



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

JUN 05 1984

Docket No.: 50-341

Dr. Wayne Jens
Vice President - Nuclear Operations
The Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Dear Dr. Jens:

Subject: FEMA Supplemental Interim Finding on Offsite Radiological
Emergency Planning for FERMI-2

We have received from the Federal Emergency Management Agency (FEMA) a Supplemental Interim Finding, dated May 14, 1984, on the offsite emergency planning for the Fermi-2 facility which is attached as an enclosure to this letter. FEMA's May 14, 1984, letter forwards the Supplemental Interim Finding dated April 30, 1984, prepared by FEMA, Region V. The subject FEMA report addresses the review and evaluation of the Brownstown Township Emergency Plan and the revised Monroe County emergency plan, including an evaluation of the impact of the revised Monroe County plan on the FEMA responses which were previously provided regarding the specific concerns raised in the Monroe County petition made pursuant to Section 2.206 of 10 CFR Part 2. In this regard, FEMA Region V states in its April 30, 1984, finding that the revised Monroe County emergency plan supports FEMA's previous responses to the specific emergency planning issues raised in the Monroe County petition. (Refer to Pages 13 through 15 of the April 13, 1984, FEMA Region V report).

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FEMA concludes, based on the review by Region V of the revised Brownstown Township and Monroe County site-specific offsite radiological emergency plans, there is reasonable assurance that the cited emergency plans are adequate and capable of being implemented in the event of an accident at the site. However, the April 30, 1984, FEMA report does identify some remaining inadequacies in the offsite emergency plans relative to some of the planning criteria items in NUREG-0654/FEMA-REP-1. In this regard, the State of Michigan has been requested to make additional corrective actions. Accordingly, we request you to continue to coordinate your emergency planning efforts with those of the appropriate off-site authorities to ensure that the inadequacies identified by FEMA Region V in its April 30, 1984 report are corrected in a timely manner. If you have any questions on this matter, please contact the Fermi-2 Project Manager, M. D. Lynch at (301) 492-7050.

Sincerely,

ORIGINAL SIGNED BY:

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

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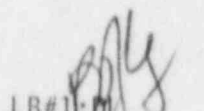
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Federal Emergency Management Agency

Washington, D.C. 20472

MAY 14 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. Kriem*
Richard W. Kriem
Assistant Associate Director
Office of Natural and Technological Hazards Programs

SUBJECT: Supplemental Interim Finding on Offsite Radiological Emergency
Planning for the Fermi Nuclear Power Plant, Unit II

Attached is a supplemental interim finding on offsite radiological emergency planning for the Fermi Nuclear Power Plant, Unit II. The report, titled "Supplemental Interim Finding, Enrico Fermi Atomic Power Plant, Unit #2" and dated April 25, 1984, was prepared by Region V of the Federal Emergency Management Agency (FEMA). These findings were prepared in response to your memorandum of March 28, 1984.

FEMA Region V has reviewed and evaluated the Brownstown Township plan and revisions, as well as the revised Monroe County Plan including an evaluation of the impact, if any, of the revised Monroe County Plan on the previously provided FEMA responses to the specific concerns raised in the Monroe County petition. Based on the Region V review of the revised Brownstown Township and Monroe County site-specific offsite radiological emergency plans, there is reasonable assurance that the plans are adequate and capable of being implemented in the the event of an accident at the site.

If you have any questions, 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 V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

APR 30 1984

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

Attention: Robert Turner - SI-NT-NH

FROM:

for Frank Finck
Edward Edwards, Sr.
Regional Director

SUBJECT: Enrico Fermi, Unit 2, Supplemental Interim Finding

This Supplemental Interim Finding is in response to the Nuclear Regulatory Commission's Memorandum of March 28, 1984, requesting the support of FEMA regarding an assessment of the adequacy of the revised working draft of the Monroe County plan including an evaluation of the impact, if any, of the revised plan on (1) the previously provided FEMA findings on the adequacy of off-site emergency preparedness for Fermi II, and (2) the FEMA response to the specific concerns raised in the Monroe County petition. The NRC, also, requested FEMA provide findings and determinations on the adequacy of the Brownstown Township emergency plan in order to support the NRC licensing review of Fermi II.

Since the January 31, 1983, Supplemental Interim Finding, a separate Brownstown Township plan has been developed and revised. In addition, the Monroe County emergency plan, titled "Appendix 1, Nuclear Facilities Procedures to the Monroe County Operations Plan," was, also, revised. As stated in the draft of the plan dated December 1983, the Monroe County plan has been substantially revised and expanded to reflect the specific needs of Monroe County and to define the use of the County's resources. This revision, though, has not changed the concept of operations within Monroe County. Therefore, it is the opinion of FEMA Region V that a second Public Meeting is not required.

