



Portland General Electric Company

July 30, 1982

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Director of Nuclear Reactor Regulation
ATTN: Mr. Robert A. Clark, Chief
Operating Reactors Branch No. 3
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Clark:

Radiological Emergency Response Planning

On October 9, 1980, the NRC denied a petition concerning the safety of the Trojan Nuclear Plant following a volcanic eruption of Mount St. Helens. In doing so, the Commission directed the NRC Staff to examine the effects of volcanic eruptions on emergency response planning at the Trojan site (Attachment 1).

In response to this request, the NRC Staff requested the Federal Emergency Management Agency, on November 3, 1980, to examine the effects of volcanic eruptions on State and local emergency planning around the Trojan site (Attachment 2). In the same letter, FEMA was also requested to examine the effects of earthquakes on State and local emergency planning around the nuclear power plant sites in California.

On December 1, 1980, FEMA forwarded the request to FEMA Region X (Attachment 3). However, this letter requested a study of the effects of both volcanic eruptions and earthquakes on State and local emergency planning within the region (ie, around the Trojan Nuclear Plant). This was apparently a misinterpretation of the NRC request. This misinterpretation has not been resolved and FEMA has requested information from PGE concerning seismic activity around the Trojan site (Attachment 4) and from the State and local officials regarding facilities which may be required in a radiological emergency (Attachment 5).

PGE has, in the meantime, had several discussions with both the NRC Region V office, (Mr. R. H. Engelken and Mr. Robert Faulkenberry) and your Mr. Charles Trammell concerning this problem with FEMA. Both Messrs. Faulkenberry and Trammell have informed PGE that they have

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Portland General Electric Company

Mr. Robert A. Clark
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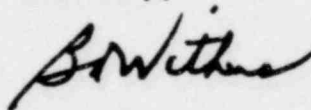
discussed the issue with B. K. Grimes of the Division of Emergency Preparedness who indicated to them there was no intent to perform any special investigation of the impacts of earthquakes on emergency planning for Trojan.

Discussions with FEMA Region X (Mr. Richard Donovan) indicate that the special seismic study for the area around the Trojan Nuclear Plant is being performed because of instructions from FEMA headquarters office under the auspices of the Earthquake Mitigation Act.

Performance of this study will require the expenditure of effort and funds by PGE and State and local government agencies to provide the information requested by FEMA. Subsequent effort may also be required to resolve the appropriate magnitude of earthquake to assume for emergency planning versus the licensed plant design basis. None of this effort is required by either NRC or FEMA regulations. There are no bases for performing such a study in the Northwest.

In light of this development, PGE requests your assistance to correct FEMA's misinterpretation of the NRC's original request on this issue.

Sincerely,



Bart D. Withers
Vice President
Nuclear

Attachments

c: Mr. Lynn Frank, Director
State of Oregon
Department of Energy

Mr. William Mayer, Director
Federal Emergency
Management Agency
Region X

FEDERAL EMERGENCY MANAGEMENT AGENCY

Washington D.C. 20472

December 1, 1980

MEMORANDUM FOR: Neale V. Chaney, Director
FEMA Region X

FROM: John W. McConnell *JWM*
Assistant Associate Director
for Population Preparedness

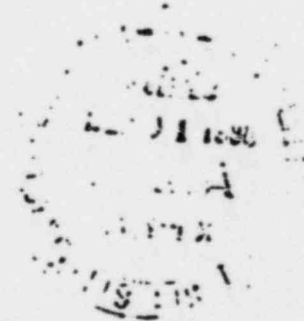
SUBJECT: Review of the Effects of Earthquakes and Volcanic
Eruptions on State and Local Radiological Emergency
Preparedness

The Nuclear Regulatory Commission has requested their licensees in the western States to consider the effects of earthquakes and of volcanic eruptions on the communication networks and evacuation plans around licensed facilities and review their emergency plans as appropriate.

In our discussions with Brian K. Grimes, Director of the NRC Emergency Preparedness Program Office, we have agreed that the FEMA Regions in the West (Regions IX and X) should also consider these events in the evaluation of State and local plans. We are interested in a qualitative evaluation of the complicating factors (e.g., disruptions of communications and evacuation routes) which might require special preparedness if such events occur in parallel with a radiological emergency or are involved in their initiation.

I see this as a reasonable part of FEMA's overall responsibility for comprehensive emergency management in an area where FEMA has had considerable near-term experience.

Accordingly, please plan to conduct the analyses of the interactions of severe geophysical events such as volcanic eruptions and earthquakes (giving due consideration to severe ashfall, mudflows, floods, landslides and associate communication and transportation disruptions) with the plans of State and local plans for REP around commercial power plants in your Region. In the near term, I would appreciate an outline of your study approach and a time schedule with milestone dates for completion. At a later date, we will also request consideration of the interactions of such geophysical events on the balance of non-commercial fixed nuclear facilities and with potential radiological accidents.



