NUREG/CP-0009

Proceedings of the U.S. Nuclear Regulatory Commission

Conference on Radiological Emergency Preparedness Training

Held at
Kansas City, Missouri
July 24 - 25, 1979

Office of
State Programs

U.S. Nuclear Regulatory
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Office of State Programs
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 26, 1979

NOTE TO: SEMINAR PARTICIPANTS AND OBSERVERS:

The NRC is committed to cooperating with other Federal agencies on working with State and local governments to improve their radiological emergency response capabilities.

This training conference has demonstrated the type of cooperative spirit that is necessary for us to accomplish the tasks that lay before us.

I want to personally thank each of you for your thoughts and suggestions at the conference.

Sincerely,

Robert G. Ryan, Director
Office of State Programs

1373 111

ABSTRACT

On July 24-25, 1979, the Nuclear Regulatory Commission sponsored a training seminar for Federal officials involved in the review of State and local radiological emergency response plans. The major purpose of the seminar was to discuss the methods used to review the State response plans for accidents involving radioactive materials. The review criteria, as revised, are found in Appendix E.

TABLE OF CONTENTS

1373 113

INTRODUCTION

As a result of the accident at Three Mile Island (TMI) Unit 2 in March 1979, the program of improving State and local radiological emergency response plans (RERP) is receiving substantial attention. The increased interest on this issue has centered on the preparedness of the State and local governments to respond effectively to an accident in order to properly protect public health and safety.

The Federal Register Notice of December 24, 1975 published by the Federal Preparedness Agency describes the responsibilities and assignments of Federal agencies in the field and outlines a program that includes training, technical assistance, guidance, response plan review and concurrence, and response plan tests and exercises. The Nuclear Regulatory Commission (NRC) was assigned lead agency responsibility for review and concurrence in State and local plans for dealing with radiological emergencies. The Register Notice is presented as Appendix A.

On July 20, 1979, President Carter signed an executive order which merged the Federal Preparedness Agency (GSA), the Defense Civil Preparedness Agency (DOD), and the Federal Disaster Assistance Administration (HUD) into a new agency, the Federal Emergency Management Agency (FEMA); and on August 1, 1979, Mr. John Macy was sworn in as FEMA's first Director. It is likely that the December 24, 1975 Federal Register Notice will be revised and updated in the immediate future to reflect FEMA's role as the single agency in the Federal government responsible for policy matters and coordination in emergency planning and response. The program for Federal interaction with states on their RERP's will change to reflect FEMA's new role, and further changes can be expected soon both because of legislation now pending in the Congress and as a result of forthcoming recommendations from various investigations and assessments of the TMI accident.

THE CONCURRENCE PROCESS AS IT WORKS TODAY

The initial review of State and local Radiological Emergency Response Plans is conducted by a Regional Advisory Committee (RAC), composed of regional representatives of the Environmental Protection Agency (EPA), Department of Transportation (DOT), Department of Energy (DOE), Department of Health, Education and Welfare (HEW), Federal Emergency Management Agency (formerly DCPA, FDAA and FPA), and NRC. The reviewers use NUREG-75/111 (including Supplement No. 1)* as a standard to measure whether or not a State or local government is adequately addressing each of the 10 essential planning elements. Based on the review by each of the individual members, the RAC makes a recommendation to NRC on whether a plan is adequate to receive concurrence from NRC. To date the States of Alabama, Arkansas, California, Connecticut, Delaware, Florida, Iowa, Kansas, New Jersey, New York, South Carolina and Washington have concurrences in plans. (Note: Nebraska also received concurrence relative to the Fort Calhoun station on September 21, 1979 and the Virginia plan received a concurrence in October 1979.)

The RACs' continuing efforts in critiquing tests and exercises is critical to assuring State and local preparedness. Satisfactory field exercises of the plan must be conducted annually for a State to maintain concurrence.

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* U.S. Nuclear Regulatory Commission, NUREG-75/111 (12-1-74); Supplement No. 1 (3-15-77); Guide and Checklist for Development and Evaluation of State and Local Government Radiological Emergency Response Plans in Support of Fixed Nuclear Facilities. Available at the Nuclear Regulatory Commission.

A plan after all is a piece of paper; only an exercise will show whether or not it can really be expected to work in an emergency.

Because of the key roles played by the RAC's and their headquarters counterparts, The NRC sponsored a training conference in radiological emergency preparedness in Kansas City, Missouri on July 24-25, 1979. Representatives of all of the RACs and their headquarters counterparts were present to discuss the methods used to review Stateand local emergency response plans for accidents involving radioactive materials. The letters of invitation are found in Appendix B and the list of participants in Appendix C.

Representatives of the Interorganizational Advisory Committee (IOAC) of the Conference of Radiation Control of Program Directors (CRCPD) also participated. They were: Aubrey Godwin, Alabama; Betty McClelland, Washington; and Howard Proctor, Decatur county, Alabama. During the meeting there were formal presentatiions on a variety of subjects relating to emergency preparedness. A copy of the agenda and reference material is included as Appendix D.

In addition to the formal plenary session, time was allotted for each agency and each RAC to meet separately to discuss draft criteria for reviewing a State RERP. An important aspect of this conference was to attempt to get some uniformity in the quality and depth of reviews by all of the RACs. Each RAC has heretofore operated independently, using its own judgment on criteria. This has resulted in some unevenness in the review of State plans. By applying the same review criteria nationally, we hope to improve the capabilities of the States to respond effectively to an emergency at a fixed nuclear facility. The review criteria, revised by the comments and recommendations received from the participants, are found in Appendix E.

At the closing plenary session on July 25, 1979, all of the issues raised in the individual agency and RAC meetings were discussed. The body of this report is a synopsis of this session.

The participants, by show of hands, generally agreed with the review criteria proposed. A big issue, however, was the perceived lack of support of the RACs by headquarters agencies. NRC, as lead agency, agreed to discuss this with the Director of the Federal Emergency Management Agency (FEMA) and the other involved Federal agencies in order to make them aware of the situation and seek support for providing the necessary resources for this program in the field. Chairman Hendrie of NRC wrote to each member agency asking for a renewal of the RAC commitments and to stress the tight deadlines suggested in the version of the FY 80 NRC authorization bill passed by the Senate (S. 562). Chairman Hendrie's letter to Douglas Costle, Administrator of the U.S. Environmental Protection Agency, is found at Appendix E.

SYNOPSIS OF DISCUSSION OF
July 25, 1979

PLANNING GUIDANCE - REVIEW CRITERIA - CONCURRENCE

Emergency Preparedness for Other Facilities

A number of points were made with respect to emergency planning for DOE and Department of Defense (DOD) facilities. The General Accounting Office (GAO) in its review of emergency planning* suggested that DOE should upgrade its emergency planning posture and involve State and local governments in the planning process. Both DOE and DOD generally accepted these recommendations.

While the current NRC emergency planning program with the State and local governments is structured to deal only with licensed reactors, where the operator is required to have a plan, we should be looking towards inclusion of other licensed facilities in State and local government planning.

Model Plans

Representatives of DCPA (now part of FEMA) suggested that Model Radiological Emergency Response Plans might be prepared for use by State and local governments. NRC opposed the notion of model plans because of previous experience. A number of years ago, model emergency plans were published for use by State and local governments. The experience indicates that once the blanks in the model plan were filled in, the plan went on the shelf, never to be looked at again or understood by those who had a response role.

A suggestion for a better approach is to use the current guidance and, when a plan receives concurrence, make that plan available as an example of how one State did its planning. An extension of the approach is to put together a "library" of particularly well drawn elements from various concurred State plans.

It was generally accepted that, during the development of a plan, those who are responsible for responding will have a better understanding of their role and the scope of their responsibility if they have the experience of actually writing the plan. FEMA plans to continue work on a model plan, taking these pitfalls into account.

Continued Concurrence

As part of the criteria for maintaining continued concurrence, a State must exercise its plan annually. Although a grace period may be allowed for extenuating circumstances, NRC is prepared to withdraw its concurrence of a State plan if it is not exercised at least annually.

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*Report to the Congress by the Comptroller General of the United States: Areas Around Nuclear Facilities Should Be Better Prepared for Radiological Emergencies, March 30, 1979.

Current Method of RAC Evaluation

Discussion on how the RAC's evaluate a State plan raised a question as to whether or not to keep the current system of four possible evaluations for any one plan element or to reduce it to only two i.e., either acceptable or unacceptable.

This issue was put to a vote and the participants decided to keep the evaluation system as it is.

State and Local Plans Prepared by Contractors

It should make little difference in the quality of the plan whether it is prepared by State individuals or by a contractor. It is important, however, that all of the parties with responsibilities under the plan know and understand their roles and scope of responsibility, and this is usually easier if State and local officials actually draft the plan.

Role of DOT

Currently very little is being done in RERP's for transportation accidents. DOT is involved in the RAC's and the Headquarters Advisory Committee (HAC), but little guidance has been provided to the States on this issue.

NRC and DOT, as well as the other involved Federal agencies, are aware of this, and it is an issue that needs work. DOT and NRC, along with EPA and the States, will be working together to improve the guidance on transportation accidents involving radioactive materials. A task force approach is preferred.

Administrative Standards

When a State plan is sent out by NRC for review to other Federal agencies, there needs to be greater specificity on what the documents contain and as to the status of the plan (Revision? new draft? old document? etc.) Also all reference material cited in the plan should be made available to the reviewers, along with a cross check chart (developed by the state) indicating where each of the elements of the Guide and Checklist (NUREG-75/111, Supp. No. 1) is dealt with in the plan.

When a plan is reviewed by a RAC, written comments should be provided to the State by the RAC. Good documentation and records of meetings and formal plan reviews should be maintained by each RAC. States should be asked to index plans and supporting documents.

Site Specific Plans

State plans should be site specific and should include detailed planning for the locality contiguous to a licensed facility. Each site should be dealt with separately in the overall State plan.

While NRC has concurred in State plans where little information in county planning has been included, NRC will not continue that practice. Conditional concurrence may be granted, however, to allow the State and county a specified time to upgrade local planning. This appears compatible with the Senate language in S.562.

1373 117

Review Criteria

The review criteria for evaluating State and local RERP's were discussed at great length during individual RAC and agency meetings. Specific comments and recommendations were included in the revised version included as Appendix E of this report.

The participants agreed that, in order to minimize the unevenness of State plans, review criteria, applied nationally, are necessary. By a show of hands, the participants agreed that, with minor modifications, the criteria are useful and can be used by all of the RACs in reviewing State plans.

Guide and Checklist (NUREG-75/111)

There was general agreement that NUREG-75/111 (including Supplement No. 1) was an excellent document. While not perfect, it does provide a useful framework for State and local governments to use in devising a plan.

The participants recognized the document needs some revision which should take the form of perfecting a good piece of business without tampering its basic fibre. Additional elements should probably be included in future editions, drawn from the "recommended" list in the 1975 Guide and Checklist.

All 154 elements should be considered in the review of State plans, but RACs should concentrate their efforts on reviewing the 70 essential elements required for concurrence.

Siting of Nuclear Facilities

Heavily Populated Areas

States with concurrence already will be faced serious problems with sites in or near heavily populated areas where a new facility is proposed or where an existing site may add new units. NRC must address this in its siting policy now undergoing revision. The suggestions were made that the NRC convene a group of regulatory Federal officials to provide input to NRC siting policy and that NRC should include emergency planning in developing its siting policy. Extraordinary measures may have to be taken at existing sites located near large population centers. Emergency preparedness at such sites must be given the highest priority.

Drills and Exercises

Testing Plans

The group agreed that testing the plans is extremely important. If a State does not conduct an annual exercise, NRC should lift concurrence on the recommendation of the RAC.

Subcontracting

Should Federal agencies consider using contractors in exercises and critiques to ease the burden for RAC members? NRC replied that it was a possibility for the long run, but not feasible or desirable for the immediate future.

1373 118

Unacceptable Exercises

If an exercise were deemed unacceptable by the RAC, NRC should demand correction of the deficiencies by the State. If the State refused to make the necessary improvements, NRC should lift the concurrence.

Radiological Assistance Program Team Participation

The DOE Radiological Assistance Program (RAP) cannot participate in all State exercises. A DOE spokesman noted that RAP personnel usually can participate in communications drills. The group consensus was that at least some of the people from the RAP should be involved in every exercise. And more than that, the RAP should participate in at least one exercise a year to test its capabilities.

Training

General

There was a call for more training for State and local government personnel and the regional RAC's. NRC funds a course at the Nevada Test site in radiological emergency response operations. Five slots in each course are open for Federal observers. These are normally filled by Headquarters or RAC members. For the long haul, NRC and FEMA might consider some certification program for State and local officials.

Regional Training

Several RAC's commented that they need coordinators and decision makers courses. New RAC members should receive some training before they become heavily involved. One comment was that the RAC from a specific region should attend the same course together. NRC agreed to pursue this idea.

Public Education

There was a suggestion that either NRC or FEMA should educate the public on the relative hazards of radiation. NRC policy is not to get involved because it may appear to be promotional. FEMA does not presently see this sort of education as a high priority item.

RAC Role, Membership

Role of RACs

The role of the regional RAC is to be advisor, reviewer and observer to the State. Their role is not operational for a real emergency, although RAC members might participate in the Federal supportive response via FEMA.

Manpower

Most RACs complained that they lacked support from the various headquarters supporting agencies. If Congress passes legislation relating to emergency planning, the agencies should not have trouble making commitments to this program. In the meantime, RAC VI offered a plan to pick up some of the increased work from the other regions. NRC was urged to write strong letters to the agency heads requesting manpower and travel mon (See Appendix F.)

