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June 11, 1984

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

Subject: Byron Generating Station Units 1 and 2
Emergency Preparedness Appraisal
I&E Inspection Report Nos. 50-454/83-56
and 50-455/83-39

Reference (a): February 3, 1984 letter from C. J. Paperiello to Cordell Reed.

Dear Mr. Keppler:

This is to provide Commonwealth Edison's response to the open items and improvement items which were identified during the Byron emergency appraisal.

Attachments A and B to this letter contain the responses to the open items and improvement items, respectively, listed in reference (a). As you will see, only a few actions remain to be taken to address the NRC's concerns.

Please address further questions regarding this matter to this office.

Very truly yours,

D. L. Farrar
Director of Nuclear Licensing

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ATTACHMENT A

RESPONSES TO OPEN ITEMS

OPEN ITEM #1

Develop and implement an augmentation or staffing procedure to ensure that the Corporate Command Center (CCC) and/or the Emergency Operations Facility (EOF) will be fully staffed in a timely manner, e.g., one hour for the EOF being operational. This procedure could be a call tree type similar to that used by the station for off-shift augmentation. This must be completed prior to initial criticality (454/83-56-01; 455/83-39-01).

RESPONSE

The corporate Generating Station Emergency Plan (GSEP) manual has been revised to describe the method by which both the CCC and/or EOF shall be so activated as well as the mechanism by which specific responsible individuals are contacted to activate the ERF's. The GSEP phone directory does identify sufficient individuals to staff the ERF's (CCC and EOF).

The GSEP phone directory was revised in January of 1984 to include prioritized EOF director positions versus people by station. These lists were based upon the home geographic location and the ability to report to a specific EOF in a timely manner.

The April, 1984 revision of the GSEP phone directory has a call out tree for use during non business hours. This call out tree shall apply to EOF and CCC directors.

With these changes it is reasonable to expect partial manning of the EOF or CCC within 60 minutes for site and general emergencies.

OPEN ITEM #2

Update procedure BZP 600-A1 to incorporate current emergency response assignments such that those closest to the station are notified first; and provide a copy of the completed and revised procedure to all personnel responsible for implementing it such that a copy of this procedure will be available near the callers' home telephone. This must be completed prior to fuel load. (454/83-56-02; 455/83-39-02)

RESPONSE

Byron procedure BZP 600-A1 has been revised and approved to incorporate current job assignments and distances from the plant. The procedure directs that people living closest to the plant should be called first. An "information only" copy of the procedure will be given to the call supervisors.

OPEN ITEM #3

Complete the Technical Support Center (TSC) by making the ventilation system and its associated radiation monitoring system operable and include a copy of the Final Safety Analysis Report (FSAR) and Technical Specifications in the TSC working area. This must be completed prior to initial criticality. (454/83-56-03; 455/83-39-03)

RESPONSE

Testing of this ventilation system for the TSC has been completed. Installation of the HEPA and charcoal filters is complete. The TSC ventilation system is operational.

The radiation monitoring systems are operational with the exception of the continuous air monitor (CAM). The CAM will be tested and operational prior to initial criticality.

A copy of the Final Safety Analysis Report and the Technical Specifications have been placed in the Technical Support Center.

OPEN ITEM #4

Complete installation, development of procedures, and training on the use of the Post Accident Containment Atmosphere Sampling System and the methods for analyzing this sample. This must be completed prior to exceeding 5% power. (454/83-56-04; 455/83-39-04)

RESPONSE

Completion of the containment air sampling panel, bendix gas chromatograph and the gas partitioner as well the associated training and demonstration of sampling capability within 1 hour will be completed prior to fuel load.

OPEN ITEM #5

Complete installation, development of procedures, and training on the use of the General Atomics Wide Range Gas Monitors and methods for analyzing the corresponding particulate, gas, and radioiodine cartridge samples. Specific attention must be paid as to how the lead shielding cask will be transported from the sample location to the counting facility. This must be completed prior to fuel load. (454/83-56-05; 455/83-39-05)

RESPONSE

A functional evaluation of the revised procedures for use with the wide range gas monitors has been performed and all radiation chemistry technicians have been trained. Approval of the revision to Procedure BZP-380-3 is complete. Specific attention has been given to transporting the lead shielding cask in this procedure revision.

