

November 14, 1995

Mr. Donald A. Reid  
Vice President, Operations  
Vermont Yankee Nuclear Power Corporation  
RD 5, Box 169  
Ferry Road  
Brattleboro, VT 05301

SUBJECT: FEDERAL EMERGENCY MANAGEMENT AGENCY (FEMA) POST-EXERCISE  
ASSESSMENT (PEA) FOR THE VERMONT YANKEE NUCLEAR POWER STATION  
RADIOLOGICAL EMERGENCY PREPAREDNESS EXERCISE

Dear Mr. Reid:

Enclosed are two letters from Mr. Louis A. Elisa, II, Regional Director for FEMA Region I. The September 25, 1995, letter notified the State of New Hampshire of a deficiency identified by FEMA during the September 13, 1995, exercise with the Vermont Yankee Nuclear Power Station. The October 2, 1995, letter officially notified the State of Vermont of two deficiencies identified by FEMA during the same exercise.

A deficiency for failing to complete the initial alert and notification sequence within 15 minutes of the decision to do so was assessed against both the State of New Hampshire and the State of Vermont. A second deficiency was assessed against the State of Vermont for several omissions which resulted in a finding that direction and control was deficient at the Vermont State Emergency Operations Center.

The NRC Region I office was informed by a telephone call from Mr. E. Porter of your staff that, on November 6, 1995, the State of Vermont successfully demonstrated to FEMA Region I, on October 25, 1995, corrective actions for the two deficiencies.

Please provide assistance to New Hampshire officials to address and resolve the identified items, as appropriate, if this has not already been done. The deficiency must be demonstrated to have been corrected by December 9, 1995.

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D. A. Reid

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If you have any questions concerning this enclosure, please contact us.

Sincerely,

(original signed by)

Richard R. Keimig, Chief  
Emergency Preparedness and  
Safeguards Branch  
Division of Reactor Safety

Docket No. 50-271  
Enclosure: As Stated

cc w/encl:

R. Wanczyk, Plant Manager

J. Thayer, Vice President, Yankee Atomic Electric Company

J. Duffy, Licensing Engineer, Vermont Yankee Nuclear Power Corporation

J. Gilroy, Director, Vermont Public Interest Research Group, Inc.

D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire

Chief, Safety Unit, Office of the Attorney General, Commonwealth of  
Massachusetts

R. Gad, Esquire

G. Bisbee, Esquire

R. Sedano, Vermont Department of Public Service

T. Rapone, Massachusetts Executive Office of Public Safety

State of New Hampshire, SLO Designee

State of Vermont, SLO Designee

Commonwealth of Massachusetts, SLO Designee

D. A. Reid

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- D. Tefft, Administrator, Bureau of Radiological Health, State of New Hampshire
- Chief, Safety Unit, Office of the Attorney General, Commonwealth of Massachusetts
- R. Gad, Esquire
- G. Bisbee, Esquire
- R. Sedano, Vermont Department of Public Service
- T. Rapone, Massachusetts Executive Office of Public Safety
- State of New Hampshire, SLO Designee
- State of Vermont, SLO Designee
- Commonwealth of Massachusetts, SLO Designee

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- D. Dorman, NRR
- P. McKee, NRR
- Inspection Program Branch, NRR (IPAS)
- R. Conte, DRP
- S. Baker, DRP
- NRC Resident Inspector

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OFFICE	RI/DRS	E	RI/DRS	/				
NAME	J. Lusher		R. Keimig					
DATE	11/14/95		11/14/95	11/ /95	11/ /95	11/ /95	11/ /95	

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# Federal Emergency Management Agency

Region I

J.W. McCormack Post Office and Courthouse Building  
Boston, Massachusetts 02109

September 25, 1995

Director George L. Iverson  
New Hampshire Office of Emergency  
Management  
State Office Park South  
107 Pleasant Street  
Concord, New Hampshire 03301

Dear Director Iverson:

This letter officially informs you of the Federal Emergency Management Agency's (FEMA) identification of a Deficiency which occurred during the Vermont Yankee Nuclear Power Station (NPS) Radiological Emergency Preparedness (REP) exercise conducted on September 13, 1995. This issue was discussed with your staff on September 14, 1995.

The Deficiency is being assessed against the New Hampshire State Emergency Operations Center (SEOC) under Objective 10: Alert and Notification. The Deficiency resulted from the SEOC's failure to complete the initial alert and notification sequence within fifteen minutes of the decision to do so. In accordance with FEMA-REP-14, page D.10-3, the identification of a Deficiency is required when a jurisdiction fails to complete the initial alert and notification sequence within 15 minutes after a decision to do so.


At 11:15 AM, September 13, 1995, the State of New Hampshire coordinated with the Commonwealth of Massachusetts and the State of Vermont for the initial activation of Vermont Yankee NPS's alert and notification system. All three states agreed to alert the general public through the sounding of fixed sirens, use of route alerting teams, and activation of National Weather Service tone alert radios at 11:25 AM. At 11:28 AM, the general public was to be notified of the emergency situation through the use of the emergency broadcast system.

The alert and notification sequence was not completed in New Hampshire because of the SEOC Operations Officer's failure to direct the SEOC Communications Officer to instruct Southwestern New Hampshire's District Fire Mutual Aid Dispatcher to activate the fixed sirens in New Hampshire's portion of the emergency planning zone. Activation of the alert and notification system is addressed in Volume 2 of the State of New Hampshire Radiological Emergency Response Plan, Revision 7A, page 5.0-5, paragraph 2.

