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Direct Dial Number

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SNRC-939

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

SUBMITTAL OF REVISION 1 PAGES OF LOCAL OFFSITE
RADIOLOGICAL EMERGENCY RESPONSE PLAN

Dear Mr. Denton:

On May 26, 1983, the Shoreham Nuclear Power Station Local Offsite Radiological Emergency Response Plan, Revision 0 ("the plan") was submitted as part of the Atomic Safety and Licensing Board Docket No. 50-322. Since the submittal of the plan, other events have occurred that have indicated that certain modifications to the plan and procedures are appropriate.

First, the Federal Emergency Management Agency (FEMA) has conducted a review of the plan. A report of FEMA's findings was released on June 23, 1983 and provided an element-by-element rating of the plan. A total of 103 elements were rated, with 69 Adequate and 34 Not Adequate.

Second, the intervenors in the licensing hearings for Shoreham Nuclear Power Station submitted "Consolidated Emergency Planning Contentions" on July 7, 1983. In addition, as part of the discovery process, the intervenors requested clarification of planning items.

Finally, the preparation of Local Emergency Response Organization (LERO) training materials has progressed and LERO training has started. This has involved an in-depth review of the plan and procedures and as a result certain modifications have been identified.

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1. Discussion of Revisions

A. FEMA Comments

The FEMA review of the plan, implementing procedures, and evacuation plan resulted in a finding of 34 Not Adequate ratings. In responding to these 34 elements; 5 required clarification of existing plan references with no revision, 17 were fully corrected through plan revisions, 7 were partially corrected through plan revisions and 5 were not corrected. An element-by-element response to the FEMA comments is presented as Attachment 1 to this document.

B. Contention and Discovery Items

As part of the Shoreham licensing hearings, the intervenors have submitted contentions and requests for discovery materials. Some of these have raised questions for clarification regarding the plan and implementing procedures. These items have been addressed through revisions. Attachment 2 presents a cross reference of 8 revisions and their corresponding contention or discovery items.

C. Training Material Preparation and Plan Implementation

Since the submittal of the plan on May 26, 1983, work has proceeded to implement the activities as described in the plan. This has included the preparation of LERO training materials and the procurement of facilities and equipment. During this work, areas of the plan and implementing procedures have been identified that required the clarification of inconsistencies, inclusion of new information, correction of minor errors, and other refinements. These improvements have been incorporated into this revision of the plan.

D. Extent of Revisions

Implementing the modifications has required revising the plan, implementing procedures, and Appendix A (Evacuation Plan). Of the total number of revisions, fully 75% are very minor and only involve page number changes, shifted text (otherwise unchanged), correction of typographical errors, or single word changes.

2. Instructions for Handling of Revised Pages

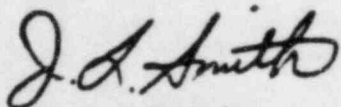
Only revised pages have been sent and all are marked "Rev. 1" with the preparation date in the lower right hand corner. All changed or deleted text is indicated by a vertical bar in the right margin. The Rev. 1 pages should be inserted into the plan in the appropriate places and the

corresponding Rev. 0 pages removed and destroyed. A document sign-off form is included. Please complete this form and return to LILCO as indicated.

The plan will be updated periodically to incorporate new information, FEMA and NRC Staff reviews, and suggestions from planning personnel as they work with the plan.

Should you have any questions, please contact this office.

Very truly yours,



J. L. Smith
Manager, Special Projects

Attachments

cc: Mr. J. Higgins
All Parties Listed in Attachment 3

JH/cl

Attachment 1

Responses to FEMA Findings

Note: Numbers correspond to numbers used in FEMA findings.

A.1.a Action: Text added to pg. 1.4-1, 1.4-2, 1.4-3 to describe relationship of State, County and LERO.

Text added to pg. 3.6-5 regarding the ordering of Selective Sheltering and Selective Evacuation.

Clarification: The LERO plan is not intended to supplant the Radiological Emergency Preparedness Plan (REPP). However, if New York State should choose not to implement its REPP, the LERO plan does provide for those responses that the State would normally provide such as ingestion pathway protective action recommendations. Suffolk County participation is further provided for in OPIP 3.6.3, Traffic Control, which provides for the participation of County or other police at traffic control points.

