

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
TEXAS UTILITIES GENERATING COMPANY, ) Docket Nos. 50-445  
ET AL. ) 50-446  
(Comanche Peak Steam Electric )  
Station, Units 1 and 2) )

NRC STAFF SUPPLEMENTARY TESTIMONY OF  
DAVID M. ROHRER AND THOMAS URBANIK II  
ON EMERGENCY PREPAREDNESS

- Q1. Mr. Rohrer, please state your name and occupation.
- A1. My name is David M. Rohrer. I am employed by the U.S. Nuclear Regulatory Commission as an Emergency Preparedness Analyst in the Emergency Preparedness Branch, Division of Emergency Preparedness and Engineering Response, Office of Inspection and Enforcement.
- Q2. Please describe the nature of the responsibilities you have had with respect to nuclear power plant emergency preparedness.
- A2. (Rohrer) Since May 1980, I have had responsibility for the review and evaluation of radiological emergency response plans submitted by nuclear power plant license applicants and licensees to assure that the proposed plans meet the regulatory requirements and guidance of the Commission. I also function as a Team Leader and Team Member on Emergency Preparedness Implementation Appraisal Teams engaged in

the onsite inspections of the implementation phase of licensee's emergency preparedness programs. I observe nuclear power plant emergency drills and exercises, including those involving State and local government response agencies. I also participate in inter-agency critiques of emergency planning, and am a member of the NRC Headquarters incident response team.

- Q3. Have you prepared a statement of professional qualifications?
- A3. (Rohrer) Yes. A copy of my statement of professional qualifications was received into evidence at Tr. 5693-94.
- Q4. Please describe the nature of the responsibilities you have had with respect to the Comanche Peak Steam Electric Station ("CPSES").
- A4. (Rohrer) I performed the NRC Staff's ("Staff") review and evaluation of the Comanche Peak Emergency Plant ("Applicant's Plan") Revision Three, dated May 21, 1982, Revision Four dated August 20, 1982 and Revision Five, dated October 12, 1982. I also was responsible for preparing Chapter 22, Sections III.A.1.1, "Upgrade Emergency Preparedness," III.A.1.2, "Emergency Response Facilities," III.A.2, "Improving Licensee Emergency Preparedness--Long Term," and Appendix G, "Emergency Preparedness Evaluation Report," of the Safety Evaluation Report, Supplement 3 ("SSER No. 3") for CPSES.
- Q5. Mr. Urbanik, please state your name and occupation.

A5. My name is Thomas Urbanik II. I am an Assistant Research Engineer associated with the Texas Transportation Institute of the Texas A&M University System, College Station, Texas.

Q6. Have you prepared a statement of your professional qualifications?

A6. (Urbanik) Yes. A statement of my professional qualifications is attached to this testimony.

Q7. In what capacity are you testifying in this proceeding?

A7. (Urbanik) I am testifying on behalf of the NRC Staff, for which I serve as a subcontractor through the Battelle Pacific Northwest Laboratories which is responsible under contract to the Nuclear Regulatory Commission for reviewing evacuation time estimates of nuclear facilities.

Q8. Briefly summarize your experience with evacuation time estimate studies for nuclear facilities.

A8. (Urbanik) I was a principal author of NUREG/CR-1745, "Analysis of Techniques for Estimating Evacuation Times for Emergency Planning Zones" (November 1980), which described the limitations of several methodologies and some alternatives for determining evacuation time estimates. Also, I provided input to the development of the current guidance for evacuation time estimate studies which appear in Appendix 4 to NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants"

(NUREG-0654/FEMA-REP-1, Rev. 1, November 1980). In addition, I reviewed the initial evacuation time estimate study submittals of approximately 52 operating and near term nuclear facilities for the NRC against the guidance of NUREG-0654, Revision 0, the results of which are published in NUREG/CR-1856, "An Analysis of Evacuation Time Estimates Around 52 Nuclear Power Plant Sites" (May 1981). I am currently reviewing revisions to evacuation time estimate studies and new submittals against NUREG-0654, Revision 1.

Q9. What is the purpose of your testimony?

A9. (Urbanik) The purpose of this testimony is to address the manner in which the evacuation time estimates for the Plume Exposure Pathway EPZ for CPSES which appears in Appendix N to the CPSES Emergency Plan, and Attachment G, "Evacuation Procedures" to the Manual of Emergency Procedures of the Hood and Somervell County Emergency Operations Plans, compare to the guidance of NUREG-0654, Appendix 4.

