



Federal Emergency Management Agency

Region III

Liberty Square Building (Second Floor)
105 South Seventh Street
Philadelphia, PA 19106

PT

NOV 7 1997

Mr. Hubert J. Miller
Regional Administrator
U.S. Nuclear Regulatory Commission – Region I
King of Prussia, Pennsylvania 19406

Dear Mr. Miller:

The purpose of this letter is to officially inform you of the Federal Emergency Management Agency's (FEMA) identification of two Deficiencies that occurred during the Susquehanna Steam Electric Station (SSES) Radiological Emergency Preparedness (REP) Exercise conducted on October 28, 1997.

A Deficiency is being assessed against Columbia County Emergency Operations Center (EOC) under Objective 10; Alert and Notification (A&N). The Deficiency resulted because of the county EOC staff's failure to satisfactorily alert and notify the public within the 10-mile plume pathway emergency planning zone and disseminate instructional messages to the public on the basis of decisions by appropriate State officials. The first alert and notification (A&N) sequence was not completed within the required 15 minutes.. The elapsed time between the decision to activate the initial A&N sequence and the broadcast of the EAS message was 21 minutes. Remedial action was subsequently demonstrated during the second A&N sequence at the Columbia County EOC. The decision to activate the second A&N sequence was made at 2021 and broadcast of the simulated EAS message began at 2034. The elapsed time was 13 minutes.

The second Deficiency is being assessed against Nescopeck Borough Emergency Operations Center (EOC) in Luzerne County under the following objectives:

- Objective 1 Mobilization of Emergency Personnel
- Objective 2 Facilities - Equipment, Displays, and Work Environment
- Objective 3 Direction and Control
- Objective 5 Emergency Worker Exposure Control
- Objective 15 Implementation of Protective Actions - Special Populations
- Objective 17 Traffic and Access Control
- Objective 30 Continuous, 24-Hour Staffing

The Deficiency resulted because of the cumulative effects of the borough EOC staff's failure to satisfactorily accomplish the following:

1. Provide maximum protection of the Borough's residence and transient populations located within the plume EPZ of SSES, in the event of a radiological incident at the plant. For example: The borough plan's *Notification and Resource Manual* states that six individuals will be mobilized to fill eight functions (two functions are combined). Two individuals; Police Services and Public Works did not mobilize. The police officer on duty at the time of the exercise remained for a time after the Alert to assist, but left by 1930, and the Medical/Transportation Officer left at 2015 and was not replaced. Other individuals who arrived were asked to fill the vacant positions but, lacking knowledge and training, could not do so adequately. As a result, two key positions were unstaffed when the evacuation was ordered. Police did not staff TCPs, and Transportation/Medical did not meet the needs of special populations.

2. Provide the facilities, equipment, displays, and other materials necessary to support the EOC's emergency operations in accordance with the borough plan. For example: The Emergency Classification Level display for the Site Area Emergency was updated approximately 41 minutes after the message was received and contributed to a delay in staff members' completed required actions such as assuring that an individual was available for traffic control functions and directing ambulances to residents requiring ambulance assistance (page F-6 of the plan). Access to the facility was not controlled resulting in extraneous individuals entering the EOC who did not sign the sign-in-sheet. Weather information – particularly wind direction – was not displayed and no note was taken of the wind shift toward Nescopeck.

3. Provide the level of direction and control necessary to allow the EOC staff to carry out the essential operations for which the EOC is responsible in accordance with the borough plan. For example: Notify Luzerne County EMA that the EOC is operational; review EOC Standard Operating Procedures and EMC responsibilities; establish EOC security; brief EOC staff on the situation and status; ensure that status boards are current. Ensure that elected officials and EOC staff are aware of the SAE classification; check to ensure that all required actions are being taken. Review checklists to ensure actions are underway or complete; ensure that non-English speaking and hearing impaired people are notified of protection actions; review evacuation routes with Police officer and determine if roads are clear; ensure Police have established traffic control points; ensure that Transportation Officer has dispatched vehicles to pick up transportation-dependent people; ensure preparation to relocate the municipal government and EOC; and assemble the EOC staff and brief on the situation. In addition, only four EOC personnel kept logs; information recorded was limited only to recording incoming messages from the County EMA. No record was kept of messages to the County or of internal messages.

4. Protect emergency workers from radiation exposure and implement potassium iodide protective actions for emergency workers in accordance with the borough plan. For example: A radiological area kit was not assembled for the EOC in accordance with page I-22 of the borough plan. Route alerting team members did not demonstrate an ability to read their direct-reading dosimeters.

5. Provide the transportation resources necessary to implement the evacuation protective action for special populations in accordance with the borough plan. For example: The list of people with special needs was out of date; one or more individuals had died or moved away and at least one non-English speaking family had moved into the Borough. No one knew how the list was prepared nor how it was updated. There are two ambulances in the Borough, adequate to transport the two known handicapped people; however, ambulance drivers were not contacted. The need for two wheelchair vans or ambulances was reported to the County (per Plan), the municipality took no follow up actions to ensure that the vehicles had been dispatched.

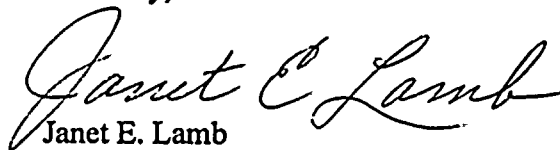
6. Establish municipal traffic control points to control evacuation traffic in accordance with the borough plan. The traffic control point, post #1, at Broad and Third Streets, was not established because no Police officer was mobilized.

7. Ensure the capability to staff the Emergency Operations Center on a continuous 24-hour basis. No shift change at Nescopeck Borough EOC was demonstrated as required by the exercise extent of play agreement.

As required by 44 CFR 350.9(d) and FEMA-REP-14, the staff thoroughly reviewed and discussed this issue with FEMA Headquarters and FEMA Region III's Regional Assistance Committee. Because of the potential impact of a Deficiency on the protection of the public health and safety, we informed the Commonwealth of Pennsylvania that appropriate remedial actions, including remedial exercises, drills, or other actions for the Deficiency assessed against the Nescopeck Borough EOC should be conducted within 120 days.

If you have any questions or comments, please contact me or Nelson Wiles, Project Officer, at (215) 931-5656.

Sincerely,



Janet E. Lamb
Regional Assistance Committee
Chairperson