

**Commonwealth Edison**

One First National Plaza, Chicago, Illinois  
 Address Reply to: Post Office Box 767  
 Chicago, Illinois 60690

March 31, 1982

PRINCIPAL STAFF	
DIR	<i>W. E. G. S.</i>
D/D	PAO
A/D	SLO
DRSPL	
DEATI	
DEPAS	File <i>has</i>

Mr. James G. Keppler, Regional Administrator  
 Directorate of Inspection and  
 Enforcement - Region III  
 U.S. Nuclear Regulatory Commission  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

*orig 1*

Subject: Quad Cities Station Units 1 & 2  
 Response to Emergency Preparedness  
 Appraisal Appendix A & Appendix B  
 Items (I.R. No. 50-254/82-02 and  
 50-265/82-02  
NRC Docket Nos. 50-254 and 50-265

Reference (a): J. G. Keppler letter to Cordell Reed  
 dated March 1, 1982.

Dear Mr. Keppler:

Reference (a) provided the results of a special NRC appraisal of the emergency preparedness program at the Quad Cities Nuclear Power Station. Enclosed are the Commonwealth Edison Company responses to the improvement items identified in Appendices A and B to Reference (a).

To the best of my knowledge and belief the statements contained in the attachment are true and correct. In some respects these statements are not based on my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

Please address any questions you may have concerning this matter to this office.

Very truly yours,

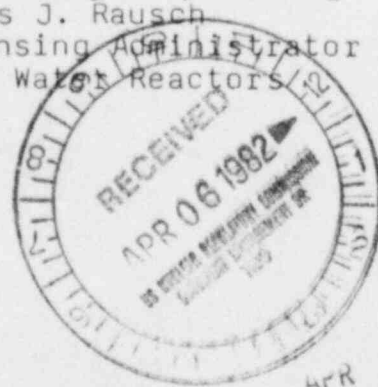
*Thomas J. Rausch*

Thomas J. Rausch  
 Nuclear Licensing Administrator  
 Boiling Water Reactors

lm  
 cc: Region III Inspector - Quad Cities

SUBSCRIBED and SWORN to  
 before me this 31st day  
 of March, 1982

*Rosalie A. Pieta*  
 Notary Public



HFR 2 1982

B204070107 820331  
 PDR ADCK 05000254  
 F PDR

*IE36*  
*5/1*

Response to Appendix A  
Significant Appraisal Items

- 1.a. The first aid/decontamination facility is currently being renovated. A new storage area for equipment and supplies has been created, and it is our intent to have the first aid/decontamination facility cleaned up and provided with adequate space by June 1, 1982.
- 1.b. The interim EOF has been provided with a copy of the FSAR and a set of piping and instrument diagrams.
- 2.a. Procedure revisions to the QOA and QGA procedure manuals have been initiated to provide tables in the front of the manuals listing those procedures which could conceivably result in a GSEP classification. A statement is made to the effect that the user is to inform the Shift Engineer or Station Director requiring possible classification of the event. The master copies of these procedures have been marked to assure that this statement is to be provided and implemented during the next revision to these procedures. The tables in the QOA and QGA procedure manuals will be in-place by May 1, 1982.
- 2.b. A new procedure has been written, QEP 110-2, which will provide the Acting Station Director simplified instructions as to event classification, notifications, use of the NARS Form, use of RCTs, and sounding the plant siren. This procedure is presently being reviewed by the Rad/Chem Supervisor, and it is intended to implement the procedure by April 1, 1982. Training of the Acting Station Directors on the use of this new procedure is to be completed by May 1, 1982.
- 2.c. Procedure QEP 360-3 has been revised to indicate the initiation of a site evacuation for a site area or general emergency, as specified in GSEP Section 6.4.1.
- 2.d. Procedures QEP 310-T1 and QEP 320-1 are being revised to provide a phone tree and a prioritized listing to insure timely shift augmentation. These procedures are presently in typing, and will be implemented by May 1, 1982. The May 1, 1982 commitment date is specified in the Confirmation of Action letter dated February 2, 1982. Appendix A of the Inspection Report is in error in this regard.
- 2.e. The Corporate Command Center Director's call list has been prioritized to have a Recovery Manager at the EOF within 60 minutes of activation. A letter was issued by the Division Vice President-Nuclear Stations to document this on January 27, 1982. The letter and prioritized list have been placed in the Station Director's EPIP Book attached to procedure CC-1 in the interim, until CC-1 is revised to reflect completion of the permanent EOFs in October 1982.

Response to Appendix A  
T. J. Rausch  
Page 2  
March 25, 1982

- 2.f. The revised protective action recommendations table, QEP 350-T1, has been implemented. The revised GSEP table 6.3-1 has been on-site and off-site reviewed, and is presently being printed for distribution. This revision to GSEP should be implemented by April 1, 1982.
- 2.g. Procedure QEP 530-2 has been revised to add a monthly test of the NRC Emergency Notification System. Checklist QEP 530-S3 has been developed to document the performance of this test.
- 2.h. Procedure QEP 360-3 has been revised to describe the method of notifying personnel in buildings outside the protected area when a site evacuation is imminent.

