

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 STELLO, V.      Ofc of the Executive Director for Operations

SUBJECT: Updates status of offsite radiological emergency planning & preparedness for plant.

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# Federal Emergency Management Agency

Washington, D.C. 20472

MAR 30 1988

Mr. Victor Stello, Jr.  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stello:

The purpose of this letter is to update you on the status of offsite radiological emergency planning and preparedness for the Duane Arnold Energy Center. This status report is the result of an ongoing review of the Iowa State and local plans and preparedness site-specific to the Duane Arnold Energy Center by the Federal Emergency Management Agency (FEMA) Region VII staff and the Regional Assistance Committee (RAC).

As background information, a FEMA review of offsite planning for Duane Arnold in February 1987, revealed that areas of the Cities of Cedar Rapids and Marion, Iowa, beyond the identified 10-mile plume emergency planning zone (EPZ), were not included in the offsite emergency planning effort. This was contrary to written information indicating that these areas were actually included which had been provided to the public by the Iowa Electric Light and Power (IELP) Company and contrary to the documentation that had been forwarded by the State of Iowa and the local jurisdictions to FEMA to support the review of plans and preparedness under FEMA Rule 44 CFR 350. The emergency information brochures distributed to the public provided instructions for the evacuation of residents for those areas of Cedar Rapids and Marion beyond the 10-mile EPZ; however, these areas had not been provided alerting coverage nor was there planning in existence to implement protective actions in these areas.

Subsequent to the identification of these problems, the State of Iowa and local governments, IELP, FEMA, and the Nuclear Regulatory Commission (NRC) Region III all agreed that an expansion of planning efforts to include all of Cedar Rapids and Marion was warranted. As a result, the Iowa Disaster Services Division was notified on April 9, 1987, that eight overall planning inadequacies associated with the inclusion of Cedar Rapids and Marion would have to be corrected in the appropriate offsite plans and all affected parties were in agreement that corrected plans would be submitted to FEMA for review by December 31, 1987. Revised plans were submitted by the State of Iowa by the end of December 1987; however, a review of these plans by FEMA Region VII and the RAC have disclosed that of the original planning problems identified, significant inadequacies encompassing the school evacuation procedures, the Reception/Host Counties Plans, the Evacuation Time Study, radiological monitoring, the Emergency Broadcast System (EBS), the mobility impaired, and others, still exist.

The Iowa Disaster Services Division was notified of these remaining inadequacies in correspondence in January, February, and March 1988, and in consideration of the seriousness of these issues, they were requested to address and correct each one. A February 16, 1988, response from the State of Iowa on the school evacuation procedures was inadequate to address those identified concerns. At the present

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time, the following problems related to school evacuation procedures remain uncorrected:

- ° the plans submitted depend on the fact that 60% of the children being evacuated will be evacuated by parents or guardians; that planning contention is unsupported because of the submission of a flawed public notification procedure;
- ° insufficient space exists to accommodate students at the temporary relocation centers even if the plan proposal of 40% evacuation by school buses is supported and accepted by a clear resolution of the currently flawed public notification procedures;
- ° the plans fail to clearly state when school children will begin evacuation;
- ° the plans do not document the procedures and resources to evacuate students from the temporary relocation centers to the relocation/reception centers;
- ° the plans fail to document how long the students may be required to stay at the temporary relocation centers and the capabilities of those centers to accommodate the students for that period of time; and
- ° the plans fail to document that school bus drivers will be provided with dosimetry, training in its use, and the procedures for distribution.

In addition to the outstanding school evacuation inadequacies, the State of Iowa failed to respond to the Reception/Host Counties Plans and Evacuation Time Study inadequacies by March 7, 1988, as requested by FEMA Region VII; therefore, these inadequacies remain uncorrected at this time. Specific details on the inadequacies involving the school evacuation procedures, the Reception/Host Counties Plans, and the Evacuation Time Study, are outlined in a memorandum from Mr. Jerome D. Overstreet, FEMA Regional Director, to Mr. Grant C. Peterson, Associate Director, dated March 7, 1988. The March 7, 1988, memorandum, which includes copies of correspondence and a chronology of the actions that have been taken over the past year in an attempt to facilitate correction of these inadequacies is included as Attachment I to this finding.