A.1.b Action: Text added to pg. 1.4-2, 1.4-3 to describe relationship of County and LERO.

Clarification: Suffolk County participation is further provided for in OPIP 3.6.3, Traffic Control, which provides for the participation of County or other police at traffic control points.

A.1.d Action: Titles of LILCO employees who will serve as Director of Local Response added to OPIP 2.1.1, Organization Implementation.

Clarification: None

A.2.a Action: Responsibility for Protective Actions added under Director of Local Response on Figure 2.1.2.

Clarification: The responsibility for traffic control is indicated in Figure 2.1.2, and 191 persons are identified as performing that function on Figure 2.1.1. OPIP 2.1.1, Organization Implementation, identifies the LILCO employees by title who will act as Traffic Guides. It is stated in the plan on pg. 2.2-4 that it is expected that normal law enforcement activities would be performed by local agencies. The question of legal authority is addressed in A.2.b.

A.2.b Action: Text added to pg. 1.4-1, 1.4-2 to describe legal authority.

Clarification: None

A.3 Action: Agreements with bus companies, the US Coast Guard, the Dept. of Energy, WALK and the American Red Cross have been obtained and added to the plan. As other letters of agreement become available, these will be added to the plan.

Clarification: None

C.4 Action: (See A.3)

Clarification: (See A.3)

E.7 Action The Emergency Broadcast System messages will be modified to include routing instructions.

Clarification: OPIP 3.82, EBS Activation contains detailed descriptions of the protective action areas (pp 25-27). The evacuation routes are adequately described by not only the brochure, but also on transient posters. In addition, refrigerator magnets and automobile glovebox stickers are under development that will contain this information.

F.1.c Action: None

Clarification: As indicated in the plan on page 3.4-4 and/or Figure 3.4.1 there are both dedicated and commercial telephone links with the Department of Energy, Brookhaven Area Office. As indicated in OPIP 3.3.2, Notification of Emergency Personnel, page 41, the U.S. Coast Guard and Federal Aviation Administration are communicated with by telephone.

F.2 Action: Text added to page 3.4-3 to clarify medical communication chain.

Clarification: Since communications will be from the LERO Ambulance Coordinator to the existing adequate medical communications network, no further description is should be required.

G.2 Action: Brochure has been revised to include improved maps and response card and a listing of schools. The transmittal letter has been deleted.

The brochure will be revised to include other EBS Stations once the information becomes available.

Clarification: None

G.3.a Action: Text has been added to the plan at page 3.8-4 and to OPIP 3.8.1, Public Information page 2 that describes the physical arrangements for the media.

Clarification: None

I.8 Action: Text added to the plan at pg. 3.5-2 that indicates the estimated deployment times of monitoring teams.

Plan, page 3.5-2 revised to indicate where survey kits are available for pick up.

Clarification: OPIP 3.5.1, Downwind Surveying, page 2 indicates where survey kits are available for pick up.

J.2 Action: Alternate routes are described in material added as Attachment 5 to OPIP 3.6.3, Traffic Control.

Clarification: None

J.10.a Action: None

Clarification: Civil defense shelters are not relied on in the plan and therefore not identified.

J.10.c Action: Reference to Figure 3.3.6 on page 3.3-5 has been changed to Figure 3.3.5. Information regarding the number and identity of deaf or hearing impaired persons within the EPZ requiring special notification is presently being gathered. When this information is obtained options for their notification will be evaluated.

At the present time, WALK has committed to act as the EBS station. If agreements are reached with supplementary stations, they will be added to the plan.

Clarification: None

J.10.d Action: Commitments for the specific resources required to evacuate confined persons is presently being

obtained. When the necessary information is determined, it will be added to the plan.

Clarification: The plan does not assume that if a mobility-limited person does not answer the phone that he or she is not at home. OPIP 3.6.5, Special Evacuations pg. 2-4 states that ambulances are dispatched to all residences regardless of whether telephone contact is made with the individual.

