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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

JUDGE IVAN W. SMITH, CHAIRMAN  
JUDGE RICHARD F. COLE  
JUDGE KENNETH A. McCOLLOM

_____ )	
In the Matter of )	
Public Service Co. of New Hampshire, )	Docket No. 50-443-OL
et al. )	50-444-OL
(Seabrook Station, Units 1 & 2) )	Offsite Emergency
_____ )	Planning Issues
_____ )	

NOTICE OF FILING

The Federal Emergency Management Agency (FEMA) respectfully submits to the Licensing Board and the parties two reports updating materials included in FEMA's December 1988 consolidated finding on the Seabrook Nuclear Power Station. The first report is FEMA's February 1990 Review and Evaluation of the State of New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook Station. This report updates the December 1988 Review and Evaluation of the NHRERP. The second report is FEMA's January 1990 Report on the Status of Corrective Actions, First Exercise and Drill Cycle, 1988 to 1994, of the States of Maine and New Hampshire and New Hampshire Yankee's Offsite Response Organization for the Seabrook Station. The second report updates and retitles the December 1988 Status of Corrective Actions for the 1988 FEMA Graded Exercise.

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Respectfully submitted,

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(Seabrook Station, Units 1 & 2) )  
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Docket No. 50-443-OL  
50-444-OL  
Offsite Emergency  
Planning Issues

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Notice of Filing and attachments have been served upon the following persons by U.S. mail, first class, on February 9, 1990.

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Dated: February 9, 1990





# Federal Emergency Management Agency

Washington, D.C. 20472

FEB 9 1990

Mr. James M. Taylor  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Taylor:

This is to transmit the enclosed two reports updating materials included in the Federal Emergency Management Agency's (FEMA) December 1988 consolidated finding on the Seabrook Nuclear Power Station. The first report is the February 1990 Review and Evaluation of the State of New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook Station. This report updates the December 1988 Review and Evaluation of the NHRERP. The second report is the January 1990 Report on the Status of Corrective Actions, First Exercise and Drill Cycle, 1988 to 1994, of the States of Maine and New Hampshire and New Hampshire Yankee's Offsite Response Organization for the Seabrook Station. The second report updates and retitles the December 1988 Status of Corrective Actions for the 1988 FEMA Graded Exercise.

The February 1990 Review and Evaluation of the NHRERP is based on revisions of that plan recently distributed by the State of New Hampshire. The evaluation continues to support FEMA's finding that New Hampshire's plans and preparedness are adequate to protect the health and safety of the public living in the New Hampshire portion of the Seabrook Emergency Planning Zone, by providing reasonable assurance that appropriate protective measures can be taken offsite in the event of a radiological emergency and are capable of being implemented.

If you have any questions, please feel free to contact me at 646-3692. We will be forwarding additional copies of these reports under separate cover.

Sincerely,

Grant C. Peterson  
Associate Director  
State and Local Programs and Support

Enclosures  
As Stated

Federal Emergency Management Agency  
Region I

**REPORT ON THE STATUS OF CORRECTIVE ACTIONS  
FIRST EXERCISE AND DRILL CYCLE  
1988 TO 1994  
OF THE STATES OF MAINE AND NEW HAMPSHIRE  
AND NEW HAMPSHIRE YANKEE'S OFFSITE RESPONSE ORGANIZATION  
FOR THE SEABROOK STATION**



January 1990

Federal Emergency Management Agency  
Region I

**REPORT ON THE STATUS OF CORRECTIVE ACTIONS  
FIRST EXERCISE AND DRILL CYCLE  
1988 TO 1994  
OF THE STATES OF MAINE AND NEW HAMPSHIRE  
AND NEW HAMPSHIRE YANKEE'S OFFSITE RESPONSE ORGANIZATION  
FOR THE SEABROOK STATION**



January 1990



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## EXECUTIVE SUMMARY

### BACKGROUND

On December 7, 1979, the President directed the Federal Emergency Management Agency (FEMA) to assume lead responsibility for all offsite nuclear planning and response.

FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- a. Taking the lead in offsite emergency planning and in the review and evaluation of radiological emergency response plans developed by State and local governments;
- b. Determining whether such plans can be implemented on the basis of observation and evaluation of exercises of the plans conducted by State and local governments;
- c. Responding to requests by the NRC pursuant to the Memorandum of Understanding (MOU) between NRC and FEMA relating to Radiological Emergency Planning and Preparedness, 50 Fed. Reg. 15485 (April 18, 1985);
- d. Coordinating the activities of Federal Agencies with responsibilities in the radiological emergency planning process:
  - U.S. Department of Commerce (DOC)
  - U.S. Nuclear Regulatory Commission (NRC)
  - U.S. Environmental Protection Agency (EPA)
  - U.S. Department of Energy (DOE)
  - U.S. Department of Health and Human Services (HHS)
  - U.S. Department of Transportation (DOT)
  - U.S. Department of Agriculture (USDA)

- U.S. Department of the Interior (DOI).

Representatives of these agencies serve on the Regional Assistance Committee (RAC), which is chaired by FEMA.

## INTRODUCTION

FEMA has the responsibility to determine whether offsite plans for emergencies at nuclear power plants can be implemented. Federal regulations require offsite response organizations to demonstrate that they can implement their plans over a series of exercises and drills conducted in a six year cycle.

The criteria utilized in the FEMA evaluation process are contained in NUREG-0654/FEMA-REP-1, Rev. 1 (November 1980), NUREG-0654/FEMA-REP-1, Rev. 1, Supp. 1 (September 1988), the Exercise Evaluation Methodology (EEM) specified in FEMA memorandum dated June 20, 1988, and those expected actions called for by the plans and procedures of the participants. FEMA evaluates plans against a set of 37 objectives. The basis for the 37 objectives was taken from standards contained in FEMA's 44 CFR 350.5 and the FEMA/NRC documents, NUREG-0654/FEMA-REP-1, Rev. 1 and NUREG-0654/FEMA-REP-1, Rev. 1, Supp. 1. The 37 offsite objective statements were taken from FEMA Guidance Memorandum (GM) EX-3 (February 26, 1988) and its March 7, 1988 amendment, Managing Pre-Exercise Activities and Post Exercise Meetings.

For the purpose of exercise and drill assessment and evaluation, FEMA uses the following methodology to classify exercise inadequacies. FEMA classifies exercise inadequacies as deficiencies or areas requiring corrective actions. Deficiencies (DEF) are demonstrated and observed inadequacies that would cause a finding that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public living in the vicinity of a nuclear power facility in the event of radiological emergency. Because of the potential impact of deficiencies on emergency preparedness, they are required to



be promptly corrected through appropriate remedial actions, including remedial exercises, drills, or other actions. Areas Requiring Corrective Action (ARCA) are demonstrated and observed inadequacies of performance, and although their correction is required, they are not considered, by themselves, to adversely impact public health and safety. In addition to these exercise inadequacies, FEMA identifies Areas Recommended for Improvement (ARFI), which are areas/issues observed during an exercise that are not considered to adversely impact public health and safety. While not required, correction or improvement of these areas/issues would enhance an organization's level of emergency preparedness.

## REPORT

FEMA Headquarters has established policy that requires the Regions to develop and maintain a data base on exercise and drill evaluations. This report represents the Exercise Issue Database for the Seabrook site for the first six year cycle of drills and exercises.

When exercise issues are identified, FEMA requests corrective actions to address and resolve the issues. The offsite response organizations present action plans, milestone dates, and commitments to resolve the basis for the issues.

This document is a status report on the status of corrective actions. This document is updated periodically to reflect changes in status to identified issues and changes to database (additional drills and exercises). See Table 1 for the drills and exercises performed in the six year cycle and reflected in this report.

This report contains three sections, one for each of the three primary emergency response organizations: the States of Maine and New Hampshire and New Hampshire Yankee's Offsite Response Organization. Within each section, as appropriate, there are subsections that reflect the status of issues identified in individual drills and exercises.

The subsections are presented in the following format:

- Subsection header: offsite response organization and the appropriate drill or exercise.
- Objective number: the number of the applicable objective.
- Category of exercise inadequacy: DEF, ARCA or plan issue. FEMA notes that we do not track resolution of ARFIs.
- Exercise inadequacy: a narrative description of the issue. FEMA notes that the complete text can be found in the appropriate exercise or drill report.
- Recommended Corrective Action: a statement expressing the item recommended for implementation or corrective action. FEMA notes that this text represents the actions taken by the offsite response organization.
- Commitment Date: date established by the offsite response organization for corrective action to be complete.
- Realization Date: date that the corrective actions were implemented. FEMA notes that this data field contains FEMA verification when appropriate.

**TABLE 1 Seabrook Exercise Chronology First Six Year Cycle 1988-1994**

**A. BIENNIAL EXERCISES**

<u>Exercise Date</u>	<u>Participants</u>
• June 28-29, 1988	Maine, New Hampshire, and New Hampshire Yankee Offsite Response Organization

**B. MEDICAL DRILLS**

• June 28, 29, 1988	New Hampshire
• June 29, 1988	New Hampshire Yankee Offsite Response Organization
• October 3, 1989	New Hampshire
• October 4, 1989	New Hampshire Yankee Offsite Response Organization



## 1. STATE OF MAINE - 1988 EXERCISE AND DRILL

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
4	ARCA	The Media Operations Center did not have ample telephone capability for the working press. (F)	State of Maine is upgrading its Media Operations Center. Additional telephone capability will be provided.	6/89	6/89, 25 pairs of telephone lines installed in Media Operations Center, 8/7/89 letter. Verified by R. Donovan 8/89 visit.
5	ARCA	Some of the displays and status boards in the Media Briefing Room were not mounted or arranged for adequate use during briefs for the media. (G.3.a)	State of Maine is upgrading its Media Operations center. Adequate display and status boards will be provided.	6/89	6/89, modification made to Media Center for mounting displays, 6/26/89 letter. Verified by R. Donovan 8/89 visit.
6	ARCA	Non-Troop A personnel were not provided instructions on the use of dosimetry which are included as App. B of the Traffic Management Manual (TMM). (K.3.a-b)	• TMM will be distributed to <u>all</u> ACP & TCP responding organizations.	1/89 (TMM)	12/88, Plan distributed, 12/29/88 letter. TMMs have been distributed to all responding organizations.

## 1. STATE OF MAINE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
6 (Cont'd)			<ul style="list-style-type: none"> <li>An instruction card for EW exposure control will be developed.</li> <li>Training will be accomplished during the next annual cycle.</li> </ul>	6/89 (Instruction card)	6/89, Instruction card developed and distributed, 10/19/89 letter.
8	ARCA	The air sampling pump was last calibrated in September 1986. (H.10)	Pump was calibrated 8/88. Plan specifies maintenance program which is viewed to be adequate. This piece of equipment inadvertently missed its calibration cycle.	8/88	8/88, Pump was calibrated.
20	ARCA	Some personnel at ACP's were not fully knowledgeable about the five groups of individuals who were to be allowed access past the ACP. (J.10.j)	<ul style="list-style-type: none"> <li>The TMM will be distributed to all ACP &amp; TCP responding organizations.</li> </ul>	1/89 (TMM)	12/88, Plan distributed. 12/29/88 letter. TMMs have been distributed to all responding organizations.



## 1. STATE OF MAINE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
20 (Cont'd)			<ul style="list-style-type: none"> <li>• Training will be accomplished during the next annual training cycle.</li> </ul>	1989 (Training)	Training conducted in Sept. & Oct., 10/19/89 letter.
27	ARCA	The kits did not contain equipment and supplies to decontaminate sample collection tools. (J.11)	<ul style="list-style-type: none"> <li>• The Procedures were revised on 8/1/88.</li> <li>• Equipment will be provided by 1/1/89.</li> </ul>	8/88 (Procedures)  1/89 (Equipment)	8/88, Plan revised.  12/88, equipment provided, 12/29/88 letter. Decontamination supplies have been added to sample collection kits.
			<ul style="list-style-type: none"> <li>• Training will be completed during next annual training cycle.</li> </ul>	1989 (Training)	Training conducted in July, 10/19/89 letter.
30	ARCA	The preventive PA to shelter milk cows and place them on stored feed did not include goats. (J.11)	<ul style="list-style-type: none"> <li>• Plan was revised to include all lactating animals in PAs.</li> <li>• Staff will be trained on Preventive/Emergency Protective Actions.</li> </ul>	8/88 (Plan)  1989 (Training)	8/88, Plan revised.  Training conducted in July, 10/19/89 letter.



## 1. STATE OF MAINE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
Maine Other Issue #1c		The Plan does not contain adequate trigger levels for defining contamination.	<ul style="list-style-type: none"> <li>• Procedure 2.06 was revised in the 8/1/88 Revision.</li> <li>• Training will be conducted during next annual training cycle.</li> </ul>	8/88 (Plans)  1989 (Training)	8/88, Plan revised.  State training conducted in July, 10/19/89 letter.
Maine Other Issue #2 <sup>c</sup>		Procedures did not have forms for recording the results of the survey of individuals.	<ul style="list-style-type: none"> <li>• Appropriate forms have been generated and included in the 8/1/88 Revision.</li> <li>• Training will be accomplished during next annual training cycle.</li> </ul>	8/1/88 (Plans)  1989 (Training)	8/88, Plan revised.  State training conducted in July, 10/19/89 letter.

## 1. STATE OF MAINE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
Maine Other Issue #3 <sup>c</sup>		Written procedures are not available that describe: 1) Setting up the sample receipt area; 2) Receipt, monitoring, logging and transfer into the laboratory, and 3) Gamma spectra analysis.	Updated Lab Procedure were completed by 10/1/88.	10/1/88 (Plans)	10/88, Lab procedures issued.

<sup>a</sup>Exercise Inadequacy:

DEF Demonstrated and observed inadequacies that would cause a finding that preparedness was not adequate to provide reasonable assurance that the public's health and safety are protected. Prompt remedial action required.

ARCA Areas observed that require corrective actions. Correction required before next biennial exercise.

<sup>b</sup>Reference NUREG-0654/FEMA-REP-1, Rev. 1 (Planning Standards and Elements).

<sup>c</sup>Other Issue: Plan issues that were identified. The planning issues represent functional areas that were not part of the scope of the exercise objective and extent of play.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
2	ARCA	The NH PIO at Media Center was observed on a number of occasions having trouble reaching his counterpart at the State EOC. (A.l.d)	<ul style="list-style-type: none"> <li>The 6/88 Revision to the NHRERP contains an additional staff member for Media Liaison duties at NH State EOC. This person will spend more time in contact with the PIO.</li> <li>The importance of constant PIO contact will be reinforced with training.</li> </ul>	8/88 (Plan)	8/88, Plan revised.
4	ARCA	Some of the radios being used by staff in nonparticipating communities experienced poor reception quality due to weak radio batteries. (F)	An instruction sheet for battery rotation, and quarterly inspection has been developed. Additional batteries have been provided.	9/88	9/88, Batteries provided, instruction sheet provided. 2/89, quarterly inspection started.
4	ARCA	Notification and communication with the Portsmouth Circle Business Center Staging Area was to be made by fax. The fax machine did not work. (F)	The fax machine was initially reported to be broken; however, further evaluation indicates that this was due to operator's error, not to the machine itself. Training will be provided to ensure operators know how to use equipment.	1989 (Training)	Training module revised in July and Staging Area staff trained in August, 10/19/89 letter.



## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
5	ARCA	Media Center - There were no maps available for news briefings that adequately depicted evacuation routes, plume EPZ populations, reception centers locations, congregate care center locations. There was no status board present in the staff working area. (G.3.a)	All Media Center displays will be upgraded to incorporate these comments. Maps of the plume Exposure & Ingestion Exposure Pathway EPZ will be compiled & placed in the Media Center. The maps will include major evacuation routes, access & traffic control points, population data & the locations of the emergency facilities. A status board will be made available in the working area.	6/89	6/89, Media Center displays upgraded and are in place, 10/19/89 letter.
6	ARCA	Most bus drivers, ambulance drivers, town personnel, and a few local police did not monitor exposure via the use of dosimetry equipment and exposure control procedures. (K.3.a and b)	<ul style="list-style-type: none"> <li>• Additional training on dosimetry equipment and exposure control use will be provided to all emergency workers.</li> <li>• Instruction cards will be provided to all field workers. These will be stored and distributed with the dosimetry.</li> </ul>	1989 (Training)	Training module 2 & 19 were revised. Training was completed as part of annual training cycle.
				6/89 (Instruction card)	6/89, Instruction card developed and distributed, 10/19/89 letter.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
13	ARCA	Some News Releases contained "need to know" information and should have more properly been issued as EBS messages or revised EBS messages (instructions). Some EBS messages lacked important information. (E.5 and G.4.b)	<ul style="list-style-type: none"> <li>◦ Sets of draft news releases and EBS messages will be expanded; Department of Education Procedure will also be expanded to include steps for providing school related EBS message input.</li> <li>◦ Preparers will be trained on developing appropriate EBS message and news releases.</li> </ul>	1989 (Plan)	12/89, Plan revised.
				1989 (Training)	Training module 21 was revised. PIO training was conducted in August, 10/19/89 letter.
14	ARCA	New Hampshire spokesmen, while generally proficient, demonstrated an apparent lack of knowledge regarding emergency planning zone issues. (G.4.a)	<ul style="list-style-type: none"> <li>◦ The 6/88 Revision to the NHRERP adds a technical assistant to the Media Center Representative.</li> <li>◦ Both personnel will be trained thoroughly in the RERP.</li> </ul>	6/88 (Plan)	8/88, Plan revised.
				1989 (Training)	8/89, Training was completed as part of annual training cycle.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
18	ARCA	Some drivers had difficulty in reading or following the maps. Maps lacked detail and accuracy. (J.10.d)	<ul style="list-style-type: none"> <li>• Maps will be reviewed to make them clearer &amp; concise. Bus route strip maps will be reviewed and revised to ensure maps are clearer, concise and ensure routes are correct. Maps will include recognizable landmarks, key points &amp; key intersections as possible.</li> <li>• Additional training for drivers will be provided in next annual cycle.</li> </ul>	6/89, (Maps)	6/89, maps revised and issued.
				1989 (Training)	Module 19 was revised in 7/89. Training was completed as part of annual training cycle.
19	ARCA	In Brentwood, after the order to shelter was received, the selectman in charge called the Swasey School to tell them to let the children take their normal bus routes home. In Portsmouth, the schools were told to effect early dismissal and to hold only latch key children by the Portsmouth EOC. (J.10.g)	Additional training will be provided to staff members on protective actions.	1989	Training module 4C (EOC operations) was revised. Brentwood was trained in January, Portsmouth was trained in June 10/19/89 letter.



## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
19	ARCA	In several cases, the maps had wrong instructions or had wrong addresses which created problems for those drivers. (J.10.g)	<ul style="list-style-type: none"> <li>Bus Route strip maps will be reviewed and revised to ensure instructions/addresses are correct and concise.</li> <li>Drivers will be provided training on following route instructions.</li> </ul>	6/89 (Maps)	6/89, maps revised and issued.
				1989 (Training)	Training module 19 was revised to include following route instruction. Training was completed as part of the annual training cycle.
21	ARCA	Monitors did not consistently use headsets while performing monitoring. (J.12)	Each CDV-700 (or equivalent) issued by the State for radiological monitoring purposes is accompanied by a headset. The State has established a quarterly maintenance program in accordance with Vol. 1, Sec. 2.4.5. This program ensures that all radiological equipment is in a constant state of readiness. Training for monitors will address the need for	1989 (Training)	Training was completed as part of the annual training cycle.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
21 (Cont'd)			monitoring personnel to control background noise and include practical sessions which stress monitoring in a noisy environment.		
21	ARCA	The Radiological Screening Program at the State EOC-DPHS level was not well developed relative to who has specific duties and responsibilities for implementation of the program. (J.12)	<ul style="list-style-type: none"> <li>◦ The procedure will be reviewed and revised for 1989 update. Duties and responsibilities of specific DPHS personnel will be more explicitly described.</li> <li>◦ Training of these personnel will occur during next annual cycle.</li> </ul>	1989 (Plan)	12/89, Plan revised
23	ARCA	The patient was not covered to confine contamination when transported (L.4)	The existing procedure provides for covering. Training on this procedure will be provided.	1989 (Training)	Training was completed as part of the annual training cycle. See objective 23, Section 2.2.

## 2.1 STATE OF NEW HAMPSHIRE - 1989 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
23	ARCA	Ambulance attendants need to be provided with a list of MS hospitals and maps to where they may transport contaminated patients or a MS hospital designated at the time of the assignment. The procedure needs to be changed to cover transport of a patient with life-threatening injuries to specify transport to the nearest hospital. (L.4)	<ul style="list-style-type: none"> <li>Map to identify all hospitals and those which are MS-1 will be developed.</li> <li>Ambulance procedure will be reviewed and revised, as necessary, for the 1989 update.</li> </ul>	<p>6/89 (Maps)</p> <p>1989 (Plans)</p>	<p>Map developed and issued, 10/89 letter.</p> <p>12/89, Plan revised.</p>
24	ARCA	Medical & Nursing staff members & personnel performing radiation monitoring did not fully understand the biological effects of radiation, the significance of "counts	<ul style="list-style-type: none"> <li>Module 23, Management of Contaminated Injured Patients, will be revised to emphasize radiation terminology &amp; biological effects.</li> </ul>	1989	Module 23 was revised in August, 10/19/89 letter. Verified in 10/89 drill.



## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
24 (Cont'd)		per minute" (contamination) and "Millirem per hour" (dose rate) and the monitors did not fully understand how to make and interpret contamination and dose rate measurements (L.1)	<ul style="list-style-type: none"> <li>• Training will be provided to MS-1 Medical &amp; Nursing Staff.</li> </ul>		Training was conducted in August, 10/19/89 letter. Verified in 10/89 drill.
27	ARCA	The teams were unfamiliar with maps and had difficulty reaching their original locations. (J.11)	Additional training will be provided. Several of the monitoring personnel were participating in their first graded exercise & map reading difficulties were due largely to inexperience. This problem will be remedied by providing additional training.	1989	Training was conducted in May, 10/19/89 letter.
		Team #1 was unfamiliar with procedures for sample collection and with survey techniques with the assigned instruments. (J.11)	Sample teams will be provided additional training on these procedures and the use of the instruments.	1989	Training was conducted in May, 10/19/89 letter.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
34	ARCA	Shift change for key staff positions was not demonstrated for Seabrook and Kingston. Partial shift change was demonstrated for Portsmouth, Newfields, Brentwood, Stratham, E. Kingston, Newton, and Newcastle. (A.4)	Appropriate local and host EOCs will demonstrate full shift change at a drill, or during the next Graded Exercise.	Next Graded Exercise	
N.H. Other Issue #1 <sup>c</sup>		Adequate arrangements did not exist for 24-hour continuous operation of Staging Areas and Reception Centers.	<ul style="list-style-type: none"> <li>• Additional steps were added to both procedures in the 6/88 Revision to the NHRERP to ensure continued operations are maintained.</li> <li>• Training will be accomplished in next cycle.</li> </ul>	6/88 (Plans)	8/88, Plan revised.
				1989 (Training)	Training for Reception Center was conducted in November (1988) and training for Staging Area was conducted in August, 10/19/89 letter.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
N.H. 1986 Exercise Deficiency #24 <sup>d</sup>	ARCA	One bus route strip map had a confusing area which will require map to be modified.	Bus Route strip maps will be upgraded to support resolution of this comment.	6/30/89 (Maps)	6/89, maps revised and issued.
N.H. 1986 Exercise Deficiency #33 <sup>d</sup>	ARCA	The spokesman for NH OEM at critical times did not appear fully knowledgeable on important aspects of the emergency plan.	Additional training will be provided during the next annual cycle to ensure the spokesman for NH OEM is thoroughly knowledgeable on the NHRERP.	1989 (Training)	PIO Training was completed in August, 10/19/89 letter.
N.H. 1986 Exercise Deficiency #38 <sup>d</sup>	ARCA	There was an inconsistency present in the plans regarding monitoring speed (frisking). App. F5 of Vol. 4A indicates rate of one inch per second, p. F7-14 indicates a monitoring speed of about 1/2 in. per second. Page B6-14 of the host community plans (including Manchester) also states 1/2 in. per second.	This inconsistency has been removed in the 6/88 Revision to the NHRERP.	6/88 (Plan)	8/88, Plan revised.



## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
N.H. 1986 Exercise Deficiency #45 <sup>d</sup>	ARCA	Plan should be revised to show EOC downstairs.	Plan will be reviewed and revised for the 1989 update. The revised EOC concept will be shown.	1989 (Plan)	12/89, Plan revised.
N.H. 1986 Exercise Deficiency #49 <sup>d</sup>	ARCA	The 1986 Exercise Issue #49 refers to an operational need for coordination between Brentwood and the Rockingham County complex. Although the State Transportation Staging Area Procedures have been developed with consideration for traffic volume, the procedures themselves do not resolve the issue.	Coordination between the State Staging Area and the Brentwood EOC will be addressed during annual training for the Rockingham County Staging Area and Brentwood EOC Staff.	1989 (Training)	Training was conducted for Staging Area staff in August and for Brentwood EOC staff in January, 10/89 letter.

## 2.1 STATE OF NEW HAMPSHIRE - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
N.H. 1986 Exercise Deficiency #87 <sup>d</sup>	NA	Copies of the bus routing maps, which reportedly have been updated to show the Packer Meadow Home location are not present in the updated plan. These maps need to be reviewed to confirm that the facility is included in the bus routing scheme.	The State notes that the Packer Meadow Home is an elderly housing project, not an identified special facility. Its residents are treated as part of the general public and therefore the facility does not appear on a specific map. However, bus routes for the general public without transportation, including the Packer Meadow Home, have designated bus routes. Individuals requiring special assistance, as in the general public, will be identified and included on the special needs list.	N/A	N/A

<sup>a</sup>Exercise Inadequacy:

DEF Demonstrated and observed inadequacies that would cause a finding that preparedness was not adequate to provide reasonable assurance that the public's health and safety are protected. Prompt remedial action required.

ARCA Areas observed that require corrective actions. Correction required before next biennial exercise.

<sup>b</sup>Reference NUREG-0654/FEMA-REP-1, Rev. 1 (Planning Standards and Elements).

<sup>c</sup>Other Issue: Plan issues that were identified. The planning issues represent functional areas that were not part of the scope of the exercise objectives and extent of play.

<sup>d</sup>Verification of Corrective Actions: Exercise inadequacies identified in previous exercises/drills to which the organizations have agreed to implement corrective actions. These listed items were rated incomplete in the FEMA Seabrook Exercise Report (9/1/88). FEMA notes that these functional areas were tested in the exercise.

## 2.2 STATE OF NEW HAMPSHIRE - 1989 DRILLS

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
23	ARCA	Ambulance attendant removed shoe covers before entering vehicle	<ul style="list-style-type: none"> <li>◦ Revise training module 023A</li> <li>◦ Revise ambulance procedures</li> <li>◦ Train staff</li> </ul>	8/90	
23 and 1988 ARCA for Obj. 23 <sup>c</sup>	ARCA	Ambulance attendant did not package patient in accordance with procedures.	<ul style="list-style-type: none"> <li>◦ Train staff</li> </ul>	8/90	
24	ARCA	Support staff did not demonstrate proper monitoring techniques.	<ul style="list-style-type: none"> <li>◦ Train staff</li> </ul>	8/90	

<sup>a</sup>Exercise Inadequacy:

DEF Demonstrated and observed inadequacies that would cause a finding that preparedness was not adequate to provide reasonable assurance that the public's health and safety are protected. Prompt remedial action required.

ARCA Areas observed that require corrective actions. Correction required before next biennial exercise.

<sup>b</sup>Reference NUREG-0654/FEMA-REP-1, Rev. 1 (Planning Standards and Elements).

<sup>c</sup>Verification of Corrective Actions: Exercise inadequacies identified in previous exercises/drills to which the organizations have agreed to implement corrective actions. These listed items were rated incomplete in the FEMA Seabrook Drill Report (1/90).



## 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
3	ARCA	There was a delay at the Staging Area in responding to an impediment to evacuation traffic. (A.1.d)	<ul style="list-style-type: none"> <li>To ensure that the Staging Area Leader maintains command &amp; control, the flexibility to assign an assistant has been added to IP 3.2 in Amendment 6. As necessary, duties may be delegated to ensure immediate response to situations which may arise in an evacuation; i.e., traffic impediment.</li> <li>Training will be provided in annual cycle.</li> </ul>	8/88, (Plan)	8/88, Plan revised.
				1989 (Training)	6/89, Training modules revised, 6/21/89 letter. Training was completed as part of the annual Training cycle.
4	ARCA	Some directives to field workers were not received in the field. (F)	<ul style="list-style-type: none"> <li>Amendment 6 of IP 2.8 directs the Bus Company Liaison, Evacuation Support &amp; Special Vehicle Dispatchers to repeat the directives to field workers. Heavy radio traffic is to be expected during emergencies.</li> </ul>	8/88 (Plan)	8/88 Plan revised.

### 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1989 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
4 (Cont')			<ul style="list-style-type: none"> <li>• EMS radio will be fixed.</li> <li>• The necessary training will be provided in next training cycle.</li> </ul>	6/89 (Radio)	6/89, EMS Radio fixed; a backup radio has been installed, 6/14/89 letter.
5	ARCA	Media Center - No maps with detailed evacuation routes, relocation center locations, or population by planning areas, were used in briefings or displayed at the Media Center. Meteorological conditions were not consistently displayed and maintained. (G.3.a)	<ul style="list-style-type: none"> <li>• All Media Center displays will be upgraded to support resolution of this comment.</li> <li>• Training on the use of displays for the staff will be provided during the next training cycle.</li> </ul>	6/89 (Displays)	6/89, Media Center displays have been upgraded and are in place, 10/19/89 letter.
			<ul style="list-style-type: none"> <li>• Training on the use of displays for the staff will be provided during the next training cycle.</li> </ul>	1989 (Training)	Training (required reading) was issued in August, 10/19/89 letter.

## 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
6	ARCA	The reading of dosimeters at 15 minute intervals was not accomplished in a minority of cases in spite of the 15 min. radio tone to promote dosimeter reading. This was a more frequent problem for Bus Drivers. (K.3.a and b)	Appropriate Training will be provided to bus drivers and route guides concerning reading of dosimetry and recording exposure.	1989 (Training)	4/89, Training module revised, 6/21/89 letter. Training was conducted as part of the annual Training cycle.
13	ARCA	One of the EBS messages was not clear and NHY ORO news release #15 incorrectly stated that an overturned lumber truck was blocking traffic on I-95. (E.5, G.4.b)	Training will be provided to staff to review message and news release content for consistency and accuracy.	1989 (Training)	8/89, Training was conducted as part of the annual training cycle.
13	ARCA	EBS messages and press releases were sometimes withheld from distribution to the media relations and rumor control staff at the JTIC pending receipt of approved copy as news release from the Media Center. (E.5, G.4.b)	<ul style="list-style-type: none"> <li>• Amendment 6 of IP 2.12 provides a parallel distribution process for messages &amp; press releases to the Media Center &amp; JTIC, once approved.</li> <li>• Training will be provided in next cycle.</li> </ul>	8/88 (Plan)	8/88, Plan revised.
				1989 (Training)	9/89, Training was conducted as part of the annual training cycle.



## 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
13	ARCA	At the Media Center and at the JTIC, it was not always easy to tell which releases were EBS messages and which weren't. (E.5)	Staff will be trained to use correct letterhead for EBS messages.	1989	9/89, Training was conducted as part of the annual training cycle.
16	ARCA	Some briefings by dosimetry record keepers to Emergency Workers did not include possible side effects from ingesting KI, or what to do if side effects occur. Information materials provided to the home-bound individuals did not include this information. (K.3.a and b)	<ul style="list-style-type: none"> <li>• KI supplies are accompanied with an appropriate information sheet which will be distributed with the tablets (when procured).</li> <li>• Training will be provided to dosimetry record keepers.</li> </ul>	<p>post 5% power (Information Sheet)</p> <p>1989 (Training)</p>	<p>9/89, KI supplies have been purchased and are in place, 10/19/89 letter.</p> <p>9/89, Training was conducted as part of the annual training cycle.</p>
16	ARCA	Some route guides assigned to school evacuation did not tell their bus drivers (2 of 4) that the use of KI had been recommended nor did they tell the bus drivers that they had simulated taking KI. (K.3.a and b)	Training for Route Guides will be provided concerning exposure control/KI administration.	1989	9/89, Training was conducted, as part of the annual training cycle.

### 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
18	ARCA	Some Route Guides encountered difficulty in reading their maps. The main problem seems to be a lack of detail on the maps. (J.10.d)	<ul style="list-style-type: none"> <li>• Maps will be upgraded as necessary to ensure they are clean, concise &amp; accurate.</li> <li>• Training will be provided in the next annual cycle.</li> </ul>	6/89 (Maps)	6/89, Maps revised and issued, 6/21/89 letter.
19	ARCA	Some of the maps contained incomplete instructions or detail for locating day care centers and nurseries. (J.10.g)	Maps will be upgraded, as necessary, to ensure they are clean, concise and accurate.	6/89	6/89, Maps revised and issued, 6/21/89 letter.
19	ARCA	Some Route Guides did not insist that the bus drivers follow the designated routes. Other route guides gave directions to bus drivers to deviate from designated routes. (J.10.g)	<ul style="list-style-type: none"> <li>• IP 2.10, Attachments 3 and 4 will be revised to include specific instructions to follow prescribed routes.</li> <li>• Route Guides and bus drivers will be provided additional training.</li> </ul>	1989 (Plan)	12/89, Plan revised.
				1989 (Training)	Training was conducted as part of the annual training cycle.

## 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DEBILIS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
21	ARCA	Some maps for directing evacuees from Reception Centers to Congregate Care Centers had inadequate instructions, inconsistencies, etc. (J.12)	Maps will be upgraded, as necessary, to ensure they are clear, concise and accurate.	6/89	6/89, Maps revised and issued, 6/21/89 letter.
22	ARCA	The data base for Congregate Care Centers (CCCs) in the current procedure did not indicate which CCCs cannot accommodate handicapped persons who evacuate by themselves or with families or friends. (J.10.g)	<ul style="list-style-type: none"> <li>• Amendment 6 of Appendix M incorporated the indication of which CCC could not accommodate the handicapped.</li> <li>• Training of personnel will occur during the next annual cycle.</li> </ul>	8/88 (Plan)	8/88, Plan revised.
23	ARCA	Ambulance attendants need additional hands-on training on the procedures for contamination control. (L.4)	Training on procedures for contamination control will be provided to ambulance attendants.	1989	7/89, Training module was revised, 10/19/89 letter. Training was conducted as part of the annual training cycle.



## 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
23	ARCA	Ambulance attendants need to be provided with maps showing locations of MS-1 hospitals to which they may transport patients. The procedure should be revised to cover transport of a patient with life-threatening injuries to the nearest hospital or nearest MS-1 Hospital. (L.4)	<ul style="list-style-type: none"> <li>• Maps to identify all hospitals and those which are MS-1 will be developed.</li> <li>• Procedures will be reviewed and revised, as necessary, for the 1989 update.</li> </ul>	6/89 (Maps)	6/89, maps revised and issued, 6/21/89 letter.
24	ARCA	Medical and Nursing Staff members do not fully understand the biological effects of radiation and the significance of "counts per minute." (L.1)	Additional training will be provided.	1989	7/89, Training was completed, 10/19/89 letter.

### 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
ORO Other Issue #1 <sup>c</sup>		According to the plan one Special Population Liaison is assigned to each community. This staff level could result in excessive time required to notify special populations of the status of the emergency situation and to coordinate their transportation needs.	<ul style="list-style-type: none"> <li>The procedures have been revised in Amendment 6 to assign the Special Population Liaisons permanently to the Staging Area and to allow the flexibility to assist each other in making notifications.</li> </ul>	8/1/88 (Plans)	8/88, Plan revised.
			<ul style="list-style-type: none"> <li>Training will be provided in the next annual cycle.</li> </ul>	1989 (Training)	9/89, Training was completed as part of the annual training cycle.
ORO Other Issue #2 <sup>c</sup>		According to the plan, one School Liaison is assigned to each community. This staffing level could result in excessive time required to notify schools and day care centers of the status of the emergency situation and to coordinate their transportation needs.	<ul style="list-style-type: none"> <li>The procedures have been revised in Amendment 6 to assign the School Liaisons permanently to the Staging Area and to allow flexibility to assist each other in making notifications.</li> </ul>	8/1/88 (Plans)	8/88, Plan revised.
			<ul style="list-style-type: none"> <li>Training will be provided in the next annual cycle.</li> </ul>	1989 (Training)	9/89, Training was completed as part of the annual training cycle.

### 3.1 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION 1988 EXERCISE AND DRILLS (Cont'd)

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
ORO Other Issue #3 <sup>c</sup>		Media Center - There were some excessively long periods during which no media questions were answered i.e., the lack of update briefings by the Media Relations Floor Liaison in between formal briefings.	A NHY Onsite Response Representative coordinates the timing of press briefings. This procedure will be reviewed and training will be provided in the next annual cycle, to address informal briefings.	1989 (Training)	Training (required reading) was issued, 10/19/89 letter.

<sup>a</sup>Exercise Inadequacy:

DEF Demonstrated and observed inadequacies that would cause a finding that preparedness was not adequate to provide reasonable assurance that the public's health and safety are protected. Prompt remedial action required.

ARCA Areas observed that require corrective actions. Correction required before next biennial exercise.

<sup>b</sup>Reference NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 1 (Planning Standards and Elements).

<sup>c</sup>Other Issue: Plan issues that were identified. The planning issues represent functional areas that were not part of the scope of the exercise objectives and extent of play.



### 3.2 NEW HAMPSHIRE YANKEE OFFSITE RESPONSE ORGANIZATION - 1989 DRILLS

Objective No.	Category of Exercise Inadequacy <sup>a</sup>	Exercise Inadequacy <sup>b</sup>	Recommended Corrective Actions	Commitment Date	Realization Date
23/24	None	No exercise inadequacies were identified.	Note: All corrective actions identified for objectives 23 and 24 in Section 3.1 were verified to be corrected in these drills.		

<sup>a</sup>Exercise Inadequacy:

DEF Demonstrated and observed inadequacies that would cause a finding that preparedness was not adequate to provide reasonable assurance that the public's health and safety are protected. Prompt remedial action required.

ARCA Areas observed that require corrective actions. Correction required before next biennial exercise.

<sup>b</sup>Reference NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 1 (Planning Standards and Elements).

FEBRUARY 1990

REVIEW AND EVALUATION OF THE STATE OF NEW HAMPSHIRE  
RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR  
SEABROOK STATION



Federal Emergency Management Agency  
February 1990

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REVIEW AND EVALUATION OF THE STATE OF NEW HAMPSHIRE  
RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR  
SEABROOK STATION



Federal Emergency Management Agency  
February 1990



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## ACRONYMS

ACP	Access Control Point
AFB	Air Force Base
ARC	American Red Cross
ARES	Amateur Radio Emergency Services
BNL	Brookhaven National Laboratory
CAP	Civil Air Patrol
CPM	Counts per minute
DHS	New Hampshire Division of Human Services
DOC	U.S. Department of Commerce
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
DOT	U.S. Department of Transportation
DPHS	New Hampshire Division of Public Health Services
DRD	Direct-Reading Dosimeter
DRF	Dose Reduction Factor
EAL	Emergency Action Level
EBS	Emergency Broadcast System
ECL	Emergency Classification Level
EMS	New Hampshire Bureau of Emergency Medical Services of the Division of Public Health Services
EMT	Emergency Medical Technician
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EPA	U.S. Environmental Protection Agency
EPZ	Emergency Planning Zone
ERPA	Emergency Response Planning Area
ETE	Evacuation Time Estimate Study
FAA	Federal Aviation Administration
FDA	U.S. Food and Drug Administration
FEMA	Federal Emergency Management Agency
FRC	Federal Response Center
FRERP	Federal Radiological Emergency Response Plan
FRMAP	Federal Radiological Monitoring and Assessment Plan (formerly IRAP - Interagency Radiological Assistance Plan), DOE
GE	General Emergency
HHS	U.S. Department of Health and Human Services (formerly, Health, Education and Welfare)
IFO	Incident Field Office
JCAH	Joint Committee on Accreditation of Hospitals
KI	Potassium Iodide
LOA	Letter of Agreement
mR	Millirem
NAS	Nuclear Alert System
NESPAC	New England State Police Assistance Compact
NHCDA	New Hampshire Civil Defense Agency (name changed to New Hampshire Office of Emergency Management - NHOEM)
NHOEM	New Hampshire Office of Emergency Management (formerly New Hampshire Civil Defense Agency, NHCDA)
NHRERP	New Hampshire Radiological Emergency Response Plan
NHY	New Hampshire Yankee
NHY ORO	New Hampshire Yankee Offsite Response Organization

NOAA National Oceanic and Atmospheric Administration of the  
U.S. Department of Commerce  
NRC Nuclear Regulatory Commission  
PA Protective Action  
PAG Protective Action Guide  
PAR Protective Action Recommendation  
PSNH Public Service of New Hampshire  
R Roentgen  
RACES Radio Amateur Communications Emergency Services  
REM Roentgen Equivalent Man  
RCDC Rockingham County Dispatch Center  
RCNH Rockingham County Nursing Home  
RERP Radiological Emergency Response Plan  
SAE Site Area Emergency  
SS Seabrook Station  
SWFMA Southwestern Fire Mutual Aid  
TCP Traffic Control Point  
TLD Thermoluminescent Dosimeter  
TMM Traffic Management Manual  
USAF U.S. Air Force  
USCG U.S. Coast Guard  
USDA U.S. Department of Agriculture  
VY Vermont Yankee  
WSPCC New Hampshire Water Supply and Pollution Control  
Commission  
YAEC Yankee Atomic Electric Company

