POLICY ISSUE
(Notation Vote)

February 27, 2002 SECY-02-0033

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: AMERGEN'S REQUEST TO CONSOLIDATE THE CLINTON POWER STATION EMERGENCY OPERATIONS FACILITY (EOF) INTO THE CENTRALIZED EOF OPERATED BY EXELON GENERATION CO.

PURPOSE:

To obtain the Commission's approval of the proposal of AmerGen Energy Company, LLC (AmerGen), to integrate the Clinton Power Station (CPS) emergency operations facility (EOF) into the centralized EOF operated by Exelon Generation Co., LLC (EGC).

BACKGROUND:

Industry Trends

In the past 3 years, a major consolidation has occurred in the electric generating industry in Illinois. PECO Energy Company and British Energy, Inc., formed a new company called AmerGen with each partner owning 50 percent. The NRC approved the transfer of the CPS license to AmerGen in November 1999, and in December 1999 AmerGen purchased CPS. Unicom Corporation (the parent company of Commonwealth Edison Co.) merged with PECO to form Exelon Corporation, which is the parent of EGC. EGC owns 50 percent of AmerGen, and British Energy, Inc., owns the remaining 50 percent. AmerGen operates CPS.

Industry consolidation is continuing throughout the United States. The staff expects other licensees to request the consolidation of EOFs to increase efficiencies. Based on ongoing interactions with the licensee, the staff anticipates that EGC will formally request the consolidation of its Pennsylvania plants' EOFs.

CONTACT: Lawrence K. Cohen, NRR
415-2923

Centralized EOF

As part of their corporate strategy, AmerGen and EGC intend to integrate the CPS EOF with the other Illinois plants that EGC owns and operates. Toward that end, AmerGen and EGC plan to standardize the emergency plans, emergency action levels (EALs), and shift staffing for all these plants. A key part of this plan is to consolidate the CPS EOF into EGC's centralized EOF (CEOF) for the Midwest Regional Operating Group. The senior managers for AmerGen are also the senior managers for EGC. The CEOF is located at the EGC's corporate headquarters in Warrenville, Illinois. The concept of a centralized EOF and this particular CEOF in Illinois were approved by the Commission in January 1998 in response to SECY-98-274, "Commonwealth Edison Company's Proposal to Centralize its Emergency Operations Facilities at its Corporate Offices," dated November 23, 1998 (included as Attachment 1 for background information).

The Licensee's Request and the Pertinent Regulations

On April 5, 2001, AmerGen requested NRC approval to consolidate the CPS EOF into the CEOF. Under Section 50.54(q) of Title 10 of the Code of Federal Regulations (10 CFR 50.54(q)), licensees can change their emergency plans without prior NRC approval, provided that the change does not decrease the effectiveness of the plan and the plan continues to meet the requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50. AmerGen's request could be seen as decreasing the effectiveness of the emergency plan since the CEOF will be 136 miles from CPS. By comparison, Quad Cities, the plant currently farthest from the CEOF, is 116 miles away. The closest, Dresden, is 32 miles away. Furthermore, Commission approval is required for an EOF relocated more than 25 miles from the nuclear plant. (The original distance of 20 miles, specified in Supplement 1 to NUREG-0737, was changed to 25 miles in SECY-96-170, dated September 18, 1996).

DISCUSSION:

The issue for Commission consideration is whether integrating the CPS EOF into the CEOF would decrease the effectiveness of the CPS emergency response capability. EGC's CEOF has been in operation since May 1999. It is currently used for the 12 former Commonwealth Edison plants in Illinois. The Region III staff observed the operation of this CEOF in several exercises, and concluded that the facility's staff properly followed the established emergency plan and the CEOF adequately performed its function. The CEOF was tested most recently on July 5, 2001, when the CEOF was activated following the declaration of an Alert at Dresden Nuclear Power Station.

The staff considered the following factors in determining whether AmerGen's proposal to consolidate EOFs would decrease the effectiveness of the emergency plan.

State and Local Agreement: AmerGen has obtained letters from the affected State and local jurisdictions approving the proposed consolidation of the CPS EOF.

The Site-Specific Role of the EOF: An EOF has several key emergency response functions. One function is coordinating the offsite response with State and local authorities. The State and local authorities usually send representatives to the EOF to meet face to face with licensee personnel and Federal officials. In Illinois, the State and local authorities operate from their own emergency centers and do not travel to the licensee's EOF.

Staffing and Training: To successfully integrate two companies, it is important to retrain the staffs to understand the differences between the old and new organizations' philosophies, procedures, and processes. To facilitate the transition, AmerGen has replaced some CPS managers with managers who were previously assigned to EGC plants. The licensee stated in its request that it would provide training both on the equipment differences between CPS and the EGC plants in the Midwest Regional Operating Group and on the differences in the operating philosophies, procedures, and processes of the two organizations. Training will be required at all staff levels.

Communication: Effective communication among site personnel, responders, and offsite support agencies is a key to the success of the CEOF. AmerGen has committed to provide the same level of communication with CPS that the EGC has with the other 12 sites and the State and local jurisdictions.

Potential Overloading of the CEOF If Emergencies Occur Simultaneously at Two or More Facilities: This issue was discussed in SECY-98-274, dated November 23, 1998. The CEOF was originally planned for 12 nuclear plants. However, since the CEOF began operating, the two Zion plants have been shut down and are being decommissioned. Therefore, the potential for two or more simultaneous emergencies has not increased. Furthermore, during the original review of the CEOF, the staff observed a scenario at one of the licensee's exercises in which two sites simultaneously experienced an emergency. The licensee adequately handled the simultaneous emergencies.

CONCLUSION:

The proposal to consolidate the CPS EOF into the CEOF is a reasonable action and a logical move for AmerGen and EGC, since the CEOF is already operating. Furthermore, the staff concludes that the consolidation of the CPS EOF into Exelon's CEOF does not reduce the effectiveness of the CPS emergency response capability. Through the inspection program, the NRC staff has found that the use of the EGC CEOF provides reasonable assurance that the public will be protected in the event of an emergency at the EGC plants in the Midwest Regional Operating Group.

RESOURCES

No NRC resources are associated with this paper.

COORDINATION:

The Office of the General Counsel has reviewed this Commission paper and has no legal objection to its content. The Office of the Chief Financial Officer has reviewed this paper for resource implications and has no objection. The Federal Emergency Management Agency has reviewed this Commission paper and has no objection.

RECOMMENDATIONS:

The staff recommends that the Commission approve the integration of the CPS EOF into the EGC CEOF.

/RA/

William D. Travers
Executive Director
for Operations

Attachment: SECY 98-274

POLICY ISSUE
(Notation Vote)

SECY-98-274

November 23, 1998

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: COMMONWEALTH EDISON COMPANY'S PROPOSAL TO CENTRALIZE ITS EMERGENCY OPERATIONS FACILITIES AT ITS CORPORATE OFFICES

PURPOSE:

To obtain Commission approval of the proposal by Commonwealth Edison Company to replace its four nearsite emergency operations facilities with a centralized emergency operations facility.

CATEGORY:

This paper discusses a major policy issue requiring Commission consideration.

SUMMARY:

Commonwealth Edison Company (ComEd) proposed to consolidate the four emergency operations facilities (EOFs) at its five operating nuclear power plant sites into a centralized EOF (CEOF) at its corporate offices. Commission approval is required if the EOF is to be located beyond 5 miles of the 20 miles from the site; the distances from the plant sites to the proposed central EOF would range from 32 miles (Dresden) to 116 miles (Quad Cities). For the two similar exception requests by other licensees, the Commission approved one and disapproved the other. The particular circumstances of this proposal are unique in that (1) the Commission already approved the use of the proposed facility as an Interim EOF until the nearsite EOFs can be staffed, (2) the State of Illinois and local decisionmakers do not go to the nearsite EOFs,

CONTACT: Lawrence K. Cohen, NRR
301-415-2923

and (3) the staff believes there would be an improvement in the effectiveness of ComEd's implementation of its emergency plans. While there may be a negative perception that the greater distances involved in the proposed plan would impede the licensee's ability and NRC's ability to perform their respective functions, the staff believes that technological advances in communications and monitoring capabilities, the stationing of other governmental officials remote from the sites, the proximity of NRC's Region III offices to the CEOF, and the improvement in ComEd's emergency response capability outweigh the concerns regarding the distance between the proposed CEOF and the sites. The staff is confident that this proposal will provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. In addition, if approved, there will be resource savings for the licensee and NRC.

BACKGROUND:

In a letter dated January 5, 1995, ComEd submitted a proposal to change its emergency plan to use ComEd corporate offices as a CEOF and eliminate the four nearsite EOFs (Attachment 1). This proposal was considered by the staff only after progressive improvements were demonstrated by ComEd in its effectiveness with regard to emergency preparedness (EP).

Evolution of ComEd's Proposal: In the early 1990s, ComEd relocated its corporate Nuclear Operations Division headquarters from Chicago to Downers Grove, Illinois, where it constructed an EOF in its corporate offices designed to function like a nearsite EOF. It was licensed as a backup EOF for the Zion Nuclear Power Station. In letters dated March 31 and August 5, 1993, ComEd proposed to use the corporate offices as an Interim EOF until the affected nuclear power station's nearsite EOF would be staffed and operational (Attachments 2 and 3). The NRC staff deferred the review of the January 5, 1995, ComEd proposal to use the Interim EOF as a permanent CEOF until the Commission made its decision on the interim use proposal.

In a staff requirements memorandum (SRM) dated January 31, 1996, (Attachment 4), related to SECY-95-274, the Commission approved the Interim EOF proposal. Following that approval, the staff initiated its review of the permanent CEOF request. A number of issues needed to be resolved, including timely staffing of the CEOF, direct interactions with the State and county officials, and the effect on NRC's accident response procedures. On March 25, 1998, a meeting was held with the licensee. In that meeting, the staff requested that the licensee reaffirm its proposal in light of substantive changes that had transpired since the initial proposal was submitted including management changes at ComEd, staff reductions, and the permanent cessation of operations at Zion. In a letter dated August 7, 1998, ComEd confirmed its request for approval of its proposal to combine the four nearsite EOFs into a CEOF (Attachment 5).

ComEd's Justification: The initial impetus for many of these changes was ComEd's recognition of shortcomings in its emergency preparedness program and its need for improvement. In an NRC emergency preparedness inspection report of August 20, 1992, documenting an assessment of ComEd's corporate emergency response program, the staff noted ComEd's inability to staff its nearsite EOFs in a timely manner following the declaration of an emergency (i.e., within the 60 minutes provided in regulatory guidance) (Attachment 6). Consequently, ComEd undertook an improvement program including conducting several off-hours callout drills involving its nearsite EOF responders and performing a comprehensive survey of responder estimated travel times to assigned EOFs. These drills demonstrated that the times needed to staff the nearsite EOFs ranged from 1.5 to 3 hours. The majority of ComEd's Interim EOF responders either are based at the corporate office or can arrive at the Interim EOF quicker than they can arrive at the assigned nearsite EOF. In its proposal, ComEd stated that it can meet the 1-hour goal for staffing the Interim EOF and that it achieved this goal in numerous drills; this is a substantial improvement over the 1.5 to 3 hours determined by ComEd to be necessary to staff the nearsite EOFs (Attachment 7).

ComEd's CEOF proposal was submitted as a cost-beneficial licensing action. The licensee stated that consolidation of the nearsite EOFs will save resources. In a letter dated August 7, 1998, ComEd presented a cost analysis indicating a one-time savings of $78,000 to $108,500 and an annual savings of $342,817 to $359,168. The lower values reflect the permanent cessation of operations at the Zion facility.

ComEd's Emergency Response Strategy: ComEd's emergency response strategy involves staffing the majority of the positions at its nearsite EOFs with corporate personnel and personnel from unaffected stations. This approach to nearsite EOF staffing is a departure from industry practice, however, ComEd stated that this strategy optimizes the use of its senior managers; this strategy allows the affected station's management to focus on the onsite response while the nearsite EOF management focuses on offsite response issues. This strategy for staffing its onsite and offsite emergency response organizations influences the nearsite EOF staffing times. In its procedures, ComEd clearly states that there are no provisions or need for the EOF/CEOF Manager of Emergency Operations (MEO) to drive to the site for a face-to-face meeting with the Technical Support Center (TSC) Station Director. Therefore, ComEd asserts that when the CEOF is operational, there should not be a concern that the MEO is too far from the plant to meet face to face with the TSC Station Director.

ComEd's standard practice for EP exercises has been to pre-stage EOF responders at a location in the vicinity of the nearsite EOF and to pre-stage corporate EOF responders in a nearby room in the corporate office. Although such pre-staging of pre-selected participants is acceptable for scheduled EP exercises, it does not necessarily provide an accurate assessment of the time needed for staffing of the nearsite EOFs and the Interim EOF in an actual emergency. Consequently, in response to NRC staff concerns, ComEd developed an unannounced callout drill process to assess its effectiveness for staffing and established a repetitive performance measure.

Regulatory Issue: ComEd's proposal is a departure from the NRC regulatory guidance for acceptable methods for meeting the EP requirements of 10 C.F.R. 50.47 and Appendix E to 10 C.F.R. Part 50. In particular, the proposal is a departure from guidance on location and staffing, contained in NUREG-0696, "Functional Criteria for Emergency Response Facilities," and NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements (Requirements for Emergency Response Capability)."

In an SRM dated March 3, 1983, the staff was directed to refer all requests for such exceptions to the Commission (Attachment 8). The Commission directed that the referrals are to contain the proposed staff action. The Secretary reconfirmed this decision in a memorandum of April 30, 1987 (Attachment 9). In an SRM dated September 18, 1996, related to SECY-96-170, the Commission reaffirmed the requirement that it approve proposed exceptions from the guidance for locations and staffing times of EOFs, except that the staff was authorized to accept or reject exceptions to the criteria for EOF and backup EOF locations within 5 miles beyond the distance recommended in NUREG-0737 Supplement 1. For cases where the licensee proposed an exception involving a greater deviation and for all CEOF proposals, the staff is required to obtain Commission approval (Attachment 10).

DISCUSSION:

Regulations and Regulatory Guidance Documents: In 10 C.F.R. 50.47(b), the NRC delineates the standards that emergency response plans for nuclear power reactors must meet, including the following: "... (2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available" and "(3) ... arrangements to accommodate State and local staff at the licensee's nearsite Emergency Operations Facility have been made ..." (emphasis added), In addition,

Section IV.E of Appendix E to 10 C.F.R. Part 50 states: "Adequate provisions shall be made and described for emergency facilities and equipment, including: ... (8) A licensee onsite technical support center and a licensee nearsite emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency" (emphasis added).

The Commission issued Supplement 1 to NUREG-0737 to provide NRC guidance regarding acceptable methods for meeting its EOF emergency planning requirements. Supplement 1 to NUREG-0737 specifies that (1) the EOF must be located between 10 and 20 miles from the site (a primary EOF may be located closer than 10 miles if a backup EOF is located between 10 and 20 miles from the site) and (2) Commission approval is required if the EOF is to be located more than 20 miles from the site. In Table 2, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," the 1-hour goal for the response time to staff the EOF (after an emergency has been declared) is specified and, in Section 8.4.1.b.i., the guidance stipulates that the NRC will consider reasonable exceptions to the goals for the number of additional staff personnel and response times for their arrival. Supplement 1 to NUREG-0737 specifies that the EOF will provide for the key functions of (1) management of overall licensee emergency response, (2) coordination of radiological and environmental assessment, (3) development of recommendations for public protective actions, and (4) coordination of emergency response activities with Federal, State, and local agencies.

ComEd's Corporate Generating Stations Emergency Plan (GSEP): ComEd owns and operates 10 nuclear power reactors at five sites (Braidwood, Byron, Dresden, LaSalle and Quad Cities) in Illinois. (On February 13, 1998, ComEd informed the NRC of the permanent cessation of operations at the Zion facility.) The GSEP has a station-specific annex for each site and, in its current GSEP, ComEd has four dedicated nearsite EOFs for these sites that conform to the distance criteria in Supplement 1 to NUREG-0737. The GSEP includes the use of the Interim EOF in its corporate offices until a nearsite EOF is staffed. The corporate Interim EOF is also the approved backup EOF for Zion. The corporate Interim EOF (the proposed CEOF) is located beyond the distance specified in Supplement 1 to NUREG-0737 for nearsite EOFs. Attachment 11 provides a map and table showing the location of and distances between the ComEd sites and EOFs. The attachment indicates that the distances between the proposed CEOF and the ComEd sites range from 32 miles (Dresden) to 116 miles (Quad Cities).

ComEd estimated that it would take 1.5 to 3 hours for staffing its nearsite EOFs, depending on the site involved, the availability of EOF personnel, time of day, weather and road conditions. This is based upon the results of several off-hours callout drills and a comprehensive survey of responder estimated travel times to assigned EOFs. These estimated times exceed the 1-hour EOF staffing goal specified in Supplement 1 to NUREG-0737, Table 2, and NUREG-0696, and is due, in part, to ComEd's emergency response staffing strategy.

Subsequent to the SRM dated January 31, 1996, ComEd revised its GSEP to include the use of its corporate Interim EOF (including a staffing goal set at 1 hour) as the Interim EOF for all sites until a nearsite EOF was staffed. The Interim EOF would be staffed following the declaration of an Alert or higher emergency classification. If a Site Area Emergency or a General Emergency were declared, a senior corporate EOF official would assume overall command of the ComEd response until the nearsite EOF is staffed and capable of assuming command and control responsibilities.

ComEd's Proposal: ComEd's proposal is to eliminate the nearsite EOFs and establish a CEOF at its corporate offices. ComEd's specific positions follow:

- Emergency response capabilities would be enhanced by improving the timeliness of responders to relieve their technical support center (TSC) counterparts of certain responsibilities (the CEOF could be staffed within 1 hour)

- Establishment of a CEOF would not adversely impact the capabilities of EOF staff to work with State, county, and NRC Site Team responders

- NRC's regulations and guidance do not mandate that a nearsite EOF must be equipped and available for use as a Joint Operations Center (JOC) for the Lead Federal Agency, as described in the Federal Radiological Emergency Response Plan (FRERP)

- There is no need to establish a Joint Public Information Center (JPIC) at the corporate office and no need to have a senior corporate spokesperson at the on-scene JPICs

- Establishing a CEOF in place of four nearsite EOFs would save resources.

Interim EOF Activation Timeliness: The strategy to create an Interim EOF significantly improved ComEd's staffing timeliness and there has been an evident improvement in staffing timeliness since 1996. Historically, prior to using the Interim EOF, the nearsite EOFs were not fully staffed for up to 3 hours. With the use of the Interim EOF, activation times decreased, approaching the 1-hour goal. On September 18, 1995, before the approval of the Interim EOF, a Region III inspector stationed at the corporate Interim EOF observed a successful, off-hours, unannounced callout drill. Subsequently, between September 1995 and January 1997, ComEd conducted 10 callout drills using a computer-based callout system (Voice Recognition Unit or VRU); only 3 were fully successful (Attachment 12).

During an actual emergency event that occurred on May 10, 1996, the staffing of the Interim EOF was unsatisfactory. In the early morning hours of May 10, 1996, a tornado caused damage at the Quad Cities Station. In accordance with procedures, an Alert was declared and the onsite response facilities and the Interim EOF were activated. Minimum staffing of the Interim EOF, as defined in the emergency plan, was not achieved until 98 minutes after the Alert declaration, 38 minutes beyond the 60-minute goal for staffing the Interim EOF.

To improve performance and reliability, ComEd embarked on a series of initiatives to improve the notification and callout of emergency responders and to meet the 1-hour goal for activation of the Interim EOF. ComEd installed new systems and protocols to solve its notification and callout problems. In July 1997, ComEd switched to the Community Alert Network (CAN), which is a contractor-provided, automated callout service based in Nevada and New York. This is the system that is presently in use. However, in several drills in the summer of 1997, ComEd was unable to lower the staffing times to meet the 1-hour goal. Additional changes were made to improve communications, including improved training. In February 1998, communication drills were conducted on a weekly frequency to improve the callout times. Out of seven CAN drills, four were fully successful and three achieved staffing times between 67 to 84 minutes.

In April 1998, ComEd implemented a new process to achieve consistent EOF staffing times of under 1 hour. It developed a new system using pagers and dedicated response teams. ComEd conducted four weekly off-hour drills to test the system. Three drills were fully successful. The fourth test was indeterminate because of recording discrepancies for one member of the response team. As part of a commitment to NRC, on May 14, 1998, ComEd conducted a successful actual drive-in drill in which the response team actually drove in to the CEOF from their homes. Minimum staffing occurred within 40 minutes of the classification time.

In its August 7, 1998, submittal, ComEd strengthened its commitment to timely activation. ComEd formally committed to minimum staffing of the Interim EOF within 1 hour at the Alert emergency classification. (NRC guidance calls for staffing the EOF at the Site Area Emergency.) Previously, ComEd's GSEP only stated that it had a *goal* to activate the Interim EOF in 1 hour. In addition, ComEd also committed to conducting unannounced, off-hours, drive-in callout drills every 6 months until it has achieved three consecutive successful drills.

After three consecutive successful drills are achieved, ComEd would reduce the drill frequency to once every 6 years.

On August 4, 1998, at 4:13 a.m. (CDT), an Unusual Event was declared at the Byron Station. Although not required, ComEd elected to implement the EOF activation procedure; it took 68 minutes to activate the Interim EOF. Consequently, ComEd will continue to drill on a frequent basis until it achieves 3 consecutive Interim EOF activations within 60 minutes.

Unique Site-Specific Considerations: NRC's EOF requirements envisioned that the EOF would serve as the location for the licensee, State and local agency representatives to meet face-to-face, allowing TSC staff to concentrate on onsite issues and mitigative actions. In light of the State and county agencies' plans for responding to emergencies at ComEd sites and the unique capabilities of the Illinois Department of Nuclear Safety (IDNS), this is not an issue for the ComEd proposal.

With respect to ComEd's situation, State and county emergency response organizations operate from their own emergency centers and do not send decisionmakers to the nearsite EOFs. This approved arrangement has been in effect for more than 10 years. Coordination and interaction with the licensee take place by telephone and computerized communications. The three States (Illinois, Wisconsin, and Iowa) within one or more of the ComEd sites' 10-mile emergency planning zones reviewed ComEd's proposal and agreed that the strategy is compatible with their approved emergency plans (included in Attachment 1). IDNS stated that as long as adequate information flow, cooperative assessment, and decisionmaking are achieved, a centralized EOF should not impede effective emergency response. Federal Emergency Management Agency (FEMA) Region V staff reviewed ComEd's proposal and indicated that it will have no impact on offsite preparedness (included in Attachment 1).

In addition, IDNS maintains a computerized data link to the ComEd nuclear stations that provides real-time access to hundreds of plant parameters whether or not an emergency is declared. IDNS has independent vent stack monitors and a network of radiation detection instruments around each ComEd nuclear station. IDNS also maintains a resident engineer at each ComEd nuclear station, who would report to the onsite TSC.

Impact on NRC's Incident Response and NRC Resources: Commission approval of a CEOF at ComEd's corporate office would not be consistent with longstanding Commission policy, as reflected in NUREG-0728 and -0845 and other more recent NRC publications, that the lead for NRC's incident response should be on-scene during an emergency. Although the NRC resident inspector for the affected site would be augmented by several other NRC Site Team representatives in the onsite emergency response facilities, the majority of the NRC Site Team, including the Director of Site Operations (DSO) and many key aides, would be located at the proposed CEOF rather than on-scene. ComEd indicated that pre-designated office space for NRC Site Team representatives in each nearsite EOF would remain available, if needed by NRC, and ComEd would provide any needed communications equipment.

In response to anticipated concerns about a "remote EOF" concept, ComEd raised the issue of using the nearsite EOF as a Joint Operations Center (JOC) for Federal agencies to save Federal resources. Neither the memorandum of understanding between NRC and FEMA concerning the FRERP or NRC regulations require that a licensee convert or allow the nearsite EOF to become a JOC. Also, it has been suggested that NRC could establish the JOC either at FRMAC (Federal Radiological Emergency Monitoring and Analysis Center) or at FEMA's Disaster Field Office.

If the Commission approves ComEd's proposal, the NRC's DSO could appoint another manager to serve as a senior NRC spokesperson at a nearsite JPIC. However, this could separate two key NRC managers for the purpose of a press conference. ComEd's procedures

call for its key staff at the JPIC to be technically knowledgeable of the plant and plant conditions. The key staff would be available to interface with the NRC if communications links to the proposed CEOF were unsatisfactory. However, the "remote" location of the senior NRC decisionmaker from the site may create an appearance of "NRC remoteness" that may not be desired. In addition, should the Chairman, President, other elected representatives, or other decisionmakers go to the site, it is likely that the senior NRC manager would be required for support. This could take the senior NRC manager more than one hundred miles from the licensee's senior decisionmaker. These impediments must be weighed in the context of the benefits realized by a more timely response during the earliest stages of an emergency.

The proposed CEOF is about 15 minutes away from the NRC Region III office by automobile. Such proximity will simplify the deployment of the EOF component of an NRC Site Team to the CEOF. If the proposal is approved, NRC Site Team counterpart space and communications provisions may need to be refined. Staffing for the onsite component of an NRC Site Team should also be reassessed to include an onsite NRC manager to augment the resident inspectors and several other on-scene NRC responders, at a minimum.

ComEd Resource Savings: Although the JPICs for all but the Zion facility would remain in the same buildings as the EOFs, ComEd expects to achieve an initial one-time savings of $78,000 to $108,500 and an annual savings of up to $359,168 by eliminating its four nearsite EOFs.

Alternate CEOF: The staff raised a concern about the likelihood that the proposed CEOF at ComEd's corporate office could become unavailable because of the effects of an earthquake or a tornado, an outage of communications equipment, or a security event. There is also a very small likelihood that an event at another facility could affect availability. ComEd stated that, if the CEOF became unavailable for use, the CEOF responsibilities could be transferred to the TSC at one of its unaffected nuclear stations. Although ComEd indicates that it has no immediate plans to modify its TSCs with respect to training, staffing and layout to formalize the use of a TSC as an alternative to the CEOF, the staff believes that the proposed transfer approach is feasible without affecting public health and safety because the TSC responders at the other sites have had training similar to that received by the EOF responders in the CEOF.

Previous Commission Decisions: The Commission has approved five exceptions to its EOF location policy, where the licensee proposed to locate the EOF outside the 20-mile radius from the nuclear power plant. Generally, these exceptions involved locating the proposed EOF a few miles beyond the 20-mile criterion. There is limited experience for locating the EOF at a distance of the order of 100 miles from the nuclear power plant. The Commission considered two emergency plans that proposed a CEOF where the location significantly exceeded the distance criteria in Supplement 1 to NUREG-0737; as discussed below, in one case the Commission approved the proposal, while it disapproved the proposal in the second case.

In early 1981, the Commission approved the Tennessee Valley Authority (TVA) plan to locate the EOF for its nuclear power plant sites beyond the distance which was later specified in NRC guidance, Supplement 1 to NUREG-0737, issued in 1982 (Attachment 13). The TVA emergency plan specifies the use of a CEOF, which is located approximately 104 miles from TVA's Browns Ferry nuclear plant, with accommodations near each plant for an NRC Site Team. In 1995, Watts Bar Station was licensed. Watts Bar also utilizes the TVA CEOF, which is located approximately 50 miles from the site; the location of the CEOF relative to the Watts Bar site was not explicitly addressed in the licensing action. Region II's experience through inspections and exercise observations confirms that the remote EOF concept is feasible and can afford reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

The Commission disapproved an exception to the guidelines for locating the EOF for the Oconee Nuclear Station (Attachment 14). Duke Power Company, licensee for Oconee,

proposed to use a CEOF located 125 miles from the Oconee site. The staff recommended that the Commission disapprove the Oconee proposal because the principal EOF management staff could not interact directly (face-to-face) with its Federal, State, and local counterparts located near the plant site (Attachment 15). In addition, the Oconee plan did not contain provisions for staffing a nearsite EOF. The Commission approved the staff's recommendation. A contrary outcome would be reached here if the Commission approves the current proposal. However, in this situation, a unique circumstance exists since other governmental decisionmakers, at their own election, will not be located near the plant site.

STAFF EVALUATION OF PROPOSAL:

The Commission's regulations require reactor licensees to provide a "nearsite" EOF, 10 C.F.R. § 50.47(b)(3) and 10 C.F.R. Part 50, Appendix E, § IV.E. The term "nearsite" is not defined in the regulations, and Commission guidance has not clarified the meaning of this term except that Supplement 1 to NUREG-0737 indicates that EOFs may be approved by the staff without Commission involvement up to 20 miles from a reactor site, and the Commission may approve EOFs located beyond that distance. In view of the lack of a clear definition of the term "nearsite," and the Commission's approval of the CEOF for TVA's sites, an exemption from the Commission's regulations does not appear to be required.

In NUREG-0696, the Commission described the importance of the EOF as follows: "When the EOF is activated, the functions of providing overall emergency response management, monitoring and assessing radiological effluent and the environs, making offsite dose projections, providing recommendations to State and local officials, and coordinating with Federal officials will shift to the EOF," (NUREG-0696 at 5). With respect to the location of the EOF, NUREG-0696 states:

> The location of the EOF, and whether a backup facility is required, should consider the following factors:
>
> > Whether the location provides optimum functional and availability characteristics for carrying out the licensee functions specified for the EOF (i.e., overall strategic direction of licensee onsite and support operations, determination of public protective actions to be recommended by the licensee to offsite officials, and coordination of the licensee with Federal, State, and local organizations).
> >
> > Whether the EOF functions would be interrupted during radiation releases for which it was necessary to recommend protective actions for the public to offsite officials.
>
> It is strongly recommended that the EOF location be coordinated with State and local authorities to improve the relationship between the licensee and offsite organizations. *Id.* at 17-18. *Accord*, Supplement 1 to NUREG-0737, at 22, § 8.4.1.a.

In an early decision concerning the importance of an EOF, the Commission emphasized the importance of face-to-face communications among decisionmakers, stating as follows:

> [T]he EOF is the ideal place for face-to-face communications regarding protective action recommendations between Federal, State and local officials, and the licensee official charged with making the recommendation to the [State]. The Commission does not believe ... that telephonic communications between the governmental officials in the

> EOF and the licensee's decisionmaker in the control room provide an equivalent opportunity for an exchange of information. The Commission views the opportunity for face-to-face communications as the best means to exchange pertinent information between Government officials and the licensee and to formulate protective action recommendations, particularly when it is essential that there not be misunderstandings between those involved. *Metropolitan Edison Co.* (Three Mile Island Nuclear Station, Unit No. 1), CLI-83-22, 18 NRC 299, 308 (1983).

The Commission further stated that the EOF "... is where State, local and Federal officials will congregate to exchange information." *Id.* at 309. The Commission similarly emphasized the importance of face-to-face contact among decisionmakers at the EOF in denying Duke Power Company's proposed CEOF for Oconee, as the Court of Appeals noted in finding that the Commission acted within its discretion in denying that proposal. *See Duke Power Co. v. NRC,* 770 F.2d 386, 390-91 (4th Cir. 1985).

The Commission's prior emphasis on the importance of a nearsite EOF in facilitating face-to-face communications does not appear to apply with equal force in the situation presented by ComEd's proposal, as discussed below.

ComEd proposes to use a CEOF, located from 32 to 116 miles from an affected site and staffed within 1 hour of an Alert or higher emergency classification, as an alternative to that specified in NRC's guidance. ComEd's proposal is a departure from the NRC guidance that a nearsite EOF is to be located within 20 miles of the site. With the exception of the location of the CEOF, the CEOF meets all of the staff requirements.

ComEd's proposal provides for performance of all the key EOF functions. The functional capabilities of the CEOF were considered previously and accepted by the staff in approving the facility as the Interim EOF and Zion Backup EOF. NRC inspections of the exercises conducted while the licensee was using the CEOF confirms its functional capabilities.

The existing CEOF has emergency response capabilities (data collection, dose assessment, and communications equipment) similar to those of nearsite EOFs with the exception of FTS-2000 communications lines. NRC would be responsible for installing the lines for the FTS-2000 system. However, NRC would maintain only one system rather than four systems. It is estimated that NRC would save $10,000 per year if this proposal was approved.

ComEd's commitment is to have the CEOF staffed within about 1 hour of an emergency declaration (Alert or higher) to relieve the TSC staff of responsibilities for offsite interfaces if a Site Area Emergency or a General Emergency is declared. ComEd would staff the CEOF following the declaration of an Alert with the positions equivalent to the staffing plan (minimum staff of 8 and full staff of 13) for the currently approved Interim EOF. The remainder of the CEOF staff would be activated following the declaration of a Site Area Emergency or a General Emergency. Staffing of the CEOF at the Alert level exceeds the guidance of Supplement 1 to NUREG-0737 and increases the overall timeliness of ComEd's emergency preparedness.

The arguments and facts presented by ComEd in its proposal and subsequent correspondence, as well as the results and findings of NRC inspections and events that have ensued since ComEd first proposed the CEOF concept indicate that it would likely provide an increase in effectiveness of emergency preparedness for ComEd. ComEd stated (and the staff agrees) that the CEOF can generally perform the required functions of an EOF in terms of coordinating offsite activities associated with an accident, as envisioned in the regulations and guidance discussed above, and from the lessons learned from Three Mile Island.

With respect to the State and local agencies, the issue of the distance for the EOF is not relevant in this situation since these agencies do not send decisionmakers to the nearsite EOF. The State of Illinois has an effective program, and maintains its own inspectors in the plant with direct data links to the licensee's computers. NRC inspectors, over the years, have verified that the EOF staff functions and performs the role of coordinating and directing offsite activities associated with an incident even though decisionmakers from the State and local support agencies are not present in the EOF. On the basis of these considerations, the staff has concluded that, in this situation, the distance between the site and the proposed CEOF would not affect the licensee's performance. However, there could be a negative public perception: that the licensee cannot respond to an accident and the NRC Site Team cannot provide effective oversight, from a distance of more than 100 miles from the site. This perception can be addressed by accurately presenting the facts to the public.

ComEd has had problems in timely activation of the Interim EOF as demonstrated in callout drills and in an actual event (the tornado at Quad Cities in May 1995). However, ComEd has taken substantial steps and instituted new programs to solve this problem. ComEd has made a strong corporate commitment to make its proposal work. The results of recent drills show continued improvement in staffing times compared to earlier drills. The licensee has committed to revise the language in the emergency plan to commit to the activation of the proposed CEOF in 1 hour after the declaration of an Alert or higher emergency classification. The main issues remaining are the reliability of ComEd's callout systems and the continuous demonstration of timely activation of the proposed CEOF.

ISSUE:

The issue is whether to permit ComEd to eliminate the four nearsite EOFs in favor of one CEOF.

OPTIONS:

(1) **The Commission could reject the proposal.**

Pro:

- would maintain consistency with NRC policy in effect since 1982
- would avoid the possibility of additional proposals from other licensees in similar situations
- would not affect the NRC's and Federal planning for deploying on-scene responders

Con:

- Rejection of the proposal would send a negative message to the State and county officials that NRC does not approve of remote decisionmaking
- no resource savings would be realized for ComEd by eliminating four nearsite EOFs
- ComEd would continue to have to transfer responsibilities from the Interim EOF to the nearsite EOF
- would dilute the licensee's pool of senior managers available to fill key emergency response positions

- no resource savings would be realized for NRC by eliminating three sets of FTS-2000 lines

(2) The Commission could accept the proposal.

Pro:

- rapid deployment of the NRC Site Team due to the close proximity of the regional office to the proposed CEOF
- resource savings realized for ComEd by eliminating four near-site EOFs
- would eliminate the transfer of responsibilities from the Interim EOF to the near-site EOF
- resource savings would be realized for NRC by eliminating three sets of FTS-2000 lines

Con:

- potential negative public perception of lack of near/onsite response
- possible influx of proposals from other licensees in similar situations
- would require a modification to NRC planning for deployment of site team personnel
- could require FEMA and/or NRC to reevaluate the expectation that a licensee's nearsite EOF is the optimum location for the Lead Federal Agency's JOC rather than an on-scene, Federally - managed response facility such as FEMA's Disaster Field Office or a FRMAC

CONCLUSION AND RECOMMENDATION:

The ComEd proposal constitutes a departure from the EOF location criteria in Supplement 1 to NUREG-0737. The CEOF meets all the functional as well as the physical requirements (i.e. communications, space, and visual information displays) for EOFs as identified in various agency documents. Conditional upon ComEd's commitments and plan of action, it is expected that the licensee will meet the NRC guidance for timely staffing of the EOF, a goal that has eluded this licensee for years. Commission approval of the proposal will also eliminate the additional step of transferring responsibility for command and control from the currently approved Interim EOF to the nearsite EOF. The ComEd proposal maximizes the use of senior managers to fill key onsite and offsite emergency response positions. Adoption of this proposal will save resources for both the NRC and ComEd.

The acceptance of ComEd's proposal by State and county officials responsible for taking protective measures to protect the health and safety of the populations within the ComEd sites' 10-mile emergency planning zones is a significant factor. Decisionmakers remain in their respective centers and are not sent to the EOFs. The acceptance of this approach relies, at least in part, on the existence of the unique IDNS capability to independently monitor plant radiological effluent conditions, including real-time access to hundreds of other plant parameters.

ComEd's proposal impacts the NRC's policy that the DSO from the NRC Site Team should be on-scene during an emergency and affects the NRC's planning for Site Team deployment for the site EOFs. However, the NRC Site Team deployment to the proposed CEOF should be more effective because the CEOF is accessible in 15 minutes by car from the Region III offices. The total effect on the NRC resources is expected to be minimal.

The staff recommends that Option 2 should be adopted.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objection. The Office of the Chief Information Officer has no objections to the information implications contained in this paper.

William D. Travers
Executive Director
for Operations

Attachments:
1. ComEd letter re: Proposal for Centralized EOF, dated January 5, 1995
2. Emergency Plan Changes, dated March 31, 1993
3. ComEd Response to Staff RAI re: Emergency Plan Changes, dated August 5, 1993
4. Staff Requirements Memorandum, related to SECY-95-274, dated January 31, 1996
5. ComEd letter re: Updated Proposal for CEOF, dated August 7, 1998
6. NRC EP Inspection Report, dated August 20, 1992
7. ComEd Response to Staff RAI, dated September 17, 1993
8. Staff Requirements Memorandum, related to Commission Meeting (M830302B), dated March 3, 1983
9. SECY Memorandum re: SECY-87-067, dated April 30, 1987
10. Staff Requirements Memorandum, related to SECY-96-170, dated September 18, 1996; and SECY-96-170, dated August 5, 1996
11. Map Showing Locations of ComEd Reactor Sites and nearsite EOFs
12. ComEd Letter re: Results of Drills, dated February 27, 1997
13. SECY Memorandum, related to TVA EOFs, dated January 21, 1981
14. SECY Memorandum, related to SECY-84-089/089A, dated June 12, 1984
15. SECY-84-089, dated February 22, 1984.

Commissioners' completed vote sheets/comments should be provided directly to SECY by COB Friday, December 11, 1998. Commission staff office comments, if any, should be submitted to the Commissioners NLT December 4, 1998, with an information copy to SECY. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

DISTRIBUTION:
Commissioners
OGC
OCAA
OIG
OPA
OCA
CIO
CFO
EDO
REGIONS
SECY

ATTACHMENTS TO COMMISSION PAPER

ON

COMMONWEALTH EDISON COMPANY'S PROPOSAL TO CENTRALIZE ITS EMERGENCY OPERATIONS FACILITIES AT ITS CORPORATE OFFICES

ATTACHMENTS:

1. ComEd letter Requesting Central EOF, January 5, 1995
2. Emergency Plan Changes, March 31, 1993
3. ComEd Response to Staff RAI re: Emergency Plan Changes, August 5, 1993
4. Staff Requirements Memo, January 31, 1996
5. ComEd letter, August 7, 1998
6. Staff EP Inspection Report, August 20, 1992
7. ComEd Response to Staff RAI, September 17, 1993
8. Staff Requirements Memorandum, March 3, 1983
9. Internal Memorandum re: Oconee, April 30, 1987
10. Staff Requirements Memo, SECY-96-170, September 18, 1996; and SECY-96-170, August 5, 1996
11. Map Showing Locations of ComEd Reactor Sites and nearsite EOFs
12. ComEd Letter re: Results of Drills, February 27, 1997
13. Commission Memo re:TVA EOFs, January 21, 1981
14. Commission Memo re: Oconee, June 12, 1984
15. SECY-84-89 re: Oconee, February 22, 1984

Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

January 5, 1995

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Braidwood Station Units 1 and 2
Byron Station Units 1 and 2
Dresden Station Units 1,2, and 3
LaSalle County Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2

Commonwealth Edison Submittal: Proposal to Consolidate Near-Site Emergency Operations Facilities (EOFs) into a Single Central EOF

NRC Dockets 50-454 and 50-455
NRC Dockets 50-456 and 50-457
NRC Dockets 50-10, 50-237 and 50-249
NRC Dockets 50-373 and 50-374
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

Reference:
1) Teleconference on July 20, 1994; with Messrs. R. Emch, G. Dick, F. Cantor, and J. McCormick-Barger

2) Meeting between NRC and Commonwealth Edison, October 19, 1994, on Central Emergency Operations Facility (EOF)

3) NUREG-0737, Supplement 1; "Clarification of TMI Action Plan Requirements," dated January 1983.

Pursuant to our telephone call (Reference 1) and meeting with NRC staff (Reference 2), Commonwealth Edison (ComEd) requests the Nuclear Regulatory Commission (NRC) to review and approve the consolidation of our four (4) near-site Emergency Operations Facilities (EOFs) and the Corporate Emergency Operations Facility (CEOF) into one single, central EOF. For the purposes of this submittal the concept of a single, central EOF will be referred to as a "central EOF," to distinguish it from the Corporate EOF (CEOF).

Attachment 1

ComEd further requests that this proposal be reviewed as a Cost Beneficial Licensing Action (CBLA) because of the substantial current and future savings ComEd will realize, an initial one-time savings of approximately $250,000 and estimated annual savings of at least $300,000.

The Corporate EOF, located in our Nuclear Operations Division Headquarters in Downers Grove, Illinois, will serve as the central EOF. This facility is licensed as the Backup EOF for Zion Station. It is similar in capabilities to our near-site EOFs, with the exception of the ENS and HPN lines, which could be added, if desired by the NRC staff. (Further description of the central EOF facility is included in the Attachments to this letter.)

ComEd is not consolidating our Joint Public Information Centers (JPICs). They will remain at their current locations in order to provide a near-site facility for State, Federal, local and utility representatives where information can be provided to the media.

ComEd has also taken into account the need to maintain effective communications with the state and local governments. Therefore, the proposed use of a central EOF has been discussed with appropriate State and local agencies. Letters of support have been received from these agencies (copies enclosed). There will be no change in information flow between these agencies and ComEd as a result of adopting a central EOF concept. The State agencies do not send decision makers to any of the EOFs; only State liaisons are sent who relay information back to the State Emergency Operations Centers. The counties do not send anyone to the EOF and therefore the central EOF concept will not impact them. FEMA Regions V and VII have also reviewed the impact of the proposed central EOF and have no objections.

This proposal is being submitted in accordance with NUREG-0737 (Supplement 1), Section 8.4.1.b (Reference 3) which requires specific approval by the Commission if an EOF is to be located beyond 20 miles from a station. This facility will be a fully staffed EOF and will be capable of assuming all the functions of the EOF described in Reference 3. Pursuant to 10 CFR 50.54(q), these changes do not decrease the effectiveness of the Emergency Plan.

Further supporting documentation for this request is provided in the following Attachments:

Attachment A:	Basis for Request
Attachment B:	Considerations as a Cost Beneficial Licensing Action
Attachment C:	State and Local Governmental Agency Considerations

The proposed Emergency Plan change will be submitted in the first quarter of 1995, and will be implemented within six (6) months after approval by the NRC Commissioners.

ComEd would like to meet with the NRC staff to discuss the merits of this CBLA submittal at their earliest convenience. Please feel free to contact D.L. Farrar at (708) 663-2094 or I. M. Johnson at (708) 663-2096 to further discuss this matter.

Sincerely,

John C. Brons
Nuclear Support Vice-President

Attachments

cc: J. Martin, Regional Administrator-RIII
R. Capra, NRR
G. Dick, NRR
E. Imbro, NRR
S. Dupont, Senior Resident Inspector (Braidwood)
H. Peterson, Senior Resident Inspector (Byron)
M. Leach, Senior Resident Inspector (Dresden)
P. Brochman, Senior Resident Inspector (LaSalle)
C. Miller, Senior Resident Inspector (Quad Cities)
R. Roton, Senior Resident Inspector (Zion)
R. Wight, I.D.N.S.

ATTACHMENT A

BASIS FOR REQUEST

Commonwealth Edison (ComEd) requests the Nuclear Regulatory Commission's review and approval of the consolidation of it's four (4) near-site Emergency Operations Facilities (EOFs) and the Corporate Emergency Operations Facility (CEOF) into one central EOF. Per NUREG-0737, Supplement 1 (Reference 3) use of the central EOF as an EOF for all of our stations will require NRC Commissioner approval since this location is beyond twenty (20) miles from any of our nuclear stations. ComEd is not consolidating it's current Joint Public Information Centers (JPICs). They will remain at their current locations in order to provide a near-site facility for State, Federal, local and utility representatives to provide information to the local media. This request is being submitted as a Cost Beneficial Licensing Action (CBLA). Attachment B provides the basis for consideration as a CBLA request.

The central EOF will utilize a full EOF staff, the same as that currently provided to a near-site EOF. The proposed facility is licensed as the Backup EOF for Zion Station and is being used as an interim EOF under current Emergency Plans. "Minimum Staff"† to the central EOF will be available within the 60 minute "goal" in NUREG-0737, Supplement 1 (Reference 3).

The central EOF will be located in our Corporate Nuclear Operations Division Headquarters which is in Downers Grove, Illinois. Depending on the station, the facility is approximately a 1 to 3 hour drive from a given station. Table 1 provides the direct line distance of the central EOF to each of the stations. ComEd will provide provisions for the NRC Site Team in the central EOF (located approximately three (3) miles from the NRC Region III offices). NUREG-0737, Supplement 1 (Reference 3), provides that for EOFs beyond twenty (20) miles, some provisions for the NRC Site Team closer to the site will be expected. ComEd will make provisions for the NRC Site Team closer to the station, if the NRC deems it necessary.

ComEd's emergency response philosophy will remain unchanged. Since ComEd staffs the EOF with corporate and unaffected station personnel, increasing the distance between the station and the EOF does not negatively impact ComEd's ability to provide response personnel to an EOF in a timely manner. In effect, the proposed location of the central EOF is closer to a large number of ComEd Nuclear Operations personnel and will improve ComEd's ability to more promptly staff the facility. There will be no change in information flow between the EOF and the stations, or between the EOF and State(s) or local agencies. Attachment C contains more information regarding state and local agency considerations.

---

† "Minimum Staff" delineates those positions necessary for the EOF to perform the functions of an EOF required by NUREG-0737, Supplement 1 (Reference 3). The following positions constitute "Minimum Staff": 1) Manager of Emergency Operations, 2) Technical Support Manager, 3) one other member of the Technical Group, 4) Advisory Support Manager, 5) Emergency Planner, 6) Protective Measures Director, 7) Environmental Emergency Coordinator, and 8) ODCS Specialist.

ATTACHMENT A

The central EOF facility is equivalent to our current "near-site" EOFs, with the exception that there are currently no FTS-2000 (ENS or HPN communication) lines. ComEd is willing to provide for the installation of these lines. (Table 2 provides a Facility Space Comparison between a typical near-site EOF and the proposed central EOF. Attachment D provides the floor plan of the proposed central EOF.)

ComEd has reviewed the emergency plan to evaluate if the use of a central EOF would adversely impact any benefits associated with the current near-site EOF locations and has determined that there are no significant negative impacts

Use of a central EOF will not reduce the effectiveness, and in the following ways, will serve to improve the effectiveness of ComEd's Emergency Preparedness Plan:

1) Providing prompt "Minimum Staff" (estimated to be within 15 - 30 minutes) to the central EOF, during normal working hours because of the number (approximately 50) of qualified "Minimum Staff" Offsite Responders typically located at the Downers Grove offices. (A total of approximately 80 qualified EOF responders are typically located at the Downers Grove offices. These individuals would be able to provide a prompt response to the central EOF during normal working hours.);

2) Providing more readily available support from various corporate support organizations which are located at the Downers Grove offices, such as: the Probablistic Risk Assessment Group, the Emergency Preparedness Department, Radiation Protection Department, Licensing Department, Nuclear Fuel Services (core design and analysis) department (scheduled to relocated to Downers Grove on January 16, 1995) and other Engineering Support departments;

3) Enhancing the ability of ComEd senior Nuclear Operations Division management to quickly respond by locating the off-site Emergency Response Organization in the same building as their offices;

4) Providing a facility that is closer to a larger percentage of ComEd's Nuclear Operations personnel, enabling a larger number of personnel to respond (during off-hours activations) to the EOF within a shorter period of time;

5) Increasing the floor space in the EOF for ComEd, State and Federal responders (Table 2);

6) Reducing the susceptibility of the EOF to potential near-site problems such as, restricted travel through or around Emergency Planning Zones (EPZs) and local phone system overloads;

ATTACHMENT A

7) Reallocating financial resources, which would otherwise be expended for maintaining/upgrading the four (4) EOFs (Mazon, Morrison, Dixon and Zion), into one central EOF and back into the Station programs where the money has a more direct bearing on safety;

8) Providing additional benefits due to location, such as; proximity to NRC Region III offices (approximately 3 miles), ease of accessibility (close to both O'Hare and Midway Airports and close to major Interstate highways (I-88, I-290, I-55, I-294 and I-355)), and higher concentration of nearby support resources (local telephone exchange capability, hotels, food services, transportation, etc.).

In consideration of previous requests, made by other utilities, for consolidation of EOFs into a single EOF, ComEd provides the following in support of their unique situation:

1) ComEd operates six (6) nuclear stations (12 units) which are widely distributed across Northern Illinois; and

2) ComEd has a large amount of resources readily available to respond to an emergency event at any one of its nuclear stations; and

3) The central EOF concept is in line with ComEd's longstanding emergency response philosophy of minimizing the impact on the affected station by using personnel from unaffected stations and the corporate offices, rather than using personnel from the affected station (ie., affected station personnel are designated to respond to their onsite emergency facilities allowing them to focus on returning the plant to a safe condition, while non-station personnel are called upon to address and coordinate the offsite aspects of the event); and

4) States do not send "Decision Makers" to the EOF; they send liaisons who relate information back to the State Emergency Operations Centers (EOCs). The States direct their activities from State EOCs, in their respective State Capitols (also located greater than twenty (20) miles from any of ComEd's nuclear stations); and

5) Counties do not send anyone to the EOF; they direct their activities from county EOCs in their respective counties; ComEd and states send liaisons to the county EOCs; and

6) The State of Illinois has designated a permanent agency, the Illinois Department of Nuclear Safety (IDNS), which has it's own extensive unique monitoring and analysis systems; they receive plant status directly from the stations which input into their Reactor Analysts computer programs; they have in-stack effluent monitors that are capable of monitoring for particulate, iodine and noble gas releases from the stations; and they also have gamma monitors around each of the stations that provide them with real time radiation readings within the Emergency Planning Zone (EPZ); and

ATTACHMENT A

7) IDNS currently has Resident Inspectors at Braidwood, LaSalle, Quad Cities, Zion, and Dresden stations (they are in the process of hiring a Resident Inspector for Byron); these individuals report to and remain at the TSC once it is activated and serve as an information/communication path back to IDNS; and

8) ComEd has provided dedicated direct conference lines between the EOF and the decision makers of the states of Illinois and Iowa, and another line between the EOF and the decision makers of the States of Illinois and Wisconsin; and

9) The proposed location for the central EOF is in close proximity (approximately 3 miles) to NRC Region III offices; and

10) The proposed location for the central EOF is already approved as the Backup EOF for Zion Station (The facility has been demonstrated in it's capacity as backup EOF, with a full EOF staff, once with the State of Illinois during the LaSalle 1992 Exercise and during the Zion 1994 Exercise.); and

11) In utilizing a central EOF, ComEd would rely on a remote JPIC, the same in practice as what currently exists for Zion Station. The practice of using a remote JPIC has been demonstrated as effective over the years as shown by Zion Station during numerous Exercises, including the Federal Field Exercise in 1987.

ATTACHMENT A

TABLE 1

STRAIGHT LINE DISTANCE FROM THE STATIONS

STATION	CENTRAL EOF	NEAR-SITE EOF
Dresden	32 miles	10 miles
Braidwood	40 miles	10 miles
Zion	45 miles	0.5 miles
LaSalle	48 miles	10 miles
Byron	66 miles	20 miles
Quad Cities	116 miles	18 miles

ATTACHMENT A

TABLE 2

FACILITY SPACE COMPARISON

AREA	TYPICAL ComEd EOF*	DOWNERS GROVE EOF**
Main Area	4510 sq. ft.	6440 sq.ft.
NRC Area	440 sq. ft.	725 sq. ft.
State Area	400 sq. ft.	870 sq. ft.
TOTAL	5350 sq. ft.	8035 sq. ft.

* Approximate. Does not include kitchen, washrooms, or library.

** Approximate. Does not include kitchen, washrooms, library, or scenario development room. Additional non-dedicated space within the same building could be made readily available. Floor plan included as Attachment D.

ATTACHMENT B

CONSIDERATION AS A COST BENEFIT LICENSING ACTION (CBLA)

ComEd believes that this request meets the NRC's criteria for consideration as a CBLA. This submittal provides a basis for the conclusion that the proposed central EOF will not adversely impact safety. In fact, the use of a central EOF can enhance safety by improving ComEd's emergency response while providing a significant cost savings. ComEd has prioritized this request with respect to it's other pending licensing actions and has concluded that prompt attention is warranted. This proposal is applicable to ComEd's six (6) nuclear stations.

ComEd will realize substantial current and future savings by the consolidation of it's four (4) EOFs and CEOF, into a single central EOF.

