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NUCLEAR REGULATORY COMMISSION  
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March 14, 1985

MEMORANDUM FOR: The Commissioners  
FROM: William J. Dircks  
Executive Director for Operations  
SUBJECT: WATERFORD EMERGENCY MEDICAL SERVICES

The purpose of this memorandum is to inform the Commission of the status of offsite emergency medical services at Waterford Steam Electric Station, Unit 3 and to inform the Commission of the staff's recommendation in this matter.

As a result of the Court of Appeals decision in GUARD v. NRC, D.C.Cir. No.84-1091, issued on February 12, 1985, the requirements of 10 C.F.R. § 50.47(b)(12) with respect to arrangements for emergency medical services for members of the general public who are exposed to high levels of radiation are, at present, unsettled. In regard to Waterford Unit 3, however, the staff believes that, as provided by 10 C.F.R. § 50.47(c)(1), compelling circumstances exist so as to justify issuance of a full power operating license in spite of the deficiency found to exist, as a generic matter, by the court.

First, the applicant has, in reliance on the current requirement, as interpreted by the Commission in its San Onofre decision, CLI-83-10, 17 NRC 528 (1983), provided a suitable list of medical facilities and services. This list is contained in the State and Parish plans.

Second, given the currently uncertain nature of the requirements of 10 C.F.R. § 50.47(b)(12) with respect to members of the general public who may be exposed to high levels of radiation, the circumstances warrant like treatment of all applicants/licensees. It would appear to be preferable to develop a resolution to this issue on a generic basis rather than to impose new requirements in connection with the issuance of an individual license.

Third, the applicant has committed, by letter dated March 13, 1985, to satisfy any new requirements imposed by the Commission in connection with this issue.

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Fourth, the NRC and FEMA staffs have reviewed the Waterford emergency plans and those of the State of Louisiana and the two affected Parishes (FEMA letter enclosed) and have found that the following measures for emergency medical services for members of the general public who might be exposed to high levels of radiation are provided:

- a. The State plan provides for (1) technical guidance and assistance to hospital emergency departments and emergency medical transportation personnel; (2) identification of ambulance services that will provide emergency transportation for all affected persons off-site (100 vehicles) and (3) identification of hospitals with 24-hour emergency departments within a 25-mile radius of Waterford Unit 3 that have adopted procedures for medical emergencies involving radiation for all affected persons offsite (21 hospitals);
- b. The St. Charles Parish and St. John the Baptist Parish Emergency plans include all of the above provisions and additionally provide for a Health and Medical Officer to support and coordinate all health and medical operations. The St. Charles Parish (the host Parish) plan includes responsibilities for the Health and Medical Officer to maintain agreements with health organizations and St. Charles Hospital to ensure continuation of uninterrupted health and medical services during an emergency and to maintain an inventory of health care providers, facilities, materials and equipment necessary to protect the public in the event of an emergency;
- c. Both plans provide for notification of Parish emergency medical services and emergency standby status at the Alert Emergency level and notification with a request that they mobilize and brief their personnel at the Site Emergency level.

(Signed) William J. Dircks

William J. Dircks  
Executive Director for Operations

Enclosure:  
As stated

cc: SECY  
OPA  
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\* SEE PREVIOUS PAGE FOR CONCURRENCE  
\*\* W/CHANGES THRU CUNNINGHAM TELECON PER  
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*Per telecon from D. Matthews*  
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3/14/85

DL: LB #3\*  
JWilson:cs  
03/13/85

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