October 6, 2000

Mr. David A. Lochbaum
Nuclear Safety Engineer
Union of Concerned Scientists
1707 H Street, NW, Suite 600
Washington, DC 20006

Dear Mr. Lochbaum:

I am responding to the Petition that you submitted to the U.S. Nuclear Regulatory Commission (NRC) on March 14, 2000. This Petition was submitted pursuant to 10 CFR 2.206 on behalf of the Union of Concerned Scientists, the Nuclear Information & Resource Service, the PACE Law School Energy Project, and Public Citizen's Critical Mass Energy Project. We acknowledged receipt of the Petition in our letter to you dated April 5, 2000. In the Petition, you requested that the NRC issue an order to Consolidated Edison Company of New York (Con Ed) preventing the restart of Indian Point Nuclear Generating Unit 2 (IP2) or modifying the license for IP2 to limit it to zero power pending certain actions. Specifically, you requested the constraints until (1) all four steam generators are replaced, (2) the steam generator tube integrity concerns identified in Dr. Joram Hopenfeld's differing professional opinion (DPO)[1] and in Generic Safety Issue (GSI) 163 are resolved, and (3) potassium iodide tablets are distributed to residents and businesses within the 10-mile emergency planning zone (EPZ) or stockpiled in the vicinity of IP2. In a transcribed telephone conversation between you and Mr. Jim Riccio of Public Citizen, and the members of the NRC's Petition Review Board on March 16, 2000, you discussed the three requests in your Petition and stressed why you believed it important that the NRC take the requested actions.

In my April 5, 2000, letter, I stated that the staff had determined that your request as related to the concerns raised in Dr. Hopenfeld's DPO and GSI-163 and distribution or stockpiling of potassium iodide tablets does not meet the criteria set forth in NRC Management Directive 8.11, Part II, for review under 10 CFR 2.206. The basis for this determination was that they raise generic issues for which you had not provided sufficient facts specific to IP2 restart to support your request. However, I also stated in my letter that you could provide information in support of the plant-specific nature of these requests at a public meeting, requested by you, which was held on April 7, 2000. As a result of information provided at this meeting, and a supplement to your position dated April 12, 2000, the staff determined that your request regarding distribution of potassium iodide tablets met the criteria of 10 CFR 2.206. However, the additional information provided in your April 14, 2000, letter still did not provide plant-specific information necessary to consider Dr. Hopenfeld's DPO under the 2.206 process. You were informed of these determinations in a letter dated June 26, 2000.

[1] The DPO process provides for the review of concerns raised by individual NRC employees who disagree with a position adopted by the NRC staff.

In letters dated June 12, June 29, and July 13, 2000, you and Mr. Jim Riccio further supplemented the Petition. In the June 12, 2000, supplement, it was requested that IP2 not be allowed to restart until concerns identified in an internal Federal Emergency Management Agency (FEMA) memorandum dated May 12, 2000, were addressed. In your July 13, 2000, supplement, you requested reinstatement of your request that Dr. Hopenfeld's DPO be resolved prior to allowing IP2 to restart. In my letter to you dated August 31, 2000, I informed you that neither of these issues met the criteria for review under 10 CFR 2.206, and indicated the basis for that determination.

In the June 29, 2000, letter, you stated that 10 CFR Part 50, Appendix E requires each licensee at each site to conduct a full participation biennial exercise. Since the two nuclear units at the Indian Point site are owned by different licensees, you stated that the regulations would require each licensee to conduct a full-participation exercise every 2 years. This issue was accepted for review under 10 CFR 2.206, as stated in my letter dated August 31, 2000.

On June 2, 2000, the licensee submitted an extensive operational assessment for NRC approval in accordance with the IP2 technical specifications to support plant restart with the then-existing steam generators. However, prior to completion of the staff's review, the licensee voluntarily made the decision on August 8, 2000, to replace all four of the IP2 steam generators prior to plant restart. Therefore, the intent of this part of your Petition was, in effect, granted. In addition, the NRC and Federal Emergency Management Agency have concluded that the onsite and offsite emergency plans for IP2, including the provisions for selected distribution of potassium iodide, provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the site. Therefore, there is no basis to order the licensee to take additional measures to distribute or stockpile potassium iodide tablets in the vicinity of IP2. Finally, the NRC staff has determined that the full-participation exercise conducted by IP2 on June 24, 1998, met the biennial requirement for both onsite and offsite participation. Therefore, the licensee will remain in compliance with the biennial requirement until December 31, 2000. However, you did point out an ambiguity in the regulations, and we are evaluating whether a clarification to the regulations in this area is warranted.

