



**Commonwealth Edison**

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March 15, 1985

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Braidwood Station Units 1 & 2  
Annex to GSEP  
NRC Docket Nos. 50-456/457

Reference (a): D. H. Smith Letter to H. R. Denton dated  
January 21, 1985

Dear Mr. Denton:

Reference (a) provided a copy of the Braidwood Annex to the Commonwealth Edison Generating Stations Emergency Plan (GSEP) for your review. Subsequently, a comparison with Rev. 1 of the Byron Annex revealed some differences. We intend to keep the two annexes as alike as possible and consequently, will address these inconsistencies when Rev. 1 of the Braidwood Annex is issued around October, 1985. To assist in NRC Staff Review of this Annex, the attachment is included which lists the inconsistencies and their resolution.

Please address any comments or concerns that you or your staff may have regarding this matter to this office.

One (1) signed original and fifteen (15) copies of this letter with attachment are provided for your use.

Very truly yours,

David H. Smith  
Nuclear Licensing Administrator

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DHS/klj

cc: Monte P. Phillips-RIII  
Thomas J. Ploski-RIII  
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ATTACHMENT

PAGE

BWA 4-4  
Section 4.2  
Number 4)

COMMENT

The following line is missing from the text.  
"ESDA pledges support of all State of Illinois"

RESPONSE

Braidwood's Annex will be changed inserting the above sentence:

"The Emergency Services and Disaster Agency (ESDA) on the State, County, and municipal levels will implement protective actions for the public. NOTE: The agreement with the Illinois ESDA pledges support of all State of Illinois agencies that have a role in the Illinois Plan for Radiological Accidents."

BWA 4-4  
Section 4-2  
Number 6)

COMMENT

There is a difference in the discussion of INPO between the Braidwood and Byron Annexes.

RESPONSE

Braidwood's Annex will read the same as Byron's

"6) The Institute of Nuclear Power Operations (INPO) has coordinated a voluntary assistance program whereby participating utilities will provide assistance in response to a nuclear materials transportation accident. INPO also can provide emergency equipment and manpower."

PAGE

BWA 4.4  
Section 4-2  
Number 1)

COMMENT

Byron's Annex now includes bioassay as a service of Teledyne Isotopes.

RESPONSE

Braidwood's Annex will also include bioassay as a service of Teledyne Isotopes.

COMMENT

BWA 5-1  
Paragraph 2

Byron's Annex specifies that Table BYA 5-1 includes the specific initiating conditions for the first five emergency classes at the Station.

RESPONSE

Braidwood's Annex will read similar to Byron's.

"Table BWA 5-1 includes the specific initiating condition for the first five (5) emergency classes at Braidwood Station."

COMMENT

BWA 6-1  
Section 6.1

There is a discrepancy on the transmission of the NARS form between the Annexes and the Generic GSEP. The NARS form is no longer transmitted first to the System Power Dispatcher and then to the State. The NARS form is now directly transmitted to the State.

RESPONSE

The change in the notification scheme was done in Rev. 4a of the Generic GSEP. These sections in the Annexes will be changed to reflect what will be in Rev 5 of the Generic GSEP.

1015A/2/wjm

BWA 6-1

COMMENT

The text "initiating condition classified as a General Emergency" is missing from the fourth sentence.

RESPONSE

The sentence will be changed to read:

"For the initiating condition classified as a General Emergency, the Station Director is responsible for notifying the following Illinois Agencies of the emergency condition, as well as recommending initial protective actions for the offsite public."

BWA 6-1  
and  
BWA 6-2

COMMENT

In the Byron Annex, the Wisconsin Division of Emergency Government (DEG) is discussed in a number of sections. The Byron Annex requires the Division of Emergency Government to be notified directly of emergency conditions by the Station. Since Wisconsin (Byron) and Indiana (Braidwood) are outside the 10 mile EPZ, but inside the 50 mile ingestion EPZ, does this require the Braidwood Annex to include a discussion on the notification of Indiana?

RESPONSE

There is an agreement between Illinois ESDA and the Indiana Department of Civil Defense and Emergency Management for the notification of Indiana in the case where the 50 mile ingestion EPZ is impacted. Also, Illinois ESDA and Wisconsin Department of Emergency Government have an agreement for Zion Station. At present however, Illinois ESDA and

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BWA 6-1 &

BWA 6-2 (cont'd)

RESPONSE (cont'd)

Wisconsin Department of Emergency Government do not have an agreement for Byron Station. There is a potential for a similar agreement to be developed for Byron Station. If such an agreement can be negotiated, the Byron Annex would be revised to reflect these changes. Therefore, this section of the Braidwood Annex will stay as currently written.

BWA 6-3

COMMENT

There is a difference in the description of the Prompt Notification Systems between the two Annexes.

RESPONSE

The Braidwood Annex will be changed to read as the Byron Annex.

