

FEDERAL EMERGENCY MANAGEMENT AGENCY

Region V
Federal Center
Battle Creek, MI 49016

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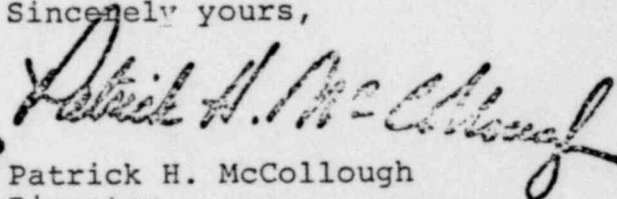
Mr. Robert G. Ryan
Director, Radiological Emergency
Preparedness Division
Federal Emergency Management Agency
1725 I Street, NW
Washington, D. C. 20472

Dear Mr. Ryan:

The Radiological Assistance Committee and the Radiological Emergency Planners met with FEMA Region V State Directors and their representatives in Glen Ellyn, Illinois, February 19-20, 1980. The purpose of the meeting was for the review of the revised criteria contained in NUREG 0654/FEMA REP-1. As a result of that meeting, a compilation of questions and comments were assembled for clarification and response by your office.

Request clarification and guidance be provided to us in a timely fashion.

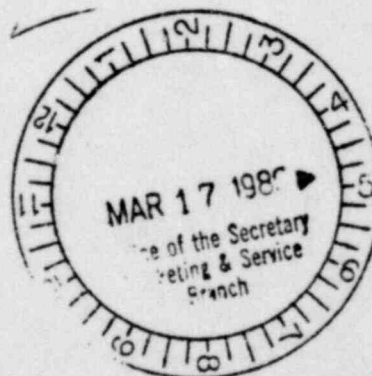
Sincerely yours,



Patrick H. McCollough
Director
Plans and Preparedness Division

Enclosure

cc: Sec. of the Commission, USNRC



Acknowledged by card... dlh.....

L-4-1, Pt. 50

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ITEM	EVALUATION CRITERIA	COMMENT
A.3.	Each plan shall include written agreements referring to appropriate legal instruments such as legislation, among Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information.	Is a written agreement necessary when authority is already published?
C.2.	Each principal organization shall plan to dispatch representatives to the operators near-site Emergency Operations Facility. The operator shall provide for the dispatch of a representative to principal offsite governmental emergency operations centers.	Does this literally mean each principal organization (Operator, State, local) will have designated representatives for assignment to: 1) near-site Emergency Operations Facilities and, 2) to principal off-site Emergency Operations Centers?
F.1. F.1.c.	The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for operators, local and State response organizations. Such system should be selected to be compatible with one another. Each plan shall include: c. provision for communications with Federal emergency response organizations;	With regard to communications links, primary and backup: on the Federal side Region III NRC has only primary communications which is telephone. The same is true for DOE. Neither has radio capability. The problem is with the requirement for back-up communications system. Please clarify.
G.3.b.	Each operator shall provide space for the news media at the nearsite Emergency Operations Facility.	Indications are it is the States' desire to have a uniform release of vital information. Therefore it is the States' plan for the news media to get their releases from one central point; that is the Emergency Operations Center

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G.5.	Each organization shall conduct programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.	used by the governor. Suggest inserting the word "local" between ...acquaint..and..news....
G.6.		Development of G.6. <u>ACCURATE INFORMATION</u>
G.7.		Development of G.7. <u>RUMOR CONTROL CENTER</u>
G.8.		Development of G.8. <u>TECHNICAL INFORMATION</u>
H.10.	Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.	Greater definition is requested. What is meant by "sufficient reserve equipment"? What kind of equipment is implied?
H.12.	Each organization shall establish a central point (preferably associated with the operators near-site Emergency Operations Facility), for the receipt and analysis of all field monitoring data.	Is it necessary for each organization (Operator, State) to establish a central point for receipt and analysis of field samples? To what depth is meant by analysis? The analysis is to be made by the appropriate authority. The equipment is said to be complex and not as mobile as believed delicate. Are mobile labs to be developed for this purpose?
I.		The States in Region V feel strongly they could serve as backup in data collection.

ITEM

EVALUATION CRITERIA

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- I.7. Each organization shall have a capability to detect and measure radioiodine concentrations in air in the vicinity of the site as low as 5×10^{-8} uCi/cc (microcuries per cubic centimeter) under field conditions in any kind of weather. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.
- J.10.h. Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone;
- K.5.a. Each organization shall specify action levels for determining the need for decontamination.
- K.
- If compliance is met there would be an extraordinary amount of equipment necessary for the State to procure. It appears that under this criteria there would be a necessary duplication of effort.
- With regard to smaller facilities (Minn); it is felt the application of this criteria is not realistic. Some nuclear power plants are small wattage, therefore do not possess the same element of risk and in turn the same requirements should not be imposed.
- The local organization does not have the resources for determining the need for decontamination. Generally the State, through the county health department, advises the public using the resources of the State.
- General consensus among RAC members and Planners is, why is this section included. In that we are addressing contamination from a nuclear power plant that has a potential to give off gases that occur from a rupture or leak and not from an explosion. If anything is to be addressed in this light the question is why contamination from a water leak such as into a stream or river or even a large body of water is not addressed as to having monitoring stations down river or on the shore of a body of water.

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L.4.	Each organization shall describe arrangements for transporting victims of radiological accidents to medical support facilities.	It is not clear what is meant by radiological accidents as to its impact on operator, State and local government. Example - if village firemen are called to assist in fire or rescue who has responsibility.
M.3.	Each operator and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.	For clarity it is believed the criteria should be worded as follows in two paragraphs. M.3. The operator and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated.
M.4.	Each plan shall establish a method for periodically estimating total population exposure.	M.4. The operator and State plan shall develop a procedure of notification of any changes in the organizational structure that may occur. It is felt additional guidance in the criteria is necessary for more thorough understanding. Does this apply to the Ingestion Zone? Inhalation Zone? What is meant by periodically? At what frequency? Key sentence is necessary to define "total population exposure".
N.1.b.	An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the annual exercise by Federal and State observers/evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five-year period. Each organization shall make provisions to start an exercise between 6:00 p.m. and midnight, and another	If the organization has not fully developed a particular element of the plan for testing that particular element could be shelved for five years. Question. Why the unusual hours for a test? There is concern that the hours were not reasonable and would certainly aggravate the public. In addition the hours stated would cause complications in that many people would have to be paid overtime.

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between midnight and 6:00 a.m. once every six years.

- P.9. Each operator shall arrange for and conduct independent audits of the emergency preparedness program at least every two years. The audit shall include the emergency plan, its implementing procedures and practices, training, readiness testing, and equipment. Management controls shall be implemented for evaluation and correction of audit findings. The result of the audit shall be documented, reported to appropriate organizational management and retained for a period of five years.

Question. Who audits? Who is to be designated? Is the audit on-site, off-site or both?