

Docket No. 50-289



DISTRIBUTION Docket File ORB#4 Rdg Memo File TNovak

THIS DOCUMENT CONTAINS
POOR QUALITY PAGES

MEMORANDUM FOR:

Darrell G. Eisenhut, Director, Division of Licensing
Denwood F. Ross, Director, Division of Systems Integration
Richard H. Vollmer, Director, Division of Engineering
Stephen S. Hanauer, Director, Division of Human Factors Safety
Thomas E. Murley, Director, Division of Safety Technology
Brian K. Grimas, Director, Division of Emergency Preparedness

. ROM:

Thomas M. Novak, Assistant Director for Operating Reactors, DL

SUBJECT:

TMI-1 RESTART OPEN ITEMS STATUS RELATED TO COMPLETION OF HEARING

The enclosed lists summarize all matters related to the TMI-1 restart hearing record and represent all of the estimated work load for the NRC staff to support the completion of the hearing record other than oral testimony. The effect of the Commission's Order CLI-81-3 dated March 23, 1981 has been reflected in the lists regarding the removal of financial qualification from the proceeding and the evaluation of TMI-1 as an operating reactor. We have grouped the issues into the following lists:

 Status of Open Items From the Commission's August 9, 1979 Order and March 6, 1980 Order.

19 Short-Term Items needing implementation prior to restart; 16 Long-Term Items needing "reasonable progress" evaluation prior to restart.

II. Status of Open NUREG-0737 Items Outside the Scope of the Commission's Orders (List 1) 20 NUREG-0737 items applicable to operating plants with required implementation dates occurring before October 1981 (estimated TM1-1 restart date).

Eight items previously required as NTOL items prior to the Commission's Order CLI-91-3 dated March 23, 1981 have also been listed for reference only. Six of these items are not required of other operating plants; two have dated requirements for operating plants occurring after October 1981.

III. Status of Hearing Open Items Outside of the Scope of the Commission's Orders or NUREG-0737 that need an Evaluation Report.

One Item

IV. Status of Contentions Requiring Additional Staff Prefiled Testimony Three remaining items

The immediate efforts involving your staff are to provide: (1) SFR inputs to DL for all of the items shown on Lists I and II and (2) testimony and other documents as identified in Lists III and IV. The Office Director indicated the high priority needed for the SER at his March 26, 1981 meeting with you. Here are the schedule targets:

- For items now under staff review for which we have not requested additional information from the licensee. (Status B or C) Submit SFR inputs to DL on or before April 2, 1981.
- Items for which an additional licensee submittal is expected before 4/10/81 to complete NRR SER (Status A), submit SER imputs to DL as soon as possible but no later than April 10, 1981.
- DL plans to issue a Supplement 3 to the SER, NURLG-0680, for List I items (Commissions Orders); and a separate SER for List II items (NUREG-0737). The issue date from DL to OELD for its concurrence will be on April 15, 1981.
- I'ems in Lists III and IV are to be issued or filed by the dates snown in the lists. Drafts should be submitted to OELD and D at least three days prior to those dates.

On some matters, the licensee's response may not be complete and will require some additional verification prior to restart. For these cases, we should the staff's position in order to provide a basis for the Board to close the hearing record on the items involved.

If your staff has any questions regarding your inputs, please call the

# Original algred by

Thomas M. Novak, Assistant Director for Operating Reactors Division of Licensing

cc w/enclosures: RTedescc GLainas SRamos JCutchin IV DSwanson

¿Tourtellotte DDilanni HSilver RJacobs RCapra JStolz MMcKenzie JSniezek (OIE) JO'Reilly (OIE RII) RCLewis (R&PI, RII)

Contacts:

CHRICE) ...

