



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 10, 1991

Mr. A. Bert Davis
NRC Region III
799 Roosevelt Road
Glen Ellyn, Illinois 60137

SUBJECT: Dresden Station, Units 2 & 3, "Transmittal of Information
Pertaining to Dresden Station Emergency Preparedness Program"
NRC Docket Nos. 50- 237/249

Dear Mr. Davis:

In a continued effort to do a more thorough job of communicating with the Region in matters regarding our Emergency Preparedness activities, Commonwealth Edison is providing the following for your consideration. The attached material overviews actions taken in response to NRC expressed concerns as well as self-identified program improvements in Emergency Preparedness. The activities presented in the attachments are indicative of our commitment to the continued improvement of our Emergency Preparedness Program at Dresden Station.

If you have any questions regarding this correspondence, please contact Ms. Irene M. Johnson at (312) 294-8532 or Mr. Robert Carson at (312) 294-8662.

Very truly yours,

T. Schuster
Nuclear Licensing Administrator

Attachments

cc: R. Caniano - NRC Region III
T. Ploski - NRC Region III
B.L. Siegel - NRR Project Manager
W.G. Rogers - Senior Resident Inspector, Dresden
{NRC Document Control Desk

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ATTACHMENT A

SUMMARY OF STATION ACTIONS IN RESPONSE TO NRC CONCERNS

EXERCISE CRITIQUE INSPECTION (50-237/90007; 249-90008) (April 1990)

While no Emergency Preparedness Exercises were conducted during the SALP 10 period, the NRC identified three Open Items from the 1990 Exercise which were corrected in the SALP 10 period.

OPEN ITEM: Open Items 50-237/90007-01 and 50-237/90007-02 resulted from a failure to provide adequate contamination and exposure control while responding to a simulated resin spill as part of the 1990 Exercise.

CORRECTIVE ACTION STATUS: The Station conducted additional training for Radiation Protection Technicians (RPTs), Radiation Protection Supervisors and Operations Shift Supervisors using a new lesson plan, "Personnel Injury Response and Contamination Control." This new lesson plan comprises first aid practices, contamination control and exposure control. A supplemental training session was also provided by Radiation Management Consultants (RMC), focusing on first aid and contamination/exposure control.

Proper first aid, contamination control and exposure control were successfully demonstrated during the 1990 Medical Drill. These Open Items were closed in NRC Inspection Report 50-237/90018, 249/90018.

OPEN ITEM: Open Item 50-237/90007-03 resulted from fuel clad and RCS barrier degradation criteria in Emergency Action Levels (EALs) being too restrictive. Less restrictive criteria need to be developed and implemented to provide more rapidly identifiable indications of core damage and cladding failure to operating personnel.

CORRECTIVE ACTION STATUS: Changes have been made to Dresden Station's EALs, as described in the Dresden Station GSEP Annex. Additional criteria have been added for operating personnel to more rapidly assess fission product barrier degradation. The approved Annex has been reviewed by the NRC and was distributed at the close of the SALP 10 period. It is CECO's understanding that this item will not be closed by the NRC until all Commonwealth Edison Nuclear Stations, whose EALs are affected, have completed similar changes. Dresden Station and LaSalle County Station EALs have been changed, reviewed by the NRC and distributed. Changes to affected EALs for the remaining four stations are expected to be submitted for NRC review by the end of 1991.

ROUTINE EMERGENCY

PREPAREDNESS INSPECTION (50-237/91008; 249/91007)
(February 25 - 28, 1991)

OPEN ITEM: Open Item 50-237/91008-01. A new procedure for formal, quarterly inventory of Station aperture cards at the Mazon EOF had neither been performed or scheduled for performance as of the end of the inspection.

CORRECTIVE ACTION STATUS: The Station has added the inventory to their General Surveillance Tracking and Scheduling System. The surveillance is now automatically scheduled for performance each quarter.

RECOMMEND-
ATION:

During the inspection, it was noted by NRC personnel that the forms needed by Control Room personnel during an Emergency Event were stored in two different locations, each location maintaining a complete set of all forms needed. The inspector recommended that these two locations be consolidated into one location.

