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August 2, 1982

Louis J. Carter, Esq., Chairman  
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 Atomic Safety and Licensing Board  
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Dr. Oscar H. Paris DMB-PDR/LPDR  
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 Atomic Safety and Licensing Board  
 U.S. Nuclear Regulatory Commission  
 Washington, DC 20555

Mr. Frederick J. Shon  
 Administrative Judge  
 Atomic Safety and Licensing Board  
 U.S. Nuclear Regulatory Commission  
 Washington, DC 20555

In the Matter of  
 Consolidated Edison Company  
 of New York (Indian Point, Unit 2)  
 Power Authority of the State of  
 of New York (Indian Point, Unit 3)  
Docket Nos. 50-247-SP and 50-286-SP

Dear Administrative Judges:

In accordance with the Board's instructions of July 7, 1982 (Tr. 2589), the Staff hereby submits a copy (enclosed) of the Federal Emergency Management Agency (FEMA) interim findings report on the adequacy of radiological emergency response preparedness at the Indian Point facilities for the information of the Licensing Board and parties.

Sincerely,

Donald F. Hassell  
 Counsel for NRC Staff

Enclosure: As stated

cc w/encl: Service List

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# Federal Emergency Management Agency

Washington, D.C. 20472

AUG 2 1982

Mr. William Dircks  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Dircks:

Enclosed is the Federal Emergency Management Agency (FEMA) interim findings report on the adequacy of radiological emergency response preparedness of State and local governments at the Indian Point Power Station. It is the determination of FEMA that at this time plans and preparedness are inadequate as noted by the enclosed July 30, 1982, FEMA documentation.

FEMA will continue to assist the State and counties in their planning process and implementation of remedial actions in accordance with schedules provided by the State of New York.

I will keep you informed about the progress made by the State and counties in implementing the remedial action.

Sincerely,

A handwritten signature in cursive script that reads "Lee M. Thomas".

Lee M. Thomas  
Associate Director  
State and Local Programs and  
Support

Enclosures  
As stated



# Federal Emergency Management Agency

Region II      26 Federal Plaza      New York, New York 10278

July 29, 1982

MEMORANDUM FOR: Lee M. Thomas, Associate Director  
State and Local Programs and Support

FROM: Frank P. Petrone  
Regional Director

SUBJECT: Interim Findings Report - Indian Point Nuclear Power  
Generating Station

In response to the Nuclear Regulatory Commission request of June 16, 1982, attached is the Interim Findings Report on the adequacy of offsite preparedness around the Indian Point site.

The New York State emergency response plan was reviewed by the RAC representatives, and comments were provided to the Chairman of the New York Disaster Preparedness Commission on September 29, 1981. RAC comments on the site-specific portions of the State plan for Indian Point and a review of county plans were provided on December 31, 1981. This review identified plan deficiencies and requested a schedule for remedial actions. A response to the site specific RAC review was provided by the Director, Radiological Emergency Preparedness Group of the Department of Health on June 25, 1982. This response specified a date of August 1, 1982 for completion of necessary revisions to State plans and October 1, 1982 for revision of county plans.

The radiological emergency exercise conducted on March 3, 1982 was the first exercise that involved participation by State, local and plant personnel evaluated under the criteria of NUREG-0654. The exercise was evaluated by a 50-member federal observer team. A post-exercise assessment was provided to the State of New York on June 1, 1982. A response was provided by the Director, Radiological Emergency Preparedness Group of the Department of Health on July 9, 1982.

Two public meetings as provided by 44 CFR 350.10 were held on July 26 and 27, 1982.

Based on a review of the above information, it is the Regional Director's evaluation that the present State Radiological Emergency Preparedness Plan (RERP) with its Annexes contain significant deficiencies as they relate to five of the planning standards of NUREG-0654/FEMA-REP-1, Rev. 1.

Specifics as to capability to carry out the offsite protective actions are contained in the attached report.

Attachment

INTERIM FINDINGS ON THE ADEQUACY  
OF  
RADIOLOGICAL EMERGENCY RESPONSE PREPARATION  
OF  
STATE AND LOCAL GOVERNMENTS  
AT THE  
INDIAN POINT NUCLEAR POWER STATION

July 30, 1982

Prepared by the  
FEDERAL EMERGENCY MANAGEMENT AGENCY  
REGION II

Frank P. Petrone  
Regional Director

26 Federal Plaza  
New York, NY 10278

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## 1 EXECUTIVE SUMMARY

This report presents interim findings by Federal Emergency Management Agency (FEMA) on the adequacy of State and local radiological emergency plans and preparedness to deal with the effects of radiological emergencies occurring at the Indian Point Nuclear Power Station. Determinations of adequacy are based on review of the emergency response plans of the State of New York and the counties of Orange, Putnam, Rockland and Westchester, and on the observed performance of these political jurisdictions during an exercise of the plans conducted on March 3, 1982. FEMA, with the assistance of the Regional Assistance Committee (RAC), provided comments on the plans and exercise to the State. Recently, the State provided the responses to these comments along with a requested schedule of corrective actions. FEMA has not had the opportunity to perform field verification of State and county statements regarding completed corrective actions. Moreover, the State bases a majority of its projected corrective actions on the assumption that sufficient funds will be available to cure the cited deficiencies.

The State and the three (3) counties of Orange, Putnam and Westchester have made commitments to undertake remedial actions to resolve most of the deficiencies noted. However, upon review of the responses from the State of New York relating to the State and county components of the Radiological Emergency Preparedness Plan (REPP) and after review of the legislative action taken by the Rockland County Legislature (Resolution 310), FEMA has determined that significant deficiencies exist with respect to five planning standards of NUREG-0654/FEMA-REP-1. These planning standards along with highlights of the specific deficiencies for each standard are listed below.

o Notification Methods and Procedures (Planning Standard E)

Observed equipment failures of the alert and notification system (sirens) and lack of criteria at the State and county level to determine what emergency public information will be disseminated via EBS and through news releases.

o Public Education and Information (Planning Standard G)

- Lack of a complete public education campaign regarding Emergency Response Planning Areas (ERPAs) and reception and congregate care centers.

