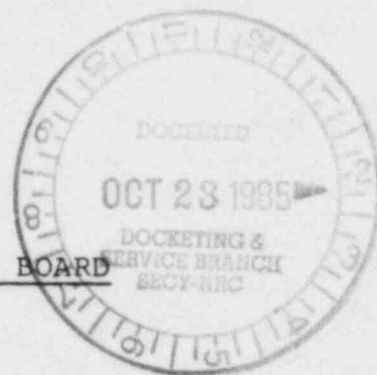


RELATED CORRESPONDENCE

10/22/85

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
(Braidwood Station Units 1) 50-457
and 2))

SUPPLEMENTAL TESTIMONY OF
LAWRENCE D. BUTTERFIELD
ON ROEM CONTENTION 1(a)

- Q.17. What is the purpose of this supplemental testimony?
- A.17. The purpose of this supplemental testimony is to address the advance arrangements established for the dissemination of information to representatives of the news media in the event of an emergency.
- Q.18. What regulatory provisions establish the standard for this activity?
- A.18. The regulatory standard is part of 10 C.F.R. §50.47(b)(7), namely the provisions which state:
- ... the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.
- Implementing guidance for this standard is found in NUREG-0654, pages 49-51, paragraphs 3, 4 and 5.
- Q.19. What is your understanding of the scope of this aspect of § 50.47(b)(7)?

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PDR ADOCK 05000456
T PDR

A.19. This aspect of § 50.47(b)(7) provides that arrangements with the news media must be established in advance so that information about a nuclear emergency can and will be effectively communicated through the media to the public. These advance arrangements do not involve, however, the official notice and instructions given to the public regarding an emergency via the prompt public notification system and the radio stations of the Emergency Broadcast System. That activity is the subject of a separate regulatory provision, namely 10 C.F.R. § 50.47(b)(5). Although the news media will be informed of and may report the official notice and instructions, the media is not relied upon for that purpose.

Q.20. Have you reviewed the emergency plans for Braidwood Station to determine whether they adequately address the standards you mention in response to question 17?

A.20. Yes. In my judgment, the emergency plans for Braidwood Station adequately and completely address the standards regarding advance planning with the news media found in Section 50.47(b)(7) and NUREG-0654.

The base volume of the Illinois Plan for Radiological Accidents (IPRA Vol. I) outlines how the public will be kept informed of an accident through the media; how rumors will be controlled; and how the media will be acquainted with the emergency plans. IPRA Vol. I also provides that a Joint Public Information Center (JPIC) will be located at the Emergency Operations Facility near each nuclear

generating station and that the State will provide a spokesperson to brief the press on the emergency.

The Braidwood-specific volume of the State's plan (IPRA Vol. VII) contains parallel provisions for each of the three counties involved with emergency planning for the Braidwood Station plume exposure pathway emergency planning zone (EPZ). These provisions also establish that each county and municipality in the EPZ will have a spokesperson responsible for public information.

Commonwealth Edison's Generating Stations Emergency Plan (GSEP) establishes its offsite GSEP group which includes an Emergency News Center Director and Information Director and their staff. Their responsibilities are outlined in the GSEP and in Emergency Plan Implementing Procedures. The specific people responsible for these positions are identified in the GSEP Telephone Directory.

Copies of significant pertinent provisions from the State's plan and from Commonwealth Edison's plan and procedures are attached as Attachment D.

- Q.21. Please describe the Joint Public Information Center (JPIC) for Braidwood Station.
- A.21. In accordance with the State's plan, the Emergency Operations Facility (EOF) for Braidwood Station has a large room dedicated for use as a JPIC. The Braidwood Station EOF is located in Mazon, Illinois, about ten miles from Braidwood Station. The JPIC in the EOF will have

numerous telephones available for use by the media. The JPIC will also have visual aids on hand.

In addition to the JPIC's facilities, there will be media centers associated with the State's Emergency Operation Center (ESDA's State headquarters in Springfield, Illinois), and with the Emergency Operations Centers for Grundy, Will and Kankakee Counties. All of these Emergency Operations Centers will be joined with each other and with the JPIC by a telecopier system which will be used to distribute information including press releases.

Q.22. Describe how information will be disseminated to representatives of the news media at the JPIC during an emergency.

A.22. During an emergency, representatives from the State of Illinois, the Federal government and Commonwealth Edison will be present at the JPIC. Other representatives from local governments and private agencies may also be present and participating. These representatives will work together to provide coordinated dissemination of information to the news media representatives in news briefings, which will also permit the media to ask questions and request further information.

The State's Public Information Officer (PIO) will be primarily responsible for providing information which concerns the health and safety of the public.

Commonwealth Edison's spokesperson will primarily explain the technical aspects of the accident.

Q.23. What provision is there for dealing with rumors during an emergency?

A.23. Rumor control activities are managed by the State of Illinois. The State maintains telephone numbers dedicated to rumor control and which will be known to local governments, but not the general public. When a local government cannot control locally generated rumors, they will contact the State EOC over the dedicated telephones and advise the State of the rumor. If possible, the State will respond to the rumor directly. Otherwise, the response to the rumor will be incorporated in the next news briefing provided to the media representatives.

During the news briefings, questions and requests for rumor verification may arise from the news media representatives. The spokesman or State public information officer will respond with available information. If it is determined that a rumor represents serious misinformation, the misinformation could be corrected immediately by the issuance of a news release from the JPIC.

