



Commonwealth Edison

1400 Opus Place
Downers Grove, Illinois 60515

September 27, 1994

William Russell, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Attn: Document Control Desk

Subject: Byron Nuclear Power Station Units 1 and 2
State of Illinois for Byron 1995 Exercise Participation
Submittal
NRC Docket Numbers 50-454 and 50-455

References: (1) 10 CFR 50, Appendix E, "Emergency Planning and
Preparedness for Production and Utilization Facilities"

Dear Mr. Russell:

10 CFR 50 Appendix E, Section F.3.c requires that "At least once every 7 years all States within the plume exposure pathway EPZ for a given site must fully participate in an offsite exercise for that site. This exercise must involve full participation by local governments within the plume exposure pathway EPZ."

The State of Illinois is conducting an Ingestion Pathway Exercise at Commonwealth Edison's Dresden Station in 1995. This exercise is designed to involve the State of Indiana in addition to full participation of the State of Illinois. Based on the existing State of Illinois six year cycle for 1995, Dresden was to have been a partial plume exercise and Byron was to be a full plume exercise. Illinois has requested that FEMA change the 1995 full scale exercise at Byron to a partial participation exercise for Illinois and that Dresden be designated the full scale exercise. (Attachment 1)

Ogle County, the only county in Byron's 10 mile EPZ, will participate fully in the 1995 exercise. Partial participation by the State of Illinois will include all interfaces required to support a full participation exercise of County and Utility

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Mr. William Russell

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operations. The State of Illinois' participation in the Dresden full scale exercise will demonstrate all remaining functions which would have been performed in the Byron full scale exercise. In addition, because of Commonwealth Edison's six nuclear sites and Illinois Power's Clinton site the State of Illinois participates in a full scale exercise at some facility at least once per year.

ComEd request that the NRC grant a one time exemption for full scale State participation at Byron for the existing exercise cycle. The next full scale exercise conducted at Byron Station is scheduled for 2001.

Please direct any questions that you may have concerning this response to me at (708) 663-7292 or Mr. Terry Blackmon at (708) 663-2097.

Respectfully,



Martin J. Vonk
Generic Issues Administrator
Nuclear Regulatory Services

Attachments: 1) D. Smith (Illinois Emergency Management Agency) to L. Bailey (Federal Emergency Management Agency) dated September 21, 1994

cc: J.B. Martin, Regional Administrator - RIII
J. McCormick-Barger, RIII
R. Licus, RIII
R. Capra, Project Director III-2 NRR
G. Dick, Byron Project Manager - NRR
H. Peterson, Senior Resident Inspector - Byron
R. Wight, Illinois Department of Nuclear Safety
D. Smith, Illinois Emergency Management Agency



Illinois Emergency Management Agency

110 East Adams • Springfield, Illinois • 62706

(217) 782-7860

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Mr. Larry Bailey
Deputy Director
Preparedness, Training and Exercise Division
Federal Emergency Management Agency
Region V
175 W. Jackson Blvd., 4th Floor
Chicago, IL 60604

Dear Mr. Bailey:

The State of Illinois is scheduled to conduct an ingestion pathway exercise in July 1995. Preparations for this exercise are underway. There are several issues that need to be resolved early in the exercise planning process.

EXERCISE DATE

Because of the many activities associated with an ingestion pathway exercise, we intend to conduct the exercise on Tuesday and Wednesday, July 11 and 12, rather than Wednesday and Thursday, July 12 and 13. Please change the FEMA Region V schedule to reflect this change. The State of Illinois will continue to conduct plume-only exercises on Wednesdays.

LEVEL OF STATE PARTICIPATION

Currently, the 1995 Dresden exercise is scheduled to be a partial scale exercise for the plume phase. Because of the comprehensive nature of an ingestion pathway exercise, it is advantageous for the State to participate fully in the plume phase of an ingestion pathway exercise. We are proposing that the State change the level of participate in the plume portion of the Dresden exercise so that the State EOC and REAC will be fully activate and the field teams will be deployed for both the plume and ingestion phases.

We are also proposing to change the 1995 full scale exercise at Byron to a partial participation exercise for the State. The State intends to demonstration objectives associated with a full scale plume exercise during the Dresden exercise. State EOC, REAC and field team activities are the same for the Dresden EPZ as for the Byron EPZ. Therefore the functions to be demonstrated at the Byron exercise will already have been demonstrated during the Dresden exercise. In addition, the State can save travel funds if the field teams are not required to deploy again for the Byron exercise.

We are requesting that the cycle of full scale exercises be changed in 1995 only. We propose to conduct a full plume phase exercise at Dresden in 1995 and a partial scale exercise at Byron in 1995. The cycle beyond 1995 will not change from that indicated on the attached exercise matrix.

