



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION V

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WALNUT CREEK, CALIFORNIA 94596

RSB

September 20, 1983

MEMORANDUM FOR: Eric D. Weinstein, Incident Response Branch, Division
of Emergency Preparedness and Engineering Response, IE

FROM: Ross A. Scarano, Director, Division of Radiological
Safety and Safeguards Programs

SUBJECT: EMERGENCY PREPAREDNESS REGIONAL ASSESSMENT PROGRAM:
ASSESSMENT YEAR NO.2

Reference the memorandum from E. L. Jordan to the Regional Administrators, same subject, dated August 18, 1983, the following comments are submitted: (Note: We have numbered the "Observable" column and comments are referred to by item number.)

- Item 3: It is not clear which technical staff is being referred to - is it the Regional, Headquarters or both? It is our understanding that the technical staff referred to is the Regional staff. If our understanding is correct then recommend that this item be clarified.
- Item 5: It is our understanding that the objective is to evaluate the timeliness of the Regional Administrator decision making process. If our understanding is correct then this item should be restated to determine how the Regional Administrator arrived at the decision to either escalate or deescalate the agency response.
- Item 9: The last question in item 9 and items 10 and 18 are so related that we recommend that they all be combined.
- Item 14: Recommend that this item be changed to read: "Does the RA provide guidance or direction to the new BTM prior to departure for site?"
- Item 22: This item seems to be covered in item 21. If this is the case, recommend that this item be deleted.
- Item 23: Based upon our current approved supplement, we have only one contact to be made to the State in the Standby mode. We recommend only one notification be made to the State to comply with the NUREG-0845 criteria.
- Item 26: Does this mean that the Base Team is actively supporting Headquarters and the Site Team in the Initial Activation mode? If so, recommend some clarification be made to clearly identify who the Base Team supports and in what modes.

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- Item 40: This item places emphasis on the location of the resident inspector briefing to the Regional Administrator. The emphasis should not be on the location but on the fact that the briefing was conducted. Recommend this item be changed to the following: "When was the RA briefed by the Resident Inspector?"
- Item 41: This item appears to imply that while the DSO/STL base of operation should be the EOF, it may be at other locations. It is our understanding that the EOF is the only location where one will find the licensee management, State, Federal and local decision makers or representatives. If our understanding is correct, recommend that this item be changed to reflect that the EOF be set up as the base of operations.
- Item 42: This item appears to be a duplicate of item 35. If this is correct, recommend deletion of item 42.
- Item 50: This item appears to be a "nice-to-have" function. If it is not essential we recommend deletion.
- Item 51: This item appears to be evaluating the Chairman of the NRC. If this is the case, we recommend deletion.
- Item 52: This item appears to be the same as item 51.
- Item 55: It is not clear what the objective is for this item. Recommend that this item be reviewed and the objective more clearly stated.
- Item 56: Recommend additional clarification or combination of this item with item 43. Both of these items appear to achieve the same objective.
- Item 59: As written, this item appears to give the observer too much latitude or it makes the scope too large for observation. We recommend that the scope be more narrow or the latitude reduced.
- The following as an alternative: "Does the DSO consult with the NRC staff prior to rendering advice, assistance, or direction to the licensee?"
- Item 60: It appears that this item is similar to item 59 and could be managed in a similar manner.
- Item 63: The subject matter of this item comes very close to, if not actually, interfering with the State and local government decision making process. Recommend that the Regions not be assessed on this item.

Item 64: This item appears to be similar to item 63 and the same recommendation applies.

Thank you for the opportunity to comment on this program.

/s/
Ross A. Scarano, Director
Division of Radiological Safety
and Safeguards Programs

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