

NOV 02 1984

Docket No.: 50-458

Mr. William J. Cahill, Jr.
Senior Vice President
River Bend Nuclear Group
Gulf States Utilities Company
Post Office Box 2951
Beaumont, Texas 77704
ATTN: Mr. J. E. Booker

Dear Mr. Cahill:

SUBJECT: FEMA Report on Offsite Radiological Emergency Response Plans for
River Bend Station

The enclosed memorandum from Richard W. Krimm, Assistant Associate Director, Office of Natural and Technological Hazards Programs, FEMA, dated September 27, 1984, forwards the FEMA report on the adequacy of offsite planning around the River Bend Station.

FEMA's report is based on the FEMA Region VI review of the offsite radiological emergency response plans for the State of Louisiana and the River Bend Parishes. FEMA Region VI identified inadequacies in the offsite plans and a meeting was held on September 20, 1984, between FEMA Region VI and the State of Louisiana to resolve these inadequate elements.

We request that Gulf States Utilities Company coordinate their emergency planning efforts with those of the State and local emergency planning authorities to ensure that the inadequacies in the offsite emergency plans are corrected in a timely manner.

If you have any questions or desire further discussion please contact NRC Project Manager Edward Weinkam.

Original signed by:

A. Schwencer
Licensing Branch No. 2
Division of Licensing

8411140159 841102
PDR ADOCK 05000458
F PDR

Enclosure:
Memo dated 9/27/84 fr
Richard Krimm

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

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A handwritten signature in cursive script that reads "A. Schwencer".

A. Schwencer
Licensing Branch No. 2
Division of Licensing

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Memo dated 9/27/84 fr
Richard Krimm

cc: See next page

River Bend Station

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ENCLOSURE



Federal Emergency Management Agency

Washington, D.C. 20472

SEP 27 1984

MEMORANDUM FOR: Edward L. Jordan
Director, Division of Emergency
Preparedness and Engineering
Response
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Interim Finding on Offsite Radiological Emergency Response
Plans for the River Bend Station

Attached is a copy of the Federal Emergency Management Agency's (FEMA) Interim Finding on the adequacy of the Louisiana Peacetime Radiological Response Plan (Revision V) site-specific to the River Bend Station. The Interim Finding Report was prepared by the FEMA Region VI staff. The Louisiana State Plan as well as the Parish Plans of East Baton Rouge, East Feliciana, Pointe Coupee, West Baton Rouge, and West Feliciana, all dated December 1983, were reviewed by the FEMA Region VI staff and the Regional Assistance Committee. The Plans were reviewed against Section II, Planning Standards and Evaluation Criteria, NUREG-0654/FEMA REP-1, Rev.1 (A-P).

The inadequate elements discovered by the review of the State and Parish Plans have been furnished to the State of Louisiana by letter for comment and/or correction. A meeting has been tentatively scheduled later this month with the State of Louisiana and Parish officials to discuss and resolve the elements found to be inadequate. Our Regional Office will maintain close liaison with the State of Louisiana to ensure that inadequate elements are corrected to our satisfaction. A schedule of corrective actions will be provided to you as soon as possible after this meeting.

A further review of adequacy on the State and Parish Plans will be made once the Regional Assistance Committee completes its review of the corrections to the plans.

Attachment
As Stated

8410040449

RIVER BEND STATION

LOUISIANA PEACETIME RADIOLOGICAL RESPONSE PLAN
Revision 5, December 1983

RAC CONSOLIDATED COMMENTS

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EVALUATION/REMARKS</u>
A.1.a.		ADEQUATE.
	FEMA	Plan does identify specific State, local, Federal, and private organizations that would play a part in responding to an accident at R.B.S. Pages 17-25.
	ANL	Same remarks as FEMA.
A.1.b.		ADEQUATE.
	FEMA	Plan specifies role and concept of organizations and suborganizations (pages 12-14 and 17-24). Cross reference to attachments and implementing procedures should show page numbers. No implementing procedures provided for review.
	ANL	Same remarks as FEMA.
A.1.c.		ADEQUATE.
	FEMA	Both organization and flow of decisions provided in diagram. Pages 14 and 16.
	ANL	Same remarks as FEMA.
A.1.d.		INADEQUATE.
	FEMA	LNED - No title, except "Administrator," referenced in V.B., last line. No title - LOEP. Reference to "several designated state departments." No titles for State DOA, Commerce (Office of Commerce and Industry), Department of Corrections, DHHS (Office of Health Services and Environmental Control), Department of Labor, OES. Page 15, but no page numbers for attachments.
	ANL	The title of the head of LNED should be given.
A.1.e.		ADEQUATE.
	FEMA	Will be provided by LOEP on a "continuous operation" basis. Page 42, but no page numbers for attachments.
	ANL	Same remarks as FEMA.

8410040456

NUREG-0654AGENCYEVALUATION/REMARKS

A.2.a.

INADEQUATE.

FEMA

No key individuals by title given. Pages 17-24; but no page numbers for attachments.

EPA

Same remarks as FEMA.

USDA

Assistant Secretary, Office of Environmental Affairs, authorized to request technical assistance from Federal agencies.

Outlines responsibilities of Louisiana Department of Agriculture and cites assistance and liaison with USDA.

Outlines responsibilities of the Department of Health and Human Resources, Office of Health Services and Environmental Quality. (Includes assistance by local USDA personnel in agricultural sampling.)

Request for Federal support coordinated through FEMA.

NRC

Assignment of responsibility to key individuals, by title, is for most part in implementing procedures; direction and control is responsibility of parish governments. Governor can assume responsibility by officially declaring an emergency.

FDA

The plan does not include key individuals by title.

Authority to request Federal Assistance by ASOEA and LNED Administrator, Page 15, V.B.

LNED makes recommendations for protective actions to local Parish. Parish has the responsibility for initiating the protective action.

ANL

Organizational responsibilities are clearly set forth, but the key individual for each organization should be named.

A.2.b.

ADEQUATE.

FEMA

Authority by acts, codes, and statutes are listed on Page 1 of Basic Plan.

FDA

Authority of State Acts on Page 1, 1.B.

ANL

Same remarks as FEMA.

NUREG-0654AGENCYEVALUATION/REMARKS

A.3.

INADEQUATE.

FEMA

Only six letters of agreement have been signed with the State of Louisiana. Also, an MOU has been signed between G.S.U., LP&L, MP&L, and the State of Louisiana. Others are still yet to be signed. Plan does not include a signature page or state that all letters of agreement are on file with the State of Louisiana. Need page numbers for cross reference.

EPA

No letters of agreement included as part of the Plan, although listings of letters of agreement are included. Cannot be determined from the Plan what specific resources are relied upon to be provided by external agencies.

USDA

Citation for MOU with USDA/Louisiana State Emergency Board.

ANL

Letters of agreement or a signature page should be included.

A.4.

ADEQUATE.

FEMA

Principal individual is the ASOEA and the alternate is the LNED Administrator. Pages 15 and 17.

DOE

Same remarks as FEMA.

ANL

Same remarks as FEMA.

C.1.a.

ADEQUATE.

FEMA

ASOEA or LNED Administrator is authorized to request Federal assistance.

DOE

Title of persons from LOEP not specified for contacting FEMA, but otherwise adequate.

NRC

Same remarks as FEMA.

ANL

Same remarks as FEMA.

C.1.b.

ADEQUATE.

FEMA

Federal Radiological Emergency Response Plan is in the process of being finalized. Page 25.

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AGENCYEVALUATION/REMARKS

DOE

The stated reference does not include expected arrival times. In addition on Page 86IIC, it would be more accurate if the following phrase were deleted: "...as well as assisting with the disposal of contaminated materials" or changing it to: "...assisting to advise on the disposal..." The utility is responsible for disposal as correctly stated elsewhere in plan.

ANL

The federal plans are not yet finalized.

INADEQUATE.

FEMA

FEMA is noted in plans as being the lead agency and would be responsible for logistical support, telephone lines, radio frequencies, etc., in working in coordination with State and local government agencies.

There should be a statement in the plan that would insure that certain resources would be available to support the federal effort. Page 25.

DOE

No mention is made of any resources available to support the federal response by the State or locals. If none are available, it should be so stated.

EPA

Specific arrangements to support a Federal response to be outlined in implementing procedures, which still have not been completed..

ANL

However, the FRERP not yet finalized.

ADEQUATE.

FEMA

LNED will dispatch a liaison to the EOF. Page 13.

NRC

LNED to dispatch liaison to the licensee's EOF and to maintain direct communications with LNED Headquarters.

ANL

Same remarks as FEMA.

INADEQUATE.

FEMA

Louisiana State University, Nuclear Science Center, provides mutual assistance plan between 13 states for support to accident in participatory state. Also provides specific equipment available to LNED and availability of other civil defense equipment through LOEP. Pages 25, 58, and 60.

C.1.c.

C.2.a.

C.3.

NUREG-0654

<u>AGENCY</u>	<u>EVALUATION/REMARKS</u>
DOE	Need more discussion about capabilities and availability along with letters of agreement.
EPA	Radiological laboratory support is identified in BP VII.B.1, 2. Specific support expectations or needs from EPA are still not detailed.
NRC	LNED has principal responsibility. LNED lab in Baton Rouge continuously maintained and has 24-hour capability. LSU Nuclear Science Center may provide support. Support also may be provided by other states through the Southern Mutual Radiological Assistance Plan.
FDA	Did not see any identified general capabilities for L.S.U.
ANL	None of the references specifically identify radiological laboratories, their capabilities, or availabilities.
3.4.	ADEQUATE.
FEMA	Plan includes listing of seven agencies with whom agreements have been reached. Support also available through the Southern Mutual Radiological Assistance Plan which includes a signature page by all of the State governors. Page 25.
DOE	Description but letters of agreement not included. Letters of agreement are listed in Tab for Chapter 14, Page 115.
EPA	Support organizations are identified in BP Sec. VII.
NRC	State plan adequately describes assistance that may be provided in an emergency. Are there any letters of agreement necessary to support these arrangements?
FDA	Identified Federal Agencies, L.S.U., SMRAP, and various local community services and other public and private resources.
ANL	Criterion met by Southwestern Mutual Assistance Plan which contains signatures of the Governors. However, technical assistance available from other nuclear power stations should also be included.

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D.3.

AGENCYEVALUATION/REMARKS

ADEQUATE.

