



# Federal Emergency Management Agency

Washington, D.C. 20472

DEC 16 1993

50-289

Mr. Frank J. Congel, Director  
Division of Radiation Safety  
and Safeguards  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Congel:

This letter responds to your memorandum dated July 22, 1992, requesting the Federal Emergency Management Agency's (FEMA) assistance in responding to concerns expressed in the July 10, 1992, 10 CFR 2.206 petition submitted by Mr. Robert Gary of The Pennsylvania Institute for Clear Air to the Chairman of the U.S. Nuclear Regulatory Commission (NRC). Mr. Gary's petition questioned the adequacy of offsite emergency planning and preparedness in the Dauphin County portion of the Three Mile Island Nuclear Station emergency planning zone (EPZ). Specifically, Mr. Gary's petition cited a number of concerns regarding the Dauphin County Radiological Emergency Response Plan (RERP) which, in his opinion, render the plan "essentially non-operational." These concerns can be classified under the following three major areas:

1. The Dauphin County emergency operations center (EOC) failed to maintain letters of intent for the county's transportation providers.
2. The Dauphin County RERP lists out-of-date names and telephone numbers for the bus providers and lacks after-hours telephone numbers for those providers.
3. The Pennsylvania Emergency Management Agency (PEMA) and the Dauphin County RERPs fail to provide for the use of military vehicles in the event of a radiological emergency.

### Major Areas of Concern

Summarized below for each of the three major areas of concern is (1) PEMA's response to each concern as delineated in its letter dated July 12, 1993, from Mr. Joseph L. LaFleur, Director, PEMA, to Mr. Robert J. Adamcik, Chief, Natural and Technological Hazards Division, FEMA Region III, and (2) FEMA's analysis of PEMA's response to the identified concerns and applicable portions of the February 1993 Dauphin County plan. A copy of PEMA's letter dated July 12, 1993, is attached.

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1. The Dauphin County EOC failed to maintain letters of intent for the county's transportation providers.

PEMA's Response: PEMA has begun to place more emphasis on such documentation and to obtain letters of intent, in the form of Statements of Understanding (SOU), from its resource providers. PEMA's letter dated July 12, 1993, states that: "The letters of intent are valid commitments of that intent, although they are not, nor do they purport to be legal or legally enforceable documents which provide a guarantee of resources. With or without the letters of agreement, the resources will be available as previously demonstrated in numerous emergencies and exercises throughout the state."

FEMA's Analysis: PEMA has provided FEMA with SOUs dated September 1992 and October 1992 between Dauphin County and the three bus transportation providers. FEMA's review of these SOUs indicates that they meet the requirement of demonstrating the providers' intent to respond to emergencies. However, some refinement of these SOUs will be necessary for them to fully satisfy the recommendations outlined in the FEMA Office of General Counsel's April 30, 1993, memorandum entitled "Legal Opinion on Letters of Agreement."

FEMA is currently in the process of developing new policies and guidance based on the FEMA General Counsel's recommendations regarding the required content of letters of agreement, SOUs, etc. Subsequent to the issuance of the new policies and guidance, it will be transmitted to the FEMA Regions for coordination with and implementation by the States. The adequacy of all individual State and local governments' letters of agreement, SOUs, etc. would then be evaluated by FEMA to determine their compliance with the updated policy and guidance relative to the content of these documents. Under the General Counsel's current recommendations, future letters of agreement, SOUs, etc. at all commercial nuclear power plant sites across the Nation would generally need to:

- o State that the transportation provider will make the vehicles, with drivers, available for drills, exercises, and radiological emergencies.
- o Specify that drivers will be provided with appropriate emergency response training.
- o Contain information on the location of the transportation resources and 24-hour points of contact for notification and mobilization.

FEMA's analysis of the Dauphin County SOUs also identified some minor discrepancies, which PEMA intends to correct, between the plan and the SOUs and also identified some language which needs clarification. These discrepancies and areas needing clarification are as follows:

- o The names of the bus companies shown on the SOUs do not correspond to the bus companies named on page E-9-5 of the February 1993 Dauphin County plan. For example, Capitol Trailways, one of the bus companies named in the plan, is shown as Capitol Bus Company on the SOU. PEMA indicates that the bus company names have changed and that the appropriate changes will be made during the annual plan review and update of the SOUs so that the bus company names shown in the plan are consistent with those shown on the SOUs.

Under FEMA GM-PR-1, Policy on NUREG-0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements, October 1, 1985, State and local governments are required to review; update, as necessary and appropriate; and verify through the Annual Letter of Certification that the existing emergency response plans and Standard Operating Procedures (SOP), including SOUs, are current and reflect any plan revisions required to correct plan-related issues and inadequacies identified by FEMA at REP exercises and drills. FEMA will review the updated plans and SOPs, including SOUs, as soon as they are received to ensure that the above mentioned changes have been made and that they are consistent.

- o The SOUs do not indicate the average capacity of the buses which would be made available to the county. PEMA states that the SOUs will be changed to reflect the average capacity of the buses at the time of the SOU's annual update in 1993. FEMA will review the updated SOUs to verify this information.
- o The SOUs state that "transportation resources identified" will be updated annually under separate cover. This statement raises two basic issues that PEMA will need to address in the next SOU update.
  - (a) First, exactly what type of information is reflected by the "transportation resources identified" number? Does this number reflect the total number of buses owned by the bus company or the number of buses which would be made available to the county to meet identified transportation needs in the event of a radiological emergency at Three Mile Island? Realistically, it should reflect the latter number to facilitate the

county's accurate determination of its unmet needs, if any, for transportation resources. If that is the case, then the term "transportation resources identified" should be changed to "transportation resources available."

- (b) Second, it is not clear what is meant by the statement that "transportation resources identified" will be updated annually under separate cover. The method for updating this information needs to be clarified by PEMA. Regardless of how the information is updated, the information reflected in the plan should always be consistent with what is shown in the SOUs.

FEMA will continue to work with PEMA to (a) refine the SOUs in keeping with the recommendations of FEMA's Office of General Counsel and any future policies and guidance and (b) ensure, through the annual plan review and update of the SOUs, that the information presented in the SOUs is clear and consistent with that reflected in the current Dauphin County plan.

2. The Dauphin County RERP lists out-of-date names and telephone numbers for the bus providers and lacks after-hours telephone numbers for those providers.

