

July 18, 2000

Lisa Weldon
Planning and Coordination Branch
Operations and Planning Division
Federal Emergency Management Agency
500 C Street, S.W.
Washington, D.C. 20555

SUBJECT: DRAFT CONSEQUENCE MANAGEMENT GROUP OPERATIONS MANUAL

Dear Ms. Weldon:

This letter is in response to the letter of April 13, 2000 to the Catastrophic Disaster Response Group Members, on the above subject, from Lacy E. Suiter. The Nuclear Regulatory Commission (NRC) has comments in three areas of the Operations Manual. These comments are included below.

1. Page I-2: Reference is made here, and in several other sections, to the United States Government Interagency domestic Terrorism Concept of Operations Plan (CONPLAN). The NRC has only the October 1998 version of the CONPLAN. Without the most recent version of the CONPLAN, we may not have all the information necessary to review this Operations Manual.
2. It is not clear how much of the Consequence Management Response described in this Operations Manual, for example Figure I-3, is dependent upon a disaster declaration under the Stafford Act. This dependency, if it exists, should be clearly identified.
3. Page I-9, section 2. Deployment and Delivery: The FBI and FEMA individual statutory responsibilities are discussed here. The NRC has statutory responsibilities that are exercised as LFA during implementation of the Federal Radiological Emergency Response Plan (FRERP). The interface with FRERP is not clear for response to an incident with concurrent nuclear safety and safeguards issues. During such an incident, the nuclear safety issues may emerge first and/or be clearly dominant. During a FRERP response, the NRC may have already established a Joint Operations Center (JOC) before the safeguards issues are identified. The organization of this JOC would be very different from the FBI's JOC. The two JOCs would need to be consolidated in some manner.
4. Appendix C, Rosters and Contact Information: NRC will, when requested, assign members for the SIOC, DEST and JOC Consequence Management Groups on a case by case basis. The contact for these assignments is the NRC Operations Center at (301) 816-5100.

L. Weldon

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If you have questions or need additional information, please contact me at (301) 415-7476 or fjc@nrc.gov or Henry Bailey of my staff at (301) 415-7483 or hab@nrc.gov.

Sincerely,

(/RA by F. J. Congel)

Frank J. Congel, Director
Incident Response Operations

cc: L. Suiter, FEMA

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If you have questions or need additional information, please contact me at (301) 415-7476 or fjc@nrc.gov or Henry Bailey of my staff at (301) 415-7483 or hab@nrc.gov.

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Frank J. Congel, Director
Incident Response Operations

cc: L. Suiter, FEMA

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