

**INTERIM FINDING REPORT  
FOR REQUESTS FOR ADDITIONAL INFORMATION**

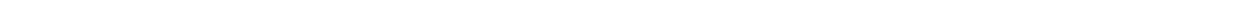
on the Adequacy of Offsite  
Radiological Emergency Response Planning and Preparedness  
for the  
Nine Mile Point 3 Nuclear Power Plant  
Scriba, New York

June 12, 2009

Prepared by the  
Federal Emergency Management Agency  
National Preparedness Division  
Technological Services Branch  
Region II  
New York, New York

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## *Executive Summary*

On September 30, 2008, Nine Mile Point Nuclear Project, LLC and UniStar Nuclear Operating Services, LLC (UniStar) submitted a Combined License Application (COL) to the U.S. Nuclear Regulatory Commission to construct and operate Nine Mile Point 3 Nuclear Power Plant (NMP3NPP) facility located in Oswego County, New York, approximately 5 miles northwest of Oswego, New York, on the shores of Lake Ontario. Part 5 of the COL application contained the proposed NMP3NPP Combined License Application Emergency Plan.

The Nine Mile Point Nuclear Station, which is outside of Syracuse in Oswego, New York, has two boiling-water reactors. Unit 1 is a 609 MW reactor that entered service in 1969 and Unit 2 is a 1,148 MW reactor that began operation in 1988. The 900 acre (3.6 km<sup>2</sup>) site is also occupied by the Fitzpatrick Nuclear Generating Station.

The COL application's supplemental information included the existing Radiological Emergency Preparedness Plans (REPPs) from the State of New York (dated April 2009) and Oswego County (dated May 2009), as well as the Radiological Emergency Response Host Plan (RERHP) from Onondaga County (dated August 2007). It also included the Evacuation Time Estimate (ETE) report prepared by KLD Associates, Inc., dated August 2003.

The materials listed above were the basis for the review. NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," amended March 2002, and its Supplements, the Interim REP Program Manual, dated August 2002, current FEMA guidance documents, and established industry practices were considered in making the determination as to the plans' adequacy.

The review of the offsite emergency plans resulted in evaluation findings for all of the planning standards and associated criteria contained in NUREG-0654/FEMA-REP-1, Rev. 1, as amended, that are ORO responsibilities. Each planning standard and criterion was rated as:

- Adequate: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
- Adequate – corrections must be made: Plans are adequate but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).
- Inadequate: Plans are inadequate and cannot be implemented until they are revised to corrected deficiencies noted in the Federal review.
- N/A: The planning standard is not applicable to offsite response organizations.

The initial review resulted in the following interim evaluation findings (ratings for each individual criterion are summarized in Section IV, Technical Review Composite Rating Summary):

- Planning Standard A: Adequate – corrections must be made
- Planning Standard B: N/A
- Planning Standard C: Adequate – corrections must be made
- Planning Standard D: Adequate – corrections must be made
- Planning Standard E: Adequate

- Planning Standard F: Adequate
- Planning Standard G: Adequate
- Planning Standard H: Adequate
- Planning Standard I: Adequate
- Planning Standard J: Adequate – corrections must be made
- Planning Standard K: Adequate – corrections must be made
- Planning Standard L: Adequate – corrections must be made
- Planning Standard M: Adequate
- Planning Standard N: Adequate
- Planning Standard O: Adequate
- Planning Standard P: Adequate – corrections must be made

Adequacy of the NMP3NPP COL Application Emergency Plan review for OROs is also dependent on:

- Satisfactory resolution of the above evaluation results that are “adequate – corrections must be made.”
- An adequate demonstration of the completion of the COL Application Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria as it relates to OROs.
- Satisfactory demonstration of plan implementation during a joint exercise with the licensee and state and local governments, as described in 44CFR350.9, and utilizing NMP3NPP facilities.

## ***I. Introduction***

### ***A. General Characteristics of the Nine Mile Point 3 Nuclear Power Plant***

The NMP3NPP site is located in Oswego County, on the south shore of Lake Ontario, in the Town of Scriba. It is seven miles northeast of the City of Oswego, and 36 miles northwest of Syracuse. It is an area of 1,500 acres and contains three operating Boiling Water Reactors (BWRs): Nine Mile Point Units 1 and 2 and James A. FitzPatrick Nuclear Power Plant.

Metropolitan centers nearest the site are the city of Oswego, New York, approximately seven miles southwest; city of Fulton, New York, approximately 14 miles south; Syracuse, New York, approximately 36 miles southeast; Rochester, New York, approximately 80 miles west; and Buffalo, New York, approximately 135 miles west. Aside from these urban areas, the area is sparsely populated, consisting primarily of woodlands and swamps.

### ***B. Emergency Response Organization***

The New York State Emergency Management Office (SEMO), as the staff arm of the New York State Disaster Preparedness Commission (DPC) and its Chairman, is responsible for developing, implementing, and maintaining comprehensive emergency plans and procedures for prompt reactions to potential emergencies at nuclear power plants in New York or in bordering states. However, the affected counties have lead responsibility for carrying out emergency activities unless a "State Declaration of Disaster Emergency" is declared.

The DPC shall initiate the activation of State monitoring, assessment and evaluation personnel, equipment, and resources. The Commissioner of Health will then recommend protective action options on these evaluations. The DPC Chair/designee will coordinate the State resources needed to implement the protective action option and insure their continuity. State resources will supplement local resources in carrying out the necessary response activities to meet these option requirements. In those instances where a county does not have the capability to implement all or part of its Radiological Emergency Preparedness Plan (REPP), or the Chief Executive of a county does not elect to put such a plan into effect, State agencies under the direction of the DPC will implement the county's plan using State and local resources and personnel.

