



Federal Emergency Management Agency

Washington, D.C. 20472

50-341

JUL 18 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: Supplemental Interim Finding on Offsite Radiological
Emergency Planning and Preparedness at the Enrico Fermi
Atomic Power Plant, Unit II

This memorandum is in response to your April 13, 1983, request for clarification of our February 28, 1983, Fermi-II Supplemental Interim Finding, specifically relating to three offsite radiological emergency planning and preparedness issues. These issues relate to the boundaries of the plume exposure pathway Emergency Planning Zone around Fermi-II, the timeliness for providing protective action recommendations to the public, and training for local emergency response personnel.

The attached report provides additional information on these issues and considers comments by Mr. John R. Minock, Attorney for Citizens for Employment and Energy, and comments from Ms. Joan Mumaw and Mr. Michael Barrett, intervenors from Ida, Michigan.

Attachment



Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

JUNE 17, 1983

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

Attention: Megs Hepler, Field Operations Branch

FROM: Acting Chief, Technological Hazards Branch

SUBJECT: Request for Assistance Concerning Emergency Preparedness Issues at Fermi II

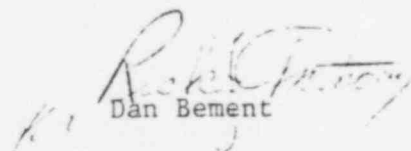
The purpose of this memorandum is to respond to your letter dated April 26, 1983, and Mr. Jordan's memorandum of March 3, 1983, April 13, 1983, and May 23, 1983, regarding this same subject.

Mr. Jordan's memorandum of March 3, 1983, requested our review and comments concerning assertions derived from Monroe County's petition to intervene as summarized by the Atomic Safety and Licensing Appeal Board. An earlier draft reflecting the results of our review was transmitted to you by our memorandum of April 20, 1983. Further examination of our earlier response, which included discussions with Mr. Falk Kantor of the NRC staff, has caused some modification to clarify points. Therefore, our response included as Attachment 1 to this memorandum supersedes the April 20th draft, which is to be disregarded.

Mr. Jordan's memorandum of April 13, 1983, transmitted a listing of five factors in which NRC shares concern and/or interest with FEMA. The concerns are discussed in Attachment 2 of this memorandum.

Mr. Jordan's memorandum of May 23, 1983, transmitted a listing of citizens' concerns regarding the proposed radiological emergency response plan for Monroe County. The listing was compiled by the intervenors Mike Barrett and Joan Mumaw and addresses, for the most part, concerns stated during the Monroe County Board's public meeting of June 16, 1982. There is distinct similarity to concerns posed to the ASLAB by Monroe County in its petition to intervene. In several instances our response to the intervenors' concerns, which is Attachment 3 to this memorandum, are referenced to our responses to the ASLAB's queries in Attachment 1.

In all the attachments our responses are numerically identified in correlation to the query document.


Dan Bement

Attachments

FEMA RESPONSE TO NRC STAFF COMMENTS

1. Size of the Plume Exposure Pathway Emergency Planning Zone.

FEMA Region V agrees the single most important element of emergency planning is the definition of the area over which planning for predetermined actions should be carried out. The need for this specification of areas for the major exposure pathway is evident. The location of the population for whom protective measures may be needed, responsible authorities who would carry out protective actions and the means of communication to these authorities and the population are all dependent on the characteristics of the planning area.

Also, we recognize the choice of the size of the EPZ represents a judgment on the extent of detailed planning which must be performed to assure an adequate response base. In a particular emergency, protective actions might well be restricted to a small part of the planning zones. On the other hand, for the worst possible accident, protective actions might need to be taken outside the planning zone. Although the radius for the EPZ implies a circular area, the actual shape would depend upon considerations involving demography, topography, land characteristics, access routes, and jurisdictional boundaries. The variety of circumstances that may be encountered in an actual situation dictate that the final determination of the area of special concern be made based on assessment and the protective actions to be implemented. State and county plans reflect the circular area which is of general concern during the planning phases. The licensee will usually reflect an exact shape of the plume exposure pathway EPZ in planning for the outdoor warning system to determine placement of the sirens.

The concept of Emergency Planning Zones necessarily implies mutually supportive emergency planning and preparedness arrangements by the various governmental levels involved. The important point is that integrated emergency planning will benefit all of the communities within the Emergency Planning Zones. There must also be an acceptance by the governments involved and a clear recognition of the responsibility they share for safeguarding public health and safety.

Enrico Fermi Atomic Power Plant is one of the few U.S. situations involving emergency planning considerations across an international boundary, although both the U.S. and Canada have nuclear facilities near their common borders. Mutual emergency planning with Canada is desirable and, while NRC and FEMA are pursuing this matter through appropriate channels, it has been necessary to develop an informal working relationship with Canada. This was effected during early planning stages through meetings, at least two of which were hosted by Detroit Edison, involving representatives from Canada as well as FEMA Region V, Michigan Emergency Management Division and Monroe and Wayne Counties.

