

October 23, 1989

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION
before the
ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
PUBLIC SERVICE COMPANY OF)	Docket Nos. 50-443-OL-1
NEW HAMPSHIRE, et al.)	50-444-OL-1
)	(Offsite Emergency
(Seabrook Station, Units 1 and 2)	Planning and Safety
)	Issues)
)	

AFFIDAVIT OF ANTHONY M. CALLENDRELLO

I, Anthony M. Callendrello, being on oath, depose and say as follows:

1. I am the Emergency Planning Licensing Manager for New Hampshire Yankee. A statement of my professional qualifications are a matter of record in this proceeding. In addition, I have testified before this Board regarding the scope of exercises.

2. This affidavit addresses the Intervenors allegations that the scope of the September 27, 1989 Exercise (1989 Exercise) was so limited that major portions of the plan were not demonstrated.

3. I have reviewed the scope and extent of play of the 1989 Exercise, as well as the Affidavit of S. Joseph Ellis (Ellis

"A"

Affidavit), and have concluded that it was comprehensive enough to permit a meaningful test and evaluation of the onsite emergency plan to determine if that plan is fundamentally flawed. I have also reviewed the allegation of the Intervenor's to determine if the failure to include the events in the 1989 Exercise would have created a situation where a fundamental flaw in the plan would have gone undetected.

4. The Intervenor's in Contention JI-Onsite Ex-2, Basis B, allege that the scope of the 1989 Exercise was deficient because, "Applicants failed to demonstrate mobilization or deployment of their VANS system". Vehicular Alert and Notification System (VANS) is the system developed by New Hampshire Yankee for the alerting of the Massachusetts portion of the Seabrook Station Emergency Planning Zone. As discussed in the following paragraphs, the mobilization and deployment of the VANS is an offsite emergency plan function and therefore would not be performed during an exercise of only the onsite emergency plan.

5. The operation of the VANS is part of the Seabrook Plan for Massachusetts Communities (SPMC) implemented by the New Hampshire Yankee Offsite Response Organization (ORO). SSREP pp. E-6,7 E-9; SPMC (Applicants' Exhibit 42) at 3.2-13.

6. The deployment, mobilization and setup of the VANS are performed in accordance with the procedures contained in the (SPMC). SPMC at Appendix G pp. G-5,11; IP-2.13, IP-2.16.

7. During the 1988 Exercise, the VANS were demonstrated as part of the offsite plans of the NHY ORO. Applicants' Exhibit 61 at 2.3-4 and 2.3-13 (Attached as "A").

8. The Intervenors in Contention JI-Onsite Ex-1, Basis 1 (including the additional bases in Intervenors second motion) allege a scope inadequacy because the 1989 Exercise did not advance beyond a Site Area Emergency and did not trigger sufficient offsite protective action decisionmaking. Regarding the generation of protective action recommendations (PARS), the Ellis Affidavit at paragraphs 10 through 15 states that the appropriate onsite organization members did perform PAR assessments using actual and hypothetical plant and meteorological conditions, formulate PARS and communicate PARS to offsite officials.

9. Even assuming this were not the case, if the exercise scenario did advance beyond a Site Area Emergency classification, the same PAR procedure would have been used. The procedure that is used in the formulation of the PARS has been used during prior drills and exercises, including the 1988 Exercise, that progressed to a General Emergency. Therefore, all that could have been uncovered are individual performance weaknesses that would be solvable by remedial training.

10. The Intervenors in Contention JI-Onsite Ex-1, Basis 3, (including the additional bases in Intervenors second

motion) allege a scope inadequacy with regards to the demonstration of field monitoring teams during the 1989 Exercise. The Ellis Affidavit at paragraphs 16 through 20 states that the teams did perform the monitoring activities called for by their procedures.

11. Even if the allegation that no monitoring activities were performed were true, given the testing of these procedures in three graded exercises, the only issues that could result are those associated with personnel or equipment performance which would be solvable by remedial training, minor hardware improvements or minor procedural improvements.