FEMA

State and local organizations do have EAL's established consistent with the utility. Pages 31 and 36.

NRC

State plan satisfies this criterion.

FDA

Emergency classification and action level scheme consistent with that established by facility.

ANL

Same remarks as FEMA.

D.4.

INADEQUATE.

FEMA

Plan describes mutually agreeable basis for accident notification of response organizations and provides for the concept of operations. Pages 37 and 38.

EPA

Notification procedures are outlined in BP Chapter 2, the implementing procedures which detail the specific procedures are still missing from the plan.

USDA

Utility will notify State and risk Parishes of incident and emergency classification level. LOEP will notify FEMA Region VI of an accident, as determined by the emergency class. LNEP will notify State departments designated to support emergency response.

NRC

State plan provides for early and prompt notification to principal offsite authorities upon declaration of any emergency class. Plan states that facility will provide notification "immediately upon recognition that events have occurred which make declaration of an emergency class appropriate." It should be noted that NRC regulations require that "a licensee shall have the capability to notify responsible State and local governmental agencies within 15 minutes after declaring an emergency (10CFR50, Appendix E)."

FDA

Procedures for accident notification located on Pages 37-38.

E.2.

INADEQUATE.

FEMA

Internal procedures for alerting, notifying, and mobilizing emergency response personnel were not available for review. Page 17.

NUREG-0654AGENCYEVALUATION/REMARKS

DOE Description in basic plan, however, implementing procedures were not included.

NRC This is covered in implementing procedures for state agencies.

FDA This is a common responsibility of all State Agencies to include in their implementing procedures.

E.5.

INADEQUATE.

FEMA Plans do describe basic purpose of the Alert and Notification System, but the implementing procedures were not available for review. Pages 44-48.

DOE Adequate description, but implementing procedures are not available.

E.6.

ADEQUATE.

FEMA Plan does describe administrative and physical means and time required (15 minutes) for notifying and providing prompt instruction to the public within the plume EPZ. Need page numbers for attachments. Pages 44 and 45.

NRC Plan provides for alerting public in 10-mile EPZ within 15 minutes. Provides for direct coverage of essentially 100% of the population within five miles. Provides for coverage of the entire plume exposure pathway EPZ (for those who may not have received the initial notification) within 45 minutes.

E.7.

INADEQUATE.

FEMA Plan does not provide for draft written messages. Page numbers should be included for attachments.

FDA "EBS Message Listing" on Page 12, Attachment 3. Actual messages, to be developed as part of the implementing procedures, will be included with them.

DOE Not included.

ANL Inadequate. Written messages for the public are not included in the plan.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
F.1.a.	FEMA	ADEQUATE. 24-hour coverage of the direct dedicated telephone circuit will be provided by LOEP, which maintains continuous operation. A radio system will be used as a back-up to the hotline and will be available at each direct dedicated telephone site. Commercial telephone will be used for notification and mobilization of State and local organizations having response assignments. Page 42.
F.1.b.	ANL	ADEQUATE. However, the communications implementing procedure mentioned in III.A.5 is still being developed for River Bend Station.
F.1.b.	FEMA	ADEQUATE. There is a reliable communications system established for off-site emergency response organizations within the EPZ. Pages 42 and 43.
F.1.b.	DOE	Same remarks as FEMA.
F.1.b.	ANL	Same remarks as FEMA.
F.1.c.	FEMA	ADEQUATE. LOEP will utilize the NACOM landline and radio systems to communicate with FEMA Region VI for the coordination of Federal support to protective response operations for an accident. NAWAS will be utilized as a back-up for Federal/State communications. Page 43.
F.1.c.	DOE	Adequate for initial notification.
F.1.d.	FEMA	ADEQUATE. There will be communications between the utility and the EOF, State, and local EOC's and radiological monitoring teams. LNEP radio system is the network that the monitoring teams will use. Page 42.
F.1.d.	DOE	Same remarks as FEMA.
F.1.d.	NRC	Plan provides for direct, dedicated telephone between River Bend Station and state and local response organizations. Civil Defense radio serves as back-up. Communication with field monitoring teams is via two-way radio.

<u>NUREG-0634</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
F.1.e.		ADEQUATE.
	FEMA	Provisions for alerting or activating emergency personnel in each response organization has been established.
	DOE	Same remarks as FEMA.
	ANL	Adequate. However, the implementing procedure is still being developed.
F.2.		ADEQUATE.
	FEMA	Communications link for both fixed and mobile exists through the local Emergency Medical Services Communication systems. Page 43.
	ANL	Should provide some description of the arrangements or show where the information on communications with medical facilities can be found.
F.3.		ADEQUATE.
	FEMA	Proper testing frequency of the communications system is stated in the plan. Communications drills will be conducted monthly, quarterly, and annually. Page 112.
	USDA	24-hour coverage of the direct dedicated telephone circuit by LOEP. Communication systems are tested monthly and quarterly.
G.1.		ADEQUATE.
	FEMA	LNED will coordinate Public Information Program. All required information will be included according to plan. Pages 46 and 47.
	USDA	Includes procedures for annual dissemination of public information materials.
	FDA	LNED will coordinate a comprehensive public information program, Page 46, Chapter 5.
	ANL	Adequate provided that the information referred to has actually been disseminated.

NUREG-0654AGENCYEXPLANATION/REMARKS

G.3.a.

INADEQUATE.

FEMA

Principal organizations will have a designated point of contact and physical location for use by news media. There will be a periodic joint news media briefing at the designated media center, but no physical locations are identified in the plans.

NRC

Points of contact are not identified for statewide information. Where is the state media center? Section C, which had identified the media centers, has been deleted from the plan.

ANL

Inadequate. The location of the media center is not given.

G.4.a.

ADEQUATE.

FEMA

The Governor's Press Secretary or his designee is the spokesperson for the State. The ASOEA will review and coordinate all emergency public information available from State agencies and forward it to the Governor's Press Secretary. Plan also gives spokespersons of several official organizations. Each risk parish will also have a spokesperson. Pages 47 and 48.

NRC

Governor's Press Secretary or designee is state spokesperson. Extensive coordination of press releases called for by the plan will be difficult to achieve unless all spokespersons are in the same location.

G.4.b.

ADEQUATE.

FEMA

The Governor's Press Secretary will exchange information with the spokespersons of all official organizations. Other organizations will notify the Governor's Press Secretary prior to release of information. Page 48.

ANL

Same remarks as FEMA.

G.4.c.

ADEQUATE.

FEMA

A rumor control center will be activated and operated throughout an emergency accident. Page 48.

ANL

Same remarks as FEMA.

NUREG-0654AGENCYEXPLANATION/REMARKS

G.5.

ADEQUATE.

FEMA

LNED will conduct an annual program to acquaint the news media. The annual program will include participation by principal state response organizations, parish governments, and fixed nuclear facility representatives. Page 47.

DOE

Same remarks as FEMA.

ANL

Same remarks as FEMA.

H.3.

ADEQUATE.

FEMA

State EOC is located in the basement of the State and National Resources Building, Baton Rouge, and will be activated by LOEP. LNED will operate from its EOC at 4845 Jamestown, Baton Rouge. The licensee will operate from its EOF and LNED will dispatch a liaison person to the EOF as determined by the emergency class. Pages 12 and 13. No page numbers were given on attachments.

H.4.

INADEQUATE.

FEMA

Implementing Procedures. List only; no implementing procedures provided. No page numbers for attachments.

NRC

This is provided for in the state plan, Implementing Procedures for individual agencies.

DOE

No implementing procedures.

ANL

Inadequate. Implementing Procedures are not yet finalized.

H.7.

ADEQUATE.

FEMA

LNED is the agency responsible for off-site radiological monitoring and has listed the equipment on pages 58-60, Tab 3, Table 1, and Tab 4, pages 62 & 63. Note that Tab 3, Table 1, and page number should be included in cross reference.

DOE

Adequate for state response. Instruments for monitoring by local personnel at shelters, etc., are not mentioned in these references.

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EPA

BP Chap. 6, Tab 3, Table 1, lists the needed equipment. If EPA recommended dose limits to emergency workers are to be used, as stated in BP Chap. 6, Tab 1, then 0-200 mR pocket dosimeters may not be sufficient. Higher range dosimeters will be needed to monitor worker exposures when they exceed 200 mR per task, and should be available. We note also that in BP Chap. 9, V.B., both high and low range dosimeters are to be provided emergency workers.

Emergency sampling procedures are outlined in BP Chap. 6, Tab 4.

The plan anticipates using in-house data processing and computer capabilities, with calculations to be performed at LNED (BP Chap. 6).

NRC

LNED, the primary response agency for accident assessment, is headquartered in Baton Rouge and maintains its monitoring equipment there.

H.10.

ADEQUATE.

FEMA

LNED will inspect quarterly, or after use, all inventory and check all emergency equipment and instrumentation. Calibration of emergency monitoring equipment shall be performed at least semi-annually. Page 56. References to Enclosure 1 should include Page 1.

NRC

State plan provides for quarterly equipment checks and semiannual calibration of instruments.

H.11.

INADEQUATE.

FEMA

Plan has radiological equipment listed. No communications equipment is listed. Page 60 should be added to cross reference. Pages 58-60.

EPA

Most previous EPA comments are still applicable. BP Chap 6, Tab 3, Table 1, lists required equipment, and the sampling supplies list is now labeled as comprised of "three identical kits," although the kits will apparently not include radiation instrumentation which will need to be collected (and the time invested to do this). Instructions for monitoring instruments, and check sources, are still not included in the kits.

Kits no longer are to contain personal dosimeters and chargers which are now listed with portable instrumentation. This change seems ill-advised, unless the personnel monitoring equipment is to be placed in separate kits

NUREG-0654AGENCYEXPLANATION/REMARKS

NRC State plan lists available equipment for sampling and monitoring, some of which is identified as being in kits. However, are there other kits in use by state agencies other than LNED? If so, they should be identified here.

H.12.

ADEQUATE.

FEMA Field Response Center Locator at EOF. Coordination of teams is by Field Monitoring Team Leader at FRC (EOF). Page 55.

NRC State Field Response Center (at EOF) will serve as central point for receipt and collection of field monitoring data and coordination of sample collection.

FDA The FRC is located at the facility EOF.

I.7.

ADEQUATE.

FEMA Plan describes the field monitoring operational methods, procedures, and equipment. Pages 55-61.

