

Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101-1179 • 215/774-5151

Harold W. Kaiser
Senior Vice President-Nuclear
215/774-4194

SEP 17 1992

Director of Nuclear Reactor Regulation
Attention: Mr. C. L. Miller, Project Director
Project Directorate I-2
Division of Reactor Projects
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

**SUSQUEHANNA STEAM ELECTRIC STATION
REQUEST FOR EXEMPTION : EMERGENCY
PLAN EXERCISE REQUIREMENTS
PLA-3852 FILES A17-13/R41-2**

Docket Nos. 50-387
and 50-388

Dear Mr. Miller:

At the invitation of the Nuclear Regulatory Commission, Pennsylvania Power & Light Company (PP&L) has agreed to serve as host of Federal Field Exercise 3, the third full-scale demonstration of the Federal Radiological Emergency Response Plan. This exercise, referred to as FFE-3, will be held February 22-25, 1992 simulating response to a severe radiological accident at the Susquehanna Steam Electric Station. In consideration of this participation, PP&L is seeking an exemption from NRC requirements for conduct of an evaluated emergency plan exercise at Susquehanna in 1993.

The primary intent of FFE-3 is demonstration of federal support and assistance to utility, local and state response organizations. A major lesson learned from the second full Federal Field Exercise (conducted at the Zion station in 1987) was that staging an FFE in conjunction with a regulatory evaluation is counterproductive. In such an environment, NRC resources are diverted from response roles being demonstrated, and participants feel inhibited from fully utilizing federal capabilities. Consequently, to ensure its primary objectives are achieved, FFE-3 was designated by NRC as a non-evaluated exercise for the licensee participant.

4209220375 190015

10/21

~~4209220375 190015~~
~~ADUCK 05000387~~

FOI/1
11/11

Each licensee, however, is required per 10CFR50 Appendix E, Section IV.F to conduct an annual exercise of its emergency plan and to conduct a biennial exercise involving participation of state and local authorities within the plume exposure pathway EPZ. The most recent NRC-observed partial-participation exercise of the Susquehanna Emergency Plan was February 19, 1992 and the most recent biennial exercise with full state and local participation was October 16, 1991.

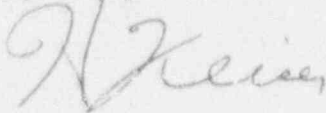
Acceptable performance of the exercise requirements in Section IV.F is determined by fulfillment of criteria as set forth in NUREG-0654, Rev.1. These criteria call for NRC observation, evaluation and critique of the required exercise. To afford NRC the opportunity to evaluate a Susquehanna exercise in 1993, a second, full-scale, evaluated exercise would have to be conducted. This would impose undue hardship and costs on Pennsylvania Power & Light Company significantly in excess of those contemplated when the regulation was adopted and of those incurred by other licensees.

Accordingly, Pennsylvania Power & Light Company hereby requests a one-time exemption from the requirements of 10CFR50 Appendix E, Section IV.F.2 and Section IV.F.3. This request is made pursuant to 10CFR50.12(a), under special circumstances as set forth under (a)(2)(iii) of that same part. Specifically, it is requested that PP&L be exempted from the annual requirement for an evaluated exercise of its Susquehanna Emergency Plan in 1993, from the biennial requirement for full participation of state and local authorities in an evaluated exercise during 1993, and from the requirement for an evaluated state exercise of its plans and preparedness related to ingestion pathway measures at least once every five years. The next NRC evaluated exercise of the Susquehanna emergency plan will be conducted in 1994, the next evaluated biennial exercise with state and local participation will be conducted in 1995, and the next evaluated ingestion exposure pathway exercise will be conducted no later than 1998.

The requested exemption is authorized by law and consistent with the common defense and security. The attachment to this letter provides a more detailed description of the objectives, scope and extent of play planned for FFE-3. This description demonstrates that the Susquehanna Emergency Plan will be adequately exercised in 1993 in a manner that meets the underlying intent of the regulation and therefore the requested exemption presents no undue risk to the health and safety of the public. FFE-3 offers a unique opportunity to demonstrate the enhanced level of protection which full federal response provides to the public at the Susquehanna station and throughout the country, justifying a departure from the normal exercise methodology.

