# December 16, 2003

Mr. T. Palmisano Site Vice President Monticello Nuclear Generating Plant Nuclear Management Company, LLC 2807 West County Road 75 Monticello, MN 55362-9637

SUBJECT: MONTICELLO NUCLEAR GENERATING PLANT

NRC EMERGENCY PREPAREDNESS INSPECTION

REPORT 05000263/2003007(DRS)

Dear Mr. Palmisano:

On November 21, 2003, the NRC completed an inspection at your Monticello Nuclear Generating Plant. The enclosed report documents the inspection findings, which were discussed on November 21, 2003, with you and members of your staff.

The inspection examined activities conducted under your license as they relate to safety and compliance with the Commission's rules and regulations and with the conditions of your license. The inspectors reviewed selected procedures and records, observed activities, and interviewed personnel. Specifically, this inspection focused on emergency preparedness, including your staff's determinations of performance indicators for the Emergency Preparedness Cornerstone.

On the basis of the results of this inspection, no findings of significance were identified.

In accordance with 10 CFR Part 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <a href="http://www.nrc.gov/reading-rm/adams.html">http://www.nrc.gov/reading-rm/adams.html</a> (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief Plant Support Branch Division of Reactor Safety

Docket No. 50-263 License No. DPR-22

Enclosure: Inspection Report 05000263/2003007(DRS)

See Attached Distribution

cc w/encl: J. Cowan, Executive Vice President

and Chief Nuclear Officer Manager, Regulatory Affairs

J. Rogoff, Esquire, Vice President, Counsel and Secretary

Nuclear Asset Manager, Xcel Energy, Inc. Commissioner, Minnesota Department of Health

R. Nelson, President

Minnesota Environmental Control Citizens

Association (MECCA)

Commissioner, Minnesota Pollution Control Agency

D. Gruber, Auditor/Treasurer,

Wright County Government Center

Commissioner, Minnesota Department of Commerce

Manager - Environmental Protection Division

Minnesota Attorney General's Office

W. Curtis, FEMA, Region V

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# U.S. NUCLEAR REGULATORY COMMISSION

# **REGION III**

Docket No: 50-263 License No: DPR-22

Report No: 05000263/2003007(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Monticello Nuclear Generating Plant

Location: 2807 West Highway 75

Monticello, MN 55362

Dates: November 17 through November 21, 2003

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector

R. Alexander, Radiation Protection Inspector

R. Orlikowski, Resident Inspector

Observers: D. Melendez, Intern

T. Powell, Intern

Approved by: Kenneth Riemer, Chief

Plant Support Branch Division of Reactor Safety

#### SUMMARY OF FINDINGS

IR 05000263/2003007(DRS); 11/17/03 - 11/21/03; Monticello Nuclear Generating Plant; Emergency Preparedness Specialist Report.

The report covers a one-week baseline inspection by one regional emergency preparedness inspector, a radiation protection inspector, and a resident inspector. The inspection focused on the Emergency Preparedness Cornerstone in the Reactor Safety strategic performance area during the biennial emergency preparedness exercise. This inspection also included a review of records related to the three emergency preparedness performance indicators for the period July 1, 2002 through September 30, 2003. No findings of significance were identified.

The NRC's program for overseeing the safe operation of commercial nuclear power reactors is described in NUREG-1649, "Reactor Oversight Process," Revision 3, dated July 2000.

Α.	Inspector-Identified and Self-Revealed I	<u>Findings</u>

None.

# B. Licensee-Identified Violations

None.

# **REPORT DETAILS**

# 1. REACTOR SAFETY

**Cornerstone: Emergency Preparedness** 

1EP1 Exercise Evaluation (71114.01)

#### a. <u>Inspection Scope</u>

The inspectors reviewed the November 18, 2003 biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's emergency plan and to verify that the exercise's simulated problems provided an acceptable framework to support demonstration of the licensee's capability to implement its plan. The inspectors also reviewed a summary of an emergency preparedness drill, which was conducted on October 8, 2003, to determine whether that scenario was sufficiently different from the scenario used in the November 18, 2003 exercise.

