



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

TERA

October 24, 1980

Docket Nos. 50-317  
and 50-318

Mr. Arthur E. Lundvall, Jr.  
Vice President - Supply  
Baltimore Gas & Electric Company  
Post Office Box 1475  
Baltimore, Maryland 21203

Dear Mr. Lundvall:

We have completed our review of your emergency plan submittal dated June 1980, for the Calvert Cliffs Nuclear Power Plant. Your plan was reviewed against the criteria stated in NUREG-0654, "Criteria for Preparation and Evaluation of Radiological Emergency Plans and Preparedness in Support of Nuclear Power Plants." This document addresses the standards in the revised 10 CFR 50.33, 50.47, 50.54 and Appendix E which becomes effective November 3, 1980.

Our review has indicated that additional information is necessary and commitments are required before we can conclude that your onsite emergency preparedness program meets our criteria. Enclosed are our review comments for which resolution is necessary. Your emergency plan should be revised to address these comments in accordance with the provisions of the above revised 10 CFR 50 within 60 days.

Sincerely,

A handwritten signature in cursive script, appearing to read "Robert A. Clark".

Robert A. Clark, Chief  
Operating Reactors Branch #3  
Division of Licensing

Enclosure:  
Review and Comments of the  
Calvert Cliffs Emergency Plan

cc w/encl:  
See next page

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Baltimore Gas and Electric Company

cc:

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CALVERT CLIFFS EMERGENCY PLAN  
REVIEW COMMENTS

The below listed portions of your Plan need further explanation as indicated:

1. Page 1.4-1, Section 1.4.1 of the submission, Definitions - An accident is defined as "any unfortunate, unforeseen, or unintentional occurrence or mishap resulting in...physical injury or injury due to radiation... Specify why only injury - an accident need not involve an injury.
2. Page 2.1-1, Section 2, Emergency Conditions, line 1 - Please clarify the type of "formal" training the operating staff will receive. Also specify the type of specialized training each individual will receive, when initial training will be given, and the schedule for periodic training. Define the scope, nature, and frequency of training.
3. Plan page 2.2-3, Consequences of Postulated Accidents, Radioactive Contamination, Personnel:
  - a. define "pre-set limits," line 1
  - b. line 2, paragraph 2 should be clarified. It does not appear that contaminated injured personnel, requiring immediate treatment, have been considered in this statement.
4. Define the terms "trivial incidents" and "sufficient amounts" as used in Section 2.2.1.2, paragraph 1, page 2.2-4.
5. Section 2.2.1.2, page 2.2-5, paragraph 2, line 3 - Specify under what conditions it would not be "feasible" to dispatch monitoring teams to quantify the release magnitude.
6. Section 2.2.1.7, page 2.2-18 - Specify the types of "immediate efforts" that will be made to prevent the spread of airborne contamination.
7. Section 2.2.1.7, page 2.2-18, paragraph 2, last sentence - Clarify the term "appropriate measures."
8. Section 2.2.1.10, page 2.2-22, paragraph 1 - Describe the types of "normal radiation safety practices and procedures" that will "protect" personnel from radiological consequences.
9. Section 3.2, paragraph 1, page 3.2-1 - Specify what is considered a "sufficient period" for shift self-reliance.
10. Section 4.1.2, page 4.1-3 - Define the underlined term substantial.
11. Section 4.2.1.7, page 4.2-11, paragraph 3 - Specify the term "appropriate."

12. Section 4.4.1.6, page 4.4-9, item (2)(A) - Describe in detail the "program" referred to.
13. Section 4.4.1.1 Levels of radioactive contamination would be more meaningful if it were put into table form with categories to be decontaminated (i.e., personnel, equipment, supplies, contaminated areas, etc.) on one axis and the level beyond which decontamination is required in counts per minute of Beta, gamma or alpha per 100 cm<sup>2</sup> on the other.
14. Section 4.4.1.11, page 4.4-12 - Describe the "means" provided for caring for minor or serious injuries.
15. Section 4.4.1.12, page 4.4-12 - Clarify what "precautions" will be taken regarding impending natural emergency conditions.
16. Define the Acronym "PRM."
17. Section 6.1.2, page 6.1-11 - Define the term "periodically" regarding training and drills. Specify the period in months.
18. Section 6.1.2, page 6.1-14, paragraph 1 - Specify who the "observers" will be.
19. Section 2(b)(2), page B-3 - Define and give examples of "major" and "minor" injuries.
20. Section 2b(3), page B-3, line 2 - Define the term "significance."
21. Section 2c(1), page B-4 - Define the term "critical."
22. Page C-4, items 5 and 6 - The terms "either" and "or" are too ambiguous. Restructure to make the instructions more definitive.
23. Page C-12, item B - Define the acronym POSRC.
24. Page G-1.2, paragraph 2 - Where each "will be" statement is made, provide a schedule for purchase, installation, testing and completion.
25. Page G-1.2, paragraph 1 - "...prevailing atmospheric stability condition from current site meteorological measurements (or from other data if site measurements are not available)..." is too ambiguous. Please clarify and be specific.