- Inadequate distribution of the Public Education brochure. EPZ residents must be aware of the zone number in which they reside because emergency public information is provided by ERPA zone number.
- Need for publication of the Public Information brochure in language(s) other than English.
- Inadequate arrangements for dealing with rumors.

o Protective Response (Planning Standard J)

- Inadequate means for notification of transients
- No maps showing population distribution around the nuclear facility
- No provisions for use of radioprotective drugs for emergency workers
- No identification of and means for dealing with impediments to use of evacuation routes
- No details of protective measures to be used for ingestion pathway
- Inadequate means for monitoring of evacuees at relocation centers

o Radiological Exposure Control (Planning Standard K)

- Absence of permanent dose record devices and 24-hour capability to determine doses received by emergency personnel
- Insufficient personnel and equipment resources for decontamination of personnel

o Responsibility for the Planning Effort (Planning Standard P)

The RAC comments to the State identified a number of deficiencies in regard to Planning Standard P. The actions taken by the Rockland County Legislature coupled with the previously identified deficiencies has led FEMA to determine that significant deficiencies now exist with respect to this planning standard, as highlighted below:

- Each organization providing for training of individuals responsible for the planning effort
- Updating of plan and agreements, as needed
- Review and certify plan to be current on annual basis

In general, significant deficiencies remain uncorrected for one or more of the following reasons:

- o Lack of detail or completeness on the action to be taken
- o Inadequacy of planned remedial action

- o Delays in implementing remedial actions due to lack of funding
- o Remedial actions scheduled, but not yet in place.
- o Withdrawal of a county from participation in the State/County planning process.

Except for the Rockland County legislative action, resolution of significant deficiencies are considered correctable in the future by the commitment of appropriate resources, implementation of proposed training, updating of plans including letters of agreement and submission of supplemental information to FEMA. Once corrective actions are taken, field verification will be required.

At the time of FEMA's testimony before the Indian Point special ASLB, significant deficiencies existed with respect to Planning Standard F, Emergency Communications. Upon review of information received from the State after June 25, 1982, FEMA has revised its assessment with respect to Planning Standard F from significant to minor deficiency.

Highlights of the concerns and recommendations from the residents at the two public meetings held on July 26th and 27th are also presented in this report.

The schedule of remedial actions enumerated in the state correspondence to FEMA, if implemented, if projected funding is provided, and if provisions are made to assure adequate planning for Rockland County, then the radiological preparedness at the state and county level will improve. However, it is the determination of FEMA that at this time plans and preparedness are inadequate as noted.

FEMA will continue to review remedial actions taken by the state and counties to solve planning deficiencies, and will supplement this report as necessary to reflect changes in the state of preparedness.



## 2 INTRODUCTION

This report presents the interim findings of Region II, Federal Emergency Management Agency (FEMA) on the adequacy of emergency radiological response preparedness of the State of New York and the counties in the vicinity of the Indian Point Nuclear Power Station, located near Buchanan, New York. It summarizes the review by FEMA of the New York State Radiological Emergency Preparedness Plan (REPP) and the exercise of the plan that was conducted on March 3, 1982. A formal report will be completed by FEMA in accordance with federal regulations 44 CFR Part 350 after conclusion of all evaluations.

### 2.1 DESCRIPTION OF THE INDIAN POINT POWER STATION AND VICINITY

The Indian Point Nuclear Power Station (Indian Point) is located on the east bank of the Hudson River about 24 miles north of the New York City boundary line in Westchester County. The site contains two operating pressurized water reactors. Unit 1 is permanently shut down. Unit 2 is a 873 MWe unit owned and operated by Consolidated Edison. Unit 3 (965 MWe) is owned and operated by the Power Authority of the State of New York. The ten-mile emergency planning zone extends into four counties: Westchester, Rockland, Orange, and Putnam. The 50-mile emergency planning zone comprises portions of four states: New York, New Jersey, Connecticut, and Pennsylvania. Approximately 17,000,000 people live within a 50-mile radius of the plant.

### 2.2 EMERGENCY PLANNING AUTHORITY AND ORGANIZATION

Emergency planning and response is directed by the State of New York Department of Health (DOH) and the New York State Office of Disaster Preparedness (ODP). The DOH is responsible for recommending the implementation of protective actions, radiological accident assessment, and radiation exposure control. The ODP is responsible for coordinating state agency actions and intercounty response activities.

The authority to manage the radiological emergency in Orange, Putnam, and Westchester Counties is vested in the County Executive, and in Rockland County in the Chairman of the Legislature. Coordination is designated to the following county representatives: Orange County, the Assistant Director Office of Disasters; Putnam County, the Civil Defense Director; Rockland

County, the Deputy Director of the Office of Emergency Services; and in Westchester County, the Director of Disaster and Emergency Services.

### 2.3 STATUS OF PLANS AND EXERCISES

Evaluation of emergency planning is made by the FEMA Region II Director, Frank P. Petrone, who is advised by the Chairman of the Regional Assistance Committee (RAC), Roger B. Kowieski. The RAC is composed of representatives from the following agencies:

- o the Nuclear Regulatory Commission (NRC)
- o the Environmental Protection Agency (EPA)
- o the Department of Energy (DOE)
- o the Department of Commerce/National Weather Service (DOC/NWS)
- o the Department of Transportation (DOT)
- o the Food and Drug Administration (FDA)
- o the Department of Health and Human Services (HHS)
- o the U.S. Department of Agriculture (USDA)

The New York State Radiological Emergency Preparedness Plan (REPP) was reviewed by the RAC representatives, and comments were provided to the Chairman of the New York Disaster Preparedness Commission on September 29, 1981. RAC comments on the site-specific portions of the state plan for Indian Point and a review of county plans were provided on December 31, 1981. Both reviews identified plan deficiencies and requested a schedule for remedial actions. A response to the RAC review comments on the State site-specific plan and county plans was provided by the Director, Radiological Emergency Preparedness Group, New York State Department of Health to FEMA, on June 25, 1982. The State did not provide a schedule of corrective action in response to RAC comments on the State REPP (FEMA letter dated September 29, 1981). Instead, the State submitted a revised REPP to FEMA for review. The dates of August 1, 1982 and October 1, 1982 were designated by the state for completion of necessary revisions to the state REPP Site Specific Operations Annex for Indian Point and county plans, respectively.

