



# Federal Emergency Management Agency

Washington, D.C. 20472

Mr. Frank J. Congel  
Director, Division of Radiation Protection  
and Emergency Preparedness  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Congel:

In November 1990, the Atomic Safety and Licensing Appeal Board issued a decision which held, in part, that the graded exercise at the Seabrook site in 1988 was not sufficiently broad in scope to test the provisions of the New Hampshire Radiological Emergency Response Plan (NHRERP) as it pertained to notification of schools and day care centers of the existence of an emergency and recommended protective actions. Public Service Co. of New Hampshire (Seabrook Station, Units 1 and 2), ALAB-941, November 21, 1990. The Board also ruled that the "failure to elicit sufficient school participation in the June 1988 exercise should be corrected in a subsequent exercise." Id., slip opinion, at 26. This issue was addressed during the graded exercise of the offsite emergency preparedness at the Seabrook site held on December 13, 1990.

In this exercise, a portion of the overall demonstration in the New Hampshire portion of the Emergency Planning Zone (EPZ) involved Standard Objective 19 (approved by the Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency (FEMA)) which deals with protective actions for school children. FEMA considers "school children" to include both public and private school students and children in day care centers. The pre-exercise agreements between FEMA and the exercise participants are listed in sections 2.3 and 3.3 of the exercise scenario document. In summary, these agreements state that all 5 School Administrative Units (SAUs) in the New Hampshire EPZ were to participate fully and that the SAUs would make contact with the individual public and private schools in their jurisdictions. The exercise limitation was that these contacts would be stopped at the end of the normal work day.

The pre-exercise agreements also provided that all public and private schools in the New Hampshire EPZ were to be called by the SAUs and local Emergency Operations Centers (EOCs) and provide information on transportation needs as appropriate. The day care centers in the New Hampshire EPZ were to be contacted in accordance with the plan by both the State EOC Day Care Center Notification

Team and by the local EOCs, or the local IOC liaisons in the Incident Field Office (IFO) for compensatory communities. In accordance with the pre-exercise agreements, the State EOC contact was limited to a single "information only" initial notification. In addition to the notifications discussed above, all 5 SAUs and 10 of the day care centers were to be visited by a FEMA evaluator.

On December 14, 1990, the day after the exercise, telephone contacts were made with the schools and day care centers to verify the contacts which were made during the exercise. In accordance with the extent of play agreements, contacts were not made with the SAUs and day care centers which were visited by FEMA evaluators during the exercise. The results of FEMA's post-exercise contacts with the schools and day care centers in the New Hampshire portion of the Seabrook EPZ are summarized below:

1. Schools:

Based on lists provided by New Hampshire Yankee, there were 40 schools to be contacted. (Three private schools were inadvertently not included on the lists provided). In accordance with pre-exercise agreements, several attempts were made to contact schools. However, if at least 50% of the total calls attempted made contact, additional attempts to make contact with a particular number were stopped. Due to multiple busy signals or no answers, 3 of the schools were not contacted during the calling period and additional contacts were not attempted. All of the 37 schools contacted confirmed that they received at least 1 call from exercise participants.

2. Day Care Centers:

New Hampshire Yankee provided lists of day care centers tabulated by town or city. Based on the logs provided by the exercise participants, day care centers which were not contacted during the exercise (no answer, phone disconnected, or several busy signals) were eliminated from the listings and no attempt was made to contact those centers. There were 77 day care centers shown on the listings. (Two of the day care centers were inadvertently omitted from the listings.) Fifteen were eliminated on the basis either that they had already been visited during the exercise (and no further verification was necessary) or that no contact at all was made during the exercise (and there was nothing to verify). Attempts were made to contact the remaining 62 centers.

During the calling period, 8 centers were not contacted due to multiple busy signals or no answers. Of the remaining 54 day care centers contacted, 48 indicated that they were contacted at least

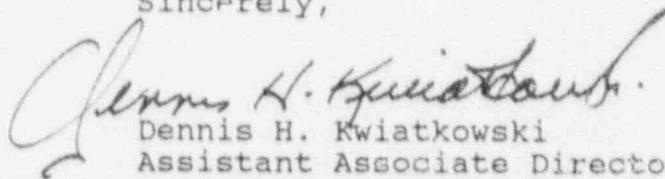
once by exercise participants. Three of the centers stated that they were not contacted, one stated that there was no one at home during the exercise, one stated that the person in charge was not available, and one stated that they were not participating at this time.

3. Conclusion:

The verification which FEMA conducted after the exercise established that at least 37 schools out of 40 and at least 48 day care centers out of 79 were contacted by participants during the exercise. This serves to confirm FEMA's judgment that the sample used in the 1990 Seabrook exercise was adequate to provide a reliable test of the provisions of the NHRERP relating to notification of public and private schools and day care centers.

FEMA's conclusions about the adequacy of the performance of the exercise participants will be forwarded at a later time, in our exercise evaluation report.

Sincerely,



Dennis H. Kwiatkowski  
Assistant Associate Director  
Office of Natural and Technological  
Hazards