Q.24. How are representatives of the news media acquainted with the JPIC and procedures for news dissemination during an emergency?

A.24. Representatives of the news media are invited to attend press briefings which are held annually for each nuclear power plant in Illinois. These briefings are presented

jointly by the State and Commonwealth Edison. The press briefings are usually scheduled in conjunction with the annual emergency exercise for each nuclear power plant. In those instances, the media representatives are also invited to participate in the exercise itself at the JPIC.

The first press briefing for Braidwood Station will be held in conjunction with the emergency exercise scheduled for November 6, 1985. The press briefing will acquaint the media representatives with basic information such as nuclear reactor operation, radiation, and emergency planning. The media representatives are also introduced to the JPIC as the central point through which information is disseminated to the news media by the State, the utility, and the Federal government. As a part of the briefing, the media representatives will receive a "Press Kit" which will include a "Reporter's Guide to Braidwood Nuclear Power Station" and the Emergency Information Booklet.

It should be noted that a majority of the news media representatives in the Braidwood area have been involved in past exercises and briefings for Dresden and/or LaSalle County Stations. These activities have all taken place at the Mazon EOF, which is the same facility that would be used in the event of an emergency at Braidwood Station.

BUTTERFIELD ATTACHMENT "D"

Provisions from the following documents:

- Illinois Plan for Radiological Accidents (IPRA) Vol. I
- IPRA Vol. VII - Braidwood Station
- Commonwealth Edison Company's Generating Stations Emergency Plan (GSEP)
- Commonwealth Edison Company's Emergency Plan Implementing Procedures

**The Illinois Plan
for
Radiological Accidents
(IPRA)**

STATE GENERAL PLAN

Volume I

B. 2. Generating Stations Emergency Plan Support Centers

The following sections describe centers which may be activated during an incident.

* * * * *

e. Emergency Operations Facility

An Emergency Operations Facility has been established near each nuclear generating station (Dresden Station - Mazon EOF, LaSalle County Station-Mazon EOF, Quad Cities Station - Morrison EOF, Zion Station - Westinghouse Training Center, Byron Station - Dixon EOF, Braidwood Station - Mazon EOF).

* * * * *

The Joint Public Information Center is located at the EOF. A technical spokesperson will be available at the JPIC to brief the press on the emergency and the activities underway to deal with the situation. Space will be allocated within each EOF to accommodate the news media.

PUBLIC INFORMATION

A crucial component of the IPRA is public information, or keeping the public apprised of the nature and consequences of a radiological accident, both during and after. The State's role in public information is just one part of the overall public information process which includes many other sources:

- the utility;
- Federal agencies;
- county and municipal governments;
- private agencies; and
- contiguous states.

Although the State has no direct control over these other sources of information, the State will endeavor to ensure a coordinated dissemination of information.

A. Flow of Public Information

The Governor is the official spokesperson for the State of Illinois. The Office of the Governor, Springfield Press Office, maintains a staff experienced in news dissemination and media relations. The Press Office can hold press conferences in the State Capitol Radio/TV Room located in the State Capitol Building. As a backup, or in the case of very large media attendance, one of the Illinois House or Senate hearing rooms in the State Capitol will be used for press conferences. The JPIC also has space available for press conferences should the Governor choose to locate in the accident vicinity.

The Governor's staff will receive information from two primary sources. IESDA will collect and summarize information concerning the operational response of the State. IDNS will provide a technical summary of the accident and its consequences, actual and potential, upon the EPZ population and dairy animals within the ingestion exposure pathway.

Information from the site will be relayed to the State EOC and REAC via NARS.

The IESDA PIO, augmented by IIS personnel, will prepare and submit information summaries to the Office of the Governor and IDNS. The IDNS PIO, augmented by IIS personnel, will submit information summaries to the Office of the Governor and IESDA. The Office of the Governor will submit prepared news releases or news information to IESDA and IDNS for verification before dissemination. The Governor's Press Office will issue State of Illinois press releases via commercial telephone facsimile machine to the State of Illinois public information personnel at the JPIC, who will then notify public information personnel from the operating utility, contiguous states and the Federal government present at the JPIC. County

government spokespersons or State of Illinois public information personnel stationed at the county EOCs will also receive the press releases issued by the Governor's Press Office.

Information prepared for dissemination by the operating utility, contiguous states, the Federal government and affected county governments at the JPIC will be quickly relayed to the State EOC via commercial telephone facsimile machine. This information will then be given to the Governor's Press Office.

All information prepared for release by the State of Illinois, the operating utility, county and municipal governments, contiguous states and Federal agencies will be shared with all other above-mentioned parties prior to dissemination to ensure coordination.



B. Rumor Control

The State of Illinois rumor control network is designed to support affected EPZ counties and municipalities when those local governments cannot control locally-generated rumors. As rumors are generated, and especially when rumors exceed a local government's capability to provide a timely response, the State EOC will be notified of the problem.

The State rumor control network will then become operational. Dedicated telephone numbers located at the State EOC will then be announced to affected EPZ local governments. The telephone numbers are not for public dissemination.

The State rumor control network will be staffed by personnel from the IIS. As calls are received, they will be written down and the response will be incorporated into the next press briefing at the JPIC and the Governor's Radio/TV Room in Springfield.

