

July 25, 1988

Ref 200 3/83-DRSP  
Action Crutchfield

Dr. Thomas Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

RE: Cleveland Electric Illuminating Company  
Perry Nuclear Power Plant, Units 1 & 2  
Docket Nos. 50-440 & 50-441  
2.206 Petition filed 9/22/87 and amended  
10/8/87 and 4/8/87 by Concerned Citizens  
of Lake, Geauga, and Ashtabula Counties,  
Ohio on the subject of the Emergency  
Information Preparedness Handbook

Dear Dr. Murley:

For some reason, NRC Region III in Glen Ellyn, Illinois has omitted the petitioners, Concerned Citizens of Lake, Geauga, and Ashtabula Counties, Ohio from the service list for distribution of FEMA, EPA, and other documents pertaining to the above-captioned 2.206 Petition, as clearly evidenced by W.D. Shafer's letter to CEI date stamped 5/16/88, a copy of which is enclosed. Petitioners, therefore, were not mailed this letter nor were we mailed the following documents:

1. FEMA memorandum for NRC's Frank J. Congel from Richard W. Krimm date stamped 2/26/88 regarding the above-captioned 2.206 Petition (copy enclosed)
2. FEMA Response to Request for Assistance by the U.S. NRC to the 2.206 Petition from the Concerned Citizens concerning the EIH for the PNPP, February 16, 1988 (copy of first page only enclosed), a 15 page document with 2 attachments, the second of which is an EPA letter (date stamp is obscured) from Steve Rothblatt to Dan Brent of FEMA (copy enclosed).
3. FEMA memorandum for NRC's J. Philip Stohr from Richard Krimm date stamped 4/19/88 (copy enclosed).

Petitioners obtained this information purely by chance through a citizen's contact with the Public Utilities Commission of Ohio. Otherwise, petitioners would not even have been aware of the existence of these documents.

In light of the recommendations made by FEMA and the EPA in the enclosed, above-mentioned documents, Concerned Citizens of Lake, Geauga, and Ashtabula Counties, Ohio wish to again amend our 2.206 Petition of 9/22/87 per this letter to incorporate the FEMA and EPA recommendations contained in the above-mentioned information which is not enclosed herein in its entirety.

Further, the petitioners recently discovered that a 6/22/88 FEMA 8807050044 for NRC's Frank J. Congel from Richard W. Krimm exists. Again, petitioners never received this memo either.

The petitioners look forward to receiving a copy of FEMA memorandum 8807050044 and all future documents pertinent to our 2.206 Petition.

Thank you so much for your time and consideration.

Sincerely yours,

*Connie Kline*

Connie Kline  
38531 Dodds Landing Dr.  
Willoughby Hills, OH 44094  
(Lake County)

*Russ Bimber Ron O'Connell*

Russ Bimber  
10471 Prouty Rd.  
Painesville, OH 44077  
(Lake County)

*Theresa*

*Burling*

Ron O'Connell  
315 Garfield St.  
Geneva, OH 44041  
(Ashtabula Cnty.)

Theresa Burling  
11701 Colburn Rd.  
Chardon, OH 44024  
(Geauga County)

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NUCLEAR REACTOR  
REGULATION

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
REGION III  
799 ROOSEVELT ROAD  
GLEN ELLYN, ILLINOIS 60127

MAY 16 1988

Docket No. 50-440

The Cleveland Electric Illuminating  
Company

ATTN: Mr. Alvin Kaplan  
Vice President  
Nuclear Group

10 Center Road  
Perry, OH 44081

Gentlemen:

Enclosed for your information and action are: (1) FEMA's February 26, 1988 review of the petition filed under 10 CFR 2.206 by the Concerned Citizens of Ashtabula County, Concerned Citizens of Geauga County and Concerned Citizens of Lake County, Ohio, concerning the Perry Nuclear Power Plant; and (2) the April 19, 1988 clarification of two issues in FEMA's review. The transmittal of the February 26, 1988 review was delayed pending issuance of the clarification from FEMA.

