

INTERIM FINDINGS REPORT
For Reasonable Assurance

On the Adequacy of Offsite
Radiological Emergency Response Planning and Preparedness
for the
V. C. Summer Nuclear Station, Units 2 & 3
Jenkinsville, South Carolina

June 25, 2010

Prepared by the
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Federal Emergency Management Agency

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Executive Summary

FEMA Region IV conducted a plan review associated with the application by South Carolina Electric and Gas for a combined operating license (COL) at the V. C. Summer Nuclear Station site for units 2 & 3 in accordance with the requirements of 44 CFR 350, its applicable planning standards and the evaluation criteria established in NUREG-0654/FEMA REP-1, rev.1, 1980, as amended.

FEMA approved under Title 44 CFR 350 the State of South Carolina's offsite plans and preparedness for the V. C. Summer Nuclear Station on November 13, 1981 and reaffirmed in the January 23, 2008, V. C. Summer Nuclear Station Exercise Report transmittal letter from FEMA to the Region II Administrator, Nuclear Regulatory Commission. The State of South Carolina's capability has been well demonstrated through their integral involvement in the development of the current plans and procedures for the existing reactor at the V. C. Summer Nuclear Station site, as well as the other sites either within or affecting the State of South Carolina. Further the State and Fairfield, Lexington, Newberry and Richland Counties have demonstrated through biennial exercises that the capabilities exist to successfully respond to an incident at the V. C. Summer Nuclear Station. They have also certified through their annual letter of certification compliance with the planning standards set forth in 44 CFR 350. The biennial exercises and the annual letters of certification serve as the basis for their continued 'reasonable assurance' findings by FEMA at this site.

The State and local governments' plans and procedures, associated with the government's response to a radiological incident at the V. C. Summer Nuclear Station, reviewed by FEMA Region IV are listed in Section I, paragraph C.

I. Introduction

A. General Characteristics of the V. C. Summer Nuclear Station

The proposed V. C. Summer Nuclear Station (VCSNS) Units 2 and 3 will be located on the current VCSNS site. The site for the proposed Unit 2 is approximately 3/4 of a mile from the current site and the proposed site Unit 3 is approximately 1.1 miles from the current unit. The proposed Units 2 and 3 are a two unit Westinghouse AP 1000 standard design for a pressurized water reactor. The VCSNS is located approximately 30 miles northwest of Columbia, South Carolina at the southern end of the Monticello Reservoir and near the western border of Fairfield County. The 10-mile emergency planning zone (EPZ) for the current site includes portions of Fairfield, Lexington, Newberry and Richland Counties. The land use in the EPZ is rural in nature. The estimated permanent population for the current EPZ is approximately 11,800. Lake Monticello is the major recreational area in the EPZ.

The VCSNS Ingestion Exposure Pathway EPZ consists of an area about 50 miles in radius around the site. Cherokee, York, Lancaster, Union, Chester, Laurens, Greenwood, Saluda,

Aiken, Edgefield, Calhoun, Kershaw, Sumter, Spartanburg, Lee, McCormick, and Orangeburg counties in South Carolina, and a small portion of Union County, North Carolina, lie within the ingestion exposure pathway Emergency Planning Zone (IPZ) of VCSNS

B. Emergency Response Organization

The South Carolina State radiation emergency response organization parallels that for any disaster within the state using Emergency Support Functions (ESFs) as outlined in the National Response Framework (NRF). Existing government departments and agencies comprise the basic structure and will respond commensurate with the level of the incident. The focus of South Carolina's emergency organization is determined by the requirement to support four functional areas at the State level: radiation control, law enforcement, reception and care, and agricultural security.

The primary responsibility for directing and conducting emergency response in the event of an incident at the VCSNS rests jointly with the State and local governments. The Governor of the State of South Carolina has overall responsibility for emergency preparedness and response concerning an incident at the VCSNS. The South Carolina Emergency Management Division (SCEMD), part of the Office of the Adjutant General, is the focal point within the State government for emergency planning, preparedness, mitigation, response, and recovery. The Governor has charged the SCEMD Director with the responsibility of coordinating the activities of all departments, agencies, and organizations of state government and local emergency management agencies to carry out emergency functions relating to a NPP incident. SCEMD directs the staff activities of the State Emergency Operation Center (SEOC).

The South Carolina Department of Health and Environmental Control (DHEC), Bureau of Land Waste Management, Division of Health and Environmental Control analyzes the offsite impact or potential impact of an incident at the VCSNS and provides recommendations to the Governor's authorized representative for decision.

C. Plans

The State of South Carolina has both an Emergency Operations Plan (EOP) and an Operational Radiological Emergency Response Plan (SCORERP). Both the EOP and SCOREPP use the National Incident Management System (NIMS) format. The South Carolina EOP addresses an array of hazards; the SCORERP addresses, in detail, the State's response specific to an incident at a nuclear power plant. Fairfield, Lexington, Newberry and Richland Counties have emergency response plans for the V.C. Summer Nuclear Station.

The analysis of offsite emergency preparedness for the State of South Carolina and Fairfield, Lexington, Newberry and Richland Counties in response to possible incidents at the V. C. Summer Nuclear Station proposed units 2 and 3 has been based on:

- i. Review of the South Carolina Emergency Operations Plan, dated September

- 2005;
- ii. Review of the South Carolina Operational Radiological Emergency Response Plan, January 2007
- iii. Fairfield County Emergency Operations Plan, June 2006;
- iv. Lexington County V.C. Summer Nuclear Station Ax (VCSNS) Radiological Emergency Response Plan (RERP), May 2007;
- v. Newberry County Emergency Operations Plan, 2006;
- vi. Richland County, South Carolina, Emergency Operations Plan, April, 2007.

D. Basis for the Findings

The findings for this review are based on 44 Code of Federal Regulation part 353, NUREG 0654/FEMA-REP-1 Rev. 1, and Guidance Memoranda.

E. Evaluation Format

In accordance with the FEMA/NRC Memorandum of Understanding, dated June 17, 1993, FEMA has agreed to furnish assessments, findings and determinations as to whether State and local emergency plans and preparedness are adequate and capable of implementation. Guidance for review and development of radiological emergency response plans is contained in the document 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 current FEMA guidance documents.

Each planning standard criterion that applies to state and local emergency response organizations will be addressed and include:

An assessment of the reviewed plans and procedures, noting one of the following with respect to the planning standard criterion:

- i. **Adequate:** Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
- ii. **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.
- iii. **Inadequate:** Plans are inadequate and cannot be implemented until they are revised to correct deficiencies noted in the Federal review.
- iv. **N/A –** The planning criterion is not applicable to this Offsite Response Organization (ORO)

II. Review and Evaluation of Emergency Preparedness Plans and Procedures for the V.C. Summer Nuclear Station, Units 2 and 3, against the Planning Standards of NUREG-0654/FEMA-REP-1, Rev. 1, as amended

- A. Assignment of Responsibility (Organization Control):** 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.

