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Secretary of the Commission
 U.S. Nuclear Regulatory Commission
 Washington, DC 20555

Attention: Docketing and Service Branch

Dear Sir:



Commonwealth Edison Company hereby submits comments in respect to NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants." Commonwealth Edison supplies electricity to over eight million people in northern Illinois. The Company holds NRC operating licenses for seven nuclear reactors at Morris, Zion and Cordova, Illinois and construction permits for six additional reactors being built near Byron, Braidwood and Seneca, Illinois.

Of particular concern is the apparent inflexibility of the "criteria" proposed. In our view the implementation of these rules without proper consideration of the knowledge, experience and expertise of the State, Local and Operator participants may jeopardize the fundamental objective of improved emergency preparedness. This is particularly true of the current treatment of personnel response requirements (Criterion B.5), notification requirements (Criterion E.6) and protective response requirements (Criterion J). These issues as well as the remainder of our comments are discussed in the attachment to this letter.

Commonwealth Edison Company is committed to the development and implementation of a comprehensive, workable emergency preparedness program. Forced compliance with objective criteria for which adequate technical basis either do not exist or have not been clearly documented will undermine the effective implementation of such a program.

Commonwealth Edison appreciates the opportunity to comment on this document.

Respectfully,

L. O. DelGuzo

FOR/ D. L. Peoples
 Director of
 Nuclear Licensing

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ACKNOWLEDGED by card. 5/20/80...mdv.

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Comments on NUREG-0654/FEMA - REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants.

1. Section I (Page 25)

The statement concerning a plan of "hundreds of pages" yet "understandable by a layman in a single reading" should be deleted. This is impossible to achieve if one is to still have a plan that addresses all of the applicable criteria contained in NUREG 0654.

2. Criteria A.1.e (Page 27) and F.1.a (Page 40)

These criteria coupled with the requirement for minimum staffing from Table B-1 infers that there would be a full-time "dedicated communications person" on-shift for manning of communications links. It is Commonwealth Edison's position that the requirement for 24 hour per day manning of communications links is satisfied by on-shift persons while performing their normally assigned duties, and therefore, a "dedicated communications person" on-shift is not necessary.

3. Criterion A.3 (Page 28)

The intent of this criterion is not clear. Commonwealth Edison suggests that it should apply to State and local plans. Criterion B.10 does apply to the operator (utility) and is addressed in comment Item 5.

4. Criterion B.5 (Page 30)

As stated in Item 2 above, Commonwealth Edison's position is that a "dedicated communications person" on-shift is not necessary. The requirement for a 24 hour per day manning of communications links is satisfied by on-shift persons while performing their normally assigned duties. The requirement for additional manning, as reflected in Table B-1 is both unrealistic and not necessary. The 30 minute requirement should be 60 minutes. While there may be some augmentation within 30 minutes, it is not necessary that all designated persons be on site within 30 minutes. Additionally, to require the station's staff to live within 30 minutes is clearly an undue burden when no useful purpose is served. It is not clear, from the guidance provided, at what level of emergency the augmentation would be required. In any case, it is not necessary that 26 additional persons be on site within 30 minutes. The utilization of persons performing their normally assigned on-shift duties to satisfy the requirements for 24 hour per day manning of communications links and the time frame of 60 minutes for providing additional manning (augmentation) have both been approved by the NRC as acceptable actions for our Zion Nuclear Station in their Confirmatory Order, dated February 29, 1980.

5. Criterion B.10 (Page 33)

It is Commonwealth Edison's position that such written agreements should not be included in the plan since they must be re-newed periodically. The agreements, however, may be referenced and summarized in the plan. The actual letters of agreement are filed and maintained by Commonwealth Edison.

Commonwealth Edison

6. Criterion C.2 (Page 34)

The requirement for the operator (utility) to dispatch a representative to principal off-site governmental emergency operations centers should be deleted. Representatives from governmental emergency operations centers will be reporting to the operators (utility) Emergency Operations Facility from which the utility will manage its response to the emergency. Commonwealth Edison will, however, dispatch a representative upon specific request.

