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Docket Nos. 50-213, 50-245  
and 50-336

MAY 12 1980

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Mr. W. G. Council, Vice President  
 Nuclear Engineering and Operations  
 Connecticut Yankee Atomic Power Company  
 Post Office Box 270  
 Hartford, Connecticut 06101

Dear Mr. Council:

Our letter of March 10, 1980, sent NUREG-0654 to all power reactor licensees and applicants for a license to operate a nuclear power reactor. As stated in that letter, the document, entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants", will be used to evaluate recently submitted upgraded emergency plans.

The emergency preparedness review team has reviewed the Millstone and Haddam Neck Emergency Plans, Revisions 6 and 7, respectively, against the evaluation criteria of NUREG-0654. The results of the review were presented to your staff in a series of technical meetings held in East Lyme, Connecticut on April 1 through April 3, 1980. Since your upgraded plan was developed prior to the issuance of NUREG-0654, many of the evaluation criteria were not addressed in your plan. Additional information relative to the evaluation criteria is required before the staff emergency preparedness review team can complete its evaluation of your program.

Accordingly, your emergency plan should be reviewed against the evaluation criteria of NUREG-0654 and the enclosed specific comments. You should submit, by June 30, 1980, a detailed course of action and an implementation schedule which allows for the submittal and review, by January 1, 1981, for both sites of an emergency plan which satisfies all provisions of NUREG-0654.

Sincerely,

Original signed by  
 Dennis M. Crutchfield

Dennis M. Crutchfield, Chief  
 Operating Reactors Branch #5  
 Division of Licensing

*RReid*  
 RReid  
 5/12/80

Enclosure:  
 Comments

OFFICE CC:		DL:ORB #5/LA	DL:ORB #5/PM	DL:ORB #5/PM	DL:ORB #5/C	DL:ORB #4/F
SURNAM	See next page	HSmith	RCaruso	JShea	DMCrutchfield	MConner
DATE		1/80	5/9/80	5/11/80	5/11/80	5/12/80

Mr. W. G. Council

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May 12, 1980

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## HADDAM NECK AND MILLSTONE EMERGENCY PLAN REVIEW

### COMMENTS

(April 15, 1980)

NRC and FEMA have published a criteria (NUREG 0654) for use in evaluating emergency plans which incorporates all the previous guidance. The Haddam Neck (HN) and Millstone (MS) Plans Draft, January 1, 1980, were reviewed for compliance using this document. The plans were found in some cases not to contain sufficient detail to allow the staff to determine if the criteria were adequately addressed. Comments on selected criteria and their relationship to the plans are attached along with comments from FEMA and IE Region I. The review team did not attempt to identify and comment on every area not covered in sufficient detail. The plans must be revised to address all the applicable NUREG 0654 criteria and resubmitted by June 1980. The review indicated the following major deficiencies:

1. The specific instruments, readings (EALs), and logic which will initiate an emergency condition were not sufficiently specified in the plans.
2. The plans do not provide for direct notification of officials responsible for offsite protective actions within 15 minutes of detecting a "general" emergency condition. This notification must include the protective actions initially recommended by the site (as specified in Annex V, Section 202-1 of the Connecticut State plan). In addition, the plans do not provide for recommending more detailed protective measures based on actual plant conditions within 30 minutes.

3. A system for providing early warning (15 minute) and clear instructions (radio/TV) to the public within the plume EPZ was not described.
4. A public education program was not described.
5. The plant emergency organization is not adequately described. The total organization to the working level and the relationship between emergency and normal positions are not specified. The role and interface with the corporate offices are not clearly defined.
6. The state and local plans for the jurisdictions with emergency roles for the plume 2 to include New York and ingestion pathway EPZ were not included as part of the emergency plans.
7. The State of Connecticut accident classification system and criteria for implementation of protective actions are not consistent with NUREG 0610. Classification and protective action implementation is tied only to projected doses and does not take plant status into consideration (Section 4.1.2 and Table 4-2). For example, loss of two of three fission product barriers with potential loss of the third (Table 4-1) is classified by the site (and NUREG 0610) as a general emergency which should require immediate protective actions, while under the state system it could be any one of a range of classifications, some requiring no protective action.

