

Enclosure

2.19.016

**Letters of Concurrence from the Town of Plymouth and Commonwealth of Massachusetts
on the Proposed 30-Minute Declaration Time and 60-Minute Timeframe for Notification**

**LETTER OF AGREEMENT BETWEEN
PILGRIM NUCLEAR POWER STATION (PNPS)
AND THE TOWN OF PLYMOUTH**

I. PURPOSE

The purpose of this Letter of Agreement is to establish conditions regarding emergency planning notification and emergency response activities should an event at the plant require Emergency Plan activation, which include those events resulting from hostile actions. This LOA will take effect when all agreements and requirements for the maintenance and existence of an off-site Emergency Planning Zone are no longer in effect.

II. DEFINITIONS

Emergency Director – A member of the Pilgrim Emergency Response Organization (ERO) who is responsible for initiating emergency actions to limit the consequences of the incident and to bring the plant into a stable condition and planning recovery actions.

Town of Plymouth – Plymouth Fire Department and Emergency Management.

Licensee—Pilgrim Nuclear Power Station located in Plymouth, Massachusetts.

III. AGREEMENT

The Town of Plymouth and Licensee agree to the following:

Emergency Classification:

- A. The licensee will classify emergencies within 30 minutes of presented conditions


Initial Notification:

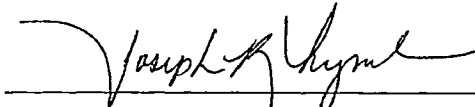
- A. It is the Licensee's duty and obligation to notify the Town of Plymouth as soon as possible but no later than 60 minutes after the event has been classified as either an Unusual Event or Alert. The initial notification shall be made, as specified in the Licensee and State plans. (More expedient notifications will be made for Initial Notification of selected security events as determined by the Licensee).
- B. The Licensee will notify the Town of Plymouth as soon as possible but no later than 60 minutes after an Unusual Event emergency condition has been observed but immediately terminated. Notification shall be made, as specified in the Licensee and State plans.
- C. The Licensee agrees to notify the Town of Plymouth as soon as possible but no later than 60 minutes after a decision has been reached by the Licensee

on a change in classification.

- D. The Licensee and the Town of Plymouth agree to exchange and coordinate in the maintenance, updating, and exercise of both Licensee and State Emergency Plan and Emergency Procedure changes that pertain to those elements of interface prior to implementing the change.
- E. The Pilgrim Emergency Director will be the point of contact for the Town of Plymouth representatives. Responsibilities of the Town of Plymouth and Licensee personnel will be as outlined in their respective Emergency Plans.
- F. To maintain public confidence and to avoid public apprehension, information regarding an emergency declaration shall be released to the public as soon as possible and in a coordinated manner through the Commonwealth's Public Information Officer (PIO).
- G. The Licensee shall notify the Commonwealth as soon as possible but no later than 60 minutes of any plant event that does not constitute an emergency classification but is significant enough to have the Licensee notify the NRC or issue a news release. This includes issues involving Law Enforcement, EMS or Fire Department resources.
- H. This agreement may be amended by subsequent agreement between the Town of Plymouth and the Licensee.
- I. This agreement shall be effective upon implementation of the Permanently Defueled Emergency Plan. This agreement shall remain in effect until and unless it is renegotiated or replaced.

LETTER OF AGREEMENT BETWEEN
PILGRIM NUCLEAR POWER STATION (PNPS)
AND THE TOWN OF PLYMOUTH


FIRE CHIEF *Town Manager* Feb 8 2019
Town of Plymouth Massachusetts DATE


PILGRIM NUCLEAR POWER STATION 2/11/19
DATE

**LETTER OF AGREEMENT BETWEEN
PILGRIM NUCLEAR POWER STATION (PNPS)
AND THE COMMONWEALTH OF MASSACHUSETTS**

I. PURPOSE

The purpose of this Letter of Agreement is to establish conditions regarding emergency planning notification and emergency response activities should an event at the plant require Emergency Plan activation, which include those events resulting from hostile actions. This LOA will take effect when all agreements and requirements for the maintenance and existence of an off-site Emergency Planning Zone are no longer in effect.

II. DEFINITIONS

Emergency Director—A member of the Pilgrim Emergency Response Organization (ERO) who is responsible for initiating emergency actions to limit the consequences of the incident and to bring the plant into a stable condition and planning recovery actions.

The Commonwealth of Massachusetts—state emergency management agency.

Licensee—Pilgrim Nuclear Power Station located in Plymouth, Massachusetts.

