



POLICY ISSUE **(Notation Vote)**

November 23, 1998

SECY-98-274

FOR: The Commissioners

FROM: William D. Travers
Executive Director for Operations

SUBJECT: COMMONWEALTH EDISON COMPANY'S PROPOSAL TO CENTRALIZE ITS
EMERGENCY OPERATIONS FACILITIES AT ITS CORPORATE OFFICES

PURPOSE:

To obtain Commission approval of the proposal by Commonwealth Edison Company to replace its four nearsite emergency operations facilities with a centralized emergency operations facility.

CATEGORY:

This paper discusses a major policy issue requiring Commission consideration.

SUMMARY:

Commonwealth Edison Company (ComEd) proposed to consolidate the four emergency operations facilities (EOFs) at its five operating nuclear power plant sites into a centralized EOF (CEOF) at its corporate offices. Commission approval is required if the EOF is to be located beyond 5 miles of the 20 miles from the site; the distances from the plant sites to the proposed central EOF would range from 32 miles (Dresden) to 116 miles (Quad Cities). For the two similar exception requests by other licensees, the Commission approved one and disapproved the other. The particular circumstances of this proposal are unique in that (1) the Commission already approved the use of the proposed facility as an Interim EOF until the nearsite EOFs can be staffed, (2) the State of Illinois and local decisionmakers do not go to the nearsite EOFs,

CONTACT: Lawrence K. Cohen, NRR
301-415-2923

and (3) the staff believes there would be an improvement in the effectiveness of ComEd's implementation of its emergency plans. While there may be a negative perception that the greater distances involved in the proposed plan would impede the licensee's ability and NRC's ability to perform their respective functions, the staff believes that technological advances in communications and monitoring capabilities, the stationing of other governmental officials remote from the sites, the proximity of NRC's Region III offices to the CEOF, and the improvement in ComEd's emergency response capability outweigh the concerns regarding the distance between the proposed CEOF and the sites. The staff is confident that this proposal will provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency. In addition, if approved, there will be resource savings for the licensee and NRC.

BACKGROUND:

In a letter dated January 5, 1995, ComEd submitted a proposal to change its emergency plan to use ComEd corporate offices as a CEOF and eliminate the four nearsite EOFs (Attachment 1). This proposal was considered by the staff only after progressive improvements were demonstrated by ComEd in its effectiveness with regard to emergency preparedness (EP).

Evolution of ComEd's Proposal: In the early 1990s, ComEd relocated its corporate Nuclear Operations Division headquarters from Chicago to Downers Grove, Illinois, where it constructed an EOF in its corporate offices designed to function like a nearsite EOF. It was licensed as a backup EOF for the Zion Nuclear Power Station. In letters dated March 31 and August 5, 1993, ComEd proposed to use the corporate offices as an Interim EOF until the affected nuclear power station's nearsite EOF would be staffed and operational (Attachments 2 and 3). The NRC staff deferred the review of the January 5, 1995, ComEd proposal to use the Interim EOF as a permanent CEOF until the Commission made its decision on the interim use proposal.

In a staff requirements memorandum (SRM) dated January 31, 1996, (Attachment 4), related to SECY-95-274, the Commission approved the Interim EOF proposal. Following that approval, the staff initiated its review of the permanent CEOF request. A number of issues needed to be resolved, including timely staffing of the CEOF, direct interactions with the State and county officials, and the effect on NRC's accident response procedures. On March 25, 1998, a meeting was held with the licensee. In that meeting, the staff requested that the licensee reaffirm its proposal in light of substantive changes that had transpired since the initial proposal was submitted including management changes at ComEd, staff reductions, and the permanent cessation of operations at Zion. In a letter dated August 7, 1998, ComEd confirmed its request for approval of its proposal to combine the four nearsite EOFs into a CEOF (Attachment 5).

ComEd's Justification: The initial impetus for many of these changes was ComEd's recognition of shortcomings in its emergency preparedness program and its need for improvement. In an NRC emergency preparedness inspection report of August 20, 1992, documenting an assessment of ComEd's corporate emergency response program, the staff noted ComEd's inability to staff its nearsite EOFs in a timely manner following the declaration of an emergency (i.e., within the 60 minutes provided in regulatory guidance) (Attachment 6). Consequently, ComEd undertook an improvement program including conducting several off-hours callout drills involving its nearsite EOF responders and performing a comprehensive survey of responder estimated travel times to assigned EOFs. These drills demonstrated that the times needed to staff the nearsite EOFs ranged from 1.5 to 3 hours. The majority of ComEd's Interim EOF responders either are based at the corporate office or can arrive at the Interim EOF quicker than they can arrive at the assigned nearsite EOF. In its proposal, ComEd stated that it can meet the 1-hour goal for staffing the Interim EOF and that it achieved this goal in numerous drills; this is a substantial improvement over the 1.5 to 3 hours determined by ComEd to be necessary to staff the nearsite EOFs (Attachment 7).

ComEd's CEOF proposal was submitted as a cost-beneficial licensing action. The licensee stated that consolidation of the nearsite EOFs will save resources. In a letter dated August 7, 1998, ComEd presented a cost analysis indicating a one-time savings of \$78,000 to \$108,500 and an annual savings of \$342,817 to \$359,168. The lower values reflect the permanent cessation of operations at the Zion facility.

ComEd's Emergency Response Strategy: ComEd's emergency response strategy involves staffing the majority of the positions at its nearsite EOFs with corporate personnel and personnel from unaffected stations. This approach to nearsite EOF staffing is a departure from industry practice, however, ComEd stated that this strategy optimizes the use of its senior managers; this strategy allows the affected station's management to focus on the onsite response while the nearsite EOF management focuses on offsite response issues. This strategy for staffing its onsite and offsite emergency response organizations influences the nearsite EOF staffing times. In its procedures, ComEd clearly states that there are no provisions or need for the EOF/CEOF Manager of Emergency Operations (MEO) to drive to the site for a face-to-face meeting with the Technical Support Center (TSC) Station Director. Therefore, ComEd asserts that when the CEOF is operational, there should not be a concern that the MEO is too far from the plant to meet face to face with the TSC Station Director.

ComEd's standard practice for EP exercises has been to pre-stage EOF responders at a location in the vicinity of the nearsite EOF and to pre-stage corporate EOF responders in a nearby room in the corporate office. Although such pre-staging of pre-selected participants is acceptable for scheduled EP exercises, it does not necessarily provide an accurate assessment of the time needed for staffing of the nearsite EOFs and the Interim EOF in an actual emergency. Consequently, in response to NRC staff concerns, ComEd developed an unannounced callout drill process to assess its effectiveness for staffing and established a repetitive performance measure.

Regulatory Issue: ComEd's proposal is a departure from the NRC regulatory guidance for acceptable methods for meeting the EP requirements of 10 C.F.R. 50.47 and Appendix E to 10 C.F.R. Part 50. In particular, the proposal is a departure from guidance on location and staffing, contained in NUREG-0696, "Functional Criteria for Emergency Response Facilities," and NUREG-0737, Supplement 1, "Clarification of TMI Action Plan Requirements (Requirements for Emergency Response Capability)."

In an SRM dated March 3, 1983, the staff was directed to refer all requests for such exceptions to the Commission (Attachment 8). The Commission directed that the referrals are to contain the proposed staff action. The Secretary reconfirmed this decision in a memorandum of April 30, 1987 (Attachment 9). In an SRM dated September 18, 1996, related to SECY-96-170, the Commission reaffirmed the requirement that it approve proposed exceptions from the guidance for locations and staffing times of EOFs, except that the staff was authorized to accept or reject exceptions to the criteria for EOF and backup EOF locations within 5 miles beyond the distance recommended in NUREG-0737 Supplement 1. For cases where the licensee proposed an exception involving a greater deviation and for all CEOF proposals, the staff is required to obtain Commission approval (Attachment 10).

DISCUSSION:

Regulations and Regulatory Guidance Documents: In 10 C.F.R. 50.47(b), the NRC delineates the standards that emergency response plans for nuclear power reactors must meet, including the following: "... (2) On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available" and "(3) ... arrangements to accommodate State and local staff at the licensee's nearsite Emergency Operations Facility have been made ..." (emphasis added). In addition,

Section IV.E of Appendix E to 10 C.F.R. Part 50 states: "Adequate provisions shall be made and described for emergency facilities and equipment, including: ... (8) A licensee onsite technical support center and a licensee nearsite emergency operations facility from which effective direction can be given and effective control can be exercised during an emergency" (emphasis added).

The Commission issued Supplement 1 to NUREG-0737 to provide NRC guidance regarding acceptable methods for meeting its EOF emergency planning requirements. Supplement 1 to NUREG-0737 specifies that (1) the EOF must be located between 10 and 20 miles from the site (a primary EOF may be located closer than 10 miles if a backup EOF is located between 10 and 20 miles from the site) and (2) Commission approval is required if the EOF is to be located more than 20 miles from the site. In Table 2, "Minimum Staffing Requirements for NRC Licensees for Nuclear Power Plant Emergencies," the 1-hour goal for the response time to staff the EOF (after an emergency has been declared) is specified and, in Section 8.4.1.b.i., the guidance stipulates that the NRC will consider reasonable exceptions to the goals for the number of additional staff personnel and response times for their arrival. Supplement 1 to NUREG-0737 specifies that the EOF will provide for the key functions of (1) management of overall licensee emergency response, (2) coordination of radiological and environmental assessment, (3) development of recommendations for public protective actions, and (4) coordination of emergency response activities with Federal, State, and local agencies.

ComEd's Corporate Generating Stations Emergency Plan (GSEP): ComEd owns and operates 10 nuclear power reactors at five sites (Braidwood, Byron, Dresden, LaSalle and Quad Cities) in Illinois. (On February 13, 1998, ComEd informed the NRC of the permanent cessation of operations at the Zion facility.) The GSEP has a station-specific annex for each site and, in its current GSEP, ComEd has four dedicated nearsite EOFs for these sites that conform to the distance criteria in Supplement 1 to NUREG-0737. The GSEP includes the use of the Interim EOF in its corporate offices until a nearsite EOF is staffed. The corporate Interim EOF is also the approved backup EOF for Zion. The corporate Interim EOF (the proposed CEOF) is located beyond the distance specified in Supplement 1 to NUREG-0737 for nearsite EOFs. Attachment 11 provides a map and table showing the location of and distances between the ComEd sites and EOFs. The attachment indicates that the distances between the proposed CEOF and the ComEd sites range from 32 miles (Dresden) to 116 miles (Quad Cities).

ComEd estimated that it would take 1.5 to 3 hours for staffing its nearsite EOFs, depending on the site involved, the availability of EOF personnel, time of day, weather and road conditions. This is based upon the results of several off-hours callout drills and a comprehensive survey of responder estimated travel times to assigned EOFs. These estimated times exceed the 1-hour EOF staffing goal specified in Supplement 1 to NUREG-0737, Table 2, and NUREG-0696, and is due, in part, to ComEd's emergency response staffing strategy.

Subsequent to the SRM dated January 31, 1996, ComEd revised its GSEP to include the use of its corporate Interim EOF (including a staffing goal set at 1 hour) as the Interim EOF for all sites until a nearsite EOF was staffed. The Interim EOF would be staffed following the declaration of an Alert or higher emergency classification. If a Site Area Emergency or a General Emergency were declared, a senior corporate EOF official would assume overall command of the ComEd response until the nearsite EOF is staffed and capable of assuming command and control responsibilities.

ComEd's Proposal: ComEd's proposal is to eliminate the nearsite EOFs and establish a CEOF at its corporate offices. ComEd's specific positions follow:

- Emergency response capabilities would be enhanced by improving the timeliness of responders to relieve their technical support center (TSC) counterparts of certain responsibilities (the CEOF could be staffed within 1 hour)

- Establishment of a CEOF would not adversely impact the capabilities of EOF staff to work with State, county, and NRC Site Team responders
- NRC's regulations and guidance do not mandate that a nearsite EOF must be equipped and available for use as a Joint Operations Center (JOC) for the Lead Federal Agency, as described in the Federal Radiological Emergency Response Plan (FRERP)
- There is no need to establish a Joint Public Information Center (JPIC) at the corporate office and no need to have a senior corporate spokesperson at the on-scene JPICs
- Establishing a CEOF in place of four nearsite EOFs would save resources.

Interim EOF Activation Timeliness: The strategy to create an Interim EOF significantly improved ComEd's staffing timeliness and there has been an evident improvement in staffing timeliness since 1996. Historically, prior to using the Interim EOF, the nearsite EOFs were not fully staffed for up to 3 hours. With the use of the Interim EOF, activation times decreased, approaching the 1-hour goal. On September 18, 1995, before the approval of the Interim EOF, a Region III inspector stationed at the corporate Interim EOF observed a successful, off-hours, unannounced callout drill. Subsequently, between September 1995 and January 1997, ComEd conducted 10 callout drills using a computer-based callout system (Voice Recognition Unit or VRU); only 3 were fully successful (Attachment 12).

During an actual emergency event that occurred on May 10, 1996, the staffing of the Interim EOF was unsatisfactory. In the early morning hours of May 10, 1996, a tornado caused damage at the Quad Cities Station. In accordance with procedures, an Alert was declared and the onsite response facilities and the Interim EOF were activated. Minimum staffing of the Interim EOF, as defined in the emergency plan, was not achieved until 98 minutes after the Alert declaration, 38 minutes beyond the 60-minute goal for staffing the Interim EOF.

To improve performance and reliability, ComEd embarked on a series of initiatives to improve the notification and callout of emergency responders and to meet the 1-hour goal for activation of the Interim EOF. ComEd installed new systems and protocols to solve its notification and callout problems. In July 1997, ComEd switched to the Community Alert Network (CAN), which is a contractor-provided, automated callout service based in Nevada and New York. This is the system that is presently in use. However, in several drills in the summer of 1997, ComEd was unable to lower the staffing times to meet the 1-hour goal. Additional changes were made to improve communications, including improved training. In February 1998, communication drills were conducted on a weekly frequency to improve the callout times. Out of seven CAN drills, four were fully successful and three achieved staffing times between 67 to 84 minutes.

In April 1998, ComEd implemented a new process to achieve consistent EOF staffing times of under 1 hour. It developed a new system using pagers and dedicated response teams. ComEd conducted four weekly off-hour drills to test the system. Three drills were fully successful. The fourth test was indeterminate because of recording discrepancies for one member of the response team. As part of a commitment to NRC, on May 14, 1998, ComEd conducted a successful actual drive-in drill in which the response team actually drove in to the CEOF from their homes. Minimum staffing occurred within 40 minutes of the classification time.

In its August 7, 1998, submittal, ComEd strengthened its commitment to timely activation. ComEd formally committed to minimum staffing of the Interim EOF within 1 hour at the Alert emergency classification. (NRC guidance calls for staffing the EOF at the Site Area Emergency.) Previously, ComEd's GSEP only stated that it had a goal to activate the Interim EOF in 1 hour. In addition, ComEd also committed to conducting unannounced, off-hours, drive-in callout drills every 6 months until it has achieved three consecutive successful drills.

After three consecutive successful drills are achieved, ComEd would reduce the drill frequency to once every 6 years.

On August 4, 1998, at 4:13 a.m. (CDT), an Unusual Event was declared at the Byron Station. Although not required, ComEd elected to implement the EOF activation procedure; it took 68 minutes to activate the Interim EOF. Consequently, ComEd will continue to drill on a frequent basis until it achieves 3 consecutive Interim EOF activations within 60 minutes.

Unique Site-Specific Considerations: NRC's EOF requirements envisioned that the EOF would serve as the location for the licensee, State and local agency representatives to meet face-to-face, allowing TSC staff to concentrate on onsite issues and mitigative actions. In light of the State and county agencies' plans for responding to emergencies at ComEd sites and the unique capabilities of the Illinois Department of Nuclear Safety (IDNS), this is not an issue for the ComEd proposal.

With respect to ComEd's situation, State and county emergency response organizations operate from their own emergency centers and do not send decisionmakers to the nearsite EOFs. This approved arrangement has been in effect for more than 10 years. Coordination and interaction with the licensee take place by telephone and computerized communications. The three States (Illinois, Wisconsin, and Iowa) within one or more of the ComEd sites' 10-mile emergency planning zones reviewed ComEd's proposal and agreed that the strategy is compatible with their approved emergency plans (included in Attachment 1). IDNS stated that as long as adequate information flow, cooperative assessment, and decisionmaking are achieved, a centralized EOF should not impede effective emergency response. Federal Emergency Management Agency (FEMA) Region V staff reviewed ComEd's proposal and indicated that it will have no impact on offsite preparedness (included in Attachment 1).

In addition, IDNS maintains a computerized data link to the ComEd nuclear stations that provides real-time access to hundreds of plant parameters whether or not an emergency is declared. IDNS has independent vent stack monitors and a network of radiation detection instruments around each ComEd nuclear station. IDNS also maintains a resident engineer at each ComEd nuclear station, who would report to the onsite TSC.

Impact on NRC's Incident Response and NRC Resources: Commission approval of a CEOF at ComEd's corporate office would not be consistent with longstanding Commission policy, as reflected in NUREG-0728 and -0845 and other more recent NRC publications, that the lead for NRC's incident response should be on-scene during an emergency. Although the NRC resident inspector for the affected site would be augmented by several other NRC Site Team representatives in the onsite emergency response facilities, the majority of the NRC Site Team, including the Director of Site Operations (DSO) and many key aides, would be located at the proposed CEOF rather than on-scene. ComEd indicated that pre-designated office space for NRC Site Team representatives in each nearsite EOF would remain available, if needed by NRC, and ComEd would provide any needed communications equipment.

In response to anticipated concerns about a "remote EOF" concept, ComEd raised the issue of using the nearsite EOF as a Joint Operations Center (JOC) for Federal agencies to save Federal resources. Neither the memorandum of understanding between NRC and FEMA concerning the FRERP or NRC regulations require that a licensee convert or allow the nearsite EOF to become a JOC. Also, it has been suggested that NRC could establish the JOC either at FRMAC (Federal Radiological Emergency Monitoring and Analysis Center) or at FEMA's Disaster Field Office.

If the Commission approves ComEd's proposal, the NRC's DSO could appoint another manager to serve as a senior NRC spokesperson at a nearsite JPIC. However, this could separate two key NRC managers for the purpose of a press conference. ComEd's procedures

call for its key staff at the JPIC to be technically knowledgeable of the plant and plant conditions. The key staff would be available to interface with the NRC if communications links to the proposed CEOF were unsatisfactory. However, the "remote" location of the senior NRC decisionmaker from the site may create an appearance of "NRC remoteness" that may not be desired. In addition, should the Chairman, President, other elected representatives, or other decisionmakers go to the site, it is likely that the senior NRC manager would be required for support. This could take the senior NRC manager more than one hundred miles from the licensee's senior decisionmaker. These impediments must be weighed in the context of the benefits realized by a more timely response during the earliest stages of an emergency.

The proposed CEOF is about 15 minutes away from the NRC Region III office by automobile. Such proximity will simplify the deployment of the EOF component of an NRC Site Team to the CEOF. If the proposal is approved, NRC Site Team counterpart space and communications provisions may need to be refined. Staffing for the onsite component of an NRC Site Team should also be reassessed to include an onsite NRC manager to augment the resident inspectors and several other on-scene NRC responders, at a minimum.

ComEd Resource Savings: Although the JPICs for all but the Zion facility would remain in the same buildings as the EOFs, ComEd expects to achieve an initial one-time savings of \$78,000 to \$108,500 and an annual savings of up to \$359,168 by eliminating its four nearsite EOFs.

Alternate CEOF: The staff raised a concern about the likelihood that the proposed CEOF at ComEd's corporate office could become unavailable because of the effects of an earthquake or a tornado, an outage of communications equipment, or a security event. There is also a very small likelihood that an event at another facility could affect availability. ComEd stated that, if the CEOF became unavailable for use, the CEOF responsibilities could be transferred to the TSC at one of its unaffected nuclear stations. Although ComEd indicates that it has no immediate plans to modify its TSCs with respect to training, staffing and layout to formalize the use of a TSC as an alternative to the CEOF, the staff believes that the proposed transfer approach is feasible without affecting public health and safety because the TSC responders at the other sites have had training similar to that received by the EOF responders in the CEOF.

Previous Commission Decisions: The Commission has approved five exceptions to its EOF location policy, where the licensee proposed to locate the EOF outside the 20-mile radius from the nuclear power plant. Generally, these exceptions involved locating the proposed EOF a few miles beyond the 20-mile criterion. There is limited experience for locating the EOF at a distance of the order of 100 miles from the nuclear power plant. The Commission considered two emergency plans that proposed a CEOF where the location significantly exceeded the distance criteria in Supplement 1 to NUREG-0737; as discussed below, in one case the Commission approved the proposal, while it disapproved the proposal in the second case.

In early 1981, the Commission approved the Tennessee Valley Authority (TVA) plan to locate the EOF for its nuclear power plant sites beyond the distance which was later specified in NRC guidance, Supplement 1 to NUREG-0737, issued in 1982 (Attachment 13). The TVA emergency plan specifies the use of a CEOF, which is located approximately 104 miles from TVA's Browns Ferry nuclear plant, with accommodations near each plant for an NRC Site Team. In 1995, Watts Bar Station was licensed. Watts Bar also utilizes the TVA CEOF, which is located approximately 50 miles from the site; the location of the CEOF relative to the Watts Bar site was not explicitly addressed in the licensing action. Region II's experience through inspections and exercise observations confirms that the remote EOF concept is feasible and can afford reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

The Commission disapproved an exception to the guidelines for locating the EOF for the Oconee Nuclear Station (Attachment 14). Duke Power Company, licensee for Oconee,

proposed to use a CEOF located 125 miles from the Oconee site. The staff recommended that the Commission disapprove the Oconee proposal because the principal EOF management staff could not interact directly (face-to-face) with its Federal, State, and local counterparts located near the plant site (Attachment 15). In addition, the Oconee plan did not contain provisions for staffing a nearsite EOF. The Commission approved the staff's recommendation. A contrary outcome would be reached here if the Commission approves the current proposal. However, in this situation, a unique circumstance exists since other governmental decisionmakers, at their own election, will not be located near the plant site.

STAFF EVALUATION OF PROPOSAL:

The Commission's regulations require reactor licensees to provide a "nearsite" EOF, 10 C.F.R. § 50.47(b)(3) and 10 C.F.R. Part 50, Appendix E, § IV.E. The term "nearsite" is not defined in the regulations, and Commission guidance has not clarified the meaning of this term except that Supplement 1 to NUREG-0737 indicates that EOFs may be approved by the staff without Commission involvement up to 20 miles from a reactor site, and the Commission may approve EOFs located beyond that distance. In view of the lack of a clear definition of the term "nearsite," and the Commission's approval of the CEOF for TVA's sites, an exemption from the Commission's regulations does not appear to be required.

In NUREG-0696, the Commission described the importance of the EOF as follows: "When the EOF is activated, the functions of providing overall emergency response management, monitoring and assessing radiological effluent and the environs, making offsite dose projections, providing recommendations to State and local officials, and coordinating with Federal officials will shift to the EOF," (NUREG-0696 at 5). With respect to the location of the EOF, NUREG-0696 states:

The location of the EOF, and whether a backup facility is required, should consider the following factors:

Whether the location provides optimum functional and availability characteristics for carrying out the licensee functions specified for the EOF (i.e., overall strategic direction of licensee onsite and support operations, determination of public protective actions to be recommended by the licensee to offsite officials, and coordination of the licensee with Federal, State, and local organizations).

Whether the EOF functions would be interrupted during radiation releases for which it was necessary to recommend protective actions for the public to offsite officials.

It is strongly recommended that the EOF location be coordinated with State and local authorities to improve the relationship between the licensee and offsite organizations. *Id.* at 17-18. *Accord*, Supplement 1 to NUREG-0737, at 22, § 8.4.1.a.

In an early decision concerning the importance of an EOF, the Commission emphasized the importance of face-to-face communications among decisionmakers, stating as follows:

[T]he EOF is the ideal place for face-to-face communications regarding protective action recommendations between Federal, State and local officials, and the licensee official charged with making the recommendation to the [State]. The Commission does not believe ... that telephonic communications between the governmental officials in the

EOF and the licensee's decisionmaker in the control room provide an equivalent opportunity for an exchange of information. The Commission views the opportunity for face-to-face communications as the best means to exchange pertinent information between Government officials and the licensee and to formulate protective action recommendations, particularly when it is essential that there not be misunderstandings between those involved. *Metropolitan Edison Co.* (Three Mile Island Nuclear Station, Unit No. 1), CLI-83-22, 18 NRC 299, 308 (1983).

The Commission further stated that the EOF "... is where State, local and Federal officials will congregate to exchange information." *Id.* at 309. The Commission similarly emphasized the importance of face-to-face contact among decisionmakers at the EOF in denying Duke Power Company's proposed CEOF for Oconee, as the Court of Appeals noted in finding that the Commission acted within its discretion in denying that proposal. See *Duke Power Co. v. NRC*, 770 F.2d 386, 390-91 (4th Cir. 1985).

The Commission's prior emphasis on the importance of a nearsite EOF in facilitating face-to-face communications does not appear to apply with equal force in the situation presented by ComEd's proposal, as discussed below.

ComEd proposes to use a CEOF, located from 32 to 116 miles from an affected site and staffed within 1 hour of an Alert or higher emergency classification, as an alternative to that specified in NRC's guidance. ComEd's proposal is a departure from the NRC guidance that a nearsite EOF is to be located within 20 miles of the site. With the exception of the location of the CEOF, the CEOF meets all of the staff requirements.

ComEd's proposal provides for performance of all the key EOF functions. The functional capabilities of the CEOF were considered previously and accepted by the staff in approving the facility as the Interim EOF and Zion Backup EOF. NRC inspections of the exercises conducted while the licensee was using the CEOF confirms its functional capabilities.

The existing CEOF has emergency response capabilities (data collection, dose assessment, and communications equipment) similar to those of nearsite EOFs with the exception of FTS-2000 communications lines. NRC would be responsible for installing the lines for the FTS-2000 system. However, NRC would maintain only one system rather than four systems. It is estimated that NRC would save \$10,000 per year if this proposal was approved.

ComEd's commitment is to have the CEOF staffed within about 1 hour of an emergency declaration (Alert or higher) to relieve the TSC staff of responsibilities for offsite interfaces if a Site Area Emergency or a General Emergency is declared. ComEd would staff the CEOF following the declaration of an Alert with the positions equivalent to the staffing plan (minimum staff of 8 and full staff of 13) for the currently approved Interim EOF. The remainder of the CEOF staff would be activated following the declaration of a Site Area Emergency or a General Emergency. Staffing of the CEOF at the Alert level exceeds the guidance of Supplement 1 to NUREG-0737 and increases the overall timeliness of ComEd's emergency preparedness.

The arguments and facts presented by ComEd in its proposal and subsequent correspondence, as well as the results and findings of NRC inspections and events that have ensued since ComEd first proposed the CEOF concept indicate that it would likely provide an increase in effectiveness of emergency preparedness for ComEd. ComEd stated (and the staff agrees) that the CEOF can generally perform the required functions of an EOF in terms of coordinating offsite activities associated with an accident, as envisioned in the regulations and guidance discussed above, and from the lessons learned from Three Mile Island.

With respect to the State and local agencies, the issue of the distance for the EOF is not relevant in this situation since these agencies do not send decisionmakers to the nearsite EOF. The State of Illinois has an effective program, and maintains its own inspectors in the plant with direct data links to the licensee's computers. NRC inspectors, over the years, have verified that the EOF staff functions and performs the role of coordinating and directing offsite activities associated with an incident even though decisionmakers from the State and local support agencies are not present in the EOF. On the basis of these considerations, the staff has concluded that, in this situation, the distance between the site and the proposed CEOF would not affect the licensee's performance. However, there could be a negative public perception: that the licensee cannot respond to an accident and the NRC Site Team cannot provide effective oversight, from a distance of more than 100 miles from the site. This perception can be addressed by accurately presenting the facts to the public.

ComEd has had problems in timely activation of the Interim EOF as demonstrated in callout drills and in an actual event (the tornado at Quad Cities in May 1995). However, ComEd has taken substantial steps and instituted new programs to solve this problem. ComEd has made a strong corporate commitment to make its proposal work. The results of recent drills show continued improvement in staffing times compared to earlier drills. The licensee has committed to revise the language in the emergency plan to commit to the activation of the proposed CEOF in 1 hour after the declaration of an Alert or higher emergency classification. The main issues remaining are the reliability of ComEd's callout systems and the continuous demonstration of timely activation of the proposed CEOF.

ISSUE:

The issue is whether to permit ComEd to eliminate the four nearsite EOFs in favor of one CEOF.

OPTIONS:**(1) The Commission could reject the proposal.**Pro:

- would maintain consistency with NRC policy in effect since 1982
- would avoid the possibility of additional proposals from other licensees in similar situations
- would not affect the NRC's and Federal planning for deploying on-scene responders

Con:

- Rejection of the proposal would send a negative message to the State and county officials that NRC does not approve of remote decisionmaking
- no resource savings would be realized for ComEd by eliminating four nearsite EOFs
- ComEd would continue to have to transfer responsibilities from the Interim EOF to the nearsite EOF
- would dilute the licensee's pool of senior managers available to fill key emergency response positions

- no resource savings would be realized for NRC by eliminating three sets of FTS-2000 lines

(2) The Commission could accept the proposal.

Pro:

- rapid deployment of the NRC Site Team due to the close proximity of the regional office to the proposed CEOF
- resource savings realized for ComEd by eliminating four near-site EOFs
- would eliminate the transfer of responsibilities from the Interim EOF to the near-site EOF
- resource savings would be realized for NRC by eliminating three sets of FTS-2000 lines

Con:

- potential negative public perception of lack of near/onsite response
- possible influx of proposals from other licensees in similar situations
- would require a modification to NRC planning for deployment of site team personnel
- could require FEMA and/or NRC to reevaluate the expectation that a licensee's nearsite EOF is the optimum location for the Lead Federal Agency's JOC rather than an on-scene, Federally - managed response facility such as FEMA's Disaster Field Office or a FRMAC

CONCLUSION AND RECOMMENDATION:

The ComEd proposal constitutes a departure from the EOF location criteria in Supplement 1 to NUREG-0737. The CEOF meets all the functional as well as the physical requirements (i.e. communications, space, and visual information displays) for EOFs as identified in various agency documents. Conditional upon ComEd's commitments and plan of action, it is expected that the licensee will meet the NRC guidance for timely staffing of the EOF, a goal that has eluded this licensee for years. Commission approval of the proposal will also eliminate the additional step of transferring responsibility for command and control from the currently approved Interim EOF to the nearsite EOF. The ComEd proposal maximizes the use of senior managers to fill key onsite and offsite emergency response positions. Adoption of this proposal will save resources for both the NRC and ComEd.

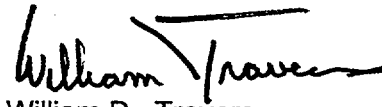
The acceptance of ComEd's proposal by State and county officials responsible for taking protective measures to protect the health and safety of the populations within the ComEd sites' 10-mile emergency planning zones is a significant factor. Decisionmakers remain in their respective centers and are not sent to the EOFs. The acceptance of this approach relies, at least in part, on the existence of the unique IDNS capability to independently monitor plant radiological effluent conditions, including real-time access to hundreds of other plant parameters.

ComEd's proposal impacts the NRC's policy that the DSO from the NRC Site Team should be on-scene during an emergency and affects the NRC's planning for Site Team deployment for the site EOFs. However, the NRC Site Team deployment to the proposed CEOF should be more effective because the CEOF is accessible in 15 minutes by car from the Region III offices. The total effect on the NRC resources is expected to be minimal.

The staff recommends that Option 2 should be adopted.