FEMA Region V completed its informal review of the revised Brownstown Township and revised working draft of the Monroe County, Michigan, Radiological Emergency Preparedness Plan on April 24, 1984. Formal review by the Regional Assistance Committee of Brownstown Township, Wayne and Monroe Counties occurred February 10, 1983; January 21, 1982; and March 8, 1983, respectively. The reviews followed the planning standards and evaluation criteria format of NUREG 0654/FEMA REP-1, Revision 1, A through P.

Corrective actions taken by the State of Michigan, Brownstown Township, Wayne and Monroe Counties have resulted in most of the planning criteria items now being rated "adequate." Some planning criteria items are still rated "inadequate" and additional corrective actions have been requested of the State of Michigan.

The State of Michigan Radiological Emergency Preparedness plan has been exercised eleven (11) times during both full and partial exercises for the Big Rock Point, Palisades, Donald C. Cook, and Enrico Fermi, Unit II Nuclear Power Plants. The first joint full participation exercises for the Enrico Fermi, Unit II Nuclear Power Plant was February 2, 1982. The second joint full participation exercise is scheduled for June 27, 1984.

As a result of the foregoing evaluation, FEMA Region V is of the opinion the revised Brownstown Township and revised working draft of the Monroe County site-specific radiological emergency plans for the Enrico Fermi, Unit II, Atomic Power Plant are adequate and capable of being implemented to protect the population in the 10-mile inhalation zone and the 50-mile ingestion zone. This conclusion is based solely on the basis of a review of the revised Brownstown Township plan and the revised working draft of the Monroe County plan. Further evaluation of the State of Michigan, Wayne and Monroe Counties' ability to implement these plans were made as a result of the February 2, 1982, full participation exercise; the January 31, 1983, Supplemental Interim Report; and the two FEMA findings sent to the NRC dated July 18, 1983.

APRIL 25, 1984

SUPPLEMENTAL INTERIM FINDING

ENRICO FERMI ATOMIC POWER PLANT, UNIT #2

SITE SPECIFIC

OFF-SITE

RADIOLOGICAL EMERGENCY PLANNING FOR REVISED
BROWNSTOWN TOWNSHIP PLAN

AND
MONROE COUNTY PLAN

I. INTRODUCTION

- A. This document constitutes an update of the Interim Findings submitted to FEMA National on January 31, 1983, and updated July 18, 1983. It is in response to the March 28, 1984, Nuclear Regulatory Commission's request for FEMA findings on the revised Monroe County Emergency Plan and the Brownstown Township Emergency Plan relative to their adequacy of radiological emergency preparedness in the event of an accident at the Enrico Fermi Atomic Power Plant, Unit #2.
- B. The current Michigan Emergency Preparedness Plan (MEPP) is dated September 9, 1983. Revisions to the Michigan Emergency Preparedness Plan were submitted to FEMA Region V for review September 21, 1983. These revisions were in response to the RAC review Findings of May 3, 1983. FEMA Region V review findings of the revisions reflected in the current Michigan Emergency Preparedness Plan were provided the State of Michigan.
- C. The Regional Assistance Committee on February 10, 1983, completed its review of the Brownstown Township Plan and RAC review comments were provided the State of Michigan March 10, 1983. The State of Michigan used the RAC review comments to revise the Brownstown Township Plan and submitted these revisions to FEMA March 9, 1984. FEMA review comments on these Brownstown Township revisions were mailed to the State of Michigan April 24, 1984.
- D. In the aftermath of the public meetings, the Monroe County Board petitioned the Nuclear Regulatory Commission for leave to intervene and to reopen the supplement contentions before the Atomic Safety and Licensing Board (ASLB). The ASLB denied Monroe County's petition and on December 21, 1982, the Atomic Safety and Licensing Appeal Board affirmed the ASLB's denial. It is our understanding the Appeal Board did request the NRC staff to confer with FEMA and to investigate the County's concerns. In a letter dated July 18, 1983, FEMA Provided written responses to the Nuclear Regulatory Commission concerning the specific emergency planning issues raised by Monroe County.

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The Monroe County Board of Commissioners also requested a meeting with FEMA to discuss their planning concerns. This meeting between Monroe County Board officials and officials from the State of Michigan and FEMA occurred March 1, 1983. It is our understanding subsequent meetings were conducted between Monroe County and officials from Fermi II regarding these same issues.

