

AUG 9 1979

MEMORANDUM FOR: Chairman Hendrie  
Commissioner Gilinsky  
Commissioner Kennedy  
Commissioner Bradford  
Commissioner Ahearne

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THRU: Lee V. Gossick  
Executive Director for Operations

FROM: Thomas F. Carter, Jr., Chairman  
Task Force on Emergency Planning

SUBJECT: FINAL REPORT OF TASK FORCE ON EMERGENCY PLANNING

The Task Force on Emergency Planning, which was established by the Commission in its meeting of June 7, 1979, was given three general responsibilities: (1) develop for Commission consideration a list of major issues for rule-making; (2) describe and objectively critique NRC's current emergency planning process; and (3) define and recommend an approach for developing a comprehensive plan that would formulate the scope, direction, and pace for NRC's overall emergency planning activities. (Specific responsibilities were delineated in a memorandum from Lee V. Gossick dated June 11, 1979, and in a SECY memorandum dated June 12, 1979.) Enclosure 1 lists members of the Task Force and a supporting Working Group.

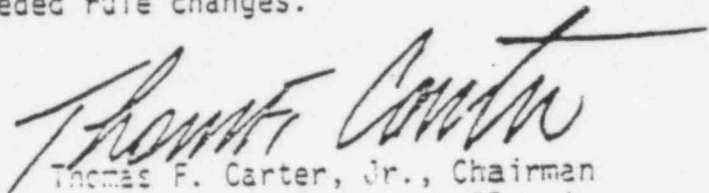
The Task Force has completed its assigned responsibilities, and herewith is reporting the results of its activities. The list of major issues developed by the Task Force was sent to the Commission via memorandum of June 19, and a discussion of each of the major issues was sent on July 17. The description and critique of the current emergency planning process, which was discussed during a Commission briefing held on June 28, is summarized in Enclosure 2. The critique produced an extensive set of problem topics, which are also set forth in Enclosure 2. The comprehensive action plan (Enclosure 3) presents staff plans for resolving the problem topics contained in Enclosure 2.

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M. T. Jamgochian (SD), in consultation with all program offices, has prepared drafts of proposed amendments to NRC regulations in order to resolve many of the problems that have recently surfaced in the emergency preparedness area (Enclosure 4). The Task Force members, recognizing that the specific language of the proposed regulations must be carefully assessed, unanimously support the basic principles presented in Mr. Jamgochian's proposed changes. Since State/local plan concurrence is to be a key factor in the proposed regulation changes and will impact on the decision to issue a license, serious consideration must be given to how this concurrence process is integrated into the responsibility of the licensing office. Early comments and suggestions from the Commissioners on these proposed amendments would be helpful to SD in promoting rapid development of the needed rule changes.



Thomas F. Carter, Jr., Chairman  
Task Force on Emergency Planning

Enclosures:

1. List of Members-Task Force and Working Group
2. Description & Critique of NRC's Current Emergency Preparedness Process
3. Comprehensive Action Plan
4. Draft Proposed Amendments to 10 CFR Part 50

cc w/enclosures:

- L. Bickwit, OGC
- S. Chilk, SECY
- A. Kenneke, OPE

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Enclosure 1

Task Force on Emergency Planning

Members

T. Carter, NMSS  
H. Collins, SP  
P. Cumella, SD  
J. Durst, RES  
B. Grimes, NRR  
J. Hegner, IE  
W. Houston, NRR  
M. Jamgochian, SD  
J. Long, NMSS  
M. Sanders, SP  
J. Sniezek, IE  
D. Thompson, IE  
R. Voegeli, ELD

Working Group

C. South, Group Leader, NMSS  
R. DeFayette, SP  
J. Dukes, SP  
J. Durst, RES  
F. Fisher, NMSS  
H. Gaut, SP  
J. Hegner, IE  
G. Kligfield, NMSS  
F. Lomax, NMSS  
R. Priebe, NRR  
M. Sanders, SP  
J. Sears, NRR  
J. Sniezek, IE

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## Enclosure 2

### DESCRIPTION AND CRITIQUE OF NRC'S CURRENT EMERGENCY PREPAREDNESS PROCESS\*

As a basis for future emergency planning activities, NRC's current emergency preparedness process was systematically described and analyzed for deficiencies or potential weaknesses. The description and critiquing were done by a separate working group consisting of representatives from NRR, NMSS, IE, and SP. Task Force members further refined the working group's product of 30 problem topics and used these problem topics to prepare action plans for individual NRC offices.

