

243
RELATED CORRESPONDENCE



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

DOCKETED
USNRC

November 20, 1984

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James A. Laurenson, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dr. Jerry R. Kline
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Mr. Frederick J. Shon
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
LONG ISLAND LIGHTING COMPANY
(Shoreham Nuclear Power Station, Unit 1)
Docket No. 50-322-OL-3 (Emergency Planning)

Dear Administrative Judges:

Enclosed for your information is a copy of a letter from the Federal Emergency Management Agency (Samuel W. Speck) to the NRC (William J. Dircks) dated November 15, 1984. Attached to the letter is the FEMA report on the RAC review of Revision 4 to the the LILCO Transition Plan.

Sincerely,

Bernard M. Bordenick

Bernard M. Bordenick
Counsel for NRC Staff

Enclosure:
As stated

cc: See page 2

DS07

cc: Jonathan D. Feinberg, Esq.
Howard L. Blau, Esq.
Cherif Sedkey, Esq.
Herbert H. Brown, Esq.
Atomic Safety and Licensing
Board Panel
Karla Letsche, Esq.
Edward M. Barrett, Esq.
Marc W. Goldsmith
Fabian G. Palomino, Esq.
Hon. Peter Cohalan
John F. Shea, III, Esq.
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Gerald C. Crotty, Esq.

Norman L. Greene, Esq.
W. Taylor Reveley III, Esq.
Stephen B. Latham, Esq.
Eleanor L. Frucci, Esq.
Atomic Safety and Licensing
Appeal Board Panel
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Mr. Brian McCaffrey
Martin Bradley Ashare, Esq.
MHB Technical Associates
Mr. Jay Dunkleberger
Docketing and Service Section
Spence Perry, Esq.
Leon Friedman, Esq.
Ben Wiles, Esq.
Chris Nolin



Federal Emergency Management Agency

Washington, D.C. 20472

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OFFICE OF SEARCHING
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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.)

- (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.

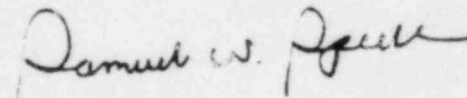
- (8) J.D.K.* The organization's plans to implement protective measures for the plume exposure pathway shall include: Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to the use of evacuation routes, and contingency measures.

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

LILCO Transition Plan for Shoreham - Revision 4
Key to Consolidated RAC Review
 Dated October 12, 1984

RELATED CORRESPONDENCE

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The Regional Assistance Committee (RAC) review of the LILCO Transition Plan for Shoreham (Attachment 1) is based upon planning criteria specified in NUREG-0654, FEMA-REP-1, Rev. 1; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November, 1980. The plan has been evaluated against each planning element specified in NUREG-0654 applicable to State and/or Local jurisdictions. These evaluations are keyed to the following rating system:

ADEQUATE RATING

A (Adequate)

A* (Adequate - concerns pertaining to LERO's legal authority identified during this review)

The element is adequately addressed in the plan. Recommendations for improvement shown in **bold type** are not mandatory, but their consideration would further improve the LERO plan. These recommendations include revisions to the NUREG-0654 cross-reference, and other minor improvements.

The element is adequately addressed in the plan provided concerns pertaining to LERO's legal authority are resolved. The issues of legal authority affecting these elements are more fully described in Attachment 2.

Recommendations for improvement (not related to legal concerns) shown in **bold type** are not mandatory, but their consideration would further improve the LERO plan. These recommendations include revisions to the NUREG-0654 cross-reference, and other minor improvements.

INADEQUATE RATING

I (Inadequate)

I* (Inadequate - concerns pertaining to LERO's legal authority identified during this review)

The element is inadequately addressed in the plan for the reason(s) stated in **bold type**. The plan and/or procedures must be revised before the element can be considered adequate.

The element is inadequately addressed in the plan for the reason(s) (not related to legal concerns) stated in **bold type**. The plan and/or procedures must be revised before the element can be considered adequate.

In addition, concerns pertaining to LERO's legal authority were identified by the RAC, and are more fully described in Attachment 2.

LILCO Transition: Plan for Shoreham - Revision 4
Consolidated RAC Review
 Dated October 12, 1984

DOCKETED
USNRC

Page 1 of 59

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Rating

NUREG-0654
Element

Review Comment(s)

A.

Assignment of Responsibility
(Organization Control)

A.1.a

The lead role for response activities belongs to the utility, LILCO. The plan establishes the Local Emergency Response Organization (LERO) developed by the utility and comprised of federal, utility and private organizations.

A*

Suffolk County is not participating in offsite emergency planning for Shoreham (see Chapter 1, Section 1.1, page 1.1-1 of the plan which references Resolution 1196-83, adopted February 17, 1983 by Suffolk County Legislature), and New York State has not implemented actions (see Chapter 1, Section 1.4, page 1.4-1. of the plan) relative to their authority.

Should New York State decide to respond in the event of a radiological emergency at Shoreham, the types of services that the State might provide are defined as follows (see page 1.4-2a):

- Command and Control
- Communications
- Evacuation
- Social Services
- Public Health
- Fire and Rescue

Should Suffolk County decide to respond in the event of a radiological emergency at Shoreham, the plan provides that the Director of Local Response will work in conjunction with the County Executive or his representative in responding to the emergency (See page 3.1-1). This would include the active participation at the EOC of the County

*See footnote at the end of comments for element A.1.a which are continued to page 3.

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LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 2 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.1.a
(Cont'd)

Executive the participation of Public Information personnel at both the EOC and the ENC; and the participation of other County officials to the extent the County Executive deems prudent (See page 1.4-2a). LILCO expects that Suffolk County personnel will continue to perform their normal functions in accordance with referenced sections of The Suffolk County Charter for the following (see page 1.4-b):

- Snow removal
- Fire Safety
- Police Actions

According to the plan, provision for New York State to interface with the LERO decision process is accommodated by LERO's transmission of emergency information via the State's Radiological Emergency Communications System (RECS). The plan should be revised to reflect the current situation. The RECS line to New York State has been deactivated (see letter from David Axelrod, Chairman, New York State Disaster Preparedness Commission to Charles Daverio, LILCO; dated July 10, 1984), while the plan (see page 1.4-2, line 29) shows this line to be available. Commercial telephone serves as a means of communication if the State decides to participate.

The response roles of Federal agencies identified in Figure 2.2.1 are detailed for the following agencies in Section 2.2 of the plan (see pages 2.2-2a -- 2.2-4f). The response roles of the following agencies are addressed:

- U.S. Coast Guard
- FEMA
- NRC
- DOE
- USDA
- DOC
- DOD
- HHS

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 3 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.1.a
(Cont'd)

- DOT
- EPA
- NCS

The plan specifically states that it is expected that NRC will assign a liaison to the EOC (see page 2.2-1, lines 44-46). Figure 4.1.3 indicates that two centrex/commercial telephone lines and instruments are available at a desk in the operations area of EOC assigned to the NRC liaison.

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

A.1.b

The operational role of LERO is defined in Sections 1.4, 2.1 and 3 of the plan.

A

Definition of the concept of operations has been improved in Revision 4 of the plan. Response roles of the various Federal agencies which may be called upon to support the LERO response have been clarified. Figure 2.2.1 has been revised to show response organization relationships. Agency roles are described more fully (i.e., EPA - page 2.2-4f, USDA - page 2.2-4c).

Pages 2.2-4 and 2.2-4a accurately describe FEMA's role as the primary point of contact and coordination between the NRC and other Federal agencies for nontechnical response activities.

LILCO anticipates that all local law enforcement agencies, fire departments, and snow removal agencies within the 10-mile EPZ will continue to carry out their normal response functions during a radiological emergency at SNPS (see pages 1.4-2b

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 4 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.1.b
(Cont'd)

and 2.2-4g). Revision 4 of the plan clearly states that LILCO has not obtained agreements with Local Law Enforcement Agencies, Fire Departments and Snow Removal Agencies (see Page 2.2-4g, line 47). Revision 4 of the LILCO Transition Plan specifies the following provisions that would allow police and fire departments to perform their normal functions in the event of radiological emergency at SNPS.

- LERO will offer training in dosimetry and radiation fundamentals and equipment (see Procedure OPI# 5.1.1, Section 5.1.3.4) to these agencies.
- LERO will provide adequate supplies of dosimetry equipment to these agencies.
- If no training is provided prior to an actual emergency, LERO will designate personnel trained in radiation protection and equipped with dosimetry to accompany county personnel carrying out their duties within residential areas.

LERO does not intend to use Law Enforcement and Fire Departments where exposures in excess of the general public PAGs are possible.

A.1.c

The organizational components of LERO are illustrated in Figure 2.2.1.

A

The position of Radiation Health Coordinator is filled by an outside consultant (see page 2.2-4g) from IMPELL Corporation, who provides LERO with health physics expertise.

Figure 2.2.1 has been revised to depict Federal support response agencies, and corresponds with the description of roles described in Section 2.2 of the plan (see also comment for element A.1.a).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 5 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.1.c
(Cont'd)

Commercial telephone serves as a means of communication if the State decides to participate.

Figure 3.4.1 indicates that both New York State and Suffolk County have RECS communication lines. The assumption that New York State and Suffolk County would pick up these dedicated lines and receive notification in the event of a radiological emergency is incorrect. The plan should be revised to reflect the current situation. The RECS line to New York has been deactivated (see letter from David Axelrod, Chairman, New York State Disaster Preparedness Commission to Charles Daverio, LILCO; dated July 10, 1984), while the plan (see page 1.4-2, line 29) shows this line to be available.

A.1.d

Specific individuals who shall be in charge of the emergency response are identified by title under Chapter 2, organization (pages 2.1-1 - 2.1-8). Again, LILCO personnel are the majority of LERO staff, along with DOE-RAP personnel from the Brookhaven Area Office (BHO).

A*

The position of Radiation Health Coordinator is filled by a consultant provided by IMPELL Corporation. The NUREG-0654 cross-reference has been revised to refer to Appendix B, page APP-B-70 which is a LILCO purchase order to cover the costs associated with the consulting services of a Radiological Health Coordinator from IMPELL Corporation. According to this purchase order, one of either a primary or alternates is required to respond in the event of an accident at SNPS.

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 6 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.1.d
(Cont'd)

The NUREG-0654 cross-reference has also been revised to refer to Appendix B, page APP-B-71 which is a proposal from IMPELL Corporation to LILCO to provide personnel to fill the position of Nuclear Engineer which has been added to the LERO organization in Revision 4 of the LILCO Transition Plan. One (1) primary and four (4) alternates are proposed to fill this position.

A.1.e

The lead Communicator (see page 2.1-7) has responsibility for ensuring that all communicator positions in the local EOC are manned on a continuous basis once this facility is activated. Also, Chapter 3, Section 3.4, pages 3.4-1 - 3.4-5 stipulates that the Radiological Emergency Communications (RECS) line between the Plant and LERO, and LILCO's Notification Radio System are monitored 24-hours per day.

A

A.2.a

The functions and responsibilities for major elements and key individuals by title, of emergency response, are specified in the plan for the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement and Transportation. Section 2.1 (see page 2.1-1a) of the plan, Figure 2.1.1 and the NUREG-0654 cross-reference have been revised to specify that the Director of Local Response is responsible for protective response.

A*

Section 2.1 has been revised to distinguish between primary and support responsibilities. Primary and support responsibilities are reflected in Figure 2.1.2, with single functions cited.

*See footnote at the end of comments for element A.2.a which are continued on page 7.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 7 of 59

NUREG-0654

Element

Review Comment(s)

Rating

A.2.a
(Cont'd)

Procedure OPIP 2.1.1 has been revised to assign primary responsibility for the following functions to one position within LERO:

- Public Information and Notification - Coordinator of Public Information. However, Figure 3.8.1 should also be corrected for Public Information functions.
- Accident Assessment - Radiation Health Coordinator
- Medical and Public Health - Emergency Medical Service Coordinator
- Traffic Control - Traffic Control Coordinator

Figure 3.3.7 assigns primary responsibility for alerting the general public to the LERO Director of Response. The LERO Coordinator of Public Information is responsible for providing public information. Figure 3.3.7 has been revised to indicate that FEMA has no primary responsibility for notifying the public during a radiological emergency. However, FEMA should be included in Figure 3.3.7 to indicate that it coordinates the dissemination of all public information concerning Federal nontechnical emergency response activities and ensures that public information releases are coordinated with State/local authorities and the NRC (see page 2.2-4a, lines 10-15 of the plan).

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 8 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.2.b

Attachment 1.4.1 refers to legal authority under 10 CFR 50.47 (c)(1) which provides as follows:

[*

Failure to meet the standards set forth in paragraph (b) of this subsection** may result in the Commission declining to issue an Operating License; however, the applicant will have an opportunity to demonstrate to the satisfaction of the Commission that deficiencies in the plans are not significant for the plant in question, that adequate interim compensating actions have been or will be taken promptly, or that there are other compelling reasons to permit plant operation.

LILCO has indicated in their summary of responses to the consolidated RAC review for Revision 3 of the plan (see page 2 of 13), that this is a legal authority issue to be addressed elsewhere and there is no modification to Revision 4 of the plan. Therefore, the legal authorities/bases of the LERO plan are not yet defined and for this reason, the element has been rated inadequate.