In the interim, the petition was amended on April 8, 1988, to limit concerns only to alleged deficiencies in the revised public information contained in the 1988 calendar. The petitioners have identified five issues.

We encourage you to continue to work closely with State and local agencies as you have done in the past to resolve these issues as appropriate.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter and the attachment will be placed in the NRC's Public Document Room.

Sincerely,

A handwritten signature in cursive script that reads "W. D. Shafer".

W. D. Shafer, Chief  
Emergency Preparedness and  
Radiological Protection Branch

Enclosures: As stated

See Attached Distribution

(over please)  
~~88-5250295~~ 2A

The Cleveland Electric Illuminating Company 2

MAY 16 1988

Distribution:

cc w/enclosures:

F. R. Stead, Director, Perry  
Plant Technical Department  
M. D. Lyster, General Manager,  
Perry Plant Operations Department  
Ms. E. M. Buzzelli, Manager,  
Licensing and Compliance Section  
DCD/DCB (RIDS)  
Licensing Fee Management Branch  
Resident Inspector, RIII  
Harold W. Kohn, Ohio EPA  
Terry J. Lodge, Esq.  
James W. Harris, State of Ohio  
Robert M. Quillin, Ohio  
Department of Health  
State of Ohio, Public  
Utilities Commission  
Murray R. Edelman

*Petitioners omitted  
from service list.*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

234 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF

0 5 070 107

Mr. Dan Bement  
Federal Emergency Management Agency  
Natural and Technological Hazards Division  
175 West Jackson, 4th Floor  
Chicago, Illinois 60604

Dear Mr. Bement:

In response to your request of November 23, 1987, the Radiation Program staff of the United States Environmental Protection Agency (USEPA) Region V Office offer the following comments relating to three statements of radiological significance from the Request for Action Under 10 CFR 2.206 for the Perry Nuclear Power Plant:

X  
On pages 14-15 of the Request the assertion is made that page 15 of Perry's booklet entitled "Emergency Preparedness Information" contains several misleading statements related to the health effects of ionizing radiation and should be rewritten. We largely concur with these assertions. On page 15 of the booklet examples of nonionizing radiation are casually associated with ionizing radiation in a way in which a lay reader could be led to believe that they have identical health significance. Also, the notion is put forward that low exposures to ionizing radiation (background levels) are "normal", while high exposures "may be harmful to human health". This could easily be misinterpreted as stating that low exposures are safe. This misinterpretation may be carried further by the statement: "But to be safe, the law requires that people are not exposed to too much radiation", when the only numerical example of too much radiation put forth is 25,000 millirem (mrem). We feel that this section of the booklet does need to be rewritten so as to convey to the lay public a more accurate picture of current radiation protection philosophy (i.e. linear, non-threshold health effects model, principle of keeping exposure as low as reasonably achievable, known health effects of ionizing radiation, etc.) However, we feel that the lack of rigor in the current version of the booklet will not imminently compromise the implementation of the emergency plan. As such, we believe that the necessary modifications of this booklet could take place within some reasonable time frame without consequence.

-2-

On page 14 of the request, exception is taken to the statement on page 15 of the Emergency Preparedness booklet: "By law, a nuclear power plant may not expose the public to more than five millirems per year. The Perry plant will give you a dose of one or two millirems per year." We believe that the license should furnish the reference for this statement, as our own research into the legal limit for operation has not yielded a consistent answer. The USEPA environmental standard for nuclear fuel cycle facilities is 25 mrem/yr to the general public (40 CFR 190.10), but this is a limit from all nuclear fuel cycle operations (i.e., from both reactors in the case of the Perry station). The Nuclear Regulatory Commission (NRC) imposes an objective on the design of a nuclear power plant that it be built to limit population exposures to between five and ten millirems per year due to gaseous releases, however, this design objective is assigned specifically to each plant during its siting and licensing. (10 CFR 50, Appendix I, Paragraphs B1 and B2)

(over please)

Finally, on page 15 of the request the assertion is made that "CEI plans to recommend evacuation only to prevent projected public exposures which will exceed ... within six hours, the annual limit of 5000 millirems for nuclear plant workers." (USEPA Region V staff would like to obtain the reference for this statement.) "And any exposure already received during the emergency, without limit, is ignored. This is allowed by EPA 520/1-75-001, which has never been justified. It was supposed to be justified by Appendix C, to be published later."