The specific details of our evaluation of your Petition are in the enclosed Director's Decision (Decision). A copy of the Decision will be filed with the Secretary of the Commission in accordance with 10 CFR 2.206(c). As provided by this regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time. I have also enclosed a copy of the notice of "Issuance of Director's Decision under 10 CFR 2.206" that has been filed with the Office of the Federal Register for publication.

We recognize your efforts to bring these issues to our attention and appreciate your interest in and concern for ensuring public health and safety and the continued operational safety of nuclear power reactors. Please feel free to contact Patrick Milano, Senior Project Manager, at 301-415-1457 (e-mail pdm@nrc.gov) to discuss these or any future concerns you have regarding Con Ed or IP2.

Sincerely,

/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Enclosures: 1. Director's Decision 00-04
2. *Federal Register* Notice

cc w/encls: See next page

We recognize your efforts to bring these issues to our attention and appreciate your interest in and concern for ensuring public health and safety and the continued operational safety of nuclear power reactors. Please feel free to contact Patrick Milano, Senior Project Manager, at 301-415-1457 (e-mail pdm@nrc.gov) to discuss these or any future concerns you have regarding Con Ed or IP2.

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/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

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cc w/encls: See next page

Accession Number: ML003744967 *See previous concurrence

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DATE	10/03/00	10/03/00	10/03/00	09/29/00	08/30/00

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NAME	GTracy	WBateman	~~JGoldberg~~	FCongel	SBlack
DATE	09/26/00	09/29/00	~~10/ /00~~	09/29/00	10/02/00

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DD-00-04

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

OFFICE OF NUCLEAR REACTOR REGULATION
Samuel J. Collins, Director

In the Matter of	)	Docket No. 50-247
	)	
CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.	)	License No. DPR-26
	)	
(Indian Point Nuclear Generating Unit No. 2)	)	

DIRECTOR'S DECISION UNDER 10 CFR 2.206

I. INTRODUCTION

By letter dated March 14, 2000, Mr. David A. Lochbaum, on behalf of the Union of Concerned Scientists, the Nuclear Information & Resource Service, the PACE Law School Energy Project, and Public Citizen's Critical Mass Energy Project (Petitioners), pursuant to Section 2.206 of Title 10 of the Code of Federal Regulations (10 CFR 2.206), requested that the U.S. Nuclear Regulatory Commission (Commission or NRC) take action with regard to the Indian Point Nuclear Generating Unit No. 2, (IP2), owned and operated by the Consolidated Edison Company of New York, Inc. (Con Ed). The Petitioners requested that the NRC issue an order to the licensee preventing the restart of IP2, or modifying the license for IP2 to limit it to zero power, until (1) all four steam generators are replaced, (2) the steam generator tube integrity concerns identified in Dr. Joram Hopenfeld's differing professional opinion (DPO) and in Generic Safety Issue 163 (GSI-163) are resolved, and (3) potassium iodide tablets are distributed to residents and businesses within the 10-mile emergency planning zone (EPZ) or stockpiled in the vicinity of IP2. (The DPO process provides for the review of concerns raised by individual NRC employees who disagree with a position adopted by the NRC staff).

II. BACKGROUND

As a basis for the requests described above, the Petitioners stated that adequate protection of public health and safety dictated that the issues in their Petition be fully resolved before IP2 resumed operation. Additionally, the Petitioners requested that a public hearing on this Petition be conducted in the vicinity of the plant before its restart is authorized by the NRC.

