

DOCKETED
USNRCUNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSIONBefore the Atomic Safety and Licensing Board

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OFFICE OF SECRETARY
NUCLEAR REGULATORY COMMISSION

In the Matter of)

LONG ISLAND LIGHTING COMPANY)

(Shoreham Nuclear Power Station,
Unit 1))Docket No. 50-322-OL-3
(Emergency Planning)SUFFOLK COUNTY MOTION TO COMPEL DISCOVERY

On August 23, 1983, Suffolk County filed notices of deposition for Richard Krimm, Jeffrey Bragg, and Gary Johnson. The depositions were noticed for September 21 and 22. Each of these gentlemen is employed by the Federal Emergency Management Agency ("FEMA") and has been identified in discovery responses as having reviewed the LILCO Transition Plan. Although no motion for a protective order has been filed by FEMA, the County's counsel have been informed by FEMA's regional counsel that these gentlemen will not appear voluntarily. See Exhibit 1. Accordingly, the County is required to file the instant motion.

Relevance. There can be no dispute that the depositions seek relevant data. FEMA exercises the principal role in NRC proceedings concerning review and approval of offsite emergency response plans. See 10 CFR §50.47(a)(2). FEMA's role in the instant proceeding may be even more important than in other cases, since FEMA for the first time is assessing the adequacy of a

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utility offsite plan. That LILCO plan does not have governmental support.

In the instant case, it is essential to depose each of the noted FEMA reviewers. Messrs. Krimm, Bragg and Johnson have each participated personally in the FEMA review of the LILCO Transition Plan. See Exhibit 2, p. 2. Further, it was Mr. Krimm who transmitted FEMA's June 23 "Findings" to the NRC. See Exhibit 3. It was Mr. Bragg to whom Mr. Dircks of the NRC Staff directed inquiries to clarify FEMA's June 23 Findings, and Mr. Bragg responded in a letter dated August 29, 1983. See Exhibits 4 and 5. Mr. Johnson was one of the FEMA persons involved in FEMA's use of Argonne National Laboratory to review the LILCO Transition Plan. See Exhibit 6, pp. 3-4. Finally, it is the County's understanding that each of these gentlemen has played a central role in determining how FEMA would conduct its review of the LILCO Transition Plan -- a review which has not followed FEMA's normal "350" process. See Exhibit 3.

FEMA Objection. FEMA takes the position that Messrs. Krimm, Bragg and Johnson do not need to be produced for deposition because they are protected by 10 CFR §2.720(h)(2)(i). That regulation provides that "the Commissioners and named NRC personnel" cannot be forced to be deposed absent a showing of "exceptional circumstances." (emphasis supplied). FEMA's counsel states that these FEMA personnel "are entitled to the same protection as provided NRC personnel as stated in 10 CFR 2.720(h)(2)(i)." Exhibit 1.

There is no legal basis for this FEMA objection. The regulation protects "named NRC personnel" from deposition. Messrs. Krimm, Bragg and Johnson are not "NRC personnel" or consultants retained by the NRC.^{1/} FEMA is an independent agency -- not a part of the NRC -- which is performing emergency planning review functions pursuant to an inter-agency Memorandum of Understanding. See 45 Fed. Reg. 82713. FEMA has agreed to review offsite emergency response plans and to "make expert witnesses available" Memorandum of Understanding, §III.A. There is obviously nothing in the Memorandum of Understanding, however, or in the NRC rules which can be said to transform FEMA personnel into NRC personnel for discovery purposes or anything else. Similarly, there is nothing in the Memorandum or the NRC's rules that "entitles" FEMA personnel to the protection of Section 2.720(h)(2)(i). Accordingly, there is no basis for FEMA to assert that 10 CFR §2.720(h)(2)(i) applies to the FEMA personnel whose depositions have been noticed.

