

UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION II
101 MARIETTA ST., N.W., SUITE 3100
ATLANTA, GEORGIA 30303

Central File

APR 23 1981



Carolina Power and Light Company
ATTN: J. A. Jones
Senior Executive Vice President and
Chief Operating Officer
411 Fayetteville Street
Raleigh, NC 27602

Gentlemen:

Due to an administrative error, the enclosed material, which was an attachment to Report No. 50-261/81-6, was inadvertently deleted. Please attach this to the report.

Sincerely,

R. C. Lewis
R. C. Lewis, Acting Director
Division of Resident and
Reactor Project Inspection

Enclosure: As Stated

cc w/encl:
R. B. Starkey, Jr., Plant Manager
T. A. Kevern, IE:HQ
J. D. Richardson, FEMA - RIV

8106030 015

Q

March 26, 1981

Brigadier General George R. Wise
Director
Emergency Preparedness Division
1429 Senate Street
Columbia, South Carolina 29201

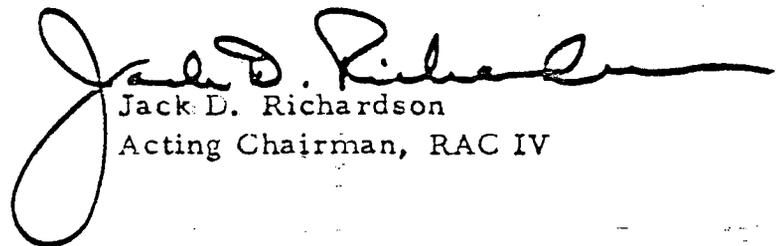
Dear General Wise:

I have enclosed a report of deficiencies noted in the H. B. Robinson REP exercise conducted on March 11-12, 1981. These were identified through observations by the Federal Evaluation Team (Regional Assistance Committee and FEMA IV staff).

While I am aware your planning staff is in process of correcting your plans as a result of (1) formal RAC comment on site specific plans and (2) state/local exercise critique, there are some critical items which need special attention and resolution prior to submitting the plan to FEMA National for its review and acceptance. Thus, at your earliest convenience, please provide Mr. Harris Pope (Acting Regional Director, FEMA IV) with your state's position on how, and within what time frame, these noted deficiencies will be satisfied. Upon receipt of this report, we will proceed with the plans evaluation and acceptance process.

Your state has done much in a short period of time to accomplish what you have on the REP plans. I compliment you for the excellent effort and assure you that RAC IV members and FEMA IV staff look forward to supporting future REP activities in your state.

Sincerely,



Jack D. Richardson
Acting Chairman, RAC IV

Enclosure

cc: PP-S. Brown
RD PP-R. Boyett
CF All RAC IV Members ✓
PP-Yellow Hal Gaut/FEMA REP Division/Washington, DC
Acting Executive Assistant

PP/JDRichardson/fw/x347/3-26-81

DEFICIENCIES NOTED

IN THE

H. B. ROBINSON REP

EXERCISE

CONDUCTED AT HARTSVILLE, SOUTH CAROLINA

MARCH 11 - 12, 1981

DEFICIENCIES IN THE H. B. ROBINSON EXERCISE

1. Notification and Alerting of Officials and Staff

Chesterfield, Darlington and Lee County Plans provide for the State Emergency Preparedness Division to notify the County EOC by telephone with redundant SLED Teletype Communications. This procedure is to be followed when the FEOC has not been established. In Darlington County, the Civil Defense Director was notified by State EPD. However, no redundant message was sent to the Law Enforcement Communications Center. This resulted in the Sheriff not being notified promptly. In this exercise the County EOC was occupied at time of notification. If the accident should happen during non-duty hours, there are no provisions for notification to be sent to the 24 hour Warning Point.

2. Notification and Alerting of the Public

A statement from the Governor's Office was approved for release at 8:45 a.m. This release was monitored on a local radio station EBS Broadcast at 9:40 a.m. The exercise demonstrated a need for the public to be promptly notified and be kept continuously apprised of the developing situation. Current system does not meet NUREG 0654/FEMA REP-1 requirements. However, existing system was exercised within current capability.

3. External Communications Capability Between Sites

The exercise demonstrated a need for improvement in mobile communications between field teams and the Forward Emergency Operations Center. DHEC needs to improve mobile radio efficiency and develop SOP's in event of communications failures. The colocation of the radio and telephones in Chesterfield County EOC led to confusion in message handling.

The exercise showed the FEOC will need more land line communications than those which are currently installed.

The exercise demonstrated a need for additional radio communications at the SEOC as well as additional training for current personnel. Staff limitations and need for additional training were evident.

While physical communications between the FEOC and EOF were generally effective periodic telephone congestion caused some delay in the exchange of information. The need for revision of communication procedures/SOP's between the FEOC and the EOF was evident.

4. Emergency Operations Center (EOC) Facility (Space, Comfort, etc.)

FEOC is basically a good facility, but needs better facility management and utilization of available space.

The Control Center within the FEOC is too small to accommodate all of the agencies represented. Additional phones are needed for use by responsible agencies in the Control Center.

There is not an adequate EOC in Chesterfield County. Thus emergency conditions can not be handled effectively.

5. EOC Internal Communications and Displays (Message Handling, Maps, etc.)

The exercise showed that there is a need for a public address system in the EOC. In addition more frequent periodic briefings were needed. No briefings for field monitoring teams were held and field teams were not fully aware of the total situation.

In Chesterfield County displays consisted of paper or cardboard taped to walls and there were no permanent displays.

