

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Reports No. 50-237/89014(DRSS); No. 50-249/89013(DRSS); No. 50-254/89011(DRSS);
No. 50-265/89011(DRSS); No. 50-295/89014(DRSS); No. 50-304/89014(DRSS)
No. 50-373/89011(DRSS); No. 50-374/89011(DRSS); No. 50-454/89012(DRSS)
No. 50-455/89014(DRSS); No. 50-456/89013(DRSS); No. 50-457/89013(DRSS)

Docket Nos. 50-237; 50-249; 50-254;
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NPF-37; NPF-66; NPF-72;
NPF-77

Licensee: Commonwealth Edison Company
Post Office Box 767
Chicago, IL 60690

Facility Name: Commonwealth Edison Corporate Emergency Preparedness Department

Inspection At: Commonwealth Edison Corporate Office
Chicago, Illinois

Mazon Emergency Operations Facility
Mazon, Illinois

Inspection Conducted: April 24-25, 1989

Inspectors: *T. Ploski*
T. Ploski

5/9/89
Date

M. Smith
M. Smith

5/9/89
Date

Approved By: *W. Snell*
W. Snell, Chief
Emergency Preparedness
and Effluents Section

5/10/89
Date

Inspection Summary

Inspection on April 24-25, 1989 (Reports No. 50-237/89014(DRSS);
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No. 50-456/89013(DRSS); No. 50-457/89013(DRSS))

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Areas Inspected: Special, announced inspection of the corporate Emergency Preparedness (EP) Department's activities in support of the EP programs at the licensee's Dresden, Quad Cities, Zion, LaSalle, Byron, and Braidwood Nuclear Generating Stations. The inspection involved two NRC inspectors, and was based on aspects of the following Inspection Procedures: 82205, 82206, 82207, 82209, 82701, and 92701.

Results: No violations of NRC requirements or deficiencies were identified. The level of corporate support for the six stations' EP programs has not diminished due to the recent major changes in the licensee's Nuclear Operations Organization. The EP Department has retained a good number of experienced staff and is increasing its direct interface with State and local support agencies. A number of good practices have evolved and are being refined to improve the interface between corporate staff and the stations' EP staffs. The result of the quality of the coordination between corporate and the stations' EP staffs has been the improvement of the stations' EP programs in response to NRC and self-identified concerns.

DETAILS

1. Persons Contacted

- *I. Johnson, Emergency Preparedness Director
- J. Golden, Emergency Preparedness Supervisor
- T. Blackmon, Emergency Preparedness Supervisor
- T. Gilman, Emergency Preparedness Supervisor
- R. Carson, Emergency Preparedness Staff
- G. O'Neill, Emergency Preparedness Staff
- L. DiPonzio, Emergency Preparedness Staff
- R. Hajak, Emergency Preparedness Staff
- M. LePage, Emergency Preparedness Staff
- M. Vonk, Emergency Preparedness Staff
- L. Duchek, A-Model Lead Engineer
- A. Malkewicz, Environmental Monitoring Staff Engineer
- D. Adam, Emergency Preparedness Assessment Administrator

* Attended the April 25, 1989, exit interview.

2. Licensee Action on Previously Identified Items (IP 92701)

(Closed) Open Item No. 265/88019-02: During the 1989 exercise at the Quad Cities Station, Emergency Operations Facility (EOF) staff failed to involve Technical Support Center (TSC) staff in an important discussion with State officials on the rationale behind the initial offsite Protective Action Recommendation (PAR) that had just been developed by TSC staff.

Records review indicated that a required reading package was distributed in February 1989 to all persons who could perform Protective Measures Director or Coordinator duties in the offsite Emergency Response Organization (ERO) for any of the licensee's nuclear stations. The package contained a well-detailed description of the concerns associated with this Open Item and included additional guidance on required turnover briefing topics for TSC and EOF staffs involved in protective action decisionmaking, to better ensure that newly arrived EOF staff are not only aware of any current PAR but are also well aware of the bases for the recommendation. This item is closed.

(Closed) Open Item No. 265/88019-04: During the 1988 exercise at the Quad Cities Station, EOF protective measures and engineering staffs did not adequately interface regarding a degradation of plant systems which adversely affected the composition of the simulated radiological release. Instead, protective measures staff falsely assumed that the Standby Gas Treatment System's very high filtering efficiency had not been degraded by earlier scenario events.

