

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
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EMERGENCY MANAGEMENT AGENCY

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May 13, 1993
DOCKETING SERVICE
BRANCH

Mr. Samuel Chilk, Secretary
Mail Stop 16G15
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Chilk:

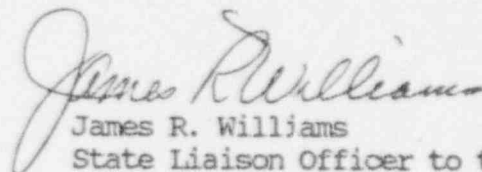
The Ohio Emergency Management Agency (Ohio EMA) would like to have its comments considered on Federal Register, Vol. 58, No. 41, 12339, dated March 4, 1993, which is entitled, "Nuclear Regulatory Commission, 10 CFR Part 50, Virginia Electric and Power Company, Filing of a Petition for Rulemaking." The Virginia Electric and Power Company has petitioned the NRC to consider revising its current regulations governing domestic licensing of production and utilization facilities to change the frequency of required emergency planning exercises from annually to biennially.

Ohio EMA is responsible for coordinating radiological exercises for the state of Ohio. We are required to exercise biennially with power plants that reside in -- or have impact on -- the state of Ohio. These plants are the Davis-Besse Nuclear Power Station, Perry Nuclear Power Plant, and the Beaver Valley Power Station. Ohio EMA currently exercises each year with at least one of the power plants. Reducing the frequency of utility-required exercises would not adversely diminish Ohio's opportunities to exercise with each of our utilities.

In addition, the three power plants that impact Ohio have consistently attained a Systematic Assessment of Licensee Performance (SALP) score of 1 for the functional area of emergency preparedness. Reducing the frequency of utility-required exercises should not reduce the quality of emergency preparedness in Ohio.

In summary, Ohio EMA supports the change in frequency of required emergency preparedness exercises from annually to biennially.

Sincerely,


James R. Williams
State Liaison Officer to the NRC

CAO/kb

cc:
Janet Odeshoo, FEMA Region V, Chicago, IL
Gordon Wenger, FEMA Region V, Battle Creek, MI

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