

# UNITED STATES NUCLEAR REGULATORY COMMISSION

REGION II SAM NUNN ATLANTA FEDERAL CENTER 61 FORSYTH STREET, SW, SUITE 23T85 ATLANTA, GEORGIA 30303-8931

May 5, 2006

EA-06-071

Virginia Electric and Power Company ATTN: Mr. David A. Christian Sr. Vice President and Chief Nuclear Officer Innsbrook Technical Center - 2SW 5000 Dominion Boulevard Glen Allen, VA 23060-6711

SUBJECT: SURRY POWER STATION - NRC EMERGENCY PREPAREDNESS

INSPECTION REPORT 05000280/2006008 AND 05000281/2006008;

PRELIMINARY WHITE FINDING

Dear Mr. Christian:

On March 29, 2006, the U. S. Nuclear Regulatory Commission (NRC) completed an inspection at your Surry Power Station, Units 1 and 2. The enclosed inspection report documents the inspection findings, which were discussed on March 29, 2006, Mr. D. Jernigan, Site Vice President, and other members of his staff by teleconference.

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. The inspection also included a review of the circumstances involving the failure of the Surry full-scale Exercise Critique to identify a weakness associated with a risk-significant planning standard (RSPS) that was determined to be a Drill/Exercise Performance (DEP) - Performance Indicator (PI) opportunity failure.

Based on the NRC's review of this issue, the failure of the licensee's full-scale Exercise Critique to identify a weakness associated with a RSPS that was determined to be a DEP PI opportunity failure is a performance deficiency and an apparent violation associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.54(b)(4), and the requirements of 10 CFR 50, Appendix E, IV.F.2.g.

This finding was assessed using the applicable Emergency Preparedness Significance Determination Process (SDP) and was preliminarily determined to be of low-to-moderate safety significance (White) because the planning standard (PS) function was lost in that the critique failed to identify a DEP PI opportunity failure during a full-scale exercise, where there are multiple emergency response facilities (ERFs) participating and a team of evaluators as discussed in NRC Manual Chapter 0609, Section 4.14. Additional details associated with this determination are discussed in Section 1EP1 of the enclosed inspection report.

VEPCO 2

Before we make a final decision on this matter, we are providing you an opportunity to: (1) present to the NRC your perspectives on the facts and assumptions, used by the NRC to arrive at the finding and its significance, at a Regulatory Conference or (2) submit your position on the finding to the NRC in writing. If you request a Regulatory Conference, it should be held within 30 days of the receipt of this letter and we encourage you to submit supporting documentation at least one week prior to the conference in an effort to make the conference more efficient and effective. If a Regulatory Conference is held, it will be open for public observation. The NRC will also issue a press release to announce the conference. If you decide to submit only a written response, such submittal should be sent to the NRC within 30 days of the receipt of this letter.

Please contact Mr. Brian Bonser at (404) 562-4653 within 10 business days of the date of your receipt of this letter to notify the NRC of your intentions. If we have not heard from you within 10 days, we will continue with our significance determination decision and you will be advised by separate correspondence of the results of our deliberations on this matter.

Since this finding is an apparent violation of NRC requirements, escalated enforcement action is being considered in accordance with the NRC Enforcement Policy. The current Enforcement Policy is included on the NRC's Web site at <a href="https://www.nrc.gov">www.nrc.gov</a>; select What We Do, Enforcement, then Enforcement Policy.

Since the NRC has not made a final determination in this matter, no Notice of Violation is being issued for this inspection finding at this time. In addition, please be advised that the number and characterization of apparent violations described in the enclosed inspection report may change as a result of further NRC review.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your response (if any) will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of the 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/

Victor M. McCree, Director Division of Reactor Safety

Docket Nos. 50-280, 50-281

License Nos. DPR-32 and DPR-37

Enclosure: Inspection Report 05000280/2006008, and 05000281/2006008

w/Attachment: Supplemental Information

cc w/encl: See page 3

VEPCO 3

cc w/encl:

Chris L. Funderburk, Director Nuclear Licensing and Operations Support Virginia Electric & Power Company Electronic Mail Distribution

Donald E. Jernigan Site Vice President Surry Power Station Virginia Electric & Power Company Electronic Mail Distribution

Virginia State Corporation Commission Division of Energy Regulation P. O. Box 1197 Richmond, VA 23209

Lillian M. Cuoco, Esq. Senior Counsel Dominion Resources Services, Inc. Electronic Mail Distribution