#### Description of Current Emergency Preparedness Process

To achieve an orderly and systematic description of NRC's emergency preparedness activities and to provide a means for an objective critique of that process, the working group developed a three-dimensional (4 x 4 x 7) matrix containing 112 cells. One dimension of the matrix represented the classes of participants in the radiological emergency preparedness process: (a) NRC; (b) Licensees; (c) State and local agencies; and (d) Other Federal agencies. The second dimension represented the various phases of emergency preparedness: (a) Planning; (b) Licensing; (c) Implementation and testing; and (d) Actual emergency response. The third dimension consisted of the following factors: (a) Responsibilities; (b) Limitations; (c) Objectives; (d) Activities (expenditure of resources); (e) Products, goods, and services; (f) Organization (the entity performing the activities and/or delivering the products for the particular cell under consideration); and (g) Interfaces.

Use of this methodology forced a disciplined consideration of the entire emergency preparedness process. Each cell of the matrix was filled in only after detailed

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\*The Task Force uses the term 'Emergency Preparedness' in preference to the term 'Emergency Planning' because emergency preparedness connotes the whole of planning, implementation, and execution.

and sometimes lengthy discussion among members of the working group. Time constraints necessitated use of capsulized descriptions within the cells that were intelligible to members of the working group but would not be very meaningful to outsiders. (Meaningful description of a cell's contents would require two or three pages of text, and time was not available for preparing such a document.)

### Objective Critique of Current Process

Upon completion of the matrix describing the current emergency preparedness process, members of the working group proceeded to examine each of the cells for deficiencies and weaknesses. This analysis produced a list of 30 problem topics that, for ease of discussion, were grouped in six areas. Problem areas were: (a) Responsibility and Authority; (b) The Planning Process; (c) Regulations and Guidance; (d) Licensing; (e) Implementation; and (f) Testing and Verification of Capability.

The list of problem topics was valuable to the Task Force not only because of the systematic basis upon which it was prepared but also because the members of the working group were able to agree on the wording of the problem topics and the supporting descriptions.

### Subsequent Use of Problem Topics

Given the list of problem topics developed by the working group, the Task Force members modified the problem wording and descriptions in accordance with their own perceptions, and proceeded to define an approach to resolving the problems. Some problems were believed capable of resolution in the short term (six months or less). Others were seen as taking longer than six months. Still others were identified as amenable to both short- and long-term resolution; that is, some of the identifiable tasks could be done quickly whereas other tasks that were part of the same problem would take considerably longer to achieve.

On the following list of problem topics a notation indicates whether the Task Force believes the problem can be solved entirely in the short term, partly in the short term, or will require a longer time for resolution. The list also identifies offices having lead and support roles in effecting resolution of each of the problem topics. Office "Action Plans" were prepared to describe how the problems would be resolved. For any given problem topic, a look at the action plan for the lead office should indicate how that office expects to effect the resolution. Office action plans are contained in Section VI of the NRC Action Plan.

In the listing that follows, each problem area is identified by a letter (A through F). Within each area, each problem topic is identified by a number prefixed by the letter for the area within which it falls, thus: A-1, A-2, etc.

#### Listing of Problem Topics

##### A - Responsibility/Authority

Six problem topics were identified in this important area of emergency planning and response. Some of the problems in other problem areas derive from omissions or lack of effective mechanisms described here. In fact, some of those problems may not be amenable to solution unless these are corrected first, or at least concurrently.

A-1 - FRPPNE\* should be clarified                      Resolution: Long term  
with respect to NRC's                                      Lead:                      SP  
statutory responsibilities.                                Support:                NRR/NMSS/IE

Under the FRPPNE\* division of authority for control of Federal response at a licensed nuclear facility, the NRC leadership role is reduced to support status as soon as offsite casualties or widespread contamination occur. The logic for this choice is that the agencies having resources required to control and mitigate the consequences of a disaster can best manage the total Federal response to an emergency.

