

U. S. NUCLEAR REGULATORY COMMISSION

REGION V

Report No. 50-397/85-13

Docket No. 50-397

License No. NPF-21

Licensee: Washington Public Power Supply System
3000 George Washington Way
P. O. Box 968
Richland, Washington 99352

Facility Name: Washington Nuclear Project No. 2 (WNP-2)

Inspection at: WNP-2 Site, Benton County, Washington

Inspection conducted: June 24-28, 1985

Inspectors:

G. M. Temple
G. M. Temple, Emergency Preparedness Analyst

7/23/85
Date Signed

Team Member: M. I. Good, Comex Corporation

Approved By:

R. F. Fish
R. F. Fish, Chief
Emergency Preparedness Section

7/23/85
Date Signed

Summary:

Inspection on June 24-28, 1985 (Report No. 50-397/85-13)

Areas Inspected: A routine, unannounced emergency preparedness inspection in the areas of knowledge and performance of duties (training), licensee audits and changes to the emergency preparedness program. The inspection involved about 72 hours onsite by one NRC inspector and one contractor team member.

Results: No significant deficiencies or violations of NRC requirements were identified.

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DETAILS

1. Persons Contacted

- *J. Baker, Assistant Plant Manager, WNP-2
- *G. Bouchey, Director, Support Services
- *R. Chitwood, Manager, Emergency Planning and Environmental Programs
- J. Dabney, Shift Support Supervisor
- C. Day-Phalen, Principal Training Development and Evaluation Program Specialist
- D. Gano, Shift Technical Advisor
- N. Hancock, Shift Manager
- T. Houchins, Manager, Audits
- *A. Klauss, Senior Emergency Planner
- J. Little, Planning and Scheduling Supervisor
- *D. Mannion, Senior Emergency Planner
- *J. Martin, Assistant Managing Director, Operations
- S. McCay, Shift Manager
- *M. Mills, Energy Site Specialist, Washington State EFSEC
- *R. Mogle, Senior Emergency Planner
- *A. Ogletree, Manager, Training Development and Evaluation
- R. Quay, Manager, General and Technical Support Training
- W. Shaeffer, Shift Manager
- *G. Sorensen, Manager, Regulatory Programs
- *R. Stickney, Manager, Technical Training
- *C. Van Hoff, Senior State Liaison

*Denotes those present at exit interview.

2. Licensee Audits

The inspector examined audit reports to determine that an independent audit/review of the emergency preparedness program had been conducted on an annual basis in accordance with 10 CFR 50.54(t) and Section 18 of the licensee's Emergency Plan (EP). Audit reports for 1984 and 1985 were examined. Both of the audits (Report Nos. 84-275 and 85-318) were conducted by the licensee's Corporate Licensing and Assurance Department. Both audits addressed the program areas identified in the EP. Twelve Quality Finding Reports (QFRs) were identified in Audit Report No. 84-275 and six QFRs and nine Items of Concern were identified in Audit Report No. 85-318. The results of the audits were reported to appropriate corporate and plant management as well as involved State and local organizations. The inspector found the depth of the audits to be thorough and the audit reports appeared to be well written, with a sound basis for all findings.

During the examination of the independent audit, the inspector questioned some of the wording used in Section 18.4 of the licensee's EP. This section is entitled "Independent Audits of the Emergency Preparedness Program" and states in part that:

The Corporate Nuclear Safety Review Board will audit the Emergency Preparedness Program annually. This audit may be used to satisfy the requirements discussed above.

Paragraph (t) of 10 CFR 50.54 states in part that this review shall be conducted "by persons who have no direct responsibility for implementation of the emergency preparedness program". Since the Manager of Support Services is a member of the Corporate Nuclear Safety Review Board (CNSRB) and the Manager of Emergency Planning and Environmental Programs (EP&EP) reports directly to this individual, it would appear to be inappropriate for the Support Services Manager to participate in the annual audit of the Emergency Preparedness Program. This matter was discussed with both of the aforementioned managers. The discussion disclosed that the statement made in the EP does not accurately reflect the CNSRB's involvement in the audit in that the audit is not performed by the CNSRB, but is performed under the "cognizance" of the CNSRB. Both managers agreed that this portion of the EP was poorly worded. The EP&EP Manager made a notation of the inspector's comments in his working copy of the EP to ensure that the wording would be changed and incorporated into the next revision of the EP. Since there appears to be no formal procedure or guidance for accumulating changes to the EP (see details section 3) the Region intends to follow-up on this change to the EP (open item 85-13-01).