The State of Michigan on February 29, 1984, submitted to FEMA and the Regional Assistance Committee for informal review a single draft working copy of the revised Monroe County Plan entitled, "Appendix 1, Nuclear Facility Procedures to the Monroe County Operations Plan." Due to recent revisions to the working procedures of the Regional Assistance Committee, FEMA Region V conducted an informal review of this draft working document. FEMA review comments of this document were mailed to the State on April 24, 1984.

- E. The second full participation exercise to test the State Plan and local site-specific plans for Enrico Fermi Atomic Power Plant, Unit #2, is scheduled for June 26-27, 1984. Exercise activities will involve the Wayne County Emergency Operations Center (EOC), the Brownstown Township EOC, the Monroe County EOC, the Joint Public Information Center (JPIC), the State On-Scene EOC, and the State of Michigan primary EOC in Lansing, Michigan. Copies of the draft working copy of the revised Monroe County Plan were provided the RAC on April 20, 1984. Revisions to the Michigan Emergency Preparedness Plan, as well as the Wayne County and Brownstown Township Plans, were mailed to the RAC March 26, 1984.

II. EVALUATION

The following evaluation addresses the revised Brownstown Township Emergency Operations Plan and the working draft of the revised Monroe County Plan entitled, "Appendix 1, Nuclear Facility Procedures to the Monroe County Emergency Operations Plan," and follows the planning standards and evaluation criteria format of NUREG 0654/FEMA REP-1, Revision 1, A through P.

A. Assignment of Responsibility

The Brownstown Township and the Monroe County revised plans identify the State, local, Federal and private sector organizations that are intended to be part of the overall response organizations for the emergency planning zones. Both plans include concepts of operation for each organization and suborganization having an operational role and their relationship to the total effort. However, some concept of operation in the Monroe County plan are in conflict with the Michigan Emergency Preparedness Plan (MEPP) i.e., Appendix 1, to the Radiological Defense Annex should be reworked in consultation with the State. The plan states that Monroe County will be responsible for a number of response areas which are routinely a State function per the MEPP. The plans include an illustration of organizations and suborganizations and

their interrelationships in a block diagram; specify a specific individual, by title, who is in charge of the emergency response; provide for 24-hour per day emergency response, including 24-hour per day manning of communication links. Both plans, by use of a table of primary and support responsibilities, using the respective response agencies as one axis and the functions as the other, specifies the functions and responsibilities for major elements and key individuals by title of emergency response.

The plans list Act 390 of the Public Acts of 1976, the Emergency Preparedness Act; the Charter Township of Brownstown Emergency Preparedness Resolution dated August 17, 1971; and the Monroe County Emergency Preparedness Resolution dated February 13, 1974, as the legal basis for their authorities.

The Brownstown Township plan includes signature pages to verify agreements between Brownstown Township agencies having an emergency response role within the EPZ. Appendixes refer to the concept of operations, specify the arrangements for exchange of information, and identify the emergency measures to be provided and the mutually acceptable criteria for their implementation. According to the Monroe County plan, the county is in the process of developing letters of agreement and/or statements of understanding with emergency response support and other organizations. The plan also contains unsigned signature pages that serve to verify agreements between county emergency response organizations.

B. On-Site Emergency Organization

The criteria does not apply to off-site planning and it is not addressed herein.

C. Emergency Response Support and Resources

Procedures for requesting Federal assistance are defined in both the Brownstown Township and Monroe County Plans. Federal assistance and resources used to support the Federal response will be coordinated through the State organization. A utility representative will be present in the Monroe County Emergency Operations Center to provide liaison rather than dispatch a Monroe County representative to the utility Emergency Operations Facility (EOF). The Brownstown Township Plan calls for a liaison from Wayne County to be in the utility EOF. Liaison representatives from Brownstown Township and Wayne County are exchanged and present in both the Brownstown Township and Monroe County EOC's. Plans state information from the EOF will be transmitted directly to the State On-Scene Emergency Operations Center and to the Monroe County Emergency Operations Center via the State liaison. The State of Michigan will have a representative at the utility Emergency Operations Center.

The Brownstown Township Plan states "Nuclear and other facilities, organizations, and individuals that can be relied upon in an emergency

will be contacted through the State." The Monroe County Plan states the County Office of Civil Preparedness has entered into or is in the process of developing letters of agreement and/or statements of understanding with support organizations. The letters of agreement will be maintained on file at the Monroe County EOC. These letters of agreement need to be completed or the Monroe County plan revised to describe the State's position that letters of agreement are not necessary under Act 390. The Michigan Department of Health is in the process of developing procedures to identify nuclear and other facilities, organizations or individuals which can be relied upon to provide assistance in the event of an accident at the Enrico Fermi, Unit #2, Atomic Power Plant.

