



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

Docket File

50-237

June 2, 1995

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

Dear Mr. Farrar:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PROPOSED USE OF
THE CORPORATE EOF AS AN INTERIM EOF (TAC NOS. M84864, M84865,
M84866, M84867, M84868, M84869, M84870, M84871, M84872, M84873,
M84874, AND M84875)

On May 11, 1995, a conference telephone call was held between the NRC staff and members of the Commonwealth Edison Company (ComEd) staff during which we discussed the status of ComEd's proposal to staff and activate, within an hour following an emergency, an interim emergency operations facility (EOF) at the corporate offices until the near-site EOF is staffed and activated. As part of the discussions, the NRC staff informed ComEd of its remaining open issues and requested additional information. This letter formally requests ComEd to provide the requested additional information.

In NRC Inspection Report 50-237/92022, dated August 20, 1992, the NRC staff identified a concern that the ComEd emergency plan does not provide for timely augmentation of its emergency response organization to relieve the control room and technical support center of off-site emergency response functions. In response to this concern, ComEd proposed (in its September 1992 emergency plan revision) to activate the corporate EOF, within an hour following an emergency, as an interim EOF until the near-site EOF could be staffed. In the period since the submittal, NRC has held numerous meetings and conference calls with ComEd personnel. The NRC staff has observed the implementation of the Corporate EOF as an interim EOF during a number of emergency exercises and drills and has repeatedly identified concerns with ComEd's implementation of its proposed plan.

Earlier concerns focused on ComEd's inability to effectively transfer command and control between emergency response facilities and to adequately perform the functions of an EOF with the limited staff assigned to the Corporate EOF. As stated in the May 11, 1995, conference call, the staff observed the activation, staffing, and operation of the interim EOF during a Braidwood and a Zion exercise in April of this year. The staff's concerns regarding staffing and operation were resolved based upon their observations. The remaining concern is ComEd's inability to staff the Corporate EOF within one hour following an emergency declaration at one of its nuclear plants.

9506220076 950602
PDR ADOCK 05000237
F PDR

NRC FILE CENTER COPY

AA3

DF01

Although there has been considerable emphasis on ComEd's capability to activate the Corporate EOF within about 1 hour, please note that even though ComEd has proposed to eliminate the need for prompt staffing of the near-site EOFs, the NRC has not approved this proposed change. A review of recent augmentation drills indicates that it has taken as long as 3½ hours to staff one of the near-site EOFs. Consequently, the need for timely staffing of the near-site EOFs remains. Until the staff approves the requested change to the interim EOF, it is expected that ComEd will use its best efforts to activate the near-site EOFs within the one hour goal.

Although we believe that a number of the concerns identified earlier have been resolved, progress toward resolution of the time for staffing, which was an initial staff concern in 1992, has been very slow. With this now as the remaining item, we request a response within 30 days of receipt of this letter so that we may complete our evaluation and promptly make our recommendation to the Commission. A summary of our outstanding concerns and request for additional information is enclosed. If there are questions regarding this request, please contact Mr. George Dick at (301) 415-3019.

This requirement affects nine or fewer respondents and, therefore, is not subject to Office of Management and Budget review under P.L. 96-511.

Sincerely,

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

Enclosure: Request for Additional
Information

cc w/encl: see next page

DISTRIBUTION:

Docket File	PUBLIC	OGC
PDIII-2 r/f	RCapra	GDick
CMoore (6)	JStang	RAssa
EAdensam (EGA1)	ACRS (4)	JCreed, RIII
LMiller, RIII	TEssig	
JO'Brien	LCohen	
RAssa	CMiller	
BClayton, RIII	WRackley	
CShiraki	PHiland, RIII	

DOCUMENT NAME:BYRON\BY84864.RAI

To receive a copy of this document, indicate in the box: "C" = Copy without enclosures "E" = Copy with enclosures
"N" = No copy

*See previous concurrence

OFFICE	LA:PDIII-2	PM:PDIII-2	TERB	D:PDIII-2	E
NAME	CMOORE	GDICK:avl	CMILLER	RCAPRA	
DATE	05/31/95*	06/ /95	06/01/95*	06/02/95	

