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U. S. Nuclear Regulatory Commission ATTN: Document Control Desk Washington, D.C. 20555-0001

SUSQUEHANNA STEAM ELECTRIC STATION EXEMPTION REQUEST FROM THE BIENNIAL EMERGENCY PREPAREDNESS EXERCISE REQUIREMENTS OF 10 CFR 50, APPENDIX E, SECTION IV.F.2.b PLA-6922

Docket Nos. 50-387 and 50-388

Reference: NRC Regulatory Issue Summary 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006.

Pursuant to 10 CFR 50.12, "Specific Exemptions," PPL Susquehanna, LLC (PPL) requests the U.S. Nuclear Regulatory Commission (NRC) approval of an exemption from the requirements of 10 CFR 50, Appendix E, Section IV.F.2.b. Specifically, PPL requests postponement of the evaluation of the onsite elements of the Susquehanna Steam Electric Station's (SSES's) biennial Emergency Preparedness exercise. This exemption request results from special circumstances that were unavoidable due to a necessary unplanned Unit 1 outage. The outage is necessary to address fatigue cracking experienced on the Unit 1 turbine blades.

The Attachment to this letter provides the basis and justification for this exemption request and addresses the exemption requirements of 10 CFR 50.12 and the guidance criteria contained in NRC Regulatory Issue Summary 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements." Note that the offsite portion of the biennial exercise was successfully performed on October 23, 2012.

If you have any questions regarding this exemption request, please contact Mr. John L. Tripoli, Manager, Nuclear Regulatory Affairs, at (570) 542-3100.

This letter contains no new regulatory commitments.

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Senior Vice President - Chief Nuclear Officer

Copy: Mr. S. T. Barr, NRC Region I

Mr. P. W. Finney, NRC Sr. Resident Inspector

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# **Attachment to PLA-6922**

Exemption Request from the Onsite Portion of the Biennial Emergency Preparedness Exercise Requirements – 10 CFR 50, Appendix E, Section IV.F.2.b

## Exemption Request from the Onsite Portion of the Biennial Emergency Preparedness Exercise Requirements – 10 CFR 50, Appendix E, Section IV.F.2.b

### **Purpose**

The following information provides PPL Susquehanna, LLC's (PPL) basis for an exemption from the requirements of 10 CFR 50, Appendix E, Section IV.F.2.b. Specifically, PPL is requesting to reschedule the onsite portion of the Susquehanna Steam Electric Station (SSES) biennial Emergency Preparedness (EP) exercise from October 23, 2012, to February 26, 2013. The offsite portions of the SSES biennial EP exercise were performed on October 23, 2012. This exemption request results from special circumstances that were unavoidable due to a necessary unplanned Unit 1 outage. The outage is necessary to address fatigue cracking experienced on the Unit 1 turbine blades. This request for exemption is consistent with the guidance specified in Nuclear Regulatory Commission (NRC) Regulatory Issue Summary (RIS) 2006-03, "Guidance on Requesting an Exemption from Biennial Emergency Preparedness Exercise Requirements," dated February 24, 2006.

#### **Special Circumstances**

The PPL full participation and FEMA evaluated biennial exercise was scheduled to be conducted on October 23, 2012. On October 3, 2012, PPL received a recommendation from its low pressure (LP) turbine (non-safety related equipment) supplier to remove the Unit 1 Main Turbine from service to perform LP turbine end blade root inspections. PPL reduced power to reduce blade tip vibration on both Unit 1 and Unit 2. Unit 1 was removed from service on October 20, 2012. Pending the outcome of the Unit 1 turbine inspection, PPL will determine whether a similar inspection of the Unit 2 turbine is warranted.

The Unit 1 shutdown will affect a significant number of employees who will then not be available to support the drill. PPL had planned to deploy approximately 115 players and controllers to conduct the exercise. This includes an operating shift as well as several key managers. During an outage, these individuals are deployed on different shifts and typically are covering 12-hour periods staffing our Outage Control Center and other outage functions 24 hours a day. October 23 was the fourth day of the Unit 1 outage. In addition, SSES Unit 2 is still in operation.