EPA BP Chap. 6, Tab 3; reflects capability for field monitoring within the plume exposure EPZ.

NRC State plan adequately addresses LNED's capability and resources for field monitoring.

I.8.

INADEQUATE.

FEMA No Implementing Procedures. No deployment times given. Pages 55-61.

EPA EPA's previous comments are generally still applicable. Detailed arrangements are referenced to the implementing procedures, which were not made available to us.

ANL Estimated times needed for deployment of the field teams is not given.

I.9.

ADEQUATE.

FEMA LNED does have the capability to detect and measure radiological concentration in the air in the plume exposure EPZ as low as 10^{-7} uCi/cc under field conditions. Page 56. Error is cross reference should read: Tab 3, F.2.

EPA Adequate capability is claimed (BP Chap 6, Tab 3, F.2.b.).

NUREG-0654

I.10.

AGENCY

FEMA

DOE

EPA

NRC

FDA

ANL

I.11.

FEMA

DOE

EPA

EXPLANATION/REMARKS

INADEQUATE.

The implementing procedures need review. Page numbers should be given for reference.

Implementing procedures not adequate.

Methods for estimating dose from releases are not adequate. BP Chap 6, however, as noted, the detailed procedures required evidently be contained in the implementing procedures.

LNED will make dose projections for releases from the facility supplied information. The following information is needed for dose projections:

- facility supplied information
- release rates and methods
- sampling and monitoring data
- in-house data processing methods for dose projections

Manual calculation methods for dose projections are not adequate. Manual calculation methods use method established in the Action Guides and Protection Guides for Accidents."

The means to relate measurements to releases are described in the information available for review.

Inadequate. Alternative methods used to estimate dose from releases does not appear to be adequate and should be addressed in Chapter 6.

ADEQUATE.

State LNED has established procedures to track the airborne releases.

Same remarks as FEMA.

The plan calls for tracking the plume from follow-up monitoring and release information from the operator (Chap 6, the NUREG-0654 criteria). The plume is open to the public and seems to us not adequate.

UREG-0654

AGENCYEXPLANATION/REMARKS

I.2.

ADEQUATE.

FEMA

The West Feliciana Parish enclosure states that on-site River Bend Station employees will evacuate by private vehicle and two evaluation routes are established. Also, workers will be radiologically monitored prior to evacuating the plant site.

Note, the cross reference needs to state Enclosure V, Section G.3, pages V-25 and V-26.

ANL

Same remarks as FEMA.

I.9.

ADEQUATE.

FEMA

LNED has established a capability for implementing protective measures and is consistent with recommendations of EPA. Pages 66-70 and Pages 74-80.

EPA

As detailed in our previous comments, protective response arrangements are adequate.

FDA

The capability for implementing protective measures are in Chapters 7 and 8.

I.10.a.

ADEQUATE.

FEMA

Appropriate maps are provided in the General Plans with Shelter and Reception Center maps in the Parish Plans. Page numbers should be given in cross reference for Parish Plan maps as well as maps in the General Plan. General Plan Pages 32-45. E.B.R. Page I-29, E.F. Page II-28, P.C. Page III-30, W.B.R. Page IV-25, and F. Page V-27.

ANL

Same remarks as FEMA.

I.10.b.

ADEQUATE.

FEMA

Plan has maps showing projected permanent and transient population in plume EPZ (Page 33) and in ingestion EPZ (Page 35). Correct cross reference should be General Plan. Pages 33 and 35.

ANL

Same remarks as FEMA.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
J.10.c.		ADEQUATE.
	FEMA	Plan provides for A/N system including sirens, monitors, mobile loudspeakers, EBS, etc.
	ANL	Same remarks as FEMA.
J.10.d.		ADEQUATE.
	FEMA	Specific arrangements have been made for the transportation of institutionalized persons and school children. Basic Plan, Pages 66-67 and 69-70.
	ANL	Same remarks as FEMA.
J.10.e.		INADEQUATE.
	FEMA	K.I. will be ordered by ASOEA; plan does not contain outline of where stored. Pages 67-69, 91, 94.
	FDA	On Page 94, the Secretary, L.D.H.H.R., will advise the ASOEA on risk and protective factors at the time of accident. This should be done prior to the accident.
	ANL	The quantity, availability, and storage locations of KI should be included in the plan.
J.10.f.		ADEQUATE.
	FEMA	The ASOEA will recommend the use of KI for emergency workers and institutionalized persons. Criteria for use of KI is covered in the plan. Page 94.
	FDA	It has been determined that K.I. will not be used for the General Population, except for institutionalized persons.
J.10.g.		ADEQUATE.
	FEMA	Prearranged procedures have been established for relocation. Primary means of transportation will be by private vehicles. Pages 65 and 66.
	ANL	Same remarks as FEMA.
J.10.h.		ADEQUATE.
	FEMA	Parish plans do provide list of reception centers and shelters. Page numbers need to be put in cross reference for Parish plans. E.BR Pages I-29a-29e; E.F. Pages II-28a-28e; P.C. Pages III-30a-30e; W.B.R. Pages IV-25a-25e; and W.F. Pages V-27a-27e.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
J.10.i.		INADEQUATE.
	FEMA	General Plan has a chart illustrating Summary of Evacuation Time Estimates within the 10-mile EPZ, but nothing in regard to projected traffic capacities of evacuation routes. No page numbers given in cross reference General Plan, Page 37.
J.10.j.		ADEQUATE.
	FEMA	Risk parish responsibility for law enforcement with State Police assistance. Basic Plan, Page 67.
	ANL	Same remarks as FEMA.
	DOE	Same remarks as FEMA.
J.10.k.		INADEQUATE.
	FEMA	Potential impediments along main evacuation routes will be implemented according to Parish Enclosures. Implementing procedures were not available for review. Basic Plan, Page 66.
J.10.l.		ADEQUATE.
	FEMA	General Plan, Page 37, provides a chart illustrating "Summary of Evacuation Time Estimates" within the 10-mile EPZ. Cross reference should be Page 37, not Page 71.
J.10.m.		ADEQUATE.
	FEMA	Basic Plan covers basis for the choice of recommended protective actions from the plume exposure pathway. Page 64.
	EPA	As noted in previous comments, EPA Protective Action Guides are used as a starting point in choosing recommended protective actions, with judgment of responsible officials a strong modifying influence, depending on actual conditions. Chap. 7 Tab provides vital information on sheltering, to assist the decisionmakers.
	NRC	Will use EPA's Protective Action Guides as a basis for recommending protective actions. In addition, LNED will take other factors into consideration in making choice between evacuation and sheltering. Plans do consider protection afforded by housing.

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FDA

Chapter 7, II D, Page 64, states EPA Protective Action Guides referenced in Chapter 6 will be used.

1. Chapter 7, Pages 71-72, provides technical basis for recommending sheltering or evacuation as a protective action.
2. Attachment 3, River Bend, Page 37, gives summary of evacuation time estimates for (10 mile) EPZ.

J.11

ADEQUATE.

FEMA

Plan provides information requested concerning protective measures to be used for the ingestion pathway. On Page 84, plan states that LNEP is responsible for development and maintenance of a mapping and supporting documentation program for the ingestion exposure pathway EPZ. Pages 73-85.

EPA

Protective actions are generally given, and are appropriate. As recommended in our previous comments, we still believe that detailed information on any water supply or treatment plants should be a part of the plan.

NRC

LNEP insures the availability of maps and lists detailing key land use for the ingestion exposure pathway EPZ around each facility to the State EOC, Risk Parishes, LA Department of Agriculture, etc. These maps and lists will include major dairies and food processors along with information on farming in the EPZ.

FDA

Protective measures for ingestion pathway are in Chapter 8, Pages 73-85.

J.12.

ADEQUATE.

FEMA

Means for registering and monitoring of evacuees at relocation centers. Arrangements will be made to perform decontamination surveys and procedures within twelve hours of the completion of the evacuation. Page 88.

EPA

Noted to be a responsibility of the Parish. BP Chap. 9, IV.B, details Parish Support provisions, if needed.

Decontamination Survey Procedures included in the previous draft of the BP as Chap. 9 Tab 2, have been deleted from the present plan, along with survey forms, Tab 3.

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K.3.a.

ADEQUATE.

FEMA
LNED responsibility, with resource requirements, presented to LOEP. Provides for distribution of both self-reading and permanent dosimeters. Cross reference should be Page 90, not Page 88.

NRC
Each emergency worker will receive two self-reading dosimeters and one permanent recording device (film badge or TLD). LOEP is responsible for providing dosimeters. LNED is responsible for providing TLDs.

DOE
It is not clear from either of these two references whether the 24/hr/day capability exists for determining the doses to emergency workers. However, the LNED publicly has that capability.

EPA
Responsibility assigned to LNED (Chap. 9), and procedures are listed in Chap. 9 Sec. V.

K.3.b.

INADEQUATE.

FEMA
Implementing procedures not available for review.

DOE
No implementing procedures. Attachment 3, Page 17, #3, states that "emergency workers will record their dosimeter readings routinely" but it does not indicate the appropriate frequency.

NRC
LNED is responsible for reading TLDS and maintaining dose records. I presume that training program will address the need to read self-reading dosimeters at appropriate frequencies.

ANL
The time interval at which dosimeters should be read and the readings recorded should be stated.

EPA
Chap. 9 Tabs 5 and 6 of the previous draft BP contained excellent detailed procedures and records for monitoring of emergency worker doses, but these tabs have been eliminated in the present draft. Presumably these will be incorporated in the implementing procedures if they are ever finalized.

K.4.

ADEQUATE.

FEMA
Plan does provide the decision chain for authorizing emergency workers to incur exposures in excess of the EPA PAC's. Authorization to exceed the limit will be obtained from the ASOEA. Basic Plan, Page 92.

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EPA No methods for tracking of overexposed emergency workers could be found. In our previous comments we suggested instructions on the Dosimeter Report Form as one way to meet this NUREG-0654 requirement. This Form, however, is now a part of the implementing procedures, which are not available.

DOE Same remarks as FEMA.

ANL Same remarks as FEMA.

K.5.a.

ADEQUATE.

FEMA Specifies action level for decontamination at 0.1. mR/hr. Basic Plan, Page 88.

EPA Action levels are given in BP Chap 9, Sec. IV.B.3 and IV.D. In IV.D.2.b., we recommend that "contamination" be defined here, e.g., 2X natural background, since without quantification it would seem that all vehicles would be subject to impoundment, depending on the sensitivity of the radiation detector used, and the judgment of the surveyor. No action levels could be found for external contamination of vehicles.

