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February 17, 1983

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In the Matter of
The Cincinnati Gas & Electric Company, et al.
(Wm. H. Zimmer Nuclear Power Station)
Docket No. 50-358

Gentlemen:

A draft of the Brown County (Ohio) Radiological Emergency Response Plan for the Wm. H. Zimmer Nuclear Power Station (designated Rev. 0) has just been distributed to county, State and Federal officials for comment. This plan describes Brown County's support role in implementation of protective actions such as access control and food, milk, water and livestock feed control for a radiological emergency at the Zimmer Station as discussed during the hearing before the Atomic Safety and Licensing Board. If the Appeal Board wishes to receive copies of this document, please let me know.


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Alan S. Rosenthal
Stephen F. Eilperin
Howard A. Wilber
February 18, 1983
Page 2

I am enclosing for the information of the Board three pieces of correspondence relating to emergency planning for the Zimmer Station which have recently come to my attention. I would note that the attachment to the December 22, 1982 letter from the Federal Emergency Management Agency, Region V, to the Ohio Disaster Services Agency was already sent to the Appeal Board by NRC Staff counsel on January 11, 1983.

Sincerely,



Mark J. Wetterhahn
Counsel for the Applicants

MJW:sdd

Enclosures

cc: Judge John H. Frye, III
Dr. Frank F. Hooper
Dr. M. Stanley Livingston
Chairman, Atomic Safety and
Licensing Appeal Board Panel
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Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

Mailing address: Federal Center, Battle Creek, Michigan 49016

December 22, 1982

William Grace, Acting Deputy Director
Ohio Disaster Services Agency
2825 West Granville Road
Worthington, Ohio 43085

Attention: Mr. James Williams

Dear Mr. Grace:

Enclosed is the result of Argonne National Laboratory's review of the Standard Operating Procedures (SOPs) for Zimmer radiological emergency preparedness plans. As indicated by the review, the SOPs were found inadequate and will require modification before they are acceptable.

FEMA Region V is also conducting an independent review of these SOPs and will provide you the results of its review.

We hope the Argonne review serves as a useful tool for your endeavors to modify the SOPs.

Sincerely,

Dan Bement

Dan B. Bement
Chairman
Regional Assistance Committee

Enclosure

EVALUATION OF STANDARD OPERATING PROCEDURES
FOR OHIO AND CLERMONT COUNTY, OHIO
AT THE
WILLIAM H. ZIMMER NUCLEAR POWER STATION

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1
1 OVERVIEW

This review of the William E. Zimmer Nuclear Power Station (ZNPS) Standard Operating Procedures (SOPs) evaluates the adequacy of the SOPs for Ohio and Clermont County, Ohio, listed in the Emergency Preparedness Completion Schedule as submitted by the applicant, Cincinnati Gas & Electric Company (CG&E), to the Atomic Safety and Licensing Board (ASLB) on March 3, 1982.

Completing this task required several steps: (1) comparing the SOPs submitted by CG&E with the Completion Schedule to determine which, if any, have not been submitted; (2) evaluating the extent to which each SOP is consistent with NUREG-0654/FEMA-REP-1, Rev. 1, and the Ohio and Clermont County Nuclear Power Station Emergency Response Plans to which they are appended; and (3) where relevant, evaluating each SOP against the June 21, 1982, Initial Decisions on ZNPS by the ASLB. In addition, this report summarizes the current status of CG&E compliance with requirements imposed in the Initial Decision which were not intended to be addressed by the SOPs. In the interest of brevity, this discussion focuses on deficiencies; where no comment is made, no problem with the SOP was found.

As a result of this evaluation, it was concluded that there were a variety of discrepancies, most of which can be generalized into some areas of concern. First, there is an uncertainty as to whether the drafters of these documents followed any basic criteria with respect to what SOPs are and how they are to be used. This evaluation further disclosed a number of missing portions which indicates that the preparation of these SOPs may not have been as thorough as it should have been.