This change in the 1995 exercises will result in full participation exercises at Dresden in 1995 and 1997. The last full scale exercise for the Byron EPZ was conducted in 1989 and the next will be conducted in 2001. This is in compliance with FEMA exercise requirements. Commonwealth Edison will be requesting that the NRC approve this change also.

RELOCATION CENTER DEMONSTRATION

The State of Illinois typically conducts a full relocation and decontamination center demonstration in conjunction with the annual full scale exercise. Assuming that our request to change the full scale exercise in 1995 is approved, we wish to reduce the level of the Dresden relocation and decontamination center demonstration to a facility walk-through. During the walk-through, the reception facility will be available for FEMA to inspect and local officials responsible for staffing the facility will be available for an interview. In 1994, a successful full scale demonstration was conducted. Another full scale demonstration will be conducted in 1996 in conjunction with the LaSalle exercise at Illinois Valley Community College (IVCC). IVCC is also a primary reception center for the Dresden EPZ.

LEVEL OF KENDALL COUNTY PARTICIPATION

Since the State of Indiana is participating in the Dresden ingestion pathway exercise, it is necessary to use meteorology with wind into the east. The Kendall County, Illinois, line lies approximately 5 miles to the north of Dresden Station. The wind direction necessary to involve Indiana causes Kendall County to be spared impact by the scenario. Because of the lack of impact on Kendall County, we are requesting that the County be granted an exemption from full participation in the 1995 Dresden exercise. If the exemption is granted, Kendall County will partially participate by staffing the EOC with the County ESDA Coordinator and a Sheriff's Department representative.

FEDERAL PARTICIPATION

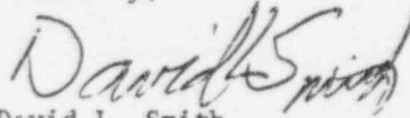
Federal support during the response to and recovery from any type of major disaster is critical. This is particularly true for accidents at nuclear power stations. Conducting an ingestion pathway exercise is difficult without some Federal participation because of the large Federal presence that is expected during an actual accident. For this reason, we are requesting some level of Federal participation in the 1995 Dresden ingestion pathway exercise.

We realize that full participation of the Federal agencies with responsibilities in the FRERP is unreasonable. However, it is highly desirable that components of several key Federal agencies be encouraged to participate at one level or another. In particular, such play would provide more realism for the exercise and allow for the functional demonstration of coordination and communication objectives. The USDA has expressed a willingness to support IDNS RAFT field activities and those of the Illinois Department of Agriculture in the State EOC. Limited participation by the Federal EPA, FDA and DOE in whatever form is deemed mutually appropriate would be beneficial and appreciated. Since FEMA is the coordinating agency for Federal assistance, it would be beneficial to have a FEMA representative simulating the Regional Operations Center.

Mr. Larry Bailey
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We appreciate your consideration of these requests. With the extended preparation time needed for ingestion pathway exercises, it is important to resolve these issues early. If you have any questions, please call Jana Fairrow at 217/782-9341.

Sincerely,

A handwritten signature in dark ink, appearing to read "David L. Smith". The signature is fluid and cursive, with the first name "David" being more prominent.

David L. Smith
Chief, Division of Field Services

DLS:jmb

cc: Terry Blackmon, CECO
Andrea Pepper, IDNS

STATE OF ILLINOIS EXERCISE SCHEDULE

	87	88	89	90	91	92	93	94	95	96	97	98	99	00
DRESDEN	P	CECo	P	CECo	F	CECo	P	CECo	P	CECo	F	CECo	P	CECo
QUAD CITIES	CECo	F	CECo	P	CECo	P	CECo	F	CECo	P	CECo	P	CECo	F
ZION	F	CECo	P	CECo	P	CECo	F	CECo	P	CECo	P	CECo	F	CECo
LASALLE	CECo	P	CECo	F	CECo	P	CECo	P	CECo	F	CECo	P	CECo	P
BYRON	P	CECo	F	CECo	P	CECo	P	CECo	F	CECo	P	CECo	P	CECo
BRAIDWOOD	P	CECo	CECo	P	CECo	F	CECo	P	CECo	P	CECo	F	CECo	P
CLINTON	F	P	IP	P	IP	F	IP	P	IP	P	IP	F	IP	P
STATE	F	F	F	F	F	FF	F	F	F	F	F	FF	F	F

F - FULL SCALE

P - PARTIAL SCALE

CECo - COMMONWEALTH EDISON COMPANY

IP - ILLINOIS POWER COMPANY

DATE ISSUED: 10/91