D. Emergency Classification System

Both the Brownstown Township and Monroe County Plans provide for emergency classification and action level scheme consistent with that of the licensee and as described in NUREG 0654/FEMA REP-1, Revision 1. Throughout the Monroe County Plan the first class of emergency action levels is identified as "Unusual Event." It has been recommended the next revision of plan be changed to the full title in NUREG 0654/FEMA REP-1, Revision 1, to "Notification of Unusual Event." Both plans also include procedures that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account local off-site conditions that may exist at the time of the emergency.

The Michigan Emergency Preparedness Plan provides for an emergency classification and action level scheme consistent with that of the licensee and as described in NUREG 0654/FEMA REP-1, Revision 1. The Michigan Department of Public Health has issued an interpretive statement for clarification that, in effect, interprets the Michigan Department of Public Health Peacetime Nuclear Incident Rules of 1977 to be consistent with the emergency classification scheme described in NUREG 0654/FEMA REP-1, Revision 1. This issue is discussed in the April 22, 1982, Interim Report. The Michigan Department of Health's attempt to legally change their Peacetime Nuclear Rules of 1977 to the system described in the Michigan Emergency Preparedness Plan is still in process.

E. Notification Methods and Procedures

The notification entry point for Brownstown Township is the Fire Department, which is notified by way of the following chain: (1) Plant Operator to (2) Monroe County Sheriff to (3) City of Flat Rock Police Department to (4) Brownstown Township Fire Department. Means of verification of messages(s) is a single call back. Notification procedures are consistent with emergency classification and action levels.

The Plant Operator is required to promptly notify the Michigan State Police Post and the Monroe City/County Joint Communication Center, both 24-hour a day response organizations. The Communications Center will be notified by dedicated telephone line or by State Police radio frequency as an alternate source. Both the Brownstown Township and Monroe County Plans contain procedures for alerting, notifying and mobilizing emergency response personnel. A paging system is in operation to allow 24-hour per

day notification. Also upon notification, the Monroe City/County Communications Center will immediately notify the Flat Rock Police Department in Wayne County, a 24-hour response organization. The Flat Rock Police Department will then initiate notification procedures within Wayne County.

Upon notification by the County Chairperson that public protective actions are necessary and authorized, the Monroe County Public Alert/Notification System is activated. This will include as appropriate: Activation of EBS; activation of the Detroit Edison Notification Siren System to alert the public to tune to the EBS station for emergency information; initiation of route alerting procedures in the event of siren failure; initiation of notification procedures for the hearing impaired; notification of boaters within three miles of shore during the boating season, through the Marine Division of the Monroe County Sheriff Department and the U. S. Coast Guard; notification of transient persons at recreational areas and work areas by the Sheriff's Department; and notification of the ports, railways, and airports.

The Prompt Alert/Notification System (outdoor warning) has been installed by the utility since the last Supplemental Interim Report dated January 31, 1983. The Prompt Notification System is also complemented by special warning devices installed in schools, hospitals, and other special institutions and high noise areas. The preliminary design of the system has been submitted to FEMA for review after which a date will be set for the Alert and Notification Demonstration Certification Test as outlined in FEMA-43. The siren system will not be sounded during the June 26-27, 1984, full participation exercise.

Both Brownstown Township and Monroe County Plans include written messages intended for the public that are consistent with the licensee's classification scheme. The draft messages provide instructions with regard to specific protective actions to be taken by occupants of affected areas, including the appropriate aspects of sheltering, ad hoc respiratory protection, thyroid blocking, and evacuation.

F. Emergency Communications

Monroe County is capable of communications with the Enrico Fermi Nuclear Plant at all times through a direct telephone line between the plant control room and the Joint Monroe City/County Communications Center, a 24-hour facility. Backup communications are provided for through a permanently installed radio transceiver at the plant on the frequency of the County Sheriff's network. The Brownstown Township includes provisions for a 24-hour per day notification to and activation of the Brownstown Township emergency response network. The communications link is telephone (primary) and police/fire radio (alternate).