CORRECTIVE ACTION STATUS: Dresden Station agreed with the NRC Inspectors recommendation and has subsequently combined the two locations into one controlled satellite file location at the Control Room Center Desk.

RECOMMEND-
ATION:

Thermoluminescent Dosimeters (TLDs) are stored in the Operational Support Center (OSC) for an extended period of time. No provision exists for identifying a control TLD to establish a baseline dose for these badges. It is recommended that the Station establish a method for identifying a control TLD for badges stored in Emergency Response Facilities.

CORRECTIVE ACTION STATUS: The inventory procedure is being revised to include two extra TLDs as control badges. In the interim, Dresden Station Emergency Preparedness personnel are personally performing the inventory to ensure that two TLDs are added as control badges.

CONCERN:

A decontamination table is provided for use in emergency situations. The NRC Inspector was concerned that the table was stored in a remote area and was found to be in an "unacceptable state of readiness."

CORRECTIVE ACTION STATUS: Dresden Station agreed with the NRC Inspector that table's status was unacceptable. The table and the shielding were cleaned, covered and moved to an area outside of the door to the decontamination room, making them readily accessible if needed.

ROUTINE EMERGENCY

PREPAREDNESS INSPECTION: (50-237/91014; 50-249/91013)
(May 22 - 23, 1991)

This inspection entailed an evaluation of both Dresden Station's Meteorological Monitoring Program and the annual Medical Drill, held during the inspection period.

One concern resulted from inspection of the Meteorological Monitoring Program:

CONCERN: The instrumented Tower's location has changed several times since the program began in the 1960s. The program's description was significantly improved and accurate with one exception, in the draft revision to the Dresden Annex, which will be submitted for NRC review later this year. The tower's current location was inadequately described in the draft document. The tower's correct location was, however, correctly described in the current revision of the Dresden Annex. The licensee should ensure that the Dresden Annex retains an accurate description of the monitoring towers's location.

CORRECTIVE ACTION STATUS: The location of the Station's Meteorological Tower has been corrected in Revision 6 to the Dresden Annex. The Annex has been reviewed and accepted by the NRC and subsequently distributed.

Evaluation of the Medical drill resulted in one recommendation, with four examples cited:

**RECOMMEND-
ATION:**

The lack of controllers at several key locations caused needless confusion and detracted from the overall training benefits to be derived from the Medical Drill. The licensee should ensure that knowledgeable controllers are provided at all key locations, specifically:

- 1) When the Morris Hospital staff requested the helicopter from the Loyola Medical Center, they informed the helicopter dispatch that it was only a drill and the helicopter should not actually be sent. The staff person was unaware that arrangements had been made with Loyola to actually dispatch the helicopter, real-time. The presence of a controller at the Morris Hospital at the beginning of the drill would have likely resulted in the mistaken instructions given to Loyola to be corrected.

CORRECTIVE ACTION STATUS: Past practice has indicated that the scope of the scenario is not extensive enough to require a controller at the hospital. However, this event demonstrated the potential need for a controller to be present at the hospital in some situations. Therefore, all future medical drills, where hospital participation is required, will be evaluated by CECO to specifically determine if a controller may be needed at the hospital. When it is determined that a controller is needed at the hospital, one will be assigned to the hospital from time zero (T_0) until termination of the drill.

- 2) The ambulance crew that responded to the drill scene was apparently not the crew that had been selected to participate in the drill. Their dispatcher had sent a crew that had just come from a real call on a local road in the vicinity of the Station. The presence of a controller at the ambulance dispatch center may have prevented this.

CORRECTIVE ACTION STATUS: Specific ambulance crews are not normally selected for participation prior to drills. The Coal City Ambulance is staffed by all volunteer Emergency Medical Technicians (EMTs). Drills are scheduled with Coal City to ensure the appropriate staff is available for routine activities as well as the drill. Ambulance crews are assigned to the drill at the time that the call requesting assistance is received. Since the ambulance had already been dispatched for a real, life-threatening incident, they were directed by their dispatcher to respond to the Station call while they were returning to the firehouse following the recall. The dispatcher's actions were appropriate and were consistent with those actions expected if the Station emergency had been real. Commonwealth Edison does not believe that the presence of a controller at the dispatch center is necessary.

