JUL 22 1986

Docket No. 50-456 Docket No. 50-457

Commonwealth Edison Company ATTN: Mr. Cordell Reed Vice President Post Office Box 767 Chicago, IL 60690

Gentlemen:

SUBJECT: Emergency Preparedness Appraisal

To verify that applicants have attained an adequate state of onsite emergency preparedness as required by 10 CFR 50.47(a)(1), the NRC conducts special preoperational appraisals of their emergency preparedness programs. The objectives of the appraisal are to evaluate the overall adequacy and effectiveness of emergency preparedness and to identify areas of weakness that need to be strengthened.

During the period May 29 through June 13, 1986, the NRC conducted a special appraisal of the state of onsite emergency preparedness at the Braidwood Nuclear Generating Station, Units 1 and 2, authorized by NRC Construction Permits No. CPPR-132 and No. CPPR-133. Areas examined during this appraisal are described in the enclosed report (50-456/86021; 50-457/86019). Within these areas, the appraisal team reviewed selected procedures and representative records, inspected emergency facilities and equipment, observed work practices, and interviewed personnel.

The findings of this appraisal indicated that a number of areas of your emergency preparedness program were not complete at the time of this appraisal. These areas included, among others, installation and calibration of certain equipment, related procedural development and training, procedure updates, completion of training for certain emergency response personnel, and demonstration of shift augmentation and assembly/accountability. These items are identified as Open Items and are listed in the enclosed Appendix A.

The findings also indicate that there are items in your emergency preparedness program which need improvement. These items are listed in the enclosed Appendix B. These improvements are areas which, based on professional judgement, we feel should be corrected.

You are requested to submit a written statement within thirty days of the date of this letter, describing your planned actions for completing each of the items identified in Appendix A, and the results of your consideration of each of the items in Appendix B. Most of the Open Items must be adequately addressed prior to licensing. These items have been specifically identified in Appendix A.

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In accordance with 10 CFR 2.790(a) a copy of this letter and the enclosures will be placed in the NRC Public Document Room.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

We will gladly discuss any questions you have concerning this appraisal.

Sincerely.

"Original signed by W.D. Shafanw

W. D. Shafer, Chief Emergency Preparedness and Radiological Safety Branch

Enclosures:

- 1. Appendix A, Appraisal Open Items
- 2. Appendix B, Appraisal Improvement Items
- 3. Inspection Reports No. 50-456/86021(DRSS); No. 50-457/86019(DRSS)

cc w/enclosures:

- D. L. Farrar, Director of Nuclear Licensing
- M. Wallace, Project Manager
- D. Shamblin, Construction Superintendent
- E. E. Fitzpatrick, Station Superintendent
- C. W. Schroeder, Services Superintendent
- P. L. Barnes, Regulatory Assurance Supervisor DCS/RSB (RIDS)
- Licensing Fee Management Branch

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Appendix A - Open Items

The following is a list of Open Items identified in the area of emergency preparedness which must be completed prior to fuel load, initial criticality, full power authorization, or in accordance with the schedules set forth in your NUREG-0737 correspondence and confirmed in the Safety Evaluation Report and Supplements:

- Prior to Fuel Load, there must be at least three persons identified for all onsite emergency organization positions. (456/86021-01; 457/86019-01) (Section 2.1)
- Prior to Fuel Load, the applicant must conduct a successful off-hours augmentation drill of the onsite emergency organization. (456/86021-02; 457/86019-02) (Section 2.2.1)
- Prior to Fuel Load, the applicant must re-evaluate the Shift Foreman's multiple emergency assignments to ensure manning requirements are met during fires and/or other GSEP events which may warrant OSC activation. (456/86021-03; 457/86019-03) (Section 2.2.1)
- 4. Prior to Fuel Load, the GSEP Telephone Directory must be revised to include a priority notification scheme for members of the off-site emergency organization who would report to the Mazon EOF following an appropriate emergency declaration at the Braidwood Station. (456/86021-04; 457/86019-04) (Section 2.2.2)
- 5. Prior to Fuel Load, the applicant must complete the following tasks: implement and complete the GSEP testing program for Station Group Directors; establish and implement a required reading program for all members of the onsite emergency organization; establish a training method for non-licensee emergency augmentation personnel; establish and implement the Braidwood GSEP instructor selection/qualification program; and establish and implement the "Station Emergency Plan Training" program. (456/86021-05; 457/86019-05) (Section 3.1)
- Prior to Fuel Load, the applicant must complete all initial GSEP training requirements for all members of the onsite emergency organization. (456/86021-06; 457/86019-06) (Section 3.2)
- Prior to Fuel Load, the applicant must create within the GSEP Training Program an integrated training section that provides CR personnel an opportunity to simultaneously practice both Reactor Plant Procedures for off-normal events and the GSEP Procedures. (456/86021-07; 457/86019-07) (Section 3.2)
- 8. Prior to Fuel Load, the Control Room must be completed. Specifically, the following items must be installed and operational: the ODCS A-model; Unit 1 SPDS; the RM-11 system; readouts from the Fire Detection System; digital and analog readouts of onsite meteorological measurements; the emergency ventilation system; the access control system; and readouts from the Seismic Monitoring System. (456/86021-08; 457/86019-08) (Section 4.1.1.1)