DOE Adequate. More detail would be helpful.

NRC State plan meets this criterion. Establishes .1 mr/hr as the point above which decontamination is required.

L.5.b.

INADEQUATE.

FEMA Means for decontamination specified in implementing procedures not available for review. Means for waste disposal not addressed. Cross reference should include implementing procedures and page numbers. Basic Plan, Page 91.

EPA Decontamination procedures present in the previous draft we reviewed have been deleted in the present draft. BP Chap. 9, Sec. V.C., indicates these procedures will be performed at reception or decontamination centers, "per implementing procedures" which, of course, are not available for review.

NRC State plan provides for this.

M.1.

ADEQUATE.

FEMA Seven selected hospitals have procedures in place for dealing with medical emergencies involving radiation. A list of hospitals is given on Page 101.

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	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
	DOE	Letters of Agreement listed in Enclosures.
	NRC	Local and backup hospital and medical services are provided for.
L.3.		INADEQUATE.
	FEMA	Inadequate. The list does not include the type of facility, capacity, and any special radiological capabilities. Also, the cross reference should be Page 101. Incorrect cross reference, Pages 98-100.
	NRC	A list is in the plan, but it is not complete. Capacities, special radiological capabilities, etc., are not included. More information was available in State Plan, Revision 4.
	ANL	The hospital's capacity for accommodating radiation patients should be included.
L.4.		ADEQUATE.
	FEMA	Parish offices of emergency preparedness will coordinate response of emergency medical services to provide emergency medical transportation for all affected persons not covered under the facilities EMAP. A list of ambulance services is available on Page 98, which will provide transportation services for radiological accident patients. Page 96.
	ANL	Same remarks for FEMA.
M.1.		ADEQUATE.
	FEMA	LNED makes recommendation to ASOEA. Refers to Ch. 8, Protective Response, for Ingestion Pathway. Pages 102-104.
	DOE	Same remarks as FEMA.
	EPA	Criteria to relax protective actions are the same as the trigger levels (BP Chap. 8 III.G). Protective actions will be relaxed by the ASOEA based on the LNED Administrator's recommendations (Chap. II, III.A).
	FDA	General plans for recovery and reentry are described adequately, Pages 102-104.

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M.3.

ADEQUATE.

FEMA

Any change in the State organizational structure affecting recovery will be communicated through established channels to involved agencies and organizations. Basic Plan, Page 103.

USDA

Recommendations affecting ingestion exposure pathway will be communicated by the Louisiana Department of Agriculture, the Louisiana Agriculture Emergency Board, and its established USDA network.

ANL

Same remarks as FEMA.

M.4.

ADEQUATE.

FEMA

Plan states that LNEP will periodically estimate dose rate, projected exposure time, and population in plume. Basic Plan, Page 104.

FDA

The population exposure will be calculated by including dose rate exposure time and population. Page 104.

DOE

It says it will be done, but little detail is given to establish a method.

EPA

No reference could be found for methods of estimating population exposures.

N.1.a.

ADEQUATE.

FEMA

Plan describes the exercises and drills that will be implemented as required by FEMA and NRC rule.

DOE

Same remarks as FEMA.

FDA

Exercises will be conducted as set forth in NRC and FEMA rules, Pages 111-112.

ANL

Same remarks as FEMA.

NRC

This section is adequate. However, I must note that an exercise frequency of every other year has not yet been approved by NRC. A proposed rule that would accomplish this is still pending.

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N.1.b.

ADEQUATE.

FEMA

Exercises will include mobilization of State and local personnel and resources adequate to verify their capabilities to respond to an accident scenario. Also, all other scenario requirements are covered in the plan. Basic Plan, Pages 111 and 112.

NRC

The remainder of the criteria dealing with exercises and drills adequately addressed in the state plan.

DOE

Same remarks as FEMA.

ANL

Same remarks as FEMA.

N.2.a.

ADEQUATE.

FEMA

Plan covers the communications drill requirements. Basic Plan, Page 112.

NRC

Adequately addressed.

DOE

Same remarks as FEMA.

ANL

Same remarks as FEMA.

N.2.d.

ADEQUATE.

FEMA

Plan covers the requirements for Radiological Monitoring Drills. Basic Plan, Page 113.

EPA

Addressed in BP Chap 13, Sec. IV.B., as noted in previous comments; additional details, such as might appear in the missing implementing procedures, are needed.

DOE

Same remarks as FEMA.

ANL

Same remarks as FEMA.

N.2.e.

ADEQUATE.

FEMA

Plan covers the Health Physics Drill requirements. Note that cross reference should be IV.C. instead of IV.B. Page 113.

DOE

Same remarks as FEMA.

EPA

Addressed in BP Chap. 13, Sec. IV.D. As noted in previous comments, additional details, such as might appear in the missing implementing procedures, are needed.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
N.3.a.		ADEQUATE.
	FEMA	Objectives will be part of each drill and exercise. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
N.3.b.		ADEQUATE.
	FEMA	Scenarios will include dates, time period, place(s), and participating organizations. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
N.3.c.		ADEQUATE.
	FEMA	Scenarios will include simulated events. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
N.3.d.		ADEQUATE.
	FEMA	Scenarios will provide time schedule of real and simulated initiating events. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
N.3.e.		ADEQUATE.
	FEMA	Scenarios will include a narrative summary describes certain events. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
	DOE	Same remarks as FEMA.
N.3.f.		ADEQUATE.
	FEMA	Scenarios will include a description of the arrangements for advance materials to be provided to official observers. Basic Plan, Page 113.
	ANL	Same remarks as FEMA.
	DOE	Same remarks as FEMA.

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.4.

ADEQUATE.

FEMA

Official observers from Federal, State, and local governments will evaluate the exercise and provide post-exercise critiques, etc. Basic Plan, Page 112.

EPA

Covered adequately in BP Chap. 13, Sec. III.

USDA

State, Parish, and Federal representatives will observe and critique full-scale exercises.

NRC

I find adequate all of the plan elements dealing with training. If carried out, I would expect a comprehensive training program based on my review of the state plan.

FDA

A critique will be conducted and formal evaluation by FEMA; LNED will conduct thorough review of the plan and coordinate revision of the plan and/or implementing procedures. Page 112.

1.5.

ADEQUATE.

FEMA

LNED will conduct a thorough review of the Plan, based on the Federal evaluations, and will coordinate revision of the Plan and/or implementing procedures as deemed appropriate and necessary to resolve deficiencies. Basic Plan, Page 112.

DOE

Same remarks as FEMA.

FDA

A critique will be conducted and formal evaluation by FEMA; LNED will conduct thorough review of the plan and coordinate revision of the plan and/or implementing procedures, Page 112.

0.1.

ADEQUATE.

FEMA

LNED, in conjunction with LOEP, will provide general and specific training for both workers and coordinators; annual retraining; and mini-training more frequently (4-hour programs); also, authority to send representatives to EMI RERP courses. Basic Plan, Pages 105-110.

FDA

Federal, State, and local training will be provided to all response personnel, Pages 105-110.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
0.1.b.		ADEQUATE.
	FEMA	Training to all emergency response personnel will be provided by LNED in conjunction with LOEP. Basic Plan, Pages 105 and 106.
	ANL	Same remarks as FEMA.
0.4.a.		ADEQUATE.
	FEMA	Training will be offered to Directors and Coordinators of the response organizations. Basic Plan, Pages 105 and 106.
	EPA	Training requirements for directors and coordinators were spelled out in detail in Chap. 12 of the previous draft but are missing from the present draft, which makes no explicit mention of training requirements for directors and coordinators.
	ANL	Same remarks as FEMA.
0.4.b.		ADEQUATE.
	FEMA	Training will be offered to personnel responsible for accident assessment. Basic Plan, Pages 105 and 106.
	EPA	Covered in BP Chap. 12, Sec. III. B.1., 2., but no retraining provisions were found.
	ANL	Same remarks as FEMA.
0.4.c.		ADEQUATE.
	FEMA	Training will be provided radiological monitoring teams and radiological analysis personnel. Basic Plan, Pages 105 and 106.
	EPA	Covered in BP Chap. 12, Sec. III.B.1.,2., but no retraining provisions were found.
	ANL	Same remarks as FEMA.
0.4.d.		ADEQUATE.
	FEMA	Training will be offered police, security, and fire fighting personnel. Basic Plan, Pages 105 and 106.
	ANL	Same remarks as FEMA.

<u>NUREG-0654</u>	<u>AGENCY</u>	<u>EXPLANATION/REMARKS</u>
O.4.f.		ADEQUATE.
	FEMA	Training will be offered first aid and rescue personnel. Basic Plan, Pages 105 and 106.
	ANL	Same remarks as FEMA.
O.4.h.		ADEQUATE.
	FEMA	Training will be offered medical support personnel. Basic Plan, Pages 105 and 106.
	ANL	Same remarks as FEMA.
O.4.j.		ADEQUATE.
	FEMA	Training will be provided for personnel responsible for transmission of emergency information and instructions. Basic Plan, Pages 105 and 106.
	DOE	Same remarks as FEMA.
O.5.		ADEQUATE.
	FEMA	Adequately addresses initial and annual retraining. Cross reference should be corrected to "A."5.,6., instead of "B,"5.,6. Basic Plan, Page 106.
	DOE	Same remarks as FEMA.
P.1.		ADEQUATE.
	FEMA	Designated persons to attend FEMA/DOE courses (state and parish representatives). Basic Plan, Page 107.
	DOE	Same remarks as FEMA.
P.2.		ADEQUATE.
	FEMA	ASOEA has the authority and responsibility for radiological emergency response planning. The LNED Administrator is the alternate individual in charge. Basic Plan, Page 15.
	DOE	Same remarks as FEMA.

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P.3.

INADEQUATE.

FEMA

Plan did not have implementing procedures available for review. However, on Page 17, plan did state that an individual, by title, would be designated who would be in charge of emergency response for each department of State Government, but the designated individual and title were not found in plans. There was only a listing of sixteen State agencies and a description of their responsibilities. Should include page number for attachments and implementing procedures.

DOE

Adequate for major state organizations, but no implementing procedures.

P.4.

ADEQUATE.