A central EOF will provide a one time, initial savings of approximately $250,000. This savings is based on equipment that can be used elsewhere or sold. As an example:

- The central EOF at Downers Grove will free up 23 personal computers (PCs) and 8 laser printers and one local area network (LAN) server from it's existing EOFs, which can be redeployed throughout the company. This is a savings to the company of $52,000, based on a cost of $1500 per PC, $1000 per printer and $10,000 for a LAN server.

- Redeploying the existing Audio Visual equipment in the EOFs throughout the company should save the company $200,000 in avoided expense.

Annual savings of approximately $300,000 will result from reduced communications cost, reduced labor for facility surveillance and maintenance, and reduced labor for document control. For example:

- Based on actual telephone charges, the central EOF in Downers Grove will save approximately $99,700 in telephone costs each year. This savings results from a reduction in the number of telephone lines serving the existing EOFs as well as removing special circuits, such as the state and local notification circuit and automatic ring lines from the near-site EOFs.

- Reduction in the number of microwave channels will result in a savings of approximately $120,000.

- The central EOF will annually save approximately 34 person-days of station management time from the communications drills since station personnel will not need to travel to the near-site EOFs.

ATTACHMENT B

- One less Corporate Emergency Preparedness management staff person would be needed due to the reduced facility surveillance requirements associated with having only one (1) EOF instead of five (5).

- Since the existing EOF at Downers Grove already has all of the manuals needed for GSEP emergency response, and as JPICs need fewer manuals, both in number and type, there would be a savings of approximately 108 person-days per year of station clerical time from updating manuals.

Future savings will be achieved when desired or necessary upgrades of the EOF or its equipment are made. Upgrades such as the change-out of computer systems or technological obsolescence of equipment are often necessary and are dictated by changes made to equipment at the stations. In these cases ComEd will save approximately 80% of the costs to make such changes. As an example, equipment changes that presently cost $100,000 to make, will be reduced to $20,000. In addition, changes can be made in a shorter period. This will reduce the time in which response capability may be degraded by such modifications. Labor cost to manage and complete future upgrades will also be reduced by a similar proportion. Examples of potential future savings include:

- The state and local notification system (called NARS for Nuclear Accident Reporting System) is aging and will need to be replaced in the next decade. While the replacement system hasn't been designed, clearly four (4) fewer locations will be less costly. Based on the cost to install a new NARS site with the current system, ComEd can avoid $10,000 per site or $40,000.

- ComEd is currently planning to replace the single rear screen projection video display in the Executive Management Center with four 37 inch video monitors. This replacement is estimated as at least $25,000 per EOF or $125,000. It will only cost $25,000 to replace the rear screen projector at the central EOF at Downers Grove.

- Personal computers and printers would need to be replaced about every five years due to technical obsolescence. This averages out to $10,000 per year of avoided costs.

ATTACHMENT C

STATE AND LOCAL AGENCY CONSIDERATIONS

In years of conducting Exercises with the State(s) and counties, including a Federal Field Exercise in 1987, it has been demonstrated that face-to-face communications are not necessary for the purposes of decision making. Each State Emergency Response Plan dictates that the State and county decision makers respond to their respective Emergency Operations Centers (EOCs). Therefore there is no face-to-face communication between State and ComEd decision makers under current response plans. Decisions makers rely on telephone and data communications between the EOF and State EOC, and between the State EOC and County EOC(s). The State(s) send liaisons to the EOF, and ComEd sends liaisons to the state and county EOCs. These liaisons exchange information between facilities, they do not make any decisions with regard to the information that they obtain. Experience has shown that ComEd has developed an effective decision making relationship with the State(s) based on various non-face-to-face communication systems and a keen understanding of each of our responsibilities in the decision making process.

Attachment A provides further examples where ComEd's interaction with state and county agencies is unique.

ComEd has notified and discussed the proposed use of a central EOF located in Downers Grove, IL with the appropriate (within the 10 mile emergency planning zone) State (Illinois, Wisconsin and Iowa) and county (Grundy, Will, Kankakee, LaSalle, Kendall, Ogle, Lake, Kenosha, Rock Island, Whiteside, Scott, and Clinton) agencies. The States and counties have confirmed by letter that they support this concept. Copies of their responses are enclosed. ComEd also requested FEMA Regions V and VII to review the offsite emergency plans to evaluate the impact of changing to single, central EOF. They have indicated that they have no concerns. Copies of their responses are also enclosed.

ATTACHMENT C

STATE AND COUNTY SUPPORT LETTERS

Illinois Emergency Management Agency
110 East Adams • Springfield, Illinois • 62706
(217) 782-7860

September 7, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

The Illinois Emergency Management Agency supports the concept of a Central Emergency Operations Facility (EOF). With both public and private organizations trying to reduce costs while maintaining a certain level of preparedness, it is logical to take such a step. In addition, we see no negative impact on the coordination of activities between CECo and State officials related to the utilization of a Central EOF.

If you have any questions, please do not hesitate to call me.

Sincerely,

David L. Smith
Chief, Division of Field Services

DLS:jmb

cc: Rex Coble

State of Wisconsin \ DEPARTMENT OF MILITARY AFFAIRS
Division of Emergency Government

2400 WRIGHT STREET
P.O. BOX 7865
MADISON, WISCONSIN 53707-7865
TELEPHONE (608) 242-3232
FACSIMILE (608) 242-3247
24-HOUR EMERGENCY HOTLINE
1-800-943-0003

DATE: September 8, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
3400 Opus Place
Downers Grove, Illinois 60515-1108

Dear Mr. Scott:

Wisconsin is supportive of ComEd's concept of a Central Emergency Operations Facility (EOF) located in Downers Grove, Illinois.

It is our understanding from conversations, with Mr. T. Blackmon of your staff, that placement of the EOF in Downers Grove will provide the utility with the benefit of the EOF being outside the 10-mile EPZs for all plants. The placement will also provide the utility with the capability to activate in a more timely manner and thus provide the States and Counties with information more quickly. Transfer of Control Room, TSC, CEOF, and EOF communications to offsite agencies will be reduced and we have been assured that the level and content of information being transferred will not be reduced. Prompt notification and Protective Action Recommendations will be provided in the same timeframes.

Any effect on the State of Wisconsin and Kenosha County should be administrative only.

Please keep Wisconsin informed of your efforts and if you require further information or assistance please contact Garrett Nielsen (608-242-3240) or Marcia Smith (608-242-3241).

Sincerely,

Leroy E. Conner, Jr.
Administrator

cc: Paul Schmidt, DHSS-RPU
Terry Blackmon, ComEd
Chris Bacon, DEG

smithm\eocsupltr.ucw

STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF PUBLIC DEFENSE
EMERGENCY MANAGEMENT DIVISION
ELLEN M. GORDON, ADMINISTRATOR

October 7, 1994

Mr. Douglas J. Scott, Dir.
Emergency Preparedness & State Programs
Commonwealth Edison Co.
1400 Opus Place
Downers Grove, IL 60515

Dear Doug:

The State of Iowa does not object to the proposal concept of a Central Emergency Operations Facility located in Downers Grove, as is your current Corporate EOF. During our full scale rehearsals and evaluated exercises, we will of course want to continue sending our Iowa EMD liaisons to the Centralized EOF if the proposal is approved and implemented. We have also discussed this with Don Flater and Don's concerns went to the time of deployment and the perhaps increased cost of sending his technical liaisons to the Centralized EOF.

I and Don both retain the commitment to send our respective liaisons to a Commonwealth EOF whether it remains in Morrison or is centralized in Downers Grove, for all of our full scale rehearsals and exercises and if the proposal is implemented, we would of course make the appropriate arrangements for transportation for both liaisons groups which would function as well during a real emergency.

Let us know how your proposal fares with the NRC and if you would care to discuss it further, please contact Rick Bamsey.

Sincerely,

Ellen M. Gordon

Ellen M. Gordon
Administrator

bjd

cc: Don Flater, IDPH
Terry Blackmon, CECo
Rick Bamsey, EMd
RERP Staff

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY
1035 OUTER PARK DRIVE
SPRINGFIELD, ILLINOIS 62704
217-785-9900
217-782-6133 (TDD)

Jim Edgar
Governor

Thomas W. Ortciger
Director

September 16, 1994

Mr. Doug Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

The Illinois Department of Nuclear Safety (IDNS) has considered your letter regarding the concept of a central Emergency Operations Facility (EOF) at Downers Grove. It is our opinion that as long as adequate information flow and cooperative assessment and decisionmaking are achieved, a central EOF should present no barrier to effective emergency response. We are therefore pleased to support the concept. We request that you provide us a copy of your submittal to NRC so that we can examine the details of your proposal and determine the impact on IDNS plans and programs.

Sincerely,

Roy R. Wight, Manager
Office of Nuclear Facility Safety

RRW:AJP:tlk

cc: Dave Smith, IEMA

Grundy County
Emergency Services & Disaster Agency
Nuclear Planning Division
1320 Union Street - Room E-01
Morris, IL 60450-2426
Telephone: 815/941-3212 Telefax: 815/941-3456

November 4, 1994

Mr. Douglas J. Scott
ComEd Emergency Preparedness Director
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

Regarding the ComEd proposal to operate a single, central Emergency Operations Facility that would be associated with the Downers Grove Corporate Offices, I believe that the concept makes good sense.

As a County that is impacted by the Emergency Planning Zones of the Braidwood, Dresden, and LaSalle Stations, my view is that at the very worse case such a move would be undetectable to our operation. I suspect, by having the EOF associated with the Corporate Office, the time that it would take to be operational would be reduced. Additionally, the corporate staff would provide the EOF with expanded resources for both the company and off-site response organizations.

Therefore, I see the concept of a single central EOF as a very positive and beneficial move for the emergency operations community.

Sincerely,

Jim Lutz

JL/dpd

WILL COUNTY
OFFICE OF EMERGENCY MANAGEMENT

DONALD B. GOULD
Director

302 NORTH CHICAGO STREET
JOLIET, ILLINOIS 60431-1039
815-740-8351 - OFFICE
815-740-0911 - 24 HR. EMERGENCY
815-723-8895 - TELEFAX

November 22, 1994

Mr. Doug Scott,
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

Will County has received the proposed request for a single, central Emergency Operations Facility. This facility will be located at the Downers Grove Office.

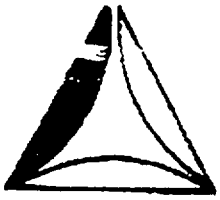
Will County has no objections to the proposed move, as it should not affect their operations or public information that is given at the present time. We support Commonwealth Edison efforts to improve efficiency while not lessening the emergency planning efforts.

If you have any questions or need additional information regarding this response, please contact me at 815/740-8351.

Sincerely,

Donald Gould

Donald Gould, CEM
Director



LaSalle County
Emergency Services and Disaster Agency

NOVEMBER 12, 1994

MR. TERRY BLACKMAN
GOV. AFFAIRS SUPERVISOR
1700 OPUS PLACE, SUITE 500
DOWNERS GROVE, IL 60515

RE:CENTRAL EOF

DEAR TERRY:

THIS IS IN RESPONSE TO YOUR LETTER DATED NOVEMBER 1, 1994 REGARDING THE SINGLE CENTRAL EMERGENCY OPERATIONS FACILITY (EOF).

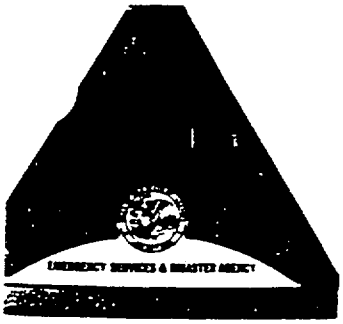
LASALLE COUNTY SUPPORTS COMED'S REQUEST TO USE A SINGLE CENTRAL EOF IN PLACE OF THE VARIOUS EOF'S. WE APPLAUD COMED'S EFFORT IN REDUCING THE COST ASSOCIATED WITH MAINTAINING THESE FACILITIES. WE ALSO FEEL THAT A CENTRAL EOF WILL HAVE NO IMPACT ON EMERGENCY OPERATIONS.

PLEASE LET US KNOW IF YOU REQUIRE ANY ADDITIONAL INFORMATION.

SINCERELY,

Emerson Tidd

EMERSON TIDD
LASALLE COUNTY
ESDA COORDINATOR



KANKAKEE COUNTY EMERGENCY SERVICES & DISASTER AGENCY

470 EAST MERCHANT STREET • ROOM 104
KANKAKEE, ILLINOIS 60901
815/937-3929

GENE M. CAVINS
DIRECTOR

Mr. Douglas J. Scott
Emergency Preparedness Director
1400 Opus Place
Downers Grove, Illinois 60515

Dear Mr. Scott:

Regarding your request to The Nuclear Regulatory Commission (NRC) to use a single, central Emergency Operations Facility (EOF), I feel this will not cause any problems at all to The Kankakee County ESDA operation.

I fully support your submittal to the (NRC) Nuclear Regulatory Commission.

Sincerely,

Gene M. Cavins

Gene M. Cavins
Kankakee County ESDA Director

OFFICE OF THE SHERIFF

KENDALL COUNTY 708-553-7500

1102 CORNELL LANE • YORKVILLE, IL 60560-9597

NOVEMBER 28, 1994

COMMONWEALTH EDISION
ATT: DOUGLAS SCOTT
EMERGENCY PREPAREDNESS
1400 OPUS PLACE
DOWNERS GROVE, IL. 60515

DEAR MR. SCOTT,

I AM RESPONDING TO YOUR LETTER OF NOVEMBER 1, 1994, REGARDING COMMONWEALTH EDISON'S REQUEST TO THE NUCLEAR REGULATORY COMMISSION (NRC) TO UTILIZE A SINGLE, CENTRAL EMERGENCY OPERATIONS FACILITY.

AS SHERIFF OF KENDALL COUNTY, I SUPPORT THIS CONCEPT FOR A SINGLE, CENTRAL EMERGENCY OPERATIONS FACILITY, FOR THE POINTS YOU HAVE GIVEN. NOT ONLY IN THE COST SAVINGS, BUT IN AN EFFORT TO HAVE MORE TIMELY AND ACCURATE INFORMATION IN DISSEMINATION OUT TO AGENCIES REQUIRED TO RESPOND OR TAKE ACTIONS, DURING INCIDENTS. FURTHERMORE, UTILIZING TECHNOLOGY NOT ONLY IN BEING EFFICIENT, BUT EFFECTIVE, RESULTING IN POSITIVE RESPONSES TO THE POTENTIAL DANGEROUS SITUATIONS. I FEEL THIS IS AN APPROPRIATE MOVE TO IMPROVE THE QUALITY OF THE SYSTEM THAT IS IN PLACE AND MAKE IT WORK FOR ALL EMERGENCY RESPONDERS.

IF THERE IS ANY OTHER INFORMATION YOU WOULD LIKE FROM ME, PLEASE DO NOT HESITATE TO CALL OR WRITE.

VERY TRULY YOURS,

Sheriff Richard A. Randall

SHERIFF RICHARD A. RANDALL
KENDALL COUNTY SHERIFF'S OFFICE

SHERIFF
Melvin C. Messer

CHIEF DEPUTY
Richard L. Wilkinson

ADMINISTRATION
& ENFORCEMENT
103 Jefferson Street
815-732-6666

OFFICE OF THE SHERIFF
OF OGLE COUNTY
Oregon, Illinois 61061

CORRECTIONS DIVISION
WARRANTS & CIVIL PROCESS
Fifth & Jefferson
815-732-2135

November 21, 1994

Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott,

In response to your letter dated November 1, 1994, please be advised that the Ogle County ESDA is in agreement with a central Emergency Operations Facility to be located in Downers Grove, IL.

With this EOF located in Downers Grove, we are proceeding with the understanding that the JPIC will remain in Dixon for our County.

Your continued support and cooperation is greatly appreciated.

Sincerely,

Melvin C. Messer
Ogle County Sheriff

MCM:rs

Clinton O. Grinnell
Sheriff

Gary Del Re
Undersheriff

OFFICE OF SHERIFF
DEPARTMENT OF EMERGENCY SERVICES

1303 North Milwaukee Ave.
Libertyville, IL 60048

Captain Thomas Gardner
County Coordinator
708/549-5230

November 4, 1994

Mr. Terry Blackmon
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Blackmon,

This letter is in response to your proposal to the Nuclear Regulatory Commission for a single, central Emergency Operations Facility.

I would like to go on record in support of your proposal. It seems to me that combining all your E.O.F.'s would be a more manageable, cost effective, and efficient way of addressing the Emergency Operations Facility's function, as it relates to my department's responsibilities under the Illinois Plan for Radiological Accidents.

I have always been curious as to why the Zion E.O.F. was located so close to the Zion Station. I've always thought it should at least be located outside the 10 mile emergency planning zone. In addition, it is irrelevant to me in the County's Emergency Operations Center whether we are talking to you in Zion or in Downers Grove, getting the information we need. I would also think that in a real incident the chances of telephones becoming unusable due to consumer overload would be far greater with the E.O.F. being in Zion as opposed to Downers Grove.

In closing, if I can be of any further assistance in this matter don't hesitate to contact me.

Sincerely,

Capt Thomas W. Gardner

Capt. Thomas W. Gardner
Lake County Emergency Services Coordinator

TWG:ek
comed941

County of Kenosha

ESTABLISHED
1850

November 29, 1994

Mr. Terry Blackmon
Governmental Affairs & Facilities
Emergency Preparedness & State Programs
Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

Dear Terry:

Kenosha County is in agreement with Commonwealth Edison's decision to establish a central EOF for its nuclear plants. We believe it will not hamper the emergency response efforts of Commonwealth Edison; it may, in fact, prove to be a benefit by moving the EOF out of the ten-mile EPZ.

Yours truly,

John R. Collins
County Executive

Paul M. Hess
Emergency Services Director

/gew

John R. Collins County Executive

912 - 56th Street
Kenosha, Wisconsin 53140

Phone: (414) 653-6536
FAX: (414) 653-6817

Emergency Services And Disaster Agency
Rock Island County Illinois

6120 78th Avenue
Milan, Illinois 61264
(309) 799-5166

November 4,1994

Mr. Terry Blackman
Commonwealth Edison Co.
Nuclear Regulatory Service
Emergency Preparedness
1400 Opus Place
Downers Grove, IL 60515

Dear Sir

I have read the document by Douglas J. Scott dated November 1, 1994.
The planned use of a single, Central Emergency Operation Facility (EOF) would not in anyway affect the operation of our facility. The combining of facilities seems to be a most prudent direction in which to proceed for savings and possible efficiency. I do not see any drawbacks or negatives to this plan.
I wish you well in this pursuit.

Sincerely,
Dave DeBarre
Dave DeBarre,
R.I.Co. ESDA Director

WHITESIDE COUNTY
E.S.D.A.

400 North Cherr
Morrison, IL 61
Tele 815/772-2800

EMERGENCY SERVICES AND DISASTER AGENCY

November 21, 1994

Mr. Terry Blackman
Governmental Affairs &
Facilities Supervisor
Emergency Preparedness
1400 Opus Place, Suite 500
Downers Grove, IL 60515

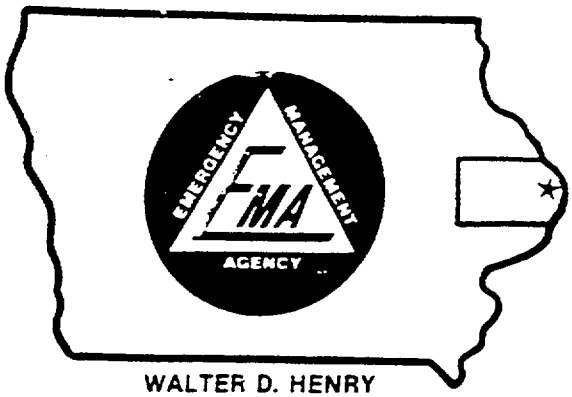
Dear Mr. Blackman,

In reference to your letter dated November 1, 1994, reference Commonwealth Edison centralizing their Emergency Operating Facility (EOF). We see no reason why the closing of the EOF in Morrison would have any negative effect on our operations in Whiteside County. The reasons stated for this action certainly make sense.

Sincerly,

Ron Hanson

Ron Hanson
Whiteside County ESDA Coordinator



WALTER D. HENRY
COORDINATOR

CLINTON COUNTY
EMERGENCY MANAGEMENT
CLINTON COUNTY LAW ENFORCEMENT CENTER
P.O. BOX 2957
CLINTON, IOWA 52733-2957
PHONE: (319) 242-5712

November 8, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place 5th Floor
Downers Grove, IL 60515

Dear Mr. Scott:

I have received your letter dated November 1, 1994 with regard to the centralization of a single Emergency Operations Facility, and have given consideration to the proposition.

I have conducted inquiries within Clinton County among those persons having a responsible role in supporting the Radiological Emergency Response Plan for the Quad Cities Nuclear Power Station, and have determined support exists for your proposal.

Please approach the NRC with your recommendation, confident with the support of Clinton County.

Sincerely,

Walter D. Henry

Walter D. Henry
Coordinator

WDH:SR

SCOTT COUNTY
EMERGENCY MANAGEMENT AGENCY
416 West 4 Street
Davenport IA 52801-1187

(319) 326-8663 FAX (319)322-2848

Bud Whitfield
Director

Serving...
Bettendorf
Blue Grass
Buffalo
Davenport
Dixon
Donahue
Eldridge
LeClaire
Long Grove
Maysville
McCausland
New Liberty
Panorama Park
Pleasant Valley
Princeton
Riverdale
Walcott

November 10, 1994

Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

RE: Your letter of November 1, 1994, consolidation of EOF facilities

Proximity to the EOF is not an issue for Scott County. We would have no objections to moving the facility to Downers Grove.

Sincerely,

Bud Whitfield, Director
Scott County Emergency Management Agency

BW/lj

Federal Emergency Management Agency
Region V
175 West Jackson Blvd, 4th Floor
Chicago, IL 60604

November 7, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

Dear Mr. Scott:

Thank you for your letter of November 2, 1994, regarding your proposal for a single, central Emergency Operations Facility (EOF). We reviewed the accompanying package and the responses of the States of Illinois, Iowa, and Wisconsin. We also reviewed the FEMA National Office response concerning your *interim* EOF operation.

The critical mission of the EOF in relation to offsite preparedness is the ability to monitor and communicate plant status and conditions, and make protective action recommendations (PAR) to offsite authorities. The Downers Grove facility has a computer network tie-in to the power stations, a node of the Nuclear Accident Reporting System (NARS) dedicated telephone, and the corporate decision-makers already in place. This capability is the key to the performance of the missions shown above.

In conclusion, we do not find that offsite preparedness would be adversely affected by a single, centrally-located EOF. In fact, it is possible that the consolidation of the EOF function at a single site may improve your interaction with offsite authorities.

Please contact Clay Spangenberg at (312) 408-5531 if you have any questions.

Sincerely,

Larry L. Bailey
Deputy Director, Preparedness,
Training and Exercises Division

cc:
FEMA Region VII
FEMA National Office
IEMA

Federal Emergency Management Agency
Region VII
911 Walnut Street, Room 300
Kansas City, MO 64106

NOV 30 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
Nuclear Regulatory Services
Emergency Preparedness & State Programs
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

SUBJECT: Proposed Central Emergency Operations Facility

We have completed a review of your proposal for a central Emergency Operations Facility (EOF) to be located in Downers Grove, Illinois. We also reviewed the responses from the State of Iowa and FEMA Region V and the FEMA National Office response concerning interim EOF operations.

Based on the above responses, our review of the offsite plans, and a tour of the proposed facility, it is our judgement that the proposed EOF contains more than adequate communications and computer capabilities to ensure that the critical EOF mission is performed as it applies to offsite authorities. It would serve as an acceptable facility to allow utility decision-makers to make appropriate protective action recommendations to the offsite authorities. We do not believe that offsite preparedness would suffer any adverse effects from consolidation to a central EOF facility.

If you have any questions, please contact Norman Valentine at (816) 283-7017 or Jane Young at (816) 283-7020.

Sincerely,

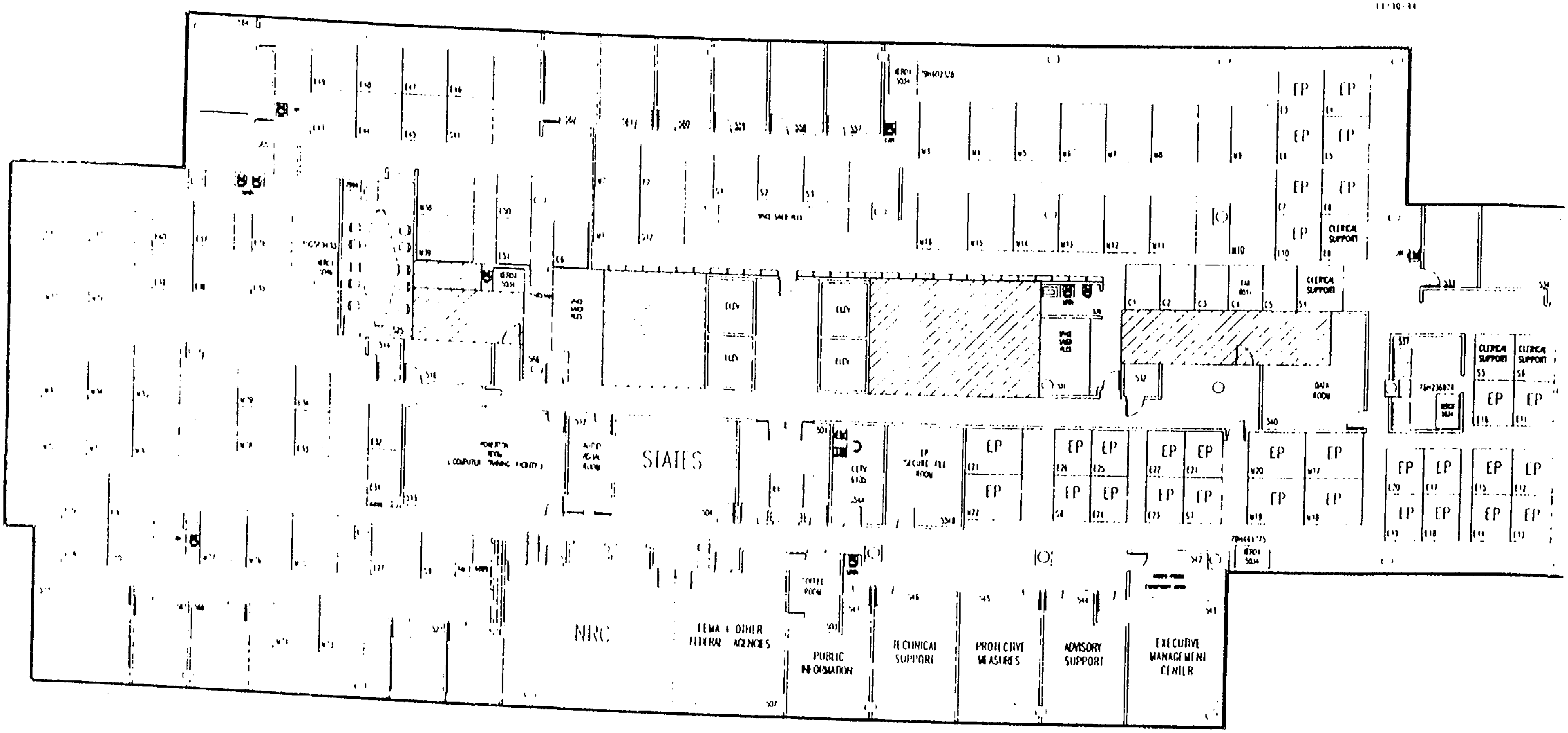
Robt G Bissell

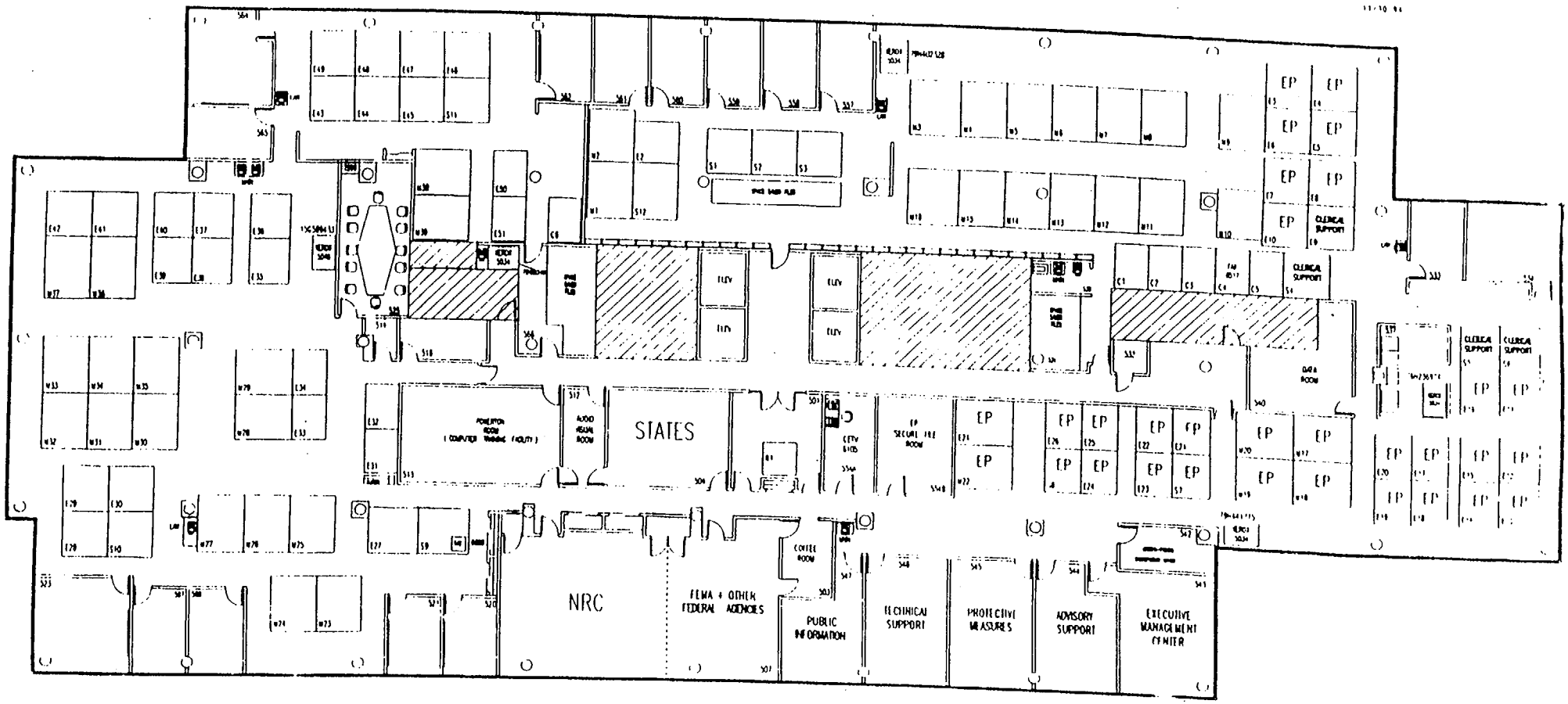
Robert G. Bissell, RAC Chairman/Chief
Training, Exercises, & Evaluation Branch

cc: Kathryn Cole, PT-EX-RG
Lawrence Bailey, FEMA V
Roland Lickus, NRC III

ATTACHMENT D

CENTRAL EOF FLOOR PLAN


STATES
NRC
FEMA + OTHER FEDERAL AGENCIES
PUBLIC INFORMATION
TECHNICAL SUPPORT
PROTECTIVE MEASURES
ADVISORY SUPPORT
EXECUTIVE MANAGEMENT CENTER
CLERICAL SUPPORT
DATA ROOM
ELEV
EP
EP SECURE FILE ROOM
COFFEE ROOM


STATES
NRC
FEMA + OTHER FEDERAL AGENCIES
COFFEE ROOM
PUBLIC INFORMATION
TECHNICAL SUPPORT
PROTECTIVE MEASURES
ADVISORY SUPPORT
EXECUTIVE MANAGEMENT CENTER
EP
CLERICAL SUPPORT

Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

March 31, 1993

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
NRC Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
"Submittal of Change Request Number 93-01 to the Commonwealth Edison Generic Generating Stations Emergency Plan (GSEP) for NRC Review and Approval"
NRC Docket Nos. 50-237/249; 50-254/265; 50-295/304; 50-454/455; 50-456/457

References: 1) NUREG/CR-073 - "Clarification of TMI Action Plan Requirements," Supplement 1, dated January 1985

2) Letter to Mr. A. Bert Davis (NRC) from D. Saccomando (CECo), dated September 29, 1992, "Submittal of Change Request 92-01 to Commonwealth Edison Generic Generating Station Emergency Plan for NRC Revision and Approval

Dear Mr. Davis:

Attached please find Change Request Number 93-01 to the Commonwealth Edison Generic Generating Stations Emergency Plan (GSEP) Manual. This change consists of those revisions associated with the use of our Corporate Emergency Operations Facility (CEOF), in Downers Grove, as an interim Emergency Operations Facility (EOF) which will fulfill the functions delineated in Reference 1 for an EOF until a nearsite EOF is activated. By proposing the use of the CEOF as an Interim EOF, Commonwealth Edison believes it will be capable of attaining the 1 hour "goal" identified in Reference 1. This proposed change also encompasses our previously proposed change to designate the CEOF as the backup EOF for Zion Station, which was submitted via Reference 2.

The enclosure contains:

1) A detailed Change Summary;

2) A section highlighting additions as "Redline" and deletions as "strike outs";

3) A section containing the text as it will be incorporated into the GSEP.

These changes have been reviewed in accordance with Commonwealth Edison practices by the Onsite and Off-site Safety Review groups. These changes are not in conflict with applicable FSARs or Technical Specifications. Pursuant to 10 CFR 50.54(q). These changes do not decrease the effectiveness of the overall GSEP.

Attachment A details CECo's philosophy supporting the proposed changes.

As stated in Reference 2, the proposed use of the CEOF as the backup EOF for Zion Station will not be implemented until receipt of NRC approval. The changes as written in the enclosure will also not be formally incorporated into the GSEP until receipt of NRC approval.

Please direct any questions you may have regarding this matter to Ms. Irene Johnson, Emergency Preparedness and State Programs (EPSP) Director at (708) 663-2096 or Ms. Leslie E. Holden, EPSP Supervisor at (708) 663-6673.

Very truly yours,

D. Saccomando
Nuclear Licensing

Attachment

Enclosure

cc: R. Emch - NRR
R. Pedersen - NRR
C. Pederson - NRC Region III
J. McCormick-Barger - NRC Region III
NRC Resident Inspector - Dresden, w/o enclosure
NRC Resident Inspector - Braidwood, w/o enclosure
NRC Resident Inspector - Byron, w/o enclosure
NRC Resident Inspector - Zion, w/o enclosure
NRC Resident Inspector - Quad Cities, w/o enclosure
NRC Resident Inspector - LaSalle, w/o enclosure
NRC Document Control Desk

APR 2 1993

ZNLD/2568/2

ATTACHMENT A

During an inspection last year, NRC Region III inspectors identified a concern regarding CECo's ability to staff off-site emergency response facilities (i.e. Emergency Operations Facilities, or EOFs), within the one hour goal specified in Reference 1. Edison has examined its options to address the one hour facility staffing goal with the intent of relieving the Technical Support Center (TSC) of off-site interface responsibilities. Our approach involves staffing a corporate EOF within the one hour goal while a nearsite EOF is being staffed. This concept has been discussed in several meetings between Commonwealth Edison, NRC Region III & NRR Staff.

The interim EOF approach is consistent with Edison's past use of the Corporate Command Center (CCC). The Corporate Command Center was an integral element of the Generating Station Emergency Plan (GSEP), was utilized in the past during normal work hours. The threshold for activation of the CEOF as an interim EOF has been lowered from site area emergency to those ALERTs which present radiological release or reactor safety consequences. As a result of this review, a new CEOF organization was designed which is capable of assuming those duties identified in the NUREG as being fulfilled by an emergency off-site facility. This change is also reflected in the nearsite EOF minimum staffing.

This change also addresses the use of the CEOF as a backup EOF if the nearsite EOF should become unavailable. When functioning as a backup EOF, full EOF staffing will be assigned and standard EOF procedures will be used. The CEOF has been designed to accomodate a staff of this size.

The CEOF can be expected to be staffed off hours within the one hour goal (55 to 75 minutes) after a callout initiation. This activation time is consistent with TSC staffing times. Once staffed, the CEOF may assume "Command and Control" from the TSC at the discretion of the Station Director and the Manager of Emergency Operations (CEOF).

CECo continues to make best faith efforts to reduce the staffing times to its nearsite EOF's. Work to date has included the use of dedicated augmentation callers which decrease the amount of time needed to contact emergency responders. Individuals are being prioritized based on quickest off hours response times, to a given EOF. The response time information has been modelled to determine the effectiveness of these changes. Edison will provide the results of the resultant sensitivity analysis derived from the model under separate cover. Subsequent augmentation drills will be conducted to validate the effectiveness of these changes.

The proposed changes do not decrease the effectiveness of the GSEP and do not result in a reduction to public health or safety. CECo has implemented the use of the CEOF as an interim EOF in our efforts to provide the most timely response to a GSEP classified event. The use of the CEOF as an interim EOF allows for the deployment of maximum station resources to the emergency situation.

GSEP-93-01
Change Summary

This revision to the GSEP redefines the use and modifies the staffing philosophy of the Corporate Emergency Operations Facility (CEOF), revises Staffing of the CEOF and EOF, and introduces the Significant Alert designation to activate the CEOF.
Page references in this change summary represent Revision 7A page numbering.

Section	Page	Description
0.0	0-5	2.28 PRECAUTIONARY ACTIVATION deleted since it is unnecessary with modified CEOF staffing philosophy. SIGNIFICANT ALERT added to list of Section 2 Definitions and designated 2.37. Defined terms renumbered between 2.28 and 2.37. (Source GSEP-93-01)
0.0	0-7	Added CEOF to title of Technical Communicator (CEOF/EOF). (Source GSEP-93-01)
0.0	0-8	4.3-3, 4 deleted "Corporate" from titles to eliminate the inference that these positions may only be filled with corporate personnel. 4.3-5 changed to Technical Specialist (CEOF) 4.3-6 changed to Protective Measures Director (CEOF) 4.3-7 changed to Health Physics/Environmental Specialist (CEOF) 4.3-8 changed to Advisory support Manager (CEOF) 4.3-9 changed to Emergency Planner (CEOF) 4.3-10 changed to Intentionally Blank The above changes are made to reflect the CEOF staffing titles discussed in Section 4 and carried throughout the GSEP. 4.3-10 is left blank to retain the numbering of the subsequent EOF and ENC organization numbers. (Source GSEP-93-01)
0.0	0-9	4.3-39 deleted "Corporate" from title to eliminate the inference that this position may only be filled by Corporate personnel. (Source GSEP-93-01)
2.0	2-6	2.28 PRECAUTIONARY ACTIVATION deleted since it is unnecessary with modified CEOF staffing philosophy. 2.29 through 2.32 renumbered. Previous 2.34 moved to this page and renumbered 2.33. (Source GSEP-93-01)
2.0	2-7	2.34 through 2.37 renumbered. SIGNIFICANT ALERT added as 2.37. (Source GSEP-93-01)
3.1.2	3-4	Section revised to reflect the activation of the CEOF as an interim facility with the capability to assume command and control until such time as the EOF is staffed and prepared to take overall responsibility for the event. The decision process and criteria for determining when and if the CEOF assumes command and control is specified in the CEPIPs. (Source GSEP-93-01) The reference to the Command Center in the Edison Building has been removed and a reference to the CEOF has been inserted in its place, with respect to what facility serves as a Backup EOF for Zion Station. (Source GSEP-92-01)

3.4.4	3-7	Section revised to CEOF funct[illegible] before and after the EOF is activated. (Source GSEP-93-01) The reference to the Command Center in the Edison Building has been removed and a reference to the CEOF has been inserted in its place, with respect to what facility serves as a Backup EOF for Zion Station. (Source GSEP-92-01)
3.4.5	3-7	Paragraph concerning the use of an EOF as a Backup EOF for an inoperative facility has been changed to mandate the use of the CEOF as a Backup EOF for Zion Station rather than the Command Center located in the Edison Building. (Source GSEP-92-01)
4.2	4-7	Added CEOF to title of Technical Communicator (To CEOF/EOF). (Source GSEP-93-01)
4.2	4-10	Deleted references to Corporate MEO in the first four bullets indicating that information is to be passed to the MEO whether the position is at the CEOF or EOF. (Source GSEP-93-01)
4.2	4-18	Added CEOF to title. Last two bullets revised to reflect the Technical Specialist (CEOF) and the CEOF as communications links. (Source GSEP-93-01)
4.2	4-25	Rephrased the sixth bullet to indicate it is not expected that the CEOF will take control of the Environmental Field Teams. (Source GSEP-93-01)
4.2	4-29	Changed MEO title in the sixth bullet item. Corrected title of Access Control Coordinator. (Source GSEP-93-01)
4.3	4-30	Third paragraph revised to reflect the differences in activation and staffing of the EOF and CEOF. Corporate Manpower/Logistics Director deleted from second note to reflect deletion of this position. NDO added as a point of contact. (Source GSEP-93-01)
4.3.1	4-31	Section revised to reflect the CEOF activation, command and control and organization. Item 7 deleted as not applicable, item 8 included in item 4 and therefore deleted. Organization titles and table numbers changed to reflect new positions. List of specific functions NOT taken by the CEOF added.
4.3	4-32	CEOF Organization chart revised to reflect new organization and titles. (Source GSEP-93-01)
4.3	4-34	Deleted 1)e. No longer applicable. Added actions for a Significant Alert and the responsibility to interface with the ERP from the deleted Corporate Manpower/Logistics Director (CEOF) position. (Source GSEP-93-01)
4.3	4-35	Revised 3)a. and NOTE to indicate activation of the CEOF is no longer discretionary. Deleted reference to deleted NOD. Added the NDO's CEPIP to the last paragraph as reference to the NDO's duties and responsibilities. (Source GSEP-93-01)

4.3	4-36	Deleted "Corporate" from title and revised responsibilities to reflect the revised CEOF organization. Deleted bullet item to minimize damage to the plant because the focus of the CEOF is external to plant actions. (Source GSEP-93-01)
4.3	4-37	Deleted "Corporate" from title and revised responsibilities to reflect the revised CEOF organization.
4.3	4-38	Moved PMD to Table 4.3-6. Added Technical Specialist (CEOF) description of responsibilities. (Source GSEP-93-01)
4.3	4-39	Deleted the position of Corporate Health Physics Director. Position responsibilities reassigned to the Protective Measures Director (CEOF). Deleted "Corporate" from title and revised PMD responsibilities to reflect the revised CEOF organization. (Source GSEP-93-01)
4.3	4-40	Moved ASM to Table 4.3-8. Labeled page INTENTIONALLY BLANK. (Source GSEP-93-01)
4.3	4-41	Deleted Corporate Governmental Support Director (CEOF) position. Position responsibilities reassigned to the Advisory Support Manager (CEOF). Added Health Physics/Environmental Specialist (CEOF) position and description of responsibilities. (Source GSEP-93-01)
4.3	4-42	Deleted Corporate Manpower/Logistics Director (CEOF) position. Position responsibilities reassigned to the Nuclear Duty Officer and Emergency Planner (CEOF). Deleted "Corporate" from title and revised ASM responsibilities to reflect the revised CEOF organization. (Source GSEP-93-01)
4.3	4-43	Continued deletion of the Corporate Manpower/Logistics Director (CEOF) position. Added Emergency Planner (CEOF) position and description of responsibilities. (Source GSEP-93-01)
4.3	4-44	Deleted the position of Corporate Communications Director (CEOF). Page designated "Intentionally Blank" to preserve the Table numbering for the EOF and ENC organizations. (Source GSEP-93-01)
4.3	4-45	Deleted reference to the Corporate Manpower/Logistics Director. Position was eliminated. Added the NDO as a coordination contact. (Source GSEP-93-01)
4.3	4-46	Deleted statement indicating that CEOF staff may relocate to the EOF. The CEOF staff will now remain at the CEOF.
4.3	4-51	Deleted "Corporate" from TSM title and added (CEOF) for clarity. (Source GSEP-93-01)
4.3	4-62	Fifth bullet: Deleted "Corporate" from PMD title and added (CEOF) for clarity. Clarified wording. (Source GSEP-93-01)
4.3	4-63	First Bullet: Deleted Corporate HPD, position was deleted. (Source GSEP-93-01)

4.3	4-65	Fifth Bullet: Clarified wording to be consistent with GSEP usage of PARs. (Source GSEP-93-01)
4.3	4-71	Fourth Bullet: Deleted "Corporate" from ASM title and added (CEOF) for clarity. (Source GSEP-93-01)
4.3	4-77	Deleted "Corporate" from the title and added (CEOF) for clarity. Change was made to eliminate the inference that the position is filled by Corporate personnel. (Source GSEP-93-01)
4.3	4-80	First Bullet: Deleted second sentence which referenced a position that is deleted. (Source GSEP-93-01)
4.4.2	4-101	Revised wording to be consistent with GSEP usage of EALs and PARs. (Source GSEP-93-01)
4.4.5	4-109	CEOF Staffing Revised to reflect revised titles and new positions. NOTE added above the EOF Minimum Staffing to describe minimum staffing position filling philosophy. Revised EOF Minimum Staffing positions to reflect enhancement of responsibility distribution. (Source GSEP-93-01)
4.4.6	4-109	Deleted responsibility to contact the DOE. Moved responsibility for issuing KI to 4). (Source GSEP-93-01)
4.7.4	4-116	Revised last paragraph to reflect notification of the DOE is the responsibility of the affected State(s). (Source GSEP-93-01)
6.1.1	6-3	Revised NOTE to indicate that the TSC will maintain NRC notification responsibilities until the EOF is in Command and Control. (Source GSEP-93-01)
6.1.3	6-15	Table 6.1-1, 1)c.Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
6.1.3	6-17	Table 6.1-2, 1)c.Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
6.1.3	6-18	Table 6.1-2, Corrected clerical errors and added NOTE to indicate activating the CEOF when an Alert is declared on a Significant Alert EAL. Deleted 3)b. and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
6.1.3	6-19	Table 6.1-3, 1)c.Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
6.1.3	6-20	Table 6.1-3, Corrected clerical error and revised to indicate that CEOF activation is not optional. Deleted 3)b and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
6.1.3	6-21	Table 6.1-4, 1)c.Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)

6.1.3	6-22	Table 6.1-4, Corrected clerical error and revised to indicate that CEOF activation is not optional. Deleted 3)b and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
6.1.3	6-23	Revised MEO title to include CEOF or EOF. (Source GSEP-93-01)
7.1.4	7-4	Revised to reflect enhanced use of the CEOF as an interim facility and to clarify that the CEOF is no longer discretionary. (Source GSEP-93-01) Section on the Corporate EOF has been changed to designate the CEOF as the official Backup EOF for Zion Station. The sentence designating the Command Center in the Edison Building as the official Backup EOF has been deleted. (Source GSEP-92-01)
7.1.5	7-5	Statement concerning Zion EOF habitability has been expanded to reiterate the existence of a Backup EOF in Downers Grove, should the nearsite EOF become uninhabitable. (Source GSEP-92-01)
7.2.2	7-7	The "NOTE" preceding the description of EOF communications capabilities has been deleted. When this section was written, the CEOF did not have access to the Commonwealth Edison microwave system. The facility now has full access to the system, providing redundancy in communications (both voice and data) as well as Party Lines (PLs) and a functional GSEP Radio Console to direct the activities of environmental monitoring teams. When operating as a Backup EOF for Zion Station, the CEOF microwave lines may be transferred from the nearsite EOF in two stages, thus facilitating a smooth transition between the facilities. (Source GSEP-92-01)

The Following Section

Depicts the Additions in

Redline and the Deletions

in Strikeout

GSEP REVISION 7 CONTENTS (Page 1 of 2)

REVISION #	REVISION DATE	EFFECTIVE DATE
7	JUNE 1990	MARCH 1991
7A	MAY 1992	JULY 15 1992
7B	[UPON GSEP-92-01 AND GSEP-93-01 APPROVAL]	

GSEP PAGE #	REVISION #
0-1 through 0-1a	GSEP-93-01
0-2	7
0-3 through 0-4	7A
0-5	GSEP-93-01
0-6	7
0-7 through 0-9	GSEP-93-01
0-10 through 0-16	7
0-17	7A
0-18 through 0-25	7
SECTION 1.0	7
SECTION 2.0	
2-1 through 2-5	7
2-6 through 2-7	GSEP-93-01
2-8	7
SECTION 3.0	
3-1 through 3-3	7
3-4	GSEP-92/93-01
3-5 through 3-6	7
3-7	GSEP-92/93-01
3-8	7
SECTION 4.0	
4-1 through 4-5	7
4-6	7A
4-7	GSEP-93-01
4-8 through 4-9	7
4-10	GSEP-93-01
4-11 through 4-17	7
4-18	GSEP-93-01
4-19 through 4-24	7
4-25	GSEP-93-01
4-26 through 4-28	7
4-29 through 4-32	GSEP-93-01
4-33	7
4-34 through 4-46	GSEP-93-01
4-47 through 4-48	7A
4-49 through 4-50	7
4-51	GSEP-93-01
4-52 through 4-61	7
4-62 through 4-63	GSEP-93-01
4-64	7
4-65	GSEP-93-01
4-66 through 4-70	7
4-71	GSEP-93-01
4-72 through 4-76	7
4-77	GSEP-93-01
4-78 through 4-79	7
4-80	GSEP-93-01
4-81 through 4-84	7
4-85	7A
4-86	7
4-87	7A
4-88 through 4-100	7
4-101	GSEP-93-01
4-102 through 4-108	7
4-109	GSEP-93-01
4-110 through 4-112	7
4-113	7A
4-114 through 4-115	7
4-116	GSEP-93-01
4-117 through 4-129	7
SECTION 5.0	7
SECTION 6.0	
6-1	7
6-2	7A
6-3	GSEP-93-01
6-4 through 6-14	7
6-15	GSEP-93-01
6-16	7
6-17 through 6-23	GSEP-93-01
6-24	7
6-25	7A
6-26 through 6-28	7
6-29	7A
6-30 through 6-45	7
6-46	7A
6-47 through 6-48	7
6-49 through 6-50	7A
6-51 through 6-55	7
6-56	7A
SECTION 7.0	
7-1 through 7-3	7
7-4	GSEP-92/93-01
7-5	GSEP-92-01
7-6	7
7-7	GSEP-92-01
7-8 through 7-15	7
SECTION 8.0	
8-1 through 8-7	7
8-8	7A
8-9 through 8-13	7
8-14	7A
8-15	7

GSEP REVISION 7 CONTENTS (Page 2 of 2)

GSEP PAGE #	REVISION #
SECTION 9.0	
9-1	7
9-2	7A
9-3 through 9-5	7
SECTION 10.0	7

SECTION 2 (continued)

		Page Number
2.19	GSEP	2-4
2.20	HAZARDOUS MATERIAL	2-4
2.21	IMMINENT	2-5
2.22	MONTHLY	2-5
2.23	NON-ESSENTIAL SITE PERSONNEL	2-5
2.24	NUCLEAR STATION	2-5
2.25	OFFSITE	2-5
2.26	ONSITE	2-5
2.27	POTENTIAL	2-5
2.28	~~PRECAUTIONARY ACTIVATION~~ PROBABLE	2-6
2.29	~~PROBABLE~~ PROJECTED DOSE	2-6
2.30	~~PROJECTED DOSE~~ PROTECTED AREA	2-6
2.31	~~PROJECTED AREA~~ PROTECTIVE ACTION GUIDES (PAGs)	2-6
~~2.32~~	~~PROTECTIVE ACTION GUIDES (PAGs)~~	
2.32	PROTECTIVE ACTION RECOMMENDATIONS (PARs)	2-6
2.33	~~PROTECTIVE ACTION RECOMMENDATIONS (PARs)~~ PROTECTIVE ACTIONS	2-~~7~~ 6
2.34	~~PROTECTIVE ACTIONS~~ QUARTERLY	2-7
2.35	~~QUARTERLY~~ SEMI-ANNUAL	2-7
2.36	~~SEMI-ANNUAL~~ SHALL, SHOULD AND MAY	2-7
2.37	~~SHALL, SHOULD AND MAY~~ SIGNIFICANT ALERT	2-7
2.38	SITE BOUNDARY	2-7
2.39	STANDBY	2-7
2.40	THYROID BLOCKING AGENT	2-8
2.41	VITAL AREAS	2-8
2.42	VITAL EQUIPMENT	2-8
2.43	WEEKLY	2-8
2.44	WORST CASE METEOROLOGY	2-8

SECTION 4

	Page Number
4.0 ORGANIZATIONAL CONTROL OF EMERGENCIES	4-1
4.1 PLANT ORGANIZATION	4-2
4.1.1 STATION MANAGER	4-2
4.1.2 SUCCESSION OF AUTHORITY	4-2
4.1.3 INITIAL RESPONSE TO ALL EVENTS	4-2
4.1.3.1 SHIFT ENGINEER (ACTING STATION DIRECTOR)	4-3
4.1.3.2 STATION CONTROL ROOM ENGINEER (SCRE)/SHIFT TECHNICAL ADVISOR (STA)	4-4
4.1.3.3 ON SHIFT PERSONNEL	4-4
4.1.3.4 RADIATION PROTECTION PERSONNEL	4-4
4.1.3.5 CHEMISTRY	4-4
4.1.3.6 SECURITY	4-4
4.2 STATION EMERGENCY RESPONSE ORGANIZATION	4-5
4.2.1 TECHNICAL SUPPORT CENTER	4-6
4.2.2 OPERATIONAL SUPPORT CENTER (OSC)	4-6
(F)4.2-1 THE STATION EMERGENCY RESPONSE ORGANIZATION	4-8
(T)4.2-1 ACTING STATION DIRECTOR/STATION DIRECTOR	4-9
(T)4.2-2 ASSISTANT STATION DIRECTOR (TSC)	4-11
(T)4.2-3 STATE/NARS COMMUNICATOR (TSC)	4-12
(T)4.2-4 OPERATIONS DIRECTOR (TSC)	4-13
(T)4.2-5 CONTROL ROOM COMMUNICATOR (IN THE TSC)	4-1
(T)4.2-6 OPERATIONAL SUPPORT CENTER DIRECTOR (OSC)	4-15
(T)4.2-7 OPERATIONAL SUPPORT CENTER SUPERVISOR (OSC)	4-16
(T)4.2-8 TECHNICAL DIRECTOR (TSC)	4-17
(T)4.2-9 TECHNICAL COMMUNICATOR (TO CEOF/EOF)	4-18
(T)4.2-10 ENS COMMUNICATOR (TSC)	4-19
(T)4.2-11 TSC TECHNICAL STATUS BOARD RECORDER(S)	4-20
(T)4.2-12 ADMINISTRATIVE DIRECTOR (TSC)	4-21
(T)4.2-13 RADIATION PROTECTION DIRECTOR (TSC)	4-22
(T)4.2-14 CHEMISTRY DIRECTOR (TSC)	4-23
(T)4.2-15 HPN COMMUNICATOR (TSC)	4-24
(T)4.2-16 TSC ENVIRONS DIRECTOR (TSC)	4-25
(T)4.2-17 TSC ODCS SPECIALIST (TSC)	4-26
(T)4.2-18 MAINTENANCE DIRECTOR (TSC)	4-27
(T)4.2-19 STORES DIRECTOR (TSC)	4-28
(T)4.2-20 SECURITY DIRECTOR (TSC)	4-29