The radiological emergency exercise conducted on March 3, 1982 was the first exercise for the Indian Point site that involved participation by state, county and plant personnel evaluated under the criteria of NUREG-0654. The exercise was evaluated by a 50-member federal observer team. A post-exercise assessment was provided to the State of New York on June 1, 1982.

#### 2.4 MATERIALS AVAILABLE FOR EXAMINATION

Previous reports, state and county emergency plans, and other source documents presenting information pertinent to this finding include the following:

- o New York State Radiological Emergency Preparedness Plan, July 1981
- o Orange County Radiological Emergency Response Plan, Revision 1, August 1981
- o Putnam County Radiological Emergency Response Plan, Revision 1, August 1981
- o Rockland County Radiological Emergency Response Plan, Revision 1, August 1981
- o Westchester County Radiological Emergency Response Plan, Revision 1, August 1981
- o FEMA Regional Assistance Committee comments on the State REPP and the Oswego County Radiological Emergency Preparedness Plan for Nine-Mile Point and the Post-Exercise Assessment for the Nine-Mile Point Exercise, letter from V. Forde, Acting Regional Director, FEMA, to W. C. Hennessy, Chairman, Disaster Preparedness Commission, State of New York September 29, 1981.
- o FEMA Regional Assistance Committee comments on the state site-specific plan and county plans, letter from V. Forde, Acting Regional Director, FEMA to W. C. Hennessy, Chairman, Disaster Preparedness Commission, State of New York December 31, 1981
- o State of New York responses to Regional Assistance Committee comments on REPP site-specific and county portions of the state plan, letter from D. B. Davidoff, Director, Radiological Emergency Preparedness Group to R. Kowieski, Chairman, Regional Assistance Committee June 25, 1981
- o Post-Exercise Assessment, Indian Point Nuclear Generating Station, FEMA, May 27, 1982

### 3 EVALUATION OF EMERGENCY PREPAREDNESS

In accordance with a memorandum of understanding with the Nuclear Regulatory Commission cited in 44 CFR Part 350, FEMA has agreed to furnish assessments, findings, and determinations as to whether state and local emergency plans and preparedness are adequate and capable of implementation.

Guidance for the development and the review of emergency plans is contained in the document "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654/FEMA REP-1, Revision 1, November 1980. The following sections of this interim report present, for each planning standard of NUREG-0654, FEMA REP-1, Rev. 1, a discussion of:

1. Initial RAC evaluation of state and county emergency plans and exercise.
2. State and county responses to RAC evaluations; and
3. A determination of the current adequacy of each planning standard based on state and county responses. This determination has been made by FEMA with consideration of comments from six RAC members regarding the plan review comments and two RAC members regarding exercise evaluation comments.

Any significant deficiencies that continue to exist are identified in the attached table, which provides more detailed information on the type of deficiency and the schedule for corrections.

#### A. Assignment of Responsibility

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor.

A statement is needed in each county plan that clearly defines lead responsibilities after a state declaration of emergency. State law regarding declaration of disasters should be included in the plan. Planning responsibility for the ingestion pathway needs to be clarified. County plans should delineate functional responsibilities of support organizations. Cross-referencing in county plans needs improvement. A system should be described for distribution

of primary telephone numbers. The state plan should include a complete set of Agreement Letters from support organizations. The role of the U.S. Department of Agriculture needs to be stated.

During the exercise deficiencies noted including the following:

- o Rockland County should consider additional staffing for critical positions.
- o Putnam County needs back-up for the Civil Defense Director or Radiological Defense Officer. An additional emergency power supply is also needed.

2. State and county responses. The State submitted revised sections of the REPP in response to comments on this element. The Orange, Putnam and Westchester counties, except Rockland county, have committed to revisions in the plan that will clarify the division of responsibility and designation of lead roles. Additional agreement letters will also be obtained from support agencies, and procedures for coordination with the USDA will be included. Cross-referencing in the county plan will be improved, and will include designation of back-up personnel at support agencies. Deficiencies have been addressed by commitments of additional staff and equipment.

3. Determination of adequacy based on state and county response. Revisions of the State REPP submitted to the RAC still contain a conflict in primary organizational responsibility for transportation. Clarification of this functional responsibility will be necessary. In seeking agreements with support agencies, assurances should be obtained that the respective governmental units will, in fact, take appropriate actions in both exercises and emergency responses. This is not currently adequately addressed in the plans. The state and counties' responses regarding backup staffing and equipment will be adequate to resolve the deficiency if effectively carried out; however, little specific information has been given on coordination of state and counties in this effort. The minor deficiency is considered to remain until remedial actions are completed.

B. Onsite Emergency Organization

This section is not applicable to FEMA review.

C. Emergency Response Support and Resources

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor.

Agreement letters from support organizations in state and county plans are missing. Insufficient information is available in the state plan regarding use of federal resources. Interagency radio frequencies are not listed in the state plan, and a backup radio system for night hours is not addressed. Attention should be given in the plans for timely monitoring of the ingestion pathway to prevent accidental ingestion of contaminated water and foodstuffs. Some referencing of state procedures for support agency information is given incorrectly.

During the exercise, county representatives at the Emergency Operating Facility (EOF) did not have clearly defined roles. This function was deficient in Rockland County. In Rockland County, local support organizations needed greater involvement in development of emergency plans.

2. State and county responses. The state submitted revised sections of the REPP in response to comments on this element. The counties replied that sufficient support resources had been identified, but that additional agreement letters are being sought.

State responded to the need for more involvement of Rockland County support organization by stating that additional funding was needed to accomplish this, and estimated a November 1982 date for releasing of funds. However, the Rockland County Legislature directed all its employees not to participate in development of emergency plans.

3. Determination of adequacy based on state and county response. Revisions of the State REPP submitted to the RAC still do not adequately address State resources to support the Federal response. The backup radio system is available during working hours only. Facilities/resources for Federal use, and

identification of location for deploying Federal agencies, were insufficient. Provisions for ingestion pathway monitoring and missing agreement letters are not addressed; these items, therefore, continue to be considered minor deficiencies. Comments on the state performance during the exercise are adequately resolved by the state commitment to increase involvement of support organizations. Since the Rockland County Legislature decided to discontinue participation in the planning process, this deficiency remains uncorrected.

