KANSAS GAS AND ELECTRIC COMPANY WOLF CREEK GENERATING STATION

1984 EMERGENCY PREPAREDNESS FIELD EXERCISE

2.0 OBJECTIVES AND GUIDELINES

Certifies by Rheaune Clark

8502200165 85824 PDR ADOCK 05000482 PDR PDR

2-0 IE35 1/1 This section contains the exercise objectives along with the guidelines which govern the conduct of this Field Exercise, Part A includes general and specific exercise objectives organized by facility within all participant organizations. Part B contains the guidelines which have been developed for the conduct of the exercise. Part C provides a list of all exercise participants by emergency plan position title.

#### A. EXERCISE OBJECTIVES

#### 1. FOR KANSAS GAS AND ELECTRIC COMPANY:

#### a. General Objectives

- (1) Notification and Mobilization of Emergency Response
  Personne
  - (a) Demonstrate the ability to alert, mobilize and augment KG&E emergency response personnel in a timely manner.
  - (b) Demonstrate the ability to alert Federal, State and local authorities in a timely manner.

#### (2) Emergency Response Facilities and Communications

- (a) Demonstrate the ability to activate the Technical Support Center (TSC), the Operations Support Center (OSC), the Emergency Operations Facility (EOF), the Information Clearinghouse (IC), the Media Release Center (MRC), the Home Office Emergency Center (HOEC), and the General Office (GO).
- (b) Demonstrate the functional and operational adequacy of the TSC, OSC, EOF, IC, HOEC, and GO.
- (c) Demonstrate the adequacy, operability and effective use of emergency communications equipment, and the adequacy of communications procedures and methods.

# (3) Direction and Control

- (a) Demonstrate the ability of each emergency response facility manager to maintain command control over all emergency response activities conducted from his facility throughout the exercise.
- (b) Demonstrate the ability to gather, assess and disseminate information regarding the status of the emergency conditions and the status of emergency response activities in a timely manner.

- (c) Demonstrate the ability to initiate and coordinate emergency response activities in an efficient and timely manner.
- (d) Demonstrate the ability to effectively call upon and utilize KG&E Corporate or outside support organizations when Station capabilities are exceeded.
- (e) Demonstrate the primary functional responsibilities and/or problem solving capabilities of emergency response personnel.
- (f) Demonstrate the ability of the WCGS Security Organization to effectively implement its procedures for responding to an emergency situation.
- (g) Demonstrate the ability of emergency response personnel to execute the WCGS Emergency Plan and associated Emergency Plan Procedures to protect Station personnel and the general public as appropriate.

#### (4) Accident Assessment

- (a) Demonstrate the ability of the TSC and EOF Engineering Teams to analyze current plant conditions, identify projected trends and potential consequences, and provide recommendations for mitigating actions.
- (b) Demonstrate the ability to inform and update appropriate KG&E, State and local emergency response personnel regarding the status of an emergency condition in a timely manner.

## (5) Radiological Assessment

- (a) Demonstrate the ability to coordinate onsite, in-plant and offsite radiological monitoring activities.
- (b) Demonstrate the ability to coordinate dose assessment activities conducted within the TSC with those conducted at the EOF.
- (c) Demonstrate the ability to control and coordinate the flow of information regarding offsite radiological consequences between KG&E radiological assessment personnel stationed at the TSC and the EOF.

# (6) Protective Response

(a) Demonstrate the ability to adequately control the spread of contamination and the exposure of onsite and offsite emergency workers.

## (7) Reentry and Recovery

- (a) Demonstrate the ability to identify and discuss appropriate onsite reentry and recovery activities based upon the current or projected conditions in the affected onsite areas.
- (b) Demonstrate the ability to identify and discuss appropriate support to offsite reentry and recovery activities based upon the current or projected conditions in the affected offsite areas, and methods for de-escalating the general public's response to the emergency condition.

#### Specific Objectives for those Activities Conducted from the Control Room

## (1) Direction and Control

- (a) Demonstrate the precise and clear transfer of responsibilities from the Control Room staff to the TSC staff.
- (b) Demonstrate the ability of the Shift Supervisor to periodically inform Control Room personnel of the status of the emergency situation and the plant conditions.