1373 119

Role of FEMA

DCPA, FDAA, and FPA are now part of FEMA. The RAC members from these former agencies will now be FEMA members. The role of the regional FEMA director is a strong one. If he decides that there should be more than one representative to the RAC, then there will be.

Concurrence Schedule

The RAC's are concerned that the concurrence schedule set by NRC can't be met. Quarterly schedules will be started at once for the RAC efforts.

Transportation Accidents

There were suggestions from the floor that DOT has not been involved significantly in the planning process. Also, the authorization bill (S.562) does not talk about transportation accident response. Should the RACs deal with transportation accidents? For now, it probably does not need major emphasis, but one can count on it needing attention in the near future. It is an area of major concern and cannot be neglected.

Miscellaneous

Funding Study

All participants encouraged continued efforts on the funding study Beyond Defense in Depth - NUREG-0553.

Federal Plan

There is need for a Federal emergency response plan which might be tested along with the State plan. One problem is the lack of a singular attitude within the Federal agencies. HEW's Emergency Medical Services stresses an ad hoc approach and centralization for effectiveness. If enacted, S.562 would require FEMA to devise a National Contingency Plan for dealing with radiological emergencies.

State Point of Contact

Who should the States talk to? The National Contingency Plan which FEMA is working on should provide clear answers for this essential question of responsibility and coordination.

1373 120

Vol. 40—No. 248
12-24-75

Appendix A

federal register

WEDNESDAY, DECEMBER 24, 1975

RADIOLOGICAL EMERGENCIES
GSA outlines responsibilities of various Federal agencies for planning for incidents involving radioactive materials 59494

GENERAL SERVICES ADMINISTRATION

Federal Preparedness Agency

RADIOLOGICAL INCIDENT EMERGENCY RESPONSE PLANNING; FIXED FACILITIES AND TRANSPORTATION

Interagency Responsibilities

This notice is issued by the Federal Preparedness Agency, General Services Administration (GSA), to provide full public information concerning the general course and method by which certain radiological incident emergency response planning responsibilities are channeled and determined (5 USC 552(a)(1)(B)). It supersedes the FEDERAL REGISTER notice of January 24, 1973 (38 FR 2356), published by the Office of Emergency Preparedness.

Purpose. To state the responsibilities as agreed between certain Federal agencies for radiological emergency response planning covering fixed nuclear facilities and transportation incidents involving radioactive materials and for providing coordinated Federal assistance to State and local governments in their emergency response planning related to such incidents. Policy and planning guidance to Federal agencies for assistance to States will be directed toward those incidents whose effects extend beyond the boundaries of the facility or site or the immediate area of an incident involving the transportation of radioactive material. It is intended that the plans and arrangements developed by Federal agencies and by the States for responding to the contingencies set forth in this notice will be encompassed subsequently in Federal and State planning documents which provide for the full spectrum of peacetime nuclear emergencies. It is also intended that this Statement of Responsibilities will provide a continuing stimulus to State and local government emergency planning for responding to radiological incidents.

Background--Formal statement of the roles of the Federal departments and agencies, as set forth in this notice, is made pursuant to Executive Orders 11051 and 11490 and in connection with the responsibility of the Federal Preparedness Agency to stimulate vigorous State and local participation in emergency preparedness measures and in achieving a coordinated working relationship between the various elements of State governments and the Federal agencies to which specific emergency preparedness functions have been assigned. While there is substantial assurance of an exceedingly low probability of incidents involving radioactive materials in fixed nuclear facilities and in the transportation of those materials, the anticipated proliferation of nuclear power plants and materials in the near future requires early consideration of this problem and adequate emergency planning for such contingencies. At the Federal level, several agencies are cooperating to lend assistance to State and local governments in developing emergency plans for fixed nuclear facilities and the transportation of nuclear materials. Current planning activities are taking place at all levels of government, as well as in private industry.

Responsibilities. The Nuclear Regulatory Commission (NRC) is the lead agency in radiological incident emergency response planning, training and other assistance activities covered in this notice. The Federal Preparedness Agency, GSA, exercises general monitorship of these activities. Responsibilities of NRC, the Federal Preparedness Agency, GSA, and other Federal agencies are detailed below.

The Nuclear Regulatory Commission (NRC) is responsible for:

1. Issuance of guidance to other Federal agencies concerning their responsibilities and authorities in radiological incident emergency response planning and in providing planning assistance to State and local governments.

2. Development and promulgation of guidance to State and local governments in coordination with other Federal agencies for the preparation of radiological emergency response plans.

3. Review and concurrence in such plans. (Proper correlation among State, local government, licensee, and national plans is an element of this review.)

4. Determination of the accident potential at each licensed fixed nuclear facility.

5. Issuance of guidance for establishment of effective systems of emergency radiation detection and measurement.

The Environmental Protection Agency (EPA) is responsible for:

1. Establishment of Protection Action Guides (PAG) in coordination with appropriate Federal agencies. These guides will be in terms of projected radiation doses which might result from radiological incidents at fixed nuclear facilities or in the transportation of radioactive materials.

2. Recommendations as to appropriate protective actions which can be taken by governmental authorities to ameliorate the consequences of a radiological incident at a fixed nuclear facility or from an incident involving transportation of radioactive materials.

3. Providing assistance, following the guidance issued by NRC, to State agencies with radiological emergency response responsibilities in the development of their emergency plans relative to nuclear facilities and transportation incidents involving radioactive materials.

4. The establishment of emergency radiation detection and measurement systems guidelines in cooperation with NRC.

The Energy Research and Development Administration (ERDA) is responsible for:

1. Providing guidance, consistent with NRC guidance, to State and local governments on the development of that portion of their radiological incident emergency response planning which is related to ERDA-managed and operated facilities and ERDA-controlled radioactive materials in transit to assure that: (a) State and local planning are coordinated with ERDA and ERDA contractor radiological incident response planning, and (b) State and local response capabilities and resources are fully coordinated with ERDA to mitigate the offsite consequences of radiological incidents.

2. Cooperation with the involved Federal agencies in the development and implementation of radiological emergency response planning assistance for State and local governments, consistent with NRC guidance.

3. Determination of the accident potential at each non-licensed ERDA fixed nuclear facility.

4. Assisting other agencies in the development and establishment of guidelines on effective systems of emergency radiation detection and measurement, including instrumentation, for State and local governments, in cooperation with NRC.

The Department of Health, Education, and Welfare (DHEW) is responsible for:

1. Assisting State health departments, State hospital associations, and other professional organizations and ambulance services in the development of plans for the prevention of adverse effects from exposure to radiation, including the use of prophylactic drugs to reduce radiation dose to specific organs. This includes health and medical care responses to radiological incidents, consistent with guidelines issued by NRC.

2. Issuance of guidance on appropriate planning actions necessary for evaluating and preventing radioactive contamination of foods and animal feeds, and the control and use of such products should they become contaminated.

3. Issuance of guidance on emergency radiation doses related to the health and safety of ambulance services, hospital, and other health care personnel, in cooperation with EPA.

4. Establishing and issuing guidelines for radiation detection and measurement systems for use by ambulance services and hospital emergency departments, in cooperation with NRC.

The Department of Transportation (DOT) is responsible for:

1. Providing guidelines, in cooperation with NRC and other Federal agencies, and consistent with NRC guidance, for the development of that portion of State and local emergency plans pertaining to transportation incidents involving radioactive materials as described in the Purpose portion of this statement.

2. Assistance to State and local governments in emergency planning for such transportation incidents.

The Defense Civil Preparedness Agency (DCPA) is responsible for:

1. Assistance to State and local authorities in planning the emergency preparedness actions required to provide the mechanism for coordinating emergency operations in response to radiological incidents, consistent with NRC guidance.

2. Issuance of guidance on the use of civil defense resources including warning, communications, training, and radiological defense emergency response systems.

Federal Disaster Assistance Administration (FDAA) of the Department of Housing and Urban Development is responsible for:

1. Providing guidance to State and local authorities on the disaster preparedness aspects of State emergency planning for fixed nuclear facilities and transportation incidents involving radioactive materials, consistent with NRC guidance, for the preparation of radiological emergency response plans.

2. Recommendations to NRC as to appropriate planning actions necessary for evaluation and review of State and local planning activities developed under this notice.

The Federal Preparedness Agency (FPA), GSA, will exercise general monitorship of Federal radiological emergency response planning and training activities related to this notice. Specifically, FPA responsibilities include:

1. Review and endorsement of NRC guidance to other Federal agencies and NRC guidance and planning assistance to State and local governments.

2. Assistance in resolving Federal interagency or Federal-State problems when necessary to the fulfillment of the responsibilities to Federal agencies in this notice.

3. Encouragement of States to produce plans related to this notice as part of their general State emergency planning.

4. Assistance to NRC, ERDA and DOT in developing priorities, when required, for providing this planning assistance to State and local governments.

5. Facilitating State and local contacts for NRC, ERDA and DOT.

6. Maintaining an overview of planning activities and providing policy and planning guidance when required.

Participating Federal agencies will support the development and conduct of emergency response preparedness programs, to include training, consistent with their respective responsibilities.

Other Federal agencies will be involved in specific instances of radiological incident emergency response planning participation and assistance in accordance with their basic responsibilities and functions. Details of such participation as part of the coordinated Federal effort will be a development of each localized planning activity.

Dated: December 10, 1975.

LESLIE W. BRAY, Jr.,
Director, Federal Preparedness Agency, General Services Administration.

[FR Doc.75-34038 Filed 12-23-75;8:45 am]

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 15 1979

Mr. John W. McConnell
Assistant Director
for Plans and Operations
Defense Civil Preparedness Agency
Washington, D.C. 20301

Dear Mr. McConnell:

As you know, NRC's Office of State Programs is conducting a meeting at the Hilton Airport Plaza Inn (I-29 at N.W. 112 Street in Kansas City, Missouri, (816) 891-8900) on July 24 and 25, 1979 to discuss the methods we use to review State and local emergency response plans for accidents involving radioactive materials. If this meeting is to be successful, we should have all of the members of the Regional Advisory Committees and the Headquarters Advisory Committee present and participating.

I ask that you notify all of your agency's Regional and Headquarters Advisory Committee members about this meeting and strongly encourage their participation as part of the commitment under the Federal Register Notice of December 24, 1975. The NRC has some limited funds to support individual travel and per diem where it is impossible for an agency to support its own participation in the meeting. If support is needed, please call Mrs. Shirley Welch on (301) 492-7210 to make arrangements.

A draft agenda and hotel registration cards are enclosed. A block of rooms has been reserved for July 23 and 24. Please note that the registration cards must be returned to the hotel by July 13, 1979.

I believe that this meeting can be a major element in our program of improving State and local government emergency response activities. Quality reviews that use criteria we can all agree on are critical if we are to assure adequate State and local response to a nuclear accident.

I look forward to meeting with you in Kansas City.

Sincerely,

Robert G. Ryan, Director
Office of State Programs

Enclosures:
As stated.

1373 124

IDENTICAL LETTERS SENT TO:

Mr. Donald Carbone
Disaster Programs Officer
Federal Disaster Assistance Administrtion

Mr. Clarence G. Collins, Director
Department of Transportation

Mr. L. Joe Deal, Assistant Director
for Field Operations
U.S. Department of Energy

Mr. Floyd L. Galpin, Director
U.S. Environmental Protection Agency

Dr. Bernard Shleien, Assistant Director
for Scientific Affairs
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Mr. James Thomas
Federal Preparedness Agency

1373 125

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Radiological Emergency Preparedness Training Seminar

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1373 127

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1373 128

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1373 129

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1373 130

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1373 131

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1373 133

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1373 134

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1373 135

REVISED AGENDA

FOR

NUCLEAR REGULATORY COMMISSION

RADIOLOGICAL EMERGENCY PREPAREDNESS TRAINING CONFERENCE

JULY 24-25, 1979
HILTON AIRPORT PLAZA INN
KANSAS CITY, MISSOURI

July 23 - Monday

7:00 - 9:00 P.M. Registration

July 24 - Tuesday

8:00 A.M. Registration - Litton North

8:30 A.M. Opening Plenary - Litton North

Welcome and Introduction - Robert G. Ryan, NRC

Principals from Federal Agencies

Charles Amato, EPA
L. Joe Deal, DOE
John Gibson, FDAA
John McConnel, DCPA
Bernard Shleien, FDA
John Stapleton, DOT
Jim Thomas, FPA

Status Report - Harold Collins, NRC

- Review of Licensee Plans
- Task Force on Emergency Planning
- Commission Advance Notice of Rulemaking
- NRC/EPA Task Force Recommendations

9:30 A.M. Field Assistance Effort - Harold Gaut, NRC

10:15 - 10:30 A.M. BREAK

10:30 A.M. Discussion - Harold Collins, NRC

- Review of Existing Concurrences - Robert Jaske, NRC

- Status of States with Operating Plants and No Concurrence - Richard Van Niel, NRC
- Status of other States without Concurrence - Richard Cleveland
- Acceptance Criteria - Harold Gaut, NRC

11:30 - 1:00 P.M. LUNCH

1:00 - 3:15 P.M. Federal Agency Meetings (See Attachment 1)

- Review Acceptance Criteria
- Surface and Document Problems (technical and logistical)
- Prepare and Submit written issues for Wednesday Morning panel

3:15 - 3:30 P.M. BREAK

3:30 P.M. Discussion (cont.) - Harold Collins, NRC (Litton North)

- Exercise Scenarios - Richard Starostecki (SAI)
- Review and Critique of Exercises - John Heard (RAC IV)
- Planning vs. Preparedness - Richard Donovan (RAC X)
- Training - Robert DeFayette, NRC
- PRERAD - Jim Dukes, NRC
- Funding Study - Shelly Schwartz, NRC

5:00 - 7:30 P.M. DINNER

7:30 - 9:30 P.M. RAC Meetings (See Attachment 2)

