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RELATED CORRESPONDENCE



UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)	
)	
METROPOLITAN EDISON COMPANY)	Docket No. 50-289
)	(Restart)
(Three Mile Island Nuclear)	
Station, Unit No. 1))	

LICENSEE'S TESTIMONY OF EUGENE F. KNOPF,
WILLIAM GALLAGHER AND ORAN HENDERSON RELATING TO EMERGENCY PLANNING



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OUTLINE

This testimony describes the assistance provided by Kline, Knopf & Wojdak (Emergency Management Services, Inc.), as Licensee's consultants, to municipal and county governments for the purpose of upgrading emergency preparedness around Three Mile Island. The testimony also explains the interrelationships among the various levels of government, both in response to an actual emergency and during the planning stage.

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TESTIMONY

By Witness Knopf:

My name is Eugene F. Knopf. I am President of Emergency Management Services, Inc. ("EMS") and a general partner in Kline, Knopf & Wojdak, a Harrisburg consulting firm. EMS is a wholly owned subsidiary of Kline, Knopf & Wojdak, with offices at 111 State Street in Harrisburg. EMS provides consulting services for emergency planning and emergency operations management. Appearing with me today are General William Gallagher and Colonel Oran Henderson, both employed by EMS. We jointly have prepared this testimony. Copies of our statements of professional qualifications are attached.

At the time we undertook to provide radiological emergency planning assistance to entities in the plume exposure pathway emergency planning zone ("EPZ") around Three Mile Island ("TMI"), which is the subject of our testimony, the services we provided were performed by the general partnership of Kline & Knopf. EMS evolved from the work of that partnership.

History of the Project

In November 1979, Licensee retained Kline & Knopf as government relations consultants. Emergency planning is one of the areas which Licensee raised in its early discussions with

Kline & Knopf. Several factors were considered in the deliberations.

(1) An important conclusion of the Kemeny Commission was that "planning for the off-site consequences of radiological emergencies at nuclear power plants has been characterized by lack of coordination and urgency."

(2) The NRC was considering new guidelines for state and local governments on emergency planning, requiring greater coordination between the licensee plan and state and local plans, as well as additional requirements for emergency planning prior to issuance of an operating license.

(3) Effective emergency preparedness would require linkage between the Pennsylvania Emergency Management Agency ("PEMA"), the counties, the municipalities and the TMI-1 facility. PEMA has statutory authority for emergency planning, but lacked the manpower to promptly revise its own plans and render planning assistance to the five counties and 38 municipalities within the TMI plume exposure pathway EP2.

We concluded that outside expert advice and assistance to the counties and municipalities within the plume exposure pathway EP2 would be necessary if emergency preparedness was to progress within a reasonable time frame. In the interest of public safety and to assure full compliance with licensing requirements in the area of emergency planning, Licensee decided to make available emergency planning consultant services to all counties and municipalities within the TMI

plume exposure pathway EPZ. In light of Kline & Knopf's knowledge of emergency planning and previous emergency management experience, Licensee asked that the firm undertake to provide those services. We agreed to do so.

To secure the necessary concurrence of the state, Mr. Kuhns, Chairman and Chief Executive Officer of General Public Utilities Corporation, Mr. Kline and I met with Lieutenant Governor Scranton and Colonel Henderson, PEMA Director, on March 5, 1980. Governor Scranton gave his full support to the project and instructed Colonel Henderson to provide us with the support necessary to carry it out. The project commenced on March 10, 1980, and was completed 26 weeks later, on September 8, 1980.

I served as project director. The four member planning team consisted of General William Gallagher as team leader, General Hugh Niles as assistant team leader, Colonel Adolph Belser and Colonel Ralph Hippert. General Gallagher and General Niles have had extensive military and civilian emergency operations and emergency planning experience. They know the emergency management structure of the Commonwealth as well as anyone. Gallagher was Deputy Adjutant General of the Pennsylvania National Guard after a long active army career, and Niles was Chief of Staff of the Pennsylvania Army National Guard at the time of the TMI-2 accident. Mr. Kline, as Lieutenant Governor, and I, as his executive assistant, worked with them regularly over a period of eight years in numerous

emergencies, including Hurricanes Agnes and Eloise. Colonel Belser was Chief of Staff of the United States Army War College with 34 years of distinguished military service, and Colonel Hippert served on the faculty of the United States Army War College with 32 years of distinguished military service. Colonels Belser and Hippert are now serving with General Smith, the present PEMA Director.