Attorney General Supreme Court Building 900 East Main Street Richmond, VA 23219

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VEPCO 2

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Victor M. McCree, Director Division of Reactor Safety

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w/Attachment: Supplemental Information

cc w/encl: See page 3

(\*) - SEE PREVIOUS FOR CONCURRENCES

☐ PUBLICLY AVA	AILABLE	□ NON-PUI	BLICLY AVAILABLE		☐ SENSITIVE	□ NON-SENS	ITIVE
ADAMS: □ Yes	ACCESSION NU	IMBER:		-			
OFFICE	RII:DRS	HQS	RII:DRS	RII:DRS	RII:EICS		

OFFICE	RII:DRS	HQS	RII:DRS	RII:DRS	RII:EICS		
SIGNATURE	RA	RA	RA	RA	RA		
NAME	JKREH	NSANFILIPPO	LMILLER	BONSER	CEVANS		
DATE	4/26/2006	4/26/2006	5/3/2006	5/4/2006	4/27/2006		
E-MAIL COPY?	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO	YES NO

# U. S. NUCLEAR REGULATORY COMMISSION REGION II

Docket Nos.: 50-280, 50-281

License Nos.: DPR-32, DPR-37

Report No: 05000280, 05000281/2006008

Licensee: Virginia Electric and Power Company (VEPCO)

Facility: Surry Power Station

Location: 5850 Hog Island Road

Surry, VA 23883

Dates: February 6 - March 29, 2006

Inspectors: Lee Miller, Senior Emergency Preparedness Inspector

(Section 1EP1,1EP4)

James Kreh, Emergency Preparedness Inspector (Section 1EP1)

Nathan Sanfilippo, Emergency Preparedness Specialist

(Section 1EP1, 4OA1)

Approved by: Brian R. Bonser, Chief

Plant Support Branch 2 Division of Reactor Safety

## SUMMARY OF FINDINGS

IR 05000280/2006008, 05000281/2006008; 02/06-10/2006; Surry Power Station, Units 1 and 2; Exercise Evaluation.

The report covered an announced inspection by a team of three emergency preparedness inspectors. One apparent violation (AV) item with potential safety significance greater than Green, was identified. The significance of most findings is indicated by their color (Green, White, Yellow, Red) using Inspection Manual Chapter (IMC) 0609, "Significance Determination Process" (SDP). Findings for which the SDP does not apply may be Green or be assigned a severity level after NRC management review. 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.

# A. <u>NRC-Identified and Self-Revealing Findings</u>

Cornerstone: Emergency Preparedness

• TBD. The NRC identified an AV for failure of the licensee's exercise critique process to properly identify a weakness associated with a risk-significant planning standard (RSPS) that was determined to be a Drill/Exercise Performance (DEP) Performance Indicator (PI) opportunity failure during a full-scale exercise. The AV is associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.47(b)(4), and the requirements of 10 CFR 50, Appendix E, IV.F.2.g. This finding was not entered into the licensee's corrective action program.

The failure of the licensee's exercise critique process was a performance deficiency. This finding was greater than minor because it was associated with the Emergency Preparedness Cornerstone. The finding affects the associated cornerstone objective to ensure that the licensee was capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The finding was an identified weakness that demonstrated a level of performance that could preclude effective implementation of the Emergency Plan in an actual emergency. This finding was also determined to potentially have greater significance because the licensee's exercise critique process failed to properly identify a weakness associated with a RSPS that was determined to be a DEP PI opportunity failure during a full-scale exercise. (Section 1EP1)

B. Licensee-Identified Violations.

None

#### REACTOR SAFETY

Cornerstone: Emergency Preparedness

## 1EP1 Exercise Evaluation

#### a. Inspection Scope

Prior to the inspection activity, the inspectors conducted an in-office review of the exercise objectives and scenario submitted to the NRC to determine if the exercise would test major elements of the emergency plan as required by 10 CFR 50.47(b)(14). This inspection activity represents one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of the licensee's performance in the biennial exercise conducted on February 7, 2006, was reviewed and assessed regarding the implementation of the RSPSs in 10 CFR 50.47 (b) (4), (5), (9), and (10), which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of the licensee's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the Control Room simulator, Technical Support Center (TSC), Operational Support Center (OSC) and Emergency Operations Facility (EOF).
- Other performance areas besides the RSPS, such as the emergency response organization's (ERO) recognition of abnormal plant conditions, command and control, intra- and inter-facility communications, prioritization of mitigation activities, utilization of repair and field monitoring teams, interface with offsite agencies, and the overall implementation of the emergency plan and its implementing procedures.
- Past performance issues from NRC inspection reports and Federal Emergency Management Agency (FEMA) exercise reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10 CFR 50.47(b)(14).
- The post-exercise critique conducted February 9, 2006, to evaluate the licensee's self-assessment of its ERO performance during the exercise and to ensure compliance with 10 CFR 50 Appendix E.IV.F.2.g

The inspectors reviewed various documents which are listed in the Attachment to this report.