The New York State Department of Health (DOH) assists local health agencies, provides laboratory services, and maintains monitoring equipment. The DOH provides radiological capabilities and operates a Statewide Radiation Surveillance Network, which collects environmental samples to establish and monitor long-term. The SEMO has limited radiological capabilities and receives meteorological information which may be used to assist the DOH in the assessment and evaluation of a radiological emergency. The New York State Department of Environmental Conservation can also provide equipment and manpower to assist in monitoring the environment.

The Oswego County Director of Emergency Management (CDEM), as directed by the Chairman of the County Legislature, has primary responsibility for emergency response. It is the responsibility of the county to provide resources (equipment and personnel) for the effective implementation of the protective action response options required to protect the health, safety and property of the general public and emergency workers, in the event of a radiological release at NMP3NPP.

Onondaga County will support Oswego County in responding to a radiological emergency at NMP3NPP by activating and operating a reception center and congregate care centers. This includes operating radiological monitoring, decontamination and registration of evacuees.

### ***C. Plans***

The *New York State Radiological Emergency Preparedness Plan for Commercial Nuclear Power Plants* includes the basic plan as well as the organization concepts and polices and establishes the assignments of emergency responsibilities for radiological emergencies. The appendices and procedures also include operational concepts for specific emergency responsibilities for State departments.

The Oswego County Radiological Emergency Preparedness Plan (REPP) and Onondaga Radiological Emergency Response Host Plan (RERHP) contain the county's concept of operations and policies. The appendices and procedures assign emergency responsibilities to local government agencies.

The following plans were reviewed:

- *New York State Radiological Emergency Preparedness Plan for Commercial Nuclear Power Plants*, April 2009;
- *Oswego County Radiological Emergency Preparedness Plan*, March 2009;
- *Oswego County Potassium Iodide (KI) Plan*, May 2009
- *Onondaga Radiological Emergency Response Host Plan*, August 2007;
- *Joint Information Center Procedures, Public Education Work Plan, Nine Mile Point*, July 2008;
- Oswego County Letters of Agreement;
- Onondaga County RERHP, Procedure 3, *Radiological Monitoring and Decontamination*, August 2007; and
- *Nine Mile Point/JA FitzPatrick Nuclear Facility Development of Evacuation Time Estimates*, KLD Associates, Inc., Commack, New York, August 2003.

### ***D. Basis for Findings***

The status of emergency preparedness for offsite response to possible incidents resulting from an accident at the NMP3NPP has been determined based on review of the plans cited above.



Adequacy of the reviewed plans is dependent upon:

- Incorporation of proposed plans into the existing emergency response plans.
- Evaluation of the NMP3NPP Evacuation Time Estimate (ETE) study and acceptance of proposed Emergency Response Planning Areas (ERPA).
- Satisfactory resolution of the evaluation results that are “adequate – corrections must be made.”
- Satisfactory resolution of the evaluation results that are “inadequate.”
- An adequate demonstration of the completion of the COL Application Emergency Planning Inspections, Tests, Analyses, and Acceptance Criteria as it relates to OROs.
- Satisfactory demonstration of plan implementation during a joint exercise with the licensee and state and local governments, as described in 44 CFR 350.9, and utilizing NMP3NPP Unit 3 facilities.

### ***E. Evaluation Format***

In accordance with the FEMA/NRC Memorandum of Understanding<sup>1</sup> FEMA agreed to furnish assessments, findings and determinations as to whether State, Tribal and local emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, and resources, staffing levels and qualification and equipment adequacy). These findings and determinations are used by NRC under its own rules in connection with its licensing and regulatory requirements and FEMA supports its findings in the NRC licensing process and related court proceedings.<sup>2</sup>

NUREG-0654/FEMA-REP-1, Rev. 1, *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants*, November 1980, is the guidance used to review plans and to develop this Interim Finding Report.

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<sup>1</sup> 44 CFR 353 Appendix A, June 17, 1993

<sup>2</sup> 44 CFR 350.3(e)

***II. Review and Evaluation of Emergency Preparedness Plans and Procedures for the NMP3NPP Against the Planning Standards of NUREG-0654/FEMA-REP-1, Rev. 1, as amended.***

The following discussion presents the results of the review and evaluation for each planning criterion. A total of 109 criteria were evaluated. 99 criteria were found to be adequate, and 11 criteria were found to be adequate but requiring additional information or minor corrections. No criteria were designated as inadequate.

**Rating Categories:**

**Adequate:** The statements and concepts in the plan adequately meet the intent of the planning criterion. Recommendations for consideration may be provided.

**Adequate – Corrections Must Be Made:** Plans are adequate, but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).

**Inadequate:** The statements and concepts in the plan do not adequately address the planning criterion.

**N/A – Not Applicable:** The planning criterion is not applicable to the organization/documents under review and is not required to be addressed in these documents. The planning criterion has to be addressed elsewhere in the plan.