7. Criterion D.1 (Page 36)

This criterion implies word for word compliance with NUREG 0610. Some flexibility is essential for effective emergency response capability. For additional comments, see Commonwealth Edison's Comments on NUREG 0610, in a letter to the Secretary of the Commission, dated November 29, 1979.

8. Criterion D.2 (Page 36)

With regard to NUREG 0610, this criterion is redundant with D.1. With regard to FSAR postulated accidents, they involve a specific sequence of events which may already be generically covered by NUREG 0610 initiating conditions. In addition, some FSAR postulated accidents would not warrant any emergency classification.

9. Criterion E.6 (Page 39)

It is Commonwealth Edison's position that the imposition of a qualitative generic 15 minute requirement for notification of the populace within the 10 mile EPZ is unjustified. No justification has been given for the time limit, and the practical and technical issues associated with such a requirement have not been fully aired. Notification and instructions of the public have historically, and properly, been the statutory responsibility of State and local governments. Although the need for timely notification is acknowledged, the complex interactions of plant design, site characteristics, and existing notification capability have not been adequately assessed by FEMA or NRC. Until such time the 15 minute warning requirement issue has been resolved by the NRC and FEMA, the reference to the operator's (utility) responsibility to ensure such means exists, should be deleted. For additional comments see Commonwealth Edison's comments on NRC Proposed Rules on Emergency Planning, 44 Fed. Reg. 75167 (December 19, 1979), in letter to Secretary of the Commission, dated February 15, 1980.

In addition, there are requirements in Appendix 3 of NUREG 0654 to perform an annual survey of residents and to incorporate into the plan, provisions for corrective measures to provide assurance that notification coverage is maintained. This item should be deleted or made a separate criterion on its own.

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10. Criterion E.7 (Page 39)

It is Commonwealth Edison's position that the requirements of this criterion are applicable to the State and local plans, not to the operators (utility) plan.

11. Criterion H.2 (Page 44)

It is Commonwealth Edison's position that the comment, "In most cases, the principal operators nearsite Emergency Operations Facility should be within one mile of the reactor", should be deleted. There is nothing critical about this distance and no reason why it could not be 10 miles. The operator (utility) should have the absolute freedom to select a location at a distance greater than one mile to take advantage of better facilities, better access, or other considerations.

12. Criterion H.6.b. (Page 45)

Offsite (realtime) ratemeters should not be necessary if TLD dosimetry is in-place. The reference to the NRC Branch Technical Position (BTP) is not specific; the reference should be deleted or the appropriate portion of the BTP should be added as an appendix to NUREG 0654.

13. Criterion H.7 (Page 45)

The intent of this criterion is unclear since it seems to duplicate criterion H.6.

14. Criterion H.8 (Page 46)

Implementation of a meteorological program as described in Appendix 2 would provide for more data than could possibly be used in any realistic emergency response situation. The criteria were obviously prepared by professional meteorologists to satisfy what they would like to see in the way of data acquisition and transmission. They were not prepared by professional emergency planners to satisfy their needs for making emergency response decisions.

Specifically with regard to Criterion 3.C(3) of Appendix 2, a determination of the accuracy of models used in estimating atmospheric transport and diffusion to distances out to 50 miles from a site may cost hundreds of thousands (or millions) of dollars, and in fact, may be impossible depending on the location of the site itself.

15. Criterion H.9 (Page 46)

It is Commonwealth Edison's position that the requirements, as specified, for the Onsite Operational Support Center are extreme. The area is for assembly of operational support personnel which could be relocated based upon need or existing conditions. Other than for capacity and communications, the requirements should be deleted.