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It may be, however, that the explicit and implicit concerns for the public health and safety contained in the Atomic Energy Act would require NRC to maintain

\* The FRPPNE (Federal Response Plan for Peacetime Nuclear Emergencies) was promulgated by the Federal Preparedness Agency (now part of FEMA) in April 1977 as interim guidance to Federal agencies in the revision of existing plans and the preparation of any required new plans. It is guidance for peacetime nuclear emergency response planning. It is not a Federal response plan, per se. It has not been issued as permanent guidance. With one exception, the planning called for by NRC in the FRPPNE has been done or continues to be done. The exception calls for an NRC plan to respond to a "Category III" incident where there is widespread radioactive contamination at a licensed nuclear facility in a remote area with limited casualties but significant property damage.

continuing control of many aspects of emergency operations at a licensed nuclear facility, even after offsite contamination and casualties have occurred.

A-2 - Formal arrangements are ill-defined for interagency (Federal, State, and local) coordination. The process currently is on a voluntary basis.

Resolution:	Short and long term
Lead (FRPPNE):	SP
Support (FRPPNE):	IE
Lead (IRAP):	IE
Support (IRAP):	NRR/NMSS/SP

Federal agencies recognize the supremacy of State and local governments to direct emergency response efforts within their jurisdictions. Those Federal agencies preparing emergency response plans, rules, and regulations have routinely ensured that those documents reflect the prerogatives of State and local authorities.

Moreover, the integrated Federal emergency response program as it exists today gives an almost similar sovereignty to the prerogatives and authorities of the Federal agencies who cooperate in the emergency planning. Hence, the limits of cooperation, coordination, and designation of resources in the planning stage is essentially limited by the decision of each agency.

The primacy of State and local authority in planning for emergency response will (and should) continue to exist, even though it consumes planning resources and complicates national planning.

If the national emergency preparedness effort is to be effective, it must be based on more compulsive legislative mandate that assigns authority and responsibility so that the traditional prerogatives and jurisdictions of individual Federal agencies do not limit the ultimate effectiveness of the plan.

A-3 - There is no integrated Federal mechanism for the funding of State and local agencies to support radiological emergency preparedness.

Resolution:	Short and long term
Lead:	SP
Support:	N/A

Other Federal agencies expend resources in assisting, and granting funds for, State and local agencies' general emergency planning. NRC expends resources, not yet including grant funds, to provide assistance to State and local agencies for radiological emergency preparedness. There is no Federal mechanism for integrating NRC's effort with the other resource expenditure efforts.

A-4 - Radiological Emergency Response                      Resolution: Long term  
Planning for transportation                      Lead: NMSS  
accidents is inadequate.                      Support: IE/SP/SD

Because of the split and overlap of authority of the NRC and other agencies that regulate inter- and intrastate transport of licensed nuclear materials, there is no clear designation of responsibility for emergency preparedness functions. This situation is complicated by the fact that shipments involve licensed shippers and receivers, government shippers and receivers, and unlicensed carriers. This subject has been discussed in detail in a 1979 GAO draft report, "Nuclear Materials Transportation: Federal Actions Are Needed to Improve Safety and Security."

A-5 - NRC has not adequately defined its                      Resolution: Short term  
role in emergency response.                      Lead: IE  
Support: NRR/NMSS/SP/EDO

NRC's role has not been defined in NRC Manual Chapter 0502. The range of response role from monitoring to operational control was only implicitly addressed in NRC planning and procedures prior to TMI. NRC's response during TMI was an ad hoc response based upon a perceived role.

A-6 - The licensee's responsibility                      Resolution: Short term  
exceeds his authority with                      Lead: NRR/NMSS  
respect to offsite emergency                      Support: IE/S  
planning.

NRC requires the licensee's plans to provide reasonable assurance that appropriate protective measures can and will be taken to protect the public health and safety. Because neither NRC nor the licensee has authority over offsite resources (even though the licensee may donate equipment and training), the planning process between the licensee and Federal/State/Local agencies is voluntary, unenforceable by NRC or the licensee on Federal, State, and local



agencies and difficult to validate.

B - Planning Process

Six problem topics were identified in the area of the planning process for identifying, developing, or providing emergency planning products, goods, or services. These are, for the most part, internal to NRC; however, some affect--or are affected--by other agencies.

B-1 - For the emergency planning process, no effective mechanism exists within NRC for assuring consistency and the integration of guidance, i.e., the effort is currently fragmented.