NEC FORM 318 00 801 NECT

H. Silver X28427 R. Jacobs X2977.4 C-ORB#4:DL JStoT2/cb 3/30/8 AD-OR: DL TNOYak 372, 1/81



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

March 31, 1981

Docket No. 50-289

MEMORANDUM FOR: Darrell G. Eisenhut, Director, Division of Licensing Derwood F. Ross, Director, Division of Systems Integration Richard H. Vollmer, Director, Division of Engineering Stephen S. Hanauer, Director, Division of Human Factors Safety Thomas E. Murley, Director, Division of Safety Technology Brian K. Grimes, Director, Division of Emergency Preparedness

FROM:

Thomas M. Novak, Assistant Director for Operating Reactors, DL

SUBJECT:

TMI-1 RESTART OPEN ITEMS STATUS RELATED TO COMPLETION OF HEARING

The enclosed lists summarize all matters related to the TMI-1 restart hearing record and represent all of the estimated work load for the NRC staff to support the completion of the hearing record other than oral testimony. The effect of the Commission's Order CLI-81-3 dated March 23, 1981 has been reflected in the lists regarding the removal of financial qualification from the proceeding and the evaluation of TMI-1 as an operating reactor. We have grouped the issues into the following lists:

1. Status of Open Items From the Commission's August 9, 1979 Order and March 6, 1980 Order.

19 Short-Term Items needing implementation prior to restart; 16 Long-Term Items needing "reasonable progress" evaluation prior to restart.

II. Status of Open NUREG-0737 Items Outside the Scope of the Commission's Orders 20 NUREG-0737 items applicable to operating plants with required impletentation dates occurring before October 1981 (estimated TMI-1 restart date).

Eight items proviously required as NIOL items prior to the Commission's Order CLI-81-3 dated March 23, 1981 have also been listed for reference only. Six of these items are not required of other operating plants; two have dated requirements for operating plants occurring after October 1981.

III. Status of Hearing Open Items Outside of the Scope of the Commission's

The immediate efforts involving your staff are to provide: (1) SER inputs to DL for all of the items shown on Lists I and II and (2) testimony and other documents as identified in Lists III and IV. The Office Director indicated the high priority needed for the SER at his March 26, 1981 meeting with you. Here are the schedule targets:

- For items row under staff review for which we have not requested additional information from the licensee. (Status B or C) Submit SER inputs to DL on or before April 2, 1981.
- Items for which an additional licensee submittal is expected before 4/10/81 to complete NRR SER (Status A), submit SER inputs to DL as soon as possible but no later than April 10, 1981.
- DL plans to issue a Supplement 3 to the SER, NURIG-0680, for List I items (Commissions Oriers); and a separate SER for List II items (NUREG-0737). The issue date from DL to OELD for its concurrence will be on April 15, 1981.
- Items in Lists III and IV are to be issued or filed by the dates shown in the lists. Drafts should be submitted to OELD and DL at least three days prior to those dates.

On some matters, the licensee's response may not be complete and will require some additional verification prior to restart. For these cases, we should provide the details of the staff's position and the steps needed to satisfy the staff's position in order to provide a basis for the Board to close the hearing record on the items involved.

If your staff has any questions regarding your inputs, please call the contacts listed.

Thomas M. Novak, Assistant Director for Operating Reactors

Division of Licensing

cc w/enclosures:

RTedesco GLainas SRamos JCutchin IV DSwanson JTourtellott≎ DDilanni HSilver RJacobs

JStolz MicKenzie JSniezek (DIE) JO'Reilly (DIE RII) ROLe is (R&PI RII)

Contacts:

H. Silver X28427 R. Jacobs X29 '4

s As Short Jern					
1100(2)	Item Description	Open Hem	licensee Submittal	NRR Review	Status (3)
Order Item 2 79-050-1	Matural Circulation	Analysis of S/G Fill	3/6/81	RSD-Complete	c I
79-058-5 (11.K.2.10)	Anticipatory Reactor Trip	RPS Checkout Procedure	W/SU Test Program	PTRB	B
79-058-7	Tech Specs	Tech Specs	4/15/31(1)	ORP#4 et al.	В +
Order Item 3	Emergency Preparedness	Test Exercise	6/81	DEP	В
Order Item 4	Separation of TMI-1 & TMI-2	ESF Filter System Design for Fuel Handlin Building	4/1/81 <sup>(1)</sup>	ETSB	Λ
Order Item 5	Waste Management	Solid Radwaste	3/13/81	ETSB-Due 3/25	В
Order Item 6	Management Capability	Low Activity Storage Q-List	3/81	QAB	8
Order Item s 2.1.1	Luergency Power Supply-Pzr. Level, Block Valves & PORV	Procedures	4/1/81(1)	OLB	Λ
2.1.3a (11.0.3)	Valve Position Indicator	Justification of two phase flow scasitivi'/	3/6/8)	RSB-Complete	C
2.1.35	ICC InstExisting Inst.	Analysis & Emergency IC	С	CPB,RSB,PTRB	В
(II.F.2)	New Inst., e.g. water level	Procedure Analysis, commitment, schedule, description		СРВ	B
2.1.4	Containment Isolation	Detailed design information, electrical schematics	3/81	CSB-reviewer has submitted un- approved draft PSB	B 3
2.1.6a (111.0.1.1)	System Integrity Outside Containment	Leakage measurement procedures, preventive maintenance program des	1/1/81 <sup>(1)</sup> cription	ETSR	۸

						100
A. SI				20.05	49. 生八	21 1
100	100.0	- PC 147	229 16	4 . 7. 2	13.32	13 4 7
114						

(2)	Item Description	Open Item	Licensee Submittal	NRR Review	Status <sup>(3</sup>
2.1.6b (11.0.2)	Plant Shielding	Design Report	4/1/81(1)	RAB	۸
2.1.7a (11.E.i.2)	AFW Auto Initiation	Tech Specs		ASB	c
2.1.8a (11.8.3)	Post Accident Sampling	Jesign review	3/6/81	CEB-reviewer has submitted un- appreved draft	В
2.1.8b (11.F.1)	Radiation Monitors	Long term design details, procedures; evaluations and procedures for short-term mods	4/1/81(1) (long term design only)	ETSB	Α
Z.1.8c (III.0.3.3)	Inplant Iodine	Procedures and Training	4/1/81(1)	RAB	٨
2,2,2b	Unsite TSC	Procedures	Complete	EPLB reviewer has submitted unapproved draft	В
B. Long Ter	<sub>nr</sub> (4)	Reasonable Progress Judgem	ent Required		
LT-1 (II.K.2.9)	ICS FMEA	SER Update	Complete	ICSB-Complete	c
1.1-2	SB Analysis	Additional generic information fm. B&W Owners Group	Complete	ORB#4, RSB	В
11-3 2.1.2 (II.0.1)	Category B Recommendations (4) RV & SV Testing (5)	SER Update	3/3/81	MEB	В
2.1.3b (11.5.2)	Install additional inst. for detection of ICC	SER Update	No commitment for compliance	CDB	В

B. long form (cont.)

1tem <sup>(2)</sup>	Item Description	Open Itea	Licensee Submittal	MRR Review	Status (3)
2,1,6b (11,6,2)	Plant Shielding <sup>(5)</sup>	SER Update	4/1/81 <sup>(1)</sup>	RAB	Α
2.1.7a (11.8.1.2)	AFM Auto Initiation	Safety grade mods design	4/1/81 <sup>(1)</sup> (partial)	P58	٨
2.1.7b (11,E,1.2)	APW Flow Indication	SER Update	No addt') info. required	PSB-due 3/25	В
2.1.8a (11.8.3)	Pest Accident Sampling	SER Update	No addt'l info. required	CEB-Reviewer has submitted unapproved draft	В
2.1.8b (11.5.1)	Radiation Monitors	SER Update	4/1/81 <sup>(1)</sup> (Long term design only)	5128	Α
2.1.9 (1.c.1)	Transients & Accidents a. SB LOCA b. ICC	SER Update SER Update: engoing review of ICC procedures	4/1/81 (1)	a. RSB,PTRR b. RSB generic item no reviewer	B A assigned
	c. Transients & Accidents	SER Update; ongoing review of ATOG	3/81	r. RSB-generic item, no reviewer PTRB	В
2.2.1h (1.A.1.1)	STA	SER Update	Rec <sup>1</sup> d 3/27/01	LQB	В
2,2,76	Onsite TSC	SER Update		EPLB	В
Addt'1 1, 2, 3 (11,F,1)	Containment Instruments	Detailed designs (submittal not required until 1/1/82)	Pressure & Water Level 4/1/81	CSB	Α
Add:1.4 (11.8.1)	RCS Venting	SER Update, detailed designs and analysis		RSB	В