FEMA

LNED will conduct an annual review of the Plan and related agreements and update or certify the Plan to be current. The update will take into account all deficiencies resulting from drills, exercises, and inter-agency coordination. Basic Plan, Page 26.

DOE

Same remarks as FEMA.

NRC

State plan meets this criterion.

P.5.

ADEQUATE.

FEMA

LNED will be responsible for providing all organizations with changes to the plans and revised pages will be dated and marked to show where changes have been made.

LNED will required return acknowledgement sheet so that certification of changes made is noted. Basic Plan, Page 26.

DOE

Same remarks as FEMA.

P.6.

ADEQUATE.

FEMA

Plan includes a list of supporting documents: 6 supporting plans; 1 Southern Mutual, 2 Federal, 3 site-specific. Basic Plan, Page 30.

NRC

State plan meets this criterion.

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P.7.

ADEQUATE.

FEMA

Plan includes an appendix listing. The listing gives the title and chapter or section of plan to be implemented by the procedure. Basic Plan, Pages 28 and 29..

NRC

State plan meets this criterion.

P.8.

ADEQUATE.

FEMA

Adequate, but some errors in cross referencing noted; difficult to cross reference; no page numbers for attachments. Pages i. through ix.

ANL

Same remarks as FEMA.

P.10.

INADEQUATE.

FEMA

No implementing procedures available to review for compliance. Should reference implementing procedures by page numbers.

RIVER BEND STATION
LOUISIANA GENERAL AND PARISH RADIOLOGICAL EMERGENCY RESPONSE PLANS

December 1983

RAC CONSOLIDATED COMMENTS

CODE: GP = General Plan
EBR = East Baton Rouge Parish
EFEL = East Feliciana Parish
PCO = Pointe Coupee Parish
WBR = West Baton Rouge Parish
WFEL = West Feliciana Parish

NOTE: No page numbers were listed in cross reference in the entire plans.

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CROSS REFERENCE

AGENCY REMARKS

A.1.a.
ADEQUATE

GP: Forward
EBR: Sec D, ppI-4 to I-13
EFEL: II-D, pp4-13
PCO: III-D, pp4-14
WBR: IV-D, pp4-12
WFEL: V-D, pp4-12

FEMA - All Parish plans identify organizations with overall response assignments. Cross reference should show Parish plan page numbers..

ANL - Same remarks as FEMA.

A.1.b.
ADEQUATE

GP: Secs I-IV,C.D.E.,
pp4-5
EBR: I-3,I-17,Sec C.D.E.
EFEL: II-3,C.D.E.
PCO: III-3 to 17
WBR: IV-3 to 15,C.D.E.
WFEL: IV-3 to 15,C.D.E.

FEMA - General reference to concept and relationship in all Parish plans.

ANL - Same remarks as FEMA.

A.1.c.
ADEQUATE

GP: p27
EBR: I-15
EFEL: II-14
PCO: III-15
WBR: IV-13
WFEL: V-13

FEMA - All Parish plans provide block diagram in each, illustrating interrelationships among organizations.

ANL - Same remarks as FEMA.

A.1.d.
INADEQUATE

GP:
EBR: I-3,C.
EFEL: II-3
PCO: III-3
WBR: IV-3
WFEL: V-3

FEMA - EBR: Needs title for State Police (Troop H), Page I-13
EBR: Needs title for EBR Recreation and Park Commission, Page I-14
EFEL: Needs title for State Police (Troop A), Page II-12
PCO: Needs title for State Police (Troop K), Page III-13
WBR: Needs title for State Police (Troop A), Page IV-11
WFEL: Needs title for State Police (Troop A), Page V-11

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CROSS REFERENCE

A.1.e.
ADEQUATE

GP:
EBR: P., I-17
EFEL: I-16E
PCO: III-17E, 20
WBR: IV-15
WFEL: V-15

A.2.a.
ADEQUATE

GP: Appendix A, Tab Ap-A1,
pp8-11
EBR: I-1,2,4,16A.B.D.,D-2
EFEL: II-4,15
PCO: III-3
WBR: IV-2,3
WFEL: V-3,4,5,6,7-12

AGENCY REMARKS

FEMA - EBR: 24-hr per day coverage after emergency classification. Provides primary, secondary, third line coverage
EFEL: Provides 24-hr with primary, secondary, and third means.
PCO: 24-hr coverage, 3 degrees of responsibility.
WBR: Addresses 24-hr coverage and level of notification means.
WFEL: 24-hr coverage by combined shifts St. Frances Vol F.D. and Parish Jail.

ANL - Same remarks as FEMA.

FEMA - Each Parish plan provides for a table with primary and support responsibilities using the agency as one axis and the function as the other. However, as noted in Element A.1.d., not all titles are given for all organizations. No mention in Parish plans of who has authority to request Federal assistance.

EPA - Parish plans also assign responsibilities to organizational entities, but generally identify, in the same sentence, the individual by title, responsible for directing the organization. This almost (but not quite, in our opinion) meets the requirement of NUREG-0654.

DOE - Adequate.

NRC - Parish plans meet this planning criterion. Plan includes a commendable description of responsibilities of various local governmental entities.

USDA - EBR: Figure D-1, Organizational Chart, includes Parish Extension Service; Figure D-2, Emergency Function and Responsibility Matrix, includes the responsibilities of the Parish Extension Service.

WFEL: Parish will coordinate its emergency response through its Civil Defense Director. Parish receives support and technical analysis from LNE. Responsibilities of Parish Extension Service are outlined; Figure D-1, Parish Organizational Chart (includes Parish Extension Service); Figure D-2, Emergency

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CROSS REFERENCE

AGENCY REMARKS

A.2.b.
ADEQUATE

GP: Sec I.A., p.1,
.Attachment
EBR: I-2
EFEL: II-1
PCO: III-2
WBR: IV-2
WFEL: V-2

A.3.
INADEQUATE

GP: (Enclosures)
EBR: I-32
EFEL: II-31
PCO: III-33
WBR: IV-28
WFEL: V-30

(USDA) - EFEL: Parish will coordinate its emergency response through its Civil Defense Director. Parish receives support and technical analysis from LNEC; responsibilities of Parish Extension Service are outlined; Figure D-1, Parish Organizational Chart (includes Parish Extension Service).
PCO: Parish will coordinate its emergency response through its Civil Defense Director. Parish receives support and technical analysis from LNEC. Responsibilities of Parish Extension Service are outlined. Figure D-1, Organizational Chart (includes Parish Extension Service). Figure D-2, Emergency Function and Responsibility Matrix (includes Parish Extension Service).
WBR: Parish will coordinate its emergency response through its Civil Defense Director. Parish receives support and technical analysis from LNEC. Responsibilities of Parish Extension Service are outlined. Figure D-1, Parish Organizational Chart (includes Parish Extension Service).

FDA - Functions and responsibilities located in Enclosures, I-V, Sections A, B, and D.

FEMA - All Parish plans provide for the legal basis for such authorities.

FDA - Legal basis for authorities referenced in Section B.

ANL - Same remarks as FEMA.

FEMA - Not all letter of agreement have been signed. Plans only list a few nongovernmental agencies for which agreements have been signed (reference Appendix I-1). Also, no signature pages.

USDA - Listing of MOUs published. Figure D-2, Emergency Function and Responsibility Matrix (includes Parish Extension Service).

ANL - Letters of agreement are not included.

EPA - No letters of agreement are included as part of the Plan, although listings of letters of agreement are included (Chap. 14, Tab of

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CROSS REFERENCE

AGENCY REMARKS

A.4.
ADEQUATE

GP: (none)
EBR: I-4,D.
EFEL: II-4
PCO: III-4
WBR: IV-4,9.
WFEL: V-4,D.

FEMA - All Parish plans state that continuity of resources to support emergency operations for a protracted period is the responsibility of the local organizations. The title of that individual at the local level is the Mayor-President of the Parish government or the Civil Defense Director.

DOE - Same remarks as FEMA.

C.1.c.
INADEQUATE

State Plan, Section VII,
A.4, Page 25

FEMA - FEMA is noted in plans as being the lead agency and would be responsible for logistical support, telephone lines, radio frequencies, etc., in working in coordination with State and local government agencies.

There should be a statement in the plan that would insure that certain resources would be available to support the Federal effort. Page 25.

C.2.a.
ADEQUATE

GP: (none)
EBR: I-18
EFEL: II-17, E.3.
PCO: III-18, E.3.
WBR: IV-16, E.3.
WFEL: V-16, E.3.

FEMA - Parish plans do state that a parish representative may be dispatched to the RBS EOF.

NRC - Parish plans provide that the Civil Defense Directors may dispatch a representative to the EOF if the situation warrants it.

C.4.
INADEQUATE

GP: (none)
EBR: I-32,33
EFEL: II-4,14
PCO: III-4,14
WBR: IV-D, pp4-12
WFEL: V 4-12

FEMA - EBR: Lists of LOA's; no signed LOA's, only listings.
EFEL: Letter submitted by Parish noting that LOA's not yet in place.
PCO: Same as for other local plans; App.I-1 lists only names of LOA's.
WBR: Appendix I-1, P.IV-28 only names of signers of LOA's.
WFEL: Only as covered in II.A.2.a., Appendix I-1, p.30, only listing of signers of agreements.

NRC - Parish plans include a list of agreement letters with local supporting agencies and organizations. Do these letters of agreement exist? Even if they are not made part of the plans, there should be a mechanism for FEMA/RAC review.

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& EVALUATION

CROSS REFERENCE

AGENCY REMARKS

D.3.
ADEQUATE

GP: III A., p.7,
Tab A-1, pp8-9

ANL - Inadequate. The references make no mention of the Southwestern Mutual Radiological Assistance Plan, but it is, however, mentioned in the State plan. Neither is there any mention of nuclear power facilities or of any other organizations or individuals who can be relied upon for support.

FEMA - All Parish plans provide for the establishment of an emergency classification and emergency action level scheme consistent with the utility.

NRC - Parish plans meet this criterion.

FDA - Emergency Classification system is in General Plan, Section III.A. and Tab A-1.

D.4.
ADEQUATE

GP: III.A., p.7
EBR: I-17-19, E.
EFEL: II.E., pp16-18
PCO: III. 17-19
WBR: IV, p15-17
WFEL: V, p15-17

FEMA - ECL's to be sent in initial and all follow-up messages to local. Notification from RBS control room to Parish warning point Section E provides details of notification and activation consistent with emergency classification system.

