

Nuclear Emergency Public Communications

Report of the
Susquehanna Alert Task Force

October, 1990



Pennsylvania Power & Light Company

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October 1990

PP&L's investigation of the February 3, 1990 alert at the Susquehanna Steam Electric Station has been completed. The attached report presents the Alert Task Force findings and recommendations.

We believe that implementing these recommendations will improve the emergency response capability available to the plant and will prevent a reoccurrence of problems encountered during the alert.

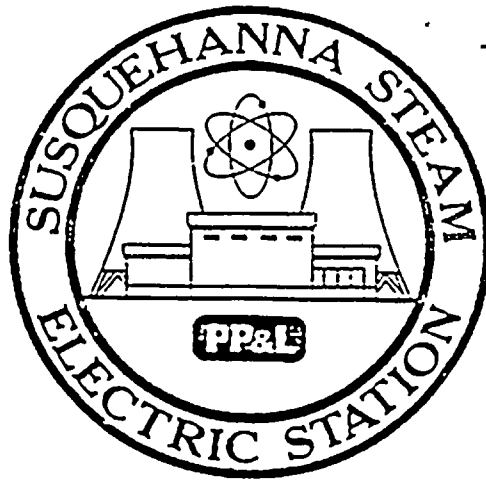
The Task Force wishes to thank all those who contributed to our investigation. Your insights and observations were most valuable in the accomplishment of our task.

A handwritten signature in dark ink, appearing to read "John H. Saeger", written over a horizontal line.

John H. Saeger
Chairman - Susquehanna Alert Task Force

Attachment





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SUSQUEHANNA ALERT

TASK FORCE

MISSION

In light of the 2/3/90 event, review internal and external communications for PP&L nuclear emergencies and recommend any technological, procedural and other changes to improve their timeliness & quality.

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October, 1990



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A. Executive Summary

The Susquehanna Alert Task Force's analysis of the recent Alert at SSES shows that by adopting a better coordinated, more unified approach to public and interagency communications PP&L can reduce the risk of repeating the communications problems and misperceptions that marred our otherwise positive performance the evening of February 3, 1990.

The Task Force recommends improvements to enhance the timeliness and quality of initial emergency notifications and subsequent follow on public communication. Some of the recommendations are comprehensive, involving upgrading of facilities and equipment for improved interagency communications and coordination. The remainder of the report is arranged to address each of the following audiences individually:

- County Emergency Management Agencies
- Public Officials
- News Media
- Employees
- General Public and Special Audiences

Most recommendations require procedural changes or the addition of communications hardware. All require some level of commitment from PP&L and/or other response organizations.

B. The Event

At 1753 hours on Saturday evening, 2/3/90, an ALERT was declared at the Susquehanna Steam Electric Station. Shutdown cooling isolation valves had been closed and could not be opened because of a fault in the reactor protection system. Therefore reactor water temperature could not be held under 200 F as required for the shutdown mode of operation. The technical solution was to allow the reactor temperature to rise causing the water to boil. The steam was rejected to the suppression pool via the steam relief valves and the heat was removed from the suppression pool using the residual heat removal system in the suppression pool cooling mode. The reactor heated up, pressure increased to about 16 psig, steam flow began and temperatures stabilized at about 252 degrees F. Normal shutdown cooling was restored at 2302 hours. At 0015 reactor temperature had been reduced to 192 F. At 0025 the ALERT was terminated.

C. The Critique

Although PP&L and all offsite agencies performed their actions in accordance with their pre-established plans and procedures, the general public experienced a much higher level of concern than in previous ALERTs at Susquehanna. Throughout the Emergency Planning Zone (EPZ), rumors conveyed an image of an "out of control" condition at the plant and of an "impending evacuation".

It appears that this increased level of alarm stems from a chain of events beginning with the "Emergency Notification Report" provided by PP&L to PEMA, LCEMA and CEMA. The brief description on the initial report stated, "UNABLE TO MAINTAIN PLANT IN COLD SHUTDOWN DUE TO RPS FAILURE". Subsequent reports provided identical information with notations of increased temperatures starting at 215 degrees and escalating thereafter. This information was then sent quickly and precisely to the municipalities.

Some of the municipalities interviewed understandably viewed this information as meaning that the current level was an ALERT, but that conditions were becoming worse or that PP&L did not have control of the reactor. Municipalities have the option under the ALERT classification to man their centers to the level they deem necessary; that is, either just a few key personnel or full staffing. Most municipalities fully staffed their Emergency Operations Centers (EOC), and some decided to call out route alert and traffic control teams and place them on standby.

Some of these route alert and traffic control teams were activated by sounding fire sirens. This put a message across scanners throughout the area that volunteers should report to their fire stations due to a problem at the power plant. This level of activation had never previously occurred for a radiological emergency inside the 10 mile EPZ.

The following issues heightened public perception of an out of control situation at the plant.

- ° The media began an almost immediate assault on PP&L and the offsite agencies just minutes after the notifications were made to the county and state emergency management agencies. Monitoring the EMA frequencies at the counties, the media knew of a problem when the County Directors were paged to report to their EOCs, only minutes after the ALERT was declared. All organizations were thereby receiving numerous calls before their facilities could be fully staffed.
- ° Among those alerted by scanner was the brother of Congressman Paul Kanjorski. He called the Congressman and informed him that an emergency existed at the plant. The Congressman then made two calls to the Special Office of the President, where he left messages with the answering service. At 1925 Mr. Woodeshick, the on-duty Public Information Manager (PIM) arrived in his office and returned Congressman Kanjorski's call. At least one-half hour elapsed between the Congressman's first call and an official communication from PP&L to the Congressman. He stated that he expected a response within 10 minutes of his call.

- The PP&L Media Operations Center was not operational until one hour and 47 minutes after the ALERT was declared.
- Upon reaching the Media Operations Center, the Public Information Manager began responding to the backlog of phone messages. His first call was to the Berwick Hospital which conveyed the escalated level of concern. Questioning the level of response being taken offsite in comparison to the condition of the plant, the PIM contacted the Luzerne County Emergency Management Agency. Two calls were made, one to the LCEMA Operations Officer and a subsequent call to the LCEMA Director. During the conversations, the PIM questioned the director if the actions being taken offsite were appropriate and in accordance with their plans.
- The LCEMA Operations Officer and, subsequently, the Director informed the PIM that they were merely following procedures in accordance with their Radiological Emergency Response Plan. (During a previous ALERT at SSES the Director was criticized for not manning municipal EOC's in accordance with the plans.) The PIM accepted the discussion and felt that the matter was dropped.
- The day after the ALERT, the "Sunday Times Leader" ran an article implying that the PIM had criticized the Director for overreacting to the ALERT. The Director subsequently called his own news conference to offer rebuttle to the article. Subsequent questioning of the newspaper's reports found that "nobody" knew who had reported the comments and the the PIM had, in fact, never publicly criticized Luzerne County's response.

D. Conclusions

- Language on the Emergency Notification Forms, though procedurally and technically accurate, did not convey the safe configuration the plant was actually in.
- An hour and 47 minutes elapsed before PP&L's Media Operations Center made its first public contact.
- There was little coordination of information between the PP&L MOC, the County EOC and PEMA. Consequently, the public received mixed messages about the levels of risk involved. The message conveyed by PP&L created problems for the counties and municipalities in implementing their plans.
- Conditions at the two county EOCs are crowded and the centers lack adequate communications equipment.
- The informal chain of notifications to PP&L Corporate Management, PP&L employees and Public Officials did not satisfy the need for timely and accurate information.

E. Methodology

In pursuing its mission, the Task Force toured the Columbia and Luzerne County EOCs and the PEMA EOC in Harrisburg. They also visited EOCs in Lehigh, Cumberland, Dauphin and York Counties. EOCs of risk counties at other nuclear power plants were also visited. In addition, members of the Team interviewed representatives of six area media outlets, representatives of the Associated Press and UPI in Philadelphia and employees of Rochester Gas & Electric and Virginia Electric & Power Co. They also visited Media Operations Centers at the Beaver Valley and TMI plants.

The work goals of the Alert Task Force were supplemented by using outside resources to assist in three areas:

- (1) An emergency planning consultant developed matrices to show the communication flow between PP&L facilities and outside agencies.
- (2) A communications specialist developed communication flow charts and provided an analysis of what information needs to be communicated and a recommendation of an integrated system to accomplish this.
- (3) An emergency planning consultant reviewed the existing county EOC's against their needs, desires and FEMA requirements. Also, he developed floor plans for each EOC, and estimated costs for modification to the Columbia County EOC and for a new EOC for Luzerne County. A contract design engineer and architect was also used to review the EOC layouts and provide building cost estimates.

Matrices traced the flow of emergency notifications and served as an effective vehicle for PP&L and counties to jointly and objectively begin work on resolving communications problems that surfaced during the February 3 Alert.

The consultant first reviewed plant and county plans and procedures and then met with key communicators from the emergency facilities to obtain operational input. A matrix was developed for each of the six facilities: Control Room, Technical Support Center, Emergency Operations Facility, Media Operations Center, Luzerne County EOC and Columbia County EOC. Each matrix showed by category the persons responsible for making the notifications, what communications were made at that facility, the sequence of notification, the estimated time frame, message content and informational needs of that facility.

The completed matrices detailed the notifications of each facility. All of the matrices together presented an overview of the total notification process. The Public Information Manager and County Emergency Management Coordinators will be able to use the matrix as a management tool for training purposes and analysis of current emergency operations which may result in procedural enhancements. The matrix was also used by the communications specialist as a basis for flow charting communications and recommending an integrated system.

F. Recommendations for Integrating Emergency Operations

The best way to protect PP&L's credibility during an emergency at the plant is to create an integrated emergency response operation. A number of options for facility/organizational changes which are the key ingredients necessary to achieve this objective were discussed.