OFFICIAL RECORD COPY

D. L. Farrar

cc:

Mr. William P. Poirier
Westinghouse Electric Corporation
Energy Systems Business Unit
Post Office Box 355, Bay 236 West
Pittsburgh, Pennsylvania 15230

Joseph Gallo
Gallo & Ross
1250 Eye St., N.W., Suite 302
Washington, DC 20005

Regional Administrator
U.S. NRC, Region III
801 Warrenville Road
Lisle, Illinois 60532-4351

Ms. Bridget Little Rorem
Appleseed Coordinator
117 North Linden Street
Essex, Illinois 60935

Chairman
Rock Island County Board
of Supervisors
1504 3rd Avenue North
Rock Island County Office Bldg.
Rock Island, Illinois 61201

U.S. Nuclear Regulatory Commission
Braidwood Resident Inspectors Office
Rural Route #1, Box 79
Braceville, Illinois 60407

Mr. Ron Stephens, Director
Illinois Emergency Services
and Disaster Agency
110 East Adams Street
Springfield, Illinois 62706

Howard A. Learner
Environmental Law and Policy
Center of the Midwest
203 North LaSalle Street
Suite 1390
Chicago, Illinois 60601

EIS Review Coordinator
U.S. Environmental Protection Agency
77 W. Jackson Blvd.
Chicago, Illinois 60604-3590

Chairman
Will County Board of Supervisors
Will County Board Courthouse
Joliet, Illinois 60434

Commonwealth Edison Company

U.S. Nuclear Regulatory Commission
Byron Resident Inspectors Office
4448 North German Church Road
Byron, Illinois 61010-9750

Ms. Lorraine Creek
Rt. 1, Box 182
Manteno, Illinois 60950

Mrs. Phillip B. Johnson
1907 Stratford Lane
Rockford, Illinois 61107

Attorney General
500 South Second Street
Springfield, Illinois 62701

U.S. Nuclear Regulatory Commission
Zion Resident Inspectors Office
105 Shiloh Blvd.
Zion, Illinois 60099

George L. Edgar
Newman & Holtzinger, P.C.
1615 L Street, N.W.
Washington, DC 20036

Commonwealth Edison Company
Byron Station Manager
4450 North German Church Road
Byron, Illinois 61010

Illinois Dept. of Nuclear Safety
Office of Nuclear Facility Safety
1035 Outer Park Drive
Springfield, Illinois 62704

Commonwealth Edison Company
Braidwood Station Manager
Rt. 1, Box 84
Braceville, Illinois 60407

Chairman, Ogle County Board
Post Office Box 357
Oregon, Illinois 61061

Mayor of Zion
Zion, Illinois 60099

Dr. Cecil Lue-Hing
Director of Research and Development
Metropolitan Sanitary District
of Greater Chicago
100 East Erie Street
Chicago, Illinois 60611

Chairman
LaSalle County Board of Supervisors
LaSalle County Courthouse
Ottawa, Illinois 61350

Mr. J. Heffley
Station Manager, Unit 3
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

U.S. Nuclear Regulatory Commission
Resident Inspectors Office
Dresden Station
6500 North Dresden Road
Morris, Illinois 60450-9766

Chairman
Grundy County Board
Administration Building
1320 Union Street
Morris, Illinois 60450

Phillip P. Steptoe, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Assistant Attorney General
100 West Randolph Street
Suite 12
Chicago, Illinois 60601

U.S. Nuclear Regulatory Commission
Resident Inspectors Office LaSalle Station
2605 N. 21st Road
Marseilles, Illinois 61341-9756

Michael I. Miller, Esquire
Sidley and Austin
One First National Plaza
Chicago, Illinois 60603

Mr. D. Bax
Station Manager, Unit 2
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Robert Cushing
Chief, Public Utilities Division
Illinois Attorney General's Office
100 West Randolph Street
Chicago, Illinois 60601

LaSalle Station Manager
LaSalle County Station
Rural Route 1
P. O. Box 220
Marseilles, Illinois 61341