#### D. Emergency Classification System

The requirements of this planning standard were adequately addressed in the plans and demonstrated by the state and counties during the exercise.

#### E. Notification Methods and Procedures

1. Review of plans and exercises. Overall, deficiencies in this planning standard were considered significant. Methods and procedures for notification of emergency response personnel, and for notification and instruction of the populace within the plume exposure pathway Emergency Planning Zone (EPZ) were found to be deficient in the plans and during the exercise.

##### State Plans

- o The plan lacks procedures for contacting the U.S. Department of Agriculture (USDA) and the U.S. Environmental Protection Agency (USEPA).
- o Means for message verification with response organizations are not adequately addressed.
- o Sample emergency messages to be broadcast by EBS radio stations are not provided in the plan.
- o No sample of the public information pamphlet is included in the plan.

##### County Plans

- o Insufficient information is provided in the plans on use and coordination of the Emergency Broadcast System (EBS). Agreement letters authorizing Westchester County to issue EBS messages are not provided.

- o Sample emergency messages are insufficient in number and content.

During the exercise, incomplete functioning of the siren system and lack of backup alerting indicated significant deficiency in the counties. In addition, Rockland County needed more effective methods for initial call-out to emergency personnel and to local schools. In Westchester County, the ability to notify the transient population was found deficient.

2. State and county responses. The State responded to comments on procedures for contacting federal agencies by stating that this is a FEMA responsibility. The State disagreed with the need for message verification with the system used. The State procedures for the public information officers (PIO) will be revised to address use of the EBS, and also a public information program will be developed using a revised brochure, public meetings, and training sessions. The location of the Joint Media Center is to be reviewed. Westchester County stated that more sirens should be installed and that route alerting is impractical due to wide dispersion of the population in the 10-mile EPZ and lack of manpower. Orange County will consider route alerting for areas where ongoing testing by the utility confirms that sirens are inaudible. Rumor control procedures are to be developed by October 1982.

According to the State commitments for improvements in the initial call-out system in Rockland County were based on the availability of additional funds. However, Rockland County decided not to participate in the emergency planning process.

3. Determination of adequacy based on state and county response. Procedures for establishing contact with federal response organizations need to be thoroughly addressed in state plans. The training and revised procedures for PIOs should resolve the deficiencies noted, if effectively carried out. The revised State plan should include draft EBS messages that would be used after the governor's declaration of emergency. The EBS plan on file with FEMA appears out of date. Written agreements among counties for EBS use are currently lacking. Changes in EBS procedures should be fully described in the plans. The improvement of the initial call-out system on Rockland County will depend on availability of additional funding and willingness of the county to participate in the planning process.



The existing siren system requires further correction before it becomes fully operational. A FEMA acceptance test needs to be performed to determine if the siren system needs to be supplemented by other alert devices or route alerting.

After evaluation of the state and county responses, this significant deficiency is considered to remain.

#### F. Emergency Communications

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor. Provisions for prompt communications among principal response organizations to emergency personnel and to the public were found to be deficient in the plans and during the exercise.

##### State Plan

- o No telephone numbers are given for the 3rd and 9th U.S. Coast Guard (USCG) Districts or Conrail.
- o The State plan does not adequately address communications with the EOF or with field assessment teams.
- o There is no discussion of periodic testing of the entire communication system. Contact with the USDA should be added to the test.

##### County Plans

- o Alternative means of emergency communication for activation of the emergency response network are not described. Responsible individuals should be identified by title.
- o The plans do not adequately describe means and alternative means of communication between contiguous states and counties in the 50-mile ingestion exposure pathway.
- o Procedures for contact with Federal agencies are not described.
- o Means for communication with field teams should be described.
- o Alternative individuals for response agencies have been identified. The designated public information officer should be included in Procedure 1, Attachment 3 of the plans.
- o Communication links with fixed and mobile medical support facilities should be described.

- o Procedures for periodic testing of the communications system should be described.

During the exercise, the communication system in Rockland County was found significantly deficient. Rockland, Putnam, and Orange Counties experienced failures of communication equipment. Westchester County depended heavily on a commercial telephone system. Minor deficiencies included difficulty in communication between state and local accident assessment teams, and communications with other EOCs. The counties had not coordinated their contact with the USCG. The coordination and dispatch of buses for pick up of transit-dependent population observed during the exercise demonstrated the need for equipping of all evacuation buses with two-way radios capable of communicating with bus company dispatcher.

2. State and county responses. The State and county(s) have responded to the need for improved communications systems by installing backup radio systems and repairing the executive hot line. However, funding is not available at this time to take action on a number of the recommendations.

The state submitted revision pages to the REPP as their response to FEMA letter dated September 29, 1981. The revision pages do not address the lack of important telephone numbers, field communications systems, and periodic testing. The county(s) has also not addressed periodic testing, and has provided only general comments on clarification of communication links.

3. Determination of adequacy based on state and county response. The revision pages to the State REPP (Procedure B - Communications and Warning) still does not list the telephone numbers of Federal, contiguous state and private (Conrail/Amtrak) agencies. Furthermore, provisions for communications with field assessment teams could not be found in the revision pages furnished. County responses to plan comments do not adequately address problems identified. State and county responses to deficiencies noted during the exercise report the following improvements:

- o New York State Executive Hot Line is now operable to and from all four counties
- o Direct radio communications between the State Area Office (Southern District) and the four counties was reported operational in May 1982.

- o A backup radio system has been installed between the Rockland County EOC and EOF. An extension of the Radiological Emergency Communications (RECS) telephone system has been installed in the County Dose Assessment Room.

Other communications improvements will require funds not currently available. No commitment has been made to periodically test the entire communications by the State or counties. Such testing is considered essential in view of the improvements to be made in communications and the need to prioritize future systems additions. In light of the reported improvements in communications capability completed at the State and county level, the RAC has revised its assessment of deficiencies with respect to this planning standard from significant to minor. Plan and exercise deficiencies still remain uncorrected and require corrective action. Plan deficiencies will not be considered resolved until plan revisions are incorporated and equipment deficiencies will be considered as resolved until a test of the entire communications systems verifies system operability.