## Detailed Comments

### Definitions

1. Provide maps/diagrams showing the plume EPZ, population centers, site EOC, alternate EOC, special populations, state and local EOCs, jurisdictional boundaries (see acceptance Criterion A.1.a comment), and site centers identified in Tables 5-5(MS) and 5-6 (HN). Provide a map showing the ingestion EPZ showing jurisdictional boundaries.
2. Define NUSCO.

NUREG 0654

PLAN(S)

Acceptance Criteria

Comment

A.1.a/d/e

Identify by title the authorities and the title of a 24-hour point of contact who is responsible for implementation of protective actions within the plume EPZ (parks, towns, river, New York - Fishers and Plume Islands (MS), etc). This can be any organization (i.e., State Police) provided they can: (1) activate the alerting system, (2) provide public information messages, (3) initiate followup actions (door-to-door system, etc). The authority of such a second party to implement protective actions for the townships must be documented by plans or letters of agreement. Identify all the state level agencies with emergency roles not just the initial point of state contact to include the agencies (all States) responsible for ingestion pathway protective actions.

A.1.c

Provide figures showing the interfaces with all local officials and state agencies with emergency roles including the officials authorized to implement protective actions. Identify, by title, the primary ongoing interface with offsite agencies (Site Emergency Organization Director?) In addition, for Millstone describe the interaction between both units during an emergency.

A.2.a

Provide a summary showing the relationship of state and local agencies to the functional areas listed in this criteria. The figures prepared in response to criteria A.1.c must show the agencies which perform these functions.

A.3

The legal instruments need not be addressed in the plan. The written agreements with offsite response agencies attached to the plan must be expanded to address the following areas as applicable:

1. implementation criteria,
2. measures to be provided,
3. information exchange,
4. authorities and responsibilities,
5. limits of action,
6. point of contact at site,
7. training and drills.

The state plan(s) can meet this requirement for those agencies addressed (section 5.4.1) provided each agency is a signatory to the plan (they are not at this time) concurring in their roles. The State (Conn and NY) and local plans (within plume EPZ) must be submitted as part of the site emergency plan.

The plans for the states (Connecticut, New York, Rhode Island) within the ingestion EPZ which address ingestion protective actions must also be part of the site emergency plan.

A.4

List the job title(s) of the individual(s) responsible for 24-hour emergency manpower planning (NUSCO Manager of Resources--Section 5.3.5?). List the minimum staff onsite for Millstone (by normal position Title).

B.1

Show the relationships between normal assignments (position titles) and emergency positions for all emergency response personnel (not just managers HN-Table 5-3; MS-Table 5-4). It is acceptable to associate several normal organizations positions to an emergency position to allow flexibility.

Indicate how the various responsibilities for plant emergency response are transferred to newly arrived personnel (e.g., tag board).

B.2

Identify the onsite (all shifts) individual who has the authority and responsibility to immediately and unilaterally notify offsite officials and recommend protective actions. Clearly state that this individual will be onsite 24 hours and will immediately and unilaterally initiate an emergency response



to include offsite notification as specified by the classification system contained in the plans. The implication in the plan that the Duty Officer (who is not always onsite) has this responsibility is unacceptable and must be clarified.

- B.3 Provide the line of succession, for the authority and responsibility for declaring emergencies and offsite notification and specify the criteria for transfer. (Expand discussion page 5-1 and Tables 5-3(MS) and 5-4(HN).)
- B.4 Specify that the individual identified in response to criteria B.2 will not delegate the responsibility for initiation of offsite notification and that he/she will not perform any duty (e.g., direction of fire fighting pg. 5-3?) which could interfere with his/her initial coordination and notification functions during the backshift.
- B.5/8 Indicate which members of the minimum operational crew would be assigned to perform the major functions outlined in NUREG 0654, Table B-1 (e.g., Radiological Monitoring Team(s) or monitor evacuees) and who will perform offsite dose projection calculations or determine the protective actions to be recommended

offsite during the initial phases of an emergency (before the shift staff could be augmented all shifts).

Specify the number of personnel available to perform the functions and tasks discussed above as a function of time (immediately available and as augmented within 60 minutes).