From oral discussions with FEMA counsel, the County understands that FEMA is concerned about the potential burden which might be experienced if persons such as Messrs. Krimm, Bragg and Johnson were to be deposed.^{2/} FEMA apparently fears that

^{1/} Section 2.720(h)(2)(i) also protects the Staff's consultants from deposition. See 10 CFR Part 2, Appendix A, §IV(d).

^{2/} Mr. Krimm is an Assistant Associate Director of FEMA. Mr. Bragg is FEMA's Executive Deputy Director. Mr. Johnson is a FEMA Executive Officer in the Office of Natural and Technological Hazards Programs.

if it produces these persons in the Shoreham proceeding, it might be forced to produce them in other cases as well, resulting in these persons being unable to perform their normal work. The Board should reject this "reason." Whatever may be a Licensing Board's ruling in another case, the fact is that these three FEMA employees have been centrally involved as reviewers in this case. The Board is not facing a "fishing" expedition here, but is instead being asked by FEMA to shield from inquiry the very persons who hold personal knowledge which is essential to the County's preparation of its case.^{3/}

FEMA also takes the position that it is sufficient for the County to depose only those persons whom FEMA will be providing to testify at trial -- Messrs. Tanzman (of Argonne National Laboratory), Kowieski (of the FEMA Region II office), and Sharrocks (of FEMA's Washington, D.C. office). The County does intend to depose these proposed FEMA witnesses (their depositions are scheduled for September 12 and 13) because they are important reviewers of the LILCO plan, just as are Messrs. Krimm, Bragg and Johnson. This is no substitute for deposing any of these persons.^{4/}

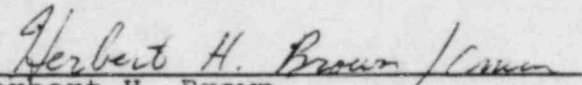
^{3/} The County notes that it expects the depositions to be relatively short -- a best estimate of a half day for each person. This is hardly a great burden given the significant personal role the FEMA employees had in reviewing LILCO's plan and the hardships which the County would experience in being denied access to the information these persons possess.

^{4/} The need to depose Messrs. Krimm and Bragg is particularly great since only Mr. Krimm can state with authority what he meant in the June 23 FEMA Memorandum (Exhibit 3 hereto) and only Mr. Bragg can state his reasons and intentions regarding his response to Mr. Dircks' letter (Exhibits 4 and 5 hereto).

For the foregoing reasons, Suffolk County respectfully
moves this Board to grant the instant motion.

Respectfully submitted,

David J. Gilmartin
Patricia A. Dempsey
Suffolk County Department of Law
Veterans Memorial Highway
Hauppauge, New York 11788


Herbert H. Brown
Lawrence Coe Lanpher
Karla J. Letsche
KIRKPATRICK, LOCKHART, HILL,
CHRISTOPHER & PHILLIPS
1900 M Street, N.W., Suite 800
Washington, D.C. 20036

September 7, 1983

Attorneys for Suffolk County



Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

2 SEP 1983

Karla J. Letsche, Esq.
Kirkpatrick, Lockhart, Hill
Christopher & Phillips
1900 M. Street, N.W.
Washington, D.C. 20036

Dear Ms. Letsche:

We are in receipt of your Notice of Deposition for Richard Krimm, Jeffrey Bragg and Gary Johnson. As you discussed with Bernie Bordenick on August 23th and as reiterated in our conference call on Tuesday, August 30th we are of the position that we have complied with the requirements of 2.720 (h) (2) (i).

As you are aware, the FEMA witnesses are appearing before the ASLB pursuant to the terms of the NRC/FEMA Memorandum of Understanding. We have already agreed to make our witnesses Roger Kowleski, Edward Tanzman and Frederick Sharrocks available for deposition on September 12th and 13th.

The additional individuals that you have requested to depose. Jeffrey Bragg, Executive Deputy Director; Richard Krimm, Assistant Associate Director; and Gary Johnson, Executive Officer are entitled to the same protection as provided NRC personnel as stated in 10 CFR 2.720 (h) (2) (i). We therefore respectfully decline to produce these members of our agency's senior executive staff.

