

RELATED CORRESPONDENCE

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USNRC

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

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In the Matter of

APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR  
AN OPERATING LICENSE FOR  
COMANCHE PEAK STEAM ELECTRIC  
STATION UNITS #1 AND #2  
(CPSES)

Docket Nos. 50-445  
and 50-446

CASE'S ANSWER TO  
APPLICANTS' MOTION FOR SUMMARY DISPOSITION  
OF INTERVENOR'S CONTENTION 22  
REGARDING EMERGENCY PLANNING

Pursuant to 10 CFR 2.749, CASE (Citizens Association for Sound Energy), Intervenor herein, hereby files this, its Answer to Applicants' Motion for Summary Disposition of Intervenor's Contention 22 Regarding Emergency Planning. As shall be demonstrated herein, there are genuine issues of material fact to be heard regarding this contention. CASE therefore urges that the Board in these proceedings deny Applicants Motion for Summary Disposition and that hearings be held on this Contention.

Attached hereto is a concise Answer to Applicants' Statement of Material Facts Not Genuinely in Issue. As stated in that Answer and detailed in the following, there are indeed many issues which need to be addressed in hearings prior to the granting of an operating license for the Comanche Peak facility.

As set forth with specificity herein, there are many deficiencies in the CPSES Emergency Plan, the Texas State Plan, and the Somervell and Hood Counties Plans which must be dealt with prior to Applicants' being granted an operating license or a low-power test license for CPSES.

Applicants, in their argument on page 4 of their Motion, state:

"The intervenor must be required to oppose this motion and the supporting affidavits with demonstrations by affidavits of competent and qualified affiants that a genuine issue exists as to a material fact. Failing such demonstrations by the intervenor, the Board should 'render the decision sought . . . .' 10 C.F.R. §2.749(d); Order (Granting Summary Disposition of Contentions 2 and 7), supra, 15 NRC at 595. Mere allegations or statements of concern by the intervenor's representative are insufficient to preclude summary disposition."

They have again thus set forth an old bone of contention between Applicants and the Board -- whether or not it is required that an Intervenor have expert witnesses in order to prevent summary disposition. As the Board is well aware, CASE is not represented by an attorney in these proceedings. However, it is our belief that the Board acted correctly when they denied the NRC Staff's Motion for Summary Disposition of Contention 25 (on Financial Qualifications) as well as Applicants' Motion for Summary Disposition of Contention 5 (on QA/QC and construction practices at CPSES). Further, the regulations set forth in 10 CFR 2.749 are not as narrow as Applicants would have one believe; included in the wording of that regulation are the following statements:

"...a party opposing the motion may not rest upon the mere allegations or denials of his answer; his answer by affidavits or as otherwise provided in this section must set forth specific facts showing that there is a genuine issue of fact." (Emphasis added.) -- 2.749(b)

"Should it appear from the affidavits of a party opposing the motion that he cannot, for reasons stated, present by affidavit facts essential to justify his opposition, the presiding officer may refuse the application for summary decision or may order a continuance to permit affidavits to be obtained or make such other order as is appropriate..." (Emphasis added.) -- 2.749(c)

"The presiding officer shall render the decision sought if the filings in the proceeding, depositions, answers to interrogatories, and admissions on file, together with the statements of the parties and the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a decision as a matter of law..." (Emphasis added.) -- 2.749(d)

It should further be pointed out that the instance cited by Applicants whereby Summary Disposition was granted on Contentions 2 and 7 was a far different matter than the one now at issue with Contention 22, in that CFUR (the Intervenor

sponsoring Contentions 2 and 7) was in the process of withdrawing from these proceedings and did not file an answer to the Motion for Summary Disposition regarding Contentions 2 and 7. Applicants would have the Board believe that only if an Intervenor has expert witnesses to testify regarding specific issues should such Intervenor be allowed to participate as a party in these proceedings. This is clearly not supported by any NRC regulation, and there are clear precedents for allowing an Intervenor to make its case by pointing out deficiencies in Applicants' case.

CASE had initially planned to have an expert witness to testify regarding emergency planning, but we were unable to make arrangements for the September hearings due to the particular time frame within which we are working and prior commitments of potential witnesses. However, we believe that there are sufficient deficiencies in Applicants', State, and Counties' Emergency Plans to preclude Applicants' receiving an operating or low-power test license without those deficiencies being cured. Further, we are struck by the similarities between some of the deficiencies in the CPSES plan and those cited in the Zimmer case<sup>1</sup> where it was stated:

"The state of offsite emergency preparedness does not provide reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency." (Conclusions of Law, item (6), Zimmer<sup>1</sup>)

The Board should not allow Applicants to obtain an operating license based on vague, unsupported assurances that everything will magically work out all right should there be an accident at the Comanche Peak plant.

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<sup>1</sup> In the Matter of The Cincinnati Gas & Electric Company, et al. (Wm. H. Zimmer Nuclear Power Station, Unit 1), Docket No. 50-358, June 21, 1982, LBP-82-48, pages 24 through 96. Applicants were required as part of their License Conditions to demonstrate that deficiencies set forth were cured prior to authorizing operation of the Station at power levels in excess of 5% of rated power.

Further, this contention deals with an emergency plan which is supposed to protect the public health and safety in the event of an accident at Comanche Peak. This issue is too important to be decided other than in a public hearing, with the lone remaining Intervenor afforded the opportunity to pursue the deficiencies in the Comanche Peak emergency planning and help assure that the health and safety of the public is protected.

GENERAL:

One of CASE's primary and continuing concerns has been the use of "paper people" -- people who exist only on paper and will not be there physically when they are needed. This is still a primary concern, and there is nothing in the Applicants' current emergency planning (including the State and County Plans) to alleviate this concern. Although obviously it is not necessary to identify each person by name, CASE contends that such individuals should be identified sufficiently to assure that there will indeed be someone available physically and not just on paper.

Another continuing concern is that Applicants have missed one of the basic concepts of the emergency planning as explained in NUREG-0654, Rev. 1, November 1980 (hereinafter referred to as NUREG-0654):

"NRC and FEMA have deliberately consolidated in this document guidance intended for use by State and local governments and that intended to guide the emergency planning and preparedness activities of NRC licensees because of a shared belief that an integrated approach to the development of response plans to radiological hazards is most likely to provide the best protection of the health and safety of the public. NRC and FEMA recognize that plans of licensees, State and local governments should not be developed in a vacuum or in isolation from one another. Should an accident occur, the public can be best protected when the response by all parties is fully integrated. Each party involved must have a clear understanding of what the overall level of preparedness must be and what role it will play in the event of a nuclear accident. This understanding can be achieved best if there is an integrated development and evaluation of plans. There must also be an acceptance by the parties and a clear recognition of the responsibility they share for safeguarding public health and safety." (Emphases added.)

As part of CASE's continuing concern regarding the use of "paper people," there is the aspect of how and by whom the costs associated with proper implementation of all parties involved in emergency planning. NUREG-0654 addresses this (page 25, G. Funding and Technical Assistance):

"While funding and technical assistance are not addressed in this document, it is a subject which must be discussed between the individual nuclear utilities and the involved State and local governments who must prepare emergency plans to support the nuclear facilities. The nuclear utility may have an incentive based on its own self interest as well as its responsibility to provide electric power, to assist in providing manpower, items of equipment, or other resources that the State and local governments may need but are themselves unable to provide. The Federal Regional Assistance Committees, now under the chairmanship of FEMA, will play an increasing role in the development of these plans. Training programs for State and local officials formerly sponsored by NRC and now sponsored by FEMA will continue without interruption."

It is not clear in the Emergency Plans that such discussions regarding funding and technical assistance have taken place between the various parties involved, or that set policies and procedures are in place to assure that such funding and technical assistance will be available on a continuing basis. An additional concern is that, with the recent cuts in budgets and manpower, FEMA will be unable to take as large a role as was previously anticipated. This should be discussed and evaluated in detail in the Emergency Plans.

NUREG-0654 states (Pages 29, J. Form and Content of Plans):

"The plan should make clear what is to be done in an emergency, how it is to be done and by whom."

One of the specific concerns of CASE is in regards to the fact that there is no definitive planning guide specifying Federal response. However, NUREG-0654 states:

"Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan..."

Another major area of concern is that adequate attention has not been given to the fact that there are two major metropolitan centers near the Comanche Peak site. NUREG-0654 states:

"...the range of possible selection for a planning basis is very large, starting with a zero point of requiring no planning at all because significant offsite radiological accident consequences are unlikely to occur, to planning for the worst possible accident, regardless of its extremely low likelihood..."

"EPZs are defined as the areas for which planning is needed to assure that prompt and effective actions can be taken to protect the public in the event of an accident..."

"The choice of the size of the Emergency Planning Zones represents a judgment on the extent of detailed planning which must be performed to assure an adequate response base. In a particular emergency, protective actions might well be restricted to a small part of the planning zones. On the other hand, for the worst possible accidents, protective actions would need to be taken outside the planning zones...Although the radius for the EPZ implies a circular area, the actual shape would depend upon the characteristics of a particular site."

-- Pages 6 and 7, 10, and 11,  
D. Planning Basis

Both Applicants and the NRC Staff have consistently attempted to ignore the Dallas/Fort Worth metroplex area in emergency planning concepts, even though the Staff admitted that the predominant movement of storm cloud formations in the Dallas/Fort Worth area is from the southwest to the northeast:

"CFUR has challenged the wind-rose pattern used by the Applicants to evaluate off-site releases, based on the predominant movement of storm-cloud formations in the Dallas-Fort Worth area. It is correct, as CFUR asserts, that the predominant movement of storm cloud formations in the Dallas-Fort Worth area is from the southwest to the northeast. (Markee, at 6)."

-- NRC Staff's 11/20/81 Answer Supporting Applicants' Motion for Summary Disposition of Contention 9, bottom of page 9 continued on page 10

It would perhaps be helpful at this point to define what is meant by the Dallas/Fort Worth metroplex area. We can well understand that non-Texans might not understand the precise meaning of the term. This is a generally and widely-used term which apparently was first introduced by someone in public relations,

and the phrase caught on and has been absorbed into everyday usage since then.

CASE contacted the North Central Texas Council of Governments, and found that the closest definition to the Dallas/Fort Worth Metroplex area is apparently the Standard Metropolitan Statistical Area (SMSA), which is composed of the following Texas counties: Collin, Dallas, Denton, Ellis, Hood, Johnson, Kaufman, Parker, Rockwall, Tarrant, and Wise. We have not updated this information since our initial contact over a year ago; we would assume that, if anything, the number of people expected to reside in the metroplex area would probably be greater than that which is indicated following. We have attempted to roughly outline this area in relation to the Comanche Peak site (see Attachment L, Page 1 of 2). As can be seen, this area is roughly 6 to 110 miles from the Comanche Peak site. (CASE is not saying that the entire SMSA should be included in emergency planning for Comanche Peak, but that part of the area should be.)

As indicated in CASE Attachment L, Page 2 of 2:

"According to the 1980 Census, the Dallas/Fort Worth SMSA (2,966,342) is the largest metropolitan area in the State. It grew from 1970-80 at an annual rate of 2.3 percent per year with a numerical change of 588,719 persons or 24.8 percent change for the decade. Our (the North Central Texas Council of Government's) estimates show that the SMSA has grown by 91,708 persons or a percent increase of 3.1 percent from April 1, 1980 to January 1, 1981. The cities of Dallas, Fort Worth, Arlington, Garland and Irving all show population in excess of 114,000 persons, while the combined population of Dallas and Fort Worth represents 42.6 percent of the total SMSA population in 1981. The largest numerical increases were in the cities of Fort Worth (14,771), Plano (5,984), Arlington (5,777), Irving (4,891), Garland (4,701), Hurst (4,251), and Carrollton (4,059) which represents 48.5 percent of the total numerical change for the SMSA from 1980-81. Several other cities, including Richardson, North Richland Hills, Denton, Addison, Grapevine, and Bedford, recorded an increase in excess of 2,500 each from 1980-81."

CASE contends that this large metroplex area must be considered in emergency planning to a greater extent than has been so far. Applicants and Staff have attempted to define the Emergency Planning Zones as being some sort of magical 10- and 50-mile radius from Comanche Peak, totally ignoring the fact (as admitted by the Staff) that the predominant movement of storm cloud formations in the

Dallas-Fort Worth area is from the southwest to the northeast. This is especially important during the spring months when thunderstorms occur more frequently.

Another major area which has been ignored in emergency planning is the impact on the Dallas/Fort Worth metroplex area of refugees from the immediate area of the Comanche Peak site in the event of an accident. The rule of reason dictates that it could logically be assumed that in such event there would be a large influx of refugees into the Dallas/Fort Worth metroplex area. There is no indication that this has been considered in the emergency planning. There should be consideration given to, and arrangements made for, sheltering, food, clothing, and medical care for such refugees. This has not been addressed. As far as CASE can tell at this time, there are no plans to even inform anyone in Dallas should there be an accident at Comanche Peak.

There is also no indication in the emergency plans to indicate that sufficient planning has been done in regard to the drinking water sources for the Dallas/Fort Worth metroplex area in the event of an accident at Comanche Peak. This vitally important matter deserves much closer attention than it has been given.

CASE maintains that all segments of the public must be considered who may be affected by accidents at CPSES, including, in the event of a worst-case accident or an accident with large releases of radiation or radioactive materials into the atmosphere, the Dallas/Fort Worth metroplex area if there exists the possibility that the air currents may carry radioactive materials to the metroplex area.

NUREG-0654, Appendix 4, II.D., page 4-4, states:

"Where meteorological conditions such as dominant wind directions, warrant special consideration, an additional sub-area may need to be defined and a separate estimate made for this case."

This has not been done.



NUREG-0654, states on page 9, D.b. Ingestion exposure pathway:

"The principal exposure from this pathway would be from ingestion of contaminated water or foods such as milk, fresh vegetables or aquatic foodstuffs."

Adequate consideration has not been given to the above in regard to the Dallas/Fort Worth metroplex area and the impact of an accident at Comanche Peak in this regard.

Major deficiencies exist in regard to the following: Federal agencies are not identified with sufficient specificity to be meaningful. Additionally, the Department of Agriculture is not identified. The Red Cross is not identified. The following should also be identified: personnel responsible for transmission of emergency information, responsible for food and water supplies, medical support personnel, security personnel, and other support personnel.

Further, it is not sufficient to identify people without indicating that they have been properly trained and are capable of carrying out their functions; there is nothing to assure that the people indicated are going to be properly trained. There is also no documentation that the number of people available will be sufficient to take care of radiological emergencies. There is no indication that arrangements have been made to comfort and care for individuals who may be suffering from psychological problems and stress due to an accident at Comanche Peak.

It should be noted that further guidance is contained in the Federal Emergency Management Agency National Radiological Emergency Preparedness/Response Plan for Commercial Nuclear Power Plant Accidents (the Master Plan), FEDERAL REGISTER, 12/23/80, pages 84910 through 84917. We have not quoted directly from it in this response, but it should be included as an integral part of the Board's consideration of this contention, along with NUREG-0654, Rev. 1, November 1980, and 10 CFR Part 50, Appendix E.

CASE could write a book about specific problem areas detailed in the FEMA Master Plan and NUREG-0654 which have not been adequately addressed in emergency planning for Comanche Peak. There are some portions of nearly every area of emergency planning which has not been sufficiently dealt with in the emergency plans at this time. Many of these areas are not just concerns of CASE. We have included as Attachments A through K hereto comments which were received from the NRC, DOE, the Department of Health & Human Services, U. S. Department of Agriculture, FEMA, EPA, Argonne National Laboratory, and DOT; these comments were provided to CASE by the Texas Department of Health, by Mr. Clarence L. Born, Manager, Emergency Planning Program, Division of Compliance and Inspection, Bureau of Radiation Control, on August 6, 1982 (see his cover letter, Attachment A hereto). We believe that a review of those comments, coupled with CASE's comments herein, will be more than sufficient to persuade the Board that Applicants' Motion for Summary Disposition of CASE's Contention 22 be denied.

CASE is very concerned about one aspect of these proceedings, especially in regard to emergency planning. That is the usual procedure by which Applicants and NRC Staff can only be cross-examined on their pre-filed direct testimony. This means that, in the case of emergency planning where most of the deficiencies are simply that certain aspects have not been addressed at all or adequately, both Applicants and Staff can possibly avoid having to deal with those specific issues by simply ignoring them in their pre-filed direct testimony. CASE cannot believe that this is the purpose of NRC regulations, and we urge the Board to take whatever steps are necessary to assure that a full and complete record is made in these proceedings, not only for the matters included in Applicants' and Staff's pre-filed direct testimony but for those deficiencies which have not been addressed.

CASE'S ANSWERS TO APPLICANTS' STATEMENT OF MATERIAL FACTS NOT GENUINELY IN ISSUE:

1. Statement: The Comanche Peak Steam Electric Station ("CPSES") Emergency Plan identifies all state authorities having responsibility for emergency planning.

Answer: There is nothing to indicate that an integrated approach to emergency planning has been attempted or achieved. See GENERAL comments, pages 4 and 5 especially, preceding.

There is no assurance that the number of people available will be sufficient to take care of radiological emergencies.

There is no indication that arrangements have been made to comfort and care for individuals who may be suffering from psychological problems and stress due to an accident at Comanche Peak.

The Red Cross is not identified; neither are personnel responsible for transmission of emergency information, for food and water supplies, medical support personnel, security personnel, and other support personnel.

There is no assurance that the people indicated are going to be properly trained or that they are fully aware of what their responsibilities will be in the event of an accident at CPSES.

Letter of Agreement with Texas Department of Health does not indicate how they are going to coordinate anything with anybody else; no indication of how it will be accomplished, no procedures, etc.

There is no assurance that the people who supposedly will be performing the functions needed to be accomplished by State people exist except on paper -- resulting in the possible use of "paper people".

Letter of Agreement with Texas Department of Public Safety does not indicate how any of this will be accomplished.

The Public Health Regions functional statement is "to be developed."

It is indicated that all Bureau of Radiation Control personnel will receive training.

It is indicated that individuals will receive initial and annual retraining applicable to their duties.

It is indicated that planners will attend or have attended FEMA planning course.

It is indicated that plans will be distributed.

Fire Protection should be covered by the State, Texas Engineering Extension Service and Forest Service. Only a few capabilities are indicated in local plans.

1. (continued):

Reference is made to backup capability from University of Texas and Texas A&M, but capabilities are not given.

The only discussion of verification by the DPS will be in accordance with SOPs. SOPs not available for review.

Plans for training include State Personnel only; they do not indicate that any integrated planning for training has been done or is anticipated.

Annex C, Texas Department of Agriculture, not received.

Texas State Emergency Management Plan has written agreements between support organizations but does not include the use of USDA resources.

Maps for recording survey and monitoring data, key land use data (e.g., farming), food processing plants, and dairies, should start at the facility and include all of the 50 mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process large amounts of food or agricultural products (originating in the ingestion pathway EPZ, but located elsewhere) should also be maintained.

It is stated that the Texas Engineering Extension Service is responsible for training of fire fighting personnel, but not for training of police and security personnel.

Annex R is referenced in the cross reference for training of personnel responsible for transmission of emergency information; Annex R is not available as part of the plan.

The cross reference refers to documents that are not available as part of the basic radiological emergency response plan and is not responsive to the criteria.

No listing by title of detailed procedures for step-by-step implementation of the plan is included. The sections of the plan to be implemented by each procedure are not identified.

Federal and private sector response organizations which may be needed to work with State and local officials are not included.

Sec. IV.D is cited in the cross reference for resources available to support Federal response. However, this section shows only the duties of the response support group and no mention is made of available resources.

Annex F, Section V.M states that the Radiological Defense Officer will provide assistance as requested to the Texas Department of Health if resources are available. This does not address the requirements of NUREG-0654-H.7 that each organization, where appropriate, shall provide for offsite radiological monitoring

1. (continued):

equipment in the vicinity of the nuclear facility. Same comments for H.10, H.11, and H.12.

It should be clarified whether or not the county will be depended upon to supply radiological data to the state and to the utility for use in assessing the magnitude of the emergency; in any event, it should be clarified as to precisely what duties each response organization will have in this regard.

Sections VIII.B.8 of Appendix 7 to Annex L of the state plan states that the Bureau of Radiation Protection will advise the local officials in decontamination actions, that are to be conducted in accordance with "NCRP Report No. 65." No procedures for the disposal of wastes was found. No procedures were found in the Hood County plan for waste disposal. NCRP Report No. 65 should be made a part of the plan if it is the appropriate procedure to be followed.