* * * * *

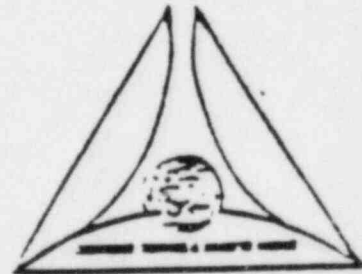
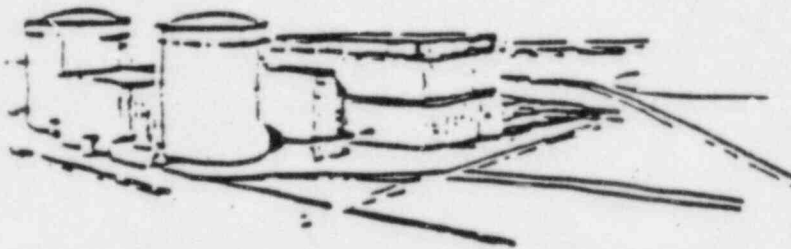
D. Media Education

To acquaint the news media with IPRA, press briefings will be held annually. The briefings will cover the following topics: Overview of IPRA, Concept of Operations, Accident Classification Scheme, Communications, Protective Actions, Parallel Actions and Public Information. In addition, the media will be given a portfolio of handouts including a map of evacuation routes, the public information booklet, an EPZ map showing population by sector and an IPRA fact sheet.

The press briefings will include presentations from the State of Illinois, the operating utility and affected counties.

The Illinois Plan
for
Radiological Accidents
(IPRA)

FOR INFORMATION ONLY



PRELIMINARY

BRAIDWOOD

Volume VII

FOR INFORMATION ONLY

ILLINOIS PLAN FOR
RADIOLOGICAL ACCIDENTS - BRAIDWOOD

CHAPTER 2
GRUNDY COUNTY BASIC PLAN
PRELIMINARY
REV. 0, 08/85

SUBMITTED:

IESDA

DATE:

07/10/85

APPROVED:

Grundy County ESDA

DATE:

07.15.85

FOR INFORMATION ONLY

K. Public Information Considerations

The methods by which the public is kept informed of the nature and consequences of a nuclear incident before, during and after such an incident have been discussed in Vol. I, Ch. 8. As one of the several sources of information to the residents of the EPZ, this section amplifies the local governments' role in providing an accurate and consistent release of information.

As Chief Executive of the STATE OF ILLINOIS, the GOVERNOR is the official spokesperson for the State emergency operations. The GOVERNOR'S staff will receive information from two primary sources, namely IESDA and IDNS. IESDA will collect and summarize information concerning the operational response of the State. IDNS will provide a technical summary of the incident and its consequences, actual and potential, upon the population near the site.

Information from the site will be relayed to the STATE EOC and the REAC via NARS and the radiological assessment direct line, both of which will have line extensions in the EOF.

Public Information Spokesperson - In GRUNDY COUNTY and each municipality therein, a spokesperson has been made responsible for public information. The spokesperson will provide timely information to the GRUNDY COUNTY ESDA COORDINATOR, or his designee, for coordination of local releases with the JPIC. The PIO at the STATE EOC coordinates State level information with the JPIC, 960 North Route 47, south of Morris, IL. This network will provide timely, coordinated information to all designated spokespersons.

Rumor Control - Rumor control will be addressed at the lowest governmental level possible. In those instances where a local government cannot control local rumors, the State rumor control network will be utilized. Personnel from IIS will operate dedicated telephone lines at the STATE EOC and at the JPIC. The State rumor control network telephone numbers will be announced to local governments in the EPZ and are not to be released to the general public. As time permits, rumors referred to the State rumor control network will be answered directly by IIS personnel. At all other times, the response to rumors will be incorporated into the next media update provided at the JPIC and the GOVERNOR'S press center in SPRINGFIELD (See Vol. I, Ch. 8).

* * * * *

Annual Press Briefings - To acquaint the news media with the IPRA-Braidwood, press briefings will be held annually. The briefing will discuss the following topics: OVERVIEW OF THE IPRA-BRAIDWOOD, CONCEPT OF OPERATIONS, ACCIDENT CLASSIFICATION SCHEME, COMMUNICATIONS NETWORK, PROTECTIVE AND PARALLEL ACTIONS and PUBLIC INFORMATION (See Vol. I, Ch. 8). In addition, the media will be given a portfolio of handouts and will be able to ask questions of the representatives of State and local governments and the utility.

FOR INFORMATION ONLY

ILLINOIS PLAN FOR RADIOLOGICAL ACCIDENTS - BRAIDWOOD

CHAPTER 3
WILL COUNTY BASIC PLAN
PRELIMINARY
REV. 0, 08/85

APPROVED: *Joseph D. Palmer* DATE: 6-28-85
WILL COUNTY ESDA
SUBMITTED: *Tom Amman* DATE: 07/10/85
ESDA

FOR INFORMATION ONLY

K. Public Information Considerations

The methods by which the public is kept informed of the nature and consequences of a nuclear incident before, during and after such an incident have been discussed in Vol. I, Ch. 8. As one of the several sources of information to the residents of the EPZ, this section amplifies the local governments' role in providing an accurate and consistent release of information.

