

DCD

September 23, 1994

Commonwealth Edison Company
ATTN: Mr. Mike Wallace
Vice President, Chief
Nuclear Officer
Executive Towers West III
1400 Opus Place, Suite 900
Downers Grove, IL 60515

SUBJECT: IMPLEMENTATION OF COMED'S INTERIM EMERGENCY OPERATIONS FACILITY

Dear Mr. Wallace:

I am forwarding to you a copy of the NRC's September 19, 1994, request for additional information regarding ComEd's use of its corporate emergency operations facility (EOF) as an interim EOF during the time it would take for your near-site EOFs to become staffed. Although the original request was addressed to Mr. D. L. Farrar, I am bringing this specifically to your attention because of the protracted time that this issue has gone unresolved. I am particularly concerned with ComEd's inability to self-identify and correct problems that we have identified with your implementation of this proposal.

After your staff has had an opportunity to develop a response to the request for additional information, I request that your and my staff along with appropriate NRR staff meet to thoroughly review your proposed actions to assure that all the issues have been appropriately addressed. Arrangements for this meeting should be made through Jim McCormick-Barger of my staff at (708) 829-9872.

If you have any questions concerning this matter, please call me.

Sincerely,

Original Signed by John B. Martin

John B. Martin
Regional Administrator

Enclosure: As Stated

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SEE PREVIOUS CONCURRENCE PAGE

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OFFICE	RIII	RIII	RIII	RIII	RIII	RIII	E
NAME	JMcCormick-B	CPederson	WAxelson	EGreenman	JMartin		
DATE	09/ /94	09/ /94	09/ /94	09/ /94	09/ /94		

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Commonwealth Edison Company
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Dear Mr. Wallace:

I am forwarding to you a copy of the NRC's September 19, 1994, request for additional information regarding ComEd's use of its corporate emergency operations facility (EOF) as an interim EOF during the time it would take for your near-site EOFs to become staffed. Although the original request was addressed to Mr. D. L. Farrar, I am bringing this specifically to your attention because of the protracted time that this issue has gone unresolved. I am particularly concerned with ComEd's inability to self-identify and correct problems that we have identified with your implementation of this proposal. The actions taken by ComEd to date to address this important issue have been unacceptable. I request your attention be directed at resolving this issue.

After your staff has had an opportunity to develop a response to the request for additional information, I request that your and my staff along with appropriate NRR staff meet to thoroughly review your proposed actions to assure that all the issues have been appropriately addressed. Arrangements for this meeting should be made through Jim McCormick-Barger of my staff at (708) 829-9872.

If you have any questions concerning this manner, please call me.

Sincerely,

John B. Martin
 Regional Administrator

Docket Nos. 50-456, 50-457;
 50-454, 50-455; 50-010,
 50-237, 50-249; 50-373,
 50-374; 50-254, 50-265;
 50-295, 50-304

See Attached Distribution

DOCUMENT NAME: b:ceof

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OFFICE	RIII	C	RIII	N	RIII	RIII	RIII
NAME	JMcCormick-B		CPederson		WAnderson	EGreenman	JMartin
DATE	09/20/94		09/20/94		09/20/94	09/20/94	09/ /94



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

September 19, 1994

Mr. D. L. Farrar
Manager, Nuclear Regulatory Services
Commonwealth Edison Company
Executive Towers West III, Suite 500
1400 OPUS Place
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION RELATED TO THE PROPOSED USE OF THE CORPORATE EOF AS AN INTERIM EOF (TAC NOS. M84864, M84865, M84866, M84867, M84868, M84869, M84870, M84871, M84872, M84873, M84874, AND M84875)

Dear Mr. Farrar:

In NRC Inspection Report 50-237/92022, dated August 20, 1992, the NRC staff identified a concern that the Commonwealth Edison Company's (ComEd) emergency plan does not provide for timely augmentation of ComEd's emergency response organization to relieve the control room and technical support center of off-site emergency response functions. In response to this concern, ComEd proposed to use the corporate emergency operations facility (EOF), staffed within about 1 hour following an emergency, as an interim EOF until the near-site EOF could be staffed.

The NRC staff has observed the implementation of your plan during numerous emergency exercises and drills at various ComEd sites and has repeatedly identified concerns with ComEd's capability to effectively perform emergency response functions using the corporate EOF as an interim EOF. Inspection Reports 50-456/94003, 50-457/94003, 50-454/94008, 50-455/94008, 50-254/94015, and 50-265/94015 document the concerns that have been identified. A summary of our concerns and request for additional information (RAI) is enclosed.

We request you provide a response to the concerns and RAI included in the enclosure within 30 days of receipt of this letter, so that we can complete our evaluation of your proposal and provide our recommendation to the Commission. If there are any questions regarding this RAI, please contact George F. Dick at (301) 504-3019.

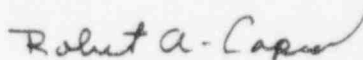
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Mr. D. L. Farrar

- 2 -

This requirement affects one respondent and, therefore, is not subject to the Office of Management and Budget review under P.L. 96-511.