The qualifications of emergency personnel must be described. This can be accomplished by identifying their normal assignments (Criterion B.1) and the emergency tasks (that are not part of their normal assignments) for which they will be trained and qualified (tested) (See Criterion 0.4).

#### B.6

Show the interfaces (Revise or Expand Table 5-2(HN) and 5-1(MS)) for all the emergency functions/tasks identified in Table B-1 and the other functions identified (e.g., dose projection, protective action determination) in the plans. In addition the figures (Tables) should indicate the duty stations of the personnel to include all the centers identified in the plans (media center, recovery center).

Resolve the apparent overlap and conflicts in roles between site and NUSCO emergency organizations. For

example the site and NUSCO managers of External Communication (Section 5.2.1 and 5.3.4) both coordinate and transmit information offsite; a similar problem exist with assessment actions (Section 5.2.1 and 5.3.2). If there is a NUSCO plan it must be submitted.

C.1

Identify who will request RAT assistance, summarize the assistance that is available under the RAP, how the teams report to the site and what is their expected response time.

C.2

Identify the provisions including communication, that have been made at the site EOC to support representation from the offsite agencies, the agencies to be represented and how they will interface with the EOC staff.

State the criterion (consistent with NUREG 0610) for dispatching the NUSCO and site representatives to the state and local EOCs (Section 5.3.1 and 5.3.4) and describe their functions and expected response times.

C.3

Specify the expected response time of the laboratory support discussed in Table 7.2.

D 1/2

Revise the immediate actions to be taken in response to each emergency class as described in Section 4.1 to be consistent with those specified in NUREG 0610 to include:

- a) define "prompt" - to be 15 minutes for notification of offsite officials for Alert, Site and General emergencies and as agreed to by the official to be notified for an Unusual Event.
- b) identify the officials to be notified. (See Criterion 1.A.a)
- c) remove the indication in Section 4.1.1 of the HN plan that no release of radioactive material are expected during an Unusual Event (Note - releases exceeding Tech. Specs. are an Unusual Event NUREG 0610),
- d) specify that plant status updates will be provided to offsite officials every 15 minutes if appropriate,
- e) specify and identify that a "dedicated" individual (External Communication Manager, pg. 5-1?) will provide information to offsite officials during alerts, site and general emergencies,

- f. specify that a written summary will be provided to offsite authorities within 8 hours of the termination of the Alert, Site or General emergencies and within 24 hours (MS-pg. 4.1) for an unusual event.

Revise the EALs in Table 4-1 to:

- a. specify as appropriate the specific instrument and readings or other observable (EALs) (don't use general description, e.g., "Various containment pressure and temperature alarms" and don't reference other documents) that will initiate the emergency (e.g., provide the alarm setpoints).
- b. clarify the EAL logic ("and" or "or" conditions for the emergency indicators).
- c. broaden the EALs for the general emergency class to include loss of two of the three fission product barriers and potential loss of the third (to include failure to isolate). This should include the containment radiation monitor readings developed in response to acceptance criterion I.3.a (Figures 1, 2 and 3 in Appendix B of the plan?). In particular, show

how such readings relate to fission product barrier integrity and core melts.

Provide EALs for the following:

1. use of the containment and effluent monitoring equipment discussed in NUREG 0578 (II.I.2),
2. conditions when the effluent monitors are offscale or inoperable,
3. field monitoring results (don't just state they will be used--provide EALs),
4. Doses projected to exceed the lower limits of the EPA PAGs (1/5 Rem) for the projected duration of the release (up to 96 hours). These should be specified for effluent rates, containment levels/leak rate, and field monitoring results.
5. Provide EALs for the ingestion pathway protective actions.

The assumptions used in development of the EALs associated with projected offsite doses (EPA PAGs) must be provided. Unique EALs for each of the "Example Initiating Conditions" listed in NUREG 0610 are not required and may be counter productive. EALs

should represent the minimum set of indicators to identify and confirm the existence of each emergency class (e.g., a single figure relating containment monitor readings to other factors could be the EAL for several general emergency conditions). The relationship of the EAL to the conditions identified in NUREG 0610 must be shown; however, the example conditions can be reclassified to reflect site conditions.