The aforementioned required reading package also adequately described this exercise performance problem and provided additional guidance on the need for protective measures staff to remain fully aware of plant systems availability and operability factors that can affect release composition or duration. This item is closed.

3. Organization and Management Control (IP 82701)

a. Division of Responsibilities and Staffing

The corporate emergency planning staff was reorganized in early 1989 as part of the Introspect Program which is causing numerous significant changes in the Nuclear Operations Organization at the six nuclear stations and the corporate office.

The reorganized Emergency Preparedness (EP) Department's Director reports to the Senior Vice President for Nuclear Operations through the General Manager of Nuclear Services. This reporting chain has fewer steps than did the previous reporting chain. The Director has retained direct responsibility for certain EP training program development and scheduling activities, while utilizing three supervisors for the following areas: operations and onsite programs; environmental monitoring and special projects; and, governmental affairs and offsite Emergency Response Facilities (ERFs). The Director's EP background includes lengthy membership in the offsite ERO plus frequent interfacing with regulatory agencies on EP matters as a nuclear licensing administrator. The three supervisors all have lengthy supervisory experience in various areas of EP.

The Operations and Onsite Programs Supervisor has retained many responsibilities, including: lead role in the development and coordination of exercise scenarios and Emergency Action Levels (EALs); development of some periodic EP drill scenarios; primary interface with the nuclear stations' GSEP Coordinators, who are station employees but functionally report to the corporate EP Director; maintenance of the "EP TRAK" system for tracking corrective actions on NRC, INPO, and self-identified items assigned to corporate or the stations' EP staffs; generating periodic performance reports on the stations' EP programs; development and coordination of emergency plan revisions; and maintenance of EOF and Corporate EOF (CEOF) Emergency Plan Implementing Procedures (EIPs).

The Environmental Monitoring and Special Projects Supervisor's responsibilities include: maintenance of offsite dose projection hardcopy and computerized procedures (A-Model and C-Model); maintenance of procedures used by environmental monitoring teams; maintenance of the Offsite Dose Calculation Manual (ODCM) for routine releases; and interface with the vendor providing

Reports, Quality Assurance (QA) audits, INPO evaluation reports, and self-assessment reports to the six stations' GSEP Coordinators.

The group has begun issuing "Guidance Recommendations" and other informative notices on a wide range of topics of generic interest. The topics and/or content of these recommendations were originated by a GSEP Coordinator or by corporate staff. Recent topics included: acceptance criteria for offsite relocation centers reserved for station evacuees; an improved form for documenting the evaluation of licensee records associated with an emergency plan activation; and concerns on the adequacy of recently procured portable generators used by field teams. These informative notices have been addressed to Station Managers, GSEP Coordinators, and selected corporate managers.

Exercise scenario development has been a major task of the Operations and Onsite Programs group for some years. Members of this group lead the scenario development teams which include licensed and non-licensed station representatives. The group's representatives coordinate the teams' efforts, function as the primary interface with Federal and State agencies, and ensure that exercise controllers are properly trained. The Operations and Onsite Programs group, the six stations GSEP Coordinators, and some GSEP Training Instructors have evolved into a cadre of exercise controllers and evaluators which is supplemented by station personnel on a scenario development team and other personnel. Following each exercise, the group compiles controller and participant records and issues well-detailed internal evaluation reports which are distributed to the stations and corporate staff.

The group has also led the licensee's efforts to upgrade the six nuclear stations' Emergency Action Levels (EALs). Thus far, five stations' upgraded EALs have received NRC approval. The upgrades include a standardized format and wording, where possible. A lengthy "EAL Philosophy Document" has been included with each station's EAL upgrade, which has been submitted for NRC review as a proposed emergency plan revision. The philosophy documents defined the technical bases for each EAL, including references to regulatory guidance, Technical Specifications, and assumptions utilized in establishing EAL setpoints.

The GSEP Coordinators have utilized their stations' Nuclear Tracking Systems (NTS) to list action items affecting their area of responsibility. Beginning in 1989, corporate staff at the Mazon EOF have utilized an "EP TRAK" computerized system to list such information, strengths and weaknesses noted in SALP evaluations of the stations' EP programs, and action items assigned to corporate staff. The information system has the capability to sort current and closed items by station, topic, identifying organization, or by

the individual assigned to resolve the item. Action items were assigned priorities reflecting the degrees of concern of the external or internal organizations that identified the items. Corporate staff have begun to issue periodic EP TRAK reports to the stations and to re-institute periodic station visits to review the GSEP Coordinators' progress on current action items.