ANL - Same remarks as FEMA.

FEMA - All Parish plans contain chart and lines of notification and response, verification forms, paging system.

USDA - Utility will notify Parish on RBS emergency hotline. (24-hour day coverage.)

NRC - Parish plans state that parishes will be notified "once an emergency classification has been declared at RBS." This more closely approximates the intent of NRC's licensee requirements.

FDA - Procedures for accident notification located in General Plan, Appendix A, and Enclosures, Section E.

E.1.
ADEQUATE

GP: App A, Tab Ap-A1,
pp27-29
EBR: Sec E, ppI-17
EFEL: Sec II-16-17
PCO: Sec E, III-15-17
WBR: Sec E, ppIV-15-16
WFEL: Sec E, ppV-15

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CROSS REFERENCE

AGENCY REMARKS

E.2.
INADEQUATE

GP: (none)
EBR: I-18,22, F.6.,
App I-3, p35
EFEL: II-18,19, F.6.,
App I-3, p33
PCO: III-17, F.6.,
p22, III-36
WBR: IV-16, E.1.,
p16, IV-30, F.6.
WFEL: V-15, E.1., F.6.,
V.20

FEMA - Parish plans do describe the notification and activation, but specific internal procedures for each organization were not available for review. A listing of implementing procedures was given in Appendix I-3. Implementing procedures not included for review.

DOE - Implementing procedures not included.

NRC - Parish plans provide for notification, but details are in implementing procedures. Do they exist?

ANL - Same remarks as FEMA.

E.5.
ADEQUATE

GP: III.B., p10-11
EBR: I-3, C,E,F,7.,
pp18, 19, 22
EFEL: II-3, 18, 22, E-5,
F-7
PCO: I-3, p19
WBR: IV-3,17; C., E-5,
F.7, p20
WFEL: V-3,17,20 (C,E,F.6)

FEMA - An established system for disseminating to the public appropriate information from the utility and to the appropriate EBS radio stations exist in all plans. CDD initiates procedures for notification; President of Police Jury notifies CD to activate notification system. Cross references show F.7., should be F.6.

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

E.6.
ADEQUATE

GP: (none)
EBR: ppI-22,26,27
EFEL: ppII-21,25
PCO: ppIII-22,26,27,
F.7., p22
WBR: ppIV-20,22,23, F.7.
WFEL: ppV-20,24,25,
F.6., G.

FEMA - All Parish plans do establish administrative and physical means for notifying and providing prompt instructions to the public within the 10-mile EPZ. However, need to include other cross references. Need to add: Section III.A., Tab A1; Section III.B., Tab B1; Appendix A, Tab A1.

DOE - Same remarks as FEMA.

NRC - Plans provide that the Prompt Notification System will be activated from the Parish EOCs. System will utilize a combination of sirens and special notification devices for some facilities. Decision on alerting public will be made by Parish officials.

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AGENCY REMARKS

E.7.
INADEQUATE

GP: III.B., pp10-32

FEMA - Parish plans did not include written messages intended for the public consistent with the licensee's classification scheme. There is only a listing of those EBS messages on Page 12 of General Plan. Need to add Tab Ap-B1 (page 32).

FDA - "EBS" Message Listing, Section III.B., Tab B1. Actual messages to be developed as part of the implementing procedures, will be included with them.

NRC - Inadequate. Written messages for the public are not included in the plans.

F.1.a.
ADEQUATE

GP: (none)
EBR: I-20,21, F.1.,
F.2.
EFEL: ppII-19,20; F.1.,2.
PCO: ppIII-20,21 (Sheriff's
Office)
WBR: ppIV-18,19, F.1.,2.
WFEL: ppV-18,19, F.1.,2.

FEMA - A 24-hour per day notification and the use of a dedicated telephone system exists in all parishes.
EBR: Emergency Medical Services
EFEL: Clerks Office in Jackson Town Hall
PCO: Dispatcher's Office in Jackson City, P.D.
WBR: Sheriff's Office
WFEL: Manned by Fire Department and Parish Jail

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

F.1.b.
ADEQUATE

GP: (none)
EBR: I-20,21, F.1.,
F.2.
EFEL: ppII-19,20; F.1.,2.
PCO: ppIII-20,21
WBR: ppIV-18,19, F.1.,2.
WFEL: ppV-18,19, F.1.,2.

FEMA - Parish plans do provide for communications with contiguous State/local governments within the EPZ.

ANL - Same remarks as FEMA.

DOE - Same remarks as FEMA.

F.1.c.
ADEQUATE

GP: I.A.7,9, pp4,
App A, Tab Ap-A1

FEMA - Parish plans and State plan do provide for communications as needed with Federal emergency response organizations.

DOE - Same remarks as FEMA.

F.1.d.
ADEQUATE

GP: (none)
EBR: P. I-20
EFEL: ppII-19
PCO: ppIII-20
WBR: ppIV-18
WFEL: ppV-18

FEMA - Parish plans and State plan do provide communications between the required locations and agencies.

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

NRC - Plan provides for direct, dedicated

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AGENCY REMARKS

F.1.e.
ADEQUATE

GP: (none)
EBR: ppI-21,22
EFEL: ppII-20,21
PCO: ppIII-21,22,23
WBR: ppIV-19,20,21
WFEL: ppV-19,20

FEMA - Parish plans describe the method for which alerting or activating emergency personnel will be accomplished.

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

F.2.
ADEQUATE

GP: (none)
EBR: pI-21
EFEL: pII-20
PCO: pIII-21
WBR: IV-19
WFEL: V-19

FEMA - A coordinated communication line for fixed and mobile medical support facilities exists.

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

F.3.
ADEQUATE

GP: p22, III, G.,1-4
EBR: P.I-22, #8
EFEL: pII-21, #8
PCO: III-22
WBR: pIV-20
WFEL: V-20, F.7.

FEMA - Periodic testing of the emergency communication system will be conducted on a regularly scheduled basis. Cross reference should include State Plan, Page 112.

DOE - Same remarks as FEMA.

USDA - RBS Emergency Hotline System described. (24-hour coverage.) Communication systems are tested on a regularly scheduled basis.

G.1.
ADEQUATE

GP: pp10-11, III-B

FEMA - General Plan does address all required information as well as an annual review of program.

USDA - Each risk Parish will designate a spokesperson who will release emergency public information to the news media pertinent to its Parish.

FDA - During an incident, all organizational spokespersons will participate in joint media briefings at the designated Media Center.

G.2.
ADEQUATE

GP: Ch. III, B.,
pp10-11

FEMA - General Plan describes how the public information program will disseminate educational material to resident and transient populations. Provides for annual review and update as well as annual dissemination.

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AGENCY REMARKS

G.3.a.
ADEQUATE

GP: pp10-11, III B.,
7,8,9,10

FEMA - General Plan states that the (Police Jury or Mayor) President or his designated PIO will serve as the Parish spokesperson. The news media will be directed to the RBS ECC.

NRC - Parish plans state that Civil Defense Directors will direct news media to River Bend Station Emergency Communications Center. It is not clear, however, that parish-generated information will be available there. Needs clarification.

ANL - Same remarks as FEMA.

G.4.a.
ADEQUATE

GP: pp10-11, Sec III.B.,
Encl. 1-V
EBR: pI-6-7
EFEL: pII-6,7
PCO: pIII-7
WBR: pIV-7
WFEL: pV-6,7

FEMA - General Plan (Page 11) states that the (Police Jury or Mayor) President or his designated PIO will serve as the Parish spokesperson. Each Parish has an appointed PIO.

DOE - Same remarks as FEMA.

NRC - Police Jury President or Mayor-President will serve as spokesperson or will designate PIO.

G.4.b.
ADEQUATE

General Plan: Section III.B.
p11

FEMA - Coordination of all news releases will take place by the PIO through the RBS, ECC at the EOF to disseminate public information.

ANL - Same remarks as FEMA.

G.4.c.
ADEQUATE

General Plan: Sec III.B.10,
p11

FEMA - Rumor control to be coordinated by Parish PIO. Rumor Control Center will be located at GSU headquarters in Baton Rouge. Telephone numbers to be distributed to public.

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

G.5.
ADEQUATE

General Plan: Sec III.B. #2,
p10

FEMA - General Plan (Page 10) states that LNED, LOEP, and RBP will coordinate together in conducting an annual program to acquaint the news media. State plan required attendance of Parish governments on an annual basis.

DOE - Same remarks as FEMA.

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AGENCY REMARKS

H.3.
ADEQUATE

GP: (refers to local plans)
EBR: pI-3
EFEL: pII-3, Sec C.
PCO: III-3
WBR: pIV-3, Sec C.
WFEL: pV-3, Sec C.

FEMA - EBR: 222 St. Louis Street; Baton Rouge
EFEL: Jackson Town Hall, 1610 Charter Street; Jackson
PCO: Parish Courthouse; New Roads, LA
WBR: Parish Courthouse; Port Allen
WFEL: St. Francisville Fire Dept; St. Francisville

DOE - Same remarks as FEMA.

ANL - Same remarks as FEMA.

NRC - EOC's are provided for in each parish plan.

H.4.
INADEQUATE

GP: (refers only to Enclosures)
EBR: pI-18
EFEL: pII-17
PCO: III-18
WBR: pIV-15
WFEL: pV-16

FEMA - Parish plans do address activation and staffing according to established procedures. However, no implementing procedures are available for review.

NRC - Parish plans provide for key people to be notified at designated emergency classifications. Difficult to determine adequacy, however, without seeing detailed implementing procedures.

DOE - Procedures should be detailed in implementing procedures.

ANL - Implementing procedures are still being developed.

H.7.
ADEQUATE

GP: State Plan, Ch. 6, III.A.2 & Tab 3 & Tab 3, Table 1, pp49 & 55-60

FEMA - State plan covers this element since the State of Louisiana is responsible for off-site radiological field monitoring. Cross reference to State plan is incorrect. Should be Chapter 6, III.A.2 (Page 49), Tab 3 (Pages 55-57), and Tab 3, Table 1, (Pages 58-60).

DOE - Adequate, but reference incorrect.

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AGENCY REMARKS

H.10.
ADEQUATE

GP: p17, Sec III.E.5.