Clearly state that the offsite authorities responsible for implementation of offsite protective measures shall review and shall concur in the EALs.

E.1/2

Specify that if a "general" emergency is declared the responsible site staff member (Criterion B.1) will be directly notified and advised the appropriate authorities responsible for implementation of plume protective measures (Criterion A.1.e) of the recommended protective actions within 15 minutes of the detection of the emergency condition. Specify the content of this initial message to include:

1. class of emergency

2. whether a release is taking place
3. affected areas
4. recommended protective measures

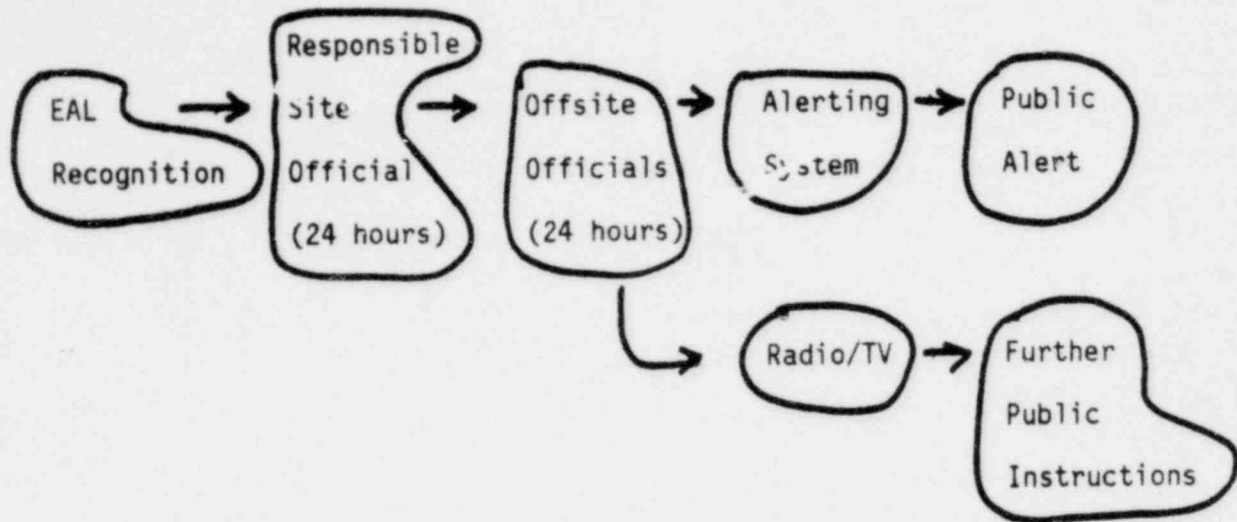
Provide (do not describe) for message verification.

Note: The initial protective measure recommended may be prearranged to be sheltering throughout the plume EPZ with continued monitoring of TV or radio provided further instructions (within 30 min.) are forthcoming indicating more detail protective measure (See Criterion J.7).

E.3/4

Indicate what information would be supplied to the various offsite agencies (by agency and emergency class).





1. initial offsite contact (Criterion A.1.e),
2. physical alerting system (siren, EBS, NOAA, etc.) (Criterion E.6),
3. use of a public media system (Radio, TV) to provide clear instruction to the public (NUREG 0654 Appendix 3),
  - a. 24 hour capability
  - b. total plume EPZ coverage
4. the messages to be transmitted to the public (cover a range of protective actions) (Criterion E.7).

5. a description of how the performance objective specified in NUREG 0654, Appendix 3 are met,
6. a description of the public education program to include information to be provided and means of distribution. (Criteria G.1 & G.2),
7. a statistical survey to verify that public awareness and the corrective measures to be taken if deficiencies are found (NUREG 0654, Appendix 3).

Note: If the public notification system is to be administered by state or local officials it must still be described in the plan.

F.1

Expand Figure 7.1 or provide additional figures to:

1. indicate which communication systems are the primary and backups (not vulnerable to normal power loss or vulnerable to public overloading and diversified) communication links and describe how the backup communications will meet this requirement. Special attention must be given to telephone systems (power and overloading).