Both Brownstown Township and Monroe County Plans have provisions for communications with contiguous State/local governments within the Emergency Planning Zones. Communications with Federal officials will be handled through the State EOC initially and then through the State

On-Scene Emergency Operations Center once it is established. The plans contain provisions for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local EOC's. The State On-Scene Emergency Operations Center retains responsibility for communications with the State radiological monitoring teams. Provisions are provided for alerting and activating emergency personnel in the response organizations, as well as provisions for a coordinated communications link for fixed and mobile medical support facilities. Communications between the utility, local and State EOC locations are tested on a monthly basis.

G. Public Education and Information

The Brownstown Township and Monroe County Plans provide on an annual basis, a coordinated dissemination of a public information pamphlet regarding how they will be notified and what their action should be in an emergency, and who to contact for further information in the event of an incident at Fermi II. In addition, residents of the primary EPZ are mailed periodic newsletters. Information specifically for transients will be placed at public telephones, hotels/motels, recreational areas, and other locations within the EPZ that are likely to be used by transients. The Monroe County Community College is the location for the Joint Public Information Center (JPIC). The State, Brownstown Township, Wayne and Monroe Counties, and the utility each have a designated spokesperson represented at the JPIC. Provision is made for each of the State and local Public Information Officers to have access to their EOC staff. Sufficient space is provided for the news media at the JPIC. Special communications channels are identified at the JPIC where the public can receive personalized information. Telephone lines to the JPIC will be used to control rumors, answer questions, and provide technical advice.

A joint news media briefing was conducted by State, County, utility, and FEMA Region V representatives in January, 1982. Another joint news media briefing to be conducted jointly by representatives from the State, County, and utility will be conducted June 25, 1984.

H. Emergency Facilities

The Brownstown Township plan states the EOC is located at 21313 Telegraph, Trenton (Township Hall). The Monroe County EOC is located at the Office of Civil Preparedness, 106 East First Street, Monroe, Michigan. The plan further states a new Monroe County EOC is being planned that will be outside the primary Emergency Planning Zone. The plans reflect the EOCs and the JPIC are adequately staffed.

The State Department of Public Health has the primary responsibility for radiological monitoring and assessment. Brownstown Township, Monroe and Wayne Counties radiological monitoring equipment is limited

in capability and is intended to be used for supportive programs. Information on the provision of radiological monitoring equipment in the vicinity of Fermi II will be contained in the Michigan Department of Public Health (MDPH) tabs for the Fermi II site. The MDPH tabs are presently in the developmental stage.

The RADEF Officer for Brownstown Township and Monroe County will inspect, inventory, and operationally check equipment/instruments at least once each quarter and after each use. Sufficient reserves of instruments/equipment to replace those which are removed for calibration or repair will be maintained and such calibration shall be at intervals recommended by the equipment suppliers.

The Brownstown Township plan contains a listing entitled, "Wayne County Radiological Resource Inventory." The listings are designated as survey meters. The plan defers to the Michigan Department of Public Health for radiological monitoring needs. The MDPH tabs for Fermi II is currently under development. The Monroe County plan does not include identification of emergency kits. It cross references a list of anticipated equipment needs for response agencies and an attachment on the notification, alert, and mobilization procedures for the Damage Assessment Officer. The State On-Scene Emergency Operations Center will be the central point for receipt and analysis of all field monitoring data.

I. Accident Assessment

Initially the utility will provide monitoring information to the counties and the State EOC. Once State resources are activated, the Michigan Department of Public Health will assess the situations and provide guidance to the counties concerning protective actions. The Brownstown Township plan describes the limited capability and resources for radiation detection, leaving the major responsibilities to the Michigan Department of Public Health. The Monroe County plan, although perhaps not intended, gives the impression the County has the ability to assess radiological releases, including incident assessment, plume monitoring and protective action measures. The plan should be changed during its next revision to reflect the county's limited capability and MDPH responsibilities. Listings of equipment for detection purposes at reception, congregate care, decontamination centers and other emergency workers is included in the plan.

The methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of radiological hazards through liquid or gaseous pathways is the responsibility of the Michigan Department of Public Health. Tabs for the Fermi site is currently under development by the Michigan Department of Public Health.

J. Protective Response

The Brownstown Township and Monroe County plans include protective action guides and other criteria consistent with the recommendations of EPA regarding exposure resulting from passage of radioactive airborne plumes and recommendations of DHHS/FDA regarding radioactive contamination of human food and animal feeds. The plans include maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points. The Brownstown Township plan also includes maps showing relocation centers in host areas and sheltering areas. The Monroe County plan contains only a list of relocation centers. The maps showing relocation centers and shelter areas is missing from the Monroe County plan. Both plans include maps showing population distribution around the nuclear facility by evacuation areas in a sector format. Means are described for notifying all segments of the transient and resident population; protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

Both plans state the Michigan Department of Public Health is responsible for directing the use of radioprotective drugs for the general population, emergency workers, and institutionalized persons within the plume exposure EPZ. The Brownstown Township plan states the MDPH maintains a quantity of potassium iodide at its central office and a supply will be transported to Brownstown Township. The drugs would then be distributed by the Wayne County Health Department. The Monroe County plan states a quantity of potassium iodide is maintained within the county at a secure location. The Monroe County Health Department would coordinate distribution.