Section III.R, Manual of Emergency Procedures, Annex 7 states that "details and criteria for recovery and reentry "will be provided by the Texas Department of Health." However, there is no evidence in the plan that general plans and procedures have been developed.

The cross reference is marked N/A. The state plan, Sections XI.B and XI.D, Annex 7 addresses only state plans and changes. Provisions should be made for forwarding local plans and changes to all responsible emergency response personnel.

With regard to all of the items listed in the preceding, there will be people needed to do all the things which have not been done or which are not yet addressed. The people (specifically) who will be doing those things should be included, along with an assessment of how many people will be available, when they will be available, etc. Where applicable, letters of agreement should also be included with those people.

See also GENERAL comments, pages 4 through 10, preceding, and Attachments A through K attached hereto.

2. Statement: The CPSES Plan identifies all regional authorities responsible for emergency planning.

Answer: It is stated that the County Judge is in charge of the Emergency Organization and directs the operations of the agencies which make up the individual Hood and Somervell County Emergency Organizations. There is no letter of agreement from either of the Judges; there is no indication that these individuals have been either informed of their responsibilities or trained to do them.

2. (continued):

The two letters of agreement from the Sheriff's Departments, which are basically identical in content, state that they will: (1). "Authenticate the notification of an emergency by calling back the agency which made the initial notification." This would seem to be questionable, unless the person calling the Sheriff's Departments will be calling no one else in the meantime. We would assume that they would be busy calling several other individuals and/or organizations. It is also not clear how many people are available on a round-the-clock basis with each Sheriff's Department, how easy it would be to get in touch with the appropriate people at the Department, how quickly the Department could be mobilized, etc. We believe we're dealing with "paper people" again.

The letter of agreement with the Granbury Volunteer Fire Department is being "re-negotiated and will be added to the plan when it becomes available." Therefore, it is non-existent at the present time. It is not sufficient to say that this will be done in the future. There are many unanswered questions, such as "Why was it necessary to renegotiate the letter of agreement to begin with?" "How will the apparent problem which necessitated the renegotiation be solved?" etc.

The Somervell County Fire Department letter of agreement contains the statement, that "The Somervell County dispatcher may verify the authenticity of the request by calling the CPSES Control Room." There is nothing to indicate that they would get anything but a busy signal if they did. There is also nothing to indicate that there are any dedicated telephone lines to assist with vital telephone communications in any regard. The letter also limits the assistance to be given to extinguishing fires at CPSES and on adjacent CPSES property.

The local fire-fighting support consists of approximately 50 volunteers, with one truck, which would be available in approximately 30 minutes. There is no indication of how many volunteers could realistically be expected to show up in case of an actual radiological emergency at CPSES.

There are no specifics about training the fire-fighting support personnel.

There is no mention how the ambulances will coordinate with the hospitals or the plant site, how any emergency on-the-spot treatment will be administered (if any), how the ambulance drivers and attendants will distinguish what is a radiological injury and what protection they will have from radiological contamination. It is not clear how the ambulance attendants will be trained or by whom. They will also call and get a busy signal from the CPSES Control Room.

Who is going to determine who has been exposed to radiation and who hasn't? Hood can only handle 5 injured persons simultaneously

2. (continued):

(not specified to be radiological injuries); no indication is given that Hood County has had any training to treat radiological injuries; it does not say how many personnel, if any, will be trained, and how they will be trained. It states that a physician shall be (in the future?) included on staff (appears to be entirely speculative at this time). There is nothing about capabilities to handle a large-scale accident. It refers to back-up medical services from the Radiation Management Corporation and their affiliated hospital, but there are no provisions indicated for transportation, how much time it will take to get any assistance either on-site or at RMC's facilities at the Northwestern Memorial Hospital in Chicago, Ill. Further, since this change was just made from RMC's Pennsylvania facilities to their Chicago facilities, it is not clear whether or not the Chicago facilities are fully acquainted with what responsibilities they might have in regard to radiological emergencies resulting from an accident at CPSES.

It is stated that TUGCO will provide technical assistance, radiological monitoring equipment and personnel monitoring devices necessary to evaluate the radiological condition of the patient, but there is no indication of specifically who in TUGCO can do this.

There is no letter of agreement with Marks General Hospital.

The letter of agreement with Radiation Management Corporation (RMC) is completely generic. There is nothing specific about CPSES. There are no specifics as to procedures, time elements, identification of any people who will act as liason between CPSES, the county, the State, etc. and/or hospital personnel. No personnel or procedures are identified to determine at which point RMC will be called on if needed; there is no indication that RMC has done any site-specific evaluation of CPSES or surrounding areas or facilities; it is never stated that an expert will come to the site or surrounding areas if needed; there are no provisions about how long it would take such personnel from RMC to get down to the site, what their capabilities are in terms of how many individuals they can take care of, whether or not the patients will be physically able to be transported to Chicago and at whose expense such transportation would occur.

The letter of agreement with Squaw Creek Park, Inc. (SCPI) does not indicate how SCPI will effect the evacuation of Squaw Creek Park, how they will account for all park visitors and personnel; there is not one single person or title named; there is no indication of how many people are available at any given time at SCP; no written procedures have been developed for anything yet; no brochures and emergency information is available yet nor is it clear how the information will be made available and who will pay for it.

Provisions for early distribution of personal dosimetry devices from local sources need to be developed so that local workers

2. (continued):

are covered during the estimated 4-hour deployment time at the beginning of an emergency.

Procedures should be developed for emergency workers to report dosimeter readings frequently. Additional procedures requiring notification when a worker's dose has reached a specified level should be in place. A special set of instructions should be available for a member of the public who must go into an exclusion area. The exposure information should be available before the individual is contaminated.

Provisions for training of local support personnel are not found in the local plans.

Section VII, Part B of the state plan describes the assignment of accident assessment responsibilities. The county should state what equipment, if any, is available to measure whole body gamma exposures and airborne radioiodine concentrations. A plan for transmitting these data, if any, to the EOF should be included.

J.2. Protective Response, of NUREG-0654, is not addressed. The utility is primarily responsible for this, but cooperative arrangements for sheltering, decontamination, medical attention, etc., are needed.

Attachment K to the Hood County plan for Emergency Husbandry Procedures addresses the problem of contamination of human and animal foods in an adequate manner for the most part. Gamma ray and radioiodine exposures directly from the airborne plume are not adequately addressed, however. The response indicated in the procedures for the Executive Group is one of ordering evacuation or sheltering when recommended by the state or by the utility. If this is the case, the cross-reference for J.9 should include a reference to Section I - The Executive Group Procedures.

Hood County Annex F, Section V M states that exposure control is the function of the Texas Department of Health but that the county RDO will assist as requested if resources are available. Attachment G - Evacuation - Tab. 3 lists the contents of the list for roadblock personnel. Only a TLD is to be furnished. NUREG 0654-K3 requires both self-reading (e.g., pocket ion dosimeter) and permanent record dosimeters (e.g., TLD). In addition, the self-reading devices must have appropriate sensitivities to permit meeting NUREG00654, K4. Each emergency worker should be provided a sensitive direct-reading dosimeter (e.g., 0-200 m Rem) plus a higher range direct-reading dosimeter (e.g., 0-20 Rem) plus a permanent record device (e.g., TLD or film badge). Improvements are needed in the plan to insure the availability and proper distributions of appropriate dosimeters. Section VII-B-7 of Appendix 7 to Annex L of the state plan (contamination control) implies that all workers entering a contaminated area will have dosimeters but the number available, the source



2. (continued):

of supply, etc., is not detailed.

Dose record forms need to be included in the plan and need to be distributed to emergency workers. In addition, requirements need to be developed for frequent reading and timely reporting of doses to the EOCs by the emergency workers.

The procedure for authorization of emergency workers to incur exposures in excess of PAGs needs to be clearly stated in the county plan. This should clearly name the official who is able to authorize this action. The procedure should also clearly require that the decision take into account the exposure data from the preceding three paragraphs.

Attachment H - Shelter; Monitoring and Precontamination Procedures of the Hood County plan does not specify action levels for decontamination. The Tab 1, Chapter 1, Procedure 5, Part VI does specify action levels for initiating decontamination.

Supporting plans and their sources are not listed for the local plans. The listing of supporting plans found in Tab. 1, Introduction Sections III and IV, Annex 7, state plan pertains only to supporting plans for the state.

The cross reference indicates that provisions for updating telephone numbers are in the utility emergency response plan. They should also be included in the local plans.

(NOTE: Most of the preceding applies to both Hood County and Somervell County; the referenced sections in the two county plans may vary somewhat, but the basic information is the same.)

Annex C - Shelter Plan - is not included.

Annex D - Radiological defense plan - is not included.

Annex E - Crisis Relocation Plan - is not included.

Cross Reference for C.1.a. indicates N/A. Base plan VI, A.1.d. and VIII, indicates County Judges or Mayors may request State, Federal or military assistance through State Disaster Districts. Can local government request Federal or military assistance directly? If so, it should be indicated and the proper procedures for doing so should be detailed.

Cross reference for C.2.a. indicates this element N/A. Plan should designate local official to serve as representative of local government at the EOF (may be there if he/she so chooses).

Local government relies heavily upon State assistance for technical capabilities. Local resources other than schools and local government not addressed. Letters of agreement with school

2. (continued):

districts may be appropriate unless school resources have been specifically committed previously through legal instruments, in which case such instruments should be included.

We are unable to find maps of evacuation areas as such. There is a general lack of precise evacuation procedures in the plans. Will instructions and procedures including areas to be evacuated be included in the public information packages? We are unable to find maps of shelter or relocation areas.

Shelter facilities should be outside the 10 mile EPZ (Glen Rose Senior High, which is within the 10-mile zone, is listed as a shelter facility).

Where does the temporary clothing come from if an individual's clothing is contaminated? This should be addressed specifically.

Local plans should indicate they will participate in appropriate training. If mutual aid pacts or reciprocal agreements exist between government entities, like training will be made available to them. Those organizations listed should indicate their intent to participate in the necessary training to qualify them for response to an accident/incident at CPSES.

The Plan doesn't say that the Emergency Management Director/Coordinator will receive any training.

The Plan is to be reviewed each six months and revised or updated annually. While not mentioned specifically, mentions it is assumed this review and update process would consider any comments made as a result of exercises. This should be specifically addressed and it should be indicated who specifically will do such reviewing and updating based on comments received and that such comments will be incorporated into the plan and adopted if appropriate.

See also those items under Answer 1 preceding which also apply to regional authorities as well as State authorities. We have not repeated them here.

With regard to all of the items listed in the preceding, there will be people needed to do all the things which have not been done or which are not yet addressed. The people (specifically) who will be doing those things should be included, along with an assessment of how many people will be available, when they will be available, etc. Where applicable, letters of agreement should also be included with those people.

See also GENERAL comments, pages 4 through 10, preceding, and Attachments A through K attached hereto.

3. Statement: Texas Utilities Generating Company ("TUGCO") has obtained Letters of Agreement from Hood General Hospital, Hood County Sheriff, Hood General Ambulance Service, Somervell County Sheriff, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, Radiation Management Corporation, Texas Department of Health, Texas Department of Public Safety, U. S. Department of Energy, and Squaw Creek Park, Inc. regarding warning and evacuation of the public and conduct of operations in the event of an emergency at CPSES.

Answer: See Answer 2 preceding: Page 14, paragraph 1; paragraph 2; paragraph 3, 4 and 5; paragraphs 6 and 7; Page 15, 3rd full paragraph; 4th paragraph; for comments regarding Hood County and Somervell County Sheriff's letters of agreement, Granbury Volunteer Fire Department letter of agreement, Somervell County Fire Department letter of agreement, Radiation Management Corporation letter of agreement, and Squaw Creek Park, Inc. letter of agreement. Also, see Answer 1 preceding: Page 11, paragraph 6; page 11, paragraph 8; page 11, paragraph 10; for comments regarding Texas Department of Health letter of agreement, Texas Department of Public Safety letter of agreement, Bureau of Radiation Control. Also Answer 2, page 14, bottom paragraph continued on top of page 15, regarding Hood General Hospital letter of agreement.

See also other portions of Answers 1 and 2 preceding which are also applicable in many cases to this answer. We have not repeated them here.

With regard to all of the items listed by Applicants in their statement of item 3, it is not clear that the individuals and organizations involved have been made fully aware of the information contained in NUREG-0654 and other applicable regulatory documents, that they are willing to participate in proper training, that they know exactly what their responsibilities will be and that they are capable and willing to perform those responsibilities and duties; there needs to be further clarification of specifically who will be doing each thing, an assessment of how many people will be available at specified times, when and how often they will be available, etc. This should be clarified in each letter of agreement.

See also GENERAL comments, pages 4 through 10, preceding, and Attachments A through K attached hereto.

4. Statement: Letters of Agreement obtained by TUGCO identify the principal officials responsible for warning and evacuation by title and agency.

Answer: See Answer 3 preceding, especially the third, fourth, and fifth paragraphs.

5. Statement: A Letter of Agreement with the Granbury Volunteer Fire Department is being renegotiated and will be included in the CPSES Emergency Plan when available.

5. (continued):

Answer:

It is not sufficient to state that the above-referenced Letter of Agreement "is being renegotiated and will be included" at some nebulous later date. It should be ascertained why the letter had to be renegotiated to begin with, what the problem was to begin with and whether or not sufficient detailed information is or will be available to assure that regulatory requirements will be met in this regard. \*

Further, if and when this Letter of Agreement is executed, it should be stated clearly that the individuals and organizations involved have been made fully aware of the information contained in NUREG-0654 and other applicable regulatory documents, that they are willing to participate in proper training, that they know exactly what their responsibilities will be and that they are capable and willing to perform those responsibilities and duties. There should also be spelled out with some specificity who will be doing each thing, an assessment of how many people will be available at specified times, when and how often they will be available, etc.

This Letter is non-existent at the present time.

6. Statement: Sections 1.3.1.3., 1.3.1.4., and 10.0 of the CPSES Emergency Plan describe arrangements for medical support, including the services of physicians qualified to handle radiation emergencies and arrangements for transportation of injured or contaminated individuals beyond the site boundary. These arrangements are further described in the Letters of Agreement between TUGCO and Hood General Hospital, Hood General Ambulance Service, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, and Radiation Management Corporation.

Answer: See Answer 3 preceding. See also Answer 1: page 11, paragraphs 1, 2, 3, 4, 5, 7, 11, 12, 13; page 12, paragraphs 1, 3, 8, 11, 13; page 13, paragraphs 1, 2, 3, 4.

7. Statement: The CPSES Emergency Plan adequately describes plans for testing of emergency plans by annual exercises and periodic drills.

Answer: Reference to the NRC rules are not included in the State plan (as set forth in NUREG-0654, page 71, N. Exercises and Drills, 1.a.).

Provision for medical emergency drills could not be located in the local plans.

The State plan does not provide for radiological monitoring drills.

Scenario development should include the information contained in NUREG-0654, pages 73 and 74, N.3.a, b, c, e, and f.

Although references to Federal response are made in several locations throughout the plan, there is no definitive planning

7. (continued):

guide specifying Federal response. NUREG-0654 directs that planning for Federal response be included even though there is no intention on the part of the State to include such resources in the emergency response resource requirements.

There is no reference to unannounced exercises, although it is indicated that such exercises will be in accordance with FEMA requirements. The plan does not specifically address exercise objectives and evaluation. It is asserted that drills over and above those conducted during annual exercises are not necessary, since the staff perform such activities routinely. This may be true at present, but the situation could change in the future. It should be specified that additional drills would be carried out if exercise debriefing or critiques should indicate this need. Additional drills may also be appropriate as staff assignments are changed, new equipment is acquired, or new procedures are instituted.

The State plan identifies only the American Red Cross as private sector response organizations, although universities and laboratories are given response assignments.

No mention is made of provisions for starting exercises between 6:00 p.m. and midnight and between midnight and 6:00 a.m.

The dates, times, places for exercises and drills are not mentioned in the State plan.

No time schedule of events is included in the plans.

No exercises or drills including such things as simulated casualties, off site fire department assistance, rescue of personnel, etc. are mentioned.

A description of the arrangements for and advance materials to be provided for official observers is not included in the sections covering Exercises and Drills.

(NOTE: Most of the preceding items which apply to Somervell County also apply to Hood County.)

The cross reference cites the utility emergency plan, but the state plan makes some of the exercises and drills the responsibility of the utility, the Bureau of Emergency Management, and the Bureau of Radiation Control. There is no evidence in the local plan that local organizations receive training or participate in exercises and drills or that training programs for local emergency response personnel have been developed. These comments apply to each item in NUREG Section N. Exercises and Drills, Planning Standard, pages 71 through 74.

7. (continued):

The cross reference cites the Manual of Emergency Procedures, Sec. IV, Part IV, A, pages 118 and 119 as providing information for transients. However, the information contained therein is specifically for residents. These sections should also contain detailed information for transients.

See also those items under Answers 1 and 2 preceding which also apply in part to this item. We have not repeated them here.

With regard to all of the items listed in the preceding, there should be an identification (specifically) of the people who will be doing those things which need to be done, along with an assessment of how many people will be available, when they will be available, etc. Where applicable, letters of agreement should also be included for those people.

See also GENERAL comments, pages 4 through 10, preceding, and Attachment A through K attached hereto.

8. Statement: The CPSES Emergency Plan provides for participation of state and local emergency authorities in emergency drills and exercises. Participation of state and local authorities is described in Letters of Agreement with the responsible agencies.

Answer: See Answer 7 preceding.

9. Statement: Arrangements for medical support include the immediate vicinity of the site and the City of Glen Rose.

Answer: See Answer 1 preceding: page 11, paragraphs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13; page 12, paragraphs 1, 3, 6, 8, 9, 10, 11, 12; page 13, paragraphs 1, 2, 4, 5 and 6.

10. Statement: The City of Glen Rose-Somervell County Emergency Operations Plan, Fixed Nuclear Facility Response Plan, and Manual of Procedure for incidents Involving the Comanche Peak Steam Electric Station provide for emergency planning in the City of Glen Rose.

Answer: See Answer 9 preceding.

11. Statement: The Dallas/Fort Worth Metroplex lies outside the ten-mile plume exposure pathway emergency planning zone ("EPZ").

Answer: This statement is incorrect. Some portions of the Dallas/Fort Worth Metroplex lie outside the ten-mile exposure pathway emergency planning zone ("EPZ"). However, some portions lie within the EPZ as identified in NUREG-0654, Rev. 1. Further, Applicants' and Staff's interpretation of what is meant by the EPZs is not consistent with what is stated in the regulations (see

11. (continued):

GENERAL, pages 6 through 9 for specific details); their interpretation ignores key factors which should be considered in determining the size and shape of the EPZs.

12. Statement: Much of Tarrant County and a small portion of Dallas County lie within the fifty-mile Ingestion Exposure Pathway EPZ.

Answer: This statement is true in part: Much of Tarrant County does lie within the fifty-mile Ingestion Exposure Pathway EPZ. The remaining portion of the statement, however (that "a small portion of Dallas County" lies within the fifty-mile ingestion Exposure Pathway EPZ), is too broad and lacks specificity to the point of being meaningless.

See also Answer to 11. preceding.

13. Statement: The State is responsible for emergency planning in the Ingestion Exposure Pathway EPZ.

Answer: This statement verifies and confirms that Applicants have missed one of the major points set forth in NUREG-0654 -- that there should be an integrated approach to the development of response plans to radiological hazards. See GENERAL, pages 4 and 5 in particular, and 6 through 10 generally; and Answers 1, 2, and 7.

14. Statement: The Texas Emergency Management Plan provides for emergency planning in the Ingestion Exposure Pathway EPZ.

Answer: The question is not whether or not there are words printed on paper about the Texas Emergency Management Plan providing for emergency planning in the Ingestion Exposure Pathway EPZ, but rather whether or not such planning is adequate and provides assurance that all regulatory requirements will be met in this regard. CASE does not believe that such assurance exists at this time.

Further, as stated previously, Applicants' and Staff's interpretation of what is meant by the EPZs is not consistent with what is stated in the regulations (see GENERAL, pages 6 through 9 for specific details); their interpretation ignores key factors which should be considered in determining the size and shape of the EPZs.

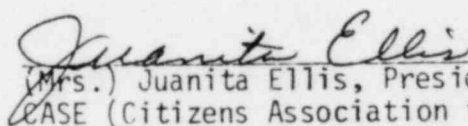
See also Answers 1, 2, 7, 9, 11, 12, and 13 preceding.

