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August 7, 2000

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

LaSalle County Station, Units 1 and 2
Facility Operating License Nos. NPF-11 and NPF-18
NRC Docket Nos. 50-373 and 50-374

Subject: Submittal of Changes to Emergency Plan Implementing
Procedure

In accordance with 10 CFR 50, Appendix E, "Emergency Planning Preparedness for Production and Utilization Facilities," we are reporting to the NRC changes to our Emergency Plan Implementing Procedures (EPIPs) within the requested 30 days pursuant to Section V, "Implementing Procedures." These changes were made July 7, 2000.

Attachment 1, "Summary of Changes," contains a brief summary of the EPIP changes. Attachment 2, "Implementing Procedure," contains the revised EPIP.

Should you have any questions concerning this letter, please contact Mr. Frank A. Spangenberg, III, Regulatory Assurance Manager, at (815) 357-6761, extension 2383.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles G. Pardee", is written over a horizontal line.

Charles G. Pardee
Site Vice President
LaSalle County Station

Attachment

cc: Regional Administrator - NRC Region III
NRC Senior Resident Inspector - LaSalle County Station

A045

Attachment 1
Summary of Changes

LZP-1530-1, "Exercises and Drills"

Description of Change(s):

1. 10 CFR 50 Appendix E reference added.
2. Under the section entitled "Technical Specification References," it was indicated that there are no Improved Technical Specification references applicable to procedure LZP-1530-1.

Purpose of Change(s):

1. 10 CFR 50 Appendix E is entitled, "Emergency Planning and Preparedness for Production and Utilization Facilities." The reference was added because some requirements in this procedure are based on this regulation.
2. With the implementation of Improved Technical Specifications in Spring 2001, ensure that the procedure reflects the most current Technical Specification references.

Attachment 2
Implementing Procedure

LZP-1530-1, "Exercises and Drills"

EXERCISES AND DRILLS

A. PURPOSE

The purpose of this procedure is to ensure station personnel and necessary outside agencies are periodically tested on all phases of GSEP.

B. REFERENCES

1. Generating Station Emergency Plan.
2. Procedures:
 - a) LZP-1510-1, GSEP Organizational Preparedness.
 - b) LAP-810-3, Station Records.
3. A.I.R. 1-83-32105, Drill and Exercise Records.
4. 10 CFR 50 Appendix E

C. PREREQUISITES

1. The Training Department should be notified of all drills and exercises. (Appraisal Improvement Item NRC Inspection Report 50-373/81-14 and 50-374-81-9).
2. The Station Quality Programs Department should be notified of all drills and exercises for audit purposes.

D. PRECAUTIONS

1. None.

E. LIMITATIONS AND ACTIONS

1. An annual exercise shall be conducted. Once every two years Federal, State and local organizations will be invited to participate.
2. Selection of participants, controllers and evaluators should be done as far in advance of the drill or exercise as possible. At a minimum a briefing should be held prior to the drill or exercise to cover the ground rules and the role of everyone involved.

F. PROCEDURE

1. Exercises

- a. The Nuclear Regulatory Services Manager shall ensure that Federally prescribed exercises are conducted at each nuclear station in order to test the adequacy of timing and content of implementing procedures and methods; to test emergency equipment and communication networks; and to ensure that emergency personnel are familiar with their duties. An exercise shall involve participation by Federal, State and local personnel as prescribed by the regulations.
- b. A written scenario shall be prepared for each exercise. This scenario shall include:
 - 1) The basic objective of the exercise.
 - 2) The dates, time period, places, and participating organizations.
 - 3) The simulated events.
 - 4) The time schedule of real and simulated initiating events.
 - 5) A narrative summary describing the conduct of the exercise to include such things as simulated casualties, rescue of personnel, deployment of radiological monitoring teams, and public information activities; and
 - 6) Arrangements for qualified observers.
- c. A critique shall be conducted as soon as practical after each exercise. The critique shall evaluate the ability of the GSEP organization to respond to a simulated emergency situation as called for in the GSEP.