The utility has developed LERO, comprised of utility, Federal, and private individuals. If New York State and Suffolk County implement an emergency plan, LERO would follow their lead (see Section 1.4, pages 1.4-1 - 1.4.2; also, Attachments 1.4.1 and 1.4.2).

*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

**Standards A-P specified in criteria defined in NUREG-0654; FEMA-REP-1 Rev. 1. Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants - For Interim Use and Comment", January 1980.

LILCO Transition Plan for Shoreham - Revision 4
 Consolidated RAC Review
 Dated October 12, 1984

NUREC-0654
Element

Review Comment(s)

Rating

A.3

Appendix B contains letters of agreement for the following support organizations identified in Section 2.2 of the plan.

I*

| | <u>Signed</u> | <u>Dated</u> |
|--|---------------|--------------|
| • DOE/Brookhaven National Laboratory | Yes | Yes |
| • WALK radio | Yes | Yes |
| • WBLI radio | Yes | Yes |
| • WCTO radio | Yes | Yes |
| • WGSM radio | Yes | Yes |
| • WLIM radio | Yes | Yes |
| • WLIX radio | Yes | Yes |
| • WLNG radio | Yes | Yes |
| • WRCN radio | Yes | Yes |
| • WRHD radio | Yes | Yes |
| • WGLI radio | Yes | Yes |
| • WRIV radio | Yes | Yes |
| • U.S. Coast Guard | Yes | Yes |
| • New York Telephone | Yes | Yes |
| • Marketing Evaluations, Inc. | Yes | Yes |
| • American Red Cross | Yes | Yes |
| • Island Helicopter Corp. | Yes | Yes |
| • Institute of Nuclear Power Operators | Yes | Yes |

The plan states that: It is anticipated that all local law enforcement agencies, fire departments and snow removal agencies within the 10-mile EPZ will continue to carry out their normal response functions during an emergency."

Revision 4 of the LILCO Transition Plan contains no letters of agreement which assure that local law enforcement agencies, fire departments and snow removal agencies within the 10-mile EPZ will continue to carry out their normal response functions during a radiological emergency at SNPS. However, page 1.4-2b of the plan references

*See footnote at the end of comments for element A.3 which are continued to page 12.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 10 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.3
(Cont'd)

Public Laws detailing the responsibilities for snow removal, fire safety, and police actions defined in the Suffolk County Charter.

Letters of agreement and contracts with bus and ambulance suppliers are included in Appendix B for the following resources:

- Bus Companies
 - 1,236 40-passenger school buses
- Ambulance companies
 - 63 ambulances
 - 130 ambuletts

Bus resources available are adequate to fulfill the potential requirement for 333 40-passenger buses (see Appendix A, page IV-746). The ambulance and ambulette resources available appear adequate to fulfill the potential requirements of the special facilities list in Procedure OPIP 3.6.5. A determination of the overall adequacy of these ambulance and ambulette resources must await tabulation of the transportation needs of non-institutionalized mobility impaired (see example Invalid/Disabled Evacuation Listing, Zone Q, Procedure OPIP 3.5.5, Attachment 1). The directory of noninstitutionalized mobility impaired individuals is being compiled and would be examined by FEMA at an exercise of off-site emergency preparedness (see also analysis comments for element J.10.d).

Although the revised LILCO Transition Plan does not specify the number of bus drivers that have been trained and licensed, Figure 2.1.1 (page 3 of 4) specifies that 333 LERO bus drivers are assigned to the three (3) staging areas as follows:

| | |
|------------------|------------|
| ● Port Jefferson | 108 |
| ● Riverhead | 100 |
| ● Patchogue | 125 |
| Total | <u>333</u> |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 11 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.3
(Cont'd)

LILCO commits in their summary of the consolidated RAC review for Revision 3 of the plan (see page 3 of 13), that at least this number of bus drivers will be trained, licensed and available to respond to a radiological emergency at SNPS.

The supplementary letter of agreement from DOE (dated June 18, 1984), confirms that DOE has agreed to provide two, 2-man field monitoring teams and additional teams, if needed. It is evident from this letter and the plan that a DOE representative will be dispatched to the local EOC to coordinate the relay of field monitoring data for use in off-site dose assessment which will be completed by the LERO Radiation Health Coordinator. The DOE letter of personnel commitment is adequate.

The letters of agreement including contracts, purchase orders, proposals, etc. are adequate for the following support organizations (persons or representatives of outside agencies):

- Central Suffolk Hospital
- Laboratories which provide environmental sample analysis
- Radiation Health Coordinator
- Nuclear Engineer
- Gasoline purchases
- Bus Transfer Points

The Letters of Agreement with the State of Connecticut, EPA, and USDA are adequate (see Appendix B, pp. B-72, B-76, and B-77).

The letter of understanding with FAA should be a letter of agreement from the agency to LILCO (see Appendix B, B-54).

The letter of understanding with the American Red Cross states that the American Red Cross will set up relocation centers at a predesignated facility or facilities to be listed in the LILCO Transition Plan.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 12 of 59

NUREG-0654
Element

Review Comment(s)

Rating

A.3
(Cont'd)

Since the Relocation Center Coordinator, Nursing Support staff and Counseling Coordinator are American Red Cross personnel, no separate letters of agreement are needed with these individuals.

There are no letters of agreement included in the LILCO Transition Plan with the facilities designated to serve as relocation centers. This element has been rated inadequate because the plan must contain letters of agreement with the facilities to be used for the monitoring and decontamination of evacuees.

Since the list of services to support a Federal response is included in the plan only to expedite the identification of where these services are available, no letters of agreement with these businesses are necessary.

*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

A.4

The LERO Director of Local Response is responsible for ensuring the continuity of emergency resources for 24-hour operations over a protracted period.

A

The establishment and maintenance of LERO over a protracted period is described in Section 2.1, page 2.1-1, line 26-29; page 2.1.2, lines 36-39 and Procedure OPIP 2.1.1.

The NUREG-0654 cross-reference has been revised to include Procedure OPIP 2.1.1 as a citation for element A.4.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

NUREG-0654
Element

Review Comment(s)

Rating

C.

Emergency Response Support and Resources

C.1.a

According to the plan, the LERO Director of Local Response requests the Governor to ask the President to declare an emergency or disaster.

A*

Revision 4 of the LILCO Transition Plan has been changed to specify that Federal assistance in a radiological emergency at SNPS would be coordinated by FEMA in accordance with the Federal Radiological Emergency Response Plan (FRERP).

The NUREG-0654 cross-reference has been revised to include Attachment 2.2.1 as a citation for element C.1.a.

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

C.1.b

The DOE-RAP is specified to provide radiological monitoring assistance and expected times for arrival are provided.

A

Specific resources and approximate resource time(s) for Federal agencies (including USCG, EPA, NRC and USDA) have been included in Revision 4 of the LILCO Transition Plan (see page 2.2-1 and Attachment 2.2.2).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 14 of 59

| <u>NUREG-0654 Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-------------------------------|---|----------------|
| C.1.c | <p>The LILCO Transition Plan identifies resources that are available to support the Federal response.</p> <p>The inclusion of services provided by federal agencies under provisions of the Federal Radiological Emergency Response Plan (FRRP) are sufficient to satisfy that resources have been identified by the Federal agencies participating in FRRP. LILCO has obtained separate letters from EPA and USDA which identify resources needed to support their effort.</p> | A |
| C.2.a | <p>LERO representatives are already at the SNPS site and may be dispatched to the near-site Emergency Operations Facility (EOF).</p> | A |
| C.3 | <p>Page 3.5-2 of the plan identifies a minimum of two (2) ORS teams from DOE-RAP for monitoring services and several other organizations for analyses.</p> | A |
| C.4 | <p>The letters of agreement with facilities to be used as relocation centers are missing. This element has been rated inadequate because the plan must contain letters of agreement with the facilities to be used for the monitoring and decontamination of evacuees. Also see analysis comments for element A.3.</p> | 1 ^a |

*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 15 of 59

| <u>NUREG-0654</u> <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-------------------------------------|--|---------------|
| D. | <u>Emergency Classification System</u> | |
| D.3 | The Emergency Classification System described in Chapter 3, Section 3.2, page 3.2-1 conforms with the system set forth in Appendix I of NUREG-0654; FEMA-REP-1, Rev. 1. | A |
| D.4 | The emergency action procedures to be taken are adequately described in Chapter 3, Concept of Operations and the Implementing Procedures OPIP 1.1.1 through 5.4.1. | A |
| E. | <u>Notification Methods and Procedures</u> | |
| E.1 | <p>The notification and mobilization of emergency response organizations including the verification of messages is outlined in Section 3.3, page 3.3-1 and Procedures OPIP 3.3.2, 3.3.3 and 3.3.4. The LILCO Customer Services Office in the Hicksville Operations Center is the primary LERO notification point.</p> <p>Figure 3.3.4 (4 pages) has been revised to identify persons/groups/organizations to be notified at general emergency.</p> | A |
| E.2 | <p>The necessary procedures for alerting, notifying, and mobilizing emergency response personnel are found in Procedure OPIP 3.3.2.</p> <p>Section 3.4, page 3.4-5 which describes the LILCO paging system, and Figure 3.4.1 have been added to the NUREG-0654 cross-reference as citations for element E.2.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 16 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| E.5 | <p>The plan establishes a system for disseminating appropriate information contained in initial and follow-up messages received from the licensee, including the appropriate notification to the broadcast media.</p> <p>The notification system described throughout the plan is termed the Emergency Broadcast System (EBS). This system, which is a network of Long Island radio stations, with WALK as the entry station, is not the official Emergency Broadcast System (EBS) for Long Island.</p> <p>LILCO, in its summary of responses to the consolidated RAC review for Revision 3 of the plan has stated that "following statement was received from R.W. Seddon, Chief, Emergency Communications Division, FCC on 6/22/84: 'Radio stations are authorized to activate the Emergency Broadcast System upon receipt of a request to activate from a reliable authority. Stations may also activate the EBS at their own discretion <u>without</u> receiving a request from outside sources.' (Emphasis on original.) Therefore, the use of the term 'EBS' within the LERO framework is appropriate." FEMA is currently verifying the accuracy of this statement with FCC.</p> | A* |

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 17 of 59

NUREG-0654
Element

Review Comment(s)

Rating

E.6

The prompt notification system consists of 89 fixed sirens, tone activated radios provided to special facilities, (i.e., schools, hospitals, medical support hospitals, handicapped facilities, ambulance companies, nursing homes, and major employers, etc.), EBS, and a mobile public address system. Marketing Evaluations Incorporated will verify that each siren has activated (see page APP-B-53). The plan adequately covers the need to demonstrate, under NUREG-0654 criteria, that there are means to notify the public.

A*

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

E.7

The draft messages intended for the public found in Procedure OPIP 3.8.2 satisfy NUREG-0654 requirements.

A

Draft EBS messages are included in the plan for the following conditions:

- Unusual Event - No EBS message is to be aired during an Unusual Event.
- Alert (No radiation release)
- Site Area Emergency (No radiation release)
- Site Area Emergency (Radioactive release).
- General Emergency (Sheltering)
- General Emergency (Sheltering and Evacuation)
- General Emergency (Evacuation)

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 18 of 59

NUREC-0654
Element

Review Comment(s)

Rating

E.7
(Cont'd)

Procedure OPIF 3.8.2 includes the following additional draft messages:

- EBS Activation Advisory
- Alert (Release of Radiation)
- De-Escalation of Emergency
- Termination of Emergency
- Test Message for EBS
- Spurious Activation Message of Prompt Notification Siren
- Description of Emergency Planning Zones for Suffolk County (to be included in EBS messages).

The plan details how press conferences will be conducted. Based on FEMA's exercise experience, it is helpful to have emergency information bulletins available for use by decision-makers, the press, rumor control, and other PIOs.

Radio emergency information bulletins contained in the plan include dosage information. Such information should be presented in less technical language in order to maximize the general public's understanding of this information.

Sample EBS messages should include, as appropriate, information for farmers, food distributors, food processing facilities, etc.

During the RAC review of Revision 4 of the LILCO Transition Plan, the following suggestions were made. These do not affect the adequate (A) rating for this element.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 19 of 59

NUREG-0654

Element

Review Comment(s)

Rating

E.7
(Cont'd)

- All of the general emergency draft EBS messages presume that there is an ongoing radiation release. Based on changes that have been made in the revised plan, the general emergency can be declared on the basis of plant conditions before a release of any significance occurs. (See also Procedure OPIP 3.8.2, Attachment 4, EBS messages F, G and H.)
- If the emergency classification reached general emergency based on entry into a core melt/severe accident sequence, it is unlikely that de-escalation, as addressed here, can occur. The EBS message should discuss entry into the recovery phase instead (see also Procedure OPIP 3.8.2, Attachment 4, EBS Message 1).

F.