We note that Applicants have set forth these Statements in Applicants' Statement of Material Facts Not Genuinely in Issue in a different manner from that set forth in Applicants' Motion for Summary Disposition of Intervenor's Contention 22 Regarding Emergency Planning. In the latter, Applicants have

addressed CASE's Contention 22 as it was worded when finally approved by the Board. We have addressed these matters as Applicants presented them in Applicants' Statement; however, we believe that sufficient information is contained herein to cover each of the sub-parts of our contention as it was worded when accepted.

For the reasons set forth herein, CASE urges that the Board deny Applicants' Motion for Summary Disposition of Intervenor's Contention 22 Regarding Emergency Planning, filed August 23, 1982. Further, we request that the Board take whatever steps are necessary to assure that a full and complete record is made in these proceedings, not only for the matters included in Applicants' and Staff's pre-filed direct testimony but for those deficiencies which have not been addressed. (See page 10, last paragraph, for further details.)

Respectfully submitted,

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)  
1426 S. Polk  
Dallas, Texas 75224  
214/946-9446



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

8/30/82

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of

APPLICATION OF TEXAS UTILITIES  
GENERATING COMPANY, ET AL. FOR  
AN OPERATING LICENSE FOR  
COMANCHE PEAK STEAM ELECTRIC  
STATION UNITS #1 AND #2  
(CPSES)

Docket Nos. 50-445  
and 50-446

CASE'S ANSWER TO  
APPLICANTS' STATEMENT OF MATERIAL  
FACTS NOT GENUINELY IN ISSUE

1. Statement: The Comanche Peak Steam Electric Station ("CPSES") Emergency Plan identifies all state authorities having responsibility for emergency planning.

Answer: Applicants' Emergency Plan does not adequately identify all state authorities having responsibility for emergency planning. See CASE's Answer to Applicants' Motion for Summary Disposition of Intervenor's Contention 22 Regarding Emergency Planning (hereinafter referred to as CASE's Answer), pages 11 through 13.

2. Statement: The CPSES Plan identifies all regional authorities responsible for emergency planning.

Answer: The CPSES Plan does not adequately identify all regional authorities responsible for emergency planning.  
See CASE's Answer, pages 13 through 18.

3. Statement: Texas Utilities Generating Company ("TUGCO") has obtained Letters of Agreement from Hood General Hospital, Hood County Sheriff, Hood General Ambulance Service, Somervell County Sheriff, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, Radiation Management Corporation, Texas Department of Health, Texas Department of Public Safety, U. S. Department of Energy, and Squaw Creek Park, Inc. regarding warning and evacuation of the public and conduct of operations in the event of an emergency at CPSES.

Answer: There is not enough detailed information as to specific responsibilities of the above-referenced and other individuals and agencies regarding warning and evacuation of the public and conduct of operations in the event of an emergency at CPSES to satisfy regulatory requirements in this regard.

See CASE's Answer, page 19.

4. Statement: Letters of Agreement obtained by TUGCO identify the principal officials responsible for warning and evacuation by title and agency.

Answer: There is not enough detailed information contained in the Letters of Agreement obtained by TUGCO in this regard to satisfy regulatory requirements.

See CASE's Answer, page 19.

5. Statement: A Letter of Agreement with the Granbury Volunteer Fire Department is being renegotiated and will be included in the CPSES Emergency Plan when available.

Answer: It is not sufficient to state that the above-referenced Letter of Agreement "is being renegotiated and will be included" at some nebulous later date. It should be ascertained why the letter had to be renegotiated to begin with, what the problem was to begin with and whether or not sufficient detailed information is or will be available to assure that regulatory requirements will be met in this regard.

See CASE's Answer, pages 19 and 20.

6. Statement: Sections 1.3.1.3, 1.3.1.4, and 10.0 of the CPSES Emergency Plan describe arrangements for medical support, including the services of physicians qualified to handle radiation emergencies and arrangements for transportation of injured or contaminated individuals beyond the site boundary. These arrangements are further described in the Letters of Agreement between TUGCO and Hood General Hospital, Hood General Ambulance Service, Glen Rose-Somervell County Volunteer Fire Department and Rescue-Ambulance Service, and Radiation Management Corporation.

Answer: There is not enough detailed information as to specific responsibilities of the above-referenced individuals and others who may be needed as medical support in the event of an accident at CPSES to assure that regulatory requirements will be met in this regard.

See CASE's Answer, page 20.

7. Statement: The CPSES Emergency Plan adequately describes plans for testing of emergency plans by annual exercises and periodic drills.

Answer: There is not enough detailed information to assure that regulatory requirements will be met in this regard.

See CASE's Answers, pages 20 through 22.

8. Statement: The CPSES Emergency Plan provides for participation of state and local emergency authorities in emergency drills and exercises. Participation of state and local authorities is described in Letters of Agreement with the responsible agencies.

Answer: There is not enough detailed information to assure that regulatory requirements will be met in this regard.

See CASE's Answers, page 22.

9. Statement: Arrangements for medical support include the immediate vicinity of the site and the City of Glen Rose.

Answer: There is not enough detailed information to assure that regulatory requirements will be met in this regard.

See CASE's Answers, page 22.

10. Statement: The City of Glen Rose-Somervell County Emergency Operations Plan, Fixed Nuclear Facility Response Plan, and Manual of Procedure for Incidents Involving the Comanche Peak Steam Electric Station provide for emergency planning in the City of Glen Rose.

Answer: See Answer 9 above.

11. Statement: The Dallas/Fort Worth Metroplex lies outside the ten-mile plume exposure pathway emergency planning zone ("EPZ").

Answer: This statement is incorrect. Some portions of the Dallas/Fort Worth Metroplex lie outside the ten-mile exposure pathway emergency planning zone ("EPZ"). However, some portions lie within the EPZ as identified in NUREG-0654, Rev. 1.

See CASE's Answers, pages 22 and 23.

12. Statement: Much of Tarrant County and a small portion of Dallas County lie within the fifty-mile Ingestion Exposure Pathway EPZ.

Answer: This statement is true in part: much of Tarrant County does lie within the fifty-mile Ingestion Exposure Pathway EPZ. The remaining portion of the statement, however (that "a small portion of Dallas County" lies within the fifty-mile Ingestion Exposure Pathway EPZ), is too broad and lacks specificity to the point of being meaningless.

See CASE's Answers, page 23.

13. Statement: The State is responsible for emergency planning in the Ingestion Exposure Pathway EPZ.

Answer: This statement verifies and confirms that Applicants have missed one of the major points set forth in NUREG-0654 -- that there should be an integrated approach to the development of response plans to radiological hazards.

See CASE's Answers, page 23.

14. Statement: The Texas Emergency Management Plan provides for emergency planning in the Ingestion Exposure Pathway EPZ.

Answer: The question is not whether or not there are words printed on paper about the Texas Emergency Management Plan providing for emergency planning in the Ingestion Exposure Pathway EPZ, but rather whether or not such planning is adequate and provides assurance that all regulatory requirements will be met in this regard. CASE does not believe that such assurance exists at this time.

See CASE's Answers, page 23.



# Texas Department of Health

Robert Bernstein, M.D., F.A.C.P.  
Commissioner

1100 West 49th Street  
Austin, Texas 78756  
(512) 458-7111

Robert A. MacLean, M.D.  
Deputy Commissioner  
Professional Services  
  
Hermas L. Miller  
Deputy Commissioner  
Management and Administration

August 6, 1982

*Mrs.*  
Mrs. Juanita Ellis, President  
Citizens Association for Sound Energy (C.A.S.E.)  
1426 South Polk Street  
Dallas, Texas 75224

Dear Mrs. Ellis:

In response to your telephone request today, enclosed please find the following documents:

- Item: Texas State Emergency Management Plan of 1982
- Item: Texas Department of Health's Annex L to the State Plan
- Item: The Bureau of Radiation Control's Appendix 7 to Annex L  
(Including Tab 1; Fixed Nuclear Facility Response)
- Item: Local Emergency Management Plans for Hood and Somervell Counties
- Item: Cross Reference of the above cited documents to NUREG-0654, Rev. 1
- Item: Copies of the comments of each reviewing agency on the Regional Assistance Committee concerning the contents of the above documents

Please be aware that the local plans for Hood and Somervell Counties are the responsibility of the County Judges of the respective counties, and are not a part of the Texas State Emergency Management Plan. Questions concerning those local plans should be directed to the appropriate local official.

Additionally, please be aware that the first four items listed above are only a part of the Texas State Emergency Management Plan. As was stated in the letter of transmittal to FEMA, and explained in person to members of the RAC (Regional Assistance Committee) on June 17th, "Other annexes to the State Plan, along with supporting documentation are on file in the offices of the Division of Emergency Management, and are available for inspection upon request." Because those other annexes constitute a large volume of material, and because they contain information not directly germane to radiological emergency response, they were not submitted for review, but are available for your inspection in the offices of the respective State Agencies.

Sincerely,

Clarence L. Born, Manager  
Emergency Planning Program  
Division of Compliance and Inspection  
Bureau of Radiation Control



UNITED STATES  
NUCLEAR REGULATORY COMMISSION

REGION IV  
611 RYAN PLAZA DRIVE, SUITE 1000  
ARLINGTON, TEXAS 76011

Attachment B-1

July 29, 1982

*Level*  
*7-20-82*  
*SB* *John*

Al Lookabaugh, Chairman  
Regional Assistance Committee  
Federal Emergency Management Agency  
Region VI  
Federal Center  
Denton, Texas 76201

Dear Mr. Lookabaugh:

The following are my comments on the Texas Emergency Management Plan which was submitted to our office for review on June 17, 1982.

Each of the planning element criteria from NUREG-0654 that are assigned to the NRC are listed below followed by the appropriate comment.

Element C.1.a

The Governor is authorized to request federal assistance using his disaster declaration authority. The Disaster Response Program Director is designated to coordinate specific requests to the various federal agencies having radiological emergency response capability.

Element C.2.a

Provisions are made to dispatch a representative to the licensee's EOF.

Element C.3

Radiological laboratories are adequately described, however, I could not locate information describing the expected availability during an emergency.

Element D.3

The emergency classification and action level scheme is consistent with that established by the facility licensee.

Element E.1

Notification and verification procedures are established and are consistent with the emergency classification and action level scheme.

## Element E.2

Alerting and notifying personnel is adequately described but procedures for actually mobilizing emergency personnel are not. Procedures for assembling and briefing field teams at the Bureau Office (or elsewhere) should be described.

In the Accident Notification Sequence (Attachment 6 to Appendix 7, page 29), it appears that considerable time could elapse before the Bureau of Radiation Control is notified (i.e., it appears that 5 agencies are notified before the Bureau). However, it is noted that arrows on the sequence show an "alternate channel of notification". What does this mean? Is the notification of BRC timely?

## Element E.6

The local government is responsible for notifying and providing the prompt instructions. Procedures for this are adequately described in the local plans.

## Element F.1.d

Communication procedures are adequately described in the Hood County plan for local officials. However, a description of State communication procedures could not be located. There should also be a description of communication procedures for the field monitoring teams.

## Element G.3.a

Points of contact and physical locations have been designated in both State and local plans.

## Element G.4.a

The local plan designates specific spokespersons by title, but the State plan refers only to "bureau personnel assigned this function." Who are the persons (titles) assigned to coordinate public and news media information?

## Element H.3

Emergency operation centers are described in state and county plans.

## Element H.4

Timely activation and staffing of EOC's is provided for in the plans.

## Element H.7

Offsite radiological monitoring equipment is briefly described but no listing or specific description is given. A list of all monitoring equipment giving make and model number, radiation detected, range and other descriptive information should be included (i.e., such lists are given for backup labs like the UT TRIGA facility).

## Element H.10

The State plan calls for semi-annual calibration of instruments. Instrument reserve capability cannot be determined without an inventory list.

## Element H.11

Emergency kits are adequately described.

## Element H.12

A central collection and analysis point for radiological samples is established by the plan.

## Element I.7

Field monitoring in the plume exposure pathway is adequately described.

## Element I.8

The plan only partially addresses this element. The USEPA "Manual of Protective Action Guides and Protective Actions for Nuclear Accidents" is referenced, but the plan contains no specific information regarding procedures to be used by the Bureau of Radiation Control. For example, there should be information on computer, or calculator programs (if used), isopleths, recording data supplied by the licensee, use of meteorological data, and any deviations from EPA procedures that may be used. Also, no information is provided regarding team communications or estimated deployment times.

## Element I.9

Specific information concerning radioiodine monitoring could not be located in the plan.

## Element I.10

According to the State plan, dose estimates for the key isotopes can be made based on actual and projected dose rates and EPA protective action guides would be used.



## Element J.10.m

The basis for the choice of recommended protective actions are given.

## Element K.3.a

Twenty-four hour capability is provided for. Dosimeter distribution is provided for.

## Element K.3.b

The reading of dosimeters is included in the plan and dose records will be kept according to written procedures in the plan.

## Element K.5.a

Decontamination action levels are specified.

## Element K.5.b

Decontamination procedures are thoroughly described in the State plan.

## Element L.1

The local plans describe the general capabilities of the county hospitals. However, a list of supporting hospitals was being developed and was not yet included in plans.

## Element L.3

The hospital list is under development.

## Element L.4

Procedures for medical transportation to medical support facilities could not be located in the plan.

## Element N.1.a

Exercises are provided for and will be conducted ". . . in accordance with requirements identified by the Federal Emergency Management Agency." (Tab 1: FNF Response, Introduction, Attachment 4-4). Reference to the "NRC rules" mentioned in Element N.1.a are not included in the State plan.

## Element N.1.a

Communication drills are adequately provided for.

## Element N.2.c

Provision for medical emergency drills could not be located in the local plans.

## Element N.2.d

The State plan does not provide for radiological monitoring drills. The plan states that Bureau personnel routinely perform radiological monitoring and therefore do not need an annual drill.

The value of such a drill is to provide monitoring teams the opportunity to practice in the environment surrounding the nuclear facility. For this reason, an annual drill is recommended.

## Element N.2.e(1)

Health physics drills are adequately provided for in the State plan.

## Elements N.3.a, b, c, e, and f

Scenario development is to include the information contained in these elements.

## Element N.4

Exercise critiques are provided for in the State plan.

## Element N.5

Evaluation of observer comments and management control over plan revision and corrective comments is provided for.

## Elements O.4.a, b, c, d, and f

Training programs are described in the State and local plans.

## Element P.4

Plan updating is provided for.

## Element P.6

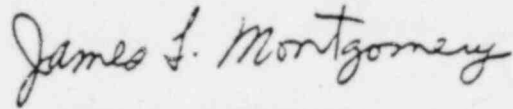
The plans contain a detailed listing of supporting plans and their source.

## Element P.7

Implementing procedures are included.

This concludes my comments on the Texas Emergency Management Plan. If you have questions or need additional information, please contact this office.

Sincerely,

A handwritten signature in cursive script that reads "James L. Montgomery".

James L. Montgomery  
Regional State Liaison Officer



Department of Energy  
Albuquerque Operations Office  
P.O. Box 5400  
Albuquerque, New Mexico 87115

Attachment C

*all*  
*luc* *john*  
JUL 22 1982

July 20, 1982

Al Lookabaugh, Chairman,  
FEMA VI Regional Assistance Committee  
Federal Emergency Management Agency,  
Region VI  
Federal Center  
Denton, TX 76201

Dear Mr. Lookabaugh:

As requested by your letter of June 18, 1982, subject, Review of State and Local Plans for Comanche Peak, we have reviewed the subject documents.

In general we find the plans adequately meet the criteria established by NUREG-0654, FEMA-REP-1, Rev. 1. The plans are complete and in depth, both for State and Local agencies.

However, one general comment is offered for consideration by the State. Although references to Federal response are made in several locations throughout the plan, there is no definitive planning guide specifying Federal response. NUREG-0654 directs that planning for Federal response be included even though there is no intention on the part of the State to include such resources in the emergency response resource requirements. In the event of an incident at any fixed nuclear facility in the State which affects the offsite area, Federal response will be in evidence without planning. We believe planning should be included to cover such an exigency.

Sincerely,

*Raymond L Miller*  
Jack R. Roeder  
Director  
Operational Safety Division

# MEMORANDUM

Attachment D-1  
DEPARTMENT OF HEALTH & HUMAN SERVICES  
PUBLIC HEALTH SERVICE  
FOOD AND DRUG ADMINISTRATION

TO : Al Lookabaugh, Chairman  
Regional Assistance Committee  
FEMA, Region VI, Federal Center  
Denton, Texas 76201

DATE: July 16, 1982

FROM : Litsey L. Zellner, RRHR  
Region VI

*F. J.*

*Lead*  
*JL 19 1982*

SUBJECT: Review of the Texas Emergency Management Plan, Annex L,  
Appendix 7, Hood and Somervell Counties

*Green*  
*Al Lookabaugh*  
*7/16/82*

Comments on the above subject plan are attached.

Enclosure  
a/c

- A.2.a. This section is covered in Annex L, Pages 5-14 and Appendix 7, Pages 7-17 and State Plan. Fire Protection should be covered by the State, Texas Engineering Extension Service and Forest Service. Only a few capabilities in local plan.
- A.2.b. This section is covered in State Plan, Page 2, Annex L, Page 1, Appendix 7, Page 1, and local plans - Page 1.
- C.2.a. This capability discussed in Tab 1, Ch. 1, Section V.C 1 and 6 (Pages 6 and 8).
- C.3. In Tab 1, Ch. 1, Section V.c.5 (Page 7) describes the Bureau of Radiation Control's Mobile Lab capability. Tab 1, Section VII I, Page 8, refers to backup capability from University of Texas and Texas A&M, but does not give capabilities.
- C.4. The first outside assistance will be requested from the Southern Mutual Radiation Assistance Plan and then from the Federal Government.
- D.j. Emergency classification for State in Tab 1, Ch. 1, Section III, Page 3, locals on Pages 48-50 and 49-51.
- E.1. The only discussion of verification, Tab 1, Page 19, by the D.P.S. will be in accordance with SOPs. SOPs not available for review. Local plans provide for verification on Pages 147, 148, 158, and 159.
- E.2. Procedures for alerting emergency personnel are addressed in the State Plan, Annex L, Appendix 7, Hood County and Somervell County.
- E.7. This is included in local plans only on Pages 156-158, 227-231 and 167-168, 237-239.
- G.1. This section is included in local plans only, Pages 117-118, 128 and 129.
- H.12. A sample coordination team of two individuals will be located at near-site, Emergency Operations Facility, Tab 1, Ch. 1, Pages 7-8.
- I.10. This is established in Tab 1, Ch. 1, Procedure 1.
- J.9. The state and Counties have capabilities for implementing protective measures. The Department of Agriculture Plan and Department of Healths, Appendices 2 and 9 to Annex L were not available for review.
- J.10.e. K.I. use will be recommended for emergency workers and institutionalized persons. The quantity of K.I. and the distribution are not provided for in the plans.
- J.10.f. K.I. will not be administered to the general population and the predetermined use for workers are identified in the FAGs.

- J.10.m. The basis for the choice of recommended protective actions are in the States', Tab 1, Ch., 1, Procedure 1. There was no reference to the protection afforded by the shelters for direct and inhalation exposures and no evacuation time estimates.
- J.11. Procedures for detecting contamination, estimating dose commitment and protection procedures are in Procedure 1.
- Did not see any land use maps, detailed crop information maps and maps of food processing facilities that process and products in the 50 miles EPZ. The Tab 1: Introduction, Page 7, states that the responsibility for maps used for recording survey and monitoring data and key land use data, will be with the Department of Agriculture.
- M.1. This criteria not discussed as to general plans and procedures for reentry and to describe means by which decisions to relax protective measures are reached. There should be general plans that include what levels of exposure would be acceptable from ingestion and/or inhalation pathways. It should also include the potential conditions of buildup of contamination in the food pathways or the transfer of contamination, i.e., drainage from land into potable water supplies.
- M.4. This is discussed in Procedure 1. (Pages 1-20).
- N.1.a. Exercises discussed in Tab 1, Introduction, Pages 18 and 19.
- N.2.d. The discussion in Tab 1, Introduction, Page 20, states that Radiological Monitoring Drills will not be conducted in addition to the annual exercise.
- N.2.e.1. This is discussed in Tab 1, Introduction, Page 20.
- N.4. This criteria for observers is discussed in Tab 1, Introduction, Page 19.
- N.5. In Tab 1, Introduction, Page 19, states that observers will be from Federal Agencies; Texas, Arkansas, Louisiana and Mississippi.
- O.1. The plans for training include State Personnel only.