SECTION 4 (continued)

	Page Number
4.3 CORPORATE EMERGENCY RESPONSE ORGANIZATION	4-30
4.3.1 THE CEOF ORGANIZATION	4-31
(F) 4.3-1 THE CEOF ORGANIZATION	4-32
(T) 4.3-1 SYSTEM POWER SUPPLY OFFICE (SYSTEM POWER DISPATCHER)	4-33
(T) 4.3-2 NUCLEAR DUTY OFFICER (NDO)	4-34
(T) 4.3-3 ~~CORPORATE~~ MANAGER OF EMERGENCY OPERATIONS (CEOF)	4-36
(T) 4.3-4 ~~CORPORATE~~ TECHNICAL SUPPORT MANAGER (CEOF)	4-37
~~(T) 4.3-5 CORPORATE PROTECTIVE MEASURES DIRECTOR (CEOF)~~	~~4-38~~
(T) 4.3-5 TECHNICAL SPECIALIST (CEOF)	4-38
~~(T) 4.3-6 CORPORATE HEALTH PHYSICS DIRECTOR (CEOF)~~	~~4-39~~
(T) 4.3-6 PROTECTIVE MEASURES DIRECTOR (CEOF)	4-39
~~(T) 4.3-7 CORPORATE ADVISORY SUPPORT MANAGER (CEOF)~~	~~4-40~~
(T) 4.3-7 HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)	4-41
~~(T) 4.3-8 CORPORATE GOVERNMENTAL SUPPORT DIRECTOR (CEOF)~~	~~4-41~~
(T) 4.3-8 ADVISORY SUPPORT MANAGER (CEOF)	4-42
~~(T) 4.3-9 CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF)~~	~~4-43~~
(T) 4.3-9 EMERGENCY PLANNER (CEOF)	4-43
~~(T) 4.3-10 CORPORATE COMMUNICATIONS DIRECTOR (CEOF)~~	~~4-44~~
(T) 4.3-10 INTENTIONALLY BLANK	4-44
(T) 4.3-11 EMERGENCY RESTORATION OF POWER (ERP) DIRECTOR	4-45
4.3.2 THE EOF ORGANIZATION	4-46
(F) 4.3-2 THE EOF ORGANIZATION	4-48
(T) 4.3-12 MANAGER OF EMERGENCY OPERATIONS	4-49
(T) 4.3-13 ASSISTANT MEO (EOF)	4-50
(T) 4.3-14 TECHNICAL SUPPORT MANAGER (EOF)	4-51
(T) 4.3-15 TECHNICAL SUPPORT DIRECTOR (EOF)	4-52
(T) 4.3-16 SENIOR REACTOR OPERATOR (EOF)	4-53
(T) 4.3-17 WASTE SYSTEMS DIRECTOR (EOF)	4-54
(T) 4.3-18 DESIGN AND CONSTRUCTION SUPPORT DIRECTOR (EOF)	4-55
(T) 4.3-19 TECHNICAL INFORMATION COORDINATOR (EOF)	4-56
(T) 4.3-20 EOF STATUS BOARD RECORDERS (EOF)	4-57
(T) 4.3-21 TECHNICAL COMMUNICATOR (TO TSC)	4-58
(T) 4.3-22 ENS COMMUNICATOR (EOF)	4-59
(T) 4.3-23 SPDS/PTHSTY SPECIALIST (EOF)	4-60
(T) 4.3-24 PROTECTIVE MEASURES COORDINATOR (EOF)	4-61
(T) 4.3-25 PROTECTIVE MEASURES DIRECTOR (EOF)	4-62
(T) 4.3-26 HEALTH PHYSICS DIRECTOR (EOF)	4-63

SECTION 4 (continued)

		Page Number
	(T) 4.3-27 HPN COMMUNICATOR (EOF)	4-64
	(T) 4.3-28 ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)	4-65
	(T) 4.3-29 PROTECTIVE MEASURES COMMUNICATOR (EOF)	4-66
	(T) 4.3-30 EOF ENVIRONS DIRECTOR (EOF)	4-67
	(T) 4.3-31 GSEP RADIO COMMUNICATOR (EOF)	4-68
	(T) 4.3-32 EOF ODCS SPECIALIST (EOF)	4-69
	(T) 4.3-33 STATE ENVIRONS COORDINATOR(S)	4-70
	(T) 4.3-34 ADVISORY SUPPORT MANAGER (EOF)	4-71
	(T) 4.3-35 ADVISORY SUPPORT DIRECTOR (EOF)	4-72
	(T) 4.3-36 GOVERNMENTAL SUPPORT DIRECTOR (EOF)	4-73
	(T) 4.3-37 CECo EOC LIAISON(S)	4-74
	(T) 4.3-38 GOVERNMENTAL COMMUNICATOR(S) (EOF)	4-75
	(T) 4.3-39 ~~CORPORATE~~ EMERGENCY PLANNER (EOF)	4-77
	(T) 4.3-40 SAFEGUARDS SPECIALIST (EOF)	4-78
	(T) 4.3-41 ACCESS CONTROL COORDINATOR (EOF)	4-79
	(T) 4.3-42 MANPOWER/LOGISTICS DIRECTOR (EOF)	4-80
	(T) 4.3-43 COMMUNICATIONS DIRECTOR (EOF)	4-82
	(T) 4.3-44 COMPUTER SPECIALIST(S) (EOF)	4-83
4.3.3	THE EMERGENCY NEWS CENTER (ENC) ORGANIZATION	4-84
	(F) 4.3-3 EMERGENCY NEWS CENTER (ENC) ORGANIZATION WHEN CO-LOCATED EOF/JPIC IS ACTIVATED	4-86
	(F) 4.3-4 EMERGENCY NEWS CENTER (ENC) ORGANIZATION WHEN A REMOTE JPIC IS ACTIVATED	4-87
	(T) 4.3-45 PUBLIC INFORMATION MANAGER/ENC CORPORATE SPOKESPERSON (ENC)	4-88
	(T) 4.3-46 PUBLIC INFORMATION DIRECTORS (ENC)	4-89
	(T) 4.3-47 JPIC COORDINATOR (ENC)	4-91
	(T) 4.3-48 INFORMATION LIAISON (ENC)	4-92
	(T) 4.3-49 TECHNICAL ADVISORS (ENC)	4-93
	(T) 4.3-50 TECHNICAL SPOKESPERSON (ENC)	4-94
	(T) 4-3-51 H.P./ENVIRONMENTAL ADVISORS (ENC)	4-95
	(T) 4.3-52 H.P./ENVIRONMENTAL SPOKESPERSON (ENC)	4-96
	(T) 4.3-53 ENC RECORDER (ENC)	4-97
	(T) 4.3-54 NEWSWRITERS (ENC)	4-98
	(T) 4.3-55 MEDIA MONITORING COORDINATOR (ENC)	4-99
	(T) 4.3-56 RUMOR CONTROL COORDINATOR (ENC)	4-10

~~2.28 PRECAUTIONARY ACTIVATION~~

~~Precautionary Activation of an Emergency Response Facility (ERF) is when key Managers or Directors are called, without formal initiation of facility staffing per procedure, to report to an ERF for support purposes. The presence of Minimum Staffing, as described in Section 4, is neither intended or implied. A facility at Precautionary Activation may not assume Command and Control, nor is it intended that there be an upgrade in emergency classification as a result of any ERF being placed in Precautionary Activation.~~

~~2.29~~
2.28 PROBABLE

Supported by evidence strong enough to establish presumption but not proof; an event that is likely to occur; the probability that an event will occur is greater than or equal to 50%.

~~2.30~~
2.29 PROJECTED DOSE

That calculated dose commitment that some individuals in the population group may receive if no protective actions are implemented. Projected doses are calculated to establish an upper limit boundary.

~~2.31~~
2.30 PROTECTED AREA

That onsite area within the security boundary as defined in each station's Security Plan.

~~2.32~~
2.31 PROTECTIVE ACTION GUIDES (PAG)

Projected radiological dose or dose commitment values to individuals in the general population that warrant protective action.

Protective Action Guides are criteria used to determine if the general population needs protective action regarding projected radiological doses, or from actual committed (measured) dose values.

~~2.33~~
2.32 PROTECTIVE ACTION RECOMMENDATIONS (PARs)
Recommended actions to the States for the protection of the offsite public from whole body external gamma radiation, and inhalation and ingestion of radioactive materials. Typical PARs include recommendations for sheltering, evacuation, access control and other recommendations concerning the safeguards of affected food chain processes.

~~2.34~~
2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

~~2.35~~
2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

~~2.36~~
2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

~~2.37~~
2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 SIGNIFICANT ALERT

Those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5.

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

* The CEOF Organization
* The EOF Organization
* The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEOF) and~~/or~~ Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal State, and local authorities.

~~During the less serious emergencies, (i.e., Unusual Events or Alerts), the CEOF Organization may take responsibility for evaluating, coordinating, and directing the overall company activities involved in coping with the emergency. The CEOF Organization functions under a Corporate Manager of Emergency Operations and its responsibilities include command and control, intelligence, logistics, engineering support, medical care, manpower requirements, communications, accounting, legal, health physics, environmental, and news information. Activation of the CEOF will normally take place only during regular working hours (8:00 a.m. to 4:30 p.m, Monday thru Friday). The CEOF is located in the Downers Grove facility.~~
The CEOF will be activated at a Significant Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).

~~The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.~~
~~The command center located in the Edison Building serves as the backup EOF for Zion Station as described in Section 3.4.~~

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the ~~Corporate~~ Manager of Emergency Operations. ~~The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control.~~ Once the EOF Organization is activated, the CEOF Organization~~, if activated,~~ becomes support staff to the EOF. (See Section 4.0).

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the ~~Corporate~~ Manager of Emergency Operations (CEOF) ~~may~~ will direct a staff in evaluating~~,~~ and coordinating~~, and directing~~ the overall company activities involved with an emergency. ~~If the EOF Organization is activated at the EOF, then the CEOF Organization, if activated, shall report to the EOF Organization in a supporting role~~. Activation of the CEOF is ~~always optional~~ mandatory upon declaration of a Significant Alert, Site Emergency ~~or~~ General Emergency. When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. ~~The command center located in the Edison Building has been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required.~~ Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, ~~Corporate~~ Manager of Emergency Operations (CEOF) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove. ~~which shall use the command center located in the Edison Building.~~

Recommended organization and staffing for the OSC during extended emergency events (i.e., events lasting longer than twenty-four hours) are shown in figures included with this section.

NOTE

****
* The OSC shall remain activated during events classified as Site *
* Emergency and General Emergency. The OSC may be de-activated at *
* the Alert level if deemed unnecessary by the Acting Station *
* Director/Station Director. *
****

All Station Emergency Response Organization personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan. The major responsibilities and duties of these personnel are given in the following tables:

Table 4.2-1 - Acting Station Director/Station Director
Table 4.2-2 - Assistant Station Director
Table 4.2-3 - State/NARS Communicator
Table 4.2-4 - Operations Director
Table 4.2-5 - Control Room Communicator (in the TSC)
Table 4.2-6 - Operational Support Center Director
Table 4.2-7 - Operational Support Center Supervisor
Table 4.2-8 - Technical Director
Table 4.2-9 - Technical Communicator (to CEOF/EOF)
Table 4.2-10 - ENS Communicator
Table 4.2-11 - TSC Technical Status Board Recorders
Table 4.2-12 - Administrative Director
Table 4.2-13 - Radiation Protection Director
Table 4.2-14 - Chemistry Director
Table 4.2-15 - HPN Communicator
Table 4.2-16 - TSC Environs Director
Table 4.2-17 - TSC ODCS Specialist
Table 4.2-18 - Maintenance Director
Table 4.2-19 - Stores Director
Table 4.2-20 - Security Director

TABLE 4.2-1 (cont'd)

ACTING STATION DIRECTOR STATION DIRECTOR

PART B) STATION DIRECTOR (TSC) RESPONSIBILITIES WITH THE CORPORATE EOF OR EMERGENCY OPERATIONS FACILITY IN COMMAND AND CONTROL INCLUDE:

- o Keep the Manager of Emergency Operations (CEOF or EOF) ~~/Corporate MEO~~ and NRC informed as to the status of the plant.
- o Assist the MEO (CEOF or EOF) ~~/CMEO~~ in the acquisition of information for the NARS, NRC Event Notification Worksheet and State Agency Updates Checklist.
- o Provide information and recommendations to the MEO (CEOF or EOF) ~~/Corporate MEO~~.
- o Implement plans, procedures and schedules to meet emergency response objectives as directed by the MEO (CEOF or EOF) ~~/Corporate MEO~~.
- o Request from the Corporate Emergency Response Organization any additional material, manpower and equipment needed to implement response plans and operations.
- o Continue to supervise the Station Emergency Response Organization (i.e. Control Room, OSC and TSC).
- o Provide a station Senior Reactor Operator (SRO) for the EOF as requested by the MEO or Nuclear Duty Officer.
- o Maintain a record of GSEP related activities.

TABLE 4.2-9

TECHNICAL COMMUNICATOR (TO CEOF/EOF)

The TSC Communicators are responsible for transmitting/receiving information to and from the TSC.

General responsibilities assigned to all TSC Communicators include:

- Establish communications with appropriate parties as directed by the responsible Director.
- Transmit information that has been reviewed and/or approved by the responsible Director.
- Document time, date and information being transmitted or received on appropriate forms.
- Record and relay inquiries to responsible Directors and the responses to those inquiries.
- Assist appropriate Directors in maintaining proper records and logs of GSEP related activities.

SPECIFIC DUTIES ASSIGNED TO THE TECHNICAL COMMUNICATOR (TO CEOF/EOF) INCLUDE:

- Report to TSC Technical Director.
- Establish and maintain contact with the ~~EOF via Technical Support Party Line (PL 3) Phone or Station Extension. (Normally talks with the~~ Technical Specialist (CEOF) and/or the Technical Communicator at the EOF~~)~~.
- Provide CEOF/EOF with Plant Status Information as directed by the TSC Technical Director.

TABLE 4.2-16

TSC ENVIRONS DIRECTOR (TSC)

The TSC Environs Director reports to the Radiation Protection Director and supervises the activities of CECo Environmental Sampling Teams in an emergency. Once the EOF Environs Director has taken control of the Environmental Sampling Teams, the TSC Environs Director will continue to monitor offsite environmental data and will assist the Radiation Protection Director as deemed appropriate.

Responsibilities assigned to the TSC Environs Director include:

- o Supervise the activities of the ODCS Specialist.
- o Assemble one or more environmental monitoring teams, and track these individuals accumulated dose.
- o Dispatch and coordinate the activities of CECO Environmental Monitoring Teams. This includes:
  - -- Dose rate surveys (including plume tracking);
  - -- Air sampling;
  - -- Soil, water, and vegetation sampling;
  - -- Contamination surveys; and
  - -- Exchange of TLDs and filter cartridges from fixed environmental stations.
- o Accumulate, tabulate, and evaluate environmental and radiological data.
- o Request additional environmental personnel and/or equipment, as necessary. This includes:
  - -- Assistance for road blocks and security until State, County and Local personnel are available;
  - -- Obtain communications equipment as necessary. Telephones, mobile radios, and portable radios may be required;
  - -- Obtain required transportation for personnel; and
  - -- Obtain sufficient technical and nontechnical personnel to expand the operation as necessary.
- o Transfer command of the Environs Field Teams to the EOF~~/CEOF~~ Environs Director when appropriate. The Protective Measures Director (CEOF) may take command of the Environmental Field Teams if agreed upon by the MEO (CEOF) and the Station Director or the MEO (EOF).
- o Make appropriate Protective Action Recommendations for the public to the Radiation Protection Director.
- o Maintain a record of GSEP related activities.

TABLE 4.2-20

SECURITY DIRECTOR (TSC)

The Security Director maintains plant security and personnel accountability at the nuclear station. The Security Director shall report directly to the Station Director.

Responsibilities assigned to the Security Director include:

- Maintain plant security and account for all personnel within the protected area as necessary or required.
- Identify, for the Station Director, any nonroutine security procedures and/or contingencies that are in effect or that require a response.
- Expedite ingress and egress of key emergency response personnel, as required.
- Coordinate with the Radiation Protection Director in controlling ingress and egress to and from the protected area if radiological concerns are present.
- Provide for access control to the Control Room, TSC and OSC, as appropriate.
- Initiate security at the EOF and JPIC if it is requested by the ~~Corporate~~ MEO (CEOF) or the Station Director. It shall be the responsibility of the Security Director to contact an Access Control Coordinator and to notify the Corporate Nuclear Security Administrator. Access Control ~~Directors~~ Coordinators are listed in the GSEP telephone directory.
- Provide an escort and expedite ingress, as necessary, for NRC Site Team personnel in conjunction with the Radiation Protection Director.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Assist the Radiation Protection Director in determining personnel evacuation routes as necessary.
- Assist the Station Director in evaluating changes in security related Emergency Action Levels (EALs).
- Maintain a record of GSEP related activities.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

SECTION 4.3.1 CEOF Organization

SECTION 4.3.2 EOF Organization

SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECo's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Significant Alerts, Site and General Emergencies. CEOF activation for other Alerts or Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEOF) ~~deems appropriate~~.

NOTE:

The roles of the System Power Supply Office and the Nuclear Duty Officer are unique in that they may be considered as parts of the overall Corporate Emergency Response, but do not hold specifically identified positions within the CEOF Organization, the EOF Organization, or the ENC Organization. For a description of their general responsibilites as they pertain to the GSEP, refer to the following referenced Tables:

- Table 4.3-1 System Power Supply Office
- Table 4.3-2 Nuclear Duty Officer

NOTE:

The Emergency Restoration of Power (ERP) Director is a position that coordinates with the Corporate Emergency Response Organization. The ERP Director works with the Nuclear Duty Officer when the CEOF is activated and the Manpower/Logistics Director (EOF) when the EOF is activated, ~~or Corporate Manpower/Logistics Director as determined by the facility in Command and Control.~~ This organizational relationship is depicted on the Organization charts by a dotted line. For a description of the general responsibilities of the ERF Director as they pertain to the GSEP, refer to the following referenced Table:

- Table 4.3-11 ERP Director

4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control ~~the same emergency response actions and functions as the EOF Organization~~, there are several factors differentiating ~~these two~~ the CEOF and EOF Organizations:

1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.

2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.

3) The CEOF would likely be the CECo facility utilized during daytime hours for Corporate Response to Transportation Accidents.
(This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).

4) The CEOF Organization ~~would normally~~ shall be activated ~~during daytime work hours, Monday through Friday~~ when a Significant Alert, a Site Emergency or a General Emergency is declared.

5) The CEOF may assume ~~the~~ nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies ~~if~~ until the EOF ~~has not yet been activated~~ is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEOF) and Station Director.

6) ~~If~~ When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, ~~which will assume~~ after Command and Control ~~of the response~~ is transferred to the EOF.

7) ~~The CEOF Organization's staffing requirements are more flexible regarding its function of either taking Command and Control or acting in a support role only.~~
The CEOF should not assume ENS/HPN communications responsibilities

8) ~~The criteria for activation and use of the CEOF Organization is always discretionary, while activation of the EOF Organization is required for certain events~~.

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3 ~~CORPORATE~~ MANAGER OF EMERGENCY OPERATIONS (CEOF)
Table 4.3-4 ~~CORPORATE~~ TECHNICAL SUPPORT MANAGER (CEOF)
~~Table 4.3-5 CORPORATE PROTECTIVE MEASURES DIRECTOR (CEOF)~~
Table 4.3-5 TECHNICAL SPECIALIST (CEOF)
~~Table 4.3-6 CORPORATE HEALTH PHYSICS DIRECTOR (CEOF)~~
Table 4.3-6 PROTECTIVE MEASURES DIRECTOR (CEOF)
~~Table 4.3-7 CORPORATE ADVISORY SUPPORT MANAGER (CEOF)~~
Table 4.3-7 HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)
~~Table 4.3-8 CORPORATE GOVERNMENTAL SUPPORT DIRECTOR (CEOF)~~
Table 4.3-8 ADVISORY SUPPORT MANAGER (CEOF)
~~Table 4.3-9 CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF)~~
Table 4.3-9 EMERGENCY PLANNER (CEOF)
~~Table 4.3-10 CORPORATE COMMUNICATIONS DIRECTOR (CEOF)~~
Table 4.3-10 INTENTIONALLY BLANK

FIGURE 4.3-1

THE CEOF ORGANIZATION

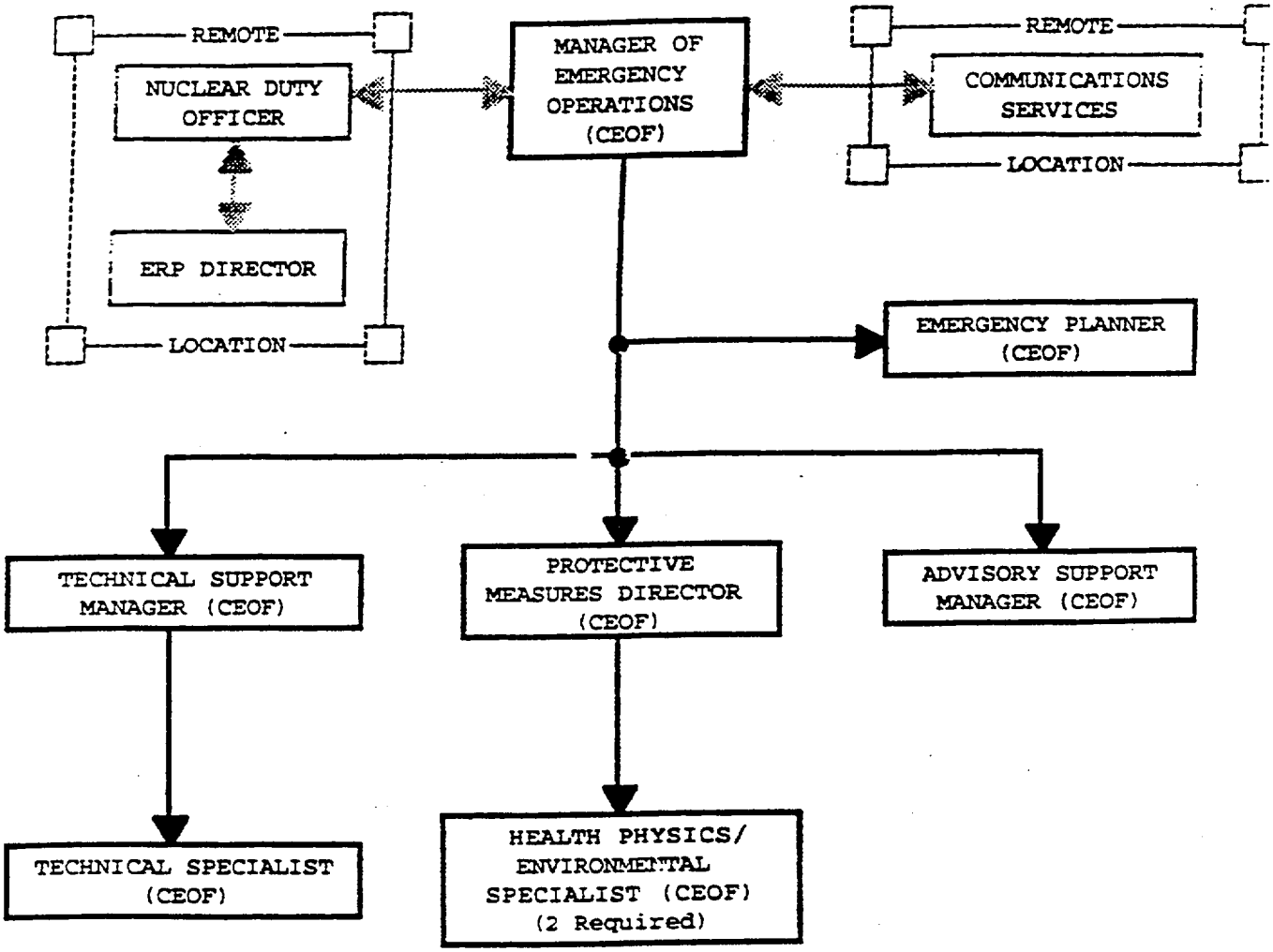


TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECo individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.

b. Verify that all appropriate notifications have been made.

c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.

d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.

~~e. If the event has the potential for escalation to a Site or General Emergency, or at the NDO's discretion the NDO shall:~~

~~* Consider establishing Access Control at the affected Station's EOF and JPIC.~~

~~* Notify the Corporate Emergency Preparedness Department to prepare the EOF for activation.~~

~~* Initiate call to place the EOF Organization on standby status, per the GSEP telephone directory call tree. (This may involve notification of the EOF minimum staff personnel.)~~

~~f~~ e. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.

~~g~~ f. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

a. Complete all actions as listed above in part 1).

b. Notify ANI and INPO within eight (8) hours of event classification.

c. If the Alert Classification is determined to be a Significant Alert, activate the CEOF Organization.

d. When the CEOF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.

3) ACTIONS FOR SITE AND GENERAL EMERGENCIES

a. Activate the Corporate Emergency Response Organization (CEOF and~~/or~~ EOF and ENC Organizations). ~~This is a procedural requirement.~~ The NDO's responsibilities shall include all the ~~other required and discretionary~~ actions identified in 1) and 2) above.

b. Notify the Communications Services Duty Officer (CSDO) and prior to the activation of the Emergency News Center Organization, review any news releases for accuracy.

4) ACTIONS FOR A TRANSPORTATION ACCIDENT

a. Complete actions a, b and ~~f~~ g as listed above in part 1).

b. Notify ANI and INPO within eight (8) hours of the accident.

c. Maintain a record of activities.

NOTE:

```
**********************************************************************
* The NDO's function is to determine the degree of Corporate         *
* assistance required to control and mitigate emergency events.      *
* Additionally, it is the NDO's responsibility to initiate           *
* Corporate assistance, by activating those parts of the             *
* Corporate Emergency Response Organization, (CEOF and/or EOF        *
* and ENC Organizations), which the NDO deems appropriate or         *
* are required by Company procedures.                                *
**********************************************************************
```

For more specific duties and responsibilities of the NDO in regards to response to generating station and utility emergencies, refer to the current ~~Nuclear Operations Directive (NOD) addressing the NDO's actions~~ NDO's Corporate Emergency Plan Implementing Procedure (CEPIP).

TABLE 4.3-3

~~CORPORATE~~ MANAGER OF EMERGENCY OPERATIONS (CEOF)

The ~~Corporate~~ MEO (~~CMEO~~ CEOF), when in Command and Control, will direct CECo's Emergency Response activities until such time when (and if) the EOF Organization assumes Command and Control. ~~After~~ When the EOF Organization assumes Command and Control, the ~~CMEO~~ (CEOF) and Staff ~~become~~ will remain in-place as a support group ~~to~~ for the Manager of Emergency Operations (EOF).

~~When the TSC has Command and Control, assume the ongoing~~ Responsibilities assigned to the ~~CMEO~~ (CEOF), including ~~(if in Command and Control of the Emergency Response)~~:

- Direct the CEOF Organization shown in Figure 4.3-1 and coordinate all CECo activities involved in coping with the emergency~~, determine staffing needs as appropriate~~.
- ~~Approve the technical content of CECo press releases prior to their being released to the media.~~ Coordinate CECo press releases with the Nuclear Duty Officer and Communications Services, as appropriate.
- Request assistance from non-CECo emergency response organizations, as required.
- Evaluate the need, based on events in progress, to staff the EOF to provide additional support to the Station.
- Maintain a record of the GSEP related activities.

When the CEOF assumes Command and Control, assume the additional responsibilities assigned to the MEO (CEOF) including:

- All nondelegable responsibilites of Command and Control as delineated in Section 4.4.6 of this plan.
- Ensure State Agency Update ~~Forms~~ Checklists are ~~approved prior to transmittal~~ completed and transmitted on an hourly basis.
- Approve the contents of the NARS form prior to transmittal.
- Notify appropriate ~~Federal,~~ State~~,~~ and local agencies of emergency conditions in accordance with Section 6.0 of this plan.
- Ensure that appropriate measures are taken Onsite to:
  - -- Terminate the condition causing the emergency.
  - -- Protect employees and the public.
  - ~~-- Minimize damage to the plant.~~
  - -- Effect post accident recovery and deactivate the Emergency Response Organization when appropriate.

~~o Maintain a record of GSEP related activities.~~

After the EOF Organization ~~has assumed~~ assumes Command and Control:

- Remain at the CEOF and provide assistance to the Station Director and Manager of Emergency Operations (EOF) ~~, as requested~~.

~~o Direct the CEOF Organization shown in Figure 4.3-1.~~

~~o Maintain a record of GSEP related activities.~~

TABLE 4.3-4

CORPORATE TECHNICAL SUPPORT MANAGER (CEOF)

The Corporate Technical Support Manager (TSM CEOF) reports to the CMEO (CEOF) at the CEOF. The Corporate TSM (CEOF) will direct the activities of the Technical Specialist (CEOF) and will coordinate the engineering services necessary for plant modifications, special equipment arrangement, shielding, containers, or other devices needed during the emergency. When the EOF Organization assumes Command and Control, the Corporate TSM (CEOF) will functionally report to the Technical Support Manager at the EOF (EOF).

Responsibilities assigned to the Corporate TSM Technical Support Manager (CEOF) (prior to the EOF Organization assuming Command and Control) include:

- Provide recommendations for changes in Emergency Action Level classification to the CMEO (CEOF) and participate in the decision making process.
- Provide the CMEO with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- Assist the CMEO in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- Assist in the development of post-accident recovery measures.
- ~~Provide technical information on the facility design.~~
- ~~Ensure that modifications needed for plant recovery are implemented in a timely manner.~~
- ~~Enlist the aid of consultants as necessary.~~
- ~~Determine the Corporate TSM's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- Advise the MEO (CEOF) of the need to staff the EOF based on degrading plant conditions.
- Maintain a record of GSEP related activities.

~~When the EOF Organization has assumed Command and Control, the Corporate TSM shall perform activities similar to those listed above, except that they shall be done in coordination with and in support of the Technical Support Manager who is located at the EOF.~~

TABLE 4.3-5

~~CORPORATE PROTECTIVE MEASURES DIRECTOR (CPDF)~~

~~The Corporate Protective Measures Director (PMD) reports to the CMEO and is responsible for coordinating all offsite sampling/monitoring activities of CECo personnel and for interfacing with State personnel regarding dose assessment programs. When the EOF Organization assumes Command and Control, the Corporate PMD shall serve as a support individual for the Protective Measures Director at the EOF.~~

~~Responsibilities assigned to the Corporate Protective Measures Director (prior to the EOF Organization assuming Command and Control) include:~~

- ~~Direct the environmental sampling activities of the TSC Environs Director.~~
- ~~Direct the activities of the Corporate Health Physics Director.~~
- ~~Coordinate the environmental contractor's assistance in the collection of environmental data.~~
- ~~Cooperate with the Illinois Department of Nuclear Safety (and contiguous State agencies) in the implementation of an offsite dose assessment counterpart program.~~
- ~~Based on environmental sampling or known plant releases, calculate projected dose values for affected areas; based on these projections, advise the CMEO of protective action recommendations for plant personnel and members of the public.~~
- ~~Assist the CMEO in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.~~
- ~~Determine the Corporate Protective Measures Director's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~Maintain a record of CSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, the Corporate Protective Measures Director shall obtain information and perform activities in support of the Protective Measures Director located at the EOF.~~

TABLE 4.3-5

TECHNICAL SPECIALIST (CEOF)

The Technical Specialist (CEOF) is responsible for obtaining and disseminating plant condition and status information in the CEOF. The Technical Specialist (CEOF) reports to the Technical Support Manager (CEOF).

Responsibilities assigned to the Technical Specialist (CEOF) include:

- Ensure that critical parameters are identified and trended utilizing the Safety Parameter Display System (SPDS), Point History (PTHSTY) and Point Trend programs.
- Advise the TSM (CEOF) of changes in Emergency Action Level (EAL) classification based on plant conditions or parameters.
- Establish contact with the Technical Communicator (TC CEOF/EOF).
- Obtain plant status information.
- Maintain a record of GSEP related activities.

TABLE 4.3-6

~~CORPORATE HEALTH PHYSICS DIRECTOR (CEOF)~~

~~The Corporate Health Physics Director (HPD) shall support the onsite Health Physics activities and report to the Corporate Protective Measures Director. The Corporate HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable.~~

~~Responsibilities assigned to the Corporate Health Physics Director (prior to the EOF Organization assuming Command and Control), include:~~

- ~~Determine the need for additional radiological support personnel, Health Physics instrumentation, dosimetry, and protective equipment.~~
- ~~Review plant health physics information and make recommendations to the Corporate Technical Support Manager.~~
- ~~Assist in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.~~
- ~~Assist in the planning and coordination of activities associated with the evacuation of non essential personnel.~~
- ~~Keep informed of the activities of CECo and State offsite environmental monitoring teams.~~
- ~~Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:~~
  - ~~Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.~~
  - ~~Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.~~
  - ~~Coordinate the activities of contracted radiological medical assistance personnel.~~
  - ~~Analyse all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.~~
  - ~~Ensure that procedures governing the use of thyroid blocking agents have been followed by CECo emergency personnel.~~
  - ~~Consult with the Corporate MEO regarding measures to protect onsite personnel and the offsite public.~~
- ~~Maintain a record of GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, the Corporate Health Physics Directors shall perform activities in support of the Health Physics Director at the EOF.~~

TABLE 4.3-5 6

~~CORPORATE~~ PROTECTIVE MEASURES DIRECTOR (CEOF)

The ~~Corporate~~ Protective Measures Director (~~PMD~~ ~~CEOF~~) reports to the ~~CMEO~~ (CEOF) and directs the activities of the Health Physics/Environmental Specialists (CEOF). ~~and is responsible for coordinating all~~ The PMD (CEOF) is cognizant of offsite sampling/monitoring activities of CECo personnel and ~~for~~ interface~~ing~~ with State personnel regarding dose assessment programs, as appropriate. The PMD (CEOF) shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposure as low as reasonably achievable. When the EOF Organization assumes Command and Control, the ~~Corporate~~ PMD shall serve as a support individual for the Protective Measures Director (EOF) ~~at the EOF~~.

Responsibilities assigned to the ~~Corporate~~ Protective Measures Director (CEOF) ~~(prior to the EOF Organization assuming Command and Control)~~ include:

- Provide recommendations for changes in radiological Emergency Action Level classification to the MEO (CEOF).
- ~~Direct~~ Maintain cognizance of ~~the~~ environmental sampling activities ~~of the TSC Environs Director~~.
- Advise the MEO (CEOF) on the need for emergency exposure approval for CECo emergency workers.
- Advise the MEO (CEOF) on the need for administering thyroid blocking agents for CECo emergency workers.
- ~~Direct the activities of the Corporate Health Physics Director~~.
- ~~Coordinate the environmental contractor's assistance in the collection of environmental data.~~
- ~~Cooperate with the Illinois Department of Nuclear Safety (and contiguous State agencies) in the implementation of an offsite dose assessment counterpart program.~~
- Based on environmental sampling or known plant releases, ~~calculate projected dose values for affected areas, based on these projections,~~ advise the ~~CMEO~~ (CEOF) of p Protective a Action r Recommendations (PARs) for plant personnel and members of the public.
- Assist ~~the CMEO~~ in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- ~~Determine the Corporate Protective Measures Director's personal staffing needs as dictated by the level of Corporate response required by the event.~~ Coordinate additional radiological support as requested by the TSC.
- Advise the MEO (CEOF) of the need to staff the EOF based on degrading radiological or environmental conditions.
- Act as an alternate for review and approval of the State Agency Update Checklist.
- Determine the need for and contact Medical Department personnel for assistance.

- Maintain a record of GSEP related activities.

~~When the EOF Organisation has assumed Command and Control, the Corporate Protective Measures Director shall obtain information and perform activities in support of the Protective Measures Director located at the EOF.~~

~~TABLE 4.3-7~~

~~CORPORATE ADVISORY SUPPORT MANAGER (CEOF)~~

~~The Corporate Advisory Support Manager (ASM) will manage the activities of the Advisory Support Group in the CEOF. This group provides support functions in organizational logistics and governmental interface. The Corporate ASM reports to the CMEO and will serve as CMEO in the event that the CMEO is not available. When the EOF Organization assumes Command and Control, the Corporate ASM will functionally serve as a support individual for the Advisory Support Manager located at the EOF.~~

~~Responsibilities assigned to the Corporate ASM (prior to the EOF Organization assuming Command and Control), include:~~

- ~~Assist the CMEO in the evaluation of the significance of an emergency with respect to the public.~~
- ~~Direct the activities of the Corporate Governmental Support Director and the Corporate Manpower/Logistics Director.~~
- ~~Maintain records of information obtained from the other directors within the CEOF Organization, including contacts with offsite agencies, contractors and other support organizations.~~
- ~~Serve as the CMEO in the event that the CMEO is not available.~~
- ~~Ensure that access control to the CEOF is arranged as necessary.~~
- ~~Review and approve the State Agency Update Checklist and ensure that State Updates are transmitted at least hourly.~~
- ~~Determine the Corporate ASM's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~Maintain a record of the GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, the Corporate Advisory Support Manager shall perform functional activities at the CEOF in support of the Advisory Support Manager located at the EOF.~~

INTENTIONALLY BLANK

~~TABLE 4.3-8~~

~~CORPORATE GOVERNMENTAL SUPPORT DIRECTOR (CEOF)~~

~~The Corporate Governmental Support Director (GSD) is responsible for maintaining effective interfaces between State and local agencies and shall provide State agencies with periodic updates, when the CEOF is in Command and Control. The Corporate GSD shall serve as a support individual under the direction of the Corporate Advisory Support Manager.~~

~~Responsibilities assigned to the Corporate Governmental Support Director (prior to the EOF Organization assuming Command and Control), include:~~

- ~~Ensure approved periodic update information is provided to appropriate State and local agencies via the transmittal of the State Agency Update Checklist.~~
- ~~Ensure that updates and information are provided to CECo, State and local CECo liaison personnel, as requested.~~
- ~~Determine the Corporate GSD's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~Maintain a record of GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, perform activities at the CEOF under the functional direction of the Governmental Support Director who is located at the EOF.~~

TABLE 4.3-7

HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)

The Health Physics/Environmental Specialists (CEOF) reports to the Protective Measures Director (CEOF). The Health Physics/Environmental Specialists (CEOF) shall monitor onsite and offsite radiological conditions to collect and disseminate information to the CEOF staff.

Responsibilities assigned to the Health Physics/Environmental Specialists (CEOF) include:

- Identify and trend critical radiological and meteorlogical parameters utilizing the Point History (PTHSTY) and Point Trend programs and the meteorological contractor.
- Evaluate pertinent dose projection data using the ODCS computer models as requested by the PMD (CEOF).
- Remain cognizant of forecast data and ensure that the status is updated periodically.
- Immediately notify the PMD (CEOF) of meteorological changes which may impact identification of downwind sectors.
- Interpret radiological data and provide Protective Action Recommendations (PARs) based upon calculated dose projections to the PMD (CEOF).
- Advise the PMD (CEOF) of changes in Emergency Action Level (EAL) classification based on effluent releases or dose projections.
- Monitor the GSEP Radio transmissions to remain cognizant of the Environmental Field Team activities and radiological conditions.
- Request additional equipment and personnel as necessary to supplement environmental monitoring efforts from unaffected CECo nuclear stations and/or an environmental contractor.
- Convey information pertaining to CECo Environmental Field Team activities and sample results to State authorities.
- Coordinate information flow between the CEOF and the affected State(s) environmental authorities.
- Maintain a record of GSEP related activities.

~~TABLE 4.3-9~~

~~CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF)~~

~~The Corporate Manpower/Logistics Director (MLD) is responsible for directing a staff of manpower, logistics, communications, and personnel support of the station as required by the Corporate MEO. The Corporate MLD shall report to the Corporate Advisory Support Manager.~~

~~Responsibilities assigned to the Corporate MLD (prior to the EOF Organization assuming Command and Control), include:~~

- ~~Provide personnel, equipment, and services as required, primarily from the appropriate Division.~~
- ~~Direct the activities of the Corporate Communications Director.~~
- ~~Make contact with and interface with the Emergency Restoration of Power (ERP) Director concerning utilization of additional Company resources necessary to meet the needs of the Emergency Response.~~
- ~~Direct the clerical staff and ensure the clerical requirements for the other directors at the CEOF are met.~~
- ~~Coordinate with the TSC's Administrative Director in assuring that clerical support is obtained for the EOF and Emergency News Center Organization. This support should be obtained from a station or facility not affected by the emergency.~~
- ~~Obtain services as appropriate to support operation of the CEOF such as, accommodations, office support services, food services and waste disposal.~~
- ~~Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.~~
- ~~Initiate use of the special emergency response function number to accrue emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.~~

~~continued~~

TABLE 4.3-~~7~~ 8

~~CORPORATE~~ ADVISORY SUPPORT MANAGER (CEOF)

The ~~Corporate~~ Advisory Support Manager (~~ASM~~ CEOF) will ~~manage the activities of the Advisory Support Group in the CEOF. This group~~ provides support functions in organizational logistics and governmental interface. ~~The ASM (CEOF) also shall~~ maintain effective interfaces between State and local agencies by providing State agencies with periodic updates. The ~~Corporate~~ ASM (CEOF) reports to the ~~CMEO~~ (CEOF) ~~and also serves as CMEO in the event that the CMEO is not available~~. When the EOF Organization assumes Command and Control, the ~~Corporate~~ ASM (CEOF) will functionally serve as a support individual for the Advisory Support Manager (EOF) ~~located at the EOF~~.

Responsibilities assigned to the ~~Corporate~~ ASM (CEOF) ~~(prior to the EOF Organization assuming Command and Control)~~ include:

- Assist the ~~CMEO~~ (CEOF) in the evaluation of the significance of an emergency with respect to the public.

- ~~Direct the activities of the Corporate Governmental Support Director and the Corporate Manpower/Logistics Director.~~

- ~~Review~~ Prepare, ~~and~~ approve and transmit the State Agency Update Checklist ~~and ensure that State Updates are transmitted~~ at least hourly.

- Maintain records of CEOF activities, ~~information obtained from the other directors within the CEOF Organization, including contacts with offsite agencies, contractors and other support organizations.~~

- ~~Serve as the CMEO in the event that the CMEO is not available.~~

- Ensure that access ~~control~~ to the CEOF ~~is arranged as necessary~~ is limited to ~~Emergency Responders~~.

- ~~Determine the Corporate ASM's personal staffing needs as dictated by the level of corporate response required by the event.~~

- Maintain a record of ~~the~~ GSEP related activities.

~~When the EOF Organization has assumed Command and Control, the Corporate Advisory Support Manager shall perform functional activities at the CEOF in support of the Advisory Support Manager located at the EOF.~~

~~TABLE 4.3-9~~

~~CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF)~~ ~~(cont'd)~~

- ~~Determine the Corporate MLD's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~Coordinate with the Production Training Center to ensure appropriate training is provided for Emergency Response personnel obtained to augment the Emergency Response Organization.~~
- ~~Maintain a record of GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, perform activities at the CEOF under the functional direction of the Manpower/Logistics Director who is located at the EOF.~~

TABLE 4.3-9

EMERGENCY PLANNER (CEOF)

The Emergency Planner (CEOF) is responsible for verifying that the CECo Generating Stations Emergency Plan (GSEP) is implemented effectively and assists the CEOF staff in facility utilization. The Emergency Planner (CEOF) reports to the MEO (CEOF).

Responsibilities assigned to the Emergency Planner (CEOF) include:

- Assist in activation of the CEOF.
- Act as a GSEP subject matter expert for the CEOF Organization.
- Operate the audio-visual system and telecommunications in the EMC as directed by the MEO (CEOF).
- Coordinate CEOF support services as necessary.
- Coordinate maintenance for CEOF equipment as necessary.
- Assist any CEOF personnel, as necessary, in using desired Computer Programs.
- Establish shift staffing for the CEOF using the GSEP Telephone Directory.
- Establish and maintain a CEOF Ingress/Egress Log and Fitness for Duty Verification documentation.
- Verify that the CEOF Organization is maintaining appropriate documentation of their activities.
- Maintain a record of GSEP related activities.

TABLE 4.3-10

~~CORPORATE COMMUNICATIONS DIRECTOR (CEOF)~~

~~The Corporate Communications Director is responsible for the procurement of required telephone and radio communications services and facilities as specified by the Corporate Manpower/Logistics Director and maintenance of these communications as required. When the EOF Organization assumes Command and Control, the Corporate Communications Director reports to the Communications Director, located at the EOF.~~

~~Responsibilities assigned to the Corporate Communications Director include:~~

- ~~Ensure that emergency communications equipment is kept operable.~~
- ~~Obtain additional radio and telephone equipment as necessary to meet the needs of the emergency.~~
- ~~Obtain sufficient personnel to maintain communications equipment in an operable condition.~~
- ~~Maintain a record of GSEP related activities.~~

INTENTIONALLY BLANK

TABLE 4.3-11

EMERGENCY RESTORATION OF POWER (ERP) DIRECTOR

The Emergency Restoration of Power (ERP) Director, located in the CECo Technical Center Office in Maywood, Illinois, shall coordinate the activities of Division personnel and equipment. The ERP Director shall provide for Division support to the affected station. Upon activation of the Corporate Emergency Response Organization, the ERP Director will coordinate with ~~either~~ the Nuclear Duty Officer or the Manpower/Logistics Director (EOF) ~~at the EOF, or the Corporate Manpower/Logistics Director at the CEOF~~.

Responsibilities assigned to the ERP Director include:

- Activate the Emergency Restoration of Power (ERP) Program as necessary to support the station activities.
- Inform the respective Division Director of support service required to meet the needs of the emergency response.
- Obtain additional support from other Divisions if the level of support requirements dictates.
- Maintain a record of GSEP related activities.

4.3.2 THE EOF ORGANIZATION

During incidents classified as Site or General Emergencies, the EOF Organization will be activated. ~~In some instances, activation of the EOF Organization may require that designated Managers or Directors of the CEOF Organization relocate to the EOF and assume additional responsibilities for assigned positions.~~ The EOF Organization functions under a Manager of Emergency Operations who is responsible for the overall company activities aimed at restoring the affected station to a safe status. The CEOF Organization provides support to the EOF Organization under the arrangement detailed in Section 4.3.1. The EOF Organization, depicted in Figure 4.3-2, consists of the following personnel whose major duties are delineated in the referenced tables.

NOTE:

```
**********************************************************************
*  Some EOF Positions are required to be double staffed when         *
*  a remote JPIC, such as Highland Park, is activated. These         *
*  positions are indicated with an asterisk. One responder           *
*  will report to the EOF and one will report to the remote          *
*  JPIC.                                                             *
**********************************************************************
```

Table 4.3-12 Manager of Emergency Operations

Table 4.3-13 Assistant MEO

Table 4.3-14 Technical Support Manager

Table 4.3-15 Technical Support Director

Table 4.3-16 Senior Reactor Operator (at EOF)

Table 4.3-17 Waste Systems Director

Table 4.3-18 Design & Construction Support Director

Table 4.3-19 Technical Information Coordinator

Table 4.3-20 EOF Status Board Recorders

Table 4.3-21 Technical Communicator (to TSC)

Table 4.3-22 ENS Communicator

Table 4.3-23 SPDS/PTHSTY Specialist

TABLE 4.3-14

TECHNICAL SUPPORT MANAGER (EOF)

The Technical Support Manager (TSM) is the designated CECo individual who has requisite authority, nuclear experience and technical expertise to manage a technical staff in support of Emergency Response operations. The Technical Support Manager shall report directly to the Manager of Emergency Operations.

Responsibilities assigned to the TSM include:

- Manage the activities of the Technical Support Group in the EOF.
- Provide recommendations for changes in Emergency Action Level classification to the Manager of Emergency Operations and participate in the decision-making process.
- Provide information to the Assistant MEO for completing the NARS Form.
- Provide the Manager of Emergency Operations with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- Coordinate the activities of the ~~Corporate~~ Technical Support Manager (CEOF) ~~located at the CEOF~~.
- Supervise the activities of the Technical Support Director and monitor the progress in the performance of the Technical Support Director's responsibilities.
- Assist in the development of post-accident recovery measures.
- Provide technical information on the facility design.
- Ensure that modifications needed for plant recovery are implemented in a timely manner.
- Enlist the aid of consultants as necessary.
- Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-25

PROTECTIVE MEASURES DIRECTOR (EOF)

The Protective Measures Director (PMD) is the designated CECo individual who is specifically qualified in the management of radiological consequence assessment and who is authorized to interact with supporting agencies. This individual will supervise the environmental assessment functions at the EOF. The Protective Measures Director shall report to the Manager of Emergency Operations.

Responsibilities assigned to the Protective Measures Director include:

- Obtain input from the Protective Measures Coordinator concerning plant status that potentially may affect the public.
- Advise the Manager of Emergency Operations and Advisory Support Manager/Director concerning protective action recommendations.
- Advise the Manager of Emergency Operations and the Advisory Support Manager/Director concerning changes in accident classification based upon effluent releases or dose projections.
- Provide information to the Assistant MEO for completing the NARS Form.
- ~~When the EOF is activated direct~~ Coordinate the activities of the ~~Corporate~~ Protective Measures Director (CEOF) ~~located at the CEOF~~.
- Direct the activities of the Health Physics Director and the Environmental Emergency Coordinator and monitor the progress in the performance of their responsibilities.
- Provide or delegate to the Environmental Emergency Coordinator the review of the Environmental portions of the State Agency Update Checklist.
- Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-26

HEALTH PHYSICS DIRECTOR (EOF)

The Health Physics Director (HPD) shall support the onsite Health Physics activities under the direction of the Protective Measures Director. The HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable. Responsibilities assigned to the Health Physics Director include:

- Direct the activities of the ~~Corporate Health Physics Director located at the CEOF and the~~ HPN Communicator ~~(EOF) in the EOF~~.
- Direct the activities of any Radiation Technicians (RTs) in the EOF, as required (i.e. habitability checks, etc.)
- Assist the affected station in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- Determine the need for additional Health Physics instrumentation, dosimetry, protective equipment, and radiological support personnel.
- Review plant Health Physics information and make recommendations to the Protective Measures Director.
- Assist and interface with the EOF Technical Group and the Station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- Keep informed of the activities of offsite environmental monitoring teams.
- Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:
  - Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.
  - Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.
  - Coordinate the activities of contracted radiological medical assistance personnel.
  - Analyze all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.
  - Ensure that procedures governing the use of thyroid blocking agents have been followed by CECo emergency personnel.
  - Consult with the MEO regarding measures to protect onsite personnel and the offsite public.
- Maintain a record of GSEP related activities.

TABLE 4 ?-28

ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)

The Environmental Emergency Coordinator (EEC) is the designated CECo individual who is specifically qualified in the coordination of radiological consequence assessment. The Environmental Emergency Coordinator shall report to the Protective Measures Director.

Responsibilities assigned to the Environmental Emergency Coordinator include:

- Ensure communications are established with the Corporate EOF, and/or the TSC to obtain information on the accident conditions, meteorological conditions, and estimates of radioactive material releases.
- Direct the activities of the Protective Measures Communicator, the State Environs Coordinator(s), and the EOF ODCS Specialist.
- Direct the activities of the EOF Environs Director and the environmental staff. Coordinate the activities of the TSC Environs Director and environmental contractors.
- Assist the Protective Measures Communicator in completing the Environmental portion of the State Agency update checklist.
- Interpret radiological data and ~~based upon calculated dose projections, make recommendations for protective actions offsite~~ provide Protective Action Recommendations (PARs) based upon calculated dose projections consistent with this plan and ensure Environmental Status Boards are updated as necessary.
- Identify changes in accident classification based on effluent releases or dose projections.
- Verify that information necessary to implement offsite emergency plans is collected and provided to the Protective Measures Director, including the environmental portion of the State Agency Update Checklist.
- Maintain a record of GSEP related actitivies.

TABLE 4 3-39

~~CORPORATE~~ EMERGENCY PLANNER (EOF)

The ~~Corporate~~ Emergency Planner (~~CEP~~ EOF) is responsible for verifying that the CECo Generating Station Emergency Plan (GSEP) is implemented properly. The ~~CEP~~ Emergency Planner (EOF) shall serve as a support individual for the Advisory Support Director (EOF).

Responsibilities assigned to the ~~Corporate~~ Emergency Planner (EOF) include:

- Monitor information flow within the EOF organization to ensure information requirements are being met.
- Assess the effectiveness of ongoing EOF working relationships and recommend functional enhancements to the Advisory Support Director.
- Verify that the EOF Organization is maintaining appropriate documentation of their activities.
- Act as a GSEP subject matter expert for any member of the Emergency Response Organization.
- Maintain a record of GSEP related activities.