Q10. Mr. Rohrer, what regulatory provisions and Staff guidance does the Staff utilize in evaluating the adequacy of the Applicants' Plan with respect to emergency response support and resources?

A10. (Rohrer) The Staff utilizes 10 C.F.R. § 50.47(b)(3), 10 C.F.R. Part 50, Appendix E(IV)(A), and Regulatory Guide 1.101, Revision 2, Section II.C. in evaluating the adequacy of the Applicants' Plan with regard to emergency response and support.

Q11. Has the Staff evaluated the adequacy of the Applicants' Plan with respect to emergency response support capabilities and resources? If so, what is the Staff's conclusion in this regard, and where is this documented?

A11. (Rohrer) The Staff has evaluated the adequacy of the Applicants' Plan through Revision 5, dated October 13, 1982, and has documented its conclusions in Section 3.C of Appendix G to Supplement 3 to the Safety Evaluation Report (SSER 3) for the Comanche Peak Steam Electric Station (NUREG-0797). The Staff found that the Applicants' Plan met the planning standard of 10 C.F.R. 50.47(b)(3); the requirements of 10 C.F.R. Part 50, Appendix E(IV)(A); and the guidance criteria in Section II.C of NUREG-0654 with the exception of two items requiring resolution. Those items were: C-1, an adequate identification of individuals within the Applicants' emergency response organization who are responsible for the direction and coordination of requested Federal Assistance was not provided; and C-2, an adequate description of the Applicants' backup laboratory in their EOF was not provided.

Q12. When will these items have to be adequately addressed by Applicants, and resolved?

A12. (Rohrer) Items C-1 and C-2 must be resolved prior to fuel load.

Q13. What regulatory provisions and Staff guidance does the Staff utilize in evaluating the adequacy of the Applicants' Plan with regard to notification methods and procedures?

A13. (Rohrer) The Staff utilizes 10 C.F.R. § 50.47(b)(5), 10 C.F.R. Part 50, Appendix E(IV)(D), and Regulatory Guide 1.101, Revision 2, Section II.E in evaluating the Applicants' Plan with regard to notification methods and procedures.

Q14. Has the Staff evaluated the adequacy of the Applicants' notification methods and procedures? If so, what is the Staff's conclusion in this regard, and where is this documented?

A14. (Rohrer) The Staff has evaluated the Applicants' provisions in this area and has documented its conclusions in Section 3.E of Appendix G to SSER 3. The Staff found that the Applicants' Plan met the regulatory requirement and Staff guidance with the exceptions of two items requiring resolution. Those items were: E-1, an adequate description of the final locations and capabilities of the prompt notification system was not provided; and E-2, the content of initial and followup messages to response organization and the public was not provided.

Q15. When will these items have to be adequately addressed by Applicants, and resolved?

A15. (Rohrer) These items must be resolved prior to fuel load.

Q16. What regulatory provisions and Staff guidance does the Staff utilize in evaluating the adequacy of the Applicants' emergency facilities and equipment?

A16. (Rohrer) The Staff utilizes 10 C.F.R. § 50.47(b)(8), 10 C.F.R. Part 50, Appendix E.IV(E), Supplement 1 to NURE-0737, and Regulatory Guide 1.101, Revision 2, Section II.H, in its evaluation of the adequacy of the Applicants' Plan regarding emergency facilities and equipment. NUREG-0694 establishes the time requirements for satisfactory resolution of NUREG-0737 requirements.

Q17. Has the Staff evaluated the adequacy of the Applicants' emergency facilities and equipment? If so, what was the Staff's conclusion in this regard, and where is it documented?

A17. (Rohrer) The Staff has evaluated the Applicants' Plan's provisions in this area and has documented its conclusions in Section 3.14 of Appendix G to SSER 3. The Staff found that the Applicants' emergency plan met the regulatory requirements as interim facilities adequate for licensing. However, the Staff also stated that the adequacy of the interim facilities as final Emergency Response Facilities (FRPs) would be determined during an onsite post implementation review in accordance with the requirements and procedures given in Supplement 1 to NUREG-0737.

Q18. Are there any items requiring resolution in this area?

A18. (Rohrer) No.

Q19. What regulatory provisions and Staff guidance does the Staff utilize in evaluating the adequacy of Applicants' capabilities for accident assessment?

