



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

Sensitive

August 20, 1981

Note to Boyce Grier

Here is the FEMA letter on the New York plants. Please draft letters to the New York utilities enclosing the FEMA letter and saying this resolves your earlier April 22 letter. Do not send the letters until we have reviewed them as Vic has not decided whether the Commission should see them first.

Brian K. Grimes, Director
Division of Emergency Preparedness
Office of Inspection and Enforcement



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19106

4-20-11-14

August 21, 1981

MEMORANDUM FOR: Brian K. Grimes, Director
Division of Emergency Preparedness

FROM: Boyce H. Grier, Director
Region I

SUBJECT: FEMA LETTER DATED AUGUST 19, 1981

In your facsimile transmission dated August 20, 1981, you asked for a draft letter to the New York Utilities transmitting the FEMA letter dated August 19, 1981 to them. You stated that the transmittal letter should say that, "this resolves your earlier April 22 (sic) letter."

The FEMA letter may be an adequate basis for not requiring reactor shutdown and for not taking enforcement action at this time, but I believe that it is far from resolving the concerns in our April 24 letter and the attachments thereto. Enclosed is a draft letter which places things in their proper perspective.

Boyce H. Grier
Boyce H. Grier
Director

Enclosure:
Draft letter dated 8/21/81

cc w/enclosure:
Sheldon Schwartz, DD, EP

8112310530

DRAFT

(Licensee)

By letter dated April 24, 1981, I transmitted to you a copy of a letter from the Federal Emergency Management Agency (FEMA) dated April 23, 1981 and its attached letter from FEMA to the New York State Disaster Preparedness Commission dated April 6, 1981. The attachments to the April 6 letter listed numerous deficiencies in the New York State and local emergency response plans for the area around your reactor site.

The enclosed letter from FEMA dated August 19, 1981, refers to the deficiencies in the aforementioned April 6, 1981 letter. FEMA expresses their belief that pending the evaluation of exercise results, present State and local emergency planning is adequate. Based on actual progress correcting deficiencies and your apparent good faith efforts to continue to do so, no enforcement action is intended at this time. Nonetheless, the NRC cannot judge emergency preparedness as being adequate at your facility until: the Emergency Plan Implementation Appraisal has been completed; facility, State and local emergency plans have been reviewed; a full-scale exercise has been conducted; and deficiencies which have been identified in each of these areas have been corrected.

Sincerely,

Boyce H. Grier
Director

Enclosure:
As stated



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

August 24, 1981

Gentlemen:

By letter dated April 24, 1981, I transmitted to you a copy of a letter from the Federal Emergency Management Agency (FEMA) dated April 23, 1981 and its attached letter from FEMA to the New York State Disaster Preparedness Commission dated April 6, 1981. The attachments to the April 6, 1981 letter listed numerous deficiencies in the New York State and local emergency response plans for the area around your reactor site.

The enclosed letter from FEMA dated August 19, 1981, refers to the deficiencies in the aforementioned April 6, 1981 letter. FEMA concludes that "the present state of planning is generally adequate to carry out the responsibilities of the State and local government in the case of an accident at these sites". We therefore conclude that this issue has been resolved satisfactorily.

Sincerely,

Original signed by:

Boyce H. Grier
Director

Enclosure: As Stated

Addressees:

Power Authority of the State of New York
James A. FitzPatrick Nuclear Power Plant/
Indian Point 3 Nuclear Power Plant
ATTN: Mr. George T. Berry
President and Chief Operating Officer
10 Columbus Circle
New York, New York 10019

Niagara Mohawk Power Corp. (Nine Mile Point)
ATTN: Mr. T. E. Lemppes
Vice President
Nuclear Generation
300 Erie Boulevard West
Syracuse, New York 13202

Rochester Gas and Electric Corp. (Gina)
ATTN: Mr. John E. Maier
Vice President
Electric and Steam Production
89 East Avenue
Rochester, New York 14649

Consolidated Edison Company of New York, Inc.
Indian Point 2
ATTN: Mr. John D. O'Toole
Vice President - Nuclear
Engineering and Quality Assurance
4 Irving Place
New York, New York 10003

8109100393



Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

September 29, 1981

Mr. William C. Hennessy, Chairman
Disaster Preparedness Commission
State of New York
Public Security Building
State Campus
Albany, New York 12226

Dear Mr. Hennessy:

Attached to this letter, please find the Post-Exercise Assessment for your September 1, 1981 Nine-Mile Point Exercise, and the Regional Assistance Committee's (RAC) review comments for the Radiological Emergency Preparedness (REP) Plan for Nine-Mile Point.

