Docket No. 50-373 Docket No. 50-374

Commonwealth Edison Company ATTN: Mr. Cordell Reed Senior Vice President Post Office Box 767 Chicago, IL 60690

#### Gentlemen:

We have received the two enclosed Federal Emergency Management Agency (FEMA) correspondences dated January 4, 1990, transmitting the findings for the offsite emergency preparedness aspects of the LaSalle Nuclear Power Station remedial exercise conducted December 7, 1988, and the unannounced drill conducted January 24, 1989.

FEMA identified no new deficiencies in the performances of offsite agencies during the drill or remedial exercise. Two previously identified deficiencies and four areas requiring corrective action (ARCA's) were successfully demonstrated during the December 7, 1988, remedial exercise. One existing ARCA and one new ARCA identified in the drill conducted January 24, 1989, remain and appropriate objectives related to these items should be planned for your next scheduled exercise.

Based on FEMAs review of drill and exercise reports, corrective remedial actions and scheduled corrective actions, FEMA concluded that offsite radiological emergency preparedness is adequate to provide reasonable assurance that appropriate offsite measures can be taken to protect the health and safety of the public living in the vicinity of the LaSalle Nuclear Power Station.

We fully recognize that corrective actions to be implemented may involve parties and political institutions which are not under your direct control. Nevertheless, we would expect the subject of offsite preparedness for the area around the LaSalle Nuclear Power Station to be addressed by you as well as others.

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In accordance with 10 CFR 2.790 of the commission's regulations, a copy of this letter and the enclosed FEMA report will be placed in the NRC Public Document Room.

Sincerely.

L. Robert Greger, Chief Reactor Programs Branch

Enclosure: As stated

cc w/enclosure:
T. Kovach, Nuclear
Licensing Manager
G. J. Diederich, Station
Manager
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
Richard Hubbard
J. W. McCaffrey, Chief, Public
Utilities Division
David Rosenblatt, Governor's
Office of Consumer Services

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## Federal Emergency Management Agency

Washington, D.C. 20472

DEC 21 1989

Mr. Frank J. Congel
Director, Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Congel:

Enclosed is a copy of the report for the remedial exercise conducted December 7, 1988, for the LaSalle Nuclear Power Station. The exercise participants were LaSalle County and the State of Illinois. The report was prepared by the Federal Emergency Management Agency (FEMA) Region V staff and transmitted to FEMA Headquarters on September 20, 1989. The December 7, 1988, revised remedial exercise report was received at FEMA Headquarters December 11, 1989.

The remedial exercise was conducted to correct four of the five areas requiring corrective action (ARCA's) and the two deficiencies that were identified in LaSalle County during the June 15, 1988, LaSalle Nuclear Power Station exercise. (A copy of the June 15, 1988, LaSalle Nuclear Power Station exercise report was transmitted by FEMA Headquarters to the Nuclear Regulatory Commission on December 28, 1988.) appropriate objectives regarding the ARCA's and deficiencies were successfully demonstrated during the December 7, 1988, remedial exercise. The ability to establish and operate rumor control (ARCA) was not selected by LaSalle County for demonstration during the remedial exercise. However, the appropriate objective will be demonstrated during the next LaSalle Nuclear Power Station exercise, currently scheduled for June 6, 1990, and additional verification of corrective action implementation will be provided by FEMA.

Based on our review of the final exercise report and corrective remedial actions, FEMA considers that offsite radiological emergency preparedness is adequate to provide reasonable assurance that appropriate offsite measures can be taken to protect the health and safety of the public living in the vicinity of LaSalle Nuclear Power Station in the event of a radiological emergency occurring at that site. Therefore the approval of the offsite plans for the LaSalle Nuclear Power Station granted under 44 CFR 350 on June 4, 1982, continues to be in effect.

If you have any questions, please feel free to contact me on 646-2871.

Sincerely,

Dennis H. Kwiatkowski
Assistant Associate Director
Office of Natural and
Technological Hazards

Enclosure

### LaSalle Nuclear Power Station Remedial Exercise (December 7, 1988)

The Radiological Emergency Preparedness remedial exercise of the LaSalle Nuclear Power Station was conducted on December 7, 1988. The exercise participants were Lasalle County and the Illinois Emergency Services and Disaster Agency (IESDA), Springfield, Illinois.

The remedial exercise was conducted to remedy deficiencies (i.e., NUREG criteria items Ald and E6) and weaknesses, except for NUREG criteria item G4c (per attachment #1), that were identified in LaSalle County during the June 15, 1988 exercise of the LaSalle Nuclear Power Station. The demonstration of the ability to establish and operate rumor control (NUREG criteria item G4c) was not selected by LaSalle County, nor required by FEMA, for demonstration during the remedial exercise. However, the objective must be demonstrated during the next exercise of the LaSalle Nuclear Power Station.

