

EMERGENCY PREPAREDNESS EVALUATION REPORT

BY THE

DIVISION OF EMERGENCY PREPAREDNESS
OFFICE OF INSPECTION AND ENFORCEMENT
U. S. NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

NINE MILE POINT NUCLEAR STATION

DOCKET NO. 50-220

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INTRODUCTION

The Niagara Mohawk Power Corporation filed with the Nuclear Regulatory Commission revisions to the Nine Mile Point Emergency Plan dated December 30, 1980 and March 10, 1981.

The plan was reviewed against the sixteen planning standards in Section 50.47 of 10 CFR Part 50, the requirements of Appendix E to 10 CFR Part 50, and the criteria of NUREG-0654/FEMA-REP-1, Revision 1 entitled "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.

This evaluation report follows the format of Part II of NUREG-0654 in that each of the Planning Standards is listed and followed by a summary of the applicable portions of the plan and the deficiencies that relate to that specific standard. The final section of this report provides our conclusions.

A separate report will be issued describing the findings and determinations of the Federal Emergency Management Agency on the State and local emergency response plans.

EVALUATION

A. ASSIGNMENT OF RESPONSIBILITY (ORGANIZATIONAL CONTROL)

Planning Standard

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.

Emergency Plan:

- ° The Federal, State, local and private sector organizations that are intended to be part of the overall response organization for Emergency Planning Zones are identified. Federal support is provided by NRC and DOE (through RMAP). The role of the State of New York, particularly the Department of Health, is described, and reference is made to the New York State Radiological Emergency Preparedness Plan. Local aid is available through the Oswego County Office of Emergency Preparedness, as described in the Oswego County Radiological Emergency Response Plan. Private sector support is provided by INPO, General Electric, J.A. Fitzpatrick Nuclear Power Plant and R.E. Ginna Nuclear Station.

- ° The concept of operations and its relationship to the total effort are described and a block diagram showing the interfaces between and among the principal response organizations is provided.
- ° The Station Shift Supervisor shall assume the role of Emergency Director until relieved by the General Superintendent or a designated alternate. The Emergency Director shall have full responsibility for the implementation and administration of the Emergency Plan.
- ° The Licensee will provide for 24-hour per day emergency response, including 24-hour per day manning of the communication links.
- ° 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 EPZ's are included. Organizations included are: U.S. Coast Guard, U.S. DOE Brookhaven Area Office, Power Authority of the State of New York, State University of New York-Upstate Medical Center, New York State Department of Health, Oswego County Sheriff, Oswego County Office of Emergency Preparedness, City of Oswego Department of Public Safety, and several local volunteer fire-fighting organizations.
- ° The Licensee is capable of continuous (24-hour) operations for a protracted period. The individual responsible for assuring continuity of resources is the Station Emergency Director until relieved of this responsibility by the Corporate Emergency Director/Recovery Manager.

B. ONSITE EMERGENCY ORGANIZATION

Planning Standard

On-shift facility licensee responsibilities for emergency response are unambiguously defined, adequate staffing to provide initial facility accident response in key functional areas is maintained at all times, timely augmentation of response capabilities is available, and the interfaces among various onsite response activities and offsite support and response activities are specified.

Emergency Plan

- ° The onsite emergency organization of plant personnel for all shifts and its relation to the responsibilities and duties of the normal staff complement are specified.
- ° The Emergency Director is designated as the individual with the authority to direct and coordinate emergency actions.
- ° A line of succession for the Emergency Director has been established.
- ° The functional responsibilities of the Emergency Director are established and the responsibilities that may not be delegated are clearly specified.
- ° The interfaces between and among the onsite functional areas of emergency activity, licensee headquarters support, local services support, and State

and local government response organization are identified.