Evaluation: Adequate

Statement:

The SCORERP Section IV discusses general activation steps and organizations involved in a response. Section V lists the various Emergency Support Function (ESF) groups, Federal Agencies and local governments and organizations and their responsibilities. In addition Annex H identifies and documents guidance on the expected interstate and federal agency response procedures and outlines the procedures for state/federal interface and cooperation in the event of an incident at a fixed nuclear facility (FNF). The SCORERP Section IV and V provides a description of what the organization plans to do in an emergency, how this will be accomplished, and by whom. The SCORERP lists South Carolina Emergency Management Division (SCEMD) as the lead state agency for coordinating the state's offsite response to an incident at an FNF and the Department of Health and Environmental Control (DHEC) as the lead state radiation emergency response agency and explains their responsibilities and the responsibilities of other state and federal agencies. Additional details and how the agencies interrelate exist in Appendix 2 (RER Primary and Support Responsibilities) and Annex H (Interstate and Federal Agency Response Support). The SCEOP also provides guidance under the Concept of Operations in Section IV and includes descriptions of ESF responsibilities during emergency situations. SCORERP Section IV and V pages 2 -21 provide overviews and Appendix 2, pages 2-1 to 2-4 details primary and support responsibilities for each ESF. SCEOP Section III describes organizations and assignment of responsibilities; Attachment A, Annex 25 also describes responsibilities during radiological hazards.

County Plans, Fairfield (Annex Q, Section V.A), Lexington (Section I.F), Newberry (Section I) and Richland County (Section I.F) address and identify principle organizations intended to be part of the overall response effort on a continuous basis in support of the response. Participants identified include Utility, Federal, State local and private sector organizations. County plans also address the Concept of Operations and the relationship to the total effort.

Figure 1, page 25 of the SCORERP provides a block diagram that illustrates the relationships of those in the diagram and provides a special note that applies to local governments' relationship with that of the State in the event an incident affects two or more counties. Section IV page 3 of the SCORERP states: "Under the Governor's direction, the total and combined efforts of state and local governments will be utilized to mitigate the effects of off-site radiological hazards resulting from an FNF accident." In addition the SCEOP Annex 25 Section III.A restates this and SCEOP Section III.F and Annex 25 Section III.B further delegates the Director SCEMD as the lead for coordinating departments,

agencies, and organizations in emergency response activities involving radiological hazards.

Fairfield, Appendix 1 to Annex Q, Lexington, Attachment 1 to Annex 25a, Newberry, Attachment 1 to Annex Q and Appendix 1 to Annex J and Richland County, Appendix 1 to Annex 24a and Attachment 1 of Basic Plan illustrate Organizations in Block diagram. Each plan identifies and specifies by title whom is designated and in charge of the emergency response effort.

SCORERP section IV A page 2 states “All radiological emergency response organizations will be prepared to react on a 24-hour basis, and will be capable of continuous operations for a protracted period.” Annex A states that Alert telephone numbers and designated representatives for state, federal, and contiguous state agencies are found in the SCEMD Telephone Directory. The SCEOP Section V.A states the warning point has 24-hour radio, special telephone operations, and operation of the EAS system. Section IV.A page 2 states all organizations will be prepared to react on a 24-hour basis. SCEOP Section III.E.7 page 12 and Annex 25 Section III.A page Annex25-A-3 states all agencies will be prepared for 24-hour operations. SCEOP section V.A lists 24 hour radio and telephone operations.

Each County Plan provides for and details 24-hour emergency response capability and communications links.

SCEOP Section IV.C.6, Annexes 1-19 and SCORERP Section V identifies key organizational positions, lists the ESFs, the responsible agency and their primary responsibilities. SCEOP Table 3 and SCORERP Appendix 2 detail the agencies, ESFs in table format and their primary and support functions. SCORERP Section V A-C pages 12 – 21 provide basic descriptions and Appendix 2 pages 2-1 – 2-4 provide details, functions and responsibilities for personnel and agencies.

Fairfield, Lexington, Newberry and Richland Counties specify functions and responsibilities of major elements and key individuals by title, including Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response and Radiological Exposure Control.

SCORERP Section IX.A lists the State laws and regulations and Section IX.B lists Federal regulations regarding emergency response and the authority or legal basis for these officials for South Carolina. SCEOP Section III.F and Annex 25 Section III.B further delegates the Director SCEMD as the lead for coordinating departments, agencies and organizations in emergency response activities involving radiological hazards. SCORERP Appendixes 6-12 contain letters of agreement with other agencies and organizations in support of state operations. SCORERP Section IV.A and SCEOP Annex 25 Section III.A state: “Under the Governor's direction, the total and combined efforts of state and local governments will be utilized to mitigate the effects of off-site radiological hazards resulting from an FNF accident. SCORERP Section IV.A.1 specifies that under the Governor’s direction all organizations will be prepared to react on a 24-hour basis for any radiological response. SCEOP Annex 25 Section III.A requires all department heads to ensure agencies can respond

on 24-hour basis for protracted time. All radiological emergency response organizations will be prepared to react on a 24-hour basis, and will be capable of continuous operations for a protracted period. Directors of state agencies, departments, and commissions are responsible for ensuring that their agencies' RER responsibilities are accomplished. Designated county officials are responsible for emergency response within their jurisdictions.”

Fairfield, Lexington, Newberry and Richland County Plans included State, Federal and County laws, regulations, statutes and agreements which provide the legal basis for the authority granted agencies and individuals. Each plan details the provisions for establishing and maintaining 24-hour continuous operations and who is responsible for the continuity of resources.

B. Onsite Emergency Organization

Evaluation: Not Applicable

Statement: This evaluation standard is applicable only to the on-site emergency response organization.

C. Emergency Response Support and Resources: 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.

Evaluation: Adequate

Statement:

SCORERP Annex H, III.C.4 states: “The Governor of South Carolina, acting directly or through his/her designee, the South Carolina Emergency Management Division Director, is specifically authorized to request federal assistance in the event of an incident at a FNF.” SCORERP Annex H, III.C.4 page H-2 specifies the Governor of South Carolina has the authority to request Federal assistance. SCORERP Annex H Appendix 1 Section II contains resources that the State of South Carolina should expect from the federal government as part of the Federal Radiological Emergency Response Plan (FRERP) (now the NUCRAD Annex FRP). In addition the South Carolina Technical Radiological Emergency Response Plan (SCTRERP) Section C Table 1 depicts a map of South Carolina and the estimated response time for federal assistance to all of the FNFs from the Savannah River Site, which has been designated the primary federal responder under the FRERP. SC - SCORERP Annex H details expected resources and availabilities and STRERP Section C Table I page C-10 shows travel time for DOE response.