- 9. Prior to Fuel Load, the TSC must be completed. Specifically, the following items must be installed and operational: entry foyer portal monitors and decontamination facilities; microfiche printer/reader; emergency ventilation system and associated continuous air monitor; SPDS displays for Unit 1; a procedure for operation of the ventilation system, including operator action in the event of a CAM alarm; Point History/ Point Trend computer software; and a copy of the approved Technical Specifications. (456/86021-09; 457/86019-09) (Section 4.1.1.2)
- 10. Prior to exceeding five percent rated power, the EOF must be completed. Specifically, the following must be completed: handling logistics and analysis of field monitoring samples at the EOF must be proceduralized and consistent with the emergency plan; a roster of trained individuals must be developed for the logistics and analysis of field monitoring samples at the EOF; and a copy of the approved Braidwood Technical Specifications must be available in the EOF. (456/86021-10; 457/86019-10) (Section 4.1.1.4)
- 11. Prior to exceeding five percent rated power, the CCC must be provided with the following items: a copy of the approved Braidwood Station Technical Specifications; a reference manual of computer point identifiers for the Point Trend and Point History programs relevant to the Braidwood Station; and copies of appropriate Braidwood Station layout, P&IDs and electrical systems diagrams. (456/86021-11; 457/86019-11) (Section 4.1.1.5)
- 12. Prior to Fuel Load, the applicant must satisfactorily demonstrate the use of the HRSS for primary coolant sampling under simulated accident conditions. (456/86021-12; 457/86019-12) (Section 4.1.1.6)
- Prior to Fuel Load, the applicant must satisfactorily demonstrate the use of the Containment Air Sampling Panel under simulated accident conditions. (456/86021-13; 457/86019-13) (Section 4.1.1.7)
- 14. Prior to Fuel Load, the applicant must complete installation of: route designations delineating directions to all onsite assembly areas; emergency lighting for each of the three assembly areas intended for nonessential personnel; and card readers in the onsite assembly areas. (456/86021-14; 457/86019-14) (Section 4.1.2.1)
- 15. Prior to Fuel Load, the medical treatment and decontamination facilities located on the 426 foot level of the auxiliary building must be completed, including installation of associated medical, decontamination, and communications equipment. (456/86021-15; 457/86019-15) (Section 4.1.2.2)
- 16. Prior to Fuel Load, the ambulance emergency kit must be positioned in the guardhouse, as stated in BwZP500-8. All first aid kits and stretchers must also be positioned in predesignated inplant locations period to Fuel Load. (456/86021-16; 457/86019-16) (Section 4.2.1.1)