- Review Acceptance Criteria
- Surface and Document Problems
- Outline Plan for Existing Concurrences
- Prepare Floor Questions for Wednesday Morning

1373 137

July 25 - Wednesday

9:00 - 10:30 A.M.	Panel on Issues - Robert Ryan, NRC chairs (Litton North)
10:30 - 10:45 A.M.	BREAK
10:45 - 12:00 P.M.	Closing Statements by Federal Agency Senior Staff

ATTACHMENT 1

1:00 P.M. Federal Agency Work Sessions

Agency	Room No.	NRC Liaison
NRC	109	
EPA	118	R. Van Niel
DOT	119	R. DeFayette
DOE	123	T. Elsasser
DCPA	208	J. Hufham
FDAA	220	A. Robart
FPA	221	T. Essig
HEW	308	R. Cleveland

1373 139

ATTACHMENT 2

7:30 P.M. Adivsory Committee Work Sessions

Committee	Room No.	NRC Representative
RAC 1 (Boston)	220	R. DeFayette
RAC 2 (New York)	221	R. Jaske
RAC 3 (Phildelphia)	208	T. Elsasser
RAC 4 (Atlanta)	308	J. Hufham
RAC 5 (Chicago)	109	T. Essig
RAC 6 (Dallas)	118	G. Brown
RAC 7 (Kansas City)	119	S. Bajwa
RAC 8 (Denver)	123	R. Van Niel
RAC 9 (San Francisco)	320	A. Robart
RAC 10 (Seattle)	321	R. Cleveland
HAC	408	H. Gaut

1373 140

A LOOK AT TWELVE STATE RADIOLOGICAL EMERGENCY RESPONSE PLANS HAVING NRC CONCURRENCE

Robert T. Jaske
Technical Advisor to the Director
Office of State Programs

For Presentation at the NRC Radiological Emergency
Training Conference, July 24, 1979, Kansas City, Missouri

A LOOK AT TWELVE STATE RADIOLOGICAL EMERGENCY RESPONSE PLANS HAVING NRC CONCURRENCE

In the months just before Three Mile Island, the Office of State Programs was able to concur with the emergency preparedness plans of 12 States. This was accomplished in the face of a number of obstacles by a lot of hard work on the part of the regional and headquarters advisory committees, and by the States. With the experience of Three Mile Island behind us, the office is now hopeful that all States involved directly or indirectly with fixed nuclear facilities can reach concurrence during 1980. This will place additional burdens on the established plan review system in the face of potential changes resulting from legislation and rulemaking.

As part of this new effort, we thought it would be useful to examine the 12 concurred-in plans in order to help us find areas of interest which may need additional attention. This examination was done in two parts. First, we looked at the reports of the regional advisory committees seeking threads of concern for the treatment of specific elements in the existing guide and checklist document, NUREG-75/111. Second, in the light of Three Mile Island, we reviewed the individual plans in order to find elements which might be better addressed.

Both of these examinations revealed important lessons which I would like to share with you today. In the discussion which follows, I would like to emphasize that we are looking for ways to do the job better. Most of the judgments are highly subjective, and rest on conceptual notions of events which might never take place. Specific elements of State plans which I will mention may in fact mean different things to different people. I hope you will join with me in the spirit of this undertaking, and if you disagree on a given judgment, try to find why such a differing view can exist, and what we can do about it.

To begin with, I mentioned obstacles. I will preface this discussion with a brief list of these as they relate to success and consistency of the planning process. In my judgment these obstacles are:

1. There is no consensus on the nature of the accident to plan against.

2. NRC guidance in critical areas of early notice and accident assessment is imprecise and unevenly administered.

3. Response activities are hampered by lack of radiation instrumentation for early warning and assessment.

4. Funding for training and support has not been adequate, and existing expenditures are unevenly focused at differing levels of government.

5. Information gathering and assessment technology is insufficiently deployed at all levels of government.

6. Federal guidance on protective action guides is slow in coming.

Three Mile Island has served to emphasize these obstacles, and all of these are currently being addressed by a host of investigating bodies. Meanwhile, we must get on with the job and do the best we can.

Turning now to the job at hand, I begin by listing the 12 States for which concurrence exists.

Table I - States with Concurred-in Plans

	Original Plan Date	Concurrence Date
Alabama	2/16/78	2/9/79
Arkansas	5/78	5/3/79
California	8/78	8/15/78
Connecticut	3/77	12/21/77
Delaware	6/6/78	7/24/78
Florida	6/78	8/4/78
Iowa	6/30/78	2/27/79
Kansas	8/78	9/19/78
New Jersey	8/77	9/30/77
New York	12/78	1/23/79
South Carolina	9/77	11/23/77
Washington	5/76	3/29/77

All of these achieved concurrence before Three Mile Island.

Observations of the Regional Advisory Committees

In reviewing plans, the regional committees are asked to seek the 154 elements listed in NUREG-75/111 and make a judgment as to their existence, their strength and if uncertainties in strength exist to flag these. If all of the 70 elements deemed essential by the Office of State Programs are present, a plan is considered for concurrence pending a formal exercise.

The records of this plan evaluation process are important in determining if generic topics which can be called consistent problem areas are identified. Such problem areas may well rest with the NRC guidance documentation itself. The Office of State Programs has recently met with a number of regional advisory committee people in order to work out a more consistent basis for making judgments on plan content and strength. We will be talking about that later on today.

The regional committee reports did identify some critical elements where there are either weaknesses or reasons to withhold final judgment.

1373 143

Table II - Critical Elements Requiring Additional Attention

Element	Element Name
204	Formal Intragovernmental Relations
246	Communications Plans
249	Public Communication
258	Medical Transportation
265	24 Hour Dosimetry Service
266	Radiological Exposure Control
281	Liaison for Radiological Response Training
291	Review and Update of Response Plan
311	Radioprotective Drug Administration
422	Accident Area Controls

Taken as a whole, this group implies a generic problem in mobilization of radiological information and in command responsibility for knowing what is going on and what to do about it. This generic problem was present at Three Mile Island with respect to early conditions and in the assessment of those conditions which required formal actions by authorities.

The committees also noted weaknesses or unresolved matters in 29 additional elements not on the present critical list. For brevity, I have grouped these into the four headings of the guidance document NUREG-75/111.

1. Radiological Emergency Response Elements
   The 17 elements needing attention or clarification could be grouped into four key topics. These are:

   a. Functional descriptions of transportation and rescue activities including provision for operation in inclement weather.

   b. Means to integrate the Federal response in a timely and effective manner.

   c. Means to deal with operations in the controlled area in authorities, communications, information and records, and physical support.

   d. Exercise scenarios which adequately test the response plan.

2. Implementing Instruction Elements
   The three elements found here deal with the very important generic subject of accident categories, the implementing of RAP/IRAP team responses to these categories and regional arrangements for organizing general Federal assistance in response to the categories.

3. Operational Procedure Elements
   Four relatively diverse elements were found to need attention. These were:

a. Operations in Controlled Areas
b. Medical Follow-up
c. Equipment Testing
d. Provisions for Updating Plans

4. Resource Elements
The five elements in this category related to the generic problems of identification and listing of consultative support, equipment inventories and distribution, meteorological liaison and provisions for feeding people and animals.

Taken as a whole, the analysis of the regional advisory committee response suggests some reevaluation of what is deemed critical in several important areas. These are:

1. General planning to integrate the Federal response
2. Radiological assessment and operation control in the controlled areas
3. Attention to exercises, scenarios and plan updating
4. Information analysis, records and data management in real time
5. General planning to better integrate communications, personnel and equipment
6. Clear guidance for evaluation of essential elements

Personal Observations on Concurred-in Plans

With the data from the regional advisory groups available and Three Mile Island fresh in mind, I reviewed the plans of the 12 States which had achieved concurrence. As a general observation, I found considerable variation in form and conceptual approach. In each of the 12 plans, there were some notable good points which I will cover briefly later on.

I also found what I think are some generic weak points which I have listed below. I stress that these are personal judgments and impressions upon which reasonable persons can disagree, but which I commend to your attention. The order of listing is not a priority but follows the sequence from planning to dealing with an actual event.

1. The State plans are generally weak in the formulation and testing of exercises and drills and are uneven in the relative response of counties and the States. States are stronger in those aspects of planning which reflect ongoing experience with natural disasters which occur from time to time and give incentive to plan development.

2. Attention to formal training and the certification of persons with established credentials is limited outside of police, fire and military operations. The designation of key decision makers is not clearly related to the depth of knowledge and experience in emergency management. This is especially evident at the local government level.

3. The relationship with the Federal government is not clear either in designation of responsibilities or the use of Federal resources. Accident categories are not related to Federal response in either time or severity. Also it is not clear that Federal agencies

have a site specific response plan which integrates with State and utility accident plans. For a severe accident which develops within 8 hours, with the present planning structure, it does not appear that Federal resources could be effectively used. Those aspects of State plans which are derived from planning for general military attack better address Federal response, perhaps reflecting longer term thinking and preparation in conjunction with the Defense Civil Preparedness Agency.

4. The plans for utilization of radiation detection instruments, especially dosimeters, are highly dependent on the ability to mobilize the appropriate response team. Only one State, Connecticut, has a firm plan for overal dosimeter distribution. Of the lessons learned at Three Mile Island, this one is very significant to response planning. It appears time that we should pay more attention to radiation assessment and response over short time intervals, and more attention needs to be focused on dosimetry and associated record keeping. This impacts directly on the relationships of State and county command functions.

5. The utilization of laboratories, the availability of instruments and the planning for massive sampling is somewhat taken for granted. We have also learned from Three Mile Island that sampling, timing, analysis and reporting are integral parts of the executive management response and a highly organized, multiagency effort supported with good communication needs to be in place when needed.

6. Notification arrangements with facility operators are not clear, and are not well supported with formal agreements. The judgment on notification with respect to accident categories is often convoluted by communication chains through local government. Such a system is appropriate for lesser accidents (through Class 8), but could involve breakdown of the system if major accidents are impending over a short time frame.

7. Many States have adopted nonuniform accident categories which differ from NRC guidance such as Reg. Guide 1.101. Also, planning in some States (Florida, New York, Kansas and New Jersey) is expressly limited to design basis accident (Class 8) scenarios required by NRC licenses. Other States such as Connecticut and California implicitly accept the design basis accident by reference to utility plans. It is clear that resolution of this matter is of high priority and adoption of the Emergency Planning Zone concept (NUREG-0396) and plausible scenarios as part of Federal guidance is necessary before States can act to clarify this aspect of their plans.

8. With the exception of Connecticut, there is little evidence of planning for the retention of essential public services or dealing with the curtailment of industrial operations such as refineries or metal reduction plants. The limited evacuation plans are imprecise in this regard and they do not account for sheltering of key workers at critical facilities. This aspect of planning suggests a closer merging of thinking between a general emergency from a fixed nuclear facility and that of limited nuclear attack.

9. Finally, the communication plans of most States, excepting California, rely heavily on the commercial telephone. We know from Three Mile Island that the use of commercial telephone is infeasible in a general or lesser emergency. Critical persons cannot be mobilized or equipment dispatched because of overloading of circuits. The situation calls for improvements especially for those aspects which involve mobilization, data gathering and command decisions. Also, the wide range or radio frequencies employed in the United States for normal activities enormously complicates command function in either real emergencies or exercises.

On the positive side there is much good in the 12 concurred-in plans. In the aggregate they represent a lot of hard work by a lot of dedicated people working with very limited resources. At the risk of leaving some strong points out, I will make a brief comment on each of the plans in order to put some perspective on the group as a whole.

Alabama

This plan emphasizes county responses from the ground up and is based in part on the use of fixed monitors to supplement the early notice by operators. It has a well developed notification chain for State and local government, but is less strong in planning for Federal involvement.

Arkansas

This plan depends heavily on State officials and is relatively nonspecific about county actions. The legislative basis is well defined, and much of the detail on individual actions is specifically delegated by statute.

California

This State has a well developed communication plan based on an independent microwave network and places minimum reliance on commercial telephones. The county plans are strong, but uneven. The plan relies specifically on use of the military department to support evacuations, and reflects the frequency of natural disasters which impact that State. Early notice by facility operators is well organized and supported by specific memos of understanding.

Connecticut

More than any State, Connecticut has a very detailed command and response plan down to individual officials of local government. It has express provisions for dosimeter distribution and radiation assessment down to local government. The procedural checklist is exhaustive. It organizes resources effectively and includes specific command functions for maintenance of essential functions such as water supply and sewerage through the engineering staffs. It is less well developed with respect to the operator/government interface and with Federal agencies.

Delaware

The State level plan is well balanced between planning and resources and is commendable for a State without an operator facility. They pay a lot of attention to radiation control in the impacted areas. As in Connecticut it deals with the engineering function for essential

services very effectively. Delaware is, however, not strong in county response and training, and depends heavily on coordination with Maryland and New Jersey for notifications.

Florida

Florida has a good balance between State and county responses and the administrative interties are well developed. The county evacuation plans are detailed and the authorities are well documented. Dosimeter distribution is planned from State Health Department stocks. Florida has, however, limited its planning to design basis accidents which reflects on its planning for accident area control and coordination with Federal agencies. The State plan reflects a maturity gained from frequent exposure to natural disasters.

Iowa

On paper, the Iowa plan is the tightest administrative package and is well detailed in essential areas of authority and response control. The plan places heavy emphasis on the national guard through the Military Division. The plan is unique in its emphasis on transportation planning including air traffic control. The coordination with Federal agencies is clearly developed, including early notice. The State patrol is part of the radiation assessment function. Less strong are its provisions for central control of the responses to accident categories.