Backup communications must be provided to those agencies with roles during implementation of plume exposure protective actions.

2. show the communication links to the authorities responsible for implementation of protective actions (Criterion A.1.a)
3. show the communication links to the alternate site EOC and monitoring teams (to include airborne) (Note: provisions must be made for team communications out to 10 miles)
4. include primary state level agencies (not just initial point of state contact) and contiguous state agencies (ingestion pathway protective action notification)
5. identify the TSC as the primary communication interface with the control room (See NUREG 0654, Appendix 5).
6. Identify a system with adequate capacity which will provide a dedicated link to offsite agencies during emergencies as specified in NUREG 0610 (if telephone system is to be used, discuss how vulnerability to power loss and overloading will be decreased).

The titles of the contacts at both ends of offsite communication links must be identified in the plan.

F.2 Commit to conduct tests of the entire alerting system to include the system used to alert the public and specify the test periods for each part of communication system (e.g., site to local response officials; public notification system).

G.1/2 (See Acceptance Criteria E6).

G.3/4 Describe how the media center (Figure 5-1), site EOC, NUSCO, Public Information Officer (HN-pg. 5-3), and local and state government (NY, Conn.) representatives will exchange and coordinate public information. Describe how public announcements on protective actions will be made during the immediate phases of an accident and time required.

G.5 Provide for inviting the local media to training sessions on:

1. alerting system
2. classification system

3. protective measures

4. public information contacts.

Specify how often the sessions will be conducted and who will be invited.

H.1

Clarify the use of the control room (viewing room) as the onsite Operational Support Center as described in the Hadden Neck plan.

H.2

The site EOC must be further described to include a floor plan indicating the areas to be used by Federal, State and local officials, monitoring teams, corporate management, emergency coordination, and press briefing, etc. Provisions for backup power must be provided if required for communications or dose projections (met. data).

The function of the EOC must include:

- (1) corporate interface,
- (2) state/local interface,
- (3) monitoring team coordination,
- (4) total site emergency response coordination,
- (5) press briefings.

Provision for meteorological data at the Millstone site EOC must be provided and the provision at the HN EOC must be described.

An alternate site EOC located beyond the area where evacuation is most probable must be identified. Describe the provision made to assure that the command/control functions are transferred with out interruption if the primary site EOC must be evacuated (include communications). An initial point of contact for federal assistance interface (site EOC?) for both states must be identified.

H.5/6

(See Criteria D 1/2)

H.9

Provide a description of the supplies located at the centers.

H.10

Section 8.4 of must expanded to explicitly address this requirement. Terms such as "periodic" must be defined (throughout plans).

H.11

Inventories by general category must be provided for:

1. decontamination equipment,
2. first aid equipment.

H.12

Describe the analysis of field monitoring data from both states and the licensee's monitoring efforts and how the data will feed back (as they affect plant operations and protective action determination) to the site EOC and TSC.

I.1

See Criteria D.1/2

Describe how the NUREG 0578 requirements will be incorporated in to the emergency operations (B 5/8, D 1/2). In particular, describe how iodine concentrations are to be determined and factored into the protective action recommendations and how the effluent monitors (all exit pathways) readings will be used as EALs.

I.3.a

The source term requirement should be met by containment radiation monitor readings for the following accident conditions:

- a. release of coolant activity,
- b. release of gap activity,
- c. fuel melt.

Describe the assumptions used in meeting this requirement to include containment leak rate, and meteorological conditions. If Figure 1, 2 and 3 of Appendix B are to be used to meet this requirement:

1. describe how the curves relate to the above conditions.
2. describe "10 CFR 50 Appendix I" assumptions,
3. justify assuming 10% of the iodine inventory in the gap while only 5% is assumed with 1% and 10% of the core.

(Coolant activity should be associated with site Tech Specs. and gap activity should be associated with that described in the FSAR (~ 1% fuel).

