

From: [Anderson, Joseph](#)
To: [Fiore, Craig](#)
Cc: [Quinn, Vanessa](#); [Harris III, Timothy](#); [THD-Action-Office](#); [Casey, Michael](#); [Hart, Michelle](#); [McCarroll, Janis](#)
Subject: RE: FEMA Review Requested of Revision to the Davis-Besse Nuclear Power Station Emergency Plan for Post-Shutdown and Permanently Defueled Condition
Date: Wednesday, May 08, 2019 5:28:00 PM
Attachments: [FEMA HO RESPONSE - NRC Letter dated March 7 2019 Final.pdf](#)
[image001.png](#)

Mr. Fiore (Craig) --

As always, thank you for your timely response to the NRC's request for FEMA's review of the proposed Davis-Besse Post-Shutdown Emergency Plan license amendment request, which would reduce the licensee's emergency response organization (ERO) staffing, under the existing EP regulations, following permanent cessation of power operations.

Page 2 of the FEMA's enclosed letter dated May 8, 2019, provides the following comment:

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.

Based on final NRC approval, the Davis-Besse Post-Shutdown Emergency can be implemented by FENOC following written certification to the NRC that the Davis-Besse reactor has permanently ceased power operations and permanently removed fuel from the reactor vessel. Upon docketing of these certifications, the 10 CFR Part 50 license will no longer authorize operation of the reactor or emplacement or retention of fuel into the reactor vessel. Implementation of the Davis-Besse Post-Shutdown Emergency Plan does not alter any requirements for formal offsite radiological emergency response plans under 44 CFR 350.

Subsequently, the Davis-Besse Post-Shutdown Emergency Plan would be superseded by the Davis-Besse Permanently Defueled Emergency Plan, which would implement requested exemptions to EP requirements based on the Commission's approval of these exemptions. At this time, FENOC has not submitted to the NRC an exemption request to certain requirements of 10 CFR 50.47 and Appendix E to 10 CFR Part 50 for DBNPS. However, based on recent decommissioning EP exemption reviews for pressurized water reactors, the criteria provided in Section 5.0 to NSIR/DPR-ISG-02, "Emergency Planning Exemption Requests for Decommissioning Nuclear Power Plants" (Agencywide Documents Access and Management System (ADAMS) Accession No. ML14106A057) was met approximately 16 months after permanent cessation of power operations; however, this will vary based on various factors (plant design, fuel type, fuel storage configuration in the spent fuel pool, etc.).

Calhoun (Combustion Engrg.): 18 mos.
San Onofre Units 2&3 (Combustion Engrg.): N/A¹
Crystal River 3 (Babcock & Wilcox): 15.4 mos.
Kewaunee (Westinghouse 2-loop): 17 mos.

¹ Licensee analysis demonstrated that 10 hour threshold had already been exceeded at the time of EP exemption request in March 2014. SONGS Units 2 and 3 have been permanently shut down since January 2012. After the reactors were shut down, all fuel assemblies were removed from the reactor vessels and placed in the SFP (on October 15, 2012, at Unit 3 and on July 18, 2013, at Unit 2).

I will provide FEMA an electronic copy of FENOC's decommissioning EP exemption request for Davis-Besse once the submittal is received, docketed and declared in ADAMS as a public record.

Thank you for the comment, and I will look at addressing it in subsequent requests for FEMA to review future post-shutdown emergency plan license amendment requests. I you have any further question, please do not hesitate to contact me.

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From: THD-Action-Office <thd-action-office@fema.dhs.gov>
Sent: Wednesday, May 08, 2019 2:30 PM
To: Anderson, Joseph <Joseph.Anderson@nrc.gov>
Cc: THD-Action-Office <thd-action-office@fema.dhs.gov>; Quinn, Vanessa <Vanessa.Quinn@fema.dhs.gov>; Fiore, Craig <Craig.Fiore@fema.dhs.gov>; Harris III, Timothy <timothy.harrisiii@fema.dhs.gov>
Subject: [External_Sender] FEMA Review Requested of Revision to the Davis-Besse Nuclear Power Station Emergency Plan for Post-Shutdown and Permanently Defueled Condition

Good Afternoon Joseph,

Please accept the letter concerning the License amendment request – Proposed changes to the Davis Besse Nuclear Power Station Emergency Plan for permanently defueled conditions. If you have any questions, please contact Timothy Harris (CC line).

Thank you in advance. Have a good day.

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