Fairfield, Lexington, Newberry, and Richland Counties will provide assistance within their capacity. All requests for Federal assistance will come from the State of South Carolina.

SCTRERP Section B.XII, pg B-6 states: Three sets of maps are maintained by SCDHEC Bureau of Land and Waste Management which show the environs of each fixed nuclear facility in the state. These maps were not included in FEMA's copy of the SCTRERP due to their size and bulk. The maps show the location of the facility, evacuation routes, relocation and personnel assembly areas, sampling locations, and survey points. In addition, features such as dairy farms, water treatment plants, airports and airstrips, hospitals, schools, industrial plants, etc. are shown.

County plans conform to that of the State and supplement the state plan as follows: Fairfield County Annex Q, Section VII.A identifies, the County EOC, SEOC, EOF, JIC and adjacent County EOCs. VII.B provides Communication Assets. Appendix 3 lists Schools. Tab A to Appendix 9, identifies reception center. Lexington County: Annex 25a, Section VI.A identifies location of EOC, reception center and hotel resources. It also addresses communications that will be available to support Federal effort, including ESSX, IRIS, SLED and other public and private communications systems that can be used under emergency conditions. Newberry County: Section VI.A identifies county and adjacent EOC locations, Newberry County and Columbia Metropolitan Airports. Section VI.B identifies Communications resources. Appendix 9 provides shelters and capacities. Richland County: Annex 25a Section VI.A establishes the location of county EOC. Section VI.B RERP and Section IV.3 of EOP identify communications assets. Basic Plan (EOP), Attachment 7, pg. 41 identifies the Columbia Owens Downtown Airfield as a resource and McEntire Airbase within its boundaries.

SCORERP Part 5 Section IV.B.2.B and C page 5 states a technical representative from DHEC will be dispatched to the EOF and that a representative from EMD will also be sent to the EOF. In addition SCTRERP Section C.III states that personnel will be dispatched to the Forward Emergency Operations Center (FEOC) upon notification.

Fairfield, Lexington, Newberry and Richland Counties: Support for Emergency response will come from the state via DHEC within three hours. The counties do not plan to send a representative to the EOF.

SCTRERP Section B.IV.D states that SCDHEC maintains a Mobile Radiological Laboratory (MRL) equipped with emergency response supplies and instrumentation. The MRL can be dispatched to an accident site to perform field sample analyses and radiological monitoring. The MRL is equipped with radio communications on the statewide SCDHEC network, and the capability of SCDHEC/MRL to detect and measure radio-iodine concentrations and other radionuclides in the environment is described in Appendix II of this plan. Appendix II states that: Environmental samples will be transported to the Radiological Laboratory in Columbia, or to the Mobile Radiological Laboratory deployed in the field, at the discretion of the Nuclear Response and Emergency Environmental Surveillance Field Director or Environmental Surveillance Coordinator.

SCORERP Section V discusses various state, local, federal, and support agencies and companies that could be relied upon to provide assistance and Appendixes 6-12 detail letters of agreement.

Fairfield County Annex Q, Section II identifies local, state, federal and supporting agencies or organizations and resources relied upon to support in the emergency response effort. Basic Plan, Section VI.D states the County is a signatory to a mutual aid agreement on file. Assistance is provided under SCORERP. Lexington County Annex 25a, Section II identifies local, state, federal and supporting agencies and/or organizations and resources relied upon to support the county. One mutual aid agreement and two letters of agreement are included as part of Annex, Attachment 9. Assistance is provided under SCORERP. Newberry County Annex Q, Section II identifies local, state, federal and supporting agencies/organizations and resources relied upon to support the county. Assistance is provided under SCORERP. Richland County Annex 25a, Section II identifies local, state, federal and supporting agencies and/or organizations and resources relied upon to support the county. Appendix 9, pg. 63 establishes two existent letters of agreement with Greater Columbia Hospitality Association and SCE&G and indicates that they are on file in the Richland County Plans and Mitigation Division Office. Assistance is provided under SCORERP.

D. Emergency Classification System:

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 facility licensees for determinations of minimum initial offsite response measures.

Evaluation: Adequate

Statement:

SCORERP Section IV.A.2 states: "In conformance with NUREG-0654, radiological accidents can be categorized into one of four Emergency Classification Levels (ECLs), Notification of Unusual Event, Alert, Site Area Emergency (SAE), and General Emergency (GE)." SCTRERP Section B.III. A-D and Appendix I further discuss ECLs and related response actions.

SCORERP Section IV.A.3 states that the ECL level determines the degree of licensee, state, and local response as outlined in Appendix 3. Off-site response will be initiated by state and local forces as recommended by DHEC and/or the FNF. In addition, SCTRERP Section III.A-D states that incidents are classified by the affected FNF according to the possible safety consequences to persons in the Emergency Planning Zone. As conditions change, the ECL must be changed and state and local responders must be notified. Actions to be taken by the Nuclear Response Emergency and Environmental Surveillance Section (NREES)/DHEC in response to each ECL are defined. Each response builds on the responses required for lower ECLs, and assumes that those actions have been or will be taken as necessary.

Fairfield, Lexington, Newberry and Richland Counties establish the ECLs and expected local actions consistent with each ECL. Fairfield and Newberry Counties establish the ECLs in Annex Q. Lexington County establishes them in their Annex 25a and Richland County addresses ECLs in Section IV.D

E. Notification Methods and Procedures

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.

Evaluation: Adequate

Statement

SCORERP Section IV.3 states: The ECL level determines the degree of licensee, state, and local response as outlined in Appendix 3. Off-site response will be initiated by state and local forces as recommended by DHEC and/or the FNF. Details on the notification process and verification process are located in Annex A. SCORERP Annex A.III states that the licensees in conjunction with state and local emergency management organizations have established mutually agreeable measures for prompt notification of emergencies consistent with the ECL scheme discussed in the Basic Plan, paragraph IV. B. 1 and Appendix 3. These measures are designed to provide offsite decision makers with information on the class of emergency, whether a release is taking place, the potentially affected population and areas and whether protective actions may be necessary.

SCORERP Section IV.B gives instructions to ensure public understanding of emergency protective action instructions, the SCEMD Public Information Officer will publish and transmit, immediately upon completion of EAS message broadcast, a follow-on emergency news release to participating media stations and the South Carolina Educational Television Network (SCETV) that will contain familiar landmark descriptions of all zones where protective actions are required. Annex C discusses the need to provide for direction and control in the dissemination of official statements, information (news releases), and Emergency Alert System (EAS) messages by state government during a FNF incident. SCORERP Section IV.B gives instructions for disseminating information and Annex C details the process and predefined messages.