2. Pre-Exercise Drills

- a. The Emergency Preparedness Supervisor shall ensure that preparations and training for the Federally prescribed exercises are accomplished through a Pre-Exercise drill. The Pre-Exercise will be written and conducted in the same manner described above for the Exercise. The purpose of the Pre-Exercise is to find areas with problems and weaknesses which can be corrected before the evaluated Exercise is conducted. The Pre-Exercise is a training and experience tool for the participants to sharpen awareness and practice skills necessary to accomplish specific Emergency Plan duties and responsibilities.
- b. A Pre-Exercise Findings Report shall be generated and presented to the Station within a few days after conducting the Pre-Exercise. The Findings Report will evaluate the ability of the GSEP organization to respond to a simulated emergency situation. This report will also contain Corrective Action and Suggested Improvement Items which will assist the Station in preparation for the evaluated Exercise. Corrective Actions identified in this report require response prior to conduct of the evaluated Exercise.

3. Communications Drills

- a. Monthly
 - 1) The capability of the Nuclear Accident Reporting System (NARS) to notify the Illinois Emergency Management Agency, the Illinois Department of Nuclear Safety, and appropriate local agencies shall be demonstrated. Also, the capability to notify the NRC from the Control Room, and TSC shall be demonstrated using the Emergency Notification System (ENS). The Health Physics Network (HPN) is tested using phones in the TSC. (LZP-1550-12, GSEP Communication Systems Monthly Operability Checks).
- b. Annually
 - 1) The emergency communications systems outlined in Section 7.0 of the Generating Stations Emergency Plan shall be fully tested.

4. Fire Drills

- a. Fire drills shall be conducted in accordance with LAP-900-17, Fire Drills.

5. Environmental Monitoring Drills

- a. Plant environs and radiological monitoring drills shall be conducted annually. These drills should include collection and analysis of sample media such as water, grass, soil, and air.

6. Health Physics Drills

- a. Health Physics Drill shall be conducted annually. These drills shall include response to, and analysis of, simulated airborne and liquid samples within the plant.
- b. High Rad Sample System Drill shall be conducted annually. Analysis of in plant liquid samples with actual elevated radiation levels shall be included. (Elevated means above background.)

7. Medical Emergency Drills

- a. A medical emergency drill, involving a simulated contaminated individual, and containing provisions for participation by local support services organizations (i.e., ambulance and support hospital) shall be conducted annually. Local support service organizations, which support more than one station, shall only be required to participate once each calendar year. The medical drill may be performed as part of the required annual exercise.

8. Assembly and Accountability Drills

- a. An assembly and accountability drill shall be conducted annually. The drill shall include identifying the locations of all individuals within the protected area after an assembly is announced. Successful demonstration of assembly and accountability as a part of the Annual Exercise shall serve as the successful completion of this drill requirement in that calendar year.

9. Offshift Station Augmentation Drill

- a. The Station shall initiate an unannounced offshift notification drill semi-annually. These drills shall involve implementation of the individual station's notification procedure and documentation of the times at which persons are notified. No actual travel is required. Participants give an estimation of their travel time to the drill location. This drill shall serve to demonstrate the capability to augment the onshift staff in a short period after declaration of an emergency.

10. Drill and Exercise Records (AIR 01-83-32105)

- a. Critique reports of drills and exercises will be reviewed, as appropriate, for recommendations of corrective action and program upgrade.
- b. Any Corrective Action or program upgrade performed will be documented on the Nuclear Tracking system in accordance with NSP-AP-1-12, "Action Tracking Management Program".
- c. Critique reports of GSEP drills and exercises will be retained in the Health Physics office and/or Central File in accordance with the LaSalle Master Record Retention Schedule.
- d. The GSEP Coordinator will provide records of GSEP Drill and Exercise participation to the Station Training Department for documentation.

G. CHECKLISTS

1. None.

H. TECHNICAL SPECIFICATION REFERENCES

1. CTS Section 6.2.A.d
(ITS None)
2. CTS Section 6.2.E
(ITS None)