Achieving Integrated Emergency Operations

In analyzing an effective integrated emergency response each primary response organization/facility can be compared to the cylinder of an engine. This "timing and coordination" of the cylinders directly control the engine performance. The optimal emergency response results from a finely tuned engine performing in an integrated fashion.

Since the "engine" ran a little rough during the February Alert, the task force decided to measure the performance of each organization and facility. We determined that some needed to be honed to improve overall performance.

Section 4-IV discusses the shortcomings of the Fowler Avenue Office, Susquehanna Energy Information Center, Berwick YMCA and Central Division Service Center as media operations centers and recommends a study be completed for a new MOC to be constructed or leased outside the ten mile EPZ. Section 4-III reviews the coordination of public messages between PP&L and the other county information officers. It recommends direct audio links between county and PP&L media centers and liaison persons in each center.

Coordination of public information between PP&L, the counties and state and federal agencies would be best achieved if all public information organizations shared the same facility. It would provide the best way to assure unified, prompt and accurate dissemination of public information from all of the response organizations. It would facilitate the dissemination of public information without the media interfering with emergency response functions. Through improved coordination it would enhance the credibility of all response organizations with the public. If all telephone calls from the general public within the EPZ and all media calls were directed to this center, rather than to three or four centers, control of rumors would be much more effective. Today, rumor control is almost non-existent.

RECOMMENDATION

Completely study the potential of constructing or leasing a Joint Media/Telephone Information Center.

G. Recommendations for Specific Improvements

The Alert Task Force examined public communication problems for each of the following audiences which surfaced during the Alert:

- ° County Emergency Management Agencies
- ° Public Officials
- ° News Media
- ° Employees
- ° General Public

This part contains specific recommendations to improve our communication with each audience.

SECTION 1

Plant Notification of Public Information Manager

Background/Findings

There is nothing more crucial to effective public communication than the early notification of the Public Information Manager. The events of Feb. 3 clearly point to the need for the PIM to be made aware of an emergency as soon as possible.

For instance, the first media phone call to the Special Office came at 6:21 p.m., just four minutes after plant security attempted to reach the PIM. Within 30 minutes of the first media call, five representatives of EPZ media had called the Special Office for information.

The media mobilize immediately, even on a Saturday evening. The Special Office must be activated as soon as possible and that activation cannot occur unless the PIM receives timely notice from the plant.

Getting early, accurate information to the media is an important part of the "rumor control" function. Without this quick action on the part of the PIM, rumors begin to develop and are increasingly difficult to correct.

In addition, the notification of public officials cannot occur in a timely manner if the PIM notification is not prompt.

Currently, the PIM is notified of an after-hours emergency through the plant duty manager, after the plant duty manager is notified by the control room. This arrangement has resulted in delays in the PIM notification because of the "extra link" in the notification chain. During normal working hours, the PIM is automatically tied into the emergency notification of the two counties.

RECOMMENDATIONS:

- 1.1. Amend the Emergency Plan procedures to include notification of the Public Information Manager as a responsibility for shift supervisor. Rationale: Under the current system, the plant duty manager -- who is not on-site after hours -- notifies the PIM of an emergency. This results in a built-in delay for the notification. A page at the same time the duty manager and the recovery manager are notified would improve the timeliness of the notification. Although this notice would be the responsibility of the shift supervisor, it could be delegated to lessen the demands on the shift supervisor's time.

- 1.2. Improve "coverage" of the PIM function through pager enhancements. Rationale: Expanding the number of people in the media operation who respond immediately to emergencies will reduce the time necessary to "staff-up" the various functions. In addition, a new pager system was instituted for the MOC staff on March 26. Since then, pagers have been added in both the Berwick and Allentown organizations. The number of pagers have been increased from 3 to 14.
- 1.3. Tie PIM pagers into TSC mobilization. Rationale: On Feb. 3, the PIM pagers were not part of the group that is alerted through the paging system when the Technical Support Center is activated. If they had been, the PIM would have received an earlier notice of the emergency because of the TSC activation, which occurred at about 5:44 p.m. Since that time, the PIM pagers have been integrated into the TSC mobilization phase of an emergency. This will give the MOC organizations an early warning on some emergencies.
- 1.4. Pursue portable cellular phone technology for PIM. Rationale: Two-way, instantaneous communications between the control room and the PIM would be the best way for information to flow. For that reason, portable cellular phones should be considered for the PIM function. At this time, however, there is insufficient coverage for cellular phones in the Berwick area.

SECTION 2

County EMAs -- Overview

The capability of Risk County Emergency Management Agencies (EMAs) to function during an SSES emergency is critical to the success of the off-site response activities. Their inability to demonstrate readiness and acceptable performance could result in loss of Regulatory acceptance of the SSES Emergency Plan. Under such circumstances, PP&L would be required to shutdown the Units pending resolution of the deficiency(s).

In order to assess the County EMA preparedness, the ALERT Task Force toured the SSES Risk County Emergency Operations Centers (EOCs). Their overall operations, with specific attention to problems and limitations, were discussed with the Emergency Management Director at each facility on multiple occasions.

To obtain additional information, members of the Committee also visited Emergency Operations Centers in Lehigh, Dauphin, York, and Cumberland Counties. A similar visit was also made to the Pennsylvania Emergency Management Agency (PEMA) EOC in Harrisburg.

The recommendations in this section are aimed at addressing the valid needs and concerns of Columbia and Luzerne County EMAs.

I. County EMA Emergency Operations Centers

Background/Finding

The capability of both risk counties to conduct Emergency Plan activities and maintain long-term volunteer support with current emergency operations centers is marginal.

The Columbia County Emergency Management Agency received "An Area Recommended for Improvement" (ARI) from the Federal Emergency Management Agency during the 1989 Full Scale Unannounced Exercise for the Susquehanna Steam Electric Station. The "ARI" noted the need for a larger operations area.

After the February Alert, Jim Siracuse, Director of the Luzerne County Emergency Management Agency stated that the amount of staff required to handle an actual Nuclear Incident compared to drills or other emergencies was much larger than originally anticipated. According to Siracuse, the crowded conditions affects the morale of his staff of volunteers.

If the EOC size issue is not resolved before future emergency exercises in Columbia County, the possibility exist that the "ARI" could be moved up to "An Area Requiring Corrective Action" or even a "Deficiency" which would require correction before the exercise would be considered complete.

RECOMMENDATION:

- 2.1 The counties should commit to providing space allocation for adequate Emergency Operations Centers. PP&L should provide support funding for renovation and setup based on counties commitment.

II. Plant Communications with County EMAs

Background/Findings

The SSES Emergency Organization communicates with the Counties via the Emergency Notification Report. Initial notification via Emergency Notification Report is the first communication of an emergency condition to noncompany personnel. This message is transmitted to the NRC, PEMA, LCEMA, CEMA and the PIM. During the 2/3/90 ALERT, the initial message and subsequent updates were timely and technically correct. The information, however, was not adequate for non-technical personnel to understand the severity of the event in the early stages. The message also did not consistently provide a prognosis of the worsening of the condition or termination of the event.

The County EOC personnel could not factor this additional knowledge into their subsequent communications or actions. Although actions of the County EOCs were taken promptly and in accordance with their Emergency Plan, this additional knowledge would improve their overall understanding of an event.

The information contained in the plant messages is also rapidly disseminated to a wide range of emergency personnel, the media and public at large. Scanners allow the media and general public to receive the information very quickly after the Counties mobilize. As a result, the public became aware that an emergency exists before the Company Organization was prepared to respond to their needs.

The communications that do occur between the Plant and the County EOCs are basically one-way communication. This does not give the County(s) the opportunity to obtain clarification of issues. The NRC, DER and PIM do have this capability. The potential impact of one-way communication is addressed in a recent (1989) publication of the National Academy of Sciences entitled, "Improving Risk Communication" A major recommendation was; "make sure that risk communication is a two-way process, but the limits of participation should be made clear at the outset."

RECOMMENDATIONS:

- 2.2. **Develop an SSES Emergency Action Level (EAL) Reference Manual.** The manual would provide general information relating to SSES Emergency Action Levels (EALs). Distribution would include appropriate off-site authorities involved in planning and response to emergency situations. Simplified narratives would describe what each EAL means and its significance to personnel and plant safety. Where appropriate, graphics would be included to enhance the understanding of the concepts involved.
- 2.3 **Prepare Emergency Notification Report messages consistent with the EAL Reference Manual.** Individuals and agencies possessing an EAL Reference Manual would refer to the Manual to obtain a better perspective of the emergency situation.
- 2.4 **Revise the Emergency Notification Form.** Incorporate a statement concerning the prognosis of the event. This information would be included in update messages, but not initial notifications.
- 2.5 **Review with the County EMA Directors, the methods of obtaining Clarification.** The EMA Directors can contact the Plant Communicator or PIM for clarification of status messages and plant conditions as appropriate.

III. Telephone Communications

Background/Findings

The availability of phones in major emergencies has been inadequate. All aspects of the operation depend in some degree on the availability of adequate phone capability.

Along with telephone communications for media contact, callout, and general communication (meal order, etc), the main areas requiring specific improvement are:

- a) **Rumor Control** - There are no figures available on how many calls were initiated from the public to rumor control. All that is known is that the phones available (two lines in each County) were constantly in use, and it can be assumed many callers did not get through. TMI Risk Counties each had 3-4 dedicated lines for rumor control.
- b) **EOC Key Staff Communications** - Each of the key staff has certain coordination responsibilities such as notification of schools, medical facilities, fire and police, ambulance, bus companies,

day-care centers, Red Cross, and others. Follow-up coordination is necessary for each of these, including assessment of needs (hospital beds, ambulance, etc.) and securing necessary facilities. Columbia County has 4 lines available and Luzerne has 10 lines. TMI Risk Counties had 4-12 dedicated lines, some of which were limited to outbound calls only.

