



Federal Emergency Management Agency

Region VII 911 Walnut Street Kansas City, Missouri 64106

SEP 22 1982

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Mr. James Keppler
 Regional Administrator, Region III
 U.S. Nuclear Regulatory Commission
 799 Roosevelt Road
 Glen Ellyn, Illinois 60137

Dear Mr. *Jim* Keppler:

Over the past two years there have been numerous instances of the violation of the 45 day submittal suspense date for exercise scenarios as provided in Guidance Memorandum 17. Most have arrived only two weeks in advance; some as little as the day prior to the scheduled exercise. The guidance was designed to allow for scenario review by FEMA and NRC so that necessary corrections could be made and evaluator preparations accomplished.

Two problems have arisen as a result of the delays. First, evaluators have not been given sufficient advance knowledge of scenario events to develop an effective program of expected offsite activity on which to base their observations. I am sure you will agree that an evaluator must know as much or more about scenario events as the exercise participants. Secondly, too little time has been available to determine if the scenario offers adequate offsite consequences to accomplish State and local objectives.

Because the detailed scenario development has traditionally been accomplished by the licensee, the burden of insuring scenario development and promulation is the responsibility of your office. Certainly, I realize the difficulties in monitoring this aspect of the exercise requirements; however, I cannot continue to commit both personnel and financial resources to an effort where, too often, we are asked to provide an evaluation without sufficient lead time to adequately prepare for that role.

Therefore, I feel that it is in the best interest of all parties concerned to consider postponing or cancelling any future exercises that do not meet at least the intent of the advance notification guidance.

I would be pleased to discuss this matter further with you.

Sincerely,

[Signature]
 Patrick J. Breheny
 Regional Director
 FEMA, Region VII

758-5912

Lets Talk!!

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