12. The Intervenors in Contention JI-Onsite Ex-2, Basis A, allege a scope inadequacy because there was no demonstration of an actual shift change or the capability to provide staffing for continuous operations. The Ellis Affidavit at paragraphs 4 through 9 states that the capability to staff second shift positions was demonstrated by the development of rosters. Should the scenario have called for the actual replacement of personnel, all that possibly could have been revealed is a specific performance problem of an individual or individuals (solvable by remedial training) or a physical problem in the ability to mobilize these personnel (highly unlikely since shift turnover occurs 12 hours into the accident) and by its nature readily correctable. The adequacy of the training program is fully evaluated by the performance of the first shift. None of these problems involve a fundamental flaw in the emergency plan.

13. The Intervenor in Contention JI-Onsite Ex-1, Basis 2, allege that the scope of the 1989 Exercise was deficient since it did not involve offsite medical support services. The scenario for the 1989 Exercise did not call for participation of local support services or the offsite medical treatment facility.

14. Consistent with the practice of the past three years, the schedule constraints of the offsite medical facility and the guidance of NUREG-0654 II.N.2.c (Attached as "B"), New Hampshire Yankee conducted the medical drill (involving the local support services and hospital) as an event separate from the 1989 Exercise.

15. Given that three medical drills have been conducted, the only problems that would have been uncovered if it were added to the 1989 Exercise are those associated with personnel performance solvable by remedial training. The plans and procedures have been evaluated and no fundamental flaws would be uncovered.

16. The Intervenor Contention JI-Onsite Ex-1, Basis 4, (including the additional bases in Intervenor's second motion) alleges that the scope of the 1989 Exercise did not involve the offsite monitoring and decontamination of onsite personnel. The 1989 Exercise did not involve a demonstration of the offsite monitoring and decontamination activities at the Seabrook Greyhound Park.

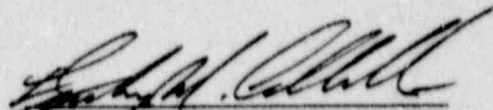
17. The use of the offsite monitoring and decontamination facility

is not a major portion of the plan and is used only in limited circumstances. Specifically, the accident has to have begun at a Site Area or General Emergency, a release must be in progress and the wind must be blowing from between 80 degrees clockwise to 180 degrees (Production Emergency Response Manual procedures ER-1.4 and ER-1.5). For all other conditions, non-essential station personnel are monitored using the normal station radiological control procedures. During the 1989 Exercise, evacuating station personnel exited through appropriate radiological monitoring systems.

18. Demonstration of activities at the offsite monitoring and decontamination facility would not have revealed a fundamental flaw since the equipment and procedures used there are either identical to or based on routine in-plant radiological control procedures. In addition, the personnel who perform these functions are members of the Health Physics department whose normal duties involve routinely performing similar activities. At most, an individual performance problem solvable by remedial training may have been uncovered during a test of the facility.

19. The flaws alleged by Intervenors regarding the scope of the 1989 Exercise did not result in any major portion of the plan not being tested nor would any fundamental flaw result.

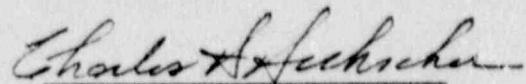
State of New Hampshire
Rockingham County


Anthony M. Callendrello

October 23rd, 1989

The above-subscribed Anthony M. Callendrello appeared before me and made oath that he had read the foregoing affidavit and that the statements set forth therein are true to the best of his knowledge.

Before me,


Notary Public
My Commission Expires:

CHARLES H. HECKSCHER, Notary Public
My Commission Expires February 28, 1990

NEW HAMPSHIRE YANKEE
SEABROOK STATION
1988 FEMA/NRC GRADED EXERCISE

2.3 NHY OFFSITE RESPONSE ORGANIZATION
OBJECTIVE SUMMARY/SUMMARY MATRIX

"A"

by Controllers. Analyses data simulated by scenario data will be given to lab analysis personnel by controllers at both the Mobile Lab located at the NHY Offsite Response EOC and the Yankee Atomic Electric Company Environmental Laboratory. This data will be given to dose assessment personnel, by the lab personnel, for protective action decision making. Lab activities may be conducted out of sequence from the main timeline.

