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Federal Emergency Management Agency

Washington, D.C. 20472

JUL 11 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: Federal Emergency Management Agency (FEMA) Review of the
 Long Island Lighting Company (LILCO) Transition Plan for
 Shoreham In Support of the Nuclear Regulatory Commission
 (NRC) Licensing

This is in response to your memorandum of July 9, 1984, invoking the terms of the November 1980 NRC/FEMA Memorandum of Understanding and requesting that FEMA conduct a full Regional Assistance Committee (RAC) review of Revision IV of the LILCO Transition Plan. Revision IV responds to the FEMA finding transmitted to NRC on March 15, 1984.

FEMA intends to give the review of Revision IV of the Transition Plan the same priority treatment that has been accorded to previous reviews of the plan. However, we do not believe we can furnish the finding before November 15, 1984. Among the reasons for the required review time are other Shoreham-related obligations, set by NRC's Atomic Safety and Licensing Board (ASLB), which will place demands on the time of FEMA Region II staff (including the RAC Chairman) who would be involved in the review of Revision IV. FEMA witnesses are scheduled to testify on August 6, 1984 on contentions relating to public education and training. Before that date, extensive preparation must be done. Depositions may also occur on this material.

In addition to demands connected with Shoreham testimony, FEMA Region II has a substantial workload associated with operating nuclear reactors, notably Indian Point. Before the Fall 1984 exercise, the Rockland County Plan must be reviewed by the full RAC for the first time. Plan revisions for the other 3 counties must also be reviewed. Also, careful attention must be given to the review of the exercise scenario and objectives. This Indian Point exercise is especially important because (1) it is the first full-scale exercise since the ASLB issued its report in October 1983; (2) it is the first full-scale exercise since the June 1983 Commission ruling not to shut down the plant; and (3) it is the first full-scale exercise in which Rockland County will fully participate. It has already been delayed a few months to allow Rockland County to fully integrate itself into the planning and preparedness process. It cannot be delayed further. The same RAC members involved in this important effort are those who would have to work on the review of Revision IV of the LILCO Transition Plan.

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In October 1984, a full-scale exercise will take place at the Salem site. The RAC work for this exercise has just begun. In addition, RAC plan reviews are in progress for the Oyster Creek, Salem, and Ginna sites. These are critical to Region II submittals relating to plan approvals under 44 CFR 350.

Finally, the RAC members have other commitments within their own agencies and could not devote 100% of their time to Shoreham, even if they did not have these important duties associated with the operating nuclear reactors.

As you know, work on Region II sites has already been delayed in the past, due to the time-intensive demands stemming from both the Indian Point and Shoreham cases. Any further compression of the review timetable for the LILCO Plan, Revision IV, would cause additional delays which would seriously impact the public health and safety in the vicinity of the Region II operating nuclear reactors. We do not feel that a transfer of FEMA regional staff is a viable solution to this problem. Temporarily transferring staff from other FEMA Regions would only transfer the impact to other operating reactors. It would also be of little benefit unless the other RAC members could receive similar relief from their agencies. For these reasons, we believe that we cannot furnish a finding on Revision IV of the LILCO Transition Plan earlier than November 15, 1984.

If you have any questions, please feel free to contact me.