COORDINATION:

The Office of the General Counsel has reviewed this paper and has no legal objection. The Office of the Chief Financial Officer has reviewed this Commission paper for resource implications and has no objection. The Office of the Chief Information Officer has no objections to the information implications contained in this paper.



William D. Travers
Executive Director
for Operations

- Attachments:
1. ComEd letter re: Proposal for Centralized EOF, dated January 5, 1995
 2. Emergency Plan Changes, dated March 31, 1993
 3. ComEd Response to Staff RAI re: Emergency Plan Changes, dated August 5, 1993
 4. Staff Requirements Memorandum, related to SECY-95-274, dated January 31, 1996
 5. ComEd letter re: Updated Proposal for CEOF, dated August 7, 1998
 6. NRC EP Inspection Report, dated August 20, 1992
 7. ComEd Response to Staff RAI, dated September 17, 1993
 8. Staff Requirements Memorandum, related to Commission Meeting (M830302B), dated March 3, 1983
 9. SECY Memorandum re: SECY-87-067, dated April 30, 1987
 10. Staff Requirements Memorandum, related to SECY-96-170, dated September 18, 1996; and SECY-96-170, dated August 5, 1996
 11. Map Showing Locations of ComEd Reactor Sites and nearsite EOFs
 12. ComEd Letter re: Results of Drills, dated February 27, 1997
 13. SECY Memorandum, related to TVA EOFs, dated January 21, 1981
 14. SECY Memorandum, related to SECY-84-089/089A, dated June 12, 1984
 15. SECY-84-089, dated February 22, 1984.

Commissioners' completed vote sheets/comments should be provided directly to SECY by COB Friday, December 11, 1998. Commission staff office comments, if any, should be submitted to the Commissioners NLT December 4, 1998, with an information copy to SECY. If the paper is of such a nature that it requires additional review and comment, the Commissioners and the Secretariat should be apprised of when comments may be expected.

DISTRIBUTION:

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ATTACHMENTS TO COMMISSION PAPER

ON

**COMMONWEALTH EDISON COMPANY'S PROPOSAL TO CENTRALIZE ITS
EMERGENCY OPERATIONS FACILITIES AT ITS CORPORATE OFFICES**

ATTACHMENTS:

1. ComEd letter Requesting Central EOF, January 5, 1995
2. Emergency Plan Changes, March 31, 1993
3. ComEd Response to Staff RAI re: Emergency Plan Changes, August 5, 1993
4. Staff Requirements Memo, January 31, 1996
5. ComEd letter, August 7, 1998
6. Staff EP Inspection Report, August 20, 1992
7. ComEd Response to Staff RAI, September 17, 1993
8. Staff Requirements Memorandum, March 3, 1983
9. Internal Memorandum re: Oconee, April 30, 1987
10. Staff Requirements Memo, SECY-96-170, September 18, 1996; and
SECY-96-170, August 5, 1996
11. Map Showing Locations of ComEd Reactor Sites and nearsite EOFs
12. ComEd Letter re: Results of Drills, February 27, 1997
13. Commission Memo re:TVA EOFs, January 21, 1981
14. Commission Memo re: Oconee, June 12, 1984
15. SECY-84-89 re: Oconee, February 22, 1984



Commonwealth Edison
1400 Opus Place
Downers Grove Illinois 60515

January 5, 1995

Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

1-4 Attention: Document Control Desk

Subject: Braidwood Station Units 1 and 2
Byron Station Units 1 and 2
Dresden Station Units 1,2, and 3
LaSalle County Station Units 1 and 2
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2

Commonwealth Edison Submittal: Proposal to Consolidate Near-Site
Emergency Operations Facilities (EOFs) into a Single Central EOF

NRC Dockets 50-454 and 50-455
NRC Dockets 50-456 and 50-457
NRC Dockets 50-10, 50-237 and 50-249
NRC Dockets 50-373 and 50-374
NRC Dockets 50-254 and 50-265
NRC Dockets 50-295 and 50-304

- Reference:
- 1) Teleconference on July 20, 1994; with Messrs. R. Emch, G. Dick, F. Cantor, and J. McCormick-Barger
 - 2) Meeting between NRC and Commonwealth Edison, October 19, 1994, on Central Emergency Operations Facility (EOF)
 - 3) NUREG-0737, Supplement 1; "Clarification of TMI Action Plan Requirements," dated January 1983.

Pursuant to our telephone call (Reference 1) and meeting with NRC staff (Reference 2), Commonwealth Edison (ComEd) requests the Nuclear Regulatory Commission (NRC) to review and approve the consolidation of our four (4) near-site Emergency Operations Facilities (EOFs) and the Corporate Emergency Operations Facility (CEOF) into one single, central EOF. For the purposes of this submittal the concept of a single, central EOF will be referred to as a "central EOF," to distinguish it from the Corporate EOF (CEOF).

January 5, 1995

ComEd further requests that this proposal be reviewed as a Cost Beneficial Licensing Action (CBLA) because of the substantial current and future savings ComEd will realize, an initial one-time savings of approximately \$250,000 and estimated annual savings of at least \$300,000.

The Corporate EOF, located in our Nuclear Operations Division Headquarters in Downers Grove, Illinois, will serve as the central EOF. This facility is licensed as the Backup EOF for Zion Station. It is similar in capabilities to our near-site EOFs, with the exception of the ENS and HPN lines, which could be added, if desired by the NRC staff. (A further description of the central EOF facility is included in the Attachments to this letter.)

ComEd is not consolidating our Joint Public Information Centers (JPICs). They will remain at their current locations in order to provide a near-site facility for State, Federal, local and utility representatives where information can be provided to the media.

ComEd has also taken into account the need to maintain effective communications with the state and local governments. Therefore, the proposed use of a central EOF has been discussed with appropriate State and local agencies. Letters of support have been received from these agencies (copies enclosed). There will be no change in information flow between these agencies and ComEd as a result of adopting a central EOF concept. The State agencies do not send decision makers to any of the EOFs; only State liaisons are sent who relay information back to the State Emergency Operations Centers. The counties do not send anyone to the EOF and therefore the central EOF concept will not impact them. FEMA Regions V and VII have also reviewed the impact of the proposed central EOF and have no objections.

This proposal is being submitted in accordance with NUREG-0737 (Supplement 1), Section 8.4.1.b (Reference 3) which requires specific approval by the Commission if an EOF is to be located beyond 20 miles from a station. This facility will be a fully staffed EOF and will be capable of assuming all the functions of the EOF described in Reference 3. Pursuant to 10 CFR 50.54(q), these changes do not decrease the effectiveness of the Emergency Plan.

Further supporting documentation for this request is provided in the following Attachments:

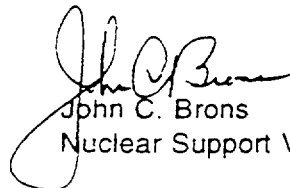
- Attachment A: Basis for Request
- Attachment B: Considerations as a Cost Beneficial Licensing Action
- Attachment C: State and Local Governmental Agency Considerations

The proposed Emergency Plan change will be submitted in the first quarter of 1995, and will be implemented within six (6) months after approval by the NRC Commissioners.

January 5, 1995

ComEd would like to meet with the NRC staff to discuss the merits of this CBLA submittal at their earliest convenience. Please feel free to contact D.L. Farrar at (708) 663-2094 or I. M. Johnson at (708) 663-2096 to further discuss this matter.

Sincerely,



John C. Brons
Nuclear Support Vice-President

Attachments

cc: J. Martin, Regional Administrator-RIII
R. Capra, NRR
G. Dick, NRR
E. Imbro, NRR
S. Dupont, Senior Resident Inspector (Braidwood)
H. Peterson, Senior Resident Inspector (Byron)
M. Leach, Senior Resident Inspector (Dresden)
P. Brochman, Senior Resident Inspector (LaSalle)
C. Miller, Senior Resident Inspector (Quad Cities)
R. Roton, Senior Resident Inspector (Zion)
R. Wight, I.D.N.S.

ATTACHMENT A

BASIS FOR REQUEST

Commonwealth Edison (ComEd) requests the Nuclear Regulatory Commission's review and approval of the consolidation of its four (4) near-site Emergency Operations Facilities (EOFs) and the Corporate Emergency Operations Facility (CEOF) into one central EOF. Per NUREG-0737, Supplement 1 (Reference 3) use of the central EOF as an EOF for all of our stations will require NRC Commissioner approval since this location is beyond twenty (20) miles from any of our nuclear stations. ComEd is not consolidating its current Joint Public Information Centers (JPICs). They will remain at their current locations in order to provide a near-site facility for State, Federal, local and utility representatives to provide information to the local media. This request is being submitted as a Cost Beneficial Licensing Action (CBLA). Attachment B provides the basis for consideration as a CBLA request.

The central EOF will utilize a full EOF staff, the same as that currently provided to a near-site EOF. The proposed facility is licensed as the Backup EOF for Zion Station and is being used as an interim EOF under current Emergency Plans. "Minimum Staff"[†] to the central EOF will be available within the 60 minute "goal" in NUREG-0737, Supplement 1 (Reference 3).

The central EOF will be located in our Corporate Nuclear Operations Division Headquarters which is in Downers Grove, Illinois. Depending on the station, the facility is approximately a 1 to 3 hour drive from a given station. Table 1 provides the direct line distance of the central EOF to each of the stations. ComEd will provide provisions for the NRC Site Team in the central EOF (located approximately three (3) miles from the NRC Region III offices). NUREG-0737, Supplement 1 (Reference 3), provides that for EOFs beyond twenty (20) miles, some provisions for the NRC Site Team closer to the site will be expected. ComEd will make provisions for the NRC Site Team closer to the station, if the NRC deems it necessary.

ComEd's emergency response philosophy will remain unchanged. Since ComEd staffs the EOF with corporate and unaffected station personnel, increasing the distance between the station and the EOF does not negatively impact ComEd's ability to provide response personnel to an EOF in a timely manner. In effect, the proposed location of the central EOF is closer to a large number of ComEd Nuclear Operations personnel and will improve ComEd's ability to more promptly staff the facility. There will be no change in information flow between the EOF and the stations, or between the EOF and State(s) or local agencies. Attachment C contains more information regarding state and local agency considerations.

†

"Minimum Staff" delineates those positions necessary for the EOF to perform the functions of an EOF required by NUREG-0737, Supplement 1 (Reference 3). The following positions constitute "Minimum Staff": 1) Manager of Emergency Operations, 2) Technical Support Manager, 3) one other member of the Technical Group, 4) Advisory Support Manager, 5) Emergency Planner, 6) Protective Measures Director, 7) Environmental Emergency Coordinator, and 8) ODCS Specialist.

ATTACHMENT A

The central EOF facility is equivalent to our current "near-site" EOFs, with the exception that there are currently no FTS-2000 (ENS or HPN communication) lines. ComEd is willing to provide for the installation of these lines. (Table 2 provides a Facility Space Comparison between a typical near-site EOF and the proposed central EOF. Attachment D provides the floor plan of the proposed central EOF.)

ComEd has reviewed the emergency plan to evaluate if the use of a central EOF would adversely impact any benefits associated with the current near-site EOF locations and has determined that there are no significant negative impacts.

Use of a central EOF will not reduce the effectiveness, and in the following ways, will serve to improve the effectiveness of ComEd's Emergency Preparedness Plan:

- 1) Providing prompt "Minimum Staff" (estimated to be within 15 - 30 minutes) to the central EOF, during normal working hours because of the number (approximately 50) of qualified "Minimum Staff" Offsite Responders typically located at the Downers Grove offices. (A total of approximately 80 qualified EOF responders are typically located at the Downers Grove offices. These individuals would be able to provide a prompt response to the central EOF during normal working hours.);
- 2) Providing more readily available support from various corporate support organizations which are located at the Downers Grove offices, such as: the Probabilistic Risk Assessment Group, the Emergency Preparedness Department, Radiation Protection Department, Licensing Department, Nuclear Fuel Services (core design and analysis) department (scheduled to relocate to Downers Grove on January 16, 1995) and other Engineering Support departments;
- 3) Enhancing the ability of ComEd senior Nuclear Operations Division management to quickly respond by locating the off-site Emergency Response Organization in the same building as their offices;
- 4) Providing a facility that is closer to a larger percentage of ComEd's Nuclear Operations personnel, enabling a larger number of personnel to respond (during off-hours activations) to the EOF within a shorter period of time;
- 5) Increasing the floor space in the EOF for ComEd, State and Federal responders (Table 2);
- 6) Reducing the susceptibility of the EOF to potential near-site problems such as, restricted travel through or around Emergency Planning Zones (EPZs) and local phone system overloads;

ATTACHMENT A

- 7) Reallocating financial resources, which would otherwise be expended for maintaining/upgrading the four (4) EOFs (Mazon, Morrison, Dixon and Zion), into one central EOF and back into the Station programs where the money has a more direct bearing on safety;
- 8) Providing additional benefits due to location, such as; proximity to NRC Region III offices (approximately 3 miles), ease of accessibility (close to both O'Hare and Midway Airports and close to major Interstate highways (I-88, I-290, I-55, I-294 and I-355)), and higher concentration of nearby support resources (local telephone exchange capability, hotels, food services, transportation, etc.).

In consideration of previous requests, made by other utilities, for consolidation of EOFs into a single EOF, ComEd provides the following in support of their unique situation:

- 1) ComEd operates six (6) nuclear stations (12 units) which are widely distributed across Northern Illinois; and
- 2) ComEd has a large amount of resources readily available to respond to an emergency event at any one of its nuclear stations; and
- 3) The central EOF concept is in line with ComEd's longstanding emergency response philosophy of minimizing the impact on the affected station by using personnel from unaffected stations and the corporate offices, rather than using personnel from the affected station (ie., affected station personnel are designated to respond to their onsite emergency facilities allowing them to focus on returning the plant to a safe condition, while non-station personnel are called upon to address and coordinate the offsite aspects of the event); and
- 4) States do not send "Decision Makers" to the EOF; they send liaisons who relate information back to the State Emergency Operations Centers (EOCs). The States direct their activities from State EOCs, in their respective State Capitols (also located greater than twenty (20) miles from any of ComEd's nuclear stations); and
- 5) Counties do not send anyone to the EOF; they direct their activities from county EOCs in their respective counties; ComEd and states send liaisons to the county EOCs; and
- 6) The State of Illinois has designated a permanent agency, the Illinois Department of Nuclear Safety (IDNS), which has it's own extensive unique monitoring and analysis systems; they receive plant status directly from the stations which input into their Reactor Analysts computer programs; they have in-stack effluent monitors that are capable of monitoring for particulate, iodine and noble gas releases from the stations; and they also have gamma monitors around each of the stations that provide them with real time radiation readings within the Emergency Planning Zone (EPZ); and

ATTACHMENT A

- 7) IDNS currently has Resident Inspectors at Braidwood, LaSalle, Quad Cities, Zion, and Dresden stations (they are in the process of hiring a Resident Inspector for Byron); these individuals report to and remain at the TSC once it is activated and serve as an information/communication path back to IDNS; and
- 8) ComEd has provided dedicated direct conference lines between the EOF and the decision makers of the states of Illinois and Iowa, and another line between the EOF and the decision makers of the States of Illinois and Wisconsin; and
- 9) The proposed location for the central EOF is in close proximity (approximately 3 miles) to NRC Region III offices; and
- 10) The proposed location for the central EOF is already approved as the Backup EOF for Zion Station (The facility has been demonstrated in its capacity as backup EOF, with a full EOF staff, once with the State of Illinois during the LaSalle 1992 Exercise and during the Zion 1994 Exercise.); and
- 11) In utilizing a central EOF, ComEd would rely on a remote JPIC, the same in practice as what currently exists for Zion Station. The practice of using a remote JPIC has been demonstrated as effective over the years as shown by Zion Station during numerous Exercises, including the Federal Field Exercise in 1987.

ATTACHMENT A

TABLE 1

STRAIGHT LINE DISTANCE FROM THE STATIONS

<u>STATION</u>	<u>CENTRAL EOF</u>	<u>NEAR-SITE EOF</u>
Dresden	32 miles	10 miles
Braidwood	40 miles	10 miles
Zion	45 miles	0.5 miles
LaSalle	48 miles	10 miles
Byron	66 miles	20 miles
Quad Cities	116 miles	18 miles

ATTACHMENT A

TABLE 2

FACILITY SPACE COMPARISON

AREA	TYPICAL ComEd EOF*	DOWNERS GROVE EOF**
Main Area	4510 sq. ft.	6440 sq.ft.
NRC Area	440 sq. ft.	725 sq. ft.
State Area	400 sq. ft.	870 sq. ft.
TOTAL	5350 sq. ft.	8035 sq. ft.

* Approximate. Does not include kitchen, washrooms, or library.

** Approximate. Does not include kitchen, washrooms, library, or scenario development room. Additional non-dedicated space within the same building could be made readily available. Floor plan included as Attachment D.

ATTACHMENT B

CONSIDERATION AS A COST BENEFIT LICENSING ACTION (CBLA)

ComEd believes that this request meets the NRC's criteria for consideration as a CBLA. This submittal provides a basis for the conclusion that the proposed central EOF will not adversely impact safety. In fact, the use of a central EOF can enhance safety by improving ComEd's emergency response while providing a significant cost savings. ComEd has prioritized this request with respect to its other pending licensing actions and has concluded that prompt attention is warranted. This proposal is applicable to ComEd's six (6) nuclear stations.

ComEd will realize substantial current and future savings by the consolidation of its four (4) EOFs and CEOF, into a single central EOF.

A central EOF will provide a one time, initial savings of approximately \$250,000. This savings is based on equipment that can be used elsewhere or sold. As an example:

- The central EOF at Downers Grove will free up 23 personal computers (PCs) and 8 laser printers and one local area network (LAN) server from its existing EOFs, which can be redeployed throughout the company. This is a savings to the company of \$52,000, based on a cost of \$1500 per PC, \$1000 per printer and \$10,000 for a LAN server.
- Redeploying the existing Audio Visual equipment in the EOFs throughout the company should save the company \$200,000 in avoided expense.

Annual savings of approximately \$300,000 will result from reduced communications cost, reduced labor for facility surveillance and maintenance, and reduced labor for document control. For example:

- Based on actual telephone charges, the central EOF in Downers Grove will save approximately \$99,700 in telephone costs each year. This savings results from a reduction in the number of telephone lines serving the existing EOFs as well as removing special circuits, such as the state and local notification circuit and automatic ringing lines from the near-site EOFs.
- Reduction in the number of microwave channels will result in a savings of approximately \$120,000.
- The central EOF will annually save approximately 34 person-days of station management time from the communications drills since station personnel will not need to travel to the near-site EOFs.

ATTACHMENT B

- One less Corporate Emergency Preparedness management staff person would be needed due to the reduced facility surveillance requirements associated with having only one (1) EOF instead of five (5).
- Since the existing EOF at Downers Grove already has all of the manuals needed for GSEP emergency response, and as JPICs need fewer manuals, both in number and type, there would be a savings of approximately 108 person-days per year of station clerical time from updating manuals.

Future savings will be achieved when desired or necessary upgrades of the EOF or its equipment are made. Upgrades such as the change-out of computer systems or technological obsolescence of equipment are often necessary and are dictated by changes made to equipment at the stations. In these cases ComEd will save approximately 80% of the costs to make such changes. As an example, equipment changes that presently cost \$100,000 to make, will be reduced to \$20,000. In addition, changes can be made in a shorter period. This will reduce the time in which response capability may be degraded by such modifications. Labor cost to manage and complete future upgrades will also be reduced by a similar proportion. Examples of potential future savings include:

- The state and local notification system (called NARS for Nuclear Accident Reporting System) is aging and will need to be replaced in the next decade. While the replacement system hasn't been designed, clearly four (4) fewer locations will be less costly. Based on the cost to install a new NARS site with the current system, ComEd can avoid \$10,000 per site or \$40,000.
- ComEd is currently planning to replace the single rear screen projection video display in the Executive Management Center with four 37 inch video monitors. This replacement is estimated as at least \$25,000 per EOF or \$125,000. It will only cost \$25,000 to replace the rear screen projector at the central EOF at Downers Grove.
- Personal computers and printers would need to be replaced about every five years due to technical obsolescence. This averages out to \$10,000 per year of avoided costs.

ATTACHMENT C

STATE AND LOCAL AGENCY CONSIDERATIONS

In years of conducting Exercises with the State(s) and counties, including a Federal Field Exercise in 1987, it has been demonstrated that face-to-face communications are not necessary for the purposes of decision making. Each State Emergency Response Plan dictates that the State and county decision makers respond to their respective Emergency Operations Centers (EOCs). Therefore there is no face-to-face communication between State and ComEd decision makers under current response plans. Decision makers rely on telephone and data communications between the EOF and State EOC, and between the State EOC and County EOC(s). The State(s) send liaisons to the EOF, and ComEd sends liaisons to the state and county EOCs. These liaisons exchange information between facilities, they do not make any decisions with regard to the information that they obtain. Experience has shown that ComEd has developed an effective decision making relationship with the State(s) based on various non-face-to-face communication systems and a keen understanding of each of our responsibilities in the decision making process.

Attachment A provides further examples where ComEd's interaction with state and county agencies is unique.

ComEd has notified and discussed the proposed use of a central EOF located in Downers Grove, IL with the appropriate (within the 10 mile emergency planning zone) State (Illinois, Wisconsin and Iowa) and county (Grundy, Will, Kankakee, LaSalle, Kendall, Ogle, Lake, Kenosha, Rock Island, Whiteside, Scott, and Clinton) agencies. The States and counties have confirmed by letter that they support this concept. Copies of their responses are enclosed. ComEd also requested FEMA Regions V and VII to review the offsite emergency plans to evaluate the impact of changing to single, central EOF. They have indicated that they have no concerns. Copies of their responses are also enclosed.

ATTACHMENT C

STATE AND COUNTY SUPPORT LETTERS



Illinois Emergency Management Agency

110 East Adams • Springfield, Illinois • 62706

(217) 782-7860

September 7, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

The Illinois Emergency Management Agency supports the concept of a Central Emergency Operations Facility (EOF). With both public and private organizations trying to reduce costs while maintaining a certain level of preparedness, it is logical to take such a step. In addition, we see no negative impact on the coordination of activities between CECO and State officials related to the utilization of a Central EOF.

If you have any questions, please do not hesitate to call me.

Sincerely,

A handwritten signature in cursive script that reads "David L. Smith".

David L. Smith
Chief, Division of Field Services

DLS:jmb

cc: Rex Coble



State of Wisconsin

DEPARTMENT OF MILITARY AFFAIRS
Division of Emergency Government

DATE: September 8, 1994

2400 WRIGHT STREET
P.O. BOX 7865
MADISON, WISCONSIN 53707-7865
TELEPHONE (608) 242-3232
FACSIMILE (608) 242-3247
24-HOUR EMERGENCY HOTLINE
1-800-943-0003

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
3400 Opus Place
Downers Grove, Illinois 60515-1108

Dear Mr. Scott:

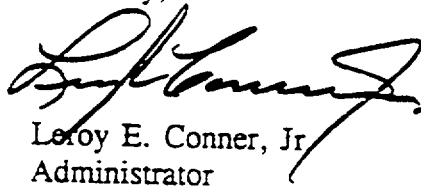
Wisconsin is supportive of ComEd's concept of a Central Emergency Operations Facility (EOF) located in Downers Grove, Illinois.

It is our understanding from conversations, with Mr. T. Blackmon of your staff, that placement of the EOF in Downers Grove will provide the utility with the benefit of the EOF being outside the 10-mile EPZs for all plants. The placement will also provide the utility with the capability to activate in a more timely manner and thus provide the States and Counties with information more quickly. Transfer of Control Room, TSC, CEOF, and EOF communications to offsite agencies will be reduced and we have been assured that the level and content of information being transferred will not be reduced. Prompt notification and Protective Action Recommendations will be provided in the same timeframes.

Any effect on the State of Wisconsin and Kenosha County should be administrative only.

Please keep Wisconsin informed of your efforts and if you require further information or assistance please contact Garrett Nielsen (608-242-3240) or Marcia Smith (608-242-3241).

Sincerely,



Leroy E. Conner, Jr.
Administrator

cc: Paul Schmidt, DHSS-RPU
Terry Blackmon, ComEd
Chris Bacon, DEG



TERRY E. BRANSTAD, GOVERNOR

DEPARTMENT OF PUBLIC DEFENSE
EMERGENCY MANAGEMENT DIVISION
ELLEN M. GORDON, ADMINISTRATOR

October 7, 1994

114
Mr. Douglas J. Scott, Dir.
Emergency Preparedness & State Programs
Commonwealth Edison Co.
1400 Opus Place
Downers Grove, IL 60515

Dear Doug:

The State of Iowa does not object to the proposal concept of a Central Emergency Operations Facility located in Downers Grove, as is your current Corporate EOF. During our full scale rehearsals and evaluated exercises, we will of course want to continue sending our Iowa EMD liaisons to the Centralized EOF if the proposal is approved and implemented. We have also discussed this with Don Flater and Don's concerns went to the time of deployment and the perhaps increased cost of sending his technical liaisons to the Centralized EOF.

I and Don both retain the commitment to send our respective liaisons to a Commonwealth EOF whether it remains in Morrison or is centralized in Downers Grove, for all of our full scale rehearsals and exercises and if the proposal is implemented, we would of course make the appropriate arrangements for transportation for both liaisons groups which would function as well during a real emergency.

Let us know how your proposal fares with the NRC and if you would care to discuss it further, please contact Rick Bamsey.

Sincerely,

Ellen M. Gordon
Administrator

bjd

cc: Don Flater, IDPH
Terry Blackmon, CECO
Rick Bamsey, EMD
RERP Staff

STATE OF ILLINOIS
DEPARTMENT OF NUCLEAR SAFETY

1035 OUTER PARK DRIVE
SPRINGFIELD, ILLINOIS 62704

Jim Edgar
Governor

217-785-9900
217-782-6133 (TDD)

Thomas W. Ortziger
Director

September 16, 1994

Mr. Doug Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

The Illinois Department of Nuclear Safety (IDNS) has considered your letter regarding the concept of a central Emergency Operations Facility (EOF) at Downers Grove. It is our opinion that as long as adequate information flow and cooperative assessment and decisionmaking are achieved, a central EOF should present no barrier to effective emergency response. We are therefore pleased to support the concept. We request that you provide us a copy of your submittal to NRC so that we can examine the details of your proposal and determine the impact on IDNS plans and programs.

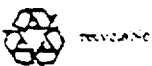
Sincerely,



Roy R. Wight, Manager
Office of Nuclear Facility Safety

RRW:AJP:tlk

cc: Dave Smith, IEMA



Grundy County
Emergency Services & Disaster Agency

Nuclear Planning Division

1320 Union Street - Room E-01

Morris, IL 60450-2426

Telephone: 815/941-3212 Telefax: 815/941-3456

November 4, 1994

Mr. Douglas J. Scott
ComEd Emergency Preparedness Director
1400 Opus Place
Downers Grove, IL 60515

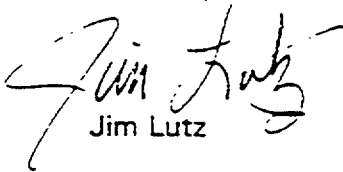
Dear Mr. Scott:

Regarding the ComEd proposal to operate a single, central Emergency Operations Facility that would be associated with the Downers Grove Corporate Offices, I believe that the concept makes good sense.

As a County that is impacted by the Emergency Planning Zones of the Braidwood, Dresden, and LaSalle Stations, my view is that at the very worst case such a move would be undetectable to our operation. I suspect, by having the EOF associated with the Corporate Office, the time that it would take to be operational would be reduced. Additionally, the corporate staff would provide the EOF with expanded resources for both the company and off-site response organizations.

Therefore, I see the concept of a single central EOF as a very positive and beneficial move for the emergency operations community.

Sincerely,



Jim Lutz

JL/dpd



DONALD B. GOULD
Director

WILL COUNTY OFFICE OF EMERGENCY MANAGEMENT

302 NORTH CHICAGO STREET
JOLIET, ILLINOIS 62431-1059
815-740-8351 - OFFICE
815-740-0911 - 24 HR. EMERGENCY
815-723-8895 - TELEFAX

November 22, 1994

Mr. Doug Scott,
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

Will County has received the proposed request for a single, central Emergency Operations Facility. This facility will be located at the Downers Grove Office.

Will County has no objections to the proposed move, as it should not affect their operations or public information that is given at the present time. We support Commonwealth Edison efforts to improve efficiency while not lessening the emergency planning efforts.

If you have any questions or need additional information regarding this response, please contact me at 815/740-8351.

Sincerely,

Donald Gould
Donald Gould, CEM
Director



*This grade meets or exceeds government
standards for recycled grades*



**LaSalle County
Emergency Services and Disaster Agency**

NOVEMBER 12, 1994

MR. TERRY BLACKMAN
GOV. AFFAIRS SUPERVISOR
1700 OPUS PLACE, SUITE 500
DOWNERS GROVE, IL 60515

RE: CENTRAL EOF

DEAR TERRY:

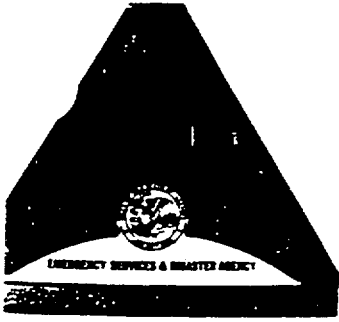
THIS IS IN RESPONSE TO YOUR LETTER DATED NOVEMBER 1,
1994 REGARDING THE SINGLE CENTRAL EMERGENCY OPERATIONS
FACILITY (EOF).

LASALLE COUNTY SUPPORTS COMED'S REQUEST TO USE A SINGLE
CENTRAL EOF IN PLACE OF THE VARIOUS EOF'S. WE APPLAUD
COMED'S EFFORT IN REDUCING THE COST ASSOCIATED WITH
MAINTAINING THESE FACILITIES. WE ALSO FEEL THAT A
CENTRAL EOF WILL HAVE NO IMPACT ON EMERGENCY OPERATIONS.

PLEASE LET US KNOW IF YOU REQUIRE ANY ADDITIONAL
INFORMATION.

SINCERELY,

EMERSON TIDD
LASALLE COUNTY
ESDA COORDINATOR



KANKAKEE COUNTY EMERGENCY SERVICES & DISASTER AGENCY

470 EAST MERCHANT STREET • ROOM 104
KANKAKEE, ILLINOIS 60901
815/937-3929

GENE M. CAVINS
DIRECTOR

Mr. Douglas J. Scott
Emergency Preparedness Director
1400 Opus Place
Downers Grove, Illinois 60515

Dear Mr. Scott:

Regarding your request to The Nuclear Regulatory Commission (NRC) to use a single, central Emergency Operations Facility (EOF), I feel this will not cause any problems at all to The Kankakee County ESDA operation. I fully support your submittal to the (NRC) Nuclear Regulatory Commission.

Sincerely,

Gene M. Cavins
Kankakee County ESDA Director



OFFICE OF THE SHERIFF

KENDALL COUNTY

708-553-7500

1102 CORNELL LANE • YORKVILLE, IL 60580-9597



NOVEMBER 28, 1994

COMMONWEALTH EDISION
ATT: DOUGLAS SCOTT
EMERGENCY PREPAREDNESS
1400 OPUS PLACE
DOWNERS GROVE, IL. 60515

DEAR MR. SCOTT,

I AM RESPONDING TO YOUR LETTER OF NOVEMBER 1, 1994, REGARDING COMMONWEALTH EDISON'S REQUEST TO THE NUCLEAR REGULATORY COMMISSION (NRC) TO UTILIZE A SINGLE, CENTRAL EMERGENCY OPERATIONS FACILITY.