Emergency Communications

F.1.a

Provision for 24-hour activation of the LERO emergency response network is accomplished via the RECS line in the LILCO Customer Service Office in the Hicksville Operations Center (see Section 2.1, page 2.1-7 and Section 3.4, pages 3.4-1 to 3.4-5). This RECS line is monitored on a 24-hour basis and the LERO officer at the Customer Service Office is responsible for activating the paging system which notifies key emergency response personnel that an actual incident has occurred.

A

The LILCO Notification Radio System serves as the backup communication system to the RECS for communications between the Shoreham Control Room and the LILCO Customer Service Office.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 20 of 59

NUREG-0654
Element

Review Comment(s)

Rating

F.1.b

Section 3.4 E (page 3.4-4) provides for communications from LERO to Suffolk County, Nassau County, New York State, and Connecticut via commercial telephone and centrex.

A

Since no portion of the State of Rhode Island is within 50 miles of SNPS (see Figure 1.1.1), the issue of provisions for communication with Rhode Island is not a concern.

The NUREG-0654 cross-reference has been revised to include Section 3.4, page 3.4-4 as a citation for element F.1.b.

F.1.c

The plan provides for notification of the following federal emergency response organizations (See plan, Chapter 2, pages 2.2-4 - 2.2-4f):

A

- FEMA
- NRC
- DOE
- USDA
- DOC
- DOD
- HHS
- DOT
- EPA
- U.S. Coast Guard (USCG)
- Federal Aviation Administration (FAA)

Figure 3.3.4 (see page 3 of 4) has been revised to include NRC, FDA, DOE, USDA, DOC, EPA, and HHS (Public Health Service).

The notification of other federal emergency support organizations will be completed by FEMA (see page 2.2.4, lines 29-30 and 45-47; page 2.2-4a, lines 1-8).

Provision for notification of the Long Island Railroad should be addressed in the plan.

LILCO Transition Plan for Shoreham - Revision 4
 Consolidated RAC Review
 Dated October 12, 1984

NUREG-0654
Element

Review Comment(s)

Rating

F.1.d

Communication between the local EOC in Brentwood, New York and the licensees EOF (or TSC) is maintained via the following means (see Figure 3.4.1):

A

- RECS line
- commercial telephone
- radio
- dedicated telephone

The RECS line will allow 24-hour per day notification between the plant and LERO. Communication with the radiological field monitoring teams is maintained via radio link.

F.1.e

The provisions for alerting and activating emergency response personnel in each response organization as described in Section 3.3, pages 3.3-1-4; Figures 3.3.2, 3.3.3 and 3.3.4 of the plan and Procedure OPIP 3.3.2 are adequate.

A

Figure 3.3.4 has been revised to specify that the notification list of persons/groups/organizations to be notified at site area emergency and general emergency are the same (see comment for element E.1, above).

F.2

Communications with fixed and mobile medical support facilities are specified in the plan as follows:

A

Means

- | | |
|-------------------------------|--|
| • Ambulance dispatch stations | commercial telephone and radio |
| • Ambulance drivers | radio link via dispatch station |
| • Hospitals | commercial telephone and radio links via ambulance dispatch stations and mobile ambulance units. |

LILCO Transition Plan for Shoreham - Revision 1
Consolidated RAC Review
Dated October 12, 1984

Page 22 of 59

NUREG-0654
Element

Review Comment(s)

Rating

F.3

Communication drills will be conducted by LILCO (see Section 5.2, Part A, page 5.2-2a). Communications will be tested monthly; while communications between the plant, the local EOC, and field monitoring teams will be tested annually. Also, see page 3.4-7.

A*

The plan has been revised to include the required frequency of siren tests in accordance with NUREG-0654, Appendix 3, page 3-12, Section h(2).

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for Details).

G

Public Education and Information

G.1a-d

Section 3.8, pages 3.8-1-3 of the plan provides for the dissemination of brochures to the public which include the information required by NUREG-0654. The information to be provided will include:

A

- educational information on radiation
- contact for additional information
- protective measures
- survey card on special needs of the handicapped.

Educational brochures will be mailed to all households and commercial establishments. LILCO plans to use their billing lists for the mailing. In addition, inserts will be developed for the Suffolk telephone directory which will include the following:

- Map of 10-mile EPZ/emergency planning zone
- List of EBS stations
- Siren system description/purpose

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 23 of 59

NUREG-0654
Element

Review Comment(s)

Rating

G.1.a-d
(Cont'd)

- Protective actions the public may be advised to take (sheltering, evacuation)
- Relocation center locations
- Items to take along for an evacuation.

Local telephone directories will also contain the above items. In addition, these local directories will contain maps showing evacuation routes.

Brochures will be updated on an annual basis, and an annual orientation of news media will be reinforced during annual exercises.

The suggestion to use a nomenclature different than EBS is no longer an issue pending FEMA's clarification of LILCO's correspondence with FCC (see comment for E.5, above).

G.2

The public information program and provisions for its dissemination as described in Section 3.8 of the plan are adequate.

A

G.3.a

The emergency news center (ENC) is to be established in the Quality Inn, Old Mill in Ronkonkoma, New York. This facility will be set up as the central clearing house for the release of information received from the utility and LERO representatives (see Section 3.8, page 3.8-4). The plan provides that "private and public agency/or organization representatives (i.e., American Red Cross, Suffolk County, FEMA, NRC, State officials, etc.) will be invited to participate as a panel in all news conferences."

A*

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 17, 1984

Page 24 of 59

NUREG-0654
Element

Review Comment(s)

Rating

G.3.a
(Cont'd)

The NUREG-0654 cross-reference has been revised to include page 3.8-1 as a citation for element G.3.a.

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

G.4.a

The LERO Coordinator of Public Information (CPI) and LILCO's Emergency News Manager at the ENC is the designated spokesperson(s) for LERO.

A

G.4.b

LERO Public Information Personnel at the ENC are charged with the responsibility "to provide accurate information (to the media) on a timely basis."

A

G.4.c

The ENC is designated as the central location for rumor control. The rumor control point is for the use of utility personnel at the LILCO Customer Relations District Offices and the LILCO Customer Call Boards, in answering questions asked by the public. The rumor control point will be staffed by representatives from LERO and the utility.

A

The plan does not provide information about rumor control staffing, the number of rumor control telephone lines that will be available and staffed, and how current information will be provided to the rumor control staff. It is recommended that the rumor control staff be provided with press releases and radio emergency information bulletins to assure that they are apprised of the current emergency status. The effectiveness of the rumor control system would be evaluated during an exercise of off-site radiological emergency preparedness.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 25 of 59

NUREG-0654
Element

Review Comment(s)

Rating

G.5

LERO will coordinate an annual orientation program for the news media. This program will familiarize the media with the following:

A

- Utility emergency plans
- Radiation information
- Points of contact for release of public information in the event of an emergency
- The location and operation of the ENC.

H.

Emergency Facilities and Equipment

H.3

The local EOC to be operated and staffed by LERO personnel is located at the LILCO Operations Facility in Brentwood, Long Island, New York.

A

H.4

The activation and staffing of the local EOC by LERO personnel is specified in Section 3.3, page 3.3-1; Section 4.1 page 4.1-1 and Procedure OPIP 4.1.1 of the plan.

A*

The issues that resulted in the provisionally adequate rating for Revision 3 of the plan have been resolved.

- The Radiation Health Coordinator and Nuclear Engineer have been added to the notification plans and procedures (see Figures 3.3.3 and 3.3.4; Procedure 3.3.2).
- Figure 3.3.4 (4 pages) has been revised to identify persons/groups/organizations to be notified at general emergency (see comments for elements E.1 and F.1.e).
- The plan has been clarified to state that upon his arrival at the local EOC, the Director of LERO will establish contact with the LILCO EOF and the New York State EOC (see Plan, Chapter 4; Section 4.1. A).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 26 of 59

NUREG-0654

Element

Review Comment(s)

Rating

H.4
(Cont'd)

- The notification of the New York State EOC (page 4.1-1, line 44) should be reviewed. Since the RECS line is no longer operational, the State EOC will, in all likelihood, not be operational. This notification should probably be to the State Warning Point.
- Due to changes made in Revision 4 of the LILCO Transition Plan, the locations of several functions performed have been changed to Brookhaven National Laboratory. However, changes have not always been made in both the plan and the affected procedures. For example, the RAP Team Captain, Environmental Survey Function and Dose Assessment Function are located at the DOE Brookhaven Area Office; not the local EOC according to Procedure OPIP 3.3.3 (see Section 5.2.6, page 2; Section 5.4.2, page 8). Procedures OPIP 2.1.1, 3.3.3, 3.5.1, and 3.5.2 should be revised to be consistent with the plan.
- The NUREG cross-reference has been revised to include Procedure OPIP 4.1.1 as a citation for element H.4 (see cross-reference, page XV, H).

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

H.7

The two (2) Offsite Radiological Survey (ORS) teams, each consisting of two (2) individuals per team from DOE-RAP are provided in the plan. These teams will obtain their ORS kits at Brookhaven National Laboratory (BNL).

A

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 27 of 59

| <u>NUREG-0654</u> <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-------------------------------------|--|---------------|
| H.7 (Cont'd) | <p>Equipment is shown for the two ORS teams on page 4.4-1.</p> <p>The plan has been revised to clarify that the LILCO ORS kits to be stored and maintained at the local EOC in Brentwood are back-up equipment that will be used by DOE-RAP team members if required (see Pages 3.5-2a and 4.4.1; Procedure OPIP 3.5.1, section 5.1.1.b).</p> <p>The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.5.1 as a citation for element H.7. See cross-reference, P. XV, H.</p> | |
| H.10 | <p>Section 5.3 of the plan provides that LILCO will inspect, inventory and operationally check emergency response equipment at least once each calendar quarter. Calibration of instruments will be done at intervals recommended by manufacturers. The plan also makes provision for reserve equipment.</p> <p>The availability and maintenance of backup field monitoring equipment at the local EOC in Brentwood has been clarified in the plan.</p> | A |
| H.11 | <p>A detailed list of equipment to be used in the emergency response by LERO is located in the portions of the plan listed in the NUREG-0654 cross-reference.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 28 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|------------------|---|---------------|
| H.11 (Cont'd) | <p>The equipment list in Procedure OPIP 3.5.1 has been modified to indicate that the inventory is for one (1) complete ORS kit. According to LILCO's response contained in their summary of responses to the consolidated RAC review for Revision 3 of the plan, three (3) sets of backup equipment for the ORS teams will be maintained at the local EOC in Brentwood. However, the plan is not consistent. Page 4.4-1 states that <u>three</u> ORS kits are maintained at the Brentwood EOC. Procedure OPIP 3.5.1, Section 5.2.1 states that <u>two</u> ORS kits are kept at the local EOC. This inconsistency should be resolved.</p> <p>Radio communications will be maintained between the field teams and the DOE-RAP team captain located at the DOE Brookhaven Area Office (see page 3.5-2a of the plan). A DOE-RAP team liaison will be deployed to the local EOC in Brentwood to complete the communications between field teams and the EOC. Page 3.5-2a, lines 27-28 states that the radio communication will be provided by DOE-RAP. However, the ORS inventory shown in Attachment 3 of Procedure OPIP 3.5.1 shows item 34 to be a two-way radio. It is unclear why the ORS kit inventory in Procedure OPIP 3.5.1 contains a radio for field team communications which will be supplied by DOE-RAP. This issue should be clarified in the plan and procedures.</p> <p>The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.5.1 as a citation for element H.11.</p> | |
| H.12 | <p>Page 3.5-2 of the plan states that field data will be radioed back to the Environmental Survey Function and all samples will be returned to the local EOC, or as directed, for laboratory analysis by DOE-RAP or SNPS labs.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 29 of 59

NUREG-0654
Element

Review Comment(s)

Rating

I.

Accident Assessment

The LILCO Transition Plan has been revised to specify that LERO will depend solely upon DOE-RAP for radiological field monitoring and dose assessment functions. Although the review of DOE-RAP procedures is outside its responsibility, the RAC acknowledges that the DOE-RAP systems are adequate to accomplish the field monitoring and dose assessment functions described in the plan.

Since Revision 4 of the plan includes LERO radiological procedures, these have been reviewed for compliance with this planning standard. The LERO procedures apparently remain from Revision 3 wherein LERO was to provide field monitoring teams, if needed. According to the revised plan, LERO relies solely upon DOE-RAP and therefore the intent of including LERO radiological procedures in the plan is now unclear. While it is appropriate to include in the plan LERO's interface with DOE-RAP as well as a discussion of communication plans, consideration should be given to removing the LERO radiological procedures. Deletion of the LERO radiological procedures to comply with LERO's complete technical reliance on DOE-RAP, as stated in the plan, would result in conversion of the inadequate (I) ratings within this planning standard to adequate (A) ratings.

I.7

The capability and resources for field monitoring within the plume exposure EPZ are to be provided through the DOE-RAP resources at the Brookhaven Area Office. The capabilities, mobilization, response time, and equipment for these resources are provided in the FRMAP plan for the support of local emergency response plans.