The County EOC staff, through coordination with IESDA, successfully demonstrated the aforementioned deficiencies and weaknesses identified during the June 15, 1988 exercise of the LaSalle Nuclear Power Station.

The staff of the LaSalle County Emergency Operations Center (EOC) demonstrated the ability to fully alert, mobilize and activate personnel for both facility and field-based emergency functions. The exercise was initiated at 0907 when the dispatchers in the LaSalle County Sheriff's Department were notified of Alert conditions at the LaSalle Nuclear Power Station, by the IESDA dispatcher at Springfield, Illinois. Upon receipt of the Alert notification the Sheriff's dispatchers verified the call via a telephone call back to IESDA at Springfield. Thereafter, the dispatcher notified the County ESDA coordinator, who was on duty in his office; the County Sheriff and the County Board Chairman.

The call up and activation of the balance of the EOC staff was initiated from the EOC, by the County ESDA coordinator and staff. The staff were notified by use of up-to-date, written telephone call up lists, by both the Sheriff's dispatchers and the EOC staff. The EOC was staffed in a timely manner and in accordance with the plan. The staff also coordinated information with the municipalities of Grand Ridge, Marseilles, Seneca, Kinsman, Ransom and Verona.

The demonstration of the County's ability to fully alert, mobilize and activate personnel for both facility and field based emergency functions corrected the weakness identified in LaSalle County during the June 15, 1988 exercise.

The staff demonstrated the ability to monitor, understand and use

Emergency Classification Levels (ECLs), through the appropriate implementation of emergency functions and activities corresponding to ECL's, as required by the scenario.

The emergency classification levels were prominently displayed in the EOC. The staff was aware of the current ECLs as the exercise progressed. All relevant functions and activities were implemented in a manner that is consistent with the organization's plan and procedures. LaSalle County was notified of the Alert conditions at 0907, the Site Area Emergency at 0936 and the General Emergency at 1010. The staff verified each message by a telephone call back to the IESDA dispatcher.

The ECC staff demonstrated the ability to direct, coordinate and control emergency activities. The County ESDA coordinator, in consultation with the executive group (County Board Chairman and the County Sheriff), was the individual that was effectively in charge of the ECC operations. Briefings were held to update the staff on the situation. The staff were actively involved in the briefings and participated in decision making. Copies of the plan were available in the ECC for reference and the staff had excerpts of the plan that pertained to their respective responsibilities. Message logs were kept for all incoming and outgoing messages and general transmissions. Messages were reproduced and distributed as necessary, by use of an effective message handling system.

Protective action decisions and implementation of the decisions were coordinated effectively with all appropriate organizations. The relevant functions and activities were implemented in a manner that is consistent with the organization's emergency plan and procedures.

The County's demonstration of the ability to direct, coordinate and control emergency activities and their ability to monitor, understand and use emergency classification levels, through the appropriate implementation of emergency functions and activities corresponding to each emergency classification level, corrected the deficiency that was identified in the County during the June 15, 1988 exercise.

The staff demonstrated the ability to communicate with all appropriate locations, organizations, and field personnel by use of commercial telephone and two-way radio. Conferencing via telephone is available in the EOC. There are NARS telephone lines in the EOC and the County Sheriff's dispatch center. However, the NARS was not used during the remedial exercise because of an onsite exercise at another utility site. The NARS was effectively demonstrated during the June 15, 1988 exercise. A datafax machine was available in the EOC for hard copy capability between County EOCs, the State EOC and the JPIC. The datafax machine was reliable and reasonably fast.

The staff demonstrated the adequacy of facilities, equipment, displays and other materials to support emergency operations.

The EOC facility has sufficient furnishings, space, lighting, restrooms, telephones, backup electrical power and other amenities to support extended EOC operations. Emergency classification levels were posted and a status board was clearly visible to the EOC staff. The status board was kept up to date on significant events by EOC staff assigned that responsibility. The required maps were posted in the EOC. The maps depicted the plume EPZ with sectors labeled, evacuation routes, relocation centers, access control points, radiological monitoring points, and population by evacuation areas.

The staff's demonstration of the use of equipment and displays and the timely posting of information corrected the weakness that was identified in the County during the June 15, 1988 exercise.

The staff demonstrated the ability to initially alert the public within the 10 mile EPZ and begin dissemination of an instructional message within 15 minutes of a decision by appropriate State and local officials.

The initial alerting of the public within the 10 mile EPZ was initiated by the County after the staff was notified of the Site Area Emergency by IESDA. The SAE notification included both an evacuation and sheltering PAR.

