



Commonwealth Edison  
1400 Opus Place  
Downers Grove, Illinois 60515

October 1, 1992

U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention Document Control

Subject: Commonwealth Edison Company Response to  
Referenced Inspection Report

Reference: C. Norelius letter to Cordell Reed dated August 20, 1992,  
transmitting NRC Inspection Report  
50-237/92022;50-249/92022  
-50-254/92019;50-265/92019  
-50-295/92020;50-304/92010  
-50-373/92017;50-374/92017  
50-454/93014;50-455/92014  
50-456/92016;50-457/92016

Enclosed is Commonwealth Edison's (CECo) response to additional information requested in the reference letter. The attachment provides information regarding the Inspection Follow-up Item on timely staffing of the Emergency Operation Facility (EOF) and notification drills for offsite Emergency Response Organization (ERO) personnel.

Much of this information was discussed in a September 17, 1992, meeting between Mr. D. L. Farrar, Ms. I. M. Johnson, et al (Commonwealth Edison) and Mr. C. Norelius, Ms. C. Pederson and Mr. J. McCormick-Barger (NRC Region III). During the course of this meeting, it was agreed that a written response to the referenced inspection report would be provided by October 1, 1992.

If there are any questions or comments regarding this response, please contact Denise Saccomando, Compliance Engineer, at (708) 515-7285.

Sincerely,

T. J. Kovach  
Nuclear Licensing Manager

Attachment

cc: A. B. Davis, NRC Region III  
C. Norelius, NRC Region III  
C. Pederson/J. McCormick-Barger, NRC Region III

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## ATTACHMENT

Commonwealth Edison has reviewed the concerns regarding timely staffing and activation of the four Emergency Operations Facilities (EOFs) and as a result of our evaluation, provides the following response:

Commonwealth Edison's approach to EOF augmentation is to staff the EOFs with qualified trained personnel within a reasonable timeframe. Personnel dispatched to the EOF will ultimately fulfill the duties outlined in NUREG-0737, Supplement 1 and assume some of the tasks that are being accomplished at the TSC. We believe that our philosophy of staffing the EOFs with corporate individuals and station personnel from unaffected stations is prudent in that (1) the affected station does not shoulder EOF staffing, (2) it applies independent expertise, and (3) available resources are maximized. Our philosophy is based on a proven division of responsibilities; station personnel responsible for onsite activities, and corporate/unaffected station personnel responsible for offsite activities. We believe that the onsite organization is staffed with the appropriate individuals to effectively provide the necessary functions and interface in the interim while EOF augmentation is taking place.

To ensure that future GSEP program enhancements comply with the intent of EOF staffing requirements, a review of NUREG 0737, Supplement 1 was conducted. In the NUREG, two types of requirements were established relative to staffing an EOF, a functional requirement and an augmentation time requirement.

The "Requirements" Section 8.4.1 essentially identified four functional requirements to be satisfied by an EOF without reference to when those functions must be satisfied. The four functions are:

- 1) Management of overall licensee response,
- 2) Coordination of the radiological and environmental assessment,
- 3) Development of recommendations for public protective actions, and
- 4) Coordination of emergency response activities with Federal, States and local agencies.

It should be noted that NUREG 0737, Supplement 1, Section 8.2.1 states: "The TSC will perform EOF functions for the Alert Emergency Class and for the Site Area Emergency Class and General Emergency Class until the EOF is functional."

Commonwealth Edison believes that the four functions outlined in NUREG 0737, Supplement 1, Section 8.4.1 are being met for an interim period at the Technical Support Center (TSC) during an emergency. Our philosophy of utilizing only site personnel at the TSC affords us the opportunity to call upon additional site personnel who would otherwise be directed to respond to the EOF. We believe that our current organization allows us to maintain these functions well beyond the one hour goal of staffing the EOF.

Staffing time, as referred to in NUREG 0737, Supplement 1, Section 8.4.1, Item 1, states that an EOF should be staffed using Table 2 as a goal. Table 2, under Major Functional Area: "Radiological Accident Assessment and Support of Operational Accident Assessment" identifies a need for a "senior manager" only, whose major task is that of EOF director. Since the senior manager could not perform all four duties specified in NUREG 0737, Supplement 1, Section 8.2.1, we provided for the staffing of additional personnel as promptly as is practical, and consistent with our approach that the TSC can for this interim period, perform EOF functions.

