DIVISION OF EMERGENCY SERVICES 85 - STATE CAPITOL (612) 296-2233



STATE OF MINNESOTA

November 5, 1982

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Mr. William Axelson, Chief Emergency Preparedness Section Nuclear Regulatory Commission-Region III 799 Roosevelt Street Glen Ellyn, Illinois 60157

Dear Mr. Axelson:

As you suggested during the recent NRC-sponsored meeting in Chicago, we are writing you with regard to two matters which impact upon Minnesota's radiological emergency response plans.

The first of these items involves Minnesota's notification of any accidents or incidents which may occur at the La Crosse Boiling Water Reactor (LACBWR). At the present time, neither Houston County, Minnesota not the State of Minnesota are notified of such events directly by LACBWR plant officials. (See the enclosed portions of the LACBWR Emergency Plan and the corresponding Implementing Procedures.) Rather, Houston County is notified by the Vernon County Sheriff's Office, and the State of Minnesota is notified by the Wisconsin Division of Emergency Government.

In our view, the delays associated with this type of indirect and secondary notification are unacceptable. A portion of Houston County is located within LACBWR's 5-mile EPZ; and the county is therefore directly affected by a potential emergency at that nuclear plant. At the same time of course, Minnesota State Government would be directly affected by a LACBWR incident that impacted upon Houston County residents.

Consequently, we would like to respectfully request that both Houston County, Minnesota, and the State of Minnesota, be notified directly by LACBWR officials of any accident classification - level incident at LACBWR. These calls should be made to the Houston County Sheriff's Office (507 - 724-3379), and the Minnesota Division of Emergency Services 24-hour Duty Officer (612-778-0800), respectively.

The second item which we discussed briefly with you at the Chicago meeting involves the Public Alert and Notification System. We would



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appreciate clarification of the guidance contained in NUREG-0654, Appendix 3, page 3, B.2.a. This sentence reads as follows: "capability for providing both an alert signal and an informational or instructional message to the population on an area wide basis throughout the 10 mile EPZ, within 15 minutes". Our question relates to the content of the "informational or instructional messages." Specifically, can this standard be met with an initial message which notifies all persons within the EPZ that a health-threatening, or potentially health-threatening incident has occurred at a particular nuclear plant, and a request that residents stay tuned for further details? (This initial message would be followed promptly with specific instructions for residents in the specific geographic area affected.)
This question has developed a a result of recent nuclear power plant exercises. Our experience during these exercises has demonstrated that even with the existence of pre-developed public information messages, it is extremely difficult to disseminate, within the required 15 minutes, an "informational or instructional message" which is completely specific as to the geographic area affected. This is especially true for those frequent instances when the deterioration of the "accident" situation at the plant results in more than one Protective Action Guide recommendation, and correspondingly, the involvement of more than one geographic area, at the same time.

We would certainly appreciate your review of both of these matters. We look forward to hearing from you, regarding their resolution, in the near future.

Kenneth A Janch

Kenneth A. Parsch Acting Director

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Enclosures

CC: Daniel Bement, Chairman, RAC, FEMA-Region V
Joseph LaFleur, Administrator, WIS DEG
Paul W. Shafer, Coordinator Emergency Planning
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2.0 Notification

The emergency action levels and condition classifications are discussed in Section 1.0. When an emergency is declared, EPP-2 provides a notification list of home telephone numbers for those emergency response organization personnel who are to respond to each EAL. This procedure also includes the 24-hour telephone numbers of the local, state, federal and private sector support agencies who are to be contacted, excluding the NRC, which is notified by a direct-ring hot line from the Control Room. All telephone lists contained in the implementing procedures are updated quarterly.

2.1 Initial Notification

- 2.1.1 After declaration of an Emergency Condition, the Shift Supervisor will ensure that the following personnel and agencies are notified as applicable for the Emergency Classification level:
 - · NRC Operations Center
 - Plant Superintendent (Onsite Emergency Response Director) or alternate
 - Assistant General Manager-Power (Emergency Control Director) or alternate
 - · Vernon County Sheriff's Office
 - · Wisconsin Division of Emergency Government
- 2.1.2 The Onsite Emergency Response Director shall notify the Emergency Control Director for an Alert, Site Area Emergency and General Emergency. Subsequent notification of additional key members of the DPC emergency response organization shall be made by the Emergency Control Director or his designee.
- 2.1.3 The Vernon County Sheriff shall notify local and state government agencies as specified in the Wisconsin and Minnesota emergency response plans.
- 2.1.4 The Wisconsin Division of Emergency Government notifies various involved local, state and federal agencies and request assistance as needed.
- 2.1.5 The authenticity of emergency response notifications provided to the Vernon County Sheriff's Office are verified by return telephone call to the EOF or initially LACBWR. This information is detailed in the Wisconsin Emergency Response Plan.

- (7) Report results of contamination survey and the decontamination effort to the RAD as soon as the results become available.
- 4.5.9 The CAS operator will assist the Shift Supervisor in communication and notification. An automatic dialer to accelerate notification of primary LACBWR emergency response personnel is located in the CAS. To notify key individuals carrying pagers, use buttons IA and 2A on automatic dialer or call 783-8466 and 637-2860. When the beeping (wailing for 637-2860) stops, the CAS operator should clearly state: "REPORT TO YOUR RESPONSE STATION," repeat message twice more, and then cancel the call.
- 4.5.10 Notify the Vernon County Sheriff via (637-2123) or (637-2910) or (637-2992) or NAWAS and Wisconsin Warning Center 1 via NAWAS or (266-3232) and Wisconsin Warning Center 3 via NAWAS or (372-3251) that a general emergency is being declared and that the offsite agencies should be activated. The message should 'state: "This is (Caller's Identification) calling from the La Crosse Boiling Water Reactor. A General Emergency has been declared at LACBWR. Immediate notification of the public is warranted. Assistance from your agency is requested immediately and we recommend that you implement your Emergency Response Plan immediately. The General Emergency is (brief narrative description of the event)"

(STA or Duty Shift Supervisor)

4.5.11 Have the Health Physics Technician begin calculating offsite dose estimates as per EPP-5.

(Duty Shift Supervisor)

4.5.12 Activate the Technical Support Center by calling personnel listed on the Technical Support Center roster (Appendix B).

(ERD) (OPD) (RAD)