

April 1, 2005

Ms. Mary Elizabeth Lampert  
148 Washington Street  
Duxbury, MA 02332

Dear Ms. Lampert:

Your petition dated January 18, 2005, to the Chairman of the Nuclear Regulatory Commission (NRC), has been referred to the Office of Nuclear Reactor Regulation (NRR) for response, pursuant to the NRC's regulations in Section 2.206 of Title 10 of the *Code of Federal Regulations* (10 CFR 2.206). In your letter, you asked that the Chairman require the Pilgrim Nuclear Power Station (PNPS) "to cease operations until proper notification equipment is installed throughout the Emergency Planning Zone to enable residents and transients to be notified within the required approximate 15 minutes." Your letter stated that the PNPS public warning system does not provide reasonable assurance that the residents and transients within the emergency planning zone will receive timely warning in the event of an accident resulting in a large release of radiation.

Our petition review board (PRB) met with you by teleconference on February 9, 2005. A transcript of that teleconference is enclosed. The PRB has reviewed your request and concluded that the issues you raise are not appropriately addressed under the 10 CFR 2.206 process, since no violations of NRC regulations could be substantiated and the information you provided is not sufficient to warrant further inquiry. Based on evaluations by the Federal Emergency Management Agency (FEMA) and the NRC's quarterly evaluations of siren reliability, the NRC finds reasonable assurance that the PNPS public notification system has the capability to essentially complete the initial notification of the public within the plume exposure planning zone within about 15 minutes. An enclosure to this letter provides the NRC staff responses to the specific concerns in your petition.

I hope this information is responsive to your concerns about the PNPS emergency notification systems. Thank you for bringing these concerns to the attention of the NRC.

Sincerely,

*/RA/*

J. E. Dyer, Director  
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: As stated

cc: See next page

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148 Washington Street  
Duxbury, MA 02332

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J. E. Dyer, Director  
Office of Nuclear Reactor Regulation

Docket No. 50-293

Enclosures: As stated

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**OFFICIAL RECORD COPY**

G20050032/LTR-05-0034: MARY ELIZABETH LAMPERT 2.206 - PILGRIM NUCLEAR  
POWER STATION

Dated: April 1, 2005

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Pilgrim Nuclear Power Station

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Pilgrim Nuclear Power Station

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NUCLEAR REGULATORY COMMISSION (NRC) STAFF RESPONSE

TO LETTER DATED JANUARY 18, 2005

FROM MS. MARY ELIZABETH LAMPERT

In your petition filed under Title 10 of the *Code of Federal Regulations* (10 CFR) Section 2.206, you stated that the emergency warning system at the Pilgrim Nuclear Power Station (PNPS) does not provide reasonable assurance that the residents within the 10-mile emergency planning zone (EPZ) will receive timely warning in the event of an accident. The Nuclear Regulatory Commission (NRC) staff's comments on your petition are as follows:

1. You stated that the PNPS public warning system cannot pass minimum standards of operability under 10 CFR 50, Appendix E, § (D), (E), and other applicable regulations. Your concern is that the warning sirens in the EPZ cannot be heard indoors and cannot be heard by citizens traveling in cars in the EPZ.

Response:

As discussed in 10 CFR 50.54(q), nuclear power plant licensees shall follow and maintain in effect emergency plans which meet the standards in 10 CFR 50.47(b) and the requirements in 10 CFR 50, Appendix E. In accordance with 10 CFR 50.47(b)(5), the emergency response plan must establish "means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone" (i.e., 10-mile EPZ). In 10 CFR Part 50, Appendix E, details are provided on the content of emergency plans needed to demonstrate compliance with the standards described in 10 CFR 50.47(b). With regard to prompt public notification, Section IV.D.3 of Appendix E provides a design objective of having "the capability to essentially complete the initial notification of the public within the plume exposure pathway EPZ within about 15 minutes." In the Statements of Consideration for the final emergency planning regulations (45 FR 55402; August 19, 1980) the Commission recognized that not every individual would necessarily be reached by actual operation of such a system under all conditions of system use, but that the provision of such systems would significantly improve the capability for taking protective actions in the event of an emergency.

