



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

October 18, 1990

Mr. Bruce Arons
Plymouth Board of Selectmen
11 Lincoln Street
Plymouth, Massachusetts 02360

Dear Mr. Arons:

I am responding to the August 10, 1990 letter from former Chairman Alba C. Thompson concerning our Inspector General's recent report on the investigation of the Nuclear Regulatory Commission (NRC) staff's testimony on the status of off-site emergency preparedness during the October 14 and December 9, 1988 Commission meetings. These meetings were held to consider information pertinent to the restart of the Pilgrim Nuclear Power Station. 50-243

The Commission is concerned that the report raises questions about the thoroughness of the staff's assessment of off-site emergency preparedness at Pilgrim and the accuracy of certain information provided by the staff during meetings with the Commission. The Inspector General has confirmed that there is not evidence sufficient to substantiate that any member of the NRC staff intentionally provided inaccurate information to the Commission. Accordingly, we have directed that the staff conduct a "lessons-learned" review to address whether any staff omission or error occurred and the need for any additional staff guidance or procedures were the circumstances to arise for the staff to again conduct a review of this unique type. That review has recently been completed and is currently under review by the Commission.

In addition to the "lessons-learned" review, a special task force has been established to review the comments and documents presented to the staff at the September 6, 1990 public meeting in Plymouth. The special task force will also review the soon-to-be issued FEMA status report; conduct field verification of issues in dispute; issue an updated emergency preparedness status report; and provide a recommendation, based on the analysis of any new information, on whether the Commission should reconsider its reasonable assurance finding.

Regarding the statement in Ms. Thompson's August 10, 1990 letter that she never received a reply to her letter to the NRC dated October 31, 1988, a copy of the NRC reply dated December 5, 1988 is enclosed with this letter.

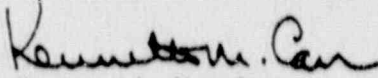
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We believe the actions we are taking are appropriate to address the issues raised in the Inspector General's report and the status of emergency preparedness at the Pilgrim Nuclear Power Station.

Sincerely,


Kenneth M. Carr

Enclosure:
December 5, 1988 Ltr fm
Chairman Zech to Ms. Thompson



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

December 5, 1988

Ms. Alba C. Thompson, Chairman
Plymouth Board of Selectmen
Town of Plymouth
11 Lincoln Street
Plymouth, Massachusetts 02360

Dear Ms. Thompson:

I am responding to your letters of October 19 and 31, 1988, concerning the status of emergency planning in the Town of Plymouth.

The Commission is interested in hearing the views of local officials and citizens on issues associated with the restart of the Pilgrim facility, including the status of emergency planning in the towns surrounding the plant. Prior to the Commission's October 14 meeting, the Nuclear Regulatory Commission (NRC) staff had conducted a series of meetings in the vicinity of the Pilgrim facility to hear the views of the public on the possible restart of Pilgrim. During the October 14 meeting, the Commission heard the views of elected representatives from Massachusetts, including Lt. Governor Murphy, Senator Kennedy, and Representative Studts. As a result of the Commission's own concern about the status of emergency planning, we postponed any decision on the restart of the plant to further evaluate this issue. In addition, the NRC's Executive Director for Operations has personally spoken with Mr. Douglas Hadfield, Plymouth Civil Defense Director, and staff representatives recently met with Civil Defense Directors and other local officials in the seven emergency planning zone and reception center communities around Pilgrim, including the Town of Plymouth. These meetings were held to enable the NRC to obtain first-hand information on the status of the local emergency plans and procedures and to hear the concerns of local officials. I am enclosing copies of documents that summarize these recent interactions.

The Commission has decided to hold a public meeting in our Rockville, Maryland, headquarters building to hear from local officials regarding the status of emergency plans and the readiness of local communities to protect the public in the event of an emergency. This meeting has been scheduled for

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2:00 p.m. on December 9, 1988. The Secretary of the Commission has informed me that you plan to participate in this meeting. We welcome your participation and will appreciate hearing your views on this matter. In order to fully consider all of the information that will be presented, the Commission does not plan to reach a decision on the restart of the Pilgrim plant at this meeting.