2 COMPLIANCE WITH EMERGENCY PREPAREDNESS COMPLETION SCHEDULE

As of this date, the Ohio and Clermont County SOPs listed in the Emergency Preparedness Completion Schedule have not all been finished, although most appear to be complete. All of the Off-Site Standard Operating Procedures for Clermont County have been submitted. All of the Off-Site Standard Operating Procedures for Ohio have either been submitted or are no longer relevant, with the exceptions of Accident Assessment and Ingestion Pathway Sampling. The Accident Assessment SOPs must be evaluated at the State EOC and the Ingestion Pathway Sampling SOP has not been prepared. Remaining to be developed in the Public Information Package is the Circle of Safety Pamphlet. The Telephone Book Insert has been recently completed and will require an evaluation to determine the state of adequacy. Neither the Public Notification System Test nor the Off-Site Training has occurred; the latter is not expected to begin until just prior to the next scheduled radiological emergency preparedness exercise. Finally, the Ohio and Clermont County plans have not been reviewed as specified in the completion schedule.

3 EVALUATION OF COMPLETED CLERMONT COUNTY OFFSITE STANDARD OPERATING PROCEDURES

In general, it was difficult to understand how the completed SOPs were to be used in conjunction with the existing Clermont County Plan. The subjects covered in the Clermont County SOPs and the Clermont County Plan were identical in a number of instances, but they differed in important respects in the instructions given. Since no scheme was evident to explain to emergency workers when to use the plan and when to use the SOPs, one can predict considerable confusion in the event of a radiological emergency. Indeed, the Clermont County SOPs repeat so much of what already is in the Clermont County Plan (often in different words) that these SOPs resemble plan amendments. Emergency response would be improved by rewriting the Plan and SOPs into a single document, except for the EBS/NOAA message SOPs.

3.1 CLERMONT COUNTY SOP INTRODUCTION (SECTION 1.1)

The legal authority that is noted on page one of the SOP introduction is different from that cited on page II-B-I in the Clermont County Plan.

3.2 CONCEPT OF OPERATIONS (SECTION 2)

The composition of radiological monitoring teams as described in this SOP is at variance from that outlined in the Clermont County Plan, which itself differs from the Ohio Plan. The Clermont County SOP states in its discussion of the Concept of Operations (page two) that separate State and County teams will be organized. However, the Clermont County Plan (page II-B-I) says that each monitoring team will consist of one County member and two State members. Meanwhile, the Ohio Plan (page II-B-3) states that monitoring teams will be composed of three State members.

3.3 NOTIFICATION AND VERIFICATION (CLERMONT COUNTY SOP SERIES 100)

The emergency classification system used in initially notifying emergency workers is not consistent with NUREG 0654, FEMA-REP-1, Rev. 1, D.3. The Sheriff's

Office Notification Procedure (SOP #101, page five) states that the Sheriff's office translates the utility's classification of the emergency (i.e., unusual event, alert, site area emergency, or general emergency) into a number ranging from one to four when notifying emergency workers to report to the emergency operating center (EOC). This is contrary to FEMA planning guidance and could cause confusion in an actual emergency. The classification system used when initially notifying emergency workers should be the same as that of the utility.

In addition, most of the telephone or pager numbers which are required to notify emergency personnel are missing from SOP Series 100 and must be supplied.

3.4 MOBILIZATION PROCEDURES (SOP SERIES 200) (NOT INCLUDED IN THE COMPLETION SCHEDULE, BUT SUBMITTED FOR REVIEW)

This Clermont County SOP is deficient in two respects. First, it states that sampling points for field team monitoring are to be determined from the Follow-up Information Form, Part I (SOP 201, page one). However, nothing is mentioned about which sampling points to use in case this form is not available. It is recommended that a reference to Table E-1 in the Clermont County plan be added, which specifies the preselected sampling points in the County.

Second, the field monitoring team equipment list (SOP 201, page three) simply states that "protective equipment, as necessary" should be carried by each monitoring team. A list of such equipment should be provided in the SOP.