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Attachment E-1  
Office of Emergency Planning  
and Defense Mobilization  
6525 Belcrest Rd., Rm. 853  
Hyattsville, MD 20782

July 21, 1982

Mr. Al Lookabaugh  
RAC Chairperson  
Federal Emergency Management Agency  
Region VI  
Federal Center  
Denton, Texas 76201

Dear Mr. Lookabaugh:

The United States Department of Agriculture (USDA) has reviewed the State Emergency Management Plans for the State of Texas and the counties of Hood and Somervell. The principal focal point of this review was directed to radiological emergency preparedness.

We have evaluated the elements and responsibilities relating to USDA and have enclosed our detailed comments.

The State assigned Annex C to the Texas Department of Agriculture for development and maintenance. Annex C was not received by this office. We would appreciate your sending us a copy, if it is available.

If you have any questions, please feel free to call Mr. Robert Conley or Ms. Dorothy Nevitt of my staff on FTS 436-8051.

Sincerely,

George E. Bickerton, Director  
Office of Emergency Planning  
and Defense Mobilization

Enclosure

cc:  
Charles W. Mayfield, Chairperson  
USDA State Emergency Board  
State ASCS Office, USDA, USDA Bldg.  
Texas A & M University  
College Station, Texas 77840



Attachment E-2

United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
Facilities Comanche Peak Nuclear Power Station

Elements

Comments

A.2.a.

Assignment of Responsibility  
(Organization Control)

The United States Department of Agriculture (USDA) has established in every State and County a disaster assistance network. All USDA agencies having major emergency responsibilities are represented on the various USDA State and County Emergency Boards and the USDA Regional Emergency Staffs. These boards/staffs are an integral part of the USDA network.

This network can react to emergency situations, including radiological accidents/incidents, by utilizing USDA resources to provide assistance/support as needed and requested by the State.

The primary USDA contact for the State of Texas is:

Charles W. Mayfield  
Chairperson, USDA State Emergency Board  
State ASCS Office, USDA, USDA Bldg.  
Texas A & M University  
College Station, Texas 77840  
(713 - 846-8821, Extension 207)

United States Department of Agriculture  
 Food Safety and Inspection Service  
 Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
 Facilities Comanche Peak Nuclear Power Station

Elements

Comments

A.3

Assignment of Responsibility

The Texas State Emergency Management Plan has written agreements between support organizations but does not include the use of USDA resources. Annex C, assigned to the Texas Department of Agriculture, was not received for review by this office.

A request for USDA services would include the use of the USDA State Emergency Board (SEB), the County Emergency Board (CEB) and the Agricultural Extension Agents to notify farmers in the event of a nuclear accident. The SEB is composed of the following agencies: The Agricultural Stabilization and Conservation Service (ASCS), the Statistical Reporting Service (SRS), the Soil Conservation Service (SCS), the Food Safety and Inspection Service (FSIS), the Forest Service (FS), the Animal and Plant Health Inspection Service (APHIS), the Food and Nutrition Service (FNS), the Cooperative Extension Service (CES), the Farmers Home Administration (FmHA), and the Rural Electrification Administration (REA). The efforts of these organizations in providing services are directed and coordinated by the Chairperson of the SEB.

The counties of Hood and Somervell have assigned to the USDA County Emergency Board (CEB) the development of Standard Operating Procedures for Husbandry Activities.

United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
Facilities Comanche Peak Nuclear Power Station

Elements

Comments

E.1

Notification Methods  
and Procedures

The State plan has established procedures for notification of State emergency personnel and the Federal Emergency Management Agency.

The initial USDA contact would be the USDA State Emergency Board Chairperson, Mr. Charles W. Mayfield, (713 - 846-8821, Extension 207).

The counties of Hood and Somervell have established contact with the USDA County Emergency Board. Emergency information will be disseminated to all affected farmers and other agricultural industries through the County Emergency Boards.

Attachment E-5

United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
Facilities Comanche Peak Nuclear Power Station

Elements

Comments

F.3

Emergency Communications

The State plan does include instructions for monthly testing of the emergency communications system. The USDA portion would begin with the Texas Department of Agriculture notifying the USDA State Emergency Board Chairperson, Mr. Charles W. Mayfield, College Station, Texas, (713 - 846-8821, Extension 207).

United States Department of Agriculture  
 Food Safety and Inspection Service  
 Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
 Facilities Comanche Peak Nuclear Power Station

Elements

G.1

Public Education  
 and Information

Comments

The plans do provide for the dissemination of information to the public regarding how they will be notified and what actions should be taken in an emergency as part of the public information program.

At the request of the State, the USDA County Emergency Board will assist in the appropriate protective actions that will be directed to affected farmers and other agribusinesses in the EPZ.

When requested by the State, the USDA State Emergency Board will aid recovery efforts by providing economic assistance from regular Federal Assistance programs. Cost share financing may be available to farmers and other rural residents in rehabilitation efforts; dairy farmers will be indemnified for milk removed from commercial channels; loans and other assistance may be provided to farmers, ranchers, agricultural and other rural residents. Other assistance will be available from regular USDA programs as necessary. Assessment of damage to crops and livestock will be performed by the SEB through the County Emergency Boards (CEB). The CEB's will estimate damage based on radiological contamination and monitoring data. Damage reports will be made to the USDA SEB for consideration in emergency relief programs.

United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
Facilities Comanche Peak Nuclear Power Station

Elements

Comments

J.11

Protective Responses

The plans do include the protective measures to be used for protecting the public from the consumption of contaminated foodstuffs.

The State plan assigns to the Texas Department of Agriculture the development and maintenance of maps for recording survey and monitoring data, key land use data (e.g., farming), food processing plants, and dairies. The maps should start at the facility and include all of the 50 mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process large amounts of food or agricultural products (originating in the ingestion pathway EPZ, but located elsewhere) should also be maintained. A listing of these maps stating their availability, location, and plans for their use would be sufficient. Annex C of the plan which is assigned to the Texas Department of Agriculture was not received for review.

The counties of Hood and Somervell have assigned the development and maintenance of agricultural protective responses to the USDA County Emergency Board.

United States Department of Agriculture  
Food Safety and Inspection Service  
Washington, D.C.

Evaluation of Radiological Emergency Response Plan

State Texas Counties Hood and Somervell  
Facilities Comanche Peak Nuclear Power Station

Elements

Comments

N.4

Exercises and Drills

The plans do include instructions for the required exercises, drills and critique by qualified observers from the State, Federal and local governments.

A USDA designated representative will attend the exercises.

We suggest the alert procedures for USDA be included as follows: The Chairperson of the USDA State Emergency Board in College Station, Texas, (713 - 846-8821, Extension 207) should be contacted.

STATE OF TEXAS EMERGENCY MANAGEMENT PLAN  
TEXAS DEPARTMENT OF HEALTH, ANNEX L  
BUREAU OF RADIATION CONTROL, APPENDIX 7 (RADIOLOGICAL EMERGENCY RESPONSE)  
TAB 1: FIXED NUCLEAR FACILITY ACCIDENTS  
CHAPTER 1: COMANCHE PEAK STEAM ELECTRIC STATION  
PROCEDURES (IMPLEMENTING OR STANDARD OPERATING)

GENERAL:

Plan is well organized with an excellent cross-reference to NUREG-0654. Both the planning and operating concept for the state of Texas are easily identified and portrayed as one in which Radiological Emergency Preparedness is treated as another potential emergency situation with assigned responsibilities being accomplished in the same manner as they would for any other emergency.

SPECIFIC: (NUREG-0654 criteria)

A. ASSIGNMENT OF RESPONSIBILITY

- 1.a. The State of Texas Emergency Management plans adequately identify State, Local Federal and Utility response organizations. (State Plan p.5 and pp. 1-2-3 of tab 1 to appendix 7)  
O.K.
  - b. At the State level the Bureau of Radiation Control is organized into 3 operational divisions on a day-to-day basis and into 3 elements for emergencies. (p. 4, appendix 7)  
O.K.
  - c. State Department assignment of responsibilities for radiological emergency response illustrated in block diagram. (p.25 attachment 2 to appendix 7)  
O.K.
  - d. The Director of the Division of Emergency Management as Chairman of the Emergency Management Council has overall control. He is advised appropriately by other state agencies. For radiological emergencies in descending order he would be advised by the Commissioner of Health, the Chief of the Bureau of Radiation Control and the Chief of Field Operations.  
O.K.
  - e. Receipt of warning of or actual emergency conditions exists on a 24 hour basis both at the district and state level of the Disaster Emergency Management offices. Response would be initiated at the Public Health Region or State level of response, determined by the Director, Division of Compliance and Inspection.  
O.K.
- 2.a. Within the state plan, primary and support responsibilities for major elements are shown by table. (Annex L) Functions and responsibilities defined. (Appendix 7 lists functions and title of responsible individual for each function.)



Assignment of responsibility cont'd

- b. State Emergency Management Plan, Annex L, Appendix 7 all list legal basis for authorities.  
O.F.
  - 3. State plan has signature page for state agencies. American Red Cross functional statement included. (Annex L) Tab 1 to Appendix 7 has responsibilities of other state departments and utility listed. Written agreements with U.T. Austin and Texas A&M.  
O.K.
  - 4. State plan. Capability of Health Department contained in annex L. State EOC (DPS/DEM) capability for 24 hour per day operations noted. Appendix 7 under Logistics Support, Emergency Recall Procedures and Supervisory responsibility assignments by individual  
O.K. (NOTE CORRECTION TO CROSS-REFERENCE OF APPENDIX 7)
- B. ONSITE EMERGENCY ORGANIZATION
- 2. While 0654 does not indicate nor require that this element should be addressed by State/Local governments you may wish to consider noting the individual (by title) at the licensee's facility who is responsible for initiating emergency actions, including recommendations regarding protective actions to offsite authorities.
- C. EMERGENCY RESPONSE SUPPORT AND RESOURCES
- 2.a. State response team will consist of a utility liaison team (three, 1-man shifts) which will be deployed to the near-site EOF.  
O.K.
  - 4. SMARAP listed as first option for outside assistance. Note also that laboratory facilities at U.T. Austin and TEXAS A&M have agreed to provide assistance. Letters of agreement and capabilities included.  
O.K.
- D. EMERGENCY CLASSIFICATION SYSTEM
- 3. State classification scheme is consistent with Federal Guidance and that of the utility.  
O.K.
  - 4. State response levels are appropriate and consistent with the utility's and 0654 warning classification.  
O.K.
- E. NOTIFICATION METHODS AND PROCEDURES
- 1. Bases for notification consistent with 0654, appendix 1. Verification Procedures will be employed.  
O.K.

NOTIFICATION METHODS AND PROCEDURES cont'd

- 2 State Plan. Each state department designates three individuals to be contacted in time of emergency. Within DCH, the Director of Disaster Response has Regional and Bureau Chiefs telephone numbers who in turn have designated 3 - 5 individuals for contact. Appendix 7 indicates once the Bureau of Radiation Control receives notification it is passed to the Director, Division of C & I descending to 3 branch administrators. Attachment 5 indicates recall procedures by name and telephone number. (See also appendix 7, VI B, "Organization for Emergencies" for mobilization of emergency response personnel.  
O.K.
3. Appendix 7 only. Referenced part of plan is a sample message for which includes those objectives addressed in the 0654 element.  
O.K.
5. This item to be addressed by local plans and normal DPS procedures (Annex R) to be followed.  
O.K.
6. Responsibility assumed by local government and DPS. (Annex R)  
OK.
7. Local government responsibility. Bureau of Radiation Control will advise local government re: protective measures.  
O.K.

F. EMERGENCY COMMUNICATIONS

- 1.a. State plan directs agency heads to develop appropriate notification procedures. Reference DPS (Annex R) and DEM (Annex AA) as primary responsible agencies for 24 hour per day communications links. Also references local plans.  
O.K.
- b. Annex R (DPS), local plans. Contiguous states not applicable to this site.  
O.K.
- c. DPS/DEM (Annex R and AA respectively) Tab 1 indicates proper channels are DEM/FEMA Region VI via telephone, NAWAS and NACOM.  
O.K.
- d. Annex R. Local plans for communications. Radiation Monitor team members will have radio contact with team leaders.  
O.K.

EMERGENCY COMMUNICATIONS cont'd

- e. State plan assigns responsibility to agency heads. Indicates priority of order call to be established within council agencies. Health Department responsibility for alert and activation of emergency personnel is responsibility of the Director of Disaster Response Program. (Warning and emergency communications is responsibility of DPS. Agency notification is responsibility of DEM) O.K.

- 2. Local plan/responsibility only.

G. PUBLIC EDUCATION AND INFORMATION

- 1. Annex AA and local plan O.K.
- 2. Local plan O.K.
- 3.a. Responsibility of State Emergency Public Information Officer; Bureau of Radiation Control will have spokesperson who will coordinate with licensee and local government counterparts. DPS coordinates all public information. DEM coordinates public information from State EOC. O.K.
- 4.a. DEM has primary responsibility for dissemination of emergency public information. Single point of contact for EPI release and for persons seeking information is DEM. Bureau of Radiation Control will have public information coordinator. O.K.
- b. Bureau of Radiation Control Public Information coordinator will arrange for timely exchange of information with appropriate licensee and local government public information personnel. O.K.
- c/ Same individuals as above will coordinate information releases to correct or forestall rumors. O.K.
- 5. Local government responsibility. Bureau of Radiation Control will assist in development of Public Information materials to be released for annual exercise of plan.

H. EMERGENCY FACILITIES AND EQUIPMENT

- 3. State EOC, DPS Austin and State District EOC (Waco) (See local plans) O.K.

EMERGENCY FACILITIES AND EQUIPMENT Cont'd

- 4. State agency personnel who have operational responsibility will staff State and District EOC's  
O.K.
- 11. Applicable emergency supplies and protective equipment listed in procedures. Communications equipment DPS responsibility. Radiation monitoring team equipment and supplies listed in attachment 6 of Chapter 1 of tab 1 to appendix 7 annex L. Other emergency supplies listed as procedures 2 - 6.  
O.K.

I. ACCIDENT ASSESSMENT

No FEMA assigned review elements

J. PROTECTIVE RESPONSE

- 10.a. Map depicting monitoring points located in Chapter 1 of tab 1. Other maps local government responsibility.  
O.K.
- b. Local government responsibility
- c. Local Government responsibility
- d. Consideration made for mobility impaired through sheltering, respiratory protection (filtering air, limiting outside air intake etc.) evacuation or use of KI.  
O.K.
- f. No KI to be used for general populace. KI will be administered to emergency workers in accordance with Protective Action Guides.  
O.K.
- g. Local government responsibility
- h. " " "
- i. " " "
- j. "Contamination Control" addresses control of access to exclusion area and responsibilities for control.  
O.K.
- k. No significant impediments noted
- l. Local government responsibility
- 11. Annex C and appendix 2 and 9 of Annex L not available for review, however, tab 1 appears to sufficiently address this element. Department of Agriculture responsible for land-use maps. Monitoring points map noted.  
O.K.

PROTECTIVE RESPONSE Cont'd

- 12. State plan indicates evacuees are responsibility of hosting government. Local plan responsibility. O.K.

K. RADIOLOGICAL EXPOSURE CONTROL

- 3.a. Bureau of Radiation Health Contamination Control team will provide dosimetry. Emergency worker dose record noted. O.K.

L. Medical and Public Health Support

- 3. (Appendix 3, 11 and 12 to annex L. Appendix 3 contains functional statement for Bureau of Emergency Management. Appendix 11, Public Health Regions functional statement "to be developed". Appendix 12. Functional statement for licensing and certification.)

Tab. 1, Chapter 1 Page 10, item 9 lists 3 hospitals capable of handling radioactively contaminated individuals. Hospitals have agreed to accept these individuals. Hospitals do not have letters of agreement (Local plans?)  
How many radioactively contaminated individuals can the hospitals handle at one time?

- 4. Reference is made to appendices 3 and 11 of annex L. Functional Statements for the appendices is insufficient to determine the capability for transporting contaminated individuals to medical facilities. Either the functional statements should be expanded to include this or appendices 3 and 11 made available for review. If this is local plan responsibility for addressing, O.K. Needs clarifications.

M. Recovery and Reentry Planning and Postaccident Operations

- 1. State plan part 3, describes concept of operation by the State for recovery and reentry following a disaster. Annex L, Appendix 7, Procedures 1-5. The Emergency Management Council supervises all disaster recovery operations. Division of Emergency Management is focal point for managing all phases of disaster operations. Bureau of Radiation Control (accident assessment team) makes assessment and recommendations to Council. Procedures for Chapter 1, to Tab 1 describe methodology and reference PAG's.
- 3. Part 3 of the State Plan references general state procedures for recovery operations. Appendix 7 indicates the Chief of the Bureau of Radiation Control will be responsible for determining when operations may be phased down or concluded. O.K.

N. EXERCISES AND DRILLS

- 1.a. Annex L. General. Inherent skills maintained day-to-day. Appendix 7 tab 1. VIII of introduction, page 8 indicates all emergency response personnel will receive initial and annual retraining applicable to their duties. Attachment 4 addresses training, drills and exercises both generally and specifically. Exercises are to be in accordance with FEMA requirements.  
O.K.
- b. Criteria addressed in tab 1, attachment 4, II.A. No reference to unannounced exercise however, indication is that exercises will be in accordance with FEMA requirements.  
O.K.
- 2.a. Communications drills adequately addressed. While some drills not conducted explicitly for GNGF accident/incident, in essence capability is exercised through normal day-to-day use more frequently than criteria requires.  
O.K.
- 2.e. Appendix 7, tab 1. attachment 4, B.2. p.20 indicates H.P. drills to be conducted semi-annually.  
O.K.
- 3.a. Scope of exercises to be in accordance with FEMA requirements. Plan does not specifically address exercise objectives and evaluation but is implied if conducted in accordance with ;EMA requirements.  
O.K.
- b. Same as above.
- c. " " "
- e. " " "
- f. " " "
- 4. Tab 1. Attachment 4, II. A, p. 19 indicates critique will be conducted, evaluation made of exercise comments and necessary plan changes made.  
O.K.
- 5. Tab 1, attachment 4, II, A. p.19 addresses evaluation of observer comments and procedural changes in plans. Plan review and up-date is addressed sufficiently in appendix 7, XI, "Plan Maintenance".  
O.K.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

1. Training of state response personnel addressed in annex L. Appendix 7, VIII addresses training of response team members. Tab 1, attachment 4 further addresses training. (Not referenced)
  - b. Training of off-site state response personnel sufficiently addressed. Local emergency response personnel training to be addressed in local plans.
- 4.a. Attachment 4 to tab 1 indicates all Bureau of Radiation Control personnel will receive training.
  - b. Planners, utility liaison, accident assessment, monitoring, analysis, contamination control, decontamination, medical liaison, instrument calibration and maintenance, public information, logistics support personnel are specifically identified for training.
  - d. Identified as local plan items of concern
  - f. " " " " " " "
  - g. " " " " " " "
  - j. Local responsibility primarily. DPS to supply capability for communicating emergency information of necessary and for field monitoring teams.  
O.K.
5. Plans generally indicate the necessary training to perform assigned duties are inherent in position the individual holds. Tab 1 indicates individuals will receive initial and annual retraining applicable to their duties.  
O.K.

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

1. Plan notes responsibility for appropriate training; for planners specifically, they will or have attended FEMA planning course.  
O.K.
2. Plans indicate the coordinator, DEM is responsible for overall State Emergency Management Plan. The Chief, Bureau of Emergency Management has planning responsibility for the Health Department. Within the Bureau, the Director, Division of Compliance and Inspection has the authority and responsibility for REP plans.  
O.K.
3. Same lines of responsibilities and authorities as above.  
O.K.

RESPONSIBILITY FOR PLANNING cont'd

4. Provisions for up-date for all plans. All persons holding plans or having emergency assignments under the plan within the health department will review and make recommendations for changes annually. Same for appendix 7. If no changes needed, certification of currency will be issued annually.  
O.K.:
5. Plans will be distributed; changes will be dated and marked to indicate where changes have been made.  
O.K.
6. State Plan, part 1. attachment 4 lists state agency and respective annex. Annex L references the State Plan and 12 appendices thereto. Appendix 7 notes tabs, while tab 1 consists of chapter(s). Supporting plans were noted.  
O.K.
7. Implementing procedures for tab 1 are contained as a separate part of the plan. The procedures are self-explanatory (by name) as to that part of the plan they are designed to implement.  
O.K.
8. Table of contents and 0654 cross-reference supplied. While the cross-reference is not a part of the plan, constructed separately for the State Emergency Plan, Annex L and Appendix 7 it is more easily referenced by reviewers.  
O.K.
10. Telephone numbers of response personnel will be updated annually. SHOULD BE QUARTERLY

John Benton  
FEMA R-6





Attachment G-1  
JUL 22 1982  
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Al  
gh

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

July 21, 1982

Mr. Albert L. Lookabaugh  
Chairman, Regional Assistance Committee  
Natural and Technological Hazards  
Federal Emergency Management Agency  
Federal Center  
Denton, Texas 76201

Dear Mr. Lookabaugh:

We have completed our review of the Texas Radiological Emergency Response Plan as requested in your memorandum of June 18, 1982. Our comments are enclosed.