Attachment II to this finding is a March 16, 1988, memorandum from FEMA Region VII to the Iowa Disaster Services Division outlining 56 additional inadequacies identified during the RAC review of the Linn and Host Counties Radiological Emergency Response Plans. There are 18 of these inadequacies that, we believe, along with the inadequacies identified above and in the March 7, 1988, memorandum (school evacuation procedures, Reception/Host Counties Plans, and Evacuation Time Study), impact public health and safety and form the basis of this finding. The 18 inadequacies in the March 16, 1988, memorandum that impact public health and safety are listed as Nos. 2, 3, 5, 8, 9, 12, 14, 16, 20, 22, 26, 31, 32, 38, 40, 48, 49, and 55.

In consideration of the the seriousness of the planning inadequacies identified above in the March 7 and March 16, 1988, memoranda, the amount of time that has been available for the correction of these inadequacies, and the failure of the State of Iowa and Linn County to complete satisfactory revisions to the plans to correct the inadequacies, we can no longer determine that there is reasonable assurance that the offsite radiological emergency planning site-specific to the

Duane Arnold Energy Center is adequate to protect the health and safety of the public in the event of an accident at the site. This finding is being forwarded to NRC in accordance with FEMA Rule 44 CFR 350.12 (c) which states "If, after formal submission of the State Plan, the Associate Director is not satisfied with the adequacy of the plan or preparedness with respect to a particular site, he or she shall concurrently communicate that decision to the Governor(s) of the State(s), the NRC, and the pertinent Regional Director, together with a statement in writing explaining the reasons for the decision and requesting appropriate plan or preparedness revision. Such statement shall be transmitted to the Governor(s) through the appropriate Regional Director(s). The Associate Director shall immediately publish a notice to this effect in the Federal Register."

At the request of the State of Iowa, a meeting was convened March 8, 1988, to discuss all of the unresolved planning inadequacies that have been identified to date site-specific to Duane Arnold. The serious inadequacies discussed above as well as all other inadequacies were discussed at this meeting. The results of this meeting are documented in a March 14, 1988, memorandum, included as Attachment III to this finding, from FEMA Region VII to the Iowa Disaster Services Division. A timetable for correction of the inadequacies was agreed upon by all parties present at the March 8, 1988, meeting as follows:

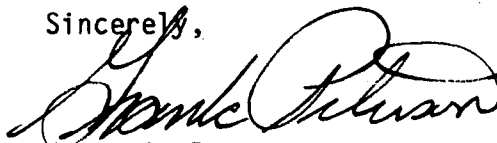
- April 8, 1988 - correction of school evacuation procedure inadequacies;
- May 6, 1988 - correction of Linn, Benton, and Reception/Host Counties plans, radiation monitoring, EBS, mobility impaired inadequacies;
- August 12, 1988 - correction of the Evacuation Time Study inadequacies;

This time schedule (except for the Evacuation Time Study) should allow the FEMA Regional Office sufficient time to review and approve all final plan amendments by July 1, 1988, so that the milestones for the September 1988 exercise can be met.

The plan revisions and corrections will be reviewed immediately upon receipt from the State of Iowa and we will reassess our position with regard to the adequacy of offsite plans at that time and, as appropriate, issue an updated finding.

If you have any questions regarding this finding, please contact Mr. Richard W. Krimm, Assistant Associate Director, at 646-2871.

