Previous Inspection Findings

(Closed) 50-423/82-01-09. Develop integrated training/retraining program lesson plans. A review of lesson plans indicated that this item has been satisfactorily completed.

(Closed) 50-423/82-01-12. Align training categories to match functional areas of the emergency organization. The inspector verified that this had been satisfactorily completed.

3. Emergency Plan Implementation Appraisal

A. Organization

The inspector reviewed the licensee's emergency organization as described in the Emergency Plan, to verify that the requirements of 10 CFR 50 Appendix E and the guidance of NUREG-0654 were met.

The licensee's emergency organization is described in section 5 of the Emergency Plan for the Millstone Nuclear Power Station (MNPS), in MNPS Emergency Plan Implementing Procedures (EPIPs) and in the Corporate Organization for Nuclear Incidents (CONI) Procedure Manual. The Emergency Plan and EPIPs are site specific and are designed to be used for emergencies which may occur at any of the three Millstone units. The CONI procedures contain detailed descriptions of emergency functions and activities which are performed by the Corporate Emergency Organization at the Corporate EOC. The key functional areas of emergency activity are staffed initially by onsite station personnel. The plan describes the functional areas and the major tasks associated with these functional areas. The full Station Emergency Organization (SEO) is staffed by onsite and on-call station personnel within one hour. The Corporate Emergency Organization is fully activated within 90 minutes. The individual positions in the Station and Corporate Emergency Organizations are described in the plan and their major responsibilities are listed. Each of the managerial positions and their assigned responsibilities are also listed and are further detailed in individual EPIPs or CONI procedures.

A lead manager, designated by SORC and approved by the Station Superintendent, is assigned to each SEO position. Each lead manager chooses qualified and trained individuals to fill his/her assigned SEO position. The on-call schedule is generated using SF-150-1. The licensee has revised the applicable EPIPs and SF-150-1 to include Unit 3 personnel. The interfaces among the onsite functional areas are described in the emergency plan and in the EPIPs describing individual SEO positions. Interviews with selected SEO personnel indicated that functional interfaces during an emergency are understood.

Based on the above findings, the inspector determined that the emergency organization was acceptable except for the following areas:

1. It was noted that the Emergency Plan does not provide for any staff augmentation within 30 minutes as described in NUREG-0654, Table B-1. This item will be resolved by NRR during review and approval of the Emergency Plan. (50-423/82-39-01).

2. The Emergency Plan and associated implementing procedures did not specify the title of the individual(s) who would fill the SEO position of Manager of Operations Support Center. During the meeting on August 1, 1985, the licensee agreed to revise the Plan and procedures to correct this. This will be reviewed in a subsequent inspection (50-423/85-39-02).

B. Emergency Facilities and Equipment

The inspectors evaluated the licensee's emergency facilities and equipment to verify that they were sufficient to efficiently and effectively respond to the scope of emergencies defined in the Emergency Plan.

1. Assembly/Reassembly Areas

The licensee's Emergency Plan identifies three assembly areas for accountability of personnel as follows:

Primary Access Point (PAP)
North Access Point (NAP)
Alternate Access Point (AAP)

All onsite personnel who are not members of the SEO are required to assemble in the parking lot outside the nearest area. Shelter may be provided in privately owned vehicles, if necessary. Emergency kits are located at each assembly area which contain adequate equipment for portable lighting, communications, first aid and radiological monitoring. EPIP 4110, "Station Evacuation," discusses conditions to be considered when deciding to evacuate the station including the features of the assembly areas. The Millstone Public Information Office in Niantic, Connecticut and the Northeast Utilities baseball field are available as offsite reassembly areas, if necessary. It was noted that there were discrepancies in nomenclature of the Public Information Office and the assembly areas between the emergency plan and the EPIPs. The licensee is correcting these discrepancies.

All onsite personnel who are members of the SEO report to their designated response facilities. The EOF and the Training Facility serve as assembly areas for SEO personnel and non-SEO personnel, respectively, who are outside the protected area.

The inspector had no further questions in this area.

2. Medical Treatment Facilities

The interim medical treatment facility for Unit 3 is located in a trailer. The licensee intends to use this facility until the

new medical treatment facility, which would serve all three units is completed. Another facility is available in the Unit 2 turbine building.