PEMA's Response: PEMA has revised the Dauphin County RERP as of February 1993. PEMA updated the contact names and telephone numbers for bus providers. Since telephone numbers are not needed or intended to be shown in the county plan, PEMA moved this information to the SOPs for the applicable county staff persons.

FEMA's Analysis: Prior to the May 19, 1993, Three Mile Island exercise, FEMA Region III telephoned the three bus providers listed for Dauphin County and verified the contact names and telephone numbers, including off-hours numbers. Region III subsequently reviewed this information in the SOPs and verified its accuracy. In addition, during the May 1993 exercise, the Dauphin County transportation staff members were observed making actual telephone calls to the three bus companies--Capitol Trailways, Schlegel, and Capitol Area Transit. The staff ascertained the number of buses available from these companies and notified the municipalities that their unmet needs would be met. According to the plan, 56 buses would be needed to fill the municipalities' unmet needs, in addition to the 96 buses already available from county resources. PEMA was apprised of the county's unmet need of 56 buses and supplied (simulated) 56 buses from State resources--the D. R. Fisher, Rohrer, and Manson bus companies.

FEMA will continue to check the accuracy of this information during its annual review of the Dauphin County plan, SOPs, and SOUs and during the Three Mile Island biennial REP exercises.

3. The PEMA and the Dauphin County RERPs fail to provide for the use of military vehicles in the event of a radiological emergency.

PEMA's Response: Pennsylvania's emergency response plans do not rely upon military vehicles for the initial response during an emergency, because to do so would be more time-consuming than the process currently outlined in existing emergency response plans. Rather, the Pennsylvania Army National Guard (PAARNG) is used to support counties on a contingency basis for radiological and all other emergencies. PEMA's letter dated July 12, 1993, provides the following detailed information regarding the State and counties' acquisition and utilization of the PAARNG resources in the event of an emergency:

"The Pennsylvania Army National Guard (PAARNG) provides a battalion to assist each risk and support county. Each county plan, available at FEMA, has an appendix which includes the OPLAN appropriate for that county. Dauphin County happens to be supported by one battalion with backup as necessary by a second specified battalion. The units are directed to forward assembly areas (to be determined at notification plus two hours). It takes the units six hours to assemble and be prepared to move from their armories. Because the National Guard is not a first response organization, more definitive missions are not assigned, because they are secondary support systems in case of overload and manpower support for routine activity. Their specific tasks will be determined when the units become available and the needs of the county EMA have become solidified in light of the events as they unfold. The National Guard missions in support of civil authority are contingency oriented. The Guard is equipped with combat, combat support and combat service support vehicles and aircraft that do not lend themselves to the safe and orderly movement of civilians. For these reasons, the Commonwealth does not plan to use National Guard trucks to evacuate civilians. We have identified more than enough civilian bus assets to accomplish that task for the portion of the population that may not have a method of personal transportation.

The reasons for not using National Guard assets for evacuation were explained in person to Mr. Gary in an October 2, 1992 meeting with Senator Shumaker, of the Pennsylvania General Assembly, and Commissioner Sheaffer, Chairman of the Dauphin County Board of Commissioners. We further disabused him of the idea that the Army depots in the state had 'acres and acres of trucks' available for use in evacuations. The facts are that the military depots do not have assigned to them Table of Organization and Equipment truck companies. The depots rely primarily on commercial haulers and, occasionally, U.S. Army Reserve truck companies using flat bed trailers during their annual summer training. To provide a list of National Guard equipment that could possibly be deployed in the event of an evacuation at TMI is not necessary, because these assets would be called up as needed and could include very little or large portions of the PAARNG inventory, if they were appropriate which is doubtful. Such guess work would not improve the plan, nor would it approach any definable level of accuracy. The entire assets of state government are available in an emergency."

FEMA's Analysis: According to PEMA, the Dauphin County RERP and the computerized data base maintained at the State identify sufficient non-military sources of emergency transportation to meet the expected evacuation transportation needs of Dauphin County residents without calling upon the PAARNG. The State RERP and the February 1993 Dauphin County RERP specify that the PAARNG may provide assistance, such as emergency transportation, to the county in the event of a radiological emergency on an as-needed, mission basis. However, during the May 19, 1993, exercise, PEMA requested the PAARNG to provide as many ambulances as possible in response to a plan-identified Dauphin County unmet need of 203 ambulances. The PAARNG supplied (simulated) 60 ambulances. However, since PEMA's concept of operations does not rely on the PAARNG as a first response organization, the unmet ambulance need will be pursued as an issue with PEMA.

In view of (a) PEMA's statements that the PAARNG is not a first response organization, but rather a secondary or contingency-oriented responder, and that the Commonwealth does not plan to use PAARNG trucks to evacuate civilians and (b) the fact that the current RERPs imply a more direct role for the PAARNG, the current State and county RERPs should be reviewed and modified, as appropriate, to more clearly define the exact role of the PAARNG. PEMA will be requested

to address this issue during the next annual plan review to ensure that the plans clearly and accurately reflect the Commonwealth of Pennsylvania's concept of emergency operations relative to the use of the PAARNG.

#### Additional 10 CFR 2.206 Petition Questions

In addition to the three major areas of concern raised in the initial 10 CFR 2.206 petition, a number of questions were raised by Mr. Gary in subsequent correspondence with the NRC dated December 2, 1992; January 15, 1993; and February 14, 1993. This correspondence was forwarded to FEMA Headquarters for inclusion in its response to Mr. Gary's 2.206 petition. In reviewing FEMA Region III and PEMA's responses to Mr. Gary's additional concerns, FEMA Headquarters consolidated these concerns into nine questions. These questions are listed below. Information regarding PEMA's response to these questions, along with FEMA's analysis of PEMA's response and of applicable portions of the February 1993 Dauphin County RERP, is provided below each question in the same format used above for the three major areas of concern identified in the original 10 CFR 2.206 petition.

1. **Why are we 50 school buses short in Dauphin County and what does this mean for the affected residents?**

PEMA's Response: The unmet needs of the county can readily be supplied by assets identified from providers maintained in the computerized data bank in the State EOC. To engage in justifying the changing unmet needs with resources available to the State would place all concerned in an endless numbers chase. The provisions for fulfilling current unmet needs are part of the State EOC SOPs and are demonstrated and evaluated by FEMA during biennial REP exercises.

