



Federal Emergency Management Agency

Washington, D.C. 20472

October 18, 1982

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Mr. William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Dircks:

The purpose of this letter is to address the need for either a full scale or limited scale exercise at or near the conclusion of the 120 day clock at the Indian Point Nuclear Power Station. This issue was raised by Commissioners Gilinsky and Asselstine during my briefing before the Commission on September 9, 1982, as to the status of FEMA's effort on evaluating offsite emergency plans and preparedness at Indian Point. At that time I stated that the best method we have for gauging preparedness is through exercising. However, an exercise (full or limited) at or near the end of the 120 day clock will not be feasible. FEMA believes that the regularly scheduled annual exercise in late February or early March will better indicate the state-of preparedness at Indian Point for the reasons discussed below.

FEMA will be prepared to provide an "update" on the status of remedial actions to correct deficiencies outlined in the Interim Findings Report of August 2, 1982, at your request, at the end of the 120 day clock. This update will address the status of plan revisions, equipment purchases, and training as they relate to the previously identified deficiencies. This element of our process is "plan review" and this will include our conclusion on the adequacy of the Plan for offsite emergency preparedness around the facility as a result of the corrective actions which have been taken by that date. This will be followed by an evaluation of preparedness, which is the ability to implement the plan, at the annual exercise in late February or early March 1983. Prior to an exercise the participants must be trained in the plans concept, the utilization of equipment, and specific areas of concern (Public Information Officers, etc.) and new equipment must be field verified by the users. It is premature to evaluate the preparedness around Indian Point until proper training reflecting recent revisions has occurred. It must be remembered that many of the major corrective actions now underway will not be completed until late October or early November and some, such as public education, may not be completed until early 1983.

There are other significant factors that enter into the question of exercise timing. While FEMA does not maintain specific cost data for exercises, it is an accepted fact that the direct and indirect costs incurred by Federal, State, and local authorities in planning for and conducting exercises are significant. Therefore, efficient utilization of limited financial and staff resources at all levels of government is a very real consideration, particularly when evaluating the Commissioner's request in the context of the activities presently underway to upgrade emergency preparedness at Indian Point. In addition to

Forwarded to Commissioners, OGC, OPE, SECY.
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these resource (including cost) considerations FEMA is particularly concerned that the effort associated with preparing for and conducting an exercise (full or limited) at Indian Point in December would likely prove detrimental to the upgrading of preparedness presently underway around Indian Point. Also, it should be noted that the State of New York and FEMA will be involved in an exercise at the Ginna Power Plant in December. This further reduces the availability of manpower and resources to plan for and conduct an exercise at Indian Point in December, however, this may give insight into New York's upgrading of emergency preparedness. A copy of the schedule for all exercises in New York State in FY-83 is attached.

The matter of an earlier exercise at Indian Point has been informally discussed with State officials. They oppose such an exercise for the reasons cited in this letter and because an additional exercise would result in resources being diverted from remedial actions to exercise preparation.

It should also be noted that as of this date the counties of Rockland and Westchester have not received any funding from the State as a result of the utilities' annual payment. However, on September 17, 1982, the counties were informed by the State of their allocations and asked to submit an expenditure plan for review. It is anticipated that it will take about four or five weeks to receive payment after submission of the county plan. The counties around Indian Point should receive the following; Putnam County \$27,962, Orange County \$31,691, Westchester County \$94,724 and Rockland County \$57,870. This money will help, but these counties are still under a resource strain to upgrade the emergency preparedness around Indian Point. These counties must institute training prior to any new exercise once the plan revisions, and equipment purchases are made. A December exercise would make this impossible.

It should also be pointed out that the normal exercise process begins seventy-five days prior to the exercise with the submittal of exercise objectives by the State and utility to the FEMA and NRC Regional Offices. This is followed up by an exercise scenario in thirty days (45 days prior to the exercise). The current effort underway to revise the plan makes adherence to the normal exercise development process impossible. This could result in an exercise that does not effectively test the status of offsite emergency preparedness with emphasis on the previously identified deficiencies. FEMA is prepared to initiate planning for the next regular scheduled exercise in December in accordance with our procedures. FEMA will ensure that the exercise scenario emphasizes those areas that were deficient resulting in the August 1982 negative Interim finding.