TABLE 4.3-42

MANPOWER/LOGISTICS DIRECTOR (EOF)

The Manpower/Logistics Director is the designated CECo individual who is responsible for providing administrative, logistic, communications, and personnel support for the emergency response operations. The Manpower/Logistics Director shall report to the Advisory Support Director.

Responsibilities assigned to the Manpower/Logistics Director include:

- Direct the activities of the Communications Director and the Computer Specialist(s). ~~Also functionally direct the activities of the Corporate Manpower and Logistics Director located at the CEOF to obtain assistance in fulfilling the responsibilities listed above.~~
- Serve as purchasing agent for the EOF Organization with the responsibility for contract negotiation/administration and material control.
- Direct the clerical staff and ensure the clerical requirements for the other Directors, at the EOF, are met.
- Obtain continual shift staffing requirements from appropriate EOF Directors as necessary to coordinate the scheduling of relief individuals.
- Coordinate with the TSC's Administrative Director in ensuring that clerical support is obtained for the EOF and Emergency News Center Organization. These personnel should be obtained from a station or facility not affected by the emergency.
- Obtain services as appropriate to support operation of the EOF such as, accommodations, office support services, food services and waste disposal.
- Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.
- Initiate use of the special emergency response function number to charge emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.

(continued next page)

4.4 Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities

4.4.1 Criteria for Assuming Command and Control

Emergency personnel assume responsibility for their positions upon receiving notification to activate. Some will perform tasks related to fulfilling their responsibilities before arriving at an emergency facility. The command and control function, however, does not transfer from Control Room to TSC, from TSC to CEOF, from TSC to EOF, or from CEOF to EOF until certain criteria have been met. These criteria are:

1. Minimum staffing levels are met and sufficient personnel are available in the facility to determine classifications, to determine recommended protective actions, to notify state and local agencies and to maintain communications. (In the case of the Control Room, personnel are on-site 24 hours a day.)
2. Personnel in the facility have been fully briefed as to the status of the event and the currently proposed plan of action.
3. A formal statement of turnover between Shift Engineer and Station Director, between Station Director and Manager of Emergency Operations/Corporate MEO or between Corporate MEO and MEO have been made.

4.4.2 Essential Activities of the Command and Control ERF

The essential activities that must be performed once command and control has been assumed by an ERF are as follows:

- Determine ~~proper e~~ Emergency ~~a~~ Action ~~l~~ Level classification.
- Determine ~~proper recommended protective actions~~ Protective Action Recommendations (PARs) for the public and inplant workers.
- Notify state, local and federal agencies as appropriate.
- Maintain communications with their source of information.

4.4.3 Control Room/Station Minimum Staffing

For Nuclear Power Plants with a single Control Room, the minimum shift manning requirements for emergencies are determined by the number of operating Units (see Table 4.4-1). Since requirements for normal plant operations are the same as those shown in Table 4.4-1, the minimum staff will be on-site at all times to respond to emergencies.

NOTE

****
* Shift manning requirements for operating modes other than *
* normal on-line operation are governed by plant Technical *
* Specifications. *
****

CEOF ~~Minimum~~ Staffing

~~The minimum staff for the Corporate EOF is as follows:~~

~~o Corporate Manager of Emergency Operations.~~

~~o Corporate Technical Support Manager or Corporate Advisory Support Manager~~

~~o Corporate Protective Measures Director.~~

~~o One other Director~~

The full CEOF Organization described in Section 4.3.1 shall be present before the CEOF assumes Command and Control responsibilities. This staff parallels the EOF Minimum Staff capabilities.

EOF Minimum Staffing

The minimum staff for the Emergency Operations Facility is as follows:

- o Manager of Emergency Operations (EOF)
- o Technical Support Manager (EOF) ~~, Technical Support Director or Design and Construction Support Director~~
- o One other member of the Technical Group from Figure 4.3-2
- o Protective Measures Director (EOF) ~~or Environmental Emergency Coordinator.~~
- o Environmental Emergency Coordinator (EOF)
- o ODCS Specialist (EOF)
- o Advisory Support Manager (EOF) ~~, Advisory Support Director or Governmental Support Director.~~

~~o Environs Director. (Environs Director may function from either the TSC or the EOF.)~~

~~o One other Director or Communicator.~~

- o Emergency Planner (EOF)

4.4.6 Nondelegable Responsibilities of Command and Control

Regardless of the facilities activated during any emergency, the Director or Manager in Command and Control of the Emergency Response at any given time, shall maintain the following nondelegable responsibilities:

1) Final decision to declare the emergency classification.

2) Final decision to notify and make PARs to offsite authorities ~~and issuance of potassium iodide to CECo emergency workers and onsite personnel~~.

3) Authorization of personnel exposure beyond 10CFR20 limits under emergency conditions.

4) ~~Decision to request assistance from the Department of Energy, Chicago Operations office.~~ Issuance of thyroid blocking agents to CECo emergency workers and onsite personnel.

4.7.3 Federal Radiological Preparedness Coordinating Committee (FRPCC)

The Federal Radiological Preparedness Coordinating Committee consists of the Federal Emergency Management Agency, which chairs the Committee, the Nuclear Regulatory Commission, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Department of Defense, the Department of Agriculture, the Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. The FRPCC shall assist FEMA in providing policy direction for the program of Federal assistance to State and local governments in their radiological emergency planning and preparedness activities.

4.7.4 Department of Energy (D.O.E.) Chicago Operations Office

The Department of Energy has extensive radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident.

Upon request, the Department of Energy (DOE) Chicago Operations Office will provide assistance to Commonwealth Edison following a radiological incident as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The objective of the DOE Chicago Operations Office would be to rapidly dispatch a team of specialists to the incident site where the team would:

1) Make needed radiological assistance available to the general public, State and local governments, and Federal agencies;

2) Provide a framework through which Federal agencies will coordinate their emergency monitoring and assessment activities in support of State and local governments radiological monitoring and assessment activities; and

3) Assist State and local governments in preparing for radiological emergencies by describing Federal radiological assistance responsibilities and capabilities.

4) Establish a Federal Radiological Monitoring and Assessment Center, as necessary, from which it will manage its activities.

If ~~Commonwealth Edison deems that~~ assistance from DOE is necessary or desirable, ~~the Manager of Emergency operations, the Corporate MEO, or the Station Director would notify the DOE Chicago Operations Office. Assistance provided by DOE shall not abridge State or local authority~~. the affected State(s) would notify the DOE Chicago Operations Office.

The primary mechanisms utilized for notifications and transmittal of information include the State of Illinois NARS Form, the NRC Event Notification Worksheet and the State Agency Update Checklist. The reporting requirements and the use of these forms will be described below:

NOTE

****
* The offsite notification requirements for NARS, NRC ~~Event~~ *
* ~~N~~notifications ~~Worksheet~~ and State Agency Update~~s~~ Checklists *
* are the responsibility of the facility in Command and Control.*
* ~~of the emergency response~~ The NRC ENS and HPN notification *
* responsibilities shall remain with the Station until the EOF *
* assumes Command and Control. Other activated facilities shall*
* assist in the acquisition of information on these forms. *
****

6.1.1.1 State of Illinois NARS Form

A NARS Form (Figure 6.1-1a) shall be utilized to transmit information to appropriate State and local agencies within fifteen minutes of event declaration. (See Section 5.0). All NARS messages shall be reported in the format of the current NARS Form. The format and content of the NARS Form must be mutually agreed to by the Directors of Illinois Emergency Services and Disaster Agency (IESDA) and Illinois Department of Nuclear Safety (IDNS) and the General Manager of Nuclear Services before its use. The NARS Form is a State of Illinois form included in the GSEP to aid the reader in understanding the reporting concept. The NARS Form, including instructions for its use on the reverse side, is included in this Section.

This form is not subject to onsite or offsite review.

6.1.1.2 NRC Event Notification Worksheet

An NRC Event Notification Worksheet should be utilized to transmit information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. A copy of the Event Notification Worksheet is not included in this plan, but should be available in all locations containing an Emergency Notification System phone.

This form is not subject to onsite or offsite review.

TABLE 6.1-1
PRIMARY EMERGENCY RESPONSE ACTIONS FOR UNUSUAL EVENT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is an nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated if deemed appropriate.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant.
- o Terminate if conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide periodic State Agency Updates.

2) SYSTEM POWER DISPATCHER

a. Record NARS form information, as appropriate
b. Immediately notify the Nuclear Duty Officer

TABLE 6.1-2
PRIMARY EMERGENCY RESPONSE ACTIONS FOR ALERT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is an nondelegable responsiblity of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Downgrade to Unusual Event if conditions warrant.
- o Enter Recovery or terminate as conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.

TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. If CEOF or EOF assumes command and control, then report to ~~CMEO or MSO~~ (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

a. Call affected station - verify plant status and event classification
~~b. Notify appropriate company personnel~~

NOTE
****
* If a Significant Alert classification is declared, then the CEOF *
* Organization shall be activated. *
****

b. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations) ~~, if deemed appropriate~~ as required.
c. If an EOF is to be activated, ensure access control is initiated.
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.
~~e. Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation, if deemed appropriate.~~
~~f. If EOF is to be activated, ensure access control is initiated.~~

4) ~~CORPORATE MANAGER OF EMERGENCY OPERATIONS/~~MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.1-3
PRIMARY EMERGENCY RESPONSE ACTIONS FOR SITE EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
- o Initiate assembly and accountability.

b. Authorize initial notifications to the following (Authorization of initial State notifications is an nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Do not downgrade.
- o Enter Recovery or Terminate as conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
- o Dispatch environs monitoring teams
- o Conduct evacuation of non-essential personnel

TABLE 6.1-3 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. When CEOF or EOF assumes command and control, then report to ~~EMEO~~ (CEOF or EOF) ~~or MEO~~.

3) NUCLEAR DUTY OFFICER

a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations). ~~Call affected station - verify plant status and event classification~~
b. Call affected station - verify plant status and event classification ~~Notify appropriate Company personnel~~.
c. Ensure EOF access control has been initiated. ~~Initiate activation of Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations)~~
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.
~~e. Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation.~~
~~f. Ensure EOF access control has been initiated.~~

4) ~~CORPORATE MANAGER OF EMERGENCY OPERATIONS/~~MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.1-4
PRIMARY EMERGENCY RESPONSE ACTIONS FOR GENERAL EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
- o Initiate assembly and accountability.

b. Authorize initial notifications to the following (nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated, if deemed appropriate.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Do not downgrade classification.
- o Enter Recovery or Terminate as conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
- o Dispatch environs monitoring teams
- o Conduct evacuation of non-essential personnel

TABLE 6.1-4 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. When CEOF or EOF assumes command and control, then report to ~~EMEO~~ (CEOF ~~or~~ EOF) ~~or MSO~~.

3) NUCLEAR DUTY OFFICER

a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations). ~~Call affected station -- verify plant status and event classification~~
b. Call affected station - verify plant status and event classification ~~Notify appropriate Company personnel~~.
c. Ensure EOF access control has been initiated. ~~Initiate activation of Corporate Emergenc, Response Organization (CEOF, EOF and/or ENC Organizations)~~
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.
~~e. Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation.~~
~~f. Ensure EOF access control has been initiated.~~

4) ~~CORPORATE MANAGER OF EMERGENCY OPERATIONS/~~MANAGER OF EMERGENCY OPERATIONS (CEOF and EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.1-5

PRIMARY EMERGENCY RESPONSE ACTIONS FOR RECOVERY

1) STATION DIRECTOR/~~CORPORATE MEO~~/MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Evaluate the guidance in Section 5.0 of this plan to determine if Recovery is appropriate.
b. Declare Recovery to be in effect (nondelegable responsibility of Command and Control)
c. Ensure notification of the following:
   - o System Power Dispatcher
   - o Illinois ESDA and DNS
   - o Iowa Disaster Services Division (for Quad Cities Station only)
   - o Wisconsin Division of Emergency Government (for Zion Station only)
   - o Contiguous local authorities as required
   - o NRC
   - o ANI
   - o INPO

d. Evaluate parameters, environmental conditions and other information to determine what long-term organization is required for Recovery.
e. Schedule personnel, material, and equipment necessary to support Recovery.
f. Provide mechanisms, if required, for periodic plant status and meteorological information to ESDA/DNS and contiguous state authorities.
g. Determine level of activation and/or manning of emergency response facilities if preplanned events are to occur that have a potential (possibility) of impacting upon the health and safety of the public, CECo personnel, plant equipment, and/or the environment.
h. With the concurrance and approval of the Senior Vice President, Nuclear Operations, modify the Station Emergency Response Organization (i.e., Control Room, OSC and TSC) and the Corporate Emergency Response Organization (i.e., CEOF, EOF, and Emergency News Center) as necessary to support recovery efforts.

7.1.4 Corporate EOF (CEOF)

The ~~CEOF~~ Corporate EOF (CEOF) is the location from which the ~~Corporate~~ Manager of Emergency Operations (CEOF) will direct a staff in evaluating, coordinating, and directing the overall company activities involved ~~in coping~~ with an emergency. ~~The CEOF is normally only activated during regular company working hours, 8:00 a.m. to 4:30 p.m., Monday through Friday.~~ Activation of the CEOF is mandatory upon declaration of a Significant Alert, a Site Emergency or General Emergency.

~~When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role.~~ The CEOF is located in the Downers Grove facility.

~~At a Site or General Emergency, the CEOF staff, if activated, shall be relieved when the affected Station's EOF is manned. At that time, certain CEOF staff may be asked to make themselves available as support staff to the EOF.~~

The CEOF is also the official backup EOF for Zion Station. ~~The command center located in the Edison Building (formerly the CCC) shall remain the official backup EOF for Zion Station.~~ The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- Technical Support personnel
- Advisory Support personnel
- Environmental Assessment personnel
- Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

7.1.5 Emergency Operations Facility (EOF) (cont'd)

The four (4) primary EOFs (Mazon EOF to serve Dresden, Braidwood and LaSalle County Stations, Dixon EOF for Byron Station, Morrison EOF for Quad Cities Station, and Zion EOF for Zion Station) are constructed according to the design criteria such that:

1) The location provides optimum functional and availability characteristics for carrying out overall strategic direction of CECo onsite and support operations, determination of public protective actions to be recommended to offsite officials, and coordination with Federal, State and local organizations.

2) They are well engineered for the design life of the plant and are of sufficient size to accommodate about 50 people. The Zion Station EOF, because of its close proximity to the station, is provided with additional radiological protection features. It also has a backup facility located in Downers Grove should the EOF become uninhabitable.

3) They are equipped with reliable voice communications capabilities to the TSC, the OSC, the CECF, the Control Room, NRC, and State and local emergency operations centers. In addition, each EOF has facsimile transmission capability.

4) Equipment is provided to gather, store, and display data needed in the EOF to analyze and exchange information on plant conditions with the Station Director in the TSC.

5) The EOF technical data system receives, stores, processes, and displays information sufficient to perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition.

6) They have ready access to plant records, procedures, and emergency plans needed for effective overall management of CECo emergency response resources.

7.1.6 JOINT PUBLIC INFORMATION CENTER (JPIC)

The Joint Public Information Center (JPIC) is the facility in which media personnel gather to receive information related to the emergency event. The JPIC may or may not be in the same physical location as the EOF.

Emergency News personnel operate from the Joint Public Information Center (JPIC), which is under the direction of the Public Information Manager and functions as the single point contact to interface with Federal, State, and local authorities who are responsible for disseminating information to the public. The Public Information Manager and appropriate technical spokespersons shall be available to brief the press at the JPIC.

7.2 Communication Systems

CECo has extensive and reliable communication systems installed at its generating stations, System Power Supply Office, Corporate Headquarters, and Division load dispatching offices. These systems include the use of normal and dedicated telephone lines on land lines and microwave voice channels, mobile radio units, handi-talkies, and computer peripherals. For the purposes of emergency communications, the system is addressed in terms of functional areas as described in the following sections.

7.2.1 Nuclear Accident Reporting System (NARS)

The Nuclear Accident Reporting System (NARS) is a dedicated telephone voice communications system that has been installed for the purpose of notifying State and local authorities of declared nuclear emergencies. This phone is normally colored green. This system links together the station Control Rooms, the CEOF, EOFs, TSCs, System Power Supply Office, and State and local authorities as appropriate.

Illinois ESDA and Illinois DNS, in cooperation with Commonwealth Edison, are responsible for the development and execution of all steps necessary to ensure continuous operation of the NARS.

7.2.2 Dedicated Emergency Response Facility (ERF) Communication Systems

~~NOTE~~

~~The CEOF (Downers Grove) will not have microwave capabilities until installation of a fiber optics link is completed. Microwave voice channels, PL, Alternate GSEP lines and GSEP radio will not be available until this time.~~

CECo has established several dedicated communication systems that ensure reliable and timely exchange of information necessary to provide effective command and control over any emergency response. These systems include:

- A microwave voice channel between the CEOF and the Station Control Room, the TSC, and the EOF at each nuclear station. This phone is normally colored gray.

  This phone is referred to as the Alternate GSEP Phone. (See Figure 7.2-1)

- A telephone link that enables communication between the CEOF, the TSC, and the EOF. This phone is normally colored yellow and is referred to as the GSEP Phone. (See Figure 7.2-1)

- Party Line (PL) communications that enable personnel of the same discipline to conference from up to six different locations at the same time. Designated PL lines are as follows:

  (PL-1) Health Physics Party Line
  (PL-2) Environmental Party Line
  (PL-3) Technical Party Line
  These lines are normally colored Blue and are located in various ERFs and Company Offices.

The Following Section

Depicts the Changes as

They Wiill Appear

With Revision Lines

GSEP REVISION 7 CONTENTS (Page 1 of 2)

REVISION #	REVISION DATE	EFFECTIVE DATE
7	JUNE 1990	MARCH 1991
7A	MAY 1992	JULY 15 1992
7B	[UPON GSEP-92-01 AND GSEP-93-01 APPROVAL]	

GSEP PAGE #	REVISION #
0-1 through 0-1a	GSEP-93-01
0-2	7
0-3 through 0-4	7A
0-5	GSEP-93-01
0-6	7
0-7 through 0-9	GSEP-93-01
0-10 through 0-16	7
0-17	7A
0-18 through 0-25	7
SECTION 1.0	7
SECTION 2.0	
2-1 through 2-5	7
2-6 through 2-7	GSEP-93-01
2-8	7
SECTION 3.0	
3-1 through 3-3	7
3-4	GSEP-92/93-01
3-5 through 3-6	7
3-7	GSEP-92/93-01
3-8	7
SECTION 4.0	
4-1 through 4-5	7
4-6	7A
4-7	GSEP-93-01
4-8 through 4-9	7
4-10	GSEP-93-01
4-11 through 4-17	7
4-18	GSEP-93-01
4-19 through 4-24	7
4-25	GSEP-93-01
4-26 through 4-28	7
4-29 through 4-32	GSEP-93-01
4-33	7
4-34 through 4-46	GSEP-93-01
4-47 through 4-48	7A
4-49 through 4-50	7
4-51	GSEP-93-01
4-52 through 4-61	7
4-62 through 4-63	GSEP-93-01
4-64	7
4-65	GSEP-93-01
4-66 through 4-70	7
4-71	GSEP-93-01
4-72 through 4-76	7
4-77	GSEP-93-01
4-78 through 4-79	7
4-80	GSEP-93-01
4-81 through 4-84	7
4-85	7A
4-86	7
4-87	7A
4-88 through 4-100	7
4-101	GSEP-93-01
4-102 through 4-108	7
4-109	GSEP-93-01
4-110 through 4-112	7
4-113	7A
4-114 through 4-115	7
4-116	GSEP-93-01
4-117 through 4-129	7
SECTION 5.0	7
SECTION 6.0	
6-1	7
6-2	7A
6-3	GSEP-93-01
6-4 through 6-14	7
6-15	GSEP-93-01
6-16	7
6-17 through 6-23	GSEP-93-01
6-24	7
6-25	7A
6-26 through 6-28	7
6-29	7A
6-30 through 6-45	7
6-46	7A
6-47 through 6-48	7
6-49 through 6-50	7A
6-51 through 6-55	7
6-56	7A
SECTION 7.0	
7-1 through 7-3	7
7-4	GSEP-92/93-01
7-5	GSEP-92-01
7-6	7
7-7	GSEP-92-01
7-8 through 7-15	7
SECTION 8.0	
8-1 through 8-7	7
8-8	7A
8-9 through 8-13	7
8-14	7A
8-15	7

GSEP REVISION 7 CONTENTS (Page 2 of 2)

GSEP PAGE #	REVISION #
SECTION 9.0	
9-1	7
9-2	7A
9-3 through 9-5	7
SECTION 10.0	7

SECTION 2 (continued)

		Page Number
2.19	GSEP	2-4
2.20	HAZARDOUS MATERIAL	2-4
2.21	IMMINENT	2-5
2.22	MONTHLY	2-5
2.23	NON-ESSENTIAL SITE PERSONNEL	2-5
2.24	NUCLEAR STATION	2-5
2.25	OFFSITE	2-5
2.26	ONSITE	2-5
2.27	POTENTIAL	2-5
2.28	PROBABLE	2-6
2.29	PROJECTED DOSE	2-6
2.30	PROTECTED AREA	2-6
2.31	PROTECTIVE ACTION GUIDES (PAGs)	2-6
2.32	PROTECTIVE ACTION RECOMMENDATIONS (PARs)	2-6
2.33	PROTECTIVE ACTIONS	2-6
2.34	QUARTERLY	2-7
2.35	SEMI-ANNUAL	2-7
2.36	SHALL, SHOULD AND MAY	2-7
2.37	SIGNIFICANT ALERT	2-7
2.38	SITE BOUNDARY	2-7
2.39	STANDBY	2-7
2.40	THYROID BLOCKING AGENT	2-8
2.41	VITAL AREAS	2-8
2.42	VITAL EQUIPMENT	2-8
2.43	WEEKLY	2-8
2.44	WORST CASE METEOROLOGY	2-8

SECTION 4

		Page Number
4.0	ORGANIZATIONAL CONTROL OF EMERGENCIES	4-1
4.1	PLANT ORGANIZATION	4-2
	4.1.1 STATION MANAGER	4-2
	4.1.2 SUCCESSION OF AUTHORITY	4-2
	4.1.3 INITIAL RESPONSE TO ALL EVENTS	4-2
	4.1.3.1 SHIFT ENGINEER (ACTING STATION DIRECTOR)	4-3
	4.1.3.2 STATION CONTROL ROOM ENGINEER (SCRE)/SHIFT TECHNICAL ADVISOR (STA)	4-4
	4.1.3.3 ON SHIFT PERSONNEL	4-4
	4.1.3.4 RADIATION PROTECTION PERSONNEL	4-4
	4.1.3.5 CHEMISTRY	4-4
	4.1.3.6 SECURITY	4-4
4.2	STATION EMERGENCY RESPONSE ORGANIZATION	4-5
	4.2.1 TECHNICAL SUPPORT CENTER	4-6
	4.2.2 OPERATIONAL SUPPORT CENTER (OSC)	4-6
	(F)4.2-1 THE STATION EMERGENCY RESPONSE ORGANIZATION	4-8
	(T)4.2-1 ACTING STATION DIRECTOR/STATION DIRECTOR	4-9
	(T)4.2-2 ASSISTANT STATION DIRECTOR (TSC)	4-11
	(T)4.2-3 STATE/NARS COMMUNICATOR (TSC)	4-12
	(T)4.2-4 OPERATIONS DIRECTOR (TSC)	4-13
	(T)4.2-5 CONTROL ROOM COMMUNICATOR (IN THE TSC)	4-14
	(T)4.2-6 OPERATIONAL SUPPORT CENTER DIRECTOR (OSC)	4-15
	(T)4.2-7 OPERATIONAL SUPPORT CENTER SUPERVISOR (OSC)	4-16
	(T)4.2-8 TECHNICAL DIRECTOR (TSC)	4-17
	(T)4.2-9 TECHNICAL COMMUNICATOR (TO CEOF/EOF)	4-18
	(T)4.2-10 ENS COMMUNICATOR (TSC)	4-19
	(T)4.2-11 TSC TECHNICAL STATUS BOARD RECORDER(S)	4-20
	(T)4.2-12 ADMINISTRATIVE DIRECTOR (TSC)	4-21
	(T)4.2-13 RADIATION PROTECTION DIRECTOR (TSC)	4-22
	(T)4.2-14 CHEMISTRY DIRECTOR (TSC)	4-23
	(T)4.2-15 HPN COMMUNICATOR (TSC)	4-24
	(T)4.2-16 TSC ENVIRONS DIRECTOR (TSC)	4-25
	(T)4.2-17 TSC ODCS SPECIALIST (TSC)	4-26
	(T)4.2-18 MAINTENANCE DIRECTOR (TSC)	4-27
	(T)4.2-19 STORES DIRECTOR (TSC)	4-28
	(T)4.2-20 SECURITY DIRECTOR (TSC)	4-29

SECTION 4 (continued)

	PageNumber
4.3 CORPORATE EMERGENCY RESPONSE ORGANIZATION	4-30
4.3.1 THE CEOF ORGANIZATION	4-31
(F) 4.3-1 THE CEOF ORGANIZATION	4-32
(T) 4.3-1 SYSTEM POWER SUPPLY OFFICE (SYSTEM POWER DISPATCHER)	4-33
(T) 4.3-2 NUCLEAR DUTY OFFICER (NDO)	4-34
(T) 4.3-3 MANAGER OF EMERGENCY OPERATIONS (CEOF)	4-36
(T) 4.3-4 TECHNICAL SUPPORT MANAGER (CEOF)	4-37
(T) 4.3-5 TECHNICAL SPECIALIST (CEOF)	4-38
(T) 4.3-6 PROTECTIVE MEASURES DIRECTOR (CEOF)	4-39
(T) 4.3-7 HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)	4-41
(T) 4.3-8 ADVISORY SUPPORT MANAGER (CEOF)	4-42
(T) 4.3-9 EMERGENCY PLANNER (CEOF)	4-43
(T) 4.3-10 INTENTIONALLY BLANK	4-44
(T) 4.3-11 EMERGENCY RESTORATION OF POWER (ER~) DIRECTOR	4-45
4.3.2 THE EOF ORGANIZATION	4-46
(F) 4.3-2 THE EOF ORGANIZATION	4-48
(T) 4.3-12 MANAGER OF EMERGENCY OPERATIONS	4-49
(T) 4.3-13 ASSISTANT MEO (EOF)	4-50
(T) 4.3-14 TECHNICAL SUPPORT MANAGER (EOF)	4-51
(T) 4.3-15 TECHNICAL SUPPORT DIRECTOR (EOF)	4-52
(T) 4.3-16 SENIOR REACTOR OPERATOR (EOF)	4-53
(T) 4.3-17 WASTE SYSTEMS DIRECTOR (EOF)	4-54
(T) 4.3-18 DESIGN AND CONSTRUCTION SUPPORT DIRECTOR (EOF)	4-55
(T) 4.3-19 TECHNICAL INFORMATION COORDINATOR (EOF)	4-56
(T) 4.3-20 EOF STATUS BOARD RECORDERS (EOF)	4-57
(T) 4.3-21 TECHNICAL COMMUNICATOR (TO TSC)	4-58
(T) 4.3-22 ENS COMMUNICATOR (EOF)	4-59
(T) 4.3-23 SPDS/PTHSTY SPECIALIST (EOF)	4-60
(T) 4.3-24 PROTECTIVE MEASURES COORDINATOR (EOF)	4-61
(T) 4.3-25 PROTECTIVE MEASURES DIRECTOR (EOF)	4-62
(T) 4.3-26 HEALTH PHYSICS DIRECTOR (EOF)	4-63

SECTION 4 (continued)

		Page Number
	(T) 4.3-27 HPN COMMUNICATOR (EOF)	4-64
	(T) 4.3-28 ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)	4-65
	(T) 4.3-29 PROTECTIVE MEASURES COMMUNICATOR (EOF)	4-66
	(T) 4.3-30 EOF ENVIRONS DIRECTOR (EOF)	4-67
	(T) 4.3-31 GSEP RADIO COMMUNICATOR (EOF)	4-68
	(T) 4.3-32 EOF ODCS SPECIALIST (EOF)	4-69
	(T) 4.3-33 STATE ENVIRONS COORDINATOR(S)	4-70
	(T) 4.3-34 ADVISORY SUPPORT MANAGER (EOF)	4-71
	(T) 4.3-35 ADVISORY SUPPORT DIRECTOR (EOF)	4-72
	(T) 4.3-36 GOVERNMENTAL SUPPORT DIRECTOR (EOF)	4-73
	(T) 4.3-37 CECo EOC LIAISON(S)	4-74
	(T) 4.3-38 GOVERNMENTAL COMMUNICATOR(S) (EOF)	4-75
	(T) 4.3-39 EMERGENCY PLANNER (EOF)	4-77
	(T) 4.3-40 SAFEGUARDS SPECIALIST (EOF)	4-78
	(T) 4.3-41 ACCESS CONTROL COORDINATOR (EOF)	4-79
	(T) 4.3-42 MANPOWER/LOGISTICS DIRECTOR (EOF)	4-80
	(T) 4.3-43 COMMUNICATIONS DIRECTOR (EOF)	4-82
	(T) 4.3-44 COMPUTER SPECIALIST(S) (EOF)	4-83
4.3.3	THE EMERGENCY NEWS CENTER (ENC) ORGANIZATION	4-84
	(F) 4.3-3 EMERGENCY NEWS CENTER (ENC) ORGANIZATION WHEN CO-LOCATED EOF/JPIC IS ACTIVATED	4-86
	(F) 4.3-4 EMERGENCY NEWS CENTER (ENC) ORGANIZATION WHEN A REMOTE JPIC IS ACTIVATED	4-87
	(T) 4.3-45 PUBLIC INFORMATION MANAGER/ENC CORPORATE SPOKESPERSON (ENC)	4-88
	(T) 4.3-46 PUBLIC INFORMATION DIRECTORS (ENC)	4-89
	(T) 4.3-47 JPIC COORDINATOR (ENC)	4-91
	(T) 4.3-48 INFORMATION LIAISON (ENC)	4-92
	(T) 4.3-49 TECHNICAL ADVISORS (ENC)	4-93
	(T) 4.3-50 TECHNICAL SPOKESPERSON (ENC)	4-94
	(T) 4-3-51 H.P./ENVIRONMENTAL ADVISORS (ENC)	4-95
	(T) 4.3-52 H.P./ENVIRONMENTAL SPOKESPERSON (ENC)	4-96
	(T) 4.3-53 ENC RECORDER (ENC)	4-97
	(T) 4.3-54 NEWSWRITERS (ENC)	4-98
	(T) 4.3-55 MEDIA MONITORING COORDINATOR (ENC)	4-99
	(T) 4.3-56 RUMOR CONTROL COORDINATOR (ENC)	4-10

2.28 PROBABLE

Supported by evidence strong enough to establish presumption but not proof; an event that is likely to occur; the probability that an event will occur is greater than or equal to 50%.

2.29 PROJECTED DOSE

That calculated dose commitment that some individuals in the population group may receive if no protective actions are implemented. Projected doses are calculated to establish an upper limit boundary.

2.30 PROTECTED AREA

That onsite area within the security boundary as defined in each station's Security Plan.

2.31 PROTECTIVE ACTION GUIDES (PAG)

Projected radiological dose or dose commitment values to individuals in the general population that warrant protective action.

Protective Action Guides are criteria used to determine if the general population needs protective action regarding projected radiological doses, or from actual committed (measured) dose values.

2.32 PROTECTIVE ACTION RECOMMENDATIONS (PARs)

Recommended actions to the States for the protection of the offsite public from whole body external gamma radiation, and inhalation and ingestion of radioactive materials. Typical PARs include recommendations for sheltering, evacuation, access control and other recommendations concerning the safeguards of affected food chain processes.

2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 SIGNIFICANT ALERT

Those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5.

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

* The CEOF Organization
* The EOF Organization
* The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEOF) and Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal, State, and local authorities.

The CEOF will be activated at a Significant Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).

The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the Manager of Emergency Operations. The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control. Once the EOF Organization is activated, the CEOF Organization becomes support staff to the EOF. (See Section 4.0).

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the Manager of Emergency Operations (CEOF) will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of a Significant Alert, Site Emergency or General Emergency. When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, Manager of Emergency Operations (CEOF) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove.

Recommended organization and staffing for the OSC during extended emergency events (i.e., events lasting longer than twenty-four hours) are shown in figures included with this section.

NOTE:

The OSC shall remain activated during events classified as Site Emergency and General Emergency. The OSC may be de-activated at the Alert level if deemed unnecessary by the Acting Station Director/Station Director.

All Station Emergency Response Organization personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan. The major responsibilities and duties of these personnel are given in the following tables:

Table 4.2-1 - Acting Station Director/Station Director
Table 4.2-2 - Assistant Station Director
Table 4.2-3 - State/NARS Communicator
Table 4.2-4 - Operations Director
Table 4.2-5 - Control Room Communicator (in the TSC)
Table 4.2-6 - Operational Support Center Director
Table 4.2-7 - Operational Support Center Supervisor
Table 4.2-8 - Technical Director
Table 4.2-9 - Technical Communicator (to CEOF/EOF)
Table 4.2-10 - ENS Communicator
Table 4.2-11 - TSC Technical Status Board Recorders
Table 4.2-12 - Administrative Director
Table 4.2-13 - Radiation Protection Director
Table 4.2-14 - Chemistry Director
Table 4.2-15 - HPN Communicator
Table 4.2-16 - TSC Environs Director
Table 4.2-17 - TSC ODCS Specialist
Table 4.2-18 - Maintenance Director
Table 4.2-19 - Stores Director
Table 4.2-20 - Security Director

TABLE 4.2-1 (cont'd)

ACTING STATION DIRECTOR/STATION DIRECTOR

PART B) STATION DIRECTOR (TSC) RESPONSIBILITIES WITH THE CORPORATE EOF OR EMERGENCY OPERATIONS FACILITY IN COMMAND AND CONTROL INCLUDE:

- o Keep the Manager of Emergency Operations (CEOF or EOF) and NRC informed as to the status of the plant.
- o Assist the MEO (CEOF or EOF) in the acquisition of information for the NARS, NRC Event Notification Worksheet and State Agency Update Checklist.
- o Provide information and recommendations to the MEO (CEOF or EOF).
- o Implement plans, procedures and schedules to meet emergency response objectives as directed by the MEO (CEOF or EOF).
- o Request from the Corporate Emergency Response Organization any additional material, manpower and equipment needed to implement response plans and operations.
- o Continue to supervise the Station Emergency Response Organization (i.e. Control Room, OSC and TSC).
- o Provide a station Senior Reactor Operator (SRO) for the EOF as requested by the MEO or Nuclear Duty Officer.
- o Maintain a record of GSEP related activities.

TABLE 4.2-9

TECHNICAL COMMUNICATOR (TO CEOF/EOF)

The TSC Communicators are responsible for transmitting/receiving information to and from the TSC.

General responsibilities assigned to all TSC Communicators include:

- Establish communications with appropriate parties as directed by the responsible Director.
- Transmit information that has been reviewed and/or approved by the responsible Director.
- Document time, date and information being transmitted or received on appropriate forms.
- Record and relay inquiries to responsible Directors and the responses to those inquiries.
- Assist appropriate Directors in maintaining proper records and logs of GSEP related activities.

SPECIFIC DUTIES ASSIGNED TO THE TECHNICAL COMMUNICATOR (TO CEOF/EOF) INCLUDE:

- Report to TSC Technical Director.
- Establish and maintain contact with the Technical Specialist (CEOF) and/or the Technical Communicator at the EOF.
- Provide CEOF/EOF with Plant Status Information as directed by the TSC Technical Director.

TABLE 4.2-16

TSC ENVIRONS DIRECTOR (TSC)

The TSC Environs Director reports to the Radiation Protection Director and supervises the activities of CECo Environmental Sampling Teams in an emergency. Once the EOF Environs Director has taken control of the Environmental Sampling Teams, the TSC Environs Director will continue to monitor offsite environmental data and will assist the Radiation Protection Director as deemed appropriate.

Responsibilities assigned to the TSC Environs Director include:

- o Supervise the activities of the ODCS Specialist.
- o Assemble one or more environmental monitoring teams, and track these individuals accumulated dose.
- o Dispatch and coordinate the activities of CECO Environmental Monitoring Teams. This includes:
  - -- Dose rate surveys (including plume tracking);
  - -- Air sampling;
  - -- Soil, water, and vegetation sampling;
  - -- Contamination surveys; and
  - -- Exchange of TLDs and filter cartridges from fixed environmental stations.
- o Accumulate, tabulate, and evaluate environmental and radiological data.
- o Request additional environmental personnel and/or equipment, as necessary. This includes:
  - -- Assistance for road blocks and security until State, County and Local personnel are available;
  - -- Obtain communications equipment as necessary. Telephones, mobile radios, and portable radios may be required;
  - -- Obtain required transportation for personnel; and
  - -- Obtain sufficient technical and nontechnical personnel to expand the operation as necessary.
- o Transfer command of the Environs Field Teams to the EOF~~/CEOF~~ Environs Director when appropriate. The Protective Measures Director (CEOF) may take command of the Environmental Field Teams if agreed upon by the MEO (CEOF) and the Station Director or the MEO (EOF).
- o Make appropriate Protective Action Recommendations for the public to the Radiation Protection Director.
- o Maintain a record of GSEP related activities.

TABLE 4.2-20

SECURITY DIRECTOR (TSC)

The Security Director maintains plant security and personnel accountability at the nuclear station. The Security Director shall report directly to the Station Director.

Responsibilities assigned to the Security Director include:

- Maintain plant security and account for all personnel within the protected area as necessary or required.
- Identify, for the Station Director, any nonroutine security procedures and/or contingencies that are in effect or that require a response.
- Expedite ingress and egress of key emergency response personnel, as required.
- Coordinate with the Radiation Protection Director in controlling ingress and egress to and from the protected area if radiological concerns are present.
- Provide for access control to the Control Room, TSC and OSC, as appropriate.
- Initiate security at the EOF and JPIC if it is requested by the MEO (CEOF) or the Station Director. It shall be the responsibility of the Security Director to contact an Access Control Coordinator and to notify the Corporate Nuclear Security Administrator. Access Control Coordinators are listed in the GSEP telephone directory.
- Provide an escort and expedite ingress, as necessary, for NRC Site Team personnel in conjunction with the Radiation Protection Director.
- Act as the TSC liaison with the appropriate NRC Site Team representative.
- Assist the Radiation Protection Director in determining personnel evacuation routes as necessary.
- Assist the Station Director in evaluating changes in security related Emergency Action Levels (EALs).
- Maintain a record of GSEP related activities.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

SECTION 4.3.1 CEOF Organization
SECTION 4.3.2 EOF Organization
SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECo's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Significant Alerts, Site and General Emergencies. CEOF activation for other Alerts or Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEOF) .

NOTE:

The roles of the System Power Supply Office and the Nuclear Duty Officer are unique in that they may be considered as parts of the overall Corporate Emergency Response, but do not hold specifically identified positions within the CEOF Organization, the EOF Organization, or the ENC Organization. For a description of their general responsibilites as they pertain to the GSEP, refer to the following referenced Tables:

Table 4.3-1 System Power Supply Office
Table 4.3-2 Nuclear Duty Officer

NOTE:

The Emergency Restoration of Power (ERP) Director is a position that coordinates with the Corporate Emergency Response Organization. The ERP Director works with the Nuclear Duty Officer when the CEOF is activated and the Manpower/Logistics Director (EOF) when the EOF is activated. This organizational relationship is depicted on the Organization charts by a dotted line. For a description of the general responsibilities of the ERF Director as they pertain to the GSEP, refer to the following referenced Table:

Table 4.3-11 ERP Director

4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control , there are several factors differentiating the CEOF and EOF Organizations:

1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.

2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.

3) The CEOF would likely be the CECo facility utilized during daytime hours for Corporate Response to Transportation Accidents. (This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).

4) The CEOF Organization shall be activated when a Significant Alert, a Site Emergency or a General Emergency is declared.

5) The CEOF may assume the nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies until the EOF is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEOF) and Station Director.

6) When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, after Command and Control is transferred to the EOF.

7) The CEOF should not assume ENS/HPN communications responsibilities

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3 MANAGER OF EMERGENCY OPERATIONS (CEOF)
Table 4.3-4 TECHNICAL SUPPORT MANAGER (CEOF)
Table 4.3-5 TECHNICAL SPECIALIST (CEOF)
Table 4.3-6 PROTECTIVE MEASURES DIRECTOR (CEOF)
Table 4.3-7 HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)
Table 4.3-8 ADVISORY SUPPORT MANAGER (CEOF)
Table 4.3-9 EMERGENCY PLANNER (CEOF)
Table 4.3-10 INTENTIONALLY BLANK

FIGURE 4.3-1

THE CEOF ORGANIZATION

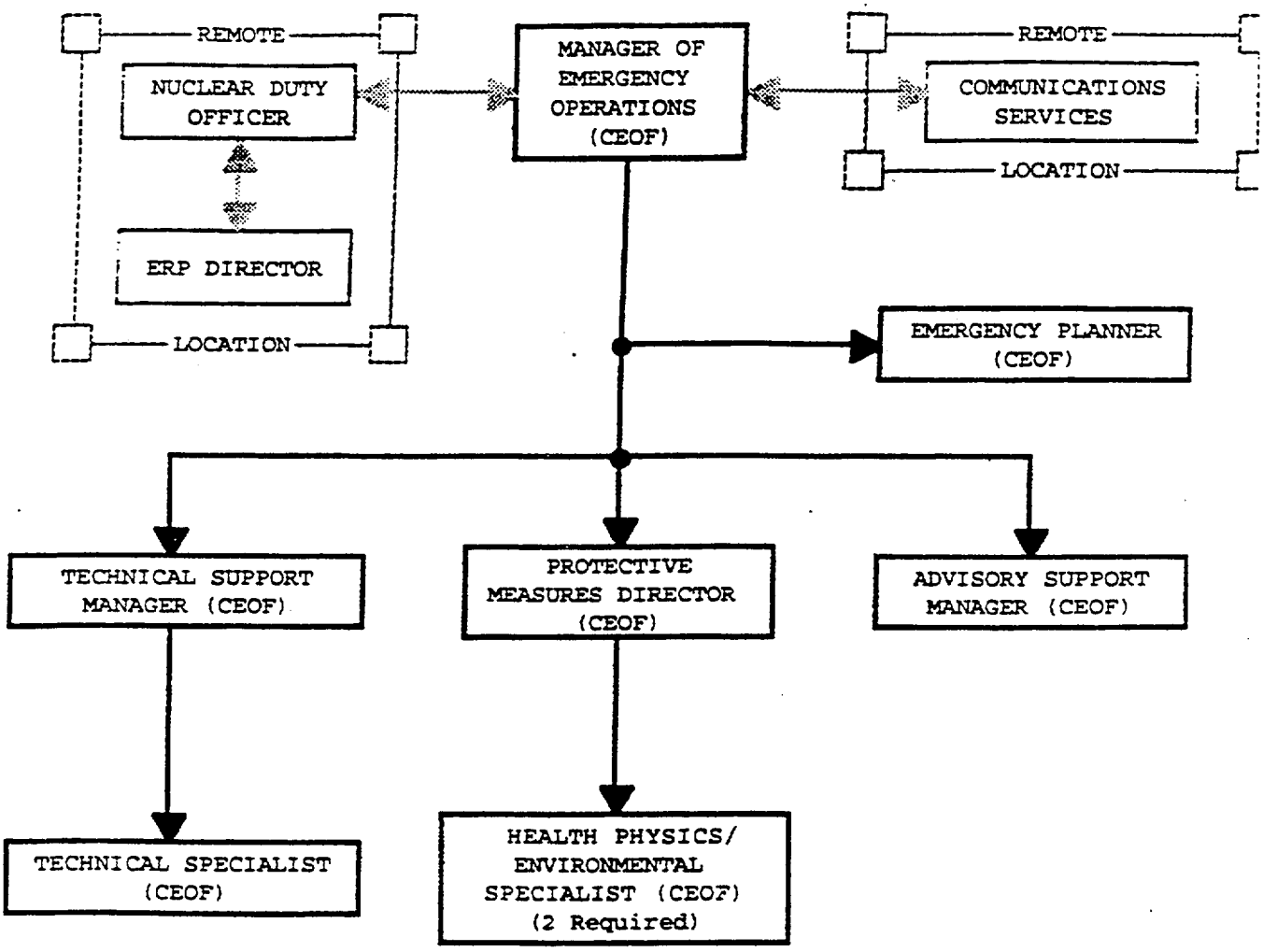


TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECo individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.

b. Verify that all appropriate notifications have been made.

c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.

d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.

e. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.

f. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

a. Complete all actions as listed above in part 1).

b. Notify ANI and INPO within eight (8) hours of event classification.

c. If the Alert Classification is determined to be a Significant Alert, activate the CEOF Organization.

d. When the CEOF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.

3) ACTIONS FOR SITE AND GENERAL EMERGENCIES

a. Activate the Corporate Emergency Response Organization (CEOF and EOF and ENC Organizations). The NDO's responsibilities shall include all the actions identified in 1) and 2) above.

b. Notify the Communications Services Duty Officer (CSDO) and prior to the activation of the Emergency News Center Organization, review any news releases for accuracy.

4) ACTIONS FOR A TRANSPORTATION ACCIDENT

a. Complete actions a, b and e as listed above in part 1).

b. Notify ANI and INPO within eight (8) hours of the accident.

c. Maintain a record of activities.

NOTE:

The NDO's function is to determine the degree of Corporate assistance required to control and mitigate emergency events. Additionally, it is the NDO's responsibility to initiate Corporate assistance, by activating those parts of the Corporate Emergency Response Organization, (CEOF and/or EOF and ENC Organizations), which the NDO deems appropriate or are required by Company procedures.

For more specific duties and responsibilities of the NDO in regards to response to generating station and utility emergencies, refer to the current NDO's Corporate Emergency Plan Implementing Procedure (CEPIP).

TABLE 4.3-3

MANAGER OF EMERGENCY OPERATIONS (CEOF)

The MEO (CEOF), when in Command and Control, will direct CECo's Emergency Response activities until such time when (and if) the EOF Organization assumes Command and Control. When the EOF Organization assumes Command and Control, the MEO (CEOF) and Staff will remain in place as a support group for the Manager of Emergency Operations (EOF).

When the TSC has Command and Control, assume the ongoing responsibilities assigned to the MEO (CEOF), including :

- Direct the CEOF Organization shown in Figure 4.3-1 and coordinate all CECo activities involved in coping with the emergency.
- Coordinate CECo press releases with the Nuclear Duty Officer and Communications Services, as appropriate.
- Request assistance from non-CECo emergency response organizations, as required.
- Evaluate the need, based on events in progress, to staff the EOF to provide additional support to the Station.
- Maintain a record of the GSEP related activities.

When the CEOF assumes Command and Control, assume the additional responsibilities assigned to the MEO (CEOF) including:

- All nondelegable responsibilites of Command and Control as delineated in Section 4.4.6 of this plan.
- Ensure State Agency Update Checklists are completed and transmitted on an hourly basis.
- Approve the contents of the NARS form prior to transmittal.
- Notify appropriate State and local agencies of emergency conditions in accordance with Section 6.0 of this plan.
- Ensure that appropriate measures are taken Onsite to:
  - -- Terminate the condition causing the emergency.
  - -- Protect employees and the public.
  - -- Effect post accident recovery and deactivate the Emergency Response Organization when appropriate.

After the EOF Organization assumes Command and Control:

- Remain at the CEOF and provide assistance to the Station Director and Manager of Emergency Operations (EOF) .

TABLE 4.3-4

TECHNICAL SUPPORT MANAGER (CEOF)

The Technical Support Manager (CEOF) reports to the MEO (CEOF). The TSM (CEOF) will direct the activities of the Technical Specialist (CEOF) and will coordinate the engineering services necessary for plant modifications, special equipment arrangement, shielding, containers, or other devices needed during the emergency. When the EOF Organization assumes Command and Control, the TSM (CEOF) will functionally report to the Technical Support Manager (EOF).

Responsibilities assigned to the Technical Support Manager (CEOF) include:

- Provide recommendations for changes in Emergency Action Level classification to the MEO(CEOF).
- Provide information concerning the status of plant operations and recommendations for mitigating the consequences of the accident.
- Assist in completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- Assist in the development of post-accident recovery measures.
- Advise the MEO (CEOF) of the need to staff the EOF based on degrading plant conditions.
- Maintain a record of GSEP related activities.

TABLE 4.3-5

TECHNICAL SPECIALIST (CEOF)

The Technical Specialist (CEOF) is responsible for obtaining and disseminating plant condition and status information in the CEOF. The Technical Specialist (CEOF) reports to the Technical Support Manager (CEOF).

Responsibilities assigned to the Technical Specialist (CEOF) include:

- Ensure that critical parameters are identified and trended utilizing the Safety Parameter Display System (SPDS), Point History (PTHSTY) and Point Trend programs.
- Advise the TSM (CEOF) of changes in Emergency Action Level (EAL) classification based on plant conditions or parameters.
- Establish contact with the Technical Communicator (TO CEOF/EOF).
- Obtain plant status information.
- Maintain a record of GSEP related activities.

TABLE 4.3-6

PROTECTIVE MEASURES DIRECTOR (CEOF)

The Protective Measures Director (CEOF) reports to the MEO (CEOF) and directs the activities of the Health Physics/Environmental Specialists (CEOF). The PMD (CEOF) is cognizant of offsite sampling/monitoring activities of CECo personnel and interfaces with State personnel regarding dose assessment programs, as appropriate. The PMD (CEOF) shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposure as low as reasonably achievable. When the EOF Organization assumes Command and Control, the PMD shall serve as a support individual for the Protective Measures Director (EOF).

Responsibilities assigned to the Protective Measures Director (CEOF) include:

- Provide recommendations for changes in radiological Emergency Action Level classification to the MEO (CEOF).
- Maintain cognizance of environmental sampling activities .
- Advise the MEO (CEOF) on the need for emergency exposure approval for CECo emergency workers.
- Advise the MEO (CEOF) on the need for administering thyroid blocking agents for CECo emergency workers.
- Based on environmental sampling or known plant releases, advise the MEO (CEOF) of Protective Action Recommendations (PARs) for plant personnel and members of the public.
- Assist in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- Coordinate additional radiological support as requested by the TSC.
- Advise the MEO (CEOF) of the need to staff the EOF based on degrading radiological or environmental conditions.
- Act as an alternate for review and approval of the State Agency Update Checklist.
- Determine the need for and contact Medical Department personnel for assistance.
- Maintain a record of GSEP related activities.

INTENTIONALLY BLANK

TABLE 4.3-7

HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)

The Health Physics/Environmental Specialists (CEOF) reports to the Protective Measures Director (CEOF). The Health Physics/Environmental Specialists (CEOF) shall monitor onsite and offsite radiological conditions to collect and disseminate information to the CEOF staff.

Responsibilities assigned to the Health Physics/Environmental Specialists (CEOF) include:

- Identify and trend critical radiological and meteorlogical parameters utilizing the Point History (PTHSTY) and Point Trend programs and the meteorological contractor.
- Evaluate pertinent dose projection data using the ODCS computer models as requested by the PMD (CEOF).
- Remain cognizant of forecast data and ensure that the status is updated periodically.
- Immediately notify the PMD (CEOF) of meteorological changes which may impact identification of downwind sectors.
- Interpret radiological data and provide Protective Action Recommendations (PARs) based upon calculated dose projections to the PMD (CEOF).
- Advise the PMD (CEOF) of changes in Emergency Action Level (EAL) classification based on effluent releases or dose projections.
- Monitor the GSEP Radio transmissions to remain cognizant of the Environmental Field Team activities and radiological conditions.
- Request additional equipment and personnel as necessary to supplement environmental monitoring efforts from unaffected CECo nuclear stations and/or an environmental contractor.
- Convey information pertaining to CECo Environmental Field Team activities and sample results to State authorities.
- Coordinate information flow between the CEOF and the affected State(s) environmental authorities.
- Maintain a record of GSEP related activities.

TABLE 4.3- 8

ADVISORY SUPPORT MANAGER (CEOF)

The Advisory Support Manager (CEOF) will provide support functions in organizational logistics and governmental interface. The ASM (CEOF) also shall maintain effective interfaces between State and local agencies by providing State agencies with periodic updates. The ASM (CEOF) reports to the MEO (CEOF). When the EOF Organization assumes Command and Control, the ASM (CEOF) will functionally serve as a support individual for the Advisory Support Manager (EOF).

Responsibilities assigned to the ASM (CEOF) include:

- Assist the MEO (CEOF) in the evaluation of the significance of an emergency with respect to the public.
- Prepare, approve and transmit the State Agency Update Checklist at least hourly.
- Maintain records of CEOF activities.
- Ensure that access to the CEOF is limited to Emergency Responders.
- Maintain a record of GSEP related activities.

TABLE 4.3-9

EMERGENCY PLANNER (CEOF)

The Emergency Planner (CEOF) is responsible for verifying that the CECo Generating Stations Emergency Plan (GSEP) is implemented effectively and assists the CEOF staff in facility utilization. The Emergency Planner (CEOF) reports to the MEO (CEOF).

Responsibilities assigned to the Emergency Planner (CEOF) include:

- Assist in activation of the CEOF.
- Act as a GSEP subject matter expert for the CEOF Organization.
- Operate the audio-visual system and telecommunications in the EMC as directed by the MEO (CEOF).
- Coordinate CEOF support services as necessary.
- Coordinate maintenance for CEOF equipment as necessary.
- Assist any CEOF personnel, as necessary, in using desired Computer Programs.
- Establish shift staffing for the CEOF using the GSEP Telephone Directory.
- Establish and maintain a CEOF Ingress/Egress Log and Fitness for Duty Verification documentation.
- Verify that the CEOF Organization is maintaining appropriate documentation of their activities.
- Maintain a record of GSEP related activities.

TABLE 4.3-10

INTENTIONALLY BLANK

TABLE 4.3-11

EMERGENCY RESTORATION OF POWER (ERP) DIRECTOR

The Emergency Restoration of Power (ERP) Director, located in the CECo Technical Center Office in Maywood, Illinois, shall coordinate the activities of Division personnel and equipment. The ERP Director shall provide for Division support to the affected station. Upon activation of the Corporate Emergency Response Organization, the ERP Director will coordinate with either the Nuclear Duty Officer or the Manpower/Logistics Director (EOF) .