- c) Backup - Adequate phone capability is also required since it is typically the only relatively sure backup for the other communication systems. The PEMA satellite link has yet to be proved reliable, PMARS is unusable in Luzerne and Columbia Counties (see later findings), and the volunteer radio communication plan has not always been successful.

RECOMMENDATIONS:

- 2.6 Provide a separate phone system for each EOC independent of the County PBX to allow direct inward calling and provide dedicated outward lines to ensure availability. Sufficient instruments and lines must be available to give each staff position adequate access. Separate lines should be available to rumor control and as backup for other functions as needed. Some method of determining proper number of rumor control lines must be developed.
- 2.7 Provide training for PP&L and County rumor control personnel to assure effective and integrated implementation of the rumor control functions. The training should emphasize appropriate feedback of public concerns to the public information personnel within the County and PP&L organizations. This will allow the media information to focus on concerns within the general public.
- 2.8 Provide automatic dialers, preset for appropriate agencies, for the key county staff positions to shorten line time and reduce errors.

IV. Electrical Power Capacity

Background/Finding

The electrical power capacity of the LCEOC is extremely marginal.

Investigation of this situation shows that the capability of the Luzerne Courthouse is adequate but that the individual circuit capacities and outlet availability in the EOC is inadequate. Some units must be unplugged to utilize other units either because of the lack of outlets in some locations or because of overloaded circuits.

Exposure - Certainly no additional electrical equipment can be considered without addressing this situation. The current operation is in serious jeopardy considering the state of the facility.

RECOMMENDATION:

- 2.9 A contractor should be hired to review the current electrical design of the Luzerne and Columbia County EOCs and assess requirements. The contractor should design and install the necessary circuits to enable the centers to utilize the equipment necessary to support the emergency functions.

V. PEMA Radio Communications

Background/Finding

PEMA UHF (PMARS) communications system is unusable by both LCEMA and CEMA due to inadequate coverage from the existing antennas. For the amount of communication necessary and the availability of other systems (telephone and satellite-based), this is not a major deficiency. However, since it is considered a link to PEMA and is used by other counties, it should be usable by LCEMA and CEMA rather than existing only as a "paper" system.

Counties need a reliable communication system for coordination with PEMA. The telephone is normally available as the primary system; however, telephone availability in both EOCs is always questionable. A teletype and computer link through satellite was unavailable until recently. Supposedly, that hookup was activated in late March, 1990; but has not been tested, as yet, in any drill. LCEMA indicates that as of April 12, there are still "glitches" in this system and, due to space limitations, it is not located where it can be effectively used. PEMA maintains a third system (PMARCS) utilizing UHF radio. Signal propagation has never been sufficient to permit LCEMA or CEMA to utilize this system.

RECOMMENDATION:

- 2.10 PP&L should formally request that PEMA resolve the coverage issue by relocating or adding repeater stations.

VI. Amateur Radio Club Usage

Background/Finding

LCEMA and CEMA depend on amateur radio operator mobilization to provide a backup network to the municipalities and medical facilities. The LCEMA mobilization met with limited success on the night of 2/3/90 due to uncertainties as to the status of the plant and the weather conditions. LCEMA is concerned about the viability of this secondary support.

The counties have radio communication to the municipalities and medical facilities for primary emergency communication. They rely on the mobilization of amateur radio associations to provide manning of backup radio facilities. The reliability of this scheme has been questionable as demonstrated by the lack of response in Luzerne County during the 2/3 alert. Conflicting information from PP&L sources led volunteers to believe there was no serious problem requiring their mobilization. Many decided not to report due to their understanding of the event status coupled with bad weather conditions that evening.

Exposure - Loss of communication between county and municipal EOCs and medical facilities. Other than the initial county notification, this communication is the most critical element for the successful coordination of the plan. Complete loss of communications would result in loss of coordination and even prevent initial notification to municipalities.

RECOMMENDATIONS:

- 2.11 Improve the telephone system capability to provide an adequate backup. Conferencing capability, fax broadcast, and automatic calling capability would all be possible enhancements to enable the use of telephones as backup. (See Recommendation 2.6)

2.12 Improve response of volunteers

- a) Include statement of the importance of emergency personnel completing their mission in each PP&L media release, regardless of severity (except unusual event). PP&L should elicit support of broadcast media in announcing such a message.
- b) PP&L should train EPZ employees in communicating with emergency plan volunteers so employees understand the importance of stressing the completion of their mission to the volunteers regardless of plant status.
- c) LCEMA should be requested to meet with the various amateur radio associations to review their importance to the plan and elicit suggestions on improving their response.



SECTION 3

Public Officials - Overview

In the event of an emergency at Susquehanna Steam Electric Station, public officials must be notified in a timely fashion. These officials can play a critical communications role with the general public, especially their constituents.

To be responsive, public officials need and expect timely information describing the event, time of occurrence, definition of the level of the event and the prognosis. In addition to the initial notifications, public officials expect updates throughout the event. To receive updates public officials can call the Media Operations Center.

On February 3, 1990, public officials received information regarding the "alert". Public officials were generally satisfied with the information provided. A meeting with the Northeast Delegation confirmed their satisfaction of PP&L performance during the alert. Although satisfied with our responsiveness on 2/3/90, initial communication with members of the Delegation requested earlier notification, preferably within 30 minutes of the event.

The success of our communications efforts with public officials will be measured by timeliness and accuracy. The following recommendations will improve the communications process with public officials.

RECOMMENDATIONS:

- 3-1 Initiate contacts with EPZ public officials within 45 minutes of a declaration of an Alert, Site or General Emergency.

Timeliness is extremely critical. The contact procedure to public officials should be initiated within 45 minutes of the declaration of an event. Completion of all initial contacts should be made within ninety minutes.

Public officials receive updates by calling the Media Operations Center. These updates will be provided by the P.I.M. or designate.

- 3-2 The Public Information Manager should be responsible for contacting EPZ public officials. This responsibility can be delegated to the Manager-Area Officials (EP-IP-031).

For the purpose of this guideline, the following are defined as public officials within the EPZ.

- U.S. Congressman - District 11
- State Senators - District 14, 29, 27
- State Representatives - Districts 109, 116, 117, 119
- Mayor - Berwick
- Chairman Township Supervisors - Salem Township
- Columbia County Commissioner (L. Whitmire)
- Mayor - Nanticoke

In the event of an emergency, the P.I.M. or designate will be responsible for first contacting the local offices or residences of EPZ public officials. If contact is not made at the local office or residence of a state or federal legislator, the P.I.M. or designate will call legislator's office and/or residence in Harrisburg or Washington.

The P.I.M. will maintain a public officials manual for use during an emergency. The manual will contain all information necessary to complete the process, including the order of calls to be placed to EPZ public officials.

The County EMA's are notified by the Control Room immediately upon the declaration of an event. The county officials notify the municipal Emergency Coordinators in the EPZ. The P.I.M. communicates with the county EMA's throughout the emergency.

3-3

Public Affairs should also contact state and federal legislators from the EPZ.

Public Affairs should first contact state and federal legislators at their Harrisburg or Washington offices or their out of town residences. If contact is not made, Public Affairs will contact the legislator's district office or residence.

Public Affairs will ascertain if a message from the plant has been received. If it has not, Public Affairs will provide a brief overview of the event by referencing a bulletin. If a message was received, Public Affairs will ascertain the legislators' frame of mind. When contact has been made, Public Affairs will direct the legislator to the P.I.M. for updates.

Public Affairs should maintain a log of all contacts. At the conclusion of the event, the log should be forwarded to the P.I.M.. Public Affairs will make follow-up calls. Public Affairs is notified by the News Manager.

3-4

Public Affairs will contact all key non-EPZ officials.

Public Affairs will be responsible for contacting all key non-EPZ elected officials. A list of these contacts will be maintained and updated by Public Affairs. This list will be made available to the P.I.M.

Public Affairs should maintain a log of all contacts. At the conclusion of the event, the log should be forwarded to the P.I.M.

3-5 The Office of General Counsel will continue to notify the PPUC.

In the event of an emergency, the News Manager will contact the Office of General Counsel to initiate contact with the PPUC. A contact procedure is in place. The Office of General Counsel only makes the initial contact. The caller directs the PPUC to contact the Media Operations Center for updates.

In the future, the Office of General Counsel should maintain contact with the PPUC.

The procedure and it's updating is the responsibility of the Office of General Counsel. The procedure must be updated to address the procedural change.

Each contact should be logged and the log forwarded to the P.I.M. at the conclusion of the event.

3-6 The Financial Department should continue to be responsible for contacting appropriate members of the financial community.

Upon notification, the Executive Vice President-Finance and CFO or designate, will notify appropriate members of the financial community. This notification is the responsibility of the General Office Operations Manager. (EP-IP-031). The Financial Department will maintain a contact procedure.

All contact should be logged and forwarded to the P.I.M. at the conclusion of the event.

3-7 Public officials should be notified of an "unusual event". An unusual event is the lowest level emergency at the plant. In the event of an unusual event, all internal contacts should be initiated. The procedure for contacting the county EMA's must be implemented. EPZ public officials should be notified on a timely basis. Consideration should be given to the seriousness of the event, the time of day and the probability of escalation to the alert stage.

The contacting of non-EPZ public officials should be at the discretion of Public Affairs. The P.I.M. will notify the News Manager. The News Manager notifies Public Affairs.

3-8 EPZ and Non-EPZ public officials should be notified upon the declaration of an alert, site and general emergency.