The initial PAR was received by the County at the Site Area Emergency notification, at 0936. The protective action recommended the evacuation of all individuals 0-2 miles in all sectors and in place sheltering of all individuals 2-5 miles in the three downwind sectors (L, M and N). The message also included a livestock advisory, which recommended that milk producing livestock, within a 10 mile radius of the utility, be sheltered, fed from stored feed and provided protected drinking water.

Upon receipt of the foregoing PAR the EOC staff, in consultation with the executive group, simulated activation of the EBS station at 0940 and the sounding of the sirens at 0943. The staff coordinated the sounding of the siren system with personnel at the siren activation point, in the County Sheriff's Department. The timing of public instructions were coordinated with the public alerting process, so that public alerting was followed immediately by an instructional message.

The County received notification of the General Emergency, from IESDA at 1012. The General Emergency notification contained an expanded evacuation and sheltering PAR. The protective action recommendation to the County was that evacuation, in the aforementioned three downwind sectors (L, M and N), be expanded out to 5 miles and that individuals 5-10 miles in the same three downwind sectors (L, M and N) be sheltered. The initial livestock advisory, issued at the Site Area Emergency notification, was left in-tack.

Again, the staff, in consultation with the executive group,

simulated notification of the EBS station and coordinated the sounding of the siren system with personnel at the siren activation point, in the County Sheriff's Department. The EBS station was activated at 1020 and the sirens sounded at 1023.

The foregoing demonstration of the staff's ability to initially and subsequently alert the public and begin dissemination of accurate information and instructions to the public in a timely fashion corrected the deficiency that was identified in the County during the June 15, 1988 exercise.



# Federal Emergency Management Agency

Washington, D.C. 20472

DEC 21 1989

Mr. Frank J. Congel
Director, Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Congel:

Enclosed is a copy of the report for the unannounced drill conducted January 24, 1989, for the LaSalle Nuclear Power Station. The LaSalle County Emergency Operations Center was activated for the drill. The report was prepared by the Federal Emergency Management Agency (FEMA) Region V staff and transmitted to FEMA Headquarters.

There were no deficiencies identified during the January 24, 1989 unannounced drill. However, one area requiring corrective action (ARCA) regarding communication capabilities was identified. The appropriate objective related to the ARCA will be demonstrated during the next LaSalle Nuclear Power Station exercise currently scheduled for June 6, 1990.

Based on our review of the unnannounced drill report and the scheduled corrective action, FEMA considers that offsite radiological emergency preparedness is adequate to provide reasonable assurance that appropriate offsite measures can be taken to protect the health and safety of the public living in the vicinity of LaSalle Nuclear Power Station in the event of a radiological emergency occurring at that site. Therefore the approval of the offsite plans for the LaSalle Nuclear Power Station granted under 44 CFR 350 on June 4, 1982, continues to be in effect.

If you have any questions, please feel free to contact me on 646-2871.

Sincerely,

Dennis H. Kwiatkowski

Assistant Associate Director

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Office of Natural and Technological Hazards

Enclosure

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#### LASALLE COUNTY EOC UNANNOUNCED DRILL 1-24-89

The LaSalle County Sheriff's Department received NARS notification of the incident at 10:01. The call verification to IESDA was completed by 10:05. LaSalle County EOC staff members were then immediately notified by two Sheriff's deputies via commercial telephone. Notification was completed by 10:14. There were no delays, and the telephone numbers on the list were accurate. A prescripted meesage typed at the top of the call list was read to each of the persons notified.

The FEMA evaluator, who was initially stationed at the Sheriff's Department, arrived at the EOC at 10:18. Upon his arrival, several personnel were already present in the EOC. The rapidity of the mobilization process suggests that many of the EOC members may have been present within the Criminal Justice Building prior to the beginning of the drill; such as the County Sheriff, two deputies, and the ESDA Coordinator. Three other assistants were also present. One assistant, who was described as a trainee, had arrived at the EOC at 8:00 that morning. This individual was not named on the EOC staff list. This trainee had established the sign-in desk and documentation process, and referred to herself as a "recorder". Most of the EOC members seemed to arrive within 15-20 minutes of their notification. If this were an off-hours drill, the mobilization may not have been as rapid.

Conclusion: Objective #2, Mobilization of Emergency Personnel, was met.

Play began with receipt of the NARS notification of the Site Area Emergency at 10:01. The dispatcher who received the call was able to note all conveyed information accurately and without line interference. The verification call placed to IESDA, Springfield was answered within 15 seconds of placement. The verification process itself was completed within one minute (10:05). By 10:06 the notification of EOC staff members by two Sherrif's deputies that begun via commercial telephone. No problems in reception or transmittal were observed. The use of pagers enabled certain EOC members to be reached in their cars. A total of 16 separate lines were available in the EOC, and this was sufficient for each EOC member to have a phone for his/her exclusive use.