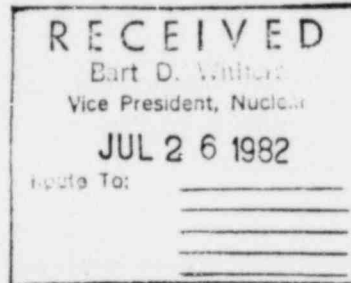


Federal Emergency Management Agency

Region X Federal Regional Center Bothell, Washington 98011

JUL 23 1982

Bart Withers, Vice President
Nuclear, Portland General Electric
121 S.W. Salmon Street
Portland, Oregon 97204



Dear Mr. Withers:

As you probably know, my National Office has requested us to perform a review of the effects of earthquakes on the capabilities of State and local governments to execute plans for radiological emergency preparedness (REP) around commercial and non-commercial nuclear power plants in our Region.

We requested and received permission to divorce this study from FEMA's REP approval process for offsite emergency response plans and preparedness. One of the reasons for requesting this disassociation was because of the study being performed by Dr. Weaver of the University of Washington. Dr. Weaver's study concerns a specific seismic zone originating near M. Hood, Oregon, and running north/northwesterly to near Olympia, Washington. We have awaited completion of this study so that we could review all possible concerns. After receipt of this study, we wrote the States of Oregon and Washington requesting that they identify structures that would be critical to the execution of their offsite preparedness plans.

Mr. Donovan of my staff informed Mr. Walt of PGE of this effort. Based upon that conversation and others, PGE has discussed the matter of our study with NRC Region V and NRC National Offices. NRC and FEMA have also discussed the subject in Washington. As a result of their conversations, we have been advised to continue with the study.

In order to expedite our consultant's efforts and reduce the potential expenditures, Mr. Donovan asked Mr. Walt if PGE could provide us access to the isoseismal maps prepared as part of your Preliminary and Final Safety Analysis Review with NRC. PGE has indicated that it is unwilling to do this. I would like you to review this request and reconsider our request for these maps.

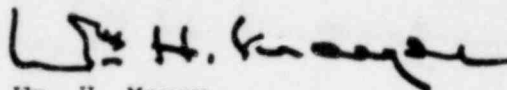
Our review and study is strictly limited to offsite preparedness. It is neither the intention or scope of the study to address seismic issues related to the Trojan Plant. However, in view of the findings of the Weaver study we feel it important that any potential impact on critical offsite facilities be investigated. Having access to existing isoseismal maps will not only result in cost savings to the government but will allow us to complete the study sooner by not having to redo the isoseismal maps.

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A single set of maps would give us a common basepoint from which to determine site-specific intensities. This is important as we would have to hire a separate consultant to develop new maps. If these maps are different from those used by PGE, then the issue can be raised as to which maps and seismic intensities are correct.

I would appreciate your reply by August 6, 1982. If you have any questions, please contact me or have your staff contact Mr. Donovan.

Sincerely,



Wm. H. Mayer
Regional Director

Trojan Nuclear Plant
Docket 50-344
License NPF-1

Robert A. Clark
July 30, 1982
Attachment 5
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Federal Emergency Management Agency

Region X Federal Regional Center Bothell, Washington 98011

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DEPT. OF ENERGY

Lynn Frank, Director
Department of Energy
Labor & Industry Building #111
Salem, Oregon 97310

Dear Mr. Frank:

Last spring and summer we exchanged correspondence on the issue of volcanic and earthquake related contingency planning as it pertains to your State and local plans and procedures for the Trojan Nuclear Power Plant.

You agreed to revise the State and county plans/procedures with respect to volcanic related contingencies. We asked and received approval from our National office to separate our evaluation of the earthquake issue from the volcano issue in the development of our findings for the Trojan Site.

A study recently prepared by Craig S. Weaver of the U.S. Geological Survey depicted a seismic zone originating near Mt. Hood in Oregon and running north/northwesterly to near Olympia, where high magnitude earthquakes at a shallow depth are possible. We have awaited completion of this paper so that we could finish our assessment.

In order for us to complete our vulnerability analysis of offsite structures, we need from you a list of structures that would be critical to the execution of your offsite preparedness plan for the Trojan Site. This list should include your EOC's, other necessary response centers, communication facilities, and any critical elements of the transportation network (e.g., bridges). Please specify the address, and reference the structures on either the 10-mile or 50-mile grid maps for the Trojan site, so that we may proceed. We need this information by August 2, 1982.