Federal oversight of radiological emergency planning and preparedness associated with commercial nuclear facilities involves both the Federal Emergency Management Agency (FEMA) and the NRC. Consistent with President Carter's directive in December 1979 and the longstanding memorandum of understanding between FEMA and the NRC, FEMA takes the lead in reviewing and assessing offsite planning and response (including public notification) and in assisting State and local governments, while the NRC reviews and assesses the onsite planning and response. Using FEMA's input, the NRC then makes a determination on the overall state of emergency preparedness.

Regulatory Guide 1.101, "Emergency Planning and Preparedness for Nuclear Power Reactors," Revision 4, July 2003, states that the criteria and recommendations in Revision 1 of NUREG-0654/FEMA-REP-1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980, are methods acceptable to the NRC staff for complying with the standards in 10 CFR 50.47. NUREG-0654/FEMA-REP-1 is a joint publication of the NRC and FEMA. NUREG-0654/FEMA-REP-1, Appendix 3, Section C.3, provides the following standards for siren systems:

- a) An acceptable criteria at most locations would be a sound level from the siren system of 10 decibels (db) above average daytime ambient background.

- b) The maximum sound levels received by any member of the public should be lower than 123 db, the level which may cause discomfort to individuals.
- c) The 10 db differential above daytime ambient is meant to provide a distinguishable signal inside of average residential construction under average conditions. Where special individual cases require a higher alerting signal, it should be provided by other means than a generally distributed acoustic signal.

The PNPS Emergency Plan states: "Development of this plan was based on NRC Regulatory Guide 1.101 ... and NUREG-0654/FEMA-REP-1...." The NRC has previously reviewed the PNPS Emergency Plan and FEMA's findings regarding the State and local plans (including the capability for prompt public notification) and concluded that the plans meet all regulatory requirements.

The public alerting system for PNPS uses 112 radio-controlled sirens that provide coverage of the 10-mile EPZ around the plant. Each siren is tested at least once a month to prove they are operable. They provide adequate sound levels to meet the design criteria for the emergency alerting system. They can be quickly activated by local officials when needed to alert citizens to listen to an emergency broadcast station for further instructions. The NRC staff has concluded that the siren system at PNPS fulfills the NRC and FEMA requirements for an emergency alerting system. Your petition did not identify any special individual cases that require a higher alerting signal. The monthly tests are performed as "silent tests", which actuate the sirens at a frequency inaudible to the human ear. The sirens contain performance-monitoring circuitry, which allows an evaluation of each siren's performance during the monthly tests. Full-volume tests of the sirens are conducted annually, and the public is notified prior to the test. The last full-volume test was conducted in November 2004.

- 2. You stated that Pilgrim's sirens have been unreliable, failing 12 times from January 2000 to January 2004.

Response:

The NRC's reactor oversight program has a performance indicator specifically for siren failures during the planned monthly test. This performance indicator is updated each calendar quarter and is publicly available on the NRC's Web site. For the fourth quarter of 2004, the pass rate for siren tests at PNPS was 99 percent. The NRC's reactor oversight program considers a siren test pass rate above 94 percent to be performance that lies in the licensee response band and requires no additional NRC inspection beyond the agency's baseline inspection. A siren amplifier problem was discovered during a maintenance test at PNPS in January 2004. Although the design criteria specified the sirens must remain operable in the temperature range of -22 EF to 149 EF, some siren amplifiers were not actuating at temperatures below about 20 EF. Each siren may have from two to five amplifiers. During a maintenance test in January 2004, with temperatures lower than 20 EF, 85 of the 112 sirens had a malfunction of at least one amplifier. Testing indicated that the amplifiers functioned correctly above 20 EF. The licensee identified the problem and took corrective action by replacing those amplifier circuit boards which had temperature-sensitive components due to improper manufacturing. As the maintenance test was not the planned monthly test, the failures did not count toward the NRC's performance indicator. The NRC is satisfied that the performance indicator data for siren testing was collected as required by the NRC and that the sirens at PNPS are now operating reliably. The NRC will continue to monitor their performance through the reactor oversight program.

