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Docket No. 50-289

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Mr. Henry D. Hukill, Vice President  
 and Director - TMI-1  
 GPU Nuclear Corporation  
 P. O. Box 480  
 Middletown, Pennsylvania 17057

Dear Mr. Hukill:

Enclosed for your information is a May 23, 1984 memorandum from R. Krimm (FEMA) to E. Jordan (NRC) which describes and sets forth PEMA's schedule for correcting the deficiencies from the November 16, 1983 full scale exercise of the Offsite Radiological Emergency Preparedness Plans for Three Mile Island Nuclear Station. Note that FEMA considers four of the deficiencies to be "Category A" in nature, where "Category A" indicates that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public. We consider the three "Category A" deficiencies concerning communications to be relevant to TMI-1 restart certification item 144, Communications Drills, (PID 12010(g)), and are currently proposing to handle the fourth "Category A" deficiency, addressing Dauphin County participation, separate from the restart proceeding.

Sincerely,

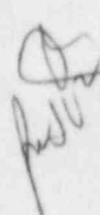
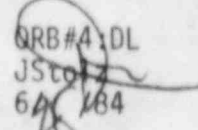
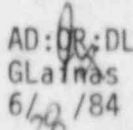
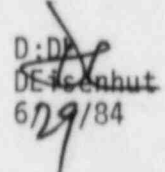
Original signed by  
 Darrell G. Eisenhut

Darrell G. Eisenhut, Director  
 Division of Licensing

Enclosure:  
 As Stated

cc w/enclosure:  
 See next page

\*See previous white for concurrences.

 ORB#4:DL JVan Vliet;cf 6/18/84	 ORB#4:DL JSto 6/18/84	 AD:DR:DL GLainas 6/20/84	I&E EJordan* 6/20/84	OELD JGray* 6/20/83	 D:DL DEisenhut 6/29/84
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Docket No. 50-289

Mr. Henry D. Hukill, Vice President  
and Director - TMI-1  
GPU Nuclear Corporation  
P. O. Box 480  
Middletown, Pennsylvania 17057

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EBlackwood

Dear Mr. Hukill:

Enclosed for your information is a May 20, 1984 memorandum from R. Krimm (FEMA) to E. Jordan (NRC) which describes and sets forth PEMA's schedule for correcting the deficiencies from the November 16, 1983 full scale exercise of the Offsite Radiological Emergency Preparedness Plans for Three Mile Island Nuclear Station. Note that FEMA considers four of the deficiencies to be "Category A" in nature, where "Category A" indicates that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public. We consider the three "Category A" deficiencies concerning communications to be relevant to TMI-1 restart certification item 144, Communications Drills, (PID #2010(g)), and are currently evaluating the fourth "Category A" deficiency, addressing Dauphin County participation, to determine the appropriate course of action. We will advise you of the results of our evaluation.

Sincerely,

John F. Stolz, Chief  
Operating Reactors Branch #4  
Division of Licensing

Enclosure:  
As Stated

cc w/enclosure:  
See next page

*OT E concurrence  
received from  
D Matthews via phone  
concurrence  
received*

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JVan Vliet;cf  
6/ /84

ORB#4:DL  
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6/ /84

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6/ /84

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# Federal Emergency Management Agency

Washington, D.C. 20472

MAY 23 1984

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 Programs

SUBJECT: Schedule of Corrective Actions for the November 16, 1983,  
Full-scale Exercise of the Offsite Radiological Emergency  
Preparedness Plans for the Three Mile Island (TMI) Nuclear  
Station

Attached is a copy of the schedule of corrective actions submitted by the Pennsylvania Emergency Management Agency (PEMA) in response to deficiencies cited by Region III of the Federal Emergency Management Agency (FEMA) for the November 16, 1983, Full-scale exercise of the Offsite Radiological Emergency Preparedness Plans for the TMI Nuclear Station.

We agree with FEMA Region III that the proposed corrective actions related to the Category A deficiencies in Dauphin and Lancaster Counties should form the basis for an acceptable finding on offsite preparedness, which we will furnish to you as soon as possible after the scheduled exercises. Region III will work closely with PEMA to ensure an adequate scenario for the table-top exercise of Dauphin County's ability to respond to an accident at TMI. This table-top exercise will occur by September 30, 1984, after the transfer of Dauphin County to their new Emergency Operations Center. Region III will evaluate Lancaster County's ability to respond to an accident at TMI during the October 17, 1984, exercise in conjunction with the Peach Bottom Atomic Power Station.

If you have any questions concerning this schedule of corrective actions for the TMI Nuclear Station, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division, at 287-0200.

Attachment  
As Stated

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# Federal Emergency Management Agency

Region III 6th & Walnut Streets Philadelphia, Pennsylvania 19106

MAY 11 1984

MEMORANDUM FOR: Samuel W. Speck  
Associate Director  
State and Local Programs and Support

ATTENTION: Robert S. Wilkerson, Chief  
Technological Hazards Division

FROM: Thomas E. Hardy  
Acting Regional Director

SUBJECT: Response of the Commonwealth of Pennsylvania to the  
Federal Emergency Management Agency and Regional  
Assistance Committee, Region III Exercise Evaluation  
Report of the November 16, 1983 Exercise in Conjunction  
with the Three Mile Island Nuclear Station.

Attached you will find a copy of the above-referenced report from John L. Patten, Director, Pennsylvania Emergency Management Agency (PEMA). The report contains the corrective actions the State has proposed to resolve the various deficiencies as well as, where appropriate, the projected and/or actual dates that the corrective actions will be completed.

A detailed review of the document has been conducted by the Technological Hazards Branch, with particular emphasis placed on the five "Category A" Deficiencies. The proposed resolution of the two Dauphin County and three Lancaster County "Category A" Deficiencies should be acceptable; a more comprehensive analysis will have to await a completion of the corrective actions by the governmental jurisdictions involved.

Dauphin County expects to move to their new Emergency Operations Center by July 1984. They have proposed that a "table-top" exercise be held no later than September 30, 1984. We will work with PEMA to ensure an adequate scenario is developed and that necessary procedures are demonstrated in order that we may come away with a clear determination as to Dauphin County's ability to respond to an accident at TMI. Two of the three Lancaster County deficiencies will be addressed during the October 17, 1984 exercise in conjunction with the Peach Bottom Atomic Power Station. It is apparent that the third Lancaster County "Category A" Deficiency was as a result of a misunderstanding and thus it is no longer an issue.

We will continue to work with PEMA to resolve some minor issues concerning their response as pertains to projected dates when certain training courses are expected to be completed and the need for further clarification of some of their corrective actions of "Category B" Deficiencies.