During 1988 the group began issuing periodic performance evaluations of each station's program. Overall performance was rated in four categories, with ratings based on the results of NRC, QA, INPO, and internal evaluations of a number of program activities. These evaluations were distributed to all Station Managers, the GSEP Coordinators, and to selected corporate managers as a means of reporting and, to some extent, comparatively evaluating the six stations' EP programs on a frequent basis.

Based on the above findings, this portion of the licensee's program was acceptable.

c. Self-Assessments of the EP Program

Licensee staff have conducted self-assessments of the stations' EP programs since the summer of 1987. These assessments have been beneficial to most stations' EP programs and were in addition to the efforts of the Quality Assurance (QA) Department and INPO assistance visits. By late 1988, self-assessments had been completed at each of the licensee's nuclear stations by a team consisting of one or more corporate self-assessment group representatives assisted by one or more GSEP Coordinators. Self-assessment group representatives also observed some of the licensee's 1988 exercises.

Procedural guidance for the self-assessment teams was developed from a number of sources, including: results of NRC inspections of the EP programs at the licensee's stations; NRC inspection guidance for EP Implementation Appraisals; INPO document Nos. 85-001 and 85-014; and results from QA audits and previous self-assessments. Self-Assessment reports were issued and distributed to appropriate personnel at the six nuclear stations and the corporate office. Categories of findings ranged from improvement recommendations to items requiring corrective action and followup.

Prior to 1989, five-day self-assessments had been conducted at all or some of the stations for the following functional areas: EP, chemistry/radwaste; and rad protection/ALARA. A proposed 1989 schedule of self-assessments in these three areas had been developed, with the next EP assessment planned for May 1989.

The Introspect Program has resulted in staffing changes to the enlarged Performance Assessment Department, which has assessment

meteorological monitoring and forecasting services. Current special projects included: relocation of the CEOF to the west suburban future location of the bulk of the corporate Nuclear Operation Organization, and studying alternative locations for the Byron Station's Joint Public Information Center (JPIC).

The Governmental Affairs and Facilities Supervisor's responsibilities include: interfacing with Federal, State, and local governmental agencies; maintenance of the licensee's dedicated communications systems; maintenance of the offsite ERFs to some respects; and vendor interface regarding upgrade and maintenance of the prompt notification (siren) systems in each nuclear station's Emergency Planning Zones (EPZs).

The 1989 reorganization has resulted in a decrease in the total number of corporate EP supervisory positions; however, the total number of experienced corporate EP staff is essentially unchanged. The Director indicated that the number of licensee employees in the government affairs group has begun to increase as reliance on contractors decreases.

Prior to the 1989 reorganization, the six nuclear stations' GSEP Coordinators had gradually achieved uniform reporting chains to their Station Managers. Since implementation of the Introspect Program, several variations in reporting chains have occurred. It was premature to determine whether the GSEP Coordinators' reporting chains to their Station Managers would return to uniformity. There were no indications that the number of GSEP Coordinators would change from one or two full-time coordinators per Station, with a varying amount of support available from a part-time GSEP Training Instructor.

Based on the above findings, this portion of the licensee's program was acceptable.

b. Functions of the Operations and Onsite Programs Group

The Operations and Onsite Programs group, currently based at the Mazon EOF, has been the corporate EP Department's principal interface with the stations' GSEP Coordinators and GSEP Training Instructors. For several years, representatives from this group have conducted counterpart meetings with the stations' EP staffs. Review of documentation of recent quarterly meetings indicated that these sessions were worthwhile opportunities to share information on a wide variety of external and internal EP issues. Meeting minutes have been distributed to attendees, Station Managers, the corporate self-assessment group, and corporate EP supervisors. The Operations and Onsite Programs group has also been responsible for distributing copies of relevant NRC Inspection

administrators for EP and six other functional areas. The EP Assessment Administrator indicated that the schedule may be revised, and was uncertain whether the 1989 schedule would be expanded to include an assessment of the corporate EP Department. He indicated that consideration was being given to include EP experts from outside the licensee's organization in future EP assessments along with licensee staff having related areas of expertise. Continued assessment team presence at exercises and EP drills was also being planned so that future assessments would become more "performance based."

Based on the above findings, this portion of the licensee's program was acceptable.

