UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
PENNSYLVANIA POWER & LIGHT COMPANY	)	
	)	
and	)	Docket Nos. 50-387
	)	50-388
ALLEGHENY ELECTRIC COOPERATIVE, INC.	)	
	)	
(Susquehanna Steam Electric Station, Units 1 and 2)	)	

APPLICANTS' TESTIMONY OF
ORAN K. HENDERSON
ON CONTENTION 6(b)

September 29, 1981

Contention 6b.

There is considerable question of the ability of Pennsylvania's Office of Radiological Health to fulfill its assigned functions in the event of an emergency. The Director of that office stated at a public meeting that his staff would not be able to respond at all hours to an accident at a nuclear facility. He has also, by affidavit, denied having made such a statement. This question must be resolved. Furthermore, the office has been unsuccessful in obtaining the amount of funding required to provide adequate qualified staff and equipment to be able to expand its capability to monitor and respond to a radiation emergency situation at Susquehanna.

Analysis:

Paragraph A.8., Section VII, "Responsibilities" of Annex E to the Pennsylvania Disaster Operations Plan, assigns to the Bureau of Radiation Protection (BRP), Department of Environmental Resources specific tasks. These tasks include:

1. Maintain plans and procedures to meet criteria established by NUREG 0654.

2. Conduct incident assessment.

3. Provide technical guidance and assistance to State, County and municipal agencies.

4. Coordinate placement of offsite monitoring devices.

5. Provide PEMA periodic evaluations of incident situations.

6. Maintain a watch system during non-duty periods to ensure mobilization of response mechanism.

7. Provide liaison to the SSES Emergency Operation Facility following its activation.

8. Develop, in coordination with Department of Health and PEMA, public educational information regarding radiation.

9. Provide response team member to PEMA Emergency Operation Center upon its activation.

Attachment 1 to the State RERP "Primary and Support Responsibility chart," lists BRP as the lead agency for: 1) Incident Assessment, and 2) Radiological Exposure Control.

Based upon the above tasking, and BRP's normal functions, it prepared Appendix 8 "BRP Plan for Nuclear Power Generating Station Incidents" dated August 1981. Appendix 8, serves as both an instructional and information document as well as describing BRP procedures and operational arrangements.

Paragraph 2.0, App 8, describes BRP organizational scheme for managing the response to incidents at nuclear power stations. It establishes the initial notification responsibilities and provides for the rapid alerting and mobilizing of the BRP staff. It further describes specific responsibilites of each group during th initial notification and the continuing operations phases. Table 3-A (page 7) lists the role agency personnel are to play and their respective locations. Section 8.0 (page 23) describes the BRP facilities and equipment. Figure 6-1 (page 21) shows a radio network between the BRP headquarters, its Regional Offices, its mobile laboratory and its field monitoring teams. The schematic (figure 6-1) also shows dedicated telephone connections from the BRP headquarters to both PEMA and the Utility.

BRP received last year some $300,000 from the Pennsylvania General Assembly to improve its mobile laboratory capability and for selected monitoring equipment. It has received additional funding through Department reprogramming for further equipment upgrading. The Department of Environmental Resources is presently involved in the development of a statewide radio communications system which will greatly improve communications capability. Since the March 1979 accident at TMI, the BRP staffing has increased from 21 to 27 and its funding has been increased from approximately $600,000 to $990,000. (Fiscal Year 82)

During the critique of the 2 June 1981 exercise for the TMI plume exposure emergency planning zone the Bureau of Radiation Protection, Department of Environmental Resources received from FEMA minor critical comments; however, in general the report reflected that BRP met or exceeded the standards. In general, the exercise showed that BRP had the wherewithal to perform its role adequately. Extrapolating this exercise performance to the SSES, even with the time-distance variables factored into the equation, one could reasonably expect BRP could perform its role in an above satisfactory manner.