

December 30, 1992

Attached is a copy of Corporate Required Reading Package 92-11, "Review of the Offsite ERO Augmentation Drill Process and changes contained in Revision 1 to CEPIP 2000-01S." This reading packages discusses the procedure to be used by responders during an augmentation drill for an EOF or JPIC. It also discusses changes made to CEPIP 2000-01S (currently deleted) in the interim CEPIPs 1130-01 & 1130-02 and final CEPIPs 1130-01 Rev. 1 & 1130-02 Rev. 1. Important revisions have been made to both the drill evaluation criteria and to the actions expected of responders. Please carefully read and follow the guidance contained in this reading package.

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CORPORATE EMERGENCY RESPONSE ORGANIZATION
Required Reading Package
(92-11)

DATE: December 30, 1992

SUBJECT: Review of the Offsite ERO Augmentation Drill process
and changes contained in Revision 1 to CEPIP 2000-01S.

REFERENCES: - CEPIP 2000-01S, Rev. 0, December 1991
- CEPIP 2000-01S, Rev. 1, July 1992
- CEPIP 1130-01, Rev. 0, November 1992
- CEPIP 1130-01, Rev. 1, December 1992
- CEPIP 1130-02, Rev. 0, November 1992
- CEPIP 1130-02, Rev. 1, December 1992

APPLICABLE GSEP POSITIONS: All GSEP Positions

SUMMARY:

The purpose of this reading package is to describe and clarify the process of conducting an off-hours corporate ERO augmentation drill. The changes contained in recent revisions to procedure CEPIP 2000-01S (Conduct of Offsite ERO Augmentation Drills) will also be discussed and highlighted.

A. Changes to the actions expected of a responder

1. Responders are expected to use CEPIP 1130-02 for responding to augmentation drills. This information was moved from CEPIP 2000-01S Attachments B and C, in separating drill administration functions from drill responder functions. When responding to an actual emergency, CEPIP 2000-01 should be used, not CEPIP 1130-02 !
2. All responders should be aware that a brief one-page summary of CEPIP 1130-02 is contained in Attachment C of that procedure. The abbreviated instructions are intended for use by those callers who have thoroughly read CEPIP 1130-02 and are familiar with its contents. Its use is encouraged to speed the time for making all notification calls. CEPIP 1130-02, Attachment C is attached to this reading package for the user's reference.
3. References to gathering or transmitting information about EAL number(s), event descriptions, and/or other information have been completely deleted from the CEPIPs 1030-01 and 1030-02. Responders who make call-tree notifications are expected to provide only : (1) the name of the affected station, (2) the current Emergency Classification level, and (3) the facility to which another responder is to

(simulate) report. The purpose of limiting the available information to these three (3) items is to expedite the response of all responders and to prevent both an extended discussion and pre-management of the event by offsite responders. In an actual emergency, complete incident information would be available at their emergency facility when a responder arrives.

4. A note has been added to CEIP 1130-02 which provides a definition of "available" : a person is considered to be "available" for emergency response purposes if they can be in their car and travelling to their designated emergency facility within fifteen (15) minutes of receiving their notification call. If you cannot be on the road within fifteen minutes, you are NOT CONSIDERED TO BE AVAILABLE !! This definition is intended to resolve the question of how a potential responder should evaluate their personal situation in considering their availability. The definition of "availability" does not take into account any difficulties a responder might encounter in travelling to their designated facility (gasoline, weather, etc.).

B. Procedure organization changes :

CEIP 2000-01S has been deleted, effective December 1, 1992. The subject matter of CEIP 2000-01S is now governed by two (2) new CEIPs, 1030-01, "Conduct of Emergency Response Organization Off-Hours Augmentation Drills" and 1030-02, "Responding to Emergency Response Organization Off-Hours Augmentation Drills".

CEIP 1130-01 is intended for use primarily by the Regulatory Services Emergency Preparedness department, and describes how an off-hours augmentation drill is prepared, initiated, and evaluated. Copies of this procedure have been provided to NDOs and MEOs for their information.

CEIP 1130-02 is intended for use by all persons who may be contacted during an off-hours augmentation drill. It contains specific instructions for use by the NDO, by all responders when they are called, and by responders who also perform calls. Maps to all Edison emergency response facilities are attached to this procedure. This procedure is intended to be kept available at each responder's home, in the event they are contacted as part of an augmentation drill.