The following comments are listed in the same order as the criteria set forth in NUREG-0654.

SECTION A - ASSIGNMENT OF RESPONSIBILITY - NUREG-0654

NUREG-0654  
Criteria

- A.1a&b 1. Identify by title the local authorities responsible for implementing protective actions within the plume and ingestion EPZ's. The plan must identify all the state level agencies with emergency roles. Your Plan does not identify Virginia, Delaware or the District of Columbia, yet these entities are within the 50-mile EPZ. (Provide a map showing jurisdictional boundaries.) Describe the concept of your operations and its relationship to the total effort. Illustrate these interrelationships in a block diagram.
- 2a 2. Section 3, as part of the primary duties of the EDO (Site Emergency Director), which may not be delegated, include the decision to notify and make recommendations to the authorities responsible for implementing offsite emergency measures.
- 2a 3. Section 4.4.1.6, page 4.4-9, item (2)(C) - Specify the agreed upon action to be taken by the Maryland Department of Health and Mental Hygiene.
- 3 4. Appendix D, letters of agreement with organizations having an emergency response role within the Emergency Planning Zone must be included in your plan. They should identify the emergency measures to be provided, the mutually acceptable criteria for their implementation, the arrangements for exchange of information, and any limits on the actions of these organizations.
- 5 5. Identify by title the personnel qualified for assignment to the site Emergency Director position, and the specific conditions under which the on-call SED may assume this function.
- 7 6. Section 3.2, page 3.2-1 - Specify how plant personnel are designated and trained to augment the shift operating personnel. State who will train them, the trainer's qualifications, where they will be trained, and training frequency.
- 10 7. Specify the supporting services provided by local fire fighting organizations in accordance with the criteria in Section II.B.10 of NUREG-0654. A copy of the written agreement documenting the arrangements shall be appended to the plan.
4. 8. Describe in detail your capability to provide continuous (24-hour) operations for a protracted period of time.

SECTION B - ONSITE EMERGENCY ORGANIZATION - NUREG-0654

NUREG-0654  
Criteria

- 1        1.    Calvert Cliffs is a two unit facility. In the event of an emergency it is unclear how conditions will be resolved. Please clarify:
  - a.    How the unaffected unit's crew will maintain the safe operations of the unaffected unit and not be diverted to assist the crew of the affected unit.
  - b.    The confusion created by the emergency will be minimized to prevent the unaffected unit's crew from making mistakes.
  - c.    Define the relationship between the onsite normal staff component and the onsite emergency organization.
  
- 3        2.    Specify the line of succession for the Emergency Duty Officer and specific conditions under which a higher level official may assume the role. This should be a multi-step line of succession.
  
- 5        3.    Section 3.2-1 - Specify the qualifications to be met for each person assigned to a functional area for emergency activities, such as Site Emergency Director, the initial training they will receive to fulfill the duties of the position, the type and frequency of retraining.
  
4.    Identify the Emergency Director functional responsibilities that cannot be delegated.

TABLE B-1 - MINIMUM STAFFING REQUIREMENTS

1. Table 3.1-1 of the plan indicates an augmenting force of 24 rather than 26 people specified in Table B-1 of NUREG-0654. The shortages in this table are 1 notification and communications person and 1 electrical maintenance/instrument control technician. In addition, the response time for augmentation is 60 minutes, as opposed to the required 30 minutes. State how you will meet the 30 minute response time and a 26 person augmenting force criteria. Please commit to the purchase, installation and testing of equipment to meet this criteria.
2. Page B-13, item 4 - The 3 to 4 hours' response time is inadequate.

There cannot be a 3 to 4 hour lapse in time for medical treatment. You must therefore make alternative arrangements to have adequate medical treatment readily available. You may want to approach University Hospital in Baltimore again and arrange for them to take care of seriously injured, contaminated patients, while those not as seriously injured could be treated at a local hospital facility.