The primary means of evacuation will be by private vehicle. Buses will supplement this means for those who have no transportation. Persons requiring specialized transportation will be provided special services. Listings of relocation centers are five (5) to ten (10) miles beyond the plume EPZ. Both plans also include projection on traffic capacities of evacuation routes under emergency conditions. The Brownstown Township Police Department and Wayne and Monroe Counties Sheriff's Department will coordinate access control personnel at major arteries requiring access control. The Michigan State Police will provide supplemental personnel for access control when mobilized. The Road Commissioner and Public Works Department will assist law enforcement in placing barricades at secondary access control points not requiring staffing. The Coast Guard will control access to the area by water as coordinated by Wayne and Monroe Counties law enforcement agencies. The plans include identification of and means for dealing with potential impediments to use of evacuation routes and contingency measures are described. The plans also contain time estimates for evacuation of various sectors and distances based on a time motion study extracted from "PRC Voorhee's Study, Preliminary Estimate of Evacuation Times."

Both plans describe the means for registering and monitoring evacuees at relocation centers in host areas. Personnel and equipment available will be capable of monitoring all residents and transients in the plume EPZ arriving at the center within approximately 12 hours.

K. Radiological Exposure Control

Both Brownstown Township and Monroe County plans indicate the Radiological Defense Officer will coordinate the distribution of dosimetry, both self-reading and permanent record devices, to emergency workers. The RDO is also responsible for maintaining a record of exposure for all emergency workers and seek to control the amount of exposure received by emergency workers. Plans describe provisions for 24-hour per day capability to determine doses received by emergency personnel involved in any nuclear accident. Provisions are included to ensure dosimeters are read at appropriate frequencies and provide for maintaining dose records.

Emergency worker exposure criteria is established by the MDPH in accordance with the EPA general public protective action guides. Both plans state the maximum dose to emergency workers will not exceed 25 REM whole body. Exposure beyond this limit will be on a voluntary basis and then only for lifesaving purposes. Both plans specify action levels for determining the need for decontamination; have established the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.

L. Medical and Public Health Support

The Brownstown Township plan includes a listing of local and backup hospitals and medical services having the capability for evaluation of radiation exposure and uptake. The Detroit Edison Company provides annual training to evaluate radiological exposure and uptake and to prepare those facilities to handle contaminated persons. The Brownstown Township plan provides for arrangements for transporting victims of radiological accidents to hospitals.

The Monroe County plan indicates that arrangements with local and backup hospitals and medical services are still in the developmental stages within the county. Specific arrangements for transporting victims of radiological accidents to medical support facilities have not been identified in the plan (i.e., ambulance services, etc.). However, the plan states, "The emergency transportation resources within the county will be fully utilized to support on-site and off-site requirements and to maintain adequate levels of emergency services capability during an incident."

M. Recovery and Reentry Planning and Post Accident Operations

The Brownstown Township and Monroe County plans state the MDPH will provide recommendations to the Governor on reentry decisions. The Governor will make the decision on allowing reentry. The means by which decisions to relax protective measures are reached is described in the Michigan Emergency Preparedness Plan. The Brownstown Township plan calls for township departmental emergency responsibilities to be defined in the appropriate annexes. Review of the annexes shows reentry and recovery is not addressed.

The Monroe County plan states procedures for reentry will be directed by the County Board Chairperson and coordinated by the Monroe City/County Civil Preparedness Director/Coordinator.

N. Exercises and Drills

Both Brownstown Township and Monroe County plans indicate tests and exercises will be conducted as required. Definition of an exercise, according to NUREG 0654/FEMA-REP-1, Revision 1, is included in the plan. Exercise requirements are described to mobilize State and local personnel and resources to adequately verify the capability to respond to an accident scenario requiring response. The plans further state the scenarios will be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five year period and that times of exercises will be varied. The full participation exercise conducted February 2, 1982, was conducted during a severe winter storm. The next full participation exercise is scheduled for June 26-27, 1984.