Very truly yours,

Stewart M. Glass
Regional Counsel



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

August 5, 1983

John E. Birkenheier, Esq.
Kirkpatrick, Lockhart, Hill
Christopher & Phillips
1900 M Street, N.W.
Washington, D.C. 20036

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322 (Emergency Planning)

Dear Mr. Birkenheier:

This is in reply to your letters of July 27, 1983, and August 2, 1983, which enclosed a list of sixteen informal discovery requests to the Staff.* Set out below are the Staff's responses to your informal requests which have been provided to me. As to the first eight requests, with the exception of items 5 and 6 I gave you these responses over the telephone on July 29, 1983. I gave you most of item 5 on August 3, 1983. I gave verbal responses to items 9-16 to you by telephone on August 3, 1983.

1. The Staff presently expects to call the following named persons as witnesses during the Shoreham emergency planning hearings.

<u>Witness</u>	<u>Subject matter</u>
John R. Sears	Onsite emergency preparedness as it interfaces with offsite planners
Thomas Urbanik, II	Evacuation Time Estimate Analysis

* In order to expedite this proceeding and to continue the long standing spirit of cooperation between the Staff and Suffolk County with respect to discovery matters, the Staff agrees to treat the County letters as informal discovery requests. The Staff's voluntary response to the County's requests should not, however, be construed as a Staff acknowledgement that the County discovery requests in any way comply with the provisions of 10 C.F.R. § 2.720(h)(2)(ii) or § 2.744 as regards discovery against the Staff.

2. Thomas Urbanik, II, is a consultant retained by a Staff consultant (Battelle) to perform an Evacuation Time Estimate Analysis. Mr. Urbanik is from the Texas Transportation Institute of the University of Texas (College Station, Texas). See also 4 below.
3. To date there are no NRC staff evaluations etc. of the LILCO Transition Plan. The criteria which will be used to evaluate the Plan are set out in NUREG-0654, a copy of which I believe the County has in its possession.
4. Attached find copy of a letter dated December 2, 1982 from Thomas Urbanik, II, identified above, to John Sears, also identified above. (This was telecopied to you on August 3, 1983).
5. The Staff presently expects to call the following named FEMA (or contractor) witnesses as a panel to testify to whatever contentions are admitted in the Shoreham proceeding which relate to FEMA.
 - A. Roger B. Kowieski - FEMA Region 2,
Radiological Assistance Committee Chairman
 - B. Fred Sharrocks - FEMA, Washington, D.C.
Emergency Management Offices
 - C. Edward Tanzman
Argonne National Laboratory
6. Argonne National Laboratory Personnel who reviewed the LILCO Transition Plan.

Edward Tanzman
Chris Saricks
Kenneth Lerner
Phyllis Becherman
James H. Opelka

FEMA personnel who reviewed the LILCO Transition Plan.

Headquarters

Richard Krumm
Jeffrey Bragg
George Jett
Gary Johnson
Fred Sharrocks
Spence Perry

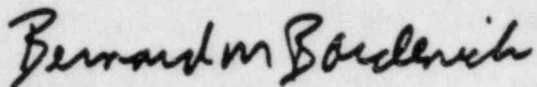
Region II

Roger Kowieski
Stewart Glass
Frank Petrone
Phil McIntire

- 7 and 8. The Staff is presently defining the scope of work for review of the recently submitted Shoreham PRA and expects to have this task completed by the end of August. This task is being performed by Edward Chow of the Staff. A schedule for completion of the review has not yet been finalized. It is presently anticipated that the review will require six to twelve months to complete. It has not yet been decided who the review contractor will be for the Staff. As you are no doubt aware, the Staff does not view the PRA as a prerequisite for the licensing of Shoreham. (See generally the record compiled with regard to SC-SOC Contention 7B).
9. See 4 above. In addition Battelle is preparing a comparison of the range of evacuation time estimates, including Shoreham, based on input from Mr. Urbanik. I will provide further information on this next week.
10. John R. Sears
11. Mr. Urbanik is a subcontractor for Battelle who works independently. His contact at Battelle is Art Desrusiers.
12. See 14 below.
13. Mr. Urbanik is not under contract to the NRC. (In any event I fail to see the relevance of this request to any potential County contention.)
14. Mr. Urbanik has testified at hearings in Allens Creek, Indian Point, Byron, Waterford, Diablo Canyon, Zimmer, Three Mile Island, and Fermi. He also prefled testimony at Comanche Peak. We are checking on the dates of such testimony. In any event, this information may be obtained at the Commission's Public Document Room.

