

BOSTON EDISON

Pilgrim Nuclear Power Station
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October 4, 1990
BECo Ltr. #90.119

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Docket No: 50-293
License No: DPR-35

Subject: Boston Edison Company Response to NRC Request for Information on
Offsite Emergency Planning for Pilgrim

Dear Sir:

Attached, in accordance with the letter from Mr. Steven Varga dated September 14, 1990, is Boston Edison's: (1) analysis of the September 6, 1990 public meeting transcript and FEMA's August 27, 1990 final exercise report; and (2) plan to correct outstanding issues. As we have consistently stated in the past, the views expressed in this document are those of Boston Edison and do not necessarily represent the views of the Commonwealth or the local communities.

Because of the size of the enclosed report, this letter summarizes: (1) Boston Edison's basic findings and conclusions as a result of its analyses of the public meeting transcript and FEMA exercise report; and (2) the bases for our conclusion that the offsite emergency response program for Pilgrim Station more than adequately addresses the offsite planning standards set forth in NUREG-0654 and FEMA's Guidance Memoranda, and provides reasonable assurance that the health and safety of the public would be adequately protected in the event of an emergency at Pilgrim.

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- The Offsite Emergency Response Program for Pilgrim Exceeds Applicable Regulatory Requirements and is One of the Best Programs of its Kind in the Country.

It has been Boston Edison's consistent position (as well as that of the NRC and FEMA) that significant improvements have been achieved in the offsite emergency response program for Pilgrim Station over the last several years. In meetings attended by Commonwealth officials, FEMA representatives have stated that the Pilgrim program is the best in the region. We have invested extensive resources in assisting the Commonwealth and local communities in achieving that objective and we are very proud to have been instrumental in these accomplishments. We believe that with our assistance, the Commonwealth and the local communities have established one of the finest and most comprehensive offsite emergency response programs in the country.

It is well recognized that emergency planning is a fluid process, that improvements are always possible, and that program changes are needed to respond to changing circumstances. However, when viewed against applicable regulatory requirements and guidelines, we firmly believe that the offsite program at Pilgrim provides reasonable assurance that the health and safety of the public would be adequately protected in the event of an emergency at Pilgrim Station. Underlying that conclusion are the following key points and findings which are discussed in more detail in the attached report:

- (1) "Formal" Commonwealth or Local Community Approval of Plans and Procedures is Not Necessary for a Finding of Reasonable Assurance and Does Not Detract from the Efficacy of the Offsite Planning Program.

One of the criticisms stated in the public meeting transcript is that plans or procedures have yet to be "approved." To date, neither the Commonwealth nor the local communities have "formally approved" the numerous plans or any of the hundreds of implementing procedures, nor have those documents been forwarded to FEMA for formal review under 44 CFR Part 350. This lack of formal approval does not, however, detract from the efficacy or acceptability of those documents. Detailed plans and procedures have been developed through extensive interaction between Commonwealth, local, and Boston Edison officials over the last three years. Virtually all of those plans and procedures have been reviewed by FEMA in the technical equivalent of a formal "350" review, and they are in use by responsible emergency response officials. The effectiveness of the plans and procedures was demonstrated in the October 1989 exercise and the May 1990 remedial exercise.

Lack of "formal approval" does not prevent either of the responsible federal agencies from concluding that the offsite program meets the "reasonable assurance" standard contained in NRC and FEMA regulations. NRC and FEMA regulations clearly distinguish between interim findings supporting the NRC licensing process (which may clearly be based upon a

review of "draft" plans) and final, formal plan reviews pursuant to 44 CFR Part 350. See 10 CFR 50.47(a)(2) and 44 CFR 350.3(f). Plans and procedures need not be "final" but must be sufficiently developed to enable the responsible federal agencies to provide a reasonable assurance finding. See e.g., Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-932, 31 NRC 371, 389 (1990); Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), ALAB-808, 21 NRC 1595, 1601 (1985). The offsite program for Pilgrim meets that criterion by a wide margin.

(2) An Adequate Offsite Emergency Response Program Does not Need to Include Advance Planning for Every Possible Contingency.

Underlying some statements at the public meeting is the apparent assumption that an offsite emergency response program must account, in advance, for every possible contingency. That is neither legally required nor practically possible. The purpose of such a program is to provide a framework and basis for protecting the public and for taking additional ad hoc measures as may be necessary. The offsite program for Pilgrim is founded upon a set of highly detailed implementing procedures for each responsible emergency response official and provides an unusually high degree of advance planning for anticipated contingencies.

(3) The October 1989 Exercise and May 1990 Remedial Exercise Demonstrate the Effectiveness of the Offsite Program.

Some persons have criticized the offsite program based upon the results of the October 1989 exercise and the May 1990 remedial exercise. While some of the concerns warrant further interaction between responsible public officials and Boston Edison, they must be placed in their proper regulatory context.

FEMA's final report on the October 1989 exercise and the May 1990 remedial exercise identified no Deficiencies, 43 Areas Required for Corrective Action (ARCA), 28 Areas Recommended for Improvement (ARFIs), and 9 planning issues. It also found that 46 of the prior 48 ARCAs had been resolved. Two previously identified Deficiencies were corrected in the May 1990 remedial. Thus, at the present time, there are no outstanding Deficiencies standing in the way of a reasonable assurance finding. Outstanding ARCAs (which are typically scheduled for correction prior to the next scheduled biennial exercise) by definition are not considered sufficient to preclude a finding that plans and preparedness are adequate to protect public health and safety.

(4) Adequate Transportation Resources Have Been Provided.

Testimony at the September 6 public meeting addressed the adequacy of transportation resources (particularly the availability of buses, vans and ambulances to evacuate persons needing such assistance in an emergency). Ample resources have been committed to achieve this objective. See response to Item Tr-117 in the attached report.

Ample transportation resources are available even with the conservative assumptions used to calculate the extent of the transportation need. These conservatisms include:

- (a) The size of the population estimated to be in need of transportation assistance is based upon an assumed evacuation of the entire EPZ, a very unlikely scenario;
- (b) School, day-care and special facilities are assumed to be in operation, their populations are calculated using maximum facility enrollment and maximum occupancy figures obtained from the facility administrators themselves, and all persons in these facilities are assumed to need transportation assistance; and
- (c) Sufficient resources have been provided to evacuate all transportation dependent persons with no more than a single trip by any vehicle (i.e., a "one-lift" plan). No credit has been taken for routing any vehicle for a second lift;

If more realistic assumptions were utilized, the surplus transportation resources would be even greater than currently calculated.

(5) Adequate Arrangements for the Special Needs Population Have Been Established.

Testimony was heard at the public meeting that as much as 18% of the Pilgrim EPZ population has some form of disability and that the emergency plans for special needs individuals have not accounted for this number of people. This 18% number is taken from a national census survey and is not relevant to an estimate of the special needs population in the Pilgrim EPZ who might require assistance during an emergency. The critical question is not whether a person can be classified as disabled under a definition developed for an academic statistical study, but instead whether functionally such a person would need special assistance in being alerted or taking protective action in an emergency. We are not aware of a single offsite planning program in the country that has identified such a large segment of its EPZ population to require the provision of such resources (e.g., liftvans, Telecommunications Devices for the Deaf).

Furthermore, the study performed by Chadwick, Martin and Bailey consultants (and cosponsored by MCDA, the Massachusetts Office of Handicapped Affairs and Boston Edison) provided a Pilgrim EPZ - specific estimate of the size of the special needs population and determined that approximately 2.5% of the Pilgrim EPZ population would have a special need in an emergency. These results have been used in the planning process. Sufficient resources are in place to provide for the maximum estimated number of special needs individuals. An enhanced, self-identification survey was distributed in September to all households in the EPZ which will provide an additional opportunity for special needs persons to

identify themselves over and above prior Public Information Brochure mail-in cards and other initiatives previously utilized. Adequate arrangements have been made for the special needs population. See responses to Items Tr-2, Tr-7, Tr-8 and Tr-12 in the attached report.

(6) Planning for Evacuation of Saquish Neck and Gurnet Point Is Adequate.

Testimony was heard at the public meeting regarding egress from Saquish Neck and Gurnet Point during lunar high tides. As we discuss in response to Item Tr-32 in the attached report, periodic lunar high tides only affect egress from Saquish Neck, not from Gurnet Point or Duxbury beach. Furthermore, even during a lunar high tide, egress is not completely blocked. In an emergency, persons on Saquish Neck could evacuate by walking or driving over dune areas which remain dry even at high tides. While these areas are environmentally protected, in an emergency they could be used to obtain egress. In any event, even if it were assumed that egress was blocked during the period of tidal flooding, evacuation times for the Saquish population would not be significantly different from the evacuation times for other persons in the EPZ. Furthermore, some of the testimony raised concerns about the population estimates for the Saquish-Gurnet beaches. Emergency plans and procedures for Saquish-Gurnet were based upon the most definitive estimate of the beach population -- an actual count of the beach population in the middle of the afternoon during a sunny Fourth of July weekend.

(7) Adequate Interim Host School Planning for Duxbury and Marshfield Students was Demonstrated in the Exercise and Permanent Improvements are Underway.

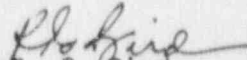
Testimony at the public meeting expressed the need for additional planning for host schools for the Duxbury and Marshfield student populations. During the 1989 exercise process, the Commonwealth's interim program for the protection of these students was evaluated and successfully demonstrated (although one ARCA remains which requires demonstration during the next biennial exercise). See response to Item Tr-153 in the attached report. Since the 1989 exercise, additional improvements have been achieved including identification of specific host schools for Duxbury and Marshfield students and the development of applicable implementing procedures. When these improvements are complete, they will be substituted for the Commonwealth's interim program. See responses to Item Tr-5 in the attached report.

(8) Reception Centers and Monitoring/Decontamination Capabilities are Adequate.

The status of the three reception centers and their ability to monitor 20% of the evacuating EPZ population in about 12 hours in accordance with applicable FEMA guidance was also discussed at the public meeting. The three reception centers have been enhanced and equipped. Procedures for their activation and operation have been developed and personnel have been trained. They are fully capable of performing monitoring in accordance with applicable federal regulatory guidelines. See our responses to Items Tr-69 and Tr-54 in the attached report.

- Conclusions

For the reasons stated above and discussed in greater depth in the attached report, Boston Edison believes that the testimony criticizing the offsite emergency response program for Pilgrim is either in error, or does not raise issues of such a nature that they can be found to have an adverse effect on the ability to protect public health and safety in the event of an emergency at Pilgrim Station.


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cc: see attached sheet

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Boston Edison Company Response to
NRC Request for Information
on Offsite Emergency Planning for Pilgrim

Boston Edison Company

October 4, 1990

The views expressed in this document are those of Boston Edison Company. They do not necessarily reflect the views of the Commonwealth or local officials.

I. INTRODUCTION

I. Introduction

The purpose of this report is to provide Boston Edison Company's response to the NRC Staff's September 14, 1990 letter requesting information on the offsite emergency response program for Pilgrim Station. This report is organized as follows:

Section II provides an item by item response to the allegations and concerns identified in the September 6, 1990 public meeting transcript. Each item is quoted verbatim from the transcript and assigned a "Tr" item number. Following each quote is the transcript page number where the allegation is contained and Boston Edison's specific response including detailed references to specific supporting documentation. In some cases, supporting documentation is attached to each response.

Section III of this report responds to any items contained in the attachments to the public meeting transcript, and not already addressed in Section II in response to the transcript references themselves. These items are assigned a "Tr-A" number and are responded to in the same manner as the transcript references. Thus, if an attachment contains allegations which have been addressed in Section II of this report, we reference the "Tr" item in Section II rather than providing a separate response to such allegations in Section III.

Section IV of this report contains Boston Edison's item by item responses to FEMA's August 27, 1990 "Final Exercise Assessment" on the October 12-13, 1989 exercise (and the May 25, 1990 remedial exercise). Each outstanding ARCA and ARFI identified in FEMA's final report is quoted verbatim from the FEMA report and assigned an "Ex" item number. Following each quote is the page number from the exercise report where the item is contained, additional identifying information from the FEMA report, Boston Edison's specific response, and where appropriate, corrective action and the schedule for correction.

Some clarifications are warranted regarding our references to specific plans or procedures as supporting documents in this report. We have not attempted to cite all relevant provisions from all of the Commonwealth and local plans and procedures. Instead, we have attempted to provide references to a plan or procedure from the Commonwealth or from one local community that is representative of other similar plans or procedures. A reviewer of this report may examine the particular procedure that is cited or may review other similar procedures available from the Commonwealth or the local communities. While not identical from community to community, plans and procedures exhibit a high degree of uniformity.

In addition, we have also cited the most recent relevant plan or procedure revision. In some cases the plan or procedure may be the last revision which has been reviewed by local officials and whose comments have been incorporated. In other cases, the referenced plan or procedure is the latest annual revision currently being reviewed by Commonwealth or local officials. Although programmatic documents are periodically revised, we

have provided the most accurate and current documents available. The plans and procedures cited provide a representative picture of the status of the offsite planning program today.

Section V of this report summarizes our conclusions, and discusses the regulatory significance of the areas where corrective actions have been identified. We would like to clarify what we believe to be an important distinction regarding our discussion of corrective actions. Throughout the report, Boston Edison identifies actions that are underway to revise plans or procedures, provide equipment, or otherwise continue the ongoing planning process. These actions can be categorized as follows:

- Enhancements - The majority of the actions are being taken as part of the ongoing effort to maintain and update the offsite program, or as enhancements to that program. These actions are not identified as "corrective actions" because they are not remedial in nature.
- Corrective Actions - Those actions that are remedial in nature are corrective actions. A good example of such a corrective action is additional training or other measures needed in order to respond to FEMA-identified ARCAs from the October 1989 exercise.

Finally, before providing our specific responses, two fundamental points warrant particular emphasis. First, some persons have suggested that Boston Edison has provided erroneous information to the NRC Staff. We object to those statements in the strongest possible terms. Boston Edison takes its obligation to provide complete and accurate information to the NRC very seriously. When information is provided by the Company, it is reviewed very carefully to assure that it represents our best understanding of the facts. Information regarding the offsite emergency

response program which we have provided to the NRC at its request has been complete and accurate. In a September 26, 1990 letter to Ms. Alba Thompson, former Chairman of the Plymouth Board of Selectmen, we have responded to some of those statements and shown that they are in error. A copy of that letter is attached to our response to Item Tr-14.

Second, some have also suggested that Boston Edison is not an appropriate source of information on offsite emergency planning issues. Such statements fail to recognize the fundamental contribution that Boston Edison has made in improving the status of offsite emergency preparedness over the last several years. While we have recognized that the offsite program is the legal responsibility of offsite officials, we do have legitimate, informed views on relevant planning issues and on the overall state of the offsite program. We have committed a dedicated staff of professional emergency planners to assist in improving the offsite program. We have played a very significant role in the formulation of plans and procedures and developing and implementing training materials. We have spent millions of dollars on supporting the offsite program, including provision to the Commonwealth and local governments of costly emergency facility renovations and equipment.

Our professional planning staff is an excellent, knowledgeable and reliable source of information on planning issues. The Company's views are an important source of information that should be considered by the regulatory agencies, along with the views of responsible and knowledgeable Commonwealth and local officials. While we do not speak on behalf of those officials, we do meet our regulatory and corporate responsibilities to provide the most accurate information available to the regulatory agencies.

LIST OF ENCLOSURES

Enclosure A - Listing of Acronyms

Enclosure B - Listing of Transcript Items by Subject Area

Enclosure C - Listing of Transcript Attachments

Enclosure D - Listing of Items Identified for Corrective Action

Enclosure A

Listing of Acronyms

ACP Access Control Point
AP Administrative Procedure (offsite)
ARC American Red Cross
ARCA Area Requiring Corrective Action
ARFI Area Recommended for Improvement

BECo Boston Edison Company
BECCOS Boston Edison Community Offsite Notification System

CB Citizen's Band
CCC Congregate Care Centers
CDV Civil Defense Variac (Meter)
CFR Code of Federal Regulations
CJTC Criminal Justice Training Center
CPM Counts Per Minute

DNN Digital Notification Network
DPW Department of Public Works
DTV Direct Torus Vent

EAL Emergency Action Levels
EBS Emergency Broadcast System
ECL Emergency Classification Level
EETC Environmental Emergency Team Coordinator
EMS Emergency Medical Systems
EOC Emergency Operations Center
EOF Emergency Operations Facility
EP-AD Emergency Preparedness Administrative Procedure (onsite)
EPZ Emergency Planning Zone
ERO Emergency Response Organization
ETE Evacuation Time Estimate
EWMDS Emergency Worker Monitoring and Decontamination Station

FEMA Federal Emergency Management Agency

HOC House of Corrections

IP Implementing Procedure

JCAH Joint Commission on Accreditation of Hospital

KI Potassium Iodide

LOA Letter of Agreement

Enclosure A

MBTA Massachusetts Bay Transportation Authority
MCDA Massachusetts Civil Defense Agency
MCI Massachusetts Correctional Institution
MDPH Massachusetts Department of Public Health
MDPW Massachusetts Department of Public Works

NIAT Nuclear Incident Assessment Team
NRC Nuclear Regulatory Commission

OEP Office of Emergency Preparedness
OHA Massachusetts Office of Handicapped Affairs

PAC Pilgrim Area Collaborative
PAD Protective Action Directive
PAR Protective Action Recommendation
PI Planning Issue
PIB Public Information Brochure
PIO Public Information Officer
PNPS Pilgrim Nuclear Power Station

RACES Radio Amateur Communications Emergency Services
REA Radiological Emergency Area
RERP Radiological Emergency Response Plan
RMT Radiation Monitoring Team
RO Radiological Officer

SIR Self-Initiated Review (by FEMA)

TCP Traffic Control Point
TDD Telecommunications Device for the Deaf
TLD Thermo-Luminescent Dosimeter
TSA Transportation Staging Area

YAEL Yankee Atomic Environmental Laboratory

Enclosure B

Listing of Public Meeting Items by Subject Area

<u>Subject</u>	<u>Item Number</u>
Saquish/Gurnet planning	4, 32-33, 42, 56-63, 73-74, 132
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Enclosure B

<u>Subject</u>	<u>Item Number</u>
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Carver EWMDS manpower	64
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Environmental monitoring	81, 135
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Boston Edison assistance	89
Kingston equipment	107
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Miscellaneous	66, 112, 155, 161

Enclosure C

Listing of Public Meeting Transcript Attachments

<u>Attachment</u>	<u>Description</u>	<u>Date</u>
1	Overview Report of 7/20/90 Wellesley Reception Center Tour by Jane A. Fleming (RERSC) (2 pgs.)	--
2	Letter from Thomas Vetra (CURE) to Neil Johnson (Duxbury Radiological Response Committee) re: questions and concerns on status of Wellesley Reception Center (6 pgs.)	7/26/90
3	Information re: Bus availability in the EPZ (3 pgs.)	--
4	Transportation Resource Data Sheets (32 pgs.)	11/89
5	Letter from Donald G. Kennedy (Duxbury, Superintendent of Schools) to Frederick J. Tirrell (Needham, Superintendent of Schools) re: summary of meeting concerning possibility of Needham to be host school. (2 pgs.)	5/7/90
6	Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA (18 pgs.)	--
7	Pilgrim Direct Torus Vent - Presented to: Massachusetts Sub- Committee on Energy by David C. Dixon (26 pgs.)	2/27/90
8	Letter from Thomas C. Elsasser (Technical Asst. to NRC Chairman Carr) to Jane A. Fleming re: response to 10/12/89 meeting between Carr & Fleming (3 pgs.)	11/13/89

Enclosure C

<u>Attachment</u>	<u>Description</u>	<u>Date</u>
9	Appointment of Jane Fleming to Duxbury Radiological Emergency Response Plan Committee (RERPC) (1 pg.)	6/11/90
10	Statement of the Nuclear Affairs Committee of the Town of Duxbury signed by J.B. Lampert (9 pgs.)	--
11	Statement of Alba Thompson, Selectman; Town of Plymouth, MA. for the Board of Selectmen (21 pgs.)	9/6/90
12	Letter from Richard L. Katzenstein to Marie Miller (NRC Region I) re: urges that evacuation plans not be a criteria for nuclear power plant operation. (1 pg.)	8/25/90
13	Letter from Margaret H. Saunders re: discouraged & alarmed that no adequate evacuation plan is in place (1 pg.)	9/6/90
14	Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process. (38 pgs.)	9/6/90
15	Letter from Jane A. Fleming to A. Randy Blough & T. T. Martin (NRC Region I) re: written testimony for the public meeting concerning previous allegation (7 pgs.)	9/6/90
16	Same as Attachment 11	
17	Same as Attachment 1	
18	Same as Attachment 2	
19	Same as Attachment 3	
20	Same as Attachment 4	
21	Same as Attachment 5	

Enclosure C

<u>Attachment</u>	<u>Description</u>	<u>Date</u>
22	Same as Attachment 6	
23	Same as Attachment 7	
24	Same as Attachment 8	
25	Same as Attachment 15	
26	Letter from Edward Kergharowin to Ms. Miller re: expresses concerns on nuclear power (1 pg.)	--
27	Letter from Lawrence S. Cole to Ms. Miller (NRC Region I) re: expresses concerns on emergency preparedness, environmental considerations (1 pg.)	8/30/90
28	Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant Plymouth, Massachusetts October 12-13, 1989" by the Massachusetts Civil Defense Agency and Office of Emergency Preparedness	7/16/90

Enclosure D

Listing of Items Identified for Corrective Action

Tr-10	Tr-A14-2	Ex-4	Ex-44
Tr-26	Tr-A14-9	Ex-7	Ex-45
Tr-31	Tr-A28-3	Ex-8	Ex-46
Tr-48		Ex-9	Ex-47
Tr-84		Ex-10	Ex-48
Tr-90		Ex-11	Ex-49
Tr-100		Ex-12	Ex-50
Tr-108		Ex-13	Ex-51
		Ex-14	Ex-52
		Ex-15	Ex-53
		Ex-16	Ex-54
		Ex-17	Ex-56
		Ex-18	Ex-57
		Ex-19	Ex-58
		Ex-21	Ex-59
		Ex-22	Ex-60
		Ex-23	Ex-61
		Ex-24	Ex-62
		Ex-25	Ex-64
		Ex-28	Ex-65
		Ex-29	Ex-66
		Ex-31	Ex-67
		Ex-32	Ex-68
		Ex-33	Ex-69
		Ex-34	Ex-70
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		Ex-39	Ex-75
		Ex-40	Ex-76
		Ex-41	Ex-78
		Ex-42	Ex-79
		Ex-43	Ex-80

II. RESPONSES TO PUBLIC MEETING TRANSCRIPT ITEMS

Item No. Tr-1: "Our [MCDA] latest evaluation of emergency preparedness is found held in October 1989 to which I draw your attention and which I hope you will give your strongest consideration. Our July 16 report [Attachment 28 to the Transcript] raises several issues which must be resolved through our cooperative planning process."

Source: September 6, 1990, Public Meeting Tr. p. 17

Boston Edison Response:

This item references the comments of the Massachusetts Civil Defense Agency (MCDA) on the Federal Emergency Management Agency (FEMA) draft exercise report, which has been superceded by its final exercise report. The MCDA July 16 report, p. 9, states that the remedial exercise had "highly successful results". To the extent that MCDA's July 16 report identifies the same or similar matters identified by FEMA in its final report on the October 1989 exercise, those matters are addressed by Boston Edison in Section IV of this report. To the extent that MCDA's July 16 report identifies new or different matters not raised in FEMA's final report, each of those matters has been designated as Item Tr-A28-[number]. Boston Edison's Response to each of these numbered items is contained in Section III of this report.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-2: "While the special needs self-identification program is underway, it is not complete."

Source: September 6, 1990, Public Meeting Tr. pp. 18-19

Boston Edison Response:

During the week of September 24, 1990, an enhanced special needs survey was mailed to the residents of the Pilgrim Emergency Planning Zone (EPZ) to enable individuals with special needs to identify themselves. A copy of this survey is attached. As discussed below, the survey represents an enhancement to the existing program.

The existing special needs program for the Pilgrim EPZ consists of two parts. The first part applies to the estimated number of individuals who may have special needs (including those individuals who have not been specifically pre-identified). The second part applies to individuals who have been specifically identified as having special needs. Each of these is discussed below.

Estimated Special Needs Population

For the estimated special needs population, the emergency program for Pilgrim consists of three parts: 1) estimating the number of people within the special needs population; 2) providing resources sufficient to meet the needs of these people, including transportation resources; 3) notifying the public of the existence of special needs officials who may be contacted during an emergency and who can arrange for special assistance for individuals with special needs. See, e.g., Town of Plymouth IP-12 (Draft-7, June 27, 1990), entitled "Special Needs Officer"; Town of Kingston AP-05 (Draft-01, September 1990), entitled "Special Needs Program Maintenance" (under review by all EPZ Towns).

Estimates of the special needs population are currently based upon a 1989 state-of-the-art study by the consulting firm of Chadwick, Martin and Bailey

Item No. Tr-2: (cont.)

entitled "Study on Special Needs for Planning Resources in the Pilgrim EPZ". This study (which was co-sponsored by MCDA, Massachusetts Office of Handicapped Affairs (OHA) and Boston Edison) encompassed 5000 households (or about one out of every six households) within the Pilgrim EPZ. The purpose of the study was to estimate the number of people who might require assistance by emergency response personnel in the event of an emergency at Pilgrim. The results of the study varied depending upon the special need in question. The results were also dependent upon whether the individual in question had dependable assistance at home and therefore would not need outside assistance from emergency response personnel. For example, the study found that:

- 10.7% of the households had a member with some degree of hearing loss, but only 0.5% had a member with a severe hearing loss and might require special notification either from family or friends or from emergency response personnel.
- 4.0% of the households reported someone with a physical or mental disability who might require special notification, but only 2.3% would need outside notification by emergency response personnel.
- 2.1% of the households had a special need for transportation during an emergency, including 106 households that would need a wheelchair van and 27 households that would need an ambulance.

Emergency plans, procedures and resources have been developed based upon the estimated number of special needs individuals who might need outside assistance by emergency response personnel in the event of an emergency. For

Item No. Tr-2: (cont.)

example, 14 buses, 19 lift vans and 16 ambulances have been assigned to provide transportation for special needs individuals who do not have their own means of transportation. These transportation resources are more than sufficient, based upon an estimated occupancy of 45 adults per bus, 6 persons per lift van, 2 persons per ambulance and a conservative assumption of one trip per vehicle.

Identified Special Needs Population

For individuals with a special need, the emergency program for Pilgrim consists of two parts: 1) requesting individuals with special needs to identify themselves; 2) having designated special needs officials contact the identified individuals during an emergency to determine whether they need assistance and arrange to provide such assistance. See, e.g., Town of Plymouth IP-12 (Draft-7, June 27, 1990), entitled "Special Needs Officers"; Town of Kingston AP-05 (Draft-01, September 1990), entitled "Special Needs Program Maintenance".

Several different methods have been utilized to encourage individuals with special needs in the Pilgrim EPZ to identify themselves. These methods have included: 1) advertisements in local newspapers in 1987 requesting special needs individuals to identify themselves to local Civil Defense agencies; and 2) the 1989 Public Information Brochure (PIB), which included a detachable, pre-addressed mail-in card for self-identification of special needs individuals; and 3) the 1990 enhanced special needs survey referenced in Item Tr-12. Response to Item Tr-12 provides a more detailed description of this survey, which was initiated in response to the study reflected in the Chadwick, Martin and Bailey report.

Item No. Tr-2: (cont.)

In summary, completion of the 1990 enhanced special needs survey is not necessary for adequate emergency planning for the special needs population. Instead, this survey only represents an additional and improved method for EPZ town officials to identify special needs individuals.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

RESPONSE FORM
SPECIAL NEEDS SELF-IDENTIFICATION PROGRAM

All information will be kept confidential by public safety officials. If you need help filling out this form, please call the telephone number at the bottom of the Selectmen's letter.

YES NO

- A. 1) Do you or does someone in your household have a hearing loss that would make it unlikely to hear warning sirens, a broadcast from official vehicles, or emergency information on radio or television in the event of a public emergency? ___ ___
- 2) Does this person use or need special equipment such as a Telecommunications Device for the Deaf (TDD/TTY)? ___ ___
- B. Do you or does someone in your household need help to shelter-in-place; that is, to close doors, windows or vents? ___ ___
- C. If evacuation is directed, would you or anyone in your household need outside help to get ready to evacuate? ___ ___
- D. If you or other household members need a ride to leave the area, are you or they unable to walk about 1/2 mile to an emergency bus route? ___ ___
- E. If you must be away from home a day or more, would you or someone in your household need help with medical equipment or supplies, prescription drugs or a medically prescribed diet? ___ ___
- F. Would a family member with any other type of physical, mental or emotional disability need special help with any of the actions listed above? ___ ___

If you answered "yes" to any question above and would not always have someone around to help you, please return this questionnaire in the stamped envelope enclosed with this mailing. Someone from your local Civil Defense Agency will contact you for more information.

Name: _____

Address: _____

Town: _____ State: _____ Zip Code: _____

Number of persons in household: _____

Telephone numbers: Home: _____ Work: _____

TDD/TTY Number: _____

If you do not have a telephone, how may we reach you? _____

Item No. Tr-3: "Necessary alterations to the siren activation system which were identified by FEMA after the October 1989 exercise are presently under consideration."

Source: September 6, 1990, Public Meeting Tr. p. 19

Boston Edison Response:

The alterations referenced in this item involve provision of equipment and software modifications which will enable the State Police at Middleborough to directly activate EPZ sirens. Boston Edison has received proposals for the conduct of this work and is presently evaluating those proposals. This enhancement is scheduled for completion next year.

The item alleges no program inadequacy since the towns currently have this capability. The comment made on page 43 of the draft FEMA exercise report (dated May 1990) stated, "In addition to the towns' capability to activate sirens, it is recommended that the State should also have this capability." The statement in no way implies it is a "necessary alteration". As a matter of fact, FEMA eliminated this comment from the final exercise report since the applicable objectives were successfully demonstrated during the May 1990 remedial exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-4: "Arrangements and equipment for evacuation of the Saquish-Gurnet area are yet to be made final."

Source: September 6, 1990, Public Meeting Tr. p. 19

Boston Edison Response:

Emergency procedures applicable to the Saquish-Gurnet area have been drafted. See Town of Plymouth IP-15 (Draft-2, June 29, 1990), entitled "Gurnet/Saquish Association". The Saquish-Gurnet Association has given conditional approval to these procedures, subject to upgrading of the access road to Saquish Neck and to having the Saquish-Gurnet Association emergency personnel interface with Duxbury rather than Plymouth. As discussed in Responses to Items Tr-57 and Tr-58, completion of these conditions is not necessary for the safe evacuation of the Saquish-Gurnet population in the event of an emergency.

In summary, the emergency procedures include the following arrangements for evacuation of the Saquish-Gurnet population: 1) Saquish-Gurnet and Duxbury Beach has its own subarea designation (subarea 4); 2) the Saquish-Gurnet Association is notified at the "ALERT" stage with the recommendation for precautionary closure; 3) in addition to warnings by siren, warnings to evacuate are provided by the Saquish-Gurnet Deputy Civil Defense Directors during route alerting; 4) the Saquish-Gurnet population has a designated evacuation route; and 5) the Saquish-Gurnet population has a designated reception center. See, e.g., Town of Plymouth IP-15 (Draft-2, June 29, 1990), entitled "Gurnet/Saquish Association"; Town of Duxbury IP-15 (Draft-5, April 2, 1990), entitled "Conservation Department", p. 12; Evacuation Time Estimate and Traffic Management Plan, Rev. 1 (July 15, 1989) p. J-2.

Necessary equipment is in place for the Saquish-Gurnet area. For example, Boston Edison has supplied communications equipment for use by the

Item N., Tr-4: (cont.)

Saquish-Gurnet Association, including two portable VHF marine radios with microphones, speakers and charging units, two pagers on the Town of Plymouth paging system, and two route alert kits consisting of two bullhorns, two flashlights, and writing materials. Boston Edison has also supplied a warning sign and a four-wheel drive vehicle for use in the Saquish-Gurnet area. This equipment is sufficient to enable the Saquish-Gurnet Association to perform its responsibilities under Plymouth IP-15. Additionally, two warning sirens are located in the Saquish-Gurnet area which have speakers for public address capabilities. In addition, Boston Edison provides two year round residents of Saquish with a stipend of \$1,000 per person per year to compensate them for acting as Deputy Civil Defense Directors - Town of Plymouth. Under Plymouth IP-15, these individuals are primarily responsible for performing route alerting, communicating with the Plymouth Harbormaster, and notifying Saquish-Gurnet residents.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-5: "Detailed plans for host schools to protect children from Duxbury and Marshfield have yet to be completed."

Source: September 6, 1990, Public Meeting Tr. p. 19

Boston Edison Response:

According to Commonwealth procedures, if an emergency were to occur at Pilgrim which necessitated the transfer of Duxbury and Marshfield students to host schools, MCDA would currently accomplish this task through the use of an "Executive Order Declaring a State of Emergency and Concerning the Use of Public Facilities to Support Emergency Response to an Accident at Pilgrim Nuclear Power Station". When the Governor declares a state of emergency, host schools can be made available for the temporary sheltering of school children through the use of the Executive Order. A copy of the Executive Order is provided in the MCDA Technical Hazards Officer's Implementing Procedure, IP-18 (Draft-03, August 27, 1990), entitled "MCDA Technical Hazards Officer", and it is the Technical Hazards Officer's job to incorporate the names of the host schools for Duxbury and Marshfield into the Executive Order. In addition, by procedure, MCDA IP-01 (Draft-6, July 9, 1990), entitled "MCDA Director" the MCDA Director ensures that the host schools for Duxbury and Marshfield have been incorporated into the Executive Order.

Next, by procedure, "MCDA Operations Officer" IP-03 (Draft-06, August 9, 1990), the Executive Order (with the host schools for Duxbury and Marshfield identified) is telecopied to the Area II Director, with copies forwarded to the Public Affairs Officer, the Emergency Operations Facility and Wellesley Emergency Operations Center (EOC) Emergency Response Coordinator (Director) IP-02 (Draft-2, June 26, 1990), entitled "EOC Management". By procedure, the MCDA Public Affairs Officer develops an Emergency Broadcast System (EBS) message for the Director's approval, which would include, among other things,

Item No. Tr-5: (cont.)

the identified host schools for Duxbury and Marshfield. See MCDA IP-12 (Draft-04, May 14, 1990), entitled "MCDA Public Affairs Officer". Currently, in that same procedure, the Commonwealth's Criminal Justice Training Council (CJTC) IP-19 (Draft-3, June 26, 1990), entitled "Massachusetts Department of Education Host School/Mass Care Wellesley DPW Facility") is identified in the listing of host schools for Duxbury and Marshfield. In addition to the EBS message, parents of Duxbury and Marshfield students may also receive information about the location of their children at the CJTC.

The Area II Director, provides to the Area II Special Facilities Coordinator, the Declaration of the State of Emergency/Executive Order, including the names of the host schools and their locations. The Duxbury and Marshfield School Department procedures provide that students should be transferred to the CJTC. IP-06 (Draft-9, May 21, 1990), entitled "Duxbury School Department"; IP-06 (Draft-0, August 29, 1989), entitled "Marshfield School Department". Also, by procedure, the Area II Special Facilities Coordinator, IP-08 (Draft-5, May 10, 1990), entitled "Area II Special Facilities Coordinator", provides the names of the host schools and their locations to the Marshfield School Superintendent (EOC Rep.), the Duxbury School Superintendent (EOC Rep.), and the Department of Education (EOC Rep.) at Wellesley. As discussed in Response to Item Tr-153, the Commonwealth successfully demonstrated its ability to implement the Executive Order and designate host schools for Marshfield and Duxbury during the May 1990 remedial exercise. However, one ARCA was identified.

In the near future, the Executive Order will no longer be used to designate host schools for Duxbury and Marshfield because those particular towns have recently identified host schools for their children. The Needham

Item No. Tr-5: (cont.)

High School has been identified as the host school for Duxbury and the Furnace Brook School in Marshfield has been identified as the host school for the one school in Marshfield inside the EPZ which would be evacuated. Draft procedures for Marshfield reflecting this change have been developed and are in the hands of the Marshfield Civil Defense Director and the School Superintendent for review. Town of Marshfield IP-06 (Draft-2, September 6, 1990), entitled "School Department". Graphics and maps with instructions to support the revised IP have also been prepared and are in the hands of the Marshfield Civil Defense Director and School Superintendent for review. A Boston Edison planner has also been informed by a Marshfield town official that the procedure has been forwarded to the MCDA for review. It should be noted that the use of the Furnace Brook School, as the host school for Marshfield currently is being questioned by the MCDA staff.

In Duxbury, a revised school IP has been prepared and as of September 21, 1990 was in the hands of the Duxbury School Superintendent and Civil Defense Director for review. Town of Duxbury IP-06 (Draft-9, September 21, 1990), entitled "School Department". Graphics and maps with instructions to support the revised IP have also been prepared and are in the hands of the Duxbury School Superintendent and the Civil Defense Director for review. Additionally, Wellesley procedures have been revised to include, for Needham School officials, an appropriate checklist for Needham High School. IP-19 (Draft-4, September 24, 1990), entitled "Massachusetts Department of Education Host School/Mass Care Wellesley DPW Facility". This revised procedure is in the hands of appropriate Needham officials for review. An October 11, 1990

Item No. Tr-5: (cont.)

meeting has also been scheduled with the Needham Business Manager to finalize Needham's role as a host school community.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-6: "As a first step, testimony regarding the special needs citizens in the communities near the plant should be comprehensively addressed by the NRC staff."

Source: September 6, 1990, Public Meeting Tr. p. 24

Boston Edison Response:

This item does not itself identify any deficiency. We have provided specific responses to each substantive item related to special needs identified in the September 6th public meeting transcript and attachments. See Responses to Items Tr-2, Tr-7, Tr-8 and Tr-12.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-7: "The NRC has requested an update on emergency planning for people with needs living in the EPZ for Pilgrim Station. For the elderly and disabled, the FEMA deficiencies of 1987 remain unchanged today."

Source: September 6, 1990, Public Meeting Tr. p. 32

Boston Edison Response:

In 1987, FEMA identified the need for more detailed planning for the special needs population. Since that time, the following progress has been achieved:

- (1) Specific plans and procedures have been developed which provide a detailed program for protection of the special needs population in the Pilgrim EPZ. These plans and procedures specify responsibilities and assign specific tasks to provide for the identification of and assistance to persons with special needs. See, e.g., Town of Plymouth IP-12 (Draft-7, June 27, 1990), entitled "Special Needs Officer"; Town of Kingston AP-05 (Draft-01, September 1990), entitled "Special Needs Program Maintenance" (in review by all EPZ towns); Town of Plymouth RERP (Draft-9, May 18, 1990), pp. II-E-7, II-G-5, II-J-12 to 14.
- (2) Individuals have been assigned responsibility as Special Needs Officers. See, e.g., Town of Kingston IP-02 (Draft-6, May 10, 1990), entitled "Civil Defense Agency" p. 25. Training has been provided to these individuals. See, e.g., "Offsite Emergency Preparedness Training", Module 3: EOC Staff Lesson Plan 3-7K, "Special Needs" (April 12, 1990) and applicable training records.
- (3) Programs have been implemented to verify the size and needs of the special needs population and to enable such persons to identify themselves in advance of and during an emergency. These include: a) the Commonwealth's 1989 Public Information Brochure (PIB); b) the 1989 PIB detachable self-addressed card; c) the Chadwick, Martin, and

Item No. Tr-7: (cont.)

Bailey study of the Pilgrim EPZ special needs population; d) the enhanced special needs survey now being implemented (see Response to Item Tr-12); e) the 1990 enhanced special needs survey, letters, posters and newsletter inserts mailed to local, regional, and state human services agencies; f) cassette tapes outlining the 1990 enhanced special needs survey and designed for use by sight-impaired persons delivered to the area Talking Information Center, local libraries, and EPZ senior citizen communities; and g) advertisements in local newspapers in 1987 requesting special needs persons to identify themselves to local Civil Defense agencies.

- (4) Transportation providers have signed Letters of Agreement (LOAs) to provide transportation resources in an emergency; in total, these resources exceed estimated needs. See Response to Item Tr-2.
- (5) Fifty-five Telecommunications Devices for the Deaf (TDDs) have been provided to the local Civil Defense Directors, 22 of which have been distributed to the general population to date. Additionally, five TDDs are in the EPZ town EOCs and five TDDs are at the EPZ town 24-hour warning points.
- (6) Interim training was approved by MCDA and conducted in EPZ towns on the draft administrative procedure designed to help town officials maintain the special needs program.
- (7) Special needs objectives were successfully demonstrated by the towns in the October 1989 exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-8:

"The special needs population has not even been identified in any real sense. Today in Plymouth, only 1 percent of the population with special needs has been identified. Only 17 additional people have been identified since 1987.

As you are well aware, the United States census survey entitled "U.S. Disability, Functional Limitation and Health Insurance Coverage" shows 18.2 percent of the population has disabilities and functional limitations. Updated figures extrapolated from Massachusetts actually show that figure has raised to 20 percent in 1990."

Source: September 6, 1990, Public Meeting Tr. pp. 32-33

Boston Edison Response:

For an emergency at Pilgrim, the special needs population is a subset of the population with disabilities and functional limitations. The special needs population consists of persons who:

- 1) Have a disability or functional limitation; and
- 2) Cannot receive or understand an emergency instruction and/or cannot take recommended protective actions on their own; and
- 3) Do not have a relative, friend, or neighbor who would provide assistance during an emergency.

The disabilities and functional limitations included in the United States Census survey entitled "Disability, Functional Limitation, and Health Insurance Coverage", hereinafter referred to as "the Census survey," are broad-sweeping. Many of the limitations listed do not correlate to an ability to receive or understand an emergency instruction or to take a recommended protective action. For example, functional limitations and disabilities in the Census survey include: any difficulty seeing ordinary newspaper print, having one's speech understood, or lifting 10 pounds. These limitations and disabilities need not be considered when making estimates of the special needs population for emergency planning purposes. Consequently, to the extent that the Census survey estimates that 18 to 20 percent of the population as a whole

Item No. Tr-8: (cont.)

may have a disability or functional limitation, is not relevant to an estimate of the special needs population in the Pilgrim EPZ.

However, some of the information in the Census survey may be relevant to the extent that it relates to the subgroup of individuals with disabilities or functional limitations which would qualify as a special need for emergency planning purposes. For example, planning for transportation assistance for the mobility impaired is based upon the estimated population who cannot walk about 1/2 mile to a pickup location. The Census survey indicates that 4.4% of the residential population is not able to walk 1/4 mile. After factoring in those individuals who have dependable transportation available to them, one would expect that significantly less than 4.4% of the residential population would need special transportation pickup at their homes. Similarly, one would expect that significantly less than 0.3% of the residential population (those unable to hear normal conversation according to the Census survey) would need special notification.

As discussed in Response to Item Tr-2, reasonable estimates of the magnitude of the special needs population specific to the Pilgrim EPZ have been identified. These estimates were based upon a state-of-the-art study performed by Chadwick, Martin, and Bailey. This study provided estimates of the number of people within various types of special needs categories. For most of the study's categories, less than 2 1/2 percent of the population was

Item No. Tr-8: (cont.)

designated as having a special need as it would relate to a protective action in the Pilgrim EPZ. The emergency plans and procedures for Pilgrim are based upon these EPZ-specific estimates, rather than the 18% to 20% figure noted in the national Census survey.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-9: "Currently, there is not enough transportation for even the 1 percent of the [Plymouth Special Needs] population, and there are no signed contracts for the drivers."

Source: September 6, 1990, Public Meeting Tr. p. 33

Boston Edison Response:

As discussed in Response to Item Tr-117, overall there are sufficient transportation resources under LOA even when considered against very conservative planning assumptions (e.g., all schools and day care centers are in session, all students and staff of the schools and centers are present, all students and staff would ride evacuation buses and would not be picked-up by parents or friends, all subareas in the EPZ would be evacuated at the same time, and each vehicle would make only one trip, i.e. "one-lift"). In particular, the Response to Item Tr-2 shows that there are sufficient transportation resources for special needs individuals requiring transportation during an emergency.

With respect to signed contracts with drivers, there is no regulatory requirement to provide such contracts. See, e.g., NUREG-0654, Rev. 1, II.A.3 (which requires agreements only with "support organizations", not with individuals). See also Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), Memorandum and Order, slip op. at 18-19 (May 18, 1987); Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), LBP-88-32, 28 NRC 667, 673 (1988).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-10: "Disabled residents who may somehow reach the reception decontamination centers will find that they will not be able to be decontaminated along with the general population."

Source: September 6, 1990, Public Meeting Tr. p. 33

Boston Edison Response:

The emergency plans and procedures for Pilgrim are designed to provide special services to the handicapped. Special handicapped monitoring stations are set up at each reception center. Handicapped individuals found to be contaminated would be referred to a medical facility where personnel better qualified to meet their special needs are available. See, e.g., Wellesley RERP (Draft-1, August 8, 1990), pp. 59-60; Wellesley EOC IP-05 (Draft-3, June 26, 1990), entitled "Wellesley Reception Center", diagram of Personnel Facility. In addition, the Reception Center Medical Support procedure directs personnel to provide and coordinate transportation for persons requiring attention at a medical facility. However, the Reception Center Support procedure currently does not call out the specific steps taken for handicapped individuals who may be contaminated. (See Corrective Action below.) See, e.g., Wellesley Procedure IP-16 (Draft-3, June 26, 1990), entitled "Reception Center Medical Support". Homebound special needs individuals provided with emergency ambulance transportation assistance would be transferred directly to host health care facilities, where monitoring and decontamination services are available, in addition to more specialized medical services. See, e.g., Town of Plymouth IP-12 (Draft-7, June 27, 1990), entitled "Special Needs Officer", section 8.

CORRECTIVE ACTIONS:

Boston Edison will work with reception center communities to assess revising the Reception Center Medical Support procedure to clarify the tasks regarding assessing contaminated handicapped personnel needs and preparing the contaminated handicapped personnel for transport to a medical facility.

SCHEDULE FOR COMPLETION:

December 1990

Item No. Tr-11:

"The plans now are for the disabled to go from the reception centers to one of the thirteen hospitals designated to treat contaminated injured people in the hopes that they will be able to decontaminate the disabled.

However, each of these hospitals is only capable of handling two or three contaminated injured people in 12 hours. And all thirteen hospitals can only handle 39 people in a 12-hour period. The result seems clear: the disabled who may get themselves to reception centers, the residents who need the most help and will be the most traumatized, will find that they won't be allowed in with the general population. They will be separated from their families and will be on their own to find a hospital to decontaminate them."

Source: September 6, 1990, Public Meeting Tr. pp. 33-34

Boston Edison Response:

Several misconceptions stated in this item must be clarified. They are:

- (1) A "contaminated handicapped" person does not equate to a "contaminated injured" person.

Contaminated injured persons, as defined by FEMA Guidance Memorandum MS-1, means: 1) contaminated and otherwise physically injured; 2) contaminated and exposed to dangerous levels of radiation; or 3) exposed to dangerous levels of radiation.

Handicapped persons who are also contaminated will not necessarily be injured and will not necessarily require prompt life threatening medical attention. Requirements for testing contaminated injured persons, handicapped or otherwise, are contained in FEMA Guidance Memorandum MS-1. As explained in detail in Response to Item Tr-47, the Pilgrim offsite emergency preparedness program far exceeds federal guidance, with eleven hospitals under agreement to provide decontamination of contaminated injured persons.

Item No. Tr-11: (cont.)

- (2) There is no twelve hour time requirement for decontamination.

FEMA's Krimm Memoranda established a twelve hour criterion for the monitoring and registering of evacuees, not decontamination.

Memorandum from Richard W. Krimm (FEMA) to NTH Division Chiefs (December 24, 1985); Memorandum from Richard W. Krimm (FEMA) to Frank Begly (January 5, 1988).

- (3) Estimates of the time needed to handle contaminated injured persons requiring prompt medical attention are not relevant to the length of time needed to handle contaminated handicapped persons.

No basis has been provided for the "39 people in 12 hours" statement in this allegation. Nor does that estimate at all reflect on the time needed to decontaminate handicapped persons who may need such services. See also Response to Item Tr-10. For the reasons mentioned above, we believe this statement inaccurate.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-12: *The upcoming enhanced special needs survey, paid for by Boston Edison, will be mailed out later this month...

This survey, like past surveys, omits any questions relating to people with vision impairments, for frail elderly residents who would need assistance, or the status of children either disabled or latch-key children. Also omitted is information for people with language barriers or people with low comprehension skills."

Source: September 6, 1990, Public Meeting Tr. p. 34

Boston Edison Response:

The 1990 enhanced special needs survey was initiated in response to the Chadwick, Martin and Bailey study. See Response to Item Tr-2. The survey was co-sponsored by and reflects the input of the Massachusetts Office of Handicapped Affairs. The survey is not meant to classify individuals by type of impairment, but instead to determine their ability to perform a required emergency action.

Health surveys generally request information regarding an individual's ability to perform certain activities. This format allows trained survey staff to more accurately analyze survey results to determine the prevalence of individuals with functional limitations. In general, such surveys do not request that individuals decide whether and where they fit on a list of special needs categories, because different individuals may interpret the categories differently. Also, by asking questions about the ability of individuals to perform certain actions, surveys avoid inadvertently overlooking special needs individuals who do not fit into common categories. For example, asking whether someone is unable to walk about a 1/2 mile to an emergency bus route is more useful and informative than attempting to determine whether he or she is frail, elderly, or mobility-impaired, which are imprecise terms. Consequently, for the purpose of taking emergency response measures, it is not the classification that matters, but the ability to take a prescribed action.

Item No. Tr-12: (cont.)

The enhanced special needs survey for the Pilgrim EPZ is consistent with the U.S. Census Bureau's survey for determining the prevalence of functional limitations among the non-institutional population. The Census survey entitled "Disability, Functional Limitation, and Health Insurance Coverage", for example, contains performance questions such as the ability to see words and letters in ordinary newspaper print, to walk up a flight of stairs, and to get into and out of bed. Likewise, the enhanced special needs survey for Pilgrim contains performance questions specific to taking a protective action, such as the ability to walk about a 1/2 mile to an emergency bus route in the event of an evacuation advisory. These emergency performance questions include inquiries applicable to the visually-impaired, frail, elderly and disabled children. See also Response to Item Tr-128 regarding latch-key children.

The enhanced special needs survey for Pilgrim also provides a mechanism for identifying people with language barriers, low comprehension skills, or other limitations in comprehending emergency information. The survey's cover letter requests that a questionnaire be returned for someone who may have trouble understanding emergency information over the radio and television. The survey also seeks volunteers for checking on a neighbor who may not understand a warning siren or emergency news broadcast.

Further identification of each type of disability occurs during the callback process, as types of special needs or special resources are defined in more detail. Commonwealth officials, as part of this year's survey development, have provided the EPZ town Civil Defense Agencies with a "Special Needs Callback Suggestions" checklist to assist them in developing an accurate Special Needs List.

Item No. Tr-12: (cont.)

The enhanced special needs survey, including the survey questions and the callback questions, is described in more detail in the Commonwealth's "Enhanced Special Needs Identification Program" (September 1990), a copy of which is located in the Commonwealth and local civil defense offices.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-13:

"The most controversial part of this new survey [enhanced special needs survey] is the so-called buddy system. According to FEMA, no other state in the country has used this strategy to date. This strategy, according to FEMA memorandum, can be used in states where emergency personnel cannot enter a home. This is not one of those states.

If this system is used,... the state will have abandoned their official responsibility...."

Source: September 6, 1990, Public Meeting Tr. pp. 34-35

Boston Edison Response:

The enhanced special needs survey referenced in this item simply requests that persons who would be willing to volunteer to assist a neighbor or friend or to provide other assistance in an emergency, inform local Civil Defense officials of their willingness to do so. This inquiry was included at the suggestion of Commonwealth officials.

It is not intended to supplant the detailed procedures and considerable resources incorporated into the offsite program or to eliminate the need for any of the emergency workers who have specific detailed responsibilities under the offsite program.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-14: "[I]n that particular report, January 27, 1989, in that particular [Boston Edison] report, it speaks to 'enhancements' being done at the Bridgewater reception center."

Source: September 6, 1990, Public Meeting Tr. p. 47

Boston Edison Response:

This item, coupled with Items Tr-15 through Tr-23, allege that Boston Edison misrepresented the status of planning for the Bridgewater and Taunton reception centers in communications to the NRC in late 1988. That allegation is entirely false as discussed in the attached letter to Ms. Alba Thompson dated September 26, 1990. That letter, and the attached supporting documents, clearly demonstrate that Boston Edison's statements were accurate.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Tr-14

BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

September 26, 1990

Ralph G. Bird
Senior Vice President — Nuclear

The Honorable Alba C. Thompson
Plymouth Board of Selectmen
Town Hall
11 Lincoln Street
Plymouth, MA 02360

Dear Mrs. Thompson:

Since becoming Senior Vice President-Nuclear, I have made every effort to understand and deal responsibly with the concerns of the citizens of the towns in Pilgrim's Emergency Planning Zone. In doing so, considerable Boston Edison resources (more than \$15 million over the past three years) have been expended to identify effective solutions to the real issues and support the various communities in their efforts to address their legitimate emergency preparedness needs. Working with the community officials in this way, many positive improvements have been achieved.

It is from this background of serious and constructive effort to help Pilgrim's neighbors meet their emergency planning responsibilities that I find the tone and content of your testimony at the NRC public meeting on September 6, 1990, particularly disturbing.

At that meeting, which was held to obtain the views of state and local officials and citizens on the current status of offsite emergency planning around Pilgrim Station, you represented the Board of Selectmen of the Town of Plymouth. I am not responding to all of the statements made at the hearing at this time; but, given that your testimony attacked the integrity of Boston Edison Company officials and employees and given your position of responsibility as a Selectman in the town in which Pilgrim resides, I feel compelled to respond directly to you.

At the September 6 meeting, you suggested that a "conspiracy" existed between Boston Edison and the NRC staff and alleged that Company employees "furnished...misleading and sometimes inaccurate information" to the NRC. Tr., pp. 42, 46. Your statement is not true. Boston Edison takes very seriously its legal and moral obligation to provide complete and accurate information to the NRC and other organizations. When information is provided by the Company, it is reviewed very carefully to assure that it represents our best understanding of the facts. Information regarding the offsite emergency response program which we have provided to the NRC at its request has been complete and accurate.

Your testimony pointed to several examples of alleged false information being provided by Boston Edison. In particular, you stated that Boston Edison: (1) in a January 27, 1989 report erroneously identified "enhancements being done" at the Bridgewater reception center which had not yet been done, and (2) falsely testified in October and/or December 1988 that the Bridgewater and Taunton reception centers could perform monitoring and decontamination. Tr. pp. 46-48. In particular, you stated, "That was absolutely untrue testimony on the readiness of the Taunton and Bridgewater reception centers. And, it was received by the NRC and presented as the truth." Tr. p. 49.