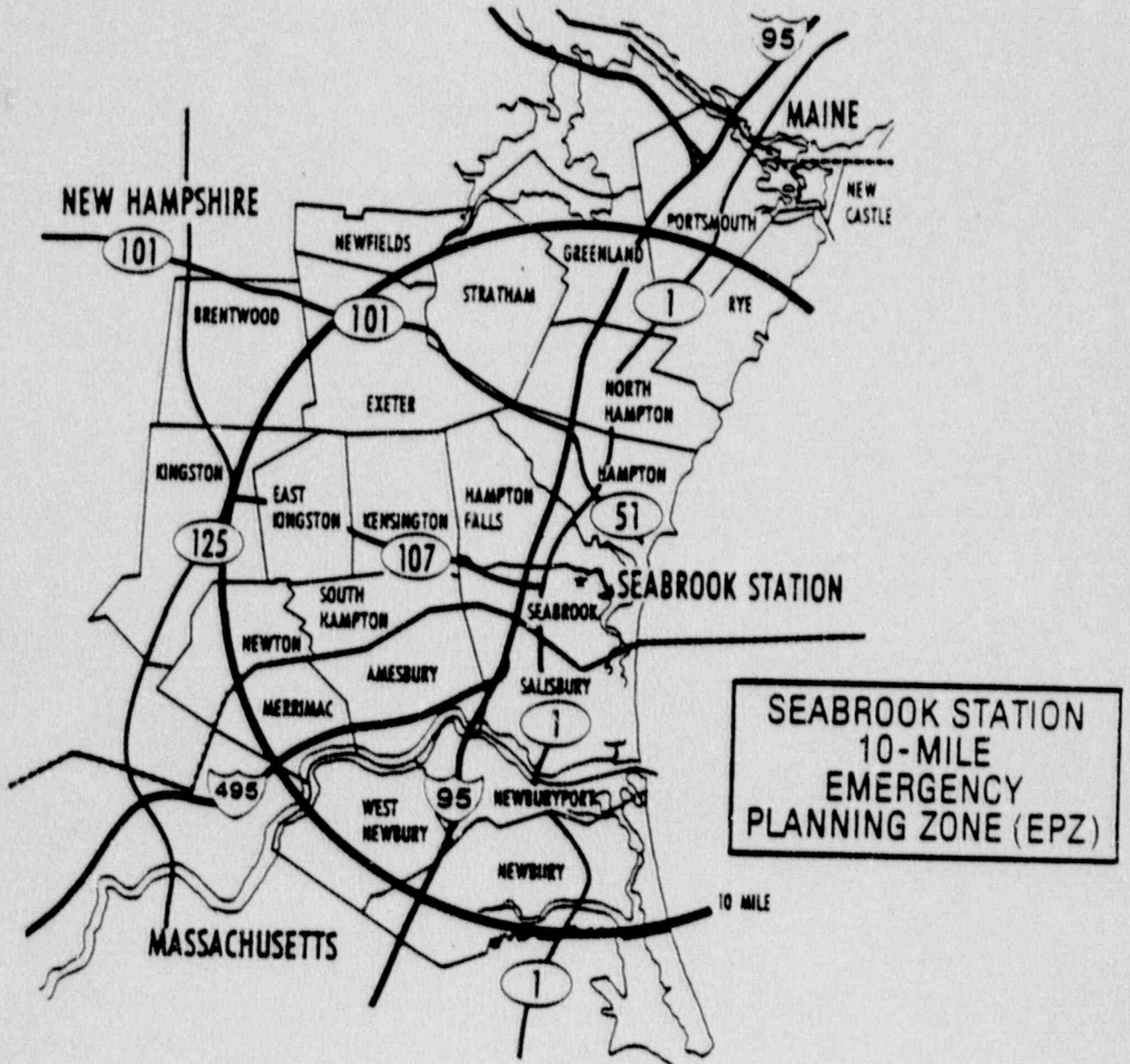


FIGURE 1 Seabrook Station Plume Exposure Emergency Planning Zone



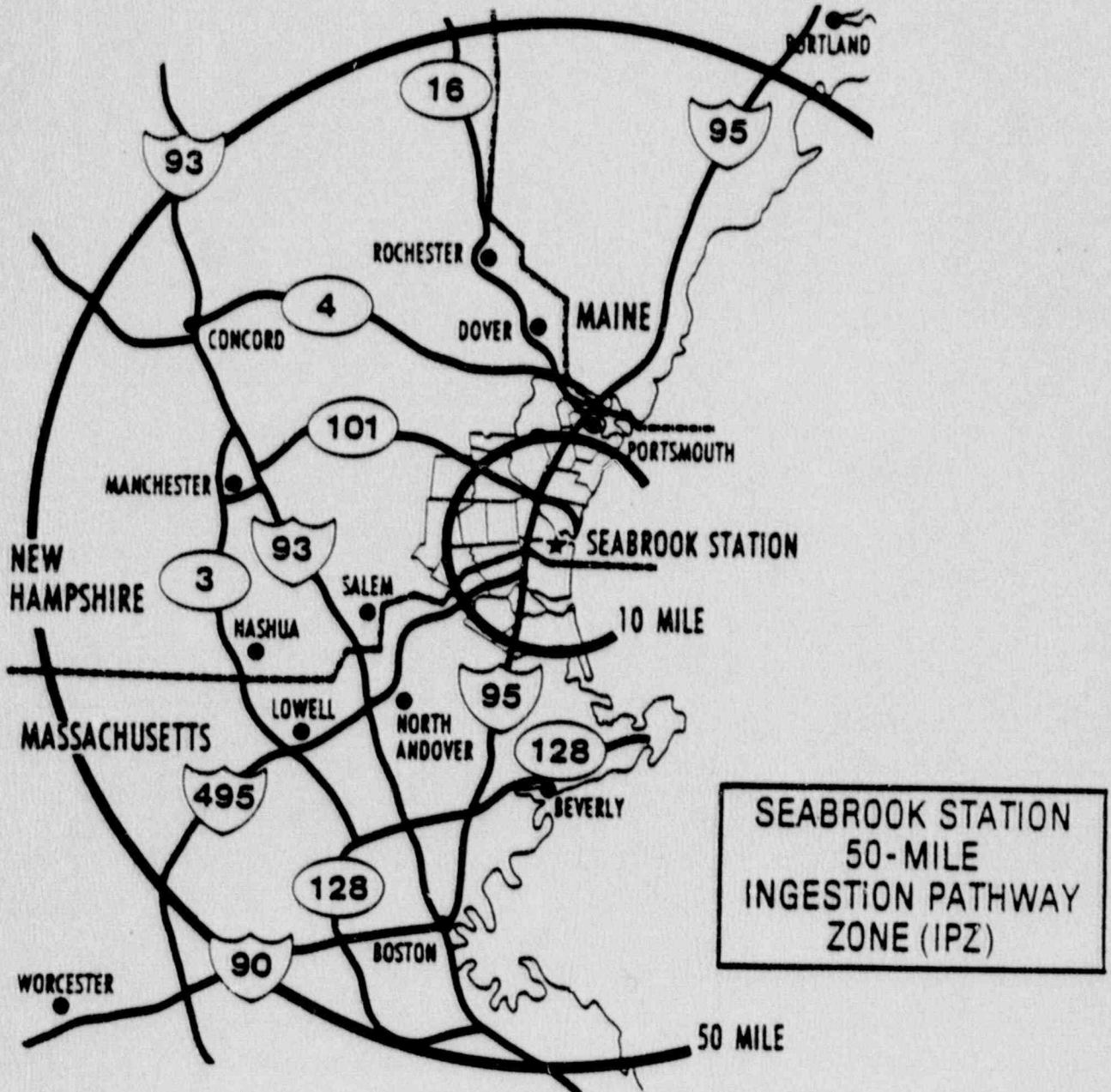


FIGURE 2 Seabrook Station Ingestion Exposure Emergency Planning Zone

**REVIEW AND EVALUATION OF THE  
STATE OF NEW HAMPSHIRE  
RADIOLOGICAL EMERGENCY RESPONSE PLAN  
FOR SEABROOK STATION**

**INTRODUCTION**

This review was conducted by the Federal Emergency Management Agency, Region I (FEMA I), with the assistance of the Regional Assistance Committee (RAC). The RAC is chaired by FEMA and has the following members: U.S. Department of Transportation, U.S. Environmental Protection Agency, U.S. Department of Energy, U.S. Food and Drug Administration, U.S. Public Health Service, U.S. Department of Health and Human Services, Nuclear Regulatory Commission, U.S. Department of Agriculture, U.S. Department of Commerce, and the U.S. Department of Interior. The Regional Assistance Committee functions in accordance with 44 CFR, Part 351, "Radiological Emergency Response Planning and Response." This FEMA review and evaluation used NUREG-0654/FEMA-REP-1, Rev. 1, November 1980 as the basis (planning standards and specific criteria) for determining the adequacy of the State of New Hampshire Radiological Emergency Response Plan for Seabrook Station. FEMA Guidance Memoranda (GM) and FEMA REP-series documents were utilized to interpret, clarify, and evaluate the criteria.

The New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook consists of the following State and local volumes:

<u>Volume Number</u>	<u>Title</u>
1	New Hampshire Radiological Emergency Response Plan
5	Implementing Procedures - Governor's Office and NHOEM
6	Implementing Procedures - Division of Public Health Services
7	Implementing Procedures - State Agencies, Rockingham County, Federal Government
8	State and Local Functional Implementing Procedures
9	State and Local Appendices
10-19	Reserved
20	Seabrook Station Local Radiological Emergency Response Plan
21	Brentwood Plan Information and Implementing Procedures
22	East Kingston Plan Information and Implementing Procedures
23	Exeter Plan Information and implementing Procedures
24	Greenland Plan information and Implementing Procedures
25	Hampton Plan Information and Implementing Procedures
26	Hampton Falls Plan Information and Implementing Procedures
27	Kensington Plan Information and Implementing Procedures
28	Kingston Plan Information and Implementing

29	New Castle Plan Information and Implementing Procedures
30	Newfields Plan Information and Implementing Procedures
31	Newton Plan Information and Implementing Procedures
32	North Hampton Plan Information and Implementing Procedures
33	Portsmouth Plan Information and Implementing Procedures
34	Rye Plan Information and Implementing Procedures
35	Seabrook Plan Information and Implementing Procedures
36	South Hampton Plan Information and Implementing Procedures
37	Stratham Plan Information and Implementing Procedures
38	Dover Host Plan Information and Implementing Procedures
39	Manchester Host Plan Information and Implementing Procedures
40	Rochester Host Plan Information and Implementing Procedures
41	Salem Host Plan Information and Implementing Procedures
42-49	Reserved
50	Letters of Agreement
NA	Seabrook Station Evacuation Time Study
NA	Seabrook Station Evacuation Time Study Handbook
NA	New Hampshire Traffic Management Manual
NA	Emergency Phone Listing

Following is a summary of the material that has been submitted to FEMA for review and evaluation:

On December 9, 1985, the State of New Hampshire submitted the New Hampshire Radiological Emergency Response Plan (NHRERP) for Seabrook Station.

In February 1986, the State of New Hampshire provided plan updates, referred to as Supplement 1, 2/86.

In April 1986, the State of New Hampshire provided plan updates referred to as Supplement 2, 4/86.

In June 1986 the State of New Hampshire provided plan updates referred to as Revision 1, 6/86.

In September 1986, the State of New Hampshire provided plan updates, referred to as Rev. 2, 8/86.

On April 29, 1988, NHY provided the Seabrook Station Public Alert and Notification System, FEMA REP-10 Design Report, dated April 30, 1988.

In May 1988, the State of New Hampshire provided plan updates, referred to as the 2/88 update to Rev. 2.



On July 29, 1988, the State of New Hampshire provided plan updates, referred to as the 6/88 update to Rev. 2.

On October 7, 1988, the State of New Hampshire provided plan updates, referred to as the 10/88 update to Rev. 2.

On October 18, 1988, NHY provided to FEMA REP-10 Addendum Report to the Seabrook Station Public Alert and Notification System Design Report.

On November 28, 1988, the State of New Hampshire provided plan updates, referred to as the 11/88 update to Rev. 2.

On November 30, 1989, the State of New Hampshire provided plan updates, referred to as Revision 3 to the NHRERP. The State of New Hampshire also provided the Emergency Phone Listing.

In December, 1989, The State of New Hampshire provided the Seabrook Station Evacuation Time Study, Seabrook Station Evacuation Time Study Handbook, and the Traffic Management Manual.

On February 5, 1990, the State of New Hampshire provided plan updates, referred to as the 2/90 update to Revision 3 to the NHRERP.

REVIEW AND EVALUATION AGAINST PLANNING STANDARDS AND EVALUATION CRITERIA

The review and evaluation of the NHRERP is attached. The format reproduces each planning standard and specific criterion of NUREG-0654/FEMA-REP-1, Rev. 1, followed by a statement of the Plan contents related to each review criterion, a Plan reference, and an evaluation section.

**REVIEW AND EVALUATION AGAINST  
PLANNING STANDARDS AND EVALUATION CRITERIA**

**A. Assignment of Responsibility (Organizational Control)  
(Planning Standard A):**

Primary responsibilities for emergency response by the nuclear facility licensee, and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

**Evaluation Criterion**

- A.1.a. Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See App. 5.)

**Statement**

- A.1.a. The Plan identifies the State, Federal, and local organizations that are part of the overall response organization (Vol. 1, Sec. 1). The interrelationship of these organizations are illustrated on Fig. 1.2-1. The primary New Hampshire State organizations are identified as the Governor's Office, the New Hampshire Office of Emergency Management (NHOEM), and the Division of Public Health Services (DPHS). In some cases private sector organizations provide resources for emergency response.

Municipal emergency response organizations are described in Sec. 1 of each of the local plans (Sec. 1.6 of Vol. 20 and Sec. 1.4 of Vols. 21-41). Twenty-one (21) municipal organizations are identified. These consist of 17 communities within the plume EPZ and 4 host communities. In those cases in which a plume EPZ community does not participate in or is unable to participate in the emergency planning or response, the State of New Hampshire will institute compensatory measures to protect the public as described in Sec. 1.2.6 of Vol. 1.

**Plan Reference**

- A.1.a. Vol. 1, Sec. 1; Vol. 20, Sec. 1.6; Vols. 21-41 (Sec.1.4).



**Evaluation**

A.1.a. Adequate.

**Evaluation Criterion**

A.1.b. Each organization and suborganization having an operational role shall specify its concept of operations, and its relationship to the total effort.

**Statement**

A.1.b. The Plan describes the concept of operation and the operational roles of the State of New Hampshire primary and support organizations in Sec. 1.2 of Vol. 1. Details of operational roles of State agencies are provided in the procedures in Vols. 5-7. Operational roles of local response organizations are provided in the local communities plans (Sec. 1.6 of Vol. 20 & Sec. 1.4 of Vols. 21-41). In those cases in which a plume EPZ community does not participate or is unable to participate in the emergency planning or response, the State of New Hampshire will institute compensatory measures to protect the public as described in Sec. 1.2.6 of Vol. 1.

**Plan Reference**

A.1.b. Vol. 1, Sec. 1.2; Vols. 5-7; Vol. 20, Sec. 1.6; Vols. 21-41, Sec. 1.4.

**Evaluation**

A.1.b. Adequate

**Evaluation Criterion**

A.1.c. Each plan shall illustrate these interrelationships in a block diagram.

**Statement**

A.1.c. The Plan illustrates the relationships between the various State, Federal, local, and utility response organizations in Fig. 1.2-1 (Sec. 1.2, Vol. 1). The relationships are described in Sec. 1.2 of Vol. 1. A diagram (Figure 2.7.1) illustrating relationships among emergency facilities is provided in the Vol. 20. The relationships are described in Sec. 1.6 (Vol. 20). A

special block diagram illustrating the relationships of the various Federal agencies which are part of the Federal response is presented as Fig. 1.4-1 of Vol. 1 and the relationships described in Sec. 1.4 of Vol. 1.

**Plan Reference**

A.1.c. Vol. 1, Figs. 1.2-1, 1.4-1 and Secs. 1.2 and 1.4; Vol. 20, Figure 2.7.1 and Sec. 1.6.

**Evaluation**

A.1.c. Adequate.

**Evaluation Criterion**

A.1.d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.

**Statement**

A.1.d. The Plan provides the identification of specific individuals by title within each of the State response agencies who are in charge of the emergency response in Vol. 1, Secs. 1.2 & 1.3. Sec. 1.2 describes the overall radiological emergency response organization for the State of New Hampshire. Sec. 1.3 identifies the specific responsibilities of each agency in the State's overall radiological emergency response organization. The specific procedures of each of these key agencies are contained in Vols. 5-7.

The Governor has ultimate command and control of all State resources. The local governments are responsible for implementing decisions reached by the State. At the local level, the individual by title who would govern the local Emergency Response Organization is identified in Sec. 1.4 and Fig. 1.4-1 of Vols. 21-41. In most cases the local plans identify the Board of Selectmen as being both the governing authority and being responsible for administrative control of the town. In a few cases, administrative control is delegated by the Board of Selectmen to the Town or City Manager (e.g., Exeter, Dover).

**Plan Reference**

A.1.d. Vol. 1, Secs. 1.2 & 1.3; Vols. 5-7; Vols. 21-41 (Sec. 1.4 & Fig. 1.4-1).

**Evaluation**

A.1.d. Adequate.

**Evaluation Criterion**

A.1.e. Each organization shall provide for 24-hour per day emergency response, including 24-hour per day manning of communications links.

**Statement**

A.1.e. The Plan (Sec. 1.2 of Vol. 1) identifies the State Police as the 24-hour warning point for the State. The State Police receive the initial notification from the Seabrook Station and then notifies appropriate agencies (Sec. 2.1 of Vol. 1). Details of communication links which support 24-hour notification are described in Sec. 2.2.3 and Tables 2.2-1 & 2.2-2 of Vol. 1. Figure 2.1-1 (Vol. 1) describes the emergency notification procedure for the 24-hour per day notification capability. Sec. 1.3 of Vol. 1 describes the responsibilities of each agency in the State's radiological emergency response organization. Each agency is to maintain an adequate emergency response capability for a 24-hour basis (two 12-hour shifts).

Local towns receive initial notification from the Rockingham County Dispatch Center. Figure 2.2-1 in Vols. 21-41 describes the emergency notification procedures. Secs. 1.4 & 2.2 of Vols. 21-41 describe the responsibilities of the local governments to maintain an adequate emergency response capability for a 24-hour basis.

The Emergency Phone list contains the various notification call out lists for all elements in the New Hampshire Emergency Response Organization.

**Plan Reference**

A.1.e. Vol. 1, Secs. 1.2, 1.3, 2.1, & 2.2.3, Tables 2.2-1 & 2.2-2, and Figure 2.1-1; Vols. 21-41, Secs. 1.4 & 2.2 and Figure 2.1-1; and the Emergency Phone Listing.

**Evaluation**

A.1.e. Adequate.

**Evaluation Criterion**

A.2.a. Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the



following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal Assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis and the function as the other. (See Sec. B for licensee.)

### Statement

- A.2.a. The Plan describes the functions and responsibilities for major elements of the emergency response by agency and/or individual in Sec. 1.3 of Vol. 1. These functions and responsibilities are illustrated on the matrices shown on Tables 1.3-1 and 1.3-2. Table 1.3-1 differentiates between preassigned and stand-by responsibility. Table 1.3-2 differentiates between primary and support responsibility. Specific responsibilities for key individuals by title are provided in the State agency procedures presented in Vols. 5-7.

The responsibilities of key individuals within the local response organizations are illustrated in the responsibility matrix presented as Table 1.6.1 in each of the local plans (Sec. 1.6 of Vols. 21-41). The descriptions of functions and responsibilities are outlined in Table 1.6-2 and are discussed in Sec. 3 of the local plans (Vols. 21-41).

In those cases in which a plume EPZ community does not participate or is unable to participate in emergency response, the State of New Hampshire will institute compensatory measures to protect the public as described in Sec. 1.2.6 of Vol. 1.

### Plan Reference

- A.2.a. Vol. 1, Secs. 1.2 & 1.3 and Tables 1.3-1 and 1.3-2; Vols. 5-7; Vols. 21-41, Sec. 3 and Tables 1.6-1 and 1.6-2.

### Evaluation

- A.2.a. Adequate.

**Evaluation Criterion**

- A.2.b. Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.

**Statement**

- A.2.b. The Plan provides the legal basis for the Governor and State emergency response agencies to implement radiological emergency response actions in Sec. 1.1 of Vol. 1, with a listing of specific statutes provided in Table 1.1-1. The New Hampshire Civil Defense Act (RSA 107) and the New Hampshire Public Defense and Veteran's Affairs Act (RSA 107-B) provide the authority for the Governor and the Director of NHCDA (now NHOEM) to develop and implement the NHRERP. The legal basis for the emergency response activities of municipalities is provided in Sec. 1.3 of Vol. 20 and Sec. 1.2 of Vols. 21-41.

**Plan Reference**

- A.2.b. Vol. 1, Sec. 1.1 and Table 1.1-1; Vol. 20, Sec. 1.3; and Vols. 21-41, Sec. 1.2.

**Evaluation**

- A.2.b. Adequate.

**Evaluation Criterion**

- A.3. Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations, or executive orders where separate written agreements are not necessary.

**Statement**

- A.3. The Plan describes the concept of operations between the response organizations in Secs. 1.2, 1.3, and 1.4 of



Vol. 1.

The State of New Hampshire and New Hampshire Yankee (NHY) have executed a Letter of Agreement to establish radiological emergency preparedness, notification, and response for the Seabrook site. It specifies concepts of operation between the two regarding alert and notification, exchanges of information, evaluation and implementation of precautionary actions for special populations, accident assessment measures for both the plume and ingestion exposure EPZs, and the coordination of public information and rumor control activities. Specific lead functions are assigned to the State of New Hampshire concerning the notification and coordination of emergency activities with the State of Maine, the USCG, the FAA, and the Boston and Maine railroad.

The State of New Hampshire and the State of Maine have executed a Letter of Agreement for the Seabrook site. It states that New Hampshire will notify Maine of ECLs and that New Hampshire and Maine will coordinate response actions.

Specific Federal assistance has been identified as required from the U.S. Coast Guard and the FAA. The Coast Guard and the FAA will be requested to restrict boat and air traffic for the plume exposure EPZ. The State of New Hampshire has signed a memorandum of understanding with the USCG and the FAA to provide control, notification, and restriction of appropriate traffic.

Letters of Agreement are found in Vol. 50.

#### Plan Reference

A.3. Vol. 1, Secs. 1.2, 1.3, & 1.4; and Vol. 50.

#### Evaluation

A.3. Adequate.

#### Evaluation Criterion

A.4. Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.

#### Statement

A.4. The Plan (Sec. 1.3.2 of Vol. 1) states that each agency



in the emergency response organization has the responsibility to assure that it can be notified and mobilized on a 24-hour basis, and that it can support the emergency response effort on a 24-hour basis (two 12-hour shifts) for the duration of a protracted emergency period. The individual, by title, who is responsible for assuring the continuity of resources for extended operations for each agency or principal response organization is provided in the State procedures (Vols. 5-7) for State agencies, and in Secs. 1.4 and 2.2 (Vols. 21-41) for local emergency response organizations. Call lists and rosters to support the capability to staff around-the-clock operations are provided in the Emergency Phone Listing.

#### Plan Reference

- A.4. Vol. 1, Sec. 1.3.2; Vols. 5-7; Vols. 21-41, Secs. 1.4 & 2.2; & Emergency Phone Listing.

#### Evaluation

- A.4. Adequate.

FEMA has reviewed staffing rosters in May of 1988 and September 1989. FEMA found that adequate numbers of staff were identified and trained to staff all designated positions on a 24-hour per day operations basis.

**C. Emergency Response Support and Resources (Planning Standard C):**

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

**Evaluation Criterion**

C.1. The Federal government maintains in-depth capabilities to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan [formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP)]. Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following:

**Evaluation Criterion**

C.1.a. Specific persons by title authorized to request Federal assistance; see A.1.d., A.2.a.

**Statement**

C.1.a. The Plan describes the process for requesting Federal assistance in Vol. 1, Secs. 1.4.4, 1.4.7, and 2.5.2. All requests for nontechnical assistance will be channeled through the Governor's Authorized Representative, the NHOEM (formerly NHCDA) Director. The NHOEM Director requests nontechnical support from FEMA. The DPHS EOC Radiological Health Technical Advisor will request technical support from DOE.

**Plan Reference**

C.1.a. Vol. 1, Secs. 1.4 & 2.5.2.

**Evaluation**

C.1.a. Adequate.

**Evaluation Criterion**

C.1.b. Specific Federal resources expected, including expected times of arrival at specific nuclear facility sites.

**Statement**

C.1.b. The Plan describes the expected Federal resources and times of arrival in Sec. 1.4 and on Table 1.4-1 of Vol. 1.

**Plan Reference**

C.1.b. Vol. 1, Sec. 1.4 and Table 1.4-1.

**Evaluation**

C.1.b. Adequate.

**Evaluation Criterion**

C.1.c. Specific licensee, State, and local resources available to support the Federal response, e.g., air fields, command post, telephone lines, radio frequencies and telecommunications centers.

**Statement**

C.1.c. The Plan describes the resources which will be made available to support the Federal response in Section 1.4. (Vol. 1). These resources include: the State EOC in Concord which is equipped to support FEMA representatives; the utility-operated EOF which will support the NRC, FEMA, and DOE; air transportation and ground transportation provided by the CAP; and nearby airports for use by Federal aircraft (see Table 1.4-2). Federally operated facilities which may be established are described in Sec. 2.4 of Vol. 1.

**Plan Reference**

C.1.c. Vol. 1, Secs. 1.4 and 2.4, & Table 1.4-2.

**Evaluation**

C.1.c. Adequate.

**Evaluation Criterion**

C.2.a. Each principal off-site organization may dispatch representatives to the licensee's near-site Emergency Operation Facility. (State technical analysis representatives at the near-site EOF are preferred.)

**Statement**

C.2.a. The Plan indicates in Sec. 2.4 and on Table 2.4-4 of Vol. 1 that the Division of Public Health Services (DPHS), NHOEM, and other State agencies will report to



the IFO/EOF at the Alert ECL. Accident assessment analysis will be performed for the State at the IFO/EOF by the Division of Public Health Services. Procedures for key agency representatives who will be located at the IFO/EOF are found in State procedures (Vols. 5-7).

It is not anticipated that local emergency response organizations will dispatch representatives to the IFO/EOF.

**Plan Reference**

C.2.a. Vol. 1, Sec. 2.4, Table 2.4-4; Vols. 5-7.

**Evaluation**

C.2.a. Adequate.

**Evaluation Criterion**

C.3. Each organization shall identify radiological laboratories and their general capabilities and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.

**Statement**

C.3. The Plan describes the capabilities of the DPHS Laboratories in Concord for providing radiological analyses in Sec. 2.5 (Vol. 1). Equipment available and sample analysis capabilities at the DPHS Laboratories is listed in App. D, Vol. 9.

The Plan (Sec. 2.5, Vol. 1) states that the capabilities of the DPHS laboratories can be supplemented through the New England Compact on Radiological Health Protection which is described in Vol. 50, in the New England Interstate Radiation Assistance Plan, which was developed in accordance with Article III of the Compact.

**Plan Reference**

C.3. Vol. 1, Sec. 2.5; Vol. 9, App. D; & Vol. 50.

**Evaluation**

C.3. Adequate.

facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

**Statement**

C.4. The Plan states in Sec. 1.3.2 of Vol. 1 that New Hampshire has written agreements with other organizations regarding the provision of public and private resources during a radiological emergency response. The New Hampshire Office of Emergency Management has the responsibility to ensure that adequate resources are identified to meet the emergency response needs. The New Hampshire Office of Emergency Management has the responsibility to maintain current letters of agreement with various resource providers.