NRC RIS 2006-03 states that to accommodate the scheduling of exercises, the NRC has allowed licensees the flexibility to schedule their exercises at any time during the biennial calendar year. The RIS provides a 13 to 35 month window to schedule exercises while still meeting the biennial requirement. A one-time change in the exercise schedule

increases the interval between biennial exercises, but in most cases the postponed exercise still falls within the 35 month window thus meeting the intent of the regulation cited in the RIS. Since 1997, PPL has performed its biennial EP exercise in the fall. The exercises were all scheduled in October except one exercise was in September and one was in November. This selected timeframe is coordinated during scheduling conferences that take into consideration the scheduling of other EP exercises in Region I. PPL also has annual refueling outages that are scheduled in the spring. PPL's request to reschedule the onsite portion of the exercise results in 28 months between biennial exercises, which is still within the RIS guidance of 13 to 35 months.

This request for an exemption provides only temporary relief since the onsite portion of the exercise will be performed on February 26, 2013. PPL made a good faith effort to comply with the regulation. An extensive amount of planning was performed, a challenging scenario was developed, and required submission dates for exercise scenarios were met. Although the conduct of an exercise or drill and associated critiques involves only a limited amount of time, it would be an undue burden during this period of time to manage this activity during the course of an outage. From a risk perspective, PPL believes it is less risk to public health and safety to reschedule the onsite portion of the exercise to February 26, 2013. The offsite portion of the biennial exercise was successfully performed on October 23, 2012.

PPL believes the requested approach represents safe and conservative actions to perform these unexpected turbine inspection outages.

## Justification for the Exemption

In accordance with 10 CFR 50.12(a)(1), the NRC may grant exemptions from certain requirements of the 10 CFR 50 regulations that are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the common defense and security.

## 1. This exemption request is authorized by law:

The proposed exemption will allow PPL to reschedule the onsite portion of the biennial EP exercise from October 23, 2012, to February 26, 2013. This is necessary due to an unplanned Unit 1 outage to address the fatigue cracking experienced on the Unit 1 turbine blades, and a potential shutdown of Unit 2.

In accordance with 10 CFR 50.12, the NRC may grant an exemption from the requirements of 10 CFR 50 if the exemption is authorized by law. The proposed exemption is authorized by law in that no other prohibition of law exists to preclude the activities which would be authorized by the exemption. The proposed exemption will continue to serve the underlying purpose of the regulation. The purposes of the

biennial EP exercise are to test the adequacy of the emergency plans, to ensure the emergency response organization personnel are familiar with their duties, and to identify and correct weaknesses. The activities performed during SSES's periodic drills, ongoing training, and response to plant or external events demonstrate that these underlying purposes of conducting an exercise have been met.

# 2. This exemption request will not present an undue risk to public health and safety:

Adequate emergency response capabilities have been maintained and demonstrated since the last SSES full participation biennial exercise (date October 5, 2010), through the conduct of drills, ongoing training, and response to plant or external events.

#### **Exercises and Drills**

The previous full participation biennial exercise of the SSES emergency plan was performed on October 5, 2010. The results of this exercise concluded that the overall performance of the emergency response organization demonstrated that onsite emergency plans are adequate and that the organization is capable of implementing these plans. The NRC evaluated the 2010 biennial emergency plan exercise and provided the evaluation results in NRC Inspection Report 05000387/2010502 and 0500388/2010502, dated November 16, 2010 (ML103200304). No NRC findings were identified.