SCORERP Part 3 Section IV.B states: Alert and Notification procedures are designed to inform and instruct the populace in emergency planning zones, and also to notify federal, state and local Radiological Emergency Response (RER) forces. In the event of an incident at VCSNS, the primary means for notifying off-site response forces is the Electronic Switch System Exchange (ESSX), a dedicated circuit ring-down telephone system. Backup to the ESSX are commercial telephone lines and the Local Government Radio (LGR). A fixed siren system is the primary means of alerting the public within the 10-mile EPZ. Emergency protective action instructions for the public will be broadcast over the Emergency Alert System (EAS). SCORERP Part 3 Annex A contains details the process for alerting and notifying the public.

SCORERP Section IV.B.2 states that once the decision is made, the SEOC Operations Officer will coordinate siren sounding and EAS activation by participating radio stations listed in Parts 1 through 6, this plan. Sample EAS messages which contain all necessary elements are found in Annex C, Appendix 2. SCORERP Section IV.B.3 then states: To ensure public understanding of emergency protective action instructions, the SCEMD Public Information Officer will publish and transmit, immediately upon completion of EAS message broadcast, a follow-on emergency news release to participating media stations and the South Carolina Educational Television Network (SCETV) that will contain familiar landmark descriptions of all zones where protective actions are required. Descriptions of familiar landmarks throughout each 10-mile EPZ protective action zone are contained in Parts 1 through 6, of this plan. Annex C provides specifics on who is responsible for conducting briefings, frequency, message content and rumor control.

All County plans address and establish procedures for mutually agreeable basis for notification of response organizations consistent with ECLs established through appendices, matrices and attachments, and includes message verification processes. Plans detail procedures for alerting, notifying and mobilizing emergency personnel and populace in the plume EPZ. Each plan also addresses and establishes a system that compliments its alert, warning and notification system that provides for ensuring that the public understands emergency protective action instructions distributed as public information and a standard dissemination process for initial and follow-up messages that includes appropriate broadcast media such as the Emergency Alert System, that conform with administrative and physical means established with time requirements for providing prompt instructions to the public affected by and in the EPZ. Additionally, all plans adequately address in Public information procedures, written messages intended for the public that are consistent with licensees' classification scheme.

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

Evaluation: Adequate.

Statement:

The SCORERP and the Fairfield, Lexington, Newberry and Richland County response plans for the VCSNS state that the State and counties have the ability for 24-hour per day notification to and activation of the State/local emergency response network and manning of communications links that initiate emergency response actions. Provisions have been made for communication networks to support emergency response organizations throughout the course of an emergency and to assure that an immediate level of alert and notification readiness is available and the various warning points are staffed 24 hours a day.

The State and counties have several methods of maintaining communications with other organizations and agencies during an emergency including: commercial telephone, satellite radio/telephone, two-way radio, fax and DCI are the back-up means of communications. The FEMA National Radio System (FNARS) has terminals installed in State EOCs providing voice radio or Teletype communication among state governments. The National Warning

System (NAWAS) has terminals located at the State EOC and the State and County Warning Points and National Weather Service Offices.

The State and County Warning Points will receive initial notification of any event at the licensee and initiate callout of designated emergency response personnel.

The SCORERP states that communications with local governments within the 10 mile EPZ is tested monthly and communications with federal emergency response agencies is tested quarterly. Communications between the nuclear site, state, and local EOCs and field assessment teams is tested annually.

G. Public Education and Information: 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.

Evaluation: Adequate

Statement:

Through the distribution of the annual safety information brochure the State of South Carolina in conjunction with Fairfield, Lexington, Newberry, and Richland Counties and V. C. Summer Nuclear Site provide the residents of the plume exposure emergency planning zone with information concerning radiation, what to do in the event of emergency, possible protective actions, who to contact for additional information and obtaining assistance during an emergency if they have special needs.

The dissemination of information to the transient population is accomplished by providing access to educational materials at appropriate locations, including facility visitors' centers, motel/hotel lobbies, train stations, parks, campgrounds, recreation areas and other public areas. Responsibility for reviewing, auditing and content are delegated to the licensee.

The State of South Carolina and Fairfield, Lexington, Newberry and Richland Counties have designated the point of contact for the media and identified the locations for use by the media. The SCORERP designates the SCEMD as the public information director with the facility/utility furnishing telephone support at the JIC.

Fairfield, Lexington, Newberry and Richland County emergency response plans designate a point of contact and identifies a location for the media to use. Unless announced otherwise, the Governor's Press Secretary or Public Information Director will assume direct responsibility for coordination of state emergency public information and issuance of news releases. The state public information coordinator will coordinate public information and EAS activities at the SEOC and will maintain effective coordination and communication with the public information director at the JIC. Public information releases originating from the

SEOC will be coordinated with and approved by the Governor's press secretary or designated representative.

The State of South Carolina detects rumors through processes that involve the monitoring of mass news media or talking directly to the public. The State responds to rumors by gathering accurate and timely information, by coordinating with all responding sources, and by using media and person-to-person communication to disseminate accurate and timely information, thereby discrediting that which is untrue.

Fairfield, Newberry and Richland Counties emergency response plans establish responsibility for rumor control. Lexington County does not specifically mention rumor control responsibilities under the duties of the Public Information Officer.

The State of South Carolina and V.C. Summer Nuclear Station conduct annual media workshops to review procedures for the release and dissemination of information during an incident.

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

Evaluation: Adequate

Statement:

The SCOREP identifies the location of the SEOC and the alternate EOC. The SCEOP gives detailed instructions and guidance on activation and staffing of the SEOC. In the event of an incident at a FNF, the state will activate its dosimetry redistribution plan. Monitoring equipment is pre-positioned in strategic locations in risk and host counties. The SCORERP has a table detailing the type of equipment and quantity by location. The SCSTRERP tasks the State to procure adequate supplies of Potassium Iodide to provide a stockpile near each FNF. There is also a requirement for a reserve stockpile to be maintained in Columbia and be available for rapid delivery.

The State calibrates their equipment in accordance with the manufactures' recommendations. The SCTRERP describes quarterly inspections, inventory, operational checks after each use and/or monthly and calibration at least annually.

SCTRERP Appendix IV identifies radiological emergency response equipment to be issued to FNF risk and host counties.

When the FEOC is operational, all field monitoring data will be transmitted to the Bureau of Land and Waste Management (BLWM) representative at the FEOC. If the FEOC has not been activated, all field monitoring data will be transmitted to the Mobile Radiological Laboratory (MRL). Environmental samples will be transported either to the MRL when it is deployed or to the Radiological Laboratory in Columbia.

Fairfield, Lexington, Newberry and Richland Counties' emergency response plans address

location, activation and staffing of their EOC's and supporting facilities.

Richland and Lexington Counties have no off-site radiological equipment for use near the facility, but, in accordance with SCTRERP, DHEC will establish in-place monitoring and sampling stations. Fairfield and Newberry Counties' emergency response plans address monitoring and off-site monitoring equipment.

