



Federal Emergency Management Agency

Washington, D.C. 20472

JUL 6 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 provide you with a status of offsite radiological emergency planning efforts that have been undertaken by the State of Iowa, the local jurisdictions, and the Iowa Electric Light and Power (IELP) Company for the Duane Arnold Energy Center. These planning efforts were intended to address planning inadequacies identified in the Federal Emergency Management Agency's (FEMA) March 30, 1988, 44 CFR 350.12 negative finding to the Nuclear Regulatory Commission (NRC). The March 30, 1988, finding outlined a schedule requiring submission of adequate offsite plans and procedures and approval of those plans and procedures by July 1, 1988.

As indicated in the attached July 1, 1988, memorandum from Mr. J. D. Overstreet, Regional Director, the Iowa Disaster Services Division has failed to submit to FEMA Region VII the appropriate plans and procedures necessary to correct all of the planning inadequacies identified in the March 30, 1988, finding. The FEMA Region VII memorandum outlines nine inadequacies remaining uncorrected from those identified in the March 30, 1988, finding and two additional inadequacies that have been identified in the revised plans submitted by Iowa on June 22, 1988. The Evacuation Time Study (inadequacy No. 9 in the attached memorandum), however, is not due until August 12, 1988.

In consideration of the offsite planning inadequacies that remain uncorrected, as outlined in the attached July 1, 1988, memorandum, we are still unable to conclude that there is reasonable assurance that the offsite planning site-specific to the Duane Arnold Energy Center is adequate to protect the health and safety of the public and must reaffirm the negative finding issued on March 30, 1988. As a result of the outstanding plan inadequacies FEMA does not plan to evaluate the Duane Arnold biennial exercise currently scheduled for September 21, 1988. It is important that our staffs discuss this finding and a course of action as soon as possible. If you have any questions, please contact Mr. Richard W. Krimm at 646-2871.

Sincerely,


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

8808230204 880818
PDR ADDOCK 05000331
F PNU

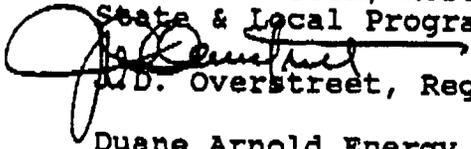


Federal Emergency Management Agency

Region VII
911 Walnut Street, Room 200
Kansas City, MO 64106

JUL 1 1988

MEMORANDUM FOR: Grant Peterson, Associate Director
State & Local Programs & Support Directorate

FROM: 
J.D. Overstreet, Regional Director

SUBJECT: Duane Arnold Energy Center Negative Finding

The purpose of this memorandum is to reaffirm the negative finding issued by your office on March 30, 1988 for the Duane Arnold Energy Center. This action is necessary because the Iowa Disaster Services Division failed to submit the appropriate plans and procedures to correct all of the planning inadequacies identified in the negative finding by the July 1, 1988 due date. As you know, July 1, 1988 was the deadline for full and adequate plan submission and approval as requested by this office and cited in your negative finding. These unresolved planning inadequacies are significant as they formed the basis for the negative finding. Of the thirty-three (33) inadequacies originally identified as the basis for the negative finding, twenty-four (24) have been adequately corrected. Nine (9) remain unresolved and are as follows:

1. Insufficient resources exist to provide monitoring, decontamination, and congregate care of evacuees living in the plume emergency planning zone. Specifically, Dubuque County was recently eliminated as a host county which was to accommodate over 9,500 evacuees. This elimination resulted due to restrictions imposed by the host county officials that contaminated vehicles not be allowed into their county. An effort by the State to resolve this concern, by providing resources to monitor vehicles before they entered the county, was unsuccessful. It is understood that negotiations are currently underway with another county to provide the appropriate resources for monitoring, decontamination and congregate care to fill the void left by the loss of Dubuque County. However, as of this date, plans and procedures for an alternate host county have not been provided.
2. The Linn County Plan fails to document the appropriate dosimetry to be provided to school bus drivers. Permanent record dosimetry is not accounted for.
3. Some of the transportation resources for the evacuation of school children from the metropolitan Cedar Rapids area are

questionable. Per the Linn County Plan, the public school system in West Dubuque, Dubuque County, was to provide buses for transportation of school children out of the Cedar Rapids metropolitan area. However, Dubuque County has been eliminated as a host county. Therefore, the State must reassure that these resources are still available to evacuate the schools in Linn County, or provide for alternative transportation sources.