If you have any questions regarding this application, please contact James M. Minneman,
Supervisor-Nuclear Emergency Planning at (717) 542-3233.

Very truly yours,



H. W. Keiser

Attachment

cc: NRC Document Control Desk (original)
 NRC Region I
 Mr. G. S. Barber, NRC Sr. Resident Inspector
 Mr. J. J. Raleigh, NRC Project Manager
 Mr. R. A. Erickson, NRR/PEPB-OWFN
 Mr. A. S. Mohseni, NRR/PEPB-OWFN
 Mr. R. W. Cooper, NRC Region I

OBJECTIVES, SCOPE AND EXTENT OF PLAY FOR FFE-3

The overriding purpose for conducting FFE-3 is demonstration under actual field conditions of federal response resources and capabilities in support of state and local governments.

OBJECTIVES

To facilitate accomplishment of this basic purpose, several overall objectives have been established:

Demonstrate activation of the Federal Radiological Emergency Response Plan (FRERP), including transition of federal response from one stage to another.

Demonstrate federal onscene operations center functions including the Federal Radiological Monitoring and Assessment Center (FRMAC), the Disaster Field Office (DFO), and the Joint Information Center (JIC).

Demonstrate effectiveness of interfaces and communications between federal agencies, state and local authorities and the licensee.

Demonstrate the adequacy of federal agency procedures, training and resources in addressing state and local needs.

Demonstrate effectiveness in keeping the White House and Congress informed of the situation and of federal support actions.

Demonstrate accuracy, consistency and timeliness in release of public information, and coordination of such information among federal agencies, offsite authorities and the licensee.

Demonstrate adequacy of federal interagency plans and procedures for performing functions at federal onscene operations centers.

Demonstrate formulation of viable solutions to reentry, return, relocation and recovery problems utilizing agency developed plans and procedures.

Demonstrate American Nuclear Insurers (ANI) response to the event, implementing Price Anderson legislation provisions for financial reimbursement.

Demonstrate application of a Presidential Declaration of Emergency under the Stafford Act, including implementation of applicable provisions of the Federal Response Plan (FRP).

Demonstrate response capability improvements which resulted from lessons learned in earlier exercises or real-world events.

SCOPE AND EXTENT OF PLAY

Participants

FFE-3 provides for exercise play during the plume, intermediate, and recovery phases of a simulated nuclear power plant accident. Participating organizations will include:

- Pennsylvania Power & Light Company
- Risk Municipalities
- Risk Counties
- Support Counties
- Ingestion Pathway Counties
- Pennsylvania Emergency Management Agency
- Pennsylvania Department of Environmental Resources/Bureau of Radiation Protection
- Office of the Governor
- U.S. Department of Agriculture
- U.S. Department of State
- Environmental Protection Agency
- Federal Emergency Management Agency
- U.S. Department of Transportation
- U.S. Department of Health and Human Services
- Nuclear Regulatory Commission
- U.S. Department of Commerce
- American Red Cross
- U.S. Department of Energy
- U.S. Department of Veterans Affairs
- National Communications System
- General Services Administration
- American Nuclear Insurers

Organizations will participate to varying degrees consistent with exercise objectives, response plan provisions, and timeline constraints.

Facilities

A wide range of emergency response facilities will be employed at various times during the exercise, including:

- Control Room (simulator)
- Technical Support Center
- Operations Support Center
- Emergency Operations Facility
- General Office Engineering Support Center
- Media Operations Center (also serves as federal Joint Information Center)
- Risk Municipality Emergency Operations Centers
- Risk, Support and Ingestion Pathway County Emergency Operations Centers
- State Emergency Operations Center
- Disaster Field Office
- Federal Radiological Monitoring and Assessment Center
- Federal Agency Headquarters and Regional Office Emergency Response Centers

Exercise Timeline

FFE-3 will be conducted over four days in February 1993 with full exercise play encompassing 31 hours. Radiological assessment elements will also conduct limited activity during two nighttime shifts for an additional 19 hours of restricted scope play. The basic exercise timeline is as follows:

Monday 2/22/93 - Scenario Day 1 Plume Phase

1530	Commence Exercise.
2300	Suspend full exercise play, Continue play for Dept. of Energy immediate response teams and FRMAC advance elements.