EPA - BP Chap. 6, Tab 3, Table 1, lists the needed equipment. If EPA recommended dose limits to emergency workers are to be used, as stated in BP Chap. 6, Tab 1, then 0-200 mR pocket dosimeters may not be sufficient. Higher range dosimeters will be needed to monitor worker exposures when they exceed 200 mR per task, and should be available. We note also that in BP Chap. 9, V.B., both high and low range dosimeters are to be provided emergency workers. Emergency sampling procedures are outlined in BP Chap. 6, Tab 4. The plan anticipates using in-house data processing and computer capabilities, with calculation to be performed at LNED (BP Chap. 6).

NRC - Parishes assume no responsibility for offsite monitoring. They do maintain equipment for other purposes, however, such as monitoring for contamination at reception centers.

FEMA - General Plan (Page 17) states that provisions have been made for inspection, inventory, etc., concerning radiological equipment.

NRC - Parish plans provide for inspection, inventory, and functional checks quarterly and after use. What about calibration? Who is responsible for seeing that it's done at an appropriate interval.

ANL - Same remarks as FEMA.

H.11.
INADEQUATE

GP: Tab F-1, p19
(State Plan, pp58-60)

FEMA - Incomplete equipment list provided in General Plan, Page 19. No communications equipment shown. Cross referencing should include State Plan, Pages 58-60.

EPA - BP Chap. 6, Tab 3, Table 1, lists required equipment, and the sampling supplies list is now labeled as comprised of "three identical kits," although the kits will apparently not include radiation instrumentation which will need to be collected (and the time invested to do this). Instructions for monitoring instruments, and check sources, are still not included in the kits.

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(EPA) - Kits no longer are to contain personal dosimeters and chargers which are now listed with portable instrumentation. This change seems ill-advised, unless the personnel monitoring equipment is to be placed in separate kits for ready availability.

Kits should contain forms for recording worker dosimeter readings.

NRC - Tab F-1 lists resource requirements for radiological exposure control. Is this equipment actually available? Where is it kept?

ANL - Although dosimeters and survey equipment are not listed separately in an appendix, they are listed in Attachment 3, Tab F-1. However, no communications equipment or emergency supplies are listed.

H.12.
ADEQUATE

GP: (refers to State Plan, Ch. 6, Tab 3.A.E, p55)

FEMA - Central point for receipt and analysis of field monitoring data and coordination of samples will be the Field Response Center at the River Bend EOF.

FDA - This is in the State Plan; will not be the responsibility of the local agencies.

DOE - Same remarks as FEMA.

I.7.
ADEQUATE

GP: (State Plan, Ch. 6, Tab 3, pp55-60)

FEMA - State Plan describes the field monitoring operational methods, procedures, and equipment. However, cross reference is incorrect (no Tab 5 or 7 in Chapter 6).

DOE - Same remarks as FEMA.

EPA - BP Chap. 6, Tab 3, reflects capability for field monitoring within the plume exposure EPZ.

I.8.
ADEQUATE

GP: III.C., p13

FEMA - General Plan states that Accident Assessment is the responsibility of LNEP, but Parishes are expected to carry out protective response measures based on the recommendations from LNEP.

DOE - This element is adequate.

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AGENCY REMARKS

J.2.
ADEQUATE

WFEL: pV-25, G.3.

FEMA - West Feliciana Parish Plan states that primary means of evacuating residents, transients, and industrial workers (including River Bend Station) from the 10-mile EPZ will be by private vehicle.

ANL - Same remarks as FEMA.

J.9.
ADEQUATE

GP: III-C, p13
EBR: I-26, G
EFEL: II-25
PCO: III-26
WBR: IV-22
WFEL: V-24

FEMA - General and Parish Plans state that Parishes will carry out protective response measures based on recommendations from LNED.

EPA - As detailed in our previous comments, protective response arrangements are adequate.

FDA - The capability for implementing protective measures is in the General Plan, Section III.C. and Enclosures, Section G.

ANL - Element is adequate.

J.10.a.
ADEQUATE

GP: App. B., Tab Ap-B1,
App. D., Tab Ap-D2
EBR: I-29, 29a-29e, G.1.,
G-1.a.
EFEL: ppII-28, G.1.,
II-28a-e
PCO: ppIII-30, 30a-e
WBR: ppIV-25, 25a-e
WFEL: ppV27, 27a-e

FEMA - Appropriate maps are provided in the General Plans with Shelter and Reception Center Maps in the Parish Plans, Page numbers should be given in cross reference for Parish Plan maps as well as maps in the General Plan.

ANL - Element is adequately covered.

J.10.b.
ADEQUATE

GP: pp32,25, App. B.,
Tab Ap-B2, App C,
Tab Ap-C1

FEMA - General Plan includes maps showing population distribution.

ANL - Same remarks as FEMA.

J.10.c.
INADEQUATE

GP: (refers to local
plans only)
EBR: ppI-19,22
EFEL: ppII-18,21
PCO: ppIII-19,22
WBR: ppIV-17,20
WFEL: ppV-17,20

FEMA - Enclosures I-V do not mention transient population. Also, West Feliciana Parish Plans cross reference is F.6, not F.7.

ANL - These references provide for notification of residents, but do not address the means by which transients, vacationers, or other non-residents are to be notified.

J.10.d.
ADEQUATE

GP: Sec. G.3. and H. of
Enclosures
EBR: ppI-28,30

FEMA - Parish Plans state that the CD Director will ensure that a current list of special-need evacuees is available and that

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AGENCY REMARKS

J.10.e. INADEQUATE	GP: Sec. III.E., p16	<u>FEMA</u> - No page numbers; no reference as to where stored; distribution to be made by LNED.
		<u>FDA</u> - In the General Plan, Section III.E.4., states "that arrangement will be made;" this should be done prior to time of accident.
J.10.f. ADEQUATE	GP: Sec III.E.4., p16 & E.5.a(2), p18	<u>FEMA</u> - General Plans include method by which decisions will be made concerning KI (Page 18). Cross reference should include Page 18.
		<u>FDA</u> - K.I. will not be used for the General Population. The Secretary of the L. D. of H. and HR will advise the ASOEA on this matter at the time of the accident; this should be done prior to the accident.
		<u>ANL</u> - All matters regarding administration of KI are covered in the State Plan.
J.10.g. ADEQUATE	GP: p5, Sec 1.a.14 EBR: pI-27, G.3. EFEL: pII-26 PCO: pIII-27 WBR: pIV-23 WFEL: pV-25	<u>FEMA</u> - Transportation by private automobile and car pools if evacuation becomes necessary
		<u>ANL</u> - Same remarks as FEMA.
J.10.h. ADEQUATE	GP: (refers to local plans only) EBR: pI-29a-e EFEL: pII-28a-e PCO: pIII-30a-e WBR: pIV-25a-e WFEL: pV-27	<u>FEMA</u> - Adequate. Parish Plans include list of reception centers and shelters.
		<u>ANL</u> - Same remarks as FEMA.
J.10.i. INADEQUATE	GP: Appendix D., Tab Ap-D1, p37	<u>FEMA</u> - General Plan has a chart illustrating "Summary of Evacuation Time Estimates," (Page 37) within the 10-mile EPZ, but nothing in regard to projected traffic capacities of evacuation routes. No page number given in cross reference, General Plan, Page 37.
J.10.j. ADEQUATE	GP: (refers to local plans only) EBR: I-8, I-26,27 EFEL: II-7, II-13,25 PCO: III-8,13,27 WBR: IV-7,11,23 WFEL: V-7,11,25	<u>FEMA</u> - Determination to limit access to be made by Parish Police Jury President and Mayor; risk Parish has responsibility, with assistance from State Police.
		<u>DOE</u> - Same remarks as FEMA.

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AGENCY REMARKS

J.10.k.
ADEQUATE

GP: (refers to local plans only)
EBR: pI-11, I-28, D.1.j.
EFEL: pII-20,26
PCO: PIII-10,28
WBR: pIV-9,23
WFEL: pV-9,25

FEMA - Parish Plans do address means for dealing with potential impediments.
EBR: Public Works
EFEL: Parish and Jackson Public Works Dept
PCO: Parish Maintenance Department
WBR: Parish Maintenance
WFEL: Department of Roads

ANL - Same remarks as FEMA.

J.10.1.
ADEQUATE

GP: App. D., Tab Ap-D1, p37

FEMA - General Plan does include a "Summary of Evacuation Time Estimates" within the established plume exposure pathway (10-mile) EPZ (Page 37).

ANL - Same remarks as FEMA.

J.12.
INADEQUATE

GP: Sec. III.E.3., p16
EBR: pI-9,12,13
EFEL: pII-9
PCO: pIII-9,12, III-31
WBR: pIV-8
WFEL: pV-8, H.1., pV-28

FEMA - Parish Plans do describe the means for registering and monitoring of evacuees at relocation centers in host areas. However, nothing was mentioned concerning monitoring capabilities to be completed for all residents and transients in the plume EPZ within a 12-hour time period.

EPA - The Parish Plans do not detail how monitoring of evacuees for contamination will be accomplished, and do not reflect that appropriate equipment and supplies have been provided to monitor large numbers of people.

K.3.a.
ADEQUATE

GP: Sec. III.E., p16

FEMA - General Plan describes the provision for determining the doses received by emergency workers and volunteers. Also, provisions have been made for dosimeters, both self-reading and permanent record devices

EPA - Responsibility assigned to LNED (Chap. 9), and procedures are listed in Chap. 9, Sec. V.

NRC - Parish plans provide for this. However, are dosimeters and TLDs there in sufficient quantities for emergency workers? What do local government workers do with TLDs when emergency is over?

DOE - Same remarks as FEMA.

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AGENCY REMARKS

K.3.b.
ADEQUATE

GP: p17, Sec. III.E.

FEMA - Parish plans provide for workers to check dosimeters periodically. Workers are responsible for filling out dosimeter forms and giving them to parish Radiological Defense Officer.

K.4.
ADEQUATE

GP: p17, Sec. III.E.

FEMA - General Plan does establish the decision chain for authorizing emergency workers to incur exposures in excess of EPA PAG's. RBP consults with LNED; RBP Parish President or Mayor authorizes.

EPA - No methods for tracking of overexposed emergency workers could be found. In our previous comments we suggested instructions on the Dosimeter Report Form as one way to meet this NUREG-0654 requirement. This form, however, is now a part of the implementing procedures, which are not available.

DOE - Same remarks as FEMA.

K.5.a.
ADEQUATE

GP: p16, III.E.