Copies of these agreements are provided in Vol. 50. These documents represent agreements with: other states; bus providers; ambulance providers; private trucking companies to supply emergency bus drivers; towing companies; transportation staging area managers; fuel providers; EBS radio stations; county sheriffs departments; New Hampshire agencies; selected special facility managers; host health care facilities; hospitals; American Red Cross; and provider of permanent record dosimeters and reading services.

**Plan Reference**

C.4. Vol. 1, Sec. 1.3.2; & Vol. 50.

**Evaluation**

C.4. Adequate.

FEMA received from New Hampshire in January of 1989 and January of 1990 annual letters of certification. The annual letters of certification state that the various agreements contained in Vol. 50 are current.

**D. Emergency Classification System (Planning Standard D):**

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by facility licensees for determinations of minimum initial off-site response measures.

**Evaluation Criterion**

- D.3. Each State and local organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility licensee.

**Statement**

- D.3. The Plan (Sec. 1.5 of Vol. 1 and Sec. 1.7 of Vol. 20) describes the emergency classification system which is used to initiate emergency response. The emergency classification levels are Notice of Unusual Event, Alert, Site Area Emergency, and General Emergency.

**Plan Reference**

- D.3. Vol. 1, Sec. 1.5; Vol. 20, Sec. 1.7.

**Evaluation**

- D.3. Adequate.

**Evaluation Criterion**

- D.4. Each State and local organization should have procedures in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local off-site conditions that exist at the time of the emergency.

**Statement**

- D.4. The Plan describes the written procedures which provide for emergency actions consistent with the emergency classification levels in Sec. 2.6 of Vol. 1 and Sec. 2.11 of Vol. 20. State procedures are contained in Vols. 5-7. Local community procedures are provided in Sec. 3 of Vols. 21-41.



**Plan Reference**

D.4. Vol. 1, Sec. 2.6; Vol. 20, Sec. 2.11; Vols. 21-41,  
Sec. 3.

**Evaluation**

D.4. Adequate.

**E. Notification Methods and Procedures (Planning Standard E):**

Procedures have been established for notification by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

**Evaluation Criterion**

- E.1. Each organization shall establish procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in App. 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.

**Statement**

- E.1. The Plan (Sec. 2.1 of Vol. 1) states that the notification of response organizations is triggered by the standard four level ECL scheme set forth in App. 1 of NUREG-0654, FEMA-REP-1, Rev. 1. The initial notification is from Seabrook Station to the New Hampshire State Police Communication Center. The State Police Communication Center then notifies DPHS, NHOEM (formerly NHCDA), and the Rockingham County Dispatch Center. NHOEM, in turn, notifies the other State agencies comprising the State emergency response organization. The Rockingham County Dispatch Center notifies all local emergency response organizations. This notification procedure is illustrated on Fig. 2.1-1. The notification sequence is shown on Tables 2.1-1 and 2.1-2.

**Plan Reference**

- E.1. Vol. 1, Sec. 2.1, Tables 2.1-1 and 2.1-2, Fig. 2.1-1.

**Evaluation**

- E.1. Adequate.

**Evaluation Criterion**

- E.2. Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.

**Statement**

- E.2. The Plan describes the procedures for the notification of State and local government emergency response personnel. Notification methods including appropriate verification process and procedures are described in Sec. 2.1.2 of Vol. 1 and in Sec. 2.3 of Vol. 20. Specific State communication procedures for notification are provided in Vols. 5-7 and in the Emergency Phone Listing. Specific local government communication procedures are provided in Sec. 3 of Vols. 21-41 and in the Emergency Phone Listing.

**Plan Reference**

- E.2. Vol. 1, Sec. 2.1; Vol. 20, Sec. 2.3; Vols. 5-7; Vols. 21-41, Sec. 3; and Emergency Phone Listing.

**Evaluation**

- E.2. Adequate.

**Evaluation Criterion**

- E.5. State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow up messages received from the licensee including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

**Statement**

- E.5. The Plan (Sec. 2.1 of Vol. 1) states that the primary means for disseminating information to the public is EBS. Dissemination of information and instructions is described in Vol. 1, Secs. 2.1.4 and 2.1.5, and in local plans, Vol. 20, Sec. 2.5. Other alerting means will include the U.S. Coast Guard notification of boaters in offshore waters within 10 miles of the plant and the FAA notification to pilots regarding closure of the air space. Activation of the EBS is described in Sec. 2.1.5 of Vol. 1 and in Appendix B1.1 of Vol. 9. A list of EBS messages is found in Appendix B2.0 of Vol. 9. The texts of prerecorded EBS messages are found in Appendix B2.1 of Vol. 9. The texts of prescribed EBS messages are found in Appendix B2.2 of Vol. 9. It is the responsibility of the NHOEM EOC Operations Officer to coordinate the activation of the EBS system with the



activation of the Alert and Notification System sirens. It is the responsibility of the EOC Media Liaison to prepare the EBS Messages and the responsibility of the NHOEM Director to approve the message content. The Communications Officer is responsible for establishing availability and contact with EBS. The Rockingham County Dispatch Center is responsible for the activation of the alert siren system (Vol. 7, Secs. 14.13 & 14.14). The Plan (Sec. 10.3 of Vol. 7) contains provisions for the State Police Communications Center to activate the EBS if a General Emergency has been declared and to direct the activation of the alert siren system if the NHOEM cannot be contacted within 10 minutes.

**Plan Reference**

E.5. Vol. 1, Sec. 2.1; Vol. 7, Secs. 10.3, 14.13, & 14.14; Vol.9, App. B; and Vol. 20, Sec. 2.5.

**Evaluation**

E.5. Adequate.

**Evaluation Criterion**

E.6. Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instruction to the public within the plume exposure pathway Emergency Planning Zone. (See App. 3.) It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

**Statement**

E.6. The Plan describes the Public Alerting System in Sec. 2.1.4 of Vol. 1 and Sec. 2.5 of Vol. 20. The Seabrook siren system, within the State of New Hampshire, consists of 94 sirens, the locations of which are summarized on Table 2.1-3 and shown on Fig. 2.1-2. Sirens can be operated either in a siren mode or a public address mode. The New Hampshire Yankee's FEMA REP-10 and FEMA REP-10 Addendum reports describe the design basis for the Seabrook Station Public Alert and Notification System.

The primary siren activation and control point (alert system) is the Rockingham County Dispatch Center (RCDC) with backup activation from the Seabrook Station Control Room. The New Hampshire municipalities within the Plume

EPZ can also activate the sirens within their boundaries. When the State EOC is activated, NHOEM will direct the RCDC to activate the sirens. In the event of a fast-breaking emergency, the State Police Communication Center (SPCC) can direct RCDC to activate the sirens.

During the period of heaviest beach use (May 15-Sept 15) precautionary beach closing may be considered as early as the Alert ECL. If this action is taken, the sirens covering the beach areas will be used in the P.A. mode to alert the beach population of beach closing. This can be done by use of the beach sirens in the P.A. mode with a pre-recorded voice message.

Tone-alert radios have been provided to institutions, special needs facilities, and special needs persons. These tone-alert radios will be activated by a signal broadcast by the designated EBS station. For the hearing impaired, the tone-alert radios will be equipped with special signaling devices. These tone-alert radios are a supplemental system to the primary siren system.

Means of alerting boaters in offshore waters will be provided by the U.S. Coast Guard (USCG). The State of New Hampshire has an agreement with the USCG stating that the State will request the establishment of a marine safety zone. The USCG will establish a marine safety zone with appropriate notices to mariners broadcast over mariner radio channels. The State can provide personnel and equipment from the Department of Safety Services, Division of Boating Safety, to supplement the USCG alerting and notification activities. By agreement with New Hampshire Yankee, the State of New Hampshire requests such marine alerting and notification by the USCG for the offshore waters in the Seabrook Plume EPZ.

The State of New Hampshire has an agreement with the U.S. Federal Aviation Administration (DOT) for the establishment of an air space restriction and the notification of aircraft. By agreement with New Hampshire Yankee, the State of New Hampshire requests such alerting and notification by the DOT for the Seabrook Plume EPZ.

#### Plan Reference

- E.6. Vol. 1, Sec. 2.1, Table 2.1-3, & Figure 2.1-2; Vol. 20, Sec. 2.5; Vol. 50; FEMA REP-10 and FEMA REP-10 Addendum Reports.

**Evaluation**

## E.6. Adequate.

The Seabrook Station Public Alert and Notification System Design has been found to meet the specific design requirements of FEMA REP-10. The current administrative and physical means meet the 15-minute design objectives of NUREG-0654/FEMA-REP-1, Rev. 1. The Seabrook siren system within the State of New Hampshire has been installed as specified in the FEMA REP-10 and FEMA REP-10 Addendum reports and as described in Sec. 2.1 of Vol. 1 (NHRERP). The Seabrook siren system became operational effective October 1989.

**Evaluation Criterion**

- E.7. Each organization shall provide written messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans. Such messages should include the appropriate aspects of sheltering, ad hoc respiratory protection, e.g., handkerchief over mouth, thyroid blocking or evacuation. The role of the licensee is to provide supporting information for the messages. For ad hoc respiratory protection see "Respiratory Protective Devices Manual" American Industrial Hygiene Association, 1963, pp. 123-126.

**Statement**

- E.7. The Plan contains the prescribed EBS messages and describes the prerecorded messages. These messages are included in App. B of Vol. 9. The messages are scripted for the range of ECLs and protective actions. The Plan describes the dissemination of these messages in Sec. 2.1.5 of Vol. 1 and Sec. 2.5 of Vol. 20.

**Plan Reference**

- E.7. Vol. 1, Sec. 2.1.5; Vol. 9, App. B; and Vol. 20, Sec. 2.5.

**Evaluation**

- E.7. Adequate.



**F. Emergency Communication (Planning Standard F):**

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

**Evaluation Criterion**

F.1. The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be compatible with one another. Each plan shall include:

F.1.a. Provision for 24-hour per day notification to and activation of the State/local emergency response network; and at a minimum, a telephone link and alternate, including 24-hour per day manning of communication links that initiate emergency response actions.

**Statement**

F.1.a. The Plan describes the initial notification process from the Seabrook Station to the State Police Communications Center in Sec. 2.1.2 of Vol. 1. The designated communications link is the Nuclear Alert System (NAS). The State Police Communications Center, which operates on a 24-hour basis, then contacts NHOEM, DPHS and the Rockingham County Dispatch Center (RCDC) by commercial telephone. The RCDC, in turn, notifies the local response organizations by local dispatch radio, and the NHOEM notifies the State emergency response organizations by commercial telephone.

Communications systems used in the initial notification of emergency response organizations are described in Sec. 2.1.2 of Vol. 1, in Sec. 2.3 of Vol. 20, and in Sec. 2.3 of Vols. 21-41. The communications links for the initial notification are shown on Fig. 2.2-1. The communications equipment present at State facilities is described in Sec. 2.2 (Vol. 1) and is shown on Table 2.2-1. The designation of primary and secondary communications links between each of the key emergency response facilities are shown on Table 2.2-2.

**Plan Reference**

F.1.a. Vol. 1, Secs. 2.1.2, 2.2, Tables 2.2-1 and 2.2-2, Fig. 2.2-1; Vol. 20, Sec. 2.3; Vols. 21-41, Sec. 2.3.

**Evaluation**

F.1.a. Adequate.

**Evaluation Criterion**

F.1.b. Provision for communications with contiguous State/local governments within the Emergency Planning Zones.

**Statement**

F.1.b. The Plan provides for communications with contiguous states (Massachusetts and Maine) and NHY ORO by means of the Nuclear Alert System (NAS) for communications with Massachusetts and NHY ORO; and by commercial telephone and NAWAS for communications with Maine. Communications capabilities are described in Sec. 2.2 (Vol. 1) and in the local plans (Sec. 2.4 of Vol. 20 & Sec. 2.3 of Vols. 21-41).

The primary and backup communications systems between the various emergency response facilities are shown on Table 2.2-2 (Vol. 1). These include communications between State EOC, local EOCs, and other emergency facilities.

**Plan Reference**

F.1.b. Vol. 1, Sec. 2.2, Table 2.2-2; Vol. 20, Sec. 2.4; and Vols. 21-41, Sec. 2.3.

**Evaluation**

F.1.b. Adequate.

**Evaluation Criterion**

F.1.c. Provision for communications as needed with Federal emergency response organizations.

**Statement**

F.1.c. The Plan (Sec. 2.2, Vol. 1) indicates that the primary communications link with Federal agencies will be commercial telephone, NAWAS (a FEMA dedicated telephone system), or FTS (a Federal telecommunication system).

**Plan Reference**

F.1.c. Vol. 1, Sec. 2.2.

**Evaluation**

F.1.c. Adequate.

**Evaluation Criterion**

F.1.d. Provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams.

**Statement**

F.1.d. The Plan describes the communications capabilities between the various emergency response facilities in Sec. 2.2 (Vol. 1). The primary communication system between Seabrook Station and the EOF is the Nuclear Alert System (NAS). Communication capabilities between the other emergency response facilities are summarized on Table 2.2-1. Communication capabilities of the local governments are discussed in Sec. 2.3 of Vols. 21-41. Communications between the field monitoring teams and the State EOC or the IFO/EOF will be by mobile high- and low-band Civil Defense Radio.

**Plan Reference**

F.1.d. Vol. 1, Sec. 2.2, Table 2.2-1; Vols. 21-41, Sec. 2.3.

**Evaluation**

F.1.d. Adequate.

**Evaluation Criterion**

F.1.e. Provision for alerting or activating emergency personnel in each response organization.

**Statement**

F.1.e. The Plan describes the provisions for alerting emergency personnel in each response organization in Sec. 2.1 of Vol. 1 and Sec. 2.2 of Vols. 21-41. Phone numbers are contained in the Emergency Phone Listing.



**Plan Reference**

F.1.e. Vol. 1, Sec. 2.1; Vols. 21-41, Sec. 2.2; and Emergency Phone Listing.

**Evaluation**

F.1.e Adequate.

**Evaluation Criterion**

F.2. Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exist.

**Statement**

F.2. The Plan (in Sec. 2.2.8 of Vol. 1 and in Sec. 2.4 of Vol. 20) describes the uniform, state-wide, four-channel emergency medical communication system which has been installed in the Seabrook EP2. All fixed and mobile EMS radios have a common frequency (155.175 mhz). Each medical Regional Coordination Center (RCC) is equipped with a four-channel base station which includes this common frequency, two hospital-to-ambulance frequencies, and hospital-to-hospital frequency. For the Seabrook site, the RCC is the Rockingham County Dispatch Center.

**Plan Reference**

F.2. Vol. 1, Sec. 2.2.8; Vol. 20, Sec. 2.4.

**Evaluation**

F.2. Adequate.

**Evaluation Criterion**

F.3. Each organization shall conduct periodic testing of the entire emergency communications system (see evaluation criteria H.10, N.2.a, and App. 3).

**Statement**

F.3. The Plan in Secs. 2.2.9 and 3.1.2 of Vol. 1 and Sec. 2.4 of Vol. 20 provides for periodic testing of the State's communications systems. Table 3.1-1 (Vol. 1) specifies the frequency of communications drills for each of the major communications links. FEMA notes that most of the communications equipment is used on a daily basis.

Testing of the siren and tone-alert radio public alerting system is described in Sec. 2.1.4 (Vol. 1).

**Plan Reference**

F.3. Vol. 1, Secs. 2.1.4, 2.2.9, and 3.1.2, Table 3.1-1; Vol. 20, Sec. 2.4.

**Evaluation**

F.3 Adequate.

**G. Public Education and Information (Planning Standard G):**

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance and procedures for coordinated dissemination of information to the public are established.

**Evaluation Criterion**

G.1. Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:

- a. education information on radiation;
- b. contact for additional information
- c. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radio protective drugs, (and protective measures related to the ingestion pathway)<sup>1</sup>; and
- d. special needs of the handicapped.

Means for accomplishing this dissemination may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; posting in public areas; and publications distributed on an annual basis.

**Statement**

G.1. The Plan describes the Public Education program and the information materials in Vol. 1, Secs. 2.3.2 through 2.3.5 and Table 2.3-1, and in Vol. 20, Sec. 2.6 and Table 2.6-1. The New Hampshire public information material consists of documents which will be made available to the public in the plume EPZ on an annual basis. The various documents describe the emergency planning program and provide information on what the members of the public should do in the case of a radiological emergency at the Seabrook Station.

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1. This language has been added to Evaluation Criterion G.1 in accordance with FEMA Guidance Memorandum IN-1, to stress applicability to ingestion pathway concerns. According to current FEMA guidance, the public information materials designed to meet the requirements of FEMA Guidance Memorandum IN-1 do not have to be published until June 12, 1990.



The public education program does not include the provision of information in telephone books. The Plan does not describe the public education program or discuss the public educational material for protective measures related to the ingestion pathway.

**Plan Reference**

- G.1. Vol. 1, Secs. 2.3.2., 2.3.3., 2.3.4 and 2.3.5 & Table 2.3-1; Vol. 20, Sec. 2.6 & Table 2.6-1.

**Evaluation**

- G.1. Adequate.

New Hampshire has prepared a farmers brochure in order to provide public education material for the ingestion pathway. The State has indicated (letter dated 1/9/90) that a discussion of the farmers brochure and a summary of the distribution scheme will be added to the NHRERP as part of the 1990 annual update.

FEMA has reviewed the information calendar and the supplementary materials for the plume EPZ, and the farmers brochure for ingestion EPZ. FEMA's REP-11 review and evaluation has found the documents adequate. Copies of the reports (REP-11 review and evaluations) are available at FEMA Region I.

**Evaluation Criterion**

- G.2. The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated as least annually. Signs or other measures (e.g., decals, posted notices or other means, placed in hotels, motels, gasoline stations and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.

**Statement**

- G.2. The methods of disseminating emergency planning

information to the permanent residents and transients within the Seabrook plume EPZ are described in Vol. 1, Secs. 2.3.2 through 2.3.5 and summarized on Table 2.3-1 and in Vol. 20, Sec. 2.6 and Table 2.6-1. The methods include distribution of calendars and brochures, adhesive labels, and posters to be displayed in public places.

### Plan Reference

- G.2. Vol. 1, Secs. 2.3.2, 2.3.3, 2.3.4, 2.3.5, & Table 2.3-1; Vol. 20, Sec. 2.6 & Table 2.6-1.

### Evaluation

- G.2. Adequate.

Calendars were distributed to the public in the plume EPZ in 1988 (1989 Calendar) & 1989 (1990 Calendar). The fliers, posters, and labels were distributed to special facilities, State parks, and local governments in the plume EPZ in the fall of 1989. Signs have been placed at the all-year parks in the plume EPZ. Signs will be placed at the seasonal parks, campgrounds, etc. in the plume EPZ during the periods of use by the public, beginning in 1990. The farmers brochure was distributed to farmers and food processors located in the plume EPZ in the fall of 1989. Subsequent distribution will be made as needed and in conjunction with the annual update of the agriculture and food processors facilities listing in 1990. A supply of farmers brochures has been established at the State EOC for distribution in the event of an emergency.

### Evaluation Criterion

- G.3.a. Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

### Statement

- G.3.a. The State has designated (Vol. 1, Secs. 2.3.6 & 2.4.2) the NHY Media Center as the central location for media contact with the State of New Hampshire. Utility, State and Federal spokespersons will be stationed at the Media Center which is located at the Newington Town Hall. The Joint Telephone Information Center (JTIC) is designated as the location at which media representatives can make telephone inquiries.

The Plan does not require local communities to be present at the Media Center. If the local communities

elect to release information to media representatives, they will advise the Media Center of their intent, will establish a local briefing room, and the briefings will be limited to local response activities (Vol. 20, Secs. 2.6 & 2.7).

#### Plan Reference

G.3.a. Vol. 1, Secs. 2.3.6 and 2.4.2; Vol. 20, Secs. 2.6 & 2.7.

#### Evaluation

G.3.a. Adequate.

#### Evaluation Criterion

G.4.a. Each principal organization shall designate a spokesperson who should have access to all necessary information.

#### Statement

G.4.a. The Plan states that the official spokesperson for New Hampshire will be the Governor's designated representative, referred to as the Media Representative (Vol. 1, Sec. 2.3.6 and Vol. 5, Secs. 1.0 & 17.0). The Media Representative will be located at the Media Center. The Media Representative, upon arriving at the Media Center, establishes contact with the NHOEM Media Center Technical Assistant, Federal Public Information Representatives, the NHY Emergency News Manager, the NHY ORO Public Information Coordinator, the Massachusetts Media Center Representatives (if available), the Maine Media Center Representatives (if available), and the NHOEM Media Relations/Rumor Control Liaison. He (she) also establishes communications with the Media Liaison at the State EOC.

The Media Representative receives (via telecopier) from the State EOC and reviews all news advisories approved for release by the Governor or the NHOEM Director. The Media Representative will coordinate these advisories with other public information personnel at the Media Center. The Media Representative receives (via telecopier) and reviews copies of all EBS messages approved for release from the EOC Media Liaison. The Media Representative will instruct administrative staff to log and coordinate distribution of news advisories and EBS messages to media representatives at the media center, to the wire services, and to the Media Relations/Rumor Control Liaison.

The Media Representative participates in all media



briefings at the Media Center. The Media Representative is responsible for preparing the briefing text for news briefings. The Media Representative will advise the State EOC Media Liaison of the content of news briefings and any significant rumors or trends in public or media inquiries received from the Joint Telephone Information Center. The Media Representative will contact the State EOC Media Liaison with any questions that could not be answered from the media during the news briefings.

**Plan Reference**

G.4.a. Vol. 1, Sec. 2.3.6; Vol. 5, Secs. 1.0 & 17.0.

**Evaluation**

G.4.a. Adequate.

**Evaluation Criterion**

G.4.b. Each organization shall establish arrangements for timely exchange of information among designated spokespersons.

**Statement**

G.4.b. The Plan states (Vol. 1, Sec. 2.3.6) that the New Hampshire Media Representative will coordinate news releases with other organizations designated spokespersons at the Media Center.

**Plan Reference**

G.4.b. Vol. 1, Sec. 2.3.6; Vol. 5, Sec. 17.0.

**Evaluation**

G.4.b. Adequate.

**Evaluation Criterion**

G.4.c. Each organization shall establish coordinated arrangements for dealing with rumors.

**Statement**

G.4.c. The Plan (Vol. 1, Sec. 2.3.6) states that the State of New Hampshire rumor control activities are to be carried out at the Joint Telephone Information Center in Newington, NH. The State, NHY ORO, and the utility will

share a common toll-free "800" telephone number for the public and media to call during an emergency. State representatives (Vol. 5, Secs. 22.0, 23.0, 24.0, & 25.0) will be available at the Joint Telephone Information Center to respond to public and media inquiries regarding offsite protective action recommendations. Rumor control staff will be responsible for interfacing with the public. They will be responsible for detecting false rumors that may be circulating and to help prevent the proliferation of false rumors.

The procedures for the Media Representative (Vol. 5, Sec. 17.0) indicate that he/she is to advise the State EOC Media Liaison of any significant rumors received in the Media Center via the Media Relations/Rumor Control Liaison. Rumor control activities will include correcting the misinformation at its source if it can be identified. Special briefings, EBS messages, or news releases may be made to advise the media and public about false rumors.

