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Nuclear
Operations

June 14, 1985
VP-85-0143

Mr. B. J. Youngblood, Chief
Director of Nuclear Reactor Regulation
Licensing Branch No. 1
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Youngblood:

Reference: Fermi 2
NRC Docket No. 50-341
NRC License No. NPF-33

Subject: Emergency Preparedness Exercise for Fermi 2

Section IV.F.1 of Appendix E to 10CFR50 provides that a full participation exercise is to be conducted within one year before the issuance of the operating license for full power operation of a facility. Fermi 2 was issued a full power license with a 5% power limitation licensing condition on March 20, 1985. To allow for the possibility that the 5% power limitation is not lifted by June 26, 1985, Detroit Edison requests an exemption pursuant to 10CFR50.12 from the requirement that a full participation exercise be conducted within one year prior to issuance of the full power operating license.

The first full participation emergency preparedness exercise for Fermi 2 was conducted on February 1-2, 1982. Both the onsite and offsite elements of that exercise were successful and demonstrated an exceptional degree of emergency preparedness. A second full participation exercise was conducted June 26-27, 1984 and demonstrated the high degree of emergency preparedness had been maintained.

At the time of the June 26 exercise it was anticipated that Fermi 2 would receive an operating license in December, 1984 and that full power would be achieved prior to June, 1985. Had this schedule been maintained, full compliance with Section IV.F.1 would have been achieved.

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This exemption will not involve a significant extension of the one year time period specified in Section IV.F.1. Fermi 2 is expected to be ready for power ascension operation by mid-July, 1985 and will be conducting an emergency preparedness exercise, with voluntary offsite participation, on October 2, 1985. Emergency Preparedness drills will be conducted in August and September prior to the exercise, some of which will involve integrated TSC, OSC and EOF response.

An acceptable state of emergency preparedness will be maintained if this exemption is granted. The State of Michigan participated in the full participation exercise at Fermi 2 in June, 1984 and participates four times a year in exercises involving Fermi 2, Big Rock Point, Palisades and D.C. Cook nuclear power plants. Additionally, Fermi 2 verifies communications with the state and local agencies monthly. Medical training and drills have been conducted at both support hospitals and with the ambulance staff in November, 1984. Fermi 2 held three drills of a large scale prior to the June exercise, including facility response drills. An accountability drill was conducted in December, 1984. Offsite local agencies participated in the 1984 drills and exercise. The Fermi 2 emergency plans and preparedness have been reviewed by the NRC during the emergency preparedness appraisal in 1983 and several followup inspections in 1984. Emergency Preparedness at Fermi 2 received a Category 1 rating in the most recent SALP report dated December 26, 1984.

The October 2, 1985 exercise date was established for the following reasons:

1. A date beyond June, 1985 was necessary because of plant testing activities. These activities are performed as required in the Fermi 2 Operating License and described in Chapter 14 of the Fermi 2 Final Safety Analysis Report. It is preferable not to conduct an exercise during this period, as it would involve numerous personnel and activities in the Control Room and TSC which might interfere with testing activities, plant operations, or both.
2. The exercise date was established with mutual consultation of FEMA Region V, NRC Region III, and state representatives. Since the Fermi 2 exercise in October is a utility-only exercise with voluntary offsite, local participation, priority was given to full-participation and partial-participation exercise dates. Therefore, it would create a severe impact to either reschedule the exercise or change the type of exercise to be conducted.

Mr. B. J. Youngblood

June 14, 1985

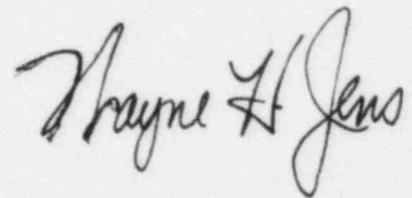
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For the reasons presented above, Detroit Edison believes that granting this exemption is authorized by law, will not endanger life or property, is not inimical to the common defense and security, and is in the public interest.

Any questions regarding this matter can be directed to Mr. O. K. Earle (313) 586-4211 or to Mr. Tom Randazzo, RERP Supervisor at (313) 586-4320.

Sincerely,

A handwritten signature in cursive script, appearing to read "Wayne H. Jens".

cc: Mr. P. M. Byron
Mr. F. Kantor
Mr. M. David Lynch
USNRC Document Control Desk
Washington, D.C. 20555