

December 17, 1996

50-10

Ms. Irene M. Johnson, Acting Manager  
Nuclear Regulatory Services  
Commonwealth Edison Company  
Executive Towers West III  
1400 Opus Place, Suite 500  
Downers Grove, IL 60515

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION REGARDING THE CENTRAL EMERGENCY OPERATIONS FACILITY (TAC NOS. M91309, M91310, M91311, M91312, M91313, M91314, M91315, M91316, M91317, M91318, M91319 AND M91320)

Dear Ms. Johnson:

By letter dated January 5, 1995, Commonwealth Edison Company (ComEd) requested staff review and approval to consolidate the near site Emergency Operations Facilities (EOF) into a single Central EOF. On May 23, 1996, we issued a Request for Additional Information (RAI); ComEd responded on July 11, 1996.

As our review has continued, we have identified the need for further information. Please provide the information requested in the enclosed RAI. In addition, we believe that a meeting to discuss ComEd's response to this RAI, as well as resolve any remaining issues on the proposed Central EOF, would be beneficial. Please contact me to arrange such a meeting.

Sincerely,

/s/

George F. Dick, Jr., Project Manager  
Project Directorate III-2  
Division of Reactor Projects - III/IV  
Office of Nuclear Reactor Regulation

Docket Nos. STN 50-456, STN 50-457,  
STN 50-454, STN 50-455, 50-10, 50-237,  
50-249, 50-373, 50-374, 50-254, 50-265,  
50-295, 50-304

Enclosure: RAI

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REQUEST FOR ADDITIONAL INFORMATION

COMMONWEALTH EDISON COMPANY

RELATED TO THE REVIEW OF

THE CENTRAL EMERGENCY OPERATIONS FACILITY

1. During its review of the Interim Emergency Operations Facility (EOF) request from the licensee, one of the issues that was addressed was ComEd's ability to staff and activate the facility within 60 minutes. In response to the staff's concerns, ComEd successfully conducted unannounced drills to support its position that the Interim EOF can be activated in a timely manner (60 minutes). However, during an actual event at Quad Cities in May 1996, the licensee took 98 minutes to accomplish the activation of the Interim EOF. What assurances can ComEd provide to the staff that the Central EOF will be staffed and activated within 60 minutes, including off-hours, in accordance with the goal as stated in the NUREG-0737, Supplement 1 (Clarification of TMI Action Plan Requirements)?
2. It is the expectation of the staff and the general practice of industry that from the time a Site Area Emergency or General Emergency is declared, activation of an EOF should occur within 60 minutes. Please indicate the time at which the "activation clock" is started and the criteria used to determine when the EOF is activated for the ComEd Central EOF.
3. The conduct of a full participation exposure and ingestion pathway exercise as specified in 10 CFR Part 50, Appendix E (F)(2)(c) and (d) would fully demonstrate the functionality of the Central EOF. Please indicate to the staff how this will be accomplished.
4. In response to question 8 of the staff's May 23, 1996 RAI, ComEd indicated that any of its six stations' Technical Support Centers (TSC) can act as a back up to the Central EOF. Please provide information on the use of these TSCs as a backup, including the present and future plans, arrangements, training, procedures and experience using this approach.
5. In ComEd's response to question 12 of the staff's May 23, 1996 RAI, ComEd stated that the NRC site team could use the current EOFs in order to be located near the site. Please provide additional information regarding the number and type of personnel, physical arrangements, communications, and other support requirements that would be available.
6. ComEd's response to Question 13 of the staff's May 23, 1996 RAI, did not adequately answer the question regarding accommodating Federal, State and local response agencies if, in the future, those agencies wanted to send personnel to the site. Please provide information on how Federal, State, and local response agencies would be accommodated near the plant?

ENCLOSURE

7. In response to question 15 of the staff's May 23, 1996 RAI, ComEd discussed its layered communication system. Are any of these systems dedicated for emergency preparedness? How often is the computerized call out system tested and what is its reliability record since being installed?
8. Please explain how the use of a centralized EOF provides the "optimum" functional characteristics specified in NUREG-0696, "Functional Criteria for Emergency Response Facilities," (pp.17-18) as compared to a near-site EOF. Please include in your response consideration of the Commission's determination that face-to-face -- rather than telephone -- communications between a licensee and offsite officials provide the best means to exchange information and formulate protective action recommendations. *Metropolitan Edison Company (Three Mile Island Nuclear Station, Unit No. 1), CLI-83-22, 18 NRC 299, 308 (1983).*