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16. Criterion H.10 (Page 46)

Commonwealth Edison provides for inspection, inventory, and operational checks of equipment in accordance with normal station procedures. Equipment is normally operationally checked before each use. The value of checking an instrument after use is questionable. Calibration is performed in accordance with Station procedures. Calibration may be performed more or less frequent than recommended by the supplier of the equipment (usually more frequent).

17. Criterion I.4 (Page 48)

Establishing a relationship between effluent monitor readings and onsite and offsite contamination levels would be a nearly impossible task. One wonders whether the writer of this criterion really meant what he or she wrote.

18. Criterion I.5 (Page 48)

In those situations where the nearsite Emergency Operations Facility is not the focal point for environmental assessment, then the requirement to transmit meteorological data to the EOF should not exist or at least the requirement should be rephrased to provide for meteorological data being transmitted to an environmental assessment center.

19. Criterion I.7 (Page 48)

It may be impossible to meet this criterion under the conditions stated, i.e., "interference from the presence of noble gas and background shall not decrease the stated minimum detectable activity."

20. Criterion J.1.d (Page 50)

The reference to an "owner controlled area" is confusing. Commonwealth Edison assumes that the writer of this criterion was referring to the site "protected area."

21. Criterion J.4 (Page 51)

The criterion infers that non-essential personnel would be evacuated in the event of a Site or General Emergency. It is Commonwealth Edison's position that the decision to evacuate or relocate personnel will be based upon existing circumstances at the time regardless of the level of the emergency. Evacuation could be the prudent thing to do during an Alert, and yet may not be necessary during a specific Site Emergency.

22. Criterion J.8 (Page 52)

Commonwealth Edison has submitted preliminary Evacuation Time Study Reports for Dresden, Quad Cities, Zion, and LaSalle County Stations to the NRC Office of Nuclear Reactor Regulation. However, it is our position that evacuation of the populace, methods and routes used, and consequently the time estimates for evacuation should come from State and local governments. Information, once determined by State and local governments, could be referenced in the operators (utility) plan.

Commonwealth Edison

23. Criteria J.10.a, J.10.b, J.10.c, and J.10.m (Pages 52 and 55)

It is Commonwealth Edison's position that the requirements of sub-paragraphs a, b and c are the responsibility of State and local governments. The required information, once determined by State and local governments, could be reflected in the operators (utility) plan. With regard to sub-paragraph m, the requirement to ". . . include expected local protection afforded in residential units for direct and inhalation exposure, as well as evacuation time estimates" is the responsibility of State and local government and need not be reflected in the operators (utility) plan.

In addition, Table J-1 should identify sectors in terms of direction (N, NNE, NE, etc). This method of sector identification is more readily understood and remembered.

24. Criterion J.10.h (Page 54)

There is no basis for having relocation centers 5 to 10 miles beyond the boundaries of the plume exposure emergency planning zone. Relocation centers should be determined on a case-by-case basis.

25. Criteria N.1.b (Page 62) and N.4 (Page 65)

It is Commonwealth Edison's position that State and Federal authorities shall be invited to participate in scheduled exercise and thereby be in a position to observe and evaluate the exercise and participate in the critique. The requirements to start an exercise between 6 P.M. and midnight and another between midnight and 6 A.M. once every six years should be deleted. This would only drive up the costs associated with the exercise for Utilities, State and local governments. It is reasonable to conduct drills in those time frames; however, exercises should not be conducted at these times.

26. Criteria N.2.d, N.2.e (Page 63)

The last phrase in N.2.e(1), "and direct radiation measurements in the environment" should be added to N.2.d; then, N.2.d should be re-titled Environmental Monitoring Drills.

The word elevated in N.2.e(2) should be defined. It would appear that academic radiation exposure is being sanctioned by the NRC.

27. Criterion O.1.b (Page 66)

The use of the word shall in this criterion is a bit strong. It seems reasonable that "training programs shall be established for emergency response organizations." Participation in these programs should be encouraged but should remain voluntary.