

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
COMMONWEALTH EDISON COMPANY	)	Docket Nos. 50-456
	)	50-457
(Braidwood Nuclear Power Station,	)	
Units 1 and 2)	)	

AFFIDAVIT OF THOMAS J. PLOSKI  
IN SUPPORT OF STAFF RESPONSE TO MOTION OF  
COMMONWEALTH EDISON COMPANY FOR SUMMARY  
DISPOSITION OF ROEM CONTENTION 1(c)

- I, Thomas J. Ploski, being duly sworn, depose and state as follows:
1. I am an Emergency Preparedness Analyst in the Emergency Preparedness Section, Emergency Preparedness and Radiological Protection Branch, Division of Radiation Safety and Safeguards, NRC Region III. I have personal knowledge of the matters set forth herein and believe them to be true and correct to the best of my knowledge, information and belief. A copy of my professional qualifications is attached.
  2. I give this affidavit in response to the "Motion of Commonwealth Edison Company For Summary Disposition On Pleadings" dated June 11, 1985. The Motion seeks, in part, summary disposition of Subparagraph (c) of Contention 1 of Intervenor Bridget Little Rorem, et al. Contention 1(c) which states as follows:

Intervenor contends that an adequate emergency plan for the Braidwood Station should include the following:

\* \* \*

- (c) A suitable plan for providing medical treatment to operating personnel who might be exposed to radiation in the event of an accident including transportation to medical facilities equipped to treat radiation casualties.

3. I have read the "Motion of Commonwealth Edison Company for Summary Disposition on Pleadings" dated June 11, 1985, Material Facts As to Which There is no Genuine Issue to Be Heard," regarding Rorem Contention 1(c) and the Affidavits of John C. Golden dated June 12, 1985 and Roger E. Linnemann, M.D. dated June 11, 1985.
4. I have independently reviewed the emergency plan for the Braidwood Station, which is comprised of the Generating Stations Emergency Plan (GSEP), common to all of Commonwealth Edison Company's nuclear generating stations, and the Braidwood Annex to this generic GSEP. My review of the Applicant's emergency plan was done in light of the requirements set forth in 10 C.F.R. § 50.47(b)(12), 10 C.F.R. Part 50, Appendix E, Paragraph IV.E and the guidance set forth in NUREG-0654, Revision 1, Section II, Paragraph L.
5. Subpart (c) to Contention 1 asserts that, for the Applicant's plan to be adequate, it should include "a suitable plan for providing medical treatment to operating personnel who might be exposed to radiation in the event of an accident, including transportation to medical facilities equipped to treat radiation casualties."

6. The Applicant's emergency plan contains an adequately detailed description of adequate provisions for care to be given any persons at the Braidwood Station who would require medical treatment after being exposed to radiation.
7. 10 C.F.R § 50.47(b)(12) of the Commission's emergency planning regulations requires that "arrangements are made for medical services for contaminated injured individuals." 10 C.F.R. Part 50, Appendix E, Paragraph IV.E requires that "adequate provisions shall be made and described for emergency facilities and equipment, including: . . . (5) arrangements for the services of physicians and other medical personnel qualified to handle radiation emergencies onsite; (6) arrangements for transportation of contaminated injured individuals from the site to specifically identified treatment facilities outside the site boundary."
8. NUREG-0654, Revision 1, Section II, Paragraph L, contains guidance criteria to be used by the Staff when evaluating plans made for providing care to any onsite personnel who may require medical treatment following exposure to radiation. Relevant criteria in Paragraph L state that the Applicant shall arrange for local and backup hospitals and for medical services having the capability of evaluating radiation exposure and uptake. The Applicant shall also provide assurance that persons providing medical services are adequately prepared to handle radiation accident victims. The

Applicant shall also have arrangements for transporting victims of radiological accidents to medical support facilities.