The truth is that Boston Edison provided accurate written statements and/or testimony to the NRC on the following four occasions up to and including the January 27, 1989 report referenced in your testimony: (1) our October 4, 1988 "Report on the Status of Offsite Emergency Preparedness Around Pilgrim Nuclear Power Station"; (2) our October 5, 1988 testimony before the NRR staff; (3) our October 14, 1988 Commission meeting testimony; and (4) our January 27, 1989 "Status of Pilgrim Emergency Planning Issues as of January 27, 1989." All of these statements are on the public record. On none of these occasions did we misrepresent the facts.

The attached documents show the facts about reception center enhancements. Boston Edison did not represent that the reception center enhancements had been completed and did not testify that the reception centers were ready for monitoring and decontamination. Our October 14, 1988 testimony before the Commission does not address this issue. Our January 27, 1989 report explicitly stated that enhancements had not yet been made. Our October 4, 1988 report and October 5, 1988 NRR testimony state that the reception centers "would have the capability" of "monitoring the requisite number of persons" with "appropriate improvements and equipment procurement." (Emphasis added.) Furthermore, our October 4 and 5 statements also specify that Boston Edison committed to undertake facility improvements and equipment procurement "as soon as arrangements with the Commonwealth are concluded." Thus, at no time did we represent that enhancements which had yet to be accomplished had been completed or that necessary monitoring or decontamination facilities and equipment had yet been provided.

Secondly, I must also take strong exception to your repeated statements that Boston Edison is not an appropriate source of information on offsite emergency planning issues. In particular, you stated that the Company has "no jurisdiction" over offsite issues and that "[o]nly the towns could have...valid, up-to-date information." Tr. pp. 42, 45-46. These statements fail to recognize the fundamental contribution that Boston Edison has made in improving the status of offsite emergency preparedness over the last several years or our ongoing involvement in the planning process.

We have repeatedly and explicitly acknowledged that the offsite emergency response program belongs to the Commonwealth and local authorities, and not to Boston Edison. When we have been asked to provide information to the NRC, we have explicitly stated that we are not speaking for the towns and are presenting only our own views. You refer to our January 27, 1989 report (and subsequent status reports provided during the power ascension process) as a "pernicious channel which was filled with errors." Tr. p. 46. I must remind you that the January 27, 1989 report was provided to you in draft for comment prior to its submittal, and that the local civil defense directors were provided with subsequent reports at weekly planning meetings.

Furthermore, while we have recognized that the offsite program is the responsibility of offsite officials, we do have information on the outstanding planning issues and on the overall state of the offsite program. We have committed a dedicated staff of professional emergency planners to the task of assisting in improving the offsite program. We have played a very significant role in the formulation of plans and procedures and developing and implementing training materials. We have spent millions of dollars on supporting the offsite program, including provision of costly emergency facility renovations and equipment.

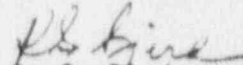
Our professional planning staff is an excellent, knowledgeable, and reliable source of relevant information on planning issues. The Company's views are an important source of information for the regulatory agencies, along with the views of responsible and knowledgeable Commonwealth and local officials. While we do not speak on behalf of those officials, we do meet our regulatory and corporate responsibilities to provide the most accurate information available to the regulatory agencies.

Finally, you stated that Boston Edison "does not mean to continue to assist us under NUREG 0654" with respect to certain specific equipment requests by the Town. Tr. p. 50. This statement creates the misimpression that we are not supporting your off-site program. Boston Edison is providing and will continue to provide extensive resources to the Commonwealth and each of the seven EPZ and reception center towns. Our criterion for providing resources is whether or not a legitimate operational need for the equipment has been demonstrated.

We have discussed these most recent equipment requests with Plymouth officials and explained why some are not necessary to carry out the emergency response plans. We stand by our commitment to provide radios for the use of the Plymouth schools as soon as a suitable vendor is identified and the school committee has signed off on the procedures for which the radio system will be designed. However, we cannot see the emergency planning basis for providing additional four-wheel drive vehicles for the Plymouth Police Department to perform a function assigned by your procedures to the Department of Public Works, or to purchase radios for the lifeguards who have no assignment in your emergency procedures. And finally, we are convinced that there are far more economical, practical solutions to your concerns about police and fire communications than the purchase of a mobile communications van. Given our efforts to date and our long-term commitments, it is unreasonable to claim a lack of support from this Company simply because we do not fund a particular equipment request.

Mrs. Alba Thompson
September 26, 1990
Page Four

In closing, I am greatly disturbed by the implications and allegations in your testimony. As an officer of the Company, I could not ignore those statements. Nevertheless, let me again assure you that we will continue to work actively with and support the efforts of the Town of Plymouth and other towns in the Pilgrim Emergency Planning Zone to improve and maintain their offsite programs. I have attached for your convenience relevant excerpts from the documents which I have referenced in this letter.


R. G. Bird

:caw

Attachment

cc: Kenneth Carr, NRC Chairman
Thomas T. Martin, NRC Regional Administrator
John Macdonald, NRC Senior Resident Inspector
Nuclear Matters Committee
Chairmen, Board of Selectmen
Carver, Duxbury, Kingston, Marshfield, Plymouth
Civil Defense Director Hadfield
MA Secretary of Public Safety
Representative Robert Kraus
Representative Peter Forman
Congressman Gerry Studds
Senator John F. Kerry
Senator Edward M. Kennedy

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of:)
PILGRIM NUCLEAR POWER PLANT)

Pages: 1 through 161
Place: Plymouth, Massachusetts
Date: September 6, 1990

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UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of:)
)
PILGRIM NUCLEAR POWER PLANT)
)

Thursday,
September 6, 1990

Plymouth Sheraton
Plymouth, Massachusetts

The above-entitled matter came on for hearing,
pursuant to notice, at 7:05 p.m.

BEFORE: TIM MARTIN
Regional Administrator
Region 1

NRC STAFF MEMBERS PRESENT:

FRANK CONGEL
Director
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation

JIM SNIEZEK
Deputy Executive Director of Operations

DICK COOPER
Deputy Director
Division of Radiation Safety & Safeguards
Region 1

JOHN ROGGE
Section Chief
Region 1

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(202) 628-4888

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1 still in the hands of the school committee and has yet to be
2 forwarded to the radiological emergency response planning
3 committee for review.

4 Plymouth continues to work with the Commonwealth
5 and Boston Edison to resolve concerns regarding egress from
6 Saquish-Gurnet Beach.

7 Four staff positions are currently vacant in the
8 emergency operation center and recruiting has commenced.

9 Refresher training is continuing.

10 The emergency operations center is fully
11 operational.

12 Plymouth reviewed and commented on the FEMA draft
13 exercise report.

14 That concludes our understanding of the status of
15 Plymouth.

16 MR. MARTIN: I understand representing Plymouth is
17 Ms. Thompson.

18 MS. THOMPSON: I am Alba Thompson, Selectman,
19 speaking for the Board of Selectmen of the Town of Plymouth,
20 America's hometown where it all began.

21 The invitation of the Nuclear Regulatory
22 Commission to attend this meeting for the purpose of
23 obtaining our views regarding the current status of off-site
24 emergency preparedness for the Pilgrim Nuclear Power Station
25 came as a perplexing and not unalloyed joy.

1 Pilgrim has been open since 1972. Eighteen years
2 later, the first area public meeting on our radiological
3 emergency planning is called by the NRC. Given the troubled
4 past history of Plymouth, one wonders why now?

5 A cynical view is that the recent Inspector
6 General's report shows such unsubstantiated, such
7 inconsistent, such inaccurate, such untrue reporting on the
8 status of the Town of Plymouth's planning by NRC staff that
9 some palliative action had to be taken.

10 Why are we here tonight? To pay for all of the
11 outrageous errors that placed our town at risk? NRC staff
12 gave untrue testimony at two hearings in October and
13 December of 1988. The Town of Plymouth sent an angry letter
14 of six pages pointing out the errors made by the staff in
15 that October 1988 meeting, to which Plymouth was not even
16 invited, although the subject was on the emergency off-
17 planning for which the Town of Plymouth was responsible.
18 But Boston Edison was invited.

19 As a result of our vigorous demands and because
20 local authorities responsible for planning had never been
21 consulted nor invited to testify at an NRC meeting on their
22 own plans, the NRC finally invited the officials of the
23 Emergency Planning Zone to the December 1988 meeting. That
24 took place in Rockville, Maryland and we all trooped
25 wearily, making a one-day trip so we wouldn't cause our

1 towns additional costs for hotel rooms.

2 Selectmen and civil defense directors tried to set
3 the record straight. This testimony was immediately
4 followed by NRC staff rebuttal, again presenting information
5 that was incomplete staff work, probably based on input from
6 Boston Edison which had no jurisdiction on off-site
7 planning. Worse, Boston Edison was seeking restart
8 permission having been shut down for two and one half years
9 -- hardly a balanced source.

10 If anyone believes in a conspiracy theory, there
11 is plenty of ammunition in the events of 1988 and 1989. In
12 simple terms, this is what happened: the town officials
13 responsible for radiological planning were not consulted nor
14 believed.

15 The utility company, wishing to go back on line
16 and certainly not an objective source of information, was
17 permitted to submit facts and figures on Plymouth's off-site
18 planning over which it had no jurisdiction.

19 This appalling staff work was used by the NRC
20 commissioners as a basis for giving permission for Pilgrim
21 to restart in December 1988. What this really meant is that
22 Plymouth did not have sufficiently developed radiological
23 disaster protection during the tense restart and ascension
24 program of Pilgrim Nuclear Power Station from December 1988
25 onward.

1 In fact, the NRC graded drills of emergency
2 planning required every other year by NRC regulations had
3 been waived as a requirement since 1985. The required drill
4 was not held until October of 1989, nine months after
5 Pilgrim went on line, after it was given permission to
6 restart.

7 In summary, the NRC permitted restart when it was
8 operating on false information furnished by its own staff,
9 at a time when the approval of the old plans of Plymouth had
10 been withdrawn by the Federal Emergency Management Agency
11 and when the required testing of the radiological emergency
12 plan had not taken place since 1985.

13 This is protection of the public safety? This is
14 betrayal of the public safety.

15 And now we note that Chairman Carr has decided he
16 will not punish staff members who gave that false testimony.
17 This is indefensible. This is justice denied. This is a
18 system gone mad. This is outrageous. And this is
19 dangerous.

20 The names of those who testified are in the public
21 documents. The Town of Plymouth has a three-inch file of
22 letters it sent to Commissioner Carr and other NRC staff
23 correcting statements. It did this many times in many
24 forms. It kept the state, Senator Kennedy, Senator Kerry
25 and Representative Studts informed. They in turn also

1 contacted the NRC. My attachment 5 to this which I will
2 pass to your reporter has the three of them signing a
3 document and attesting to that fact.

4 There has been an arrogant NRC disregard for local
5 and state authority, for the truth and for public safety.

6 Nobody should excuse the inaccurate information
7 furnished by NRC staff members on the preparedness plans of
8 the Town of Plymouth. They had been told in writing several
9 times as well as orally, about the falseness of the
10 information they had presented. These are public documents.
11 These are public documents of the Town of Plymouth and of
12 the NRC.

13 Let me read into the record from our most recent
14 communication, so that the position of the Plymouth Board of
15 Selectmen is unmistakable:

16 "The Plymouth Board of Selectmen is shocked by the
17 decision of the Nuclear Regulatory Commission to take no
18 action against staff and others who furnished incorrect and
19 unvalidated testimony to the Commission in 1988 and in 1989
20 on the radiological emergency preparedness of this
21 community."

22 Skipping further on:

23 "The NRC staff repeatedly testified and advised
24 without sufficient investigation, without consultation with
25 local officials, without studying official emergency plans

1 of Plymouth, --" not a one opened one of our plans --
2 "without any public hearings on emergency planning. Our
3 charges to that effect and our sworn testimony are a matter
4 of record. Our written protests are a paper trail through
5 all of 1989.

6 "The recent Inspector General's report is replete
7 with findings and conclusions that show exceedingly poor
8 staff work and absolutely inaccurate, misleading testimony.
9 It is outrageous and dangerous to permit such behavior to go
10 unpunished."

11 This letter was written to our Congressman and to
12 our two Senators and we urged them on behalf of the citizens
13 of the town and all other communities subject to NRC
14 decision and oversight to insist on disciplinary action.

15 The names of the NRC staff that testified
16 inaccurately, incompletely and presented untrue facts in the
17 face of many written and oral corrections from the state of
18 Massachusetts and from the Town of Plymouth were Thomas A
19 Murley and Ronald R. Bellamy. In addition, William Russell,
20 the Region 1 NRC Administrator, regularly used a so-called
21 "Status of Pilgrim Emergency Planning," and off-site so-
22 called report from Boston Edison, when he and Boston Edison
23 both knew that the local towns and state had the legal
24 responsibility for off-site planning and BECO had none.

25 Only the towns could have had valid, up-to-date

1 information. It was not sought. It was not until Plymouth
2 and Duxbury officials met with Mr. Russell on February 17,
3 1989, and insisted that they be able to amend such reports
4 that went through this pernicious channel which was filled
5 with errors and which was changed to include review by the
6 towns finally.

7 The names of the emergency preparedness employees
8 of Boston Edison who furnished this misleading and sometimes
9 inaccurate information on the request of the NRC are no
10 secret. They surely are available from the personnel office
11 of BECO. Without doubt, these reports were used by the NRC
12 without sufficiently determining their validity.

13 Please note that as late as February 7, 1989, the
14 Town of Plymouth refuted this so-called report on the status
15 of Plymouth's emergency planning. And I will read from
16 attachment 2, which I will pass to your reporter.

17 "Please refer, Mr. Zech --" and he was then the
18 Chairman of the Nuclear Regulatory Commission -- "to the so-
19 called 'Status of Pilgrim Emergency Planning Issues'
20 (January 27, 1989) forwarded by Boston Edison to NRC staff.
21 Actually, the very title is incorrect, since in the case of
22 the Town of Plymouth, the report purports to be a status
23 report on off-site radiological planning issues, not a
24 matter of jurisdiction or responsibility of Boston Edison
25 but one of jurisdiction of the Town of Plymouth. By

1 previous letter, we reject the validity of Boston Edison's
2 reporting on our off-site preparedness. Only we know our
3 day to day status and, if you want the truth, you may have
4 it from us.

5 "However --" and I point out to them that even in
6 that particular report, January 27, 1989, in that particular
7 report, it speaks to "enhancements" being done at the
8 Bridgewater reception center.

9 As a matter of fact, at that point in time, talks
10 with the governing Bridgewater College Board of Trustees
11 were not even scheduled until the following month, so there
12 had been no agreement even that they were permitted to use
13 the site, "let alone enhance it." "Essentially there is
14 nothing in place except an old gymnasium." I know -- I
15 played basketball there.

16 "Even the portal monitors are stored elsewhere in
17 the town. How then did the emergency staff and Boston
18 Edison testify in October and December that this reception
19 center could perform the functions of monitoring and
20 decontaminating the numbers of persons expected to use
21 Bridgewater during an evacuation?"

22 Also on this so-called report, the Board of
23 Selectmen speaks to planning issues of Taunton, another
24 reception center, the main one for the Town of Plymouth.
25 That building was not even cleaned until January 28 and 29,

1 1989, having been used for those who were mentally
2 unbalanced in previous years but found to be too archaic for
3 the use of those who were insane. So it was to be used as a
4 reception center.

5 "Note that the portal monitors (not yet properly
6 positioned or tied into the electrical system) didn't arrive
7 until January 10, 1989." How then could anybody testify in
8 October and December that that center was ready to receive
9 and decontaminate? *

10 "Note that the portable decontamination unit (not
11 yet connected to plumbing) --" and the date of this is
12 February 7, 1989 --, "On what basis then, did you accept
13 Boston Edison's testimony in October of 1988 and your
14 staff's statements of December 9, 1988 that the Taunton
15 center could perform the functions of a reception center?"
16 There was nothing there. There were some desks with some
17 notebooks on it, as far as I can determine. I know, because
18 two selectmen -- and I was one of them -- went to visit on
19 February 2, 1989. And those are facts. That's not hearsay.
20 Those are facts.

21 "We do not feel that the commissioners know the
22 truth," the letter said. "It certainly affects your
23 credibility in the present circumstances."

24 "We're living through tenuous restart procedures"
25 -- and I go on in that particular letter space. But I think

1 you get the import of what was said.

2 That was absolutely untrue testimony on the
3 readiness of the Taunton and Bridgewater reception centers.
4 And it was received by the NRC and presented as the truth.
5 Who furnished those untruths? That should be easy. It's a
6 matter of your public testimony.

7 I regret the length of this statement tonight.
8 But since the NRC has not believed Plymouth's previous
9 reports and substituted therefor shoddy and inaccurate staff
10 work, as the Inspector General has so well documented, it is
11 essential to hang the truth out there, not so we can say "We
12 told you so" but so you can cleanse yourself by finding and
13 disciplining the guilty and by assuring us that our public
14 safety is paramount with you.

15 Your failure to do so, to cleanse yourself, will
16 be exactly what it appears to be: a cover-up, a cop out, a
17 whitewash, a lack of courage. There has been a disregard of
18 safety. Official communications have been ignored, and
19 possibly deliberate misrepresentation has taken place.

20 If these persons who put our town at risk had been
21 selectmen, they would have been recalled by the people. Had
22 they been Congressmen, they would have been impeached. What
23 does the NRC do? Never mention them by name? Never
24 discipline them? Promote them?

25 The heritage of America of runs deeply here in

1 Plymouth. We go on expecting justice; nay, we demand it.

2 There should be no misunderstanding about where
3 the Town of Plymouth means to go. The sorry past behavior
4 of NRC is not dead for us. It is the continuum of the
5 present. And it's a grim omen for the future.

6 Our pilgrim and our immigrant blood runs strongly
7 in our veins. Our standards of conduct for officials is
8 traditional, and that's high. The NRC has failed us. We
9 don't expect to find that again.

10 Our Civil Defense Director, Douglas Hadfield, will
11 tell you later where we are today. But a general statement:
12 We have made a massive commitment in man hours, in training
13 and equipment?—We currently still do not have an approved
14 implementing procedure for our eight schools. They are
15 widespread, 8000 students and over 1000 staff.

16 Other aspects of planning are under revision, as
17 they must be in emergency planning. Constant revision.
18 Retraining, however, is a real serious need and we must get
19 at that.

20 We have equipment needs and we have been told by
21 Boston Edison it does not mean to continue to assist us
22 under NUREG 0654 in two of those categories. That
23 particular letter has already been forwarded to FEMA and to
24 the state.

25 We've come a long way. We still have a long way

1 to go. We are a town of 103 square miles. We don't have an
2 average job. One of your people got up and testified our
3 problem is not unique. Oh, yes?

4 Well, then find another town 103 square miles.
5 Let him find one that gets a million visitors in the course
6 of its summer season. Let him find one who has a population
7 of roughly 45,000 but annualized with what comes in and out
8 becomes 51,000. Let him find a town that doubled its
9 population in ten years.

10 Yes, we are unique. We have a huge problem. And
11 that's why I'm running on tonight, because you said ten
12 minutes -- but I tell you, every single time I've spoken
13 before the NRC, one time it was two minutes; another time,
14 it was ten minutes, and tonight I'd like to see who it is
15 that would throw me out. Call one of the Plymouth policemen
16 and see if he'll do it.

17 (Applause)

18 Retraining as I have told you is a serious need.
19 We have equipment needs. But Mr. Hadfield will go into that
20 in greater detail. Mr. Hadfield, of course, is our Civil
21 Defense Director.

22 Please be advised that the Plymouth Board of
23 Selectmen has voted not take part in the NRC drill in 1991
24 unless we have some positive response to our needs and
25 unless we feel you are being honest with us.

1 The question of the Inspector General's report was
2 not "Where are we today?" The question was "Where were we
3 from October 1988 to October 1989?" The NRC seems to have
4 no stomach for taking forthright action against grossly
5 unreliable staff work. Credibility is at an all time low.

6 Please be advised -- and I am stating it again --
7 ~~the Town of Plymouth will not participate in the required~~
8 ~~drill of 1991 unless it has a positive response to its~~
9 ~~continuing needs that it discovered from the drill of~~
10 October 1989. To go into still another without those needs
11 and without those weaknesses that were revealed ameliorated
12 would make no sense whatsoever. We're not going to take
13 another test to validate somebody's bureaucratic work.

14 NRC inaction will be perceived for what it is:
15 official cowardice and whitewash, not admirable, not
16 acceptable to the Town of Plymouth. And let us hope not
17 acceptable to the oversight responsibilities of the Congress
18 of the United States.

19 (Applause)

20 MR. MARTIN: I understand there's another
21 representative from Plymouth who is speaking? Mr. Hadfield?

22 MR. HADFIELD: I am Douglas Hadfield, the Civil
23 Defense Director for the Town of Plymouth. My speech will
24 be brief. I am not an orator. I am a worker. I don't wear
25 business suits and ties; I wear regular clothes.

cto.



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird
Senior Vice President -- Nuclear

October 4, 1988
BECO Letter #88-141

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

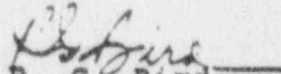
Docket No: 50-293
License No: DPR-35

Subject: Boston Edison Company Report on the Status of
Offsite Emergency Preparedness Around Pilgrim
Nuclear Power Station

Dear Sir:

Enclosed is Boston Edison's response to the NRC's letter of September 26, 1988 entitled "Offsite Emergency Preparedness - Pilgrim Nuclear Power Station (PNPS)". This written description reflects Boston Edison's understanding of Pilgrim offsite emergency plans, implementing procedures, training, and the status of the six issues identified by the Federal Emergency Management Agency in August 1987.

Please contact either Ron Varley, Manager of Emergency Preparedness or myself with any questions or comments.


R. G. Bird

/Attachment

BOSTON EDISON COMPANY REPORT
ON THE STATUS OF OFFSITE
EMERGENCY PREPAREDNESS AROUND
PILGRIM NUCLEAR POWER STATION

Nuclear Reactor Regulation
Staff Meeting

October 5, 1988

I. INTRODUCTION

By letter dated September 26, 1988, the Nuclear Regulatory Commission (NRC) Staff requested that Boston Edison Company provide a written report describing our current state of knowledge concerning the status of: (1) the offsite emergency preparedness program around Pilgrim Nuclear Power Station (Pilgrim); and (2) the issues identified by the Federal Emergency Management Agency (FEMA) in its August, 1987 "Self-Initiated Review" (SIR). A copy of the Staff's letter is included as Attachment A to this report.

The purpose of this document is to provide the written report requested by the Staff. Section II provides an overview of the efforts made to enhance the offsite emergency response program to date. Section III addresses the actions taken to address the specific "SIR" issues. Section IV provides a brief conclusion.

An extensive effort has been underway to upgrade the offsite emergency response program around Pilgrim Station. That effort has involved all of the parties responsible for the offsite program for Pilgrim. Those parties include the Commonwealth of Massachusetts, the five towns in the Pilgrim plume exposure pathway emergency planning zone (EPZ) (the Towns of Plymouth, Kingston, Carver, Marshfield and Duxbury), and the two reception center communities of Taunton and Bridgewater. Though offsite emergency response is primarily the responsibility

of the Commonwealth and the local governments, Boston Edison Company has provided extensive assistance in the emergency planning effort.

As discussed in more detail below, a great deal of progress has been made in upgrading the state of offsite emergency preparedness around Pilgrim Station. This progress has been explicitly recognized by FEMA. In letters dated March 30, 1988 to Governor Dukakis and Mr. Robert Boulay (Director of the Massachusetts Civil Defense Agency and Office of Emergency Preparedness) (MCDA), FEMA stated that "some outstanding improvements are now underway in the PNPS emergency plans" and that "[i]t is gratifying ... to observe the progress ... made in the past year toward achieving an off-site plan that will provide reasonable assurance that the public health and safety will be protected"

We believe that the significant progress achieved to date is due, in some measure, to our recognition that the offsite emergency response program "belongs" to the Commonwealth and the towns, and that our legitimate role is to provide assistance in improving and maintaining their offsite program. Accordingly, it is important to stress that the views presented in this report are those of Boston Edison, and that we are not speaking on behalf of either the Commonwealth or the towns.

drivers will have been transferred from the EPZ before the need to evacuate materializes. Nevertheless, school bus drivers participating in the Pilgrim one-lift plan are and will continue to receive training based upon the lesson plans described above (which include training for dosimetry and KI use).

B. SIR Issue B. Reception Center

Subissue B.1 (SIR, p. 19)

"[A] new reception center must be found to replace Hanover."

At the time that the SIR was issued, the existing offsite emergency program utilized the Taunton State Hospital and Bridgewater State College as reception centers for persons evacuating from the EPZ. The Hanover Mall had previously been designated as a third reception center, but was no longer available for that purpose.

Boston Edison's September 17, 1987 "Action Plan" stated that an evaluation of the feasibility of using the two existing reception centers would be undertaken. On December 23, 1987, Boston Edison transmitted to the Commonwealth, the NRC and local officials a report entitled "Reception Center Feasibility Analysis", which assessed the capability of the Taunton and Bridgewater facilities to monitor the population for contamination in the Pilgrim EPZ in accordance with applicable federal guidance. 12/ While the report addressed other aspects of

12/ Letter, Ronald A. Varley to Peter Agnes, Jr. (December 23, 1987).

reception center operations, the primary purpose of the analysis was to determine whether the objective of that guidance could be achieved using two, rather than three, reception centers.

The analysis summarized in the report was conducted by planners provided by Boston Edison, in coordination with Taunton and Bridgewater officials, and concluded that the Taunton and Bridgewater facilities (with appropriate improvements and equipment procurement) would have the capability of monitoring the requisite number of persons evacuating from the EPZ in the event of an emergency at Pilgrim. While there have since been some minor changes in some of the specific logistics, the conclusions of the analysis remain valid.

Apparently, on February 17, 1988, the Commonwealth submitted the Reception Center Feasibility Analysis to FEMA, which subsequently concluded in its informal technical review comments on the draft Taunton and Bridgewater plans that:

The Reception Center Feasibility Analysis . . . adequately addresses [the capability to monitor and register evacuees in a 12-hour period]. 13/

Boston Edison has committed to undertake facility improvements and equipment procurement as soon as the arrangements with the Commonwealth are concluded. 14/

13/ FEMA Technical Review - City of Taunton Radiological Emergency Response Plan for Pilgrim (Revision 3, 11-14-87), dated March 29, 1988 at 9; FEMA Technical Review-Town of Bridgewater Radiological Emergency Response Plan for Pilgrim (Revision 4, March 1988), dated July 27, 1988 at 10.

14/ The Commonwealth has proposed that the Massachusetts Department of Public Works facility in the Town of Wellesley
(footnote continued)

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of:

OPEN MEETING WITH BOSTON EDISON
COMPANY: PILGRIM NUCLEAR POWER
STATION

)
) Docket No. 50-293
)

Pages: 1 through 93

Place: Rockville, Maryland

Date: October 5, 1988

HERITAGE REPORTING CORPORATION

Official Reporter
1130 L Street, N.W., Suite 600
Washington, D.C. 20005
(202) 638-4000

U.S. NUCLEAR REGULATORY COMMISSION

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OPEN MEETING WITH BOSTON EDISON)	Docket No. 50-293
COMPANY: PILGRIM NUCLEAR POWER)	
STATION)	

Wednesday,
October 5, 1988

Nuclear Regulatory Commission
11555 Rockville Pike
Room 2FM2
Rockville, Maryland

The above-entitled matter came on for hearing,
pursuant to notice, at 1:00 p.m.

APPEARANCES:

Moderator:

DANIEL G. MCDONALD
Senior Project Manager
Project Directorates I-3
Division of Reactor Projects I/II

Participants:

TOM MURLEY
Office of Nuclear Reactor Regulation

R.G. BIRD
Boston Edison

WILLIAM T. RUSSELL
Nuclear Regulatory Commission
Region I

Heritage Reporting Corporation
(202) 628-4888

APPEARANCES (CONT.)

RONALD VARLEY
Boston Edison

SAMUEL J. COLLINS
NRC Region I

EDWARD HOWARD
Boston Edison

R.A. LEDGETT
Boston Edison

WILLIAM D. TRAVERS
Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation

RONALD R. BELLAMY
Nuclear Regulatory Commission

1 from the company, since you're the one that has to implement
2 the programs to make those thing be lasting corrections.

3 MR. BIRD: Anyone in the Boston Edison group that
4 would like to add anything?

5 If there are no other questions, I'll turn the
6 floor over to Ron Varley.

7 (A copy of Mr. Bird's
8 presentation slides was marked
9 for identification as
10 Attachment 2.)

11 MR. MURLEY: Okay. Is that next on our agenda?

12 MR. McDONALD: Yes.

13 MR. VARLEY: Good afternoon. My name is Ron
14 Varley, and I am the manager of Boston Edison's emergency
15 preparedness department.

16 As I understand it, we have been asked by the
17 staff to describe our current state of knowledge in two
18 areas. First, the overall status of the off-site emergency
19 preparedness program around Pilgrim station. And second,
20 the status of the issues identified by the federal emergency
21 management agency in its August 1987 self-initiated review.

22 Before proceeding in providing the information
23 requested by the staff, I'd like to make one important
24 point. We believe that the significant progress that has
25 been achieved to date in improving the off-site program is

1
2
3 due, in some measure, to our recognition that the program
4 belongs to the Commonwealth and the towns, and that our
5 legitimate role is to provide assistance to them.

6 Accordingly, I want to stress that the views presented today
7 are those of Boston Edison, and that I am not speaking on
8 behalf of either the Commonwealth or the towns.

9 As I will discuss in some detail, great deal of
10 progress has been made in upgrading the status of off-site
11 emergency preparedness around Pilgrim Station. The quality
12 of those improvements under way has been explicitly
13 recognized by FEMA.

14 I'd like to begin by citing the basic improvements
15 to the off-site emergency response program achieved to date.
16 These include, among other things, enhanced draft plans, new
17 implementing procedures, implementation of a new training
18 program, a revised and updated evacuation time estimate, and
19 numerous forms of technical and financial assistance that's
20 being provided by Boston Edison. A fuller account of these
21 improvements is contained in our written response to the
22 NRC's information request.

23 Boston Edison has been engaged in a comprehensive
24 program of assistance to the Commonwealth and local
25 governments. Since the summer of 1987, a team of between 20
and 30 Boston Edison employees and professional emergency
planning consultants has been working on a day-to-day basis

1 now contain lists which identify the public schools, private
2 schools, and licensed day-care centers in the EPZ. These
3 listing are also contained in the relevant draft
4 implementing procedures so that they're readily available to
5 emergency response officials.

6 Specific draft implementing procedures now provide
7 detailed direction and guidance to the responsible emergency
8 response personnel in carrying out their action. Draft
9 facility-specific procedures have been developed for each
10 school and licensed day-care center. Moreover, while we
11 have estimated that 313 buses and 26 vans may be needed to
12 transport the maximum school and day-care center population,
13 transportation providers representing over 1100 buses and
14 147 vans have documented their willingness to assist.

15 The second issue raised by FEMA in it self-
16 initiated review was the lack of a reception center for
17 people evacuating to the north. At the time that the SIR
18 was issued, the existing off-site program utilized the
19 Taunton State Hospital and Bridgewater State College as
20 reception centers for persons evacuating from the EPZ. The
21 Hanover Mall had been designated as a third reception center
22 but was no longer available for that purpose at the time of
23 the completion of FEMA's review.


24 In December of last year, we completed and
25 transmitted to the NRC a report which assessed the

1 capability of Taunton and Bridgewater facilities to monitor
2 the population for contamination in the Pilgrim EPZ in
3 accordance with all federal guidance. The primary purpose
4 of that analysis was to determine whether the objective of
5 the federal guidance could be achieved using two rather than
6 three reception centers. The analysis summarized in the
7 report concluded that Taunton and Bridgewater facilities,
8 with appropriate improvements and equipment procurement,
9 would have the capability for monitoring the requisite
10 number of people evacuating from the EPZ.

11 While there have since been minor changes in some
12 of the logistics, the conclusion of the analysis remains
13 valid. Facility improvements and equipment procurement will
14 be undertaken as soon as arrangements with the Commonwealth
15 are concluded.

16 The third issue raised by FEMA was the lack of
17 identifiable shelters for beach population. In response to
18 this issue, a comprehensive shelter implementation program
19 that far exceeds applicable regulatory requirements has been
20 developed at Pilgrim. The program will insure that persons
21 on the beaches and at other major outdoor recreational areas
22 as well have access to adequate shelter in the event of an
23 emergency.

24 In order to insure that adequate sheltering
25 capacity existed, local officials, assisted by Boston


BOSTON EDISON
Emergency Preparedness Department
59 Industrial Park Road
Plymouth, Massachusetts 02360

January 25, 1989
EP89-95

Mrs. Alba Thompson, Chairwoman
Board of Selectmen
Town Hall
11 Lincoln Street
Plymouth, MA 02360

Dear Mrs. Thompson:

As you may know, the NRC Staff has directed us to provide it with periodic status reports on the offsite emergency response program in connection with its oversight of the ongoing Pilgrim Power Ascension Program. Enclosed is a draft of the first such report which the NRC indicated to me today may have to be submitted as early as this Tuesday (January 31, 1989).

This past September we were also asked by the Staff to provide information with respect to the status of the offsite program. As I did then, I would like to reiterate Boston Edison's continued recognition that the offsite program "belongs" to the Commonwealth and the towns, and that our legitimate role is to provide assistance in improving your offsite program. While we are required to provide the enclosed information, we have made it clear to the Staff that we are not speaking on behalf of the Commonwealth or the towns. If you have any questions, please do not hesitate to call.

Sincerely,



Ronald A. Varley
Manager, Emergency Preparedness

cc: J. Douglas Hadfield, C.D. Director

/cs
ID 2155

Status of Pilgrim
Emergency Planning Issues
As Of January 27, 1989

Boston Edison Company

This report is being submitted on behalf of Boston Edison Company in response to a request from the NRC Staff. It does not necessarily represent the views or opinions of the Commonwealth of Massachusetts or any of the local governments around Pilgrim Station.

STATUS OF EMERGENCY

PLANNING ISSUES

Bridgewater

Issue: Reception Center Renovations/Equipment Placement

Progress:

Reception Center Renovations:

Currently the Bridgewater State College Gymnasium serves as the Reception Center location. Discussions with Bridgewater State College about Reception Center enhancements to the building have been ongoing, but proceeding with the enhancements is not scheduled to commence until the Board of Trustees meets on February 23, 1989 to discuss and concur on the enhancements. Implementation of improvements will be coordinated with Bridgewater State College, Massachusetts Civil Defense Agency, and the Division of Capital Planning Office.

Equipment:

- Monitoring & Decontamination - M/D Equipment delivered to town
- Registration - in town
- Dosimetry - in town

STATUS OF EMERGENCY

PLANNING ISSUES

Taunton

Issue: Reception Center Renovation/Equipment Placement

Progress:

Reception Center Renovations:

Taunton State Hospital is designated as the reception center. Currently, the Cain Building is serving as the interim facility to be used for registrations, monitoring, and decontamination. Layouts for the building have been provided to Hospital Administrators, MCDA, and Taunton Civil Defense. The building is scheduled to be cleaned and organized on January 28 and 29. Arrangements are being made to move portable shower facilities to the Cain site. They are expected to be in place by February 3. Proposed final measures to establish a long term facility involve construction of a new building on hospital grounds. Discussions are underway with Hospital administrators to define building parameters.

Equipment: Portal monitors delivered to Taunton EOC as of 1/10.

Monitoring & Decontamination - delivered to Cain Building January 26 and 27.

Registration - delivered to Cain Building January 26 and 27.

Dosimetry - in town, delivered during this period.

Item No. Tr-15: "As a matter of fact, at that point in time, talks with the governing Bridgewater College Board of Trustees were not even scheduled until the following month, so there had been no agreement even that they were permitted to use the site, let alone enhance it."

Source: September 6, 1990, Public Meeting Tr. p. 47

Boston Edison Response:

See Responses to Items Tr-14 and Tr-152. In addition, contrary to the statement that "there had been no agreement ... to use the site", the Bridgewater State College had been designated by the Commonwealth as one of the reception centers for the Pilgrim EPZ many years prior to the January 1989 report and was included in prior exercises.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-16: "Essentially there is nothing in place [in Bridgewater] except an old gymnasium.' I know — I played basketball there."

Source: September 6, 1990, Public Meeting Tr. p. 47

Boston Edison Response:

See Response to Item Tr-14. The Bridgewater reception center has been enhanced and equipped by Boston Edison. For example, Boston Edison has spent approximately \$182,000 on facility enhancements and has provided a communications system consisting of one base station radio, nine portable radios, and chargers for those radios. These enhancements include an emergency diesel generator for Bridgewater as well as modifying the shower drains and providing a bladder to collect contaminated shower water. The bladder is hooked up to the plumbing system when the facility is activated. Other equipment necessary for monitoring, decontamination and registration have also been provided. These are discussed in the Bridgewater Equipment Maintenance Compensation Program list which is on file in the Bridgewater EOC.

The Kelly Gymnasium at Bridgewater is an ideal facility for a reception center. It provides ample space for evacuees waiting to be monitored or who have completed registration and are waiting for other family members to be processed. The gym's locker rooms are also ideal for decontaminating contaminated individuals. Moreover, there is ample parking area at the College for vehicle monitoring and, if necessary, vehicle decontamination. Therefore, the Bridgewater State College is well suited to serve as a reception center. See, e.g. Town of Bridgewater IP-22 (Draft-5, July 13, 1990), entitled "Monitoring and Decontamination"; Town of Bridgewater IP-13 (Draft-4, July 27, 1990), entitled "Bridgewater State College".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-17: "Even the portal monitors [for Bridgewater] are stored elsewhere in the town."

Source: September 6, 1990, Public Meeting Tr. p. 47

Boston Edison Response:

See Responses to Items Tr-14 and Tr-16. The portal monitors are currently located in a specially built storage area in the Kelley Gymnasium at the Bridgewater State College.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-18: "How then did the emergency staff and Boston Edison testify in October and December that this [the Bridgewater] reception center could perform the functions of monitoring and decontaminating the numbers of persons expected to use Bridgewater during an evacuation?"

Source: September 6, 1990, Public Meeting Tr. p. 47

Boston Edison Response:

Boston Edison did not so testify. See Response to Item Tr-14.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-19: "Also on this so-called report, the Board of Selectmen speaks to planning items of Taunton, another reception center, the main one for the Town of Plymouth. That building was not even cleaned until January 28 and 29, 1989, having been used for those who were mentally unbalanced in previous years but found to be too archaic for the use of those who were insane. So it was to be used as a reception center."

Source: September 6, 1990, Public Meeting Tr. pp. 47-48

Boston Edison Response:

See Response to Item Tr-14. As of January 1989 (the date of the Boston Edison report referenced in this item), the Taunton State Hospital served as a reception center. Although this item suggests that the State Hospital was inadequate, the attached letter from Robert C. Spearin, Taunton Civil Defense Director (January 11, 1988), states: "I feel that at this time we are adequately prepared to handle as many evacuees as necessary in the event of an emergency that would involve a release of radiation." In any event, the Taunton High School was subsequently substituted as a reception center. It has been enhanced, equipped and is capable of performing its function as a reception center.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Tr-19

CITY OF TAUNTON
DEPARTMENT OF CIVIL DEFENSE

CITY HALL
18 SUMMER STREET
TAUNTON, MASSACHUSETTS 02780



ROBERT C. SPEARIN
DIRECTOR

January 11, 1988

Dear Fellow Committee Members,

During the Area 11 meeting on January 5, 1989 a MCDA representative made several comments suggesting that the Taunton Civil Defense is not prepared to handle the task of monitoring and decontamination of evacuees from an emergency involving radiological contamination. This is not the first time comments to this effect were made by this representative.

These comments were quite simply untrue. It is clear the person who made these comments does not realize the resources available to our Civil Defense Agency, and the resourcefulness of emergency response personnel in Taunton.

In order to clarify this misunderstanding I want to address the following points:

- 1) The radiological emergency response plan and implementing procedures have been developed and approved by each agency head in the City.
- 2) The Fire Department is responsible for monitoring and decontamination. Ninety eight percent of Fire Department personnel have received some RERP training. Approximately 15 personnel from the Fire Department attended the "Fundamentals Course for Radiological Monitoring" and the entire Fire Department (119 persons) is scheduled to be trained in the monitoring and decontamination process.
- 3) The Civil Defense Agency has all equipment necessary to monitor potentially contaminated persons, vehicles, and equipment. This includes 3 portal monitors, each capable of surveying 5 persons a minute or 300 persons an hour and 50 CDV 777 survey meters.
- 4) The reception center facility designated by the State Civil Defense Agency is not ideal, but is in good structural condition and is capable of providing shelter, heat, and lighting. In order to decontaminate large numbers of persons in this facility outside resources may be necessary. Portable decontamination facilities, are available on an on-call basis to the City. Even if facilities at TSH were not available, the City has within it's boundaries 11 schools with gymnasiums, any one could be converted into a reception center within a minimal amount of time, and with a minimal amount of effort.
- 5) The function of a Civil Defense Agency is to protect and preserve

the safety of the public. The issue is not whether we can or cannot do our job, the fact is we can and always could. The issue is how far will our resources be stretched in the event of an emergency. As I stated before, I feel that at this time we are adequately prepared to handle as many evacuees as necessary in the event of an emergency that would involve a release of radiation.

I am writing this rebuttal in support of the Civil Defense Agency and the City of Taunton. It is my feeling that the City of Taunton has an excellent Emergency Response program that will only improve as planning and training continues.

Respectfully submitted,

Robert C. Spearin
Robert C. Spearin
Director

cc: R. Boulay
R. Varley
R. Johnson
A. Slaney
T. Rodger

Item No. Tr-20: "Note that the portal monitors (not yet properly positioned or tied into the electrical system) didn't arrive until January 10, 1989.' How then could anybody testify in October and December that that center was ready to receive and decontaminate?"

Source: September 6, 1990, Public Meeting Tr. p. 48

Boston Edison Response:

See Responses to Items Tr-14 and Tr-19. Those responses demonstrate that Boston Edison did not so testify. The portal monitors are currently stored at the Taunton High School reception center.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-21: "Note that the portable decontamination unit (not yet connected to plumbing' -- [at Taunton] and the date of this is February 7, 1989."

Source: September 6, 1990, Public Meeting Tr. p. 48

Boston Edison Response:

See Response to Item Tr-14. This item apparently refers to temporary shower trailers that were placed outside the Cain building at the Taunton State Hospital. The shower trailers are no longer in use and have been removed because the Taunton High School is now the dest. and reception center in Taunton.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-22: "On what basis then, did you accept Boston Edison's testimony in October of 1988 and your staff's statements of December 9, 1988 that the Taunton center could perform the functions of a reception center? There was nothing there. There were some desks with some notebooks on it, as far as I can determine."

Source: September 6, 1990, Public Meeting Tr. p. 48

Boston Edison Response:

Boston Edison did not so testify. See Response to Item Tr-14.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-23: "That was absolutely untrue testimony on the readiness of the Taunton and Bridgewater reception centers."

Source: September 6, 1990, Public Meeting Tr. p. 49

Boston Edison Response:

See Response to Iter Tr-14.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-24: "We have made a massive commitment in man hours, in training and equipment [in Plymouth]."

Source: September 6, 1990, Public Meeting Tr. p. 50

Boston Edison Response:

No response required.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-25: "We currently still do not have an approved implementing procedure for our eight schools [in Plymouth]."

"Retraining [in Plymouth], however, is a real serious need and we must get at that."

Source: September 6, 1990, Public Meeting Tr. p. 50

Boston Edison Response:

First, it should be noted that there are fourteen separate school locations in Plymouth, not eight. If the term "approved" in the above statement means formal acceptance as a final town procedure by responsible town officials, then no such "approval" has been given by any EPZ or reception center community for any implementing procedure to date.

On May 5, 1989, Ms. Alba Thompson, then Chairman Board of Selectmen in Plymouth, sent the attached letter to the Plymouth School Committee urging that the Committee complete action on radiological emergency plans. Moreover, the Plymouth school procedure was reviewed by the Assistant Superintendent (March 1988) and was used during the October 1989 exercise. Since the October 1989 exercise, the Plymouth School IP has been reviewed and revised to incorporate the lessons learned from the exercise. The Plymouth School Superintendent will be reviewing this revised procedure with the Plymouth School Committee and will seek their acceptance at a meeting scheduled for October 1990.

Initial training was conducted last year and annual retraining in Plymouth is underway. Training sessions have been scheduled under the Commonwealth's Emergency Worker Training program for Plymouth police, fire, and other emergency workers. This program was developed by the MCDA with input from the EPZ and reception center communities and assistance from Boston Edison, and represents a comprehensive program for the training of Offsite Emergency Response Organization (ERO) personnel for the Pilgrim EPZ.

Item No. Tr-25: (cont.)

The training program consists of training modules which contain one or more lesson plans. Lesson plans are tailored to relate to a particular emergency response action by an emergency worker using an implementing procedure. This may include hands-on training for the use of a particular piece of equipment like a dosimeter survey meter, portal monitor, or a radio. It could also include how to fill out a form, read a map, or handle a contaminated injured individual. Training also includes classroom sessions which review implementing procedures and emergency response actions. Additionally, an emergency worker must receive training in "Introduction to Radiation" and "Introduction to Emergency Response".

Also included as a part of the comprehensive training program is a program called "Instructor Certification Program" which includes a Train-the-Trainer program for instructors consisting of classroom training, classroom presentation and an evaluated field presentation. Candidates include personnel from the Commonwealth of Massachusetts, local communities and the Boston Edison Emergency Preparedness Department Staff. All candidates must be approved by the MCDA Training Coordinator prior to instructing a training course.

The Boston Edison Emergency Preparedness Department assists the MCDA Training Coordinator by maintaining a training database which tracks all training for emergency response personnel. This provides a reporting mechanism for the MCDA, local communities and Boston Edison on the status of training. Boston Edison also compensates emergency workers from the five EPZ

Item No. Tr-25: (cont.)

towns, two reception center communities, as well as volunteers and teachers, who receive training. Finally, all elements of the comprehensive training program are reviewed and updated annually.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Tr - 25

TOWN OF PLYMOUTH

OFFICE OF

THE SELECTMEN

11 Lincoln Street

Plymouth, Massachusetts 02360

(508) 747-1620

SELECTMEN

BRUCE M. ARONS
 GEORGE W. BUTTERS
 GEORGE W. CAMERON
 DAVID F. MALAGUTI
 ALBA C. THOMPSON Chairman



WILLIAM R. GRIFFIN
 EXECUTIVE SECRETARY

May 5, 1989

*Also went
 to Jim Sorenson
 Regional Committee*

Stephen Triffletti, Chairman
 Plymouth School Committee
 Town Hall
 11 Lincoln Street
 Plymouth, MA 02360

Dear Mr. Triffletti:

The Plymouth Civil Defense Director in replying to questions on the radiological emergency plans of the town emphasized that school emergency plans do not yet have the approval of your committee. Since the "sign off" by responsible agencies and departments is required before the Selectmen can consider plans and implementing procedures, the school's part of civil defense is missing from our municipal efforts.

We recognize the inherent difficulties in this planning area, but we would point out that the Pilgrim Nuclear Power Station is already in an ascension program sanctioned by the Nuclear Regulatory Commission. The Pilgrim Nuclear Power Station has already achieved 25% power and will be moving toward 100% in the immediate future. We are all vulnerable to those implications, and there is an urgency to completing radiological emergency plans.

The public safety makes it imperative that we move to bring plans into being. The Selectmen are approving implementing procedures "in concept" only, and we shall be seeking technical review from the Federal Emergency Management Agency and look forward to an actual test of our draft plans. Both actions, FEMA review and testing as required by the Nuclear Regulatory Commission, should reveal areas for additional work.

The area of radiological emergency planning is colored by doubts and fears, both rational and irrational. However, we have a responsibility to bring plans into being, always with the hope they will never be needed. The safety of our children and of the general public requires them.

Stephen Triffletti, Chairman
Plymouth School Committee
May 5, 1989
Page 2

We urge you to complete your action on radiological emergency plans. Would you be good enough to let us know when we may expect to receive your drafts?

Our Civil Defense Director stands ready to assist you at all times.

Very truly yours,
BOARD OF SELECTMEN

Alba C. Thompson

Alba C. Thompson
Chairman

ACT/lc

Item No. Tr-26: "We [Plymouth] have equipment needs and we have been told by Boston Edison it does not mean to continue to assist us under NUREG 0654 in two of those categories."

Source: September 6, 1990, Public Meeting Tr. p. 50

Boston Edison Response:

Boston Edison is providing and will continue to provide extensive resources to the Commonwealth and the five EPZ and two reception center towns. Our criterion for providing resources is whether or not a legitimate operational need for the equipment in question has been demonstrated.

Boston Edison has discussed the two particular equipment requests with Plymouth officials and explained why we do not believe they are necessary to carry out the existing planning program. In particular there is no emergency planning basis for providing additional four-wheel drive vehicles for the Plymouth Police Department to evacuate the beaches, a function assigned by Plymouth procedures to the Department of Public Works, Town of Plymouth IP-05 (Draft-5, May 10, 1989), entitled "Department of Public Works", or to purchase radios for the lifeguards who have no assignment in Plymouth emergency procedures. Furthermore, the communications concerns expressed by Town officials can be addressed effectively through the use of existing equipment. We do not believe that there is a need to purchase a mobile communications van.

Given Boston Edison's considerable funding efforts to date and our long-term commitments, it is inappropriate to imply a lack of support from Boston Edison simply because we do not agree to fund every equipment request. Since the October 1989 exercise alone, Boston Edison has provided the Town of Plymouth with considerable equipment and emergency preparedness support. For example, the Plymouth Harbormaster received four portable police radios, two bull horns, and one lightbar for his boat. Boston Edison has also ordered a police mobile and a marine mobile radio, and approved the order of two radios

Item No. Tr-26: (cont.)

for use by the Plymouth Fire Department at the Emergency Worker Monitoring and Decontamination Station (EWMDS). Boston Edison has also approved the order of eleven portables and three base radios for the Plymouth School Department. Additionally, Boston Edison purchased twenty-eight Citizen's Band (CB) radio/beacon light kits for Plymouth public schools (these are for the lead and follow cars in the bus convoy). Boston Edison planners have also provided support with plan and procedure revisions and training. Finally, our long-term commitments to maintain equipment, fund local civil defense staff positions, and compensate individuals for time spent in training clearly demonstrates our intent to provide continued financial support to the local communities.

CORRECTIVE ACTIONS:

Boston Edison will supply the eleven portables and three base radios for the Plymouth School Department.

SCHEDULE FOR COMPLETION:

A purchase order will be issued in November 1990 and radios will be provided consistent with vendor availability.

Item No. Tr-27: "Retraining [in Plymouth] as I have told you is a serious need."

Source: September 6, 1990, Public Meeting Tr. p. 51

Boston Edison Response:

See Response to Item Tr-25.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-28: "We have equipment needs [in Plymouth]."

Source: September 6, 1990, Public Meeting Tr. p. 51

Boston Edison Response:

See Response to Item Tr-26.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-29: "As of today, we still do not have an approved plan for school children [in Plymouth]."

Source: September 6, 1990, Public Meeting Tr. p. 53

Boston Edison Response:

See Response to Item Tr-25. To the extent that this item identifies the fact that neither the Plymouth Board of Selectmen nor the School Committee has formally approved the Plymouth school procedures, the statement is accurate. Indeed, none of the hundreds of implementing procedures for schools, police, fire etc..., in any of the local communities has been formally approved by Town Selectmen.

The critical item is the regulatory significance of that set of circumstances. It is important to understand that the procedures were developed in close coordination with the Commonwealth and local agency heads responsible for their implementation (e.g. police, fire, schools, DPW, etc.) and were demonstrated in the recent exercises. That close coordination usually included provision of draft procedures to responsible agency heads for review, discussion of the procedure by the agency head and Boston Edison planners, incorporation of comments, and review and comment by the agency head. Typically, existing procedures were developed as the result of numerous meetings and planning sessions with responsible local officials in which their inputs were incorporated and reflected the planning program. In addition, all towns have received some type of equipment to be used in implementing school procedures. The fact that political officials have not been willing to formally endorse the procedures does not detract from their efficacy.

Furthermore, while a formal submittal of "final" plans is required for FEMA to provide a formal 44 CFR Part 350 review, no such formal submittal is required for FEMA to evaluate the adequacy of plans or procedures for purposes of rendering an interim finding in support of the NRC licensing process.

Item No. Tr-29: (cont.)

"Draft" plans may and have served in the past as the basis for reasonable assurance findings. See, e.g., Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-932, 31 NRC 371, 389 (1990); Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), ALAB-808, 21 NRC 1595, 1601 (1985). FEHA's comments have been incorporated and plans and procedures have been revised. In short, the criticism that a specific plan or procedure has not been "approved" by the Commonwealth, Town Selectmen, or local school committees is not an indictment of the technical adequacy or practical implementability of the procedures.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-30: "In fact, no town in the EPZ has an approved school plan."

Source: September 6, 1990, Public Meeting Tr. p. 53

Boston Edison Response:

See Response to Item Tr-29.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-31: "The school committees still have a few problems that need to be addressed before they will consider any kind of approval. Radio equipment and transportation providers' availability are the most prominent."

Source: September 6, 1990, Public Meeting Tr. p. 53

Boston Edison Response:

Boston Edison has agreed to provide the requested radio equipment for the Plymouth School Department consisting of eleven portables and three base radios. See also Response to Item Tr-26. See Response to Item Tr-117 regarding availability of transportation providers.

CORRECTIVE ACTIONS:

See Response to Item Tr-26.

SCHEDULE FOR COMPLETION:

See Response to Item Tr-26.

Item No. Tr-32: "The egress issue for Saquish-Gurnet area and Clark's Island are still issues that must be addressed."

Source: September 6, 1990, Public Meeting Tr. p. 53

Boston Edison Response:

In the past, Duxbury Beach, Saquish Neck and Gurnet Point have not always been clearly distinguished. A map of these areas is provided as Figure Tr-32-1. Gurnet Point is at the end of a five-mile peninsula. The five-mile stretch leading up to Gurnet Point is called Duxbury Beach. Saquish Neck is at the end of and perpendicular to this peninsula. According to the Plymouth assessor's office, there are 209 houses at Saquish and Gurnet.

Access to Duxbury Beach is across the Powder Point Bridge from Duxbury or from a street in Marshfield. Access to Saquish/Gurnet is limited (by a seasonal security checkpoint) to residents and guests, who need four-wheel drive vehicles to reach this part of the peninsula. The access roads between the Saquish area and Gurnet Point are flooded by high tide conditions which occur during a full moon. This flooding makes the roads impassible for approximately two hours during that high tide condition. Thus flooding does not affect persons egressing from Gurnet Point or Duxbury Beach.