By Witnesses Knopf, Gallagher and Henderson:

To prepare the Team for its mission, Licensee provided a series of briefings and an extensive tour of the facilities on Three Mile Island. The Team was then briefed by the Pennsylvania Emergency Management Agency, on PEMA's mission and resources, and a review of the Commonwealth's Emergency Plan. The briefings also included an explanation of PEMA's role in any emergency, as this role is coordinated with the roles and responsibilities of other departments of the Commonwealth, and with those of appropriate Federal agencies. PEMA also acquainted the Team with the various provisions of NUREG-0654, then in draft form. The Emergency Management Agency Coordinators of Dauphin, York, Lancaster, Cumberland and Lebanon Counties also attended the PEMA briefings, and reported on the status of the plans in their counties.

Following the series of orientations, meetings, and briefings described above, the Team developed a Worksheet, which included more than one hundred items, posed in question

form, responding to various criteria and elements of NUREG-0654 relating to emergency preparedness at the local level. The Worksheet was designed to provide local emergency planning coordinators with a check-list, to which they could compare their plans, to ensure that no essential elements were overlooked in the development of local plans.

To further expedite the efforts of the local coordinators, the Team developed a Model Municipal Plan, whose various sections were designed to meet those parts of the March 1980 revision of NUREG-0654 which pertained to local planning.

The Kline & Knopf Model Plan includes the following parts:

- I. Authority
- II. Purpose
- III. Situation
- IV. Organization (of the Coordinator's Emergency Operations Center Staff)
- V. Responsibilities (of each member of his staff)
- VI. Concept of Operations (covering each phase from warning, to an evacuation ordered by the Governor)
- VII. Public Information
- VIII. Resources needed to support the plan

The Model Plan also includes the following appendices:

1. A Sample Organization Chart
2. A Sample Floor Plan for an Emergency Operations Center
3. An Emergency Notification List
4. List of those individuals requiring evacuation by ambulance or in need of life support equipment

5. Siren Coverage Map
6. Alert Sector Map
7. Alert Teams Composition
8. Main evacuation routes; traffic control points; pick-up points; and assembly areas
9. Resources Requirements Form (in which the local coordinator records the additional resources necessary to accomplish his mission; this list is submitted to the County Emergency Management Agency Coordinator to incorporate in his planning.)
10. Public Information Sheet

The Model Plan is in narrative form, with appropriate blocks to be filled in by the local emergency planning coordinators, who are familiar with local resources.

Assistance to Municipalities

With the aid of the Model Plan and the Worksheet, our Team began its planning assistance sessions in the various communities within the plume exposure pathway EPZ. In addition to the Coordinators and their Deputies, in many instances, Township or Borough elected public officials also attended the planning session.

The sessions, held in the Emergency Operations Centers, were conducted as shirt-sleeve working sessions. At the sessions, the coordinators were fully oriented to the essential elements of a local plan, through page-by-page review of the Model Plan and Worksheet. Although the Model Plan was in a "fill in the blank" format, the Model Plan was used only as

guidance, with emphasis on the importance of the development of each plan to meet the specific conditions of the local entity it is to serve.

The Team did not presume to act as teachers, but rather as temporary members of a coordinator's staff. The Team, of course, benefited from its knowledge of the PEMA plan and the standards of NUREG-0654, and shared its knowledge with local officials. The Team reviewed progress made on plans and offered comments on the development of those plans for approval by local officials and the County Coordinator. At the close of each initial planning session, the Team would offer to return as many times as the local coordinator deemed necessary. Even when no further planning sessions were requested, the Team would follow up by telephone calls to inquire as to the status of completion of a particular community's plan and to offer further assistance, right up to the terminal date of the contract.