- 3. You stated that route notification, whereby police or other public workers alert citizens in areas where sirens failed to actuate by the use of public address systems or bullhorns, may not accomplish the task effectively or in a timely manner.

Response:

Your assessment of the deficiencies of the route alerting process assumed failure of most, if not all, of the 112 sirens in the EPZ. The NRC and FEMA consider this to be an unlikely assumption. The PNPS sirens have batteries which permit full-volume activation even if there is an electrical blackout. A more realistic assumption would be the failure of three or four sirens. FEMA monitors periodic exercises of the route alerting system and FEMA's latest assessments for PNPS indicate the system meets its design objectives.

In summary, based on FEMA's evaluations and the NRC's quarterly evaluations of siren reliability, the NRC finds reasonable assurance that the PNPS public notification system has the capability to essentially complete the initial notification of the public within the plume exposure planning zone within about 15 minutes. If you believe the Federal requirements for sound levels or for the design of emergency alerting systems need to be revised, please submit a petition for rulemaking to the NRC as described in 10 CFR 2.802, or to FEMA as described in 44 CFR 1.18. Additional information on submitting a petition for rulemaking is available on the NRC's Web site, [www.nrc.gov](http://www.nrc.gov).

**Official Transcript of Proceedings**  
**NUCLEAR REGULATORY COMMISSION**

Title:                   Petition Review Board  
                                  Pilgrim Power Station

Docket Number:       50-293

Location:                (teleconference)

Date:                     Wednesday, February 9, 2005

Work Order No.:        NRC-238

Pages 1-21

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Enclosure 2

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

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PETITION REVIEW BOARD (PRB)

CONFERENCE CALL

+ + + + +

WEDNESDAY

FEBRUARY 9, 2005

+ + + + +

The conference call was held, Jim Lyons,  
Petition Review Board Chairman, presiding.

PETITION REVIEW BOARD:

JIM LYONS, Chairman, Deputy Director,

Division of Licensing, Project Mgmt/NRR

HERBERT N. BERKOW, Project Director, DLPM/NRR

DONNA M. SKAY, 2.206 Petition Coordinator

PETITIONER:

MARY ELIZABETH LAMPERT, Duxbury, Massachusetts

1 NRC HEADQUARTERS STAFF:

2 MELISSA DUFFY, Office of General Counsel

3 CORNELIUS HOLDEN, Project Director at One in

4 NRR, DLPM

5 DARRELL ROBERTS, Section Chief, NRR Project

6 Director at One, Section 2

7 DEBRA SCHNEK, Emergency Preparedness,

8 FEMA Coordinator

9 STEVE LaVIE, Emergency Preparedness

10 NRC STAFF PRESENT FROM REGION I:

11 CLIFF ANDERSON, Projects Branch Chief

12 BOB FRETZ, Petition Manager, DLPM/NRR

13 FEMA HEADQUARTERS STAFF:

14 RUSSELL GATES, Engineer

15 MIKE TAKACS

16 ANN TUNORIAL

17 FEMA REGION I STAFF:

18 DEBRA BELL

19 ROBERT POOLE

20 JIM GIBBONS

21 WATD/FM, Marshfield, Massachusetts

22 SARA LAVOIE, Reporter

P-R-O-C-E-E-D-I-N-G-S

(time not provided)

MS. SKAY: We'll go ahead and get started.

My name is Donna Skay, and I'm the NRC's 2.206  
Petition Coordinator.

The first thing I'd like to do is just go  
around and have everybody introduce themselves. This  
call will be recorded and transcribed, so it would be  
a big help if when everybody introduces themselves if  
you can spell your last name, for those outside the  
NRC.

