

IE EMERGENCY PLANNING ACTION PLAN

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by

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1071-357

8/3/79

IE ACTION PLAN FOR EMERGENCY PREPAREDNESS

I. INTRODUCTION

POOR ORIGINAL

Purpose

This plan was developed to provide IE coordination with other NRC office activities identified as "problem topics" by the NRC Task Force on Emergency Planning.

Need

Because of the fragmentation within NRC of various emergency planning activities, such a plan is necessary to identify clearly areas of Office responsibility, and more appropriately, assure that no aspect of the "problem topics" is excluded.

Scope

This Action Plan addresses only those "problem topics" identified originally by the Working Group and later modified by the Task Force, for which IE is the lead office.

II. SUMMARY AND CONCLUSIONS

The Action Plan basically calls for revisions and additions to existing IE programs, such as emergency planning inspection activities, the NRC Incident Response Program, the NRC Operations Center, and coordination with other Federal agencies.

Long term success of the plan hinges on the explicit definition of NRC's role in responding to an incident. Issues such as defining the timeliness of our response may require major addition of resources and a revision to the basic way in which we do business in order to meet more stringent requirements.

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Most activities outlined in the plan can proceed to a point without such definition. Such planning will have to be "open-ended", however, in order to handle unexpected or unforeseen roles which the Commission or the Congress may deem necessary as part of NRC's role.

III. IE RESPONSIBILITIES RELATIVE TO EMERGENCY PREPAREDNESS

- Inspect licensees to verify adequacy of emergency plan and procedures.
- "Lead Office" responsibility for NRC Incident Response Program.
- Provide initial response to incidents through Regional Offices.
- Operate NRC Operations Center.
- Coordinate with other Federal agencies in support of NRC emergency planning activities.

IV. CURRENT IE PROGRAM AND CAPABILITIES

IE emergency planning activities are of two kinds: programmatic and reactive. Programmatic activities include:

- inspections related to licensee emergency planning
- coordination of NRC planning activities for NRC Incident Response Program
- Liaison with other Federal agencies, particularly through IRAP.
- DOE Aerial Measurements Program.

Reactive activities include:

- Regional Office Incident Response teams/centers
- Activation of NRC Operations Center
- Implementation of NRC Incident Response Program
- Drawing upon Federal support through IRAP and MOU's

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Current capabilities include the rapid dispatch of IE personnel to an incident site, dedicated communications with licensed facilities and a 24 hour Operations Center containing information and operational resources to activate and orchestrate an NRC response in the event of an incident.

V. OFFICE REQUIREMENTS AND NEEDS

IE manpower and technical equipment funding will be a limiting factor as to how well the plan is implemented since all IE resources were dedicated prior to TMI and the enclosed plan requires additional resource commitment. Depending on the resolution of key issues, such as determination of NRC role, a substantial manpower increase may be required that cannot be absorbed by present staff through reassignment of priorities and still maintain the mainstream of IE activities.

VI. IE ACTION PLAN

Outline

Problem Topic

- Statement of "Problem Topic" from Task Force report

Details of Problem

- A statement or statements of specific problems that are contained in the problem topic

Planning Base for Correcting Problem

- A corresponding statement outlining the philosophy that is believed will lead to an adequate solution of the problem and thus forms the basis for taking the corrective action listed below.

Action Plan

1. Short Range Action - description

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- a. Discussion
 - b. Schedule
 - c. Budget/resource impact
2. Long Range Action - description
- a. Discussion
 - b. Schedule
 - c. Budget/resource impact

