

PHILADELPHIA ELECTRIC COMPANY

2301 MARKET STREET
P.O. BOX 8699
PHILADELPHIA, PA. 19101

SHIELDS L. DALTRUFF
VICE PRESIDENT
ELECTRIC PRODUCTION

(215) 841-5001

April 20, 1983

Docket Nos. 50-277
50-278

Mr. Darrell G. Eisenhut
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Request for an Exemption from Certain Annual
Exercise Requirements of 10 CFR 50

Dear Mr. Eisenhut:

Pursuant to Section 50.12 of the Commission's regulations, this letter requests exemption from certain annual exercise requirements of 10 CFR 50, Appendix E, IV.F.1.a. Exemption from the described requirements will not, in the Company's view, endanger the public and is otherwise in the public interest.

Although the Peach Bottom facility will fully exercise its plan and procedures in June, 1983, as a result of discussion with the Pennsylvania Emergency Management Agency (PEMA) and the Maryland Emergency Management and Civil Defense Agency (MEM&CDA), the Licensee understands that the planned level of participation by the local governments (counties) within the plume exposure Emergency Planning Zone (EPZ) for the June 28, 1983 Peach Bottom Atomic Power Station exercise may not be in complete conformance with the requirements of 10 CFR 50, Appendix E, IV.F.1.a. The planned level of participation by the states and counties within the plume exposure EPZ is detailed in Attachment I. This level of participation is consistent with 10 CFR 50, Appendix E, IV.F.3. Therefore, to the extent that the proposed exercise is not consistent with 10 CFR 50, Appendix E, IV.F.1.a., we request an exemption from those requirements, allowing the proposed exercise which meets 10 CFR 50, Appendix E, IV.F.3. to qualify as the "annual exercise".

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The level of participation involved will allow the risk counties and states to exercise the major interfaces with the utility organization and government agencies. The participation

will test major portions of the plan without mandating public (volunteer) participation. Licensee believes that the state and local governments participating as now proposed will receive measurable benefits from the exercise in the areas of communication, activation and public information. The exercise will aid in ensuring an adequate level of emergency preparedness.

Two of the risk counties, York and Lancaster, will participate with the Three Mile Island Nuclear Station in an emergency exercise during 1983. Thus, these counties will exercise their response function with PBAPS on a limited basis and with TMI prior to the 1984 PBAPS annual exercise. In addition, Chester County will participate with the Limerick Generating Station in an emergency exercise during the first quarter 1984, prior to the 1984 Peach Bottom exercise. Therefore, all the Peach Bottom risk counties within Pennsylvania can be expected to be exercised with another nuclear facility. Thus, their preparedness will not be reduced by limited participation in the 1983 Peach Bottom exercise. Since the State of Maryland and the Maryland counties act in concert with the Pennsylvania agencies, their participation in the exercise must be consistent with Pennsylvania's. Thus, limited participation will not decrease their emergency preparedness, but rather reinforce the type and level of coordination and communication between the two entities.

Should you have any questions or require additional information regarding this matter, please do not hesitate to contact us.

Very truly yours,



Attachment

cc: R. A. Blough
Site Inspector

ATTACHMENT 1

PEACH BOTTOM 1983 OFFSITE EXERCISE PARTICIPATION

Pennsylvania, Chester County, Lancaster County, York County

1. Test adequacy of communications links and initial notification for state agencies, counties, municipalities, and area headquarters.
2. Test response agency understanding of emergency action levels.
3. Test sirens and EBS system at county level.
4. Test PEMA public information.
5. Test Bureau of Radiation Protection (BRP) response.

Maryland, Harford County, Cecil County

1. Test the adequacy of communication links and notification procedures.
2. Test response agency understanding of emergency action levels.
3. Test emergency medical services functions.
4. Test state and plume zone county's public information program.
5. Test the siren activation and EBS system.