4. Shelter profiles which document the number of spaces, showers, contact persons, etc., are incomplete as Dubuque County has been eliminated as a host county.
5. Inconsistencies exist within the Linn County Plan concerning the type of dosimetry to be provided to emergency workers. In addition, in some cases permanent record dosimetry is not provided for in the plans.
6. Floor plans for the reception, monitoring, and decontamination functions are incomplete as Dubuque County has been eliminated as a host county. Plans and procedures for an alternate host county have not been submitted.

In addition, the floor plans of the facilities to be utilized for monitoring and decontamination as shown in the Johnson County host plan are incomplete and in some cases incorrect. None of the seven facilities indicate where registration of evacuees will occur. Two of the seven fail to indicate where evacuees enter the facility and where monitoring actually occurs.

7. The host county plans fail to document that personnel and equipment exist to monitor, within a 12-hour period, a minimum of twenty percent (20%) of the estimated population to be evacuated pursuant to FEMA policy. The host county plans document the number of monitors required for this function; however, they fail to specifically identify from where these resources will be provided. Therefore, I cannot attest, without equivocation, that the actual resources for monitoring are readily available, especially in Johnson County where the plan states that 115 monitors will be utilized.
8. The means for decontamination of emergency workers, supplies, instruments, and equipment are incomplete as Dubuque County has been eliminated as a host county. These procedures have not been provided as an alternate host county has not been identified.
9. The Evacuation Time Study (ETS) remains to be corrected to reflect the evacuation routes as shown in the Linn and Benton County Plans. However, submission of the revised ETS is not due until August 12, 1988.

Related to the negative finding issues noted above, the following additional concerns have been identified with the June 22, 1988 plan

submission. These are due to changes from the original plan submission:

1. The ability to decontaminate evacuees at the Buchanan County host facility is questionable. The plan calls for the use of eight mobile showers instead of fixed showers per the original plan submission. Concerns exist regarding the use of this equipment such as: how and where these showers will be setup; how the contaminated waste water is accounted for; and who maintains the equipment.
2. As Dubuque County was eliminated as a host county, the following concerns have been identified and must be addressed by the State:
 - * The Evacuation Time Study (ETS) must be amended to reflect the changes in evacuation routes, and any other issues relative to the change in host counties. Submission of the revised ETS is not due until August 12, 1988.
 - * The Linn and Benton County Plans must be amended to reflect the elimination of Dubuque County.
 - * The public information brochures must be amended to reflect the change in evacuation routes and relocation centers.

As you know, the biennial exercise for the Duane Arnold Energy Center is scheduled for September 21, 1988. However, as stated in my original correspondence which led to your Negative Finding, Region VII cannot and will not participate in the September 21, 1988 exercise. I find we are unable to properly evaluate any such exercise scheduled for the above date because of the State's failure to provide approvable plans in sufficient time to meet the requirement for submission of exercise objectives 75 days in advance of a scheduled exercise.

DISTRIBUTION:

VStello, EDO
JMTaylor, EDO
TRehm, EDO
ABDavis, RIII
JPMurray, OGC
TEMurley, NRR
JHSniezek, NRR
TMMartin, NRR
FJMiraglia, NRR
FPGillespie, NRR
COThomas, NRR
JLBlaha, NRR
JRHall, NRR
CENorelius, RIII
WDShafer, RIII
FJCongel, NRR
WDTravers, NRR
RJBarrett, NRR
LJCunningham, NRR
CRVan Niel, NRR
FKantor, NRR
RAMEck, NRR
DFMossburg, EDO-3818
MCBridgers, EDO-3818
MECoons, 88-71
Central Files
PDR
EDO R/F
PEPB R/F

DF03
||



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

AUG 18 1988

Mr. Grant C. Peterson
Associate Director
State and Local Programs and Support
Federal Emergency Management Agency
Washington, D.C. 20472

Dear Mr. Peterson:

This letter responds to your letter of July 6, 1988, concerning the status of offsite emergency preparedness for the Duane Arnold Energy Center (DAEC). Specifically your letter noted that several previously identified planning inadequacies for Duane Arnold have not been resolved and that, as a result, FEMA's negative finding of March 30, 1988, was reaffirmed and FEMA is unable to support evaluation of the DAEC exercise scheduled for September 21, 1988.