J.10.e Action: None

Clarification: OPIP 5.3.1, Emergency Equipment Inventory Attachments 8, 9, 10 indicate the quantity of KI stored at each location. New York State policy is that the general public will not receive KI. LERO complies with State policy.

J.10.f Action: The plan at page 3.6-5 has been changed from the Radiation Health to Health Services Coordinator to be consistent with OPIP 3.6.2.

Clarification: None

J.10.g Action: The resources for buses for both school and general public evacuation are presently being identified. When obtained, this information will be added to the plan.

Clarification: Sufficient drivers of buses for evacuation of the general public are identified in the plan (Figure 2.1.1) and in OPIP 2.1.1, Organization Implementation, as LILCO employees.

J.10.h Action: Incorrect cross reference element deleted.

Clarification: Agreements are between the American Red Cross (ARC) and facilities to be used as relocation centers.

J.10.j Action: None

Clarification: The evacuation time estimates take into account that traffic guides could in some cases suggest that traffic move counter to an existing signal.

J.10.k Action: A discussion of snow removal has been added to the plan at page 2.2-4. Four evacuation route spotters have been added to bring the total number to six.

Clarification: None

J.10.l Action: The evacuation time estimate (Appendix A, Evacuation Plan, Table XV) has been revised to comply with Appendix 4 of NUREG-0654.

Clarification: The Table DHS-11 referred to in FEMA's comments is an outdated table that appeared in an earlier version of the Suffolk County plan and does not appear in the LERO plan. It should not be referred to.

K.3.b Action: Text in plan, page 3.9-2 has been revised to be consistent with OPIP 3.6.3, Traffic Control and OPIP 3.9.1, Dosimetry and Exposure Control. Readings are taken at 15 minute intervals. See Appendix A, page V-1 for discussion of assumption regarding school in session with summer population.

Clarification: None

K.5.a Action: Text in plan, page 3.9-6 has been revised to eliminate reference to 10 rads.

Clarification: None

L.4 Action: Ambulance organizations are presently being contacted. When information regarding the services they provide has been obtained, it will be added to the plan.

Clarification: None

N.2.a Action: Text added to OPIP 3.4.1, Communications Testing for quarterly testing of the notification links between LERO and the U.S. Coast Guard, FAA, and the State of Connecticut. Also added is text requiring a portion of the notification form to be read to test understanding of message content.

Clarification: OPIP 3.4.1 provides for monthly notification tests with New York State and quarterly tests with the Department of Energy.

N.3. Action: Text added to the plan at page 5.2-1 and OPIP 5.1.1, a-f Training Procedure, page 8 regarding free play.

Clarification: None

N.4 Action: Text added to plan at 5.2-4 and OPIP 5.1.1 pages 8, 9, regarding critiques.

Clarification: None

N.5 Action: Text added to OPIP 5.1.1 page 9, regarding means of evaluating federal comments.

Clarification: None

O.4.b Action: None

Clarification: Field monitoring teams are supplied by the Department of Energy. They receive LERO training as indicated in OPIP 5.1.1, Attachment 1. Field teams are expected to have been trained by the DOE in the use of instrumentation.

O.4.f Action: None

Clarification: Ambulance personnel receive LERO training as indicated in OPIP 5.1.1, Attachment 1. Element O.4.f does not require training of nonprofessional firefighting personnel.

P.8 Action: Cross reference has been revised.

Clarification: None

Attachment 2

<u>Revision</u>	<u>Contention/Discovery Item, Date</u>	
OPIP 3.3.3 Section 5.2.d	Discovery Question 9	6/28/83
OPIP 3.5.1 page 4	Contention 14	7/7/83
OPIP 3.6.3 pp. 8,10,12	Contention 87	7/7/83
OPIP 3.6.4 page 6	Contention 87	7/7/83
OPIP 3.6.4 page 10	Discovery Question 3	6/28/83
Plan page 3.4-3	Discovery Question 2	6/28/83
Plan page 3.4-3	Contention 91	7/7/83
Plan page 3.6-5	Contention 25	7/7/83

ATTACHMENT 5

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