

May 19, 1993

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

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Mr. D. L. Farrar
Manager, Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III, Suite 500
1400 OPUS Place
Downers Grove, Illinois 60515

Dear Mr. Farrar:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PROPOSED GSEP REVISION INCORPORATING THE CORPORATE EOF AS AN INTERIM EOF (TAC NOS. M84864 THROUGH M84875)

By letter dated March 31, 1993, to A. Bert Davis, you submitted a revision to your Generating Stations Emergency Plan (GSEP) which: (1) changed the designated location for the Zion Station backup emergency operations facility (EOF) from the Corporate Command Center in Chicago to the Corporate Emergency Operations Facility (CEOF) located in Downers Grove, and (2) proposed the use of the CEOF as an interim EOF for all of your nuclear sites. The staff of the Emergency Preparedness Branch of NRR, in conjunction with the Region III DRSS staff, has reviewed your submittal and concluded that additional information is needed to determine whether the revision resolves the NRC concerns with the staffing of the CECO nearsite EOFs. The details of the request for additional information are enclosed. The staff's evaluation of your request to relocate the backup EOF for the Zion Station is ongoing and is not addressed in the enclosure.

The reporting and/or recordkeeping requirements contained in this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Should you have any questions or comments, please contact me at (301) 504-3017.

Sincerely,
Original signed by:

John B. Hickman, Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulation

9306020339 930519
PDR ADOCK 05000237
P PDR

Enclosure:
Request for Additional
Information

cc w/enclosure:
See next page 210047

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DFD

OFC NAME DATE	LA: PD III-2 CMOORE 5/19/93	PM: PD III-2 JHICKMAN 5/19/93	D: PD III-2 JDYER 5/19/93
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Mr. D. L. Farrar

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REVIEW OF GSEP REVISION 93-01

The following additional information is requested to determine whether Commonwealth Edison Company's (CECo) plans for staffing of their nearsite EOFs meet the intent of 10 CFR 50.47 in regards to timely augmentation of the emergency response capability.

1. Goal for Staffing of Nearsite EOF

Attachment A to the March 31, 1993, CECo letter, which transmitted Revision 93-01 to the GSEP, states, "Our approach involves staffing a corporate EOF within the one hour goal while a nearsite EOF is being staffed." In Revision 93-01 to the GSEP, the goal for staffing each of the nearsite EOFs is not stated.

State the goal for staffing the nearsite EOF for each of CECo's nuclear plant sites.

2. Results of Staffing Augmentation Analysis

Attachment A to the March 31, 1993, CECo letter indicates that efforts are being made to reduce the time for staffing of the nearsite EOFs, which include modeling of response times. Provide supporting documentation (time studies and results of actual augmentation drills) which demonstrates that CECo's goal for staffing the nearsite EOFs and the CEOF for each nuclear plant site is reasonably attainable in an actual event. In addition, provide a "to scale" map or diagram which indicates the location of each of CECo's nuclear plants, EOFs, and the CEOF.

3. CEOF Staffing Goal

Attachment A to the March 31, 1993, CECo letter states, "the CEOF can be expected to be staffed off hours within the one hour goal (55 to 75 minutes) after callout initiation." It is not clear how the time of "callout initiation" relates to the time the event is declared. The goal for staff augmentation as provided in Supplement 1 to NUREG-0737 is based upon the time the event is declared.

Provide justification for having a staffing goal for the CEOF based upon the time of "callout initiation" instead of the time an event is declared. Provide the relationship between the time of "callout initiation" and the time that an event is declared.

4. Minimum Staffing

GSEP Section 4.4, "Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities," states that the emergency response facility which is in command and control must perform the following essential activities:

Determine Emergency Action Level classification.
Determine Protective Action Recommendations (PARS).
Notify State, local, and Federal agencies as appropriate.
Maintain communications with their source of information.

The GSEP also specifies the minimum staffing level required for each of the emergency response facilities. It is not clear how the "minimum" staff will be able to perform all of the required functions. For example, the minimum staff for the EOF includes the Manager of Emergency Operations, Protective Measures Director, Technical Support Manager, Advisor Support Manager, Environs Director, or other Director or Communicator.

Provide additional information which demonstrates that the minimum staff will be able to perform the required functions for each of the emergency response facilities, including the CEOF. In particular, provide information regarding how the CEOF will communicate with Federal agencies, including the NRC.

5. Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the State and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECO proposal.

Provide documentation regarding coordination with the affected State and local governments on the time goal for the staffing of the CECO nearsite EOFs and the use of the CEOF as an interim EOF until the nearsite EOFs are staffed.

6. Significant Alert Classification

CECO has introduced a new emergency class called the Significant Alert, which is defined as "those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5."

The staff is concerned whether the complexity added to the emergency response due to the introduction of another emergency class, i.e., the Significant Alert, with the sole purpose of activating the CEOF at a lower class than the Site Area Emergency, is warranted. It is not clear whether State and local officials will be notified of a "Significant Alert" or "Alert" when the event meets the criteria for a "Significant Alert."

Provide additional justification for incorporating the "Significant Alert" classification which addresses these staff concerns.