#### I.4/6

The methodology described in Section 6.2 for projecting offsite must be clarified or expanded to:

1. describe the assumptions used concerning iodine concentrations (10 CFR 100). Discuss why these assumptions are realistic. Demonstrate that offsite doses projections can be provided (all shifts) in time to allow this consideration in the determination of offsite protective actions (within 30 minutes) (See Criteria E1/2 and J.7).
2. provide for estimating doses based on containment monitor reading and leak rate data,



3. indicate how the weather forecast data (Step a, Section 6.2) will be used,
4. what is the basis for the prepared tables (Step b) used to estimate release rates if instruments are offscale/inoperable,
5. discuss how the results of the field monitoring teams will be used to project doses.

I.6 Describe the provisions to meet this requirement to include the instrument and job aids (tables, etc.) used, the assumptions and response time.

I.7 Describe the provisions to meet this requirement and how the results will be factored in to dose projections and protective action recommendations and how fast results will be available.

I.8/9 Describe the extent of dependence of state officials on licensee offsite monitoring and the licensee's ability and willingness to provide such assistance and how this assistance is requested and coordinated.

Provide for monitoring at least to the site boundary within 30 minutes.

Specify the following information about the offsite monitoring teams:

1. notification coordination methods (how deployed),
2. composition (numbers, titles, qualifications) (B.5),
3. transportation,
4. communications (out to 10 miles),
5. monitoring instruments  
(Note: EAL must be established for e.g., general emergency condition 1 Table 4-1 pages 24(MS), 11(HN)),
6. deployment times out to 10 miles (Both sides of river for Haddam Neck),
7. detection capabilities.

I.9

Describe in sufficient detail to assure adequacy the methodology used to project offsite doses (to include iodine) for:

1. field monitoring data at plant boundry,
2. field monitoring data in EPZ.

Job aids used to perform these calculations such as fill-in-blank forms could be supplied to meet this requirement.

A means for plume location must be described (e.g., aircraft with monitoring team) to include deployment time and interface (communication) with EOC and offsite officials. If outside support is to be used (DOE BNL) written agreements must be provided.

- I.10 Describe the equipment, personnel to be used, and expected response times.
- J.1 Describe how personnel directed to assembly areas, and how these areas are chosen. Specify who is responsible for warnings and the time required.
- J.2 Further describe the provision for plant evacuation to include maps showing evacuation routes and assembly areas. Describe how evacuees will be informed to reassemble beyond the plume EPZ if further monitoring or decontamination is required.
- J.3 Further describe the procedures for monitoring visitors and plant evacuees to include how it will be determined when monitoring is required (contamination is "suspected" Section 6.4.1) and by whom, how fast monitoring can be accomplished (all shifts) and what provisions have been made if plant condition will not allow onsite monitoring.

J.4/K.7

Specify that non-essential personnel will be evacuated in the event of a site or general emergency (not just the exposure levels specified in Section 6.4.1). Clarify MS-Section 4.1.1 which states "site" emergency evacuation will be conducted if "required" (revise Table 6.2 as appropriate). The location at which decontamination can be accomplished as they relate to assembly/monitoring locations must be specified (onsite & offsite).

The provisions for extra clothing and individual decontamination with particular attention given to Iodine skin contamination must be described.

J.5

Commit that personnel accountability can be accomplished within 30 minutes. Describe how this will be accomplished for the Millstone construction workers.

J.6

Specify the provisions made for the use of radioprotective drugs for emergency works.

J.7

Describe how the following will be considered during the determination of the protective actions to be recommended offsite: (See Criteria E1/2 & I4/6)

- a. plant status, NUREG 610 initiating conditions,
- b. local protection factors for typical residential units (Criterion J.10.m),
- c. weather conditions,
- d. evacuation times, (Criterion J.8)
- e. release potential,
- f. projected or potential doses.

Show the relationship between recommended protective actions and the factors listed above. The protective actions must reflect the concepts in the EPA guidance and NUREG 0610 (Key-Hole). The system described in the plans (Section 4.12, 6.4.1 and Table 4.2) by which protective actions will be recommended in accordance with the State of Connecticut classification system is unacceptable; since it is solely based in projected doses and does not take plant conditions into consideration. In addition, the implication in the plans that only towns "downwind" will be notified or recommended protective actions (HN-Figure 5.1, MS Section 4.1.2) is unacceptable. Protective actions must be implemented in all directions using the "Key-Hole" approach.

