

December 22, 2004

Mr. Mark E. Warner
Site Vice President
c/o James M. Peschel
FPL Energy Seabrook, LLC
Seabrook Station
P.O. Box 300
Seabrook, NH 03874

SUBJECT: SEABROOK STATION - NRC EVALUATED EMERGENCY PREPAREDNESS
EXERCISE - INSPECTION REPORT NO. 05000443/2004007

Dear Mr. Warner:

On November 18, 2004, the US Nuclear Regulatory Commission (NRC) completed an inspection at your Seabrook Station. The enclosed inspection report documents the inspection findings, which were discussed on November 18, 2004, with yourself and other 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.

Based on the results of this inspection, no findings of significance were identified.

In accordance with 10CFR2.390 of the NRC's "Rules of Practice," a copy of this letter and its enclosure 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 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 by Richard J. Conte Acting for/

John R. White, Chief
Security, Emergency Preparedness and
Radiological Protection Branch
Division of Reactor Safety

Docket No. 50-443
License No. NPF-86

Enclosure: Inspection Report No. 05000443/2004007
w/Attachment: Supplemental Information

cc w/encl:

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FEMA Region I

Mr. Mark E. Warner

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U. S. NUCLEAR REGULATORY COMMISSION REGION I
REGION I

Docket No: 50-443

License No: NPF-86

Report No: 05000443/2004007

Licensee: FPL Energy Seabrook, LLC

Facility: Seabrook Station

Location: P. O. Box 300
Seabrook, NH 03874

Dates: November 16 - 18, 2004

Inspectors: D. Silk, Sr. Emergency Preparedness Inspector, DRS (Lead)
J. McFadden, Sr. Radiation Protection Inspector, DRS
G. Dentel, Sr. Resident Inspector, Seabrook Station, DRP
S. Dennis, Sr. Operations Engineer, DRS

Observers: K. Diederich, Reactor Inspector, DRS
J. Kulp, Reactor Inspector, DRS
T. Wingfield, Reactor Engineer, DRP

Approved by: John R. White, Chief
Security, Emergency Preparedness and
Radiological Protection Branch
Division of Reactor Safety

Enclosure

SUMMARY OF FINDINGS

IR 05000443/2004-007; 11/16/2004-11/18/2004; Seabrook Station; Emergency Preparedness Exercise; Emergency Preparedness Performance Indicators.

This inspection was conducted by region-based inspectors and the resident inspector. No findings of significance were identified using IMC 0609, Significance Determination Process (SDP). 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. NRC-Identified Findings

Cornerstone: Emergency Preparedness

None.

B. Licensee-Identified Findings

None.

Report Details

1. REACTOR SAFETY

Cornerstone: Emergency Preparedness (EP)

1EP1 Exercise Evaluation (71114.01)

a. Inspection Scope

Prior to the exercise, an in-office review was conducted 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 the completion of one sample on a biennial cycle.

The onsite inspection consisted of the following review and assessment:

- The adequacy of Florida Power and Light's (FPL) performance in the biennial full-participation exercise regarding the implementation of the risk-significant planning standards (RSPS) in 10 CFR 50.47 (b) (4), (5), (9) & (10) which are emergency classification, offsite notification, radiological assessment, and protective action recommendations, respectively.
- The overall adequacy of FPL's emergency response facilities with regard to NUREG-0696, "Functional Criteria for Emergency Response Facilities" and Emergency Plan commitments. The facilities assessed were the simulator, the Technical Support Center (TSC), the Operations Support Center (OSC), the Emergency Operations Facility (EOF), and the Media Center (MC).
- 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 FPL's drill reports to determine effectiveness of corrective actions as demonstrated during this exercise to ensure compliance with 10CFR50.47(b)(14).
- The post-exercise critique to evaluate FPL's self-assessment of its ERO performance during the exercise and to ensure compliance with 10CFR50 Appendix E.IV.F.2.g.

The inspectors reviewed various documents which are listed in Attachment 1 to this report.

Enclosure

b. Findings

No findings of significance were identified.

4. OTHER ACTIVITIES (OA)

4OA1 Performance Indicator (PI) Verification (71151)

a. Inspection Scope

The inspectors reviewed data for the EP PIs which are: (1) Drill and Exercise Performance (DEP); (2) ERO Drill Participation; and (3) Alert and Notification (ANS) Reliability. The inspector reviewed supporting documentation from drills and ANS testing in the fourth quarter of 2003 and the first three quarters in 2004 to verify the accuracy of the reported data. The review of these performance indicators was conducted in accordance with NRC Inspection Procedure 71151. The acceptance criteria used for the review were 10 CFR 50.9 and NEI 99-02, Revision 2, Regulatory Assessment Performance Indicator Guidelines.

b. Findings

No findings of significance were identified.

4OA2 Identification and Resolution of Problems (71152: PI&R Sample)

a. Inspection Scope

The inspectors reviewed FPL's critique findings as documented in condition reports from 2002 through 2004. This review was conducted to determine if significant performance trends exist and to determine the effectiveness of licensee corrective actions based upon ERO performance during this exercise. The inspectors verified that issues identified during this exercise were entered into FPL's corrective action program and are listed in an attachment to this report. The inspection was conducted in accordance with NRC Inspection Procedure 71114, Attachment 01; 10 CFR 50.47(b)(14); and Appendix E IV.F.2.g were used as reference criteria

b. Findings and Observations

No findings of significance were identified.

4OA6 Meetings, Including Exit

The inspectors presented the inspection results to Mr. M. Warner, Site Vice President, and other members of the licensee's staff at the conclusion of the inspection on November 18, 2004. The licensee had no objections to the NRC observations. No proprietary information was provided to the inspectors during this inspection.