#### b. Findings

<u>Introduction.</u> The inspectors identified an apparent violation associated with emergency preparedness planning standards 10 CFR 50.47(b)(14) and 10 CFR 50.47(b)(4), and the requirements of 10 CFR 50, Appendix E, IV.F.2.g.

<u>Description.</u> The Emergency Preparedness cornerstone licensee response band is established by the PI system and the licensee's corrective action program. Data for the DEP and ERO PI values come from the drill and exercise critiques. The baseline inspection program is based on accurate PI data that properly reflects licensee performance. The DEP PI is based on the licensee's ability to determine whether a PI opportunity is successful or not. A single failure to identify a weakness associated with an RSPS during a full-scale exercise is a high standard based on NRC's need to ensure the efficacy of the licensee's critique program. Thus, a licensee's ability to observe, evaluate, and critique a weakness associated with an RSPS is critical.

The inspectors identified a risk-significant performance deficiency involving a failure of the licensee's exercise critique process to identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure. In the post exercise critique conducted on February 7, 2006, the licensee failed to identify that the Station Emergency Manager (SEM) declared a Site Area Emergency (SAE) without verifying and validating the Emergency Action Level (EAL) conditions; and that the operating crew failed to effectively communicate to the SEM that a second seismic event had not occurred at the time of the turbine blading and turbine casing failure.

The SEM declared an SAE using on EPIP-1.01, Emergency Manager Controlling Procedure, Tab L-1. Tab L addresses event categories of Natural Events. Tab L-1's condition/applicability is for earthquakes greater than Design Basis Earthquake (DBE) levels for plant conditions above cold shutdown conditions. Indications of earthquakes greater than DBE levels are "earthquake activates Event Indicator on Strong Motion Accelerograph AND safety-related systems are significantly degraded by earthquake OR AP-37.00, Seismic Event, calculations indicate horizontal motion of 0.15g or greater." The SEM assumed that a second seismic event occurred without validating the information from the control room alarms. The inspectors based the SEM assumption on hearing the SEM's statement during the exercise prior to the SAE declaration. The SEM made the statement after receiving reports that vibrations were felt coming from the floor/ground. Significant floor vibration is expected in the event of a turbine blading failure that penetrates the turbine casing. As event conditions changed that could meet emergency classification escalation criteria the SEM should have evaluated the event category, and selected the proper EAL Tab associated with the event category.

Without a second seismic event of DBE magnitude, the correct classification of the turbine blading failure and damage to safety-related structures and equipment would have been at the Alert level. Since the facility was already in an Alert status, no change in the emergency response level was necessary. The inspectors determined that the EAL used to make the classification by the exercise participants for SAE was an incorrect EAL classification based on the event conditions and the indications available.

The licensee stated on March 1, 2006, that there was clear indication that the control room operators had checked the accelerograph and noted that it did not alarm from the perceived "aftershock." The licensee also indicated that there was no sense of urgency to report a "non-alarm" and that usually only actual alarms were priority actions. The information that a seismic event had not occurred was not communicated with the TSC (as confirmed by the licensee's interview with the SEM in the TSC).

The licensee counted the incorrect classification as a DEP PI opportunity success. The licensee's critique stated that the classification for SAE was made under an EAL Tab other than the one anticipated by the scenario, but that the classification was a successful DEP PI opportunity. The licensee's corrective action document, Plant Issue S-2006-0465, did not capture the weak or deficient areas identified by the inspectors nor did it address the PI failure for the declaration of an SAE when the EAL for the event only supported an Alert classification.

Analysis. The licensee's exercise critique process failure is a performance deficiency. This finding was greater than minor because it affects the Emergency Preparedness Cornerstone objective that ensures that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency. The finding is an identified weakness that demonstrated a level of performance that could preclude effective implementation of the Emergency Plan in an actual emergency. This finding is also determined to potentially have greater significance because the licensee's exercise critique process failed to properly identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure during a full-scale exercise.