One of the QFRs (No. 8) issued as a result of Audit Report No. 84-275 involved the lack of documentation to track corrective actions associated with drills. In response to the QFR, the EP&EP organization developed a system and assigned responsibility for maintaining documentation for items needing corrective actions. The new system was in place with documentation included for the 1984 and 1985 drill programs.

No significant deficiencies or violations of NRC requirements were identified during this part of the inspection.

3. Changes to the Emergency Preparedness Program

The changes and methods of making changes to the emergency preparedness program were reviewed to determine that changes were made in accordance with 10 CFR 50.54(q), that changes to facilities had been incorporated into the EP, and to verify that changes to the emergency organization had been incorporated into the EP and Emergency Plan Implementing Procedures (EPIPs). The EP and EPIPs were reviewed for consistency and discussed with emergency planning personnel. No substantive differences were noted. The working copy of the EP held by emergency planning personnel was found to contain several changes which would be incorporated in the next revision. Revisions to the EP were submitted to the NRC within the required 30 days.

EPIPs are changed using Plant Procedures Manual (PPM) 1.2.4., Revision 7, "Plant Procedure Approval and Revision". There appeared to be no formal procedure or guidance for accumulating and initiating changes to the EP or determining if a change to the EP would reduce the effectiveness of the plan as described in 10 CFR 50.54(q). It was noted that EP and EPIP changes were reviewed and approved by the Plant Operations Committee.

No significant deficiencies or violations of NRC requirements were identified during this part of the inspection.

4. Knowledge and Performance of Duties (Training)

A review of the training program was conducted to ensure an effective emergency preparedness training program was established and maintained in accordance with 10 CFR 50.54(q), 10 CFR 50.47(b)(15) and Section IV.F of Appendix E to 10 CFR 50. This review included an examination of applicable training records, lesson plans, attendance sheets, procedures and other documentation. Selected key emergency response personnel were interviewed and given walkthroughs to determine if they understood their emergency responsibilities and could perform their assigned emergency response duties. Interviews and walkthroughs included scenarios which required detection, mitigation, classification, notifications and protective action recommendations both onsite and offsite.

The emergency preparedness training program is addressed in Section 16 of the licensee's EP, EPIP 13.14.7, Revision 4, "Emergency Training" and EPIP 13.14.8, Revision 1, "Drills/Exercises". Training is also addressed, in part, in the following plant documents:

- PPM 1.2.5, Plant Procedure Distribution and Control
- PPM 1.8.1, Training Program Administration Technical Training Manual
- EPIP 13.14.5, Emergency Organization

The emergency preparedness training was found to be as described in program directives. The required records to support initial specialized and periodic retraining for key emergency response personnel were available. Tests, attendance sheets and other documentation supported the Emergency Plan Training System (EPTS) computer report of EP training with one exception. This matter is discussed later in this section.

During walkthroughs and interviews with Shift Managers, the inspector found that, in general, all of the personnel interviewed were familiar with the duties of the Plant Emergency Director which cannot be delegated, as discussed in NUREG-0654, paragraph II.B.4. These include the decision to notify and recommend protective actions to authorities responsible for offsite emergency measures. However, one Shift Manager thought classification could not be delegated and did not know any other duties that could not be delegated. All other Shift Managers were familiar with the non-delegable responsibilities as stated in Section 13.1.2.1 of EPIP 13.1.2, Revision 2, "Plant Emergency Director Duties". These included the decision to request offsite assistance and make protective action recommendations. The decision to make notifications was not listed in the procedure. It should be noted that the two non-delegable responsibilities contained in EPIP 13.1.2 were found in the "purpose" section rather than the body of the procedure. The inspector reviewed lesson plans for protective action recommendations and lesson plans covering notification of offsite authorities to determine if the non-delegable responsibilities were addressed. It appeared that the lesson plans did not cover this information. This matter was brought to the licensee's attention for consideration.

During walkthroughs involving a total loss of physical control of the facility, some control room operators failed to make appropriate protective action recommendations as required by Attachment A,

sheet 2 of 2, of EPIP 13.14.2, Revision 3, "Process for Determining Protective Action Recommendations". The operators failing to make appropriate recommendations believed that the automatic, immediate actions of Attachment A for a general emergency were optional and need not be taken if there is no actual release in progress. The remainder of the Shift Managers interviewed had no difficulty in making appropriate protective action recommendations. This matter was brought to the licensee's attention for consideration.