Interjections by controller may occur if ingestion field teams do not return field samples back to the environmental lab in a timely fashion. This will ensure adequate time is available to demonstrate analysis procedures as well.

Plume Dose Projection

10. Demonstrate the ability, within the plume exposure pathway, to project dosage to the public via plume exposure, based on plant and field data.

This objective will be demonstrated at the NHY Offsite Response EOC. Simulated plant and field data will be provided by Controllers to appropriate personnel.

The METPAC computer system will be utilized for dose assessment activities.

Plume Protective Action Decision Making

11. Demonstrate the ability to make appropriate protective action decisions, based on projected or actual dosage, EPA PAGs, availability of adequate shelter, evacuation time estimates and other relevant factors.

This objective will be demonstrated at the NHY Offsite Response EOC. Simulated data will be provided by Controllers.

Alert, Notification and Emergency Information

12. Demonstrate the ability to initially alert the public within the 10-mile EPZ, and begin dissemination of an initial instructional message within 15 minutes of a decision by appropriate State and/or local official(s).

The procedures used to notify the public will be implemented up to actual activation of the Public Alert and Notification System. The Emergency Broadcast System (EBS) will be implemented up to the point of transmission of an actual EBS message. The EBS station will broadcast

NHY OFFSITE RESPONSE ORGANIZATION

Facility	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37		
Ambulance Services (Medical Drill)		X	X	X	X	X										X		X					X	X													X		
Bus Yards		X	X	X		X										X		X	X																				
Congregate Care Centers			X		X																		X ⁴																
Day Care Centers	X	X		X														X	X																		X		
Emergency Operations Center	X	X	X	X	X	X			X ²	X	X	X	X	X	X ³	X ³	X		X	X	X	X	X				X	X	X	X	X	X	X ⁶	X	X	X	X	X	X
Emergency Worker Facility		X	X	X	X																				X													X	
Environmental Analysis Labs		X		X	X				X																				X										
Field Monitoring		X		X		X	X	X	X							X																					X		
Sample Collection		X		X		X	X									X												X											
MS-1 Hospital(s) (Medical Drill)																							X	X ¹															
Newington Media Center	X	X	X	X	X							X	X ³																						X	X			
Monitoring Trailers		X	X	X	X	X																X				X											X		
Nursing Homes	X	X		X												X		X																			X		
Reception Centers		X	X	X	X																	X	X ⁴															X	
Recreational Facilities (DOI)	X			X														X																					
Schools	X	X		X														X	X																		X	X	
Staging Area	X	X	X	X	X	X					X					X		X	X	X						X	X									X		X	
VANS	X			X		X										X																							

- (1) MS-1 Primary Hospital.
 - (2) Particulate analysis to be done at EOC.
 - (3) Phone calls from and to Media/Public Control Cell at 5 calls/hour (minimum) per staff position at Joint Telephone Information Center.
 - (4) The evaluation at CCCs will be limited to evaluation of maps from Reception Center to CCC and evaluation of arrangements of the CCC Landlord for set up and liaison activities.
 - (5) Offsite EOC Liaisons may be deployed to a controlled location and then interface via phone to Federal Control Cell.
 - (6) Total population exposure estimate to be submitted 30-45 days post exercise; participants to discuss methodology to be used during exercise.
- # Errata, Rev. 1, July 1988.

N. Exercises and Drills (continued)

Evaluation Criteria

Applicability and Cross Reference to Plans

Licensee State Local

2. A drill is a supervised instruction period aimed at testing, developing and maintaining skills in a particular operation. A drill is often a component of an exercise. A drill shall be supervised and evaluated by a qualified drill instructor. Each organization shall conduct drills, in addition to the annual exercise at the frequencies indicated below:

a. Communication Drills

Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly. Communications between the nuclear facility, State and local emergency operations centers, and field assessment teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages.

X _____ X _____ X _____

b. Fire Drills

Fire drills shall be conducted in accordance with the plant (nuclear facility) technical specifications.

X _____

c. Medical Emergency Drills

A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by the local support services agencies (i.e., ambulance and offsite medical treatment facility) shall be conducted annually. The offsite portions of the medical drill may be performed as part of the required annual exercise.

X _____ X _____

"B"