## (2) Accident Assessment

- (a) Demonstrate the ability of the Control Room staff to make a timely determination of the cause of an incident, and perform mitigating actions to place the unit in a safe, stable condition.
- (b) Demonstrate the ability of Control Room and TSC personnel to classify an emergency condition in a timely manner.
- (c) Demonstrate the ability to analyze current plant conditions, and identify projected trends and potential consequences.

# (3) Radiological Assessment

- (a) Demonstrate the ability to perform onsite and offsite dose assessment activities, as warranted, in a timely manner.
- (b) Demonstrate the ability to assess information available from the containment and effluent high-level radiation monitoring systems and respond accordingly.

# (4) Protective Response

- (a) Demonstrate the ability to formulate and implement onsite protective action measures in a timely manner.
- (b) Demonstrate the ability to account for non-essential personnel in an orderly and timely manner.
- (c) Demonstrate the ability to formulate protective action recommendations, and communicate those recommendations to local authorities in a timely manner as appropriate.
- (d) Demonstrate the ability to respond to and effectively treat an in-plant personnel injury situation involving contamination.

# C. Specific Objectives for those Activities Conducted from the Technical Support Center (TSC)

## (1) Direction and Control

- (a) Demonstrate the precise and clear transfer of responsibilities from the Control Room staff to the TSC staff.
- (b) Demonstrate the ability of the Duty Emergency Director to maintain command control over all emergency response activities conducted from the ISC throughout the exercise.
- (c) Demonstrate the primary functional responsibilities and/or problem solving capabilities of the TSC staff.

# (4) Accident Assessment

- (a) Demonstrate the ability of the TSC staff to support the Control Room staff's effort to identify the cause of an incident, mitigate the consequences of that incident, and place the unit in a safe, stable, condition.
- (b) Demonstrate the proficiency of the TSC personnel to classify an emergency condition.

# (3) Radiological Assessment

(a) Demonstrate the ability of the TSC staff to direct and coordinate in-plant surveys in a timely manner. Demonstrate the ability to dispatch a Radiological Monitoring Team prior to the arrival of the Emergency Operations Facility (EOF) staff, if appropriate.

- (b) Demonstrate the ability to perform timely assessments and projections of onsite and offsite radiological conditions to support the formulation of protective action recommendations.
- (c) Demonstrate the ability to assess information available from the containment and effluent high-level radiation monitoring systems and respond accordingly.
- (d) Demonstrate the ability to analyze samples drawn from the in-plant normal or post-accident sampling systems, and assess the resultant data.

#### (4) Protective Response

- (a) Demonstrate the ability to perform timely assessments of onsite and offsite radiological conditions to support the formulation of protective action recommendations.
- (b) Demonstrate the ability to formulate and implement onsite protective action measures in a timely manner.
- (c) Demonstrate the ability to account for site personnel in a timely manner.
- (d) Demonstrate the ability to evacuate non-essential site personnel in an orderly and timely manner.
- (e) Demonstrate the ability to control the exposure of onsite emergency workers.
- (f) Demonstrate the ability to formulate and communicate protective action recommendations to local authorities in a timely manner as appropriate.
- (g) Demonstrate the ability, per station procedures, to issue potassium iodide (KI) to emergency response personnel.
- (h) Demonstrate the ability to respond to and treat an onsite radiological medical emergency.
- (i) Demonstrate adequacy in coordinating with, and assisting local agencies in transporting and treating a contaminated and injured onsite individual.

## d. Specific Objectives for those Activities Conducted from the Operations Support Center (OSC)

## (1) Direction and Control

(a) Demonstrate the ability of the OSC staff to initiate and coordinate activities in an efficient and timely manner.

## (2) Radiological Assessment

- (a) Demonstrate the ability of the OSC staff to direct and coordinate in-plant surveys in a timely manner.
- (b) Demonstrate the ability to dispatch a Radiological Monitoring Team off-site prior to the arrival of the Emergency Operations Facility (EOF) staff, if appropriate.

#### (3) Protective Response

- (a) Demonstrate the ability to respond to and effectively treat an in-plant personnel injury situation involving contamination.
- (b) Demonstrate the ability to perform timely assessments of onsite and offsite conditions to support the formulation of protective action recommendations.

# e. Specific Objectives for those Activities Conducted from the Emergency Operations Facility (EOF)

## (1) Direction and Control

- (a) Demonstrate the precise and clear transfer of responsibilities from the TSC staff to the EOF staff.
- (b) Demonstrate the ability of the Duty Emergency Manager (DEM) to maintain command control over all emergency response activities conducted from the EOF throughout the exercise.