Duxbury Beach is open to the public, but at any given time, only 500 vehicles with four-wheel drive beach permits are allowed to enter the beach area, and by about 1,800 vehicle parking spaces near the entrance to the beach on the west side of Powder Point Bridge. As discussed in Response to Item Tr-61, the evacuation time estimate for Pilgrim notes a population count of 654 persons on the beach at Saquish Neck. With an average vehicle occupancy rate of 2.54 persons per vehicle used in the ETE, this would yield 257 vehicles exiting from Saquish Neck. However, in order to be conservative and to account for the fact that some persons may have been in their homes on

Item No. Tr-32: (cont.)

Saquish Neck when the aerial photograph was taken, evacuation times were estimated using 257 vehicles plus an additional 358 vehicles representing the actual number counted in the actual aerial photographs. This results in considerable double counting and provides a very conservative estimate of actual evacuation times. See ETE Rev 1. July 15, 1989 pp. M2-M3, centroid numbers 2507, 2707.

Emergency plans for Pilgrim call for precautionary closure of the Duxbury and Saquish/Gurnet Beaches at the Alert stage, which is prior to the stage at which evacuation of the general public in the EPZ is considered.

The ETE applies to the entire Pilgrim EPZ, including the Duxbury and Saquish/Gurnet Beaches. The ETE concluded that the Pilgrim EPZ could be evacuated in about four to seven hours. Among other things, this estimate accounted for the carrying capacity of the Powder Point Bridge from Duxbury Beach to Duxbury.

As discussed above, the flooding of the access road to Saquish Neck would not impact the evacuation of individuals on Duxbury Beach and Gurnet Point. For the reasons discussed in Response to Item Tr-59, it is not expected that flooding of the access road for approximately two hours during peak periods of lunar high tides would have any significant adverse effect on evacuation of the people on Saquish Neck. However, even if it is assumed that the individuals on Saquish Neck could not be evacuated during an approximately two hour flooding period, adequate protective measures would still be available for those individuals because:

- In general, the individuals on Saquish Neck are residents or guests of residents. Thus, the individuals could take shelter in their residences during the two hour tidal flooding period.

Item No. Tr-32: (cont.)

- Even if it is assumed that flooding delayed movement of the Saquish Neck population for up to two hours, it does not necessarily follow that the maximum estimated evacuation time for the Saquish Neck population would increase.
 - First, the maximum estimated evacuation time of about seven hours in the ETE was for the EPZ population as a whole. The ETE does not specifically identify a maximum evacuation time for the Saquish Neck population; however, calculations derived from the ETE show that the maximum evacuation time for Saquish Neck would be five and a half hours. Thus, the addition of approximately two hours would only result in a maximum evacuation time of approximately seven and a half hours, which is not significantly different from the maximum evacuation time for other residents of the Pilgrim EPZ.
 - Second, the maximum evacuation time in the ETE was performed using adverse weather conditions involving snow. It is not reasonable to postulate the existence of two adverse independent conditions (e.g., snow and tidal flooding) because of the low probability of simultaneous occurrence of adverse weather, tidal flooding, and a serious accident at Pilgrim. Since adverse weather conditions involving snow (or rain) increase the evacuation time estimates in the ETE by approximately two hours, it is evident that a delay caused by tidal flooding would not be significantly different than a delay caused by adverse weather conditions. Thus, postulating flooding of the access road instead of adverse weather would not affect the evacuation time estimates for the Saquish Neck population.

Item No. Tr-32: (cont.)

- Finally, even if it were postulated that snow and flooding occurred concurrently, it does not necessarily follow that the flooding would extend the total evacuation time by approximately two hours. The critical path in evacuation of the Duxbury/Saquish/Gurnet Beaches is not the beach roads or the Powder Point Bridge, but instead other points inland along the evacuation route (which have lower capacity factors). This is demonstrated in the ETE, pp. 9-27 to 9-34, which shows that congestion builds early north and west of the Powder Point Bridge but dissipates toward the later stages of the evacuation. Therefore, to the extent that the Saquish Neck population is delayed in evacuating by approximately two hours due to tidal flooding, it would arrive at these critical points at a later time when the roads would not be as congested. Consequently, the Saquish Neck population would be able to traverse these points more quickly. Thus, at least all or part of the time lost by flooding would be regained at these critical points. Consequently, the total evacuation time for the Saquish Neck population would increase little if at all as a result of tidal flooding.

Clark's Island is a small island located northwest of Saquish Neck. According to the Plymouth assessor's office, the island has thirteen houses, which are not year-around residences. Access to the island is by boat.

Item No. Tr-32: (cont.)

During low tides, the water at some places around the island can become shallow; however, egress by boat is still possible according to the Duxbury Harbormaster.

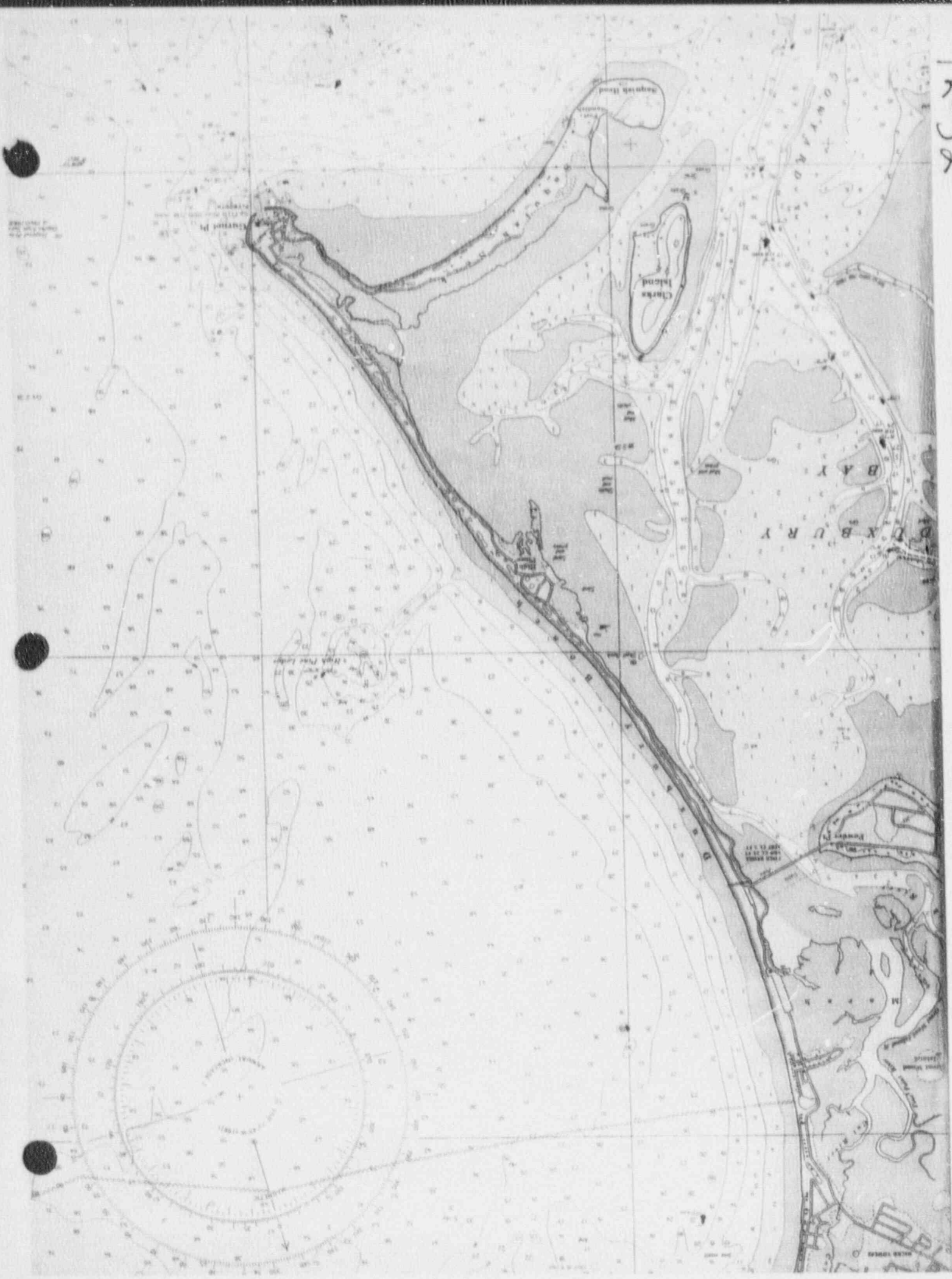
CORRECTIVE ACTIONS:

None Required

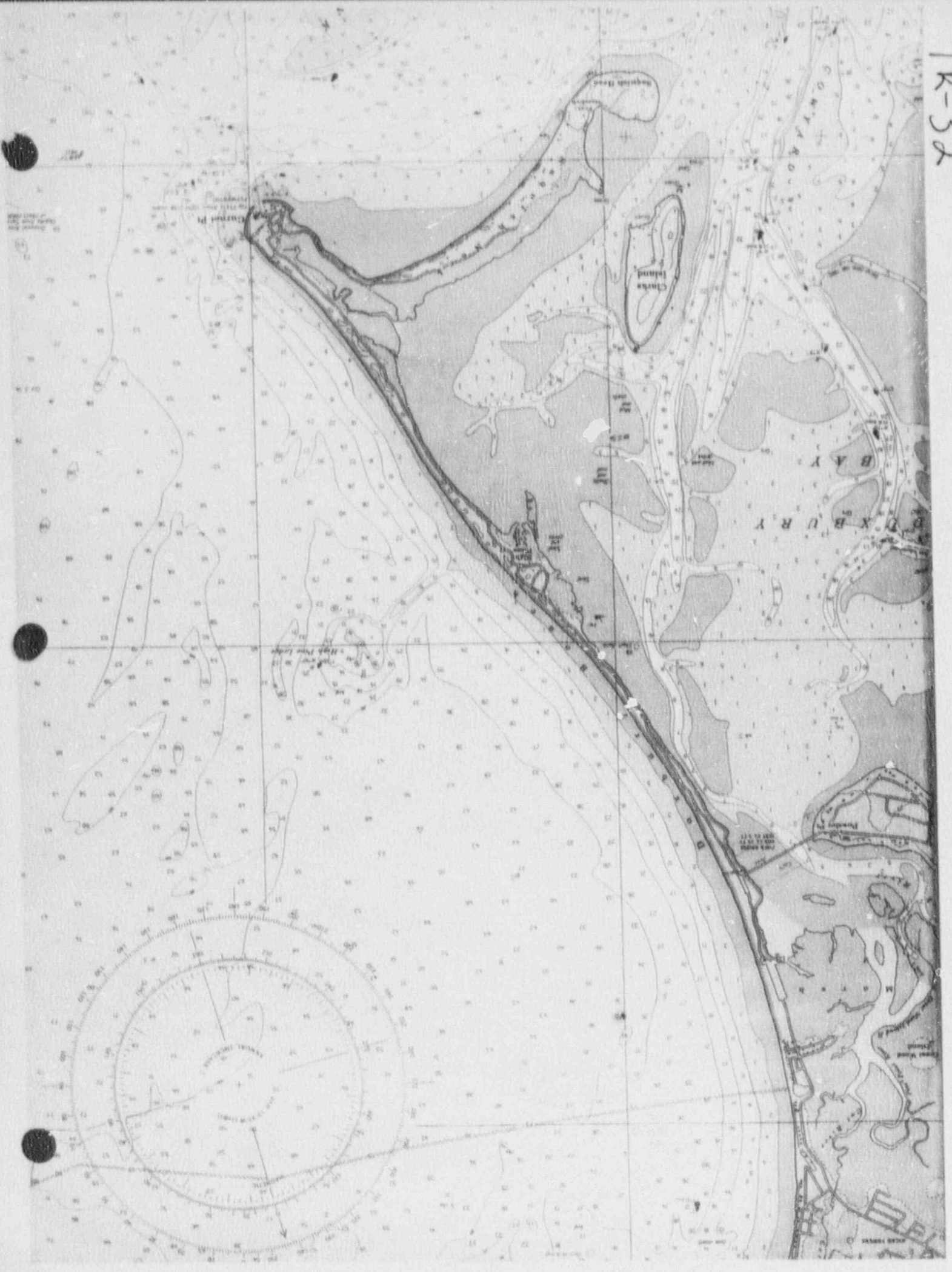
SCHEDULE FOR COMPLETION:

Not Applicable

TR-32



TR-32



Item No. Tr-33: "This is an issue [egress from Saquish/Gurnet area] that would trap possibly as many as 4000 people on a peninsula that they couldn't get off for a number of hours in an emergency situation."

Source: September 6, 1990, Public Meeting Tr. p. 54

Boston Edison Response:

As discussed in Response to Item Tr-61, 654 persons were counted from photographs taken from the beach on July 5, 1987. As discussed in Response to Item Tr-59, these people would not be "trapped" by flooding of the Saquish Neck access road during periods of lunar high tides. Furthermore, as discussed in Response to Item Tr-32, even if it is assumed that flooding delayed evacuation of Saquish Neck for up to approximately two hours, evacuation times for the Saquish population would not be significantly different than the evacuation times for other people in the Pilgrim EPZ.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-34: "The special needs information listing is still an inadequate list."

Source: September 6, 1990, Public Meeting Tr. p. 54

Boston Edison Response:

As discussed in Response to Items Tr-2 and Tr-7, several programs have been implemented to identify specific individuals with special needs in the Pilgrim EPZ, and to provide protection for them as well as those special needs individuals who have not so identified themselves in advance.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-35: "The planning issues [in Plymouth] are being addressed even as we speak. But the equipment issues are not."

Source: September 6, 1990, Public Meeting Tr. pp. 54-55

Boston Edison Response:

See Response to Item Tr-26. As evidenced in that response, there is no emergency planning need for the equipment requested and referenced in this item.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-36: "One of the main issues we found is the fact that not only was the emergency operations center of the Civil Defense in the subarea 3 which was according to the scenario had to be evacuated, not only was that in that area, but so is the central fire station which has all the alarm systems for the entire town in it, central police station, which there is only one police station, and the town hall. All in the same subarea."

Source: September 6, 1990, Public Meeting Tr. p. 55

Boston Edison Response:

The individuals who work in the central police and fire stations are emergency workers under the Plymouth plan, and they have specific duties to perform during an emergency. These individuals are trained in dosimetry and are aware of the effects of radiation. As emergency workers, it is expected that they will stay in the EPZ after the general public has evacuated. Moreover, they would be sheltered.

The Town of Plymouth is concerned about the following: 1) if Subarea 3 is directed to evacuate and the Central Fire and Police Stations are abandoned, there will be no one at these locations to answer the emergency lines (which go only into these two stations). Therefore, essential services (Police and Fire) for those subareas in Plymouth not under an evacuation directive will not be maintained; and 2) Also, town fire alarms ring only at the Central Fire Station, if the dispatcher is not there, fire services allegedly cannot be maintained.

The evacuation of Subarea 3 would not impact the functions of the Police and Fire Stations, as long as these Stations are not abandoned. Emergency lines could still be answered and alarms acknowledged. As discussed above, this requires the emergency workers in the Central Fire Station to man their posts after the public has left, something that emergency workers, by definition, do. In addition, as discussed above, these individuals are trained in dosimetry and the effects of radiation and would be sheltered.

Item No. Tr-36: (cont.)

Another option available to the Selectmen as decision makers in the EOC at the time of an emergency is to relocate Police and Fire dispatchers to another one of the six Fire Stations in Plymouth. Emergency lines could be call-forwarded to the new location and radio communications (at least for fire) would be readily available. Finally, alternate EOC capabilities have been provided for Plymouth at the MCDA Area II headquarters in Bridgewater. Town of Plymouth IP-02 (Draft-9, February 16, 1990), entitled "Civil Defense Agency". Boston Edison has provided the following equipment to the Area II Alternate EOC for the Town of Plymouth: Plymouth County F1/F2 radio for communications with police vehicles. The Police Department can then communicate with the Fire Department; C-Med radio; 440 MHz Ham radio for RACES communication and an external antenna and connection for an 800 MHz radio which would be brought from the Plymouth EOC.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-37: "But we have to address the issue of what happens when we have to evacuate the central police station and a central fire station. It's an issue that is not a dead issue, even though we've been told by Boston Edison that we can't get any permanent fixture and we cannot get a communications van that would be mobile that we could move to another situation. They don't feel -- maybe rightly so -- but still, they don't feel that that is a requirement of the NUREG 0654."

Source: September 6, 1990, Public Meeting Tr. p. 55

Boston Edison Response:

See Response to Item Tr-36.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-38: "We, along with the other groups that have spoken tonight and the other individuals that you'll hear yet later tonight, reviewed the emergency plans and are concerned with the school plan issues."

Source: September 5, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

See Response to Item Tr-29.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-39: "[There is a] lack of manpower in place to implement the plans [for the Town of Plymouth]."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

Rosters of emergency personnel change due to transfer of personnel and attrition from departments. It is recognized that at any point in time some positions may be vacant. Civil Defense and other town agencies continue to recruit, as necessary, to fill open positions.

During the October 1989 exercise, the Town of Plymouth demonstrated its ability to maintain adequate staffing on a 24-hour basis by an actual shift change. See Objective 34 in the August 27, 1990 Final Exercise Assessment, pp. 86-87. In particular, FEMA found that the "personnel at the Plymouth/Carver EWMDS adequately demonstrated a shift change of key personnel at 1200", and that "[b]oth shifts demonstrated their ability to process emergency workers, were well trained, knowledgeable and proficient in carrying out their emergency activities". Although FEMA determined that the Plymouth Transportation Officer did not demonstrate a shift change, it also found that "nine of ten [key] staff members did change over at [the EOCs for] Duxbury and Plymouth respectively".

The Town of Plymouth has a primary and alternate Transportation Officer. This will be scheduled as an objective for the next exercise. See Response to Item Ex-49. Additionally, Boston Edison will continue to support and encourage the Town of Plymouth in recruiting personnel for its emergency response organization.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-40: "[There are concerns about] transportation resource inadequacies,..."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

See Response to Item Tr-117.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-41: "[There is concern about] special needs planning."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

See Responses to Items Tr-2, Tr-7, Tr-8 and Tr-12.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-42: "[There is concern about] Saquish point planning."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

See Responses to Items Tr-4 and Tr-32.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-43: "[There are concerns about] potassium iodide distribution and lack of distributions to residents and schools."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

Radioprotective drugs are primarily intended for the use of emergency workers who would remain inside the EPZ during an emergency. See NUREG-0654, Rev. 1, p. 65. The "State Policy on the Use of Potassium Iodide (KI) as a 'Thyroid Blocking Agent' during Incidents at Nuclear Power Plants" (attached) recommends against use of KI for the general population. The emergency plans for Pilgrim are consistent with NUREG-0654 and the Commonwealth's policy and do not provide for the use of KI by members of the general public, other than institutionalized persons inside the EPZ who are unable to be moved. See September 1990 Draft Massachusetts RERP 9.0 Radiological Exposure Control and 9.5 Thyroid Protection pp. 9-8-9 (Attached).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable



Tr-43

The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Health

150 Tremont Street
Boston 02111

Michael S. Dukakis
Governor

Philip W. Johnston
Secretary

David H. Mulligan
Commissioner

Eleventh Floor

Tel: 727-6214

January 16, 1990

Robert Boulay, Director
M.C.D.A.
400 Worcester Road
P.O. Box 1496
Framingham, MA 01701-1496

Dear Mr. Boulay: 

This letter is in reference to a further clarification on the distribution of potassium iodide (K.I.) to emergency workers in the event of an accident or incident at a nuclear power plant.

While the previously established policy concerning the taking of K.I. during an emergency is still in effect (Attachment 1), we would like to make a change in how K.I. is distributed to emergency workers at the local level. We would like to see the instructions changed so that the supply of K.I. stockpiled under the control of the Civil Defense Director is distributed in portions equal to an individual's recommended dose and included with the dosimeters and film badges (TLDs) in the dosimetry packet that is issued to each emergency worker. The instructions in the plans should clearly state that the K.I. should not be taken until instructed to do so by MDPH. The reason why the instructions should specify "portions equal to an individual's recommended dose" is that these instructions will allow for changes in dose recommendations or type/amount of dose of K.I. that may occur over a period of time.

Please see that this change in distribution of K.I. is reflected in future issues of local, area and State plans. If you have any questions, please feel free to contact me.

Sincerely,

Robert M. Hallisey, Director
Radiation Control Program

RMH/pjd

Attachment (1)

cc: Buzz Hausner, MCDA
Thomas Matthews, MDPH
Ron Varley, PNPS

10105 104
10105 104



Bailus Walker, Jr., Ph.D., M.P.H.
COMMISSIONER

The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Health

150 Tremont Street

Boston 02111 Tel. 727-6214

State Policy on the Use of Potassium Iodide (KI) as a
"Thyroid Blocking Agent" During Incidents at Nuclear Power Reactors

It is the decision of the Radiation Control Program of the Massachusetts Department of Public Health that potassium iodide not be stockpiled for distribution during a nuclear power plant incident nor will administration of KI be recommended for the general population. At the discretion of the Commissioner of Public Health KI will be recommended for use by emergency personnel only in extraordinary circumstances. In this case the utilities will provide the KI to be used by emergency workers.

Rationale

1. Large quantities of KI are not commercially available at the present time.
2. The levels of radioiodines which would be released offsite during incidents at nuclear power reactors would not warrant administration of a thyroid-blocking agent as a protective action.
3. Side effects of administration of KI, including minor and serious allergic reactions, are unacceptable risks.
4. The shelf-life of KI is unpredictable.
5. Difficulties in communicating the time and quantity of KI to be taken if KI were stored at each residence makes it an impractical protective action.
6. Logistical difficulties and time problems are significantly large for even and thorough distribution of KI if it were centrally stockpiled.
7. Possibility of people taking the KI on their own the minute anything happens at the reactor.
8. Possibility of children taking KI without supervision.
9. Possibility of elderly people all alone and having an allergic reaction.

1/25/82

Item No. Tr-44: "[There is a need for] traffic studies -- anyone who has travelled on Route 44 knows that very well."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

See Response to Item Tr-160.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-45: "[I]nadequacies of the testings, the horn; the limits of the tests which have been done before and, as other speakers have mentioned, the request for a full test,..."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

The precise concern expressed in this item is not clear. To the extent that the speaker was discussing the October 1989 exercise or May 1990 remedial exercise, see Section IV of this report. To the extent that the speaker was discussing the effectiveness of the testing program for the siren system, see our response below.

The siren system for Pilgrim has been tested by FEMA and Boston Edison in accordance with applicable FEMA requirements and guidelines. To date, FEMA has not indicated any problems with those tests.

Boston Edison has developed, implemented, and maintained a comprehensive and aggressive siren system maintenance program. The Company maintains a full time staff of one supervisor, four engineers, and one test technician to test and maintain the siren system on a monthly basis. Over the past three years Boston Edison has maintained an exceptionally high degree of siren availability (routinely in excess of 97%).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-46: "[There is concern about] the lack of planning for in-home day care — a lot of us are parents, one-third of the children in the town are in in-home day care as opposed to centers."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

In accordance with the Commonwealth's Office For Children:

Licensed day cares are divided into two categories, Group day care centers and family day cares. Group day cares are day cares which are generally operated from a location dedicated to that business. Group day care centers and pre-schools in the plume EPZ have their own implementing procedures for emergencies. These procedures provide for early notification by a responsible official at the town Emergency Operations Center. Procedures also call for day care centers/pre-schools to notify responsible parents or guardians of the children in their facilities and to request that the parents/guardians pick-up their children. Any children remaining at the time a decision is made by the Commonwealth to transfer school children to a host school would also be transferred to the host school. See, e.g., Town of Carver IP-43 (Draft-2, April 4, 1990), entitled "Captain Pal Pre-School"; Town of Duxbury IP-36 (Draft-3, June 21, 1990), entitled "Bay Farm Montessori Academy and Munch-kin Montessori, Inc."; Town of Kingston IP-42 (Draft-3, June 11, 1990), entitled "Growth Unlimited Pre-School"; and Town of Plymouth IP-52 (Draft-1, July 6, 1990), entitled "Happy Day Nursery School".

Item No. Tr-46: (cont.)

Family day cares are day cares which are generally operated from a home or residence. These day cares are restricted to a six child limit. The six child limit includes the day care operators' children if they are less than ten years old and excludes the day care operators' children if they are more than ten years old. Family day cares from a standpoint of emergency planning do not pose any unusual emergency response problems. Consequently, family day cares are treated similarly to regular households in the population as a whole.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-47: "[There are] concerns about hospital planning."

Source: September 6, 1990, Public Meeting Tr. p. 57

Boston Edison Response:

It is difficult to be certain to which aspect of medical emergency preparedness this item refers. The only hospital within the plume Emergency Planning Zone is Jordan Hospital. Jordan has its own approved emergency plans for radiation casualty and mass disasters. The hospital's off-site radiological response program is fully integrated with the Town of Plymouth's and Commonwealth's emergency plans.

Notifications of emergency classifications are provided to the hospital by an official of the Town of Plymouth. See Town of Plymouth IP-07 (Draft 4, June 30, 1989), entitled "Health Officer" pp. 1, 2, 8, 10. In addition, Jordan Hospital has been provided with a tone alert radio. Transportation resources have been identified and are available through letters of agreement, and host hospital space has been pre-assigned at Morton Hospital in Taunton to accommodate evacuating patients and staff, if necessary. See Area II IP-08 (Draft-4, September 28, 1989), entitled "Special Facilities Coordinator", p. 9.

With regard to medical capabilities to treat contaminated injured members of the general public, the Pilgrim offsite plans far exceed the federal planning guidance of MS-1. MS-1 requires one qualified medical facility to be designated as the primary treatment facility for contaminated injured members of the general public, with a second facility identified as backup.

The Pilgrim offsite plans contain eleven hospitals capable of providing such treatment. These facilities have signed letters of agreement with the MDPH and are provided annual training and drills concerning the receipt and treatment of contaminated injured.

Item No. Tr-47: (cont.)

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. 1r-48: "[There are] concerns about the planning for MCI [sic] Plymouth, the county prison farm."

Source: September 6, 1990, Public Meeting Tr. pp. 57-58

Boston Edison Response:

It is unclear whether this concern refers to the Plymouth County House of Corrections (also known as the County Prison) or to the Massachusetts Correctional Institution (MCI) in Plymouth, which is a state correctional facility. In either case, emergency procedures have been developed.

MCI Plymouth receives emergency notifications from Area II, and the facility maintains its own transportation resources. If transportation shortfalls were to exist, MCI would contact the Commonwealth Department of Corrections to request additional vehicles. Monitoring and decontamination at MCI-Bridgewater is provided under the auspices of the Department of Corrections. See Town of Plymouth IP-14 (Draft-0), November 30, 1988), entitled "Massachusetts Correctional Institution".

The County House of Corrections (HOC) has a procedure which requests transportation resources from the Department of Corrections. Plymouth County procedures state that the Plymouth County Sheriff Chief of Operations is responsible for determining the availability of operational vehicles at the Plymouth House of Corrections at the Alert level. Plymouth County IP-01 (Draft-02, September 25, 1989), entitled "Sheriff's Department", p. 6. Additional transportation needs are transmitted to the Director of the Sheriff's EMA (see p. 4), who arranges for the necessary transportation through the Department of Corrections (see, p. 15). Monitoring and

Item No. Tr-48: (cont.)

decontamination at MCI-Bridgewater, actions as a host facility, would be provided by the MCI-Bridgewater staff. See Plymouth County IP-01 (Draft-02, September 25, 1989), entitled "Sheriff's Department". However, at this time we are unaware of supporting procedures being completed or training conducted for MCI-Bridgewater staff. To date the Commonwealth has not accepted Boston Edison's offers to provide procedural and lesson plan development support for this facility.

CORRECTIVE ACTIONS:

Boston Edison will continue to offer support to the Commonwealth to aid in the development of MCI-Bridgewater implementing procedures/lesson plans to support the MCI-Plymouth procedures.

SCHEDULE FOR COMPLETION:

Boston Edison does not have the authority to conclude this issue.

Item No. Tr-49: "One of the issues that we've looked at more closely is the newly installed direct torus vent system and the connections between that newly installed system and the emergency plans."

Source: September 6, 1990, Public Meeting Tr. p. 58

Boston Edison Response:

Prior to installation of the direct torus vent (DTV), Boston Edison's emergency operating procedures included provisions for the reactor operator to vent under certain conditions. The newly installed direct torus vent simply provides a more reliable system which is capable of venting the primary containment at full design pressure to an elevated release point. This system provides Pilgrim with a passive method of removing decay heat from the primary containment and virtually eliminating loss of containment heat removal as an accident that could cause reactor core damage.

The emergency action levels (EALs) have been revised to require that a general emergency be declared whenever the conditions requiring primary containment venting are approached. On September 14, 1990, the Boston Edison Emergency Preparedness Department met with Mr. Doug Hadfield, the Civil Defense Director of the Town of Plymouth and briefed him on the effect of the direct torus vent on Plymouth's Radiological Emergency Response Plan (RERP).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr--50: "But the significance of the change from a passive system which is steel and concrete which is an active system, an operator-initiated action, cannot be underestimated particularly with its connections to emergency planning. Because you now have a very difficult decision to make, to expose the public to any radiation that exists in the containment."

Source: September 6, 1990, Public Meeting Tr. p. 58

Boston Edison Response:

Prior to installation of the direct torus vent (DTV), Boston Edison's emergency operating procedures included provisions for the reactor operator to vent under certain conditions. The newly installed direct torus vent simply provides a more reliable system which is capable of venting the primary containment at full design pressure to an elevated release point. This system provides Pilgrim with a passive method of removing decay heat from the primary containment and virtually eliminating loss of containment heat removal as an accident which could cause reactor core damage.

For all design basis events the response of the operators, plant, and primary containment is unchanged due to the installation of the direct torus vent. The DTV is only used for beyond-Design Basis Accident events, and it allows for safe control of the plant under beyond-design basis conditions.

The emergency action levels (EALs) have been revised to require that a general emergency be declared whenever the conditions requiring primary containment venting are approached. On September 14, 1990, Boston Edison Emergency Preparedness Department met with Mr. Doug Hadfield, the Civil Defense Director of the Town of Plymouth and briefed him on the effect of the direct torus vent on Plymouth's Radiological Emergency Response Plan (RERP).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-51: "Our committee's review, including meetings with BECO, have not given us reassurances that the plans have been updated to include this new powerful and potentially dangerous system" [DTV].

Source: September 6, 1990, Public Meeting Tr. p. 59

Boston Edison Response:

See Response to Item Tr-49.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-52: "We [Saquish-Gurnet Association] have been told that the senior reactor operator in charge during an event is empowered by procedures to push the button and we feel the risk of dumping the containment if pressure looks like it's going to go over 27 psi is very real and would occur."

Source: September 6, 1990, Public Meeting Tr. p. 59

Boston Edison Response:

The Pilgrim venting criteria direct that venting be initiated with the direct torus vent after 30 psi ^{*}/ but prior to reaching the design strength of the containment. These criteria were established based on an evaluation of competing risks associated with venting as well as the multiple benefits of reliable, controlled venting as an accident management strategy. These benefits and risks were described in detail by Boston Edison personnel at a July 11, 1990 briefing of members of the Plymouth Nuclear Matters Committee on the subject of the direct torus vent.

^{*}/ The value 27 psi has no operational basis. See Response to Item Tr-53.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-53: "And that 27 psi, pounds per square inch, is an important number to remember. For it means that in effect we have the weakest commercial containment in the nation. Pilgrim is the first and right now it's the only installation with a direct torus vent."

Source: September 6, 1990, Public Meeting Tr. p. 59

Boston Edison Response:

Pilgrim's primary containment structure has had and continues to have a design pressure limit of 56 psi (which is comparable to the design pressure of other BWR Mark I containments), not 27 psi. The pressure of approximately 27 psi is the calculated value of the maximum pressure expected inside the torus following the most severe design basis accident.

The NRC has reviewed both the installation of the direct torus vent at Pilgrim and the associated analyses and found both acceptable. Because of the obvious benefits to a nuclear plant's capability to both prevent and mitigate the consequences of severe accidents, the Commission has directed its staff to approve installation of a hardened vent (such as Pilgrim's direct torus vent) under 10 CFR 50.59 for licensees who voluntarily elect to incorporate this improvement into their plants. Furthermore, the Commission has directed its staff to initiate plant-specific backfit analyses for each of the Mark I plants that does not voluntarily elect to install a hardened vent. Where the backfit analysis supports installation, the NRC staff will issue orders to licensees directing them to install the hardened vent in their plants. See NRC Generic Letter 89-16.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-54: "The reception centers, I believe, are sized only for 20 percent of the population."

Source: September 6, 1990, Public Meeting Tr. p. 60

Boston Edison Response:

See Response to Item Tr-69. This item represents a misconception regarding the regulatory guidelines and planning basis for reception center planning, and as well, misconceives the manner in which a reception center functions. Applicable FEMA guidelines provide that reception centers should be capable of monitoring and registering 20% of the evacuating EPZ population in about twelve hours, and the reception centers for the Primary EPZ satisfy this criterion. Beyond the twelve hour period, the reception centers would, of course, be capable of receiving, monitoring and processing additional EPZ population that might arrive. Persons are continuously processed through the facility and subsequently released or sent to Congregate Care Centers (CCCs).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-55: "And we hear tonight that we can process 39 [handicapped] people in 12 hours [at hospitals]."

Source: September 6, 1990, Public Meeting Tr. pp. 61-62

Boston Edison Response:

See Responses to Items Tr-10, Tr-11 and Tr-47.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-56: "A bare minimum of communications equipment has been provided by BECO [for Gurnet/Saquish residents]. The efficiency of this equipment will not be known until a full scale exercise has taken place."

Source: September 6, 1990, Public Meeting Tr. p. 64

Boston Edison Response:

Under the Town of Plymouth IP-15 (Draft-2, June 29, 1990), entitled "Gurnet/Saquish Association," the Saquish-Gurnet Association is required to perform the following communications: receive notification from the Plymouth Police dispatcher via the paging system, communicate with the Plymouth Harbormaster via a portable marine radio, receive notification over sirens, conduct route alerting using a bullhorn, and erect a warning sign at the entrance gate. As discussed in Response to Item Tr-4, Boston Edison has supplied the necessary communications equipment to accomplish these functions.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-57: "We requested that coordination of our plan be made with Duxbury emergency personnel rather than with Plymouth, as we are physically attached to Duxbury and evacuation would be through the Town of Duxbury. In response, preliminary draft plans call for interface with Duxbury emergency personnel. These plans were rejected and tentative agreement denied by Duxbury."

Source: September 6, 1990, Public Meeting Tr. p. 64

Boston Edison Response:

Although the peninsula containing the Gurnet/Saquish area is physically attached to the Town of Duxbury, the area is legally part of and subject to the jurisdiction of the Town of Plymouth. Therefore, emergency planning for the Gurnet/Saquish area is appropriately performed in conjunction with emergency planning for the Town of Plymouth. Although the residents of Saquish/Gurnet might prefer to coordinate with the Town of Duxbury, the plans and procedures established for their protection are adequate and comply with applicable regulatory criteria. Nevertheless, the Town of Duxbury has agreed, as a backup, to assist in any needed route alerting in the Saquish/Gurnet area after completion of route alerting in all Duxbury recreation areas. See Town of Duxbury IP-03 (Draft-9, April 10, 1990), entitled "Police Department", pp. 12, 13, 17 (step 16), 26, 27, 41, 42, and 67.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-58: "We [Gurnet/Saquish Association] requested that the emergency access road be upgraded. In response, BECO submitted one totally unacceptable plan which called for routing traffic over very sensitive dune areas. The question of access remains the single most important unresolved issue in the opinion of both the resident population and Plymouth Civil Defense Director Doug Hadfield."

Source: September 6, 1990, Public Meeting Tr. pp. 64-65

Boston Edison Response:

Upgrading of the access road to Saquish Neck would entail substantial engineering and construction effort, would most likely result in significant environmental damage, and might last for only a short duration before erosion would reclaim the area. In any event, upgrading of the access road is unnecessary. As discussed in Response to Item Tr-59, the access road is subject to the heaviest flooding for approximately two hours per tide for several days per month. As noted by the speaker, Boston Edison has offered to construct a road across the dunes to enable vehicles to utilize another Saquish/Gurnet road that is not subject to flooding. In any case, it would be possible to evacuate Saquish Neck on foot or by four-wheel drive vehicle over an environmentally controlled dune area during an emergency if the access road were flooded. Finally, as discussed in Response to Item Tr-32, even if evacuation were not possible during approximately two hours of flooding, it is still an option to shelter (see Response to Item Tr-129) until the peak flooding subsides and then to evacuate Saquish Neck.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-59: "[T]here is no vehicular access [from Saquish area to Gurnet Point] during lunar tides for a period of two and a half to three hours twice a day for five to seven days per month.

This covers the entire area southwest of Gurnet Point to the end of Western Point. This is the most heavily occupied area of the beach."

Source: September 6, 1990, Public Meeting Tr. p. 65

Boston Edison Response:

During periods of lunar high tides, the access roads between Saquish Neck and Gurnet Point are subject to flooding. Boston Edison's best estimates are that the road is flooded for several days per month, two high tides per day, and peak for approximately two hours per tide. During flooding, passage over an environmentally controlled dune area (which is above flood level) would be possible for emergency evacuation by either four-wheel drive vehicle or by foot.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-60: "The Gurnet-Saquish Association has given conditional approval to the draft plan for our area. We cannot stress strongly enough that we believe this plan to be seriously flawed and in fact is nearly unworkable until such time as the emergency egress road is seriously upgraded and arrangements are made with the Town of Duxbury to interface with Gurnet-Saquish Association emergency personnel."

Source: September 6, 1990, Public Meeting Tr. p. 65

Boston Edison Response:

See Responses to Items Tr-57 and Tr-58.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-61: "[T]he misinformation upon which many reports and recommendations were based was unbelievable, particularly the Lazarus-Hogan memo of November 1, 1988.

These include excessively low population figures [for the Saquish/Gurnet area]...."

Source: September 6, 1990, Public Meeting Tr. p. 66

Boston Edison Response:

The Saquish Beach/Gurnet Point area is at the end of a five-mile peninsula. The five-mile stretch leading up to Saquish and Gurnet beaches is called Duxbury Beach. See Figure Tr-32-1.

The emergency planning basis for the Saquish/Gurnet area is not based upon the Lazarus-Hogan Memorandum of November 4, 1988. Instead, it is based upon the October 26, 1987 "Pilgrim EPZ Public Beach Population Analysis". This Analysis is the most definitive evaluation of beach populations in the Pilgrim EPZ, and it includes population estimates for the Duxbury Beach and Saquish/Gurnet beach areas. These estimates were based upon a flyover and actual count of the number of persons on the Duxbury and Saquish/Gurnet Beaches on July 5, 1987 (which was part of a 3-day holiday weekend). The flyover showed 4,583 people on Duxbury Beach under "ideal beach weather conditions", which were conducive to maximum beach use. Most of these individuals were located near the entrance to the beach. The same flyover produced a beach count of 654 on Saquish/Gurnet Beach.

The evacuation time estimate for Pilgrim notes a population count of 654 persons on the beach at Saquish Neck. With an average vehicle occupancy rate of 2.54 persons per vehicle used in the ETE, this would yield 257 vehicles exiting from Saquish Neck. However, in order to be conservative and to account for the fact that some persons may have been in their homes on Saquish Neck when the aerial photograph was taken, evacuation times were estimated

Item No. Tr-61: (cont.)

using 257 vehicles plus an additional 358 vehicles representing the actual number counted in the actual aerial photographs. This results in considerable double counting and provides a very conservative estimate of actual evacuation times. See ETE Rev. 1 July 15, 1989 pp. M2-M3, centroid numbers 2507-2707.

The estimates used in the Analysis are consistent with other estimates. For example, Mr. Brad Martin (head of the Duxbury Department of Land and Natural Resources) told the NRC that the typical number of persons at Duxbury Beach would number about 3,000. Mr. Martin also told the staff that the number of people in the Saquish area was 400-500. See Memorandum from W. Lazarus and R. Hogan to W. Russell (November 4, 1988).

The estimates in the Analysis are also supported by other data. For example, according to the Plymouth Assessor's Office, there are 209 houses on Saquish/Gurnet. Access to Saquish/Gurnet is limited (by a seasonal security checkpoint) to residents and guests, who need four-wheel drive vehicles to reach this part of the peninsula. The Duxbury Beach is open to the public, but population is limited by the fact that only 500 permits are allowed for four-wheel drive vehicles to enter the Duxbury Beach area at any given time, and by about 1,800 vehicle parking spaces near the entrance to the beach. Given the limited number of houses on Saquish/Gurnet, the limited number of vehicles allowed access to Duxbury Beach, and the limited number of parking spaces, the population estimates in the Analysis are reasonable.

Some individuals have estimated that there may be as many as 4,000 to 5,000 people on Saquish/Gurnet. It is possible that these individuals were included in the Duxbury Beach population in their estimates, in which case their estimates are consistent with the estimates in the Analysis discussed above. However, if these individuals intended to imply that there may be

Item No. Tr-61: (cont.)

4,000 to 5,000 people on Saquish/Gurnet exclusive of Duxbury Beach, it is evident that these estimates are excessively high given the limited access to and the limited number of houses on Saquish/Gurnet. In particular, an estimate of 4,000 to 5,000 people on Saquish/Gurnet could be supported only if it is assumed that there are approximately 20 people per house on Saquish/Gurnet, which clearly is an unreasonable assumption.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-62: "[Reports of] the actual number of days and time per day that egress [from the Saquish area] is impossible [are unbelievable]."

Source: September 6, 1990, Public Meeting Tr. p. 66

Boston Edison Response:

See Response to Item Tr-59. As stated in that response, even during lunar high tides, egress from Saquish is not "impossible".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-63: "[Reports] of the dispersal of vehicles once they have reached the Duxbury Bridge area [are unbelievable]."

Source: September 6, 1990, Public Meeting Tr. p. 66

Boston Edison Response:

The Evacuation Time Estimate (ETE) for Pilgrim discusses the control of traffic in the Duxbury Bridge (i.e., Powder Point Bridge) area during an emergency. The east (or peninsula) side of the Bridge (where a parking lot is located) is assigned as a Priority 2 area during summer (high volume area) and Priority 4 during winter (low volume area). This location is also designated as a traffic and access control point, with appropriate traffic barriers and personnel to guide traffic. See ETE, p. I-D-16. The west side of the bridge is also a traffic control point, with appropriate traffic barriers to guide traffic. See ETE, p. I-D-17. The ETE also estimates that the capacity of the Powder Point Bridge is 1161 vehicles per hour. See EYE, p. N-11. This volume is consistent with one lane of closely-spaced cars (i.e., one car every forty feet) travelling about ten miles per hour. The Powder Point Bridge, which is a recently-built two-lane bridge, is clearly capable of handling this volume of traffic.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-64: "Our [Carver's] biggest problem at this time is voluntary personnel, especially for the emergency workers monitoring the decontamination station, which is a joint venture with the Town of Plymouth at the Plymouth Airport. We at this time have not been able to secure enough personnel from our town to cover this portion of the plan but are continuously trying."

Source: September 6, 1990, Public Meeting Tr. pp. 67-68

Boston Edison Response:

The Emergency Worker Monitoring and Decontamination Station (EWMS) for Carver and Plymouth is a joint operation between Carver and Plymouth, located at the Plymouth Airport. Boston Edison has provided resources to enhance the facility by adding additional showers and dressing rooms. The facility is operational and the Plymouth Fire Department is in place to serve as an EWMS team pursuant to Town of Plymouth IP-22 (Draft-4, March 2, 1990), entitled "Emergency Worker Monitoring and Decontamination Station". Emergency worker monitoring and decontamination training has been conducted for the Plymouth Fire Department, which has identified enough personnel to fully staff and operate the facility. Carver has identified four individuals to work at the EWMS and Carver Civil Defense Agency continues to seek additional volunteers to support the joint effort.

It should also be noted that emergency worker monitoring and decontamination is available at reception centers as stated in the procedure for school bus drivers, transportation staging area bus/van drivers, and ambulance personnel. For example, see Transportation Provider IP-3T (Rev. 0, March 28, 1990) entitled "Transportation Provider Emergency Medical Services for Staging Areas".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-65: "[W]e [Town of Duxbury] have identified the areas of weaknesses and communicated that information to FEMA and to our state civil defense agency in a very comprehensive report in June of 1990. This is the proper procedure for developing off-site emergency plans. We are attaching a copy of the status report that was sent to FEMA on June 22, 1990 [enclosed as part of Attachment 14 to the Transcript] plus an update of Duxbury's emergency preparedness status as of September 5, 1990."

Source: September 6, 1990, Public Meeting Tr. p. 77

Boston Edison Response:

Duxbury's June 22, 1990 comments identify the same or similar matters identified by FEMA's August 27, 1990 "Final Exercise Assessment". Those matters are either addressed by Boston Edison in Section IV of this report or were corrected in the May 1990 remedial exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-66: "I [James Lampart] have a somewhat more detailed statement I would like to submit to this group and ask that it be made part of the record of this meeting."

Source: September 6, 1990, Public Meeting Tr. p. 78

Boston Edison Response:

All of the items identified in Mr. Lampart's written statement were either discussed by Mr. Lampart or by others (such as Ms. Jane Fleming) in the September 6th Public Meeting. Therefore, the items in his written statement are encompassed within the other items to which Boston Edison has responded.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-67: "The five deficiencies I'm going to point to were identified by FEMA in its 1987 self-initiated review. They existed then, they caused the NRC to decide then that Pilgrim was in no condition to restart and they all exist today."

Source: September 6, 1990, Public Meeting Tr. p. 80

Boston Edison Response:

This item does not identify a substantive concern to which a response can be provided. Extensive progress has been achieved in upgrading the offsite program and addressing FEMA's 1987 concerns, and this has been recognized by the NRC and FEMA.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-68: "In 1987, FEMA found there was no adequate reception center. Mr. Boulay and Mrs. Thompson have made it abundantly clear that nothing has changed."

Source: September 6, 1990, Public Meeting Tr. p. 80

Boston Edison Response:

In 1987, the Hanover Mall was withdrawn as a third reception center and no replacement facility had been identified. Today, the Wellesley DPW facility has been formally secured as the third reception center through a binding LOA which is attached to the Responses to Item Tr-139. Plans and procedures have been developed, the facility has been enhanced and equipped, and personnel have been trained. See Wellesley DPW IP-05 (Draft-3, June 26, 1990), entitled "Wellesley Reception Center" and IP-17 (Draft-2, June 26, 1990), entitled "Reception Center Setup". See also Response to Item Tr-144.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-69: "If you accept the NRC/Dr. Bellamy's estimates, it will take 80 hours for the two portal monitors at Wellesley to monitor the 20 percent of the Duxbury population that's supposed to arrive. Your own regulations say this is supposed to be completed in only 12 hours."

Source: September 6, 1990, Public Meeting Tr. p. 80

Boston Edison Response:

We are not aware of the specific estimates by the NRC/Dr. Bellamy which are referenced in this item. However, Boston Edison's analyses demonstrate that the portal monitors at Wellesley can more than meet the criteria of monitoring the number of individuals expected at the reception center within twelve hours time. Indeed, the number of portal monitors provided at the Wellesley DPW facility (as well as at the other two reception centers) was determined based upon an evaluation of how many such monitors would be needed to meet the federal guideline.

The length of time needed to monitor each evacuee was based upon actual tests of the monitors and conservative estimates of entry and exit times. The Eberline PPM-1 Personnel Monitors used by the reception centers are capable of detecting contamination at the level specified in FEMA REP-2, Rev. 2, "Guidance on Offsite Emergency Radiation Measurement Systems", within two to three seconds per person. Allowing for portal entrance and exit, total time to monitor an individual is six to seven seconds. This has been demonstrated during monitor test and calibration. A count time of twelve seconds per person per monitor is used as a conservative basis for planning purposes. There are eight monitors located at the three reception centers, with an additional two monitors available from Pilgrim.

Finally, Item Tr-69 erroneously refers to the "20 percent in about 12 hours" criterion as an NRC "regulation". On the contrary, that criterion is

Item No. Tr-69: (cont.)

not an NRC or FEMA requirement, but is instead given as interim guidance in FEMA REP-2, Rev. 2, section 6.4.1 (originating from the Los Alamos Scientific Laboratory document LA-4558-MS, "Surface Contamination: Decision Levels").

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-70: "The monitoring will be ... done by the National Guard. The National Guard says it won't even arrive for between 6 and 12 hours."

Source: September 6, 1990, Public Meeting Tr. p. 80

Boston Edison Response:

The Massachusetts National Guard is activated for an emergency, when the Governor declares a State of Emergency. For a nuclear accident, this could occur as early as the Alert stage. While the entire National Guard unit of over eighty persons has received emergency response training, only about half are needed to provide full monitoring capability for the Wellesley DPW facility. The National Guard unit estimates that an advance party could be at the facility in one to four hours, with the remaining personnel arriving at intervals up to six to twelve hours. Monitoring of the first evacuees arriving at Wellesley could be accomplished with as few as six persons due to the use of portal monitoring equipment. The first evacuees arriving at Wellesley would occur at approximately five to six hours after the evacuation had been announced to the public. This estimate is based on two elements: Travel time to the EPZ Boundary (3:45 hrs/min) and travel time from the EPZ Boundary to the reception center (2:06 hrs/min).

Travel time for personnel in Duxbury or Marshfield to the EPZ Boundary is based on the Pilgrim Station Evacuation Time Estimate and Traffic Management Plan update Rev 1, July 15, 1989, Table 9-6 p. 9-9. That estimate is 3:45 hrs/min.

Travel time from the EPZ Boundary to the reception center is based on the Traffic Management Plans in support of reception centers for the Pilgrim Nuclear Power Station Rev. 1, September 22, 1989, Table 6, p. 21. That estimate is 2:06 hrs/min.

Furthermore, as contained in Wellesley DPW IP-05 (Draft-3, June 26, 1990), entitled "Wellesley Reception Center" and IP-17 (Draft- 2, June 26, 1990),

Item No. Tr-70: (cont.)

entitled "Reception Center Setup", the Wellesley reception center would be activated and prepared to receive evacuees by Department of Public Works employees stationed at that facility before the National Guard arrives.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-71: "In 1987, FEMA noted that there was no adequate planning for the evacuation of what it calls the transportation-dependent personnel, obviously largely school children. In 1990, there isn't either. Any of the plans show that in Duxbury there are least 510 busses needed."

Source: September 6, 1990, Public Meeting Tr. pp. 80-81

Boston Edison Response:

Emergency procedures show that approximately 500 buses are needed for evacuation of students and staff in schools and day care centers, special needs individuals, and other transportation-dependent persons in the entire EPZ for Pilgrim. This estimate was derived using the conservative assumptions described in the Response to Item Tr-9.

Population estimates for the Town of Duxbury indicate that about 85 buses will be needed for Duxbury. This estimate is based upon a capacity of 65 children or 45 adults per bus and upon a school population of about 3150, a day care and nursing home population of about 650, plus an allowance of 15 buses for other transportation-dependent individuals (i.e., homebound special needs, one pick-up point, and three evacuation routes). See, e.g., Town of Duxbury IP-06 (Draft-7, Oct. 5, 1989), entitled "School Department".

As discussed in Response to Item Tr-117, there are a sufficient number of buses and other transportation resources available to evacuate the transportation-dependent individuals and other individuals needing transportation within the EPZ for Pilgrim.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-72: "An analysis of the existing agreements in effect and what could best hope to be done under them show that less than 300 busses will arrive two hours after evacuation is supposed to begin."

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

See Response to Item Tr-117.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-73: "Mr. Cavanaugh has spoken to you about the total lack of any adequate evacuation planning for the [Saquish/Gurnet] beach area, another inadequacy noted by FEMA in 1987 and plainly in effect today."

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

See Responses to Items Tr-56 through Tr-63, which address the items raised by Mr. Cavanaugh at the September 6, 1990 Public Meeting.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-74: "And where are these [Saquish/Gurnet area] beach evacuees supposed to go once they have been evacuated?"

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

Individuals evacuated from the Saquish/Gurnet area would be directed to the Wellesley Reception Center. Among other measures, these directions would be provided by means of flyers distributed at the Powder Point Bridge area. See Town of Duxbury IP-15 (Draft-5, April 2, 1990), entitled "Conservation Department," pp. 6, 12.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-75: "Well, on a square foot basis, some people have apparently figured out that one place they can go is to Duxbury's Percy Walker Pool. Unfortunately, when they figured out how many people would fit in that building, they forgot that a lot of the swimming pool is under water."

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

In identifying shelters, a visual inspection was performed of each potential shelter with the building owner/manager. A shelter survey form was prepared for each building with information on handicapped accessibility, restroom facilities, and areas not suitable for sheltering (i.e., rooms with permanently opened sources of outside air, rooms containing sensitive materials, etc.) Stairwells and toilet facilities were not considered as usable shelter space. Blueprints were obtained for publicly owned buildings; privately owned buildings were physically measured. The square footage was determined of all rooms suitable for sheltering.

The actual space available for sheltering in each usable room was determined by multiplying the room square footage by a room usability factor. The room usability factor is a number unique to each specific type of room (classroom, office, cafeteria, etc.) which factors out space already utilized (by furniture, storage items, etc.). The usability factor was developed by physical measurement of selected representative rooms. Typical usability factors include 0.95 for a gymnasium or auditorium, 0.80 for a lobby, 0.73 for a cafeteria, and 0.59 for a classroom or office. Adjustments were made for rooms determined during the visual inspection to have more or less vacant space than typical for that specific type of room. In smaller privately owned shelter buildings, usable square footage was measured directly in lieu of applying usability factors to total square footage measurements.

Item No. Tr-75: (cont.)

The usable square footage for each room was divided by the FEMA standard of ten square feet (per person) to obtain room sheltering capacities. Individual room capacities were totalled to arrive at an overall sheltering capacity for each potential shelter structure. A final adjustment was made to these numbers to allow for persons already in the building during normal operating hours (i.e. staff, visitors, students, etc.), yielding a net shelter capacity for each building.

The Percy Walker Swimming Pool is identified as a shelter in the Duxbury Shelter Implementation Program. The acceptable shelter area in this building equals 4,350 ft² consisting of the pool perimeter, men's locker room, women's locker room and the lobby/lounge. The area of the swimming pool filled with water has not been factored in as acceptable shelter space in this building. See Town of Duxbury IP-70 (Draft-3, June 26, 1990), entitled "Shelter Manager Percy Walker Swimming Pool". Therefore, as provided for in the Duxbury Shelter Implementation Program, the number of people who could be sheltered in this building is 380 during normal operating hours and 430 during off hours.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-76: "[T]here aren't any host schools [for Duxbury]."