I

It should be noted that the LERO radiological procedures are still included in the plan. These procedures apparently remain from Revision 3 wherein LERO was to provide field teams if needed. In Revision 4, there is no plan to use LERO personnel since DOE-RAP will perform field monitoring functions; therefore, the LERO radiological procedures should be deleted from the plan.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 30 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-----------------|--|---------------|
| I.7 (Cont'd) | <p>The revised plan clarifies that the information provided in Attachment 2.2.1 is the equipment in the DOE-RAP team kits, and the equipment in Procedure OPIP 3.5.1 is in the LILCO ORS kits.</p> <p>Page 7 in Procedure OPIP 3.5.1 has not been changed in Revision 4. The plan at page 3.5.2a, lines 3-6, states that laboratory analysis can be performed. The potential problem alluded to in line 3 of page 3.5-2a (i.e., the calculation of thyroid dose from the iodine samples taken in the field) has not been addressed by any changes in the operating procedures set forth in Procedure OPIP 3.5.1, which should provide for expedited laboratory analysis.</p> | |
| I.8 | <p>The capabilities, equipment and expertise for accident and dose capabilities are found in Procedure OPIP 3.5.2. Field team composition, communication, monitoring equipment and estimated deployment times are found in Section 3.5 and Procedure OPIP 3.5.1. Page 3.5-2 of the plan gives field team composition.</p> <p>Pages 3.1-2 and 4.1-2 of the plan specify that the LERO Director of Local Response, with the Radiation Health Coordinator, is responsible for formulating the protective action decisions.</p> <p>A Nuclear Engineer has been added to the LERO emergency response staff (see Figures 3.3.3, 3.3.4, 3.5.2; page 3.5-2). This individual is responsible for evaluating the plant status to determine the potential for a radiological release in making protective action recommendations. However, the guidance given in Section 5 of Procedure OPIP 3.6.1 and Attachment 5 thereto does not include all of the pertinent variables (e.g., wind speed). Also see analysis comments for element H.4, where related issues are discussed.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 31 of 59

NUREG-0654
Element

Review Comment(s)

Rating

I.8
(Cont'd)

Changes in the plan made outside the RAC review comments for Revision 3 of the LILCO Transition Plan have resulted in some discrepancies. While it is understood that only a DOE-RAP liaison will now report to the local EOC, (see Figure 2.1.1, page 2 of 4), there are currently a number of citations which call for the DOE-RAP management to report to the local EOC. For example, Procedure OPIP 2.1.1 shows the DOE RAP Team Captain, Dose Assessment Function and the Environmental Survey Function, all DOE responsibilities, as reporting to the local EOC. Also, Procedure OPIP 3.5.1 discusses contact with the Environmental Survey Function at the local EOC in several places.

I.9

Section 2.2, Attachment 2.2.1 states that the DOE Brookhaven Area Office can provide support to LILCO for airborne radiiodine sampling and analysis to concentrations as low as 5×10^{-8} .

Procedure OPIP 3.5.1, Section 5.3.7b has been changed from "...if moisture check dot is blue," to ... "if moisture check dot is pink." This change now makes the procedure workable.

The revised procedures now call for measurement of the particulate filter activity in all cases. The procedure has also been revised to include an explanation and precaution for the mix and decay of radioisotopes released. The procedure has also been revised to include provisions to verify field measurements with laboratory measurements for samples exhibiting activity when release assumptions are not valid.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 32 of 59

NUREG-0654
Element

Review Comments

Rating

I.9
(Cont'd)

Although LILCO's summary of the consolidated RAC review comments for Revision 3 states that expedited laboratory analysis will be made, the Procedure (OPIP 3.5.2 Section 3.3) does not include provisions for expediting this analysis. Further, Procedure OPIP 3.5.1 does not call for an expedited return of these samples to the laboratory. In fact, the discrepancies about where the location of the Environmental Survey Function, discussed in the comment for element I.9, is also of concern here. The instructions in Procedure OPIP 3.5.1 are to be returned to the Emergency Worker Decontamination Center at the local EOC where they will be transferred to the Environmental Survey Function and taken into the EOC for further analysis. The plan should be revised to clarify that sample media will be taken to Brookhaven National Laboratory for analysis.

Attachments 5 and 6 of Procedure OPIP 3.5.2 have been removed and incorporated into a computerized procedure. The RAC comments for Revision 3 of the plan with regard to the nomogram are still valid. The assumptions used in the computerized approach may not be realistic.

I.10

The procedures for estimating integrated dose from the projected and actual dose rates (plume exposure) were found in Procedure OPIP 3.5.2. Ingestion pathway dose estimations were found in Procedure OPIP 3.5.3. Procedure OPIP 3.6.1 contains protective action recommendations.

The LERO plan adequately describes provisions for relating measured parameters to projected estimated dose commitments and provides for relating ground deposition to need for additional protective actions. Procedure OPIP 3.5.1 now includes a ground deposition survey with an H.P. 210 survey meter.

I

LECO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 33 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|------------------|--|---------------|
| I.10 (Cont'd) | <p>As noted above in the discussion for element I.9, inclusion of the required information in a computerized procedure may not be adequate, since the previous revision of the plan did not contain the required nomograms, and in the current revision this information has been incorporated into a computer program. LERO anticipates that DOE-RAP will carry out dose assessment computations and, therefore, the LERO computerized methodology may not be necessary. FEMA will evaluate the capability to obtain accurate dose assessment calculations during an exercise of off-site radiological emergency preparedness. The current version of the plan does not contain a method for manual calculation of dose. A procedure for manual calculation was contained in Revision 3 of the plan in the event of computer malfunction. It appears that Revision 4 addresses a problem by removing the affected pages of the plan not necessarily by correcting the problem. If LERO decides to retain their procedure described in the plan, documentation of the computer program should be provided to FEMA for review.</p> <p>The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.6.1 as a citation for element I.10.</p> | |
| I.11 | <p>Capabilities to locate and track the plume (field monitoring) are to be provided through the DOE-RAP resources at the Brookhaven Area Office. The capabilities, mobilization, response time, and equipment for these resources are provided in the SRMAP plan for the support of local emergency response plans (see Attachment 2.2.1 of the plan).</p> <p>Procedure OPIP 3.5.1 Section 5.3 has been included in the NUREG-0654 cross-reference as a citation for element I.11.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 34 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| J. | <u>Protective Response</u> | |
| J.2 | <p>The provisions for evacuation of SNPS non-essential site personnel in Section 3.6 (page 3.6-8a) describe the route to be taken if a public evacuation is in progress (i.e., high traffic density). The plan has been revised to specify that, depending on radiological or meteorological conditions, SNPS non-essential personnel would be instructed either to report home or to the Wildwood Substation. LILCO's summary of responses to the consolidated RAC review comments for Revision 3 (see page 7 of 13) clarifies that the evacuation route for non-essential site personnel is the same regardless of a public evacuation in progress or whether there is inclement weather.</p> <p>The plan has also been revised to specify that evacuees from the SNPS site would leave in the same personal vehicles they used to travel to the site.</p> | A |
| J.9 | <p>EPA's plume exposure and FDA's ingestion pathway PAGs are listed in Section 3.6.</p> <p>A Nuclear Engineer has been added to the LERO emergency response staff. The procedures to be used by this individual are set forth in Procedure OPIP 3.6.1 (see comments for elements I.8 and J.10.m).</p> <p>The most recent FDA guidance has been incorporated in the plan (see Section 3.6, page 3.6-3, line 7). However, the FDA Emergency PAGs for ingestion are for projected doses of 5 rem whole body and 15 rem to the thyroid; not 25 rem thyroid as stated in the plan. Also, the interpretation of how to use the response level tables (i.e., instructions contained in the footnotes) has been incorrectly transcribed from the Federal Register referenced in the plan. In addition, page 3.6-2 lines 46 and 47, should state "5" nuclides, and include Cs-134.</p> <p>The NUREG-0654 cross-reference has been revised to include Table 3.6.1 as a citation for element J.9.</p> | I |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 35 of 59

NUREG-0654
Element

Review Comment(s)

Rating

J.10.a

The Evacuation Plan (Appendix A Section I-Preface pages I-1 to I-2) is made up of two plans -- a study performed by Suffolk County as part of an agreement with LILCO (9/21/81), and a study performed by KLD Associates under an agreement with LILCO to develop an evacuation plan (12/30/81). LILCO has integrated the two studies into Appendix A.

A*

The maps showing evacuation routes, evacuation areas, preselected offsite radiological monitoring locations (including Figure 3.5.1 and Procedure OPIP 3.5.1 listing designators for these locations) and shelter areas are included in the plan.

The relocation centers identified in the LILCO Transition Plan have been changed in Revision 4 to the following locations:

- St. Joseph's College - Patchogue
- BOCES - Islip
- Dowling College - Oakdale
- SUNY - Farmingdale

With the exception of Dowling College, the relocation centers are shown on Figures 9-28 of Appendix A. Dowling College should be shown on Figure 28.

The NUREG-0654 cross-reference should be revised to include Attachments 10 and 11 of Procedure OPIP 3.5.1 as a citation for element J.10.a.

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 36 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| J.10.b | <p>The plan has been revised to specify that some evacuation zones (i.e., Zones F and K) have been subdivided into subzones for planning purposes. Zones would be evacuated in their entirety and therefore, a map depicting subarea boundaries within these zones is not necessary.</p> <p>A map (see Figure 7.1) has been included in Revision 4 of the plan which depicts the population by ERPA projected for 1985 for winter and summer.</p> | A |
| J.10.c | <p>The means for notifying the transient and resident population consists of fixed sirens (89 units) and EBS.</p> <p>The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.3.4, Section 5.4 (notification of the deaf) as a citation for element J.10.c.</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p> | A* |
| J.10.d | <p>The procedures and inventory of requirements for protecting institutionalized mobility impaired persons are being completed.</p> <p>The means and procedures for completing the directory of non-institutionalized mobility impaired individuals is adequate. The listing of non-institutionalized mobility impaired individuals is being placed into LILCO computers to allow for updating and quick retrieval. The Special Facilities Evacuation Coordinator will have a printout of the Invalid/Disabled Evacuation Listing (see Procedure OPIP 3.6.5, page 2 of 20, Section 4.0; and Attachment 1). The computer listing of invalid/disabled persons will be kept at the local EOC and can also be printed out directly by computer at the Brentwood facility, thereby ensuring the availability of up-to-date information. The listing to be</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 37 of 59

NJREG-0654
Element

Review Comment(s)

Rating

J.10.d
(Cont'd)

compiled codes seven (7) categories of needs including hearing, ambulatory (i.e., curbside pickup - including assistance) and non-ambulatory (i.e., ambulance and ambulette - includes wheelchair needs) to facilitate notification and the coordination of transportation equipment if relocation of these persons is necessary.

This directory of non-institutionalized mobility impaired individuals would be examined by FEMA at an exercise of off-site emergency preparedness.

J.10.e

The provisions for use of KI for emergency workers are discussed. The plan (see page 3.6.5, lines 10-12) and procedures (see Procedure OPIP 3.3.2, Sections 5.1.1c, and 5.2.1) have been revised to specify that each emergency worker who will enter the 10-mile EPZ will be issued one (1) KI tablet prior to being deployed to the field from the staging area to which they reported. This revision adequately overcomes the concern that emergency workers would need to be recalled from the field resulting in time delay in administering KI to them.

A

The bottles of KI tablets have a marked expiration date of June, 1985. This expiration date will be reviewed regularly (see Procedure OPIP 3.6.2, Section 3.1 and Procedure OPIP 5.3.1, Section 5.4.2).

J.10.f

Page 3.6-3, lines 22-24 of the plan state that the PAG for use of KI as a thyroid blocking agent is a projected dose of 10 rem to an emergency worker's thyroid. No provision is made for the general population which is consistent with New York State policy (see letter from J.L. Smith to Harold R. Denton, N.R.C. S.N.R. C-539 Attachment 1, page 4-J-10c clarification). The 10 rem PAG is considerably lower than the FDA Final Recommendation of 25 rem or greater projected thyroid dose. It would appear that LILCO has taken the more conservative lower limit of NCRP Report No. 55 (10-30 rem) or the original FDA draft recommendation (10-20 rem). Current FDA guidance (6/29/82 Federal

A*

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 38 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|--------------------|--|---------------|
| J.10.f (Cont'd) | <p>Register) for use of KI is at 25 rem projected thyroid dose commitment; not 10 rem as provided in Procedure OPIP 3.6.2 (see Attachment 1, page 2 of 2).</p> <p>The plan has been revised to specify that all LERO emergency workers will be taught about KI and its possible side effects during their training program. According to LILCO's summary of the consolidated RAC review of Revision 3 (see page 3 of 3), the training will specify that if an allergy to iodide is suspected, the emergency worker is instructed to consult his/her physician. The plan states that if emergency workers have allergic reactions to iodide, they will be told not to take the KI tablet issued to them at the staging area. These administrative measures are adequate to overcome the concern that procedures for screening emergency workers who would be given KI are included in the plan. Consideration should be given to not using personnel who are allergic to iodide, or controlling the distribution of KI to workers at the staging areas, and withdrawing these individuals from the field if the PAG for thyroid exposure is reached.</p> <p>Iodine release measurements and field data (or specific plant parameters/components) should be used as the bases for this determination, rather than the nomogram figure (see Procedure OPIP 3.6.2, Attachment 3, page 1 of 1).</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p> | |
| J.10.g | <p>The plan reflects the resources necessary for school or general evacuation including the number of buses to be used. Letters of agreement with the bus companies have been finalized and are contained in a separately-bound Appendix B.</p> <p>The Notification Call-Up List will now be a computer printout.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 39 of 59

NUREG-0654

Element

Review Comment(s)

Rating

J.10.g
(Cont'd)

The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.6.4 as a citation for element J.10.g. However, Procedure OPIP 3.6.5 has not been included as requested by the RAC review (see Plan, page XVI).