#### Plan Reference

G.4.c. Vol. 1, Sec. 2.3.6; Vol. 5, Secs. 17.0, 22.0, 23.0, 24.0, & 25.0.

#### Evaluation

G.4.c. Adequate.

#### Evaluation Criterion

G.5. Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

#### Statement

G.5. The Plan (Vol. 1, Sec. 2.3.6) indicates that NHY will conduct annual media briefings to inform the media about emergency response organization's plans, basic information about radiation, concepts of operations, and how distribution of news information will be handled in an emergency. The State of New Hampshire will be an active participant in these annual media briefings.

#### Plan Reference

G.5. Vol. 1, Sec. 2.3.6.

**Evaluation**

G.5. Adequate.

The State of New Hampshire began its participation in 1988 with New Hampshire Yankee in the annual media briefings for Seabrook Station.



**H. Emergency Facilities and Equipment (Planning Standard H)**

Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

**Evaluation Criterion**

H.3. Each organization shall establish an emergency operations center for use in directing and controlling response functions.

**Statement**

H.3. The Plan states that the State of New Hampshire and local communities have each established Emergency Operations Centers (EOCs). The EOCs are described in Sec. 2.4.2 of Vol. 1 and in Secs. 2.4 of Vols. 21-41. Each of these EOCs will serve as the command and control center for emergency response operations within the individual jurisdictions, and for communicating with other jurisdictions. Tables 2.4-1 and 2.4-3 lists the EOCs, as well as other emergency response facilities.

**Plan Reference**

H.3. Vol. 1, Sec. 2.4.2, Tables 2.4-1 & 2.4-3; Vols. 21-41, Sec. 2.4.

**Evaluation**

H.3. Adequate.

**Evaluation Criterion**

H.4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

**Statement**

H.4. The Plan describes the staffing and activation of the State's emergency response facilities in Vol. 1, Sec. 2.4.3 and in Vol. 20, Sec. 2.7. The staffing of the State's emergency response facilities is summarized on Table 2.4-4. Table 2.4-4 illustrates the status of activation and the staffing by each State organization of the appropriate facilities for the various emergency classification levels. The staffing and activation of the local government's emergency response facilities is described in Vols. 21-41, Sec. 2.4.

Following is a summary of the various facilities and activation status:

- The State EOC in Concord is operated by NHOEM and is activated at the Alert ECL.
- Local EOCs are activated at no later than the Site Area Emergency ECL.
- The IFO/EOF is a State facility collocated with the Utility-operated EOF at the Newington Station in Newington, New Hampshire. Both the IFO/EOF and EOF are activated at the Alert ECL.
- The Media Center is a utility operated facility which is activated at the Alert ECL.
- State Staging Areas are managed by Rockingham County Sheriff's Department personnel who are placed on standby at the Alert ECL. The Staging Areas may be partially activated at the Alert ECL and they will be fully activated at the SAE ECL.
- Reception Centers are State operated facilities which are located in local host communities. Reception Center operations are managed by the New Hampshire Division of Human Services. The NHOEM will request the activation of Reception Centers upon the decision of the Governor to evacuate all or part of the plume EPZ, or when an evacuation may be imminent. The Division of Human Services procedures and the host community plans specify the process for mobilizing and staffing the reception centers.
- Monitoring and Decontamination facilities are State operated facilities which are located with each Reception Center. An additional facility has been designated as a emergency worker monitoring and decontamination facility. These facilities will be activated, as required, to support the emergency response effort.
- Mass Care Shelters are facilities operated by the American Red Cross. The Mass Care Shelters will be opened selectively based upon the need for this service.
- The DPHS Laboratory is a facility operated by the State for the analysis necessary to support State field monitoring and dose assessment activities. The DPHS Laboratory will be activated, as required, to support the emergency response effort.

#### Plan Reference

H.4. Vol. 1, Sec. 2.4.3, Table 2.4-4; Vol. 20, Sec. 2.7; Vols. 21-41, Sec. 2.4.

#### Evaluation

H.4. Adequate.

**Evaluation Criterion**

- H.7. Each organization, where appropriate, shall provide for off-site radiological monitoring equipment in the vicinity of the nuclear facility.

**Statement**

- H.7. The Plan states that the State has made provisions for offsite radiological monitoring equipment for both environmental monitoring (Vol. 1, Sec. 2.5) and personnel exposure monitoring (Vol. 1, Sec. 2.7) in the vicinity of the Seabrook Station. Contents of the environmental kits are described in Vol. 9, App. D. An inventory of monitoring equipment at reception centers is provided in Vol. 9, App. D.

**Plan Reference**

- H.7. Vol. 1, Secs. 2.5 & 2.7; Vol. 9, App. D.

**Evaluation**

- H.7. Adequate.

**Evaluation Criterion**

- H.10. Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those which are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.

**Statement**

- H.10. The Plan, Sec. 2.4.5 (Vol. 1), states that provisions have been made to inspect, inventory, and operationally check the equipment to be used for implementing an emergency response at least every calendar quarter and after every use. Radiological monitoring equipment will be calibrated in accordance with established calibration schedules. A sufficient reserve of equipment and instruments is on hand according to the Plan (Vol. 9, App. D). The local plans (Vol. 20, Sec. 3.4.3 and Vols. 21-41, Sec. 1.5) reflect the commitment to inventory emergency equipment quarterly and to inventory and check radiological monitoring equipment on a quarterly basis.



**Plan Reference**

- H.10. Vol. 1, Sec. 2.4.5; Vol. 9, App. D; Vol. 20, Sec. 3.4.3;  
Vols. 21-41, Sec. 1.5.

**Evaluation**

- H.10. Adequate.

**Evaluation Criterion**

- H.11. Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communication equipment, radiological monitoring equipment and emergency supplies).

**Statement**

- F.11. The Plan (Vol. 9, App. D) contains lists of emergency kits by category. Emergency communications equipment is described in Sec. 2.2.2 (Vol. 1) and is listed by facility on Table 2.2-2. Field monitoring kits are briefly described in Sec. 2.5.3 (Vol. 1) and the contents of these kits are listed in Vol. 9, App. D. DPHS laboratory equipment is listed in Vol. 9, App. D. Dosimetry and monitoring equipment is listed by facility in Vol. 9, App. D.

**Plan Reference**

- H.11. Vol. 1, Secs. 2.2.2, 2.5.3, and Table 2.5-2 and 2.7-1;  
Vol. 9, App. D.

**Evaluation**

- H.11. Adequate.

**Evaluation Criterion**

- H.12. Each organization shall establish a central point (preferably associated with the licensee's near-site Emergency Operations Facility), for the receipt and analysis of all field monitoring data and coordination of sample media.

**Statement**

- H.12. The Plan (Sec. 2.5.3, Vol. 1) states that the State of New Hampshire will establish its accident assessment

function at the IFO/EOF at the Newington Station in Newington, N.H. The New Hampshire field monitoring teams will be coordinated and dispatched from the IFO/EOF. The New Hampshire monitoring teams will report sample results to the IFO/EOF via radio and will receive instructions on additional monitoring to be performed. The procedures for the coordination of field monitoring and data collection are described in Secs. 7.0 & 9.0, Vol. 6. Sample media are returned to the IFO/EOF for screening, prioritization, and distribution to laboratories for further analysis.

**Plan Reference**

H.12. Vol. 1, Sec. 2.5.3; Vol. 6, Secs. 7.0 & 9.0.

**Evaluation**

H.12. Adequate.

**I. Accident Assessment (Planning Standard I):**

Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

**Evaluation**

I.7. Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility.

**Statement**

I.7. The Plan (Sec. 2.5.3, Vol. 1) describes the capabilities and resources for field monitoring within the plume EPZ.

The New Hampshire DPHS will mobilize a minimum of three two-person field teams per shift to conduct field radiological monitoring. Field teams will be assembled at the DPHS facility in Concord and will proceed to the IFO/EOF. The field teams will be directed by the IFO/EOF in Newington. Monitoring teams will be equipped with all required equipment as listed in App. D of Vol. 9.

Although field radiological monitoring is a State responsibility, there are provisions in the plan for acquiring supplementary field monitoring data from the local response organizations. As indicated in Sec. 2.8 of Vol. 20, DPHS may call upon town emergency personnel to take background readings in the immediate area of the local EOC using available equipment.

**Plan Reference**

I.7. Vol. 1, Sec. 2.5.3; Vol. 9, App. D; Vol. 20, Sec. 2.8.

**Evaluation**

I.7. Adequate.

**Evaluation Criterion**

I.8. Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment and



estimated deployment times.

#### Statement

- I.8. The Plan (Sec. 2.5.3, Vol. 1) describes the methods, equipment, and expertise to make rapid assessments of actual or potential magnitude and locations of radiological hazards.

The New Hampshire DPHS has made provisions to mobilize a minimum of three two-person field teams to conduct field radiological monitoring. Field teams will be assembled at the DPHS facility in Concord and proceed to the IFO/EOF in Newington. Field team procedures (Sec. 10.0 of Vol. 6 & Sec. 3 of Vol. 8) call for field team members to pick up vehicles with dual radio capability (UHF and VHF) in Concord. Travel time is estimated at one and one-half hours. Monitoring teams will be equipped with all required equipment as listed in App. D of Vol. 9.

After being dispatched from the IFO/EOF, the field monitoring teams will proceed to monitoring points as directed by the IFO/EOF within the plume exposure EPZ. At monitoring points the team will measure whole body dose rate, will take air samples, and will determine airborne radioiodines at levels less than 10 microcuries per cubic centimeter above typical background levels. The monitoring teams will report the sample results to the accident assessment staff by radio and will receive instructions for the next monitoring location. Any liquid spills in the waters near the Seabrook Station will be monitored by the collection of water samples as needed.

#### Plan Reference

- I.8. Vol. 1, Sec. 2.5.3; Vol. 6, Sec. 10.0; Vol. 8, Sec. 3; Vol. 9, App. D.

#### Evaluation

- I.8. Adequate.

#### Evaluation Criterion

- I.9. Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10<sup>-7</sup> microcuries per cubic centimeter under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

**Statement**

- I.9. The Plan (Sec. 2.5.3, Vol. 1) describes the capabilities to detect and measure radioiodine concentrations in air in the plume EPZ. The State has made provisions for the use of the E-140 to determine airborne radioiodines at levels less than  $10^{-7}$  microcuries per cubic centimeter above typical background levels. The procedures in Sec. 3 of Vol. 8 indicate the method of converting field readings to iodine concentrations, and instructions for expediting delivery of field samples for further laboratory analysis. The Monitoring Team Coordinator check list (Sec. 9.0 of Vol. 6) informs the Monitoring Team Coordinator to instruct DPHS monitoring teams to expedite delivery of air samples to the IFO/EOF if a reading of 100 cpm above background is detected.

**Plan Reference**

- I.9. Vol. 1, Sec. 2.5.3; Vol. 6, Sec. 9; Vol. 8, Sec. 3.

**Evaluation**

- I.9. Adequate.

**Evaluation Criterion**

- I.10. Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18 of NUREG 0654, FEMA-REP-1, Rev. 1) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.

**Statement**

- I.10. The Plan (Secs. 2.5.3 and 2.6, Vol. 1) describes the provisions for relating field measurements to projected dose rates and for comparison of dose rates with protective action guides (PAGs). The procedures (Sec. 7.0 of Vol. 6 and Sec. 6 of Vol. 8) for the DPHS IFO/EOF Accident Assessment Team indicate that, in conjunction with Utility Accident Assessment, the Accident Assessment Team is to perform atmospheric dispersion estimation and dose rate estimation using METPAC. The type of information that can be obtained from the METPAC printout includes plume arrival time for downwind distances up to 10 miles, whole-body and

thyroid dose rate projections, atmospheric dispersion and plume depletion factors, and whole body and thyroid integrated doses for 2, 4, 6, or 8 hours of exposure. FEMA notes that DPHS will staff an accident assessment function (Sec. 8 of Vol. 6) at the State EOC. The EOC METPAC Operator will perform accident assessment functions until the IFO/EOF Accident Assessment Team is operational. At that time, the EOC METPAC Operator will provide a backup to the IFO/EOF Accident Assessment Team and will provide a check for accident assessment activities at the IFO/EOF.

Field radiological measurements will be used to prepare dose estimates and projections for subsequent comparisons to dose projections derived from the METPAC. The procedure (Sec. 4.0 of Vol. 8) for conversion of field radioiodine count rates to child thyroid dose commitment specifies a process to reduce undue conservatism in order to calculate accurate dose commitments. PARs will be developed as described in Sec. 6.0 of Vol. 8. Forms 210 A & B (Forms Sec., Vol. 8) have been developed to document the PARs.

See J.11 for discussion of dose projections for the ingestion pathway.

**Plan Reference**

- I.10 Vol. 1, Secs. 2.5.3 & 2.6; Vol. 6, Secs. 7.0 & 8.0; Vol. 8, Secs. 4.0, 6.0, & Forms.

**Evaluation**

- I.10. Adequate.

**Evaluation Criterion**

- I.11. Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.

**Statement**

- I.11. The Plan (Sec. 2.5.3, Vol. 1) indicates that, if necessary, aerial monitoring will be performed by DPHS monitoring personnel with National Guard (if available) or Civil Air Patrol aircraft. DPHS may use Federal resources if the FRMAP has been invoked prior to the need for aerial monitoring and if the resources are readily available. Procedures for aerial monitoring are described in Sec. 3.0 of Vol. 8.



**Plan Reference**

I.11 Vol. 1, Sec. 2.5.3; Vol. 8, Sec. 3.0.

**Evaluation**

I.11. Adequate.

**J. Protective Response (Planning Standard J):**

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

**Evaluation Criterion**

- J.2. Each licensee shall make provision for evacuation routes and transportation for on-site individuals to some suitable off-site location, including alternatives for inclement weather, high traffic density and specific radiological conditions.

**Statement**

- J.2. The Plan does not describe any special provisions for the evacuation of Seabrook Station workers. The Seabrook Station Evacuation Time Study indicates that the State's evacuation plan for the general public includes an estimate of vehicles that could come from Seabrook Station. During normal operations, evacuation of non-assigned station personnel would involve approximately 500 vehicles.

**Plan Reference**

- J.2. Vol. 1, Sec. 2.6; Vol. 20, Sec. 2.11; Seabrook Station Evacuation Time Study.

**Evaluation**

- J.2. Adequate.

**Evaluation Criterion**

- J.9. Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria. This shall be consistent with the recommendations of EPA regarding exposure resulting from passage of radioactive airborne plumes (EPA-520/1-75-001), and with those of DHEW (DHHS)/FDA regarding radioactive contamination of human food and animal feeds as published in the Federal Register of October 22, 1982 (47 FR 47073).

**Statement**

J.9 The Plan (App. C, Vol. 9) describes the New Hampshire communities within the Seabrook Station plume exposure EPZ as being within Rockingham County, New Hampshire. All land area is said to be under the jurisdiction of the following communities: Brentwood, East Kingston, Exeter, Greenland, Hampton, Hampton Falls, Kensington, Kingston, New Castle, Newfields, Newton, North Hampton, Portsmouth, Rye, Seabrook, South Hampton, and Stratham. The navigable waters of the Atlantic Ocean are under the jurisdiction of the USCG. See Figure 1 on page xvii.

The State of New Hampshire has grouped the identified communities into Emergency Response Planning Areas (ERPAs). ERPAs are groupings of municipalities that are identified on the basis of distance and direction from the SNPS and for which specific evacuation time estimates have been assigned.

Following (source is Table C1.1-1 in Vol. 9) is the identification title (ERPA name) and grouping of municipalities:

ERPA Groupings of Municipalities

- A Hampton Falls, Seabrook, Hampton Beach
- C Kensington, South Hampton
- D Hampton, North Hampton
- F Brentwood, East Kingston, Exeter, Kingston, Newfields, Newton
- G Greenland, New Castle, Portsmouth, Rye, Stratham

FEMA notes that ERPA designations ERPA B and ERPA E have been assigned to groupings of municipalities in the Massachusetts portion of the Seabrook Station plume exposure EPZ.

The general population, projected to 1990 (source is Figure 6.5-1 of Sec. 6, Vol. 8), is stated to be as follows:

<u>ERPA</u>	<u>Permanent</u>	<u>Summer Peak</u>
A	9,442	46,284
C	2,439	3,286
D	15,865	29,782
F	26,060	28,399
G	40,651	53,114
Total		
Population	94,457	160,865

The transient population mainly visits Seabrook and Hampton Falls, and Seabrook and Hampton beaches (ERPA A); Hampton and North Hampton (ERPA D); the beaches in Rye (ERPA G), and the community of Portsmouth (ERPA G). The Seabrook Station Ingestion Exposure EPZ affects



portions of the States of Maine and New Hampshire and portions of the Commonwealth of Massachusetts.

The Plan (Figure C1.1-2, Vol. 9) identifies all or portions of the following New Hampshire counties as being part of the ingestion exposure EPZ: Rockingham, Hillsborough, Merrimac, Belknap, Strafford, and Carroll. See Figure 2 on page xviii.

The State of New Hampshire has adopted the concept of operation for Protective Actions (Sec. 2.6, Vol. 1) in the plume exposure EPZ as follows:

- New Hampshire will rely upon a combination of precautionary and protective actions.
- Precautionary actions include actions such as school cancellation or early school evacuation, closure or evacuation of certain beaches between May 15 and September 15, and the establishment of a Water (Marine) Safety Zone by the USCG.

Plant Status and prognosis are the basis for precautionary actions for seasonal beach populations, school children, and boaters.

At ALERT ECL, if plant prognosis warrants, the beaches in Hampton and Seabrook will be closed and access control will be established.

At SAE ECL, if plant status is stable, the beaches in Hampton and Seabrook will be closed and access control will be established.

At SAE ECL, if plant status indicates that a major plant system is unstable or degrading, the beaches in Hampton and Seabrook will be evacuated, access control will be established, and a marine safety zone will be established.

At SAE ECL, a decision will be made on precautionary actions for schools: cancellation if schools are not in session; early evacuation of schools if schools are in session; and cancellation of extracurricular school activities.

- Protective actions include sheltering and/or evacuation coupled with traffic and access control. Plant status and prognosis are the initial basis for protective actions for the general public.

At GE ECL, a decision will be made to evacuate Hampton Falls and Seabrook including Hampton and Seabrook beaches (ERPA A), establish access control, and establish a marine safety zone.

Based upon assessment of plant conditions, a decision to extend protective actions to other ERPAs will be made. The State of New Hampshire will utilize dose projections to confirm the adequacy of protective action decisions based upon assessment of plant status and prognosis, as described in Sec. 2.6.7 of Vol. 1 and Sec. 6 of Vol. 8.

The protective action recommendation will be conveyed to the public on a community basis. Institutionalized populations (including those in hospitals, nursing homes and jails) will be considered as part of the general public. If the protective actions for the general public cannot be implemented for these populations, a more detailed evaluation of protective action recommendations is undertaken based upon facility-specific sheltering protection factors.

The State of New Hampshire has established the capabilities for effecting the evacuation of the general public and special populations. The State of New Hampshire has designated staff, equipment, and resources to effect evacuation and to establish access control points (ACPs) for evacuated areas. The State of New Hampshire will provide dosimetry and KI, if appropriate, to those Special Populations who cannot evacuate.

The State has designated evacuation routes to be used in the plume exposure EPZ. The evacuation routes for the Seabrook Station EPZ are shown in Fig. 2.6-2 of Sec. 2.6 in Vol. 1. The evacuation routes are described in App. C, Table C.1.1-4 of Vol. 9. Traffic and access control points (Figure C1.1-10 in Vol. 9) will expedite traffic flow during the implementation of an evacuation. If necessary, an evacuation can be implemented during adverse weather. Access control, which will be implemented by the New Hampshire State Police and by local police, will be established during a sheltering or evacuation protective action. The communities within the Plume Exposure EPZ have equipment for dealing with snow removal and route maintenance (Sec. 2.6 of Vol. 1). The State has provided several means for supplementing local route maintenance capabilities (dealing with impediments) should these become desirable (e.g., New Hampshire Department of Transportation and New Hampshire National Guard personnel and equipment).

The primary means of transportation for evacuation of the general public will be privately-owned vehicles. Each community has an individual designated with the responsibility of assessing the needs and providing transportation assistance, if required, to the special populations. Special populations are defined as schools (public and private), day care centers, nursing homes, hospitals, other special facilities, and residents who



are transit-dependent or who require special help. Special arrangements have been planned to provide for the transport of these special populations. The provision of transportation resources for people not able to use private automobiles will be coordinated by the State of New Hampshire. If a local community does not have the capability to respond to the emergency, the State will assume the responsibility for providing assistance to special populations.

The State of New Hampshire has made arrangements to evacuate the transit-dependent persons in the beach areas within about 2 miles of Seabrook Station during the period from May 15 to September 15 of every year. The State recognizes that the possibility exists that some transient population on the beaches may not have access to a source of transportation. In the event that evacuation is recommended for the beach population, the transportation-dependent transients will be accommodated in temporary public shelters located in the beach areas until State-provided transportation resources arrive. The State has made provision for sheltering and subsequent evacuation of the transit-dependent beach population as follows: prescribed EBS messages that will direct transportation-dependent beach population to shelters; buildings identified as shelters; and the provision of transportation resources to evacuate transients to the designated reception centers.

The State of New Hampshire employs the "Shelter-in-Place" concept. This concept provides for sheltering at the location in which the sheltering instruction is received. Those at home are to shelter at home; those at work or school are to be sheltered in the workplace or school building. Transients located indoors or in private homes will be asked to shelter at the locations they are visiting if this is feasible. Transients without access to an indoor location will be advised to evacuate as quickly as possible in their own vehicles. If necessary, transients without transportation will be advised to shelter in nearby public buildings.

The State has established the capability to alert and notify the public. The Plan (Sec. 2.1.4, Vol. 1) describes the New Hampshire Public Alerting System. This system consists of 94 sirens and designated EBS stations. The State will coordinate the activation of the sirens and the designated EBS radio station. FEMA notes that the New Hampshire Public Alerting System is operational at this time.

The State of New Hampshire has adopted the concept of operation for PAs (Sec. 2.6.6 of Vol. 1) in the ingestion exposure EPZ as follows:



- **Precautionary guidance:** Recommend that milk animals be placed on stored feed.
- **Preventive Protective Actions:** Recommend PAs if the measured contamination of foodstuffs exceeds the preventive derived response levels.
- **Emergency Protective Actions:** Recommend PAs if the measured contamination of foodstuff exceeds the emergency derived response levels.

The State of New Hampshire has adopted the concept of operation for PAs (Sec. 2.9, Vol. 1) for the Reentry and Recovery Period as follows: recommend the designation of restricted zones, relocation of the general public, and decontamination campaigns. These Protective Actions will be based on the measurement of contamination that would result in projected whole body doses exceeding the various relocation PAGs.

The State of New Hampshire has adopted the EPA PAGs for the general public and emergency workers in the plume exposure EPZ (Sec. 2.6.3, Vol. 1). The State of New Hampshire has adopted the FDA PAGs for foodstuffs in the ingestion exposure EPZ (Sec. 2.6.4, Vol. 1). The State of New Hampshire has adopted the draft EPA PAGs for relocation (Sec. 2.9 of Vol. 1). The State of New Hampshire PAGs are consistent with the New Hampshire Yankee Offsite Response Organization, and the State of Maine.