**N/R: Not Reviewed**

- A. *Assignment of Responsibility (Organization Control) Planning Standard: Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zone have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.***

**A. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet all but one of the evaluation criteria under Planning Standard A in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of all nine evaluation criteria are addressed in the plans. However, corrections are needed to fully address all aspects of the planning standard. The plans provided for review did not adequately meet Criterion A.3

Each plan identifies the organizations that are intended to be part of the overall response [A.1.a]; specifies the concept of operations of those organizations and their relationship to the total effort [A.1.b]; illustrates these interrelationships in a block diagram [A.1.c]; identifies the specific individual (by title) who is in charge of the emergency response [A.1.d]; and provides for 24-hour per day emergency response including the manning of communications links [A.1.e]. The individual responsible for assuring continuity of resources is specified, by title, in the County plans [A.4]. In addition, each plan specifies the functions and responsibilities for major elements and key individuals and summarizes this information in a table showing primary and support responsibilities for each agency [A.2.a]. Each plan contains the legal basis for the authorities detailed in the plan [A.2.b].

The plan material addressing Criterion A.3 is Adequate – corrections must be made. 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 must be provided in an appendix to the plans. Alternatively, the plans may contain descriptions of the emergency measures to be provided, the criteria for the implementation of the written agreements, and the arrangements for exchange of information.

The Oswego County REPP, Appendix N, *Letters of Agreement*, 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. The Onondaga County RERHP, Appendix E, *Supporting Organizations Letters of Agreement List*, 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. However, these letters were not provided for review. [RAI NMP-001]

The plan material addressing Criterion A.4 is Adequate. Each organization must have the capability of continuous (24-hour) operations for a protracted period. In addition, each organization shall identify the individual responsible for assuring continuity of resources. The New York State REPP states that the State Emergency Management Office staffs the State Emergency Communications Center on a 24-hour basis and includes provisions for State agencies and other organizations to assure continuity of resources and support continuous (24-hour) operations for a protracted period.

To become fully compliant with the Planning Standard A, information must be provided to address item detailed above for Criterion A.3.

**C. *Emergency Response Support and Resources Planning Standard: Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the Licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.***

**C. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet five of the six evaluation criteria under Planning Standard C in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of all six evaluation criteria are addressed in the plans. However, corrections are needed to fully address all aspects of the planning standard. The plans provided for review did not adequately meet Criteria C.1.c and C.4.

The plan material addressing Criterion C.1.a is Adequate. The New York State Governor and the New York State Commissioner of Health are authorized to request Federal assistance [C.1.a]. Oswego County will defer to the State to request Federal assistance. This criterion is not applicable to Onondaga County.

Federal resources and expected arrival times are specified in the New York State Radiological Emergency Preparedness Plan (REPP) [C.1.b]. The county plans are not required to address this criterion.

The plan material addressing Criterion C.1.c is Adequate. The New York State REPP identifies specific resources to be provided to support the Federal response. The New York State REPP, Appendix D, *Resources and Facilities to Support the Federal Response*, of the New York State REPP contains information about State organizations with resources available to support the Federal Response. The two county plans identify New York State as having this responsibility. The Oswego County REPP provides a description of local resources available to support the Federal response.

In accordance with Criterion C.2.a, the New York State REPP and the Oswego County REPP state that following declaration of an Alert, a Site Area Emergency or a General Emergency, State and county representatives will be deployed to the Emergency Operations Facility.

The plan material addressing Criterion C.3 is Adequate. The New York State REPP includes a description of the capabilities of the Wadsworth Center Inorganic and Nuclear Chemistry Laboratory and a general description of in-state and out-of-state laboratories. All laboratories listed are approved by the Environmental Laboratory Accreditation Program. The county plans are not required to address this criterion.

The plan material addressing Criterion C.4 is Adequate – corrections must be made. The State of New York, Oswego County and Onondaga County identify nuclear and other facilities relied upon in an emergency for assistance. The New York State REPP, Appendix E, *New York State List of Letters of Agreement or Memorandums of*

*Understanding*, contains a list of letters of agreement or memorandums of understanding for four nuclear power plants located in New York. A notation indicates copies are on file at the State Emergency Coordination Center (ECC). Copies were provided for review.

The Oswego County REPP, Appendix N, *Letters of Agreement*, 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. The Onondaga County Radiological Emergency Response Host Plan 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 C.4. [RAI NMP-003]

To become fully compliant with the Planning Standard C, information must be provided to address item detailed above for C.3.

***D. Emergency Classification System Planning Standard: A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by the facility licensees for determinations of minimum initial offsite response measures.***

**D. Evaluation: Adequate – corrections must be made.**

The plans provided for review do not fully meet the two evaluation criteria under Planning Standard D in NUREG-0654/FEMA-REP-1, Rev. 1. Elements of both evaluation criteria are addressed in the plans. However, corrections are needed to fully address all aspects of the planning standard. The plans provided for review did not adequately meet Criteria D.3 and D.4

The plan material addressing Criterion D.3 is Adequate – corrections must be made. The emergency classification schemes the Oswego County REPP, and the Onondaga County Radiological Emergency Response Host Plan (RERHP) are not entirely consistent with the emergency classification scheme provided by the applicant [D.3]. Specifically, the Oswego County REPP in Procedures A and Q, and the Onondaga County RERHP do not include security events resulting from hostile actions as part of the definition of the emergency classification levels (ECLs), while the applicant's emergency plan does include security events resulting from hostile actions. [RAI NMP-003]

The plan material addressing Criterion D.4 is Adequate – corrections must be made. New York State, Oswego County, and Onondaga County provide procedures that identify some emergency actions to be taken that are consistent with the emergency actions of the Nuclear Facility Operator. [D.4] The New York State REPP specifies actions that will be taken in response to the declaration of an ECL that is driven by a hostile action. The Oswego County REPP and Onondaga County RERHP, including implementing procedures, do not specify actions that will be taken in response to the declaration of an ECL that is driven by hostile actions. This is inconsistent with the emergency actions in applicants plan. [RAI NMP-004]

To become fully compliant with the Planning Standard D, information must be provided to address item detailed above.