Upon declaration of an alert, site and general emergency, all public officials should be notified. The contact procedures should be implemented immediately upon declaration of an alert, site or general emergency.

At the alert stage, Public Affairs should utilize discretion for contacting non-EPZ legislators. Consideration should be given to the seriousness of the event, the time of day, and the probability of escalation.

3-9 Bulletins should be referenced when public official contacts are made.

All contact persons should be referencing a bulletin approved by the P.I.M. All bulletins are prepared by the News Manager. The bulletin should be read to the public officials. Updates can be provided to these officials throughout the emergency by calling the M.O.C at (717) 759-4957. News material will be prepared on an ongoing basis. Approved bulletins will be read to the caller.

The bulletin will include information describing the event, time of occurrence, and definition of the level of the event.

3-10 Additional Area Managers should be appointed to the P.I.M. call-out roster.

Selected Central & Susquehanna Division Area Managers should be utilized in the call-out procedures for contacting public officials. The Area Managers should be equipped with beepers. The procedure must be developed by the Special Office.

3-11 All contacts with public officials must be logged.

Logs are critical for record keeping purposes. All logs must be returned to the P.I.M. at the conclusion of the event.

3-12 Programmable phones should be available to P.I.M. Telephone numbers of public officials should be preprogrammed. This will reduce the amount of time required for notification. All telephones should be preprogrammed and updated as needed.

3-13 All contacts with public officials should be by a personal phone call.

A personal phone call rather than a recorded message is the preferred means of contacting public officials. The quality of the contact is maintained through personal contact. The public official will have the opportunity to ask questions for clarification.

3-14

The P.I.M. should meet with EPZ public officials, at least annually.

Annual meetings will improve communications and build credibility. This is extremely critical for new public officials.



SECTION 4

News Media

Overview

PP&L's relationship with the news media in the area of the Susquehanna plant has been generally positive. The establishment of a "Special Office of the President" in Berwick even before the plant went into operation is in large measure responsible for that positive relationship.

At the heart of the Special Office idea is the concept of establishing a single spokesman for nuclear information at PP&L. This spokesman, or a designee, is available 24-hour-a-day, seven days a week. This availability, combined with a commitment to issue news releases on any significant occurrence at the plant (even though not required), is an important factor in maintaining a high level of credibility for the company.

Task force interviews with representatives of area news media showed general satisfaction with the way the Special Office concept has worked. Most EPZ outlets are familiar with the personnel at the Special Office and say that PP&L is a credible source of information. One television station news manager did say that "PP&L is not interested in dealing with anything but good news," but that view appears to be in the minority.

The news media, especially local television and radio outlets, provide a method for PP&L to disseminate information about an emergency. Continuation of positive relationships with the media is essential so that the company is seen as a credible source of information. Without this credibility, the company spokesman will be ineffective in getting information to the public because his or her statements may be seen as unreliable.

To news media representatives, credibility is closely linked with the speed and candor with which a situation is discussed. Delays in communicating are often seen as an attempt to "manage" the news, putting public relations implications ahead of the public's right to know. This impression can deal a fatal blow to public information efforts. For that reason, many of the recommendations in this task force report concentrate on getting information to the company's public information manager quickly and relaying that information to the media as soon as possible.

Review of Feb. 3 "Alert"

Most of the initial media coverage of the Feb. 3 "alert" at Susquehanna was positive in the sense that it found no fault with PP&L's willingness to provide information about the event. In fact, a column in the Allentown Morning Call praised the company's efforts in this area and contrasted them to the experience at Three Mile Island.

After several statements by the director of emergency management in Luzerne County, however, the tone of the articles in area newspapers began to change. There were suggestions that PP&L was "downplaying" the incident and that the company's characterizations of the situation at the plant were making it difficult for the counties to implement emergency plans. There also was a claim by the Luzerne County EMA director that a PP&L spokesman had questioned the appropriateness of the level of the response by the county.

And, while there still seemed to be no real concern about the timely flow of information to the media during the incident, by a few days after the incident there was a debate over the role of PP&L versus the role of the counties during such an occurrence. During interviews, several media representatives expressed concern regarding the apparent "conflicting" information being given by PP&L and the counties.

During the event, there was some adverse public reaction but that began to subside as soon as the media reports began to carry complete information. This fact underscores the importance of getting an early start to quench rumors.

Other sections of the task force's report deal with the relationship with the counties and other officials. This section, however, deals with the implications for news media relations that arise from the Feb. 3 incident. This section does not deal explicitly with the early notification of the Public Information Manager (see Section 1), but the recommendations in this section will do little good if that prompt notice does not take place.

Overall, there seemed to be no serious media relations concerns resulting from the alert until problems were expressed by Luzerne County officials. There were, however, some problems with the gearing up of the public information function as the event unfolded.

The problems included:

- ° A delay of about 30 minutes in notifying the public information manager of the emergency at the plant.
- ° A delay of about 90 minutes in manning the Special Office to receive incoming calls and make the appropriate notifications of elected officials.
- ° A delay of about four hours before the first written communications was issued on the event.

- ° Delays in notification of company officials with a need to know about the emergency.

Although the public information manager held regular briefings beginning at about 8:30 p.m.; the entire operation was starting "in the hole" because much of the initial information had come from sources other than PP&L.

As a result of its study of the events of Feb. 3, the task force broke its news media relations recommendations into five categories: early notification of the media; media updates; coordination with other sources of information; the Media Operations Center; and other. Following is a category-by-category examination.

I. Early Notification of News Media

Background/Findings

The news media find out about emergencies of any sort in a variety of ways. In the case of Susquehanna emergency declarations, many in the news media are informed when the counties send a message to municipalities over their radio systems.

The notice to the counties comes directly from the control room within 15 minutes of an event being declared. The counties then alert the 27 municipalities around the plant via radio, which is monitored in many of the area's newsrooms. This means that media representatives will have questions minutes after an emergency is declared.

But not all media representatives will find out about an emergency by monitoring the radio broadcast. For that reason, we need a notification system to let all media know that something is happening at the plant.

On Feb. 3, that notification system consisted of issuing of a bulletin to the company's area managers, who then get the message to news outlets. On Feb. 3, however, the people were not in place to issue such a bulletin until about two hours following the alert declaration. By that time, according to the public information manager, the news media was already well aware of the alert so a bulletin was not issued.

The team found that early notice to the news media is most important because it immediately establishes PP&L as the primary source of information on the emergency. And, it gives the news media the appropriate phone numbers and locations for more information.

Without this early notice, PP&L is starting out from behind and must try to "catch up" to the event. The early notice puts PP&L on top of the situation and ensures that the details of the event are getting to the news media accurately.

The team found that the present early notice system for the media is inadequate and needs to be strengthened.

RECOMMENDATIONS:

- 4.1. **Develop pre-approved bulletins based on the Emergency Action Levels in the Emergency Plan.** Rationale: Pre-approved bulletins would decrease the time necessary to develop these messages and result in more effective early notifications of news media. The bulletins should contain some statement about county activity at this emergency level and should --in the text of the message -- note that a media operations center has been established in Berwick (and give the phone number for that center).
- 4.2. **Issue the bulletin message as an 800-line message so radio and television stations can use the exact language.** Rationale: This would get a message to the public directly from a PP&L spokesman. Many radio outlets would use the "voice" of the PP&L spokesman directly. The 800-line capability already exists on TW-4 in Allentown.
- 4.3. **Establish a sequence for notifying the EPZ media.** The recommended order of contact: 1) wire services; 2) television stations; 3) large radio stations; 4) newspapers. Rationale: In interviews with the Associated Press and United Press International in Philadelphia, the task team learned that the wires would issue a "bulletin" to all its outlets as soon as they receive a message from us. Thus, contacting the wire services quickly would provide us with the early notification of the media -- particularly the broadcast media -- in the EPZ. This also would assure that accurate information gets to the wire services, helping to control rumors in the early stages of an event. The wire services will get the story in any case; this will ensure that the "correct" information gets to them. The PIM then should follow this notice with individual calls to EPZ media.
- 4.4. **Issue bulletins to service area media by FAX machine.** Rationale: Using FAX machines to issue the bulletin would provide an immediacy that is not possible with the current arrangement, in which area managers are charged with delivering new material (including Susquehanna bulletins) to news media.

II. Media Updates

Background/Findings

As was documented by the events of Feb. 3, during an emergency at Susquehanna there is an immediate and continuing demand for information from the public and the news media. And, since most of the public's questions can be answered through the news outlets, the media naturally become the focus of the public information effort as an event unfolds.

Following the initial notice, PP&L's major vehicle for transmitting information to the media is through news briefings at the Media Operations Center. Interviews with the news media confirmed that this method is a desirable one in the eyes of the organizations "covering" the event.

The briefings are augmented by news releases and 800-line recordings that carry essentially the same messages as disseminated in the briefings. In addition, a team of PP&L area managers reports to the MOC to answer incoming calls from the media. Although the main focus of the media relations effort is on EPZ media, there is a great deal of interest in this kind of event from regional and well as national media. The needs of those groups also must be addressed.

Our findings indicated that the briefing system, both in terms of the information provided and the timing of the appearances, were satisfactory during the Feb. 3 incident. The task force, however, did identify some areas for improvements, including a "backing up" of phone calls in the first hour or so following the declaration of the alert.

There also are problems with the amount of space available for briefings at the Special Office on Fowler Avenue. This space limitation problem can be addressed with the move of the office of the Special Assistant to the President to the Susquehanna Energy Information Center.