#### G. Public Education and Information

1. Review of plans and exercise. Overall, deficiencies in the planning standard were considered significant. Public education program and procedures for dissemination of information to the public were found to be deficient in the plans and during the exercise.

##### State Plan

- o No specific samples or schedules of public education programs are provided. USDA resources are not mentioned.
- o Some cross-referencing in the plan is incorrect.
- o Although the state plans commit to annual press briefings, no information is provided to indicate when and how this will be done.

##### County Plans

- o Information is lacking on distribution and follow-up of the public information brochure.
- o The method of assuring availability of public information/education materials to permanent and transient residents in the 10-mile EPZ is not described.

- o Procedures for exchange of information among PIOs is not described.
- o Rumor control procedures are not discussed adequately.
- o Procedures are not described for annual briefing of news media.

During the exercise, interviews with EPZ residents indicated a lack of awareness of the notification system, the Emergency Response Planning Area (ERPA) designations, and their individual responsibilities. The Joint Media Facility (JMF) was too small, in a poor location, and not adequately equipped. Briefings at the JMF were not always adequately attended by PIOs. Comprehensive rumor control procedures were lacking.

2. State and county responses. The state has submitted plan revisions in response to FEMA letter dated September 29, 1981. The State has described a program for rumor control to be tested during the next exercise on August 11, 1982 at Oswego, New York. The counties have also committed to development of rumor control procedures. Additional brochures have been mailed, and notification methods for transients are under development. Procedures for briefing of news media are in development. Implementation of a public education campaign must await funds and additional staffing.

3. Determination of adequacy on state and county response. Details of the public information program, news media briefings, and notification of transients have not been incorporated into the plans. Rumor control procedures also need to be described in state and county plans. The public education brochure is currently being reviewed by FEMA. Arrangements and procedures for the Joint Media Center need to be described in detail in the plans. Although the State and county have made commitments to improve public education, particularly for transients, significant deficiencies remain regarding compliance with this planning standard until the remedial actions have been completed.

#### H. Emergency Facilities and Equipment

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor.

The plan deficiencies noted related primarily to the coordination of field monitoring teams and field data. The State plan should be more specific on use of licensee radioiodine measurements and other field resources relied upon. Lists of emergency equipment need to be improved in all plans. The responsibility

for the Reuter-Stokes monitoring equipment described in county plans is unclear. County plans should address calibration of equipment and duties of trained field personnel. The chain of command for multi-agency monitoring teams should be described. The location of analytical equipment should be given. State responsibilities should be clearly referenced. All county plans have minor deficiencies in identifying use of personnel, transportation, and communications equipment for various response actions. Cross-referencing in county plans needs improvement.

State facilities during the exercise were good. Minor deficiencies related to space limitations at all county EOCs, and security problems at Rockland and Putnam. Communications and backup systems needed improvements at each EOC. Deficiencies were observed in instrumentation calibration procedures in Westchester County and in the space provided for accident assessment in Rockland Counties.

2. State and county responses. The State has responded that the licensee will have the responsibility for radioiodine monitoring unless additional funding is provided to the state for an independent program. The counties have replied that Reuter-Stokes equipment is the licensee responsibility. The counties have agreed to revise their plans to incorporate and update equipment lists, and to address transmittal of field data. Cross-referencing in county plans will be improved. Physical improvements in county EOCs have been made or planned, and security procedures revised. The counties cite the need for additional funding for identification cards and training.

3. Determination of adequacy based on state and county response. The physical modification of the facilities should help improve response capabilities, and improvements listed for the county plans will eliminate referencing deficiencies. However, procedures for coordinated use of field equipment and data among federal, state, and county agencies is not adequately addressed. Responsibility for the Reuter-Stokes system should be clarified. The deficiency noted for Westchester and Rockland Counties should be removed if the calibration program described is effectively carried out, and with provision for better working space in Rockland County. Other remaining minor deficiencies are those with regard to State radiological monitoring procedures and lists of equipment. New identification cards will be introduced only if the funds become available.

## I. Accident Assessment

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor.

The State REPP is insufficient in detail on use of field monitoring at each stage of an accident, allocation of facilities and resources to support a federal response and off-duty notification procedures. Since the State has no capability for monitoring radioiodine, plans for obtaining and analyzing such data should be described.

Minor deficiencies exist in the county plans concerning whether monitoring instructions have been developed in cooperation with the licensee and the Department of Energy, both of which would provide field teams. In general, specific information is lacking on standard operating procedures, transportation, communications, sample collection procedures, backup systems, and field team coordination. Cross-referencing is also inaccurate.

During the exercise, field data reported by county teams was not sufficient for correlation with dose projections. Equipment described in county plans was not used by the field teams. County teams used charcoal filters instead of silver zeolite filters for measuring radioiodine. Most county monitoring teams needed better training and improved equipment. Some of the response times for data collection and assessment were slow at the state and county EOCs. The state did not demonstrate independent field monitoring.

2. State and county responses. The licensee will be relied upon for radioiodine measurements, pending additional funding. Computer capability for dose calculations was described. Silver zeolite filters will be furnished to the counties by the State or utility when funds become available. The counties will revise their plans to describe transmittal of county field data. The counties will review the functioning and resources of field teams. Cross-referencing will be corrected. High-range instruments will be provided for the teams. Funds are being sought by the county to improve equipment, to expand the number of field teams, and to improve field communication and training of monitoring teams.

3. Determination of adequacy based on state and county response. The state and county are committed to review of plans and procedures and to make necessary revisions. The State has submitted revision pages to the REPP in response to RAC comments on the plan. The implementation of remedial actions will depend on availability of funds. Therefore, the deficiencies noted cannot be considered resolved until the remedial actions are completed.

#### J. Protective Response

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered significant. Actions to protect emergency workers and the public in the plume exposure EPZ were found to be significantly deficient in the plans and during the exercise.