AS SHERIFF OF KENDALL COUNTY, I SUPPORT THIS CONCEPT FOR A SINGLE, CENTRAL EMERGENCY OPERATIONS FACILITY, FOR THE POINTS YOU HAVE GIVEN. NOT ONLY IN THE COST SAVINGS, BUT IN AN EFFORT TO HAVE MORE TIMELY AND ACCURATE INFORMATION IN DISSEMINATION OUT TO AGENCIES REQUIRED TO RESPOND OR TAKE ACTIONS, DURING INCIDENTS. FURTHERMORE, UTILIZING TECHNOLOGY NOT ONLY IN BEING EFFICIENT, BUT EFFECTIVE, RESULTING IN POSITIVE RESPONSES TO THE POTENTIAL DANGEROUS SITUATIONS. I FEEL THIS IS AN APPROPRIATE MOVE TO IMPROVE THE QUALITY OF THE SYSTEM THAT IS IN PLACE AND MAKE IT WORK FOR ALL EMERGENCY RESPONDERS.

IF THERE IS ANY OTHER INFORMATION YOU WOULD LIKE FROM ME, PLEASE DO NOT HESITATE TO CALL OR WRITE.

VERY TRULY YOURS,


SHERIFF RICHARD A. RANDALL
KENDALL COUNTY SHERIFF'S OFFICE

SHERIFF
Melvin C. Messer



CHIEF DEPUTY
Richard L. Wilkinson

ADMINISTRATION
& ENFORCEMENT
103 Jefferson Street
815-732-6666

OFFICE OF THE SHERIFF
OF OGLE COUNTY
Oregon, Illinois 61061

CORRECTIONS DIVISION
WARRANTS & CIVIL PROCESS
Fifth & Jefferson
815-732-2135

November 21, 1994

Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott,

In response to your letter dated November 1, 1994, please be advised that the Ogle County ESDA is in agreement with a central Emergency Operations Facility to be located in Downers Grove, IL.

With this EOF located in Downers Grove, we are proceeding with the understanding that the JPIC will remain in Dixon for our County.

Your continued support and cooperation is greatly appreciated.

Sincerely,

Melvin C. Messer
Ogle County Sheriff

MCM:rs

Clinton O. Grinnell
Sheriff

Gary Del Re
Undersheriff



OFFICE OF SHERIFF
DEPARTMENT OF EMERGENCY SERVICES

1303 North Milwaukee Ave.
Libertyville, IL 60048

Captain Thomas Gardner
County Coordinator
708/549-5230

November 4, 1994

Mr. Terry Blackmon
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Blackmon,

This letter is in response to your proposal to the Nuclear Regulatory Commission for a single, central Emergency Operations Facility.

I would like to go on record in support of your proposal. It seems to me that combining all your E.O.F.'s would be a more manageable, cost effective, and efficient way of addressing the Emergency Operations Facility's function, as it relates to my department's responsibilities under the Illinois Plan for Radiological Accidents.

I have always been curious as to why the Zion E.O.F. was located so close to the Zion Station. I've always thought it should at least be located outside the 10 mile emergency planning zone. In addition, it is irrelevant to me in the County's Emergency Operations Center whether we are talking to you in Zion or in Downers Grove, getting the information we need. I would also think that in a real incident the chances of telephones becoming unusable due to consumer overload would be far greater with the E.O.F. being in Zion as opposed to Downers Grove.

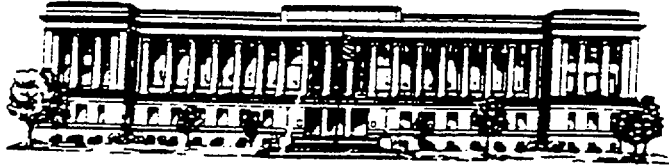
In closing, if I can be of any further assistance in this matter don't hesitate to contact me.

Sincerely,

Capt. Thomas W. Gardner
Lake County Emergency Services Coordinator

TWG:ek
comed941

County of Kenosha



ESTABLISHED
1850

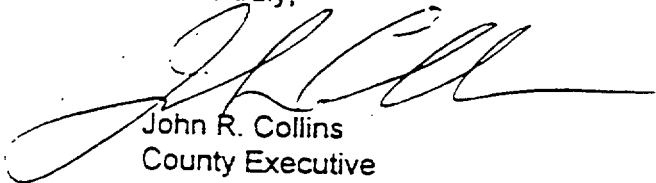
November 29, 1994

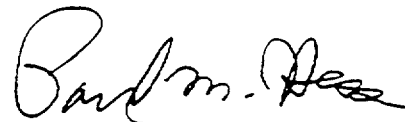
Mr. Terry Blackmon
Governmental Affairs & Facilities
Emergency Preparedness & State Programs
Commonwealth Edison Company
1400 Opus Place
Downers Grove, IL 60515

Dear Terry:

Kenosha County is in agreement with Commonwealth Edison's decision to establish a central EOF for its nuclear plants. We believe it will not hamper the emergency response efforts of Commonwealth Edison; it may, in fact, prove to be a benefit by moving the EOF out of the ten-mile EPZ.

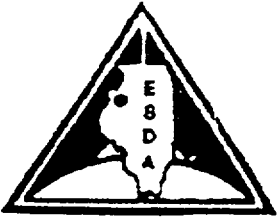
Yours truly,


John R. Collins
County Executive


Paul M. Hess
Emergency Services Director

/gew

John R. Collins County Executive



**Emergency Services And Disaster Agency
Rock Island County Illinois**

6120 78th Avenue
Milan, Illinois 61264
(309) 799-5166

November 4, 1994

Mr. Terry Blackman
Commonwealth Edison Co.
Nuclear Regulatory Service
Emergency Preparedness
1400 Opus Place
Downers Grove, IL 60515

Dear Sir

I have read the document by Douglas J. Scott dated November 1, 1994.

The planned use of a single, Central Emergency Operation Facility (EOF) would not in anyway affect the operation of our facility. The combining of facilities seems to be a most prudent direction in which to proceed for savings and possible efficiency. I do not see any drawbacks or negatives to this plan.

I wish you well in this pursuit.

Sincerely,

Dave DeBarre,
R.I.Co. ESDA Director

WHITESIDE COUNTY E.S.D.A.

400 North Cherr
Morrison, IL 61
Tele 815/772-2800



EMERGENCY SERVICES AND DISASTER AGENCY



November 21, 1994

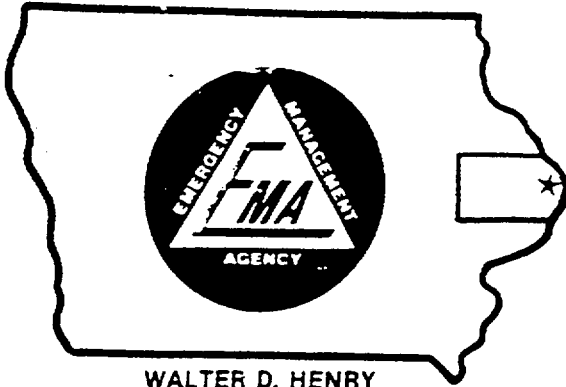
Mr. Terry Blackman
Governmental Affairs &
Facilities Supervisor
Emergency Preparedness
1400 Opus Place, Suite 500
Downers Grove, IL 60515

Dear Mr. Blackman,

In reference to your letter dated November 1, 1994, reference Commonwealth Edison centralizing their Emergency Operating Facility (EOF). We see no reason why the closing of the EOF in Morrison would have any negative effect on our operations in Whiteside County. The reasons stated for this action certainly make sense.

Sincerely,

Ron Hanson
Whiteside County ESDA Coordinator



WALTER D. HENRY
COORDINATOR

CLINTON COUNTY
EMERGENCY MANAGEMENT
CLINTON COUNTY LAW ENFORCEMENT CENTER
P.O. BOX 2957
CLINTON, IOWA 52733-2957
PHONE: (319) 242-5712

November 8, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place 5th Floor
Downers Grove, IL 60515

Dear Mr. Scott:

I have received your letter dated November 1, 1994 with regard to the centralization of a single Emergency Operations Facility, and have given consideration to the proposition.

I have conducted inquiries within Clinton County among those persons having a responsible role in supporting the Radiological Emergency Response Plan for the Quad Cities Nuclear Power Station, and have determined support exists for your proposal.

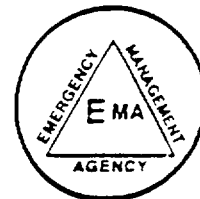
Please approach the NRC with your recommendation, confident with the support of Clinton County.

Sincerely,

Walter D. Henry
Coordinator

WDH:SR

SCOTT COUNTY
EMERGENCY MANAGEMENT AGENCY
416 West 4 Street
Davenport IA 52801-1187
(319) 326-8663 FAX (319)322-2848



Bud Whitfield
Director

November 10, 1994

Serving...
Bettendorf
Blue Grass
Buffalo
Davenport
Dixon
Donahue
Eldridge
LeClaire
Long Grove
Maysville
McCausland
New Liberty
Panorama Park
Pleasant Valley
Princeton
Riverdale
Walcott

Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

RE: Your letter of November 1, 1994, consolidation of EOF facilities

Proximity to the EOF is not an issue for Scott County. We would have no objections to moving the facility to Downers Grove.

Sincerely,

Bud Whitfield, Director
Scott County Emergency Management Agency

BW/lj



Federal Emergency Management Agency
Region V
175 West Jackson Blvd, 4th Floor
Chicago, IL 60604

November 7, 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

Dear Mr. Scott:

Thank you for your letter of November 2, 1994, regarding your proposal for a single, central Emergency Operations Facility (EOF). We reviewed the accompanying package and the responses of the States of Illinois, Iowa, and Wisconsin. We also reviewed the FEMA National Office response concerning your interim EOF operation.

The critical mission of the EOF in relation to offsite preparedness is the ability to monitor and communicate plant status and conditions, and make protective action recommendations (PAR) to offsite authorities. The Downers Grove facility has a computer network tie-in to the power stations, a node of the Nuclear Accident Reporting System (NARS) dedicated telephone, and the corporate decision-makers already in place. This capability is the key to the performance of the missions shown above.

In conclusion, we do not find that offsite preparedness would be adversely affected by a single, centrally-located EOF. In fact, it is possible that the consolidation of the EOF function at a single site may improve your interaction with offsite authorities.

Please contact Clay Spangenberg at (312) 408-5531 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry L. Bailey". The signature is written in a cursive style.

Larry L. Bailey
Deputy Director, Preparedness,
Training and Exercises Division

cc:
FEMA Region VII
FEMA National Office
IEMA



Federal Emergency Management Agency

Region VII

911 Walnut Street, Room 300
Kansas City, MO 64106

NOV 30 1994

Mr. Douglas J. Scott
Emergency Preparedness Director
Commonwealth Edison
Nuclear Regulatory Services
Emergency Preparedness & State Programs
1400 Opus Place
Downers Grove, IL 60515

Dear Mr. Scott:

SUBJECT: Proposed Central Emergency Operations Facility

We have completed a review of your proposal for a central Emergency Operations Facility (EOF) to be located in Downers Grove, Illinois. We also reviewed the responses from the State of Iowa and FEMA Region V and the FEMA National Office response concerning interim EOF operations.

Based on the above responses, our review of the offsite plans, and a tour of the proposed facility, it is our judgement that the proposed EOF contains more than adequate communications and computer capabilities to ensure that the critical EOF mission is performed as it applies to offsite authorities. It would serve as an acceptable facility to allow utility decision-makers to make appropriate protective action recommendations to offsite authorities. We do not believe that offsite preparedness would suffer any adverse effects from consolidation to a central EOF facility.

If you have any questions, please contact Norman Valentine at (816) 283-7017 or Jane Young at (816) 283-7020.

Sincerely,

Robert G. Bissell

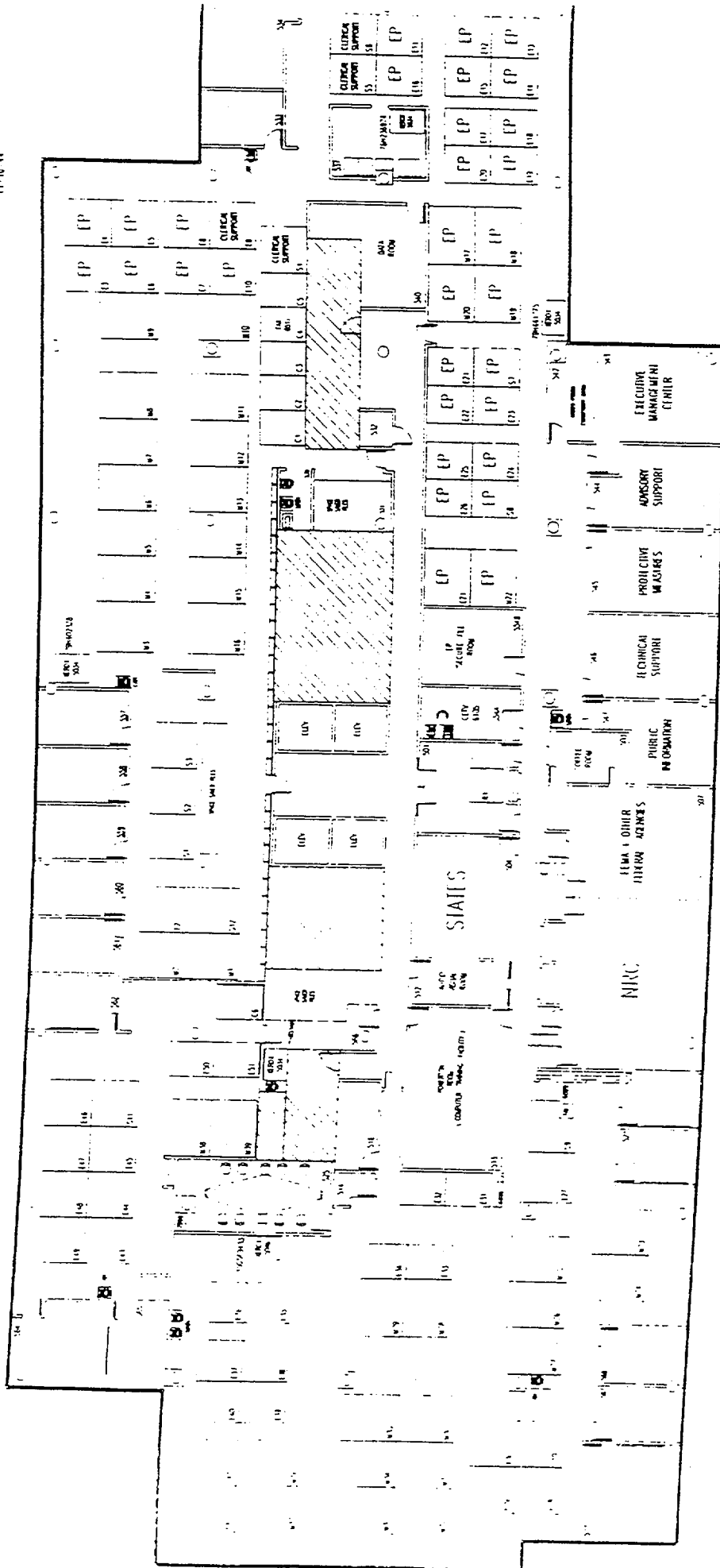
Robert G. Bissell, RAC Chairman/Chief
Training, Exercises, & Evaluation Branch

cc: Kathryn Cole, PT-EX-RG
Lawrence Bailey, FEMA V
Roland Lickus, NRC III

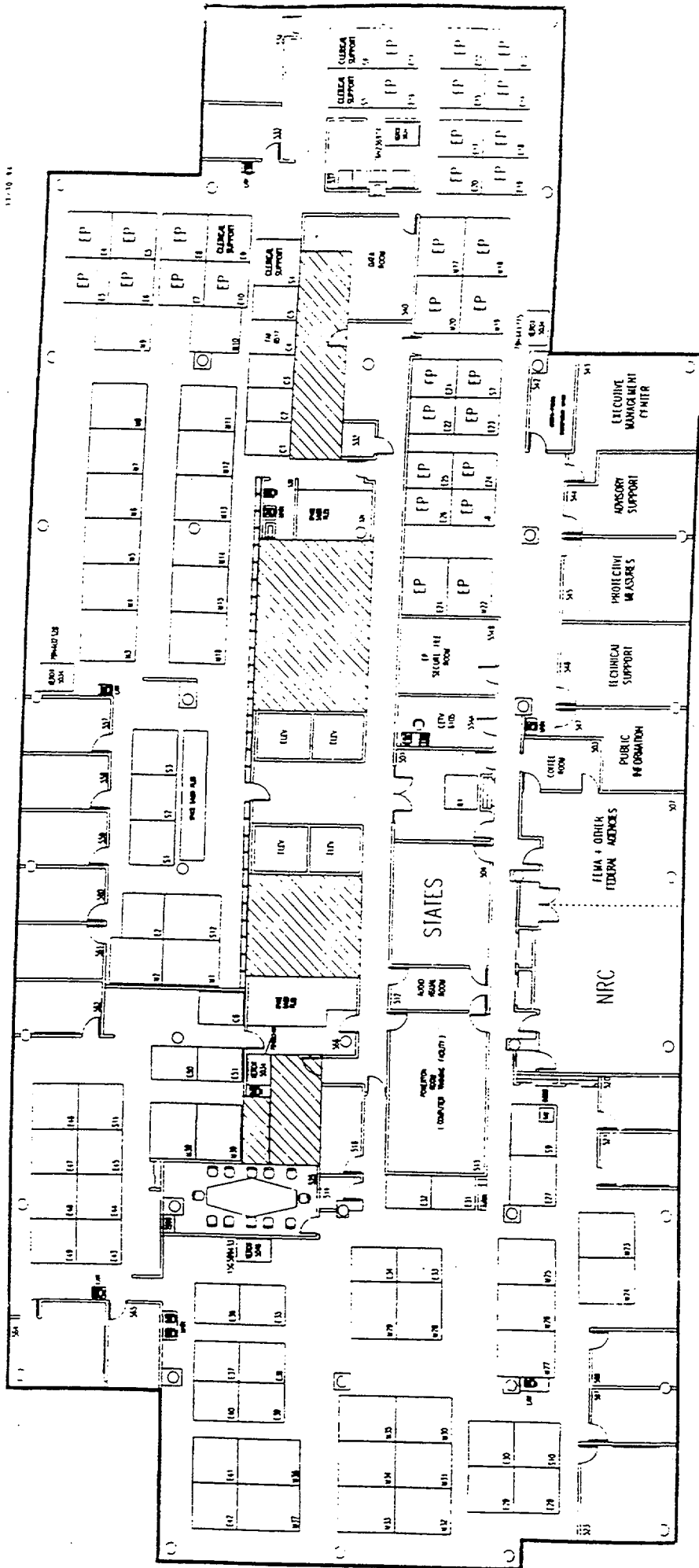
ATTACHMENT D

CENTRAL EOF FLOOR PLAN

1704 5th Flr
11-10-84



16
1/10/91





Commonwealth Edison
1400 Cplus Place
Downers Grove, Illinois 60515

March 31, 1993

Mr. A. Bert Davis
Regional Administrator
U.S. Nuclear Regulatory Commission
NRC Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Dresden Station Units 2 and 3
Quad Cities Station Units 1 and 2
Zion Station Units 1 and 2
LaSalle County Station Units 1 and 2
Byron Station Units 1 and 2
Braidwood Station Units 1 and 2
"Submittal of Change Request Number 93-01 to the Commonwealth
Edison Generic Generating Stations Emergency Plan (GSEP)
for NRC Review and Approval"
NRC Docket Nos. 50-237/249; 50-254/265;
50-295/304; 50-454/455; 50-456/457

- References: 1) NUREG/CR-073 - "Clarification of TMI Action Plan Requirements,"
Supplement 1, dated January 1985
- 2) Letter to Mr. A. Bert Davis (NRC) from D. Saccomando (CECo),
dated September 29, 1992, "Submittal of Change Request 92-01 to
Commonwealth Edison Generic Generating Station Emergency Plan
for NRC Revision and Approval

Dear Mr. Davis:

Attached please find Change Request Number 93-01 to the Commonwealth Edison Generic Generating Stations Emergency Plan (GSEP) Manual. This change consists of those revisions associated with the use of our Corporate Emergency Operations Facility (CEOF), in Downers Grove, as an interim Emergency Operations Facility (EOF) which will fulfill the functions delineated in Reference 1 for an EOF until a nearsite EOF is activated. By proposing the use of the CEOF as an Interim EOF, Commonwealth Edison believes it will be capable of attaining the 1 hour "goal" identified in Reference 1. This proposed change also encompasses our previously proposed change to designate the CEOF as the backup EOF for Zion Station, which was submitted via Reference 2.

The enclosure contains:

- 1) A detailed Change Summary;
- 2) A section highlighting additions as "Redline" and deletions as "strike outs";
- 3) A section containing the text as it will be incorporated into the GSEP.

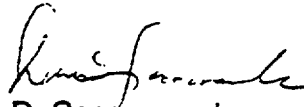
These changes have been reviewed in accordance with Commonwealth Edison practices by the Onsite and Off-site Safety Review groups. These changes are not in conflict with applicable FSARs or Technical Specifications. Pursuant to 10 CFR 50.54(q), these changes do not decrease the effectiveness of the overall GSEP.

Attachment A details CECO's philosophy supporting the proposed changes.

As stated in Reference 2, the proposed use of the CEOF as the backup EOF for Zion Station will not be implemented until receipt of NRC approval. The changes as written in the enclosure will also not be formally incorporated into the GSEP until receipt of NRC approval.

Please direct any questions you may have regarding this matter to Ms. Irene Johnson, Emergency Preparedness and State Programs (EPSP) Director at (708) 663-2096 or Ms. Leslie E. Holden, EPSP Supervisor at (708) 663-6673.

Very truly yours,



D. Saccomando
Nuclear Licensing

Attachment

Enclosure

cc: R. Emch - NRR
R. Pedersen - NRR
C. Pederson - NRC Region III
J. McCormick-Barger - NRC Region III
NRC Resident Inspector - Dresden, w/o enclosure
NRC Resident Inspector - Braidwood, w/o enclosure
NRC Resident Inspector - Byron, w/o enclosure
NRC Resident Inspector - Zion, w/o enclosure
NRC Resident Inspector - Quad Cities, w/o enclosure
NRC Resident Inspector - LaSalle, w/o enclosure
NRC Document Control Desk

APR 2 1993

ATTACHMENT A

During an inspection last year, NRC Region III inspectors identified a concern regarding CECO's ability to staff off-site emergency response facilities (i.e. Emergency Operations Facilities, or EOFs), within the one hour goal specified in Reference 1. Edison has examined its options to address the one hour facility staffing goal with the intent of relieving the Technical Support Center (TSC) of off-site interface responsibilities. Our approach involves staffing a corporate EOF within the one hour goal while a nearsite EOF is being staffed. This concept has been discussed in several meetings between Commonwealth Edison, NRC Region III & NRR Staff.

The interim EOF approach is consistent with Edison's past use of the Corporate Command Center (CCC). The Corporate Command Center was an integral element of the Generating Station Emergency Plan (GSEP), was utilized in the past during normal work hours. The threshold for activation of the CEOF as an interim EOF has been lowered from site area emergency to those ALERTs which present radiological release or reactor safety consequences. As a result of this review, a new CEOF organization was designed which is capable of assuming those duties identified in the NUREG as being fulfilled by an emergency off-site facility. This change is also reflected in the nearsite EOF minimum staffing.

This change also addresses the use of the CEOF as a backup EOF if the nearsite EOF should become unavailable. When functioning as a backup EOF, full EOF staffing will be assigned and standard EOF procedures will be used. The CEOF has been designed to accommodate a staff of this size.

The CEOF can be expected to be staffed off hours within the one hour goal (55 to 75 minutes) after a callout initiation. This activation time is consistent with TSC staffing times. Once staffed, the CEOF may assume "Command and Control" from the TSC at the discretion of the Station Director and the Manager of Emergency Operations (CEOF).

CECO continues to make best faith efforts to reduce the staffing times to its nearsite EOF's. Work to date has included the use of dedicated augmentation callers which decrease the amount of time needed to contact emergency responders. Individuals are being prioritized based on quickest off hours response times, to a given EOF. The response time information has been modelled to determine the effectiveness of these changes. Edison will provide the results of the resultant sensitivity analysis derived from the model under separate cover. Subsequent augmentation drills will be conducted to validate the effectiveness of these changes.

The proposed changes do not decrease the effectiveness of the GSEP and do not result in a reduction to public health or safety. CECO has implemented the use of the CEOF as an interim EOF in our efforts to provide the most timely response to a GSEP classified event. The use of the CEOF as an interim EOF allows for the deployment of maximum station resources to the emergency situation.

4/27/92 1307

GSEP-93-01
Change Summary

This revision to the GSEP redefines the use and modifies the staffing philosophy of the Corporate Emergency Operations Facility (CEOF), revises Staffing of the CEOF and EOF, and introduces the Significant Alert designation to activate the CEOF.
Page references in this change summary represent Revision 7A page numbering.

<u>Section</u>	<u>Page</u>	<u>Description</u>
0.0	0-5	2.28 <u>PRECAUTIONARY ACTIVATION</u> deleted since it is unnecessary with modified CEOF staffing philosophy. <u>SIGNIFICANT ALERT</u> added to list of Section 2 Definitions and designated 2.37. Defined terms renumbered between 2.28 and 2.37. (Source GSEP-93-01)
0.0	0-7	Added CEOF to title of Technical Communicator (CEOF/EOF). (Source GSEP-93-01)
0.0	0-8	4.3-3, * deleted "Corporate" from titles to eliminate the inference that these positions may only be filled with corporate personnel. 4.3-5 changed to Technical Specialist (CEOF) 4.3-6 changed to Protective Measures Director (CEOF) 4.3-7 changed to Health Physics/Environmental Specialist (CEOF) 4.3-8 changed to Advisory support Manager (CEOF) 4.3-9 changed to Emergency Planner (CEOF) 4.3-10 changed to Intentionally Blank The above changes are made to reflect the CEOF staffing titles discussed in Section 4 and carried throughout the GSEP. 4.3-10 is left blank to retain the numbering of the subsequent EOF and ENC organization numbers. (Source GSEP-93-01)
0.0	0-9	4.3-39 deleted "Corporate" from title to eliminate the inference that this position may only be filled by Corporate personnel. (Source GSEP-93-01)
2.0	2-6	2.28 <u>PRECAUTIONARY ACTIVATION</u> deleted since it is unnecessary with modified CEOF staffing philosophy. 2.29 through 2.32 renumbered. Previous 2.34 moved to this page and renumbered 2.33. (Source GSEP-93-01)
2.0	2-7	2.34 through 2.37 renumbered. <u>SIGNIFICANT ALERT</u> added as 2.37. (Source GSEP-93-01)
3.1.2	3-4	Section revised to reflect the activation of the CEOF as an interim facility with the capability to assume command and control until such time as the EOF is staffed and prepared to take overall responsibility for the event. The decision process and criteria for determining when and if the CEOF assumes command and control is specified in the CEPIPs. (Source GSEP-93-01) The reference to the Command Center in the Edison Building has been removed and a reference to the CEOF has been inserted in its place, with respect to what facility serves as a Backup EOF for Zion Station. (Source GSEP-92-01)

- 3.4.4 3-7 Section revised to CEOF function before and after the EOF is activated. (Source GSEP-93-01)
The reference to the Command Center in the Edison Building has been removed and a reference to the CEOF has been inserted in its place, with respect to what facility serves as a Backup EOF for Zion Station. (Source GSEP-92-01)
- 3.4.5 3-7 Paragraph concerning the use of an EOF as a Backup EOF for an inoperative facility has been changed to mandate the use of the CEOF as a Backup EOF for Zion Station rather than the Command Center located in the Edison Building. (Source GSEP-92-01)
- 4.2 4-7 Added CEOF to title of Technical Communicator (To CEOF/EOF). (Source GSEP-93-01)
- 4.2 4-10 Deleted references to Corporate MEO in the first four bullets indicating that information is to be passed to the MEO whether the position is at the CEOF or EOF. (Source GSEP-93-01)
- 4.2 4-18 Added CEOF to title. Last two bullets revised to reflect the Technical Specialist (CEOF) and the CEOF as communications links. (Source GSEP-93-01)
- 4.2 4-25 Rephrased the sixth bullet to indicate it is not expected that the CEOF will take control of the Environmental Field Teams. (Source GSEP-93-01)
- 4.2 4-29 Changed MEO title in the sixth bullet item. Corrected title of Access Control Coordinator. (Source GSEP-93-01)
- 4.3 4-30 Third paragraph revised to reflect the differences in activation and staffing of the EOF and CEOF. Corporate Manpower/Logistics Director deleted from second note to reflect deletion of this position. NDO added as a point of contact. (Source GSEP-93-01)
- 4.3.1 4-31 Section revised to reflect the CEOF activation, command and control and organization. Item 7 deleted as not applicable, item 8 included in item 4 and therefore deleted. Organization titles and table numbers changed to reflect new positions. List of specific functions NOT taken by the CEOF added.
- 4.3 4-32 CEOF Organization chart revised to reflect new organization and titles. (Source GSEP-93-01)
- 4.3 4-34 Deleted 1)e. No longer applicable. Added actions for a Significant Alert and the responsibility to interface with the ERP from the deleted Corporate Manpower/Logistics Director (CEOF) position. (Source GSEP-93-01)
- 4.3 4-35 Revised 3)a. and NOTE to indicate activation of the CEOF is no longer discretionary. Deleted reference to deleted NOD. Added the NDO's CEPIP to the last paragraph as reference to the NDO's duties and responsibilities. (Source GSEP-93-01)

- 4.3 4-36 Deleted "Corporate" from title and revised responsibilities to reflect the revised CEOF organization. Deleted bullet item to minimize damage to the plant because the focus of the CEOF is external to plant actions. (Source GSEP-93-01)
- 4.3 4-37 Deleted "Corporate" from title and revised responsibilities to reflect the revised CEOF organization.
- 4.3 4-38 Moved PMD to Table 4.3-6. Added Technical Specialist (CEO) description of responsibilities. (Source GSEP-93-01)
- 4.3 4-39 Deleted the position of Corporate Health Physics Director. Position responsibilities reassigned to the Protective Measures Director (CEO). Deleted "Corporate" from title and revised PMD responsibilities to reflect the revised CEOF organization. (Source GSEP-93-01)
- 4.3 4-40 Moved ASM to Table 4.3-8. Labeled page INTENTIONALLY BLANK. (Source GSEP-93-01)
- 4.3 4-41 Deleted Corporate Governmental Support Director (CEO) position. Position responsibilities reassigned to the Advisory Support Manager (CEO). Added Health Physics/Environmental Specialist (CEO) position and description of responsibilities. (Source GSEP-93-01)
- 4.3 4-42 Deleted Corporate Manpower/Logistics Director (CEO) position. Position responsibilities reassigned to the Nuclear Duty Officer and Emergency Planner (CEO). Deleted "Corporate" from title and revised ASM responsibilities to reflect the revised CEOF organization. (Source GSEP-93-01)
- 4.3 4-43 Continued deletion of the Corporate Manpower/Logistics Director (CEO) position. Added Emergency Planner (CEO) position and description of responsibilities. (Source GSEP-93-01)
- 4.3 4-44 Deleted the position of Corporate Communications Director (CEO). Page designated "Intentionally Blank" to preserve the Table numbering for the EOF and ENC organizations. (Source GSEP-93-01)
- 4.3 4-45 Deleted reference to the Corporate Manpower/Logistics Director. Position was eliminated. Added the NDO as a coordination contact. (Source GSEP-93-01)
- 4.3 4-46 Deleted statement indicating that CEOF staff may relocate to the EOF. The CEOF staff will now remain at the CEOF.
- 4.3 4-51 Deleted "Corporate" from TSM title and added (CEO) for clarity. (Source GSEP-93-01)
- 4.3 4-62 Fifth bullet: Deleted "Corporate" from PMD title and added (CEO) for clarity. Clarified wording. (Source GSEP-93-01)
- 4.3 4-63 First Bullet: Deleted Corporate HPD, position was deleted. (Source GSEP-93-01)

- 4.3 4-65 Fifth Bullet: Clarified wording to be consistent with GSEP usage of PARs. (Source GSEP-93-01)
- 4.3 4-71 Fourth Bullet: Deleted "Corporate" from ASM title and added (CEOF) for clarity. (Source GSEP-93-01)
- 4.3 4-77 Deleted "Corporate" from the title and added (CEOF) for clarity. Change was made to eliminate the inference that the position is filled by Corporate personnel. (Source GSEP-93-01)
- 4.3 4-80 First Bullet: Deleted second sentence which referenced a position that is deleted. (Source GSEP-93-01)
- 4.4.2 4-101 Revised wording to be consistent with GSEP usage of EALs and PARs. (Source GSEP-93-01)
- 4.4.5 4-109 CEOF Staffing Revised to reflect revised titles and new positions. NOTE added above the EOF Minimum Staffing to describe minimum staffing position filling philosophy. Revised EOF Minimum Staffing positions to reflect enhancement of responsibility distribution. (Source GSEP-93-01)
- 4.4.6 4-109 Deleted responsibility to contact the DOE. Moved responsibility for issuing KI to 4). (Source GSEP-93-01)
- 4.7.4 4-116 Revised last paragraph to reflect notification of the DOE is the responsibility of the affected State(s). (Source GSEP-93-01)
- 6.1.1 6-3 Revised NOTE to indicate that the TSC will maintain NRC notification responsibilities until the EOF is in Command and Control. (Source GSEP-93-01)
- 6.1.3 6-15 Table 6.1-1, 1)c. Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
- 6.1.3 6-17 Table 6.1-2, 1)c. Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
- 6.1.3 6-18 Table 6.1-2, Corrected clerical errors and added NOTE to indicate activating the CEOF when an Alert is declared on a Significant Alert EAL. Deleted 3)b. and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
- 6.1.3 6-19 Table 6.1-3, 1)c. Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)
- 6.1.3 6-20 Table 6.1-3, Corrected clerical error and revised to indicate that CEOF activation is not optional. Deleted 3)b and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
- 6.1.3 6-21 Table 6.1-4, 1)c. Seventh bullet deleted responsibility to request assistance from the DOE. This is an affected State responsibility. (Source GSEP-93-01)

- 6.1.3 6-22 Table 6.1-4, Corrected clerical error and revised to indicate that CEOF activation is not optional. Deleted 3)b and 3)e., this is done with activation callout. Reordered actions for intended sequence. Corrected title in 4) to clarify intent. (Source GSEP-93-01)
- 6.1.3 6-23 Revised MEO title to include CEOF or EOF. (Source GSEP-93-01)
- 7.1.4 7-4 Revised to reflect enhanced use of the CEOF as an interim facility and to clarify that the CEOF is no longer discretionary. (Source GSEP-93-01)
Section on the Corporate EOF has been changed to designate the CEOF as the official Backup EOF for Zion Station. The sentence designating the Command Center in the Edison Building as the official Backup EOF has been deleted. (Source GSEP-92-01)
- 7.1.5 7-5 Statement concerning Zion EOF habitability has been expanded to reiterate the existence of a Backup EOF in Downers Grove, should the nearsite EOF become uninhabitable. (Source GSEP-92-01)
- 7.2.2 7-7 The "NOTE" preceding the description of EOF communications capabilities has been deleted. When this section was written, the CEOF did not have access to the Commonwealth Edison microwave system. The facility now has full access to the system, providing redundancy in communications (both voice and data) as well as Party Lines (PLs) and a functional GSEP Radio Console to direct the activities of environmental monitoring teams. When operating as a Backup EOF for Zion Station, the CEOF microwave lines may be transferred from the nearsite EOF in two stages, thus facilitating a smooth transition between the facilities. (Source GSEP-92-01)

The Following Section

Depicts the Additions in

Redline and the Deletions

in Strikeout

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7A	MAY 1992	JULY 15 1992
7B	[UPON GSEP-92-01 AND GSEP-93-01 APPROVAL]	

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2-28 PRECAUTIONARY ACTIVATION

~~Precautionary Activation of an Emergency Response Facility (ERF) is when key Managers or Directors are called, without formal initiation of facility staffing per procedure, to report to an ERF for support purposes. The presence of Minimum Staffing, as described in Section 4, is neither intended or implied. A facility at Precautionary Activation may not assume Command and Control, nor is it intended that there be an upgrade in emergency classification as a result of any ERF being placed in Precautionary Activation.~~

~~2-29~~2-28 PROBABLE

Supported by evidence strong enough to establish presumption but not proof; an event that is likely to occur; the probability that an event will occur is greater than or equal to 50%.