I know that you, and your colleagues in the surrounding communities, are taking your responsibilities to protect the health and safety of your citizens very seriously, and I commend you for your efforts to put in place effective emergency plans and procedures. I can assure you that the Commission takes its responsibilities equally seriously, and that we will not authorize the Pilgrim plant to restart unless we are convinced that it can be operated safely and that the public health and safety will be protected.

Sincerely,

Lando W. Zech Jr.
Lando W. Zech, Jr.

Enclosures:
As stated

Summary of Emergency Preparedness
Review Process at Pilgrim

FEMA is responsible for the review and approval of offsite emergency plans, including determining whether State and local governments can effectively implement these plans in accordance with Part 350 of Chapter 44 of the Code of Federal Regulations (44 CFR 350). This finding is then forwarded to the NRC for our use under the regulations (10 CFR 50.47). In order to assist FEMA in the technical aspects of emergency planning, a Regional Assistance Committee (RAC), chaired by FEMA, is established. The principal organizations that comprise the RAC are FEMA, NRC, the Department of Health and Human Services, the Department of Energy, the Department of Transportation, the Environmental Protection Agency, the Department of Agriculture, and the Department of Commerce.

The normal review process for revisions to offsite emergency plans and implementing procedures occurs when the local governments forward emergency plan revisions to the Commonwealth and the Commonwealth, in turn, forwards them to FEMA. FEMA, with assistance from the RAC, reviews the revised plans, makes a determination of adequacy, and transmits this finding to the NRC, as well as to the Commonwealth. This review is normally done on an annual basis or, as needed, when a complete plan revision is received. NRC involvement in this process is normally through our RAC participation with FEMA and through our State Liaison program with the Commonwealth. The review process does not normally involve interaction directly with local government officials, nor does it necessarily involve detailed review of implementing procedures. Occasionally, implementing procedures are reviewed to ensure complete planning. For example, lists of schools in the emergency planning zone (EPZ) could be included in the plan or in the implementing procedures. If the plans have sufficient detail, a review of the procedures is not required. Portions of plans and procedures may be verified by limited demonstrations, drills or training evolutions, at the discretion of state or local entities responsible for those plans and procedures. Exercises are periodically conducted to confirm training and implementation of procedures.

For the Pilgrim facility the NRC essentially used the process described above. Draft plans were forwarded to the Commonwealth from the local towns, reviewed by the Commonwealth, and forwarded to FEMA for technical review. The NRC, as a member of RAC, was a principal reviewer for the submitted draft plans and provided detailed comments to FEMA on these plans.

After FEMA informs NRC of deficiencies in offsite emergency plans, as it did for Pilgrim, it is the NRC's responsibility to decide whether or not to take enforcement action. The decision is based upon the deficiencies identified and subsequent remedial actions. Because Pilgrim was shut down and remedial actions were being taken, the staff decided that enforcement actions were not necessary but that specific remedial action satisfactory to the staff was necessary before restart. In order to reach a position regarding its recommendation for restart, the staff sought out additional information on the status of planning from both the Commonwealth and Boston Edison. It should be noted that Mr. William Russell, Regional Administrator, in a telephone conversation with Mr. Peter Agnes, Assistant Secretary of Public Safety, in August 1988 offered to have NRC technical staff meet with the local Civil Defense Directors in order to determine the current status of emergency planning and areas of local concern. This offer was declined by the Commonwealth. Mr. Agnes subsequently suggested that NRC staff review planning documents at the Massachusetts Civil Defense Authority (MCDA) offices in Framingham, Massachusetts. This review occurred on August 22, 1988.

The NRC is continuing to assess the progress of emergency preparedness at Pilgrim and to receive comments from Commonwealth and local officials. FEMA review of documents submitted to them is also continuing. The staff received comments from Mr. Agnes at an October 5, 1988 meeting between Dr. Murley, Boston Edison Company, and the Commonwealth. Additional material was contained in a report prepared by Secretary Barry and received by the staff on October 11, 1988. The Commissioners were briefed on the status of emergency preparedness at Pilgrim on October 14, 1988 and staff meetings were held with local officials of communities surrounding Pilgrim in late October.



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

ENCLOSURE 2

NOV 02 1988

MEMORANDUM FOR: Chairman Zech

FROM: Victor Stello, Jr.
Executive Director for Operations

SUBJECT: PHONE CALL WITH MR. J. DOUGLAS HADFIELD, CIVIL DEFENSE
DIRECTOR FOR THE TOWN OF PLYMOUTH, MASSACHUSETTS

At your request, I called Mr. Hadfield on Friday morning (October 21) to discuss his letter to you dated October 17, 1988. With me were Mr. James Taylor, Mr. William T. Russell, Mr. James Sniezek, and Mr. William G. Kennedy to prepare notes of the discussion. After introductions, Mr. Hadfield and I discussed his concerns.

