



**Commonwealth Edison**  
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September 16, 1983

Mr. J. G. Keppler, Director  
U.S. Nuclear Regulatory Commission - Region III  
799 Roosevelt Rd.  
Glen Ellyn, IL 60137

Subject: LaSalle County Station Units 1 and 2  
Response to Inspection Reports  
Nos. 50-373/83-27 and 50-374/83-27  
NRC Docket Nos. 50-373 and 50-374

Reference (a): C. J. Paperiello letter to Cordell Reed  
dated August 9, 1983.

Dear Mr. Keppler:

This letter is in response to the inspection conducted by Messrs. Ploski et al. on July 11, 12, and 14, 1983 of activities at LaSalle County Station. The Commonwealth Edison response to the concerns expressed and the six exercise weaknesses identified in the inspection report is attached. Mr. R. D. Walker granted an extension from September 8 to September 16, 1983 for this response.

To the best of my knowledge and belief the statements contained herein and in the attachment are true and correct. In some respects these statements are not based upon 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.

If you have any further questions on this matter, please direct them to this office.

Very truly yours,

D. L. Farrar  
Director of Nuclear Licensing

DLF/lm

cc: NRC Resident Inspector - LSCS

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## Attachment

In his August 9, 1983 letter, Mr. Paperiello expressed NRC concerns regarding use of a less than fully qualified Shift Engineer for the exercise and the possible misinterpretation held by Commonwealth Edison personnel that an exercise is just another drill for training.

### CONCERN

The Shift Engineer for the exercise was not fully qualified to hold this position during normal plant operation.

### RESPONSE

The Exercise Shift Engineer was actually a SRO licensed Shift Foreman with extensive experience as a Control Room Supervisor. Experienced licensed shift supervisors are routinely selected to participate in GSEP drills and exercises. As reported in Section 4a of the inspection report, the individual's performance was generally satisfactory.

### CONCERN

Commonwealth Edison staff perception of exercises as drill for training personnel.

### RESPONSE

The members of the Emergency Planning staff recognize that the primary purpose of an exercise is to demonstrate capabilities to perform an emergency response operation. However, exercises provide the opportunity to concurrently accomplish other goals such as:

- a. Determining if changes to procedures would improve emergency response.
- b. Reviewing the arrangement of facilities.
- c. Evaluating the utility of changes to procedures or facility arrangement at one station before widespread implementation.
- d. Training directors, managers, and staff members to perform their emergency response duties as part of the larger emergency response organization.

From time to time, Commonwealth Edison Company has assigned an employee to fill a GSEP position during an exercise who is not yet identified in the position list in the GSEP Telephone Directory. In such cases, employees have been judged qualified to fill the position by virtue of normal job position, experience, and training. These assignments, when they occur, are made with the full knowledge that the individuals will be evaluated in their performance by Commonwealth Edison Controllers and NRC Evaluators. We plan to continue this practice when necessary and will continue to emphasize training as the primary but not sole purpose of pre exercise drills and the demonstration of capabilities as the primary but not sole purpose of exercises.

EXERCISE WEAKNESSES

1. The assembly siren was not sounded promptly after the Site Emergency declaration. Because of this and other factors, assembly/accountability was not accomplished within an adequate time period.

RESPONSE

LZP 1110-1 "Station Director (Acting Station Director) Implementing Procedure" is being revised to include the following note:

"The assembly siren must be sounded promptly after declaring a Site or General Emergency. Prior to announcing an assembly and sounding the assembly siren ensure that security preparations for the assembly have been completed (LZP1170-1 Atch. B)".

This note appears in the initial steps of paragraphs 3.d.1 and 3.e.1 of LZP 1110-1. The following note appears after paragraphs 3.d.9 and 3.e.11 of LZP 1110-1:

"Prior to ordering an evacuation, the assembly/accountability process must be completed."

To assure that emergency response personnel are not denied access to their duty locations, Security Post Instruction LPI-117 provides for the site access facility to be manned continuously during emergency activities. This Instruction had been prepared, but had not been implemented at the time of this exercise. These procedure changes will be completed by October 31, 1983.

2. Inadequate respiratory protection was provided to teams dispatched to plant areas where airborne activity was expected.

RESPONSE

Procedure LZP 1330-50 provides instructions for respiratory protective equipment use in an emergency. Personnel who may be assigned to Radiation Protection Supervision in the Operations Support Center (OSC) will be provided with refresher training on this procedure by October 14, 1983.

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3. Inplant teams did not adequately document survey results or utilize proper survey instruments for inplant surveys.

RESPONSE

Forms for the documentation of survey results have been placed in the OSC. Procedure LZP 1330-50 will be revised by October 14, 1983 to include requirements for the documentation of survey results.

Procedure LZP 1330-50 specifies precautions which are to be taken when using air ion chambers in noble gas fields. Retraining will be provided by October 14, 1983 for Radiation Chemistry personnel who supervise activities in the OSC with regards to these precautions.

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4. The Emergency Operations Facility (EOF) was not declared operational within one hour of the Site Emergency declaration.

