



BOSTON EDISON

Pilgrim Nuclear Power Station
Rocky Hill Road
Plymouth, Massachusetts 02360

February 1, 1991
BECo Ltr. #91-2.91008

George W. Davis
Senior Vice President - Nuclear

U.S. Nuclear Regulatory Commission
Attn: Document Control Clerk
Washington, D.C. 20555

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

Subject: Status of Boston Edison Commitments from BECo Ltr. #90.119 (10/4/90)

Dear Sir:

On October 4, 1990, Boston Edison provided a response to the NRC Staff's September 14, 1990 letter requesting information on the offsite emergency response program for Pilgrim Station (BECo Ltr 90.119). Boston Edison's letter provided an item by item response to allegations and concerns identified in the September 6, 1990 public meeting transcript and attachments. In addition, Boston Edison's letter also provided an item by item response to FEMA's August 27, 1990 "Final Exercise Assessment" on the October 12-13, 1989 exercise (as well as the May 25, 1990 remedial exercise). In each case, the item was quoted verbatim from the transcript, attachment, or FEMA report and assigned an item number according to source. Transcript items were designated "TR-___," transcript attachment items were designated "TR-A-___," and exercise items were designated "EX-___."

Boston Edison's October 4, 1990 letter identified actions which were underway to revise plans or procedures, provide equipment, or otherwise continue the ongoing planning process. Those actions were categorized as follows:

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

Acc 11 Add: NRR/REP/REP #1 Encl 11

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The purpose of this letter is to provide a status report on the items which were identified and scheduled for corrective action.

As set forth in Attachment A, there are 67 separate commitments reflected in our October 4, 1990 letter of which 16 have been fully closed. Actions taken to close these items are documented in our files which can be made available for your review. In addition, seven commitments required multiple actions for closure with different due dates. The individual actions due as of the date of this letter are complete. Remaining actions necessary to fully close these commitments will be subsequently completed as originally indicated. These seven commitments are listed as "partially closed" on Attachment A. The remaining 44 commitments are not yet due for closure.

If you should have any questions regarding the status of the items in the report, please feel free to contact our Emergency Preparedness Department Manager, Mr. Ronald Varley at (508) 747-9464.



G. W. Davis

/jlm
EOF3612
Attachments

cc: Mr. William T. Russell
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Thomas Murley
Director, Office of Nuclear Reactor
Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frank J. Congel
Director, Division of Radiation
Protection and Emergency Preparedness
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Washington, D.C.

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cc: (continued)

Mr. Steven A. Varga, Director
Division of Reactor Projects - I/III
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C.

Mr. Robert A. Erickson
Chief, Emergency Preparedness Branch
U.S. Nuclear Regulatory Commission
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Mr. D. J. McDonald
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Mr. Thomas T. Martin
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U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Mr. Richard Strome
Regional Director
Federal Emergency Management Agency
J. W. McCormack Post Office
& Court House
Boston, MA 02109

Status of Commitments from
BECo Ltr. #90.119 (October 4, 1990)
As of February 1, 1991

Commitments Closed

TR-10, 26, 31, 48, 84, 108

TR-A14-2, 14-9

EX-4, 8, 22, 59, 60, 61, 64, 70

Commitments Partially Closed

EX-14, 15, 16, 41, 42, 43, 44

Commitments Not Yet Due

TR-90, 100

TR-A28-3

EX-7, 9, 10, 11, 12, 13, 17, 18, 19, 20, 21, 23, 24, 25, 26, 27, 28, 29, 30,
31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 45, 46, 47, 48, 49, 50, 51, 52,
56, 62, 79, 80

Commitments Overdue

None

Attachment B

Relevant Excerpts from Boston Edison Ltr. #90.119

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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. Ty-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-31: "The school committee 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-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-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-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.

