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Sinnissippi Alliance for the Environment
326 North Avon Street Rockford, Illinois 61103

'84 JUL -9 A10:27

Mr. Alan Bielawski
Isham, Lincoln & Beale
Suite 5200
Three First National Plaza
Chicago, Il. 60602

DOCKETING & SERVICE BRANCH

July 2, 1984

50-454
50-455

Re: Byron Station Stipulated Emergency Planning Commitments F, G, H, I, J, K, L, O, Y, and Z

Dear Alan:

In accordance with Section 4(d) of the Stipulation, dated March 30, 1983, signed by the parties to the Byron Operating License Proceedings, Intervenors DAARE/SAFE and the Rockford League of Women Voters hereby respond to Commonwealth Edison's notification to Intervenors, dated June 13, 1984, of Commonwealth Edison's belief that it has satisfied Commitments F, G, H, I, J, K, L, O, Y, and Z. Please find set forth in the attached pages Intervenors responses to each Commitment notification.

Very truly yours,

Patricia A. Morrison
on behalf of Rockford
League of Women Voters

Diane Chavez
legal representative,
DAARE/SAFE

cc: Judge Smith
Judge Callihan
Judge Cole
Richard Rawson
Jane Whicher
Paul Holmbeck
Erie Jones
Sheriff Brooks

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PDR ADOCK 05000454
Q PDR

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COMMITMENT F

Demonstrate that the transient population figures used in the study are representative of conditions which are likely to exist during an evacuation.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment F based on it's response letter dated June 13, 1984. The transiant population figures used in the study are not representative of conditions which are likely to exist during an evacuation. Many of the population figures are inaccurate and underestimate the transiant population at various sites. Further, the figures presented fail to adequately indicate the range of population at locations whose attendence varies greatly; seasonally and throughout the year. The figures presented minimize population at those locations by presenting low range figures. Additionally, some locations indicated figures presented were outdated by several years and that they have recieved no recent contact from Commonwealth Edison or the State of Illinois. Table 3-3, note one of the Time Estimate Study incorrectly implies that the data presented therein was taken in January 1984.

COMMITMENT G

Demonstrate that the principal assumptions used in developing the estimates are stated and defensible.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commitment G has been satisfied.

The following documents cited in Edison's response letter to support various assumptions have not been provided to Intervenors: "Evacuation Planning in Emergency Management," D.C. Heath and Company, 1981; "A Perspective on Disaster Planning," Russell R. Dynes, E.L. Quarantelli, Disaster Research Center, The Ohio State University and Gary A. Kreps, College of William and Mary, 1972; "Evacuation Risks-An Evaluation", EPA.

Moreover, said response letter is deficient on it's face to the extent that the statements cited as support for assumptions are not substantive support.

Intervenors are undergoing efforts to verify that all principal assumptions used in developing the estimates are stated and defensible.

COMMITMENT H

Demonstrate that specific recommendations for actions that could significatntly improve evacuation time have been considered where feasible, or that such consideration is not warranted.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commoitment G has been satisfied.

Intervenors have engaged an expert witness to evaluate and to conduct an independent assessment of the Time Estimate Study, and to analyze whether further specific recommendations are warranted.

COMMITMENT I

Demonstrate that comments with respect to the evacuation study from the principal emergency response organizations (Illinois ESDA and Ogle County ESDA) have been solicited and that the study takes these comments into consideration.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment I based on it's response letter dated June 13, 1984.

Commitment I requires three items to be accomplished in order to be satisfied.

First, Edison should demonstrate that comments with respect to the Time Estimate Study were solicited from Il. ESDA and Ogle County ESDA. Edison fails to have provided Intervenors with any direct evidence of said solicitation but has instead chosen to provide indirect evidence by way of identically worded letters from Il. ESDA and Ogle County ESDA, dated June 12, 1984 and June 11, 1984, respectively.

Secondly, Commitment I requires that Edison demonstrate that specific comments were in fact obtained from these principal emergency response organizations. No evidence of any specific comments from the reponse organizations has been provided. In fact, the general wording of the above-referenced letters suggests that no such comments were actually made.

Thirdly, Commitment I requires that Edison demonstrate that the specific comments were taken into consideration in the Time Estimate Study. Having no evidence of the specific comments, it is impossible to identify what comments may have been taken into consideration in the Time Estimate Study.

COMMITMENT J

Demonstrate that the assumptions regarding the availability of autos to permanent residents are justified and that public transport-dependent populations have been considered in devising the estimates.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commitment J has been satisfied.

Standard Operating Proceedure 6-SOP-8 fails to provide information as to the method to be used to transport residents who will not have access to automobiles for evacuation. 6-SOP-8 provides no information or assessment as to the assembly locations for individuals, bus routes to be operated, frequency of bus runs, number of buses to be used, and provisions for residents who cannot reach assembly points without assistance. Moreover, said response letter is deficient on it's face to the extent that transportation of said individuals without vehicles is not considered in devising the estimates.