Sincerely,



Grant C. Peterson  
Associate Director  
State and Local Programs  
and Support

ATTACHMENT I

Enclosure 1



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Sincerely,



Grant C. Peterson  
Associate Director  
State and Local Programs  
and Support



LICENSEE'S POSITION PAPER AS PRESENTED AT  
MEETING IN REGION III-NRC OFFICE  
ON APRIL 7, 1988

Iowa Electric strongly believes that offsite planning for the DAEC is adequate to protect the health and safety of the public in the highly unlikely event of a serious incident at the Duane Arnold Energy Center (DAEC) involving the release of radioactivity. However, we agree that improvements can and will be made to offsite plans for the DAEC. We will resolve all FEMA concerns expeditiously.

FEMA has observed and evaluated performance under the then effective offsite plans during every DAEC graded exercise except for the one conducted in 1987. Since the last major revision to the offsite plans in 1985, FEMA has evaluated two DAEC exercises, one in 1985 and another in 1986. Although deficiencies and corrective actions were identified, they did not indicate major flaws in the plans and were adequately corrected. FEMA transmitted the exercise evaluation report for the 1986 exercise (and 1/22/87 remedial exercise) to the NRC by letter dated May 22, 1987. In that letter FEMA stated that "...there is reasonable assurance that offsite plans and preparedness are adequate to protect the health and safety around the Duane Arnold site." The current revisions to the plans will not result in degradation from the previous situation, and should enhance several areas of interest to FEMA.

These plans have been reviewed and approved by local, county, and state officials who are intimately familiar with the community. They based their approval on their specific knowledge of the local geography, weather conditions, transportation networks, schools, emergency response resources, etc. The offsite plans are exercised approximately four times per year by State and local emergency response organizations in conjunction with Iowa Electric's onsite plans. As a result, State and local authorities understand the plans and have confidence in them.

The overall emergency planning effort for a nuclear power plant is a large and complex task which requires detailed plans and procedures for emergency response organizations, emergency response facilities and equipment, prompt alerting and notification, emergency communications, dose assessment, radiological monitoring, traffic control, etc. All of these areas have been repeatedly exercised and demonstrated to be adequate. The identified inadequacies relate primarily to the subject of evacuation (mostly post-evacuation issues outside the EPZ) and represents only a small portion of the total offsite planning effort.

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The inadequacies FEMA has cited fall into three major categories: school evaluation plans, host county plans, and evacuation time estimates.

#### School Evacuation Plans

The principal issues which we understand to be of concern to FEMA regarding school evacuation relate to problems associated with the temporary relocation centers outside the EPZ. Most of the temporary relocation centers are more than five miles outside of any EPZ boundary. Two of these facilities, one at 4.2 miles and another at 4.8 miles, are within five miles of the EPZ. Based on our research and discussions with the affected school superintendents, we are confident that school children will be expeditiously transported outside of the EPZ. Therefore, the radiological risk related to school evacuations is very small. We agree that plan revisions are warranted to clarify numerous aspects related to the temporary relocation centers. The problems related to the adequacy of the temporary relocation centers include possible overcrowding, follow-up evacuation to the host county reception centers, length of stay at the temporary relocation center, etc. While these problems must be addressed, they are not a threat to health and safety. We are taking action to revise the plans to resolve all of the concerns; however, we maintain that common sense and responsibility will adequately minimize any problems at the temporary relocation centers in the unlikely event that an incident requiring evacuation were to occur today.

#### Host County Plans

We are confident that host county facilities are fully adequate. We have met with county boards of supervisors, mayors, Civil Defense directors, and individuals responsible for reception centers and congregate care facilities in all five host counties. *They* ~~we~~ have agreed to accept and provide for evacuees. We identified additional congregate care facilities to support the expanded EPZ utilizing facility survey data from the Iowa Disaster Services Division. Shelter profiles will be completed for all congregate care facilities and included in the plans. We expect the shelter profile data will fully support our belief that the host county facilities are adequate. It is our position that the planning inadequacies do not represent a threat to health or safety.

#### Evacuation Time Study

Concerns have been raised regarding the adequacy of the evacuation time study (ETS) for the offsite plans based on the age of the document (February, 1983) and changes to population and road systems which have since occurred. We agree that a new ETS is warranted, but maintain that the existing ETS is conservative based on the fact that the local population has not significantly changed since 1983 and the net effect of the road system changes has been to improve the ability to evacuate the EPZ. Therefore, the ETS related inadequacies which have been cited do not endanger the health or safety of the public.