Responsibilities assigned to the ERP Director include:

- Activate the Emergency Restoration of Power (ERP) Program as necessary to support the station activities.
- Inform the respective Division Director of support service required to meet the needs of the emergency response.
- Obtain additional support from other Divisions if the level of support requirements dictates.
- Maintain a record of GSEP related activities.

4.3.2 THE EOF ORGANIZATION

During incidents classified as Site or General Emergencies, the EOF Organization will be activated. The EOF Organization functions under a Manager of Emergency Operations who is responsible for the overall company activities aimed at restoring the affected station to a safe status. The CEOF Organization provides support to the EOF Organization under the arrangement detailed in Section 4.3.1. The EOF Organization, depicted in Figure 4.3-2, consists of the following personnel whose major duties are delineated in the referenced tables.

NOTE:

Some EOF Positions are required to be double staffed when a remote JPIC, such as Highland Park, is activated. These positions are indicated with an asterisk. One responder will report to the EOF and one will report to the remote JPIC.

Table 4.3-12 Manager of Emergency Operations

Table 4.3-13 Assistant MEO

Table 4.3-14 Technical Support Manager

Table 4.3-15 Technical Support Director

Table 4.3-16 Senior Reactor Operator (at EOF)

Table 4.3-17 Waste Systems Director

Table 4.3-18 Design & Construction Support Director

Table 4.3-19 Technical Information Coordinator

Table 4.3-20 EOF Status Board Recorders

Table 4.3-21 Technical Communicator (to TSC)

Table 4.3-22 ENS Communicator

Table 4.3-23 SPDS/PTHSTY Specialist

TABLE 4.3-14

TECHNICAL SUPPORT MANAGER (EOF)

The Technical Support Manager (TSM) is the designated CECo individual who has requisite authority, nuclear experience and technical expertise to manage a technical staff in support of Emergency Response operations. The Technical Support Manager shall report directly to the Manager of Emergency Operations.

Responsibilities assigned to the TSM include:

- Manage the activities of the Technical Support Group in the EOF.
- Provide recommendations for changes in Emergency Action Level classification to the Manager of Emergency Operations and participate in the decision-making process.
- Provide information to the Assistant MEO for completing the NARS Form.
- Provide the Manager of Emergency Operations with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- Coordinate the activities of the Technical Support Manager (CEOF).
- Supervise the activities of the Technical Support Director and monitor the progress in the performance of the Technical Support Director's responsibilities.
- Assist in the development of post-accident recovery measures.
- Provide technical information on the facility design.
- Ensure that modifications needed for plant recovery are implemented in a timely manner.
- Enlist the aid of consultants as necessary.
- Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-25

PROTECTIVE MEASURES DIRECTOR (EOF)

The Protective Measures Director (PMD) is the designated CECo individual who is specifically qualified in the management of radiological consequence assessment and who is authorized to interact with supporting agencies. This individual will supervise the environmental assessment functions at the EOF. The Protective Measures Director shall report to the Manager of Emergency Operations.

Responsibilities assigned to the Protective Measures Director include:

- Obtain input from the Protective Measures Coordinator concerning plant status that potentially may affect the public.
- Advise the Manager of Emergency Operations and Advisory Support Manager/Director concerning protective action recommendations.
- Advise the Manager of Emergency Operations and the Advisory Support Manager/Director concerning changes in accident classification based upon effluent releases or dose projections.
- Provide information to the Assistant MEO for completing the NARS Form.
- Coordinate the activities of the Protective Measures Director (CEOF).
- Direct the activities of the Health Physics Director and the Environmental Emergency Coordinator and monitor the progress in the performance of their responsibilities.
- Provide or delegate to the Environmental Emergency Coordinator the review of the Environmental portions of the State Agency Update Checklist.
- Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-26

HEALTH PHYSICS DIRECTOR (EOF)

The Health Physics Director (HPD) shall support the onsite Health Physics activities under the direction of the Protective Measures Director. The HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable. Responsibilities assigned to the Health Physics Director include:

- Direct the activities of the HPN Communicator(EOF).
- Direct the activities of any Radiation Technicians (RTs) in the EOF, as required (i.e. habitability checks, etc.)
- Assist the affected station in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- Determine the need for additional Health Physics instrumentation, dosimetry, protective equipment, and radiological support personnel.
- Review plant Health Physics information and make recommendations to the Protective Measures Director.
- Assist and interface with the EOF Technical Group and the Station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- Keep informed of the activities of offsite environmental monitoring teams.
- Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:
  - Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.
  - Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.
  - Coordinate the activities of contracted radiological medical assistance personnel.
  - Analyze all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.
  - Ensure that procedures governing the use of thyroid blocking agents have been followed by CECo emergency personnel.
  - Consult with the MEO regarding measures to protect onsite personnel and the offsite public.
- Maintain a record of GSEP related activities.

TABLE 4.3-28

ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)

The Environmental Emergency Coordinator (EEC) is the designated CECo individual who is specifically qualified in the coordination of radiological consequence assessment. The Environmental Emergency Coordinator shall report to the Protective Measures Director.

Responsibilities assigned to the Environmental Emergency Coordinator include:

- Ensure communications are established with the Corporate EOF, and/or the TSC to obtain information on the accident conditions, meteorological conditions, and estimates of radioactive material releases.
- Direct the activities of the Protective Measures Communicator, the State Environs Coordinator(s), and the EOF ODCS Specialist.
- Direct the activities of the EOF Environs Director and the environmental staff. Coordinate the activities of the TSC Environs Director and environmental contractors.
- Assist the Protective Measures Communicator in completing the Environmental portion of the State Agency update checklist.
- Interpret radiological data and provide Protective Action Recommendations (PARs) based upon calculated dose projections consistent with this plan and ensure Environmental Status Boards are updated as necessary.
- Identify changes in accident classification based on effluent releases or dose projections.
- Verify that information necessary to implement offsite emergency plans is collected and provided to the Protective Measures Director, including the environmental portion of the State Agency Update Checklist.
- Maintain a record of GSEP related actitivies.

TABLE 4.3-34

ADVISORY SUPPORT MANAGER (EOF)

The Advisory Support Manager (ASM) is the designated CECo individual who will manage the efforts of the Advisory Support Group located at the EOF. This group provides support functions in organizational logistics and governmental interface. The ASM shall report directly to the Manager of Emergency Operations (MEO).

Responsibilities assigned to the ASM include:

- Assist the MEO in the evaluation of the significance of the emergency with respect to the public.
- Assist the MEO in evaluating changes to the Emergency Classification.
- Provide information to the Assistant MEO for completing the NARS Form, as requested.
- Direct the activities of the ASM (CEOF).
- Act as an alternate for the review and approval of the State Agency Update Checklist prior to transmittal.
- Maintain records of information obtained from other EOF personnel, including contacts with offsite agencies, contractors and other support organizations.
- Advise the MEO concerning the status of activities relating to governmental interfaces and provide recommendations for improving these interfaces.
- Direct the activities of the Advisory Support Director and monitor the progress in the performance of the Advisory Support Director's responsibilities.
- Maintain a record of GSEP related activities or assign a designated alternate (i.e., Advisory Support Director) to do so.

TABLE 4.3-39

EMERGENCY PLANNER (EOF)

The Emergency Planner (EOF) is responsible for verifying that the CECo Generating Station Emergency Plan (GSEP) is implemented properly. The Emergency Planner (EOF) shall serve as a support individual for the Advisory Support Director (EOF).

Responsibilities assigned to the Emergency Planner (EOF) include:

- Monitor information flow within the EOF organization to ensure information requirements are being met.
- Assess the effectiveness of ongoing EOF working relationships and recommend functional enhancements to the Advisory Support Director.
- Verify that the EOF Organization is maintaining appropriate documentation of their activities.
- Act as a GSEP subject matter expert for any member of the Emergency Response Organization.
- Maintain a record of GSEP related activities.

TABLE 4.3-42

MANPOWER/LOGISTICS DIRECTOR (EOF)

The Manpower/Logistics Director is the designated CECo individual who is responsible for providing administrative, logistic, communications, and personnel support for the emergency response operations. The Manpower/Logistics Director shall report to the Advisory Support Director.

Responsibilities assigned to the Manpower/Logistics Director include:

- Direct the activities of the Communications Director and the Computer Specialist(s).
- Serve as purchasing agent for the EOF Organization with the responsibility for contract negotiation/administration and material control.
- Direct the clerical staff and ensure the clerical requirements for the other Directors, at the EOF, are met.
- Obtain continual shift staffing requirements from appropriate EOF Directors as necessary to coordinate the scheduling of relief individuals.
- Coordinate with the TSC's Administrative Director in ensuring that clerical support is obtained for the EOF and Emergency News Center Organization. These personnel should be obtained from a station or facility not affected by the emergency.
- Obtain services as appropriate to support operation of the EOF such as, accommodations, office support services, food services and waste disposal.
- Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.
- Initiate use of the special emergency response function number to charge emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.

(continued next page)

4.4 Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities

4.4.1 Criteria for Assuming Command and Control

Emergency personnel assume responsibility for their positions upon receiving notification to activate. Some will perform tasks related to fulfilling their responsibilities before arriving at an emergency facility. The command and control function, however, does not transfer from Control Room to TSC, from TSC to CEOF, from TSC to EOF, or from CEOF to EOF until certain criteria have been met. These criteria are:

1. Minimum staffing levels are met and sufficient personnel are available in the facility to determine classifications, to determine recommended protective actions, to notify state and local agencies and to maintain communications.
   (In the case of the Control Room, personnel are on-site 24 hours a day.)
2. Personnel in the facility have been fully briefed as to the status of the event and the currently proposed plan of action.
3. A formal statement of turnover between Shift Engineer and Station Director, between Station Director and Manager of Emergency Operations/Corporate MEO or between Corporate MEO and MEO have been made.

4.4.2 Essential Activities of the Command and Control ERF

The essential activities that must be performed once command and control has been assumed by an ERF are as follows:

- Determine Emergency Action Level classification.
- Determine Protective Action Recommendations (PARs) for the public and inplant workers.
- Notify state, local and federal agencies as appropriate.
- Maintain communications with their source of information.

4.4.3 Control Room/Station Minimum Staffing

For Nuclear Power Plants with a single Control Room, the minimum shift manning requirements for emergencies are determined by the number of operating Units (see Table 4.4-1). Since requirements for normal plant operations are the same as those shown in Table 4.4-1, the minimum staff will be on-site at all times to respond to emergencies.

NOTE

****
* Shift manning requirements for operating modes other than normal on-line operation are governed by plant Technical Specifications. *
****

CEOF Staffing

The full CEOF Organization described in Section 4.3.1 shall be present before the CEOF assumes Command and Control responsibilities. This staff parallels the EOF Minimum Staff capabilities.

EOF Minimum Staffing

The minimum staff for the Emergency Operations Facility is as follows:

- Manager of Emergency Operations (EOF)
- Technical Support Manager (EOF)
- One other member of the Technical Group from Figure 4.3-2
- Protective Measures Director (EOF)
- Environmental Emergency Coordinator (EOF)
- ODCS Specialist (EOF)
- Advisory Support Manager (EOF)
- Emergency Planner (EOF)

4.4.6 Nondelegable Responsibilities of Command and Control

Regardless of the facilities activated during any emergency, the Director or Manager in Command and Control of the Emergency Response at any given time, shall maintain the following nondelegable responsibilities:

1) Final decision to declare the emergency classification.

2) Final decision to notify and make PARs to offsite authorities .

3) Authorization of personnel exposure beyond 10CFR20 limits under emergency conditions.

4) Issuance of thyroid blocking agents to CECo emergency workers and onsite personnel.

4.7.3 Federal Radiological Preparedness Coordinating Committee (FRPCC)

The Federal Radiological Preparedness Coordinating Committee consists of the Federal Emergency Management Agency, which chairs the Committee, the Nuclear Regulatory Commission, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Department of Defense, the Department of Agriculture, the Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. The FRPCC shall assist FEMA in providing policy direction for the program of Federal assistance to State and local governments in their radiological emergency planning and preparedness activities.

4.7.4 Department of Energy (D.O.E.) Chicago Operations Office

The Department of Energy has extensive radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident.

Upon request, the Department of Energy (DOE) Chicago Operations Office will provide assistance to Commonwealth Edison following a radiological incident as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The objective of the DOE Chicago Operations Office would be to rapidly dispatch a team of specialists to the incident site where the team would:

1) Make needed radiological assistance available to the general public, State and local governments, and Federal agencies;

2) Provide a framework through which Federal agencies will coordinate their emergency monitoring and assessment activities in support of State and local governments radiological monitoring and assessment activities; and

3) Assist State and local governments in preparing for radiological emergencies by describing Federal radiological assistance responsibilities and capabilities.

4) Establish a Federal Radiological Monitoring and Assessment Center, as necessary, from which it will manage its activities.

If assistance from DOE is necessary or desirable, the affected State(s) would notify the DOE Chicago Operations Office.

The primary mechanisms utilized for notifications and transmittal of information include the State of Illinois NARS Form, the NRC Event Notification Worksheet and the State Agency Update Checklist. The reporting requirements and the use of these forms will be described below:

NOTE:

The offsite notification requirements for NARS, NRC notifications and State Agency Update Checklists are the responsibility of the facility in Command and Control. The NRC ENS and HPN notification responsibilities shall remain with the Station until the EOF assumes Command and Control. Other activated facilities shall assist in the acquisition of information on these forms.

6.1.1.1 State of Illinois NARS Form

A NARS Form (Figure 6.1-1a) shall be utilized to transmit information to appropriate State and local agencies within fifteen minutes of event declaration. (See Section 5.0). All NARS messages shall be reported in the format of the current NARS Form. The format and content of the NARS Form must be mutually agreed to by the Directors of Illinois Emergency Services and Disaster Agency (IESDA) and Illinois Department of Nuclear Safety (IDNS) and the General Manager of Nuclear Services before its use. The NARS Form is a State of Illinois form included in the GSEP to aid the reader in understanding the reporting concept. The NARS Form, including instructions for its use on the reverse side, is included in this Section.

This form is not subject to onsite or offsite review.

6.1.1.2 NRC Event Notification Worksheet

An NRC Event Notification Worksheet should be utilized to transmit information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. A copy of the Event Notification Worksheet is not included in this plan, but should be available in all locations containing an Emergency Notification System phone.

This form is not subject to onsite or offsite review.

TABLE 6.1-1
PRIMARY EMERGENCY RESPONSE ACTIONS FOR UNUSUAL EVENT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is an nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated if deemed appropriate.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant.
- o Terminate if conditions warrant.
- o Provide periodic State Agency Updates.

2) SYSTEM POWER DISPATCHER

a. Record NARS form information, as appropriate
b. Immediately notify the Nuclear Duty Officer

TABLE 6.1-2
PRIMARY EMERGENCY RESPONSE ACTIONS FOR ALERT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is an nondelegable responsiblity of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Downgrade to Unusual Event if conditions warrant.
- o Enter Recovery or terminate as conditions warrant.
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.

TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. If CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

a. Call affected station - verify plant status and event classification

NOTE:

If a Significant Alert classification is declared, then the CEOF Organization shall be activated.

b Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations) as required.
c. If an EOF is to be activated, ensure access control is initiated.
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.1-3
PRIMARY EMERGENCY RESPONSE ACTIONS FOR SITE EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
- o Initiate assembly and accountability.

b. Authorize initial notifications to the following (Authorization of initial State notifications is an nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Do not downgrade.
- o Enter Recovery or Terminate as conditions warrant.
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
- o Dispatch environs monitoring teams
- o Conduct evacuation of non-essential personnel

TABLE 6.1-3 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. When CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF) .

3) NUCLEAR DUTY OFFICER

a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations).
b. Call affected station - verify plant status and event classification .
c. Ensure EOF access control has been initiated.
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.3-4
PRIMARY EMERGENCY RESPONSE ACTIONS FOR GENERAL EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
- o Initiate assembly and accountability.

b. Authorize initial notifications to the following (nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated, if deemed appropriate.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Do not downgrade classification.
- o Enter Recovery or Terminate as conditions warrant.
- o Provide State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
- o Dispatch environs monitoring teams
- o Conduct evacuation of non-essential personnel

TABLE 6.1-4 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. When CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations).
b. Call affected station - verify plant status and event classification .
c. Ensure EOF access control has been initiated.
d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF and EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

TABLE 6.1-5

PRIMARY EMERGENCY RESPONSE ACTIONS FOR RECOVERY

1) STATION DIRECTOR/MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Evaluate the guidance in Section 5.0 of this plan to determine if Recovery is appropriate.
b. Declare Recovery to be in effect (nondelegable responsibility of Command and Control)
c. Ensure notification of the following:
   - o System Power Dispatcher
   - o Illinois ESDA and DNS
   - o Iowa Disaster Services Division (for Quad Cities Station only)
   - o Wisconsin Division of Emergency Government (for Zion Station only)
   - o Contiguous local authorities as required
   - o NRC
   - o ANI
   - o INPO

d. Evaluate parameters, environmental conditions and other information to determine what long-term organization is required for Recovery.
e. Schedule personnel, material, and equipment necessary to support Recovery.
f. Provide mechanisms, if required, for periodic plant status and meteorological information to ESDA/DNS and contiguous state authorities.
g. Determine level of activation and/or manning of emergency response facilities if preplanned events are to occur that have a potential (possibility) of impacting upon the health and safety of the public, CECo personnel, plant equipment, and/or the environment.
h. With the concurrance and approval of the Senior Vice President, Nuclear Operations, modify the Station Emergency Response Organization (i.e., Control Room, OSC and TSC) and the Corporate Emergency Response Organization (i.e., CEOF, EOF, and Emergency News Center) as necessary to support recovery efforts.

7.1.4 Corporate EOF (CEOF)

The Corporate EOF (CEOF) is the location from which the Manager of Emergency Operations (CEOF) will direct a staff in evaluating, coordinating, and directing the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of a Significant Alert, a Site Emergency or General Emergency.

When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF is also the official backup EOF for Zion Station. The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- Technical Support personnel
- Advisory Support personnel
- Environmental Assessment personnel
- Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

7.1.5 Emergency Operations Facility (EOF) (cont'd)

The four (4) primary EOFs (Mazon EOF to serve Dresden, Braidwood and LaSalle County Stations, Dixon EOF for Byron Station, Morrison EOF for Quad Cities Station, and Zion EOF for Zion Station) are constructed according to the design criteria such that:

1) The location provides optimum functional and availability characteristics for carrying out overall strategic direction of CECo onsite and support operations, determination of public protective actions to be recommended to offsite officials, and coordination with Federal, State and local organizations.

2) They are well engineered for the design life of the plant and are of sufficient size to accommodate about 50 people. The Zion Station EOF, because of its close proximity to the station, is provided with additional radiological protection features. It also has a backup facility located in Downers Grove should the EOF become uninhabitable.

3) They are equipped with reliable voice communications capabilities to the TSC, the OSC, the CEOF, the Control Room, NRC, and State and local emergency operations centers. In addition, each EOF has facsimile transmission capability.

4) Equipment is provided to gather, store, and display data needed in the EOF to analyze and exchange information on plant conditions with the Station Director in the TSC.

5) The EOF technical data system receives, stores, processes, and displays information sufficient to perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition.

6) They have ready access to plant records, procedures, and emergency plans needed for effective overall management of CECo emergency response resources.

7.1.6 JOINT PUBLIC INFORMATION CENTER (JPIC)

The Joint Public Information Center (JPIC) is the facility in which media personnel gather to receive information related to the emergency event. The JPIC may or may not be in the same physical location as the EOF.

Emergency News personnel operate from the Joint Public Information Center (JPIC), which is under the direction of the Public Information Manager and functions as the single point contact to interface with Federal, State, and local authorities who are responsible for disseminating information to the public. The Public Information Manager and appropriate technical spokespersons shall be available to brief the press at the JPIC.

Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 5, 1993

Mr. John B. Hickman
Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulations
U.S. NRC
Washington, D.C. 20555

Subject: Response to Request for Additional Information Related to the Proposed Generating Station Emergency Plan (GSEP) Revision Incorporating the Corporate EOF as an Interim EOF, GSEP Change Request Number 93-01

Reference: 1) Letter from D. Saccomando (CECo) to Mr. A.Bert Davis (NRC), dated March 31, 1993;Re:"Submittal of Change Request Number 93-01 to the Commonwealth Edison Generic Generating Station Emergency Plan (GSEP) for NRC Review and Approval."

2) Letter from John B. Hickman (NRR) to Mr. D. L. Farrar, dated May 19, 1993; Re: "Request for Additional Information Related to the Proposed GSEP Revision Incorporating the Corporate EOF as an Interim EOF."

3) NRC Enspection Report; dated August 20, 1992 (Nos. 50-237 and 249/92022, 50-254 and 265/92019, et. al..)

Dear Mr. Hickman:

With regards to Commonwealth Edison Company's (CECo's) March 31, 1993, submittal (Reference 1) proposing a revision to its Generating Station Emergency Plan (GSEP), the NRC requested that CECo provide additional information (Reference 2) to determine whether the company's revision, "resolve(s) the NRC concerns with the staffing of the CECo near-site EOFs." The additional information requested by your office is provided as an Enclosure to this letter. This information was discussed in a July 21, 1993, conference call between CECo, NRR and NRC Region III personnel.

CECo initially proposed the use of the Corporate Emergency Operations Facilities (CEOF) as an interim EOF in response to concerns identified during an NRC Region III inspection (Reference 3). CECo met with NRC Region III on September 17, 1992 and NRR on December 1, 1992 to discuss CECo's offsite emergency response strategy and the proposed use of CEOF as an interim EOF.

CECo's proposed revision involves activation of it's CEOF, in Downers Grove, as an interim EOF for all of the company's nuclear facilities while the near-site EOF is activated. The interim use of the CEOF during the initial stages of an emergency represents an increase in our commitment to Emergency Preparedness, public health and safety. The use of the CEOF does not diminish the importance of the near-site EOF. The administrative changes made to enhance the CEOF activation time to meet the one hour "goal", have served to reduce the near-site EOF staffing times.

CECo's emergency response strategy has been designed to best use its extensive personnel and resources. This approach involves using personnel from the corporate office and unaffected stations to staff the near-site EOF, and affected station personnel to respond to their own onsite emergency response facilities. In CECo's view, this strategy optimizes the use of CECo's senior management resources to make key onsite and offsite emergency response decisions, while allowing the affected station to focus on onsite response.

The CEOF will be staffed consistent with the one hour "goal" given in NUREG-0654 (and NUREG-0737, Supp. 1). The near-site EOF will assume emergency management responsibility as soon as possible once the near-site EOF is activated. It is CECo's position that the staffing of the CEOF within the one hour "goal", and simultaneous staffing of the near-site EOF at the Site and General Emergency, meet NRC response criteria in NUREG-0654 (and NUREG-0737, Supp.1).

We would like to stress that the proposed change to the GSEP does not reduce the importance of a near-site EOF. Rather, the proposed change has increased and realigned the minimum staff at the near-site EOF so that it will be even better able to effectively execute expected functions. As a result of this plan change, the minimum staff at the EOF has been increased from six to eight individuals through expansion in the Protective Measures and Technical areas. By using the CEOF, additional support will be

provided to the TSC with the addition of the eight person CEOF staff. The CEOF, as the licensed Backup EOF for Zion Station, has the comparable physical capabilities of a near-site EOF.

Additionally, since the CEOF will be activated at a lower threshold than the near-site EOF (Alert verses Site Emergency), it should be in place to provide support to the TSC if the event were to escalate to a Site or General Emergency. If the initiating event is a Site or General Emergency, the near-site EOF will be simultaneously activated with the CEOF.

The use of an interim offsite emergency response facility is not new to CECo. Previous GSEP revisions have included the use of the CEOF (or the Corporate Command Center (CCC) prior to GSEP Revision 7) as an interim facility. The proposed use of the CEOF is an enhancement over the previous CEOF/CCC concept in that activation is mandated at an Alert classification and required during any hour. The NRC has previously evaluated the use of the CEOF/CCC during exercises, and has not identified any major functional discrepancies.

CECo's interim EOF proposal is distinguishable from previous non-CECo EOF approaches which the Commission has considered as our approach still maintains the traditional near-site EOF.

Please direct any questions you or your staff may have regarding this matter to Ms. Irene Johnson at (708)663-2095 or Ms. Leslie Holden at (708)663-6673.

Very Truly Yours,

Irene M. Johnson

for D. Saccomando
Nuclear Licensing

DS/LH/ktd

Enclosure

cc: R. Emch - NRR
R. Pedersen - NRR
J. McCormick-Barger - NRC Region III
NRC Resident Inspector - Dresden, w/o enclosure
NRC Resident Inspector - Braidwood, w/o enclosure
NRC Resident Inspector - Byron, w/o enclosure
NRC Resident Inspector - Zion, w/o enclosure
NRC Resident Inspector - LaSalle, w/o enclosure
NRC Resident Inspector - Quad Cities, w/o enclosure
NRC Document Control Desk

LH.wpf34

ENCLOSURE

USNRC Request for Additional Information
Related to the Proposed GSEP Revision
Incorporating the Corporate EOF as an Interim EOF
(May 19, 1993)

Question 1: Goal for Staffing Near-site EOF

Attachment A to the March 31, 1993, CECO letter, which transmitted Revision 93-01 to the GSEP, states, "Our approach involves staffing a corporate EOF within the one hour "goal" while a near-site EOF is being staffed." In revision 93-01 to the GSEP, the "goal" for staffing a near-site EOF is not stated.

State the "goal" for staffing the near-site EOF for each of CECo's nuclear plant sites.

Response:

GSEP Revision 93-01 proposed the use of the CEOF to meet the one hour "goal" delineated in NUREG-0737. We believe with reasonable certainty that the CEOF can be staffed within the one hour "goal" and perform the necessary functions of an EOF until a near-site EOF is activated. Furthermore it is our belief that the near-site EOF staffing times remain commensurant with the offsite agency response. As such, no additional burden is placed on the TSC during the time that a near-site EOF is being staffed.

CECo continues its efforts to enhance staff augmentation methods with the intent of reducing near-site EOFs staffing times. Until additional enhancements have been implemented and collectively evaluated, definitive EOF response times are not meaningful. Based on the time study analysis discussed in response to Question 2, CECo proposes an interim "goal" for Minimum Staff at a near-site EOF of 1-1/2 to 3 hours, based on normal travel considerations for offhours activation. After further enhancements have been made, this time will be reevaluated.

Question 2: Results of Staffing Augmentation Analysis

Attachment A to the March 31, 1993, CECO letter indicates that efforts are being made to reduce the time for staffing the near-site EOFs, which include modeling of response times. Provide supporting documentation (time studies and results of actual augmentation drills) which demonstrates that CECo's "goal" for staffing near-site EOFs and the CEOF for each nuclear plant site is reasonably attainable in an actual event. In addition, provide a "to scale" map or diagram which indicates the location of each of CECo's nuclear plants, EOFs and the CEOF.

Response:

Time studies, based on survey response times, indicate EOF minimum staffing times to be from about 1-1/2 hours to 3 hours. These time studies serve as the basis for the EOF Minimum Staffing interim "Goal" discussed in the response to Question 1.

The results of these time studies indicate the following Minimum Staffing times for the near-site EOFs:

TIME STUDY RESULTS

	Minimum Staff (hours)*
Dixon	2-1/2 to 3
Mazon	1-1/2 to 2
Morrison	2-1/2 to 3
Zion	2 to 3

*(To the nearest half hour.)

Since the augmentation process has been under revision, the drill response times obtained to date may not accurately reflect current staffing times. Until enhancements are completed and times are substantiated through the conduct of after hour augmentation drills, definitive response times are difficult to ascertain.

Included, for your information, is a to-scale map which indicates the location of CECo's near-site EOFs, the CEOF and the nuclear stations.

Question 3: CEOF Staffing Goal

Attachment A to the March 31, 1993 letter states, "the CEOF can be expected to be staffed off hours within the one hour "goal" (55 to 75 minutes) after callout initiation." It is not clear how the time of "callout initiation" relates to the time the event is declared. The "goal" for staff augmentation as provided in Supplement 1 to NUREG-0737 is based upon the time the event is declared.

Provide justification for having a staffing "goal" for the CEOF based upon the time of "callout initiation" instead of the time an event is declared. Provide the relationship between the time of "callout initiation" and the time that an event is declared.

Response:

To be consistent with the timing given in NUREG-0737, Supplement 1, Commonwealth Edison will adjust the CEOF augmentation staffing "goal" to include the time from when the event is declared.

The 55 to 75 minute staffing time given in Reference 1 was based on the time that the Nuclear Duty Officer (NDO) initiates activation. The Commonwealth Edison notification procedure leading to the NDO initiating activation consists of:

1) Transmission of the Nuclear Accident Reporting System (NARS) form to the state/locals and to a Commonwealth Edison Load Dispatcher. The NARS form issued by the station contains the time of event classification.

2) The Load Dispatcher notifies the Nuclear Duty Officer and records the time of notification on his copy of the NARS form.

In order to determine the time between declaration and NDO notification, Commonwealth Edison reviewed the Load Dispatcher's copy of 20 actual emergency classifications at the six nuclear sites during a two year period. The results of this review indicated the average time required to notify the Nuclear Duty Officer was 16 minutes from the time of event classification. This time will be absorbed into our one hour "goal".

Question 4: Minimum Staffing

GSEP Section 4.4, "Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities," states that the emergency response facility which is in command and control must perform the following essential activities:

- Determine Emergency Action Level Classification;
- Determine Protective Action Recommendations (PARs);
- Notify State, local, and Federal agencies as appropriate; and
- Maintain communications with their source of information.

The GSEP also specifies the minimum staffing level required for each of the emergency response facilities. It is not clear how the "minimum" staff will be able to perform all of the required functions. For example, the minimum staff for the EOF includes the Manager of Emergency Operations, Protective Measures Director, Technical Support Manager, Advisory Support Manager, Environs Director, or one other Director or Communicator.

Provide additional information which demonstrates that the minimum staff will be able to perform the required functions for each of the emergency response facilities, including the CEOF. In particular, provide information regarding how the CEOF will communicate with Federal agencies, including the NRC.

Response:

In support of the proposed GSEP revision, a review of the functions delinated in NUREG-0737 was performed. Several Managers of Emergency Operations (MEO) who had participated in previous exercises utilizing the CEOF were interviewed to determine what additional personnel may be required to perform the functions of an EOF. As a result, a proposed CEOF staff was developed which is an expanded and enhanced version of that which was communicated to you at our December 1, 1992, meeting.

GSEP Revision 93-01 proposed the following CEOF staff:

1) Manager of Emergency Operations,
2) Technical Support Manager,
3) Technical Specialist,
4) Advisory Support Manager,
5) Emergency Planner,
6) Protective Measures Director, and
7) and 8) Health Physics and Environmental Specialists [Two(2)].

CECo also has proposed parallel changes for the EOF Minimum Staff. The proposed Minimum Staff for the EOF is as follows:

1) Manager of Emergency Operations,
2) Technical Support Manager,
3) One other member of the Technical Group,
4) Advisory Support Manager,
5) Emergency Planner,
6) Protective Measures Director,
7) Environmental Emergency Coordinator, and
8) ODCS Specialist.

Attachments A and B indicate which positions in the CEOF and the EOF are responsible for the functions identified in GSEP Section 4.4.1. Attachments C and D address communication responsibilities for the previously identified GSEP positions with offsite agencies. The Attachments also reference the appropriate Corporate Emergency Plan Implementing Procedures (CEPIPs) where specific direction is provided regarding these functions.

With regard to the CEOF maintaining communication with the NRC, it is CECo's intent to have the Technical Support Center (TSC) remain as the primary communication point with the NRC until the EOF assumes responsibility for emergency management. The MEO (CEOF) has the responsibility to ensure that the TSC is maintaining adequate communication with the NRC. During the initial phases of an event, the TSC will be able to provide a more accurate and timely response to plant conditions than would either the CEOF or the EOF. Additional information is provided via the Emergency Response Data System (ERDS) which provides real time plant data to the NRC for independent assessment.

Communication via the Emergency Notification System (ENS) and Health Physics Network (HPN) will be maintained by dedicated communicators in the TSC, until their EOF counterpart communicators arrive. Even then, the TSC ENS and HPN communicators remain on the line.

It is expected that the response time of the NRC and other agencies to an EOF would be commensurate with the CECo EOF response time, and as such we would not expect the NRC to communicate with the CEOF. However if need arose for communication between the NRC and the CEOF, it would be accomplished via commercial phone lines.

NRC (Region III) observed the CEOF during the LaSalle Exercise on March 31, 1993, and the Braidwood Exercise on June 23, 1993. Overall performance was characterized as excellent in the LaSalle Inspection Report (IR 50-373 & 374/93012), and as very good in the Braidwood Inspection Report (IR 50-456 & 457/93015). In the past, Commonwealth Edison has utilized the Corporate Command Center (CCC) as an interim EOF, similar in function to the CEOF. NRC observation of the performance in the CCC had not indicated any concerns over the ability of the CCC staff, which is smaller than the current proposed CEOF staff, to perform necessary functions.

Question 5: Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECo proposal.

Provide documentation regarding coordination with the affected State and local governments on the time "goal" for the staffing of the CECo near-site EOFs and the use of the CEOF as an interim EOF until the near-site EOFs are staffed.

Response:

Interface for coordination of emergency response activities with State and local governments during an emergency is initiated with the first phone call from the control room. Interface with State and local authorities for purposes of decision making transfers with responsibility for emergency management as it passes to the TSC, CEOF or EOF.

In all cases, State decisionmakers operate out of Emergency Operations Centers (EOCs) located in their respective state capitals. Local decisionmakers operate out of county EOCs. No State or local decisionmakers come to the EOF.

State personnel, who eventually arrive at the EOF, act as liaisons. As liaisons, they monitor information being provided through official channels to ensure information is being provided accurately and timely. Liaisons have no authority to make decisions for the agency they represent.

In the unique case of Illinois, plant data are transmitted twenty four hours a day via computer to Springfield. The Illinois Department of Nuclear Safety (IDNS) not only gathers information from the data link but also from a real time Gaseous Effluent Monitoring System and a system of Reuter-Stokes radiation monitors (which are located in a ring near the site) on a continuous basis. As a result of the Memorandum of Understanding (MOU) between IDNS and NRC, the IDNS resident engineers report to the TSC as their emergency response location. These resident engineers remain at the TSC even after the EOF is manned. The resident engineers act as liaisons to the TSC and monitor information flow for the Illinois Department of Nuclear Safety.

Wisconsin and Iowa are provided information via telephone communications. In addition, a dedicated Decisionmakers Conference Line has been provided at Zion and Quad Cities. The Decisionmakers Conference Line connects the Station Director in the TSC or the Manager of Emergency Operations in the CEOF or EOF with the Radiological Emergency Assessment Center (REAC) Commander (IDNS), and the State Radiological Coordinator (Iowa, or Wisconsin, as appropriate). This dedicated link allows for rapid consultation on protective action decisions.

None of the counties in Illinois, Iowa or Wisconsin dispatches representation to CECo's EOFs. Counties in Illinois receive initial notification from the Illinois Emergency Management Agency (IEMA). Scott and Clinton counties in Iowa are notified at the Unusual Event (UE) and Alert level by the Iowa Emergency Management Division (IEMD) and at the Site Area Emergency (SAE) and General Emergency (GE) level by CECo. Kenosha County, Wisconsin is notified by CECo at all classification levels.

Supporting information to the counties is provided by the states either by phone or by state liaisons in the county EOC. CECo also dispatches a representative to the county EOCs. CECo representatives are called out with the EOF staff and have arrival times commensurate with that to an EOF and with state representatives for a given county.

In the event that a General Emergency were the initiating event, CECo recommends protective actions directly to States and Counties simultaneously. In this event, counties would most likely take protective actions before any facility (i.e. a TSC, EOF, or State EOC) were manned.

Question 6: Significant Alert Classification

CECo has introduced a new Emergency class called the Significant Alert, which is defined as "those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5."

The staff is concerned whether the complexity added to the emergency response due to the introduction of another emergency class, i.e., the Significant Alert, with the sole purpose of activating the CEOF at a lower class than the Site Emergency, is warranted. It is not clear whether State and local officials will be notified of a "Significant Alert" or "Alert" when the event meets the criteria for a "Significant Alert."

Provide additional justification for incorporating the "Significant Alert" classification which addresses these staff concerns.

Response:

The "Significant Alert" is not a new emergency classification, but rather a trigger for events which warrant activation of the CEOF. Our review of events indicates only a small number of additional CEOF activations would result if the CEOF were activated at all events classified as Alerts. Therefore CECo will delete the "Significant Alert" concept from the GSEP and will activate the CEOF for all events classified as Alert (or higher). This change will require CECo to revise several pages to the proposed GSEP change. This will be done by October 15, 1993. A draft of these proposed changes is provided in Attachment E for your information.

ENCLOSURE

Attachment A

CORPORATE EMERGENCY OPERATIONS FACILITY (CEOF)

EMERGENCY ACTION LEVELS (EALS)

Function	GSEP Position	Procedure
FINAL DECISION		
	Manager of Emergency Operations	CEPIP 2200-01
ADVISE/RECOMMEND		
Plant	Technical Support Manager	CEPIP 2210-01
Radiological	Protective Measures Director	CEPIP 2220-01
MONITOR CONDITIONS		
Plant	Technical Specialist	CEPIP 2211-01
Radiological	Health Physics/Environmental Specialists	CEPIP 2221-01

PROTECTIVE ACTION RECOMMENDATIONS (PARS)

FINAL DECISION		
	Manager of Emergency Operations	CEPIP 2200-01
ADVISE/RECOMMEND		
	Protective Measures Director	CEPIP 2220-01
MONITOR CONDITIONS		
	Health Physics/Environmental Specialists	CEPIP 2221-01

NOTIFICATION/COMMUNICATION

STATE	Manager of Emergency Operations	CEPIP 2200-01
	Advisory Support Manager (Via the Nuclear Accident Reporting System (NARS))	CEPIP 2230-01
	Health Physics/Environmental Specialists	CEPIP 2221-01
LOCAL	Illinois Emergency Management Agency (IEMA) - Not CECo - notifies local agencies. (For Iowa and Wisconsin, counties are notified via the NARS.)	
NRC	Manager of Emergency Operations (Ensures TSC makes notifications.)	CEPIP 2300-01

ENCLOSURE

Attachment B

EMERGENCY OPERATIONS FACILITY (EOF)

EMERGENCY ACTION LEVELS (EALS)

Function	GSEP Position	Procedure
FINAL DECISION		
	Manager of Emergency Operations	CEPIP 2300-01
ADVISE/RECOMMEND		
General	Assistant Manager of Emergency Operations	CEPIP 2300-02
Plant	Technical Support Manager	CEPIP 2310-01
Radiological	Protective Measures Director	CEPIP 2320-01
MONITOR CONDITIONS		
Plant	Technical Support Director	CEPIP 2310-02
Radiological	Environmental Emergency Coordinator	CEPIP 2322-01

PROTECTIVE ACTION RECOMMENDATIONS (PARS)

FINAL DECISION		
	Manager of Emergency Operations	CEPIP 2300-01
ADVISE/RECOMMEND		
	Assistant Manager of Emergency Operations	CEPIP 2300-02
	Protective Measures Director	CEPIP 2320-01
MONITOR CONDITIONS		
	Environmental Emergency Coordinator	CEPIP 2322-01
	ODCS Specialist	CEPIP 2322-01

NOTIFICATION/COMMUNICATION

STATE	Manager of Emergency Operations	CEPIP 2300-01
	Assistant Manager of Emergency Operations (Via the Nuclear Accident Reporting System (NARS))	CEPIP 2300-02
	Advisory Support Manager	CEPIP 2330-01
	Governmental Communicator	CEPIP 2332-02
	State Environs Coordinator	CEPIP 2322-03
LOCAL	Illinois Emergency Management Agency (IEMA) notifies local agencies. (For Iowa and Wisconsin, counties are notified via the NARS.)	
NRC	ENS Communicator	CEPIP 2315-03
	HPN Communicator	CEPIP 2321-02

ENCLOSURE

Attachment C

CORPORATE EMERGENCY OPERATIONS FACILITY (CEOF)
COUNTERPART SOURCES FOR INFORMATION

	Procedure
Manager of Emergency Operations (CEOF) to: - Station Director	CEPIP 2200-01
Technical Support Manager (CEOF) to: - Technical Director (TSC)	CEPIP 2210-01
Technical Specialist (CEOF) to: - Technical Communicator (TSC)	CEPIP 2211-01
Protective Measures Director (CEOF) to: - Radiation Protection Director (TSC)	CEPIP 2220-01
Health Physics/Environmental Specialist (CEOF) to: - Environs Director (TSC) - ODCS Specialist (TSC) - Illinois Department of Nuclear Safety (IDNS) - Wisconsin Department of Emergency Government (WDEG)-State EOC (Zion only) - Iowa Emergency Management Division (IEMD) (Quad Cities only)	CEPIP 2221-01
Advisory Support Manager (EOF) to: - Assistant Station Director (TSC)	CEPIP 2230-01

ENCLOSURE

Attachment D

EMERGENCY OPERATIONS FACILITY (EOF)
COUNTERPART SOURCES FOR INFORMATION

	Procedure
Manager of Emergency Operations (EOF) to: - Station Director - Manager of Emergency Operations (CEOF)	CEPIP 2300-01
Technical Support Manager (EOF) to: - Technical Support Manager (CEOF)	CEPIP 2310-01
Technical Support Director (EOF) to: - Technical Director (TSC)	CEPIP 2310-02
Station SRO to: - Operations Director (TSC)	CEPIP 2312-01
Technical Communicator (EOF) to: - Technical Communicator (TSC) - Technical Specialist (CEOF)	CEPIP 2315-02
ENS Communicator (EOF) to: - ENS Communicator (TSC) - NRC (ENS)	CEPIP 2315-03
SPDS/PTHSTY Specialist (EOF) to: - Technical Specialist (CEOF)	CEPIP 2315-04
Protective Measures Director (EOF) to: - Protective Measures Director (CEOF)	CEPIP 2320-01
Health Physics Director (EOF) to: - Radiation Protection Director (TSC)	CEPIP 2321-01
HPN Communicator (EOF) to: - HPN Communicator (TSC) - NRC (HPN)	CEPIP 2321-02
Protective Measures Communicator (EOF) to: - Environs Staff (TSC)	CEPIP 2322-02

ENCLOSURE

Attachment D (continued)

EMERGENCY OPERATIONS FACILITY (EOF)
COUNTERPART SOURCES FOR INFORMATION

Function	GSEP Position	Procedure
State Environs Coordinator (EOF) to:	- Illinois Department of Nuclear Safety (IDNS) - Wisconsin Department of Emergency Government (WDEG)-State EOC (Zion only) - Iowa Emergency Management Division (IEMD) (Quad Cities only)	CEPIP 2322-03
ODCS Specialist (EOF) to:	- ODCS Specialist (TSC) - Health Physics/Environmental Specialist (CEOF) - Murray and Trettel (Weather forecast)	CEPIP 2322-04
Environs Director (EOF) to:	- Environs Director (TSC)	CEPIP 2322-05
GSEP Radio Communicator (EOF) to:	- Field Team Communicator (TSC)	CEPIP 2322-05A
Advisory Support Manager (EOF) to:	- Advisory Support Manager (CEOF)	CEPIP 2330-01
Manpower and Logistics Director (EOF) to:	- Administrative Director (TSC)	CEPIP 2331-01
Emergency Planner (EOF) to:	- Emergency Planner (CEOF) - EP Advisor (TSC) (if applicable)	CEPIP 2333-01
Safeguards Specialist (EOF) to:	- Security Director (TSC)	CEPIP 2334-01

ATTACHMENT E

REVISIONS TO PROPOSED GSEP CHANGE 93-01
(For information only)

SECTION 2 (continued)

		Page Number
2.19	GSEP	2-4
2.20	HAZARDOUS MATERIAL	2-4
2.21	IMMINENT	2-5
2.22	MONTHLY	2-5
2.23	NON-ESSENTIAL SITE PERSONNEL	2-5
2.24	NUCLEAR STATION	2-5
2.25	OFFSITE	2-5
2.26	ONSITE	2-5
2.27	POTENTIAL	2-5
2.28	PROBABLE	2-6
2.29	PROJECTED DOSE	2-6
2.30	PROTECTED AREA	2-6
2.31	PROTECTIVE ACTION GUIDES (PAGs)	2-6
2.32	PROTECTIVE ACTION RECOMMENDATIONS (PARs)	2-6
2.33	PROTECTIVE ACTIONS	2-6
2.34	QUARTERLY	2-7
2.35	SEMI-ANNUAL	2-7
2.36	SHALL, SHOULD AND MAY	2-7
2.37	*INTENTIONALLY BLANK*	2-7
2.38	SITE BOUNDARY	2-7
2.39	STANDBY	2-7
2.40	THYROID BLOCKING AGENT	2-8
2.41	VITAL AREAS	2-8
2.42	VITAL EQUIPMENT	2-8
2.43	WEEKLY	2-8
2.44	WORST CASE METEOROLOGY	2-8

2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 *INTENTIONALLY BLANK*

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

* The CEOF Organization
* The EOF Organization
* The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEOF) and Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal, State, and local authorities.

The CEOF will be activated at an Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).

The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the Manager of Emergency Operations. The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control. Once the EOF Organization is activated, the CEOF Organization becomes support staff to the EOF. (See Section 4.0).

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the Manager of Emergency Operations (CEOF) will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of an Alert, Site Emergency or General Emergency. When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, Manager of Emergency Operations (CEOF) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

SECTION 4.3.1 CEOF Organization
SECTION 4.3.2 EOF Organization
SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECo's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Alerts, Site and General Emergencies. CEOF activation for Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEOF) .

NOTE:

The roles of the System Power Supply Office and the Nuclear Duty Officer are unique in that they may be considered as parts of the overall Corporate Emergency Response, but do not hold specifically identified positions within the CEOF Organization, the EOF Organization, or the ENC Organization. For a description of their general responsibilites as they pertain to the GSEP, refer to the following referenced Tables:

Table 4.3-1 System Power Supply Office
Table 4.3-2 Nuclear Duty Officer

NOTE:

The Emergency Restoration of Power (ERP) Director is a position that coordinates with the Corporate Emergency Response Organization. The ERP Director works with the Nuclear Duty Officer when the CEOF is activated and the Manpower/Logistics Director (EOF) when the EOF is activated. This organizational relationship is depicted on the Organization charts by a dotted line. For a description of the general responsibilities of the ERF Director as they pertain to the GSEP, refer to the following referenced Table:

Table 4.3-11 ERP Director

4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control , there are several factors differentiating the CEOF and EOF Organizations:

1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.

2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.

3) The CEOF would likely be the CECo facility utilized during daytime hours for Corporate Response to Transportation Accidents. (This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).

4) The CEOF Organization shall be activated when an Alert, a Site Emergency or a General Emergency is declared.

5) The CEOF may assume the nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies until the EOF is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEOF) and Station Director.

6) When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, after Command and Control is transferred to the EOF.

7) The CEOF should not assume ENS/HPN communications responsibilities

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3 MANAGER OF EMERGENCY OPERATIONS (CEOF)
Table 4.3-4 TECHNICAL SUPPORT MANAGER (CEOF)
Table 4.3-5 TECHNICAL SPECIALIST (CEOF)
Table 4.3-6 PROTECTIVE MEASURES DIRECTOR (CEOF)
Table 4.3-7 HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)
Table 4.3-8 ADVISORY SUPPORT MANAGER (CEOF)
Table 4.3-9 EMERGENCY PLANNER (CEOF)
Table 4.3-10 INTENTIONALLY BLANK

TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECo individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.

b. Verify that all appropriate notifications have been made.

c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.

d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.

e. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.

f. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

a. Complete all actions as listed above in part 1).

b. Notify ANI and INPO within eight (8) hours of event classification.

c. Activate the CEOF Organization.

d. When the CEOF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.

TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

a. Record NARS form information
b. Immediately notify the Nuclear Duty Officer
c. If CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

a. Activate the CEOF Organization.
b. Call affected station - verify plant status and event classification
c Initiate activation of additional Corporate Emergency Response Organizations (EOF and/or ENC Organizations) as required.
d. If an EOF is to be activated, ensure access control is initiated.
e. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.

b. Direct the overall Company response to the emergency event.

7.1.4 Corporate EOF (CEOF)

The Corporate EOF (CEOF) is the location from which the Manager of Emergency Operations (CEOF) will direct a staff in evaluating, coordinating, and directing the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of an Alert, a Site Emergency or General Emergency.

When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF is also the official backup EOF for Zion Station. The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- Technical Support personnel
- Advisory Support personnel
- Environmental Assessment personnel
- Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

January 31, 1996

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-95-274 - COMMONWEALTH EDISON COMPANY'S PROPOSAL TO USE ITS CORPORATE EMERGENCY OPERATIONS FACILITY AS AN INTERIM EMERGENCY OPERATIONS FACILITY

This is to advise you that the Commission (Chairman Jackson, exercising delegated authority pursuant to a delegation from the Commission*, in accordance with NRC Reorganization Plan No. 1 of 1980) has not objected to the staff's approval of Commonwealth Edison's plan for interim use of its corporate emergency operations facility as an interim emergency operations facility.

cc: Chairman Jackson
Commissioner Rogers
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)

Russell f/Approp Action

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE SECRETARY

January 31, 1996

Cys: Taylor
Milhoan
Thompson
Blaha
LCohen, NRR

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: John C. Hoyle, Secretary

SUBJECT: STAFF REQUIREMENTS - SECY-95-274 - COMMONWEALTH EDISON COMPANY'S PROPOSAL TO USE ITS CORPORATE EMERGENCY OPERATIONS FACILITY AS AN INTERIM EMERGENCY OPERATIONS FACILITY

This is to advise you that the Commission (Chairman Jackson, exercising delegated authority pursuant to a delegation from the Commission*, in accordance with NRC Reorganization Plan No. 1 of 1980) has not objected to the staff's approval of Commonwealth Edison's plan for interim use of its corporate emergency operations facility as an interim emergency operations facility.

cc: Chairman Jackson
Commissioner Rogers
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)

* This decision was made after consultation with Commissioner Rogers, who has not indicated an objection to this negative consent item.

SECY NOTE: THIS SRM AND SECY-95-274 WILL BE MADE PUBLICLY AVAILABLE 5 WORKING DAYS FROM THE DATE OF THIS SRM.

Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515-5701

ComEd

August 7, 1998

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Braidwood Station, Units 1 and 2
Facility Operating Licenses NPF-72 and NPF-77
NRC Docket Numbers 50-456 and 50-457

Byron Station, Units 1 and 2
Facility Operating Licenses NPF-37 and NPF-66
NRC Docket Numbers 50-454 and 50-455

Dresden Nuclear Power Station, Units 1, 2, and 3
Facility Operating Licenses DPR-2, DPR-19 and DPR-25
NRC Docket Numbers 50-10, 50-237 and 50-249

LaSalle County Station, Units 1 and 2
Facility Operating Licenses NPF-11 and NPF-18
NRC Docket Numbers 50-373 and 50-374

Quad Cities Nuclear Power Station, Units 1 and 2
Facility Operating Licenses DPR-29 and DPR-30
NRC Docket Numbers 50-254 and 50-265

Zion Nuclear Power Station, Units 1 and 2
Facility Operating Licenses DPR-39 and DPR-48
NRC Docket Numbers 50-295 and 50-304

Subject: Updated Proposal to Consolidate Near-Site Emergency Operations Facilities into a Single Central Emergency Operations Facility

References: 1) "Meeting on March 26, 1998, with Commonwealth Edison Company on Central Emergency Operations Facility," United States Nuclear Regulatory Commission meeting notes, dated May 29, 1998.

2) "Commonwealth Edison Submittal: Proposal to Consolidate Near Site Emergency Operations Facilities (EOFs) into a Single Central EOF," ComEd letter, John C. Brons to United States Nuclear Regulatory Commission, dated January 5, 1995.
3) "Commonwealth Edison Response to: USNRC Request for Additional Information regarding the Central Emergency Operations Facility," ComEd letter, John C. Brons to United States Nuclear Regulatory Commission, dated July 11,1996.
4) "Commonwealth Edison Response to: USNRC Request for Additional Information dated 12/17/96 regarding the Central Emergency Operations Facility," ComEd letter, John C. Brons to United States Nuclear Regulatory Commission, dated February 27,1997.
5) "Summary of Interim Emergency Operations Facility Response Drills through May 31, 1998," ComEd letter, R.M. Krich to United States Nuclear Regulatory Commission, dated July 16, 1998.

On March 26, 1998, Commonwealth Edison (ComEd) Company met with the Nuclear Regulatory Commission (NRC) to discuss the proposed consolidation of the Emergency Operations Facilities (EOFs) into a single Central EOF (CEOF). As requested, ComEd is submitting this letter to document the completion of ComEd's action items from the meeting as described in reference 1.

The management of the ComEd Nuclear Generation Group agrees with the advantages of a CEOF and continues to support the pursuit of NRC approval of this proposal to consolidate the near-site EOFs into a CEOF.

ComEd has reviewed the earlier request for a central EOF made by Duke Power Company and the subsequent response by the NRC to determine what, if any, effect there is on ComEd's request. Attachment A contains the results of ComEd's review, which concludes that the reasons the Duke Power Company proposal was denied will not impact ComEd's proposal.

ComEd has compared the capabilities of the near site EOFs to the CEOF. The review concluded that the capabilities provided in the CEOF are equivalent or better than those in the near-site EOFs. The comparison is provided in Attachment B.

ComEd commits to staffing the CEOF within 60 minutes of the declaration of an "Alert" or higher emergency classification. This commitment will be docketed in a

Generating Station Emergency Plan (GSEP) revision, which will also include revisions to implement the use of a CEOF. This GSEP revision will be submitted within 6 months following NRC approval of ComEd's use of a CEOF in lieu of the near-site EOFs.

ComEd has reviewed its previous submittals on the CEOF. Attachments C through G identify changes from previous submittals. Specific items that have been addressed in these attachments include: (1) the impact of ComEd's decision to cease operation of the Zion Nuclear Power Station; (2) changes made to the communications systems (both computer and voice communications); (3) availability of backup power; and (4) the results of the special drills that have been conducted.