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

See Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-77: "There is nobody to communicate with. There is at best a gentleman's agreement in place between Duxbury and Needham [regarding host schools]."

Source: September 6, 1990, Public Meeting Tr. p. 81

Boston Edison Response:

On May 22, 1990, the Needham School Committee formally voted to act as the host community for the Duxbury school population. The School Committee's vote is reflected in the minutes of the May 22, 1990 school committee meeting and in a June 8, 1990 letter from Mr. Thomas J. Groux (Duxbury Town Manager) to Mr. Robert J. Boulay (Civil Defense Director MCDA). In addition, on September 11, 1990, there was a meeting between the Duxbury and Needham School Superintendents, where the Needham High School was designated as the host school for Duxbury children. For a description of the status of host schools for Duxbury see Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-78: "Ms. Arnold spoke about the handicapped population. The estimate she gave was that about 18 to 20 percent of the population is estimated to have needs."

Source: September 6, 1990, Public Meeting Tr. p. 82

Boston Edison Response:

See Response to Item Tr-8.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-79: "Thirteen hospitals at best can handle 39 [handicapped individuals] in a 12-hour period."

Source: September 6, 1990, Public Meeting Tr. p. 82

Boston Edison Response:

See Responses to Items Tr-10, Tr-11 and Tr-47.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-80: "Pilgrim has a new torus vent. The only torus vent. Any opening of that vent will require some emergency planning response. The existing IPs for emergency planning don't even deal with that contingency."

Source: September 6, 1990, Public Meeting Tr. p. 82

Boston Edison Response:

As the NRC has stated in Generic Letter 89-16, "Installation of a Hardened Wetwell Vent", all Boiling Water Reactors with Mark I containments have provisions in their emergency procedures for venting from the torus, or wetwell airspace, under certain circumstances. This has been and continues to be the case at Pilgrim. In addition, the Emergency Action Levels (EALs) for Pilgrim have been revised so that a General Emergency must be declared whenever the conditions that require venting are established. The potential results of the use of the direct torus vent systems do not pose any new or unique response requirements in the Emergency Plan Implementing Procedures. Furthermore, the Boston Edison Emergency Preparedness Department conducted a briefing session on September 14, 1990 with Mr. Doug Hadfield, Civil Defense Director for the Town of Plymouth, on the effect of the direct torus vent on Plymouth's Radiological Emergency Response Plan (RERP).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-81: "Similarly, Plymouth doesn't have what's needed for anything approaching real time on-site monitoring."

Source: September 6, 1990, Public Meeting Tr. p. 82

Boston Edison Response:

It is not clear whether the intent of this statement is to question the Town of Plymouth's ability to monitor radiation and airborne levels or Pilgrim's ability to monitor these levels.

If the statement pertains to Plymouth, there is no requirement for the Town of Plymouth to have real-time monitoring capability of field conditions. This is the responsibility of the Commonwealth and is implemented by MDPH. MDPH would dispatch two Nuclear Incident Assessment Teams (NIAT) to the Emergency Operations Facility (EOF) at the Alert level emergency classification. These teams would be dispatched and controlled by MDPH to determine radiation and airborne levels in the field around the plant and throughout the ten-mile EPZ. (See NIAT Handbook.)

If the statement pertains to Pilgrim, the ability for real-time monitoring of both onsite (inside the Protected Area) and offsite (outside the Protected Area) does exist in several forms. This responsibility is assigned to the licensee (plant operator) by NUREG-0654. At the Alert level classification, three Radiation Monitoring Teams (RMTs) would be dispatched to the EOF. These three teams would then be assigned locations by Boston Edison downwind from the anticipated effluent release point. Each team has the ability to monitor beta/gamma radiation levels and airborne iodine and particulate concentrations in the environment. The detection sensitivity of the instruments used in the field by these RMTs exceeds the requirements of NUREG-0654. Pilgrim also has eleven fixed location air monitoring stations from which samples could be retrieved by RMTs if directed to do so.

Item No. Tr-81: (cont.)

Item Tr-81, in context, also seems to refer to monitoring with respect to the use of the direct torus vent. The EALs developed for Pilgrim are written such that, when the conditions are met for use of the direct torus vent, a General Emergency declaration is required. As stated previously, at this classification level, there would be five field monitoring teams taking beta/gamma and airborne measurements. These teams would be the two NIAT teams controlled by MDPH and the three RMT teams controlled by Boston Edison. The Boston Edison RMTs and MDPH NIATs teams collect data independent from one another as a check on the validity of the data. If use of the direct torus vent is warranted, these field teams would normally be on station at the Alert level classification, two classifications prior to actual use of the vent. There are also effluent monitors available for use at Pilgrim which would allow for alerting of the plant and the field teams to the magnitude of the release of activity from use of the direct torus vent.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-82: "[T]here were some serious deficiencies as noted in the recent FEMA report [for the emergency response exercise held on October 12-13, 1989] with regards to communications directly to area 2, the EBS system and the siren sounding coordination."

Source: September 6, 1990, Public Meeting Tr. pp. 85-86

Boston Edison Response:

The deficiencies identified by FEMA were corrected in the May 1990 remedial exercise. Based upon the remedial exercise, FEMA stated in a June 5, 1990 letter to Charles V. Barry of the Massachusetts Office of Public Safety that "[t]he Commonwealth adequately demonstrated the ability to provide accurate and timely information, using the Emergency Broadcast System, to the citizens of the Emergency Planning Zone towns...."

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-83: "[E]ach time we had to depend on area 2 EBS and the siren system [during the emergency response exercise on October 12-13, 1989], we [Marshfield] were at a loss. We couldn't trust the information we were getting, it was coming from different directions and in most cases it was not accurate."

Source: September 6, 1990, Public Meeting Tr. p. 86

Boston Edison Response:

This item was identified in the FEMA Exercise Report for the October 1989 exercise. The deficiencies cited by FEMA were corrected in the May 1990 remedial exercise. As stated in a June 5, 1990 letter from FEMA to Charles V. Barry of the Massachusetts Office of Public Safety, "[t]he Commonwealth adequately demonstrated the ability to provide accurate and timely information, using the Emergency Broadcast System, to the citizens of the Emergency Planning Zone towns...."

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-84: "Our harbor master is currently working with a borrowed VHF radio from the fire department and for the size of operation that he patrols and the difficulties in inclement weather, we definitely foresee that we will have a problem. We would ask your help in dealing with that problem."

Source: September 6, 1990, Public Meeting Tr. p. 86

Boston Edison Response:

Boston Edison has approved the purchase of a base radio with an antenna and three portable radios with chargers for the Marshfield Harbormaster. The Town of Marshfield was made aware of this decision on September 21, 1990.

CORRECTIVE ACTIONS:

Boston Edison will supply a base radio with antenna and three portable radios with chargers.

SCHEDULE FOR COMPLETION:

A purchase order will be issued in November 1990, and radios will be provided consistent with vendor availability.

Item No. Tr-85: "I'm very concerned with the status of all the towns in terms of the school plans."

Source: September 6, 1990, Public Meeting Tr. p. 86

Boston Edison Response:

See Response to Item Tr-29.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-86: "And to hear tonight that none of the schools have an approved plan is absolutely appalling."

Source: September 6, 1990, Public Meeting Tr. p. 86

Boston Edison Response:

See Response to Item Tr-29.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-87: "[W]e would like to see the one school that inside the EPZ in Marshfield stay in terms of evacuation, inside the town of Marshfield."

Source: September 6, 1990, Public Meeting Tr. p. 87

Boston Edison Response:

See Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-88: "To send our [Marshfield] students to Wellesley, to Needham, wherever, whenever it's decided will only cause more difficulties for us and the parents of Marshfield."

Source: September 6, 1990, Public Meeting Tr. p. 87

Boston Edison Response:

If Marshfield children are transferred, as the plans call for, at the Site Area Emergency classification level, no monitoring or decontamination is required because there would not have been an offsite radioactive release. However, if Marshfield children had not been transferred out of the EPZ at the time that their school's subarea was identified for a precautionary transfer, they would first proceed to the Wellesley Reception Center for monitoring and, if necessary, decontamination. Town of Marshfield IP-06 (Draft-2, September 1990), entitled "Marshfield School Department" p. 8. After completion of monitoring and decontamination, the Marshfield children would then be transported to their host school. Therefore, there is no need to provide any monitoring equipment at host school locations.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr. 89: "BECO has made considerable effort to provide equipment and assistance during the 32-month shutdown but its enthusiasm may have waned since the allowance of the plant to operate by your Commission."

Source: September 6, 1990, Public Meeting Tr. p. 89

Boston Edison Response:

Boston Edison's enthusiasm towards assisting the offsite communities has not "waned" since the NRC granted Pilgrim permission to restart on December 21, 1988. Since restart, Boston Edison has, among other things, made improvements to a number of facilities, provided equipment to the towns and the Commonwealth, and assisted the towns and the Commonwealth in drafting and updating numerous emergency plans and procedures. Specific examples of significant emergency planning improvements since restart include:

- Renovation of the Wellesley DPW as the third reception center.
- Renovation of the Commonwealth Area II EOC.
- Training and retraining of thousands of emergency workers.
- Renovation of Plymouth Airport to serve as an Emergency Worker Monitoring and Decontamination Station.
- Designation and renovation of Taunton High School to serve as a reception center.
- Donation of four-wheel drive vehicle for Saquish/Gurnet Association.
- Purchase of additional equipment for the towns.
- Revision of plans, procedures and submittal to FEMA for review.
- Update of the ETE.
- Special needs survey and special needs enhanced ID program
- Upgrade of PIB to calc-1 format (scheduled for distribution Nov. 1990).

Item No. Tr-89: (cont.)

Therefore, as is stated in the September 28, 1990 letter to Ms. Alba Thompson (attached to Response to Item Tr-14), Boston Edison has made considerable efforts to assist the towns and the Commonwealth with emergency planning for Pilgrim and will continue to do so in the future.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-90: "[T]he reception center at Bridgewater State College is not adequately prepared. It's mandated by FEMA and NRC to be able to receive 20 percent of the population within 12 hours. Kingston cannot get people over there in that time, and if they were there, the feeling is that they can't be handled."

Source: September 6, 1990, Public Meeting Tr. pp. 92-93

Boston Edison Response:

See Response to Item Tr-54. The Bridgewater State College Reception Center is equipped for monitoring and registering 20% of the evacuated population designated to go there within a twelve hour period. See Town of Bridgewater RERP (Draft-5, December 1, 1989), section II-J, p. J-3.

To clarify the issue of evacuation time for the Town of Kingston, the Pilgrim Station Evacuation Time Estimates and Traffic Management Plan Update, Rev. 1, (July 15, 1990) estimates that, under various scenarios, it will take between four hours and ten minutes and six hours and forty minutes to evacuate the Town of Kingston. See also Town of Kingston RERP (Rev. 8, May 15, 1990), section J, Figure J-7.

The time it would take evacuees from Kingston to arrive at the reception center, however, is not relevant to the adequacy of the facility. The twelve hour criterion for the monitoring of evacuees does not begin until the evacuees arrive at the reception center.

The Bridgewater Fire Department is tasked with performing monitoring and decontamination activities for the Town of Bridgewater. As a result of that responsibility the Fire Department received training in December 1988, and January and April of 1989. In August 1989, the Bridgewater Fire Department determined that they would not participate in any program considered an additional duty to their normal firefighting mission, that is, the Fire Department would respond to a radiological emergency if it occurred but would

Item No. Tr-90: (cont.)

not participate in future training or drill and exercises. See September 28, 1989 letter from Mr. Frank Maher (Town of Bridgewater Emergency Management Officer) to Mr. Robert Boulay (Director, MCDA). In early 1990, the Bridgewater Fire Department determined that they could not support all of the positions which had previously been assigned to the Fire Department because of manpower shortages. The Fire Department procedure was revised to reflect this shortage and incorporate actions to request manpower assistance should it be necessary. See Town of Bridgewater IP-04 (Draft-6, June 15, 1990), entitled "Fire Department" pp. 1, 2, 4-5. In August 1990, the Town of Bridgewater in correspondence to MCDA made it very clear that the Fire Department could support only three positions and requested assistance from MCDA in supporting the unfilled monitoring and decontamination positions. See August 27, 1990 letter from Mr. Frank Maher (Town of Bridgewater Emergency Management Officer) to Mr. Robert Boulay (Director MCDA). The Commonwealth has recently provided correspondence to the Town indicating the use of Executive Orders to allow for mutual aid assistance from surrounding towns in order to alleviate the manpower shortage.

Boston Edison is aware that the Massachusetts National Guard has an "Engineering unit" located in the Bridgewater area. As discussed in Tr-70, the National Guard has demonstrated their willingness to provide personnel to perform the same types of functions that are in short supply in the Town of Bridgewater. We believe this approval is both logical and feasible and could be enacted as a final solution to this issue. Boston Edison would be willing to provide the same considerations (provision of training and resultant compensation) to the National Guard that are provided for their personnel assigned to Wellesley should the Commonwealth agree with this approach.

Item No. Tr-90: (cont.)

CORRECTIVE ACTIONS:

Boston Edison will take action over the next several months to actively encourage and seek support from MCDA and the Commonwealth Office of Public Safety to incorporate the "Engineering unit" of the Massachusetts National Guard into the Town of Bridgewater's Emergency Organization to provide sufficient manpower to accomplish monitoring and decontamination activities at the Reception Center.

SCHEDULE FOR COMPLETION:

Boston Edison does not have the authority to conclude this issue.

TY-90

TOWN OF BRIDGEWATER

OFFICE OF SELECTMEN



CAROLYN MORWICK, Chairman
ROGER P. PROVOST, Clerk
-DAVID A. CANEPA, Member
(808) 697-0919

Bridgewater, MA 02324

FRANK MAHER
Executive Secretary
(808) 697-0920

September 28, 198

Mr. Robert Boulay, Director
Massachusetts Civil Defense Agency
Office of Emergency Preparedness
P.O. Box 1496
Framingham, MA. 01701

Dear Mr. Boulay,

Recently, a situation has developed which impacts the level of demonstration of the Town of Bridgewater in the upcoming Federally Evaluated Exercise on October 12.

The matter I wish to bring to your attention concerns the participation of the Bridgewater Fire Department in Town emergency plans and procedures. Fire Department personnel have undergone necessary training, are capable and would respond in a real emergency if called upon. However, recent developments have resulted in a potential dispute between the Town and the Fire Department union. Presently, the union does not wish to participate in any programs which they consider an addition to their duties. The Radiological Exercise is considered by the fire fighter's union an additional duty.

The Town of Bridgewater therefore requests that the Commonwealth identify and provide an augmentation force to conduct monitoring and decontamination associated with our reception center functions. It is our hope that this can be accomplished quickly enough to allow a demonstration on October 12.

Mr. Boulay
Page 2

September 28, 1989

We would like to emphasize that the Town remains committed to serving as a reception community and that we perceive this issue as a short term problem associated with exercise demonstration. Please inform me as soon as possible as to how the Commonwealth will assist.

Thank you for your attention to these emergency planning matters.

Sincerely,

Carolyn Tronville

Chairman, Board of Selectmen

/e
cc: Charles Barry, Secretary of Public Safety
Mr. Lou Parry, Bridgewater State College
Mr. Ron Varley, Boston Edison



TOWN OF BRIDGEWATER
OFFICE OF CIVIL DEFENSE
BRIDGEWATER, MASS. 01884

204 FORM, Civil Defense Division
STATE OF MASS. Emergency Management Office

TELEPHONE NO. 697-6191

August 27, 1990

Mr. Robert Bouley, Director
Commonwealth of Massachusetts
Civil Defense Agency
Office of Emergency Preparedness
400 Worcester Road
Post Office Box 1496
FRAMINGHAM, MA 01701

Dear Mr. Bouley:

I am forwarding to you a copy of the Response Actions and Staffing Requirements for the Decontamination and Radiological Monitoring Response Actions as it pertains to the Town of Bridgewater's R.E.R.P.

After much discussion with the Fire Chief, Ass't EMO and others, I have determined that we can only supply personnel from our Fire Department for the following positions without jeopardizing the Fire Department's ability to perform it's primary mission.

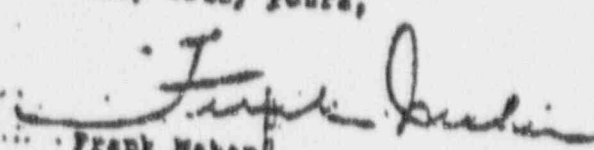
- Fire EOC Representative
- Fire Dispatcher
- Dosimetry Coordinator

Therefore, I am requesting your assistance in identifying and assigning the remaining 36 required personnel as listed in the enclosed response action for assignment and training, to allow us to perform the mission assigned to the Town as it pertains to the R.E.R.P.

After you have made your determination in this matter, we request you furnish us with the names and addresses of these personnel, both male and female, so that we may update our notification roster and start scheduling them for training, which is due to commence on or about September 15, 1990.

Thank you for your prompt consideration in this matter.

Very truly yours,


Frank Maher
Emergency Management Officer

2
enclosures

Item No. Tr-91: "[T]oday at Bridgewater State College [Reception Center] the toilet and shower accommodations are still in the storage boxes."

Source: September 6, 1990, Public Meeting Tr. p. 93

Boston Edison Response:

The toilet and shower accommodations at the Bridgewater State College Reception Center have been in existence since the gymnasium was constructed. Boston Edison did not construct any new toilets or showers for the Bridgewater Reception Center. Boston Edison did, however, refurbish these facilities in order to enhance the operability of the reception center. The speaker may have been referring to a bladder which is stored in a box at the Reception Center. During facility activation, the bladder would be connected to the building's plumbing system (as previously modified to accept connections) to contain contaminated water.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-92: "There is no change of clothing to be provided for children who may be evacuated there [Bridgewater Reception Center]."

Source: September 6, 1990, Public Meeting Tr. p. 93

Boston Edison Response:

Change of clothing is provided at the Bridgewater Reception Center in the form of temporary disposable clothing, which can be folded or cut to fit various sizes. These are available at the Bridgewater Reception Center for decontaminated individuals to wear while they are transported to Congregate Care Centers. Permanent change of clothes for decontaminated individuals are provided by the American Red Cross at Congregate Care Centers.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-93: "[T]here is none of this potassium iodine [sic] in storage at Bridgewater State College."

Source: September 6, 1990, Public Meeting Tr. p. 93

Boston Edison Response:

Potassium iodide (KI) is not stored at the Bridgewater Reception Center because Commonwealth policy does not permit distribution of KI to the general public. See Response to Item Tr-43.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-94: "[W]e don't even have permission of the parents of these children [at the reception centers] to administer this [potassium iodide] so this is a very vague point."

Source: September 6, 1990, Public Meeting Tr. p. 93

Boston Edison Response:

See Responses to Items Tr-43 and Tr-93.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-95: "[T]here are no double paper masks to be handed out to people at the Bridgewater State College [Reception Center] in case the plume of radiation heads in that direction...."

Source: September 6, 1990, Public Meeting Tr. pp. 93-94

Boston Edison Response:

There is no regulatory requirement or need to provide paper masks to persons at a reception center.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-96: "There are simply not enough school busses around to be available to adequately take care of the school children in Kingston. There is a Catholic high school, there is an elementary school and there is a regional high school quite widely separated."

Source: September 6, 1990, Public Meeting Tr. p. 94

Boston Edison Response:

There are two private and two public schools in Kingston. As described in Town of Kingston IP-06 (Draft-6, Feb. 23, 1990), entitled "School Departments" and IP-41 (Draft-3, Mar. 7, 1990), entitled "Sacred Heart Schools", these schools contain approximately 1,278 children and 1,841 adults (including students classified as adults for transportation purposes). The two private schools (Sacred Heart Elementary and Sacred Heart Jr./Sr. High School) own twelve buses that would be used to transport the individuals under their care. Individuals at Kingston's public schools have been preassigned to buses supplied by Ryder Student Transport. Ryder has entered into an LOA with the MCDA to make 200 buses available during an emergency, and it is currently planned that fifty of the buses may be needed to transport individuals from the Kingston public schools. In total, these buses are sufficient to evacuate the Kingston schools.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-97: "We have not yet been able to identify the special needs people, let alone locate them. And by special needs, we're talking also about people who are hearing impaired who may not even hear the sirens, who don't turn on the radio or T.V., mainly elderly people, handicapped people."

Source: September 6, 1990, Public Meeting Tr. p. 94

Boston Edison Response:

See Responses to Items Tr-2, Tr-7, Tr-8 and Tr-12.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-98: "Also, there are a good number of people who do not own automobiles or have access to transportation. To my knowledge, that hasn't been addressed by anyone."

Source: September 6, 1990, Public Meeting Tr. p. 94

Boston Edison Response:

There are several provisions for the transportation of individuals within the Pilgrim EPZ who do not own or have access to transportation.

- 1) Buses, vans, and/or ambulances would be made available to evacuate individuals in schools, licensed day-care centers, health care facilities, group homes, and camps. See Response to Item Tr-117.
- 2) There are four designated pick-up points and fourteen bus evacuation routes within the EPZ from which transportation-dependent individuals would be picked up for transport outside of the EPZ. These bus routes are run at spaced intervals, with additional runs conducted as needed. See, e.g., Town of Duxbury IP-09 (Draft-5, June 29, 1990), entitled "Transportation", p. 24.

Bus route and pick-up locations were published by subarea in the Public Information Brochure distributed to residences and businesses within the EPZ in Fall 1989, "Emergency Information for Neighbors of Pilgrim Nuclear Power Station", pp. 11-22. Contact phone numbers for additional transportation assistance is referenced at page 2 of the brochure. Information with regard to evacuation bus routes and pick-up points will again be distributed within the Public Information 1991 calendar, "An Emergency Plan for Your Protection for Neighbors of Pilgrim Nuclear Power Station", for mailing throughout the EPZ in Fall 1990. Furthermore, the prescribed EBS message for evacuation advises persons within the EPZ that, "For those needing transportation assistance, bus routes and pick-up points have been established. Detailed information is contained in public information materials mailed to your home

II, No. Tr-98: (cont.)

or contact your local Civil Defense Agency for assistance", followed by contact phone numbers for each of the five EPZ town Civil Defense agencies. See MCDA IP-12 (Draft-04, May 14, 1990), entitled "Public Affairs Officer" p. 27 for prescribed EBS messages. Draft 1990 public information flyers for transients indicate that transportation assistance may be provided by contacting the "nearest Civil Defense Office"; local Civil Defense phone numbers are listed in the flyer, as well as an "800" number for the MCDA.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-99: "Do we identify the people who have no one that can give them a ride out of town? It's left up in the air."

Source: September 6, 1990, Public Meeting Tr. p. 4

Boston Edison Response:

See Response to Item Tr-98.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-100: "As far as we know, there is no adequate training for the emergency personnel [in Kingston]...."

Source: September 6, 1990, Public Meeting Tr. p. 94

Boston Edison Response:

Designated emergency personnel in Kingston have undergone training at least once, with the exception of tow truck drivers who are scheduled to be trained this year. In addition, annual retraining has begun in Kingston pursuant to the Commonwealth's Comprehensive Training Program which is described in detail in Response to Item Tr-25.

CORRECTIVE ACTIONS:

Conduct training for tow truck drivers.

SCHEDULE FOR COMPLETION:

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Tr-101: "[E]ven the report there says we're short one position [in the Kingston EOC]."

Source: September 6, 1990, Public Meeting Tr. p. 94

Boston Edison Response:

At the time of the September 6, 1990 Public Meeting, the Kingston Transportation Staging Area Manager's position was unoccupied. This position, which does not operate out of the EOC, has since been filled. Kingston Civil Defense officials have confirmed that primary and back-up emergency workers have been identified to fill all EOC and field positions, and, in fact, a "surplus of 10-15 personnel" currently exists (per conversation with Kingston Deputy Civil Defense Director Frederick E.S. Woodworth, September 22, 1990).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-102: "And the position [in the Kingston EOC] that's filled in on a part-time basis by an elderly gentlemen."

Source: September 6, 1990, Public Meeting Tr. pp. 94-95

Boston Edison Response:

The speaker's statement is unclear. As noted in the Response to Item Tr-101, all Kingston Emergency Response Organization positions are currently filled, and, in fact, a surplus list of volunteer names is being maintained.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-103: "The teaching personnel at the [Kingston] elementary school have not been trained on how to handle the kids."

Source: September 6, 1990, Public Meeting Tr. p. 95

Boston Edison Response:

The Kingston Elementary School Committee has given its approval for scheduled training of elementary school teachers to begin on October 9, 1990. Anticipated attendance is high (thirty-three), and Boston Edison will compensate any teacher who undergoes training.

The approved Commonwealth emergency worker training program does offer training for teachers. Draft procedures for teachers have been developed which provide checklists for: (1) ensuring accountability of students; (2) assisting in transporting students; (3) supervising students during relocation, evacuation or sheltering; and (4) releasing students to parents. See Town of Kingston IP-06 (Draft-6, February 23, 1990), entitled "School Departments". Under the current Offsite Radiological Response program for Pilgrim Station, teachers are responsible for gathering their students and accompanying them on buses out of the EPZ to a host facility before there is any release of radioactivity into the environment.

It is also important to remember that the Kingston procedures call for only sixteen teachers and one principal out of seventy-two elementary school staff to assist in transferral of elementary school students out of the EPZ to their host schools. See Town of Kingston IP-06 (Draft-6, February 23, 1990), entitled "School Departments". Moreover, the training that the teachers undergo makes it clear to teachers that, if the teachers are residents of the EPZ, any children they may have in school would be transferred out of the EPZ at the same time.

Item No. Tr-103: (cont.)

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-104: "We don't even know that they [Kingston Elementary School teachers] will participate."

Source: September 6, 1990, Public Meeting Tr. p. 95

Boston Edison Response:

See Response to Item Tr-103.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-105: "Some of them [Kingston Elementary School teachers] say they're going to leave and go home and take care of their own family, let the parents of these children do what they want with the kids. We don't know what to do. There's no decision been reached on that."

Source: September 6, 1990, Public Meeting Tr. p. 95

Boston Edison Response:

See Response to Item Tr-103.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-106: "We even hear that there are some [Kingston] police and fire people who are saying the same thing -- get out of town, everybody's on their own. That's not right."

Source: September 6, 1990, Public Meeting Tr. p. 95

Boston Edison Response:

Implementing procedures for the Town of Kingston Police and Fire Departments have undergone several reviews by each agency. In addition, the Town of Kingston Police and Fire Departments' personnel have undergone Radiological Emergency Response Plan (RERP) training and are aware of their emergency preparedness responsibilities. Annual retraining sessions for both departments have begun as reflected in the applicable training attendance records, and introductory training for new personnel has also been accomplished. Further, these individuals carried out their assigned responsibilities during the October 1989 exercise for Pilgrim.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr--17/2: "The [Kingston] communications system in our view is faulty. Other people here this evening have commented on the inadequacy of the communication system which I guess is left up to begging and borrowing various radio equipment which is subject to failure. Even today, the equipment in Kingston was out in service, didn't know when it was going to be repaired."

Source: September 6, 1990, Public Meeting Tr. p. 95

Boston Edison Response:

There are both primary and backup communications systems among the MCDA facilities, Well .ley Reception Center, five EPZ towns, and two reception center communities. This network of systems consists of a network of dedicated (DNN) telephones, fax machines, and radios, and was effectively demonstrated during the October 1989 exercise. Annual tests are scheduled on the equipment to the EOCs, and monthly tests occur on the notification equipment to 24-hour dispatch centers. In addition, the equipment and backup radios are polled frequently to ensure all lines and equipment are in order.

Although Boston Edison has no knowledge of currently out-of-service communications systems, perhaps the speaker was referring to two recent temporary failures of the backup notification radio located in the Kingston Fire department. On August 5, 1990, the tone board on the backup radio failed; it was removed by Boston Edison personnel on August 6, 1990 and placed back in service August 7, 1990. On August 24, 1990, the power supply to this same radio failed; Boston Edison personnel worked on the unit August 28, 1990 and had it back in service August 29, 1990. To the best of our knowledge, no further failures of the backup radio in the fire department have occurred. The primary notification system has remained operable, as well as the secondary backup notification of commercial telephones.

However, if any broken equipment does exist and it fell within the purview of the Civil Defense Comprehensive Grant Agreement signed between Boston

Item No. Tr-107: (cont.)

Edison and the Town of Kingston, Boston Edison would repair it (see attached Civil Defense Comprehensive Grant Agreement). The Town has simply to follow procedures provided to it by Boston Edison and repairs would be made expeditiously. In fact, over the last two years, Boston Edison has repaired the generator for the Kingston EOC, obtained a quarterly maintenance contract for the photocopy machine in the EOC, and repaired the fax machine and interior phone lines at the EOC. Boston Edison has also repaired six fire department portable radios and one police department portable radio in Kingston.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

BOSTON EDISON COMPANY
CIVIL DEFENSE COMPREHENSIVE
GRANT AGREEMENT

WHEREAS, the Town of Kingston, Massachusetts ("the Town") has certain responsibilities under state law to establish a local organization for civil defense and perform civil defense functions as defined in Massachusetts General Laws, Spec. L. Chapter 31; and

WHEREAS, the civil defense responsibilities of the Town's local organization for civil defense include emergency planning and preparedness in regard to Boston Edison Company's ("the Company") Pilgrim Nuclear Power Station ("Pilgrim Station") located in Plymouth, Massachusetts; and

WHEREAS, it is in the interest of both the Company and the Town for the Company to provide to the Town various services, equipment, supplies, materials and funds so that the Town may fulfill its civil defense responsibilities, including its emergency planning and preparedness responsibilities; and

WHEREAS, the Town is willing and entitled to accept such services, equipment, supplies, materials and funds by way of grant for purposes of civil defense, as defined in and permitted by Massachusetts General Laws, Spec. L. Chapter 31;

NOW THEREFORE, in accordance with the provisions of NUREG 0654 FEMA-REP., Rev. 1 and Massachusetts General Laws, Spec. L. Chapter 31, Section 15, and for and in consideration of the mutual promises and agreements contained herein the Company and the Town agree as follows:

1. Grant Assistant Provided: The Company agrees, subject to the terms and conditions set forth herein, to provide the Town with services, equipment, supplies, materials and funds by way of grant to assist the Town in meeting its civil defense responsibilities under various state and federal laws and regulations as such pertain to the preparation and implementation by the Town, its employees and authorized representatives of the Town's Radiological Emergency Response Plan. For purposes of this Comprehensive Grant Agreement the term "authorized representatives" includes volunteer workers who are identified in the Town's Radiological Emergency Response Plan as having a responsibility during a response to an incident at Pilgrim Station.

2. Authorized Use of Comprehensive Grant Funds: The parties hereto agree that the funds provided by the Company to the Town, pursuant to this Comprehensive Grant Agreement shall be used exclusively for the specific purposes of civil defense, as defined in Massachusetts General Laws, Spec. L. Chapter 31, and in accordance with 10 CFR 50, Appendix E, entitled "Emergency Planning and Preparedness for Production and Utilization Facilities" and NUREG 0654, for the express benefit and for the protection of the health and safety of the residents of the Town in preparing for and in response to a radiological emergency at Pilgrim Station or any other civil defense function, all as required by state and federal laws and regulations.

3. Compensation for Training and Drill Expenses: The preparation and implementation of the Town's Radiological Emergency Response Plan will require that the Town's employees and authorized representatives, in conjunction with the Company and various state and federal agencies,

participate in training and periodic drills. The Company agrees to compensate the Town for all payments which represent wages paid or required to be paid by the Town to its employees or authorized representatives during their participation in training and drills. Payments for wages shall not exceed rates or limitations under which the Town normally compensates its employees and the Company shall pay the Town for only those wage expenses which represent payment for work performed outside the employee's or authorized representative's normal work schedule.

It shall be the responsibility of the Town's director of its local civil defense organization to compile, review and approve in writing all requests for payments of wages described herein and to submit said requests to the Company on a monthly basis. The Company shall make payment to the Town within forty-five (45) days of its receipt of the Town's request for payment. Upon receipt of payment from the Company, it shall be the Town's responsibility to disburse the funds to the named recipients in accordance with state and federal wage laws, rules and regulations.

4. Accounting For Grant Funds: The Town shall keep and maintain such books, records and other documents as shall be necessary to reflect and disclose fully the amount and disposition of any funds provided by the Company under this Agreement, including the total cost and description of activities paid for, in whole or in part, with such funds, and the amount and nature of all expenditures related to such activities which are supplied or to be supplied by other sources. All such books, records and documents shall be available at office of the Town Treasurer for

inspection, copying, audit and examination at all reasonable times by any duly authorized representative of the Company.

5. Grant of Services, Equipment, Supplies and Materials: From time to time upon receipt of a written request from the Town's director of its local civil defense organization the Company may grant to the Town services, equipment, supplies and materials which will assist the Town in fulfilling its civil defense responsibilities, including the preparation and implementation of the Town's Radiological Emergency Response Plan. Any such grant shall be made in writing by an authorized employee or representative of the Company. Such writing shall describe in reasonable detail the services, equipment, materials or supplies which the Company shall provide to the Town. All such equipment, materials or supplies shall be delivered to the Town and title of all such equipment, materials or supplies shall pass to the Town upon delivery.

During the term of this Comprehensive Grant Agreement the Company, at its expense, shall maintain and repair all items provided to the Town under this Comprehensive Grant Agreement. If an item cannot be repaired and is no longer capable of performing its intended function, the Company, at its expense, shall replace said item with one of a like kind, which is capable of performing the intended function of the original item provided to the Town.

6. Term of Comprehensive Grant Agreement: This agreement shall remain in effect until such time as : 1) Pilgrim station is decommissioned; or 2) the Company no longer holds the NRC license to operate Pilgrim Station;

or 3) the Town is no longer actively and in good faith supporting and participating in the emergency planning and preparedness for Pilgrim regulations.

7. Severability: The invalidity of any section, subsection, clause or provision of this Comprehensive Grant Agreement shall not affect the validity of the remaining sections, subsections, clauses or provisions hereof.

8. Amendment of Grant Agreement: This Comprehensive Grant Agreement, or any part hereof, may be amended from time to time hereafter only in writing executed by both parties.

9. Disclaimer of Responsibilities: The Town acknowledges that the obligation of the Company is limited to providing grant funds in the manner and on the terms set forth in this Comprehensive Grant Agreement. Nothing in this Comprehensive Grant Agreement, nor any act of either the Company or the Town, shall be deemed or construed by either of them, or by third persons, (1) to create any relationship whatsoever involving the Company including, but not limited to, employment, agency or contractor relationships between the Company and an employee or authorized representative of the Town or (2) except as provided in Section 1 above, to create any rights on the part of the Town or any third person with respect to the Company or its property.

10. Waiver: No act or failure to act by either party shall be deemed as a waiver of said party's rights and obligations under this Comprehensive

Grant Agreement unless the same be in writing, signed by the said party and expressly stated to constitute such waiver.

11. Notices: All amendments, notices, requests, objections, waivers, rejections, agreements, approvals, disclosures and consents of any kind made pursuant to this Comprehensive Grant Agreement shall be in writing. Any such communication shall be deemed effective for all purposes as of the date such communication is delivered to the office of the addressee by hand or by certified mail return receipt requested, addressed as follows:

(i) For the Town:

Board of Selectmen
Town Hall
Kingston, Massachusetts 02364

(ii) For the Company

Senior Vice President-Nuclear
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

12. Effective Date: This Comprehensive Grant Agreement shall be deemed to have been accepted, and shall become effective, as of the date this Comprehensive Grant Agreement is executed and dated by the Town.
13. Opinion of Counsel: Upon the execution of this Comprehensive Grant Agreement by the Town, the Town shall deliver to the Company an opinion of counsel stating that: 1) it is within the corporate power of the Town to enter into and execute this Comprehensive Grant Agreement; 2) all the

proper and necessary actions have been taken to authorize the signing and delivery of the Grant Agreement by the Town; and 3) when accepted by the Town, the Comprehensive Grant Agreement will become a valid and binding agreement of the Town. The Company upon execution of the Comprehensive Grant Agreement shall give a similar opinion of counsel if requested by the Town.

14. Entire Agreement: This Comprehensive Grant Agreement constitutes the entire agreement between the parties hereto and supersedes all prior oral or written agreements between the parties hereto with respect to the subject grant.

IN WITNESS WHEREOF, the undersigned hereunto set their respective hands this 19th day of January, 1988.

BOSTON EDICON COMPANY

By [Signature]

Its Senior Vice President-Nuclear

THE TOWN OF KINGSTON

By [Signature]

By Edward H. Valler

By [Signature]

Its: Board of Selectmen

Item No. Tr-108: "I would recommend, having spent many years with the Bell System, that it be mandatory that a private line telephone network be installed and funded by Boston Edison and the Government to connect all the official people in the Town of Kingston and the surrounding communities, all the buildings where large concentrations of people exist such as shopping malls, nursing homes, schools; they should be in these people's homes as well as their official work places."

Source: September 6, 1990, Public Meeting Tr. pp. 95-96

Boston Edison Response:

See Response to Item Tr-107.

Boston Edison has provided extensive communications capabilities to the local communities that exceed the capabilities of a private line telephone system. A dedicated facsimile network has been installed in all local town Emergency Operations Centers and 24-hour dispatch centers to provide notification and follow-up information to the towns. Boston Edison has installed a dedicated redundant radio system that provides not only the capability for the utility and the Commonwealth to communicate with the towns, but also allows the towns to communicate among themselves. Boston Edison has provided a state-of-the-art private line notification system to provide notification, verification and follow-up information to the towns. The systems provided by Boston Edison have been designed to be secure and reliable. Both the radio and telephone networks have built-in redundancy and are monitored by computer systems to ensure that communications channels are available and operating.

Item No. Tr-108: (cont.)

Boston Edison has also provided Tone Alert radios to shopping malls (five at Independence Mall), nursing homes, schools, major employers, day care centers and camps which would provide these locations with the latest information available over the Emergency Broadcast System network. Boston Edison believes that this equipment provides information in a more timely manner than a telephone system. Finally, tests are currently underway by Boston Edison to determine the best radio communications for the Kingston School Superintendent's office for back-up communications for contacting each of the schools in Kingston in the event of an emergency.

CORRECTIVE ACTIONS:

Boston Edison will finalize with the Town of Kingston the type of radio equipment necessary to perform the function. Upon identification of a suitable system, Boston Edison will execute a purchase order with a suitable vendor.

SCHEDULE FOR COMPLETION:

Radio system will be installed consistent with vendor availability of the ordered radio system.

Item No. Tr-109: "I think you ought to go back and review the private line telephone network that's purchased and paid for by many, many Federal Government agencies -- defense, state, everywhere -- and they work and they can be maintained free. I think that's a serious shortcoming in the whole emergency preparedness."

Source: September 6, 1990, Public Meeting Tr. p. 96

Boston Edison Response:

See Response to Item Tr-108.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-110: "They talk about shelters within the Town of Kingston and a few of them are totally inadequate. One was identified as the local Burger King."

Source: September 6, 1990, Public Meeting Tr. p. 96

Boston Edison Response:

The Burger King in the Town of Kingston is not identified as a shelter in the Kingston Shelter Implementation Program. The Burger King appeared only in a December 1987 study prepared by Stone and Webster Engineering Corporation for Boston Edison to identify potential public shelters in the EPZ.

Information from the Stone and Webster study was used to permit a more thorough analysis of potential shelters. The program established to identify and secure viable shelter space for the transient population is discussed in Response to Item Tr-147. A complete copy of the Kingston Shelter Implementation Program is on file at the Kingston Civil Defense Agency and Selectmen's Office and was forwarded to FEMA on October 12, 1988. Each of Kingston's six current shelters was selected according to suitability and federal criteria. Letters of Agreement or municipal authorizations have been entered into with shelter owners and are contained in Section III of the Town of Kingston RERP (Rev. 8, May 15, 1990).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-111: "There's no mention of the recently constructed Independence Mall which is a pretty tightly enclosed huge structure which could handle thousands of people on a short-term basis if it were stocked with food, water, bedding, medical supplies, security people and any other thing that might be useful, like entertainment."

Source: September 6, 1990, Public Meeting Tr. pp. 96-97

Boston Edison Response:

The speaker may have confused "short-term" sheltering, an appropriate and normally brief protective action in some emergencies, with "long-term" mass care sheltering. For short-term sheltering appropriate to an emergency at Pilgrim, most homes and public buildings are adequate; provisions for food, medical supplies and beds are unnecessary in short-term sheltering. Further, there are long-term mass care shelters for Pilgrim which match the speaker's description, but, for planning purposes, must be located outside the EPZ. The Independence Mall is located inside the EPZ, preventing its designation as a mass care shelter.

As discussed in Response to Item Tr-110, a Comprehensive Shelter Implementation Program has been developed for the transient population in Kingston who might require sheltering. Therefore, there is no need to include the newly constructed Independence Mall in Kingston's Shelter Implementation Program. However, the Independence Mall is equipped with five Tone Alert radios and, if sheltering were the directed protective action, the Mall could adequately serve as a "short-term" shelter for those individuals in the Mall at the time sheltering was recommended. In addition, the newly constructed Mall has been factored into other aspects of the emergency planning program for Pilgrim. For instance, the ETE has been revised to reflect traffic in and around the Mall: "Pilgrim Station Evacuation Time Estimates and Traffic

Item No. Tr-111: (cont.)

Management Plan" (Rev. 1, July 15, 1979) pp. 2-25, 2-25A and 2-28, Vol. I;
Appendix E, pp. E-20, 21, Vol. II.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-112: "I also have written testimony and I also have a packet for you, Mr. Martin."

Source: September 6, 1990. Public Meeting Tr. p. 102

Boston Edison Response:

To the extent new items appear in the written testimony or attachments they are responded to separately in Section III of this report.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-113: "The violations of 10 CFR 50:47 in the Pilgrim EPZ emergency planning which preclude a finding of reasonable assurance for the Town of Duxbury are as follows:

Number One, the reception center in Wellesley. 'Each organization shall describe the means for registering and monitoring of evacuees at a relocation center in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at the relocation center.'

The National Guard has been charged with the responsibilities of monitoring the evacuees at Wellesley. The National Guard has stated their estimated time of arrival will be 12 hours. MCDA states perhaps the National Guard will arrive in 6 to 12 hours.

In either scenario, it is obvious that the personnel will not be present to perform the necessary monitoring within the mandated time frame. The time factor alone precludes any reasonable assurance as determined by Federal regulations and guidelines."

Source: September 6, 1990, Public Meeting Tr. p. 103

Boston Edison Response:

See Response to Item Tr-70.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-114: "In addition, other blatant deficiencies also exist. The lack of sanitary and decontamination facilities for the handicapped [at the Wellesley Reception Center]."

Source: September 6, 1990, Public Meeting Tr. p. 104

Boston Edison Response:

The Wellesley Reception Center does not lack sanitary facilities for the handicapped. Handicapped sanitary facilities for both males and females at Wellesley are in place. Handicapped persons are monitored at a special handicapped accessible area of the reception center. See Wellesley DPW IP-05, (Draft-3, June 26, 1990), entitled "Wellesley Reception Center" attachment depicting handicapped monitoring area. If decontamination is required, they will be transported to a hospital for the decontamination process. See Wellesley DPW IP-05 (Draft-3, June 26, 1990), entitled "Wellesley Reception Center", "RCMDS Personnel Facility Diagram"; Wellesley Reception Center RERP (Rev. 1, August 8, 1990) pp. 59-60; Wellesley DPW IP-17 (Draft-3, June 26, 1990), entitled "Reception Center Setup".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-115: "[There is a] lack of letters of agreement or signature pages signed by support groups or backup congregate care facilities or transportation providers from the [Wellesley] reception center to the congregate care facilities...."

Source: September 6, 1990, Public Meeting Tr. p. 104

Boston Edison Response:

The congregate care facilities used for the Wellesley Reception Center consist of public schools located in towns surrounding the Wellesley Reception Center (Framingham, Wellesley, Natick, etc.). See Response to Item Ex-7.

The Transportation providers used for transporting evacuees from the Reception Center to the congregate care facilities consist of the Massachusetts Bay Transportation Authority (MBTA). See Wellesley DPW IP-22 (Draft-1, June 26, 1990), entitled "Massachusetts Bay Transportation Authority". It is Boston Edison's belief that MCDA is currently pursuing a LOA with the MBTA for resources. Providers which were used to evacuate personnel out of the Duxbury and Marshfield portion of the EPZ are also used in transporting evacuees from the Wellesley Reception Center to congregate care facilities. See Response to Item Tr-151.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-116: "[There is a] lack of training for the Wellesley EOC personnel."

Source: September 6, 1990, Public Meeting Tr. p. 104

Boston Edison Response:

Wellesley reception center personnel received RERP training prior to the October 1989 exercise. MCDA is currently meeting with individuals who would staff the Wellesley EOC and reception center to schedule training for 1990. This retraining will be conducted pursuant to the Commonwealth's Comprehensive Training Program which is described in detail in Response to Item Tr-25.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-117: "The current bus matrix and letters of agreement prepared by Boston Edison and reviewed by MCDA indicate that 510 busses are required to evacuate the entire EPZ; 384 busses will be necessary for the precautionary transfer of school children alone. Upon careful analysis of the current letters of agreement, there are only 292 busses available within the first two hours. An additional 45 will be available within four hours."

Source: September 6, 1990, Public Meeting Tr. p. 104

Boston Edison Response:

Current EPZ Town school procedures estimate that 361 buses will be needed to evacuate school children and staff. This is based upon an estimated school student and staff population of approximately 17,730 in the EPZ for Pilgrim.

Current EPZ Town procedures (a variety of procedures cover this issue such as: Transportation Officer, School and Health Officer) also estimate that 139 buses will be needed to evacuate day care, nursing home, and other transportation-dependent individuals in the Pilgrim EPZ. This is based upon an estimated population of approximately 3,013 individuals in licensed day care centers and nursing homes, and includes an allowance of 84 buses for special needs, evacuation routes, pick-ups, and Jordan Hospital.

The estimates provided above are based upon extremely conservative assumptions, as discussed in Response to Item Tr-9.

Based upon the above, Table Tr-117-1 identifies the buses needed to evacuate the schools and day care centers and the bus companies assigned to serve their needs. As this table shows, sufficient buses have been assigned to satisfy requirements. Signed original letters of agreement (LOAs) for the transportation schools and day care providers are on file with MCDA.

Table Tr-117-1 also identifies that the 104 buses assigned to serve the needs of health care facilities and other transportation-dependent persons will come from four EPZ staging areas. Table Tr-117-2 illustrates that more than sufficient resources have been assigned to fill the quotas for the

Item No. Tr-117: (cont.)

staging areas. During "on hour" periods there is an excess of 81 buses available and during "off hours" periods there is an excess of 475 buses. Therefore it can be seen that excess buses are available and could be used to supply any unexpected transportation needs that might arise during an emergency.

The data used in tabulating the resources listed in Table Tr-117-2 are conservative. For example, this table does not: 1) identify providers under LOAs who have not been given assignments or have been assigned for Reception Center Staging Areas; 2) account for buses for which there are no corresponding drivers, or drivers with no corresponding buses, identified on the LOA; or 3) list the numerous vans and ambulances that suppliers have agreed to make available. In particular, there are more than 200 vans and lift vans and 80 ambulances available to help transport individuals in health care facilities, special needs individuals, and other transportation-dependent individuals. See also Response to Item Tr-2 regarding transportation needs and resources for special needs individuals.

The criticisms contained on page 104 and Attachment 3 of the September 6, 1990 Public Meeting transcript, are invalid for the following reasons:

- 1) The criticisms do not appear to account for the buses that would be provided by the schools and other facilities themselves.
- 2) The criticisms do not appear to account for buses that are available during school hours and have been designated to evacuate school children during the school day, but which would not be available (or needed) during non-school hours.
- 3) In some cases, the criticisms appear to be based upon out-dated or incorrect information. For example, contrary to the criticisms,
 - a) American Eagle, Brockton, and Medeiros would be able to provide some or all of their buses within two hours. Furthermore, all of the 396 buses designated on Table Tr-117-1 for schools and day care centers have been preassigned.

Item No. Tr-117: (cont.)

- b) Crowell, Foxborough, and Rockland Motors have agreed to make their drivers available.
- c) In the event of an evacuation all Access Control Points and Traffic Control Points procedures permit entry of persons performing essential services (e.g., firefighters, emergency workers, ambulances or transportation buses). Barnstable would therefore be able to provide its buses for evacuation purposes.

Finally, it should be noted that the transportation needs and resources are formally revised on an annual basis to account for changes in population estimates and transportation resources availability although information is gathered and the program maintained on a continual basis. These revisions include updating of facility population estimates, updating letters of agreement and estimated resources for each transportation provider, and ensuring that transportation resource assignments are consistent with transportation needs.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Table Tr-117-1

Transportation Resource Needs and Assignments

<u>Type of Facility</u>	<u>Buses Needed</u>	<u>Supplier</u>	<u>Buses Assigned</u>
Schools	361	Schools	35**
		Ryder	172
		C.A. Phillips	12
		Brook	29
		Crowell	25
		Tremblay	73
		Warrentown	<u>15</u>
		Subtotal	361
Day Care	35	Merritt	16
		Ryder	12
		Day Care	3**
		Barnstable	<u>4</u>
		Subtotal	<u>35</u>
Subtotal Schools and Day Care	396		396

Table Tr-117-1

Transportation Resource Needs and Assignments

<u>Type of Need</u>	<u>Buses Needed</u>	<u>Supplier</u>	<u>Buses Assigned</u>
Health Care Facilities	20	Health Care Facilities Staging Areas	1** 19
			Subtotal 20
Evacuation Routes, Pickup Points, Special Needs, and Hospital	84	Staging Areas	84
Subtotal of Transportation Staging Areas	104		104
Total Estimated Buses*	500		500
Camps	119	Merritt Ryder Sacred Heart Tremblay Crowell Camps	2 64 6 29 17 1
			Total 119

*The Total conservatively assumes that the schools are in session. Camp data is provided for informational purposes only and is not included in the totals. Including the transportation for the camps in the Total would be double counting, because a child cannot be in school and camp at the same time and camps usually operate when the schools are not in session. School transportation needs far exceed camp requirements.

**39 buses provided by user facilities is included in the 500 total bus estimate.

Table Tr-117-2

Transportation Resources for EPZ Staging AreasBuses Available ^{1/}

<u>Supplier</u>	<u>On Hour</u>	<u>Off Hour</u>
American Eagle	4	11
Medeiros	85	97
Fox Tours	2	10
Ingle	8	12
Norfolk-Bristol	1	-
Brockton Area Transit	7	25
Plymouth & Brockton	15	60
Reliable	10	10
Ryder	16	200
Tremblay	13	122
Rockland Motors ^{2/}	11	-
D. Rogers	3	6
Foxborough	10	10
Crowell	-	16
<hr/>		
Totals	185	579

^{1/} Contrary to some of the comments provided at the Public Meeting on September 6, 1990, there is no requirement that the buses be available within two hours, and Boston Edison believes that all available buses should be considered. Nevertheless, it may be noted that, for on-hour and off-hour needs, 107 and 560 buses, respectively, would be available within two hours for the staging areas. Furthermore, most of the buses designated on Table Tr-117-1 for the schools and day care facilities would be available within two hours.

^{2/} Not available in summer.

Item No. Tr-118: "[A] gentleman's agreement is the most accurate description of the current status of host schools. Superintendents of Schools Drs. Kennedy and Tirrell, from Duxbury and Needham, have personally agreed to use the Needham schools as host schools for Duxbury's children."

Source: September 6, 1990, Public Meeting Tr. p. 104

Boston Edison Response:

See Response to Item Tr-77.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-119: "The state has not drawn nor issued letters of agreement with the Town of Needham."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Responses to Items Tr-5 and Tr-77.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-120: "No IPs have been written for Needham nor redrafted for the Town of Duxbury [pertaining to host schools]."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-121: "There has been no training of the Needham personnel."

Source: September 6, 1990, Public Meeting Tr. p. 05

Boston Edison Response:

Before Needham personnel can be trained to perform their roles as a host school community for children from Duxbury, a particular host school in Needham needed to be identified and draft procedures needed to be developed and approved for that host school. As of September 11, 1990, Needham High School has been designated as the host school for Duxbury. Draft procedures have been developed and are in the hands of appropriate Needham officials for review. On October 11, 1990, a meeting is scheduled to discuss any revisions that are needed to the Host School Procedure, as well as to identify host school support staff (Needham personnel). After identification of the Host School Support Staff, training can then be scheduled. Needham personnel will be trained in accordance with the Commonwealth's comprehensive training program described in Response to Item Tr-25. In the meantime, as discussed in Response to Item Tr-5, the Commonwealth's Executive Order for designated host schools remains in effect.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-122: "No maps have been drawn, no instructions have been written, no signs have been printed [for Duxbury host Schools]."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-123: "[T]he Town of Duxbury insists upon and has promised to Needham that our children will be monitored before entering their schools under any circumstances. No equipment is in place."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

If Duxbury children are transferred, as the plans call for, at the Site Area Emergency classification level, no monitoring or decontamination is required because there would not have been an offsite radioactive release. However, if Duxbury children had not been transferred out of the EPZ at the time that their school's subarea was identified for a precautionary transfer, they would first proceed to the Wellesley Reception Center for monitoring and, if necessary, decontamination. Town of Duxbury IP-06 (Draft-9, September 21, 1990), entitled "School Department" p. 10. After completion of monitoring and decontamination, the Duxbury children would then be transported to their host school. Therefore, there is no need to provide any monitoring equipment at host school locations.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-124: "The special needs population has not been identified."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Responses to Items Tr-2, Tr-7, Tr-8 and Tr-12.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-125: "There are not sufficient transportation providers to transport the school children, who are transported first, let alone the special needs population."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Response to Item Tr-117.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-126: "The Wellesley reception center as of July 20, 1990 had no sanitary facilities nor decontamination capabilities for the handicapped."

Source: September 6, 1990, Public Meeting Tr. p. 105

Boston Edison Response:

See Response to Item Tr-114.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-127: "MCDA has not made a determination as to whether or not the designated injured contaminated hospitals have the capability to also handle contaminated handicapped."

Source: September 6, 1990, Public Meeting Tr. pp. 105-106

Boston Edison Response:

MCDA is not the primary agency responsible for this area. The Massachusetts Department of Public Health (MDPH) is the agency responsible for coordinating offsite medical services for contaminated injured individuals. Eleven hospitals have signed letters of agreement with MDPH to provide such services. One of the criterion MDPH used to identify qualified hospitals was that the facility had to be accredited by the Joint Commission on Accreditation of Health Care Organizations (JCAH) in the area of radiation treatment. This organization is recognized nationally as an authority on evaluating hospital capabilities.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-128: "Nowhere in planning are latch-key children considered."