Commit that the provisions for recommending protective actions will be reviewed by the implementing authorities. This review must be documented.

J.8 Place this information in the plans along with a discussion of how it is used to determine protective actions recommended offsite. (See Criterion J.7)

J.9 Provide for recommending ingestion pathway protection actions offsite. Describe the procedure, the time required, and who is contacted.

J.10.a/b Revise the projected populations distribution provided in the plans to reflect the nomenclature shown in Table J.1. In addition, provide maps in the plan supplying the other information requested.

J.10.c This is addressed by Criterion E.6.

K.2 Identify the member of the emergency organization who can authorize doses in excess of Part 20 and how his/her authorization will be obtained during an emergency. (Radiological Consequence Assessment Manager? If so, who will perform this function until he/she arrives on the backshift?).

K.3.a/b

Describe the provision for 24-hour doses determination and the records to be maintained for emergency workers to include the offsite individuals (e.g., NRC, State officials) who are to arrive on site or at the site EOC. Who performs these functions?

L.1

Describe how the services provided by the Radiation Management Corporation are accessed during an emergency.

L.4

Can 24-hour transportation for Haddam Neck be assured through the use of a "Volunteer" ambulance service? Provide a letter of agreement for ambulance service for Millstone.

M.1/3

Describe the procedure used to relax an emergency condition to include who would make the decision at the local level and onsite.

M.4

Describe the method used to estimate total population dose during accident conditions (Coordinate with state and local agencies).

N.1/2

Provide for the drills and exercises on a schedule as discussed in this criteria.

N.3

Describe the information to be provided in the drill scenarios to include:

1. A basic objective (an objective is measurable and observable) for each major action to be accomplished must be provided. Specify the tasks or function for which objectives will be established such as:
  - a. FAL recognition and reporting,
  - b. accident classification and dose assessment,
  - c. activation of the centers,
  - d. offsite notification,
  - e. response to contaminated personnel,
  - f. ambulance response,
  - g. exercise of the hospital plan,
  - h. simulated evacuation of non-restricted area,
  - i. field monitoring,
  - j. damage control.



2. date, time place(s)
3. simulated events
4. time schedule
5. narrative summary
6. arrangements for observers and their qualifications.
7. How the exercise will be scored (use objectives).

N.4

Provided for qualified state and local observers to critique the exercises and describe the provision for a critique. Describe how they will be prepared to critique the exercises.

N.5

Describe how the results of the exercise requiring plan changes will be handled, who has management control, and how management control will be maintained.

0.1/2

Describe the provisions to identify the crucial emergency tasks performed (not part of normal duties) by onsite personnel and how these personnel will be trained and qualified on these tasks. (B.5/8).

Qualification can be demonstrated on drills and exercises.

Describe the provisions to offer training to the following on their emergency tasks:

1. local response agencies
  - a. fire,
  - b. police,
  - c. ambulance/rescue.
  
2. Agencies responsible for implementation of protective actions.
  
3. local press/media (See Criterion G.5).

0.3 (See Criterion 0.4)

0.4 The categories listed in this criteria must be addressed. The crucial emergency task or function performed under each category must be listed along with the job title of the personnel assigned to perform them as identified in response to Criterion B 5/8 and the frequency of training and qualification. The offsite agencies who report to the site need only

to be trained on areas that are not part of their normal duties (i.e., fire fighter - would receive training on security and radiological procedures).

- 0.5 Specify the specific frequency of qualifications & requalification.
- P.1 Identify as part of the response to Criterion 0.4 the emergency task performed by the individuals responsible for planning (identify by job title) and how qualified.
- P.2/3 Identify the individual responsible for planning and show his/her position in the normal organization.
- P.4 Specify that all the attached plans and agreements will be revised annually and that this will be documented.
- P.5 Commit to provide updated copies of the plan to all holders of the plan, and that revised pages will be marked as required.
- P.6 Is there a corporate plan (NUSCO)? If so it must be provided.

- P.7                    The procedures listed in Appendix D must be referenced to the appropriate sections on the plans.
- P.8                    The index must cover the attached state and local plans to be attached.
- P.9                    Describe who performs the audits and the management controls.