

POWER AUTHORITY OF THE STATE OF NEW YORK

10 COLUMBUS CIRCLE NEW YORK, N. Y. 10019

(212) 397-6200

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September 2, 1982
IPN-82-63

Mr. Ronald C. Haynes
Regional Administrator
Office of Inspection and Enforcement
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

SUBJECT: Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Planned Corrective Actions for Significant
Deficiencies Identified in July 30, 1982
FEMA Interim Report

Dear Mr. Haynes:

As requested by your August 3rd, 1982 letter, please find herein a description of the activities which are planned or underway to correct the significant deficiencies listed by the Federal Emergency Management Agency (FEMA) to you in its "Interim Findings on the Adequacy of Radiological Emergency Response Preparedness of State and Local Governments at the Indian Point Nuclear Power Station".

These July 30th FEMA interim findings are related to the offsite emergency response preparedness of State and local governments in the vicinity of Indian Point. The activities to correct the deficiencies will, therefore, be a cooperative effort between the licensees and the government entities involved. We will provide support for the efforts of the State and counties.

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After discussions among the interested parties, the overall plan is comprised of the following basic elements:

- 1) Development of a consensus as to what must be accomplished in order to resolve significant deficiencies. This phase has generally been completed as a result of consultations between New York State and FEMA in mid-August and at another working session between the State and licensees. The details are clarified by Attachment A and are the result of FEMA and New York State and utility efforts.
- 2) Close licensee cooperation with New York State during the development and implementation of specific resolutions of the significant deficiencies will be accomplished during periodic work sessions between the responsible organizations. Based on these meetings, some approaches may change as desirable alternatives become apparent. While the principal activities will be conducted by State and local governments, there are some measures necessary where the licensees will be principal contributors, such as the Alert and Notification System (ANS) communication with transient populations, and brochure content and distribution.
- 3) Bi-weekly status sessions among responsible parties at which progress in implementing adequate corrections will be discussed and agreed upon.

The status of the ANS is provided as follows. A telephone survey conducted by the utilities subsequent to the March 3rd exercise indicated that a number of sirens had not been heard by residents living near those sirens. Subsequent to the exercise, the utilities jointly conducted a complete re-test and maintenance on each of the sirens in the ANS.

As with any new installation, the re-test uncovered problems that related to initial construction and first time operation of a system after the construction test program was completed. These problems were corrected prior to June 1, 1982 as noted in our June 9, 1982 letter to the NRC.

Our subsequent investigation revealed that there was a generic problem with sirens wherein our 125dB rated sirens provided only 119dB. On May 27, 1982, in a telephone conversation with NRC staff we noted this 6dB deficiency and also requested some clarification of certain of the acceptance criteria. We are continuing with our testing and analysis so that we have the necessary background information to respond rapidly should the FEMA acceptance criteria indicate a need to supplement the system.

In addition to this work, consideration is being given to the ordering of hardware and methods of facilitating the local permit process so that we may act rapidly if needs are identified. If this hardware were installed, we anticipate some sound level and system enhancement.

Other methods of notification are also being explored. For example, on May 27th the utilities formally requested that New York State explore the use of fire and Civil Defense sirens being sounded in unison with the utility-installed ANS in order to enhance the system. The state is currently exploring that option. The utilities are also purchasing tone activated radios for use at special facilities within the Emergency Planning Zone. These radios would alert the special facilities on activation of the EBS network. It is expected that distribution of these tone alert radios will begin within ninety days.

The Indian Point ANS is now functioning and the instances of incomplete functioning observed by FEMA during the March 3rd exercise have since been corrected. The FEMA acceptance test referred to in the interim findings is awaiting the development of FEMA criteria which will permit the FEMA evaluation of the ANS at our site. Based upon our discussion with FEMA we understand that this might occur in late 1982 and a determination by FEMA of system acceptability cannot be made until that time.

As FEMA noted, the withdrawal of Rockland County from the coordinated emergency preparedness process was a unilateral county action over which the licensees had no control. While licensees believe that the Rockland County issue will be resolved to the satisfaction of NRC and FEMA, Rockland County's action cannot serve as a basis for findings adverse to the continued licensing of the Indian Point units. To allow it to do so would denigrate the Commerce Clause and the Supremacy Clause of the Constitution of the United States by subjecting Federal law to a county governmental veto. Rockland County's action, therefore, would be contrary to congressionally established national policy.

New York State has assumed the responsibility of periodically notifying FEMA of the status of compensatory planning for Rockland County to the extent that the county's current planning and implementation capability may be deficient. By law New York State will provide emergency response when and if this is not performed by a local governmental authority.

While your August 3rd letter related only to those deficiencies identified as significant in the interim findings, others were not put in the significant category in the interim findings report. We will be working with State and local governments to correct these items as well, after activities to correct significant deficiencies are underway.