If you have any questions, you may contact Mr. Richard Donovan of my staff.

Sincerely,

Wm. H. Mayer
Regional Director

Copy to:

John T. DeFrance, Director
Columbia County Emergency Services

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



OFFICE OF THE
SECRETARY

October 9, 1980

MEMORANDUM FOR: William J. Dircks, Executive Director
for Operations

FROM: John C. Hoyle, Acting Secretary

SUBJECT: DD-80-26, TROJAN NUCLEAR PLANT: DENIAL
OF 2.206 RELIEF TO TROJAN DECOMMISSIONING
ALLIANCE (SECY-A-80-138)
(COMMISSIONER ACTION ITEM)

This is to advise you that the Commission has decided not to review the Director's decision denying the Trojan Decommissioning Alliance 2.206 request. However, in view of the strong possibility of continued volcanic activity of Mount St. Helens over the next few years, the Commission believes that further consideration should be given by the Director to the problems of evacuation during or soon after an eruption. Therefore, the Commission directs the staff to more closely examine, in conjunction with the Trojan plant evaluation for compliance with the new emergency planning regulations, 45 Fed. Reg. 55402 (August 19, 1980, effective November 3, 1980), the problems of effective protective measures and evacuation during or soon after an eruption, giving due consideration to the possible effects of severe ashfall, mudflows, floods, and landslides.

cc:
Chairman Ahearne
Commissioner Gilinsky
Commissioner Hendrie
Commissioner Bradford
General Counsel
Director, Policy Evaluation
Director, Nuclear Reactor Regulation
Executive Legal Director
Chief, Docketing & Service Branch, SECY

CONTACT:
E. W. McGregor (SECY)
41410

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NOVEMBER 9 1980

MEMORANDUM FOR: John McConnell, Assistant Associate Director for
Population Preparedness, FEMA

FROM: Brian K. Grimes, Program Director, Emergency Preparedness
Program Office, NRR

SUBJECT: REQUEST FOR FEMA ASSISTANCE TO REVIEW EFFECTS OF
EARTHQUAKE AND VOLCANIC ERUPTION ON STATE/LOCAL
EMERGENCY PLANS

As we have discussed, in the course of our review of licensed utility emergency plans, volcanic eruptions and catastrophic earthquakes have emerged as two issues of high public interest. To insure that these issues are being adequately addressed, we request that FEMA review the State and local planning efforts for the areas around California nuclear power plant sites and the Trojan site with respect to the complications which might arise in the event of extreme natural phenomena and how these can best be addressed in the planning process.

In conjunction with the Trojan plant evaluation for compliance with the new NRC emergency planning regulations, the Commission has directed that the problems of effective protective measures and evacuation during or soon after volcanic eruption (giving due consideration to the possible effects of severe ashfall, mudflows, floods, and landslides) be closely examined. In this regard, we are requesting the licensed utility to revise its emergency plan to explicitly address the possible problems associated with an eruption. This will include considerations of site access during an emergency, assured communications and appropriate revision of the evacuation time estimates used in protective action determinations. The Oregon State Department of Energy, has already addressed the feasibility of implementing effective protective measures during an eruption (enclosure 1).

The earthquake issue has particular relevance to nuclear plants in California (i.e., Diablo Canyon, Humboldt Bay, Rancho Seco and San Onofre). We understand from the FEMA news release of September 29, 1980 that FEMA will lead a team consisting of personnel from Federal, State and local agencies to accelerate efforts towards improving the state of readiness to cope with potential major earthquakes in California. In this regard we request that FEMA include in its evaluation of offsite emergency plans, a qualitative evaluation of complicating factors which might be caused by earthquakes for California nuclear power reactor sites. Specifically,

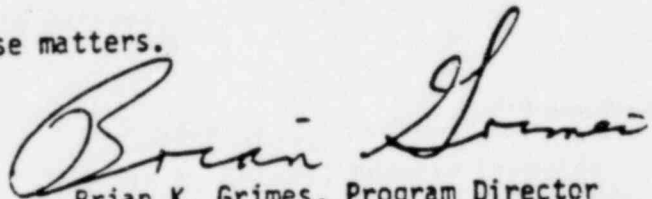
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John McConnell

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such evaluation should include the impacts on State/local emergency plans due to potential disruption of communications networks and evacuation routes. In this regard, we are requesting the affected licensees to revise their emergency plans to explicitly address the possible problems associated with an earthquake to include the type of potential complications discussed above for the Trojan facility.

Thank you for your assistance in these matters.



Brian K. Grimes, Program Director
Emergency Preparedness Program Office
Office of Nuclear Reactor Regulation

Enclosure:
Oregon DOE Study
Report Measures