The Unit 3 facility is accessible to stretchers and medical transportation. First aid equipment and supplies are adequate in the facility. For long-term definitive medical care, not available through the arrangements with local hospitals, the licensee has an agreement with the Yale-New Haven Hospital.

The inspector noted that the interim medical facility for Unit 3 is not discussed or described in the Emergency Plan. As the licensee plans to utilize this facility for a period of time after Unit 3 becomes operational, it should be designated and described in the Plan and applicable procedures. The licensee's action in this regard will be reviewed in a subsequent inspection (50-423/85-39-03).

3. Decontamination Facilities

In addition to the previously established personnel decontamination facilities near the Millstone Unit 1 and Unit 2 Health Physics office and in the EOF, the licensee has established a personnel decontamination facility in the Unit 3 Health Physics office.

The Unit 3 decontamination facility has sufficient supplies, shower capacity and survey equipment to perform its function. Personnel dosimetry and other health physics equipment are also available from the Health Physics office. A Health Physics technician would be assigned to perform radiological surveys. Supplies of potassium iodide are readily available from the Shift Supervisor if issuance is authorized. Decontamination procedures are available and provisions for disposal of liquid and solid waste have been made. There is an adequate supply of protective clothing.

The inspector had no further questions in this area.

4. Assessment Equipment

The inspectors reviewed the computerized Master Equipment List, EPIP 4603, "Emergency Radiation Equipment Maintenance and Inspection", and inspected EMT (emergency monitoring team) kits located in the Control Room, Operations Support Center (OSC), Emergency Operations Facility (EOF), and North Access Point. The inspectors determined that necessary equipment is included in the kits and that survey instruments and air sampling devices

were operable. EMT members have keys to lockers so that all kits are accessible. An adequate number of additional (backup) kits are available in the EOF. Radiation monitoring instruments have beta and gamma detection capability for measurement of whole body dose rates and plume exposure rates. Air sampling instruments can detect radioiodine at levels below 10^{-7} µCi/cc under field conditions. Silica gel cartridges are contained in each kit to detect airborne iodine in the presence of noble gas. Kits are inventoried by the licensee monthly. Instrument calibrations are performed onsite and calibration procedures are written and approved. Calibrations of survey instruments were found to be current.

No inadequacies were identified. The inspector had no further questions in this area.

5. Technical and Operations Support Centers

The inspectors reviewed Sections 7.1.3, 7.1.5, "Technical Support Center (TSC)" and "Operational Support Center (OSC)" of the Emergency Plan. The office area adjacent to the Control Room identified as the OSC, is located as described in the Plan. The designated office area is small but adequate to assemble and stage in-plant Emergency Monitoring Teams (EMT). The OSC manager's office is also located inside this area and is used to provide briefings to teams. The licensee stated that due to the OSC space limitations, large numbers of support personnel (health physics, I&C, electricians, maintenance, etc.) who would be assigned to the OSC, would report to the cafeteria (located one floor below) until called upon. The cafeteria can accomodate approximately 50 emergency personnel. The inspector noted that the use of this area for overflow OSC support personnel is not currently described in the Emergency Plan. Action to include this description in the Plan will be reviewed in a subsequent inspection (50-423/85-39-04). For offsite responders, the Emergency Plan indicates that the OSC will be established in the EOF and will be transferred into the plant if necessary. Since the OSC is not a hardened (shielded) facility, the backup staging area is identified as the Technical Support Center (TSC) in the event the OSC becomes uninhabitable. The TSC is located near the OSC and provides adequate shielding for emergency personnel. The three dedicated communication links (OSC/Unit 3 Control Room, OSC/Units 1&2 Control Rooms, OSC/EOF) are available for use by OSC emergency personnel and were found to be operable. Land lines are identified as backup communications for each of these links in addition to providing a link between the OSC and TSC.

The TSC contains the computer monitoring and assessment equipment, communications equipment, and necessary technical reference equipment, and meets habitability requirements. The control room is designated as an alternate location should the TSC become uninhabitable.

Except for completion of installation and testing of systems and equipment noted below, the OSC/TSC facilities and equipment were acceptable.

-- Separate ENS line to be installed for Unit 3.

-- Off-site Based Facility Information System (OFIS) acceptance test is yet to be completed.