3.5 ACCIDENT ASSESSMENT (CLERMONT COUNTY SOP SERIES 300)

The Plume Exposure Rate Verification SOP (SOP #302, page two) states that County field monitoring teams are to periodically monitor their personal dosimeters and radio back to the EOC for further instructions in case the reading exceeds 3/4 of full scale. Since many of the dosimeters in Clermont County are the CDV-742 model, whose scale ranges from zero to two hundred rems, this SOP could be read to authorize exposure of some workers of up to 150 rems before the EOC

is even notified. This conflicts with NUREG 0654, FEMA-REP-1, Rev. 1, K.4, which only permits exposures in excess of Environmental Protection Agency General Protective Guidelines with prior permission of appropriate officials.

3.6 RADIATION EXPOSURE CONTROL (SOP SERIES 400)

The Radiological Equipment SOP (SOP #401, page two) provides for emergency workers to be issued CDV-742 self-reading pocket dosimeters. This is inappropriate under NUREG 0654, FEMA-REP-1, K.3.a for such persons because the dose level at a nuclear power plant accident is expected to be considerably lower than the CDV-742 is intended to indicate. The result could be unnecessary exposure to low (but still dangerous) radiation levels among workers whose dosimeters were not sufficiently sensitive to indicate any exposure at all. Either the CDV-730 (indicates 0-20 rems) or the CDV-740 (indicates 0-100 rems), supplemented by the CDV-138 (indicates 0-100 millirems) is recommended for each worker.

The Radiological Equipment SOP (SOP #401, page two) contradicts the Clement County Plan in its discussion of permanent record dosimeters. The latter states (page II-3-1) that provisions shall be made for permanent record dosimeters, but the former says that thermoluminescent dosimeters should be worn by emergency workers if available. NUREG 0654, FEMA-REP-1, Rev. 1, K.3.a requires permanent record dosimeters; this SOP should be modified to be consistent with this requirement and the Clement County Plan.

The Radiological Equipment SOP (SOP #401, page two) states that emergency workers are to read their dosimeters every fifteen minutes and to communicate any abnormal increase to their supervisors. This interval may or may not be appropriate, depending on field conditions, and requires training emergency workers to understand what an abnormal increase is. This SOP should be modified in accordance with NUREG 0654, FEMA-REP-1, Rev. 1, K.3.b to require

the Ohio Department of Health to determine the proper frequency given the circumstances of an accident and instruct emergency workers accordingly.

3.7 EOC OPERATION CHECKLIST (SOP SERIES 500)

Several aspects of this SOP are unclear. First, the discussion of the duties of the Superintendent of Schools (SOP #501, page twelve) states that the Superintendent is to contact the schools listed in table III-A in the Clermont County Plan. This ignores the Clermont County School System Radiological Emergency Protective Action Procedures. Second, form 502-27 (SOP #502, page 11) refers the reader to the notification list in the Protective Action Procedures, making no mention of the Clermont County Plan list. Finally, none of the above discussions of the Superintendent's responsibilities clearly indicate whether he is to report to the EOC first upon being notified of an emergency at ZNPS, or whether he is to notify the schools of the situation and then report to the EOC. All of these matters require clarification.

3.8 MISCELLANEOUS PROCEDURES (SOP SERIES 600) (NOT INCLUDED IN THE COMPLETION SCHEDULE, BUT SUBMITTED FOR REVIEW)

No deficiencies were found in this Clermont County SOP.

3.9 CLERMONT COUNTY SCHOOL SYSTEM RADIOLOGICAL EMERGENCY PROTECTIVE ACTION PROCEDURES

Two problems were discovered in reviewing this SOP which must be corrected in addition to the difficulties pointed out in the ASLB Initial Decision (discussed separately below). First, it appears that the system for notifying each school district of an emergency and verifying this notification is awkward at best, and possibly unworkable. The SOP requires the Superintendent of the Clermont County Board of Education and an appointed assistant to telephone between them the head of each of the eighteen separate school districts in and around the EPZ and each of the school district heads, in turn, to telephone the Superintendent to verify the situation before taking protective actions. This

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means that two people must participate in some 36 different telephone calls before notification of schools will be complete. A more efficient system is required.

Second, the Protective Action Procedures lack many of the telephone numbers of individual schools which school district heads must call. These telephone numbers must be entered before this SOP can be acceptable.