Resolution: Short term  
Lead: EDO  
Support: All offices

Emergency planning cuts across several NRC office lines during the process of generating guidance to licensees and others. However, there are no effective NRC-wide procedures in place or organizational arrangements established to ensure that adequate and clear guidance results. This lack is particularly important in view of the many interfaces involved, including the licensee, State, local, and other Federal agencies.

Currently, several organizations within the NRC can and do issue guidance to licensees without the required knowledge of or concurrence by all other interested organizations before the fact. This includes NRR, NMSS, SD, and IE. Also, SP does the same for other than licensee organizations/agencies. Although informal internal coordination among interested parties is practiced, it is by no means certain that all coordination that is needed is performed. Since some of the coordination is verbal, it is not easy to observe or reconstruct.

B-2 - NRC Incident Response Program needs expansion and further development.

Resolution: Short and long term  
Lead: IE  
Support: NRR/NMSS/SP

Section 0502-01, Coverage, states "Guidance required for national level emergency planning is not currently included in this chapter. With modification,

the scope of the incident response program can be broadened to include such events." Such a modification is in order to make Chapter 0502 responsive to the post TMI environment and current NRC needs.

In addition to the above, the incomplete or delinquent parts of the NRC Incident Response Program should be provided. Not all procedures or data required have been supplied to date.

B-3 - The licensee's planning is based on accidents of severity up to and including the most serious design basis accidents.

Resolution: Short and long term  
Lead: NRR/NMSS  
Support: IE/SP/SD

Prior to TMI there was no explicit recognition given to Class 9 accidents in the emergency planning process. TMI highlighted the question whether NRC should require emergency planning for Class 9 accidents.

B-4 - The NRC responsibilities delineated in FRPPNE\* have not been implemented within the NRC.

Resolution: Long term  
Lead: SP  
Support: NRR/NMSS/IE/EDO

The Federal Response Plan for Peacetime Nuclear Emergencies (FRPPNE)\* identifies the NRC as an Operational Response Planning Agency (ORPA) for two categories of peacetime nuclear emergencies (PNE's) from a comprehensive set of four categories of such emergencies. The ORPA responsibilities are to:

- (a) Determine the complete list of Federal and private supporting agencies and enlist their assistance.
- (b) Provide guidance, peculiar to the operational response planning agency(s) type of PNE, for use by appropriate Federal support agencies. This guidance should include assumptions and casualty and property damage estimates that can be used as a standard data base for planning.
- (c) Ensure that all functions essential to an effective response are included in the planning for which the operational planning agency has the lead responsibility. These functions should include the

\* See footnote on page 3.

technical ones, required to assess, counteract, and control the radiological effects; the humanitarian ones, designed to minimize the impact on individuals; and the recovery ones, directed at restoring essential services to the affected area.

NOTE: The functions included in the above responsibilities include but are not limited to these: notification, communication, evaluation, decision making, public information, law enforcement, health and safety services, survival operations, international relations, and short term recovery operations.

B-5 - The need for research or studies in the emergency response area has not been comprehensively evaluated.

Resolution: Short term  
Lead: SP  
Support: All staff offices

NRC has sponsored a modest research/study program in areas related to emergency planning and response. However, it should be determined if additional efforts are needed to validate our current planning and response concepts.

B-6 - NRC has no control over other agency resources assigned to the Regional Advisory Committees (RAC's).

Resolution: Long term  
Lead: SP  
Support: IE

The resources that other agencies supply to the 10 RAC's are determined by them and are offered on a limited time basis. Therefore, the scheduling and coordination that ensues is captive to a voluntary and uncertain set of circumstances that can produce variable results affecting quality of output. It is not clear that NRC's requirements will be met under this voluntary arrangement. Similarly, NRC's own representation to the RAC's is extremely limited and on an additional duty basis.

C - Regulations and Guidance

Problems exist in the areas of both regulations and regulatory guidance. Regulations are incomplete in some parts, and guidance is inadequate in terms of the lack of acceptance criteria and the frequent use of other

than Regulatory Guides as a source of licensee guidance.

C-1 - NRC emergency planning guidance needs improvement.

Resolution: Short and long term  
Lead (Licensee): NRR/NMSS  
Support (Licensee): All staff offices  
Lead (State/local): SP  
Support (State/local): All staff offices

- (a) It does not necessarily contain specific NRC acceptance criteria;
- (b) it is not restricted to that which is needed for implementing the NRC position as defined in Regulatory Guides (e.g., branch technical positions, bulletins, circulars, generic letters, etc.).