- 3) One instance of improper controller interaction with a player was noted. The ambulance driver asked a controller for the extent of the one victim's injuries as the victim was being placed in the ambulance. The controller noted that the driver was uninformed of the situation. However, the controller proceeded to provide this information to the player instead of more appropriately directing him to obtain that information from another player.

CORRECTIVE ACTION STATUS: The ambulance driver had appropriately asked the RPT present for the victim's condition. The RPT that was present had not actually attended the victim, but was riding in the ambulance as an escort for the controller, who was on a visitor badge. The controller decided to provide the information himself in the interest of time (at this time it was believed that the Loyola helicopter was waiting in the parking lot). The requested information, if not available from the attending RPT, would be available through assessment by the ambulance attendant during a real event. The controller informed the NRC Inspector present of his decision.

Since the player involved acted properly by making the appropriate inquiries, the controller's action is not deemed inappropriate by the licensee, but nonetheless, undesirable. The RPT in the ambulance should have been directed to obtain a turn-over from the attending RPT, regardless of time constraints. The controller was the regional representative of Radiological Management Consultants (RMC). In order to prevent recurrence in future drills, the matter has been discussed with the RMC representative.

- 4) After the victim had been placed in the ambulance, participants exhibited uncertainty regarding what area or personnel survey and decontamination activities were to be demonstrated. Since the on-scene controllers had proceeded to the Morris Hospital with the ambulance, the lead controller stayed behind to observe proper contamination control, monitoring and decontamination. No controller was available to control or evaluate this portion of the drill.

CORRECTIVE ACTION STATUS: The Station portion of the drill, at the first aid site, was intended to end after the victim(s) were loaded on the ambulance, as is CECO's standard procedure during a Medical Drill. No further actions were expected from the players and therefore, no controller was assigned to remain at this site. After

conversation with the NRC Inspector, the lead controller required the attending Shift Foreman and RPTs to demonstrate proper decontamination techniques. Commonwealth Edison will ensure that appropriate termination statements are provided in future scenarios to clarify when participation by any player(s) is intended to terminate.

ATTACHMENT B

SUMMARY OF EMERGENCY PREPAREDNESS INITIATIVES

Revision 7 to the Generating Stations Emergency Plan (GSEP) was implemented on March 1, 1991. Dresden Station has completed revisions to its Emergency Plan Implementing Procedures (EPIPs) to incorporate changes resulting from revision to the GSEP. The Dresden Station Annex has also been revised due to revision of the GSEP and to expand and clarify Emergency Action Levels (EALs). This Annex revision has received NRC review and the NRC has found that the effectiveness of the Emergency Plan was not diminished as a result of this revision.

Although no Emergency Exercises were conducted during the SALP 10 period, Dresden Station personnel participated in other Commonwealth Edison nuclear stations' Emergency Exercises and Pre-Exercises in 16 separate instances, as part of the Corporate Emergency Response Organization.

A second part-time EP Trainer was added to compliment the part-time EP trainer already assigned. The new trainer has a strong background in Health Physics and will be primarily coordinating EP-related Health Physics training; the other trainer will now primarily coordinate EP-related Operations training.

During the SALP 10 period, Morris Hospital in Morris, Illinois, was established as the primary support hospital for Dresden Station. Previously, Dresden had shared St. Joseph Hospital in Joliet, Illinois, with Braidwood Station. As a result of this, Dresden Station will now have offsite Medical Drills each year instead of every other year. St. Joseph Hospital remains as a backup medical facility for Dresden Station.