The inspectors evaluated the licensee's exercise performance, focusing on the risk-significant activities of emergency classification, notification, and protective action decision making, as well as implementation of accident mitigation strategies in the following emergency response facilities:

- Control Room Simulator (CRS);
- Technical Support Center (TSC);
- Operations Support Center (OSC); and
- Emergency Operations Facility (EOF).

The inspectors also assessed the licensee's recognition of abnormal plant conditions, transfer of responsibilities between facilities, internal communications, interfaces with offsite officials, readiness of emergency facilities and related equipment, and overall implementation of the licensee's emergency plan.

The inspectors attended post-exercise critiques in the TSC, OSC, and EOF to evaluate the licensee's initial self-assessment of its exercise performance. The inspectors later met with the licensee's lead exercise evaluators to obtain the licensee's refined assessments of its exercise participants' performances. These self-assessments were then compared with the inspectors' independent observations and assessments to assess the licensee's ability to adequately critique station performance during the exercise.

# b. Findings

No findings of significance were identified.

#### 4. OTHER ACTIVITIES

# 4OA1 Performance Indicator (PI) Verification (71151)

# a. <u>Inspection Scope</u>

The inspectors reviewed the licensee's records related to each of the three emergency preparedness PIs to verify that the licensee's program was implemented consistent with the industry guidelines in Nuclear Energy Institute publication No. 99-02, "Regulatory Assessment Performance Indicator Guideline," Revision 2, and related licensee procedures. Specifically, licensee records related to the performance of the Alert and Notification System (ANS), key Emergency Response Organization (ERO) members' drill participation, and Drill and Exercise Performance (DEP) were reviewed to verify the accuracy and completeness of the PI data submitted to NRC for the period from July 2002 through September 2003.

# b. <u>Findings</u>

No findings of significance were identified.

#### 4OA2 Identification and Resolution of Problems

The following performance concerns, which could have adversely impacted response activities if scenario events had been real, were independently identified by the licensee and by the inspectors during the November 18, 2003 exercise:

- The initial notification message to State and county officials did not indicate that a simulated, unplanned, minor release of radioactive gas was associated with the Alert declaration.
- The TSC's management did not clearly communicate the relative priorities of missions assigned to teams deployed from the OSC to OSC and EOF counterparts.
- A revised Protective Action Recommendation, which involved areas roughly five to 10 miles downwind of the site, should have been communicated to offsite officials about five to ten minutes sooner.

#### 4OA6 Meetings

#### .1 Exit Meeting

An exit meeting was conducted for:

Emergency Preparedness with Mr. T. Palmisano and other members of licensee management and staff at the conclusion of the inspection on November 21, 2003. The licensee acknowledged the information presented. No proprietary information was identified.

# .2 Public and Media Briefing

 On November 21, 2003, an inspector summarized the NRC's preliminary conclusions on the licensee's exercise and critique performances at a public and media briefing hosted by Federal Emergency Management Agency staff in Buffalo, Minnesota.

ATTACHMENT: SUPPLEMENTAL INFORMATION

#### SUPPLEMENTAL INFORMATION

# **KEY POINTS OF CONTACT**

#### Licensee

- M. Antony, Design Engineering Manager
- R. Baumer, Compliance Engineer
- T. Cooper, Nuclear Oversight Assessor
- G. Holthaus, Emergency preparedness Coordinator
- B. MacKissock, Operations Manager
- D. Neve, Regulatory Affairs Manager
- T. Palmisano, Site Vice President
- D. Pedersen, Emergency Planning Manager
- J. Purkis, Plant Manager
- R. VanNell, Information Technology Manager
- M. Vonk, Corporate Senior Emergency Planning Specialist

# LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened	and	Closed
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None.

Discussed

None.

#### LIST OF DOCUMENTS REVIEWED

The following is a list of documents reviewed during the inspection. Inclusion on this list does not imply that the NRC inspectors reviewed the documents in their entirety but rather that selected sections of portions of the documents were evaluated as part of the overall inspection effort. Inclusion of a document on this list does not imply NRC acceptance of the document or any part of it, unless this is stated in the body of the inspection report.

