

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

November 22, 1974

Mr. Sherwood Davies
New York State Department
of Health
345 Central Avenue
Albany, New York 12206

Dear Mr. Davies:

The U.S. Atomic Energy Commission, under a Notice of Interagency Responsibilities published in the Federal Register on January 24th, 1973, was designated by the Federal Office of Emergency Preparedness (now Office of Preparedness, General Services Administration and Federal Disaster Assistance Administration, Housing and Urban Development) as the "lead agency" in nuclear incident emergency planning activities among Federal agencies and for Federal assistance to State and local governments in developing radiological emergency response plans in support of fixed nuclear facilities. As a part of meeting this responsibility, the AEC published an interim "Guide and Checklist for the Development and Evaluation of State Radiological Emergency Response Plans for Fixed Nuclear Facilities" on November 16, 1973. This document has recently been undergoing revision and is scheduled for promulgation soon. The basic thrust of the Interim Guide and Checklist is essentially preserved and clarified in the revised version. A copy of the revised version will be sent to you as soon as it becomes available.

In conjunction with our responsibility, we have reviewed the following radiological emergency response planning documents from the State of New York which we currently have on file.

1. New York State Emergency Plan for Major Radiation Accidents Involving Nuclear Facilities, dated August 1972.
2. New York State Department of Health, Bureau of Radiological Health, Specific Operating Procedures for Brookhaven National Laboratory Site, dated October 1973.
3. New York State Department of Health, Bureau of Radiological Health, Specific Operating Procedures for Nine Mile Point.
4. New York State Plan for Coordination of Natural Disaster Assistance, Department of Transportation, July 1971.

October 22, 1974

In reviewing the above listed radiological emergency response plans for New York, we are of the opinion that, although a good start has been made, major improvements are necessary in several areas. For example, it is difficult to determine who is in charge of response operations at any given time. There also appears to be a lack of coordination between the many involved State and local agencies. Too much reliance appears to be made on telephone contacts between various groups before definitive actions can be taken.

We also believe the emergency plans, as written, do not provide the guidance necessary to allow a timely and effective response to a radiological emergency by State and local authorities. There does not appear to be a clear "concept of operations".

We believe that a State and local emergency plan should be synchronized with the licensee's emergency plan. AEC regulations specify certain requirements relative to emergency planning which must be met by nuclear facility licensees. State and local government emergency plans must interface clearly with the licensee's plans in a number of areas as outlined in the AEC "Guide and Checklist". We would, therefore, suggest that you review your planning documents against the planning elements in the "Guide and Checklist" and consider expanding the sections which are deficient and addressing those which are absent.

Of additional interest to you may be the fact that the new Federal Disaster Assistance Act of 1974 (93-283) signed into law on May 22d of this year, provides for \$250,000 non-matching planning grants to each State for the development of plans, programs and capabilities for disaster preparedness and prevention. Radiological emergency response planning may be considered to be a part of this program and your appropriate State agency may wish to inquire about the availability of such funds from the Federal Disaster Assistance Administration Regional Director in your area.

As you continue to develop your plans, we stand ready to support you with advice, guidance and such other assistance that we may be able to render. We are prepared, upon your request, to send a field cadre to New York for a few days to assist your State organizations (in whatever way you think appropriate) in the development of your radiological emergency response plan. If you desire this help, please contact us. We also will be pleased to review later versions of your plans as they become available.

Sincerely,

/s/

Harold R. Collins
Emergency Preparedness
Office of Government Liaison -
Regulation
Telephone 301-973-7794