Kansas

Responsibilities are clearly indexed by a matrix and command authorities are strong and specific. Like Florida, its plan is specifically limited to design basis accidents and the State may have insufficient resources for a larger accident particularly with response to radiation assessment in the control area. Since it has no operating reactors, it depends on Nebraska for early notice. Accordingly, county plans are generic as to evacuation and population control

New Jersey

The New Jersey plan is technology forcing, based on the design basis accident data of the operating facilities. Lines of authority are crisp and well defined. The evacuation plans are specific, including a 6-hour time goal, and are carefully coordinated with county authorities. Specific attention is given to the facility internals and the responses are clearly tied to the stated accident categories. Advance provisions for area wide monitoring and sampling exist and the provisions for effective use of radiation control laboratories are exceptional. As in many other States, however, provisions for integrating the Federal response are not well developed.

New York

The basic planning is complete and well supported by legislative basis. Communications are well developed and have extensive redundancy. As in the New Jersey plan, it is closely related to design basis accident plans by utilities. There is express provision for DOE/RAP participation. Considerable attention is given to agricultural land controls. The plan is, however, relatively weak in accident area controls, radiation assessment coordination and evacuation response. The categories of response differ from facility to facility.

1373 148

South Carolina

This State plan is also well developed and has good administrative support. Response is keyed to development of an ongoing incident through effective integration of radiation assessment functions. Planning for evacuations is specific and supported by clear lines of authority. The plan does not include specifics on county capabilities, and response depends heavily on the State management function. The communication plan depends heavily on commercial telephone and could use additional resources.

Washington

The Washington plan emphasizes the role of counties to a great extent because of the practical difficulties of mobilizing State response. It includes complete analyses of control room functions of commercial facilities and carefully integrates operator response with potential accident categories and evacuation response. The administrative function is well defined and supported by legislative basis and memoranda of understanding. The State Patrol is prepared to participate in radiation measurement and accident area control with local government. Express provisions for interstate cooperation are in place. Washington relies heavily on Federal assistance but the express provisions for integrating Federal response could be strengthened.

It is clear that we ought to be doing something to improve plans with an NRC concurrence. We intend to work on a cooperative basis with these States and local governments during the months ahead. I have consulted with the emergency preparedness staff and have the following observations to offer.

First; our letters of concurrence sent to the lead agency officials in the State, responsible for this kind of planning, identified some essential planning elements which in the opinion of the regional advisory committees were judged to be only "fair" in terms of adequacy. Our letters go on to say that the States should pay particular attention to the adequacy of these planning elements in annual exercises of the emergency plans. Necessary improvements in the plans should then be made based upon the results of these exercises. The Federal team and the States should be paying particular attention to those "fair" planning elements, and to the other generic weaknesses that I have just mentioned. The Federal team and the States should work together to eliminate or minimize the weaknesses and upgrade the planning elements judged to be "fair" in terms of quality of development.

Second; we need to have good exercises, testing as much of the emergency plans as we can. The exercises should involve the entire response organization, right down to the local government level. NRC will, with the help of Sandia Laboratories and its sub-contractors, prepare standardized exercise scenarios that the States and local governments can use to test emergency plans. "Tabletop" exercises are of limited value and are useful as a pre-exercise drill to work out the bugs prior to conducting a definitive exercise in the field. "Tabletop" exercises will not be acceptable to the Federal teams observing an exercise to test a plan. We will be asking the States with concurred-in plans to advise us of the specific dates for their next exercise so we can schedule Federal teams, assisted by contractor personnel, to assist the States and local governments in conducting, observing

and evaluating the exercises. We are making plans with the NRC Office of Nuclear Reactor Regulation to have NRC teams observe, evaluate, and critique the licensee's portion of each exercise. Licensee excercises and State and local exercises should be jointly conducted.

Third; we intend to look at the concurred-in plans from an acceptance criteria standpoint, primarily as acceptance criteria relate to those planning elements judged to be "fair" and to the generic weakness which I have mentioned.

In closing, I wish to thank you for your continued assistance in the review and development of these plans. My own review has been designed to assist your work by providing the perspective of a new look by a previously noninvolved party in combination with my own view of the problems posed by Three Mile Island. I hope this review has been useful. I'd be happy to answer any questions you may have.

Adequacy and Acceptance of Emergency Planning Around Nuclear Facilities

[10 CFR Part 50]

AGENCY: U.S. Nuclear Regulatory Commission.

ACTION: Advance Notice of Proposed Rulemaking.

SUMMARY: The Nuclear Regulatory Commission is considering the adoption of additional regulations which will establish as conditions of power reactor operation increased emergency readiness for public protection in the vicinity of nuclear power reactors on the part of both the licensee and local and state authorities. The Commission is interested in receiving public comment on objectives for effective plans, acceptance criteria for State/local emergency plans, NRC concurrence in State and local plans as a requirement for issuance of an operating license or for continued operation of a nuclear facility, and coordination between the licensee plan and State and local plans. The Commission seeks written comments on what items should be included in the rule.

DATES: Comments are due no later than August 31, 1979.

ADDRESSES: Written comments concerning these issues should be submitted to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555.

FOR FURTHER INFORMATION CONTACT: Patricia A. Comella, Site Designation Branch, Office of Standards Development, Nuclear Regulatory Commission, Washington, DC 20555, 301-443-5981.

SUPPLEMENTARY INFORMATION: The NRC requires that power reactor license applicants plan for radiological emergencies within their plant sites and make arrangements with State and local organizations to respond to accidents that might have consequences beyond the site boundary. In this way off-site emergency planning has been related to the nuclear licensing process. *See* 10 CFR Part 50, Appendix E (1979), *see also* additional guidance in U.S. NRC, Regulatory Guide 1.101, "Emergency Planning for Nuclear Power Plants," (Rev. 1, 1977).

To aid State and local governments in the development and implementation of adequate emergency plans, the NRC, in conjunction with seven other Federal agencies, has attempted, on a cooperative and voluntary basis, to provide for training and instruction of State and local government personnel and to establish criteria to guide the preparation of emergency plans. However, the NRC has not made NRC approval of State and local emergency plans a condition of nuclear power plant operation.

The accident at Three Mile Island has raised a number of questions about the adequacy of radiological emergency response plans. Even before the accident the GAO had recommended that NRC not license new power plants for operation unless off-site emergency plans have been approved by the NRC. GAO, Report to the Congress, "Areas Around Nuclear Facilities Should Be Better Prepared For Radiological Emergencies," March 30, 1979. The Commission is also considering new guidance to State and local governments on emergency planning, based on an analysis of a joint NRC-EPA Task Force Report. "Planning Basis for Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," NUREG-0396/EPA 520/1-78-016, December 1978. *See* 43 Fed. Reg. 58658 (December 15, 1978), *see also* 44 Fed. Reg. 23137 (April 18, 1979). Furthermore, a number of organizations, including Critical Mass and Public Interest Research Groups, have renewed and supplemented a petition for rulemaking, previously denied by the Commission, concerning the operational details of evacuation planning. *See* 44 FR 32486 (June 6, 1979).

The Commission has decided to initiate an expedited rulemaking procedure on the subject of State and local emergency response plans and those of licensees. The Commission is soliciting public comments in this area, particularly on the following issues:

1. What should be the basic objectives of emergency planning?

a. To reduce public radiation exposure?

b. To prevent public radiation exposure?

c. To be able to evacuate the public?

To what extent should these objectives be quantified?

2. What constitutes an effective emergency response plan for State and local agencies? For licensees? What are the essential elements that must be included in an effective plan? Do existing NRC requirements for licensees (10 CFR Part 50, Appendix E) and guidance for States (NUREG-75/111) lack any of these essential elements?

3. Should NRC concurrence in the associated State and local emergency response plans be a requirement for continued operation of any nuclear power plant with an existing operating license? If so, when should this general requirement become effective?

4. Should prior NRC concurrence in the associated State and local emergency response plans be a requirement for the issuance of any new operating license for a nuclear power plant? If so, when should this general requirement become effective?

5. Should financial assistance be provided to State and local governments for radiological emergency response planning and preparedness? If so, to what extent and by what means? What should be the source of the funds?

6. Should radiological emergency response drills be a requirement? If so, under whose authority: Federal, State or local government? To what extent should Federal, State, and local governments, and licensees be required to participate?

7. How and to what extent should the public be informed, prior to any

emergency, concerning emergency actions it might be called upon to take?

8. What actions should be taken in response to the recommendations of the joint NRC/EPA Task Force Report (NUREG–0396/EPA 520/1–78–016)?

9. Under what circumstances and using what criteria should a licensee notify State, local, and Federal agencies of incidents, including emergencies? When, how, to what extent, and by whom should the public be notified of these incidents?

The comments received will be collected and evaluated by the NRC staff, which will, in turn, submit recommendations on proposed rules to the Commission. Based on the comments it receives from the public and the analysis of the problem presented by the NRC Staff, the Commission will determine whether to proceed with a proposed rule for notice and comment and/or whether to make such rule immediately effective. The Commission anticipates completion of this expedited rulemaking in approximately six months.

The NRC staff is presently conducting a comprehensive review of all aspects of the NRC emergency planning and preparedness program. Therefore, the Commission is also interested in receiving comments on all other aspects of emergency planning, including issues raised in the Critical Mass/PIRG petition for rulemaking and questions such as the following:

10. How and to what extent should the concerns of State and local governments be incorporated into Federal radiological emergency response planning?

11. How should Federal agencies interface with State and local governments and the licensee during emergencies?

12. Should the licensees be required to provide radiological emergency response training for State and local government personnel? If so, to what extent? Should the Federal government provide such training? If so, to what extent?

13. To what extent should reliance be placed on licensees for the assessment of the actual or potential consequences of an accident with regard to initiation of protective action? To what extent should this responsibility be borne by Federal, State or local governments?

14. Would public participation in radiological emergency response drills, including evacuation, serve a useful purpose? If so, what should be the extent of the public participation?

Dated at Washington, D.C., this 12th day of July, 1979.

For the Commission.

Samuel J. Chilk,

Secretary of the Commission.

[FR Doc. 79–22078 Filed 7–16–79; 8:45 am]

BILLING CODE 7590–01–M

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I. Some Notes on Acceptance Criteria

The original NRC guidance document "Guide and Checklist" was first published in December 1974. The original list of guidance elements was developed as an all inclusive list of items that would be desirable in a comprehensive State radiological emergency response plan.

When the States started using this guidance document, however, they soon observed that many of the elements, although certainly desirable, did not appear to be absolutely essential. There was a concensus that some items didn't affect the ability of the State to protect the health and safety of the public during the early phases of an emergency. Provisions for recovery, for example, would not necessarily be part of the emergency plan although they would obviously be a necessary component for after accident response. The original list of 154 elements was after long review by interested parties narrowed in 1977 to 70 essential elements. Supplement 1 published in March 1977 said all of these would have to be adequately addressed in the response plan before concurrence would be granted by the NRC.

We moved then from a theoretical discussion to a practical one. We must now ask fundamental questions such as what constitutes an adequate discussion of an element in the plan. During the two years that the "essential element" concept has been used, the interpretation of "adequate" has been left to the individual reviewers. Generally speaking, this has been satisfactory. But, now that the State/local radiological emergency response planning is becoming more formal, we believe that the review process should be made as objective as possible. If we do this, it will allow reviewers to evaluate all elements in the same way and keep the subjectivity to a minimum. The attached document describes acceptance criteria in objective terms for each of the elements. Not only will it give the Federal reviewers a baseline upon which to review a plan, but it will also give

the plan writer a better understanding of what is required for concurrence. These suggested criteria are not hard and fast; they must be reviewed and "field tested" by all parties who will be using them.

II. Definition

Acceptance criteria are baseline or minimum criteria that must be addressed before an element can be found to be satisfactory. We hope that each State will not limit itself to simply satisfying them but they will use the criteria as the baseline to develop whatever further planning may be necessary for its own situation.

III. Concurrence

As was stated earlier, Supplement 1 to NUREG-75/111, which was published on March 15, 1977, describes the essential elements. The supplement also said that the plan must be tested at least annually by the State in order to maintain the concurrence. We also believe and have said for sometime that a new plan must be tested before concurrence is granted. Such an exercise must go beyond a "table top" exercise. It must include, as a minimum, a limited field exercise. The exercise should include participation by all parties described in the plan. We also recommend that the exercise be conducted in conjunction with the annual exercise conducted by licensees. The basic purpose of the exercising is to check for capabilities in addition to determining of the plan itself is satisfactory.

IV. Plan Review

During the review process, as reviewers evaluate the elements assigned to them they should have only three choices: either to accept what is written or to reject it or note that it is missing. In the past, there have been four choices;

1) missing; 2) unacceptable; 3) acceptable but needing improvement; 4) acceptable. We think the time may have come to eliminate the third step, "acceptable but in need of improvement." In addition, when an element is not accepted, the reasons for the rejection should be stated in writing to the State or local government. We will encourage the States to submit a table or index listing each essential element and where it can be found in the plan. Such a list will enable each State to determine if it has forgotten any element and also make our review easier.

Finally, the concurrence process should not be considered static. Rather, it must be dynamic. A plan should undergo continuous review and updating. If at any time during the process one or more essential elements are found to be inadequate, the State shall be notified and urged to correct the deficiency. If this correction is not completed in a timely manner, concurrence can be withdrawn by the NRC after consultation with other members of the Federal Interagency Central Coordinating Committee (FICCC).

We have had many questions about the relationship of local plans to State plans. Obviously, many of the essential elements pertain more to the local level than to the State level. If local plans are submitted for review with State plans, then the local plans are also reviewed. The 70 essential elements must be found adequately addressed in the two plans. If local plans are not submitted, then the 70 essential elements must be adequately addressed in the State plan.