OPEN ITEM #6

Complete installation, development of procedures, and training on the use of the General Atomics station blowdown monitor and sampler. This must be completed prior to fuel load. (454/83-56-06; 455/83-39-06)

RESPONSE

Procedure BZP-380-4 has been revised and approved. Training and pre-operational testing has been completed. Additionally, sample collection points have been modified to direct the sample downward.

OPEN ITEM #7

Complete construction, installation, and stocking of equipment, supplies and instrumentation in the medical treatment and decontamination facility. This must be completed prior to fuel load. (454/83-56-07; 455/83-39-07)

RESPONSE

Construction and stocking of the required equipment is complete.

OPEN ITEM #8

Complete calibration and installation of the containment high range monitor, General Atomics RM-11 System, and all other process or area radiation monitors used for emergency classifications or accident assessment. This must be completed prior to fuel load (454/83-56-08; 455/83-39-08)

RESPONSE

All area radiation monitors used for emergency classifications or accident assessment will have approval of pre-operational test results by fuel load. The approval of pre-operational test results for all process radiation monitors used for emergency classifications or accident assessment will be completed prior to fuel load. The area and process detectors are currently calibrated and will be recalibrated at refueling outages.

OPEN ITEM #9

Complete installation of non-radiological process monitors used for emergency classifications or accident assessment. This must be completed prior to fuel load. (454/83-56-09; 455/83-39-09)

RESPONSE

The test results for the containment hydrogen monitors, ionization detectors and seismic monitors are ready for NRC review. Testing of the annunciator windows and analog control room indicators for the Containment hydrogen monitors is not complete and is listed as an open item in the test.

OPEN ITEM #10

Complete installation of respiratory protection equipment, such as the Self Contained Breathing Apparatus (SCBAs) in the Control Room, TSC, OSC, outside of Unit 1 and 2 containments, at the remote shutdown panels, and the rad/chem area of the Auxiliary Building. This must be completed prior to fuel load. (454/83-56-10; 455/83-39-10)

RESPONSE

All SCBA's are now in place.

OPEN ITEM #11

Develop a procedure for the Acting Station Director (Shift Engineer). This procedure must include all responsibilities that the Shift Engineer would perform, such as event classification, appropriate notifications, on-hours and off-hours augmentation, a streamlined flow chart for protective action decision making, how to fill out the Nuclear Accident Reporting System (NARS) form, guidance on which tasks Rad/Chem Technicians (RCTs) should perform and in what order, and the sounding of the assembly/evacuation alarm for any Site Area or General Emergency. This procedure should not contain any extraneous information that is not needed by the Shift Engineer to implement his responsibilities. Training of all potential Acting System Directors must be performed after the procedure is issued. This must be completed prior to fuel load. (454/83-56-11; 455/83-39/11)

RESPONSE

A procedure (BZP-310-5) for Acting Station Director has been written and reviewed by the appropriate operating department personnel who should perform the function of Acting Station Director. The procedure has been approved. Training of Acting Station Director candidates will occur before fuel load.

OPEN ITEM #12

Complete installation, testing, and calibration of the associated equipment and completion of procedures for the use and operability of the computerized "Class A" model. This must be completed prior to exceeding 5% power. (454/83-56-12; 455/83-39-12)

RESPONSE

In lieu of the interface for the Westinghouse and General Atomics computers, procedure BZP 320-2 was written. This procedure will allow manual entry of "A Model" monitoring data into the plant process computer as it is recorded from the RM-11 computer console. This procedure will be used as an interim measure until a data link between the RM-11 console and the plant process computer can be established. Procedure BZP 320-2 will also be used in the event of a data link failure.

Also, in order to clarify statements made in Inspection Report 83-56 as to the operation of the "A Model" and it associated equipment the following statements are made.

The control room SPDS will consist of two iconic displays to fulfill the requirements of NUREG 0696, but will not be used for point status or point trending, as stated under 5.4.2 of the assessment actions. The SPDS in the TSC and EOF will be operational to pull both point status and point trending as stated.

