July 12, 2004

Mr. Joseph Solymossy Site Vice-President Prairie Island Nuclear Generating Plant Nuclear Management Company, LLC 1717 Wakonade Drive East Welch, MN 55089

SUBJECT: PRAIRIE ISLAND NUCLEAR GENERATING PLANT, UNITS 1 AND 2

NRC EMERGENCY PREPAREDNESS INSPECTION

REPORT 05000282/2004006(DRS); 05000306/2004006(DRS)

Dear Mr. Solymossy:

On June 18, 2004, the NRC completed an inspection at your Prairie Island Nuclear Generating Plant. The enclosed report documents the inspection findings, which were discussed on June 18, 2004, 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 2.390 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 http://www.nrc.gov/reading-rm/adams.html (the Public Electronic Reading Room).

Sincerely,

/RA/

Kenneth Riemer, Chief Plant Support Branch Division of Reactor Safety

Docket Nos. 50-282; 50-306 License Nos. DPR-42; DPR-60

Enclosure: Inspection Report 05000282/2004006(DRS);

05000306/2004006(DRS)

cc w/encl: C. Anderson, Senior Vice President, Group Operations

J. Cowan, Executive Vice President and Chief Nuclear Officer

Regulatory Affairs Manager

J. Rogoff, Vice President, Counsel & Secretary

Nuclear Asset Manager

Tribal Council, Prairie Island Indian Community Administrator, Goodhue County Courthouse Commissioner, Minnesota Department

of Commerce

Manager, Environmental Protection Division Office of the Attorney General of Minnesota

W. King, FEMA Region V

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See Attached Distribution

DOCUMENT NAME: G:DRS\Pra 2004 006 DRS.wpd

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cc w/encl: C. Anderson, Senior Vice President, Group Operations

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U.S. NUCLEAR REGULATORY COMMISSION REGION III

Docket Nos: 50-282; 50-306 License Nos: DPR-42; DPR-60

Report No: 05000282/2004006(DRS); 05000306/2004006(DRS)

Licensee: Nuclear Management Company, LLC

Facility: Prairie Island Nuclear Generating Plant, Units 1 and 2

Location: 1717 Wakonade Drive East

Welch, MN 55089

Dates: June 14 through June 18, 2004

Inspectors: T. Ploski, Senior Emergency Preparedness Inspector

R. Jickling, Emergency Preparedness Inspector

S. Burton, Senior Resident Inspector

Observers: L. Haeg, Engineer

D. Tharp, Resident Inspector

Approved by: K. Riemer, Chief

Plant Support Branch Division of Reactor Safety

SUMMARY OF FINDINGS

IR 05000282/2004006(DRS), 05000306/2004006(DRS); 06/14/2004 - 06/18/2004; Prairie Island Nuclear Generating Plant, Units 1 & 2; Emergency Preparedness Specialist Report.

The report covers a one-week baseline inspection by two regional emergency preparedness inspectors 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 January 1, 2003 through March 31, 2004. 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.

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Α.	Inspector-Identified and Self-Revealed Findings	

None.

B. <u>Licensee-Identified Violations</u>

None.

REPORT DETAILS

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness

1EP1 Exercise Evaluation (71114.01)

a. <u>Inspection Scope</u>

The inspectors reviewed the June 2004 biennial emergency preparedness exercise's objectives and scenario to ensure that the exercise would acceptably test major elements of the licensee's radiological 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 records of emergency preparedness drills, which were conducted between January 2003 and May 2004, to determine whether those drills' scenarios were sufficiently different from the scenario used in the June 16, 2004 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;
- 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 determine the licensee's ability to adequately critique its exercise performance.

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 associated with 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 January 2003 through March 2004. The following PIs were reviewed:

Common

- ANS:
- ERO Drill Participation; and
- DEP.

b. <u>Findings</u>

No findings of significance were identified.

4OA2 Identification and Resolution of Problems

The following performance concern, which could have adversely impacted response activities if scenario events had been real, was independently identified by the licensee and by the inspectors during the June 2004 exercise:

• The need to develop a revised protective action recommendation to offsite officials should have been recognized by EOF staff about five minutes sooner.