SECTION C - EMERGENCY RESPONSE SUPPORT AND RESOURCES - NUREG-0654

NUREG-0654

Criteria

- 1        1. Describe your arrangements for support with the Department of Energy (DOE) Regional Coordinating Office responsible for implementing the DOE Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP) including the following:
  - a. Specify persons authorized to request RAP/IRAP assistance;
  - b. Make arrangements for using RAP/IRAP teams and equipment; and
  - c. Identify the available RAP/IRAP resources relied upon.
  
- 2        2. The Plan provides for notification of the EOC Coordinator at the Alert Stage. At the Site Emergency Stage, a representative from CCNPP will be sent to the EOC. The Director of the Environmental Health Administration will proceed to the County EOC at Prince Frederick County. Please clarify when these events will occur.



SECTION D - EMERGENCY CLASSIFICATION SYSTEM - NUREG-0654

NUREG-0654  
Criteria

1

The Alert Classification

1. Does not address on-going security threats or loss of physical security.
2. Does not address toxic gases and explosion that will effect occupancy safety systems of the facility.

The Site Classification

1. Fires involving safety systems are not addressed.
2. Expand the initiating conditions used to declare the four categories of emergencies to include all of the example conditions set forth in NUREG-0610. Also provide specific Emergency Action Levels for the above.
3. Modify your plan to show the EAL criteria used to initiate notification. These criteria are to be determined by instrumentation located in the control room or direct observation. Your plan shall be modified to state that once these criteria are met the alert classification action will be initiated. The criteria should not be initiated after verification but as soon as these criteria are met as determined by observable instrument readings in the control room.

SECTION E - NOTIFICATION METHODS AND PROCEDURES - NUREG-0654

NUREG-0654  
Criteria

- 1 1. In the case of a general emergency, your plan is unclear as to how the local offsite authorities responsible for implementing protective measures within the plume exposure Emergency Planning Zone are notified. The potential 15-minute delay in awaiting followup communications from the State before you directly notify the locals is inconsistent with the design objective to complete the notification of the affected population within 15 minutes of your initial call to the offsite authorities. To provide reasonable assurance that this design objective will be met, revise your plan to provide for direct notification to the appropriate local authorities. Also, your plan should clearly identify the local authorities involved including the appropriate county and/or township officials and the U.S. Coast Guard and/or State marine police.
- 1 2. Confirm the existence of a message authentication scheme when notifying offsite authorities of an emergency. Be explicit.
- 2 3. The concept of waiting for actual offsite measurements before implementing protective measures is unacceptable. If the public notification system is to be administered by state or local officials, it must still be described in the plan. Be specific. Do not just reference implementing procedures.
- 4 4. Include in your plan, provisions for written messages intended for the public that are consistent with your emergency classification scheme. These messages should provide specific protective actions to be taken by the occupants of affected areas. These messages should be located at the media center or Emergency Operations Facility.
- 4 5. Provide a standard format for the initial and followup emergency messages that will be used when contacting offsite authorities. The message content should be based on the information requirements specified in Section II.E.3 and 4 of NUREG-0654.
- 6 6. Section 3.2.1.8, page 3.2-8, paragraph 2 - You discuss immediate notification procedures and refer to figures 3.2-2 and 3.2-3. Nowhere in your plan do you discuss public notification systems, such as sirens, or discuss how you will ensure the public is notified. It is the utility's responsibility to insure public notification. Describe the means of public notification signals to be used and how you will ensure public notification. Your plan must describe a public notification system that includes:

- a. The initial offsite contact responsible for notifying the affected population (either the specific organization or individual).
- b. The capability for 24-hour per day notification (to offsite authorities).
- c. The physical alerting system to be used; i.e. sirens, NOAA weather of emergency alert, emergency broadcast system, telephone automatic dialers, aircraft with loud-speakers, etc.
- d. The basis for any exceptions (e.g., for extended water areas with transient boats or remote hiking trails) must be documented.
- e. The plan must provide for an annual statistical sample of the residents of all areas within the 10 mile EPZ to assess the public's awareness of the prompt notification system and the availability of information on what to do in an emergency.
- f. Plan must include a provision for corrective measures to provide reasonable assurance that coverage approaching the design objectives is maintained.
- g. The provisions for use of a public media system (Radio, TV) to provide clear instructions to the public.
  - (1) 24-hour station - total plume coverage
  - (2) Include in the plan the messages to be transmitted to the public covering a range of protective actions.

(It is the utility's responsibility to ensure that the means exist for notifying and providing prompt instructions to the public. It is the responsibility of the State and local governments to activate the system.)