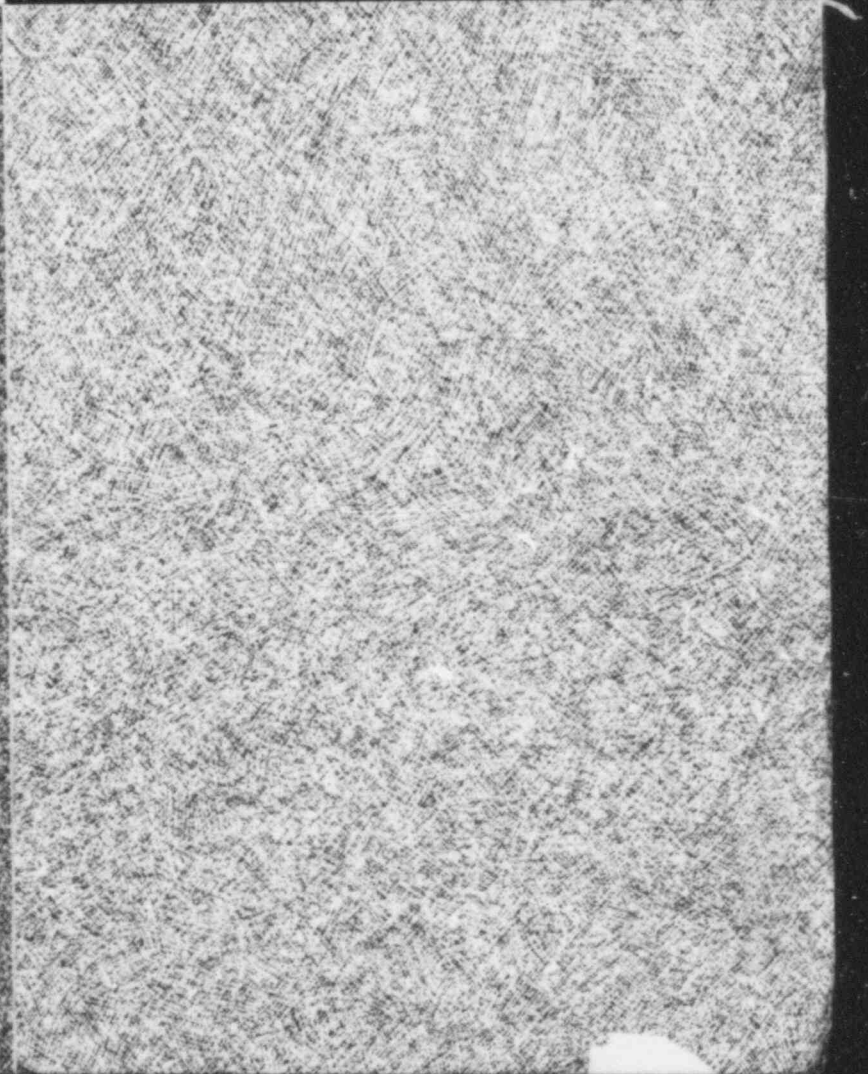
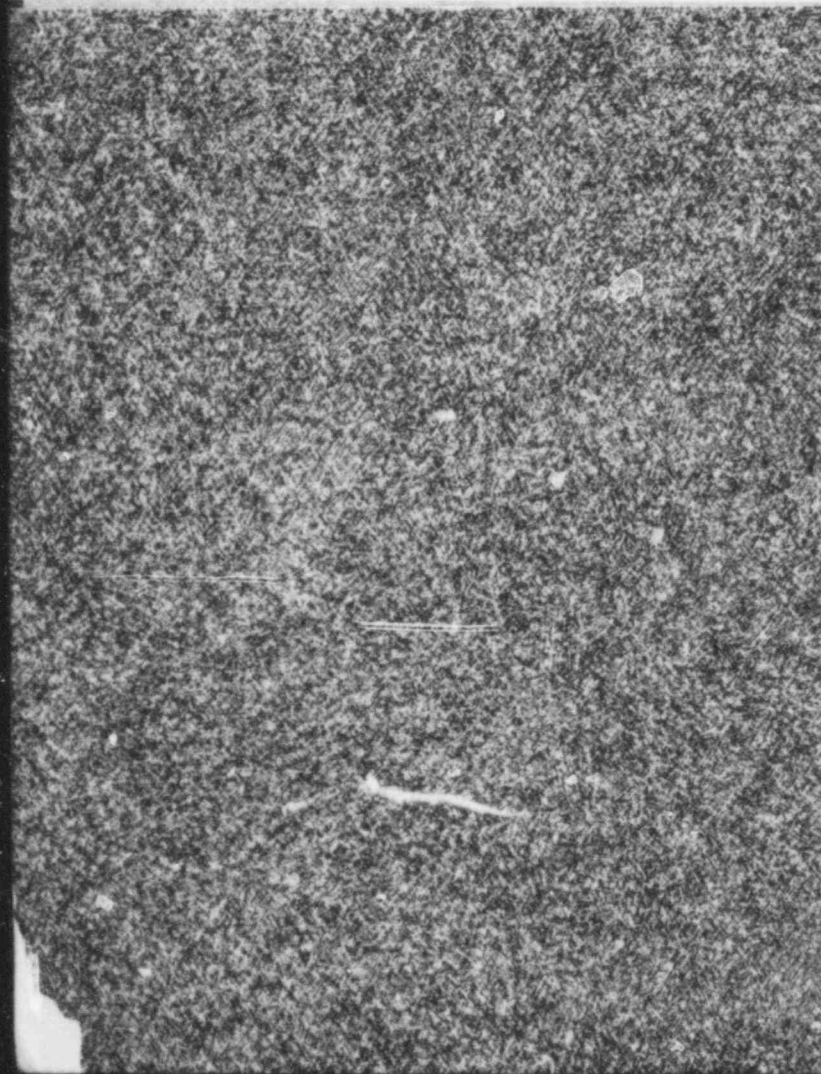
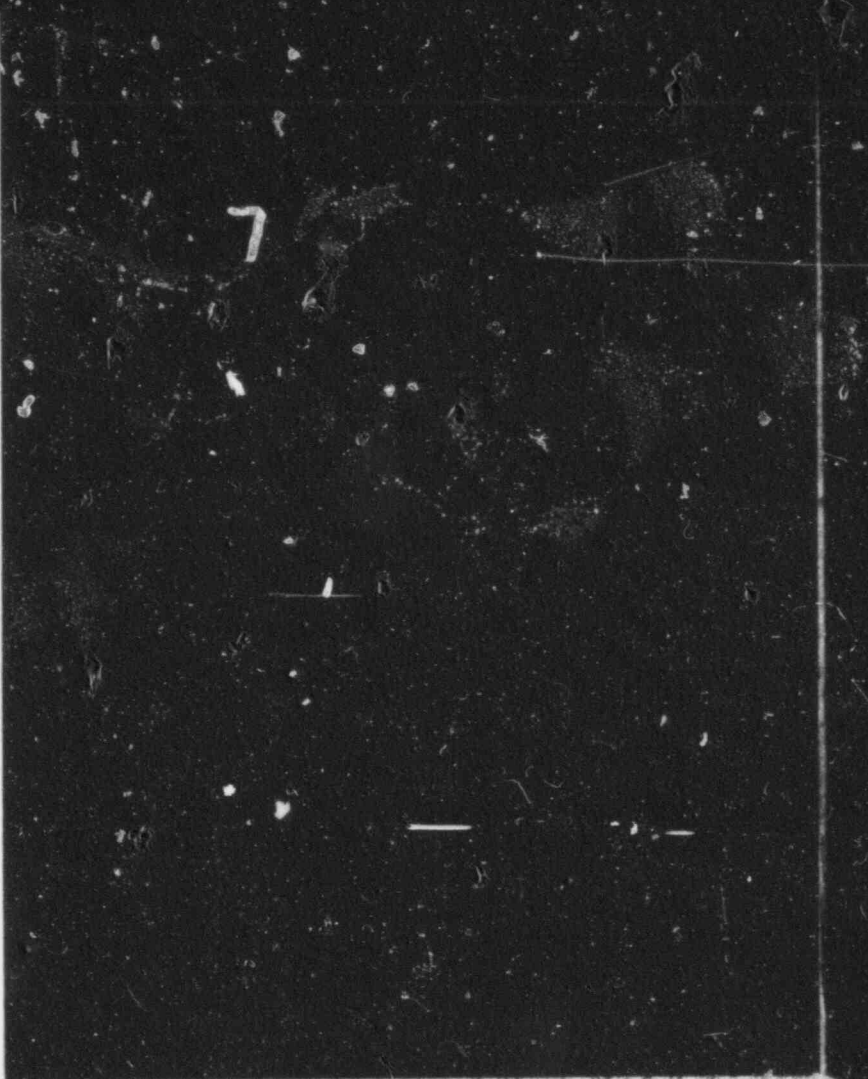
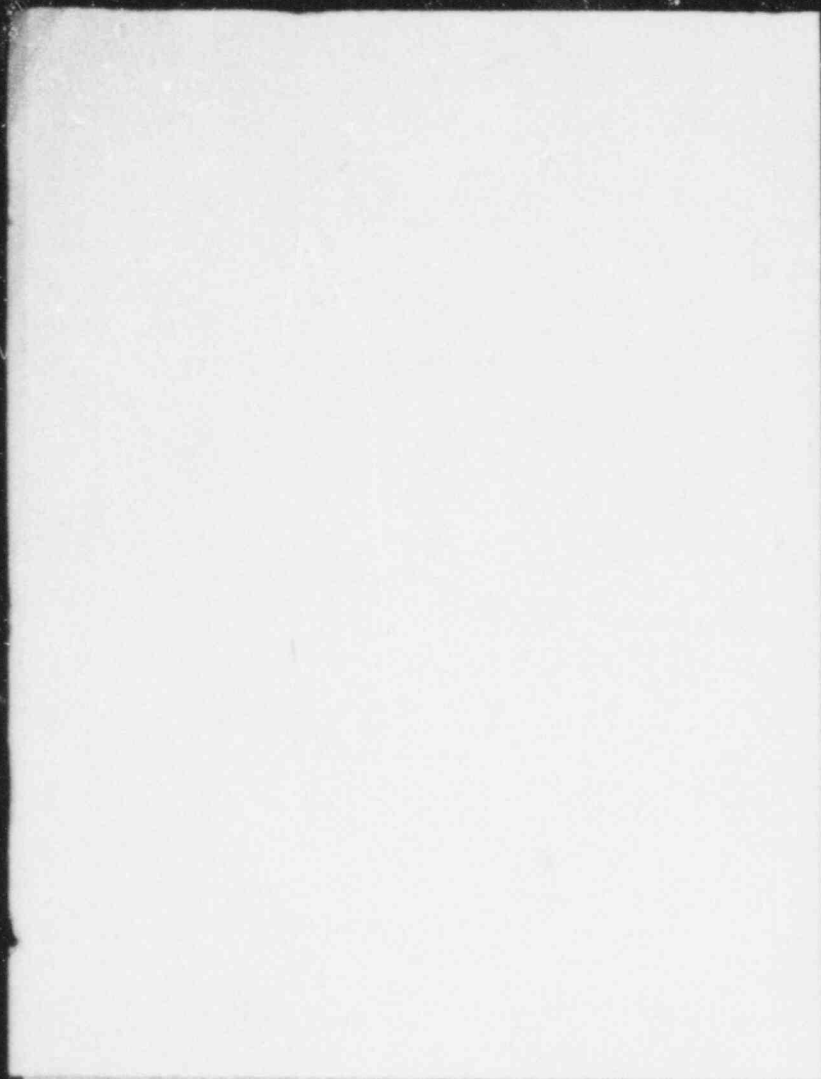
PROBLEM