The inspectors assessed the finding using the Emergency Preparedness Significance Determination Process, IMC 0609 Process, Appendix B, and preliminarily determined the finding to be of low to moderate safety significance (White). The exercise critique process that failed to identify a weakness associated with an RSPS that was determined to be a DEP PI opportunity failure during a full-scale exercise, where there are multiple ERFs participating and a team of evaluators, represents a loss of PS function. Appendix B sheet 1, Failure to Comply, and section 4.14, 10 CFR 50.47(b)(14) were used to reach the preliminary determination.

<u>Enforcement.</u> 10 CFR 50.47(b)(14) requires, in part, that periodic exercises be conducted to evaluate major portions of emergency response capabilities and that deficiencies identified as a result of exercises are corrected.

10 CFR 50.47(b)(4) requires, in part, that a standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and that State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial offsite response measures.

10 CFR 50, Appendix E, IV.F.2.g requires that all training, including exercises, shall provide for formal critiques in order to identify weak or deficient areas that need correction. Any weaknesses or deficiencies that are identified shall be corrected.

Contrary to the above, during the critique of the February 7, 2006, exercise, the licensee failed to identify a DEP PI opportunity failure, in that the licensee counted an incorrect classification as an opportunity success. The incorrect classification should be considered a missed opportunity or opportunity failure.

This finding is identified as Apparent Violation (AV) 50-280, 50-281/2006008-001, Failure of Exercise Critique to identify a RSPS weakness as a DEP PI opportunity Failure. This issue has not yet been entered into the licensee's corrective action system.

# 1EP4 Emergency Action Level (EAL) and Emergency Plan Changes

#### a. Inspection Scope

The inspectors review of revisions to the emergency plan, implementing procedures and EAL changes was performed for determining that changes had not decreased the effectiveness of the plan. The inspectors also evaluated the associated 10 CFR 50.54(q) reviews associated with non-administrative emergency plan, implementing procedures and EAL changes. The Surry Power Station Emergency Plan, revision 50 was reviewed.

The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 04, "Emergency Action Level and Emergency Plan Changes." The applicable PS, 10 CFR 50.47(b)(4) and its related 10 CFR 50, Appendix E requirements were used as reference criteria. The criteria contained in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," Revision 1, Regulatory Guide 1.101 were also used as references. This inspection activity represents one sample on an annual basis.

The inspectors reviewed various documents which are listed in the Attachment to this report.

## b. Findings

Introduction. The inspectors identified that the licensee's 10 CFR 50.54(q) evaluation for Revision 44 of the Surry Emergency Plan completed in October 2000 resulted a potential decrease in effectiveness (DIE) of the emergency plan. The change is potentially a DIE in that it may be overly conservative in such a way as to place members of the public at unnecessary risk during evacuation of an area unaffected by a radiological release which would be more appropriately recommended for sheltering. This is an unresolved item (URI) pending completion of further NRC staff review.

<u>Description.</u> On October 31, 2000, the licensee implemented an Emergency Plan change that modified the minimum or default Protective Action Recommendation (PAR) upon declaration of a General Emergency to evacuate to 5 miles in all directions. The change replaced the licensee's previous "standard" minimum PAR based on NRC and FEMA guidance, which used the "keyhole" approach (i.e., evacuate all sectors to 2 miles and downwind sectors 2-5 miles) with an evacuation to 5 miles in all directions.

The licensee's 10 CFR 50.54(q) review stated that the revised PAR scheme "continues to meet the standards of 10 CFR 50.47(b)(10) because it is based on a process endorsed by the Federal Emergency Management Agency and the Nuclear Regulatory Commission. This guidance is contained in Supplement 3 ... to NUREG-0654/FEMA-REP-1 ..., which was issued for interim use and comment on August 26, 1996." However, Supplement 3 to NUREG-0654 does not appear to contain any explicit or implicit quidance that would support the licensee's rationale for adopting the revised PAR methodology. The bases for the change were that (1) expanding the keyhole concept to a 5-mile, 360° approach would avoid complications in situations where the wind direction straddles two sectors and precludes the need for modification of the PAR in the event of shifts in wind direction and (2) that this was a process simplification desired by the State. The licensee further reasoned that this minimum PAR for a General Emergency (GE) would bound any associated radiological consequences in terms of an initial PAR. The essence of this rationale was that "more conservative is better". The subject change represents a potential DIE in that it may be overly conservative in such a way as to place members of the public at unnecessary risk during evacuation of an area unaffected by a radiological release which would be more appropriately recommended for sheltering.

