



# Federal Emergency Management Agency

Washington, D.C. 20472

NOV 15 1984

Mr. William J. Dircks  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Dircks:

On July 9, 1984, the Nuclear Regulatory Commission (NRC) requested the Federal Emergency Management Agency (FEMA) to conduct a full Regional Assistance Committee (RAC) review of Revision 4 of the Long Island Lighting Company's (LILCO) Transition Plan for the Shoreham Nuclear Power Station (SNPS) and to provide the NRC with its findings. This request was made in accordance with the NRC/FEMA Memorandum of Understanding (MOU) dated November 1980. Revision 4 was submitted to the NRC by LILCO on June 29, 1984, in response to FEMA Region II's Consolidated RAC Review of Revision 3 dated February 10, 1984. FEMA's findings on Revision 3 were provided to the NRC on March 15, 1984.

A full RAC review of Revision 4 has been completed and the results are contained in the enclosed report entitled "LILCO Transition Plan for Shoreham - Revision 4, Consolidated RAC Review." The RAC reviewed the Plan against the standards and evaluative criteria of NUREG-0654/FEMA-REP-1, Rev. 1. Due to the legal authority issues which arise when some NUREG elements are applied to a utility-based plan, we have marked with an asterisk any aspect of the plan where, in our view, this legal issue occurs. The specific legal concern related to that part of the plan is identified separately in Attachment 2 of the consolidated RAC review. Such legal concerns affect 24 NUREG elements. With the exception of plan aspects relating to NUREG element A.2.b. (a requirement to state, by reference to specific acts, statutes, or codes, the legal basis for the authority to carry out the responsibilities listed in A.2.a., i.e., all major response functions), the legal concern did not affect the FEMA rating given to the technical or operational items relating to NUREG elements.

FEMA finds that Revision 4 is a substantial improvement over Revision 3. Of the 32 inadequacies identified in the RAC's review of Revision 3, only 8 elements remain inadequate. The deficiencies and recommendations for improvement are explained in the RAC report. The NUREG evaluation criteria for the remaining 8 elements are as follows. (An asterisk indicates there is also a concern pertaining to legal authority which surfaced in the RAC review. In some of the inadequacies, the legal issues are the major concerns.)

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- (1) A.2.b.\* Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities (i.e., the authorities mentioned in NUREG-0654 element A.2.a.).
- (2) A.3.\* Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information.
- (3) C.4.\* Each organization shall identify nuclear and other facilities, organizations, or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.
- (4) I.7. Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone (EPZ) which are an intrinsic part of the concept of operations for the facility.
- (5) I.9. Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as  $10^{-7}$  uCi/cc (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.
- (6) I.10. Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.
- (7) J.9. Each State and local organization shall establish a capability for implementing protective measures based upon protective action guides and other criteria. This shall be consistent with the recommendations of the Environmental Protection Agency (EPA) regarding exposure resulting from passage of radioactive airborne plumes and with those of the Department of Health and Human Services/ Food and Drug Administration (HHS/FDA) regarding radioactive contamination of human food and animal feeds.

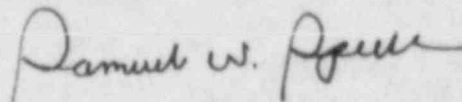
- (8) J. .k.\* The organization's plans to implement protective measures ~~in~~ the plume exposure pathway shall include: Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to the use of evacuation routes, and contingency measures.

I have also enclosed a copy of a letter (dated October 17, 1984) from the Federal Communications Commission (FCC) to FEMA Region II RAC Chairman Roger B. Kowieski clarifying a RAC concern, in connection with the review of NUREG-0654 element E.5, as to whether private organizations have the authority to activate the Emergency Broadcast System (EBS). According to the FCC letter, "...the EBS may be activated at the State and local level by AM, FM and TV broadcast stations, at management's discretion, in connection with day-to-day emergency situations posing a threat to the safety of life and property." (See Attachment 1, Consolidated RAC Review, page 16, for review comments concerning the EBS to be utilized by LILCO.) This information was not available until after the submittal of the RAC finding to FEMA Headquarters.

Finally, additional information has come to our attention since the RAC report was submitted concerning the relocation centers. The enclosed LILCO letter dated September 25, 1984, from John D. Leonard, Jr. to Harold R. Denton, NRC provides details pertaining to how LILCO proposes to modify Revision 4 regarding these centers. However, there are three facilities identified on the list of 53 which are State facilities and, therefore, it is not certain whether they will be available for use as relocation centers. They are: Nassau County Board of Cooperative Educational Services, Westbury; State University of New York (SUNY), Old Westbury; and, SUNY, Farmingdale.

I hope the enclosed finding is helpful in your analysis of emergency preparedness issues concerning Shoreham. If you have any questions, please don't hesitate to call me.

Sincerely,



Samuel W. Speck  
Associate Director  
State and Local Programs  
and Support

Enclosures