-- Area Radiation Monitoring System (ARMS) instrument hookup not yet completed.

-- Safety Parameter Display System (SPDS) instrument hookup not yet completed.

-- Evacuation alarm acceptance test not yet completed.

-- Development of an equipment surveillance program is not completed.

The status of these items will be reviewed in a subsequent inspection prior to fuel load (50-423/85-39-05).

6. Meteorological Instrumentation

The inspectors reviewed the licensee's meteorological measurements program against the guidance and criteria listed below, specifically to determine:

-- if meteorological instruments provide reliable indication of the basic parameters required by the emergency plan;

-- that all instruments, required by technical specifications, are operable and calibrated;

-- that a surveillance program is established and maintained;

-- that the measurement program is adequately described and read-outs are available, and;

-- that provisions are established for continuously obtaining representative real-time meteorological information for dose projections and protective action decision making.

The licensee outlined the characteristics of their meteorological monitoring program and provided the inspector with a schematic description of the Environmental Data Acquisition Network (EDAN). A partial description of the instrumentation, monitoring location and data acquisition system were included in the FSAR Section 2.3.3 and the Emergency Plan, Appendix H. The licensee has indicated that a complete updated description of the program will be provided in the next revision and will include an accurate schematic diagram and description of the EDAN II system.

The inspectors found that the current meteorological instrumentation provided the basic parameters (i.e. wind direction and speed and a measure of atmospheric stability) necessary to perform initial dose assessment for ground level, vent, and main stack release pathways.

In the Control room, data from the meteorological monitoring program is provided through the Plant Nuclear Emergency Status System. No dose calculations are initially performed in the control room. All initial dose assessment is based on predetermined meteorological dispersion conditions which are factored into Emergency Action Levels (EALs).

In the EOF and Corporate Headquarters, data from the meteorological monitoring program is provided through the EDAN II system. The inspector found that meteorological data available for use in dose calculations was acceptable. The single meteorological tower does not adequately characterize the air flow and subsequent effluent transport in the vicinity during sea/land breeze episodes. Data unavailability from the onsite tower at times exceeds 10%, and both mandatory levels may be inoperable at once, due to severe weather (lightning). This concern was discussed during the meeting on August 1, 1985. The licensee provided assurance modification will be made and a well trained, knowledgeable meteorologist will be placed on-call along with meteorological technicians for the Millstone site and will be available to interpret conditions and maintain equipment within the EPZ. In addition, surrogate meteorological parameters can be provided from a Norwalk, CT tower operated by NE Utilities, to backup the primary meteorological data. This area appears to be acceptable and will be thoroughly reviewed after full implementation of licensee suggested corrective actions.

The inspectors noted that the meteorological instrumentation met the intent of Regulatory Guide 1.23 and exceptions (exposure of some of the sensors) were justified by licensee and corporate personnel. The inspectors verified that a maintenance program has been established and implemented; calibrations were performed at least semi-annually; and surveillance and operability checks are performed daily.

The licensee has agreed to make the following changes:

-- Provide a complete description of the meteorological monitoring program. Include as a minimum, a description of the essential meteorological parameters in the Emergency Plan (Section 7.6) with appropriate reference to the proposed revised description in FSAR Section 2.3.3 (50-423/85-39-06);

-- Provide a complete and adequate description of the Environmental Data Acquisition Network in the Emergency Plan (50-423/85-39-07);

-- Outline in the Emergency Plan, the program developed for providing supplemental meteorological information for 'refined' or secondary assessment capability in the vicinity of the plant (50-423/85-39-08); and

-- Improve the availability of onsite meteorological data by faster response to correct malfunctions of equipment (50-423/85-39-09).

In addition to the above findings, the licensee is evaluating the following for possible improvement of their program:

-- Provide a procedure for remote interrogation of the essential meteorological parameters of offsite agencies (NRC, State, and other federal agencies).

References

Millstone Nuclear Power Station Emergency Plan (Draft), Section 7.6, "Meteorological Data Acquisition".

NE Utilities CONI-4.09 (Rev. 2, 3/85), "On-Call Meteorological Team Responsibilities and Support Functions.

NE Utilities Service Comp., Env. Dept. (2/85), "Meteorological Training Manual".