FEMA's Analysis: The February 1993 Dauphin County plan reflects an overall unmet county need for 56 buses. The county plan states that unmet county needs will be reported to PEMA. The State plan requires the Pennsylvania Department of Transportation to develop and maintain an inventory of statewide transportation assets for use in evacuating the risk counties. PEMA states that information about transportation providers is maintained in the computerized data banks at the State EOC and that the procedures for meeting the unmet county needs are part of the State and county SOPs. During the May 19, 1993, biennial REP exercise, the procedures for reporting and meeting the unmet county transportation needs were exercised. During this exercise, Dauphin County submitted a request for 56 buses to the State and the State responded to the county's request by identifying 56 buses which were

available from three bus companies maintained in the State's inventory of transportation assets.

2. What are the telephone numbers of the commanding and/or duty officers who would be called to activate the evacuation trucks? Where in the Dauphin County RERP can this information be found? Which military units are tasked with supplying vehicles for evacuation? Are designated drivers and company commanders identified by name? What type of briefings have these personnel received? Have specific trucks been designated for use in evacuating Harrisburg or other Dauphin County jurisdictions? Have staging area locations and evacuation routes for these trucks been delineated on Dauphin County maps?

PEMA's Response: Since the Pennsylvania plans rely entirely upon civilian vehicles for evacuation in the event of a radiological emergency, and military vehicles are only used if the PAARNG has been activated and evacuation assistance is specifically requested, it is not necessary or appropriate for the Dauphin County plan to include the type of information requested above.

FEMA's Analysis: FEMA agrees with PEMA's position. As stated above, PEMA will be requested to more clearly define the exact role of the PAARNG in the next plan review and update.

3. Has a mechanism been set up to coordinate the activation and use of the PAARNG with local officials?

PEMA's Response: The information is in the PAARNG's SOPs for all emergencies.

FEMA's Analysis: Two sections of the State RERP--"Department of Military Affairs (DMA)" on pages E-21 and E-22 and Appendix 13, "Military Support,"--also contain information on the use of the PAARNG, on an "as needed basis," in radiological emergencies. However, information pertaining to the specific mechanisms for requesting the PAARNG's assistance is not clearly presented in these plan sections. Essentially, the State plan outlines two different procedures to be followed when a county requests the PAARNG's assistance, but fails to clearly identify the circumstances triggering each procedure.

In addition to the State plan's lack of clearly differentiated procedures for processing county requests for PAARNG assistance, the plan does not indicate, upon the Governor's ordering of the PAARNG to State active duty, whether (a) the PAARNG is activated for, and battalions are deployed to, all risk counties, even if they have not

requested PAARNG assistance, or (b) a battalion is deployed to a risk county only after it has submitted its initial request for PAARNG assistance. If option (a) is correct, then there could be a situation where a risk county's battalion is already in place and that risk county's initial request for assistance would be directed to the battalion through the county's PAARNG representative, rather than to the State through the county DMA liaison officer. This portion of the State plan needs to be revised to clearly outline the procedures to be followed in activating the PAARNG and processing county requests for PAARNG assistance.

Appendix 8 of the Dauphin county plan outlines the role of the PAARNG in radiological emergencies and contains a copy of the PAARNG plan, entitled "OPLAN 3-109 IN, Operation Nuke II - Dauphin County." This plan describes the PAARNG's procedures for mobilizing and executing support to Dauphin County in the event of an incident at Three Mile Island. However, the county plan does not indicate the procedure to be followed by the county when requesting PAARNG assistance. The Dauphin County plan also specifies that, after PAARNG activation, the PAARNG will provide direct support to the county and send liaison personnel to the county EOC. Although the State plan, page E-22, specifies that the State DMA Emergency Preparedness Liaison Officer will supply a DMA representative to the risk counties to coordinate requests for PAARNG assistance, the Dauphin County plan does not specify that the State will provide a DMA representative, describe the role of this representative, or distinguish between the functions of the DMA representative and the PAARNG liaison personnel.

The county plan should be revised to specify:

- o The procedures for processing the county's initial request for PAARNG assistance and requests for assistance after the PAARNG has been activated.
  - o That DMA and PAARNG representatives will be deployed to the county EOC, the entity responsible for their deployment, the circumstances under which they will be deployed, and their functions at the county EOC.
4. Are there any maps which indicate that the PAARNG will be activated for evacuation purposes, rather than for peace-keeping purposes?

PEMA's Response: The information is in the PAARNG's SOPs for all emergencies.

FEMA's Analysis: Information concerning the missions for which the PAARNG can be activated is also found in

Appendix 8 of the February 1993 Dauphin County plan. Appendix 8 states that, once the Governor has ordered the PAARNG to State active duty, the PAARNG will provide direct support to the county to perform a variety of radiological emergency response missions as a supplement to the county's resources. Most of these missions, such as traffic control, emergency transportation, emergency fuel on evacuation routes, and emergency clearing of roads, are evacuation-related, not peace-keeping missions. A specific PAARNG battalion (3rd Battalion, 109th Infantry) and a back-up PAARNG battalion are assigned to Dauphin County for these potential missions.

5. What is PEMA doing to supervise the counties and to ensure that they are in compliance with standard procedures for emergency readiness? Is PEMA in violation of its founding statute (Title 35, Pennsylvania Consolidated Statutes, Section 101) which calls for PEMA to backstop the counties and build two warehouses and stock them with emergency supplies?

PEMA's Response: During an October 2, 1992, meeting attended by Mr. Gary; Senator Shumaker of the Pennsylvania General Assembly; Commissioner Sheaffer, Chairman of the Dauphin County Board of Commissioners; and Mr. Joseph LaFleur, Director, PEMA, the level of supervision by PEMA of the counties and PEMA's actions to provide supplies and equipment to the counties during emergencies were discussed with Mr. Gary. In addition, PEMA's General Counsel, in a July 15, 1992, letter to Mr. Gary, responded to Mr. Gary's specific earlier question as to why the two regional warehouses cited in Title 35 have not been established by stating that (a) the legislature has not allocated funds for this purpose, even though the requirement is in the law, and (b) such expensive facilities are ill-advised, since PEMA has stockpiles of emergency supplies at other departmental facilities, such as Torrence State Hospital and Pike Center.

FEMA's Analysis: FEMA agrees with PEMA's position. A copy of the letter from PEMA's General Counsel dated July 15, 1992, is attached.

6. Are there deficiencies in the county plans, similar to the failure to maintain current information on bus company contacts and their telephone numbers, which PEMA does not know about? If there might be such deficiencies, what steps are being taken to review these plans for adequacy?