Sincerely,



Robert A. Capra, Director
Project Directorate III-2
Division of Reactor Projects - III/IV
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-454, STN 50-455
STN 50-456, STN 50-457
50-237, 50-249, 50-373
50-374, 50-254, 50-265
and 50-295, 50-304

Enclosure: Request for Additional Information

cc w/encl: See next page

Mr. D. L. Farrar

Commonwealth Edison Company

cc:

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REQUEST FOR ADDITIONAL INFORMATION

COMMONWEALTH EDISON COMPANY

TO SUPPORT THE REVIEW OF

GSEP REVISION 93-01

The following information is requested to support the NRC's review of Commonwealth Edison Company's (ComEd) Revision 93-01 to its Generating Stations' Emergency Plan.

1. CONCERNS IDENTIFIED DURING EMERGENCY EXERCISES AND DRILLS

The following concerns have been identified during emergency drills and exercises performed to demonstrate the implementation of your emergency plan.

a. Communications Between Emergency Response Facilities

Technical staff in the corporate emergency operations facility (EOF) have had difficulty communicating with their counterparts in other emergency response facilities. In addition, the corporate EOF staff has had difficulty obtaining current plant status.

Provide information regarding your plans for correcting these communication deficiencies.

b. Lack of Support Staff to Perform Emergency Response Functions

The corporate EOF was unable to adequately perform the following functions with the staff specified for the corporate EOF:

- emergency notification system (ENS) communicating
- health physics network (HPN) communicating
- off-site survey team control
- government liaison interfacing
- public affairs interfacing
- status board maintenance

Provide information regarding your plans to accomplish these functions in the corporate EOF.

c. Transfer of Command and Control

Transfer of command and control to the corporate EOF did not occur during two exercises. Since that time, you committed to revise your implementing procedures to specify the criteria to be used to determine when and if command and control is to be transferred to the corporate EOF.

ENCLOSURE

Provide information regarding: (1) the nature and status of the procedure changes, (2) the nature and status of training on these procedure changes (including the number of emergency response personnel trained), and (3) any additional actions taken to assure efficient transfer of command and control to and from the corporate EOF.

d. **Untimely Determination of Emergency Classification and Protected Action Recommendations**

Due to a combination of the lack of support staff and communication problems, emergency classification and protective action recommendations from the corporate EOF were observed to be untimely.

Provide information regarding your plans to correct this deficiency.

It appears that you do not consider it necessary to equip and staff the corporate EOF to perform all the duties normally performed at the near-site EOF. However, in consideration of the important functions that need to be performed at the corporate EOF and the uncertainty in the time the corporate EOF will need to be in "command and control," it is appropriate for the corporate EOF to be staffed and equipped similar to the near-site EOFs.

2. **ACTIVATION OF EMERGENCY RESPONSE FACILITIES**

The staffs for both the corporate EOF and the near-site EOF are prestaged for exercises. Therefore, the real-time activation of these facilities are not tested during your emergency exercises.

Provide information regarding your plans to test the real-time activation of your emergency facilities.

3. **RESULTS OF AUGMENTATION DRILLS**

The concern with the timeliness of the staffing of the near-site EOFs was identified during an augmentation drill performed in July 1992. Since that time, changes have occurred to your emergency plan and emergency response organization which would affect your augmentation capability.

Provide the results of augmentation drills performed since July 1992.

4. **BENEFIT OF THE USE OF THE CORPORATE EOF RELATIVE TO STAFFING THE NEAR-SITE EOFS WITHIN ABOUT 1 HOUR**

In your response to Inspection Report 50-237/92022, you provided information regarding the benefits of the your staffing plans and the use of the corporate EOF. This response did not address negative aspects of your plan, such as not assuming the ENS and HPN functions from the technical support center (TSC), as well as not assuming the control of the field teams from the TSC.

Provide information regarding your assessment of the additional burden the on-site emergency response facilities bear due to your plan for staffing the near-site EOF with corporate and unaffected station personnel and using an interim corporate EOF.

5. IMPACT OF REVISING EMERGENCY PLAN TO STAFF THE NEAR-SITE EOF WITHIN ABOUT 1 HOUR

In order to provide a balanced assessment of your proposed use of the corporate EOF versus staffing the near-site EOFs within about 1 hour after an emergency declaration, information on what the impact of revising your emergency plan and emergency response organization to accommodate staffing of the near-site EOF within about 1 hour is needed.

Provide information regarding the consequences of revising your emergency plan and emergency response organization to accommodate staffing of the near-site EOF within about 1 hour following an emergency declaration.

6. RELOCATION OF CORPORATE ENGINEERING STAFF

It has come to our attention that ComEd is restructuring its organization to locate corporate resources at the nuclear plant sites.

Provide information on any organizational changes that may affect the staffing of the corporate or near-site EOFs.