The Commission informed the Petitioners in a letter dated April 5, 2000, that the staff had determined that the Petitioners' request that the NRC issue an order to prevent Con Ed from restarting IP2, or modify the license for IP2 to limit it to zero power, until the concerns raised in Dr. Hopenfeld's DPO and GSI-163 are resolved and until potassium iodide tablets are distributed to people and businesses within the 10-mile EPZ or stockpiled in the vicinity of IP2, does not meet the criteria set forth in NRC Management Directive 8.11, Part II, for review under 10 CFR 2.206. Based on additional information provided by the Petitioners at a public meeting held at NRC Headquarters on April 7, 2000, and information contained in a letter from the Petitioners dated April 12, 2000, the staff re-evaluated the potassium iodide issue and determined that it met the criteria for review under 10 CFR 2.206. However, the information provided by the Petitioners in an April 14, 2000, supplement to their Petition did not provide information uniquely applicable to IP2 and, therefore, the concerns raised in Dr. Hopenfeld's DPO and GSI-163 were not reviewed under 10 CFR 2.206. Both of these determinations were provided to the Petitioners in a letter dated June 26, 2000.

In letters dated June 12, June 29, and July 13, 2000, the Petitioners further supplemented the Petition. In the June 29, 2000, letter, the Petitioners stated that 10 CFR Part 50, Appendix E, requires each licensee at each site to conduct a full-participation biennial exercise. Because the two nuclear units at the Indian Point site are operated by different

licensees, the Petitioners stated that the regulations would require each licensee to conduct a full-participation exercise every 2 years. The Petitioners requested that the NRC not permit the restart of IP2 until the successful completion of such an exercise. By letter dated August 31, 2000, this issue was accepted for review under 10 CFR 2.206.

In the June 12, 2000, supplement, it was requested that IP2 not be allowed to restart until concerns related to IP2 emergency preparedness, identified in an internal Federal Emergency Management Agency (FEMA) memorandum dated May 12, 2000, were addressed. In the July 13, 2000, supplement, the Petitioners requested reinstatement for review under 10 CFR 2.206 of their request that Dr. Hopenfeld's DPO be resolved prior to allowing IP2 to restart. In the August 31, 2000, letter, the Petitioners were informed that neither of these issues met the criteria for review under 10 CFR 2.206, and were provided the basis for that determination, as discussed below. The criteria for the review of Petitions is contained in Part II of NRC Management Directive 8.11, which can be found at the NRC's website, http://www.nrc.gov/NRC/PUBLIC/2206/index.html.

III. DISCUSSION

Issue 1: Issue an Order to prevent restart of IP2 until all four steam generators are replaced

As the basis for the request that the NRC prevent the licensee from restarting IP2 until all four steam generators are replaced, the Petitioners state that IP2 is equipped with Westinghouse Model 44 steam generators and that all other operating power plants in the United States that were originally equipped with Westinghouse Model 44 steam generators have replaced them. The Petitioners also state that the IP2 steam generators have had an average of 10 percent of their tubes removed from service and that many other tubes have crack indications.

Response:

Following a steam generator tube failure on February 15, 2000, the licensee's inspection of the steam generator tubes found that greater than 1 percent of the inspected tubes in the IP2 steam generators contained indications of defects. Unlike most plant's technical specifications (TS), the IP2 TSs require NRC approval prior to restart of the plant for steam generators experiencing this percentage of defective tubes. By letter dated June 2, 2000, as supplemented on July 7 and July 27, 2000, ConEd submitted for NRC review an operational assessment of its steam generators in support of the proposed restart of the plant. Prior to completion of the staff review, the licensee informed the NRC that it had decided to replace the IP2 steam generators during the current outage. Therefore, the NRC staff ceased its review of the licensee's operational assessment. Because the intent of the Petitioners' request has been satisfied, i.e., the steam generators will be replaced prior to plant startup from the current outage, no further action on this request was determined to be necessary, and the request is, in essence, granted.

Issue 2: Issue an Order to prevent restart of IP2 until potassium iodide tablets are distributed to residents and businesses within the 10-mile emergency planning zone (EPZ) or are stockpiled in the vicinity of IP2.

As the basis for the request that the NRC prevent the licensee from restarting IP2 until potassium iodide (KI) tablets have been distributed to people and businesses within the 10-mile EPZ, the Petitioners state that the incident at IP2 demonstrated the potential for a more serious accident. The Petitioners state that KI has long been recognized for reducing the harm experienced by humans from airborne radioactivity and that by distributing KI tablets to people in the vicinity of the plant along with directions on when to administer the tablets, the health consequences of an accident can be reduced. Alternatively, the Petitioners state, sufficient KI

tablets for the people around the facility could be stockpiled in the communities for rapid distribution following an accident. In their supplement dated April 12, 2000, the Petitioners cited the high population density in the vicinity of IP2 as a unique circumstance which justifies this action.