It should be noted that the RAC comments were made prior to the September 15th exercise. Therefore, many comments have been addressed during the exercise and the REP Plan should be altered accordingly. Concurrently, new deficiencies were apparent or more pronounced during the exercise and will require careful review and correction by New York State.

Although the REP Plan has been improved since the submission of the draft document this year, and comments and deficiencies listed in our letters to your office dated April 6, 1981 and May 1, 1981 have been addressed, it is still the determination of the RAC through their review that a number of criteria are still inadequate according to FEMA REP-1/NYREG-0654.

In summary, deficiencies in the plan fall in the following areas:

(a) Assignment of Responsibility

The State and Oswego County Plans still do not reflect the latest legislation on authorities. It is our understanding that your office is presently making these changes. It was also noted that during the exercise assignment of responsibility was successfully demonstrated at the State and county level.

(b) Training

Within the Plan, there are several instances where it is evident that personnel require extensive training. Yet, no time commitments for training are indicated. A specific deadline for completion of initial training should be included in each plan. A deadline should also be indicated for acquisition of monitoring instrumentation and communications equipment where these are not yet in place. The exercise demonstrated that training must be enhanced at the local level. This was supported by a number of observations by Federal observers.

Mr. William C. Hennessy
September 29, 1981

(c) Accident Assessment

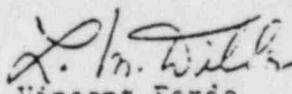
NRC and EPA believe more detailed information is required in this section to assure the State and county's ability to complete an accident assessment. Observations made during the exercise support the need for clarification in the accident assessment portions of the plan. There was almost no field monitoring capability demonstrated. In cases where there was, the lack of sufficient training was evident.

- (d) The format of the State and County Plan has been improved over that of previous submissions. However, under emergency conditions, it will be difficult to implement because of its bulk and complex referencing.

The detailed comments that the RAC has provided, coupled with a meeting you may request to discuss these comments, should serve to identify the revisions necessary in the REP Plan.

The Post-Exercise assessment report is furnished for your information, guidance and appropriate action. Your attention is invited to Page 5, Remedial Action Procedures. Please provide this office, within twenty calendar days of this letter, your schedule of remedial actions for correcting deficiencies on the formal recommendations contained in the report and the deficiencies listed by the RAC on the REP Plan itself.

Sincerely,

for 
Vincent Forde
Acting Regional Director

Enclosures

II. EXECUTIVE SUMMARY

The consensus of the 24-member Federal Observer Team indicated that the objectives of the exercise were generally achieved, which were to assess the State and local response capability to protect the public in the event of a radiological emergency at the Nine Mile Point Nuclear Station (NMPNS) in accordance with the New York and Oswego County Radiological Emergency Response plans. However, because of the slender magnitude and short duration of the radiological release, the scenario did not require or result in a full demonstration of the offsite response capability.

The exercise focused on the State and local offsite response as well as the onsite response by the NMPNS. The NMPNS provided appropriate interface with the State and County both by issuing notifications of the simulated emergency event classes and releases and through the operation of its Emergency Operations Facility (EOF). The onsite response is not covered in this evaluation with the exception of the State-local coordination and interface functions at the NMPNS EOF.

The exercise demonstrated a mixed offsite capability to protect the public in the event of a radiological emergency at the NMPNS. In some observable areas, the demonstrated capability ranged from acceptable to above minimum standards, while in other areas, the capability was weak and/or not demonstrated.

In general, the State and local Emergency Operation Center (EOC) facilities and equipment, as well as the emergency management activities (e.g., direction and control and decision making) exceeded minimum standards. However, activities to gather radiological information (monitoring), as well as to implement notification and protective actions were generally weak or not demonstrated. As a result of these deficiencies, it is questionable as to whether or not the public in the area near the NMPNS could be protected if an actual emergency occurred.

Highlights of the observations follow:

Positive observations include:

- Professionalism and dedication by the officials and staff participating at the State and local levels.

- Sincere effort by most of those local emergency personnel (many of whom are volunteers) who did report and participate.
- Well designed and equipped State and County EOC facilities.
- An excellent Media Center that provided good facilities for the press and media.
- Generally effective emergency management operations within the State and County EOCs.

Areas of deficiencies noted by observers include:

- Lack of training on the part of most of the local emergency response personnel.
- Poor or lack of demonstration of radiological monitoring, exposure control, decontamination, and access control measures.
- Failure to adequately mobilize response resources because of the extensive involvement of volunteers having other normal workday commitments, ostensibly because this was an exercise and not a real emergency.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

2 SEP 1981

10/11/81-REV 2-11-81

J...