A critical time of transfer of functions 1 through 3 of NUREG 0737 could not be identified since the TSC performs these functions. With regards to functional requirement 4; coordination with Federal, State and local agencies (other than personnel normally assigned to the site) would begin, and continue for a period of time, through the many forms of communication media (phones, faxes and data links). The need for the EOF to be staffed with these positions would, therefore, be driven by the arrival of representatives of those agencies at the EOF. CECo EOF responders should typically arrive at the EOF prior to Federal and State representatives. County responders typically do not relocate to the EOF but remain at their "command facility." A CECo representative then acts as a liason between the EOF and the local agency in this facility.

CECo believes that our current program meets the NUREG philosophy, but recognizes that it can be enhanced by developing the use of our Corporate EOF (CEOF) as an interim facility with a one hour goal for minimum staffing. Minimum staffing as defined by CECo is capable of performing all 4 functional requirements as identified in Section 8.4.1 of NUREG 0737, Supplement 1.

Given the proximity of personnel to our corporate office in Downers Grove, we expect that we will be able to achieve minimum staffing of the CEOF in a timeframe that is earlier than could be practically achieved for the EOFs, and that will approximate the 60 minute goal. CECo will staff the CEOF at a "significant Alert," or higher, classification using a minimum staff. The CEOF will compliment the NRC monitoring mode and enhance communication with NRC Region III. During Site and General Emergencies, call-outs will be conducted for the CEOF and EOF concurrently. The CEOF will be capable of relieving the TSC by assuming specific EOF functions and command and control, if necessary. As demonstrated during our Quad Cities and LaSalle County Exercises, the CEOF is capable of acting as an interim facility, or if needed, as a functioning EOF. We believe that the use of the CEOF most effectively uses the resources available to assist the affected station in the most expeditious manner. It should be noted that individuals who will be assigned to the CEOF are experienced trained responders, who have demonstrated competency during past exercises at the EOF. The use of the CEOF as an interim facility will be included in a future GSEP plan revision which is tentatively scheduled for June 1993 submittal.

An evaluation of our past performances identified the following areas for potential improvement:

- 1) Need to revise the call tree and the GSEP phone directory to improve off-hour response,
- 2) Need to revise the augmentation drill procedure, and
- 3) Need to improve training on the augmentation process.

To ensure more timely staffing of EOF/CEOF personnel, Commonwealth Edison will enhance the augmentation drill procedure and the call tree process by completing the following actions.

CECo is currently conducting an Estimated Time of Arrival (ETA) Survey to evaluate response times. This survey will be completed by November 30, 1992. Based upon the results of the ETA Survey, minimum staffing positions in the GSEP phone directory will be prioritized, based on home locations, by December 31, 1992. To reduce the call-out time, Emergency Preparedness plans to increase the number of individuals with call-out responsibilities. Additional callers will also be added to accomplish simultaneous call-outs for the CEOF and EOF.

Emergency Preparedness will revise the augmentation drill procedure, CEPIP 2000-01, "Activation of the Corporate Emergency Response Organization," to include improved drill evaluation criteria. The interim revision to the augmentation drill procedure will provide evaluation criteria for meeting minimum staffing and revise the timeliness for conducting remedial drills. This revision will be completed by November 30, 1992. A final revision to CEPIP 2000-01, which will incorporate the ETA Survey results, will be completed by December 31, 1992.

To ensure that our callers and responders understand the results of past augmentation drills and the proposed changes, additional training will be provided to GSEP participants. Emergency Preparedness will issue a reading package to call-tree responders by October 15, 1992, addressing the problems encountered during the May 1992 Augmentation Drill. Suggestions will be made to responders to improve the overall response process. A reading package on the revised augmentation drill procedure, CEPIP 2000-01, will be provided to all responders with emphasis on realistic and timely performance. This reading package will be issued by December 31, 1992.