Source: September 6, 1990, Public Meeting Tr. p. 106

Boston Edison Response:

There is no requirement for special consideration of latch-key children.
There are several reasons for this:

- Latch-key children are not readily identifiable by state and local governments. Furthermore, an individual's status as a "latch-key child" is not continuous, but varies from hour-to-hour and day-to-day.
- Local governments have individuals who are designated during emergencies to respond to calls from and assist individuals who may have special needs, including parents who may have latch-key children.
- Parents are responsible for children located in their home, including measures to provide for their evacuation.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-129: "There has been no realistic dose reduction study done of shelters within Duxbury. The so-called shelter study was done on a determination of square footage alone. Mr. Lampart pointed out the ridiculousness of the Percy Walker Pool — 2250 square feet happen to be under water."

Source: September 6, 1990, Public Meeting Tr. p. 106

Boston Edison Response:

There is no regulatory requirement that the relative shielding capabilities of specific, individual structures be evaluated. In Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), LBP-85-14, 21 NRC 1219, 1303 (1985), the Licensing Board stated:

There is no provision...which requires an individualized evaluation of buildings to determine their adequacy for sheltering... If the (responsible state agency) were to undertake such evaluations, its ability to make protective action recommendations would not be enhanced because the individual protective value of a building has no bearing on the decision to shelter or evacuate. Protective action recommendations are based upon the dose projection for the entire population rather than the occupants of any particular building. Evaluation of the protection afforded by structures within the EPZ will not make those buildings more suitable for sheltering or affect the choice of a sheltering option.

The Percy Walker Pool is discussed in Response to Item Tr-75.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-130: "The supposed [sheltering] study merely attempted to make the numbers fit. They needed so many square feet per person, therefore they came up with the appropriate number. No thought was given to the current use of the building or the construction of the building."

Source: September 6, 1990, Public Meeting Tr. p. 106

Boston Edison Response:

See Responses to Items Tr-75 and Tr-129.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

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Item No. Tr-131: "There is a definite need to step back and do a dose reduction study that will determine which buildings effectively act as shelters and which part of those buildings offer the greatest protection to the citizens. This is a goal that is easily attainable at minimum cost. The buildings already exist. Send in an expert who can determine which buildings and what sections will offer protection."

Source: September 6, 1990, Public Meeting Tr. p. 106

Boston Edison Response:

See Responses to Items Tr-75 and Tr-129.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-132: "As of today, September 6, 1990, the Saquish-Gurnet residents and the daily beach population have nothing in place for either evacuation nor sheltering."

Source: September 6, 1990, Public Meeting Tr. pp. 106-107

Boston Edison Response:

As discussed in Responses to Item Tr-4 and Tr-32, arrangements are in place to evacuate the Saquish/Gurnet area.

With respect to sheltering, comprehensive "Shelter Implementation Programs" have been developed at Pilgrim which far exceed applicable regulatory requirements. The Shelter Implementation Program Summary which is located with the Civil Defense Director for Plymouth describes the program for sheltering people on Saquish/Gurnet beaches in the event of an emergency at Pilgrim. This program provides for sheltering-in-place for the resident population in their houses (see Shelter Implementation Program Summary p. 7 and p. 9 of the Table entitled "Plymouth Beach/Recreation Areas and Shelters"). Sheltering for the population on Duxbury Beach (and Saquish Neck also) is described in the Shelter Implementation Program Summary for Duxbury. This program provides for the sheltering of the beach population, which is transient, in nine different locations (mostly schools and other public buildings) with a total capacity to shelter more than 20,000 people (Id., Attachment 1, p. 1). See also Item Tr-147.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-133: "The evacuation busses, if there were any -- there won't be enough busses for that either -- would pick up the transient and transportation dependent population coming off the [Powder Point] bridge on the mainland side of the country's longest wooden bridge [opposite Duxbury Beach]."

Source: September 6, 1990, Public Meeting Tr. p. 107

Boston Edison Response:

Based upon surveys performed for the ETE for Pilgrim, 89% of the individuals using Duxbury Beach arrive by car or motorcycle and therefore would not need to utilize the evacuation buses; another 8.5% arrived by foot or bicycle, and could return to their homes by this method for evacuation; and only 2.5% were dropped-off by car which would represent about 115 people under peak conditions. See ETE, pp. 2-18. Boston Edison is not aware of any more definitive estimates than those contained in the ETE.

There is a bus pick-up point at the west end of the Powder Point Bridge. Town of Duxbury IP-09 (Draft-5, June 29, 1990), entitled "Transportation", p. 24, provides for four bus runs from Powder Point Bridge, which would be sufficient to evacuate the individuals who were dropped off by car. This procedure provides for assessments of any need "for additional routing". It may also be assumed that some ride-sharing would be experienced upon notification to the general public to clear this area.

As discussed in the Response to Item Tr-13 there will be a sufficient number of buses for this and other purposes.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-134: "This objective was found to be one of the two deficiencies cited by FEMA [on the emergency response exercise on October 12-13, 1989]. If I may quote from FEMA, 'The contributing factor which led to the citing of this deficiency for the State and Area II EOC were the confused and incomplete messages to the public via EBS. Problems arose concerning the EBS message.'"

Source: September 6, 1990, Public Meeting Tr. p. 108

Boston Edison Response:

The deficiencies cited by FEMA were corrected in the May 1990 remedial exercise. As stated in a June 5, 1990 letter, from FEMA to Charles V. Barry of the Massachusetts Office of Public Safety, "[t]he Commonwealth adequately demonstrated the ability to provide accurate and timely information, using the Emergency Broadcast System, to the citizens of the Emergency Planning Zone towns...." Additionally, FEMA noted in its August 27, 1990 Final Exercise Assessment at Table 103 on page 106 that deficiency number 2 was resolved.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-135: "On off-site, on-site monitoring, this again is an area that's in violation of 10 CFR 50:47. It is an area of great concern, especially with the added attraction of direct torus venting. I defer to David Dixon's statement [on the direct torus vent] and I also have more complete statements in my written report." [Note: the written report states "off-site monitoring. (See 10 CFR 50:47 (b) (9). See the enclosed information on Direct Torus Venting prepared by David Dixon especially take note of the need to tie any direct venting to emergency planning."]

Source: September 6, 1990, Public Meeting Tr. p. 109

Boston Edison Response:

See Response to Item Tr-81.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-136: "To add to my list of the untrained personnel, number one, the majority of the Duxbury school personnel; number two, the entire emergency worker personnel for the Town of Needham, those that we hope will be Duxbury's host school if the state ever pulls it together; three, the EOC staff for the Wellesley reception center has not yet been trained."

Source: September 6, 1990, Public Meeting Tr. p. 109

Boston Edison Response:

Duxbury School Personnel

As documented in applicable training attendance records, the majority of Duxbury School Department emergency administrative personnel have received training at least once and most have been retrained this year. In fact, during the October 1989 exercise, Duxbury School Department personnel assigned response actions in their program were aware of their duties and performed them adequately. In the August 27, 1990 exercise report, FEMA noted that "[T]he five EPZ communities demonstrated their ability to implement protective actions for both public/private schools and day care centers". Additionally, approximately 50% of Duxbury teachers have also undergone training, and the Duxbury School Superintendent has strongly recommended that Duxbury teachers attend training. All training and retraining is conducted pursuant to the Commonwealth's Comprehensive Training Program which is described in detail in Response to Item Tr-25.

Training of Needham School Personnel

See Response to Item Tr-121.

Training of EOC Staff for the Wellesley Reception Center

See Response to Item Tr-116.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-137: "You state key response personnel have received training. Perhaps this is true, but certainly not the personnel necessary to effectively bring about successful precautionary transfer of the Duxbury school children."

Source: September 6, 1990, Public Meeting Tr. p. 109

Boston Edison Response:

See Response to Item Tr-136.

CORRECTIVE ACTIONS

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-138: "In withdrawing approval of the 1985 RERP, FEMA highlighted six major deficiencies. In spite of the October 12, 1989 exercise and its remedial counterpart on May 25, 1990, five of these deficiencies remain unresolved. They are:

(1) Lack of a reception center for people evacuated to the north. In a memorandum dated October 6, 1989, Robert J. Boulay, whom we've heard tonight, Director of the Massachusetts Civil Defense Agency, outlined the major deficiencies at Wellesley reception center, in which he said, 'preclude a full demonstration of its operational capability and the proposed October 1989 exercise objectives.'

Source: September 6, 1990, Public Meeting Tr. pp. 118-119

Boston Edison Response:

The specific matter identified in this item (the availability of a functioning third reception center) has been resolved. The Wellesley DPW facility has been established as a fully functioning reception center. Facility enhancements funded by Boston Edison include a new, self-contained EOC with full communications and operations capability, remodeled shower/restroom facilities, a fully furnished classroom which doubles as a monitoring and decontamination ready room and other improvements.

Registration, monitoring and decontamination functions at the Wellesley Reception Center were demonstrated in the October 1989 exercise. Annual procedure revisions are presently being reviewed by MCDA. See Wellesley DPW IP-05 (Draft-3, June 26, 1990), entitled "Wellesley Reception Center" and IP-17 (Draft-2, June 26, 1990), entitled "Reception Center Setup".

Item Tr-138 refers to certain "deficiencies" outlined in Mr. Boulay's October 6, 1989 memorandum. Those "deficiencies" were recounted by the speaker in the September 6, 1990 transcript and are addressed below in Responses to Items Tr-139 through Tr-146.

Item No. Tr-138: (cont.)

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-139: "Lack of a signed agreement between Massachusetts Department of Public Works and the licensee on facility enhancements necessary for the garage to function as a reception center."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

Attached is a copy of the signed LOA governing facility enhancements at the Wellesley Reception Center and use of that facility as a reception center.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

GRANT OF LICENSE AND PERMISSION
TO ENTER UPON AND TO USE PROPERTY

On this 6th day of October, 1989, Massachusetts Department of Public Works ("MDPW") and Massachusetts Division of Capital Planning and Operations ("DCPO"), grant to Boston Edison Company ("the Company"), a Massachusetts electric company with its principal place of business at 800 Boylston Street, Boston, Massachusetts 02199, license and permission to enter upon certain of MDPW's facilities and properties for the limited purposes described herein:

1. Permission to Enter Upon Premises: MDPW and DCPO grant license and permission to the Company, and those authorized by it to enter upon property owned by DCPO and controlled by MDPW. Specifically permission is given to enter the facilities known as MDPW Garage, which is located in the Town of Wellesley, Massachusetts. The parties agree that this license and grant of permission is revocable at will by MDPW by giving notice to the Company as provided for in paragraph 12; however, no such notice may be given during a radiological emergency at Pilgrim Station, which shall be declared as such by either Commonwealth, local or Boston Edison Officials as appropriate.

2. Purpose of License and Grant of Permission: In the event of a radiological emergency at the Pilgrim Nuclear Power Station ("Pilgrim Station"), which is located in Plymouth, Massachusetts, and which is owned and operated by the Company, MDPW Garage shall be utilized as a reception center in accordance

with the Area II Radiological Emergency Response Plan ("RERP"). In order to adequately serve as a reception center, it is necessary that certain renovations be made to the MDPW Garage. Accordingly, the purpose of the license and grant of permission is to allow the Company to make the renovations described in Paragraph 3 and to permit the use of MDPW Garage as a reception center as described in Paragraph 4.

3. Renovation of MDPW Garage: The Company shall renovate MDPW Garage so that it is suitable for use as a reception center in the event of a radiological emergency at Pilgrim Station. Such renovation shall be comprised of specific improvements identified below, unless the parties agree otherwise, and shall be completed in accordance with the plans and specifications prepared by the Company and approved by MDPW, MCDA and DCPO. All contractors performing the renovation work shall be subject to the prior approval of the MDPW.

Emergency Operations Center (EOC)

- ° Boston Edison will convert an existing storage area of approximately 2400 square feet into an Emergency operations center. The EOC will include space and furniture for staff positions, status boards and maps.

Dining Area

- ° Boston Edison will upgrade the existing dining area and provide new furniture.

Berthing Area

- ° Boston Edison will upgrade the area currently designated Classroom II. The Executive Office of Public Safety has agreed to provide necessary furnishings.

Communications

- ° Boston Edison will provide complete communications room as part of the EOC area, which will include those radios and antennas

necessary for the operation of the reception center.

Sanitation

- ° Boston Edison will upgrade existing space dedicated to toilet, shower, and dressing areas. An additional eight showers will be provided, floors will be refinished, a dropped ceiling installed with additional lighting fixtures provided, new lockers provided, air conditioning provided, and rearrangement of fixtures will be included in the modernization of this area. Plumbing will be modified to direct shower drains to containment bladders to be installed at the facility. Hallway will be painted, ceiling dropped, and lighting improved.

Decontamination

- ° It was agreed that, subject to confirmation of MDPW, the vehicle decontamination process would be via the "dry wipe method" to minimize adverse environmental impact.

HVAC

- ° Boston Edison will provide air sampling equipment and training to appropriate personnel for operating the equipment. The Executive Office of Public Safety agreed that modifications to the HVAC system are not required for reception center purposes.

The Company shall perform the necessary renovation without cost or expense to MDPW, MCDA or DCPO. Renovation of MDPW Garage shall commence as soon as practical after the execution of this Grant of License by the parties and shall proceed to completion as expeditiously as possible. Work shall be commenced and performed after notification to MDPW in order to ensure that such work does not unduly interfere with the normal operational activities of MDPW. The scheduling of all work under this Grant of License shall be subject to the prior approval of the MDPW. For purposes of such renovation, the Company and its contractors shall be permitted necessary access to MDPW Garage including use of

roads, parking facilities, working areas and layout space, in accordance with the rules and regulations of MDPW and DCPO, and in a manner approved by the MDPW.

MDPW, MCDA, and DCPO agree to provide such assistance as may be necessary in obtaining any licenses, permits, approvals or other government action which shall be required for such renovation to proceed, or for the purposes of this Grant of License to be otherwise carried out. In the event that any such license, permit, approval or governmental action cannot be obtained, or is revoked and is not reinstated despite reasonable efforts of the parties to achieve such reinstatement, all obligations under this Grant of License shall cease except that the Company shall be required to restore MDPW Garage to substantially the condition it was in prior to the commencement of such renovation, unless otherwise agreed to by the parties.

In renovating MDPW Garage, the Company shall comply with all applicable laws, building codes, and with all requirements of the local fire officials. Contractors shall provide copies of all building permits and of insurance certificates relating to liability for accidents, property damage and Workmen's Compensation prior to commencing their work.

The MDPW does not, and shall not be deemed to, represent that the premises with respect to which the within license is granted are suitable for the purposes for which the Company has been granted such license or that they will be made suitable therefor by the renovations agreed to be made pursuant to this paragraph 3; and the Company acknowledges and agrees that the decision to renovate and

use the premises for such purposes was not based on any representation made to it by the MDPW concerning the nature of such premises or their suitability for any purpose or purposes.

All equipment and materials that are installed or modified in, or on the grounds of, MDPW Garage as part of the renovations performed pursuant to this Paragraph 3, shall, upon such installation or modification and the acceptance thereof by MDPW, MCDA, and DCPO become the property of the Commonwealth.

4. Use of MDPW Garage: In the event of a radiological emergency at Pilgrim Station, the MCDA Director for the Massachusetts Civil Defense Agency, acting pursuant to the MCDA Radiological Emergency Response Plan (RERP), shall activate MDPW Garage and the facilities appurtenant thereto (parking lot and related access areas) as a reception center. It is intended that during the period of any radiological emergency, the reception center will be used in accordance with the RERP of MCDA, and such use shall not be deemed to constitute a confiscation of the licensed premises. The functions carried out in the reception center at the time of any such emergency may include registration, monitoring, and decontamination of persons evacuated to the reception center and any emergency operation and activities related thereto. MDPW and MCDA also agree that upon reasonable notice from the Company or the State, the MDPW Garage will be made available for any drill or exercise undertaken as part of the Area II RERP. The Company shall conduct not more than four (4) drills in any calendar year, unless the parties agree otherwise. It is anticipated that each drill will last an average of four (4) hours. The company shall conduct not more than one exercise in any calendar year except

that, if required by federal authorities, a remedial exercise may be conducted. It is anticipated that each exercise will last an average of eight (8) hours.

5. Repair and Maintenance of MDPW Garage: It is understood and agreed that upon completion of the renovation, MDPW Garage shall be in good order and condition. Thereafter, MDPW shall be responsible, at its own expense, for all structural repair and maintenance resulting from the MDPW's normal use of the facility; however, the Company shall be responsible for repairing and maintaining all radiological emergency equipment or materials installed as part of the aforementioned renovation.

6. Utilities: Upon completion of the renovations, the Commonwealth shall be responsible for utilities, including electric, water, sewer and heating. Telephone charges shall be apportioned as follows: The Company will pay telephone line service charges for all phones to be used for radiological emergency response purposes presently installed or to be installed in the future, and all other phone costs incurred during any drill, exercise or actual emergency including long distance charges as necessary. The Commonwealth shall be responsible for telephone line service charges for phones not intended for radiological emergency response purposes, and costs of telephone calls not made during a drill, exercise or actual emergency.

7. Risk of Loss: It is understood and agreed that all personal property belonging to either the Company, MDPW, MCDA, or DCPO which is located on the grounds of MDPW Garage shall be kept strictly at their respective risks and each shall bear its own expenses in the event of loss, except as provided for in Section 8, below.

8. Indemnification: The Company agrees to indemnify and hold harmless the MDPW, MCDA, and DCPO from any and all liability, claims, suits, damages, losses, costs or expenses, for loss or damage to property or injury to persons, including death, and reasonable attorney's fees, caused by, connected with, or arising out of the actions or omissions of such parties in connection with the renovation, restoration or use of the MDPW Garage as a reception center, as the case may be, provided that this covenant shall not apply with respect to any loss, damage or injury caused in whole or in part by the negligence of such parties.

The Company further agrees that, if as a result of a drill, exercise, or radiological emergency at Pilgrim Station, MDPW Garage and facilities appurtenant thereto (parking lot and related access areas) are used as a reception center and are damaged as a result of that use, the Company shall restore, at its expense, MDPW Garage and said facilities to the condition they were in immediately prior to the drill, exercise, or radiological emergency. In the event the MDPW Garage, the facilities appurtenant thereto, or any other property or facilities of MDPW, MCDA, and DCPO shall have been contaminated by radiation as a result of their use pursuant to the license granted hereunder, the Company shall, as a part of such restoration, decontaminate all such property and facilities. The Company will make a good faith effort to commence and to complete such restoration work promptly after the termination of use of the facility as a reception center. The Company, MDPW, MCDA, and DCPO agree that time is of the essence to complete restoration work. All restoration work will be done in accordance with plans and specifications prepared by the Company and approved by MDPW and MCDA and shall

be scheduled so as to avoid to the maximum extent possible interference with MDPW's normal operational activities. All contractors employed by the Company to perform such restoration work shall be subject to the prior approval of the MDPW.

9. Changes in the Terms of This Grant of License: It is understood and agreed that the Company may terminate this Grant of License at any time. However, if the Company terminates this agreement prior to completing the renovation or any restoration of MDPW Garage, the Company shall at its expense, in the case of renovation, restore MDPW Garage to substantially the condition it was in prior to commencement of such renovation or, in the case of restoration, complete such restoration, unless in either case, the parties agree otherwise.

10. Disclaimer of Responsibilities: MDPW, MCDA, and DCPO acknowledge that this obligation of the Company is limited to renovating, restoring or using the MDPW Garage as a reception center in the manner and on the terms set forth in this Grant of License. Nothing in this Grant of License, nor any act of either the company, MDPW, MCDA or DCPO shall be deemed or construed by any of them, or by other persons, (1) to create any relationship of landlord and tenant, third-party beneficiary, principal and agent, limited or general partnership, or joint venture, or of any association or relationship whatsoever involving the Company or (2) except as provided in Sections 1, 2, 3, and 4 above, to create any rights on the part of the State or any third person with respect to the Company or its property.

11. Force Majeure: No party hereto shall be considered in default in the performance of its obligations hereunder to the extent that the performance of any such obligation is prevented or delayed by any cause, existing or future, which is beyond the reasonable control of such party, or is without the fault of negligence of such party, or by a strike or labor dispute the settlement of which shall be within the sole discretion of the party involved, provided that in case of a strike, or labor dispute, the party involved in the strike uses its best efforts to settle said strike or labor dispute in a manner that is in the best interests of each party and the party also gives to the other party prompt notice when it appears that such cause will result in non-performance under this Grant of License. In the event the Company does not undertake or complete said restoration of MDPW Garage at any time required by this Agreement, the Company shall compensate MDPW, and MCDA, and DCPO for all documented expenses incurred by MDPW, MCDA, and DCPO including any legal and other professional fees, in connection with the restoration of MDPW Garage to the condition it was in prior to the commencement of this Agreement; provided, only that nothing in this provision shall be deemed to obligate MDPW, MCDA, or DCPO to remove from MDPW Garage, as a part of any such restoration or otherwise, any materials or

equipment installed or modified in and accepted by MDPW, MCDA, and DCPO as a part of the renovations performed pursuant to paragraph 3 of this Agreement.

12. Duration of Use of the Reception Center: The parties agree that unless otherwise terminated as provided for herein the State and the Company have access to and any use of MDPW Garage, as a reception center in accordance with the provisions of Sections 3, 4 and 5 of this Grant of License, during the period commencing upon the effective date of this Grant of License and continuing up to and through the final decommissioning of Pilgrim Station or twenty-five (25) years whichever is less.

13. Zoning: It is the expectation of the parties that the zoning by-law of the Town of Wellesley will not apply to the renovation, refurbishment or use of the reception center as provided herein. In the event, however, that such restrictions should be asserted by any party to apply to the Company's renovations, the Commonwealth agrees to provide reasonable assistance to the Company in opposing the imposition of such

restrictions or obtaining an exemption therefrom from the Town of Wellesley.

14. Notices: All amendments, notices, requests, objections, waivers, rejections, agreements, approvals, disclosures, and consents of any kind made pursuant to the Grant of License shall be in writing. Any such communication shall be deemed effective for all purposes as of the date such communication is delivered to the office of the addressee by hand or by certified mail return receipt requested, addressed as follows:

(I) For MDPW:
Commissioner
Massachusetts Department of Public Works
10 Park Plaza
Boston, Massachusetts 02116

(II) MCDA
Director
Massachusetts Civil Defense Agency
400 Worcester Road
Framingham, Massachusetts 01701

(III) For DCPO
Commissioner
Massachusetts Division of Capital
Planning and Operations
One Ashburton Place
Boston, MA 02108

(IV) For the Company
Boston Edison Company
Senior Vice President-Nuclear
800 Boylston Street
Boston, Massachusetts 02199

15. Effective Date: This Grant of License shall be deemed to have been accepted, and shall become effective, as of the date this Grant of License is executed and dated by MDPW and MCDA.

16. Entire Agreement: This Grant of License constitutes the entire agreement between the parties hereto and supersedes all prior oral or written agreements between the parties hereto with respect to the renovation and use of MDPW Garage.

IN WITNESS WHEREOF, the undersigned hereunto set their respective hands the day and year first above written.

BOSTON EDISON COMPANY

By: R.G. Bird
R.G. - Bird
Senior Vice President - Nuclear

MASSACHUSETTS CIVIL DEFENSE AGENCY

By: Robert Boulay
Robert Boulay
Director, MCDA

MASSACHUSETTS DIVISION OF CAPITAL
PLANNING AND OPERATIONS

By: John I. Carlson, Jr.
John I. Carlson, Jr.
Deputy Commissioner

MASSACHUSETTS DEPARTMENT OF
PUBLIC WORKS

By: Jane F. Garvey
Jane F. Garvey
Commissioner, MDPW

Item No. Tr-140: "Lack of an emergency operation center [for Wellesley]."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

An Emergency Operations Center (EOC) has been established and equipped at the Wellesley Reception Center and is fully operational. A layout of the Wellesley EOC is contained in Wellesley DPW IP-17 (Draft 2, June 26, 1990), entitled "Reception Center Setup" as an attachment to page 31. Furthermore, based upon MDPW's inability to obtain a generator, Boston Edison has decided to provide a generator to the Wellesley EOC for the sustained capability of the facility. Since most of the communications equipment at the EOC already have backup power capabilities, this generator represents an operational enhancement.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-141: "Inadequacy of sanitation facilities for evacuees [at Wellesley Reception Center]."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

See Response to Item Tr-114.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-142: "[There is a] lack of emergency communications equipment [for Wellesley]."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

All emergency communications equipment documented in the signed LOA governing enhancements to the Wellesley facility has been provided. A layout of the Wellesley EOC which depicts communications areas is attached to page 31 of Wellesley DPW IP-17 (Draft-2, June 26, 1990) "Reception Center Setup". One ham radio has been backordered by Boston Edison and will be delivered and installed at the Wellesley EOC. However, the United States Army is currently receiving all ham radios that are being produced. In any event, the ham radio represents an enhancement and is not essential for operation of the EOC.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-143: "Lack of integrated training of all state agency personnel involved in the [Wellesley reception center] operation."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

Wellesley Reception Center personnel received RERF training prior to the October 1989 exercise. The MCDA is currently meeting with DPW personnel and the Massachusetts National Guard, the individuals who would staff the reception center in the event of an emergency at Pilgrim, to schedule retraining for 1990. This training will be conducted pursuant to the Commonwealth's Comprehensive Training Program which is described in detail in Response to Item Tr-25.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-144: "Lack of workable site specific plan and supporting procedures [for Wellesley Reception Center]."

Source: September 6, 1990, Public Meeting Tr. p. 119

Boston Edison Response:

A draft plan and procedures governing use of the Wellesley Reception Center have been prepared. See Wellesley DPW IP-01 (Draft-2, June 26, 1990) "Reception Center Staff"; IP-05 (Draft-3, June 26, 1990) "Wellesley Reception Center"; IP-10 (Draft-2, June 26, 1990) "American Red Cross"; IP-12 (Draft-2, February 6, 1990) "Animal Control Officer"; IP-16 (Draft-3, June 26, 1990) "Reception Center Medical Support"; IP-17 (Draft-2, June 26, 1990) "Reception Center Setup"; IP-20 (Draft-1, June 26, 1990) "Social Services". These documents are similar to and have been integrated with the other Commonwealth and local community plans and procedures. MCDA's most recent round of revision comments are currently being incorporated into the annual revision of these procedures.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-145: "Lack of sufficient designated host school capacity to shelter school children from EPZ. A draft executive order is attached which empowers use of public facilities for this purpose under an actual emergency. However, no appropriate plans and procedures exist at present."

Source: September 6, 1990, Public Meeting Tr. pp. 119-120

Boston Edison Response:

See Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-146: "Lack of a signed agreement for the transportation staging area [for Wellesley]."

Source: September 6, 1990, Public Meeting Tr. p. 120

Boston Edison Response:

According to MCDA, an LOA exists between MCDA and the Archdiocese of Boston agreeing to the use of the Saint Bartholomew Church for use as the transportation staging area for Wellesley.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-147: "A lack of identifiable public shelters for the beach population."

Source: September 6, 1990, Public Meeting Tr. p. 120

Boston Edison Response:

Comprehensive "Shelter Implementation Programs" far exceeding applicable regulatory requirements were developed for each EPZ town as part of their offsite emergency plans for Pilgrim. These programs ensure that persons on the beaches (and at other major outdoor recreational areas as well) are adequately protected in the event of a fast breaking emergency at Pilgrim. A "Shelter Implementation Program Summary" for each of the local communities in the EPZ was previously forwarded to FEMA along with the draft plans and procedures. The basic elements of the Shelter Implementation Programs are summarized below.

First, under the emergency response program for Pilgrim, both sheltering and evacuation of the beaches and non-beach recreational area will be considered by responsible decision-makers in the event of an emergency. Criteria have been established under which sheltering would only be recommended if it were determined that such action would provide the most effective protective response under the particular circumstances at hand.

Second, it was necessary to identify the population that may require public sheltering in the event of an emergency. In addition to the maximum expected beach population, the Shelter Implementation Programs also address the population at campgrounds, parks and other major outdoor recreational areas in the EPZ. Conservative estimates of the size of the population at these locations were also developed. For the beaches, the expected maximum number of people identified in KLD Associates' October 14, 1987 "Pilgrim EPZ Public Beach Population Analysis" was utilized. For parks, campgrounds and other recreational areas, estimates were obtained from facility administrators and supervisors.

Item No. Tr-147: (cont.)

Third, in order to ensure that adequate sheltering capacity exists, local officials assisted by Boston Edison met with building management in each of the towns to identify available shelter capacity. Individual buildings were determined to be readily accessible before they were designated as public shelters. Structures were selected that were near the beach or recreational area locations. Each was visually inspected to ensure its accessibility and to develop specific floor plans. During these visits, the purpose of the Shelter Program was explained to building management, and they were asked if they would be willing to participate in the program. Once structures were determined to be accessible, suitable and available, Boston Edison entered into LOAs with private building owners to formalize agreements for their use, or obtained municipal authorizations for buildings owned by the local communities.

Moreover, the Shelter Implementation Program Summaries document substantial shelter capacity that is proximate to the beaches and recreational areas and suitable for sheltering.

The Summaries contain a matrix (Summary Attachment 1) which lists, among other things, the following information: (1) beaches and recreational areas in the town and their maximum expected capacity; (2) shelters (whose owners have entered into binding LOAs or municipal authorizations) matched by location to each of these areas; and (3) available and agreed upon shelter capacity. Copies of the signed LOAs and municipal authorizations were included in the Summaries as well.

Another basic element of the Shelter Implementation Programs is that shelters have been equipped with tone alert radios, and procedures have been developed for shelter managers and maintenance personnel that enable them to

Item No. Tr-147: (cont.)

advise shelter users regarding necessary actions. See Town of Plymouth IP-81 (Draft-2, April 27, 1990), entitled "Shelter Manager - Cold Spring School". Advice and direction will be provided by shelter officials at the local EOCs, (see Town of Plymouth IP-10 (Draft-5, July 6, 1990), entitled "Shelter Officer", and through EBS messages. Should subsequent evacuation be required, shelter managers will, therefore, be equipped to facilitate prompt evacuation.

Finally, the Shelter Implementation Programs also address physical accessibility (e.g., proximity to beaches; procedures to ensure the public knows where the shelters are; a program to ensure the facilities are opened to the public). In order to ensure that persons receive prompt and appropriate sheltering instructions, signs have been posted at beach areas providing general sheltering instructions, EBS messages provide appropriate instructions, and route alerting emergency personnel will be assigned to identify specific shelter locations and provide other necessary direction. See Town of Plymouth IP-05 (Draft-5), entitled "Department of Public Works". Additionally, emergency shelter information flyers have been prepared and are available for distribution by recreational route alert teams. These flyers provide information on shelter locations. Of course, the current plans to clear the beaches at the Alert classification will greatly reduce the likelihood of the need for a sheltering directive for the beach population, while facilitating prompt sheltering should such a directive be given.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-148: "Inadequate planning [exists] for the evacuation of the special needs population."

Source: September 6, 1990, Public Meeting Tr. p. 120

Boston Edison Response:

This item restates one of the issues raised in FEMA's August 1987 Self-Initiated Review. In Responses to Items Tr-2, Tr-7, Tr-8 and Tr-12, we have described the program established since 1987 to provide for the evacuation and care of the special needs population.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-149: "[Unresolved FEMA deficiencies include] inadequate planning for the evacuation of the U.S. port-dependent population."

Source: September 6, 1990, Public Meeting Tr. p. 120

Boston Edison Response:

This item restates one of issues raised in FEMA's 1987 Self-Initiated Review. See Response to Item Tr-71.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item N Tr-150: "A lack of evacuation plans for public and private schools and day care centers."

Source: September 6, 1990, Public Meeting Tr. p. 120

Boston Edison Response:

This item restates one of the issues raised in FEMA's August 1987 Self-Initiated Review report and suggests that today there are no plans or procedures for evacuation of schools and day care centers. See Responses to Items Tr-5, Tr-29 and Tr-46 regarding protection of the school and daycare center populations.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-151: "In violation of NUREG 0654, letters of agreement with transportation providers, drivers, federal, state and local agencies and other support organizations having an emergency response role within the EPZ do not exist."

Source: September 6, 1990, Public Meeting Tr. pp. 120-121

Boston Edison Response:

Letters of Agreement (LOAs) have been signed by more than thirty transportation providers, who have agreed to provide numerous buses and other vehicles during an emergency. The original LOAs are on file with MCDA. As discussed in Response to Item Tr-117, the transportation resources of these providers (plus the transportation resources owned directly by impacted facilities) are more than sufficient to transport school and day care populations, mobility-impaired persons, and the transportation-dependent population. There is no requirement that LOAs be entered into by drivers or other persons who collectively supply a labor force or activity. See Response to Item Tr-9. In addition, under NUREG-0654, LOAs are only required between governmental agencies and "support organizations". See, e.g., Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-924, 30 NRC 331, 341 (1989). LOAs have been signed by support organizations. For example, building owners have signed LOAs to provide shelter in the event of an emergency, and LOAs have been signed pertaining to areas such as MS-1 facilities and Congregate Care Centers (CCCs).

Additionally, MCDA intends to enter into LOAs with additional CCCs for Pilgrim and then begin the process of entering into LOAs with CCCs for other nuclear power plants within its jurisdiction. See Memorandum from Julia Gabaldon (MCDA) to Greg O'Ryon (ARC) (May 30, 1990). Finally, there are some LOAs that remain to be signed between MCDA and other organizations. With one

Item No. Tr-151: (cont.)

exception (Conrail, for preventing trains from entering the EPZ during an emergency), the LOAs are not specific to Pilgrim but instead apply to various activities through the Commonwealth (including activities associated with EPZs at other nuclear plants).

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-152: "It is our understanding there is currently no agreement between the Bridgewater State College and the state with regard to a reception center there."

Source: September 6, 1990, Public Meeting Tr. p. 121

Boston Edison Response:

Even though the Bridgewater State College has been designated by the Commonwealth as a reception center for years, the Bridgewater State College, the Commonwealth and Boston Edison have entered into a formal agreement regarding the use of the College as a reception center. Attached is a copy of the signed LOA. The LOA states, among other things, that the College's facilities "shall be utilized as a reception center" in the event of an emergency at Pilgrim.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

GRANT OF LICENSE AND PERMISSION
TO ENTER UPON AND TO USE PROPERTY

On this 6th day of September, 1989 Bridgewater State College ("the College") grants to Boston Edison Company ("the Company"), a Massachusetts electric company with its principal place of business at 800 Boylston Street, Boston, Massachusetts 02199, license and permission to enter upon certain of the College's facilities and properties for the limited purposes described herein:

1. Permission to Enter Upon Premises: The College grants license and permission to the Company, and those authorized by it and approved by the College, to enter upon property owned and controlled by the College. Specifically permission is given to enter a facility known as the Kelly Gymnasium, which is located on the campus of the College in Bridgewater, Massachusetts. The parties agree that this license and grant of permission is revocable at will by the College by giving notice to the Company as provided for in paragraph 12; however, no such notice may be given during a radiological emergency at Pilgrim Station.

2. Purpose of License and Grant of Permission: In the event of a radiological emergency at the Pilgrim Nuclear Power Station ("Pilgrim Station"), which is located in Plymouth, Massachusetts and which is owned and operated by the Company, Kelly Gymnasium shall be utilized as a reception center in accordance with the provisions of the Town of Bridgewater's ("the Town") Radiological Emergency Response Plan. In order to adequately serve as a reception center, it is necessary that certain renovations be made to the Kelly Gymnasium. The purpose of the license and grant of permission is to allow the Company to make the renovations described in paragraph 3 and to permit the use of the Kelly Gymnasium as a reception center as described in paragraph 4.

3. Renovation of Kelly Gymnasium: The Company shall renovate the Kelly Gymnasium so that it is suitable for use as a reception center in the event of a radiological emergency at Pilgrim Station. Such renovation shall include the modification of the existing gymnasium facilities to install an emergency generator, seal the surface shower area and perform additional related work to isolate and collect waste water and shall be completed in accordance with the plans and specifications prepared by the Company and approved by the College. The Company shall perform the necessary renovation without cost or expense to the College. All contractors performing the renovation work shall be subject to the approval of the College. Renovation of Kelly Gymnasium shall commence as soon as practicable after the execution of this Grant of License by the parties and shall proceed to completion as expeditiously as possible. The scheduling of all work under this Grant of License shall be subject to the approval of the College. For purposes of such renovation, the Company and its contractors shall be permitted necessary access to the Kelly Gymnasium including use of roads, parking facilities, working areas and laydown space, in accordance with the College's rules and regulations and in a manner approved by the College.

The College agrees to provide such assistance as may be necessary in obtaining any licenses, permits, approvals or other governmental action which shall be required for such renovation to proceed or for the purposes of this Grant of License to be otherwise carried out. In the event that any such license, permit, approval or governmental action cannot be obtained, or is revoked and is not reinstated despite reasonable efforts of the parties to achieve such reinstatement, all obligations under this Grant of License shall cease except that the Company will be required to restore the Gymnasium to substantially the condition it was in prior to the commencement of such renovation, unless otherwise agreed to by the parties.

In renovating the Kelly Gymnasium the Company shall comply with all applicable laws, building codes, and with all requirements of the local fire officials. Contractors shall provide copies of insurance certificates relating to liability for accidents, property damage and workmens compensation prior to commencing their work.

The College does not, and shall not be deemed to, represent that the premises with respect to which the within license is granted are suitable for the purposes for which the Company has been granted such license or that they will be made suitable therefor by the renovations agreed to be made pursuant to this paragraph 3; and the Company acknowledges and agrees that the decision to renovate and use the premises for such purposes was not based on any representation made to it by the College concerning the nature of such premises or their suitability for any purpose or purposes.

All equipment and materials, including any emergency generator, that are installed or modified in the Kelly Gymnasium as a part of the renovations performed pursuant to this paragraph 3, shall, upon such installation or modification and the acceptance thereof by the College, become the property of the College.

4. Use of Reception Center: In the event of a radiological emergency at Pilgrim Station, the Civil Defense Director for the Town of Bridgewater, acting pursuant to the Town's Radiological Emergency Response Plan, shall request that the College activate Kelly Gymnasium and the facilities appurtenant thereto (parking lot and related access areas) as a reception center. It is intended that during the period of any radiological emergency, the reception center will be used in accordance with the Radiological Emergency Response Plan of the Town of Bridgewater; and such use shall not be deemed to constitute a confiscation of the licensed premises. The functions carried out in the reception center at the time of any such emergency may

include registration, monitoring, decontamination, and family reference services for those persons evacuated to the reception center and any emergency operation and activities related thereto. The College also agrees that upon reasonable notice from the Company or the Town the Kelly Gymnasium will be made available to the Civil Defense Director for the Town for any drill or exercise undertaken as part of the Town's Radiological Emergency Response Plan, however such permission is granted only to the extent use of the Kelly Gymnasium during a drill or exercise will not interfere with the normal educational activities of the College.

5. Repair and Maintenance of Reception Center: It is understood and agreed that upon completion of the renovation Kelly Gymnasium shall be in good order and condition. Thereafter, the College shall be responsible, at its own expense, for all structural repair and maintenance of Kelly Gymnasium resulting from the College's normal use of the facility; however, the Company shall be responsible for repairing and maintaining all radiological emergency equipment or materials installed as part of the aforementioned renovation, including the emergency generator.

6. Risk of Loss: It is understood and agreed that all personal property belonging to either the Company, the Town, or the College, which is located on the campus of the College shall be kept strictly at their respective risks and each shall bear its own expenses in the event of loss, except as provided for in Section 7, below.

7. Indemnification: The Company agrees to indemnify and hold the College harmless from any and all liability, claims, suits, damages, losses, costs or expenses, for loss or damage to property or injury to persons, including death, and reasonable attorney's fees, caused by, connected with, or arising out of the actions or omissions of such party in connection with the renovation, restoration or operation of the Kelly Gymnasium as a reception

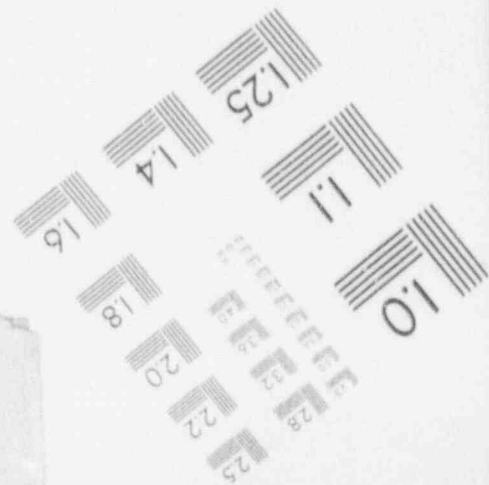
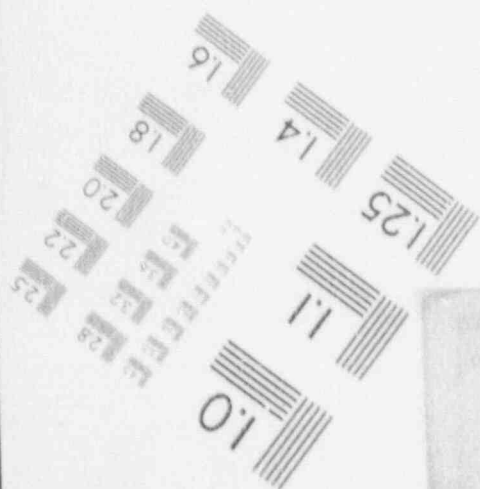
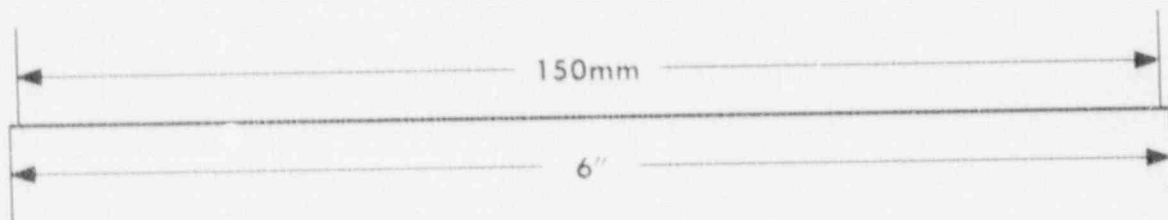
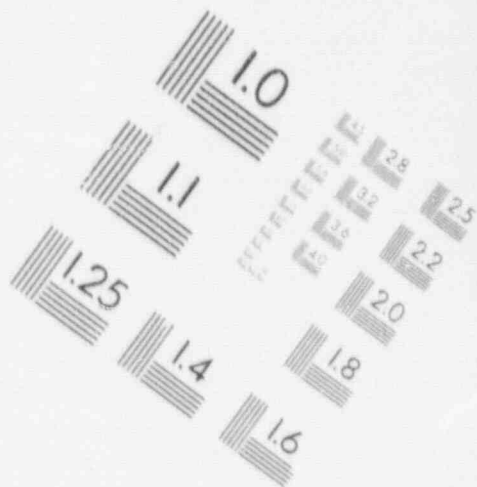
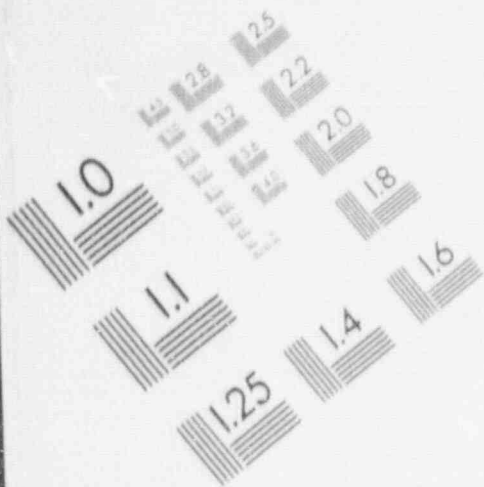
center, as the case may be, provided that this covenant shall not apply with respect to any loss, damage or injury caused in whole or in part by the negligence of the College.

The Company further agrees that, if as a result of a radiological emergency at Pilgrim Station, Kelly Gymnasium and facilities appurtenant thereto (parking lot and related access areas) are used as a reception center and are damaged as a result of that use, the Company shall restore, at its expense, the Kelly Gymnasium and said related facilities to the condition they were in immediately prior to the radiological emergency. In the event that the Kelly Gymnasium, the facilities appurtenant thereto, or any other property or facilities of the College shall have been contaminated by radiation as a result of the use of the Kelly Gymnasium pursuant to the license granted hereunder, the Company shall, as a part of such restoration, decontaminate all such property and facilities. The Company will make a good faith effort to commence and to complete such restoration work promptly after the termination of use of the facility as a reception center. The Company and the College agree that time is of the essence to complete such restoration work. All restoration work will be done in accordance with plans and specifications prepared by the Company and approved by the College and shall be scheduled so as to avoid to the maximum extent possible interference with the College's normal educational activities. All contractors employed by the Company to perform such restoration work shall be subject to the approval of the College.

8. Changes In The Terms of This Grant of License: It is understood and agreed that the Company may terminate this Grant of License at any time. However, if the Company terminates this Agreement prior to completing the renovation or any restoration of Kelly Gymnasium, the Company shall, at its expense, in the case of renovation, restore the Kelly Gymnasium to substantially the condition it was in prior to commencement of such renovation

1

IMAGE EVALUATION TEST TARGET (MT-3)



or, in the case of a restoration, complete such restoration, unless in either case, the parties agree otherwise.

9. Disclaimer of Responsibilities: The College acknowledges that the obligation of the Company is limited to renovating, restoring or operating Kelly Gymnasium as a reception center in the manner and on the terms set forth in this Grant of License. Nothing in this Grant of License, nor any act of either the Company or the College, shall be deemed or construed by either of them, or by third persons, (1) to create any relationship of landlord and tenant, third-party beneficiary, principal and agent, limited or general partnership, or joint venture, or of any association or relationship whatsoever involving the Company or (2) except as provided in Sections 1, 2, 3, and 4 above, to create any rights on the part of the Town or any third person with respect to the Company or its property.

10. Force Majeure: No party hereto shall be considered in default in the performance of its obligations hereunder to the extent that the performance of any such obligation is prevented or delayed by any cause, existing or future, which is beyond the reasonable control of such party, or is without the fault or negligence of such party, or by a strike or labor dispute the settlement of which shall be within the sole discretion of the party involved, provided that in case of a strike, or labor dispute, the party involved in the strike uses its best efforts to settle said strike or labor dispute in a manner that is in the best interests of each party and the party also gives to the other party prompt notice when it appears that such cause will result in non-performance under this Grant of License. In the event the Company does not undertake or complete said restoration or any restoration of the Kelly Gymnasium at any time required by this Agreement, the Company shall compensate the College for all expenses incurred by the College, including any legal and other professional fees, in connection with the restoration of the Kelly Gymnasium

to the condition it was in prior to the commencement of this Agreement; provided, only that nothing in this provision shall be deemed to obligate the College to remove from the Kelly Gymnasium, as a part of any such restoration or otherwise, any materials or equipment installed or modified in the Kelly Gymnasium and accepted by the College as a part of the renovations performed pursuant to paragraph 3 of this Agreement.

11. Duration of Use of Kelly Gymnasium Reception Center: The parties agree that unless otherwise terminated as provided for herein the Town and the Company have access to and any use the Kelly Gymnasium, as a reception center in accordance with the provisions of sections 3, 4 and 5 of this Grant of License, during the period commencing upon the effective date of this Grant of License and continuing up to and through the final decommissioning of Pilgrim Station or twenty-five (25) years whichever is less.

12. Notices: All amendments, notices, requests, objections, waivers, rejections, agreements, approvals, disclosures and consents of any kind made pursuant to this Grant of License shall be in writing. Any such communication shall be deemed effective for all purposes as of the date such communication is delivered to the office of the addressee by hand or by certified mail return receipt requested, addressed as follows:

(i) For the College

Board of Trustees
Bridgewater State College
Bridgewater, Massachusetts 02324

(ii) For the Company

Boston Edison Company
Senior Vice President-Nuclear
800 Boylston Street
Boston, Massachusetts 02199

13. Effective Date: This Grant of License shall be deemed to have been accepted, and shall become effective, as of the date this Grant of License is executed and dated by the College.

14. Entire Agreement: This Grant of License constitutes the entire agreement between the parties hereto and supersedes all prior oral or written agreements between the parties hereto with respect to the renovation and use of the Kelly Gymnasium.

IN WITNESS WHEREOF, the undersigned hereunto set their respective hands the day and year first above written.

BOSTON EDISON COMPANY

BOARD OF TRUSTEES
BRIDGEWATER STATE COLLEGE

By R.G. Bird
R.G. Bird

By Paul B. Fenn

Its Senior Vice President-Nuclear

Its: Chairperson

APPROVED BY:

APPROVED BY:

Commonwealth of Massachusetts
Division of Capital Planning
& Operations

Massachusetts Civil Defense Agency
Office of Emergency Preparedness

By John L. Carlson
Its Deputy Commissioner

By Robert D. Day
Its Director

Date: 8/30/89

Date: July 20, 1989

Item No. Tr-153: "The proposed use of a Governor's executive order to commandeer public facilities in the event of an emergency does not satisfy the requirements of Federal regulations because the facilities have not been identified and therefore cannot be tested."

Source: September 6, 1990, Public Meeting Tr. p. 121

Boston Edison Response:

The May 1990 remedial exercise included in the extent of play a description of what must be demonstrated in relation to the Executive Order. As described in the attached June 5, 1990 letter from Richard Strome (FEMA Regional Director) to Charles Barry (Massachusetts Secretary of Public Health and Safety), "The Commonwealth adequately demonstrated the ability [in the remedial exercise] to provide accurate and timely information, using the Emergency Broadcast System, to the citizens of the Emergency Planning Zone towns, including Duxbury and Marshfield, about the host schools to which their students would evacuate in the event of an emergency." Additionally, FEMA noted in its August 31, 1990 Final Exercise Assessment at Table 3 on page 106 that deficiency number 2 was adequately demonstrated. However, one ARCA was identified. As recognized by FEMA, the Commonwealth's ability to implement the Executive Order was demonstrated in the May 1990 remedial exercise and therefore, satisfies FEMA's requirements. In addition, see Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable



Federal Emergency Management Agency Tr-153

Region I J.W. McCormack Post Office and Court House

Boston, Massachusetts 02109

June 5, 1990

R-

Copy - Bob B - C.D.

Bob - Thank you!
[Signature]

Charles V. Barry, Secretary
Executive Office of Public Safety
One Ashburton Place
Boston, Massachusetts 02108

Dear Secretary Barry:

On Friday, May 25, 1990, FEMA conducted a remedial exercise to evaluate those objectives found to be deficient during the October 12 and 13, 1989, Pilgrim Nuclear Power Station exercise. We are pleased to report that objectives 3 and 13 were adequately demonstrated and that the deficiencies were corrected. The results of the evaluation are in the process of being written and will be included in the Final Exercise Report.

The draft changes made to the plans and implementing procedures, particularly as they relate to the ability to direct, coordinate, and control emergency activities, have greatly improved the Commonwealth's ability, as demonstrated in the remedial exercise, to respond rapidly to emergency situations. Boston Edison Company and the Massachusetts Civil Defense Agency have worked cooperatively to provide equipment enhancements and procedural changes which have proved effective.

The Commonwealth adequately demonstrated the ability to provide accurate and timely information, using the Emergency Broadcast System, to the citizens of the Emergency Planning Zone towns, including Duxbury and Marshfield, about the host schools to which their students would evacuate in the event of an emergency.

The preparation for and the execution of the remedial exercise by Bob Boulay and the Massachusetts Civil Defense Agency staff was professional and complete. We feel certain that once these changes are permanently incorporated into the Pilgrim Nuclear Power Station Plans and Procedures, the Massachusetts Civil Defense Agency will have greatly enhanced its capability to respond to radiological incidents at this site.

Please convey to Bob Boulay our sincere and heartfelt appreciation for the exemplary leadership he provided in the conduct of this exercise.

Sincerely,

[Signature]

Richard H. Strome
Regional Director

Item No. Tr-154: "[T]he Inspector General's report demonstrates that the Boston Edison personnel provided inaccurate information to NRC staff in violation of 10 CFR 50.9. The facts demonstrating a violation of 50.9 appear on pages 3 through 4 of the report. At page 3, the report states, 'The NRC staff learned from BECO that all emergency implementing procedures for the EPZ communities had been submitted to the state for technical review with the exception of five procedures for the towns of Plymouth and Duxbury. The inaccuracy of this information is confirmed at page 4.'

Source: September 6, 1990, Public Meeting Tr. p. 127

Boston Edison Response:

Boston Edison did not misinform the NRC Staff regarding the status of the EPZ community implementing procedures. In particular, we did not state that all implementing procedures for the EPZ communities had been submitted to the Commonwealth with the exception of five Plymouth and Duxbury procedures. Attached are the relevant excerpts from Boston Edison communications to the NRC Staff prior to the Commission meetings discussed in the OIG Report. Those excerpts clearly demonstrate that Boston Edison accurately portrayed the status of the procedures to the NRC Staff.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Tr-154



BOSTON EDISON
Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Boston Edison Company
DPU 88-28
Exhibit No. BE-103
Sponsor: RAV

Ralph G. Bird
Senior Vice President — Nuclear

October 4, 1988
BECO Letter #88-141

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

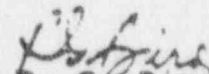
Docket No: 50-293
License No: DPR-35

Subject: Boston Edison Company Report on the Status of
Offsite Emergency Preparedness Around Pilgrim
Nuclear Power Station

Dear Sir:

Enclosed is Boston Edison's response to the NRC's letter of September 26, 1988 entitled "Offsite Emergency Preparedness - Pilgrim Nuclear Power Station (PNPS)". This written description reflects Boston Edison's understanding of Pilgrim offsite emergency plans, implementing procedures, training, and the status of the six issues identified by the Federal Emergency Management Agency in August 1987.

Please contact either Ron Varley, Manager of Emergency Preparedness or myself with any questions or comments.


R. G. Bird

/Attachment

October 4, 1988
BECO Ltr. #88-141
Page 2

Docket No.: 50-293
License No.: DPR-35

cc: Mr. William T. Russell
Regional Administrator
U.S. Nuclear Regulatory Commission - Region I
475 Allendale Road
King of Prussia, PA 19406

Mr. D. G. McDonald
Project Manager
Division of Reactor Projects I/II
U.S. Nuclear Regulatory Commission
Mail Stop #14D1
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Senior NRC Resident Inspector
Pilgrim Nuclear Power Station

BOSTON EDISON COMPANY REPORT
ON THE STATUS OF OFFSITE
EMERGENCY PREPAREDNESS AROUND
PILGRIM NUCLEAR POWER STATION

Nuclear Reactor Regulation
Staff Meeting

October 5, 1988

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I. INTRODUCTION

By letter dated September 26, 1988, the Nuclear Regulatory Commission (NRC) Staff requested that Boston Edison Company provide a written report describing our current state of knowledge concerning the status of: (1) the offsite emergency preparedness program around Pilgrim Nuclear Power Station (Pilgrim); and (2) the issues identified by the Federal Emergency Management Agency (FEMA) in its August, 1987 "Self-Initiated Review" (SIR). A copy of the Staff's letter is included as Attachment A to this report.

