



# Federal Emergency Management Agency

Region I  
J.W. McCormack Post Office &  
Courthouse Building, Room 442  
Boston, MA 02109

NOV 7 2002

Donald P. Bliss, Director  
Division of Fire Safety & Emergency Mgmt  
Office of Emergency Management  
10 Hazen Drive  
Concord, NH 03305

Dear Mr. Bliss:

This letter officially informs you of the Federal Emergency Management Agency's (FEMA) identification of a Deficiency which occurred during the Exercise for Seabrook Nuclear Power Station conducted on October 23, 2002. The issue was discussed with your staff following the exercise.

As a result of this exercise, one deficiency has been assessed in accordance with NUREG 0654 and FEMA-REP-14 page C.16-1. The Deficiency is assessed against the Incident Field Office (IFO) under Evaluation Area Sub-element 3.b, Implementation of KI Decision, 3.b.1, KI and appropriate instructions are made available should a decision to recommend use of KI be made. The Deficiency resulted from the failure to properly communicate the order to ingest KI by emergency workers in local communities. The decision to "issue" KI was made at the State EOC. When it was received by the communities they called the IFO to clarify what was meant by "issue" KI, since KI had already been issued to emergency workers with their dosimetry in the event it was ordered later in the event. The IFO coordinator was not proactive in ensuring that all EPZ communities understood and complied with the intended directive to ingest KI.

In accordance with 44 CFR 350.9 (d) and FEMA-REP-14, we have thoroughly reviewed and discussed the issue 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, and in this case emergency workers, 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,

A handwritten signature in black ink, appearing to read "Dan Craig". The signature is written in a cursive, somewhat stylized font.

Daniel A. Craig  
Regional Director