In accordance with Fema Guidance Memorandum 16, we did not assign acceptable/unacceptable/missing designators, but made narrative statements about each element.

In general, we found the Plan to be a great improvement over the draft version we reviewed in May, 1981. The great bulk of material that was missing from the draft has now found its way into the present Plan.

Our review was greatly facilitated by the effort the preparers of the Plan put into indexing and cross-indexing. Without indexing, our review would have required several times as much effort (and time) because of the sheer bulk of the Plan and its many component parts. Even with all the careful indexing, however, several component parts were difficult to find. The CPSES Plan, for example, was found as Chapter 1 of Tab 1, but does not appear in any of the Tables of Contents. We strongly recommend that Fema encourage, or, if possible, require future Plan preparers to include a comprehensive cross-index in all plans submitted for RAC review.

In general, we find the parts of the Plan that we reviewed to be workable, and in line with the Fema-Rep-1 Criteria.

Mr. Hank May of my staff will be pleased to meet with the RAC to explain any of our comments, or will do so by telephone if a meeting is not required.

Sincerely yours,

for Norman E. Dyer, Ph.D., Chief  
Pesticides & Toxic Substances Branch

Enclosure

DETAILED COMMENTSA.2.a. Functions and Responsibilities

Responsibilities have been assigned in App. 7, chap. VII and in the matrix on p. 31. Appropriate required training is specified in chap. VIII.

Accident Assessment

App. 7, p. 10 specifies up to 4 persons per shift, with provisions to augment. Responsible official is clearly indicated. Training at Fema's Accident Assessment Course is specified on p. 18.

Protective Response

Hood Co. Plan p. 49, Radef Officer has responsibility.

Exposure Control

Co. plan p. 49 notes this is primarily a TDoH function. App. 7 p.11 discusses this under Contamination Control, and responsibility is included as a duty of the Team Leaders, p. 8.

Co. plans cover this in chap. VI.

A.3. Written Agreements with Support Agencies

The Plan has been developed under the philosophy that most operations are required by statute, and special written agreements are not needed. It is assumed that accidents can be handled with State and local resources and that no Federal assistance will ever be needed or requested. This is hopefully correct, but it can never be assured. The Plan should at a minimum recognize that the need for Federal assistance, or a Federal presence, is at least possible, and assign responsibilities and authorities to appropriate staff, and establish procedures for requesting Federal assistance.

C.1.c. RAP/IRAP Support Resources

Neither EPA nor IRAP have been designated for potential support roles, since the need for Federal assistance is not anticipated.

C.3. Radiological Laboratory Capability

Radiological support laboratories are identified: mobile Health Dept. lab in Tab 1, Chp. 1, p. 7, UT and Texas A&M in Tab 1, p. 8. Federal lab support is not anticipated.

C.4. Other Emergency Assistance

No outside assistance is anticipated other than that which might be obtained through the Southern Mutual Radiation Assistance Plan (except see C.3. above), or that which is provided by statute.

E.1. Notification of Response Organization

Notification forms are Attachment 4 and 5 of Tab 1, Chp. 1. Bases for notification are given in Tab 1, Chp. 1. Verification procedures are not included for State notifications, since verification is covered by SOP's. However, verification is indicated in App. 7, Attachment 6. Local plans specify verification.

## E.3. Content of initial notifications are specified in Attachment 4 and 5 of Tab 1, Chp. 1, and content is appropriate.

H.7. Offsite Radiological Monitoring Capability

Appropriate offsite monitoring equipment is provided for, as specified in Attachment 6 of Tab 1, Chp. 1.

H.11. Emergency Kit Inventory

Radiological monitoring kits do not specifically include operating manuals for equipment, check sources, or site maps.

I.7. Field Monitoring Within the EPZ

Adequate capability and resources for monitoring the plume exposure EPZ is indicated in Tab 1, Chp. 1. Training and refresher provisions are outlined in Tab 1, Attachment 4.

I.8. Assess Radiological Hazards

Capabilities to perform rapid assessments of radiological hazards are indicated in App. 7 and Tab 1. Notification arrangements are shown in App. 7, Sec VI. C and Attachments 5 and 6, are adequate. Provisions include computer graphics terminals with hard-copy output.

I.9. Capability to Measure Radioiodine

Radioiodine monitoring provisions use silver zeolite (App. 7, p. 9). Aucillary equipment as described in Tab 1, Chp. 1, p. 7 is adequate.

I.10. Dose Rates from Key Radionuclides

Procedure I merely references EPA's Manual of Protective Actions and Guides for dose conversion techniques and Attachment 4 to Procedure I lists levels for key nuclides in the ingestion pathway. While the methodology is thus included by reference, the Plan would be improved greatly if explicit details were to be included to make the dose projections. Consideration should be given to including nomograms.

EPA's National Interim Drinking Water Regulations are not intended for application to accident or short term situations, but rather chronic long-term exposures. Consequently, the Appendix B levels of nuclides which correspond to 4 mrem/yr annual dose are those calculated for the 50th year of exposure. This makes little or no difference for short half-life nuclides, but can be important for long-life nuclides, and can lead possibly to excessive conservatism in some cases. Procedure I will be improved if it is revised to clarify this point. Also, as with the PAG dose conversions incorporated by reference, the Procedure will be further improved if explicit procedural details are added for this pathway.

I.11. Track Airborne Radioactive Plume

Arrangements to locate and track the plume are indicated in Tab 1, Chp. 1, p. 7.

J.9. Implementation of Protective Action Criteria

The Plans indicate a capability for implementing required protective measures. Protective Action Guides presented in Procedure I attachments are consistent with EPA guides.

J.10.m. Bases for Plume Exposure Protective Action

The bases for choice of protective actions are presented in Tab 1, Chp. 1, Procedure I. Evacuation times are in Local Plans Attachment G, the Comanche Peak Emergency Procedures Manual (p. 209).

J.11. Protective Measures for Ingestion

Protective measures to be used for the ingestion pathway are presented in Tab 1 Introduction and Chapter 1, Procedure I and Attachments. Protective Actions and procedures are appropriate.

J.12. Registering and Monitoring of Evacuees

Monitoring equipment at relocation centers is apparently the Civil Defense instruments. I finally located monitoring procedures in Attachment H of the CPSES, but I never did find it indexed anywhere. Monitoring equipment should be specified.

K.3.a. Emergency Worker Dose Determination

Contamination Control Team handles this (Tab 1, Chp. 1, p. 9). Sufficient staff are available to ensure 24-hour coverage. Exposure record form is presented as Attachment 8 of Tab 1, Chp. 1. Limitation of worker exposures is also addressed in CPSES Procedure 1, p. 1-6(6).

K.3.b. Maintain Dose Records

Methods for keeping accurate emergency worker exposure records are presented in Tab 1, Chp. 1, V.C. 7.

K.4. Authorize Emergency Overexposure

I could not find specific reference to the authority who can authorize emergency exposures of workers to doses in excess of the PAG's. Evidently excess exposures are not to be permitted.

K.5.a. Decontamination Action Levels

Decontamination action levels are presented in Tab 1, Chp. 1, Procedure 1, Attachment 5.

K.5.b. Decontamination Means

Decontamination means are presented in Attachments 4, 5 and 6.

M.1. Reentry and Recovery Plans/Procedures

General plans and procedures for reentry and recovery are presented in Procedures 1, 3, 4 and 5 of Tab 1. Criteria are given in Procedure 1, Attachment 5-2, and are appropriate.

M.4. Estimate Population Exposure

Provisions for measuring total population exposure are presented in Procedure 1, p. 1-20.

N.2.d. Radiological Monitoring Drills

Attachment 4 to Tab 1 Intro. (p. 20) asserts that drills over and above those conducted during annual exercises are not necessary, since the staff perform such activities routinely. This may be true at present, but the situation could change in the future. The Plan would be a better one if it specified that additional drills would be carried out if exercise debriefing or critiques should indicate this need. Additional drills may also be appropriate as staff assignments are changed, new equipment is acquired, or new procedures are instituted.

N.2.e.(1) Health Physics Drills

Semi-annual drills are planned (Attachment 4 to Tab 1 Intro.) for each 4-man shift of the Accident Assessment team.

N.4. Observation and Critique of Exercises

Provisions for critique by Federal representatives, and by cooperative arrangements with adjacent States, are provided in Attachment 4 of Tab 1 Intro.

0.1. Training

This is covered in Attachment 4 of Tab 1 Intro.

0.4.a. Director/Coordinator Training

This is covered in Attachment 4 of Tab 1 Intro., I.A.

0.4.b. Accident Assessment Personnel

This is covered in Attachment 4 of Tab 1 Intro., I.B.3.

0.4.c. Radiological Monitoring Teams

This is covered in Attachment 4 of Tab 1 Intro., I.B.4,5.

# ARGONNE NATIONAL LABORATORY

9700 SOUTH CASS AVENUE, ARGONNE, ILLINOIS 60439

CENTER FOR TRANSPORTATION RESEARCH

Building 12

TELEPHONE 312/972-5633

Attachment H-1

July 21, 1982

Mr. Albert L. Lookabaugh  
Emergency Management Specialist,  
RAC Chairman  
FEMA Region VI  
Loop 288  
Denton, Texas 76201

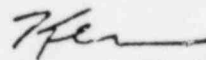
Dear Al:

Enclosed per your request are our written evaluations of the Radiological Emergency Response Plans of the State of Texas and Hood and Somervell Counties for the Comanche Peak Steam Electric Station. If you have questions concerning the items relating to radiological health and safety, please call Lloyd Lewis (8-972-7705). Questions concerning other items can be answered by Floyd Davis (8-972-6328). They prepared the documents and my review of their work indicates that they did a thorough, excellent job. I hope our input aids your RAC review process.

If you have any trouble reaching either of them directly, I will be happy to make sure your questions are answered.

Al, please be sure to let me know as soon as you have a definite date for the October Waterford 3 exercise.

Sincerely,



Kenneth M. Bertram  
Region VI Coordinator

KMB:lb

Enclosure

cc: T. Surles  
F. Davis  
L. Lewis  
C. Wingo  
J. Benton

State of Texas  
Evaluation of Radiological Emergency Response Plan  
For Comanche Peak Steam Electric Station

Attachment H-2

A. Assignment of Responsibility (Organizational Control)  
Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by state and local organizations within the Emergency Planning Zone have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

<u>Location/Item</u>		<u>Reference/Comment</u>
A.1.a.	?	The plan does not identify the Federal organizations that should be part of the overall response organization. The only private sector response organization named is the American Red Cross, although universities and laboratories are given response assignments. References are the preamble to the state plan; Part I of the state plan; Tab. 1 of Appendix 7.
A.1.b.	*	Sec. V.B.5 and Sec. V.B.6 of Appendix 7.
A.1.c.	*	Appendix 7, Attachment 2 and Attachment 1, Tab. 1 of Appendix 7.
A.1.d.	*	Sec. VII.A.2
A.1.e.	?	The plan does not specifically state that each response organization can provide 24-hour per day response and manning of communication links. References are Sec. VI.C of Appendix 7 and Sec. VII.A.4 of Annex L.
A.2.a.	*	Sec. II.B.4 of Appendix 7; Sec. VII.C.6.
A.2.b.	*	Sec. I. A of Appendix 7.
A.3	*	Sec. VII, Tab. 1 of Annex 7; signature pages are found in the preamble to the state plan.
A.4	*	Tab. 1, Introduction; Sec. VI.B.4 and Sec. I; Appendix 6, Annex L; Tab. 1, Chap. 1, Sec. V. C.5.



C. Emergency Response and Resources  
Planning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate state and local staff at the licensee's near-site Emergency Operations Facilities have been made, and other organizations capable of augmenting the planned response have been identified.

<u>Location/Item</u>		<u>Reference/Comment</u>
C.1.a	*	Sec. 2, B.4, Part 3, Appendix 7.
C.1.b.	?	Sec. VI.B.4, Appendix 7 states that "Requests for Federal operational assistance are not anticipated". However, this does not necessarily preclude the need. Moreover, NUREG-II.C.1 states that "Each state and licensee <u>shall</u> make provisions for incorporating the Federal response capability into its operation plan".
C.1.c.	*	See C.1.b. above.
C.2.a.	*	Sec. V.C, Tab. 1, Chap. 1, Appendix 7.
C.3	*	Sec. V.C, Tab. 1, Chap. 1, and Sec. VII.1, Tab. 1 Introduction, Appendix 7 and Appendix 6, Annex L.
C.4	?	Sec. VI.B.4, Tab. 1 Introduction, Appendix 7, states that requests for Federal assistance are not anticipated but the Southern Mutual Radiation Assistance Plan is referenced.

<u>Location/Item</u>		<u>Reference/Comment</u>
D.3	*	Sec. III, Chap. I, Tab. 1 in Appendix 7.
D.4	*	Sec. III and IV; Chap. I, Tab. 1, Appendix 7.

E. Notification Methods and Procedures  
Planning Standard

Procedures have been established for notification, by the licensee of state and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

<u>Location/Item</u>		<u>Reference/Comment</u>
E.1	*	Sec. III, Chap. I, Tab. 1 and, Sec. II.B, Attachment 4, Tab. 1, Introduction, Appendix 7.
E.2	*	Sec. VI.C, Appendix 7.
E.5	?	The local government plans and the Department of Public Safety Plan, Annex R, Appendix 2 cover dissemination of information to the public. However, this information should also be in the state plan. Appendix R is not a part of the radiological emergency response plan. Appropriate material should be extracted from the Department of Public Safety and local plans and inserted in the state plan to make the radiological emergency plan more responsive to the needs of emergency response personnel.
E.6	?	Comments in E.5 above apply.
E.7	*	Responsibility for messages giving instructions to the public regarding protective actions are "delegated to the local governments who are responsible for message contents. However, NUREG-0654, II.E.7 states that messages "shall be prepared and included as part of the state and local plans."

F. Emergency Communications  
Planning Standard

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

<u>Location/Item</u>		<u>Reference/Comment</u>
F.1.a.	?	The cross reference cites Annex R and Annex AA for information about 24-hour notification and activation of state and local response networks. Appropriate sections of these annexes should be included in the state radiological emergency response plan, Appendix 7 to make the plan more convenient for emergency response personnel.
F.1.b.	?	Comment F.1.a. applies.
F.1.c.	*	Tab. 1, Appendix 7.
F.1.d.	*	Tab. 1, Appendix 7.
F.1.e.	*	Sec. VI.C, Appendix 7.
F.1.f.	N/A	Utility responsibility.
F.2	N/A	The cross reference states that local governments are responsible for communications for mobile and fixed medical support facilities.
F.3	*	Appendix 7, Tab. 1, Introduction section.

G. Public Education and Information  
Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

<u>Location/Item</u>		<u>Reference/Comment</u>
G.1.	N/A	Responsibility of local governments only.
G.2.	N/A	Comment for G.1 above applies
G.3.a.	*	Sec. VII.B.10, Appendix 7; Sec. VII of Tab. I Introduction, Appendix 7.

G.3.b.	N/A	Licensee responsibility
G.4.a.	*	Sec. VII.B.10, Appendix 7.
G.4.b.	*	Sec. VII.B.10.a, Appendix 7.
G.4.c.	*	Sec. VII.B.10.c, Appendix 7.
G.5	?	Coordinated programs for the news media are shown in the cross references as responsibilities of the local governments. However, the references in the local plans make no mention of coordinated programs for the media.

#### H. Emergency Facilities and Equipment Planning Standard

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

<u>Location/Item</u>		<u>Reference/Comment</u>
H.1		N/A
H.2		N/A
H.3	*	Part two, Section III.A.3.a as well as Annex L, Section VII.A.2 and Section VII.A.3 show that s state EOC is in use at Austin and that the State Disaster District 6A-EOC is in use at Waco.
H.4	?	Part II Section III.A.3, Section III.B.1 and Section III.B.2 provide for the timely activation of the EOCs. Attachment 5 to appendix 7 gives the emergency recall procedures for the field teams and EOC liaison staff. The plan Part II Section III indicates that the state coordinator of the Division of Emergency Management and the Disaster District 6A committee chairman activate the Emergency Management Council. The council members are responsible for procedures to maintain operational capability. These procedures should be made a part of the plan.
H.5		N/A

- H.6 N/A
- H.7 \* Tab. 1 Chap. I; Section V.C.3 adequately describes the field monitoring teams and their functions.
- H.8 N/A
- H.9 N/A
- H.10 \* Appendix 7 Section VII.B.11 adequately describes the calibration and maintenance of the emergency instruments.
- H.11 ? Tab. 1 Chap. I Attachment 6 lists monitoring team equipment. In general, this is an excellent set of instruments. However, there is one deficiency. The Ludlum 14C meter uses a GM tube on the X 1000 range (0 to 2 R/hr). According to the manufacturer, if the radiation level is more than about 8 R/hr the GM tube avalanches and the meter reading will go to zero. A high range, non overloading type meter (e.g. ion chamber) is needed for measurements of high radiation levels in the plume for serious emergencies. Equipment listed in the following references is adequate:  
Tab. 1 Chapter 1 Procedure 2 Section IV  
Tab. 1 Chapter 1 Procedure 1  
Tab. 1 Chapter 1 Procedure 3 Section IV  
Tab. 1 Chapter 1 Procedure 4 Section IV  
Tab. 1 Chapter 1 Procedure 5 Section IV  
Tab. 1 Chapter 1 Procedure 6 Section IV
- H.12 \* Tab. 1 Chapter 1 Section V.C.2,4,5, and 6 describe adequately the collection and processing of samples & field data. No location for the field van (mobile laboratory) is given. It should be conveniently located with respect to the EOF.

I. Accident Assessment  
Planning Standard

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

<u>Item/Location</u>	<u>Reference/Comment</u>
I.1	N/A
I.2	N/A
I.3.a,b	N/A
I.4	N/A
I.5	N/A
I.6	N/A
I.7 ?	The field monitoring teams are well equipped except for the lack of a high range non over-loading survey meter. (See comment for item H.11).
I.8 ?	Most of the items for Item I.8 are adequately covered in Tab. 1, Chapter 1 Section IV and V. However, there are concerns about the estimated deployment time of 4 hours especially in a rapidly escalating emergency. Section IV clearly gives the individual assigned to Utility Liaison the task of obtaining data to evaluate the event and to advise the Bureau Chief, The Chief of Field Operations and the Accident Assessment Team Leader. Procedures should be developed that provide for activation and deployment at the earliest appropriate time.
I.9 *	Appendix 7 Section VII.B.3 and Tab. 1 Chapter 1 Section V.C.1 adequately describe the equipment and methods for measuring radiiodine concentrations in air.
I.10 *	Procedure 1; Section VII A.1.b and Procedure 1; Section V.C adequately describe the methods and procedures for calculating the projected radiation doses and the total population exposure.

- I.11 \* Appendix 7; Section VII.B.3 and Tab. 1 Chapter 1; Section V.C.3 adequately describe the monitoring capability for the airborne plume.

J. Protective Response  
Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>Item/Location</u>		<u>Reference/Comments</u>
J.1		N/A
J.2		N/A
J.3		N/A
J.4		N/A
J.5		N/A
J.6		N/A
J.7		N/A
J.8		N/A
J.9	*	Appendix 7 Section 7 Parts A,B,C,D,E,G,H, and Annex L adequately establish the capability for implementing protective measures.
J.10.a	*	Tab. 1 Chapter 1 Attachment 7 adequately locates preselected sampling points. Evacuation routes, areas, relocation centers and shelter areas are described in the local plans.
J.10.b	?	Maps giving the required information should be available in the State EOC and District EOC for reference. They should be included in the state plan document.