ComEd conducted a real-time drive-in staffing drill for the CEOF on May 14, 1998. The results of this drill were submitted to the NRC in reference 5. Another real-time drive-in drill was conducted on August 4, 1998; the results of that drill will be documented in a separate submittal. ComEd plans to conduct another real-time drive-in drill later in 1998.

ComEd commits to conduct unannounced, real-time off-hour drive-in drills every 6 months, until three successive drills have been successfully completed. Upon completion of three consecutive successful drills, ComEd will conduct these drills once every six years, consistent with the guidance in NUREG-0654. The results of these drills will be provided to the NRC in a letter following the completion of each drill. The letter will include the results of the drive-in drill, as well as the results of the augmentation phone drills in the preceding time period and ComEd's actions to address any deficiencies.

ComEd's assessment of the potential impact on NRC emergency response capability as a result of implementing the CEOF is contained in Attachment H. ComEd concludes that the change to a CEOF will result in an overall improvement of NRC response capability.

If you have any questions or concerns, please contact K. A. Ainger at (630) 663-7350.

Respectfully,

K. A. Ainger for

R. M. Krich
Vice President - Regulatory Services

Attachments:

A) Comparative Review of ComEd's Request for a Central Emergency Operations Facility to Duke Power Company
B) Comparison of Capabilities Between the Near-Site EOFs and the Corporate Emergency Operations Facility
C) Updated Cost Analysis
D) Summary of Changes in the Communications Technology Area
E) Back-up Power Supply Provisions to the Central Emergency Operations Facility
F) Results and Corrective Actions Taken in Response to Corporate Emergency Operations Facility Staffing Drills
G) Summary of Changes from Previous Submittals
H) Potential Impact on Nuclear Regulatory Commission Emergency Response Due to Central Emergency Operations Facility

cc: NRC Regional Administrator, Region III
NRC Senior Resident Inspector, Braidwood Station
NRC Senior Resident Inspector, Byron Station
NRC Senior Resident Inspector, Dresden Nuclear Power Station
NRC Senior Resident Inspector, LaSalle County Station
NRC Senior Resident Inspector, Quad Cities Nuclear Power Station

bcc: Illinois Department of Nuclear Safety
Illinois Emergency Management Agency
Iowa Emergency Management Division
Wisconsin Emergency Management
S. Richards, Project Director, Project Directorate III-2, NRC/NRR
G. Dick, Senior Project Manager, Project Directorate III-2, NRC/NRR
M. Vonk, Emergency Preparedness Director
L. Holden, Nuclear Licensing Administrator

ATTACHMENT A

Comparative Review of ComEd's Request for a Central Emergency Operations Facility to Duke Power Company

During the meeting on March 26, 1998, the NRC requested ComEd to review the request for a central EOF made by Duke Power Company, and the subsequent response by the NRC to determine what, if any, affect there is on ComEd's request.

In Duke Power Company's case, the NRC believed that accident management from a distant Emergency Operations Facility (EOF) would not be able to provide adequate response for the following reasons:

- the EOF staff would not be able to interact directly with their Federal, State, and local counterparts
- the utility emergency response manager would not be in face-to-face communication with the NRC Director of Site Operations (DSO)
- the utility emergency manager would not be able to go directly to the plant or State Forward Command Post.

For ComEd, the use of a Central EOF (CEOF) provides the optimum response in that it:

- can be staffed within 60 minutes with qualified individuals,
- reduces the impact on nuclear station resources,
- has no detrimental effect on State or local agency response activities,
- does not reduce the effectiveness of the EOF response functions.

ComEd differs from Duke Power Company in the following ways:

- Direct face-to-face interactions with State and local counterparts at the EOF have never been a part of ComEd's emergency response. State and county decision-makers have not and do not respond to an EOF. The State agencies only send individuals to perform liaison functions. The local agencies do not send any one to the EOF.
- ComEd's emergency response philosophy does not include sending a utility manager from the EOF to the site. Plant managers, trained and qualified as Technical Support Center Directors, direct on-site activities.
- ComEd emergency response philosophy has not and would not relocate the utility emergency response director (Manager of Emergency Operations) to the State Forward Command Post. ComEd does not send anyone to the State Forward Command Post. ComEd does send a utility liaison to the State Emergency Operations Center.
- In contrast to States impacted by Duke Power Company facilities, the States impacted by ComEd direct their activities from facilities located far from any of the sites. Illinois, Iowa, and Wisconsin, respectively, direct their responses from their Emergency Operations Centers in Springfield, Des Moines, and Madison. These cities are in excess of 100 miles from the nearest ComEd EOF. All communications are

conducted via voice and data links and would remain so following adoption of the CEOF.

- In addition, the Federal Radiological Emergency Response Plan (FREP) has undergone significant changes since the Duke Power Company decision. Federal response will be coordinated through the Federal Radiological Management and Assessment Center (FRMAC) and the Joint Operations Center (JOC). Since space is not adequate, nor is it required to be, to support co-location of these facilities at the near-site EOFs, the EOF staff would not be able to interact directly with their federal counterparts. Communications would be conducted via voice and data links.

ComEd's emergency response philosophy described above has been successfully demonstrated over many years in numerous exercises.

ComEd previously provided a detailed comparison to Duke Power Company in response to Question 10 of the first RAI (reference 3).

In conclusion, the reasons the 1984 Duke Power Company proposal was denied will not impact ComEd's proposed CEOF concept. The longstanding emergency response philosophy of ComEd has proven effective and is in concert with affected State and local agency responses, all of which will be carried over into the proposed CEOF concept.

ATTACHMENT B

Comparison of Capabilities Between the Near-Site Emergency Operations Facilities and the Corporate Emergency Operations Facility

The layout of the Corporate EOF is physically different than the near-site EOFs. The primary difference is that the Corporate EOF is compartmentalized by discipline or function while the near-site EOFs contain an open work area for the entire support staff. In the Corporate EOF, there is an Executive Management Center (EMC), an Advisory Support Room, a Protective Measures Room, a Technical Support Room, and a Public Information Room. In addition, two meeting rooms adjacent to the Corporate EOF have been provided with telephone lines. One of these meeting rooms is designated for use by NRC and Federal responders. The other meeting room is designated for use by State responders. There is more square footage provided in the Corporate EOF than in a near-site EOF.

Personnel responding to the Corporate EOF are qualified the same, perform the same functions, and use the same procedures as those who would respond to a near site EOF. The equipment and resources available at the Corporate EOF are equivalent or better than those available at a near-site EOF.

Federal Telecommunication System (FTS) circuits have been installed by the NRC at the existing near-site EOFs. Presently, there are no FTS circuits at the Corporate EOF. ComEd will coordinate installation of the FTS circuits with the NRC.

Following installation of the FTS circuits, or equivalent, there will be no functional difference between the existing near-site EOFs and the Corporate EOF.

NRC evaluation of the Corporate EOF in recent exercises and demonstrations as a back-up EOF have concluded that the proposed CEOF would function in an acceptable manner.

ATTACHMENT C

Updated Cost Analysis

The updated cost analysis takes into consideration the following:

- the potential impact on savings based on the future closure of the Zion near-site EOF because of the station's permanently shutdown status,
- changes made to communication systems (voice and data) since the original submittal, and
- the person-hour savings which would result from the ability to reduce the number of individuals that would need to be trained annually if ComEd were able to form response teams for the full EOF staffing (not just for the reduced Corporate EOF staff).

The results of the cost benefit analysis for ComEd's ability to utilize a single Central EOF in lieu of the near site EOFs indicates an estimated one-time saving (or re-deployment of ComEd assets) of $108,500 and an estimated annual pre-tax savings of $359,168.* If Zion is excluded from these values, the one-time saving would be $78,000 and the annual savings would be $342,817.* The table entitled "Central EOF: Cost Analysis," at the end of this Attachment, provides the values used for each facility.

Future savings will be achieved when desired or necessary upgrades of the near site EOFs or their equipment are made. Upgrades such as the change out of computer systems or technological obsolescence of equipment are often necessary and are dictated by changes made to equipment at the stations. In these cases, ComEd will save approximately 80% of the costs of such equipment changes. As an example, equipment changes that presently cost $100,000 to make will be reduced to $20,000. In addition, changes can be made in a shorter period. This will reduce the time in which response capabilities may be degraded by such modifications. Labor cost to manage and complete future upgrades will also be reduced by a similar portion. Examples of such potential future savings include:

- The Nuclear Accident Reporting System (NARS) is aging and will need to be replaced in the next decade. While the replacement system has not been designed, clearly four fewer locations would be less costly. Based on the cost to install a new NARS site with the current system, ComEd can avoid (at a minimum) $10,000 per site or $40,000.
- Personal computers and printers usually need to be replaced about every five years due to technical obsolescence. This averages out to about $10,000 per year of avoided costs if only one EOF needs to be upgraded.

---

* *Includes an estimated reduction of $120,000/year for ComEd microwave maintenance costs, $120,000/year for the fiber optic network maintenance costs, and $28,000 for an estimated 100 person-hour/year savings based on reduced training requirements once Full Staff Team response is introduced. These values are not reflected on the Table.*

ATTACHMENT C

Central EOF: Cost Analysis+

	Dixon	Mazon	Morrison	Zion [Note 6]
One-Time Saving				
Excess A/V Equipment	$20,000 (estimate)	$20,000 (estimate)	$20,000 (estimate)	$20,000 (estimate)
Excess Computer Equipment [Note 1]	$6000 (estimate)	$6000 (estimate)	$6000 (estimate)	$10,500 (estimate)
Annual Savings				
Reduced Communications Surveillance (person-day x $250) [Note 2]	$2125/year (8.5 person-day/year)	$2125/year (8.5 person-day/year)	$2125/year (8.5 person-day/year)	$2125/year (8.5 person-day/year)
Clerical Time [Note 3]	$5550/year	$3120/year	$3120/year	$1170/year
Telephone Service [Note 4]	$7944/year ($662/mo.)	$23,112/year ($1926/mo.)	$13,884/year ($1157/mo.)	$8,448/year ($704/mo.) [Note 5]
NARS [Note 5]	$2,724/year ($227/mo.)	$1,392/year ($116/mo.)	$1,740/year ($145/mo.)	$1,392/year ($116/mo.)
State hotlines [Note 5]			$5,856/year ($488/mo.)	$3,216/year ($268/mo.)

Notes:

1. Computer equipment estimate is based on $1500 per workstation.
2. Based on $50,000 annual salary with $15,000 burden.
3. Based on estimated $15/hour pay (includes burden). Time estimates provided by stations in 1994 (Braidwood estimate not available).
4. Based on actual monthly telephone bills of the EOF less actual monthly telephone bill of Highland Park JPIC.
5. Based on actual monthly telephone bills.
6. Based on the permanently shutdown and defueled status of Zion Station, the Zion EOF will likely be deleted from the GSEP in 1999.

\+ *Values represent pre-tax estimated current values and are rounded to the nearest whole dollar.*

ATTACHMENT D

Summary of Changes in the Communications Technology Area

Over time, ComEd has changed the voice and data communications between the Stations and the EOFs to more current technology. For instance, when the EOFs were first built, remote terminals connected to the stations' process computers were common. Since that time, ComEd installed a mini-computer at each EOF with several terminals. This allowed for several users to see and monitor the plant data at the EOF. Recently, ComEd installed a Local Area Network (LAN) with personal computers (PCs) at all of the EOFs, including the Corporate EOF. Another example of changing technology is data communications between the EOF and the station. The remote terminals installed in the EOFs when they were first built were connected to the station process computer via 300 bits per second data lines, one modem for each terminal. The mini-computer in the EOF was connected to the station via four 9600 bits per second modems. Currently, the EOFs, including the Corporate EOF, are connected using 1.54 million bits per second data lines carried on ComEd owned fiber optic lines. As technology changes, so must the data and voice communications. Each of these changes made an EOF more usable and reliable.

The communication and data systems that are provided in the Corporate EOF are equal or better than those provided in the near site EOFs. Voice communications are provided over a diverse and extensive communication network including commercial lines carried by local telephone company serving offices, station extensions carried by the ComEd-owned fiber optic network, and station extensions and local lines from unaffected communities carried by the ComEd-owned microwave system.

Data communications are provided via ComEd's Wide Area Network (WAN) and Local Area Network (LAN) systems. Data is transmitted from each of the sites' process computers to the WAN, where it can be accessed by numerous terminals located throughout the Corporate EOF. The plant parameter data available to the site is therefore available to the Corporate EOF, just as it is available to the near site EOFs. Data is communicated over a ComEd-owned fiber optic network, which is designed as a counter rotating double ring, which means that a single break in the fiber optic network will not interrupt data communications. The data acquisition speed at the Corporate EOF is much higher than at the near-site EOFs because the data circuit is shared with the rest of the ComEd network at Downers Grove.

ATTACHMENT E

Back-up Power Supply Provisions to the Central Emergency Operations Facility

The Corporate EOF is located in Executive Towers III (ETW III) in Downers Grove, Illinois. There are two 12KV feeds to the building. These feeds are switched through a manual switch. Feed W4521 is the normal feed and is supplied from Transmission Sub-Station (TSS) 145 (York Center). Feed W578 is the secondary feed and is supplied from Transmission Distribution Center (TDC) 557 (Butterfield). The York Center TSS is powered from 138KV lines 10301 and 10302. The configuration of the TSS is such that the 12KV bus that supplies feeder W4521 has two feeds – one from line 10301 and one from line 10302. Loss of either line should not result in an interruption to the 12KV bus that supplies feeder W4521. The Butterfield TDC is powered from 138KV lines 10301 and 10302. The configuration of the TSS is such that the 12KV bus that supplies feeder W578 is normally fed from line 10302. Loss of line 10302 will result in a momentary interruption (10 seconds) to the bus that supplies feeder W578 until a 12KV bus tie autocloses to restore the bus.

In addition, the switching at ETW III has been modified to allow connection of a portable diesel generator with step-up transformer.

The Corporate EOF has DC lighting and uninterruptible power supplies (UPS) for critical equipment to sustain operation should manual switching operations be necessary. Equipment on UPSs include the dose assessment computer, field team radio, and special phone circuits. Phones supplied off of the normal ComEd phone systems (microwave, fiber optic communication network, or Private Branch Exchange (PBX)) are provided with their own back-up power supplies. The PBX has approximately a 6-hour battery backup supply. Both the ComEd microwave and fiber optic systems have approximately 12-hour battery backup supplies. There are also phones that bypass the building PBX. The Ameritech phone network powers these phones.

ATTACHMENT F

Results and Corrective Actions Taken in Response to Corporate Emergency Operations Facility Staffing Drills

Reference 1: "Commonwealth Edison Response to: USNRC Request for Additional Information dated 12/17/96 regarding the Central Emergency Operations Facility," ComEd letter, John C. Brons to United States Nuclear Regulatory Commission, dated February 27,1997.

ComEd had previously installed an automated call out system to notify and activate the Corporate Emergency Response Organization, called the Voice Response Unit (VRU). While this system worked adequately, in July of 1997, ComEd decided, for economic reasons, to contract the call-out process with Community Alert Network (CAN). When activated, the CAN system sequentially calls personnel, either at work during working hours or at home during off-hours. Calls are prioritized by distance from the facility being activated. See Attachment G for more discussion on the CAN system.

Initial implementation of the CAN system was successful, but monthly drills during the summer of 1997 resulted in several drills indicating a staffing time slightly in excess of 60 minutes for the Interim EOF staff. This staffing delay was not associated with the call-out system but rather was generally due to a lack of qualified health physics personnel filling the role of Protective Measures Director. Additional qualified personnel were identified and trained to fill this position.

Late in 1997, communication problems were noted between the Bulk Power Operations (now known as Electrical Operations [EO]) dispatcher (the designated ComEd position for initiating the call-out process) and the CAN staff which led to incorrect facilities being activated. Since the EO dispatcher could activate any of the ComEd off-site nuclear emergency response facilities, the dispatcher had to interpret which Emergency Response Organization (ERO) and facility was to be activated from the Nuclear Accident Reporting System notification, and then verbally communicate this information to the CAN staff. Both of these communications permitted possible interpretation errors. This resulted in two drills where confusion existed as to whether the near-site EOF was to be activated or the Corporate EOF was to be activated. The activation form was modified in an attempt to clarify which ERO and facility were to be activated. Additional training was provided to involved ComEd and CAN personnel. However, when the EO dispatcher simulated activation of the Byron near-site EOF instead of the Corporate EOF during the February 1998 drill, this indicated that the problem had not been corrected. Subsequent to the February 1998 drill, the EO dispatcher was limited to activating only the Interim EOF staff

that responds to the Corporate EOF. The Nuclear Duty Officer through use of a separate password, is still authorized to activate any other required facility, thereby maintaining the previous flexibility in facility activation. There have been no similar problems involving facility activation in the 15 drills conducted since this change was implemented.

Following the February 1998 drill, the conduct of drills was accelerated to a weekly frequency in an effort to verify the effectiveness of corrective actions and to provide more experience to the individuals involved in the call-out process. Seven CAN drills were conducted at this weekly interval following the change. Four of these phone drills resulted in an estimated facility staffing of less than 50 minutes. The other three resulted in staffing times ranging from 67 to 84 minutes. In all cases, the results were due to the inability to staff a single position. The unfilled position varied with each drill. No specific corrective action could be identified that would remedy the problem. In order to further improve staffing time and response effectiveness, ComEd recently revised its Interim EOF staffing response strategy to that of a dedicated response team. A description of the change is provided in Attachment G.

Weekly off-hours drills are being continued to validate the new activation system. Four phone drills were conducted between April 13, and May 14, 1998. These drills were conducted on weekday evenings between 1800 and 2100. Three of these drills resulted in Interim EOF staffing times of 50 minutes or less. The results of the fourth drill were indeterminate because a discrepancy was identified between the recorded time of the responders voice message and the time he claimed he left the message. The drill was indeterminate because that individual's response time was indeterminate. The possibility of this recurring will be reviewed in future drills, but to date this has been the only occurrence.

In accordance with ComEd's commitment to conduct actual staffing (drive-in) drills at semi-annual intervals until three successful drills are demonstrated, this new activation system was used to conduct an Interim EOF staffing drill on May 14, 1998 at 1900. Successful staffing was attained in 40 minutes from the classification time. Further details of the results of this drill and the previous 6-months of phone drills are contained in reference 1.

In 1997 and 1998, ComEd conducted multi-station drills based on postulated summer grid reliability events. The results of these drills indicated the capability of the facility to coordinate and control activities for multiple site events.

ATTACHMENT G

Summary of Changes from Previous Submittals

Augmentation Call-Out System Changes

In July of 1997, ComEd decided, for economic reasons, to contract the call-out process with the Community Alert Network (CAN) call-out system in place of the previously installed Voice Response Unit (VRU). When activated, the CAN system sequentially calls personnel, either at work during working hours or at home during off-hours. Calls are prioritized by distance from the facility being activated.

CAN has the capability to handle 100 calls/minute using up to 200 phone lines. CAN functions from two locations (Reno, Nevada and Albany, New York). CAN has long distance service from more than one long distance carrier at both of their locations. In addition, CAN has back-up power generation capacity at both locations which can provide for all of the power needs for the CAN office. The database of responders' names and telephone numbers and the call out program is located at both locations.

ComEd's Emergency Team Response Strategy

On April 13, 1998, ComEd implemented a dedicated response team approach to staff the Corporate EOF. To align with the Nuclear Generation Group (NGG) expectations of accountability and improved performance, the decision was made to implement a team response concept for the Interim EOF. Having dedicated teams on call allows for specific accountability for emergency response. It also provides for improved performance since teams train, drill and exercise as units. Minimum Staff team members are selected based on living within 60 minutes of the Corporate EOF.

Personnel are assigned to one of four rotating teams. One-week duty periods extending from Monday 0800 to Monday 0800 are assigned to each team. All team personnel are assigned pagers. Team members who are on duty are expected to meet Fitness-for-Duty and proximity requirements (Minimum Staff positions are required to remain within 60 minutes of the CEOF). If a duty Team member needs to be outside the 60 minutes response expectation, they must identify a qualified individual to assume their duty responsibilities. In addition to the duty team, a back-up team is identified in the rotation. Both teams, duty and back-up, are required to respond to the Corporate EOF for a real activation or a drive-in drill. For phone-in drill purposes, both teams are to call-in with an estimated response time to the Corporate EOF. The above would apply to CEOF activation as well. Specific teams have been assigned to participate in each exercise.

The Electric Operation (EO) dispatcher, as was done in the previous activation methods, initiates activation of the team response. When the EO dispatcher

receives notification of an emergency classification of Alert or higher, he activates the pager system, rather than a phone call-out system. Response team personnel are responsible for correctly responding to the page. The Nuclear Duty Officer (NDO) also receives the page. In addition, by procedure, the EO dispatcher notifies the NDO. This ensures that the NDO is aware of the event and that the proper facility was activated. In order to provide additional confidence that the facility is activated, the NDO can activate the pager system independent of the EO dispatcher.

ComEd has provided an additional back-up capability should the pager system fail. The NDO and two Emergency Preparedness Department (EPD) personnel (not assigned to the response team on duty) maintain current telephone directories for all qualified Emergency Responders. If necessary, the NDO pages the two EPD personnel (using a different pager system, operated by a separate company from the team responder pager system) or calls them by phone, and instructs them to initiate staffing by calling emergency responders using the phone directory. The phone directory is prioritized by off-hours proximity to the Corporate EOF and each of the near-site EOFs.

ComEd still uses the CAN system to staff the near-site EOFs or to augment the Interim EOF staff at the Corporate EOF to a full EOF staff. The NDO is responsible for activating the CAN system.

ComEd would use the same team concept for staffing the Central EOF.

State Forward Command Posts

The following State Forward Command Posts (SFCPs) have been relocated:

Station	SFCP Location	Distance to Site (miles)
Quad Cities	Morrison, IL	20
Zion	Lake County Community Coordination Center (CCC) Libertyville, IL	15
Byron	Rochelle IDNS Office Rochelle, IL	19

Corporate Emergency Operations Facility

The floor plan essentially remains unchanged from previous submittals with the exception that the square footage of the State responder area has been reduced from 870 square feet to 400 square feet. This is because Room 512 has been designated as a computer lab and is no longer considered to be part of the Corporate EOF.

ATTACHMENT H

Potential Impact on Nuclear Regulatory Commission Emergency Response Due to Central Emergency Operations Facility

The change to a Central EOF (CEOF) for ComEd will result in an overall improvement of incident response capability for the NRC based on an improvement in response time for the Director of Site Operations and his key support staff. The response time to the CEOF, for the majority of the NRC team members, including the Director of Site Operations, will be reduced. The response time for the team members going directly to the site or the Press Information Center will remain unchanged.

As previously discussed with the NRC, ComEd will maintain near-site facilities for NRC response. The proposed facilities would be co-located with the Joint Public Information Centers. ComEd personnel will be available to interface with the NRC near-site response team.

AUG 10 1992

Docket Nos. 50-237;
50-249; 50-254; 50-265;
50-295; 50-304; 50-373;
50-374; 50-454; 50-455;
50-456; 50-457

Commonwealth Edison Company
ATTN: Mr. Cordell Reed
Senior Vice President
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Reed:

This refers to the inspection conducted by Mr. T. Ploski and others of this office on July 27-29, 1992. The inspection included a review of authorized activities for your corporate emergency preparedness department. At the conclusion of the inspection, the findings were discussed with those members of your staff identified in the enclosed report.

Areas examined during the inspection are identified in the enclosed report. Within these areas, the inspection consisted of a selective examination of procedures and representative records, observations, and interviews with personnel.

During this inspection, certain of your activities appeared to be in violation of NRC requirements. However, as described in the enclosed inspection report, you identified the violation. Therefore, the violation will not be subject to enforcement action because your efforts in identifying and correcting the violation meet the criteria specified in Section VII.B of the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy, 10 CFR Part 2, Appendix C (1992)).

In addition, we have identified a significant issue concerning your ability to activate your Emergency Operation Facilities (EOF) in a timely manner. Your most recent augmentation drills indicate that minimum staffing would take at least two to three hours after your staff members were notified and complete staff augmentation would take as long as four hours. NRC regulations require timely augmentation of response capabilities. NUREG-0737, Supplement 1, specifies that facilities shall have as a goal emergency activation times for their EOF within the guidelines of Table 2 of the NUREG. The NRC's position is that an EOF should be staffed in about one hour after the decision to activate the facility is made. Supplement 1 to the NUREG also states that "reasonable exceptions" to this goal "should be justified and will be considered by NRC staff". The NRC is not aware of justification for staff augmentation times indicated by your recent drills. Therefore, your current emergency preparedness program does not appear to adequately meet the intent of the regulations pertaining to timeliness. We request a written response

9209
CRB

Attachment 6

winthin 30 days describing your actions to address this inadequacy in your emergency preparedness program.

Your response should also include a description of how the results of your corrective actions will be assessed in accordance with 10 CFR 50.47(b)(14) which requires you to conduct exercises to evaluate major portions of your emergency response capabilities.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter, the enclosed inspection report, and your response to this letter will be placed in the NRC Public Document Room.

The response directed by this letter is 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 inspection.

Sincerely,

ORIGINAL SIGNED BY CHARLES E NORELIUS

Charles E. Norelius, Director
Division of Radiation Safety
and Safeguards

Enclosure: Inspection Report
Nos. 50-237/92022(DRSS); 50-249/92022(DRSS);
50-254/92019(DRSS); 50-265/92019(DRSS);
50-295/92020(DRSS); 50-304/92020(DRSS);
50-373/92017(DRSS); 50-374/92017(DRSS);
50-454/92014(DRSS); 50-455/92014(DRSS);
50-456/92016(DRSS); 50-457/92016(DRSS)

See Attached Distribution:

RIII	RIII	RIII	RIII	RIII	NRR	RIII
Ploski/jp	Simons	Cox	Knop	Farber	Erickson	McCormick-Barger
RIII	RIII			8/18/92		
Pederson	Norelius					
08/ /92						

Distribution:

cc w/enclosure:
M. Wallace, Vice President, PWR Operations
T. Kovach, Nuclear Licensing Manager
A. Checca, Nuclear Licensing Administrator
K. Kofron, Station Manager
A. Haeger, Regulatory Assurance Supervisor
D. Galle, Vice President, BWR, Operations
C. Schroeder, Station Manager
R. Radtke, Regulatory Assurance Supervisor
G. J. Diederich, Station Manager
R. L. Bax, Station Manager
T. Joyce, Station Manager
R. Chrzanowski, Regulatory Assurance Supervisor
DCD/DCB (RIDS)
OC/LFDCB
Resident Inspectors, Byron, Braidwood, Zion, LaSalle, Dresden, Quad Cities
D. W. Cassel, Jr., Esq.
Richard Hubbard
J. W. McCaffrey, Chief, Public Utilities Division
Licensing Project Mgr., NRR
Robert Newmann, Office of Public Counsel, State of Illinois Center
State Liaison Officer
T. Schuster, Nuclear Licensing Administrator
R. Pleniewicz, Station Manager
D. Brindle, Regulatory Assurance Supervisor
Diane Chavez, DAARE/SAFE
Robert M. Thompson, Administrator Wisconsin Division of Emergency Government
Patricia O'Brien, Governor's Office of Consumer Services
Mayor, City of Zion
Chandu Patel, LPM, NRR
I. Johnson, CECo, Emergency Preparedness Director
D. Bement, FEMA, RV
R. Bissell, FEMA, RVII

U.S. NUCLEAR REGULATORY COMMISSION

REGION III

Report Nos. 50-237/92022(DRSS); 50-249/92022(DRSS)
50-254/92019(DRSS); 50-265/92019(DRSS)
50-295/92020(DRSS); 50-304/92020(DRSS)
50-373/92017(DRSS); 50-374/92017(DRSS)
50-454/92014(DRSS); 50-455/92014(DRSS)
50-456/92016(DRSS); 50-457/92016(DRSS)

Docket Nos. 50-237; 50-249; 50-254; 50-265; 50-295; 50-304; 50-373; 50-374; 50-454; 50-455; 50-456; 50-457

License Nos. DPR-19; DPR-25; DPR-29; DPR-30; DPR-39; DPR-48; NPF-11; NPF-18; NPF-37; NPF-66; NPF-72; NPF-77

Licensee: Commonwealth Edison Company
Opus West III
1400 Opus Place
Downers Grove, IL 60515

Facility Name: Nuclear Safety and Emergency Preparedness Department

Inspection At: Chicago, Illinois

Inspection Conducted: July 27-29, 1992

Inspectors: T. Ploski — Date

H. Simons — Date

L. Cox — Date

Approved By: J. W. McCormick-Barger, Chief — Date
Emergency Preparedness and
Non-Power Reactor Section

Inspection Summary

Inspection on July 27-29, 1992 (Report Nos. 50-237/92022(DRSS); 50-249/92022(DRSS); 50-254/92019(DRSS); 50-265/92019(DRSS); 50-295/92020(DRSS); 50-304/92020(DRSS); 50-373/92017(DRSS); 50-374/92017(DRSS); 50-454/92014(DRSS); 50-455/92014(DRSS); 50-456/92016(DRSS); 50-457/92016(DRSS))
Areas Inspected: Routine, announced inspection of the activities of the licensee's corporate Emergency Preparedness (EP) staff (IP 82701) by three NRC inspectors.

Results: One non-cited violation was identified related to the corporate EP training program (Section 3.d). A significant issue was identified concerning the licensee's ability to activate their Emergency Operation Facilities (EOF) in a timely manner (Section 3.c). Recent augmentation drills indicate that minimum staffing would take at least two to three hours after staff members were notified and complete staff augmentation would take as long as four hours.

Other aspects of the emergency preparedness program which the corporate staff are responsible for remained well maintained.

DETAILS

1. Persons Contacted

a. Licensee Representatives Contacted

I. Johnson, Emergency Preparedness (EP) Director
L. Holden, EP Supervisor
T. Blackmon, EP Supervisor
M. Pavey, Emergency Planner
K. Steele, EP Instructor
D. Silcox, EP Instructor

b. Others Contacted

J. Bradley, Murray and Trettel, Inc.

The above licensee representatives attended the NRC exit interview on July 29, 1992. The inspectors also contacted other licensee personnel during the inspection.

2. Licensee Action on Inspection Followup Items (IP 82701)

(Closed) Inspection Followup Item No. 454/92004-01 and 455/92004-01: The licensee failed to revise the emergency implementing procedure pertaining to emergency action levels following a revision to the Byron Annex to the Generating Stations Emergency Plan (GSEP).

The licensee had completed the corrective actions on this violation. An administrative procedure for updating and revising the station annexes to the GSEP had been written and approved. One corporate emergency planning specialist was responsible for coordinating annex revisions. The Byron Annex was revised to be consistent with the GSEP. This item is closed.

3. Operational Status of the Emergency Preparedness (EP) Program (IP 82701)

a. Emergency Plan and Implementing Procedures

Several Corporate Emergency Plan Implementing Procedures (CEPIPs) were reviewed. All CEPIPs had been revised following the implementation of Revision 7 of the GSEP. The CEPIPs were well structured into position specific instructions for use during an emergency.

A review of 1992 CEPIP revisions indicated that, with one minor exception, they had been submitted to the NRC within 30 days of their final approvals, per the requirements of 10 CFR 50.4 and 10 CFR 50, Appendix E, Paragraph V.

No violations or deviations were identified.

b. Emergency Response Facility, Equipment and Supplies

The Zion Station's Backup Emergency Operations Facility (BEOF) was located in the licensee's downtown Chicago offices. Records review and a tour of this facility indicated that it has been maintained in an adequate state of operational readiness. The licensee planned to request NRC approval in order to change the Zion Station's BEOF to the Corporate EOF, which was constructed in 1991 at the licensee's newer corporate offices in Downers Grove, Illinois.

The public notification systems for the six stations' plume pathway Emergency Planning Zones (EPZs) were discussed with cognizant staff and appeared to be adequate. Outdoor sirens were the principal means of alerting the public within the EPZs while route alerting by local officials would be utilized for rural portions of some EPZs.

A contractor had performed semi-annual preventive maintenance and emergency maintenance on the outdoor siren system, including the equipment which the local officials used to activate the system.

The contractor had begun installing telemetry equipment on most of the 396 sirens in the six stations' EPZs as another means to better assure siren system operability. The telemetry installation project was scheduled for completion by 1993. The licensee indicated that its contractor would perform daily telemetry checks on each siren.

The licensee recently developed reference documents for each EPZ's siren system. These documents contained basic information on each siren, including maps illustrating each siren's zone of coverage. Controlled copies of these reference documents were provided to local officials for use in their Emergency Operations Centers.

No violations or deviations were identified.

c. Organization and Management Control

The Corporate EP Director and her staff reported to the Senior Vice President - Nuclear Operations through the General Manager of the Nuclear Safety and Emergency Preparedness Department. The corporate EP staff's responsibilities were as described in Chapter 8 of the GSEP. Although there were a number of personnel changes in recent years, the corporate EP staff's size and internal organization remained largely unchanged since mid-1988.

The licensee has increased the number of its corporate staff having responsibilities for interfacing with state and local officials in a variety of matters, including the maintenance of counties' radiological emergency response plans and procedures.

and the conduct of related training. Corporate staff previously utilized contractors to a great extent on such offsite EP matters.

The licensee utilized several formal mechanisms to share information between corporate and station-based EP staff. Counterpart meetings involving corporate EP staff and the stations' EP coordinators and instructors had occurred several times per year for over four years. Since the late 1980s, corporate staff had issued several categories of "SALP 1 Lessons Learned Letters" to the stations' management and EP coordinators. As was being done in other functional areas, quarterly "Executive Summary/Window Reports" had been issued regarding each station's EP program.

Corporate staff were responsible for maintaining Letters of Agreement (LOAs) with support organizations which were common to all six nuclear stations. These LOAs were updated in 1992.

The GSEP Telephone Directory, which listed corporate and station-based personnel assigned to positions in the licensee's offsite Emergency Response Organization (ERO), was well maintained and revised quarterly. Review of the current and recent revisions of the directory indicated that the licensee maintained excellent numbers of personnel for all key and support positions in its offsite ERO.

The licensee's approved GSEP did not include a time commitment by which its personnel would be expected to staff a station's EOF or Joint Public Information Center (JPIC) following any Site Area Emergency, General Emergency declaration, or a decision to activate the facility. Since the licensee typically prepositioned its EOF and JPIC responders at local motels for annual EP exercises, the timeframes needed to adequately staff any station's EOF during normal and offhours in the event of an actual Site Area or General Emergency declaration remained uncertain.

The current Revision 7 to the GSEP included a new commitment that the licensee would conduct semi-annual, off-hours notification drills of its offsite ERO. Each drill would be based on the decision to activate one station's EOF and JPIC. Persons contacted were required to provide estimated times of arrival at their assigned response facility, rather than having to actually report to that location. Offsite ERO's notification drills had been conducted on three occasions per procedure. Records reviewed identified several concerns regarding the evaluation and conduct of these notification drills. The criteria for evaluating a drill's success or failure did not include the timeliness of adequately staffing an EOF or a JPIC. Instead, the drills' objectives were limited to the timeliness of completing the notification call tree and the ability to contact sufficient personnel to fill an EOF's "minimum staff" and "complete staff" positions.

Drill records indicated some problems with call tree implementation and some lack of documentation of estimated arrival times by persons implementing the call tree. There were apparent delays in submitting call records to corporate EP staff so that the drills could be evaluated within a reasonable timeframe and issued within the 30 days required per procedure.

Records indicated that the June 1991 notification drill for the Mazon EOF shared by the Dresden, LaSalle County and Braidwood Stations was considered acceptable by the licensee, although about 47 minutes were needed to contact persons qualified for each "minimum staff" position and five of the six persons contacted indicated that their estimated arrival times were two to three hours after being notified.

The December 1991 drill for the Byron Station's EOF was also considered to be acceptable. That drill's report indicated that the "minimum staff" would have arrived at the EOF within about two hours after being notified, while the "complete staff" would have arrived within about four hours.

The draft evaluation report for the May 1992 notification drill for the Zion Station's EOF indicated that drill was unsuccessful due to problems in implementing the call tree. The inspectors noted that four of six persons, who were qualified to fill the EOF's "minimum staff" positions, estimated their arrivals as two to three hours after being notified.

The inspectors' review of drill records indicated the need for the following: additional training on implementing the call tree; more timely submittal of complete notification drill records for evaluation; revision of the timeliness criterion for conducting a remedial drill; and reassessment of the drill's objectives. In addition, corporate EP staff should ensure that each station's onsite ERO is informed of the available time estimates for staffing their station's EOF. Further, drill records should be evaluated to determine the adequacy of the licensee's method for ensuring minimum staffing of the applicable EOF in about one hour of the appropriate emergency declaration.

The need to further review the licensee's provisions for timely staffing of its EOFs and its notification drills for offsite ERO personnel will be tracked as Inspection Follow-up Item Nos. 237/92022-01; 249/92022-01; 254/92019-01; 265/92019-01; 295/92020-01; 304/92020-01; 373/92017-01; 374/92017-01; 454/92014-01; 455/92014-01; 456/92016-01; and 457/92016-01.

No violations or deviations were identified; however, one inspection follow-up item was identified.

d. EP Training Program

The EP training program for the Corporate ERO was reviewed. Corporate EP staff is responsible for providing training to personnel assigned to the EOF, the CEOF, and the JPIC. The licensee's GSEP required an approved training matrix and current lesson plans. However, the inspectors found that the licensee was not using an approved training matrix. In addition, the licensee was not using lesson plans. Since the lesson plans had become out of date and inaccurate, the EP trainers began training ERO members using the position specific procedure.

The licensee identified this concern and had all the training modules related to EOF and JPIC training rewritten by a contractor. These new modules were well written and were excellent in scope and depth. Prior to the end of the inspection, the licensee provided the inspectors with a draft training matrix which was expected to be approved and should reflect the actual training given to ERO members.

The failure to use an approved training matrix and current lesson plan, as required by the GSEP, appears to be in violation of NRC requirements. However, the licensee identified this violation and it is not being cited because the criteria specified in Section VII.B.1 of the "General Statement of Policy and Procedures for NRC Enforcement Actions," (Enforcement Policy, 10 CFR Part 2, Appendix C (1992)), were satisfied.

Corporate staff were responsible for providing initial and periodic requalification training to station and corporate based personnel assigned to certain offsite radiological impact assessment positions in the onsite and offsite EROs. Introductory, advanced and requalification training materials were revised and reformatted earlier in 1992. Persons responsible for conducting the training had implemented effective administrative mechanisms for informing the stations' and corporate EP staffs of quarterly training sessions and identifying persons needing and successfully completing the appropriate training module.

One non-cited violation was identified.

e. Audits

Records review indicated that members of the Nuclear Quality Programs (NQP) Department conducted an audit of the corporate EP staff's activities in 1990 and 1991. Corporate EP staff were responsive to the concerns identified during these audits.

Corporate staff utilized a contractor to conduct detailed audits of the quality of licensee's interfaces with state and local support organizations. These audits included interviews with a number of offsite agencies' representatives plus records review

During 1991, such audits were conducted for the Quad Cities and Zion Stations, as was described in subsequent NRC inspection reports for these sites. The contractor's 1992 audits of offsite interface were performed for the Dresden, LaSalle County and Braidwood Stations. The 1991 and 1992 audits had very good scope and depth and satisfied the requirements of 10 CFR 50.54(t). Records review and discussions with licensee staff indicated that items identified during the contractor's 1991 audits were tracked and addressed, and that the 1992 audits' findings would be handled in the same manner. The licensee currently planned to have its contractor audit offsite interfaces for the Byron Station during 1993.

No violations or deviations were identified.

f. Meteorological Monitoring and Offsite Dose Assessment

Ongoing projects regarding the six stations' meteorological monitoring programs were discussed with an EP Supervisor and a representative of the licensee's meteorological services contractor.

The contractor was in the midst of a study to determine the affects of recent building construction at the LaSalle Station on that site's meteorological sensors. The study was scheduled for completion by October 1992. Preliminary results indicated that onsite structures were affecting some wind speed and direction measurements. After review of the study, the licensee planned to meet with NRC staff to discuss the situation and possible corrective actions.

The contractor was continuing the installation of heat lamps, whose heat energy would be directed at the wind sensors mounted on the six stations' meteorological towers. The heat lamp installation project was scheduled for completion at all six stations by the Winter of 1992.

Plans were underway to upgrade the lightning protection equipment for the Braidwood Station's meteorological monitoring system.

The licensee continued to work with representatives of the Illinois Department of Nuclear Safety (IDNS) and Illinois Power Company (IPC) to utilize MESOREM as a common offsite dose projection methodology. A committee has been formed to ensure that any model revisions would be properly coordinated, tested and documented prior to their implementation. The licensee has not yet completed all of its Nuclear Quality Programs (NQP) Department's requirements in order to implement MESOREM. The licensee may elect not to implement this methodology until it has been revised to address the changes in 10 CFR Part 20.

No violations or deviations were identified.

9. Public Information Program

A review of records and discussion with cognizant licensee staff indicated that the overall process of developing, reviewing and annually distributing copies of the emergency information brochures to residences, businesses and public use facilities within the six nuclear stations' EPZs remained adequate and largely unchanged in recent years.

Improvements in recent years' editions of the brochures included the upgrading of their maps, increasing the brochures' physical dimensions and standardizing their texts wherever possible. A total of about 350,000 copies of the six stations' brochures were printed annually for distribution during the third calendar quarter. Electric utility customer mailing lists were utilized for brochure mailings to residences and bulk deliveries were made to businesses and public use facilities.

No violations or deviations were identified.

4. Exit Interview

The inspectors conducted an exit interview on July 29, 1992, with the licensee representatives identified in Section 1. The inspectors discussed the scope and preliminary findings of the inspection. The licensee indicated that none of the matters discussed were proprietary in nature.

Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

September 17, 1993

Mr. John B. Hickman
Project Manager
Project Directorate III-2
Division of Reactor Projects
III/IV/V Office of Nuclear Reactor Regulations
U. S. NRC
Washington, D.C. 20555

Subject: Response to Request for Additional Information Related to the Proposed Generating Station Emergency Plan (GSEP) Revision Incorporating the Corporate EOF as an Interim EOF, GSEP Change Request Number 93-1

Reference:
1) Teleconference between Commonwealth Edison Company (CECo) and Nuclear Regualtory Commission (NRC) dated September 3, 1993; Clarifying Additional Information Requested.

2) Teleconference between CECo and NRC dated July 22, 1993; Re: Clarifying Information Provided in Submittal of Change Request Number 93-01 to the CECo Generic Generating Station Emergency Plan (GSEP).

3) D. Saccomando letter to Mr. John Hickman dated August 5, 1993; Re: Response to NRC request for additional information pertaining to subject submittal.

With regard to Commonwealth Edison Company's (CECo's) submittal of Generating Station's Emergency Plan Change 93-1, and subsequent communications between CECo Emergency Preparedness Staff and the NRC, CECo is providing information requested during the referenced teleconference 1.

The response times for the Corporate Emergency Operations Facility (CEOF) staff and the EOF(s) minimum staff is provided in Attachment A. The information provided is the most recent and will reflect that provided in the fourth quarter GSEP Phone Directory.

Information that may be useful when reviewing Attachment A is provided as follows:

1) Response time to CECo Emergency Response Facilities (ERFs) are based upon results obtained through a written survey which queried the EOF and CEOF responders.

2) Response to a given EOF is provided by corporate and unaffected station personnel.

3) Minimum staffing for the EOF consists of: Manager of Emergency Operations (MEO), Technical Support Manager (TSM), Emergency Planner, Protective Measures Director (PMD), Advisory Support Manager (ASM), Environmental Emergency Coordinator (EEC), Offsite Dose Calculation System (ODCS) Specialist and one other member of the technical group. Response times for the remaining unspecified position are not included in the enclosure as this position will be filled by any of the remaining technical responders. Since the callout scheme utilized by Edison includes full EOF staffing, this position is expected to be filled in a short time frame and is not the limiting factor to achieving minimum staffing.

4) CEOF responders respond only to the CEOF and are not prioritized for response to any EOF.

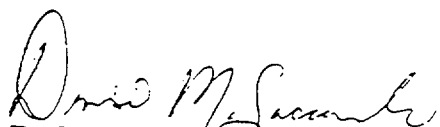
Attachment A clearly illustrates the wide geographic distribution of CECo personnel relative to its stations and emergency response facilities. Through the use of the CEOF and reprioritization of EOF responders, CECo is able to ensure that its facilities are staffed expeditiously and timely support to the TSC is provided.

Attachment B contains a summary which provides background information regarding the experience level of CEOF and EOF responders. Included in this summary is a description of their roles and responsibilities in addition to typical position characteristics. As this attachment shows, these positions are filled by seasoned individuals with significant experience in the nuclear industry. We believe that staffing the EOF and CEOF with high caliber personnel will ensure an effective offsite response without depleting critical onsite resources.

As you requested during the referenced Teleconference 2, Commonwealth Edison is enclosing documentation from the States of Illinois, Iowa and Wisconsin indicating their acceptance of CECo's proposal to use the Corporate EOF as an interim response facility until the nearsite EOF can be staffed. As indicated in Attachment C, the States concur with CECo proposed plan revision and that the information regarding coordination with the state and local governments was accurate.

Please direct any questions you or your staff may have regarding this matter to Ms. Irene Johnson at (708)663-2095 or Ms. Leslie Holden at (708)663-6673.

Very Truly Yours,



D. Saccomando
Nuclear Licensing Administrator

DS/MV/

k:rpa:gsep:nrcsub:2

DS/TW/

Attachments

cc: R. Emch - NRR
R. Pedersen - NRR
J. McCormick-Barger - NRC Region III
NRC Resident Inspector - Dresden, w/o enclosure
NRC Resident Inspector - Braidwood, w/o enclosure
NRC Resident Inspector - Byron, w/o enclosure
NRC Resident Inspector - Zion, w/o enclosure
NRC Resident Inspector - LaSalle, w/o enclosure
NRC Resident Inspector - Quad Cities, w/o enclosure
NRC Document Control Desk

k:rpa:gsep:nrcsub:3

Attachment A

EOF Prioritized Responders

MANAGER OF EMERGENCY OPERATIONS

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@PLENIEWICZ, RICHARD	Quad Cities	030 MINUTES
2	@BAX, RICHARD L.	QUAD CITIES	030 MINUTES
3	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	140 MINUTES
4	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	150 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@SCHROEDER, CHARLES	EDISON BUILDING	50 MINUTES
2	@PLENIEWICZ, RICHARD	QUAD CITIES	120 MINUTES
3	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	120 MINUTES
4	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	120 MINUTES

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@SCHROEDER, CHARLES	EDISON BUILDING	50 MINUTES
2	@PLENIEWICZ, RICHARD	QUAD CITIES	120 MINUTES
3	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	120 MINUTES
4	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	120 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@SCHROEDER, CHARLES	EDISON BUILDING	50 MINUTES
2	@PLENIEWICZ, RICHARD	QUAD CITIES	120 MINUTES
3	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	120 MINUTES
4	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	120 MINUTES

* Drive Time is from the responder's home location.

k:rpa:gsep:nrcsub:4

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@GRAESSER, KENNETH L.	Byron	150 MINUTES
2	@SCHROEDER, CHARLES	EDISON BUILDING	150 MINUTES
3	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	160 MINUTES
4	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	195 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@WARD, ROBERT C.	DOWNERS GROVE 3RD FLR	010 MINUTES
2	@GRAESSER, KENNETH L.	Byron	020 MINUTES
3	@JOYCE, THOMAS P.	DOWNERS GROVE 6TH FLR	030 MINUTES
4	@SCHROEDER, CHARLES	EDISON BUILDING	100 MINUTES

TECHNICAL SUPPORT MANAGER

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	070 MINUTES
2	@KOPACZ, JEFFREY J.	QUAD CITIES	070 MINUTES
3	@GROTH, GERALD E.	BRAIDWOOD	090 MINUTES
4	@KURTH, WILLIAM R.	ZION	160 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@SPEDL, GARY F.	DRESDEN	030 MINUTES
2	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	035 MINUTES
3	@TULON, TIMOTHY J.	BYRON	120 MINUTES
4	@KURTH, WILLIAM R.	ZION	160 MINUTES

* Drive Time is from the responder's home location.

k:rpa:gsep:nrcsub:5

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@GROTH, GERALD E.	BRAIDWOOD	020 MINUTES
2	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	035 MINUTES
3	@TULON, TIMOTHY J.	BYRON	120 MINUTES
4	@KURTH, WILLIAM R.	ZION	160 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@GROTH, GERALD E.	BRAIDWOOD	020 MINUTES
2	@SPEDL, GARY F.	DRESDEN	030 MINUTES
3	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	035 MINUTES
4	@TULON, TIMOTHY J.	BYRON	120 MINUTES

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@TULON, TIMOTHY J.	BYRON	090 MINUTES
2	@GROTH, GERALD E.	BRAIDWOOD	090 MINUTES
3	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	095 MINUTES
4	@SPEDL, GARY F.	DRESDEN	150 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@TULON, TIMOTHY J.	BYRON	120 MINUTES
2	@GROTH, GERALD E.	BRAIDWOOD	120 MINUTES
3	@HUNTINGTON, WILLIAM R.	DOWNERS GROVE 3RD FLR	140 MINUTES
4	@SPEDL, GARY F.	DRESDEN	180 MINUTES

* Drive Time is from the responder's home location.

Attachment A

EOF Prioritized Responders (Continued)

EMERGENCY PLANNER

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@HOOGHEEM, DAVID W.	QUAD CITIES	055 MINUTES
2	@KREUDER, LINDA L.	QUAD CITIES	065 MINUTES
3	@HOUSTON, JERRY A.	LASALLE	070 MINUTES
4	@SHARPER, DEAN E.	DRESDEN	120 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@SHARPER, DEAN E.	DRESDEN	015 MINUTES
2	@HOUSTON, JERRY A.	LASALLE	035 MINUTES
3	@MAYER, BARBARA J.	DRESDEN	040 MINUTES
4	@HARKER, DONALD P.	DOWNERS GROVE 3RD FLR	090 MINUTES

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@HOUSTON, JERRY A.	LASALLE	035 MINUTES
2	@HARKER, DONALD P.	DOWNERS GROVE 3RD FLR	090 MINUTES
3	@SUNDERLAND, PAUL R.	DOWNERS GROVE 3RD FLR	110 MINUTES
4	@MINEJEVS, LIGA	DOWNERS GROVE 3RD FLR	120 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@SHARPER, DEAN E.	DRESDEN	015 MINUTES
2	@MAYER, BARBARA J.	DRESDEN	040 MINUTES
3	@HARKER, DONALD P.	DOWNERS GROVE 3RD FLR	090 MINUTES
4	@SUNDERLAND, PAUL R.	DOWNERS GROVE 3RD FLR	110 MINUTES

* Drive Time is from the responder's home location.

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@MCNEILL, WILLIAM R.	BYRON	120 MINUTES
2	@SHARPER, DEAN E.	DRESDEN	120 MINUTES
3	@HOUSTON, JERRY A.	LASALLE	120 MINUTES
4	@SUNDERLAND, PAUL R.	DOWNERS GROVE 3RD FLR	140 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@MINEJEVS, LIGA	DOWNERS GROVE 3RD FLR	015 MINUTES
2	@HARKER, DONALD P.	DOWNERS GROVE 3RD FLR	030 MINUTES
3	@SUNDERLAND, PAUL R.	DOWNERS GROVE 3RD FLR	030 MINUTES
4	@SHARPER, DEAN E.	DRESDEN	090 MINUTES

PROTECTIVE MEASURES DIRECTOR/ENV. EMERG COORDINATOR

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@SOBER, SHARON D.	QUAD CITIES	025 MINUTES
2	@POWELL, GREG R.	QUAD CITIES	075 MINUTES
3	@LEWIS, ALAN D.	QUAD CITIES	080 MINUTES
4	@LEWIS, JOSEPH G.	LASALLE	090 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@HAYWORTH, MICHAEL P.	DRESDEN	010 MINUTES
2	@FRIEDMANN, MARK A.	LASALLE	015 MINUTES
3	@LEWIS, JOSEPH G.	LASALLE	030 MINUTES
4	@OSHIER, LEONARD L.	LASALLE	035 MINUTES

* Drive Time is from the responder's home location.

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@FRIEDMANN, MARK A.	LASALLE	015 MINUTES
2	@LEWIS, JOSEPH G.	LASALLE	030 MINUTES
3	@OSHIER, LEONARD L.	LASALLE	035 MINUTES
4	@GOLDEN, JOHN C.	DOWNER'S GROVE 5TH FLR	080 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@HAYWORTH, MICHAEL P.	DRESDEN	010 MINUTES
2	@GOLDEN, JOHN C.	DOWNER'S GROVE	080 MINUTES
3	@SOBER, SHARON D.	QUAD CITIES	100 MINUTES
4	@ELKMANN, PAUL J.	DOWNERS GROVE 3RD FLR	105 MINUTES

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@FRIEDMANN, MARK A.	LASALLE	120 MINUTES
2	@OSHIER, LEONARD L.	LASALLE	120 MINUTES
3	@LEWIS, JOSEPH G.	LASALLE	135 MINUTES
4	@HAYWORTH, MICHAEL P.	DRESDEN	150 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@ELKMANN, PAUL J.	DOWNERS GROVE 5RD FLR	040 MINUTES
2	@GOLDEN, JOHN C.	DOWNERS GROVE 5TH FLR	075 MINUTES
3	@SOBER, SHARON D.	QUAD CITIES	100 MINUTES
4	@OSHIER, LEONARD L.	LASALLE GENERATING STA	120 MINUTES

* Drive Time is from the responder's home location.