#### I LOUND:

- (1) Under Licensee Submittal column, dates with this superscript were provided verbally on 3/20/81 as a preliminary response to 3/6/81 letter.
- (2) Under Item column, items are identified by Order number, where applicable, NUREG-0737 is included underneath the Order number.
- (3) (inder status column;
  - A Additional licensee submittal expected before 4/10/81 to complete MRR SER
  - B Licensce's submittal received, but NRR review not complete
  - C Approved input received from technical branches DL has sufficient information to prepare SER
- (4) Schedule for implementation to comply with Enclosure 1 of NOREG-0737. This supercedes Category 8 recommendations of  $NOP_{\rm eff}$  6-0578,
- (5) Under Item Description column, items with this superscript have additional requirements outside the scope of NUREG-0578 for which a reasonable progress judgement is not required.

# (i. BER REVIEW STATUS OF OPEN MURI G-0737 THIPS REQUIRED FOR RESTART (OCTOBER 1981) 3727/81 OUTSIDE THE SCOPE OF THE COMMISSION'S ORDERS

Hem No.	Description	Open Item	Licensee Submittal Reference/Date	NER Review Branch	Status*
1.A.3.1	Povise scope & criteria for licensing examine 1. simulator exams (fuel load)	Simulator exam to be given as start up approaches		OLB	В
1,0,5	Teedback of operating experience (1/1/81) or prior resuming OL	Need evaluation	TLL 392, 10/20/80	IME - Region II	В
1.0.6	Verify correct performance of operator activities	Update emergency procedures	R.R.3.1 Supp. 1 Part 1 Q53,54,58,60 Supp. 1 Fart 2 Q21 & 22	PTRB	В
11.8.4	Training for mitigating Core domag: 1. develop program 2. complete training program (full power)	Review & approve program determine the acceptability 10/1/8 a; completing the training	TLL 516, 10/8/80 TLL 018, 1/21/81	DHFS	СВ
II.E.4.2	Containment Isolation 1. Containment pressure set point 2. Radiation signal on purge	Evaluate Licensee's submittal	R.R.2.1.1.5 R.R.2.1.1.5	CSB	В
	valve 3. Tech Spec		4/1/81(1)		٨
11,K.2.13	Thermal Mechanical Report (fuel load)	Thermal shock to RV from SI	TLL 022, 2/23/81	RSB	В
11.K.*.14	Lift Frequency of the PORV & Safety Valves (Full power)	Complete evaluation		RAB/DST	В
11.8.2.16	RCP Seal Damage Studies (full power) (other ORs have completed	Complete evaluation	TLL 285, 6/20/90	RSB	В

11. DEC REVIEW STATUS OF OPEN NUREG-0737 LITTES REQUIRED FOR RESTART (OCTOBER 1981) 3/27/31 UNITSIDE THE SCOPE OF THE COMMISSION'S ORDERS

Hem No.	Description	Open Item	Licensee Submittal Reference/Date	NRR Review Branch Stat	uer*
11.K.3.1	Auto Isolation of PORV A. Design	Evaluate design sub- mittal of PORV/Block valve system	7/1/81 <sup>(1)</sup>	1CSB/DS1	B
11.8.3.2	Report on PORV Failure	Need Failure History	4/3/81 <sup>(1)</sup>	RRAB/DST	Α
11,8,3,3	Report Safety & Relief Valve Challanges & Failures (4 mo. before OL is issued)	Complete evaluation	TLL 392, 10/20/80 TLL 028, 1/18/80	ORAB	В
11.K.3.7	Evaluation of PORV Open Probability	Evaluate the licen- see's submittal, (licensee isn't responsive)	4/3/81(1)	RRAB/DST	۸
11.8.3.17	Report ECC. Outage History	Historical records		RRAB/DST	R
11.8,3.30	Review SB LOCA Methods Based on 10 CFP Part 50 A Schedule Octline	Evaluate adequacy of schedule	10/20/80	RSB	В
111.A.1.2	Upgrade Emergency Support Facilities 1. Design	Submit Design	No Commitment	EPLB	8
111.A.2	Emergency Preparedness 1. Upgrade emergency pre- paredness App. E 10 CFR 50	See Attachment to List IV	R.R. Section 4.0 ILL 549, 11/3/80 ILL 618, 12/10/PG ILL 549, 11/3/80, Q22	EPLB	В
111.0.3 4	Control Room Habitability 1. Review	Evaluate licensee' response		MEB	В