The plans provide for communications drills with State and local governments within the EPZ to be tested monthly; and communications between the nuclear facility, State, and local EOC's and assessment teams to be tested annually. Provisions are made in the plans for a medical emergency drill involving a simulated contaminated individual to be held annually with participation by local support services. The Brownstown Township and Monroe County RADEF organizations will participate with the Michigan Department of Public Health in the required radiological monitoring drills appropriate to Fermi II.

Both plans quote the NUREG 0654/FEMA-REP-1, Revision 1, criteria on the information that must be included in exercise scenarios. Both plans state the Emergency Preparedness Director/Coordinator will evaluate Federal observer and participant comments on areas needing improvement and will incorporate recommended changes in the plan.

O. Radiological Emergency Response Training

The State of Michigan Nuclear Incident Training Program has been revised since the January 31, 1983, Supplemental Interim Report. The Emergency Management Division, Department of State Police, coordinates all nuclear emergency response training programs, held within the State, for State and local officials. This training program is conducted jointly by the State of Michigan, local government, and utility training officials. The training program is in four parts:

1. Basics of Radiation and Plant Operations (utility)
2. Biological Effects and Detection of Radiation (Michigan Department of Radiological Health)
3. Radiological Emergency Response (Emergency Management Division, Michigan Department of State Police)
4. County Radiological Emergency Preparedness Plan (county)

See attachment for more complete description.

Brownstown Township and Monroe County plans describe local training programs for emergency response personnel. The Fermi II officials provide site specific emergency response training for those off-site emergency organizations who may be called upon to provide assistance in the event of an emergency as part of the local and State training programs. Training programs are also offered to other departments and agencies not directly affected but which could become involved through mutual aid agreements. The State and local plans also provide for specialized initial and periodic retraining for the categories of emergency response personnel listed in NUREG 0654/FEMA REP-1, Revision 1.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

Both Brownstown Township and Monroe County plans identify, by title, the individual with overall authority and responsibility for radiological emergency planning. For Brownstown Township this is the township supervisor and in Monroe County this is the chairperson of the Monroe County Board of Commissioners. The Brownstown Township Emergency Preparedness Coordinator has responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations. The Monroe City/County Civil Preparedness Director/Coordinator is responsible for emergency planning, updates, and overall coordination of emergency operations in Monroe County. These individuals are also responsible for certifying the plans are current on an annual basis. Planning personnel training is

provided for in the plans. Supporting plans are listed in both plans. Each plan does contain a specific table of contents and a cross reference to the NUREG 0654/FEMA REP-1, Revision 1, planning criteria items. However, the cross reference index in many cases is incorrect. Brownstown Township and Monroe County plans also contain an appendix listing, by title, Procedures Required to Implement the Plan, including sections of the plan to be implemented by each procedure. The MEPP Basic Plan, Appendix 1, describes Public Act 390 and the provisions contained therein to activate emergency response. The Michigan Emergency Services Division maintains that the simple procedure required to implement the plan does not warrant an appendix to satisfy planning criteria item P.7.

III. SUMMARY

Preceding evaluations have found the State of Michigan, Wayne and Monroe Counties' Emergency Plans are adequate and capable of being implemented and the February 2, 1982, full participation exercise demonstrated that off-site preparedness is adequate to provide reasonable assurance that appropriate measures can be taken to protect health and safety of the public living in the vicinity of the Enrico Fermi, Unit #2, Atomic Power Plant in the event of a radiological emergency. These preceding evaluations were based on Regional Assistance Committee reviews of the State of Michigan, Wayne and Monroe Counties' plans and their revisions, evaluation of a full participation exercise, and FEMA responses provided the Nuclear Regulatory Commission regarding specific emergency planning concerns raised in petition to the NRC by Monroe County.

This evaluation is based on the development of a separate Brownstown Township plan and its revisions and the revised Monroe County plan, including an evaluation of the impact, if any, of the revised Monroe County plan concerning the FEMA responses to the specific concerns raised in the Monroe County petition. The Regional Assistance Committee conducted a review of the separate Brownstown Township plan February 10, 1983, and the RAC plan review consensus document was mailed to the State of Michigan March 10, 1983. Revisions to both the Brownstown Township and Monroe County plans were mailed to the State of Michigan April 24, 1984. It is noted that there are no remaining deficiencies of a magnitude which would impede the health and safety of the population in the vicinity of the Enrico Fermi, Unit #2, Atomic Power Plant.

SUPPLEMENTAL INTERIM REPORT CONCLUSION

It is currently felt that problems found in the plans and implementing procedures are such that once corrected would serve to improve upon the overall emergency response capability.