#### Plan Reference

- J.9. Vol. 1, Secs. 2.1.4, 2.6, 2.9, Figure 2.6.2; Vol. 8, Sec. 6, Figure 6.5-1; Vol. 9, App. C, Table C1.1-1 & C1.1-4, Figures C1.1-2 & C1.1-10.

#### Evaluation

- J.9. Adequate.

#### Evaluation Criterion

- J.10. The organization's plans to implement protective measures for the plume exposure pathway shall include:
- J.10.a. Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan).

**Statement**

J.10.a. Several types of maps are provided in various sections of the State and local plans. These maps are as follows:

<u>Location</u>	<u>Type</u>
• Vol. 1, Fig. 2.5-2	Grid Map (for Off-Site Radiological Monitoring)
• Vol. 1, Fig. 2.6-2	Evacuation Routes & Reception Centers
• Vol. 9, App. C Figure C1.1-1 Figure C1.1-2 Figure C1.1-3	Plume Exposure EPZ; Ingestion Pathway EPZ; and Emergency Response Planning Areas.
• Vol. 20, Figure 1.5-1 Figure 1.5-2	Plume Exposure EPZ Emergency Response Planning Areas
• Vols. 38-41, Figure 2.4-1	Reception Centers and Mass Care Shelters Locations.
• Traffic Management Manual	Access/Traffic Control Points.

**Plan Reference**

J.10.a. Vol. 1, Sec. 2.5, Figure 2.5-2 and Sec. 2.6, Figure 2-6-2; Vol. 9, App. C, Figures C1.1-1, C1.1-2, & C1.1-3; Vol. 20, Sec. 1, Figures 1.5-1 & 1.5-2; Vols. 38-41, Figure 2.4-1; Traffic Management Manual.

**Evaluation**

J.10.a. Adequate.

**Evaluation Criterion**

J.10.b. Maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format).

**Statement**

J.10.b. Population distribution by ERPA is provided in map form in Vol. 8, Figure 6.5-1 and in table form in Table 1.5-1 in Vol. 20.

**Plan Reference**

J.10.b. Vol. 8, Sec. 6, Figure 6.5-1; Vol. 20, Sec. 1, Table 1.5-1.

**Evaluation**

J.10.b. Adequate.

**Evaluation Criterion**

J.10.c. Means for notifying all segments of the transient and resident population.

**Statement**

J.10.c. The Plan in Sec. 2.1 of Vol. 1 and in Sec. 2.5 of Vol. 20 describes the means for notifying all segments of the transient and resident population. See comments under E6.

**Plan Reference**

J.10.c. Vol.1, Sec. 2.1; Vol. 20, Sec. 2.5.

**Evaluation**

J.10.c. Adequate.

**Evaluation Criterion**

J.10.d. Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

**Statement**

J.10.d. The Plan in Sec. 2.6 of Vol. 1 and Sec. 2.11 of Vol. 20 describes the means for protecting those persons whose mobility may be impaired. See discussions and comments under J.10.g on the provision of transportation assistance to transit-dependent persons.

Each community has an individual designated with the responsibility of assessing the needs for and providing transportation assistance, if required, to special populations. At SAE or GE, the communities (or the State for the communities) will contact the special



populations. The special populations will be advised of the emergency conditions at Seabrook. The community (or State) will confirm the transportation requirements necessary to effect evacuation. If evacuation is implemented, the special facility populations will be advised of the number of vehicles being sent and the ETA (estimated time of arrival). In those cases in which a community is unable to respond to an emergency, the State Plan in Sec. 1.2.6 of Vol. 1 discusses the provisions for identifying transportation resource needs (including receiving requests for assistance during the emergency) and for obtaining and supplying the required resources.

The provision of the transportation resources will be coordinated by the State. The State will direct the dispatch of vehicles to the Local Staging Areas where they will be provided maps and directions to the facilities. Any additional unanticipated vehicle needs will be coordinated through the NHOEM Liaison at the IFO/EOF and the State Transportation Staging Area. The detailed procedures have been incorporated into Vol. 5, Secs. 14.0 & 15.0 and in Vols. 21-37, Sec. 3. All transportation needs and resources are coordinated by NHOEM at the IFO/EOF in Newington. Transportation requirements are transmitted from the communities to the IFO Local Liaisons. The IFO Local Liaisons then provide the information to the IFO Resources Coordinator who, in turn, requests the resources from the EOC Resources Coordinator at the State EOC in Concord. In addition, one representative of the State's Bureau of Emergency Medical Services (EMS) will also be located at the State EOC and will be prepared to respond to requests for transportation assistance from special facilities.

Special arrangements have been planned for the transport of special populations as follows:

Schools - In the event an evacuation is initiated during school hours, New Hampshire children will be bused directly to Reception Centers. The provision of the transportation resources will be coordinated by the State.

Special Facilities - In the event an evacuation is recommended, Special facilities (nursing homes and hospitals) will be evacuated from the area to designated host facilities.

Special Needs Population - The number of persons requiring transportation support in each community of the Seabrook plume EPZ during an emergency are identified annually in a special needs population survey conducted by NHOEM. The individual in each community, who is responsible for overall transportation requirements (e.g., Transportation Coordinator) maintains a

current listing of community residents who require evacuation by either special vehicle (i.e., ambulance or special van) or that require physical help to evacuate. The Transportation Coordinator (or responsible town official) is responsible for identifying the transportation requirements of special needs persons. This includes those individuals previously identified and listed on the Special Needs List and also any individuals who telephone the EOC requesting transportation assistance.

The Plan does contain a consolidated listing (Sec. NHOEM, page 48, Emergency Phone Listing) of transportation needs which is as follows: 528 buses, 25 special needs buses, 41 vans, 14 reclining seat coaches, 26 ambulances, and 15 wheel chair vans are required. Individual lists of transportation needs are found in each community's section of the Emergency Phone Listing.

#### **Plan Reference**

J.10.d. Vol. 1, Secs. 1.2.6 & 2.6; Vol. 5, Secs. 14.0 & 15.0; Vol. 20, Sec. 2.11; Vols. 21-37, Sec. 3:

#### **Evaluation**

J.10.d. Adequate.

The State conducted a special needs survey in 1986. The State conducted two special needs surveys in 1989. The State distributed the revised special needs list to the participating governments in January 1990.

FEMA's review of the Letters of Agreement (Vol. 50) indicates that adequate resources are available.

#### **Evaluation Criterion**

J.10.e. Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.

#### **Statement**

J.10.e. The Plan (Sec. 2.6 and Sec. 2.7, Vol. 1 and Sec. 2.10, Vol. 20) describes the provisions for the use of radioprotective drugs, potassium iodide (KI), by emergency workers and institutionalized persons.



KI is stored at the following State and local emergency facilities (see App. D1.1.5 & D1.1.6 in Vol. 9):

- EPZ community local EOCs
- Hospitals and Nursing Homes
- State Transportation Staging Areas
- State Police Troop "A" Headquarters
- Dept. of Transportation field facilities
- IFO/EOF
- Reception Centers
- Rockingham County Jail

The KI supplies at each of the above facilities are inspected on a quarterly basis and any KI that has exceeded or will exceed the shelf life prior to the next scheduled inventory will be replaced (Sec. 2.4.5 of Vol. 1). At the local level, the RADEF Officer will perform this inventory and will return outdated KI to the NHOEM (Sec. 3.4 of Vol. 20). At the State and local dosimetry issuance points, all emergency workers receive a Potassium Iodide Acknowledgment Form which they are required to sign.

The KI will be made available to be ingested by all staff and by confined individuals only after instruction to do so by DPHS. Ingestion by hospital patients and residents of nursing homes will only be allowed if the individual's physician has determined that the use of KI is appropriate for the individual. Such determination may be made in advance and noted in the individual's medical records.

#### Plan Reference

J.10.e. Vol. 1, Secs. 2.4.5, 2.6, and 2.7; Vol. 9, App. D1.1.5 & D1.1.6; Vol. 20, Secs. 2.10 and 3.4.

#### Evaluation

J.10.e. Adequate.

#### Evaluation Criterion

J.10.f. State and local organizations' plans should include the methods by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the predetermined conditions under which such drugs may be used by off-site emergency workers.



**Statement**

J.10.f. The Plan in Sec. 2.7 of Vol. 1 and Sec. 2.10 of Vol. 20 describes the methods and decision process for administering KI to emergency workers and institutionalized individuals who can not evacuate.

For emergency workers, KI will be distributed at the time dosimetry is issued. If the power plant has released I-131, and if projected doses are expected to exceed the upper range of the general population PAG for thyroid exposure (25 rem), the use of KI for emergency workers will be considered. The Director, DPHS, has the responsibility for authorizing emergency workers to begin taking KI. Sec. 4.1, Vol. 8, provides guidance and instruction for the authorization and administration of KI.

In regard to institutionalized individuals, KI is predistributed to the institutions so that it will be available in the event of a radiological emergency. Institutionalized individuals are individuals who are patients in hospitals, residents in a nursing home licensed as such by the Division of Public Health Services, individuals who are confined in a house of correction, or who are staff employed by the hospital, nursing home or house of correction and whose presence in the facility is unavoidable during a radiological emergency.

According to the New Hampshire Division of Public Health Services KI Policy Letter dated April 24, 1986 (see Vol. 50, Sec. 2.0-1), KI will not be provided by DPHS to the general public. As indicated in this policy letter, and in the Plan, ingestion of the KI will only be done upon the authorization of the DPHS Director.

**Plan Reference**

J.10.f. Vol. 1, Sec. 2.7; Vol. 8, Sec. 4.1; Vol. 20, Sec. 2.10;  
Vol. 50, Sec. 2.0-1.

**Evaluation**

J.10.f. Adequate.

**Evaluation Criterion**

J.10.g. Means of relocation.

**Statement**

J.10.g. The Plan in Sec. 2.6 of Vol. 1 and Sec. 2.11 of Vol. 20 describes means for the relocation of the general public including persons who are transit dependent. See discussion and comments on the provision of transportation assistance for special populations under J.10.d.

The primary means of transportation for the general public will be privately-owned vehicles. The Plan assumes that residents requiring transportation, including non-automobile owning individuals and persons without access to their vehicles, will leave the EPZ in automobiles of friends, neighbors, or relatives. However, for those who require transportation assistance, the State will provide buses that will drive along predesignated routes for the pickup of residents.

In the event of an evacuation, the State EOC Resources Coordinator will direct the dispatch of the buses from the State Staging Areas to the Local Staging Areas. At the Local Staging Areas, the buses will be provided with route maps and directions for driving along the predesignated routes. Some towns have predesignated pickup points within the town (e.g., Exeter). Designated bus routes are outlined in the Emergency Plan Information Calendar that is provided to all plume EPZ residents. EBS messages will direct residents requiring transportation to report to the nearest bus route location for pickup. Residents who are provided transportation assistance will be evacuated to the predesignated Reception Centers. The responsibilities of the New Hampshire DOT and the National Guard have been expanded to include the role of providing an additional pool of vehicle drivers, if needed, to support an evacuation.

The State of New Hampshire has made arrangements to evacuate the transit-dependent persons present in the beach areas within about 2 miles of Seabrook Station (beaches in Hampton and Seabrook). The State recognizes that the possibility exists that some transient-dependent population on the beaches may not have access to a source of transportation. In the event that evacuation is recommended for the beach population, the transportation-dependent transients will be accommodated in temporary public shelters located in the beach areas until State-provided transportation resources arrive. The State has made provision for sheltering (NHOEM Sec., page 47 of 48, Emergency Phone Listing) and subsequent evacuation of the transit-dependent beach population as follows: prescribed EBS messages that will direct transportation-dependent beach population to shelters; buildings identified as shelters; and the provision of



transportation resources to evacuate transients to the designated reception centers.

The Plan does contain a consolidated listing (Sec. NHOEM, page 48, Emergency Phone Listing) of transportation needs which is as follows: 528 buses, 25 special needs buses, 41 vans, 14 reclining seat coaches, 26 ambulances, and 15 wheel chair vans are required. Individual lists of transportation needs are found in each community's section of the Emergency Phone Listing.

#### Plan Reference

J.10.g. Vol. 1, Sec. 2.6; Vol. 20, Sec. 2.11; Vol. 50; Emergency Phone Listing.

#### Evaluation

J.10.g. Adequate.

FEMA's review of the Letters of Agreement (Vol. 50) indicates that adequate resources are available.

#### Evaluation Criterion

J.10.h. Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone (see J.12).

#### Statement

J.10.h. The Plan in Sec. 2.6 of Vol. 1 and Sec. 2.11 of Vol. 20 describes the provisions for relocation centers (reception centers) and congregate care centers. See discussion under J.12.

Four reception centers are located in the host communities of Dover, Manchester, Salem, and Rochester. The specific locations within these communities are listed on Table 2.4-1 and are shown on Fig. 2.4-1 of Vols. 38-41. All four reception centers are located more than five miles beyond the outer boundary of the 10 mile plume exposure EPZ.

Reception center operation is described in each of the host community plans (Vols. 38-41, Sec. 2.4). The New Hampshire Division of Human Services (DHS) will provide personnel to manage the reception centers (Sec. 5, Vol. 7). The New Hampshire DPHS will supervise radiological monitoring and decontamination services which will be carried out by local staff (Sec. 5, Vol. 8).

Congregate care will not be provided at the reception center itself, but will be provided at nearby mass care



shelters in the host communities. According to the host community plans (Vols. 38-41, Sec. 2.4), 42 congregate care centers (mass care shelters) have been identified. The identified congregate care centers have space for approximately 35,430 people. The American Red Cross will staff and manage the mass care shelters.

**Plan Reference**

J.10.h. Vol. 1, Sec. 2.6; Vol. 7, Sec. 5; Vol. 8, Sec. 5; Vol. 20, Sec. 2.11; Vols. 38-41, Sec. 2.4, Table 2.4-1, Figure 2.4-1.

**Evaluation**

J.10.h. Adequate.

**Evaluation Criterion**

J.10.i. Projected traffic capacities of evacuation routes under emergency conditions.

**Statement**

J.10.i. The Seabrook Station Evacuation Time Study provided projected traffic capacities of the evacuation routes. The capacities of each route segment are tabulated in Sec. 3. Reductions in the capacities due to rain (20%) and snow (25%) are presented. According to the Seabrook Station Evacuation Time Study, the highway system in the Seabrook evacuation area consists primarily of the following three categories of route segments:

- Two-lane roads;
- Multi-lane expressways; and
- Freeway ramps.

**Plan Reference**

J.10.i. Seabrook Station Evacuation Time Study.

**Evaluation**

J.10.i. Adequate.

**Evaluation Criterion**

J.10.j. Control of access to evacuated areas and organization responsibilities for such control.

**Statement**

J.10.j. The Plan in Sec. 2.6 of Vol. 1, Sec. 2.11 of Vol. 20, and in the Traffic Management Manual, describes the means to establish access control during a radiological emergency.

Access and traffic control within the State of New Hampshire will be implemented by local police and the New Hampshire State Police. The preselected access control points (ACPs) and traffic control points (TCPs) are described in the New Hampshire Traffic Management Manual. Access control instructions and traffic control instructions are provided in the Traffic Management Manual, which contains a listing and sketches of the ACPs. The Traffic Management Manual indicates that sufficient cones exist to equip all ACP/TCPs.

When an area has been evacuated, it is considered to be an Exclusion Area from which both transients and residents are restricted. The following categories of people may be allowed temporary access to the Exclusion Area:

- Farm owners and/or employees with livestock and associated farm care responsibilities.
- Owners, Managers and selected employees of commercial establishments with responsibilities for the security and preservation of equipment and products threatened by an evacuation.

In addition to access control of automobiles on the highways, additional access control measures are presented in the Plan. As stated in Sec. 7 of Vol. 5, the NHOEM Agency Liaison Officer will advise the Boston and Maine Railroad Chief Dispatcher to prepare to stop train traffic from entering the EPZ if protective actions are recommended. The EOC Operations Officer will coordinate the establishment of a marine safety zone with the Coast Guard (Sec. 5, Vol. 5). As indicated in Sec. 17 of Vol. 7 and Sec. 1.4 of Vol. 1, the U.S. Coast Guard will restrict boats (5- or 10-mile marine safety zone) from the Plume EPZ and the Federal Aviation Administration may declare the plume EPZ a restricted flight zone.

**Plan Reference**

J.10.j. Vol. 1, Secs. 1.4.5 and 2.6; Vol. 5, Secs. 5 & 7; Vol. 7, Sec. 17; Vol. 20, Sec. 2.11; Traffic Management Manual.



**Evaluation**

J.10.j Adequate.

**Evaluation Criterion**

J.10.k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.

**Statement**

J.10.k. The Plan (Sec. 2.6, Vol. 1 and in Sec. 2.11, Vol. 20) describes the means and process for dealing with potential impediments to the use of evacuation routes, such as those caused by bad winter weather and/or stalled or abandoned vehicles.

The communities within the plume exposure EPZ (Sec. 3 of Vol. 21-37) have ample equipment and road crews for dealing with snow removal and traffic impediments since this is a normal function of local communities in New Hampshire.

In addition, the State has provided other means for supplementing local route maintenance capabilities if needed. The New Hampshire Department of Transportation is prepared to use its maintenance equipment, including plows and trucks, and towing equipment to maintain these routes during adverse weather and any unforeseen impediments (stalled or abandoned vehicles) to evacuation occur. This equipment can be made available within a few hours of receiving requests for support. Should even more support be required, New Hampshire National Guard equipment and personnel may be used as a backup. Activation times for this backup resource would be considerably longer. It would likely take between two and twelve hours to mobilize and dispatch National Guard Resources. These State and local resources may also be used to remove impediments to evacuation, such as stalled vehicles. If needed, private tow vehicles can be requested through and coordinated by State Police Troop A (State Police Section, Emergency Phone Listing and Vol. 50).

**Plan Reference**

J.10.k. Vol. 1, Sec. 2.6; Vol. 8; Vol. 20, Sec. 2.11; Vols. 21-37, Sec. 3; Vol. 50; Emergency Phone Listing.

**Evaluation**

J.10.k. Adequate.



**Evaluation Criterion**

J.10.1. Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (see App. 4).

**Statement**

J.10.1. The Plan (Sec. 6, Vol. 8) contains time estimates for evacuation of the various planning areas. Evacuation time estimates were calculated for the designated ERPAs. The overall evacuation time estimates include the evacuation time estimates for persons at the beaches, for transit-dependent persons, and for special facility populations. Sec. 2.6 of Vol. 1 indicates that the source of the evacuation times was the Seabrook Station Evacuation Time Study.

Sec. 2.11-4 of Volume 20 assigns priorities for evacuating (providing transportation assistance) to special facility populations and transit-dependent persons. Transportation assistance will be provided to special populations by community according to the proximity to Seabrook Station in the following order of priority: for public schools; private schools including day care centers; the beach transit-dependent transients (during May 15 to September 15); hospitals and nursing homes; residents requiring transportation assistance (transit-dependent persons); and the special needs persons.

Sec. 8 of Vol. 5 states that the EOC Resources Coordinator will cause the dispatch of transportation resources to the towns designated for the implementation of protective actions. The Rockingham County's procedure for local staging areas (Sec. 14.5 of Vol. 7) and the Transportation Coordinator's portion of Sec. 3 (Vols. 21-37) indicates that the local governments will dispatch transportation resources in the order of priority that is discussed above.

**Plan Reference**

J.10.1. Vol. 1, Sec. 2.6; Vol. 8, Sec. 6.

**Evaluation**

J.10.1. Adequate.

**Evaluation Criterion**

J.10.m. The basis for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.

**Statement**

J.10.m. The Plan in Sec. 2.6 of Vol. 1 and in Sec. 6 of Vol. 8 describes the basis for the determination of specific protective action recommendations (PARs) for the plume exposure pathway. The Protective Action Decision Criteria is the process for developing PARs (Vol. 8, Sec. 6).

The PAR process (Protective Action Decision Criteria) is based upon both plant status and dose projections, as appropriate. Field measurements are incorporated as they become available in order to refine PARs. The EPA Protective Action Guides are used as a basis for selecting protective actions for the plume exposure pathway. The METPAC program used for dose projection contains shelter protection factors for a woodframe house without a basement, used in both whole-body and thyroid dose calculation.

**Plan Reference**

J.10.m. Vol. 1, Sec. 2.6; Vol. 8, Sec. 6.

**Evaluation**

J.10.m. Adequate.

**Evaluation Criterion**

J.1. Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated foodstuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation. Maps for recording survey and monitoring data, key land use data (e.g., farming), dairies, food processing plants, water sheds, water



supply intake and treatment plants and reservoirs shall be maintained. Provisions for maps showing detailed crop information may be by including reference to their availability and location and a plan for their use. The map shall start at the facility and include all of the 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process milk products and other large amounts of food or agricultural products originating in the ingestion pathway Emergency Planning Zone, but located elsewhere, shall be maintained.

### Statement

- J.11. The Plan in Sec. 2.6 of Vol. 1 describes the protective measures to be used for the ingestion pathway.

The State of New Hampshire has adopted the concept of operation for PAs in the ingestion exposure EPZ as follows:

- **Precautionary guidance:** recommend that milk animals be placed on stored feed and in shelters.
- **Preventive Protective Action:** recommend PAs if the measured contamination of foodstuffs exceeds the preventive derived response levels
- **Emergency Protective Action:** recommend PAs if the measured contamination of foodstuff exceeds the emergency derived response levels.

Sec. 2.6.8 of Vol. 1 discusses the process for determining protective actions for the ingestion EPZ. Secs. 11 and 12 of Vol. 6 and Sec. 3 of Vol. 8 discuss the process for collecting ingestion pathway samples and for the analysis of these samples. Procedures have been developed for the collection of water, snow, milk, vegetation, meats and meat products, soil, food crops, animal feeds, and shellfish. Procedures have been developed for the analysis of sample media and for estimating the dose commitment consequences of uncontrolled ingestion. App. E of Vol. 9 specifies the process for determining protective actions for the ingestion EPZ.

Preventive Protective Actions for food control (e.g., field or orchard crops) require these foods to be stored until the radioactivity has decayed or been washed off. More extensive protective actions will be used only if the above measures are ineffective. Emergency Protective Actions will prevent food from entering the market place. DPHS will order, and the Department of Agriculture will implement, control of harvesting, sale of crops, and, if necessary, condemnation of



contaminated foods. These protective actions will be implemented by direct contact with the commercial procedures according to the plan. Lists of the commercial agricultural facilities in the ingestion pathway EPZ are maintained by the Department of Agriculture. The Plan also indicates that DPHS will order, and the Department of Fish and Game will implement, control of harvesting, sale, and if necessary, condemnation of all contaminated shellfish. These protective actions will be implemented by direct contact with the commercial fisheries and producers. Lists of all the commercial fisheries in the ingestion pathway EPZ are maintained by the Department of Fish and Game.

According to the Plan (Sec. 2.6.6 of Vol. 1), water control will focus on water supplies that receive a major portion of their water from surrounding watershed which may have become contaminated. The Plan indicates that, as necessary, DPHS will ask the New Hampshire Water Supply and Pollution Control Commission (WSPCC) to control the use of water from potentially contaminated public surface water supplies within the ingestion pathway EPZ. Public surface water supplies can be temporarily condemned until testing for radioactivity levels can be undertaken to confirm or refute the need for control. Condemnation of surface water supplies will be implemented by the WSPCC through direct contact with the water supply owner/operators. The WSPCC maintains a list of all public water supplies in New Hampshire.

