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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

Mr. James H. Reese, Chief  
Safeguards, Emergency Preparedness and  
Non Power Reactor Branch  
Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596

**SUBJECT: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
OUTSTANDING FEMA DEFICIENCIES**

- Reference:
1. Letter, GC Sorensen (Supply System) to JH Reese, (NRC Region V), same subject, dated September 18, 1991.
  2. Letter, K. Heimbach (WA. State DEM) to RW Donovan (FEMA, Region X), Open Exercise Items For Benton/Franklin Counties, dated November 7, 1991 (Attached).

In the Reference 1 letter the Supply System committed to provide you with an update of certain offsite radiological emergency preparedness (REP) exercise deficiencies previously identified by FEMA. Those specifically referred to were Washington State deficiencies S89-1, S90-5, S90-6, and S90-7; and Benton and Franklin County deficiency C89-3. The purpose of this letter is to provide that update.

Deficiency S89-1 against Washington State was evaluated and closed by FEMA during the September 24 and 25, 1991 Trojan Ingestion Pathway Exercise. The final report from that exercise, published by FEMA in December, 1991, indicated S90-5, S90-6 and S90-7, also against Washington State, are closed.

Deficiency C89-3 against Benton and Franklin Counties was evaluated by FEMA during the Hospital/Ambulance Medical Drills held on October 31, 1990. The FEMA Region X office confirmed the deficiency was closed when contacted on February 6, 1992.

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**OUTSTANDING FEMA DEFICIENCIES**  
March 12, 1992


With the closure by FEMA of the above deficiencies, there are presently none open. Therefore, unless any new deficiencies are identified, no periodic status reports will be submitted with respect to FEMA identified deficiencies.

In the Reference 1 letter, the Supply System also committed to provide an update on the combined efforts of the Supply System, Washington State and Benton and Franklin Counties to resolve all open Areas Requiring Corrective Action (ARCAs) previously identified by FEMA. Washington State has taken the lead in the resolution process and has petitioned FEMA to review the corrective actions taken for fifteen of the open County ARCAs (Reference 2).

The corrective actions for the remainder of the ARCAs currently open for Washington State will be demonstrated in the Supply System Exercise scheduled for December, 1992 or in future exercises scheduled for WNP-2 or the PGE Trojan Nuclear Power Plant.

We will provide you with an update of the open ARCAs identified in Reference 2, subsequent to the final FEMA reports being issued for the exercise discussed above.

Very truly yours,

  
G. C. Sorensen, Manager,  
Regulatory Programs (Mail Drop 280)

GCS/tj  
Attachment

cc: R. Donovan - FEMA, Region X  
Document Control Desk - NRC  
DL Williams - BPA (399)  
K. Heimbach - DCD/DEM  
AS Dixon - Franklin Co. DEM

JB Martin - NRC Region V  
PL Eng - NRC  
NRC Site Inspector (901A)  
J. Zeller - EFSEC/WSEO  
RC Martin - Benton Co. DEM

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C87-6	That a cold start be demonstrated during the next EWAC drill.	<p>A cold start was not demonstrated during the Connell EWAC drill (Aug. 1988), nor during the Isaac Stevens EWAC Drill (May 19, 1990).</p> <p>May 9, 1992, has been selected as the date for the Kiona-Benton EWAC Drill (See Attachment 1). A cold start will be one of the objectives of this drill.</p>
C88-2	That a dedicated fax be used for communication between the EOC and the JIC.	<p>During Jan. and Feb. of 1991, an analysis of "Fax Problems" was performed by Apollo Associated Services for the Supply System. As a result of that analysis, a number of recommendations have been made. Among them:</p> <ol style="list-style-type: none"> <li>1) Make certain administrative changes to improve the process.</li> <li>2) Test fax machines at JIC and County EOC locations.</li> <li>3) Purchase another fax machine for JIC. Designate one machine to receive and the other to send. This piece of capital equipment has not been funded for FY-92, so installation may be delayed.</li> </ol> <p>The Supply System expects to have actions 1 and 2 complete by November 30, 1991.</p>

## CORRECTIVE ACTION

ITEM

## FEMA RECOMMENDATION

C88-3 Revise procedures to contain more detailed implementing procedures for notification verification.

The emergency instructions in the 1991 calendar were revised to clarify that notification verification is not required, but would be performed when possible (See Attachment 2).