# 11. PREVIOUS NICE TIEMS WITH DATED REQUIREMENTS FOR OPERATING PLANTS OCCURRING AFTER OCTOBER 1981 - 3/27/25

Item No.	Description	Open Item	Licensee Submittal Reference/Date	NRR Review Branch	Status*
1.A.1.3	Shift Manning (2) Min. Shift Crew (fuel load)	Licensee compliance is contineent upon personnel retention & outcome of NRC exam	TLL 322, 10/20/80 TLL 655, 12/19/80	LQB	R
1.0.1	Control Room Design Review Prior to Startup	Update NUREG-0752 Control Room Design Review e.g. remote shutdown panel; backu display from incore I/C's	TLL 346, 7,14/80	HFEB	В

Item No.	Description	Open Item	Licensee Submittal Reference/Date	NRR Review Branch	_Status*
1.0.7	NSS Vendor Review & Procedures 1. low power test program (fuel- load) 2. power ascension & emergency procedures	Complete Evaluation		HFS/PTRB - D. Ziemann	В
1,0,8	Monitoring of Selected Emergency Procedures for NTOL (full power)		2/28/81	HFS/PTRB - D. Ziemann	В
1.6.1	Pre-op & Low Power Training 1. propose test (fuel load) 2. submit analysis (fuel load) 3. training & results (fuel load)	Part of the startup program []		HFS/PIRB - D. Ziemann	В

<sup>\* -</sup> A - Additional licensee's submittal expected before 4/10/81 to complete NRR's SER

R - Licensee's submittal received but MRR review not complete

C - Approved input received from the Technical Branches - DL has sufficient information to prepare SER

<sup>(1)</sup> Under Licensee Submittal column, dates with this superscript were provided verbally on 3/20/81 as a preliminary response to 3/6/81 letter.

111. STATUS OF HEARING OPEN TIENS OUTSIDE OF SCORE OF DROFRS OR HEREG-0737 THAT MEED AN EVALUATION REPORT

Contention	Item Description	Open Item	Licensee Submittal	NRR Review	Status
	Environmental Impact Appraisal	P. Gilbert completion of environmental imp	Mone	None	Draft in review, scheduled for filing 3/31

# IV. COMBINITORS REQUIRING ADDITIONAL STAFF PRESERVED TESTINOMY

Construction	Subject	Staff Wilness/festimony	Input Needed Lo NRC	Stafus
UCS-12	Environmental Qualification	Zoltan Rostoczy	None	Add'l Testimony by 4/3
Sholly-15 ANGRY-V(c)	Control Room Design Review	Rami rez/IMREG-0752	None	Testimony scheduled for 4/10
fiany	Emergency Proparedness	Chestnat-offsite/onsite Grime: -offsite/onsite FFMA - offsite	See attachment to List IV	See attachment to list IV

#### TMI-1 Emergency Planning

#### 1. ONSITE

- Staff's SER (12/10/80) filed and admitted into evidence on adequacy of onsite/licensee planning.
- Staff's written testimony addresses all onsite contentions.
- Unresolved items have been identified as follows:
  - (a) Prompt Warning/Alerting System (SER p. 30; 2/9 Testimony, p. 83).
  - (b) Public Education & Information Program details on methods of distribution, adequacy of materials, coverage of residents and transients and schedule for and frequency of distribution (SER, p. 30; 2/9 Testimony, pp. 83-84).
  - (c) Accident Assessment: (i) specify instrumentation for accident assessment required by NUREG-0578 and 8/9/79 Order (SER p. 30); (ii) determine more exact assumptions for containment leak rate based on actual leak rate test data and pressure (SER p. 30; 2/9 testimony, p. 84).
  - (d) Protective Response: (i) evacuation time estimates (SER p. 30; 2/9 testimony p. 84); (ii) Provisions for distributing thyroid blocking drugs to ensite workers (SER p. 30).
  - (e) Exercises & Drills: increase frequency of communications links tests to quarterly (SER r. 30).
  - (f) Manning of Emergency Facilities: provide for stationing of a senior manager acting as EGF director within one hour of decision to activate EOF by 9/1/81 (2/9 testimony, p. 84).
  - (g) EALs: modify EALs on 300 #Ci/ml Iodine equivalent for Alert category and boundary dose rate for General Energency (2/9 testimony, p. 84).

