



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

February 8, 1996

Mr. D. L. Farrar, Manager
Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III
1400 Opus Place, Suite 500
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SUBJECT: USE OF THE CORPORATE EMERGENCY OPERATIONS FACILITY AS AN INTERIM
EMERGENCY OPERATIONS FACILITY - COMMONWEALTH EDISON COMPANY (TAC
NOS. M84864, M84865, M84866, M84867, M84868, M84869, M84870, M84871,
M84872, M84873, M84874 AND M84875)

Dear Mr. Farrar:

By letters dated March 31 and August 5, 1993, Commonwealth Edison Company (ComEd) submitted proposed changes to its Generating Stations Emergency Plan (GSEP) that included the use of the corporate emergency operations facility (EOF) as an interim EOF until the affected station's near-site EOF is staffed and operational. Additional and clarifying information was provided by ComEd by its letters of September 23, 1993, November 15, 1994, November 22, 1994, December 16, 1994, June 7, 1995, July 21, 1995 and October 2, 1995. The ComEd emergency response strategy involves staffing of the EOFs with personnel from the corporate office and unaffected stations and staffing the onsite emergency facilities (i.e., control room, technical support center and operational support center) with personnel from the affected station. This strategy is intended to optimize the services of ComEd senior managers in the formulation of key onsite and offsite decisions and allows the affected stations to focus on the onsite response.

Utilizing the above emergency response strategy, ComEd has estimated that it currently takes from 1½ to 4 hours to staff its near-site EOFs, depending on the site involved and the availability of emergency response personnel. With the proposed change to use the corporate EOF as an interim EOF, it can be staffed within 1 hour and assume emergency management responsibility until the near-site EOF is staffed and operational.

The standards that emergency response plans for nuclear power reactors must meet are delineated in 10 CFR 50.47 and in Appendix E to 10 CFR Part 50. NRC guidance regarding acceptable methods for meeting the emergency planning requirements is given in NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements (Requirements for Emergency Response Capability)." Supplement 1 to NUREG-0737 specifies that (1) the EOF must be located between 10 and 20 miles from the site, and (2) Commission approval is required if the EOF is to be located beyond 20 miles from the site. ComEd's corporate EOF is located from 32 to about 120 miles from an affected site.

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The NRC staff has reviewed the proposed change to the GSEP as well as observed demonstrations of how it would be implemented. The corporate EOF was successfully used as an interim EOF during the Braidwood Station emergency exercise on April 11, 1995, and the Zion Station full-participation exercise on April 26, 1995. In addition, the NRC staff observed an offhours unannounced callout drill which demonstrated ComEd's ability to staff the interim EOF within 1 hour. On November 21, 1995, the staff recommended that the Commission approve ComEd's plan for interim use of its corporate EOF as a reasonable exception to the Commission's guidance on EOFs. On January 31, 1996, the Commission accepted the staff's recommendation.

As result of the staff's review and the Commission's acceptance of the staff's recommendation, we find ComEd's request to use the corporate EOF as an interim EOF until the near-site EOF is staffed and operational to be acceptable.

Sincerely,

/s/

Robert A. Capra, Director
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

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