Table 1 provides a list of the seven full-scale drills performed since the 2010 SSES full participation biennial EP exercise. These drills included activation of all of the licensee's emergency response facilities, and participation by the State of Pennsylvania and local agencies. The full-scale drills exercise the functions of SSES's emergency response organization to respond to an emergency scenario involving radiological release and coordination of actions to mitigate the event. This includes the control room/simulator, Technical Support Center (TSC), Operations Support Center (OSC), Emergency Operating Facility (EOF), and the Joint Information Center (JIC). Coordination of actions and communications are practiced between these facilities and the State of Pennsylvania and risk county emergency management agencies to promote a high level of performance.

NRC RIS 2006-03 states the licensee shall take actions necessary to ensure that adequate emergency response capabilities are maintained during the interval between biennial exercises by conducting drills, including at least one drill involving a combination of some of the principal functional areas of the licensee's onsite emergency response capabilities. The number of drills listed in Table 1 exceeds the one drill recommendation in NRC RIS 2006-03 and demonstrates PPL's continuing level of

engagement in EP activities by SSES, the State of Pennsylvania and risk county agencies.

**Table 1 - Completed Full Scale Drills 2010-2012** 

Date
11/16/2010
6/28/2011
8/23/2011
9/13/2011
11/01/2011
2/07/2012
8/28/2012

PPL also conducted evaluated Licensed Operator Scenarios and individual facility Table Top drills (see Table 2 below) to ensure that key personnel maintain an understanding and focus on Emergency Plan initiating conditions. These drills also involved Performance Indicator (PI) activities.

Table 2 – Evaluated Licensed Operator Scenarios and Individual Facility Table Top Drills 2010-2012

Date	Type of Drill	
5/23/2011	Licensed Operator Scenarios	
5/27/2011	Control Room Simulator Table Top	
5/30/2011	Licensed Operator Scenarios	
5/31/2011	Licensed Operator Scenarios	
6/20/2011	Licensed Operator Scenarios	
6/24/2011	Control Room Simulator Table Top	
6/27/2011	Licensed Operator Scenarios	
2/17/2012	Control Room Simulator Table Top	
3/02/2012	Control Room Simulator Table Top	
3/09/2012	Control Room Simulator Table Top	
3/19/2012	Control Room Simulator Table Top	
3/20/2012	Technical Support Center (TSC) Table Top	
5/18/2012	Emergency Operations Facility (EOF) Table Top	
6/18/2012	Licensed Operator Scenarios	
6/25/2012	Licensed Operator Scenarios	
7/3/2012	Control Room Simulator Table Top	
7/9/2012	Licensed Operator Scenarios	
7/16/2012	Licensed Operator Scenarios	
7/17/2012	Licensed Operator Scenarios	

7/23/2012	Licensed Operator Scenarios	
7/27/2012	Control Room Simulator Table Top	
8/3/2012	Control Room Simulator Table Top	
8/17/2012 Control Room Simulator Table Top		
8/24/2012	Control Room Simulator Table Top	

PPL also conducted practice drills (see Table 3 below) to maintain proficiency of SSES's Emergency Response Organization. The TSC, EOF, OSC, and JIC participated. SSES's practice drills exercise similar activities, except simulated data is provided in lieu of use of the simulator.

Table 3 - Practice Drills 2010-2012

Date	1 <sub>1</sub>
11/2/2010	
1/11/2011	
6/16/2011	
8/09/2011	
8/30/2011	
10/18/2011	
1/17/2012	
7/13/2012	
7/20/2012	
7/27/2012	
8/03/2012	
8/14/2012	
10/9/2012	

#### **Actual Events**

On August 23, 2011, an actual emergency event was declared due to an earthquake. PPL declared an unusual event and the TSC was staffed for approximately 16 hours. In addition, during Tropical Storm Lee (September 2011), there was wide spread flooding in SSES EPZ risk counties adjacent to the plant and SSES emergency planning personnel assisted with the county response but no emergency plan entry was required for SSES.

#### Planned Drills for the Remainder of 2012

A Health Physics EP drill is tentatively scheduled for November 13, 2012. The date of this drill may change based on completion of the Unit 1 turbine outage and possible inspection of the Unit 2 turbine blades.