Mr. Hadfield explained that the list of special needs people was not up to date, although a three-year old list had been updated with a few people that had responded to a recent newspaper article. Although Mr. Hadfield stated that he did not personally know of any others who should be added, he felt that others probably needed to be added who were not on the list due to confidentiality concerns. When I asked why the list had not been updated, he responded that a survey by the state department of handicap affairs was necessary but that funding had not been provided by the state or utility. Mr. Russell added that he understood that the utility was willing to fund the survey but was awaiting the specifics. I summarized that the current list was the best information available today and Mr. Hadfield agreed.

The next subject was the status of implementing procedures. Mr. Hadfield explained that none of Plymouth's implementing procedures have been submitted to the Massachusetts Civil Defense Agency (MCDA). Three of the most critical implementing procedures have not been approved by the Selectmen. (In fact, close to 60 have yet to go through the Board of Selectmen.) Two of the three exist in draft form and have been approved by their respective department heads (for Fire and Police departments). The third procedure was for the schools. The school superintendent decided to involve the two school committees in the approval of their procedure and a meeting was planned for Monday evening (October 24) to get public input. When the procedure for the schools is acceptable to the school committees, it will have to be approved by the Selectmen. However, in Mr. Hadfield's professional opinion, all three implementing procedures were acceptable.

Mr. Hadfield also explained a concern for a point discussed at the October 14th Commission meeting. He was concerned that the discussion about the beach population on page 97 and 98 of the meeting transcript may leave the impression that no one stayed there overnight when, in fact, there are residents who live in the beach area, some year round, and it is only the transients who are not permitted to stay overnight. Mr. Russell assured him that we understood that and that the discussion in the transcript related to the transient beach population only and not to permanent residents.

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The next concern raised by Mr. Hadfield was that he was not sure that the individual procedures would work together. I agreed that this aspect could only be evaluated by an integrated test; however, I explained that it was our experience that when a good job had been done on the individual procedures, like those at Pilgrim, the exercises usually go well and do not identify significant problems. Mr. Hadfield acknowledged our experience.

We then went back to the status of the implementing procedures and the staff's presentation to the Commission. Mr. Hadfield was concerned that no one on the NRC's staff could have seen his procedures because they have not been forwarded yet. Mr. Russell acknowledged that there were two places in the meeting transcript where the staff had not stated the complete status in response to Commissioner questions. The staff had accurately characterized the Plymouth status during the prepared presentation. He added that the staff was going through the transcript and would clarify the statements where necessary. Mr. Hadfield did provide information that was new to Mr. Russell in that the Jordan Hospital administrator was not yet satisfied with their procedure but that a draft existed. Mr. Hadfield and I agreed that the procedures were not "final" until after an exercise and will always be living documents subject to revisions.

The next issue raised by Mr. Hadfield was a question of manpower. He stated that no polls had been taken in Plymouth although the experience is that in emergencies, usually more people volunteer than are necessary. I acknowledged this.

We discussed the limitation on speakers at the NRR public meeting on October 5 and the Commission meeting. I explained the Commission's policy on hearing speakers at their meeting and our expectation that the Commonwealth would integrate and present all local public concerns. I also stated that given the apparent loss of public confidence after the NRR meeting, we probably should have allowed Mr. Hadfield and the other local official to present their statements. He stated that he recognized the need to impose some limits on public meetings.

The last issue discussed was a question Mr. Hadfield had concerning any NRC requirements for calibration of radiological survey instruments. I explained that we had requirements for those inside the plant but looked to civil defense authorities to apply common sense to keep their instruments in working condition. He stated that the questions stemmed from the fact that FEMA will only reimburse the state based on a four year cycle.

Mr. Hadfield stated that the above covered all of his concerns but still requested a meeting. In response to Mr. Hadfield's request, I agreed to direct Mr. Russell to have one of his professionals meet with Mr. Hadfield. A Tuesday afternoon meeting (October 25) was tentatively agreed to.