Counties are not responsible for emergency kits per the plan. In accordance with the STRERP, emergency kits are provided by DHEC to the counties.

Fairfield, Lexington, Newberry and Richland Counties' emergency response plans state that DHEC, as outlined in the STRERP, is responsible for the receipt and analysis of all field monitoring data.

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

Evaluation: Adequate

Statement:

SCEOP Annex 10 states that ESF 10 (Hazardous Materials) DHEC will be responsible for coordinating radiological monitoring operations. DHEC will deploy radiological monitoring field teams with equipment and the expertise necessary to detect and measure airborne radiation and radioactive particulate depositions on the ground. Field data gathered will be compared with information and recommendations from the FNF to locate the radioactive plume and project or determine potential dose to the general public and emergency workers.

SCTRERP Section B describes the general notification processes for the fixed nuclear facilities utilizing dedicated notification systems. NREES is notified by the State Warning Point and after hours the NREES Duty officer will be notified. In addition an Action Flow Chart is included that describes the system of notification, alerting, and activation of the SCDHEC Emergency Teams.

The SCTRERP describes the primary responsibilities of NREES as providing technical assistance in evaluating the actual and potential consequence of an incident and providing protective action recommendations. In order to carry out these major responsibilities NREES will employ field monitoring teams, environmental sampling teams, mobile and fixed laboratory facilities, health physicists, advisors, and emergency coordinators.

SCTRERP Appendix III Sections II and III specify the actions the BLWM will take to assess the impact of actual releases. By measuring contamination levels or concentrations of radioisotopes in air and water doses can be calculated for comparison with the PAGs. The BLWM in coordination with the Division of Radiological Environmental Monitoring shall establish a central point during emergency operations for the receipt and analysis of field monitoring data and the coordination of environmental biological samples collected. When

the FEOC is operational, all field monitoring data will be transmitted to the BLWM representative at the FEOC. If the MRL has been deployed but the FEOC has not been activated, all field monitoring data will be transmitted to the MRL. Environmental samples will be transported either to the MRL or to the Radiological Laboratory in Columbia field, at the discretion of the Nuclear Response and Emergency Environmental Surveillance Field Director or Environmental Surveillance Coordinator. SCTRERP Appendix IV lists the monitoring and communication equipment and supplies available for field teams and laboratories.

State response and support will be available within three hours of the initiation of an emergency condition. Immediate technological support will be available from DHEC based on the most expeditious means of transportation to the county from Columbia.

Fairfield, Lexington, Newberry, and Richland Counties' Plans state that accident assessment is a State responsibility and references the SCTREPP. The counties' plans also state that DHEC is responsible for providing radiological monitoring services and equipment and lists services and equipment that DHEC can supply to support the counties.

- J. Protective Response:** 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.

Evaluation: Adequate

Statement:

The State of South Carolina and Fairfield, Lexington, Newberry, and Richland Counties have plans in place to provide appropriate protective actions to protect emergency workers and the general public. Protective action guides are consistent with FDA and EPA guidelines. The counties have appropriate methods for alerting, evacuating, monitoring and decontaminating members of the general public.

In accordance with State plans DHEC will continually assess the gravity of the situation by evaluation of reported radiological release data from the impacted FNF, analysis of field environmental sampling data, and consultation with the NRC. Based on dose assessment data and/or the potential for plant conditions to further deteriorate, DHEC will provide protective action recommendations (PAR) to the Governor or the Director of SCEMD. PARs will, in turn, be coordinated with each impacted county to obtain consensus. Once all parties in the decision making chain are in agreement, Protective Actions will be established by SCEMD and executed in accordance with procedures contained in FNF Site Specific plans.

Based on comparisons of projected or actual dose measured and EPA protective action

guidance (Annex F), DHEC will promptly recommend, to SCEMD and State government decision makers, protective actions to shelter and/or evacuate the population. DHEC will also make recommendations concerning the issuance and ingestion of potassium iodide (KI) to emergency workers, mobility-impaired individuals and the general public. They will also recommend the commencement of monitoring and decontamination activities for evacuees.

Fairfield, Lexington, Newberry, and Richland Counties' plans address implementing actions to protect the health and safety of the public in accordance with guidance from DHEC or ordered by the Governor. They also specify the use of the SCORERP as a reference.

Evacuation Zones, Landmark and Boundary Descriptions are described in detail, the Table to Figure 1 of the SCORERP describes the main evacuation routes and Figure 3 shows the population density and a population distribution map of South Carolina for the VC Summer Plant. Maps maintained by BLWM show the environs of each fixed nuclear facility in the state. The maps show the location of facility, evacuation routes, relocation and personnel assembly areas, sampling locations, and survey points. In addition, features such as dairy farms, water treatment plants, airports and airstrips, hospitals, schools, industrial plants, etc. are shown.

Fairfield and Newberry Counties' plans identify and address locations of shelters and relocation centers, evacuation routes, and population distribution. Lexington and Richland Counties' plans address reception centers, evacuation routes and population distribution, however, both counties rely on hotels to provide shelter for evacuees and have made arrangements with VCSNS and the Greater Columbia Hospitality Association.

Procedures for the prompt notification of the public within the 10-mile plume emergency-planning zone (10-mile EPZ) of the VCSNS focus on state and local coordination of fixed siren activation and broadcast of Emergency Alert System (EAS) messages that contain clear protective action instructions based on decisions by appropriate government officials. Dissemination of information to the transient population will be accomplished by providing access to educational materials at appropriate locations, including facility visitors' centers, motel/hotel lobbies, train stations, parks, campgrounds, recreation areas and other public areas.

Fairfield, Lexington, Newberry, and Richland Counties' plans address alerting and notifying the public, ensuring initial notification covers essentially 100% of the population, making special arrangements to ensure 100% coverage within 45 minutes for the population that may not have received the initial notification and providing information to all within the 10-mile EPZ and providing information and instructions to transients.

KI tablets have been pre-distributed to the general population who reside within 10 miles of VCSNS. Additional quantities of KI, stockpiled at DHEC and county public health departments, will be transported on order to school pick-up points, reception centers and shelters for emergency distribution. Information on the availability of KI and locations where it can be obtained is published annually in VCSNS emergency information brochures/calendars that are distributed to all 10-mile EPZ residents. KI shall be taken only upon order of the S.C. DHEC Commissioner or designee. KI tablets for emergency workers

are pre-distributed to each risk county health department. Subject to the approval of DHEC, KI may be pre-distributed to the county emergency management agency. KI may be issued to individual emergency workers at the Alert Emergency Classification Level (ECL) and will be issued to emergency workers at the Site Area Emergency ECL.