- ° The corporate management, administrative and technical support personnel who will augment the plant staff are specified. Logistics support is provided by the Administrative/Logistics Manager (Oswego District Manager); technical support is given by the Technical Liaison and Advisory Manager (Vice President for Engineering); management level interface with governmental authorities is provided by the Corporate Emergency Director/Recovery Manager (Vice President Nuclear Generation); and release of information to the news media is given by the Public Relations Emergency News Center Director (Manager, Public Affairs and Corporate Communication).
- ° The contractor and private organizations who may be requested to provide technical assistance to and augmentation of the emergency organization are specified. Organizations listed include INPO, General Electric, J.A. FitzPatrick Nuclear Power Plant and R.E. Ginna Nuclear Station.
- ° The services to be provided by local agencies for handling emergencies, including fire-fighting and medical services are identified. Copies of letters of agreement are appended to the plan.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Upon arrival of the Corporate Emergency Director/Recovery Manager at the

station, it is not clear as to whether he or the Station Emergency Director has the overall responsibility for the direction and control of the integrated emergency response effort. Section 5.2.1 of the plan indicates that the Station Emergency Director "shall retain overall responsibility for the implementation and administration of the Emergency Plan" whereas Section 9.1 indicates that "the Corporate Emergency Director replaces the site Emergency Director as the individual with overall responsibility for control of the emergency situation." Revise the appropriate portions of the plan to correct this apparent inconsistency. It is also recommended that the title Emergency Director be used for only one position in the emergency organization at any given time in order to alleviate any potential confusion.

2. The description of the emergency organization staffing in the plan differs so greatly from that set forth in Table B-1 of NUREG-0654, that a valid comparison between the two cannot be made. Provide a revised format equivalent to Table B-1 of NUREG-0654. If the minimum on-shift complement and the 30 and 60 minute staffing requirements are deficient with respect to the aforementioned table, provide a commitment to meet the minimum staffing requirements in accordance with the schedule set forth in evaluation criteria B.5 of NUREG-0654.
3. The various support services to be provided by the private sector (General Electric, R.E. Ginna Station, INPO) should be supported by written agreements and appended to the plan. These agreements should contain the information set forth in criteria B.9 of NUREG-0654.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

Planning Standard

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.

Emergency Plan:

- ° Federal assistance can be requested by the Emergency Director, by the Oswego County Director of Emergency Preparedness or by the Director of the New York State Department of Health.
- ° The expected Federal resources are specified, including those available through the Federal Radiological Monitoring and Assessment Plan.
- ° Resources available to support the Federal response are described.
- ° A representative from the licensee will be dispatched to the Oswego County EOC to act as liaison between the County and the site for a Site or General Emergency.
- ° Radiological laboratories are identified at the J.A. FitzPatrick Nuclear Power Plant and at the R.E. Ginna Nuclear Station.

° Nuclear and other facilities and organizations which can be relied upon in an emergency to provide assistance, including fire-fighting, medical and radiation-management capabilities, are identified. Letters of agreement are appended to the plan.

D. EMERGENCY CLASSIFICATION SYSTEM

Planning Standard

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 offsite response measures.

Emergency Plan:

- ° The licensee has established an emergency classification scheme in accordance with that set forth in Appendix 1 to NUREG-0654.
- ° The licensee has established 30 initiating conditions which are essentially a general classification for events that could initiate one of the four emergency classes. The specific initiating conditions listed in Appendix 1 to NUREG-0654 have been addressed as well as those associated with the postulated accidents analyzed in the Final Safety Analysis Report.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Establish Emergency Action Levels (EALs) for each initiating condition specified in Appendix 1 to NUREG-0654. The EALs should be observables

(e.g., instrument readings, equipment status indications, alarm annunciators) which are both necessary and sufficient to explicitly and uniquely characterize each initiating condition. It is recommended that the format be in tabular form for each of the four emergency classes which lists the initiating conditions and specifies the EALs for each condition.

E. NOTIFICATION METHODS AND PROCEDURES

Planning Standard

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 followup messages to response organizations and to 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.