C. Changes to the preparation, initiation, and evaluation of the drill :

1. A requirement has been added that drills which begin after 2130 hours (9:30 pm) have the prior permission of both the Emergency Preparedness Supervisor and the participating NDO. This requirement addressed participant comments from the May 1992 Augmentation Drill.
2. A note has been deleted which had referred to not conducting drills immediately before or following normal working hours. This deletion is intended to address potential regulatory concerns about the mechanism of conducting augmentation drills.
3. A note has been deleted which had referred to providing the NDO additional information beyond that contained on the (simulated) initiating NARS form. Specific EAL and event description information have to be obtained in separate telephone call from the NDO to the affected station. Due to the extreme time restrictions being placed by the NRC on activating emergency facilities, particularly the CEOF, an NDO cannot take additional time to call the station before initiating a GSEP call-out. This deletion will reduce the amount of time required before an NDO initiates the GSEP Call-Tree.
4. A note has been deleted which had referred to the ability of the NDO to choose staffing levels at emergency facilities which were precautionarily staffed rather than activated. This change reflects the current practice of mandatory staffing at the CEOF for "significant" ALERT classifications, rendering the previous policy obsolete.
5. The allowed period for preparing the drill report following an augmentation drill has been lengthened from 30 days to 60 days. This was done because of NRC comments, and because of observed delays in the return of participant's drill logs from previous drills.
6. A procedural step has been added to include a time requirement of 60 days for the preparation of any "Reading Packages" or "Lessons Learned Letters" which may be necessary as a result of an augmentation drill.
7. The allowed period to prepare and conduct a remedial drill following a Yellow or Red drill evaluation has been changed to 90 days, regardless of when the drill is conducted. The previous procedure re

quired conducting a remedial drill within 30 days, or prior to the end of the current semi-annual (January through June, July through December) period, whichever was the shorter. A note has been added encouraging EP to conduct a remedial drill within the current semi-annual period when possible, but which removes the previous requirement.

8. Changes have been made to the Drill Objectives of an augmentation drill :

- a. The previous objective of "contacting all persons who are assigned to a designated facility" has been deleted. This objective can be assumed to be part of the objective of completing all calls by 90 minutes after the initiation of the drill.
- b. The previous objective of "contacting all persons who are necessary to the Minimum Staffing of a facility within 60 minutes" has been deleted. This objective is replaced by objectives addressing the estimated activation times of emergency facilities (see 8.c, 8.d).
- c. An objective of "achieving an estimated activation time of less than 60 minutes at the CEOF" has been added. This objective addresses NRC concerns that the success of an augmentation drill depends on when an emergency facility could be activated and not on how quickly emergency response organization notifications are made.
- d. An objective of "achieving an estimated activation time of less than 135 minutes [2 hours 15 minutes] at an EOF" has been added. This objective addresses NRC concerns that the success of an augmentation drill depends on when an EOF could be activated and not on how quickly emergency response organization notifications are made.

9. A new evaluation method has been established which considers estimated facility activation times, call-tree notification times and objective factors to obtain an overall combined drill evaluation.

- a. Previous criteria for making an evaluation of STRONG (Green window) based on contacting responders have been deleted. These criteria were deleted to address NRC concerns that the primary objective of an augmentation drill was to establish facility staffing times and not

emergency response organization notification times.

- b. Previous criteria for making evaluations of SATISFACTORY (White Window), WEAK (Yellow Window) and NOT MET (Red Window) have been deleted.
- c. Facility activation time requirements have been added, which provide an upper limit for the total drill evaluation - that is, a drill cannot be evaluated at a higher rating than the lowest rating indicated on a table for CEOF and EOF staffing times.
- d. An evaluation criteria has been included for the four Drill Objectives which do not address facility activation times : one (1) missed objective is permitted to be evaluated as SATISFACTORY, two (2) missed objectives are to be evaluated as WEAK, and three or more (3 or 4) missed objectives require an evaluation as NOT MET.
- e. An overall evaluation criteria has been included to determine the final drill rating, based on a combination of the facility activation times table (Objective 1) and the remaining objectives (Objectives 2 through 5) : the final drill rating is the lower of the two group ratings; if the facility activation time objective is rated as STRONG and the remaining objectives are rated as SATISFACTORY, then the overall drill is evaluated as STRONG.

D. Other changes to the procedure

- 1. A set of maps to all CECo emergency facilities is attached to CEPIP 1130-02. This is intended as an aid for use in estimating one's time of arrival at their designated facility. It is suggested that responders use these maps to pre-determine their driving time to each of the CECo emergency facilities to which they may be assigned.
- 2. A note has been added to CEPIP 1130-02 which lists the positions which have call-tree responsibility.

READING PACKAGE OBJECTIVES:

- 1) The reader should be familiar with how offsite corporate augmentation drills are conducted.
- 2) The reader should be aware of recent changes made to the procedure which governs the conduct of augmentation drills (CEPIP 2000-012), particularly implementation of a new evaluation criteria : demonstrating the ability to achieve CEOF minimum staffing within one (1) hour of initiating the drill.
- 3) The reader should be aware of the importance of minimizing the information which is transmitted while notifying a responder to report to an emergency facility. Callers should not provide additional information beyond that described in this reading package, nor should they speculate about the emergency. Responders should not take time to question their caller about the emergency situation.
- 4) "Availability" has been defined as being able to leave one's house within fifteen (15) minutes of receiving an emergency notification call. All responders should use this definition as a guide in evaluating their personal situation.
- 5) The reader should be aware that administrative and response functions from CEPIP 2000-01S have been separated, creating CEPIPs 1130-01 (drill evaluation) and 1130-02 (responder actions).

ATTACHMENTS : Abbreviated Instructions for Augmentation Responders, Attachment C, CEPIP 1130-02, "Responding to Corporate Emergency Response Organization Off-Hours Augmentation Drills".

CONTACT FOR ADDITIONAL INFORMATION

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