PEMA's Response: The cycle of plan reviews and updates was explained to Mr. Gary at the October 2, 1992, meeting. The plans are viewed as "living documents" which are never considered finished and are changed as the need arises.

FEMA's Analysis: FEMA's review of the February 1993 Dauphin County plan's provisions for emergency transportation identified omissions and discrepancies with respect to the plan's transportation and ambulance resource numbers. FEMA will continue to review the annual plan revisions to identify areas of required and recommended plan improvements. In addition, FEMA will thoroughly review all the Three Mile Island plans, including the Dauphin County plan, when they are submitted by the Governor of Pennsylvania for the formal 44 CFR 350 plan review and approval.

7. Why has PEMA not been more aggressive in seeking resources from the Pennsylvania General Assembly? In order to assist the counties in planning for and executing evacuation logistics, why does PEMA not obtain more resources from the General Assembly or the nuclear licensees and make distributions of these resources to the counties?

PEMA's Response: At the October 2, 1992, meeting, Mr. LaFleur explained to Mr. Gary that there is insufficient justification from the counties to ask the utility rate payers to assume the additional \$5,000,000 in costs advocated by Mr. Gary to support county radiological emergency response activities. Pennsylvania's Senator Shumaker strongly stated that he could not and would not place such a burden on rate payers when Pennsylvania was in the throes of a serious economic recession. PEMA has requested, both through State government channels and from the utilities, more funds to meet the costs of the REP Program. However, the utilities have stated that they are reluctant to provide more stockholder or rate payer funds to PEMA.

FEMA's Analysis: FEMA believes that PEMA has taken reasonable steps to acquire additional resources.

8. Is a strictly delineated 10-mile emergency planning zone reasonable for Three Mile Island, considering that a highly populated area, the capitol city of Harrisburg, is just outside the 10-mile limit and is, therefore, excluded from PEMA's evacuation plans?

PEMA's Response: The 10-mile EPZ concept is based upon NRC and Environmental Protection Agency studies which indicate that the area affected by significant radiation exposures from a nuclear power plant accident would be limited to an area within 10 miles of the plant. The emergency response organization within 10 miles of Three Mile Island can be extended beyond 10 miles if conditions warrant. Also, Pennsylvania already maintains the most conservative evacuation policy--360' of the entire 10-mile EPZ--within

the United States. PEMA's letter dated July 12, 1993, states that "...unless FEMA and the NRC are willing to state publicly for the record that the 10-mile EPZ is inadequate and that exceptions must be made for Harrisburg and other similar EPZs near large population centers, the PEMA will continue to follow NRC and FEMA guidance regarding such planning. Harrisburg believes...that they could handle their population if there was a widespread evacuation. The state concurs."

FEMA's Analysis: FEMA agrees with PEMA's interpretation of the guidance governing the size of the 10-mile EPZ. It should be noted, however, that Steven R. Reed, Mayor of Harrisburg, indicated in a February 8, 1993, letter to Mr. Gary that contiguous areas to the 10-mile EPZ in the City of Harrisburg would also begin to evacuate, if the 10-mile EPZ was evacuated due to a radiological emergency at Three Mile Island. The Mayor also noted in his letter that the City of Harrisburg has identified and would be able to mobilize sufficient resources to support the evacuation of both Harrisburg's portion of the 10-mile EPZ and the contiguous areas of Harrisburg to the north. In his January 15, 1993, memorandum to the NRC, Mr. Gary stated that he found PEMA's position of following NRC/FEMA guidance, instead of taking the initiative and including the entire City of Harrisburg in the 10-mile EPZ and RERPs, to be unacceptable. During a December 1, 1993, meeting of FEMA and NRC staff members with Congressman George W. Gekas of Pennsylvania's 17th District, which includes the Three Mile Island site, Mr. Robert A. Erickson and Mr. Falk Kantor from the NRC's Emergency Preparedness Branch discussed the technical basis and rationale for the establishment of the 10-mile EPZ requirement in NRC regulations.

9. What standard does PEMA seek to meet in its emergency preparedness drills? Are the drills purporting to test the equipment or the emergency responders? If the drills are to test the responders, then they should be unannounced and held at various times of the day and night and, therefore, more closely approximate an actual emergency event.

PEMA's Response: During the October 2, 1992, meeting, PEMA explained to Mr. Gary that, due to funding limitations, Pennsylvania relies heavily on volunteers to staff the county and municipal EOCs and schedules the biennial REP exercises in the late afternoon to accommodate these volunteers. Although the volunteers would be willing to respond to an actual emergency at any time, they cannot afford to leave their regularly scheduled work activities for an exercise. Mr. Gary made it clear at the October 2, 1992, meeting that he wanted to impose upon the radiological emergency response program the same response standards as

those maintained by active military units. PEMA believes that it is not feasible to apply military standards to a civilian system which relies significantly upon volunteers.

FEMA's Analysis: FEMA agrees with PEMA's position. It should be noted that under FEMA-REP-14, Radiological Emergency Preparedness Exercise Manual, September 1991, all offsite response organizations (ORO) are required to demonstrate their emergency response capabilities in an unannounced mode (Objective 32 - Unannounced Exercise or Drill) and in an off-hours mode (Objective 33 - Off-Hours Exercise or Drill) once every six years through an unannounced and off-hours exercise or drill. Off-hours exercises or drills require OROs to demonstrate the capability to respond between the hours of 6:00 p.m. and 4:00 a.m. on weekdays or any hours on weekends. The unannounced and off-hours objectives were most recently demonstrated at Three Mile Island on June 26, 1991.

Subsequent to the filing of the 10 CFR 2.206 petition, Mr. Gary raised two additional issues during a telephone conversation with the NRC. Although these issues are not considered by the NRC to be a part of the original 10 CFR 2.206 petition, they were addressed by PEMA in its overall response to the 10 CFR 2.206 petition. The two issues and PEMA's responses are presented below:

1. The population numbers in the Dauphin County plan do not reflect current (1990 Census data) population figures.

The February 1993 Dauphin County plan contains 1990 Census population data.

2. Evacuation time estimates have not been revised since the early 1980s.

A new evacuation time estimate study is being prepared by the licensee's contractor. A draft has been completed and the final study should be completed by mid-1994. The new evacuation time estimates will be included in the 1994 update of the Three Mile Island plans and procedures.