The plans are inconsistent as to the authority for implementation of protective measures. The state is heavily dependent on assistance from the licensee and the Federal government. The State has decided not to provide thyroid blocking agents either to emergency workers or the general public. Provisions for use of radioprotective drugs, particularly for emergency workers and institutionalized persons is a criteria element of this planning standard. Failure to provide a means for protecting emergency workers from harmful thyroid radiation doses is a significant deficiency. The State REPP provides insufficient site-specific means for dealing with impediments to evacuation. Evacuation time estimates and traffic capacities, as described in NUREG-0654, FEMA-REP-1, Rev. 1, Appendix 4, are not available in the State or county plan. Measures to be used by the State for protection of the ingestion pathway are inadequately described; maps and lists of food processors and reservoirs either are not contained in the REPP or were not submitted for evaluation. Authority and capabilities for obtaining necessary information is not clearly defined. State and county procedures for monitoring of evacuees and control of contamination are not adequately described or referenced. County procedures for evacuation and alternative routes are not available where referenced. Means for notifying all segments of the transient and resident populations are not adequately described. Evacuation of non-institutionalized mobility-impaired persons is not addressed. Commitments from private and public bus operators are not available; locations and numbers of buses are not given. Some relocation centers are located too close to the plume exposure EPZ. Appropriate portions of State REPP should be referenced.

During the exercise, a lack of maps was noted at the state and some county EOCs. County actions to protect the mobility-impaired and to deal with impediments to evacuation could be improved. Some buses used in the simulated evacuation lacked radios and needed better maps and instructions concerning the routes and location of the reception centers. Some additional training in contamination monitoring would have been of benefit.

2. State and county responses.

The State will provide additional maps for the Albany EOC and for use in the counties. According to the State, some maps were not considered necessary since the information is available in other forms. Information in county plans will be referenced in state plans where appropriate. Information required by Appendix 4 of NUREG-0654, was provided to FEMA. Evacuation route data will be added to county plans. County procedures for identifying the mobility-impaired will be reviewed. Negotiations with bus companies are continuing, and host centers are being reviewed for adequacy. The counties felt more sirens were needed due to the difficulty of route alerting. The counties stated that resources were inadequate for proper evacuation guidelines. Procedures for registration and monitoring of evacuees will be reviewed and revised as necessary. County-owned buses will be equipped with radios by 1984, assuming funding is available. Westchester County is developing a workable traffic control system. The counties have requested additional funds for personnel training at relocation centers. More detailed disposal methods will be provided by the State.

3. Determination of adequacy based on state and county response.

Revisions in county plans will eliminate previously referenced deficiencies. The evacuation time estimates provided to FEMA have been reviewed and found to be adequate. Insufficient detail is provided in response to a number of the deficient items. Dates for remedial actions are not provided in some cases, and the State REPP revision pages do not provide the details necessary to correct plan deficiencies. When information is referenced as available elsewhere, that information was not provided for evaluation. Use of State resources is not adequately described in State REPP. Monitoring of evacuees is not adequately addressed in county plans.



The implementation of remedial actions related to the exercise deficiencies will depend, in most cases, on availability of funds.

After review of the state and county responses to the RAC comments on the plans and recommendations outlined in the Post Exercise Assessment, this planning standard is considered to be significantly deficient until the remedial actions are taken.

#### K. Radiological Exposure Control

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered significant. Means for controlling radiological exposure of emergency workers were found deficient in the plans and during the exercise. The State REPP does not specify present capabilities or target dates for contamination monitoring equipment acquisition. State and county plans do not mention permanent dose-recording devices, nor specify retention of dose records. Decontamination levels should be described in the plans. Medical facilities capable of personnel decontamination and care should be identified. Monitoring equipment, first aid kits, and procedures for waste disposal should be described more completely.

During the exercise, procedures for exposure control in Westchester County were considered deficient due to inadequate instrumentation (more sensitive self-reading dosimeters were needed) and inadequate decontamination procedures. No permanent record devices (e.g., film badges, TLDs) were available in the counties.

2. State and county responses. The state will supply permanent record devices and more sensitive self-reading dosimeters to the counties. Permanent record devices (TLDs) will be purchased when funds become available. The counties are developing record retention systems, and will review decontamination procedures. The counties claim insufficient personnel and equipment resources for decontamination of personnel and equipment and waste disposal. The authority for emergency workers to incur excessive dose will be clarified in the Putnam plan.

3. Determination of adequacy based on state and county response.

Since the supply of permanent record devices is contingent on future funding, this deficiency cannot be considered resolved. The implementation of remedial actions for decontamination action levels, disposal of contaminated liquid and solid wastes and monitoring equipment are not adequately addressed or counties does not have the personnel and resources to properly implement these remedial actions. The State has submitted revision pages to the REPP in response to FEMA letter dated September 29, 1981. The revision page pertaining to this planning standard lacks details of the permanent record keeping process. In general, recommended remedial actions are not described in sufficient detail to allow resolution of the items considered significantly deficient.

L. Medical and Public Health Support

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor, and related to lack of detail in the plans regarding qualified hospitals and other resources for treatment of contaminated individuals.

2. State and county responses. The State has agreed to provide training for medical support personnel. The county is reviewing lists of hospitals with radiological capabilities.

3. Determination of adequacy based on state and county response. The remedial actions noted should be sufficient to resolve the minor comments on this element. The revision pages to the REPP submitted by the State in response to FEMA letter dated September 29, 1981 did not address deficiencies cited in the RAC plan review comments. Therefore, the minor deficiencies will remain until the remedial actions are completed.

M. Recovery and Reentry Planning and Post-Accident Operations

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor. Deficiencies related to a lack of detailed information in state and county plans. The State plan does not establish a method for periodic estimates of total population exposure (person-rem).

The exercise provided only a limited demonstration of recovery and reentry procedures, with only a partial simulation of activities.

2. State and county responses. The counties felt that more time should be provided in future scenarios for detailed reentry activity. County plans will be revised to describe support available to the state.

3. Determination of adequacy based on state and county response. The State has not provided sufficient detail on recovery and reentry procedures. Revision pages to the State REPP provided to FEMA by the State in response to FEMA letter dated September 29, 1981 do not address deficiencies cited in the RAC plan review comments. The county has also provided no detail on the content of planned revisions; therefore, the minor deficiencies identified cannot be considered resolved.