"This Prompt Public Notification System consists of a permanently installed outdoor notification system within the zero (0) to ten (10) mile radius around the Station. The zero (0) to ten (10) mile radius around the Station is primarily an agricultural area with a population density below 2000 persons per square mile. The Prompt Notification System as installed consists of mechanical and electronic sirens which will cover this entire area with a minimum sound level of 60 db. Additionally, for heavily populated areas within the zero (0) to ten (10) mile radius around the station which contain several communities, the Prompt Notification System will cover these communities with a minimum sound level of 70 db to ensure complete coverage."



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BWA 6-4  
Section 6.4

COMMENT

In the third sentence, the Braidwood Annex states "Station GSEP Directors initially report to the On-site Operational Support Center." It should read "report to the Technical Support Center"

RESPONSE

That sentence in Rev. 1 of the Braidwood Annex will be changed to read:

"Station GSEP Directors report to the Technical Support Center."

COMMENT

BWA 7-2  
Section 7.1.5

In the second sentence, the Annex states, "The EOF will be located...." It should be changed to "is located."

RESPONSE

That sentence in Rev. 1 of the Braidwood Annex will be changed to read:

"The EOF is located....."

BWA 7-3  
Section 7.2  
Number 2) and  
Number 7)

COMMENT

There is a difference in the location of the microwave voice channel and the radio voice channel between the two Annexes. The Byron Annex has the microwave and radio channels located in the Control Room.

RESPONSE

Change the Braidwood Annex to read as the Byron Annex:

"2) A microwave voice channel between the CCC and the Control Room, the TSC and the EOF."

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BWA 7-3  
Section 7.2  
Number 2) and  
Number 7)  
(cont'd)

RESPONSE (cont'd)

There is a difference in the "7) A radio voice channel between the CCC, the Control Room, the TSC, the EOF, mobile vehicles and handi-talkies in the field."

COMMENT

BWA 7-12  
Part b)

Does the HRSS liquid sampling panel have steel or lead shielding under the concrete shielding?

RESPONSE

The HRSS liquid sampling panel has lead shielding under the concrete shielding. The Braidwood Annex will be changed to read as follows:

"b) Concrete shielding above, below, and around the sides of the panel to prevent radiation from scattering around the lead shielding."

BWA 7-13  
Part d)

The Byron Annex does not discuss a special cart for the transport of a containment air sample. Should the Braidwood Annex also delete the discussion of the cart?

RESPONSE

At the present time, Braidwood Station expects to have the cart available for both liquid samples and containment air samples.

BWA 7-14  
Section 7.3.3.3

COMMENT

In the Byron Annex, "operating only at high range" has been deleted from the third sentence. Should it also be removed from the Braidwood Annex?

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BWA 7-14  
Section 7.3.3.3

RESPONSE

That portion of the sentence will also be removed from the Braidwood Annex.

"The monitor includes the following: two isokinetic nozzles, one for normal conditions operating at 2 ft<sup>3</sup>/min and one for high range conditions operating at 0.06 ft<sup>3</sup>/min; sampling rack; sample conditioner to filter out large concentrations of radioiodine and particulates; and the wide-range..."

BWA 7-15  
Section 7.3.3.3

COMMENT

There are differences between the two Annexes in the type, number and range in the General Atomic Company main steamline radiation detectors. Also, the Braidwood Annex indicates that "Readouts in the Control Room will include strip chart recorders."

RESPONSE

The paragraph will be changed to read the same as the Byron Annex:

"Two General Atomic Company RD-1 detectors will be provided for each of the four main steamlines upstream of the safety and relief valves. The range of the monitor is 10<sup>-1</sup>mR/hr to 1C<sup>4</sup>mR/hr." Also, "Readouts in the Control Room will include strip chart recorders." will be deleted.



PAGE  
BWA 7-22  
Section 7.5

COMMENT

In the Braidwood Annex, the first-aid/decontamination room includes "a portable leaded glass shield." This is not included in the Byron Annex.

RESPONSE

The Braidwood Annex will read the same as Byron's Annex:

"This room is provided with a sink, a shower, and a supply cabinet."

BWA 8-2  
Paragraph 3

COMMENT

The Braidwood Annex has not been revised to indicate the change in the responsible CECo Departments for dissemination of information.

BWA 8-2  
Paragraph 3

RESPONSE

The "Commonwealth Public Affairs Department" will be changed to "Communications Services Department."

Also, "The Commonwealth News Information Department" will be changed to "Communications Services Department."

COMMENT

Throughout the Braidwood Annex, there are references to On-site TSC and On-site OSC. The On-site should be dropped so that it will agree with the Byron Annex.

RESPONSE

In Rev. 1 of the Braidwood Annex, the "On-site" in "On-site TSC and On-site OSC" will be deleted.

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