GSEP classifications and protective action recommendations will not be produced at the RM-11 consoles in the control rooms. GSEP classifications will be output on the process computer alarm typer in the control room. Also, no alarm will sound if an emergency classification has been exceeded, as stated.

The SPDS will be operational by commercial service. Completion of the data link between the RM-11 consoles and the plant process computers remains to be completed. This activity is scheduled to be completed by October 15, 1984.

Procedure BZP 320-2 has been approved.

OPEN ITEM #13

Develop a procedure to determine radioiodine concentrations in the field as low as 1E-07 uCi/cc for the equipment currently available to field teams. This must be completed prior to exceeding 5% power. (454/83-56-13; 455/83-39-13)

RESPONSE

All SAM-2 electronics are now operational. Procedures BRP 1740-2 and BRP 1740-3 have been revised and approved for the SAM-2.

OPEN ITEM #14

Develop and implement communication check procedures. This must be completed prior to fuel load. (454/83-56-14; 455/83-39-14)

RESPONSE

Recently approved procedures BZP 500-1 and BZP 500-T1 now perform a monthly communications check.

OPEN ITEM #15

Complete installation of the Sentry High Radiation Sampling System (HRSS) primary coolant sampling capability for Unit 2. (455/83-39-15)

RESPONSE

The Unit-2 HRSS is to be operational prior to fuel load on Unit 2.

ATTACHMENT B

RESPONSES TO IMPROVEMENT ITEMS

IMPROVEMENT ITEM #1

The Stores Diretor's binder in the Technical Support Center (TSC) should contain as complete and as current information regarding health physics and vendor contacts for these supplies as are on file in the Stores Supervisor's Office.

RESPONSE

Procedure BZP 600-A2 has been revised and approved to now include the Stores Director's updated list of vendor contacts.

IMPROVEMENT ITEM #2

A copy of the technical specifications should be on file in the Emergency Operations Facility (EOF).

RESPONSE

A Proof and Review copy of the Technical Specifications is now at the EOF.

IMPROVEMENT ITEM #3

The health physics storage area should contain an appropriate check source.

RESPONSE

A non-licensed check source has been provided to perform response testing by initial criticality.

IMPROVEMENT ITEM #4

The GSEP kit used by the security force should be more readily accessible to the team dispatched to the EOF and should contain a route map to the EOF, instructions regarding when and how the team should contact plant security, and a current roster of persons allowed EOF access.

RESPONSE

The GSEP kit used by the security force has been relocated to be more readily accessible to the security force and will be equipped with associated maps and rosters as stated in the BZP's. These actions will be completed prior to fuel load when full security is implemented.

IMPROVEMENT ITEM #5

Procedure CC-1 should be revised to list the locations of the Byron Station's TSC, Operational Support Center (OSC), and EOF in Attachment D, and the appropriate two digit Nuclear Accident Reporting System (NARS) codes for Byron in Attachment E.

RESPONSE

The new revision of Procedure CC-1, Revision 9, Attachment E, contains the locations of the OSC, TSC and EOF. Attachment D contains the appropriate NARS dial code for Byron Station.

IMPROVEMENT ITEM #6

The three-foot reach rod should be stored in the High Radiation Sampling System cabinet.

RESPONSE

The reach rod is stored in a cabinet next to the High Radiation Sampling System cabinet.

IMPROVEMENT ITEM #7

Instruments for analysis of chloride and dissolved hydrogen should be made operational and performance tested.

RESPONSE

All instruments have been installed and calibrated. Procedures, preoperational tests and RCT training will be completed by initial criticality.

IMPROVMENT ITEM #8

Evacuation route designations (arrows) delineating directions to the assembly areas should be installed.

RESPONSE

Evacuation route delineation arrow installation will be completed by initial criticality.

IMPROVEMENT ITEM #9

The emergency lighting in the Maintenance Shop and the Unit 1 turbine building trackway assembly areas should be improved.

RESPONSE

Emergency lighting in the maintenance shop and the Unit 1 turbine building trackway assembly area will be improved prior to initial criticality.

IMPROVEMENT ITEM #10

Procedure EOF-4 should be revised to provide the correct locations for Byron Station's Emergency News center (ENC) and any alternate locations.

