



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,

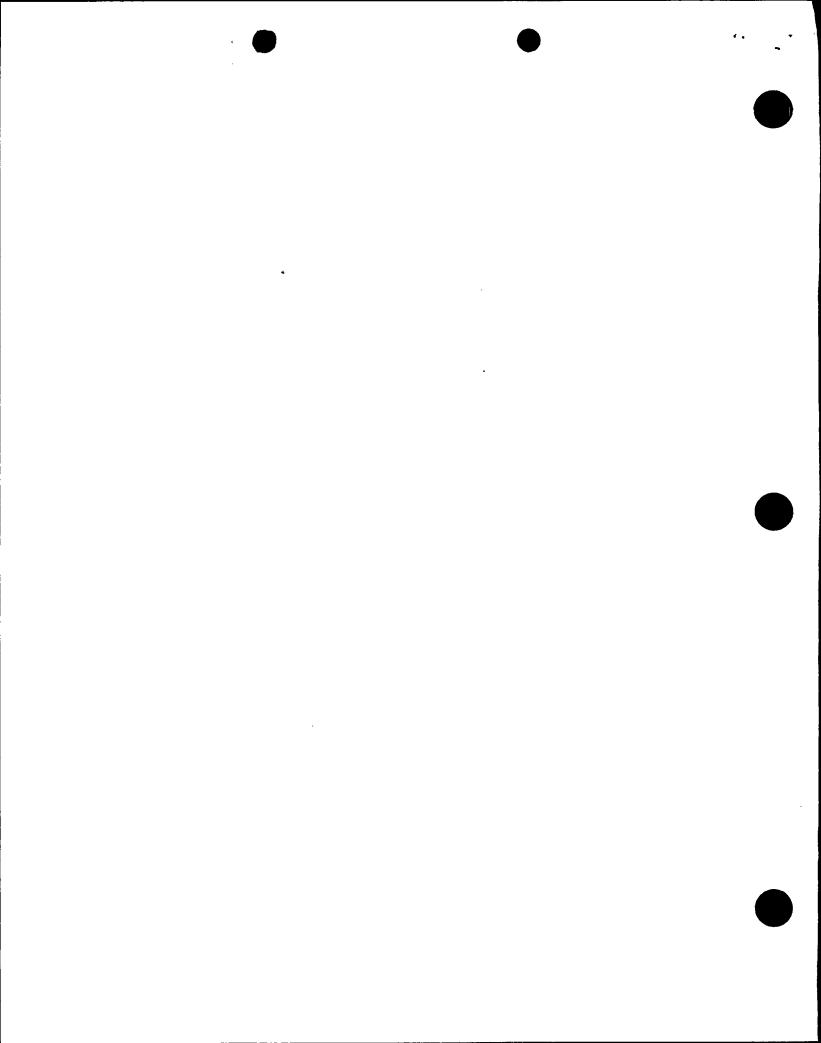
C. V. Mangan Vice President Nuclear Engineering & Licensing

CVM/jg

Attachment

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

T. Harpster USNRC Region I



ATTACHMENT

I Organization

Control Room Staff

Technical Support Center Staff

Operational Support Center Staff

Emergency Operations Facility Staff

Joint News Center Staff

Corporate Headquarter Staff

II Training

Operations Staff

Directors or Coordinators

Accident Assessment Personnel

Radiological Monitoring and Analysis Personnel (onsite)

Radiological Monitoring and Analysis Personnel (offsite)

Security

Repair and Damage Control

First Aid and Rescue

Licensee's Headquarter Support

Comparison

Unit Specific as per Technical Specifications (Note: Majority of Unit II personnel licensed and

trained on Unit I)

Same except for some

Engineering Support

Same

Same except for some

Engineering Support

Same

Same except for some

Engineering Support

Same except for Unit Specific

details (Note: Majority of Unit II personnel licensed

and trained on Unit I)

Same

Same except for some

Engineering Support

Unit Specific with a common

manpower pool

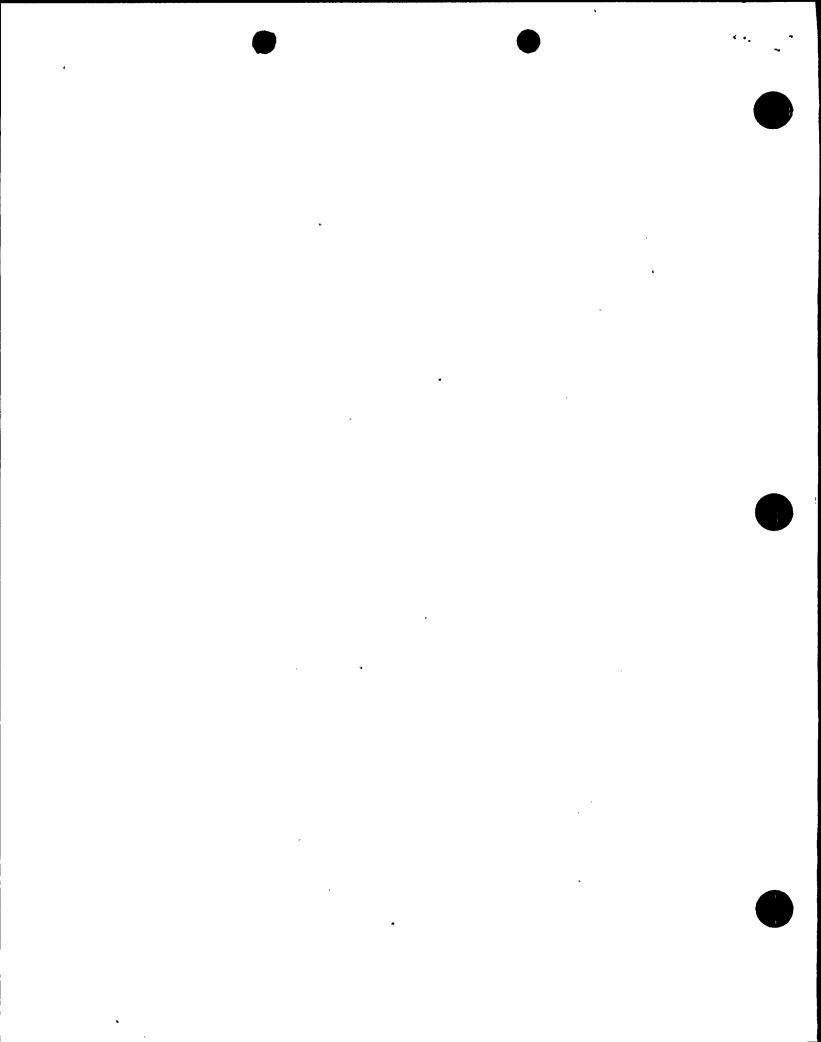
Same

Same

Same

Same

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 <u>Emergency Facilities</u>

Control Room Unit Specific

TSC Same

OSC Same

EOF Same

JNC Same

Corporate EOC Same

V <u>Emergency Communications</u>

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

Meterological System Same

Emergency Dose Assessment System Same