~~2-30~~2-29 PROJECTED DOSE

That calculated dose commitment that some individuals in the population group may receive if no protective actions are implemented. Projected doses are calculated to establish an upper limit boundary.

~~2-31~~2-30 PROTECTED AREA

That onsite area within the security boundary as defined in each station's Security Plan.

~~2-32~~2-31 PROTECTIVE ACTION GUIDES (PAG)

Projected radiological dose or dose commitment values to individuals in the general population that warrant protective action.

Protective Action Guides are criteria used to determine if the general population needs protective action regarding projected radiological doses, or from actual committed (measured) dose values.

~~2-33~~2-32 PROTECTIVE ACTION RECOMMENDATIONS (PARs)

Recommended actions to the States for the protection of the offsite public from whole body external gamma radiation, and inhalation and ingestion of radioactive materials. Typical PARs include recommendations for sheltering, evacuation, access control and other recommendations concerning the safeguards of affected food chain processes.

2-34

2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

2-35

2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

2-36

2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

2-37

2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 SIGNIFICANT ALERT

Those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5.

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

- * The CEOF Organization
- * The EOF Organization
- * The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEO) and/or Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal, State, and local authorities.

~~During the less serious emergencies, (i.e., Unusual Events or Alerts), the CEOF Organization may take responsibility for evaluating, coordinating, and directing the overall company activities involved in coping with the emergency. The CEOF Organization functions under a Corporate Manager of Emergency Operations and its responsibilities include command and control, intelligence, logistics, engineering support, medical care, manpower requirements, communications, accounting, legal, health physics, environmental, and news information. Activation of the CEOF will normally take place only during regular working hours (8:00 a.m. to 4:30 p.m., Monday thru Friday). The CEOF is located in the Downers Grove facility.~~

~~The CEOF will be activated at a Significant Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).~~

~~The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.~~

~~The command center located in the Edison Building serves as the backup EOF for Zion Station as described in Section 3.4.~~

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the Corporate Manager of Emergency Operations. ~~The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control. Once the EOF Organization is activated, the CEOF Organization, if activated, becomes support staff to the EOF. (See Section 4.0).~~

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the Corporate Manager of Emergency Operations (CEOF) may will direct a staff in evaluating, and coordinating, and directing the overall company activities involved with an emergency. ~~If the EOF Organization is activated at the EOF, then the CEOF Organization, if activated, shall report to the EOF Organization in a supporting role.~~ Activation of the CEOF is always optional mandatory upon declaration of a Significant Alert, Site Emergency or General Emergency. ~~When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role.~~ The CEOF is located in the Downers Grove facility.

~~The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. The command center located in the Edison Building has been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required.~~ Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, Corporate Manager of Emergency Operations (CEOF) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove. ~~which shall use the command center located in the Edison Building.~~

Recommended organization and staffing for the OSC during extended emergency events (i.e., events lasting longer than twenty-four hours) are shown in figures included with this section.

NOTE

 * The OSC shall remain activated during events classified as Site *
 * Emergency and General Emergency. The OSC may be de-activated at *
 * the Alert level if deemed unnecessary by the Acting Station *
 * Director/Station Director. *

All Station Emergency Response Organization personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan. The major responsibilities and duties of these personnel are given in the following tables:

- Table 4.2-1 - Acting Station Director/Station Director
- Table 4.2-2 - Assistant Station Director
- Table 4.2-3 - State/NARS Communicator
- Table 4.2-4 - Operations Director
- Table 4.2-5 - Control Room Communicator (in the TSC)
- Table 4.2-6 - Operational Support Center Director
- Table 4.2-7 - Operational Support Center Supervisor
- Table 4.2-8 - Technical Director
- Table 4.2-9 - Technical Communicator (to CSOP/EOF)
- Table 4.2-10 - ENS Communicator
- Table 4.2-11 - TSC Technical Status Board Recorders
- Table 4.2-12 - Administrative Director
- Table 4.2-13 - Radiation Protection Director
- Table 4.2-14 - Chemistry Director
- Table 4.2-15 - HPN Communicator
- Table 4.2-16 - TSC Environs Director
- Table 4.2-17 - TSC ODCS Specialist
- Table 4.2-18 - Maintenance Director
- Table 4.2-19 - Stores Director
- Table 4.2-20 - Security Director

TABLE 4.2-1 (cont'd)

ACTING STATION DIRECTOR STATION DIRECTORPART B) STATION DIRECTOR (TSC) RESPONSIBILITIES WITH THE CORPORATE EOF OR EMERGENCY OPERATIONS FACILITY IN COMMAND AND CONTROL INCLUDE:

- o Keep the Manager of Emergency Operations (CEOF or EOF) /~~Corporate MEO~~ and NRC informed as to the status of the plant.
- o Assist the MEO (CEOF or EOF) /~~CMEO~~ in the acquisition of information for the NARS, NRC Event Notification Worksheet and State Agency Updates Checklist.
- o Provide information and recommendations to the MEO (CEOF or EOF) /~~Corporate MEO~~.
- o Implement plans, procedures and schedules to meet emergency response objectives as directed by the MEO (CEOF or EOF) /~~Corporate MEO~~.
- o Request from the Corporate Emergency Response Organization any additional material, manpower and equipment needed to implement response plans and operations.
- o Continue to supervise the Station Emergency Response Organization (i.e. Control Room, OSC and TSC).
- o Provide a station Senior Reactor Operator (SRO) for the EOF as requested by the MEO or Nuclear Duty Officer.
- o Maintain a record of GSEP related activities.

TABLE 4.2-9

TECHNICAL COMMUNICATOR (TO CEOF/EOF)

The TSC Communicators are responsible for transmitting/receiving information to and from the TSC.

General responsibilities assigned to all TSC Communicators include:

- o Establish communications with appropriate parties as directed by the responsible Director.
- o Transmit information that has been reviewed and/or approved by the responsible Director.
- o Document time, date and information being transmitted or received on appropriate forms.
- o Record and relay inquiries to responsible Directors and the responses to those inquiries.
- o Assist appropriate Directors in maintaining proper records and logs of GSEP related activities.

SPECIFIC DUTIES ASSIGNED TO THE
TECHNICAL COMMUNICATOR (TO CEOF/EOF) INCLUDE:

- o Report to TSC Technical Director.
- o Establish and maintain contact with the ~~EOF via Technical Support Party Line (PL-3) Phone or Station Extension. (Normally talks with the Technical Specialist (CEO) and/or the Technical Communicator at the EOF).~~
- o Provide CEOF/EOF with Plant Status Information as directed by the TSC Technical Director.

TABLE 4.2-16

TSC ENVIRONS DIRECTOR (TSC)

The TSC Environs Director reports to the Radiation Protection Director and supervises the activities of CECO Environmental Sampling Teams in an emergency. Once the EOF Environs Director has taken control of the Environmental Sampling Teams, the TSC Environs Director will continue to monitor offsite environmental data and will assist the Radiation Protection Director as deemed appropriate.

Responsibilities assigned to the TSC Environs Director include:

- o Supervise the activities of the ODCS Specialist.
- o Assemble one or more environmental monitoring teams, and track these individuals accumulated dose.
- o Dispatch and coordinate the activities of CECO Environmental Monitoring Teams. This includes:
 - Dose rate surveys (including plume tracking);
 - Air sampling;
 - Soil, water, and vegetation sampling;
 - Contamination surveys; and
 - Exchange of TLDs and filter cartridges from fixed environmental stations.
- o Accumulate, tabulate, and evaluate environmental and radiological data.
- o Request additional environmental personnel and/or equipment, as necessary. This includes:
 - Assistance for road blocks and security until State, County and Local personnel are available;
 - Obtain communications equipment as necessary. Telephones, mobile radios, and portable radios may be required;
 - Obtain required transportation for personnel; and
 - Obtain sufficient technical and nontechnical personnel to expand the operation as necessary.
- o Transfer command of the Environs Field Teams to the EOF/CEOF Environs Director when appropriate. The Protective Measures Director (CEOF) may take command of the Environmental Field Teams if agreed upon by the MEO (CEOF) and the Station Director or the MEO (EOF).
- o Make appropriate Protective Action Recommendations for the public to the Radiation Protection Director.
- o Maintain a record of GSEP related activities.

TABLE 4.2-20

SECURITY DIRECTOR (TSC)

The Security Director maintains plant security and personnel accountability at the nuclear station. The Security Director shall report directly to the Station Director.

Responsibilities assigned to the Security Director include:

- o Maintain plant security and account for all personnel within the protected area as necessary or required.
- o Identify, for the Station Director, any nonroutine security procedures and/or contingencies that are in effect or that require a response.
- o Expedite ingress and egress of key emergency response personnel, as required.
- o Coordinate with the Radiation Protection Director in controlling ingress and egress to and from the protected area if radiological concerns are present.
- o Provide for access control to the Control Room, TSC and OSC, as appropriate.
- o Initiate security at the EOF and JPIC if it is requested by the Corporate MEO (CEOF) or the Station Director. It shall be the responsibility of the Security Director to contact an Access Control Coordinator and to notify the Corporate Nuclear Security Administrator. Access Control ~~Directors~~ Coordinators are listed in the GSEP telephone directory.
- o Provide an escort and expedite ingress, as necessary, for NRC Site Team personnel in conjunction with the Radiation Protection Director.
- o Act as the TSC liaison with the appropriate NRC Site Team representative.
- o Assist the Radiation Protection Director in determining personnel evacuation routes as necessary.
- o Assist the Station Director in evaluating changes in security related Emergency Action Levels (EALs).
- o Maintain a record of GSEP related activities.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

SECTION 4.3.1 CEOF Organization

SECTION 4.3.2 EOF Organization

SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECO's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Significant Alerts, Site and General Emergencies. CEOF activation for other Alerts or Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEGF) deems appropriate.

NOTE:

 * The roles of the System Power Supply Office and the Nuclear Duty *
 * Officer are unique in that they may be considered as parts of the *
 * overall Corporate Emergency Response, but do not hold specifically *
 * identified positions within the CEOF Organization, the EOF *
 * Organization, or the ENC Organization. For a description of *
 * their general responsibilities as they pertain to the GSEP, refer *
 * to the following referenced Tables: *
 * *
 * Table 4.3-1 System Power Supply Office *
 * Table 4.3-2 Nuclear Duty Officer *

NOTE:

 * The Emergency Restoration of Power (ERP) Director is a position *
 * that coordinates with the Corporate Emergency Response *
 * Organization. The ERP Director works with the Nuclear Duty *
 * Officer when the CEOF is activated and the Manpower/Logistics *
 * Director (EOF) when the EOF is activated, or Corporate *
 * Manpower/Logistics Director as determined by the facility in *
 * Command and Control. This organizational relationship is *
 * depicted on the Organization charts by a dotted line. For a *
 * description of the general responsibilities of the ERP Director *
 * as they pertain to the GSEP, refer to the following referenced *
 * Table: *
 * *
 * Table 4.3-11 ERP Director *

4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control the same emergency response actions and functions as the EOF Organization, there are several factors differentiating these two the CEOF and EOF Organizations:

- 1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.
- 2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.
- 3) The CEOF would likely be the CECO facility utilized during daytime hours for Corporate Response to Transportation Accidents. (This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).
- 4) The CEOF Organization would normally shall be activated during daytime work hours, Monday through Friday when a Significant Alert, a Site Emergency or a General Emergency is declared.
- 5) The CEOF may assume if nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies if until the EOF has not yet been activated is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEO) and Station Director.
- 6) If When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, which will assume after Command and Control of the response is transferred to the EOF.
- 7) ~~The CEOF Organization's staffing requirements are more flexible regarding its function of either taking Command and Control or acting in a support role only.~~
The CEOF should not assume ENS/BPE communications responsibilities
- 8) ~~The criteria for activation and use of the CEOF Organization is always discretionary, while activation of the EOF Organization is required for certain events.~~

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3	CORPORATE MANAGER OF EMERGENCY OPERATIONS (CEO)
Table 4.3-4	CORPORATE TECHNICAL SUPPORT MANAGER (CEO)
Table 4.3-5	CORPORATE PROTECTIVE MEASURES DIRECTOR (CEO)
Table 4.3-5	TECHNICAL SPECIALIST (CEO)
Table 4.3-6	CORPORATE HEALTH PHYSICS DIRECTOR (CEO)
Table 4.3-6	PROTECTIVE MEASURES DIRECTOR (CEO)
Table 4.3-7	CORPORATE ADVISORY SUPPORT MANAGER (CEO)
Table 4.3-7	HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEO)
Table 4.3-8	CORPORATE GOVERNMENTAL SUPPORT DIRECTOR (CEO)
Table 4.3-8	ADVISORY SUPPORT MANAGER (CEO)
Table 4.3-9	CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEO)
Table 4.3-9	EMERGENCY PLANNER (CEO)
Table 4.3-10	CORPORATE COMMUNICATIONS DIRECTOR (CEO)
Table 4.3-10	INTENTIONALLY BLANK

FIGURE 4.3-1
THE CEOF ORGANIZATION

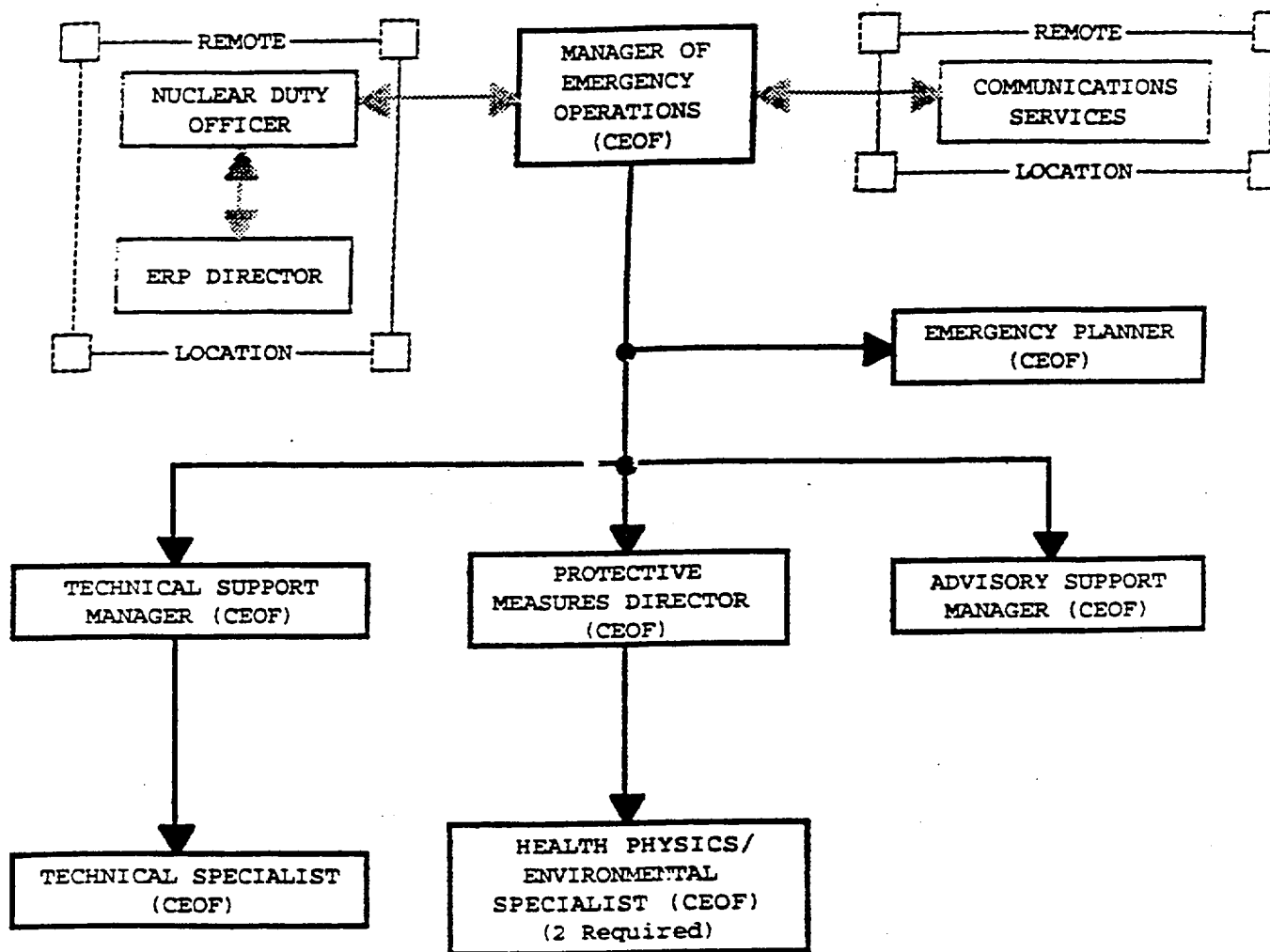


TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECO individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

- a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.
- b. Verify that all appropriate notifications have been made.
- c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.
- d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.
- ~~e. If the event has the potential for escalation to a Site or General Emergency, or at the NDO's discretion the NDO shall:

 - * ~~Consider establishing Access Control at the affected Station's EOF and JPIC.~~
 - * ~~Notify the Corporate Emergency Preparedness Department to prepare the EOF for activation.~~
 - * ~~Initiate call to place the EOF Organization on standby status, per the GSEP telephone directory call tree. (This may involve notification of the EOF minimum staff personnel.)~~~~
- f. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.
- g. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

- a. Complete all actions as listed above in part 1).
- b. Notify ANI and INPO within eight (8) hours of event classification.
- ~~c. If the Alert Classification is determined to be a Significant Alert, activate the CROF Organization.~~
- ~~d. When the CROF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.~~

3) ACTIONS FOR SITE AND GENERAL EMERGENCIES

- a. Activate the Corporate Emergency Response Organization (CEO and/or EOP and ENC Organizations). ~~This is a procedural requirement.~~ The NDO's responsibilities shall include all the ~~other required and discretionary~~ actions identified in 1) and 2) above.
- b. Notify the Communications Services Duty Officer (CSDO) and prior to the activation of the Emergency News Center Organization, review any news releases for accuracy.

4) ACTIONS FOR A TRANSPORTATION ACCIDENT

- a. Complete actions a, b and f as listed above in part 1).
- b. Notify ANI and INPO within eight (8) hours of the accident.
- c. Maintain a record of activities.

NOTE:

 * The NDO's function is to determine the degree of Corporate *
 * assistance required to control and mitigate emergency events. *
 * Additionally, it is the NDO's responsibility to initiate *
 * Corporate assistance, by activating those parts of the *
 * Corporate Emergency Response Organization, (CEO and/or EOP *
 * and ENC Organizations), which the NDO deems appropriate or *
 * are required by Company procedures. *

For more specific duties and responsibilities of the NDO in regards to response to generating station and utility emergencies, refer to the current Nuclear Operations Directive (NOD) addressing the NDO's actions NDO'S Corporate Emergency Plan Implementing Procedure (CEPIP).

TABLE 4.3-3

CORPORATE MANAGER OF EMERGENCY OPERATIONS (CEOF)

The Corporate MEO (EMEO CEOF), when in Command and Control, will direct CECOs Emergency Response activities until such time when (and if) the EOF Organization assumes Command and Control. After when the EOF Organization assumes Command and Control, the EMEO (CEOF) and Staff become will remain in place as a support group to for the Manager of Emergency Operations (EOP).

When the TSC has Command and Control, assume the ongoing Responsibilities assigned to the EMEO (CEOF), including (if in Command and Control of the Emergency Response):

- o Direct the CEOF Organization shown in Figure 4.3-1 and coordinate all CECO activities involved in coping with the emergency, ~~determine staffing needs as appropriate.~~
- o ~~Approve the technical content of CECO press releases prior to their being released to the media. Coordinate CECO press releases with the Nuclear Duty Officer and Communications Services, as appropriate.~~
- o Request assistance from non-CECO emergency response organizations, as required.
- o ~~Evaluate the need, based on events in progress, to staff the EOF to provide additional support to the Station.~~
- o Maintain a record of the GSEP related activities.

When the CEOF assumes Command and Control, assume the additional responsibilities assigned to the MEO (CEOF) including:

- o All nondelegable responsibilities of Command and Control as delineated in Section 4.4.6 of this plan.
- o ~~Ensure State Agency Update Forms Checklists are approved prior to transmittal completed and transmitted on an hourly basis.~~
- o Approve the contents of the NARS form prior to transmittal.
- o Notify appropriate Federal, State, and local agencies of emergency conditions in accordance with Section 6.0 of this plan.
- o Ensure that appropriate measures are taken Onsite to:
 - Terminate the condition causing the emergency.
 - Protect employees and the public.
 - ~~Minimize damage to the plant.~~
 - Effect post accident recovery and deactivate the Emergency Response Organization when appropriate.
- ~~o Maintain a record of GSEP related activities.~~

After the EOF Organization has ~~assumed~~ assumed Command and Control:

- o Remain at the CEOF and provide assistance to the ~~Station Director and~~ Station Director and Manager of Emergency Operations (EOP), as requested.
- ~~o Direct the CEOF Organization shown in Figure 4.3-1.~~
- ~~o Maintain a record of GSEP related activities.~~

TABLE 4.3-4

CORPORATE TECHNICAL SUPPORT MANAGER (CEOF)

The Corporate Technical Support Manager (TSM CEOF) reports to the CMEO (CEOF) at the CEOF. The Corporate TSM (CEOF) will direct the activities of the Technical Specialist (CEOF) and will coordinate the engineering services necessary for plant modifications, special equipment arrangement, shielding, containers, or other devices needed during the emergency. When the EOF Organization assumes Command and Control, the Corporate TSM (CEOF) will functionally report to the Technical Support Manager at the EOF (EOF).

Responsibilities assigned to the Corporate TSM Technical Support Manager (CEOF) (prior to the EOF Organization assuming Command and Control) include:

- o Provide recommendations for changes in Emergency Action Level classification to the CMEO (CEOF) and participate in the decision making process.
- o Provide the CMEO with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- o Assist the CMEO in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- o Assist in the development of post-accident recovery measures.
- ~~o Provide technical information on the facility design.~~
- ~~o Ensure that modifications needed for plant recovery are implemented in a timely manner.~~
- ~~o Enlist the aid of consultants as necessary.~~
- o Determine the Corporate TSM's personal staffing needs as dictated by the level of Corporate response required by the event.
- o Advise the CMEO (CEOF) of the need to staff the EOF based on degrading plant conditions.
- o Maintain a record of GSEP related activities.

~~When the EOF Organization has assumed Command and Control, the Corporate TSM shall perform activities similar to those listed above, except that they shall be done in coordination with and in support of the Technical Support Manager who is located at the EOF.~~

TABLE 4.3-5

CORPORATE PROTECTIVE MEASURES DIRECTOR (CPOD)

~~The Corporate Protective Measures Director (PMD) reports to the CMO and is responsible for coordinating all offsite sampling/monitoring activities of CECE personnel and for interfacing with State personnel regarding dose assessment programs. When the EOF Organization assumes Command and Control, the Corporate PMD shall serve as a support individual for the Protective Measures Director at the EOF.~~

~~Responsibilities assigned to the Corporate Protective Measures Director (prior to the EOF Organization assuming Command and Control) include:~~

- ~~o Direct the environmental sampling activities of the TSC Environs Director.~~
- ~~o Direct the activities of the Corporate Health Physics Director.~~
- ~~o Coordinate the environmental contractor's assistance in the collection of environmental data.~~
- ~~o Cooperate with the Illinois Department of Nuclear Safety (and contiguous State agencies) in the implementation of an offsite dose assessment counterpart program.~~
- ~~o Based on environmental sampling or known plant releases, calculate projected dose values for affected areas; based on these projections, advise the CMO of protective action recommendations for plant personnel and members of the public.~~
- ~~o Assist the CMO in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.~~
- ~~o Determine the Corporate Protective Measures Director's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~o Maintain a record of CSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, the Corporate Protective Measures Director shall obtain information and perform activities in support of the Protective Measures Director located at the EOF.~~

TABLE 4.3-5

TECHNICAL SPECIALIST (CEOP)

The Technical Specialist (CEOP) is responsible for obtaining and disseminating plant condition and status information in the CEOP. The Technical Specialist (CEOP) reports to the Technical Support Manager (CEOP).

Responsibilities assigned to the Technical Specialist (CEOP) include:

- Ensure that critical parameters are identified and trended utilizing the Safety Parameter Display System (SPDS), Point History (PTRSTY) and Point Trend programs.
- Advise the TSM (CEOP) of changes in Emergency Action Level (EAL) classification based on plant conditions or parameters.
- Establish contact with the Technical Communicator (TO CEOP/EOP).
- Obtain plant status information.
- Maintain a record of GSEP related activities.

~~The Corporate Health Physics Director (HPD) shall support the onsite Health Physics activities and report to the Corporate Protective Measures Director. The Corporate HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable.~~

~~Responsibilities assigned to the Corporate Health Physics Director (prior to the BOP Organization assuming Command and Control), include:~~

- ~~o Determine the need for additional radiological support personnel, Health Physics instrumentation, dosimetry, and protective equipment.~~
- ~~o Review plant health physics information and make recommendations to the Corporate Technical Support Manager.~~
- ~~o Assist in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.~~
- ~~o Assist in the planning and coordination of activities associated with the evacuation of non essential personnel.~~
- ~~o Keep informed of the activities of CECO and State and offsite environmental monitoring teams.~~
- ~~o Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:~~
 - ~~o Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.~~
 - ~~o Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.~~
 - ~~o Coordinate the activities of contracted radiological medical assistance personnel.~~
 - ~~o Analyze all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.~~
 - ~~o Ensure that procedures governing the use of thyroid blocking agents have been followed by CECO emergency personnel.~~
 - ~~o Consult with the Corporate MEO regarding measures to protect onsite personnel and the offsite public.~~
- ~~o Maintain a record of GSBP related activities.~~

~~When the BOP Organization has assumed Command and Control, the Corporate Health Physics Director shall perform activities in support of the Health Physics Director at the BOP.~~

~~CORPORATE HEALTH PHYSICS DIRECTOR (CBOP)~~

TABLE 4.3-6

TABLE 4.3-5 6

CORPORATE PROTECTIVE MEASURES DIRECTOR (CEOF)

The Corporate Protective Measures Director (PMD CEOF) reports to the EMEO (CEOF) and directs the activities of the Health Physics/Environmental Specialists (CEOF) and is responsible for coordinating all the PMD (CEOF) is cognizant of offsite sampling/monitoring activities of CECO personnel and for interfacing with State personnel regarding dose assessment programs, as appropriate. The PMD (CEOF) shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personal exposure as low as reasonably achievable. When the EOF Organization assumes Command and Control, the Corporate PMD shall serve as a support individual for the Protective Measures Director (EOF) at the EOF.