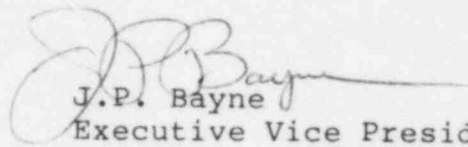
Mr. Ronald C. Haynes

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Since the issuance of the interim findings, the State of New York and FEMA have met to identify corrective measures which are adequate to correct significant deficiencies identified in the findings. We have been advised by New York State that what appears in Attachment A as New York State responsibilities represents the results of discussions between New York State and FEMA, and is complete with respect to measures required.

Should you or your staff have any questions please call my office.

Very truly yours,


J.P. Bayne
Executive Vice President
Nuclear Generation

cc: Mr. Brian Grimes, Director
Division of Emergency Preparedness
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Resident Inspector's Office
Indian Point 3
U.S. Nuclear Regulatory Commission
P.O. Box 38
Buchanan, New York 10511

Mr. Ron Barton
United Engineers and Constructors, Inc.
30 S. 17th Street
Philadelphia, PA 19101

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 30, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

E. Notification

(a) Siren system requires further correction.

(a) Subsequent to the exercise, the utilities jointly conducted a complete retest and maintenance program on each of the sirens in the ANS system. The Indian Point ANS system is now functional.

Final resolution of the alert and notification system (ANS) issue can not be accomplished until FEMA has developed acceptance criteria which will permit evaluation of the ANS at each site.

Results of studies and tests (see cover letter) are being reviewed to determine the need for enhancement. In parallel with this work, consideration is being given to ordering hardware and compensatory measures such as the use of existing fire and civil defense sirens is being investigated by the State. Tone activated radios are being purchased for use at special facilities within the 10 mile EPZ.

(b) State and county plans lack specific criteria for content and use of EBS messages.

(b) All protective action orders and all actions affecting the public will be included in the EBS messages. A system will be developed to insure the content of all EBS messages and the prompt and accurate transfer of such messages to the EBS stations. News releases will include information given in the EBS messages.

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 30, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

E. Notification (Con't)

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| (c) Procedures for PIO's should be revised to include the specific items listed in E. (b), (h), G. (d), (e), (f). | (c) All revisions necessitated by the interim findings will be incorporated or referenced in the State and county PIO procedures. |
| (d) Inadequate notification of Rockland emergency personnel and local schools. | (d) The State will work with Rockland County, to improve initial call out methods for emergency personnel and local school notification. |
| (e) Procedures for establishing contact with Federal agencies should include office phone numbers. | (e) The State Plan will include the telephone numbers of Federal agency office numbers. These numbers are currently listed primarily in controlled copies at the State Warning Point. |
| (f) PIO training is necessary on revised procedures. | (f) Upon the completion of the PIO procedure revisions, all State and county PIO's will be trained on such procedures. See E (c) above. |
| (g) FEMA does not have the most up-to-date EBS plan. | (g) The Emergency Broadcast System procedures for the Hudson Valley and Catskill New York Operational Area and Plan will be sent to FEMA. |
| (h) The specific details of EBS activation for the four county area are not in the EBS plan. | (h) The specific details of EBS activation for the four county area, not reflected in the EBS plan (noted above) shall be detailed in each State and county plan and provided to the lead EBS Station. |

Meetings will be arranged with EBS station management to explain its importance and its operation as it relates to the emergency planning efforts.

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 20, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

G. Public Education and Information

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| (a) The public appears to be uninformed about the Radiological Emergency Preparedness Plan. | (a) The public education program which is being developed by the State, counties and utilities will be implemented. |
| (b) Inadequate distribution of the brochure, "Indian Point Emergency Planning & You." | (b) Further clarification by the State from the FEMA Regional Assistance Committee (RAC) has been requested. Copies of the previously transmitted distribution methodology letters were forwarded to FEMA. Brochure distribution methodology will be reviewed on an ongoing basis in an effort to assure that all those within the 10 mile EPZ receive the appropriate brochure during the planned annual distribution. |
| (c) Need for publication of the brochure in language(s) other than English. | (c) Although not a NUREG-0654 criterion the State, counties, and utilities will investigate the need for publication of the brochure in language(s) other than English or some other foreign language program. A survey will be done on the number of non-English speaking residents in the 10 mile emergency planning zone. |
| (d) Inadequate arrangements for dealing with rumor control | (d) The rumor control program used at the August 11, 1982 FitzPatrick (JAF) Emergency Exercise and approved by all parties will serve as a basis for the rumor control program at Indian Point. This program will be tailored and then added to each State and county plan. |

Statement of DeficiencyProposed Corrective Actions

G. Public Education and Information (Con't)

- (e) A more adequate description of the public information program, news media briefings and notification of transients should be in the State and county plans.
- (f) Arrangements and procedures for the joint media facility need to be described in detail in the plan.