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- Prior to Fuel Load, the applicant must provide an approved means of determining containment humidity such that an emergency condition would be classifiable per the humidity criteria in EAL Condition No. 24. (456/86021-17; 457/86019-17) (Section 4.2.1.3)
- Prior to Fuel Load, storage locations for protective clothing for emergency use must be determined, and the clothing must be in place. (456/86021-18; 457/86019-18) (Section 4.2.2)
- Prior to Fuel Load, the following must be installed and operational: the public address system and the assembly/evacuation/fire alarms. (456/86021-19;457/86019-19) (Section 4.2.3)
- 20. Prior to Fuel Load and in accordance with IE Bulletin 79-18, the applicant must develop and be ready to implement adequate interim measures for alerting personnel in high noise areas of a fire, assembly, evacuation, or local high radiation alarm. By the end of the first refueling outage, the applicant must have operable visual alarms for alerting persons in all identified high noise areas of such alarms. (456/86021-20; 457/86019-20) (Section 4.2.3)
- Following installation of the ENS equipment in the Control Room and TSC, the applicant must complete the actions specified in IE Bulletin 80-15. (456/86021-21; 457/86019-21) (Section 4.2.3)
- 22. Prior to exceeding five percent power, procedural provisions must be established for ensuring that the GSEP van can be dispatched from the Mazon EOF during normal and off-hours. Also, procedural guidance must be established for ensuring that suitable station vehicles would be identified for off-site survey team use should the GSEP van and/or Rad/Chem Department vehicle not be available. (456/86021-22; 457/86019-22) (Section 4.2.6)
- Prior to Fuel Load, the applicant must replace existing Figure 6.3-1 of BwZP 380-4 with a legible copy of this figure. (456/86021-23; 457/86019-23) (Section 5.1)
- 24. Prior to Fuel Load, the following inconsistences and discrepancies in the EALs must be corrected:
 - a. The wording of the Alert EAL for Condition 2 must be revised to include the words "and control is established from local control stations within 15 minutes."
 - b. The wording of the General Emergency EAL for Condition 16 must be revised to repeat the wording currently for Site Emergency, as well as the existing words under General Emergency, in order that the General Emergency EAL will stand alone.

- c. The applicant must re-evaluate EAL Condition 24 in light of a primary to secondary LOCA and an accompanying unisolable steam leak outside containment, which equates to two fission product barriers breached. The review should be directed at whether the use of existing EALs will result in a correct classification.
- d. The applicant must resolve the apparant disparity in feedwater temperatures between the Braidwood EAL Condition 21 For an Unusual Event and the corresponding Byron EAL. (456/86021-24; 457/86019-24) Section 5.1)
- 25. Prior to Fuel Load, the applicant must include the responsibility for requesting federal assistance, and the responsibility for authorizing emergency worker radiation exposures for vital equipment protection and saving of life to the list of non-delegable responsibilities of the Acting Station Director and Station Director in the appropriate BwZPs. (456/86021-25; 457/86019-25) (Section 5.3)
- Prior to Fuel Load, the applicant must revise those BwZPs where reference to NRC notifications occurs to correctly reflect the current wording of 10 CFR 50.72(a)(3). (456/86021-26; 457/86019-26) (Section 5.3)
- 27. Prior to exceeding five percent power, the applicant must ensure that Control Room procedures yielding off-site PARs are in place and appropriate personnel are trained on the procedures so that all radiological accidents including unmonitored releases and/or the unavailability of specific instrumentation (e.g., containment radiation levels) are covered. (456/86021-27; 457/86019-27) (Section 5.4.2)
- 28. Prior to Fuel Load, the applicant must position the analytical counting equipment at its designated location on the 401 foot level of the Turbine Building to serve as a backup counting facility. Appropriate personnel must also have completed training on the use of the facility's equipment. (456/86021-28; 457/86019-28) (Section 5.4.2.2)
- Prior to Fuel Load, the applicant must complete operator hands-on training on the seismic monitoring system. (456/86021-29; 457/86019-29) (Section 5.4.2.3)
- Prior to Fuel Load, the applicant must complete operator hands-on training on the fire monitoring system. (456/86021-30; 457/86019-30) (Section 5.4.2.4)
- 31. Prior to Fuel Load, the applicant must revise appropriate BwZPs to include guidance regarding hazards which may exist and may warrant continued sheltering of nonessential onsite personnel in lieu of their evacuation following completion of assembly/accountability activities. (456/86021-31; 457/86019-31) (Section 5.4.3.1)