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### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY</u> (continued)				
5. Dauphin County's call-down lists contained many incorrect telephone numbers, and in some cases the local EMCs were not contacted directly. The County staff should establish a procedure for regularly checking and, if necessary, correcting the call lists, and a greater effort should be made in notifying the municipal EMCs directly.	E.1.	The call-down lists used for actual emergencies are verified more than twice a year. During the day of the exercise, some municipalities planned on using different telephone numbers than those reported on the call-down lists. Dauphin County originally was using the alternate telephone numbers that had been supplied by these municipalities. It is believed that the observer incorrectly interpreted these numbers as incorrect telephone numbers.	N/A	N/A
6. The Dauphin County EOC did not provide adequate space or amenities for a full-scale emergency response. A new EOC, presently under construction, should be completed, as planned, within 6 to 12 months from the exercise.	H.3.	Had this been a real incident, the EOC would have expanded into other areas of the Court House to guarantee needed space. Also, the completion of the new EOC will provide for a large single location.	N/A	N/A
7. In arranging for the simulated evacuation of the Hershey Medical Center, Dauphin County officials discovered that assembling the 80 ambulances needed would take at least four hours from the time of the general evacuation. Actually evacuating the patients would take, presumably, several hours longer. This issue should be examined, with the aim of either reducing the evacuation time or providing for patient sheltering and issuance of KI.	J.10.d.	Hershey Medical Center's only participation in the exercise was to conduct contamination monitoring and decontamination procedures with an injured GPU workman. This was clearly set forth on Page 4 of the Narrative Summary Sheet submitted as an attachment to PEMA's scenario. The commitment to procure ambulances was, for this exercise, an after thought. An evacuation time of four hours is not unreasonable from the Hershey Medical Center. The need for 80 ambulances is high. During the actual TMI accident, the patient census was reduced from 300 to 70 people leaving less than an 80 ambulance requirement.	N/A	N/A
8. Future exercises should include a more extensive and realistic demonstration of congregate care capability, including monitoring/decontamination of evacuees and vehicles, and registration procedures.	J.12.	PEMA is attempting to persuade counties to conduct more demonstrations within the mass care centers.	N/A	N/A
9. If Halifax Senior High School will continue in the role of reception/mass care center, the emergency response staff should be stressed in a future exercise by demonstration of monitoring, decontamination, registration and care procedures for simulated evacuees.	J.12.	As stated of Page 5 of the Narrative Summary Sheet, submitted as an attachment to PEMA's scenario, Halifax High School would participate as a reception center and mass care center (a decontamination team would not be present). However, PEMA will continue to encourage support counties to increase their demonstration capabilities of mass care center requirements.	N/A	N/A



### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY</u> (continued)				
10. At the Susquehanna Township Middle School (Emergency Worker Decontamination), the following improvements are needed:	K.5.b.	Training and education courses for the personnel of this decontamination center are being scheduled, and will be conducted in the near future.	N/A	N/A
a. Additional staff is necessary for 24-hour operation. Currently, there are only 5 people available to work round-the-clock. The team feels they need 10 people/shift.				
b. Training-none of the personnel have had adequate training; the director has taken a home study course in radiation. Training would help improve their operations, especially in the area preventing the spread of contamination.				
c. No victims were present which made the exercise lose much of its worth for the personnel. The Federal observer was the only visitor during the whole drill; no communication was exchanged with the County. Morale is particularly low concerning this last point. The personnel believe that no one talks with them from the County and that they are operating in a vacuum.		In future exercises, PEMA will provide observers and exercise messages to County in an effort to improve communications with decontamination stations and County EOCs.	N/A	N/A
11. Schools within the 10-mile EPZ should include appropriate staff in evacuation drills or "dry runs" to both familiarize personnel with the plans, and determine time estimates for completing activities.	J.10.d.	Dauphin County continues to work with the school districts for emergency planning and education. The school district drills or "dry runs" can be urged by Dauphin County but must be done by school district initiative.	N/A	N/A
12. Arrangement for local RACES operators to ride school evacuation buses should be formalized, in order to provide a means of communication with the drivers.	J.10.d.	There is no requirement for school buses to be equipped with RACES operators to provide a radio means of communication with the drivers. Evacuation school buses arrive at the schools they support. After loading they are dispatched over predesignated evacuation routes to their designated host schools outside the plume exposure pathway EPZ.	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY (continued)</u>				
<u>LONDONDERRY TOWNSHIP</u>				
1. A status board was not used at the Londonderry Township EOC. A status board should be used during future events to convey information to the staff.	J.9.	Emphasis is being placed on all EOCs to use action status boards during actual and exercise events.	N/A	N/A
2. The Londonderry Township EOC implemented route alerting too early (prior to activation of the sirens and EBS). Additional training should be provided to Township officials to improve their familiarity with plans and procedures.	J.10.c.	Route alert training is being conducted by PEMA, County and consultant personnel.	N/A	N/A
3. Arrangements should be made to ensure adequate police staffing for round-the-clock security at the EOC.	A.1.e.	Some municipalities cannot afford the luxury of a dedicated 24-hour two shift sheriff/police officer; however, they do designate a volunteer staff person to carry out that function.	N/A	N/A
<u>DERRY TOWNSHIP</u>				
1. The Township EMC did not receive notification of the Governor's order to evacuate.	E.1.	This was an error caused by inexperience and lack of communication. Continued training in this area should eliminate future mistakes.	N/A	N/A
2. Township officials misinterpreted a County message and implemented route alerting too early (prior to activation of the sirens and EBS), even though they recognized that this did not conform to the planned sequence. In the future, Township officials should confirm or clarify instructions which they perceive to be incorrect.	J.10.e.	Route alert training is being conducted by PEMA County and consultant personnel.	N/A	N/A
3. Directional signs for evacuation routes were dispatched early, creating the possibility of public confusion. The Township should consider displaying these signs only after an evacuation has been officially announced.	J.10.g.	The display of evacuation route signs is not required by the municipal plan; however, the observer's comment is well taken.	N/A	N/A

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DERRY TOWNSHIP (continued)</u>				
4. Responsibilities for evacuation of Hershey Medical Center were not clearly identified in advance planning. The County and Township should resolve the issue of responsibility, and if appropriate, the plans should be modified accordingly.	J.10.d.	Responsibility for evacuation of the Hershey Medical Center is clearly defined in Annex G, paragraph II, of the Dauphin County plan. Derry Township has no responsibility for evacuation of the center. The only responsibility Derry Township has is to verify the center has been notified and provide necessary traffic control leading to the main evacuation routes. Those responsibilities are shown in the Derry Township plan in paragraph IV. The plans are correct and Dauphin County and Derry Township have resolved the issue of responsibility in this area.	N/A	N/A
5. Destinations for non-ambulatory evacuees were not clearly identified in advance planning. The destination(s) should be determined, and designated in the plan.	J.10.d.	Destinations for non-ambulatory evacuees are the same as for ambulatory evacuees; friends or relatives outside the plume exposure pathway EPZ or a mass care center. Entry to a mass care center is through a reception center, which in the case of Derry Township is the Northern Lebanon High School as shown in sub-paragraph B, page 10 of the Derry Township plan.	N/A	N/A
6. Dosimetry was not issued to bus drivers before dispatch, nor were protective measures taken for EOC personnel. Township officials should review plans and procedures, and provide dosimetry to emergency workers accordingly.	K.3.a.	Dosimetry-KI is not issued to bus drivers. They are not considered to be emergency workers in the same sense as firemen, policemen, ambulance personnel and farmers who may be required to re-enter the plume exposure pathway EPZ or remain in it while the population is evacuating. Bus drivers evacuate with the general population. Dosimetry is available for EOC personnel and it should have been issued. PEMA County and consultant firms are training municipalities in this area.	N/A	N/A
<u>SOUTH HANOVER TOWNSHIP</u>				
1. Round-the-clock staffing was not demonstrated. The Township should demonstrate this capability in future exercises.	A.1.e	Some of the all-volunteer municipal EOC staffs are not large enough to permit two shift watch sections. In such cases, limited staff members would be required to sleep at the EOC and relieve each other.	N/A	N/A