PARTICIPANT: Will you be sending me a  
copy of the transcript?

MS. SKAY: It will be made publicly  
available as an attachment to a letter that's being --

PARTICIPANT: Oh, okay.

MS. SKAY: It'll probably take about two  
weeks.

MR. HOLDEN: This is Cornelius Holden.  
I'm Project Directorate One in NRR, NRC Headquarters.

MR. ROBERTS: Darrell Roberts, Section  
Chief, NRR Project Directorate One, Section 2,  
Headquarters.

MS. DUFFY: I'm Melissa Duffy. I'm an attorney  
with the Office of General Counsel at Headquarters.

1 MS. SCHNEK: Debra Schnek, Emergency  
2 Preparedness, Headquarters.

3 MR. BERKOW: Herb Berkow, NRR, PRB Member.

4 MR. LaVIE: Steve LaVIE, Emergency  
5 Preparedness, Headquarters.

6 MR. LYONS: I'm Jim Lyons. I'm the Deputy  
7 Director of the Division of Licensing Project  
8 Management, at NRR.

9 MS. SKAY: All right. Would NRC Region I  
10 like to introduce themselves?

11 MR. ANDERSON: Yes. This is Cliff  
12 Anderson, Region I, Projects Branch Chief.

13 MS. SKAY: Other NRC staff?

14 MR. FRETZ: Yes. This is Bob Fretz, NRR,  
15 Petition Manager. Last name is spelled F-R-E-T-Z.

16 MS. SKAY: All right. How about FEMA?  
17 Who do we have from FEMA on the line?

18 MR. GATES: Russell Gates, FEMA  
19 Headquarters, Engineer.

20 MR. TAKACS: Mike Takacs, FEMA  
21 Headquarters. That's T-A-K-A-C-S.

22 MS. TUNORIAL: Ann Tunorial, FEMA  
23 Headquarters.

24 MS. BELL: Debra Bell, FEMA Region I.

25 MR. POOLE: Bob Poole, FEMA Region I.

1 MR. GIBBONS: Jim Gibbons, FEMA Region I.

2 MS. SKAY: Okay. And Mary?

3 MS. LAMPERT: Mary Lampert, Duxbury,  
4 Massachusetts. It's L-A-M-P as in Peter E-R-T.

5 MS. SKAY: Okay. Anybody else on the  
6 line?

7 MS. LAVOIE: Hi. I'm Sara Lavoie from  
8 WATD/FM in Marshfield, Massachusetts. I'm a reporter.

9 MS. SKAY: Okay. I think that's  
10 everybody.

11 I will turn the meeting over now to Jim  
12 Lyons.

13 MR. LYONS: Good afternoon. My name is  
14 Jim Lyons, and I'm the Chairman of the 2.206 Petition  
15 Review Board, often referred to as the PRB. So if we  
16 slip into acronyms, you'll know what we're talking  
17 about. I'll try not to do that.

18 The subject of today's conference is to  
19 discuss a letter submitted by Ms. Mary Elizabeth  
20 Lampert dated January 18, 2005. In this letter, Ms.  
21 Lampert requested that the NRC take enforcement action  
22 and require that the Pilgrim Nuclear Power Station  
23 cease operations until proper notification equipment  
24 is installed throughout Pilgrim's Emergency Planning

1 Zone, to enable residents and transients to be  
2 notified within the required approximate 15 minutes.

3 The letter raises a number of concerns  
4 about the public warning system or sirens, stating  
5 that the sirens are difficult to hear, especially  
6 during those times when windows are closed. In  
7 addition, the letter also raises concerns about the  
8 past reliability of the sirens, as well as other  
9 issues such as route notification.

10 The purpose of this teleconference is to  
11 give the Petitioner an opportunity to provide  
12 additional information relating to the petition. This  
13 is also an opportunity for the NRC staff and the  
14 Licensee, who is not on the call, to ask any  
15 clarifying questions. However, the purpose of this  
16 teleconference is not to debate the merits of the  
17 petition.