Emergency transportation services are the primary responsibility of the affected county. County procedures and the means for the evacuation of residents who may be immobilized through institutional confinement or other factors are contained in county EOPs. In the event that county emergency transportation resources are insufficient to complete a required evacuation of the population or to provide other essential transportation services during a radiological emergency, back-up transportation support may be requested from the state. Specific evacuation routes, time estimates and routes are listed in SCORERP Part 3 Section IV.B.

The State plan states that all evacuees will be processed through the reception centers or shelters as outlined in SCORERP Annex B. Each evacuee will be monitored, registered, and processed including those who elect not to accept temporary shelter. Each county will maintain records for contacting evacuees for use in traffic control and re-entry purposes. Temporary housing should be located at least five miles from the 10-mile EPZ outer boundary (15 miles from the nuclear facility site.).

Fairfield, Lexington, Newberry, and Richland Counties' plans address and identify reception centers and Fairfield and Lexington Counties identify shelters located beyond the plume exposure EPZ.

SCORERP Appendix 5 gives the responsibility for coordinating security and access to evacuated and restricted areas during a fixed nuclear facility (FNF) emergency to SLED, under the auspices of ESF 13. At Site Area Emergency, or as directed by the SEOC Chief of Operations, ESF 16 (SCHP), in coordination with local law enforcement agencies, will occupy Traffic Control Points (TCPs) designated in respective site specific plans; and in cooperation with the Department of Natural Resources, coordinate the clearance of all lakes and waterways within the 10-mile EPZ, and establish 2-mile road blocks from the FNF to restrict access to the facility either by road or water. Access to the FNF will be granted only to bona fide facility employees, emergency workers and government officials e.g., (representatives of the NRC).

The Sheriff (as Chief Law Enforcement Officer of the affected county) will, in coordination with the SCHP and other law enforcement agencies, coordinate evacuation activities in accordance with the affected county EOP.

The South Carolina Department of Transportation (DOT) will coordinate transportation support operations under the auspices of ESF 1 (Transportation) as delineated in Annex 1 of the SCEOP. In the event that county emergency transportation resources are insufficient to complete a required evacuation of the population or to provide other essential transportation services during a radiological emergency, back-up transportation support may be requested from the state.

Evacuation time studies for each 10-mile EPZ evacuation zone have been prepared by the various utilities and are a part of the individual FNF emergency plan. Portions of these studies e.g., (population densities, evacuation times and route capacities) have been excerpted from FNF emergency evacuation plans and are included in county EOPs and Site Specific annexes to the SCORERP.

The SCORERP describes the overall mission and the reasoning behind protective action decisions. The State believes that rapid action will be needed to protect members of the general public during an incident involving a large release, or having the potential for a large release, of radioactive materials to the atmosphere. Consideration of all risks is important in determining the appropriate response recommendation; protective actions should not expose individuals to greater risks than the risk avoided. Sheltering may be preferable to evacuation as a protective action in some situations. Because of the higher risk associated with evacuation of some special groups in the population (e.g., those who are not readily mobile), sheltering may be the preferred alternative for such groups as a protective action at projected doses up to 5 rem. In addition, under unusually hazardous environmental conditions use of sheltering at projected doses up to 5 rem to the general population (and up to 10 rem to special groups) may become justified. Sheltering may also provide protection equal to or greater than evacuation due to the nature of the source term and/or in the presence of temporal or other site-specific conditions. Some judgment will be necessary when considering the types of protective actions to be implemented and at what levels in an emergency situation. Although the PAGs are expressed as a range of 1-5 rem, the SCORERP emphasized that, under normal conditions, evacuation of members of the general public should be initiated for most incidents at a projected dose of 1 rem.

Environmental sampling outside the 10-mile EPZ will be directed by DHEC to define the limits of the area of radiological deposition and to begin defining levels of radioactive contamination in milk, foodstuffs, meat, other livestock, poultry and water. DHEC maintains records to facilitate the implementation of ingestion protective actions. The records include the locations of major food producers, processors, distributors, dairies, and surface water systems within the ingestion pathway emergency planning zone (IPZ) for all FNFs affecting South Carolina. DHEC, in coordination with South Carolina Department of Agriculture (SCDA), Clemson University Livestock – Poultry Health (CULPH) and Clemson University Cooperative Extension Service (CUCES), is responsible for the development of procedures for utilizing this information to keep affected food producers, processors, and distributors informed about protective actions and required post-incident response actions. This information is updated annually by SCDA, CULPH, and CUCES. Maps for recording information on the status of the emergency and for monitoring key land use and other ingestion-related data are developed and maintained by county agricultural or extension agents.

SCORERP Part 5 Annex B states Reception centers and shelters are staffed by ARC, Department of Social Services (DSS), medical, DHEC and radiological monitoring personnel to provide for:

- i. Registration of evacuees
- ii. Assignment of evacuees to additional shelters or temporary lodging facilities if

- the primary shelter is filled to capacity
- iii. Radiological monitoring of evacuees and their vehicles for contamination
- iv. Decontamination of evacuees and their vehicles, if necessary
- v. Immediate first aid and coordination of medical care for evacuees
- vi. Basic personal needs for evacuees

Fairfield, Lexington, Newberry, and Richland Counties have accepted by resolution the 10 mile Emergency Planning Zone (EPZ) for the existing VCSNS Unit 1 as the 10 mile EPZ for the proposed VCSNS Units 2 and 3.

K. Radiological Exposure Control: 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.

Evaluation: Adequate

Statement:

The State of South Carolina and Fairfield, Lexington, Newberry, and Richland Counties have plans and procedures for monitoring and controlling emergency workers' exposure. State and County Protective Action Guides are consistent with the EPA's guidelines.

The SEOC will provide incident assessment and dose projection information to affected counties and State RER agencies. County emergency management directors and State RER agency chiefs are responsible for monitoring the exposures received by their respective emergency workers and for ensuring that exposures do not exceed dose limits as specified in Table B, Annex F. All 10-mile EPZ emergency workers, or emergency worker teams, will be provided personal dosimetry, i.e., Self-Reading Dosimeters (SRDs), Permanent Record Dosimeters (PRDs) and the thyroid-blocking agent, potassium iodide (KI). Emergency workers will periodically read and maintain a record of individual radiation exposures in accordance with the procedures outlined in Annex F, Attachment 3.

Throughout the incident, DHEC will constantly monitor both State and local emergency worker exposure rates and accumulated doses to assure prompt and accurate protective action guidance is provided.

SCORERP Annex F IV.A assigns responsibility to SCEMD to distribute dosimetry and coordinates emergency distribution of dosimeters to risk and host county emergency management agencies, and collects PRDs, personnel and equipment monitoring records from the affected county after each incident.

Fairfield, Lexington, Newberry, and Richland Counties' plans address 24hr dose capability, provision for issue of dosimeters, and emergency worker exposure control.