# (2) Accident Assessment

- (a) Demonstrate the ability of the EOF staff to support the TSC staff's efforts to identify the cause of an incident, mitigate the consequences of that incident, and place the unit in a safe, stable condition.
- (b) Demonstrate the ability to utilize vendor and other outside resources to assist in accident analysis and mitigation efforts.

## (3) Radiological Assessment

- (a) Demonstrate the ability of the EOF staff to direct and coordinate the deployment of Joint Radiological Monitoring Teams in a timely manner.
- (b) Demonstrate the ability to form and coordinate Joint Radiological Monitoring Teams in conjunction with the State and County.
- (c) Demonstrate the ability of the Joint Radiological Monitoring Teams personnel to efficiently and effectively utilize their procedures to perform dose rate surveys, collection and analysis of radiological samples, and other prescribed radiological monitoring activities.
- (d) Demonstrate the use of appropriate equipment for measurement of airborne radioiodine concentrations as low as 10-7 uci/cc in the presence of nuble gases.
- (e) Demonstrate the ability to perform offsite dose assessment activities in a timely manner.
- (f) Demonstrate the ability to coordinate KG&E offsite dose assessment activities with those conducted by the State.

## (4) Protective Response

- (a) Demonstrate the ability to perform timely assessments of offsite radiological conditions to support the formulation of protective action recommendations.
- (b) Demonstrate that decisions can be made regarding protective action recommendations for the general public, Joint Radiological Monitoring Teams and other emergency workers within the Plume Exposure (10-mile) Emergency Planning Zone (EPZ).
- (c) Demonstrate the ability to formulate and communicate protective action recommendations to State and local authorities in a timely manner.
- (d) Demonstrate the ability to coordinate with and assist State agencies and local jurisdictions in the implementation of protective action measures as appropriate.

- f. Specific Objectives for those Activities Conducted from the Home Office Emergency Center (HOEC)
  - (1) Notification and Mobilization of Emergency Response
    Personnel
    - (a) Demonstrate the ability to alert and mobilize the Home Office Emergency Center Organization in a timely manner.

## (2) Direction and Control

- (a) Demonstrate the ability of the HOEC Organization to support the WCGS Emergency Organization in an efficient and effective manner.
- (b) Demonstrate the primary functional responsibilities and/or problem solving capabilities of the HOEC Organization.
- g. Specific Objectives for those Activities Conducted from the Information Clearinghouse (IC) and Media Release Center (MRC)
  - (1) Direction and Control
    - (a) Demonstrate the ability of the IC and MRC staffs to initiate and coordinate activities in an efficient and timely manner.
    - (b) Demonstrate the primary functional responsibilities and problem solving capabilities of the IC and MRC staffs.

## (2) Public Information

- (a) Demonstrate the capability to coordinate the preparation, review and release of information with Corporate personnel, and provide accurate timely information releases to the general public and the news media.
- h. Specific Objectives for those Activities Conducted from the General Office (GO)

# (1) Direction and Control

- (a) Demonstrate the ability of the General Office staff to initiate and coordinate activities in an efficient and timely manner.
- (b) Demonstrate the primary functional responsibilities and problem solving capabilities of the General Office staff.

## (2) Public Information

(a) Demonstrate the ability to establish and operate rumor control in coordination with State and County Officials.