***E. Notification Methods and Procedures Planning Standard: Procedures have been established for notification, by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow-up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.***

**E. Evaluation: Adequate.**

The plans provided for review meet all of the evaluation criteria under Planning Standard E in NUREG-0654/FEMA-REP-1, Rev. 1.

Procedures are established in the New York State Radiological Emergency Preparedness Plan (REPP), Oswego REPP and the Onondaga County Radiological Emergency Preparedness Host Plan (RERHP) that describe the notification by the appropriate entity of the offsite response organizations consistent with the emergency classification [E.1].

In accordance with evaluation Criterion E.2, the New York State and Oswego REPPs and the Onondaga RERHP state that procedures have been established for alerting, notifying, and mobilizing emergency response personnel.

Per evaluation criterion E.5, the New York State and Oswego REPP provide a system for disseminating appropriate information to the public. Procedures for identifying these individuals and for notifying them of an accident and providing them with appropriate information are included in the plans as required by GM-24, *Radiological Emergency Preparedness for Handicapped Persons*, April 5, 1984. This criterion is not applicable to Onondaga County.

New York State and Oswego County have established administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone [E.6]. This criterion is not applicable to Onondaga County.

The State of New York Site Joint News Center Workplan/Procedure and Oswego County have sample messages prepared for public dissemination [E7]. The draft messages give instructions with regard to specific protective actions to be taken by occupants of affected areas. Messages include the appropriate aspects of sheltering, ad hoc respiratory protection, e.g., handkerchief over mouth, thyroid blocking or evacuation. This criterion is not applicable to Onondaga County.



***F. Emergency Communications Planning Standard: Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.***

**F. Evaluation: Adequate**

The plans provided for review meet all of the seven evaluation criteria under Planning Standard F in NUREG-0654/FEMA-REP-1, Rev. 1.

The communications plans for emergencies are addressed in the New York State Radiological Emergency Preparedness Plan (REPP), Oswego REPP, and Onondaga County Radiological Emergency Response Host Plan (RERHP). There is a provision for 24-hour per day notification [F.1.a]; a provision for communications with contiguous State/local governments within the emergency planning zones [F.1.b]; a provision for communications with Federal emergency response organizations [F.1.c]; and a provision for communications between Nuclear Facility Operator and the State and local Emergency Operations Centers and radiological monitoring teams [F.1.d].

The New York State REPP, Procedure B, *Communications/Warning*, contains Attachment 3B as a diagram of the Radiological Emergency Communication System.

A provision for alerting and activating emergency personnel in each response organization is addressed [F.1.e]. A coordinated communication link for fixed and mobile medical support facilities exists for the State and Counties [F.2].

The plan material addressing F.3 is Adequate. New York State, Oswego County, and Onondaga County plan to conduct periodic testing of the entire emergency communications system. SEMO SECC participates twice daily communications tests with NAWAS at the Federal level and at the local level to selected counties. SEMO also conducts twice daily communications tests with the NWS.

- G. *Public Education and Information Planning Standard: Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.***

**G. Evaluation: Adequate**

The plans provided for review meet all of the seven evaluation criteria under Planning Standard G in NUREG-0654/FEMA-REP-1, Rev. 1.

New York State and Oswego County have provisions for a coordinated periodic (at least annual) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency [G.1]. Information is provided to the permanent and transient populations located in the plume Emergency Response Zone. Updated information is provided annually [G.2]. Each plan designates a point of contact and the Joint Information Center (JIC) for use by the news media during an emergency [G.3.a]. New York State and Oswego County have each designated a spokesperson that will have access to all necessary information. [G.4.a]. New York and Oswego County have established arrangements for the timely exchange of information among designated spokespersons [G.4.b]. Coordinated arrangements for dealing with rumors are provided. New York State and Oswego County will conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information [G.5].

**H. *Emergency Facilities and Equipment Planning Standard: Adequate emergency facilities and equipment to support the emergency response are provided and maintained.***

**H. Evaluation: Adequate.**

The plans provided for review meet the six evaluation criteria under Planning Standard H in NUREG-0654/FEMA-REP-1, Rev. 1.

The plan material addressing Criterion H.3 is Adequate. New York State, Oswego County, and Onondaga County have each established an Emergency Operations Center for use in directing and controlling response functions [H.3]. The plans and procedures provide for timely activation and staffing of the facilities and centers [H.4]. Sufficient radiological monitoring equipment is provided for offsite radiological monitoring in the vicinity of the nuclear facility [H.7]. Provisions have been made to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use [H.10]. There are sufficient reserves of instruments/equipment to replace those that are removed from emergency kits for calibration or repair. Calibration of equipment is at intervals recommended by the supplier of the equipment. The New York State Radiological Emergency Preparedness Plan (REPP), the Oswego County REPP, and the Onondaga County Radiological Emergency Response Host Plan each include, in an appendix, identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies) [H.11]. New York State and Oswego County have established a central point for the receipt and analysis of all field monitoring data and coordination of sample media [H.12]. This criterion is not applicable to the Onondaga County.

