

V. Nine Mile Point 3 Draft Requests for Additional Information

RAI Number	Request for Additional Information	RAI For
NMP-001	<p>Subject: Written Agreements Basis: NUREG-0654 Evaluation Criterion A.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County REPP, Appendix N, <i>Letters of Agreement</i>, contains the titles and effective dates for letters of agreement between Oswego County and 37 other organizations. Appendix N does not include the most current dates for LOAs. Thirty five letters were provided for review. The LOA with the SCPA is out of date and the LOA with Onondaga County is about to expire. Please provide the current dates for all LOA and the LOAs with the SCPA, Onondaga County Palmero Volunteer Fire Department and A&E Transport.</p> <p>B. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan (RERHP) does not include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones as required by Criterion A.3.</p> <p>The Onondaga County RERHP, Appendix E, <i>Supporting Organizations Letters of Agreement List</i>, contains the titles and effective dates for letters of agreement between Onondaga County and six other organizations. Three of these letters appear to be out of date. On two others the effective dates are indeterminate. A notation indicates these letters are on file at the Onondaga County Emergency Management Office. Provide information about written agreements between the Onondaga County and Federal, State, and local agencies.</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>
NMP-002	<p>Subject: Resources and Facilities to the Support Federal Response Basis: NUREG-0654 Evaluation Criterion C.1.c SRP ACCEPTANCE CRITERION: Requirement H</p>	<p>State: New York</p> <p>County: None</p>

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	<p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan (REPP) does not provide a description of State resources available to support the Federal response as required by Criterion C.1.c.</p> <p>The New York State REPP, Appendix D, <i>Resources and Facilities to Support the Federal Response</i>, of the New York State REPP contains no information about State resources available to support the Federal Response Provide information about the State resources available to support the Federal response (i.e., use of airfields, telephones, radio communications). Describe facilities and equipment that may be made available to Federal response personnel. Indicate the locations of these facilities.</p>	
NMP-003	<p>Subject: Letters of Agreement Basis: NUREG-0654 Evaluation Criterion C.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County REPP, Appendix N, <i>Letters of Agreement</i>, contains the titles and effective dates for letters of agreement between Oswego County and 37 other organizations. Appendix N does not include the most current dates for LOAs. Thirty five letters were provided for review. The LOA with the SCPA is out of date and the LOA with Onondaga County is about to expire. Please provide the current dates for all LOA and the LOAs with the SCPA, Onondaga County Palmero Volunteer Fire Department and A&E Transport.</p> <p>B. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan (RERHP), Appendix E, <i>Supporting Organizations Letters of Agreement List</i>, contains the titles and effective dates for LOAs between Onondaga County and six other organizations. Three of these letters appear to be out of date. On two others the effective</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>

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	<p>dates are indeterminate. A notation indicates these letters are on file at the Onondaga County Emergency Management Office. Provide copies of up-to-date letters of agreement and memorandums of understanding.</p>	
NMP-004	<p>Subject: Security Events and Emergency Classification Levels Basis: NUREG-0654 Evaluation Criterion D.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County REPP, Procedures A and Q, do not include security events resulting from hostile actions as part of its definition of ECLs including Alert, SAE, and GE. Provide information about how security events resulting from hostile actions are incorporated into ECLs.</p> <p>B. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan, including implementing procedures, does not include security events resulting from hostile actions as part of its definition of ECLs including Alert, SAE, and GE. Provide information about how security events resulting from hostile actions are incorporated into ECLs.</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>
NMP-005	<p>Subject: Emergency Actions for Security Related Events Basis: NUREG-0654 Evaluation Criterion D.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan (REPP) does not specify actions to be taken in response to a hostile action at NMP3NPP that result in the declaration of an Alert, Site Area Emergency (SAE), or General Emergency (GE). Provide information about actions to be taken in response to hostile actions at NMP3NPP that result in the declaration of an Alert, SAE, or GE.</p> <p>B. Oswego County</p>	<p>State: New York</p> <p>County: Oswego Onondaga</p>