Responsibilities assigned to the Corporate Protective Measures Director (CEOF) (prior to the EOF Organization assuming Command and Control) include:

- o Provide recommendations for changes in radiological Emergency Action Level classification to the MEO (CEOF).
- o Direct Maintain cognizance of the environmental sampling activities of the TSC Environ Director.
- o Advise the MEO (CEOF) on the need for emergency exposure approval for CECO emergency workers.
- o Advise the MEO (CEOF) on the need for administering thyroid blocking agents for CECO emergency workers.
- o Direct the activities of the Corporate Health Physics Director.
- o Coordinate the environmental contractor's assistance in the collection of environmental data.
- o Cooperate with the Illinois Department of Nuclear Safety (and contiguous State agencies) in the implementation of an offsite dose assessment counterpart program.
- o Based on environmental sampling or known plant releases, calculate projected dose values for affected areas, based on these projections, advise the EMEO (CEOF) of Protective Action Recommendations (PARS) for plant personnel and members of the public.
- o Assist the EMEO in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- o Determine the Corporate Protective Measures Director's personal staffing needs as dictated by the level of Corporate response required by the event. Coordinate additional radiological support as requested by the TSC.
- o Advise the MEO (CEOF) of the need to staff the EOF based on degrading radiological or environmental conditions.
- o Act as an alternate for review and approval of the State Agency Update Checklist.
- o Determine the need for and contact Medical Department personnel for assistance.

- o Maintain a record of GSEP related activities.

~~When the EOF Organization has assumed Command and Control, the Corporate Protective Measures Director shall obtain information and perform activities in support of the Protective Measures Director located at the EOF.~~

TABLE 4.3-7

CORPORATE ADVISORY SUPPORT MANAGER (CEOF)

~~The Corporate Advisory Support Manager (ASM) will manage the activities of the Advisory Support Group in the CEOF. This group provides support functions in organizational logistics and governmental interface. The Corporate ASM reports to the CMEQ and will serve as CMEQ in the event that the CMEQ is not available. When the EOF Organization assumes Command and Control, the Corporate ASM will functionally serve as a support individual for the Advisory Support Manager located at the EOF.~~

~~Responsibilities assigned to the Corporate ASM (prior to the EOF Organization assuming Command and Control), include:~~

- ~~o Assist the CMEQ in the evaluation of the significance of an emergency with respect to the public.~~
- ~~o Direct the activities of the Corporate Governmental Support Director and the Corporate Manpower/Logistics Director.~~
- ~~o Maintain records of information obtained from the other directors within the CEOF Organization, including contacts with offsite agencies, contractors and other support organizations.~~
- ~~o Serve as the CMEQ in the event that the CMEQ is not available.~~
- ~~o Ensure that access control to the CEOF is arranged as necessary.~~
- ~~o Review and approve the State Agency Update Checklist and ensure that State Updates are transmitted at least hourly.~~
- ~~o Determine the Corporate ASM's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~o Maintain a record of the GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, the Corporate Advisory Support Manager shall perform functional activities at the CEOF in support of the Advisory Support Manager located at the EOF.~~

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TABLE 4.3-8

~~CORPORATE GOVERNMENTAL SUPPORT DIRECTOR (CEO)~~

~~The Corporate Governmental Support Director (GSD) is responsible for maintaining effective interfaces between State and local agencies and shall provide State agencies with periodic updates, when the CEO is in Command and Control. The Corporate GSD shall serve as a support individual under the direction of the Corporate Advisory Support Manager.~~

~~Responsibilities assigned to the Corporate Governmental Support Director (prior to the EOF Organization assuming Command and Control), include:~~

- ~~e Ensure approved periodic update information is provided to appropriate State and local agencies via the transmittal of the State Agency Update Checklist.~~
- ~~e Ensure that updates and information are provided to CECs, State and local CEC liaison personnel, as requested.~~
- ~~e Determine the Corporate GSD's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~e Maintain a record of GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, perform activities at the CEO under the functional direction of the Governmental Support Director who is located at the EOF.~~

- o The Health Physics/Environmental Specialists (CEOF) reports to the Protective Measures Director (CEOF). The Health Physics/Environmental Specialists (CEOF) shall monitor onsite and offsite radiological conditions to collect and disseminate information to the CEOF staff.
- Responsibilities assigned to the Health Physics/Environmental Specialists (CEOF) include:
 - o Identify and trend critical radiological and meteorological parameters utilizing the Point History (PHSTY) and Point Trend programs and the meteorological contractor.
 - o Evaluate pertinent dose projection data using the OPCS computer models as requested by the PMD (CEOF).
 - o Remain cognizant of forecast data and ensure that the status is updated periodically.
 - o Immediately notify the PMD (CEOF) of meteorological changes which may impact identification of downwind sectors.
 - o Interpret radiological data and provide Protective Action Recommendations (PARS) based upon calculated dose projections to the PMD (CEOF).
 - o Advise the PMD (CEOF) of changes in Emergency Action Level (EAL) classification based on effluent releases or dose projections.
 - o Monitor the GSEP Radio transmissions to remain cognizant of the Environmental Field Team activities and radiological conditions.
 - o Request additional equipment and personnel as necessary to supplement environmental monitoring efforts from unaffiliated CEEO nuclear stations and/or an environmental contractor.
 - o Convey information pertaining to CEEO Environmental Field Team activities and sample results to State authorities.
 - o Coordinate information flow between the CEOF and the affected State(s) environmental authorities.
 - o Maintain a record of GSEP related activities.

HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)

TABLE 4.3-7

TABLE 4.3-9

CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF)

~~The Corporate Manpower/Logistics Director (MLD) is responsible for directing a staff of manpower, logistics, communications, and personnel support of the station as required by the Corporate MEO. The Corporate MLD shall report to the Corporate Advisory Support Manager.~~

~~Responsibilities assigned to the Corporate MLD (prior to the EOF Organisation assuming Command and Control), include:~~

- ~~o Provide personnel, equipment, and services as required, primarily from the appropriate Division.~~
- ~~o Direct the activities of the Corporate Communications Director.~~
- ~~o Make contact with and interface with the Emergency Restoration of Power (ERP) Director concerning utilization of additional Company resources necessary to meet the needs of the Emergency Response.~~
- ~~o Direct the clerical staff and ensure the clerical requirements for the other directors at the CEOF are met.~~
- ~~o Coordinate with the TSC's Administrative Director in assuring that clerical support is obtained for the EOF and Emergency News Center Organisation. This support should be obtained from a station or facility not affected by the emergency.~~
- ~~o Obtain services as appropriate to support operation of the CEOF such as, accommodations, office support services, food services and waste disposal.~~
- ~~o Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.~~
- ~~o Initiate use of the special emergency response function number to accrue emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.~~

continued

TABLE 4.3-7 B

CORPORATE ADVISORY SUPPORT MANAGER (CEOF)

The Corporate Advisory Support Manager (ASM CEOF) will manage the activities of the Advisory Support Group in the CEOF. This group provides support functions in organizational logistics and governmental interface. The ASM (CEOF) also shall maintain effective interfaces between State and local agencies by providing State agencies with periodic updates. The Corporate ASM (CEOF) reports to the CMO (CEOF) and also serves as CMO in the event that the CMO is not available. When the EOF Organization assumes Command and Control, the Corporate ASM (CEOF) will functionally serve as a support individual for the Advisory Support Manager (EOF) located at the EOF.

Responsibilities assigned to the Corporate ASM (CEOF) (prior to the EOF Organization assuming Command and Control) include:

- o Assist the CMO (CEOF) in the evaluation of the significance of an emergency with respect to the public.
- ~~o Direct the activities of the Corporate Governmental Support Director and the Corporate Manpower/Logistics Director.~~
- o Review Prepare, and approve and transmit the State Agency Update Checklist and ensure that State Updates are transmitted at least hourly.
- o Maintain records of CEOF activities, information obtained from the other directors within the CEOF Organization, including contacts with offsite agencies, contractors and other support organizations.
- ~~o Serve as the CMO in the event that the CMO is not available.~~
- o Ensure that access control to the CEOF is arranged as necessary is limited to Emergency Responders.
- ~~o Determine the Corporate ASM's personal staffing needs as dictated by the level of corporate response required by the event.~~
- o Maintain a record of the GSEP related activities.

When the EOF Organization has assumed Command and Control, the Corporate Advisory Support Manager shall perform functional activities at the CEOF in support of the Advisory Support Manager located at the EOF.

TABLE 4.3-9

CORPORATE MANPOWER/LOGISTICS DIRECTOR (CEOF) (cont'd)

- ~~o Determine the Corporate MLD's personal staffing needs as dictated by the level of Corporate response required by the event.~~
- ~~o Coordinate with the Production Training Center to ensure appropriate training is provided for Emergency Response personnel obtained to augment the Emergency Response Organization.~~
- ~~o Maintain a record of GSEP related activities.~~

~~When the EOF Organization has assumed Command and Control, perform activities at the CEOF under the functional direction of the Manpower/Logistics Director who is located at the EOF.~~

TABLE 4.3-9

EMERGENCY PLANNER (CEOF)

The Emergency Planner (CEOF) is responsible for verifying that the CECO Generating Stations Emergency Plan (GSEP) is implemented effectively and assists the CEOF staff in facility utilization. The Emergency Planner (CEOF) reports to the MEO (CEOF).

Responsibilities assigned to the Emergency Planner (CEOF) include:

- o Assist in activation of the CEOF.
- o Act as a GSEP subject matter expert for the CEOF Organization.
- o Operate the audio-visual system and telecommunications in the EMC as directed by the MEO (CEOF).
- o Coordinate CEOF support services as necessary.
- o Coordinate maintenance for CEOF equipment as necessary.
- o Assist any CEOF personnel, as necessary, in using desired Computer Programs.
- o Establish shift staffing for the CEOF using the GSEP Telephone Directory.
- o Establish and maintain a CEOF Ingress/Egress Log and Fitness for Duty Verification documentation.
- o Verify that the CEOF Organization is maintaining appropriate documentation of their activities.
- o Maintain a record of GSEP related activities.

TABLE 4.3-10

CORPORATE COMMUNICATIONS DIRECTOR (CSEP)

The Corporate Communications Director is responsible for the procurement of required telephone and radio communications services and facilities as specified by the Corporate Manpower/Logistics Director and maintenance of these communications as required. When the EOP Organisation assumes Command and Control, the Corporate Communications Director reports to the Communications Director, located at the EOP.

Responsibilities assigned to the Corporate Communications Director include:

- e Ensure that emergency communications equipment is kept operable.
- e Obtain additional radio and telephone equipment as necessary to meet the needs of the emergency.
- e Obtain sufficient personnel to maintain communications equipment in an operable condition.
- e Maintain a record of CSEP related activities.

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TABLE 4.3-11

EMERGENCY RESTORATION OF POWER (ERP) DIRECTOR

The Emergency Restoration of Power (ERP) Director, located in the CECo Technical Center Office in Maywood, Illinois, shall coordinate the activities of Division personnel and equipment. The ERP Director shall provide for Division support to the affected station. Upon activation of the Corporate Emergency Response Organization, the ERP Director will coordinate with either the Nuclear Duty Officer or the Manpower/Logistics Director (EOP) at the EOP, or the Corporate Manpower/Logistics Director at the CEOF.

Responsibilities assigned to the ERP Director include:

- o Activate the Emergency Restoration of Power (ERP) Program as necessary to support the station activities.
- o Inform the respective Division Director of support service required to meet the needs of the emergency response.
- o Obtain additional support from other Divisions if the level of support requirements dictates.
- o Maintain a record of GSEP related activities.

4.3.2 THE EOF ORGANIZATION

During incidents classified as Site or General Emergencies, the EOF Organization will be activated. ~~In some instances, activation of the EOF Organization may require that designated Managers or Directors of the CEOF Organization relocate to the EOF and assume additional responsibilities for assigned positions.~~ The EOF Organization functions under a Manager of Emergency Operations who is responsible for the overall company activities aimed at restoring the affected station to a safe status. The CEOF Organization provides support to the EOF Organization under the arrangement detailed in Section 4.3.1. The EOF Organization, depicted in Figure 4.3-2, consists of the following personnel whose major duties are delineated in the referenced tables.

NOTE:

 * Some EOF Positions are required to be double staffed when *
 * a remote JPIC, such as Highland Park, is activated. These *
 * positions are indicated with an asterisk. One responder *
 * will report to the EOF and one will report to the remote *
 * JPIC. *

Table 4.3-12	Manager of Emergency Operations
Table 4.3-13	Assistant MEO
Table 4.3-14	Technical Support Manager
Table 4.3-15	Technical Support Director
Table 4.3-16	Senior Reactor Operator (at EOF)
Table 4.3-17	Waste Systems Director
Table 4.3-18	Design & Construction Support Director
Table 4.3-19	Technical Information Coordinator
Table 4.3-20	EOF Status Board Recorders
Table 4.3-21	Technical Communicator (to TSC)
Table 4.3-22	ENS Communicator
Table 4.3-23	SPDS/PTHSTY Specialist

TABLE 4.3-14

TECHNICAL SUPPORT MANAGER (EOF)

The Technical Support Manager (TSM) is the designated CECO individual who has requisite authority, nuclear experience and technical expertise to manage a technical staff in support of Emergency Response operations. The Technical Support Manager shall report directly to the Manager of Emergency Operations.

Responsibilities assigned to the TSM include:

- o Manage the activities of the Technical Support Group in the EOF.
- o Provide recommendations for changes in Emergency Action Level classification to the Manager of Emergency Operations and participate in the decision-making process.
- o Provide information to the Assistant MEO for completing the NARS Form.
- o Provide the Manager of Emergency Operations with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- o Coordinate the activities of the Corporate Technical Support Manager (CTSM) located at the CECF.
- o Supervise the activities of the Technical Support Director and monitor the progress in the performance of the Technical Support Director's responsibilities.
- o Assist in the development of post-accident recovery measures.
- o Provide technical information on the facility design.
- o Ensure that modifications needed for plant recovery are implemented in a timely manner.
- o Enlist the aid of consultants as necessary.
- o Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-25

PROTECTIVE MEASURES DIRECTOR (EOF)

The Protective Measures Director (PMD) is the designated CECO individual who is specifically qualified in the management of radiological consequence assessment and who is authorized to interact with supporting agencies. This individual will supervise the environmental assessment functions at the EOF. The Protective Measures Director shall report to the Manager of Emergency Operations.

Responsibilities assigned to the Protective Measures Director include:

- o Obtain input from the Protective Measures Coordinator concerning plant status that potentially may affect the public.
- o Advise the Manager of Emergency Operations and Advisory Support Manager/Director concerning protective action recommendations.
- o Advise the Manager of Emergency Operations and the Advisory Support Manager/Director concerning changes in accident classification based upon effluent releases or dose projections.
- o Provide information to the Assistant MEO for completing the NARS Form.
- o ~~When the EOF is activated direct~~ Coordinate the activities of the Corporate Protective Measures Director (CEPF) ~~located at the CECF.~~
- o Direct the activities of the Health Physics Director and the Environmental Emergency Coordinator and monitor the progress in the performance of their responsibilities.
- o Provide or delegate to the Environmental Emergency Coordinator the review of the Environmental portions of the State Agency Update Checklist.
- o Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-26

HEALTH PHYSICS DIRECTOR (EOF)

The Health Physics Director (HPD) shall support the onsite Health Physics activities under the direction of the Protective Measures Director. The HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable. Responsibilities assigned to the Health Physics Director include:

- o Direct the activities of the ~~Corporate Health Physics Director located at the CEOF and the HPN Communicator (EOF) in the EOF.~~
- o Direct the activities of any Radiation Technicians (RTs) in the EOF, as required (i.e. habitability checks, etc.)
- o Assist the affected station in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- o Determine the need for additional Health Physics instrumentation, dosimetry, protective equipment, and radiological support personnel.
- o Review plant Health Physics information and make recommendations to the Protective Measures Director.
- o Assist and interface with the EOF Technical Group and the Station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- o Keep informed of the activities of offsite environmental monitoring teams.
- o Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:
 - Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.
 - Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.
 - Coordinate the activities of contracted radiological medical assistance personnel.
 - Analyze all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.
 - Ensure that procedures governing the use of thyroid blocking agents have been followed by CECO emergency personnel.
 - Consult with the MEO regarding measures to protect onsite personnel and the offsite public.
- o Maintain a record of GSEP related activities.

TABLE 4 2-28

ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)

The Environmental Emergency Coordinator (EEC) is the designated CECo individual who is specifically qualified in the coordination of radiological consequence assessment. The Environmental Emergency Coordinator shall report to the Protective Measures Director.

Responsibilities assigned to the Environmental Emergency Coordinator include:

- o Ensure communications are established with the Corporate EOF, and/or the TSC to obtain information on the accident conditions, meteorological conditions, and estimates of radioactive material releases.
- o Direct the activities of the Protective Measures Communicator, the State Environs Coordinator(s), and the EOF ODCS Specialist.
- o Direct the activities of the EOF Environs Director and the environmental staff. Coordinate the activities of the TSC Environs Director and environmental contractors.
- o Assist the Protective Measures Communicator in completing the Environmental portion of the State Agency update checklist.
- o Interpret radiological data and ~~based upon calculated dose projections, make recommendations for protective actions offsite~~ provide Protective Action Recommendations (PARs) based upon calculated dose projections consistent with this plan and ensure Environmental Status Boards are updated as necessary.
- o Identify changes in accident classification based on effluent releases or dose projections.
- o Verify that information necessary to implement offsite emergency plans is collected and provided to the Protective Measures Director, including the environmental portion of the State Agency Update Checklist.
- o Maintain a record of GSEP related activities.

TABLE 4 3-39

CORPORATE EMERGENCY PLANNER (EOF)

The Corporate Emergency Planner (CEP EOF) is responsible for verifying that the CECO Generating Station Emergency Plan (GSEP) is implemented properly. The CEP Emergency Planner (EOF) shall serve as a support individual for the Advisory Support Director (EOF).

Responsibilities assigned to the Corporate Emergency Planner (EOF) include:

- o Monitor information flow within the EOF organization to ensure information requirements are being met.
- o Assess the effectiveness of ongoing EOF working relationships and recommend functional enhancements to the Advisory Support Director.
- o Verify that the EOF Organization is maintaining appropriate documentation of their activities.
- o Act as a GSEP subject matter expert for any member of the Emergency Response Organization.
- o Maintain a record of GSEP related activities.

TABLE 4.3-42

MANPOWER/LOGISTICS DIRECTOR (EOF)

The Manpower/Logistics Director is the designated CECO individual who is responsible for providing administrative, logistic, communications, and personnel support for the emergency response operations. The Manpower/Logistics Director shall report to the Advisory Support Director.

Responsibilities assigned to the Manpower/Logistics Director include:

- o Direct the activities of the Communications Director and the Computer Specialist(s). ~~Also functionally direct the activities of the Corporate Manpower and Logistics Director located at the CECF to obtain assistance in fulfilling the responsibilities listed above.~~
- o Serve as purchasing agent for the EOF Organization with the responsibility for contract negotiation/administration and material control.
- o Direct the clerical staff and ensure the clerical requirements for the other Directors, at the EOF, are met.
- o Obtain continual shift staffing requirements from appropriate EOF Directors as necessary to coordinate the scheduling of relief individuals.
- o Coordinate with the TSC's Administrative Director in ensuring that clerical support is obtained for the EOF and Emergency News Center Organization. These personnel should be obtained from a station or facility not affected by the emergency.
- o Obtain services as appropriate to support operation of the EOF such as, accommodations, office support services, food services and waste disposal.
- o Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.
- o Initiate use of the special emergency response function number to charge emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.

(continued next page)

4.4 Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities

4.4.1 Criteria for Assuming Command and Control

Emergency personnel assume responsibility for their positions upon receiving notification to activate. Some will perform tasks related to fulfilling their responsibilities before arriving at an emergency facility. The command and control function, however, does not transfer from Control Room to TSC, from TSC to CEOF, from TSC to EOF, or from CEOF to EOF until certain criteria have been met. These criteria are:

1. Minimum staffing levels are met and sufficient personnel are available in the facility to determine classifications, to determine recommended protective actions, to notify state and local agencies and to maintain communications. (In the case of the Control Room, personnel are on-site 24 hours a day.)
2. Personnel in the facility have been fully briefed as to the status of the event and the currently proposed plan of action.
3. A formal statement of turnover between Shift Engineer and Station Director, between Station Director and Manager of Emergency Operations/Corporate MEO or between Corporate MEO and MEO have been made.

4.4.2 Essential Activities of the Command and Control ERF

The essential activities that must be performed once command and control has been assumed by an ERF are as follows:

- o Determine ~~proper~~ Emergency Action Level classification.
- o Determine ~~proper recommended protective actions~~ Protective Action Recommendations (PARs) for the public and inplant workers.
- o Notify state, local and federal agencies as appropriate.
- o Maintain communications with their source of information.

4.4.3 Control Room/Station Minimum Staffing

For Nuclear Power Plants with a single Control Room, the minimum shift manning requirements for emergencies are determined by the number of operating Units (see Table 4.4-1). Since requirements for normal plant operations are the same as those shown in Table 4.4-1, the minimum staff will be on-site at all times to respond to emergencies.

NOTE

 * Shift manning requirements for operating modes other than *
 * normal on-line operation are governed by plant Technical *
 * Specifications. *

CEOF Minimum Staffing

~~The minimum staff for the Corporate EOF is as follows:~~

- ~~o Corporate Manager of Emergency Operations.~~
- ~~o Corporate Technical Support Manager or Corporate Advisory Support Manager~~
- ~~o Corporate Protective Measures Director.~~
- ~~o One other Director~~

The full CEOF Organization described in Section 4.3.1 shall be present before the CEOF assumes Command and Control responsibilities. This staff parallels the EOF Minimum Staff capabilities.

EOF Minimum Staffing

The minimum staff for the Emergency Operations Facility is as follows:

- o Manager of Emergency Operations (EOF)
- o Technical Support Manager (EOF) , ~~Technical Support Director or Design and Construction Support Director~~
- o One other member of the Technical Group from Figure 4.3-2
- o Protective Measures Director (EOF) ~~or Environmental Emergency Coordinator.~~
- o Environmental Emergency Coordinator (EOF)
- o ODCS Specialist (EOF)
- o Advisory Support Manager (EOF) , ~~Advisory Support Director or Governmental Support Director.~~
- ~~o Enviroens Director. (Enviroens Director may function from either the TSC or the EOF.)~~
- ~~o One other Director or Communicator.~~
- o Emergency Planner (EOF)

4.4.6 Nondelegable Responsibilities of Command and Control

Regardless of the facilities activated during any emergency, the Director or Manager in Command and Control of the Emergency Response at any given time, shall maintain the following nondelegable responsibilities:

- 1) Final decision to declare the emergency classification.
- 2) Final decision to notify and make PARs to offsite authorities and ~~issuance of potassium iodide to CECo emergency workers and onsite personnel.~~
- 3) Authorization of personnel exposure beyond 10CFR20 limits under emergency conditions.
- 4) ~~Decision to request assistance from the Department of Energy, Chicago Operations office.~~ Issuance of thyroid blocking agents to CECo emergency workers and onsite personnel.

4.7.3 Federal Radiological Preparedness Coordinating Committee (FRPCC)

The Federal Radiological Preparedness Coordinating Committee consists of the Federal Emergency Management Agency, which chairs the Committee, the Nuclear Regulatory Commission, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Department of Defense, the Department of Agriculture, the Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. The FRPCC shall assist FEMA in providing policy direction for the program of Federal assistance to State and local governments in their radiological emergency planning and preparedness activities.

4.7.4 Department of Energy (D.O.E.) Chicago Operations Office

The Department of Energy has extensive radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident.

Upon request, the Department of Energy (DOE) Chicago Operations Office will provide assistance to Commonwealth Edison following a radiological incident as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The objective of the DOE Chicago Operations Office would be to rapidly dispatch a team of specialists to the incident site where the team would:

- 1) Make needed radiological assistance available to the general public, State and local governments, and Federal agencies;
- 2) Provide a framework through which Federal agencies will coordinate their emergency monitoring and assessment activities in support of State and local governments radiological monitoring and assessment activities; and
- 3) Assist State and local governments in preparing for radiological emergencies by describing Federal radiological assistance responsibilities and capabilities.
- 4) Establish a Federal Radiological Monitoring and Assessment Center, as necessary, from which it will manage its activities.

~~If Commonwealth Edison deems that assistance from DOE is necessary or desirable, the Manager of Emergency operations, the Corporate MEO, or the Station Director would notify the DOE Chicago Operations Office. Assistance provided by DOE shall not abridge State or local authority. the affected State(s) would notify the DOE Chicago Operations Office.~~

The primary mechanisms utilized for notifications and transmittal of information include the State of Illinois NARS Form, the NRC Event Notification Worksheet and the State Agency Update Checklist. The reporting requirements and the use of these forms will be described below:

NOTE

 * The offsite notification requirements for NARS, NRC Event *
 * Notification Worksheet and State Agency Update Checklists *
 * are the responsibility of the facility in Command and Control. *
 * of the emergency response. The NRC ENS and HPN notification *
 * responsibilities shall remain with the Station until the EOP *
 * assumes Command and Control. Other activated facilities shall *
 * assist in the acquisition of information on these forms. *

6.1.1.1 State of Illinois NARS Form

A NARS Form (Figure 6.1-1a) shall be utilized to transmit information to appropriate State and local agencies within fifteen minutes of event declaration. (See Section 5.0). All NARS messages shall be reported in the format of the current NARS Form. The format and content of the NARS Form must be mutually agreed to by the Directors of Illinois Emergency Services and Disaster Agency (IESDA) and Illinois Department of Nuclear Safety (IDNS) and the General Manager of Nuclear Services before its use. The NARS Form is a State of Illinois form included in the GSEP to aid the reader in understanding the reporting concept. The NARS Form, including instructions for its use on the reverse side, is included in this Section.

This form is not subject to onsite or offsite review.

6.1.1.2 NRC Event Notification Worksheet

An NRC Event Notification Worksheet should be utilized to transmit information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. A copy of the Event Notification Worksheet is not included in this plan, but should be available in all locations containing an Emergency Notification System phone.

This form is not subject to onsite or offsite review.

TABLE 6.1-1
PRIMARY EMERGENCY RESPONSE ACTIONS FOR UNUSUAL EVENT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated if deemed appropriate.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant.
- o Terminate if conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide periodic State Agency Updates.

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information, as appropriate
- b. Immediately notify the Nuclear Duty Officer

TABLE 6.1-2
PRIMARY EMERGENCY RESPONSE ACTIONS FOR ALERT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECO personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Downgrade to Unusual Event if conditions warrant.
- o Enter Recovery or terminate as conditions warrant.
- ~~o Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.

TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information
- b. Immediately notify the Nuclear Duty Officer
- c. If CEOF or EOF assumes command and control, then report to ~~EMEO or MEO~~ (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

- a. Call affected station - verify plant status and event classification
- ~~b. Notify appropriate company personnel~~

NOTE

 * If a Significant Alert classification is declared, then the CEOF *
 * Organization shall be activated. *

- ~~e.b. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations) if deemed appropriate as required.~~
- ~~c. If an EOF is to be activated, ensure access control is initiated.~~
- d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.
- ~~e. Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation, if deemed appropriate.~~
- ~~f. If EOF is to be activated, ensure access control is initiated.~~

4) CORPORATE MANAGER OF EMERGENCY OPERATIONS/MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.
- b. Direct the overall Company response to the emergency event.

TABLE 6.1-3
PRIMARY EMERGENCY RESPONSE ACTIONS FOR SITE EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

- a. Prior to initial notifications:
- o Assess, respond and mitigate immediate emergency
 - o Evaluate the emergency conditions
 - o Classify the event (nondelegable responsibility of Command and Control)
 - o Evaluate impact to health and safety of the public
 - o Evaluate health and safety of CECo personnel
 - o Evaluate meteorological and environmental conditions
 - o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
 - o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
 - o Initiate assembly and accountability.
- b. Authorize initial notifications to the following (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)
- o System Power Dispatcher
 - o Illinois ESDA
 - o Illinois DNS
 - o Wisconsin DEG (Zion only)
 - o Iowa DSD (Quad Cities only)
 - o Local and County agencies as appropriate
 - o NRC Operations Center
- c. After initial notifications:
- o Maintain communications with NRC Operations Center as requested.
 - o Ensure Station TSC and OSC are activated.
 - o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
 - o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
 - o Upgrade classification if conditions warrant. Do not downgrade.
 - o Enter Recovery or Terminate as conditions warrant.
 - o ~~Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
 - o Provide periodic State Agency Updates.
 - o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
 - o Dispatch environs monitoring teams
 - o Conduct evacuation of non-essential personnel

TABLE 6.1-3 (CONT)

- 2) SYSTEM POWER DISPATCHER
- a. Record NARS form information
 - b. Immediately notify the Nuclear Duty Officer
 - c. When CEOF or EOF assumes command and control, then report to EMEO (CEOF or EOF) or MEO.
- 3) NUCLEAR DUTY OFFICER
- a. ~~Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations). Call affected station - verify plant status and event classification~~
 - b. ~~Call affected station - verify plant status and event classification~~ Notify appropriate Company personnel.
 - c. ~~Ensure EOF access control has been initiated. Initiate activation of Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations)~~
 - d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.
 - e. ~~Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation.~~
 - f. ~~Ensure EOF access control has been initiated.~~
- 4) CORPORATE MANAGER OF EMERGENCY OPERATIONS/MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)
- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.
 - b. Direct the overall Company response to the emergency event.

TABLE 6.1-4
PRIMARY EMERGENCY RESPONSE ACTIONS FOR GENERAL EMERGENCY

1) ACTING STATION DIRECTOR/STATION DIRECTOR

- a. Prior to initial notifications:
- o Assess, respond and mitigate immediate emergency
 - o Evaluate the emergency conditions
 - o Classify the event (nondelegable responsibility of Command and Control)
 - o Evaluate impact to health and safety of the public
 - o Evaluate health and safety of CECO personnel
 - o Evaluate meteorological and environmental conditions
 - o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
 - o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
 - o Initiate assembly and accountability.
- b. Authorize initial notifications to the following (nondelegable responsibility of Command and Control)
- o System Power Dispatcher
 - o Illinois ESDA
 - o Illinois DNS
 - o Wisconsin DEG (Zion only)
 - o Iowa DSD (Quad Cities only)
 - o Local and County agencies as appropriate
 - o NRC Operations Center
- c. After initial notifications:
- o Maintain communications with NRC Operations Center as requested.
 - o Ensure Station TSC and OSC are activated, if deemed appropriate.
 - o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
 - o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
 - o Do not downgrade classification.
 - o Enter Recovery or Terminate as conditions warrant.
 - o ~~Request assistance from the Department of Energy, as necessary (nondelegable responsibility of Command and Control)~~
 - o Provide State Agency Updates.
 - o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
 - o Dispatch environs monitoring teams
 - o Conduct evacuation of non-essential personnel

TABLE 6.1-4 (CONT)

- 2) SYSTEM POWER DISPATCHER
- a. Record NARS form information
 - b. Immediately notify the Nuclear Duty Officer
 - c. When CEOF or EOF assumes command and control, then report to CMEO (CEO of EOF) or MEO.
- 3) NUCLEAR DUTY OFFICER
- a. ~~Initiate activation of the Corporate Emergency Response Organization (CEO, EOF and/or ENC Organizations). Call affected station - verify plant status and event classification~~
 - b. ~~Call affected station - verify plant status and event classification~~ Notify appropriate Company personnel.
 - c. ~~Ensure EOF access control has been initiated. Initiate activation of Corporate Emergency Response Organization (CEO, EOF and/or ENC Organizations)~~
 - d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.
 - e. ~~Ensure Corporate Emergency Preparedness dispatches personnel to prepare the EOF for activation.~~
 - f. ~~Ensure EOF access control has been initiated.~~
- 4) CORPORATE MANAGER OF EMERGENCY OPERATIONS/MANAGER OF EMERGENCY OPERATIONS (CEO and EOF)
- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.
 - b. Direct the overall Company response to the emergency event.

