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May 2, 1988

Mr. C. G. Amato
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

Dear Charlie:

SHOREHAM SCENARIO REVIEW

Attached are the comments resulting from our review of the subject scenario. The scenario should support a reasonable demonstration of the licensee's Emergency Response capability. No major deficiencies were noted.

The operations and in-plant events scenario is exceptionally complex (eleven separate failures of equipment) and detailed, with extensive data provided on plant parameters and annunciator status.

However, the scenario does not contain data for a number of important parameters, including area radiation monitors, radiation monitoring system accident mode, reactor water activity, primary containment air activity, suppression pool water activity, secondary containment air activity, station vent release analysis, RBSVS release analysis, suppression pool air activity, and in-plant radiological information. The scenario states that actual data for these parameters above will be provided shortly after LILCO, NRC, and FEMA agree on the strength and duration of the planned radioactive release. In Section 6.2.1 (Radiation Monitoring System Normal Mode Data) and Section 6.5 (Radiological Release Survey Information), data is presented that appears to detail the offsite radioactive release. From this information it appears that the strength and duration of the planned radioactive release has already been determined. It is possible that the Radiological Release Survey Information may also have been intended as an example only. This needs to be clarified!

The comments are classified as follows:

Major Deficiencies - Those which may have a serious negative impact on the overall conduct of the exercise - e.g., prevent an adequate demonstration of the licensee's Emergency Response capability.

Minor Deficiencies - Those items which, individually, may degrade the demonstration of certain parts of the licensee's capability, but should not significantly detract from the overall success of the exercise.

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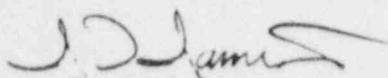
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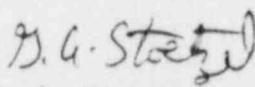
Other Deficiencies/Questions - Items such as minor deficiencies or inconsistencies in scenario data, or matters of clarity which the licensee may wish to examine or explain prior to the exercise.

If you have any questions concerning these comments, please contact me on FTS (509) 375-3782, or G. A. Stoetzel on FTS (509) 375-2781.

Sincerely,



J. D. Jamison
Program Manager
Operational Health Physics
Personnel Dosimetry Section
HEALTH PHYSICS DEPARTMENT



G. A. Stoetzel
Senior Research Scientist
Operational Health Physics
Personnel Dosimetry Section
HEALTH PHYSICS DEPARTMENT

JDJ/GAS:chb

cc: DB Matthews, w/enclosure
LC Ruth, w/enclosure

SCENARIO REVIEW
for
SHOREHAM EXERCISE

Major Deficiencies

None.

Minor Deficiencies

1. Section 6.5 - Assuming the offsite survey data presented in Tables 6.5.2.A through 6.5.3.D are plume centerline values, the scenario data did not compare favorably with calculations done using IRDAM with the same input information. Whole body dose rates and child thyroid doses for both the east and the west plume were an order of magnitude greater using IRDAM. If the tables are not centerline values, a discussion should be presented on determining centerline values. If the tables do present centerline values, the dose calculations should be reviewed.

Other Deficiencies/Questions

Exposure Pathway

1. Section 5.2 (SPDS) - This section contains SPDS data sheets for the time interval 1300-1500. However, according to the scenario timeline, SPDS will not be operable during this time period due to the failure of emergency bus 102.
2. Section 6.2 (p. I 6-26) - In Table 6.2.1-1 the 1515 entry for monitor PM-134 should be 1.07E+03 not 1.07E-03.
3. Section 6.5 (p. I 6-33) - The "approximate incremental exposure" column in Table 6.5.2.A contains doses that appear to be approximately an order of magnitude greater than one would expect from the survey results presented in the table.

Ingestion Pathway

1. Section 6.3 and 6.4 (p. II 6-52 through p. II 6-53) - The Radioactive Sample Information and the In-Plant Radiological Information were not available for review.
2. Section 6.6 - It is not clear why the pasture grass exposure rates in Table 6.6.21-1 (p. II 6-78) are greater than the deposition exposure rates in Table 6.6.20-1 (p. II 6-77). Are the exposure rates for the pasture grass samples from a collected sample or a ground survey?

3. Section 6.6 - The ground deposition activity for I-131 in Table 6.6.1-1 (p. II 6-58) and Table 6.6.1-2 (p. II 6-94) are not consistent. For the NE plume (AA'-GG'), the I-131 activity decreased about 25% from day 2 to day 4 which is consistent with the half-life of I-131. The I-131 activity for the E plume (AA-GG) decreased by about 93% which is not consistent with the half-life of I-131. The sample problem was noted for the data on soil specific activity, pasture grass isotopic activity, leafy vegetables activity, and fresh produce activity.

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NEW HAVEN, CONN.
REGISTER

APR 20 1980

State won't take part in tests at Shoreham

By Phil Blumenkrantz
Register Staff

Connecticut has entered the flap over the Shoreham nuclear reactor on Long Island, serving notice it won't participate in tests of plans for emergencies.

The state's refusal to take part in a June test of Shoreham's emergency preparedness could "raise questions as to whether or not the planned exercise meets the (licensing) requirements of full participation," Bill McAda, a spokesman for the Federal Emergency Management Administration in Washington, D.C., said Thursday.

The Shoreham plant needs a federally approved plan for protecting people within a 50-mile radius from radiation exposure through ingestion of milk, food or water.

Much of Connecticut, including Greater New Haven, falls within that area, which gives the state a role in Shoreham's approval process.

The action echoes Massachu-

setts' refusal to participate in emergency plans for the Seabrook nuclear plant in adjacent New Hampshire — Seabrook's key obstacle toward a full-power license.