Messengers in the SEOC should have orientation training in message handling prior to an exercise. During the exercise briefing all departments/agencies were not made aware that displays, maps, etc. were available in the Operations Room.

6. Adequacy of Staffing (Multiple Shifts, Competency, etc.)

The need for additional DHEC personnel became evident as the exercise progressed. Support from DOE and the SMRAP States was simulated for exercise purposes. More planning in anticipation of a large scale Federal response is required.

Planning for shift operations in Chesterfield was lacking.

Appropriate clerical support for the State EPI Media Center Staff was not provided.

7. Facility Access/Security

In Chesterfield County, the space utilized in the EOC is the day-to-day offices of the Sheriff. Access to this space by his staff and the public was necessary and thus contributed to confusion in the EOC.

8. Support by Responsible Elected and Appointed Officials

No deficiencies noted.

9. Direction and Control (Timely Decision Making, Management, etc.)

Conferences were conducted very informally and on a "one-to one" basis. At times the heads of two or three agencies would discuss matters and make decisions without input from all concerned. By arriving at decisions in this manner, all concerned could not share in the decision-making process.

The entire two mile radius sector was not evacuated prior to evaluating other sectors at greater distances. Provisions for recording activities for future use were not evident during the exercise.

10. Coordination (Between Officials, Agencies, Federal Agencies, etc.)

Internal and external communications problems impacted on effective coordination. Coordination between Bureau of Radiological Health and Highway Patrol in the field was not evident during the exercise.

The exercise demonstrated a need for periodic SITREPS from the Forward Emergency Operations Center to the Technical Support Center. There was limited feedback on utility requests/recommendations.

FEOC procedures did not provide for a briefing schedule in order that key staff members were kept informed. The size and physical location of agencies require a paging system to keep all staff informed on current situation. The FEOC Direction and Control Staff did not keep local government officials adequately informed of the developing emergency situation.

State field monitoring data was not made available to the facility after the first 2-3 hours of exercise play.

During the first 2-3 hours of exercise play State field monitoring data that was provided to the utility conflicted with accident conditions.

11. Emergency Plans (Adherence, SOP's, and Checklists Consulted)

With the exception of DHEC participants were not observed making reference to plans.

Some of the Chesterfield County Emergency Service personnel were not familiar with the plan. No SOP's for the EOC had been prepared.

12. Public Information (Interface with News Media)

It was observed that there was a need to identify and train more PIO's to provide for shifts and continuous operations.

It was observed that the first evacuation message bogged down in description of Sector Boundaries. It necessitated translation in Simple Local language and landmarks. This procedure is too slow.

13. Accident Assessment (Monitoring, Reporting, Projecting, Coordination)

The field monitoring data on the first morning appeared to conflict with incident conditions. This may have been a problem with the scenario. The exercise demonstrated a need for closer coordination with the utility in the development of "canned" field monitoring data. There was no field monitoring data received by the Technical Support Center after noon of the first day. Field Monitoring teams were not kept aware of detailed progression of the incident and situation.

Information provided by the FEOC to Darlington County did not adequately address the hazards of radiation releases, nor did the information address the full scope of protective actions.

The exercise did not reveal that Darlington County had the capability to perform monitoring with the CDV 700.

Monitoring and registration at the Darlington Raceway were delayed over one hour due to the late arrival of the DHEC team.

14. Protective Actions (Evacuation, Shelter, Reception and Care)

There would have been a need for a greater number of radiological monitors at the Reception Center if the number of evacuees had been as great as the number indicated in the plan.

The need for the designation of alternate shelter managers was identified in the exercise.

15. Exposure Control (Access and Traffic Control, Use of KI Record Keeping)

Record keeping, as observed in the field was lacking. A need was demonstrated for better organizational management in the issuing, recording and use of Pocket Dosimeters. Dosimeters were distributed but were not recorded by serial number nor were they read at time of distribution. The FEOC was simulated to be a high radiation area, yet, little concern was observed over the exposure of personnel. Security of Dosimeters was lacking.

As indicated in 10 above (i.e., the need for closer coordination in the field) Highway Patrolmen remained in fields of 500 mr/hr with no advice or reporting requirements.

No observations were made regarding the discussion and decision on the use of KI for emergency workers.

Field monitoring teams were not advised to use KI.

Decontamination monitoring of field staff and vehicles (other than DHEC) was not evident.

16. Recovery and Re-Entry

Recovery and re-entry operations were observed only in their initial stages. There were no deficiencies noted.

17. Adequacy of Scenario to Test State and Local Plans

The scenario made available to Federal observers did not include a chronological sequence of events. This information, to include off-site radiation levels, is essential to ensure that significant response activities are observed and evaluated.

The scenario did not provide enough activity for the agencies located in the SEOC. Neither did the scenario provide Lee and Chesterfield Counties with enough exercise activity.

18. Benefit of Exercise to the Participants

Exercise did not provide enough play at the SEOC.

Exercise did not provide enough activity at county level to adequately determine benefit to participants.

19. Capability of Observed Jurisdiction, Agency and/or Function to Execute REP Plans to Protect the Public

The exercise demonstrated a Bureau of Radiological Health need to expand standard operating procedures to promote closer coordination with the utility.

While definite improvements are needed, the State of South Carolina is capable of executing its Radiological Emergency Preparedness Plans specific to the H. B. Robinson Fixed Nuclear Facility.

The lack of adequate space and facilities in Chesterfield County creates difficulties for county officials to implement the county plan.