UNITED STATES NUCLEAR REGULATORY COMMISSION REGION IV 611 RYAN PLAZA DRIVE, SUITE 400 ARLINGTON, TEXAS 76011 8064 MAY - 9 1994

Docket: 50-458 License: NPF-47

Entergy Operations, Inc.

ATTN: John R. McGaha, Vice President -Operations, River Bend Station

P.O. Box 220

St. Francisville, Louisiana 70775

SUBJECT: FEMA-IDENTIFIED DEFICIENCIES AT THE FEBRUARY 23, 1994, RIVER BEND

STATION EXERCISE

Enclosed is a letter from R. L. "Buddy" Young, Regional Director of the Federal Emergency Management Agency (FEMA) Region VI, dated March 7, 1994, officially notifying the State of Louisiana of deficiencies identified during the February 23, 1994 exercise with the River Bend Station.

There were two Deficiencies identified. The first deficiency involved protective action decisionmaking at the Pointe Coupee Parish EOC and not fication of the public via Emergency Broadcast System at the State Emergency Operations Center. The second deficiency involved an inadequate demonstration of several objectives at the Louisiana State University Reception Center.

Mr. Bill Smith of your organization was contacted concerning these deficiencies by Mr. Wes Holley of our staff. We request that your organization contact Mr. Blaine Murray of our staff when these deficiencies are corrected by the State of Louisiana.

If you have an questions concerning this letter, please contact Wes Holley at 817/860-8198.

Sincerely,

Samuel J. Collins, Director Division of Radiation Safety and Safeguards

Enclosure: As stated

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Entergy Operations, Inc.

cc w/o enclosure:
Entergy Operations, Inc.
ATTN: Harold W. Keiser, Executive Vice
President and Chief Operating Officer
P.O. Box 31995
Jackson, Mississippi 39286-1995

Entergy Operations, Inc.
ATTN: Jerrold G. Dewease, Vice President
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Entergy Operations, Inc. AITN: Michael B. Sellman, Plant Manager P.O. Box 220 St. Francisville, Louisiana 70775

Entergy Operations, Inc.
ATTN: James J. Fisicaro, Manager - Safety
Assessment and Quality Verification
River Bend Station
P.O. Box 220
St. Francisville, Louisiana 70775

Wise, Carter, Child & Caraway ATTN: Robert B. McGehee, Esq. P.O. Box 651 Jackson, Mississippi 39205

Winston & Strawn ATTN: Mark J. Wetterhahn, Esq. 1401 L Street, N.W. Washington, D.C. 20005-3502

Entergy Operations, Inc.
ATTN: Otto P. Bulich, Director
Nuclear Licensing
P.O. Box 220
St. Francisville, Louisiana 70775

The Honorable Richard P. Ieyoub Attorney General P.O. Box 94095 Baton Rouge, Louisiana 70804-9095

H. Anne Plettinger 3456 Villa Rose Drive Baton Rouge, Louisiana 70806 President of West Feliciana Police Jury P.O. Box 1921 St. Francisville, Louisiana 70775

Cajun Electric Power Coop. Inc. ATTN: Philip G. Harris 10719 Airline Highway P.O. Box 15540 Baton Rouge, Louisiana 70895

William H. Spell, Administrator Radiation Protection Division P.O. Box 82135 Baton Rouge, Louisiana 70884-2135

Chief, Technological Hazards Branch FEMA Region 6 Federal Center 800 North Loop 288 Denton, Texas 76201-3698 Entergy Operations, Inc.

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bcc to DMB (A045)

bcc distrib. by RIV w/letter dated March 7, 1994:
RB Resident Inspector
W. L. Holley, DRSS/FIPB
R. G. Schaff, NRR/PDIV1, NRR Project Manager (MS 13 H3)
RSTS Coordinator
FIPB File
RIV File

bcc w/o letter: L. J. Callan, RA MIS System C. A. Hackney, SLO R. Emch, NRR (MS 9 H15)

RIV:FIPBANT	C:FIPB THE	DD:DRSS	D:DRSS
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Federal Emergency Management Agency

Region VI Federal Regional Center 300 North Loop 288 Denton, TX 76201-3698

DT

March 7, 1994

Mr. William H. Spell Administrator Louisiana Dept. of Environmental Quality Radiation Protection Division P.O. Box 82135 Baton Rouge, LA 70884

Dear Mr. Spell:

As required by 44 CFR 350.9(d), this letter provides official notice that FEMA's evaluation of the February 23, 1994 Radiological Emergency Preparedness Exercise at River Bend Station (RBS), St. Francisville, Louisiana, identified two Deficiencies involving protective action decision making at the Pointe Coupee Parish EOC, notification of the public via EBS at the State EOC and inadequate demonstration of several objectives at the Louisiana State University (LSU) Reception Center. These Deficiencies are detailed in the following text.

As defined in FEMA-REP-14, Radiological Emergency Preparedness Exercise Manual, a Deficiency is defined as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that off-site emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

DEFICIENCY #1

The first Deficiency involved a Protective Action Recommendation (PAR) concurred with by the emergency organization of Points Coupee Parish, and the subsequent implementation of that Protective Action Decision (PAD) that included a modification that was not in agreement with the concurrence, or the EBS message that was broadcast. The FEMA exercise objectives affected are 9 (NUREG 0634, J.9 and 10.m), 10 (NUREG 0654, E.5,6,7) and 11 (NUREG 0654, E.5,7).

