

Maine Yankee

RELIABLE ELECTRICITY FOR MAINE SINCE 1912

EDISON DRIVE • AUGUSTA, MAINE 04336 • (207) 622-4868

November 6, 1989

MN-89-139

GDW-89-354

Director of Nuclear Reactor Regulation
UNITED STATES NUCLEAR REGULATORY COMMISSION
Washington, DC 20555

Attention: Mr. Richard H. Wessman, Project Director
Division of Reactor Projects I/II

References: (a) License No. DPR-36 (Docket No. 50-309)
(b) Maine Yankee Letter to USNRC Region 1 dated
October 27, 1989 (MN-89-130)

Subject: Exemption Request

Gentlemen:

Maine Yankee requested, in Reference (b), that the full-participation exercise scheduled for November 14 and 15, 1989, be rescheduled and Maine Yankee be granted an exemption to NRC regulations requiring such a biennial offsite exercise (10 CFR 50, Appendix E, IV).

Enclosure 1 contains information requested by the staff regarding the status of onsite and offsite exercises for Maine Yankee and the status of corrective actions for the offsite deficiencies from the 1987 full-participation exercise.

As we have discussed with the NRC staff, our request for exemption to the requirement to conduct a biennial offsite exercise does not impact the public health and safety. The fundamental reason for the request is that, as you know, FEMA Region I cannot evaluate the offsite aspects of the November 14 and 15 exercise because they are assisting victims of recent actual disasters in this country. The State of Maine supports the rescheduling of the exercise to a future date that is convenient for all affected parties. (See Enclosure 2.)

CDW89354.LTR

8911170061 891106
FDR ADOCK 05000309
F PDC

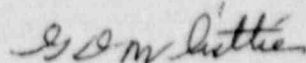
A045
11

UNITED STATES NUCLEAR REGULATORY COMMISSION
Attention: Mr. Richard H. Wessman

MN-89-139
Page two

The exemption is only for a temporary period until the exercise can be rescheduled. We believe that this situation constitutes special circumstances as described in 10 CFR 50.12(a)(2)(v). Your immediate attention to this matter is greatly appreciated.

Very truly yours,



G. D. Whittier, Manager
Nuclear Engineering and Licensing

SDE:WSD

Enclosure

c: Mr. Eric J. Leeds
Mr. William Lazarus
Mr. William T. Russell
Mr. Cornelius F. Holden
Mr. Jack Dolan, FEMA Region I
Mr. David Brown, Director, Maine Emergency Management Agency

GDW89354.LTR

ENCLOSURE 1

ONSITE

Onsite emergency preparedness has been evaluated by the NRC during inspections and exercises. The most recent partial-participation exercise was conducted on September 20, 1983. The exercise involved the participation of the State of Maine Emergency Response Team (ERT), the State's offsite monitoring team members (who combine with the Maine Yankee offsite monitoring teams as an integral unit), demonstrating command/control, interface with State representatives in the Maine Yankee EOF, radiological impact assessment, protective action recommendation decision making, communications and information flow. The NRC evaluation of the exercise concluded that Maine Yankee's "performance was adequate to protect the public health and safety" (Reference 1).

Maine Yankee's capability to respond to a simulated emergency has been demonstrated in full-participation exercises conducted in 1981, 1982, 1985 and 1987, and in annual onsite exercises conducted in 1983, 1984, 1986 and 1988. In every case, Maine Yankee demonstrated that it could adequately protect the public health and safety in the event of an emergency at the plant.

During 1989 Maine Yankee has, on four occasions (April, September, twice in October), exercised the implementation of the emergency plan procedures. Each drill or exercise included an evaluation of the participants' performance and identification of appropriate corrective actions. The most recent exercise was independently evaluated, in addition to Maine Yankee's evaluation team, by a team from INPO. These exercises and drills of the emergency response organization continue to refine and provide Maine Yankee's further assurance of its capability to adequately respond to a plant emergency.

ENCLOSURE 1
(continued)

OFFSITE

The State of Maine, counties and communities in the Maine Yankee Emergency Planning Zone (EPZ) have fully participated in exercises conducted in 1981, 1982, 1985, and 1987. The State of Maine also participated in a mini-exercise in 1983 in which FEMA evaluated the State's capabilities that adequately addressed areas of concern from the previous year's exercise.