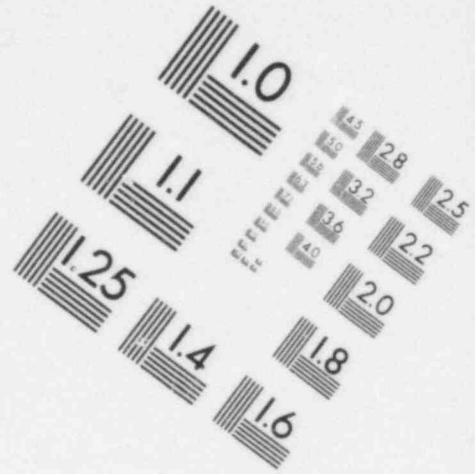
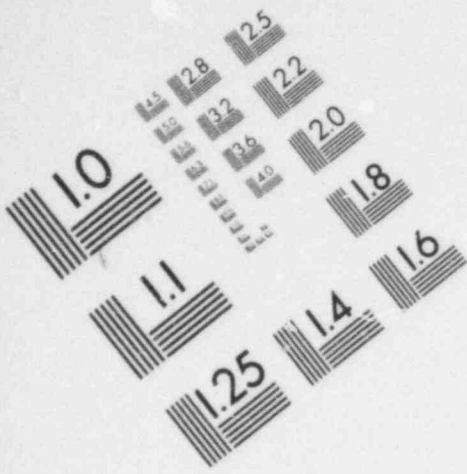
A-2 Formal Arrangements are ill-defined for interagency coordination, including federal, state & local. The process is on a voluntary basis.