The Mazon EOF was upgraded during the SALP period to include an Executive Management Center (EMC). The EMC will serve as a conference area for the key managers and directors in the EOF. The EMC provides upgraded capabilities for viewing plant status information and for teleconferencing with State and Federal authorities. The NRC's office at the EOF was upgraded at the same time to provide more privacy and better communications capabilities. Commonwealth Edison Corporate personnel continue to work with Region III personnel to layout NRC workspace to their needs within the Mazon EOF.

Nuclear Services Emergency Preparedness (NSEP), was consolidated into a single location on the 12th floor of the Edison Building in Chicago. This has enabled more effective communications within the department and with the stations.

Construction of a new emergency response facility, the Corporate Emergency Operations Facility (CEOF), located in Downers Grove, was completed in 1990. The CEOF fulfills all of the functions of the old Corporate Command Center (CCC) that were available to Dresden Station. The CEOF has improved communication capabilities, increased area to allow for more complete staffing and is located in the same building as the majority of CECO's Nuclear Operations and Engineering personnel.

Dresden Station, with the assistance of Nuclear Services Emergency Preparedness personnel, voluntarily installed the Emergency Response Data System (ERDS) during the SALP 10 period and provided training to appropriate Station personnel. ERDS provides the NRC Response Centers at both Bethesda and Region III (via NRC computers at Bethesda) with real-time plant status information during an emergency event.

A major Human Factors upgrade of the C-Model program was accomplished during the SALP 10 period and will be declared operable at Dresden Station in September 1991. C-Model is an interactive offsite dose projection model used in the TSC and EOF.

Also during the SALP 10 period, the A-Model program was declared operable at Dresden Station. A-Model is an automated offsite dose projection model available in the Control Room.

Purchase of a new Environmental Emergency Sample Van, for use by environmental monitoring field teams, was authorized during the SALP 10 period. The new van will have a four-wheel rear axle that will provide improved safety and stability. The new van is scheduled to be put into service in 1993. The current van will come to the end of its ten year life span in 1993.

Commonwealth Edison Company has committed to fund \$400,000 toward a new Emergency Operations Center in Grundy County. This funding is contingent upon receipt of a letter of commitment from the County. Grundy County is within the EPZ for Dresden, LaSalle and Braidwood Stations.

On May 29, 1991, Grundy County evacuated their Courthouse as a result of a hazardous incident involving gasoline. The Courthouse is the location for the County Sheriff Department. The Sheriff Department dispatcher and the associated Prompt Notification System siren initiation equipment had to be abandoned, with operations relocated to the City of Morris Police Department. Commonwealth Edison obtained alternate phone numbers for the Sheriff Department and dispatched a van from Fulton Contracting to the Morris Police Department to standby in the event that activation of the Prompt Notification System would be necessary.

The Dresden Technical Support Center has undergone a materials upgrade, including new enhanced filing and storage capabilities, new status boards and a new color coded Minimum Manning board. New facility chairs have been purchased and will be added to the facility upon receipt.

The Station "GSEP Barn," the storage facility for the Offsite Environmental Sampling Van, has had electricity added to allow the addition of lighting and heating. This will enhance the van's constant state of readiness by keeping the van warm during adverse temperature conditions and provide illumination during non-daylight hours.

The Dresden Station Emergency Preparedness Department, in conjunction with all of Commonwealth Edison's Nuclear Operations area, has implemented its own Code of Ethics. The Code of Ethics reaffirms the Department's responsibilities in implementing the Emergency Plan and its commitment to continued improvement in emergency preparedness.

Dresden Station has implemented a new Emergency Preparedness Training Matrix during the SALP 10 period. The associated lesson plans now have Terminal Performance and Terminal Knowledge Objectives that are standardized with Commonwealth Edison's other Nuclear Power Plants.

On August 2, 1990, Dresden Unit Two experienced a spurious failure (open) of a Target Rock safety relief valve concurrent with suppression pool temperature greater than 110 ° F, resulting in the declaration of an Unusual Event. While activation of the TSC was not required, Dresden Station decided to partially staff the TSC for purposes of centralized control and recovery activities. Personnel involved gained valuable experience in TSC utilization that would be beneficial in the event of actual TSC activation.