TABLE 6.1-5

PRIMARY EMERGENCY RESPONSE ACTIONS FOR RECOVERY

- 1) STATION DIRECTOR/CORPORATE MEO/MANAGER OF EMERGENCY OPERATIONS (CEO or EOP)
- a. Evaluate the guidance in Section 5.0 of this plan to determine if Recovery is appropriate.
 - b. Declare Recovery to be in effect (nondelegable responsibility of Command and Control)
 - c. Ensure notification of the following:
 - o System Power Dispatcher
 - o Illinois ESDA and DNS
 - o Iowa Disaster Services Division (for Quad Cities Station only)
 - o Wisconsin Division of Emergency Government (for Zion Station only)
 - o Contiguous local authorities as required
 - o NRC
 - o ANI
 - o INPO
 - d. Evaluate parameters, environmental conditions and other information to determine what long-term organization is required for Recovery.
 - e. Schedule personnel, material, and equipment necessary to support Recovery.
 - f. Provide mechanisms, if required, for periodic plant status and meteorological information to ESDA/DNS and contiguous state authorities.
 - g. Determine level of activation and/or manning of emergency response facilities if preplanned events are to occur that have a potential (possibility) of impacting upon the health and safety of the public, CECO personnel, plant equipment, and/or the environment.
 - h. With the concurrence and approval of the Senior Vice President, Nuclear Operations, modify the Station Emergency Response Organization (i.e., Control Room, OSC and TSC) and the Corporate Emergency Response Organization (i.e., CEOF, EOP, and Emergency News Center) as necessary to support recovery efforts.

7.1.4 Corporate EOF (CEOF)

The CEOF Corporate EOF (CEOF) is the location from which the Corporate Manager of Emergency Operations (CEOF) will direct a staff in evaluating, coordinating, and directing the overall company activities involved in coping with an emergency. ~~The CEOF is normally only activated during regular company working hours, 8:00 a.m. to 4:30 p.m., Monday through Friday. Activation of the CEOF is mandatory upon Declaration of a Significant Alert, a Site Emergency or General Emergency.~~

~~When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.~~

~~At a Site or General Emergency, the CEOF staff, if activated, shall be relieved when the affected Station's EOF is manned. At that time, certain CEOF staff may be asked to make themselves available as support staff to the EOF.~~

~~The CEOF is also the official backup EOF for Zion Station. The command center located in the Edison Building (formerly the CCC) shall remain the official backup EOF for Zion Station. The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.~~

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- o Technical Support personnel
- o Advisory Support personnel
- o Environmental Assessment personnel
- o Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

7.1.5 Emergency Operations Facility (EOF) (cont'd)

The four (4) primary EOFs (Mazon EOF to serve Dresden, Braidwood and LaSalle County Stations, Dixon EOF for Byron Station, Morrison EOF for Quad Cities Station, and Zion EOF for Zion Station) are constructed according to the design criteria such that:

- 1) The location provides optimum functional and availability characteristics for carrying out overall strategic direction of CECo onsite and support operations, determination of public protective actions to be recommended to offsite officials, and coordination with Federal, State and local organizations.
- 2) They are well engineered for the design life of the plant and are of sufficient size to accommodate about 50 people. The Zion Station EOF, because of its close proximity to the station, is provided with additional radiological protection features. It also has a backup facility located in Downers Grove should the EOF become uninhabitable.
- 3) They are equipped with reliable voice communications capabilities to the TSC, the OSC, the CEOF, the Control Room, NRC, and State and local emergency operations centers. In addition, each EOF has facsimile transmission capability.
- 4) Equipment is provided to gather, store, and display data needed in the EOF to analyze and exchange information on plant conditions with the Station Director in the TSC.
- 5) The EOF technical data system receives, stores, processes, and displays information sufficient to perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition.
- 6) They have ready access to plant records, procedures, and emergency plans needed for effective overall management of CECo emergency response resources.

7.1.6 JOINT PUBLIC INFORMATION CENTER (JPIC)

The Joint Public Information Center (JPIC) is the facility in which media personnel gather to receive information related to the emergency event. The JPIC may or may not be in the same physical location as the EOF.

Emergency News personnel operate from the Joint Public Information Center (JPIC), which is under the direction of the Public Information Manager and functions as the single point contact to interface with Federal, State, and local authorities who are responsible for disseminating information to the public. The Public Information Manager and appropriate technical spokespersons shall be available to brief the press at the JPIC.

7.2 Communication Systems

CECo has extensive and reliable communication systems installed at its generating stations, System Power Supply Office, Corporate Headquarters, and Division load dispatching offices. These systems include the use of normal and dedicated telephone lines on land lines and microwave voice channels, mobile radio units, handi-talkies, and computer peripherals. For the purposes of emergency communications, the system is addressed in terms of functional areas as described in the following sections.

7.2.1 Nuclear Accident Reporting System (NARS)

The Nuclear Accident Reporting System (NARS) is a dedicated telephone voice communications system that has been installed for the purpose of notifying State and local authorities of declared nuclear emergencies. This phone is normally colored green. This system links together the station Control Rooms, the CEOF, EOFs, TSCs, System Power Supply Office, and State and local authorities as appropriate.

Illinois ESDA and Illinois DNS, in cooperation with Commonwealth Edison, are responsible for the development and execution of all steps necessary to ensure continuous operation of the NARS.

7.2.2 Dedicated Emergency Response Facility (ERF) Communication Systems

NOTE

~~The CEOF (Downers Grove) will not have microwave capabilities until installation of a fiber optics link is completed. Microwave voice channels, PL, Alternate GSEP lines and GSEP radio will not be available until this time.~~

CECo has established several dedicated communication systems that ensure reliable and timely exchange of information necessary to provide effective command and control over any emergency response. These systems include:

- o A microwave voice channel between the CEOF and the Station Control Room, the TSC, and the EOF at each nuclear station. This phone is normally colored gray.

This phone is referred to as the Alternate GSEP Phone. (See Figure 7.2-1)
- o A telephone link that enables communication between the CEOF, the TSC, and the EOF. This phone is normally colored yellow and is referred to as the GSEP Phone. (See Figure 7.2-1)
- o Party Line (PL) communications that enable personnel of the same discipline to conference from up to six different locations at the same time. Designated PL lines are as follows:
 - (PL-1) Health Physics Party Line
 - (PL-2) Environmental Party Line
 - (PL-3) Technical Party Line
 These lines are normally colored Blue and are located in various ERFs and Company Offices.

The Following Section

Depicts the Changes as

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7B	[UPON GSEP-92-01 AND GSEP-93-01 APPROVAL]	

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2.28 PROBABLE

Supported by evidence strong enough to establish presumption but not proof; an event that is likely to occur; the probability that an event will occur is greater than or equal to 50%.

2.29 PROJECTED DOSE

That calculated dose commitment that some individuals in the population group may receive if no protective actions are implemented. Projected doses are calculated to establish an upper limit boundary.

2.30 PROTECTED AREA

That onsite area within the security boundary as defined in each station's Security Plan.

2.31 PROTECTIVE ACTION GUIDES (PAG)

Projected radiological dose or dose commitment values to individuals in the general population that warrant protective action.

Protective Action Guides are criteria used to determine if the general population needs protective action regarding projected radiological doses, or from actual committed (measured) dose values.

2.32 PROTECTIVE ACTION RECOMMENDATIONS (PARS)

Recommended actions to the States for the protection of the offsite public from whole body external gamma radiation, and inhalation and ingestion of radioactive materials. Typical PARS include recommendations for sheltering, evacuation, access control and other recommendations concerning the safeguards of affected food chain processes.

2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 SIGNIFICANT ALERT

Those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5.

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

- * The CEOF Organization
- * The EOF Organization
- * The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEOF) and Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal, State, and local authorities.

The CEOF will be activated at a Significant Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).

The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the Manager of Emergency Operations. The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control. Once the EOF Organization is activated, the CEOF Organization becomes support staff to the EOF. (See Section 4.0).

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the Manager of Emergency Operations (CEO) will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of a Significant Alert, Site Emergency or General Emergency. When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, Manager of Emergency Operations (CEO) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove.

Recommended organization and staffing for the OSC during extended emergency events (i.e., events lasting longer than twenty-four hours) are shown in figures included with this section.

NOTE:

The OSC shall remain activated during events classified as Site Emergency and General Emergency. The OSC may be de-activated at the Alert level if deemed unnecessary by the Acting Station Director/Station Director.

All Station Emergency Response Organization personnel shall have the authority to perform assigned duties in a manner consistent with the objectives of this plan. The major responsibilities and duties of these personnel are given in the following tables:

- Table 4.2-1 - Acting Station Director/Station Director
- Table 4.2-2 - Assistant Station Director
- Table 4.2-3 - State/NARS Communicator
- Table 4.2-4 - Operations Director
- Table 4.2-5 - Control Room Communicator (in the TSC)
- Table 4.2-6 - Operational Support Center Director
- Table 4.2-7 - Operational Support Center Supervisor
- Table 4.2-8 - Technical Director
- Table 4.2-9 - Technical Communicator (to CEOF/EOF)
- Table 4.2-10 - ENS Communicator
- Table 4.2-11 - TSC Technical Status Board Recorders
- Table 4.2-12 - Administrative Director
- Table 4.2-13 - Radiation Protection Director
- Table 4.2-14 - Chemistry Director
- Table 4.2-15 - HPN Communicator
- Table 4.2-16 - TSC Environs Director
- Table 4.2-17 - TSC ODCS Specialist
- Table 4.2-18 - Maintenance Director
- Table 4.2-19 - Stores Director
- Table 4.2-20 - Security Director

TABLE 4.2-1 (cont'd)

ACTING STATION DIRECTOR/STATION DIRECTORPART B) STATION DIRECTOR (TSC) RESPONSIBILITIES WITH THE CORPORATE EOF OR EMERGENCY OPERATIONS FACILITY IN COMMAND AND CONTROL INCLUDE:

- o Keep the Manager of Emergency Operations (CEOF or EOF) and NRC informed as to the status of the plant.
- o Assist the MEO (CEOF or EOF) in the acquisition of information for the NARS, NRC Event Notification Worksheet and State Agency Update Checklist.
- o Provide information and recommendations to the MEO (CEOF or EOF).
- o Implement plans, procedures and schedules to meet emergency response objectives as directed by the MEO (CEOF or EOF).
- o Request from the Corporate Emergency Response Organization any additional material, manpower and equipment needed to implement response plans and operations.
- o Continue to supervise the Station Emergency Response Organization (i.e. Control Room, OSC and TSC).
- o Provide a station Senior Reactor Operator (SRO) for the EOF as requested by the MEO or Nuclear Duty Officer.
- o Maintain a record of GSEP related activities.

TABLE 4.2-9

TECHNICAL COMMUNICATOR (TO CEOF/EOF)

The TSC Communicators are responsible for transmitting/receiving information to and from the TSC.

General responsibilities assigned to all TSC Communicators include:

- o Establish communications with appropriate parties as directed by the responsible Director.
- o Transmit information that has been reviewed and/or approved by the responsible Director.
- o Document time, date and information being transmitted or received on appropriate forms.
- o Record and relay inquiries to responsible Directors and the responses to those inquiries.
- o Assist appropriate Directors in maintaining proper records and logs of GSEP related activities.

SPECIFIC DUTIES ASSIGNED TO THE
TECHNICAL COMMUNICATOR (TO CEOF/EOF) INCLUDE:

- o Report to TSC Technical Director.
- o Establish and maintain contact with the Technical Specialist (CEOF) and/or the Technical Communicator at the EOF.
- o Provide CEOF/EOF with Plant Status Information as directed by the TSC Technical Director.

TABLE 4.2-16

TSC ENVIRONS DIRECTOR (TSC)

The TSC Environs Director reports to the Radiation Protection Director and supervises the activities of CECO Environmental Sampling Teams in an emergency. Once the EOF Environs Director has taken control of the Environmental Sampling Teams, the TSC Environs Director will continue to monitor offsite environmental data and will assist the Radiation Protection Director as deemed appropriate.

Responsibilities assigned to the TSC Environs Director include:

- o Supervise the activities of the ODCS Specialist.
- o Assemble one or more environmental monitoring teams, and track these individuals accumulated dose.
- o Dispatch and coordinate the activities of CECO Environmental Monitoring Teams. This includes:
 - Dose rate surveys (including plume tracking);
 - Air sampling;
 - Soil, water, and vegetation sampling;
 - Contamination surveys; and
 - Exchange of TLDs and filter cartridges from fixed environmental stations.
- o Accumulate, tabulate, and evaluate environmental and radiological data.
- o Request additional environmental personnel and/or equipment, as necessary. This includes:
 - Assistance for road blocks and security until State, County and Local personnel are available;
 - Obtain communications equipment as necessary. Telephones, mobile radios, and portable radios may be required;
 - Obtain required transportation for personnel; and
 - Obtain sufficient technical and nontechnical personnel to expand the operation as necessary.
- o Transfer command of the Environs Field Teams to the EOF/CEOF Environs Director when appropriate. The Protective Measures Director (CEOF) may take command of the Environmental Field Teams if agreed upon by the MEO (CEOF) and the Station Director or the MEO (EOF).
- o Make appropriate Protective Action Recommendations for the public to the Radiation Protection Director.
- o Maintain a record of GSEP related activities.

TABLE 4.2-20

SECURITY DIRECTOR (TSC)

The Security Director maintains plant security and personnel accountability at the nuclear station. The Security Director shall report directly to the Station Director.

Responsibilities assigned to the Security Director include:

- o Maintain plant security and account for all personnel within the protected area as necessary or required.
- o Identify, for the Station Director, any nonroutine security procedures and/or contingencies that are in effect or that require a response.
- o Expedite ingress and egress of key emergency response personnel, as required.
- o Coordinate with the Radiation Protection Director in controlling ingress and egress to and from the protected area if radiological concerns are present.
- o Provide for access control to the Control Room, TSC and OSC, as appropriate.
- o Initiate security at the EOF and JPIC if it is requested by the MEO (CEO) or the Station Director. It shall be the responsibility of the Security Director to contact an Access Control Coordinator and to notify the Corporate Nuclear Security Administrator. Access Control Coordinators are listed in the GSEP telephone directory.
- o Provide an escort and expedite ingress, as necessary, for NRC Site Team personnel in conjunction with the Radiation Protection Director.
- o Act as the TSC liaison with the appropriate NRC Site Team representative.
- o Assist the Radiation Protection Director in determining personnel evacuation routes as necessary.
- o Assist the Station Director in evaluating changes in security related Emergency Action Levels (EALs).
- o Maintain a record of GSEP related activities.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

- SECTION 4.3.1 CEOF Organization
- SECTION 4.3.2 EOF Organization
- SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECO's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Significant Alerts, Site and General Emergencies. CEOF activation for other Alerts or Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEOF).

NOTE:

The roles of the System Power Supply Office and the Nuclear Duty Officer are unique in that they may be considered as parts of the overall Corporate Emergency Response, but do not hold specifically identified positions within the CEOF Organization, the EOF Organization, or the ENC Organization. For a description of their general responsibilities as they pertain to the GSEP, refer to the following referenced Tables:

- Table 4.3-1 System Power Supply Office
- Table 4.3-2 Nuclear Duty Officer

NOTE:

The Emergency Restoration of Power (ERP) Director is a position that coordinates with the Corporate Emergency Response Organization. The ERP Director works with the Nuclear Duty Officer when the CEOF is activated and the Manpower/Logistics Director (EOF) when the EOF is activated. This organizational relationship is depicted on the Organization charts by a dotted line. For a description of the general responsibilities of the ERP Director as they pertain to the GSEP, refer to the following referenced Table:

- Table 4.3-11 ERP Director

4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control, there are several factors differentiating the CEOF and EOF Organizations:

- 1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.
- 2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.
- 3) The CEOF would likely be the CECO facility utilized during daytime hours for Corporate Response to Transportation Accidents. (This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).
- 4) The CEOF Organization shall be activated when a Significant Alert, a Site Emergency or a General Emergency is declared.
- 5) The CEOF may assume the nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies until the EOF is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEO) and Station Director.
- 6) When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, after Command and Control is transferred to the EOF.
- 7) The CEOF should not assume ENS/HPN communications responsibilities

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3	MANAGER OF EMERGENCY OPERATIONS (CEO)
Table 4.3-4	TECHNICAL SUPPORT MANAGER (CEO)
Table 4.3-5	TECHNICAL SPECIALIST (CEO)
Table 4.3-6	PROTECTIVE MEASURES DIRECTOR (CEO)
Table 4.3-7	HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEO)
Table 4.3-8	ADVISORY SUPPORT MANAGER (CEO)
Table 4.3-9	EMERGENCY PLANNER (CEO)
Table 4.3-10	INTENTIONALLY BLANK

FIGURE 4.3-1
THE CEOF ORGANIZATION

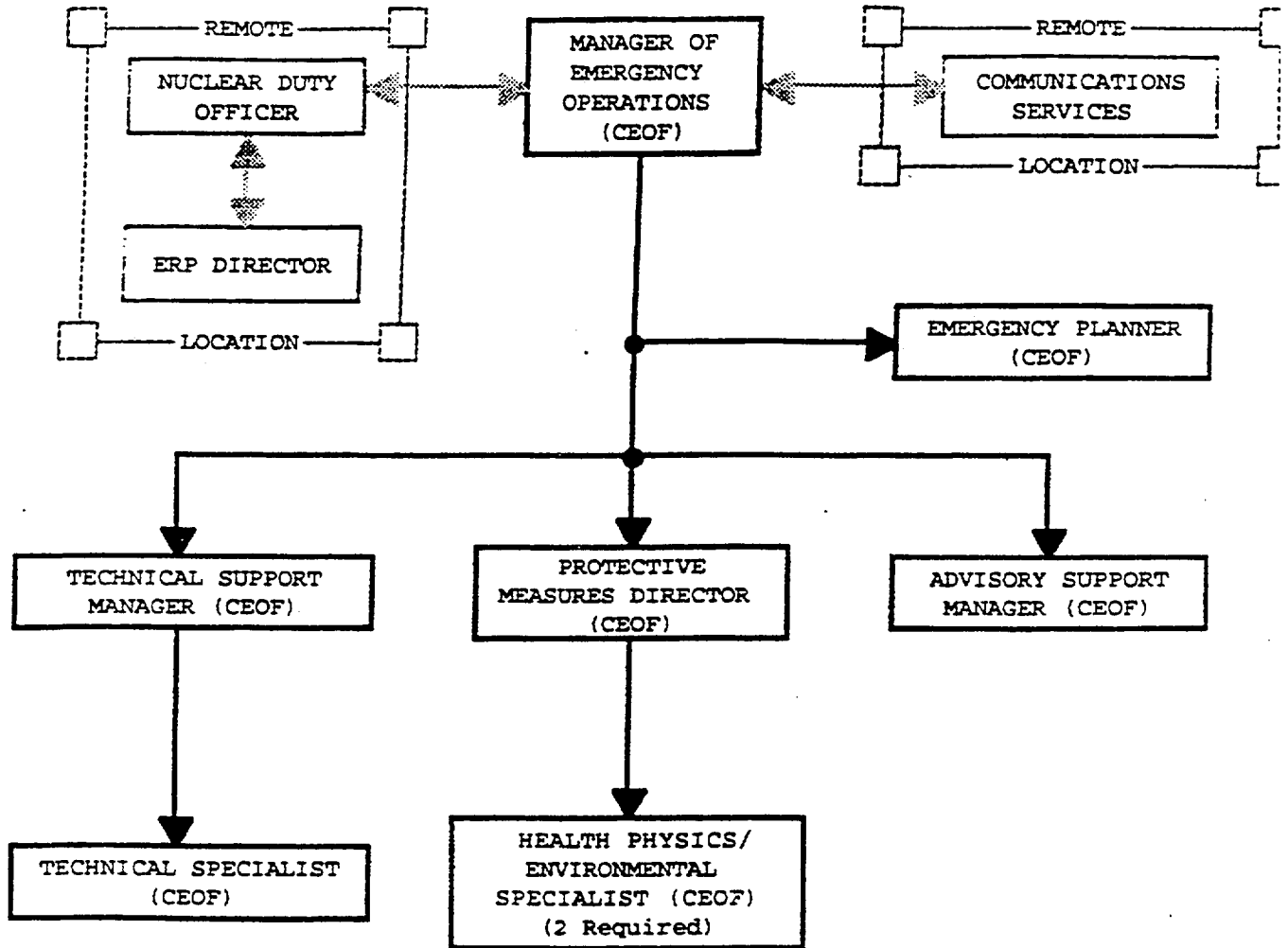


TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECO individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

- a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.
- b. Verify that all appropriate notifications have been made.
- c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.
- d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.
- e. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.
- f. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

- a. Complete all actions as listed above in part 1).
- b. Notify ANI and INPO within eight (8) hours of event classification.
- c. If the Alert Classification is determined to be a Significant Alert, activate the CEOF Organization.
- d. When the CEOF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.

3) ACTIONS FOR SITE AND GENERAL EMERGENCIES

- a. Activate the Corporate Emergency Response Organization (CEOF and EOF and ENC Organizations). The NDO's responsibilities shall include all the actions identified in 1) and 2) above.
- b. Notify the Communications Services Duty Officer (CSDO) and prior to the activation of the Emergency News Center Organization, review any news releases for accuracy.

4) ACTIONS FOR A TRANSPORTATION ACCIDENT

- a. Complete actions a, b and e as listed above in part 1).
- b. Notify ANI and INPO within eight (8) hours of the accident.
- c. Maintain a record of activities.

NOTE:

The NDO's function is to determine the degree of Corporate assistance required to control and mitigate emergency events. Additionally, it is the NDO's responsibility to initiate Corporate assistance, by activating those parts of the Corporate Emergency Response Organization, (CEOF and/or EOF and ENC Organizations), which the NDO deems appropriate or are required by Company procedures.

For more specific duties and responsibilities of the NDO in regards to response to generating station and utility emergencies, refer to the current NDO's Corporate Emergency Plan Implementing Procedure (CEPIP).

TABLE 4.3-3

MANAGER OF EMERGENCY OPERATIONS (CEOF)

The MEO (CEOF), when in Command and Control, will direct CECO's Emergency Response activities until such time when (and if) the EOF Organization assumes Command and Control. When the EOF Organization assumes Command and Control, the MEO (CEOF) and Staff will remain in place as a support group for the Manager of Emergency Operations (EOF).

When the TSC has Command and Control, assume the ongoing responsibilities assigned to the MEO (CEOF), including :

- o Direct the CEOF Organization shown in Figure 4.3-1 and coordinate all CECO activities involved in coping with the emergency.
- o Coordinate CECO press releases with the Nuclear Duty Officer and Communications Services, as appropriate.
- o Request assistance from non-CECO emergency response organizations, as required.
- o Evaluate the need, based on events in progress, to staff the EOF to provide additional support to the Station.
- o Maintain a record of the GSEP related activities.

When the CEOF assumes Command and Control, assume the additional responsibilities assigned to the MEO (CEOF) including:

- o All nondelegable responsibilities of Command and Control as delineated in Section 4.4.6 of this plan.
- o Ensure State Agency Update Checklists are completed and transmitted on an hourly basis.
- o Approve the contents of the NARS form prior to transmittal.
- o Notify appropriate State and local agencies of emergency conditions in accordance with Section 6.0 of this plan.
- o Ensure that appropriate measures are taken Onsite to:
 - Terminate the condition causing the emergency.
 - Protect employees and the public.
 - Effect post accident recovery and deactivate the Emergency Response Organization when appropriate.

After the EOF Organization assumes Command and Control:

- o Remain at the CEOF and provide assistance to the Station Director and Manager of Emergency Operations (EOF) .

TABLE 4.3-4

TECHNICAL SUPPORT MANAGER (CEOF)

The Technical Support Manager (CEOF) reports to the MEO (CEOF). The TSM (CEOF) will direct the activities of the Technical Specialist (CEOF) and will coordinate the engineering services necessary for plant modifications, special equipment arrangement, shielding, containers, or other devices needed during the emergency. When the EOF Organization assumes Command and Control, the TSM (CEOF) will functionally report to the Technical Support Manager (EOF).

Responsibilities assigned to the Technical Support Manager (CEOF) include:

- o Provide recommendations for changes in Emergency Action Level classification to the MEO(CEOF).
- o Provide information concerning the status of plant operations and recommendations for mitigating the consequences of the accident.
- o Assist in completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- o Assist in the development of post-accident recovery measures.
- o Advise the MEO (CEOF) of the need to staff the EOF based on degrading plant conditions.
- o Maintain a record of GSEP related activities.

TABLE 4.3-5

TECHNICAL SPECIALIST (CEOF)

The Technical Specialist (CEOF) is responsible for obtaining and disseminating plant condition and status information in the CEOF. The Technical Specialist (CEOF) reports to the Technical Support Manager (CEOF).

Responsibilities assigned to the Technical Specialist (CEOF) include:

- Ensure that critical parameters are identified and trended utilizing the Safety Parameter Display System (SPDS), Point History (PTHSTY) and Point Trend programs.
- Advise the TSM (CEOF) of changes in Emergency Action Level (EAL) classification based on plant conditions or parameters.
- Establish contact with the Technical Communicator (TO CEOF/EOF).
- Obtain plant status information.
- Maintain a record of GSEP related activities.

TABLE 4.3-6

PROTECTIVE MEASURES DIRECTOR (CEOF)

The Protective Measures Director (CEOF) reports to the MEO (CEOF) and directs the activities of the Health Physics/Environmental Specialists (CEOF). The PMD (CEOF) is cognizant of offsite sampling/monitoring activities of CECo personnel and interfaces with State personnel regarding dose assessment programs, as appropriate. The PMD (CEOF) shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposure as low as reasonably achievable. When the EOF Organization assumes Command and Control, the PMD shall serve as a support individual for the Protective Measures Director (EOF).

Responsibilities assigned to the Protective Measures Director (CEOF) include:

- o Provide recommendations for changes in radiological Emergency Action Level classification to the MEO (CEOF).
- o Maintain cognizance of environmental sampling activities .
- o Advise the MEO (CEOF) on the need for emergency exposure approval for CECo emergency workers.
- o Advise the MEO (CEOF) on the need for administering thyroid blocking agents for CECo emergency workers.
- o Based on environmental sampling or known plant releases, advise the MEO (CEOF) of Protective Action Recommendations (PARs) for plant personnel and members of the public.
- o Assist in the completion of the NARS and State Agency Update Checklist in coordination with the Station Emergency Response Organization.
- o Coordinate additional radiological support as requested by the TSC.
- o Advise the MEO (CEOF) of the need to staff the EOF based on degrading radiological or environmental conditions.
- o Act as an alternate for review and approval of the State Agency Update Checklist.
- o Determine the need for and contact Medical Department personnel for assistance.
- o Maintain a record of GSEP related activities.

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TABLE 4.3-7

HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEOF)

The Health Physics/Environmental Specialists (CEOF) reports to the Protective Measures Director (CEOF). The Health Physics/Environmental Specialists (CEOF) shall monitor onsite and offsite radiological conditions to collect and disseminate information to the CEOF staff.

Responsibilities assigned to the Health Physics/Environmental Specialists (CEOF) include:

- Identify and trend critical radiological and meteorological parameters utilizing the Point History (PTHSTY) and Point Trend programs and the meteorological contractor.
- Evaluate pertinent dose projection data using the ODCS computer models as requested by the PMD (CEOF).
- Remain cognizant of forecast data and ensure that the status is updated periodically.
- Immediately notify the PMD (CEOF) of meteorological changes which may impact identification of downwind sectors.
- Interpret radiological data and provide Protective Action Recommendations (PARs) based upon calculated dose projections to the PMD (CEOF).
- Advise the PMD (CEOF) of changes in Emergency Action Level (EAL) classification based on effluent releases or dose projections.
- Monitor the GSEP Radio transmissions to remain cognizant of the Environmental Field Team activities and radiological conditions.
- Request additional equipment and personnel as necessary to supplement environmental monitoring efforts from unaffected CECo nuclear stations and/or an environmental contractor.
- Convey information pertaining to CECo Environmental Field Team activities and sample results to State authorities.
- Coordinate information flow between the CEOF and the affected State(s) environmental authorities.
- Maintain a record of GSEP related activities.

TABLE 4.3- 8

ADVISORY SUPPORT MANAGER (CEOF)

The Advisory Support Manager (CEOF) will provide support functions in organizational logistics and governmental interface. The ASM (CEOF) also shall maintain effective interfaces between State and local agencies by providing State agencies with periodic updates. The ASM (CEOF) reports to the MEO (CEOF). When the EOF Organization assumes Command and Control, the ASM (CEOF) will functionally serve as a support individual for the Advisory Support Manager (EOF).

Responsibilities assigned to the ASM (CEOF) include:

- o Assist the MEO (CEOF) in the evaluation of the significance of an emergency with respect to the public.
- o Prepare, approve and transmit the State Agency Update Checklist at least hourly.
- o Maintain records of CEOF activities.
- o Ensure that access to the CEOF is limited to Emergency Responders.
- o Maintain a record of GSEP related activities.

TABLE 4.3-9

EMERGENCY PLANNER (CEOF)

The Emergency Planner (CEOF) is responsible for verifying that the CECO Generating Stations Emergency Plan (GSEP) is implemented effectively and assists the CEOF staff in facility utilization. The Emergency Planner (CEOF) reports to the MEO (CEOF).

Responsibilities assigned to the Emergency Planner (CEOF) include:

- o Assist in activation of the CEOF.
- o Act as a GSEP subject matter expert for the CEOF Organization.
- o Operate the audio-visual system and telecommunications in the EMC as directed by the MEO (CEOF).
- o Coordinate CEOF support services as necessary.
- o Coordinate maintenance for CEOF equipment as necessary.
- o Assist any CEOF personnel, as necessary, in using desired Computer Programs.
- o Establish shift staffing for the CEOF using the GSEP Telephone Directory.
- o Establish and maintain a CEOF Ingress/Egress Log and Fitness for Duty Verification documentation.
- o Verify that the CEOF Organization is maintaining appropriate documentation of their activities.
- o Maintain a record of GSEP related activities.

TABLE 4.3-10

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TABLE 4.3-11

EMERGENCY RESTORATION OF POWER (ERP) DIRECTOR

The Emergency Restoration of Power (ERP) Director, located in the CECo Technical Center Office in Maywood, Illinois, shall coordinate the activities of Division personnel and equipment. The ERP Director shall provide for Division support to the affected station. Upon activation of the Corporate Emergency Response Organization, the ERP Director will coordinate with either the Nuclear Duty Officer or the Manpower/Logistics Director (EOF) .

Responsibilities assigned to the ERP Director include:

- o Activate the Emergency Restoration of Power (ERP) Program as necessary to support the station activities.
- o Inform the respective Division Director of support service required to meet the needs of the emergency response.
- o Obtain additional support from other Divisions if the level of support requirements dictates.
- o Maintain a record of GSEP related activities.

4.3.2 THE EOF ORGANIZATION

During incidents classified as Site or General Emergencies, the EOF Organization will be activated. The EOF Organization functions under a Manager of Emergency Operations who is responsible for the overall company activities aimed at restoring the affected station to a safe status. The CEOF Organization provides support to the EOF Organization under the arrangement detailed in Section 4.3.1. The EOF Organization, depicted in Figure 4.3-2, consists of the following personnel whose major duties are delineated in the referenced tables.

NOTE:

Some EOF Positions are required to be double staffed when a remote JPIC, such as Highland Park, is activated. These positions are indicated with an asterisk. One responder will report to the EOF and one will report to the remote JPIC.

Table 4.3-12	Manager of Emergency Operations
Table 4.3-13	Assistant MEO
Table 4.3-14	Technical Support Manager
Table 4.3-15	Technical Support Director
Table 4.3-16	Senior Reactor Operator (at EOF)
Table 4.3-17	Waste Systems Director
Table 4.3-18	Design & Construction Support Director
Table 4.3-19	Technical Information Coordinator
Table 4.3-20	EOF Status Board Recorders
Table 4.3-21	Technical Communicator (to TSC)
Table 4.3-22	ENS Communicator
Table 4.3-23	SPDS/PTHSTY Specialist

TABLE 4.3-14

TECHNICAL SUPPORT MANAGER (EOF)

The Technical Support Manager (TSM) is the designated CECO individual who has requisite authority, nuclear experience and technical expertise to manage a technical staff in support of Emergency Response operations. The Technical Support Manager shall report directly to the Manager of Emergency Operations.

