Federal Emergency Management Agency
Region I
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Boston, MA 02109

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June 3, 2002

Stephen McGrail, Director
Massachusetts Emergency Management Agency
400 Worcester Rd.
Framingham, MA 01701

Dear Director McGrail:

This letter officially informs you of the Federal Emergency Management Agency's (FEMA) identification of two Deficiencies which occurred during the Pilgrim Nuclear Power Plant Radiological Emergency Preparedness exercise conducted on May 22, 2002. These issues were discussed with your staff at the post-exercise participants' briefing on May 29, 2002.

As a result of this Pilgrim Power Plant exercise, two deficiencies have been assessed in accordance with NUREG 0654 and FEMA-REP-14 page C.16-1. The Deficiencies are assessed against the State Emergency Operations Center (EOC) and the Field Team Coordinator at the Emergency Operations Facility (EOF).

The Deficiency being assessed against the State EOC is under Evaluation Area Sub-element 1.c, Direction and Control, Criterion 1.c.1. The Deficiency resulted from the State's failure to provide a verifiable means of communicating the Governor's decision to initiate a precautionary transfer of students at the Alert Classification. Schools within the EPZ did not receive notice to transfer students until between one and two hours after the decision had been made. While the transfer was initiated prior to any release of radioactivity, the lack of a procedure to notify communities by means other than a news release does not ensure that the precautionary transfer will be implemented when intended.

The Deficiency being assessed against the Field Team Coordinator at the EOF is under Evaluation Area Sub-element 3.b, Implementation of KI Decision, Criterion 3.b.1. The Deficiency resulted from the failure of the Field Team Coordinator to advise the Field Teams to ingest KI when the order came from the Massachusetts Department of Public Health Coordinator.

In accordance with 44 CFR 350.9 (d) and FEMA-REP-14, we have thoroughly reviewed and discussed these issues with FEMA Headquarters, the U. S. Nuclear Regulatory Commission, and FEMA Region I Radiological Assistance Committee members. FEMA-REP-14, page C.16-1, defines a Deficiency as "... an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant." Because of the potential impact of a Deficiency on the public health and safety, it should be corrected within 120 days after the exercise through appropriate remedial actions, including remedial exercises, drills, or other actions, including plan revisions.

Please coordinate with this office the date and time of the pertinent remedial actions and identity of the State and local participants within 10 days from the date of this letter.

Your cooperation on this matter is greatly appreciated. If you have any questions, please contact Dan McElhinney, Chairperson, Regional Assistance Committee, FEMA Region I, at (617) 223-9567.

Sincerely,

Daniel A. Craig
Regional Director