

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-254/86005(DRSS); 50-265/86005(DRSS)

Docket Nos. 50-254; 50-265

Licenses No. DPR-29; DPR-30

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Quad Cities Nuclear Generating Station, Units 1 and 2

Inspection At: Quad Cities Station, Cordova, IL

Inspection Conducted: March 11-14, 1986

Inspector: J. P. Patterson

W.G. Snell for

3/27/86
Date

Approved By: W. G. Snell, Acting Chief
Emergency Preparedness Section

W.G. Snell

3/27/86
Date

Inspection Summary

Inspection on March 11-14, 1986 (Reports No. 50-254/86005(DRSS);
50-265/86005(DRSS))

Areas Inspected: Routine unannounced inspection of the following areas of the emergency preparedness program: licensee actions on previously identified items; activations of the emergency plan; changes to the emergency preparedness program; knowledge and performance of duties (training); and licensee audits.

The inspection involved 27 inspector-hours onsite by one NRC inspector.

Results: No violations, deficiencies, or deviations were identified as a result of this inspection.

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DETAILS

1. Persons Contacted

- *N. Kalivianakis, Station Manager
- *T. Tamlyn, Services Superintendent
- *D. Gibson, Quality Assurance Supervisor
- *G. Spedl, Assistant Superintendent of Technical Services
- *H. Toren, Station GSEP Coordinator
- *M. Kooi, Compliance Coordinator
- W. Graham, Principal Instructor
- K. Spitzer, Quality Assurance Engineer
- G. Price, Staff Assistant to Maintenance Superintendent
- D. Rajceovich, Master Instrument Mechanic

*Indicates those attending the March 14, 1986 exit interview.

2. Licensee Actions on Previously Identified Items

(Closed) Open Items No. 254/84018-02; 265/84016-02: Additional training was needed for Control Room personnel on the methodology used to classify gaseous effluent releases according to EAL Condition 17. The inspector confirmed that revised training for Emergency Operating Procedures (EOPs) had been given to control room personnel. Better guidance was provided in the form of a list of performance objectives, which included a provision for the calculation of the proper Generating Station Emergency Plan (GSEP) classification when given the net monitor readings of the main stack, wind speed, main chimney flow rate and estimated release time. These performance objectives were also incorporated into the EOP walkdown training, which included implementing procedures QEP 330-9, "Estimating Plant Release using the Stack Gas Monitor" and QEP 330-12, "Calculating Main Chimney Noble Gas Release Rates Under Post Accident Conditions from SPING Monitor Readings." This item is closed.

(Closed) Open Items No. 254/84018-06; 265/84016-06: This item concerned the need to develop and implement adequate guidance for formulating follow-up messages to offsite governmental agencies to assure that message content conforms to guidance in GSEP Section 6.1 and NUREG-0654. A review of Procedure QEP 310-T12, Revision 1, determined that it was now sufficient to ensure the content of the follow-up messages conforms to the above guidance. This item is closed.

(Closed) Open Items No. 254/85010-01; 265/85010-01: Two individuals designated as alternate Maintenance Directors had not received the annually required emergency response training as required by GSEP Section 8.2 and 10 CFR 50.47b(15). This resulted in a Severity Level V violation (Supplement 1) being assessed in a June 1985 inspection, Inspection Reports No. 254/85010; 265/85010. Training records were reviewed by the inspector who confirmed that these two individuals have now received the required training. Changes in the training program to ensure training is conducted as required in the future is discussed in Section 5 of this report. The licensee's response to this violation is satisfactory and the item is closed.

(Closed) Open Items No. 254/85010-02; 265/85010-02: The prior inspection in June 1985 determined that most of the 16 individuals who were assigned functions in the GSEP had an inadequate knowledge of the five learning objectives listed in Section 8.2 of the GSEP. The dissemination of this GSEP information for training by means of self-study seemed an ineffective methodology of accomplishing the training objectives. The inspector's evaluation of several changes in the training program, which are described further in Section 5 of this report, concluded that revised methods to present this material corrected the problem. This item is closed.

(Closed) Open Items No. 254/85015-02; 265/85017-02: Some workers were not adequately instructed in proper radiological protection methods when using protective clothing. This was a 1985 annual exercise finding. Training demonstrations in donning and removing anti-contamination clothing have been conducted in the OSC by HP Rad/Chem personnel. Training in completion of a Radiation Work Permit (RWP) and other safety-related functions including key control for certain rooms were also included. The inspector's evaluation of this training concluded that the additional training was satisfactory. This item is closed.

3. Activations of the Emergency Plan

The inspector reviewed and evaluated nine activations of the GSEP, which occurred between June and March 1985; plus one event which occurred on August 15, 1984. All nine of these activations of the Emergency Plan were Notices of Unusual Events (NUEs), and were all correctly classified based on the appropriate Emergency Action Level (EAL). Notifications were made to State, Counties, and the NRC within the required times. The following open items are now closed: 254/840XX-08, 254/850XX-03, 254/850XX-04, 254/850XX-05, 254/850XX-06, 254/850XX-07, 254/850XX-08, 265/850XX-03, 265/850XX-04.