Intervenors are undergoing efforts to verify that the assumptions regarding the availability of autos to permanent residents are justified.

COMMITMENT K

Demonstrate that there are no inconsistencies between the study and applicable portions of IPRA and GSEP which would significantly impact the reliability of the estimates.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment K based on it's response letter dated June 13, 1984. Said response is deficient on it's face to the extent that Intervenors identify inconsistencies in the study, IPRA, SOP's, GSEP, while verifying other Commitments.

Intervenors have engaged an expert witness to evaluate and conduct an independent assessment of Time Estimate Study and to identify inconsistencies which would significantly impact the reliability of estimates.

COMMITMENT L

Demonstrate that an Annex to the Evacuation Time Estimates Study has been developed which presents specific evacuation feasibility analyses for appropriate special facilities such that there is reasonable assurance that in the event of an evacuation of a special facility the health and safety of its residents can be adequate protected.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commitment G has been satisfied.

Intervenors have engaged an expert witness to evaluate and to conduct an independent assessment of the Time Estimates Study, to analyze whether there is reasonable assurance that in the event of an evacuation of a special facility the health and safety of its residents can be adequately protected.

COMMITMENT O

Demonstrate that, in the event evacuation of homebound and nursing home patients is necessary for those individuals whose medical needs require special care, there is reasonable assurance that adequate facilities to safely transport and host these individuals are available.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commitment O has been satisfied.

Intervenors are undergoing efforts to verify that adequate facilities exist to safely transport and host homebound and nursing home patients whose medical needs require special care in the event evacuation is necessary.

COMMITMENT Y

Demonstrate that IPRA includes adequate provisions to effectuate the evacuation of recreation areas with identifiable transport-dependent populations such that there is reasonable assurance that the health and safety of these individuals in adequately protected.

Response:

The information provided by Commonwealth Edison to the Intervenors in a letter response dated June 13, 1984 fails to provide sufficient information to allow the Intervenors to determine whether Commitment Y has been satisfied.

Intervenors are undergoing efforts to verify that IPRA includes adequate provisions to effectuate the evacuation of reacreational areas with identifiable transport-dependent populations.

COMMITMENT Z

Demonstrate that IPRA includes reasonable provisions to effectuate the evacuation of transport-dependent individuals.

Response:

Intervenors disagree that Commonwealth Edison has satisfied Commitment Z based on it's response letter dated June 13, 1984.

Standard Operating Proceedure 6-SOP-8 fails to provide information as to the method to be used to transport residents who will not have a access to automobiles for evacuation. 6-SOP-8 provides no information or assessment as to the assembly locations for individuals, bus routes to be operated, frequency of bus runs, number of buses to be used, and provisions for residents who cannot reach assembly points without assistance. Additionally, 6-SOP-12, Byron Station EPZ Public Information Brochure Cards Maintenance, fails to provide for the identification of those individuals who cannot reach assembly points without assistance in a timely manner.

Sinnissippi Alliance for the Environment
326 North Avon Street Rockford, Illinois 61103

'84 JUL -9 A10:28

Mr. Alan Bielawski
Isham, Lincoln & Beale
Suite 5200
Three First National Plaza
Chicago, Il. 60602

July 2, 1984

Re: Byron Station Stipulated Emergency Planning Commitment S

Dear Alan:

Intervenors disagree that Commonwealth Edison has satisfied Commitment S based upon it's response letter dated April 16, 1984 and reply of May 10, 1984.

The Stipulation dated March 30, 1984 and the course of the negiotations which led to the signing of the Stipulation, didnnot designate Commitments Q-T as Public Information Brochure Commitments. These Commitments concerned public informaion. Insofar as the brochure may serve as an appropiate mechanism to be used by Edison to m meet these Commitments, Intervenors do not object to its use. However, the exclusive use of the brochure as presently composed fails to satisfy Commitment S by demonstrating "that the public has received and will continue to receive on a periodic basis accurate information regarding special measures with respect to handicapped individuals."

As Intervenors indicated previously, the brochure merely discloses Commonwealth Edisons mechanism for identifying handicapped individuals.

Sincerely yours,
Diane Chavez

cc: Service List

RELATED CORRESPONDENCE

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE
ATOMIC SAFETY AND LICENSING BOARD

'84 JUL -9 A10:27

DOCKETING & SERVICE
BRANCH

In the Matter of	)	
	)	Docket Nos. 50-454
COMMONWEALTH EDISON CO.	)	50-455
	)	
Byron Station, Units 1 and 2	)	July 2, 1984

CHANGE OF ADDRESS NOTICE

Effective July 2, 1984, please change my service address in this proceeding from 326 N. Avon St., Rockford, Il., 61103, to 528 Gregory St., Rockford, Il., 61108.

Also, as of July 6, 1984, my telephone number will be (815) 962-0413.

Thank you for your attention to this matter,

Sincerely yours,

Diane Chavez
DAARE/SAFE

cc: Service List