Regulatory Guide 1.97
Regulatory Guide 1.23
NUREG - 0654
NUREG - 0737, Supplement 1

C. Emergency Plan Implementing Procedures (EPIP)

The licensee's EPIP's were reviewed in the following areas to verify that they were technically adequate to implement the provisions of the Emergency Plan.

1. Assessment Actions

The inspectors reviewed the licensee's dose assessment procedures, held walk-through discussions, and evaluated the program against the guidance and criteria listed below, specifically to determine:

-- That provisions for making initial dose projections are adequate, available, and personnel have been trained; and

-- that provisions are available for refined dose assessment and protective action decisionmaking.

The inspectors noted that in accordance with the Emergency Plan Section 6.2, "Assessment Action", initial dose assessment is based on an effluent monitor instrument reading only. Actual dose projections are performed after the EOF is activated, usually an hour following an Alert or higher classification.

The inspector found that EPIP 4223, "Computerized Calculation of Offsite Gaseous Concentrations and Doses - Puff Model" had been developed for refined dose assessment. The procedure has been implemented and the computer model was operable. Also, personnel in the Station Emergency Organization designated to use the procedure have been trained. The backup dose assessment method, EPIP 4201, is a series of worksheets and tables. This procedure provides the Manager of Radiological Dose Assessment (MRDA) an initial means for dose calculations before the EOF is fully staffed. The dose worksheets (EPIP 4201, #1-7) are completed at the EOF using information provided through the Offsite Based Information System (OFIS). The inspector determined after reviewing the procedure and conducting a walk-through, that the user must make several calculations using data extracted from a series of different tables. This tedious approach could easily present a potential for errors during an emergency. The procedure EPIP 4201 is inefficient, imprecise, and cumbersome for users. Individuals could also make mistakes due to the complicated nature of the procedure which requires interpolation and estimation of values. The inspector recognized that this procedure is used as a backup to EPIP 4223; however, when used, this manual method could make accurate dose assessment difficult.

Based on the above findings, the licensee is considering the following changes:

-- Utilize actual meteorological and radiological effluent measurements in determining emergency classification levels, (50-423/85-39-10); and

-- Computerize the backup (manual) radiological dose assessment method EPIP 4202 and verify and document its consistency with the refined method EPIP 4223 for the first hour of operation (50-423/85-39-11).

The licensee's action in this regard will be reviewed in a subsequent inspection.

In addition to the above findings, the licensee is considering the following for possible improvement of the program:

-- Develop a method to estimate sea breeze penetration and vertical mixing depth for refined dose assessment.

References

Millstone Nuclear Power Station E Plan (Draft), Section 6.2, "Assessment Actions".

EPIP 4201 (Rev. 9, 4/85), "Radiological Dose Assessment".

EPIP 4223 (Rev. 3, 4/85), "Computerized calculation of Offsite Gaseous Concentrations and Doses-Puff Model".

EPIP 4003 (Rev. 1, 3/85), "Manager of Radiological Dose Assessment".

NUREG 0654
NUREG 0737, Supplement 1
Reg. Guide 2.97 Rev. 2
NUREG/CR-2644

2. Maintenance of Emergency Equipment and Supplies

The inspector reviewed Section 8.4 of the Millstone Emergency Plan and held discussions with licensee personnel against the guidance and criteria listed below, specifically to determine that equipment and supplies as described in Appendix E of the Millstone Emergency Plan are available and properly maintained.

The inspector noted that a computer system has been established to maintain emergency equipment. A computer inventory listing of Station Emergency equipment locker content are maintained according to Section 8.4 of the Emergency Plan. The Health Physics Supervisor and Radiological Services Supervisor approves changes to the equipment lists. These equipment lists are not included in the EPIPS. A demonstration of four computer systems used during an emergency identified several areas which have not been fully implemented. The RMS, OFIS and

Plant Nuclear Emergency Status System are partially complete; RMS is scheduled to be completed by fuel load, OFIS will be fully functional prior to the October exercise, except for some instruments which aren't required until fuel load.

Based on the above findings, the following are areas of concern:

-- Equipment lists should be provided in emergency equipment lockers and kits (50-423/85-39-12);

-- An individual or group responsible for maintaining these lockers should be identified in Section 8.2 of the Millstone Emergency Plan (50-423/85-39-13);

-- Fully implement and describe in the Emergency Plan, the routine maintenance and surveillance on the OFIS system, (50-423/85-39-14); and

-- Implement and outline the RMS system (50-423/85-39-15).