J.10.h

The relocation centers identified in the LILCO Transition Plan have been changed in Revision 4 to the following locations (see Chapter 4, Section 4.2, pages 4.2-1 and 4.2-1a):

A

● PRIMARY RELOCATION CENTERS

- BOCES, Islip - approximately 20 miles from SNPS
- St. Joseph's College, Patchogue -- approximately 16 miles from SNPS
- SUNY, Farmingdale - approximately 32 miles from SNPS.

● OVERFLOW RELOCATION CENTERS

- Dowling College, Oakdale -- approximately 21 miles from SNPS.
- Additional locations will be identified by the American Red Cross as necessary. The distance of additional locations identified by the American Red Cross could not be located in the plan. All of these centers would be set-up and operated by the American Red Cross.

Figure 4.2.1, Relocation Centers Location, is a map showing the centers. The Dowling College location should be included on the map(s) shown in Appendix A (see comment for element J.10.a, above).

J.10.i

The projected traffic capacities of evacuation routes under emergency conditions are shown in Appendix A, Section III, Table IV, pages III-17-33a. The necessary studies have been completed, and adequately satisfy NUREG-0654 requirements.

A

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 40 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| J.10.j | <p>The plan and procedures call for contacting the Coast Guard and FAA and requesting cooperation of these agencies for assistance (i.e., clearance of boats from Long Island Sound, restriction of aircraft activity, etc.). The LERO Traffic Control Coordinator is responsible for coordinating the road logistic aspects for an evacuation and coordinating the maintenance of traffic control points for an evacuation. The locations of approximately 138 traffic control posts are specified in Appendix A, Section IV, Figure 8, pages IV-52-65).</p> <p>Provisions for access control, to limit access to evacuated areas, is contained in Appendix A, Section IV, Evacuation Procedures (see Traffic Control, page IV-5).</p> <p>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</p> | A* |
| J.10.k | <p>The means for dealing with potential impediments to evacuation are addressed in Section 3.6, page 3.6-6 of the plan, Procedure OPIP 3.6.3 and Appendix A, page IV-5. Provisions for the removal of cars by tow trucks are adequate.</p> <p>The plan discusses the occurrence of adverse weather during evacuation (see Appendix A, page II-4).</p> <p>LILCO's summary of the consolidated RAC review for Revision 3 of the plan (page 8 of 13) indicates that snow removal efforts need not be coordinated with the emergency response for three reasons:</p> <ul style="list-style-type: none">● Except in emergency scenarios having very long lead times, the time required in a severe snow storm to clear all the extensive side streets and driveways would be too long to be of meaningful assistance. | 1* |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 41 of 59

NUREG-0654

Element

Review Comment(s)

Rating

J.10.k
(Cont'd)

- LERO would be recommending a protective action of sheltering in most cases regardless of the availability of snow removal services.
- If evacuation was recommended during a moderate snow fall, heavy traffic would prevent effective snow plow operations.

These reasons do not alleviate the need to coordinate pre-emergency planning for snow removal on the evacuation routes. Indeed, since LILCO relies on local snow removal organizations who may be accompanied by LERO personnel who will provide dosimetry to ensure that untrained workers do not receive doses in excess of PAGs for the general public (see comment for element A.1.b), the need to coordinate pre-emergency planning for snow removal along evacuation routes is greater in this particular case. This is especially true in view of the fact that since resources may be limited, there is a need to ensure that these resources would be used in an effective manner where sheltering may not be recommended. For example, it would be advisable to ensure that efforts are concentrated on keeping evacuation arteries rather than side streets, driveways, etc. clear. The plan is not clear as to how LERO could coordinate snow removal by normal response functions in the event, however unlikely, they would be needed during an emergency (see pages 2.2-4g and h of the plan). Therefore, pre-emergency planning for snow removal on the evacuation routes should be further developed to include administrative procedures, SOPs, etc. These procedures are recommended to ensure that the snow removal strategy would coincide with any evacuation scheme that might be chosen.**

The NUREG cross reference has been revised to include Procedure OPIP 3.6.3 as a citation for element J.10.k.

*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

**It should be noted that one (1) RAC member felt that this element should be rated adequate (A).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
 Dated October 12, 1984

NUREG-0654
Element

Review Comment(s)

Rating

J.10.1

The presentation of time estimates for evacuation of various sectors in Appendix A, Table XV, page V-8 conforms with the preferred format for presenting the data and results for the following types of evacuation:

A

Conditions

| | <u>Normal</u> | <u>Adverse</u> |
|----------------------|---------------|----------------|
| Permanent population | x | x |
| Transient population | x | x |
| General population | x | x |
| Special population | x | x |

The table as presented is adequate.

As recommended in Appendix 4 of NUREG-0654, the time for confirmation of evacuation should be estimated and included in Table XV of Appendix A.

J.10.m

According to page 3.1-2 and page 4.1-2, the LERO Director of Local Response, in conjunction with the Radiation Health Coordinator, formulate the protective action decisions.

A

A Nuclear Engineer has been added to the LERO emergency response staff (see comment for element J.8, above). The Nuclear Engineer is stationed at the local EOC to evaluate plant status as part of the development of protective action recommendations. Coordinated response with the evacuation coordinator has been integrated into the decision-making process (see page 3.6-4 of the plan).

The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.6.1 as a citation for element J.10.m.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 43 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| J.11 | <p>Section 3.6, page 3.6-8a of the plan states that control of the ingestion exposure pathway EPZ will be directed by the LERO Health Services Coordinator. In accordance with the draft Federal Radiological Emergency Response Plan (FRERP), the federal government will assist LERO in developing and implementing protective actions with respect to impoundment, decontamination, processing, decay, product diversion, and preservation. Under the aegis of FRERP, USDA, DOE and HHS will assist LERO in developing and implementing the ingestion pathway protective actions.</p> <p>Procedure OPIP 3.6.6 contains ingestion pathway procedures, PAGs, and agricultural resource information such as listings of dairy farms, processing plants, duck growers, hog farms, vegetable and fruit growers, potato processing plants in New York and processing plants, dairy farms in Connecticut.</p> <p>Since no portion of the State of Rhode Island is within 50 miles of SNPS, the issue of provisions for ingestion pathway planning with Rhode Island is not a concern (see Figure 1.1.1).</p> <p>The plan is now specific in imposing ingestion pathway protective procedures for food, milk, water and livestock feed control. This includes USDA support under FRERP. Within New York State, the primary means of food control would be voluntary, based on radio messages (see Plan, Chapter 3, Section 3.6, page 3.6-8 and page 3.6-8a) and telephone calls to food producers, processors and distributors indicating that LILCO will compensate for food that is not salvagable (see Procedure OPIP 3.6.6, Section 5.4.2.3 and Attachment 19). However, it may take some time for the Federal government to get involved. There is also an error on page 3.6.8a which states that, "aid may be requested from the USDA and EPA." FDA is the Federal Agency that should be called, not EPA.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 44 of 59

NURFC-0654
Element

Review Comment(s)

Rating

J.11
(Cont'd)

Maps are now referenced which include all of the 50-mile ingestion pathway EPZ (see Procedure OPIP 3.6.6, page 1b of 50, page 5.1.12d; and page 4 of 50, 5.7). The plan now includes references to tables listing dairies, farms and food processing plants. Maps of 50-mile EPZ are housed at the local EOC (see Plan, page 3.6-8a Procedure OPIP 3.6.6, Sections 5.1.1.2, 5.1.2.3, 5.1.3, 5.4, 5.4.1, 5.7, 5.8 and 7.0).

J.12

The plan (see page 4.2-4) and Procedures (see OPIP 3.9.2, Section 5.3.1) have been revised to specify that evacuee monitoring and decontamination equipment will be stored at the three primary relocation centers at BOCES, Islip; St. Joseph's College, Patchogue; and SUNY, Farmingdale.

A

The plan describes how the maximum number of evacuees would be monitored within 12 hours (see Chapter 3, Section 3.9, B, page 3.9-5, lines 30-48). However, the plan appears to be slightly inconsistent. Page 3.9-5 specifies 81 monitoring personnel, while Figure 2.1.1 specifies 90 monitoring personnel (30 at each of the three primary relocation centers). This inconsistency should be reconciled.

Procedure OPIP 3.9.2 has been revised to avoid the possibility of a contaminated person entering the relocation center. "Clean" and "contaminated" tags have been added to Procedure OPIP 3.9.2 (see Attachments 5 and 6) to ensure that potentially contaminated persons will be kept separate from monitored individuals who have been admitted to the relocation center for mass care. Individuals found to be clean following monitoring and decontamination will be issued a "clean" tag and be required to sign out before being directed to the mass care facilities operated by the American Red Cross at the Relocation Centers.

The American Red Cross is responsible for opening and operating the predesignated relocation centers (Chapter 2, Section 2.2, page 2.2-2), and they will supply the registration forms. Is a copy of the American Red Cross ARC 3050 available for examination by the RAC?

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 45 of 59

NUREG-0654
Element

Review Comment(s)

Rating

J.12
(Cont'd)

A sample evacuee registration form should be provided in the plan. All individuals who have been monitored, whether "clean" or "contaminated" need to have the monitoring survey documented as a legal precaution. The logs (Attachment 8) are incomplete in that they do not provide for time/date of survey, the identification of the monitor, and the survey results (i.e., maximum count rate) to be included on the evacuee registration form (see Procedure OPIP 3.9.2, Section 5.1.2 and 5.4.1).

Procedure OPIP 3.9.2 has been revised regarding non-contaminated persons (Section 5.9), and the storage of monitoring records (Section 5.1.7). All completed monitoring and decontamination forms will be collected at the relocation centers by the Decontamination Leader and delivered to the EOC for permanent storage.

The NUREG-0654 cross-reference has been revised to include Procedure 4.2.1 as a citation for element J.12.

K.

Radiological Exposure Control

K.3.a

Page 3.9-2 of the plan states that all emergency response personnel will be issued self-reading pocket dosimeters and TLDs. The LERO Dosimetry Coordinator is responsible for maintaining exposure control records on a 24-hour per day basis.

A

The plan has been revised to clarify that the dosimeters will be zeroed at the staging areas, and that the chargers will not be taken into the field (Chapter 3, Section 3.9, page 3.9-2, lines 6-12).

The following changes should be made to the plan:

- The Record Keeper charges and distributes dosimeters, not calibrates and distributes them at the time of an emergency (see Procedure OPIP 3.9.1, Section 5.2.2, page 2).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 46 of 59

NUREG-0654
Element

Review Comment(s)

Rating

K.3.a
(Cont'd)

- The "CAUTION" at the bottom of the page appears to contradict the exposure limits indicated in earlier portions of this procedure and in previous procedures (e.g., OPIP 3.6.3, Section 5.4.10, Section 5.5.9, etc.), in that the "CAUTION" recalls workers at exposures above 200 mR, whereas, the previous guidance had been 1.0 rem per day or 3.5 R total. The "CAUTION" should direct the workers to closely monitor the 0-5 R dosimeter if the 0-200 mR dosimeter is off-scale (see Procedure OPIP 3.9.1, Attachment 6, Section 5.2.1).

K.3.b

Page 3.9-2 of the plan states that emergency workers inside affected areas are instructed to take dosimeter readings at 15-minute intervals. Emergency Worker Daily Dose and Permanent Dose Record forms are contained in Section 3.9 and also in Procedure OPIP 3.9.1. Section 3.9.A, page 3.9-3 of the plan states that emergency worker dose records will be maintained at the local EOC.

A

K.4

The LILCO Transition Plan (Revision 4) provides for emergency workers to be trained to inform their immediate supervisor if the reading on their low range dosimeter goes beyond the 200 mR that it will register. Pages 3.9-2 and 3 of the plan state that the Director of Local Response, as advised by the Radiation Health Coordinator, is responsible for authorizing exposures in excess of the EPA General Public PAGs.

A

Page 3.9-3 lines 18-19 give an exposure guideline for hands and forearms of 200 R for lifesaving activities. This should be omitted, since such exposures apply to onsite rather than offsite environmental exposures.

K.5.a

Tables 3.9.1 and 3.9.2 specify action levels for determining the need for decontamination.

A

The plan has been revised to use CPM for all "probe shield open" readings (see Table 3.9.1).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 47 of 59

NUREG-0654
Element

Review Comment(s)

Rating

K.5.a
(Cont'd)

Action levels for determining the need for decontaminating individuals and property were adequately specified. Procedure OPIP 3.9.2 and Table 3.9.1 are now consistent.