Responsibilities assigned to the TSM include:

- o Manage the activities of the Technical Support Group in the EOF.
- o Provide recommendations for changes in Emergency Action Level classification to the Manager of Emergency Operations and participate in the decision-making process.
- o Provide information to the Assistant MEO for completing the NARS Form.
- o Provide the Manager of Emergency Operations with information concerning the status of plant operations and with recommendations for mitigating the consequences of the accident.
- o Coordinate the activities of the Technical Support Manager (CEOF).
- o Supervise the activities of the Technical Support Director and monitor the progress in the performance of the Technical Support Director's responsibilities.
- o Assist in the development of post-accident recovery measures.
- o Provide technical information on the facility design.
- o Ensure that modifications needed for plant recovery are implemented in a timely manner.
- o Enlist the aid of consultants as necessary.
- o Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-25

PROTECTIVE MEASURES DIRECTOR (EOF)

The Protective Measures Director (PMD) is the designated CECo individual who is specifically qualified in the management of radiological consequence assessment and who is authorized to interact with supporting agencies. This individual will supervise the environmental assessment functions at the EOF. The Protective Measures Director shall report to the Manager of Emergency Operations.

Responsibilities assigned to the Protective Measures Director include:

- o Obtain input from the Protective Measures Coordinator concerning plant status that potentially may affect the public.
- o Advise the Manager of Emergency Operations and Advisory Support Manager/Director concerning protective action recommendations.
- o Advise the Manager of Emergency Operations and the Advisory Support Manager/Director concerning changes in accident classification based upon effluent releases or dose projections.
- o Provide information to the Assistant MEO for completing the NARS Form.
- o Coordinate the activities of the Protective Measures Director (CEOF).
- o Direct the activities of the Health Physics Director and the Environmental Emergency Coordinator and monitor the progress in the performance of their responsibilities.
- o Provide or delegate to the Environmental Emergency Coordinator the review of the Environmental portions of the State Agency Update Checklist.
- o Maintain a record of GSEP related activities or assign an individual to do so.

TABLE 4.3-26

HEALTH PHYSICS DIRECTOR (EOF)

The Health Physics Director (HPD) shall support the onsite Health Physics activities under the direction of the Protective Measures Director. The HPD shall make recommendations on dose management techniques for both onsite and offsite activities for maintaining personnel exposures as low as reasonably achievable. Responsibilities assigned to the Health Physics Director include:

- o Direct the activities of the HPN Communicator(EOF).
- o Direct the activities of any Radiation Technicians (RTs) in the EOF, as required (i.e. habitability checks, etc.)
- o Assist the affected station in the planning and coordination of activities associated with the evacuation of non-essential personnel.
- o Determine the need for additional Health Physics instrumentation, dosimetry, protective equipment, and radiological support personnel.
- o Review plant Health Physics information and make recommendations to the Protective Measures Director.
- o Assist and interface with the EOF Technical Group and the Station in the development of plans for plant surveys, sampling, shielding, and special tools in support of waste systems processing and design modification activities.
- o Keep informed of the activities of offsite environmental monitoring teams.
- o Determine the need for and contact Medical Department personnel for assistance in performing the following tasks:
 - Ensure that arrangements with appropriate hospitals have been made for patients involved in hazardous materials/radiation incidents.
 - Recommend first aid and decontamination techniques for personnel requiring aid in the emergency area.
 - Coordinate the activities of contracted radiological medical assistance personnel.
 - Analyze all available health information data pertaining to persons who have received injuries or excessive exposure to hazardous materials, including radioactivity.
 - Ensure that procedures governing the use of thyroid blocking agents have been followed by CECco emergency personnel.
 - Consult with the MEO regarding measures to protect onsite personnel and the offsite public.
- o Maintain a record of GSEP related activities.

TABLE 4.3-28

ENVIRONMENTAL EMERGENCY COORDINATOR (EOF)

The Environmental Emergency Coordinator (EEC) is the designated CECO individual who is specifically qualified in the coordination of radiological consequence assessment. The Environmental Emergency Coordinator shall report to the Protective Measures Director.

Responsibilities assigned to the Environmental Emergency Coordinator include:

- o Ensure communications are established with the Corporate EOF, and/or the TSC to obtain information on the accident conditions, meteorological conditions, and estimates of radioactive material releases.
- o Direct the activities of the Protective Measures Communicator, the State Environs Coordinator(s), and the EOF ODCS Specialist.
- o Direct the activities of the EOF Environs Director and the environmental staff. Coordinate the activities of the TSC Environs Director and environmental contractors.
- o Assist the Protective Measures Communicator in completing the Environmental portion of the State Agency update checklist.
- o Interpret radiological data and provide Protective Action Recommendations (PARs) based upon calculated dose projections consistent with this plan and ensure Environmental Status Boards are updated as necessary.
- o Identify changes in accident classification based on effluent releases or dose projections.
- o Verify that information necessary to implement offsite emergency plans is collected and provided to the Protective Measures Director, including the environmental portion of the State Agency Update Checklist.
- o Maintain a record of GSEP related activities.

TABLE 4.3-34

ADVISORY SUPPORT MANAGER (EOF)

The Advisory Support Manager (ASM) is the designated CECo individual who will manage the efforts of the Advisory Support Group located at the EOF. This group provides support functions in organizational logistics and governmental interface. The ASM shall report directly to the Manager of Emergency Operations (MEO).

Responsibilities assigned to the ASM include:

- o Assist the MEO in the evaluation of the significance of the emergency with respect to the public.
- o Assist the MEO in evaluating changes to the Emergency Classification.
- o Provide information to the Assistant MEO for completing the NARS Form, as requested.
- o Direct the activities of the ASM (CEOF).
- o Act as an alternate for the review and approval of the State Agency Update Checklist prior to transmittal.
- o Maintain records of information obtained from other EOF personnel, including contacts with offsite agencies, contractors and other support organizations.
- o Advise the MEO concerning the status of activities relating to governmental interfaces and provide recommendations for improving these interfaces.
- o Direct the activities of the Advisory Support Director and monitor the progress in the performance of the Advisory Support Director's responsibilities.
- o Maintain a record of GSEP related activities or assign a designated alternate (i.e., Advisory Support Director) to do so.

TABLE 4.3-39

EMERGENCY PLANNER (EOF)

The Emergency Planner (EOF) is responsible for verifying that the CECo Generating Station Emergency Plan (GSEP) is implemented properly. The Emergency Planner (EOF) shall serve as a support individual for the Advisory Support Director (EOF).

Responsibilities assigned to the Emergency Planner (EOF) include:

- o Monitor information flow within the EOF organization to ensure information requirements are being met.
- o Assess the effectiveness of ongoing EOF working relationships and recommend functional enhancements to the Advisory Support Director.
- o Verify that the EOF Organization is maintaining appropriate documentation of their activities.
- o Act as a GSEP subject matter expert for any member of the Emergency Response Organization.
- o Maintain a record of GSEP related activities.

TABLE 4.3-42

MANPOWER/LOGISTICS DIRECTOR (EOF)

The Manpower/Logistics Director is the designated CECo individual who is responsible for providing administrative, logistic, communications, and personnel support for the emergency response operations. The Manpower/Logistics Director shall report to the Advisory Support Director.

Responsibilities assigned to the Manpower/Logistics Director include:

- o Direc. the activities of the Communications Director and the Computer Specialist(s).
- o Serve as purchasing agent for the EOF Organization with the responsibility for contract negotiation/administration and material control.
- o Direct the clerical staff and ensure the clerical requirements for the other Directors, at the EOF, are met.
- o Obtain continual shift staffing requirements from appropriate EOF Directors as necessary to coordinate the scheduling of relief individuals.
- o Coordinate with the TSC's Administrative Director in ensuring that clerical support is obtained for the EOF and Emergency News Center Organization. These personnel should be obtained from a station or facility not affected by the emergency.
- o Obtain services as appropriate to support operation of the EOF such as, accommodations, office support services, food services and waste disposal.
- o Obtain support from Industrial Relations, the Comptroller's office, the Legal Department, the Accounting Department and others as required.
- o Initiate use of the special emergency response function number to charge emergency response costs and make provisions to establish a proper method of accounting for costs of contractual services and other expenditures related to the emergency.

(continued next page)

4.4 Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities

4.4.1 Criteria for Assuming Command and Control

Emergency personnel assume responsibility for their positions upon receiving notification to activate. Some will perform tasks related to fulfilling their responsibilities before arriving at an emergency facility. The command and control function, however, does not transfer from Control Room to TSC, from TSC to CEOF, from TSC to EOF, or from CEOF to EOF until certain criteria have been met. These criteria are:

1. Minimum staffing levels are met and sufficient personnel are available in the facility to determine classifications, to determine recommended protective actions, to notify state and local agencies and to maintain communications.
(In the case of the Control Room, personnel are on-site 24 hours a day.)
2. Personnel in the facility have been fully briefed as to the status of the event and the currently proposed plan of action.
3. A formal statement of turnover between Shift Engineer and Station Director, between Station Director and Manager of Emergency Operations/Corporate MEO or between Corporate MEO and MEO have been made.

4.4.2 Essential Activities of the Command and Control ERF

The essential activities that must be performed once command and control has been assumed by an ERF are as follows:

- o Determine Emergency Action Level classification.
- o Determine Protective Action Recommendations (PARs) for the public and inplant workers.
- o Notify state, local and federal agencies as appropriate.
- o Maintain communications with their source of information.

4.4.3 Control Room/Station Minimum Staffing

For Nuclear Power Plants with a single Control Room, the minimum shift manning requirements for emergencies are determined by the number of operating Units (see Table 4.4-1). Since requirements for normal plant operations are the same as those shown in Table 4.4-1, the minimum staff will be on-site at all times to respond to emergencies.

NOTE

 * Shift manning requirements for operating modes other than *
 * normal on-line operation are governed by plant Technical *
 * Specifications. *

CEOF Staffing

The full CEOF Organization described in Section 4.3.1 shall be present before the CEOF assumes Command and Control responsibilities. This staff parallels the EOF Minimum Staff capabilities.

EOF Minimum Staffing

The minimum staff for the Emergency Operations Facility is as follows:

- o Manager of Emergency Operations (EOF)
- o Technical Support Manager (EOF)
- o One other member of the Technical Group from Figure 4.3-2
- o Protective Measure Director (EOF)
- o Environmental Emergency Coordinator (EOF)
- o ODCS Specialist (EOF)
- o Advisory Support Manager (EOF)
- o Emergency Planner (EOF)

4.4.6 Nondelegable Responsibilities of Command and Control

Regardless of the facilities activated during any emergency, the Director or Manager in Command and Control of the Emergency Response at any given time, shall maintain the following nondelegable responsibilities:

- 1) Final decision to declare the emergency classification.
- 2) Final decision to notify and make PARs to offsite authorities .
- 3) Authorization of personnel exposure beyond 10CFR20 limits under emergency conditions.
- 4) Issuance of thyroid blocking agents to CECo emergency workers and onsite personnel.

4.7.3 Federal Radiological Preparedness Coordinating Committee (FRPCC)

The Federal Radiological Preparedness Coordinating Committee consists of the Federal Emergency Management Agency, which chairs the Committee, the Nuclear Regulatory Commission, the Environmental Protection Agency, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Department of Defense, the Department of Agriculture, the Department of Commerce, and where appropriate and on an ad hoc basis, other Federal departments and agencies. The FRPCC shall assist FEMA in providing policy direction for the program of Federal assistance to State and local governments in their radiological emergency planning and preparedness activities.

4.7.4 Department of Energy (D.O.E.) Chicago Operations Office

The Department of Energy has extensive radiological monitoring equipment and personnel resources that it can assemble and dispatch to the scene of a radiological incident.

Upon request, the Department of Energy (DOE) Chicago Operations Office will provide assistance to Commonwealth Edison following a radiological incident as outlined in the Federal Radiological Monitoring and Assessment Plan (FRMAP). The objective of the DOE Chicago Operations Office would be to rapidly dispatch a team of specialists to the incident site where the team would:

- 1) Make needed radiological assistance available to the general public, State and local governments, and Federal agencies;
- 2) Provide a framework through which Federal agencies will coordinate their emergency monitoring and assessment activities in support of State and local governments radiological monitoring and assessment activities; and
- 3) Assist State and local governments in preparing for radiological emergencies by describing Federal radiological assistance responsibilities and capabilities.
- 4) Establish a Federal Radiological Monitoring and Assessment Center, as necessary, from which it will manage its activities.

If assistance from DOE is necessary or desirable, the affected State(s) would notify the DOE Chicago Operations Office.

The primary mechanisms utilized for notifications and transmittal of information include the State of Illinois NARS Form, the NRC Event Notification Worksheet and the State Agency Update Checklist. The reporting requirements and the use of these forms will be described below:

NOTE:

The offsite notification requirements for NARS, NRC notifications and State Agency Update Checklists are the responsibility of the facility in Command and Control. The NRC ENS and HPN notification responsibilities shall remain with the Station until the EOF assumes Command and Control. Other activated facilities shall assist in the acquisition of information on these forms.

6.1.1.1 State of Illinois NARS Form

A NARS Form (Figure 6.1-1a) shall be utilized to transmit information to appropriate State and local agencies within fifteen minutes of event declaration. (See Section 5.0). All NARS messages shall be reported in the format of the current NARS Form. The format and content of the NARS Form must be mutually agreed to by the Directors of Illinois Emergency Services and Disaster Agency (IESDA) and Illinois Department of Nuclear Safety (IDNS) and the General Manager of Nuclear Services before its use. The NARS Form is a State of Illinois form included in the GSEP to aid the reader in understanding the reporting concept. The NARS Form, including instructions for its use on the reverse side, is included in this Section.

This form is not subject to onsite or offsite review.

6.1.1.2 NRC Event Notification Worksheet

An NRC Event Notification Worksheet should be utilized to transmit information to the NRC via the Emergency Notification System. This notification must take place immediately after notification of state and local authorities, and no longer than 1 hour after time of classification. A copy of the Event Notification Worksheet is not included in this plan, but should be available in all locations containing an Emergency Notification System phone.

This form is not subject to onsite or offsite review.

TABLE 6.1-1
PRIMARY EMERGENCY RESPONSE ACTIONS FOR UNUSUAL EVENT

- 1) ACTING STATION DIRECTOR/STATION DIRECTOR
- a. Prior to initial notifications:
- o Assess, respond and mitigate immediate emergency
 - o Evaluate the emergency conditions
 - o Classify the event (nondelegable responsibility of Command and Control)
 - o Evaluate impact to health and safety of the public
 - o Evaluate health and safety of CECo personnel
 - o Evaluate meteorological and environmental conditions
 - o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
 - o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
- b. Authorize initial notifications to the following: (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)
- o System Power Dispatcher
 - o Illinois ESDA
 - o Illinois DNS
 - o Wisconsin DEG (Zion only)
 - o Iowa DSD (Quad Cities only)
 - o Local and County agencies as appropriate
 - o NRC Operations Center
- c. After initial notifications:
- o Maintain communications with NRC Operations Center as requested.
 - o Ensure Station TSC and OSC are activated if deemed appropriate.
 - o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
 - o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
 - o Upgrade classification if conditions warrant.
 - o Terminate if conditions warrant.
 - o Provide periodic State Agency Updates.
- 2) SYSTEM POWER DISPATCHER
- a. Record NARS form information, as appropriate
- b. Immediately notify the Nuclear Duty Officer

TABLE 6.1-2
PRIMARY EMERGENCY RESPONSE ACTIONS FOR ALERT

1) ACTING STATION DIRECTOR/STATION DIRECTOR

a. Prior to initial notifications:

- o Assess, respond and mitigate immediate emergency
- o Evaluate the emergency conditions
- o Classify the event (nondelegable responsibility of Command and Control)
- o Evaluate impact to health and safety of the public
- o Evaluate health and safety of CECo personnel
- o Evaluate meteorological and environmental conditions
- o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
- o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)

b. Authorize initial notifications to the following: (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)

- o System Power Dispatcher
- o Illinois ESDA
- o Illinois DNS
- o Wisconsin DEG (Zion only)
- o Iowa DSD (Quad Cities only)
- o Local and County agencies as appropriate
- o NRC Operations Center

c. After initial notifications:

- o Maintain communications with NRC Operations Center as requested.
- o Ensure Station TSC and OSC are activated.
- o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
- o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
- o Upgrade classification if conditions warrant. Downgrade to Unusual Event if conditions warrant.
- o Enter Recovery or terminate as conditions warrant.
- o Provide periodic State Agency Updates.
- o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.

TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information
- b. Immediately notify the Nuclear Duty Officer
- c. If CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

- a. Call affected station - verify plant status and event classification

NOTE:

If a Significant Alert classification is declared, then the CEOF Organization shall be activated.

- b. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations) as required.
- c. If an EOF is to be activated, ensure access control is initiated.
- d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.
- b. Direct the overall Company response to the emergency event.

TABLE 6.1-3
PRIMARY EMERGENCY RESPONSE ACTIONS FOR SITE EMERGENCY

- 1) ACTING STATION DIRECTOR/STATION DIRECTOR
- a. Prior to initial notifications:
- o Assess, respond and mitigate immediate emergency
 - o Evaluate the emergency conditions
 - o Classify the event (nondelegable responsibility of Command and Control)
 - o Evaluate impact to health and safety of the public
 - o Evaluate health and safety of CECO personnel
 - o Evaluate meteorological and environmental conditions
 - o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
 - o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
 - o Initiate assembly and accountability.
- b. Authorize initial notifications to the following (Authorization of initial State notifications is a nondelegable responsibility of Command and Control)
- o System Power Dispatcher
 - o Illinois ESDA
 - o Illinois DNS
 - o Wisconsin DEG (Zion only)
 - o Iowa DSD (Quad Cities only)
 - o Local and County agencies as appropriate
 - o NRC Operations Center
- c. After initial notifications:
- o Maintain communications with NRC Operations Center as requested.
 - o Ensure Station TSC and OSC are activated.
 - o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
 - o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
 - o Upgrade classification if conditions warrant. Do not downgrade.
 - o Enter Recovery or Terminate as conditions warrant.
 - o Provide periodic State Agency Updates.
 - o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
 - o Dispatch environs monitoring teams
 - o Conduct evacuation of non-essential personnel

TABLE 6.1-3 (CONT)

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information
- b. Immediately notify the Nuclear Duty Officer
- c. When CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF)

3) NUCLEAR DUTY OFFICER

- a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations).
- b. Call affected station - verify plant status and event classification .
- c. Ensure EOF access control has been initiated.
- d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.
- b. Direct the overall Company response to the emergency event.

TABLE 6.3-4
PRIMARY EMERGENCY RESPONSE ACTIONS FOR GENERAL EMERGENCY

- 1) ACTING STATION DIRECTOR/STATION DIRECTOR
- a. Prior to initial notifications:
- o Assess, respond and mitigate immediate emergency
 - o Evaluate the emergency conditions
 - o Classify the event (nondelegable responsibility of Command and Control)
 - o Evaluate impact to health and safety of the public
 - o Evaluate health and safety of CECO personnel
 - o Evaluate meteorological and environmental conditions
 - o Determine dose equivalent estimates for actual or potential releases by reviewing A-Model results (when available).
 - o Authorize Recommended Protective Actions to be made consistent with Figure 6.3-1 and Table 6.3-1. (nondelegable responsibility of Command and Control)
 - o Initiate assembly and accountability.
- b. Authorize initial notifications to the following (nondelegable responsibility of Command and Control)
- o System Power Dispatcher
 - o Illinois ESDA
 - o Illinois DNS
 - o Wisconsin DEG (Zion only)
 - o Iowa DSD (Quad Cities only)
 - o Local and County agencies as appropriate
 - o NRC Operations Center
- c. After initial notifications:
- o Maintain communications with NRC Operations Center as requested.
 - o Ensure Station TSC and OSC are activated, if deemed appropriate.
 - o Authorize personnel exposure beyond 10CFR20 limits, as necessary (nondelegable responsibility of Command and Control)
 - o Call in additional Emergency Response Personnel as necessary to meet the needs of the emergency.
 - o Do not downgrade classification.
 - o Enter Recovery or Terminate as conditions warrant.
 - o Provide State Agency Updates.
 - o Ensure orderly transfer of Command and Control if the CEOF/EOF is prepared to assume these responsibilities.
 - o Dispatch environs monitoring teams
 - o Conduct evacuation of non-essential personnel

TABLE 6.1-4 (CONT)

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information
- b. Immediately notify the Nuclear Duty Officer
- c. When CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

- a. Initiate activation of the Corporate Emergency Response Organization (CEOF, EOF and/or ENC Organizations).
- b. Call affected station - verify plant status and event classification .
- c. Ensure EOF access control has been initiated.
- d. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of SITE EMERGENCY classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF and EOF)

- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, when the CEOF/EOF is activated.
- b. Direct the overall Company response to the emergency event.

TABLE 6.1-5

PRIMARY EMERGENCY RESPONSE ACTIONS FOR RECOVERY

- 1) STATION DIRECTOR/MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)
- a. Evaluate the guidance in Section 5.0 of this plan to determine if Recovery is appropriate.
 - b. Declare Recovery to be in effect (nondelegable responsibility of Command and Control)
 - c. Ensure notification of the following:
 - o System Power Dispatcher
 - o Illinois ESDA and DNS
 - o Iowa Disaster Services Division (for Quad Cities Station only)
 - o Wisconsin Division of Emergency Government (for Zion Station only)
 - o Contiguous local authorities as required
 - o NRC
 - o ANI
 - o INPO
 - d. Evaluate parameters, environmental conditions and other information to determine what long-term organization is required for Recovery.
 - e. Schedule personnel, material, and equipment necessary to support Recovery.
 - f. Provide mechanisms, if required, for periodic plant status and meteorological information to ESDA/DNS and contiguous state authorities.
 - g. Determine level of activation and/or manning of emergency response facilities if preplanned events are to occur that have a potential (possibility) of impacting upon the health and safety of the public, CECO personnel, plant equipment, and/or the environment.
 - h. With the concurrence and approval of the Senior Vice President, Nuclear Operations, modify the Station Emergency Response Organization (i.e., Control Room, OSC and TSC) and the Corporate Emergency Response Organization (i.e., CEOF, EOF, and Emergency News Center) as necessary to support recovery efforts.

7.1.4 Corporate EOF (CEOF)

The Corporate EOF (CEOF) is the location from which the Manager of Emergency Operations (CEO) will direct a staff in evaluating, coordinating, and directing the overall company activities involved with an emergency. Activation of the CEO is mandatory upon declaration of a Significant Alert, a Site Emergency or General Emergency.

When the EOF Organization is activated at the nearsite EOF, then the CEO Organization shall report to the EOF Organization in a supporting role. The CEO is located in the Downers Grove facility.

The CEO is also the official backup EOF for Zion Station. The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- o Technical Support personnel
- o Advisory Support personnel
- o Environmental Assessment personnel
- o Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

7.1.5 Emergency Operations Facility (EOF) (cont'd)

The four (4) primary EOFs (Mazon EOF to serve Dresden, Braidwood and LaSalle County Stations, Dixon EOF for Byron Station, Morrison EOF for Quad Cities Station, and Zion EOF for Zion Station) are constructed according to the design criteria such that:

- 1) The location provides optimum functional and availability characteristics for carrying out overall strategic direction of CECo onsite and support operations, determination of public protective actions to be recommended to offsite officials, and coordination with Federal, State and local organizations.
- 2) They are well engineered for the design life of the plant and are of sufficient size to accommodate about 50 people. The Zion Station EOF, because of its close proximity to the station, is provided with additional radiological protection features. It also has a backup facility located in Downers Grove should the EOF become uninhabitable.
- 3) They are equipped with reliable voice communications capabilities to the TSC, the OSC, the CEOF, the Control Room, NRC, and State and local emergency operations centers. In addition, each EOF has facsimile transmission capability.
- 4) Equipment is provided to gather, store, and display data needed in the EOF to analyze and exchange information on plant conditions with the Station Director in the TSC.
- 5) The EOF technical data system receives, stores, processes, and displays information sufficient to perform assessments of the actual and potential onsite and offsite environmental consequences of an emergency condition.
- 6) They have ready access to plant records, procedures, and emergency plans needed for effective overall management of CECo emergency response resources.

7.1.6 JOINT PUBLIC INFORMATION CENTER (JPIC)

The Joint Public Information Center (JPIC) is the facility in which media personnel gather to receive information related to the emergency event. The JPIC may or may not be in the same physical location as the EOF.

Emergency News personnel operate from the Joint Public Information Center (JPIC), which is under the direction of the Public Information Manager and functions as the single point contact to interface with Federal, State, and local authorities who are responsible for disseminating information to the public. The Public Information Manager and appropriate technical spokespersons shall be available to brief the press at the JPIC.



Commonwealth Edison
1400 Opus Place
Downers Grove, Illinois 60515

August 5, 1993

Mr. John B. Hickman
Project Manager
Project Directorate III-2
Division of Reactor Projects - III/IV/V
Office of Nuclear Reactor Regulations
U.S. NRC
Washington, D.C. 20555

Subject: Response to Request for Additional Information
Related to the Proposed Generating Station Emergency
Plan (GSEP) Revision Incorporating the Corporate EOF
as an Interim EOF, GSEP Change Request Number 93-01

- Reference: 1) Letter from D. Saccomando (CECo) to Mr. A. Bert Davis
(NRC), dated March 31, 1993; Re: "Submittal of Change
Request Number 93-01 to the Commonwealth Edison
Generic Generating Station Emergency Plan (GSEP) for
NRC Review and Approval."
- 2) Letter from John B. Hickman (NRR) to Mr. D. L.
Farrar, dated May 19, 1993; Re: "Request for
Additional Information Related to the Proposed GSEP
Revision Incorporating the Corporate EOF as an
Interim EOF."
- 3) NRC Inspection Report; dated August 20, 1992 (Nos.
50-237 and 249/92022, 50-254 and 265/92019, et.
al..)

Dear Mr. Hickman:

With regards to Commonwealth Edison Company's (CECo's) March 31, 1993, submittal (Reference 1) proposing a revision to its Generating Station Emergency Plan (GSEP), the NRC requested that CECo provide additional information (Reference 2) to determine whether the company's revision, "resolve(s) the NRC concerns with the staffing of the CECo near-site EOFs." The additional information requested by your office is provided as an Enclosure to this letter. This information was discussed in a July 21, 1993, conference call between CECo, NRR and NRC Region III personnel.

CECo initially proposed the use of the Corporate Emergency Operations Facilities (CEOF) as an interim EOF in response to concerns identified during an NRC Region III inspection (Reference 3). CECo met with NRC Region III on September 17, 1992 and NRR on December 1, 1992 to discuss CECo's offsite emergency response strategy and the proposed use of CEOF as an interim EOF.

CECo's proposed revision involves activation of it's CEOF, in Downers Grove, as an interim EOF for all of the company's nuclear facilities while the near-site EOF is activated. The interim use of the CEOF during the initial stages of an emergency represents an increase in our commitment to Emergency Preparedness, public health and safety. The use of the CEOF does not diminish the importance of the near-site EOF. The administrative changes made to enhance the CEOF activation time to meet the one hour "goal", have served to reduce the near-site EOF staffing times.

CECo's emergency response strategy has been designed to best use its extensive personnel and resources. This approach involves using personnel from the corporate office and unaffected stations to staff the near-site EOF, and affected station personnel to respond to their own onsite emergency response facilities. In CECo's view, this strategy optimizes the use of CECo's senior management resources to make key onsite and offsite emergency response decisions, while allowing the affected station to focus on onsite response.

The CEOF will be staffed consistent with the one hour "goal" given in NUREG-0654 (and NUREG-0737, Supp. 1). The near-site EOF will assume emergency management responsibility as soon as possible once the near-site EOF is activated. It is CECo's position that the staffing of the CEOF within the one hour "goal", and simultaneous staffing of the near-site EOF at the Site and General Emergency, meet NRC response criteria in NUREG-0654 (and NUREG-0737, Supp.1).

We would like to stress that the proposed change to the GSEP does not reduce the importance of a near-site EOF. Rather, the proposed change has increased and realigned the minimum staff at the near-site EOF so that it will be even better able to effectively execute expected functions. As a result of this plan change, the minimum staff at the EOF has been increased from six to eight individuals through expansion in the Protective Measures and Technical areas. By using the CEOF, additional support will be

provided to the TSC with the addition of the eight person CEOF staff. The CEOF, as the licensed Backup EOF for Zion Station, has the comparable physical capabilities of a near-site EOF.

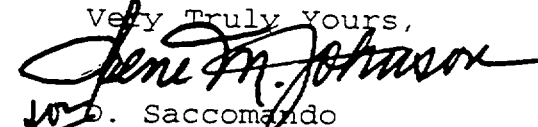
Additionally, since the CEOF will be activated at a lower threshold than the near-site EOF (Alert verses Site Emergency), it should be in place to provide support to the TSC if the event were to escalate to a Site or General Emergency. If the initiating event is a Site or General Emergency, the near-site EOF will be simultaneously activated with the CEOF.

The use of an interim offsite emergency response facility is not new to CECO. Previous GSEP revisions have included the use of the CEOF (or the Corporate Command Center (CCC) prior to GSEP Revision 7) as an interim facility. The proposed use of the CEOF is an enhancement over the previous CEOF/CCC concept in that activation is mandated at an Alert classification and required during any hour. The NRC has previously evaluated the use of the CEOF/CCC during exercises, and has not identified any major functional discrepancies.

CECo's interim EOF proposal is distinguishable from previous non-CECo EOF approaches which the Commission has considered as our approach still maintains the traditional near-site EOF.

Please direct any questions you or your staff may have regarding this matter to Ms. Irene Johnson at (708)663-2095 or Ms. Leslie Holden at (708)663-6673.

Very Truly Yours,


Irene M. Johnson
for D. Saccomando
Nuclear Licensing

DS/LH/ktd

Enclosure

cc: R. Emch - NRR
R. Pedersen - NRR
J. McCormick-Barger - NRC Region III
NRC Resident Inspector - Dresden, w/o enclosure
NRC Resident Inspector - Braidwood, w/o enclosure
NRC Resident Inspector - Byron, w/o enclosure
NRC Resident Inspector - Zion, w/o enclosure
NRC Resident Inspector - LaSalle, w/o enclosure
NRC Resident Inspector - Quad Cities, w/o enclosure
NRC Document Control Desk

USNRC Request for Additional Information
Related to the Proposed GSEP Revision
Incorporating the Corporate EOF as an Interim EOF
(May 19, 1993)

Question 1: Goal for Staffing Near-site EOF

Attachment A to the March 31, 1993, CECO letter, which transmitted Revision 93-01 to the GSEP, states, "Our approach involves staffing a corporate EOF within the one hour "goal" while a near-site EOF is being staffed." In revision 93-01 to the GSEP, the "goal" for staffing a near-site EOF is not stated.

State the "goal" for staffing the near-site EOF for each of CECO's nuclear plant sites.

Response:

GSEP Revision 93-01 proposed the use of the CEOF to meet the one hour "goal" delineated in NUREG-0737. We believe with reasonable certainty that the CEOF can be staffed within the one hour "goal" and perform the necessary functions of an EOF until a near-site EOF is activated. Furthermore it is our belief that the near-site EOF staffing times remain commensurate with the offsite agency response. As such, no additional burden is placed on the TSC during the time that a near-site EOF is being staffed.