As a result of the foregoing evaluation, FEMA Region V is of the opinion the revised Brownstown Township and Monroe County site-specific radiological emergency plans for the Enrico Fermi Atomic Power Plant, Unit 2, are adequate and capable of being implemented to protect the population in the 10-mile inhalation zone and the 50-mile ingestion zone.

Exceptions of the plans to the criteria found in the planning guide, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, NUREG 0654/FEMA REP-1, Revision 1, have been discussed in this and previous evaluation reports. Accordingly, any new information discovered as a result of additional Regional Assistance Committee reviews and meetings with Monroe County officials will be submitted to FEMA as a supplemental finding or part of the Regional Director's Evaluation.

FEMA responses to the specific concerns raised in the Monroe County petition remain the same except for Assertion #3 and #6. Revisions to the Monroe County plan provide additional clarification and definition of responsibilities during recovery and reentry, and whether potassium iodide supplies can be made available quickly.

ASSERTION #3: Monroe County lacks sufficient funds or expertise to undertake recovery and reentry operations.

Discussion: Revisions to the Monroe County plan on pages BP-1-21 and 22 state:

"Reentry and Recovery

1. The Michigan Department of Public Health will provide recommendations to the Governor on reentry decisions. Refer to Tab 119 to Attachment I to Appendix 1 to Annex S of the Michigan Emergency Preparedness Plan for specifics. When the radiation dose levels fall below the established limits, protective measures will be relaxed and preparation for recovery begun.
2. Procedures for reentry will be directed by the Chairperson of the Board and coordinated by the Monroe City/County Civil Preparedness Director/Coordinator. All departments with emergency responsibilities will carry out their assigned tasks according to appropriate Annexes and supporting procedures.
3. The Monroe County responsibilities for reentry and recovery include:
 - a. Assessment of local conditions including determination of State and/or Federal assistance needed to facilitate reentry and recovery activities.
 - b. Scheduling, controlling and coordinating reentry based on recommendation of the Michigan State Police/Emergency Management Division.
 - c. Providing public information concerning reentry/recovery actions.

- d. Preparing a summary report of county emergency operations.
 - e. Recommendations for further actions and changes to the local "Emergency Operations Plan."
4. When it is determined by the Chairperson, Monroe County Board of Commissioners that County resources (personnel and equipment) are inadequate for reentry/recovery activities, the State and/or Federal governments will be requested to provide assistance in the following areas:
- a. Decontamination of persons, property and food,
 - b. Security of evacuated areas to prevent unauthorized entry and vandalism.
 - c. Long-term health and medical services required for evacuees as a result of the emergency.
 - d. Extended social services.
 - e. Transportation.
 - f. Engineering support.
5. Offsite radioactive waste disposal and long-term monitoring are responsibilities of the Michigan Department of Public Health."

Conclusion: FEMA Region V finds the revisions to the Monroe County plan recognizes the limited capability of the county in this area and outlines where and how additional resources and expertise can be obtained. FEMA Region V finds the concerns raised in this assertion have been recognized and that planning is adequate.

ASSERTION #6: Monroe County questions whether potassium iodide supplies can be made available quickly.

Discussion: Monroe County's petition stated, "supplies of potassium iodide are to be warehoused at a central location under the control of the Michigan Department of Public Health (MDPH). Under the MDPH's scheme, potassium iodide would be distributed only after a radiological emergency was under way. Such a distribution is unlikely to be timely or effective, thus seriously imperiling the health of EPZ residents and emergency workers."

The MDPH states, "Local Health Department Directors or Health Officers are encouraged to develop and implement plans for the acquisition, storage, and distribution of potassium iodide tablets for local emergency workers and the general public based upon guidance which has been provided by the Department."

The Monroe County plan previously stated, "The Michigan Department of Public Health maintains a quantity of potassium iodide at its central office. When an incident occurs, this supply will be transported to the local area. The MDPH also has contacts from which additional drugs can be obtained for distribution to the general public. The Director of the Monroe County Health Department will distribute the drugs."

Revision to the Monroe County plan on page J-1-5, Section V, E.1.a states the Monroe County Department of Public Health maintains a quantity of potassium iodide at a secure location within the county for emergency workers....and contacts from which additional radioprotective drugs can be obtained and distributed to the general public. The Director of the Monroe County Health Department will coordinate distribution.

Conclusion: FEMA Region V finds the revisions to the Monroe County plan recognizes Monroe County's concerns in this issue and that planning for this assertion is adequate.