Canadian nuclear power plant emergency planning criteria addresses a plume exposure emergency planning zone of 10 kilometers where the United States addresses an EPZ of 10 miles. Using Canadian criteria (kilometers),

the Fermi II EPZ would not include the small parcel of land in Essex County near Windsor, Ontario. Exclusion of the land from the plume exposure pathway EPZ would serve to align U.S. emergency planning more closely with Canadian planning concerning Fermi II.

Canadian waters of Lake Erie would still remain in the EPZ using either Canadian criteria or the licensee's proposal. We understand that warning, evacuation and control of this portion of the EPZ will be affected cooperatively by the U.S. and Canadian Coast Guard in accordance with an existing mutual support agreement.

Canadian officials from Ontario Province and Essex County have stated their concern for transmission and receipt of timely notification and accurate information concerning emergency conditions. The possibility of being in the ingestion zone introduces the potential need to take immediate action in the event of a significant radiological accident. We understand Detroit Edison has installed a direct telephone line with radio back-up to Essex County, Ontario. This is similar to the notification links provided to Monroe County and the State of Michigan, as required by NUREG-0654/FEMA REP-1, Revision 1. This would be reflected in the licensee's emergency plan, but not in either the State of Michigan or County plans. The Michigan State Police relay notification to Canadian officials in Toronto thru established communications links. In addition, Ontario and Essex County officials have expressed their desire during meetings (and demonstrated their capability during the full-scale exercise) to place liaison officers in the State EOC or the State On-Scene EOC. This liaison arrangement will be described in the revised State Emergency Plan and the Monroe County Emergency Operations Plan. The FEMA Director of International Affairs has been advised of these working arrangements.

FEMA Region V agrees that timely notification and follow-on flow of accurate information to the local and provincial level is necessary. Obviously, criteria within our NUREG-0654 is not applicable to them and Canadian officials must act on information provided in accordance with their procedures.

2. Emergency Classification System

NRC comments are noted.

3. Notification Methods and Procedures

As reflected in Section IIE of our interim finding report, FEMA Region V and the Regional Assistance Committee share NRC's concern regarding the timeliness for notification of the public. Specifically, the emergency plans reviewed by the RAC did not address the timeliness. This was cited to the State of Michigan Emergency Management Division on January 21, 1982, as a deficiency in the plans.

We recognize the design objective for offsite officials to have the capability to essentially complete the initial notification of the public within about 15 minutes following notification by plant operators of a situation requiring urgent action.

Follow-on discussions with Michigan Emergency Management Division staff indicates their belief the administrative capability exists to make prompt protective action decisions and, upon completion of the outdoor warning system installation, will exist to alert the public. This belief was affirmed by them in a meeting involving FEMA Region V, Detroit Edison and Michigan EMD representatives on May 16, 1983. It was reaffirmed through telephone conversation between Lt. Tyler, Michigan Emergency Management Division, and Mr. Anthony, FEMA Region V, on June 2, 1983.

Administrative procedures are in effect wherein the Michigan Department of Radiological Health evaluates the utility's recommendation and advises the Governor in coordination with the Michigan Emergency Management Division. The Governor, then, makes a decision concerning implementation of emergency plans in accordance with Michigan Public Act 390, which includes effecting protective actions and providing information to the public. These actions would result from the Governor's declaration that a state of disaster exists.

In a faster moving situation in which there is an immediate threat, Counties are empowered to take necessary action to protect the public within their political jurisdiction. In an event involving a nuclear power plant, the Counties' actions would be based upon the recommendations of the utility. In similar circumstances involving natural disasters, Monroe County has actual experience in taking protective actions. There is no indication that actions invoked by the County have not been timely.

Federal observers did not note any delays in this decision making process during the Fermi II exercise. However, the outdoor warning system was not installed at that time and evaluation could not be made involving time from notification by the utility to notification of the public.

4. Radiological Emergency Response Training.

NRC staff's request that FEMA take appropriate action to assure that an acceptable emergency preparedness training program is established and training is provided for members of the offsite emergency organizations is noted. NRC staff's action to obtain assistance from the applicant in providing this training is appreciated.

The Michigan Emergency Management Division, with assistance from the various utility companies in Michigan and the Michigan Department of Radiological Health, has developed and implemented a comprehensive radiological emergency response training program, which is described in our reply to the Atomic Safety and Licensing Appeals Board queries, which is Attachment 1 to this letter, and is identified as Assertion Number 2.

This training program is being scheduled by the Michigan Emergency Management Division, as the lead coordinator, in a site-specific manner to precede the exercise of a particular nuclear power plant. It will be offered in Wayne and Monroe Counties, site-specific to Fermi II, about two months prior to the next exercise, which is scheduled for October 4-5, 1983. -

5. Monroe County Petition

Statement is noted.