9. The generic portion of the Applicant's plan states that Commonwealth Edison's Medical Director is responsible for obtaining agreements for the services of physicians and medical consultants specifically skilled in the medical treatment aspects of radiation accidents and other medical consultants, as may be necessary, for the care of persons involved in a radiation exposure incident. GSEP Table 4.3-13 and Section 6.5.4. This roster of available, specifically skilled persons is maintained in the Applicant's corporate medical office. The plan indicates that these specialists may be in direct charge of patient care or may serve as consultants to other physicians in charge of their care. Id.
10. The plan also states that each nuclear generating station is responsible for obtaining agreements, confirmed in writing every two calendar years, with a qualified local hospital which will receive and initially treat contaminated or exposed persons who may require hospital care. The Applicant has committed to provide medical consultants to aid in any special care necessary at the local hospital. The Braidwood Annex to the generic GSEP identifies St. Joseph Hospital in Joliet, Illinois, as the local hospital for persons at the Braidwood Station. This hospital already serves as the local hospital for any victims of radiological accidents at the Applicant's Dresden Nuclear Generating Station who may need hospital care. A

formal Letter of Agreement, maintained separately from the plan, has been executed in late 1984 between responsible persons at the Braidwood Station and St. Joseph Hospital. GSEP Section 6.5.3 and Section 6.5.4, Braidwood Annex Sections 4.2 and 7.5.

11. The plan indicates that each nuclear generating station is also responsible for making arrangements, confirmed in writing, with a local ambulance service that is available on a 24-hour basis for transporting injured persons from the generating station to the local hospital. Such persons would include those who may also have been contaminated with radioactive material or have been exposed to sufficient levels of radiation to warrant their transport to a hospital. The Applicant has committed in the plan to provide radiation monitoring services, as may be necessary, to the ambulance service when transporting victims of radiation incidents from the Braidwood Station. The Braidwood Annex to the generic GSEP identifies the Braidwood Fire and Rescue Department as the organization that will provide ambulance services to the Braidwood Station. A formal Letter of Agreement, maintained separately from the plan, has been executed in late 1984 between responsible persons at the Braidwood Station and the Braidwood Fire Department. Braidwood Annex Sections 4.2 and 7.5; GSEP 6.5.3.
12. In addition to local hospital and ambulance service support, the Applicant maintains arrangements, confirmed in writing every two calendar years, with a major medical facility equipped and staffed

for dealing with persons having radiation injuries. The plan indicates that, whenever necessary, such persons will be transferred to this major hospital facility for extended, specialized treatment. GSEP Section 6.5.4. The plan identifies Northwestern Memorial Hospital in Chicago, Illinois, as this major medical facility for all of Commonwealth Edison's nuclear stations, and indicates that the Applicant shall provide medical consultants to aid in any special care, as necessary, at this facility. Id.

13. The plan states that the Station Superintendent is responsible for making an annual contact with organizations with which the Station has formal agreements for support during an emergency. This annual contact consists of a written invitation for members of these organizations to visit the Station, discuss the emergency plan, and to familiarize themselves with plant facilities and personnel. For organizations which provide specialized services during a radiological emergency, such as medical and ambulance services, the plan states that there will also be an annual written offer to train persons in these organizations relative to their emergency support roles. Those organizations having personnel who may have need to enter the site shall also be offered annual training as to the identities (by position and title) of persons in the onsite organization who will control their support activities while they are onsite. The Applicant's plan also includes a commitment for conducting an annual medical drill, which contains provisions for participation by local support organizations, such as the local



hospital and ambulance service. The Commonwealth Edison Division Vice-President, Nuclear Stations, and his staff are responsible for ensuring that this drill is scheduled and conducted. GSEP Sections 8.2, 8.3.1 and 8.3.2.5.

14. The Applicant's emergency plan identifies both a local hospital and a major medical facility with which formal letters of agreement have already been executed for the treatment of any persons located at the Braidwood Station who may have been exposed to dangerous levels of radiation. Both institutions are already under agreement to receive victims of radiological accidents from one or more of the Applicant's operating nuclear generating stations. The Applicant maintains a roster of physicians and other medical specialists who are qualified to treat victims of radiological accidents. These medical personnel would be made available at either the local hospital or major medical facility, as necessary, to take direct charge or advise in the the care of patients. The plan identifies a local organization with which a formal Letter of Agreement has been executed for providing 24-hour ambulance service, for onsite victims of radiological accidents, from the Braidwood Station to the local hospital. The plan also describes provisions for offering annual training, including drill participation, on radiological emergency support roles for local ambulance services and local hospital staffs. Due to the nature of radiological exposure injuries, the NRC has concluded that any medical treatment needed for cases of extreme exposure would not be immediate, as may be required for

treating injured workers who may also have become radiologically contaminated. Thus, any medical treatment for radiologically exposed persons could be arranged for on an ad hoc basis.

