

ACD

AUG 20 1992

Docket Nos. 50-237;
50-249; 50-254; 50-265;
50-295; 50-304; 50-373;
50-374; 50-454; 50-455;
50-456; 50-457

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Reed:

This refers to the inspection conducted by Mr. T. Ploski and others of this office on July 27-29, 1992. The inspection included a review of authorized activities for your corporate emergency preparedness department. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in violation of NRC requirements. However, as described in the enclosed inspection report, you identified the violation. Therefore, the violation will not be subject to enforcement action because your efforts in identifying and correcting the violation meet the criteria specified in Section VII.B of the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy, 10 CFR Part 2, Appendix C (1992)).

In addition, we have identified a significant issue concerning your ability to activate your Emergency Operation Facilities (EOF) in a timely manner. Your most recent augmentation drills indicate that minimum staffing would take at least two to three hours after your staff members were notified and complete staff augmentation would take as long as four hours. NRC regulations require timely augmentation of response capabilities. NUREG-0737, Supplement 1, specifies that facilities shall have as a goal emergency activation times for their EOF within the guidelines of Table 2 of the NUREG. The NRC's position is that an EOF should be staffed in about one hour after the decision to activate the facility is made. Supplement 1 to the NUREG also states that "reasonable exceptions" to this goal "should be justified and will be considered by NRC staff". The NRC is not aware of justification for staff augmentation times indicated by your recent drills. Therefore, your current emergency preparedness program does not appear to adequately meet the intent of the regulations pertaining to timeliness. We request a written response

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within 30 days describing your actions to address this inadequacy in your emergency preparedness program.

Your response should also include a description of how the results of your corrective actions will be assessed in accordance with 10 CFR 50.47(b)(14) which requires you to conduct exercises to evaluate major portions of your emergency response capabilities.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosed inspection report, and your response to this letter will be placed in the NRC Public Document Room.

The response directed by this letter is not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this inspection.

Sincerely,

ORIGINAL SIGNED BY CHARLES E. NORELIUS

Charles E. Norelius, Director
Division of Radiation Safety
and Safeguards

- Enclosure: Inspection Report
 Nos. 50-237/92022(DRSS); 50-249/92022(DRSS);
 50-254/92019(DRSS); 50-265/92019(DRSS);
 50-295/92020(DRSS); 50-304/92020(DRSS);
 50-373/92017(DRSS); 50-374/92017(DRSS);
 50-454/92014(DRSS); 50-455/92014(DRSS);
 50-456/92016(DRSS); 50-457/92016(DRSS)

See Attached Distribution:

RIII <i>CP for</i> Bloski/jp RIII 8/18/92 <i>CP</i> Pederson 08/18/92	RIII <i>CP for</i> Simons RIII 8/18/92 425 Norelius 8/20/92	RIII <i>CP for</i> Cox 8/18/92	yes RIII RCK Knop 8/18/92	RIII <i>HW</i> Farber 8/18/92	yes NRR <i>CP for</i> Brickson (m) 8/18/92	RIII <i>CP for</i> McClormick-Barger 8/18/92
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