

June 26, 1985  
(NMP2L 0432)

Mr. Walter Butler, Chief  
Licensing Branch No. 2  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Butler:

Re: Nine Mile Point Unit 2  
Docket No. 50-410

This letter confirms several discussions with members of the NRC staff regarding our plan for an exercise of the Nine Mile Point site Emergency Plan for Nine Mile Point Unit 2. As discussed below, we believe our plan meets all regulatory requirements and leads to efficient utilization of the resources of all involved organizations.

As you are aware, Units 1 and 2 are both Boiling Water Reactors and are in close physical proximity. Both the plume and ingestion exposure emergency planning zones for the facilities are identical. Moreover, the state of New York and Oswego County use a single plan for the site. Niagara Mohawk proposes to treat the two facilities as one site for emergency preparedness purposes as discussed in our site emergency plan. We understand that this treatment is similar to that previously approved at other multi-unit sites.

Full Participation joint NRC/FEMA observed exercises have been previously conducted at the site for Unit 1 in 1981 and 1983. In November, 1985, a full participation joint NRC/FEMA observed exercise will be conducted in accordance with 10CFR 50, Appendix E, to test the preparedness of offsite Radiological Emergency Plans and procedures to support the continued operation of Unit 1 and the initial licensing of Unit 2. This exercise will fulfill Niagara Mohawk's annual and biennial exercise requirements for the site. Thus, another full participation exercise for the Unit 1 and 2 site is not required prior to full power operation of Unit 2. We have discussed this matter with the NRC headquarters and Region I emergency preparedness staffs who have concurred in this assessment.

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We should also like to note that our offsite Radiological Emergency Plans have been previously submitted and formally accepted by FEMA. Additionally, our public notification and alerting system has also undergone formal FEMA review and acceptance. Therefore, there are no required FEMA submissions or approvals required prior to the issuance of a full-power license for Unit 2.

As shown on Attachment 1, the Unit 1 and 2 Emergency preparedness facilities, equipment, and personnel are essentially identical except for actions originating in the Unit 2 Control Room. Since these areas will be fully tested during the operator licensing program, we expect their impact on Emergency Preparedness activities to be very minimal. Therefore, Niagara Mohawk proposes that an exercise involving the Unit 2 station be held on or about our normal site exercise anniversary date of September, 1986. This date is tentative pending coordination with NRC Region I, New York State and Oswego County officials. In the interim we propose to integrate Unit 2 into our Emergency preparedness activities schedule and to conduct training drills.

We request that you provide a formal confirmation that these proposed activities meet the Emergency Preparedness requirements. We are prepared to meet with your staff, if necessary, to discuss this in more detail.

Very truly yours,



C. V. Mangan  
Vice President

Nuclear Engineering & Licensing

CVM/jg

Attachment

xc: USNRC Licensing Project Manager, M. Haughey ✓  
USNRC Senior Resident Inspector, R. Gramm

T. Harpster  
USNRC Region I



ATTACHMENT

I Organization

Comparison

Control Room Staff

Unit Specific as per  
Technical Specifications  
(Note: Majority of Unit II  
personnel licensed and  
trained on Unit I)

Technical Support Center Staff

Same except for some  
Engineering Support

Operational Support Center Staff

Same

Emergency Operations Facility Staff

Same except for some  
Engineering Support

Joint News Center Staff

Same

Corporate Headquarter Staff

Same except for some  
Engineering Support

II Training

Operations Staff

Same except for Unit Specific  
details (Note: Majority of  
Unit II personnel licensed  
and trained on Unit I)

Directors or Coordinators

Same

Accident Assessment Personnel

Same except for some  
Engineering Support

Radiological Monitoring and  
Analysis Personnel (onsite)

Unit Specific with a common  
manpower pool

Radiological Monitoring and  
Analysis Personnel (offsite)

Same

Security

Same

Repair and Damage Control

Same

First Aid and Rescue

Same

Licensee's Headquarter Support

Same except for Unit  
Engineering Specific



### III Emergency Plans and Procedures

Emergency Plan	Same
Emergency Plan Implementing Procedures	Same
Emergency Operating Procedures	Unit Specific

### IV Emergency Facilities

Control Room	Unit Specific
TSC	Same
OSC	Same
EOF	Same
JNC	Same
Corporate EOC	Same

### V Emergency Communications

Telephone	Same
Radio	Same
Public Address	Same
Facsimile	Same

### VI Emergency Equipment

Radiological Survey equipment (Portable)	Same
Post Accident Sampling System	Unit Specific, but identical equipment and vendor
Gaseous Effluent Monitoring System	Unit Specific, but similar equipment and vendor
Area Radiological Monitoring System	Unit Specific
Meteorological System	Same
Emergency Dose Assessment System	Same