RECOMMENDATIONS:

- 4.5. Add three media contact positions to the PIM pager roster. Rationale: By making the media contact positions available through pagers, the response time to the MOC will be decreased. This will allow for faster manning of this function and will alleviate some of the "busy signal" problems experienced by people calling in to the MOC.
- 4.6. Investigate phone system improvements. Rationale: A technological solution may be possible to handle the flow of calls to the MOC.
- 4.7. Review the addition to the Susquehanna Energy Information Center with attention to accommodating media at all "unusual events" and "alerts" as well as some low-level "site

emergencies." Rationale: There is a need for a facility that is larger than the current Special Office but that does not require the set-up time necessary for the Berwick YMCA (See Section IV). Expanding the facilities at the SEIC could provide accommodations for about 50 to 75 media representatives and federal/state/county officials. The space in the planned addition seems adequate, but communications equipment needs to be examined. (For more on MOC, see Section IV.)

- 4.8. Via FAX machine, send news releases to wire services to lessen likelihood of inaccuracies in wire service reports.
Rationale: The wire services will begin reporting the emergency at the plant shortly after it occurs. By sending releases directly to them, the risk of inaccuracies is decreased. The wire services will pick up the story from other sources in any case, so sending it to them directly lessens the likelihood of inaccuracies.
- 4.9. Via FAX machine, send news releases directly to news media in service area. Rationale: As is the case with the wire services, there is a need to get information to the service area news media as quickly as possible. The use of the area managers to deliver news releases results in delays that could result in inaccurate reporting and the need to correct those inaccuracies.
- 4.10. Improve ability to monitor media accounts of emergency.
Rationale: There is a need for the MOC organization to be aware of the coverage that the event is receiving for both rumor control and communications planning purposes. For that reason, the capabilities to monitor television news accounts should be enhanced at the Special Office and in Corporate Communications (network and Philadelphia/New York coverage of the event would be handled by Corporate Communications).
- 4.11. Investigate possibility of recording capability for PIM to issue broadcast-quality messages on the 800-line. Rationale: Although the current system does provide limited capability for recording the PIM's voice on the 800-line radio message, the process is time-consuming and would result in delay. There may be more sophisticated equipment available to accomplish this task more efficiently.

III. Coordinating with other sources of information

Background/Findings

One of the major concerns identified during our investigation of the Feb. 3 emergency was the apparent conflict between messages from the PP&L spokesman and county emergency officials. The Luzerne County emergency management director, for instance, said that PP&L's statements led to problems in mobilizing his forces for the event.

The director complained that he was not aware of the statements being made by the PIM and therefore was caught by surprise when reporters questioned him about certain statements. In addition, neither county knew of the lieutenant governor's broadcast over the satellite.

The task team examined the possibility of setting up a "split screen" system that would allow the county EMA to see the PIM briefings and vice versa. That approach -- considering that it would have to involve three locations -- was too costly, although the team does recommend an alternative (see Recommendations 4.16. and 4.17.).

RECOMMENDATIONS:

- 4.12. When possible, send a PP&L liaison to the county emergency centers during an emergency. Rationale: This would give the counties an on-site person to answer generic-type questions about the plant and the ongoing activities there. In combination with the EAL booklet, this would help put into perspective the actions at the plant.
- 4.13. Request a county public information liaison for the MOC. Rationale: With a county public information person at the MOC, there would be better opportunity for a truly unified approach to the media relations. The county spokesman could "share" the stage with PP&L's PIM.
- 4.14. Set up conference call capability among the PIM, emergency directors at both counties and PEMA. Rationale: This will ease the process for communications among these organizations and will improve coordination of public statements.
- 4.15. Set up an audio link so counties can hear what is being said in MOC briefings. Rationale: This will allow the county emergency personnel to hear exactly what is being said in the MOC.
- 4.16. Set up an audio link so PP&L can hear what is being said in county briefings. Rationale: This will allow MOC personnel to hear what county officials are saying.

IV. Media Operations Center

Background/Findings

An examination of the facilities in which media relations are handled during an emergency was an essential part of the task force responsibility. Our investigation involved a study of PP&L's present facilities (the Fowler Avenue Special Office and the Berwick YMCA), the Susquehanna Energy Information Center (soon to be the headquarters of the special assistant to the president), and the Media Operations Centers of other utilities.

There were some problems noted with the PP&L facilities:

- The Fowler Avenue location is severely limited for handling of press briefings.
- The Berwick YMCA is difficult to establish as the MOC because of maintenance of the facility, communications requirements and equipment set up.
- There are concerns regarding the ability of personnel to set up the YMCA within the four-hour target that we have established.
- The Berwick YMCA is located within the 10-mile EPZ which could be evacuated in an emergency.

These problems were considered in deliberations regarding the need for upgrades to the present facility or building of a new one to house the Media Operations Center.

Several options were discussed, including an examination of a recent OER recommendation that the third floor of the YMCA be renovated and that communications equipment be permanently installed there. The task force also discussed the possibility of building a new MOC, outside the 10-mile EPZ.

The least-cost alternative would be to renovate the third floor of the YMCA and permanently install communications equipment, including phones and computers. There is, however, a problem with this approach. The YMCA, as noted earlier, is located within the EPZ and could be evacuated in an emergency. In fact, because of state operations, our current practice of recommending precautionary evacuation within a two-mile area when dealing with a general emergency might actually result in an earlier evacuation of the 10-mile EPZ than would have been the case a year ago.

Another factor in the task force recommendation is that the move to the Susquehanna Energy Information Center will give the company better capability to handle lower level emergencies (see Recommendation #11). In most instances, this would give us more time to activate the YMCA as the MOC, thus alleviating some of the setup concerns.

Another concern is the "backup" MOC in Hazleton. This facility has never been activated in an emergency. Considering that it only would be activated if we were in a general emergency -- meaning intense media attention -- it would be wholly inadequate to serve in this capacity.

RECOMMENDATIONS:

- 4.17. Study the need for a new MOC outside the 10-mile EPZ. Rationale: There is an exposure at this point to moving three times in an emergency -- from the SEIC to the YMCA to the Hazleton S.C. In addition, the Hazleton facility would not be adequate to assume the necessary functions in a general emergency. A facility outside 10 miles, with communications equipment installed and ready to operate, would give us proper capability to respond to an emergency that overwhelms our abilities at the SEIC.
- 4.18. Shift systemwide news material dissemination responsibilities to Corporate Communications in the General Office. Rationale: One of the concerns regarding the MOC setup is the connection to PP&L's mainframe computer, which is necessary to issue news material to field locations. That communications hookup is necessary because news material on an emergency is sent directly from the MOC after activation rather than from the General Office as is the case in day- to-day operation and at lower levels of emergency. Shifting the news material dissemination to the General Office would allow MOC personnel to concentrate on getting news material out to the media in that facility. Through a simple PC modem, writers in the MOC could send approved news material to Corporate Communications for distribution to service area media and to all PP&L field offices.
- 4.19. Provide training and exercises for Central Division S.C. personnel regarding nuclear emergency plan. Rationale: Current plans call for the Central Division Service Center to serve as the backup MOC and EOF if the Berwick-area is evacuated. Training has not been done for those who would be involved with the set-up of this facility. In addition, this setup has not been exercised in emergency drills.

V. Other

Background/Findings

There were several items referred to the task force that did not fit into any specific category.

One item considered was the installation of dedicated phone lines from the Public Information Manager to the Emergency Director and the Recovery Manager. After discussion, the group decided this was unnecessary because the present phone system is adequately serving the needs of the PIM.

There also were suggestions that, for record-keeping purposes, the phone conversations of the PIM be automatically recorded during an emergency. There were similar suggestions regarding all statements made by the PIM during an emergency.

Questions also were raised concerning how to deal with reporters who show up at the Susquehanna plant.

RECOMMENDATIONS:

- 4.20. Tape record the phone conversations of the PIM during an emergency. Rationale: This would provide a record of the events as they unfold. One of the problems following the Feb. 3 alert was that it was very difficult to "reconstruct" events. Similar action is being taken for the Recovery Manager and the Emergency Director.
- 4.21. Tape record news briefings of the PIM. Rationale: Although this is being done on an informal basis at this time, making an audio tape of the PIM's news briefings should be part of the emergency plan. This would provide an excellent record to document the flow of information.
- 4.22. Plan for "close-out" communications. Rationale: When an emergency event ends, the media interest will go on. The PIM's emergency plans should include some reference to post-event communications. In many instances, this could be handled with "day-after" news briefings.
- 4.23. Develop a Susquehanna notebook for news media representatives in PP&L's service area. Rationale: Such a notebook, to be distributed to media annually, would include information about the plant as well as details on what actions are taken during an emergency.

SECTION 5

Employees -- Overview

Employee communication is essential during any corporate crisis. Employees have a special interest in events that pertain to their company. If employees do not receive timely, accurate, and clear information, morale can be adversely affected. Poor communications can result in a company losing its credibility with its employees.

In order to assess PP&L's SSES emergency communications with its employees, employees were divided into 10 categories:

1. All employees
2. On-site plant personnel
3. Off-duty plant personnel
4. Non-nuclear PP&L employees residing or working in EPZ
5. M&ED managers and area managers
6. Nuclear Department personnel
7. Customer Contact Center
8. Nuclear Management
9. Senior Executives
10. Local 1520 and 1600 leaders

The recommendations in this section of the report are aimed at meeting the varying informational needs of PP&L employees. (Table 5.1 at the end of this section summarizes the recommendations.)

I. All PP&L Employees

Background/Findings

Employees have a special interest in events that pertain to PP&L. During an emergency, it is not unusual for family, friends, and neighbors to turn to an employee for information and insight. However, employees, in general, are no better informed than the general public.

The average employee did not understand the February 3 Alert, nor could he/she explain what happened after the fact. Most employees do not have a basic understanding of SSES or what a nuclear emergency declaration at SSES means.

Currently, when an emergency occurs during the workday, news releases from Corporate Communications are posted on bulletin boards throughout the Company. However, if an incident occurs off-hours or over a weekend (as the February 3 Alert did), employees without direct emergency responsibilities learn of the emergency in the same manner as the public -- via the media. Employees, under these circumstances, can feel isolated.