Response:

The requirements for emergency planning for commercial nuclear power plants are established in the NRC's emergency planning regulations (10 CFR 50.47, 50.54 and Appendix E to Part 50). Criteria for meeting the emergency planning regulations for licensees and State and local governments are given in the joint NRC - FEMA document NUREG-0654/FEMA-REP 1, Rev. 1, issued in November 1980. As indicated in this document, the objective of emergency planning is to produce dose reductions for a wide spectrum of accidents that could potentially lead to offsite doses in excess of the U.S. Environmental Protection Agency's protective action guidelines (PAGs), including design basis events such as steam generator tube ruptures, and severe, beyond design basis, reactor accidents. Thus, the steam generator accidents postulated by the Petitioners are within the spectrum of accidents considered in the development of the planning basis for emergency preparedness at IP2.

The regulations, in 10 CFR 50.47(b)(10), require that emergency plans for nuclear power plants include a "range of protective actions" for the plume exposure pathway EPZ for emergency workers and the public. NUREG-0654 recognizes that KI may be one of the protective actions considered in the development of the onsite and offsite emergency plans. KI, if administered before or within a few hours of exposure to inhaled radioiodines, can reduce the radiological dose to the thyroid. Doses to the whole body and internal organs from other radionuclides associated with reactor accidents, such as noble gases and cesium, are not affected by the administration of KI. Thus, NRC and FEMA emergency planning guidance

emphasize evacuation, sheltering, and the interdiction of contaminated foodstuffs as the principal protective actions for the public.

The current Federal guidance to State and local governments on the distribution of KI was issued in July 1985 (50 FR 30258) by FEMA in its role as Chair of the Federal Radiological Preparedness Coordinating Committee (FRPCC). The 1985 Federal policy recommends providing KI to emergency workers and institutionalized persons, but does not recommend stockpiling or pre-distribution of KI for the public. The Federal Policy recognizes, however, that the responsibility for decisions on the distribution and use of Kl for the public resides with the State and, in some cases, local health authorities. The Federal policy lists a number of factors that State and local authorities should consider in deciding whether to distribute and use Kl for the general population, and indicates that the decision on whether Kl should be stockpiled and distributed to the general public around a particular site depends on local conditions.

The licensee's onsite emergency plan contains provisions for the distribution of KI to emergency workers. New York State and the local governments within the IP2 EPZ make KI available for emergency workers and institutionalized persons in facilities where evacuation is not possible or feasible, but have elected not to distribute or stockpile KI for the general public consistent with the current Federal KI policy. NRC and FEMA have concluded that the onsite and offsite emergency plans for IP2, including the provisions for KI, provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the site.

The NRC conducted a special proceeding in 1982-1984 to determine the extent to which the population around the Indian Point site affected the risk posed by an accident at the site, as compared to the spectrum of risks posed by other nuclear power plants. Among the issues considered was the need for predistribution of KI to the public. In the Commission decision

(CLI 85-06, 21 NRC at 1086), the Commission concluded that operation of the Indian Point Units 2 and 3 did not impose a risk to the public significantly greater than that imposed by other NRC licensed plants. Regarding KI, the Commission agreed with the conclusion of the Atomic Safety and Licensing Board that presided over the special proceeding (LPB-83-68, 18 NRC at 1008) on the lack of any need for predistribution of KI to the public. The Petitioners did not provide any information, nor are we aware of any new information, that would invalidate this conclusion.

The NRC is currently working with FEMA, the U.S. Food and Drug Administration, and other Federal agencies in reviewing the 1985 Federal KI policy. The NRC is also in the process of developing a proposed amendment to its emergency planning regulations that would require that consideration be given to including KI as a protective measure for the general public as a supplement to evacuation and/or sheltering. The Commission published a proposed rule in the Federal Register (64 FR 31737) on June 14, 1999, for a 90-day comment period. The proposed amendment, however, would not require that KI be made available for the general public; that decision would still be made by State and local governments. The Commission is currently considering the final rule on the consideration of KI in radiological emergency plans for nuclear power plants. In this connection, the NRC is also developing a guidance document to assist State and local decision makers in their consideration of the role and use of KI for the general public in their site-specific emergency plans.

