

January 29, 1999

COMMISSION VOTING RECORD

DECISION ITEM: SECY-98-274

TITLE: COMMONWEALTH EDISON COMPANY'S PROPOSAL TO CENTRALIZE ITS EMERGENCY OPERATIONS FACILITIES AT ITS CORPORATE OFFICES

The Commission (with all Commissioners agreeing) approved the subject paper as recorded in the [Staff Requirements Memorandum \(SRM\)](#) of January 29, 1999.

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Commissioners, and the SRM of January 29, 1999.

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Annette L. Vietti-Cook  
Secretary of the Commission

Attachments: 1. Voting Summary  
2. Commissioner Vote Sheets  
3. Final SRM

cc: Chairman Jackson  
Commissioner Dicus  
Commissioner Diaz  
Commissioner McGaffigan  
Commissioner Merrifield  
OGC  
EDO  
PDR  
DCS

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VOTING SUMMARY - SECY-98-274

RECORDED VOTES

	<b>APRVD</b>	<b>DISAPRVD</b>	<b>ABSTAIN</b>	<b>NOT PARTICIP</b>	<b>COMMENTS</b>	<b>DATE</b>
CHRM. JACKSON	X				X	12/23/98
COMR. DICUS	X				X	12/11/98
COMR. DIAZ	X				X	12/10/98
COMR. McGAFFIGAN	X				X	12/16/98
COMR. MERRIFIELD	X				X	12/8/98

COMMENT RESOLUTION

In their vote sheets, all Commissioners approved the staff's recommendation and provided some additional comments. Subsequently, the comments of the Commission were incorporated into the guidance to staff as reflected in the SRM issued on January 29, 1999.

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### Commissioner Comments on [SECY-98-274](#)

#### Chairman Jackson's Comments on [SECY-98-274](#)

I approve of the proposal made by Commonwealth Edison to Centralize its Emergency Operations Facilities. I join with Commissioners Merrifield and McGaffigan in cautioning that my approval of this proposal is based on the specific circumstances of the Commonwealth Edison case and should not be construed as an approval of the concept generically. Further, the staff should remain sensitive to management and organizational changes within Commonwealth Edison which may result in reductions of technical or managerial expertise at the corporate office due, for instance, to downsizing or the transfer of personnel to plant sites.

#### Commissioner Dicus Comments on [SECY-98-274](#)

I approve the proposed consolidation of the ComEd nearsite EOFs to a CEOF in Downers Grove with the following comment:

After establishing the interim EOF, ComEd continued, for various reasons, to have difficulty accomplishing the EOF activation goal of one hour. Although ComEd has made considerable improvement in staffing timeliness of the Interim EOF since 1996, consistent success in meeting the timeliness goals has not yet been achieved. As such, the staff should continue to focus the proper attention on ComEd's performance in this area until the goals are consistently achieved.

#### Commissioner Diaz' Comments on [SECY-98-274](#)

I approve option 2, which would permit Commonwealth Edison to consolidate its four nearsite emergency operations facilities into a single facility located at the corporate offices. As discussed by the staff, this proposal should not have a deleterious effect on the ability of local, federal, and state agencies to carry out their emergency response functions. Indeed, improvements in informatics and transportation infrastructure are increasingly reducing the significance of distances. Additionally, the concentration of the licensee's expertise at one central facility should result in an improved emergency response capability. I also note that the proposal will provide direct and measurable cost savings to both the NRC and the licensee, the budgets of which are ultimately funded by ratepayers, who are entitled to the best possible management and administration of regulatory activities.

#### Commissioner McGaffigan's Comments on [SECY-98-274](#)

I approve the staff's recommendation to accept the proposal by Commonwealth Edison to replace their four near-site EOFs with a corporate EOF. I agree with Commissioner Merrifield that Commission approval of this request should not be construed as a general approval of centralized EOFs.

The last "Con" item noted by the staff associated with the proposal was the potential need to reevaluate the location of the Lead Federal Agency's JOC or a FRMAC. The NRC should conduct such a review, but it should not be limited to this case. Following a plant emergency, the national media will fight for the closest possible site proximity, and instant and repeated access to those representing the Agency. In any case where the EOF and the media center are not co-located, Lead Federal Agency duties may become unmanageable without thorough planning and preparation. For sites with hardened EOFs, for example, the media center is actually much further from the site than the EOF and will present very similar problems.

#### Commissioner Merrifield's Comments on [SECY-98-274](#)

Commissioner Merrifield approves Option 2 as recommended by the staff. The staff should closely monitor the licensee's transition to a centralized EOF to ensure emergency response capabilities are not diminished. Once implemented, the staff should monitor the licensee's ability to meet the centralized EOF staffing requirements in a timely manner and ensure that communication and coordination between the licensee, public, as well as State, County, and Federal agencies are not adversely impacted by ComEd's centralized EOF approach. The Commission should be promptly informed of significant problems related to the ability of parties to carry out their emergency response responsibilities that are directly related to ComEd's centralized EOF approach.

The staff has indicated that approval of the proposal will likely result in an influx of proposals from other licensees in similar situations. As stated by the staff in the Paper, there are particular circumstances of the ComEd proposal that are unique. Thus, approval of this proposal should not be interpreted by the staff as the Commissioner Merrifield's support of the centralized EOF approach in all cases. The staff should carefully review proposals from other licensees on a case-by-case basis to ensure that emergency response, communication, and coordination are not adversely impacted by the proposals.