NRC/FEMA News Release on Status of Off-Site Planning in New York State

Joyce Feldman
Joyce Feldman
Regional Radiation Representative

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2/5/81

Ihor Husar
RAC Chairman

The attached news release arrived recently as a routine mailing from...
The conclusions stated in the FEMA memo to NRC (August 19, 1981) are confirmed by the most recently submitted versions of the State/local emergency plans which we have received.

N/C

In a conference call on July 27, 1981 involving EPA and FEMA Regional staff members the continued conflict in direction and control (evident in the prior drafts of the NYS/local government plans) present in the formal submission of the NYS/Oswego plan was discussed at length. At that time it was agreed that the deficiency in this area had not been resolved.

In additional conversations during that week, the major problem of the county's inability to perform the indicated assignments due to the present lack of equipment and trained radiological emergency personnel was also recognized.

A cursory examination of the plans submitted for Ginna and Indian Point indicates that these major deficiencies are present, in varying degrees, in all three plans.

If a more recent formal submission to FEMA has corrected all the previously identified inadequacies, please forward a copy to this office so that we may review the appropriate version.

As was discussed by telephone and confirmed by our subsequent formal review comments (August 26, 1981), the "inconsistencies in direction and control" were only one of the major inadequacies of the plan. If no new version is submitted, I would appreciate an explanation of the justifications for the finding by FEMA that "the present state of planning is generally adequate to carry out the responsibilities of the State and local government in case of an accident..."

cc: Jan Geiselman
Harry Calley/Ken Travis
Ron Bernacki
Tom Elsasser
Leroy Martin

24 SEP 1981

TO: Review of Interim Critique of Exercise at Nine-Mile Point

FROM: *Joyce Feldman*
Joyce Feldman
Regional Radiation Representative

TO: Thor W. Husar
RAC Chairman

We have reviewed the FEMA critique of the exercise at Nine-Mile Point Nuclear Generating Station, September 15, 1981. The additional comments presented below are prompted by the recognition that many aspects of the exercise, while subtle, were not evaluated in the form used by FEMA. The basic question of whether an emergency could be adequately handled has not been answered in this case for two reasons: (1) the scenario was not designed to provide an appropriate test of the plan, and (2) too many participants reacted as if they had extensive knowledge of the planned scenario.

Specific comments follow.

- I. Emergency Operations, Facilities and Resources.
 II. Alerting and Mobilization of Officials and Staff.
 No additional comments on I and II.

III. Emergency Operations Management

State - Monitoring teams do not report to the State, but to the County. Therefore, the comment, "more play between all monitoring teams and State EOC appears to be needed" should be revised to read that more evidence of monitoring activity should be established through appropriate reporting channels.

County - Implementation of protective actions was apparently premature; however, once the decision was made it was carried out very efficiently. There were no monitoring activities performed by local response organizations due to the structure of scenario. Monitoring teams were on standby two hours before the scripted release, but were inadequately trained for their roles and unfamiliar with their radiological instruments.

- IV. Public Alerting and Notification.
 No additional comments on IV.

V. Public and Media Relations

EOF - It is probably preferable to have stock press releases on hand to be filled in with the appropriate data rather than try to create them during an emergency.

VI. Accident Assessment

EOF - The NFO liaison officer at the County EOC provided excellent coordination on accident assessment and protective action decision making. The plan does not call for the State to participate in field monitoring unless the Governor declares that an emergency state exists. There was no field data to be obtained by the county monitoring teams to be passed on

to the EOF due to the inadequacy of the scenario in this area. However, the field team(s) which did report scant data did not do so in a timely manner. Even data reports indicating background readings are important in planning for evacuation or sheltering.

VII. Actions to Protect the Public.

VIII. Health, Medical and Exposure Control Measures.

The lead responsibility for these areas lies with the County. However, State EOC observations revealed that State personnel were providing good support for County decisionmaking.

County - There was not a "token demonstration of access control measures." Observers were shown the facilities that might be used at the County EOC for decontamination purposes. The arrangement observed was inadequate at the present time.

IX. Recovery and Reentry Operations.

County - Activity within the EOC was excellent; however, the simulation did not extend to notifying field teams of actions being taken.

X. Relevance of the Exercise Experience - Additional Comment.

Based on the results of this exercise, it has not been established that at this time the capability for dealing with a radiological emergency is present.

cc: Ken Travis/Harry Calley
 RAC Members -
 Ron Bernacki
 Tom Elsasser