



Federal Emergency Management Agency

Region IV 1375 Peachtree Street, NE Atlanta, Georgia 30309

DOCKETED
USNRC

August 9, 1983

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Mr. Joshua P. Moore, Director
South Carolina Emergency Preparedness
Division
Rutledge Building
1429 Senate Street
Columbia, SC 29201

I-EP-30 5/9/84

DOCKET NUMBER *50-413/414 06*
PROD. & UTIL. FAC.

Dear Mr. Moore:

Enclosed for your review are the Regional Assistance Committee's (RAC's) informal evaluation comments on the Off-Site Radiological Emergency Response Plans for the Catawba Nuclear Station. These comments are submitted to your office for appropriate action.

The evaluation comments are the result of RAC meetings held on July 26-27, 1983, and represent concurring opinions of all representatives of agencies present (i.e., FDA, EPA, NRC, and FEMA).

Should you have questions or need clarification on any of the items, please contact John Heard at (404) 881-3442.

Sincerely,

Glenn C. Woodard, Jr., Chief
Natural and Technological
Hazards Division

Enclosures

NUCLEAR REGULATORY COMMISSION

Docket No. *50-413/414* Official Ex. No. *Int EP-30*
In the matter of *Duke, Catawba 1 & 2*

Staff _____ IDENTIFIED
Applicant _____ RECEIVED
Intervenor _____ RECORDED _____
Contractor _____ DATE *5/9/84*
Other _____ WITNESS _____
Reporter *M. Metzger*

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PDR ADOCK 05000413
G PDR



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NUREG ITEM

COMMENT

(Note: Correlate with cited "Applicability and Cross-Reference to Plans")

- A.1.a. Statement in IV.c. (York Co. Plan)^{rc} municipalities' responsibilities is inconsistent with organizational concept on page iii, Section III.
- A.1.b. Cross-reference inaccurate. (Possibly Q, pp. 54-55)
- A.1.c. Cross-reference inaccurate.
- A.2.b. Legal basis ambiguous in that it doesn't specifically include radiological hazards.
- A.3. Letters of Agreement for several private sector organizations are missing. Also, agreements should "---identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information."
- A.4. Cross-reference inaccurate.
- C.2.a. Cross-reference inaccurate.
- C.3. State Plan should be referenced.
- C.4. Cross-reference inaccurate; also, some private sector L.O.A.s missing.
- E.1. No reference for message verification.
- E.2. Cross-reference - Table E, Page C-13.
- E.6. Needs statement: "Final acceptance of the A & N systems is pending final FEMA guidance."
- E.7. Sample release for General Emergency includes unnecessary technical information, e.g., curies and projected doses. Was ad hoc respiratory protection considered in development of messages? (No. 4, page d-11)
- G.1. No plant brochure.

NUREG ITEM (con't)

COMMENT (con't)

- G.2. No brochure.
- G.4.c. No arrangements for rumor control.
- G.5. No programs indicated for acquainting news media with emergency plans. (First cross-reference not included).
- H.11. Emergency equipment not listed for York County.
- J.10.a. Evacuation routes within 10-Mile EPZ not marked on Radiological Emergency Response Map; also, radiation monitoring points are not indicated.
- J.10.c. See E.6. comment.
- J.10.d. Plan does not indicate the County has identified the mobility-impaired. Plan does not define "special facilities." (e.g., Q-28, item C-8)
- J.10.k. Plan needs clarification of procedures by which the transportation coordinator deals with special evacuation problems. Potential impediments in evacuation routes not addressed.
- J.12. Need more description (procedures) of the means for registration and monitoring.
- K.3.a. No provision made for permanent record devices or 24-hour capability to determine dosage.
- K.3.b. No prescribed frequency for reading and recording dosimeters.
- K.5.a. No action levels established for decontamination.
- K.5.b. Not adequately addressed.
- N.2.d. No provision for drilling of County personnel who have monitoring responsibilities as listed in Q-29.
- N.4. Clarification of critique procedure is needed. Plan does not mention a critique as soon as practicable after an exercise.
- N.5. The means and management controls for implementing corrective actions are not specified.

NUREG ITEM (con't)

COMMENT (con't)

- O.1.b. If mutual aid agreements exist, the training of the personnel listed on page Q-39 should be included.
- O.4.j. The York County plan identifies training for the P.I.O.; however, this person is not usually responsible for, or involved in, the transmission of emergency communications. This appears to be the wrong emergency response role for the training.
- P.2. Cross-reference inadequate. Individual not specified as "person responsible for REP planning."
- P.5. Not addressed.
- P.8. Errors exist. Some have been described above.
- P.10. No provision for quarterly updates of telephone numbers.