RESPONSE

The location of Byron Station's Emergency News Center and any alternate locations will be included in the next revision to EOF-4 by September, 1984.

IMPROVEMENT ITEM #11

Additional briefing aids, such as less complex and/or larger-scale drawings of major plant systems and key components, should be available at the ENC.

RESPONSE

All aspects of design and equiping of the various CECo JPIC facilities are being reviewed to assure that an effective public information effort can be supported. This project is to be completed by April 1, 1985. In the interim, additional poster diagrams depicting plant arrangement and key plant systems will be provided by September 1, 1984.

IMPROVEMENT ITEM #12

The cart containing the support hospital supplies should be locked and sealed until needed and inventoried whenever the seal is found broken.

RESPONSE

The cart containing the support hospital supplies will be locked, sealed and inventoried quarterly, or upon receipt of notification that the seal integrity is violated as per procedure BZP 500-T9.

IMPROVEMENT ITEM #13

The Eberline Survey Assay Meter (SAM-2) instruments should be returned to the field monitoring emergency kits, or an alternative method of measuring airborne radioiodine in the field must be developed.

RESPONSE

The SAM-2 instruments have been returned to the field monitoring emergency kits. The kits are located in the guardhouse.

IMPROVEMENT ITEM #14

The "A Model's" meteorlogical data quality control tests should be refined to better assure that obviously invalid parameter values, which do not exceed sensor performance limits, are readily identifiable to persons involved in dose assessment activities within the TSC, EOF, or Corporate Command Center (CCC).

RESPONSE

The "A Model" program print out has been designed to supply rapid basic release rate information dose projections and affected sectors as well as a printout of the last 12 hours of meteorological data. The program print out was designed for individuals who are not trained meteorologists. The meteorological portion of the "A Model" has been verified to the design intent of the CECo "A Model" criteria. Additional manipulation of meteorological data to find proposed invalid parameters within sensor performance limits is not appropriate for inclusion within the "A Model" logic.

Checks of the operability of meteorological equipment are made independently of the "A Model" at regular intervals. Weekly checks of meteorological equipment are performed by Byron Rad-Chem Technicians to verify that control room and tower readings coincide. Additionally, the sensors are checked for proper operation by Murray and Trettle, consulting meteorologists, on a weekly basis independent of the Rad Chem system check. Repairs are made as required at this time by Murray and Trettle. Calibrations are performed by Murray and Trettle on a bi-monthly basis.

Meteorological readings are taken at CECo's downtown office for all Nuclear Generating stations on a continuous basis. If a value falls outside of sensor range or does not change for four hours an investigation is initiated. Murray and Trettle interrogates the Byron Microtel 3 times a day and checks the data for validity.

IMPROVEMENT ITEM #15

The applicant should acquire an appropriate dedicated vehicle and/or implement a system to ensure that an appropriate number and type of station vehicles will be immediately available for use by field monitoring teams.

RESPONSE

Byron Station has several vehicles. A list of available vehicles is kept by the Shift Engineer. Further, Byron Station will share a dedicated vehicle with Quad Cities Station. Implementation will occur by initial criticality.

IMPROVEMENT ITEM #16

The implementing procedure format should be modified to accommodate a section for "precautions." All procedural precautions should be identified in the early stages of each procedure.

RESPONSE

Precautions are included in the implementing procedures at points in the procedure where the precautions are applicable. This format is copied from the format used at Dresden Station. The NRC praised this format during a GSEP evaluation there. No revisions to existing procedures to incorporate this concern are planned.

IMPROVEMENT ITEM #17

Station Group Director's checklists should be revised to include references to the appropriate BZP procedures used to implement specific functions.

RESPONSE

The Group Director's checklists will be updated to include references to the appropriate BZP's. The checklist will be reviewed the appropriate directors and approved by initial criticality.

IMPROVEMENT ITEM #18

All implementing procedures should be reviewed to ensure that all action steps are provided with guidance on "how" to do the step and "who" is responsible for its accomplishment. Procedures should be detailed aids which accomplish more than reminding the responsible party of what his job entails.

RESPONSE

Station direction procedures and checklists will be reviewed and revised as necessary to include applicable references by initial criticality.