Attachment A

EOF Prioritized Responders (Continued)

ADVISORY SUPPORT MANAGER

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@SUES, LEE A.	DOWNERS GROVE 3RD FLR	030 MINUTES
2	@SIROVY, JOSEPH E.	QUAD CITIES	080 MINUTES
3	@CIESLA, THOMAS A.	DOWNERS GROVE 3RD FLR	090 MINUTES
4	@RAGAN, RONALD M.	LASALLE	100 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@RAGAN, RONALD M.	LASALLE	015 MINUTES
2	@MANNING, PATRICK F.	DOWNERS GROVE 4TH FLR	040 MINUTES
3	@STRAIT, MICHAEL C.	DRESDEN	045 MINUTES
4	@DAVIS, LARRY E.	PRODUCTION TRAINING CE	045 MINUTES

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@RAGAN, RONALD M.	LASALLE	015 MINUTES
2	@MANNING, PATRICK F.	DOWNERS GROVE 4TH FLR	040 MINUTES
3	@DAVIS, LARRY E.	PRODUCTION TRAINING CE	045 MINUTES
4	@CIESLA, THOMAS A.	DOWNERS GROVE 3RD FLR	045 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@MANNING, PATRICK F.	DOWNERS GROVE 4TH FLR	040 MINUTES
2	@STRAIT, MICHAEL C.	DRESDEN	045 MINUTES
3	@DAVIS, LARRY E.	PRODUCTION TRAINING CE	045 MINUTES
4	@CIESLA, THOMAS A.	DOWNERS GROVE 3RD FLR	045 MINUTES

* Drive Time is from the responder's home location.

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@SNOW, MARSEYNE	BYRON	045 MINUTES
2	@SUES, LEE A.	DOWNERS GROVE 3RD FLR	065 MINUTES
3	@CASCARANO, ROBERT N.	ZION	090 MINUTES
4	@DAVIS, LARRY E.	PRODUCTION TRAINING CE	120 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@LEMKE, ROBERT C.	DOWNERS GROVE 3RD FLR	105 MINUTES
2	@DAVIS, LARRY E.	PRODUCTION TRAINING CE	120 MINUTES
3	@SNOW, MARSEYNE	BYRON	120 MINUTES
4	@RAGAN, RONALD M.	LASALLE	120 MINUTES

ODCS SPECIALIST

Priority Notification for DIXON EOF

	Name	Work Location	Drive Time *
1	@SHAW, PRISCILLA	LASALLE	070 MINUTES
2	@KOVALL, SCOTT A.	LASALLE	075 MINUTES
3	@RAGUSE, RICK A.	DRESDEN	120 MINUTES
4	@LABURN, RICHARD S.	ZION	150 MINUTES

Priority Notification for MAZON-BRAIDWOOD

	Name	Work Location	Drive Time *
1	@RAGUSE, RICK A.	DRESDEN	035 MINUTES
2	@SHAW, PRISCILLA	LASALLE	040 MINUTES
3	@KOVALL, SCOTT A.	LASALLE	050 MINUTES
4	@ROBINSON, STEPHEN D.	BYRON	120 MINUTES

* Drive Time is from the responder's home location.

k:rpa:gsep:nrcsub:11

Attachment A

EOF Prioritized Responders (Continued)

Priority Notification for MAZON-DRESDEN

	Name	Work Location	Drive Time *
1	@SHAW, PRISCILLA	LASALLE	040 MINUTES
2	@ALESHIRE, KIMBERLY A.	BRAIDWOOD	045 MINUTES
3	@KOVALL, SCOTT A.	LASALLE	050 MINUTES
4	@ROBINSON, STEPHEN D.	BYRON	120 MINUTES

Priority Notification for MAZON-LASALLE

	Name	Work Location	Drive Time *
1	@RAGUSE, RICK A.	DRESDEN	035 MINUTES
2	@ALESHIRE, KIMBERLY A.	BRAIDWOOD	045 MINUTES
3	@ROBINSON, STEPHEN D.	BYRON	120 MINUTES
4	@LABURN, RICHARD S.	ZION	120 MINUTES

Priority Notification for MORRISON EOF

	Name	Work Location	Drive Time *
1	@VITALIS, PAUL D.	BYRON	075 MINUTES
2	@ROBINSON, STEPHEN D.	BYRON	090 MINUTES
3	@KOVALL, SCOTT A.	LASALLE	090 MINUTES
4	@SHAW, PRISCILLA	LASALLE	120 MINUTES

Priority Notification for ZION EOF

	Name	Work Location	Drive Time *
1	@KOVALL, SCOTT A.	LASALLE	120 MINUTES
2	@ALESHIRE, KIMBERLY A.	BRAIDWOOD	120 MINUTES
3	@RAGUSE, RICK A.	DRESDEN	120 MINUTES
4	@SHAW, PRISCILLA	LASALLE	150 MINUTES

* Drive Time is from the responder's home location.

Attachment A

CEOF Prioritized Responders

MANAGER OF EMERGENCY OPERATIONS

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@PLIML, GEORGE J.	DOWNERS GROVE 3RD FLR	010 MINUTES
2	@KOFRON, KURT L.	BRAIDWOOD	030 MINUTES
3	@SCOTT, DOUGLAS J.	DOWNERS GROVE 3RD FLR	045 MINUTES
4	@EENIGENBURG, ELTON D.	DOWNERS GROVE 6TH FLR	045 MINUTES

TECHNICAL SUPPORT MANAGER

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@ELIAS, DAVID	DOWNERS GROVE 3RD FLR	025 MINUTES
2	@GERNER, LAWRENCE F.	DOWNERS GROVE 6TH FLR	030 MINUTES
3	@OBRIEN, DELIS E.	OFC SR VP REED	030 MINUTES
4	@WOZNIAK, DAVID B.	ZION	040 MINUTES

TECHNICAL SPECIALIST

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@MELNICOFF, MARK A.	DOWNERS GROVE 3RD FLR	025 MINUTES
2	@WIEGAND, CHRISTOPHER	BRAIDWOOD	050 MINUTES
3	@GIESEKER, JAMES W.	LASALLE	060 MINUTES
4	@REDDEN, DANIEL R.	NUCLEAR FUEL SERVICES	060 MINUTES

EMERGENCY PLANNER

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@GROVES, ROOSEVELT	DOWNERS GROVE 3RD FLR	015 MINUTES
2	@DIPONZIO, MARY E.	DOWNERS GROVE 3RD FLR	020 MINUTES
3	@NETTLES, TAMARA D.	DOWNERS GROVE 3RD FLR	020 MINUTES
4	@SILCOX, DANIEL L.	DOWNERS GROVE 3RD FLR	030 MINUTES

* Drive Time is from the responder's home location.

k:rpa:gsep:nrcsub:13

Attachment A

CEOF Prioritized Responders (Continued)

PROTECTIVE MEASURES DIRECTOR

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@THACKER, RICKY L.	BRAIDWOOD	015 MINUTES
2	@KLOTZ, KARL F.	DOWNER'S GROVE 8TH FLR	015 MINUTES
3	@ALDRICH, LARY R.	DOWNER'S GROVE 8TH FLR	030 MINUTES
4	@BURNS, JOELLEN	DOWNERS GROVE 3RD FLR	045 MINUTES

ADVISORY SUPPORT MANAGER

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@BRUNNER, JACK D.	DOWNERS GROVE 3RD FLR	015 MINUTES
2	@BUTTERFIELD, L D.	DOWNERS GROVE 6TH FLR	020 MINUTES
3	@ABRELL, GARY A.	EDISON BUILDING	020 MINUTES
4	@ACHTERBERG, JOHN	BRAIDWOOD	030 MINUTES

HP/ENVIRONMENTAL SPECIALIST(2)

Priority Notification for CEOF

	Name	Work Location	Drive Time *
1	@BELL, STEPHEN J.	DOWNERS GROVE 8TH FLR	015 MINUTES
2	@RAO, SANTOSH S.	DOWNERS GROVE 8TH FLR	020 MINUTES
3	@WEAVER, KIT T.	DOWNERS GROVE 8TH FLR	030 MINUTES
4	@KOBACK, ROBERT	BRAIDWOOD	030 MINUTES
5	@POI, DEBORAH A.	BRAIDWOOD	050 MINUTES
6	@COLE, G D.	DOWNERS GROVE 8TH FLR	075 MINUTES

* Drive Time is from the responder's home location.

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

MANAGER OF EMERGENCY OPERATIONS (MEO)
ASSISTANT MEO

PRIMARY PURPOSE OF POSITION

The manager of emergency operations (MEO) is the designated CECo individual who has the authority, management ability, and technical knowledge to manage Commonwealth Emergency Response operations.

The Assistant Manager of Emergency Operations (AMEO) has the authority, management ability and technical knowledge to assist the MEO in the management of CECo's Emergency Response operations. The Assistant MEO reports directly to the MEO and in the event that the MEO becomes incapacitated, shall assume the responsibilities of the MEO.

POSITION CHARACTERISTICS

Strong interpersonal communication and management skills are necessary. An understanding of Regulatory and intra-company relationships will significantly contribute to success in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

- Site Vice Presidents
- Station Managers
- Station Technical Superintendents
- Nuclear Operations Managers
- Engineering & Construction Managers

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

TECHNICAL SUPPORT MANAGER (TSM)
TECHNICAL SUPPORT DIRECTOR (TSD)

ROLES & RESPONSIBILITY

The Technical Support Manager (TSM) is the designated CECo individual who has requisite authority, nuclear experience and technical expertise to manage a technical staff in support of Emergency Response operations. The Technical Support Manager shall report directly to the Manager of Emergency Operations. The Technical Support Director reports to the TSM.

The Technical Support Director (TSD) is the designated CECo individual who has the responsibility to direct a technical staff in support of Emergency Response Operations. The Technical Support Director shall report directly to the Technical Support Manager.

POSITION CHARACTERISTICS

Strong interpersonal, analytical and management skills are necessary. Well developed written and oral communication skills are also important. A strong questioning attitude will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

- Station Technical Services Superintendent
- Station Operations Manager
- Station Maintenance Superintendent
- Site Engineering & Construction Managers
- Nuclear Support Manager
- Nuclear Fuel Services Manager
- Performance Monitoring & Improvement Manager

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

PROTECTIVE MEASURES COORDINATOR (PMC)

ROLES & RESPONSIBILITY

The Protective Measures Coordinator (PMC) is responsible for ensuring that the Protective Measures Director and the Environmental Emergency Coordinator are informed of plant status changes that may directly or potentially impact the public. The PMC will serve as a support individual for the Technical Support Director and functionally support the Protective Measures Director.

POSITION CHARACTERISTICS

Strong communication, interpersonal and analytical skills are necessary. A strong questioning attitude will contribute to success in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

- Station Operations Manager
- Operating Engineer
- Site Vice President Executive Assistant
- Training Supervisor
- Regulatory Assurance Supervisor
- Onsite Quality Verification Director
- Offsite Quality Verification Director

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

DESIGN & CONSTRUCTION SUPPORT DIRECTOR

ROLES & RESPONSIBILITY

The Design and Construction Support Director (DCSD) is the designated CECo individual who has the requisite authority to interface with the Architect/Engineers (A/E), Nuclear Steam Supply System (NSSS), and construction representatives on design or system modifications required for recovery activities. The DCSD shall report to the Technical Support Director.

POSITION CHARACTERISTICS

Well developed engineering judgement. Good oral and written communication skills.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

-Mechanical/Structural Design Superintendent
-Electrical/I&C Design Superintendent
-Nuclear Construction Superintendent
-Station Support Engineering Supervisor
-Modification Design Supervisor
-Site Construction Superintendent

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

WASTE SYSTEMS DIRECTOR (WSD)

ROLES & RESPONSIBILITY

The Waste Systems Director (WSD) is the designated CECo individual who has the requisite authority, nuclear experience, and technical expertise to manage the radioactive waste aspects of the emergency operations. The WSD shall support the onsite radwaste activities by providing technical assistance in the form of manpower, equipment, supplies, and recommendations for both onsite and offsite activities. The WSD shall report to the Technical Support Director.

POSITION CHARACTERISTICS

Interpersonal skills and well developed oral communication skills are necessary. Proactive and aggressive at identifying potential radwaste processing and shipping methods.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:
-Station Radwaste Foreman
-Radwaste Coordinator

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

TECHNICAL INFORMATION COORDINATOR (TIC)
SPDS/PTHSTY SPECIALIST (SPDS)
TECHNICAL SPECIALIST (TS-CEOF)

ROLES & RESPONSIBILITYS

The Technical Information Coordinator (TIC) is responsible for obtaining plant status information and ensuring that it is properly posted and disseminated. The TIC shall serve as a support individual for the Technical Support Director.

The SPDS/PTHSTY Specialist is responsible for trending plant parameter information utilizing the Safety Parameter Display system (SPDS) Program and the Point History (PTHSTY) Program. The SPDS/PTHSTY Specialist will assist in trending critical parameters as they pertain to the accident. The SPDS/PTHSTY Specialist shall serve as a support individual for the Technical Information Coordinator.

The Technical Specialist (TS) is responsible for obtaining and disseminating plant condition and status information in the CEOF. The Technical Specialist reports to the Technical Support Manager (CEOF).

POSITION CHARACTERISTICS

Good interpersonal and analytic skills. Well developed oral communication skills and questioning attitude will contribute to success in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

-Systems Engineering Supervisor
-Station Support Engineering - Group Leads
-Outage Coordinators
-Station Training - Group Leads
-MIS Supervisors
-Nuclear Fuel Services Supervisors or Senior Engineers
-PRA & Design Administrative Support Senior Engineers
-Production Training - Group Leads
-Systems Engineering Support - Senior Engineers

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

TECHNICAL COMMUNICATOR (TO TSC)
ENS COMMUNICATOR

ROLES & RESPONSIBILITY

EOF Communicators are responsible for transmitting/receiving information to/from the EOF and documenting information relayed to the EOF over the various communication systems.

POSITION CHARACTERISTICS

Well developed listening and oral communication skills are a must in this position. Good interpersonal skills and a questioning attitude are also important.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:

-Licensed Operator Training Instructors
-Simulator Training Instructors
-Station Regulatory Assurance Staff
-Regulatory Performance Staff
-Onsite Quality Verification Staff
-Offsite Quality Verification Staff

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

EOF STATUS BOARD RECORDERS
(MANUAL & ELECTRONIC)

ROLES & RESPONSIBILITY

The EOF Status Board Recorders shall report to the Technical Information Coordinator. These individuals shall post approved information and data to EOF manual and electronic status boards.

POSITION CHARACTERISTICS

Good observation and data assimilation capabilities. Ability to obtain data from various media and sources. Good interpersonal skills, and written and verbal communication skills contribute to success in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION:
-Corporate MIS staff
-Station MIS staff
-Performance Monitoring and Improvement Staff

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

PROTECTIVE MEASURES DIRECTOR (PMD) (EOF/CEOF)
ENVIRONMENTAL EMERGENCY COORDINATOR (EEC) (EOF)
HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (HP/ES) (CEOF)

ROLES & RESPONSIBILITY

The Protective Measures Director (PMD) is the designated CECo individual who is specifically qualified in the management of radiological consequence assessment and who is authorized to interact with supporting agencies. This individual will supervise the environmental assessment functions at the EOF or CEOF. The PMD shall report to the Manager of Emergency Operations.

The Environmental Emergency Coordinator (EEC) is the designated CECo individual who is specifically qualified in the coordination of radiological consequence assessment. The EEC shall report to the PMD.

The Health Physics/Environmental Specialists (HP/ES) (CEOF) reports to the PMD (CEOF). The HP/ES shall monitor onsite and offsite radiological conditions to collect and disseminate information to the CEOF staff.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communications skills are also important. Listening and questioning skills will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Station Health Physics staff
-Corporate Radiation Protection staff
-EPSP Environmental group
-Nuclear Fuel Services personnel

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

HEALTH PHYSICS DIRECTOR (HPD)

ROLES & RESPONSIBILITY

The Health Physics Director (HPD) shall support the onsite Health Physics activities under the direction of the Protective Measures Director. The HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communication skills are also important. Listening and questioning skills will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Station RP staff
-Corporate RP staff
-Nuclear Regulatory Services staff with RP background

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

STATE ENVIRONS COORDINATOR (SEC)
EOF ODCS SPECIALIST (ODCS)
EOF ENVIRONS DIRECTOR (ED)

ROLES & RESPONSIBILITY

The State Environs Coordinator, located at the EOF, is responsible for interfacing with the affected State(s) Environs Emergency Response authorities. In contact with these state personnel, the SEC communicates and exchanges environmental information and helps coordinate joint utility and state environmental response personnel activities.

The EOF ODCS Specialist is responsible for providing dose projections using the ODCS computer models. Upon activation of the EOF Organization, the EOF ODCS Specialist shall serve as a support individual for the EEC at the EOF.

The EOF Environs Director is the member of the EOF Organization who will supervise the activities of CECo Environmental Sampling teams in an emergency. The EOF ED shall serve under the EEC.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communication skills are also important. Listening and questioning skills will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.
-Station RP staff
-Corporate RP staff
-EPSP Environs Group staff
-PTD RP staff
-NFS personnel.

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

HPN COMMUNICATOR (HPN)
PROTECTIVE MEASURES COMMUNICATOR (PMC)
GSEP RADIO COMMUNICATOR

ROLES & RESPONSIBILITY

EOF Communicators are responsible for transmitting/receiving information to/from the EOF and documenting information relayed at the EOF over the various communication systems.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communication skills are also important. Listening and questioning skills will contribute to success.

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

ADVISORY SUPPORT MANAGER (ASM)
ADVISORY SUPPORT DIRECTOR (ASD)

ROLES & RESPONSIBILITY

The Advisory Support Manager (ASM) is the designated CECo individual who will manage the efforts of the Advisory Support Group located at the EOF or the CEOF. This group provides support functions in organizational logistics and governmental interface. The ASM shall report directly to the Manager of Emergency Operations in the EOF or the CEOF.

The Advisory Support Director (ASD) is the designated CECo individual who will direct the efforts of the Advisory Support group located at the EOF. This group provides support functions in organizational logistics and governmental interface areas. The ASD shall report to the Advisory Support Manager.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communication skills are also important. Listening skills and questioning attitude will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

- Executive Assistants to the Site Vice Presidents
- Nuclear Oversight personnel
- Nuclear Regulatory Services personnel
- Business Services personnel

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

EMERGENCY PLANNER (EP)

ROLES & RESPONSIBILITY

The Emergency Planner (EP) in the EOF is responsible for verifying that the CECo Generating Station Emergency Plan (GSEP) is implemented properly. The EP shall serve as a support individual for the Advisory Support Manager.

The Emergency Planner (EP) in the CEOF is responsible for verifying that the CECo Generating Station Emergency Plan (GSEP) is implemented effectively and assist the CEOF staff in facility utilization. The EP (CEOF) reports to the MEO (CEOF).

POSITION CHARACTERISTICS

Interpersonal skills and well developed oral communication skills are a must in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Station Emergency Preparedness Coordinator
-Station Emergency Preparedness Trainer
-Corporate Emergency Preparedness Personnel

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

MANPOWER/LOGISTICS DIRECTOR (MLD)

ROLES & RESPONSIBILITY

The Manpower/Logistics Director is the designated CECo individual who is responsible for providing administrative, logistic, communications, and personnel support for the emergency response operations. The Manpower/Logistics Director shall report to the Advisory Support Director.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Problem solving and decision making skills are also important. Knowledge of bargaining unit/labor relations policies, purchasing procedures and company administrative procedures.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Nuclear Station Office Supervisors
-Nuclear Operations Division - Office Supervisors
-Nuclear Station Assistant Office Supervisors

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

COMMUNICATIONS DIRECTOR

ROLES & RESPONSIBILITY

The Communications Director is responsible for the procurement of required telephone and radio communications service and facilities as specified by the Manpower/Logistics Director. The communications Director shall provide for the maintenance of the communications, as required.

POSITION CHARACTERISTICS

Proactive and aggressive at identifying and correcting problems in a crisis environment.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Information Systems personnel qualified to work with microwave, radio and telephones.

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

COMPUTER SPECIALIST(S)

ROLES & RESPONSIBILITY

The Computer Specialist shall assist the EOF Organization in the operation of Computer Systems and programs available at the EOF. This individual shall be familiar with the various station specific and Company programs utilized for computerized information retrieval and transmittal. The Computer Specialist shall assist in accessing information as requested, and shall initiate system repairs as necessary.

POSITION CHARACTERISTICS

Proactive and aggressive at identifying and correcting problems in a crisis environment.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Information Systems personnel knowledgeable in GSEP programs and computer systems.

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

GOVERNMENTAL SUPPORT DIRECTOR (GSD)

ROLES & RESPONSIBILITY

The Governmental Support Director (GSD) is responsible for maintaining effective interfaces between state and local agencies and shall provide State agencies with periodic updates and allot them working space in the EOF. The GSD shall serve as a support individual under the direction of the Advisory Support Director.

POSITION CHARACTERISTICS

Interpersonal skills are a must in this position. Well developed written and oral communications skills are also important. Listening and questioning attitude will contribute to success.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Executive Assistants to the Site Vice Presidents
-Nuclear Oversight personnel
-Nuclear Regulatory Services personnel
-Business Services personnel

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

GOVERNMENTAL COMMUNICATOR(S)
CECo EOC LIAISON(S)

ROLES & RESPONSIBILITY

EOF Communicators are responsible for transmitting/receiving information to/from the EOF and documenting information relayed at the EOF over the various communication systems.

The CECo EOC Liaison(s) are responsible for assisting in the interface between Commonwealth Edison and offsite governmental officials. They shall be located at the appropriate federal/state or county Emergency Operation Center (EOC) or command post. They shall use the Governmental Support Director as their official contact at the EOF.

POSITION CHARACTERISTICS

Interpersonal skills, listening skills, and questioning attitude are a must in this positions. Well developed written and oral communication skills are also important.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Nuclear Oversight personnel
-Training Department personnel
-Nuclear Regulatory Services personnel
-Business Services personnel
-Onsite Quality Verification personnel

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

SAFEGUARDS SPECIALIST

ROLES & RESPONSIBILITY

The Safeguards Specialist is the designated CECo individual who is responsible for the interface between the Station Security Director and the Emergency Operations Facility (EOF) on events or items relating to the security of a Nuclear Station. The Safeguards Specialist shall report to the Advisory Support Director.

POSITION CHARACTERISTICS

Interpersonal skills, listening and questioning skills are a must in this position. Well developed oral communication skills are also essential.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Corporate or Station Security Administrator

Attachment B

EOF/CEOF Responders Typical Background Information (Continued)

ACCESS CONTROL COORDINATOR

ROLES & RESPONSIBILITY

The Access Control Coordinator reports to the Safeguards Specialist. The Access Control Coordinators's duties may be assumed by the Safeguards Specialist or another director until the Access Control Coordinator arrives.

POSITION CHARACTERISTICS

Interpersonal skills and well developed oral communication skills are a must in this position.

THE FOLLOWING COMPANY POSITIONS WOULD BE CONSIDERED AS TYPICAL SOURCES TO FILL THIS GSEP POSITION.

-Corporate and Station Security Administrators

Attachment C

State Acceptance Of CECo's Proposal To Use Corporate EOF As An Interim Response Facility

Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

Rick

August 6, 1993

Ms. Ellen Gordon
Iowa Emergency Management Division
Hoover State Office Building
Room A-29
Des Moines, Iowa 50319

Dear Ms. Gordon,

Commonwealth Edison has been interacting with the Nuclear Regulatory Commission on an issue involving the timeliness of Commonwealth Edison (CECo) emergency response to our near-site Emergency Operations Facilities. (i.e. the NUREG 0654 "goal" of staffing a near site EOF within one hour from declaration of Site Area Emergency.)

Given the area Commonwealth Edison covers and our desire to support the affected station with resources from the corporate organization and other unaffected stations, Edison has proposed an alternate approach to the one hour EOF staffing goal. CECo has proposed the staffing and use of our Corporate Emergency Operations Facility (CEOF) located at Downers Grove, IL as an interim response facility until the nearsite EOF can be staffed. Staffing of the CEOF will be initiated at the Alert Classification. Staffing of the EOF will continue to be initiated upon the declaration of Site Area or General Emergency.

An element of this approach which requires further clarification for the NRC involves the coordination of the states and locals with the utility at the EOF. The NRC is concerned that the response to an emergency by state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. Attached is a copy of our reply to the NRC's concern.

If this reply is compatible with state and local response plans, please sign, date and return to me. If you have any reservations about the use of the CEOF as an interim EOF while staffing of the EOF is in progress, please let us know. We do not believe the use of the interim CEOF to be a problem given state response times to the EOF. The activation of the nearsite EOF is similar in nature to the establishment of a state forward command post with the State EOC in command. If you have any concerns with this response, please provide a letter addressing your concerns. We would appreciate a response no later than September 1, 1993.

TB/h:44

If you have questions, please contact Terry Blackmon (708)663-2097 or myself (708)663-2095.

I.M. Johnson
Emergency Preparedness and
State Programs Director

IMJ/TB/ktd

Attachment

cc: T. Blackmon

TB/h:45

Question 5: Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECo proposal.

Provide documentation regarding coordination with the affected State and local governments on the time "goal" for the staffing of the CECo near-site EOFs and the use of the CEOF as an interim EOF until the near-site EOFs are staffed.

Response:

Interface for coordination of emergency response activities with State and local governments during an emergency is initiated with the first phone call from the control room. Interface with State and local authorities for purposes of decision making transfers with command and control.

In all cases, State decisionmakers operate out of Emergency Operations Centers (EOCs) located in their respective state capitals. Local decisionmakers operate out of county EOCs. No State or local decisionmakers come to the EOF.

State personnel, who eventually arrive at the EOF, act as liaisons. As liaisons, they monitor information being provided through official channels to ensure information is being provided accurately and timely. Liaisons have no authority to make decisions for the agency they represent.

In the unique case of Illinois, data are transmitted twenty four hours a day to Springfield. The Illinois Department of Nuclear Safety (IDNS) not only gathers information from the data link but also from a real time Gaseous Effluent Monitoring System and a system of Reuter-Stokes radiation monitors (which are located in a ring near the site) on a continuous basis. As a result of the Memorandum of Understanding (MOU) between IDNS and NRC, the IDNS resident engineers report to the TSC as their emergency response location. These resident engineers remain at the TSC even after the EOF is manned. The resident engineers act as liaisons to the TSC and monitor information flow for the Illinois Department of Nuclear Safety.

Wisconsin and Iowa are provided information via telephone communications. In addition, a dedicated Decisionmakers Conference Line has been provided at Zion and Quad Cities. The Decisionmakers Conference Line connects the Station Director in the TSC or the Manager of Emergency Operations in the CEOF or EOF with the Radiological Emergency Assessment Center (REAC) Commander (IDNS), and the State Radiological Coordinator (Iowa, or Wisconsin, as appropriate). This dedicated link allows for rapid consultation on protective action decisions.

None of the counties in Illinois, Iowa or Wisconsin dispatch representation to CECo's EOFs. Counties in Illinois receive initial notification from the Illinois Emergency Management Agency (IEMA). Scott and Clinton counties in Iowa are notified at the Unusual Event (UE) and Alert level by the Iowa Emergency Management Division (IEMD) and at the Site Area Emergency (SAE) and General Emergency (GE) level by CECo. Kenosha County, Wisconsin is notified by CECo at all classification levels.

Supporting information to the counties is provided by the states either by phone or by state presence in the county EOC. CECo also dispatches a representative to the counties. CECo representatives are called out with the EOF staff and have arrival times commensurate with that to an EOF and with state representatives for a given county.

In the event that a General Emergency were the initiating event, CECo recommends protective actions directly to States and Counties simultaneously. In this event, counties would most likely take protective actions before any facility (i.e. a TSC, EOF, or State EOC) were manned.

Name

August 16, 1993
Date

TB/h:47

T. Blackmon

State of Wisconsin \ Department of Military Affairs
DIVISION OF EMERGENCY GOVERNMENT

4802 SHEBOYGAN AVENUE, ROOM
PO BOX 7865
MADISON WISCONSIN 53707-7865
Telephone (608) 266-3232
Facsimile (608) 266-1569

August 19, 1993

Ms. Irene M. Johnson
Emergency Preparedness and
State Programs Director
Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

Dear Ms. Johnson:

Attached is my signed approval of that part of your proposed response to the NRC dealing with the effectiveness of the coordination between Wisconsin state and local governments in the event of a nuclear power plant (NPP) incident.

The statement appropriately identifies the communications means and protocols between the plant EOF and the State and county EOCs.

If NRC Region III requires any further information on this issue, they may call me at (608) 266-1899 or contact Garrett Nielsen at (608) 266-3115.

Sincerely,

Christine C. Bacon

Christine C. Bacon, Director
Bureau of Technological Hazards

pc: LeRoy E. Conner, Jr., Administrator
Garrett A. Nielsen, Manager, REP Program

enclosure

(893APLTR.UCW)

Question 5: Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECo proposal.

Provide documentation regarding coordination with the affected State and local governments on the time "goal" for the staffing of the CECo near-site EOFs and the use of the CEOF as an interim EOF until the near-site EOFs are staffed.

Response:

Interface for coordination of emergency response activities with State and local governments during an emergency is initiated with the first phone call from the control room. Interface with State and local authorities for purposes of decision making transfers with command and control.

In all cases, State decisionmakers operate out of Emergency Operations Centers (EOCs) located in their respective state capitals. Local decisionmakers operate out of county EOCs. No State or local decisionmakers come to the EOF.

State personnel, who eventually arrive at the EOF, act as liaisons. As liaisons, they monitor information being provided through official channels to ensure information is being provided accurately and timely. Liaisons have no authority to make decisions for the agency they represent.

In the unique case of Illinois, data are transmitted twenty four hours a day to Springfield. The Illinois Department of Nuclear Safety (IDNS) not only gathers information from the data link but also from a real time Gaseous Effluent Monitoring System and a system of Reuter-Stokes radiation monitors (which are located in a ring near the site) on a continuous basis. As a result of the Memorandum of Understanding (MOU) between IDNS and NRC, the IDNS resident engineers report to the TSC as their emergency response location. These resident engineers remain at the TSC even after the EOF is manned. The resident engineers act as liaisons to the TSC and monitor information flow for the Illinois Department of Nuclear Safety.

Wisconsin and Iowa are provided information via telephone communications. In addition, a dedicated Decisionmakers Conference Line has been provided at Zion and Quad Cities. The Decisionmakers Conference Line connects the Station Director in the TSC or the Manager of Emergency Operations in the CEOF or EOF with the Radiological Emergency Assessment Center (REAC) Commander (IDNS), and the State Radiological Coordinator (Iowa, or Wisconsin, as appropriate). This dedicated link allows for rapid consultation on protective action decisions.

None of the counties in Illinois, Iowa or Wisconsin dispatch representation to CECo's EOFs. Counties in Illinois receive initial notification from the Illinois Emergency Management Agency (IEMA). Scott and Clinton counties in Iowa are notified at the Unusual Event (UE) and Alert level by the Iowa Emergency Management Division (IEMD) and at the Site Area Emergency (SAE) and General Emergency (GE) level by CECo. Kenosha County, Wisconsin is notified by CECo at all classification levels.

Supporting information to the counties is provided by the states either by phone or by state presence in the county EOC. CECo also dispatches a representative to the counties. CECo representatives are called out with the EOF staff and have arrival times commensurate with that to an EOF and with state representatives for a given county.

In the event that a General Emergency were the initiating event, CECo recommends protective actions directly to States and Counties simultaneously. In this event, counties would most likely take protective actions before any facility (i.e. a TSC, EOF, or State EOC) were manned.

Christopher Bacon
Name

Aug 12, 1993
Date

TB/h:51

Question 5: Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECo proposal.

Provide documentation regarding coordination with the affected State and local governments on the time "goal" for the staffing of the CECo near-site EOFs and the use of the CEOF as an interim EOF until the near-site EOFs are staffed.

Response:

Interface for coordination of emergency response activities with State and local governments during an emergency is initiated with the first phone call from the control room. Interface with State and local authorities for purposes of decision making transfers with command and control.

In all cases, State decisionmakers operate out of Emergency Operations Centers (EOCs) located in their respective state capitals. Local decisionmakers operate out of county EOCs. No State or local decisionmakers ~~come~~ are assigned to the EOF.

State personnel, who eventually arrive at the EOF, act as liaisons. As liaisons, they monitor information being provided through official channels to ensure information is being provided accurately and timely. Liaisons have no authority to make decisions for the agency they represent.

In the unique case of Illinois, data are transmitted twenty four hours a day to Springfield. The Illinois Department of Nuclear Safety (IDNS) not only gathers information from the data link but also from a real time Gaseous Effluent Monitoring System and a system of Reuter-Stokes radiation monitors (which are located in a ring near the site) on a continuous basis. As a result of the Memorandum of Understanding (MOU) between IDNS and NRC, the IDNS resident engineers report to the TSC as their emergency response location. These resident engineers remain at the TSC even after the EOF is manned. The resident engineers act as liaisons to the TSC and monitor information flow for the Illinois Department of Nuclear Safety.

Wisconsin and Iowa are provided information via telephone communications. In addition, a dedicated Decisionmakers Conference Line has been provided at Zion and Quad Cities. The Decisionmakers Conference Line connects the Station Director in the TSC or the Manager of Emergency Operations in the CEOF or EOF with the Radiological Emergency Assessment Center (REAC) Commander (IDNS), and the State Radiological Coordinator (Iowa, or Wisconsin, as appropriate). This dedicated link allows for rapid consultation on protective action decisions.

None of the counties in Illinois, Iowa or Wisconsin dispatch representation to CECo's EOFs. Counties in Illinois receive initial notification from the Illinois Emergency Management Agency (IEMA). Scott and Clinton counties in Iowa are notified at the Unusual Event (UE) and Alert level by the Iowa Emergency Management Division (IEMD) and at the Site Area Emergency (SAE) and General Emergency (GE) level by CECo. Kenosha County, Wisconsin is notified by CECo at all classification levels.

Supporting information to the counties is provided by the states either by phone or by state presence in the county EOC. CECo also dispatches a representative to the counties. CECo representatives are called out with the EOF staff and have arrival times commensurate with that to an EOF and with state representatives for a given county.

In the event that a General Emergency were the initiating event, CECo recommends protective actions directly to States and Counties simultaneously. In this event, counties would most likely take protective actions before any facility (i.e. a TSC, EOF, or State EOC) were manned.

David L Smith
Name

8/30/93
Date

TB/h:55

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE SECRETARY

IN RESPONSE, PLEASE REFER TO: M830302B

March 3, 1983

ACTION

ACTION - DeYoung
Cys: Dircks
Roe
Rehm
Stello
GCunningham
Denton

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STAFF ACTIONS REGARDING LOCATION OF EMERGENCY OPERATIONS FACILITIES, 2:30 P.M., WEDNESDAY, MARCH 2, 1983, COMMISSIONERS' CONFERENCE ROOM, D.C. OFFICE (OPEN TO PUBLIC ATTENDANCE)

The Commission was briefed by staff on actions regarding the location and habitability of emergency operations facilities proposed by utilities.

A majority of the Commission expressed a continuing desire to review all exemption requests; and directed staff to refer exemption requests and proposed staff action (grant or deny) to the Commission for decision on a negative consent basis. Chairman Palladino, and Commissioners Gilinsky, Ahearne and Asselstine were in favor of this action; Commissioner Roberts dissented. He preferred that the Commission review only exemption requests of special interest.

(IE)

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
Commission Staff Offices
PDR - Advance
DCS - 016 Phillips

RECEIVED
Date 3-7-83
Time 1:30 P.M.

Attachment 8

OFFICE OF THE SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

March 3, 1983

IN RESPONSE, PLEASE REFER TO: M830302B

ACTION - DeYoung
Cys: Dircks
Roe
Rehm
Stello
GCunningham
Denton

ACTION

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STAFF ACTIONS REGARDING LOCATION OF EMERGENCY OPERATIONS FACILITIES, 2:30 P.M., WEDNESDAY, MARCH 2, 1983, COMMISSIONERS' CONFERENCE ROOM, D.C. OFFICE (OPEN TO PUBLIC ATTENDANCE)

The Commission was briefed by staff on actions regarding the location and habitability of emergency operations facilities proposed by utilities.

A majority of the Commission expressed a continuing desire to review all exemption requests; and directed staff to refer exemption requests and proposed staff action (grant or deny) to the Commission for decision on a negative consent basis. Chairman Palladino, and Commissioners Gilinsky, Ahearne and Asselstine were in favor of this action; Commissioner Roberts dissented. He preferred that the Commission review only exemption requests of special interest.

(IE)

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Ahearne
Commissioner Roberts
Commissioner Asselstine
Commission Staff Offices
PDR - Advance
DCS - 016 Phillips

Received OM, EDO
Date 3-7-83
Time 1:32 p

Attachment 5

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE SECRETARY

April 30, 1987

MEMORANDUM FOR: Victor Stello, Jr., Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-87-67 - EXCEPTION FOR THE EMERGENCY OPERATIONS FACILITY DESIGN FOR THE OCONEE NUCLEAR STATION

The Commission has no objection to the staff's proposed approval of the Duke Power Company's request for an exception to the location, radiological habitability, and backup requirements for the Oconee Emergency Operations Facility.

The Commission (with Chairman Zech and Commissioners Asselstine and Carr approving) has agreed that future requests for exceptions to EOF requirements should continue to be submitted to the Commission. Commissioner Roberts agreed with the staff's request to act on future requests.

Copies:
Chairman Zech
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal
Commissioner Carr
OGC (H Street)
GPA

Action: Russell, NRR

Cys: Taylor
Milhoan
Thompson
Blaha
EFox, NRR ✓

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE
SECRETARY

September 18, 1996

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: John C. Hoyle, Secretary KHoyle for

SUBJECT: STAFF REQUIREMENTS - SECY-96-170 - ASSESSMENT OF EXCEPTIONS GRANTED FOR LOCATIONS AND STAFFING TIMES OF EMERGENCY OPERATION FACILITIES

The Commission has approved the staff proposal to maintain existing guidance for locations and staffing times for emergency operations facilities (EOF).

The Commission also has approved the staff recommendation that it be authorized to accept or reject exceptions to the criteria for EOF and backup EOF locations which are within five miles beyond the distance contained in NUREG-0737, Supplement 1. Cases where the licensee has proposed a deviation beyond this authorization and those for centralized EOF proposals will continue to require Commission approval.

(NRR) 9600059

cc: Chairman Jackson
Commissioner Rogers
Commissioner Dicus
Commissioner Diaz
Commissioner McGaffigan
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)

SECY NOTE: THIS SRM, SECY-96-170, AND THE VOTE SHEETS OF ALL COMMISSIONERS WILL BE MADE PUBLICLY AVAILABLE 5 WORKING DAYS FROM THE DATE OF THIS SRM.

Attachment 10

POLICY ISSUE
(Notation Vote)

August 5, 1996 SECY-96-170

FOR: The Commissioners

FROM: James M. Taylor
Executive Director for Operations

SUBJECT: ASSESSMENT OF EXCEPTIONS GRANTED FOR LOCATIONS AND STAFFING TIMES OF EMERGENCY OPERATION FACILITIES

PURPOSE:

To provide to the Commission, as requested, the results of the staffs review and an assessment of whether the guidance in NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements (Requirements for Emergency Response Capability)," with respect to the location and staffing times of emergency operations facilities (EOFs) is appropriate.

SUMMARY:

In response to a staff requirements memorandum (SRM), the staff has reviewed existing guidance for location and staffing times for EOFs to determine their adequacy. As a result of that review, the staff has concluded that the guidance on the location and staffing time specified for the EOF in NUREG-0737, Supplement 1 is still generally appropriate.

BACKGROUND:

In an SRM dated April 3, 1996, which responds to SECY-96-057, "Relocation of Emergency Operations Facility for Susquehanna Steam Electric Station," the Commission noted that the staff's request contained an exception to NUREG-0737 with respect to the location of the EOF. The Commission requested the staff to review the number of sites for which exceptions on the EOF location and staffing times had been granted, as well as pending requests, and assess whether the guidance in NUREG-0737 with respect to EOFs is appropriate or should be changed.

Contact: Edwin F. Fox, Jr., NRR/PERB
415-2908

NOTE: TO BE MADE PUBLICLY AVAILABLE WHEN THE FINAL SRM IS MADE AVAILABLE

On January 21, 1981, the Commission approved two options for the location of the EOF at nuclear power plant sites, in COMJA-80-37. One option allowed for a single EOF location between 10 and 20 miles from the site with no habitability features. The second option allowed for a primary EOF located up to 10 miles from the site with habitability features and a backup EOF without habitability features located between 10 and 20 miles from the site.

In a Chilk to Dircks memorandum of September 30, 1981, responding to SECY-81-509, the Commission disapproved a recommendation that the staff approve licensee requests for exceptions to COMJA-80-37 concerning EOF location and backup criteria where the licensee had provided a heavily shielded EOF located within 10 miles or less of the plant site without a backup EOF. The Commission stated in this memorandum that the staff could accept such facilities provided each emergency plan identified an alternate location where utility and government officials can meet and have contingency arrangements for communications to the Technical Support Center (TSC).

On November 22, 1982, the Commission approved Supplement 1 to NUREG-0737, which was subsequently issued to licensees in Generic Letter (GL) 82-33 dated December 17, 1982. Table 1 in Supplement 1 to NUREG-0737 is the same table from COMJA-80-37 which describes the EOF location options.

Licensees' responses to GL 82-33 were confirmed by Order. Supplement 1 to NUREG-0737 (at 22) states that "the EOF will be... located and provided with radiological protection features as described in Table 1 (previous guidance approved by the Commission)." The attached Table 1, "Emergency Operations Facility," of Supplement 1 to NUREG-0737 describes two options for locating the EOF. Option 1 provides for an EOF that meets radiological habitability requirements and is located within 10 miles of the site and a backup EOF that has no radiological habitability features and is located between 10 and 20 miles from the site. Option 2 provides for a single EOF that has no radiological habitability features and is located "at or beyond 10 miles" from the site, with "specific approval required by the Commission if beyond 20 miles, and some provision for NRC site team closer to the site." In addition, Table 1 "strongly recommended" that a location selected under option 2 "be coordinated with offsite authorities."

Commission SRM M830302B, dated March 3, 1983, directed the staff to refer all requests for exceptions concerning location or habitability of EOFs, along with proposed staff actions, to the Commission for decision. On April 30, 1987, in response to SECY-87-67, the Commission again directed the staff to continue to submit all future requests for exceptions to EOF requirements to the Commission.

DISCUSSION:

Rationale for Retaining the EOF Guidance Criteria

The rationale for the requirement for locating an unshielded primary EOF under option 2 (or the backup EOF under option 1) of NUREG-0737, Supplement 1, between 10 to 20 miles from the nuclear power reactor site is traceable to early Commission briefings and decisions. The 10-mile lower limit was determined to be sufficiently far from the site to avoid potentially significant radiation exposures that may be associated with core-melt accidents, yet still close enough to allow the EOF to readily communicate with the site and with personnel engaged in an emergency response. The EOF is intended to facilitate face-to-face communications between the licensee, State and local governmental officials, and the NRC staff, and the briefing and debriefing of persons going to and from the site, without exposing those persons to undue radiological risks. The 20-mile upper limit was considered to be the generally maximum optimal distance within which such face-to-face communications between the licensee, State and local government officials, and the NRC staff could continue to be effective, while permitting the timely briefing and debriefing of persons going to and from the site. While these goals have been found to be generally attainable at certain sites without strict adherence to the 10-to-20 mile criterion, or conditions may have been found to exist which would support excepting a specific site from this criterion, the staff is not aware of any information that has been presented to date which would invalidate this criterion on a generic basis.

Supplement 1 to NUREG-0737 also provides guidance with respect to EOF staffing and indicates (at 23) that "the EOF will be... staffed using Table 2 (previous guidance approved by the Commission) as a goal. Reasonable exceptions to goals for the number of additional staff personnel and response time for their arrival should be justified and will be considered by the NRC staff." Table 2, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies" of Supplement 1 to NUREG-0737, provides guidance regarding the capability for staffing additions and the times for those additions. Supplement 1 to NUREG-0737 does not specifically indicate when the EOF is to be staffed or fully operational, however, NUREG-0696, "Functional Criteria for Emergency Response Facilities" (February 1981) indicates (at 19) that "Upon EOF activation, designated personnel shall report directly to the EOF to achieve full functional operation within 1 hour."[1]

---

[1] NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (November 1980) indicates (§ II.H.2, at 52) that EOFs are to be established and operated in accordance with the guidance contained in NUREG-0696, Revision 1.

The basis for the 60 minute EOF staffing goal is not set out in either NUREG-0696 or NUREG-0737, Supplement 1. However, the 60 minute goal is generally consistent with the reactor safety studies documented in NUREG-0396, "Planning Basis for the Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," which indicates in part (at 19) that "the planning basis for the time dependence of a release is expressed as a range of time values in which to implement protective action. This range of values prior to the start of a major release is of the order of one-half hour to several hours." In addition, a time of 60 minutes is generally deemed to be the minimum required time for assembling key licensee, State and local governmental officials at an EOF. While some exceptions to this staffing goal have been granted in the past, based upon site-or licensee-specific considerations, the staff is not aware of any information which would suggest that the 60-minute staffing goal should be modified on a generic basis.

Exceptions to the EOF Guidance Criteria:

Supplement 1 to NUREG-0737 (at 24) states that "exemptions from or alternative methods of implementing these requirements should be discussed with NRC staff and in some cases could require Commission approval."[2]

1. Exceptions to EOF Location Guidance

Exceptions to EOF location criteria fall generally into four categories:

1. Exceptions to the primary EOF location.
2. Exceptions to the backup EOF location, if there is a requirement for a backup EOF.
3. Exceptions for an alternate EOF or its location when the primary EOF is hardened.[3]
4. Exceptions to the near-site EOF concept in Supplement 1 to NUREG-0737. (Attachment 2, Notes B and D)

Staff records indicate that, for currently operating plants, the Commission has granted 12 exceptions from the primary EOF location criteria and 23 exceptions from the backup EOF location criteria as specified in NUREG-0737, Supplement 1. (The staff did not include exceptions granted for sites that are no longer operational or under construction, i.e., Yankee Rowe,

---

[2] The guidance contained in NUREG-0737, Supplement 1 does not constitute in itself regulatory requirements for licensees. Accordingly, the "exemptions" referred to in Supplement 1 to NUREG-0737 are not exemptions as defined in the regulations (10 CFR 50.12) but more accurately are described as "exceptions" from the guidance.

[3] Hardened EOF - Located within the 10-mile emergency planning zone with protection factors much greater than 5 and ventilation systems that will ensure a habitable facility even during a core-melt accident.

Rancho Seco, WNP3, et. al.) Attachment 2 contains a list of sites for which an exception has been granted for currently operating plants with respect to the location of either the primary EOF or the backup EOF, if applicable.

As shown in Attachment 2, many of the exceptions which have been granted pertained to deviations of distances ranging from 0 to 5 miles from the 20-mile criterion for either the primary EOFs (3 of 12 exceptions) or backup EOFs (10 of 23 exceptions). The rationale for granting the exceptions from the primary EOF location criteria was, in most cases, that the new location was sufficiently close (between slightly more than 0 to less than 5 miles) to the 10-to-20-mile outer boundary criterion. EOF locations greater than 25 miles from the site have also been accepted for some primary EOFs (8 of 12 exceptions) or backup EOFs (5 of 23 exceptions). When the EOF location was a greater distance from the site (beyond 25 miles), the accepted rationale for its location was generally either (1) the EOF and the State Emergency Operations Center could be collocated, (2) the location was more favorable to the state or local government officials, or (3) the location facilitated a common licensee EOF. The bases for granting exceptions from the backup EOF location criteria were similar to those for exceptions to the primary EOF. Additionally, some EOF locations less than 10 miles from the site were accepted for some primary EOFs (1 of 12 exceptions) or backup EOFs (3 of 23 exceptions), generally based upon the determination that it was only a 1-to-2-mile deviation from the 10-mile criterion and this distance was offset by the use of licensee facilities which were better and amenable to use by the State and local government officials. Finally, an exception from having an alternate EOF (1 of 23 exceptions) was granted generally based upon the location of the hardened EOF (7.5 miles from the site) and its accessibility by the State and local governmental officials.

In response to SECY-81-509, the Commission authorized the staff to approve an alternate location in place of a backup EOF when the licensee had built an EOF with a high degree of habitability protection within 10 miles of the plant. The exception could be granted provided (1) that each emergency plan identified an alternate location where utility and Government officials could meet to discuss plant status and appropriate public protective actions, and (2) that the emergency plan indicated that contingency arrangements had been made to provide equipment for necessary communication with the TSC in the event of an emergency. The staff has accepted seven close-in hardened EOFs which are identified in Attachment 2 (Note A). Of the 23 exceptions granted for backup EOFs, three were for alternate EOF locations as shown in Attachment 2 (Note C).

Regarding centralized EOFs with locations well beyond the distance criteria specified in NUREG-0737, Supplement 1, the Commission has considered three proposed emergency plans that contained provisions for a centralized EOF that would serve as a single EOF for a multi-site licensee, one of which was rejected. Attachment 2 identifies those sites with a centralized EOF which have been approved by the Commission. Proposals for a centralized EOF were considered as follows: First, on January 21, 1981, before issuance of NUREG-0696, the Commission approved the TVA plan to locate the EOF for its

nuclear reactor sites beyond the distance specified in the NRC guidance (COMJA-80-37). Currently, the TVA emergency plan specifies the use of a centralized EOF located approximately 100 miles from the most distant TVA nuclear plant, with accommodations near each plant for an NRC site team.

Second, the Commission rejected an exception to the guidelines for the EOF for the Oconee Nuclear Station. Duke Power Company, licensee for Oconee, proposed to use a centralized EOF 125 miles from the Oconee site. The staff recommended that the Commission reject the Oconee proposal because the principal EOF management staff could not interact directly with its Federal, State, and local counterparts located near the plant site. Additionally, the Oconee plan did not contain provisions for staffing a near-site EOF. In an opinion issued June 24, 1985, the Fourth Circuit Court of Appeals upheld the Commission's decision not to grant Duke Power Company an exception to locate the EOF for the Oconee plant 125 miles from the site, at Duke's corporate headquarters [Duke Power Co. v. USNRC, 770 F.2d 386 (4th Cir. 1985)].

Third, the Commission has recently approved Commonwealth Edison Company's (ComEd) use of its corporate EOF as an interim EOF during an emergency at any of its nuclear stations until the affected station's near-site EOF[4] can be staffed and is operational (which usually takes 2 to 4 hours). The use of an interim EOF allows the licensee to meet the 60-minute staffing goal, and the subsequent use of near-site EOFs allows the licensee to meet the location criterion specified in NUREG-0737, Supplement 1. However, inasmuch as exceptions were required for both EOF locations and staffing times, these are included in Attachments 2 and 3, respectively. The staff is currently evaluating ComEd's further proposal to utilize a centralized EOF throughout the course of an emergency and the associated elimination of its near-site EOFs, as a separate issue from this paper, as noted in SECY-95-274.

2. Exceptions to EOF Staffing Time Guidance

As listed in Attachment 3, 17 exceptions have been granted by the staff to the 60 minute EOF staffing time goal. As of the date of this paper, no applications are pending for an exception to the 60-minute EOF staffing time guideline. As shown in Attachment 3, eight of the 17 exceptions allowed the staffing time goal of 60 minutes to be exceeded by 15 minutes and three of the 17 exceptions to be exceeded by thirty minutes. The staff accepted the licensees' justification for the deviations from the 60-minute staffing time goal based upon the overall remoteness of the sites and the location of the EOFs with respect to the individual sites. In addition, a few exception were made for longer times. For Palo Verde, the staff accepted a 120-minute staffing time because of the remoteness of the site and the fact that travel time required to staff the EOF during off-hours would be more than 1 hour.

---

[4]Four near-site EOFs support the six ComEd sites. Braidwood, Dresden, and LaSalle are supported by an EOF located at Mazon, Illinois, located 32, 40, and 45 miles, respectively, from those sites. Byron, Quad Cities, and Zion each have a near-site EOF which meets NRC's location guidance.

For Waterford, the staff accepted the 120-minute staffing time during licensing primarily because of the site's location. The remaining four exceptions were ComEd sites wherein the staff supported the licensee's proposal for the use of an interim EOF which would be staffed in 60 minutes, which would allow the near-site EOFs to be staffed in 2 to 4 hours.

Adequacy of Guidance on Locations and Staffing Times for EOFs in Supplement 1 to NUREG-0737

The criteria specified in NUREG-0737, Supplement 1, with respect to the location of EOFs and backup EOFs, is similar to the guidance contained in regulatory guides: "Methods and solutions different from those set out in the guides will be acceptable if they provide a basis for the findings requisite to the issuance or continuance of a permit or license by the Commission." GL 82-33 indicates, in part (at 1), that "The enclosures to this letter are a distillation of the basic requirements...from...guidance documents.... It is our intent that the guidance documents themselves, referred to in the enclosures, are not to be used as requirements, but rather that they are to be used as sources of guidance for NRC reviewers and licensees regarding acceptable means for meeting the basic requirements." GL 82-33 also states, in part (id.) that "the staffing levels in Table 2 to the enclosure are only goals, and are not strict requirements."

The staff's assessment of requests for exceptions previously discussed indicates that the guidance on the location and staffing time specified for the EOF in Supplement 1 to NUREG-0737 is still generally appropriate. The staff's view is that this guidance provides a reasonable framework which has withstood the test of time. This view is based on the fact that the guidance, as reflected in licensees' emergency plans, has been successfully tested on numerous occasions during emergency preparedness exercises and has been demonstrated to be adequate during responses to actual events since the early 1980's. This guidance fits a majority of nuclear power plant sites; however, a consideration of site specific factors has prompted licensees on occasion to request exceptions to the established guidance. For example, thirteen EOF exceptions could have been avoided if the primary, backup, or alternate EOF outer boundary location guidance were changed from 20 to 25 miles. However, in view of the existing state of licensee emergency preparedness programs which includes established and approved EOFs for all sites, and considering that the staff does not expect a large number of EOF location exception requests in the future (only 4 in the last 5 years), it is the staff's recommendations that the guidance should not be changed.

Similarly, eight EOF staffing time exception approvals could have been avoided if the EOF staffing time were changed, for example, from 60 to 75 minutes. However, given the existing state of licensee emergency preparedness programs, the fact that no information has been received which would indicate the 60 minute criterion is inappropriate, and the anticipated small number of future requests for exceptions to EOF staffing times, it is the staff's view that the EOF staffing time guidance remains adequate.

