U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report No. 50-346/85034(DRSS)

Docket No. 50-346 License No. NPF-3

Licensee: Toledo Edison Company
Edison Plaza
300 Madison Avenue
Toledo, Ohio 43652

Facility Name: Davis-Besse Nuclear Power Station, Unit 1

Inspection At: Davis-Besse Site, Oak Harbor, Ohio

Inspection Conducted: October 10-11, 1985

T. Ploski

Inspector: T. Ploski 10/24/85
Date

Approved By: M. Phillips, Chief 10/24/85
Emergency Preparedness Date
Section

Inspection Summary

Inspection on October 10-11, 1985 (Report No. 50-346/85034(DRSS))
Areas Inspected: Special, announced inspection of the following aspects of the emergency preparedness program: licensee's procedures and training program for licensed operators regarding reporting of events to the NRC Operations Center; licensee initiatives in response to the Systematic Assessment of Licensee Performance (SALP) evaluation of this functional area; completion status of the Technical Support Center (TSC); revision to the Emergency Plan and Implementing Procedures; and licensee actions on previously-identified items.
Results: No violations or deviations were identified.

DETAILS

1. Persons Contacted

*L. Storz, Plant Manager
*J. Faris, Administrative Coordinator
*N. Molter, Administrative Coordinator
*J. Scott-Wasilk, Environmental and Emergency Preparedness Manager
*R. Varley, Emergency Planning Supervisor
*J. Lietzow, Nuclear Licensing Specialist
V. McDonald, Nuclear Licensing Specialist
R. Simpkins, Operations Training Manager
P. Timmerman, Training Instructor
F. Swanger, Supervisor, Shift Technical Advisors

*Indicates those who attended the October 11, 1985 exit interview.

2. Licensee Procedures and Training on Reporting Events to the NRC Operations Center

The inspector examined the licensee's (pre and post-June 9, 1985) procedural guidance and related training regarding the reporting of events to the NRC Operations Center by Control Room personnel, per 10 CFR 50.72. The procedural guidance was contained in Revision 11 to Administrative Procedure AD 1839.00, Station Operations. This comprehensive procedure described the administrative controls established for a multitude of duties of onshift personnel, including guidance for the accomplishment, control, and documentation of those activities. As such, the procedure addressed many aspects of the onshift organization, including: shift organizational hierarchy; minimum shift staffing; duties and responsibilities of each position; fire brigade requirements; use of procedures; logkeeping requirements; shift relief; shift operations during emergencies; incident reporting; conduct of surveillance tests; periodic inspection tours; removal or return of a system or components; safety limits and settings; and limiting conditions for operation. The procedural guidance for incident reporting, as contained in Sections 5.13.2 through 5.13.4 of AD 1839.00, adequately addressed the regulatory requirements of 10 CFR 50.72. While Section 5.13.2 of the procedure required the Shift Supervisor (SS) to notify the NRC and several licensee personnel in the event of an emergency plan activation, it did not specifically state the regulatory requirement to notify appropriate State and local governmental agencies following any emergency declaration. Instead, this paragraph referred the user to Emergency Plan Implementing Procedures (EI 1300 Series) which did require that onshift personnel notify specific State and county organizations within fifteen minutes of any emergency declaration. The procedure also indicated that, although the SS was responsible for making initial incident reports, he had the prerogative of selecting a knowledgeable person to maintain an open line with the NRC Operations Center until released by NRC personnel. Regarding documentation of telephone conversations between onshift and NRC Operations Center

personnel, the procedure stated that all conversations would probably be recorded (by the NRC) and that the SS should note in the Unit log that the NRC had been contacted.

Based on records reviewed and discussions with Training Department staff, the inspector determined that required training on administrative controls procedures such as AD 1839.00 had been conducted biannually. Training on the current Revision 11 to AD 1839.00 had taken place during the period May through July 1985. The associated lesson plan closely adhered to the procedure. Training sessions had been attended by all licensed onshift personnel and Shift Technical Advisors (STAs) as well as by all licensed staff personnel. However, those who had scored at least 80 percent on Category 8 of their most recent, annual licensed operator requalification examination were exempted from taking a quiz on the course material.

Since the June 9, 1985 event the licensee has initiated corrective actions to improve procedural guidance to onshift personnel regarding contacting the NRC Operations Center. One of the licensee's findings, as stated in Action Plan 3 under "Operator Actions and Procedural Adequacy" was that information provided by the STA to the NRC did not adequately convey specific plant conditions, the reason for the notification, and the severity of the transient. Also, personnel were not sufficiently prepared to answer the NRC Duty Officer's specific questions. The licensee concluded that the root cause of these problems was the lack of adequate procedural guidance for providing information to the NRC. As a result, the STA Supervisor has been tasked with revising AD 1839.00 to better ensure that onshift personnel will be prepared to communicate with the NRC Duty Officer. The STA Supervisor stated that the revised AD 1839.00 would include a checklist, based on the NRC Duty Officer's checklist, to enable onshift personnel to better anticipate the NRC's information needs and questions. The STA Supervisor indicated that such a checklist could also be posted at ENS telephone locations and could even serve as a documentation aid. The proposed revision to AD 1839.00 was not available for the inspector's review. However, the licensee indicated that the procedure revision and associated training to all licensed personnel and STAs would be completed prior to restart. This will be tracked by the NRC as Open Item No. 346/85034-01.