As Chief Executive of the STATE OF ILLINOIS, the GOVERNOR is the official spokesperson for the State emergency operations. The GOVERNOR'S staff will receive information from two primary sources, namely IESDA and IDNS. IESDA will collect and summarize information concerning the operational response of the State. IDNS will provide a technical summary of the incident and its consequences, actual and potential, upon the population near the site.

Information from the site will be relayed to the STATE EOC and the REAC via NARS and the radiological assessment direct line, both of which will have line extensions in the EOF.

Public Information Spokesperson - In WILL COUNTY and each municipality therein, a spokesperson has been made responsible for public information. The spokesperson will provide timely information to the WILL COUNTY ESDA COORDINATOR, or his designee, for coordination of local releases with the JPIC. The PIO at the STATE EOC coordinates State level information with the JPIC, 960 North Route 47, south of Morris, IL. This network will provide timely, coordinated information to all designated spokespersons.

Rumor Control - Rumor control will be addressed at the lowest governmental level possible. In those instances where a local government cannot control local rumors, the State rumor control network will be utilized. Personnel from IIS will operate dedicated telephone lines at the STATE EOC and at the JPIC. The State rumor control network telephone numbers will be announced to local governments in the EPZ and are not to be released to the general public. As time permits, rumors referred to the State rumor control network will be answered directly by IIS personnel. At all other times, the response to rumors will be incorporated into the next media update provided at the JPIC and the GOVERNOR'S press center in SPRINGFIELD (See Vol. I, Ch. 8).

* * * * *

Annual Press Briefings - To acquaint the news media with the IPRA-Braidwood, press briefings will be held annually. The briefing will discuss the following topics: OVERVIEW OF THE IPRA-BRAIDWOOD, CONCEPT OF OPERATIONS, ACCIDENT CLASSIFICATION SCHEME, COMMUNICATIONS NETWORK, PROTECTIVE AND PARALLEL ACTIONS and PUBLIC INFORMATION (See Vol. I, Ch. 8). In addition, the media will be given a portfolio of handouts and will be able to ask questions of the representatives of State and local governments and the utility.

FOR INFORMATION ONLY

ILLINOIS PLAN FOR
RADIOLOGICAL ACCIDENTS - BRAIDWOOD

CHAPTER 4

KANKAKEE COUNTY BASIC PLAN

PRELIMINARY

REV. 0, 08/85

SUBMITTED:

James J. Gorman
IESDA

DATE:

07/10/85

APPROVED:

Richard M. Smith
Kankakee County ESDA

DATE:

July - 9 - 85

FOR INFORMATION ONLY

K. Public Information Considerations

The methods by which the public is kept informed of the nature and consequences of a nuclear incident before, during and after such an incident have been discussed in Vol. I, Ch. 8. As one of the several sources of information to the residents of the EPZ, this section amplifies the local governments' role in providing an accurate and consistent release of information.

As Chief Executive of the STATE OF ILLINOIS, the GOVERNOR is the official spokesperson for the State emergency operations. The GOVERNOR'S staff will receive information from two primary sources, namely IESDA and IDNS. IESDA will collect and summarize information concerning the operational response of the State. IDNS will provide a technical summary of the incident and its consequences, actual and potential, upon the population near the site.

Information from the site will be relayed to the STATE EOC and the REAC via NARS and the radiological assessment direct line, both of which will have line extensions in the EOF.

Public Information Spokesperson - In KANKAKEE COUNTY and ESSEX, a spokesperson has been made responsible for public information. The spokesperson will provide timely information to the KANKAKEE COUNTY ESDA COORDINATOR, or his designee, for coordination of local releases with the JPIC. The PIO at the STATE EOC coordinates State level information with the JPIC, 960 North Route 47, south of Morris, IL. This network will provide timely, coordinated information to all designated spokespersons.

Rumor Control - Rumor control will be addressed at the lowest governmental level possible. In those instances where a local government cannot control local rumors, the State rumor control network will be utilized. Personnel from IIS will operate dedicated telephone lines at the STATE EOC and at the JPIC. The State rumor control network telephone numbers will be announced to local governments in the EPZ and are not to be released to the general public. As time permits, rumors referred to the State rumor control network will be answered directly by IIS personnel. At all other times, the response to rumors will be incorporated into the next media update provided at the JPIC and the GOVERNOR'S press center in SPRINGFIELD (See Vol. I, Ch. 8).

* * * * *

Annual Press Briefings - To acquaint the news media with the IPRA-Braidwood, press briefings will be held annually. The briefing will discuss the following topics: OVERVIEW OF THE IPRA-BRAIDWOOD, CONCEPT OF OPERATIONS, ACCIDENT CLASSIFICATION SCHEME, COMMUNICATIONS NETWORK, PROTECTIVE AND PARALLEL ACTIONS and PUBLIC INFORMATION (See Vol. I, Ch. 8). In addition, the media will be given a portfolio of handouts and will be able to ask questions of the representatives of State and local governments and the utility.

Commonwealth Edison Company
Nuclear Stations Division



Generating Stations Emergency Plan

Controlled Copy 943

Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois, 60690
(312) 294-4321

TABLE 4.3-10

EMERGENCY NEWS CENTER DIRECTOR

The Emergency News Center Director, upon activation of the Emergency News Center Group at the EOF, is responsible for all recovery-related information intended to be conveyed from CECo to the news media.