15 and 16. See attached Biographical Data for Mr. Urbanik which responds to your requests (Telecopy was sent to you on August 3, 1983).

Sincerely,

A handwritten signature in dark ink, reading "Bernard M. Bordenick". The signature is written in a cursive style with a large, prominent "B" and "M".

Bernard M. Bordenick
Counsel for NRC Staff

Enclosures:
As Stated

cc: (w/enclosures and
incoming)
James N. Chrisman, Esq.
Stewart Glass



Federal Emergency Management Agency

Washington, D.C. 20472

JUN 23 1983

MEMORANDUM FOR: Edward L. Jordan
Director, Division of Emergency
Preparedness and Engineering Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

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

SUBJECT: Findings on the LILCO Transition Plan As Requested by
the NRC as Part of NRC Licensing of the Shoreham
Nuclear Power Station

This is in response to your June 1, 1983, memorandum in which you invoked Section II.4 of the November 1, 1980, NRC/FEMA Memorandum of Understanding by requesting the Federal Emergency Management Agency (FEMA) to provide the Nuclear Regulatory Commission (NRC) with findings and determinations as to whether the LILCO-County plan and/or the interim plans for the Shoreham Nuclear Station are adequate and capable of implementation. As a result of an Atomic Safety and Licensing Board (ASLB) order, your subsequent memorandum of June 17, 1983, requested that FEMA provide findings and determinations on the LILCO Transition Plan as a first priority. This Plan, developed wholly by LILCO, proposes to use LILCO personnel to carry out the offsite preparedness aspects of the plan (to include the total direction and control function) in the case of an emergency involving an accident at the Shoreham Nuclear Power Station.

First, we would like to indicate how the review process for the LILCO Transition Plan differed from the usual "350" approval process. As you know, under normal processing, the plan review is initiated by a formal request by the Governor of the State in which the nuclear facility is located, after he/she has received and analyzed plans submitted by the local governments in the emergency planning zone surrounding the facility. The request includes the State plan which is site-specific to the applicable power facility, appropriate local plans and a statement by the Governor that the State plan, together with the local plans, are adequate to protect public health and safety of the citizens living within the emergency planning zones for the nuclear power facilities included in the submission by providing reasonable assurance that appropriate protective measures can and will be taken in the event of a radiological emergency for the site. The FEMA processing of a Governor's submittal includes extensive review by the relevant Regional Assistance Committee (RAC), a public meeting and most importantly, a drill or exercise, including all appropriate governments, to test whether the plan can be implemented.

In contrast to the process described above, the LILCO Transition Plan was submitted, without Suffolk County or New York State endorsement, directly to FEMA Headquarters through the NRC for review under the terms of the NRC/FEMA Memorandum of Understanding. Because the Plan was not submitted under 44 CFR 350, a RAC review was not undertaken. For this reason, coupled with the fact that the NRC needed a FEMA finding within three weeks, it was necessary to obtain the support of Argonne National Laboratories to assist and perform a technical review of the plan against the 16 planning standards and criteria (A-P) listed in NUREG-0654/FEMA-REP-1, Rev. 1. FEMA Headquarters, assisted by FEMA's Region II Regional Director and staff, directed this technical review.

FEMA finds that the LILCO Transition Plan has 34 inadequacies in terms of NUREG-0654/FEMA-REP-1, Rev. 1. Our analysis relating these inadequacies to the various criteria is attached.