TOWN OF BRIDGEWATER

OFFICE OF SELECTMEN



Bridgewater, MA 02324

CAROLYN MORWICK, Chairman
ROGER P. PROVOST, Clerk
DAVID A. CANEPA, Member
(508) 697-0919

FRANK MAHER
Executive Secretary
(508) 697-0920

September 28, 1989

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.

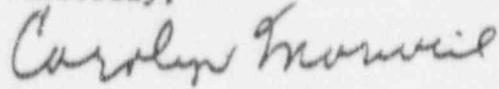
Mr. Boulay
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September 28, 1989

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,



Chairman, Board of Selectmen

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



TOWN OF BRIDGEWATER

OFFICE OF CIVIL DEFENSE

BRIDGEWATER, MASS. 02324

TELEPHONE (603) 697-6191

August 27, 1990

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

Dear Mr. Boulay:

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.

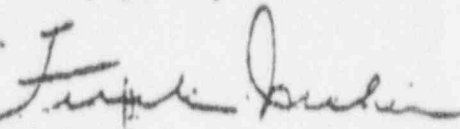
- Fire IOC Representative
- Fire Dispatcher
- Dosimetry Coordinator

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

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-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-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-A14-9:

"4. Require additional CDV-700's for EWMS."

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 (EWMS) 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-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. 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-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 Reunitification 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.

	<u>YES</u>	<u>NO</u>
1. Are the following Status Boards available?		
a. 5, 10, and 50 Mile Maps	<u>✓</u>	---
b. Press Kits (35)	<u>✓</u>	---
c. EAL Chart (1)	<u>✓</u>	---
2. Are the following pieces of equipment present?		
a. Telecopier (3) <u>2</u> Send a test page from each Telecopier to the EOF (746-7036). Request test pages from the EOF to (747-1031, 1032, 1033).	<u>✓</u>	---
b. Photocopier(1) Turn power on and copy test page.	<u>✓</u>	---
c. Typewriter (3)	<u>✓</u>	---
d. Word processor(1) Locate cabinet in back of closet. Remove and set-up word processor. Power up and locate a batch press release. Printout press release. Power down, disconnect, and store word processor.	<u>✓</u>	---
e. Television Sets (3) Set-up TV's. Turn on power, tune in channels 4, 5, and 7. Turn off and store.	<u>✓</u>	---
f. Public Address System Turn on power, adjust volume, talk into Microphone.	<u>✓</u>	---
g. PNPS ERO ID Badges (15)	<u>✓</u>	---

MEDIA CENTER SURVEILLANCE
Continued

	<u>YES</u>	<u>NO</u>
3. Is a controlled set of the following procedures available:		
a. PNPS Emergency Plan(1)	✓	_____
b. Emergency Communications Instructions (1)	✓	_____
c. FSAR (1) - <i>Concept</i>	<u>N/A</u>	_____
d. Recovery Procedures (3) - <i>Program discontinued</i>	<u>N/A</u>	_____
e. Emergency Notification List (3) <i>ETD</i>	✓	_____

Performed by: *Mark Dineen* Date 8-31-84

Reviewed by: *[Signature]* Date 9-7-84
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	COMPLETED
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

[Signature]

EX-15

MEDIA CENTER INVENTORY (Cont.)

	REQUIRED	INVENTORIED AMOUNT
3. Miscellaneous		
EPZ Map 10 Mile (mounted)	1 each	1
Events Status Board (mounted)	1 each	1
Emergency Classification Level Sign (mounted)	1 each	1
Wall File Holder - Single (mounted)	3 each	3
Wall File Holder - Triple (mounted)	1 each	1
Key Box (Mounted)	1 each	1
4. Documents (In Storage Room 1)		
EP-IP Procedure Set	1 each	1
PNPS Plan	1 each	1
EP-PI Procedure set	1 each	1
PNPS Emergency Telephone Directory	2 each	2
BECo Workroom		
5. Emergency Position Manuals (In Storage Room 1)		
Company Spokesperson	1 each	1
Media Center Supervisor	1 each	1
Agency Coordinator	1 each	1
Technical Advisor - Operations	1 each	1
Technical Advisor - Health Physics	1 each	1
Media Relations Coordinator	1 each	1
Media Assistants	1 each	1
Audio Visual Assistant	1 each	1
Media Center Administration Coordinator	1 each	1
Media Center Word Processor	1 each	1
Media Center Communicator	1 each	1
Media Center Duplication	1 each	1
Media Center Distribution	1 each	1
Media Center Historian	1 each	1
Commonwealth/Federal Workroom		
12 hour clock (mounted)	1 each	1
Events Status Board (mounted)	1 each	1
Sign-In Status Board (mounted)	1 each	1