The responsibilities of the Emergency News Center Director who reports to the EOF Recovery Manager are to:

- o Assure the operability of, and supervise the activities in the Joint Public Information Center (JPIC).
- o Effect a smooth transition of the news media point-of-contact from CCC to JPIC, and of news information responsibilities from CCC/Information Director to EOF/ENC Director.
- o Maintain the primary interface between CECo and the news media, including, as necessary, briefings, news conferences, interviews, and response to information requests.
- o Keep up-to-date on conditions of the plant and environment, and actions of CECo personnel and outside agencies.
- o Obtain approval of the Recovery Manager, or his designee of all information intended to be conveyed to the news media.
- o Coordinate with Federal, State, and local agencies, as well as with other organizations involved in the recovery, to maintain factual consistency of information to be conveyed to the news media.
- o Direct the activities of the CCC/Information Director.
- o Participate, as needed, in rumor-control activities managed by State agencies.
- o Maintain a record of GSEP-related activities.

April, 1984
Revision 4

TABLE 4.3-18

INFORMATION DIRECTOR

The Information Director is responsible for collecting, verifying, and disseminating information on emergency situations to the public via the news media, under the direction of the Intelligence Director. Upon the activation of the Recovery Group, the Information Director shall report to the Emergency News Center Director.

Responsibilities assigned to the Information Director (prior to Recovery Group activation) are to:

- o Obtain information. Through GSEP personnel, determine the nature of the emergency and its effect on the public and other company operations.
- o Release information. Take steps to release accurate information as soon as possible. Coordinate the release of information with other involved agencies and companies. The news media seeking interviews and comments from Commonwealth officials should be given full cooperation.
- o Distribute internal information. Information should be promptly disseminated to Commonwealth employees as soon as possible through appropriate communications channels.
- o Maintain a record of the GSEP related activities.

Following an EDF Recovery Group activation, the Information Director becomes a support individual to the Emergency News Center Director and shall release information only when directed by the Emergency News Center Director. The Information Director is to maintain his office in either the CCC or other appropriate CECs locations.

TSN-EOF-4
Revision 3
January, 1985

EMERGENCY PLAN IMPLEMENTING PROCEDURE

EPIP: TSN-EOF-4

TITLE: Emergency News Center Director

Prepared by:

James B. Towce

Date:

01-21-85

Reviewed by:

John F. Hogan

Date:

1/22/85

Approved by:

[Signature]

Date:

1/22/85

EMERGENCY NEWS CENTER DIRECTOR

A. PURPOSE

The purpose of this procedure is to assist the Emergency News Center Director in fulfilling the responsibilities assigned in GSEP.

B. REFERENCES

1. GSEP Table 4.3-10.
2. GSEP Table 4.3-18.
3. GSEP Telephone Directory.
4. Corporate Command Center Group Emergency Plan Implementing Procedure - EPIP CC-4 - Information Director.

C. PREREQUISITES

1. The Emergency News Center Director will ensure that an individual is available to fulfill the duties of Information Director at the CCC.

D. PRECAUTIONS

1. None

E. LIMITATIONS AND ACTIONS

Problems in Emergency News Center activation or operation beyond the control of the ENC Director should be referred immediately to the Recovery Manager.

F. PROCEDURE

1. PERFORMANCE CRITERION FOR EMERGENCY NEWS CENTER:

THE PERFORMANCE CRITERION FOR THE ENC WILL BE THE ACCURATE TRANSMITTAL OF ANY INFORMATION WITH IMPACT ON PUBLIC RISK (i.e., information serving item 1, 2, or 3 under General Objectives in Attachment X) WITHIN 15 MINUTES OF THE AVAILABILITY OF THAT INFORMATION IN THE EOF.

2. FUNCTIONAL CONCEPTS USED IN THIS PROCEDURE:

Information will exist in the EOF in three forms:

- (1) Data -- Observable or measurable facts (e.g., numbers, values, plant and equipment design details, known plant and equipment conditions, actions taken or in progress)
- (2) Intelligence -- Conclusions drawn from data; results that are deduced or projected from data analysis and are not physically apparent (e.g. event classifications, dose rate projections, risk assessments, actions under consideration)
- (3) News -- Items of Data and Intelligence selected for transmittal to the public via the public news media, translated and formatted as necessary for general understanding (e.g. news releases, information approved for discussion at news media briefings)

The ENC will actively gather Data and Intelligence from the EOF and other sources. In accordance with the General Objectives in Attachment X (Nuclear Emergency Public Information Plan), it will identify newsworthy information (NewsInfo) and validate its accuracy. NewsInfo whose accuracy has been validated will be translated and formatted into News and approved for transmittal. The ENC will transmit all News to the public via the public news media.

Transmittal of News to the public news media will occur during News Briefings. Questions, rumors, and requests for information may arise that have not been addressed in News Briefings up to that point, which the ENC will strive to address in subsequent News Briefings. Additionally, information obtained from outside sources at News Briefings will be transmitted back to the EOF.

