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W3F1-95-0213

A4.05

PR

January 15, 1996

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, D.C. 20555

Subject: Waterford 3 SES
Docket No. 50-382
License No. NPF-38
FEMA Identified Deficiencies At The July 12, 1995
Radiological Emergency Preparedness Exercise

Gentlemen:

During the July 12, 1995 Joint Exercise of Offsite Radiological Emergency Response Plans for the Waterford 3 Steam Electric Station, Two Deficiencies were identified by the Federal Emergency Management Agency (FEMA) for both St. Charles and St. John the Baptist Parishes. The Deficiencies were cited against FEMA exercise objectives 10 (Alert and Notification) and 11 (Public Instructions and Emergency Information).

In letters dated August 29, 1995 and November 7, 1995, the NRC requested that Waterford 3 follow-up with offsite officials on these Deficiencies and keep the NRC informed of the status of the resolution of these issues. The following status is provided for your information.

On November 8, 1995, a Remedial Drill was held at Waterford 3 to resolve these Deficiencies. All participants adequately demonstrated the assigned objectives and the outstanding Deficiencies were resolved at both St. Charles and St. John the Baptist Parishes. These results are documented in the Federal Emergency Management Agency Remedial Drill Report for Waterford 3 Steam Electric Station dated November 30, 1995.

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FEMA Identified Deficiencies

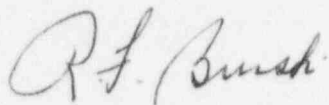
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If you have any questions on the above, please contact F.J. Englebracht,
Emergency Planning and Administration Manager, at (504) 739-6607.

Very truly yours,



R.F. Burski
Director
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RFB/DMU/tjs
Attachments

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Remedial Drill Report

Waterford 3 Steam Electric Station

Licensee: Entergy Operations, Inc.

Remedial Drill Date: November 8, 1995

Report Date: November 30, 1995

FEDERAL EMERGENCY MANAGEMENT AGENCY

Region VI

800 N. Loop 288

Denton, TX 76201

9601160359 11 pp.

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I. EXECUTIVE SUMMARY

On November 8, 1995, a Remedial Drill was held at Waterford 3 Steam Electric Station. The drill was conducted to clear Deficiencies which were identified during the Waterford 3 biennial Radiological Emergency Preparedness (REP) Exercise of July 12, 1995. Deficiencies were noted during that exercise at St. Charles Parish (Issue Nos. 70-95-10-D-01 and 70-95-11-D-02) and St. John the Baptist Parish (Issue Nos. 70-95-10-D-03 and 70-95-11-D-04) relating to the alert and notification objectives (10 and 11).

Principal participants were the Parish EOCs in both St. Charles and St. John the Baptist Parishes. Other organizations who participated in support of the two parishes were the Louisiana Radiation Protection Division (LRPD), the Waterford 3 Emergency News Center, Rumor Control Center, Waterford 3 Emergency Operations Facility, WWL radio in New Orleans and WADU radio in LaPlace.

FEMA Exercise Objective 10 is concerned with the ability of the Off-site Response Organization (ORO) to alert the public within 15 minutes following a decision by the local authorities that some protective action recommendation should be made known to the public. Exercise Objective 11 deals with the specific action to be taken (shelter-in-place or evacuate) and other instructions relating to geographical boundaries of the affected area, what to take if evacuating, where to go and the route to take, as well as other pertinent information.

All participants adequately demonstrated the assigned objectives. The outstanding Deficiencies were cleared at both St. Charles Parish and St. John the Baptist Parish.

Time sensitive actions are presented in Table 1 on the following page. All times indicated in the table are within the prescribed time frames as delineated in FEMA REP-14.

Table 1. Exercise Timeline

DATE AND SITE: November 8, 1995, Waterford 3

Emergency Classification Level or Event	Time Utility Declared	Time That Notification Was Received or Action Was Taken	
		St. Charles Parish EOC	St. John the Baptist EOC
Unusual Event	N/A	NA	NA
Alert	9:50a	10:01a	10:02a
Site Area Emergency	10:10	10:14	10:17
General Emergency	10:25	10:30	10:32
Rad. Release Started	10:10	10:30	10:32
Radiation Release Terminated	NA	NA	NA
Exercise Terminated		11:00a	11:00a
Protective Action Decision <u>St. Charles</u> <u>St. John</u> Evacuate: A1, B1, B2 A2 C1 & D1 Shelter: All other All other Sections Sections		10:42	10:48
Siren Activation		10:50	10:50
EBS Message *		10:51	10:51

* Completion of all required activities as per REP-14, Obj. 10

II. EXERCISE EVALUATION AND RESULTS

1. St. Charles Parish EOC

- a. Exercise Objectives: 10 and 11
- b. Deficiency Description and Recommendation

Issue No. 70-95-10-D-01

Description: St. Charles Parish EOC personnel did not meet the requirement to complete the alert and notification of the public sequence in 15-minutes as described in FEMA REP-14 on page D.10-2. See narrative in the Waterford 3 final exercise report dated September 28, 1995 for details (pages 31 and 32). See also Appendix 6 of same report, EBS Station Observations. (NUREG-0654, II, E.5.,6.,7)

Recommendation: Modify, where necessary, the Waterford-3 Alert/Notification system to ensure that all appropriate actions can be accomplished within the specified time. When these modifications have been accomplished, redemonstrate this objective to verify the adequacy of the corrections.