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY</u> (continued)				
<u>MIDDLETOWN BOROUGH</u>				
1. The Borough should provide written message forms for all EOC personnel to ensure that all important incoming, outgoing, and internal information is not misplaced.	J.9.	An effort is being made to standardize message formats for county and its associated municipalities.	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>YORK COUNTY</u>				
1. Improved coordination on operational matters between State and York County to provide the County the information required for direction and control is needed.	A.1.b.	Coordination on operational matters will be enhanced by the assignment of PEMA's emergency action specialists who will frequently brief county EOCs on the current situation to include no change reports.	N/A	N/A
2. York County should consider having dosimetry and KI available for school evacuation bus drivers.	J.10.e. K.3.a.	It is state policy not to issue dosimetry-KI to evacuation bus drivers, and the York County plan is in consonance with the state plan in this respect.	N/A	N/A
3. Red Cross personnel should familiarize themselves with the facilities that will be used as mass care centers.	J.12.	Regional Red Cross agents are taking actions to better train their staffs in mass care operations.	N/A	N/A
4. The York County EOC distributes KI to the municipal EOCs by drivers when appropriate. Not all municipal EOCs were aware of this. These procedures should be clarified to all municipalities in York County.	J.10.e.	In addition to the familiarization training for the EMCs of risk municipalities by the York County EMC and his staff, two changes are needed in the York County plan to clarify the issue.	May '84	
5. Fire Station personnel should receive additional training in personnel surveys - such as marking a "step-off" pad/area.	K.5.b.	Deficiency not understood.	N/A	N/A
<u>LEWISBERRY TOWNSHIP</u>				
1. Lewisberry Township has a backup power source for only two hours. A larger generator would be an asset.	H.3.	Concur with the observer; however, paucity of funding will not permit the purchase of a larger generator.	N/A	N/A
<u>WARRINGTON TOWNSHIP</u>				
1. Additional telephone lines are needed.	F.1.b.	Additional phones will not be purchased due to lack of funding. The present phone, backed up by RACES, is considered adequate.	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>NEWBERRY TOWNSHIP</u>				
1. When the EMC relieved the deputy EMC, it was not clear who was in charge. To avoid confusion, the second shift personnel should be briefed and then taken over their assigned functions.	A.1.d.	Second shift personnel should take more time "relieving the watch" in future events.	N/A	
2. There was some confusion concerning evacuation instructions. Newberry Township should confirm any instructional messages through the County EOC.	E.2.	PEMA, county, and consultant personnel continue to train in municipal communications procedures.	N/A	
3. Newberry Township should review their route alerting plans since route alerting was not completed in a timely manner.	J.10.c.	PEMA, county, and consultant personnel continue to train municipal route alert teams.	N/A	
<u>FAIRVIEW TOWNSHIP</u>				
In future exercises, Fairview Township should actually perform as many functions as possible instead of using simulation. The exercise would then be a more effective training tool.	N.3.e.	PEMA continues to encourage exercising counties to enhance their training capabilities by increasing the number of actual functions.	N/A	
<u>HELLAM TOWNSHIP</u>				
1. Plans should be finalized and special arrangements made for the handling of handicapped individuals. These individuals could require special transportation arrangements which should be planned for ahead of time.	J.10.d.	Hellam Township plan has the requirement to develop a list of non-ambulatory and hard-of-hearing persons requiring special evacuation assistance. This requirement will be completed by July 1, 1984.	7/1/84	
2. Additional training on the use of dosimetry is needed.	0.4.g.	PEMA continued to train county staffs in the procedures and use of dosimetry and encourages follow-up training at the municipal level.	N/A	
3. A status board should be kept so that all responders can tell at a glance where the situation stands.	J.9.	PEMA, county, and consultant personnel are stressing the need for action status boards at the municipal level.	N/A	

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>LANCASTER COUNTY</u>				
1. Much of the county's EOC staff was prepositioned before the start of the exercise. In future exercises, prepositioning should be avoided because it removed the opportunity to measure the time needed to accomplish notification and staff when initiated at the emergency classification levels prescribed in the county plan.	N.1.b.	Since eight members of the EOC staff are full time employees, it is very difficult to measure response time. A no-notice drill would be the only method to insure a true evaluation.	N/A	N/A
2. The mass care coordinator departed the EOC (without designation of a substitute) during Site Area Emergency in order to supervise activation of a county decontamination and reception center. The county RERP calls for staffing of the mass care coordinator position at the EOC and the ordering of activation of reception and mass care centers by the coordinator from the EOC. Staffing of this position should not be interrupted in future exercises.	A.2.a.	When the coordinator dispatches a member of his staff to another location, he assumes responsibility for the vacated position.	N/A	N/A
3. All incoming and outgoing EOC messages were not written and logged. Messages should be recorded and logged, preferably in a central message center.	J.9.	Concur.	10/17/84	
4. On a number of occasions the county coordinator answered the telephone. He was generally not in a position nor did he have the time to record the messages received. Except in special circumstances, the coordinator should not be answering the telephone. If the coordinator does take a message on the phone, another EOC staff member should record the message either by listening on an extension or by utilization of a speaker phone.	J.9.	Concur.	10/17/84	
5. Verification of receipt of all messages directed to other organizations by the county was not obtained. It is essential that some type of verification be required.	E.2.	Concur.	10/17/84	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>LANCASTER COUNTY (continued)</u>				
6. Failure of a member of the EOC communications staff to relay word to the Director when it was learned that a municipality had not received notice of Site Area Emergency 4 minutes after it had been announced indicates some lack of familiarity with the overall RERP concept of operations. All EOC staff should be given at least a basic orientation in the county's concept of operations.	A.1.b.	Concur.	10/17/84	
7. The county did not provide regular, periodic updates to the municipalities concerning plant status, meteorology, dose projections, etc. Even if there has been no change in plant status, or if little information is available to the county, the municipalities need to hear from the county in order to maintain a sense of an integrated response. If the county had been providing periodic summaries to the municipalities, the failure to communicate word of the Site Area Emergency declaration would have been discovered earlier than it was.	J.9.	Concur.	10/17/84	
8. When an attempt was made to use the county's remote pickup unit, it was not in immediate working order. The county communications staff should assume that the unit is ready to be used at all times.	E.5.	The "Redi-alert" monitor is not a critical element of the Lancaster County emergency communications system. Again, to simplify the evaluation process, this receiver will be brought "on line" prior to the start of the next exercise.	10/17/84	
9. The county's plan does not address in sufficient detail the protective actions to be taken at the Masonic Nursing Home in West Donegal Township. It is indicated that the Home would not be evacuated in the event an evacuation were to be ordered for the EPZ. The plan should include an explanation of the factors preventing an evacuation and should address the alternate protective actions to be taken to safeguard the health and safety of the Home's residents and employees.	J.10.d.	The new Administrator of the Masonic Nursing Home indicates that an evacuation plan is again being considered. A meeting will be held in the near future to discuss plans for implementing this change of policy.	8/31/84	
10. The pocket dosimeters issued to personnel at the county EOC were not calibrated. Future exercises should include a demonstration of the county's ability to calibrate these instruments.	K.3.a. K.3.b.	The Lancaster County Emergency Management Agency will demonstrate an ability to calibrate pocket dosimeters during future exercises.	10/17/84	



SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>LANCASTER COUNTY</u> (continued)				
11. The county emergency operations staff was in possession of an exercise scenario prior to the exercise. For the sake of the integrity of exercises as tests of emergency response capability and for the sake of their value as training events, scenarios should not be available to local governments or to state players.	N.1.a.	This deficiency was caused by the state inadvertently distributing an "observer time and events schedule." This problem has been rectified and should not re-occur.	11/18/83	11/18/83
12. The county emergency management coordinator ordered termination of the county's participation in the exercise at a time when notification of the evacuation order was still being transmitted, when a decontamination and reception center and a mass care center were just being activated and before any confirmation had been received from the municipalities that route alerting had been completed.	N.1.a.	The Lancaster County coordinator terminated the county's participation in the exercise only after his working relationship with the FEMA evaluator deteriorated to a level that made continuation of the exercise impractical.	N/A	N/A
<u>MOUNT JOY TOWNSHIP</u>				
1. The township is lacking a reliable backup means of communication with the county EOC or other organizations. Some reliable backup system should be put in place.	F.1.b.	A new two-way radio has been ordered and will be operational prior to the next exercise.	6/1/84 (est.)	
2. Messages coming into the EOC were not recorded in their entirety. For the sake of situations that arise in which message retrieval is necessary, the messages should be recorded.	J.9.	The township coordinator is fully aware of this deficiency and has taken the necessary action to preclude re-occurrence.	8/15/85	
3. The EBS radio message heard at the Mount Joy Township EOC was broadcast 34 seconds after sounding of the sirens. The EBS station covering this area should be advised to delay broadcast for several minutes in order to give residents time to get to a radio or television.	E.5.	The township coordinator recognizes the importance of the time interval between siren alerting and the EBS broadcast and has taken the necessary action to preclude re-occurrence.	8/15/85	

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>MOUNT JOY TOWNSHIP</u> (continued)				
4. The township radiological officer evidenced some confusion concerning exposure control. Continued training should be sought in order to enhance his understanding of his responsibilities.	0.4.g.	The township radiological officer is fully qualified for his position having graduated third in his training class. This deficiency is probably the result of a misunderstanding with the evaluators.	N/A	N/A
<u>CONROY TOWNSHIP</u>				
1. EOC staff were prepositioned prior to the beginning of the exercise. Prepositioning should be avoided in future exercises in order to enhance their value.	N.1.b.	As previously stated, a no-notice drill is the only method that would insure a true evaluation of response time.	N/A	N/A
2. The township does not have sufficient personnel for round-the-clock staffing of the EOC. Present efforts for recruiting and training volunteers for the staff should be continued.	A.1.e.	The township coordinator is reviewing EOC staff positions and strength figures and will make the changes necessary to insure adequate staffing of the EOC.	8/15/85	
3. The EOC is equipped with only one telephone line and this line is shared with the township police department. Additional phones should be obtained. In addition, backup communications capability such as the radio and antenna scheduled for installation, as mentioned in this narrative, should be pursued.	F.1.b.	The township coordinator is fully aware of the communication problems and will continue to seek budgetary help from the township supervisors.	Unknown	N/A
<u>EAST DONEGAL TOWNSHIP</u>				
1. The township's communications capabilities are very limited. Some provision for additional capabilities should be made.	F.1.b.	East Donegal Township is in the process of upgrading its entire emergency management facility. A contract has been awarded for the construction of a new EOC that will greatly enhance both operational efficiency and communications capabilities.	8/15/85	

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>EAST DONEGAL TOWNSHIP</u> (continued)				
2. A person not identified in the county or township plan by name or position was allowed to participate in the township's emergency operations. Any persons participating in future exercises should be identified in an appropriate plan with supporting agreements, contracts, etc., concerning their commitment to aid in an actual emergency.	A.2.a.	See West Donegal Township Category B deficiency number five (5).	N/A	N/A
<u>WEST DONEGAL TOWNSHIP</u>				
1. The individual designated to coordinate transportation resources for the township was unavailable for the exercise. No backup person was designated. Backup personnel should be designated to assume the responsibility of transportation coordinator in a real emergency. In future exercises, a qualified person should fill this position.	A.1.e.	The township coordinator will designate an alternate transportation officer in the event the primary (volunteer) is working. This type of absence can be expected during drills, but will not be a problem during actual emergencies.	8/15/85	
2. The township's communications equipment is very limited. Consideration should be given to providing additional equipment.	F.1.b.	The township coordinator is fully aware of the communications situation and will continue to request assistance from the township supervisors.	Unknown	N/A
3. The township's list of handicapped individuals needing special assistance in evacuation was dated February 1983. This list should be updated more frequently.	J.10.d.	In the future, the list of handicapped individuals will be updated quarterly.	3/1/84	
4. The township's plan does not address in sufficient detail the protective actions to be taken at the Masonic Nursing Home. It is indicated that the Home would not be evacuated in the event an evacuation were to be ordered for the EPZ. The plan should include an explanation of the factors preventing an evacuation and should address the alternate protective actions to be taken to safeguard the health and safety of the Home's residents and employees.	J.10.d.	See Lancaster County Category B deficiency number nine (9).	Unknown	N/A