Reference to Regulation Guide 1.86 has been removed, and Table 3.9.2 has been deleted from the plan. Re-entry decisions are appropriately based on EPA's PAGs.

K.5.b

Page 3.9-4, line 39 and page 4.3-2, line 5 of the plan and Procedure OPIP 3.9.2 (Section 5.8.1-C) state that any emergency worker with thyroid contamination resulting in readings in excess of .13 mR or 150 CPM, will be sent to a designated hospital for further medical treatment. The plan consistently uses 0.13 mR or 150 CPM as the thyroid contamination level.

A

The statement that alpha radiation will be measured has been appropriately deleted from the procedures (see Procedure OPIP 3.9.2, Section 5.5, 5.5.2,a).

Procedure OPIP 3.9.2 has been revised to include procedures for dealing with contaminated waste. (Section 5.0, 5.1.7 - 5.1.9).

The decontamination equipment list is contained in Procedure OPIP 5.3.1 and in the plan (see Chapter 4, Section 4.2, D, pages 4.2-3 and 4.2-4).

First-aid kits have been placed at the Emergency Worker Decontamination Facility (EOC) and at the primary Relocation Centers (Chapter 4, Section 4.3, A, page 4.3-1, lines 18-22 and page 4.4-3, lines 13-20).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 48 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|--|---------------|
| L. | <u>Medical and Public Health Support</u> | |
| L.1 | <p>Provisions are adequately described for hospital and medical services with the capability for handling contaminated or exposed persons. Central Suffolk Hospital is designated as the primary support hospital for the treatment of contaminated LERO emergency workers (see page 2.2-2a). According to Section 3.7, contaminated injured members of the public can be treated by accredited hospitals on Long Island that can treat radiologically contaminated individuals. These hospitals (of which Central Suffolk is one) are listed in Procedure OPIP 4.2.2.</p> <p>The agreement with Central Suffolk Hospital (see Appendix B, App-B-75A) to "treat injured or injured and radiologically contaminated individuals from the Shoreham Station" and the list of regional medical service facilities capable of treating emergency workers and/or the general public are adequate to satisfy this planning element.</p> | A |
| L.3 | <p>The agreement with Central Suffolk Hospital and the list of regional medical service facilities capable of treating radiologically contaminated individuals are adequate to satisfy this planning element.</p> <p>A new list of hospitals capable of treating contaminated/injured individuals, with the number of beds available, has been incorporated in Procedure OPIP 4.2.2, Attachment 1, pages 1-7).</p> <p>The plan has been revised to include in Section 3.7, reference to the list of hospitals capable of treating contaminated/injured individuals contained in Procedure OPIP 4.2.2, Attachment 1.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated EAC Review
Dated October 12, 1984

Page 4^o of 59

NUREG-0654

Element

Review Comment(s)

Rating

L.4

Page 3.7-1 of the plan states that the LERO Ambulance Coordinator will coordinate the services of trained emergency medical technicians, ambulances and rescue vehicles.

A

The list of ambulance companies with which LERO has agreement to supply resources are contained in Procedure OPIP 4.2.2 (see Attachment 2).

The NUREG-0654 cross-reference has been revised to include Procedure OPIP 4.2.2 as a citation for element L.4.

M.

Recovery and Reentry Planning and Postaccident Operations

M.1

Section 3.10, pages 3.10-1 and 2 and Section 3.11, pages 3.11-1 and 2 of the plan and Procedure OPIP 3.10.1 discuss Re-entry and Recovery. Procedure OPIP 3.10.1 provides for participation of the following agencies/organizations on the Recovery Action Committee if they are available:

A

- FEMA representative
- DOE representative
- EPA representative
- State representative
- County representative

General plans for recovery and reentry have been developed which take into account the engineering evaluation of plant conditions as well as radiological conditions (see comments for elements I.8, J.10.m, and O.4.b). The plan has been revised to include a Nuclear Engineer who will review plant conditions (see Procedure OPIP 3.10.1, Section 5.0, 5.11, g). This individual is assigned as a member of the Recovery Action Committee and is responsible for emergency status evaluation of the plant.

Reference to Reg. Guide 1.86 has been removed from the plan as it is not related to recovery from an emergency at SNPS.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 50 of 59

NUREG-0654

Element

Review Comment(s)

Rating

M.1
(Cont'd)

The plan has been revised to delete evacuation as a prerequisite for recovery (see Procedure OPIP 3.10.1, Section 4.1). Revision of the procedure has not been completed. The revised plan does not consider procedures for recovery when sheltering may have been recommended with a release (see Procedure OPIP 3.10.1, Sections 5.4.1, 5.4.2 and 5.4.3).

EPA is listed as the agency responsible for post-emergency phase activities (see plan, Chapter 3, Section 3.11, page 3.11-1, lines 34-39; also, Procedure OPIP 3.10.1, Section 5.3, 5.3.3).

M.3

The LERO Director of Local Response is responsible for instructing all Recovery Action Committee coordinators to notify members of the response organization when recovery operations have been initiated (see Procedure OPIP 3.10.1, Sections 5.3.4 and 5.3.6).

A

M.4

The referenced section of the plan provides for the completion of radiation field surveys to determine whether contamination levels in an evacuated area are within acceptable limits for reentry of the public into formerly contaminated areas.

A

The plan has been revised to include a procedure for calculation of total population dose, and is referenced in Chapter 3, Section 3.10, b, e, page 3.10-2. However, the dose reduction factors for sheltering should be reevaluated, since the bulk of the available data indicates that for most buildings the benefit of sheltering decreases after two hours due to intrusion of outside air.

LLCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 51 of 59

NUREG-0654
Element

Review Comment(s)

Rating

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|---|---------------|
| N. | <u>Exercises and Drills</u> | |
| N.1.a | <p>The referenced section of the plan describes the purpose, scope, frequency and procedures for exercises. The plan states that an exercise shall simulate an emergency that results in offsite radiological releases which would require the overall emergency response capabilities of SNPS, and LERO.</p> <p>Accident Assessment and Evaluation, and Emergency Response Facilities, should be added to the list on page 5.2-3, lines 28-35, of capabilities to be tested in exercises (also see comment for element N.2.d).</p> <p>FEMA has been deleted from line 15 on page 5.2-3 since FEMA does not test its response capability in every exercise.</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p> | A* |
| N.1.b | <p>The plan contains no provision for the mobilization of State and local personnel and resources in order to verify responses during exercises. However, the plan does establish the means for mobilizing LERO personnel and resources that would be adequate to verify the capability to respond to an accident scenario requiring response.</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p> | A* |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 52 of 59

| <u>NUREG-0654</u> <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-------------------------------------|--|---------------|
| N.2.a | <p>The plan adequately addresses the testing of communication systems with the following:</p> <ul style="list-style-type: none">● Federal emergency response organizations and states within the ingestion pathway - quarterly,● The nuclear facility (SNPS) -- annually,● The State and local (LERO) EOCs -- annually, and● Local (LERO) radiological monitoring team -- annually. <p>The plan provides for drills of communication with the State and local EOCs.</p> <p>The NUREG-0654 cross-reference has been revised to include Procedure OPIP 3.4.1 as a citation for element N.2.a.</p> | A |
| N.2.c | <p>Page 5.2-2a of the plan and Procedure OPIP 5.1.1, Section 5.2.2.1c adequately provide for a Medical Drill to be conducted annually in conjunction with the annual exercise.</p> | A |
| N.2.d | <p>The referenced section of the plan provides for radiological monitoring drills.</p> <p>The plan has been revised to state that the DOE-RAP Team will participate annually in a practice exercise and in the FEMA/NRC observed exercise. This will be in addition to their separate drill and exercise program associated with Brookhaven National Laboratory (see Chapter 5, Section 5.2, b, page 5.2-3, lines 19-23).</p> | A |
| N.2.e.(1) | <p>Page 5.2-2a of the plan and Procedure OPIP 5.1.1, Section 5.2.2.1.d. adequately provide for health physics drills to be conducted semi-annually.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 53 of 59

NUREG-0654

Element

Review Comment(s)

Rating

N.3.a-f

The referenced section of the plan adequately provides for exercise scenarios to include the following:

A

- The basic objectives;
- The date(s), time period, place(s) and participating organizations;
- The simulated events;
- A time schedule for real and simulated initiating events;
- A narrative summary describing the conduct of exercises or drills;
- Arrangements for scenario material to be provided to official observers.

Provisions for, and the use of, protective clothing should be added to Section 5.2 page 5.2-1, line 12.

N.4

Section 5.2, pages 5.2-1 and 5.2-4, lines 4-6, 14 and 15 of the plan establishes that the LILCO Emergency Planning Coordinator (EPC) is responsible for conducting exercises that will be critiqued by observers from Federal, State and local governments.

A

N.5

Procedure OPIP 5.1.1, Sections 5.2.6 and 5.2.7 adequately provide for LERO to evaluate observer and participant comments and implement corrective actions. The LILCO Emergency Planning Coordinator is responsible for incorporating plan changes indicated as a result of the drills and annual exercise critiques.

A

Procedure OPIP 5.1.1, Section 5.2.6.5 makes the following provision:

DILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 54 of 59

NUREG-0654

Element

Review Comment(s)

Rating

N.5
(Cont'd)

"The EPC (Emergency Planning Coordinator) shall collect and evaluate all exercise/drill records including checklists, logs, LERO Observation Sheets, survey reports, etc. from LERO, federal, state, and local observers and keep them on file." (Emphasis added)

This provision is beyond the scope of FEMA's policy on the Availability of Records under the Freedom of Information Act Relating to State and Local Radiological Emergency Plans and Preparedness Program per the June 30, 1983 memorandum for Regional Directors from James L. Holton, Director, Office of Public Affairs, and George Jett, General Counsel which states:

The critiques of individual members of the Regional Assistance Committee (RAC) evaluating the effectiveness of a Radiological Emergency Preparedness exercise qualify for withholding under the Freedom of Information Act pursuant to 5 U.S.C. 552(b)(5).

According to policy guidance from the Department of Justice, the purpose of the (b)(5) exemption is to assure:

...presidents, agency heads, and other decisionmakers that they can safely welcome a full spectrum of candid expressions from their staffs and/or peers, because they will be free to accept or reject all such input on its apparent intrinsic merit, not on whether a particular staff memorandum may make the official's action look better or worse, especially if the action is controversial or later proves unsuccessful... .

Federal Observers should be deleted from Section 5.2.6.5 of Procedure OPIP 5.1.1. However, the statement should be added to Procedure OPIP 5.1.1 to read that Federal comments for the exercise are provided by FEMA in the post-exercise assessment which summarizes the evaluation of the Federal Observers.

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 55 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|---|---------------|
| O. | <u>Radiological Emergency Response Training</u> | |
| O.1 | <p>Section 5.1, pages 5.1-3 through 5.1-5 of the plan and the LERO Training Matrix (Figure 5.1.1) provide emergency response training for LERO personnel through a training program consisting of 21 modules. Radiological emergency response training is included. Also, tapping the Federal sector, LILCO would avail itself of approximately 12 courses, some given by FEMA, some by NRC, and some by EPA. The Red Cross would also be utilized, providing six training courses.</p> <p>Procedure OPIP 5.1.1, Section 5.1.5 provides that the records maintained by LILCO will show the names and emergency position of individuals trained, the instructor's name, and the dates on which they received training.</p> | A |
| O.1.b | <p>Procedure OPIP 5.1.1, Section 5.1.2 states that Emergency response Training will be offered to all members of LERO support organizations, such as the U.S. Coast Guard and ambulance personnel.</p> <p>The plan has been revised to specify that LILCO will offer training in dosimetry and radiation fundamentals to all local law enforcement agencies, snow removal authorities, and fire and rescue departments within the 10-mile EPZ which are expected to carry out their normal functions during a radiological emergency at SNPS (see also comment for element A.1.b, above).</p> | A |
| O.4 | <p>The referenced section of the plan establishes a training program for emergency response personnel which is keyed to specific emergency response training topics. The following subelements of this planning criteria have been reviewed as follows:</p> <p>O.4.a Directors or coordinators who are LILCO employees. However, clarification is needed between the plan and LERO Training Matrix on identification and content of Module 15.</p> | A |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 56 of 59

| <u>NUREG-0654</u> <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|-------------------------------------|--|---------------|
| O.4 (Cont'd) | O.4.b Training is provided for accident assessment personnel, both engineering and radiological health. The plan has been revised to specify that personnel designated to fill the positions of Radiation Health Coordinator and Nuclear Engineer are required to be technically qualified in their fields of responsibility and will receive training in LERO procedures. Both positions listed on the LERO Training Matrix (see Figure 5.2.1, also see Plan, Chapter 5, Section 5.1, page 5.1-7, lines 2-8). | A |
| | O.4.c Radiological monitoring teams and radiological analysis personnel. | A |
| | O.4.d Police, security, and fire fighting personnel; see comment for element 0.1.b, above. | A |
| | O.4.f First aid and rescue personnel | A |
| | O.4.g Local support services personnel | A |
| | O.4.h Medical support personnel | A |
| | O.4.j Personnel responsible for transmission of emergency information and instructions. | A |
| O.5 | Chapter 5, Section 5.1 of the plan, Training, states that LILCO will provide for periodic retraining on at least an annual basis for personnel with emergency response responsibilities. | A |
| P. | <u>Responsibility for the Planning Effort</u> | |
| P.1 | The referenced section of the plan and implementing procedures provide for the training of LERO personnel who are responsible for the planning effort. | A* |

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 57 of 59

NUREG-0654

| <u>Element</u> | <u>Review Comment(s)</u> | <u>Rating</u> |
|----------------|---|---------------|
| P.2 | The LILCO Emergency Planning Coordinator (EPC) is responsible for the administration of the LILCO Transition Plan (all revisions). | A* |
| P.3 | The LILCO EPC is responsible for conducting an annual review and update of the LILCO Transition Plan including procedures and letters of agreement. | A* |
| P.4 | The LILCO Emergency Planning Coordinator is responsible for incorporating plan and procedure changes resulting from exercises and assigning the responsibility for implementing corrective actions. | A* |

With the exception of the American Red Cross and the relocation centers, various agreements necessary to implement the LILCO Transition Plan are included in the plan and will be updated annually or upon revision of the plan (see LILCO Summary of Responses to the Consolidated RAC Review for Revision 3, (page 3 of 3). At least one letter of agreement (i.e., with Teledyne Isotopes) has expired and needs to be updated (see Appendix E, page APP-B-74).