IMPROVEMENT ITEM #19

As emergency procedures, contingency action procedures, functional restoration procedures, and abnormal procedures, are revised the precautionary note should be changed to make reference to EAP 200-A1 (Emergency Action Levels) as opposed to Table BYA 5-1 of the annex in all procedures. This will add consistency and eliminate potential confusion.

RESPONSE

Byron BEP's, BFR's, BOA's and BCA"s have been revised to reference BAP-200-A1 instead of Table BYA 5-1.

IMPROVEMENT ITEM #20

Clarify the policy on the Shift Engineer's ability to delegate NARS form completion.

RESPONSE

The procedure delineating the Shift Engineers ability to delegate the NARS form will be revised to clarify the policy about delegating the NARS form completion. This procedure will be offered as part of Annual Re-training for all Acting Station Directors after approval of the Acting Station Directors Procedure.

IMPROVEMENT ITEM #21

The GSEP responses in BZP 310-1 for the Alert and Site Emergency should read the same as described in the GSEP response for the General Emergency, namely, the Station Director should be aware that if the CCC or EOF is activated, then the information contained in the completed NARS Form must be conveyed to the CCC Director or Recovery Manager.

RESPONSE

Procedure BZP 310-1 will be updated to reflect this recommendation by initial criticality.

IMPROVEMENT ITEM #22

Section III.B.3 of BZP 100-T1 should list the phone numbers of the Federal and local services support agencies.

RESPONSE

Procedure BZP 100-T1 will be updated to include a reference to the BZP which contains all federal and local service phone numbers. This action will be completed by initial criticality.

IMPROVEMENT ITEM #23

A manual and computerized Environmental Director (ED) series procedure should be developed for determining the offsite consequences of a steam generato tube rupture event.

RESPONSE

The need for a manual procedure and computerized Environmental Director (ED) series procedure regarding the offsite consequences of a steam generator tube rupture event is being evaluated; however, its future has not yet been determined.

IMPROVEMENT ITEM #24

A summary table of relevant conversion factors (such as gallons per minute to cubic feet per minute and miles per hour to meters per second) should be provided in the ED procedures binders.

RESPONSE

During the 1984 review of the ED procedures the addition of a conversion factor table will be considered. Needless conversion tables that would lead to confusion of the reader will not be included. Equations within the ED procedures are designed to include the needed conversions. This eliminates the need of the reader to convert (for example - gallons per minute to cubic feet per second) before the value can be entered into the equation.

IMPROVEMENT ITEM #25

Section C.1.b of BZP 380-10 should be expanded to include information on specific portable air samplers, continuous air monitors, sampling media, etc.

RESPONSE

Generic procedure BRP 1740-1 was developed for addressing sampling equipment and sampling media for use in accident conditions. This procedure is believed to be adequate for addressing NRC concerns and therefore does not need to be included in procedure BZP 380-10.

IMPROVEMENT ITEM #26

Procedures BZP 380-11, 380-12 and 380-16 should be revised to include the following: valve and control identification in the procedure should be identical to valve and control labels on the sampling panel; add a step in the procedure to label the sample bottle before it is first inserted into the cask; and add a precaution to alert the operators to watch for small leaks of coolant from the fill station onto the cask and/or floor after the cask is removed.

RESPONSE

The procedures have been revised to address these comments.

IMPROVEMENT ITEM #27

Unlabeled valves and controls on the High Radiation Sampling System (HRSS) Liquid Sample Panel should be clearly labeled in accordance with the sampling procedures.

RESPONSE

Additional labeling has been added to the panel as recommended.

IMPROVEMENT ITEM #28

Procedures BZP 380-17 and BZP 380-A7 should be expanded to include transfer of post accident samples from the containment air sample panel, the stack effluent grab sampler, and the station blowdown monitor/sampler.

RESPONSE

The procedures have been expanded and approved.

IMPROVEMENT ITEM #29

Section C.2.c and C.2.d of procedure BZP 380-16 should be expanded to clearly identify the hardware, sample bottle sizes, and the sequence and nature of the manipulations.

RESPONSE

There are only two bottle sizes used. These bottles are located adjacent to the panel in a cabinet. Procedures governing use of this hardware are a part of the training program.