During the March-September 1980 period, the Team conducted planning assistance sessions in all 38 municipalities located within the plume exposure pathway EPZ. In March 1980, only one of the 38 had a complete and approved plan. At the end of the Team's effort, the five risk County Emergency Management Agency Coordinators reported that 25 of these 38 municipalities had their emergency preparedness plans approved by their Borough Councils or Township Boards of Supervisors.

Assistance to Special Facilities

Early in our work with local coordinators, Licensee and Kline & Knopf decided to extend the Team's activities to offer emergency planning assistance to special facilities such as schools, nursing homes, hospitals and prisons. A need for a greater degree of coordination between school districts and other political subdivisions was identified as a major concern.

In March 1980, the Dauphin County Emergency Management Agency Coordinator requested that the Team contact the Lower Dauphin School District Superintendent and offer emergency planning assistance. The Superintendent welcomed the Team's help in a project he was just starting, the preparation of an "Emergency and Disaster Administration Plan" which he hoped would serve as a model plan for all School Districts located within a ten-mile radius of TMI.

The Team met with the Lower Dauphin School District Superintendent in several shirt-sleeve sessions as the plan moved to completion; met periodically with PEMA and Department of Education officials to keep them apprised of the plan's progress; met with the Superintendent when he briefed the other Dauphin County school district superintendents on the details of his completed plan; assisted him in briefing the Lower Dauphin School Board, which approved his plan; and accompanied him to a meeting at the Department of Education, where he briefed the Secretary of Education and the TMI Planning

Committee, composed of representatives of all fourteen school districts within the plume exposure pathway EPZ.

At the meeting of the Superintendent with the Secretary of Education, the Secretary decided that copies of the Lower Dauphin School District Model Plan, as well as copies of his own Department's "School Emergency Planning Guide" would be printed and distributed -- as training aids -- to the more than 500 school districts throughout the Commonwealth. This distribution was completed in December 1980. Other school districts within the TMI plume exposure pathway EPZ, such as Steelton-Highspire, have since adopted emergency plans.

Team Participation in PEMA Exercises

The Planning Team acted as observers in the PEMA Table Top Exercise on April 30, 1980. This exercise posed certain problems emanating from a hypothetical incident at TMI. Participants included representatives from various other departments (such as Health, State Police, Military Affairs, and Environmental Resources) and other concerned agencies (such as the Red Cross). The exercise also served as a prelude to a comparable field exercise scheduled for mid-July, 1980.

Team members served as participants during the July 1980 PEMA Field Exercise. Unlike the Table Top Exercise in April, Commonwealth participants operated from their assigned emergency operations center ("EOC") locations, not from the PEMA Conference Room. Since the scenario exercised the

response of Licensee and agencies at the Department, PEMA and County level, the Dauphin County Coordinator later asked the Team to assist in the preparation of a scenario for two of his communities, Middletown and Highspire.

Assistance to Risk Counties

NUREG-0654, FEMA-Rep 1, Revision 1, was published in final form in November 1980. This document establishes the federal standards to be used as guidance by NRC licensees, state and local governments in the development of radiological emergency response plans. In February 1981, in response to the new federal guidance, PEMA published a revised Annex E "Fixed Nuclear Facility Incident" to the Commonwealth of Pennsylvania Disaster Operations Plan.

These two documents (NUREG-0654 and Annex E, the Commonwealth plan), as revised, had a significant impact on the existing five county plans in the TMI plume exposure pathway EPZ. PEMA requested that Licensee provide additional consultation services to these counties, on a relatively expedited basis, to update the county plans to meet the new federal guidance. Licensee responded by entering into an agreement with EMS for the provision of consultation services to the five risk counties during the period March 1 through April 30, 1981. As a result of these efforts, the five county plans have recently been revised to meet the new criteria.

Relationships Among Various Levels of Government

Federal, state, county and municipal governments, individually and collectively, have considerable personnel and material resources available. Few of these resources are stockpiled or reserved for emergency use only. For example, structures and transportation and communications systems have both emergency and non-emergency uses. While emergency planning and management is a joint responsibility of the federal, state, county and municipal governments, county and municipal governments -- due to their proximity to the public -- are the first to respond in an emergency, to save lives and protect property. Each level of government, starting at the municipal level, is expected to commit all resources at its disposal before the next higher level of government is called upon to provide additional resources.

