

APPENDIX B

U. S. NUCLEAR REGULATORY COMMISSION
REGION IV

NRC Inspection Report: 50-298/85-22

License: DPR-46

Docket: 50-298

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

Facility Name: Cooper Nuclear Station

Inspection At: Cooper Nuclear Station, Brownville, Nebraska

Inspection Conducted: July 15-19, 1985

Inspector: Charles A. Hackney 8-30-85
C. A. Hackney, Emergency Preparedness Analyst Date

Other Accompanying Personnel:

F. N. Carlson, Comex Corporation

Approved: J. B. Baird 8/30/85
J. B. Baird, Acting Chief, Emergency Preparedness and Safeguards Programs Section Date

Inspection Summary

Inspection Conducted July 15-19, 1985 (Report 50-298/85-22)

Areas Inspected: Routine, unannounced inspection of the licensee's emergency preparedness program in the areas of knowledge and performance of duties, program review, evaluation of exercises and changes to the emergency plan. The inspection involved 80 inspection hours by two NRC inspectors.

Results: Within the emergency response areas inspected, one violation was identified (inadequate training - paragraph 3).

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DETAILS1. Persons ContactedPrincipal Licensee Personnel

- *P. V. Thomason, Division Manager of Nuclear Operations
- *P. R. Windham, Emergency Planning Coordinator
- *D. A. Whitman, Technical Staff Manager
- *C. Goings, Regulatory Compliance Specialist
- *J. Sayer, Senior Technical Radiological Advisor
- *D. Reeves, Training Manager
- *R. Drier, General Employee Instructor
- V. Andrew, Secretary
- R. Drier, General Employee Instructor
- R. Black, Operations Supervisor
- J. Boyd, Shift Supervisor, Crew A
- D. Kuser, Control Room Supervisor, Crew A
- B. Liesmeyer, Shift Supervisor, Crew E
- M. Kaul, Control Room Supervisor, Crew E
- D. Bremer, Shift Supervisor, Crew B
- D. Shrader, Shift Supervisor, Crew C
- D. Vanderkamp, Control Room Supervisor, Crew C
- T. Ratzlaff, Shift Supervisor, Crew D
- M. Ward, Shift Supervisor, Crew D
- M. Unruh, Maintenance Planner and Scheduler
- B. Land, Maintenance Planner and Scheduler

Nebraska State Park

- C. Maltas, State Park Employee
- C. Cook, Secretary

NRC

- *D. L. DuBois, Senior Resident Inspector

The NRC inspector also held discussions with other station and corporate personnel in the areas of operations, emergency response organization, quality assurance, and training.

*Denotes those present at the exit interview.

2. Licensee Action on Previous Inspection Findings

(Closed) Open Item (298/8113-107) - Quality Assurance Procedure 1900 is to be used for evaluating the effectiveness of training. This item is closed.

(Closed) Open Item (298/8113-119) - Quality Assurance Procedure 1900 is to be used for review of the effectiveness of the emergency plan, procedure review, and provide review of classroom training records. This item is closed.

(Closed) Open Item (298/8321-02) - The licensee had provided emergency information booklets to the Indian Cave State Park for distribution to park visitors. Further, a bulletin board had been erected at the Brownville State Park providing park visitor with emergency information. This item is closed.

(Closed) Open Item (298/8509-01) - EPIP's 5.7.2, 5.7.3, 5.7.4 and 5.7.5 were reviewed with respect to nondelegatable authorities and responsibilities. A note had been added to appropriate procedures which stated that the decision to notify or recommend protective actions to offsite authorities may not be delegated by the emergency coordinator. This item is closed.

(Closed) Open Item (298/8509-03) - Notification Procedure EPIP 5.7.6 adequately addressed notifying the state within 15 minutes following the declaration an emergency. This item is closed.

(Closed) Open Item (298/8509-04) - Notification Procedure EPIP 5.7.6 adequately addresses notifying the NRC according to 10 CFR 50.72. This item is closed.

(Closed) Open Item (298/8509-05) - During the supervisors and operators training conducted from March 3, 1985, through April 23, 1985, security EAL's were included as part of their training. This item is closed.

(Closed) Open Item (298/8509-07) - Special notes had been included in EPIP's 5.7.2 and 5.7.6 to alert the user. This item is closed.

(Closed) Open Item (298/8509-09) - The operations procedure change notice had been revised to include a statement incorporating the 10 CFR 50.54(q) review requirement. This item is closed.

(Closed) Open Item (298/8509-11) - The emergency planning coordinator has been exempted from attending emergency plan training due to his teaching most of the onsite and offsite training. This item is closed.

3. Emergency Detection and Classification

The NRC inspector reviewed selected sections of the Cooper Nuclear Station (CNS) Emergency Plan, hereafter called the Plan, and Emergency Plan Implementation Procedures (EPIPs). Special NRC inspector attention was devoted to the EPIPs in the area of emergency detection, classification, notifications, and protective action recommendations to offsite agencies. The NRC inspectors also conducted walkthroughs of these areas with six shift supervisors and three control room supervisors. The nine senior reactor operators represented all five operations shifts.