It is unfortunately true that Appendix C of EPA 520/1-75-001, "Manual of Protective Action Guides and Protective Actions for Nuclear Incidents", is still unpublished in final form, although a draft form of Appendix C does exist. The criticism of this fact is justified, and will be communicated to the appropriate USEPA staff. However, the bulk of the criticism in this paragraph appears to be directed at an improper and inflexible interpretation of the Protective Action Guide (PAG), presented in EPA 520/1-75-001 which applies to the general public for the purpose of avoiding unnecessary exposure from a passing plume. Moreover, the criticism is directed solely at the utility, when in fact, State and local response agencies carry the primary responsibility for using the PAG to recommend and implement protective measures such as sheltering and evacuation. A detailed understanding of the PAG may help to clear up this issue.

The PAG for the general population/plume exposure from which the State and local agencies draw guidance applies to actual or projected exposures to the general population commencing at the beginning of the accident. It does not cover population exposures occurring before the beginning of the accident which are limited to between 5-25 millirem per year by environmental standards and design objectives. The PAG is expressed as a range

-3-

of real or projected exposures over which the need for protective actions should be considered. The PAG is expressed as a range, rather than a single value, in order to give the States flexibility in their accident response. The purpose of the PAG is to guide decisions about protective actions so that they may be implemented before the exposures actually occur, i.e., while the exposures are still only projected to occur. This is consistent with the philosophy of keeping exposures as low as reasonably achievable, and at the same time, allows local constraints such as ease and economic impact of evacuation to be taken into account by response agencies.

The range of projected population exposures over which this PAG applies is 1000 to 5000 millirem. The PAG recommends that evacuation be considered when projections reach 1000 mrem (although evacuation could be recommended at lower projections depending on local and plant conditions) and that evacuation be recommended when projections reach 5000 mrem or higher.

It is thus, untrue that EPA 520/1-75-001 allows unlimited population exposure and, if it is borne in mind that the State response agency has the primary responsibility for deciding to recommend protective actions, then it follows that the criticism of the utility in this matter is largely misdirected.

Please contact us if we can be of further assistance in this matter.

Sincerely yours,

*Shirley Mitchell*

for Steve Rothblatt, Chief  
Air and Radiation Branch (5AR-26)



## Federal Emergency Management Agency

Washington, D.C. 20472

FEB 26 1988

MEMORANDUM FOR: Frank J. Congel  
 Director  
 Division of Radiation Protection  
 and Emergency Preparedness  
 Office of Nuclear Reactor Regulation  
 U. S. Nuclear Regulatory Commission

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

SUBJECT: 10 CFR 2.206 Petition, Public Information Brochure,  
 Perry Nuclear Power Plant

This is in response to your November 3, 1987, memorandum requesting assistance in reviewing a petition filed under 10 CFR 2.206 by the Concerned Citizens of Lake County, Concerned Citizens of Geauga County, and Concerned Citizens of Ashtabula County, Ohio. The petition primarily contained a request that the Director of Nuclear Reactor Regulation order the Cleveland Electric Illuminating Company (CEI) to correct certain deficiencies and misinformation contained in the undated Emergency Preparedness Information Handbook (EIH), and to redistribute the corrected handbook to the population within the Plume Exposure Pathway Emergency Planning Zone for the Perry Nuclear Power Plant.