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3.10 EBS/NOAA ACTIVATION AND MESSAGE PREPARATION (CLERMONT COUNTY DISASTER SERVICES DIRECTOR AND SHERIFF, ORIGINATING STATION, AND NATIONAL WEATHER SERVICE)

The maps contained in these four almost-identical SOPs are confusing. First, the road map contained in each package does not include evacuation routes; since a primary purpose of the EBS and NOAA messages is to indicate these, it would help the broadcaster explain how to evacuate if the maps indicated evacuation routes. Second, the sector map in each SOP would be much clearer if it showed roads, as well as sectors, so that the broadcaster could see the boundaries of each sector, rather than trying to figure them out from the written descriptions included in attachment #4. Finally, the maps indicating "EBS Areas" are inconsistent with the protective action instruction in the Clermont County Plan (page II-I-3 and figure I-2 on page II-I-17), which specify the sector designations in Table I-1 of NUREG 0654, FEMA-REP-1, Rev. 1 for protective actions.

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4 EVALUATION OF COMPLETED OHIO OFFSITE STANDARD OPERATING PROCEDURES

Significant discrepancies were found between what the Emergency Preparedness Completion Schedule listed as outstanding Ohio SOPs and what Ohio Disaster Services Agency personnel submitted for review. First, two SOPs which are listed in the Completion Schedule as being complete -- "EOC Activation" and "Notification" -- are not SOPs at all, but are contained in the Ohio Plan (Figures II-G-2 and II-G-3, respectively). Since these already have been reviewed as part of the Regional Advisory Committee review of the Ohio Plan, they have not been reviewed again here. Second, the two SOPs listed in the Completion Schedule as the "EOC Operations Checklist" and "EBS/NOAA Activation and Message Preparation" are no longer relevant to the Ohio Plan: the former will no longer be used at all, while the latter is exclusively a Clermont County activity (and is evaluated as such under 3 above). Third, the SOPs listed in the Completion Schedule as "Accident Assessment" and "Ingestion Pathway Sampling" have not yet been submitted for review: the former apparently is complete, but is not appropriate for review at the Ohio EOC because it involves checking the operation of a state-owned computer, while writing of the latter has not yet been started.

4.1 RADIOLOGICAL MONITORING (CORRESPONDS TO "RADIATION EXPOSURE CONTROL" AND "RADIATION CONTROL AND MONITORING" IN THE COMPLETION SCHEDULE)

The document, "Standard Operating Procedures -- Radiation Monitoring", is a SOP for the field monitoring and decontamination teams that are operated by the Ohio Disaster Services Agency. The SOP contains procedures for the mobilization of teams to the affected areas, equipment to be used, and the step-by-step procedures that will be used to monitor the plume, radioactive iodine concentrations, and any radioactivity that may be deposited. It also describes locations for radiological sampling, the sensitivity of the radiation

detection instruments to be used, and procedures for communications to be used by the monitoring teams. However, radiation control measures are only mentioned with respect to the monitoring and decontamination teams.

The SOP appears to be written for trained radiological responders that are familiar with dosimetry and decontamination procedures. Assuming that the responders are trained personnel, the SOP dealing with Radiological Monitoring contains no deficiencies.

5 PUBLIC INFORMATION PACKAGE

The only SOP in this category that is complete at this writing is the Transient Notification Program. This consists of two signs, one for area airports and one for marine facilities on the Ohio River. The sign for airports directs pilots to refer to their notes and indicates that an area of restricted air space will be designated in the event of an accident. The sign directed to boaters explains the sirens which will be sounded, directs them to tune to the appropriate VHS or Marine Band radio, and contains a map of local docking areas along the Ohio River to which boaters will be directed to evacuate. No deficiencies were found in the airport signs, but it is unclear how realistic it is to expect boaters on the Ohio River to remember the VHS radio frequencies and dock locations from a map posted on a bulletin board back at the marina from which they departed.

6 DEFICIENCIES IDENTIFIED IN ATOMIC SAFETY AND LICENSING BOARD INITIAL DECISION

The Initial Decision of the Atomic Safety and Licensing Board, announced on June 21, 1982, found a number of deficiencies in the planning for a radiological emergency at ZNPS. Since the Emergency Preparedness Completion Schedule was written prior to the Initial Decision, there is no reason to expect that the SOPs submitted in compliance with the Completion Schedule would correct any of the problems identified in the decision. However, in the interest of thoroughness, this section will discuss the extent to which the SOPs correct the deficiencies which the decision found and explain current efforts known to be underway at this writing to correct them.