The staff concludes, on the basis of its assessment of the rationale for deviations from guidance for location of both the primary and backup EOFs and staffing times, that the guidance in NUREG-0737, Supplement 1, is adequate and no changes are necessary. The staff notes that since many of the EOF location exceptions only deviated from the distance guidance in NUREG-0737, Supplement 1, by 0 to 5 miles, the review process could be streamlined by allowing the staff to review and approve or disapprove exceptions, without referral to the Commission, for primary or backup EOFs located 25 miles from the site, i.e., a deviation distance of 5 miles or less from the 20-mile EOF outer boundary criterion. If such an approach is acceptable to the Commission, the staff would continue to refer to the Commission those instances where the exceptions proposed by the licensee significantly deviate from EOF location guidance, such as closer-in or more distant locations, and centralized EOF proposals like those submitted by Duke Power Company and Commonwealth Edison Company. Such instances are expected to be relatively infrequent, and are more appropriate for Commission consideration.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection.

RECOMMENDATIONS:

(1) That based upon this assessment, the staff does not recommend changing the guidance in NUREG-0737, Supplement 1, with respect to locations and staffing times for EOFs.

(2) That the Commission authorize the staff to accept or reject exceptions to the criteria for the locations of EOFs and backup EOFs which are within a distance of 5 miles of the guidance as specified in NUREG-0737, Supplement 1. Cases where the licensee has proposed a significant deviation from the EOF location guidance as described herein would continue to be referred to the Commission for approval.

(3) Note that the staff is still evaluating the concept of a single centralized EOF for utilities with nuclear power plants located on more than one site as noted in SECY-95-274 and will report to the Commission the staff's assessment of this proposal as it relates to the criteria for the locations and staffing times of EOFs in NUREG-0737, Supplement 1.

James M. Taylor
Executive Director
for Operations

Attachments: 1. Table 1, "Emergency Operations Facility," of Supplement 1 to NUREG-0737
2. Exceptions to Locations for EOFs and Backup EOFs
3. Exceptions to Staffing Times for EOFs

Commissioners' comments or consent should be provided directly to the Office of the Secretary by COB Monday, August 19, 1996.

Commission Staff Office comments, if any, should be submitted to the Commissioners NLT Monday, August 12, 1996, with an information copy to the Office of the Secretary. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

DISTRIBUTION:
Commissioners
OGC
OIG
OPA
OIP
OCA
ACRS
ASLBP
REGIONS
EDO
SECY

TABLE 1

EMERGENCY OPERATIONS FACILITY

Option 1
Two Facilities

Close-in Primary: Reduce Habitability*

- o within 10 miles
- o protection factor = 5
- o ventilation isolation with HEPA (no charcoal)

Backup EOF

- o between 10-20 miles
- o no separate, dedicated facility
- o arrangements for portable backup equipment
- o strongly recommended location be coordinated with offsite authorities
- o continuity of dose projection and decision making capability

Option 2
One Facility

- o At or Beyond 10 miles.
- o No special protection factor.
- o If beyond 20 miles, specific approval required by the Commission, and some provision for NRC site team closer to site.
- o Strongly recommended location be coordinated with offsite authorities.

For both Options:

- located outside security boundary
- space for about 10 NRC employees
- none designated for severe phenomena, e.g., earthquakes

labitability requirements are only for the part of the EOF in which dose assessments communications and decision making take place.

f a utility has begun construction of a new building for an EOF that is located with 5 miles, that new acility is acceptable (with less than protection factor of 5 and ventilation isolation and HEPA) provided hat a backup EOF similar to "B" in Option 1 is provided.

ATTACHMENT 1

EXCEPTIONS TO LOCATIONS FOR
EOFs AND BACKUP EOFs

The following sites have been granted an exception to the location criteria in NUREG-0737, Supplement 1, for either the primary EOF, the backup EOF, or the alternate EOF.

REGION - SITE	PRIMARY EOF EXCEPTIONS (Miles)	BACKUP EOF EXCEPTIONS[A] (Miles)
Region I -		
Artificial Island	-	NO ALTERNATE EOF SECY-84-63 [C]
Limerick	21 (>20) SECY-90-072	-
Maine Yankee	-	25(>20) SECY-83-192
Millstone	-	38(>20) SECY-84-176
Peach Bottom	45 (>20) SECY-90-072	-
Susquehanna	22 (>20) SECY-96-057	-
Region II -		
Browns Ferry [B]	104 (>20) CECC CONCEPT [B]	-
Harris	-	21 (>20) ALTERNATE EOF [C]
Hatch	-	21 (>20) SECY-93-004
North Anna	-	29 (>20) SECY-83-478
Summer	-	25 (>20) SECY-84-125
Surry	-	58 (>20) SECY-83-478
Turkey Point	24 (>20) SECY-83-111	-
Watts Bar [B]	50 (>20) CECC CONCEPT [B]	-
Region III -		
Braidwood/Dresden/LaSalle	32-45 (>20) SECY-95-274 [D]	-
Byron	66 (>20) SECY-95-274 [D]	-
Clinton	-	22 (>20) SECY-85-152
Davis-Besse	-	21 (>20) SECY-83-191
Fermi	-	22 (>20) SECY-83-524
Kewaunee	26.1 (>20) SECY-87-311	-
Monticello	-	45 (>20) SECY-83-363
Palisades	9.1 (<10) SECY-87-161	-
Point Beach	-	88 (>20) SECY-90-151
Prairie Island	-	55 (>20) SECY-83-363
Quad Cities	116 (>20) SECY-95-274 [D]	-
Zion	45 (>20) SECY-95-274 [D]	45 (>20) SECY-93-175
Region IV -		
Arkansas Nuclear One	-	7 (<10) SECY-84-19
Callaway	-	25 (>20) SECY-83-161
Palo Verde	-	8 (<10) SECY-83-516
River Bend	-	23 (>20) SECY-83-152

ATTACHMENT 2

EXCEPTIONS TO LOCATIONS FOR
EOFs AND BACKUP EOFs (Continued)

REGION - SITE	PRIMARY EOF EXCEPTIONS (Miles)	BACKUP EOF EXCEPTIONS[A] (Miles)
Region IV (Cont.) -		
San Onofre	-	35 (>20) Commission Vote - Full Power License)
Waterford	-	25 (>20) SECY-83-205
WNP2	-	9.5(<10) ALTERNATE EOF SECY-83-361 [C]
Wolf Creek	-	28 (>20) SECY-95-105
TOTAL EXCEPTIONS	12	23 [C]

ATTACHMENT 2

Note A - In response to SECY-81-509, the Commission authorized the staff to approve an alternate location in place of a backup EOF where licensees had built an EOF with a high degree of habitability within 10 miles of the plant. An alternate location is defined by the Commission as a facility located between 10 and 20 miles of the plant site where utility and Government officials can meet to discuss plant status and appropriate public protective actions, and arrangements have been made to communicate with the Technical Support Center. The seven currently operating sites which have hardened EOFs include Artificial Island, Haddam Neck, Pilgrim, Vermont Yankee, Brunswick, Harris, and WNP2.

Note B - In COMJA-80-37 -- issued prior to NUREG-0737, Supplement 1 --, the Commission accepted the Tennessee Valley Authority's arrangement for a centralized EOF for the Browns Ferry, Watts Bar and Sequoyah facilities, as a special case with the addition of some provisions near each site for the NRC site team. Browns Ferry and Watts Bar exceed the 20-mile EOF location criterion by being located 105 and 50 miles from their sites, respectively. The Sequoyah site is located within the 10-to-20-mile EOF location criterion and, consequently, is not included in this list.

Note C - The 23 exceptions granted for the location of backup EOFs include 3 exceptions (Artificial Island, Harris and WNP2, also listed in Note A above) granted for locating the alternate EOF where utilities have provided hardened EOFs. Artificial Island has a hardened EOF and because of its location (7.5 miles) and its accessibility under accident conditions by State and local government officials, an alternate EOF was not needed. The Harris alternate EOF, located at 21 miles from the site, was granted an exception because the criterion of 20 miles for backup EOFs is exceeded by only 1 mile and the location was satisfactory to State and local governmental officials. The third exception was granted to WNP2 for use of the Washington Public Power Supply System headquarters building as its alternate EOF because it is located 9.5 miles from the site which is only slightly less than the 10-mile criterion for backup EOFs and would allow access to the utility communications center, corporate management, and corporate engineering staff.

Note D - Commonwealth Edison was granted an exception to permit it to staff a corporate EOF beyond 20 miles from the site of its reactor facilities on an interim basis, while emergency personnel are dispatched to the site's primary EOF. (See page 6 for a discussion of this issue.)

EXCEPTIONS TO STAFFING TIMES FOR EOFs

The following sites have been granted an exception from the staffing goal of 60 minutes for the EOF.

REGION - SITE	EXCEPTION TO EOF STAFFING GOAL (Minutes)
Region I	
Susquehanna	90
Region II	
Brunswick	75
Catawba	75
Farley	75
Harris	75
McGuire	75
Oconee	75
Robinson	75
Surry	90
Region III	
Big Rock Point	90
Braidwood/Dresden/LaSalle	240
Bryon	240
Quad Cities	240
Zion	240
Region IV	
South Texas Project	75
Palo Verde	120
Waterford	120
TOTAL EXCEPTIONS	17

ATTACHMENT 3

ATTACHMENT A

TABLE 1

STRAIGHT LINE DISTANCE FROM THE STATIONS

STATION	CENTRAL EOF	NEAR-SITE EOF
Dresden	32 miles	10 miles
Braidwood	40 miles	10 miles
Zion	45 miles	0.5 miles
LaSalle	48 miles	10 miles
Byron	66 miles	20 miles
Quad Cities	116 miles	18 miles

MAP OF COMMONWEALTH EDISON COMPANY'S FACILITIES

1400 Opus Place
Downers Grove, IL 60515

ComEd

Feb. 27, 1997

U.S. Nuclear Regulatory Commission
Washington, DC 20555

Attention: Document Control Desk

Subject: Braidwood Station Units 1 and 2
Byron Station Units 1 and 2
Dresden Station Units 1, 2, and 3
LaSalle County Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2

Commonwealth Edison Response to: USNRC Request for Additional Information dated 12/17/96 regarding the Central Emergency Operations Facility (TAC Nos. M91309, M91310, M91311, M91312, M91313, M91314, M91315, M91316, M91317, M91318, M91319, M91320)

NRC Dockets 50-454 and 50-455
NRC Dockets 50-456 and 50-457
NRC Dockets 50-10, 50-237 and 50-249
NRC Dockets 50-373 and 50-374
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

Reference:

1) ComEd letter, John C. Brons' to USNRC dated January 5, 1995, "Commonwealth Edison Submittal: Proposal to Consolidate Near-Site Emergency Operations Facilities (EOFs) into a Central EOF"

2) USNRC letter, George F. Dick, to D. L. Farrar dated May 23, 1996, "Request for Additional Information regarding the Central Emergency Operations Facility"

3) ComEd letter to USNRC, John B. Hickman, dated August 5, 1993, "Response to Request for Additional Information Related to the Proposed Generating Station Emergency Plans (GSEP) Revision Incorporating the Corporate EOF as an Interim EOF"

4) USNRC letter (G.F. Dick) to ComEd (I.M. Johnson) dated December 17, 1996, "Request for Additional Information regarding the Central Emergency Operations Facility"

EPMISC/Chron/vonk/10

This letter provides the Commonwealth Edison (ComEd) response (Attachment 1) to the most recent Request for Additional Information (Reference 4) pertaining to the consolidation of ComEd's near site Emergency Operations Facilities (EOFs) into a Central EOF (cEOF) (Reference 1). ComEd remains firmly convinced that the consolidation described in Reference 1 provides the most effective response to a classifiable emergency condition in accordance with our Emergency Plan and the overall coordinated plan originally contemplated in NUREG-0654/FEMA Rep. 1.

While this proposal was originally submitted as a Cost Beneficial Licensing Action, and remains so today, this emergency plan change enhances our ability to effectively respond to potential emergencies. A list of the other additional benefits is provided as follows:

- Prompt "minimum staffing" during normal working hours.
- Improved access for greater numbers of ComEd responders off hours.
- Immediate access to various corporate support organizations.
- Enhanced ability of Senior personnel to quickly respond.
- Increased floor space for ComEd, State and Federal Responders.
- Reduced susceptibility to potential near-site problems.
- Proximity to USNRC Regional Headquarters. (10 minute drive time)

ComEd proposes to demonstrate the use of the Downers Grove facility as a single EOF (cEOF) for the 1997 Dresden Full State participation exercise in the summer of 1997. It was last successfully demonstrated in this capacity when performing its licensed function as the back-up EOF for Zion Station in a utility only drill.

ComEd appreciates the opportunity to clarify our submittal. ComEd will also make arrangements with NRR to schedule a meeting to discuss this further with the Staff. Please contact Mrs. I.M. Johnson at (630) 663-2096 if you have any questions pertaining to this response or the proposed meeting.

Sincerely,

John C. Brons
Nuclear Support Vice-President

MV/JCB/hg

EPMISC/Chron/vonk/11

Document Control Desk (3) February 27, 1997

Attachment 1: Specific Response to NRC Request for Additional Information, (Reference 4)

Attachment 2: ComEd Detailed Response with respect to Metropolitan Edison Company (Three mile Island Nuclear Station, Unit No. 1), CLI-83-22, NRC 299, 308 (1983).

cc: A.B. Beach, Regional Administrator , USNRC Region III
R. Capra, Director of Directorate III-2, NRR
G. Dick, ComEd Generic Issues Administrator, NRR
Senior Resident Inspector (Braidwood)
Senior Resident Inspector (Byron)
Senior Resident Inspector (Dresden)
Senior Resident Inspector (LaSalle)
Senior Resident Inspector (Quad Cities)
Senior Resident Inspector (Zion)
R. Wight, Office of Facility Safety, IDNS

Attachment 1
Commonwealth Edison
Detailed Response

to

USNRC Request for Additional Information (RAI)
Related to the Review of
The Central Emergency Operations Facility

1) During its review of the Interim Emergency Operations Facility (EOF) request from the licensee, one of the issues that was addressed was ComEd's ability to staff and activate the facility within 60 minutes. In response to the staff's concerns, ComEd successfully conducted unannounced drills to support its position that the Interim EOF can be activated in a timely manner (60 minutes). However, during an actual event at Quad Cities in May 1996, the licensee took 98 minutes to accomplish the activation of the Interim EOF. What assurances can ComEd provide to the staff that the Central EOF will be staffed and activated within 60 minutes, including off-hours, in accordance with the goal as stated in NUREG-0737, Supplement I (Clarification of TMI Action Plan Requirements)?

ComEd immediately initiated a review of the Quad Cities event to determine lessons learned, and identify needed improvement areas. That evaluation has been provided on several occasions to NRC Staff performing on-site inspections and was summarized in the SALP meeting.

The review concludes the delay in activation of the Interim EOF experienced at Quad Cities was due to a delay in initiating the notification system and would have existed regardless of the location or makeup of the EOFs. The Bulk Power Operator (BPO), assigned responsibility to activate the Computer Response Unit, did not respond to the initial NARS call. The BPO is a position staffed by a ComEd employee 24 hours a day, seven days a week, located in our Bulk Power Office. The BPO is connected to the GSEP system through the Nuclear Accident Reporting System (NARS). This is the system ComEd uses to perform state notifications of an emergency classification.

In past notification schemes, the BPO when notified of the emergency classification would notify the Nuclear Duty Officer (NDO), who in turn would activate the offsite emergency response organization. [The NDO is the person responsible for monitoring operations of the six ComEd Nuclear Stations and acting as a liaison with senior corporate management during events.] In order to minimize the offsite emergency response activation time the responsibility of offsite activation was given directly to the BPO. The BPO was selected for this role because the position is notified simultaneously to the State using the same notification system. This ensures activation of the offsite response organization as the next immediate action after State notification. This activation scheme also does not burden the Control Room at a time when they are focused on reactor safety concerns.

During the Quad Cities event in May 1996, the Station, recognizing that the BPO had not responded to the NARS notification, notified the BPO via land lines. Prior to activating the Interim EOF, the BPO confirmed with the Nuclear Duty Officer that, in fact, the Interim EOF should be activated. Once activated, the Interim EOF responders were notified and responded in a timely manner.

ComEd's internal investigation of the event indicated that had the initiation occurred in normal sequential order all minimum staff would have arrived at the Interim EOF in approximately 65 minutes.

Efforts to prevent recurrence of this particular problem were directed toward the BPO function. BPO Procedure 13-4.05 was enhanced in July to further emphasize the order and importance of notifications. The emphasis is placed upon the fact that Interim EOF activation is the first priority following NARS notification, followed then by notification of the NDO. The NDO's procedure has also been modified to check activation of the Interim EOF, immediately following his notification by the BPO. In parallel to the procedure changes, supervision in the Bulk Power Office reinforced to the onshift BPOs the importance of the notification requirements. Three drills using simulated NARS notifications have been conducted with BPO since the implementation of the corrective actions to ensure effectiveness. On-shift BPOs correctly initiated the appropriate facility activation.

For events initiated at an ALERT classification, it remains ComEd's intention to activate the cEOF staff, equivalent to the Interim EOF staff (13 people) as approved by the Nuclear Regulatory Commission, for either daytime or off-hours events. The remainder of the EOF staff would then be activated should the classification increase to Site Area or General Emergency.

The changes implemented since the Quad Cities event and the continuing commitment to staff the Interim EOF or, following approval, the staff described above for the cEOF are designed to provide assurance of ComEd's commitment to the staffing of an EOF in accordance with the 60 minute goal described in NUREG-0654. These commitments will be carried over into the activation of the cEOF staff.

2) It is the expectation of the staff and the general practice of the industry that from the time a Site Area Emergency or General Emergency is declared activation of an EOF should occur within 60 minutes. Please indicate the time at which the "activation clock" is started and the criteria used to determine when the EOF is activated for the ComEd Central EOF.

ComEd considers the activation clock, as it applies to the NUREG-0654 staffing goals to start at the classification time of the event. This classification time is recorded on the NARS form. The clock is stopped when the minimum staff (defined in the GSEP) is in the appropriate facility. For example, if the Site Emergency were classified at 10:00 AM the clock for determination of attaining the staffing goal in accordance with NUREG-0654 would expire at 11:00 AM. To further enhance ComEd's ability to staff the offsite facilities within the one hour goal ComEd intends to staff cEOF positions equivalent to the current Interim EOF staff at the ALERT or above for either daytime or offhours events as described in the answer to Question 1. The remainder of the full cEOF staff will be activated at a Site Area Emergency Classification or higher.

3) The conduct of a full participation exposure and ingestion pathway exercise as specified in 10 CFR 50, Appendix E (F)(2)(c) and (d) would fully demonstrate the functionality of the Central EOF. Please indicate to the staff how this will be accomplished.

As specified in 10 CFR 50, Appendix E (F)(2)(c), ComEd will conduct a full scale exercise with the State of Illinois at Dresden on August 20, 1997. We intend to use the cEOF, as a fully staffed, stand alone EOF for this exercise to fully demonstrate the functionality of the concept. We offered and continue to offer the NRC the opportunity to participate in this exercise.

With regard to the ingestion pathway requirements specified in 10 CFR Part 50, Appendix E (F)(2)(d), these requirements apply to the states. ingestion activities are a function of the states and, to the degree requested, the Federal agencies. Licensees have minimal, if any, activities to be performed in ingestion exercises or real event ingestion activities. Ingestion activities have been demonstrated at the Zion Federal Field Exercise in 1987 (Wisconsin & Illinois), the Byron Ingestion Exercise in 1989 (Wisconsin & Illinois), the Quad Cities Ingestion Exercise in 1990 (Iowa), and the Dresden Ingestion Exercise in 1995 (Indiana & Illinois). ComEd, as the licensee, had no role in ingestion activities. The states successfully demonstrated the exercise objectives related to ingestion pathway requirements operating out of their respective Emergency Operations Centers and not the Licensee's EOF. No ingestion pathway exercise involving ComEd is scheduled to be conducted until 2001.

4) In response to question 8 of the staff's May 23, 1996 RAI, ComEd indicated that any of its six stations' Technical Support Centers (TSC) can act as a back up to the Central EOF. Please provide information on the use of these TSCs as a backup, including the present and future plans, arrangements, training, procedures and experience using this approach.

In the highly unlikely event that ComEd would be unable to use the cEOF, the TSC at an unaffected station could provide adequate capabilities to function as an EOF. All TSCs are connected with the same redundant communications channels as the EOF. Access to computer programs necessary for emergency response are available through the ComEd Wide Area Network. With regard to staffing, unaffected station staff would be already available to initially staff with existing qualified TSC personnel and take on EOF duties. The existing station TSC staff's parallel EOF staff in training and positions and in many instances personnel are qualified EOF responders. The stations have repeatedly demonstrated the capability to staff their respective TSC's within 60 minutes (both daytime and off-hours). The station staff responding would be supplemented as needed by qualified EOF responders.

ComEd has no immediate plans to make additional changes to the TSC with respect to training, organization, or physical arrangement to formalize the use of a TSC as a cEOF back-up.

5) In ComEd's response to question 12 of the staff's May 23, 1996 RAI, ComEd stated that the NRC site team could use the current EOF's in order to be located near the site. Please provide additional information regarding the number and type of personnel, physical arrangements, communications, and other support requirements that would be available.

ComEd anticipates that NRC would send site team members to the station's Technical Support Center, the Operational Support Center and the Joint Public Information Center, and that the remainder of the site team would report to the central EOF.

For those NRC personnel who desire near site space, ComEd intends to maintain the facilities currently at Mazon (Dresden, Braidwood, & LaSalle), Morrison (Quad Cities), Dixon (Byron), as Joint Press Information Centers (JPICs). The dedicated space currently assigned the NRC for EOF purposes would be available.

For Zion, no ComEd personnel dedicated to Emergency Response at what is now the Zion nearsite EOF would be present under the new system. Like the other existing EOFs the NRC room currently maintained for dedicated NRC use in an emergency would continue to be maintained. ComEd could provide an individual to assist with access and setup of the workspace maintained for NRC. The Public Information staff would continue to be maintained at the Highland Park JPIC. If the NRC desires, the FTS communications already installed in the dedicated rooms can be maintained. The currently available NRC counterpart seating that exists at any the EOFs will be eliminated. The space currently provided in the NRC rooms has been demonstrated to be adequate during exercises in which the NRC has played.

Beyond the floor space and communications listed below and the staffing described above, ComEd does not propose to provide any additional staffing, plant documents, or supplies to these facilities beyond what is needed to support public information activities.

NRC Room

Dixon Facility	Dimensions:	24' by 30'
	FTS Phone Lines:	6
Mazon Facility	Dimensions:	17' by 28'
	FTS Phone Lines:	6
Morrison Facility	Dimensions:	17' by 28'
	FTS Phone Lines:	6
Zion Facility	Dimensions:	32' by 30'
	FTS Phone Lines:	6

6) ComEd's response to question 13 of the staff's May 23, 1996 RAI, did not adequately answer the question regarding accommodating Federal, State and local response agencies, if in the future, those agencies wanted to send personnel to the site. Please provide information on how Federal, State, and local response agencies would be accommodated near the plant?

Responding agencies have already designated those locations near the plant to which they intend to respond. A detailed summary of these facilities is provided below. Designated available locations provide sufficient opportunity for nearsite (beyond EPZ) operations and coordination.

In addition to the Radiological Emergency Assessment Center (Springfield, IL), the Illinois Department of Nuclear Safety (IDNS) currently dispatches their resident inspectors to the plant Technical Support Center. In addition, IDNS establishes a Radiological Assessment Field Team (RAFT) location near the plant site. This team is dispatched by IDNS in Springfield and reports to an existing forward operating location. For the long term, the RAFT will most likely co-locate with Federal Radiological Monitoring and Assessment Center (FRMAC) or vice versa. The RAFT locations are described below.

Station	RAFT Location	Distance to Site (miles)*
Dresden	Mazon Middle School Mazon, IL	10
LaSalle	Mazon Middle School Mazon, IL	12
Braidwood	Mazon Middle School Mazon, IL	12
Byron	Rochelle IDNS Office Rochelle, Illinois	13
Quad Cities	Garden Plain Township Bldg. Garden Plain, IL	11
Zion	Warren Township Center Warren Township, IL	13

* Straight line distance

In addition to the State Emergency Operations Center (Springfield, IL), Illinois Emergency Management Agency (IEMA) establishes a State Forward Command Post (SFCP) nearsite but beyond the EPZ. IEMA, as does other states, uses such forward operations for disasters of all types. Illinois, for example, activated the SFCP at the Mazon facility for the flooding in Northern Illinois in 1996. The SFCP locations are described below.

Station	SFCP Location	Distance to Site (miles)
Dresden	Mazon Facility Mazon, IL	10
LaSalle	Mazon Facility Mazon, IL	13
Braidwood	Mazon Facility Mazon, IL	10
Byron	Lee County EOC Dixon, Illinois	19
Quad Cities	Garden Plain Township Bldg. Garden Plain, IL	11
Zion	Lake County Fair Grounds* Lake County, IL	13

* Illinois is currently planning to move to this facility. This was also the site of the DFO and FRMAC during the Zion Federal Field Exercise.

In addition to the State Emergency Operations Center (Des Moines, IA), the State of Iowa also establishes a SFCP location in Stockton, Iowa. The Iowa Field Team Coordination Group was previously located with the Illinois RAFT at Garden Plain. Exercise performance showed that, given the improvements in available communication resources, the improved timeliness of response to the Iowa Forward Command Post, and the ability to remain away from the potentially contaminated area, the Iowa teams coordination has been relocated from a joint Iowa/Illinois center to the Iowa Forward Command Post in Stockton Iowa. Stockton Iowa is approximately 30 miles southwest of the Quad Cities Station.

In addition to the State Emergency Operations Center (Madison, WI), The State of Wisconsin establishes a Forward Operating Center/Mobile Laboratory at the National Guard Armory in Kenosha, Wisconsin. The Armory is located approximately 18 miles from Zion Station.

County Emergency Operations Centers (EOC) are located nearsite but are beyond the 10 mile EPZ. Current county plans do not provide for any presence in the EOF. County decisionmakers have expressed a desire to remain with their support staff at their respective EOCs to be certain all necessary decisions are being handled properly.

ComEd understands and appreciates the NRC's concern that the use of the cEOF would remove the current EOF's as potential sources of discretionary space should it be desired by other Federal agencies. Although the provision of such discretionary space is not required by NRC regulations, ComEd believes that such discretionary space would be available, nearsite, for Federal agencies, at the Disaster Field Office and the FRMAC as contemplated by Federal Plans.

The designated locations described above provide sufficient location and opportunity for nearsite, and beyond EPZ, operations and coordination.

7) In response to question 15 of the staff's May 23, 1996 RAI, ComEd discussed its layered communications system. Are any of these systems dedicated for emergency preparedness? How often is the computerized call out system tested and what is its reliability record since being installed?

ComEd does have a layered communication system which provides a defense in depth philosophy to communications. The phone systems that are dedicated for emergency preparedness are described in the approved Generating Stations Emergency Plan. Those dedicated phones are described below.

Nuclear Accident Reporting System - Activated from the Control Room, TSC, Interim EOF, EOFs, or State EOC's. Used to contact states and locals.

Decisionmakers Conference Lines - Available for Zion and Quad Cities only. Activated by TSC, Interim EOF, EOFs, or State locations. Used to connect licensee decisionmakers with state technical decisionmakers.

Generating Station Emergency Plan (GSEP) Phone - Available from TSC, Interim EOF, & EOF. Used to connect licensee decisionmakers.

Alternate (GSEP) Phone - Available from Control Room, TSC, Interim EOF, & EOF. Used to transmit technical information between licensee facilities.

Environmental Party Line - Available from TSC, Interim EOF, & EOF. Allows personnel of the same discipline to conference up to six different locations at the same time.

With regard to the computerized callout system reliability record, ComEd conducted six drills and one actual callout during 1996. While the computer system adequately handled callout of the Interim EOF staff , it could not be successfully programmed in a cost effective manner, to callout the full EOF staff. Consequently, ComEd has contracted with Community Alert Network (CAN) which has been used successfully by other utilities to perform callouts. CAN has the capability to handle 6,000 calls/hour (100 calls/min). CAN functions from two locations (Reno Nevada and Schenectady New York) that backup each other. Each CAN location has backup power and backup computer systems.

The CAN system will be placed in operation in the first quarter of 1997. ComEd intends to test the callout capability at least quarterly.

Eleven Augmentation Drills involving the Interim EOF have been conducted since the implementation of the VRU system and are summarized below.

Augmentation Drill Results
using the VRU System

Date	Success	Reason
09/18/95	Yes (Note 1)	
11/21/95	Fail	Computer Failure (Note 2)
12/18/95	Yes	
01/31/96	Staff Late	1 designated Minimum Staff position, theTechnical Support Manager was not contacted.
03/04/96	Undetermined (Note 3)	
03/25/96	Staff Late	1 designated Minimum Staff position, a Radiation Protection responder (1 of 2 equivalently qualified responders) was not available for 85 minutes.
04/16/96	Staff Late	1 Minimum Staff position, the Technical Support Manager was not available for 93 minutes. (Note 4)

05/10/96	Staff Late	Quad Cities Actual Event. BPO delayed activation for approximately 30 minutes. (See Question 1)
09/11/96	Undetermined	Computer Record Failure (Note 5) (Note 2)
12/05/96	Undetermined	Computer Record Failure (Note 5) (Note 2)
01/29/97	Yes	

Note 1: Yes = Minimum Staff attained in 60 minutes based on drive times
Note 2: The Backup Notification System was activated following the results of the surveillance for facility staffing.
Note 3: Dual Activation Codes were entered which eliminated time record data. Individuals were contacted but time of response could not be determined.
Note 4: Additional Technical Support Managers with Downers Grove assignments were identified and qualified.
Note 5: Computer Time Stamp was lost. Individuals were contacted but without time stamp time estimate was not possible.

The backup system to the computer actuated call-out consists of Corporate Emergency Preparedness Staff assigned pager responsibility for four pre-designated call lists. Two lists divide the Interim EOF responders and the remaining two support normal nearsite EOF call-out. Each caller is provided an approved procedure including an updated copy of the current Emergency Responder phone directory. The back-up system is tested weekly for pager functionality and semi-annually for call-out capability as a portion of the full EOF augmentation drill. In addition, senior Emergency Preparedness Staff are maintained on the same pager system with access to all four of the call-out lists and can be activated by the Nuclear Duty Officer to support any of the pre-designated call-outs.

Pursuant to these surveillance results, ComEd has continued to evaluate timely staffing of offsite Emergency Response Facilities. The existing VRU system has demonstrated the ability to rapidly notify offsite responders to initiate staffing of the facilities. To further facilitate timely response, ComEd has continued to evaluate personnel qualifications and identify additional responders to further improve the capability. Approximately 50 additional responders where identified in the Corporate organization for training and qualification. ComEd has not been satisfied with the record management capability of the VRU system. The surveillance results led us to further evaluate the technology currently available and begin conversion to the CAN system previously described.

8) Please explain how the use of a centralized EOF provides the "optimum" functional characteristics specified in NUREG-0696, "Functional Criteria for Emergency Response Facilities," (pp. 17-18) as compared to a near-site EOF. Please include in your response consideration of the Commission's determination that face-to-face -- rather than telephone -- communications between a licensee and offsite officials provide the best means to exchange information and formulate protective action recommendations. Metropolitan Edison Company (Three mile Island Nuclear Station, Unit No. 1), CLI-83-22, NRC 299, 308 (1983).

NUREG-0696 is guidance to licensees on how to implement the NRC's emergency preparedness requirements. Neither it, nor the underlying requirements explicitly recommend face-to-face communication. Reliance on face-to-face communications arose in the context of a specific case in which the State and local officials argued strongly for such communications in the face of opposition by the licensee. The Commission, consistent with its policy of supporting State and local officials in emergency preparedness matters, responded to State and local concerns by supporting face-to-face communications in that case. Where the facts are completely different, as they are here, because State and local officials have no desire to rely on face-to-face communication but, instead, have relied consistently on communication technology that was not available earlier, the imposition of face-to-face communication would be inconsistent with Commission policy.

This origin of the preference for face-to-face communications is important for several reasons. First, it shows that the Commission is especially sensitive to the communication needs of State and local officials. Where, as here, those officials have expressed no interest in face-to-face communications but, rather, prefer to rely on modern communication techniques that were not available when the Commission made its decision in the TMI-1 case, this precedent indicates that the Commission will honor that position and not impose such communications. Second, face-to-face communications was not considered by the NRC to be a generic "optimum functional characteristic of emergency response. Face-to-face communications was not among the characteristics enumerated in NUREG-0696. Third, even if face-to-face communication has become an "optimum" characteristic of emergency preparedness, its history shows that its consideration as an "optimum" characteristic is relative, based on the specific situation. Face-to-face communication may be an "optimum" characteristic where it is desired by State and local officials, it cannot be so considered where those officials have expressed a clear desire to rely on other, more modern means of communication. Finally, even if face-to-face communication is viewed by the NRC as a generically applicable "optimum" characteristic of emergency preparedness, it is not required to be adopted by a licensee, especially where it would serve no purpose. There is no regulatory requirement to adopt the "optimum" functional characteristics in NUREG-0696. Reasonable assurance of adequate protection is the well established regulatory standard. It is met in this case where State and local officials have determined that they can best engage in the necessary communication with the licensee by using modern communication technology. Consistent with it, prior deference to such State and local decisions, the Commission should honor those desires in this case too and not impose an unnecessary and unwanted requirement for face-to-face communication.

See Attachment 2 for additional clarification to this response.

ATTACHMENT 2

ComEd Detailed Response with respect to Metropolitan Edison Company
(Three mile Island Nuclear Station, Unit No. 1),
CLI-83-22, NRC 299, 308 (1983).

8) Please explain how the use of a centralized EOF provides the "optimum" functional characteristics specified in NUREG-0696, "Functional Criteria for Emergency Response Facilities," (pp. 17-18) as compared to a near-site EOF. Please include in your response consideration of the Commission's determination that face-to-face -- rather than telephone -- communications between a licensee and offsite officials provide the best means to exchange information and formulate protective action recommendations. Metropolitan Edison Company (Three mile Island Nuclear Station, Unit No. 1), CLI-83-22, NRC 299, 308 (1983).

To more fully answer this question, it is useful first to establish the framework in which the answer must be evaluated. NUREG-0696 is a draft report. It "describes a set of NRC functional criteria for nuclear power plant emergency facilities." The functional criterion that is relevant to this response is that the "EOF is designed to provide assistance in the decision making process to protect the public health and safety". To implement this criterion the NUREG contemplates that the "EOF shall be the location where the licensee will provide current information on conditions potentially affecting the public to the NRC and to State and local emergency response agencies." In particular, to fulfill the function of providing information, "[a]dequate communications systems are necessary for the EOF to ... disseminate information to responsible government agencies. ...As a minimum, priority access voice communication links shall be provided between the EOF and ... State and local emergency response networks."

NUREG-0696 is guidance on how the emergency preparedness requirements should be implemented. The staff stresses that NUREG-0696, ... provides guidance to licensees on how they can adequately implement the Commission's emergency planning regulations". Under well-established NRC practice, it does not establish requirements. That conclusion is particularly important in this case because licensees must be responsive to the methods of communication that are preferred by the State and local officials. Where State and local officials prefer to rely on adequate voice communications systems exclusively and choose not to engage in face-to-face communication, a licensee could not be found to be in non-compliance with NRC emergency preparedness requirements when it cannot alter the decision of those government agencies.

As guidance, NUREG-0696 describes the "optimum" functional characteristics for an EOF. Since reasonable assurance is a regulatory standard, there is an implication that there is a range of alternatives, which may be considered less than optimum in some sense, that are also acceptable to as demonstrate compliance with the NRC emergency preparedness requirements. 10 CFR 50.47 and Appendix E to 10 CFR Part 50 require licensees to adopt the optimum alternative for implementing the rule. Flexibility in implementation is especially important where, as here, the State and local officials clearly have determined that face-to-face communication would be optimum for them. Since this is the choice of the State and local officials, the licensee has no choice but to defer to them. This is consistent with the NRC's cooperation with State and local officials in this particular area, as is clearly shown by the TMI-Decision.

In the TMI-Decision, the issue decided by the Commission was narrowly limited to when responsibilities for making radiological assessments and protective action recommendations needed to be transferred from the Emergency Director in the control room to the Emergency Support Director in the EOF.

> There is no dispute between the parties regarding the functions that are to be performed from the EOF during an emergency, the controversy centers on how quickly that facility must be fully functional following the declaration of a site emergency.
> [18 NRC 306]

The Commission determined that such transfer should occur no later than one hour following the declaration of an emergency. In reaching that decision, the Commission relied principally on the need to minimize confusion in control room, and in part on the desires of the Commonwealth of Pennsylvania to engage in face-to-face communication in the control room promptly after the declaration of an emergency.

The Commonwealth's position was summarized by the Commission as follows:

> The Commonwealth also disagrees with the Appeal board. Its primary concern is with the adequacy of information exchange and the interaction between Commonwealth and Licensee officials during the early state of an accident. It emphasizes that the ultimate decision regarding protective actions is made by the Governor, based on recommendations received from his designated representative at the site. The Commonwealth stresses that the process of protective action decisionmaking is bi-directional and that in making its recommendation to the state, the Licensee will need information such as weather and road conditions as well as information regarding the specific technical status of the plant. The Commonwealth asserts that the EOF is the facility specifically designed for the exchange of information between the officials of the utility and the representative of the Commonwealth and where the implications of that information can be discussed. Accordingly it believes Licensee's proposal would impede necessary exchanges of information.

In response, the Commission adopted the Commonwealth's concern:

> Furthermore, as the Commonwealth stresses, the EOF is the ideal place for face-to-face communications regarding protective actions recommendations between federal, state, and local officials, and the Licensee official charged with making the recommendations to the Commonwealth. The Commission does not believe, as Licensee suggests, that telephonic communications between the governmental officials in the EOF and the Licensee's decisionmaker in the control room provide an equivalent opportunity for an exchange of information. The Commission views the opportunity for face-to-face communications as the best means to exchange pertinent information between government officials and the Licensee and to formulate protective action recommendations, particularly when it is essential that there not be misunderstandings between those involved.
> [18 NRC 30]

Since 1983, when this dictum was written, the situation regarding emergency preparedness has changed substantially in general and in particular for Commonwealth Edison. Electronic communications have improved in ways that could not have been anticipated. Many exercises have been held to provide clearer insights into the limits on the value of face-to-face communication. New avenues have been opened for transmitting plant status to State and local officials.

For Commonwealth Edison, the changes since 1983 have been especially dramatic. State and local officials have affirmatively declared that face-to-face communication is not their preferred mode for communicating with licensees. Years of successful exercises have demonstrated that the alternative provided by technologically improved communication equipment provides more than adequate opportunities to communicate effectively. Plant status information is transmitted regularly to the Illinois Department of Nuclear Safety in a manner not contemplated in 1983. Illinois' Reactor Data Link (RDL) is a real time computer link from the six stations on-line computer monitoring system, directly to Springfield, In excess of 1000 data points, identified as critical by ComEd and IDNS personnel are transmitted to the Radiological Emergency Assessment Center (REAC) in Springfield on a continuous basis. IDNS personnel have developed extensive analytical techniques to assess plant conditions based on this data. Similarly, with the adoption of the NRC's Emergency Response Data System (ERDS), plant status, selected as critical by the Nuclear Regulatory Commission, is transmitted to the Rockville Operations Center and the Regions Incident Response Center. ERDS is subsequently available to those affected states. These factors clearly demonstrate that the reasons for the Commission's TMI-Decision do not apply to this request for a cEOF.

For the Commission to follow its underlying logic in the TMI-Decision as applied to this request, the Commission would need to take into account the communication desires of the State and local officials, as it took into account the desires of the Commonwealth of Pennsylvania. Since the states and local officials do not desire face-to-face communication they Commission would conclude that face-to-face communication is not an optimum functional characteristic for this situation.

Finally, it should be noted that the guidance in NUREG-0696 does not explicitly recommend fact-to-face communications between licensee and offsite officials. A licensee, by using adequate voice communication systems, would use the EOF as the location to provide current information to State and local emergency response agencies. Accordingly, face-to-face communications were not considered at the time to be an optimum functional characteristic of an EOF.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON D.C. 20555

COMJA-80-

OFFICE OF THE
SECRETARY

January 21, 1981

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: ACTION PLAN III.A.1.2 - EOF

Subsequent to the October 30, 1980 Commission meeting on the subject matter, the staff responded by memorandum dated November 12, 1980 in which a number of options were delineated (Enclosure 1 of November 12, 1980 memorandum - a marked-up copy is enclosed).

Among the various options proposed for EOF's, the Commission approves Option 2 (two facilities) for all reactor facilities licensed or to be licensed for operation. The Commission also approves a modified Option 4 (one facility and no protection factor) for all reactors if the EOF is located at or beyond 10 miles from the reactor with the provision that if the EOF is located beyond 20 miles, specific Commission approval is required* and arrangements to locate the NRC staff closer to the reactor are provided. The footnotes in Enclosure 1 to the November 12 memorandum apply, as noted on the modified copy enclosed. The TVA arrangement for a centralized EOF is acceptable as a special case of Option 4, with the addition of some provisions near each site for the NRC site team. These provisions need not be elaborate and would be satisfied by a trailer with connections to the TVA emergency communications network.

The Commission as a whole does not have a preference for either of the two options. In coming to this decision, the Commission recognizes that it is the licensees' responsibility to decide where and how their EOF should be built, as long as they meet the criteria required by either option, as modified by this memorandum.

---

*Chairman Ahearne believes that the EDO is capable of determining the acceptability of exceptions to guidelines in either option without further Commission guidance.

8108310251

Attachment 13

By this memorandum, the staff is hereby instructed to proceed with the issuance of Action Plan III.A.1.2.

Enclosure:
As Stated

cc:
Chairman Ahearne
Commissioner Gilinsky
Commissioner Hendrie
Commissioner Bradford
Commission Staff Offices

file

NOV 1 2 1980

See Rec / Purple

dates?

MEMORANDUM FOR: Chairman Ahearne
Commissioner Gilinsky
Commissioner Hendrie
Commissioner Bradford

FROM: William J. Dircks
Executive Director for Operations

SUBJECT: ACTION PLAN III.A.1.2 - EOF

At the Commission meeting of October 30, the staff presented two options for the location of the Emergency Operations Facility. These options are included in Enclosure 1 which also contains a number of other options which we believe are responsive to the objectives discussed on October 30. The staff prefers Option 4. Enclosure 2 is a revised clarification for TMI Action Plan Item III.A.1.2 to replace the section deleted from the previous post-TMI requirement clarification document.

(Signed) William J. Dircks

William J. Dircks
Executive Director for Operations

Enclosures:
As Stated

cc: /enclosures
SECY
OPE
OGC

Contact: D. G. Eisenhut
X27672

DUPLICATE DOCUMENT

Entire document previously entered into system under:

ANO 8101080232

No. of pages: 9

0232

D

20

NRC FORM 318 (9-76) NRCM 0240

☆ U.S. GOVERNMENT PRINTING OFFICE 1979 289 369

ENCLOSURE 1

EMERGENCY OPERATIONS FACILITY

OPTION 1*
One Facility

- Within about 10 miles
- Fully habitable following Accident***
- Specified Protection Factors

PF	Distance
50	1/2 Mile
20	1 Mile
10	5 Miles
5	10 Miles

- Ventilation system isolation with
  - HEPA filters
  - Charcoal filters

OPTION 2*
Two Facilities**

A. Close-in primary; reduced habitability***
- within 10 miles
- protection factor = 5
- ventilation isolation with HEPA (no charcoal)

B. Backup EOF
- between 10-20 miles
- no separate, dedicated facility
- arrangements for portable backup equipment
- strongly recommend location be coordinated with offsite authorities
- continuity of dose projection and decision making capability

OPTION 3*
One Facility**
- 5 to 15 miles
- Well engineered, no special protection factors
- No special ventilation isolation or filters
- Strongly recommend location be coordinated with offsite authorities

OPTION 3A*
Two Facilities**

A. Close-in primary; reduced habitability
- About 5 miles
- Well engineered, no special protection factors
- No special ventilation isolation or filters
- Strongly recommend location be coordinated with offsite authorities

B. Backup EOF
- Between 10-20 miles
- No separate, Dedicated facility
- Arrangements for portable backup equipment
- Strongly recommend location be coordinated with offsite authorities
- Continuity of dose projection and decision making capability

OPTION 4:
One Facility**
- 5 to 15 miles
- Well engineered
- If 5 to 10 miles, protection factor ≥ 10
- If 5 to 10 miles, ventilation isolation and HEPA filters
- Strongly recommend location be coordinated with offsite authorities

- For all Options:
  - Located out the security boundary
  - Space for about 10 EOF employees
  - Done designed for severe phenomena, e.g., earthquakes

** For Options 2 and 4, if in response to this requirement a utility has begun construction of a new building for an EOF that is located within 5 miles, that new facility is acceptable provided that a backup EOF similar to "B" in Option 2 or 3A is provided.

*** Habitability requirements are only for that part of the EOF in which dose assessments communications and decision making take place.

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE
SECRETARY

June 12, 1984

ACTION - DeYoung
Cys: Dircks
Roe
Rehm
Stello
Denton
Eisenhut
GCunningham
O'Reilly
EWilliams

MEMORANDUM FOR: William J. Dircks, Executive Director for Operations

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-84-89/89A - EMERGENCY OPERATIONS FACILITY FOR THE OCONEE NUCLEAR STATION, UNITS 1, 2 AND 3

This is to advise you that the Commission has not objected to the staff's proposed disapproval of the Duke Power Company's request for an exception to the distance requirement for an EOF location. Accordingly you should proceed to advise the licensee.

cc: Chairman Palladino
Commissioner Gilinsky
Commissioner Roberts
Commissioner Asselstine
Commissioner Bernthal
OGC
OPE

Rec'd Off. EDO
Date 6-13-84
Time 12:30 p.m.

Attachment 14

February 22, 1984

POLICY ISSUE

(NEGATIVE CONSENT)

SECY-84-89

For: The Commissioners

From: William J. Dircks
Executive Director for Operations

Subject: EMERGENCY OPERATIONS FACILITY FOR THE OCONEE NUCLEAR STATION, UNITS 1, 2 and 3

Purpose: To request Commission review of a staff disapproval of a licensee's request for an exception to establish an Emergency Operations Facility (EOF) 125 miles from the Oconee Nuclear Station, Units 1, 2 and 3.

Category: This paper covers a minor policy question.

Issue: Whether the Duke Power Company can establish a EOF for the Oconee Nuclear Station in the company general offices, 125 miles from the plant site.

Alternatives:

1. The Commission can agree with the proposed staff disapproval of a request for an exception by the Duke Power Company to establish the EOF for the Oconee Nuclear Station 125 miles from the plant site.

2. The Commission can disagree with the proposed staff disapproval of the licensee's request for an exception.

Background: On January 21, 1981, the Commission approved two options for the location of the EOF at nuclear power plant sites in COMJA-80-37. One option allowed for a single EOF location between 10 and 20 miles from the site with no habitability features. The second option allowed for a primary EOF located up to 10 miles from the site with habitability features and a backup EOF without habitability features located between 10 and 20 miles from the site.

In the Chilk to Dircks memorandum of September 30, 1981 responding to SECY 81-509, the Commission disapproved a recommendation that the staff have the authority to approve licensee requests for exceptions to COMJA-80-37 concerning EOF location and backup criteria where the licensee had provided a heavily shielded EOF located within 10 miles or less of the plant site without a backup EOF. The Commission

CONTACT:
E. F. Williams, IE
492-7611

stated in this memorandum that the staff could accept such facilities provided each emergency plan identified an alternate location where utility and government officials can meet and have contingency arrangements for communications to the Technical Support Center (TSC).

On July 16, 1982, the Commission approved SECY 82-111B, and on November 22, 1982 the Commission approved Supplement 1 to NUREG-0737 which was subsequently promulgated in Generic Letter 82-33 dated December 17, 1982. Table 1 included in these documents is the same table from COMJA-80-37 which describes the EOF location options.

On March 2, 1983, the Commission directed the staff to refer all exception requests concerning location and habitability of EOFs, along with proposed staff actions, to the Commission for decision (M830302B).

Discussion:

The original EOF design concept for the Oconee Nuclear Station was to provide a primary EOF in the Oconee Training Center, one half mile from the reactor containments and a backup EOF in Liberty, South Carolina, 14 miles from the plant site as described in Duke Power Company letters of June 1, 1981 (Enclosure 1) and December 3, 1982 (Enclosure 2). The primary EOF was designed to provide a radiation protection factor (PF) of 50, but the ventilation system was not equipped with HEPA filters and was not designed to be isolated. The backup EOF was to be located in the Duke Power retail office in Liberty. Both of these EOFs were to be established in existing buildings.

In a letter dated June 3, 1983 (Enclosure 3), Duke Power proposes to provide a centralized EOF for the Oconee Nuclear Station, the McGuire Nuclear Station and the Catawba Nuclear Station to be located in the Duke General Offices in Charlotte, North Carolina, 16 miles from McGuire, 17 miles from Catawba and 125 miles from Oconee. Since these distances are within those listed in Table 1 of Supplement 1 to NUREG-0737 for both the McGuire and Catawba plant sites, Duke Power requests an exception only for the distance to the Oconee Nuclear Station. The reason given for requesting the exception to the distance requirement for Oconee is that the staff of the EOF normally work in the Duke General Offices which allows them to respond more quickly and efficiently rather than having to transport them to Oconee. Duke Power states that the time required to activate the original primary EOF at the Oconee Station is three hours while the EOF at the Duke General Offices can be activated in one hour or less because of the decreased driving distance. In addition,

the computer for the emergency data acquisition system for all three plant sites is located in the Duke General Offices and the communications system available in Charlotte is better than the communications system near the Oconee plant site. Duke Power has a microwave communications net between Oconee and Charlotte as well as a ring-down system between the TSC and dedicated lines for specific state interfaces for management, radiological information and media coordination. Duke Power states that it makes no difference whether the EOF is located 10 to 20 miles or 125 miles from the plant site, since they communicate with the plant, State and local personnel by telephone and the plant data is as available in Charlotte as it is near Oconee. Also the cost of maintaining one centralized EOF is less than providing a separate EOF for the Oconee Station.

Personnel from Duke Power and the State of South Carolina met with the NRC staff on September 6, 1983 to present their arguments and provide additional information in support of the request for an exception. In this presentation Duke Power stated that the EOF personnel would be transferred to the Oconee plant site as soon as the emergency phase of the accident has concluded. The personnel from the Duke General Offices who staff the Joint News Center at the Oconee Station will be transported by helicopter to a landing pad at the site within one hour. The reason given for not utilizing helicopters for the EOF personnel was that between 75 and 100 individuals must be transported to the EOF. The reason given for not modifying the original primary EOF was that these modifications would cost approximately $350,000 and the operation of a single EOF for all three Duke nuclear power plants was more efficient and effective. Although the representatives from the South Carolina Department of Health and Environmental Control and the Department of State, Emergency Preparedness Division stated that they did not object to the Oconee EOF being located in Charlotte, they intended to respond to the Forward Emergency Operations Center located at the National Guard Armory in Clemson near the site to perform their functions and would send a liaison representative to the Charlotte EOF. In a letter dated October 25, 1983 (Enclosure 4), Duke Power restates the advantages of the Charlotte location and the difficulty in relocating the EOF staff to Oconee.

The staff believes that this type of accident management will not provide for an adequate response. The principal emergency management and the EOF staff will be unable to interact directly with their Federal, State and local counterparts located near the plant site. In addition, the Duke Recovery Manager will not be in face-to-face communication with the NRC Director of Site Operations. While the local communications system around the Oconee site may not have the same capacity as that in the Charlotte area, these same problems of site area communications will exist whether the EOF is in Charlotte or near the site since the same local system must be used. However, since the Recovery Manager is in Charlotte, he cannot go directly to the plant or the State Foward Emergency Operations Center to confer with these managers if needed. All communications between the Recovery Manager and the appropriate Federal, State and local officials will be limited to voice communications. This isolation of the EOF management and staff from the plant site will result in a higher degree of interfacing by the NRC site team and offsite officials with Duke personnel located in the Oconee TSC and the Joint News Center, which is inappropriate and may result in confusion, impeding the emergency response. This type of remote accident management did not prove to be successful during the TMI-2 accident. For these reasons the staff has previously recommended approval of only two EOF locations under Option 2 in Table 1 of Supplement 1 to NUREG-0737 which are located beyond 20 miles of the plant site (Rancho Seco at 23 miles and Turkey Point at 24 miles). Both these EOFs are located at corporate headquarters with helicopter service between the EOF and the plant. The Commission has previously approved a centralized EOF for TVA which is located in Chattanooga, Tennessee, 110 miles from the Browns Ferry Nuclear Plant and 45 miles from the Watts Bar Nuclear Plant.

It is the staff's opinion that Duke Power should either modify the original Oconee primary EOF to meet the habitability requirements or establish an EOF between 10 and 20 miles of the plant site. The problem with staffing a near-site EOF can be overcome by providing helicopter transportation for the key EOF staff. These individuals can operate the EOF with a manpower augmentation from the Oconee Station until the remainder of the EOF staff arrives using other means of transportation.

Recommendation: That the Commission agree with the proposed staff disapproval of the Duke Power Company's request to establish the Oconee EOF in its General Offices in Charlotte, North Carolina, 125 miles from the plant site as an exception to the distance requirement in Table 1 of Supplement 1 to NUREG-0737.

Note: The staff intends to disapprove the licensee's request for an exception to the distance requirement for EOF locations within 10 working days of the date this paper is received by the Secretary unless otherwise instructed by the Commission. A proposed draft letter to be sent to the Duke Power Company is enclosed (Enclosure 5).

William J. Dircks
Executive Director for Operations

Enclosures:
1. Ltr. from Duke Power dtd. 6/1/81
2. " " " " " 12/3/82
3. " " " " " 6/3/83
4. " " " " " 10/25/83
5. Draft ltr. to Duke Power

SECY NOTE: In the absence of instructions to the contrary, SECY will notify the staff on Friday, March 2, that the Commission, by negative consent, assents to the action proposed in this paper.