As a response to the information provided both in your letter and informally by your staff, NRC has taken several steps to effect the licensee's timely resolution of this issue. On July 5, 1988, A. Bert Davis, NRC Regional Administrator for Region III, Glen Ellyn, Illinois, issued a Confirmatory Action Letter to Iowa Electric Light and Power Company (IELP), the licensee, which documented IELP's agreement to submit proposed resolutions to the identified FEMA deficiencies by August 12, 1988 (Enclosure 1). On July 14, 1988, Mr. Davis, members of his staff, and representatives from NRC headquarters met with Mr. J. Overstreet, Director of FEMA Region VII, to discuss the Duane Arnold issues. At this meeting, FEMA informed NRC that, because of schedular constraints, only November 15, 1988, remained open for rescheduling of the DAEC exercise and that rescheduling was contingent on the submittal of an adequate offsite emergency plan no later than August 1, 1988.

Following this meeting, Mr. Davis contacted senior licensee management personnel to emphasize the importance of a timely and high-quality submittal. This discussion was formalized in a letter from Mr. Davis to the licensee (Enclosure 2). Subsequently the State of Iowa provided a revised plan to FEMA Region VII prior to August 1, 1988. We understand from discussions between our staffs that the revised plan addresses the concerns identified by FEMA in your July 6, 1988 letter. As indicated by Mr. Overstreet in the July 14, 1988 meeting with Mr. Davis, FEMA Region VII expects to determine the adequacy of the submittal by August 26, 1988.

~~2878234189~~

3
4 pp.

Mr. Grant C. Peterson

-2-

In summary, NRC shares your interest in the expeditious resolution of this issue, and our staffs have been actively coordinating their efforts to ensure that end. We appreciate FEMA's efforts and will continue to work closely with your staff. If you have any questions, please call Dr. Frank J. Congel at 492-1088.

Sincerely,

Original signed by
Victor Stello

Victor Stello, Jr.
Executive Director
for Operations

Enclosures:

- 1. Ltr. dtd. 7/5/88
- 2. Ltr. dtd. 7/19/88

DISTRIBUTION:
See Attached

** Concurrence by telephone
* See previous concurrence

*PEPB:DREP RAMEck:lr 07/22/88 	TECH ED BCalure 07/26/88	*SC:PEPB:DREP CRVanNiel 07/22/88	**REG III CENorelius 07/21/88	*C:PEPB:DREP WDTravers 07/22/88	*D:DREP FJCongel 07/22/88
08/16/88	*D:PDIII-3:DRSP KEPerkins 07/22/88	*ADT:NRR TTMartin 07/28/88	*D:NRR TEMurley 07/29/88	EDO VStello 08/ /88	

Mr. Grant C. Peterson
Associate Director
State and Local Programs and Support
Federal Emergency Management Agency
Washington, D.C. 20472

Dear Mr. Peterson:

This is provided in response to your July 6, 1988 letter concerning the status of offsite emergency preparedness for the Duane Arnold Energy Center (DAEC). Specifically your letter noted that several previously identified planning inadequacies for Duane Arnold have not been resolved and that, as a result, FEMA's March 30, 1988 negative finding was reaffirmed and FEMA is unable to support evaluation of the DAEC exercise scheduled for September 21, 1988.