Primary communications to the EOC (other than commercial lines) are regularly handled through the LaSalle County Sheriff's dispatcher's office. The latter organization is responsible for relaying all messages to the EOC; this resulted in a two-step communication process.

The EOC staff included a Public Information Aide, who had a single line devoted to this purpose. Rumor control was not demonstrated nor was it required.

Very few of the communications systems available to the LaSalle County EOC were actually demonstrated during the unannounced drill. Those which were demonstrated included the NARS and commercial lines available to each of the agency representatives on the EOC staff. The evaluator had to specifically request to be shown what other communications systems were potentially available to EOC operations. These systems included primary radio links between LaSalle County Sheriff's department and its patrol cars; secondary radio links to municipal law enforcement and emergency response organizations; point-to-point communications; the ISPERN system; a RACES base station; VHF and Low Band radio connections to te EOC (DC controlled speaker system) and walkie talkies. None of these systems were demonstrated. No ham operators were present at the EOC, although the evaluator was told that the EOC had established contacts with three ameteur radio clubs.

Conclusion: Objective #4, Communications, was partially met.

The LaSalle County EOC is located below grade, in the basement of the LaSalle County Criminal Justice Building. EOC operations were carried out in a designated space approximately 25 x 30 feet in size formed by the substructural walls of the building. This three-sided space could be closed off and locked up by means of a gate. At the time of the FEMA evaluator's arrival, a door-sized opening had been made at the gate. At this point, an access control/security desk had been established. Each EOC member was required to sign-in upon arrival. The documentation used for this purpose was the dosimetry log (dosimetry was available at the desk but was not dispensed to EOC members). No distinct security log was used because the dosimetry log served this function. However, one shortcoming of this procedure is the absence of institutional affiliation data on the security log. This could complicate the tracking of late arrivals among the EOC staff.

All needed displays were available at the EOC. The main status board was updated promptly and was used to record the time and nature of critical communications. Activity sheets were distributed to each of the EOC staff members for documenting contacts with their respective agencies. The evaluator was shown the back-up electrical generator available to the Criminal Justice Building, and was told a smaller, portable generator was available to the EOC proper, in the event that the CJB back-up failed.

Ventilation, seating, table-space and restrooms were adequate for extended operations within the EOC.

Conclusion: Objective #5, Facilities, Equipment, and Displays, was met.

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The drill began at 10:01 and proceeded according to the specifications of the plan. After receiving the notification call, the LaSalle County Sheriff's dispatcher requested verification of the Site Area Emergency (10:03-10:05). Members of the EOC were alerted by commercial telphone during the period 10:06 to 10:14. This notification was prompt and efficient. Overall, the names and telephone numbers used were accurate and up-to-date. This accelerated notification phase was possible through the use of two persons making simultaneous calls to different EOC personnel. This greatly reduced the time needed to activate the EOC. However, as mentioned previously, a large number of EOC staff members were onscene at the EOC at the time of the evaluators arrival at 10:18. This may suggest that a large portion of the EOC staff, by virtue of their daily responsibilities, were conveniently situated in relation to the EOC at the time of the unannounced drill.

Upon arrival at the EOC, staff members established contact with their respective agencies, as directed by the County ESDA Coordinator. Even though the duration of the drill was brief, the coordinator conducted periodic briefings in order to update EOC staff on the emergency situation. During the period 10:11 through 10:26, communication linkages were established with the following municipal EOC's: Seneca, Marseilles, Ransom, and Grand Ridge (in accordance with stated objectives) as well as with the Grundy County EOC and the IESDA Springfield as specified in the plan. The Department of Nuclear Safety and CECO were also contacted during this period. These institutions were not represented at the LaSalle County EOC despite the provision of seats for these representatives.

Conclusion: Objective #36, Unannounced and Off-Hours, was met.

### Areas Requiring Corrective Action:

Several important communications systems were not demonstrated during the unannounced drill. The systems were shown to the evaluator only after the evaluator urged the staff to demonstrate the equipment. No ham operators were present at the EOC to participate in the drill. These systems should be demonstrated during the drill to insure that they are functioning properly in the event of an emergency.

Areas Recommended for Improvement:
The EOC staff list should be updated. The "recorder" trainee person, whose name did not appear on the list, was acting as controller of the security desk, which is not representative of appropriate procedures.

Areas Recommended for Improvement:
The dosimetry record form should not have been used as a general sign-in sheet. This type of form does not include institutional affiliation and may complicate the tracking of late arrivals or the participation of unknown auxiliaries. A designated EOC staff sign-in sheet should be developed and used for this purpose.