IP-6 will be revised to reflect the philosophy of performing notification/evacuation verification in the event that an evacuation order has been given (subject to the limitations discussed in IP-10, page 5, item 10). Otherwise it will be discretionary.

This information would be transmitted per IP-1 to the patrols via the Emergency Dispatch Center (See Attachment 2a).

IP-6 will be revised to identify the method of "route alerting" which is being worked on by both Benton and Franklin Counties.

We expect to have the above procedure revisions completed by Dec. 31, 1991.

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C88-6	That the EBS form be revised to include PAs for farm animals, and that staff be trained to issue consistent PARs.	<p>The counties have removed ingestion PARs from the FNF Emergency Broadcast Message Form (See Attachment 3).</p> <p>Washington State Executive Section will provide the counties ingestion PARs.</p>
C88-10	<ol style="list-style-type: none"> <li>1. Another registration form different from the one used by ARC should be used at the EWAC for voluntary evacuees.</li> <li>2. Maps with sufficient detail should be available at the EWAC.</li> <li>3. Consideration should be given to using a different label system.</li> </ol>	<ol style="list-style-type: none"> <li>1. The registration process has been changed to eliminate any need for a registration form different from the standard ARC Disaster Welfare Inquiry (DWI) Form. Evacuees are monitored as the first step after entering the EWAC. After they are found free of contamination, they are directed to the ARC Registration Desk to complete the DWI form. People who report to the EWAC, but who refuse to wait to be monitored will be offered an opportunity to complete the DWI form by the Monitor Assistants at the screening monitors station. This process is covered in the Job Description for the Monitor Assistant position (Attachment 3a). This process was demonstrated during the Stevens Jr. High Drill on May 19, 1990 and worked satisfactorily.</li> <li>2. Our current maps at the EWACs show all County roads, and are considered adequate to identify locations of interest at the EWAC. They do not show individual house locations; and we do not believe that level of detail is necessary.</li> <li>3. The WA DOH has supplied the Counties with new pressure sensitive labels which are issued to evacuees and emergency workers after they have been monitored or decontaminated and found clean. These labels were demonstrated during the Stevens Jr. High Drill On May 19, 1990, and were satisfactory.</li> </ol>

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C89-1	That the County follow procedures for distribution of (EBS) messages detailed in IP-8, Rev. 8, pg. 15.	<p>(The September 11, 1990, exercise comment regarding B/F PIOs did not receive fax copies of EBS messages until 1320 is not related to this ARCA. See Corrective Action for C88-2)</p> <p>The distribution of faxed EBS messages to other JIC organizations is the responsibility of the Supply System. This is addressed in PPM. 13.12.5, Attachment 4.3, Duties of JIC Distribution Team Supervisor/ Members (See Attachment 4).</p> <p>This will be demonstrated during the next FEMA evaluated exercise.</p>
C89-3	Design future drills to include an offsite incident involving a member of the general public in order to allow the counties to demonstrate medical transportation capability.	This capability was demonstrated October 31, 1990, by both Benton & Franklin Counties.
C90-1	Update the map (IP-6) and modify the section divider lines to make them distinct from roads identified on the map.	Revision of the IP-6 map has been completed in Revision 10, and will be updated in Revision 11 by December 31, 1991.

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-2	Revise IP-6 to indicate instructions for pilot to make first pass with sun at back and specify a flight altitude.	Procedure IP-6 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 5).
C90-3	Revise (County) procedures to include the procedures read over the ORV park staff.	Procedure IP-6 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 6).
C90-4	Develop text which can be read over the (ORV) park PA system.	Procedure IP-6 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 7).
C90-5	Revise plan and procedures to reference the ORV park and the CRV triangle surrounding the park separately.	Procedure IP-6 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 8).
C90-6	<ol style="list-style-type: none"> <li>1) Provide EW kits for ORV park workers.</li> <li>2) Train (ORV park) staff in use of dosimetry and KI.</li> <li>3) Revise procedures.</li> </ol>	<ol style="list-style-type: none"> <li>1) EW kits have been prepared and distributed. (July 9, 1991)</li> <li>2) Training is complete. (July 9, 1991,</li> <li>3) Procedure IP-6 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 9).</li> </ol>