Finally, the question of tests or exercises for States with more than one facility must be addressed. We recommend that the State be intimately involved once a year with at least one facility and locality. For other facilities only the local aspects would be involved; in all cases the communications should be checked out annually with the State.

We intend that such concurrence be site specific. In other words, it is quite possible that a State/local plan could be acceptable for one site in a State but not for another. This could come about in several ways. For example, a local plan could be acceptable for site A but the local plan for site B may not be. Or, the State plan may not be required to address the elements of contiguous planning for one site if there are no other States within 50 miles. But there could be a second site in which contiguous planning is required. In this case, the plan would receive concurrence for the first site but not for the second. If there are any questions which cannot be resolved by the regional reviewers, the questions will be resolved by the Headquarters Advisory Committee.

Definitions and Acronyms in Attached Material

Category "A" States	Those with operating facilities and no "concurred in" plan.
Category "B" States	Those (other than "A") contiguous to an operating facility in an adjacent State.
Category "C" States	Those (other than "A" or "B") with plants under construction.
Category "D" States	Those (other than "A," "B," or "C") contiguous to a plant under construction in an adjacent State.
Category "E" States	Those who have already received NRC concurrence.
Stages of development that States appear to be in:	Stage I- Identification of principals, determination of internal State priorities, and assessment of the status of State planning material. Stage II- Development/compilation of planning materials. Stage III- Evaluation/upgrading of planning materials. Stage IV- Critique of exercises.
PRERAD	(Peacetime Radiological Emergency Response Audit Device) A "PERT" type system for making an objective and semi-quantitative evaluation of a plan/exercise.
RAC	Regional Advisory Committee.

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ATTACHMENT I

Staff Assignments

1. Hal Gaut will coordinate field assistance, review & concurrence operations and follow up on existing concurrences.

2. Bob DeFayette will support development of New England regional plan, manage training program and assist in coordination of overall field assistance efforts.

3. Rod Mason will interface with the public sector, assist in coordination of in-house activity in support of field assistance and deal with special problem areas as required.

4. Dick Clevenger will develop demographic data in support of local & contiguous planning efforts, and specific field needs and priorities.

5. State programs regional staff (Tom Elsasser & Andy Rovart) will retain lead in NRC regions 1 & 5.

6. IE regional staff will retain lead in NRC regions 2,3,& 4 as time permits, keeping coordinator of field operations aware of any projected short-fall.

7. Dick Van Niel will support efforts in the 16 category 'A' States & coordinate periodic State status reports for all categories.

8. Dick Cleveland will support efforts in the 12 category 'B' ,'C' & 'D' States. (And 'A' as time & scheduling permit.)

9. Singh Bajwa will support efforts in category 'E' States and apply PREPAD analyses to 'pending' and 'concurred in' plans.

10. Bob Jaske will provide quality control support on the concurrence process, including a critical review of the 12 existing concurrences.

11. Ben Harless & Steve Salomon will edit exercise reports, develop improved methods of exercise evaluation, evaluate cost impact of exercise activity and prepare responses to congressional and related enquiries for detailed emergency preparedness information.

12. Bob Jaske, Marshall Sanders, & Steve Salomon will pursue special problem/states as needed, or noted below.

13. Jim Dukes will implement PREPAD, instruct field staff in its use and document ADP systems requirements in support of EP plan/capability analyses, act as liaison to MPA, & provide immediate ADP support as required. (Remainder of effort will be applied to overall OSP needs.)

14. MPA will develop functional systems in response to requirements evolved in item 13 above and maintain active involvement in the field test stage of the PREPAD system to ensure its reliability as an applied resource during the accelerated EP review period.

(Staff who have 'support' roles will function basically as a headquarters project manager/consultant, working closely with both the appropriate regional advisory committee chairman (or co-chairman) and the NRC action officer for a particular State.)

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July 17, 1979 ATTACHMENT II A

CATEGORY 'A' States (General project mgr. - Dick Van Niel)

State (stage) Facilities (action officer) - comment/status

COLORADO Ft. St. Vrain

(Stage III) (Paul Alley-DCPA) Revised plan due in September. Regional Advisory Committee review complete. FEMA/RAD administered 5/21,22. Concurrence is projected for October 1979.

GEORGIA Hatch 1&2, Voytle 1&2

(Stage II) (Jim Hufham) New lead agency is the Dept of Natural Resources. Draft plan is due by end of July 1979. Concurrence is projected for December 1979.

ILLINOIS Dresden 1/3, Quad cities, Zion 1&2, Braidwood 1&2, Bryon 1&2, Clinton 1&2, Lasalle 1&2, Carroll 1&2

(Stage II) (Bob Jaske) High priority effort began 6/12/79 with goal of submission to NRC by 12/31/79. Funding assured by executive allocation. State legislature moving to establish a fund from licensing fees. Concurrence is projected for mid 1980.

MAINE Maine Yankee

(Stage II) (Bob DeFayette) Plan is part of regional plan effort. (See VT) State is also proceeding independently. Draft plan due in August. No projection is available for concurrence.

MARYLAND Calvert Cliffs 1&2

(Stage III) (Dick Van Niel) Plan is under review by RAC. Concurrence is projected for December 1979.

MASSACHUSETTS Pilgrim 1&2, Yankee-Rowe, Montague 1&2

(Stage II) (Bob DeFayette) Part of regional plan effort. (See VT) Also proceeding independently. Draft plan due in November. No projection is available for concurrence.

MICHIGAN Palisades, Big Rock Point, Cook 1&2, Fermi 2, Midland 1&2, Greenwood 2&3

(Stage II) (Dick Van Niel) Plan is in preparation. Expected to be submitted for RAC review in August. Exercise scheduled in August with Palisades. No projection available for concurrence.

MINNESOTA Monticello, Prairie Island 1&2

(Stage II) (Bill Axelson) Revised plan is due to RAC for review in July 1979. Exercise planned with Prairie Island. Concurrence projected for October 1979.

NEBRASKA Ft. Calhoun 1, Cooper Station

(Stage IV) (Harold Pickering-FPA) Plan acceptable. Exercise with Fort Calhoun scheduled 7/31. Concurrence is projected for August 1979.

NORTH CAROLINA Brunswick 1&2, Harris 1/4, McGuire 1&2, Perkins 1/3

(Stage III) (Jim Hufham) Plan is almost completed. RAC review complete. Concurrence is projected for Fall 1979.

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July 17, 1979 ATTACHMENT II b

CATEGORY 'B' States (General project mgr. - Dick Cleveland)

State (stage) Facilities (action officer) - comment/status

MISSOURI Callaway 1&2, Cooper (in NE)

(Stage II) (Dick Cleveland) Plan is being written as priority effort. Draft due to RAC for review 9/10/79. MC targets concurrence, including exercise, by 1/80.

NEW HAMPSHIRE Seabrook 1&2

(Stage I) (Bob DeFayette) part of regional plan effort. -see Vermont) Also proceeding with independent action. NRC meeting with NH set for 8/13/79. Plan concurrence projected for 5/80.

RHODE ISLAND Millstone, Connecticut Yankee (in CT) & Pilgrim (in MA)

(Stage I) (Dick Cleveland) 6/1/73 plan exists for nuclear accidents. 9/78 plan exists for Disaster Preparedness. Both plans need major work and a new plan is under active development. No date yet set for submittal to NRC/RAC, but expected within 2 months. RI is being considered for inclusion in the New England regional plan.

WEST VIRGINIA

(Stage I) (Dick Cleveland) 4/15/69 Peacetime Radiological Incidents Control Plan is in effect. Aaroe (Rad Health) and Anderson (Civil Defense) have both asked for NRC assistance in making a new plan. Meeting of NRC with WV tentatively targeted for 8/79. Submittal of plan for NRC/RAC review targeted for 1/80.

OHIO — Davis Bessie 1/3, Zimmer, Perry 1&2, Erie 1&2

(Stage III) (Dick Van Niel) Revised plan out for RAC review. Response due by 7/31. Concurrence projected for Fall 1979.

OREGON — Trojan, Pebble Springs 1&2

(Stage III) (Andy Rowart) Partial Regional Advisory Committee review completed. Plan needs work. State representatives are in a state of flux as lead agency changing. No projection available for concurrence.

PENNSYLVANIA — Beaver Valley 1&2, Peachbottom 2&3, TMI 1&2, Limerick 1&2, Susquehanna 1&2

(Stage II) (Tom Elsasser) Development/active review in progress. This will be a joint effort of NRC and DCPA during the next few months. No projection available on concurrence.

VERMONT — Vermont Yankee

(Stage III) (Bob DeFayette) Plan is part of regional plan effort. Meeting held 6/11/79 in Montpelier (DeFayette) to help state get started on a re-write of its plan. Governor Snellings is pushing the regional planning concept. Bordering States are supporting it. State plan due by December 1979. No projection available on concurrence.

VIRGINIA — North Anna 1/4, Surry 1&2, Central Virginia 1&2

(Stage IV) (Tom Elsasser) RAC review essentially complete. Good exercise history. Concurrence projected for August 1979.

WISCONSIN — Kewaunee, Point Beach 1&2, LaCrosse, Tyronne, Haven

(Stage III) (Bill Axelson) RAC review complete. State informed of areas needing revision. Impending shift to contractor operated labs could cause problems. Exercise anticipated with Lacross in July 1979. Concurrence projected for Fall 1979.

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July 17, 1979 ATTACHMENT II C

CATEGORY 'C' States (General project mgr. - Dick Cleveland

State (stage)	Facilities (action officer) - comment/status

OKLAHOMA Black Fox 1&2

(Stage II) (Dick Cleveland) New start, no previous effort. Preliminary draft has been mailed by the State on May 29, 1979 for internal State review. No projection yet for submittal for RAC review. 1st operating plant scheduled for late 1982.

TENNESSEE Hartsville 1,2,3&4, Sequoyah 1&2, Watts Bar 1&2, Phipps Bend 1&2,

(Stage III) (Jim Hutham) 1st operating plant scheduled for 10/79 Plan under RAC review and RAC concurrence (Sequoyah aspects only) expected to be completed by 7/31/79.

ARIZONA Palo Verde 1,2,3

(Stage II) (Dick Cleveland) New start. Previous plans of about 1974 & 1976 are out-dated. 1st operating plant is scheduled for 1983 startup. No schedule yet for plan submittal for RAC review.

MISSISSIPPI Grand Gulf 1&2, Yellow Creek 1&2

(Stage III) (Dick Cleveland) Plan is under development by State. RAC is monitoring progress and submittal for review is expected 10/79. 1st operating plant scheduled for 3/81.

LOUISIANA River Bend 1&2, Waterford 3, Grand Gulf 1&2 (in MS)

(Stage III) (Dick Cleveland) Plan under actual development was reviewed by RAC 1/79. Resubmittal estimated for 1/80. 1st operating plant is scheduled for 9/81.

TEXAS

(Stage III) (Dick Cleveland) 1978 draft plan under RAC review. RAC met with State 5/22/79. Plan revisions expected 10/79. Much work still needed on plan.

INDIANA Bailly Station, Marble Hill 1&2

(Stage II) (Dick Cleveland) New start to revise 1974 plan which was not clearly defined. 1st operating plant scheduled for 7/83 though is within 50 miles of operating plant (Cook). NRC met with IN state staff 6/18/79. New draft plan needs major work before submittal for RAC review. IN plans to submit draft plan by 10/79.

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July 17, 1979 ATTACHMENT II D

CATEGORY 'D' States (General project mgr. - Dick Cleveland)

State (stage)	Facilities (action officer) - comment/status
KENTUCKY (Stage II)	Marble Hill (in IN), Zimmer (in OH) (Dick Cleveland) RAC Health working to update plan (current version is circa 1962) Peter Conn, Sec'y of KY Dept of Human Resources, asked at Zimmer hearing 5/23/79 for Federal assistance for KY and no license for Zimmer until effective plan is in place. Judge Greenwood of Trimble County has asked Public Service of Indiana for specific help for local plan at Marble Hill. Zimmer (in Ohio) is scheduled for operation in 3/80. OSP/EP was briefed 6/21/79 at meeting in Frankfort. Administrative part of new plan sent out for RAC review 6/28/79 (due to be completed 8/17/79). Rest of plan expected 9/79.

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July 17, 1979 ATTACHMENT II E

CATEGORY 'E' States (General project mgr. - Singh Bajwa

State	Current State plans of record in EP/OSP
Alabama	2/16/78 Alabama Emergency Plan (Annex B)
Arkansas	5/78 Emer. Operations Plan (Annex Q)
Californ.a	8/78 Nuclear Power Plant Emer. Resp. Plan
Connecticut	3/78 FNF REEP (Annex V to St. E.O.P.)
Delaware (adj.)	6/6/78 Radiological Emer. Response Plan
Florida	1978 Radiological Emer. Plan for FNF
Iowa	6/30/78 Iowa Emergency Plan
Kansas (adj.)	11/1/78 Annex A - FNF Nuc. Inc. Resp. Plan
New Jersey	11/1/77 State PIPAG manual w/app.
New York	12/78 State Emer. Plan for Radiation Acci.
South Carolina	12/30/78 Peacetime REEP
Washington	4/77 State Emergency Plan for FNF.