Emergency Plan:

- ° Procedures which describe mutually agreeable bases for notification of response organizations consistent with the emergency classification scheme, including means for verification, are established.
- ° Procedures for alerting, notifying and mobilizing emergency response personnel are established.
- ° The contents of the initial emergency messages to be sent from the plant are established.
- ° Followup messages from the facility to offsite authorities, containing appropriate information, are established.

- ° The Oswego County Office of Emergency Preparedness has the responsibility for promptly notifying and instructing the population within the plume exposure pathway EPZ.
- ° Written messages to the public, which give instructions with regards to specific protective actions to be taken by occupants of affected areas, have been prepared by local agencies. Such messages include the appropriate aspects of sheltering and evacuation. The licensee will provide supporting information for these messages as necessary.

DEFICIENCIES:

The following requires revision and/or additional information as follows:

1. Provide a complete description of the administrative and physical means for prompt alerting and notification of the public within the plume exposure pathway EPZ. Sufficient detail should be provided for evaluation against the criteria set forth in Appendix 3 to NUREG-0654. Include a schedule through operational readiness for the overall system.
2. The notification time to offsite authorities for the Unusual Event class should be the same as for the other emergency categories rather than one hour as indicated in the plan.

F. EMERGENCY COMMUNICATIONS

Planning Standard

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

Emergency Plan:

- ° 24-hour notification to and activation of the State/local emergency response network are provided.
- ° Communications with State/local governments within the EPZ's are provided.
- ° Communications as needed with Federal emergency response organizations are provided.
- ° Communications between the nuclear facility, State and local EOC's and radiological monitoring teams are provided.
- ° Provisions are made for alerting or activating emergency response personnel.
- ° Communication by the licensee with NRC headquarters and the NRC Regional Office is provided.
- ° Provision is made for a coordinated communication link between the licensee

and the fixed and mobile medical support facilities.

- ° Periodic testing of the communications links is provided.

DEFICIENCIES:

1. Specify the organizational titles and alternates for both ends of the communication links which would be involved in initiating emergency response actions.

2. A diverse means of communication, such as a radio system, should be available between the site and the primary offsite response agency. It is not clear that such radio communications are available with the Oswego County Emergency Operations Center.

G. PUBLIC EDUCATION AND INFORMATION

Planning Standard

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.

Emergency Plan:

- ° A coordinated yearly dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency is provided. The appropriate information is included.
- ° Provisions are made for written material that is likely to be available in a residence during an emergency and for written material that is likely to be available to any transient population.
- ° The points of contact and physical locations for use by news media during an emergency (Emergency News Center) are designated.

- ° Space will be provided at the licensee's EOF for a limited number of the news media at appropriate times, such as media briefings.
- ° The Emergency Director of Public Information is designated as the licensee's spokesperson.
- ° Arrangements for timely exchange of information among designated spokespersons at the EOF and the Emergency News Center are established.
- ° Provisions have been made for coordinated arrangements for dealing with rumors.
- ° Annual programs to acquaint news media with the emergency plans, information concerning radiation and points of contact for release of public information in an emergency are provided.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Provide a sample copy of the emergency preparedness information which will be provided for both the resident and transient population around the site.

H. EMERGENCY FACILITIES AND EQUIPMENT

Planning Standard

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

Emergency Plan:

- ° A Technical Support Center (TSC) and an Operation Support Center (OSC) have been established in the administration building training and lunch rooms respectively. A primary Emergency Operations Facility (EOF) has been established at the company's Energy Information Center. A backup EOF is located at the Company Service Center in Oswego.
- ° Onsite monitoring systems which will be used for initiating emergency measures have been established including geophysical phenomena monitors, radiation monitors, and fire and combustion product detectors.
- ° Provisions have been made to acquire data from offsite monitoring and analysis equipment including radiological monitors in the plant environs, as well as access to the laboratory facilities at both the J.A. Fitzpatrick and Ginna nuclear power plants.