Based on the above findings, the licensee's current procedural guidance and related training on incident reporting to the NRC are acceptable, with the exception that the procedure failed to emphasize the licensee's own need to adequately document information verbally transmitted to the NRC. The adequacy of the proposed revision to AD 1839.00 and the related training effort cannot be determined until the revised procedure, lesson plan, and training session records are available for review. However, the licensee's schedule for issuing the revision and completing the associated training are appropriate.

The following items should be considered for improvement:

- Procedure AD 1839.00 should specifically state the requirement for onshift personnel to initially notify both State and county officials within fifteen minutes of any emergency declaration, rather than simply referencing EI 1300-series procedures.

- The checklist currently under development should be based on the current revision of the NRC Duty Officer's checklist; be readily available at all ENS telephone locations; and should also be used to improve documentation of conversations with the NRC.

- The abilities of onshift personnel to adequately communicate with NRC Headquarters and Regional staffs should be tested and improved upon during simulator training, practice exercises and annual exercise situations.

3. Licensee Initiatives Following the SALP IV Evaluation

The following paragraphs summarize progress made since April 1985 on various activities affecting the emergency preparedness program.

a. Changes to the Emergency Duty Officer (EDO) Program

The SSs and STAs had completed interim-EDO training during the first quarter of 1985. The supplementary training requested by the STAs has been scheduled for the first week in November 1985, and will be given by a member of the Emergency Planning staff. The draft lesson plan was comprehensive, and included an exercise scenario walkthrough in addition to reviews of the Emergency Plan and its implementing procedures.

By letter dated September 30, 1985, the licensee clarified the intended use of STAs as interim-EDOs from that described in Revision 9 to the Emergency Plan. Although STAs will be trained as interim-EDOs, they would not function as such unless both the SS and Assistant SS were not in the Control Room or were incapable of functioning as interim EDO.

Pending implementation of Revision 10 to the plan, the licensee still intended that the new Emergency Planning (EP) Supervisor would also be the Lead EDO and would have several alternates. These alternates would be selected from the current group of approximately one dozen persons who rotate the EDO duty on a weekly basis. The new EP Supervisor was scheduled to complete EDO training in November 1985. The first alternate for the Lead EDO had already been chosen from among the expanded EP staff and was already qualified as an EDO. No other alternate EDOs have yet been identified.

The following item should be considered for improvement:

- The licensee should identify all alternate EDOs by the time that the EP Supervisor is ready to become Lead EDO, so that the transition from a large group of EDOs to a Lead with several alternate EDOs can be smooth.

b. Tracking of Improvement Items Identified by the Licensee

The licensee has completed Nuclear Practices and Procedures Procedure (NPPP)-ADMIN-016, Actions to Support the Emergency Preparedness Program. The procedure outlines the responsibilities of various members of the EP staff, the responsible Department Head, and the person assigned primary responsibility to complete a required task for the EP staff. The Emergency Planning Activity Scheduling System (EPASS) will not be used to assign actions on NRC commitments, which will be addressed per procedure NPPP-ADMIN-005. Items identified as overdue on the EPASS will be brought to the attention of the Assistant Vice President, Nuclear on a monthly basis. Supplementary Instruction (SI) procedure 0100.07.00 has been completed and addressed the EP staff's use of the computerized EPASS. The inspector received sample outputs of the EPASS. The formats of the output were undergoing final revision. Full implementation of the EPASS was scheduled for later in October 1985.

The licensee's progress on the EPASS is acceptable.

c. Upgraded Goals and Objectives Program

The objective of implementing the Corporate Emergency Plan and completing the associated training has been completed as scheduled, with the exception that the initial drill of the corporate organization has been postponed to early December 1985. The corporate emergency organization's training was relatively unaffected by the changes in the licensee's Nuclear Mission organization.

The licensee has made significant progress on the goal of improving the qualifications of the EP staff. Final selection of an Emergency Preparedness Manager and an Emergency Planning Supervisor has been completed, and both persons were functioning in their new positions. Their staff has been greatly expanded and divided into the following areas of responsibility: offsite emergency planning; onsite emergency planning; corporate emergency planning; computer programming support; general support; and clerical support. Only one clerical position remained open. The EP staff was a mixture of current Toledo Edison employees and persons hired from other organizations. Technical backgrounds included emergency preparedness; chemistry and health physics; nuclear plant operations; nuclear plant training; and computer programming. All key staff will be onboard by the end of the year. Position descriptions have been prepared, and included an appropriate amount of time for personal development.