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<p><u>WEST DONEGAL TOWNSHIP</u> (continued)</p> <p>5. A person not identified in the county or township plan by name or position was allowed to participate in the township's emergency operations. Any persons participating in future exercises should be identified in an appropriate plan with supporting agreements, contracts, etc., concerning their commitment to aid in an actual emergency.</p>	<p>A.2.a.</p>	<p>There are many individuals permitted access to various county and township EOC facilities for the purpose of evaluating or simply observing an exercise. Although security of the EOC is of paramount importance, there must be some latitude during training exercises for the purpose of allowing elected officials, training officials, government evaluators, etc., to see, first hand, the level of emergency preparedness being demonstrated by the EOC coordinator and his staff.</p>	<p>N/A</p>	<p>N/A</p>

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>CUMBERLAND COUNTY</u>				
1. The operation of the County EOC could be made to run administratively more smoothly by: <ul style="list-style-type: none"> <li>a. Development and use of standard message forms to transmit internal EOC communications.</li> <li>b. Designation of a support person to be responsible for status board update of significant events.</li> </ul>	J.9.	Forms were developed but not in use the day of the exercise.  Designated communications officer to be responsible for update of status board.	Done  Done	N/A  2/10/84
2. Continue efforts to upgrade and incorporate the revised teletype equipment into the inter-EOC communications network.	F.1.b.	Work was being done on this deficiency during the exercise.	Done	2/27/84
3. Clarify the issue as to whether the County will deliver the dosimetry kits to the municipalities or the municipalities will pick up the kits at the County EOC. Revise the plan if necessary.	K.3.a.	The County will deliver the dosimetry kits to the municipalities, in accordance with Paragraph VII.G.2.k. on page 11 of the county plan.	3/84	3/31/84
4. EBS radio coverage may not prove adequate for 24-hour availability and full EPZ coverage. According to EOC staff, the AM EBS station goes off the air at sundown, and the FM station does not cover the western shore. The County should take steps to provide for backup EBS coverage, considering use of the Dauphin County EBS station, which according to the EMC, does transmit to the western shore.	E.5.	Although the EBS AM station goes off the air at sundown, in the event of an emergency the station manager will bring the station up to full power and activate the station as per agreement, Appendix 7, Annex T. (See enclosure.)	Done	3/2/84

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>CUMBERLAND COUNTY</u> (continued)				
5. Discussion with the EMC indicates that quarterly training sessions for staff and agency representatives are being planned. Although REP exercises provide the opportunity to experience a more true-to-life accident situation, this experience should be augmented with training sessions regarding agency-specific responsibilities, inter-agency relationships, and use of dosimetry and KI. Additionally, inexperienced agency representatives should be paired with experienced representatives to provide adequate response knowledge and capability.	O.4.g.	Our quarterly training sessions for staff and agency representatives will coincide with the TMI exercise so that we may have more inter-agency play during the exercise. This will be augmented by quarterly training in all other fields of emergency response.	6/84	
6. The State should ensure protection of the scenario from pre-distribution to exercise players.	N.1.a.	This deficiency was caused by State inadvertently distributing an "observer time and events schedule." This problem has been rectified and should not re-occur.	N/A	N/A
7. The County should maintain close communications with the municipalities, especially with regard to notification of EBS message content and time of release.	J.9	The County does keep very close communications with their municipalities. The failure of notification of content and time of release of EBS message was an apparent oversight.	Done	3/2/84
8. Future full-scale exercises should demonstrate additional areas of capability, to include media relations, mass care activation, and decontamination procedures.	N.1.b.	Recommendation will be made to local municipalities to participate to their fullest capability to demonstrate the additional areas. They are somewhat reluctant to do so because of their use of volunteer personnel.	Done	3/2/84
9. The PEMA hotline phone hookup should be serviced to enable activation of the line in the EOC operations room.	F.1.b.	When the new EOC is completed, the PEMA hotline will be installed in the operations room as well as the communications center.	1/85	
10. The County should clarify procedures for requesting and authorizing dose rates in excess of the PAGs, especially as relates to farmers.	K.4.	A revised Annex M covers this subject even more clearly than it is stated in the current version of Annex M. The revised Annex M should be published as a change to the Cumberland County plan and distributed to all holders of the plan. Farmers are classified as emergency workers, therefore, all instructions for emergency workers apply equally to farmers.	5/1/84	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>CUMBERLAND COUNTY (continued)</u>				
<u>LOWER ALLEN TOWNSHIP</u>				
<p>1. Lower Allen Township should finalize the development and publishing of its Radiological Emergency Preparedness Plan. Assurance should be taken to incorporate within this plan:</p> <ul style="list-style-type: none"> <li>a. An accurate and updated list of emergency response personnel.</li> <li>b. Demonstrated 24-hour staffing capability for all critical response positions.</li> <li>c. An updated list of individuals requiring special evacuation assistance.</li> <li>d. Prepared messages for use in route alerting.</li> <li>e. Identification by address of designated reception center.</li> <li>f. Identification of appropriate EBS station(s).</li> </ul> <p>The Township should also establish time frames and responsibility for periodic updating of the plan.</p>	<p>J.9.</p>	<p>Lower Allen Township recently obtained a new municipal emergency management coordinator. This change has brought about a closer relationship with the Cumberland County emergency management staff. Both staffs have agreed to work together in correcting the deficiencies depicted in 1, and 2.</p>	<p>Unknown</p>	
<p>2. Training should be provided to all personnel with field responsibilities with regard to the use of dosimetry, KI and record keeping procedures.</p>	<p>0.4.g.</p>	<p>Lower Allen Township recently obtained a new municipal emergency management coordinator. This change has brought about a closer relationship with the Cumberland County emergency management staff. Both staffs have agreed to work together in correcting the deficiencies depicted in 1, and 2.</p>	<p>Unknown</p>	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<p><u>LOWER ALLEN TOWNSHIP</u> (continued)</p> <p>3. Future exercises should include the distribution of actual dosimetry equipment in order to familiarize field personnel with its use.</p>	<p>K.3.a. K.3.b.</p>	<p>Actual distribution of dosimetry equipment for familiarization purposes will take place in the next exercises.</p>	<p>N/A</p>	<p>N/A</p>



### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>LEBANON COUNTY</u>				
1. Although a chalkboard was available in the EOC, it was not kept up to date. A person should be assigned the responsibility for updating the status board so that newcomers can tell at a glance what the current conditions are.	J.9.	Lebanon County did use the chalkboard to record important events but not to the satisfaction of the observer. Lebanon County coordinator will improve the quality of the action board remarks. PEMA continued to stress the importance of an updated action status board.	N/A	N/A
2. Maps showing mass care centers, decontamination centers and traffic control points should be available and posted so that the information on the locations of these facilities is available to the emergency workers.	J.10.a.	Updated maps depicting mass care center, decontamination centers and TCPs will be posted.	6/30/84	
3. The timing of the scenario was such that there were dead spots when there was very little play. Possibly more play could be interjected by the State to keep the staff active.	N.3.e.	Additional exercise messages have been drafted in an effort to interject increased play during periods of dead time.	2/20/84	2/20/84
4. Although monitoring personnel did follow the procedures in their plan, the monitoring of the soles of shoes was not accomplished. A refresher workshop on monitoring techniques could help correct this situation.	K.5.b.	PEMA is placing emphasis on this particular comment during its training in Dosimetry and Decontamination Seminars for county emergency management personnel. All county personnel involved in radiological monitoring and decontamination procedures will undergo refresher training courses.	10/30/84	
<u>SOUTH LONDONERY TOWNSHIP</u>				
1. All staff members did not report to the EOC. In order to ensure all actions are taken, plans should be made for all key staff positions to be represented at the EOC.	A.1.e.	PEMA and county will continue to encourage full participation for municipal EOC staffs.	N/A	N/A
2. No formalized briefings were given. In future exercises, the EOC should include briefings to relay information received and to use briefings to check to see that needed actions have been taken.	J.9.	Formalized briefings are not always conducive to an all volunteer, under-educated group. However, more time in relieving the shift should probably be taken.	N/A	N/A