While acceptance criteria can be developed for strictly licensee functions, there is a question whether the term "acceptance criteria" is applicable to the offsite elements of the emergency plan.

Because of the uncertainties rooted in the lack of criteria for an emergency plan, most of the offsite elements of a licensee's plan are generated in a quasi-regulatory atmosphere.

The draft of revised Regulatory Guide 1.89 on qualification of equipment to radiation source terms should be issued.

C-2 - Regulations have voids or inconsistencies related to emergency planning.

Resolution: Long term  
Lead: SD  
Support: NRR/NMSS/IE/SP

Part 50, Appendix E, requirements have not been applied to research reactors licensed prior to its adoption.

Part 30 does not require emergency plans or procedures.

Part 40 does not require emergency plans.

Part 70 does not require all licensees to have approved emergency response plans. There is no requirement that emergency plans be kept up to date.

C-3 - Protective Action Guides have not been promulgated as official Federal guidance.

Resolution: Short term  
Lead: SP  
Support: N/A

If Protective Action Guides (PAG's) were promulgated as official guidance from the Federal government, it is likely that PAG's would be more uniformly adopted and implemented by all parties involved.

D - Licensing

Four problem areas exist in licensing to meet radiological emergencies. Three of these relate principally to the capabilities and degree of commitment of resources external to the site for use during emergencies. The fourth addresses the problem of NRC interaction with the public, during the licensing process, without a well-defined generic basis for response.

D-1 - During the licensing process, NRC does not fully assess actual offsite capability but limits examination to the pledges of resources.

Resolution: Short term  
Lead: NRR/NMSS  
Support: IE/SP/EDO

The licensing of facilities to assure an adequate response to nuclear emergencies may include field trips by NRR/NMSS to discuss the capabilities available offsite in addition to IE's perspective of such capabilities. These may take the form of assessments or evaluations of these resources, at least in the numbers, types, training curricula, etc., but normally do not include a comprehensive assessment of resources likely to be brought to bear. As such, the actual capability available is not known in very great detail either before or after a license is granted.

D-2 - The NRC "concurrence" related to State plans is not directly related to the licensing process.

Resolution: Short term  
Lead: SP  
Support: NRR/NMSS

Present concurrence in State plans by NRC is neither necessary nor sufficient for the licensing decision-making process.

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D-3 - The assistance to States is not formally coupled to the licensing process.

Resolution: Long term  
Lead: SP  
Support: NRC/NMSS

The planning assistance that NRC provides to States, though small currently, is not necessarily targeted to support NRC requirements as articulated via the licensee's emergency response plan approved by the NRC. Though the resources may be applied to desired areas, there is presently no way to assure that this occurs.

D-4 - Because of the lack of a generic treatment of emergency planning issues in public hearings, the same contentions repeatedly occur in public proceedings and place an undue burden on the staff.

Resolution: Long term  
Lead: SD  
Support: NRR/NMSS

Possibly because of a lack of earlier research in the emergency planning and response area or for other reasons, a generic focus of the issues for use in rulemaking proceedings does not exist. Because of this lack of focus, the staff finds itself going over the same items time after time, which is wasteful of scarce resources as well as distracting to the long-term effort.

E - Implementation

This area held the most problems of all, a total of eight. They cover the range from interagency coordination to the pre-positioning and training of NRC resources. Other problem topics include facility and equipment support and timely notification of NRC that an emergency situation exists or is developing.

E-1 - Insufficient NRC attention has been given to coordinating the Federal response affecting licensed facilities.

Resolution: Short and long term  
Lead (FRPPNE): SP  
Support: IE  
Lead (IRAP): IE  
Support: NRR/NMSS/SP

Prior to TMI, the resources assigned to the task of integrating the NRC into a national emergency preparedness program were limited, and low in agency priority. That allocation of low agency priority (which is not unique to NRC)

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is reflected in the fact that the entire program has remained voluntary, and, after years of planning, the FRPPNE is jocularly referred to as a "plan to plan."

E-2 - Licensing and inspection resources need expansion to better implement their emergency planning efforts.

Resolution: Short and long term  
Lead: NRR/NMSS/IE  
Support: N/A

Inspection and licensing efforts related to emergency planning are not in all cases closely integrated. The necessary improvements in implementation will require increased resources.