[REDACTED]

FEMA's concerns are valid and we understand their need for the type of detailed plans they are requesting. We, with the cooperation of State and local authorities, will submit the required plan revisions to support FEMA's schedule. In the meantime, we are absolutely convinced the offsite plans in effect today are adequate to protect the health and safety of the public.

Interim Measures

Although we feel strongly that the offsite plans are adequate and are committed to resolving the cited issues, we propose to implement interim measures subject to FEMA concurrence. We believe there are a number of improvements we can implement almost immediately without waiting for plan approval. These interim measures will provide additional protection to the public during the time period in which the plans are being revised and reviewed. We will propose to meet with FEMA early next week to discuss these interim measures.

We have already agreed with FEMA's recommendation that school evacuations will occur at declaration of Site Area Emergency rather than at Alert as we had proposed. Since this provision is already in the plan, this particular issue is resolved. We have also agreed to treat school bus drivers (and the National Guard) as emergency workers and, therefore, will ensure dosimetry and potassium iodide are available for their use as soon as we can possibly procure them. Other interim measures we intend to take are eliminating the Ponderosa Ballroom as a temporary relocation center, making the necessary changes to EBS messages, and immediately procuring more tone-alert radios for school notification.

# **IOWA ELECTRIC - DUANE ARNOLD ENERGY CENTER**

## **EFFORT IN RESPONSE TO FEMA'S OFFSITE PLANNING ISSUES**

### **I. INTRODUCTORY COMMENTS**

**DICK McGAUGHY  
BILL ROTHERT**

### **II. OVERVIEW OF THE ISSUES**

**STEVE SWAILS**

### **III. ACTION PLAN FOR RESOLUTION**

**GRANT HARPER**

### **IV. CLOSING COMMENTS**

**DICK McGAUGHY  
BILL ROTHERT**

## **OVERVIEW OF THE ISSUES**

- **CHRONOLOGY OF EVENTS**
- **GENERAL NATURE OF INADEQUACIES**
- **ADEQUACY OF EXISTING PLANS**
- **INTERIM MEASURES**

## **CHRONOLOGY OF EVENTS**

- **SUBMITTED OFFSITE PLANS FOR 350 REVIEW IN 1983**
- **SUBMITTED MAJOR REVISIONS TO PLANS -- 7/85**
- **FEMA OBSERVED/EVALUATED EXERCISES**
  - 10/29/85
  - 11/18/86
- **FEMA LETTER TO NRC -- 5/22/87**
  - "... there is reasonable assurance that offsite plans and preparedness are adequate to protect the health and safety around the Duane Arnold site."
  - PORTION OF CEDAR RAPIDS OUTSIDE OF 10 MILES WAS EXCLUDED FROM EPZ.
- **COMMITMENT TO EXPAND EPZ -- 4/9/87**

**CHRONOLOGY OF EVENTS**  
**(continued)**

- **DRAFT LINN CO. PLAN SUBMITTAL -- 11/30/87**
  
- **LINN CO. PLAN SUBMITTAL -- 12/31/87**
  
- **FEMA VII MEMOS**  
**1/19/88, 1/27/88, 2/9/88, 2/16/88**
  
- **MEETINGS WITH FEMA VII -- 3/2-3/88**
  
- **FOLLOW-UP MEETINGS WITH FEMA VII**  
**3/8/88, 3/18/88, 4/1/88, 4/8/88**
  
- **FEMA LETTER TO NRC (STELLO) -- 3/30/88**

## **GENERAL NATURE OF INADEQUACIES**

### **SCHOOL EVACUATION**

- **60%/40% SPLIT**
- **TIMING OF SCHOOL EVACUATIONS**
- **DOSIMETRY FOR SCHOOL BUS DRIVERS**
- **ADEQUACY OF TEMPORARY RELOCATION CENTERS**
- **FOLLOW-UP TRANSPORTATION TO HOST CO. FACILITIES**