RECOMMENDATIONS:

5.1 Educate all employees on the Emergency Plan. Topics covered should include:

Four emergency classifications.

Roles of PP&L and County Emergency Management Agencies during an emergency.

Possible public protective actions which could be required (highlighting that the sounding of sirens does not mean to evacuate, but rather to tune into an Emergency Broadcast System).

Basic overview of how SSES operates.

For employees who either work or reside in Columbia or Luzerne Counties, a training session and/or videotape should be developed. For all employees, written material, similar to the "Emergency Information" brochure mailed to residents of Columbia and Luzerne Counties, should be provided as a minimum. If possible, the training session and/or videotape should be extended to all employees. The responsibility for developing this training program would be delegated to the SSES Training Center with support from Emergency Planning. The responsibility to ensure employees are trained would belong to division and department heads.

Rationale: Employees who have this basic background will be able to better understand what is being reported during an emergency and will be able to more easily recognize unfounded rumors. (Example: Rumor that Berwick was evacuated at the Alert could be recognized as unlikely.) In addition, informed employees would be able to respond knowledgeably, if they so desired, to questions by their neighbors, family, relatives, and friends and, as such, aid in rumor control.

5.2 Utilize the 800 "Employee Phone Line". The 800 phone line, which already exists, should be activated during an SSES emergency by Corporate Communications. When an employee dials the number, he/she will hear a recorded message that is based on the latest new release. The line would remain in service 24 hours a day until the emergency is over.

The advent of the 800 employee phone line would be publicized through bulletin board postings and a PP&L Today article. Additionally, during an emergency a bulletin board item would be posted reminding employees of the number.

During drills the 800 phone line should be activated and messages should be updated as Corporate Communications issues news releases. The final message would indicate that the event has terminated.

Rationale: The purpose of the 800 line is to keep those employees, who so desire, informed of the situation. Employees, especially during a site or general emergency, may be overwhelmed by news stories. The employee phone line would provide them not only information on the situation, but also a link to the company.

II. On-Site Plant Personnel

Background/Findings

Currently limited information is conveyed to plant personnel who are not involved in the emergency. As a result, on-site employees are not kept informed. Three specific concerns were identified:

Some plant personnel called home to tell their families "to start packing." This was clearly an overreaction to the event and could lead to public panic since the public would assume that someone inside the plant would have the best grasp of the situation.

Some plant personnel were contacted by friends who were Emergency Management Agency volunteers to check on the plant status. When they were told the plant was under control, these volunteers decided not to report for their volunteer duties.

Plant personnel, upon departure from the plant or arrival to the plant, may be met by media trying to interview them.

RECOMMENDATIONS:

- 5.3 Inform on-site employees about plant status over the Standard Plant PA system. The Communicator inside the plant can announce the message issued to the County EOCs over the Standard Plant PA system. Updates/enhancements as deemed appropriate by the Emergency Director may be incorporated into the message. This PA system should be used during drills and the additional role of the communicator must be recognized in the procedures.

Rationale: Using the standard plant PA system, would provide employees in the plant with updates on the plant condition as time progresses and keep them informed of events happening around them.

- 5.4 If the emergency has a long duration, post new releases (issued by Corporate Communications) on bulletin boards throughout the plant at the start of the first working day. Plant supervisors should remind their employees to look at the bulletin boards.

- 5.5 Provide training to plant security personnel and plant staff regarding media coverage of an emergency. Employees should be reminded to avoid speculating about the condition of the plant to the media because the media/public will perceive them as company spokespeople. Personnel can expect to be questioned by media upon arrival or departure, especially if all non-essential plant personnel are released from the plant. Through training sessions, security personnel and employees should be instructed to refer inquiries to the Media Operations Center. When an employee is confronted by the media, he/she should respond something along the lines that "I do not want to give inaccurate or untimely information, so it is best that you contact the Media Operations Center (MOC) which has the most current information." When employees are released from their Accountability area, the lead individual should be responsible for reminding them to refer the media to the Media Operations Center.

Procedures should be implemented to recognize this responsibility of the lead individuals. Also, the lead individuals should be given a packet of prepared material when a Call to Accountability occurs. Included in this packet would be a reminder that employees should be reminded to refer media to the MOC.

III. Off-Duty Plant Personnel

Background/Findings

The informational needs of off-duty plant personnel were not considered to be any different than that of all PP&L employees (refer to Section 5.I.). As such the following recommendations are made:

Educate employees on the Emergency Plan through a training session and/or videotape.

Activate the 800 "Employee Phone Line."

IV. Non-Nuclear PP&L Employees Residing or Working in EPZ

Background/Findings

The informational needs of non-nuclear PP&L employees residing or working in the EPZ were not considered to be any different than that of all PP&L employees (refer to Section 5.I.). As such the following recommendations are made:

Educate employees on the Emergency Plan through a training session and/or videotape.

Activate the 800 "Employee Phone Line."

V. M&ED Managers & Area Managers

Background/Findings

During an event, Corporate Communications notifies all M&ED Managers who then notify those Area Managers who report to him/her. The role of the Area Managers is to deliver news releases to local media. Prior to and including the Feb. 3 Alert, M&ED Managers were notified of an event by Corporate Communications when a bulletin was issued. However, during the Feb. 3 Alert, an initial bulletin was not issued because of the delay in notifying the PIM. As a result, M&ED Managers (and subsequently Area Managers) were not notified until after 10 PM.

RECOMMENDATIONS:

- 5.6 Call the M&ED Manager within 30 minutes of manning Corporate Communications -- even if no bulletin is issued. This call by Corporate Communications will be made for all four levels of emergency. If the emergency is off-hours, the call will be made to the M&ED Managers' homes. The M&ED Managers then call the Area Managers. The Area Managers will receive updates on the situation each time a news release/bulletin is issued via a hardcopy sent over the printer. However to avoid delays, news releases will be sent directly to the news media in the service area via fax machine. The Area Managers will now serve to facilitate media relations rather than hand delivering news releases. It should also be noted that the three EPZ Area Managers, who are part of the media contact crew, are now notified via pagers which are activated by security upon declaration of an emergency in order to allow faster manning of this function.

VI. Nuclear Department Personnel

Background/Findings

The informational needs of Nuclear Department personnel apart from top nuclear management (see Section 5.IX.) were not considered to be any different than that of all PP&L employees (refer to Section 5.I.). As such the following recommendations are made:

Educate employees on the Emergency Plan by mailing them a brochure explaining the Emergency Plan (or through a training session and/or videotape).

Activate the 800 "Employee Phone Line."

Additionally, it should be noted that the Nuclear Department issues updates to its department, and news releases (from Corporate Communications) are posted on bulletin boards throughout the department.

VII. Customer Contact Center

Background/Findings

The new Customer Contact Center (centralized in the Allentown area) will be publicized as the one place for customers to call when they have an inquiry or complaint. It will be operational 24 hours a day. There will be a lot of publicity surrounding this one number. It is reasonable to anticipate that customers and the general public will call the Customer Contact Center during a nuclear emergency.

During normal office hours, there will be 100 trained people answering customer inquiries. These employees will be trained to effectively handle canned messages. At night, there will be three dispatchers.

RECOMMENDATIONS:

- 5.7 Notify the On-Duty Manager or Supervisor of the Customer Contact Center of an emergency at SSES to ensure adequate staffing and also provide news releases to the Customer Contact Center. The notification would be the responsibility of Corporate Communications, along with the provision of news releases and bulletins of news briefings. Notification should occur within 30 minutes of manning Corporate Communications. The news releases and bulletins of news briefings could be sent via Public News in TOSS. This information can then be used to answer inquiries from customers. Personnel must be trained, however, not to answer media calls. Media calls should be forwarded to the Media Operations Center. It should be noted that Emergency Planning has already scheduled training for personnel.

Additionally, a rumor control coordinator should be designated to monitor and analyze calls to determine if there are any trends developing. Each phone operator would record the nature of the call, and this written information would be collected by the rumor control coordinator. If a trend began to develop, the rumor control coordinator would then notify the PIM who would then address the rumor(s) at his next news briefing. Furthermore, the Customer Contact Center should be recognized in the Emergency Plan Procedures and should participate in the emergency drills that are scheduled throughout the year.

5.8

Consider using the Customer Contact Center to aid in rumor control by answering public inquiries that are directed to the Special Office. It should be noted that PP&L does not want to usurp the rumor control responsibilities of the counties, but PP&L must be prepared to handle rumor control. During an emergency, the PIM could transfer the general public phone lines down to the Customer Contact Center if the PIM is inundated with calls. The PIM would have the flexibility to call forward one, two, or all three of the public lines to the Customer Contact Center. If the person calling still wants to talk to the Special Office, then the call could be directed back to the Special Office. This arrangement could help alleviate some of the demands placed on the PIM during an emergency.

If the Customer Contact Center is utilized for rumor control, then a method for handling a large volume of calls at night must be developed (since three dispatchers may be inadequate). Procedures for calling in off-duty personnel already exist and should be implemented if a flood of calls occurs during the night as a result of a nuclear emergency. Additionally, separate lines for the public and media must be maintained. Currently the public line is Ext. 2281 and the media line is Ext. 2285. However, the media also calls on the 2281 line. Corporate Communications will now specify at the top of news releases that media should use the 2285 line. Furthermore, as stated in Recommendation 7, a rumor control coordinator must be designated to monitor and analyze calls to determine if there are any trends developing and the Customer Contact Center should participate in drills.