A19. (Rohrer) The Staff utilizes 10 C.F.R. § 50.47(b)(9), 10 C.F.R. Part 50, Appendix E(IV)(B), and Regulatory Guide 1.101, Revision 2, Section II.I in its evaluation of the adequacy of the Applicants' Plan with regard to the Applicants' capabilities for accident assessment.

Q20. Has the Staff evaluated the capabilities of the Applicant to assess accidents occurring at CPSES? If so, what were the Staff's conclusions and where is it documented?

A20. (Rohrer) The Staff has evaluated the adequacy of the Applicants' provisions in this area and has documented its conclusions in Section 3.I of Appendix G to SSER 3. The Staff found that the Applicants' Plan did not provide adequate specific information on which the Staff could base a safety finding. The Staff identified four items requiring resolution. Those four items are: I-1, relationship between plant system values to radioactivity released or available for release; I-2, relationship between plant system values to radiological exposures and contamination levels; I-3, the capability and use of meteorological equipment and information for accident assessment or projection; and I-4, the relationship between measured system values to doses for specific key isotopes.

Q21. When will these items have to be addressed by Applicants, and resolved?

A21. (Rohrer) These items must be resolved prior to fuel load.

Q22. Mr. Urbanik, what was the scope of your review of the Applicant's evacuation time estimate study for CPSES?

A22. (Urbanik) I conducted a review of the Applicant's evacuation time estimate study at the request of the NRC Staff. The results of the Applicant's study, as well as the methodology used to develop the evacuation time estimates, were evaluated and compared with the guidance of Appendix 4 to NUREG-0654, Revision 1.

Q23. What regulatory provisions and Staff guidance did you utilize in evaluating the adequacy of the Applicants' evacuation time estimates?

A23. (Urbanik) In conducting my review, I considered various elements set forth in Appendix 4 to NUREG-0654, Revision 1, which the NRC and FEMA believe should be included in evacuation time studies. These considerations include: (a) an accounting for permanent, transient, and special facility populations in the plume exposure EPZ; (b) an indication of the traffic analysis method and the method of arriving at road capacities; (c) consideration of a range of evacuation scenarios (generally representative of normal through adverse evacuation conditions; (d) consideration of confirmation of evacuation; (e) identification of critical links and need for traffic control; and (f) use of methodology and traffic flow modeling techniques for various time estimates, consistent with the guidance of NUREG-0654, Revision 1, Appendix 4.

Q24. Briefly describe the methodology employed in the Applicants' evacuation time estimates study.

A24. (Urbanik) Population data from the 1980 U.S. Census plus information from local officials and company counts were translated into the number of vehicles based on estimated vehicle occupancy. An occupancy figure of 1.82 persons per vehicle was used based on Texas Department of Highways and Public Transportation figures for Hood and Somervell Counties. It is likely that this occupancy figure overestimates the actual number of vehicles that might be used since not every family would use all vehicles available.

Evacuation routes were selected using primary and secondary roadways and an assumed capacity of 1000 vehicles per lane per hour. This roadway capacity is readily achievable.

Evacuation time estimates were then computed based on actual driving time measurements and the experience of state emergency planning officials. Given the low density of the site, evacuation time estimates are dependent on preparation time and driving time. Since the evacuation time is not controlled by capacity induced delays, the methodology is adequate for the site.

A25. What were your conclusions on the adequacy of the Applicants' evacuation time estimates.

A25. (Urbanik) The Applicants' evaluation time estimate contains the documentation specified in NUREG-0654, Revision 1, Appendix 4, and the estimate is consistent with that guidance. Accordingly,

Criteria 10.1 of NUREG-0654, Revision 1, Chapter II, Section J has been complied with by Applicants.

Q26. Are there any items requiring resolution concerning the evacuation time estimates?

A26. (Urbanik) No.

Q27. Mr. Rohrer, are there any regulatory provisions or Staff guidance which specifies acceptable upper limits for evacuation times for nuclear power plant plume exposure EPZs?

A27. (Rohrer) No, there are no regulatory provisions or Staff guidance which specify upper limits on evacuation times. Accordingly, the Staff does not determine whether an evacuation time estimate is "acceptable".

Q28. Please explain why there is no Staff guidance on acceptable upper limits for evacuation times for plume exposure EPZs?

