

507

ISHAM, LINCOLN & BEALE
COUNSELORS AT LAW

1120 CONNECTICUT AVENUE, N.W. • SUITE 840
WASHINGTON, D.C. 20036
202 833-9730

DOCKETED
USNRC

EDWARD S. ISHAM. 1872-1902
ROBERT T. LINCOLN. 1872-1889
WILLIAM G. BEALE. 1885-1923

CHICAGO OFFICE
THREE FIRST NATIONAL PLAZA
CHICAGO, ILLINOIS 60602
TELEPHONE 312 558-7500
TELEX 2-5288

*85 JUN 19 A10:52

June 17, 1985

Lawrence Brenner, Esq., Chairman
Administrative Law Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. Richard F. Cole
Administrative Law Judge
Atomic Safety and Licensing
Board
U.S. Nuclear Regulatory
Commission
Washington, D.C. 20555

Dr. A. Dixon Callihan
Administrative Law Judge
102 Oak Lane
Oak Ridge, TN 37830

Re: In the Matter of Commonwealth Edison Company
(Braidwood Nuclear Power Station, Units 1 and 2
Docket Nos. 50-456 and 50-457)

Dear Administrative Judges:

The Affidavit of John C. Golden, which was included with the Motion of Commonwealth Edison Company for Summary Disposition on Pleadings, dated June 11, 1985, references sections of the Generating Station Emergency Plan ("GSEP") and the Braidwood Station GSEP Annex. (Golden Affidavit, par. 3.) These documents were served in their entirety on the Licensing Board and all parties on March 15, 1985 and March 13, 1985, respectively. (Letters of Joseph Gallo to Administrative Judges.) For ease of reference, I am enclosing copies of the sections that were referenced by Dr. Golden in his affidavit.

Very truly yours,

Victor G. Copeland

Victor G. Copeland

8506200207 850617
PDR ADOCK 05000456
G PDR

One of the Attorneys for
Commonwealth Edison Company

VGC/mg

cc: Service List

DS03



Commonwealth Edison
One First National Plaza, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

CF

January 21, 1985

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Braidwood Station Units 1 and 2
Annex to GSEP
NRC Docket Nos. 50-456/457

Reference (a): E. D. Swartz letter to H. R. Denton
dated May 15, 1984

Dear Mr. Denton:

The enclosure to this letter provides a copy of our Braidwood Station Annex to the Commonwealth Edison Generating Stations Emergency Plan (GSEP) for your review. NRC Staff review of this information should allow for partial closure of Outstanding Part A Item No. 6 in the Braidwood SER.

This Annex has been incorporated into controlled copies of the Commonwealth Edison GSEP. It includes Emergency Action Levels (Table BWA 5-1) and Evacuation Time Estimates (Figure BWA 6-2) which were not part of the Draft Annex submitted with Reference (a).

Please address any comments or concerns that you or your staff may have regarding the enclosure to this office.

One (1) signed original and fifteen (15) copies of this letter with the Enclosure are provided for your use.

Very truly yours,

David H. Smith
Nuclear Licensing Administrator

cc: Monte P. Phillips - RIII
RIII Inspector - Braidwood

October, 1984
Revision 0

BRAIDWOOD GSEP ANNEX
REVISION INDEX PAGE

BWA PAGE	REVISION	BWA PAGE	REVISION
1	0	6-1	0
1-1	0	6-2	0
1-2	0	6-3	0
1-3	0	6-4	0
1-4	0	6-5	0
1-5	0	6-6	0
1-6	0	6-7	0
1-7	0	6-8	0
1-8	0	6-9	0
1-9	0		
1-10	0		
2-1	0	7-1	0
		7-2	0
		7-3	0
		7-4	0
3-1	0	7-5	0
		7-6	0
4-1	0	7-7	0
4-2	0	7-8	0
4-3	0	7-9	0
4-4	0	7-10	0
4-5	0	7-11	0
		7-12	0
5-1	0	7-13	0
5-2	0	7-14	0
5-3	0	7-15	0
5-4	0	7-16	0
5-5	0	7-17	0
5-6	0	7-18	0
5-7	0	7-19	0
5-8	0	7-20	0
5-9	0	7-21	0
5-10	0	7-22	0
5-11	0	7-23	0
5-12	0	7-24	0
5-13	0	7-25	0
5-14	0	7-26	0
5-15	0	7-27	0
5-16	0	7-28	0
5-17	0	7-29	0
		7-30	0
		7-31	0
		8-1	0
		8-2	0
		8-3	0