4. Emergency Plan and Implementing Procedures (IP 82701)

The Operations and Onsite Programs group was responsible for revising the generic Generating Stations Emergency Plan (GSEP) and for coordinating the document's onsite and offsite review prior to implementation. This staff performed the same functions for the generic EOF and CEOF implementing procedures.

The Operations and Onsite Programs Supervisor provided an overview of the proposed changes to the next revision to the GSEP. This revision was being referred to as Revision 0 due to the amount of restructuring of its contents. The document will reflect the normal organization's changes caused by the Introspect Program and the reorganization of each station's Rad Chem Department into Radiation Protection and Chemistry Departments. Revision 0 would also include additional lessons learned from the 1987 Federal Field Exercise, subsequent exercises, and self-assessments. Completion of the onsite and offsite reviews of Revision 0 was expected by October 1989.

The licensee has coordinated with Illinois, Wisconsin, Iowa, and Illinois Power Company officials a revision to the Nuclear Accident Reporting System (NARS) form that is utilized when initially informing State officials of an emergency declaration. The revised NARS form should be ready for use in mid-1989. The form has been revised to address several NRC and self-identified concerns, including: listing the relevant Emergency Action Level (which had been deleted in the previous revision); allowing greater flexibility in identifying three or more affected downwind sectors; and provisions for providing additional types of information that are not pre-formatted on the form. The licensee indicated that the State of Illinois' "IESDA Hazardous Materials Questionnaire," utilized in reporting Transportation Accidents, was also being revised and would be incorporated in the GSEP.

Based on the above findings, this portion of the licensee's program was acceptable.

5. Emergency Response Facilities (ERFs) (IP 82701)

The inspectors toured the Corporate Command Center (CCC) located in the licensee's downtown Chicago offices. The facility was in an adequate state of operational readiness. This facility would be activated in accordance with the approved Emergency Plan. The CCC Director and his staff may assume overall command and control of the licensee's emergency response efforts while other corporate staff and predesignated staff from unaffected nuclear stations are enroute to the affected station's EOF. The CCC, which is being redesignated as the Corporate EOF (CEOF), is also the Backup EOF for the Zion Nuclear Generating Station.

The licensee was planning to relocate the bulk of the Nuclear Operations Organization to an unfinalized location of DuPage County, Illinois during 1989. The Nuclear Services Organization, which included the EP Department, was not included in the current relocation plan. However, corporate EP staff were involved in planning the relocation of the CEOF to the Nuclear Operations Organization's future suburban location. The licensee was well aware of the needs to maintain an operable CEOF during the relocation process and to formally inform appropriate Regional and Headquarters NRC staffs of the planned relocation of this Backup EOF for the Zion Station. The licensee was informed that relocation of the CEOF to the western suburbs could lead to a reevaluation of the desirability of dispatching Region III representatives to an activated CEOF in addition to the TSC and nearsite EOF.

The Byron Station's EOF and JPIC are presently located in the same structure in Dixon, Illinois. Corporate staff were considering moving only the JPIC to an undetermined location in Rockford, Illinois as an alternative to modernizing and enlarging the present JPIC. The licensee agreed to keep Region III staff informed of the relocation decision.

Based on the above findings, this portion of the licensee's program was acceptable.

6. Offsite ERO Staffing Levels (IP 82205)

Corporate EP staff have been responsible for issuing quarterly updates of the GSEP Telephone Directory, which included prioritized listings of corporate office and station personnel who have been trained to fill well-defined positions at any of the licensee's EOFs and/or the CEOF. The current directory listed good numbers of persons for each EOF or CEOF position. Staffing levels were more than adequate to ensure 24-hour staffing capability at any EOF plus the CEOF.

Based on the above findings, this portion of the licensee's program was acceptable.

7. Emergency Preparedness Training (IP 82206)

Two full-time staff members were directly responsible to the EP Director for the annual EP training program for corporate and station personnel having positions in the licensee's offsite Emergency Response Organization (ERO). A review of the organization of the training program was conducted. A comprehensive matrix had been developed, lesson plans reflecting the training matrix were completed, and binders for training modules have been developed. Each binder contained objectives, student reading materials, student handouts, lesson plans and applicable tests.