Recognizing that (1) RERPs are dynamic, living documents which are always being changed and updated through the annual review process to reflect changes in the EPZ, emergency management policies, and organizational relationships and (2) PEMA is actively engaged in the development and refinement of RERPs for all of its sites in compliance with established FEMA/NRC planning standards, FEMA believes that the offsite emergency planning issues identified by Mr. Gary in the 10 CFR 2.206 petition are being satisfactorily addressed. This assessment is based on PEMA's response to the specific issues raised and its continuing

efforts to refine the plans and correct plan inconsistencies and inadequacies as well as on FEMA's review of the plans and supporting materials. Based on the factors listed below, FEMA concludes that the offsite radiological emergency response plans and preparedness for the Three Mile Island Nuclear Station are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the public health and safety in the event of a radiological emergency at Three Mile Island. The factors are:

1. PEMA's continuing efforts in the development, revision, and refinement of the Three Mile Island RERP.
2. FEMA's review of the concerns identified in the 10 CFR 2.206 petition and related correspondence and PEMA's response to those concerns.
3. The results of the May 19, 1993, Three Mile Island exercise as presented below:
  - o There were no Deficiencies identified at the exercise.
  - o The draft exercise report, received at Headquarters on August 27, 1993, identified 40 Areas Requiring Corrective Action (ARCA), six Planning Issues, and three Areas Recommended for Improvement (ARFI). Four ARCAs and one Planning Issue were identified for Dauphin County and one ARFI was identified for the Dauphin County Mass Care, Monitoring, and Decontamination Center. These issues did not pertain to the concerns raised by Mr. Gary in his petition.
  - o Headquarters is in the process of reviewing and providing comments on this 340-page, draft exercise report. Headquarters' comments will identify several additional State/Dauphin County ARCAs and Planning Issues pertaining to procedures used by the State and county to fill unmet evacuation transportation needs. The exercise performance also indicated some areas in which the plans and procedures for this process need clarification. The revision of these plans and procedures will improve the State and county's ability to respond to, and verify the resolution of, unmet needs.

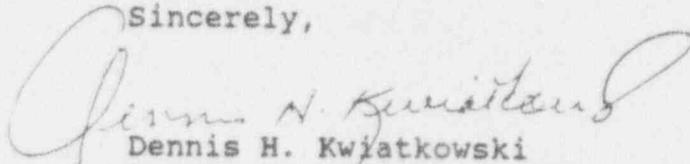
The State has also received a copy of the draft exercise report and has responded to the inadequacies identified in the report. FEMA Region III will monitor the State and local governments' correction of all exercise inadequacies.

In closing, FEMA reiterates that it will continue to closely review the offsite plans and SOPs, including SOUs, for Three Mile

Island. Appropriate technical assistance will also be provided to PEMA to ensure that the necessary revisions and updates are made in a consistent, timely, and orderly manner.

Should you have any questions regarding the foregoing material and attachments or require further information, please call Mr. Joseph A. Moreland, Director, Exercises Division, at (202) 646-3544.

Sincerely,



Dennis H. Kwiatkowski  
Deputy Associate Director  
Preparedness, Training, and  
Exercises Directorate

Attachments

cc: Congressman George W. Gekas  
FEMA Region III



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BOX 3321  
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July 12, 1993

Mr. Robert J. Adamcik  
Chief, Natural and Technological  
Hazards Division  
Federal Emergency Management Agency,  
Region III  
Liberty Square Building (Second Floor)  
105 South Seventh Street  
Philadelphia, PA 19106

Dear Mr. Adamcik:

This responds to your letter of April 30, 1993, regarding Mr. Gary's 10 CFR 2.206 petition about offsite Radiological Emergency Response Planning issues for Three Mile Island Nuclear Station.

Perhaps FEMA headquarters could have been more selective in requesting information. The breadth of the information net went far beyond the issues of interest or those which have been previously addressed by the Pennsylvania Emergency Management Agency to the Federal Emergency Management Agency. Much of Mr. Krimm's April 12, 1993, memorandum does not pertain to Robert Gary's petition (see Federal Register Vol. 57, No. 157 Thursday, August 13, 1992, pgs. 36415-36416). I will indicate where the issues raised have already been addressed either to FEMA or to Mr. Gary directly. The following comments are keyed to the paragraphs beginning on page three of Mr. Krimm's April 12, 1993, memorandum to Acting Regional Director Thomas.

- 1a. The recapitulation of Dauphin County transportation resource needs is found on page E-9-14 of Annex E, Radiological Emergency Response Procedures to Nuclear Power Plant Incidents, Dauphin County Emergency Operations Plan, which has been provided to FEMA III. These numbers change as the plan is periodically updated. The unmet needs of the county can readily be supplied by assets identified from providers maintained in the computerized data banks in the State Emergency Operations Center. To engage in justifying the changing unmet needs with resources available to the state would place all concerned in an endless numbers chase. The provisions for filling current unmet needs are part of the State EOC Standing Operating Procedures and are demonstrated under FEMA evaluation during biennial exercises. The May 1993 TMI exercise provided good demonstration of this fact. FEMA's exercise records for the unmet need for ambulances is a good example for the petitioner.
- 1b. Not all ambulance services operate 24 hours per day, hence via referral, they correctly have the caller talk to "9-1-1" in the case of an emergency. The county, however, has the radio pager number of the person on call for each ambulance company for

24-hour recall purposes. The statement that "The significance of and rationale for certain ambulance service calls being referred to 911 should be ascertained and appropriate explanatory narrative and/or modifications incorporated into the plans. All revised plans materials should be provided to FEMA Region III and Headquarters for review," does not acknowledge the common practices used all over the U.S.

There is nothing terribly new or esoteric about the use of pagers to summon emergency response personnel. FEMA is aware of many such technologies for emergency response.

Additionally, the assertion that referral of calls for non-24 hour emergency services to 9-1-1 "is unacceptable" is specious and without merit. Pennsylvania has been embarked on a program for several years to expand 9-1-1 coverage throughout the Commonwealth. Eight million of the nearly 12 million citizens in the state are served by 9-1-1. This involves 30 counties, three municipalities, and one regional system. Experience has proven that pagers controlled by centralized county (9-1-1) dispatchers provides an extremely rapid alert and notification system that represents the state of the art. The revenues from 9-1-1 line charges currently provide \$52,000,000 per year to support public safety within the state. We have no intention of abandoning a common national practice of employing modern and efficient alert systems. This is not a part of the 2.206 petition.