E-3 - The majority of operating facilities have not been evaluated against the staff's current criteria for emergency planning.

Resolution: Short and long term  
Lead: NRR/NMSS  
Support: IE/SP

Sufficient resources are not available to review emergency plans of existing reactor licensees to bring them into conformance with present emergency planning criteria.

E-4 - The incident response criteria for timely notification of the NRC need to be tightened.

Resolution: Short term  
Lead: IE/SD  
Support: NRR/NMSS/SP

Some basic development of methods for triggering licensee notification procedures and of ensuring NRC recognition of the significance of information passed is required. Setting of criteria for notification and predetermined action is a delicate process of balancing the expense of notification/shutdown/response to some nonemergency against the need to ensure early detection of developing emergencies.

E-5 - An organized "facility class oriented" NRC response capability has not been fully established.

Resolution: Short term  
Lead: IE  
Support: NRR/NMSS/EDO

Based on the NRC role defined by the resolution of problem topic A-5, an efficient and timely response capability must then be instituted in order to cope with the evolution of any future emergency situation. Response should

orient on types, or classes, of facilities so that expertise can be brought to bear quickly and effectively. Such support will be needed both in the field and at NRC headquarters. Therefore, the variables that constitute this capability must be defined, including the data base and communications to make the rapid assessment and response required.

E-6 - There is a need during an actual emergency for near-to-the-site facility to house the multi-agency coordination and response support activity.

Resolution: Short term  
Lead: IE  
Support: NRR/NMSS/SP  
Resolution: Long term  
Lead: EDO  
Support: NMSS/NRR/IE/SP

For sustained operations of a remote NRC response team, efficiency of the participants, including the licensee, will be hampered unduly unless provisions are made to obtain, on a timely basis, offsite but nearby work space for NRC personnel and others. This includes both coordination and support activities. Floor space and support equipment need to be defined and arrangements made, including communications terminals and storage for data brought with the team or accumulated during the emergency.

E-7 - Need exists for expanded NRC monitoring capability.

Resolution: Short and long term  
Lead: NRR/NMSS/IE  
Support: SP

Although the level of monitoring capability necessary to ensure adequate performance of an NRC response team is not currently defined, the analysis of TMI experience, coupled with a better definition of NRC's role, should provide a sufficient base for estimating technical requirements.

E-8 - Procedures for dissemination of public information are not adequate.

Resolution: Short term  
Lead: EDO  
Support: IE

An adequate emergency response plan must include an effective system for informing the public, for updating the information as new developments occur,



and for retracting information when it is found to be in error. Mistaken or false opinions that emanate from an emergency control center can cause damage to the public in excess of the severity of the emergency in progress. For this reason, early identification of information sources, concurrence in factual information released, and frequent updating of public information should be formalized in the planning process.

F - Testing and Verification of Capability

Three problem topics were identified that affect NRC's ability to assess how good the emergency response capabilities are or are likely to be when called on. These cover the range of response capabilities from NRC through the licensee to and including State and local resources.

F-1 - There has never been an NRC-wide audit of the emergency response function. Resolution: Short term  
Lead: EDO  
Support: N/A

Although NRC has an internal audit program, it has not applied a similar mechanism to itself for the emergency planning and response function.

F-2 - Evaluation criteria for drills/exercises are not defined. Resolution: Short and long term  
Lead: NRR/NMSS  
Support: IE/SP/SD

Although a varying degree of evaluation or assessment is associated with the licensing process, NRC does not systematically evaluate the ongoing capability for emergency response, particularly for offsite non-licensure resources. Evaluation criteria for this purpose exist only for the RAC's, although IE does annually verify that arrangements are still in place at power reactors and some other facilities. This does not, however, ensure their adequacy in terms of likely performance but is limited to confidence that they will respond.

F-3 - There is no effective NRC mechanism for continued evaluation of the training and qualification of key State and local emergency response personnel. Resolution: Short and long term  
Lead: SP  
Support: IE

Even if the needed evaluation criteria (F-2) were developed, NRC would still require a program of continuing evaluation to ensure the response agencies continued to be qualified and capable of performing their assigned mission. During 1975-1979, four independent reviews of NRC's emergency response program each stressed the need for utilities and State and local emergency planning officials to realize the importance of trained radiological specialists being involved in the plans and their operations. In each of these critical discussions the moral responsibility of the NRC to assure this provision was stressed. Any mechanism developed by NRC to address this problem topic should clearly give priority to the training, continuing evaluation of capability, and necessary retraining of this requisite cadre of radiological specialists.