### **HOST COUNTY PLANS**

- **REFERENCE IN PLANS TO UHL ACTIVITIES**
- **SHELTER PROFILES INCOMPLETE**
- **TRANSIENT POPULATION**
- **WRITTEN AGREEMENTS WITH CONGREGATE CARE FACILITIES**
- **TRANSPORTATION FROM RECEPTION CENTERS TO CONGREGATE CARE FACILITIES**
- **ROLE OF AMERICAN RED CROSS**



**GENERAL NATURE OF INADEQUACIES  
(continued)**

**EVACUATION TIME STUDY**

- **AGE OF EXISTING TIME STUDY (1983)**
- **TRANSIENT POPULATION**
- **ROAD NETWORK CHANGES**
- **INCONSISTENCIES BETWEEN ETS PLANS AND  
PUBLIC INFORMATION MATERIAL**

## **ADEQUACY OF EXISTING PLANS**

**EXISTING OFFSITE PLANS ARE ADEQUATE TO PROTECT THE HEALTH AND SAFETY OF THE PUBLIC.**

- **FEMA HAS OBSERVED AND EVALUATED '85 AND '86 EXERCISES**
  - **OFFSITE PLANS AND PREPAREDNESS DEEMED ADEQUATE**
- **REVIEWED AND APPROVED BY LOCAL, COUNTY AND STATE OFFICIALS**
- **OFFSITE PLANS ARE EXERCISED APPROX. 4 TIMES PER YEAR**
- **STATE AND LOCAL AUTHORITIES UNDERSTAND PLANS AND HAVE CONFIDENCE IN THEM.**
- **CITED INADEQUACIES REPRESENT A SMALL PORTION OF THE OVERALL EMERGENCY PLANNING EFFORT.**
- **WILL RESOLVE FEMA'S CONCERNS EXPEDITIOUSLY**

## **INTERIM MEASURES**

### **PLAN TO IMPLEMENT INTERIM MEASURES**

- **THINGS WE CAN DO IMMEDIATELY (WITH FEMA CONCURRENCE) WITHOUT WAITING FOR PLAN APPROVAL**
- **WILL CONTACT FEMA TO DISCUSS**

### **INTERIM MEASURES**

- **EVACUATE SCHOOLS AT SITE EMERGENCY**
- **ELIMINATE PONDEROSA BALLROOM AS A TRC**
- **MAKE CHANGES TO EBS MESSAGES**
- **MAKE DOSIMETRY & KI AVAILABLE FOR BUS DRIVERS & NATIONAL GUARD**
- **TONE ALERT RADIOS**

### **SCHEDULE**

## **ACTION PLAN FOR RESPONSE**

- **RESPONSE ACTIVITY**
- **MILESTONE SCHEDULE**
- **RESPONSE TASK LISTING**
- **APRIL 8, 1988 DRAFT SCHOOL PLAN  
SUBMITTAL**

## **RESPONSE ACTIVITY**

### **SCHOOL EVACUATION PLANS**

#### **■ KEY TASKS**

- done* . **VERIFICATION OF SCHOOL POPULATIONS**
- . **ASSESSMENT OF TEMPORARY RELOCATION CENTERS**
- . **ASSESSMENT OF NOTIFICATION PATHS**
- . **DEVELOPMENT OF STANDARD OPERATING PROCEDURES FOR SCHOOLS AND TEMPORARY RELOCATION CENTERS**
- . **BUS DRIVER TRAINING**

### **HOST COUNTY PLANS**

#### **■ KEY TASKS**

- . **FACILITY VERIFICATION**
- . **REVIEW/ASSESS SUPPORT AGENCY ROLES**
- . **REVIEW/ASSESS LETTERS OF AGREEMENT**

- **DEVELOPMENT OF STANDARD OPERATING PROCEDURES FOR EACH RECEPTION CENTER AND CONGREGATE CARE FACILITY**
- **REVIEW TRANSPORT RESOURCES WITHIN EACH HOST COUNTY**