A28. (Rohrer) The Staff has not developed guidance setting forth upper limits on evacuation times, and does not review evacuation time estimates submitted by nuclear power plant applicants to determine if they are within acceptable upper limits for several reasons. One reason is that even the best emergency preparedness cannot assure that severe health effects or even fatalities will not occur for the worst case accidents. There is always some accident that can be postulated where actions for the public could not be taken fast enough to avoid fatalities, although such events would

be of extremely low likelihood. A finding that evacuations can be carried out in a particular length of time does not therefore provide assurance that health effects will not be incurred or even that health effects will be minimized in any particular case. In a severe event, the best course of action to minimize health effects may well be sheltering rather than evacuation. The time taken to make protective action and to communicate with the public, which is specified as a goal in our regulations, is therefore more important than a calculated evacuation time which is necessarily highly dependent on the assumptions made as to weather and time of day.

Another reason for not specifying acceptable maximum evacuation times is that under certain conditions (blizzards, floods earthquakes) evacuations may not be feasible or desirable. Various gradations of such conditions or other circumstances which could be postulated for particular sites make evacuation times not specifically predictable in advance within wide margins.

One possible use of an upper limit for estimated evacuation times would be its use as a siting tool prior to the granting of a construction permit. The conclusion of the joint NRC/EPA task force that addressed this point was that the current guidance on population density for nuclear power plant sites in use by the NRC is adequate to generally assure that evacuation is a feasible option under normal weather conditions.

While the NRC does not regulate power plant operation or siting through the use of maximum allowable evacuation times, the NRC does require that evacuation time estimates be made for two reasons. First, during the process of making the estimates, any situations requiring special attention during the planning process can be identified. For example, by providing traffic controls at particular intersections, evacuation times can be substantially reduced by minimizing the queues formed at these intersections, thus providing an optimum use of available resources. Second, during the course of an accident, evacuation time estimates made in advance for various conditions can provide decisionmakers an important tool to make decisions on the most appropriate protective action (evacuation, sheltering, or sheltering followed by later relocation) to minimize exposures to the population.

Q29. What was the basis for the Staff's conclusion in Appendix G, Section 4.0, of the SSER, in light of the items requiring resolution discussed above, identified in the SSER as G.1, G.2, E.1, E.2, and I.1, I.2, I.3 and I.4?

A29. (Rohrer) As set forth in Appendix G, Section 4.0 of the CPSES SSER No. 3, the Staff concludes that:

... satisfactory resolution of those items identified in Section 3.0 of this appendix of the Safety Evaluation Report and the verification of the adequacy of the applicant's implementation of their emergency preparedness program by the staff, will provide an adequate planning basis for an acceptable state of emergency preparedness and will meet the requirements of 10 CFR Part 50 and Appendix E thereto (emphasis added).

Thus, these items must be resolved before the Staff can finally determine that the Applicants' Emergency Plan will meet the requirements of 10 C.F.R. Part 50 and Appendix E thereto.

Q.30. Have you read, and are you familiar with a March 22, 1983 Memorandum from Richard W. Krimm, Assistant Associate Director, Office of Natural and Technological Hazards, Federal Emergency Management Agency ("FEMA") to Edward L. Jordan, Director, Division of Emergency Preparedness and Engineering Response, Office of Inspection and Enforcement, NRC, entitled, "Comanche Peak Testimony Before ASLB, September 17, 1982"?

A.30. (Rohrer) Yes. I have reviewed this document, and I am familiar with it. A copy of the Memorandum is attached to this testimony.

Q.31. Have you considered this Memorandum in light of your previous written and oral testimony at the September 1982 hearing session, your supplemental oral testimony filed on March 30, 1983, SSER No. 3, and FEMA's Interim Findings for CPSES, dated September 29, 1982?

A.31. (Rohrer) Yes. I have reviewed and evaluated the March 22, 1983 Memorandum in conjunction with my previous testimony, and the above-referenced documents. I find that this Memorandum confirms the statement made in SSER 3, Appendix G, Section 5.0, regarding FEMA resolution of three open items concerning the State and County Plans. Therefore, the Memorandum provides an additional basis for SSER 3, Appendix G, Section 5.0, as well as my written supplemental testimony filed on March 30, 1983.