Provisions have been made for maintaining maps for recording survey and monitoring data, and for monitoring key land use data, dairies, food processors, food distributors, water supplies, etc., at the EOF and at the State EOC. The sample collection teams have USGS maps for the ingestion exposure EPZ and maps for the plume exposure EPZ. A grid system is used for both maps.

#### Plan Reference

J.11. Vol. 1, Secs. 2.6; Vol. 6, Secs. 11 & 12; Vol. 8, Sec. 3; Vol. 9, App. E.

#### Evaluation

J.11. Adequate.

**Evaluation Criterion**

- J.12. Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

**Statement**

- J.12. The Plan in Secs. 2.6 & 2.7.5 of Vol. 1, in Sec. 2.11 of Vol. 20, and in Sec. 5 of Vol. 8 describes the means for registering and monitoring evacuees.

There are four reception centers for New Hampshire evacuees. These are located in the communities of Dover, Rochester, Manchester, and Salem (Vols. 38-41, Sec. 2.4 & 4.0). Each of these reception centers is designated as the host for evacuees from selected plume exposure EPZ communities.

The reception centers will be managed by personnel provided by the New Hampshire DHS. Registration may be handled directly by DHS staff or delegated to other available emergency response workers. Staffing functions and numbers of personnel for registration, message exchange, coordination of volunteers, information and recreation, student processing, etc., are described in Sec. 5 of Vol. 7 and in the DHS section of the Emergency Phone Listing.

Monitoring and decontamination will be supervised by DPHS staff and will be performed by local staff. Details of the registering, monitoring and decontamination are further provided in DPHS procedures (Vol. 8, Sec. 5). Staffing functions and numbers of required personnel for monitoring and decontamination are described in Sec. 5 of Vol. 8.

The basis for establishing the staffing levels is also described in Sec. 5 of Vol. 8. The total number of evacuee arrivals at each reception center was estimated by first obtaining the sum of the summer weekend peak population for each EPZ community to be sent to a particular reception center. Then the population of special facilities and the number of those evacuees who are transit-dependent for each EPZ community were subtracted from the peak population totals. The remainder population was then multiplied by 20% in accordance with FEMA guidance. As a final step, 100% of the transit-dependent population was added to the total since all transit-dependent people would be transported directly to reception centers. On the basis of the above calculations, the number of evacuees expected at



the reception centers for registration and monitoring is 34,851 persons.

The average monitoring rate is stated as three minutes per person. Therefore, in 12 hours, each monitoring position can process 240 evacuees. The number of monitoring positions required is 146, based upon an expected 34,851 evacuees. According to the Plan, 184 monitoring positions are provided at the 4 primary facilities (46 per facility) and 24 monitoring positions are provided at the 4 back-up facilities (6 per facility) for a total of 208 monitoring positions. These numbers, 184 and 24, represent the monitoring positions assigned to Control Point Monitoring functions. There are monitoring positions assigned to other functions such as vehicle monitoring, decontamination, etc.

FEMA notes that the staff arrangements (Table 5.4-1 of Vol. 8 ) calls for an additional 15 monitors at each primary facility and an additional 4 monitors at each back-up facility. These monitors are provided for rotation break periods and are not included in the above discussion of 208 monitoring positions for control point monitoring functions.

Arrangements have been made for the special facility populations to be monitored and decontaminated, if necessary, at the host facilities (Vol. 8, Sec. 5, and Vol. 9, App. D and F).

#### Plan Reference

J.12. Vol. 1, Secs. 2.6 & 2.7.5; Vol. 7, Sec. 5; Vol. 8, Sec. 5 and Table 5.4-1; Vol. 9, Apps. D & F; Vol 20, App. 2.11; Vols. 38-41, Secs. 2.4 & 4.0.

#### Evaluation

J.12. Adequate.



**K. Radiological Exposure Control (Planning Standard K):**

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

**Evaluation Criterion**

K.3.a. Each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.

**Statement**

K.3.a. The Plan in Sec. 2.7 of Vol. 1, in Sec. 2.11 of Vol. 20, and in Sec. 4.0 of Vols. 38-41, describes the provisions for determining dose received by emergency workers and describes the availability, plans for distribution, and use of dosimetry by emergency workers. In addition to emergency workers, individuals receiving Exclusion Area passes will be issued dosimeters at the IFO/EOF.

Dosimetry and its use are described in Sec. 2.7.2, Vol. 1, and Sec. 10, Vol. 8. Three dosimeters will be provided to emergency workers in order to monitor and record the whole body gamma exposure of emergency workers. These include two self-reading "pocket-types", a CDV-138 (0-200 mR) and a CDV-730 (0-20R) or equivalents. The third is a thermo-luminescent permanent record dosimeter (TLD) which is used to measure the total exposure an emergency worker receives for the duration of the emergency. Emergency workers assigned life-saving missions in accordance with Sec. 8 of Vol. 8 will be issued a CDV-742 (0-200R).

The dosimeters are stored, along with other radiological monitoring equipment, at the facilities designated in App. D, Vol. 9. The Plan (Sec. 2.7, Vol. 1) indicates that NHOEM will be responsible for providing and maintaining an adequate supply of radiological equipment at each facility.

**Plan Reference**

K.3.a. Vol. 1, Sec. 2.7; Vol. 8, Secs. 8 & 10; Vol. 9, App. D; Vol. 20, Sec. 2.11; Vols. 38-41, Sec. 4.

**Evaluation**

K.3.a. Adequate.

**Evaluation Criterion**

K.3.b. Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.

**Statement**

K.3.b. The Plan in Sec. 2.7 of Vol. 1, in Sec. 2.10, of Vol. 20, and in Sec. 10 of Vol. 8 describes the process that instructs emergency workers to read their dosimeters at appropriate intervals, to record the readings, and to periodically report the readings to appropriate staff.

The process (described in Sec. 2.7.2 of Vol. 1) states that, after being issued dosimeters, personnel will read their self-reading dosimeters at 30-minute intervals. If releases of radioactive materials are expected or have occurred, each emergency worker will be instructed to take readings at 15-minute intervals. Emergency workers are to report readings to their respective supervisor at certain levels: i.e., 175mR, 1R, 2R, 3R, etc. Exposure records are to be maintained by the appropriate supervisor.

DPHS is responsible for emergency worker exposure records. Log Sheets will be maintained in each facility that issues dosimetry. A sample Dosimetry-KI Report Form can be found in the Forms section of Vol. 8. After the emergency has been terminated, all Personnel Exposure Records will be forwarded to the DPHS Radiological Exposure Clerk at the IFO/EOF for review and will be kept by DPHS as a permanent record.

**Plan Reference**

K.3.b. Vol. 1, Sec. 2.7; Vol. 8, Secs. 10 & Forms; Vol. 20, Sec. 2.10.

**Evaluation**

K.3.b. Adequate.



**Evaluation Criterion**

- K.4. Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).

**Statement**

- K.4. The Plan (Section 2.7.4, Vol. 1) describes the radiological exposure control decision criteria for emergency workers. DPHS is responsible for all decisions relating to radiological exposure of State and local emergency workers. DPHS personnel located in the IFO/EOF will be kept informed of local emergency worker exposure via the local EOCs and will be directly responsible for State workers.

At predetermined dose levels, DPHS will either order emergency workers to leave the area or authorize increased exposures. As indicated in Table 2.7-1, (Vol.1) specific actions and decisions will be required at each reporting level. The decision on whether to instruct the emergency worker to leave the affected area or continue with his duties depends on how critical the worker is to the specific activities he is engaged in. Workers with dosimeter readings of 5 R or greater will be reported to the Radiological Exposure Clerk at the IFO/EOF for inclusion into the Radiological Screening Program (RSP). All local emergency workers who have this level of exposure will be ordered out of the affected area. Only State emergency workers, required to perform tasks deemed critical to the response by the DPHS IFO Controller and for whom no replacement is available, will be allowed to exceed a dosimeter reading of 5 R.

The DPHS IFO Coordinator must approve exposures to emergency workers in excess of 5R (Sec. 4, Vol. 6). The plan further indicates that at the 20 R exposure level, all appropriate emergency workers will be ordered to leave the affected area. This provides reasonable assurance that no emergency workers will be allowed to exceed the New Hampshire whole body exposure limit for emergency workers (EPA emergency worker PAG for whole body dose) of 25 rem. The decisions to allow emergency workers to exceed 20R whole body exposure will be made by the Director, DPHS in accordance with Sec. 8 of Vol. 8. Entry of affected areas will be allowed only by State emergency workers that have not reached this limit, or that have had no prior exposure.



**Plan Reference**

K.4. Vol. 1, Sec. 2.7, Table 2.7-1; Vol.6, Sec. 4; Vol. 8, Sec. 8; Vol. 20, Sec. 2.10.

**Evaluation**

K.4. Adequate.

**Evaluation Criterion**

K.5.a. Each organization as appropriate, shall specify action levels for determining the need for decontamination.

**Statement**

K.5.a. The Plan in Sec. 2.7.5 of Vol. 1 indicates that the action level for determining the need for decontamination is 100 cpm above background, measured using a CDV-700.

**Plan References**

K.5.a. Vol. 1, Sec. 2.7.5.

**Evaluation**

K.5.a. Adequate.

**Evaluation Criterion**

K.5.b. Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.

**Statement**

K.5.b. The Plan (Secs. 2.4.2 & 2.7.5, Vol. 1 and Sec. 2.10, Vol. 20) describes the means (personnel, equipment, facilities, and procedures) for decontamination of emergency personnel wounds, supplies, instruments, and equipment, and for waste disposal.

Emergency workers, vehicles, equipment and supplies will be monitored for contamination and, if required, decontaminated at the designated Emergency Worker Monitoring and Decontamination facility in Manchester, New Hampshire. In addition, local EOC's within the Plume Exposure EPZ are equipped with CDV-700 survey

meters. Therefore, local emergency workers may be screened for contamination at the local EOC. If local screening determines that the level of contamination on a person or on surfaces of equipment, supplies and vehicles exceeds 100 cpm above background, emergency workers will be referred to the designated Emergency Worker Monitoring and Decontamination facility in Manchester, New Hampshire.

If emergency workers are injured and require medical attention, decontamination personnel will refer them directly to a medical facility. State field monitoring team personnel, who are deployed from the IFO/EOF, will be monitored for contamination and decontaminated at the IFO/EOF under the supervision of DPHS. Monitoring and decontamination of their equipment, supplies, and vehicles will also be done at the IFO/EOF.

Monitoring and decontamination of emergency workers will be accomplished according to Sec. 5 of Vol. 8. Decontamination procedures will be implemented by emergency personnel under the supervision of the Division of Public Health Services. Disposal of contaminated wastes will be accomplished by DPHS personnel, or by qualified radioactive waste handlers under contract (Sec. 2.7.5 of Vol. 1). In addition, certain types of contaminated waste could be disposed of in accordance with an agreement between the State of New Hampshire and New Hampshire Yankee included in Vol. 50.

#### Plan Reference

K.5.b. Vol. 1, Secs. 2.4.2 & 2.7.5; Vol. 8, Sec. 5; Vol. 20, Sec. 2.10; Vols. 38-41, Sec. 4; Vol. 50.

#### Evaluation

K.5.b. Adequate.

**L. Medical and Public Health Support (Planning Standard L):**

Arrangements are made for medical services for contaminated injured individuals.

**Evaluation Criterion**

- L.1. Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

**Statement**

- L.1. The Plan in Sec. 2.8 of Vol. 1 and in Sec. 2.9 of Vol. 20 describes the arrangements for local and backup hospitals with medical services and capabilities for evaluation of radiological exposure and uptake. Elliot Hospital and Wentworth-Douglass Hospital are designated as MS-1 hospitals for off-site response in New Hampshire (Vol. 50).

**Plan Reference**

- L.1. Vol. 1, Sec. 2.8; Vol. 20, Sec. 2.9; Vol. 50.

**Evaluation**

- L.1. Adequate.

**Evaluation Criterion**

- L.3. Each State shall develop lists indicating the location of public, private and military hospitals and other emergency medical services facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contaminated personnel, and have facilities and trained personnel able to care for contaminated injured persons.

**Statement**

- L.3. The Plan contains a listing (App. D2.1.8 of Vol. 9) of "Local Medical Facilities Capable of Treating Radiation Accident Patients." This listing provides the names and



locations of the medical facilities as well as a brief summary of the "Capacity to Treat Exposed/ Contaminated Individuals."

**Plan Reference**

L.3. Vol 9, App. D2.1.8.

**Evaluation**

L.3. Adequate.

**Evaluation Criterion**

L.4. Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

**Statement**

L.4. The Plan in Sec. 2.8 of Vol. 1 and Sec. 2.9 of Vol. 20 describes the provision of ambulance resources for a radiological emergency. Emergency Medical Services are provided by ambulance services operated by local government or private organizations. Services within the jurisdiction of local dispatch centers are coordinated by the dispatch centers. During an emergency response, services outside the local dispatch service area will be acquired for evacuation functions. Vol. 9, App. D2.1.6 lists the services available in the State of New Hampshire. Letters of Agreement have been executed with the designated companies (Vol. 50).

The Plan in Sec. 2.8 of Vol. 1 states that if, during an emergency at Seabrook, ambulances are needed from outside the local service area, the EMS Liaison, in coordination with the EOC EMS Coordinator, will obtain required service.

**Plan Reference**

L.4. Vol. 1, Sec. 2.8; Vol. 9, App. D2.1.6; Vol. 20, Sec. 2.9; Vol. 50.

**Evaluation**

L.4. Adequate.

**M. Recovery and Reentry Planning and Post Accident Operations  
(Planning Standard M):**

General plans for recovery and reentry are developed.

**Evaluation Criterion**

- M.1. Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allows reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

**Statement**

- M.1. The Plan in Sec. 2.9 of Vol. 1 and Sec. 2.12 of Vol. 20 describes means by which decisions to relax protective measures will be reached.

When it has been determined that plant conditions have stabilized or are improving with no chance of worsening, the Governor, in consultation with the Director of NHOEM and the Director of DPMS shall direct that recovery operations shall begin. Following the initiation of recovery operations by the Governor, the Director of NHOEM or his designee will poll the heads of each of the agencies or departments within the EOC to determine the requirements to return the affected areas to their pre-emergency condition. As the recovery phase progresses, the Governor may allow selected positions of the emergency response organization to return to their non-emergency mode of operation (Sec. 2.9.1, Vol. 1).

Recovery actions are described in Sec. 2.9.2 (Vol. 1). As a temporary framework for recovery efforts, areas in which protective actions have been ordered will be considered suitable for normal activity when the dose commitments to residents are less than the levels established in App. E of Vol. 9. The criteria used as the basis for this temporary framework have been derived from the EPA Relocation PAGs (12/88 draft document). The goal for long-term recovery efforts will ensure that the dose commitments to the general public are less than the nonoccupational whole body exposure limits established in the New Hampshire Rules for Control of Radiation (Sec. 2.9 of Vol. 1).

If radiation has been released during the emergency, DPMS will conduct field monitoring, in areas in which sheltering or evacuation had been ordered, prior to the resumption of normal activities. Environmental sampling for ingestion pathway analysis will also be performed.

Restrictions on food and water will be lifted when DPHS has determined that levels of radioactive material found in food and water supplies have decreased below the PAGs for preventive actions established by the FDA. Decontamination of equipment, vehicles, and paved areas, etc. will be performed if surfaces have become contaminated by radioactive material.

**Plan Reference**

M.1. Vol. 1, Sec. 2.9; Vol. 9, App. E; Vol. 20, Sec. 2.12.

**Evaluation**

M.1. Adequate.

**Evaluation Criterion**

M.3. Each licensee and State plan shall specify means for informing members of the response organization that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

**Statement**

M.3. The Plan in Sec. 2.9 of Vol. 1 and Sec. 2.12 of Vol. 20 describes the means for informing staff that a recovery operation is to be initiated. Normal communications channels and procedures would be used for informing emergency response members that a recovery operation is to be initiated. Staffing positions established during the emergency response will initially remain active during the recovery phase. As the recovery progresses, the Governor may allow selected positions of the emergency response organization to return to their normal mode of operation. A recovery schedule will be established after the local officials have determined how long it would take to re-establish the emergency response organization at the local EOCs. This coordination process is designed to provide for an orderly return to normal municipal services. Recovery instructions will be broadcast to the public via the Emergency Broadcast System.

**Plan Reference**

M.3. Vol. 1, Sec. 2.9; Vol. 20, Sec. 2.12.



**Evaluation**

M.3. Adequate.

**Evaluation Criterion**

M.4. Each plan shall establish a method for periodically estimating total population exposure.

**Statement**

M.4. The Plan (Vol. 1, Sec. 2.9.4) describes provisions for periodically estimating total population exposure. These estimates will be made using population distribution information, monitoring data, dispersion calculations, plant releases, meteorology, and sheltering/evacuation information.

The Plan (Vol. 1, Sec. 2.9.4) stipulates that population exposure estimates will be on a whole body basis and will take into account weightings of specific organ doses, if deemed appropriate by accident assessment. All significant pathways will be considered: plume direct gamma, plume inhalation, deposition direct gamma, and deposition resuspension inhalation or ingestion.

**Plan Reference**

M.4. Vol. 1, Sec. 2.9.4.

**Evaluation**

M.4. Adequate.

**N. Exercises and Drills (Planning Standard N):**

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

**Evaluation Criterion**

N.1.a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in off-site radiological releases which would require response by off-site authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

**Statement**

N.1.a. The Plan indicates that the State of New Hampshire has made the commitment (Sec. 3.1.5 of Vol. 1, Sec. 3.3 of Vol. 20, Sec. 1.5 of Vols. 21-41) to participate in periodic radiological emergency preparedness exercises.

**Plan Reference**

N.1.a. Vol. 1, Sec. 3.1.5; Vol. 20, Sec. 3.3; Vols. 21-41, Sec. 1.5.

**Evaluation**

N.1.a. Adequate.

**Evaluation Criterion**

N.1.b. An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the annual exercise by Federal and State observers/evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five-year period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannounced.

**Statement**

N.1.b. The Plan (Sec. 3.1.5, Vol. 1) indicates that the exercise will be a test of the New Hampshire Emergency Response Organization's integrated capabilities. The local personnel will participate in joint exercises every two years. The State personnel will fully participate in the exercises at either Seabrook or Vermont Yankee on an annual rotational basis with each plant exercised every two years. When not fully participating in an exercise, the State will participate partially to support the full participation of the local response personnel. Once every six years the State will exercise the ingestion exposure pathway response plans in conjunction with an exercise.

The exercise scenario will be varied from exercise to exercise in order to test all the major elements of the plans and preparedness of the State and Local Emergency Response Organization within a six-year period. During this time frame, exercises will be scheduled at different seasons of the year to allow for exercising under various weather conditions. To complete the full range of exercise conditions, every six years one exercise will begin at night, between 6:00 p.m. and 4:00 a.m., and one will be unannounced.

The Plan stipulates that official observers from Federal and State agencies will observe, evaluate, and critique the exercises.

**Plan Reference**

N.1.b. Vol. 1, Sec. 3.1.

**Evaluation**

N.1.b. Adequate.

**Evaluation Criterion**

N.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:



**N.2.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.

**Statement**

N.2.a. The Plan (Sec. 3.1.2, Vol. 1, Sec. 3.3 of Vol. 20, & Sec. 1.5 of Vols. 21-41) commits the State to the conduct of periodic communications drills between the various organizations and key facilities in the New Hampshire emergency response organization.

The emergency communications systems to be used by the New Hampshire Emergency Response Organization are described in detail in Sec. 2.2 of Vol. 1. The schedule of drills to test that system is outlined in Table 3.1-1, including monthly drills with the Utility, State Police, NHCDA (NHOEM) and local governments; quarterly drills with the Utility, State Police, NHCDA (NHOEM), DPHS, Governor, contiguous States, and FEMA; and annual drills with NHCDA (NHOEM) and the State Emergency Response Organization. Field team communications are tested in annual radiological monitoring drills.

**Plan Reference**

N.2.a. Vol. 1, Secs. 2.2 and 3.1.2, Table 3.1-1; Vol. 20, Sec. 3.3; Vols. 21-41, Sec. 1.5.

**Evaluation**

N.2.a. Adequate.

**Evaluation Criterion****N.2.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 off-site medical treatment facility) shall be conducted annually. The off-site

portions of the medical drill may be performed as part of the required annual exercise.

**Statement**

N.2.c. The Plan in Sec. 3.1.3 of Vol. 1 commits the State to holding drills of off-site medical emergency capability on an annual basis. The Plan states that this drill may either be held separately or as part of the required biennial exercise.

**Plan Reference**

N.2.c. Vol. 1, Sec. 3.1.3.

**Evaluation**

N.2.c. Adequate.

**Evaluation Criterion**

N.2.d. Radiological Monitoring Drills

Plant environs and radiological monitoring drills (on-site and off-site) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.

**Statement**

N.2.d. The Plan (Sec. 3.1.4 of Vol. 1) describes the provision for holding combined radiological monitoring and health physics drills for DPHS staff at least annually. One of the drills will be held in conjunction with the exercises at Seabrook and Vermont Yankee. Each drill will include mobilization of the monitoring teams, dispatch of monitoring teams (at one of the two drills, field teams will be dispatched to the appropriate EPZ), collection of field samples, communication between field teams and the emergency facilities, and recordkeeping. The drills will include laboratory analysis of the field samples with simulated high radioactive activities, and use of the resultant data in accident assessment functions.

**Plan Reference**

N.2.d. Vol. 1, Sec. 3.1.4.

**Evaluation**

N.2.d. Adequate.

**Evaluation Criterion**

N.2.e. Health Physics Drills

Health Physics drills shall be conducted semi-annually which involve response to, and analysis of, simulated airborne and liquid samples and direct radiation measurements in the environment. The State drills need not be at each site.

**Statement**

N.2.e. The Plan in Sec. 3.1.4 of Vol. 1 states that health physics drills will be combined with radiological monitoring drills. (See Statement narrative for N.2.d.)

**Plan Reference**

N.2.e. Vol. 1, Sec. 3.1.4.

**Evaluation**

N.2.e. Adequate.

**Evaluation Criterion**

N.3. Each organization shall describe how exercises and drills are to be carried out to allow free play for decision making and to meet the following objectives. Pending the development of exercise scenarios and exercise evaluation guidance by NRC and FEMA the scenarios for use in exercises and drills shall include but not be limited to, the following:

N.3.a. The basic objective(s) of each drill and exercise and appropriate evaluation criteria.

**Statement**

N.3.a. The Plan (Sec. 3.1.5 of Vol. 1) states that the basic objectives for the exercises will be explained in terms of the emergency response functions to be exercised. At the full exercise, the State will test all nine of the emergency response functions described in Sec. 3.1.5 of Vol. 1. In a limited exercise, the State will, at a



minimum, test notification methods and accident assessment capabilities, with other functions tested as deemed necessary by NHOEM. Evaluation criteria will be provided to official observers.

**Plan Reference**

N.3.a. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.a. Adequate.

**Evaluation Criterion**

N.3.b. The date(s), time period, place(s) and participating organizations.

