



FEMA

May 8, 2019

Mr. Joseph Anderson
Operating Reactors Licensing Outreach Branch
Division of Preparedness and Response
Office of the Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

SUBJECT: LICENSE AMENDMENT REQUEST – PROPOSED CHANGES TO THE DAVIS BESSE NUCLEAR POWER STATION EMERGENCY PLAN FOR PERMANENTLY DEFUELED CONDITION

REFERENCE: Letter from the Nuclear Regulatory Commission dated March 7, 2019

Dear Mr. Anderson:

The FEMA Radiological Emergency Preparedness (REP) Program received your letter dated March 7, 2019, requesting FEMA's review of the proposed licensee staffing changes, against the current FEMA approved state and local REP Plans regarding Davis Besse Nuclear Power Station (DBNPS) Emergency Plans.

By letter dated April 25, 2018 (Agency Wide Documents Access and Management (ADAMS) Accession No. ML18115A007), First Energy Nuclear Operating Company (FENOC) submitted for U.S. Nuclear Regulatory Commission approval, a license amendment request (LAR) to the Radiological Emergency Plan (Emergency Plan) for DBNPS.

The proposed changes to DBNPS Emergency Plan would eliminate specific on-shift and augmented emergency response organization (ERO) positions based on written certification to the NRC under 50.82(a)(1) to Title 10 of the Code of Federal Regulations (10 CFR) of the permanent cessation of reactor operation and transfer of spent fuel from the reactor vessel. The proposed on-shift and ERO staffing changes are commensurate with the reduced spectrum of credible accidents from an operating power reactor and must continue to meet the standards of 10 CFR 50.47, "Emergency Plans", and the requirements of Appendix E to 10 CFR Part 50, "Emergency Planning and Preparedness of Production and Utilization Facilities".

The FEMA REP Regional and Headquarters staff reviewed the proposed licensee staffing changes to the DBNPS Emergency Plans and identified no potential adverse impacts that would preclude the effective implementation of the existing FEMA-approved State of Ohio Emergency Management Agency, Ottawa County Emergency Management Agency, and the Lucas County Emergency Management Agency

radiological emergency response plans and procedures or impact FEMA's finding of reasonable assurance for DBNPS.

The Ohio Offsite Response Organizations (ORO)'s only concern is the post shut down plan does not give a clear indication of the end date of the plan. FEMA must ensure that the decommissioning plan is not put into effect too early when the risk could impact the health and safety of the public. Once the decommissioning plan takes effect, the resources of the ORO's will start to diminish.

If you have any questions or concerns, please contact me at 202-646-2849.

Sincerely,

CRAIG J FIORE

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Date: 2019.05.08 09:59:35 -08'00'

Vanessa E. Quinn
Chief

Radiological Emergency Preparedness Branch