IMPROVEMENT ITEM #30

Procedures BCP 800-2 and BCP 800-3 should be functionally tested and verified when the pertinent equipment becomes operational.

RESPONSE

Procedure BCP 800-2 was functionally tested without problems. Procedure BCP 800-3 was functionally tested and required minor revisions. Revision to BCP 800-3 will be completed by initial criticality.

IMPROVEMENT ITEM #31

The references of procedure BZP 380-6 should be expanded to apply to all post accident samples that would be received by the Hot Chemistry Lab for sample preparation and analysis, and Section C.4 of this procedure should specify the use of a continuous air monitor to evaluate habitability.

RESPONSE

Procedure BZP 380-6 was expanded on December 7, 1983 to include these concerns.

IMPROVEMENT ITEM #32

Procedure BCP 800-8 should be expanded to include all post accident samples that may need dilution prior to analysis; Section F.1.a should provide detailed instructions for measuring the dose rates around the shielded and/or unshielded sample; and depending on the dose rate measurements, various methods and special handling tools for removing the sample container cap or otherwise extracting the diluting the sample should be specified.

RESPONSE

Procedure BCP 800-8 will be expanded by in..ial criticality.

IMPROVEMENT ITEM #33

Procedure BCP 800-1 should be revised as follows: valve and control identifications in the procedure should be identical to those on the sample panel; sections F.6 and F.8 should completely and correctly specify the valve alignments; sections F.7, F.8, F.9, and F.10 should correctly reference other steps in the procedure; movements between various panels should be clearly specified; and the data tables referenced in sections F.7.e. (7) and F.8.a (6) should be provided.

RESPONSE

Procedure BCP 800-1 is being revised. Revision will be complete by initial criticality.

IMPROVEMENT ITEM #34

BZP 100-T8 should be expanded to provide guidance for determining the priorities of actions RCTs should implement should a limited number of personnel be available.

RESPONSE

Procedure BZP 100-T8 will be revised to provide priority guidance by initial criticality.

IMPROVEMENT ITEM #35

An overall emergency radiation protection procedure should be developed which covers or references all actions necessary to implement the radiation protection program during accident conditions; e.g., respiratory protection, radiation exposure controls, exposure records, personnel dosimetry, priorities for assessment actions, decontamination limits, criteria for use of respirators and types to be worn, and criteria for use of protective clothing.

RESPONSE

The concerns of this item are covered under procedure BRP 1740-1. No further action is planned.

IMPROVEMENT ITEM #36

A prepared message should be available in the procedures for use when announcing assembly or evacuation on the plant paging system.

RESPONSE

A prepared message will be included in the procedures for use when announcing assembly or evacuation. Implementation will occur by initial criticality.

IMPROVEMENT ITEM #37

The evacuation siren should be periodically tested in order to familiarize plant workers with its sound.

RESPONSE

Testing of the evacuation siren, on a monthly basis, began on March 6, 1984. Prior to sounding the assembly/evacuation siren an announcement is made stating the siren is in test and that no assembly is required.

IMPROVEMENT ITEM #38

A separate Search and Rescue procedure should be prepared, which summarizes all aspects of conducting an onsite search and rescue operation, including team composition, team briefing the debriefing, and responsibility for team direction after dispatch.

RESPONSE

A separate search and rescue procedure is not necessary. The security force will have the last known location of the missing person. The radiation chemistry technicians are trained in first aid. When further search and rescue actions are undertaken through GSEP, they will be directed by the Station Director, with inputs from the Rad-Chem Director and the Security Director.

IMPROVEMENT ITEM #39

The site evacuation decontamination procedure, EG-10, should be referenced in BZP 310-4 and BRP 1470-1.

RESPONSE

Procedure EG-10 will be included in BZP 310-4 and BRP 1470-1 by initial criticality.

IMPROVEMENT ITEM #40

A copy of EG-10 should be placed in the Rock River Division Headquarters in Rockford, IL.

RESPONSE

A copy of EG-10 is in each field team's field kit. During an evacuation, a field team will be sent to the applicable relocation center to perform monitoring as required by EG-10.

IMPROVEMENT ITEM #41

BZP 380-2 should be revised to instruct the user to forward the completed BZP 380-T1 to the Rad/Chem Director.