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>SOUTH LONDONDERRY TOWNSHIP (continued)</u>				
3. Contingency plans concerning the handling of handicapped/mobility impaired individuals are confused. This information is available but not referenced in the plan.	J.10.d.	Only a small portion of Londonderry Township is subject to the 10 mile EPZ. There are no handicapped/mobility impaired persons within this area. When the observer asked for the list, the exercisee gave him a list of people in the 10-20 mile area which is not really required to the exercise.	N/A	N/A
4. It is recommended that key emergency workers receive radiological monitoring training sponsored through the State or FEMA.	D.4.g.	PEMA, county and consultant personnel continue to train emergency workers in radiological equipment usage and procedures. Key emergency workers will be required to take a refresher course.	10/30/84	

SUMMARY OF DEFICIENCIES

CATEGORY A. The following deficiencies indicate that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY</u>				
<p>1. Demonstrated staffing at the Dauphin County EOC was very limited and, in fact, would not be adequate to support the County's response to an incident at TMI for either the short or long term.</p>	A.4.	<p>For real disasters, the normal Dauphin County EOC staff is made up of four full time personnel, four county government department heads who volunteer their time during a disaster and approximately fifteen other volunteer personnel, as well as the Board of Commissioners. During the day of the exercise, the paid staff members and a volunteer RACES operator carried the bulk of the responsibilities at Dauphin County's cramped EOC. It was realized that this small staff would cause some delays in performing the normal tasks; therefore, more simulations with less action demonstrations were attempted. During the course of the exercise, it was evident that responses to various requirements would also be delayed. Dauphin County's EMC feels that his full staff can and will protect the lives and property of the people within Dauphin County if a real disaster does occur. He has agreed to demonstrate that capability by participating in a simulated RERP scenario-oriented table-top exercise after getting firmly settled into his new EOC.</p>	After July 1984	To be announced at a later date.
<p>2. Dauphin County officials did not respond promptly during a demonstration of the transfer of Notification and Alerting responsibility from the State EOC. Notifications of the other risk counties, PEMA, and the Dauphin County risk municipalities were unnecessarily delayed.</p>	E.2.	<p>If PEMA loses their communications system, Dauphin County can assume PEMA's role for notification and alerting. At 15:28 hours during the day of the exercise, a message was received that initiated this process. There was a delay in the transfer of the information (Site Emergency) contained in the initiating message. One reason for this delay was the limited number of staff members participating in the exercise. Also, Dauphin County made an attempt to use the new PEMA radio system that connects Dauphin County to neighboring counties. A contractor working on roof repairs at the Dauphin County Court House had inadvertently cut the antenna cable. After discovering the problem, Dauphin County attempted to make quick repairs in order to use and test this system. However, it was decided that it would take too much time and notifications were made by existing county radio systems. This notification, by radio, was completed at 15:43 hours (15 minutes after initial message). Telephones were used to confirm the receipt of the radio message. Additional notifications of "Site Emergency" to the municipalities were delayed due to limited number of staff present for the exercise.</p>	After July 1984	To be announced at a later date.

SUMMARY OF DEFICIENCIES

CATEGORY A. The following deficiencies indicate that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>LANCASTER COUNTY</u>				
<p>1. Notification of Site Area Emergency was not promptly received by any of the five Lancaster County municipalities in the 10-mile EPZ and was not received for almost two hours by several of the five. FEMA believes that correction of Category B deficiencies 3,4,5,6 and 7 below will further the County's efforts to avoid repetition of this type of deficiency.</p>	E.2.	<p>1. Concur in that correction of Category B deficiencies 3,4,5,6 and 7 should preclude future occurrence.</p>	10/17/84	
<p>2. The County did not begin to relay to the municipalities the Governor's order to evacuate until approximately 25 minutes after it was received in the EOC. Several of the municipalities never received the message. FEMA believes that correction of Category B deficiencies 3,4,5 and 12 below will further the County's efforts to avoid repetition of this type of deficiency.</p>	E.2.	<p>2. Concur in that correction of Category B deficiencies 3,4,5 and 12 should preclude future occurrence.</p>	10/17/84	
<p>3. The County did not demonstrate its ability to operate its decontamination center and relocation center at the Park City Mall. The plan for the operation of this facility should address the details of registration and possible decontamination of large numbers of evacuees in specific terms, taking into consideration the physical peculiarities of this facility (e.g., floor plan, location and number of showers, parking location, etc.). An exercise of the use of this facility with as little simulation as practical should be undertaken.</p>	J.12.	<p>3. Park City Mall is a planned reception center for Lancaster County, as defined in Paragraph IV.T., page 5 of Lancaster County plan. Exercise arrangements were made to demonstrate the capabilities of a contamination monitoring team at the reception center location. However, a demonstration of decontamination capabilities was not to be done at this site. A demonstration of a mass care center, along with its decontamination capabilities, was to be conducted at Pequea Valley High School as set forth in Annex M of the Lancaster County plan and announced in FEMA's narrative summary portion of the exercise scenario. As indicated on page 99 of the FEMA report, the FEMA observer was unable to visit the mass care center at the Pequea School complex where decontamination monitoring and registration could have been observed. This deficiency seems to be a result of a communications problem between Lancaster County, FEMA and FEMA staff members. In an attempt to eliminate confusion, FEMA will ensure that all contamination monitoring and decontamination procedures will be demonstrated within the facilities set forth in the county plan.</p>	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>STATE</u>				
1. Briefings of EOC personnel and the risk counties occurred wherever significant information became available. More frequent briefings are recommended, even if the situation has not changed since the last update.	J.9.	Briefings are conducted as required by evolving situations, not necessarily by schedule or a checklist requirement; however, the Emergency Action Assistants will endeavor to continually update their respectively assigned county and/or area when using the point-to-point circuit. Additionally, the Shift Leader will periodically update the emergency staff using the public address or other systems.	Feb.'84	Feb.'84
2. The Response Group Leaders should convene periodically to report their respective efforts so that each agency can have a clear picture of the total State response.	J.9.	Normally, the Response Group Leaders are fully briefed prior to, when required, during and at the changing of shifts at 7 a.m. or 7 p.m. Both the restrictive compression of scenario time and the redundancy of scenario actions required by nuclear facility exercises, tend to reduce briefing requirements for continuously trained staffing. Periodic briefings and reporting time will be recommended for inclusion in scenario preparation.	Feb.'84	Feb.'84
3. A status board should be maintained for significant State actions that have been undertaken or completed.	J.9.	The Significant Events status board, a function of Situation Analysis, will be used. This TMI exercise, however, had extensive evaluator requirements which precluded using any Situation Analysis personnel and the status board in the EOC.	Feb.'84	Feb.'84
4. A system for 24-hour staffing of the State EOC Media Center should be formally established.	A.4.	A system for 24-hour staffing of the State's Media Center has been established and is contained in Annex E of the Commonwealth's Disaster Operations Plan, Appendix 15, Section VI, Subsections B1 and B2. The staffing assignment to Commonwealth Press Secretaries and their staffs is made by the Press Secretary of the Commonwealth based on a request and recommendation from the PEMA Press Secretary. There are in excess of 50 state government press secretaries and deputy press secretaries within the state organization in the Harrisburg Capitol Complex. All have been briefed on their role in the Commonwealth's Emergency News and Information Center, and a total of 12 have been trained through actual disaster response as well as exercise experience. All are available to staff the Commonwealth's Emergency News and Information Center at the request of the PEMA Press Secretary and direction of the Commonwealth Press Secretary.	Feb.'84	Feb.'84

