



# Federal Emergency Management Agency

Washington, D.C. 20472

JUL 2 1991

Mr. James M. Taylor  
Executive Director for Operations  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Mr. Taylor:

In accordance with the Federal Emergency Management Agency (FEMA) Rule, Title 44 CFR, Part 350, the State of Iowa originally submitted the Iowa Radiological Emergency Response Plan site-specific to the Duane Arnold Energy Center, to the Regional Director of FEMA Region VII for review and approval on June 20, 1983. During the subsequent review of the site-specific offsite radiological emergency response plans and preparedness, FEMA Region VII and the FEMA Region VII Regional Assistance Committee (RAC) identified several planning issues which required correction before a recommendation of formal approval could be made in accordance with Title 44 CFR, Part 350. Specifically, the review revealed that some areas of the Cities of Cedar Rapids and Marion, Iowa, beyond the identified 10-mile plume emergency planning zone (EPZ) had not been included in the overall offsite radiological emergency response planning effort even though written information and documentation had been submitted by the State of Iowa and Iowa Electric Light and Power (IELP) Company indicating that these areas had been included.

Subsequent to the identification of these problems, representatives of the State of Iowa and local governments, IELP, FEMA, and the Nuclear Regulatory Commission (NRC) all agreed that an expansion of planning efforts to include all of Cedar Rapids and Marion, Iowa, was warranted. The Iowa Disaster Services Division was notified on April 9, 1987, that these offsite radiological emergency response planning inadequacies would have to be corrected prior to a recommendation of formal plan approval. All parties agreed that corrected plans would be submitted to FEMA Region VII for review by December 31, 1987.

On January 8, 1988, the State of Iowa formally endorsed the revised plans as being adequate to protect the public health and safety and submitted them to FEMA Region VII for review. A review by FEMA Region VII and the Region VII RAC disclosed several remaining offsite radiological emergency planning inadequacies involving school evacuation procedures, reception/host county plans, the evacuation time study, the Emergency Broadcast System (EBS), the alert and notification system, and planning for the mobility-impaired. The Iowa Disaster Services Division was notified of these remaining inadequacies by correspondence in January, February, and March 1988. Near the end of March 1988, due to the seriousness of the planning inadequacies that had been identified and the amount of time that had elapsed without their satisfactory resolution, FEMA's Associate Director for State and Local Programs and Support issued a negative finding on March 30, 1988, which stated that there was no longer reasonable assurance that the Iowa State and local offsite radiological

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emergency response planning site-specific to the Duane Arnold Energy Center was adequate to protect the health and safety of the public in the event of an emergency at the site.

As a result of the significant revisions implemented by the State of Iowa to the appropriate offsite radiological emergency response plans, which fully addressed and corrected the previously identified inadequacies, and the conduct of a successful full-participation exercise and remedial drill, FEMA rescinded the March 30, 1988, negative finding. FEMA Region VII then proceeded with the formal review of the State and local offsite radiological emergency response plans.

On December 18, 1990, the FEMA Region VII Regional Director forwarded to me his final evaluation of the Iowa State and associated local plans site-specific to the Duane Arnold Energy Center, along with a recommendation for formal approval, in accordance with Section 350.11 of the FEMA Rule. Included in this evaluation was a transcript of the Public Meeting conducted on November 12, 1981, in accordance with Section 350.10 of the FEMA Rule and an evaluation of the Duane Arnold Energy Center offsite radiological emergency response exercise conducted on October 31-November 1, 1990, in accordance with Section 350.9 of the FEMA Rule.

Based on an overall evaluation, I find and determine that the Iowa State and local radiological emergency response plans and preparedness site-specific to the Duane Arnold Energy Center are adequate to protect the health and safety of the public living in the vicinity of the site. The offsite radiological emergency response plans and preparedness are assessed as adequate in that there is reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency and that the plans are capable of being implemented.

The prompt alert and notification system installed and operational around the Duane Arnold Energy Center was previously approved by FEMA on January 16, 1990, in accordance with the criteria of NUREG-0654/FEMA-REP-1, Rev. 1, Appendix 3, and FEMA REP-10, "Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants."

Accordingly, I approve the Iowa State and local offsite radiological emergency response plans and preparedness, site-specific to the Duane Arnold Energy Center. FEMA will continue to review the status of the offsite radiological emergency response plans and preparedness site-specific to the Duane Arnold Energy Center in accordance with Section 350.13 of the FEMA Rule.

Sincerely,



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