EX-15

MEDIA CENTER INVENTORY (Cont.)

REQUIRED

INVENTORY AMOUNT

Town Workroom

- Tables 2' x 4"
- Folding Chairs
- 24 hour clock (mounted)
- Events Status Board (mounted)
- Sign-In Status Board (mounted)

- 6 each
- 8 each
- 1 each
- 1 each
- 1 each

6
8
1
1
1

Comments: _____

Inventory performed by: Robert E. Corbett

Date: 10/1/90

Inventory reviewed by: JW
Facilities and Equipment Division Manager

Date: 10/1/90

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-16

MEDIA CENTER CABINET B INVENTORY

Located In Storage Area I

<u>Item</u>		<u>Required Amount</u>	<u>Inventory Amount</u>
Padlock with keys		1 each	<u>1</u>
Typewriter	Model/Make <u>IAM</u>	4 each	<u>4</u>
Television	Model/Make <u>1-Sharp 19F75</u> <u>2-Plasma</u>	3 each	<u>3</u>
VCR	Model/Make <u>CT-1122</u> <u>Fisher FW4000</u>	1 each	<u>1</u>
Cassette Player	Model/Make <u>Belmont CTL 41</u>	1 each	<u>1</u>
Cassette tapes		6 each	<u>6</u> * 2 per 2K order
Marine I CB Radio	Model/Make <u>Benet 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> * GPC

Reviewed 10-1-40

[Handwritten initials]

No changes to this inventory sheet may be made without approval of the Onsite Emergency Preparedness Section Manager

Approved by:

[Handwritten 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: MOPH/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

EX-19



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 (ARCA) and some are Areas Requiring Further Improvement (ARFI). As you know, ARCA must be responded to, corrected, and demonstrated in the next FEMA evaluated exercise. ARFI 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."

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

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

ITEM	RECOMMENDED QUANTITY	SERIAL NUMBER	CALIBRATION DUE DATE	SAT	UNSAT
RO-2A (or Equivalent)	1				
E-140 (or Equivalent)	1	37462	6/4/90	✓	
HP-210 Probe (or Equivalent)	2	317/0457H	8/29/2190	✓	
Radeco Air Sampler (Battery)	1				X
TLD'S	3	DATE REPLACED:	4/16/89	✓	
Pocket dosimeters 0-500 mr	3	NA	3/90	✓	
SH-4 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	✓	

EMERGENCY OPERATIONS FACILITY
(MDPH MONITORING KIT) (2)

ITEM	RECOMMENDED QUANTITY	SERIAL NUMBER	CALIBRATION DUE DATE	SAT	UNSA :
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, ARCA, 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-26 "The Executive Order used in the remedial exercise used incorrect information concerning the host facility for students from Marshfield."

Source: FEM's 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. 55

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.

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."

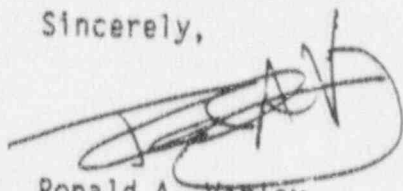
Suggested Corrective Actions:

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/jw1
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. Markovitch 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 1989 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 1989 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-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-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: MOPH/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: MOPH/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-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-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. 65

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-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