18 The Petition Review Board will meet  
19 following this phone call internally to make a  
20 determination of whether to accept this petition in  
21 the -- into the 2.206 process.

22 The teleconference is being transcribed,  
23 so it will be helpful if anyone making a statement  
24 first state their name clearly. The transcript will

1 become a supplement for the petition and will be made  
2 publicly available, as Donna noted earlier.

3 We request that the Petitioner keep any  
4 opening remarks to about 30 minutes, so that we can  
5 move along expeditiously.

6 Finally, the NRC will issue an  
7 acknowledgement letter to the Petitioner to document  
8 the actions the NRC will take regarding her  
9 January 18th letter, including a schedule for these  
10 actions. The Petition Manager, who is Bob Fretz, will  
11 periodically keep the Petitioner and the Licensee  
12 informed of the progress of the NRC staff's review.

13 So with that, I'd like to turn the meeting  
14 over to you, Ms. Lampert, to provide us any additional  
15 information you'd like.

16 MS. LAMPERT: Yes. First of all, I'll go  
17 through the petition, if you have it in front of you.

18 MR. LYONS: Yes.

19 MS. LAMPERT: The reason I am filing the  
20 petition is -- goes a little further than you  
21 introduced the subject. You suggested that it was  
22 difficult to hear the sirens. The petition is under  
23 most circumstances you cannot hear the sirens. That's  
24 why it's an important distinction.

1 I'm filing this petition in hopes that the  
2 NRC will enforce its regulation. The regulation is,  
3 as you know, that the public should be notified within  
4 an approximate 15 minutes. Obviously, you appreciate  
5 the fact that this is very important, because  
6 radiation is an invisible hazard. Therefore, for  
7 residents, for transients, to know there's a problem  
8 and to know what they should do about it, they have to  
9 be notified/informed.

10 To be informed, that's a two part. First,  
11 the message has to go out, and, as importantly, it has  
12 to be received by the intended recipients. And so  
13 this is a petition largely focused on the latter, that  
14 it is not received.

15 And so the question then becomes: why?  
16 It's very obvious that we need to be notified, because  
17 it's a regulation, and an obvious one.

18 What we have here in the EPZ for  
19 notification essentially are sirens. The sirens  
20 themselves are important to notify people who happen  
21 to be outdoors. And I can assure you, I don't sleep  
22 outdoors, my computer isn't set up outside, nor are  
23 there open markets for shopping and business.

24 We live in a climate, as such, that the  
25 houses and buildings on the whole are well insulated.

1 This is also a semi-rural bedroom-type community,  
2 which is the case for many of -- throughout the EPZ of  
3 Pilgrim, and that means many of the houses are in  
4 wooded areas, they're on sizable lots, set back from  
5 the street, with landscaping, all of which minimizes  
6 the effects of sound.

7 Not to add the fact that specific  
8 geographic features, such as the fact that many of the  
9 communities have forested areas, water bodies, whether  
10 they be ponds, bogs, bays, inlets. Some areas are  
11 hilly, particularly in the Plymouth area. There are  
12 meteorological conditions where -- my house is on the  
13 water. I'm looking at Pilgrim right now across the  
14 bay. And so there is the factor of wind, wind speed  
15 direction, temperature, all of which affects, as you  
16 know, sound intensity.

17 So the long and short of it is that when  
18 I am in my house, knowing that the sirens are going to  
19 be tested and, therefore, listening for them, I can't  
20 hear them. I live at 148 Washington Street. The  
21 closest siren to the north is at 39 -- just about 390  
22 Washington Street, which is six-tenths of a mile away.  
23 That's -- I was trying to estimate it in my car --  
24 setting it. I hope I set it properly. Going in the

1 other direction, you're about four-tenths of a mile.  
2 Now, that's listening for it.