Analysis. This finding affects the emergency preparedness cornerstone and was considered to be more than minor because, if left uncorrected, it could be a more significant safety concern. The Emergency Preparedness attribute of procedure quality was impacted. This, in turn, affects the Emergency Preparedness objective of ensuring that the licensee is capable of implementing adequate measures to protect the health and safety of the public in the event of a radiological emergency because the change made may be overly conservative in such a way as to place members of the public at unnecessary risk during evacuation of an area unaffected by a radiological release which would be more appropriately recommended for sheltering. Due to the nature of this issue (affecting the regulatory process), traditional enforcement would be applied instead of the SDP.

Enforcement. 10 CFR 50.54(q) states in part that the "licensee may make changes to these plans without Commission approval only if the changes do not decrease the effectiveness of the plans. Proposed changes that decrease the effectiveness of the approved emergency plans may not be implemented without application to and approval by the Commission." Contrary to the above, on October 31, 2000, the licensee made changes to their Emergency Plan, which appeared to reduce the effectiveness of the emergency plans. These changes were not submitted to the NRC for approval prior to implementation. Pending further NRC staff review the change in methodology for formulation of a PAR as implemented in Surry Emergency Plan Rev. 44, this finding is identified as URI 50-280, 50-281/2006008-002, Protective Actions for Severe Reactor Accidents.

#### 4. OTHER ACTIVITIES

## 4OA1 Performance Indicator (PI) Verification

## a. Inspection Scope

The inspectors reviewed the licensee's procedure for developing the data for the Emergency Preparedness PIs which are: (1) DEP; (2) ERO Drill Participation; and (3) Alert and Notification System (ANS) Reliability. The inspectors examined data reported to the NRC for the period October 1, 2005 to December 31, 2005. Procedural guidance for reporting PI information and records used by the licensee to identify potential PI occurrences were also reviewed. The inspectors verified the accuracy of the PI for ERO drill and exercise performance through review of a sample of drill and event records. The inspectors reviewed selected training records to verify the accuracy of the PI for ERO drill participation for personnel assigned to key positions in the ERO. The inspectors verified the accuracy of the PI for alert and notification system reliability through review of a sample of the licensee's records of periodic system tests.

The inspection was conducted in accordance with NRC Inspection Procedure 71151, "Performance Indicator Verification." The applicable planning standard, 10 CFR 50.9 and Nuclear Energy Institute (NEI) 99-02, Revision 3, "Regulatory Assessment Performance Indicator Guidelines," were used as reference criteria. This inspection activity represents three samples on an annual basis.

The inspectors reviewed various documents which are listed in the Attachment to this report.

## b. Findings

No findings of significance were identified.

## 4OA6 Meetings, including Exit

On February 10, 2006, the team lead for the Emergency Preparedness Inspection presented the inspection results to Mr. D. Jernigan, Surry Site Vice President, and other members of his staff who acknowledged the findings; but requested that they be able to provide additional information concerning proposed findings. The team lead stated that additional information would be accepted and reviewed. The inspectors confirmed that proprietary information was not provided or taken during the inspection.

On February 22 and March 6, 2006 teleconferences were held between the licensee and inspectors to provide information to NRC concerning the proposed findings.

The licensee also provided materials for consideration electronically on February 17, March 14, and March 15, 2006.

On March 29, 2006, the team lead for the Emergency Preparedness Inspection presented the inspection results to Mr. D. Jernigan, Surry Site Vice President, and other members of his staff by teleconference. The inspectors confirmed that proprietary information was not provided or taken during the inspection.

ATTACHMENT: SUPPLEMENTAL INFORMATION

## SUPPLEMENTAL INFORMATION

# **KEY POINTS OF CONTACT**

#### Licensee personnel

- D. Jernigan, Site Vice President
- W. Renz, Director Nuclear Protection Services & Emergency Preparedness
- B. McBride, Manager Emergency Preparedness
- J. Costello, Supervisor Nuclear Emergency Preparedness
- C. Luffman, Manager Nuclear Protection Services
- R. Savedge, Emergency Planning Specialist
- J. Gram, Manager Nuclear Oversight
- M. Adams, Director Nuclear Safety and Licensing
- B. Garber, Licensing Supervisor
- T. Hube, Manager Nuclear Engineering
- B. Stanley, Manager Nuclear Engineering
- W. Matthews, Supervisor Nuclear Operations

## NRC personnel

- L. Plisco, Deputy Regional Administrator, Region II
- H. Christensen, Deputy Director, Division of Reactor Safety
- N. Garrett, Senior Resident Inspector, Surry Nuclear Power Station
- D. Arnett, Resident Inspector, Surry Nuclear Power Station

## LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

## **Opened**

05000280, 281/2006008-01 AV Failure of Exercise Critique to identify a RSPS weakness

as a DEP PI opportunity Failure (Section 1EP1)

05000280, 281/2006008-02 URI Protective Actions for Severe Reactor Accidents.