***I. Accident Assessment Planning Standard: Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.***

**I. Evaluation: Adequate**

The plans provided for review meet all of the five evaluation criteria under Planning Standard I in NUREG-0654/FEMA-REP-1, Rev. 1.

New York State and Oswego County describe their capability and resources for field monitoring within the plume exposure Emergency Planning Zone, which are an intrinsic part of the concept of operations [I.7].

New York State and Oswego County will, where appropriate, provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This will include activation, notification means, field team composition, transportation, communication, monitoring equipment and estimated deployment times [I.8].

The plan material addressing Criterion I.9 is Adequate. New York State and Oswego County have capabilities to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as  $10^{-7}$  microcuries per cubic centimeter ( $\mu\text{Ci}/\text{cm}^3$ ) under field conditions and in the presence of noble gas and background radiation, as required by Criterion I.9. The procedures meet the requirements listed in FEMA REP-2, Revision 2, *Guidance on Offsite Emergency Radiation Measurement Systems*.

New York State and Oswego County have established means for relating the various measured parameters to dose rates for key isotopes and gross radioactivity measurements. Provisions have been made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the Protective Action Guides. The detailed provisions are described in separate procedures [I.10].

New York State has made arrangements to locate and track the airborne radioactive plume using Federal, State, and local resources. The county plans are not required to address this criterion. However, Oswego County has the primary responsibility of conducting on-the-ground monitoring of the radiation plume in the early phases of an incident at NMP3NPP [I-11].

**J. *Protective Response Planning Standard: A range of protective actions has been developed for the plume exposure pathway EPZ for emergency workers and the public. In developing this range of actions, consideration has been given to evacuation, sheltering, and, as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate (66 FR 5427). Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.***

**J. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet 15 of the 17 evaluation criteria under Planning Standard J in NUREG-0654/FEMA-REP-1, Rev. 1. Two of the remaining four criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard. The plans provided for review do not adequately meet Criteria J.10.a and J.10.l.

New York State, Oswego County, and Onondaga County have made provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density and specific radiological conditions [J.2].

New York State and Oswego County have established capabilities for implementing protective measures based on protective actions guides and other criteria, consistent with the recommendations for U.S. Environmental Protection Agency (EPA) regarding exposure resulting from the passage of radioactive plumes, (EPA-400-R-92-001, May 1992) and with those of U.S. Food and Drug Administration/U.S. Department of Health and Human Services (FDA/DHHS) regarding radioactive contamination of human food and animal feeds as published in the Federal Register of August 13, 1998 (63 FR 43402) [J.9].

The New York State Radiological Emergency Preparedness Plan (REPP), the Oswego County REPP, and the Onondaga County Radiological Emergency Response Host Plan (RERHP) include the following:

- The plan material addressing Criterion J.10.a is Adequate – corrections must be made. Oswego County and Onondaga County provide maps showing evacuation routes and evacuation areas. However, the Oswego County REPP does not include maps identifying the locations relocation centers in host areas, and shelter areas as required by Criterion J.10.a. [RAI NMP-007]
- The Oswego County REPP and the Onondaga County RERHP include maps showing population distributions around the NMP3NPP by evacuation areas. [J.10.b]
- The New York State REPP and the Oswego County REPP include means for notifying all segments of the transient and resident population. [J.10.c]

- New York State and Oswego County provide the means for protecting those persons who are mobility impaired physically or because of institutional or other confinement. [J.10.d]
- The plan material addressing Criterion J.10.e is Adequate. New York State, Oswego County, and Onondaga County have made provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, as required by Criterion J.10.e. These provisions include quantities and storage and describe the means of distribution. The New York REPP states that the counties will accomplish distribution to the general population. Details on the distribution of KI to the general public are included in the *Oswego County REPP Potassium Iodide (KI) Plan*.
- The New York State REPP, the Oswego County REPP, and the Onondaga County RERHP include the method by which decisions for administering radioprotective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers. [J.10.f]
- New York State, Oswego County and Onondaga County have adequate plans for relocating people from the emergency planning zone (EPZ) and for transporting them from the Reception Center (RC) to the Congregate Care Centers (CCC). [J.10.g]
- The Oswego County REPP and the Onondaga County RERHP identify the RC and 29 CCC that are at least 16 miles from the EPZ boundary. [J.10.h]
- The New York State REPP makes reference to Site Evacuation Time Estimates (ETE) (i.e. NMP3NPP /JA Fitzpatrick Nuclear Facility Development of Evacuation Time Estimates). The Oswego County REPP states that “traffic capacities for the evacuation time estimate within the plume exposure pathway Emergency Planning Zone (EPZ) is submitted under separate cover.” The *Nine Mile Point Nuclear Station Evacuation Time Estimate* was included as part of the COL application submitted to the Nuclear Regulatory Commission. [J.10.i]
- New York State and Oswego County have made provisions to control access to evacuated areas and organized responsibilities for such control. This criterion is not applicable to Onondaga County. [J.10.j]
- New York and Oswego County have provided for the identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures. [J.10.k]
- The plan material addressing Criterion J.10.1 is Adequate – corrections must be made. ETEs are presented for the general population, schools and transit dependent personnel. There are no ETEs for special facilities, as required by Criterion J.10.1. The *Nine Mile Point/JA Fitzpatrick Nuclear Facility Development of Evacuation Time Estimates, Appendix J, Summary of Evacuation Time Estimates and Evacuation*

*Time Graphs*, 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. [RAI NMP-006]

- The New York State REPP and the Oswego County REPP include the bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. These include expected local protection afforded in residential units or other shelter for direct and inhalation exposure, as well as ETEs. [J.10.m]

The plan material addressing Criterion J.11 is Adequate. The New York State REPP defines the general protective measures to be used for the ingestion pathway, as required by Criterion J.11. Watershed and farm maps; drinking water standards, updated dose conversion factors, and a meat sampling method are included.

