

October 27, 1994

LICENSEE: Commonwealth Edison Company (ComEd)

FACILITIES: Byron Station, Braidwood Station, Dresden Station,
LaSalle County Station, Quad Cities Station, and Zion Station

SUBJECT: SUMMARY OF OCTOBER 19, 1994 MEETING

On October 19, 1994, a public meeting was held at 9 a.m. between the NRC and ComEd (the licensee) to discuss the licensee's request (March 31, 1993) for use of their corporate Emergency Operations Facility (EOF) as an interim EOF. The interim EOF would be at the corporate offices and function as the EOF until the EOF near the affected plant is operational. On September 19, 1994, the staff sent a request to the licensee for additional information (RAI) needed in order to complete its review of licensee's request. The meeting was convened to discuss the specific information that the staff expects in the formal RAI response. A list of attendees is enclosed (Enclosure 1). Enclosure 2 includes a copy of the licensee's meeting handout.

The licensee discussed its proposed response (Enclosure 2) to some of the questions posed by the staff and requested clarification on other questions.

A major area of staff concern was the licensee's ability to perform the interim EOF functions in a well disciplined and orderly manner with the staffing level proposed by the licensee. The licensee had identified a minimum staffing level and believed that because the interim EOF would be operating only a short time with less functional requirements than the near-site EOFs, no personnel augmentation would be necessary. Following the discussion of the viability of the unaugmented minimum staffing level, it was agreed that the licensee would consider the staffing requirements of a fully functional EOF, subtract the functions not required for the interim EOF (and the associated personnel requirements), and calculate the number of people that would be necessary to carry out those functions. That analysis will be included in the formal RAI response.

Original Signed By:

George F. Dick, Jr., Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

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

Enclosure:

1. List of Attendees
2. Presentation

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WASHINGTON, D.C. 20555-0001

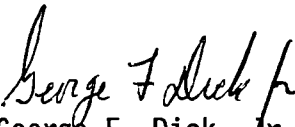
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cc w/encl: See next page

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October 19, 1994

Meeting with Commonwealth Edison Company

List of Attendees

Terry Blackmon	ComEd
Robert Capra	NRC
Larry Cohen	NRC
George Dick	NRC
Thomas Essig	NRC
Richard Emch	NRC
Leslie Holden	ComEd
Irene Johnson	ComEd
James Kreh	NRC
James McCormick-Barger	NRC
Charles Miller	NRC
James O'Brien	NRC

Enclosure 2

PRESENTATION TO THE NUCLEAR REGULATORY COMMISSION
ROCKVILLE, MARYLAND

OCTOBER 19, 1994

REQUEST FOR ADDITIONAL INFORMATION
PROPOSED USE OF CORPORATE EOF AS AN INTERIM EOF
(dated; September 19, 1994)

COMMONWEALTH EDISON'S PROPOSED USE OF CEOF
AS AN INTERIM EOF

- ComEd maintains that the use of the Corporate Emergency Operations Facility (CEOF), as an interim EOF, is an effective method for providing prompt off-site assistance to the stations.
- Many corrective actions and improvements have been made in response to lessons learned and to address various concerns.

For example:

- CEOF required to be activated at ALERT classification level;
 - Increased CEOF staff from initial six (6) positions to eight (8) positions (and now ComEd is proposing to increase to eleven (11) positions);
 - Implemented use of four (4) duty Augmentation Callers to call CEOF positions and Minimum Staff positions for EOF;
 - Revised Call-out Trees;
 - Prioritized call-out directory by drive times for CEOF and EOF Responders;
 - In the process of installing a computerized Automated Calling system;
 - Revised GSEP to require CEOF to take Command and Control.
- In keeping with our commitment to make the CEOF acceptable, we propose the addition of (3) positions to the CEOF to improve the communication capabilities.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

COMMUNICATIONS BETWEEN EMERGENCY RESPONSE FACILITIES

- ComEd will add three (3) communicator level positions to the CEOF staff.
 - When the CEOF is in Command and Control, these positions will perform the following functions:
 - **Governmental Communicator.** to assist Advisory Support Manager in communicating with off-site agencies and answer phones in the Advisory Support room;
 - **Environmental Communicator.** to perform functions of the HPN Communicator (if an open line is requested by the NRC) and monitor field team communications as directed by Health Physics/Environmental Specialist;
 - **Technical Communicator.** to perform the duties of the ENS Communicator and monitor plant status as directed by Technical Specialist.
 - These positions will be part of the required Emergency Response Organization (ERO) for the CEOF.
 - The addition of the three (3) communicator positions will enhance the ability of the CEOF to communicate to other Emergency Response Facilities and Off-site Agencies.
- By requiring the CEOF to take Command and Control, communication between the CEOF and other Emergency Response Facilities will be enhanced because the CEOF will be in a direct line of authority.
- A Reading Package will be issued to all CEOF and EOF Responders, addressing the need for effective communications between and within Emergency Response Facilities. A copy will be issued to Station Emergency Preparedness Coordinators for distribution at their Stations.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