The Parish EOC may want to consider changing the backup assignment list so that critical functional positions, such as the PIO, are not required to serve as a backup to other positions. The problem also could be corrected by not making dual assignments and delegating critical positions to the 2nd backup, thus keeping the PIO free to concentrate only on the emergency public information function. Another possible correction of the timing problem could be the development and usage of a single EBS message for combined (evacuation and sheltering) EBS messages.

The capability to meet this objective must be redemonstrated during a remedial drill.

Issue No. 70-95-11-D-02

Description: St. Charles Parish authorities did not provide the EBS stations with complete messages that included a full description of the affected geographical areas when they faxed the broadcast message to the stations nor did the station have the complete message text at the station without extracting information from different parts of a ring binder. (NUREG-0654, E.)

Local authorities have no way of verifying the correctness of the message being broadcast when the responsibility for the insertion of geographical boundaries is deferred to the station operator.

The St. Charles Parish PIO did not inform the Rumor Control Center of PADs that were made. EBS messages were also not provided to the Rumor Control Center.

Recommendation: Public information staff should receive additional training regarding the importance of including all affected areas in EBS messages. All prescribed EBS messages should be reviewed and, as necessary, revised to ensure that they contain all information (including geographical and familiar landmark information to delineate the affected area) necessary to effectively inform the public during an emergency at Waterford 3.

The message should be complete prior to being faxed to the EBS station so that the station personnel are not made responsible for extracting information to complete the message.

The St. Charles Parish PIO should ensure that all PAD and other pertinent information, including EBS messages, is given to the Rumor Control Center.

The capability to meet this objective must be redemonstrated during a remedial drill.

c. Remedial Action Demonstrated

The remedial drill began in St. Charles Parish at 10:01 a.m. with the hotline receipt of Message F-1 which declared an ALERT at Waterford 3 at 9:50 a.m. No protective action recommendations (PARs) were made and no release was occurring at that time. Beginning at 10:10 a.m. the EOC staff was notified. In accordance with the Extent-of-Play Agreement, players for this drill included an Acting Parish President, an Acting Emergency Preparedness Director, an Emergency Preparedness Coordinator, a Communicator, a Parish Public Information Officer (PIO), an Assistant PIO, a Public Information Coordinator from Louisiana Power and Light (LP&L), and an Entergy Technical Advisor. Between 10:10 and 10:14 a.m. the 911 Center, fire department alert teams and Air Logistics (helicopter for remote area and backup notification) were notified of the ALERT at Waterford 3. A communications check and coordination of procedures were also made with St. John the Baptist Parish.

At 10:14 a.m. the **SITE AREA EMERGENCY (SAE)** message, F-2, was received. The SAE was declared at 10:10 a.m. when a release occurred. There was no PAR at this time. The EOC staff reviewed the EOC and siren activation procedures. The PIO reviewed procedures and EBS message options and placed radio station WWL on standby.

At 10:30 a.m. message F-3 was received which upgraded the ECL to a **GENERAL EMERGENCY (GE)**. The GE was declared at 10:25 a.m. and included a continued release and a PAR to evacuate Protective Action Sections (PASS) A1, B1, C1, D1, A2, B2, and shelter all remaining protective action sections (B3, B4, C2, D2, D3 and, D4 in St. Charles Parish). Section A2 is covered by St. John the Baptist Parish. At 10:42 a.m. the PAR was concurred with and an Evacuation Order was signed by the Acting Parish President. Coordination for siren activation at 10:50 a.m. was made with St. John the Baptist Parish and EBS station WWL. WWL was placed on standby for a live broadcast of the EBS message from the EOC immediately following siren activation. Notification of the State EOC regarding the protective action decision was simulated.

The EBS message was faxed, beginning at 10:50 a.m. to the St. John the Baptist Parish EOC, EBS station WWL and the Emergency News Center (ENC). The LP&L PIO had contacted and read this message to the ENC beginning at 10:49 a.m. The EBS message broadcast was completed at 10:53 a.m. This message had been recorded for repeat broadcasts every 15 minutes during the first hour and every 30 minutes thereafter unless changed or cancelled. Receipt of the EBS message were confirmed at 10:55 a.m. for St. John the Baptist Parish and WWL and 11:09 a.m. for the ENC. The initial alert and notification sequence for this drill was completed in 9 minutes.

Evaluators at radio stations WADU and WWL, the ENC and the Rumor Control Center (RCC) corroborated the receipt of notification times and the transmittal of faxed EBS messages (protective action decisions) from St. Charles Parish. The ENC kept the RCC updated in a timely manner on information received from St. Charles Parish.

The exercise was terminated at 11:00 a.m. following the simulated broadcast of the EBS message to the public and confirmation that all participating organizations had received the proper information.