The purpose of this document is to provide the written report requested by the Staff. Section II provides an overview of the efforts made to enhance the offsite emergency response program to date. Section III addresses the actions taken to address the specific "SIR" issues. Section IV provides a brief conclusion.

An extensive effort has been underway to upgrade the offsite emergency response program around Pilgrim Station. That effort has involved all of the parties responsible for the offsite program for Pilgrim. Those parties include the Commonwealth of Massachusetts, the five towns in the Pilgrim plume exposure pathway emergency planning zone (EPZ) (the Towns of Plymouth, Kingston, Carver, Marshfield and Duxbury), and the two reception center communities of Taunton and Bridgewater. Though offsite emergency response is primarily the responsibility

of the Commonwealth and the local governments, Boston Edison Company has provided extensive assistance in the emergency planning effort.

As discussed in more detail below, a great deal of progress has been made in upgrading the state of offsite emergency preparedness around Pilgrim Station. This progress has been explicitly recognized by FEMA. In letters dated March 30, 1988 to Governor Dukakis and Mr. Robert Boulay (Director of the Massachusetts Civil Defense Agency and Office of Emergency Preparedness) (MCDA), FEMA stated that "some outstanding improvements are now underway in the PNPS emergency plans" and that "[i]t is gratifying ... to observe the progress ... made in the past year toward achieving an off-site plan that will provide reasonable assurance that the public health and safety will be protected"

We believe that the significant progress achieved to date is due, in some measure, to our recognition that the offsite emergency response program "belongs" to the Commonwealth and the towns, and that our legitimate role is to provide assistance in improving and maintaining their offsite program. Accordingly, it is important to stress that the views presented in this report are those of Boston Edison, and that we are not speaking on behalf of either the Commonwealth or the towns.

Boston Edison recognizes that the effort to improve the Commonwealth and local government emergency response program is not complete. We are, however, committed to providing continued assistance to further enhance and maintain the offsite program.

Commonwealth and Boston Edison planners. The Area II plan draft was recently forwarded to FEMA for informal technical review as well.

In addition to the plans themselves, hundreds of detailed draft implementing procedures for responsible officials and emergency workers in all seven towns and MCDA Area II have been prepared in close cooperation with local officials and agency heads. Drafts of facility specific procedures have been prepared for each school, licensed daycare center, nursing home or other special facility in the EPZ.

The implementing procedures contain detailed checklists of actions to be taken by responsible persons under each of the possible emergency classifications. The checklists carefully prioritize and specify individual responsibilities. Complete procedure packages for the Towns of Marshfield and Bridgewater, and the City of Taunton have been forwarded to the Commonwealth with requests to transmit the documents to FEMA for informal technical review. 4/ The Marshfield and Taunton packages were recently forwarded by the Commonwealth to FEMA.

Along with the procedures, tables of cross-references, identifying the specific portions of the draft plans and the specific steps in the implementing procedures which address each

4/ Letter, Robert C. Spearin to Robert J. Boulay (August 15, 1988); Letter, Frank Maher to Robert J. Boulay (September 21, 1988); Letter, Daniel McGonagle to Robert J. Boulay (August 12, 1988).

of the criticisms in FEMA's SIR, have also been forwarded to the Commonwealth. 5/ The status of the SIR issues is discussed separately in section III of this report.

Development of the implementing procedures represents a significant accomplishment. They provide detailed, structured guidance which is integrated with the Commonwealth's response program. The new procedures will greatly assist the towns in performing effectively in the event of an emergency.

An entirely new training program is another important element of the effort to upgrade the Pilgrim offsite emergency preparedness program. On November 20, 1987, MCDA approved an overall training plan, which outlined the basic elements of the new training program. Since that time, over 100 training modules comprised of over 500 specific lesson plans have been prepared by the professional planners employed by Boston Edison. These training materials are designed to assist emergency response personnel in better understanding the specific tasks and responsibilities set forth in the detailed implementing procedures.

5/ Similar cross-reference tables have been, or are being prepared, in the other towns. The tables cross-reference the plans and procedures to the SIR "subissues" identified in Boston Edison's September 17, 1987 "Action Plan and Schedule for Providing Assistance in Addressing FEMA Issues" (Action Plan). Since one of those subissues (Subissue F.2) cited unresolved issues from previous RAC and exercise reviews, Part II of the cross-reference tables shows how each of those unresolved issues has been addressed in the planning process.

III. ACTIONS TAKEN TO ADDRESS THE SIR ISSUES

FEMA's August, 1987 SIR identified "six areas of major concern." 6/ Boston Edison's September 17, 1987 "Action Plan" took each of those areas and identified a number of "subissues" which collectively comprise the six areas. The following section quotes each of the subissues as designated in the Action Plan and describes the actions taken to address each of those subissues.

Before doing so, however, it should be noted that, as mentioned earlier, the Towns of Marshfield and Bridgewater, and the City of Taunton have transmitted to the Commonwealth tables which cross-referenced their draft plans and procedures with the specific SIR issues, and similar tables are being prepared in the other towns. In particular, the cross-reference tables identify each SIR subissue, list the specific portions of the plans and procedures which address that subissue, and provide a brief summary of the cited plan and procedure provisions. The purpose of the cross-reference tables is to show how the FEMA concerns are being specifically addressed in the detailed implementing documents for the offsite program.

A. SIR Issue A. Evacuation of Schools

Subissue A.1 (SIR, p. 15)

"The 1985 version of the town plans for Plymouth, Duxbury, Carver, Kingston, and Marshfield are inadequate in that they do not identify all private schools and daycare centers within the plume exposure emergency planning zone."

6/ SIR, p. 10.

The draft plans for each of the five EPZ towns now contain lists which identify the public schools, private schools and licensed daycare centers in the EPZ. 7/ These listings are also contained in the relevant draft procedures (typically in the School Superintendents' checklists) so that they will be readily available to the persons principally responsible for ensuring that appropriate protective actions are taken for the school and daycare facility populations. The school and daycare listings have been reviewed for accuracy by local civil defense officials, and the daycare listings have also been verified against information provided by the Commonwealth of Massachusetts Office for Children.

The plans and procedures developed to ensure that children and staff in these institutions are protected are discussed under Subissues A.2 and A.3 below. Letters of Agreement are discussed under Subissue A.4 and training is discussed under Subissue A.5.

Subissue A.2 (SIR, p. 15)

"Detailed plans and procedures must be developed for these institutions, identifying sufficient resources and arranging for the availability of these resources to evacuate children and staff in the event of an accident at Pilgrim."

7/ Registered, as opposed to licensed, daycare centers are not listed. Registered centers may not accept more than 6 children and are treated in the plans as part of the general population.

Draft plans and procedures have been developed for public and private schools and daycare centers to ensure that children and staff can be efficiently evacuated in the event of an emergency at Pilgrim. The draft plans contain provisions for: (1) notification of school principals and daycare center administrators of the emergency and of protective action recommendations; and (2) notification of school and daycare center staffs. At the "ALERT" classification level, buses will be dispatched to EPZ schools and daycare centers in preparation for a precautionary transfer of children to their designated host schools. An adequate number of buses will be provided to transport the children out of the EPZ in a single trip. 8/

Specific implementing procedures provide detailed direction and guidance to responsible emergency response personnel in carrying out the plans. Draft procedures developed for EOC transportation officials, school and day care center officials and staff, and transportation providers contain detailed checklists of actions to be taken under different scenarios. Facility-specific procedures have also been developed for each school and licensed daycare center.

In particular, draft procedures have been established for town officials (such as the local police department or Civil Defense Director) to notify school Superintendents of the emergency classification and protective action recommendations.

8/ A more detailed discussion of the adequacy of bus resources to achieve this objective is provided under Subissue A.4.

The procedures established for school Superintendents provide, among other things, for: (1) notification of specific schools and daycare centers of the emergency classification and protective action recommendations; (2) obtaining transportation resource needs from each of the schools and daycare centers; (3) notification of the EOC transportation officer to prestage vehicles at assigned schools and daycare centers; and (4) instruction to schools and daycare centers to transfer children to host schools or to implement evacuation or sheltering. The Superintendents' procedures include "School Status Sheets" which identify each school or daycare center, primary and secondary contacts at those locations, size of enrollment and staff, and maximum number (and types) of transportation resources needed for each. Separate detailed draft procedures have been developed for Superintendents' staff to assist the Superintendents in carrying out their functions.

Separate draft facility-specific procedures for school principals specify, among other things, the actions to be taken to: (1) notify school staff of the emergency and protective action recommendations; (2) provide the Superintendent with the number and types of vehicles needed; (3) coordinate sign out of students picked up by parents; (4) assist in relocation, evacuation or sheltering of students; and (5) ensure accountability of children. "Transportation Needs Worksheets" for each school are provided to assist in determining specific transportation needs.

Individual draft procedures for each daycare facility have also been established which describe actions to be taken by the facility administrator similar to those established for school principals and for other facility personnel.

"Transportation Needs Worksheets" are provided, as with schools, to assist in determining specific needs.

Draft procedures for teachers provide checklists for: (1) ensuring accountability of students; (2) assisting in transporting students; (3) supervising students during relocation, evacuation or sheltering; and (4) releasing students to parents. Procedures have also been prepared for school nurses/health aides and school maintenance staff to assist, as appropriate, in the relocation, evacuation or sheltering process.

In addition to the school department and daycare facility procedures, specific draft procedures designate the responsibilities of: (1) local and/or school transportation officers (located at EOCs), and the MCDA Area II transportation officer, who respond to requests for supplemental vehicles from the Superintendent or other responsible official; and (2) supplemental vehicle providers (who dispatch vehicles). The "sufficiency" of the resources available is discussed under Subissue A.4 below.

In short, the process of notification, vehicle dispatch, and implementation of precautionary transfer or evacuation of children and staff at public and private schools and licensed daycare centers in the EPZ has been fully proceduralized and incorporated into the Pilgrim offsite planning program.

While not relevant to Subissue A.2, it should be noted that sheltering of the school and daycare center populations has also been proceduralized, and incorporated into the offsite program as an available option for protecting this segment of the public.

Subissue A.3 (SIR, p. 15)

"The Commonwealth's current position is that it will not use the vast state controlled bus resources of the MBTA and that it can no longer rely on ad hoc planning, at least during a fast breaking accident. Detailed plans and procedures must, therefore, be developed for the early dismissal and evacuation of each community's schools and daycare centers."

SIR Subissue A.3 first stated that the Commonwealth does not intend to use Metropolitan Boston Transit Authority (MBTA) resources in the event of an emergency at Pilgrim. However, in Commonwealth Secretary of Public Safety, Charles V. Barry's December 16, 1987 "Report on Emergency Preparedness for An Accident at Pilgrim Nuclear Power Station" (p. 13), the Commonwealth stated:

At least one finding of the Self-Initiated Review is based upon a misimpression by FEMA. In evaluating resources available for transport dependent people, FEMA contended that the Commonwealth would not use MBTA buses if they

are needed to assist an evacuation in the Pilgrim EPZ. In fact, the Commonwealth will endeavor to make these buses and all other public resources available to assist in emergency response if they are needed to supplement resources available in the more immediate vicinity of Pilgrim.

In a March 30, 1988 letter from FEMA to Governor Dukakis, ^{9/} FEMA stated that in order for the "plans [to utilize MBTA resources] to be acceptable, the specific resources and plans for their anticipated use would have to be detailed."

While it was useful for the Commonwealth to clarify the availability of MBTA vehicles as a backup resource, the current planning program does not rely on the availability of these resources. On the contrary, more than adequate resources exist, and are available, in the more immediate vicinity of Pilgrim Station. The sufficiency of such resources is discussed under Subissue A.4.

Subissue A.3 also stated that detailed plans and procedures must be developed for early dismissal and evacuation of schools and daycare centers. As discussed under Subissue A.2 above, draft plans and procedures have now been established for precautionary transfer of students and children at daycare facilities prior to any evacuation recommendation for the general public. Accordingly, detailed draft plans and procedures have been established to provide for the early transfer of students and children at daycare centers before any protective action recommendation for the general public.

^{9/} Letter, Henry G. Vickers to Honorable Michael S. Dukakis (March 30, 1988).

UNITED STATES NUCLEAR REGULATORY COMMISSION

In the Matter of:

OPEN MEETING WITH BOSTON EDISON
COMPANY: PILGRIM NUCLEAR POWER
STATION

)
) Docket No. 50-293
)

Pages: 1 through 93

Place: Rockville, Maryland

Date: October 5, 1988

HERITAGE REPORTING CORPORATION

Official Reporters
1130 L Street, N.W., Suite 600
Washington, D.C. 20005
(202) 638-0700

1 with local and Commonwealth officials. Boston Edison has
2 spent about \$10 million in its assistance efforts since
3 August of 1987 and expects to spend an additional \$5 million
4 in 1988.

5 Drafts of revised emergency response plans for all
6 seven towns and for MCDA area 2 have been prepared. Local
7 civil defense directors and other responsible town officials
8 have been intimately involved in their preparation. As of
9 last evening, five of the seven towns have forwarded revised
10 draft emergency plans, full sets of draft, detailed
11 implementing procedures, and draft shelter implementation
12 programs to the Commonwealth for their review and for
13 forwarding to FEMA for a second round of informal technical
14 reviews. Late last month the Commonwealth also submitted a
15 draft of their area 2 plane for FEMA informal technical
16 review as well.

17 FEMA's first round of informal reviews resulted in
18 requests for various corrections and additional information
19 to be provided on the town's draft plans and looked to the
20 submission of implementing procedures as well. They also
21 indicated in their first review that they believed that some
22 outstanding improvements were being made in the program.
23 FEMA's specific comments have been incorporated into the new
24 revisions of the towns' draft plans that are being
25 submitted.

1 In addition to the plans themselves, hundreds of
2 detailed draft implementing procedures for responsible
3 officials and emergency workers have been prepared.
4 Facility-specific draft procedures have been developed for
5 each school, licensed day-care center, nursing home, or
6 other special facility in the EPZ.

7 The draft implementing procedures contain detailed
8 checklists of actions to be taken by the responsible persons
9 under each of the possible emergency classifications. The
10 checklists contain, in the procedures, carefully prioritized
11 actions and specify individual responsibilities.
12 Development of the draft implementing procedures in our
13 opinion represents a significant accomplishment. They
14 provide detailed, structured guidance, and are integrated
15 with the Commonwealth's response program. These new
16 procedures will greatly assist the towns in performing
17 effectively in the event of an emergency.

18 An entirely new training program is another
19 important element of the efforts to upgrade the off-site
20 emergency preparedness program. Over 500 specific lesson
21 plans have been prepared. These training materials are
22 designed to assist emergency response personnel in better
23 understanding the specific tasks and the responsibilities
24 set forth in the detailed implementing procedures.

25 Almost all of the lesson plans have been prepared,

BOSTON EDISON
Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

Ralph G. Bird
Senior Vice President — Nuclear

October 7, 1988
BECO Ltr. #88-143

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

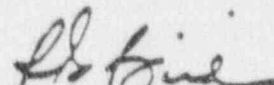
Docket No.: 50-293
License No.: DPR-35

Re: Boston Edison Company Comments on Draft
of "A Report on Progress Made in Emergency
Planning for Response to an Accident at
Pilgrim Nuclear Power Station"

Dear Sir:

The enclosed letter was transmitted today to Mr. Agnes of the Commonwealth of Massachusetts Executive Office of Public Safety. It provides Boston Edison's comments on the draft report entitled "A Report on Progress Made in Emergency Planning for Response to an Accident at Pilgrim Nuclear Power Station." This transmittal is for your information.

Please contact Mr. Ron Varley, Manager of Emergency Preparedness, with any questions.


R. G. Bird

:caw

Enclosure

B. Carver (Draft Report pp. 51-53)

37. The EPZ Town of Carver has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP has discussed the results of these reviews with Carver officials. However, Carver has submitted neither implementing procedures nor a shelter utilization plan for review. (pp. 51-52)

COMMENTS: On October 4, 1988 the Town of Carver Board of Selectmen authorized the submission of their draft procedures and shelter implementation program description to FEMA for informal technical review. The Town of Kingston Board of Selectmen took similar action on October 4. Five of the seven towns have authorized submission of their draft procedures and other planning documents for review.

C. Duxbury (Draft Report pp. 53-55)

39. The EPZ Town of Duxbury has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Duxbury officials. However, Duxbury has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 53)

COM: : In Duxbury, 38 of 40 draft procedures have received concurrence from the responsible individuals. Many must still be reviewed by the town RERP Committee. All of the municipal authorizations for shelters in Duxbury have been signed.

D. Kingston (Draft Report pp. 55-56)

42. The EPZ Town of Kingston has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Kingston officials. However, Kingston has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 55)

COMMENTS: On October 4, 1988 the Kingston Board of Selectmen authorized submission of their draft procedures and Shelter Implementation Program description to FEMA for informal technical review.

F. Plymouth (Draft Report pp. 59-61)

48. The EPZ Town of Plymouth has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Plymouth officials. However, Plymouth has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 59)

COMMENTS: While the draft Plymouth procedures and Shelter Implementation Program description have not yet been submitted for informal review, it should be noted that 87 of 90 draft procedures have received concurrence by responsible agency heads or facility administrators, and most of the shelter LOA's and municipal authorizations have been obtained.

Item No. Tr-155: "Cape Cod, the beautiful peninsula just south of here, is an identified risk area with no specific planning for the dangerously unique conditions involved in a radiological accident. With only two access roads, we have no where to go if a radioactive plume goes south."

Source: September 6, 1990, Public Meeting Tr. p. 130

Boston Edison Response:

Cape Cod is not within the plume EPZ of Pilgrim. The nearest portion of Cape Cod is twelve miles from Pilgrim and extends to beyond forty miles. It is within the fifty-mile ingestion planning zone, and as such, is covered by the Massachusetts Ingestion Pathway Plan (July 1987 with updates).

Further, the Pilgrim Evacuation Time Estimate Study considers traffic from Cape Cod to the extent that it may impact evacuation of the ten-mile emergency plannir In that context, traffic control points and flow patterns are establish. . . that divert Cape Cod traffic away from the plume EPZ onto major regional highway systems. See ETE Rev. 1 (July 15, 1989) Vol. 1, p. 8-3, and Vol. 2, Appendix I.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-156: "[O]ver-the-counter sales of potassium iodide should be made available 'particularly to residents of Cape Cod who may need days to evacuate.' Well, there's no evacuation plans on Cape Cod."

Source: September 6, 1990, Public Meeting Tr. p. 130

Boston Edison Response:

See Responses to Items Tr-43 and Tr-155.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-157: "[I]t was pointed out that FEMA mentioned they had a communications problem in Duxbury with the host schools. It took someone here to point out the problem was we didn't have a host school."

Source: September 6, 1990, Public Meeting Tr. p. 132

Boston Edison Response:

See Responses to Items Tr-5 and Tr-153.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Tr-158: "There are discrepancies with MCDA that can give high 500 numbers for the number of busses that will be available, but again it takes members of emergency response committees to point out that they have no drivers or they are only available at a certain percent after midnight."

Source: September 6, 1990, Public Meeting Tr. p. 132

Boston Edison Response:

Response to Item Tr-117 identifies the number of transportation resources that have been assigned for evacuation of individuals during an emergency. LOAs with transportation providers identify the number of vehicles and drivers that are estimated to be available during on and off hours. The numbers identified in Response to Item Tr-117 do not account for vehicles for which there are no drivers, for which there are no vehicles, or that are not available during the hours of the day or times of the year in which they are needed.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-159: "[T]he Governor's state of emergency is still key to implementing the plan and it's an ad hoc process that still isn't in place and it's sort of everything is riding on that and that hasn't been finished either."

Source: September 6, 1990, Public Meeting Tr. p. 135

Boston Edison Response:

In the event of an accident at Pilgrim, the Governor of Massachusetts has the authority pursuant to Chapter 33, Appendix, Section 13-5 of the General Laws of Massachusetts to declare a state of emergency, and may then direct Commonwealth and local agencies to take appropriate action. Upon declaration of a state of emergency by the Governor, Section 2A of Chapter 17 of the General Laws of Massachusetts authorizes the Commissioner of Public Health and Safety to take such actions necessary to "ensure maintenance of public health and prevention of disease". The Secretary of Public Safety acts through the MCDA Director, as the Governor's coordinator, as set forth in the State's Comprehensive Emergency Response Plan and detailed in the hazard-specific supplement to that plan for emergency response to nuclear incidents. The provisions are contained directly in the Commonwealth's plan and were demonstrated during the October 1989 exercise.

The Massachusetts RERP states that the "General Laws of Massachusetts, Chapter 639, Acts of 1950, as amended and codified in Chapter 33 appendix, Section 13-2B, authorizes the Director of the [MCDA] to make plans for response to potential effects of accidents at nuclear power stations".

The MCDA Director is responsible for requesting a Governor's Declaration of Emergency at the Alert level, as needed, or at the Site Area Emergency classification level. See MCDA IP-01 (Draft-6, July 9, 1990), entitled "MCDA Director".

Item No. Tr-159: (cont.)

Therefore, the Governor's Declaration of a State of Emergency is adequately provided for in the Commonwealth's plan and has been demonstrated in emergency exercises.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-160: "[N]obody has mentioned that there is no way out. And if that plant were running right now and it melted down, you would not be able to get out either because you'd have to go down Route 44. And at 2:00 on a Tuesday afternoon, you can't get down Route 44. You can't get down Route 3 on a Friday afternoon. The fact is there's a whole lot o' denial going on with these evacuation plans because there is no way out. It's that simple."

Source: September 6, 1990, Public Meeting Tr. p. 147

Boston Edison Response:

In 1988 KLD Associates completed an updated Evacuation Time Estimate ("ETE") for the Pilgrim Emergency Planning Zone ("EPZ"). In addition, the 1988 ETE was revised in 1989 and is undergoing revision for 1990 in order to provide information for use in updating emergency plans and procedures. The Pilgrim ETE and its updates reflect an analysis of the existing EPZ road network and traffic flows on those roads. Both FEMA and the NRC have reviewed and commented on the ETE. Additionally, the 1989 ETE was updated to reflect comments received from State and local agencies, town RERP communities, and the general public. The ETE concluded that the entire EPZ could be evacuated, depending upon the various scenario, in four to seven hours.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-161: "[W]e have two written statements that were received. The first one to be added to the record will be a statement from Richard Katzenstein from Hingham, Massachusetts, and the second is from Margaret Saunders from Duxbury, Massachusetts."

Source: September 6, 1990, Public Meeting Tr. p. 149

Boston Edison Response:

No response required.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

III. RESPONSES TO PUBLIC MEETING TRANSCRIPT ATTACHMENT ITEMS

Item No. Tr-A5-1:

"[T]hat a dedicated communications system [should] be developed [for Needham]..."

Source: Transcript Attachment 5. Letter from Donald G. Kennedy (Duxbury, Superintendent of Schools) to Frederick J. Tirrell (Needham, Superintendent of Schools) re: summary of meeting concerning possibility of Needham to be host school.

Boston Edison Response:

The planned communications needs for Needham cannot be finalized until the Host School procedures have been reviewed and accepted by Needham officials. As discussed in Response to Item Tr-5, current planning does not rely on Needham but instead utilizes the Governor's Executive Order powers. It is fair to assume the communications system will be consistent with the communications capabilities of the other two reception communities. In this case, commercial telephones will serve as the primary means of communication with RACES radio as a backup. A RACES radio has been installed at the Wellesley EOC and volunteers with their own equipment would be assigned to Needham Schools to establish this backup system. See Wellesley DPW IP-09 (Draft-2, June 26, 1990), entitled "Communications Officer" p. 1.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-1:

"4. 8:50 - According to the written scenario, Governor Dukakis was to declare a state of emergency at this time and to order a precautionary evacuation of Duxbury Beach, the Gurney [sic], Saquish, and Clark's Island. However, according to the Massachusetts Department of Public Health, it is unlikely that a state of emergency will be declared at an alert stage. The scenario, thus, is unrealistic in this regard."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

This item states that it is unlikely that a State of Emergency would be declared at an Alert. Section 5.2.5 of the Commonwealth RERP, Appendix 2 to Hazard Specific Supplement No. 6 (September 1990) states that at an Alert, MCDA/OEP and MDPH shall consider advising the Governor to declare a State of Emergency.

Regardless, Plymouth and Duxbury procedures provide for closure of the beach areas at the Alert stage. A Declaration of a State of Emergency is not needed to implement these Town actions. See Town of Plymouth IP-15 (Draft-2, June 29, 1990), entitled "Gurnet/Saquish Association" pp. 2-3; Town of Duxbury IP-15 (Draft-5, April 2, 1990), entitled "Conservation Department"; Town of Duxbury, IP-11 (Draft-6, April 5, 1990), entitled "Harbormaster".

Both MCDA and MDPH played an integral role in developing and approving the exercise scenario to ensure that it was realistic.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-2:

"5. 9:00 - 11:00 am - Buses scheduled to arrive from Bridgewater never arrived. Among other things, the bus's plan states that they are not to mobilize until a site area emergency is declared; not at an alert stage. The buses that were supposed [sic] to arrive to evacuate the schools and beaches simply did not come."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

The observation above reflects a misunderstanding of planning policy and procedures, as well as how the exercise was conducted. Plans call for mobilization of school buses at the Alert classification and all other buses at Site Area Emergency classification. See Town of Duxbury RERP (Draft 7, December 1, 1989), section II.D.

The agreed upon extent of play for school bus transportation involved one bus for Duxbury High School, one for Duxbury Intermediate, and one for a Duxbury day care center. All other transportation was simulated. Participants in the exercise were informed by Exercise Controllers that mobilization of all other transportation resources was to be simulated. The extent of play for the buses did not require that actual buses be dispatched to pick-up points such as the beaches.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-3:

"6. The buses from Duxbury arrived at the schools, but their departure was delayed because the host schools were not seized under the supposed state of emergency. The state of emergency had been declared, but the town had not been notified which, if any, schools had been seized or selected."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

Demonstration of the host school (Criminal Justice Training Center) for Duxbury was not an objective of the October 1989 exercise. See Memorandum from Mr. Robert Boulay (MCDA Director) October-6, 1989 concerning Wellesley Reception Center extent of play. For this reason, the Town did not receive information from the Commonwealth concerning host schools during the exercise.

Current status of the host schools is addressed in the Response to Item Tr-5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-4:

"7. 11:05 - Emergency Broadcast System Activated - Two and one half hours after the alert was declared."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

The statement does not represent a planning issue. However, under certain circumstances, the Commonwealth may, at its discretion, direct activation of the sirens and EBS during an Alert classification. According to the plans, sirens and EBS are not typically activated until a Site Area Emergency. See MCDA IP-01 (Draft-6, July 9, 1990), entitled "MCDA Director".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. T-46 S:

" 11:20 - Sirens activated, advising sheltering. However, through error, the sirens also had been activated earlier, before the schools had been 'evacuated'.

Note: At this point in time, the general population has had 15 minutes to 'evacuate', and the school buses have been under way for 8 minutes. The buses will still [sic] be in Duxbury and will be in traffic on Route 14, a small country road heading to Route 3, in the midst of general evacuation traffic."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

Sirens may be activated more than once during an emergency. For a description of siren activation policy, see Town of Duxbury RERP (Draft 7, December 1, 1989) Section II.E.

Objective 12 concerning the ability to alert the public using sirens was successfully demonstrated during the October 1989 exercise. See FEMA's Final Exercise Assessment (August 27, 1990) pp. 44-45.

The statements in the "Note" are incorrect both with regard to the exercise demonstration and emergency procedures in place. During the October exercise, the Duxbury schools simulated precautionary transfer at Site Area Emergency per procedures at 11:02 (See School Superintendent Kennedy's log, attached). A General Emergency was not declared until 12:00. An evacuation protective action recommendation was not issued for Duxbury by the Commonwealth until 12:51, almost two hours after school buses had departed. (See Communications Officer and Status Boards Keeper logs, attached.)

Exercise demonstrations were consistent with planning policy in this regard. Plans and procedures reflect mobilization of school transportation resources at the Alert classification and precautionary transfer to host facilities at a Site Area Emergency. The intent of this policy is to minimize

Item No. Tr-A6-5: (cont.)

the possibility of having to move school children at the same time evacuation of the general public is in process. The public would not be evacuated before a general emergency classification. See Town of Duxbury RERP (Draft 7, December 1, 1989), section II-D for school emergency planning provisions.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Individual Log Form

Date 10/10/89

Name Kennedy
FEOC Position Schools

(43)

Log #	Time Initiated	Action / Issue	Message #	Persons Contacted	Item Closed
25	1035	Inform ASC that Day/Book, Symp, Gen			
26	1030	Learned Police will not come to Ashbury			
27		and attending of same; inform ASC to see			
28	1035	Tell DHS and DIS (Admitt) that ET			
28	1046	Tell ASC of Site Area Emergency; bus			
29	1051	Bus in front of DIS/DHS; no way			
30	1102	Bus left (DIS 5:1107) (MARR)			
31	1100	Temp. Card. response #30			
32	1134	DHS Admitt. in place (B. G. coming)			
32	1125	DIS " " (bus has gone) / ICH, DECO			
34	1140	Inform of bus leaving (1107) with ASC			
35	1146	Inform of bus leaving (1107) with ASC			
36	1158	Inform of bus leaving (1107) with ASC			

Item No. Tr-A6-6:

"Chief of Police Cappuccio [sic] spent two hours attempting to reach the state police and gain their help to find the buses. There was NO SUCCESS in even reaching the State Police.

For over two hours, all forms of communication were used to try to reach the Criminal Justice Training Center. All were unsuccessful."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

The designated contact for EPZ town EOC Police representatives, the State Police Troop D EOC representative, was activated and dispatched to the MCDA Area II EOC at the Alert classification. IP-09 (Draft-3, July 12, 1990) Area State Police Troop D, p. 4. Besides the use of commercial telephone, Boston Edison designed, and installed the Boston Edison Communications Offsite Notification System (BECONS). This dedicated radio system has the capability of providing a direct link between the EPZ town facilities (24-hour point and EOCs) and the Commonwealth facilities (including the State Police). Duxbury and the State Police also are able to access the country-wide police frequency referred to as F1.

With regard to attempts to contact the Criminal Justice Training Center serving as the host school, as pointed out earlier in Response to Item TR-A6-3, this facility was not a participant in the exercise by prior agreement.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-7:

"13. 1:10 pm - Buses have not been heard of in 2 hours, and concern in the EOC is rather high. BECO solves the anxiety and any concomitant problem: Barney Yetman, a BECO employee handed a note to a female BECO employee to give to Richard Marcoux, the Duxbury School Representative. The note stated:

'Buses safely arrive at 1:10 Needham. This is only a simulation.....'

In fact, there was not confirmation of this by the transportation officer through any official sources. Actual confirmation that the buses had arrived safely was not made until the next day. And the only confirmation was that they had arrived at a site where NO DECONTAMINATION WAS POSSIBLE."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

The information inserted by the exercise controller, was a planned message formally submitted as part of the approved scenario.

Monitoring and decontamination are done at reception centers, not host schools. School children are moved to host facilities at a Site Area Emergency as a precaution before any offsite radiation release is possible.

See Town of Duxbury RERP (Draft 7, December 1, 1989), Figure D-1, p. II-D-6.

See Response to Item Tr-123.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-8:

"14. 1:30 pm - Mrs. O'Brien arrived in Wellesley and found no equipment or personnel in place. She was informed by D.W workers that the exercise terminated at 1:00 pm."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment 1-Memo to FEMA, NRC.

Boston Edison Response:

Wellesley Reception Center facilities were demonstrated out-of-sequence per prior agreement and as submitted in the approved scenario. See the attached scenario timeline for the Wellesley facility from the Pilgrim 1989 FEMA/NRC Evaluated Exercise Scenario, Volume B, Part 1.

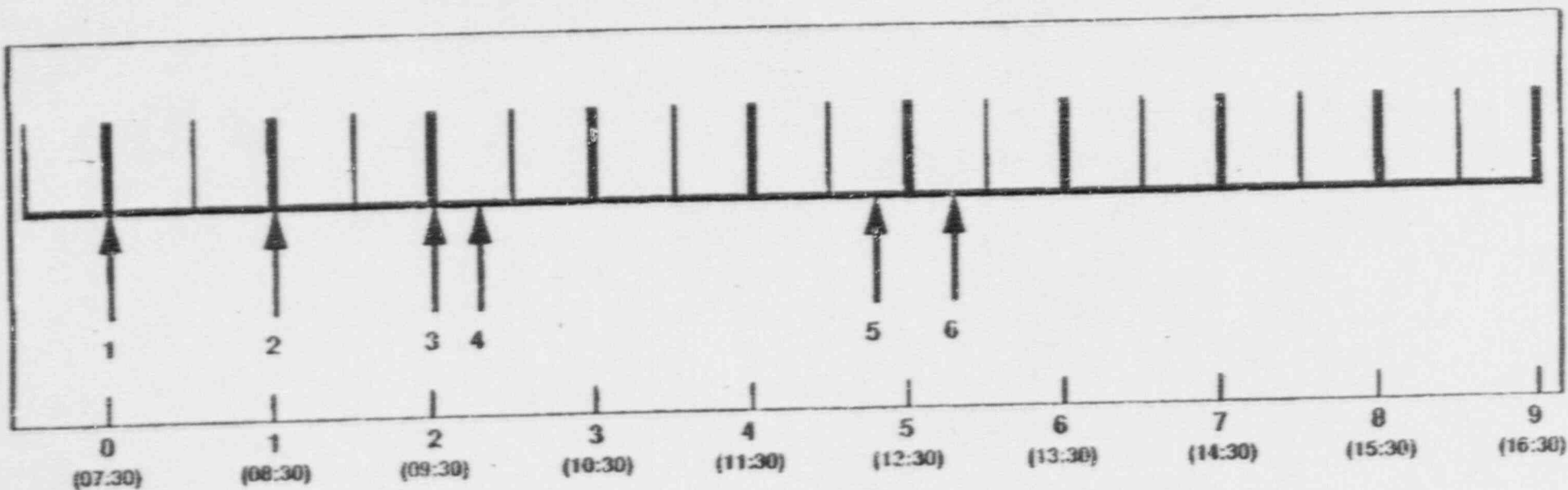
CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Wellesley Reception Center Timeline



1. Controllers and Evaluators preposition at Reception Center.
2. Reception Center and Monitoring / Decontamination staffs receive notification.
3. Simulated evacuees assembled.
4. Reception Center operational. Processing of evacuees begins.
5. Evaluation of Reception Center completed. Critique begins.
6. Critique completed. Participants released.

Item No. Tr-A6-9:

"[N]early all the information in the [public information] booklet, even when it was finally issued, was inaccurate; nothing was correct except for sub-area designations and civil defense directors' phone numbers. This information was presented to Commissioner Carr on October 12, 1989."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment I-Letter from J.A. Fleming to A.R. Blough (NRC).

Boston Edison Response:

The comments provided to NRC Commissioner Carr on the public information brochure appear to be enclosed as pages 12 - 15 of Attachment 6 to Transcript of the September 6, 1990 Public Meeting. In general, those pages identify the same issues to which Boston Edison has already provided a response elsewhere in this report. The 1989 public information brochure underwent many reviews and revisions by expert agencies - among them MCDA, MDPH, FEMA and Boston Edison. The brochure was ultimately approved for public distribution by the Commonwealth, based on MCDA's assessment that the brochure was in compliance with Commonwealth and federal criteria.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-10:

"Sirens inaudible from many locations in town (has been reported to NRC on numerous occasions)."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment V-Comments on Emergency Information Brochure.

Boston Edison Response:

Boston Edison has installed a Prompt Notification System (sirens) that meets applicable federal standards. See Response to Item Tr-45.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-11:

"Emergency Broadcast System

- Local radio stations have no general info on E.P. provided to them by BECO.
- Stations find E.B.S. communication chain unreliable and untimely."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment V-Comments on Emergency Information Brochure.

Boston Edison Response:

With regard to the first point, representatives from the Towns, the Commonwealth and Boston Edison are invited to participate in an annual media orientation program. The program is intended to familiarize the news media with Town emergency response plans, health effects of radiation, official points of contact for release of information and the need for accurate and timely reporting of information during an emergency. See EPZ Town RERP, Section II, Part G, 6. EBS radio station personnel are invited to attend this Orientation. At the Orientation, the news media are provided a tour of the Media Center or other emergency response facilities. Any media who are invited and cannot attend are mailed a copy of the handouts after the orientation.

In addition, the local EBS radio stations are contacted one month, two weeks, and one day prior to each drill or exercise in which they are involved, in accordance with MCDA IP-12 (Draft-4, May 14, 1990), Drill/Exercise Checklist-Emergency Broadcast System, entitled "MCDA Public Affairs Office".

Concerning the second point, "Part 3: EBS Activation" of the above referenced procedure also describes the actions for activating the EBS, including provisions for contacting the primary and secondary EBS stations at the time of the emergency, placing them on stand-by and coordinating the activation of the EBS. Additionally, the Commonwealth's Radiological

Item No. Tr-45-11: (cont.)

Emergency Response Plan refers to the Massachusetts Emergency Broadcast System Operational Plan, which provides a description of the methods and procedures used by the broadcast industry, the Commonwealth, and local governments for issuing information over the EBS. This system is regularly tested.

It should be noted that there is no EBS specifically for Pilgrim emergency planning. Instead, Pilgrim emergency planning takes advantage of the pre-existing EBS used for all types of emergencies occurring within the Commonwealth.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable.

Item No. Tr-A6-12:

"Instructions are geared to slow-breaking accidents only thereby omitting plans for other potential scenarios."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment V-Comments on Emergency Information Brochure.

Boston Edison Response:

The offsite emergency implementing procedures are designed to address a broad range of events. For example, the procedures include specific provisions for evacuation of beaches and schools in the event of a General Emergency, as well as for precautionary transfer of students and closure of beaches at the "Alert" stage. The procedures were developed to address a range of scenarios and protective actions in accordance with applicable federal guidance. See Town of Duxbury IP-02 (Draft-9, May 10, 1990), entitled "Civil Defense Agency" pp. 3-22 .

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-13:

"Traffic management, etc. is handled by State Police and support group - They will not be called out until Gov. calls for State of Emergency."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment V-Comments on Emergency Information Brochure.

Boston Edison Response:

State Police EOC personnel begin to mobilize at the Alert and troopers man traffic control points at the Site Area Emergency regardless of a State of Emergency Declaration by the Governor. This is reflected in their procedures. See Area II IP-09 (Draft 3, July 12, 1990), entitled "State Police Troop D Middleborough" pp. 4 - 5. Selected traffic control points were demonstrated during the October 1989 exercise.

Further, any time the Commonwealth determines that there is a need to obtain emergency support resources, MCDA has the authority to request a gubernatorial declaration to make needed resources available. The Commonwealth procedures reflect consideration of this option beginning at an Alert. See MCDA IP-01 (Draft-6, July 9, 1990), entitled "MCDA Director", p. 8.

Other agencies involved in traffic control include town police departments and the Plymouth County Sheriff's Department. Neither of these groups' emergency responsibilities are limited by the Commonwealth's State of Emergency Declaration.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-14:

"Host school directions will be posted on the school doors after all children are evacuated - this procedure will cause parents working outside the area to have to drive back to area to determine location of host schools...."

Source: Transcript Attachment 6. Letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment V-Comments on Emergency Information Brochure.

Boston Edison Response:

There is no need for parents to drive to the school to obtain information on the location of students. As a matter of policy, parents are discouraged from attempting to pick up children at the schools due to the obvious traffic and logistical problems this could create for school officials. Instead, parents are educated concerning the emergency measures planned for their children in a radiological emergency - especially movement to host facilities. This is accomplished through several methods.

MCDA has requested that the schools which take part in the radiological emergency preparedness program distribute annual letters to parents from school officials that address these issues. For example, for this school year, it is our understanding that the Plymouth School Department is preparing to issue the letters within the next few weeks pending the school committee's approval at the joint October 23, 1990 meeting.

In addition to the letters, EBS messages broadcast at the time of the event include host school information. See MCDA IP-12 (Draft-04, May 14, 1990), entitled "MCDA Public Affairs Officer", Message C, pp. 15-19.

Item No. Tr-A6-14: (cont.)

Postings at the evacuating schools provide directions to the host facility as a redundant feature designed to ensure that any parents not getting the information through the primary sources listed above will be informed.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A6-15:

"A new problem that presented itself was the Alden School Fifth Grade Outdoor School. 124 fifth graders and 12 staff members were at Camp Squanto, Plymouth for three days and nights. This activity is part of the school curriculum and the children are technically "in school". As the drill took place, I carefully notified all responsible parties along the way. The end result was these children fell through the cracks. After notification of the situation by a parent: Chief O'Neill, Duxbury Civil Defense and Doug Hadfield, Plymouth Civil Defense did communicate with each other concerning this problem. It was determined hours later that Plymouth would have been aware of these school children but they would fall under the Camp I.P. not the schools. [T]hese children would not have fallen into the 'precautionary transfer' of school children and no communication would have been issued informing parents of their whereabouts. Indeed these children would have been left at Camp Squanto. Their buses would have been pressed into service elsewhere and they would have no way out. Parents would not have received any public notification of this."

Source: Transcript Attachment 6. letter from Neil M. Johnson (Chairman RERPC) to David Vogler re: recommendation to forward RERP Questions and J. Fleming allegation to FEMA, attachment Remedial Exercise to Address Deficiencies noted in the Feb. 1, 1990 Preliminary Deficiencies Report.

Boston Edison Response:

Camp Squanto has its own emergency procedure. It includes notification by the Town of Plymouth Health Officer; mobilization of required transportation resources; and precautionary transfer or evacuation to host facilities. See Town of Plymouth IP-72 (Draft-2, August 10, 1990), entitled "Camp Squanto". See also Town of Plymouth IP-07 (Draft-4, June 30, 1989), entitled "Board of Health" pp. 3, 12. Under the provisions of these procedures students would have been transferred to host facilities at the Site Area Emergency classification. However, this demonstration was not planned as part of the May 1990 remedial exercise and Camp Squanto was not a participant. Therefore, these arrangements would not have been observed during the exercise.

Item No. Tr-A6-15: (cont.)

Further, the Duxbury School Procedure calls for the School Superintendent to verify, "...that all principals are notified of the emergency, and discuss the potential cancellation of extracurricular activities." See Town of Duxbury IP-06 (Draft 9, September 21, 1990), entitled "School Department" p. 6.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A7-1:

- "1. What are the decontamination factors for the pool for various isotopes? In other words, how well does the wet well pool scrub out the fission byproducts, keeping the radioactive particles from releasing to atmosphere?
2. Please provide a graph of offsite radiation doses based on the possibility of a vacuum breaker valve remaining open at 10%, 25%, 50%, and 100%.
3. The NRC recommended venting at the containment design pressure as a minimum, or in the case of PNPS, 60 psi. Why is the PNPS DTVS rupture disk set at half that, at 30 psi?
4. What is the minimum containment pressure allowed by procedures at which the operators could open the DTVS outboard containment valve, AO-5025?
5. Please provide information on the reliability of the hydrogen and oxygen concentration monitor at PNPS. What percentage of the time have both systems been accurately functioning?
6. Does the NRC concur that the use of the DTVS does not involve an unreviewed safety question?
7. Does the NRC concur that the installation of the DTVS does not require changes to Pilgrim's Technical Specifications[?]
8. Does the NRC judge the DTVS to improve the safety of PNPS?
9. Does the NRC conclude that the installation and use of the DTVS are acceptable under the provisions of 10 CFR 50.59?
10. Does the NRC conclude that BECo has adequately considered the technical issues germane to the DTVS?
11. Why was the automatic reclosure on high radiation of valve AO-5025 deleted during the design revision of the system?
12. Generic Letter 89-16 indicates some benefit of a hardened wet well vent to reduce core damage frequencies during SBO and ATWS accident scenarios. Is this true for Pilgrim?"

Source: Transcript Attachment 7. Pilgrim Direct Torus Vent - Presented to: Massachusetts Subcommittee on Energy by David C. Dixon.

Item No. Tr-A7-1: (cont.)

Boston Edison Response:

These twelve questions were previously asked of the NRC by the Plymouth Nuclear Matters Committee. Boston Edison responded to the questions in a meeting on July 11, 1990 between Boston Edison Company representatives and members of the Plymouth Nuclear Matters Committee, and in a follow-up letter of July 31, 1990.

The viewgraphs that outline the highlights of the response presented to each of the twelve questions at the July 11, 1990 meeting are attached, as well as the July 31, 1990 follow-up letter.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

ANSWER TO QUESTION 1

- **THE WETWELL POOL SCRUBBING EFFICIENCY IS A FUNCTION OF POOL WATER DEPTH, VENTING RATE, DISCHARGE RATE FROM THE REACTOR PRESSURE VESSEL AND POOL TEMPERATURE. IF VENTING OCCURS AFTER CORE DAMAGE THE SCRUBBING EFFICIENCY IS EXPECTED TO BE 99% FOR PARTICULATE FISSION PRODUCTS**

ANSWER TO QUESTION 2

- **THE ANALYSIS SUGGESTED IS NOT RELEVANT TO USE OF THE VENT**
 - **THE PRINCIPAL USE OF THE VENT IS PRIOR TO OCCURRENCE OF CORE DAMAGE AND THE EXISTENCE OF FISSION PRODUCTS IN CONTAINMENT**
 - **OPERATION WITH AN OPEN VACUUM BREAKER IS NOT ALLOWED AND THE SHUT CONDITION OF THE VACUUM BREAKERS IS CONTINUOUSLY MONITORED BY TORUS TO DRYWELL PRESSURE DIFFERENCE AND VACUUM BREAKER POSITION INDICATION DURING OPERATION**
- **VENTING TO THE HIGH RELEASE POINT REDUCES OFF-SITE RADIATION DOSE COMPARED TO THE DOSE FROM GROUND LEVEL RELEASES FROM FAILED CONTAINMENT**

ANSWER TO QUESTION 3

- **A RUPTURE DISK SET PRESSURE OF 30 PSI PROVIDES GREATER MARGIN TO CONTAINMENT DESIGN PRESSURE DURING A SEVERE ACCIDENT**
- **THE RUPTURE DISK HAS BEEN SET AT 30 PSI TO PREVENT VENTING UNDER DESIGN BASIS ACCIDENT CONDITIONS**
- **VENTING IS NOT NEEDED FOR DESIGN BASIS ACCIDENTS (UP TO 28 PSI)**

ANSWER TO QUESTION 4

- **CURRENTLY PROCEDURE 5.4.6, "PRIMARY CONTAINMENT VENTING AND PURGING UNDER EMERGENCY CONDITIONS", ALLOWS USE OF THE VENT FOR PRESSURES \geq 30 PSI**

ANSWER TO QUESTION 5

- **PILGRIM HAS TWO INDEPENDENT TRAINS OF POST ACCIDENT HYDROGEN AND OXYGEN MONITORING. ONLY ONE TRAIN IS REQUIRED FOR THE SYSTEM TO BE OPERABLE**
- **BOTH TRAINS WERE PLACED IN OPERATION IN JANUARY 1985 AND THE SYSTEM RELIABILITY HAS BEEN 100%**
- **ONE TRAIN WAS INOPERABLE FOR TWO DAYS IN NOVEMBER 1985**
- **ONE TRAIN WAS INOPERABLE FOR FOUR DAYS IN JANUARY 1990**

ANSWER TO QUESTION 6

- **PERFORMING A FACILITY CHANGE UNDER NRC REGULATION 10CFR 50.59 DEFINES THAT NO UNREVIEWED SAFETY QUESTION EXISTS CONCERNING THE CHANGE**
- **THE NRC STATED IN "SUPPLEMENTAL ASSESSMENT OF THE PILGRIM SAFETY ENHANCEMENT PROGRAM" DATED OCTOBER 12, 1988 THAT THE PROGRAM WAS BEING PERFORMED UNDER 10CFR 50.59**
- **GENERIC LETTER 89-16: "INSTALLATION OF HARDENED WETWELL VENT" THE NRC ADOPTED PILGRIM'S DESIGN AND ENCOURAGED LICENSEES TO INSTALL A DIRECT TORUS VENT UNDER 10CFR 50.59**

ANSWER TO QUESTION 7

- **PERFORMING A FACILITY CHANGE UNDER NRC REGULATION 10CFR 50.59 DEFINES THAT NO TECHNICAL SPECIFICATION CHANGE IS REQUIRED**
- **THE NRC STATED IN "SUPPLEMENTAL ASSESSMENT OF THE PILGRIM SAFETY ENHANCEMENT PROGRAM" DATED OCTOBER 12, 1988 THAT THE PROGRAM WAS BEING PERFORMED UNDER 10CFR 50.59**
- **GENERIC LETTER 89-16: "INSTALLATION OF HARDENED WETWELL VENT" THE NRC ADOPTED PILGRIM'S DESIGN AND ENCOURAGED LICENSEES TO INSTALL A DIRECT TORUS VENT UNDER 10CFR 50.59**

ANSWER TO QUESTION 8

- **IN GENERIC LETTER 89-16 "INSTALLATION OF HARDENED WETWELL VENT" THE NRC ADOPTED PILGRIM'S DESIGN OF DIRECT TORUS VENT**
- **THE NRC HAS STATED IN GENERIC LETTER 89-16 THAT VENTING CAN REDUCE THE LIKELIHOOD OF CORE MELT BY A FACTOR OF 10**

ANSWER TO QUESTION 9

• **THE NRC HAS STATED IN A LETTER TO MR P.W. AGNES DATED SEPTEMBER 26, 1988 THAT BOSTON EDISON'S SAFETY ENHANCEMENT PROGRAM MODIFICATIONS WERE PERFORMED UNDER THE PROVISIONS OF 10CFR 50.59**

ANSWER TO QUESTION 10

- **BOSTON EDISON HAS ADEQUATELY CONSIDERED TECHNICAL ISSUES GERMANE TO THE DIRECT TORUS VENT, AS CONCLUDED BY THE ISSUANCE OF GENERIC LETTER 89-16 "INSTALLATION OF HARDENED WETWELL VENT" WHICH ADOPTED PILGRIM'S DESIGN OF A DIRECT TORUS VENT**

ANSWER TO QUESTION 11

- **TO PREVENT ADVERSE EFFECTS ON EXISTING SAFETY RELATED CIRCUITS**
- **TO AVOID COMPLICATIONS THAT COULD PREVENT VENTING**

ANSWER TO QUESTION 12

- **YES, THE DIRECT TORUS VENT WILL BENEFIT PILGRIM SINCE IT WILL PROVIDE A 1% DECAY HEAT REMOVAL CAPABILITY UNDER STATION BLACKOUT AND ANTICIPATED TRANSIENT WITHOUT SCRAM CONDITIONS**

Tr-A7-7

BOSTON EDISON
Nuclear Information Division
488 State Road, Suite 5
Plymouth, Massachusetts 02360
(508) 746-0912

July 31, 1990

Mr. Gerry Hayes, Chairman
Nuclear Affairs Committee
Town Hall
11 Lincoln Street
Plymouth, MA 02360

Dear Chairman Hayes:

The purpose of this letter is to provide your committee with the follow up information promised at our July 11, 1990 meeting on the Direct Torus Vent. Additionally, as requested, Boston Edison's Emergency Preparedness Department will schedule and conduct a briefing session for Doug Hadfield on the effect of the Direct Torus Vent on Plymouth's Radiological Emergency Response Plan (RERP).

The Nuclear Engineering Division has provided the following information for your review:

A. Reference for Scrubbing Effectiveness of Torus Water

"Nuclear Power Plant Response to Severe Accidents" IDCOR Technical Summary Report, November 1984.

B. Actions to be taken if both hydrogen analyzers are inoperable.

The following paragraph has been approved by the BWR Owners Emergency Procedures Committee to be added to Appendix B of the Emergency Procedure Guidelines.

Failure or unavailability of hydrogen or oxygen monitoring systems does not necessarily mean that hydrogen and oxygen concentrations cannot be determined. Rather, operator judgment is required when making that decision after examining related plant conditions. When hydrogen or oxygen concentrations are not continually monitored, the operator does not know the exact level at any specific time, even during normal plant operations. However, if the operator has reasonable assurance that a transient has not occurred which has uncovered the core (i.e. water level has not dropped below TAF), then it is likely that significant hydrogen has not been produced. On the other hand, if an event has occurred and water level cannot be determined or did in fact drop below TAF, then the operator has reason to be concerned that significant amounts of hydrogen may have been generated unless alternate methods of

determination indicate time delay, or deduction based on actual plant status. Deduction, which may be inconclusive, may be based on, for example, plant conditions with the potential for radiolysis of water, the status and operation of the feedwater hydrogen injection system, de-inertion of the containment during startup or shutdown, actuation of reactor building-to-containment vacuum breakers, loss of instrument air pressure (leaks) within the containment, or from the combination of SRV actuations and drywell pressure indications.

Sincerely,


David F. Tarantino
District Manager

DFT/dm

cc: Ed Wagner
Ron Varley
John Geraty
Petros Antonopoulos

Item No. Tr-A14-1:

"2. Enhance development of Recovery and Re-entry Procedures."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1-Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

Each member of the Town emergency response organization with a role in the reentry and recovery portion of an emergency response has detailed steps in their implementing procedure describing necessary tasks. See Town of Duxbury IP-02 (Draft-9, May 10, 1990), entitled "Civil Defense Agency" pp. 19-21. Reentry and recovery tasks are also covered in annual IP training.

During the October 1989 exercise, the second day, October 13, was dedicated to demonstrating recovery and reentry. FEMA's Final Exercise Assessment stated that the Commonwealth and towns met exercise objectives in this regard. On page 85, the FEMA report stated, "the ability to implement appropriate measures for controlled reentry and recovery was successfully demonstrated by the State of Massachusetts and the five EPZ communities of Plymouth, Duxbury, Kingston, Carver and Marshfield on Day 2 of the exercise."

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-2:

"5. Re-assessment of staging area functions and capabilities."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1-Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

It is our understanding that this item relates to communications capabilities between the Duxbury Town EOC and the staging area at the Marshfield Martinson Junior High School.

Primary method of communication between Duxbury EOC and the Marshfield Martinson Junior High School is RACES radios with commercial telephones as a backup. Boston Edison provided a RACES radio to the Duxbury EOC for this purpose, as well as to the staging areas. A permanently mounted antenna for the RACES radio at the staging area was not available during the October 1989 exercise. Boston Edison is prepared to install this antenna as soon as details are worked out with Marshfield officials, as to the location on the school building where the antenna should be mounted.

CORRECTIVE ACTIONS:

Install permanent antenna.

SCHEDULE FOR COMPLETION:

Boston Edison anticipates agreement with Marshfield officials and completion of the installation of the antenna by 12/90.