3. ENC ORGANIZATION

- a. The ENC is supervised and controlled by the ENC Director. GSEP assigns all duties and responsibilities of the ENC to this position. The ENC Director delegates ENC duties and responsibilities to the ENC staff, with the exception of authority to approve transmittals of News regarding the emergency.

b. To achieve the General Objectives (See Attachment X), the ENC organization performs six main activities:

- (1) Data and Intelligence Assimilation
- (2) NewsInfo Identification and Validation
- (3) Newswriting
- (4) News Approval
- (5) News Transmittal
- (6) Public Inquiry Followup

c. To perform the activities necessary to satisfy the General Objectives, the ENC employs a staff with the following positions and duties:

(1) ENC Director (1 required)

- a. assigns personnel to ENC staff positions
- b. supervises activation of the ENC
- c. oversees staff activities
- d. approves News for transmittal to public via news media
- e. transmits News to CCC and CSD

(2) Information Liaison (1 required)

- a. assimilates Data and Intelligence
- b. conveys and explains information to ENC staff
- c. identifies NewsInfo
- d. validates accuracy of information to be used for News
- e. assists in preparation of News

(3) Newswriter (1 required, 2 desired)

- a. assists in startup and checkout of ENC facilities
- b. assists in identification of NewsInfo
- c. prepares News for transmittal
- d. recommends visual aids and other materials for news media briefings

(4) Spokesman (2 required)

- a. acts as Public Information Official (PIO) for the Company
- b. assists in startup and checkout of ENC facilities
- c. assists in preparation of News
- d. selects visual aids and other materials for news media briefings
- e. coordinates with other PIOs for News consistency
- f. transmits News to public via news media briefing
- g. addresses inquiries for additional information

(5) Briefing Coordinator (1 required, 2 desired)

- a. manages startup and checkout of JPIC facility
- b. oversees operation of JPIC
- c. secures visual aids and other materials for news media briefings
- d. ensures News consistency between PIOs
- e. arranges most effective sequencing of PIO announcements
- f. ensures all inquiries for additional information are addressed

4. ENC STAFFING

- a. After being called for duty, before departing for the EOF, the ENC Director initiates ENC staffing using the GSEP Telephone Directory. During normal business hours, this task may be delegated to office staff to allow earlier departure for the EOF.
- b. Outside of normal business hours, if all staff notification cannot be completed with 15 minutes of his being called for duty, the ENC Director contacts the Communications Services Duty Person (312-294-3545) and delegates notification responsibilities. In this case, upon arrival at the EOF, the ENC Director again contacts the communications Services Duty Person to obtain status and resume control of staff notification.
- c. As staff members arrive at the EOF, the ENC Director briefly reviews their duties with them and prepares for ENC activation.

5. ENC ACTIVATION

- a. The ENC Director effects ENC activation as soon as practicable following EOF activation. ENC personnel are assigned by the ENC Director to positions commensurate with their capabilities. The ENC Director advises the Recovery Manager as to when he projects the ENC will be activated.
- b. The Information Liaison introduces himself to the EOF personnel with whom he will communicate, describing his method of operation and the kinds of information he will be assimilating.
- c. The Spokesman ensures that ENC and JPIC telephones are functional, and verifies all phone numbers between ENC, CCC, and CSD. He also checks if ENC telecopiers are available, and verifies their phone numbers.

- d. The Briefing Coordinator ensures that the JPIC is physically set up and adequately equipped, including provisions for access control.
- e. The Newswriter ensures that supplies (e.g. pencils, pens, forms, stamps) are sufficient, and that the EOF clerical staff is prepared to assist the ENC (providing them a News Release format sheet and briefly reviewing their role).
- f. The ENC Director supervises these checks (See Attachment A for Checklist), and refers problems to the appropriate EOF director for resolution. When the ENC is ready for activation, the ENC Director requests approval to activate from the Recovery Manager. Upon approval, the ENC is activated, and the ENC Director notifies CSD to transmit copies of all previous emergency-related News Releases and advise the public news media to report to the JPIC.
- g. News Releases from CSD (prior to ENC activation) are copied, posted, and filed the same as ENC-generated News Releases (see subsequent sections).
- h. During the transition period between ENC activation and the first actual News Briefing at the JPIC, CSD will continue to process inquiries as before, but will be using information from News Releases transmitted from the ENC.

6. DATA AND INTELLIGENCE ASSIMILATION

- a. The Information Liaison assimilates Data and Intelligence by keeping in constant touch with source of emergency-related information. Primary information sources (those supplying the most immediate information on major developments) are used to follow the overall direction and progress of the emergency and the recovery. Other information sources provide the detail and perspective necessary to properly interpret and explain major developments.
- b. All available information sources are used to their appropriate extent and purpose:
 - (1) Announcements over the EOF address system, usually made by the Recovery Manager, are indications of important developments whose details may be obtained from other sources. Such announcements are primary information sources.

- (2) Direct discussions with EOF personnel frequently give forewarning of imminent developments, and provide detail in subject areas desired. Such discussions are primary information sources.
- (3) Status boards and displays give overall perspectives and trends for detailed information. These, however, sometimes lag the current information status by several minutes and are not relied upon as primary information sources.
- (4) Telephone contacts with technical and emergency personnel outside the EOF may provide detail on past or background information. Such communications may be used to avoid burdening EOF personnel when detailed recap or background material is desired for News.
- (5) Feedback via News Briefing from non-Emergency sources (e.g. news reports, rumors) occasionally provides information otherwise unavailable to the Company. Such external information is passed by the Information Liaison to the Recovery Manager and others as necessary.

