

RS

**From:** John McGrath  
**To:** Holian, Brian  
**Date:** 3/13/03 9:01AM  
**Subject:** Updated questions

Attached is the revised Issues/questions on the Witt report. I included the quote from the Exec summary.

(RS)

D/10

Questions on the subject of Potential Releases (For NRR, NSIR, RES, RI discussion)

**Background:**

The final Witt report, Appendix K, states: (Complete reference is attached.)

In the Executive Summary to Appendix K "Results of the Comment Period," Witt makes the following comment: "We make no assertions that a terrorist attack would cause a faster or larger release." However, in the response to Comment 29 in the body of the appendix, Witt addresses the following issues:

Regarding the consequences of terrorist action at IP, Witt quotes NUREG-0654, Table 2 that a atmospheric release may begin as soon as 0.5 hours from the initiating event and that a major portion of a release may occur 0.5 hours after start of the release. Witt found that past exercises at IP "did not have a time release less than 3.5 hours" from the initiating event. Witt concluded "that portion of the planning basis was not being exercised."

Regarding size of release: Witt did not see evidence of consideration of wide variation in release, although reports do not contain detailed information of the size of the release. "Unless we can verify where the 'band' of exercise releases falls within the larger continuum of planning-basis accidents, we can not assume that there is coverage at the 'larger release' end of the scale."

Regarding the likelihood of a large release, Witt states that "In the absence of an industry independent consensus scientific position, we will continue to evaluate IP emergency preparedness on the basis that a large, rapid release of radiological material to the atmosphere is possible, and that a possible cause may be terrorism."

NRC response to Sen. Clinton, dated February 12, 2003 states:

- a) "While we appreciate and recognize the effort that went into the draft report we believe the draft report appears to give undue weight to the impact of potential acts of terrorism on emergency planning and preparedness."
- b) "Emergency preparedness exercises have invariably included large releases of radioactivity that occur shortly after the initiation of events."
- c) "Preliminary results from our vulnerability studies do not indicate an increased source term or quicker release from terrorist-initiated events than is already addressed by the emergency planning basis required by NRC regulations and in place at Indian Point."

**Questions:**

- 1) What kind of releases are envisioned in the sentence b) of the above excerpt from the Clinton letter?
- 2) What kind of releases are envisioned in sentence c) of the above excerpt from Clinton letter?
- 3) How are these releases related? In other words, are we testing, in normal EP exercises, for what could occur? What difference does it make? Are the probabilities for extreme releases

clearly low enough to justify only "studies"?

4) Are there any implications on the emergency planning basis? Zone? Etc. What is the basis of the 10 Mile EPZ? Do recent vulnerability studies change the basis/assumptions upon which the 10 mile EPZ was established?