3 Also, that is the same situation at  
4 31 Deer Path Trail in the western part of Duxbury, 725  
5 Long Pond Road in Plymouth, and, naturally, I could  
6 provide other addresses for you. But I don't think  
7 it's my responsibility to run a poll.

8 The point is: I cannot hear the sirens  
9 when I'm indoors, and I'm indoors the majority of the  
10 time. And in the summertime, we have the air  
11 conditioning on. And this is common, and notification  
12 means notifying everyone, so everyone can hear it, not  
13 only those who are outside.

14 Secondly, it's very important, as you  
15 know, to have a backup system. Token sirens have been  
16 unreliable, as you know, and it is important to have  
17 redundancy.

18 Our backup system is route notification,  
19 and that is that resident -- local emergency  
20 responders are supposed to go around in their vehicles  
21 with bullhorns, or if they have a PA system, and alert  
22 those people where the sirens didn't work.

23 Now, this is foolishness. It's  
24 foolishness, number one, because for the same reasons  
25 that you can't hear the sirens, you are unlikely to

1 hear the bullhorns. Secondly, there are too many  
2 roads and too few emergency responders. Duxbury, for  
3 example, has 127.54 miles of road. Plymouth has 521  
4 miles of road. And so that clearly speaks for itself.

5 Obviously, too, if the emergency  
6 responders -- the police, for example, DPW, fire --  
7 are out on their fool's errands trying to notify  
8 people, who is going to perform the functions and  
9 duties that they are supposed to be performing?

10 Also, it's important to recognize that if  
11 you are driving along your major highways -- for  
12 example, I had to go to a hearing in Plymouth -- in --  
13 down the Cape last night, and I was driving down Route  
14 3.

15 Hello? Is everybody there?

16 MR. LYONS: Yes.

17 MS. SKAY: Yes, we're still here.

18 MS. LAMPERT: Oh, okay, because I had  
19 heard -- I guess it was on my -- my end.

20 I would not have heard a siren, even if I  
21 could have seen a siren anywhere. And transients  
22 aren't necessarily likely to have one of the two  
23 stations on in their automobile or truck or what have  
24 you to receive notification.

1           The point is that technology exists today  
2           so that the regulation can in fact be satisfied. This  
3           was pointed out, for example, by James Lee Witt in his  
4           analysis, his review of emergency preparedness at  
5           Indian Point and Millstone that he did at the request  
6           of the Governor of New York.

7           He stated, "Reverse 911," which is another  
8           word for rapid dialing systems, "is a community  
9           alerting system that rapidly places phone calls with  
10          a pre-recorded message containing important alert  
11          information," which he discusses on page 114. And  
12          that is the obvious solution to this problem.

13          That way we know, for example, let's say,  
14          2003, I spoke with Sigma Corporation, which has  
15          Reverse 911 -- that's their trademark system -- that  
16          their mass call at that point, and they could expand  
17          it, was 3,333 calls per minute with a 20-second  
18          message.

19          Also, DCC -- Dialogic Communications  
20          System -- has a small system in place at the Plymouth  
21          County Sheriff's Department, and they are capable,  
22          with just 500 phones, of making 1,000 calls a minute.

23          So the point is, the technology is there.  
24          Not having confidence that the NRC was going to  
25          enforce their own regulations, I have been trying for

1 three years to solve the problem myself. But we  
2 shouldn't be in a situation of what I call "the little  
3 red hen" approach to public safety.

4 I have gone before the Board of Selectman  
5 in the Town of Duxbury asking if they can find money  
6 for a rapid dialing system for the town, and then  
7 hopefully integrate it obviously into MIMA, so the  
8 notification to begin the notification would be in  
9 place. The funds weren't there.

10 We then went to the Plymouth County  
11 Sheriff's Department, because he had the former  
12 Sheriff McDonough -- Joe McDonough had gotten a grant  
13 which Entergy has supplemented with some funds for a  
14 rapid dialing system. However, their rapid dialing  
15 system solely is for emergency responders, and they do  
16 not have the money for the general public.