6.1 EVACUATION OF CLERMONT COUNTY SCHOOLS

The Initial Decision (pages 31-33) points out that the ability to evacuate Clermont County schools is reduced by the Plan's reliance on telephone communications to inform the schools to evacuate, an insufficient number of school buses with which to evacuate children, and an inadequate ability to communicate with school bus drivers. The Clermont County School System Radiological Emergency Protection Action Procedures contain nothing which addresses these deficiencies. All communication discussed in these Procedures is by ~~conventional~~ telephone and no mention is made of school bus drivers.

Some activities are known to be taking place to correct these deficiencies. First, the New Richmond Exempted School District is installing its own radio communication system, although it is not expected to be operative until ZNPS goes on line. Second, CG&E is scheduled to meet with all of the school superintendents of affected districts on October 26, 1982 to propose a system for correcting these deficiencies.

6.2 SURVEY OF VOLUNTEER PERSONNEL

The decision imposes as a license condition (page 94-95) the requirement that a survey of volunteers assigned an emergency response role in the Plans be conducted and sufficient proof presented to the Nuclear Regulatory Commission staff to assure that such volunteers will respond to a radiological emergency as EMRs as provided in the Plans. Nothing in any of the SOPs addresses this license condition. However, it is known that CG&E has developed a survey questionnaire and intends to distribute it to emergency response volunteers at the conclusion of emergency response training scheduled for next Spring.

6.3 ASSISTANCE TO TRANSPORTATION DEPENDENT PERSONS

The decision imposes as a license condition (page 95) the requirement that responsibility be specified clearly for assuring that the needs of transportation dependent persons are met. Nothing in the SOPs addresses this license condition.

6.4 INSTALLATION OF REPEATER STATION AND RADIO BASE

The decision imposes as a license condition (page 95) the requirement that a repeater station and three 100 watt radio base stations be installed to eliminate "dead spots" in radio communications. Nothing in the SOPs address this license condition. However, it is known that the repeater station has been installed and will become operative upon completion of the larger microwave communications system which is to be finished in March 1983.

6.5 "CIRCLE OF SAFETY" REVISIONS

The decision imposes as a license condition (page 95) the requirement that the publication "Circle of Safety" be revised to give more information about services available at relocation centers and be reissued. Nothing in the SOPs addresses this license condition. However, it is known that CG&E intends to complete revisions on this document around the end of 1982.

6.6 EVACUATION ROUTE MAPS

The decision imposes as a license condition (page 95) the requirement that additional evacuation routes be included on maps available to the public. Nothing in the SO's addresses this license condition.

STATE OF OHIO

ADJUTANT GENERAL'S DEPARTMENT

2825 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085

RAYMOND R. GALLOWAY
MAJOR GENERAL
THE ADJUTANT GENERAL

RICHARD F. CELESTE
GOVERNOR

DISASTER SERVICES AGENCY

AG011-DS

February 1, 1983

John Anderson, Regional Director
Federal Emergency Management Agency
Region V
300 S. Wacker St.
Chicago, Illinois 60606

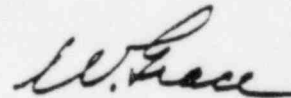
Dear Mr. Anderson:

The Ohio Disaster Services has reviewed the comments of the Argonne National Laboratory Review Group for the Clermont County Standard Operating Procedures (SOP's) as suggested in a letter dated December 22, 1982, from Dan Bement, FEMA, Region V, RAC.

Our office finds the review to be unacceptable specifically due to the lack of direct reference to any single part, paragraph or line number of the SOP's. The review is subjective in nature, and can only be considered as an opinion voiced by a review group without a specific standard against which to base the review. It is our belief that the Stone & Webster Engineering Corporation made a bonafide attempt to write down the procedures used by county agencies as they were described to them by each specific agency.