Deficiencies 70-95-10-D-01 and 70-95-11-D-02 are considered to be resolved as a result of an adequate redemonstration of objectives 10 and 11 by all participating organizations.

2. St. John the Baptist Parish EOC

- a. Exercise Objectives: 10 and 11
- b. Deficiency Description and Recommendation

Issue No. 70-95-10-D-03

Description: St. John the Baptist Parish failed to meet the required 15-minute time limit between the decision to advise the public of the initial protective action and the completion of all actions specified under Objective 10 in FEMA REP-14. See the Waterford3 final exercise report dated September 28, 1995 for more detail (pages 40 and 41). (NUREG-0654, II, E.5.,6.,7)

Recommendation: Modify, where necessary, the Waterford-3 Alert/Notification system to ensure that all appropriate actions can be accomplished within the specified time. When these modifications have been accomplished, redemonstrate this objective to verify the adequacy of the corrections.

The capability to meet this objective must be redemonstrated at a remedial drill.

Issue No. 70-95-11-D-04

Description: St. John the Baptist Parish authorities did not provide the EBS stations with complete messages that included a full description of the affected geographical areas when they faxed the broadcast message to the stations nor did the station have the complete message text at the station without extracting information from different parts of a ring binder. (NUREG-0654, E.)

Local authorities have no way of verifying the correctness of the message being broadcast when the responsibility for the insertion of geographical boundaries is deferred to the station operator.

The St. John the Baptist Parish PIO did not inform the Rumor Control Center of PADS that were made and other pertinent information, including EBS messages.

Recommendation: Public information staff should receive additional training regarding the importance of including all affected areas in EBS messages. All prescribed EBS messages should be reviewed and, as necessary, revised to ensure that they contain all

information (including geographical and familiar landmark information to delineate the affected area) necessary to effectively inform the public during an emergency at Waterford 3.

The message should be complete prior to being faxed to the EBS station so that the station personnel are not made responsible for extracting information to complete the message.

The St. John the Baptist Parish PIO should ensure that all PAD and other pertinent information, including EBS messages are given to the Rumor Control Center.

c. Remedial Action Demonstrated

The St. John the Baptist Parish Emergency Operations Center (EOC) was minimally staffed, as per agreement, to redemonstrate FEMA exercise objectives 10 and 11. These objectives relate to the alert and notification of the public in the event of a potential or actual radiological release to the atmosphere from a nuclear power plant that could detrimentally affect the health and safety of the public. Staffing included two Assistant Directors, a Parish President representative, a PIO, an Administrative Officer, an Administrative support staff member, a Louisiana Power & Light (LP&L) Liaison and an Entergy Operations Liaison for technical support.

The Remedial drill began at 10:02 a.m. with a notification of **ALERT** from Waterford 3 that was declared at 9:50 a.m. The St. John the Baptist Parish PIO immediately called radio station WADU, the primary station for St. John the Baptist Parish, and asked them to be on standby in the event the situation escalated to the point that the public should be warned. Radio station WWL in New Orleans, the backup station, was also notified to be ready in the event station WADU in LaPlace had problems. The EOC staff then began discussing the possible effects of the event if it escalated and what their most probable actions would be to protect the health and safety of the public.

The notification of **SITE AREA EMERGENCY** was received at 10:17 a.m. There were no protective action recommendations (PARs) made at this time by either the State or utility. The EOC staff simulated actions required by their procedures to notify other staff, agencies and organizations and to request transportation support in the event of an evacuation.

At 10:32 a.m. the EOC staff received notification that a **GENERAL EMERGENCY** had been declared at 10:25 a.m. The notification was accompanied by a PAR to evacuate Protective Action Sections A1, B1, C1, D1, A2 and B2. All other Sections were advised to shelter-in-place. The staff fully discussed the possible effects of evacuation and whether it should be a phased evacuation or full evacuation. Since there was a radiological release in progress, the decision was not to recommend a phased evacuation, but to initiate an immediate and complete evacuation.

A decision was reached at 10:48 a.m. to accept the PAR without modification. This decision was made after consulting with St. Charles Parish. Both parishes agreed to sound the sirens at 10:50 a.m. so that citizens in both parishes would be alerted at the same time to avoid any confusion. The PIO was already on the telephone with radio station WA 7 to read the evacuation and shelter message to the public via a direct hookup with the radio station. The message was recorded (simulated) by the station operator for later repeat broadcast. Notification of the State EOC regarding the protective action decision was simulated.

Evaluators at radio stations WADU and WWL, the ENC and RCC corroborated the receipt of notification times and the transmittal of faxed EBS messages (protective action decisions) from St. John the Baptist Parish. The ENC kept the RCC updated in a timely manner on information received from St. John the Baptist Parish.

The exercise was terminated at 11:00 a.m. following the simulated broadcast of the EBS message to the public and confirmation that all participating organizations had received the proper information.

Deficiencies 70-95-10-D-03 and 70-95-11-D-04 are considered to be resolved as a result of an adequate redemonstration of objectives 10 and 11 by all participating organizations.