I would like to stress once again that FEMA's evaluation of offsite preparedness is an ongoing task that continually evaluates the state of readiness. The conduct of an exercise in December at Indian Point would not reduce the need for continuing evaluation of offsite emergency preparedness at Indian Point in the future.

FEMA is currently spending considerable effort working with the State, locals, utilities and other Federal agencies to correct the deficiencies at Indian Point. The "Task Force Concept" (5 Task Forces/Work Groups) has been established

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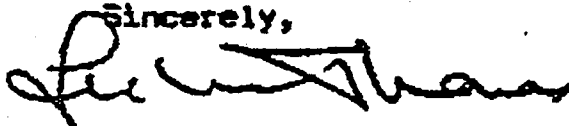
nd is comprised of representatives of the State, utilities, NRC and FEMA. County representatives have participated in the PIO work group sessions and will be invited to participate in the bi-weekly meeting scheduled October 19. Bi-weekly meetings are held to provide FEMA and the NRC with the status of remedial actions.

The Commission should be aware that the "Alert and Notification System" evaluation will not be completed during the 120 day clock. FEMA is finalizing its guidelines for testing these systems nationwide which will be implemented in FY-83. However, in order to ensure compliance at this time the utilities have been asked to certify that the system has been installed in accordance with "system design." FEMA will further request that the design plans be forwarded to FEMA Headquarters for review at that time. This review will be a part of the FEMA evaluation of Alert and Notification according to the guidelines under development.

In conclusion, I would like to state that an exercise in December would be unrealistic in light of the scheduled completion dates for plan-revisions and equipment purchases. All levels of government must be trained and/or familiarized with these modifications in order to make the exercise a true evaluation of preparedness.

I look forward to briefing the Commission on the Indian Point status on October 21, 1982. If you have any further questions on this matter please call me or Mr. Richard Krimm, Assistant Associate Director, Office of Natural and Technological Hazards at 287-0176.

Sincerely,



Lee M. Thomas
Associate Director
State and Local Programs and Support

Enclosure

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RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE
SCHEDULED FOR NEW YORK STATE
THROUGH FY 1983

COMMERCIAL
NUCLEAR POWER
REACTOR

DATE OF
NEXT SCHEDULED
EXERCISE

WINGA

DECEMBER 1982

INDIAN POINT

FEBRUARY 1983

SHOREHAM

APRIL 1983

FITZPATRICK/NINE MILE POINT

AUGUST 1983

TRANSMITTAL TO: Document Control Desk,
016 Phillips

ADVANCED COPY TO: The Public Document Room

DATE: 10/22/82 cc: OPS File

From: SECY OPS Branch

C&R (Natalie)

Attached are copies of a Commission meeting transcript/s/ and related meeting document/s/. They are being forwarded for entry on the Daily Accession List and placement in the Public Document Room. No other distribution is requested or required. Existing DCS identification numbers are listed on the individual documents wherever known.

Meeting Title: Disc. of Emergency Planning at
Indian Point

MEETING DATE: 10/21/82 Open
Closed

ITEM DESCRIPTION:	Copies Advanced To PDR:	*	DCS COPIES: (1 of each Checked)		
			Original Document	May be Dup*	Duplicate Copy*
1. <u>transcript</u> <u>(w/inserts)</u> <u>(attached)</u>	<u>1</u>	*	<u>1</u>		
2. <u>Letter to Dirks for</u> <u>FEMA dated 10/19/82</u>	<u>1</u>	*		<u>1</u>	
3. _____	_____	*	_____	_____	_____
4. _____	_____	*	_____	_____	_____
5. _____	_____	*	_____	_____	_____

(PDR is advanced one of each document, two of each SECY paper.)

*Verify if in DCS, and change to "PDR available."