



Commonwealth Edison
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May 20, 1986

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

Subject: Response to Supplemental Safety Evaluation Report
Concerning Emergency Planning for Braidwood
Station, Units 1 and 2
NRC Docket Nos. 50-455, 50-456, and 50-457

Reference: (a) March 4, 1986 V.S. Noonan letter to D.L. Farrar
(b) October 23, 1985 B.J. Youngblood
letter to D.L. Farrar

Dear Mr. Denton:

This letter is in response to the open findings of the Supplemental Safety Evaluation Report concerning Emergency Planning for Braidwood Station. The associated responses to these findings are as follows:

ITEM 1

A formal letter of agreement should be executed between CECO and the U.S. Coast Guard which would specify the support to be provided by that organization in response to an emergency condition at the Braidwood Station.

Response:

A review of the needs of Braidwood Station has determined that assistance of the U.S. Coast Guard could be required on the Kankakee River. However, Revision 5 to Generic GSEP does not require letters of agreement with Federal agencies who are legally required to respond based on Federal law. Any response that may be requested of the Coast Guard would not be outside of assistance normally provided by that agency.

ITEM 2

The plan should specify those individuals in the onsite and offsite emergency organizations who have the undelegatable authority to authorize emergency worker exposures in excess of regulatory limits.

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Response

Revision 6 to Generic GSEP will designate the Acting Station Director/Station Director/CCC Director or Manager of Emergency Operations, whoever is in command and control, as the individual with the undelegatable authority to authorize emergency worker exposures in excess of regulatory limits. Whenever possible, prior consultation with the Commonwealth Edison Medical Department and/or the Station's Radiation Protection Supervisor will be sought before exposing individuals to dose equivalents beyond 10 CFR 20 limits. Revision 6 is expected to be submitted for NRC review and approval in June 1986.

ITEM 3

The Station's Emergency Action Levels (EALs) need to be modified as indicated in this SER.

Response

The current logic in the Braidwood emergency action levels is consistent with that at the other Commonwealth Edison nuclear stations. The rationale used in classification is that although the same apparent degradation has occurred in Condition 1, 4, and 5 as in Condition 14, the cause behind Conditions 1, 4, and 5 has the potential for even greater damage than that described by the EAL and therefore requires an increased response on the part of the GSEP organization. No interim changes are proposed and no further action is deemed appropriate at this time. EAL #27 in the Braidwood Annex will be modified to be consistent with the wording currently existing in the Byron Annex. This revision will be completed by July 1986.

ITEM 4

A followup message form and provisions for periodically transmitting adequate followup messages to State and local authorities should be developed.

Response

Although a formal message form does not exist, current emergency plan implementing procedures provide detailed instructions on what and how followup information is to be provided to the State authorities. These procedures have proven adequate during recent Commonwealth Edison exercises. No further action is deemed appropriate at this time.

ITEM 5

The evacuation time estimate study for the Braidwood Station's plume exposure EPZ should be modified as indicated in this SER.

Response

The complete evacuation time estimate information for the plume exposure EPZ was submitted to the NRC on February 5, 1986. Commonwealth Edison is currently awaiting the results of the NRC staff review.

ITEM 6

A letter of commitment to compliance with the Interim Guidance contained in the Commission Statement of Policy on Emergency Planning Standard 10 CFR 50.47(b)(12) is required for licensing above 5% rated power.

Response

By the time the Full Power License is required Commonwealth Edison will have meet the requirements of 10 CFR 50.47(b)(12) as interpreted by the Commission before the GUARD decision. Commonwealth Edison commits to full compliance with the Commission's response to the GUARD remand in its final form but maintains its right to challenge the Commissions "FINAL RULE".

ITEM 7

Indicate in the Plan that communications drills between the Braidwood Station and the appropriate emergency response organization(s) in Indiana will take place quarterly.

Response

This subject was addressed in a letter from Nuclear Licensing Administrator to H.R. Denton, dated March 15, 1985. There is an agreement between Illinois 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. Standard Operating Procedures supporting the Illinois Plan Radiological Accidents contain detailed steps for these notifications. IPRA-IDNS Standard Operating Procedure 2-SOP-3, dated 11/85, Page 8, entitled "Notification of Federal and State Support Agencies and Contiguous States", provides specific names and telephone numbers for making such notification. In addition, IPRA Volume I, Chapter 10, Section A, Page 2 states "Quarterly communications drills are to be held with the Federal emergency response organizations and states within the ingestion exposure pathway EPZ." No further action is deemed appropriate at this time.

ITEM 8

Indicate in the Plan that construction and other contractor personnel, who would not have duties in the onsite emergency organization, would receive an initial orientation and annual retraining on the Plan and relevant procedures sufficient to ensure that they are aware of actions they should take during an emergency.

Response

Construction and contractor personnel whose normal work takes them inside the protected area are required to complete the NGET training program which includes emergency response training. NGET is required on an annual basis.

All contractor and construction personnel receive written instructions of what to do in an emergency. Receipt of information is documented. The initial Braidwood distribution of instructions will coincide with the implementation of the security program, thereafter, instructions will be issued on an annual basis. Additionally, copies of the Braidwood Emergency Information Booklets shall be kept at the Security Gate Houses and are available upon request.

ITEM 9

Indicate in the Plan that the scope of independent audits of station's emergency preparedness program will be in accordance with the requirements of 10 CFR 50.54(t). Also, indicate in the Plan that portions of such audits that address the adequacy of the Station's interface with State and local governmental organizations will be made available for review by these organizations, per the aforementioned regulatory requirement.

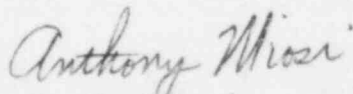
Response

Revision 5, Section 8.1.6 of Generic GSEP indicates that the scope of independent audits will be in accordance with the requirements of 10 CFR 50.54(t). The availability of audit results as relates to Commonwealth Edison's interface with State and local governmental organizations will be addressed in Revision 6. Revision 6 is expected to be submitted for NRC approval in June, 1986.

Please direct any questions you may have regarding this matter to this office.

One signed original and fifteen copies of this letter are provided for your review.

Very truly yours,



A. D. Miosi
Nuclear Licensing Administrator

/klj
cc: J. Stevens (NRC)
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