



# Federal Emergency Management Agency

Washington, D.C. 20472

To: Collins; NRR  
Ref. G20000133

JUN 20 2000

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

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Dear Dr. Travers:

I am writing this letter to explain the Federal Emergency Management Agency's (FEMA) position on a May 12, 2000, internal individual memorandum written by a member of the staff in the Radiological Emergency Preparedness (REP) Program. The memorandum, entitled "Preparedness Issues at Indian Point 2," was written by Mr. William F. McNutt, Senior Policy Advisor in the REP Program. In consideration of the number of questions raised, I want to provide for the record FEMA's official agency position on the memorandum and on the issues discussed by Mr. McNutt so there will be no misunderstanding or misinterpretation of FEMA's policies or finding for the Indian Point 2 Nuclear Power Plant.

As you are aware, FEMA recently completed a comprehensive strategic review of the REP Program. The intent of the review was to identify areas where the program could be improved or streamlined. Included in the results of the review were recommendations regarding the granting of exercise credit and the use of out of sequence demonstrations. Mr. McNutt's memorandum raises his own conceptual policy concerns regarding these two matters, and uses the February 2000 incident at Indian Point 2 to highlight his points.

In explaining the intent of his memorandum, Mr. McNutt informed his supervisor that he did not intend to suggest in any way that his concerns related to the offsite emergency preparedness reasonable assurance finding for Indian Point 2. Further, he stated that his reference to "past EP drills not adequately testing emergency preparedness" pertained solely to onsite emergency preparedness and not to offsite emergency planning and preparedness. In fact, the State of New York has never requested exercise credit for Indian Point 2, and out of sequence demonstrations have only been used on a limited basis. Neither of these issues appear to have been related to alert and notification of the public in the February 2000 incident at the plant.

There is also a reference in Mr. McNutt's memorandum to a FEMA contractor analysis of Indian Point 2. This analysis was not requested by FEMA; it was provided to REP Program staff on an informational basis by an individual who periodically serves as a contractor in the REP Program. I want to emphasize that the contractor was not acting in any way on behalf of FEMA or under FEMA's direction in securing or providing the analysis. The analysis provided information concerning onsite issues from the February 2000 incident that do not fall under FEMA's responsibilities to address.

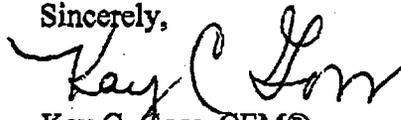
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Mr. McNutt clarified the intent of his May 12, 2000, memorandum in a subsequent memorandum to his supervisor on June 16, 2000. A copy is attached for your information and use. I hope that the attachment, along with this letter, will help to alleviate some of the concerns that have resulted from Mr. McNutt's memorandum.

In closing, I want to assure you that Mr. McNutt's May 12, 2000, memorandum was part of our normal internal discourse and exchange of professional views attendant to all of our policy formulations and does not convey in any way FEMA's official position on policy or on offsite emergency preparedness at Indian Point 2. I sincerely regret any confusion or misunderstanding created by this unfortunate incident and want to emphasize our desire to continue the close and positive working relationship we have always enjoyed with the U.S. Nuclear Regulatory Commission. I am also attaching, for your information, a copy of my letter to Mr. Edward F. Jacoby, Jr., Director, New York State Emergency Management Office, addressing this issue. If we can be of any further assistance, please do not hesitate to contact me at (202) 646-3487 or Mr. Russell Salter, Director, Chemical and Radiological Preparedness Division, at 202-646-3030.