RESPONSE

Procedure BZP 380-2 will be revised by initial criticality to instruct users to forward BZP 380-T1 to the Radiation Chemistry Department Director.

IMPROVEMENT ITEM #42

The contamination levels that require decontamination stated in BRP 1110-1 and BRP 1480-1 should be referenced in BRP 1470-1.

RESPONSE

Procedure BRP 1470-1 is being revised to reflect a standardized corporate procedure. This standardized procedure does not incorporate contamination limits but rather, the method to be used for decontamination. Additionally, all Radiaton Chemistry personnel are being issued wallet cards which summarize Byron Station radiological limits.

IMPROVEMENT ITEM #43

The contamination levels that require decontamination should be consistent between BRP 1110-1 and EG-10.

RESPONSE

Technical Services Nuclear Department has been informed of this discrepancy and will ammend personnel decontamination in EG-10 to match those in BRP 1110-1.

IMPROVEMENT ITEM #44

A procedure that provides guidance in the treatment of casualties during an emergency should be developed.

RESPONSE

Procedures BZP 380-6 and BZP 380-2 address emergency treatment of personnel. These procedures include priorities for first aid, treatment of shock, hemorrhage or life threatening conditions. These procedures also address actions to be taken if offsite medical attention is required.

All Radiation Chemistry Technicians are required to complete the National Red Cross mulimedia course in first aid as a part of their initiql training and are retrained on continuous basis. Actual treatment of casualties is determined by the type of injury and the experience and training of the person administering aid.

IMPROVEMENT ITEM #45

Develop a procedure for repair/corrective action activities to ensure that teams are briefed prior to dispatch into the plant on potential hazards, radiological considerations, and operations to be performed such that ALARA considerations are taken into account.

RESPONSE

An Operation Support Center Director Procedure is being developed to ensure team briefings. This procedure will be implemented prior to initial criticality.

IMPROVEMENT ITEM #46

Proposed procedure changes should be reviewed by personnel involved in their implementation to ensure that they are workable. Where a procedure affects the Shift Engineer, input from these personnel on the proposed change should be sought.

RESPONSE

Procedures affecting different departments are being given to all relevant departments for review.

IMPROVEMENT ITEM #47

The applicant should develop an audit procedure which will provide guidance on all emergency planning requirements and their location in the GSEP, Site Annex, and 10 CFR sections, and will include the current GSEP audit matrix. This procedure should be flexible enough to allow the auditor to use professional judgement in developing the audit questions.

RESPONSE

The auditing of GSEP functions does not differ substantively from that given in Quality Procedures 18-51 and 18-52. We do not feel that a separate procedure is warranted. However, in line with discussions with the Inspector, we agree that the present GSEP matrix, contained in Quality Assurance Department Memorandum #11, can be expanded in scope and depth to be more definitive. Therefore, Quality Assurance will prepare a revised table for incorporation in that Memorandum, identifying a broad coverage of the specific provisions to be covered in GSEP audits, including corporate program audits and audits or surveillances of drills and exercises. The guidance embodied in the current audit matrix will be included.

The matrix will be utilized in such a way that each matrixed item will be audited at least once within a three-calendar-year period; for unique items applicable to individual sites, this schedule will apply independently for each site. Corporate and generic items will meet a similar schedule. The new table will be available within 60 days following the release of Revision 4 of the corporate GSEP, and it is any event expected to be completed by 9/4/84.

IMPROVEMENT ITEM #48

Procedure BZP 400-2, step 4.d should be revised to assign the Health Physics Foreman in the OSC specific responsibility to maintain an up-to-date record of emergency personnel absorbed radiation dose.

RESPONSE

Procedure BZP 400-2 will be revised to ensure that an up to date dose record is maintained in the Operational Support Center. This program will be implemented by initial criticality.

IMPROVEMENT ITEM #49

All operators should participate in operator seminar training to trace all required Control Room operator actions from initial detection through emergency classification, notifications, to finally make protective action recommendations. This series of training seminars should be coupled with the required Acting Station Director procedural development.

RESPONSE

A procedure for the Acting Director has been written. This procedure is being studied by the licensed operators during the retraining week. This retraining week occurs on a 6-week cycle.