Georgie F, wei Company 333 Fieldmont Avenue Telephone 404 526 3195

40 Inverness Center Parkway Post Office Box 1295 Birmingham Alabama 25201 Telephone 205 868 5581

December 13, 1990

ELV-02272 0711

A001

W. G. Hairston, III Setion Vice President Nuclear Operations

Locket Nos. 50-424 50-425

U. S. Nuclear Regulatory Commission Region II - Suite 2900 10. Marietta Street, N. W. Atlanta, Georgia 30303

Attention: Mr. Douglas M. Collins, Chief Emergency Preparedness and Radiological Protection Branch

Gentlemen:

VOGTLE ELECTRIC GENERATING PLANT AFTER HOURS EXERCISE WAIVER REQUEST

The Vogtle Electric Generating Plant (VEGP) Emergency Plan, Section N.1.2, requires that an emergency preparedness exercise which starts between 6:00 PM and 4:00 AM be conducted once every six years. Additionally, the plan states that some exercises and/or drills will be unannounced. NUREG 0654 FEMA-REP-1, Rev. 1, section N.1.b, states that "An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response." The states of South Carolina and Georgia, and all counties within the 10 mile plume exposure emergency planning zone have satisfied the FEMA requirements of an unannounced after hours exercise as a result of the 1989 Emergency Operations Center activations for Hurricane Hugo. In view of the above, it is requested that the NRC authorize VEGP to conduct an after hours unannounced drill during calendar year 1991 in lieu of an after hours unannounced exercise.

If approved, the drill scenario will provide for the following:

- 1. It will be scheduled for a particular two weeks period but the exact date and time will be unannounced.
- 2. It will be initiated between 6:00 PM and 4:00 AM.

9012180073 901213 FDR ADOCK 05000424

PDF

FDR

- It will result in the TSC and OSC being activated and the EOF being brought to at least standby status.
- A minimum of two field monitoring teams will be deployed.
- 5. The emergency response organization personnel recall system will be exercised.
- 6. The augmentation staff, VEGP Emergency Plan Table B-1, will be activated.



U. S. Nuclear Regulatory Commission Region II - Suite 2900 ELV-02272 Page 2

Justification for this request is as follows:

- The states and counties have recently satisfied the requirements for an after hours unannounced exercise and therefore do not need or desire to demonstrate any further integrated capability. Elimination of this additional exercise would result in considerable savings to the states and counties in both manpower and expense.
- The principal objectives of an after hours unannounced exercise; i.e., personnel augmentation, activation of emergency response facilities, and demonstration of field monitoring team capabilities after hours, can be readily demonstrated in the drill format.
- GPC will conduct an emergency exercise during regular hours in 1991 to demonstrate the integrated capability of emergency preparedness response.

If this request is approved the exact date and time of the after hours drill will be coordinated with the NRC resident inspector.

Sincere y,

W.S. Hent

W. G. Hairston, III

WGH, II1/JJ8/gm

xc: Georgia Power Company Mr. C. K. McCoy Mr. W. B. Shipman Mr. P. D. Rushton Mr. R. M. Odom NORMS

> <u>U. S. Nuclear Regulatory Commission</u> Mr. S. D. Ebneter, Regional Administrator Mr. D. S. Hood, Licensing Project Manager, NRR Mr. B. R. Bonser, Senior Resident Inspector, Vogtle