- 1c. In my November 4, 1992 letter to Region III, I explained that "Reliance upon military resources for the initial response during an emergency would be more time consuming than the current system." The Department of Military Affairs (DMA) provides liaison personnel to the State EOC and the risk and support county EMAs. The Pennsylvania Army National Guard (PAARNG) provides a battalion to assist each risk and support county. Each county plan, available at FEMA, has an appendix which includes the OPLAN appropriate for that county. Dauphin County happens to be supported by one primary battalion with backup as necessary by a second specified battalion. The units are directed to forward assembly areas (to be determined at notification plus two hours). It takes the units six hours to assemble and be prepared to move from their armories. Because the National Guard is not a first response organization, more definitive missions are not assigned, because they are secondary support systems in case of overload and manpower support for routine activity. Their specific tasks will be determined when the units become available and the needs of the county EMA have become solidified in light of the events as they unfold. The National Guard missions in support of civil authority are contingency oriented. The Guard is equipped with combat, combat support and combat service support vehicles and aircraft that do not lend themselves to the safe and orderly movement of civilians. For these reasons, the Commonwealth does not plan to

use National Guard trucks to evacuate civilians. We have identified more than enough civilian bus assets to accomplish that task for the portion of the population that may not have a method of personal transportation.

The reasons for not using National Guard assets for evacuation were explained in person to Mr. Gary in an October 2, 1992 meeting with Senator Shumaker, of the Pennsylvania General Assembly, and Commissioner Sheaffer, Chairman of the Dauphin County Board of Commissioners. We further disabused him of the idea that the Army depots in the state had "acres and acres of trucks" available for use in evacuations. The facts are that the military depots do not have assigned to them Table of Organization and Equipment (TO&E) truck companies. The depots rely primarily on commercial haulers and, occasionally, U.S. Army Reserve truck companies using flat bed trailers during their annual summer training. To provide a list of National Guard equipment that could possibly be deployed in the event of an evacuation at TMI is not necessary, because these assets would be called up as needed and could include very little or large portions of the PAARNG inventory, if they were appropriate which is doubtful. Such guess work would not improve the plan, nor would it approach any definable measure of accuracy. The entire assets of state government are available in an emergency.

Because of their purposely limited nuclear power plant mission orientation, full training schedule and turnover rate, PAARNG soldiers need not receive "civilian radiological" training beyond that provided in their Army annual training program.

- 2a. The substance in the letters of intent, statements of understanding or similar documents is valid. The names of the bus companies have changed and will be revised in the plan as well as the letters during the periodic reviews. The correct names now are: Hugins Valley Lines, Inc. (formerly Schlegel Transportation Service); Capital Bus Company (Capital Trailways is the corporate name); and Capital Area Transit Bus Company (vice Capital Area Transit).
- 2b. The letters of intent do indicate the number of buses each company would make available. The letters of intent will be changed to reflect the average capacity of those busses by their annual update.
- 2c. There is no specific training provided for bus drivers, nor is there any required in NUREG-0654 FEMA-REP-1. Bus drivers departing the EPZ during an evacuation are a part of the general public, which also receives no specific training. Dosimetry will not be issued to bus drivers, because they will not be reentering the EPZ and they are not emergency workers.

The April 16, 1992, FEMA Headquarters memorandum subject: Sample Letters of Agreement for Transmittal to the Pennsylvania Emergency Management Agency (PEMA) in Connection with the Susquehanna Steam Electric Station Offsite Radiological Emergency Response Plan Review, that was transmitted to PEMA by the Region III letter of May 1, 1992, contained 17 examples of letters of agreement that were to assist the PEMA "... in preparing pertinent letters of agreement for inclusion in the offsite radiological emergency response plans, site-specific to the Susquehanna Steam Electric Station (SSES)." Only two of these examples made the vaguest references to training. None of them used the language prescribed by the FEMA Headquarters April 12, 1992, memorandum to Region III to wit:

- "Review of the SOUs indicates that there is no reference to the training of bus drivers in regard to dealing with emergency response situations."
- "... the drivers should be trained and educated about the nature of radiological emergencies, the proper use of dosimetry, etc."
- "... the SOUs should contain a statement that the company agrees to cooperate with the utility and State and local governments by allowing its drivers adequate time to participate in pertinent radiological response training and exercise-related activities required under NUREG-0654/FEMA-REP-1, Revision 1, and outlined in Three Mile Island's State and Radiological emergency response plans." (Note that the State and local plans for TMI do not outline driver training as described above.)

As we have discussed on several occasions, Pennsylvania is clearly being reviewed at a higher standard than other "nuclear states" that is unnecessary, but most important, does not apply in the case of Dauphin County bus assets.

- 2d. The letters of intent are valid commitments of that intent, although they are not, nor do they purport to be legal or legally enforceable documents which provide a guarantee of resources. With or without letters of agreement, the resources will be available as previously demonstrated in numerous emergencies and exercises throughout the state.

As described in paragraph 2c above, the FEMA Headquarters prescriptive language in paragraph 2d does not appear in any of the sample SOUs provided to wit: "The language in the SOU should reflect the provider's understanding that (A) adequate vehicles and drivers are available to meet the resources enumerated in the SOU and (b) drivers are fully aware of and understand their individual responsibility to drive a bus, if required, to facilitate an evacuation of Dauphin County in the event of a radiological emergency at Three Mile Island." Again, the topic FEMA is researching is not germane.

- 3a. There is neither reason nor intention to add phone numbers to the various pages of the County Radiological Procedures. The phone numbers are available in SOPs used by the respective county staff persons. In addition, as mentioned in paragraph 1b above, the county has the ability to tone page all ambulance organizations. This issue was not raised in Mr. Gary's 10 CFR 2.206 petition as described in the Federal Register of August 13, 1992.
- 3b. The items listed in this paragraph constitute administrative updates that are being addressed and will be cleared up at the next annually required update. Again, this issue was not raised in the 2.206 petition.
- 3c. This will be clarified at the next plan update.
- 3d. It is not necessary to label pages E-7-11 and E-9-3 through E-9-5 to "... indicate clearly that the information reflected on these pages pertains to Dauphin County." Since the pages are in the Dauphin County Plan and list specific Dauphin County unique organizations, to what other county could they possibly be referring? This is a matter of style that surely can be left to the county's discretion.
- 3e. Your planning suggestions, while not a part of the 2.206 petition, are appreciated and will be considered at the next plan update.
4. You correctly noted that these items are not a part of the 2.206 petition. For your information, 1990 population data is reflected in the current February 1993 Dauphin County Annex E (for example see E-10-2). As the 1990 census data is produced by the U.S. Census Bureau and provided to the Penn State Data Center, the information is processed and provided to the county for inclusion in the subsequent update of the plan and procedures. The Evacuation Time Estimate is being prepared by the power plant contractor. The process began in July 1992 and is estimated to be completed in August 1993. The new numbers will be included in the next regularly scheduled update of the plans and procedures as per normal practice.
5. Mr. Gary's questions are not relevant to the 2.206 petition. Even more pertinent to the proceedings is the fact that they are irrelevant to the current plans for the evacuation of the TMI plume exposure pathway emergency planning zone. As stated earlier (see para 1c above), the Commonwealth does not need to include the PAARNG in the way sought by Mr. Gary since it is not germane. The questions in paragraph 5, answered above, are in the SOPs of PAARNG for all emergencies or do not apply.
- 6a. There is no red tape factor that prevents the inclusion of PAARNG in PEMA's plan for evacuation in the event of a radiological emergency. As explained in paragraph 1c above, the use of Army trucks for evacuating civilians is a poor option, even if