Response to Appendix B  
Program Improvement Items

1. Procedures QEP 110-1, 120-1, 130-1, 140-1, 170-1, and 180-1 have been revised to include appropriate QEP procedures as references. These procedures involve the Station Director, Operations Director, Technical Director, Maintenance Director, Security Director and the Rad/Chem Director.
2. It is our intent to have the QEP Manuals in the Control Room, Shift Engineer's Office, and the TSC tabbed to provide for easy access to critical procedures. A memo is to be sent to the holders of the remaining QEP Manuals providing a recommended scheme for tabbing the procedures, to be done at their discretion.
3. QEP 130-1 has been revised to specify a list of operational and radiological parameters which are critical to the Technical Director's evaluation, and should be trended during an emergency as deemed applicable.
4. A cross-reference procedure table is being developed to provide a reference scheme between QRP, QCP, and QEP procedures. An overview procedure is not judged to be necessary.
5. Additional GSEP Manuals have been requested from the Radioecology and Emergency Planning Group, Technical Services Nuclear Department at the Corporate Office. Not all Station Group Director backup personnel are to be issued GSEP Manuals. If these personnel share office space with or are in close proximity to personnel who presently do have manuals, it is felt that additional manuals are not necessary.
6. Procedure QEP 340-5, Station Fire Fighting, has been revised to require that the emergency be classified as an appropriate GSEP condition per QEP 200-T1. Also, the SCRE is charged with utilizing the Fire Hazards Analysis to determine if the fire affects any safe shutdown equipment and to advise the Shift Engineer accordingly.
7. Increased emphasis has been placed on the need to replace the survey instruments with others when calibrations are due. A computer-based system for tracking instrument calibrations is being developed, and should be implemented in the near future.
8. GSEP Revision 3 is to be issued shortly, and will require semi-annual offshift augmentation notification drills.
9. QEP 550-2 and checklists QEP 550-T1 through T6 provide for the inventory of emergency equipment in the environs sampling lockers, and at the OSC, EOF, TSC, and at Jane Lamb Hospital.

10. The Class A Model for the process computer and PRIME computer is to be installed which will obtain real-time meteorological data, and utilize release information to aid in predicting protective action recommendations.
11. The Station is presently reviewing the need for a procedure for on-site surveys. A possible course of action is to specify that EG-3 be used for this purpose.
12. QEP 180-1 has been revised to dispatch RCTs to the assembly areas for monitoring and decontamination, and to the machine shop to monitor the area.
13. Procedures QEP 110-1 and QEP 180-1 are being revised to specify when and in what order samples should be collected for reactor coolant, containment air, and effluents. New procedure QEP 110-2 is also to contain this information.
14. Copies of the Sargent & Lundy plant shielding design study have been provided to the TSC and the EOF.
15. Space in the emergency kits does not allow room for additional survey instruments. However, new probes and batteries were added to the kits to enhance instrument availability and operability.
16. Counting geometries for the multi-channel analyzers are to be developed by the C.E.Co. radiochemistry group in the Technical Services Nuclear Department at the Corporate Office.
17. The calibration check sources are available, but a procedure is needed to be written to perform the source check. This item will be completed in the near future.
18. The backup computer disks for PARAPS have been ordered.
19. The Station feels that there is no justification for a procedure for sampling high level liquid effluents. The possibility of having high radiation levels in the discharge bay is extremely remote and does not warrant the need for a sampling procedure.
20. Procedure QEP 360-2 has been revised to provide the names of non-essential personnel to the Security Director if a site evacuation is required.
21. Protective clothing is already provided in, or adjacent to the TSC, OSC, machine shop, and the Unit 1 Trackway. Clothing is to be provided for the Unit 2 Trackway. It is anticipated that about 12 sets of clothing will be provided.

22. The most recent inventory has been provided in each emergency kit.
23. A status review of available Station vehicles is to be documented on a periodic basis to ensure the availability of vehicles for use by the field monitoring teams.
24. A procedure change to QEP 110-1 has been submitted to indicate that the Operations Director is responsible for implementing assembly procedures.
25. A review has been conducted for identical and similar procedures which could be consolidated, updated, or deleted. Initiation of appropriate procedure revisions is in progress.
26. Procedure table QEP 330-T2 has been revised to include the correct dose factors.
27. Procedure QEP 370-1 has been revised to have the RMC Manual included as a reference in the procedure.
28. Since procedure QEP 370-1 is basically identical to the RMC Manual, and the Manual is provided in the first aid/decontamination facility, there is no need to place a copy of QEP 370-1 in the facility.
29. The telephone jacks in the interim EOF have been repaired.