New York State, Oswego County, and Onondaga County describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available are capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers. Primary responsibility for evacuee monitoring, decontamination, and registration will be with the host County, Onondaga County [J.12].

To become fully compliant with the Planning Standard J, information must be provided to address the areas detailed above.

**K. *Radiological Exposure Control Planning Standard: Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.***

**K. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet two of the five evaluation criteria under Planning Standard K in NUREG-0654/FEMA-REP-1, Rev. 1. Three of the remaining four evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard. The plans provided for review do not adequately meet Criterion K.3.b, K.4, and K.5.a.

New York State, Oswego County and Onondaga County have made provisions for the 24-hour per day capability to determine doses received by emergency personnel and volunteers involved in a nuclear accident and for distribution of direct-reading dosimeters (DRDs) and permanent record dosimeters (PRDs) [K.3.a].

The plan material addressing Criterion K.3.b is Adequate – corrections must be made. New York State, Oswego County, and Onondaga County will ensure that DRDs are read at appropriate frequencies and have made provisions for maintaining dose records for emergency workers involved in any nuclear accident, as required by Criterion K.3.b. The New York State plan addresses the process for storing/maintaining the records generated from the reading of the PRDs, which are the official external dose record for each individual who is issued a PRD. The New York State plan also addresses the process by which the PRD readings will be integrated with estimates of the internal dose received by the worker to generate a final Total Effective Dose Equivalent (TEDE) for that worker that would be the official dose record for that worker. The Oswego and Onondaga counties do not address the process by which the results from reading the permanent record dosimeters will be retained as a record. [RAI NMP-010]

The plan material addressing Criterion K.4 is Adequate – corrections must be made. New York State, Oswego County, and Onondaga County have established decision chains for authorizing emergency workers to incur exposures in excess of the Environmental Protection Agency (EPA) General Public Protective Action Guides (PAGs) for emergency workers and lifesaving activities, as required by Criterion K.4. The Oswego County Radiological Emergency Preparedness Plan (REPP) interchanges the terms “exposure” and “dose” in a manner that could be confusing to less experienced persons tasked with tracking dose and making radiological exposure control decisions. The Oswego County REPP, Procedure C, *Health and Radiological Specialist*, 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 (FTC) if a field team member’s absorbed dose has reached or exceeded the Oswego County dose 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 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.” The Oswego County Procedure C, *Health and Radiological Specialist*, Attachment 1, Section 5 identifies a 25 R 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. [RAI NMP-011]

The plan material addressing Criterion K.5.a is Adequate – corrections must be made. New York State and Onondaga County each specify action levels for determining the need for decontamination, but the Oswego County REPP does not specify action levels for determining the need for decontamination. [RAI NMP-012]

The plan material addressing Criterion K.5.b is Adequate. New York State and Oswego County have each established the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal, as required by Criterion K.5.b. The instructions for handling contaminated injured workers include a reference to the method for providing transport of contaminated injured workers.

To become fully compliant with the Planning Standard K, information must be provided to address items detailed above.

**L. *Medical and Public Health Support Planning Standard: Arrangements are made for medical services for contaminated injured individuals.***<sup>3</sup>

**L. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet two of the three evaluation criteria under Planning Standard L in NUREG-0654/FEMA-REP-1, Rev. 1. All of the evaluation criteria are partially addressed in the plans; however, corrections are needed to fully address all aspects of the planning standard. The plans provided for review do not adequately meet Criterion L.1.

The plan material addressing Criterion L.1 is Adequate – corrections must be made. New York State, Oswego County, and Onondaga County have each arranged for local and backup hospital and medical services with the capability for evaluation of radiation exposure and uptake [L.1]. They have also demonstrated assurance that persons providing these services are adequately prepared to handle contaminated individuals. However, the Onondaga County Radiological Emergency Response Host Plan, Procedure 1, *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*, states that upon notification of an Alert or Site Area Emergency, the Onondaga County Commissioner of Emergency Management 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 [RAI NMP-013].

The plan material addressing Criterion L.3 is Adequate. New York State Radiological Emergency Preparedness Plan (REPP) has developed lists indicating the locations of public and private hospitals and other emergency medical service facilities, including military and other federal facilities, within the State considered capable of providing medical support for any contaminated injured individual [L.3]. The listing includes the ambulatory and non-ambulatory capabilities for each facility.

New York State, Oswego County, and Onondaga County have each made arrangements for transporting victims of radiological accidents to medical support facilities [L.4].

To become fully compliant with the Planning Standard L, information must be provided to address item detailed above for Criterion L.1.

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<sup>3</sup> The availability of an integrated emergency medical services system and a public health emergency plan serving the area in which the facility is located and, as a minimum, equivalent to the Public Health Service Guide for Developing Health Disaster Plans, 1974, and to the requirements of an emergency medical services system as outlined in the Emergency Medical Services System Act of 1973 (PL 93-154 and amendments in the 1979 PL 96-142), should be a part of and consistent with overall State or local disaster control plans and should be compatible with the specific overall emergency response for the facility.