**Statement**

N.3.b. The Plan (Sec. 3.1.5 of Vol. 1) states that the date and time period described in the exercise scenario will coincide with the scheduling agreed upon with the Utility, with other appropriate states in the EPZ, and with NRC and FEMA. NHOEM will describe each emergency facility and the organizations that will participate in the exercise. The full exercise will include each agency in the New Hampshire Emergency Response Organization, including the appropriate local Emergency Response Organizations, and each emergency facility associated with the plant at which the accident is simulated. In the limited exercise, a smaller portion of the Emergency Response Organization may be involved. At a minimum, however, NHOEM, DPHS and State Police Communication Center will participate in any limited exercise.

**Plan Reference**

N.3.b. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.b. Adequate.

**Evaluation Criterion**

N.3.c. The simulated events.

**Statement**

N.3.c. The Plan (Sec. 3.1.5 of Vol. 1) states that the exercise scenario will include both initiating events and sufficient off-site events to meet the objectives of the exercise.

**Plan Reference**

N.3.c. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.c. Adequate.

**Evaluation Criterion**

N.3.d. A time schedule of real and simulated initiating events.

**Statement**

N.3.d. The Plan (Sec. 3.1.5 of Vol. 1) indicates that the schedule of events in the off-site scenario will be built around the initiating events at the power plant. These will include escalation through the Emergency Classification Levels. In addition, NHOEM will add sufficient off-site events to meet the objectives of the exercise.

**Plan Reference**

N.3.d. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.d. Adequate.

**Evaluation Criterion**

N.3.e. A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, off-site fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.

**Statement**

N.3.e. The Plan (Sec. 3.1.5 of Vol. 1) indicates that the exercise scenarios will include narrative summaries describing the conduct of the exercise. The narrative summary will include the schedule of real and simulated events, schedule of anticipated responses, and depth to which activities will be exercised or simulated. The narrative summary will enable observers and evaluators to trace the course of the exercise and to be prepared to observe the emergency response activities at critical milestones during the exercise.

**Plan Reference**

N.3.e. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.e. Adequate.

**Evaluation Criterion**

N.3.f. A description of the arrangements for and advance materials to be provided to official observers.

**Statement**

N.3.f. The Plan (Sec. 3.1.5 of Vol. 1) describes the arrangements to be made for exercise observers and the advance materials to be provided to them. NHOEM will work with FEMA to schedule the placement of observers during drills and exercises. Observers will be provided with an advance copy of the scenario and of the plans and procedures to be tested. Observers will be briefed as to the schedule of events and evaluation criteria for each observer location. Observers will be provided with evaluation sheets and guidelines applicable to their locations.

**Plan Reference**

N.3.f. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.3.f. Adequate.



**Evaluation Criterion**

- N.4. Official observers from Federal, State or local governments will observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.

**Statement**

- N.4. The Plan commits the State of New Hampshire to have official observers from Federal and State agencies to observe, evaluate, and critique the required exercises (Sec. 3.1.5 of Vol. 1). A critique will be conducted at the conclusion of each exercise to evaluate the performance of the State and local emergency personnel. The critique will be conducted as soon as practicable after the exercise. This critique will be followed by a formal evaluation of the response capability of each agency in the Emergency Response Organization. In most cases, FEMA will conduct the critique and supply a written evaluation. As necessary, the critique and evaluation efforts not sponsored by FEMA will be provided by NHOEM.

**Plan Reference**

- N.4. Vol. 1, Sec. 3.1.5.

**Evaluation**

- N.4. Adequate.

**Evaluation Criterion**

- N.5. Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control ~~and~~ to ensure that corrective actions are implemented.

**Statement**

- N.5. The Plan states that NHOEM will review all observer/evaluator comments on exercises and drills (Sec. 3.1.5 of Vol. 1). These comments will be brought to the attention of the appropriate members of the New

Hampshire Emergency Response Organization. Where inadequacies are cited, NHOEM will respond to the comments stating its concurrence or disagreement with the validity of the inadequacy. A schedule for undertaking remedial actions for confirmed inadequacies will be prepared by NHOEM within one month of receiving and reviewing evaluator comments. The schedule will be provided to FEMA and to the members of the Emergency Response Organization that are charged with the responsibility for undertaking corrective actions. All corrective actions will be implemented prior to the subsequent major exercise. The remedial actions may include NHRERP revisions, implementing procedure revisions, upgrading of facilities or equipment, and additional training and drills.

**Plan Reference**

N.5. Vol. 1, Sec. 3.1.5.

**Evaluation**

N.5. Adequate.

**O. Radiological Emergency Response Training (Planning Standard O):**

Radiological Emergency Response training is provided to those who may be called on to assist in an Emergency.

**Evaluation Criterion**

- O.1. Each organization shall assure the training of appropriate individuals.
- O.1.b. Each off-site response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police and ambulance/rescue, the training shall also be offered to the other departments who are members of the mutual aid district.

**Statement**

- O.1.b. The Plan describes the State's Radiological Emergency Response Training Program in Sec. 3.2 of Vol. 1. The Plan states (Sec. 3.2.2) that training will be provided to all organizations that comprise the New Hampshire Emergency Response Organization. A training matrix, which summarizes the concepts presented to each audience, is presented in Table 3.2-1. The audiences include personnel from State agencies, local response organizations, special facilities, bus drivers, ambulance personnel, county staffs, mutual aid organizations, Red Cross, EBS stations, and other key organizations. Local plans include their commitment to schedule local staff members for the training (Vol. 20, Sec. 3.2, Vols. 21-37, Sec. 2.6, & Vols. 38-41, Sec. 2.5). The Plan includes a commitment to support local training, including fire departments and medical support that support the EPZ communities under mutual aid agreements.

**Plan Reference**

- O.1.b. Vol. 1, Secs. 3.2, Table 3.2-1; Vol. 20, Sec. 3.2; Vols. 21-37, Sec. 2.6; Vols. 38-41, Sec. 2.5.

**Evaluation**

- O.1.b. Adequate.

**Evaluation Criterion**

- O.4. Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. The specialized initial training and periodic retraining programs



(including the scope, nature and frequency) shall be provided in the following categories:

- 0.4.a. Directors or coordinators of the response organizations.

**Statement**

- 0.4.a. The Plan describes the State's training program for agency directors and emergency planning coordinators in Sec. 3.2.3 of Vol. 1. The content of the training is shown on Table 3.2-1. The Plan indicates that the training for these individuals will be conducted by NHOEM once per year, and will focus on broad emergency planning concepts. NHOEM will cover each of the major elements of the NHRERP in these training sessions.

Participants in this training will be familiarized with the State's concept of operations. Material will cover the responsibilities of each agency in the Emergency Response Organization. Likewise, the training will cover basic concepts essential to understanding the State's Emergency planning efforts. These include Emergency Planning Zones (EPZs) in New Hampshire; Emergency Classification Levels, and the locations and functions of the various Emergency facilities within the State. State agency personnel with responsibilities requiring additional training will be scheduled for supplemental sessions.

**Plan Reference**

- 0.4.a. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

- 0.4.a. Adequate.

**Evaluation Criterion**

- 0.4.b. Personnel responsible for accident assessment.

**Statement**

- 0.4.b. The Plan describes the State's training program for accident assessment staff in Sec. 3.2.3 of Vol. 1. The Plan states that at least once per year DPHS will conduct accident assessment training for the staff and volunteers that it will use for dose calculation and projection work. DPHS staff that will be used for assignments in the State EOC, at the IFO/EOF duty stations will be included in the accident assessment

training. The training will cover the decision processes outlined in Sec. 2.5, and the predictive techniques contained in the DPHS Standing Operating Procedures. According to the Plan, the accident assessment training provided by DPHS will be supplemented by training provided by the Seabrook plant operator. As schedules permit, DPHS staff and volunteers will attend on-site training sessions at the plant site.

**Plan Reference**

O.4.b. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.3, Table 3.2-1.

**Evaluation**

O.4.b. Adequate.

**Evaluation Criterion**

O.4.c. Radiological monitoring teams and radiological analysis personnel.

**Statement**

O.4.c. The Plan describes the State's training program for radiological monitoring and analysis staff in Sec. 3.2.3 of Vol. 1. The Plan states that once per year DPHS will conduct training for its monitoring and analysis teams. This training will include familiarization and use of the instrumentation available in each of the field monitoring kits. In addition the training will include familiarization with procedures for mobilization and dispatching field teams, locations of monitoring sites, procedures for communicating, and dispatching field samples. The Utility also will include DPHS staff and volunteers in training being provided to the Utility monitoring teams as necessary. This training will be used to supplement the training provided by DPHS. The training will be scheduled to precede the periodic drills and exercises. This will provide a means of verifying the adequacy of the training.

**Plan Reference**

O.4.c. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

O.4.c. Adequate.

**Evaluation Criterion**

O.4.d. Police, security and fire fighting personnel.

**Statement**

O.4.d. The Plan describes the State's training program for police, security and fire-fighting personnel in Sec. 3.2.3 of Vol. 1. The Plan indicates that State responsibility in this area is limited to access control and traffic control functions. Once per year NHOEM will instruct State Police, National Guard and Department of Transportation personnel on access control and traffic control functions. The instruction will include EPZ locations and boundaries, location of access and traffic control points, and procedures for manning access control points. In addition, those that may be called upon to respond to requests for police and security support within an EPZ will be given basic radiological exposure control instruction.

The Plan states that since on-site police, security, EMS or fire fighting support is provided by Utility personnel, contractors, and by local emergency workers in the Town of Seabrook where the Town and Utility have support agreements, training of these people will be handled by the Utility directly.

**Plan Reference**

O.4.d. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

O.4.d. Adequate.

**Evaluation Criterion**

O.4.f. First aid and rescue personnel.

**Statement**

O.4.f. The Plan describes the State's training program for medical support and rescue personnel in Sec. 3.2.3 of Vol. 1. The content of the training is shown on Table 3.2-1. The Plan indicates that EMS will coordinate training for emergency workers with medical support and rescue responsibilities. To support mutual aid agreements, the training will be provided to the entire EMS region in which the EPZ communities are located. The training will include an overview of the NHRERP, emergency classifications, notification, and protective actions with an emphasis on evacuation



concepts. The EMS instruction will also include basic radiological exposure control for emergency workers.

**Plan Reference**

O.4.f. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

O.4.f. Adequate.

**Evaluation Criterion**

O.4.g. Local support services personnel including Civil Defense/Emergency Service personnel.

**Statement**

O.4.g. The Plan describes the State's training for local support services personnel in Sec. 3.2.3 of Vol. 1 and is shown on Table 3.2-1.

Training will be provided for support service agencies (DHS, Red Cross), local volunteers, staging area staff, bus and ambulance drivers, towing company drivers, decontamination center personnel, special facilities staff, local EOC staff, local police and fire personnel, and mutual aid fire departments.

Support personnel involved in management and operation of the reception centers will receive training in descriptions of the EPZs, locations of the reception centers, and support service functions at these facilities.

Transportation personnel will receive training in the NHRERP and emergency response organization, notification, ECLs, protective actions, locations of staging areas and garages, basic radiation concepts, and radiation exposure control.

Decontamination Center personnel will receive a training program which consist of two phases. The first phase, a lecture and slide presentation, will include an overview of emergency planning concepts, such as the response organization, emergency planning zones, emergency classification, emergency facilities, notification, and protective response. Basic radiation concepts, radiological exposure control, and use of dosimetry will also be covered. The second phase of training will be a practical demonstration and exercise of the skills used in the Decontamination Center. Topics in this session include activation of the facility, use of protective clothing, survey methods for personnel and vehicles, and decontamination procedures.

Special facilities staff will receive training in the NHRERP, ECLs, and notification, focusing on the implementation of protective actions in these facilities.

For local EOC, police, fire, and mutual aid personnel, training will focus upon the State-local interface, and the responsibilities of the local response organizations, but it will also cover basic elements of radiological emergency response.

The local EOC staff will receive training on EOC operations, to review such aspects as the town emergency response organization, use of procedure checklists, message forms, and status boards, internal communication, and EOC security. Additional training will be provided to the radiological officer on maintenance of radiological equipment, procedures for issuing dosimetry, and maintenance of exposure records.

**Plan Reference**

O.4.g. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

O.4.g. Adequate.

**Evaluation Criterion**

O.4.h. Medical support personnel.

**Statement**

O.4.h. The Plan describes the State's training program for medical support and rescue personnel in Sec. 3.2.3 of Vol. 1. See the Statement under element O.4.f.

**Plan Reference**

O.4.h. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

**Evaluation**

O.4.h. Adequate.

**Evaluation Criterion**

O.4.j. Personnel responsible for transmission of emergency information and instructions.

**Statement**

O.4.j. The Plan describes the State's training program for personnel involved in the communication of emergency information in Sec. 3.2.3 of Vol. 1. The content of the

training is shown on Table 3.2-1.

The Plan indicates that NHOEM will provide annual instruction to those personnel that have key roles in notification and emergency communications. These people include the supervisors and dispatchers at the State Police Communications Center, Rockingham County Dispatch Center, local dispatch centers, and representatives of EBS stations. Instruction will include discussion of notification procedures and messages, emergency communication equipment and facilities, and emergency public information. Instruction will also cover description of EPZ locations, Emergency Classification Levels and an overview of the NHRERP. Any agencies and individuals with responsibility for activation of the Alert/Notification System will receive training on the procedures for use of the system.

#### Plan Reference

0.4.j. Vol. 1, Secs. 3.2.2, 3.2.3, 3.2.4, Table 3.2-1.

#### Evaluation

0.4.j. Adequate.

#### Evaluation Criterion

0.5. Each Organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

#### Statement

0.5. The Plan indicates that the NHOEM Emergency Planning Coordinator will provide for the initial and annual retraining of personnel with radiological emergency response responsibilities and that he will administer the radiological emergency response training program (Sec. 3.2.4 of Vol. 1). NHOEM will coordinate the scheduling of each of the training sessions with the agency responsible for providing the training.

The Plan indicates that training will be provided to all organizations that comprise the New Hampshire Emergency Response Organization. The training will be provided at least annually, and more frequently if significant NHRERP changes are implemented, or if inadequacies in emergency response capability are discovered. The commitment to provide this training is also reflected in local community plans (Vols. 21-41, Sec. 1.5).

The training program consists of training in the following concepts (Sec. 3.2.2 of Vol. 1):

- Basic Emergency Planning Concepts



- Notification
- Protective Actions
- Radiation Concepts
- Radiological Exposure Control
- EOC Operations
- Procedure Checklists
- Traffic Management
- Operation of Alert and Notification System
- Radiological Monitoring Equipment and Exposure Records
- Reception Center Operations
- Decontamination Center Operations
- Staging Area Operations
- Accident Assessment
- Radiological Monitoring and Analysis
- Protective Action Decision Making
- Family Plan.

Different groups will receive training in different combinations of the above concepts, according to need. The Plan stipulates that attendance will be taken at each scheduled training session. Attendance forms will be forwarded to NHOEM as a permanent record of required training.

**Plan Reference**

0.5. Vol. 1, Sec. 3.2; Vols. 21-41, Sec. 1.5.

**Evaluation**

0.5. Adequate.

**P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans (Planning Standard P):**

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

**Evaluation Criterion**

P.1. Each organization shall provide for the training of individuals responsible for the planning effort.

**Statement**

P.1. The Plan in Sec. 3.2 of Vol. 1 describes the commitment to provide for initial and annual retraining of emergency response personnel, including those responsible for the planning effort. Specific training for Emergency Planning Coordinators is described in Sec. 3.2.3 (Vol. 1).

**Plan Reference**

P.1. Vol. 1, Sec. 3.2.

**Evaluation**

P.1. Adequate.

**Evaluation Criterion**

P.2. Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.

**Statement**

P.2. The Plan (Sec. 1.1.2 of Vol. 1) indicates that the Director of the NHCDA (NHOEM) has overall authority and responsibility for radiological emergency response planning, including development, distribution, maintenance, and testing of the NHRERP. At the local community level (Sec. 1.2 of Vols. 21-41), the Selectmen or designee are indicated as being responsible for the planning effort.

**Plan Reference**

P.2. Vol. 1, Sec. 1.1.2; Vols. 21-41, Sec. 1.2.

**Evaluation**

P.2. Adequate.

**Evaluation Criterion**

- P.3. Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.

**Statement**

- P.3. The Plan in Sec. 3.3.2 of Vol. 1 indicates that the Director of NHCDA (NHOEM) is responsible for the overall development of the NHRERP.

The Plan (Sec. 3.3.2 of Vol. 1) indicates that each agency within the New Hampshire Emergency Response Organization has designated an Emergency Planning Coordinator. The Emergency Planning Coordinators are responsible for coordinating their agencies planning efforts, disseminating revisions to the NHRERP, and informing NHOEM of any needed updating of plans, procedures, or training.

Sec. 1.5 of Vols. 21-41 indicates a designation of a person responsible for coordinating, updating, and distributing changes to the local emergency plan.

**Plan Reference**

- P.3. Vol. 1, Sec. 3.3.2; Vols. 21-41, Sec. 1.5.

**Evaluation**

- P.3. Adequate.

**Evaluation Criterion**

- P.4. Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.

**Statement**

- P.4. The Plan describes the process of updating of the NHRERP and its agreements (Sec. 3.3.3, Vol. 1). The Plan states that the Director of NHOEM will ensure that the NHRERP, supporting implementing procedures, and emergency planning agreements are reviewed and updated as changes in emergency preparedness status take place.

At least annually, the Director will direct that a plan review is performed to ensure that the NHRERP reflects current emergency preparedness status and issue updated copies. Provisions are described for annual review and update of the local municipality plans in Sec. 3.4 of



Vol. 20 and Sec. 1.5 of Vols 21-41.

The Director of NHOEM will certify annually, by letter to FEMA, compliance with the "periodic requirements for the preceding year."

**Plan Reference**

P.4. Vol. 1, Secs. 3.3.2 and 3.3.3; Vol. 20, Sec. 3.4; Vols. 21-41, sec. 1.5.

**Evaluation**

P.4. Adequate.

**Evaluation Criterion**

P.5. The Emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

**Statement**

P.5. The Plan indicates (Sec. 3.3.2 of Vol. 1) that the Director of NHOEM will ensure that copies of the NHRERP are numbered, and that distribution of the plan will be controlled and registered by serial number. All changes will be entered in the control copies and noted both in a master plan distribution log kept by NHOEM at its offices, and in a log sheet of revisions kept in the front of each copy of the Plan.

As part of the distribution to plan holders, the Director will summarize the plan changes implemented since the preceding review and all revised pages shall be dated and marked to show where changes have been made. Distribution will be made to FEMA, to the Emergency Planning Coordinator for each agency within the New Hampshire Emergency Response Organization, the Civil Defense Directors of the local municipalities, to the power plant operators, and to other persons holding controlled copies of the NHRERP. At the local level, the distribution of updated copies of the plans to individual members of the local emergency response organization will be done by the local official designated in Sec. 1.5 of Vols. 21-41.

The Plan in Sec. 3.3.2 of Vol. 1 indicates that the Emergency Planning Coordinators for the other agencies within the New Hampshire Emergency Response Organization are responsible for disseminating revisions to the NHRERP, and its implementing procedures, to the emergency workers within their own agencies.

**Plan Reference**

P.5. Vol. 1, Sec. 3.3; Vols. 21-41, Sec. 1.5.

**Evaluation**

P.5. Adequate.

**Evaluation Criterion**

P.6. Each plan shall contain a detailed listing of supporting plans and their source.

**Statement**

P.6. The Plan (Sec. 3.3 of Vol. 1) indicates that the State of New Hampshire Radiological Emergency Response Plan is supported by local Radiological Emergency Response Plans. The Plan in Sec. 3.3 of Vol. 1 states that each community (both plume EPZ and host communities) is responsible for compiling and maintaining their own plan. The local supporting plans are listed in App. F of Vol. 9.

**Plan Reference**

P.6. Vol. 1, Sec. 3.3; Vol. 9, App. F.

**Evaluation**

P.6. Adequate.

**Evaluation Criterion**

P.7. Each plan shall contain as an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.

**Statement**

P.7. The Plan in Sec. 3.3 of Vol. 1 and in Sec. 1.6 of Vols. 21-41 contains the implementing procedures.

**Plan Reference**

P.7. Vol. 1, Sec. 3.3; Vols. 21-41, Sec. 1.6.

**Evaluation**

P.7. Adequate.

**Evaluation Criterion**

- P.8. Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these criteria.

**Statement**

- P.8. The Plan contains a table of contents and a cross reference index to evaluation criteria of NUREG-0654/FEMA-REP-1, Rev. 1. Separate tables of content are provided in Vol. 1 and for each local plans. The cross-reference index is provided in App. F of Vol. 9.

**Plan Reference**

- P.8. Vol 1 & Vols. 21-41, Table of Contents, Vol. 9, App. F.

**Evaluation**

- P.8. Adequate.

**Evaluation Criterion**

- P.10. Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly.

**Statement**

- P.10. The Plan describes provisions for updating telephone numbers in emergency procedures on a quarterly basis. As indicated in Sec. 3.3.3 of Vol. 1, the NHOEM Director will see that the Emergency Phone Listing is reviewed for accuracy at least quarterly. The local community plans (Vols. 21-41) describe provisions for a quarterly update of telephone numbers (Sec. 1.5).

**Plan Reference**

- P.10. Volume 1, Sec. 3.3.3; Vols. 21-41, Sec. 1.5.

**Evaluation**

- P.10. Adequate.



## Plan Review Rating Summary

<u>Element</u>	<u>Rating</u>	<u>Element</u>	<u>Rating</u>	<u>Element</u>	<u>Rating</u>
A.1.a	A	H.3	A	N.1.a	A
A.1.b	A	H.4	A	N.1.b	A
A.1.c	A	H.7	A	N.2.a	A
A.1.d	A	H.10	A	N.2.c	A
A.1.e	A	H.11	A	N.2.d	A
A.2.a	A	H.12	A	N.2.e	A
A.2.b	A	I.7	A	N.3.a	A
A.3	A	I.8	A	N.3.b	A
A.4	A	I.9	A	N.3.c	A
C.1.a	A	I.10	A	N.3.d	A
C.1.b	A	I.11	A	N.3.e	A
C.1.c	A	J.2	A	N.3.f	A
C.2.a	A	J.9	A	N.4	A
C.3	A	J.10.a	A	N.5	A
C.4	A	J.10.b	A	O.1.b	A
D.3	A	J.10.c	A	O.4.a	A
D.4	A	J.10.d	A	O.4.b	A
E.1	A	J.10.e	A	O.4.c	A
E.2	A	J.10.f	A	O.4.d	A
E.5	A	J.10.g	A	O.4.f	A
E.6	A	J.10.h	A	O.4.g	A
E.7	A	J.10.i	A	O.4.h	A
F.1.a	A	J.10.j	A	O.4.j	A
F.1.b	A	J.10.k	A	O.5	A
F.1.c	A	J.10.l	A	P.1	A
F.1.d	A	J.10.m	A	P.2	A
F.1.e	A	J.11	A	P.3	A
F.2	A	J.12	A	P.4	A
F.3	A	K.3.a	A	P.5	A
G.1	A	K.3.b	A	P.6	A
G.2	A	K.4	A	P.7	A
G.3.a	A	K.5.a	A	P.8	A
G.4.a	A	K.5.b	A	P.10	A
G.4.b	A	L.1	A		
G.4.c	A	L.3	A		
G.5	A	L.4	A		
		M.1	A		
		M.3	A		
		M.4	A		