VIII. Nuclear Management

The notification of nuclear management (below the Vice-President level) is not considered within the scope of the task team. Communications at this level are associated with the implementation of Emergency Plan activities. As such, the Nuclear Department has the responsibility to determine who within its organization should be notified of an emergency and to establish appropriate procedures.

IX. Senior Executives

Background/Findings

During the workday, all executives are delivered news releases by Corporate Communications. Outside of normal office hours, the following chain of notification exists:

The PIM calls the President/CEO and the Senior VP-Division Operations.

Corporate Communications call the Executive VP & CFO, Senior VP-General Counsel, VP-Public Affairs, and Associate General Counsel-Regulatory Affairs or their designated back-ups.

The Plant notifies Senior VP-Nuclear, VP-Nuclear Operations and Superintendent of the Plant-SSES. Either the Superintendent of the Plant or VP-Nuclear Operations notifies Executive VP and COO.

The Power Control Center (which is notified by Plant) notifies Manager-System Operation and VP-Power Supply. Either the Manager-System Operation or VP-Power Supply then notifies the Senior VP-System Power & Engineering.

RECOMMENDATIONS:

- 5.9 Formalize the chain of notification for senior executives in writing, if explicit procedures do not already exist. This will ensure the chain is not broken as a result of employee turnover, retirement or promotion. For instance, per an NDI, the PIM is charged with notifying the President/CEO. However, this duty is not reflected in the Emergency Plan. Position Specific Emergency Plan Procedures should be developed to reflect assigned notification responsibilities. In case the senior executives are unavailable, the procedures should designate back-ups for the senior executives and should specify that the back-up should try to reach the top person in each department eventually to apprise him/her of the incident.

In terms of speed of notification, all senior executives' notifications should be made within 30 minutes of notification of the designated contact person (i.e., PIM, Plant, Power Control Center). During the workday, senior executives are updated via news releases. During off-hours, the senior executives will determine their needs for updates (by calling the PIM for updates if they so desire). However, a post event closeout call by Corporate Communications should also be made to each senior executive when the event has terminated.

- 5.10 Ensure that all key executives are trained in "How to Deal with a Hostile Environment." This training is critical for those executives who can be expected to respond to media inquiries or to testify at a Congressional/state legislature inquiry should a major crisis occur.

X. Local 1520 and 1600 Leaders

During the February 3 Alert, the Local 1600 leader heard about the event and called the VP-Human Resource and Development for details. The VP-HR&D had not been notified of the event and was unaware of it. The VP-HR

was able to find out about the plant condition and relay the information to the union leader.

RECOMMENDATIONS:

- 5.11 Corporate Communications should notify the VP-HR&D. Corporate Communications should add VP-HR&D to its notification list and distribution list for hand-carried news releases during the work day. Notification would occur within 30 minutes of Corporate Communications manning. Furthermore, the VP-HR&D should be notified and updated during drills.

Rationale: Union leaders will direct their inquiries to the VP-HR&D. In order to answer such inquiries in a timely manner, the VP-HR&D must be notified of SSES emergencies.

- 5.12 VP-HR&D should notify Local 1520 and 1600 leaders of any SSES emergency greater than an Unusual Event. For an Unusual Event, the VP-HR&D should use discretion as to whether or not to contact the union leaders. Factors to consider during an Unusual Event include the seriousness of the event, the time of day, and the probability of escalation of the emergency.

Rationale: It is important for the union leaders to be notified of SSES emergencies at Alert, Site or General Emergency so that they may respond to the needs of their union members. However, Unusual Events can be innocuous. Therefore, the VP-HR&D is given discretion to determine whether or not an Unusual Event warrants the attention of the Local 1520 and 1600 leaders.



TABLE 5.1
SUMMARY OF RECOMMENDATIONS
EMPLOYEES

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
On-Site Plant Personnel	Standard Plant PA System	Communicator inside Plant	Triggered by messages sent to County EOCs	Message is identical to one issued to County EOCs-Emergency Director can enhance/update message if he/she so desires	At the discretion of the Emergency Director
	News releases posted on Plant bulletin boards	Corp. Communications	Corp. Communications issues bulletin board posting	Message is based on latest news release	Message is updated whenever a news release is issued
Off-Duty Plant Personnel	Activate 800 Employee Phone Line	Employee initiates call	Phone lines activated by Corp. Communication when first bulletin is issued	Message is based on latest news release	Message updated whenever a news release is issued
Non-nuclear Employees in EPZ	Activate 800 Employee Phone Line	Employee initiates call	Phone lines activated by Corp. Communication when first bulletin is issued	Message is based on latest news release	Message updated whenever a news release is issued
M&ED Managers	Phone Call	Corp. Communications	Within 30 minutes of manning Corp. Comm.	Emergency has been declared at <u>Time</u> because _____	Message updated whenever a news release is issued

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
On-Site Plant Personnel	Additional role of Communicator must be recognized		PA System should be used during drills	Train employees on E-Plan and to refer media who are at the site to the MOC Lead individual at Accountability Area must remind personnel to refer media to Special Office prior to releasing them	Final message will indicate event has terminated Final bulletin posting will indicate event has terminated
Off-Duty Plant Personnel	Role of Corp. Comm. in activating 800 Employee Phone Line & updating message must be recognized	800 Phone Line System already exists. Ability to handle volume of calls may need to be addressed	800 Employee Phone Line should be activated during drill & message should be updated	Train employees on E-Plan and to refer media who are at the site to the MOC	Final phone message will indicate event has terminated
Non-nuclear Employees in EPZ	Role of Corp. Comm. in activating 800 Employee Phone Line & updating message must be recognized	800 Phone Line System already exists. Ability to handle volume of calls may need to be addressed	800 Employee Phone Line should be activated during drill & message should be updated	Train employee on E-Plan	Final phone message will indicate event has terminated
M&ED Managers	Corp. Comm. will now call M&ED Manager within 30 min. of manning-irregardless if bulletin is issued		M&ED Managers should be called during drills		Final news release will indicate event has terminated

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
Non-EPZ Area Managers	Phone Call and Hardcopies of any bulletins/news releases via printer	M&ED Managers (Phone Call) Corp. Communications (Hardcopies)	Area managers should be notified immediately after M&ED Manager is notified	Message based on latest news release	Message updated whenever a news release is issued
Three EPZ Area Managers	Paging system	Security activates page	At declaration of an emergency	<p>Message is identical to to one issued to County EOCs</p> <p>Purpose of notification is for these Area Managers, who are part of media contact crew, to go directly to MOC</p>	
Nuclear Department Personnel	Activate 800 Employee Phone Line	Employee initiates call	Phone Line activated by Corp. Comm. when first bulletin is issued.	Message is based on latest news release	Message updated whenever a news release is issued
	News releases posted on bulletin boards throughout Dept.	Corp. Communications	Corp. Comm. issues bulletin board postings.		Bulletin board postings updated whenever a news release/bulletin is issued

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
Non-EPZ Area Managers	Change in role of Area Managers must be recog- nized Area Managers now serve as media relations (rather than delivering news releases to local media)		Non-EPZ Area Managers should be notified during drills & hard- copies of news releases sent to them over printer		Final news release will indicate event has terminated
Three EPZ Area Managers	Addition of these EPZ Area Managers to the Paging Procedure	Pagers already purchased	EPZ Area Managers should be paged during drills		
Nuclear Department Personnel	Role of Corp. Comm. in activating 800 Employee Phone Line & updating message must be recognized	800 Phone Line System already exists	800 Phone Line should be activated during drill & message updated	Receive info (or training) on E-Plan	Final Phone Message & Bulletin Board posting will indicate event has terminated

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
General Employees	Activate 800 Employee Phone Line	Employee initiates call	Phone Line activated by Corp. Comm. when first bulletin is issued	Message is based on latest news release	Message updated whenever a news release issued
	News releases posted on bulletin boards throughout Dept.	Corp. Communications	Corp. Comm. issues bulletin board postings		Bulletin board postings updated whenever a news release/bulletin is issued
Customer Contact Center On Duty Supervisor or Manager	Phone Call	Corp. Communications	Within 30 min. of manning Corp. Comm.	Emergency declared at <u>Time</u> because _____	
Customer Contact Center Personnel	On-Duty Supervisor alerts personnel	On-Duty Supervisor	As soon as On-Duty Supervisor notified he/she notifies personnel		
	News releases and bulletins of news briefings obtained via Public News over TOSS	Corp. Communications provides news releases and bulletins of news briefings	Triggered by news release or news briefings	Message based on latest news release or bulletin of news briefing	Message updated whenever news release or bulletin updated
Nuclear Management (Sub-VP level)	At discretion of Nuclear Dept. since associated with the implementation of the E-Plan				

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
General Employees	Role of Corp. Comm. in activating 800 Employee Phone Line & updating message must be recognized	800 Phone Line System already exists	800 Phone Line should be activated during drill & message updated	Receive info (or training) on E-Plan	Final Phone Message & Bulletin Board posting will indicate event has terminated
Customer Contact Center On Duty Supervisor or Manager	Corp. Comm. will now call Customer Contact Center On-Duty Supervisor/Manager		Call to Customer Contact Center Supervisor should be made during drill		
Customer Contact Center Personnel	On-Duty Supervisor notifies personnel News releases and bulletins of news briefings sent by Corp. Comm. to Customer Contact Center via Public News on TOSS Corp. Comm. specifies on news release for media to use 2285	If used as rumor con- trol, ability to transfer public calls from Media Operations Center to Customer Contact Center is required (This is the 2281 line)	Customer Contact Center should partic- ipate in the drills. News releases and bulletins of news briefings should be sent to Customer Contact Center during drill	Training required on rumor control-refer media to Media Operations Center Emergency Planning scheduled to train personnel	Final news release will indicate event has terminated

Nuclear
Management
(Sub-VP
level)