## **Training**

In addition to the above drills and exercises performed since the SSES 2010 biennial exercise, the following training has been completed with the onsite functions of the SSES Emergency Response Organization (see Table 4 below)

Table 4 – EP Training Completed with SSES Onsite Functions 2010-2012

Course		
Number	Course Name	Date
EP009	Dose Calculator Training	7/26/2012
EP009R	Dose Calculator Training	9/15/2011
EP009R	Dose Calculator Training	9/21/2011
EP009R	Dose Calculator Training	9/22/2011
EP009R	Dose Calculator Training	12/15/2011
EP009R	Dose Calculator Training	7/25/2012
EP009R	Dose Calculator Training	8/1/2012
EP009R	Dose Calculator Training	8/9/2012
EP009R	Dose Calculator Training	8/15/2012
EP009R	Dose Calculator Training	8/22/2012
EP009R	Dose Calculator Training	8/29/2012
EP009R	Dose Calculator Training	9/11/2012
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	1/4/2011
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	7/14/2011
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	8/27/2011
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	10/6/2011
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	3/15/2012
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	3/21/2012
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	8/29/2012
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	9/25/2012
	Dose Assessment & Protective Actions Training /	
EP010	Retraining	9/28/2012
EP012	Emergency Classification Training / Retraining	1/4/2011
EP012	Emergency Classification Training / Retraining	7/14/2011
EP012	Emergency Classification Training / Retraining	8/27/2011

EP012	Emergency Classification Training / Retraining	10/7/2011
EP012	Emergency Classification Training / Retraining	3/22/2012
EP013	Onsite Radiation Monitoring Team	9/21/2011
EP013	Onsite Radiation Monitoring Team	7/17/2012
EP013	Onsite Radiation Monitoring Team	8/1/2012
EP013	Onsite Radiation Monitoring Team	8/9/2012
EP013R	Onsite Radiation Monitoring Team	8/25/2011
EP013R	Onsite Radiation Monitoring Team	9/15/2011
EP013R	Onsite Radiation Monitoring Team	9/29/2011
EP013R	Onsite Radiation Monitoring Team	7/25/2012
EP013R	Onsite Radiation Monitoring Team	8/1/2012
EP013R	Onsite Radiation Monitoring Team	8/29/2012
EP013R	Onsite Radiation Monitoring Team	9/11/2012
EP017	Introduction to Radiation	10/21/2010
EP017	Introduction to Radiation	11/30/2010
EP017	Introduction to Radiation	12/9/2010
EP017	Introduction to Radiation	12/10/2010
EP017	Introduction to Radiation	2/11/2011
EP017	Introduction to Radiation	2/15/2011
EP017	Introduction to Radiation	2/18/2011
EP017	Introduction to Radiation	2/23/2011
EP017	Introduction to Radiation	3/4/2011
EP017	Introduction to Radiation	1/20/2012
EP017	Introduction to Radiation	1/31/2012
EP017	Introduction to Radiation	2/8/2012
EP017	Introduction to Radiation	5/30/2012
EP017	Introduction to Radiation	6/22/2012
EP018	Plant Operator / Tour	10/22/2010
EP018	Plant Operator / Tour	5/30/2012
EP018	Plant Operator / Tour	6/22/2012
EP021	Contaminated Injury - Ambulance	1/24/2011
EP021	Contaminated Injury - Ambulance	10/5/2011
EP021	Contaminated Injury - Ambulance	10/18/2011
EP021	Contaminated Injury - Ambulance	10/22/2011
EP021	Contaminated Injury - Ambulance	11/3/2011
EP021	Contaminated Injury - Ambulance	11/4/2011
EP021	Contaminated Injury - Ambulance	11/11/2011
EP021	Contaminated Injury - Ambulance	12/13/2011
EP021	Contaminated Injury - Ambulance	1/6/2012
EP021	Contaminated Injury - Ambulance	1/16/2012
EP021	Contaminated Injury - Ambulance	2/29/2012
EP021	Contaminated Injury - Ambulance	3/30/2012