As the letter indicates, we will await a final review comment from FEMA, Region V, which will indicate an official viewpoint on the written SOP's. Based on the January 6, 1983, meeting conducted by FEMA, Region IV and V, it would appear that field verification schedules for these SOP's will provide the opportunity for the FEMA staff to make a final judgment as to whether the agencies can implement the SOP's as written.

FOR THE DIRECTOR



WILLIAM V. N. GRACE
Acting Deputy Director

JRW:liv

c.c. Dan Bement - FEMA V - Battle Creek
Stone & Webster Engineering Corp.
Clermont County DSA
Cincinnati Gas & Electric Co.

414 Walnut Street, Suite 1006
Cincinnati, Ohio 45202
January 19, 1983

The Honorable Richard F. Celeste
Governor, State of Ohio
The State House
Broad & High Streets
State Office Tower
Columbus, Ohio 43215

Dear Governor Celeste:

On behalf of our organizations, we wish to offer, once again, our sincerest congratulations to you on your recent election victory. We stand ready to assist you in the difficult task of insuring the economic strength of our great state and the social and physical well being of all Ohioans, both today and for generations to come.

It is in this spirit that we write you to propose that you appoint a Governor's Advisory Council to help you address the concerns which we share about the safety, reliability and expense of the William H. Zimmer Nuclear Power Station (Zimmer). The State of California established the precedent for state participation in resolving similar issues in the Diablo Canyon case. Our proposal tailors this precedent to Ohio's needs.

We recommend that the Advisory Council be made up of between five and nine citizens of the State of Ohio who have demonstrated an understanding and concern for the problems of the facility which is being built near Moscow, Ohio by the Cincinnati Gas and Electric Company, the Columbus and Southern Ohio Electric Company and the Dayton Power and Light Company.

The purpose of the Council would be to monitor, for the Governor and the citizens of this state, the work of the U.S. Nuclear Regulatory Commission (NRC), the Cincinnati Gas and Electric Company and its agents in their review of the safety and construction of the plant. The Council would then monitor the federal and utility evaluation of the steps needed to complete the construction and the licensing of the facility. Finally, this advisory group would assist in addressing the project's financial impact on Ohio's consumers, including the financial impact of any mismanagement which might be uncovered by the review and audits.

The magnitude of the problem at Zimmer is outlined in the November 12, 1982 NRC order halting construction. The order

notes, "The Zimmer facility has been constructed without an adequate quality assurance program . . . resulting in the construction of a facility which currently is of indeterminate quality." The need for the Council is accented by NRC Regional Administrator James Keppler who said recently, ". . . I think that there is a serious question over the capabilities of the utility to do this job properly and I think that, clearly, the NRC has a stigma attached to its performance in the past . . ."

Despite the record of nearly a decade of problems at Zimmer, the public has not had any level of state or local government, other than the office of the State Boiler Inspector, conducting ongoing scrutiny of the project. Even without the assistance of the resources of their government, Ohio's citizens have participated in the process of uncovering what James Keppler has called the "total breakdown" in quality assurance at the plant. In fact, NRC Commissioner James Asselstine said at a hearing before Congressman Ottinger's subcommittee that "We [the NRC] weren't the ones that identified the breakdown in the Zimmer case. They were identified by members of the public, not by the agency."

The present and future cost associated with the problems at Zimmer is a matter of great public concern. When construction began, the projected construction cost was \$240 million. While it is now certain that the final cost will exceed \$2 billion, the utility is unable to predict neither the final cost nor the plant's completion date.

Based upon the troubled history of the Zimmer plant and the resultant lack of public confidence in both the utility and the NRC, we strongly believe that the citizens of Central and Southwestern Ohio cannot rely solely upon the NRC to insure their public health and safety interests, nor does the NRC have any interest in the project's impact on Ohio's consumers. We have concluded that the safety and the financial interests of Ohioans can be defended adequately only with the participation of the State of Ohio, working in close cooperation with the concerned citizens of Central and Southwestern Ohio.

The proposed Advisory Council would foster this cooperation by carrying out the following tasks:

1. Monitor the upcoming management review and technical audits of the Zimmer project to scrutinize the degree of competence and independence of the auditors and reviewers and issue periodic reports to the Governor on these matters.