4. Changes to the Emergency Preparedness Program

The inspector reviewed the licensee's program for initiating changes to the GSEP, the Quad Cities Annex to GSEP, and the emergency plan implementing procedures (QEP series). The provisions for reviewing the QEPs are established by administrative (QAP series) procedures. The training supervisor is now a member of the Onsite Review Committee (OSRC) which reviews and approves the QEPs prior to final issue. Four current QEP procedures were selected by the inspector to review for management approval, distribution, and updating. All were distributed and submitted to the NRC within 30 days of the effective date.

Revisions to the GSEP and the Quad Cities Annex are currently under review by the licensee. Station input is due by April 1, 1986 for review by the corporate office; with a goal of June 1, 1986 for submittal to the NRC. The projected issue for Revision 6 is by August 1986. The inspector reviewed some of these station generated changes to the GSEP and the Quad Cities Annex and found them meaningful and constructive.

Through discussion with the Emergency Preparedness Coordinator (EPC) and relevant documentation, the inspector concluded that the only meaningful organizational change relating to emergency preparedness (EP) was the EPC himself. Mr. Harme Toren was appointed as EPC in October 1985. Mr. Toren was an EP instructor in the training department before assuming this position, and is leaving the company on March 21, 1986. The inspector met with the Assistant Superintendent of Technical Services to emphasize NRC's concern that this vital position be filled as soon as possible. Also, this concern was stated at the exit interview to other plant management representatives. Management's reply was that they did consider it an important position and would not delay finding a qualified candidate.

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

5. Knowledge and Performance of Duties (Training)

The inspector reviewed the changes made in the GSEP training program since the previous inspection in June 1985. From discussions with the EPC and a review of selected training records and internal documentation it was determined that: (1) A revised GSEP training program matrix has been developed to more accurately identify which EP courses are required for each emergency response position; (2) Specific lesson plans have been developed and proceduralized for each GSEP position, and were officially authorized on October 31, 1985; (3) All designated emergency response directors and alternates have been trained in the new lesson plans and revised QEPs as part of their GSEP training; (4) The GSEP Training Procedure, QEP 520-1, has been revised to redefine the scope and training requirements for emergency response personnel at the plant; and, (5) A summary of the training standards, courses, and retraining frequencies required for the specialized training programs will be included in Revision 6 of the GSEP. As listed in Section 4 of this report, station GSEP input for this area and others are due by April 1, 1986 prior to review by the corporate office and submittal to NRC.

Since the previous inspection, significant effort has been put into upgrading the quality and objectivity of the station's input into the GSEP training. Although most of the impetus for these actions was the result of an internal independent audit finding (Audit No. QAO 4-85-19 dated June 5, 1985), the licensee's training program has been improved.

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

6. Licensee Audits

The inspector reviewed an independent audit conducted by the plant quality assurance department in June 1985, Audit No. QAO-4-85-19. The audit area included the Station Emergency Plan and Procedures, GSEP,

Revision 4, and the Quad Cities Station Emergency Plan Annex, Revision 5, dated December 1984. One finding resulting from the audit was that neither the GSEP nor the Quad Cities Station Emergency Plan Annex described specialized training and retraining programs for all categories of emergency response positions. The violation identified in the June 1985 inspection, and described in Section 2 of this report, reinforced the fact that there were weaknesses in the training program. However, as described in Section 5, the licensee is now in the completion stages of Revision 6 to the GSEP, which includes a revised Section 8.2 and a revised GSEP training matrix to alleviate this condition. Specific lesson plans for each GSEP position have also been finalized.

Another portion of the annual independent review was conducted by licensee representatives not assigned to Quad Cities Station. This phase of the audit included a review of emergency response drills and exercises, as well as training of offsite support agencies. An all encompassing training session for Quad Cities support agencies including representatives from the States of Illinois and Iowa and the U.S. Coast Guard, was held on October 16, 1985. The inspector reviewed documentation of this session and concluded that all required areas of the offsite agencies audit program relating to 10 CFR Part 50.54(t) requirements were met through that training session/meeting. Also, the licensee has a system to track items identified as improvement or corrections resulting from drills or the annual exercises.

The audit finding from the June 1985 audit has resulted in a cooperative effort by corporate, site training, and the Production Training Center to correct and improve basic facets of the emergency preparedness training program. The licensee has, through this audit finding and the positive approach by those responsible for the program, demonstrated the importance of a good working, independent audit program.

The inspector also verified, through interviews and a review of audit correspondence, that a follow-up action policy on the audit finding on training is being followed on a monthly basis by the QA Audit Department to inform management of the progress and/or delays in completing these issues. This audit report and follow-up correspondence are distributed to the Quad Cities Station Manager, Corporate Director of Quality Assurance, Manager of Production-Nuclear Station, and three Vice President or Assistant-Vice President levels. Thus all levels of management are currently informed of the audit results.

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

7. Exit Interview

The inspector held an exit interview on March 19, 1986 with licensee representatives denoted in Section 1 of this report. The inspector determined from licensee management representatives that none of the information discussed was proprietary in nature. The inspector discussed the scope and findings of the inspection, and his preliminary findings indicated that no violations or deviations from commitments were identified.