#### RESPONSE

Activation of the EOF within one hour is a goal of the Commonwealth Edison Company. GSEP states that "It is reasonable to expect partial manning of the CCC or EOF within 60 minutes for the Site and General Emergencies." However, due to the diversity of residential patterns for support personnel, possible adverse weather conditions and possible road congestion, this time frame might be exceeded. This position is consistent with that of the NRC as stated in a letter dated October 26, 1981 from W. J. Dircks, NRC, to Dr. D. F. Knuth, KMC, Inc. in response to an industry emergency preparedness group inquiry on activation times.

Some of the delay in activation is attributable to lack of familiarity with the EOF and EOF equipment. This problem will be minimized as additional training on and use of the permanent EOF's proceeds.

The major problem was the failure of the Directors to communicate with the Recovery Manager regarding their readiness to accept emergency responsibilities. Another delay was imposed by the Recovery Manager who waited for the arrival of the Environmental Emergency Coordinator (EEC) before accepting control of the event. The Recovery Manager finally decided to activate without the Environmental Emergency Coordinator. It was decided that the Environs Director would function as the Environmental Emergency Coordinator until the designated EEC arrived.

The problem of activation is considered to be a training problem. At present Corporate Emergency Planning is working on a training program for Recovery Managers. A discussion of EOF activation will be incorporated into the training program. The discussion will include the following points:

- a. Minimum staff required before EOF should accept control of an event.
- b. Initial responsibilities of Directors in order to accomplish a smooth and timely turnover of control.
- c. Steps required to formalize the turnover of control.

In conjunction with the turnover of EOF control there was a problem associated with Environs Field Teams. The comment was made that "The EOF Environs Director did not assume responsibility from the TSC . . . for an additional hour and forty minutes after the EOF became operational."

There was a qualified Environs Director functioning with the field teams. The TSC was not burdened as the TSC Environs Director had in past exercises relocated to the EOF. Dresden Station and LaSalle Station EPIP's currently request that an Environs Director from the unaffected station report to the EOF. This allows the station's (LaSalle) Environs Director to remain in control of field teams and allows field teams to become operational much earlier in an event.

The Environs Director at the EOF assumes a monitoring role until the need for turnover is established and/or until proper turnover can be conducted. The EOF Environs Director waited until Environs Field Teams were fully operational and until a convenient point of turnover was reached. The EOF Environs Director chose to allow LaSalle Station's Environs Director to direct the teams while the teams were still on-site. The EOF Environs Director took control of the Environs Teams before the teams were dispatched to off-site locations. It is our opinion that judicious choice of the turnover time is important.

5. Several EOF exercise participants were inadequately trained on computer terminals and associated programs which they had to utilize.

#### RESPONSE

Commonwealth Edison has conducted three exercises in 1983 and five exercises in the past twelve months. We have demonstrated sufficient depth of personnel to rotate participants through these exercises. In order to make full use of exercise experience, there are a limited number of new personnel added as staff to each exercise.

It is significant that the inexperience was on the staff level and not on the director or manager level.

In the case of the LaSalle Exercise, the inexperienced individual was a Byron observer who had been drafted to fill a position, that due to late changes, could not be filled in sufficient time for the exercise. The individual had received only limited instruction during the pre-exercise drill.

The Controller, being aware of the participant's plight, may have intervened too early. However, the Scenario contains a section on Control/Critique Techniques which states: "Controllers will provide verbal guidance to participants to keep the exercise oriented to the prearranged scope and scenario." The ability of the individual to function was critical to the exercise at that point.

The Chief Controller did act to stop the intervention by the Controller. The Controller has been cautioned not to aid participants in the future. The Control/Critique Techniques will be reviewed and emphasized in future controller meetings.

6. Status Board design and utilization were inadequate in the EOF. There was no apparent mechanism for transferring status board information onto hardcopy records for distribution to the EOF staff.

RESPONSE

There was clerical staff available that could have transferred status board information onto hardcopy records for distribution. However, these personnel were never directed to perform this function. They should have received direction from the Administration and Logistics Manager. This problem will be addressed by our Recovery Group Training Program currently under development by Corporate Emergency Planning and Production Training.

In addition, new status boards have been developed for use during the Dresden Exercise on September 14, 1983. Subsequent to this exercise their usefulness for future use at emergency response facilities will be evaluated.

Additional Concern

Individual directors maintained records of their activities in different ways. Some used notepads, while others utilized spiral notebooks or loose-leaf paper. By the end of the exercise, it was evident that these records were generally sloppy, disorganized and, in some cases, practically nonexistent. Log books should be provided for all EOF directors. Proper record keeping by directors will help reduce confusion during shift turnovers. This is an Open Item (50-373/83-27-07; 50-374/83-27-07).

RESPONSE

CECo has developed a logbook for CEC/EOF/TSC GSEP Directors. This log will be tested at Dresden and if evaluation is positive the concept will be extended to all EOFs and TSCs. Also CECO has developed a draft policy with respect to GSEP Event/Drill/Exercise record keeping. Once comments are received and evaluated the policy will be placed in effect before the end of 1983.