Item No. Tr-A14-3:

"6. Review Harbormaster and Coast Guard I.P.'s for accuracy."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectman, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1-Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

It is our understanding that this is an exercise simulation item not a planning item. For the October 1989 exercise, the Coast Guard was not a full participant in accordance with the agreed upon extent of play. During the exercise, when the Duxbury Harbormaster contacted the local Coast Guard station, he was surprised to find Coast Guard personnel knew little about the exercise. This raised concerns on the part of the Duxbury Harbormaster as to whether they were adequately integrated into the plans. The Coast Guard facility contacted by the Harbormaster was not, by the agreed upon extent of play, a participant in the October 1989 exercise. However, existing Coast Guard procedures address notification of the Coast Guard and their activities in the event of an emergency at Pilgrim. See U.S. Coast Guard IP-01 (Rev. 0 November 2, 1988). In any event, the Coast Guard procedure can be made available for the Harbormaster's review by contacting the responsible Commonwealth officials.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-4:

- "7. Review feasibility of sheltering and protective clothing for Harbormaster and Conservation personnel."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectman, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1-Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

As designated emergency workers, the Harbormaster staff is tasked to clear the waterways of boaters, while Conservation Department coordinates beach alerting response on Duxbury Beach. The same emergency worker exposure controls are in place for Harbormaster and conservation personnel as for other emergency workers. They are issued dosimetry, instructed on its use, and on Protective Action Guide exposure limits for emergency personnel. In addition, procedural mechanisms are in place to withdraw personnel from the field if certain exposure thresholds are reached. See Town of Duxbury IP-11 (Draft-6, April 5, 1990), entitled "Harbormaster" pp. 14-18. See also Town of Duxbury IP-15 (Draft-5, April 2, 1990), entitled "Conservation Department" pp.16-20.

More importantly, in the cases of both the Harbormaster and Conservation personnel, their task of alerting personnel should be completed at the Alert classification well before any offsite release of radiation would occur.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-5:

- "8. Determination of need for LOA's between State, Local, and Federal Agencies."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

See Response to Item Tr-151.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-6:

"13. Completion and mailing of new public information booklet."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

This is listed as an open item in the Duxbury status report. It is not an open emergency planning item, but rather an element of annual program maintenance.

The last mailing of the public information brochure occurred in August 1989. This year's brochure has been modified to include a calendar. The final draft has been reviewed by FEMA, the Commonwealth and the Towns. It is scheduled for distribution to the public before the end of 1990.

Regulatory requirements and FEMA regulations (NUREG-0654, FEMA-REP-1, Rev. 1, Part G) stipulate distribution of public information documents "at least annually". The Pilgrim offsite public information program meets this requirement.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-7:

"1. Re-evaluate paging capabilities."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

This is listed as an open equipment item in the Duxbury status report. Boston Edison has provided pagers for each town's key emergency operations center staff. Duxbury has expressed concern that the pagers do not have a wide enough range to alert those who work outside of Duxbury.

Key EOC positions are staffed with primary and alternate personnel to maximize response capability. Pagers are only one means for reaching key personnel notification. These contingencies are covered in existing Duxbury notification procedures. See Town of Duxbury IP-04 (Draft-13, May 10, 1990), entitled "Fire Department", Attachment 3.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-8:

"2. Improve communication between EOC and DPW."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

This is listed as an open equipment item in the Duxbury status report. Boston Edison is continuing to work with Duxbury Town officials to improve this communications path. Commercial telephone communications to the DPW Barn through the Town switchboard is available, as well as radio communications. We are investigating other possible options for communications between the Duxbury EOC and DPW Barn. However, this represents an enhancement to what we believe is an already adequate system.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-9:

"4. Require additional CDV-700's for EWMDS."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

We understand that the Town identified the need for two additional survey meters for their Emergency Worker Monitoring and Decontamination Station (EWMDS) after the October 1989 exercise. While Duxbury currently possesses three survey meters, additional meters are available through the Commonwealth. It is our understanding that as of this date the Town has not made such a request.

CORRECTIVE ACTIONS:

Boston Edison planners will meet with Duxbury Officials to encourage them to seek additional meters from the Commonwealth.

SCHEDULE FOR COMPLETION:

11/90

Item No. Tr-A14-10:

"5. Questionability of shelf life of KI."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

The manufacturer has extended the shelf-life to 1991 of the "lot" of KI that is currently in place at locations identified in the plans and procedure. See attached letter.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

WALLACE LABORATORIES

DIVISION OF CARTER-WALLACE, INC.
HALF-ACRE ROAD • P. O. BOX 1001*Cranbury*  *New Jersey*
08512-0181

June 19, 1990

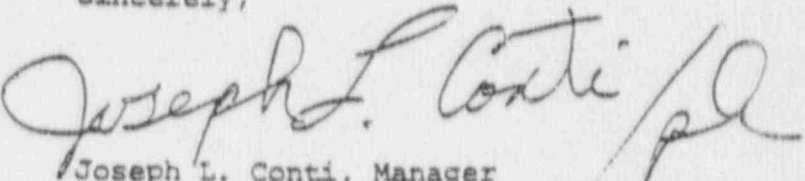
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Building T-3710 (MANG)
Ft. Devens, MA 01433-5780

Dear Mr. Ares,

We are pleased to advise you that the shelf life of "Thyro-Block", the Wallace brand of potassium iodide, lot number U191W, has been extended to October 1991.

If we can be of further assistance, please contact us.

Sincerely,


Joseph L. Conti, Manager
Sales Service

ph

Item No. Tr-A14-11:

"6. Portables needed for Life Guards at Duxbury Beach."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NR's Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

The Conservation Department route alerts the Duxbury beaches. Boston Edison has provided the Conservation Department with eight radios for beach alerting. Lifeguards are referenced in procedures as assisting conservation personnel to clear the beach but do not fulfill a primary role. No additional communications have been demonstrated as necessary to perform this task.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-12:

- "7. Older equipment issued previously provided by Boston Edison is not covered under the new equipment maintenance agreement."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 1 - Duxbury Emergency Preparedness Status as of 9/5/90.

Boston Edison Response:

The Boston Edison Comprehensive Grant Agreement established the terms of these arrangements with Duxbury. It is specifically limited to maintenance of equipment from the effective date of the Agreement (in this case May 18, 1988). Paragraph 15 clearly states that the Comprehensive Maintenance Agreement supersedes all previous agreements. The document was signed by responsible Duxbury officials. A copy of the Duxbury agreement is attached.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

BOSTON EDISON COMPANY
CIVIL DEFENSE COMPREHENSIVE
GRANT AGREEMENT

WHEREAS, the Town of Duxbury, Massachusetts ("the Town") has certain responsibilities under state law to establish a local organization for civil defense and perform civil defense functions as defined in Massachusetts General Laws, Spec. L. Chapter 31; and

WHEREAS, the civil defense responsibilities of the Town's local organization for civil defense include emergency planning and preparedness in regard to Boston Edison Company's ("the Company") Pilgrim Nuclear Power Station ("Pilgrim Station") located in Plymouth, Massachusetts; and

WHEREAS, it is in the interest of both the Company and the Town for the Company to provide to the Town various services, equipment, supplies, materials and funds so that the Town may fulfill its civil defense responsibilities, including its emergency planning and preparedness responsibilities; and

WHEREAS, the Town is willing and entitled to accept such services, equipment, supplies, materials and funds by way of grant for purposes of civil defense, as defined in and permitted by Massachusetts General Laws, Spec. L. Chapter 31;

NOW THEREFORE, in accordance with the provisions of NUREG 0654 FEMA-REP-1, Rev. 1 and Massachusetts General Laws, Spec. L. Chapter 31, Section 15, and

for and in consideration of the mutual promises and agreements contained herein the Company and the Town agree as follows:

1. Grant Assistance Provided: The Company agrees, subject to the terms and conditions set forth herein, to provide the Town with services, equipment, supplies, materials and funds by way of grant to assist the Town in meeting its civil defense responsibilities under various state and federal laws and regulations as such pertain to the preparation and implementation by the Town, its employees and authorized representatives of the Town's Radiological Emergency Response Plan. For purposes of this Comprehensive Grant Agreement the term "authorized representatives" includes volunteer workers who are identified in the Town's Radiological Emergency Response Plan as having a responsibility during a response to an incident at Pilgrim Station.

2. Authorized Use of Comprehensive Grant Funds: The parties hereto agree that the funds provided by the Company to the Town, pursuant to this Comprehensive Grant Agreement shall be used for purposes of civil defense, as defined in Massachusetts General Laws, Spec. L. Chapter 31, and in accordance with 10 CFR 50, Appendix E, entitled "Emergency Planning and Preparedness for Production and Utilization Facilities" and NUREG 0654, for the express benefit and for the protection of the health and safety of the residents of the Town in preparing for and in response to a radiological emergency at Pilgrim Station or any other civil defense function, all as required by state and federal laws and regulations.

3. Compensation for Training and Drill Expenses: The preparation and implementation of the Town's Radiological Emergency Response Plan will require that the Town's employees and authorized representatives, in conjunction with the Company and various state and federal agencies, participate in training and periodic drills. The Company agrees to compensate the Town for all payments which represent wages paid or required to be paid by the Town to its employees or authorized representatives during their participation in training and drills. Payments for wages shall not exceed rates or limitations under which the Town normally compensates its employees and the Company shall pay the Town for only those wage expenses which represent payment for work performed either outside the employee's or authorized representative's normal work schedule.

It shall be the responsibility of the Town's director of its local civil defense organization to compile, review and approve in writing all requests for payments of wages described herein and to submit said requests to the Company on a monthly basis. The Company shall make payment to the Town within forty-five (45) days of its receipt of the Town's request for payment. Upon receipt of payment from the Company, it shall be the Town's responsibility to disburse the funds to the named recipients in accordance with state and federal wage laws, rules and regulations.

4. Accounting For Grant Funds: The Town shall keep and maintain such books, records and other documents as shall be necessary to reflect and disclose

fully the amount and disposition of any funds provided by the Company under this Agreement, including the total cost and description of activities paid for, in whole or in part, with such funds, and the amount and nature of all expenditures related to such activities which are supplied or to be supplied by other sources. All such books, records and documents shall be available at office of the Town Accountant for inspection, copying, audit and examination at all reasonable times by any duly authorized representative of the Company.

5. Grant of Services, Equipment, Supplies and Materials: From time to time upon receipt of a written request from the Town's director of its local civil defense organization the Company may grant to the Town services, equipment, supplies and materials which will assist the Town in fulfilling its civil defense responsibilities, including the preparation and implementation of the Town's Radiological Emergency Response Plan. Any such grant shall be made in writing by an authorized employee or representative of the Company. Such writing shall describe in reasonable detail the services, equipment, materials or supplies which the Company shall provide to the Town. All such equipment, materials or supplies shall be delivered to the Town and title of all such equipment, materials or supplies shall pass to the Town upon delivery. Additional explanation of the services, equipment, materials and supplies to be supplied to the Town under this Comprehensive Grant Agreement is set forth in Schedule A as attached hereto.

During the term of this Comprehensive Grant Agreement the Company, at its expense, shall maintain and repair all items provided to the Town under this Comprehensive Grant Agreement. If an item cannot be repaired and is

no longer capable of performing its intended function, the Company, at its expense, shall replace said item with one of a like kind, which is capable of performing the intended function of the original item provided to the Town.

6. Term of Comprehensive Grant Agreement: This agreement shall remain in effect until such time as: 1) Pilgrim station is decommissioned; or 2) the Company no longer holds the NRC license to operate Pilgrim Station; provided however, that if the Company assigns or transfers its license to operate Pilgrim Station, it also shall assign this Comprehensive Grant Agreement to the succeeding holder of said operating license; or 3) the Town is no longer actively participating in the preparation, revision or implementation of the Town's plan to respond to a radiological emergency at Pilgrim Station.
7. Rights Not Impaired: No delay, oversight or omission of either the Company or the Town in exercising any right available under this Comprehensive Grant Agreement shall impair any such right or constitute a waiver of any of their rights, or in acquiescence therein.
8. Severability: The invalidity of any section, subsection, clause or provision of this Comprehensive Grant Agreement shall not affect the validity of the remaining sections, subsections, clauses or provisions hereof.
9. Amendment of Grant Agreement: This Comprehensive Grant Agreement, or any part hereof, may be amended from time to time hereafter only in writing executed by both parties.

10. Disclaimer of Responsibilities: The Town acknowledges that the obligation of the Company is limited to providing grant funds, materials, services, supplies or equipment in the manner and on the terms set forth in this Comprehensive Grant Agreement. Nothing in this Comprehensive Grant Agreement, nor any act of either the Company or the Town, shall be deemed or construed by either of them, or by third persons, (1) to create any relationship whatsoever involving the Company (including, but not limited to, employment, agency or contractor relationships between the Company and an employee or authorized representative of the Town) or (2) except as provided in Section 1 above, to create any rights on the part of the Town or any third person with respect to the Company or its property. Further, it is acknowledged by both parties that the Town's acceptance of funds under this Comprehensive Grant Agreement shall in no way be construed, in and of itself, as an endorsement or approval of any plan for responding to a radiological emergency at Pilgrim Station or of any other aspect of the operation of Pilgrim Station.
11. Waiver: No act or failure to act by either party shall be deemed as a waiver of said party's rights and obligations under this Comprehensive Grant Agreement unless the same be in writing, signed by the said party and expressly stated to constitute such waiver.
12. Notices: All amendments, notices, requests, objections, waivers, rejections, agreements, approvals, disclosures and consents of any kind made pursuant to this Comprehensive Grant Agreement shall be in writing. Any such communication shall be deemed effective for all purposes as of the date such communication is delivered to the office of the addressee

by hand or by certified mail return receipt requested, addressed as follows:

(i) For the Town

Board of Selectmen
Town Hall
Duxbury, Massachusetts 02332

(ii) For the Company

Senior Vice President-Nuclear
Boston Edison Company
800 Boylston Street
Boston, Massachusetts 02199

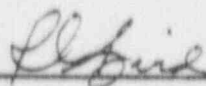
13. Effective Date: This Comprehensive Grant Agreement shall be deemed to have been accepted, and shall become effective, as of the date this Comprehensive Grant Agreement is executed and dated by the Town.
14. Opinion of Counsel: Upon the execution of this Comprehensive Grant Agreement by the Town, the Town shall deliver to the Company an opinion of counsel stating that: 1) it is within the corporate power of the Town to enter into and execute this Comprehensive Grant Agreement; 2) all the proper and necessary actions have been taken to authorize the signing and delivery of the Grant Agreement by the Town; and 3) when accepted by the Town, the Comprehensive Grant Agreement will become a valid and binding agreement of the Town. The Company upon execution of the Comprehensive Grant Agreement shall give a similar opinion of counsel if requested by the Town.

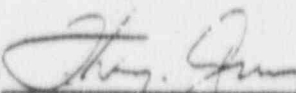
15. Entire Agreement: This Comprehensive Grant Agreement constitutes the entire agreement between the parties hereto and supersedes all prior oral or written agreements between the parties hereto with respect to the subject grant.

IN WITNESS WHEREOF, the undersigned hereunto set their respective hands this 15th day of July, 1988.

BOSTON EDISON COMPANY

THE TOWN OF DUXBURY

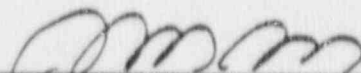
By 

By 
Thomas J. Groux

Its Sr. Vice President Nuclear

Its Town Manager

Approved as to form


Robert S. Troy, Esquire
Town Counsel

Item No. Tr-A14-13:

"Busing of the school population was not adequately tested and buses were not staged at the Alert level... Future exercises should demonstrate the capability of this objective."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process.

Boston Edison Response:

This is a comment on the October 1989 exercise made by Duxbury officials. It pertains to Objective 19, implementation of protective actions for school children.

The level of demonstration to satisfy each objective, including Objective 19, was determined by an Exercise Design Team composed of representatives from the MCDA, MDPH, FEMA, NRC and Boston Edison. Agreement on the extent of play for bus transportation was approved by each of these agencies before the scenario was developed. At that time a decision was made to minimize the number of buses dispatched so as to not impact bus provider schedules and disrupt normal school activities. The Scenario itself was submitted to FEMA by the Commonwealth for approval prior to the exercise.

During the course of the exercise, actual transportation needs were developed by school officials. The Commonwealth demonstrated its ability to coordinate resource support by calling providers to determine availability. Thirteen buses were mobilized for school facilities throughout the EPZ.

FEMA's Final Exercise Assessment found this objective to be satisfactorily met.

Issue No. Tr-A14-13: (cont.)

In regard to the comment that buses were not staged at the Alert classification per procedures, this was an exercise simulation issue. Buses were dispatched at the Alert in accordance with procedures. However, a Site Area Emergency was declared before the buses arrived at some schools. This was due to the compressed timeline which is necessary to accomplish the elements of an exercise in one day.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-14:

'1. There are decided problems in the [school] telephone system. [W]e need portable radios...."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process, attachment 5 - Statement on October 12 Pilgrim Evacuation Drill by Duxbury Office of School Superintendent.

Boston Edison Response:

After the exercise, Boston Edison cooperated with Duxbury school officials to identify an effective communications system as a backup to commercial telephones. Earlier this year a network of Citizen's Band (CB) portable radios was provided for each school building along with two radio base stations. Effectiveness of the radios was tested and confirmed.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A14-15:

"As of October 18, there is no completed IP for the [Pilgrim Area Collaborative]."

Source: Transcript Attachment 14. Letter from David J. Vogler (Chairman, Office of Selectmen, Duxbury, MA) to Thomas T. Martin (NRC Region I Administrator) re: Duxbury view on the off-site emergency preparedness process.

Boston Edison Response:

The Pilgrim Area Collaborative (PAC) is a private non-profit educational program for special needs children. For a short period of time between August and October 1989, there were no procedures for these children because the Duxbury School district chose to delete references to assisting this group from their existing procedure. Since that time Boston Edison has worked with the Duxbury School District and the Collaborative to ensure that procedures exist which fully integrate this group into the emergency preparedness program. Besides incorporating PAC into the Duxbury School procedure see Town of Duxbury IP-06 (Draft-9, September 21, 1990), entitled "School Departments", a procedure has been drafted specifically for PAC and is under review by the Program Director. See Pilgrim Area Collaborative Draft-2, July 24, 1990.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A15-1:

"On Oct. 8, 1989 it was determined that the Host School BECO had named for Duxbury were totally unaware of this designation and totally unwilling to participate."

Source: Transcript Attachment 15. Letter from Jane A. Fleming to A. Randy Blough and T. T. Martin (NRC Region I) re: written testimony for the public meeting concerning previous allegation.

Boston Edison Response:

It is the Commonwealth of Massachusetts and not Boston Edison who designates host schools. There was a period of time during development of initial draft procedures when names of potential host schools were inserted for Commonwealth consideration. These schools were eventually eliminated from consideration and were never contacted.

Prior to the October 1989 exercise, the Commonwealth was aware of the host school they could use and they had the capability to implement this aspect of the plan through use of an Executive Order. However, during the exercise, the Commonwealth failed to fill in the blanks on the Executive Order with the names of the host schools and FEMA identified this as an area requiring corrective action.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-1:

"As described in the draft exercise report, two deficiencies and two ARCA's were observed by FEMA at the state EOC. The deficiencies and one ARCA were corrected in the May 25th remedial exercise (see Attachment 2). The remaining ARCA will be corrected by incorporating a Recovery Issues component into the 1990 annual training program for state EOC personnel. In addition, recovery procedures are currently being added to all positions that require them."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989", p. 4.

Boston Edison Response:

See Response to Item Ex-47.

Currently, the Commonwealth has a Recovery Plan. Nevertheless, Boston Edison will support the Commonwealth to enhance their program by adding recovery procedures to "all positions that require them".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-2:

"Of the three ARFIs received by Area II for the October exercise, one was corrected during the remedial exercise and a second was corrected through revision to procedures. The third ARFI, related to the out-of-sequence demonstration of a Massachusetts State Police access control point, has been disputed by the Area II Director and is more fully described in his report in the appendix."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989", p. 4.

Boston Edison Response:

See Response to Item Ex-37.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

DRAFT 2

Item No. Tr-A28-3:

"MCDA does not feel that the operational capability of the Massachusetts Department of Public Works (MDPW) Wellesley reception center existed at the time of the exercise and, as requested in our extent-of-play document submitted to FEMA on October 5, 1989, we suggested that a full-scale demonstration of the reception center be evaluated on or before the next biennial exercise."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989", p. 5.

Boston Edison Response:

The October 1989 exercise demonstrated the monitoring and decontamination functions of the Wellesley Reception Center. At that time, construction and equipping of the Emergency Operations Center at the facility was not completed. Now that the Emergency Operations Center is complete, it may also be tested in a manner similar to that which occurred in October for the other two reception community EOCs in Taunton and Bridgewater. Boston Edison would support an evaluation of the Wellesley reception center "on or before the next biennial exercise".

CORRECTIVE ACTIONS:

Support the Commonwealth's efforts to conduct a demonstration of Wellesley Reception Center's capabilities.

SCHEDULE FOR COMPLETION:

To be determined, but no later than 8/91.

Item No. Tr-A28-4:

"1. Intelligence Section - develop IP's for position at Area and State."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

This is the first of several recommendations made by MCDA's Remedial Planning Group after the May 1990 remedial exercise. Although not integral to the response effort, since the time of the above cited memo, Boston Edison has cooperated with MCDA Area II in the development of this IP and lesson plan, and is currently incorporating final comments received by MCDA/NSEPP on August 30, 1990. See IP-10 (Draft-1, August 30, 1990), entitled "MCDA Area II Intelligence Officer".

It should be noted that this position at the Commonwealth/Framingham facility existed prior to the May 1990 remedial exercise. Revisions have been made and submitted to MCDA for review, IP-10 (Draft-3, September 21, 1990), entitled "Intelligence Officer".

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-5:

"2. State Plan - incorporate changes and supporting IP's."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

This second recommendation of MCDA's Remedial Planning Group is somewhat vague. We assume the recommendation relates to formally incorporating draft plan and procedure changes that were generated for the remedial demonstration.

In the past, revisions to the State Plan have been the sole responsibility of MCDA Headquarters. However, Boston Edison is available to assist MCDA in plan revisions, if requested. It is our understanding that most of the plan revisions drafted for the May 1990 remedial exercise have been incorporated into the Commonwealth's 1990 annual revision.

Boston Edison has assisted MCDA with implementing procedure development and revision. Procedure revisions for the remedial demonstration have been incorporated in the appropriate procedures. The following procedures have been revised:

IP-01 (Draft-06, July 9, 1990) "MCDA Director"

IP-03 (Draft-06, August 9, 1990) "MCDA Operations Officer"

IP-08 (Draft-05, August 27, 1990) "MCDA Communications Officer"

IP-12 (Draft-04, May 14, 1990) "MCDA Public Affairs Officer"

IP-18 (Draft-03, August 27, 1990) "MCDA Technical Hazards Officer"

See the attached transmittal letters for references to additional procedure revisions that have been submitted to MCDA for review.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable



BOSTON EDISON

Emergency Preparedness Department
59 Industrial Park Road
Plymouth, Massachusetts 02360

October 2, 1990
EP90-0577

Mr. Robert Boulay, Director
Massachusetts Civil Defense Agency
and Office of Emergency Preparedness
400 Worcester Road, Box 1496
Framingham, MA 01701-0317

Attn: Garry Meister

Dear Mr. Boulay:

We are submitting the following MCDA Headquarter's Emergency Response Implementing Procedures (IP) and Lesson Plans (LP) for MCDA's review and comment.

IP-02	MCDA Deputy Director
IP-10	MCDA Intelligence Officer
IP-17	MCDA Rumor Control Officer
LP 36-2S	MCDA Deputy Director
LP 36-10S	MCDA Intelligence Officer
LP 36-17S	MCDA Rumor Control Officer

Please direct any questions or comments to Richard E. Finn, Training Coordinator, Offsite Emergency Preparedness.

Sincerely,

Ronald A. Varley
Manager, Emergency Preparedness

LP/jlm
EOF3438

Attachment

cc: E. S. Fratto, MCDA Framingham
G. Meister, MCDA Framingham
A. Slaney, MCDA Area II Bridgewater
File 7.1.3

BOSTON EDISON
Emergency Preparedness Department
59 Industrial Park Road
Plymouth, Massachusetts 02360

September 19, 1990
EP90-0650

Mr. Robert Boulay, Director
Massachusetts Civil Defense Agency
and Office of Emergency Preparedness
400 Worcester Road, Box 1496
Framingham, MA 01701-0317

Attn: Gerry Meister

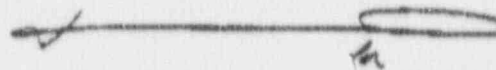
Dear Mr. Boulay:

We are submitting the following MCDA Headquarter's Emergency Response Implementing Procedures (IP) and Lesson Plans (LP) for MCDA's review and comment.

IP-04	MCDA Administrative Support Officer
IP-09	MCDA Message Control
IP-15	MCDA Plume Plotting
IP-16	MCDA Posting
LP36-4S	MCDA Administrative Support Officer
LP36-9S	MCDA Message Control
LP36-15S	MCDA Plume Plotting
LP36-16S	MCDA Posting Personnel

Please direct any questions or comments to Richard E. Finn, Training Coordinator, Offsite Emergency Preparedness.

Sincerely,



Ronald A. Var.
Manager, Emergency Preparedness

LP/jlm
EOF3438

Attachment

cc: E. S. Fratto, MCDA Framingham
G. Meister, MCDA Framingham
A. Slaney, MCDA Area II Bridgewater
File 7.1.3

Laura**BOSTON EDISON**

Emergency Preparedness Department
89 Industrial Park Road
Plymouth, Massachusetts 02360

September 13, 1990
EP90-0637

Mr. Robert Boulay, Director
Massachusetts Civil Defense Agency
and Office of Emergency Preparedness
400 Worcester Road, Box 1496
Framingham, MA 01701-0317

Attn: Gerry Meister

Dear Mr. Boulay:

We are submitting the following MCDA Headquarter's Emergency Response Implementing Procedures (IP) and Lesson Plans for MCDA's review and comment.

IP-05	MCDA Journal Officer
IP-06	MCDA Supply Officer
LP36-5S	MCDA Journal Officer
LP36-6S	MCDA Supply Officer

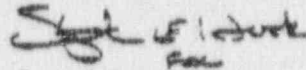
As previously agreed, we are forwarding the following revised IPs with the corresponding Lesson Plans for the final submittal.

IP-03	MCDA Operations Officer
IP-07	MCDA Security Guard
IP-08	MCDA Communications Officer
IP-18	MCDA Technical Hazards Officer
LP36-3S	MCDA Operations Officer
LP36-7S	MCDA Security Guard
LP36-8S	MCDA Communications Officer
LP36-18S	MCDA Technical Hazards Officer

Page 2

Please direct any questions or comments to Richard E. Finn, Training Coordinator, Office Emergency Preparedness.

Sincerely,



Ronald A. Varley
Manager, Emergency Preparedness

LP/jlm
EOF3423

Attachment

cc: E. S. Fratto, MCOA Framingham
G. Melster, MCOA Framingham
A. Stanley, MCOA Area II Bridgewater
File 7.1.3

Item No. Tr-A28-6:

"3. State EOC - duplicate charts located in Area 2 EOC."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 1-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

This recommendation of MCDA's Remedial Planning Group suggests that the same maps and status boards located in the Area II EOC be provided for the State EOC in Framingham.

Boston Edison disagrees with this recommendation based on the different functions these two locations serve. Area II provides direct communications and resource support to the plume EPZ, and reception communities and serves as an alternate EOC. For this reason, the maps at Area II are town-specific. Status Boards are designed to track information unique to the Towns and Area II's support for them.

The MCDA Framingham EOC serves an overall coordination, direction and control function. Its personnel interface primarily with other state and federal offices. Therefore, maps and status boards similar to Area II would be of little use.

This has not been identified by FEMA as an inadequacy in an exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-7:

"4. Memory Telephone Dialers - State EOC (2 Operations, 2 EBS)."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

Boston Edison has already provided two programmable fax machines to allow for automatic dialing of the EBS stations in order to fax EBS messages. We are not aware of any special circumstances in the MCDA Emergency Operations Center that dictates the need for Memory Telephone Dialers. No planning or exercise inadequacy has been identified by FEMA in the area of notification or activation of personnel by MCDA.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-8:

"5. Public Information items:

- a. Shorten messages
- b. Fax test messages"

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

This recommendation of MCDA's Remedial Planning Group pertains, we believe, to the length of the EBS messages and the mechanism used to transmit hardcopy to the Towns. Neither of these recommendations relate to an alleged planning inadequacy.

Boston Edison planners are working with MCDA planning staff to review procedures and incorporate changes and comments. These messages will be reviewed for content and length, ensuring that all pertinent information is conveyed in the most succinct, yet effective manner. A sample fax test message has been developed by the MCDA for incorporation within the next revision to the plan and implementing procedures.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-9:

"7. State EOC DNN Link - DNN voice should be send and receive: direct access by State Director to BECO Recovery Manager/EOF is essential (a dedicated line should be established if DNN unavailable for modification)."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

Boston Edison had discussed this item at length with the Commonwealth prior to the remedial exercise. Boston Edison does not intend to make a modification to the DNN system which might compromise its availability for Pilgrim to accomplish prompt dissemination of emergency classification notifications to offsite authorities. Existing plans and procedures do not reflect the MCDA Director and Boston Edison Emergency Director/Recovery Manager interfacing directly. Instead, representatives from MCDA and MDPH are present during an emergency at the EOF. See IP-02 (Draft-3, July 16, 1990), entitled "MCDA Deputy Director". This provides for face to face communication between individuals and the Emergency Director/Recovery Manager. Nonetheless, the MCDA Director has the capability of contacting the Boston Edison Emergency Director/Recovery Manager through several existing communications channels. They include two commercial telephone lines (one Boston telephone exchange and one Plymouth); BECONS radio; and the State Civil Defense radio frequency.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-10:

"8. BECONS - MCDA should test this system at least monthly."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

The BECONS radio system provides backup communications to Boston Edison's Digital Notification Network (DNN) system and also serves as a primary communications network for the Commonwealth and towns. The Area II and local community plans provide for monthly testing of the BECONS radio and we support MCDA Framingham coordinating a monthly test of the system for all offsite authorities. In addition, Boston Edison conducts its own monthly test of this system.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-11:

"9. Wellesley Procedures Notification - DNN drop should be installed at DPW Boston Radio Dispatch with switch to transfer to Wellesley Reception Center upon activation. Up-date/Streamline all Wellesley notification procedures."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - memo from J. Meister to R. J. Boulay re: Remedial Planning Group Final Report (May 29, 1990).

Boston Edison Response:

The Digital Notification Network (DNN) is a dedicated telephone communications system between Boston Edison, the Commonwealth, and EPZ reception towns. A (DNN) drop is currently in place at the MDPW Wellesley Reception Center and the MCDA Framingham 24-hour notification point. Procedures are in place that provide for full and prompt notification of emergency personnel staffing Wellesley Reception Center. See MCDA IP-07 (Draft-04, August 27, 1990), entitled "Security Guard"; MCDA IP-03 (Draft-6, August 9, 1990), entitled "Operations Officer"; and Wellesley DPW IP-23 (Draft-1, June 26, 1990) "MDPW Dispatcher". No justifiable reason for a change in the current system has been identified.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-12:

"I have one major comment that I would like presented to FEMA. FEMA's Exercise Evaluation Methodology (EEM) is structured so that objectives are evaluated based upon the activities of an organization. This EEM process proved not to be objective at Area II. In my opinion some evaluations were made of Area II that we had no control of such as timing sequences.

The evaluation of State and Area II performance should be kept separate."

Source: Transcript Attachment 26. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - letter from T. P. Rodger (Area II) to R. J. Boulay (MCDA) (June 19, 1990).

Boston Edison Response:

This item is related to FEMA's Exercise Evaluation Methodology. It is not an emergency planning program item related to Pilgrim.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-13:

"Area II Director Comment: The Town of Plymouth plans and procedures should reflect advising MCDA Area II/MCDA Headquarters offices of the independent activation of sirens of Clark's Island and Saquish-Gurnet. This local information could be vital in directing, coordinating and controlling future state emergency activities."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - letter from T. P. Rodger (Area II) to R. J. Boulay (MCDA) (February 15, 1990).

Boston Edison Response:

This letter is Mr. Rodger's response to the FEMA draft exercise report. This recommendation was incorporated into the Area II and Plymouth plans and procedures and successfully demonstrated in the May 1990 remedial exercise. See Town of Plymouth IP-02 (Draft-9, February 16, 1990), entitled "Civil Defense Agency" p. 6; Area II IP-02 (Draft-03, July 23, 1990), entitled "Operations Officer" p. 5.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-14:

"Page 2, Item A, FEMA States, cont'd: At 1020 Area II informed the plume EPZ towns that the 1010 siren activation applied to Plymouth only and the remaining EPZ towns were to disregard the siren activation order. Due to lack of appropriate record-keeping at the State and Area II EOC, it is not possible to verify the originator of the message to disregard the 1010 siren activation.

Area II Response: Area II transmitted original message to all communities as relayed from MCDA State EOC. "Plymouth only" message was transmitted upon direction by Area II Acting Director (First Shift) John Pappas on advice of NSEPP Planner Al Slaney for the sole purpose of clarification."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - letter from T. P. Rodger (Area II) to R. J. Boulay (MCDA) (February 15, 1990).

Boston Edison Response:

This letter is Mr. Rodger's response to the FEMA draft exercise report as it relates to MCDA Area II activities. It is related to siren activation and notification procedures. The process in place during the October 1989 exercise has undergone significant revision improving its effectiveness.

This process was successfully demonstrated during the May 1990 remedial exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-15:

"Page 6, Item A, FEMA States: No hard copies of EBS messages were provided to EPZ towns during the exercise. Provision of the hard copy would have helped eliminate the type of confusion that occurred with the 1105 message.

Area II Response: MCDA Area II did not receive a copy of the EBS messages either."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Power Plant, Plymouth, Massachusetts October 12-13, 1989" - letter from T. P. Rodger (Area II) to R. J. Boulay (MCDA) (February 15, 1990).

Boston Edison Response:

This letter is Mr. Rodger's response to the FEMA draft exercise report as it relates to MCDA Area II activities. This item was resolved by the May 1990 remedial exercise. Corrective actions taken prior to the remedial exercise included providing two Xerox Model 7021 facsimile machines to the MCDA Framingham EOC (with speed dialing and broadcast capabilities); revising plans and procedures to reflect distribution of hardcopy EBS messages from the Framingham EOC to town EOC's; training of MCDA personnel; and successfully demonstrating this process during the remedial exercise.

Procedures at the time of the exercise accurately reflected that the MCDA Framingham Public Affairs Officer, MCDA IP-12 (Draft-2, September 12, 1989), entitled "MCDA Public Affairs Officer", called for the provision of hardcopy of EBS messages to MCDA Area II via facsimile machine. This was not performed in accordance with procedures.

This item was resolved by the May 1990 remedial exercise.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

Item No. Tr-A28-16:

"1. Page 49:

We disagree with this comment since the NIAT field monitoring teams use the MCDA radios as backup and clearly demonstrated that this line of communication was implemented and in fact further demonstrated communication by commercial telephone."

Source: Transcript Attachment 28. Massachusetts Civil Defense Agency Report on the Draft "Final Exercise Assessment Joint State and Local Radiological Emergency Response Exercise for the Pilgrim Nuclear Power Plant, Plymouth, Massachusetts October 12-13, 1989" - letter from R. M. Hallisey (MDPH) to R. J. Boulay (MCDA) (July 3, 1990).

Boston Edison Response:

In this response to FEMA's draft exercise report, as it pertains to the Massachusetts Department of Public Health, Mr. Hallisey explains MDPH communications capabilities. As a result of the clarification, FEMA eliminated the comment from the final report.

CORRECTIVE ACTIONS:

None Required

SCHEDULE FOR COMPLETION:

Not Applicable

IV. RESPONSES TO EXERCISE REPORT ITEMS

Item No. Ex-1

"Although it was not required to be demonstrated by the Media Center under the extent of play, all State and local representatives at the Media Center should have dosimetry. The Media Center is located in Memorial Hall, the same building as the Plymouth EOC."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: Media Center

Boston Edison Response:

State and local PIO's, by procedure (e.g., Town of Kingston IP-21 (Draft-3, August 28, 1989), entitled "Public Information" report to their applicable EOC to pick up dosimetry prior to departing to the Media Center. IP-21, p. 4, Step 3, says "Report to the Kingston Emergency Operations Center (EOC)." Step 3e says, "Report to the Radiological Officer for dosimetry packet."

Based upon our review of exercise photographs, we were able to determine that most, if not all, State and local Representatives did, in fact, follow this procedure and wore dosimetry at the Media Center during the exercise.

Corrective Actions:

None required.

Schedule For Completion

Not applicable.

Item No. Ex-2 "Plans and procedures for airborne monitoring and buoy channel marker maps have not been developed for the Plymouth Harbor."

Source: FEMA 1989 Exercise Report, p. 40

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 8)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

According to the FEMA Report, "As an ad hoc measure, the NA-7 team was directed to take an air sample in the Plymouth Harbor using a boat provided by the Harbor Master."

"Recommendation: If this is to become standard practice, then plans, procedures and buoy channel marker maps must be developed."

This was an ad hoc activity conducted during the exercise. We have discussed this with the current MDPH Director of Radiation Control and the Commonwealth has no current plans to formalize this process into existing plans/procedures.

Corrective Actions:

None required.

Schedule For Completion

Not applicable.

Item No. Ex-3 "The process for obtaining measurements and air samples over water was excellent, and should be incorporated into the plan."

Source: FEMA 1989 Exercise Report, p. 42

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 10)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

According to the FEMA Report, "The field team demonstrated obtaining measurements and air samples while in the Plymouth Harbor and communicated the results to their EETC via the Harbor Master (see page 48), who plotted the plume's progress. This was a very effective ad hoc action enabling the State field teams to properly define the plume."

As FEMA noted, this was indeed an ad hoc activity which was performed effectively and there are no plans to add this to existing plans/procedures.

Corrective Actions:

None required.

Schedule For Completion

Not applicable.

Item No. Ex-4 "The host facility for the Beverly Manor Nursing Home in Plymouth did not have sufficient room to accommodate all evacuees."

Source: FEMA 1989 Exercise Report, p. 61

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 18)

Jurisdiction Involved: Plymouth

Boston Edison Response:

There are no requirements for pre-planned one to one designation of host beds to EPZ patients. Designations of one or more host facilities for each EPZ facility is the method of planning for nursing home residents in Plymouth and the other EPZ towns. In addition, procedures (see references below) are in place for locating additional facilities at the time of the event when the pre-designated facilities become full or are unavailable.

The host facility for Beverly Manor Nursing Home provides similar services and is owned by a company with numerous other nursing homes within the area outside of the EPZ. During an emergency, the Area II Special Facilities Coordinator and Transportation Officer, in conjunction with the Plymouth Health and Transportation Officers, will find other facilities available for any EPZ facility requiring assistance in identifying additional space.

See: Area II IP-08 (Draft-4, September 28, 1989), entitled "Special Facilities Coordinator" pp. 3, 5, and 7.

Town of Plymouth IP-07 (Draft-4, June 30, 1989), entitled "Board of Health" pp. 2-4.

Town of Plymouth IP-09 (Draft-6, June 30, 1989), entitled "Transportation".

Area II IP-04 (Draft-2, September 25, 1989), entitled "Transportation Officer".

Item No. Ex-4: (Cont.)

Corrective Actions:

The host facility for Beverly Manor Nursing Home will be reevaluated to confirm adequacy and if necessary, an additional host facility(s) will be designated.

Schedule For Completion

November 1990

Item No. Ex-5 "Plymouth South High School contains a day care facility which was not included in the transportation needs list."

Source: FEMA 1989 Exercise Report, p. 67

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Plymouth

Boston Edison Response:

The day care center (Eagle's Nest Child Care Center) has been referenced and included in the Transportation Needs Worksheet and School Status Sheet (Attachments 4(P) and 4(CO)) in Town of Plymouth IP-06 (Draft-5, June 15, 1990), entitled "Plymouth Public Schools and Plymouth-Carver Regional School District".

Details regarding the status of all Plymouth school procedures is contained in the Response to Item Tr-29.

Corrective Actions:

None required.

Schedule For Completion

Not applicable.

Item No. Ex-6 "Due to the inability at MCDA Area II to find the correct phone number for the Medieros Bus Company, there was a significant delay in ordering the dispatch of buses."

Source: FEMA 1989 Exercise Report, p. 67

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: MCDA Area II

Boston Edison Response:

A typographical error in the telephone number for Medieros Bus Company in the Transportation Officers Implementing Procedure (IP) was the source of the delay. This was not a generic issue but related to the Medieros Bus Company only. Contact numbers for transportation providers have since been reconfirmed in the Area II telephone checklist. See Area II IP-04 (Draft-2, September 25, 1989), entitled "Transportation Officer" Attachment 1-Transportation Resource List.

Corrective Actions:

None required.

Schedule For Completion

Not Applicable.

Item No. Ex-7 "At the Wellesley Reception Center the procedure for referring evacuees to mass-care facilities and tracking of referrals was not demonstrated. The State has not identified appropriate locations for congregate care centers."

Source: FEMA 1989 Exercise Report, p. 73

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

This was not part of the agreed upon extent of play for the Wellesley Reception Center. However, the Commonwealth is working with the American Red Cross (ARC) to locate and designate appropriate congregate care centers (CCCs) for the Wellesley Reception Center.

The Commonwealth, in fact, does have existing letters of agreement with some facilities, however, due to the age of the agreements, some may need to be updated. In addition, the ARC has surveyed 12 facilities for use as CCCs for Wellesley and is working to obtain letters of agreement with these facilities. See also Item Tr-151.

Corrective Actions:

The evacuee referral process will be included as an objective at a future exercise.

Schedule For Completion

Not applicable.

Item No. Ex-8 "Using the exposure rate of 0.3 mr/hr as the determining point decontamination is too high an exposure rate."

Source: FEMA 1989 Exercise Report, p. 73

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: Wellesley, Taunton, Bridgewater, All EPZ Towns

Boston Edison Response:

Procedures for monitoring at the Emergency Worker Monitoring and Decontamination Stations (EWMDS) and Reception Centers have been revised to reflect decontamination threshold levels at 100 counts/minute above background (with the exception of the City of Taunton IP-22 (Draft-1, October 16, 1989), entitled "Monitoring and Decontamination" which is currently undergoing this revision). This is in accordance with the Commonwealth's policy as stated in a Massachusetts Department of Public Health (MDPH) January 12, 1990 letter, Bob Hallisey, Director (MDPH), Radiation Control Program, to Bob Boulay, Director, Massachusetts Civil Defense Agency (MCDA).

In fact, Town of Duxbury IP-22 (Draft-2, February 9, 1990), entitled "Emergency Worker Monitoring and Decontamination" states in Attachment 5, "Monitor Guide" that "Levels greater than 100 cpm above background require decontamination/isolation." IP-22 is representative of the applicable procedures.

Corrective Actions:

Boston Edison will work with the City of Taunton to revise the decontamination threshold levels to 100 counts/minute above background.

Schedule For Completion

October 1990.

Item No. Ex-9 "The referral of simulated evacuees to the Wellesley CCC could not be demonstrated due to the lack of State designated CCCs for the Wellesley Reception Center."

Source: FEMA 1989 Exercise Report, p. 75

Type of Finding: PI (PI, ARCA, or ARFI) (Objective 22)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

See Response to Item Ex-7.

Corrective Actions:

See Response to Item Ex-7.

Schedule For Completion

See Response to Item Ex-7.

Item No. Ex-10 "The Silver Lake TSA Manager never received the General Emergency notification from the radio operator and assumed that the General Emergency was declared when the evacuation message was received at 1302."

Source: FEMA 1989 Exercise Report, p. 18

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 1)

Jurisdiction Involved: Kingston

Boston Edison Response:

None.

Corrective Actions:

Training of all personnel at the Transportation Staging Areas (TSA) will emphasize the importance of bringing to the attention of the Manager, Emergency Classification Level (ECL) changes, Protective Action Directives (PADs), and other important developments and information. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to this response.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Ex-10

OFFICE MEMORANDUM

Boston Edison Company

To: R. Markovich

From: R. Finn *RF*

Record Type A4.08

Date: September 27, 1990

Dept. Doc. EP90-0673

Non-Safety Related

Subject: Exercise Findings for Training Emphasis

Distribution:

J. McDonough	B. Yetman	J. Leonardi
K. Sullivan	L. Pollock	R. Weber
E. Fisher	E. Hartnett	S. Blanchard
A. Wagner	L. Hook	S. Correa
S. Archambault	S. Petrocelli	T. Kelley
E. Fratto - MCDA	File 3.3	File 7.1.3
FEMA	File 9.2.1	File 12.4
Radiation Management Consultant (RMC)		

An analysis of the FEMA Final Exercise Assessment for the October 12-13, 1989 exercise, indicated that areas observed as Areas Requiring Corrective Action (ARCAs) can be addressed by placing emphasis on these areas during training. This also holds true for those areas which were Areas Recommended for Improvement (ARFIs).

My review of these ARCAs and ARFIs and comparison with the lesson plans involved assures me that the material is already in the lesson plans. However, attached you will find a list of affected LPs which are to have a copy of this memorandum attached as a reminder to trainers to place special emphasis on these areas during the course of class instruction.

RF/jlm
EOF3472

Attachment

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training.

Transportation Provider LP 12-1, 2, 3, 4, 5, 6,

Town Transportation Officer LP 12-1, 2, 3

EMS LP 9-1, 2, 3

Exercise Comments [FEMA Final Exercise Assessment]:

ARCA

Objective: 1 "The Silver Lake TSA Manager never received the General Emergency Notification from the radio operator and assumed that the General Emergency was declared when the evacuation message was received at 1302."

Emphasize: Bringing ECLs, PADs and important information to the attention of the TSA Manager.

ARCA

Objective: 2 "The Silver Lake TSA was delayed by one and a half hours in becoming operational due to the Kingston EOC's late notification of the TSA manager and his assistant."

Emphasize: Prompt notification by EOC staff of the TSA Manager.

ARCA

Objective: 18 "The bus driver for Kingston, driving the evacuation pick-up route, strayed off course for approximately 15 minutes because of improper map reading."

Emphasize: The reading of bus route maps.

ARCA

Objective: 23 "The ambulance crew did not follow appropriate procedures to prevent cross-contamination of the patient, the crew, and the interior of the ambulance. For example, the patient was improperly covered, the interior of the ambulance was not covered with a protective draping, and the crew moved about and touched the interior and exterior of the ambulance without removing or changing gloves."

Emphasize: Contamination Control Procedures

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 19 "The Marshfield Transportation Officer did not follow the plans and procedures when he called the transportation provider directly instead of coordinating his requirements with the Area II EOC."

Emphasize: Procedures for obtaining transportation

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Dosimetry LP 2-1
All Dosimetry Coordinator Lesson Plans

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 6 "Although a majority of the emergency workers throughout the EPZ have received dosimetry training, a few workers have not been trained in proper documentation procedure."

Emphasize: Dosimeter reading and documentation.

ARCA

Objective: 6 "The radiological officer at the Silver Lake Transportation Staging Area did not give proper instructions on the use of dosimetry to the drivers."

Emphasize: The use of personal dosimetry and documentation.

ARCA

Objective: 18 "A van driver in Kingston did not check or record dosimeter readings and a bus driver in Plymouth did not record dosimeter readings according to plans and procedures."

Emphasize: The use of personal dosimetry and documentation.

ARFI

Objective: 16 "The Fire Chief at the Carver EOC told his emergency workers to take KI even through the message regarding KI was not directed to Carver."

Emphasize: KI is to be administered/ingested only when the Commonwealth directs it.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Monitoring Decontamination LP 4-6
Registration Coordinator LP 1-04

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 21 "At the Wellesley Reception Center, on one occasion, an evacuee was told to remove the plastic booties before being monitored with the CDV-700 in order to locate an area of contamination. This could possibly result in the contamination of the area where the monitoring was being done."

Emphasize: Monitoring techniques and contamination control.

"ARFI

Objective: 21 "At the Wellesley Reception Center, upon completion of the three-part Registration Form, the third part should have been turned in to the Reunification Clerk for filing. This was not done."

Emphasize: Proper distribution of the Registration Form.

ARFI

Objective: 21 "At the Wellesley Reception Center there was no one to ensure that evacuees went to the registration desk after leaving the monitoring/decontamination area."

Emphasize: Instructing evacuees to proceed to the Registration Area.

ARFI

Objective: 23 "The radiological survey of the patient was not performed properly (e.g., probe closed when surveying victim's extremities, probe not covered to prevent contamination, probe coming into contact with contaminated source)."

Emphasize: Radiological Monitoring Techniques.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Dosimetry LP 2-1

Radiation Management Consultants (RMC) Hospital Training

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 24 "The Morton Hospital procedures were not followed in the REA when the floor covering was not taped securely at the doorways."

Emphasize: The process of taping down the floor coverings.

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 6 The Morton Hospital workers failed to properly annotate the appropriate form after zeroing-out their dosimeters."

Emphasize: Procedures for recording SRD readings.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Fire Chief EOC Representative LP 4-2
Fire Dispatcher LP 4-3
EWMDS LP 4-7
EOC Radio Operator LP 5-8

Exercise Comments [FEMA Final Exercise Assessment]:

ARCA

Objective: 2 "Activation of the Kingston EOC was delayed by more than half an hour since the Kingston Police Department failed to notify the Fire Department of the Alert. Thus, the Fire Department was delayed in activating the remaining staff by radio pagers."

Emphasize: Prompt notification of the Town Emergency Response Organization.

ARCA

Objective: 25 "At the Kingston EWMDS, staff members were not fully trained in the operation of the G-M meter."

Emphasize: Operation of monitoring equipment.

ARFI

Objective: 2 "The Fire Department representative did not arrive at the Bridgewater EOC until 1021, delaying full staffing.

Emphasize: Prompt reporting to and activating the EOC.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

American Red Cross LP 3-4
Radiological Officer LP 3-6
American Red Cross LP 3-7
Introduction to Schools LP 11-1
Health Officer LP 19-1

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 1 "The Bridgewater EOC did not post the correct time that the Alert ECL was declared."Emphasize: Prompt interpretation and posting of ECLs and times.

ARFI

Objective: 16 "The RO at the Plymouth EOC briefed nursing homes concerning KI even though the local plan indicates that the Public Health Officer should perform this function."Emphasize: Follow established procedures.

ARCA

Objective: 22 "Both the school principal and the ARC representative thought that they would be in charge of the Bridgewater CCC during school hours."Emphasize: Dual role of Bridgewater ccc/host school and separation of responsibilities.

ARCA

Objective: 16 "The Plymouth EOC staff never informed the Jordan Hospital of the message regarding issuance of KI."Emphasize: Notifying institutions of the need to administer KI.Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Introduction to Schools LP 11-1

Day Cares LP 14-1

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 19 "The New Testament School principal did not complete the transportation worksheet or relay transportation requirements to the Plymouth EOC."Emphasize: Completing the transportation worksheet and providing results to the EOC.

ARFI

Objective: 19 "In general, there was a lack of awareness at the host schools concerning the estimated time of EPZ student arrival and the numbers of students to expect. The information should be passed from the EPZ EOC to the host EOC then to the host facility."Emphasize: The importance of establishing this information flow to the host schools.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Public Affairs Officer LP 36-12

Exercise Comments [FEMA Final Exercise Assessment]:

ARCA

Objective: 33 "The message describing the restricted area drafted by the State during the recovery and reentry tabletop demonstration was unclear and incomplete. The information on the restricted area did not include the Plymouth Beach area and a small section of Rocky Hill Road near the plan site. In addition, the message did not explain to the public the difference between restricted and unrestricted areas, nor the procedure which would be in place to allow necessary emergency reentry to the restricted area."

Emphasize: Proper EBS message formulation.

Lesson Plans Affected:

The comments outlined below are covered in the following lesson plans and should be emphasized during training:

Intro to Media Center LP 20-1
Public Information Officer (EPZ Towns) LP 20-2
Public Information Officer (MCDA Framingham) LP 20-3

Exercise Comments [FEMA Final Exercise Assessment]:

ARFI

Objective: 14 "Not enough time was given to meaningful coordination of information among PIO's."

Emphasize: Allowing adequate time for coordination of information among the PIO's.

Item No. Ex-11 "The message transmitting the General Emergency ECL was received at the Area II EOC, but was not given promptly to the Area II Director."

Source: FEMA 1989 Exercise Report, p. 18

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 1)

Jurisdiction Involved: MCDA, Area II

Boston Edison Response:

The Area II EOC Digital Notification Network (DNN) operator did not promptly notify the Area II Director when the General Emergency ECL was received at 1218. Instruction has been provided to the DNN operator to immediately provide ECL notification to the Area II Director. While not an objective to be evaluated by FEMA during the remedial exercise, this activity was observed by exercise controllers to have been properly performed.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable.

Item No. Ex-12

"Activation of the Kingston EOC was delayed by more than half an hour since the Kingston Police Department failed to notify the Fire Department of the Alert. Thus the Fire Department was delayed in activating remaining staff by radio-pagers."

Source: FEMA 1989 Exercise Report, p. 21

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 2)

Jurisdiction Involved: Kingston

Boston Edison Response:

The Digital Notification Network (DNN) equipment has since been moved to the Fire Department.

Corrective Actions:

Fire Department personnel training will emphasize prompt notification of the Town Emergency Response Organization. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-13 "The Silver Lake TSA was delayed by one and a half hours in becoming operational due to the Kingston EOC's late notification of the TSA Manager and his assistant."

Source: FEMA 1989 Exercise Report, p. 21

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 2)

Jurisdiction Involved: Kingston

Boston Edison Response:

None.

Corrective Actions:

Training for the EOC staff will emphasize the importance of promptly notifying the TSA Manager and staff. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-14 "A map depicting the EPZ was not available in the Media Briefing Area at the Media Center."

Source: FEMA 1989 Exercise Report, p. 33

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 5)

Jurisdiction Involved: Media Center

Boston Edison Response:

As per the attached Media Center Surveillance Sheet, (Attachment F of EP Work Instruction, No. 11.0, Revision 0, dated August 31, 1989), EPZ maps were available in the Media Center.

Corrective Actions:

Boston Edison's Facility Activation Procedure for the Media Center will be modified to ensure that a 10 mile EPZ map is available for use in the Media Briefing Area.

This item will be scheduled as an objective in the next exercise.

Schedule For Completion

December 1990

MEDIA CENTER SURVEILLANCE

Instructions: (1) Report to the Media Center on a monthly basis. (2) Use this questionnaire to evaluate the facility layout while conducting surveillance. (3) Report discrepancies on Attachment J.

