

# PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET

P.O. BOX 8699

PHILADELPHIA, PA. 19101

SHIELDS L. DALTROFF  
VICE PRESIDENT  
ELECTRIC PRODUCTION

(215) 841-5001

June 5, 1985

Docket Nos. 50-277  
50-278

Mr. Hugh Thompson, Jr.  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Thompson:

Philadelphia Electric Company is hereby requesting a permanent change from the originally scheduled annual PBAPS emergency preparedness exercise date from the month of June to the month of October. The 1985 exercise would be held on October 17, 1985, assuming the acceptability of the request.

As a result of a consensus reached among the participants at the FEMA Region III scheduling conference held in January 1985, for CY85 and CY86 RERP exercises, PECO's Peach Bottom exercise was rescheduled. Correspondence relating to that meeting is attached. Participants in the meeting included the Nuclear Regulatory Commission, Federal Emergency Management Agency, Pennsylvania Emergency Management Agency and the Maryland Emergency Management and Civil Defense Agency.

The proposed exercise schedule exceeds the exercise frequency as set forth in 10CFR 50, Appendix E, Section IV F and NUREG-0654/FEMA REP 1-Rev. 1. The past emergency response exercises have been held in June 1982, June 1983, and October 1984. Philadelphia Electric was granted a one-time exemption on October 3, 1984 to hold the exercise on October 17, 1984 rather than in June 1984.

We believe the proposed permanently scheduled date of October meets the needs of NUREG-0654/FEMA REP 1-Rev. 1 for the following reasons:

1. The 1984 annual emergency response exercise for Peach Bottom was conducted on October 17, 1984 with no significant on-site deficiencies. All off-site deficiencies have been resolved.

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2. A permanent October exercise date provides for the exercise to be run under varied weather conditions. October weather in the Peach Bottom site area varies from summer conditions to late fall conditions.
3. The scheduling of the Peach Bottom exercise in October allows Chester County, which lies in both the EPZ of Limerick Generating Station and that of Peach Bottom, to correct deficiencies between exercises at both plants.
4. An October exercise gives an approximate 11 month exercise time between Peach Bottom and Three Mile Island for York and Lancaster Counties which are in the PBAPS and Three Mile Island EPZs. This allows sufficient time for them to correct deficiencies. Both Counties will be exercising with Three Mile Island in November 1985 and we anticipate their participation with Peach Bottom in October 1986.
5. Many emergency response personnel, procedures and practices are the same for both Limerick and Peach Bottom. Limerick successfully completed an exercise on April 3, 1985. Peach Bottom is now in the process of implementing many Limerick practices. Additionally, this six month span from April to October allows deficiencies identified at LGS and generic to PBAPS to be appropriately corrected and personnel trained and vice versa.
6. The required semi-annual drills will be completed during the first six months of 1985 ensuring personnel are properly prepared. Deficiencies identified during these exercises will then be able to be corrected prior to the October exercise.
7. An advanced tele-communications switch is being installed at Peach Bottom (similar to the one installed at Limerick). The October date provides time to test the switch and train on-site and off-site personnel.
8. A permanent date of October allows participation by school districts in those calendar years when off-site participation is necessary.

For these reasons, PECO requests an exemption to allow a permanent change in schedule of the annual emergency response



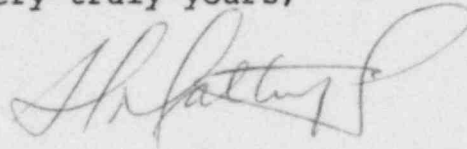
Mr. Hugh Thompson, Jr.

June 5, 1985

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from June to October. If you have any questions regarding this matter please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "J. H. Thompson, Jr.", written in dark ink.

Attachment

cc: T. P. Johnson  
Resident Site Inspector  
Peach Bottom





Federal Emergency Management Agency  
REGION III

January 21, 1985

RECEIVED  
JAN 23 1985  
R. A. KANKUS

Ms. Roberta A. Kankus  
Philadelphia Electric Company  
2301 Market Street  
S7-1  
Philadelphia, Pennsylvania 19101

Dear Ms. Kankus:

Enclosed for your information and planning purposes is a copy of the Exercise Schedule for 1985/1986.

As in the past, any requests to change an exercise date will be submitted in writing to the Regional Assistance Committee Chairman so that changes will be coordinated with all agencies participating in the exercise.

Sincerely,

A handwritten signature in cursive script that reads "James R. Asher".

James R. Asher  
Chairman  
Regional Assistance Committee

Enclosure



### SCHEDULE OF REP EXERCISES FEMA - REGION III

**LEGEND:**



## EXERCISE

**EXERCISE MUST OCCUR WITHIN**

9 months



15 months

[illegible]