Since both NRC and FEMA have concluded that the onsite and offsite emergency plans for IP2 provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the site, there is no basis to require the distribution or stockpiling of KI in the vicinity of IP2. Therefore, this request is denied.

Issue 3: The NRC should not allow restart of IP2 until after a full-participation emergency exercise has been successfully completed.

As a basis for this request, the Petitioners state that 10 CFR Part 50, Appendix E requires each licensee at each site to conduct a full participation biennial exercise. Because the two nuclear units at the Indian Point site are operated by different licensees, each licensee must conduct a full-participation exercise every 2 years.

Response:

Clearly the IP2 full-participation plume exposure pathway exercise conducted on June 24, 1998, met the biennial requirement for both onsite and offsite participation. The staff notes that since the offsite authorities that have a role under IP2's emergency plan also have roles under the emergency plans for other licensees (IP3 for State and local authorities; Nine Mile Point, FitzPatrick and Ginna for State authorities), a partial participation exercise can also meet the biennial requirement in accordance with Paragraph IV.F.2.c of 10 CFR Part 50 Appendix E.

Licensees and offsite authorities are faced with a difficult task to coordinate and schedule an exercise that involves multiple governmental agencies at the Federal, State, and local level. Many response organizations depend on volunteers. In order to accommodate this difficult task, IE Information Notice No. 85-55, “Revised Emergency Exercise Frequency Rule,” dated July 15, 1985, as well as FEMA-REP-14, “Radiological Emergency Preparedness Exercise Manual,” dated September 1991, allow exercises to be scheduled at any time during the calendar biennium. Therefore, the licensee will remain in compliance with the biennial requirement until December 31, 2000. As noted previously, the licensee informed the NRC that it had decided to voluntarily replace the IP2 steam generators during the current outage and

would plan to restart in fall 2000. Since the licensee plans to restart before December 31, 2000, an emergency preparedness exercise is not required prior to restart of IP2. Therefore, this request is denied.

The Petitioners did point out an ambiguity in the emergency preparedness regulations and the application of these regulations regarding co-located licensees on a site. The staff is evaluating whether a clarification to the regulations is warranted.

IV. CONCLUSION

For the reasons discussed above, the NRC staff concludes that, in essence, the request that the licensee be ordered to replace the existing steam generators prior to IP2 resuming operation is granted, in that the licensee has committed to this action. Although the other two issues concerning distribution or stockpiling of KI and the requirement to conduct biennial exercises have merit, the action requested was not necessary to ensure the licensee adhered to requirements of their license. However, the NRC staff concluded that a public meeting with the Petitioners to discuss the issues raised in the Petition and to provide an opportunity to provide additional information in support of their request was warranted. This meeting was held on April 7, 2000, at the NRC Headquarters offices. The staff's efforts regarding this Petition are complete.

A copy of the Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c). As provided for by that regulation, the Decision will constitute the action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

Dated at Rockville, Maryland,
this 6th day of October 2000.

7590-01-P

UNITED STATES NUCLEAR REGULATORY COMMISSION

CONSOLIDATED EDISON COMPANY OF NEW YORK, INC.

INDIAN POINT NUCLEAR GENERATING UNIT NO. 2

DOCKET NO. 50-247

ISSUANCE OF DIRECTOR'S DECISION UNDER 10 CFR 2.206

By letter dated March 14, 2000, Mr. David A. Lochbaum, on behalf of the Union of Concerned Scientists, the Nuclear Information & Resource Service, the PACE Law School Energy Project, and Public Citizen's Critical Mass Energy Project (Petitioners), pursuant to Section 2.206 of Title 10 of the Code of Federal Regulations (10 CFR 2.206), requested that the U.S. Nuclear Regulatory Commission (Commission or NRC) take action with regard to the Indian Point Nuclear Generating Unit No. 2, (IP2), owned and operated by the Consolidated Edison Company of New York, Inc. (Con Ed). The Petitioners requested that the NRC issue an order to the licensee preventing the restart of IP2, or modifying the license for IP2 to limit it to zero power, until (1) all four steam generators are replaced, (2) the steam generator tube integrity concerns identified in Dr. Joram Hopenfeld's differing professional opinion (DPO) and in Generic Safety Issue 163 (GSI-163) are resolved, and (3) potassium iodide tablets are distributed to residents and businesses within the 10-mile emergency planning zone (EPZ) or stockpiled in the vicinity of IP2. (The DPO process provides for the review of concerns raised by individual NRC employees who disagree with a position adopted by the NRC staff.)