Emergency workers may be authorized by DHEC to exceed exposure levels specified in Protective Action Guides (PAGs). All others, including county and municipal employees serving as radiological emergency workers, will be authorized to exceed PAG exposure levels in the following manner:

- i. The DHEC Radiological Emergency Response Coordinator recommends exposure level limitations to the Director, SCEMD
- ii. The SCEMD Director passes recommendations to the County Emergency Management Director, who makes a recommendation to the Chairman, County Council/Administrator/Supervisor
- iii. County authorities (Chairman, County Council/Administrator/ Supervisor), with DHEC consent, will authorize emergency workers to exceed specific radiation level limits specified in the General Public Protective Action Guides.

Monitoring stations for emergency workers are provided by each risk county emergency management agency. After monitoring procedures have been placed in effect by SCEMD, and upon completion of his/her mission or more often as directed by supervisors, each emergency worker must report to a monitoring station or a reception center monitoring point to be monitored for radiological contamination, and if necessary, to be decontaminated. Monitoring and decontamination procedures for emergency workers, vehicles and equipment are the same as those used for evacuees. Contamination levels are stated in the State and county plans and decontamination methods are also discussed.

L. Medical and Public Health Support: Arrangements are made for medical services for contaminated injured individuals.

Evaluation: Adequate

Statement:

The State of South Carolina and Fairfield, Lexington, Newberry and Richland Counties have identified primary and alternate hospitals, medical services and transportation and indicated the staff of the identified medical services and facilities is adequately prepared to treat contaminated individuals from both the general public and plant. The State of South Carolina has listed each medical facility throughout the state by name, location and capability to treat radiological contaminated patients and in the event of an accident where need exceeds capacity, letters of agreement with other states and facilities are in place.

SCORERP Part 3, Annex C addresses letters of agreement with primary and alternate hospitals having the capability to receive and care for most radiological contaminated individuals as well as transportation of those individuals. Training of medical care givers is addressed in SCORERP Annex B, and a list indicating location of medical service facilities is addressed in SCORERP, Annex E, Appendix 3.

M. Recovery and Reentry Planning and Post accident Operations: General plans for recovery and reentry are developed.

Evaluation: Adequate

Statement:

The State of South Carolina and Fairfield, Lexington, Newberry, and Richland Counties have plans and procedures for recovery and reentry that include processes to make protective action decisions, to inform organizations of changes in status and capability to track total population exposure.

Radiological monitoring, exposure evaluation, and the decision for recovery and re-entry will be the responsibility of the BLWM. BLWM will consult with the Nuclear Regulatory Commission, officials of the fixed nuclear facility, local government and other technical agencies before recommending re-entry.

SCORERP Section IV.B states that during recovery operations, SLED, in cooperation with all state and local law enforcement agencies, DHEC, CUES and the SCDA will develop and implement plans for maintaining access control to all evacuated areas and for permanent or long-term access control to remaining restricted areas. In further support of recovery operations, SLED will assist with the development and implementation of plans to embargo or restrict transportation of contaminated food products and will assist special groups such as farmers or other individuals performing missions involving maintenance and disposition of livestock and food products.

The BLWM shall advise the SCEMD that recovery and re-entry may be made into the evacuated area. SCEMD is expected to notify other response organizations of the plan of action. Decisions to relax protective measures and allow recovery and re-entry into an evacuated area require a continuous estimate of the radiological situation. The estimate and calculation is accomplished by the analysis of radiological monitoring data from air samples, milk, water, and direct radiation measurements. Re-entry will be authorized when projected doses fall below 20% of the appropriate PAG and when surface contamination is reduced below the limits stated in the plan.

SCTRERP Appendix III states that the total projected exposure due to actual or projected releases is the product of individual exposure and population affected. Sector population will be obtained from SCORERP and the Utility. Evacuation time studies for each 10-mile EPZ evacuation zone have been prepared by the various utilities and are a part of the individual FNF emergency plan. Portions of these studies e.g., (population densities, evacuation times and route capacities) have been excerpted from FNF emergency evacuation plans and are included in county EOPs and Site Specific annexes to the SCORERP.

Fairfield, Lexington, Newberry, and Richland Counties' plans defer to guidance, oversight and compliance from DHEC, SEOC and procedures outlined in SCTRERP.

N. Exercises and Drills: 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.

Evaluation: Adequate

Statement:

The State of South Carolina and South Carolina Counties of Fairfield, Lexington, Newberry and Richland identify the reason and purpose for conducting drills and exercises. Plan and or participant shortcomings that are identified as a result of drills and exercises are to be corrected through plan revisions and training modification. The State and Counties will conduct varying exercises every two years and the scenario will include an off-site release or potential thereof to assure the response by risk county agencies. Communication drills are conducted by the State and Counties on a monthly basis, Health Physics drills are conducted semi-annually and medical drills with either the primary or alternate hospital involving a simulated contaminated individual as well as radiological monitoring drills are conducted annually.

Each county describes how exercises are to be carried out with objectives, dates, time periods, places, participating organizations, schedule of real and simulated events, exercise conduct and advanced observer material needs being addressed. Critique provisions for official observers from Federal, State or local governments and methods of implementing corrective actions are addressed by each organization.

South Carolina Code of Regulations 58-1 and 58-101 assigns drill and exercise responsibility as specified in NUREG-0654, FEMA REP-1, Rev.1. SCORERP, Annex D describes training, exercises, conduct and frequency of drills and exercises.

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

Evaluation: Adequate

Statement:

SCEMD is responsible for ensuring the availability of training opportunities for all agencies and individuals involved in emergency response to an incident at a nuclear power plant. State and local directors/coordinators and key personnel participate in applicable independent study courses, radiological courses and federal/state workshops and seminars

SCEMD is also responsible to coordinate with DHEC for specific radiological emergency response training for appropriate state and local government personnel. Training includes but is not limited to radiation protection, survey, communications, assessment, dosimetry and decontamination.

County emergency preparedness directors/coordinators are responsible for coordinating the

training of local radiological emergency response personnel and facilitating their attendance at SCEMD sponsored training. SCEMD will make use of the train-the-trainer concept to ensure state agencies (SLED, DPS, DNR, etc.) and local fire, police and medical organizations have qualified instructors for maintenance of internal personnel capabilities. In support of state and county radiological emergency response training, SCEMD will conduct an annual training needs assessment of state agencies and fixed nuclear facility counties to determine specific requirements for courses.

The information derived from this assessment will be used to develop an annual training program that will integrate initial radiological emergency response training for new personnel, annual refresher training, on-the-job training, periodic drills and exercises. Specified training is dependent on mission responsibilities with accommodations for mutual aid partners, requirements for instruction and qualifying personnel and frequency of training being addressed in SCORERP Section V, Annex B and SCTRERP Appendix IX.