- (e) An outline of the public information program, news media briefings and notification of transients will be in the State and county plans. Specific details of this program will be forwarded to FEMA upon completion (i.e., pamphlets, posters, telephone book inserts etc.)
- (f) Although not a NUREG-0654 criterion, State and county plans will describe or will reference other documents containing the floor plan, equipment and location information for the joint media facility. Further clarification has been requested by the State, from the RAC.

J. Protective Response

- (a) Methods for notification of transients must be provided.
- (b) Maps which include population by ERPA should be displayed in EOCs.
- (c) The State has decided not to provide thyroid blocking agents to emergency workers.

- (a) Posters and telephone book insert information will be forwarded to FEMA upon completion. See G (e) above.
- (b) Maps with population distribution by ERPA are available for use at State and county EOCs. RE^{DO} will provide population information on EOC maps to RAC.
- (c) State policy now calls for the provision and dissemination of KI (Potassium Iodide) to emergency workers and special populations. This policy will be included in the State Plan.

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 30, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

J. Protective Response (Con't)

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| (d) The plans provide insufficient site-specific means for dealing with impediments to evacuation. | (d) Further details of the means for clearing evacuation routes will be included or referenced in State and County plans. |
| (e) Describe more adequately in the State plan, the measures for protection of the ingestion pathway. (Maps, lists of food processors, identification of reservoirs, etc., must be provided or material adequately referenced.) | (e) Further clarification has been requested by the State from the RAC in order that appropriate detail is more adequately described in the State Plan. |
| (f) Procedures should be developed to provide monitoring capability at congregate care centers. | (f) The capability for monitoring of evacuees at congregate care centers as well as at reception centers will be added to the plans.

Added capability includes equipment, training and manpower. |
| (g) Inadequate collection and transmission of field data for consideration of decision makers. | (g) Additional Standard Operating Procedures for collection and transmission of field data will be developed. Utility, county and EOC staffs will be trained on the additional procedures. |
| (h) Evacuation of non-institutionalized mobility impaired persons is not addressed. | (h) Further clarification is needed and will be requested by the State from RAC to define what is adequate to satisfy this element. |

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 30, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

J. Protective Response (Con't)

- (i) No evacuation commitments from Bus Operators, or locations and number of buses, bus radios and maps.
- (j) Some relocation centers are located too close to the plume exposure EPZ.
- (k) During the exercise, a lack of maps was noted at the State and some county EOCs.

- (i) Compensatory measures are being pursued.
- (j) The State has requested a list of the specific centers from FEMA. Appropriate revisions will be made.
- (k) Additional maps are now available. The State has requested RAC to identify specific types and locations where additional maps should be located.

K. Radiological Exposure Control

- (a) Absence of permanent dosimetry and 24-hour monitoring capability. More sensitive self-reading dosimeters are needed. No permanent record devices (film badges or TLDs) were available in the counties.
- (b) Demonstration of decontamination for emergency personnel needed.

- (a) Permanent dosimeters (TLDs) and self-reading pocket dosimeters (0-5 R) with chargers have been ordered. The capability for 24-hour operation (i.e., shift changes) will be demonstrated during the next exercise.
- (b) Decontamination procedures are being reviewed and modified. Personnel at appropriate locations will be trained in new methods and will be demonstrated at the next exercise.

ATTACHMENT A
SIGNIFICANT DEFICIENCIES JULY 30, 1982 FEMA INTERIM REPORT

Statement of Deficiency

Proposed Corrective Actions

K. Radiological Exposure Control (Con't)

(c) Decontamination levels posted in wrong sequence (Putnam Plan only).

(c) Levels will be displayed as needed. Personnel will be trained in application of requirements.

(d) Disposal of contaminated wastes is not adequately addressed in the county plans.

(d) The plan will describe the method for disposing of solid wastes.

The Westchester site chosen for decontamination will be changed.

(e) Inadequate calibration and maintenance of monitoring equipment.

(e) Equipment will be checked for proper operation semi-annually, to assure functioning.

P. Planning Responsibility

(a) Rockland's non-participation in the four county plan raises a question as to decision maker capability to respond in an emergency.

(a) Rockland County decision makers will be trained on radiological emergency response necessities. Compensatory measures will be outlined in the State Plan.

(b) In the absence of a Rockland County Plan, there is an inherent lack of capability to update such a plan.

(b) In the absence of a Rockland County Plan, provision will be included in the State Plan for updating Rockland response requirements.

(c) In the absence of a Rockland County Plan, there is an inherent liability to keep the plan current.

(c) In the absence of a Rockland County Plan, provision will be included in the State Plan for keeping Rockland response requirements current.

(d) Rockland's non-participation in the exercise and planning effort requires compensating measures to be taken.

(d) In the absence of a Rockland County Plan, compensatory measures will be included in the State plan to insure adequate emergency response in that county.