- J.10.c N/A - Local government responsibility.
- J.10.d \* Tab. 1 Chapter 1 Procedure 1 Section A.4.a(3) describes the protective actions for persons institutionally confined.
- J.10.e \* Tab. 1 Chapter 1 Procedure 1 Section A.4 describes when radioprotective drugs will be used. The utility will maintain a supply of K I at the EOF.
- J.10.f \* Tab. 1 Chapter 1 Procedure 1 Section VII.3 and .4 describe conditions for possible use of K I for emergency workers and the institutionally confined. No K I will be given to the general public.
- J.10.g N/A - Local Government function.
- J.10.h N/A - Local Government function.
- J.10.i N/A - Local Government function.
- J.10.j \* Appendix 7 Section VII.B.7 and Tab. 1 Chapter 1 Section V.C.7 describe adequately the procedures to be used for the control of access to contaminated areas.
- J.10.k \* Impediment to evacuation are adequately covered in the Attachment G - Evacuation Plan in the Hood county and Somervell county plans.
- J.10.l \* Time estimates for evacuation are covered adequately in the Attachment G - Evacuation Plan in the Hood county and Somervell county plans.
- J.10.m \* Attachment 7 Tab. 1 Chapter 1 Procedure 1 Section VII Parts A3 and 4 together with attachments 1, 2 and 3 to Procedure 1 describe the basis of choice of each protective action.
- J.11 \* Tab. 1 Introduction, Tab. 1 Chapter 1 and Tab. 1 attachment 1, 2, 4 describe adequately the procedures to be used for the ingestion pathway.



J.12

N/A - This is a local government function.

K. Radiological Exposure Control  
 Planning Standard

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

<u>Item/Location</u>	<u>Reference/Comments</u>
K.1	N/A
K.2	N/A
K.3.a	? Tab. 1 Chapter 1 Section V.C.7 states that the Bureau of Radiation Protection will provide personal dosimetry devices for all emergency workers and members of the public who must enter an exclusion area. Tab. 1 Chapter 1 Attachment 8 - Emergency worker radiation exposure record has provisions for both TLD and pocket dosimeters. Provisions for early distribution from local sources need to be developed so that local workers are covered during the estimated 4 hour deployment time at the beginning of an emergency.
K.3.b	? Procedures should be developed for emergency workers to report dosimeter readings frequently to their EOCs. This is especially important for field monitoring teams who go into the plume. Additional procedures requiring notification to the EOC by a worker when his dose has reached a specified level (e.g. 1 R) should be in place. A special set of instructions should be available for a member of the public who must go into an exclusion area. The record form Tab. 1, Chapter 1 Attachment 8 is good but the exposure information is not available until the individual leaves the exclusion area.

K.4	?	A statement of who authorizes emergency workers to exceed the PAGs and under what circumstances was not found.
K.5.a.	*	Reference Tab. 1 Chapter 1 Procedures 1, 4, 5 and 6 give the required action levels. Reference is made to a Texas Department of Health guideline which should be included in the plan as part of Procedure 4.
K.5.b.	*	Decontamination procedures are adequately described in Tab. 1, Chapter 1 Procedures 1, 4, 5 and 6.
K.6		N/A
K.7		N/A

L. Medical and Health Support  
Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

L.1	*	Sec. V.C.9, Tab. 1, Annex 7.
L.2	N/A	Licensee responsibility.
L.3	?	Appendices 3, 11 and 12 of Annex L list hospitals capable of providing medical support for contaminated injured personnel. Extractions from these appendices as appropriate should be included in the plan for convenience of emergency response personnel.
L.4	?	Comment for L.3 above applies.

M. Recovery and Reentry Planning and Post Accident Operations  
Planning Standard

General plans for recovery and reentry are developed.

<u>Item/Location</u>		<u>Reference/Comments</u>
M.1	*	Procedures 1, 2, 3, 4 and 5, Procedures section, Tab. 1, Appendix 7.
M.2	N/A	Licensee responsibility.
M.3	*	Sec. VII.A.2.

M.4 \* Sec. VII.C.

N. Exercises and Drills  
Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

<u>Item/Location</u>		<u>Reference/Comments</u>
N.1.a.	*	Section II.A, Attachment 4, Tab. 1 Introduction, Appendix 7.
N.1.b.	*	Sec. II.A, Attachment 4, Tab. 1, Introduction, Annex 7. But no mention is made of provisions for starting exercises between 6:00 p.m. and midnight and between midnight and 6:00 a.m.
N.2.a.	*	Sections II.B.1 and II.C, Attachment IV, Tab. 1 Introduction, Appendix 7.
N.2.b.	N/A	Licensee responsibility
N.2.c.	N/A	Medical Emergency drills are the responsibilities of the licensee and the local government.
N.2.d.	*	Tab. 1, Introduction Section, II.C.4, Annex 7.
N.2.e.	*	Sec. II.B.2, Attachment 4, Tab. 1, Annex 7.
N.3.a.	*	Sec. II.A, Attachment 4, Tab. 1 Introduction, Annex 7.
N.3.b.	?	The dates, times, places for exercises and drills are not mentioned in Annex 7 or elsewhere in the plans.
N.3.c.	?	No time schedule of events is included in Annex 7 or elsewhere in the plans.
N.3.e.	?	The narrative summaries that describe the conduct of exercises listed in Sec. II.A, Tab. 1, Appendix 7 adequately cover the exercises listed. However, no exercises or drills including such things as simulated casualties, off site fire department assistance, rescue of personnel, etc. are mentioned.

- N.3.f.           ?     A description of the arrangements for and advance materials to be provided for official observers is not included in the sections covering Exercises and Drills, Sec. II.A, Tab. 1 Introduction; Appendix 7 or elsewhere in the plan.
- N.4               \*     Sec. II.A. Attachment 4, Tab. 1 Introduction, Appendix 7.
- N.5               \*     Sec. II.A, Tab. 1 Introduction and Sections XI.A and XI.D of Appendix 7.

O. Radiological Response Training Planning Standard

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

<u>Item/Location</u>		<u>Reference/Comments</u>
O.1.a.	N/A	Licensee responsibility.
O.1.b.	*	Sec. I.A, Attachment 4, Tab. 1 Introduction, Appendix 7.
O.2	N/A	Licensee responsibility.
O.3	N/A	Licensee responsibility.
O.4.a	*	Sec. I.A, Attachment 4, Tab. 1 Introduction; Appendix 7.
O.4.b.	*	Sec. I.B.3, Tab. 1 Introduction Section, Appendix 7.
O.4.c.	*	Sec. I.B.4 and I.B.5, Tab. 1 Introduction, Appendix 7.
O.4.d.	?	Cross reference for the state plan, Part I, Attachment 5 makes the Texas Engineering Extension Service responsible for training of fire fighting personnel, but not for training of police and security personnel; reference is also made to Annexes R, AA and FF which are not available as part of the plan. Relevant information from these annexes should be included in the plan or the annexes themselves

		should be included as attachments to Appendix 7 to make the radiological emergency response plan more responsive to the needs of emergency response personnel.
0.4.e.	N/A	Licensee responsibility.
0.4.f.	?	Same comment for 0.4.d. applies.
0.4.g.	?	Provisions for training of local support personnel are referenced by the cross references to the local plans. However, this item is not found in the local plans.
0.4.h.	?	The cross reference for training of medical support personnel in Sec. VIII, Annex L appears not to be responsive. Reference is made to "appropriate annexes to this plan." The same comment made in 0.4.d. above applies.
0.4.i.	N/A	Licensee responsibility.
0.4.j.	?	Annex R is referenced in the cross reference for training of personnel responsible for transmission of emergency information. The same comment for 0.4.d. applies.
0.5	?	The cross reference refers to documents that are not available as part of the basic radiological emergency response plan and is not responsive to the criteria. The same comment as for 0.4.d. applies.

P. Responsibility for the Planning Effort  
Planning Standard

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

Item/Location

Reference/Comments

P.1	*	The cross reference for training of individuals responsible for planning is given as Tab. 1, Introduction Section I.B.1. The reference should be Attachment 4-2, Sec. I.B.1 in Introduction Section of Tab. 1.
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P.2	*	Sec. XI.A, Appendix 7.
P.3	*	Section VII, A, Appendix 7.
P.4	*	Sec. XI.D, Appendix 7.
P.5	*	Sections XI.B and XI.D, Appendix 7.
P.6	*	Tab. 1, Introduction Sections III and IV.
P.7	?	Section XIII and the Procedures section of Annex 7 contain generalized statements about the status of the plan. However, no listing by title of detailed procedures for step by step implementation of the plan is included. The sections of the plan to be implemented by each procedure are not identified.
P.8	*	
P.9	N/A	Licensee responsibility.
P.10	*	Attachment 5, Appendix 7.

## Hood County, Texas

Evaluation of Radiological Emergency Response Plan  
For Comanche Peak Steam Electric Station

A. Assignment of Responsibility (Organizational Control)  
Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by state and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

<u>Location/Item</u>	<u>Reference &amp; Comment</u>
A.1.a.     ?	Page 22, Sec. VIII and page 43, Sec. III.A and B. are referenced. However, none of those sections identify Federal and private sector response organizations.
A.1.b.     *	Sec. V.A, page 6 and Sec. IV. A and B.
A.1.c.     *	Tab. 1 of Annex F, p. 52; Annex F, p. 31; Annex F, p. 39; Annex B, p. 41
A.1.d.     *	Sec. V.A, p. 6; Sec. 7, A.1, p. 7; Tab. 1, p. 52, Annex F.
A.1.e.     *	Sec. V.B.1, Annex F.
A.2.a.     *	Sec. VI.A and B, pp. 7-20; Sec. V, Annex F, pp. 46-47; Tab. 1, Annex F.
A.2.b.     *	Sec. I, p. 4.
A.3         ?	The cross reference N/A indicates that no organizations other than the local governments will have any emergency response role within the Emergency Planning Zones. However, it is conceivable that at least some assistance from state and federal agencies could be needed.
A.4         *	Sec. V.N, Annex F.

C. Emergency Response Support and Resources  
Planning Standards

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate state and local staff at the licensee's near site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

<u>Location/Item</u>		<u>Reference &amp; Comment</u>
C.1.a.	N/A	Not a NUREG criteria for local plans.
C.1.b.	N/A	Not a NUREG criteria for local plans.
C.1.c.	?	Sec. IV.D is cited in the cross reference for resources available to support Federal response. However, this section shows only the duties of the response support group and no mention is made of available resources.
C.2.a	N/A	Only the Bureau of Radiation Control will send representatives to the near site EOF. (See Tab. 1, Chap. 1, par. c of Sec. V, appendix 7 to State plan).
C.2.b.	N/A	Licensee responsibility.
C.3	N/A	State plan identifies radiological laboratories.
C.4	*	Sections III.A and III.B, Annex F. identify organizations that can be relied on for emergency assistance; but the nuclear facility should be added.

#### D. Emergency Classification System Planning Standard

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and state and local response plans call for reliance on information provided by facility licensees for determination of minimum initial off site response measures.

<u>Location/Item</u>		<u>Reference &amp; Comment</u>
D.1	N/A	Licensee responsibility
D.2	N/A	Licensee responsibility
D.3	*	Documented in Sec. VI, Annex F.
D.4	*	Sections I through VII; attachments A through R, Manual of Emergency Procedures, Annex F. Cross reference D.4 should be corrected to



include Sections I through VII, pages 53-142.

E. Notification Methods and Procedures  
Planning Standard

Procedures have been established for notification, by the licensee, of state and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

<u>Location/Item</u>		<u>Reference and Comment</u>
E.1	*	Sections I through VII and Attachments A through C, Manual of Emergency Procedures, Annex F.
E.2	*	Attachment D and Sec. II, Manual of Emergency Procedures, Annex F.
E.3	N/A	Licensee responsibility.
E.4	N/A	Licensee responsibility.
E.5	*	Attachment F, Manual of Emergency Procedures, Annex F.
E.6	*	Attachment F and Section VII, Manual of Emergency Procedures, Annex F.
E.7	*	Provisions are made in Attachment O, Manual of Emergency Procedures for written messages to the public, but samples are not included in Attachment O.

F. Emergency Communications  
Planning Standard

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

<u>Location/Item</u>		<u>Reference and Comment</u>
F.1.a.	*	Sec. V.B, Annex F.
F.1.b.	N/A	There are no contiguous state or local governments within the plume exposure pathway Emergency Planning Zone. Communications with organizations outside the plume exposure

		pathway Emergency Planning Zone is a state function and is the responsibility of the District Disaster Headquarters at Waco.
F.1.c.	N/A	Comment for F.1.b applies.
F.1.d.	*	Attachment D, Manual of Emergency Procedures, Annex F.
F.1.e.	*	Attachment E and Sec. II of the Manual of Emergency Procedures, Annex F.
F.1.f.	N/A	Licensee responsibility.
F.2	*	Attachment # and Sec. IV of the Manual of Emergency Procedures, Annex F.
F.3	N/A	Tab. 1, Appendix 7 makes the State Department of Public Safety responsible for testing communications systems.

G. Public Education and Information  
Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

<u>Location/Item</u>		<u>Reference and Comment</u>
G.1	*	Attachments F and Sec. VII, Manual of Emergency Procedures, Annex. F.
G.2	?	The cross reference cites Sec. IV.B.3, page 7 of the Hood County Emergency Operations Plan and Sec. IV, A, pages 128 and 129 as providing information for transients. However, the information contained therein is specifically for residents. These sections should also contain detailed information for transients.
G.3.a.	*	Sec. VII.B.3 and B.4, Manual of Emergency Procedures, Annex F.

G.3.b.	N/A	Licensee responsibility
G.4.a.	*	Sec. VII, III.A. and III.B Manual of Emergency Procedures, Annex F.
G.4.b.	?	The cross reference cites Sec. VII, IV.B.3 and IV B.5 for arrangements for exchange of information between spokespersons. However, these references are directed to media brief- ings.
G.4.c.	*	Sec. VIII, IV.B.7, Manual of Emergency Procedures, Annex F.
G.5	?	The cross reference cites Sec. VII, III.B but no mention is made therein of a coordinated program to be conducted at least annually to acquaint the media with the emergency response plans and information on radiation.

#### H. Emergency Facilities and Equipment Planning Standard

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

<u>Location/Item</u>		<u>Reference/Comment</u>
H.1		N/A
H.2		N/A
H.3	*	Section V, Part B of the Emergency Operations Plans, Section III, Part B of the Hood County Annex F, and Attachment B, Standard operating procedures.
H.4	*	Section I, Procedures for the Executive Group in combination with Attachment B, Standard Operating Procedure for the EOC.
H.5.a-d		N/A
H.6 a-c		N/A
H.7	?	Annex F, Section V.M states that the Radiological Defense Officer will provide assistance as requested to the Texas Department of Health if resources are available. This does not address the

Attachment H-22

requirements of NUREG 0654-H.7 that each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility. Section VII, Part B of the state plan described the assignment of accident assessment responsibilities. The state appears to have adequate equipment and personnel to determine the magnitude of the emergency, and to provide monitoring of the radioactivity. The county should state what equipment, if any, is available to measure whole body gamma exposures and airborne radioiodine concentrations. A plan for transmitting these data, if any, to the EOF should be included.

H.8		N/A
H.9		N/A
H.10	?	See comment for H.7 above.
H.11	?	See comment for H.7 above.
H.12	?	See comment for H.7 above.

I. Accident Assessment Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comment</u>
I.1	N/A
I.2	N/A
I.3	N/A
I.4	N/A
I.5	N/A
I.6	N/A
I.7	? Hood County Annex F, Section V.M does not address I.7 which requires that "Each organization shall describe the capability and resources for field monitoring within the

## Attachment H-23

plume exposure EPZ which are intrinsic parts of the concept of operations for the facility." If the county is not depended upon to supply radiological data to the state and to the utility for use in assessing the magnitude of the emergency, the plan should so state.

I.8	?	See comment for I.7
I.9		N/A
I.10		N/A
I.11		N/A

J. Protective Response  
Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>Location/Item</u>	<u>Reference/Comment</u>
J.1	N/A
J.2	?
	This is not addressed. The utility is primarily responsible for this but cooperative arrangements for sheltering, decontamination, medical attention, etc. are needed.
J.3	N/A
J.4	N/A
J.5	N/A
J.6	N/A
J.7	N/A
J.8	N/A
J.9	?
	Attachment K to the Hood County plan for Emergency Husbandry Procedures addresses the problem of contamination of human and animal foods in an adequate manner. Gamma ray and radio iodine exposures directly from the

the airborne plume are not adequately addressed. The response indicated in the procedures for the Executive Group is one of ordering evacuation or sheltering when recommended by the state or by the utility. If this is the case the cross-reference for J.9 should include a reference to Section I - The Executive Group Procedures.

- J.10.a. \* Attachment G, Evacuation Procedures
- J.10.b. \* See J.10.a.
- J.10.c. \* Attachment F, Warning.
- J.10.d. \* Attachment G, Evacuation Procedures.  
Tab. 2 - Section II.C.3.
- J.10.e. \* Annex F, Section V, Paragraph L.3.
- J.10.f. \* See J.10.e.
- J.10.g. \* See J.10.d.
- J.10.h. \* Attachment H - Sheltering.
- J.10.i. \* Attachment G.
- J.10.j. \* This is adequately addressed in the plan.  
The cross-reference should include a reference to Manual of Emergency Procedures Section II.
- J.10.k. \* Attachment G, Section IV, Tab 2, to Annex F.
- J.10.l. \* Attachment G, Section IV, Tab 2, to Annex F.
- J.10.m. N/A
- J.11 N/A
- J.12 \* Attachment H - Standard operating procedures for sheltering evacuees.

K. Radiological Exposure Control  
Planning Standard

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protection Action Guides.

<u>Location/Item</u>	<u>Reference/Comment</u>
K.1	N/A

K.2

N/A

K.3.a. ?

Hood County Annex F Section V M states that exposure control is the function of the Texas Department of Health but that the county RDO will assist as requested if resources are available. Attachment G - Evacuation - Tab. 3 lists the contents of the list for roadblock personnel. Only a TLD is to be furnished. NUREG 0654-K3 requires both self reading (e.g., pocket ion dosimeter) and permanent record dosimeters (e.g., TLD). In addition the self reading devices must have appropriate sensitivities to permit meeting NUREG-0654, K4. Each emergency worker should be provided a sensitive direct reading dosimeter (e.g., 0-200 m Rem) plus a higher range direct reading dosimeter (e.g., 0-20 Rem) plus a permanent record device (e.g., TLD or film badge). Improvements in the plan are needed to insure the availability and proper distributions of appropriate dosimeters. Section VII-B-7 of Appendix 7 to Annex L of the state plan (contamination control) implies that all workers entering a contaminated area will have dosimeters but the number available, the source of supply, etc., is not detailed.

K.3.b. ?

Dose record forms need to be included in the plan and need to be distributed to emergency workers. In addition, requirements need to be developed for frequent reading and timely reporting of doses to the EOCs by the emergency workers.

K.4 ?

The procedure for authorization of emergency workers to incur exposures in excess of PAGs needs to be clearly stated in the county plan. This should clearly name the official who is

able to authorize this action. The procedure should also clearly require that the decision take into account the exposure data from K.3.a. and K.3.b. above.

K.5.a. ? The Attachment H - Shelter; Monitoring and Precontamination Procedures of the Hood County plan does not specify action levels for decontamination. The Tab 1, Chapter 1, Procedure 5, Part VI does specify action levels for initiating decontamination.

K.5.b. ? Sections VII.B.8 of Appendix 7 to Annex L of the state plan states that the Bureau of Radiation Protection will advise the local officials in decontamination actions, that are to be conducted in accordance with "NCRP Report No. 65." No procedures for the disposal of wastes was found. No procedures were found in the Hood County plan for waste disposal. NCRP Report No. 65 should be made a part of the plan if it is the appropriate procedure to be followed.

K.6 N/A

K.7 N/A

L. Medical and Public Health Support  
Planning Standard

Arrangements are made for medical services for contaminated, injured individuals.

Location/Item

Reference/Comment

L.1 ? Provisions are made in Attachment Q, Manual of Emergency Operations for listing hospitals. However, the list is not developed. When added, this section should list other medical facilities for backup and should state the capabilities for evaluating and treating radiological exposure injuries.



- L.2 N/A Licensee responsibility.
- L.3 N/A Applies to state only.
- L.4 \* Sec. VI.B.4 of the County Emergency Operations Plan makes the Hood County Fire Chief and the Fire Chief and Marshalls of the cities responsible for transportation of radiological accident victims.

M. Recovery and Reentry Planning and Post-accident Operations Planning Standard

General plans for recovery and reentry are developed.

