



Duquesne Light

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September 11, 1984

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Exemption to Appendix E 10CFR50 Test Schedule

Gentlemen:

This submittal is to request a permanent change to the originally scheduled emergency preparedness exercise date of February 1985. A June 1984 drill date was previously set at a FEMA Region V and NRC Region III meeting held April 21, 1982 in Chicago 1983 with subsequent NRC approval.

We are requesting that our next drill date be revised to September 1, 1985 so that the following benefits could be derived:

1. The Station would be able to utilize its new simulator facility to develop the detailed operational data needed for the exercise. This would help eliminate costly vendor assistance in scenario development.
2. Based on the current Beaver Valley Unit II Construction schedules, a September exercise may eliminate the need for two exercises in 1986 since the emergency organizations and major facilities are the same for both units.
3. NUREG-0654/FEMA-Rep-1 states that exercises should be conducted under various weather conditions. Beaver Valley has already successfully conducted two winter exercises in February 1982 and 1983 and a summer drill in June of 1984. A September schedule would provide us a ± 3 -month window in which the summer or winter scenarios could be tested and comply with Appendix E 10CFR50 and NUREG 0654.

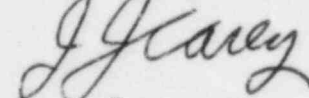
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Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
Exemption to Appendix E 10CFR50 Test Schedule
Page 2

This revised test schedule would exceed the annual 1985 test frequency as set forth in 10CFR50, Appendix E, Section IV.F. and NUREG-0654/FEMA-Rep-1, based on the successful exercise conducted at Beaver Valley on June 27, 1984. However, we believe the benefits to be derived from the revised test schedule are beneficial and would also reduce the extensive manpower requirements required for these efforts.

Very truly yours,



J. J. Carey
Vice President, Nuclear

cc: U. S. Nuclear Regulatory Commission
Office of Inspection & Enforcement
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Mr. W. M. Troskoski, Resident Inspector
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U. S. Nuclear Regulatory Commission
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