



UNITED STATES
NUCLEAR REGULATORY COMMISSION

REGION IV

611 RYAN PLAZA DRIVE, SUITE 400
ARLINGTON, TEXAS 76011-8064

August 29, 1995

Entergy Operations, Inc.
ATTN: Ross P. Barkhurst, Vice President
Operations, Waterford
P.O. Box B
Killona, Louisiana 70066

SUBJECT: FEMA IDENTIFIED DEFICIENCIES AT THE JULY 12, 1995, WATERFORD 3
NUCLEAR STATION EXERCISE

Enclosed is a copy of the letter from Mr. R. L. "Buddy" Young, Federal
Emergency Management Agency (FEMA), Region VI Director, dated July 26, 1995,
which notified the State of Louisiana of Deficiencies identified during the
July 12, 1995, exercise with the Waterford 3 Nuclear Station.

There were four Deficiencies identified. Two Deficiencies were identified for
both St. Charles and St. John the Baptist Parishes when they failed to
demonstrate the capability to promptly, within 15 minutes, alert and notify
the public within the 10-mile plume exposure pathway emergency planning zone
and disseminate instructional messages to the public on the basis of decisions
by appropriate State or local officials. Two more Deficiencies were
identified when both Parishes failed to demonstrate the capability to
coordinate the formulation and dissemination of accurate information and
instructions to the public.

We request that you assist offsite officials with corrective actions as
required and track the State's corrective actions for these Deficiencies.
Please keep this office informed of the status of resolution of these issues.

Sincerely,

Rosight J. Chamberlain
for Ross A. Scarano, Director
Division of Radiation Safety
and Safeguards

Enclosure: As stated

Docket: 50-382
License: NPF-38

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

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Entergy Operations, Inc.

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Entergy Operations, Inc.
ATTN: Jerrold G. Dewease, Vice President
Operations Support
P.O. Box 31995
Jackson, Mississippi 39286-1995

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

Entergy Operations, Inc.
ATTN: D. R. Keuter, General
Manager Plant Operations
P.O. Box B
Killona, Louisiana 70066

Entergy Operations, Inc.
ATTN: Donald W. Vinci
Licensing Manager
P.O. Box B
Killona, Louisiana 70066

Chairman
Louisiana Public Service Commission
One American Place, Suite 1630
Baton Rouge, Louisiana 70825-1697

Entergy Operations, Inc.
ATTN: R. F. Burski, Director
Nuclear Safety
P.O. Box B
Killona, Louisiana 70066

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

Parish President
St. Charles Parish
P.O. Box 302
Hahnville, Louisiana 70057

Mr. William A. Cross
Bethesda Licensing Office
3 Metro Center
Suite 610
Bethesda, Maryland 20814

Entergy Operations, Inc.

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Winston & Strawn
ATTN: Nicholas S. Reynolds, Esq.
1400 L Street, N.W.
Washington, D.C. 20005-3502

Chief, Technological Hazards Branch
FEMA Region 6
Federal Regional Center
800 North Loop 288
Denton, Texas 76201-3698

DISTRIBUTION w/copy of letter dated July 26, 1995:

DMB (A045)
 WAT-3 Resident Inspector
 Branch Chief (DRP/D)
 Leah Tremper (OC/LFDCB, MS: TWFN 9E10)
 C. Patel, NRR Project Manager (MS 13 D10)
 G. M. Good, DRSS/RIB
 RITS Coordinator
 RIB Action Item File (Hodges)
 RIV File

DISTRIBUTION w/out copy of letter:

L. J. Callan
 Project Engineer (DRP/D)
 Branch Chief (DRP/TSS)
 C. A. Hackney, SLO
 T. Essig, NRR/DRPM/PERB (MS 9 H15)
 MIS System

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Federal Emergency Management Agency

Region VI

Federal Regional Center

830 North Loop West

Denton, TX 76201-8608

July 26, 1995

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

Dear Mr. Spell:

As required by 44 CFR 350.9(d), this letter provides official notice that FEMA's evaluation of the July 12, 1995, Radiological Emergency Preparedness Exercise at the Waterford 3 Nuclear Station, Killona, Louisiana, identified a total of four Deficiencies. These Deficiencies are being assessed against St. Charles and St. John the Baptist Parishes and involve the Alert/Notification and Public Instructions and Emergency Information activities (FEMA Exercise Objectives 10 and 11, as described in the FEMA Exercise Manual - FEMA REP-14, dated September 1991).