At 1:34 p.m., during the "Protective Action Conference", involving the State and all five EPZ Parishes, on the RBS hot-line, there was a conference between the Mayor of New Roads, the Pointe Coupee Parish Police Jury President and the Parish Emergency Management Director, regarding whether to concur with the PAR presented to the

conferees, "Scenario No. 20." It was agreed that they would concur. Scenario #20, Protective Action Recommendation states: "Evacuato 5-mile radius and, Evacuate 10-miles downwind and, shelter 10-mile radius and, Evacuate Schools, Institutions, Recreation Areas 10-Mile Radius. Page 2 of this scenario specifically states that Points Coupes Parish will evacuate PAS 16, 17, and 18 - 2-5 miles radius, and Schools located in the 10-mile radius in PAS-2, PAS-10, PAS-13, and PAS-18."

Schools and special facilities located in these areas include:

Big Cajun No. 2 (PAS 16), Big Cajun No.1 (PAS 17), Rougon Elementary School (PAS 17), Cajun Energy Control Center (PAS 18), Catholic Schools (PAS 18), Early Childhood Center (PAS 17), False River Academy (PAS 18), Kiddie Kingdom Preschool (PAS 18), Lakeview Manor Nursing Home (PAS 18), Memorial Area Vocational (PAS 18), Muckelroy's Playschool (PAS 18), New Roads Church School (PAS 18), PCP General Hospital (PAS 18), PCP Nursing Home (PAS 18), PCP State Park - Scott Center (PAS 18), Rosenwald Elementary School (PAS 18).

Despite their earlier concurrence with the above cited Protective Action Scenario No. 20, Pointe Coupee Parish EOC Officials elected to only notify and evacuate three of the 16 facilities, i.e., Big Cajun No. 1 and 2 and Rougon Elementary School, in addition to the two subdivisions, River Bend and Waterloo. As a result schools, institutions and recreation areas within a 10-mile radius were not evacuated, as required by Scenario No. 20.

The failure of the Parish to evacuate all schools, institutions and recreation areas in a 10-mile radius in accordance with Scenario #20, after they had concurred with LOEP, and after the public had been notified, via EBS, that the evacuation would be undertaken, could result in mass confusion and could jeopardize the health and safety of the public during a real event.

We recommend that the above described Deficiency be resolved in a remedial drill as follows:

- The following organizations will play in the remedial drill to the extent necessary to successfully demonstrate the implementation of a Protective Action Decision based upon a Protective Action Recommendation from the State (LRPD) and/or the utility:
 - LOEP

 - c. Entergy Operations, Inc. @ RBS
 - d. Pointe Coupee Parish EOC
 - e. EBS station

- All of the above mentioned organizations will staff their EOC/EOF to the level necessary to perform all functions and actions called for in the plans and procedures for the implementation of the PAD.
- The PAD will be such that a prescripted scenario will require a modification to be determined by the authorities in Pointe Coupee Parish.

DEFICIENCY #2

The second Deficiency occurred at the LSU Reception Center. The Reception Center was to demonstrate FEMA objectives 1, 4, 5, 18, 19 and JO. Objectives 4 and 19 were satisfactorily demonstrated. Objectives 1, 5, 18 and 30 will have to be redemonstrated in a remedial drill.

Areas of concern that contributed to the Deficiency are as follows:

Some staff members were pre-positioned

Some staff positions were not manned either on the first shift or the second shift. Continuous 24-hour operations was an objective (objective 30) which requires a shift change of all *ssential positions.

The facility was not properly set up to adequately

prevent cross contamination.

There were insufficient supplies available to the

emergency workers such as gloves, booties, etc.

The emergency workers lacked the proper knowledge in emergency worker exposure control, decontamination procedures, contamination control and proper monitoring technique.

The Reception Center Manager, and the University Security personnel who provide traffic control around the R/C

facility were late in arriving.

Other activities occurring at the LSU Field House contributed to a sense of general chaos during the demonstration.

Shift Change briefings between outgoing and incoming shifts were inadequate for all participating organizations except the American Red Cross and the Division of Family Services.

FEMA Region VI believes that this deficiency can be resolved by additional training for both shifts to assure that they can fulfill their emergency responsibilities at the Reception Center, demonstration of adequate staffing for two 12-hour shifts, and the stocking of adequate supplies and equipment for use by the emergency workers.

The two Deficiencies cited will require that a remedial drill be conducted within 120 days of the February 23, 1994 exercise at both these locations.

You are requested to provide a written response to this notice of Deficiencies by March 23, 1994, outlining the schedule of proposed corrective actions that will be undertaken to resolve these issues. If you feel that a conference call is necessary to discuss these problems, please advise me in your response.

If you have any questions, please contact Gary Jones, Region VI RAC Chairman.

Jenestine Religy
Regional Directoring

Dennis Kwiatkowski, FEMA HQ Charles Hackney, NRC William J. Croft, LOEP Bill Smith, Entergy Operations Craig Fiore, FEMA HQ

bcc to DMB (A045)

bcc distrib. by RIV w/letter dated March 7, 1994:
RB Resident Inspector
W. L. Holley. DRSS/FIPB
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RSTS Coordinator
FIPB File
RIV File

bcc w/o letter: L. J. Callan, RA MIS System C. A. Hackney, SLO R. Emch, NRR (MS 9 H15)

RIV:FIP8 AND	C:FIPB THE	DD:DRSS	D:DRSS	
WLHolley:nh	BMurray		SJCøllins	
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