New York, which opposes Shoreham, forbids state and local workers from participating in Shoreham's emergency plans. The Long Island Lighting Co., Shoreham's owner, in a letter dated April 15 asked for the participation of Connecticut's Office of Civil Preparedness.

"This office would participate in an interstate exercise only in full coordination with participating states and local governments," Office of Civil Preparedness Director Frank Mancuso wrote LILCO Vice President Ira Freilicher in a letter dated Wednesday. "We have not obtained such coordination."

"LILCO is not a government agency," Mancuso said Thursday. "I am not going to get involved in their explosive local politics."

A spokesman from LILCO, Jim Lois, said LILCO would not com-

ment until it has received Mancuso's letter.

Shoreham would be the only one of seven reactors either in Connecticut or within 50 miles of its borders for which no cooperative arrangement exists between the utility's operators and government authorities.

Connecticut officials said they would not leave citizens unprotected in the unlikely event of an accident at Shoreham, should the plant be licensed.

"We would do everything that is necessary to protect the public health and safety," said Kevin McCarthy, director of the radiological control unit of the state Department of Environmental Protection. "But we would prefer to work with the states."

Plans for other Connecticut nuclear reactors call for state employees to sample pasture grass, milk, drinking water and vegetables for radiation following a major acci-

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dent, to keep farm animals from eating from contaminated pastureland, embargo food and even order evacuations in extreme cases.

Lois said LILCO has trained 3,000 people — 2,000 of them LILCO employees — to do everything from direct traffic, drive ambulances and take radiation samples in the unlikely event of a serious accident. But Lois said LILCO believes government authorities would exercise responsibility, if necessary.

In February, a federal Atomic Safety and Licensing board found "fundamental flaws" in Shoreham's emergency plan, calling

LILCO's emergency workers "amateurs." LILCO appealed that before the ASLB on Thursday.

The New Haven Board of Aldermen is to vote Monday on a resolution that says, "The possibility of a nuclear accident at the Shoreham plant presents a clear danger to the greater Long Island area, which includes New Haven."

The resolution would support Long Island's fight against Shoreham.

Connecticut will play a lesser role in Shoreham than Massachusetts in Seabrook, largely because Shoreham's state and local authorities already oppose Shoreham. Connecticut has taken no direct stand on Shoreham, however.

Connecticut lacks the leverage of Massachusetts, which has towns within a 10-mile emergency zone of Seabrook. Only a portion of Fishers Island in Connecticut is within a 10-mile radius of Shoreham. New Haven is 18 miles away.

The federal Nuclear Regulatory Commission recently changed its rules and now requires FEMA to consider utility-sponsored emergency plans. Previously, only government-sponsored plans were acceptable. Mancuso opposes that rule change.

Emergency plans for 50-mile zones have never had to be carried out in the United States, not even after the accident at Three Mile Island in Pennsylvania.

another for just radioactive waste in the other state.

Spent nuclear fuel rods used at power plants would not be disposed of at the site.

Connecticut Hazardous Waste Management Service will begin looking for sites this year.

"I'm very concerned about safety," said Mary Ellen Marucci of New Haven, after carting in an orange poster reading "People's Health — Not Healthy Profits" and "Greed and Death — Nuclear Terrorism."

"We already have radioactive waste dumps — nuclear power plants that have polluted the area beyond repair," she said. "I'm tired of industry making a lot of money dumping the cost of cleanup on the public."

Thomas V. Bottillo of Bridgeport, who received a patent this month on a process that involves disposing of chemical and radioactive waste in active volcanoes, urged the commission to consider his idea. "This is a very viable alternative," he said.

Mary Anne Maul, senior staff attorney at the Connecticut Fund for the Environment, said she opposes incineration of the waste to reduce its volume because the point of storage is to "contain the waste — not release it into the environment."

NEW HAVEN, CONN.
REGISTER
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Radioactive waste sites, storage options discussed

20 question plans for hazards' disposal

By Beth Burrell
Register Staff

NEW HAVEN — Options for the state's first radioactive-waste storage site were unveiled Wednesday, drawing to a public meeting nuclear power opponents, environmentalists and a man who proposed disposing of the wastes in live volcanoes.

About 20 people peppered the Northeast Interstate Low-Level Radioactive Waste Commission with questions and comments during a three-hour meeting at Howard Johnson's.

The commission was formed by Connecticut and New Jersey in

December to oversee disposal in the two states.

The commission will choose one of four options this summer for disposing of the two states' 130,000 cubic feet of low-level radioactive waste generated each year.

Options being considered are locating sites in both states; building a treatment site in one state and disposal site in the other state; storing wastes with higher concentrations of radioactivity in one state and lower concentrations in the other; and building one site for radioactive waste and hazardous chemical wastes in one state and

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STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC SAFETY
OFFICE OF CIVIL PREPAREDNESS

MAY 2 1988

April 27, 1988

Mr. Ira L. Freilicher
Vice President, Law & Corporate Affairs
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

Dear Mr. Freilicher:

Your letter of April 15, 1988 requested that this office participate in your proposed June exercise.

This office would participate in an interstate exercise only in full coordination with the participating states and local governments. We have not obtained such coordination.

Therefore, this office will not conduct any evaluation exercise activities or any simulation activities during the proposed exercise conducted by LILCO.

Sincerely,

Frank Mancuso

Frank Mancuso
Director

FM:js

cc: Dir., N.Y. Emerg. Mgmt.
Dir., FEMA - One
Commissioner, Conn. DEP
OCP Opns (N.Y. file)
cf

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