#### 2. STATE OF KANSAS

- Demonstrate the ability to activate, staff, and operate the State EOC and the State Forward Staging Area (FSA) at the Kansas Fish and Game Headquarters in New Strawn.
- Demonstrate the ability to initiate and support 24-hour operation of the State EOC and State Forward Staging Area.
- 3. Demonstrate the ability to make decisions and to coordinate emergency activities with the County and KG&E.
- Demonstrate the adequacy of facilities and displays to support emergency operations.
- Demonstrate the ability to communicate with members of the State Emergency Response Organization, the County EOC, KG&E, and field personnel.
- Demonstrate the ability to mobilize and deploy Joint Radiological Monitoring Team Members in conjunction with the County and KG&E.
- 7. Demonstrate the use of appropriate equipment for determining ambient radiation levels.
- 8. Demonstrate the use of appropriate equipment for measurement of airborne radioiodine concentrations as low as 10-7 uCi/cc in the presence of noble gases.
- 9. Demonstrate the ability to project dosage to the general public via plume exposure, based on plant and field data, and the ability to determine appropriate protective measures, based on Protective Action Guides (PAGs), available shelter, evacuation time estimates, and all other appropriate factors.
- Demonstrate the ability of State radiological assessment personnel to monitor environmental conditions and provide information to the appropriate decision makers.
- 11. Demonstrate the ability to formulate and distribute appropriate instructions to the public in a timely fashion.
- 12. Demonstrate the ability to control access to an evacuated area.
- 13. Demonstrate the ability to identify the need for, request and obtain Federal assistance.
- 14. Demonstrate the ability to distribute personnel dosimetry and continuously monitor and control emergency worker exposure.
- 15. Demonstrate the ability to decide, based on predetermined criteria, whether to issue KI to emergency workers.

- 16. Demonstrate the ability to cooordinate timely and accurate media releases with the County, KG&E, and other organizations.
- 17. Demonstrate the ability to provide advance coordination of information released.
- 18. Demonstrate the ability to coordinate rumor control in conjunction with the County and KG&E.
- 19. Demonstrate the ability to estimate total population exposure.
- Demonstrate the decision making process to determine the appropriate measures for controlled recovery and reentry.
- 21. Demonstrate the ability to assess and critique the exercise in order to determine areas requiring additional improvement.

## 3. LOCAL EMERGENCY ORGANIZATION

- Demonstrate the ability to promptly notify and mobilize the Coffey County Emergency Response Organization.
- Demonstrate the ability to initiate and support 24-hour operation of the County EOC.
- Demonstrate the ability to make decisions and to coordinate emergency activities with the State and KG&E.
- Demonstrate the adequacy of facilities and displays to support emergency operations.
- Demonstrate the ability to communicate with members of the Coffey County Emergency Response Organization, the State, other local organizations, and KG&E.
- Demonstrate the ability to request outside support when local capabilities are exceeded.
- Demonstrate the ability to mobilize Joint Radiological Monitoring Team members in conjunction with the State and KG&E.
- 8. Demonstrate the use of appropriate equipment for determining ambient radiation levels.
- Demonstrate the use of appropriate equipment for measurement of airborne radioiodine concentrations as low as 10-7 uCi/cc in the presence of noble gases.
- 10. Demonstrate the ability to determine appropriate protective measures, based on Protective Action Guides, available shelter, evacuation time estimates, and all other appropriate factors.
- 11. Demonstrate the ability to alert the public within the effective 10-mile EPZ, and to disseminate an initial instructional message within 15 minutes after the decision is made to do so.
- 12. Demonstrate the adequacy of notification procedures for alerting the public within 45 minutes for the portion of the Flint Hills National Wildlife Refuge not covered by the given system, but within the effective 10-mile EPZ.
- 13. Demonstrate the ability to formulate and distribute appropriate instructions to the public in a timely fashion.
- 14. Demonstrate the ability to organize and manage the resources necessary to support an orderly evacuation of the affected subzones within the effective 10-mile EPZ.
- 15. Demonstrate the ability to control access to an evacuated area.

- 16. Demonstrate the organizational ability and resources necessary to deal with impediments to evacuation such as any actual conditions, inclement weather, or traffic obstructions during the exercise.
- 17. Demonstrate the decision making ability and coordination necessary to evacuate non-ambulatory individuals within the affected subzones within the effective 10-mile EPZ.
- 18. Demonstrate the decision making ability and coordination necessary to evacuate the schools within the affected subzones within the effective 10-mile EPZ.
- 19. Demonstrate the ability to distribute personnel dosimetry and continuously monitor and control emergency worker exposure.
- 20. Demonstrate the ability to coordinate timely and accurate media releases with the State, KG&E, and other organizations.
- Demonstrate the ability to provide advance coordination of information released in conjunction with the State and KG&E.
- 22. Demonstrate the ability to coordinate rumor control in conjunction with the State and KG&E.
- 23. Demonstrate adequacy of ambulance and hospital facilities, in coordination with KG&E, for handling a contaminated and injured onsite individual.
- 24. Demonstrate the ability to register and conduct radiological monitoring of evacuees at a host County Registration Center.
- 25. Demonstrate the procedures and decision-making process to select adequate facilities for the 24-hour care of evacuees.
- 26. In conjunction with KG&E, demonstrate adequate equipment and procedures for decontamination of emergency workers, equipment and vehicles.
- 27. Demonstrate the decision making process to determine the appropriate measures for controlled recovery and reentry.
- 28. Demonstrate the ability to assess and critique the exercise in order to determine any areas requiring additional improvement.

