

May 28, 1982

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Docket No. 50-331

Iowa Electric Light and Power
Company

ATTN: Mr. Duane Arnold
President

IE Towers

P. O. Box 351

Cedar Rapids, IA 52406

Gentlemen:

This is in response to your May 13, 1982, letter to Mr. James G. Keppler, Regional Administrator, regarding the July 28, 1982, Duane Arnold Exercise. We have reviewed the exercise objectives and find them adequate except for the issue of testing the prompt public notification system.

Your letter states that "the administrative and physical means to alert the public within the plume exposure pathway EPZ will be demonstrated, short of actual siren activation." We find this unacceptable for the following reasons:

1. 10 CFR 50, Appendix E, Section F (Training) states, in part, that an exercise shall test the public notification system. The NRC staff has consistently interpreted this requirement as a physical test of all applicable notification equipment and a demonstration that State/local officials have the capability to make a public notification decision promptly upon being informed by the licensee of an emergency.
2. FEMA currently intends to evaluate the effectiveness of the prompt public notification pursuant to NUREG-0654, Appendix 3, page 3-3. This will require FEMA, in conjunction with an exercise of the facility and cooperation with the licensee and State/local government, to take a statistical sample of the residents of all areas within the 10 mile EPZ to assess the public's ability to hear the alerting signal and their awareness of its meaning.
3. FEMA and NRC will have evaluators at the July 29, 1982, exercise and will be prepared to observe the performance of the prompt public notification system at that time. To have a separate "mini-exercise" on August 4, 1982, causes schedule conflicts with both agencies.

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Accordingly, we expect a test of the prompt public notification system in conjunction with the July 28, 1982, exercise in order for the Duane Arnold Energy Center to be in compliance with 10 CFR 50, Appendix E. We have coordinated our findings as stated in this letter with FEMA, Region VII and we find no basis to allow for an exemption from this part of the regulation.

Sincerely,

for *CJ Papariello*
J. A. Hind, Director
Division of Emergency Preparedness
and Operational Support

cc: D. Mineck, Chief Engineer

cc w/ltr dtd 5/13/82:

Steve Ferris, FEMA

Region V

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