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November 29, 2000
NMP1L 1558

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

RE:	Nine Mile Point Unit 1 Docket No. 50-220 <u>DPR-63</u>	Nine Mile Point Unit 2 Docket No. 50-410 <u>NPF-69</u>
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Subject: Oswego County and New York State Participation in the Nine Mile Point
Emergency Plan

Gentlemen:

By letter dated November 17, 2000 (NMP1L 1556), Niagara Mohawk Power Corporation (NMPC) submitted information describing emergency planning activities undertaken between Nine Mile Point (NMP), Oswego County, and New York State during the period between the required biennial exercises. In a subsequent telephone call with the Staff on November 20, 2000, NMPC was requested to provide additional detail regarding activities that are conducted to satisfy a commitment stated in an NMPC letter dated September 18, 1984. That commitment stated the following:

"Currently, the licensee that does not conduct the full participation emergency preparedness exercise with Oswego County conducts a partial participation exercise with the County and other off-site agencies, where specified aspects of the emergency plan are tested. This practice will continue under the new regulation."

The NRC found the above-quoted actions acceptable in their letter dated February 14, 1985. The "new regulation" referenced in the above-quoted statement was an amendment to Section IV, Paragraph F of 10 CFR 50 Appendix E, published in the July 6, 1984 Federal Register (49 FR 27733). Within this regulation, footnote 5 to Paragraph F (Training) defines the term "partial participation" as follows:

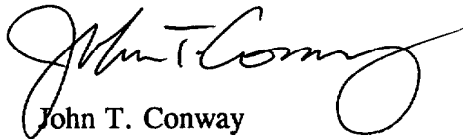
"5 "Partial participation" when used in conjunction with emergency preparedness exercises for a particular site means appropriate offsite authorities shall actively take part in the exercise sufficient to test direction and control functions; i.e., (a) protective action decision making related to emergency action levels, and (b) communication capabilities among affected State and local authorities and the licensee."

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Attachment A lists the exercises and drills conducted by NMPC over the last four years that have involved county and state authorities. The level of participation by the county and state during these exercises/drills fully satisfies both of the attributes identified in the 10 CFR 50 Appendix E definition for "partial participation" quoted above, and the frequency of exercise/drill performance exceeds the commitment stated in our September 18, 1984 letter. NMPC will continue to satisfy the September 18, 1984 letter commitment by conducting a biennial partial participation exercise/drill with the county and state authorities during the years that NMPC does not conduct the biennial full participation exercise.

Additionally, NMPC interacts with Oswego County and New York State Emergency Management personnel on a continuing and frequent basis. Examples of this interaction are listed in Attachment B. As noted during a telephone call with the Staff on November 22, 2000, the types of activities listed in Attachment B go beyond those strictly needed to comply with the regulations; as such, they are undertaken by NMPC to enhance emergency plan effectiveness.

Very truly yours,



John T. Conway
Vice President Nuclear Generation

JTC/DEV/cld
Attachments

xc: Mr. H. J. Miller, NRC Regional Administrator, Region I
Ms. M. K. Gamberoni, Section Chief PD-I, Section 1, NRR
Mr. G. K. Hunegs, NRC Senior Resident Inspector
Mr. P. S. Tam, Senior Project Manager, NRR
Records Management

Attachment A

Emergency Planning Exercises or Drills that Involve Oswego County and New York State Authorities - Past Four Years

Date of Exercise/Drill	Oswego County Participation	New York State Participation
09/24/1997 ¹	Full ²	Full ³
03/12/1998	Partial ⁴	Partial ⁵
07/01/1999	Partial ⁴	Partial ⁵
10/05/2000	Full ²	Partial ⁵

¹ 1997 Exercise included participation by the NRC Region Headquarters, including sending personnel to NMP Emergency Facilities.

² Includes complete activation, staffing, and participation by the following: Emergency Operations Center, Reception Center, Personnel Monitoring Center, Field Teams, Schools, Traffic Control Points, etc.

³ Includes complete activation, staffing, and participation by the following: State Emergency Operations Center, and State Emergency Management Office.

⁴ Partial participation includes: Protective action decision making related to Emergency Action Levels via participation in the Emergency Operations Facility with assistance from the Oswego County Dose Assessment group, and notification via Radiological Emergency Communications System (RECS) line for all classifications.

⁵ Partial participation includes notification via RECS line for all classifications.

Attachment B

Examples of Non-Exercise Interactions with Oswego County and/or New York State Emergency Management Personnel

- Annual Emergency Action Level refresher and dose assessment training (county and state)
- Annual hospital drills (county)
- Annual training of volunteer fire departments (county)
- Communications tests (monthly RECS test plus other tests at varying frequencies) (county and state)
- Annual full system siren tests (county)