EP021	Contaminated Injury - Ambulance	5/2/2012
EP022	Contaminated Injury -Hospital Training /Retraining	9/22/2011
EP022	Contaminated Injury -Hospital Training /Retraining	7/24/2012
EP022	Contaminated Injury -Hospital Training /Retraining	8/8/2012
EP022R	Contaminated Injury -Hospital Training /Retraining	8/17/2011
EP022R	Contaminated Injury -Hospital Training /Retraining	8/24/2011
EP022R	Contaminated Injury -Hospital Training /Retraining	7/31/2012
EP022R	Contaminated Injury -Hospital Training /Retraining	8/16/2012
EP022R	Contaminated Injury -Hospital Training /Retraining	8/30/2012
EP024	Post Accident Coolant Sample	8/24/2011
EP025	Post Accident Vent Monitoring Sample	8/26/2011
EP025R	Post Accident Vent Monitoring Sample	2/3/2011
EP025R	Post Accident Vent Monitoring Sample	3/15/2011
EP025R-11	Post Accident Vent Monitoring Sample	2/3/2011
EP025R-11	Post Accident Vent Monitoring Sample	2/9/2011
EP025R-11	Post Accident Vent Monitoring Sample	2/16/2011
EP025R-11	Post Accident Vent Monitoring Sample	2/23/2011
EP025R-11	Post Accident Vent Monitoring Sample	3/15/2011
EP053	Offsite Team Management	2/15/2011
EP053	Offsite Team Management	6/21/2011
EP053	Offsite Team Management	2/23/2012
EP053	Offsite Team Management	3/7/2012
EP054-11	In-Plant Team Management Training / Retraining	2/4/2011
EP054-11	In-Plant Team Management Training / Retraining	2/10/2011
EP054-11	In-Plant Team Management Training / Retraining	2/17/2011
EP054-11	In-Plant Team Management Training / Retraining	2/24/2011
EP054-11	In-Plant Team Management Training / Retraining	3/18/2011
EP054I	In-Plant Team Management Training / Retraining	11/18/2010
EP054I	In-Plant Team Management Training / Retraining	3/16/2012
EP054R	In-Plant Team Management Training / Retraining	1/13/2011
EP054R	In-Plant Team Management Training / Retraining	2/1/2011
EP054R	In-Plant Team Management Training / Retraining	2/4/2011
EP054R	In-Plant Team Management Training / Retraining	3/18/2011
EP054R	In-Plant Team Management Training / Retraining	5/18/2011
EP054R	In-Plant Team Management Training / Retraining	5/31/2011
EP054R	In-Plant Team Management Training / Retraining	6/6/2011
EP054R	In-Plant Team Management Training / Retraining	7/8/2011
EP054R	In-Plant Team Management Training / Retraining	7/11/2011
EP054R	In-Plant Team Management Training / Retraining	8/17/2011
EP054R	In-Plant Team Management Training / Retraining	12/20/2011
EP054R	In-Plant Team Management Training / Retraining	12/28/2011
EP054R	In-Plant Team Management Training / Retraining	7/31/2012