There are two preconditions, identified below, that need to be met for a FEMA finding as to whether the plan is capable of being implemented and whether LILCO has the ability to implement the plan.

- (1) A determination of whether LILCO has the appropriate legal authority to assume management and implementation of an offsite emergency response plan.
- (2) A demonstration through a full-scale exercise that LILCO has the ability to implement an offsite plan that has been found to be adequate.

FEMA will continue to review the other plans associated with your June 1 request in anticipation that the ASLB will require FEMA findings on these plans at a later date.

Attachment
As Stated

JUL 22 1983

Mr. Jeffrey S. Bragg
Executive Deputy Director
Federal Emergency Management Agency
500 C Street, S.W.
Washington, D.C. 20472

Dear Mr. Bragg:

On June 23, 1983, your agency reported to the NRC the results of your review of the LILCO Transition Plan for the Shoreham Nuclear Power Station. In your report you found 34 inadequacies in the plan in terms of NUREG-0654/FEMA-REP-1, Rev. 1, and in addition, set forth two preconditions that had to be met for there to be a FEMA finding on whether the Transition Plan was implementable and whether LILCO had the ability to implement the plan. These preconditions involved a determination as to the legal authority of the utility to manage and implement the plan, and a need for a full scale exercise to demonstrate an ability to implement the plan.

We recognize that a full scale exercise must be conducted to demonstrate LILCO's ability to implement the plan before it can be authorized to operate the Shoreham facility in excess of five percent of rated power. However, it is unclear from a reading of your report as to what FEMA's views would be as to the adequacy of the Transition Plan if the preconditions were removed and the 34 inadequacies were corrected. Specifically, would FEMA find the Transition Plan acceptable if these encumbrances were removed?

In order for us to have a better understanding of FEMA's views in this regard, I would appreciate your advice as to whether FEMA would find that there exists reasonable assurance that the LILCO Transition Plan, as written, is adequate and capable of implementation if the noted inadequacies were cured and there existed no question of legal authority to carry out the plan.

Thank you very much for your attention to this matter.

Sincerely,

William J. Dircks

William J. Dircks
Executive Director for Operations



Federal Emergency Management Agency

Washington, D.C. 20472

August 29, 1983

Mr. William J. Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Dircks:

This is in response to your July 22, 1983, letter requesting the Federal Emergency Management Agency (FEMA) to provide additional information concerning our report to the Nuclear Regulatory Commission (NRC) of June 23, 1983, entitled "Findings on the LILCO Transition Plan as requested by the NRC as Part of NRC Licensing of the Shoreham Nuclear Power Station."

Generally, for any non-governmental plan submitted to us for review, our position will be:

1. The plan could be considered adequate, if there are no deficiencies when the plan is reviewed against the NUREG-0654/FEMA-REP-1 standards.
2. The plan could be implemented, if the organization or persons required to implement planned actions have the authority to do so.
3. FEMA, in its advisory role to NRC, could make a finding that there is reasonable assurance that offsite preparedness is adequate, if a full scale exercise demonstrates that, with the authority and resources, the plan can be carried out effectively.

Specifically with respect to our June 23 report:

- o If the NRC requests, we will review the revised LILCO Transition Plan against the standards and criteria in NUREG-0654/FEMA-REP-1, and if we find that the 34 previously identified deficiencies are corrected, we could certify to the adequacy of the plan.
- o If LILCO is given the authority to perform response roles of Suffolk County personnel, and there is an exercise in which this is demonstrated, FEMA, in its advisory role to the NRC, could make a finding that offsite preparedness is adequate to protect the public living in the vicinity of the Shoreham plant.

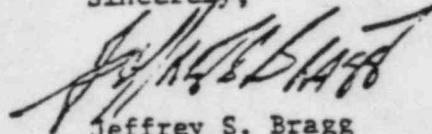
With regard to the first point, because of the short time that NRC allowed for the FEMA review of the LILCO Transition Plan we had to modify our procedure and not use the Regional Assistance Committee (RAC). If NRC requests a further review of the LILCO Plan, and there is adequate time, we would want to use the services of the RAC.