7. NEWSINFO IDENTIFICATION AND VALIDATION

- a. The Information Liaison identifies and records NewsInfo during Data and Intelligence assimilation. The Newswriter may assist in identifying NewsInfo.
- b. Identification of NewsInfo is conducted in accordance with the General Objectives of the ENC (Attachment X). More specifically, Data or Intelligence is always NewsInfo when it represents a situation or development that significantly changes the risk posed to any segment of the public. Since assessment is required to determine risk, Intelligence is more likely than Data to qualify as NewsInfo. Data or Intelligence is likely to be NewsInfo if it represents a change in:
 - (1) Emergency classification
 - (2) meteorological or radiological conditions outside the plant
 - (3) core integrity or capability of plant equipment to maintain same
 - (4) containment integrity or capability to maintain same
 - (5) capability of plant personnel to perform their assigned duties
 - (6) radiological conditions within the plant
 - (7) understanding of the technical cause of the accident
 - (8) projections of practical consequences of the accident

c. The Information Liaison records NewsInfo on two-part carbonless forms marked "NewsInfo". The Information Liaison, the Newswriter, and the ENC Director determine when the nature, quantity, or timing of compiled NewsInfo warrants a News transmittal.

d. When a News transmittal is warranted, the Information Liaison validates the accuracy of the compiled NewsInfo by having the two-part forms reviewed and approved by the Recovery Manager or his designee. The Recovery Manager or his designee indicates approval by initialing the forms, after which the Information Liaison ensures that the date and time of approval is noted. This completes validation of the NewsInfo.

e. The Information Liaison separates the two-part carbonless forms, and immediately delivers the original (white) validated NewsInfo sheets to the Newswriter. The Information Liaison assists the Newswriter and the Spokesman as necessary to assure complete understanding of the NewsInfo. The Information Liaison then delivers the copy (yellow) validated NewsInfo sheets to the Recorder, and resumes assimilation of Data and Intelligence.

8. NEWSWRITING

a. The Newswriter organizes and translates validated NewsInfo into News under the direct supervision of the ENC Director.

b. The Information Liaison assists in this process initially, where questions of interpretation of written notes may arise. The Spokesman assists throughout Newswriting to ensure the technical fidelity of the News to the NewsInfo, and to gain the perspective needed for accurate News transmittal during the News Briefing.

c. News is produced for each transmittal in three forms:

- (1) A News Release (required) is a written statement of what the Company has to announce.
- (2) News Briefing Papers (required) are notes for the Spokesman containing News details beyond those in the News Release. These Papers are derived from, and may include, the NewsInfo sheets prepared and validated by the Information Liaison.
- (3) News Visuals (recommended) are tables, charts, graphs, diagrams, pictures, or other visual aids prepared by the ENC to help convey information to the public via the news media. They may assume any useful format (e.g. handouts, overhead projection films, wallcharts) that lends itself to rapid production with the resources available.

d. The Newswriter composes a draft News Release on three-part carbonless forms. Draft News Release format details are given in Attachment P.

9. NEWS APPROVAL AND FORMATTING

a. The draft News Release is reviewed and approved by the ENC Director, and, if he so wishes, the Recovery Manager. (NOTE: Recovery Manager approval should be waived if it introduces a delay of more than 5 minutes.) Approval is indicated by signature below the " # # # " mark on the last sheet. The ENC Director should also review the Briefing Papers to ensure that appropriate care is used in transmitting details that may lend themselves to misinterpretation by the public (e.g., he should ensure that values of radiation levels, pressures, temperatures, etc. are always given in perspective with their normal values or with some values with which the public is familiar).

b. The Newswriter gives the white originals of the approved News Release to the Spokesman for immediate transmittal to the News Media in the JPIC. He gives the yellow and pink copies to the ENC Director.

c. The ENC Director delivers the yellow copies of the approved News Release to EOF clerical personnel for typing and copying. He retains the pink copies. News Releases are typed in accordance with an approved format (Attachment R), a copy of which is given to the clerical personnel for guidance when the EOF is activated. (NOTE: For exercises, this format includes a large stamp reading "This Is A Drill - These Events Did Not Occur" positioned below the Heading and above the Text). The ENC Director proofreads the typed News Release. Sufficient copies are made to allow distribution to all news media representatives in the JPIC with extras for posting and recording.

10. NEWS TRANSMITTAL

a. The Spokesman carries the white handwritten originals of the approved News Release to the JPIC. There, the Briefing Coordinator oversees the final cross-check between the materials to be transmitted at the upcoming Briefing by the Spokesman and other Public Information Officials (PIOs). If the Briefing Coordinator identifies factual inconsistencies that cannot be resolved on-the-spot between PIOs, he will refer the issue to the ENC Director for resolution. The ENC Director will coordinate with EOF staff and/or the appropriate outside agencies (e.g. State ESDA, NRC, FEMA) to resolve the inconsistency, and return the result to the Briefing Coordinator.