EP054R	In-Plant Team Management Training / Retraining	8/16/2012
EP062	Near Site Monitoring Training / Retraining	7/12/2012
EP062	Near Site Monitoring Training / Retraining	7/31/2012
EP062E	Near Site Monitoring Training / Retraining	2/8/2011
EP062E	Near Site Monitoring Training / Retraining	6/13/2011
EP062E	Near Site Monitoring Training / Retraining	7/12/2012
EP062E	Near Site Monitoring Training / Retraining	10/2/2012
EP062R	Near Site Monitoring Training / Retraining	5/17/2011
EP077	Severe Accident Progression and Phenomena	7/14/2011
EP077	Severe Accident Progression and Phenomena	10/28/2011
EP077	Severe Accident Progression and Phenomena	4/2/2012
EP078	Damage Support Procedures	10/15/2010
EP078	Damage Support Procedures	11/9/2011
EP078	Damage Support Procedures	2/17/2012
EP078	Damage Support Procedures	3/2/2012
EP078	Damage Support Procedures	3/9/2012
EP078	Damage Support Procedures	3/16/2012
EP078	Damage Support Procedures	3/20/2012
EP078E	Damage Support Procedures	11/9/2011
EP078E	Damage Support Procedures	11/30/2011
EP078E	Damage Support Procedures	2/17/2012
EP078E	Damage Support Procedures	3/16/2012
EP078E	Damage Support Procedures	3/20/2012
EP085	Understanding Your Role in the Emergency Plan	8/17/2011
EP085	Understanding Your Role in the Emergency Plan	4/16/2012
EP085	Understanding Your Role in the Emergency Plan	5/23/2012
EP086	Team Training	1/4/2011
EP086	Team Training	1/28/2011
EP086	Team Training	2/17/2011
EP086	Team Training	3/29/2011
EP086	Team Training	4/4/2011
EP086	Team Training	7/14/2011
EP086	Team Training	8/4/2011
EP086	Team Training	8/19/2011
EP086	Team Training	9/16/2011
EP086	Team Training	9/23/2011
EP086	Team Training	10/7/2011
EP086	Team Training	10/14/2011
EP086	Team Training	10/20/2011
EP086	Team Training	10/21/2011
EP086	Team Training	11/11/2011
EP086	Team Training	11/15/2011

EP086	Team Training	12/9/2011
EP086	Team Training	12/10/2011
EP086	Team Training	12/22/2011
EP086	Team Training	1/7/2012
EP086	Team Training	1/25/2012
EP086	Team Training	8/30/2012
EP086	Team Training	9/6/2012
EP086	Team Training	9/27/2012
EP086	Team Training	10/8/2012
EP086	Team Training	10/12/2012
EP087	Computer Practices - MIDAS	12/7/2010
EP087	Computer Practices - MIDAS	2/15/2011
EP087	Computer Practices - MIDAS	3/8/2011
EP087	Computer Practices - MIDAS	3/15/2011
EP087	Computer Practices - MIDAS	11/3/2011
EP087	Computer Practices - MIDAS	11/8/2011
EP087	Computer Practices - MIDAS	11/15/2011
EP087	Computer Practices - MIDAS	12/7/2011
EP087	Computer Practices - MIDAS	12/14/2011
EP087	Computer Practices - MIDAS	12/15/2011
EP091	Overview – Emergency Classifications	1/25/2011
EP091	Overview – Emergency Classifications	4/5/2011
EP091	Overview – Emergency Classifications	5/10/2012
EP092	Environmental Sampling Team Training	10/21/2010
EP092	Environmental Sampling Team Training	10/13/2011
EP092	Environmental Sampling Team Training	10/16/2012
EP098	PASS Training for Chemistry Coordinators	5/31/2012
EP098	PASS Training for Chemistry Coordinators	6/7/2012
EP099	PASS Training for Chemistry Coordinators	5/31/2012
EP099	PASS Training for Chemistry Coordinators	6/7/2012
EP101	EP-AD-028 NEP Staff Annual Training	6/17/2011
EP101	EP-AD-028 NEP Staff Annual Training	12/19/2011
EP101	EP-AD-028 NEP Staff Annual Training	1/27/2012
EP101	EP-AD-028 NEP Staff Annual Training	1/30/2012
EP101	EP-AD-028 NEP Staff Annual Training	2/14/2012
EP104	Operations Response to Terrorism	10/22/2010
EP104	Operations Response to Terrorism	11/22/2010
EP104	Operations Response to Terrorism	9/16/2011
EP104	Operations Response to Terrorism	10/10/2011
EP104	Operations Response to Terrorism	9/18/2012
EP104	Operations Response to Terrorism	9/25/2012
EP104	Operations Response to Terrorism	10/3/2012