15. In conclusion, the portions of the Applicant's emergency plan regarding the provision of medical treatment to operating personnel who might be injured in the event of an accident, including transportation to medical facilities equipped to treat radiation casualties, has been reviewed by the Staff in light of the requirements set forth in 10 C.F.R. § 50.57(b)(12) and 10 C.F.R. Part 50, Appendix E, Paragraph IV.E and the guidance set forth in NUREG-0654, Revision 1, Section II, Paragraph L and found to be in compliance with said requirements and guidance.



Thomas J. Ploski  
Thomas J. Ploski

Subscribed and sworn to before  
me this 10th day of July, 1985

Marcia L. Smith  
Notary Public

My commission expires: 3/86



THOMAS J. PLOSKI

Position           Emergency Preparedness Analyst

Emergency Preparedness Section  
Emergency Preparedness and Radiological Protection Branch  
Division of Radiation Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Region III

Birthdate          May 16, 1947

Education          B.S. in Meteorology - Penn State University (1971)  
B.A. in Chemistry - Illinois Institute of Technology (1970)  
Graduate level studies in Environmental Engineering -  
University of Tennessee (1977-1978) and Illinois Institute of  
Technology (1978)  
Graduate studies in Business Administration-De Paul  
University (1979-1984)

Experience          Emergency Preparedness Analyst - Reviews and evaluates  
(1982-present) nuclear power reactor emergency plans and related implementing  
procedures for compliance with applicable regulatory require-  
ments and guidance. Serves as primary emergency preparedness  
reviewer for assigned facilities. Functions as inspection team  
leader, as assigned, for emergency preparedness exercise,  
routine, and appraisal inspections. Prepares related NRC  
inspection reports and verbally presents preliminary inspection  
findings to NRC and licensee management, as needed. Prepares  
relevant inputs to Systematic Assessment of Licensee  
Performance (SALP) report for assigned facilities. Assists,  
as requested, in the development and preparation of suggested  
improvements to the emergency preparedness program.  
Participates, as needed, in actual incident response  
situations. (NRC)

(1980-1982)       Staff Meteorologist - Managed or assisted in the performance  
of air quality impact assessment and regulatory impact  
assessment studies for a variety of industrial clients.  
Performed related atmospheric dispersion modeling and  
meteorological and air quality data analyses, as needed.  
Prepared portions of related technical reports for submission  
to clients and or regulatory agencies. (Dames & Moore)

- (1978-1980) Staff Meteorologist - Prepared meteorological sections of a Final Safety Analysis Report and an Environmental Report for a proposed nuclear power plant. Performed related data analyses. Performed air quality impact assessments, as needed, in support of coal-fired power plant permitting and siting studies. Reviewed the quality of onsite meteorological data collected by consultants at several nuclear power plant sites, and assisted in an evaluation of consultants to perform one such task. (Sargent & Lundy)
- (1974-1978) Staff Meteorologist - Trained and managed a small staff responsible for the quality control of meteorological data collected at nuclear and coal-fired power plant sites. Developed related data review and quality assurance procedures. Interfaced with monitoring system engineers and technicians, as needed, to improve program capabilities to promptly identify and correct causes of invalid data collection. (Tennessee Valley Authority)
- (1970-1974) Weather Officer - Conceived 24-hour weather forecasts for an Air Force base. Issued weather warnings and advisories, as needed. Briefed aircrews and senior officers on weather conditions affecting aircraft operations. Analyzed current meteorological conditions and forecasting aides to develop forecasts and interpret others' forecasts. (U.S. Air Force)