LACK OF SUPPORT STAFF TO PERFORM EMERGENCY RESPONSE FUNCTIONS

- Functions identified by NUREG-0737 (Sup. 1), Section 8.4.1, which are to be performed by an EOF are:
 - Management of overall licensee emergency response
 - Coordination of radiological and environmental assessment
 - Development of recommendations for public protective actions
 - Coordination of emergency response activities with Federal, state and local agencies.
- ComEd proposes to staff the following eleven (11) positions in the CEOF:
 - Manager of Emergency Operation (CEO)
 - Technical Support Manager (CEO)
 - Advisory Support Manager (CEO)
 - Protective Measures Director (CEO)
 - Technical Specialist
 - HP/Environmental Specialists (2)
 - Emergency Planner (CEO)
 - *Environmental Communications*
 - *Governmental Communicator*
 - *Technical Communicator*
- Staff in CEOF is capable of performing the required functions of an EOF until a near-site EOF can assume Command and Control.
- The use of the CEOF as an Interim EOF most effectively utilizes the resources available to assist the station in the most expeditious manner;
 - Off-hours it would take approximately 1 to 1½ hours to staff the CEOF subsequent to an ALERT or higher classification.
 - During normal work hours the CEOF could be staffed almost immediately because of resources available within the Downers Grove offices.
- Status Boards are available for use in the CEOF:
 - Status boards are not critical in CEOF because there is a relatively small group of people who can communicate face-to-face.
 - Emergency Planner in the CEOF is responsible for maintaining the status board in the EMC.
- Public Affairs Interfacing is performed by ComEd's Public Affairs Department until the near-site Emergency News Center/JPIC is available.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

LACK OF SUPPORT STAFF TO PERFORM EMERGENCY RESPONSE FUNCTIONS

(continued)

- Field Team (Off-Site Survey Team) Control
 - Environs Group does not need Field Team control to:
 - Perform Dose Assessments,
 - Formulate PARs,
 - Monitor for Potential Event Classification Level upgrades.
 - CEOF can take control of the Field Teams.
 - Radio capabilities are provided at the CEOF (for BEOF applications).
 - Would NOT remove burden from the station:
 - TSC personnel remain in their dedicated positions.
 - CEOF Environs Group:
 - Staffed with more experienced health physics personnel;
 - Performs in an interactive monitoring mode with Field Teams and TSC;
 - Discusses Field Team strategy with the TSC Environs Director.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

TRANSFER OF COMMAND AND CONTROL

- Requirement for CEOF to assume Command and Control at a Site Emergency (or higher classification) included in GSEP Rev. 7D (June 1994).
 - Previous to GSEP Rev. 7D it was discretionary for the CEOF to assume Command and Control.
- CEOF and EOF procedures have been revised to reflect that CEOF is required to take Command and Control.
- Station Procedures have been revised to address the transfer of Command and Control to the CEOF.
- Training was conducted via issuance of a Reading Package --
 - Reading Package 94-01, "Corporate EOF: Activation, Operation, & Command and Control Policy" (dated 4/28/94) was issued 5/2/94,
 - Distributed to all Off-site Emergency Responders,
 - Distributed to Station Managers for dissemination at their stations.
- The required transfer of Command and Control to the CEOF was demonstrated at the Zion, Dresden and Quad Cities Exercises.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

UNTIMELY DETERMINATION OF EMERGENCY CLASSIFICATIONS
AND PROTECTIVE ACTION RECOMMENDATIONS

- Per Request for Additional Information:

"Due to a combination of the lack of support staff and communication problems, emergency classifications and protective action recommendations from the corporate EOF were observed to be untimely."

- Reviewed NRC Inspection reports for 1993/1994 for specific examples:
 - Review found no Weaknesses, Follow Up Items or negative comments noted for the CEOF with regards to Emergency Action Level (EAL) classifications or Protective Action Recommendations (PARs).

<ADDITIONAL NRC CLARIFICATION REQUESTED>

- The addition of Technical and Environmental Communicator positions should assist in precluding problems in this area.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

CEOF EQUIPMENT

- Equipment in the CEOF is essentially identical to the EOFs with the exception of the ENS and HPN lines.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

REAL TIME ACTIVATION OF EMERGENCY RESPONSE FACILITIES

- ComEd will perform a one time demonstration of the real-time activation of the CEOF and EOF:
 - Braidwood Exercise on March 22, 1995.
 - Individuals will be pre-identified to minimize impact on daily operations.
 - Response will be in real-time to actual facilities.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