EP104	Operations Response to Terrorism	10/4/2012
EP104	Operations Response to Terrorism	10/9/2012

Table 5 - EP Courses Scheduled for the Onsite SSES Emergency Response Personnel from October 25, 2012 thru February 26, 2013

Course	e július exercisa (p. 1).	
Number	Course Name	Date
EP087	Computer Practices - MIDAS	10/25/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	10/25/2012
	Dose Assessment Protective Actions Training	
EP010	/ Retraining	10/26/2012
EP087	Computer Practices - MIDAS	10/30/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	10/30/2012
EP087	Computer Practices - MIDAS	10/31/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	10/31/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/1/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/2/2012
EP087	Computer Practices - MIDAS	11/5/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/5/2012
EP087	Computer Practices - MIDAS	11/6/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/6/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/7/2012
EP024R	Post Accident Coolant Sample	11/7/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/8/2012
EP024R	Post Accident Coolant Sample	11/8/2012
EP087	Computer Practices - MIDAS	11/13/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/13/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/14/2012
EP024R	Post Accident Coolant Sample	11/14/2012
EP087	Computer Practices - MIDAS	11/15/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/15/2012
EP024R	Post Accident Coolant Sample	11/15/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/16/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	11/20/2012
EP087	Computer Practices - MIDAS	12/4/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	12/4/2012
EP087	Computer Practices - MIDAS	12/6/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	12/6/2012
EP087	Computer Practices - MIDAS	12/11/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	12/11/2012

EP024R	Post Accident Coolant Sample	12/12/2012
EP087	Computer Practices - MIDAS	12/13/2012
EP009R	HP Level II & TSC Dose Calculator Retraining	12/13/2012
EP024R	Post Accident Coolant Sample	12/13/2012
EP024R	Post Accident Coolant Sample	12/14/2012
	Overview – Dose Assessment and Protective	
EP090	Actions	2/26/2013

Table 6 provides a list of training that was provided to municipalities located within the 10-mile Emergency Planning Zone (EPZ). The training focused on radiological emergencies within the EPZ as required by NRC NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants."

Table 6 - Offsite Municipality EP Training

Date	Municipal Training
5/8/2012	Union Township
5/14/2012	Slocum Township
5/17/2012	Conyngham Township
5/31/2012	Beaver Township
6/6/2012	Fishing Creek Township
6/6/2012	Newport Township
6/19/2012	Sugarloaf Township
6/21/2012	Hunlock Creek Township
7/11/2012	North Centre Township
7/17/2012	Dorrance Township
8/13/2012	Butler/Conyngham Borough
8/13/2012	Nanticoke Township
8/15/2012	South Centre Township
8/16/2012	Berwick/Briar Creek Borough
8/20/2012	Salem Township
8/21/2012	Nescopeck Township
8/22/2012	Shickshinny Township
8/23/2012	Black Creek Township
8/27/2012	Mifflinville Township
9/4/2012	Briar Creek Township
10/9/2012	Hollenback Township
10/10/2012	Nescopeck Borough
10/10/2012	Nuangola Borough

Table 7 provides a list of training provided to the offsite emergency responders from the risk and support counties. The training focused on county radiological response teams and county radiation officers.