#### N. Exercises and Drills

1. Review of plans and exercise. Overall, deficiencies in this planning standard were considered minor, and related to conflicts in county commitments to tests and lack of commitment to NRC/FEMA requirements. No provision is made for nighttime testing, testing in various weather conditions, or unannounced testing. State and county plans do not address implementation of test results. Observer qualifications should be listed. State plans should specify exercise planning materials to be provided to federal observers.

During the exercise, it was noted that regular exercises or drills would improve performance of county tasks.

2. State and county responses. The counties have committed to plan revisions to meet federal guidelines and to remove inconsistencies with state plans. Pre-exercise material will be provided prior to the exercise rather than being in the plan. The state will schedule pre-exercise drills. Funds for county participation in drills will be needed from the state legislature. Future exercises will consider use of actual meteorological data for a portion of the exercise.

3. Determination of adequacy based on state and county response. The state plan does not adequately describe the conduct of drills and exercises. Revision pages to the State REPP provided to FEMA by the State in response to FEMA letter dated September 29, 1981 do not address deficiencies cited in the RAC plan review comments. Commitments made by the counties will need to be evaluated when incorporated into the plans. The intent of state comments on

5 SUMMARY

Below is a summary of outstanding deficiencies after review of the State and County responses as discussed in Section 3, Evaluation of Emergency Preparedness, and concerns raised at public meetings outlined in Section 4, Public Meeting Highlights.

Planning Standard of NUREG-0654 FEMA-REP-1, Rev. 1	Standard ● Adequate ● Significant or ● Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C)County -Date-	
			Plans Revisions	Exercise Deficiencies
A. Assignment of Responsibility	Minor deficiency	<ul style="list-style-type: none"> <li>The deficiency is considered to remain until remedial actions are completed</li> </ul>	(S)08/01/82 and (C)10/01/82	11/01/82 (S,C)
B. Onsite Emergency Organization	THIS SECTION	IS NOT APPLICABLE TO FEMA REVIEW	N/A	
C. Emergency Response Support and Resources	Minor deficiency	<ul style="list-style-type: none"> <li>A backup radio system and provisions for ingestion pathway monitoring need to be addressed</li> <li>Rockland County has withdrawn from the planning process.</li> </ul>	(C)10/01/82	11/01/82 (S,C)
D. Emergency Classification System	Adequate	N/A	N/A	N/A
E. Notification Methods and Procedures	Significant deficiency	<ul style="list-style-type: none"> <li>Inadequate public alert and notification system (sirens) and use of EBS</li> <li>Procedures for the PIO need to be revised</li> <li>Inadequate call-out system in Rockland County</li> </ul>	(S)08/07/82 and (C)10/01/82	(S) 09/15/82 and (C) 10/01/82

Planning Standard of NUREG-0654 FEMA-REP-1 Rev. 1	Standard • Adequate • Significant or • Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C)County -Date-	
			Plans Revision	Exercise Deficiencies
F. Emergency communication	Minor deficiency	<ul style="list-style-type: none"> <li>• Delays in implementing remedial actions due to lack of funds</li> <li>• No commitment to periodic testing of the communication system</li> <li>• No adequate state response to comments on this element in the State REP plan</li> <li>• Delays in implementing remedial actions due to lack of funds</li> </ul>	(C)10/01/82	*various dates 12/01/82
G. Public Education and Information	Significant deficiency	<ul style="list-style-type: none"> <li>• Remedial action scheduled but not yet in place</li> </ul>	(C)10/01/82	(C)10/01/82 or (c)11/01/82
H. Emergency Facilities and Equipment	Minor deficiency	<ul style="list-style-type: none"> <li>• Lack of details on the action to be taken</li> <li>• Delays in implementing remedial action due to lack of funds</li> </ul>	(C)10/01/82	(C)10/01/82 on going
I. Accident Assessment	Minor deficiency	<ul style="list-style-type: none"> <li>• Delays in implementing remedial actions due to lack of funds</li> </ul>	(C)10/01/82	(C)10/01/82 or (C)11/01/82

Planning Standard NUREG-0654, FEMA-REP-1, Rev. 1	Standard ● Adequate ● Significant or ● Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C) County -Date-	
			Plans Revisions	Exercise Deficiencies
J. Protective Response	Significant deficiency	<ul style="list-style-type: none"> <li>● Lack of detail on the action to be taken</li> <li>● Delays in implementing remedial actions due to lack of funds</li> <li>● Ingestion pathway information not provided for review (maps, listings)</li> <li>● Refusal to provide KI or substitute protection for emergency workers</li> </ul>	(S)08/01/82 and (C)10/01/82	*Various dates June 1984
K. Radiological Exposure Control	Significant deficiency	<ul style="list-style-type: none"> <li>● Delays in implementing remedial actions due to lack of funds</li> <li>● Lack of details on the action to be taken</li> </ul>	(C)10/01/82	(C)11/01/82
L. Medical and Public Health Support	Minor deficiency	<ul style="list-style-type: none"> <li>● Remedial action scheduled but not yet in place</li> </ul>	(C)10/01/82	N/A
M. Recovery and Reentry Planning and Post-Accident Operation	Minor deficiency	<ul style="list-style-type: none"> <li>● Lack of details on actions to be taken</li> <li>● Lack of response from the State on remedial actions</li> </ul>	(C)10/01/82	Next exercise
N. Exercises and Drills	Minor deficiency	<ul style="list-style-type: none"> <li>● Lack of details on actions to be taken</li> <li>● Lack of response from the State</li> </ul>	(C)10/01/82	Next exercise

Planning Standard NUREG-0654, FEMA-REP-1, Rev. 1	Standard • Adequate • Significant or • Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C)County -Date-	
			Plans Revisions	Exercise Deficiencies
O. Radiological Emergency Response Training	Minor deficiency	• Delays in implementing remedial actions due to lack of funds	(C) 10/01/82	10/01/82
P. Respon- sibility for the Planning Effort	Significant deficiency	• Remedial actions schedul- ed but not yet in place • Withdrawal of the Rock- land County from the plan- ning process	(C) 10/01/82	N/A

\* Specific dates for specific deficiencies. The date appearing in this column reflects the date by which corrective action for an element taking the longest time, will be completed.