- h. Describe the means to be provided for informing the transient population within the plume exposure EPZ as to how they may be notified and what their initial action should be in the event of a serious emergency.
- i. Describe in detail your redundant communications channels.
- j. Submit examples of the message contents.

SECTION F - EMERGENCY COMMUNICATIONS - NUREG-0654

The Plan does not detail a system for communicating with the NRC. References to communications with the NRC have not been specific regarding contact with Bethesda Headquarters and/or the Regional NRC office. The information needs to be discussed. Also the communications sections of the Plan should discuss the means of communication among the licensee's onsite and offsite teams and between licensee and offsite agencies. Who notifies the FAA? Provisions for testing all notification links to all offsite organizations and public agencies. It is not clear how notification will take place to all privately contracted services. The ability to provide 24-hour notification need to be explained.

SECTION G - PUBLIC INFORMATION - NUREG-0654

NUREG-0654  
Criteria

- 2            1. As part of your public information program, identify a company point of contact whereby the public may obtain additional information.
  
- 3a&b        2. Identify the principal contact points for the news media within your organization and the arrangements for the timely exchange of information with designated spokespersons for each principal organization.
  
- 5            3. Describe your provisions for conducting an annual program to acquaint the news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.
  
4. Discuss plans for emergency dissemination of information to the public.

SECTION H - EMERGENCY FACILITIES & EQUIPMENT - NUREG-0654

NUREG-0654  
Criteria

- 1 1. Section 5.2.1, page 5.2-2 describes the "Startup/Physics Test Panel" that is to be installed in the TSC. Submit a schedule for purchase and installation.
- 1 2. Describe in detail the TSC. Include a floor plan of the facility. The TSC must have a separate space for private NRC consultations, and shall be large enough to house 25 persons. Your description does not convey this information or the information described in NUREG-0696.
- 2 3. Each operator shall establish an EOF. A map showing its location must be provided along with a floor plan indicating the areas to be used by state and local officials. Provisions for backup power must be provided if required for communications or dose projections. The EOF must comply with the descriptions specified in NUREG-0696.
- 5 4. In the Plan there is no discussion of offsite geophysical monitors, page 45 of NUREG-0654. Submit this information in detail.
- 5 5. Criterion 8, page 46 of NUREG-0654 requires that the instrumentation for meteorological measurements comply with the criteria in Appendix 2 of NUREG-0654. There is no discussion in your plan regarding redundant power sources for the meteorological equipment as required in Appendix 2, page 2.2, item 4 in NUREG-0654. The use of the naval facilities 15 miles away is unacceptable. Provide a commitment and schedule for implementing the meteorological criteria set forth in Appendix 2 of NUREG-0654.
- 5 6. Page G.1-5, III - Specify who makes the "decision" regarding the appropriate meteorological stability?
- 5 7. Submit a discussion of your plan's hydrological monitoring, page 45 of NUREG-0654.
- 6.c 8. Section 4.2.1.1, page 4.2-2, does not clearly define how you will make your determination of the magnitude of radioactive material releases. Please specify how determinations will be made, what backup measures are available and where these instruments are located.
- 5 9. There should be 40 TLD positions; you have not specified nor identified these location, see page 45 of NUREG-0654.

- 5            10.    Figures 4.2-1 and 4.2-2 show the location of your monitoring points. Please specify what type of monitoring occurs at each location.
- 5            11.    Section 4.2.1.7, page 4.2-5 - Specify what the environmental radiological monitoring program will include.
- 6.c         12.    Section 4.2.1.6, page 4.2-6 - Specify the types of samples to be taken, how they will be collected, where and how they will be analyzed, and by whom.

SECTION I - ACCIDENT ASSESSMENT - NUREG-0654

NUREG-0654  
Criteria

- 1        1.    Section 2.2.1.2 - Specify what actions will be taken to determine the levels of contamination that existed offsite after the release occurred, but before the discovery of the release. Identify the system with immediate response characteristics that can be interpreted to determine the magnitude of a release.
  
- 8        2.    Describe your capability and resources for field monitoring within the plume exposure Emergency Planning Zone including the methods, equipment, and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through the liquid or gaseous pathways. Your description should address activation criteria, means of notification, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.
  
- 10      3.    Describe your means for relating measured field contamination levels to dose rates for key isotopes and gross radioactivity measurements. Also describe your provisions for estimating an integrated dose from these measurements and comparing these estimates with protective action guides.