Table 7 - Offsite County Emergency Responder Training

Date(s)	County Training
1/13/2012,	Columbia County Radiological Response
1/20/2012	Team
2/3/2012,	Columbia County Initial Radiation Officer
2/10/2012	
2/8/2012	SCI Retreat Radiological Response Team
3/15/2012,	Northumberland County Radiological
3/22/2012	Response Team
4/11/2012	Lycoming County Radiological Response Team
4/19/2012	Schuylkill County Pottsville Radiological
	Response Team
5/9/2012	Lycoming County Radiation Officer
4/26/2012,	Schuylkill County Mahoney City Radiological
5/17/2012	Response Team
5/15/2012	Schuylkill County Pottsville Radiation Officer
5/21/2012	Mifflinville Radiological Response Team
7/10/2012,	Sweet Valley Luzerne County Radiological
7/17/2012,	Response Team
7/24/2012	
8/26/2012	Union County Tabletop Exercise
10/11/2012	Lackawanna County Tabletop Exercise
10/17/2012,	Wyoming County Radiological Response
10/18/2012	Team

Table 8 lists additional training provided to the offsite emergency responders from the risk and support counties. The training focused on county radiological response teams and county radiation officers.

Table 8 – Miscellaneous Training for Offsite Emergency Responders

Date	Miscellaneous Training
March 2011	Municipal Offsite – Training / Conference (All Municipalities)
7/21/2011	Annual Government training for the support counties, risk counties, PEMA, FEMA, Red Cross, Department of Health and the Pennsylvania Department of Environmental Protection - Bureau of Radiation Protection
6/6/2012	Berwick Hospital Training
6/12/2012	Ambulance Training
6/14/2012	Geisinger Medical Center Training
7/26/2012	Annual Government training for the support counties, risk counties, PEMA, FEMA, Red Cross, Department of Health and the Pennsylvania Department of Environmental Protection - Bureau of Radiation Protection
9/6/2012	Municipal Radiological Training
9/12/2012	Municipal Practice Drill (South Centre did not participate)

### 3. This exemption request is consistent with the common defense and security:

The common defense and security are not affected by this exemption request.

This exemption requests NRC approval to extend the schedule for performing the onsite portion of the exercise until February 26, 2013 as a result of an unplanned, yet necessary Unit 1 outage. The onsite functions of SSES's emergency organization have been evaluated since the 2010 full participation biennial exercise.

Granting this exemption will maintain focus on nuclear safety and security; therefore, it is in the interest of common defense and security. Pursuant to 10 CFR 50.12(a)(2), the NRC will consider granting an exemption from the regulation if special circumstances are present. This exemption request meets this requirement since special circumstances are present.

Additionally, the exemption would provide only temporary relief from the 10 CFR 50, Appendix E, Section IV.F.2.b requirements. The rescheduled onsite portion will be evaluated on February 26, 2013. All other functions will be performed and evaluated during the originally scheduled exercise on October 23, 2012.

#### **Environmental Assessment**

Granting this exemption request will allow the onsite portion of the SSES biennial EP exercise to be conducted on February 26, 2013. Although the onsite functions were previously scheduled to be performed on October 23, 2012, this schedule change would have no impact on the environment since any outdoor activity during the exercise is limited to minimal use of roads and highways. The proposed action would not significantly increase the probability or consequences of an accident, change the types or quantities of radiological effluents that may be released offsite, or result in a significant increase in public or occupational radiation exposure, since there would be no change to facility operations that could create a new accident or affect a previously analyzed accident or release path.

Since the proposed action would not have any adverse environmental effects, there are no alternatives available for reducing or avoiding adverse environmental effects. With regard to non-radiological impacts, no changes would be made to non-radiological plant effluents or activities that would adversely affect the environment. Therefore, no significant non-radiological impacts would be associated with the proposed action.

There are no federal permits, licenses, approvals or other entitlements which must be obtained in connection with the proposed action. The proposed action is not subject to any environmental quality standards or requirements imposed by federal, state, regional, or local agencies having responsibility for environmental protection.

#### Conclusion

Based on the above information, PPL requests a one-time exemption from the requirements of 10 CFR 50 Appendix E, Section IV.F.2.b, to reschedule the onsite portion of the biennial SSES EP exercise until February 26, 2013. This requested exemption is authorized by law, will not present an undue risk to the public health and safety, is consistent with the common defense and security, and special circumstances are present as described in 10 CFR 50.12(a)(2).