AUGMENTATION DRILLS

- Ten (10) Augmentation Drills have been conducted since July, 1992 indicate. Results indicate:
 - CEOF can be staffed within 1 to 1½ hours;
 - Minimum Staff to near-site EOFs within 1½ to 3½ hours;
 - Some difficulties in obtaining full EOF staffing.
- ComEd is continuing with our efforts to improve our augmentation response time.
- Examples of changes made to enhance our augmentation process:
 - Implemented new Call-Tree process with four (4) Augmentation Callers.
 - Call-Trees prioritized to call EOF Minimum Staff positions first.
 - All CEOF/EOF responders prioritized by shortest drive time from home.
 - Various Reading Packages have been issued to responders addressing changes and identifying problems encountered during Augmentation Drills.
- ComEd is installing a computerized automated call-out system to:
 - Reduce the time for the call-out process,
 - Improve our ability to reach full staffing levels in the EOF and JPIC.
 - Cost of approximately \$100,000.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

IMPACT PLACED ON-SITE EMERGENCY RESPONSE
FACILITIES BY PROPOSED PLAN

- Per Request for Additional Information:

"In response to Inspection Report 50-237/92022, you provided information regarding the staffing plans and the use of the corporate EOF. This response did not address the negative aspects of your plan, such as not assuming the ENS and hpn functions from the technical support center (TSC), as well as not assuming the control of the field teams from the TSC.

Provide information regarding your assessment of the additional burden on the on-site emergency response facilities bear due to your plan for staffing the near-site EOF with corporate and unaffected station personnel and using an interim EOF."

- Overall concerns expressed address committed positions in the TSC, which would not be re-deployed after Command and Control is transferred from the TSC. Therefore actual impact on the TSC of not transferring these functions is negligible.

<ADDITIONAL NRC CLARIFICATION REQUESTED>

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

IMPACT OF REVISING EMERGENCY PLAN TO STAFF THE NEAR-SITE EOF
WITHIN ABOUT 1 HOUR

- Impact of Staffing a near-site EOF with Station personnel.
 - An additional burden is placed on the station.
 - Station would have to provide personnel to the EOF in addition to the on-site emergency response facilities (Control Room, TSC, and Operational Support Center).
 - Limited number of personnel at Station who can meet EP responder qualifications:
 - Would be forced to:
 - Use less qualified personnel, or
 - Eliminate some positions in the TSC and EOF.
 - Staffing both TSC and EOF with affected Station's health physics personnel, would impact station's ability to respond to a radiological event:
 - Sufficient station Health physics personnel are available to fill health physics/environmental TSC positions.
 - Station's could NOT staff both the TSC and EOF health physics positions without relying on corporate and unaffected station health physics.
 - It would be difficult for station personnel to meet the one hour staffing goal for the EOF:
 - Station's are already finding it difficult to meet the TSC one hour staffing goal,
 - Station personnel generally live further from the EOF than they do from the Stations.
 - Substantial changes to the GSEP and bases of ComEd's emergency response philosophy would be needed.
 - This alternative would not be effective because:
 - Burden on the station would be increased,
 - Difficult to meet the one hour EOF staffing goal.
 - Significant cost in program revisions and training,
 - GSEP effectiveness reduced, and
 - No additional safety benefit.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

IMPACT OF REVISING EMERGENCY PLAN TO STAFF THE NEAR-SITE EOF
WITHIN ABOUT 1 HOUR

(continued)

- Impact of Initial Minimum Staffing to the EOF provided by Station personnel.
 - An additional burden is placed on the station.
 - Station would have to initially provide personnel to the EOF in addition to the on-site emergency response facilities.
 - Limited number of personnel at Station who can meet EP responder qualifications:
 - Would be forced to use less qualified personnel.
 - Staffing both TSC and EOF with affected Station's health physics personnel, would impact station's ability to respond to a radiological event:
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 - Burden on the station would be increased,
 - Difficult to meet the one hour EOF staffing goal.
 - Significant cost in program revisions and training,
 - GSEP effectiveness reduced, and
 - No additional safety benefit.
- Impact of building new EOFs closer to population centers and staff with Station personnel.
 - Extremely costly.
 - Same impact as others except may be able to meet one hour staffing goal.

PRESENTATION ON COMMONWEALTH EDISON'S
PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF
OCTOBER 19, 1994

RELOCATION OF CORPORATE ENGINEERING STAFF

- ComEd does heavily rely on the Engineering Department to provide responders to the EOF.
- None of the individuals on the call-out list for the CEOF/EOF were transferred to a station as a result of the recent engineering reassignment in late August (1994).
- In the future, personnel from the Nuclear Fuel Services (NFS) department will be added as CEOF/EOF responders:
 - Subsequent to their relocation to the Downers Grove offices.
 - Scheduled for early 1995.
 - NFS personnel are desirable responders because of their core analysis backgrounds.
 - The movement NFS out to Downers Grove will be an enhancement to using the CEOF.

PRESENTATION ON COMMONWEALTH EDISON'S
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