CECO continues its efforts to enhance staff augmentation methods with the intent of reducing near-site EOFs staffing times. Until additional enhancements have been implemented and collectively evaluated, definitive EOF response times are not meaningful. Based on the time study analysis discussed in response to Question 2, CECO proposes an interim "goal" for Minimum Staff at a near-site EOF of 1-1/2 to 3 hours, based on normal travel considerations for offhours activation. After further enhancements have been made, this time will be reevaluated.

Question 2: Results of Staffing Augmentation Analysis

Attachment A to the March 31, 1993, CECO letter indicates that efforts are being made to reduce the time for staffing the near-site EOFs, which include modeling of response times. Provide supporting documentation (time studies and results of actual augmentation drills) which demonstrates that CECO's "goal" for staffing near-site EOFs and the CEOF for each nuclear plant site is reasonably attainable in an actual event. In addition, provide a "to scale" map or diagram which indicates the location of each of CECO's nuclear plants, EOFs and the CEOF.

Response:

Time studies, based on survey response times, indicate EOF minimum staffing times to be from about 1-1/2 hours to 3 hours. These time studies serve as the basis for the EOF Minimum Staffing interim "Goal" discussed in the response to Question 1.

The results of these time studies indicate the following Minimum Staffing times for the near-site EOFs:

TIME STUDY RESULTS

	<u>Minimum Staff (hours)*</u>
Dixon	2-1/2 to 3
Mazon	1-1/2 to 2
Morrison	2-1/2 to 3
Zion	2 to 3

*(To the nearest half hour.)

Since the augmentation process has been under revision, the drill response times obtained to date may not accurately reflect current staffing times. Until enhancements are completed and times are substantiated through the conduct of after hour augmentation drills, definitive response times are difficult to ascertain.

Included, for your information, is a to-scale map which indicates the location of CECO's near-site EOFs, the CEOF and the nuclear stations.

Question 3: CEOF Staffing Goal

Attachment A to the March 31, 1993 letter states, "the CEOF can be expected to be staffed off hours within the one hour "goal" (55 to 75 minutes) after callout initiation." It is not clear how the time of "callout initiation" relates to the time the event is declared. The "goal" for staff augmentation as provided in Supplement 1 to NUREG-0737 is based upon the time the event is declared.

Provide justification for having a staffing "goal" for the CEOF based upon the time of "callout initiation" instead of the time an event is declared. Provide the relationship between the time of "callout initiation" and the time that an event is declared.

Response:

To be consistent with the timing given in NUREG-0737, Supplement 1, Commonwealth Edison will adjust the CEOF augmentation staffing "goal" to include the time from when the event is declared.

The 55 to 75 minute staffing time given in Reference 1 was based on the time that the Nuclear Duty Officer (NDO) initiates activation. The Commonwealth Edison notification procedure leading to the NDO initiating activation consists of:

- 1) Transmission of the Nuclear Accident Reporting System (NARS) form to the state/locals and to a Commonwealth Edison Load Dispatcher. The NARS form issued by the station contains the time of event classification.
- 2) The Load Dispatcher notifies the Nuclear Duty Officer and records the time of notification on his copy of the NARS form.

In order to determine the time between declaration and NDO notification, Commonwealth Edison reviewed the Load Dispatcher's copy of 20 actual emergency classifications at the six nuclear sites during a two year period. The results of this review indicated the average time required to notify the Nuclear Duty Officer was 16 minutes from the time of event classification. This time will be absorbed into our one hour "goal".

Question 4: Minimum Staffing

GSEP Section 4.4, "Command and Control Criteria/Essential Activities/ERF Minimum Staffing/Nondelegable Responsibilities," states that the emergency response facility which is in command and control must perform the following essential activities:

- Determine Emergency Action Level Classification;
- Determine Protective Action Recommendations (PARs);
- Notify State, local, and Federal agencies as appropriate; and
- Maintain communications with their source of information.

The GSEP also specifies the minimum staffing level required for each of the emergency response facilities. It is not clear how the "minimum" staff will be able to perform all of the required functions. For example, the minimum staff for the EOF includes the Manager of Emergency Operations, Protective Measures Director, Technical Support Manager, Advisory Support Manager, Environs Director, or one other Director or Communicator.

Provide additional information which demonstrates that the minimum staff will be able to perform the required functions for each of the emergency response facilities, including the CEOF. In particular, provide information regarding how the CEOF will communicate with Federal agencies, including the NRC.

Response:

In support of the proposed GSEP revision, a review of the functions delineated in NUREG-0737 was performed. Several Managers of Emergency Operations (MEO) who had participated in previous exercises utilizing the CEOF were interviewed to determine what additional personnel may be required to perform the functions of an EOF. As a result, a proposed CEOF staff was developed which is an expanded and enhanced version of that which was communicated to you at our December 1, 1992, meeting.

GSEP Revision 93-01 proposed the following CEOF staff:

- 1) Manager of Emergency Operations,
- 2) Technical Support Manager,
- 3) Technical Specialist,
- 4) Advisory Support Manager,
- 5) Emergency Planner,
- 6) Protective Measures Director, and
- 7) and 8) Health Physics and Environmental Specialists [Two(2)].

CECo also has proposed parallel changes for the EOF Minimum Staff. The proposed Minimum Staff for the EOF is as follows:

- 1) Manager of Emergency Operations,
- 2) Technical Support Manager,
- 3) One other member of the Technical Group,
- 4) Advisory Support Manager,
- 5) Emergency Planner,
- 6) Protective Measures Director,
- 7) Environmental Emergency Coordinator, and
- 8) ODCS Specialist.

Attachments A and B indicate which positions in the CEOF and the EOF are responsible for the functions identified in GSEP Section 4.4.1. Attachments C and D address communication responsibilities for the previously identified GSEP positions with offsite agencies. The Attachments also reference the appropriate Corporate Emergency Plan Implementing Procedures (CEPIPs) where specific direction is provided regarding these functions.

With regard to the CEOF maintaining communication with the NRC, it is CECO's intent to have the Technical Support Center (TSC) remain as the primary communication point with the NRC until the EOF assumes responsibility for emergency management. The MEO (CEO) has the responsibility to ensure that the TSC is maintaining adequate communication with the NRC. During the initial phases of an event, the TSC will be able to provide a more accurate and timely response to plant conditions than would either the CEOF or the EOF. Additional information is provided via the Emergency Response Data System (ERDS) which provides real time plant data to the NRC for independent assessment.

Communication via the Emergency Notification System (ENS) and Health Physics Network (HPN) will be maintained by dedicated communicators in the TSC, until their EOF counterpart communicators arrive. Even then, the TSC ENS and HPN communicators remain on the line.

It is expected that the response time of the NRC and other agencies to an EOF would be commensurate with the CECO EOF response time, and as such we would not expect the NRC to communicate with the CEOF. However if need arose for communication between the NRC and the CEOF, it would be accomplished via commercial phone lines.

NRC (Region III) observed the CEOF during the LaSalle Exercise on March 31, 1993, and the Braidwood Exercise on June 23, 1993. Overall performance was characterized as excellent in the LaSalle Inspection Report (IR 50-373 & 374/93012), and as very good in the Braidwood Inspection Report (IR 50-456 & 457/93015). In the past, Commonwealth Edison has utilized the Corporate Command Center (CCC) as an interim EOF, similar in function to the CEOF. NRC observation of the performance in the CCC had not indicated any concerns over the ability of the CCC staff, which is smaller than the current proposed CEOF staff, to perform necessary functions.

Question 5: Coordination with State and Local Governments

The EOF is the interface for coordination of emergency response activities with the State and local governments during an emergency. The response to an emergency by the state and local authorities could be affected by the time needed to staff the EOF and the use of the CEOF as an interim EOF. The staff requests information regarding the position of the State or local governments concerning the CECO proposal.

Provide documentation regarding coordination with the affected State and local governments on the time "goal" for the staffing of the CECO near-site EOFs and the use of the CEOF as an interim EOF until the near-site EOFs are staffed.

Response:

Interface for coordination of emergency response activities with State and local governments during an emergency is initiated with the first phone call from the control room. Interface with State and local authorities for purposes of decision making transfers with responsibility for emergency management as it passes to the TSC, CEOF or EOF.

In all cases, State decisionmakers operate out of Emergency Operations Centers (EOCs) located in their respective state capitals. Local decisionmakers operate out of county EOCs. No State or local decisionmakers come to the EOF.

State personnel, who eventually arrive at the EOF, act as liaisons. As liaisons, they monitor information being provided through official channels to ensure information is being provided accurately and timely. Liaisons have no authority to make decisions for the agency they represent.

In the unique case of Illinois, plant data are transmitted twenty four hours a day via computer to Springfield. The Illinois Department of Nuclear Safety (IDNS) not only gathers information from the data link but also from a real time Gaseous Effluent Monitoring System and a system of Reuter-Stokes radiation monitors (which are located in a ring near the site) on a continuous basis. As a result of the Memorandum of Understanding (MOU) between IDNS and NRC, the IDNS resident engineers report to the TSC as their emergency response location. These resident engineers remain at the TSC even after the EOF is manned. The resident engineers act as liaisons to the TSC and monitor information flow for the Illinois Department of Nuclear Safety.

Wisconsin and Iowa are provided information via telephone communications. In addition, a dedicated Decisionmakers Conference Line has been provided at Zion and Quad Cities. The Decisionmakers Conference Line connects the Station Director in the TSC or the Manager of Emergency Operations in the CEOF or EOF with the Radiological Emergency Assessment Center (REAC) Commander (IDNS), and the State Radiological Coordinator (Iowa, or Wisconsin, as appropriate). This dedicated link allows for rapid consultation on protective action decisions.

None of the counties in Illinois, Iowa or Wisconsin dispatches representation to CECO's EOFs. Counties in Illinois receive initial notification from the Illinois Emergency Management Agency (IEMA). Scott and Clinton counties in Iowa are notified at the Unusual Event (UE) and Alert level by the Iowa Emergency Management Division (IEMD) and at the Site Area Emergency (SAE) and General Emergency (GE) level by CECO. Kenosha County, Wisconsin is notified by CECO at all classification levels.

Supporting information to the counties is provided by the states either by phone or by state liaisons in the county EOC. CECO also dispatches a representative to the county EOCs. CECO representatives are called out with the EOF staff and have arrival times commensurate with that to an EOF and with state representatives for a given county.

In the event that a General Emergency were the initiating event, CECO recommends protective actions directly to States and Counties simultaneously. In this event, counties would most likely take protective actions before any facility (i.e. a TSC, EOF, or State EOC) were manned.

Question 6: Significant Alert Classification

CECO has introduced a new Emergency class called the Significant Alert, which is defined as "those Alert Emergency Action Levels (EALs) which indicate a radiological release or directly affect safety system equipment and are designated in each station's GSEP Annex Section 5."

The staff is concerned whether the complexity added to the emergency response due to the introduction of another emergency class, i.e., the Significant Alert, with the sole purpose of activating the CEOF at a lower class than the Site Emergency, is warranted. It is not clear whether State and local officials will be notified of a "Significant Alert" or "Alert" when the event meets the criteria for a "Significant Alert."

Provide additional justification for incorporating the "Significant Alert" classification which addresses these staff concerns.

Response:

The "Significant Alert" is not a new emergency classification, but rather a trigger for events which warrant activation of the CEOF. Our review of events indicates only a small number of additional CEOF activations would result if the CEOF were activated at all events classified as Alerts. Therefore CECO will delete the "Significant Alert" concept from the GSEP and will activate the CEOF for all events classified as Alert (or higher). This change will require CECO to revise several pages to the proposed GSEP change. This will be done by October 15, 1993. A draft of these proposed changes is provided in Attachment E for your information.

Attachment ACORPORATE EMERGENCY OPERATIONS FACILITY (CEOF)EMERGENCY ACTION LEVELS (EALS)

<u>Function</u>	<u>GSEP Position</u>	<u>Procedure</u>
FINAL DECISION	Manager of Emergency Operations	CEPIP 2200-01
ADVISE/RECOMMEND		
Plant	Technical Support Manager	CEPIP 2210-01
Radiological	Protective Measures Director	CEPIP 2220-01
MONITOR CONDITIONS		
Plant	Technical Specialist	CEPIP 2211-01
Radiological	Health Physics/Environmental Specialists	CEPIP 2221-01

PROTECTIVE ACTION RECOMMENDATIONS (PARS)

FINAL DECISION	Manager of Emergency Operations	CEPIP 2200-01
ADVISE/RECOMMEND	Protective Measures Director	CEPIP 2220-01
MONITOR CONDITIONS	Health Physics/Environmental Specialists	CEPIP 2221-01

NOTIFICATION/COMMUNICATION

STATE	Manager of Emergency Operations	CEPIP 2200-01
	Advisory Support Manager (Via the Nuclear Accident Reporting System (NARS))	CEPIP 2230-01
	Health Physics/Environmental Specialists	CEPIP 2221-01
LOCAL	Illinois Emergency Management Agency (IEMA) - Not CECO - notifies local agencies. (For Iowa and Wisconsin, counties are notified via the NARS.)	
NRC	Manager of Emergency Operations (Ensures TSC makes notifications.)	CEPIP 2300-01

Attachment BEMERGENCY OPERATIONS FACILITY (EOF)EMERGENCY ACTION LEVELS (EALS)

<u>Function</u>	<u>GSEP Position</u>	<u>Procedure</u>
FINAL DECISION	Manager of Emergency Operations	CEPIP 2300-01
ADVISE/RECOMMEND		
General	Assistant Manager of Emergency Operations	CEPIP 2300-02
Plant	Technical Support Manager	CEPIP 2310-01
Radiological	Protective Measures Director	CEPIP 2320-01
MONITOR CONDITIONS		
Plant	Technical Support Director	CEPIP 2310-02
Radiological	Environmental Emergency Coordinator	CEPIP 2322-01

PROTECTIVE ACTION RECOMMENDATIONS (PARS)

FINAL DECISION	Manager of Emergency Operations	CEPIP 2300-01
ADVISE/RECOMMEND		
	Assistant Manager of Emergency Operations	CEPIP 2300-02
	Protective Measures Director	CEPIP 2320-01
MONITOR CONDITIONS		
	Environmental Emergency Coordinator	CEPIP 2322-01
	ODCS Specialist	CEPIP 2322-01

NOTIFICATION/COMMUNICATION

STATE	Manager of Emergency Operations	CEPIP 2300-01
	Assistant Manager of Emergency Operations (Via the Nuclear Accident Reporting System (NARS))	CEPIP 2300-02
	Advisory Support Manager	CEPIP 2330-01
	Governmental Communicator	CEPIP 2332-02
	State Environs Coordinator	CEPIP 2322-03
LOCAL	Illinois Emergency Management Agency (IEMA) notifies local agencies. (For Iowa and Wisconsin, counties are notified via the NARS.)	
NRC	ENS Communicator	CEPIP 2315-03
	HPN Communicator	CEPIP 2321-02

ENCLOSURE

Attachment C

CORPORATE EMERGENCY OPERATIONS FACILITY (CEOF)
COUNTERPART SOURCES FOR INFORMATION

	<u>Procedure</u>
Manager of Emergency Operations (CEOF) to: - Station Director	CEPIP 2200-01
Technical Support Manager (CEOF) to: - Technical Director (TSC)	CEPIP 2210-01
Technical Specialist (CEOF) to: - Technical Communicator (TSC)	CEPIP 2211-01
Protective Measures Director (CEOF) to: - Radiation Protection Director (TSC)	CEPIP 2220-01
Health Physics/Environmental Specialist (CEOF) to: - Environs Director (TSC) - ODCS Specialist (TSC) - Illinois Department of Nuclear Safety (IDNS) - Wisconsin Department of Emergency Government (WDEG)-State EOC (Zion only) - Iowa Emergency Management Division (IEMD) (Quad Cities only)	CEPIP 2221-01
Advisory Support Manager (EOF) to: - Assistant Station Director (TSC)	CEPIP 2230-01

ENCLOSURE

Attachment D

EMERGENCY OPERATIONS FACILITY (EOF)
COUNTERPART SOURCES FOR INFORMATION

Procedure

Manager of Emergency Operations (EOF) to: <ul style="list-style-type: none">- Station Director- Manager of Emergency Operations (CEOF)	CEPIP 2300-01
Technical Support Manager (EOF) to: <ul style="list-style-type: none">- Technical Support Manager (CEOF)	CEPIP 2310-01
Technical Support Director (EOF) to: <ul style="list-style-type: none">- Technical Director (TSC)	CEPIP 2310-02
Station SRO to: <ul style="list-style-type: none">- Operations Director (TSC)	CEPIP 2312-01
Technical Communicator (EOF) to: <ul style="list-style-type: none">- Technical Communicator (TSC)- Technical Specialist (CEOF)	CEPIP 2315-02
ENS Communicator (EOF) to: <ul style="list-style-type: none">- ENS Communicator (TSC)- NRC (ENS)	CEPIP 2315-03
SPDS/PTHSTY Specialist (EOF) to: <ul style="list-style-type: none">- Technical Specialist (CEOF)	CEPIP 2315-04
Protective Measures Director (EOF) to: <ul style="list-style-type: none">- Protective Measures Director (CEOF)	CEPIP 2320-01
Health Physics Director (EOF) to: <ul style="list-style-type: none">- Radiation Protection Director (TSC)	CEPIP 2321-01
HPN Communicator (EOF) to: <ul style="list-style-type: none">- HPN Communicator (TSC)- NRC (HPN)	CEPIP 2321-02
Protective Measures Communicator (EOF) to: <ul style="list-style-type: none">- Environs Staff (TSC)	CEPIP 2322-02

ENCLOSURE

Attachment D (continued)

EMERGENCY OPERATIONS FACILITY (EOF)
COUNTERPART SOURCES FOR INFORMATION

<u>Function</u>	<u>GSEP Position</u>	<u>Procedure</u>
State Environs Coordinator (EOF) to:		CEPIP 2322-03
- Illinois Department of Nuclear Safety (IDNS)		
- Wisconsin Department of Emergency Government (WDEG)-State EOC (Zion only)		
- Iowa Emergency Management Division (IEMD) (Quad Cities only)		
ODCS Specialist (EOF) to:		CEPIP 2322-04
- ODCS Specialist (TSC)		
- Health Physics/Environmental Specialist (CEOF)		
- Murray and Trettel (Weather forecast)		
Environs Director (EOF) to:		CEPIP 2322-05
- Environs Director (TSC)		
GSEP Radio Communicator (EOF) to:		CEPIP 2322-05A
- Field Team Communicator (TSC)		
Advisory Support Manager (EOF) to:		CEPIP 2330-01
- Advisory Support Manager (CEOF)		
Manpower and Logistics Director (EOF) to:		CEPIP 2331-01
- Administrative Director (TSC)		
Emergency Planner (EOF) to:		CEPIP 2333-01
- Emergency Planner (CEOF)		
- EP Advisor (TSC) (if applicable)		
Safeguards Specialist (EOF) to:		CEPIP 2334-01
- Security Director (TSC)		

ATTACHMENT E

REVISIONS TO PROPOSED GSEP CHANGE 93-01
(For information only)

FOR INFORMATION ONLY

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SECTION 2 (continued)

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2.33 PROTECTIVE ACTIONS

Those emergency measures taken for the purpose of preventing or minimizing radiological exposures to affected population groups.

2.34 QUARTERLY

Frequency of occurrence equal to once in each of the following four periods: January 1 thru March 31; April 1 thru June 30; July 1 thru September 30; October 1 thru December 31.

2.35 SEMI-ANNUAL

Frequency of occurrence equal to once in each of the following periods: January 1 thru June 30; July 1 thru December 31.

2.36 SHALL, SHOULD, AND MAY

The word "shall" is used to denote a requirement, the word "should" to denote a recommendation, and the word "may" to denote permission, neither a requirement nor a recommendation.

2.37 INTENTIONALLY BLANK

2.38 SITE BOUNDARY

The Site Boundary is that Company owned property on which a Nuclear Station is located and may include Commonwealth Edison leased lands adjacent to that Nuclear Station. Each Nuclear Station's Site Boundary is described in detail in its site specific annex to the GSEP.

2.39 STANDBY

An Emergency Response Facility is considered to be on Standby if Minimum Staffing, as described in Section 4, has been assessed as present and the facility has been assessed as being capable of assuming the nondelegable responsibilities of Command and Control, as they apply to the facility in question.

3.1.2 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of:

- * The CEOF Organization
- * The EOF Organization
- * The Emergency News Center Organization

These Corporate Organizations will be covered in detail in Section 4.0 of this plan.

The Corporate Emergency Response Organization is staffed by Corporate, Nuclear Station and Commercial Division personnel, and operates out of the Corporate Emergency Operations Facility (CEOF) and Emergency Operations Facility (EOF) and the Joint Public Information Center (JPIC). This Corporate organization is supported by News Media Spokespersons, environmental assessment staff and monitoring teams that provide long-term support to the affected station. Additionally, this Corporate organization has long term liaison responsibilities with Federal, State, and local authorities.

The CEOF will be activated at an Alert. The CEOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC).

The CEOF also serves as the backup EOF for Zion Station as described in Section 3.4.

During the more serious emergencies (i.e., Site Emergency or General Emergency), the EOF Organization is responsible for evaluating, coordinating and directing the overall company activities involved in the emergency response. The CEOF may assume command and control from the Technical Support Center (TSC) until the station's EOF is capable of assuming command and control. This will be done at the discretion of the Manager of Emergency Operations. The CEOF may also function in a supporting role to the TSC, when the TSC maintains Command and Control. Once the EOF Organization is activated, the CEOF Organization becomes support staff to the EOF. (See Section 4.0).

3.4.4 Corporate EOF (CEOF) and the Zion Backup EOF (BEOF)

The Corporate EOF (CEOF), is the location where the Manager of Emergency Operations (CEO) will direct a staff in evaluating and coordinating the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of an Alert, Site Emergency or General Emergency. When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF has also been designated as a backup EOF for Zion Station if evacuation of personnel from the Zion EOF is required. Relocation is determined by the Manager of Emergency Operations at the Zion EOF, who assigns essential personnel to the CEOF Downers Grove facility and designates a staging area for remaining personnel.

3.4.5 Emergency Operations Facility (EOF)

The Emergency Operations Facility (EOF) located near the station, is the location at which management of overall emergency response, coordination of radiological assessments, and management of recovery operations occurs. The EOF Organization functions under a Manager of Emergency Operations at the EOF. The EOF shall be activated for all Site and General Emergency situations. Activation of any EOF for other emergency situations is optional per the directions of the Station Director, Nuclear Duty Officer, Manager of Emergency Operations (CEO) or Manager of Emergency Operations (EOF).

All EOFs are designed to function in a similar manner regarding voice communication and data transmission. Thus each EOF may be used as a backup for an inoperative EOF, with the previously stated exception of Zion, which shall use the CEOF at Downers Grove.

4.3 Corporate Emergency Response Organization

The Corporate Emergency Response Organization consists of three organizations; the CEOF, the EOF, and the Emergency News Center (ENC) Organization. Corporate Emergency Response Activation may involve all three corporate organizations, however, only the CEOF or EOF Organization can take Command and Control. These organizations will be covered in the following sections:

SECTION 4.3.1 CEOF Organization

SECTION 4.3.2 EOF Organization

SECTION 4.3.3 Emergency News Center Organization

The Corporate Emergency Response Organization is manned by CECO's Generating Station, General Office and Division Personnel. These personnel perform response actions in support of the Station Emergency Response Organization. Additionally, if activated, the Corporate Emergency Response Organization is capable of assuming overall Command and Control of the Emergency Response.

The size of the Corporate Emergency Response Organization and the need for its activation will depend upon the nature and extent of the emergency. Activation of the CEOF is required for Alerts, Site and General Emergencies. CEOF activation for Unusual Events will be determined by the level of response deemed appropriate by the Nuclear Duty Officer. Activation of the EOF is required for Site and General Emergencies. Activation for other events (i.e., Unusual Events or Alerts) will be determined by the level of response deemed appropriate by the Nuclear Duty Officer and/or Manager of Emergency Operations (CEOF).

NOTE:

The roles of the System Power Supply Office and the Nuclear Duty Officer are unique in that they may be considered as parts of the overall Corporate Emergency Response, but do not hold specifically identified positions within the CEOF Organization, the EOF Organization, or the ENC Organization. For a description of their general responsibilities as they pertain to the GSEP, refer to the following referenced Tables:

Table 4.3-1 System Power Supply Office

Table 4.3-2 Nuclear Duty Officer

NOTE:

The Emergency Restoration of Power (ERP) Director is a position that coordinates with the Corporate Emergency Response Organization. The ERP Director works with the Nuclear Duty Officer when the CEOF is activated and the Manpower/Logistics Director (EOF) when the EOF is activated. This organizational relationship is depicted on the Organization charts by a dotted line. For a description of the general responsibilities of the ERP Director as they pertain to the GSEP, refer to the following referenced Table:

Table 4.3-11 ERP Director

FOR INFORMATION ONLY

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4.3.1 THE CEOF ORGANIZATION

When activation of the CEOF Organization is required, the goal for staffing is 60 minutes. Although the CEOF Organization is capable of assuming command and control, there are several factors differentiating the CEOF and EOF Organizations:

- 1) The CEOF Organization functions from the CEOF which is a single facility outside all the stations' 10 mile EPZs, while the EOF Organization functions from a given station's EOF.
- 2) The CEOF Organization is composed of a smaller number of response personnel than the EOF Organization.
- 3) The CEOF would likely be the CECO facility utilized during daytime hours for Corporate Response to Transportation Accidents. (This does not exclude the possibility of the Station Emergency Response Organization being activated for Transportation Accidents).
- 4) The CEOF Organization shall be activated when an Alert, a Site Emergency or a General Emergency is declared.
- 5) The CEOF may assume the nondelegable responsibilities of Command and Control of the Emergency Response from the Station Emergency Response Organization for Site and General Emergencies until the EOF is capable of assuming Command and Control Responsibilities. Determination of the transfer of Command and Control will be based on events in progress and will be determined by the MEO (CEO) and Station Director.
- 6) When both the CEOF and EOF Organizations are activated, the CEOF Organization will function in a support role to the larger EOF Organization, after Command and Control is transferred to the EOF.
- 7) The CEOF should not assume ENS/HPN communications responsibilities

The CEOF Organization consists of the following personnel whose major duties are delineated in the referenced Tables:

Table 4.3-3	MANAGER OF EMERGENCY OPERATIONS (CEO)
Table 4.3-4	TECHNICAL SUPPORT MANAGER (CEO)
Table 4.3-5	TECHNICAL SPECIALIST (CEO)
Table 4.3-6	PROTECTIVE MEASURES DIRECTOR (CEO)
Table 4.3-7	HEALTH PHYSICS/ENVIRONMENTAL SPECIALIST (CEO)
Table 4.3-8	ADVISORY SUPPORT MANAGER (CEO)
Table 4.3-9	EMERGENCY PLANNER (CEO)
Table 4.3-10	INTENTIONALLY BLANK

TABLE 4.3-2

NUCLEAR DUTY OFFICER (NDO)

The Nuclear Duty Officer (NDO) is the CECO individual who acts as the initial Corporate contact for emergency plan activations. The Nuclear Duty Officer (NDO) shall make decisions regarding activation of the Corporate Emergency Response Organization. The Nuclear Duty Officer's responsibilities include:

1) ACTIONS FOR ALL CLASSIFIED EVENTS

- a. Contact the affected station to verify and obtain updated information concerning emergency response actions and event status.
- b. Verify that all appropriate notifications have been made.
- c. Notify System Power Dispatcher of what other information, in addition to classification changes, the NDO wishes to receive.
- d. Activate those portions of the Corporate Emergency Response Organization when procedurally required or deemed appropriate.
- e. Notify the Communications Services Duty Officer of the event and consider activation of the Emergency News Center Organization if deemed appropriate.
- f. Maintain a record of GSEP related activities.

2) ACTIONS FOR ALERT CLASSIFICATIONS

- a. Complete all actions as listed above in part 1).
- b. Notify ANI and INPO within eight (8) hours of event classification.
- c. Activate the CEOF Organization.
- d. When the CEOF is activated, make contact and interface with the Emergency Restoration of Power Director, as necessary, concerning utilization of additional Company resources necessary to meet the needs of the Emergency.

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TABLE 6.1-2 (CONT)

2) SYSTEM POWER DISPATCHER

- a. Record NARS form information
- b. Immediately notify the Nuclear Duty Officer
- c. If CEOF or EOF assumes command and control, then report to MEO (CEOF or EOF).

3) NUCLEAR DUTY OFFICER

- a. Activate the CEOF Organization.
- b. Call affected station - verify plant status and event classification
- c. Initiate activation of additional Corporate Emergency Response Organizations (EOF and/or ENC Organizations) as required.
- d. If an EOF is to be activated, ensure access control is initiated.
- e. Notify the Institute of Nuclear Power Operation (INPO) and the American Nuclear Insurers (ANI) within 8 hours of ALERT classification.

4) MANAGER OF EMERGENCY OPERATIONS (CEOF or EOF)

- a. Assume all Command and Control responsibilities as listed above in 1) Acting Station Director/Station Director, if the CEOF/EOF is activated.
- b. Direct the overall Company response to the emergency event.

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7.1.4 Corporate EOF (CEOF)

The Corporate EOF (CEOF) is the location from which the Manager of Emergency Operations (CEO) will direct a staff in evaluating, coordinating, and directing the overall company activities involved with an emergency. Activation of the CEOF is mandatory upon declaration of an Alert, a Site Emergency or General Emergency.

When the EOF Organization is activated at the nearsite EOF, then the CEOF Organization shall report to the EOF Organization in a supporting role. The CEOF is located in the Downers Grove facility.

The CEOF is also the official backup EOF for Zion Station. The facility is equipped with the necessary communications and dose projection computer equipment should Zion's EOF (located within the Zion 10 mile EPZ) become uninhabitable.

7.1.5 Emergency Operations Facility (EOF)

The EOF is the location near the generating station that provides for the management of overall emergency response, the coordination of radiological and environmental assessments, the determination of recommended public protective actions, the management of recovery operations, and the coordination of emergency response activities with Federal, State, and local agencies. The EOF Organization functions under the Manager of Emergency Operations and is activated for all Site and General Emergency conditions.

Four major groups of emergency response personnel function at each EOF. They are:

- o Technical Support personnel
- o Advisory Support personnel
- o Environmental Assessment personnel
- o Emergency News personnel.

Technical Support personnel function under the direction of the Technical Support Manager and provide direction of all recovery operations.

Advisory Support personnel provide administrative services to the EOF and notification to responsible authorities.

Environmental Assessment personnel are under the direction of the Protective Measures Director and function to evaluate emergency situations that affect the public.

Emergency news personnel within the EOF gather newsworthy information from EOF Participants and relay this information to the news personnel in the appropriate Joint Public Information Center (JPIC).

January 31, 1996

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: John C. Hoyle, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - SECY-95-274 -
COMMONWEALTH EDISON COMPANY'S PROPOSAL TO USE
ITS CORPORATE EMERGENCY OPERATIONS FACILITY
AS AN INTERIM EMERGENCY OPERATIONS FACILITY

This is to advise you that the Commission (Chairman Jackson, exercising delegated authority pursuant to a delegation from the Commission*, in accordance with NRC Reorganization Plan No. 1 of 1980) has not objected to the staff's approval of Commonwealth Edison's plan for interim use of its corporate emergency operations facility as an interim emergency operations facility.

cc: Chairman Jackson
Commissioner Rogers
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

January 31, 1996

Russell f/Appropr Action

Cys: Taylor
Milhoan
Thompson
Blaha
LCohen, NRR ✓

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: John C. Hoyle, Secretary *John C. Hoyle*

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cc: Chairman Jackson
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Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)

* This decision was made after consultation with Commissioner Rogers, who has not indicated an objection to this negative consent item.

SECY NOTE: THIS SRM AND SECY-95-274 WILL BE MADE PUBLICLY
AVAILABLE 5 WORKING DAYS FROM THE DATE OF THIS SRM.