A. Details of Problems.

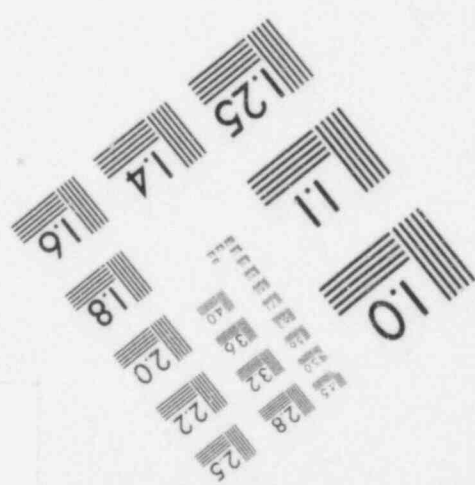
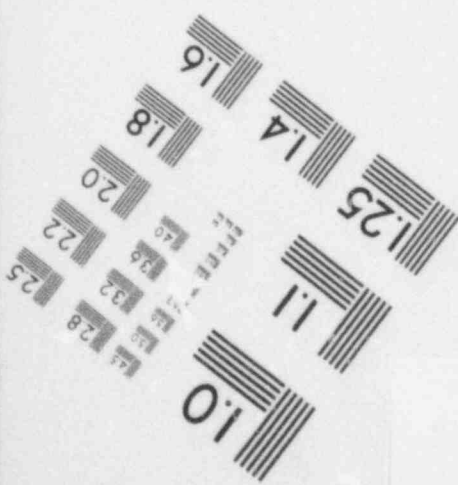
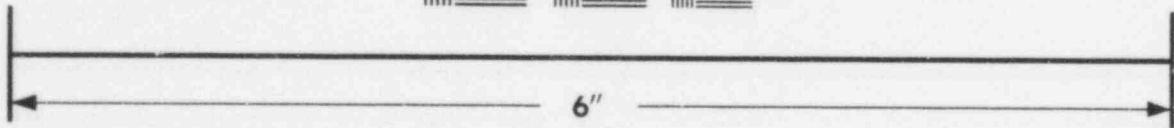
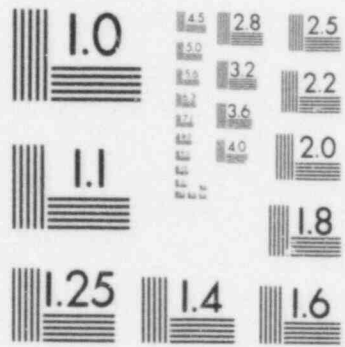
1. IRAP is infrequently implemented. Responsibilities of signatory agencies blur as plan sits on the shelf.
2. Only a few signatory agencies have routine interaction with NRC concerning radiological matters.
3. DOE "lead agency" efforts have not been strong enough to keep all signatory agencies involved.
In turn, some signatory agencies have been apathetic.
4. Present IRAP doesn't clearly delineate operational responsibilities; i.e. field coordination leader.
5. Federal resources were made available that were not part of IRAP.
6. Can IRAP in its present form serve the purpose of federal agency radiological resource coordination.
7. IRAP is voluntary.