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	<p>The Oswego County REPP, including implementing procedures, does not specify actions in response to a hostile action at NMP3NPP that result in the declaration of an Alert, SAE, or GE. Provide information about actions to be taken in response to hostile actions at NMP3NPP that result in the declaration of an Alert, SAE, or GE.</p> <p>C. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan (RERHP), including implementing procedures, does not specify actions to be taken in response to a hostile action at NMP3NPP that result in the declaration of an Alert, SAE, or GE. Provide information about actions to be taken in response to hostile actions at NMP3NPP that result in the declaration of an Alert, SAE, or GE.</p>	
NMP-006	<p>Subject: Emergency Operations Center Basis: NUREG-0654 Evaluation Criterion H.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County Radiological Emergency Preparedness Plan does not include a facility description of Oswego County's Emergency Operations Center (EOC). Please provide a facility description of the Oswego County EOC.</p> <p>B. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan does not include a facility description of the Onondaga County's EOC. Please provide a facility description of the Onondaga County EOC.</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>

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NMP-007	<p>Subject: Maps of Radiological Sampling and Monitoring Points Basis: NUREG-0654 Evaluation Criterion J.10.a SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County Radiological Emergency Preparedness Plan does not include maps identifying the locations relocation centers in host areas and shelter areas as required by Criterion J.10.a. Provide maps of the relocation centers in host areas, and shelter areas.</p>	<p>State: None</p> <p>County: Oswego</p>
NMP-008	<p>Subject: Distribution and Storage of Potassium Iodide (KI) Basis: NUREG-0654 Evaluation Criterion J.10.e SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. New York State</p> <p>A.1. The New York State Radiological Emergency Preparedness Plan (REPP) lacks details on replacement of expired drugs or the use of extension letters to extend the shelf life of the KI.</p> <p>B. Oswego County</p> <p>B.1. The Oswego County REPP does not include details on the distribution of KI to the general public. A reference is made to the Oswego County KI Plan, but it is not contained in the Oswego County REPP. Also there are no references to replacement and/or extension of KI when it expires. Provide information regarding distribution of KI to the public and for replacement/extension of KI.</p> <p>B.2. The Oswego REPP, Procedure C, <i>Health and Radiological Specialist, Attachment 2, Instructions for Radiation Field Monitoring Teams, Section 3.2.2, Precautions and Limitations</i>, states that a KI bottles are in dosimetry kits. However, in Procedure M, <i>Radiological Survey Instruments and Dosimetry: Inventory, Maintenance and Calibration, Attachment 1, Radiological Field Monitoring Team Kit Inventory</i>, it lists that a kit contains four KI tablet packages. Provide clarification as to what form and</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>

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	<p>amount of KI is available in dosimetry kits.</p> <p>C. Onondaga County.</p> <p>The Onondaga County Radiological Emergency Response Host Plan does not include discussion about the replacement of KI and details on who provides KI to Onondaga County. Provide information about who is responsible for providing and replacing KI stored in Onondaga County.</p>	
NMP-009	<p>Subject: Evacuation Locations for Onsite Personnel Basis: NUREG-0654 Evaluation Criterion J.10.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Nine Mile Point/JA Fitzpatrick Nuclear Facility Development of Evacuation Time Estimates, Appendix J, <i>Summary of Evacuation Time Estimates and Evacuation Time Graphs</i>, presents the ETEs for two-mile, five-mile, and EPZ boundary for all 14 scenarios and all Emergency Response Planning Areas. ETEs for schools (Table 8-7) and transit dependents (Table 8-8 and Table 8-9) are also presented. ETEs for special facilities are not included. Provide ETEs for special facilities. Provide ETEs for special facilities.</p>	<p>State: None</p> <p>County: Oswego</p>
NMP-010	<p>Subject: Reading of Dosimeters and Maintenance of Dose Records Basis: NUREG-0654 Evaluation Criterion K.3.b SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>A.1. The Oswego County REPP does not address the process by which the results from reading the permanent record dosimeters will be retained as a record. Provide a description of the process for used for processing and maintaining the dose records generated for each individual when the permanent record dosimeters are sent in and read.</p> <p>A.2. The process for integrating the dose from external</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>