#### B. EXERCISE GUIDELINES

The following exercise guidelines have been developed to define the extent of "play" by the exercise participants and meet the aforementioned exercise objectives:

- The KG&E Field Exercise will be conducted on November 7, 1984.
   Since exercise participants will not possess prior knowledge of the exercise start time, all personnel should follow their normal routines for that day.
- All onsite and offsite emergency response facilities, including those State facilities located in Topeka, will be manned and perform their prescribed functions as appropriate to the development of the exercise scenario.
- 3. Prior to commencement of the exercise, all Control Room participants will be pre-positioned in the WCGS Plant Simulator. Control Room activities will be performed from the plant simulator. Controllers will be provided with a separate set of scenario messages which will replace the regular set of simulator messages in the event of a simulator failure.
- 4. Communications involving the Control Room will be duplicated in the plant simulator. The use of radiological data terminals (RM-11), and Fire Protection Panels (KC008) which are not duplicated in the plant simulator, will be simulated.
- 5. Exercise participants from the KG&E Home Office, who are assigned emergency response roles at the EOF, will pre-position themselves at the KG&E Word Processing Center in Emporia, Kansas, at a time to be specified during the exercise participants' briefing. These exercise participants will not be informed of ongoing scenario events prior to their deployment and arrival at the EOF.
- Following the establishment of initial conditions, the Field Exercise will commence with a postulated plant condition necessitating the declaration of an emergency at WCGS.
- 7. The postulated accident conditions may result in a simulated radiological release which necessitates the consideration of protective actions for the general public. Meteorological conditions may be varied throughout the exercise.
- 8. The postulated accident conditions may necessitate the evacuation of the affected offsite population. If required by the exercise scenario, the evacuation will be simulated. However, a sample population will be available for in-processing and monitoring at a Registration Center.
- The postulated scenario may require the decontamination of offsite equipment or vehicles. This will be accomplished at the EOF decontamination facility.

- Exercise players will perform, as appropriate, radiological monitoring and dose assessment activities.
- 11. Three offsite Joint Radiological Monitoring Teams and one onsite radiological monitoring field team will be dispatched for the purpose of testing response time, communications, and monitoring and sampling procedures. The field teams will gather sample material and route those samples for analysis.
- 12. Each radiological monitoring field team will be accompanied by a controller/observer team throughout the exercise. Each field team will rendezvous with its controller/observer team at the location at which it obtains its emergency kits. The rendezvous locations are as follows:
  - a. OSC (onsite team), and
  - b. EOF (offsite teams).
- 13. If required by the exercise scenario, a number of representative highway barricade materials shall be deployed to positions in accordance with procedures; however, traffic control will only be simulated and roads shall not be closed.
- 14. The IC/and MRC in Topeka will be manned and perform the prescribed functions. Members of the press will be identified and invited to participate; however, the extent of play will be limited to questions regarding the exercise events. Questions regarding items such as the success of the exercise will not be addressed.
- 15. As appropriate, Emergency Broadcast System (EBS) announcements should be prepared and passed to the appropriate station, but not released to the general public.
- 16. As appropriate, procedures for the activation of the Alert and Notification System will be demonstrated up to, and including, siren activation.
- 17. The Flint Hills National Wildlife Refuge will be notified. As appropriate, the alert and notification process will be demonstrated for that part of the reserve within the affected portions of the effective 10-mile EPZ.
- 18. The postulated accident conditions may warrant the assembly and evacuation of non-essential site personnel. If required by the exercise scenario, the Site Evacuation Alarm will be sounded, and accountability and evacuation of site personnel will be performed. Following completion of accountability and evacuation activities, non-essential site personnel will be allowed to return to the site.
- 19. Participation by KG&E onsite personnel directly involved in responding to an emergency shall be carried out to the fullest extent possible, including the deployment of the radiological monitoring teams, emergency repair teams, and other emergency workers.