17 The Town of Duxbury signed, you know,  
18 supporting statements to go after other grants --  
19 didn't work out -- asking the Board -- asking the town  
20 at an annual town meeting this year to purchase reader  
21 boards, but, again, for the Town of Duxbury.

22 Now, you know, this is -- this is a  
23 patchwork approach. And while talking about reader  
24 boards, they are important. First, you need the  
25 sirens for an outdoor warning system. Then, rapid

1 dialing for people who are indoors, which are the  
2 majority of the people the majority of the time,  
3 because of the New England weather and the fact that  
4 we no longer sleep in tepees.

5 Third, reader boards showed that those who  
6 are in transit on the road can be notified. You  
7 wouldn't need a lot, but obviously some.

8 The advantage of the supplemental systems  
9 are, first, it allows the NRC to enforce their  
10 regulation -- number one -- actually protect public  
11 safety. Number two, reverse -- these rapid dialing or  
12 reverse 911 systems have been tested, they're in  
13 place, the city of Chicago, Richmond, 10 years ago had  
14 them, and they are multi-purpose and can be used for  
15 a variety of emergency systems situations. And, as  
16 importantly, they can give an alert to everybody,  
17 which is necessary, and there can be subsequent calls  
18 to sub-areas.

19 And as an emergency would develop, and  
20 roads become totally clogged, and you'd like to tell  
21 people, "Forget it," you know, and have more of a  
22 phased evacuation, or to use alternate routes, it can  
23 be used for that sort of situation.

24 Also, the reader boards, like the reverse  
25 911 are multi-purpose, can be used for a variety of

1 emergency situations. So in saying that, it seems  
2 particularly appropriate that these be rapidly put  
3 into place, it's doable, the technology is there, the  
4 requirement can be satisfied, and how important -- it  
5 has always been important, but post 9/11 it is  
6 particularly important that we pay attention and that  
7 money be spent on the key elements -- and notification  
8 is a key element -- in emergency planning.

9 And particularly, I'm focused on Pilgrim,  
10 but, hey, it's the same across the board -- that  
11 Pilgrim is a BWR, MARK I, it has a densely packed  
12 spent fuel pool high up in the main reactor building,  
13 flimsy roof overhead, vulnerable from three sides. So  
14 no matter what, that's a real event to get into all of  
15 that.

16 When the regulations for emergency  
17 planning went into play at the Three Mile Island, it  
18 was recognized that you need notification, notifying  
19 not only those who happen to be outside but also  
20 notifying those who are inside. And the sirens, let's  
21 face it, are not going to do it, because if they were  
22 loud enough to get -- to notify people inside the  
23 houses and buildings in communities like this with air  
24 conditioning, set back, trees, blah, blah. Then, they

1 had to be so bloody loud that you'd blow the ears out,  
2 hurt the hearing of those outside.

3 So in essence, that's what I'm saying, we  
4 have -- I haven't got exact figures, but that's your  
5 job. I think there are about 31,601 households in the  
6 EPZ of Pilgrim. That excludes Marshfield, because I  
7 don't have the figures for the number of households,  
8 only for the total town and only a segment -- a small  
9 portion of Marshfield is in the EPZ, and I don't know  
10 the number of businesses. But that's your job, and  
11 it's something that can be done quite readily.

12 And last, I think an important thing is  
13 that the public starts to regain confidence in the  
14 Nuclear Regulatory Commission as an agency that is  
15 working for the public safety and intends to enforce  
16 regulations. That would be beneficial for the agency,  
17 and, in the big view, it would certainly be beneficial  
18 for the industry, because if the public feels  
19 confident that the right things are happening they are  
20 less fearful of this type of technology.

