

**Commonwealth Edison**

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*DMB*  
*Emergency Preparedness Appraisal*



August 6, 1981

Mr. James G. Keppler, Director  
 Directorate of Inspection and  
 Enforcement - Region III  
 U.S. Nuclear Regulatory Commission  
 799 Roosevelt Road  
 Glen Ellyn, IL 60137

PRINCIPAL STAFF	
✓ DIR	EGIS
D/D	PAO
A/D	SLO
DR&PI	
DE&TI	
✓ DE&OS	FL- X

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Subject: LaSalle County Station Units 1 and 2  
 Emergency Preparedness Appraisal  
 Response to Notice of Apparent Deficiency  
 NRC Docket Nos. 50-373/374

Reference (1): J. G. Keppler letter to Cordell Reed dated  
 June 11, 1981

Dear Mr. Keppler:

The purpose of this letter is to reaffirm the commitment of Commonwealth Edison Company to address the list of Significant Findings identified during the site Appraisal of LaSalle County Station, as documented in Reference (1). Enclosed is a tabulation of the Expected Completion Dates (ECD) for each of the significant findings identified in Appendix A. Also enclosed is a summary of our review of the other NRC Staff recommendations and observations delineated in Appendices B and C of Reference (1), including a discussion of expected completion dates for these items as well.

As can be seen the majority of the action items in Appendix A are either complete or nearing completion. An effort is being made to expedite the completion of items 8 (10/01/81) and 9 (11/01/81), both of which involve meteorological program hardware/software augmentation. These two items will be complete prior to the scheduled fuel loading of Unit 1 on December 1, 1981 and should not, therefore, hinder earlier consideration of operating license issuance. With the exception of item 17, which is scheduled for completion by 9/15/81, all other items will be in a form available for NRC review after September 1, 1981. It is requested that a follow-up audit, if required, be scheduled as soon as possible after September 1.

We will advise you as soon as possible of any improvement in these schedules. Hopefully, your planned audit of our progress can then be expedited. With respect to those items for which our action is now complete, we are available to assist you with a

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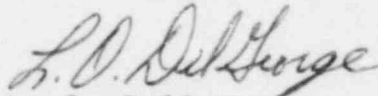
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re-audit at your earliest convenience.

To the best of my knowledge and belief, the statements contained herein and in the attachments are true and correct. In some respects, these statements are not based upon my personal knowledge but upon information furnished by other Commonwealth Edison employees. Such information has been reviewed in accordance with Company practice and I believe it to be reliable.

If you have any further questions in this regard, please direct them to this office.

Very truly yours,



L. O. DelGeorge

Director of Nuclear Licensing

cc: NRC Resident Inspector - LSCS

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OPEN ITEM #1 Expected Completion Date (ECD) 08/03/81  
OPEN ITEM #2 ECD 08/03/81

OPEN ITEM #3 As was discussed at the audit exit meeting on May 1, 1981, the requested revision to LGA-3 has been reviewed by the BWR Owners Group responsible for the development and human factors review of the symptom based emergency procedures. Although it is still judged to be unacceptable to modify this procedure (LGA-3) which has been accepted by the NRC Staff (Mr. D. Beck), a new emergency procedure will be prepared to address the cross-reference concern expressed by the NRC at this audit. A draft of this procedure will be available for review 09/01/81.

OPEN ITEM #4 ECD 08/03/81

OPEN ITEM #5 ECD 08/03/81

OPEN ITEM #6 ECD 09/01/81

OPEN ITEM #7 ECD 09/01/81

OPEN ITEM #8 ECD 10/01/81

OPEN ITEM #9 Meteorological informatin will be available on the process computer and as such chart recorders in the control room are not needed. ECD 11/01/81. This approach was reviewed by the Office of Nuclear Reactor Regulation (NRR) and was accepted. It is currently documented in the FSAR. This approach is preferable from a human factors standpoint in as much as the computer display is integrated into the Off Site Dose Calculation System in use at the plant.

OPEN ITEM #10 The LSCS meteorological tower has had its signals separated into primary and backup systems. No independent backup facility is judged necessary. In the event a meteorological tower collapses, a contract is maintained such that a temporary tower will be erected within 72 hours. For further information on backup meteorological facilities see the report submitted on June 1, 1981 in a letter from J. S. Abel to D. G. Eisenhut (Table D.5).

OPEN ITEM #11 ECD 09/01/81. Draft procedures available for NRC review.

OPEN ITEM #12 ECD 08/03/81

OPEN ITEM #13 ECD 08/03/81

OPEN ITEM #14 ECD 08/03/81 (also note that the procedure number is L郑-1360-1 not L郑-350-1)

OPEN ITEM #15 ECD 09/01/81. Draft procedures available for NRC review.

