



10 CFR 50 App. E.IV.F

September 23, 1999 ENGC Ltr. 2.99.099

U.S. Nuclear Regulatory Commission Document Control Desk Washington, D.C. 20555 Docket 50-293 License No. DPR-35

Subject:

Supplementary information in support of previously filed Request for Exemption from 10 CFR 50 Appendix E Section IV.F (request date July 30, 1999).

Dear Sir:

The following information is submitted in support of a request that was filed on July 30, 1999. In that request, NRC was petitioned to grant Pilgrim Station a one-time exemption from the requirements of 10 CFR 50 Appendix E, Section IV.F. The exemption would authorize the biennial full participation emergency preparedness exercise for Pilgrim Station to be conducted in 2002 instead of 2001. The proposed deferral of the full participation exercise is consistent with the regional exercise schedule as prepared by NRC, FEMA, Massachusetts Emergency Management Agency (MEMA), and regional utility representatives at the FEMA Regions I, II, and III, and NRC Region I Exercise Scheduling Meeting and Workshop in White Plains, New York in December 1998 (copy of Rev. 1 of the schedule attached for reference).

In further support of this request, the following additional information is provided:

First, the rigorous existing training and drill schedule currently in place in support of Pilgrim's Emergency Response Organization during the period prior to the scheduled 2002 exercise date will remain in place. Pilgrim's current program includes the scheduling of annual classroom training of all emergency responders. Annual drill participation is accomplished by scheduling responders to participate as either players or controllers in one or more of the quarterly combined functional and/or activation emergency preparedness drills at Pilgrim Station. Further, Pilgrim Station conducts a self-evaluated annual exercise during the non-NRC evaluated exercise years. The self-evaluated exercise is generally in addition to the quarterly functional drills.

Second, offsite emergency response organizations maintain an active, ongoing level of training and involvement in support of radiological emergency response. The Mass anusetts Emergency Management Agency and Massachusetts Department of Public Health are routinely invited to and actively participate in Pilgrim Station's combined functional drills and off-year self-evaluated exercises. These organizations, as well as other State support organizations, are provided further opportunities to drill their plans and procedures in concert with two additional power stations which impact the Commonwealth, including Seabrook Station and Vermont Yankee. Local response groups are offered armual training and participation in EOC practical drills.

9909300220 990923 PDR ADOCK 05000293 F PDR Pilgrim Station Emergency Preparedness representatives meet monthly with State, Federal (FEMA), local EPZ and Reception Center offsite emergency management and support groups to maintain a high level of communication and state of readiness. This forum has provided a vehicle to discuss the scheduling and movement of potential dates for the biennial exercise, as well as other significant emergency preparedness topics. The movement of the Pilgrim Biennial Exercise was generally greeted with support from both State and local representatives, most importantly because the proposed date will uncouple the exercise year from Pilgrim's refueling year, allowing more freedom in exercise seasonal scheduling.

With the foregoing supplementary information and clarifications provided, Pilgrim hopes NRC will respond favorably to allow deferral of the 2001 biennial exercise to 2002 as requested. Also, in an effort to support the upcoming 1999 annual regional exercise scheduling meeting in November, it is hoped that NRC will respond as quickly as possible to the referenced request.

Please feel free to contact Mr. George Vazquez of my staff at (508) 830-8697 if you require any additional information regarding this request.

Alexander, Director Nuclear Assessment

JLR/sc

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	1999	2000	2001	2002	2003	2884
LAMUARY						
FEBRUARY				\$\$E\$ 02/04 - 02/08		SSES 02/02 - 02/06
MARCH		Milistone 03/13 - 03/17	(Sarry) (03/19 - 63/23)			Salem/HepsCreek 03/15 - 03/03/19
APRIL	Vermont Yankae (Inpostion) 04/26 - 04/26	Salem/Hopc Creek 04/10 - 04/14		Salem/Hope Creek 04/08 - 04/12	Vermont Yankee 04/07 - 04/11	Pilgrim 04/12 - 04/16
				Milistone 04/29 - 05/03	Three Mile Island 04/21 - 04/25	Indian Point 3 04/25 - 04/29
BLAY	Indian Point 2 (Ingestica) (05/24 - 05/28		Three Mile Island 05/21 - 05/25	(North Anna) (05/13 - 05/17)	05/12 - 05/16	Beaver Valley 05/10 - 05/1
				Pilgrim 05/20 - 95/24		Milistone Ungestion) 05/24-05/28
JUNE	Three Mile Island 06/87 - 06/11	Seabrook Ongestion) 06/05 - 06/09		Beaver Valley 06/24 - 06/28	FitzPatrick 06/06 - 06/10	
		Beaver Valley 06/26 - 06/30				
JULY					(Serry) (Ingestion) (07/14 - 07/18)	
AUGUST	(Surry) (08/02 - 08/06		Ginna 08/27 - 08/31			
	Pilgrim Ongestion w Ri) 66/09 - 08/13					
SEPTEMBER	Limerick 09/20 - 09/24	Peach Bottom 09/11 - 09/15	Calvert Cliffs 09/24 - 09/28		Calvert Ciffs Ungestion) 09/08 - 09/12	Peach Bottom 09/13 - 09/17
OCTOBER	Oyster Creek 10/04 - 10/08	Indian Point 3 10/16 - 10/20	Oyster Creek 10/15 - 10/19	Sezbrock 10/21 - 10/25	Oyster Creek 10/06 - 10/10	
	FitzPatrick 10/16 - 10/22	SSES 10/30 - 11/03	Limerick 16/29 - 11/02			
	Calvert Cliffs 10/25 - 10/29					
MOVEMBER	Exercise Scheduling Mtg - FEMA I, MU 11/09 - 11/10		Verment Yankee 11/12 - 11/16	Peach Bottom 11/18 - 11/22	Limerick 11/63 - 11/07	Seabrook 11/15 - 11/19
	Ginna 11/15 - 11/19					
DECEMBEN	Pilgrim Engestion - MAJ 12/06 - 12/10	(Morth Anna) (12/04 - 12/08)	Nine Mile Point 12/03 - 12/07	Indian Point 2 12/09 - 12/13		(North Anna) (12/07 - 12/11)