



Harry Tauber
Group Vice President

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

January 7, 1983
EF2-61447

Mr. B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Re: The Detroit Edison Company, Enrico Fermi Unit No. 2,
Docket No. 50-341; Request for Exemption

Dear Mr. Youngblood:

Detroit Edison is required by Section IV. F. 1 of Appendix E to 10 CFR Part 50 to conduct a full-scale emergency preparedness exercise within one year before issuance of a full power operating license for the Fermi 2 Power Plant. A full scale exercise in participation with the State of Michigan and local governments was conducted on February 1-2, 1982, and was reviewed by both NRC Region III and Federal Emergency Management Agency (FEMA) Region V. At the present time, a small scale exercise is scheduled for April 26-27, 1983.

The purpose of this letter is first, to request that the date for the exercise currently scheduled for April, 1983, be rescheduled to October 4-5, 1983; and second, that pursuant to 10 CFR 50.12, Detroit Edison be granted an exemption from the requirements of Appendix E set forth above to allow the Company to conduct a small scale exercise instead of a full-scale exercise.

The reasons for Detroit Edison's request for an exemption from the full-scale exercise requirements of Appendix E can be summarized as follows:

1. Fermi 2 completed a successful full-scale exercise with State and local governments on February 1-2, 1982 (see NRC Region III Inspection Report and FEMA Region V Final Report);
2. The State of Michigan has scheduled its annual full-scale exercise with the Consumers Power Company Midland Plant on March 8-9, 1983, or at the Palisades Plant in April, 1983;

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Mr. B. J. Youngblood, Chief
U.S. Nuclear Regulatory Commission
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3. During a small-scale exercise the State is responsible for the radiological aspects of an emergency and activates sufficient resources and personnel to respond to dose assessment and protective action recommendations thereby enabling the local governments to simulate whatever procedures are necessary. Therefore, a second full-scale exercise in 1983, would create an unnecessary additional financial burden on the State.

From a scheduling perspective, movement of the exercise date from April, 1983, to October, 1983, is a more realistic and practical date because:

1. An April, 1983, exercise would conflict with the testing and system start-up activities. An October, 1983, exercise would allow Detroit Edison to pursue these activities without as great an impact on the start-up and testing program.
2. Licensed reactor operator examinations are currently planned for April, 1983. The conflict created by the performance of an April exercise would in all probability adversely affect the operators' preparations for their examinations;
3. Finally, the completion schedule for the Company's permanent on-site Emergency Response Facilities is such that with an April, 1983, exercise date, there would only be about a one month period in which to train and familiarize essential personnel with the new facility. An October, 1983, exercise date would be much more practical.

In summary, Detroit Edison believes that the reasons set forth above adequately support its requests for exemption and for scheduling change, and that the state of on-site emergency preparedness at the Fermi 2 site provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency.

Furthermore, the Company's requests have been communicated to FEMA and the State of Michigan and their concurrence is demonstrated in the letters attached to this request.

Very truly yours,

Detroit
Edison

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8900

DEC 7 1982

T. RANDAZZO

DEC 15 1982

December 3, 1982

Mr. John T. Anderson
Regional Director
Federal Emergency Management Agency
Region V
300 South Wacker, 24th Floor
Chicago, IL 60606

Dear Mr. Anderson:

Subject: Emergency Preparedness Exercise Schedule for Fermi 2

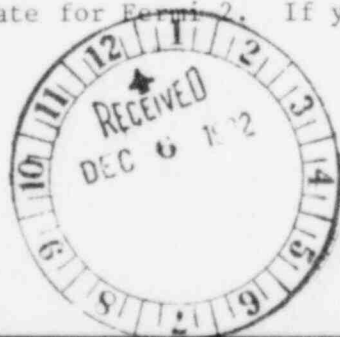
Detroit Edison is preparing to seek an exemption from the NRC to conduct a small scale exercise in the time period of October 4-5, 1983. Currently, a small scale exercise is scheduled for April 26-27, 1983.

An exercise date of April 26-27 will impact the testing and system start-up activities associated with our planned fuel load date of June, 1983. For this reason, an October 4-5, 1983 exercise date would allow Detroit Edison to pursue the testing and start-up activities without having to interrupt these in order to train for an exercise.

Additionally, licensed operator examinations are currently planned for April, 1983. By having to train for an exercise in April, 1983, the operators would not be able to adequately prepare for these very critical examinations.

One other factor supporting Detroit Edison's request to change the exercise date to October 4-5, 1983, relates to completion of our permanent on-site Emergency Response Facilities. With the current schedule, Detroit Edison would only have about one month to train its people in these new facilities. Given the importance of the exercise, a one-month period to train in and become familiar with these facilities would be wholly impractical.

Pursuant to an NRC Region III letter of May 12, 1982, Detroit Edison is seeking your concurrence with this proposed change in the small-scale exercise date for Fermi 2. If you concur with this proposed



Mr. John T. Anderson
December 3, 1982
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change in dates, please sign in the appropriate space provided herein and return to Mr. Thomas Randazzo, Supervisor-Radiological Emergency Response Preparedness at Detroit Edison. Your return response by December 10, 1982, is respectfully requested.

Sincerely,

Thomas Randazzo

Thomas Randazzo
Supervisor-Radiological
Emergency Response Preparedness

TR:gs

DEP/82/264

cc: Peter R. Basolo (Michigan State Police)

Concurrence

John T. Anderson

John T. Anderson
Regional Director

12/9/82

**Detroit
Edison**

2000 Second Avenue
Detroit, Michigan 48226
(313) 237-8000

J. RANDAZZO

DEC 9 1982

December 3, 1982



Captain Peter R. Basolo
Deputy State Director of Emergency Services
Emergency Services Division
Michigan Department of State Police
111 S. Capitol Avenue, Lower Level
Lansing, Michigan 48913

Dear Captain Basolo:

Subject: Emergency Preparedness Exercise Schedule for Fermi 2

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Captain Peter R. Basolo
December 3, 1982
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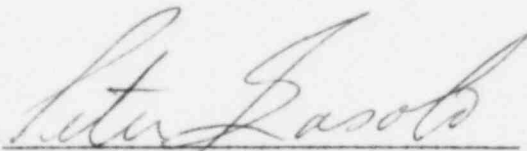

Thomas Randazzo
Supervisor-Radiological
Emergency Response Preparedness

TR:gs

DEP/82/263

cc: John T. Anderson (FEMA)

Concurrence:



Peter R. Basolo, Captain
Deputy State Director of
Emergency Services