#### 1EP1 Exercise Evaluation

Monticello Nuclear Generating Plant Exercise Scenario Manual; November 2003

1

Narrative Summary and Time Line of an October 8, 2003 Practice Drill

Monticello Nuclear Generating Plant Emergency Plan; Revision 23

A.2-001; Emergency Organization; Revision 48

A.2-101; Classification of Emergencies; Revision 30

- A.2-103; Alert; Revision 16
- A.2-104; Site Area Emergency; Revision 15
- A.2-105; General Emergency; Revision 16
- A.2-106; Activation and Operation of the TSC; Revision 22
- A.2-107; Activation and Operation of the OSC; Revision 22
- A.2-108; Access Control During Emergencies; Revision 12
- A.2-201; On-site Protective Action; Revision 10
- A.2-204; Off-site Protective Action Recommendations; Revision 16
- A.2-205; Personnel Accountability; Revision 11
- A.2-206; Work Control During Emergencies; Revision 4
- A.2-209; Responsibilities of the Radiological Emergency Coordinator; Revision 14
- A.2-210; Engineering Support in the TSC; Revision 7
- A.2-213; Responsibilities of the Emergency Director; Revision 10
- A.2-301; Emergency Evacuation; Revision 13
- A.2-401; Emergency Exposure Control; Revision 8
- A.2-501; Communications During an Emergency; Revision 14
- A.2-801; Responsibilities of the Emergency Manager; Revision 5
- A.2-802; Activation and Operation of the EOF; Revision 5
- A.2-803; Emergency Communications at the EOF; Revision 5
- A.2-805; Technical Support in the EOF; Revision 4
- A.2-806; Radiation Protection Support in the EOF; Revision 5
- A.2-807; Off-site Dose Assessment and Protective Action Recommendations; Revision 10
- CR 03011818; Draft Critique Report of November 18, 2003 Biennial Exercise
- CR 03011822; During the November 18 Exercise, the Notification Form to State and County Officials Did Not Indicate That the Alert Event Involved a Simulated Release

2 Attachment

CR 03011828; Protective Action Recommendation Error During November 18 Exercise

CR 03011840; During November 18 Exercise, Participants Had Difficulties Performing Off-site Dose Projections

CR 03011849; During the November 18 Exercise, a Scenario Inject Message Was Issued by an Off-site Official About an Off-site Toxic Gas Release Without Proper Preplanning With Licensee Exercise Controllers

# 4OA1 Performance Indicator Verification

Emergency Planning Work Instruction 01.06; Emergency Plan Performance Indicator Program; Revision 4

Surveillance Procedure 1409; Public Alert Notification System Monthly Siren Activation Testing; Revisions 9 and 10

Completed Samples of Surveillance Procedure 5791-800-01; Siren Observation Worksheet; Revision 2

Surveillance Procedure 1359; Public Alert Notification System Weekly Signal Test; Revision 10

Form 1359; Public Alert Notification System Weekly Signal Test Records; July 2002 Through September 2003

Records of Monthly Siren Full Activation Tests; July 2002 Through September 2003

Quarterly Records of Key ERO Members' Drill and Exercise Participation; July 2002 Through September 2003

Records of DEP Performance Indicator Opportunities and Associated Licensee Assessments; July 2002 Through September 2003

CR 02006364; One Siren Failed to Activate During June and July 2002 Monthly Tests

CR 03002467; 31 of 47 Sirens in Wright County Indicated Failure During a March 2003 Monthly Test

CR 03004106; Signal Transmission Problem Affecting Wright County Sirens on April 16, 2003

CR 03004267; One Siren Did Not Provide Proper Feedback Signal During an April 2003 Test

CR 03008153; One Wright County Siren Failed During a Monthly Test in August 2003

CR 03001881; Incorrect Emergency Classification During a February 2003 DEP Indicator Opportunity

3 Attachment

# LIST OF ACRONYMS USED

ANS Alert and Notification System

CR Condition Report

CRS Control Room Simulator

DEP Drill and Exercise Performance
EOF Emergency Operations Facility
ERO Emergency Response Organization

NUREG Nuclear Regulatory Guide
OSC Operational Support Center
PI Performance Indicator
TSC Technical Support Center

USNRC United States Nuclear Regulatory Commission

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