° Since the last full-participation biennial exercise (in 1987) in which State, county and community agencies/officials, with few exceptions, adequately demonstrated their emergency response capability, the State of Maine has successfully participated in a two-day ingestion pathway exercise during June 1988 for Seabrook, and also participated in two two-day training exercises during 1988 for the Seabrook plant.

° The State of Maine participated in the partial-participation annual exercise for Maine Yankee conducted in September 1988 (see earlier discussion).

° The State participated, to a limited extent, in the April 1989 minidrill that involved the actuation, staffing and operation of the onsite emergency response facilities.

° Maine Yankee conducted a table-top training drill on the ingestion pathway responses and activities for key State of Maine officials in August 1989.

° The State of Maine Emergency Operations Center (EOC) was fully staffed with the Emergency Response Team and the Joint Media Center exercised its capability during the October 1989 exercise evaluated by INPO personnel.

Exercise Controllers/evaluators in the State EOC considered that, overall, the State adequately implemented plans and procedures that would be used in an actual emergency.

ENCLOSURE 1
(continued)

OFFSITE

- ° Emergency preparedness training sessions were conducted for each of the sixteen communities and two counties in the primary EPZ between September 12 and October 25, 1989. The team, consisting of representatives from Maine Yankee, Maine Emergency Management Agency (MEMA), the Maine Division of Health Engineering, and Maine Yankee's consultant, reviewed the key aspects of the community's responsibilities during a radiological emergency. The communities exercised their emergency procedures, checklists, verified equipment operability and updated community status boards and resource information during a table-top training drill session. These sessions were highly successful and were well-received by community emergency responders.

ENCLOSURE 1
(continued)

The following is a status report on the enhancements being made to the Public Emergency Alerting System (PEAS) and other offsite deficiencies from the 1987 full-participation exercise.

1. Numerous inadequacies in the alert and notification system has been consistently identified since 1981.

In cooperation with MEMA, Maine Yankee has developed a program to enhance the physical means that presently exist to alert the public in the event of an emergency at the plant that necessitated public protective measures. Implementation of the additional stationary sirens planned are ahead of schedule. Presently 18 of 20 planned sirens have been installed. Power has been provide to most of the new sirens so they are capable of local activation. Installation of the remaining radio activation control equipment should be completed before the end of December 1989.

Additionally, Maine Yankee plans to install a few more sirens in strategic locations that will further enhance the existing alerting system. Although we endeavor to complete the installation of all sirens as expeditiously as possible, we plan to have all sirens operable by December 1990.

To augment the stationary sirens, the State of Maine has coordinated the distribution of approximately 230 tone alert radios to public buildings, institutions, schools, hospitals, campgrounds, State parks, etc. An approximate equal number of radios should, depending on final projected siren coverage, be distributed to dwellings by December 31, 1990.

2. The State lacked the mechanism to properly analyze and respond to local protective action decision including appropriate emergency broadcast station (EBS) messages.

Appropriate changes have been included in final revisions to the State and community emergency response plans. These plans are targeted for issuance by the end of December, 1989.

3. Public Emergency Alerting System (PEAS) telephone inoperable in two towns and its operation was sporadic in several others.

The corrective action is complete; community training was completed on October 25, 1989.

ENCLOSURE 1

(continued)

4. Preliminary Maine Yankee protective action recommendations were transmitted over the PEAS telephone along with those actually adopted by the State, which caused confusion in the towns.

State procedures have been revised and training completed.

5. PEAS multi-point telephone operator failed to transmit some messages to local EOCs in a timely manner.

State procedures have been revised and training completed.

6. Protective action recommendations not disseminated to the public within 15 minutes.

Prescribed EBS messages have been developed and their dissemination successfully simulated.

7. Several islands within Phippsburg have no means for alerting the residents/tourists.

As described in our September 7, 1989, status report (Reference 2), the number of dwellings on islands in the EPZ requiring tone alert radios has been dramatically reduced because of enhanced coverage of the newly installed stationary sirens. The alerting capability provided by the new sirens, plus the out-migration of the seasonal residents, has deferred the distribution of tone alert radios until the summer of 1990 to coincide with the return of the seasonal residents.

8. Alerting teams not cognizant of procedures for alerting tourists at campgrounds, beaches, etc.

The corrective action for this deficiency is complete. Additional training has been conducted with community emergency response personnel. We understand that the State has distributed tone alert radios to campgrounds, State parks, etc., as necessary.

References:

1. USNRC Inspection Report No. 50-309/88-17, November 1, 1988.
2. Maine Yankee Letter to USNRC Region I dated September 28, 1989 (MN-89-122).