	YES	NO
1. Are the following Status Boards available?		
a. 5, 10, and 50 Mile Maps	<u> ✓ </u>	<u> </u>
b. Press Kits (35)	<u> ✓ </u>	<u> </u>
c. EAL Chart (1)	<u> ✓ </u>	<u> </u>
2. Are the following pieces of equipment present?		
a. Telecopier (3) 2	<u> ✓ </u>	<u> </u>
Send a test page from each Telecopier to the EOF (746-7036). Request test pages from the EOF to (747-1031, 1032, 1033).		
b. Photocopier(1)	<u> ✓ </u>	<u> </u>
Turn power on and copy test page.		
c. Typewriter (3)	<u> ✓ </u>	<u> </u>
d. Word processor(1)	<u> ✓ </u>	<u> </u>
Locate cabinet in back of closet. Remove and set-up word processor. Power up and locate a match press release. Printout press release. Power down, disconnect, and store word processor.		
e. Television Sets (3)	<u> ✓ </u>	<u> </u>
Set-up TV's, Turn on power, tune in channels 4, 5, and 7. Turn off and store.		
f. Public Address System	<u> ✓ </u>	<u> </u>
Turn on power, adjust volume, talk into Microphone.		
g. PNPS ERO ID Badges (15)	<u> ✓ </u>	<u> </u>

MEDIA CENTER SURVEILLANCE
Continued

YES NO

3. Is a controlled set of the following procedures available:

- a. PNPS Emergency Plan(1) ✓ ---
- b. Emergency Communications Instructions (1) ✓ ---
- c. FSAR (1) - *Controlled* N/A ---
- d. Recovery Procedures (3) - *Program discontinued* N/A ---
- e. ~~Emergency Notification List~~ (3) ✓ ---
ETD

Performed by: *Keith Dineen* Date 8-31-89

Reviewed by: *[Signature]* Date 9-7-89

Manager, Emergency Preparedness or Designee

Item No. Ex-15 "Only one slow speed copier was available for use by the State and five local PIOs resulting in delays in copying important news releases."

Source: FEMA 1989 Exercise Report, p. 33

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 5)

Jurisdiction Involved: Media Center

Boston Edison Response:

As per the attached Media Center Inventory, Attachment 6 of PNPS EP-AD-301, Revision 1, dated October 1, 1990, an additional copier has been provided in the Media Center for use by the State/Local PIOs.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable.

EX-15

MEDIA CENTER INVENTORY

Month/Year: OCT. 1990 Quarterly

Ensure that the following equipment/furniture is available and operational (see attached diagram for locations). Note any inventories below the minimum level or equipment that is non-operational in Comments Section.

LOCKERS/CABINETS/CLOSETS (Posted Inventories to Complete)

AREA	LOCATION	WHERE POSTED	COMPLETE
Cabinet A	BECo Workroom	Inside Door	✓
Cabinet B	Storage Room I	Inside Door	✓
Storage Room I	BECo Workroom	Inside Door	✓
Storage Room II	BECo Workroom	Inside Door	✓
Key Box	BECo Workroom (mounted)	Inside Box	✓
3rd Floor Closet (South)	3rd Floor	Inside Door	✓
3rd Floor Closet (North)	3rd Floor	Inside Door	✓
AV Equip. Locker #1	3rd Floor closet (South)	Inside Locker	✓
AV Equip. Cart	3rd Floor Closet (North)	Inside Locker	✓

BECo Workroom

1. Equipment

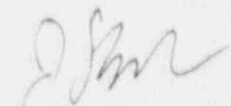
- Wang Computer Terminal with Modem, printer and necessary hook-up
- Copy Machine (with cart)
- Telecopier
- Digital Clock
- Single Line Telephone
- Speaker Telephone
- Telecopy Telephone

REQUIRED	INVENTORIED AMOUNT
1 each	1
2 each	2
2 each	2
1 each	1
14 each	14
1 each	1
2 each	2

2. Furniture

- Tables 2' x 4'
- Computer Desk
- Office Chairs
- Folding Chairs
- Wastebasket (plastic)
- Portable Double Sided Black Board

9 each	9
1 each	1
4 each	4
8 each	8
1 each	1
1 each	1

Reviewed 10-1-90


MEDIA CENTER INVENTORY (Cont.)

	<u>REQUIRED</u>	<u>INVENTORIED AMOUNT</u>
3. Miscellaneous		
EPZ Map 10 Mile (mounted)	1 each	/
Events Status Board (mounted)	1 each	/
Emergency Classification Level Sign (mounted)	1 each	/
Wall File Holder - Single (mounted)	3 each	3
Wall File Holder - Triple (mounted)	1 each	/
Key Box (Mounted)	1 each	/
4. Documents (In Storage Room 1)		
EP-IP Procedure Set	1 each	/
PNPS Plan	1 each	/
EP-PI Procedure set	1 each	/
PNPS Emergency Telephone Directory	2 each	2
BECo Workroom		
5. Emergency Position Manuals (In Storage Room 1)		
Company Spokesperson	1 each	/
Media Center Supervisor	1 each	/
Agency Coordinator	1 each	/
Technical Advisor - Operations	1 each	/
Technical Advisor - Health Physics	1 each	/
Media Relations Coordinator	1 each	/
Media Assistants	1 each	/
Audio Visual Assistant	1 each	/
Media Center Administration Coordinator	1 each	/
Media Center Word Processor	1 each	/
Media Center Communicator	1 each	/
Media Center Duplication	1 each	/
Media Center Distribution	1 each	/
Media Center Historian	1 each	/
Commonwealth/Federal Workroom		
12 hour clock (mounted)	1 each	/
Events Status Board (mounted)	1 each	/
Sign-In Status Board (mounted)	1 each	/

EX-15

MEDIA CENTER INVENTORY (Cont.)

	REQUIRED	INVENTORIED AMOUNT
Town Workroom		
Tables 2' x 4"	6 each	<u>6</u>
Folding Chairs	8 each	<u>8</u>
24 hour clock (mounted)	1 each	<u>1</u>
Events Status Board (mounted)	1 each	<u>1</u>
Sign-In Status Board (mounted)	1 each	<u>1</u>

Comments: _____

Inventory performed by: *Gene E. Corbett* Date: 10/1/90
 Inventory reviewed by: *JAN* Date: 10/1/90
 Facilities and Equipment Division Manager

Item No. Ex-16 "An inadequate number of typewriters was provide[d] for the five local PIOs which makes developing news releases very slow "

Source: FEMA 1989 Exercise Report, p. 33

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 5)

Jurisdiction Involved: Media Center

Boston Edison Response:

Four typewriters are available for use by the PIOs. (See attached posted Media Center Inventory Sheet for cabinet B at the Media Center dated October 1, 1990 that shows four typewriters).

Corrective Actions:

One additional typewriter will be provided for use by the PIOs.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

December 1990

EX-10

MEDIA CENTER CABINET B INVENTORY

Located In Storage Area I

<u>Item</u>		<u>Required Amount</u>	<u>Inventoried Amount</u>
Padlock with keys		1 each	<u>1</u>
Typewriter	Model/Make <u>IBM</u>	4 each	<u>4</u>
Television	Model/Make <u>1-SHARP 19F75</u> <u>2-PANASONIC CT-1123</u>	3 each	<u>3</u>
VCR	Model/Make <u>FISHER FM4000</u>	1 each	<u>1</u>
Cassette Player	Model/Make <u>Realistic CTR 41</u>	1 each	<u>1</u>
Cassette tapes		6 each	* <u>2 super DMR</u> <u>4 other</u> <u>0</u>
Marine I CB Radio	Model/Make <u>BEARCAT 220</u>	1 each	<u>1</u>
Telecopier	Model/Make <u>RICOH 200</u>	1 each	<u>1</u>
Overhead Projector	Model/Make <u>Bull 200</u>	1 each	<u>1</u>
A/V Projection lamp bulbs		2 each	<u>2</u>
Hammer		1 each	<u>1</u>
Screwdriver		3 each	<u>3</u>
Pliers		1 each	<u>1</u>
2 Ft. Extension Cord		1 each	<u>1</u>
Radio	Model/Make <u>Realistic 12-765A</u>	1 each	<u>1</u>
Tone Alert Radio	Model/Make <u>EAR</u>	1 each	<u>1</u>
10 ft. Extension Cord		2 each	<u>2</u> 1 <u>GP</u>

Reviewed 10-1-40
[Signature]

No changes to this inventory sheet may be made without approval of the Onsite Emergency Preparedness Section Manager

Approved by: *[Signature]*
Signature

Item No. Ex-17 "The Plymouth EOC has no security and once a person has been cleared to enter the Media Center, that person may also enter the adjoining Plymouth EOC."

Source: FEMA 1989 Exercise Report, p. 33

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 5)

Jurisdiction Involved: Plymouth

Boston Edison Response:

Town of Plymouth IP-03 (Draft-11, February 1, 1990), entitled "Police Department" calls for a Security Officer to be dispatched to restrict entry to the Plymouth EOC. The Officer was not present during the exercise.

Town of Plymouth IP-02 (Draft-9, February 16, 1990), entitled "Civil Defense Agency" has been revised (page 4, step 3, directs the Civil Defense Director to "Ensure EOC security is established") to ensure establishment of Security.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-18 "The radiological officer at the Silver Lake Transportation Staging Area did not give proper instructions on the use of dosimetry to the drivers."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: Kingston

Boston Edison Response:

The FEMA Report noted that although one radiological officer [Dosimetry Coordinator] did not give instructions, "The adequacy of State and local plans for control of emergency worker exposure was demonstrated." "Local control of emergency worker exposure was adequately demonstrated."

Corrective Actions:

Training for all emergency workers will continue to emphasize the importance and use of personal dosimetry. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-19 "The NIAT teams did not check their kits against an inventory list before leaving the EOF. One team did not have a dosimeter charger available."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

Inventory lists had been developed at the time of the exercise but were not in the kits.

Dosimeter chargers have now been placed in each Field Team kit.

See Response to Item Ex-21.

Corrective Actions:

Boston Edison will work with Massachusetts Department of Health to ensure that NIAT training emphasizes the need to inventory equipment before field deployment. See letter from R. Varley to R. Hallisey (October 4, 1990) re: Response to Exercise Findings attached to this response.

Schedule For Completion

Not applicable



BOSTON EDISON
Emergency Preparedness Department
59 Industrial Park Road
Plymouth, Massachusetts 02360

October 4, 1990
EP90-0687

Mr. Robert Hallisey, Director
Radiation Control Program
Massachusetts Department of Public Health
150 Tremont Street
Boston, MA 02111

Dear Mr. Hallisey:

My staff recently completed an assessment of FEMA's 1989 Graded Exercise report for Pilgrim Station. Below is a list of those items which relate to the radiological emergency response activities of the Massachusetts Department of Public Health.

Some of these findings are Areas Requiring Corrective Action (ARCAs) and some are Areas Requiring Further Improvement (ARFIs). As you know, ARCAs must be responded to, corrected, and demonstrated in the next FEMA evaluated exercise. ARFIs on the other hand are suggestions for consideration offered by FEMA and for the most part should be investigated and corrected, but need not be formally responded to.

The Boston Edison Emergency Preparedness Department staff will continue, as we have in the past, to support your agency in making improvements to the Offsite Program for Pilgrim Station.

The FEMA exercise items requiring our attention are as follows:

1. ARCA, Objective 6 - "The NIAT Teams did not check their kits against an inventory list before leaving the EOF. The team did not have a dosimeter charger available."

Suggested Actions:

- a. Develop an inventory list and add to the NIAT field monitoring kits - (this has already been completed by BECo)
 - b. Place dosimetry chargers in kits - (this has already been completed by BECo)
 - c. Emphasize during training, the need for NIAT members to inventory equipment before deployment
2. ARCA, Objective 7 - "The Monitoring Kits did not contain equipment specified in the NIAT handbook, including an inventory list."

Suggested Actions:

- a. Develop an inventory list and add it to kits - (this has already been completed by BECo)
 - b. Reconcile NIAT handbook list and the actual inventory of Boston Edison maintained kits.
3. ARCA, Objective 8 - "A fixed or reproducible geometry was not demonstrated by one NIAT field team while analyzing the air sample media in the field."

Suggested Actions:

- a. Add sample holders to the monitoring kits - (this has already been completed by BECo)
 - b. Emphasize in training the importance of a fixed/reproducible geometry.
4. ARFI, Objective 7 - "The monitoring team did not keep the probes on the instruments enclosed in thin plastic bags in order to minimize the possibility of contamination."

Suggested Actions:

- a. Include plastic bags in the kits - (this has already been completed by BECo)
 - b. Emphasize in training the use of plastic bags over the probes.
5. ARFI, Objective 8 - "One Monitoring Team did not properly complete the emergency environmental sample log, form D-4. Consequently, the sample volume of 12 feet was not included with the sample information."

Suggested Actions:

- a. Revise NIAT procedures to require the use of prescribed labels.
- b. Emphasize, in training the use of the prescribed labels.

These items, in order to be properly demonstrated, must be completed prior to the next graded exercise scheduled for August of 1991.

We are looking forward to working with you to address the above items and if you have any questions or comments, please contact me at (508) 747-9464.

Sincerely,



Ronald A. Varley
Manager, Emergency Preparedness

RW/jim
EOF3480

Item No. Ex-20 "Equipment kits at the Taunton Reception Center did not include a dosimeter charger."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: Taunton

Boston Edison Response:

Dosimeter chargers have been placed in the Equipment kits. The kits are stored at the EOC for distribution to the Reception Center at the time of the emergency.

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-21

"The monitoring kits did not contain equipment specified in the NIAT handbook, including an inventory list."

Source: FEMA 1989 Exercise Report, p. 37

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 7)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

The equipment in the field monitoring kits maintained by Boston Edison are not precisely the same as required by the NIAT handbook, however, they are equivalent as observed by FEMA. In the FEMA Report, "The equipment used," [although not the same as specified in the handbook,] was equivalent and adequate for conducting ambient radiological monitoring."

"The teams demonstrated proper techniques in conducting and recording field radiation measurements."

The field monitoring/sampling function was not affected. See Response to Item Ex-19.

Offsite monitoring kits have been inventoried and Boston Edison inventory lists have been added to each. (See attached sample list).

Corrective Actions:

Boston Edison will work with the Commonwealth to ensure that the NIAT handbook and actual inventory are reconciled. See letter from R. Varley to R. Hallisey (October 4, 1990) re: Response to Exercise Findings attached to Item Ex-19.

This will be scheduled as an objective for the next exercise.

Schedule For Completion:

Not applicable

RADIOLOGICAL GROUP

EX-21

EMERGENCY OPERATIONS FACILITY
(MDPH MONITORING KITS) (2)

- Instructions:
- (1) Report to the EOF on a monthly basis.
 - (2) Replace any instrument requiring calibration within the next 30 days.
 - (3) Check the expiration dates of shelf-life items if applicable.
 - (4) Check all batteries to ensure no leakage has occurred.
 - (5) If seal is broken or serial numbers do not match, perform inventory.
 - (6) Record summary of discrepancies on Form No. 5.8.2D-1.

Previous Month's Seal Serial Number: 3464 Month 11/89

Instrument Calibration and TLD change out Due: Date 12/89

22
22

ITEM	RECOM. ENDED QUANTITY	SERIAL NUMBER	CALIBRATION DUE DATE	SAT	UNSAT
RO-2A (or Equivalent)	1				
E-140 (or Equivalent)	1	87467	6/4/90	✓	
HP-210 Probe (or Equivalent)	2	217/447H	8/90/2/90	✓	
Radeco Air Sampler (Battery)	1				X
TLD'S	3	DATE REPLACED: 4/8/89		✓	
Pocket dosimeters 0-500 mr	3	NA	3/90	✓	
SH-2 Sample Holder	1	NA	NA	✓	
Smears and folders (boxes each)	1	NA	NA	✓	
Air sample filter paper (boxes)	2	NA	NA	✓	
Silver Zeolite Cartridges	25	NA	NA	✓	
Tape Measure 0-100 ft.	1	NA	NA	✓	
Stop Watch	1	NA	NA	✓	
Air sample labels (roll)	1	NA	NA	✓	
Plastic bags (small ziploc)	50	NA	NA	✓	
Flashlight	1	NA	NA	✓	
Batteries: D-cell	9	NA	NA	✓	
Spare Fuses (for Radeco)	4	NA	NA	✓	
RP Boundry tape (rolls)	1	NA	NA	✓	
Surgeon's Gloves (box)	1	NA	NA	✓	
Masking tape (2" rolls)	1	NA	NA	✓	

22

EMERGENCY OPERATIONS FACILITY
(MDPH MONITORING KIT) (2)

ITEM	RECOMMENDED QUANTITY	SERIAL NUMBER	CALIBRATION DUE DATE	SAT	UNSAT
Tweezers	1	NA	NA	✓	
Radeco Sampling Heads	3	NA	NA	✓	
BNC Cable for E-140	2	NA	NA	✓	
Paper pad	1	NA	NA	✓	
Clipboard	1	NA	NA	✓	
Bull Horn	1	NA	NA	✓	

New Locking Device Serial Number: 3464 (If Applicable)

This Audit Was Performed By: [Signature] Date 12/4/89

All deficiencies noted have been corrected or action has been taken to achieve corrected status., and completed form(s) has been forwarded to the Facilities and Equipment specialist.

[Signature]
H.P. Supervisor

12-5-89
Date

Action has been taken to correct deficiencies and completed form(s) forwarded to Records Management.

[Signature]
Manager, Emergency Preparedness or Designee

12/17/89
Date

Item No. Ex-22 "The silver zeolite cartridges provided in the equipment kits for the NIAT field teams were not enclosed in an air tight bag and were dated 1986."

Source: FEMA 1989 Exercise Report, p. 40

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 8)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

None

Corrective Actions:

The silver zeolite cartridges will be sealed and color coded (to differentiate between those to be used for drills and real events) in the kits.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

October 1990

Item No. Ex-23 "A fixed or reproducible geometry was not demonstrated by one NIAT field team while analyzing the air sample media in the field."

Source: FEMA 1989 Exercise Report, p. 40

Type of Finding: ARCA (PI, AKCA, or ARFI) (Objective 8)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

Sample holders have been included in all NIAT field team kits and included on the inventory list.

See Response to Item Ex-21.

Corrective Actions:

Boston Edison will work with the Commonwealth to ensure that training will emphasize the use of a fixed or reproducible geometry. See letter from R. Varley to R. Hallisey (October 4, 1990) re: Response to Exercise Findings attached to Item Ex-19.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-24 "The Area II 1117 message indicated that sirens were to be activated. The key Carver and Marshfield EOC officials did not recognize that the State expects all town sirens to be activated, even if the town is not included in the protective action, unless directed otherwise."

Source: FEMA 1989 Exercise Report, p. 45

Type of Finding: ARCA (PI, ARCA, or ARF) (Objective 12)

Jurisdiction Involved: Carver, Marshfield

Boston Edison Response:

Procedures (e.g. Town of Carver IP-02 (Draft-3, May 9, 1990), entitled "Civil Defense Agency" and Town of Carver IP-01 (Draft-3, February 8, 1990), entitled "Board of Selectmen") have been revised to clarify siren activation policy and process. While not an objective to be evaluated at the May 1990 remedial exercise, the activity was observed by exercise controllers to have been performed.

Corrective Actions:

This will be scheduled as an objective in the next exercise.

Schedule for Completion

Not applicable

Item No. Ex-25 "The Carver BECONS operator incorrectly transcribed the siren activation portion of the Area II message as applying only to Plymouth, Kingston, and Duxbury. This contributed to Carver's decision not to activate sirens."

Source: FEMA 1989 Exercise Report, p. 45

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 12)

Jurisdiction Involved: Carver

Boston Edison Response:

See Response to Item Ex-24.

Corrective Actions:

See Response to Item Ex-24.

Schedule For Completion

See Response to Item Ex-24.

Iter No. Ex-26 "The Executive Order used in the remedial exercise used incorrect information concerning the host facility for students from Marshfield."

Source: FEMA 1989 Exercise Report, p. 50

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 13)

Jurisdiction Involved: MCDA

Boston Edison Response:

To the best of Boston Edison's knowledge, the Executive Order did not contain incorrect information. As discussed in Response to Item Tr-5, efforts are underway to finalize permanent host facilities for Marshfield which will obviate the need for use of the Executive Order.

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-27 "PAR's were not given to the media in familiar geo-political boundaries."

Source: FEMA 1989 Exercise Report, p. 52

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 14)

Jurisdiction Involved: Media Center

Boston Edison Response:

Protective Action Directives (PADs) are by plan/procedures (see Pilgrim Evacuation Time Estimate Preliminary Activities, pp. 1-3, and Commonwealth of Massachusetts RERP (September 1990) pp. 7-15, 7-16, p. Ex 2-31) directed to and implemented by pre-arranged subareas. Subareas are a fundamental basis of the offsite planning process and are necessary to support recommendations for protective actions based on 2, 5, and 10 mile radii from the station. They were developed from familiar geo-political boundaries in order to be recognizable to the general public. Subarea descriptions and boundaries are included in the Public Information Brochure, placards, telephone books, and the offsite Media kits.

Further, the media are invited to become more familiar with offsite emergency planning (including the subarea concept) during the annual Media Orientation Day.

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-28 "The Duxbury EOC did not have sufficient KI for distribution to residents remaining within the local nursing homes."

Source: FEMA 1989 Exercise Report, p. 56

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 16)

Jurisdiction Involved: Duxbury

Boston Edison Response:

To the best of Boston Edison's knowledge, there was sufficient KI available at the EOC during the exercise.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-29 "The Plymouth EOC staff never informed the Jordan Hospital of the message regarding issuance of KI."

Source: FEMA 1989 Exercise Report, p. 56

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 16)

Jurisdiction Involved: Plymouth

Boston Edison Response:

None

Corrective Actions:

Training for the Radiological Officer and the Health Officer will emphasize the importance of notifying the applicable institutions of the need to administer KI. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-30 "KI was not stored at the Jordan Hospital."

Source: FEMA 1989 Exercise Report, p. 56

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 16)

Jurisdiction Involved: Plymouth

Boston Edison Response:

KI is not stored at Jordan Hospital but is distributed from the Plymouth EOC in accordance with Massachusetts Department of Public Health policy. See attached MDPH memo regarding State policy on use of KI (January 25, 1982) and Town of Plymouth IP-07 (Draft-4, June 30, 1989), entitled "Board of Health" pp. 2-3, step 4.

Corrective Actions:

None required

Schedule For Completion

Not applicable



Bailus Walker, Jr., Ph.D., M.P.H.
COMMISSIONER

Ex-30
Attachment 1
The Commonwealth of Massachusetts
Executive Office of Human Services
Department of Public Health

150 Tremont Street

Boston 02111 Tel. 727-6214

State Policy on the Use of Potassium Iodide (KI) as a
"Thyroid Blocking Agent" During Incidents at Nuclear Power Reactors

It is the decision of the Radiation Control Program of the Massachusetts Department of Public Health that potassium iodide not be stockpiled for distribution during a nuclear power plant incident nor will administration of KI be recommended for the general population. At the discretion of the Commissioner of Public Health KI will be recommended for use by emergency personnel only in extraordinary circumstances. In this case the utilities will provide the KI to be used by emergency workers.

Rationale

1. Large quantities of KI are not commercially available at the present time.
2. The levels of radioiodines which would be released offsite during incidents at nuclear power reactors would not warrant administration of a thyroid-blocking agent as a protective action.
3. Side effects of administration of KI, including minor and serious allergic reactions, are unacceptable risks.
4. The shelf-life of KI is unpredictable.
5. Difficulties in communicating the time and quantity of KI to be taken if KI were stored at each residence makes it an impractical protective action.
6. Logistical difficulties and time problems are significantly large for even and thorough distribution of KI if it were centrally stockpiled.
7. Possibility of people taking the KI on their own the minute anything happens at the reactor.
8. Possibility of children taking KI without supervision.
9. Possibility of elderly people all alone and having an allergic reaction.

1/25/82

Item No. Ex-31 "The bus driver for Kingston driving the evacuation pick-up route strayed off course for approximately 15 minutes because of improper map reading."

Source: FEMA 1989 Exercise Report, p. 61

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 18)

Jurisdiction Involved: Kingston

Boston Edison Response:

This was not a generic problem. Only one of the 21 bus drivers who were observed strayed off course temporarily. The transportation function was not affected and FEMA noted that the route was completed. According to the FEMA Report, "The entire evacuation route was run and the bus returned to the TSA."

Corrective Actions:

Training will continue to emphasize reading of bus route maps. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-32 "A van driver in Kingston did not check or record dosimeter readings and a bus driver in Plymouth did not record dosimeter readings according to plans and procedures."

Source: FEMA 1989 Exercise Report, p. 61

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 18)

Jurisdiction Involved: Kingston, Plymouth

Boston Edison Response:

Only two emergency workers who were observed during the exercise did not record dosimetry readings.

Corrective Actions:

Training for all emergency workers will continue to emphasize the importance of checking and recording dosimetry readings. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-33 "The map to the host facility for Provincial Residence (the Cardinal Cushing Hospital in Brockton), are not concise and do not provide the correct exit number from Route 24."

Source: FEMA 1989 Exercise Report, p. 61

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 18)

Jurisdiction Involved: Kingston

Boston Edison Response:

The driver correctly made the trip from Provincial to Cardinal Cushing. The one small error in the directions has been corrected to reflect the proper directions including the exit number off Route 24. Corrected maps can be found in Town of Kingston IP-50 (Draft-3, June 25, 1990), entitled "Provincial Residence".

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-34

"The map from Manomet Elementary School to Bennet Elementary School and the map from the New Testament School to the Hopewell School contained errors in the written instructions and lacked landmarks. Though the routes were run successfully, there was delay caused by the inaccuracies."

Source: FEMA 1989 Exercise Report, p. 65

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Plymouth

Boston Edison Response:

The errors in those maps were minor in nature and occurred in areas outside the EPZ, however, the maps have been corrected and can be found in Town of Plymouth IP-55 (Draft-1, July 6, 1990), entitled "New Testament Christian School" and Town of Plymouth IP-06 (Draft-5, June 15, 1990), entitled "Plymouth Public Schools and Plymouth-Carver Regional School District".

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-35 "MCDA did not officially designate host facilities for the schools in Marshfield and Duxbury. As a result, the bus routes were not adequately demonstrated. There was a significant delay in reaching the host facility (Criminal Justice Training Center, Needham) once the location was determined, because the bus drivers did not have the appropriate maps to the Criminal Justice Training Center in Needham."

Source: FEMA 1989 Exercise Report, p. 65

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: MCDA

Boston Edison Response:

See Response to Item Tr-5 with regard to host facilities for Marshfield and Duxbury Schools.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-36

"According to the Kingston school procedure, the school bus convoy would be accompanied by a lead and follow car equipped with CB radios and roof-mounted beacon lights. This equipment was not available at the Silver Lake High School."

Source: FEMA 1989 Exercise Report, p. 65

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Kingston

Boston Edison Response:

The CB radio and beacon lights have been provided to Silver Lake Regional High School.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-37 "Barricades were not delivered by the MDPW to ACP HA-AT-01 as called for in the Traffic Management Plan."

Source: FEMA 1989 Exercise Report, p. 68

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 20)

Jurisdiction Involved: MCDA Area II

Boston Edison Response:

After discussions with the participants, we believe that the barricades were actually delivered. The access control points (ACP) were scheduled to be set-up and observed out of sequence. HA-AT-01 was to be the first ACP observed by the FEMA Evaluating Team, but was missed by the evaluators due to an exercise scenario sequencing problem.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-38 "Personnel at some ACP/TCP's did not know the location of the reception center that traffic was routed towards."

Source: FEMA 1989 Exercise Report, p. 69

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 20)

Jurisdiction Involved: EPZ Towns

Boston Edison Response:

Providing directions to evacuating traffic is not a function of the TCP/ACP personnel. The Traffic Control Checklist directs TCP/ACP personnel to refer motorists to the EBS messages if they need information. Because residents of different towns (and even portions of the same town) go to different reception centers, it is unrealistic to expect TCP/ACP personnel to interview drivers in order to determine proper reception centers for them. The public is informed of reception center locations through other means (Emergency Broadcast System announcements, local phone books, public information brochures, placards and flyers). TCP/ACP personnel answering questions would slow down the evacuation process.

In addition, FEMA suggested the following in a 1988 Shoreham (LILCO) ARCA. "Traffic Guides do not have complete or correct information on the appropriate destination for evacuees. All Traffic Guides should be trained to advise motorists with questions to tune to the EBS station (WALK) for the latest information on all matters related to the emergency, including the location of the Reception Center."

Personnel performed their tasks properly and according to procedures, as stated in the FEMA report. "All of the participants in these TCP demonstrations showed good technical knowledge of procedures."

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-39 "At the Taunton Reception Center the Medical Evaluator was not present for the exercise as required by the plan. The lack of the medical evaluator created a problem when a simulated evacuee medical problem occurred."

Source: FEMA 1989 Exercise Report, p. 72

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: Taunton

Boston Edison Response:

Personnel are available to fill this position but the Medical Evaluator designated to perform during the exercise was not present. It is unclear why the Medical Evaluator was not present.

Corrective Actions:

The medical evaluator duties will be included as an objective at the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-40 "The electrical system to the decontamination trailer for males at the Wellesley Reception Center was not functioning, resulting in lack of lighting and hot water."

Source: FEMA 1989 Exercise Report, p. 72

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

The renovations of the Wellesley Reception Center are complete and monitoring/decontamination activities are now performed inside the renovated building. Therefore, the temporary decontamination trailers are no longer at the Reception Center.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-41 "The Reunification Clerk at the Wellesley Reception Center had no access to communications for contacting Reunification Clerks at the other reception centers."

Source: FEMA 1989 Exercise Report, p. 72.

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley.

Boston Edison Response:

There is nothing in the procedure that would require the Reunification Clerk to be in touch with his/her counterpart at the other Reception Centers. See Wellesley DPW IP-01 (Draft-2, June 26, 1990), entitled "Reception Center Staff".

Corrective Actions:

Boston Edison will work with Commonwealth officials to modify the facility layout to designate a phone for use by the Reunification Clerk, if determined to be necessary.

Schedule For Completion

December 1990

Item No. Ex-42 "The Bridgewater CCC Manager was not aware of the shelter's capacity, means of providing food, State provisions for accommodating the mobility-impaired, and was not familiar with all procedures."

Source: FEMA 1989 Exercise Report, p. 74

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 22)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

The Commonwealth of Massachusetts is not involved with procedures for American Red Cross (ARC) Congregate Care Centers (CCCs) nor with training for ARC personnel managing them. This is an ARC function.

Corrective Actions:

Boston Edison will work with the Commonwealth to encourage the American Red Cross (ARC) to address exercise issues which relate to ARC activities. See letter from R. Varley to R. Boulay re: Response to Exercise Findings (October 4, 1990) attached to this response.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

EX-42



BOSTON EDISON

Emergency Preparedness Department
59 Industrial Park Road
Plymouth, Massachusetts 02360

October 4, 1990
EP90-0698

Mr. Robert Boulay, Director
Massachusetts Civil Defense Agency
Office of Emergency Preparedness
P.O. Box 1496
Framingham, MA 01701-0317

Dear Mr. Boulay:

My staff recently completed an assessment of FEMA's 1989 Graded Exercise report for Pilgrim Station. Below is a list of those items which relate to the radiological emergency response activities of the American Red Cross in conjunction with the Massachusetts Civil Defense Agency.

These findings are categorized as Areas Requiring Corrective Action (ARCAs). As you know, ARCAs must be responded to, corrected, and demonstrated in the next FEMA evaluated exercise.

The Boston Edison Emergency Preparedness Department staff will continue, as we have in the past, to support your agency in making improvements to the Offsite Program for Pilgrim Station.

The FEMA exercise items requiring our attention are as follows:

1. ARCA, Objective 22 - "The Bridgewater CCC Manager was not aware of the Shelter's capacity, means of providing food, State provisions for accommodating the mobility-impaired, and was not familiar with all procedures."
2. ARCA, Objective 22 - "Both the school principal and the ARC Representative thought that they would be in charge of the Bridgewater CCC during school hours."
3. ARCA, Objective 22 - "Neither the Bridgewater nor the Taunton CCC Managers were aware of the available State assistance in accommodating mobility-impaired evacuees."

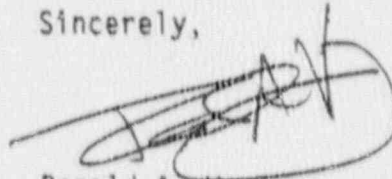
Suggested Corrective Actions:

Encourage and assist the American Red Cross (ARC) to provide adequate training to Congregate Care Center (CCC) staff on CCC procedures, facility capabilities, and State assistance available for accommodating the mobility-impaired.

In order to be properly demonstrated, this must be completed prior to the next graded exercise scheduled for August of 1991.

We look forward to working with you and the American Red Cross to address the above items and if you have any questions or comments, please contact me at (508) 747-9464.

Sincerely,



Ronald A. Varley
Manager, Emergency Preparedness

RW/jwl

EOF3487

cc: R. Hausner
R. Markovich

Item No. Ex-43 "Both the school principal and the ARC representative thought that they would be in charge of the Bridgewater CCC during school hours."

Source: FEMA 1989 Exercise Report, p. 75

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 22)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

This item arose because one part of the facility serves as a host school (under the principal's supervision) and a separate portion of the facility serves as a Congregate Care Center (CCC) (under American Red Cross supervision).

The Commonwealth of Massachusetts is not involved with procedures for American Red Cross (ARC) Congregate Care Centers (CCCs) nor training for ARC personnel managing them. This is an ARC function.

Corrective Actions:

Training for the principal will clarify the dual role at this facility and the separation of responsibilities. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Boston Edison will work with the Commonwealth to encourage ARC to address the exercise items that relate to ARC activities. See letter from R. Varley to R. Boulay re: in Response to Exercise Findings (October 4, 1990) attached to Item Ex-42.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-44 "Neither the Bridgewater nor the Taunton CCC Managers were aware of the available State assistance in accommodating mobility-impaired evacuees."

Source: FEMA 1989 Exercise Report, p. 75

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 22)

Jurisdiction Involved: Bridgewater, Taunton

Boston Edison Response:

The Commonwealth of Massachusetts is not involved with procedures for American Red Cross (ARC) Congregate Care Centers (CCCs) nor training for ARC personnel managing them. This is an ARC function.

Corrective Actions:

Boston Edison will work with the Commonwealth to encourage the American Red Cross to address exercise items that relate to their activities. See letter from R. Varley to R. Boulay re: Response to Exercise Findings (October 4, 1990) attached to Item Ex-42.

Schedule For Completion

Not applicable

Item No. Ex-45

"The ambulance crew did not follow appropriate procedures to prevent cross-contamination of the patient, the crew, and the interior of the ambulance. For example, the patient was improperly covered, the interior of the ambulance was not covered with a protective draping, and the crew moved about and touched the interior and exterior of the ambulance without removing or changing gloves."

Source: FEMA 1989 Exercise Report, p. 77

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 23)

Jurisdiction Involved: Hospital/EMS

Boston Edison Response:

None

Corrective Actions:

Training will emphasize the procedures and importance of contamination control. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for a future exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-46 "At the Kingston EWMDS staff members were not fully trained in the operation of the G-M meter."

Source: FEMA 1989 Exercise Report, p. 80

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 25)

Jurisdiction Involved: Kingston

Boston Edison Response:

According to the FEMA Report regarding the Kingston EWMDS, "Most workers were familiar with proper monitoring techniques, knew the contamination trigger levels, and demonstrated very good procedure throughout the exercise."

Corrective Actions:

Training for Kingston EWMDS staff will continue to emphasize the operation of the monitoring equipment. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for the next exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-47

"The message describing the restricted area drafted by the State during the recovery and reentry tabletop demonstration was unclear and incomplete. The information on the restricted area did not include the Plymouth Beach area and a small section of Rocky Hill Road near the plant site. In addition, the message did not explain to the public the difference between restricted and unrestricted areas, nor the procedures which would be in place to allow necessary emergency reentry to the restricted area."

Source: FEMA 1989 Exercise Report, p. 84

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 33)

Jurisdiction Involved: MCDA

Boston Edison Response:

Despite the suggestion that this affected Recovery/Reentry, the FEMA Report says, "The ability to implement appropriate measures for controlled reentry and recovery was successfully demonstrated by the State of Massachusetts and the five EPZ communities of Plymouth, Duxbury, Kingston, Carver, and Marshfield on day 2 of the exercise."

In addition, we feel that the level of detail suggested by FEMA might be excessive for understanding by the public.

Corrective Actions:

Training on EBS message formulation will be conducted for key Commonwealth staff. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

This will be scheduled as an objective for a future exercise.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-48 "Some of the persons identified in the Duxbury plan who would staff a shift change did not do so. Specifically, a shift change for the Civil Defense Director, the Council on Aging Officer and the Transportation Officer did not occur."

Source: FEMA 1989 Exercise Report, p. 87

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 34)

Jurisdiction Involved: Duxbury

Boston Edison Response:

According to the Duxbury response contained in the Appendix to the Commonwealth's Official Report and Comment on the Draft FEMA Exercise Report, dated July 16, 1990, "The listed EOC personnel in fact, did demonstrate a shift change as required."

Corrective Actions:

A shift change for those personnel will be included as an objective in the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-49 "In the Plymouth EOC, one key staff member (Transportation Officer) did not perform a shift change as provided in the extent of play."

Source: FEMA (98) Exercise Report, p. 87.

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 34)

Jurisdiction Involved: Plymouth

Boston Edison Response:

The alternate scheduled to participate in the exercise was called to duty for a real disaster (Hurricane Hugo).

Corrective Actions:

This shift change will be included as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-50 "All key staff identified to perform an actual shift change in the Bridgewater plan did not do so. The Civil Defense Director, the EOC Fire Representative, the Radiological Officer, the American Red Cross Representative, and the Communications Officer did not demonstrate a shift change."

Source: FEMA 1989 Exercise Report, p. 88

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 34)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

None

Corrective Actions:

A shift change at Bridgewater for the positions in question will be included as an objective at the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-51 "The Kingston EWMDS staff did not provide an actual shift change for the following key positions: Team Leader, Initial Personnel Monitor and Decontamination Assistant."

Source: FEMA 1989 Exercise Report, p. 88

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 34)

Jurisdiction Involved: Kingston

Boston Edison Response:

According to the FEMA Report, "At the Kingston EWMDS, eleven trained, knowledgeable and proficient personnel were mobilized for the first shift."

The procedure Town of Kingston IP-22 (Draft-6, September 12, 1989), entitled "Emergency Worker Monitoring and Decontamination" pp. 1-2 calls for seven (7) individuals for each shift at the EWMDS. During the exercise eleven (11) EWMDS workers arrived, four (4) of them to demonstrate the shift change objective. The four individuals are listed for the following "key positions" as identified in the extent of play for the exercise: Team Leader, Personnel Monitor, Vehicle Monitor, and Decontamination Assistant.

The reason the four shift turnover personnel arrived with the others is that the Kingston EWMDS demonstration was conducted out of sequence and late in the evening. It would have been unreasonable to ask these individuals to await the normal progress of the demonstration before being called to demonstrate relief capability.

Corrective Actions:

This will be scheduled as an objective for the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-52 "The American Red Cross Representative (identified as a key position) at the Taunton EOC did not perform a shift change."

Source: FEMA 19C9 Exercise Report, p. 88

Type of Finding: ARCA (PI, ARCA, or ARFI) (Objective 34)

Jurisdiction Involved: Taunton

Boston Edison Response:

The alternate, scheduled to participate in the exercise, was called to duty for a real disaster (Hurricane Hugo).

Corrective Actions:

A shift change will be included as an objective at the next exercise.

Schedule For Completion

Not applicable

Item No. Ex-53 "The Bridgewater EOC did not post the correct time that the Alert ECL was declared."

Source: FEMA 1989 Exercise Report, p. 19

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 1)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

None.

Corrective Actions:

Training for the Bridgewater EOC staff will emphasize proper interpretation of the Emergency Classification Level (ECL) times shown on the message forms and the importance of posting them correctly. See Memorandum from Dick Finn to R. Markov'ch re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-54 "The Fire Department representative did not arrive at the Bridgewater EOC until 1021, delaying full staffing."

Source: FEMA 1989 Exercise Report, p. 22

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 2)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

According to the FEMA Report, "The host EOC's were also activated in a timely manner . . . "

Corrective Actions:

Training for EOC staff will emphasize the importance of quickly proceeding to and activating the EOC. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-55 "The NIAT field monitoring teams experienced periodic noise on their NIAT radio system and had to use their back-up system in order to communicate with their Environmental Emergency Team Coordinator."

Source: FEMA 1989 Exercise Report, p. 30

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 4)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

Back-up C.D. radios were successfully demonstrated with further back-up provided by commercial telephone. Communications with field personnel were maintained throughout the exercise.

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-56 "The Bridgewater EOC's maps for evacuation routes, TCPs, and reception centers as well as the status boards, including the Host School/Mass Care, were of poor quality or not properly maintained."

Source: FEMA 1989 Exercise Report, p. 33

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 5)

Jurisdiction Involved: Bridgewater

Boston Edison Response:

None

Corrective Actions:

Boston Edison will work with the Town of Bridgewater to investigate this matter and correct the maps and status boards, where necessary, prior to the next exercise.

Schedule For Completion

Prior to the next scheduled exercise.

Item No. Ex-57 "The Morton Hospital workers failed to properly annotate the appropriate form after zeroing-out their dosimeters."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: Hospital/EMS

Boston Edison Response:

None.

Corrective Actions:

Training will emphasize the importance of and procedure for recording DRD reading results. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-58 "Although a majority of the emergency workers throughout the EPZ have received dosimetry training, a few workers have not been trained in proper documentation procedures."

Source: FEMA 1989 Exercise Report, p. 36

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 6)

Jurisdiction Involved: All EPZ

Boston Edison Response:

None.

Corrective Actions:

Training for all emergency workers will continue to emphasize dosimeter reading and proper documentation. See Memorandum from Dick Finn to R.

Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-59 "Check sources were not included in the kits or used prior to deployment."

Source: FEMA 1989 Exercise Report, p. 37

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 7)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

Check sources are located in the EOF logistics room but are not stored in the Field Team kits because there are Thermo-Luminescent Dosimeters (TLDs) stored in the kits and the two cannot be stored in close proximity.

Corrective Actions:

Location of the check sources will be annotated on the Field Team Kit inventory list to ensure that they can be located by the Field Teams.

Schedule For Completion

December 1990

Item No. Ex-60 "The monitoring team did not keep the probes on the instruments enclosed in thin plastic bags in order to minimize the possibility of contamination."

Source: FEMA 1989 Exercise Report, p. 38

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 7)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

According to the FEMA Report, "The teams demonstrated proper techniques in conducting and recording field radiation measurements" . . . They did record measurement data and dosimeter readings and promptly relayed the information to the EETC at the EOF."

Corrective Actions:

Plastic bags will be included in the kits and on the inventory list.

Boston Edison will work with the Commonwealth to ensure that training will emphasize the use of plastic bags over the probes. See letter from R. Varley to R. Hallisey (October 4, 1990) re: Response to Exercise Findings attached to Item Ex-19.

Schedule For Completion

Equipment - October 1990

Item No. Ex-61 "One Field Team kit did not have a set of maps."

Source: FEMA 1989 Exercise Report, p. 38

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 7)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

According to FEMA, "One kit contained a set of maps while the other did not. Extra maps were available in the equipment room and both teams had sufficient maps before they were deployed. The maps were easy to read and follow. They included pre-designated sampling/monitoring locations, evacuation routes, siren locations, and special facilities such as hospitals, schools, and fire stations. Both teams used their maps and were able to find their assigned monitoring points."

Maps have been included in the Field Monitoring Team kits .

Corrective Actions:

Maps will be added to the Field Monitoring Team inventory lists.

Schedule For Completion

December 1990

Item No. Ex-62 "One monitoring team did not properly complete the emergency environmental sample log, form D-4. Consequently, the sample volume of 12 feet was not included with the sample information."

Source: FEMA 1989 Exercise Report, p. 40

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 8)

Jurisdiction Involved: MDPH/NIAT

Boston Edison Response:

According to the FEMA Report, "The count rates determined from the field analyses were promptly and correctly transmitted to the EETC. The samples were bagged and labeled in preparation for transfer to the radiation laboratory for a detailed isotopic analysis. Pre-scripted labels were included in the equipment kit which identified the information required by the State laboratory. The labels, however, are not required in the NIAT procedures and one team did not use them. That team used masking tape instead and did not properly complete their emergency environmental sample log, Form D-4. Consequently, the sample volume of 12 cubic feet was not included with the sample information."

The air sampling process was done correctly except for the documentation of one parameter.

Corrective Actions:

Boston Edison will work with the Commonwealth to ensure that NIAT procedures will be revised to require the use of the prescribed labels and to ensure that training emphasizes the importance of using the prescribed sampling labels. See letter from R. Varley to R. Hallisey (October 4, 1990) re: Response to Exercise Findings attached to Item Ex-19.

Schedule For Completion

Not applicable.

Item No. Ex-63 "Neither the State EOC nor the EETC at the EOF notified YAEL that they would be receiving samples from the State field monitoring teams."

Source: FEMA 1989 Exercise Report, p. 41

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 9)

Jurisdiction Involved: MCDA/MDPH

Boston Edison Response:

Participation by Yankee Labs was not an exercise objective and notification of YAEL was not specified under the extent-of-play for the objectives. The participants were informed during the exercise that notification was not necessary. It is included in NIAT procedures and normally would be done.

Corrective Actions:

None required

Schedule For Completion

Not applicable

Item No. Ex-64 "Although a supply of the Emergency Public Information Brochure was available in the Media Center, the brochures inadvertently were not inserted into the media kit."

Source: FEMA 1989 Exercise Report, p. 53

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 14)

Jurisdiction Involved: Media Center

Boston Edison Response:

None

Corrective Actions:

Media kits will each be supplied with a Public Information flyer, which provides a summary of the PIB.

Schedule For Completion

December 1990

Item No. Ex-65 "Not enough time was given to meaningful coordination of information among PIO's."

Source: FEMA 1989 Exercise Report, p. 53

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 14)

Jurisdiction Involved: Media Center

Boston Edison Response:

None

Corrective Actions:

Training will emphasize the importance of allowing adequate time for coordination among PIOs. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-66 "The Fire Chief at the Carver EOC told his emergency workers to take KI even though the message regarding KI was not directed to Carver."

Source: FEMA 1989 Exercise Report, p. 56

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 16)

Jurisdiction Involved: Carver

Boston Edison Response:

None

Corrective Actions:

Training will emphasize the fact that KI is supposed to be administered only upon direction by the Commonwealth to do so. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-67 "The RO at the Plymouth EOC briefed nursing homes concerning KI even though the local plan indicates that the Public Health Officer should perform this function."

Source: FEMA 1989 Exercise Report, p. 56

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 16)

Jurisdiction Involved: Plymouth

Boston Edison Response:

None

Corrective Actions:

Training will emphasize the importance of following established procedures. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-68 "The New Testament School principal did not complete the transportation worksheet or relay transportation requirements to the Plymouth EOC."

Source: FEMA 1989 Exercise Report, p. 65

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Plymouth

Boston Edison Response:

According to the FEMA Report, "The town of Plymouth successfully demonstrated its ability to implement the precautionary transfer of students".

Corrective Actions:

Training for the principal will emphasize the importance of completing the transportation worksheet and relaying the requirements to the Plymouth EOC.

See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-69 "The Marshfield Transportation Officer did not follow the plans and procedures when he called the transportation provider directly instead of coordinating his requirements with the Area II EOC."

Source: FEMA 1989 Exercise Report, p. 66

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Marshfield

Boston Edison Response:

Marshfield procedures have been revised to clarify transportation responsibilities. See Town of Marshfield IP-09 (Draft-4, February 8, 1990), entitled "Transportation" p. 5, step 12 and Town of Marshfield IP-06 (Draft-2, September 6, 1990), entitled "School Department" p. 6, step 3.

Corrective Actions:

Training for the transportation officer will emphasize the process for obtaining transportation. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-70

"Upon arrival at the John Carver School, the bus which was to be used for the school demonstration was incorrectly directed into the Staging Area where it was to be used for evacuating the general public. While this situation was cleared up by a discussion between the Staging Area Manager and the Principal, the TSA location was not clearly marked and could not be distinguished from the school."

Source: FEMA 1989 Exercise Report, p. 66

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Carver

Boston Edison Response:

The error did not cause a delay and was quickly rectified with the bus being appropriately dispatched to the Host School in Bridgewater.

Corrective Actions:

Boston Edison will work with the Town of Carver to investigate and resolve discrimination of the Transportation Staging Area from the remainder of the school parking areas.

Schedule For Completion

December 1990

Item No. Ex-71 "According to the Plymouth plan, the Operations Officer in the EOC has the responsibility of contacting the private schools and day care centers in Plymouth. This is not a traditional function of an Operations Officer and was completed in a marginal fashion during the exercise."

Source: FEMA 1989 Exercise Report, p. 66

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Plymouth

Boston Edison Response:

We are unaware of any intent on the part of Plymouth officials to change the responsibility to another position.

Corrective Actions:

None Required

Schedule For Completion

Not applicable

Item No. Ex-72 "In general, there was a lack of awareness at the host schools concerning the estimated time of EPZ student arrival and the numbers of students to expect. The information should be passed from the EPZ EOC to the host EOC then to the host facility."

Source: FEMA 1989 Exercise Report, p. 66

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 19)

Jurisdiction Involved: Taunton

Boston Edison Response:

None

Corrective Actions:

Training will emphasize the importance of this information flow. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-73 "At the Wellesley Reception Center, on one occasion, an evacuee was told to remove the plastic bocties before being monitored with the CDV-700 in order to locate an area of contamination. This could possibly result in the contamination of the area where the monitoring was being done."

Source: FEMA 1989 Exercise Report, p. 72

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

None

Corrective Actions:

Monitoring procedures training for Reception Center Monitors will stress monitoring techniques and contamination control. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-7A

"At the Wellesley Reception Center, upon completion of the three-part Registration Form, the third part should have been turned in to the Reunification Clerk for filing. This was not done."

Source: FEMA 1989 Exercise Report, p. 72

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

None

Corrective Actions:

Training will emphasize proper distribution of the Registration Form. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-75 "At the Wellesley Reception Center there was no one to ensure that evacuees went to the registration desk after leaving the monitoring/decontamination area."

Source: FEMA 1989 Exercise Report, p. 73

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 21)

Jurisdiction Involved: MDPW Wellesley

Boston Edison Response:

Evacuees are instructed by monitoring/decontamination personnel to proceed to the Registration Area.

Corrective Actions:

Training will emphasize the importance of instructing evacuees to proceed to the Registration Area. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training program is an ongoing process.

Item No. Ex-76 "The radiological survey of the patient was not performed properly (e.g., probe closed when surveying victim's extremities, probe not covered to prevent contamination, probe coming into contact with contaminated source)."

Source: FEMA 1989 Exercise Report, p. 77

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 23)

Jurisdiction Involved: Hospital/EMS

Boston Edison Response:

None

Corrective Actions:

Training of reception center personnel will emphasize proper radiological monitoring techniques. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-27 "The patient remained in the ambulance for 12 minutes before being removed to the RIA."

Source: FEMA 1989 Exercise Report, p. 78

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 25)

Jurisdiction Involved: Hospital/EMS

Boston Edison Response:

The patient, while waiting in the ambulance, did receive care/treatment and the FEMA Report says, "The treating physician inquired as to the condition of the patient."

Corrective Actions:

None required

Schedule for Completion

Not applicable

Item No. Ex-78 "The Morton Hospital procedures were not followed in the REA when the floor covering was not taped securely at the doorways."

Source: FEMA 1989 Exercise Report, p. 78

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 24)

Jurisdiction Involved: Hospital/EMS

Boston Ed's on Response:

None

Corrective Actions:

Training will emphasize the taping down process. See Memorandum from Dick Finn to R. Markovich re: Exercise Findings for Training Emphasis (September 27, 1990) attached to Item Ex-10.

Schedule For Completion

The Commonwealth's Emergency Worker Training Program is an ongoing process.

Item No. Ex-79 "There were minor equipment problems in the vehicle area at the Plymouth/Carver EWMDS such as unweighted plastic stanchions that blew over in the wind, and the use of a small informational sign which was not very visible."

Source: FEMA 1989 Exercise Report, p. 80

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 25)

Jurisdiction Involved: Plymouth, Carver

Boston Edison Response:

According to the FEMA Report, "Superior facilities were available at Plymouth/Carver and Kingston". FEMA states that this is a minor equipment problem. Boston Edison will evaluate the equipment for possible changes.

Corrective Actions:

Evaluate EWMDS equipment

Schedule For Completion

February 1991

Item No. Ex-80 "At the Marshfield EWMDS, the single shower is on the second floor which is accessed by a steep stairwell. The floor runners on the stairwell would be slippery and dangerous when wet."

Source: FEMA 1989 Exercise Report, p. 80

Type of Finding: ARFI (PI, ARCA, or ARFI) (Objective 25)

Jurisdiction Involved: Marshfield

Boston Edison Response:

According to FEMA, "All EWMDS's had adequate facilities for conducting the required activities." Boston Edison will evaluate the condition in the stairwell.

Corrective Actions:

Perform an evaluation of the EWMDS stairwell

Schedule For Completion

February 1991

V. CONCLUSION AND DISCUSSION OF CORRECTIVE ACTIONS

V. Conclusion and Discussion of Corrective Actions

This report has provided detailed, documented responses to the allegations and concerns reflected in the September 6 public meeting transcript and attachments, and to the findings contained in FEMA's final exercise report. It demonstrates the breadth and effectiveness of what we believe to be one of the finest offsite emergency response programs in the country.

In the course of our review, some areas for correction have been identified. Enclosure D to this report lists those items in the report for which a need for corrective action has been identified.

As we stated in the Introduction, many actions have been or are being taken to maintain and enhance the offsite program. The two Deficiencies previously identified by FEMA have been corrected. Identification of ARCAs as the result of an exercise is very common and does not suggest that an offsite planning program is inadequate. As indicated, FEMA permits exercise participants two years to demonstrate correction of such items. By definition, ARCAs are not viewed by FEMA as standing in the way of an interim finding of reasonable assurance.

We fully understand that emergency planning is an ongoing process that does not have an "end point". In this regard, Boston Edison has contributed over \$15 million in facility and equipment improvements to various offsite agencies over the past three years and we will continue to make contributions in the future. Boston Edison has also entered into

contracts for the annual funding of local community Civil Defense Directors and maintenance of emergency planning equipment.

We believe that a careful review of the items discussed in this report, (including those identified as requiring corrective action) will demonstrate that a comprehensive and effective offsite emergency response program has been established.

In short, the information contained in this report demonstrates that there is reasonable assurance that public health and safety will be adequately protected in the event of an emergency at Pilgrim Station.