available, when we can obtain more than enough civilian buses to do the job.

- 6b. The PAARRNG is used to support counties on a contingency basis for radiological and all emergencies (see paragraph 1c). We will not entertain inventing such dubious missions for the National Guard just to keep military bases open. Mr. Gary makes suspect his often claimed military expertise if he thinks using Army trucks for the unlikely evacuation of the TMI EPS would influence any congressional action to save military bases in Pennsylvania. There is ample rationale relating to military operations to preserve our installations if Congress is so inclined. I would note here that it is frustrating to receive such blatantly ill conceived schemes for a formal response when this is not part of the Base Realignment and Closure Committee criteria nor would it affect the President's decisions to be forwarded to Congress.
- 7a. At the October 2, 1992, meeting in Senator Shumaker's office (see paragraph 1c), the level of supervision by PEMA of the counties was discussed thoroughly. Similarly, our actions to provide supplies and equipment to the counties during emergencies were explained to Mr. Gary. Further, specific information about emergency supply warehouses in response to a question posed earlier by Mr. Gary was provided to him in a July 15, 1992, letter from the PEMA Chief Counsel (see enclosure). As anyone with intergovernmental relations experience knows, each level of government (state from federal, county from state, etc.) likes to "do their own thing". Counties often do not want the limited oversight provided by state. Should this be the desire of NRC and FEMA, PEMA will comply and provide more oversight.
- 7b. At the same October 2, 1992, meeting, the cycle of plan reviews and updates was explained to Mr. Gary. We explained that plans are living documents, kept loose leaf in three ring binders and changed as the need arises. Further, we explained that a plan is never considered "finished"; because as the planning elements and environment change, the plan is amended to reflect those changes.
- 7c. The reasons for not using military trucks for evacuation are described in detail above.
- 7d. During the October 2, 1992, meeting with Mr. Gary, Senator Shumaker and Commissioner Sheaffer, I explained to Mr. Gary that, in our current situation, there was insufficient justification from the counties to ask the utility rate payers to assume the additional \$5,000,000 Mr. Gary advocated in levied costs through Act 147 to support county radiological emergency response activities. Senator Shumaker forcefully stated that he could not and would not place such a burden on the rate payers when Pennsylvania was in the throes of a serious economic recession. Commissioner Sheaffer agreed. The utilities have stated they are reluctant to provide more stockholder or rate

payer funds to FEMA. FEMA has requested, both through state government channels and from the utilities, more funds to meet the increasing costs of the radiological emergency preparedness program.

- 7g. The answer to this question was provided to Mr. Gary in the FEMA Chief Counsel's letter of July 15, 1992, as follows:

"Federal studies indicate significant radiation exposures from a nuclear power station will be limited to within 10 miles of the facility. For this reason, detailed plans are in place to manage the needed protective action against exposure in that area. In the event people need to be protected in areas beyond 10 miles, these actions will be extended as far as they are needed. The emergency response organization within 10 miles can be extended as conditions warrant. Indeed, Pennsylvania maintains the most conservative evacuation policy for nuclear power plants within the United States. While other "nuclear states" evacuate in sectors, the policy during both the Thornburgh and Casey administrations requires evacuating 360 degrees of the entire approximate 10 mile EPZ."

This answer was elaborated upon in person with Mr. Gary during the October 2, 1992, meeting. It is discouraging to note that the NRC, a major player with EPA in the development of the 10 mile plume exposure pathway emergency planning zone, referred this question to the Commonwealth of Pennsylvania for an answer.

- 7h. This question was also addressed in the October 2, 1992, meeting. It was explained to Mr. Gary that nuclear power plant biennial exercises were scheduled in the late afternoon hours to accommodate the hundreds of volunteers who staff many of the county and municipal EOC staff and emergency response positions. These volunteers are willing to respond to a true emergency at any time, but they cannot afford to leave their regular employment during business hours just for drills. As you know, Pennsylvania is heavily dependent upon volunteers to make the emergency management system work due to funding limitations. Mr. Gary made it clearly known at this meeting that he wanted to impose the same standards for response as those maintained by active military units. Such standards are not feasible for a civilian system that relies to any significant degree on volunteers.
- 8a. Mayor Reed's comments on radiological emergency response planning are always considered, paragraph 1c above explains state and federal policy and plans.
- 8b. See paragraph 1c above.
- 8c. Some spontaneous evacuations during nuclear power plant disasters must be assumed. However, unless FEMA and the NRC are willing to state publicly for the record that the 10-mile EPE is inadequate

and that exceptions must be made for Harrisburg and other similar EPFs near large population centers, the FEMA will continue to follow NRC and FEMA guidance regarding such planning. Harrisburg believes, as commented, that they could handle their population if there was a widespread evacuation. The state concurs.

- 8d. The February 7, 1993, security incident at TMI has been investigated by the NRC and conferences were held in Harrisburg to describe the results of that investigation. FEMA formally reviewed the response by the state and the involved counties and municipalities. It is expected that our review will be released by the Governor's office sometime in July. Copies will be made available to all appropriate government agencies upon request.

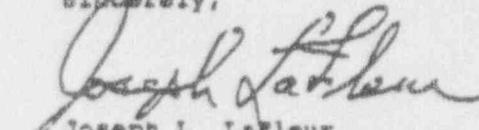
FEMA is also concerned about the February 7 security breach at TMI. We await with interest the results of the NRC consultations on design basis threat for nuclear power plants.