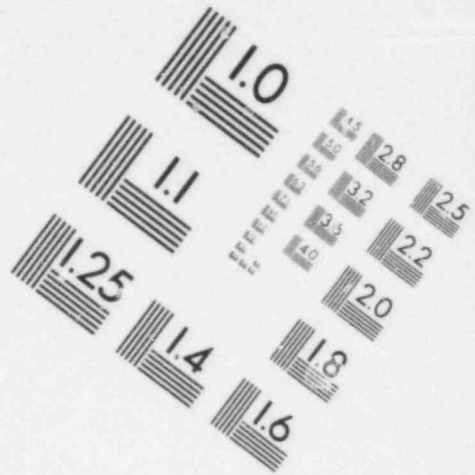
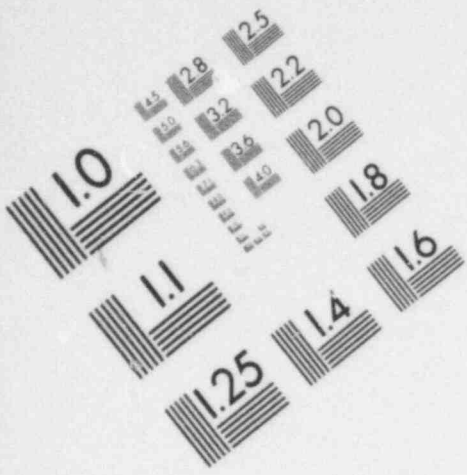
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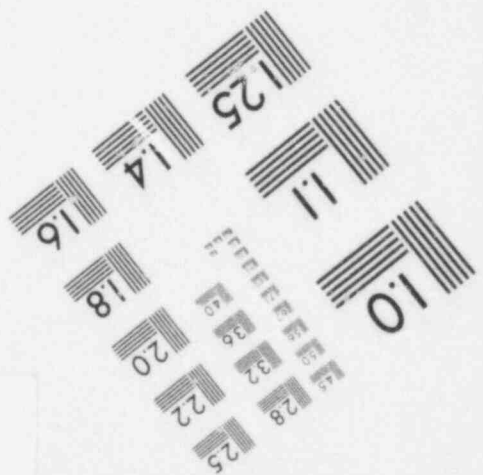
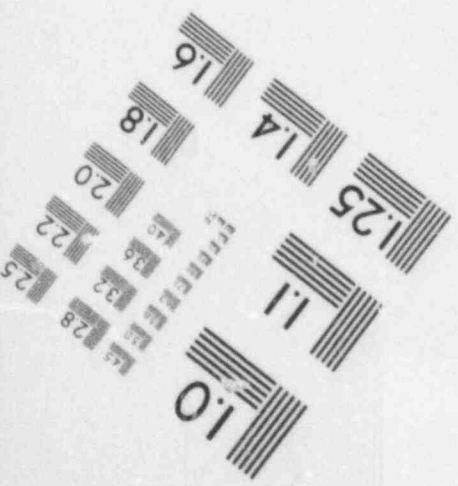
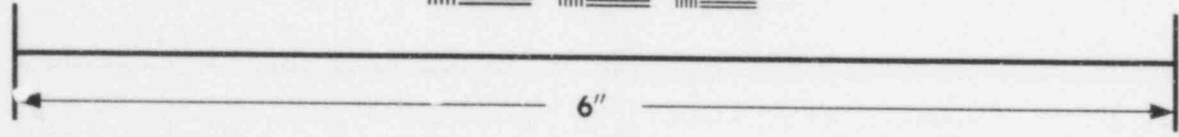