In contrast to this description of emergency response, preplanning for the effective mobilization of resources must by necessity begin at a higher level of government, in this case the Commonwealth of Pennsylvania. If, for example, each of the 38 municipalities within the plume exposure pathway EPZ were to develop their own emergency plans, it is highly unlikely that a coordinated response making best use of all available resources at every level of government would result. This potential problem is avoided by initiating emergency planning at the state level.

In this regard, Annex E to the Commonwealth's Disaster Operations Plan sets forth a fully coordinated concept of operations for responding to a radiological emergency from a fixed nuclear facility. The Commonwealth's plan assigns to state and county agencies those responsibilities necessary to implement the concept of operations described in the plan. Annex E further specifies the manner in which state-level agencies will discharge those responsibilities.

With respect to those responsibilities assigned to county-level agencies, each of the five risk counties within the plume exposure pathway EPZ also has developed a plan for responding to radiological emergencies at fixed nuclear facilities. As might be expected, the concept of operations specified in the county plans is limited to those areas unique to the county-level response. The county-level concept of operations is consistent with the concept of operations specified in the Commonwealth's plan.

Given this substantial amount of preplanning already in place, there is little need for a municipal "plan" to reflect any additional planning. Instead, the municipal "plan" is more in the nature of a document explaining how the resources at hand will be brought to bear to implement the concept of operations described in the state- and county-level plans. From this perspective, the municipal "plan" is properly viewed as an adjunct to the standard operating procedures relied upon by state- and county-level response organizations.

Our efforts with respect to municipal-level planning have been directed towards documenting in a clear and concise manner the methods that will be used at the municipal level to implement the concept of operations set forth in the state and county plans. Without in any way denigrating the desirability of such municipal planning, it would be wrong to conclude that the absence of a municipal plan, or the existence of some perceived defect in such plans, means that prompt and effective emergency response will not take place. Our extensive experience in both planning and operations is to the contrary. The resources that would be brought to bear most quickly at the municipal level in the event of a radiological accident are precisely the same resources that routinely respond to a broad range of community emergencies.

Conclusion

In providing planning assistance to the communities, as well as the other activities I have described, the Team held planning assistance sessions in 68 different locations. The Team maintained continuous liaison with PEMA officials and the five risk County Emergency Management Coordinators, as well as with appropriate officials in the Pennsylvania Department of Education and numerous local officials. The result of the effort was a significant improvement in the level of emergency planning with the TMI plume exposure pathway EPZ. However, no plan is static. Plans must be dynamic and ever-changing, in

response to changes in resources and requirements. Licensee has recently retained EMS, effective May 1, 1981, to perform a plan maintenance consulting service. Under the agreement, EMS will review the plans of and offer continuous planning assistance to the 38 communities in the TMI plume exposure pathway EPZ. We will conduct periodic workshop sessions on emergency planning in cooperation with PEMA and the County Emergency Management Coordinators. Through this process, we will assure that plans are kept current, that planning is coordinated and has a sense of urgency, and we will encourage local officials to foster a high level of emergency response capability.

EUGENE F. KNOFF

Business Address: Emergency Management Services, Inc.
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Harrisburg, Pennsylvania

Education: B.A., Social Studies, Muhlenberg
College, 1965.
M.A., Government and Public Administration,
Lehigh University, 1966.

Experience: President, Emergency Management
Services, Inc., January 1981 to present.

General Partner, Kline, Knopf & Wojdak,
January 1979 to present.

Executive Assistant to Lieutenant Governor
of Pennsylvania, 1971 to 1979. Participated
in policy making and management of state
government, and in legislative affairs.
Directly coordinated the Administration's
civil disorder and disaster response
activities in several major emergencies.
Instrumental in preparation and passage of
Pennsylvania Emergency Management Services
Act, which established the Pennsylvania
Emergency Agency.

Research Director for Pennsylvania State
Senate, 1968 to 1971.

United States Air Force, 1956 to 1960.

Teaching
Experience: Taught government at Pennsylvania State
University and Northampton Community
College, 1968 to 1969.