SECTION J - PROTECTIVE RESPONSE - NUREG-0654

NUREG-0654  
Criteria

- 2
1. Specify the time required to warn, advise and evacuate individuals such as visitors, contractor/construction personnel and members of the general public who may be within the exclusion area.
  2. Figure 4.4-1 shows some evacuation routes; however, the information submitted regarding evacuation is not adequate. Identify evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density, and specific radiological conditions. The plan must describe how evacuees will be informed to reassemble if further monitoring or decontamination is required. You should include:
    - a. Maps showing evacuation routes, sectors, relocation centers in host areas, shelter areas, hospitals, and other medical facilities.
    - b. Population distribution around the nuclear facility using the format specified in Table J-1 of NUREG-0654.
    - c. Means of notifying all segments of the transient and resident population within the plume exposure EPZ. A simple reference to the State Plan is not acceptable. This material and information must be part of your emergency plan.
- 8
- d. Include as an appendix to your plan the time estimates for evacuation within the plume exposure EPZ. Discuss how this information is used to determine protective actions recommended offsite. Do not refer to State Plan. A copy of time estimates for evacuation should be appended to the plan.
- 3.
3. In Section 4.4.3.2, item 4, you discuss radioprotective drugs and where they will be stored. Describe the arrangements for issuing and administering radioprotective drugs (e.g., individual thyroid protection) for onsite and offsite personnel. Specify under what conditions it would be impractical to administer SSKI p. 4.4-21.
- 10
4. Section 3.4.3.3, page 3.4-11 - You refer to Appendix D regarding boat traffic control. In our copies of Appendix D there is no such information. Please submit the necessary information. Section 4.4.1.6, page 4.4-9, item (2)(B) - Describe in detail how persons "will be warned away."

- 5 5. Describe your capability for accountability of onsite personnel within 30 minutes of the start of an emergency.
- 7 6. Identify your mechanisms for recommending protective actions and the specific state and local authorities to be contacted.
- 10c 7. Identify methods and means for notifying the transient and resident populations in the plume exposure pathway.
- 101 8. Provide time estimates for evacuation within the plume EPZ.
- 10d 9. Describe provisions for protecting persons with impaired mobility.
- 10d 10. Discuss expected local protection (i.e., reduction factors afforded in residential units for indirect and inhalation exposure in the case of sheltering).

SECTION K - RADIOLOGICAL EXPOSURE CONTROL - NUREG-0654

NUREG-0654  
Criteria

- 2            1. Describe the radiation protection program you will implement during emergencies including the individuals, by position or title, who can authorize emergency workers to receive doses in excess of 10 CFR Part 20 limits. Your description should confirm the existence of predetermined procedures for permitting onsite volunteers to receive radiation exposure in the course of carrying out lifesaving activities, including provisions for expeditious decision making. Specify whether or not emergency workers, other than company employees, will be included in the dosimetry program. Section 4.5.2.1, page 4.5-3 - Specify the time frame in which the doses of 100, 200, and 300 Rem can be received.
  
- 3.a&b       2. Describe your provisions for round-the-clock capability to determine doses received by emergency personnel, including the provisions for distribution of dosimeters and maintaining dose records.
  
- 5.a&b       3. Paragraph 2.2.1.1.2, Equipment - Although "...it is not considered likely that contaminated equipment will inadvertently be taken offsite" under emergency conditions the chances are increased that this may occur. Describe the added precautions you have instituted to ensure that contaminated equipment will remain onsite during an emergency.
  
- 3a           4. Describe your provisions for ensuring that emergency workers are issued both self-reading and permanent record dosimeters.
  
- 5b           5. Discuss your capability to decontaminate relocated onsite personnel, including provisions for extra clothing, skin decontamination that is radioiodine contaminated.

SECTION L - MEDICAL AND PUBLIC HEALTH SUPPORT - NUREG-0654

NUREG-0654  
Criteria

- 2        1.    Page 8-15, item 5 - State who handles the contaminated patients.
- 2        2.    Section 2.2.1.11, page 2.2-22, paragraph 1 - Specify how the contaminated patient will be covered, with what type of material, and who will perform this act, so as to not further injure the patient.
- 2        3.    Section 2.2.1.11, page 2.2-22, paragraph 2 - Specify where the "company's medical consultant" will be when asked to determine if "further medical treatment beyond first aid" will be required (i.e., onsite, corporate headquarters).
- 3        4.    Section 3.2.2.4, page 3.2-17, item (6) - Specify the types of bioassays that will be taken.

