



Federal Emergency Management Agency

Washington, D.C. 20472

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MEMORANDUM FOR: Glenn M. Tracy
Chief
Operator Licensing, Human Performance and
Plant Support Branch

FROM: *William B. Wark, m*
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Director
Chemical and Radiological Preparedness Division

SUBJECT: Emergency Preparedness at Nuclear Power Plant Sites with
Co-located Licensees

The FEMA rule 44 CFR 350 requires that a biennial exercise be conducted at each nuclear power plant site and that State and local governments fully or partially participate. The level of State participation depends on the number of nuclear power plant sites within the State, since State biennial full participation is rotated from site to site. The State partially participates at those sites where it is not fully participating. The difference between full and partial participation is that, for the latter, the deployment of State field monitoring teams is not required. Other critical exercise functions, such as mobilization, communication, dose projection and assessment, protective action recommendation and implementation, are required under FEMA REP-14: REP Exercise Manual, Section C, pages 2.1, 2.2. Local governments must fully participate in each biennial exercise except in the rare situation where they are within the 10-mile Emergency Planning Zone (EPZ) of more than one nuclear power plant. In this case, the local government(s) may seek some relief if a request is made to FEMA in writing.

The situations at Indian Point 2 and 3 and Nine Mile Point/Fitzpatrick, where there are two reactors at the site operated by two different licensees, has no effect on FEMA regulation since that regulation is aimed at State and local participation. At Indian Point 2 and 3 and Nine Mile Point/Fitzpatrick, alternating full participation biennial exercises has evolved with the two licensees at each site with no lessening of off-site emergency preparedness discerned. Therefore, FEMA would support a continuation of this approach with the expectation that the other activities conducted by the licensees and State and local personnel, as described in the licensees' letters and by representatives of the State, are maintained. FEMA strongly supports the relationships, including the interfaces that are ongoing in the State of New York, between the licensees and the State and local governments in the off years when a biennial exercise is not scheduled. These relationships provide for the contact and interfaces necessary to ensure a high level of preparedness through such continuity.

We look forward to working with you and your staff in clarifying the emergency preparedness regulations and developing guidance for situations where there are co-located licensees.

If you have any questions feel free to call me at (202) 646-3030.