References

Millstone Nuclear Power Station Emergency Plan (Draft), Section 8.4, "Emergency Equipment and Supplies" and Appendix E, "Emergency Equipment".

NUREG - 0654
NUREG - 0737, Supplement 1

3. Evacuation and Accountability

a. Evacuation

The licensee has established EPIP 4110, "Station Evacuation" to implement site evacuation activities and EPIP 4010B, "Acting Director of Station Emergency Operations" and EPIP 40001, "Director of Station Emergency Operations" which provide guidance for evacuation decisions. The guidance specifies radiation dose rates and iodine-131 levels as evacuation action levels. The locations of the assembly areas are specified in the evacuation procedure along with criteria to consider when deciding to evacuate. Provisions for oral announcements over the facility address system describing evaucation directions are discussed in EPIP 4010B, "Acting Director of Station Emergency Operations" and EPIP 4010C, "Manager of Control Room Operations." The evacuation procedures contain references to procedures describing the evacuation related activities of accountability, security, search and rescue, and public address announcement.

Evacuation route signs inside Unit 3 are not yet posted. The licensee is tracking this item which is scheduled to be completed before fuel loading (50-423/85-39-16).

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

b. Personnel Accountability

Personnel accountability is accomplished by security personnel in accordance with procedure SEP 5041, "Security During Operating Emergencies." A separate computer key reader system has been installed for Unit 3. A single computer listing can be obtained summarizing personnel remaining in both the Unit 1 and Unit 2 computer card key monitoring system and the Unit 3 computer key monitoring system. The Manager of Security (MOS) obtains the results of accountability after all non-SEA personnel have evacuated the protected area. The MOS reports the names of missing persons to the Director SEO. The Manager of Control Room Operations then initiates accountability of unlocated personnel by naming individuals over the public address system and providing instructions to them. EPIP 4113, "Entry into High Radiation Areas for Emergency Operations," provides instructions for emergency teams who are entering to perform specific tasks, including search and rescue. The Director SEO and acting Director SEO have the authority to conduct search and rescue operations. Search and rescue operations are directed and controlled by the Manager of Radiological Consequence Assessment.

Continuous accountability can be performed at any time by running a computer check to determine those individuals who are in the control room, TSC, OSC and the remaining protected area. The Manager of Control Room Operations, in EPIP 4010C, is tasked with maintaining personnel accountability within the protected area after station evacuation and search and rescues have been completed.

This area was found to be acceptable.

4. Emergency Action Levels (EAL)

The inspectors reviewed the licensee's EPIP's to verify that Emergency Action Levels were clearly defined and based on observable information to indicate the classification of emergencies, and that procedures were technically adequate for assessment, classification, and reporting of emergencies. The following procedures were reviewed:

EPIP 4701, Unit Incident Assessment, Classification, and Reportability, Rev. 2

EPIP 4701-3, Unit 3 Emergency Action Levels, Rev. 0

EPIP 4701-4, Reportability, Rev. 2

EPIP 4112, Incident Communications, Rev. 2

No inadequacies were identified.

D. Training

1. Program Establishment

The inspector reviewed the licensee's program for training and requalifying site personnel and other individuals assigned emergency duties and responsibilities as discussed in Section 8 of the Emergency Plan. Emergency training program course content, lessons plans, examinations, and employee feedback were discussed with the training supervisor and training instructors.

The NECo Training Department has the overall responsibility for administering the training program. Two instructors are permanently assigned to ensure that necessary Emergency Plan training is performed. An official training manual is currently under development by the training department. Basic course content for individuals assigned to each functional area of emergency activity is referred to in an abbreviated training matrix which identifies only two programs presented to key members of the onsite organization. Specific course titles and presentations along with actual qualification criteria must be extracted from lesson plans.

Training and retraining for licensee personnel assigned to functional areas is performed on a calendar year basis in lieu of the annual (±3 month) criteria. This item is unresolved and will be further reviewed in a subsequent inspection (50-423/85-39-18).