### **EVACUATION TIME STUDY**

#### **■ KEY TASK AREAS**

- **POPULATION VERIFICATION**
- **ASSESS IMPACT OF SPECIAL TRANSPORT PATTERNS**
- **RESEARCH EXISTING TRAFFIC ENGINEERING DATA**
- **TECHNICAL ANALYSIS OF EVACUATION ROUTES**

## MILESTONE SCHEDULE

### SCHOOL PLAN

- SUBMITTED -- 4/8
- LOCAL GOV'T COMMENTS -- 4/15
- SCHOOL COMMENTS -- 4/15
- FEMA COMMENTS -- 4/19
- RESUBMIT TO FEMA -- 5/6

### HOST COUNTY PLAN

- FACILITIES
  - Begin Host County Survey -- 4/13  
(PREPARE PROFILES FROM FEMA DATABASE)
  - VERIFICATION OF FACILITIES BEGINS -- 4/24
  - SUBMIT TO FEMA -- 5/6
  - FINAL VERIFICATION COMPLETED -- 5/31
  - FINAL PROFILES PREPARED AND SIGNED -- 6/20

## RESOURCE VERIFICATION

- IDENTIFIED -- 4/8
- VERIFIED -- 4/18
- CONTACTS IDENTIFIED -- 4/18
- LOA'S INITIATED -- 5/2

## SUPPORT AGENCIES

- IDENTIFIED -- 4/8
- CONTACTS IDENTIFIED -- 4/18
- LOA'S INITIATED -- 5/2

## SOP DEVELOPMENT

- IDENTIFIED -- 4/25
- INITIATED -- 5/2
- COMPLETED -- 7/11

## POPULATION STUDIES

- PLAN REVIEW INITIATED -- 4/11
- PLAN POPULATION CHANGES COMPLETE  
-- 4/25



## EVACUATION TIME STUDY

- ROAD NETWORK SURVEY FINISHED -- 4/23
- ROAD NETWORK COMPUTER MODEL COMPLETE -- 4/29
- EVACUATION MODELING COMPLETE -- 5/9
- PRELIMINARY SUMMARY OF CRITICAL INFO -- 5/16
- SUBMIT FOR FEMA REVIEW -- 7/18
- FINAL -- 8/12

## TRANSPORTATION PLAN

- BEGIN DATE ACQUISITION -- 4/18
- IDENTIFY BUS ROUTES -- 4/18
- PRELIMINARY REVIEW -- 4/22
- DRAFT FOR FEMA REVIEW -- 5/2

## TRAINING

- IDENTIFIED -- 5/23
- INITIATE DEVELOPMENT -- 5/23
- STARTED -- 7/1
- COMPLETED -- 8/8

## **RESPONSE TASK LISTING**

- **COMPOSITE LISTING OF CONCERNS**
- **MANY TASKS INTERRELATED**
- **BENCHMARK FOR PROGRESS**
- **ADDITIONAL TASKS ADDED AS WORK PROGRESSES**

**APRIL 8, 1988 SUBMITTAL OF  
DRAFT SCHOOL PLAN DOCUMENTS**

- **DRAFT APPENDIX 1 - SCHOOL EVACUATION AND RELOCATION PLANS**
- **RESPONSE GUIDE FOR SCHOOL PLAN SUBMISSION**
- **SUPPORTING EXHIBITS DETAILING CRITICAL PLAN COMPONENTS**
  - **NOTIFICATION SOP**
  - **JUSTIFICATION FOR STAY TIMES AT TEMPORARY RELOCATION CENTERS**
  - **ELIMINATION OF COLLEGE STUDENTS FROM SCHOOL PLANS**
  - **CAPACITY AND LOADING STUDY FOR TEMPORARY RELOCATION CENTERS**
  - **TEMPORARY RELOCATION CENTER FACILITY PROFILES**