21 That's in essence what I have to say. The  
22 point is, I've tried to hear them, and I can't hear  
23 them.

24 MR. LYONS: Hello. This is Jim Lyons  
25 again. Well, thank you very much for that good

1 summary of your issue and working -- going through  
2 your concerns and -- and, you know, it gives us a  
3 little bit more than what was in the original 2.206  
4 petition.

5 I guess with that, I'd look here in this  
6 room here at Headquarters, NRC Headquarters, to see if  
7 there are any questions that we would want to ask of  
8 Ms. Lampert. I don't think we have any questions  
9 here. What about the regions? Does the region -- NRC  
10 Region have any questions?

11 PARTICIPANT: No questions here in  
12 Region I.

13 MR. LYONS: Okay. And does anybody either  
14 at Headquarters or FEMA Region, do you have any  
15 questions, or would you like to get clarified on -- on  
16 Ms. Lampert's statement?

17 PARTICIPANT: Nothing from FEMA  
18 Headquarters, sir.

19 MS. BELL: FEMA Region I has no questions.

20 MR. LYONS: Okay. Other than that, I  
21 guess, again, I want to thank you for -- for providing  
22 your -- the information. I think it helps us  
23 understand exactly what your concerns are and what  
24 you're asking us to do.

1                   And, Ms. Lampert, unless you have anything  
2 else you want to provide to us, I would think that we  
3 --

4                   MS. LAMPERT: No, not really. I mean, my  
5 problem -- my issue is the requirement is not being  
6 satisfied. Period. And it must be satisfied. I'm  
7 not out there to try to figure out how you're going to  
8 -- how the Licensee should pay for it, or what have  
9 you.

10                   In reality, however, I would add this --  
11 that, clearly, you must be talking -- all of you --  
12 with Homeland Security.

13                   MR. LYONS: Okay. And --

14                   MS. LAMPERT: And it's something, when  
15 you're talking about the -- really, the two fixes, I  
16 outlined the problem, and said there are solutions --  
17 reader boards, they're -- you know, reader boards,  
18 they're solar-powered, they're not (inaudible), and  
19 the rapid -- some rapid dialing system, so people can  
20 be called.

21                   MR. LYONS: Okay. All right.

22                   MS. LAMPERT: So I would think Homeland  
23 Security has -- has money, they're diddling around  
24 with grants, you're doing this, you're doing that. I  
25 would think in partnership you all could come up with

1 how this could be put in place, because it -- it's  
2 something that's multi-purpose and it would be helpful  
3 for a variety of emergency situations.

4 MR. LYONS: Okay. And just for a point of  
5 clarification, FEMA is part of the Department of  
6 Homeland Security.

7 MS. LAMPERT: Yes, that's right. They're  
8 part of Homeland Security now. And so --

9 MR. LYONS: And we have contact with them  
10 and with other --

11 MS. LAMPERT: I mean, it's a total no-  
12 brainer.

13 MR. LYONS: -- Homeland Security to  
14 discuss all the security issues.

15 MS. LAMPERT: A total no-brainer. It's  
16 doable. It's been tested. It's out there. And it is  
17 2005, and I can't hear the sirens.

18 MR. LYONS: Okay. All right. Well,  
19 again, thank you very much for your -- for your  
20 comments and for your clarifications.

21 And I want to thank the NRC Region and  
22 FEMA Regional and Headquarters people for  
23 participating with that call. And with that --

1 MS. LAMPERT: Right. And you underlined  
2 the inappropriate -- the inaccurate characterization  
3 in the introduction.

4 MR. LYONS: Yes.

5 MS. LAMPERT: Difficult to hear is not the  
6 case. Impossible.

7 MR. LYONS: Okay. All right.

8 MS. LAMPERT: Okay. It was great. Nice  
9 talking to you all, and I look forward to this being  
10 resolved, and then we're all in a better place.

11 MR. LYONS: Okay. Well, thank you very  
12 much.

13 MS. LAMPERT: Great. Bye-bye.

14 MR. LYONS: Good-bye.

15 (Whereupon, the conference call was  
16 concluded.)

17

18