- ° The current meteorological monitoring system meets the requirements for a Class A model and a new system is under design which will fulfil the technical requirements and implementation schedule in accordance with Appendix 2 of NUREG-0654. Backup meteorological data can be obtained from local weather stations, and the national weather stations in Syracuse and Buffalo.
- ° An Operations Support Center has been established with sufficient capacity and supplies for assigned personnel.
- ° Provisions have been made to inventory, inspect and operationally check emergency equipment/instruments each quarter and after each use. There are sufficient reserves to replace equipment/instruments removed for calibration or repair. Calibration is performed according to supplier recommendations.
- ° Contents of emergency kits are identified in an appendix to the plan.
- ° A control point for receipt and analysis of field monitoring data and coordination of sample media has been established. The initial control point will be the TSC and will be moved to the EOF when it becomes operational.

DEFICIENCIES:

The Plan requires revision and/or additional information as follows:

1. Provide a commitment and schedule for the permanent Emergency Response Facilities in accordance with NUREG-0696.
2. The Plan indicates that during off hours the TSC will be staffed in one hour, and the EOF will be activated in two hours and staffed in eight hours. The criteria for timely activation of these response facilities are discussed in NUREG-0696 which indicates that the TSC and EOF should be fully functional within 30 minutes and one hour respectively. Describe how these criteria will be met.
3. Identify the onsite monitors for obtaining hydrologic information which may be used for initiating emergency measures in accordance with criteria H.5.a of NUREG-0654.
4. Identify the onsite process monitoring systems in accordance with criteria H.5.c of NUREG-0654. The monitors identified should include those used for obtaining Emergency Action Levels for the appropriate initiating conditions listed in Appendix 1 to NUREG-0654. Include instrument identification, location, and range.
5. Describe your provisions for obtaining offsite information regarding hydrologic and seismic data as specified in criteria H.6.a of NUREG-0654.
6. Indicate that the Operations Support Center and equipment will include that specified in criteria H.9 of NUREG-0654.

I. ACCIDENT ASSESSMENT

Planning Standard

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

Emergency Plan:

- Plant systems and effluent parameter values characteristic of a spectrum of off normal conditions and accidents are identified including the example initiating conditions in Appendix 1 to NUREG-0654.
- The facility has the capabilities and resources necessary to provide initial values and continuing assessment throughout the course of an accident.
- Methods and techniques used for determining the magnitude of releases based on plant system parameters and effluent monitors are addressed.
- The licensee has the capability to acquire and evaluate meteorological information sufficient to meet the Class A model criteria in Appendix 2 of NUREG-0654 and transmit data to the TSC and EOF.

- ° The methodology for determining release rates/projected doses when instruments used for assessment are offscale or inoperable has been established.
- ° The licensee has the capability and resources to provide field monitoring within the plume EPZ using both in place assessment monitors and field monitoring teams. Field monitoring teams will be deployed within 30 to 60 minutes and will be provided with the required transport, communication and monitoring equipment including equipment capable of measuring radio-iodine concentration in the plume as low as 10^{-7} μ Ci/cc.
- ° Provisions have been made to estimate integrated dose from projected and actual dose rates and comparing these with the protective action guides.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. As part of the description regarding onsite capability and resources to provide initial and continuing assessment throughout the course of an accident, include post-accident sampling capability, radiation and effluent monitors, in-plant iodine instrumentation, and containment monitoring. Provide sufficient detail to enable evaluation against clarification items II.B.3, II.F.1, and III.D.3.3 in NUREG-0737.

2. Provide detailed information on the methods and techniques used for determining the source term of releases of radioactive material within plant systems. As an aid in assessing the extent of potential core damage include plots which show the containment radiation monitor reading vs. time following release of gap activity, 1% release of fuel inventory, and 10% release of fuel inventory.

3. Describe the means for relating measured field contamination levels to dose rates for applicable isotopes listed in Table 3 of NUREG-0654.