- b. Based on the relative importance of the material to the public interest, the Briefing Coordinator determines the most appropriate sequence of presentation among the PIO personnel (e.g. an announcement by the State of public protective actions would always precede a simple plant status update).
- c. Immediately prior to beginning his part of the News Briefing, the Spokesman notes the time on the first page of the News Release. He begins his communication by reading the approved News Release verbatim. He then adds detail and answers questions using the News Briefing papers and News Visuals.
- d. During the News Briefing, the ENC Director contacts the CCC and Communications Services Department (CSD), and advises them that a News Release has been issued. If urgency will not allow time for typing and telecopying, he may read the News Release over the telephone from his pink copies.
- e. When copies of the typed News Release are ready, the ENC Director sends telecopies to the CCC and to CSD, and delivers an appropriate number to the Briefing Coordinator for posting and distribution in the JPIC. The ENC Director posts a copy in the EOF and delivers a copy to the Recorder.
- f. After the News Briefing, the Spokesman "cancels" his white original (handwritten) News Release with a single diagonal line from corner to corner. He returns to the EOF operations area and delivers the cancelled News Release to the ENC Director.

11. PUBLIC INQUIRY FOLLOWUP

- a. During the News Briefing, questions and requests for further information or rumor verification may arise from News Media representatives. The Spokesman (or, as appropriate, the other PIO personnel) responds with available information.
- b. When available information is not sufficient to adequately address the inquiry, the Briefing Coordinator (and, for inquiries relating to the Company, the Spokesman also) makes note of the inquiry. The inquirer is advised that his inquiry will be addressed as soon as practicable.
- c. The Briefing Coordinator ensures that inquiries are indeed ultimately addressed by continually reminding PIO personnel. For inquiries relating to the Company, the Spokesman is primarily responsible for followup.

d. Following the news Briefing, the Spokesman transmits the inquiry to the Information Liaison. The Information Liaison must actively pursue information to address the inquiry, since such information may not otherwise be of concern to EOF personnel. As soon as practicable, as part of a compilation of NewsInfo, the Information Liaison returns a response to the Spokesman and the Newswriter.

e. The Spokesman includes the inquiry response as part of the upcoming Briefing Papers. If the inquiry represented serious public misinformation (e.g. a harmful rumor), the inquiry response may be included in the News Release by the newswriter. The inquiry is then addressed at the following news Briefing.

G. CHECKLISTS

- (1) Attachment A: ENC Activation Checklist
- (2) Attachment R: News Release Format Guide
- (3) Attachment X: Emergency News Center Mission

ATTACHMENT A

ENC ACTIVATION CHECKLIST

NAME

STAFF

Information Liaison . . . _____
Newswriter. _____
Spokesman 1 _____
Spokesman 2 _____
Briefing Coordinator. . . _____

OK

FACILITIES

JPIC activated (per Briefing Coordinator). _____
Communications functional (per Spokesman). _____
- Telephones/numbers
- Telecopiers/numbers
Supplies adequate (per Newswriter) _____
- Information Forms (2-part)
- News Forms (3-part)
- Misc. (pens, pencils, stamps, etc.)

INFORMATION

Copies of prior News in hand _____
General event status update complete _____

ENC READY FOR ACTIVATION

DATE _____
TIME _____

ENC DIRECTOR

Attachment R

News Release Format Guide

On the following page is a completed News Release in the exercise format. Actual-event format would delete the disclaimer stamp.

Commonwealth Edison
Emergency Operating Facility
Mazon, IL

FOR IMMEDIATE RELEASE
Wednesday, Sept. 14, 1983
Time: 11:46 a.m.

NEWS RELEASE NO. 5

DRESDEN GENERAL EMERGENCY DOWNGRADED

**THIS IS A DRILL. THESE
EVENTS DID NOT OCCUR.**

The Dresden Station General Emergency was downgraded at 11:40 a.m. to a Site Emergency. This change in status was based on improving conditions in the Reactor Containment Building as well as a stop in the release of radiation to the environment. This has been confirmed through both field samples as well as the existing station Radiation Monitoring Equipment.

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Attachment X

Emergency News Center Mission

The nuclear Emergency News Center (ENC) will function as the primary information conduit between the Company and the general public via the public news media, during a nuclear emergency with potential public health impact.

General Objectives:

The nature, content, and timing of information transmittal by the ENC will serve, in order of priority, the following purposes:

1. to enable the public to take appropriate and timely actions to minimize risk to their lives, health, and property;
2. to reinforce and enhance efforts by federal, State, and local governmental agencies to carry out public protective measures relating to the emergency;
3. to describe and explain, in common terms, the relevant scientific concepts and technical information that will help the public accurately judge the current and potential impact of the emergency on them;
4. to prevent or dispel negative judgments as to the moral, professional, and financial integrity of the Company, by the public or by outside organizations, during and immediately following the emergency;
5. to satisfy the public's "right to know" all facts and details about events, assessments, decisions, actions, and consequences concerning the Company and the emergency.

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 Station Units 1 and 2))	

CERTIFICATE OF SERVICE

I hereby certify that copies of SUPPLEMENTAL TESTIMONY OF LAWRENCE D. BUTT RFIELD ON ROREM CONTENTION 1(a) were served by messenger on the persons identified below with a single asterik, by Federal Express on the persons identified with two asteriks and by deposit in the United States mail, first-class postage prepaid, on the remaining persons, this 22nd day of October, 1985.

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Atomic Safety and Licensing
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U.S. Nuclear Regulatory
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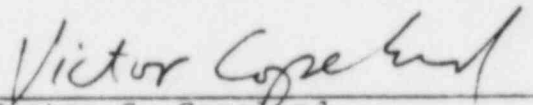
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