Tuesday 2/23/92 - Scenario Day 2 Ingestion/Intermediate Phase

0800	Recommence full exercise play with phased arrival of federal personnel.
1800	Suspend full exercise play. Continue limited radiological assessment play at FRMAC.

Wednesday 2/24/92 - Scenario Day 5 Return Phase

0400	Suspend limited FRMAC and adjust jump break message.
0800	Deliver break message detailing simulated two day time jump.
1030	Recommence full exercise play.
1800	Suspend full exercise play.

Thursday 2/25/92 - Scenario Day 6 Recovery Phase

0800	Recommence full exercise play.
1400	Conclude exercise and collect participant comments.

Extent of Play

During the Plume Phase, Pennsylvania Power & Light Company will demonstrate activation and deployment of its emergency response organization, including full manning of its emergency response facilities and dispatch of inplant and offsite field teams. Risk municipalities and risk counties will respond, manning their Emergency Operations Centers and implementing their emergency response plans. Support counties will establish demonstration reception and mass care centers. The Commonwealth will activate its Emergency Operations Center and dispatch representatives to the scene in accordance with its plans. In accordance with the FRERP, initial activation of federal response elements will proceed including NRC and FEMA regional teams and headquarters centers including the NRC Operations Center and the FEMA Emergency Information and Coordination

Center. Planning will proceed towards potential implementation of the FRP. PP&L will handle media contacts through its Media Operations Center, where the NRC will establish an onsite Joint Information Center. The Commonwealth will maintain its news center in Harrisburg, and federal agencies will interface with media from their headquarters.

The Ingestion/Intermediate Phase marks the beginning of full federal involvement and is characterized by concentration on offsite response, both radiological and non-radiological. The FRMAC will be fully activated, supporting the gathering and assessment of environmental radiological data. In addition to the federal contingent which comprises the FRMAC staff, the Commonwealth and PP&L will assign technical and liaison personnel to the facility. Extensive field monitoring and analysis will be directed from this center. The Commonwealth will transfer emergency management resources to an onscene coordinating center collocated with the DFO, which will be fully manned and providing applicable Emergency Support Functions. Onsite play will be simulated by a control cell located in the Technical Support Center. The Emergency Operations Facility will remain activated, serving as base of operations for the utility emergency response organization and for the NRC expanded site team. While Municipal response activity will cease, exercise play will continue at a reduced level in the risk, support and ingestion pathway counties. Federal headquarters facilities will remain in operation, supporting the field response efforts. Elements of the joint information system will remain functional, including the onscene JIC/MOC, the PEMA news center in Harrisburg, and federal media centers in Washington.

Considerable exercise time (13 1/2 hours) is being devoted to recovery phase activity. The Commonwealth will implement the recovery provisions of its emergency plan including establishment of its predesignated recovery organization. Recovery plans will be initiated with input from all major participants including PP&L, affected counties and federal agencies. Recovery phase plans will encompass activity such as reinstatement of essential services in evacuated areas, establishment of restricted areas, return of evacuated citizens, decontamination of buildings and lands, removal of protective action orders, provision of alternative housing, long term environmental monitoring, population health studies and provision of financial assistance and reimbursement. Recovery phase play will take place in the same facilities which were utilized for the ingestion/intermediate phase.

CONCLUSIONS

The objectives, scope and extent of play for FFE-3 go well beyond that normally contemplated for an annual, biennial or ingestion pathway exercise. FFE-3 provides for full demonstration of the emergency response plans for PP&L, local governments in the emergency planning zones surrounding Susquehanna Steam Electric Station, and the Commonwealth of Pennsylvania. In addition, FFE-3 will demonstrate integration of federal government agency response in support of state, local, and utility organizations. All phases of emergency response will be demonstrated, with particular emphasis on the ingestion/intermediate and recovery phases. In this light, an exemption from the requirements of 10CFR50 Appendix E, Section IV.F for PP&L and its Susquehanna station based on participation in FFE-3 presents no undue risk to the health and welfare of the public. Rather, involvement in this undertaking enhances the overall level of protection provided and strengthens federal response to a nuclear accident anywhere in the country.