SECTION M - RECOVERY AND REENTRY - NUREG-0654

NUREG-0654  
Criteria

- 1        1. As part of your recovery and reentry planning, describe the means by which decisions are reached to relax both onsite and offsite protective measures.
- 1        2. Describe your provisions for onsite decontamination control measures including area access control, drinking water and food supplies, and the criteria for permitting return of areas and items to normal use.
- 3        3. Describe the 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.
- 2        4. Specify the position or title of individuals in the recovery organization other than the Vice-President - Supply.
4.       5. Describe your method for periodically estimating total population exposure.

SECTION N - EXERCISES AND DRILLS - NUREG-0654

NUREG-0654  
Criteria

- 1a        1.    Provide a commitment to conduct an emergency response exercise prior to the issuance of an Operating License in accordance with Section II.N.1 of NUREG-0654. The exercise shall include mobilization of State and local personnel and resources, and a scheduled critique by Federal and State observers.
  
- 2            2.    The section of your plan dealing with drills and exercises should include additional details with respect to their scope and nature as set forth in Section II.2 of NUREG-0654. For example, the radiological monitoring drills should indicate provisions for the collection and analysis of all sample media, the medical emergency drill should indicate provisions for participation by the local support services such as ambulance service and the offsite medical treatment facility.
  
- 2a          3.    Revise your monthly communications drill to include the local governments within the plume exposure Emergency Planning Zone.
  
- 2a          4.    Describe the provisions in the annual communications drill for communications with the Federal emergency response organizations and the States within the ingestion pathway.
  
- 3f          5.    Specify who will be considered "qualified" drill and exercise observers.
  
- 2e          6.    Discuss the radiological monitoring drills specified.
  
- 3a-f        7.    Discuss the exercises and drill scenario details.

SECTION 0 - RADIOLOGICAL EMERGENCY RESPONSE TRAINING - NUREG-0654

NUREG-0654

Criteria

1. Describe the training provided for, and/or the qualifications of, the personnel responsible for your emergency planning effort. Specify:
  - a. that training will be documented and annually assessed for suitability.
  - b. that your formal training program includes testing to determine individual qualification, and if a minimum level of competence has been established for any of the positions having an assigned emergency response role.
- 2 2. Additional detail is required on your training program for personnel who will implement the radiological emergency response plans. Your description should include the specialized initial training and periodic retraining programs (including the scope, nature, and frequency) for each of the nine categories of personnel listed in Section II.0.4 of NUREG-0654.
- 4 3. Section 3.2.2, page 3.2-12 - Specify the training and qualifications of each emergency team leader and team member, Emergency Communicator Site, Emergency Director.
- 4 4. Section 4.4.1.7, page 4.4-10 - Describe the fire fighting training your personnel will receive.
- 4 5. Page B-17, paragraph 3 - Specify who trains the Maryland State Police, ambulance and helicopter operators as to how to handle contaminated patients.
- 4 6. Section 4.5.2.1, page 4.5-3, item (5) - Specify the respiratory protection training personnel will receive.
- 4 7. Section 2d(3), page B-5 - Specify what qualifications the aid persons have that will permit them to diagnose injuries, other than the Red Cross multimedia course.
- 4 8. Describe emergency response training at the company corporate level.

SECTION P - RESPONSIBILITY FOR PLANNING - NUREG-0654

NUREG-0654  
Criteria

1. Section 3, page 3.1-2, paragraph 2 discusses the Maryland State actions regarding the plume and ingestion planning zones. The State of Virginia and the District of Columbia are within the ingestion planning zone. Specify what actions these government entities will take and submit copies of the emergency plans for the States of Virginia and Maryland, Washington D.C. and the Virginia counties of Westmoreland, North Umberland and King Georges.
- 6 2. Section 2.2.1.4.1, page 2.2-8, paragraph 2, last sentence - Submit copies of the Maryland State Police and Department of Health and Mental Hygiene procedures for coping with accidents involving vehicles carrying radioactive materials.
- 1 3. Describe the training of individuals responsible for the planning effort.
- 2 4. Identify by position or title in the Company Organization the Emergency Planning Coordinator.
- 4 5. Specify the method and means for forwarding approved changes in the Plan to organizations and individuals responsible for Plan implementations.
- 7 6. List by title of the procedures required to implement the Plan.
- 8 7. Submit an index specifically relating contents of the Plan to the evaluation criteria in Part II of NUREG-0664.
9. 8. Describe arrangement for and conduct of an independent bi-annual audit of the operator's emergency preparedness program.