**IMAGE EVALUATION
TEST TARGET (MT-3)**





**IMAGE EVALUATION
TEST TARGET (MT-3)**



POOR ORIGINAL

B. Planning Base for Correcting Problems

1. Renew interest in IRAP by NRC taking "forceful" support role in review of current plan.
 2. Establish and maintain liaison with other signatory agencies.
 3. See 1
 4. Rewrite IRAP to spell out clear definition of responsibilities.
 5. Review TMI experience and survey federal resources to assure that all possible federal radiological assets are collected in IRAP.
- 6&7. Basic question, based on success in making changes to IRAP in 1-5 above, make a determination whether the revised IRAP will meet future NRC needs.

C. Draft Action Plan

1. Short term: signatory agencies and others will meet in September 1979. NRC (IE) will identify problems re TMI.
2. Short term: IE meet with Forest Service in August 1979 concerning support.
3. Long term: revise and rewrite IRAP, schedule based on outcome of meeting in 1. above.
4. Additional resources required: to maintain liaison/coordination with other signatory agencies on a level similar to that currently maintained with DOE will require approximately 4 man-months/year.

1072.001

POOR ORIGINAL

PROBLEM

A-5 NRC has not adequately defined its role in emergency response

A. Details of Problem

1. Explicit definition of NRC role is crucial to determination of agency's responsibilities, functions, and requirements.
2. NRC's TMI role may not necessarily be the appropriate one for a regulatory agency.
3. Lack of clear role definition resulted in confusion during response to incident and hampers planning process.

B. Planning Base for Correcting Problem

1. Staff must develop various alternatives; contractor support necessary.
2. Early Commission approval necessary
3. See 1 & 2

C. Draft Action Plan

1. Short term: coordinate with NRR, NMSS, and SP on development of work statement to define spectrum of potential NRC roles. Each role would define authorities, responsibilities, functions, relationships with other emergency planning efforts and identify resources necessary especially if role requires NRC involvement in areas not currently considered NRC responsibility.
2. Long term: assume 1 month for work statement development, 3 month procurement effort, 9 month contract. Report due June 1980. Commission Discussion Paper then prepared.
3. Additional Resources required: based on Commission decision of NRC role impact on resource varies. Estimate 2 additional man-years/year to implement chosen role; 3 man-month effort by IE to coordinate contractor effort.

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PROBLEM

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

A. Details of Problem

1. There are delinquent sections required by the existing MC
2. The MC will have to be revised based on the determination of NRC role.
3. Appropriate aspects of national level emergency planning need to be incorporated in MC. —
4. Physical facilities inadequate.

B. Planning Base for Correcting Problem

1. IE will identify missing sections at MC and coordinate with identified offices to obtain specified information.
2. A group consisting of IE, NRR, NMSS, and SP representatives will be formed to rewrite the MC once a determination of NRC role is made.
3. The group specified in B2 above will determine what aspect of national level emergency planning should be incorporated in the revised MC.
4. Upgrade Operations Center major deficiencies.

C. Draft Action Plan

1. Short term: manual chapter revision will be accomplished by October 1979 insofar as possible without explicit definition of NRC role. Delinquent sections will be evaluated to determine whether implementation still worthwhile.
2. Short term: appropriate national level planning will be incorporated in guidance dependent on congressional activities.
3. Short term: upgrade Operations Center communications with facilities by August, 1979.

1072 003

4. Short term: Upgrade Operations Center support staff by December 1979.
 - 5 man/year increase
5. Short term: Upgrade Operations Center facilities
 - Improve HVAC August 1979
 - Upgrade furniture December 1979
 - Upgrade A/V support December 1979
6. Long term:
 - Upgrade field communications
 - Increase incident response program manpower
 - 2 additional planning staff
 - 2 additional operations staff
 - Upgrade Operations Center to handle data input (per Sandia study)
 - Upgrade recording capabilities, revise phone system
7. Long term: expand Operations Center to adequately support incident response activities on extended basis.
8. Long term: rulemaking to determine who pays for communications at licensee's expense.
9. Additional Resources required:
 - Communications: Initial upgrade cost \$1.2 M/year if NRC foots bill for phone system.
 - Additional cost \approx \$200K for upgrading field communications.
 - Upgrade data transmission/display cost unknown.

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Physical Facility: Expand Operations Center: \$100K (based on similar cost to build current Center) including cost to hire personnel.

Manpower: Short term: +5 staff ~ GS-9

Long term: +4 staff ~ GS-13

Exercise Program: \$100K/year contractor support may substitute some additional manpower requirement.