- 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.

Evaluation: Adequate

Statement:

SCEMD is responsible for ensuring the availability of training opportunities for all agencies and individuals involved in emergency response to an incident at a nuclear power plant. State and local directors/coordinators and key personnel participate in applicable independent study courses, radiological courses and federal/state workshops and seminars. SCEOP, Section III.F and each county plan identifies by title the overall authority and responsibility for radiological emergency response planning and designates by title the responsibility of plan development and updates.

SCORERP states radiological emergency response plans will be reviewed annually and updated as required. SCTRERP, Section B. XIII states plan review will be on a continual basis and verification to be current on an annual basis. If major changes occur prior to due date of annual revision, the plans will be immediately changed to reflect capabilities. The approved changes to the plans shall be forwarded to all organizations and appropriate individuals with implementation responsibility. The revised pages, sections and appendix shall be dated and/or marked to indicate change. The Lexington, Newberry and Richland county plans do not address a specification to consider changes identified by drills or exercises nor do they make reference to date and mark revisions to identify changes.

Each plan contains a table of contents. SCORERP Appendix 1, SCEOP Section IX and county plans with the exception of Lexington County, lists supporting plans and responsible organizations with an appendix listing by title and procedures required to implement the plan. Each plan with the exception of Fairfield and Lexington County, include provisions for updating telephone numbers in emergency procedures at least quarterly.

III. Schedule of Pending Actions

There are no items that require tracking.

IV. Post COL Reasonable Assurance Tracking

There are no items that require post COL tracking.

V. Composite Rating Summary

Review and Evaluation of Emergency Preparedness Plans and Procedures for the V.C. Summer Nuclear Station, Units 2 and 3, against the Planning Standards of NUREG-0654/FEMA-REP-1, Rev. 1, as amended (Evaluation Elements applicable only to utilities not listed.)

Element	Rating					Element	Rating				
	South Carolina	Fairfield	Lexington	Newberry	Richland		South Carolina	Fairfield	Lexington	Newberry	Richland
A.1.a	A	A	A	A	A	J.10.g	A	A	A	A	A
A.1.b	A	A	A	A	A	J.10.h	A	A	A	A	A
A.1.c	A	A	A	A	A	J.10.i	A	A	A	A	A
A.1.d	A	A	A	A	A	J.10.j	A	A	A	A	A
A.1.e	A	A	A	A	A	J.10.k	A	A	A	A	A
A.2.a	A	A	A	A	A	J.10.l	A	A	A	A	A
A.2.b	A	A	A	A	A	J.10.m	A	NA	N A	NA	NA
A.3	A	A	A	A	A	J.11	A	NA	N A	NA	NA
A.4	A	A	A	A	A	J.12	A	A	A	A	A
C.1.a	A	NA	NA	NA	NA	K.3.a	A	A	A	A	A
C.1.b	A	NA	NA	NA	NA	K.3.b	A	A	A	A	A
C.1.c	A	A	A	A	A	K.4	A	A	A	A	A
C.2.a	A	A	A	A	A	K.5.a	A	A	A	A	A
C.3	A	NA	NA	NA	NA	K.5.b	A	A	A	A	A
C.4	A	A	A	A	A	L.1	A	A	A	A	A
D.3	A	A	A	A	A	L.3	A	NA	N A	NA	NA
D.4	A	A	A	A	A	L.4	A	A	A	A	A
E.1	A	A	A	A	A	M.1	A	A	A	A	A
E.2	A	A	A	A	A	M.3	A	NA	N A	NA	NA
E.5	A	A	A	A	A	M.4	A	NA	N A	NA	NA
E.6	A	A	A	A	A	N.1.a	A	A	A	A	A
E.7	A	A	A	A	A	N.1.b	A	A	A	A	A
F.1.a	A	A	A	A	A	N.2.a	A	A	A	A	A
F.1.b	A	A	A	A	A	N.2.c	NA	A	A	A	A
F.1.c	A	A	A	A	A	N.2.d	A	A	A	A	A
F.1.d	A	A	A	A	A	N.2.e	A	NA	N	NA	NA

									A		
F.1.e	A	A	A	A	A	N.3.a	A	A	A	A	A
F.2	A	A	A	A	A	N.3.b	A	A	A	A	A
F.3	A	A	A	A	A	N.3.c	A	A	A	A	A
G.1	A	A	A	A	A	N.3.d	A	A	A	A	A
G.2	A	A	A	A	A	N.3.e	A	A	A	A	A
G.3.a	A	A	A	A	A	N.3.f	A	A	A	A	A
G.4.a	A	A	A	A	A	N.4	A	A	A	A	A
G.4.b	A	A	A	A	A	N.5	A	A	A	A	A
G.4.c	A	A	A	A	A	O.1	A	A	A	A	A
G.5	A	A	A	A	A	O.1.b	A	A	A	A	A
H.3	A	A	A	A	A	O.4.a	A	A	A	A	A

Element	Rating					Element	Rating				
	South Carolina	Fairfield	Lexington	Newberry	Richland		South Carolina	Fairfield	Lexington	Newberry	Richland
H.4	A	A	A	A	A	O.4.b	A	NA	NA	NA	NA
H.7	A	A	A	A	A	O.4.c	A	NA	NA	NA	NA
H.10	A	A	A	A	A	O.4.d	A	A	A	A	A
H.11	A	A	A	A	A	O.4.f	NA	A	A	A	A
H.12	A	A	A	A	A	O.4.g	NA	A	A	A	A
I.7	A	A	A	A	A	O.4.h	A	A	A	A	A
I.8	A	A	A	A	A	O.4.j	A	A	A	A	A
I.9	A	NA	NA	NA	NA	O.5	A	A	A	A	A
I.10	A	NA	NA	NA	NA	P.1	A	A	A	A	A
I.11	A	NA	NA	NA	NA	P.2	A	A	A	A	A
J.2	A	A	A	A	A	P.3	A	A	A	A	A
J.9	A	A	A	A	A	P.4	A	A	A	A	A
J.10.a	A	A	A	A	A	P.5	A	A	A	A	A
J.10.b	A	A	A	A	A	P.6	A	A	A	A	A
J.10.c	A	A	A	A	A	P.7	A	A	A	A	A
J.10.d	A	A	A	A	A	P.8	A	A	A	A	A
J.10.e	A	A	A	A	A	P.10	A	A	A	A	A
J.10.f	A	A	A	A	A						

A - Adequate

VI. Reasonable Assurance

After a thorough review of currently available Offsite Plans and Procedures, based upon the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1, a determination has been made that the plans are adequate and there is Reasonable Assurance that the plans can be implemented with no corrections needed. A qualifying REPEX will be demonstrated by the V.C. Summer Nuclear Power Plant in conjunction with offsite State and County participation.