

APR 22 1976

Commonwealth Edison Company  
ATTN: Mr. Byron Lee, Jr.  
Vice President  
P.O. Box 767  
Chicago, Illinois 60690

(Docket No. 50-10)  
Docket No. 50-237  
Docket No. 50-249

Gentlemen:

This refers to your letter of April 2, 1976, in which you responded to concerns which we brought to your attention in our letter of March 8, 1976. We believe that additional clarification is necessary as follows:

First Aid Facilities

Please provide a description and schedule of your plans to improve the adequacy of the existing temporary first aid area during the interim period until the permanent facility is available.

Emergency Plan Implementing Procedures

Your response does not clearly address consolidation of implementing procedures (EPIP's) such that they are "complete and readily available for use", as discussed in our IE Inspection Report No. 050-010/76-03. Although Regulatory Guide 1.101, "Emergency Planning for Nuclear Power Plants", does not mention consolidation of implementing procedures, it does mention that these procedures should, however, be available for review by the Office of Inspection and Enforcement during routine inspections. We believe that all procedures necessary for the response function should be maintained together in at least a few strategic locations, rather than physically separated with cross-references between related procedures. Cross-referencing is important for identification of additional procedures to be implemented as noted in item 1.4.3 of Annex B of Regulatory Guide 1.101. Strategic consolidation of all EPIP's (no matter what their title or function is) assures that necessary procedures can be rapidly implemented, rather than searched for and then implemented.

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SURNAME →	Jorgensen/jw	Oestmann	Pagliaro	Allan	Johnson	
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- 2 -

APR 22 1976

In addition, the interrelationship between supplementary emergency procedures and Abnormal Operation Procedures, Administrative Procedures, Radiation Protection Procedures, etc. is not clear.

Please clarify your intent with respect to how you will maintain EPIP's complete and readily available for inspection and use. Also clarify the relationship of supplementary emergency procedures with other plant procedures.

Sincerely yours,

J. M. Allan, Chief  
Fuel Facility and  
Materials Safety Branch

cc: B. Stephenson  
Station Superintendent

bcc w/ltr dtd 4/2/76:

PDR

Local PDR

NSIC

TIC

Anthony Roisman, Esq., Attorney

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