Finally, I asked Mr. Hadfield if he agreed with me that the overall planning and state of preparedness was substantially and significantly improved in all areas over what had existed in 1985. He agreed saying that they were "light years ahead". We also agreed that the real issues were complete planning versus ad hoc response.

Mr. Hadfield has reviewed this description of our discussion and agrees with its contents. We have accommodated his comments which are provided in the attached letter dated October 26, 1988.

original signed by
Victor Stello

Victor Stello, Jr.
Executive Director
for Operations

cc: Commissioner Roberts
Commissioner Carr
Commissioner Rogers
Commissioner Curtiss
SECY
OGC
J. D. Hadfield

Enclosure: As stated



OFFICE OF

EMERGENCY PREPAREDNESS

AND

CIVIL DEFENSE



J. DOUGLAS MADFIELD
DIRECTOR

MEMORIAL HALL
88 COURT STREET
PLYMOUTH, MA 02868
(617) 740-4100

October 26, 1988

Mr. Victor Stello, Jr.
Executive Director for Operations
United States Nuclear Regulatory Commission
Washington, D. C.
20555

Dear Mr. Stello,

I have reviewed the memorandum covering our telephone conversation of October 17, 1988. After reviewing the document, I have the following comments.

Page 2 "Three implementing procedures have not been approved by the Selectmen."

This statement gives the impression that there are only three procedures remaining that have not yet been approved by the Selectmen. In fact, close to 60 have yet to go through the Board of Selectmen. The statement should be changed to include this fact. Included in this statement should be the fact that 3 of the most critical implementing procedures have yet to be seen by the Selectmen. (These are the ones mentioned further on in the paragraph: Fire, Police, and Schools.)

Other than the above mentioned changes, I agree with the memorandum.

Sincerely,

J. Douglas Madfield
Director

cc:BOC

JDM/dlm

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LP.



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 REGION I
 675 ALLENDALE ROAD
 KING OF PRUSSIA, PENNSYLVANIA 19380

November 1, 1988

MEMORANDUM FOR: William Russell, Regional Administrator

THRU: R. Bellamy, Chief, Facilities Radiation Safety and Safeguards Branch, DRSS

FROM: W. Lazarus, Emergency Preparedness Section Chief, FRS&SB
 R. Hogan, Emergency Preparedness Specialist, NRR

SUBJECT: MEETING WITH CIVIL DEFENSE OFFICIALS IN THE TOWN OF PLYMOUTH TO DISCUSS THE STATUS OF EMERGENCY PREPAREDNESS ON OCTOBER 25, 1988

BACKGROUND

This meeting was conducted in the Plymouth EOC on October 25, 1988. The purpose of the meeting was to obtain the latest factual information regarding the status of emergency plans, implementing procedures, and facilities, directly from the Director of Emergency Preparedness for the Town of Plymouth. The Emergency Preparedness Director was also provided an opportunity to bring any previously unidentified concerns regarding the status of emergency preparedness to the attention of the NRC.

ATTENDEES

J. Douglas Hadfield, Director, Office of Emergency Preparedness
 Alba C. Thompson, Chairman, Board of Selectmen
 William J. Lazarus, Emergency Preparedness Section Chief, NRC Region I
 Rosemary T. Hogan, Emergency Preparedness Specialist, Office of NRR

DISCUSSION

Mr. Hadfield, and Ms. Thompson presented the following status summaries and concerns regarding the state of emergency preparedness in the Town of Plymouth.

Implementing Procedures (IPs)

This status is based on Mr. Hadfield's comments, review of the IP status list that was provided at the meeting (attached), and a telephone conversation with Mr. Hadfield to clarify discrepancies on October 28, 1988.

Of the 57 IPs identified on the attached list, all exist at least in draft form. The review process involves a review by the cognizant department head, then review by the RERP Committee, and finally review and approval "in concept" by the Board of Selectmen. As of the date of this meeting, 34 IPs have been "approved in concept". Of the remaining procedures, 17 have been through the RERP Committee and are awaiting review by the Board of Selectmen. That leaves 4 procedures which have not been reviewed by the RERP Committee. One of the 4 (Special Needs

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Officer) has been approved at the department head level and is awaiting review by the RERP Committee. In addition to the IPs on the attached list, there are 34 shelter procedures. The model for these 34 procedures (Shelter Manager Procedure) has been "approved in concept" by the Board of Selectmen. Review and approval of all of the IPs at the local level is expected to be complete in 10 to 12 weeks. The IPs which have not yet been approved at the department head level include Saquish, Monitoring and Decontamination, and Jordan Hospital.