- 32. Prior to Fuel Load, the applicant must conduct a successful onsite assembly and accountability drill involving a total number of applicant, contractor, and construction personnel as may be expected onsite during a refueling outage. (456/86021-32; 457/86019-32) (Section 5.4.3.2)
- Prior to Fuel Load, the applicant must develop procedural guidance to address the means of maintaining accountability once it has been established. (456/86021-33; 457/86019-33) (Section 5.4.3.2)
- 34. Prior to exceeding five percent power, the applicant must complete development of and any associated training on the "Communication Services Plan." (456/86021-34; 457/86019-34) (Section 5.4.6)
- 35. Unless otherwise directed by the ASLB, the next edition of the Braidwood Public Information Brochure must be distributed by April 30, 1987. (456/86021-35; 457/86019-35) (Section 6.2.1)
- 36. Prior to exceeding five percent power, the prompt notification (siren) system for the 10-mile EPZ must be fully operational, including completion of training by all persons responsible for system activation. (456/86021-36; 457/86019-36) (Section 6.2.2)
- 37. Prior to Fuel Load, additional emergency preparedness training must be completed by all Shift Engineers, Shift Foremen, and Station Control Room Engineers, with emphasis on the following: identification of Control Room shift personnel and completion of integrated training for each shift requiring the concurrent use of reactor plant procedures and EPIPs; understanding which emergency response facilities must be activated for each emergency class; understanding of off-site evacuation time estimate data in making PAR decisions; familiarity with the guidance provided in NRC Information Notice IN 85-78; and the ability of all persons who could become Acting Station Director to correctly classify emergencies. (456/86021-37; 457/86019-37) (Section 7.2.1)
- 38. Prior to Fuel Load, the applicant must complete remedial training on general and position-specific aspects of the Station's emergency preparedness program for the following types of Station Group directors: Station, Operations, Technical, and Maintenance Directors. (456/86021-38; 457/86019-38) (Section 7.2.2)

Appendix B - Improvement Items

Based on the results of the NRC's appraisal of the Braidwood Nuclear Power Station emergency preparedness program conducted May 29 through June 13, 1986, the following items should be considered for improvement:

- The GSEP Surveillance Program should be developed and formally documented. (Section 1.3)
- Additional duties assigned to GSEP Coordinators should be relevant to the stations' emergency preparedness programs and should not be of an extent to prevent the Coordinators from adequately performing their principal duties. (Section 1.3)
- 3. There should be increased interaction between corporate emergency planning staff and the GSEP Coordinators on routine matters affecting the stations' programs, including pre-implementation review of corporate generated procedures that are also used at the stations. (Section 1.3)
- 4. The GSEP Coordinator's position description should include a minimum frequency for professional training opportunities. Job qualification requirements should include some knowledge of current, relevant regulatory requirements and guidance. (Section 1.4)
- 5. The procedural requirements of BwZP 500-9 should be completed prior to Fuel Load. (Section 2.1)
- The GSEP Assignment Form and/or GSEP Proficiency Forms, as contained in BwZP 500-9, should include provisions for the signature of the individual being assigned a position in the onsite emergency organization. (Section 2.1)
- 7. Applicant personnel, whose positions may be deleted from the offsite emergency organization in future GSEP revisions, should continue to receive annual overview training on the GSEP so they better understand the emergency response organization with which they may still have to interface. (Section 2.2.2)
- The applicant should conduct periodic, off-hours augmentation drills of its offsite emergency organization personnel who would respond to the CCC or to a station's EOF. (Section 2.2.2)
- The position-specific lesson plan/EPIP cross-reference matrix should be formalized. (Section 3.1)
- 10. The emergency worker dose limits for stopping a release, as stated in the Station Support Personnel lesson plan, should be corrected. (Section 3.1)

- 11. The information in the Control Room Operations Personnel lesson plan regarding use of the NARS code should be corrected. (Section 3.1)
- 12. The EPIP/GSEP director matrix should be incorporated in a formal training requirement. (Section 3.1)
- The applicant should provide for a security/access control point and/or a radiological check point at the 431 foot level access doors to the TSC. (Section 4.1.1.2)
- Step F.5 of BwZP 400-1 should be revised to specify numerical criteria for evacuation of the TSC. (Section 4.1.1.2)
- 15. BwZP 400-1 and 400-2 should be referenced in BwZP 100-8, the Rad/Chem Director Implementing Procedure. (Section 4.1.1.2)
- 16. The time notation (12 or 24 hour clock) to be used during TSC activation should be standardized and an appropriate wall-mounted clock should be installed. (Section 4.1.1.2)
- Copies of spare/repair parts availability and cross reference listings should be available in the TSC for use by the Maintenance and Stores Directors. (Section 4.1.1.2)
- A reference copy of CCC and EOF implementing procedures should be in the TSC. (Section 4.1.1.2)
- Composite system flow diagrams should be available in the TSC. (Section 4.1.1.2)
- 20. The 10 and 50 mile radius EPZ topographic maps should have A through R sector designations. (Section 4.1.1.2)
- 21. The applicant should provide an airborne concentration number in BwZP 400-2 as a part of the conditions to determine the OSC personnel shall be evacuated to a backup location. (Section 4.1.1.3)
- 22. The applicant should evaluate the availability of emergency supplies (such as respiratory equipment, protective clothing, portable lighting) which might be needed by nonessential personnel in onsite assembly areas. (Section 4.1.2.1)
- 23. The applicant should identify one or more additional plant exit routes that begin in directions other than to the north. All site evacuation routes should be depicted in the Braidwood Annex and also in implementing procedures BwZP 100-8, BwZP 300-5, and BwZP 300-6. (Section 4.1.2.1)
- 24. The applicant should continue evaluating the need for an alternate ENC to the Mazon facility and should coordinate this planning effort with appropriate State agencies. (Section 4.1.4)