I also want to emphasize again that there is a real need to resolve the issue of LILCO's legal authority to act in accordance with the plan either in an exercise or during an actual emergency. This problem is one that can be resolved by the State of New York.

FEMA's preference, in any case, is to gain the active participation of State and local governments in the emergency planning and preparedness process related to Shoreham. Perhaps the diesel generator problem at Shoreham will provide more time for the State and Suffolk County to work out the offsite emergency preparedness problem.

This should clarify FEMA's views. Please do not hesitate to contact me if I can be of further assistance.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jeffrey S. Bragg", written over a horizontal line.

Jeffrey S. Bragg
Executive Deputy Director



Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

Karla J. Letsche, Esq.
Kirkpatrick, Lockhart, Hill
Christopher & Phillips
1900 M. Street, N.W.
Washington, D.C. 20036

FEMA's Response to Suffolk County's
Informal Discovery Request

Dear Ms. Letsche:

Enclosed please find FEMA's responses to Suffolk County's Informal Discovery Request (Interrogatories) to FEMA of August 12, 1983. We will attempt to provide all the documents as requested in your document request of the same date by September 7, 1983.

Please do not hesitate to telephone if you have any further questions regarding these discovery requests.

Very truly yours,

Stewart M. Glass
Regional Counsel

cc: Bernard M. Bordenick, Esq.
Stephen B. Latham, Esq.
Ralph Shapiro, Esq.
James Dougherty, Esq.
Howard L. Blau
Spence W. Perry, Esq.
James Christman

PART II - FEMA

1. Identify the subject areas upon which each of the following FEMA witnesses identified by the NRC will be testifying before the ASLB in this case:

- (a) Roger B. Kowieski
- (b) Frederick H. Sharrocks
- (c) Edward A. Tanzman

Response 1.

- (a) Roger B. Kowieski will testify as to the experiences of the Radiological Emergency Preparedness Program in Region II.
 - (b) Frederick H. Sharrocks will testify as to FEMA Headquarters role in the review of the LILCO Transition Plan.
 - (c) Edward A. Tanzman will testify as to the review of the Shoreham/LILCO Transition Plan for local offsite Radiological Emergency Response as conducted by the Energy and Environmental Systems Division of the Argonne National Laboratory.
2. Identify the date, location and proceeding of all prior testimony given by any of the witnesses identified in Request 1 before any judicial, administrative or legislative body.

Response 2.

- (a) Roger B. Kowieski testified before the Atomic Safety and Licensing Board on the Radiological Emergency Response Plan for Indian Point (Units 2 & 3)
 - (b) Neither, Frederick Sharrocks or Edward Tanzman have previously testified before any judicial administrative or legislative body.
3. Identify the positions with Argonne National Laboratory ("Argonne") or FEMA held by the following persons:
 - (a) Chris Saricks
 - (b) Kenneth Lerner
 - (c) Phyllis Becherman
 - (d) James H. Opelka
 - (e) Gary Johnson
 - (f) Richard Krimm
 - (g) Jeffrey Bragg
 - (h) George Jett
 - (i) Spence Perry
 - (j) Frank Petrone
 - (k) Phil McIntire

Response 3.

- (a) Christopher L. Saricks
Transportation Systems Planner
Energy Resource Analysis
Center for Transportation Research
Energy & Environmental System Division
Argonne National Laboratory
- (b) Ken Lerner
Research Attorney
Economic & Social Sciences Division
Energy & Environmental Systems Division
Argonne National Laboratory
- (c) Phyllis P. Becherman
Assistant Environmental Systems Engineer
Energy & Environmental Systems Division
Argonne National Laboratory
Washington, D.C.
- (d) James H. Opelka
Nuclear Physicist
Argonne National Laboratory
- (e) Gary Johnson
Executive Officer
Office of Natural and Technological
Hazards Programs
- (f) Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs
- (g) Jeffrey Bragg
Executive Deputy Director
Federal Emergency Management Agency
- (h) George Jett
General Counsel
Federal Emergency Management Agency
- (i) Spence Perry
Associate General Counsel
Federal Emergency Management Agency
- (j) Frank P. Petrone
Regional Director
Region II
Federal Emergency Management Agency

