

To: Collins, NRR  
Ref. G20000133



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Joan Claybrook, President

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June 12, 2000

Dr. William Travers  
Executive Director for Operations  
United States Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT: SUPPLEMENT TO THE 10 CFR 2.206 PETITION CONCERNING  
INDIAN POINT UNIT 2, DOCKET NO. 50-247**

Dear Dr. Travers:

It has come to our attention there are serious concerns within the Federal Emergency Management Agency regarding the adequacy of the emergency planning exercises. While these concerns potentially effect every reactor in the United States, we are particularly concerned with their impact upon emergency preparedness at the Indian Point 2 nuclear power plant.

In particular, we are concerned about the FEMA contractor analysis of Indian Point 2, which states that "Past EP drills and exercises did not adequately test the Emergency Response Organization in all aspects of their responsibilities." Furthermore, we are concerned with the contention in a FEMA memo that "the expanded use of granting exercise credit, and the possible increase of demonstrating REP functions and activities out-of-sequence from the exercise may have serious consequences." I have attached a copy of the FEMA memo for your consideration and to further support our petition regarding the use of Potassium Iodide in the vicinity of the Indian Point 2 nuclear power plant.

Additionally we wish to amend our petition to ask that the NRC not allow the Indian Point 2 nuclear reactor to restart unless and until the concerns identified in the FEMA memo are thoroughly addressed. According to the FEMA memo, the root causes of the emergency planning failures at Indian Point 2 were "unrealistic drills and the artificialities in the practice of new/existing procedures." In light of this fact, we are requesting that the NRC and FEMA re-evaluate the adequacy of the Indian Point 2 emergency planning drill and that a new, more realistic exercise be conducted.

Ralph Nader, Founder

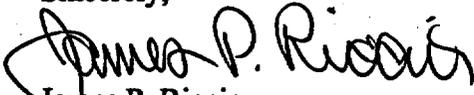
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Sincerely,



**James P. Riccio**  
**Public Citizen's Critical Mass Energy Project**

**David Lochbaum**  
**Union of Concerned Scientists**

**Michael Mariotte**  
**Nuclear Information & Resource Service**

**Ed Smeloff**  
**Pace University Law School Energy Project**



# Federal Emergency Management Agency

Washington, D.C. 20472

MAY 12 2000

PT-CR-RP

MEMORANDUM FOR:

Vanessa E. Quinn  
Acting Chief  
Radiological Emergency Preparedness Branch

Russell Salter  
Director  
Chemical and Radiological Preparedness Division

FROM:

William F. McNutt *Bill McNutt*  
Senior Policy Advisor  
Radiological Emergency Preparedness Branch

SUBJECT:

Preparedness Concerns at Indian Point 2

The following concerns are provided for your consideration:

The proposed expanded use of granting exercise credit, and the possible increase of demonstrating REP functions and activities out-of-sequence from the exercise may have serious consequences.

The root causes identified in the Indian Point 2 accident for failure in Emergency Preparedness (EP) were unrealistic drills and artificialities in the practice of new/existing procedures. The result was that, in this real incident, the State and locals could not respond to the continuous flow of information, nor could they integrate their response as needed. This could affect our assumptions about out-of-sequence demonstrations and the impact of granting credits and exempting exercise demonstration/evaluation.

Elaine Chan and I are concerned about the basis for FEMA's reasonable assurance finding that is issued on plan reviews, verification of resources and the results of an evaluated biennial exercise. Significant changes to the basis for FEMA's evaluation could result in challenges to the validity of FEMA's reasonable assurance findings on the adequacy of plans and preparedness, and that could shift the burden of proof from a challenger to FEMA.

In addition, the FEMA contractor analysis of Indian Point 2 states that "Past EP drills and exercises did not adequately test the Emergency Response Organization in all aspects of their responsibilities."

I have completed the work on the policy for expanding the use of exercise credit. However, I am seeking your advice in light of the Indian Point findings on how to proceed. If there are any questions on this matter, please contact me at x2857.