7.4 Protective Facilities and Equipment

The principal onsite assembly areas for Braidwood Station are the Machine Shop on the 401-foot elevation of the Service Building and the Unit #2 Turbine Building trackway. These areas are suitable because:

- 1) They are large open areas suitable for assembling a large number of people in a short time;
- 2) They are relatively close to the Security Gatehouse; and
- 3) They have a low probability of being affected by a serious accident involving the NSSS.

The offsite evacuation/relocation areas for Braidwood Station are discussed in Section 6.0 of this annex. All three locations are suitable, depending on the emergency condition, with personnel, supplies and communications readily available.

7.5 First Aid and Medical Facilities

Braidwood Station has an in-plant first aid/decontamination room on the 426 foot elevation of the auxiliary building near the station laboratory complex. This room is provided with a sink, a shower, a portable leaded glass shield, and a supply cabinet.

First aid kits, stretchers, sinks, eyewashes and emergency showers have been placed in strategic locations throughout the station.

October, 1984
Revision 0

As mentioned in the generic plan, medical treatment given to injured persons at the station is of a "first aid" nature. When more professional care is needed, injured persons are transported to a local hospital or clinic. St. Joseph Hospital in Joliet, Illinois is the designated hospital for handling contaminated injured personnel.



Commonwealth Edison
72 West Adams Street, Chicago, Illinois
Address Reply to: Post Office Box 767
Chicago, Illinois 60690

April, 1984
Revision 4

Policy Statement

This document has been prepared to delineate the requirements and procedures governing the Commonwealth Edison Company Nuclear Division Generating Stations Emergency Plan (GSEP). Implementation of the GSEP as covered by the Generic Plan and a Site Annex, including both corporate and site Emergency Plan Implementing Procedures (EPIPs), provides a degree of assurance that the number of adhoc decisions made during an emergency are minimized. The GSEP ensures that necessary equipment, supplies, and essential services are available to meet the needs of an emergency in order to provide for the health and safety of the public, including Commonwealth Edison employees, the limitation of damage to facilities and property, and the restoration of such facilities.

Implementation of the GSEP provides for compliance with applicable requirements of the Nuclear Regulatory Commission, Federal Emergency Management Agency, States of Illinois, Iowa, Wisconsin and appropriate local governments, and their applicable emergency plans.

The Division Vice President & General Manager, Nuclear Stations, is assigned the overall responsibility for implementation of the Generating Stations Emergency Plan. Authority and responsibility are assigned to the Technical Services Manager, Nuclear Services, for directing and administering the GSEP with respect to each nuclear generating station and for corporate personnel. Actual development, revisions and conceptual design of the generic GSEP, Site Annexes and EPIPs are responsibilities assigned to the Supervisor of Emergency Planning.

The scope of the GSEP covers all nuclear generating stations both during the licensing phase and during their operation.

C. Reed April 5, 1984
C. Reed Date
Vice President Nuclear Operations

April, 1984
Revision 4

Commonwealth Edison Company

GENERATING STATION EMERGENCY PLAN
(GSEP)

Reviewed by: *J. A. Holden*
Supervisor of Emergency Planning

4/5/84
Date

Approved by: *J. S. Scott*
Technical Services Manager

4/5/84
Date

Authorized by: *Dennis Galle*
Division Vice-President and
General Manager, Nuclear Stations Division

4/5/84
Date

6.5 Aid to Affected Onsite Personnel

6.5.1 Emergency Personnel Exposure

Being licensed by the Nuclear Regulatory Commission, all Commonwealth nuclear stations maintain personnel exposure control programs in accordance with 10 CFR 20. The Commonwealth Edison Radiation Protection Standards include guidance that should be used for limiting personnel exposures under emergency conditions. Whenever possible, the prior approval of the Station Superintendent, the Commonwealth Medical Director, and/or the Station's Radiation Protection Supervisor should be secured before exposing individuals to dose equivalents beyond 10 CFR 20 limits. In addition to the guidance of the Commonwealth Edison Radiation Protection Standards, emergency personnel exposures shall be limited to the recommendations of the U.S. Environmental Protection Agency as follows:

- 1) Emergency Workers - This applies to conditions where it is desirable to enter an emergency area to protect facilities, eliminate serious unplanned release of effluents, or to control fires.
 - a) Planned whole body dose equivalent shall not exceed 25 rems;
 - b) Planned dose equivalent to the thyroid shall not exceed 125 rems.
- 2) Life Saving Actions - This applies to search for and removal of injured persons or entry to the emergency area to prevent conditions that would injure other people.
 - a) Dose equivalent to the whole body shall not exceed 75 rems;
 - b) No limit for the thyroid since total loss of thyroid function could be allowable.

"The emergency limits outlined in this section shall be voluntary and, if received, be limited to once in a lifetime."

6.5.2 Decontamination and First Aid

6.5.2.1 General

There are no resident physicians, nurses, or industrial hygienists on the staff of Commonwealth's generating stations. However, the radiation protection personnel at each nuclear station are experienced in control of radioactive contamination and decontamination work. The radiation protection personnel and certain supervisors are also trained and qualified to administer first aid. These individuals are annually retrained in first aid by the station training staff. At least one of these individuals is available on shift at all times.

The functions of station personnel in handling onsite injured people are:

- 1) afford rescue;
- 2) administer first aid including such resuscitative measures as are deemed necessary;
- 3) begin decontamination procedures; and
- 4) arrange suitable transportation to a hospital when required.

6.5.2.2 Initial First Aid

Primary attention shall be directed to the actual factors involved in the treatment of casualties, such as: control of bleeding, resuscitation including heart and lung, protection of wounds from bacterial or radioactive contamination and the immobilization of fractures.

6.5.2.3 Decontamination

Nuclear Station radiation protection personnel shall provide an initial estimate of the magnitude of surface contamination of the injured and preliminary estimates of total body dose to the injured. Directed by radiation protection personnel, the station should carry out primary rapid and simple decontamination of the surface of the body when possible and advisable before transportation of the injured to a designated hospital.

6.5.3 Medical Transportation

Arrangements are made by each nuclear generating station for prompt ambulance service for transporting persons with injuries involving radioactivity from the respective generating station to designated hospitals. Such service is available on a 24-hour per day basis and is confirmed in writing. Radiation monitoring services shall be provided by Commonwealth whenever it becomes necessary to use the ambulance service for the transportation of contaminated persons.

Injured persons shall be transported to a hospital or other medical facility in a prudent and timely manner. Those persons contaminated with radioactive material shall be taken to the designated hospital and be accompanied by a person qualified in radiation monitoring techniques.

6.5.4. Medical Treatment

6.5.4.1 Hospital Facilities

Arrangements, confirmed in writing every two (2) calendar years, are maintained by Commonwealth with a qualified hospital located in the vicinity of each nuclear generating station for receiving and treating of contaminated or exposed persons. Such nearby hospital facilities shall be utilized for decontamination and initial treatment of persons with injuries involving radioactivity and requiring immediate hospital care. Commonwealth shall provide medical consultants to aid in any special care necessary at these facilities.

Arrangements, confirmed in writing every two (2) calendar years, are also maintained by the corporate office with a qualified major medical facility well equipped and staffed for dealing with persons having radiation injuries and whenever necessary, such persons will be transferred to this major hospital facility for extended specialized treatment. Currently, Northwestern Memorial Hospital in Chicago, Illinois serves as this hospital. Commonwealth will have available to the staff of this hospital its specialist who will provide the direction of the special care necessary for the treatment of persons having radiation injuries.

6.5.4.2 Radiological Medical Consultants

Because of the specialized nature of the diagnosis and treatment of radiation injuries, Commonwealth's corporate medical office maintains a roster of physicians especially competent in this area of medicine and available for the

April, 1984

Revision 4

care of persons with these special problems. Included in this roster are experts in the treatment of internal contamination, cutaneous radiation injury, total body irradiation and other potential problems related to exposure by ionizing radiation or radioactive materials.

These specialists may be in direct charge of the care of these patients or serve as consultants to other physicians in charge of their care.