- 25. Dresden Station personnel responsible for the St. Joseph Medical Center's emergency kit should routinely provide the Braidwood Station with copies of records of kit inventories and instrument checks, and should provide information on the kit's exact storage location. (Section 4.2.1.1)
- 26. Mazon EOF personnel responsible for the GSEP van and its contents should routinely provide the Braidwood Station with copies of inventory records for the van's equipment. (Section 4.2.1.1)
- 27. Procedure BwZP 500-3 should indicate the storage location of the environs kits used by field teams. (Section 4.2.1.1)
- 28. The applicant should ensure that appropriate ED-series procedures and Environs Director training materials address which nuclear stations' meteorological data may serve as representative backup data for characterizing another station's meteorological conditions. (Section 4.2.1.4)
- 29. Placards associated with analog strip chart recorders located in the Control Room should list the meteorological measurement levels for Braidwood, rather than the Byron Station. (Section 4.2.1.4)
- 30. Analog wind speed data available in the Control Room should be in the unit of measure utilized in dose assessment software and manual backup calculation procedures. (Section 4.2.1.4)
- 31. The applicant should develop a listing of damage control equipment, parts and supplies which may typically be needed for rapid and/or temporary repairs. The list could include quantities available at various storage locations in the plant. (Section 4.2.4)
- 32. The applicant should acquire or assemble several damage control tool kits or tool rolls. The contents should be determined by experience and judgement to include those items which might be needed by a team dispatched from the OSC. Such pre-assembled/pre-positioned kits should be readily available to OSC staff. (Section 4.2.4)
- 33. The applicant should develop a consolidated index for all BwZPs, to be placed at the front of the procedures binder. The pages of the index should be dated. The index should be updated whenever procedure revisions occur. (Section 5.1)
- 34. As BwZP procedures are revised, attention should be given to assuring that all pertinent references are cited in the body of the procedures at the applicable step(s), and that only cited references are included in the list of references. Additionally, all references cited in procedures used in the Control Room, TSC, OSC, EOF, or CCC should be available in those facilities. (Section 5.1)
- 35. The applicant should develop a detailed check-off list for use in conjunction with BwZP 380-1 for briefing and approving volunteers to exceed normal 10 CFR 20 dose limits in emergency situations to protect vital equipment or to save lives. (Section 5.1)

- 36. The next revision to 1BwOA-ELEC 5, Local Emergency Control of Safe Shutdown Equipment, should include the step referencing GSEP evaluation per BwZP 200-1. (Section 5.2)
- 37. In next revisions to applicable LCOARs, the wording of the statement contained as ACTION Step 1 in the LCOARs should be revised to state the correct title of "Station Director," rather than the incorrect "Station GSEP Director." The wording should also be revised to indicate that the Station Director would initiate, rather than evaluate, GSEP response activities. (Section 5.2)
- 38. The applicant should include procedural steps, where appropriate, in the Station Director and Acting Station Director implementing procedures to provide for a plant public address announcement after the declaration of an emergency. (Section 5.3)
- 39. The applicant should develop check-off lists for use by the Acting Station Director (Shift Engineer) in turning over to the Station Director, and for the Station Director in turnover or information exchange with the EOF Recovery Manager or the CCC Director. Similar check-off lists should be developed to facilitate shift relief for the various Station Group Directors. (Section 5.3)
- The applicant should develop an Acting Station Director check-off list as an Appendix to BwZP 100-12, to summarize those items for which he is responsible. (Section 5.3)
- 41. The applicant should review the BwZPs to ensure that appropriate procedure steps specify referenced procedures. (Section 5.4.2)
- 42. The applicant should develop procedural guidance to describe accident assessment staffs and their inter-relationships. (Section 5.4.2)
- 43. The applicant should include, in appropriate ED series procedures, the necessary computer passwords and instructions on when computer commands must be capitalized. Otherwise, such software restrictions should be eliminated. (Section 5.4.2)
- 44. The applicant should ensure that instrument readings used as inputs to dose assessment calculations have the same measurement units as those required by the dose assessment software. (Section 5.4.2)
- 45. The applicant should computerize offsite PAR guidance in the C Model. (Section 5.4.2)
- 46. Dose assessment printouts should include "flags" to indicate when any default input value was utilized. (Section 5.4.2)
- 47. The applicant should incorporate into appropriate implementing procedures directions on sounding the assembly/evacuation siren and making an announcement on the plant paging system. A prescripted message should be provided in the procedures for use when making this announcement. Section 5.4.3.1)