## BIOGRAPHICAL DATA

URBANIK II, Thomas

November 1982

Assistant Research Engineer, Texas Transportation Institute

Address/Phone: Transportation Operations Program  
Texas Transportation Institute  
Texas A&M University  
College Station, Texas 77843  
(713) 845-1535

### EDUCATION

Ph.D., Civil Engineering (Transportation), Texas A&M University, 1982  
M.S., Civil Engineering (Transportation), Purdue University, 1971  
B.S., Civil Engineering, Syracuse University, 1969  
B.S., Forest Engineering, State University of New York, 1968

### PROFESSIONAL POSITIONS

Assistant Research Engineer, Texas Transportation Institute, Texas A&M University, 1977 to Present.  
Lecturer, Civil Engineering, Texas A&M University, 1982 to present.  
Traffic Engineer, City of Ann Arbor, Ann Arbor, Michigan, 1972-1976.  
Transportation Planning Engineer, City of Ann Arbor, Ann Arbor, Michigan, 1971-1972.  
Research Assistant, Joint Highway Research Project, Purdue University, 1970-1971.

### PROFESSIONAL LICENSES

Registered Professional Engineer, Texas and Michigan

### MEMBERSHIPS

American Society of Civil Engineers  
Institute of Transportation Engineers  
Sigma Xi  
Chi Epsilon

### EXPERIENCE

Principal person responsible for the evaluation of evacuation time estimates for the Nuclear Regulatory Commission. Work includes review of all evacuation time estimate submittals and the preparation of recommendations for revisions. Principal investigator on a study to develop a technique for relating traffic delay to traffic volume for statewide planning in Texas.

Principal investigator on several studies concerning public transportation planning at the state and local levels. Areas include general transit, intercity bus service, rural public transportation, elderly and handicapped transportation, and priority treatment of freeways and arterial streets. Other transportation planning studies include hurricane evacuation, nuclear evacuation and truck routing for hazardous materials.

Responsible to Director of Streets, Traffic and Parking, Ann Arbor, Michigan. Responsible supervisory and professional traffic engineering work in directing the traffic engineering function of the department. Work involved responsibility for the application of professional engineering skill and knowledge to difficult traffic engineering problems in traffic regulation and control, street use, street lighting, geometrics, parking, school safety, curb cuts, and related traffic engineering activities. Was directly responsible for the supervision of the traffic signal and traffic sign maintenance personnel.

Responsible to Director of Traffic Engineering and Transportation, Ann Arbor, Michigan. Reviewed transportation aspects of all plans for development in the city. Staff member to the Ann Arbor Transportation Authority responsible for budget and union negotiations. Staff Coordinator for the planning, design, implementation, and operation of the Dial-A-Ride demand-responsive demonstration project.

Under general direction of Dr. Kenneth W. Heathington, Purdue University, designed attitudinal questionnaire concerning public transportation for a home interview survey Lafayette, Indiana. Also analyzed survey results for inclusion in a report which was the basis for improving public transportation in Lafayette.

#### SIGNIFICANT REPORTS AND PUBLICATIONS

##### *Traffic Engineering*

Urbanik, T., Priority Treatment of Buses at Traffic Signals. Transportation Engineering, November 1977.

Urbanik, T. and R.W. Holder, Priority Treatment of High Occupancy Vehicles on Arterial Streets. Texas Transportation Institute, Report 205-5, July 1977.

Urbanik, T. and R.W. Holder, Evaluation of Alternative Concepts for Priority Use of Urban Freeways in Texas. Texas Transportation Institute, March 1977.

K.W. Heathington and T. Urbanik, Driver Information Systems for Highway-Railway Grade Crossings. Highway Research Record Number 414, 1972.

##### *Evacuation Planning*

M.P. Moeller, T. Urbanik, and A.E. Desrosiers, CLEAR (Calculates Logical Evacuation And Response). A Generic Transportation Network Model for The Calculation of Evacuation Time Estimates, U.S. Nuclear Regulatory Commission, NUREG/CR-2504, October 1981.

M.P. Moeller, T. Urbanik, M.A. McClean and A.E. Desrosiers, An Independent Assessment of Evacuation Times For A Peak Population Scenario in the Emerging Planning Zone of the Seabrook Nuclear Power Station, U.S. Nuclear Regulatory Commission, NUREG/CR-2903, August 1982.

Urbanik, T., et al., Analysis of Techniques for Estimating Evacuation Times for Emergency Planning Zones, U.S. Nuclear Regulatory Commission, NUREG/CR-1745, November 1980.

Urbanik, T., Analysis of Evacuation Times Around 52 Nuclear Power Plant Sites. U.S. Nuclear Regulatory Commission, NUREG/CR-1856 Volume 1, October 1980.

Urbanik, T., Hurricane Evacuation Demand and Capacity Estimation. Florida Sea Grant College, Report Number 33, April 1980.

Urbanik, T., Texas Hurricane Evacuation Study. Texas Transportation Institute, September 1978.