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A. above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
5. A status board is needed at the PEMA Central Area EOC.	J.9.	Central Area currently has a status board, which was inadvertently not used in the exercise. The staff, however, was periodically briefed concerning all significant plant information and requirements pertaining to host and support county operations.	Feb. '84	Feb. '84
6. A telephone instrument should be connected to the dedicated land line, and a transceiver should replace the transmit only RPU.	E.5.	Recently the Emergency Broadcast System was redesigned Commonwealth-wide. The cited dedicated circuit will have proper instrumentation to provide authorized Commonwealth officials the ability to activate and broadcast instructions using this system. The normal procedure for use of the Emergency Broadcast System in nuclear facility incidents or exercises is restricted to risk county authorized officials. The State EOC will have Emergency Broadcast System activation capability projected for May 1984 and final testing in August 1984.	May '84	Aug. '84
<p><u>ACCIDENT ASSESSMENT</u></p> <p>1. The new dedicated telephone system needs additional operational testing and refinement.</p>	F.i.d.	BRP recently attended a TMI orientation program at the new EOC. The problems with the new telephone system brought out by the exercise were discussed. The system evaluation is an ongoing project and there is no completion date.	Unknown	Unknown

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>MEDICAL SUPPORT</u>				
1. TMI should give Hershey Medical Center as much lead time as possible when transporting contaminated victims to the hospital.	L.4.	There appears to be a discrepancy in this statement as TMI received a call back from Hershey Medical Center at 14:40. The patient arrival time at the Medical Center was 15:30. Either the observer was given a wrong time or confusion may have existed with the time at Hershey Medical Center. This problem has been addressed and should be corrected during the next drill.	N/A	N/A
2. Berks County should continue to work with their hospitals in developing a coordinated plan to deal with radiological emergencies.	L.1.	After discussing this with the Berks County coordinator, it was decided in-service programs relating to radiological emergencies should be established for the three Berks County area hospitals. Plans will be formulated with the hospitals and the county coordinators to develop the programs. In this matter, hospital staffs can be instructed in proper methods of interactions with PEMA, Department of Health and county coordinators and other involved individuals and/or agencies. Since this is primarily a health matter, the Department of Health has agreed to initiate the development of such programs.	July '84	
3. York Hospital should exercise, either in conjunction with TMI or Peach Bottom, their capabilities to deal with a radiologically contaminated individual, utilizing the facilities designated for this process.	L.1.	York Hospital is addressing this problem. The disaster coordinator was absent from the hospital during the last exercise. The staff is eager to utilize their facility to the maximum delivery system and during future exercises will test their capabilities in treating radiologically contaminated individuals.	July '84	
<u>ACCESS AND TRAFFIC CONTROL</u>				
1. The initial briefing for PSP officers should include clear instructions on dosimetry and KI. Further, the briefing should include the location of evacuation assembly areas to which evacuees can be directed for shelter, decontamination, etc.	J.10.3. K.3.a. K.3.b.	Pennsylvania State Police officers gave appropriate answers to the FEMA observer's questions relating to dosimetry, except one officer forgot why KI is used. Our personnel received dosimetry refresher information during the briefing. All men assigned to TCPs and/or ACPs were issued one each of CD V-730 dosimeter, CD V-742 dosimeter, cardboard simulator TLD, paper simulator KI, Dosimetry-KI Report Form and Personnel Decontamination Monitoring Report Form. Additionally, all these men had in their possession clothing to implement the double clothing concept. Men assigned to TCPs and/or	6/1/84	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<p><u>ACCESS AND TRAFFIC CONTROL (continued)</u></p>		<p>ACPs were briefed on their decontamination station and medical center (hospital) locations. They were not briefed on evacuee assembly areas for sheltering, decontamination, etc. The public is supposed to be given this information via pre-distributed pamphlets from the utility company, PEMA, and/or the Risk County Emergency Management Agency. Also, this information will be broadcast via EBS and designated commercial radio/TV stations. It is unrealistic to expect officers directing long streams of traffic to answer ANY questions for the public. Instead, the motorists will not be permitted to stop but directed to follow the crowd. More likely than not, if a person learned of being contaminated, they would learn from the same source what to do and where to go for decontamination. However, if the officers at TCPs and ACPs must know all this information, PEMA, county emergency management agencies and/or utility companies should furnish the Pennsylvania State Police with sufficient pamphlets similar to those issued local residents providing evacuation instructions. PEMA will provide PSP with public information handouts depicting evacuation procedures, routes, reception center and mass care center locations.</p>		
<p>2. The availability of towing services should be coordinated between the municipalities (or counties) and the PSP.</p>	<p>J.10.k.</p>	<p>Personnel assigned to TCPs and/or ACPs are not expected to be familiar with every detail of the Pennsylvania State Police response plan and they are certainly not expected to know anything about a municipal response plan. These officers are not coordinators; however, these officers are given instructions that whenever they need information or assistance, they should contact their supervisor or staging area coordinator via radio. There is one Pennsylvania State Police Liaison Officer at each risk county EOC who is responsible for coordination between the Pennsylvania State Police and other agencies within the EOC/county. Pennsylvania State Police response plans include a list of towing services available in the risk county. In the event a towing service refuses to respond or is not available, this situation becomes an unmet need. Subsequently, the matter would be referred to the Pennsylvania National Guard.</p>	<p>Feb. '84</p>	<p>Feb. '84</p>



### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>ACCESS AND TRAFFIC CONTROL</u> (continued)				
3. Future exercises should include a field demonstration of the delivery of traffic control devices.	J.10.k.	The TMI plan does not include the use of traffic control devices. NOTE: The FEMA observer failed to locate the officer at the Dauphin County TCP #31 (I-81, Exit 26) because the officer went to TCP #26. He misunderstood Exit 26 with Post 26. If all TCPs were manned, this mistake would have been identified and corrected in short order.	Feb.'84	Feb.'84
<u>FIELD MONITORING</u>				
<u>Air Sampling</u>				
1. There was no information given to field monitoring team from BRP concerning updates of plant status, meteorological conditions, etc.	I.7.	The Bureau will give the air sampling teams more updated information.	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>Water Sampling</u>				
1. Samples of public water supplies should include sample of raw water and finished water.	I.7.	Concur. This will be done during forthcoming exercises.	N/A	N/A
2. Detailed procedures need to be developed for water sampling teams and the individuals involved in conducting the sampling need to be given adequate training in implementing these procedures.	I.7.	Water sampling procedures for field teams have been established and training in that area will continue.	N/A	N/A
<u>Agricultural Sampling</u>				
1. Sampling teams should be equipped with disposable plastic gloves for use during sampling.	I.7.	Field sampling teams have latex gloves available. Their availability will be demonstrated in future exercises and the gloves used in actual situations.	Feb. '84	Feb. '84
2. Radios should be made available to the agricultural sampling teams for continuous communications.	F.I.d.	Radio equipment, if it is necessary for the field teams, is earmarked along with dosimetry from PEMA equipment pool resources in the Agriculture Plan for Nuclear Power Generating Station incidents (Jan. 1980). For the exercise, issue of the radio equipment should have been simulated.	Feb. '84	Feb. '84
<u>DAUPHIN COUNTY</u>				
1. Dauphin County officials misinterpreted the initial notification message as an Unusual Event declaration, when in fact it was an Alert declaration. Additional training in the REP plan notification procedures should be provided for the Communications Center dispatchers, and other appropriate staff.	E.1.	There was no confusion among the Dauphin County personnel. At 13:50 hours Dauphin County received notification of an "Unusual Event." This notification was received from Robin Lane, TMI Control Supervisor and recorded on part of the exercise scenario. The report was reported to Dauphin County on the initiative of the TMI Control Room Supervisor. Dauphin County Dispatcher #11 received the message and immediately gave it to the Operations Officer. At 13:55 hours, Dauphin County received an "Alert" notification. The plant was merely updating the county as to its status. Although an Unusual Event was not required by the scenario, the Shift Supervisor exercised judgment as authorized by the Licensee Emergency Plan and declared an Unusual Event at 1350 hrs. Approximately five (5) minutes later, at 1355 hours, he escalated the event to an Alert classification based on having exceeded established Emergency Action Levels.	N/A	N/A

### SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>DAUPHIN COUNTY</u> (continued)				
<p>1. Internal coordination and information sharing among the Dauphin County EOC staff were not fully effective. A status board, a formal message logging and handling procedure and frequent staff briefings should be employed to improve the situation.</p>	J.9.	Due to the limited facilities at the County EOC, coordination and information sharing is extremely difficult. This situation will be corrected, upon completion of a new and adequate EOC. Completion date for the new EOC is scheduled for July, 1984.	July '84	
<p>1. Dauphin County received notification of the General Emergency declaration from PEMA prior to being notified directly by the facility. The plans, however, specify that TMI is to notify Dauphin County before contacting PEMA. This notification procedure should be reviewed, and the sequence and/or plans should be modified accordingly.</p>	E.1.	Dauphin County plan P.C-2, Para. F, states: For escalation to a General Emergency, Three Mile Island notifies BRP, Dauphin County, PEMA, and York, Lancaster, Cumberland, and Lebanon Counties. BRP notifies PEMA. PEMA confirms notification of Dauphin, York, Lancaster, Cumberland, and Lebanon Counties, and notifies PEMA's Central and Eastern Area Offices. Commonwealth of Pennsylvania Disaster Operations Plan, Annex E, P.E-3-A-4 states: Notification of General Emergency. The licensee will promptly inform State and local offsite authorities of general emergency status (parallel notification of state and local). The plans appear to be adequate; however, during the calling process, more than one person conducting the notification and/or busy phone lines contribute to out of sequence notifications and confirmations.	N/A	N/A
<p>1. Dauphin County considered the primary means of notifying risk municipal EOCs to be the fire radio network. Some municipal EOCs did not have direct access to this radio net, and some municipal EMCs did not consider this to be the "official" means of communication, and were reluctant to act on information or instructions so received until verified by telephone. This link should be evaluated, with consideration being given to substituting RACES as a more appropriate means of communication.</p>	E.1.	Initial notification would be made using Dauphin County's existing 24-hour operational radio networks set forth in Annex B of the Dauphin County plan. As set forth on page C-3, Para. 22 of the plan, the RACES back-up radio communications should prepare to open with municipal EOC's. The RACES Network will be the primary mode of communications after all EOC's are opened and operating. Clarification of this procedure will be made with the municipalities in regard to communications between the County EOC and the municipalities.	N/A	N/A

If you have any questions concerning the above, please contact Jim Asher at  
FTS 597-8664.

APPENDIX 7

ANNEX T

- AGREEMENT

This agreement, made this 10th day of March, 1930, by and between the Commissioners of Cumberland County acting for and on behalf of Cumberland County, Pennsylvania, hereinafter referred to as the County, and WHYL/WZUE of 1013 South Hanover Street, Carlisle, Pennsylvania, hereinafter referred to as the Radio Station.

1. Definition of Terms used in Agreement

1.1 Designated Officials. Where the word "Designated Officials" is used, it refers to the following persons:

- (1) Director, Cumberland County Office of Emergency Preparedness,
- (2) Cumberland County Public Information Officer,
- (3) Assistant Director, Office of Emergency Preparedness,
- (4) Shift Supervisor, Cumberland County Communications Center,
- (5) Cumberland County Board of Commissioners, or
- (6) Cumberland County Chief Clerk

1.2 Emergency. Where the word "Emergency" is used, it refers to a situation posing an extraordinary threat to the safety of life and property. Examples of emergencies include tornados, hurricanes, floods, earthquakes, icing conditions, heavy snows, energy widespread commercial power failures, large scale industrial expositions and fires, nuclear hazards, transportation accidents involving hazardous materials, and industrial accidents with possible severe environmental pollution effects.

2. The Radio Station agrees to permit Designated Officials to issue emergency information and instructions in threatened or actual emergencies within Cumberland County upon approval by the Radio Station to activate the Emergency Broadcast System.

3. Acceptance of this agreement by the Radio Station shall not be deemed as a relinquishment of program control and shall not be deemed to prohibit the Radio Station from exercising discretion and responsibility in any given situation.