

DMB

August 18, 1982

Docket No. 50-254  
Docket No. 50-265

Commonwealth Edison Company  
Quad-Cities Nuclear Power Station  
ATTN: Mr. N. J. Kalivianakis  
Station Superintendent  
22710 206 Avenue North  
Cordova, IL 61242

Gentlemen:

This refers to your letter dated August 6, 1982, and our subsequent telephone conversation on August 12, 1982, with respect to your request that the assembly and accountability portion of the exercise be conducted on Thursday, August 19, rather than in conjunction with the exercise. Your letter cites the following two reasons for this request: (1) final preparations for the unit one re-fueling outage would be underway at that time; and (2) the Station could more effectively use its manpower during the exercise, especially during the critical first hour following event initiation. After reviewing this request, we have determined that your request cannot be granted as I discussed with you in our telephone conversation.

Although an unannounced assembly/accountability drill was held separate from the May 20, 1981, exercise; the understanding reached between Dr. John Golden of Commonwealth Edison and Mr. Bill Axelson of our office was that this version of separating assembly/accountability from the exercise would be allowed for round one (April 1981 through March 1982) exercises only. 10 CFR 50, Appendix E, Section IV.F.1 requires that a full-scale exercise which tests as much of the licensee's emergency plan as is reasonably achievable shall be conducted at a frequency which will enable each local government within the plume exposure pathway EPZ to participate in at least one full-scale exercise per year. Section 8.3.1 of the generic portion of the GSEP also includes the requirements described in Section IV.F.1 of Appendix E stated above.

Once a year, at the exercise conducted pursuant to 10 CFR 50, Appendix E, IV.F, the NRC observes licensee performance in order to make a finding with respect to the licensee's state of preparedness. In a true emergency of sufficient magnitude, site assembly, accountability, and possible rescue actions must be taken concurrently with actions to mitigate the consequences of the event. One purpose of this exercise is to demonstrate that these actions can be implemented concurrently. Therefore we feel it is necessary that assembly/accountability be conducted in conjunction with the annual exercise.

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Mr. N. J. Kalivianakis

2

August 13, 1982

From our telephone conversation, I understood that Quad Cities will conduct assembly/accountability as part of the annual exercise. If I can answer any other questions, do not hesitate to call.

Sincerely,

C. J. Paperiello, Chief  
Emergency Preparedness and  
Program Support Branch

cc w/attachment;

Louis O. DelGeorge, Director  
of Nuclear Licensing  
Cordell Reed, Vice President  
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