Training program requirements were proceduralized. All EOF and CEOF staff are required to qualify annually for their ERO positions. Initial training consisted of classroom training, an exam, and drill participation. Requalification training can be accomplished by a test out. Training was offered quarterly for various positions and was offered several times during the quarter. If a participant had difficulty in meeting this schedule, the trainer adapted the schedule to one on one training as necessary. Training records were well tracked on a computerized system that included training attendance and documents issued to each individual. The status of all current corporate EP documents was also tracked using this system. The corporate telephone directory was also updated using this computer system. Information regarding personnel changes at the stations and the corporate office, which could impact offsite ERO staffing, was being effectively tracked.

The six nuclear stations have had approved onsite ERO training programs for years. The licensee has nearly completed development of a standardized onsite ERO training program. This task was undertaken as an INPO commitment in the mid-1980s. Standardized training materials were initially developed by the licensee's Production Training Center (PTC). The training modules and matrix of requirements have been adopted and modified to varying degrees by the stations' Training Departments for several years. Modifications included the incorporation of station-specific EIPs and other details. The corporate EP Department assumed responsibility for program development efforts from the PTC in the Spring of 1988. The current standardization attempt is the development of another matrix and lesson plans which represent the "minimum standards" for each station's annual EP training program. The standardized training program was in the final stages of development and testing at the Dresden Station. The corporate EP Department has committed to the Quality Assurance Department to complete program development by June 30, 1989. Standardized program materials would then be made available to the other stations' Training Departments so that the existing training programs can be compared to the new "minimum standards" and upgraded as needed.

The licensee was developing an expanded, standardized training program for its Environs Directors, who perform offsite dose assessment and field

survey team direction tasks in a TSC, EOF, or CEOF. The 1988 training program, which was attended by about 50 persons, included a seminar on dispersion modeling and meteorological principles which was envisioned as the core of the 1989 program. A review of materials planned for use in the May 1989 training program indicated that it would address: onsite meteorological measurements; affects of topography on local meteorology; the Gaussian model; plume rise; building wake effects; source term determination; field team instrumentation; field team briefing and communication techniques; and hands-on training with computer terminals utilized for offsite dose calculation.

During 1988, the licensee contracted the development of an indepth EP certification program for the stations' and corporate office's EP staffs. One half of the desired number of training modules have been completed. The in-house training program is being conducted during 1989. The licensee has informed other Region III licensees of its willingness to make the program available so that development of additional modules can be funded. Development of an indepth training program for EP specialists is unprecedented in Region III.

Records review indicated that four meetings were conducted with offsite support groups for all six nuclear stations. Meetings were coordinated through the Governmental Affairs staff and included participation by Plant Managers, GSEP Coordinators, corporate Public Information Officers, and Governmental Affairs personnel. Meeting agendas included: EAL reviews, self-assessment and QA Audit findings related to offsite agency interface, EP program highlights, and plant performance highlights and future plans. Attendance by offsite support groups was adequate.

Enhanced cross-training was conducted with the State of Wisconsin at the Zion Station in 1989. The Wisconsin Director of Emergency Government and Wisconsin Public Information Officer presented material regarding Wisconsin's response to an incident at a licensee facility, and the State's response in an ingestion pathway exercise. Licensee personnel were also educated on matters unique to the Zion Station, such as the Illinois Beach State Park. Slides of State Emergency Operations Centers were used to better educate station staff on offsite response efforts.

During 1988, media briefings were offered to members of newspapers and radio and TV media for each of the nuclear stations. Attendance at these sessions was poor. The licensee has begun efforts to improve the attendance of local media. An improved agenda was presented at the Zion Station in April 1989. Invitations were sent by the Division Directors. Agenda items included: participation by Public Information Officers from Illinois, Wisconsin, and the licensee; and tours of the Control Room simulator and the Zion Station. The simulator tour included a demonstration using drill data on the simulator. The onsite tour included the TSC and the Turbine Deck. The response of local media was greatly improved. Press packets were provided which included excellent discussions

on the use of nuclear energy to generate electricity, fundamentals of radiation, and acronym definitions. Members of the press were encouraged to keep these packets for future reference.

Based on the above findings, this portion of the licensee's program was acceptable.

8. Offsite Dose Assessment and Meteorological Monitoring Programs (IP 82207)

The status of A-Model installation was discussed with the EP Department's member assigned to the project. The A-Model is a computerized offsite dose calculation methodology in a station's Control Room which will automatically perform such calculations should containment radiation level, monitored release rate, or wind speed measurement exceed computerized set points corresponding to a station's EALs and/or Technical Specification limits. Model output may also include the relevant EAL and offsite Protective Action Recommendation (PAR) guidance. The A-Model is operational at the Byron, Braidwood, and LaSalle Stations. The schedule dates for the A-Model becoming operational at the Zion, Quad Cities, and Dresden Stations were December 1989, March 1990, and May 1990, respectively. Records review indicated that milestone dates were being met to achieve these deadlines.