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Enclosure 3

NRC ACTION PLAN FOR EMERGENCY PREPAREDNESS

The NRC Action Plan for Emergency Preparedness comprises six individual plans that were coordinated by means of the Task Force. One plan, prepared by RES, and designated "ORG," considers overall (agency-wide) problems and addresses the attributes of a coordinated NRC-wide emergency preparedness organization. The other five plans address problems specific to individual program offices and were prepared by those offices. The six plans were each prepared to correspond to the following format:

- I. Introduction
- II. Summary and Conclusions
- III. Responsibilities Relative to Emergency Preparedness
- IV. Current Program and Capabilities
- V. Requirements and Needs
- VI. Action Plan for Named Office

The plans are presented below under the following tabs: ORG, NRR, NMSS, IE, SP, and SD.

A summary of proposed actions follows.

Summary of Proposed Actions in Chronological Sequence

<u>Completion Date</u>	<u>Office</u>	<u>Prob. No.</u>	<u>Specific Task</u>
August 1979	(IE)	B-2	Upgrade NRC Operations Center communications facilities.
August 1979	(IE)	B-2	Improve heating, ventilating, and air conditioning for NRC Operations Center.
August 1979	(IE)	A-2 & E-1	Meet with Forest Service concerning support to IRAP.
September 1979	(IE)	A-2 & E-1	Meet with IRAP signatory agencies to identify problems regarding TMI-2.
October 1979	(IE)	B-2	Revise NRC Manual Chapter 0502 (without explicit definition of NRC role in emergency response).
October 1979	(IE)	E-7	Define environmental radiation monitoring capability.
October 1979	(IE)	E-2	Identify categories of material licensees for which emergency response plans should be required.
October 1979	(ORG)	Rule	Publish for comment proposed rule for which "early notice" was published on July 17, 1979.
December 1979	(IE)	B-2	Upgrade furniture and audiovisual support equipment in NRC Operations Center.
December 1979	(IE)	B-2	Upgrade NRC Operations Center support staff.
December 1979	(NMSS)	B-3	Prepare criteria for determination of need for and scope of fuel-cycle and byproduct material licensee emergency plans.
January 1980	(NRR)	B-3	Complete the design review and prepare revised procedures for post-accident sampling.
January 1980	(NRR)	B-3	Require improved in-plant iodine instrumentation.
January 1980	(IE)	E-7	Order radiation monitoring equipment to establish an NRC environmental monitoring capability.
January 1980	(ORG)	Rule	Publish final rule for which "early notice" was published on July 17, 1979.
January 1980	(IE)	E-7	Place TLDs' around operating power reactors.
January 1980	(SP)	A-2 & E-1	Stake out prominent role for NRC in development of the National Contingency Plan.
March 1980	(SP)	A-2 & E-1	Complete NRC agency plan for responding to nuclear accidents.
March 1980	(SP)	A-2 & E-1	Include appropriate language in NRC regulations related to State and local radiological emergency response plans on coordination among the various levels of government both in the planning and response periods.

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<u>Completion Date</u>	<u>Office</u>	<u>Prob. No.</u>	<u>Specific Task</u>
March 1980	(SP)	B-4	Complete NRC agency response plan for peacetime nuclear emergencies taking into account responsibilities outlined in FRPPNE.
March 1980	(NMSS)	E-2	Establish Environmental Radiation and Emergency Support Section, and coordinate its activity with IE and SP activities.
March 1980	(NMSS)		Prepare value-impact analysis for extending emergency planning requirements to additional fuel-cycle and byproduct material licensees.
April 1980	(IE)	E-7	Make initial collection of NRC's TLD's.
April 1980	(IE)	E-7	Develop supplemental budget for environmental monitoring equipment not already on order.
April 1980	(IE)	E-7	Procure equipment/data links for NRC monitoring of operational parameters at nuclear plants.
April 1980	(SP) & E-1	A-2	Work with FEMA to seek a consensus among States concerning the proper roles for State and local governments in radiological emergency response.
April 1980	(SP) & B-4	A-T	Work with FEMA in the development of the President's "National Contingency Plan."
April 1980	(IE)	E-2	Revise IE Manual Procedures.
June 1980	(IE)	A-5	Define NRC's role in emergency response.
June 1980	(SP)	C-1	Carry over into regulations the acceptance criteria concept for State and local government plans.
June 1980	(SP)	C-1	Work with FEMA to develop improved handbook of guidance for Federal agency assistance activities with the States
June 1980	(SP)	C-1	Work with FEMA to prepare an improved emergency planning guidance document for the States and local governments.
June 1980	(SP)	D-2	Push for concurrences in plans in States that have operating nuclear power plants using existing guidance and procedures.
June 1980	(SP)	D-2	Begin codifying existing guidance to State and local agencies into regulations.
June 1980	(SP)	D-3	Work with FEMA to establish some Federal mechanism to certify emergency planning and response personnel of State and local agencies.