### Matters No Yet Addressed

ND680 (Restart SER) Supp. 1. Appendix B, pp. 25-29 "Emergency Plan Implementation" identifies 30 problem areas in licensee's elergency pranning from the health physics appraisal of summer 1980. 18E has found problems resolved.

[Donaldson should be able to address sinte he was a signatory to the IRE closeout report. Maybe he can address when he testifies on his written emergency planning testimony via supplemental direct testimony in response to a short question about resolution of the 30 items.]

ADDRESS: when Donaldson testifies on his written EP testimony

- 1/27/81 I&E Report on information flow during TMI-2 accident recommends that licensee EP & EPIPs specifically address:
  - (a) assignment of specific responsibilities for accumulating, recording and displaying information.
  - (b) assignment of specific responsibilities for dissemination of information to evaluators and to communicators.
  - (c) assignment of specific responsibilities for communicating pertinent information and evaluation of significance of information to offsite groups.
  - (d) specification of information to be reported and those responsible for reporting.

Testimony is needed on the resolution of these matters.

ADDRESS: probably should be done in testimony on 3/24.

Staff position on evacuation time study.

ADDRESS: Testimony is needed on adequacy of study and compliance with NUREG-0654. It appears this matter can be addressed during hearing sessions on offsite issues about mid-April. If this addressed, should closeout unresolved item (d)(i) listed above.

followup on resolution of unresolved items identified as (a)-(g) above.

ADDRESS: It is not known when these matters can be addressed. Presumably as resolution is obtained, we will be prepared to testify orally on resolution.

> Implementation of licensee's EP - determinations on implementation should be presented.

Whether this can be addressed at the hearing and when depends on the schedule for the implementation inspection, now projected for May or June. Presumably we could address implementability in testimony within about 2-3 weeks from the implementation inspection.

#### 2. OFFSITE

- FEMA and joint NRC/FEMA testimuny covers all offsite contentions except ECNP 2-33 (EP-11) and Newberry York 10 (EP-14J).
- Testimony contains a partial identification of unresolved items as follows:
  - (a) Evacuation time study consistent with NUREG-0654 should be given to and used by the State (2/23 Testimony p. 10; 3/16 testimony, p. 7).
  - (b) Prompt notification system and knowledge of time required to alert the public are lacking and constitute planning deficiencies. Licensee's prompt notification system report should be submitted to FEMA for review. (2/23 testimony p. 18, 19; 3/16 testimony p. 11). York County EP is deficient with regard to prompt notification system (3/16 testimony, p. 15).
  - (c) York County EP is inconsistent with State EP with regard to the distribution of thyroid blocking agents. (2/23 testimony, p. 39).
  - (d) York EP deficient in its failure to include transient and work force populations in its population calculations. (3/16 testimony p. 6).
  - (e) York EP deficient absent an evacuation time estimate accounting for transients and proving out the planned evacuation routes. (3/16 testimony p. 7).
  - (f) Posting of emergency protection information, including evacuation routes, is not provided for in York County EP. (3/16 testimony, p. 12).
  - (g) State level public information program only now being developed and not yet implemented. (3/15 testimony, p. 13).
  - (h) Letter of Agricament from York County Races, Inc. should be provided and included in the York EP. (3/16 testimony p. 22).
  - (i) York EP makes no provision for local and hospital and modical services for persons exposed to radiation. (3/16 testimony p. 27). State Department of Health has not yet assumed proparation for handling contaminated persons and York EP should reflect State DOH provisions when they are in place. (5/12 testimony pp. 27-28).