Conducted numerous lectures and workshops
on the legislative process, politics and
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Professional
Honors: Recipient, Pennsylvania Meritorious Service
Medal, 1973, for leadership during Hurricane
Agnes disaster and recovery operations.

WILLIAM J. GALLAGHER

Business Address: Emergency Management Services, Inc.
111 State Street
Harrisburg, Pennsylvania

Education: Graduate, U.S. Army War College (doctorate level studies emphasizing strategic planning), 1956.

Graduate, U.S. Army Command and General Staff College, 1948.

U.S. Department of Defense Atomic Energy Course, 1948.

U.S. Department of Defense Civil Defense Course, 1968.

Experience: Consultant Emergency Management Services, Inc., January 1981 to present.

Consultant, Kline, Knopf & Wojdak, March 1980 to January 1981.

Deputy Adjutant General of Pennsylvania, 1972 to 1977. As Deputy Commander of Pennsylvania National Guard (Army and Air), involved in emergency planning and response operations necessitated by Hurricanes Agnes and Eloise, the Truckers Strike, and other emergencies throughout the State.

State Coordinator for Civil Defense Education, 1970 to 1972. Taught instructors to conduct 12 hr. course on personal survival in event of nuclear attack.

Staff Officer in Civil Defense Education, 1968 to 1970.

Faculty, U.S. Army War College, 1962 to 1967.

Planner with Central Treaty Organization (CENTO), attached to U.S. Embassy in Ankara, Turkey, 1959 to 1962.

Thirty-five years of experience in Army and National Guard, with planning experience at every level, including 7 years as planning officer with U.S. Army General Staff at the Pentagon. Also served as Executive Officer and Vice Chief of Staff of U.S. Army.

Awards: Legion of Merit with Oak Leaf Cluster
Bronze Star with Oak Leaf Cluster
French Croix de Guerre
Great Star of Ethiopia
Pennsylvania Distinguished Service Medal

ORAN K. HENDERSON

Business Address: Emergency Management Services, Inc.
111 State Street
Harrisburg, Pennsylvania

Education: B.S., Military Sciences, University of
Maryland, 1962.
Graduate, Armed Forces Staff College,
1959.
Graduate, Naval War College, 1963.

Experience: Executive Vice President for Operations,
Emergency Management Services, Inc.,
January 1981 to present.

Consultant, Kline, Knopf & Wojdak
Fall 1980.

Director, Pennsylvania Emergency Management
Agency, 1976 - September 1980.

35 years of active Army service, including
combat commands in World War II,
Korea and Vietnam.

Professional
Honors and
Affiliations: President-elect, National Association of
State Emergency Management Directors,
1979-80.

Member, Interorganizational Advisory
Committee on Radiological Emergency Planning
and Preparedness (which assisted the FEMA/NRC
Steering Committee in the development and
review of NUREG-0654), 1979-80.

Selected to represent the United States at
an international meeting on radiological
emergency planning in Stockholm, Sweden,
October 1980.

Lectured on TMI-2 accident at conference
of International Atomic Energy Agency in
Vienna, Austria, February 1980.

Other Awards: Combat Infantry Badge
Five Silver Stars
Five Bronze Stars (two for valor)

Four Purple Hearts
Legion of Merit with Oak Leaf Cluster
Joint Services Commendation Medal
Army Commendation Medal with Cluster
Pennsylvania Distinguished Service Medal
Vietnamese Cross of Gallantry
Vietnamese Medal of Merit

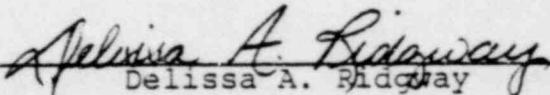
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Testimony of Eugene F. Knopf, William Gallagher and Oran Henderson Relating To Emergency Planning" were served upon those persons on the attached Service List by deposit in the United States mail, postage prepaid, this 27th day of April, 1981, except that those persons whose names are marked by a single asterisk are being served by Federal Express, and those persons whose names are marked by a double asterisk will be hand served tomorrow.



Delissa A. Ridgway

Dated: April 27, 1981

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