ATTACHMENT

SUPPLEMENTAL INFORMATION

KEY POINTS OF CONTACT

Licensee Personnel

S. Perkins-Grew, Emergency Preparedness Manager
D. Young, Nuclear Emergency Planning Coordinator

LIST OF ITEMS OPENED, CLOSED, AND DISCUSSED

Opened, Closed, Discussed

None

LIST OF DOCUMENTS REVIEWED

Section 1EP1: Exercise Evaluation

Seabrook Station Emergency Plan
Emergency Plan Implementing Procedures

Section 4OA2: Identification and Resolution of Problems

CR Number Description of Condition

- | | |
|----------|--|
| 04-11335 | Framatome pager did not activate. Guard Island officer performing activation was peer-checked by the Controller to ensure appropriate message was entered via telephone. |
| 04-11337 | GN1332.00 Form D, Step 15b, references incorrect area code for Framatome office telephone number. Area code is listed as 978 but should be 508. |
| 04-11398 | The TSC post drill critique was not particularly self-critical. Most of the critical comments came from the controllers who commented during the players critique versus after. |
| 04-11420 | This condition report documents an NRC observation from the 2004 Exercise - the inspector felt that the OSC Coordinator could demonstrate better command and control and improve facility performance by 1) providing more facility briefings, 2) better adherence to the BRIEF format, 3) periodically reviewing and emphasizing response priorities, and 4) providing the oversight necessary to complete the actions assigned by the TSC. |
| 04-11453 | The OSC public address system did not function properly in the 2004 Exercise. |
| 04-11709 | This condition report documents miscellaneous Media Center facility comments from the 2004 Exercise. |

- 04-11397 There were some distractions during TSC briefs. ER 3.1, Technical Support Center Operations, provides guidance for minimizing distractions, phone usage and 3-way communication.
- 04-11417 The OSC lack a individual with clear control and command.
- 04-11419 The OSC used radio channels that were not consistent with drill expectations. Confusion at the start of the exercise lead to two radio channels being used where the expectation was one.
- 04-11435 The TSC Work Control Supervisor cancelled some OSC teams without first informing the Site Emergency Director.
- 04-11452 Some individuals responded early to their emergency response facility (i.e., during the Unusual Event).
- 04-11357 Area for Improvement for future drill/exercise activities at MEMA. See additional information below.
- 04-11368 Nuclear Oversight identified opportunities for improvement at the Emergency Operating Facility in the areas of communication, use of human performance tools, and job (assignment) turnovers. See attached for details.
- 04-11395 An Emergency Preparedness Technical Specialist from Omaha Public Power District (OPPD) recommended an area for improvement at the Media Center would be to utilize medical experts and other professionals to assist in addressing issues concerning public health and safety. (See additional information)
- 04-11396 Communication and coordination of the search for the containment leak was weak between the TSC, OSC and the operating crew.
- 04-11399 The TSC directed the Administrative Building ventilation to be shutdown for radiological concerns. Should the Assembly Area and Security Building be considered also? ER 3.1, "TSC Operations" HP Coordinator Checklist only provides general direction which relies on past experience.
- 04-11400 Towards the end of the 2004 E-Plan Graded Drill, the simulator indicated high containment building level resulting in an Critical Safety Function Orange Path Z.2 . Is this representation accurate or a simulator problem?
- 04-11411 The Alert press release stated "All safety systems are operating . . . ", and the General Emergency press release stated that " . . . degrading plant conditions activated emergency systems." The language of these statements should be assessed for acceptability and reviewed with the Emergency News Managers.
- 04-11422 The OSC personnel were unclear of the expectations on how to document, if necessary, the use of "simulated Individuals". (See additional information)
- 04-11425 This condition report documents Operating Experience for future review. Engineering personnel in the TSC missed several opportunities for improving the emergency response; 1) identification of COP-V-10 as a possible release point, 2) manually placing CEVA on recirc earlier, and 3) calling out an engineer with expertise in building ventilation systems.
- 04-11427 Conduct a quick hit self-assessment to evaluate the format of the position checklists contained in the SSER. Obtain input from key decision-makers (e.g., SED's, RM's, etc.) and revise procedures as needed.
- 04-11433 There was confusion on the status of repair actions for 1-CBS-P-9-A. As a result, no repair activities were performed for several hours after the Alert was declared. This delayed returning the pump to service.

- 04-11441 The HP Coordinator's high workload prevented the delivery of dosimetry stored at the site to the EOF.
- 04-11442 Media Center briefings sometimes did not provide proper context for information (i.e., help promote better understanding by the media and public). This condition was discussed in the post-exercise facility critique and the Lead Controller has the details.
- 04-11727 This condition report documents miscellaneous OSC facility comments.
- 04-11763 This condition report documents miscellaneous TSC facility comments.
- 04-11897 A Nuclear Oversight EP Technical Specialist from Omaha Public Power District (OPPD) considered the visual aids used during the Press Conferences at the Media Center ineffective. His observation from the back of the room was that the visual aids were illegible and that he could not make out any detail on the EPZ map or the plant graphic. He also questioned the size of the facility in the event of an actual emergency.
- 04-11937 This condition report documents scenario and drill implementation improvement items from the 2004 Exercise.

LIST OF ACRONYMS

ANS	Alert and Notification System
CFR	Code of Federal Regulations
DEP	Drill and Exercise Performance
ERO	Emergency Response Organization
EOF	Emergency Operations Facility
EP	Emergency Preparedness
ERO	Emergency Response Organization
FPL	Florida Power and Light
MC	Media Center
NRC	Nuclear Regulatory Commission
OSC	Operations Support Center
PI	Performance Indicator
RSPS	Risk Significant Planning Standard
TSC	Technical Support Center