- parents will not follow plans that advise them not to transport their own children from their schools on the assumption that buses will remove the students.
- designated reception centers may not be prepared to carry out their functions.
- decontamination centers may not be adequately equipped.

The Westchester County Executive also addressed issues regarding this planning standard and noted three types of problems: The need for money to obtain necessary equipment; the lack of county control over emergency forces such as ambulance drivers, police, and fire fighters; the inability of buses to evacuate the people in the county within 7 - 9 hours.

K. Radiological Exposure Control. Questions were asked regarding the schedule for provision of additional monitoring equipment and protective gear for Orange County. Concern was expressed that facilities for radiological monitoring and decontamination in Westchester County may be inadequate.

L. Medical and Public Health Support. The adequacy of hospitals with radiological capabilities was questioned.

N. Exercises and Drills. The adequacy of the exercise simulation of treatment of a contaminated individual was questioned. Delays were seen in the implementation of comments on the exercise. Participants in the March 1982 exercise at Helen Hayes Hospital felt they were not kept informed on the progress of the simulated events.

O. Radiological Emergency Response Training. The Westchester County Executive addressed his concern regarding insufficient funds to pay for needed training emergency response personnel.



5 SUMMARY

Below is a summary of outstanding deficiencies after review of the State and County responses as discussed in Section 3, Evaluation of Emergency Preparedness, and concerns raised at public meetings outlined in Section 4, Public Meeting Highlights.

Planning Standard of NUREG-0654 FEMA-REP-1, Rev. 1	Standard ● Adequate ● Significant or ● Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C)County -Date-	
			Plans Revisions	Exercise Deficiencies
A. Assignment of Responsibility	Minor deficiency	● The deficiency is considered to remain until remedial actions are completed	(S)08/01/82 and (C)10/01/82	11/01/82 (S,C)
B. Onsite Emergency Organization	THIS SECTION	IS NOT APPLICABLE TO FEMA REVIEW	N/A	
C. Emergency Response Support and Resources	Minor deficiency	● A backup radio system and provisions for ingestion pathway monitoring need to be addressed ● Rockland County has withdrawn from the planning process.	(C)10/01/82	11/01/82 (S,C)
D. Emergency Classification System	Adequate	N/A	N/A	N/A
E. Notification Methods and Procedures	Significant deficiency	● Inadequate public alert and notification system (sirens) and use of EBS ● Procedures for the PIO need to be revised ● Inadequate call-out system in Rockland County	(S)08/07/82 and (C)10/01/82	(S) 09/15/82 and (C) 10/01/82

Planning Standard of NUREG-0654 FEMA-REP-1 Rev. 1	Standard • Adequate • Significant or • Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C)County -Date-	
			Plans Revision	Exercise Deficiencies
F. Emergency communication	Minor deficiency	<ul style="list-style-type: none"> <li>• Delays in implementing remedial actions due to lack of funds</li> <li>• No commitment to periodic testing of the communication system</li> <li>• No adequate state response to comments on this element in the State REP plan</li> <li>• Delays in implementing remedial actions due to lack of funds</li> </ul>	(C)10/01/82	*various dates 12/01/82
G. Public Education and Information	Significant deficiency	<ul style="list-style-type: none"> <li>• Remedial action scheduled but not yet in place</li> </ul>	(C)10/01/82	(C)10/01/82 or (c)11/01/82
H. Emergency Facilities and Equipment	Minor deficiency	<ul style="list-style-type: none"> <li>• Lack of details on the action to be taken</li> <li>• Delays in implementing remedial action due to lack of funds</li> </ul>	(C)10/01/82	(C)10/01/82 on going
I. Accident Assessment	Minor deficiency	<ul style="list-style-type: none"> <li>• Delays in implementing remedial actions due to lack of funds</li> </ul>	(C)10/01/82	(C)10/01/82 or (C)11/01/82

Planning Standard NUREG-0654, FEMA-REP-1, Rev. 1	Standard ● Adequate ● Significant or ● Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S)State/(C) County -Date-	
			Plans Revisions	Exercise Deficiencies
J. Protective Response	Significant deficiency	<ul style="list-style-type: none"> <li>● Lack of detail on the action to be taken</li> <li>● Delays in implementing remedial actions due to lack of funds</li> <li>● Ingestion pathway information not provided for review (maps, listings)</li> <li>● Refusal to provide KI or substitute protection for emergency workers</li> </ul>	(S)08/01/82 and (C)10/01/82	*Various dates June 1984
K. Radiological Exposure Control	Significant deficiency	<ul style="list-style-type: none"> <li>● Delays in implementing remedial actions due to lack of funds</li> <li>● Lack of details on the action to be taken</li> </ul>	(C)10/01/82	(C)11/01/82
L. Medical and Public Health Support	Minor deficiency	<ul style="list-style-type: none"> <li>● Remedial action scheduled but not yet in place</li> </ul>	(C)10/01/82	N/A
M. Recovery and Reentry Planning and Post-Accident Operation	Minor deficiency	<ul style="list-style-type: none"> <li>● Lack of details on actions to be taken</li> <li>● Lack of response from the State on remedial actions</li> </ul>	(C)10/01/82	Next exercise
N. Exercises and Drills	Minor deficiency	<ul style="list-style-type: none"> <li>● Lack of details on actions to be taken</li> <li>● Lack of response from the State</li> </ul>	(C)10/01/82	Next exercise

Planning Standard NUREG-0654, FEMA-REP-1, Rev. 1	Standard • Adequate • Significant or • Minor deficiency	Element remaining deficient for the reasons listed	Schedule of Corrective Actions (S) State/(C) County -Date-	
			Plans Revisions	Exercise Deficiencies
O. Radiological Emergency Response Training	Minor deficiency	<ul style="list-style-type: none"> <li>• Delays in implementing remedial actions due to lack of funds</li> </ul>	(C) 10/01/82	10/01/82
P. Respon- sibility for the Planning Effort	Significant deficiency	<ul style="list-style-type: none"> <li>• Remedial actions schedul- ed but not yet in place</li> <li>• Withdrawal of the Rock- land County from the plan- ning process</li> </ul>	(C) 10/01/82	N/A

\* Specific dates for specific deficiencies. The date appearing in this column reflects the date by which corrective action for an element taking the longest time, will be completed.