III. AGREEMENT

The Commonwealth and Licensee agree to the following:

Emergency Classification:

- A. The licensee will classify emergencies within 30 minutes of presented conditions

Initial Notification:

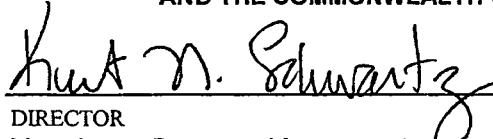
- A. It is the Licensee's duty and obligation to notify the Commonwealth as soon as possible but no later than 60 minutes after the event has been classified as either an Unusual Event or Alert. The initial notification shall be made, as specified in the Licensee and State plans. (More expedient notifications will be made for Initial Notification of selected security events as determined by the Licensee).
- B. The Licensee will notify the Commonwealth as soon as possible but no later than 60 minutes after an Unusual Event emergency condition has been observed but immediately terminated. Notification shall be made, as specified in the Licensee and State plans.
- C. The Licensee agrees to notify the Commonwealth as soon as possible but no later than 60 minutes after a decision has been reached by the Licensee on a

change in classification.

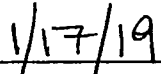
- D. The Commonwealth agrees that the Licensee may terminate an Unusual Event emergency without obtaining State concurrence. However, it is the Licensee's obligation to notify the Commonwealth when it terminates the Unusual Event.
- E. De-escalation from an Alert to the recovery phase or termination of the emergency will not be made without the concurrence of responsible State officials.
- F. The Commonwealth agrees to inform the Licensee of any protective actions it chooses to implement.
- G. The Licensee and Commonwealth agree to exchange and coordinate in the maintenance, updating, and exercise of both Licensee and State Emergency Plan and Emergency Procedure changes that pertain to those elements of interface prior to implementing the change. The Licensee and State will discuss and coordinate the effective date of these changes so as not to render either Emergency Plan ineffective or unworkable.
- H. The Licensee and the State agree to exchange in a timely manner all information known and available for emergency decision making, regarding plant conditions, plant radiological releases, off-site radiological impact and other plant technical data.
- I. The Pilgrim Emergency Director will be the point of contact for Commonwealth representatives. Responsibilities of the Commonwealth and Licensee personnel will be as outlined in their respective Emergency Plans.
- J. To maintain public confidence and to avoid public apprehension, information regarding an emergency declaration shall be released to the public as soon as possible and in a coordinated manner through the Commonwealth's Public Information Officer (PIO).
- K. Pilgrim Nuclear Power Station will use a dose assessment methodology acceptable to the Department of Public Health Radiation Control Program.
- L. In the event of a radiological emergency requiring offsite response or monitoring, the Licensee agrees to make an Environmental Laboratory (E- Lab) available to the Commonwealth as close as reasonably possible to the plant for radiochemical processing of all types of environmental media sampled.
- M. An Alert shall be deemed to have terminated when, in the agreement of both the Commonwealth and Licensee, there is no longer a need for either consideration of protective action or surveillance related to off-site protective action. Close out of the emergency classification shall be as outlined in respective Emergency Plans.

- N. The Licensee shall notify the Commonwealth as soon as possible but no later than 60 minutes of any plant event that does not constitute an emergency classification but is significant enough to have the Licensee notify the NRC or issue a news release. This includes issues involving Law Enforcement, EMS or Fire Department resources.
- O. This agreement may be amended by subsequent agreement between the Commonwealth and the Licensee.
- P. This agreement reflects the Licensee's current obligations to the Commonwealth under the current statutory, regulatory, and NRC license requirements with which the Licensee must comply ("Legal Requirements"), as well as the current NRC-approved PNPS Emergency Plan. In the event there is (1) a change to the Licensee's Legal Requirements; or (2) a revision to the PNPS Emergency Plan, the Commonwealth and Licensee agree to engage in good faith negotiations to amend or terminate this agreement, as appropriate, to reflect the changed Legal Requirements and/or revisions to the PNPS Emergency Plan. If the Commonwealth and Licensee are unable to negotiate a mutually-acceptable amended agreement, to the extent that the Licensee's obligations under this agreement exceed or differ from the changed Legal Requirements, the Commonwealth agrees that the Licensee is only obligated to comply with the applicable Legal Requirements.
- Q. This agreement shall be effective upon implementation of the Permanently Defueled Emergency Plan. This agreement shall remain in effect until and unless it is renegotiated or replaced in accordance with paragraph III P.
- R. It is agreed that the Memorandum of Understanding (MOU) Between Pilgrim Nuclear Power Station (PNPS) and the Commonwealth of Massachusetts Regarding the Alert and Notification System (ANS) will no longer be in effect when all agreements and requirements for the maintenance and existence of an off-site Emergency Planning Zone are no longer in effect.
- S. It is agreed that the Agreement for the Operation of a NOAA Weather Radio Transmitter by Pilgrim Nuclear Power Station, Plymouth, MA will no longer be in effect with the implementation of the Permanently Defueled Emergency Plan.

LETTER OF AGREEMENT BETWEEN
PILGRIM NUCLEAR POWER STATION (PNPS)
AND THE COMMONWEALTH OF MASSACHUSETTS



DIRECTOR
Massachusetts Emergency Management Agency
(MEMA)



DATE



PILGRIM NUCLEAR POWER STATION



DATE