



**Commonwealth Edison**

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October 15, 1984

Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Subject: Byron Generating Station Units 1 and 2  
Emergency Plan Exercise  
NRC Docket Nos. 50-454 and 50-455

Dear Mr. Denton:

This is to request an exemption from the provisions of section IV.F of Appendix E to 10 CFR 50 insofar as these provisions require that the first full participation emergency preparedness exercise at Byron Station be conducted within 12 months of the issuance of the Byron full power operating license.

As you know, the first full participation emergency preparedness exercise for Byron Station was conducted on November 15, 1983. Both the onsite and offsite elements of that exercise were considered very successful. The success of this exercise contributed to the acceptance of emergency plans for Byron Station by the prompt FEMA and NRC. At the time of that exercise it was believed that the Byron 1 operating license would be issued in early 1984.

Section IV.F of Appendix E provides that a full participation exercise be conducted within one year of the issuance of the first operating license for full power operation of a facility such as Byron Generating Station. Because of unexpected delay in receiving the Byron 1 operating license due to licensing hearings, we are uncertain that a full power operating license will be issued within a year of the full participation exercise. To allow for the possibility that the full power license for Byron 1 is not issued by November 15, 1984, Commonwealth Edison requests an exemption from the requirement that a full participation exercise be conducted within one year prior to issuance of that license.

We believe that this exemption will not involve a significant extension of the one year time period. We expect that the ASLB's decision and the initial license will be issued within the next month. The plant should be ready for a full power authorization approximately nine weeks after receipt of the initial license.

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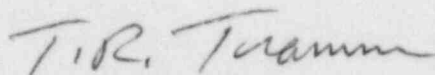
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We are confident that an acceptable state of emergency preparedness will be maintained if this exemption is granted. The State of Illinois participates with Commonwealth Edison in an exercise at one of our other plants several times a year. Communications capabilities with state and local agencies are demonstrated every month and the annual communications drill with these agencies was conducted in September 1984. At Byron Station, two health physics drills, an environmental drill, and an off-shift augmentation drill were conducted in 1984. Emergency action levels were reviewed with local officials in an annual meeting on September 20, 1984. A medical drill was conducted in June 1984 which included the support hospital and their staff. The Byron Station plans and preparedness have been reviewed by the NRC during the emergency preparedness appraisal and several follow-up inspections.

Current schedules call for a Byron Station emergency preparedness exercise with partial offsite participation in June 1985, pending favorable disposition of this request.

Please address questions regarding this matter to this office.

Very truly yours,



T. R. Tramm  
Nuclear Licensing Administrator

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cc: Byron Resident Inspector  
Monte Phillips, Region III

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