9. Regarding the point of disagreement between Mr. Gary and Mayor Reed. We agree with Mayor Reed. Full-scale bus drills are too costly, significantly rudimentary and unnecessary. Our positions on Mr. Gary's other points are described in detail above.

The plans to support the response to an emergency at TMI have been and are being reviewed on a periodic basis and are evaluated biennially. FEMA is well aware, and has so affirmed in every biennial exercise, that these plans provide reasonable assurance for the protection of the public health and safety. There will always be changes, corrections, revisions and improvements in this ongoing process, but the plans are essentially valid.

Mr. Gary's petition was filed in July 1992. There is in the answers to his questions and the responses to his allegations nothing that can legally or reasonably discredit the validity of the reasonable assurance that is and has been provided over the many years in the planning and exercise validation process. FEMA can affirm this to the NRC and, in turn, to Mr. Gary.

Sincerely,

  
Joseph L. LaFleur  
Director

JLL:JCF:jjk

Enclosure

cc: Commissioner Russell L. Sheaffer  
Dauphin County  
Michael E. Wertz, Coordinator  
Dauphin County EMA  
George Giangli, GPUN



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY  
BOX 3321  
HARRISBURG, PENNSYLVANIA 17105-3321



July 15, 1992

Mr. Robert Gary  
P. O. Box 1637  
Harrisburg, Pennsylvania 17105-1637

Dear Mr. Gary:

This letter responds to the questions/concerns that you raised about radiological emergency response planning in your letters of June 12, 17, and 29, 1992. The answers to those questions/concerns are as follows:

1. Question: Why is all of center city Harrisburg not included in the Emergency Evacuation Zone?

Response: The Emergency Evacuation Zone referred to is technically described as the Plume Exposure Pathway Emergency Planning Zone (EPZ). Federal studies indicate significant radiation exposures from a nuclear power station will be limited to within 10 miles of the facility. For this reason, detailed plans are in place to manage the needed protective action against exposure in that area. In the event people need to be protected in areas beyond 10 miles, these actions will be extended as far as they are needed. The emergency response organization within 10 miles can be extended as conditions warrant. Indeed, Pennsylvania maintains the most conservative evacuation policy for nuclear power plant accidents in the United States. While other "nuclear utility states" evacuate in sectors, the policy during both the Thornburgh and Casey administrations requires evacuating 360 degrees of the entire approximate 10 mile EPZ.

2. Question: Why does PEMA not maintain a file of letters of intent from resource providers?

Response: Letters of intent, mutual aid agreements, etc. are negotiated and maintained by the risk counties where the resources are to be used. Both the Federal Emergency Management Agency and PEMA have recently begun to place more emphasis on such documentation to further refine our plans. This effort will continue, along with a number of other plan refinements well into the next fiscal year.

In this regard, it should be understood that planning for nuclear power plant off site safety, like any other form of emergency operations planning, never ends. Such plans are living documents, maintained in loose leaf binders, and are constantly being refined, added to, or changed; because, situations and conditions in the environment addressed by the plans change. These changes range from simple name and telephone number revisions to new techniques and methods of performing response and recovery

operations that have been gleaned from studies and exercises. In a practical sense, one can say that no plan for anticipated operations is ever complete. Further, planning is time consuming, labor intensive work that requires the cooperative participation of federal, state, county and municipal levels of government. We in FEMA work very hard to maintain continuous and effective communications with the planning jurisdictions in the Commonwealth. This does not mean that at any given time some elements of a plan will not need to be updated.

3. Question: Why have the two regional warehouses cited in Title 35 have not been established?

Response: The short answer is that funds have not been allocated by the legislature for this purpose, even though the requirement is in the law. This is not unusual, particularly for capital expenditures. Large projects inserted into law often fall victim to the prioritization of finite resources. The more thoughtful response is that such expensive facilities are ill advised, since FEMA has stock piles of various emergency supplies at other departmental facilities such as Torrance State Hospital, Pike Center, and other locations.

4. Question: Why not use trains and aircraft to evacuate?

Response: First, as explained above, the evacuation of Harrisburg is not necessary. Secondly, the fastest methods of evacuation in the time available are private automobiles and busses. Evacuation of sizeable populations by train and aircraft is a far more complicated and time consuming operation to plan and execute than using automobiles and busses, to say nothing of the prohibitive costs involved. C-141 aircraft are operated only by the Air Force. They are not, as your letter suggests, also found in the Army, Navy and Marine Corps. These planes, of limited number, are deployed world-wide on a daily basis. To marshal sufficient aircraft to effect an evacuation would take days, not hours, and only after the Declaration of Emergency by the President. The possibility of the Department of Defense participating in such an evacuation mission is highly unlikely. Even then, the use of Capital City Airport would be impossible; because, that Airport, like Harrisburg International, is within the Plume Exposure Pathway EPZ of TMI. Even if sufficient beddown space at Capital City were available, and it is not, facilities for operating C-141s from this airfield (including length of runways) are inadequate. Your suggestion that C-141s could stage out of the Hershey airport (identified as Reigle airport on air navigation charts) won't work. The field is woefully inadequate in all categories including its short runway of 1900 feet. C-141s require runways well in excess of 5000 feet for safe operations. Suffice to say that mass population evacuations by aircraft and trains would far exceed the evacuation time estimates we now have for automobiles and busses.

5. Question: Why are census figures in the plans not updated every year?

Response: In the past, we have used regional population estimates for updating planning figures. The 1990 census showed these estimates to be very inaccurate and actually painted a false picture -- usually predicting steady growth when in fact the populations held constant or declined. More importantly, they did not realistically capture the demographic shifts within the Commonwealth. The 1990 census figures are in hand and are being factored into all of our planning.

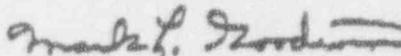
6. Question: How are the fees collected under Sections 7320(c) and (d) of the Emergency Management Services Code (35 Pa. C.S. §7101 et seq.) expended?

Response: All of the fees collected under those two sections are used by PEMA to carry out the many radiological emergency response preparedness and planning functions and duties that are placed upon the Agency by Section 7320(b) of the Code. This includes the payment of salaries and benefits for those PEMA employees who are directly involved in carrying out those radiological emergency response and planning activities.

Thank you for your expressed interest in the above discussed radiological emergency response planning issues.

rac

Sincerely,



Mark L. Goodwin  
Chief Counsel

MS:djs (Tel: 717-783-8150)

cc: Joseph L. LaFleur