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

- Most Emergency Action Levels (EALs) were found to be based on limits or parameters consistent with those read or available in the control room.
- Decisional aids were not readily available and cumbersome to use.
- The maps for the emergency planning zone and plume exposure pathway did not directly correlate compass degrees for wind direction with sector letter designation.
- The graph behind the control panels for conversion of mrem/hr readings from the steam jet air ejector radiation monitors to micro Ci/sec were on small paper so that the graphs were "folded". Because of the double curves, operators were observed to err by using the wrong combination of scale and graph.
- Checklists were to be extracted from controlled copies of the EPIPs and no extra copies were available for repeat use.
- One team failed to correlate reactor conditions with the Emergency Action Levels (EALs) and properly classify the simulated conditions corresponding to the EALs in EPIP 2.6.1 as a General Emergency. Other teams were able to recognize and properly classify simulated conditions; however, they appeared to lack familiarity with their EPIPs and notification list. This was identified as a violation of the training provisions of 10 CFR 50.47(b)(15), as implemented in Section 8.1.1 of the Plan, requiring familiarity with the Plan and EIPs (298/8522-01).

Communication checks were made with offsite agencies and each agency was contacted in accordance with procedure. Some confusion was noted in the early stages as to what procedure and checklist was appropriate. However, the shift supervisors were aware of the 15 minute notification to the state and local governments.

One violation was identified.

4. Protective Action Decisionmaking

The NRC inspectors reviewed selected sections of the Plan and reviewed the emergency organization personnel list. The NRC inspectors interviewed operations personnel to determine their capabilities in initiating and making protective action recommendations to appropriate offsite agencies.

The NRC inspector noted that the EIPs contained special notes as reminders to assist operations personnel e.g., authorities and responsibilities for the emergency director are defined. Undelegatable responsibilities were highlighted and clearly stated in the appropriate EIPs. Further, the immediate recommendation for sheltering within a two mile radius and five miles downwind in the affected sectors were highlighted and specified in the checklist (EIP 5.7.5-General Emergency).

During the walkthroughs with each of the five shifts, the ability to assume command as the Emergency Director and transfer of command was adequately demonstrated.

No violations or deviations were identified.

5. Notifications and Communications

The NRC inspectors reviewed appropriate procedures for notifying and communicating with offsite agencies during an emergency. The Plan and associated EIPs were consistent with 10 CFR 50.72 notification requirements. Further, the licensee had provisions for message verification.

The NRC inspector noted that EIP 5.7.6 stated that "notification will commence within 15 minutes of the declaration of an emergency." 10 CFR Appendix E IV D.3 states that: "A licensee shall have the capability to notify responsible state and local governmental agencies within 15 minutes after declaring an emergency." The difference in these statements was brought to the licensee's attention.

During walkthroughs with the shift supervisors and control room supervisors, various situations were given that required portions of the communication system to be utilized. Communications with offsite agencies, including the NRC Operations Center, were accomplished satisfactorily. The communication system appeared to function and each agency responded to their notification. The NRC inspectors noted that

extra copies of forms may be of assistance to the emergency team. Further, it was noted that the offsite notification form did not have a space for the Emergency Directors release signature.

The preventative maintenance program for the prompt public notification system was reviewed to confirm maintenance and periodic testing. The NRC inspector noted monthly calls were made to determine if a cross section of the public was receiving a radio message via their tone alert radios. Further, the NRC inspector reviewed call-in of station personnel for shift augmentation.

No violations or deviations were identified.

6. Public Information

Section 8.0 D. of the emergency plan states that a booklet would be distributed to motel occupants, state parks and camp grounds in the 10 mile emergency planning zone. The NRC inspector determined that the state park had a supply of booklets for distribution to visitors. However, the motel did not have any booklets available for distribution. It was determined that there had been a policy change by the motel owner in requesting restocking of the booklets unknown to the licensee. Upon being notified that there were not any booklets available, the licensee sent a supply of booklets to the motel owner. Further, the licensee will implement a periodic check to assist in maintaining a supply of booklets at the motel.

No violations or deviations were identified.

7. Exit Interview

The exit interview was held July 19, 1985, at the Cooper Nuclear Station administration building. The exit interview was conducted by Mr. C. A. Hackney, Emergency Preparedness Analyst, with Mr. D. L. DuBois, NRC Senior Resident Inspector in attendance. The licensee was represented by Mr. P. V. Thomason, Division Manager of Nuclear Operations and members of his staff. The licensee was given a summary of the inspectors' findings, observations, and comments. The inspector stated that, based on walkthrough observations, two operations personnel were not familiar with their emergency detection and classification procedures. The NRC inspector was given a letter dated July 19, 1985, stating that the shift supervisor was suspended from duties as an emergency director and would receive additional remedial training, oral testing, and demonstrate adequate knowledge of Emergency Director duties prior to being reinstated.