Chairman
Illinois Commerce Commission
Leland Building
527 East Capitol Avenue
Springfield, Illinois 62706

Mr. Stephen E. Shelton
Vice President
Iowa-Illinois Gas and
Electric Company
P. O. Box 4350
Davenport, Iowa 52808

Mr. L. William Pearce
Station Manager
Quad Cities Nuclear Power Station
22710 206th Avenue North
Cordova, Illinois 61242

U.S. Nuclear Regulatory Commission
Quad Cities Resident Inspectors Office
22712 206th Avenue North
Cordova, Illinois 61242

Station Manager
Zion Nuclear Power Station
101 Shiloh Blvd.
Zion, Illinois 60099-2797

Mr. Thomas P. Joyce
Site Vice President
Dresden Nuclear Power Station
6500 North Dresden Road
Morris, Illinois 60450-9765

Kenneth Graesser, Site Vice President
Byron Station
Commonwealth Edison Station
4450 N. German Church Road
Byron, Illinois 61010

REQUEST FOR ADDITIONAL INFORMATION

COMMONWEALTH EDISON COMPANY

TO SUPPORT REVIEW OF

GSEP REVISION 93-01

1. During the meeting held in September 1994, the NRC requested ComEd to propose how to resolve the issue of timely activation of the interim EOF. In its letter of November 22, 1994, ComEd committed to demonstrate a "real-time" activation of its emergency plan. This activation would permit the NRC to observe the augmentation of the emergency organization in a realistic fashion which would test as much of the augmentation system as possible without placing undue burden on the licensee. ComEd proposed the demonstration as part of the Braidwood exercise in March 1995 in order to minimize the burden on its staff. During the Braidwood exercise (postponed until April) a new callout system which had been installed to enhance ComEd's augmentation process, failed. A controller had to intervene to inform the exercise participants of the failure and to direct them to use the backup callout systems. As a result of this failure, ComEd was unable to demonstrate its ability to augment the emergency response organization within about 1 hour.

Two issues were raised as a result of the staff's observation of the Braidwood exercise. They are:

- (a) ComEd has established a Nuclear Duty Officer (NDO) position who activates the callout system. The NDO carries a pager and a cellular phone. The NDO receives a page from the affected plant when an Alert is declared. ComEd indicated that the page may take as long as 15 minutes to reach the NDO. Upon receiving the page from the affected plant, the NDO remotely activates the callout system via a pager and then receives confirmation of the callout system operation by way of a third page. This system of activation is complicated and could result in delaying augmentation of ComEd's emergency response.
- (b) During the Braidwood exercise the NDO was not aware that the callout system had failed. ComEd explained that the callout system (located in the licensee's computer data center in Joilet, IL., which is remote from the NDO) should send the NDO a signal via his pager upon failure of the system. One signal is sent if the system fails to initiate. A second signal is sent if the system fails to complete its callout. The staff is concerned with the time delay in the notification of the NDO of possible system failures. ComEd has stated that a backup system is to be installed which should increase the reliability of the callout system. Notwithstanding this improvement, the staff is still concerned with the lack of positive indication to the NDO that the system is working properly during an emergency callout.

ENCLOSURE

The above concerns have the potential to impact ComEd's capability to augment the Corporate EOF within about one hour from the time of declaration of an Alert and with a high degree of reliability. Please explain how ComEd proposes to resolve this concern.

2. Following the Braidwood exercise, the NRC reviewed augmentation drill results and the procedure for performing it. Review of the drill results indicated that it takes about 1½ hours for ComEd to staff the Corporate EOF. In addition, the following concerns regarding the procedure for conducting off-hour augmentation drills were identified:

- (a) The procedure indicates an acceptance value of ≤75 minutes.
- (b) The same procedure indicates that "zero time" is when the NDO receives the notification call. This can raise the actual "acceptable" activation time to 90 minutes.

In both of the procedure citations above, the activation time would be greater than the goal of one hour from time of declaration of an Alert as stated in Generating Stations' Emergency Plan.

Please indicate how the above are consistent with the staffing goal stated in ComEd's Generating Stations' Emergency Plan.