In a letter dated April 5, 2000, the Acting Director of the Office of Nuclear Reactor Regulation acknowledged receipt of the Petition of March 14, 2000. In the April 5, 2000, letter, the Petitioners were informed that the request concerning replacement of the IP2 steam generators met the criteria for review under 10 CFR 2.206, but the staff had determined that the

request relating to the resolution of the concerns raised in Dr. Hopenfeld's DPO and GSI-163 and distribution or stockpiling of potassium iodide tablets did not meet the criteria for review under 10 CFR 2.206. The basis for this determination was that they raise generic issues for which the Petitioners had not provided sufficient facts specific to IP2 restart to support their request. However, as a result of information provided at an April 7, 2000, meeting, and a supplement to their Petition dated April 12, 2000, the staff determined that the request that the NRC issue an order to prevent Con Ed from restarting IP2, or modify the license for IP2 to limit it to zero power, until potassium iodide tablets are distributed to people and businesses within the 10-mile EPZ or stockpiled in the vicinity of IP2 met the criteria of 10 CFR 2.206. However, the additional information provided in a supplement dated April 14, 2000, still did not provide plant-specific information necessary to consider Dr. Hopenfeld's DPO under the 2.206 process. The Petitioners were informed of these determinations in a letter dated June 26, 2000. In letters dated June 12, June 29, and July 13, 2000, the Petitioners further supplemented the Petition. In the June 12, 2000, supplement, it was requested that IP2 not be allowed to restart until concerns identified in an internal Federal Emergency Management Agency (FEMA) memorandum dated May 12, 2000, were addressed. In the July 13, 2000, supplement, the Petitioners requested reinstatement of their request that Dr. Hopenfeld's DPO be resolved prior to allowing IP2 to restart. In a letter dated August 31, 2000, the Petitioners were informed that neither of these issues met the criteria for review under 10 CFR 2.206, and indicated the basis for that determination.

In the June 29, 2000, letter, the Petitioners stated that 10 CFR Part 50, Appendix E requires each licensee at each site to conduct a full participation biennial exercise. Since the two nuclear units at the Indian Point site are owned by different licensees, the Petitioners stated that the regulations would require each licensee to conduct a full-participation exercise every 2

years. This issue was accepted for review under 10 CFR 2.206, as stated in a letter dated August 31, 2000.

The Director of the Office of Nuclear Reactor Regulation has addressed the technical concerns provided by the Petitioner. The licensee prepared and submitted to the NRC for staff review an extensive operational assessment. However, since the licensee voluntarily made the decision to replace the IP2 steam generators prior to plant restart, there was no need to complete a review of the ConEd report for the purpose of determining whether the plant could restart and operate with the existing steam generators. Therefore, the intent of this part of the Petition was, in effect, granted. The NRC and Federal Emergency Management Agency have concluded that the onsite and offsite emergency plans for IP2, including the provisions for potassium iodide, provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public in the event of a radiological emergency at the site. Therefore, there is no basis to order the licensee to take additional measures to distribute or stockpile potassium iodide tablets in the vicinity of IP2. Finally, the NRC staff has determined that the full-participation exercise conducted by IP2 on June 24, 1998, met the biennial requirement for both onsite and offsite participation. Therefore, these two requests are not granted. The complete explanation of the staff's conclusions is contained in the "Director's Decision Pursuant to 10 CFR 2.206" (DD-00-04).

The complete text of the Director's Decision is available for public inspection at the Commission's Public Document Room, located at One White Flint North, 11555 Rockville Pike (first floor), Rockville, Maryland, and will be accessible electronically from the agencywide documents access and management system (ADAMS) public library component on the NRC web site, http://www.nrc.gov (the electronic reading room).

A copy of the Decision will be filed with the Secretary of the Commission for the Commission's review in accordance with 10 CFR 2.206(c) of the Commission's regulations. As provided for by this regulation, the Decision will constitute the final action of the Commission 25 days after the date of issuance of the Decision unless the Commission, on its own motion, institutes a review of the Decision within that time.

Dated at Rockville, Maryland, this 6th day of October 2000.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Samuel J. Collins, Director
Office of Nuclear Reactor Regulation

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