(Section 1EP4)

Closed

NONE

Discussed

NONE

A-1 Attachment

#### LIST OF DOCUMENTS REVIEWED

## Section 1EP1: Exercise Evaluation

#### Plans and Procedures

EPIP-1.01, Emergency Manager Controlling Procedure, Rev. 47

EPIP-1.06, Protective Action Recommendations, Rev. 6

EPIP-2.01, Notification of State and Local Governments, Rev. 34

EPIP-3.02, Activation of Technical Support Center, Rev. 26

EPIP-3.03, Activation of Operational Support Center, Rev. 13

EPIP-3.04, Activation of Local Emergency Operations Facility, Rev. 16

EPIP-4.07, Protective Measures, Rev. 10

CPIP-3.3, Surry LEOF Activation, Rev. 10

CPIP-6.0, LEOF Recovery Manager Guidance, Rev. 8

#### Plant Issues

S-2006-0467, Hand calculation per EPIP 4.08, suppressed by facilitator and MIDAS quick dose assessment projections overly conservative

S-2006-0465, Classification for Site Area Emergency, "L-1" vice "K-10"

S-2006-0463, LEOF HVAC system damper failed during 2006 Emergency Drill

S-2006-0452, Some equipment used during Medical scenario was missing, broken, or not usable

S-2006-0448, MIDAS in TSC became inoperable

S-2006-0446, Technical Specification discrepancy was identified TS3.1.D.4 specifies a report made IAW Technical Specification 6.6.A.2 which has been deleted.

S-2006-0443, CEOF X-terminal workstations (24 and 29) were unable to display PCS data

S-2006-0469, Ongoing self assessment of Surry Power Station self-assessment

# Miscellaneous

EPIP-2.01, Attachment 2, Report of Emergency to State and Local Governments, Messages 1-7 from 02/07/2006 exercise
Consolidated licensee chronology of 02/07/2006 exercise

Surry Power Station February 7, 2006 Emergency Exercise Critique Results

Section 1EP4: Emergency Action Level (EAL) and Emergency Plan Changes

# Plans and Changes packages

Surry Nuclear Station Emergency Plan, Rev. 50

10 CFR 50.54(q) Review Va Power Form 723551(Sep 95)

Interface Consensus Document: Planning Bases for Selected Radiological Emergency Response Coordination Activities, Rev. 6

Interface Consensus Document: Planning Bases for Selected Radiological Emergency Response Coordination Activities, Rev. 63

A-2 Attachment

# Miscellaneous

Offsite Protective Action Recommendation (PAR) Formulation Process, January 20, 2000 Offsite Protective Action Recommendation (PAR) Formulation Process, September 23, 1999 Change package for North Anna and Surry Power Station Emergency Plans

# Section 4OA1: Performance Indicator (PI) Verification

## Procedures

DNAP-2605, Emergency Preparedness Performance Indicators, Rev. 2 O-LSP-EW-001, Early Warning System Polling Functional Test, Rev. 7

## Records

ANS testing 10/1/05 - 12/31/05 ERO Personnel Participation 8/25/04, 12/6/05, 7/13/05 DEP Opportunities 10/1/05 - 12/31/05 Emergency Exercise Scenario, December 6, 2005

A-3 Attachment

## LIST OF ACRONYMS

ANS Alert and Notification System

AV Apparent Violation

DEP Drill/Exercise Performance
DIE Decrease in Effectiveness
EAL Emergency Action Level
EOF Emergency Operations Facility
ERFs Emergency Response Facilities

GE General Emergency

ERO

IMC Inspection Manual Chapter

NCV Non-Cited Violation
NEI Nuclear Energy Institute

NRC Nuclear Regulatory Commission OSC Operational Support Center

PAR Protective Action Recommendation

**Emergency Response Organization** 

PI Performance Indicator
PS Planning Standard

RSPS Risk Significant Planning Standard

SAE Site Area Emergency

SDP Significance Determination Process

SEM Station Emergency Manager TSC Technical Support Center

FEMA Federal Emergency Management Agency

URI Unresolved Item