- (k) Philip McIntire
Chief, Natural and Technological Hazards Division
Region II
Federal Emergency Management Agency
- (l) Margaret Singh
Assistant Environmental Scientist
Center for Transportation Research
Energy and Environmental Systems Division
Argonne National Laboratory
- (m) Susan Viessman
Summer Research Assistant
Argonne National Laboratory
(preliminary research)

4. Other than the persons and entities identified in Mr. Bordenick's letter of August 5, 1983, identify any other consultants which FEMA has retained or intends to retain to review, analyze, or comment in any manner on the LILCO Transition Plan or any other offsite emergency plan for the Shoreham plant. What is the schedule for any such reviews, analyses or comments?

Response 4.

No other consultants are presently under consideration to review, or comment on the LILCO Transition Plan.

5. Identify all studies, reviews, analyses or other such tasks, if any, that Thomas Urbanik has conducted for FEMA, either directly or indirectly as a subcontractor.

Response 5.

Mr. Urbanik has not been under contract to FEMA for any work relating to the REP Program.

6. Does FEMA intend to review Revision I of the LILCO Transition Plan? If yes, describe the schedule for such review, and identify the person or persons who will conduct the review.

Response 6.

FEMA has not received a request to review Revision I of the LILCO Transition Plan from the NRC. Under Section II.4 of the November 1, 1980, NRC/FEMA Memorandum of Understanding the NRC can request such a review. The FEMA/NRC steering committee will determine if such a review will be undertaken and if it is to be undertaken FEMA will at that time determine who will conduct the review.

7. Identify the FEMA personnel who requested, directed, or supervised the Argonne review of the LILCO Transition Plan.

Response 7.

- Gary Johnson
Executive Officer
Office of Natural and Technological
Hazards Programs
- Craig Wingo
Chief, Field Operations Branch
Technological Hazards Division
Federal Emergency Management Agency Headquarters
- Frederick Sharrocks, Jr.
Senior Program Manager
Technological Hazards Division
Federal Emergency Management Agency Headquarters

8. Describe the subject areas of concentration and division of responsibilities, if any, of each of the Argonne reviewers of the LILCO Transition Plan.

Response 8.

The following is a summarization of the Shoreham plan review assignments.

- ° Assignment of Responsibility - Ed Tanzman
- ° Emergency Response Support and Resource - Ed Tanzman
- ° Emergency Classification System - Jim Opelka
- ° Notification Methods and Procedures - Ken Lerner
- ° Emergency Communications - Ken Lerner
- ° Public Education and Information - Phyllis Becherman
- ° Emergency Facilities and Equipment - Ken Lerner
- ° Accident Assessment - Jim Opelka
- ° Protective Response - Margaret Singh, Chris Saricks
- ° Radiological Exposure Control - Jim Opelka
- ° Medical and Public Health Support - Jim Opelka
- ° Recovery and Reentry Planning and Postaccident Operation - Phyllis Becherman
- ° Exercises and Drills - Phyllis Becherman
- ° Radiological Emergency Response Training - Phyllis Becherman
- ° Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans - Phyllis Becherman
- ° Editing - Donna Kenski

9. Describe the division of responsibility, and subject areas of concentration, if any, of each of the FEMA reviewers who reviewed:

- (a) the LILCO Transition Plan
- (b) the Argonne review of the LILCO Transition Plan

Response 9.

FEMA Headquarters review primarily consisted of reviewing the effort performed by its contractor "Argonne National Laboratory" because of severe time constraints. Fred Sharrocks, Senior Project Manager, was responsible for this review.

Craig Wingo and Gary Johnson reviewed the effort performed by Sharrocks.