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April 19, 1995

Florida Power and Light Company  
ATTN: Mr. J. H. Goldberg  
President - Nuclear Division  
P. O. Box 14000  
Juno Beach, FL 33408-0420

SUBJECT: FEMA LETTER FOR THE MARCH 22, 1995 TURKEY POINT EXERCISE

Gentlemen:

Enclosed is the FEMA letter to the State of Florida dated April 12, 1995, identifying a deficiency involving the public alert and notification system activation process in Dade County. Because of this deficiency a remedial exercise is required to be held within a 120 days of the exercise date and no later than July 21, 1995.

We encourage you to work closely with the State in resolving this deficiency. If you have any questions, please contact K. P. Barr at 404-331-0335.

Sincerely,

ORIGINAL SIGNED BY  
WILLIAM E. CLINE

William E. Cline, Chief  
Radiological Protection and  
Emergency Preparedness Branch  
Division of Radiation Safety  
and Safeguards

Docket Nos. 50-250, 50-251  
License Nos. DPR-31, DPR-41

Enclosure: FEMA Letter Dtd 4/12/95

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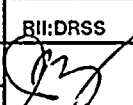

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# Federal Emergency Management Agency

Region IV

1371 Peachtree Street, NE, Suite 700  
Atlanta, GA 30309

R4-PT-TEE

April 12, 1995

Joseph F. Myers, Director  
Division of Emergency Management  
2740 Centerview Drive  
Tallahassee, Florida 32399

Dear Mr. Myers:

The evaluation of the March 22, 1995, Turkey Point Nuclear Power Plant exercise identified a deficiency involving the public alert and notification system activation process in Dade County. This Deficiency was compounded by the failure to fully coordinate protective action decisions among the key State and local decision makers at the utility's Emergency Operating Facility (EOF). As a result, a remedial exercise is required within 120 days of the exercise but not later than July 21, 1995.

The FEMA Radiological Emergency Preparedness (REP) Exercise Manual (FEMA-REP-14), September 1991, defines a Deficiency as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant. It further states, under Objective 10, that failure by responsible off-site response organizations (OROs) to complete the initial alert and notification sequence within 15 minutes will result in the identification of a Deficiency. Objective 11 addresses the processes by which the contents of notification messages are coordinated among the off-site response organizations and the clarity, completeness, and accuracy of message content.

The following Deficiency has been identified for Dade County under REP Objective 10, FEMA REP-14 (NUREG 0654/FEMA REP-1, REV. 1., reference is provided in parentheses at the conclusion of the description).

At 11:33 a.m., a Site Area Emergency (SAE) was declared by the utility operator. The notification from the utility included no protective action recommendations. At 12:17 p.m., the Dade County Emergency Operations Center was informed of the Protective Action



Decision to activate the alert and notification system and to establish a marine exclusion area within five miles of the plant. This decision was conveyed from the EOF by Dade county officials for action by the Metro-Dade County EOC and constituted the initial timed sequence of alert and notification system activation. The Emergency Broadcast System (EBS) message advised that the Turkey Point Nuclear Power Plant was under a SAE, that boat traffic within a 5-mile perimeter of the plant had been diverted, and notified marine interests to monitor channel 16. The message was broadcast at 12:40 p.m. The execution of the alert and notification process took 23 minutes. (E.6)

The above-mentioned actions, although discussed during a joint briefing chaired by the utility at the EOF, were not jointly decided on by Dade County, Monroe County, and State decision makers at the EOF.

Additionally, at the General Emergency, a joint decision was reached which called for the evacuation Zones 2 and 4 in Dade County and the establishment of a 10-mile marine exclusion area. The Dade County EBS message subsequently provided to the public included the evacuation of Zones 2 and 4 but only specified a 2-mile marine exclusion area, and included in-place sheltering all other zones in the 10-mile EPZ.

The precautionary actions excluding boat traffic within 5 miles of the plant and advising marine interests to monitor channel 16 taken unilaterally by Dade County at the SAE and the recommendation at the General Emergency to shelter all zones not evacuated which was added to the EBS message were acceptable, conservative actions. The issue is not the prudence of the actions which were recommended, but the collective decision process which enabled additional, uncoordinated actions to be taken. The failure to fully provide all important actions and information to all the decision makers raises concerns about the potential impact if this is not corrected.

It is therefore recommended that, as discussed on March 29, 1995, between Dade County, Monroe County, Florida Power & Light Company, and State Representatives, and FEMA staff at the National REP Conference, the following remedial actions be undertaken:

All plan or procedural changes required to correct the noted Deficiency will be submitted to the FEMA Region IV office within 120 days of the exercise but not later than June 22, 1995.

A remedial drill addressing both Objectives 10 and 11 will be conducted within 120 days of the exercise but not later than June 22, 1995.

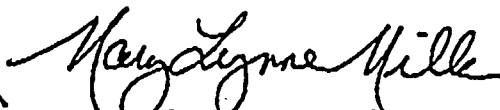
Florida Power and Light Company will prepare a scenario to support this demonstration and provide a utility representative to serve as their Recovery Manager for interaction with the decision making cell.

Demonstration Criterion 1 for Objective 10: Primary Alert and Notification, FEMA REP-14 (pages D.10-1 through D.10-4), will apply to the conduct of the remedial drill.

We suggest that the procedures for the decision makers be modified to include the recording and concurrence of all decisions made by the group. We also recommend that the message development process include a verification that the message contains clear instructions to the public and clearly reflects the precise protective action decision(s) and that all EBS messages contain mastheads clearly indicating the origin, date, and time of release.

Should you have questions, please contact Conrad Burnside at 404/853-4486.

Sincerely,

  
for  
Kenneth D. Hutchison  
Regional Director