- 48. The applicant should insert references to pertinent personnel monitoring/ decontamination procedures as appropriate within the existing assembly/ accountability/evacuation procedures. (Section 5.4.3.1)
- 49. The applicant should periodically test the assembly/evacuation siren in order to familiarize onsite personnel with its sound. (Section 5.4.3.1)
- 50. The applicant should distribute the "Braidwood Site Accountability Guidelines" to all onsite applicant, contractor, and construction personnel prior to Fuel Load. Distribution records should be maintained so that the completeness of the distribution can be verified. (Section 5.4.3.1)
- 51. A separate Search and Rescue procedure should be prepared which addresses all aspects of the conduct of an onsite search and rescue operation, including: team leadership and composition, team briefing, debriefing, communications, and systematic search routes and methods. (Section 5.4.3.2)
- 52. Procedure EG-10 should be referenced in BwZP 300-5, BwZP 300-6, and BwRP 1470-1. (Section 5.4.3.3)
- 53. The applicant should provide a listing to Dresden Station personnel of all procedures, publications, and other materials desired to be taken to the Joliet Station by Dresden Station personnel, in the event that Joliet Station is selected as a reassembly area for Braidwood Station evacuees. (Section 5.4.3.3)
- 54. Form BwZP 380-3A1 should be revised to provide for recording the model and serial number of the survey instrument used, the instrument probe and conversion factor used, and the name and/or signature of the RCT performing the survey/decontamination. Instructions should be provided on the form, or in Procedure BwZP 380-3, for forwarding the completed form to the Station Health Physicist or to the Rad/Chem Director. (Section 5.4.3.3)
- 55. Form 1400-T1, Personnel External Contamination Record, should be revised to provide for recording both the survey instrument model and serial number and the instrument probe and conversion factor used. (Section 5.4.3.3)
- 56. Procedures BwRP 1470-1 and BwZP 380-3 should be revised to reference numerical values for contamination levels that require decontamination, as stated in BwRP 1480-1. (Section 5.4.3.3)
- 57. The requirements for handling and processing personnel contamination data collected during emergencies should be proceduralized. (Section 5.4.3.3)

- 58. The applicant should add information on first aid and rescue team composition to Procedures BwZP 100-2 and 100-8. (Section 5.4.3.4)
- 59. The applicant should include a precautionary statement in BwZP 380-1 to consider the needs for extremity exposure monitoring and multiple whole body exposure monitoring for search and rescue team members. (Section 5.4.3.4)
- 60. The applicant should add instructions to BwZP 380-3 to require that pocket dosimeters either be zeroed or the initial reading recorded prior to issue to emergency response personnel. (Section 5.4.3.4)
- 61. The BwRP procedure volume index should be corrected regarding the Medical and TLD program procedure sets. (Section 5.4.3.4)
- 62. The OSC Director duties listed in BwZP 100-10A1 should include additional guidance on the content of team briefings and debriefings for repair and corrective action activities. (Section 5.4.4)
- 63. The applicant should identify, in procedures requiring periodic review/ update, the title of the person responsible for performing the review/update. (Section 5.5.3)
- 64. The applicant should implement additional administrative measures to ensure that Call Supervisors keep their current call-out lists readily available when offsite. (Section 7.2.2)

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