As a response to the information provided in both your letter and informally by your staff, the NRC has taken several steps to ensure timely resolution of this issue. On July 5, 1988 NRC Regional Administrator (Region III, Glen Elyn, Illinois), A. Bert Davis, issued a Confirmatory Action Letter to the licensee, Iowa Electric Light and Power Company (IELP), which documented IELP's agreement to submit proposed resolutions to the identified FEMA deficiencies by August 12, 1988 (Enclosure 1). On July 14, 1988 Mr. Davis, members of his staff and representatives from NRC headquarters met with Mr. J. Overstreet, Director of FEMA Region VII, to discuss the Duane Arnold issues. At this meeting FEMA informed the NRC that, due to scheduler constraints, only November 15, 1988 remains open for rescheduling of the DAEC exercise, and that rescheduling is contingent on the submittal of an adequate offsite emergency plan no later than August 1, 1988. Mr. Overstreet indicated that FEMA will make its determination of the adequacy of the submittal by August 26, 1988.

Following this meeting Mr. Davis contacted senior licensee management to emphasize the importance of a timely and high quality submittal. This discussion was formalized in a letter from Mr. Davis to the licensee (Enclosure 2).

In summary the NRC shares your interest in expeditious resolution of this issue. I expect that NRC and FEMA staff will continue to work closely to assure that end. If you have any questions, please call Dr. Frank J. Congel at 492-1088.

Sincerely,

Victor Stello, Jr.
Executive Director
for Operations

DISTRIBUTION:
See Attached

* Concurrence by telephone

PEPB:DREP RAMEck:lr 07/22/88	TECH ED 07/ /88	SC:PEPB:DREP CRNiel 07/22/88	*REG III CENorelius 07/21/88	C:PEPB:DREP WITbavens 07/22/88	D:DREP FJCongel 07/25/88	D:PDIII-3.DRSP KEPerkins 07/22/88
ADT:NRR TTMartin 07/ /88	D:NRR TEMurley 07/ /88	EDO VStello 07/ /88				

Mr. Grant C. Peterson
Associate Director
State and Local Programs and Support
Federal Emergency Management Agency
Washington, D.C. 20472

Dear Mr. Peterson:

This letter responds to your letter of July 6, 1988, concerning the status of offsite emergency preparedness for the Duane Arnold Energy Center (DAEC). Specifically your letter noted that several previously identified planning inadequacies for Duane Arnold have not been resolved and that, as a result, FEMA's negative finding of March 30, 1988, was reaffirmed and FEMA is unable to support evaluation of the DAEC exercise scheduled for September 21, 1988.

As a response to the information provided both in your letter and informally by your staff, NRC has taken several steps to ensure timely resolution of this issue. On July 5, 1988, A. Bert Davis, NRC Regional Administrator for Region III, Glen Ellyn, Illinois, issued a Confirmatory Action Letter to Iowa Electric Light and Power Company (IELP), the licensee, which documented IELP's agreement to submit proposed resolutions to the identified FEMA deficiencies by August 12, 1988 (Enclosure 1). On July 14, 1988, Mr. Davis, members of his staff, and representatives from NRC headquarters met with Mr. J. Overstreet, Director of FEMA Region VII, to discuss the Duane Arnold issues. At this meeting, FEMA informed NRC that, because of schedular constraints, only November 15, 1988, remains open for rescheduling of the DAEC exercise and that rescheduling is contingent on the submittal of an adequate offsite emergency plan no later than August 1, 1988. Mr. Overstreet indicated that FEMA will determine the adequacy of the submittal by August 26, 1988.

Following this meeting, Mr. Davis contacted senior licensee management personnel to emphasize the importance of a timely and high-quality submittal. This discussion was formalized in a letter from Mr. Davis to the licensee (Enclosure 2).

In summary, NRC shares your interest in the expeditious resolution of this issue, and I expect that the NRC and the FEMA staff will continue to work closely to ensure that end. If you have any questions, please call Dr. Frank J. Congel at 492-1088.