PROBLEM

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

A. Details of Problems

1. IRAP is infrequently implemented. Responsibilities of signatory agencies blur as plan sits on the shelf.
2. Only a few signatory agencies have routine interaction with NRC concerning radiological matters.
3. DOE "lead agency" efforts have not been strong enough to keep all signatory agencies involved.
In turn, some signatory agencies have been apathetic.
4. Present IRAP doesn't clearly delineate operational responsibilities; i.e. field coordination leader.
5. Federal resources were made available that were not part of IRAP.
6. Can IRAP in its present form serve the purpose of federal agency radiological resource coordination.
7. IRAP is voluntary.

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B. Planning for Correcting Problems

1. Renew interest in IRAP by NRC taking "forceful" support role in review of current plan.
 2. Establish and maintain liaison with other signatory agencies.
 3. See 1
 4. Rewrite IRAP to spell out clear definition of responsibilities.
 5. Review TMI experience and survey federal resources to assure that all possible federal radiological assets are collected in IRAP.
- 6&7. Basic question, based on success in making changes to IRAP in 1-5 above, make a determination whether the revised IRAP will meet future NRC needs.

C. Draft Action Plan

1. Short term: signatory agencies and others will meet in September 1979. NRC (IE) will identify problems re TMI.
2. Short term: IE meet with Forest Service in August 1979 concerning support.
3. Long term: revise and rewrite IRAP, schedule based on outcome of meeting in 1. above.
4. Additional resources required: to maintain liaison/coordination with other signatory agencies on a level similar to that currently maintained with DOE will require approximately 4 man-months/year.

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PROBLEM

E-2 Licensing and Inspection Resources need Expansion to Better Implement the Emergency Preparedness Efforts

A. Details of Problem

1. At the present time only one licensee (power reactors and fuel facilities) drill every two years is observed by NRC inspectors. The number of inspectors observing is not sufficient to evaluate the performance of all participating organizations. Offsite agency preparedness is not rigorously evaluated. Improvement in licensee readiness evaluation is needed.
2. NRC inspection of emergency preparedness at material licensee facilities is essentially non-existent.
3. Coordination of NRC Inspection/Licensing effort associated with NRC licensed facilities needs improvement.

B. Planning Base for Correcting Problem

1. a. Power reactor and fuel facility drills are to be observed and evaluated by a multi-disciplined NRC evaluation team on an annual basis.
b. Offsite agency preparedness and capabilities will be evaluated rigorously - Licensing office/SP coordination/participation.
c. Licensee preparedness will be evaluated more comprehensively (Preoperational and every 2 years thereafter).
2. NRC Inspections of emergency preparedness activities at appropriate material licensees will be conducted. Licensees requiring emergency preparedness inspections will be identified by a joint IE/NMSS effort.
3. a. IE will participate with NRR and NMSS in upgrade effort pertaining to evaluation of existing emergency plans.
b. IE will participate with SP in the evaluation of State/Local agency

C. Draft Action Plan

1. Licensee emergency plan drills (power reactors) will be observed by a team of ~~IE inspectors~~ on an annual basis.
a. Initial inspections at power reactors in consonance with the joint NRC action (NRR/SP/IE) for promptly upgrading emergency preparedness activities - schedule of inspections will be consistent with drills identified in NRR Action Plan.
b. IE Manual Procedures revised - April 1, 1980. (Based on input of results from criteria developed during a. above).
2. Acceptance criteria for evaluating State agency performance will be defined by SP.

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- 3. As part of its inspection program, -IE- (in conjunction with SP) will evaluate State agency readiness.
 - a. Procedures developed - (date - 2 mos. after date in C.Z.)
 - b. Conduct evaluations - as part of routine inspection effort - on an annual basis.
- 4. Emergency preparedness activity requirements for material licensees ~~will~~ be developed.
 - a. IE identifies categories of licensees which should be included - October 1, 1979.
 - b. NMSS, in conjunction with IE, develops and improves requirements - January 1, 1980.
 - c. IE conducts emergency preparedness inspections.
 - (1) Procedures developed - July 1, 1980
 - (2) Commence conduct of Inspections - October 1, 1980 (allows time for licensee to take necessary actions)

Resource Requirements

Items 1-3 above were addressed in FY'80 supplement. Resources necessary for implementation of 4.c. above will be defined upon conclusion of items 4.a and b. and will be included in FY'81 budget supplement, if necessary.

PROBLEM

The Incident Response Criteria for Timely Notification of the NRC need to be tightened

A. Details of Problem

- 1. Current licensee requirements for notification do not require notification as quickly or as explicitly as desired.
- 2. Licensee reluctant to notify NRC because of uncertainty of NRC response

B. Planning Base for Correcting Problem

- 1.a. Provide more explicit criteria to licensees as to when to notify NRC. Assure that the criteria are implemented and understood.
- b. Simultaneously develop acceptance criteria for notifications to trigger an emergency response from NRC.
- 2. A better organized method of receiving and disseminating such notifications within the NRC will be developed and licensees will be informed as to what happens to the information once it is received at

NRC.