OPEN ITEM #16 ECD 09/01/81. Draft procedures available for NRC review.  
OPEN ITEM #17 ECD 09/15/81  
OPEN ITEM #18 Training program has been developed.  
OPEN ITEM #19 The current training program trains emergency organization personnel to fulfill eleven basic objectives. This program and its objectives will be reevaluated to ensure adequacy by 09/01/81. Retraining if required will be completed by 10/01/81.

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Appendix B

Appraisal Improvement Items

- AII #1 We judge this not to be a responsibility of the Quality Assurance Department. QAD will audit the implementation of GSEP, including the training area. However, the effectiveness of training is determined through evaluations by Nuclear Stations Division of the demonstrated proficiency of GSEP personnel during exercises and drills.
- AII #2 Present policy for all CECO. Stations is to have only one duty-call personnel - the Operations Director. The Operations Director will initiate the notification procedures to man the TSC. We judge that our augmentation capability satisfactorily meets the intent of NUREG 0654-Table B-1.
- AII #3 Will do within one year of fuel load; whose estimated latest date is 12/01/81
- AII #4 ECD 08/03/81
- AII #5 Additional brochures have been distributed to the transient population locations.
- AII #6 For Station Personnel ECD 09/01/81; Offsite Personnel as communicators are trained via participation in drills and exercises. No additional formal training is judged necessary.
- AII #7 ECD 10/01/81
- AII #8 ECD 08/03/81
- AII #9 ECD 12/31/81
- AII #10 ECD 08/03/81
- AII #11 ECD 08/03/81
- AII #12 ECD 09/01/81
- AII #13 ECD 12/31/81
- AII #14 ECD 12/31/81
- AII #15 ECD 12/31/81
- AII #16 ECD 12/31/81
- AII #17 Completed
- AII #18 Being reviewed by human factors personnel at Station.
- AII #19 ECD 09/01/81
- AII #20 ECD 10/01/81
- AII #21 Completed
- AII #22 ECD 10/01/81
- AII #23 ECD 10/01/81
- AII #24 ECD 10/15/81
- AII #25 ECD is 30 days before fuel load; the currently estimated ECD is 10/01/81
- AII #26 We have agreements with NW Memorial Hospital in Chicago to serve as the backup hospital for treating contaminated, injured persons. We do not feel that backup local hospital agreements are necessary. During annual training at the hospitals, the staffs are trained to expand existing facilities and handle multiple contaminated injuries on the triage basis
- AII #27 ECD 12/31/81
- AII #28 Since station procedures are not appropriate for use by outside agencies, we will not issue station procedures to Grand Ridge Fire Department. The CECO. GSEP would not be of significant benefit to the Fire Department. The State's IPRA for LSCS would be more appropriate.

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Appraisal Improvement Items (Continued....)

AII #29 Completed

AII #30 Completed

AII #31 The Station's telephone directory will be updated quarterly per GSEP.

AII #32 ECD: The October '81 edition of the directory

AII #33 ECD 08/03/81

AII #34 Completed

AII #35 LZP-1330-6 will be deleted from Station procedures. ECD 08/03/81

AII #36 & #37

These items are part of the equipment needs currently being evaluated for inclusion in the 1982 capital budget. At this time, a final decision is not available.

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Appendix C \*

<u>OPEN ITEM #20</u>	ECD 10/01/81
<u>OPEN ITEM #21</u>	ECD 10/01/82
<u>OPEN ITEM #22</u>	ECD 10/01/81
<u>OPEN ITEM #23</u>	ECD 10/01/81
<u>OPEN ITEM #24</u>	ECD 10/01/81. However, calibration over the full instrument range is still being investigated.
<u>OPEN ITEM #25</u>	ECD 09/01/81
<u>OPEN ITEM #26</u>	ECD 10/01/81 for pre-calibration. Actual date of calibration is subject to operation of plant and the release of effluents.
<u>OPEN ITEM #27</u>	ECD 11/01/81
<u>OPEN ITEM #28</u>	ECD for portable MCA is 01/01/82 ECD for post-accident sampling systems is 10/01/81
<u>OPEN ITEM #29</u>	ECD is 30 days before fuel load; the currently estimated ECD is 10/01/81
<u>OPEN ITEM #30</u>	ECD 12/01/81
<u>OPEN ITEM #31</u>	ECD 10/01/81

\* These dates indicate anticipated operating dates; however, exact dates are subject to equipment installation schedules.

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