



Federal Emergency Management Agency

Washington, D.C. 20472

AUG 13 1984

MEMORANDUM FOR: Edward L. Jordan
Director, Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological Hazards Programs

SUBJECT: Salem and Hope Creek Nuclear Power Plant Exercises

On July 2, 1984, Major Harold E. Spedding, Deputy State Director, New Jersey Office of Emergency Management, wrote to the Federal Emergency Management Agency (FEMA) Region II office concerning several matters related to the forthcoming Salem and Hope Creek Nuclear Power Plant (NPP) exercises including: The question of FEMA Region II participation in the exercises; the fact that the Nuclear Regulatory Commission (NRC) had informed the Public Service Electric and Gas Company that a joint observed exercise of both States must be held to verify capabilities prior to the licensing of the Hope Creek NPP; and, the question of whether the joint exercise requirement could be satisfied by limited observation of communications and accident assessment capabilities between both States.

As you know, the Salem exercise, scheduled for October 1984, will be a full-participation exercise which will be observed and evaluated by FEMA. Since the Salem and Hope Creek reactors are collocated, they share the same 10-mile emergency planning zone (EPZ) and, therefore, are considered by FEMA as a single site.

FEMA's rule 44 CFR 350.9 (c)(1) and (2) provides that State and local governments with a commercial nuclear power site or portions of a 10-mile EPZ within their boundaries shall fully participate in an exercise jointly with the nuclear power plant licensee at least every two years. The exception to this rule would be if a verification of remedial actions required an exercise within a shorter time period. Therefore, if FEMA finds that the October 1984 Salem NPP offsite exercise provides a reasonable assurance that the health and safety of the public can be protected in the event of an accident at the Salem NPP, FEMA would not require participation in a full-participation exercise for the Hope Creek NPP in 1985. Again, this is because the Salem and Hope Creek NPP's are considered as a single site for offsite emergency preparedness and planning purposes.

8408210408 840813
PDR ADOCK 05000272
F PDR

1E35 1/0

In addition, NRC's final rule 10 CFR 50.47, appendix E, section IV.F.1., does not make a 1985 full participation exercise at Hope Creek a condition of licensing. It states in part that:

a full-participation exercise which tests as much of the licensee, State and local emergency plans as is reasonably achievable. . . shall be conducted for each site at which a power reactor is located for which the first operating license for that site is issued after July 13, 1982. This exercise shall be conducted within one year before the issuance of the first operating license for full power and prior to operation above 5% of rated power of the first reactor. . . .

It is our understanding that Salem Unit 1 was given a full power operating license in April 1977, and Unit 2 received a full power operating license in August 1981. Thus, since the first operating license for the Salem/Hope Creek site was issued prior to July 13, 1982, a full-participation exercise in 1985 at the Salem/Hope Creek site is not required by either NRC's or FEMA's rules. Therefore, the October 1984 exercise can be utilized for purposes of licensing Hope Creek by January 1986, the date now projected for a Commission decision on such a license.

Based on the above analysis, FEMA does not intend to conduct a full-scale evaluation of the 1985 Hope Creek exercise. FEMA would, however, be willing to conduct a limited observation of a Hope Creek exercise, if requested by New Jersey.

If you have any questions, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division at 287-0200.