In accordance with 44 CFR 350.9 (d) and FEMA-REP-14, we have reviewed and discussed this issue with FEMA Headquarters, the U.S. Nuclear Regulatory Commission, and FEMA Region I's Regional Assistance Committee members. FEMA-REP-14, page C.16-1, defines a Deficiency as "...an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is 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 a nuclear power plant. Because of the potential impact of a Deficiency on the public health and safety, it should be corrected within 120 days after the exercise through appropriate remedial actions, including remedial exercises, drills or other actions, including plan revisions." Therefore, correction of this Deficiency is required on or before December 9, 1995.

Please coordinate with this office the date and time of the pertinent remedial actions and identify the State, county and/or local participants within 10 days from the date of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Dan McElhinney, Chairperson, Regional Assistance Committee, at (617) 223 - 9567.

  
Louis A. Elisa, II  
Regional Director  
FEMA Region I





# Federal Emergency Management Agency

Region I

J.W. McCormack Post Office and Courthouse Building  
Boston, Massachusetts 02109

October 2, 1995

Director George L. Lowe  
Vermont Emergency Management Agency  
Department of Public Safety  
Waterbury State Complex  
107 South Main Street  
Waterbury, Vermont 05676-2101

Dear Director Lowe:

This letter officially informs you of the Federal Emergency Management Agency's (FEMA) identification of two deficiencies which occurred during the Vermont Yankee Nuclear Power Station (VYNS) Radiological Emergency Preparedness (REP) exercise conducted on September 13, 1995. These issues were discussed with you and your staff on September 14, 18, and 28, 1995.

The deficiencies are being assessed against the Vermont State Emergency Operations Center (SEOC) under Objective 3: Direction and Control, and Objective 10: Alert and Notification.

The first deficiency is the result of the following combination of omissions, best addressed as a whole rather than individually. The State failed to:

- Perform independent dose assessments and submit protective action recommendations based upon actual (simulated) field measurements from State Field Monitoring Teams; (Vermont Radiological Emergency Response Plan (VTRERP), page 11.6, chapter 11.3)
- Amend the content of emergency broadcast system (EBS) messages concerning the cancellation of the second session of kindergarten within the Windham Southwest Supervisory Union rather than Brattleboro schools only; (Vermont State Media Operation Procedures page 1 of Media Coordinator's Procedures, steps 4 and 5, and page 1 of EBS Writer's Procedure, Step 4 and 5)
- Change evacuation route instructions for the residents of Vernon; and (VTRERP, page 8.2, chapter 8.1.2)

REGION I  
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- Instruct the Burlington, Vermont Office of the National Weather Service to activate the tone alert radios for the fourth coordinated alert and notification sequence requested by New Hampshire and Massachusetts. (VTRERP Incident Director and EOC Manager's Guide, page Alert-7, step 33.c).

The potential consequences to public health and safety from these omissions constitute a Deficiency under Objective 3, in accordance with the provisions of FEMA-REP-14, page C.17-3, Task 17, paragraph 33.

The second Deficiency resulted from the SEOC's failure to complete the initial alert and notification sequence within 15 minutes of the decision to do so. In accordance with FEMA-REP-14, page D.10-3, the identification of a Deficiency is required when a jurisdiction fails to complete the initial alert and notification sequence within 15 minutes after the decision to do so.

The Vermont SEOC received notification of Site Area Emergency (SAE) at 1100. Upon deliberations in the SEOC it was decided to proceed with a declaration of a State of Emergency by the Governor and an initial EBS message. The Vermont SEOC initiated coordination with the States of New Hampshire and Massachusetts concerning the activation of fixed siren systems, the broadcast of the tone alert radio system, and the first EBS message. At 1115, agreement was reached with New Hampshire and Massachusetts to activate sirens and tone-alert radios at 1125 and to issue an EBS message at 1128. At 1120, the Public Notification Technician notified the National Weather Service, Burlington, Vermont to activate the tone alert radio at 1127. The SEOC Manager did not instruct EPZ towns (in accordance with the VTRERP Incident Director and EOC Manager's Guide, page Alert-8, step 33D) to activate their sirens until 1154.

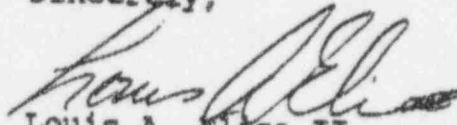
In accordance with 44 CFR 350.9 (d) and FEMA-REP-14, we have reviewed and discussed this issue with FEMA Headquarters, the U.S. Nuclear Regulatory Commission, and FEMA Region I's Regional Assistance Committee members. FEMA-REP-14, page C.16-1, defines a Deficiency as "...an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that oversight emergency preparedness is 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 a nuclear power plant. Because of the potential impact of a Deficiency on the public health and safety, it should be corrected

within 120 days after the exercise through appropriate remedial actions, including remedial exercises, drills or other actions including plan revisions." Therefore, correction of this Deficiency is required on or before January 11, 1996.

Please coordinate with this office the date and time of the pertinent remedial actions and identify the State, county and/or local participants within 10 days from the date of this letter.

Your cooperation in this matter is appreciated. If you have any questions, please contact Dan McElninney, Chairperson, Regional Assistance Committee, at (617) 223 - 9567.

Sincerely,



Louis A. Elisa II  
Regional Director