*These elements are adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 58 of 59

NUREG-0654
Element

Review Comment(s)

Rating

P.5

The LILCO EPC is responsible for distributing the LILCO Transition Plan and approved changes to the organizations and appropriate individuals responsible for their implementation. Pages for revisions 1, 2, 3, and 4 do not carry revision dates. Effective revision dates should be added to the list of effective page changes that are to be transmitted to individual users of the plan. Section 5.1.1 of Procedure OPIP 5.4.1 specifies that the LERO Emergency Planning Coordinator or designee will date-stamp the plan change documents and the transmittal forms sent with these documents.

A*

*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

P.6

Section 1.4, pages 1.4-1 and 1.4-2, and Attachment 1.4.2, contain the required list of supporting documents.

A

P.7

Appendix C to the plan lists by title, the procedure required to implement the plan.

A

Reference to the following procedure could not be located in the narrative sections of the plan.

- 1.1.1 Offsite Preparedness Implementing Procedure Development

LILCO Transition Plan for Shoreham - Revision 4
Consolidated RAC Review
Dated October 12, 1984

Page 59 of 59

NUREG-0654

Element

Review Comment(s)

Rating

P.8

The plan contains a specific Table of Contents, and is cross-referenced to NUREG-0654 criteria.

A

The NUREG-0654 cross-reference has been revised as requested by the RAC review for Revision 3 of the plan. However, element C.2.a is missing from page xiii of cross-reference.

P.10

Section 5.4, page 5.4-2 of the plan states that the telephone number lists will be updated on a quarterly basis, and more frequently, if necessary. Also, Procedure OPIP 5.4-1, Section 5.4.4 calls for telephone numbers in emergency procedures to be updated quarterly.

A

ATTACHMENT 2

CONCERNS PERTAINING TO LERO'S LEGAL AUTHORITY IDENTIFIED DURING RAC REVIEW OF LILCO TRANSITION PLAN FOR SHOREHAM REVISIONS 3 AND 4

February 10, 1984 and October 12, 1984

Below are the legal concerns identified during the RAC review of the LILCO Transition Plan for Shoreham - Revisions 3 and 4. For easy reference, each NUREG-0654 element affected by the legal concern(s) is restated, followed by the RAC comments.

A.1.a Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones (see Appendix 5).

With neither State nor local support or participation in the emergency planning process, the following legal authority concerns have been identified.

- command and control responsibilities
- coordination with local and State authorities including law enforcement agencies, fire departments, and snow removal agencies
- coordination with contiguous State and local governments
- LERO's ability to seek a declaration of a state of emergency and to request State and Federal assistance.
- arrangements for agreements with emergency response organizations and/or individuals
- responsibility for alerting and notification of the public.

A.1.d Each organization shall identify a specific individual by title who shall be in charge of the emergency response.

The plan assigns responsibility for "protecting the health and safety of residents and transients within the Emergency Planning Zones (EPZs) defined in this plan" (see page 2.1-1, lines 37-41), to the LERO Director of Local Response. At this time, the LERO Director of Local Response has the responsibility for "decision making and strategic controls," and responsibility to "decide upon the major

responses to be made" (see page 3.1-1, lines 15-17). The concern is whether or not LERO has the authority to implement decisions that are made.

- A.2.a** Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: command and control, alerting and notification, communications, public information, accident assessment, public health, and sanitation, social services, fire and rescue, traffic control, emergency medical services, law enforcement, transportation, protective response (including authority to request Federal assistance and to initiate other protective actions), and radiological exposure control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other (see section B for licensee).

The lack of participation by New York State and Suffolk County governments in radiological emergency planning for Shoreham, distinguishes the LILCO Transition Plan as a private plan rather than a government plan. NUREG-0654 requires that the responsibility for Fire, Rescue, and Law Enforcement should be specified in the plan. The discussion on page 1.4-2b (Rev. 4) states that LILCO expects that Suffolk County personnel will continue to perform their normal functions (police action, fire safety, and snow removal) in accordance with referenced sections of the Suffolk County Charter. This is also stated on page 2.2-4g of the plan. The utility's expectation remains a concern for the following reasons:

- The county and State have refused to take part in the pre-emergency planning programs, and
- A radiological emergency is not a normal condition and no assumption can be made as to how an organization will respond without preparatory planning.

See also comments for A.1.a.

- A.2.b** Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.

Attachment 1.4.1 in the Plan refers to legal authority under 10 CFR 50.47 (c)(1).

The utility has developed LERO, comprised of utility, Federal and private individuals. If New York State and Suffolk County implement an emergency plan, LERO would follow their lead (see Section 1.4, pages 1.4-1, 1.4.2; also, attachments 1.4.1 and 1.4.2).

The authority of LERO to implement this plan under NRC codes and regulations and new York State Executive Law, as well as the issue of LERO's police power authority, has not been resolved.

- 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. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

During the RAC review, the following legal concerns were identified:

- LERO's authority to enter into agreements and/or contracts with emergency response organizations identified in the plan.
- The plan acknowledges county responsibility for snow removal, fire safety and police actions (see the Suffolk County Charter, referenced Page 1.4-2b of the plan). Since the county and State have declined to participate in radiological emergency planning for Shoreham, their normal response during an emergency remains a concern.

- C.1 The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following.

- C.1.a Specific persons by title authorized to request federal assistance, see A.1.d, A.2.a.

The plan provides for the LERO Director of Local Response to "Request the Governor to ask the President to declare an Emergency or Disaster". The legal basis for this procedure has not been identified in the plan.

- 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.

For comments - see A.3.

- E.5 State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow-up messages received from the licensee including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

LERO has established a network of Long Island radio stations for disseminating emergency information to the public. LERO's authority to disseminate emergency information to the public without the involvement of State and/or local government officials remains a concern.

- E.6 Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone (see Appendix 3). It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

The official EBS system authorized by the Federal Communication Commission (FCC) is used by government officials to disseminate emergency information to the public. LERO's legal authority to activate the alert and notification system without State and/or local government participation remains a concern.

- F.3 Each organization shall conduct periodic testing of the entire emergency communications system (see evaluation criteria H.10, N.2.a, and Appendix 3).

No statement that State and local governments will participate in communication drills with LERO could be located in the plan.

- G.3.a Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

The plan does not specify the level of involvement in the development and/or review of EBS and news releases.

For comments - see E.5.

- H.4 Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

Without a State Site Specific Plan for the SNPS, there are no procedures specified for the activation and staffing of the State EOC in the event of a radiological emergency at the Shoreham site. Therefore, provision for the notification and mobilization of personnel to coordinate the State's interface with the LERO response remains a concern.

- J.10 The organization's plans to implement protective measures for the plume exposure pathway shall include:

- a. Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan);

The Evacuation Plan (Appendix A Section I - Preface pages I-1 to I-2) is made up of two plans -- a study performed by Suffolk County as part of an agreement with LILCO (9/21/81), a study performed by KLD Associates under an agreement with LILCO to develop an evacuation plan (12/30/81). LILCO has integrated the two studies into Appendix A.

Since Suffolk County is not participating in the offsite emergency planning processes, a concern remains as to whether the data developed by Suffolk County under contractual agreement on emergency response planning executed in 1981, are still applicable.

- c. Means for notifying all segments of the transient and resident population;

As noted in analysis comments E.5 and E.6, LERO's legal authority to activate the alert and notification system and to disseminate emergency information to the public without the involvement of the State and/or local government remains a concern.

- f. State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the predetermined conditions under which such drugs may be used by offsite emergency workers;

The authority of the Health Services Coordinator to authorize the use of KI for other LERO emergency workers who are not LILCO employees is of concern, since the State Health Department would not be involved in the decision making regarding the use of KI by emergency workers.

- j. Control of access to evacuated areas and organization responsibilities for such control;

Since the staff assigned to Traffic Control are LILCO employees, the ability to accomplish this effort under the authority of 10 CFR 50.47 remains a concern.

Assigning access control duties to LILCO employees includes:

- setting-up and controlling roadblocks
- dealing with evacuation, etc., remains a concern

- k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures;

According to page 2.2-4 of the plan, it is anticipated that snow removal will be provided by local organizations in their normal fashion during an emergency.

LERO's coordination with local agencies responsible for snow removal needs to be addressed to ensure that snow removal is in accordance with the evacuation scheme in case of a radiological emergency. In addition, LERO's authority to remove impediments to evacuation remains a concern.

- N.1.a An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

Since New York State and Suffolk County are not participating in the planning process, the testing of integrated capability of the offsite authority(s) remains a concern.

N.1.b An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide a critique of the annual exercise by Federal and State observers/evaluators. The scenario should be carried from year to year such that all major elements of the plans and preparedness organizations are tested within a five-year period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannounced.

Since New York State and Suffolk County are not participating in the planning process, mobilization of their personnel and resources during an exercise remains a concern.

- P.1** Each organization shall provide for the training of individuals responsible for the planning effort.
- P.2** Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.
- P.3** Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.
- P.4** Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.
- P.5** The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

NUREC-0354 mandates an integrated approach to the development of offsite radiological emergency plans by States, localities, and licensees.

Since New York State and Suffolk County are not participating in the development, updating of and training for a radiological emergency plan for Shoreham, the lack of an integrated approach to offsite radiological emergency preparedness remains a concern.

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20534

October 17, 1984

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FEMA-REGION II

Mr. Roger B. Kowieski
Chairman
Regional Assistance Committee
Federal Emergency Management Agency Region II
26 Federal Plaza
New York, NY 10278

Dear Mr. Kowieski:

This is response to your October 4, 1984 letter wherein you request a clarification concerning whether private organizations have the legal authority to activate the Emergency Broadcast System (EBS).

The FCC rules Subpart G, Section 73.935(a) Emergency Broadcast System, (enclosed) specified that 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. In other words, it is up to each individual station as to whether they will activate the EBS for a State or local emergency. Their participation is entirely voluntary.

However, most areas of the country have a plan under which broadcast stations have agreed to activate the EBS under certain specified conditions at the request of authorized officials.

Development of these plans was initiated in 1976, when the Defense Civil Preparedness Agency (now FEMA) entered into an Agreement to expand the use of the EBS from a National level system to one for use at the State and local level. This Agreement (enclosed) was updated in 1982. It was also the intent of the three agencies to accomplish this expansion in an orderly fashion. Therefore, as part of the program, a model local EBS plan was developed for Parkersburg, West Virginia that included: authentication procedures, a list of officials authorized to activate the local EBS, and a list showing local communications facilities, etc. This plan served as a basis to develop similar plans in other communities. Presently, the FCC has reviewed and approved 431 local EBS plans with 144 more being in the draft stage.

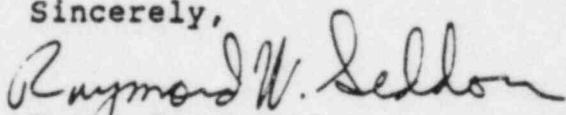
Draft local EBS plans (enclosed) for the Nassau and Suffolk Counties of New York have never been finalized. However, if the Long Island Lighting Company and several local radio stations have developed a plan of their own for disseminating information to the public via EBS, the FCC would prefer to review the plan to insure that it conforms with the FCC EBS rules, and that it enhances the National Level EBS.

Of the over 5,400 EBS activation reports that the FCC has received since 1976, some have been initiated by stations themselves. In other words, the stations felt that there existed an emergency situation that warranted immediate activation of the local EBS and this was done without verification from local officials.

For your information Section 73.1250 of the FCC rules allows AM radio stations to stay on the air with their full daytime facilities if, in the broadcasters mind, the situation threatens life or property and no other broadcast station is adequately providing this service. 73.1250 operation can be accomplished without a local official's requests.

Thank you for your inquiry. If you need additional information, regarding this or any other matter please advise me.