4OA6 Meetings

.1 Exit Meeting

An exit meeting was conducted for Emergency Preparedness with Mr. J. Solymossy and other members of licensee management and staff at the conclusion of the inspection on June 18, 2004. The licensee acknowledged the information presented. No proprietary information was identified.

.2 Public and Media Briefing

On June 18, 2004, 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 Red Wing, Minnesota.

ATTACHMENT: SUPPLEMENTAL INFORMATION

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee

- J. Solymossy, Site Vice President
- M. Werner, Plant Manager
- M. Agen, Emergency Planning Coordinator
- R. Alexander, Licensing Engineer
- T. Allen, Production Planning Manager
- J. Anderson, Radiation Protection Manager
- S. Cook, Nuclear Oversight Manager
- B. Ellison, Shift Manager
- P. Huffman, Operations Manager
- J. Kapitz, Nuclear Engineering Supervisor
- J. Payton, Emergency Planning Coordinator
- M. Pfeffer, Emergency Planning Instructor
- G. Salamon, Regulatory Affairs Manager
- T. Silverberg, Business Manager
- S. Skoyen, Emergency Planning Manager
- T. Taylor, Performance Manager
- M. Vonk, Corporate Emergency Planning Specialist

LIST OF ITEMS OPENED, CLOSED AND DISCUSSED

Opened and Closed	
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.

<u>1EP1</u> Exercise Evaluation

June 16, 2004 Exercise Scenario Manual

May 2004 Emergency Plan Drill Critique Report; dated June 8, 2004

November 2003 Emergency Plan Drill Critique Report; dated December 10, 2003

January 2003 Emergency Plan Drill Critique Report; dated February 26, 2003

Draft June 2004 Summary of Exercise Findings and Observations Report; dated June 17, 2004

- F3-1; Onsite Emergency Organization; Revision 21
- F3-2; Classification of Emergencies; Revision 35
- F3-4; Responsibilities During Alert, Site Area Emergency, or General Emergency; Revision 30
- F3-5; Emergency Notifications; Revision 22
- F3-6; Activation and Operation of the TSC; Revision 18
- F3-7; Activation and Operation of the OSC; Revision 17
- F3-8; Recommendations for Offsite Protective Actions; Revision 20
- F3-10; Personnel Accountability; Revision 21
- F3-12; Emergency Exposure Control; Revision 15
- F3-15; Responsibilities of Radiation Survey Teams During an Airborne Radioactive Release; Revision 24
- F3-24; Records Keeping During an Emergency; Revision 7
- F8-1; EOF Organization; Revision 7
- F8-2; Responsibilities During an Alert, Site Area Emergency, or General Emergency in the EOF; Revision 8
- F8-3; Activation and Operation of the EOF; Revision 6
- F8-5; Offsite Dose Assessment and Protective Action Recommendations; Revision 8
- F8-6; Radiological Monitoring and Control at the EOF; Revision 7
- F8-10; Records Keeping in the EOF; Revision 2
- Nuclear Oversight Observation Report 2003-001-6-021; Emergency Planning; dated February 6, 2003
- CAP 028118; Identified Improvement in Mini-Drill Evaluation; dated February 6, 2003

SA 032073; Perform Evaluated Exercise Readiness Assessment

CAP 036778; Concerns to be Addressed in Advance of June 2004 Evaluated Exercise

4OA1 Performance Indicator Verification

Prairie Island Plant Drill and Exercise Performance Monthly Records; January 2003 through March 2004

Monthly Fixed Siren Trend Reports; January 2003 through March 2004

Monthly Records of Key ERO Drill and Exercise Participation; January 2003 through March 2004

3 Attachment

LIST OF ACRONYMS USED

ADAMS Agencywide Documents Access and Management System

ANS Alert and Notification System

CR Condition Report

DEP Drill and Exercise Performance
EOF Emergency Operations Facility
ERO Emergency Response Organization
NRC Nuclear Regulatory Commission

NUREG Nuclear Regulatory Guide
OSC Operations Support Center
PARS Publically Available Records

PI Performance Indicator
TSC Technical Support Center

4 Attachment