***M. Recovery and Reentry Planning and Post-Accident Operations Planning Standard:  
General plans for recovery and reentry are developed.***

**M. Evaluation: Adequate.**

The plans provided for review meet the three evaluation criteria under Planning Standard M in NUREG-0654/FEMA-REP-1, Rev. 1.

The plan material addressing Criterion M.1 is Adequate. New York State and Oswego County have developed general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures are reached.

The New York State REPP specifies the means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur [M.3].

The plan material addressing Criterion M.4 is Adequate. The New York State REPP establishes a method for periodically estimating total population exposure, as required by Criterion M.4. It specifies who is responsible for estimating the total population exposure; the frequency for performing these dose estimates, and a schedule for periodically estimating the population doses; and the population for which dose will be estimated.

***N. Exercises and Drills Planning Standard: Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.***

**N. Evaluation: Adequate.**

The plans provided for review meet all of the 10 evaluation criteria under Planning Standard N in NUREG-0654/FEMA-REP-1, Rev. 1.

The plans provide for biennial exercises at NMP3NPP conducted as set forth in Nuclear Regulatory Commission and Federal Emergency Management Agency rules and guidelines [N.1.a]. These exercises will include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario; observation and critique by qualified personnel from Federal, State, or local governments; varied scenarios such that all major elements of the plans and preparedness organizations are tested within a six year period; provisions to start an exercise between 6:00 p.m. and 6:00 a.m. or on the weekend once every six years; varied weather conditions; and some exercises will be unannounced [N.1.b].

The plans detail the types of drills to be conducted including:

- Communication drills [N.2.a]
- Medical Emergency drills [N.2.c]
- Radiological Monitoring drills [N.2.d]
- Health Physics drills [N.2.e]

The plans describe how exercises and drills are to be carried out and the requirements for those exercises and drills in accordance with evaluation criteria N.3.a, b, c, d, e, and f. They also state that qualified observers from Federal, State, or local governments will observe and critique exercises or drills [N.4].

New York State, Oswego County, and Onondaga County have established means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions, and have established management control to be used to ensure that corrective actions are implemented [N.5].

***O. Radiological Emergency Response Training Planning Standard: Radiological emergency response training is provided to those who may be called on to assist in an emergency.***

**O. Evaluation: Adequate.**

The plans provided for review meet all of the 11 evaluation criteria under Planning Standard O in NUREG-0654/FEMA-REP-1, Rev. 1.

The plans provide for the training of appropriate individuals [O.1]. Information is provided on the training of personnel that are part of mutual aid agreements as required by evaluation criterion O.1.b.

The scope of the training programs includes the following categories:

- Directors or coordinators of response organizations [O.4.a]
- Personnel responsible for accident assessment [O.4.b]
- Radiological monitoring teams and radiological analysis personnel [O.4.c]
- Police, security and fire-fighting personnel [O.4.d]
- First aid and rescue personnel [O.4.f]
- Local support services personnel including Civil Defense/Emergency Service personnel [O.4.g]
- Medical response personnel [O.4.h]
- Personnel responsible for transmission of emergency information and instructions [O.4.j]

The plans also provide for initial and annual retraining of response personnel [O.5].

***P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans Planning Standard: Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.***

**P. Evaluation: Adequate – corrections must be made.**

The plans provided for review meet eight of the nine evaluation criteria under Planning Standard P in NUREG-0654/FEMA-REP-1, Rev. 1. All of the evaluation criteria are addressed in the plans; however, the plans provided for review do not adequately meet Criterion P.8.

The plan material addressing Criterion P.1 is Adequate. New York State, Oswego County, and Onondaga County each identify training for those individuals responsible for the planning effort [P.1].

New York State, Oswego County, and Onondaga County each identify by title the individual with overall authority and responsibility for radiological emergency response planning [P.2]. Emergency Planning Coordinators, who are responsible for the development and updating of emergency plans and coordination of these plans with other response organizations, are designated [P.3].

New York State, Oswego County, and Onondaga County will update their plans and agreements as needed, review and certify them to be current on an annual basis. The updates will take into account changes identified by drills and exercises [P.4]. Emergency response plans and procedures will be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages will be dated and marked to show where changes have been made [P.5].

The plans contain detailed listings of supporting plans and their sources [P.6]. The New York State, Oswego County, and Onondaga County plans each contain as an appendix listing, by title, procedures required to implement the plan. The listing includes the section(s) of the plan to be implemented by each procedure [P.7].

The plan material addressing Criterion P.8 is Adequate – corrections must be made. Plans for New York State, Oswego County, and Onondaga County contain a specific table of contents and have been cross-referenced to the criteria in NUREG-0654/FEMA-REP-1 [P.8]. However, there are errors in the NUREG-0654 cross-reference tables [RAI NMP-011].

The plan material addressing Criterion P.10 is Adequate. Each plan provides for the updating of telephone numbers and other materials that change over time on a quarterly basis [P.10].

To become fully compliant with the Planning Standard P, information must be provided to address item detailed above for Criterion P.8 (Cross-References).

***III. Schedule of Pending Actions/Status Report***

Not applicable.