Sincerely,



Kay C. Gross, CEM®  
Associate Director for Preparedness,  
Training, and Exercises

Enclosures



# Federal Emergency Management Agency

Washington, D.C. 20472

JUN 16 2000

MEMORANDUM FOR: Russell Salter  
Director  
Chemical and Radiological Preparedness Division

FROM: *Bill McNutt*  
Bill McNutt  
Senior Policy Advisor  
Chemical and Radiological Preparedness Division

SUBJECT: Purpose of my memorandum of May 12, 2000

This is intended to clarify any misunderstanding resulting from the public disclosure of the subject internal FEMA memorandum. The intent of my memorandum was to use the situation at Indian Point 2 as a basis for making a conceptual point on the "Streamlining" of FEMA's Radiological Emergency Preparedness (REP) Program.

FEMA's REP Program, which involves State, Tribal, and Local offsite response organizations, has been undergoing a programmatic review and streamlining process. My memorandum used the situation at Indian Point 2 to extrapolate in order to make a programmatic recommendation. That is, the Indian Point 2 utility was fulfilling all of its requirements for conducting periodic drills and exercises but still encountered some issues when coordinating its response to a real emergency. Thus, my recommendation was that FEMA should consider this in its offsite streamlining process.

The quote in my memorandum referred to an unsolicited report from an individual who periodically serves as a FEMA contractor. His report referred only to onsite activities. Consequently, my memorandum was not intended in any way to reflect the adequacy or inadequacy of plans and preparedness by the offsite response organizations. Results of FEMA's evaluation of REP exercises for Indian Point indicates that plans and preparedness are adequate to protect the public health and safety and I have no information to the contrary.



# Federal Emergency Management Agency

Washington, D.C. 20472

JUN 19 2000

Mr. Edward F. Jacoby, Jr.  
Director  
New York State Emergency Management Office  
1220 Washington Avenue  
Building 22, Suite 101  
Albany, New York 12226-2251

Dear Ed:

I am so glad that I was able to reach you on Friday to reassure you that I have only the utmost confidence in the emergency preparedness programs in the State of New York and the counties around the Indian Point Nuclear Power Plant. It was most unfortunate that an internal staff memorandum written to express a professional opinion on a policy issue currently under consideration in the Radiological Emergency Preparedness Program became available outside of FEMA and has been so widely misinterpreted and misunderstood. I want you to know that a memorandum of clarification has now been written that makes it clear that the staff member's original intent was not in any way meant to raise questions, either from FEMA or its contractors, about the adequacy of the offsite emergency plans and preparedness at Indian Point.

I am so sorry for all the consternation and anxiety that this issue has caused for you and others in the State of New York and counties around Indian Point. My biggest concern now is to repair any damage, resulting from this unfortunate incident, to the very close working relationship and partnership we have enjoyed with you over the years. I am confident you will continue to implement exemplary emergency preparedness programs in New York with the utmost professionalism, integrity, and dedication you have always demonstrated, always mindful of your first responsibility to protect the health and safety of the citizens of New York.

Sincerely,

A handwritten signature in cursive script, appearing to read "Kay C. Goss", is written over a circular stamp.

Kay C. Goss, CEM®  
Associate Director for Preparedness,  
Training, and Exercises

cc: Picciano

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FEDERAL EMERGENCY MANAGEMENT AGENCY  
500 C STREET, SW. WASHINGTON, DC 20472  
PREPAREDNESS, TRAINING, AND EXERCISES DIRECTORATE  
CHEMICAL AND RADIOLOGICAL PREPAREDNESS DIVISION  
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FACSIMILE TRANSMITTAL SHEET

TO: <u><del>D. Thacker</del></u>	FROM: <u>R. Salter</u>
COMPANY: <u>Fema</u>	DATE: <u>6-20-00</u>
FAX NUMBER: <u>301-415-2700</u>	TOTAL NO. OF PAGES INCLUDING COVER:
PHONE NUMBER:	SENDER'S PHONE NUMBER: <u>202 646 3050</u>
RE:	SENDER'S FAX NUMBER:

URGENT     FOR REVIEW     PLEASE COMMENT     PLEASE REPLY     PLEASE RECYCLE

NOTES/COMMENTS:

As we discussed .

R. Salter

FOR PETE ESEEL GLOTH