J. PROTECTIVE RESPONSE

Planning Standard

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.

Emergency Plan:

- ° The licensee has established the means and time (15 minutes) to warn or advise onsite individuals, including employees, visitors and contractor/ construction personnel.
- ° Evacuation routes including alternatives and suitable offsite assembly locations have been identified. Persons being evacuated will be expected to use personal transportation.
- ° Radiological monitoring will be provided for personnel evacuated from the site and will be available at both the primary and alternate assembly areas.
- ° The licensee has the capability to account for all onsite personnel within approximately 30 minutes following implementation of the accounting procedure.

- ° Respiratory protection, protective clothing, and radioprotective drugs for thyroid protection will be made available to emergency workers.
- ° Provision for recommending protective actions to State and local authorities is in accordance with Appendix 1 to NUREG-0654.
- ° The plan contains maps showing population distribution around the plant, evacuation areas in sector format, evacuation routes, and radiological sampling and monitoring points.
- ° The method that will be used to notify the general population of an actual or potential emergency is discussed.
- ° The bases for the choice of recommended protective actions from the plume exposure pathway is discussed.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Although the plan indicates that onsite personnel can be accounted for "within approximately 30 minutes following implementation of the accountability procedure", the capability should exist to accomplish this function within 30 minutes from the start of an emergency in order to meet criteria J.5 of NUREG-0654.

K. RADIOLOGICAL EXPOSURE CONTROL

Planning Standard

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.

Emergency Plan:

- ° Onsite exposure guidelines consistent with EPA Protective Action Guide 520/1-75/001 have been established for removal of injured personnel, corrective and assessment actions, first aid, personnel decontamination, medical transport, and medical treatment services.
- ° An onsite radiation protection program has been established for emergency situations including methods to implement exposure guidelines. The plan identifies the Emergency Director as the person authorized to approve emergency workers to exceed 10 CFR Part 20 exposure limits.
- ° The facility has 24 hours per day capability to determine radiation doses received by emergency workers. Provisions have been made for dosimeter distribution, processing and record maintenance.
- ° Action levels for decontamination of evacuated onsite personnel and vehicles, and the means for onsite waste disposal have been established.

- ° Contamination control measures have been established for area access, onsite food and potable water supplies.
- ° Provisions have been made for decontaminating relocated onsite personnel.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. The plan states that "Emergency Plan Implementing Procedures provide procedures for expeditious decision making and a reasonable consideration of relative risks." Identify these procedures by number and title, and include in Appendix C to the plan, or as an alternative provide a synopsis in the plan itself.
2. The plan specifies only the action levels for decontamination of evacuated onsite personnel and vehicles. Provide the action levels for decontamination of emergency workers, as well as onsite equipment and supplies. Include the quantitative criteria for permitting return of areas and items to normal use.
3. Describe the capability for decontaminating personnel evacuated to offsite locations including provisions for extra protective clothing and decontaminants suitable for the contamination expected with particular attention to radioiodine contamination of the skin. Discuss the provisions for waste disposal, if needed, at the remote assembly areas.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

Emergency Plan:

- ° Arrangements have been made for hospital and medical services having the appropriate capabilities.
- ° Onsite first aid capability is provided.
- ° Arrangements have been made to transport victims of radiological accidents to medical support facilities.

M. RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

Planning Standard

General plans for recovery and reentry are developed.

Emergency Plan:

- ° General plans and procedures for reentry and recovery are developed and the means are described by which decisions are reached to relax protective measures.
- ° The structure, functions and membership of the facility recovery organization are described.
- ° Means are specified for informing members of the response organizations that a recovery operation is to be initiated.
- ° A method for periodically estimating total population exposure is established.

N. EXERCISES AND DRILLS

Planning Standard

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.