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C. Draft Action Plan

1. Short term: criteria for notification to NRC ~~have been disseminated~~ to licensees. Criteria will be adjusted based on initial response by licensees until appropriate type and degree of information is obtained.
2. Short term: procedures for handling information within NRC ~~will be~~ revised to assure timely dissemination.
3. Long term: OSD needs to develop standardized criteria based on NRR/NMSS input for licensee notifications.
4. Long term: ~~it~~ will verify criteria implementation through inspection process.
5. Long term: HQ Incident Response Plan revised based on ~~the~~ criteria. Licensees informed of revisions. Inspection process continues.
6. Additional Resources required: no major impact on budget nor manpower expected.

PROBLEM

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

A. Details of Problem

1. Role must first be defined.

B. Planning Basis

1. Changes that can be implemented without definition of role will be undertaken.

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C. Draft Action Plan

1. Short term: ~~NRR/NMSS/SP~~ must identify incident response organization both at HQ and site; requirements will be integrated with IE response to form NRC incident response organization requirements, e.g., manpower, information, logistical support.
2. Long term: proficiency gained during TMI experience will fade. Exercise program must be reinstated before this occurs. Exercises begin NLT March 1, 1980.
3. Additional Resources required:
 - a. To adequately maintain interoffice liaison, awareness of roles/responsibilities, and resources available - 0.5 man-years/year per office.
 - b. Exercise planning will require at least 1 man-year/year. Exercises will also serve to acquaint personnel with changes in resources.
4. Long term: revise, based on definition of role, IE MC 1300.

PROBLEM

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.

A. Details of Problem

1. An NRC response in the future will most likely send a large contingent to the site of an incident. This requires pre-planned communications, logistical, and administrative support.

B. Planning Base for Correcting Problem

1. Determine requirements from offices as to expected support to be sent to site.
2. Coordinate with ADM in HQ and Regional Office AO to arrange for necessary support equipment agreements and procedures.

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C. Draft Action Plan.

1. Short term: ~~RRP/NMSS~~ identify anticipated site support and functions based on current expectations; IE integrate with Regional Office response.
2. Short term: Identify operational and support requirements based on Office input above; contact ADM and Regional Office Administrative Officers and have them make prearrangements to obtain support in event of incidents; incorporate in Incident Response Plans.
3. Long term: based on definition of role, revise existing support capabilities.

PROBLEM

E-7 A need exists for Expanded NRC Monitoring Capability

A. Details of Problem

1. NRC Independent Monitoring Capability Needs are not fully defined.
 - a. Operational Areas
 - b. Radiological Areas
2. Current Monitoring Equipment for comprehensive prompt radiological evaluation is not sufficient.
3. Current Monitoring Equipment for evaluation of operational status is non-existent.

B. Planning Base for Correcting Problem

1. NRC needs for independent monitoring capability will be assessed. NRC has a need for independent monitoring capability but should not duplicate capabilities which will be promptly supplied by other Federal agencies.
2. NRC monitoring equipment will be upgraded so that a prompt (real time) on-the-spot independent assessment of radiological hazards (both inplant and in the environs) is possible. The monitoring equipment will be able to provide the NRC with a firm basis for independent population dose assessment.
3. Equipment which will provide the NRC with the capability of monitoring "key" plant parameters is necessary and will be obtained.

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C. DRAFT Action Plan

1. NRC offices will identify areas where expanded NRC monitoring capabilities are necessary:
 - a. Operational parameters
 - (1) To be defined by NRR/NMSS and IE prior to January 1, 1980.
 - b. Radiological monitoring
 - (1) Environmental monitoring capability ~~to be defined by IE by~~ October 1, 1979.
 - (2) Plant discharge monitoring needs to be defined by NRR/NMSS by January 1, 1980.
2. IE will procure equipment and develop procedures for utilizing same -
Note: Equipment which is to be promptly supplied by other Federal agencies will not be duplicated.
 - a. TLDs will be placed around operating power reactors by January 1, 1980.
 - b. Initial collection of NRC's TLDs will be made by April 1, 1980.
 - c. Monitoring equipment identified by IE in C.1.b.(1) above will be ordered - January 1, 1980 (consistent with FY '80 budget).
 - d. Budget supplement for equipment not included in C.2.c. will be developed - April 1, 1980.
3. Equipment/Data links will be procured for placement in NRC Incident Response Center
 - a. As defined in C.1.a.(1) - April 1980
 - b. As defined in C.1.b.(2) - July 1980