- 20. Exercise participants will include the following emergency plan position holders and organizations, and any support staff they deem appropriate for a proper response to the exercise scenario:
  - a. Kansas Gas and Electric Company
    - (1) Control Room Organization
      - (a) Shift Supervisor
      - (b) Supervising Operator
      - (c) Reactor Operators
      - (d) Nuclear Station Operators
    - (2) Operations Support Center (OSC) Organization
      - (a) OSC Supervisor
      - (b) OSC Communicators (2)
      - (c) OSC Clerks (2)
      - (d) WCGS Security Force (2)
      - (e) Chemistry Director
      - (f) Onsite Survey Team Director
    - (3) Technical Support Center (TSC) Organization
      - (a) Duty Emergency Director
      - (b) Chemistry Coordinator
      - (c) Maintenance Emergency Coordinator
      - (d) Operations Emergency Coordinator
      - (e) Technical Support Coordinator
      - (f) Operations Assessment Coordinator
      - (g) Administrative Emergency Coordinator
      - (h) Security Emergency Coordinator
      - (i) Radiological Emergency Coordinator
      - (j) Dose Assessment Coordinator
      - (k) Radiological Assessment Coordinator

- (4) Emergency Operations Facility (EOF) Organization
  - (a) Duty Emergency Manager
  - (b) Administrative Resources Manager
  - (c) Radiological Assessment Manager
  - (d) Dose Assessment Supervisor
  - (e) Radiological Assessment Supervisor
  - (f) Technical Resources Manager
  - (g) Public Information Coordinator
  - (h) Security Supervisor
- (5) Media Release Center
  - (a) Public Information Officer
  - (b) Spokesp€. son
  - (c) MRC Manager
- (6) !'ome Office Emergency Center
  - (a) Advisory Resources Manager
  - (b) Engineering Support
- (7) General Office
  - (a) Corporate Support
- b. State of Kansas
  - (1) State Division of Emergency Preparedness
  - (2) Kansas Department of Health and Environment/ Bureau of Air Quality and Radiation Control
  - (3) Kansas Highway Patrol
  - (4) Kansas National Guard
  - (5) Kansas Department of Transportation
  - (6) Kansas Fish and Game Commission
  - (7) Kansas Board of Agriculture
  - (8) Adjutant General's Department Public Information/Relations Director

- c. Coffey County Emergency Response Organization
  - (1) Board of Coffey County Commissioners
  - (2) County Sheriff
  - (3) Emergency Preparedness Coordinator
  - (4) Public Information Officer
  - (5) County Engineer
  - (6) Fire Leader
  - (7) Health and Medical Management Team Leader
  - (8) Shelter Systems Officer
  - (9) County Attorney
  - (10) Radiological Defense Officer
- d. Other Participating Organizations
  - (1) Coffey County Ambulance Service
  - (2) Ransom Memorial Hospital
  - (3) U.S. Fish and Wildlife Service
  - (4) Lyon County Emergency Preparedness Coordinator (host county)
- 21. Active participation in the Field Exercise will only be required of the organizations or participants listed under item 20 above. If the exercise scenario requires that any other organizations and/or officials be contacted, they shall be contacted for the purpose of checking communications only. All other Federal responses to the postulated emergency conditions, including those of the Federal Radiological Monitoring Assistance Plan (FRMAP) and Department of Energy, shall be simulated through FEMA or NRC personnel stationed in Kansas City, Missouri, and Arlington, Texas, respectively.
- 22. If required by the exercise scenario, alternate means of accessing the plant shall merely be simulated and <u>not</u> actually implemented.

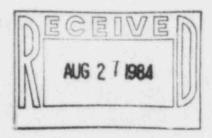
No other live or simulated events are to be included in the extent of "play" of the exercise.



GLENN L KOESTER

August 24, 1984

Mr. John T. Collins, Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza Drive, Suite 1000 Arlington, Texas 76011



KMLNRC 84-153

Re: Docket No. STN 50-482

Ref: Letter dated 02/09/84 from JTCollins,

NRC, to GLKoester, KG&E

Dear Mr. Collins:

Per the NRC instructions in the Reference, transmitted herewith is the WCGS 1984 Emergency Preparedness Field Exercises Objectives and Goals.

Yours very truly,

Allem & Lestre

GLK:bb Enc.

xc: PO'Connor HBundy

Director, Division of Emergency
Preparedness and Engineering
Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

I 835 PIX