Emergency Plan:

- ° An annual emergency preparedness exercise will be conducted which involves the mobilization of offsite emergency response personnel.
- ° A critique of the annual exercise by Federal, State and local observers is provided.
- ° The scenarios of the exercises are varied from year to year such that all major elements of the Emergency Response Plan and its procedures are evaluated every five years.
- ° Required communication drills are provided.
- ° Fire drills will be conducted in accordance with the Station Technical Specifications.

- At least one medical emergency drill will be conducted each year.
- Required radiological monitoring and health physics drills are provided.
- Exercise scenarios include such items as (1) basic objectives of the exercise or drill including evaluation criteria; (2) date, time period and participating agencies; (3) events to be simulated; (4) approximate time schedule of real and simulated events; (5) a narrative summary description of the exercise or drill; and (6) arrangements made for qualified observers.
- A critique by government observers, resulting in a formal evaluation, is provided.
- Comments are discussed in a post-drill critique, with deficiencies being identified and proper corrective action determined by responsible plant staff.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Include a commitment to conduct exercises under various weather conditions and at differing times of day, in accordance with criteria N.1.b of NUREG-0654. Also, some exercises should be unannounced.

2. Communications with the NRC shall be tested monthly in accordance with paragraph E.9.d of Appendix E to 10 CFR Part 50.
3. Communications drills should include the aspect of understanding the message content.
4. Discuss the mix of structured and less structured aspects of the program which will allow free play for decision making during drills and exercises.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

Planning Standard

Radiological emergency response training is provided to those who may be called on to assist in an emergency.

Emergency Plan:

- ° Site specific training is offered to offsite emergency organizations particularly hospital, ambulance/rescue and fire departments.
- ° Onsite emergency groups receive formal as well as practical training during drills. Erroneous performance during drills is corrected on-the-spot through demonstration by instructors.
- ° A specialized training program including initial and periodic retraining sessions has been established for the following organizational categories:
 - a) directors/coordinators of response groups;
 - b) personnel responsible for accident assessment;
 - c) radiation monitoring teams;
 - d) fire fighting;
 - e) repair and damage control;
 - f) first aid and rescue;
 - g) medical support personnel;
 - h) licensee headquarters support personnel;
 - i) personnel responsible for communications.
- ° The licensee has provided for initial and annual retraining of personnel with emergency response duties.

P. RESPONSIBILITY FOR THE PLANNING EFFORT:
DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

Planning Standard

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

Emergency Plan:

- Personnel responsible for the licensee's emergency planning effort receive appropriate training to maintain and/or increase their competency.
- The individual with overall authority and responsibility for radiological emergency response planning is the Superintendent, Chemistry and Radiation Management. Reporting to him is the Emergency Planning Coordinator.
- The Emergency Planning Coordinator is responsible for the development and updating of emergency plans and coordination of these plans with other response organizations.
- Periodic revision of the plan, as needed, including changes identified by drills and exercises, is provided.
- The distribution of plans and approved changes to all organizations and appropriate individuals is provided.

- ° A detailed listing of supporting plans is given.
- ° A listing of the procedures required to implement the plan is given.
- ° A table of contents and cross references to NUREC-0654 are included.
- ° An independent review and audit of the emergency preparedness program will be conducted annually by members of the corporate staff and/or consultants.
- ° Contacts with each outside emergency response agency are made quarterly to verify telephone numbers and points of contact.

DEFICIENCIES:

The plan requires revision and/or additional information as follows:

1. Include as part of Appendix C, the appropriate section of the plan to be implemented by each procedure.

CONCLUSION

Based on our review, we conclude that the Nine Mile Point Emergency Plan, upon satisfactory correction of the previously identified deficiencies, will meet the planning standards set forth in NUREG-0654, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.

The NRC evaluation on the overall state of emergency preparedness for the Nine Mile Point Site will be made following review of the findings and determinations made by FEMA on the State and local emergency response plans, and the review of the joint exercise held to demonstrate the capability to implement the onsite and offsite plans.