<u>Location/Item</u>	<u>Reference/Comments</u>
M.1 ?	Section III.R, Manual of Emergency Procedures, Annex 7 states that "details and criteria for recovery and reentry "will be provided by the Texas Department of Health." However, there is no evidence in the plan that general plans and procedures have been developed.
M.2 N/A	Licensee responsibility.
M.3 N/A	State responsibility.
M.4 N/A	State responsibility.

N. Exercises and Drills Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

<u>Location/Item</u>	<u>Reference/Comment</u>
N. ?	The cross reference cites the utility emergency plan, but the state plan makes some of the exercises and drills the responsibility of the utility, the Bureau of Emergency Management, and the Bureau of Radiation Control There is no evidence in the local plan that local organizations receive training or participate in exercises and drills or that training programs for local emergency response personnel

Hood County, Texas

have been developed. These comments apply to each item in this NUREG-0654 section.

O. Radiological Emergency Response Training Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comment</u>
N ?	Comment for N, Exercises and Drills, above applies.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comment</u>
P.1 *	Hood County Emergency Operations Plan Sec. VI.3.e.p.8.
P.2 *	Hood County Emergency Operations Plan Sec. VI.3.d.p.8.
P.3 *	Hood County Emergency Operations Plan Sec. VI, 3, p.8.
P.4 *	Hood County Emergency Operations Plan Sec. XI, p.23.
P.5 ?	The cross reference is marked N/A. The state plan, Sections XI.B and XI.D, Annex 7 addresses only state plans and changes. Provisions should be made for forwarding local plans and changes to all responsible emergency response personnel.
P.6 ?	Supporting plans and their sources are not listed for the local plans. The cross-reference is marked N/A. The listing of supporting plans found in Tab. 1, Introduction Sections III and IV, Annex 7, state plan pertains only to supporting plans for the state.

- P.7        \*        Annex A, Sec. VII; Manual of Emergency Procedures, Annex 7.
- P.8        \*        Table of Contents and Cross References are included.
- P.9        N/A        Licensee responsibility.
- P.10       ?        The cross reference indicates that provisions for updating telephone numbers are in the utility emergency response plan. They should also be included in the local plans.

Sommervell County, Texas  
 Evaluation of Radiological Emergency Response Plan  
 For Comanche Peak Steam Electric Station

A. Assignment of Responsibility (Organizational Control)  
 Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by state and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

<u>Location/Item</u>		<u>Reference/Comments</u>
A.1.a.	?	Page 20, Sec. VIII and page 43, Sec. III.A and B. are referenced. However, none of those sections identify Federal and private sector response organizations.
A.1.b.	*	Sec. V.A, page 6 and Sec. IV.A and B, page 44.
A.1.c.	*	Tab. 1 of Annex F, p. 51; Annex F, p. 31; Annex F, p. 39; Annex B, p. 41.
A.1.d.	*	Sec. V.A, p. 6; Sec. 7, A.1, p.7; Tab. 1, p. 51.
A.1.e.	*	Sec. V.B.1, Annex 7.
A.2.a.	*	Sec. VI.A and B, pp. 7 - 17; Sec. V, Annex F, pp. 45-48; Tab. 1, Annex F.
A.2.b.	*	Sec. I, p. 4; Attachment 2/1, p. 23.
A.3	?	The cross reference N/A indicates that no organizations other than the local governments will have any emergency response role within the Emergency Planning Zones. However, it is conceivable that at least some assistance from state and federal agencies could be needed.
A. 4	*	Sec. V.N, Annex F.

C. Emergency Response Support and Resources  
Planning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate state and local staff at the licensee's near site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

<u>Location/Item</u>		<u>Reference/Comments</u>
C.1.a.	N/A	Not a NUREG criteria for local plans.
C.1.b.	N/A	Not a NUREG criteria for local plans.
C.1.c.	?	Page 138, Sec. IV.D, Attachment B, Manual of Emergency Procedures, Annex F, is cited in the cross reference for resources available to support Federal response. However, this section shows only the duties of the response support group and no mention is made of available resources.
C.2.a.	N/A	Only the Bureau of Radiation Control will send representatives to the near site EOF. (See Tab. 1, Chap. 1, par. C of Sec. V, Appendix 7 to State plan).
C.2.b.	N/A	Licensee responsibility.
C.3	N/A	State plan identifies radiological laboratories.
C.4	*	Sections III.A and III.B, Annex F, identify organizations that can be relied on for emergency assistance; but the nuclear facility is not included.

D. Emergency Classification System  
Planning Standard

A standard emergency classification and action level scheme, the basis of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and state and local response plans call for reliance on information provided by facility licensees for determination of minimum initial off site response measures.

<u>Location/Item</u>		<u>Reference/Comments</u>
D.1	N/A	Licensee responsibility

D.2	N/A	Licensee responsibility
D.3	*	Documented in Sec. VI, Annex F.
D.4	*	Sections I through VII; Attachments A through R, Manual of Emergency Procedures, Annex F. Cross reference D.4 should be corrected to include Sections I through VII, pages 55 - 130.

E. Notification Methods and Procedures  
Planning Standard

Procedures have been established for notification, by the licensee, of state and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

<u>Location/Item</u>		<u>Reference/Comments</u>
E.1	*	Sections I through VI and Attachment A through D, Manual of Emergency Procedures, Annex F.
E.2	*	Attachment D, and Sec. II, Manual of Emergency Procedures, Annex F.
E.3	N/A	Licensee responsibility.
E.4	N/A	Licensee responsibility.
E.5	*	Attachment F. Manual of Emergency Procedures, Annex F.
E.6	*	Attachment F, and Sec. VI, Manual of Emergency Procedures.
E.7	*	Provisions are made in Attachment O, Manual of Emergency Procedures for written messages to the public, but samples are not included in Attachment O.

F. Emergency Communications  
Planning Standard

Provisions exist for prompt communications among principal response

organizations to emergency personnel and to the public.

<u>Location/Item</u>		<u>Reference/Comment</u>
F.1.a.	*	Sec. V.B, Annex F.
F.1.b.	N/A	There are no contiguous state or local governments within the plume exposure pathway Emergency Planning Zone. Communications with organizations outside the plume exposure pathway Emergency Planning Zone is a state function and is the responsibility of the District Disaster Headquarters at Waco.
F.1.c.	N/A	Comment for F.1.b. applies.
F.1.d.	*	Attachment D, Manual of Emergency Procedures, Annex F.
F.1.e.	*	Attachment D and Sec. II of the Manual of Emergency Procedures, Annex F.
F.1.f.	N/A	Licensee responsibility.
F.2	*	Attachment E and Sec. IV of the Manual of Emergency Procedures, Annex F.
F.3	N/A	Tab. 1, Appendix 7 makes the State Department of Public Safety responsible for testing communications systems.

G. Public Education and Information  
Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

<u>Location/Item</u>		<u>Reference/Comments</u>
G.1	*	Attachments F and Sec. VII, Manual of Emergency Procedures, Annex. F.

- G.2 ? The cross reference cites the Manual of Emergency Procedures, Sec. IV, Part IV, A, pages 118 and 119 as providing information for transients. However, the information contained therein is specifically for residents. These sections should also contain detailed information for transients.
- G.3.a. \* Sec. VI.B.3 and B.4, Manual of Emergency Procedures, Annex F, page 119.
- G.3.b. N/A Licensee responsibility.
- G.4.a. \* Sec. VI, III.A. and III.B. Manual of Emergency Procedures, Annex F.
- G.4.b. ? Sec. VI, IV.B.3 and IV.B.5, p. 119.
- G.4.c. \* Sec. VI, IV.B.7, Manual of Emergency Procedures, Annex F.
- G.5 ? The cross reference cites Sec. VI, III.B. but no mention is made therein of a coordinated program to be conducted at least annually to acquaint the media with the emergency response plans and information on radiation.

#### H. Emergency Facilities and Equipment Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided:

<u>Location/Item</u>	<u>Reference/Comments</u>
H.1 .	N/A
H.2 .	N/A
H.3 *	Section V Part B of the Emergency Operating Plan; Section IV Part B of Sommervell County, Annex F; and Attachment B, Standard Operating Procedures for the EOC.
H.5 a-d	N/A
H.6 a-c	N/A
H.7 ?	Sommervell [County Annex F Section V M states that the Radiological Defense Officer will



provide assistance as requested to the Texas Department of Health if resources are available. This does not address the requirements of NUREG-0654-H.7 that "Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility." Section VII Part B of the State Plan describes the assignment of accident assessment responsibilities. The state appears to have adequate equipment and personnel to determine the magnitude of the emergency and to provide monitoring of the radioactivity. The county should state what instruments if any are available to measure whole body gamma exposures and airborne radio iodine concentrations. A plan for transmitting these data, if any, to the EOF should be included.

H.8		N/A
H.9		N/A
H.10	?	See H.7 above.
H.11	?	See H.7 above.
H.12	?	See H.7 above.

#### I. Accident Assessment Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comments</u>
I.1	N/A
I.2	N/A
I.3	N/A
I.4	N/A
I.5	N/A

I.6		N/A
I.7	?	Sommervell County Annex F, Section V.M does not address I.7 which requires that "Each organization shall describe the capability and resources for field monitoring within the plume exposure EPZ which are an intrinsic part of the concept of operations for the facility." If the county is not depended upon to supply radiological data to the state and to the utility for use in assessing the magnitude of the emergency, the plan should so state.
I.8	?	See comment for I.7.
I.9		N/A
I.10		N/A
I.11		N/A

J. Protective Response  
Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>Location/Item</u>		<u>Reference/Comments</u>
J.1		N/A
J.2	?	This is not addressed. The utility is primarily responsible for this requirement but cooperative arrangements for sheltering, decontamination, medical treatment, etc. are needed.
J.3		N/A
J.4		N/A
J.5		N/A
J.6		N/A

- J.7 N/A
- J.8 N/A
- J.9 ? Attachment K to the Sommervell County plan is cited in the cross reference. This attachment addresses Emergency Husbandry Procedures in an adequate manner, but Gamma ray exposure and radioiodine exposures directly from the airborne plume are not adequately addressed. The response indicated in the procedures for the Executive Group is one of ordering evacuation or sheltering when recommended by the State or by the Utility. If this is the case, the cross reference should include a reference to Section I - The Executive Group Procedures.
- J.10.a. \* Attachment G, Evaluation Procedures.
- J.10.b. \* See J.10.a.
- J.10.c. \* Attachment F, warning.
- J.10.d. \* Attachment G, Evacuation Procedures Tab. 2, Section II C 3.
- J.10.e. \* Sommervell County Annex F, Section V 4 state that the RDO will assist the State Department of Health in administering radioprotective drugs if requested.
- J.10.f. \* See comment for J.10.e.
- J.10.g. \* See comment for J.10.d.
- J.10.h. \* Attachment H - Shelter - Describes location and procedures.
- J.10.i. \* Attachment G - Evacuation Procedures.
- J.10.j. \* This is adequately addressed in the plan. The cross reference should include a reference

to the Manual of Emergency Procedures -  
Section II.

- |         |   |   |
|---------|---|---|
| J.10.k. | * | Possible impediments to evacuation (e.g. ice on roads) is addressed in the evacuation plan, Attachment G.                                   |
| J.10.l. | * | The evacuation plan, Attachment G, includes analyses of times required for evacuating each sector under each of several weather conditions. |
| J.10.m. | * | N/A   |
| J.11    |   | N/A   |
| J.12    | * | Attachment H - Standard Operating Procedures for Sheltering Evacuees.   |

#### K. Radiological Exposure Control Planning Standard

Means for controlling radiological exposure, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

<u>Location/Item</u>	<u>Reference/Comments</u>
K.1	N/A
K.2	N/A
K.3	? Sommervell County Annex F Section V M states that exposure control is the function of the Texas Department of Health but that the county RDO will assist as requested if resources are available. Attachment G Evacuation - Tab. 3 lists the contents of the kit for roadblock personnel. Only a TLD is to be furnished. NUREG-0654-K3 requires both self reading (e.g. pocket ion chamber) and a permanent record dosimeter (e.g. TLD). In addition, the self

reading devices must have appropriate sensitivities to permit meeting NUREG 0654-K4. Each emergency worker should be provided a sensitive direct reading dosimeter (e.g. 0 - 20 m Rem) plus a higher range direct reading dosimeter (e.g. 0 - 20 Rem) plus a permanent record device (e.g. TLD or film badge). Improvements in the plan are needed to insure the availability and proper distribution of appropriate dosimeters. Section VII-B-7 of Appendix 7 to Annex L of the State Plan (Contamination Control) implies that all workers entering a contaminated area will have dosimeters but the number available, the source of supply, etc., is not detailed.

K.3.b. ?

Dose record forms need to be included in the plan and need to be distributed to emergency workers. In addition, requirements need to be developed to insure timely readings and timely reporting of doses to the EOCs by the emergency workers.

K.4 ?

The procedure for authorizing emergency workers to incur exposures in excess of PAGs needs to be clearly stated in the county plan. This should clearly name the official who is able to authorize this action. The procedure should also clearly require that the decision take into account the exposure data from K.3.a and K.3.b above.

K.5.a. ?

The Attachment H - Shelter - Monitoring and Decontamination Procedures for the Sommervell county plan does not specify action levels for decontamination. Section VII B-7 of the State Plan - Contamination

Control - does not specify action levels for decontamination.

K.5.b. ?

Section VII B 8 of Appendix 7 to Annex L of the State Plan specifies that the Bureau of Radiation Protection will advise the local officials in decontamination actions that are to be conducted in accordance with "NCRP report No. 65." No procedure for the disposal of contaminated wastes was found. No procedure was found in the Somervell county plan for waste disposal. "NCRP Report No. 65" should be made a part of the plan if it is the appropriate procedure to be followed.

L. Medical and Public Health Support Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

<u>Location/Item</u>		<u>Reference/Comments</u>
L.1	?	Provisions are made in Attachment Q, Manual of Emergency Operations for listing hospitals. However, the list is not developed. When added, this section should list other medical facilities for back up and should state the capabilities for evaluating and treating radiological exposure injuries.
L.2	N/A	Licensee responsibility.
L.3	N/A	Applies to state only.
L.4	*	Sec. VI.B.4 of the State Emergency Operations Plan.

M. Recovery and Reentry Planning and Post-accident Operations Planning Standard

General plans for recovery and reentry are developed.

<u>Location/Item</u>		<u>Reference/Comments</u>
M.1	?	Section I, Par III S, page 69, Manual of

Emergency Procedures, Annex F, states that details and criteria for recovery and reentry "will be provided by the Texas Department of Health." However, there is no evidence in the plan that general plans and procedures have been developed.

M.2	N/A	Licensee responsibility.
M.3	*	Sec. 3, Par. III L, p. 94. This should be added to the cross reference.
M.4	N/A	State responsibility only. Reference to appropriate section of state plan.

N. Exercises and Drills  
Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Location/Item

Reference/Comments

N.	?	The cross reference cites the utility emergency plan, but the state plan makes some of the exercises and drills the responsibility of the utility, the Bureau of Emergency Management and the Bureau of Radiation Control. There is no evidence in the local plan that local organizations receive training or participate in exercises and drills or that training programs for local emergency response personnel have been developed. These comments apply to each item in this NUREG-0654 section.
----	---	--

O. Radiological Emergency Response Training  
Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comments</u>
0 ?	Comment for N, Exercises and Drills, above applies.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans  
Planning Standard

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

<u>Location/Item</u>	<u>Reference/Comments</u>
P.1 *	Sommervell County Emergency Operations Plan Sec. VI.2.g, p. 8.
P.2 *	Sommervell County Emergency Operations Plan Sec. VI.2.d, p. 8.
P.3 *	Sommervell County Emergency Operations Plan Sec. VI, 2, p. 8.
P.4 *	Sommervell County Emergency Operations Plan Sec. XI. p. 23.
P.5 ?	The cross reference is marked N/A. The state plan, Sections XI.B and XI.D, Annex 7 addresses only state plans and changes. Provisions should be made for forwarding local plans and changes to all responsible emergency response personnel.
P.6 ?	Supporting plans and their sources are not listed for the local plans. The cross reference is marked N/A. The listing of supporting plans found in Tab. 1, Introduction Sections III and IV, Annex 7, state plan pertains only to supporting plans for the state.
P.7 *	Annex A, Sec. VI, Manual of Emergency Procedures, Annex 7, p. 132.
P.8 *	
P.9 N/A	Licensee responsibility.



P.10

?

The cross reference indicates that provisions for updating telephone numbers are in the utility emergency response plan. They should also be included in the local plans.

Hood/Somervell Co. REP Plans  
Organization

Basic Plan - (2 attachments - organization - court order)

- Annex A - Warning
- Annex B - Communications
- Annex C - Shelter Plan (Not included)
- Annex D - Radiological defense plan (not included)
- Annex E - Crisis Relocation Plan (not included)
- Annex F - Fixed Nuclear Facility Response Plan

Manual of Emergency Procedures (SOP) for Incidents involving the CPSES

(called an addendum to county EOP)

(called an extension of Annex F)

- Section I - Procedures for Executive Group
- Section II - Procedures for Law Enforcement
- Section III - Procedures for Fire & Rescue
- Section IV - Procedures for Hospital/Medical
- Section V - Procedures for Shelter & Transportation
- Section VI - Public Information
- Section VII - Attachments

Attachments

- A. Initial Notification
  - B. EOC
  - C. Verification
  - D. Notification/Communications
  - E. Call List
  - F. Warning
  - G. Evacuation
  - H. Shelter
  - J. Transportation
  - K. Husbandry
  - L. Media
  - M. Government Agencies
  - N. Situation Form
  - O. Protective Measures
  - P. Emergency Actions (PIO)
  - Q. Medical Facilities
  - R. State Disaster Act
- (Attachments above have tabs)

GENERAL COMMENT:

Plan needs to be tabulated for quick reference. Page numbering is inconsistent for base plan. Plan organization is confusing. Either should be two separate plans or organization for 1 plan consistent throughout (eg. 1 warning annex and 1 set of attachments for entire plan).

HOOD/SOMERVELL COUNTY EMERGENCY PLANS

NUREG 0654  
ELEMENT

A. ASSIGNMENT OF RESPONSIBILITY

- 1.a. Plans indicate procedures for requesting support from State, Federal or military. Identified at the local level is Hood County and the incorporated cities of Granbury, Tipan and Tolar; and Somervell County and the city of Glen Rose. The Division of Occupational Health and Radiation Control will assist counties with planning and operations relating to fixed nuclear incident.

Okay

- b. County Judge and Mayors of incorporated towns are responsible for emergency measures including requests for assistance. Department/agency responsibilities summarized.

Okay

- c. Primary and support responsibilities of agencies shown in diagram p. 51 (Somervell) P. 52 (Hood)

Okay

- d. County Judge has responsibility for emergency response in the County including unincorporated communities. The mayors of incorporated towns/cities have responsibility in towns/cities. Each city/county agency has director/chief who is responsible for that agency.

Okay

- e. The Sheriff's Office is responsible for 24-hour manning of communications link and warning-technical response by State. Other response (fire, law enforcement, etc.) normal.

Okay

- 2.a. Executive group (mayor/council members and County Judge/Commissioners) represent command and control. A & N, Communications - Sheriff - all major elements addressed - Functional agency responsibility chart included p.51, (Somervell) and p. 52,(Hood).

Okay

- b. Legal basis.

Okay

3. Local plans' cross-reference indicates this element is not applicable. American Red Cross is covered by State, however, local volunteer organizations if they are to be used should have letters or agreements as to what with and how they will respond/assist local governments. School busses are to be used. If these are fiscally independent school districts and busses are either owned by the district or are contract busses and are to be used to evacuate people, letters of agreement may be appropriate. I feel local plans should address this element if any resources are to be used other than those committed by law.

4. County Judges and Mayors of incorporated towns will assure continuity of operations in their respective jurisdictions.

Okay

B. ONSITE EMERGENCY ORGANIZATION

2. While not designated as an element to be addressed in local plans, local governments may wish to include the title of the person from the licensees' facility who is responsible for initiating emergency actions and providing recommendations for protective actions to offsite officials.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

1.a. Cross reference indicates N/A. Base plan VI, A.1.d. and VIII, indicates County Judges or Mayors may request State, Federal of military assistance through State Disaster Districts. Can local government request Federal or military assistance directly? If so, it should be indicated and the proper procedures for doing so.

Not FEMA assigned element

2.a. Cross reference indicates this element N/A. Plan should designate local official to serve as representative of local government at the EOF. This doesn't mean a representative must be there; only that a representative may be there if he/she so chooses.

