

APPENDIX

NOTICE OF DEFICIENCIES

As a result of the inspection conducted on January 3-7, 1983, the following deficiencies in your emergency preparedness program were identified:

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50. Section IV.D.2 of Appendix E requires that an applicant's emergency plans shall include information to demonstrate compliance with the following:

Provisions shall be described for yearly dissemination to the public within the plume exposure pathway Emergency Planning Zone (EPZ) of basic emergency planning information.

Section 8.4 of the generic Generating Station Emergency Plan (GSEP) states in part that Commonwealth Edison is committed to distribute informational brochures on an annual basis.

DEFICIENCY

Contrary to the above, the following deficiency was identified:

- Public information brochures were distributed during April 1981 and were not distributed again until December 1982, an intervening period of 20 months, which is greater than the annual period prescribed in Section IV.D.2 of Appendix E. (Paragraph 5)
(010/83-01-01; 237/83-01-01; 249/83-01-01)
2. 10 CFR Part 50, Appendix E, Section IV.B states:

The means to be used for determining the magnitude of and for continually assessing the impact of the release of radioactive materials shall be described, including emergency action levels that are to be used as criteria for determining the need for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.... These emergency action levels shall be discussed and agreed on by the applicant and the State and local governmental authorities and approved by the NRC. They shall also be reviewed with the State and local governmental authorities on an annual basis.

DEFICIENCY

Contrary to the above, the following deficiency was identified:

- . As of the time as this inspection, the licensee had not reviewed the emergency action levels with the State and local governmental authorities since April 1, 1981, the implementation date of the new emergency preparedness regulation (10 CFR 50, Appendix E). This is not in conformance with the requirement to review emergency action levels annually with State and local officials. (Paragraph 4) (010/83-01-02; 237/83-02-02; 249/83-01-02)
3. 10 CFR Part 50, Appendix E, Section IV.D.3 requires that:

A licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency.

Pursuant to Appendix E, Section IV.C, emergencies include:

(1) Notification of Unusual Event, (2) Alert, (3) Site Area Emergency, and (4) General Emergency.

DEFICIENCY

Contrary to the above, the licensee has not demonstrated the capability to comply with the notification period prescribed in Section IV.D.3 in that for six of the seven emergency declarations during the period January 1, 1982, through December 31, 1982, notification of responsible State authorities took longer than fifteen minutes. (Paragraph 3) (010/83-01-03; 237/83-01-03; 249/83-01-03)