Attachment III
7/17/79

SCHEDULE OF EXERCISES

		Required for Concurrence	Projected by State	Scheduled
ALABAMA #1.	EXERCISE	DUE 1/80	8/79	6/30/78C*
ALASKA #2	EXERCISE	.	.	.
ARIZONA #3.	EXERCISE	.	.	.
ARKANSAS #4.	EXERCISE	DUE 4/80	.	1/16/79C
CALIFORNIA #5.	EXERCISE	DUE 8/80	.	5/2/79C
COLORADO #6.	EXERCISE	.	7/79	11/6/78
CONNECTICUT #7.	EXERCISE	DUE 11/79	6/12/79	5/12/79C
DELAWARE #8.	EXERCISE	DUE 8/79	8/13/79	9/26/78C
DIST/COLUMBIA #9.	EXERCISE	.	.	.
FLORIDA #10.	EXERCISE	DUE 7/80	NLT 10/79	8/23/79
GEORGIA #11.	EXERCISE	.	.	.
HAWAII #12.	EXERCISE	.	.	.
IDAHO #13	EXERCISE	.	.	.
ILLINOIS #14.	EXERCISE	.	.	.
INDIANA #15.	EXERCISE	.	.	.
IOWA #16.	EXERCISE	DUE 1/81	.	5/15/79C
KANSAS #17.	EXERCISE	DUE 10/79	.	6/4/79C
KENTUCKY #18.	EXERCISE	.	.	.
LOUISIANA #19.	EXERCISE	.	.	.
MAINE #20.	EXERCISE	.	.	10/18/78
MARYLAND #21.	EXERCISE	.	.	6/27/78C
MASSACHUSETTS #22.	EXERCISE	.	.	10/21/75
MICHIGAN #23.	EXERCISE	.	.	8/79
MINNESOTA #24.	EXERCISE	.	.	6/4/75C
MISSISSIPPI #25.	EXERCISE	.	.	.
MISSOURI #26.	EXERCISE	.	.	.
MONTANA #27	EXERCISE	.	.	.
NEBRASKA #28.	EXERCISE	.		7/31/79
NEVADA #29.	EXERCISE	.	.	.
NEW HAMPSHIRE #30.	EXERCISE	.	.	10/21/75C
NEW JERSEY #31.	EXERCISE	DUE 8/79	9/31/79	9/26/78C
NEW MEXICO #32	EXERCISE	.	.	.
NEW YORK #33.	EXERCISE	DUE 12/79		
NORTH CAROLINA #34.	EXERCISE	.	9/79	.
NORTH DAKOTA #35.	EXERCISE	.	.	.
OHIO #36.	EXERCISE	.	10/79	.
OKLAHOMA #37	EXERCISE	.	.	.
OREGON #38.	EXERCISE	.	8/79	9/18/78C
PENNSYLVANIA #39.	EXERCISE	.	.	6/24/76C
PUERTO RICO #40.	EXERCISE	.	.	.
RHODE ISLAND #41.	EXERCISE	.	.	.
SOUTH CAROLINA #42.	EXERCISE	DUE 5/79	8/79	11/14/78C
SOUTH DAKOTA #43	EXERCISE	.	.	.
TENNESSEE #44.	EXERCISE	.	.	7/6/78C
TEXAS #45.	EXERCISE	.	.	.
UTAH #46	EXERCISE	.	.	.
VERMONT #47.	EXERCISE	.	.	7/6/78C
VIRGINIA #48.	EXERCISE	.	.	11/4/78C
WASHINGTON #49.	EXERCISE	DUE 4/79	8/80	8/18/77C
WEST VIRGINIA #50.	EXERCISE	.	.	.
WISCONSIN #51.	EXERCISE	.	.	7/27/79
WYOMING #52	EXERCISE	.	.	.

*"C" indicates completed.

ATTACHMENT IV

STAFF GUIDANCE RESOURCES

NUREG 75/111 - Guide and checklist for RERP's.

Supplement #1 to NUREG 75/111 - Essential elements to concurrence.

NUREG 0093 - Handbook for field assistance to State & local govts.

NUREG 0396 - Planning Basis for Nuclear Accident RERP's.

Misc. Technical documents. (EG funding study, PAGS, KI guidance, etc.)

RERP information sheets (both State and subject oriented).

Field activities calendar (updated every few days).

Localities file (demographic data under development).

License Status Report (compiled from the rainbow book series).

Library of State plans of record (master reference files).

Status reports (detailed) on plans under review by RAC's.

Exercise evaluation reports of record.

Capability reports (as provided to NRR by SP).

General State correspondence files.

Rosters of participants in NRC sponsored RER courses.

Rosters of RAC, HAC, FICCC members from all participating agencies.

Rosters of State CD and RAD Health directors.

STUDY OBJECTIVES

- HISTORICAL COSTS AND FUNDING OF
  STATE AND LOCAL GOVERNMENT
  RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS
  IN SUPPORT OF
  COMMERCIAL NUCLEAR POWER STATIONS

- FUTURE COSTS

- COST IMPACTS OF EMERGENCY PLANNING ZONES

- FUTURE ALTERNATIVE FUNDING MECHANISMS

NUREG-0553
DRAFT REPORT

MANUSCRIPT COMPLETED: MARCH 27, 1979
MANUSCRIPT PRINTED: MARCH 30, 1979

STATES STUDIED

STATES	NRC CONCURRENCE	COSTS	FUNDING	LOCAL GOVERNMENT
ALABAMA	X	X	X	3 SITES
ARKANSAS		X		
CALIFORNIA	X	X	X	4
CORORADO		X		
CONNECTICUT	X	X	X	2
DELAWARE	X	X	X	1 (NJ)
FLORIDA	X	X	X	3
ILLINOIS		X	X	2
NEW JERSEY	X	X	X	2
NEW YORK	X	X	X	2
OREGON		X	X	1
TENNESSEE		X	X	2
WASHINGTON	X	X	X	2 (1 OR)
WISCONSIN		X	X	3 (1 IL)
TOTAL: 14	8	14	12	24 SITES

LOCAL GOVERNMENTS STUDIED

- ONE STATE PLANNING

BROWNS FERRY	(AL)	ST LUCIE	(FL)
HUMBOLDT BAY	(CA)	TURKEY POINT	(FL)
RANCHO SECO	(CA)	OYSTER CREEK	(NJ)
SAN ONOFRE	(CA)	FITZPATRICK & NINE MILE POINT	(NY)
HADDAM NECK	(CT)	INDIAN POINT	(NY)
MILLSTONE	(CT)	KEWAUNEE	(WI)
CRYSTAL RIVER	(FL)	POINT BEACH	(WI)

- TWO STATE PLANNING

FARLEY	(AL & GA)	SALEM	(NJ & DE)
QUAD CITIES	(IL & IA)	TROJAN	(OR & WA)
ZION	(IL & WI)		

- STATIONS UNDER CONSTRUCTION

BELLEFONTE	(AL)	WATTS BAR	(TN)
DIABLO CANYON	(CA)	WNP	(WA)
SEQUOYAH	(TN)		

SOME IMPORTANT CONSIDERATIONS THAT AFFECT COSTS

- PLANS

  MANPOWER, TRAINING, TRAVEL, SECRETARIAL SUPPORT, MAPS, PRINTING

- PREPAREDNESS

  EXERCISES: TABLE TOP TO FULL SCALE

  TRAINING: NRC - OPERATIONS MANAGEMENT & EMERGENCY RESPONSE

  RESOURCES: COMMUNICATIONS - NOTIFICATION, COMMAND, TACTICAL, WARNING

  DOSE ASSESSMENT - SURVEY, COMPUTER, RING

  PROTECTIVE MEASURES - DOSIMETERS

- OTHER: UTILITY ASSISSTANCE

  EMERGENCY PLANNING ZONES - 10 MILE EPZ - LOCAL EFFORT

  - 50 MILE EPZ - STATE & REGIONAL EFFORT

COSTS OF PLANS AND PREPAREDNESS FOR A TYPICAL STATE

	NRC CONCURRENCE	EPZ
• PLAN		
INITIAL	$50,000	$100,000
UPDATE	5,000 PER YEAR	10,000 PER YEAR
• PREPAREDNESS		
• EXERCISES	10,000 PER YEAR PER SITE	20,000 PER YEAR PER SITE
• TRAINING		
INITIAL	10,000	20,000
UPDATE	2,000 PER YEAR	4,000 PER YEAR
• RESOURCES		
INITIAL	100,000	100,000
UPDATE	10,000 PER YEAR	10,000 PER YEAR

COSTS OF PLANS AND PREPAREDNESS FOR TYPICAL LOCAL GOVERNMENT

	NRC CONCURRENCE	EPZ
• PLAN		
INITIAL	$20,000 (2 JURISDICTIONS)	$40,000 (4 JURISDICTIONS)
UPDATE	2,000 PER YEAR	4,000 PER YEAR
• PREPAREDNESS		
• EXERCISES	10,000 PER YEAR	20,000 PER YEAR
• TRAINING		
INITIAL	NONE - USUALLY DONE BY STATE	CONDUCTED BY STATE
UPDATE		
• RESOURCES		
INITIAL	30,000 (COMMUNICATIONS)	60,000 (COMMUNICATIONS)
UPDATE	3,000 PER YEAR	6,000 PER YEAR

SITES REQUIRING SPECIAL ATTENTION

(THOSE WITH POPULATION GREATER THAN 100,000 WITHIN 10 MILES)

- BAILLEY - INDIANA - 103,000 PEOPLE
- BEAVER VALLEY - PENNSYLVANIA - 154,000
- ENRICO FERMI - MICHIGAN - 185,000
- INDIAN POINT - NEW YORK - 329,000
- LIMERICK - PENNSYLVANIA - 281,000
- MILLSTONE - CONNECTICUT - 119,000
- THREE MILE ISLAND - PENNSYLVANIA - 121,000
- ZION - ILLINOIS - 282,000
- NORTH COAST - PUERTO RICO - 115,000 PEOPLE

BASIS: 1970 CENSUS

SOURCE: NUREG - 0348

FUNDING STATE GOVERNMENTS

- CIVIL DEFENSE/EMERGENCY SERVICES
  - APPROPRIATIONS
  - DEFENSE CIVIL PREPAREDNESS AGENCY (DCPA)
  - FEDERAL DISASTER ASSISTANCE ADMINISTRATION (PL 93-288)

- RADIATION HEALTH
  - APPROPRIATIONS
  - OCCASIONAL UTILITY ASSISTANCE

- PRIORITY SETTING

- CONCLUSIONS:
  - OVERALL STRENGTH BASED ON HIGH FREQUENCY NATURAL OR MAN MADE INCIDENTS
  - FUNDING LEVELS CONSTANT WITH DEMANDS INCREASING

FUNDING LOCAL GOVERNMENTS

- CIVIL DEFENSE/EMERGENCY SERVICES
  - APPROPRIATIONS
  - DEFENSE CIVIL PREPAREDNESS AGENCY

- PRIORITY SETTING
  - BUDGETS LESS THAN 1% OF COUNTY BUDGETS
  - SOME JURISDICTIONS HAVE ONLY VOLUNTEER OR PART TIME DIRECTOR
  - ALL RISK CONCEPT - NUCLEAR IS ONLY ONE OF MANY RISKS

- UTILITY TAXES

- MAJOR FINDINGS
  - NOT ALWAYS ADEQUATE FUNDS IN HOST JURISDICTIONS
  - RARELY ADEQUATE FUNDS IN NEIGHBORING JURISDICTIONS
  - NO ASSURANCE OF CONTINUITY OF FUNDING

FUTURE ALTERNATIVE FUNDING MECHANISMS

- CURRENT HYBRID APPROACH
  - INADEQUATE, SPORADIC, UNCERTAIN, FRUSTRATING
- NOT REQUIRING ADDITIONAL FEDERAL FUNDS
  - STATE TAX, LOCAL TAX, EXTENSION OF SOCIOECONOMIC FUND, STATEWIDE FUND FROM LOCAL TAX REVENUES, ENERGY TAX, APPLICANT FEE, EXECUTIVE BUDGET FUND, JOINT UTILITY/STATE/LOCAL EFFORT, UTILITY FUNDING BY MEANS OF NRC LICENSING REQUIREMENTS
- REQUIRING ADDITIONAL FEDERAL FUNDS
  - COASTAL ENERGY IMPACT PROGRAM, EXTENSION OF FEMA P & A FUNDS TO ALL RISKS, COST SHARING @ 75/25, FEDERAL CONSULTANTS, FEDERAL TRAINING & QUANTITY PURCHASING OF EQUIPMENT, LEAA FUNDING OF COMMUNICATIONS, NOAA FUNDING OF REPEATER STATIONS
- REQUIRING NRC FUNDS
  - LICENSE FEE ON UTILITY APPLICANTS, RESEARCH FUNDS, GENERAL TAX REVENUES, OFFICE OF STATE PROGRAMS CONSULTANTS ON LOAN TO STATE AND LOCAL GOVERNMENTS

- PREFERRED APPROACH: RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS FEE OF $1 MILLION PER SITE

NATIONAL PROGRAM FOR 40 STATES, 113 SITES

PRESENT WORTH COSTS 1980 - 2000: $147 MILLION

- $35 MILLION FOR NRC CONCURRENCE OF ALL IMPACTED STATE AND LOCAL GOVERNMENTS;
- $27 MILLION FOR IMPLEMENTING EPZ'S FOR MOST SITES;
- $15 MILLION FOR 24 HIGHER RISK SITES;
- $20 MILLION FOR UPGRADED PLANS AND PREPAREDNESS INVOLVING ARAC AND RING SYSTEMS;
- $5 MILLION FOR 10 OFFICE OF STATE PROGRAMS CONSULTANTS ON LOAN TO STATE AND LOCAL GOVERNMENTS;
- $5 MILLION FOR TRAINING, RESEARCH, REGIONAL PLANS FOR NRC/EPA 50-MILE EPZ, AND OTHER MISCELLANEOUS ITEMS; AND
- $40 MILLION FOR FEDERAL EMERGENCY MANAGEMENT AGENCY PERSONNEL AND ADMINISTRATION FUNDING OF LOCAL GOVERNMENT AT 100 PERCENT SUPPORT.