4. Local government relies heavily upon State assistance for technical capabilities. Local resources other than schools and local government not addressed. Letters of agreement with school districts may be appropriate unless school resources have been committed previously through legal instruments.

D. EMERGENCY CLASSIFICATION SYSTEM

3. Incidents occurring at Comanche Peak have been classified consistent with NUREG-0654 criteria and assumedly that of Utility facility operator.
4. Emergency classification system listed and increased readiness action given in basic plan. Lengthy "Manual of Emergency Procedure for Incidents involving the Comanche Peak Steam Electric Station" is included as an addendum to the plan and appears to cover procedures to be employed by various entities consistent with the emergency action level.

E. NOTIFICATION METHODS AND PROCEDURES

1. Procedures for verification are found on pp. 147 and 148. Proper response by organizational entity noted.
2. Page 71 gives procedures for notifying response organizations for unusual event. Similar procedures for all action levels given.
3. Cross reference indicates 'N/A', however, feel this element should be addressed by S and L. I do not find copy of initial emergency message or any indication that local government is aware of the contents of such a message (See p. 156, warning message "similar to")
5. P. 156 addresses type information which might be broadcast to the public in the event of an accident/incident at Comanche Peak.
6. Siren coverage on P. 40 appears to provide notification to the public. Means for providing instructions to the public by EBS or mobile PA units (pp. 157-162)
- E.7. Pp. 227-231 gives sample message format for press for protective measures and evacuation procedures.

F. EMERGENCY COMMUNICATIONS

- 1.a. P.45 indicates sheriff's office to maintain 24 hour per day communications capability. Capability consists of telephone and radio with DPS (currently not with utility).
- b. N/A according to cross-reference however, it should be indicated what provisions are made for communications with contiguous local (county) governments within 50 mile ingestion pathway. (eg. through DPS District Office, Waco).

- c. Cross reference N/A. State responsibility (See comment C.1a.)
- d. Communications from utility is apparently only through DPS District Office to local government at this time. Radiological monitoring teams and communications between teams and local EOC or utility's EOC not addressed at local level. (State responsibility for monitor team communication)

Okay

- e. Plans have sufficient provisions and procedures for alerting emergency response personnel.
- 2. Plans indicate N/A as does State REP Plans. Local plans should address this element. (Capability to communicate between ambulance/hospital)

G. PUBLIC EDUCATION AND INFORMATION

- 1.a. Public education and information is generally well-addressed.
- b. I question the need to distribute the information package annually to each residence. (IV.A.2,p.118) as changes occur or bi-annually would seem more feasible. (Criteria says info will be distributed annually, not necessarily the same info package as the plans imply) The plans also indicate public meetings will be held annually. This is not required but is certainly okay if it is desired by local government.
- c.
- d.
- 2. The resident populace appears to be well covered regarding public education and information. I do not find provisions for assuring the transient populace has access to such information. Placing signs in public places, hotels, motels, stores, P.O's, etc. and publishing of info in telephone directories would be some ways of making the information available to the transient populace.
- 3.a. The Waco District DPS office is noted as the point of contact for the media briefings schedule. The utility's operations facility (EOF) is designated as the site for the city and county news media. The alternate for the city/county will be the commissioners courtroom.
- 4.a. The chief executive of the County (Judge) and the Cities (Mayors) will be spokespersons for their jurisdictions (or their appointed representative)

- b. Press briefings will be scheduled and conducted for all news media at which time any exchange of information will occur.
- c. The cross reference indicates the county and city will discourage independent news dissemination to the press; this may discourage some rumors, however, there will no doubt be some rumors and unsubstantiated info passed in the event of an accident/incident at CPSES. There should be a telephone number to call or a central location where one can go for factual information and where rumors can be verified or corrected.
5. I do not find specific provisions for programs to acquaint the news media with plans, radiation and points of contact on an annual basis. The plans should provide for this.
- H. EMERGENCY FACILITIES AND EQUIPMENT
3. Both counties have established EOC's (Somervell Co. has alternate EOC also).
4. Activation and staffing of EOCs addressed satisfactorily.
7. State Health Department is primarily responsible for monitoring but County RDO will provide assistance if resources are available.
11. Primarily responsibility of State Health Department.
- I. ACCIDENT ASSESSMENT  
(No FEMA assigned element review)
- J. PROTECTIVE RESPONSE
- 10.a. Maps showing evacuation routes are included but I do not find maps of evacuation areas as such. There is a general lack of precise evacuation procedures in the plans. I assume instructions and procedures including areas to be evacuated will be included in the public information package. Radiological sampling and monitoring points are included in State Plan. I do not find maps of shelter or relocation areas. These may not be needed due to common knowledge of area by all and the low evacuee population. Plans should so state if this is true.

- b. Segmented population totals shown on p. 192.  
Okay
- c. Outdoor warning devices to cover entire 10 EPZ. How to locate and warn hard-of-hearing or deaf?
- d. Institutionalized persons compensated for: No mention of hard-of-hearing or handicapped persons not institutionalized.
- f. Decision is State's - County may assist in administration of KI if requested.
- g. Means of relocation is primarily by auto (or school busses if during school). Assumes what few residents who do not have autos, have access to rides with friends, neighbors or relatives. Plans should identify such persons and assure they will be evacuated.
- h. Shelter facilities should be outside the 10 mile EPZ (Glen Rose Senior High is listed as shelter facility)
- i. Projected traffic capacities of roads are cited and supporting studies referenced.
- j. County Sheriff is responsible for control points for evacuation (p. 47) and Tab G. VI indicates control will be maintained over access to evacuated area (cross reference should indicate appropriate procedures which address this element).
- k. The only impediments (highway) noted would be icing or roadways.  
Okay
- l. Table 2 - misspelled word. "Area" section is upside down. Summary of evacuation time analysis appears viable considering population.
12. Shelter registration form included in plan as Tab 2 to attachment H. Decontamination procedures seem reasonable. (Where does the temporary clothing come from if individual's clothing is contaminated?)
- Not  
FEMA
- K. RADIOLOGICAL EXPOSURE CONTROL
- 3.a. State responsibility primarily - County RDO may assist.  
Okay



4. State responsibility primarily - County RDO may assist.

Okay

L. MEDICAL AND PUBLIC HEALTH SUPPORT

3. Cross reference indicates N/A. State plan implies some local responsibility. Letters of agreement may be appropriate to assure a willingness and capability to accept radioactively contaminated individuals. How many R.C. patients can hospitals accommodate? Do they have capability to monitor?
4. Cross reference indicates p. 3 item f. of plan. This merely indicates the Sheriff's Office has the responsibility to dispatch ambulances. Is this private ambulance service? Does utility have medical transfer capability? If private ambulance service, are personnel trained in handling R.C. patients? How many ambulances are available?

M. RECOVERY AND REENTRY PLANNING AND POST ACCIDENT OPERATIONS

1. Plan indicates procedures and information regarding recovery and reentry will be provided by State Health. State plan does not address details of recovery and reentry such as time phased movement, etc. This decision to be made based on time and circumstance of occurrence?

N. EXERCISES AND DRILLS

- 1.a. Exercising, scenario development and drills are primarily  
b. responsibility of State and Utility according to plan;
- 2.a. however, local plans should address willingness of local  
b. governments to participate in exercises and drills noted  
and with the frequency recommended by NUREG-0654.  
(note communication, medical drills required for locals)
- 3.a. All same as above - Local government plans should indicate  
b. its willingness to participate and support where necessary  
c. all elements noted that are related to and appropriate for  
e. local government.  
f.
4. Same as above.
5. Same as above.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

1.b. Local plans should indicate they will participate in appropriate training. If mutual aid pacts or reciprocal agreements exist between governmental entities, like training will be made available to them.

4.a. Same as above. Those organizations listed should indicate their intent to participate in the necessary training to qualify them for response to an accident/incident at CPSES.  
 b.  
 d.  
 f.  
 g.  
 h.  
 j.

5. Same as above.

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

1. The Emergency Management Director/Coordinator is assigned responsibility for the planning effort. Plan doesn't say that person will be trained but must be assumed he has planning on experience and training to qualify him for the position.

2. Emergency Management Coordinator/Director designated.

3. Emergency Management Coordinator/Director (who is the County Judge or his appointee) is responsible for emergency plans preparation, review, revision and coordination with other plans.

4. Plan will be reviewed each six months and revised or updated annually. While not mentioned specifically, mentions it is assumed this review and update process would consider any comments made as a result of exercise.

5. Cross reference indicates N/A. Plans should contain a distribution list of plan and indicate changes to plan will be dated and marked appropriately.

6. Cross reference indicates N/A. Supporting plans and authority for plan are found on p. 2 as II and I respectively.

7. Listing of implementing procedures found on p. 132 (Somervell Co.) and p. 142 (Hood Co.)

8. Table of Contents and Cross Reference are contained in plan. Suggest that plan organization and addenda be better defined and tabbed for easy reference.

10.

While telephone numbers should not be a part of the plan, the plan should contain provisions for updating these numbers on a quarterly basis as outlined in 0654.

## Memorandum

Date July 21, 1982

From Tom Carroll, Public Health Advisor  
Region VI

Subject Review of State and Local Policies for Command ~~the~~ Peak

To O. L. Lookabaugh, Chairman  
F.E.M.A. VI Regional Assistance Committee

A. Assignment of Responsibility

1-A thru C - Addressed in Annex L - State Plan

2-A - State Plan Annex L - very generally stated. Evidently the individual Bureaus and Divisions have their specific policies and procedures under which they function. This material had not been made available to the Reviewer.

L - Medical and Public Health Support.

Annex L, Page 28 - State Plan

This again relates to specific operational plans and procedures to be provided by the Bureau of Emergency Management. This material has not been made available to the Reviewer. Can not evaluate.

Local Plans

Hood County

1-A - Assignment of Responsibilities  
Health and Medical, Pages 14 & 15  
Section should be tabled.

1-B - Described in Section IV & V (should be tabled).

1-C - Tab #1, Page 052

1-D - Section IV & V

1-E - Section IV & V

2-A - Section IV & V

2-B - No Comment

3 - N/A

Page 2 - O. L. Lookabaugh

4. Could not find

L - Medical and Public Health Support

1 - No mention of back-up support unless it is contained in Hospital Plan.

2 - No mention of transporting victims.

Somervell County - Do not understand numbering sequence of plan especially using the cross-reference.

Same as Hood County in organization and content.

REVIEW OF STATE & LOCAL PLANS FOR CONTINGENCY PLANS  
CONSOLIDATED DOT COMMENTS

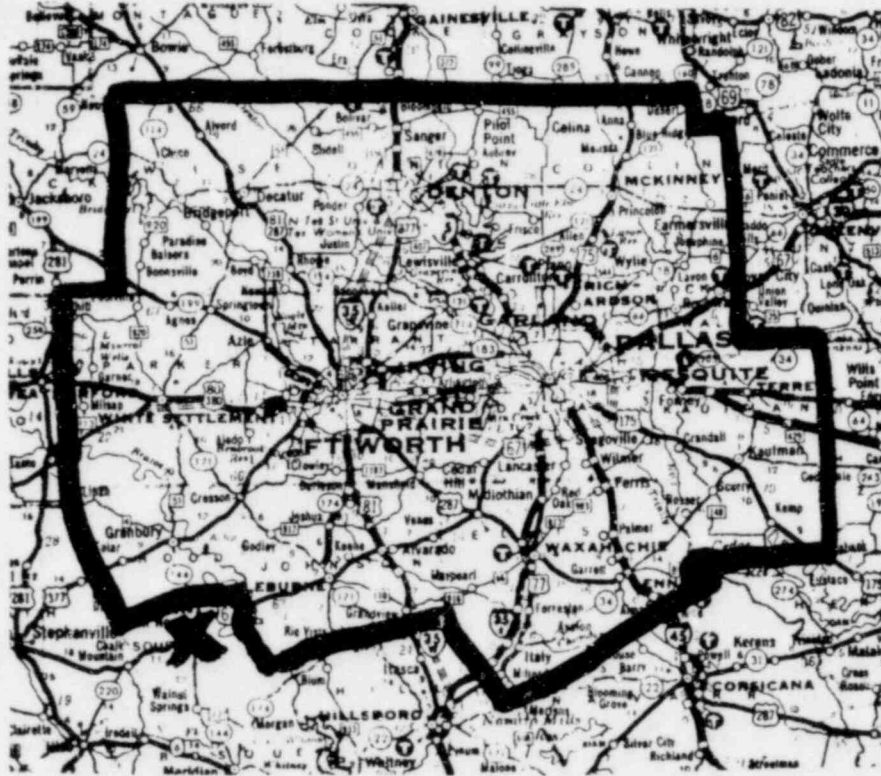
invol All DOT assigned standards were considered satisfied except as noted below.

E.G. I did not find a figure showing the time required for notifying and informing the public.

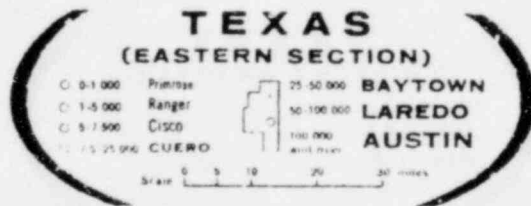
10.a. There was no map showing relocation centers in host areas or shelter areas. These might be included in the Crisis Relocation Plan. This should be verified.

10.g. Attachment J, Transportation Resources needs to be completed.

10.h. Not shown in local plans. Presume these are included in Crisis Relocation Plan.



= Comanche Peak nuclear power plant



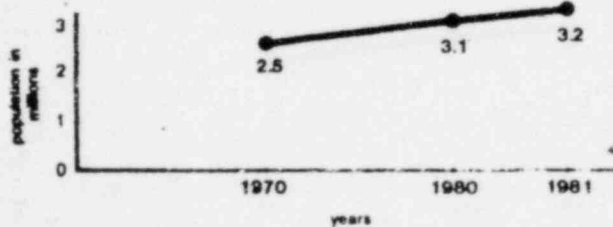
# CURRENT POPULATION ESTIMATES 1981

CASE  
ATTACHMENT

Page 2 of 2

The North Central Texas Council of Governments, in its continuing effort to provide planning and technical assistance to its member governments, presents the eighth issue of "Current Population Estimates." Due to the availability of Census data, we have slightly revised our method of estimating household size. In the past we have utilized the Census estimate of national household size in order to calculate a reduction factor. This factor was then applied to each city's 1970 household size. With the availability of preliminary Census figures, we were able to incorporate more accurate household size figures into our methodology. Therefore when provided, we utilized the Census preliminary household size which was released to the highest elected official of each city. We do not recommend comparison between the 1980 and 1981 NCTCOG estimates due to the above mentioned revisions. However, a comparison between the 1980 Census and the 1980 COG estimates is available upon request.

North Central Texas  
Regional Population Trend



Overall, the NCT Region showed a percent change in population from 1970 to 1980 of 24.0 percent and 3.0 percent from 1980-1981, which reflects the general economic stability of the region. The annual rate of growth within the region from 80-81 (4.1%) compares favorably with previous years. Collin

(7,488), Dallas (27,803), and Tarrant (43,349) counties continued to show the largest numerical increases in population from 1980-81, while Denton (5.6%) Collin (5.2%), Rockwall (5.0%), and Tarrant (5.0%) record the largest percent change from 1980-81. In 1970 Dallas and Tarrant counties captured 81.5 percent of the regional population, however in 1981 they account for 77.6 percent of the region. This decline reflects the national trend toward increased growth in counties surrounding the central urban core.

According to the 1980 Census, the Dallas/Fort Worth SMSA (2,966,342) is the largest metropolitan area in the State. It grew from 1970-80 at an annual rate of 2.3 percent per year with a numerical change of 588,719 persons or 24.8 percent change for the decade. Our estimates show that the SMSA has grown by 91,708 persons or a percent increase of 3.1 percent from April 1, 1980 to January 1, 1981. The cities of Dallas, Fort Worth, Arlington, Garland and Irving all show population in excess of 114,000 persons, while the combined population of Dallas and Fort Worth represents 42.6 percent of the total SMSA population in 1981. The largest numerical increases were in the cities of Fort Worth (14,771), Plano (5,984), Arlington (5,777), Irving (4,891), Garland (4,701), Hurst (4,251), and Carrollton (4,059) which represents 48.5 percent of the total numerical change for the SMSA from 1980-81. Several other cities, including Richardson, North Richland Hills, Denton, Addison, Grapevine, and Bedford, recorded an increase in excess of 2,500 each from 1980-81.

For additional copies of the estimates, contact the librarian at (817) 640-3300. For technical questions or comments, contact Billie Villars or Deborah Findlay, P. O. Drawer COG, Arlington, Texas 76011.



STATE OF TEXAS )

Juanita Ellis, being duly sworn, deposes and says:

That she is President of CASE (Citizens Association for Sound Energy),

and knows the contents of the foregoing

CASE's Answer to Applicants' Motion for Summary Disposition of Intervenor's  
Contention 22 Regarding Emergency Planning and CASE's Answer to Applicants'  
Statement of Material Facts Not Genuinely In Issue

and that the same is true of her own knowledge and belief.

Juanita Ellis  
Juanita Ellis

SWORN TO and Subscribed  
before me on this 30th day  
of August, 1982.

[Signature]  
Notary Public

My Commission Expires: 12/31/84

(SEAL)

The original of this page is being mailed under separate cover, First Class Mail,  
to the Secretary, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555,  
Attention: Chief, Docketing and Service Section, on this 30th day of August,  
1982.

# CASE

(CITIZENS ASSN. FOR SOUND ENERGY)

1426 S. Polk  
Dallas, Texas 75224

214/946-9446

August 30, 1982

Docketing and Service Section  
Office of the Secretary  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Sir:

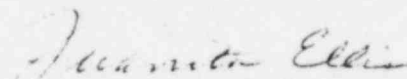
Subject: In the Matter of Application of Texas  
Utilities Generating Company, et al.  
for an Operating License for Comanche  
Peak Steam Electric Station Units #1 and  
#2 (CPSES)

CASE'S Answer to Applicants' Motion for  
Summary Disposition of Intervenor's  
Contention 22 Regarding Emergency Planning  
and CASE'S Answer to Applicants' Statement  
of Material Facts Not Genuinely In Issue

We are attaching the original certification and deposition for subject Answers.

Respectfully submitted,

CASE (Citizens Association for Sound Energy)

  
(Mrs ) Juanita Ellis  
President

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

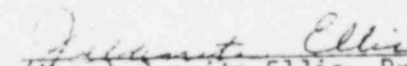
BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	I	
	I	
APPLICATION OF TEXAS UTILITIES	I	Docket Nos. 50-445
GENERATING COMPANY, ET AL. FOR AN	I	and 50-446
OPERATING LICENSE FOR COMANCHE	I	
PEAK STEAM ELECTRIC STATION	I	
UNITS #1 AND #2 (CPSES)	I	

CERTIFICATE OF SERVICE

By my signature below, I hereby certify that true and correct copies of \_\_\_\_\_  
CASE's Answer to Applicants' Motion for Summary Disposition of Intervenor's \_\_\_\_\_  
Contention 22 Regarding Emergency Planning & to Applicants' Statement of Material Facts  
have been sent to the names listed below this 30th day of August, 1982, by:  
Express Mail where indicated by \* and First Class Mail elsewhere.

* Administrative Judge Marshall E. Miller U. S. Nuclear Regulatory Commission Atomic Safety and Licensing Board Panel Washington, D. C. 20555	David J. Preister, Esq. Assistant Attorney General Environmental Protection Division P. O. Box 12548, Capitol Station Austin, TX 78711
* Dr. Kenneth A. McCollom, Dean Division of Engineering, Architecture, and Technology Oklahoma State University Stillwater, Oklahoma 74074	Ms. Lucinda Minton Panel Law Clerk Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555
* Dr. Richard Cole, Member Atomic Safety and Licensing Board U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Atomic Safety and Licensing Board Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555
* Nicholas S. Reynolds, Esq. Debevoise & Liberman 1200 - 17th St., N. W. Washington, D. C. 20036	Atomic Safety and Licensing Appeal Panel U. S. Nuclear Regulatory Commission Washington, D. C. 20555
* Marjorie Ulman Rothschild, Esq. Office of Executive Legal Director U. S. Nuclear Regulatory Commission Washington, D. C. 20555	Docketing and Service Section Office of the Secretary U. S. Nuclear Regulatory Commission Washington, D. C. 20555

  
\_\_\_\_\_  
(Mrs.) Juanita Ellis, President  
CASE (Citizens Association for Sound Energy)