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

Both St. John the Baptist and St. Charles Parishes are assessed a Deficiency against Objective 10 and Objective 11 for a total of two Deficiencies for each Parish. A discussion of each Deficiency follows:

OBJECTIVE 10:

Neither of the risk parishes met the required 15-minute time limit for completion of all required items listed on page D.10-2 of FEMA REP-14.

St. Charles Parish split the Protective Action Recommendation (PAR) received from the utility into two separate evacuation and sheltering messages.

The evacuation portion of the PAR was provided to the EBS station 16 minutes after the decision and the sheltering portion followed five minutes later. As a result, of the split message, the alert and notification sequence was not completed until 43 minutes following the Protective Action Decision (PAD).

St. John the Baptist Parish delayed both the alert signal and initiation of the notification message until 31 minutes after their PAD.

Furthermore, the Parishes did not coordinate the timing of the alert signals (sirens) or the notification messages to be broadcast to the public. Uncoordinated decisions regarding the timing of Alert/Notification activation resulted in the sounding of sirens and initiation of initial notification EBS messages at different times in the two risk parishes. In addition, in St. Charles Parish, the EBS notification message was issued prior to the sounding of the alert signal.

It should be noted that the current Waterford 3 Alert/Notification System includes not only fixed sirens in the urbanized areas of both Parishes, but helicopter-borne loudspeaker systems using pre-designated routes to alert the sparsely inhabited areas of the Parishes, including swampland, hunting and fishing areas.

While St. John the Baptist Parish simulated the activation of this helicopter-borne alert system, St. Charles Parish chose not to simulate activation of this system to alert the transients.

CONVEYANCE III

The capability to coordinate the formulation and dissemination of accurate information and instructions to the public was not demonstrated.

Each of the two Emergency Planning Zone Parishes prepared separate, individual requests for transmission of protective action messages by the three EBS stations participating in the Waterford 3 Alert/Notification system. These individual messages were coordinated by telephone between the two Parishes, but not with the State EOC, the Emergency News Center or the Rumor Control Center in accordance with the Parish Plans.

During the exercise, variation from the pre-scripted messages that were previously provided to the participating EBS stations required the stations, rather than the Parish EOCs, to assemble a message from several places from within the EBS message book. This included selecting the proper geographic boundaries for the

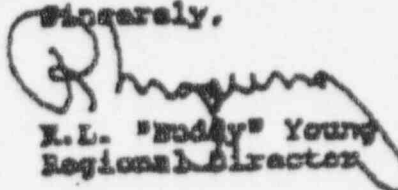
Parishes' designated Protective Action Sections. The stations did not adequately demonstrate these capabilities. In addition, because the Parishes do not actually compose the messages, they rely on either the Rumor Control Center or their own Media Monitoring capabilities to determine if the EBS messages are consistent with their Protective Action Decisions. Since neither of these actions were demonstrated, the Parishes were unable to confirm the accuracy of the EBS messages as required by REP-14.

Based on the preceding information, the Federal Emergency Management Agency (FEMA) has determined the existence of four Deficiencies. Because of the potential impact of Deficiencies on the protection of the public health and safety, they should be corrected within 120 days from the July 12, 1995 exercise through appropriate remedial actions, including remedial exercises, drills, or other actions.

You are requested to provide a written response to this notice of Deficiencies by August 7, 1995, outlining the schedule and proposed corrective actions that will be undertaken to resolve these issues. If you feel that a special meeting is necessary to discuss specific solutions to the problems addressed above, please advise us in your response.

As always, members of my staff stand ready to assist you in the resolution of these issues. Should you have any questions, or desire further assistance, please contact Bob Hendrix, Region VI RAC Chairman, at (817) 898-5118.

Sincerely,



E.L. "Eddy" Young
Regional Director

cc: O. Megs Hepler, FEMA HQ (PT-EX)
Charles Hackney, RAC XIV
Colonel William J. Croft, LOEP