PRINCIPAL FUNDING MECHANISM

- FEE OF $1 MILLION PER SITE PAID BY NUCLEAR POWER STATION OWNER TO NRC RADIOLOGICAL EMERGENCY RESPONSE PLANS AND PREPAREDNESS FUND FOR STATE AND LOCAL GOVERNMENT

APPENDIX E

ESSENTIAL ELEMENTS OF

REVIEW CRITERIA FOR STATE/LOCAL

RADIOLOGICAL EMERGENCY RESPONSE PLANS

FOREWORD

In order to maintain quality and consistency in the reviews of State and local radiological emergency response plans, criteria have been developed against which to judge the plans in the determination as to NRC's concurrence with them. Draft criteria were presented at the Kansas City meeting in July 1979. Comments on that draft and on a subsequent draft dated August 13, 1979 have been considered in this present formulation of review criteria.

These criteria are based on the 70 essential elements identified in Supplement No. 1 to NUREG-75/111. These criteria basically clarify and amplify the guidance given in NUREG-75/111. There are many ongoing reviews of emergency preparedness as a consequence of the TMI accident in March 1979, including specific consideration of revision of NUREG-75/111 and the essential elements. Consideration of the results of these reviews and implementation of their recommendations will be conducted over the next year or more. Meanwhile, NRC has indicated it will continue to use the current criteria for at least the next six months. This is consistent with the guidance from the Congress as expressed in S.562, the Senate passed version of NRC FY 1980 Authorization Bill.

All comments on the draft criteria were not incorporated. Those comments which relate to revision, deletion, or addition of criteria generally have been set aside for consideration in a full revision of NUREG-75/111. It is appropriate, therefore, to regard these current review criteria as interim criteria for which there will be continuing assessment and revision as new information and policy decisions are developed.

1373 179

REVIEW CRITERIA FOR ESSENTIAL ELEMENTS OF
STATE/LOCAL RADIOLOGICAL EMERGENCY RESPONSE PLANS
Reference: NUREG 75/111
Supplement No. 1 (70 checklist essential elements)

DESIGNATED STATE/LOCAL PLANNING AUTHORITY A1 201

The Plan shall specify overall authority and responsibility for radiological emergency response planning as assigned by the governor, head of local government, or appropriate legislation.

DESIGNATED STATE/LOCAL PLANNING EXECUTIVE A2 202

The Plan shall designate, by position, a specific individual in each State or local jurisdiction who is responsible for radiological emergency response planning.

FORMAL INTRAGOVERNMENT AGREEMENTS A3 204

The Plan shall include written agreements, delegations of authority, and other formal understandings among State and local agencies involved in radiological emergency response. If not part of the plan, they should be referenced to appropriate legislation, executive orders, or other legal instruments.

RESOLUTION OF LEGAL LIABILITIES A3 288

The Plan shall identify provisions for addressing any legal liabilities incurred by emergency operations personnel in pursuit of their duties in carrying out the radiological emergency response plan.

SPECIFIC FACILITY/GOVERNMENT AGREEMENTS A4 244

The Plan shall include written emergency planning agreements, or abstracts thereof, among the facilities and State and local governments.

PROCEDURES FOR FACILITY/GOVERNMENT INTERACTION A4 428

Facility/government agreements shall set forth detailed procedural relationships governing emergency response operations and general exchange of information before, during and after incidents.

AUTHORITIES AND RESPONSIBILITIES A5 205/207/209/223/231/233/235

The Plan shall specify authorities and responsibilities for major functions of emergency response, including the following: Command and Control, Warning and Evacuation, Communications, Public Information, Accident Assessment, Protective Response (including authority to request Federal assistance), and to initiate other protective actions and Radiological Exposure Control. Legal bases for such authorities shall be indentified.

CONCEPT OF OPERATIONS B1 203

The Plan shall set forth a concept of operations that describes the operational interrelationships of all organizations with emergency roles.

ORGANIZATIONAL LISTING B2 239

The Plan shall contain a list of State and local government agencies and private sector organizations that are elements of the overall emergency response organization.

FUNCTIONS AND RESPONSIBILITIES B4 206/208/210/244/232/234/236

The Plan shall describe the functions and responsibilities of all State and local government agencies and organizations with emergency support roles. The description of these functions shall include a clear, concise summary, such as a table of primary and support responsibilities using the agency as one axis and the function as the other. The described functions shall include the following: Command and Control, Warning and Evacuation, Communications, Public Information, Accident Assessment, Protective Response, and Radiological Exposure Control.

EMERGENCY OPERATING CENTERS B6 237

The Plan shall designate the primary and secondary locations from which activities of supporting organizations can be directed. It shall include provisions for implementing and staffing these centers in a timely manner. The Plan should also include specific plans for communicating with the NRC EOC and the command center for IRAP when established.

LOCAL/STATE RELATIONSHIPS B7 245

The Plan shall include local plans and clearly identify the relationship and interface between State and local emergency response plans.

COMPATIBLE PROTECTIVE ACTION GUIDES C2 313

The Plan shall provide that mutually acceptable protective action guides and protective measures are established by agreements among government bodies in States containing or contiguous to the nuclear facility. Bases for any deviation from Federal guidance shall be explained.

INTERGOVERNMENT JURISDICTIONAL AGREEMENTS C3 243

The Plan shall describe or reference jurisdictional agreements which are the basis for coordinating the efforts of Federal, State and local bodies with contiguous jurisdictions during an emergency. Areas addressed must include communications, accident assessment, protective actions, decisionmaking, and resolution of legal problems. Such agreements shall assure that coordination will exist during emergency response operations.

1373 181

RAP/IRAF LIAISON D1 276

The Plan shall describe the liaison with the U.S. Department of Energy (DOE) Regional Coorinating Office responsible for implementing the DOE Radiological Assistance Plan (RAP) and the Interagency Radiological Assistance Plan (IRAP). The Plan shall set forth current telephone numbers of the RAP regional coordinator office and reference the resources available through RAP/IRAP. The command interaction with RAP/IRAP should be specifically described, including provisions for making use of RAP/IRAP resources, specification of persons authorized to request RAP/IRAP assistance, and assignment of operational control of RAP/IRAP teams and equipment.

NUCLEAR FACILITIES LIAISON D2 278

The Plan shall describe the liaison among the State, licensed nuclear facility operators and other nuclear or non-nuclear establishments within 100 miles of the facility capable of rendering assistance in an emergency. The Plan shall include contacts and procedures which will be used in obtaining such assistance, including those involving the Federal Government.

BASIS FOR STATE/LOCAL NOTIFICATION E.1.a 302

The Plan shall describe notification procedures that include mutually agreeable bases for notifications for each facility to which the Plan is applicable. They should be consistent with emergency action levels and other provisions of 10 CFR 50 Appendix E and NRC Regulatory Guide 1.101 or spelled out in separate memoranda of understanding among parties to the notification steps.

FACILITIES' GOVERNMENT CALL LISTS E.1.c 406

Notification procedures shall include the call lists of those responsible authorities (by position) to be notified by the operator of each facility to which the Plan is applicable. Lists should include alternates and should specify the communication pathways to key personnel.

CONTENT OF NOTIFICATION TO STATE AND LOCAL GOVERNMENTS E.1.f. 402

Notification procedures shall list the specific information to be reported by the operator of each facility to which the Plan is applicable. This information shall include at least those items which are set forth in Section E.1.f. on pages 14 and 15 of NUREG-75/111 (12-1-74). Methods of message verification should be included. Notification item E.1.f. (11) should include need (if any) for Federal assistance.

POPULATION NOTIFICATION E.2 275

The Plan shall set forth procedures for rapid notification of the populace near each nuclear facility to which the Plan is applicable. These procedures shall include: Identification of the specific organizations or individuals who will be responsible for notifying the affected population, the methods that will be used, the bases (i.e., emergency action levels) for notification, a capability for 24-hour-day notification, and a description of the information that would be communicated to the public under given circumstances.

1373 182

PROCEDURES FOR NOTIFICATION OF CONTIGUOUS STATES E.3 403

The Plan shall set forth procedures for notification and exchange of information between State and local governments in the State in which the nuclear facility is located and those in contiguous States. The Plan shall reflect that the procedures are mutually agreeable to the responsible government authorities involved and should reference appropriate instruments of understanding.

CONTENTS OF NOTIFICATION TO CONTIGUOUS STATES E.3 404

The Plan shall provide that notifications to State and local governments in contiguous States shall be patterned after an established format and shall include at least those itmes included in Criterion E.1.f. 402 (Content of Notification to State and Local Governments).

COMMUNICATIONS PLAN F.1. 246

The Plan shall include a communications plan for emergencies, specifying 24-hour-day primary and backup communications links among the nuclear facilities, State offices, Federal agencies and local governments. It should be assumed that the commercial telephone may not be available for incidents involving PAG level releases to the public.

PROVISION FOR COMMUNICATIONS WITH THE PUBLIC F.2. 249

The Plan shall provide for use of public communications media or other methods for issuing emergency instructions to members of the public. The Plan shall provide for prompt alerting of the public after such need is determined and for continuing instructions as to emergency actions to follow and updating of information about the emergency.

PUBLIC INFORMATION CONTROL POINT G.1. 273

The Plan shall describe the management control of post-accident public information matters. This shall include central control and governing authorities over issuance of post-accident public announcements within State and local governments.

DESIGNATED PUBLIC INFORMATION OFFICER G.2 272

The Plan shall identify the specific position in the State and local government (and alternates) responsible for public announcements for the categories of incidents used in the notification basis (E.1.a. of NUREG-75/111 (12-1-74).

PUBLIC WARNING PROCEDURES G.3. 412

The Plan shall describe the specific information which shall be given to the public. In particular, messages to the public giving instruction with regard to specific protective actions to be taken by occupants of affected areas shall be preplanned and included as part of the State Plan. All planned announcements shall be consistent with operational authorities and protective action guides specified in the State response plan. The Plan shall provide for continuing transmittal of information to the public over the course of the emergency.

1373 183

AVAILABILITY OF RADIOLOGICAL LABORATORIES H.4 501

The Plan shall provide an inventory of radiological laboratories or other facilities (both government and non-government) and their capabilities, whose assistance can be acquired on a timely basis. Federal facilities available in conjunction with mobilization of RAP/IRAP teams should be referenced.

ACCIDENT CATEGORIZATION DEFINITIONS I.1 238

The Plan shall identify classes of emergency situations which conform to those of the nuclear facility. Such classes shall be identified by succinct verbal designations which are compatible with NRC Regulatory Guide 1.101 classification categories. Where more than one facility or more than one State is involved, all parties shall use the same system.

ACCIDENT ASSESSMENT METHODS I.2 415

The Plan shall include the State methodology for performing accident assessment and the specific arrangements to involve Federal assistance. The methodology shall permit rapid assessment by cognizant individuals.

PROVISION FOR FIELD/MOBILE RESOUCES I.3 260

The Plan shall provide for deployment of field and mobile radiological assessment resources. It shall include, as a minimum, details of who activates the system, field team composition and transportation, communication, monitoring equipment, and notification and deployment times. Any dependence on Federal response resources shall be identified.

PROVISIONS FOR RADIOLOGICAL TEAM COMMUNICATIONS I.6 251

The Plan shall provide for a multiple level communications system to be used for the rapid transfer of information from field survey teams to State and local EOC's. It should be assumed that commercial telephone may not be available for incidents involving radiation at PAG levels. The Plan shall include the locations of radios and means by which they may be procured. In the absence of radios, an estimate shall be provided for the time required from data collection to availability at the central control point.

FACILITY ENVIRONS MAPS I.7. 432

The Plan shall include maps of the environs of each facility to which the Plan applies. These maps shall identify evacuation routes and reception centers. These maps shall show key points for collection of survey and monitoring data, plus key land use data such as farms, food processing plants, watersheds, water supply intake and treatment plants and reservoirs. Adequate supplies of maps shall be maintained at key locations.

PROTECTIVE ACTIONS GUIDES (FOODSTUFFS) J.2. 308

The Plan shall include PAGs and associated protective actions for the ingestion pathway. Bases for any deviation from Federal guidance shall be explained.

1373 194

METHODS FOR CONTROL OF FOODSTUFFS J.3 425

The Plan shall list all critical ingestion pathways around each facility to which the Plan applies. It shall specify procedures for detecting contamination, for estimating the dose commitment consequences of eating contaminated foods, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation.

PROTECTIVE ACTION GUIDES (CONTAMINATION) J.4 309

The Plan shall include PAGs and associated protective actions for ground deposition contamination which poses potential for radiation exposure to persons. Bases for deviation from Federal guidance shall be explained.

EVACUATION PLANS AND PROCEDURES J.7 417

The Plan shall include evacuation and relocation procedures within the low population zone (LPZ) and beyond as appropriate. Such procedures shall be coordinated with a standard description and sequence of sectors in projected plume pathways.

ALTERNATIVE PROTECTIVE MEASURES J.8. 312

The Plan shall discuss alternative measures to evacuation, including sheltering in private homes, and the bases for taking such alternative measures.

RADIOPROTECTIVE DRUG ADMINISTRATION J.9 311

The Plan shall describe the policy and procedures for administering and distributing radioprotective drugs to members of the populace and emergency workers. This shall include storage locations, organizations involved, and methods of distribution for various accident categories.

DEMOGRAPHIC DATA J.10. 240

The Plan shall contain population distribution maps for a 50 mile adius surrounding each facility to which the Plan applies. Updating shall occur at least during the year following each U.S. census.

ACCIDENT AREA CONTROLS J.12 422

The Plan shall provide for establishing control of access into areas by all transportation modes within 10 miles of each facility to which the Plan applies; shall specifically identify the Federal/State/local chain of command responsibilities, and the authorities for such controls.

PERSONNEL ACCOUNTING IN AFFECTED AREAS J.13. 420

The Plan shall specify procedures for accounting for persons involved in the accident and/or evacuated from the accident environs.