Sincerely,



Raymond W. Seddon
Chief, Emergency Communications
Division

Enclosures

RELATED CORRESPONDENCE

Enclosure 3



LONG ISLAND LIGHTING COMPANY

SHOREHAM NUCLEAR POWER STATION

P.O. BOX 618, NORTH COUNTRY ROAD • WADING RIVER, N.Y. 11792

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JOHN D. LEONARD, JR.
VICE PRESIDENT - NUCLEAR OPERATIONS

September 25, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Supplemental Information On Relocation Centers
Shoreham Nuclear Power Station - Unit 1
Docket No. 50-322

Dear Mr. Denton:

On May 26, 1983 the Shoreham Nuclear Power Station Local Offsite Radiological Emergency Response Plan was submitted as part of the Atomic and Safety Licensing Board Docket No. 50-322.

On June 29, 1984 we forwarded Revision 4 to the above referenced plan. That revision responded to comments by the Federal Emergency Management Agency (FEMA) Regional Assistance Committee (RAC) in their report dated March 15, 1984. Revision 4 referenced the use of public relocation centers located in Suffolk County which would be operated by the Suffolk County Chapter of the American Red Cross.

On July 31, 1984 we submitted testimony before the Atomic Safety and Licensing Board - Docket No. 50-322-OL-3 (Emergency Planning Proceeding) which modified Revision 4 as regards public relocation centers. The following paragraphs describe the concept of operations which was presented in this testimony. LILCO commits to incorporating this and all pertinent supporting details in a future revision of the Plan and Procedures.

A reception center (or centers) will be listed in the LILCO Plan and public information materials. This center (or centers) will be in Nassau County, and will be able to accommodate up to 32,000 evacuees. LERO will provide monitoring and decontamination services there, and provide evacuees with "clean tags". The Red Cross then will direct these evacuees to Red Cross shelters throughout Nassau County in accordance with the attached letter of agreement dated July 25, 1984. As the letter and its attachment indicate, these shelters can hold up to 48,000 evacuees. Since they are all in Nassau County, they are located more than 20 miles from the Shoreham Plant.

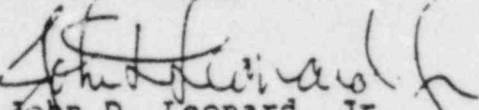
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LILCO will soon enter into a written agreement (or agreements) with the owner (or owners) of the reception center (or centers) which will confirm the above. The Nassau County Chapter of the American Red Cross will enter into a separate agreement (or agreements) with the owner (or owners).

Should you have any questions, please contact this office.

Very truly yours,



John D. Leonard, Jr.
Vice President - Nuclear Operations

JAW:ck

Attachment

cc: C. Petrone w/attachment
P. Eselgroth "
Holders of the SNPS Local Offsite Radiological Emergency
Response Plan w/attachment



American Red Cross

Nassau County Chapter
264 Old Country Road
Mineola, N.Y. 11501
(516) 747-3500

July 25, 1984

Mrs. Elaine D. Robinson
Long Island Lighting Company
100 East Old Country Road
Hicksville, N.Y. 11801

Re: Letter of Agreement Between
LILCO and the American Red Cross

Dear Mrs. Robinson:

This letter confirms our recent discussions regarding the role of the American Red Cross, as determined by Charter of the U. S. Congress, during an emergency at the Shoreham Nuclear Power Station. Upon notification of an emergency at Shoreham the Red Cross will set up emergency centers at a predesignated facility (or facilities) to be listed in the LILCO Transition Plan. The Red Cross will work with LILCO to identify the facility or facilities to be designated; any facility chosen will be 20 miles or more from the Shoreham site. The Red Cross will staff the designated facilities and will, if necessary, dispatch evacuees from these to additional facilities for shelter. It is agreed that the Local Emergency Response Organization (LERO) will provide monitoring and, if necessary, decontamination at the designated facilities.

In addition, there exist agreements between the Nassau County Chapter of the American Red Cross and the facilities named on the attached list, allowing the Red Cross to use the facilities for shelter during an emergency. These facilities will be relied upon by the Red Cross to provide additional space as relocation centers in the event of a radiological emergency at Shoreham, and it is to these facilities that evacuees would be directed, if necessary from the designated facilities in the LILCO Plan. If the space in these facilities is needed during an emergency at Shoreham, the Red Cross would fulfill its usual emergency response functions at these facilities, including staffing them and providing supplies as needed. It is estimated that these facilities could hold up to 48,000 people. All facilities are 20 miles or more from the Shoreham Nuclear Power Station.



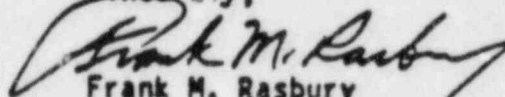
*The Nassau County Red Cross is also affiliated with Garden City Community Fund.
Great Neck United Community Fund Inc., Five Towns United Way,
Manhasset United Fund, Inc.*

Mrs. Elaine Robinson
Long Island Lighting Company
100 East Old Country Road
Hicksville, New York 11801

Page 2.

LILCO has agreed to provide any training the Red Cross may require. Red Cross personnel will participate as appropriate in emergency planning drills and exercises to assure a successful response in an actual emergency.

Sincerely,



Frank M. Rasbury
Executive Director

FMR:bbb

SHELTER INFORMATION 1982-1983

1. SAU COUNTY CHAPTER
 AMERICAN RED CROSS
 264 OLD COUNTRY ROAD
 MINEOLA, NY 11501

AGREEMENT & CAPACITY

| | | |
|--------------|---|--|
| 1975 500 | Baldwin Public Schools High School Drive Baldwin, New York 11510 | Contact: Sheldon Fuchs 223-8100 ext. 207/208 |
| 1978 1000 | Bellmore-Herrick Central H.S. Dist. 1691 Meadowbrook Road Herrick, N.Y. 11566 | Mr. Ellinger 623-8900 |
| 1978 900 | Carle Place Union Free School Carle Place, N.Y. 11514 | George Beyhl 334-1900 ext. 224 |
| 1978 500 | East Meadow Union Free School Dist. Carman Ave. East Meadow, New York 11554 | Clude Stringham Mr. Campo 794-7000 ext. 206 |
| 1978 1100 | East Rockaway Public Schools East Rockaway H.S. Green Ave. East Rockaway, N.Y. 11518 | Edward Lettore 599-7539 Robert Morse 599-7989 334-8020 |
| 1981 900 | East Williston School District 110 E. Williston Ave. East Williston, N.Y. 11596 | 334-4917 |
| 1978 1400 | Elmont Public Schools Elmont Road Elmont, N.Y. 11003 | 752-6512 849-7680 |
| 1975 1500 | Farmingdale Public Schools Van Cott & Grant Ave. Farmingdale, N.Y. 11735 | Mr. Russell 352-0768 |
| 1981 400 | Floral Park-Bellmore Union Free School Dist. 1 Poppy Place Floral Park, N.Y. 11001 | George Reynolds 394-1045 |
| 1981 600 | Franklin Square Union Free School Dist. Washington Street Franklin Square, N.Y. 11010 | Robert Swanson 623-5100 |
| 1976 2000 | Freeport Public Schools 235 North Ocean Ave. Freeport, N.Y. 11520 | Mr. Heinisch 848-7700 |
| 1980 1500 | Garden City Public Schools Garden City, N.Y. 11530 | Anthony Frizzuolo 672-3272 |
| 1978 1500 | Glen Cove Public Schools Dederis Lane Glen Cove, N.Y. 11542 | |

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|--------------|--|---|
| 1975 1400 | Emricks Public Schools Shelter Rock Road New Hyde Park, N.Y. 11040 | Contact: 741-7800 |
| 1981 2400 | Newlett High School 60 Everitt Ave. Newlett, N.Y. 11557 | Fred DePalma 374-5200 Gus Bruno |
| 1974 800 | Newlett-Woodmere Union Free School Dist. 1 Johnson Place Woodmere, N.Y. 11598 | Harry Richter 374-5200 ext. 213 |
| 1975 2400 | Hicksville Public Schools Division Ave. Hicksville, N.Y. 11801 | 733-2100 Kathleen Egan |
| 1980 400 | Island Park Schools Island Park, N.Y. 11558 | 432-8933 431-8100 |
| 1975 1400 | Island Trees Union Free School Dist. Owl Place & Conder Road Levittown, N.Y. 11756 | Mr. Fred Heist 731-4020 Stella Clark 731-7247 |
| 1975 300 | Lawrence Jr. H.S. Lawrence, N.Y. | Berton Terry 295-2700 ext. 283/253 |
| 1975 1400 | Leerst Valley Central School Leerst Valley, N.Y. 11560 | James McInnes Richard Smith 676-8430 |
| 1981 800 | Long Beach H.S. Lido Blvd. & Allevard Street Long Beach, N.Y. | William Selden 889-2410 Larry Bourger 889-2167 |
| 1974 1000 | Lynbrook Union Free School Dist. Maverly Ave. East Rockaway, N.Y. 11518 | Louis Fearall LI 3-4861 |
| 1978 100 | Masapoqua Grace Episcopal Church 4750 Merrick Road Masapoqua, N.Y. 11758 | Father John Johnson 798-1122 |
| 1975 1300 | Masapoqua High School 4925 Merrick Road Masapoqua, N.Y. 11758 | William A. Eldard 541-6600 |
| 1980 300 | Malverne U.F.O.D. Woodfield Road Rockville Centre, N.Y. 11570 | Lawrence Chapman 887-7733 |
| 1975 300 | Kanhsaset Public Schools Memorial Place Kanhsaset, N.Y. 11030 | Dr. Jean Hill 627-4400 Dr. Donald Grote 627-4400 |

| | | |
|--------------|--|---|
| 1978 100 | Mineola Town Hall Jericho Turnpike Mineola, N.Y. 11501 | Contact: Mayor Smith 747-2232 |
| 1978 1600 | Mineola Union Free School Dist. 200 Emory Road Mineola, N.Y. 11501 | 747-6700 |
| 1981 1000 | Nassau County B.O.C.E.S. Salisbury Center Valentines Rd. & The Plain Rd. Westbury, N.Y. 11590 | 997-8700 |
| 1975 1600 | No. Ballstere U.F.S.D. 2616 Martin Ave. No. Ballstere, N.Y. 11710 | 221-2200 |
| 1978 600 | North Merrick U.F.S.D. 1775 Old Mill Road No. Merrick, N.Y. 11566 | 379-4070 |
| 1980 500 | North Shore Schools Sea Cliff, N.Y. | 671-5500 |
| 1982 500 | Greenside Merle Ave. School Merle Ave. Greenside, N.Y. 11572 | 678-1200 |
| 1978 1200 | Oyster Bay-East Norwich School Dist. Oyster Bay, N.Y. 11771 | 922-3170 |
| 1981 1600 | Plainedge Public Schools Nickville Road Bethpage, N.Y. 11714 | Herman Blank 735-8100 ext. 1308 |
| 1978 800 | Plainville-Old Bethpage Central School Plainville, N.Y. 11803 | 938-9400 |
| 1978 2400 | Port Washington U.F.S.D. 27 Longview Road Port Washington, N.Y. 11050 | Harold Champol 886-2517 Francis Banta 883-4000 |
| 1978 400 | Roosevelt Public Schools 288 Nassau Road Roosevelt, N.Y. | 378-7302 |
| 1981 1400 | Roslyn Public Schools Levert Lane Roslyn, New York | 621-4900 |
| 1981 300 | St. Ignatius Rectory 129 Broadway Nicksville, N.Y. 11801 | Father Harter 931-0056 |

1978
1600
Seaford Union Free School Dist.
2147 Jackson Ave.
Seaford, N.Y. 11783

Edward Voorhees
CA 2-0700

328-4878

1978
500
Sovanhaka Central H.S. Dist.
555 Ridge Rd.
Kliment, N.Y. 11003

Joseph Singleton
921-5500

1975
900
Syosset Central School Dist.
Fall Lane
Syosset, N.Y. 11791

485-9004

1978
2300
Uniondale Public Schools
Goodrich Street
Uniondale, N.Y. 11553

Rev. George Cear
485-6363

1978
150
United Methodist Church
40 Washington Street
Hempstead, N.Y. 11550

George Hilton
WE 2-4345
WE 2-2977

825-8945

1978
100
United Methodist Church
192 Broadway
Bethpage, N.Y. 11714

1975
600
Valley Stream U.F.S.D.
Carson Ave.
Valley Stream, N.Y. 11580

Sam Glavin
483-3969

1980
400
Valley Stream U.F.S.D. #30
Valley Stream, N.Y. 11580

Klenned Webster
876-2016

1978
1600
Westbury U.F.S.D.
Jericho Tpsh. A Hitchcock Lane
Westbury, N.Y. 11590

Harry Erlow
409-8415

1975
1200
West Hempstead U.F.S.D.
450 Nassau Blvd.
W. Hempstead, N.Y. 11552

ANDREW R. STRAFKI
516 876 3146 Bus
516 433 9499 CXX

1981
300
WESTBURY CAMPU
SUNY
OLD WESTBURY N.Y.

John Coyne Asst v.
or security Head

1984
500
Farmingdale (SUNY)
Roosevelt Hall
Farmingdale, NY 11735