The following items were identified as specific concerns which remain to be resolved before some of these IPs can be approved:

Police: Division of responsibilities between the Plymouth Police and state police needs to be determined, as the procedures identify 40 access points and 40 traffic control points and there are only 78 police officers available from Plymouth. The need for protective clothing for police manning positions in the EPZ during radiological emergencies has not yet been determined.

Schools: The Joint School Committee met on October 24, 1988 to review the school procedures. There are 8 elementary, 1 intermediate, and 2 high schools involved. The outcome of that review was not known at the time of this meeting. In a telephone conversation on 10/28/88, Mr. Hadfield related that the committee did not approve the school procedure, but that they had authorized training for the elementary school teachers. Concerns have been raised regarding the appropriate way to notify parents of evacuation of the children; legal questions regarding transportation of school children out of the town; and the question of whether teachers would participate in the evacuation of the school children. Still being considered is a change to the school procedures which would have children sent home at the ALERT level rather than holding them at the school and then evacuating them at the SITE AREA EMERGENCY as the state would like. This is apparently being considered because children would be moved before the parents knew there was a problem, since there is no EBS broadcast at the ALERT level. A joint committee is attempting to resolve differences between Carver and Plymouth in the procedure for the Carver (Regional) High School (which is shared by Plymouth and Carver).

Hospital: Jordan Hospital has serious problems with their implementing procedure as it deals with the evacuation of patients. Details of the concern were not known at this time. A second concern raised by Mr. Hadfield was that the Jordan Hospital is also the hospital which would be used for treatment of any injured/contaminated workers from the site in case of an accident, and he wasn't clear on how they would be handled if the hospital was evacuated. The Jordan Hospital procedure was considered by

Mr. Hadfield to be the biggest obstacle to the completion of the IPs.

Mr. Hadfield acknowledged that he had copies of the latest drafts of all implementing procedures in the EOC. They were presently contained in 7 2 1/2 inch binders whereas the total previous town plan was a little more than an inch thick.

Personnel Resources

Police need to work out division of responsibilities with the state police because there are too few Plymouth police to handle all the access control and traffic control points.

Special Needs Population

The town is still working to get people with special needs to "self-identify". An advertisement is being placed in the local newspaper once per month for the next six months requesting that people with special needs contact the Emergency Preparedness Office to have their names placed on a confidential list which could be used to assist them in the event of an accident. This process is hoped to update completely the list maintained by the town.

Barry Report

Mr. Hadfield indicated that although he had a problem with the state speaking generically for the towns, the third Barry Report was generally complete regarding the status and problems faced by Plymouth. He was not sure if the concerns with the Jordan Hospital procedure were reflected in that report.

Representation at the Commission Briefing on October 14, 1988

Mr. Hadfield and Mrs. Thompson both indicated that the Lt. Governor, Senator Kennedy, and Congressman Studds had fairly represented their concerns at the Commission briefing, although their comments lacked the specifics which they were bringing out in our meeting.

Saquish - Gurnet Point Area

At the present time there is not an adequate procedure for the protection of the 200 - 400 summer residents plus another 200 - 300 campers who would be in the Saquish - Gurnet Point area. The homeowners are working on development of a plan. The concern is that part of the only road off the Saquish Beach area is under water for some period of time during the full moon each month, and that a boat is the only way out during that time.

Plymouth

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Implementation of the Plan

When asked whether he thought he could implement the plan and procedures, Mr. Hadfield indicated that he honestly couldn't answer the question due to the incomplete state of development, review, and training. Individual department heads would be in a better position to make such an assessment. Ms. Thompson indicated that restart should not be permitted until effective plans are in place, but that she was not saying that a full-scale exercise was necessarily required to make that determination. Mr. Hadfield did indicate that there was no question that they were ahead of where they were in the planning process a few years ago, and that they had made great improvements.

Mr. Hadfield was provided a copy of this memo and indicated that it accurately reflected the status he presented during our discussions.


William J. Lazarus
EP Section Chief, Region I


Rosemary T. Hogan
EP Specialist, NRR

cc: J. Dolan, FEMA Region I

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