

MAR 31 1977

DISTRIBUTION:

Docket  
NRC PDR  
L. PDR  
ORB#1Rdg.  
VStello  
KGoller  
TCarter  
Attorney, OELD  
OISE (3)  
D. Davis  
ASchwencer  
G. Zech  
DSilver  
PO'Connor  
SSheppard  
RDiggs  
BGrimes

DEisenhut  
TAbernathy  
JBuchanan  
ACRS (16)

Docket Nos.: 50-10, 50-237, 50-242, 50-254  
50-265, 50-295 and 50-304

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Vice President  
P. O. Box 767  
Chicago, Illinois 60670

Dear Mr. Lee:

The results of recent inspection activities by representatives of the NRC Office of Inspection and Enforcement Region III, have indicated to us a need to revise certain implementing procedures of your generic Commonwealth Edison Generating Stations Emergency Plan (GSEP) which is intended to apply to all of your operating nuclear power stations. These inspection activities included the review of the implementing procedures of GSEP and discussions with the Environmental Director at you Zion Station.

The enclosure to this letter describes the areas in which we believe the implementing procedures should be revised to conform to the federal guidance cited.

We therefore request that you review the implementing procedures of GSEP in light of the enclosure, develop appropriate revisions and submit a revised set of GSEP implementing procedures for our review within sixty days of receipt of this letter. Your submittal should include a proposed schedule for implementing these revised procedures on each of your operating nuclear power facilities.

Sincerely,

Karl R. Goller, Assistant Director  
for Operating Reactors  
Division of Operating Reactors

Enclosure:  
Discussion of GSEP Implementing  
Procedures

cc: w/enclosures: See next page

OFFICE	ORB#1:DOR	ORB#2:DOR	ORB#3:DOR	ORB#4:DOR	ORB#5:DOR	ORB#6:DOR
SURNAME	GZech:nn	D. Silver	P. O'Connor	D. Davis	ASchwencer	KGoller
DATE	3/23/77	3/30/77	3/30/77	3/30/77	3/29/77	3/31/77

8009100832

F

POOR ORIGINAL

cc: Robert J. Vollen, Esquire  
109 North Dearborn Street  
Chicago, Illinois 60602

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

Waukegan Public Library  
128 North County Street  
Waukegan, Illinois 60085

Mr. John W. Rowe  
Isham, Lincoln & Beale  
Counselors at Law  
One First National Plaza, 42nd Floor  
Chicago, Illinois 60603

DISCUSSION OF GSEP IMPLEMENTING PROCEDURES  
(COMMONWEALTH EDISON GENERATING STATIONS - EMERGENCY PLAN)

The Commonwealth Edison Generating Stations Emergency Plan (GSEP) was transmitted to NRC with a letter dated February 18, 1975, and was accepted by NRC as meeting the requirements of 10 CFR Part 50 Appendix E by letter, Ziemann to Abel dated May 23, 1975.

GSEP includes in Table 4.2-1 Guidelines for Categorization of Radiological Incidents for an Alert Stage and an Emergency Stage, Offsite, respectively of 0.5 Rem and 5 Rem Whole Body dose and 1.5 Rem and 15 Rem Thyroid dose. These values were deemed acceptable although they are somewhat lower than the Protective Action Guidelines (PAGs) published by the U.S. Environmental Protection Agency in January 1975 in the "Emergency Response Protective Action Guides-Airborne Releases from Fixed Nuclear Facilities." PAGs are defined in terms of ranges or projected dose. The document states, "Projected dose is the dose that would be received by individuals in the population group from the contaminating event if no protective action were taken." The document further states, "The greater sensitivity of children and fetuses indicates that these initial groups will in most circumstances dictate the decision on when protective action is initiated." In a discussion with the Commonwealth Edison Environmental Director by NRC I&E representatives during recent inspections visits, the Environmental Director indicated that a recommendation would not be made during an emergency for selective evacuation. The guidance referenced above recommends that, if there are identifiable concentrations of children or women of childbearing age in the vicinity, these should be given special

consideration in the implementation of protective actions.

Further discussion of implementing procedures with the I&E inspectors indicated that the procedure for initial notification to offsite state and local authorities, who have responsibility and authority for implementing evacuation, includes the marshalling of Commonwealth personnel to make offsite surveys and dose projections on the basis of the surveys. The total time between the accident and notification to offsite authorities may then be as long as three hours. Although this procedure may be reasonable for accidents of lesser potential consequences it is our judgment that such a delay would be unnecessarily excessive for an event involving substantial core damage. The need for prompt assessment and notification is emphasized in the USAEC (NRC) Standard Review Plan Section 13.3-Emergency Planning Acceptance Criteria which specifies "Completion of initial accident assessment measures, including dose projection and notification to offsite authorities within fifteen minutes ...." Further guidance is in Regulatory Guide 1.101, Section 4.15, "Action-levels for severe short-term situations requiring rapid implementation of protective actions should be defined in terms of readily available information such as readings of effluent monitors or other onsite monitor indications. Implementation of protective actions may also be based on confirmatory measurements taken in the field to the extent it can be shown that field measurements can be taken and evaluated rapidly enough to permit adequate time for the protective actions to be accomplished."

The implementing procedures for GSEP should be reviewed and evaluated for conformance to the recommendations noted above.