The inspectors reviewed the newly developed lesson plans for emergency plan training and determined that the plans adequately cover functional areas in: emergency response coordination, plant systems operation, radiological/environmental surveillance, first-aid/rescue, personnel monitoring, security/site access, dose assessment, and technical support for operations. Lesson plans identify terminal (general performance) and enabling (demonstrable) objectives. A general employee training (GET) film is shown to all new employees and is followed by a brief examination. GET requalification is performed once per

year. Changes have been made in the emergency training provided to offsite support organizations which describes how any modifications made for Unit 3 will impact them.

Depending on the lesson plan, the training program consists of classroom instruction followed by an open book exam. A minimal amount of practical training also accompanies the exam. Instructors were unable to provide information defining what training and qualifications individuals needed for key emergency response function. Specific qualification standards for hands-on demonstrations and practical training (aside from exercises) against which the degree of training effectiveness can be measured also have not been developed. The licensee is considering changes in this area. This will be reviewed in a subsequent inspection (50-423/850-30-19).

Although instructor qualification requirements are not formalized, discussions with training staff members indicate that they are competent to perform emergency preparedness training.

A computerized system for documenting training which includes the names of individual attendees, date, and lesson plan number (program) has been developed to upgrade the manual method for recordkeeping. The licensee is conducting practical or walk-through training in the areas of emergency classification, radio communications, notifications (incident report form), OFIS, and on the simulator and expects to document the results of such training on the computer system. (See Section D.2.)

The inspectors observed a training overview session provided to key emergency managers and determined that it adequately covered information pertaining to EPIP's in major functional areas, emergency organization and lines of authority, notifications and communications, emergency classification, and protective measures as related to State posture codes.

The inspectors also discussed training of emergency monitoring teams (EMT) with training instructors and determined that lesson plans are in place which cover use of equipment, interpretation of results, and special precautions to be taken under accident conditions. In the event of an accident, EMT's 1 and 2 are trained to maintain site communications while EMT's 3, 4, and 5 are trained to maintain constant contact with corporate representatives in Berlin.

Procedure NTD-EP-01 indicates that all changes to EPIP's are distributed to appropriate response personnel. Training on procedural revisions has been provided to Unit 3 Operations personnel (Shift Supervisors, Senior Control Room Operators, and Shift Supervisor's Staff Assistant), Control Room Data

Coordinator, Manager of Technical Support, and I&C mechanics/electricians, etc. Non-licensee organization personnel (contractors, vendors) receive a 30-minute overview presented on videotape. The inspectors reviewed the overview and determined that it contains basic information and instructions, i.e., site description, assembly areas, sirens, alarms, that employees should follow in the event of an emergency.

The inspector had no further questions in this area.

2. Program Implementation

The inspector reviewed the training program established for members of the Station Emergency Organization against the guidance of NUREG-0654 and Reg. Guide 1.8, specifically to verify that:

-- training records indicate that all required training had been completed in the manner required;

-- training actually took place and was consistent with lesson plans; and

-- the program was effective in that licensee personnel demonstrated an understanding of their duties.

The inspector determined that both general and specialized training had been provided to all of the 10 persons who were selected from the licensee's Station Emergency Organization Call-out list. In order to determine the effectiveness of the training program, the inspector conducted a table top exercise and observed a simulator training session where off-normal conditions were initiated resulting in the classification of a Site Area Emergency followed by the appropriate notification.

Except as noted below, no inadequacies were identified.

The inspector noted that the computerized training system for documenting and maintaining records of emergency preparedness training has not been fully implemented. This will be reviewed in a subsequent inspection (50-423/85-39-17).

3. Observation of Fire Drill

The inspectors observed the response of personnel to an unannounced fire drill in which a fire was simulated in the Service Water Building. The assessment and classification of the simulated emergency, activation of the notification system, emergency communications, and response of personnel to fight the fire were noted to be excellent.

4. Exit Interview

The inspectors met with the persons noted in paragraph 1 at the conclusion of the inspection to describe the scope and findings of the inspection as detailed in this report. Licensee management acknowledged the findings and requested a meeting with the NRC to discuss certain aspects of the Emergency Plan and emergency preparedness program and develop a schedule to resolve deficient areas. Results of the meeting are described within this report.

At no time during this inspection did the inspectors provide any written information to the licensee.