Training records for all Shift Managers and emergency response facility directors were compared against the EPTS computer printout and the requirements of EPIP 13.14.7. One recently qualified Shift Manager, who was standing Shift Manager watches in the control room, had completed all emergency preparedness training required by EPIP 13.14.7, Attachment B, Section 1, for the Shift Manager position, except for Technical Support Center Operations. A review of plant procedures and discussions with the EP&EP Manager revealed that there was no form, procedure, or sign-off that would assure all EP training was completed prior to an individual being assigned to an emergency position. This matter was brought to the licensee's attention because oversights of this nature could result in the issuance of a violation.

Incident to this part of the inspection EPIP 13.4.1, Revision 3, "Notifications," was reviewed. It describes plant notification procedures for Supply System emergency response personnel and offsite organizations. EPIP 13.4.1 does not reflect notification of NRC headquarters as required by 10 CFR 50.72. 10 CFR 50.72, paragraph a.3 requires that the licensee "shall notify the NRC immediately after notification of the appropriate State or local agencies and not later than one hour after the time the licensee declares one of the Emergency Classes". Previous 10 CFR 50.72 requirements allowed that NRC headquarters should be notified as soon as possible, but within one hour. The inspector noted that none of the individuals interviewed during the walkthroughs were familiar with the revised requirements. This matter was brought to the licensee's attention for consideration.

As a final note in the area of training, the inspector observed what appeared to be improper health physics practices on the part of one individual working at the health physics access control point. The individual was observed eating food from a plastic bag which was located on the table where potentially contaminated objects are placed prior to "frisking". The individual appeared to recognize the mistake and then picked up the plastic bag and placed it on a desk, neglecting to "frisk" the bag first. This matter was reported to licensee personnel during the inspection and a follow-up conversation was held with licensee personnel, subsequent to the inspection. In addition, the Region's Facilities Radiological Protection Section Chief was provided with this information.

No significant deficiencies or violations of NRC requirements were identified.

5. Emergency Plan Implementing Procedure Review

As part of the emergency preparedness licensing program, the Region V Emergency Preparedness Section is required to perform an annual review of changes to licensee's EPIPs. This review was accomplished in the office, prior to this inspection. The following procedures were reviewed.

- 13.2.1, Revision 2 - Fires/Explosions
- 13.2.3, Revision 2 - Toxic or Flammable Gas Releases or Oxygen Deficient Atmosphere
- 13.4.1, Revision 3 - Notifications
- 13.5.3, Revision 2 - Evacuation of Nearby Facilities
- 13.7.5, Revision 2 - Decontamination Operations at Remote Decontamination Locations
- 13.7.10, Revision 0 - Offsite Emergency Response Personnel Dosimetry
- 13.8.2, Revision 2 - Manual Offsite Dose Calculations
- 13.9.6, Revision 2 - Field Analyses of Environmental Samples
- 13.10.1, Revision 2 - Control Room Operations and Shift Manager Duties
- 13.10.12, Revision 2 - Reentry Team Duties
- 13.10.13, Revision 2 - Recovery Team Duties
- 13.11.15, Revision 2 - Communications Center Operations
- 13.11.17, Revision 0 - Nearby Nuclear Facility Emergencies/Request for Assistance
- 13.13.1, Revision 1 - Reentry
- 13.13.2, Revision 1 - Recovery Operations
- 13.14.1, Revision 1 - Emergency Exposure Levels
- 13.14.2, Revision 2 - Process for Determining Protective Action Recommendations
- 13.14.3, Revision 1 - Supply System Health Physics Procedures, Radiological Programs, Instructions, and Environmental Programs Instructions
- 13.14.4, Revision 2 - Emergency Equipment
- 13.14.5, Revision 2 - Emergency Organization

13.14.7, Revision 3 - Emergency Training

13.14.8, Revision 2 - Drills/Exercises

The changes made continued to implement the EP, did not reduce the effectiveness of emergency preparedness and did not result in a failure to meet the performance standards in 10 CFR 50.47(b).

6. Exit Interview

An exit interview was held with the licensee on June 28, 1985 to discuss the details of the inspection. The inspector summarized the inspection findings described in the individual program areas represented in this report. During the exit interview, the licensee was informed that no significant deficiencies or violations of NRC requirements had been identified. The licensee was informed that the area of EP training was re-examined as a result of problems experienced during the January 1985 emergency preparedness inspection. The licensee was informed that a portion of the inspection involved follow-up on the Emergency Operations Facility ventilation system. This follow-up information has been incorporated into the Emergency Response Facilities appraisal report, IE Inspection Report No. 50-397/85-10.