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-7	Train staff (provide training for ARC Shelter Mgr.)	<p>According to Buddy Davis, Director of the local ARC Chapter, there are three designated shelter managers. All three have completed their training. A "Shelter Manager Training" course was successfully completed by the final candidate on Sept. 23 &amp; 24, 1991.</p> <p>This can be demonstrated May 9, 1992.</p>
C90-8	Develop a procedure checklist for runners and radio operators to facilitate internal and external communication at the EWAC.	<p>Procedure IP-12 has been revised to clarify the responsibility of the EWAC Coordinator to establish communication with other locations both within and outside the EWAC building (see attachment 10, IP-12, Rev. 10, Page 14, Item 5). IP-12 was also revised to include a checklist for the radio operators (See attachment 10, IP-12, Page 44). The coordinator for each EWAC is responsible for defining the means to be used; such as telephone extensions, hand held radios, or runners. For the Stevens EWAC, it was determined that hand held radios would be used to communicate with the parking lot at students and the ARC Shelter Managers Station (See Attachment 11), with runners serving the other locations. It was felt that the boy scouts serving as runners did not require an IP-12 checklist for their simple duties; and a job description sheet for their duties was provided for their job packet. (See Attachment 11).</p>



ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-11	Train staff on shift turnover process.	<p>Procedure IP-12 has been revised (Revision 10) to incorporate the FEMA recommendation.</p> <p>(See Attachment 15)</p> <p>Training will be completed by the May 9, 1992 EWAC drill.</p>
C90-12	Provide two-way briefings (i.e., County PA's versus utility recommendations) on a regular basis. Review and revise procedures if appropriate.	<p>This training is complete. (July 31 &amp; Aug. 7, 1991)</p> <p>No procedure revisions are necessary because this is adequately addressed in IP-4.</p> <p>Will be demonstrated during next evaluated drill.</p>
C90-13	Revise IP-14 to make it consistent with IP-19 (with respect to what actions to take if 5r dose is reached).	<p>Procedure IP-14 has been revised (Revision 10) to incorporate the FEMA recommendation.</p> <p>(See Attachment 16)</p>
C90-14	Revise IP-4 and IP-8, as well as any other applicable procedures, to indicate that a time will be specified for siren activation and EBS broadcast and that the responsible parties will ensure that the siren activation and EBS message are in effect at the specified times.	<p>Procedure IP-8 has been revised (Revision 10) to incorporate the FEMA recommendation.</p> <p>(See Attachment 17)</p> <p>The activation of the sirens and the EBS broadcast are independent activities, neither relying on the other.</p> <p>No additional procedure revisions are necessary.</p> <p>Will be demonstrated during next evaluated drill.</p>

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-9	<p>Revise EWAC Coordinator's Checklist and Parking Attendant's job description to specify responsibility for distributing these information sheets to the public as they arrive in the parking lot. Train Staff.</p>	<p>Procedure IP-12 has been revised (Revision 10) to incorporate the FEMA recommendations (See Attachment 12).</p> <p>Training will be demonstrated during the May 9, 1992 drill/exercise.</p>
C90-10	<p>Include a diagram of the EWAC exterior which shows entrance lanes, monitoring areas, parking areas and contaminated vehicle areas.</p> <p>Include a better diagram of the interior facility. Include location of registrar table.</p>	<p>Procedure IP-12 has been revised (Revision 10) to incorporate the FEMA (parking lot) recommendations (See Attachment 13).</p> <p>Procedure IP-12 has been revised (Revision 10) to incorporate the FEMA (interior) recommendations (See Attachment 14).</p>

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-15	That the following sentence be substituted for the current second sentence in Part 7 of the EBS text: "if you have family or employees who are out-of-doors and who do not have immediate access to shelter, direct them to evacuate the area".	Procedures IP-4 and IP-16 have been revised (Revision 10) to incorporate the FEMA recommendation.  (See Attachment 18)
C90-16	Prerecord EBS messages to eliminate preparation and reading errors. Revise procedures. Train staff.	The feasibility study determined that it was not practical to prerecord the EBS messages.  The Counties have located a local person who can assist them in developing a Spanish translation that is complete, accurate, and in the local colloquial dialect.  No procedure revisions or staff training is required.