2. Carry out public education, with the Governor's approval, on the process; facilitate broad-based public participation where it is called for and insure that the NRC lives up to its commitments and obligations to the public, such as its commitment to hold meetings on Zimmer in the public view;

3. Communicate any point of view or policy of the Governor at these public meetings;

4. Review the written material which is generated by the management review and audits and make appropriate comments;

5. Communicate with management reviewers and auditors where appropriate to seek answers to questions raised by the Governor and the people of the State of Ohio, and;

6. Develop cost-effective strategies for the direct involvement of the State of Ohio in the licensing process.

There is no public or private entity in the State of Ohio doing these tasks in a consistent and comprehensive way. The leadership of the Governor and the resources of state government are badly needed to insure that the interests of safety, integrity and reliability are served.

CINCINNATI ENVIRONMENTAL
ADVISORY COUNSEL

By

LEAGUE OF WOMEN VOTERS OF
THE CINCINNATI AREA

By

Carolyn B. Miller

SIERRA CLUB, MIAMI GROUP,
OHIO CHAPTER

By

Bonnie Pence

ZIMMER AREA CITIZENS/OHIO

By

Vicki Hudson Meyer



KENNETH W. CONOVER
Director

CLERMONT COUNTY CIVIL DEFENSE
DISASTER SERVICES AGENCY

- Batavia, Ohio 45103 -



COPY

February 11, 1983

Mr. John Anderson, Regional Director
Federal Emergency Management Agency
Region V
300 S. Wacker Street
Chicago, Illinois 60606

Dear Mr. Anderson:

As you are probably aware, the Ohio Disaster Services Agency submitted to you a letter dated February 01, 1983, stating their official position on the review comments of the Clermont County Standard Operating Procedures (SOP's) as prepared for FEMA by the Argonne National Laboratory Review Group.

Likewise, this letter will serve to inform you of the Clermont County position on the Argonne review. I have discussed the comments provided by the Argonne National Laboratory with both the Ohio Disaster Services Agency and our consultants, Stone & Webster Engineering Corporation. I concur with the Ohio Disaster Services Agency position as stated and therefore the Argonne review comments are not acceptable to Clermont County as they are considered to be subjective in nature without having specific standards in which to base such review comments.

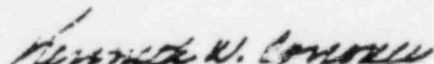
Furthermore, I am confident that Stone & Webster Engineering Corporation has placed forth a bonafide effort to develop functional SOP's which are capable of being implemented, based upon initial information provided to them by numerous organizations. The Clermont County Disaster Services Agency has taken every possible measure to ensure adequacy and consistency through coordination efforts with both Stone & Webster Engineering Corporation and the Ohio Disaster Services Agency. The Radiological Emergency Response Plan and the Standard Operating Procedures are living documents, subject to revision, in order to assure a positive approach to emergency response and preparedness with regard to radiological emergency situation. Both documents are currently being revised in order to correct deficiencies or incorporate new resource capabilities as additional personnel are trained and/or emergency equipment is added (i.e., Communications and Warning Systems).

Mr. John Anderson
January 11, 1983
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Based on a January 06, 1983, meeting conducted by FEMA Region V (i.e., Bob Shapiro), it is apparent that FEMA field verification schedules for Clermont County SOP's will provide the opportunity for FEMA to formulate an official position as to the adequacy of currently drafted SOP's and a determination of whether or not they can effectively be implemented. I will await a formal SOP evaluation from FEMA Region V, which hopefully will serve as a meaningful review, thus providing the necessary standard in which to base such comments.

Should you have any questions concerning this matter, please feel free to contact me at (513) 732-7235.

Sincerely,


Kenneth W. Conover
DIRECTOR, COORDINATOR

KWC:brp

cc: Dan Bement, FEMA Region V - RAC
Ohio Disaster Services Agency
Stone & Webster Engineering Corporation
Cincinnati Gas & Electric Company
Board of Clermont County Commissioners
Files - ZNPS Project Files
Outgoing Correspondence FY83
Director