1373 185

RADIOLOGICAL EXPOSURE CONTROL K.1. 266

The Plan shall specify criteria and bases which govern radiation exposure of emergency workers and the general public. A basis for estimating total population exposure shall be part of the exposure control plan. Any deviation from applicable EPA/FDA PAGs shall be justified.

24-HOUR DOSIMETRY SERVICE K.2. 265

The Plan shall include provisions for 24 hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear incident, including volunteers such as the Red Cross. Locations and means for distribution of dosimeters shall be included. Such services shall include both selfreading and permanent record devices.

RADIOLOGICAL MONITORING OF EVACUEES K.5. 262

The Plan shall provide for the systematic monitoring of evacuees as appropriate and the recording of their measured or estimated radiation exposures. It shall also describe the methods for such monitoring.

DECONTAMINATION OF PERSONNEL K.6. 261

The Plan shall provide for radiological decontamination of emergency personnel, evacuees, supplies, instruments, and equipment. It shall provide for necessary equipment and waste disposal to perform decontamination. It shall contain instructions and action levels for advising personnel who may be contaminated to report to a screening area.

LOCATIONS OF MEDICAL FACILITIES L.3. 513

The Plan shall include maps showing the locations of hospitals and other medical facilities capable of treating radioactively-contaminated patients out to a radius of 50 miles. These facilities should be covered by appropriate agreements to receive patients.

TRANSPORTATION TO MEDICAL FACILITIES L.4. 258

The Plan shall identify medical services organizations (ambulance service, rescue squad or fire department) within 50 miles of each facility to which the Plan applies which can transport offsite victims of radiological accidents to a medical facility.

STATE AND LOCAL DRILLS AND EXERCISES N.1. 284

The Plan shall provide that an emergency response exercise will be conducted prior to adoption of the Plan and at least once per year thereafter to demonstrate the viability of the Plan. An exercise must include mobilization of State and local personnel and resources adequate to verify the capability to respond to the given accident scenario.

CRITIQUE AND IMPROVEMENTS OF DRILL AND EXCERCISES N.3. 285

The Plan shall provide for a critique of the annual exercise by Federal and State observers/evaluators.

EQUIPMENT AND SYSTEMS TESTING N.4. 286

The Plan shall provide that communications systems and other emergency equipment will be tested as part of annual field exercises.

RADIOLOGICAL RESPONSE TRAINING O.1. 280

The Plan shall include a radiological response training program for instructing and qualifying the personnel who will implement the Plan.

LIAISON FOR RADIOLOGICAL RESPONSE TRAINING O.2. 281

The Plan shall identify the responsibility of each facility to which the Plan applies to provide site specific radiological response training for those off-site emergency organizations who may be called upon to provide assistance to the facility in the event of an emergency.

PROVISIONS FOR PERIODIC TRAINING O.3 283

The Plan shall provide for annual retraining of personnel with emergency response responsibilities.

ANNUAL REVIEW AND UPDATE OF RESPONSE PLAN P.1. 291

The Plan shall be reviewed and updated on an annual basis. Provisions for incorporating improvements found needed by exercises shall be identified. The position responsible for this effort shall be specified.

PROVISIONS FOR PROMULGATION OF PLAN CHANGES P.2. 290

The Plan shall provide that approved changes to the Plan will be forwarded to all of the users of the Plan. The change procedure shall provide that change pages are dated and marked to show where changes have been made.

PROVISIONS FOR PLAN DISTRIBUTION P.4. 292

The Plan shall provide a distribution list for the Plan, which will include all of those emergency support organizations who have a response role in implementing the Plan.

All agreements and procedures not integral to the plan must be available for review upon request.

1373 187

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

OFFICE OF THE
CHAIRMAN

September 4, 1979

The Honorable Douglas M. Costle
Administrator
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Mr. Costle: Doug,

Because of the accident at Three Mile Island, there has been increased attention by the Federal government and the States on the whole question of State and local radiological emergency response plans for fixed nuclear facilities. I am writing to ask for your support of our increased efforts in this area.

The Federal Preparedness Agency's Federal Register Notice of December 24, 1975 assigned various responsibilities to the Environmental Protection Agency as well as the Department of Energy, the Department of Transportation, the Department of Health, Education, and Welfare, and the agencies which are now consolidated as the Federal Emergency Management Agency (FEMA). Under the notice, the Nuclear Regulatory Commission has lead agency responsibility for review and concurrence in State plans, but this is a responsibility which we have never carried out alone.

In the past, we have relied on the efforts and technical competence of EPA individuals at the regional and headquarters levels in carrying out this task. It has been the collective expertise and hard work of all Federal agency participants, particularly at the regional level, which to date has allowed us to concur in the plans of twelve States. But, much work remains to be done.

Legislation is now pending in the Congress which would, if enacted, make concurrence in State plans a condition precedent to the operation of new commercial nuclear power plants. Under S.562, the Senate's version of NRC's 1980 Authorization Bill, unless States have concurred-in plans for dealing with radiological emergencies at nuclear power stations by June 1, 1980, NRC must close the facilities down. Under the Senate bill, NRC may not issue operating licenses for new facilities unless the application contains a copy of the concurred-in State plan.

Concurrence has not been achieved in sixteen States with operating nuclear power stations and there are twelve States where such stations are under construction or which are adjacent to nuclear power stations already operating or under construction. (See enclosed lists.)

1373 183

As you may know, NRC chairs the Federal Interagency Central Coordinating Committee on Radiological Emergency Response Planning. At the June meeting of this group, the members, including your representative, Mr. Floyd L. Galpin, again pledged support for the continuing Federal effort in this field, but they were quick to point out that they were not in a position to do anything more than exhort their regional offices to cooperate.

I should say that the cooperation we have had to date from the EPA regional staff has been very encouraging. But I would like to ask you now to underscore to your regional and headquarters management and staff who work in this area the urgency of this matter during the next year. Modest funding may also be required to support increased efforts and travel by regional personnel of EPA through the spring of 1980. Their participation in field assistance visits, plan reviews and critiques of exercises will be needed to an even greater degree than before to achieve final concurrence in the plans for the States not yet having concurrence.

I earnestly ask for your personal support and the support of your Agency for this important work.

Sincerely,

Joseph M. Hendrie
Chairman

Enclosure:
As stated

1373 189

12 STATES WITH PLANS HAVING NRC CONCURRENCE

Alabama
Arkansas
California
Connecticut
Delaware
Florida
Iowa
Kansas
New Jersey
New York
South Carolina
Washington

16 STATES WITH OPERATING NUCLEAR POWER STATIONS - DO NOT HAVE PLANS WITH NRC CONCURRENCE

Colorado
Georgia
Illinois
Maine
Maryland
Massachusetts
Michigan
Minnesota
Nebraska
North Carolina
Ohio
Oregon
Pennsylvania
Vermont
Virginia
Wisconsin

12 STATES WITH NUCLEAR POWER STATIONS UNDER CONSTRUCTION OR ADJACENT TO STATES WITH STATIONS UNDER CONSTRUCTION OR OPERATING - DO NOT HAVE PLANS WITH NRC CONCURRENCE

Missouri
New Hampshire
Rhode Island
West Virginia
Oklahoma
Tennessee
Arizona
Mississippi
Louisiana
Texas
Indiana
Kentucky

Adequacy and Acceptance of Emergency Planning Around Nuclear Facilities

[10 CFR Part 50]

AGENCY: U.S. Nuclear Regulatory Commission.

ACTION: Advance Notice of Proposed Rulemaking.

SUMMARY: The Nuclear Regulatory Commission is considering the adoption of additional regulations which will establish as conditions of power reactor operation increased emergency readiness for public protection in the vicinity of nuclear power reactors on the part of both the licensee and local and state authorities. The Commission is interested in receiving public comment on objectives for effective plans, acceptance criteria for State/local emergency plans, NRC concurrence in State and local plans as a requirement for issuance of an operating license or for continued operation of a nuclear facility, and coordination between the licensee plan and State and local plans. The Commission seeks written comments on what items should be included in the rule.

DATES: Comments are due no later than August 31, 1979.

ADDRESSES: Written comments concerning these issues should be submitted to the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, DC 20555.

FOR FURTHER INFORMATION CONTACT: Patricia A. Comella, Site Designation Branch, Office of Standards Development, Nuclear Regulatory Commission, Washington, DC 20555, 301-443-5981.

SUPPLEMENTARY INFORMATION: The NRC requires that power reactor license applicants plan for radiological emergencies within their plant sites and make arrangements with State and local organizations to respond to accidents that might have consequences beyond the site boundary. In this way off-site emergency planning has been related to the nuclear licensing process. *See* 10 CFR Part 50, Appendix E (1979), *see also* additional guidance in U.S. NRC, Regulatory Guide 1.101, "Emergency Planning for Nuclear Power Plants," (Rev. 1, 1977).

To aid State and local governments in the development and implementation of adequate emergency plans, the NRC, in conjunction with seven other Federal agencies, has attempted, on a cooperative and voluntary basis, to provide for training and instruction of State and local government personnel and to establish criteria to guide the preparation of emergency plans. However, the NRC has not made NRC approval of State and local emergency plans a condition of nuclear power plant operation.

The accident at Three Mile Island has raised a number of questions about the adequacy of radiological emergency response plans. Even before the accident the GAO had recommended that NRC not license new power plants for operation unless off-site emergency plans have been approved by the NRC. GAO, Report to the Congress, "Areas Around Nuclear Facilities Should Be Better Prepared For Radiological Emergencies," March 30, 1979. The Commission is also considering new guidance to State and local governments on emergency planning, based on an analysis of a joint NRC-EPA Task Force Report, "Planning Basis for Development of State and Local Government Radiological Emergency Response Plans in Support of Light Water Nuclear Power Plants," NUREG-0396/EPA 520/1-78-016, December 1978. *See* 43 Fed. Reg. 58658 (December 15, 1978), *see also* 44 Fed. Reg. 23137 (April 18, 1979). Furthermore, a number of organizations, including Critical Mass and Public Interest Research Groups, have renewed and supplemented a petition for rulemaking, previously denied by the Commission, concerning the operational details of evacuation planning. *See* 44 FR 32486 (June 6, 1979).

The Commission has decided to initiate an expedited rulemaking procedure on the subject of State and local emergency response plans and those of licensees. The Commission is soliciting public comments in this area, particularly on the following issues:

1. What should be the basic objectives of emergency planning?

a. To reduce public radiation exposure?

b. To prevent public radiation exposure?

c. To be able to evacuate the public?

To what extent should these objectives be quantified?

2. What constitutes an effective emergency response plan for State and local agencies? For licensees? What are the essential elements that must be included in an effective plan? Do existing NRC requirements for licensees (10 CFR Part 50, Appendix E) and guidance for States (NUREG-75/111) lack any of these essential elements?

3. Should NRC concurrence in the associated State and local emergency response plans be a requirement for continued operation of any nuclear power plant with an existing operating license? If so, when should this general requirement become effective?

4. Should prior NRC concurrence in the associated State and local emergency response plans be a requirement for the issuance of any new operating license for a nuclear power plant? If so, when should this general requirement become effective?

5. Should financial assistance be provided to State and local governments for radiological emergency response planning and preparedness? If so, to what extent and by what means? What should be the source of the funds?

6. Should radiological emergency response drills be a requirement? If so, under whose authority: Federal, State or local government? To what extent should Federal, State, and local governments, and licensees be required to participate?

7. How and to what extent should the public be informed, prior to any

emergency, concerning emergency actions it might be called upon to take?

8. What actions should be taken in response to the recommendations of the joint NRC/EPA Task Force Report (NUREG–0396/EPA 520/1–78–016)?

9. Under what circumstances and using what criteria should a licensee notify State, local, and Federal agencies of incidents, including emergencies? When, how, to what extent, and by whom should the public be notified of these incidents?

The comments received will be collected and evaluated by the NRC staff, which will, in turn, submit recommendations on proposed rules to the Commission. Based on the comments it receives from the public and the analysis of the problem presented by the NRC Staff, the Commission will determine whether to proceed with a proposed rule for notice and comment and/or whether to make such rule immediately effective. The Commission anticipates completion of this expedited rulemaking in approximately six months.

The NRC staff is presently conducting a comprehensive review of all aspects of the NRC emergency planning and preparedness program. Therefore, the Commission is also interested in receiving comments on all other aspects of emergency planning, including issues raised in the Critical Mass/PIRG petition for rulemaking and questions such as the following:

10. How and to what extent should the concerns of State and local governments be incorporated into Federal radiological emergency response planning?

11. How should Federal agencies interface with State and local governments and the licensee during emergencies?

12. Should the licensees be required to provide radiological emergency response training for State and local government personnel? If so, to what extent? Should the Federal government provide such training? If so, to what extent?

13. To what extent should reliance be placed on licensees for the assessment of the actual or potential consequences of an accident with regard to initiation of protective action? To what extent should this responsibility be borne by Federal, State or local governments?

14. Would public participation in radiological emergency response drills, including evacuation, serve a useful purpose? If so, what should be the extent of the public participation?

Dated at Washington, D.C., this 12th day of July, 1979.

For the Commission.

Samuel J. Chilk,

Secretary of the Commission.

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1373 192

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16. ABSTRACT (200 words or less)

On July 24-25, 1979, the Nuclear Regulatory Commission sponsored a training seminar for Federal officials involved in the review of State and local radiological emergency response plans. The major purpose of the seminar was to discuss the methods used to review the State response plans for accidents involving radioactive materials. The review criteria, as revised, are found in Appendix E.

17. KEY WORDS AND DOCUMENT ANALYSIS

17a. DESCRIPTORS

Radiological emergency response program
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1373 193

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1373 194