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-17	Train Staff (PIO log maintenance at JIC).	<p>The staff PIO has received additional instruction concerning the proper procedure for maintaining a log of all the times news releases were issued. As other PIOs are trained, this topic will be included.</p> <p>All training has been completed.</p>
C90-18	Revise IP-5 (to include a specific step requiring the Transportation Coordinator to advise the bus drivers to take KI).	<p>Procedure IP-5 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 19).</p>
C90-19	Review and update the Special Needs Population data base annually as required by FEMA guidance.	<p>Procedure IP-5 has been revised (Revision 10) to incorporate the FEMA recommendation (See Attachment 20).</p>
C90-20	Preplan evacuation verification routes. Revise procedures. Train staff.	<p>The Counties are currently devising evacuation verification routes. We expect to have this completed by December 31, 1991.</p> <p>Any procedure revisions and/or staff training will be completed within 120 days of completion of the above item.</p> <p>(See also C88-3)</p>

ITEM	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-21	Review and revise ambulance procedures if appropriate.	<p>The procedure entitled "Ambulance Response to Emergency Worker Center or Other Medical Emergency Involving Radiological Conditions" has been revised to address health physics support (See Attachment 21).</p> <p>Monitoring and dose measuring techniques were successfully demonstrated during the Kadlec Hospital Drill on August 29, 1991.</p>
C90-22	Train (Kennewick General Hospital) staff (regarding monitoring processes).	<p>The KGH procedure(s) will be revised to reflect the current philosophy that health physics monitoring and dose measuring will be performed by outside organizations.</p> <p>The procedure changes are in place.</p> <p>Training is scheduled for December 3, 1991. Demonstration of the procedure changes will be during the FEMA Evaluated Drill scheduled for 1992.</p>

ITEM.	FEMA RECOMMENDATION	CORRECTIVE ACTION
C90-23	Review and revise procedures (for Mesa Ambulance Co. staff). Train staff.	<p>The procedure entitled "Ambulance Response To Emergency Worker Center or Other Medical Emergency Involving Radiological Conditions" has been revised to address health physics support.</p> <p>(See Attachment 21)</p> <p>Monitoring and dose measuring techniques will be able to be demonstrated during the evaluated drill currently scheduled for 1992.</p>
C90-24	Train (Our Lady of Lourdes Hospital) staff on performance of initial contamination surveys. Review and revise training program to provide hands on training with appropriate survey instruments.	<p>The Our Lady of Lourdes Hospital procedure(s) will be revised to reflect the current philosophy that health physics monitoring and dose measuring will be performed by outside organizations.</p> <p>The procedure changes are in place.</p> <p>Training is scheduled for December 6, 1991. Demonstration of the procedure changes will be during the FEMA Evaluated Drill scheduled for 1992.</p>

CHUCK CLARKE  
Director



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STATE OF WASHINGTON  
DEPARTMENT OF COMMUNITY DEVELOPMENT  
EMERGENCY MANAGEMENT DIVISION

4220 E. Martin Way, PT-11 • Olympia, Washington 98504-8611 • (206) 459-9191 • (SCAN) 585-9191

November 7, 1991

Mr. Richard Donovan,  
RAC Chairman  
Federal Emergency Management Agency  
Region X  
Federal Regional Center  
130 228th St. SW  
Bothell, WA 98021-9796

**SUBJECT: OPEN EXERCISE ITEMS FOR WNP-2  
BENTON AND FRANKLIN COUNTY**

Reference: Letter, R. Carino (Benton County) to R. Donovan  
(FEMA), Same Subject dated June 6, 1991

A meeting was held on May 30, 1991, among representatives from the Supply System, the State of Washington Emergency Management Division (EMD), Department of Health, Benton and Franklin Counties, and certain other Ingestion Zone Counties to discuss outstanding issues of common concern related to Emergency Planning. It was mutually agreed at that meeting that a concerted effort by all parties would be put forth to close out as many of the FEMA open items as possible. It was further mutually agreed that a single point of contact for corresponding with FEMA concerning open items for WNP-2 should be identified. The most appropriate point of contact for that purpose was determined to be the Washington State Department of Community Development, Emergency Management Division. Therefore, we request that all future correspondence regarding open items for WNP-2 be directed to me, with copies to the appropriate counties, state agencies and the Supply System.

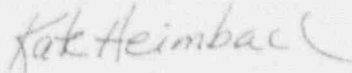
The purpose of this letter is to expand on the Benton and Franklin County response provided to you in the reference letter. Each item is addressed in further detail below. The open items for WNP-2 and Washington State will be addressed in the near future. We plan to have that letter to you by December 31, 1991.

Mr. Richard Donovan  
November 7, 1991

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Should you have any questions regarding the enclosed corrective actions, please feel free to contact me or Diane Offord directly, so that we may address your concerns in an expeditious manner.

Sincerely,



Kate Heimbach  
Assistant Director

KH:DO:gr

Enclosure