- (j) Letters of agreement between York County and Red Cross, amateur radio operators, school districts, York Area Invalut Authority, Adams County and the York Chamber of Commerce should be provided in York EP. (3/16 testimony, pp. 29-30, pp. 35-36).
- (k) York EP deficient in failure to list homebounds and invalids and prepare for their case. (3/16 testimony, pp. 30-31).
- York EP must reference and provide for equipment recessary for monitoring in support of fire, mass care and decontamination operations. (3/15 testimony pp. 31, 33).
- (m) York EP should provide for a system to utilize transportation resources in an evacuation. (3/16 testimony pp. 34-35).
- (n) Municipal plans providing for evacuation of homobounds and invalids, a responsibility placed on runicipalities by the York EP, are not available. (3/16 testimony, pp. 44-45). It is not known whether needs for evacuating homobounds/invalids exceed recourses. (3/16 testimony pp. 44, 53).
- (o) All county plans should provide for backup or substitute EMA coordinators (3/16 testimony p. 49).
- (p) Evacuation plans should be upgraded to account for problems identified in the evacuation time study. (3/16 testimony p. 55).
- (q) York EP must be revised to include a listing of school evacuation plans and preparation of school evacuation and bus rerouting plans must be completed. (3/16 testimony pp. 56-57).
- (r) School planning on actions of bus drivers if, during husing children home in an Alert, conditions worsen, should be completed or children should not be bussed during an Alert. (3/15 testimony, pp. 57-58).
- (s) Dauphin Count, school evacuation planning should provide for early notification of bus drivers by school officials and for school bus use from beyond the EPZ. Also, County Transportation Officer should be responsible for notification and activation of planned transportation resources for Dauphin County. (3/16 testimony p. 50).
- (t) For protective actions, unique groups requiring special provisions (e.g. Old Order Anish within phone 200) should be identified and special provisions for above protection date. (3/16 testimany pp. 52-63).

- (u) Adequate evacuation time estimates should be factored noto State and licensee EPs before restart. (3/16 joint testimony p. 6).
- (v) Public education program still under development by licensee/ State/local organizations. Further details on frequency and schedule of distribution, means for educating transients must be provided. (3/16 joint testimony pp. 9-10).
- (w) Development of training programs for non-licensee personnel should be completed and initial training of such persons completed before restart. (3/16 joint testimony, p. 16).

#### Matters Not Yet Addressed

- FEMA response to Newberry York 10 (CP-143).

ADDRESS: In supplemental direct testimony by Adler/Bath panel.

- FEMA findings/determinations on the adequacy of offsite preparedness (1/81 "status report" from FEMA resulted in a conclusion that offsite planning is at a developmental stage and could reach no conclusion on adequacy) have been made and such findings/determinations have not even been requested by NRC yet. (Staff must get that request for findings and determinations out quickly.)

ADDRESS: Staff should request that the FEMA findings and determinations be provided by 5/15/81.

- FEMA's position on the adequacy of the plume EPZ that is proposed.

ADDRESS: In the findings/determinations.

- FEMA's position on the adequacy of the prompt notification system that is proposed (licensee's report to be provided 4/15/81).

ADDRESS: In the findings/determinations.

- Resolution of the unresolved items identifies in the written testimony and in firdings/determinations.

ADDRESS: Definite time when those matters can be addressed is unknown.

Presumably, individual unresolved items can be addressed as resolution is obtained.

# 3. OVERALL INTEGRATED EMERGENCY PREPAREDNESS

#### Matters Not Yet Addressed

 NRC Staff's determination of the adequacy of overall emergency preparedness - cannot be addressed until FEMA finding/determinations on adequacy of offiste preparedness are made available.

ADDRESS: In EP SER Supp. to be issued 2 weeks after FEMA findings/ determinations are provided.

## 4. FULL SCALE EXERCISE REQUIRED BY COMMISSION'S 8/9/79 ORDER

- Exercise schedule for 6/2/81. Holding the exercise will in and of itself satisfy the 8/9/79 Order.