Sincerely,

Victor Stello, Jr.
Executive Director
for Operations

Enclosures:
1. Ltr. dtd. 7/5/88
2. Ltr. dtd. 7/19/88

DISTRIBUTION:
See Attached

** Concurrence by telephone
* See previous concurrence

*PEPB:DREP	TECH ED	*SC:PEPB:DREP	**REG III	*C:PEPB:DREP	*D:DREP
RAMEck:lr	BCalure	CRVanNiel	CENorelius	WDTravers	FJCongel
07/22/88	07/26/88	07/22/88	07/21/88	07/22/88	07/22/88

*D:PDIII-3:DRSP	ADT:NRR	D:VPP	EDO
KEPerkins	TTMartin	TEWukley	VStello
07/22/88	07/24/88	07/29/88	07/ /88

Davis
7/29

JUL 05 1988

Docket No. 50-331

Iowa Electric Light and Power
CompanyATTN: Mr. Lee Liu
President and Chief
Executive OfficerIE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

This confirms the telephone conversation between Mr. W. D. Shafer of this office and Mr. W. Rothert of your staff on July 5, 1988, relating to the Federal Emergency Management Agency (FEMA) identified inadequacies in the State and County emergency plans for the Duane Arnold Energy Center. With regard to this matter, we understand that you will develop and submit to FEMA VII by August 12, 1988, recommended resolutions to the following inadequacies:

1. Insufficient resources exist to provide monitoring, decontamination, and congregate care of evacuees living in the plume emergency planning zone. Specifically, Dubuque County was recently eliminated as a host county which was to accommodate over 9,500 evacuees. This elimination resulted due to restrictions imposed by the host county officials that contaminated vehicles not be allowed into their county. An effort by the State to resolve this concern, by providing resources to monitor vehicles before they entered the county, was unsuccessful. It is understood that negotiations are currently underway with another county to provide the appropriate resources for monitoring, decontamination, and congregate care to fill the void left by the loss of Dubuque County. However, as of this date, plans and procedures for an alternate host county have not been provided.
2. The Linn County Plan fails to document the appropriate dosimetry to be provided to school bus drivers. Permanent record dosimetry is not accounted for.
3. Some of the transportation resources for the evacuation of school children from the metropolitan Cedar Rapids area are questionable. Per the Linn County Plan, the public school system in West Dubuque, Dubuque County, was to provide buses for transportation of school children out of the Cedar Rapids metropolitan area. However, Dubuque County has been eliminated as a host county. Therefore, the State must reassure that these resources are still available to evacuate the schools in Linn County, or provide for alternative transportation sources.

Iowa Electric Light and Power
Company

- 2 -

JUL 05 1988

4. Shelter profiles which document the number of spaces, showers, contact persons, etc., are incomplete as Dubuque County has been eliminated as a host county.
5. Inconsistencies exist within the Linn County Plan concerning the type of dosimetry to be provided to emergency workers. In addition, in some cases permanent record dosimetry is not provided for in the plans.
6. Floor plans for the reception, monitoring and decontamination functions are incomplete as Dubuque County has been eliminated as a host county. Plans and procedures for an alternate host county have not been submitted.

In addition, the floor plans of the facilities to be utilized for monitoring and decontamination as shown in the Johnson County host plan are incomplete and in some cases incorrect. None of the seven facilities indicate where registration of evacuees will occur. Two of the seven fail to indicate where evacuees enter the facility and where monitoring actually occurs.

7. The host county plans fail to document that personnel and equipment exist to monitor, within a 12-hour period, a minimum of twenty percent (20%) of the estimated population to be evacuated pursuant to FEMA policy. The host county plans document the number of monitors required for this function; however, they fail to specifically identify from where these resources will be provided. Therefore, it cannot be stated, without equivocation, that the actual resources for monitoring are readily available, especially in Johnson County where the plan states that 115 monitors will be utilized.
8. The means for decontamination of emergency workers, supplies, instruments and equipment are incomplete as Dubuque County has been eliminated as a host county. The procedures have not been provided as an alternate host county has not been identified.
9. The Evacuation Time Study (ETS) remains to be corrected to reflect the evacuation routes as shown in the Linn and Benton County Plans. The submission of the revised ETS is due August 12, 1988.
10. The ability to decontaminate evacuees at the Buchanan County host facility is questionable. The plan calls for the use of eight mobile showers instead of fixed showers per the original plan submission. Concerns exist regarding the use of this equipment such as: how and where those showers will be setup; how the contaminated waste water is accounted for; and who maintains the equipment.
11. As Dubuque County was eliminated as a host county, the following concerns have been identified and must be addressed by the State:

Iowa Electric Light and Power
Company

- 3 -

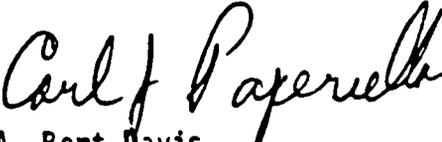
JUL 05 1988

- The Evacuation Time Study (ETS) must be amended to reflect the changes in evacuation routes, and any other issues relative to the change in host counties. Submission of the revised ETS is due August 12, 1988.
- The Linn and Benton County Plans must be amended to reflect the elimination of Dubuque County.
- The public information brochures must be amended to reflect the change in evacuation routes and relocation centers.

It is our understanding that you will provide a formal report of the overall results of your corrective actions to the Office of Nuclear Reactor Regulation and Region III upon completion.

Issuance of this Confirmatory Action Letter does not preclude the issuance of an Order requiring implementation of the above commitments. If your understanding differs from that set forth above, please call me immediately.

Sincerely,


A. Bert Davis
Regional Administrator

cc: R. Hannen, Plant
Superintendent - Nuclear
R. Salmon, Technical Services
Superintendent
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
John A. Eure, Iowa Department
of Public Health
J. M. Taylor, EDO
J. D. Overstreet, FEMA VII
J. Lieberman, OE
L. Chandler, OGC
F. Congel, NRR
W. Travers, NRR



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

JUL 19 1988

Docket No. 50-331

Iowa Electric Light and Power
Company
ATTN: Mr. Richard McGaughy
Vice President-Production
IE Towers
P. O. Box 351
Cedar Rapids, IA 52406

Gentlemen:

This is to confirm our telephone conversation of July 14, 1988, regarding the status of Iowa Electric Light and Power Company's offsite emergency planning. On July 14, 1988, I met with the Director, FEMA Region VII, and his staff regarding the July 6, 1988, reaffirmation of FEMA's negative finding on the adequacy of off-site plans for the Duane Arnold Energy Center. The purpose of this meeting was to discuss options for resolving deficiencies identified by FEMA in their review of State and County emergency plans.

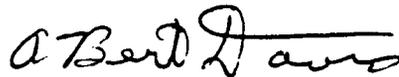
It is of concern to me that Iowa Electric has not been effective in resolving issues raised by FEMA in a timely manner. My Confirmatory Action Letter dated July 5, 1988 identified the remaining issues that need to be resolved and documented your agreement to provide the needed information to FEMA by August 12, 1988. However, based on our meeting with FEMA, it appears essential that the information be submitted to them by August 1, 1988, and based on our telephone discussion, we understand you can meet that schedule. Further, it is imperative that the submittal be of high quality with a minimal number of items remaining to be resolved.

Assuming the timely submittal, i.e., August 1, 1988, of complete information on which FEMA can make a positive determination of the adequacy of such plans by August 26, 1988, FEMA has agreed to support a full participation drill on November 15, 1988. However, the failure to obtain timely FEMA approval and conduct the November drill will result in a NRC determination of the significance of the emergency planning deficiencies as they relate to continued plant operation.

~~88-728-245~~
2PP

We are disappointed that due to the untimely and inadequate submittal of information to FEMA, the scheduled September 21, 1988 emergency exercise had to be delayed. We urge your timely and complete response to the identified concerns to assure an appropriate resolution of this matter.

Sincerely,



A. Bert Davis
Regional Administrator

cc: L. Liu, President and Chief
Executive Officer
R. Hannen, Plant
Superintendent - Nuclear
R. Salmon, Technical Services
Superintendent
DCD/DCB (RIDS)
Licensing Fee Management Branch
Resident Inspector, RIII
John A. Eure, Iowa Department
of Public Health
E. Gordon, Administrator, Iowa
Disaster Service Division
F. J. Congel, NRR
W. B. Travers, NRR
C. R. VanNiel, NRR
R. A. Meck, NRR
J. R. Hall, NRR
J. Overstreet, FEMA VII