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	<p>exposure as read on the permanent record dosimeters with the estimated internal dose received by emergency workers to produce a final record of dose for each worker is not described in the Oswego County REPP. Provide a description of the process for integrating the dose from external exposure with the estimated internal dose received to produce a final record of emergency worker's TEDE.</p> <p>B. Onondaga County</p> <p>B.1. The Onondaga County Radiological Emergency Response Host Plan (RERHP) does not address the process by which the results from reading the permanent record dosimeters will be retained as a record. Provide a description of the process for used for processing and maintaining the dose records generated for each individual when the permanent record dosimeters are sent in and read.</p> <p>B.2. The process for integrating the dose from external exposure as read on the permanent record dosimeters with the estimated internal dose received by emergency workers to produce a final record of dose for each worker is not described in the Onondaga RERHP. Provide a description of the process for integrating the dose from external exposure with the estimated internal dose received to produce a final record of emergency worker's TEDE.</p>	
NMP-011	<p>Subject: Inconsistent use of terms and units for exposure and dose equivalent Basis: NUREG-0654 Evaluation Criterion K.4 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>A.1. The Oswego County Radiological Emergency Preparedness Plan (REPP), Procedure C, <i>Health and Radiological Specialist</i>, Sections 4.7.6.2, 5.7.6.2, and 6.6.2.6 instruct the Field Team Supervisor to notify the County Radiological Specialist or County Director of Public Health via the Field Team Coordinator if a field team member's absorbed dose has reached or exceeded the Oswego County dose</p>	<p>State: None</p> <p>County: Oswego</p>

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	<p>limits for emergency workers listed in Attachment 1 to Procedure C. Attachment 1 provides exposure limits in terms of roentgens, which is the proper unit for use with the direct-reading dosimeters (DRDs) that are provided to the field team members. The Procedure C sections identified above should be corrected to read “exposure” in place of “absorbed dose”. Provide clarification of the quantities and associated units measured by the DRDs issued to the Oswego County Radiological Field Measurement Teams.</p> <p>A.2. The Oswego County Procedure C <i>Health and Radiological Specialist</i>, Attachment 1, Section 5 identifies a 25 R Total Effective Dose Equivalent (TEDE) Federal dose limit. This should be stated as a 25 rem TEDE, and should be calculated based not only upon the exposure given by the worker’s self-reading dosimeter, but should also include an estimate of the affected worker’s internal dose received up to that point. Provide clarification about the units used to report the TEDE limit.</p>	
NMP-012	<p>Subject: Specification of Action Levels for Decontamination Basis: NUREG-0654 Evaluation Criterion K.5.a SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Oswego County</p> <p>The Oswego County Radiological Emergency Preparedness Plan (REPP), Section C.5.f, <i>Emergency Personnel Radiological Exposure Control</i>, states that the County Director of Public Health and the County Radiological Specialist are responsible for establishing procedures for decontamination of exposed emergency personnel and equipment. No reference to an action level for identifying contamination is provided. Provide the Oswego County Personnel Monitoring Center procedure or other plans or procedures that document the action level for decontamination.</p>	<p>State: None</p> <p>County: Oswego</p>

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NMP-013	<p>Subject: Statement Indicating Responsibility for Activating Facility/Services in General Emergency Basis: NUREG-0654 Evaluation Criterion L.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. Onondaga County</p> <p>The Onondaga County Radiological Emergency Response Host Plan, Procedure 1, <i>Onondaga County Division of Emergency Management, Section 2.2.3.3, Actions Taken by the OCCEM at Each Emergency Classification Level, Alert or Site Area Emergency</i>, states that upon notification of an Alert or Site Area Emergency, the Onondaga County Commissioner of Emergency Management (OCCEM) or his designee will be responsible for the activation of Facility/Services and will place Upstate Medical Center Hospital on standby, if required. This notification action is not contained in Section 2.3 as a responsibility under General Emergency (GE). Provide information describing who is responsible for the activation of Facility/Services, including the placement of Upstate Medical Center Hospital on standby, if required and not already done so as part of a previous action, following the declaration of a GE.</p>	<p>State: None</p> <p>County: Onondaga</p>
NMP-014	<p>Subject: Listing of Facilities Capable of Receiving Radiologically Contaminated Injured Patients Basis: NUREG-0654 Evaluation Criterion L.3 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan, Appendix F, <i>MS-1 Hospital Listing</i>, does not include facilities in contiguous States capable of receiving radiologically contaminated injured persons. Provide information about facilities in contiguous states capable of receiving radiologically contaminated injured persons.</p>	<p>State: New York</p> <p>County: None</p>
NMP-015	<p>Subject: Post-Accident Exposure and Dose Limits Basis: NUREG-0654 Evaluation Criterion M.1 SRP ACCEPTANCE CRITERION: Requirement H</p>	<p>State: New York</p> <p>County:</p>