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
Senior Execs. Pres./CEO Sr. VP- Div. Oper.	Phone Call or hand delivered news releases (during workday)	PIM	Within 30 min. of PIM's notification	Plant Status Time of Emergency Prognosis Classification of Emergency Public protective actions required?	Updated via news releases during workday During off-hours senior executives determine their needs for updates. (Call PIM for updates if they so desire)
Exec. VP & CFO Sr. VP & Gen. Counsel VP-Public Affairs Assoc. Gen. Counsel VP-HR&D	Phone Call or hand delivered news releases (during workday)	Corp. Communication	Within 30 min. of Corp. Communications manning		
Sr. VP-Nucl. VP-Nuclear Operations Supt. of Plant SSES	Phone Call or hand delivered news releases (during workday)	Plant	Within 30 min. of Emergency declaration		
Mgr-System Operations VP-Power Supply	Phone Call or hand delivered (during workday)	Power Control Center (PCC)	Within 30 min. of PCC's notification		
Exec. VP & COO	Phone Call or hand delivered (during workday)	Either Supt. Plant or Sr. VP-Nuclear			
Sr. VP-SP&E	Phone Call or hand delivered (during workday)	Either Mgr. System Operations or VP-Power Supply			

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
<u>Senior Execs.</u>	Formalize notification chain in procedures (along with rapidity of notification)		Senior executives should be notified during drills	Training recommended on "How to Deal with a Hostile Environment" for key executives who can be expected to have to respond to media inquiries or to testify at a Congressional/ State legislative inquiry	Corp. Communications will notify each executive by phone when an event has terminated

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/ Frequency
Local 1520 & 1600 Leaders	Phone Call (for an Alert or Greater)	VP-HR&D (for an Unusual Event, VP-HR&D may use discretion about notification)	Upon notification of VP-HR&D	Message based on latest news release	At discretion of VP-HR&D

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
Local 1520 & 1600 Leaders	Corp. Communications must add VP-HR&D to notification list & distribution list		VP-HR&D should be notified during a drill & should receive handcarried releases		Corp. Communications should call VP-HR&D when event has terminated

SECTION 6

General Public -- Overview

The primary means of notifying the public and keeping them informed during a nuclear emergency is through the media. The general public is kept informed via news briefing by the PIM as well as news releases issued to the media (radio, TV, and newspaper) by Corporate Communications. However, via scanners, the media and public know within minutes that an event has occurred. Information and rumors then spread like wildfire. Although PP&L and all off-site agencies performed their actions in accordance with their pre-established plans and procedures, the general public experienced a much higher level of concern than in previous Alerts at SSES.

This section assumes that the general public is receiving timely and clear information from the media and deals only with problems that were identified which are not related to media issues and is divided into five categories: general public, general public within EPZ or surrounding EPZ communities, customers, shareholders, and retirees.

The recommendations in this section of the report are summarized in Table 6.1 at the end of this section.

I. General Public

Background/Findings

The public received mixed messages about the levels of risk involved. The role of the counties in "preparing for the worst" was not understood.

RECOMMENDATION:

- 6.1 Explain the role of the counties in news releases and news briefings. Furthermore, use non-technical language in the news releases and briefings so that a layperson can understand what is being said.

II. General Public Within EPZ or Surrounding EPZ Communities

Background/Findings

Five concerns were identified:

- Throughout the EPZ, rumors conveyed an image of an "out of control" condition at the plant and of an "impending evacuation."
- Too little manpower/too few phones to handle the volume of calls that the public placed to rumor control at the county courthouses.
- Conflict in Blue Pages of phone book -- siren system is called "Alert Notification System" which caused confusion over why sirens were not sounded during the Feb. 3 Alert.
- Drills give impression that an emergency always escalates and that the only way to respond to a nuclear emergency is through evacuation.
- Confusion over what the sounding of sirens signals. Sirens have two tones -- warbling and steady. The steady tone is used for a nuclear emergency. Its sounding means to turn to the Emergency Broadcast System, not to evacuate.

RECOMMENDATIONS:

- 6.2 Provide the necessary equipment to expand the Luzerne and Columbia counties' rumor control capabilities.

Rationale: Both counties currently have inadequate rumor control capabilities, both in terms of number of lines and personnel available to man the lines. Rumor control is a vital component during an emergency. The inability to answer questions or reassure feeds rumors. During the February 3 Alerts, many callers received busy signals and their fears could not be allayed.

- 6.3 Improve the Emergency Information brochure that is mailed out to citizens of Luzerne and Columbia counties along with the Blue Pages in the phone books.

Explain the role of the counties during an emergency.

More clearly define the four levels of emergencies (especially the distinction between site and general emergency).

Explain that emergencies do not necessarily escalate from one level to another and that to come out of an emergency, one does not have to pass through a lower emergency classification.

Stress that a sounding of sirens means to turn to the Emergency Broadcast System -- not to evacuate.

Change references to the siren system in the Blue Pages from "Alert Signal" to "Siren". If possible, the name of the siren system should be changed to remove the word "Alert" from the title. Consideration should be given to returning to its original name, Public Notification System (PNS). Make the necessary changes to the Emergency Information brochure and Blue Pages.

6.4 Material for various media should be put together to enhance public knowledge within the EPZ.

Emergency Planning should update and expand utilization of its slide show/presentation/speech on the emergency plan. It would be available for the County EMA Directors. If desired, the County EMA Directors could then use it to educate public groups (Kiwanis, Rotary, etc.). Its availability should also be advertised to the general public. Then Emergency Planning could present it to interested members of the Public.

Speakers Bureau Program should consider the Emergency Plan as one of its topics.

Emergency Planning should investigate airing a program on PBS or on local cable TV (in the EPZ).

III. Customers

Background/Findings

There does not appear to be any need to specifically notify customers about an emergency. If an emergency turned out to be very serious, then communications with customers may be warranted. This post-event communication would be at the discretion of the Marketing Department.

It should also be noted that large customers near the plant would not call the Media Operations Center nor the Customer Contact Center, if they had questions but rather their I&C consultants.

RECOMMENDATION:

6.5 The M&ED Managers for Susquehanna and Central Divisions should inform their I&C consultants during office hours about any SSES emergencies. In addition, the I&C consultants could aid in Rumor Control by feeding back any rumors they hear from their customers to the PIM.

IV. Shareholders

Background/Findings

During an emergency Corporate Communications releases information to the Financial Newswires. In addition, Corporate Communications notifies Executive VP and Chief Financial Officer.

The expansion of the 800 Investor phone line (with a pre-recorded message with the latest news release) was considered in order to handle a potential flood of calls on that line by worried investors. However, the Financial Department indicated in a discussion that notification of the Chief Financial Officer and the Financial Newswires was sufficient.

RECOMMENDATION:

- 6.6 Include an article explaining the emergency in the Shareholders' newsletter.

V. Retirees

Background/Findings

During an emergency there does not appear to be any special informational needs for retirees beyond what the general public requires.

RECOMMENDATION:

- 6.7 Include an article explaining the emergency in the retirees' newsletter "Best Years."

TABLE 6.1
SUMMARY OF RECOMMENDATIONS
GENERAL PUBLIC

Target Audience	Method of Notification	Notified by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
General Public within or near EPZ	News Briefings & news releases (Radio, TV, Newspaper)	Media (via briefings by PIM & news release by Corp. Comm.)	Triggered by Corp. Comm. news release and briefings by PIM	What has occurred Role of counties What public actions required Use non-technical language. (Also improve Emergency Info brochure and Blue Pages in Phone Book to clear up confusion over emergency classifications and siren system)	Whenever change in Plant status or when Corp. Comm. issues update or PIM holds briefing
Customers	None	NA	NA	NA	NA
Large Customers within or near EPZ	None	NA	NA	These large customers would contact their I&C consultants if they had questions/concerns	

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
General Public within or near EPZ		Expand phone systems of counties' rumor control to handle volume of calls generated by emergency		Put together material for various media to enhance public knowledge within EPZ: <ul style="list-style-type: none"> Speakers Bureau Program should consider E-Plan as a topic Investigate airing program on E-Plan on local PBS or cable TV Update & expand utiliza- tion of presentations for County EMA directors to give to local groups on E-Plan 	Final news release will indicate event has terminated
Customers	NA	NA	NA	NA	If a very serious incident occurred, then follow-up conversations with customers may be warranted. This would at the discretion of the Marketing Dept.
Large Customers within or near EPZ	M&ED Managers for Susquehanna & Central divisions should inform their I&C consultants during the workday about any emergency	NA	NA	Train I&C consultants to feed any rumors they hear from customers to PIM	

Target Audience	Method of Notification	Notified. by Whom	Speed of Notification	Informational Needs/Message Content	Updates/Frequency
Share-holders	Via media	Corp. Communications releases info to the Financial Newswires.	Triggered by Corp. Communications news releases.	Message based on latest news releases	Whenever a news release is issued, message is updated
Retirees	None	NA	NA	NA	NA
General Public	News briefing & news releases (via Radio, TV & Newspapers)	Media (via briefings by PIM and news releases by Corp. Communications)	Triggered by Corp. Comm. news releases & briefings by PIM	What has occurred Role of counties What public actions required Use non-technical language	Whenever change in plant status or when Corp. Comm. issues update or PIM holds briefing

	Procedural Changes	Technology Requirements	Communication Drills Required	On-going Training	Post Communication Closeout
Share- holders			Executive VP and CFO should be notified during drills		Final news release will indicate event has terminated Article in Shareholders' newsletter explaining incident
Retirees	NA	NA	NA	NA	Article in retiree's newsletter "Best Years"
General Public		Ensure Counties' Rumor Control & PP&L's Customer Contact Center can adequately handle public calls that may be generated by an emergency	Customer Contact Center should participate in drills		Final news release will indicate event has terminated