



Federal Emergency Management Agency

Washington, D.C. 20472

9 NOV 1982

MEMORANDUM FOR: Brian K. Grimes
 Director
 Division of Emergency Preparedness
 Office of Inspections and Enforcement
 U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
 Richard W. Krimm
 Assistant Associate Director
 Office of Natural and Technological Hazards

SUBJECT: Status Report on the Zimmer Nuclear Power Station Offsite
 Emergency Preparedness Issues

Attached are status reports from the Federal Emergency Management Agency (FEMA), Regions IV and V, on the verification of the Emergency Preparedness Completion Schedule submitted to the Atomic Safety and Licensing Board (ASLB) as part of the Zimmer hearing record by the Cincinnati Gas and Electric Company on March 3, 1982. This status update is in response to your March 23, 1982, memorandum in which you requested that FEMA conduct a field verification to assure that standard operating procedures (SOP's), communications equipment installation, and personnel training necessary for an effective offsite response have been completed.

In my April 22, 1982, memorandum to you, I stated that FEMA was preparing for the field verifications and projected a tentative completion date for the end of July 1982. Stone and Webster Engineering, the consultant preparing the offsite plans for both States, has not adhered to the schedule introduced into the hearing record and has been late submitting the SOP's, thereby creating delays in the FEMA Regional reviews. At this time, the SOP's have been received from Stone and Webster Engineering and have been initially reviewed by both FEMA Regions. Several deficiencies have been identified in the SOP's by both Regional Offices which will necessitate revisions by the States, counties, and Stone and Webster Engineering.

Due to delays encountered with Ohio, Kentucky, the counties, and Stone and Webster Engineering, it is now our intention to complete the field verifications prior to and during the next scheduled exercise at Zimmer on June 7-8, 1983. Personnel training and installation of communications equipment should be accomplished by the States in the next several months and will be reviewed and evaluated during the field verifications. Please note that the exercise was changed from November 1982 to June 1983 per request of the utility. This has afforded additional time to the States to respond to our requests.

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Both Regional Offices, in conjunction with Headquarters, are developing procedures to be used for the field verifications to ensure a uniform approach. This preparatory groundwork should be completed by the end of November 1982. FEMA has been proceeding in fulfillment of your March 3, 1982, request, however, there has been some difficulty interpreting the request in light of the ASLB Initial Decision announced on June 21, 1982. Since that decision does not say that the emergency preparedness completion schedule is relevant to granting a license (indeed, the decision does not even mention it), it is no longer clear what the objective is of conducting the field verification you requested. Conversely, several areas where emergency planning and preparedness around the Zimmer Nuclear Power Station were questioned in the decision are not part of the completion schedule even though they apparently must be improved before a license will be granted. Clarification of your request for field verification in light of the ASLB Initial Decision would greatly help us meet your needs.

Please advise as soon as possible on this matter. Every effort possible by FEMA will be made in the interim to address the outstanding offsite emergency preparedness issues.

Attachments

cc: Charles Barth
Stuart Treby
Office of the Executive Legal Director
U.S. Nuclear Regulatory Commission

NOV 3 1982

MEMORANDUM FOR: Assistant Associate Director, Office of Natural and
Technological Hazards

Attention: Msgr Hepler, Field Operations Branch


FROM: Chairman, Regional Assistance Committee

SUBJECT: Zimmer Standard Operating Procedures

In accordance with the initial decisions rendered by the Atomic Safety and Licensing Board (ASLB) and the Nuclear Regulatory Commission's (NRC) completion schedule, the attached review of the off-site Standard Operating Procedures (SOPs) for the Zimmer Nuclear Power Station was accomplished by Argonne National Laboratory. Mr. Robert Shapiro, FEMA Region V's project officer and "Expert Witness" for Zimmer, concurs with the Argonne findings.

This review has concluded that the SOPs are not acceptable and will require considerable modification before they could be considered adequate. Generally, they were found unacceptable because they did not totally respond to ASLS's initial decision. They are also poorly written, consequently these documents could possibly lead to a great deal of confusion. This confusion during an emergency response would directly affect the ability to protect the population should an emergency arise at Zimmer. Therefore, we classify this as a significant discrepancy since the welfare of the population could be adversely affected.

FEMA Region V will work closely with Ohio to resolve these problems; however, since there are so many significant problems it is difficult to establish a realistic date for which full acceptability of the planning effort can be realized. FEMA Region V will provide periodic progress reports.


Dan Bennett

Attachment

cc: RD
Mr. Finch

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