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	<p>A. New York State</p> <p>A.1. The New York State REPP does not reference an exposure limit or turn-back value for persons entering the restricted area if self-reading dosimetry will be provided to them. Provide information about exposure limits and/or turn-back values for persons entering the restricted area.</p> <p>A.2. The Oswego County REPP does not reference an exposure limit or turn-back value for persons entering the restricted area if self-reading dosimetry will be provided to them. Provide information about exposure limits and/or turn-back values for persons entering the restricted area.</p>	None
NMP-016	<p>Subject: Training for Those Responsible for Planning Basis: NUREG-0654 Evaluation Criterion P.1 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan (REPP), Procedure F, contains no set requirements, equivalencies or credentialing addressed initially or on a recurrent basis for an individual, who has the responsibility for the planning effort, nor is what areas are considered appropriate training. Provide the requirements, equivalencies or credentialing for personnel responsible for the planning effort.</p> <p>B. Oswego County</p> <p>The Oswego County REPP, does not address specifically those responsible for the planning effort, nor lay out the training requirements on a table or matrix for those responsible for the planning effort. Procedure L lists general subject matter areas, but does not address specific initial subject areas for individuals responsible for the planning effort, recurrent subject matter is not covered, nor training certification or credentialing. Provide the training requirements including subject matter, training certification and credentialing for those personnel involved in the planning effort.</p>	<p>State: New York</p> <p>County: Oswego Onondaga</p>

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	<p>C. Onondaga</p> <p>The Onondaga County REPP, Procedure 8, <i>Training</i>, list of personnel broadly encompasses personnel and individuals responsible for the planning effort in Section 2.1.1, but infers there are other emergency response personnel needed to implement the plan. The matrix in Procedure 8 gives minimal reasonable guidance for the OCCEM to use to select personnel responsible for the planning effort for training. Provide the training requirements including subject matter, training certification and credentialing for those personnel involved in the planning effort.</p>	
NMP-017	<p>Subject: Incorrect NUREG-0654 Evaluation Criteria Cross References Basis: NUREG-0654 Evaluation Criterion P.8 SRP ACCEPTANCE CRITERION: Requirement H</p> <p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan (REPP), Appendix H, <i>Cross Reference Index to the Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants</i>, includes a number of references to sections of the plan that are not applicable to NUREG-0654 Evaluation Criteria. Provide a revised Appendix H with corrections made as appropriate.</p> <p>B. Onondaga</p> <p>The Onondaga County Radiological Emergency Response Host Plan (RERHP), Appendix K, <i>Evaluation Criteria Cross Reference Index for NRC/FEMA Concurrence in Local Government Radiological Emergency Response</i>, includes a number of references to sections of the plan that are not applicable to NUREG-0654 Evaluation Criteria. Provide a revised Appendix K with corrections made as appropriate.</p>	<p>State: New York</p> <p>County: Onondaga</p>
NMP-018	<p>Subject: Quarterly Updating of Maps Basis: NUREG-0654 Evaluation Criterion P.10 SRP ACCEPTANCE CRITERION: Requirement H</p>	<p>State: New York</p> <p>County:</p>

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	<p>A. New York State</p> <p>The New York State Radiological Emergency Preparedness Plan (REPP), Procedure A, <i>Plan Maintenance</i>, does not address the updating of maps on a quarterly basis, as required by GM PR-1. Provide information indicating the frequency at which maps are to be updated for New York State.</p> <p>B. Onondaga</p> <p>The Onondaga County Radiological Emergency Response Host Plan (RERHP), Procedure 7, <i>Document Review, Revision and Control</i>, does not address the updating of maps on a quarterly basis, as required by GM PR-1. Provide information indicating the frequency at which maps are to be updated for Onondaga County.</p>	Onondaga