FEMA - General Plan does specify action levels at 0.1 mR/hr. for determining the need for decontamination. Surveys to be performed at established Reception Centers. No surveys performed of general population without set up of a reception center.

EPA - Action levels are given in BP Chap. 9, Sec. IV.B.3. and IV.D. In IV.D.2.b., we recommend that "contamination" be defined here, e.g., 2X natural background, since without quantification it would seem that all vehicles would be subject to impoundment, depending on the sensitivity of the radiation detector used, and the judgment of the surveyor. No action levels could be found for external contamination of vehicles.

NRC - State Plan meets this criterion. Establishes 1mR/hr. as the point above which decontamination is required.

DOE - Adequate.

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AGENCY REMARKS

K.5.b.
ADEQUATE

GP: ppl8-19, III.E.

FEMA - General Plan states that arrangements have been made for radiological decontamination of emergency personnel wounds, supplies, instruments, and equipment and for waste disposal.

EPA - Decontamination procedures present in the previous draft we reviewed have been deleted in the present draft. BP Chap. 9, Sec. V.C. indicates these procedures will be performed at reception or decontamination centers, "per implementing procedures" which, of course, are not available for review.

NRC - Parish Plans meet this criterion.

L.1.
ADEQUATE

GP: (refers only to Enclosures)
EBR: pI-30, D.5., H.2.
EFEL: pII-29
PCO: pIII-31
WBR: pIV-26
WFEL: pV-28

FEMA - Parish Plans do describe the hospital arrangements that have been made for taking care of patients who have been exposed to radiation. Injured evacuees will be treated at the Baton Rouge General Hospital and contaminated patients treated at Our Lady of the Lake Regional Medical Center.

DOE - Adequate.

NRC - Each of the parish plans provides for local hospital (Our Lady of the Lakes) handling of injured, contaminated persons. Plans provide that assistance in evaluating uptake and exposure may be obtained from DOE Radiological Emergency Assistance Center, Oak Ridge, Tennessee.

L.4.
INADEQUATE

GP: (refers only to Enclosures)
EBR: pI-10,30
EFEL: pII-29
PCO: pIII-9,31
WBR: pIV-8,26
WFEL: pV-28

FEMA - Four of the five Parish Plans address arrangements for transporting victims. WFEL does not state who will be responsible for transportation. Also, D.l.h. needs to be added to cross reference.
EBR: East Baton Rouge Emergency Medical Services and Our Lady of the Lake M.C.
EFEL: D.l.i., H.2., East Feliciana Parish Rescue Service
PCO: Acadian Ambulance
WBR: Port Allen Rescue and Fire Service
WFEL: No reference as to who will transport

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M.1.
ADEQUATE

GP: p20, III.f.

FEMA - Reentry/recovery procedures will be initiated upon the recommendation of LNED. The reentry/recovery process will be handled by the same agencies and organizations who implemented the protective action.

EPA - Criteria to relax protective actions are the same as the trigger levels (BP Chap. 8, III.G.). Protective actions will be relaxed by the ASOEA based on the LNED Administrator's recommendations (Chap. 11, III.A.).

FDA - Plans for reentry and recovery are very general, General Plan, Section III.F.

DOE - Adequate.

N.1.a.
ADEQUATE

GP: p21, III.G.

FEMA - General Plan addresses the requirements of a REP exercise.

DOE - Adequate.

FDA - Concept of operations for exercises is in General Plan, Section III.G.

NRC - Same comment as that for State plan.

N.1.b.
ADEQUATE

GP: p21, III.G.

FEMA - General Plan covers the requirements of an exercise including a critique and other testing frequencies.

DOE - Adequate.

N.2.a.
ADEQUATE

GP: p22, III.G.

FEMA - General Plan covers the communication drill requirements.

N.2.c.
ADEQUATE

GP: p22, III.G.

FEMA - General Plan covers the requirements concerning medical emergency drills.

NRC - Parish plans meet this criterion.

N.2.d.
ADEQUATE

GP: p22, III.G.

FEMA - General Plan covers the requirements for Radiological Monitoring drills.

FDA - An annual radiological monitoring drill will be held, General Plan, Section III.G.

EPA - Addressed in EP Chap. 13, Sec IV.B., as noted in previous comments, additional details, such as might appear in the missing implementing procedures, are needed.

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N.3.a.
ADEQUATE

GP: p21-22, III.G.

FEMA - General Plan states that the exercise scenario will include basic objectives of each exercise or drill and appropriate evaluation criteria.

DOE - Adequate.

N.3.b.
ADEQUATE

GP: p23, III.G.

FEMA - General Plan states that the exercise scenario will include dates, time period, place(s), and participating organizations.

DOE - Adequate.

N.3.c.
ADEQUATE

GP: p23, III.G.

FEMA - General Plan states that the exercise scenario will include simulated events.

DOE - Adequate.

N.3.d.
ADEQUATE

GP: p23, III.G.

FEMA - General Plan states that the exercise scenario will include a time schedule of real and simulated initiating events.

DOE - Adequate.

N.3.e.
ADEQUATE

GP: p23, III.G.

FEMA - General Plan states that the exercise scenario will include a narrative summary describing the conduct of the exercise.

DOE - Adequate.

N.3.f.
ADEQUATE

GP: p23, III.G.

FEMA - General Plan states that the exercise scenario will include a description of the arrangements for advance materials to be provided to official observers.

N.4.
ADEQUATE

GP: p21, III.G.

FEMA - Arrangements will be made for observation and critique of each exercise by representatives of Federal, State, or local governments.

EPA - Covered adequately in plan.

USDA - State, Parish, and Federal representatives will observe and critique full-scale exercises.

FDA - Critiques and evaluations will be conducted, General Plan, Section III.G.

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AGENCY REMARKS

N.5.
ADEQUATE

GP: p21, III.G.

FEMA - Parish governments, with LNEB and LOEP, will review plans and implementing procedures based on critique and evaluation of exercises.

DOE - Adequate.

O.1.
ADEQUATE

GP: pp24-25, III.H.

FEMA - GUS to provide site specific training. LNEB, with LOEP, will train Emergency Response personnel from Parishes. Also, will train, initially and follow-up, elected officials. Also, RBP will designate Parish personnel to attend Federal training courses.

FDA - Utility, State, and Federal training programs will be provided, General Plan, Section H.

DOE - Adequate.

O.1.b.
ADEQUATE

GP: p24, III.H.2.

FEMA - General Plan addresses the need for training for each off-site response organization. Ambulance, police, fire, etc., will also receive training. Mutual aid organizations not trained by Utility directed programs will be trained by LNEB.

DOE - Adequate.

O.4.a.
ADEQUATE

GP: p24, III.H.

FEMA - General Plan includes training for Director and coordinators.

DOE - Adequate.

NRC - Same comment as that for State plan.

O.4.d.
ADEQUATE

GP: p24-25, III.H.

FEMA - State directed training for sheriffs, deputies, fire fighting who are not trained by a Utility-directed program.

DOE - Adequate.

O.4.f.
ADEQUATE

GP: p24, III.H.

FEMA - General Plan includes training for first aid and rescue personnel.

DOE - Adequate.

O.4.g.
ADEQUATE

GP: p24, III.H.

FEMA - General Plan includes training for local support services personnel.

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AGENCY REMARKS

O.4.h.
ADEQUATE

GP: p24, III.H.

FEMA - General Plan includes training for medical support personnel.

DOE - Adequate.

O.4.j.
ADEQUATE

GP: p24, III.H.2.

FEMA - General Plan includes training for personnel responsible for transmission of emergency information and instructions.

DOE - Adequate.

O.5.
ADEQUATE

GP: p24, III.H.

FEMA - General Plan states that initial and annual retraining will be implemented.

DOE - Adequate.

P.1.
INADEQUATE

GP: H., pp24-25

FEMA - General Plan provides for training for all emergency response personnel, but not for individuals responsible for the planning effort.

P.2.
ADEQUATE

GP: (refers to local plans)
EBR: Sec D.1.a., ppI-4,5
EFEL: Sec D.1.a., pII-4
PCO: Sec D.1.a., pIII-6
WBR: Sec D.1.a., ppIV-4,5
WFEL: Sec D.1.a., ppV-4,5

FEMA - Parish Plans do identify by title the individual with the overall authority and responsibility for radiological emergency response planning.

DOE - Adequate.

P.3.
ADEQUATE

GP: (refers to local plans)
EBR: D.1.c., pI-5
EFEL: D.1.c., pII-5
PCO: D.1.c., pIII-6
WBR: D.1.c., pIV-5
WFEL: D.1.c., pV-5

FEMA - Parish Plans do designate an emergency planning coordinator (CD Director) who will be responsible for developing and updating plans.

DOE - Adequate.

P.4.
ADEQUATE

GP: II.B., p6

FEMA - CDD's to review annually; recommendation made to LNEP, LOEP, and GSU. Revisions to be incorporated and distributed.

NRC - Parish plans meet this criterion.

DOE - Adequate.

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CROSS REFERENCE

AGENCY REMARKS

P.5.
ADEQUATE

GP: II.B., p6

FEMA - CDD's authorized to distribute uncontrolled copies to those responsible for implementation. Also, must maintain current distribution list. LNED responsible for controlled distribution of the Louisiana Peacetime Radiological Response Plan and attachments, as appropriate.

DOE - Adequate.

P.6.
ADEQUATE

GP: App. Tab Ap-G1,
p51

FEMA - General Plan provides a listing of supporting plans and their sources on Page 52 (Appendix G., Tab Ap-G1).

NRC - Parish plans meet this criterion.

P.7.
INADEQUATE

GP: (references local plans)
EBR: App. 1.3, pI-35
EFEL: App. 1.3, pII-33
PCO: App. 1.3, III-35
WBR: App. 1.3, pIV-30
WFEL: App. 1.3, pV-32

FEMA - Listing of RAD Emergency implementing procedures. Does not contain sections to be implemented by each procedure.

P.8.
ADEQUATE

GP: p"v" - ix cross reference

FEMA - Attachment 3 does include a table of contents and cross reference. However, page numbers are needed on all cross references.

P.10.
ADEQUATE

GP: (refers to local plans)
EBR: D.1.c., pI-5
EFEL: D.1.c., pII-5
PCO: D.1.c., pIII-6
WBR: D.1.c., pIV-5
WFEL: D.1.c., V-5

FEMA - Parish plans state that the CD Director have the responsibility of updating telephone numbers in emergency procedures at least quarterly.