



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690 - 0767

June 30, 1986

Mr. James G. Keppler
Regional Administrator
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Byron Station Units 1 and 2
IE Inspection Report Nos.
50-454/86-013 and 50-455/86-011
NRC Docket Nos. 50-454 and 50-455

Reference (a): May 15, 1986 letter from W. D. Shafer
to Cordell Reed

Dear Mr. Keppler:

Reference (a) provided the results of an inspection by Mr. Patterson, Ms. Smith and others of your office on April 29 through May 2, 1986. During this inspection of the Byron Station emergency preparedness exercise, two exercise weaknesses were identified. Attachment A to this letter contains Commonwealth Edison's response to the exercise weaknesses appended to reference (a).

Please direct any questions regarding this matter to this office.

Very truly yours,

K. A. Ainger
Nuclear Licensing Administrator

lm

Attachment

cc: Byron Resident Inspector

B607140128 860630
PDR ADOCK 05000454
Q PDR

1828K

JUL 1 1986

IE35

1/1

ATTACHMENT A

EXERCISE WEAKNESS #1

The NRC was not notified within one hour after the Site Area Emergency was declared as required by 10 CFR 50.72(a)(3). This notification was not initiated until four hours and 47 minutes after the declaration Site Area Emergency.

In addition, the NRC was not notified of any major change of emergency events throughout the exercise. These omissions included an uncontrolled release of radioactivity and issuance of two protective action recommendations (PARs).

RESPONSE

We believe the above observation resulted from confusion between us and the NRC duty officer in the level of his participation in this GSEP exercise.

As noted in the inspection report, Objective 2.b states "Demonstrate the capability to notify the NRC within one hour of the initial incident". Initially, upon declaration of the exercise alert, the NRC was properly notified via the ENS. This notification did satisfy exercise objective 2.b which was previously agreed upon by the NRC. During the initial notification, we communicated to the NRC duty officer that we were in a GSEP exercise and our next notification will be when the exercise is over. The intent of this message was to inform him not to expect notifications as the exercise progressed. We thought it would be prudent not to tie up the ENS line with exercise message traffic. A lack of comments or objections by the duty officer indicated concurrence to us.

Nonetheless, to eliminate possible confusion in future GSEP exercises, we will revise Byron Station Procedures BZP 100-T1 "Station Director - Checklist of Initial GSEP Responsibilities" and BZP 310-1 "Initial Notifications and GSEP Responses" to clarify the Station Director's responsibilities in contacting the NRC during GSEP exercises. The clarification will ensure that all required notifications will be made during GSEP exercises. These procedure revisions will be emphasized in the periodic GSEP training program. In addition, future exercise ground rules and objectives will be written to clarify how to satisfy notification requirements.

The procedure revisions discussed above will be completed by July 17, 1986.

EXERCISE WEAKNESS #2

The Emergency Operations Facility (EOF) did not consider evacuation time estimates when making the second and final PAR for the public within the 10 mile Emergency Planning Zone (EPZ). This was contrary to Emergency Implementing Procedure BZP 300-AZ, Recommended Protective Actions for Actual or Imminent Gaseous Release Conditions.

Also, this PAR was issued approximately eight minutes after an uncontrolled release took place at 1400 and included 0-2 mile radius evacuation. This recommendation could have endangered residents who would have been evacuated through the plume.

RESPONSE:

Cognizant GSEP personnel responsible for making protective action recommendations will be reminded during training that the evacuation time estimates should be considered when determining which protective action recommendation to make to offsite governmental officials. This training will be completed by December 31, 1986.

Additionally, to expedite the evaluation of protective action response options, we are currently developing a computer program version of ED-24, "Determining the Recommended Offsite Protective Action Response Option", which includes consideration of evacuation time estimates. The computer program version of ED-24 is scheduled to be operational by June 30, 1987. Once this version of ED-24 is available, it should expedite the evaluation of protective action response options in order to provide timely protective action recommendations to offsite governmental officials within the 15 minute interval required by the regulations.

It is important to note, however, that the final determination on the advisability of any protective action recommendation lies with the offsite governmental officials. This is because these governmental officials have direct access to the key, non-plant related factors necessary to finalize any protective action recommendation such as EPZ population distributions, transportation availability, special facility requirements and roadway conditions and availability.