#### IV. Technical Review Composite Rating Summary

##### NMP3NPP Plans

(Criteria applicable to the NRC Licensee only are not included in the list below)

<b>Element</b>	<b>Rating</b>	<b>Element</b>	<b>Rating</b>	<b>Element</b>	<b>Rating</b>
A.1.a	Adequate	H.3	Adequate	M.1	Adequate
A.1.b	Adequate	H.4	Adequate	M.3	Adequate
A.1.c	Adequate	H.7	Adequate	M.4	Adequate
A.1.d	Adequate	H.10	Adequate	N.1.a	Adequate
A.1.e	Adequate	H.11	Adequate	N.1.b	Adequate
A.2.a	Adequate	H.12	Adequate	N.2.a	Adequate
A.2.b	Adequate	I.7	Adequate	N.2.c	Adequate
A.3	ACM	I.8	Adequate	N.2.d	Adequate
A.4	Adequate	I.9	Adequate	N.2.e	Adequate
C.1.a	Adequate	I.10	Adequate	N.3.a	Adequate
C.1.b	Adequate	I.11	Adequate	N.3.b	Adequate
C.1.c	Adequate	J.2	Adequate	N.3.c	Adequate
C.2.a	Adequate	J.9	Adequate	N.3.d	Adequate
C.3	Adequate	J.10.a	ACM	N.3.e	Adequate
C.4	ACM	J.10.b	Adequate	N.3.f	Adequate
D.3	ACM	J.10.c	Adequate	N.4	Adequate
D.4	ACM	J.10.d	Adequate	N.5	Adequate
E.1	Adequate	J.10.e	Adequate	O.1	Adequate
E.2	Adequate	J.10.f	Adequate	O.1.b	Adequate
E.5	Adequate	J.10.g	Adequate	O.4.a	Adequate
E.6	Adequate	J.10.h	Adequate	O.4.b	Adequate
E.7	Adequate	J.10.i	Adequate	O.4.c	Adequate
F.1.a	Adequate	J.10.j	Adequate	O.4.d	Adequate
F.1.b	Adequate	J.10.k	Adequate	O.4.f	Adequate
F.1.c	Adequate	J.10.l	ACM	O.4.g	Adequate
F.1.d	Adequate	J.10.m	Adequate	O.4.h	Adequate
F.1.e	Adequate	J.11	Adequate	O.4.j	Adequate
F.2	Adequate	J.12	Adequate	O.5	Adequate
F.3	Adequate	K.3.a	Adequate	P.1	Adequate
G.1	Adequate	K.3.b	ACM	P.2	Adequate
G.2	Adequate	K.4	ACM	P.3	Adequate
G.3.a	Adequate	K.5.a	ACM	P.4	Adequate
G.4.a	Adequate	K.5.b	Adequate	P.5	Adequate
G.4.b	Adequate	L.1	ACM	P.6	Adequate
G.4.c	Adequate	L.3	Adequate	P.7	Adequate
G.5	Adequate	L.4	Adequate	P.8	ACM
				P.10	Adequate



**V. 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&amp;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-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>State: None</p> <p>County: Oswego Onondaga</p>

RAI Number	Request for Additional Information	RAI For
	<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&amp;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 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 incorporate 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</p>	<p>State: None</p> <p>County: Oswego Onondaga</p>

<b>RAI Number</b>	<b>Request for Additional Information</b>	<b>RAI For</b>
	incorporated into ECLs.	
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>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>	<p>State: New York</p> <p>County: Oswego Onondaga</p>

<b>RAI Number</b>	<b>Request for Additional Information</b>	<b>RAI For</b>
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 location of 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-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>

RAI Number	Request for Additional Information	RAI For
	<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>

RAI Number	Request for Additional Information	RAI For
	<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>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>
NMP-013	<p>Subject: Statement Indicating Responsibility for Activating Facility/Services in General Emergency</p>	<p>State: None</p>

<b>RAI Number</b>	<b>Request for Additional Information</b>	<b>RAI For</b>
	<p>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>County: Onondaga</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</i></p>	<p>State: New York</p> <p>County: Onondaga</p>

<b>RAI Number</b>	<b>Request for Additional Information</b>	<b>RAI For</b>
	<p><i>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>	



## *Appendix 1: Acronyms and Definitions*

<b>Acronym</b>	<b>Definition</b>
CCC	Congregate Care Center
CDE	Committed Dose Equivalent
CFM	Cubic Feet per Minute
COL	Combined License
DRD	Direct Reading Dosimeter
EAL	Emergency Action Level
EAS	Emergency Alert System
ECL	Emergency Classification Level
EOC	Emergency Operations Center
EPA	(U.S.) Environmental Protection Agency
EPZ	Emergency Planning Zone
ERPA	Emergency Response Planning Area
ETE	Evacuation Time Estimate
FDA	(U.S.) Food and Drug Administration
FEMA	Federal Emergency Management Agency
FRMAC	Federal Radiological Monitoring and Assessment Center
FRMAP	Federal Radiological Monitoring and Assessment Plan
GE	General Emergency
JIC	Joint Information Center
KI	Potassium Iodide
LOA	Letter of Agreement
mR/hr	milli-Roentgen per hour
NUREG	Nuclear Regulatory Commission Publication
PAD	Protective Action Decision
PAG	Protective Action Guide
PAR	Protective Action Recommendation
PIO	Public Information Officer
RAP	Radiological Assistance Program
RC	Reception Center
REM	Roentgen Equivalent Man
REP	Radiological Emergency Preparedness
REPP	Radiological Emergency Preparedness Plan
RERHP	Radiological Emergency Response Host Plan
SAE	Site Area Emergency
SRD	Self Reading Dosimeter
TBD	To Be Determined
TCP	Traffic Control Point
TEDE	Total Effective Dose Equivalent
TLD	Thermoluminescent Dosimeter
μCi	micro (μ) Curies