Regarding the goal of finalizing the boundary of the plume exposure pathway Emergency Planning Zone (EPZ), the licensee was awaiting word through the Ohio Disaster Services Agency on the Federal Emergency Management Agency's evaluation of the proposed, revised EPZ boundary.

4. Completion Status of the Technical Support Center (TSC)

The licensee's present TSC was located in the Davis-Besse Administration Building (DBAB) which was outside the protected area. During October 1985 the licensee was conducting a feasibility study to determine whether one or several workspaces within the Control Room's emergency ventilation system envelope could be reconfigured into a TSC, to be manned by three or four key TSC personnel and several communicators/status board plotters. The remainder of the TSC staff, primarily engineering support personnel, would remain in the DBAB's TSC and would possibly become part of the Emergency Control Center (ECC) staff. The licensee's current thinking was that the following persons could function from a TSC located within the protected area: Station Manager, Chemistry and Health Physics Superintendent, and the Engineering Support Director and/or OSC Manager. Also, the OSC Manager could perform his duties by traveling between the onsite TSC and OSC. The inspectors toured those areas within the Control Room's emergency ventilation system envelope which had thus far been identified as possible locations for TSC staff. Since the feasibility study was in progress, it was very premature to conclude whether or not the various workspaces identified during the inspection could be transformed into an adequate TSC. The inspectors did understand, however, the new management's desire to relocate key TSC from the DBAB into the protected area. The inspectors had the following concerns:

- The Order confirming the licensee's commitment to implement those post-TMI items set forth in Supplement 1 to NUREG-0737 indicated that the TSC and ECC (licensee's EOF) are now completed, except for implementing Regulatory Guide 1.97 modifications. The licensee should formally inform the NRR Project Manager that the TSC, and possibly the ECC, should not be considered complete at least until the licensee has decided whether or not to propose a new TSC within the protected area.

- The licensee's feasibility study should address the workspace and communications equipment needs of NRC Site Team personnel who would have to be located with their licensee counterparts within an onsite TSC.

- The licensee should reevaluate the desirability of having an OSC Manager travel between the OSC and TSC, as this could create problems in command and control of OSC activities and also increase the potential for introducing contamination inside the Control Room, onsite TSC, and the OSC.

The licensee indicated that it would review the results of the onsite TSC feasibility study and would then inform the NRC of its conclusion before proceeding further.

5. Revision to the Emergency Plan and Implementing Procedures

The licensee was in the process of formulating significant changes to the plan and implementing procedures, primarily involving the onsite (including DBAB) emergency organization and the Station's Emergency Action Levels (EALs). The inspectors were given a copy of a proposed Davis-Besse emergency organization chart. The inspectors discussed changes evident from the chart; proposed changes in the method of transferring EDO responsibilities from the SS to the DBAB's Emergency Director; and the licensee's current thinking on completing the plan and procedure revisions and related training. The inspectors were told that emergency organization changes would take place regardless of whether or not certain TSC personnel would be stationed in the DBAB's TSC or in a future onsite TSC. Also, the proposed emergency organization would have significantly fewer examples of individuals identified as the primary for one position and as an alternate for one or more other positions.

The tentative schedule for completion of the revised plan and implementing procedures was early April and early May 1985, respectively. Completion of all related training would take several additional months. The licensee indicated that it would probably formally request an exemption from completing certain emergency preparedness requalification training within the annual period, pending completion of the revised plan and procedures. The inspectors indicated that all first and second quarter emergency preparedness training for 1986 should not be delayed, especially for operations personnel, and that the licensee's proposal should be detailed and submitted in a timely manner prior to January 1986 to allow for adequate evaluation by NRC staff.

6. Licensee Action on Previously-Identified Items

(Closed) Open Item (346/82-01-18): The station's seismic monitoring capability must be upgraded; related procedures written; and required training provided. This item had remained open pending revision of one of three procedures associated with the seismic monitoring system and completion of related training on the revised procedure. The inspector determined that the anticipated procedure revision was not required and had not taken place and that all appropriate personnel had completed classroom and hands-on training using the current procedure revisions within the annual period. This item is considered closed.

7. Exit Interview

On October 11, 1985, the inspectors discussed their preliminary findings with those licensee representatives identified in Paragraph 1. The licensee indicated that none of the matters discussed were proprietary in nature. The licensee agreed to inform Regional staff of its decision regarding the relocation of the TSC. The licensee also agreed that, if

necessary, it would submit a formal request for delaying completion of certain annual emergency preparedness training requirements. The licensee would also provide a schedule for completion of the next Emergency Plan and related implementing procedure revisions, and associated training on these revisions.