The model installation process included test plans for onsite verification and validation. Procedure EP-TECH-4 adequately described how an authorized individual could initiate a change to the model's administrative program due to an approved change to an EAL. Records indicated that changes had been properly made when the Unusual Event EALs for high wind speeds had been deleted from the Byron, Braidwood, and LaSalle Stations' revised EALs.

There was no apparent administrative deadline for completing A-Model changes that would be necessitated by changes to a station's EALs. The EP Department's representative to the A-Model project was adequately aware of the status of the Department's EAL upgrade project which has affected all six stations' EALs. The Byron and Braidwood Stations' upgraded EALs received NRC approval in December 1988. These upgraded EALs included the addition of an Unusual Event EAL for containment radiation level.

The C-Model is the hardcopy and computerized set of procedures utilized by TSC, EOF, and CEOF staffs to generate offsite dose projections. Another member of the licensee's corporate EP staff has been upgrading these procedures. Upgrades in progress included: standardization of units of measure among the various procedures; elimination of hand calculations between steps of some computerized procedures; human factors refinements to inputs and to displays; and improved documentation of the methodologies' technical bases and assumptions.

At present, hardcopy and computerized procedures ED-5,6,10 and 26 have been upgraded, including verification and validation of the software using test cases. These procedures were selected based on their frequency of use during exercises. The EP staff representative indicated that the remaining ED-series hardcopy procedures would be updated by late 1989, at which time the computer systems group would begin the associated programming. The entire C-Model upgrade project was estimated to be completed in late 1990.

The licensee has utilized a contractor for a number of years to maintain the onsite meteorological monitoring programs at the six nuclear stations. The contractor has the capability to remotely interrogate the monitoring systems to identify outages and suspect data. The licensee indicated that the remote interrogations are done several times each day. Unscheduled equipment checks can be initiated without prior licensee approval in addition to the weekly site visits and bimonthly calibrations. A sample of monthly and semi-annual monitoring program reports were reviewed. These early 1989 reports confirmed statements in the Emergency Plan regarding system maintenance and calibration provisions.

Based on the above findings, this portion of the licensee's program was acceptable; however, the following item should be considered for improvement:

- o The licensee should establish a deadline for completing a change to an operational A-Model following approval of a revision to a station's EALs.

9. Public Information Brochures (IP 82209)

A review of randomly selected records indicated that brochures were distributed in 1987 and 1988 within each nuclear station's 10-mile Emergency Planning Zone (EPZ). Brochures were distributed according to customer billing and actual address listings. In some cases, customers supplied electricity by the Illinois Power Company resided within the 10-mile EPZ of one of the licensee's nuclear stations. Records indicated that brochures were distributed to such customers through mailing lists developed in cooperation with the Illinois Power Company. Bulk distribution of brochures to businesses and public use areas were completed, and later verified by licensee personnel in the Division Offices.

The overall format and content of the brochures has been standardized where possible, with the exceptions of maps and other information specific to each station's EPZ. A revision to the Braidwood Station's brochure was completed in 1987 to satisfy a commitment to the Atomic Safety and Licensing Board. The revision did not involve site-specific

information. The licensee coordinated with Illinois, Wisconsin, and Iowa officials so that the revised wording appeared in the 1988 brochures for all six stations.

Based on the above findings, this portion of the licensee's program was acceptable.

10. Exit Interview

The inspectors met with the EP Department Director at the end of the inspection and with the EP Supervisors during the inspection to present the preliminary inspection findings. The licensee indicated that none of the items discussed were proprietary.

The licensee was informed that the level of corporate support for the stations' EP programs had not diminished due to the recent changes in the Nuclear Operations Organization. The EP Department has retained the bulk of its experienced personnel and is increasing its direct involvement with State and local support organizations. A number of good practices have evolved and are being refined to improve the interface between corporate staff and the stations' EP staffs. The self-assessment program has also had a very beneficial impact on some stations' EP programs in addition to the efforts of QA and corporate EP staffs. The result of the overall quality of the coordination between corporate staff and the stations' EP staffs has been the improvement of the stations' EP programs in response to NRC and self-identified concerns.