<u>Completion Date</u>	<u>Office</u>	<u>Prob. No.</u>	<u>Specific Task</u>
June 1980	(SP)	B-6	Have FEMA re-establish the Regional Advisory Committees on a formal basis for all-hazards emergency planning, with NRC to be a member Federal Agency.
July 1980	(NRR)	E-6	Designate location and alternate location for Emergency Operations Center for use of Federal, State, and local officials; provide communications between Emergency Operations Center and plant.
July 1980	(NRR)	E-7	Improve off-site monitoring capability.
July 1980	(SP)		Assure adequacy of State/local plans against current criteria.
July 1980	(NRR)	D-1	Conduct test exercise of power reactor licensee emergency plans.
July 1980	(SP)		Conduct test exercise of State emergency plans.
July 1980	(IE)	E-2	Procure equipment/data links for plant discharge monitors.
July 1980	(IE)	E-2	Develop procedures for inspecting byproduct material licensee emergency plans.
July 1980	(NMSS)	E-3	Draft Reg Guide, Acceptance Criteria, and Standard Format and Content documents for fuel-cycle and by-product material licensee emergency plans.
July 1980	(NRR)	C-1 & E-2	Upgrade emergency plans for power reactors to meet Reg Guide 1.101 with special attention to action level criteria based on plant parameters.
September 1980	(SD)	D-4	Resolve Critical Mass Petition for Rulemaking.
September 1980	(SD)	D-4	Revise Reg Guides 1.101, 3.42, and 2.6.
September 1980	(SP)	B-5	Prepare research study proposals based on analysis of studies now being done.
September 1980	(SP)	F-3	Work with FEMA to establish retraining programs for State and local agency personnel.
October 1980	(IE)	E-2	Commence inspection of byproduct material licensee emergency plans.
December 1980	(NMSS)	C-1	Pursue rulemaking proceedings to require emergency plans for fuel-cycle and byproduct material licensees not now required to have these plans.
December 1980	(SP)	A-3	With FEMA, develop proposed rulemaking or legislation to resolve the problem of funding for State and local agencies to support radiological emergency response planning and preparedness.

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<u>Completion Date</u>	<u>Office</u>	<u>Prob. No.</u>	<u>Specific Task</u>
December 1980	(SP)	F-3	Work with FEMA and other Federal agencies to establish additional required training programs for State and local agency personnel.
January 1981	(SP)		Assure adequacy of State/local plans against upgraded criteria.
January 1981	(NRR/SP)		Conduct joint test exercise of Federal/State/local and power reactor licensee emergency plans for new OL's.
January 1981	(NRR)	E-7 & B-3	Require high-range radioactivity monitors at nuclear power plants.
January 1981	(NRR)	B-2	Upgrade Emergency Operations Center in conjunction with in-plant technical support center.
July 1981	(NMSS)	C-1	Update or supplement Reg Guide 3.42, Rev. 1, to cover Part 30 and Part 40 licensees.
July 1981	(NMSS)	E-3	Issue final (effective) Reg Guides, Acceptance Criteria and Standard Format and Content documents for fuel-cycle and byproduct material licensee emergency plans.
September 1981	(SD)	D-4	Develop emergency planning regulations for research reactors.
December 1981	(NMSS)	C-1	Establish criteria for review and inspection of by-product and source material licensee's emergency plans.
September 1984	(NRR/SP)	F-2	Conduct joint test exercise of Federal/State/local and power reactor licensee emergency plans for all operating plants.