#### *Public Transportation*

Urbanik, T., et al., The Intercity Bus Industry in the U.S. and Texas, Transportation Institute, Technical Report 0965-IF, August 1981.

Urbanik, T., Bryan-College Station Energy Contingency Study. Texas Transportation Institute, August 1980.

Urbanik, T., Bryan-College Station Transit Improvement Plan. Texas Transportation Institute, September 1979.

Urbanik, T., et al., Ann Arbor Dial-A-Ride Project Final Report, Ann Arbor Transportation Authority, April 1973.

Urbanik, T., Ann Arbor Dial-A-Ride Operations, Highway Research Board Special Report 136, 1973.

Urbanik, T., et al., The Greater Lafayette Area Bus Transit Study. Joint Highway Research Project, Purdue University, April 1971.

#### *Elderly and Handicapped Transportation*

Bullard, D.L. and T. Urbanik, Evaluation of Selected Human Services Transportation Providers. Texas Transportation Institute, August 1980.

Urbanik, T. and Jose' A. Soegaard, Cost-Effectiveness of Accessible Fixed-Route Buses in Texas. Texas Transportation Institute, Technical Report 1061-1F, September 1979.

Urbanik, T. and Jose' A. Soegaard, Transportation of the Elderly and Handicapped in Texas: A Case Study. Texas Transportation Institute, Technical Report 1056-2F, September 1979.

Urbanik, T., Total Accessibility Versus Equivalent Mobility of the Handicapped. Institute of Transportation Engineers, Compendium of Technical Papers, 49th Annual Meeting, 1979.

Urbanik, T., et al., Survey of Vehicles and Equipment for Elderly and Handicapped Transportation. Texas Transportation Institute, Technical Report 1056-1, September 1978.

Urbanik, T. and R.W. Holder, Corpus Christi Elderly and Handicapped Transportation Study. Texas Transportation Institute, September 1978.

**EXPERT WITNESS**

Presented expert testimony before the Atomic Safety and Licensing Board, U.S. Nuclear Regulatory Commission, concerning evacuation times at several nuclear power plant sites including Three-Mile Island, Diablo Canyon and Indian Point.



# Federal Emergency Management Agency

Washington, D.C. 20472

MAR 22 1983

MEMORANDUM FOR: Edward L. Jordan  
Director, Division of Emergency Preparedness  
and Engineering Response  
Office of Inspections and Enforcement  
U.S. Nuclear Regulatory Commission

FROM:   
Richard W. Krimm  
Assistant Associate Director  
Office of Natural and Technological Hazards

SUBJECT: Comanche Peak Testimony Before ASLB, September 17, 1982

This memorandum is in response to a telephone request by Mr. David M. Rohrer, of your organization, concerning disposition of three areas of unresolved Federal Emergency Management Agency (FEMA) testimony resulting from Atomic Safety and Licensing Board (ASLB) hearings held September 17, 1982, in Fort Worth, Texas, on Comanche Peak.

FEMA Region VI has confirmed that the three areas of concern have been satisfactorily resolved as follows.

1. The first area of concern is on page 5709 of the transcript from the ASLB hearings. It concerns testimony that the State plan did not reflect that a letter had been obtained from Hood County Hospital agreeing to treat individuals injured onsite at Comanche Peak. Also, the plan did not indicate that Hood County Hospital was a county-owned hospital. (Testimony at the hearing by State personnel reflected that Hood County Hospital is indeed a county-owned hospital and, as such, letters of agreement were not needed.)

The State has since changed its State plan to reflect that Hood County Hospital is a county-owned hospital and, as such, letters of agreement are not required.

2. The second area of concern is on pages 5715-16 of the transcript of the ASLB hearings. It concerns the fact that the State plan did not contain a satisfactory list of hospitals with capabilities to treat radiological contaminated persons.

Since the hearings, the State has incorporated a list of hospitals capable of treating radiological contaminated persons in the plan.

3. The third area of concern is on pages 5717-18 of the transcript from the ASLB hearings. It concerns the fact that the county plans (Hood and Somervell) did not have letters of agreement from ambulance companies that would assist Comanche Peak in case of an accident.

Ambulance service for Comanche Peak will be provided by county-owned ambulances and, as such, will not require letters of agreement.

I trust that this information will be useful in closing out the NRC Safety Evaluation Report.

I would prefer that this type of request be sent in writing to me rather than direct to the FEMA Region.