The Federal Emergency Management Agency (FEMA) Headquarters and Region V reviewed the petition and associated materials. Our review is attached to this memorandum. The new Perry EIH entitled, 1988 Calendar, Emergency Preparedness Information, dated December 1987, has also been reviewed. The 1988 EIH calendar was forwarded to FEMA on December 14, 1987, and has replaced the EIH addressed in the petition. The attached review reaches conclusions, summarized below, on the issues raised by the petition:

- The 1988 EIH calendar does respond to key issues raised in the petition; therefore, FEMA does not recommend that the current EIH be immediately revised and redistributed. However, FEMA does recommend that certain changes be considered in the next annual revision of the EIH;
- The review does contain a recommendation that the Nuclear Regulatory Commission order the CEI to work with the State and local authorities to address within 120 days the planning issues involving the role of "receiving schools" in evaluation procedures and the lack of permanent installation of emergency information signs in Lake and Ashtabula Counties; and,

- 2 -

- The CEI, State, and local authorities should be commended for encouraging the reading of the EIH to blind persons; however, in the next annual EIH update these authorities may want to consider other means of providing information to the visually handicapped such as large print, braille materials, audio cassette tapes, and other audio media.

The FEMA review addresses only offsite issues in the 2.206 petition and does not address any issues FEMA believes should be reviewed by the Nuclear Regulatory Commission. In addition, the section on radiation and its health effects in the petition has been reviewed and commented on by the Environmental Protection Agency, Region V.

If you have any questions concerning this review please do not hesitate to contact me at 646-2871.

Attachment  
 FEMA Review

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 (over phase)

Page one only

FEDERAL EMERGENCY MANAGEMENT AGENCY

Response to a Request for Assistance  
by the  
U. S. Nuclear Regulatory Commission

to a

Petition filed under 10 CFR 2.206  
from the  
Concerned Citizens of Ashtabula, Geauga, and Lake Counties, Ohio  
concerning the  
Emergency Preparedness Information Handbook  
for the  
Perry Nuclear Power Plant

February 16, 1988

Introduction:

This review addresses issues raised in the 10 CFR 2.206 petition from the Concerned Citizens of Ashtabula, Geauga, and Lake Counties in Ohio, concerning the Perry Nuclear Power Plant's Emergency Preparedness Information Handbook. The petition requests that the Nuclear Regulatory Commission (NRC), Director of Nuclear Reactor Regulation, order the Cleveland Electric Illuminating Company (CEI) to correct certain deficiencies and misinformation contained in its undated Emergency Preparedness Information Handbook (hereafter referred to as EIH) and to redistribute a corrected handbook to the population living within the Plume Exposure Pathway Emergency Planning Zone (EPZ). Comments reflected below are addressed in the order that the issues are raised in the 2.206 petition. Please note that this review is based on information contained in the 1988 EIH calendar (distributed in December 1987) while the petition addresses the earlier green, undated EIH.

EIH Cover:

A two page map of the Perry ten mile EPZ is included in the 1988 EIH calendar. This map is similar to the foldout map in the earlier "white" and "green" versions of the Perry EIH. The ten mile EPZ map in the 1988 EIH is also entitled "Pick-Up Points, Referral Points and Care Centers". It shows evacuation routes, county boundaries, some geographic features, locations of some towns, etc., but it is not so detailed that it would confuse the reader. Printing the ten mile EPZ map on the cover would be impractical and redundant.

The 1988 Perry EIH Calendar does have a date printed on page one. This corrects the concern raised in the 2.206 petition. > (1)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

134 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REF. TO THE ATTENTION OF

9 8 1987

Mr. Dan Bement  
Federal Emergency Management Agency  
Natural and Technological Hazardous Division  
175 West Jackson, 4th Floor  
Chicago, Illinois 60604

Dear Mr. Bement:

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On pages 14-15 of the Request the assertion is made that page 15 of Perry's booklet entitled "Emergency Preparedness Information" contains several misleading statements related to the health effects of ionizing radiation, and should be rewritten. We largely concur with these assertions. On page 15 of the booklet examples of nonionizing radiation are casually associated with ionizing radiation in a way in which a lay reader could be led to believe that they have identical health significance. Also, the notion is put forward that low exposures to ionizing radiation (background levels) are "normal", while high exposures "may be harmful to human health". This could easily be misinterpreted as stating that low exposures are safe. This misinterpretation may be carried further by the statement: "But to be safe, the law requires that people are not exposed to too much radiation", when the only numerical example of too much radiation put forth is 25,000 millirem (mrem). We feel that this section of the booklet does need to be rewritten so as to convey to the lay public a more accurate picture of current radiation protection philosophy (i.e. linear, non-threshold health effects model, principle of keeping exposure as low as reasonably achievable, known health effects of ionizing radiation, etc.) However, we feel that the lack of rigor in the current version of the booklet will not imminently compromise the implementation of the emergency plan. As such, we believe that the necessary modifications of this booklet could take place within some reasonable time frame without consequence.

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*Shirley Mitchell*

for Steve Rothblatt, Chief

Air and Radiation Branch (SAR-26)



## Federal Emergency Management Agency

Washington, D.C. 20472

FEB 26 1988

MEMORANDUM FOR: Frank J. Congel  
 Director  
 Division of Radiation Protection  
 and Emergency Preparedness  
 Office of Nuclear Reactor Regulation  
 U. S. Nuclear Regulatory Commission

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

SUBJECT: 10 CFR 2.206 Petition, Public Information Brochure,  
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Attachment  
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*88-4270113* *200*  
*(over please)*

page one only

FEDERAL EMERGENCY MANAGEMENT AGENCY

Response to a Request for Assistance  
by the  
U. S. Nuclear Regulatory Commission

to a

Petition filed under 10 CFR 2.206  
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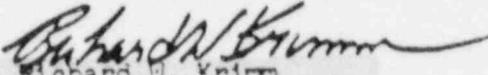


# Federal Emergency Management Agency

Washington, D.C. 20472

APR 19 1988

MEMORANDUM FOR: J. Philip Stohr  
Acting Director  
Division of Radiation Protection  
and Emergency Preparedness  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission

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

SUBJECT: Clarification of Two Issues in the Federal Emergency  
Management Agency's (FEMA) Response to the Perry Nuclear  
Power Plant 2.206 Petition

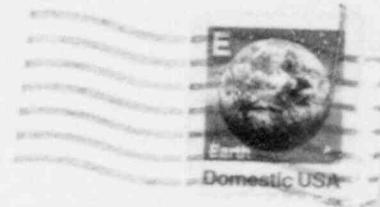
The purpose of this memorandum is to clarify FEMA's position regarding two issues addressed in our response to the Perry Nuclear Power Plant 2.206 petition on the Emergency Information Handbook. The first issue involves the receiving schools and evacuation procedures involving school children. The second issue involves the placement of instructional signs in Lake and Ashtabula Counties.

It is FEMA's position that the existing school evacuation planning procedures involving the receiving schools should be reviewed to consider alternative planning approaches, as outlined in our February 26, 1988, response to the Nuclear Regulatory Commission (NRC). In our view these approaches should be considered for incorporation in the next revision of the offsite plans for Perry. In our February 26, 1988, review we were trying to emphasize that we believe this issue is important enough to warrant having all affected parties, the State of Ohio, the local jurisdictions, and the Cleveland Electric Illuminating Company, revisit this issue within the next four months with a goal of either arriving at a schedule for implementing plan changes or adopting a position on the issue. \*

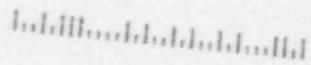
Regarding the placement of emergency information signs, FEMA does not concur with the current approach of storing the signs in Lake and Ashtabula Counties because of the potential for vandalism. The difficulty of installing them at the time of an accident overrides the storage approach. Our position remains that the signs should be installed within the next four months or a schedule should be provided for their installation. \*

8804270131 LP

Connie ...ine  
38531 Dodd's Landing Drive  
Willoughby Hills, Ohio 44094



Dr. Thomas Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Connie Kline  
38531 Dodd's Landing Drive  
Willoughby Hills, Ohio 44094



Dr. Thomas Murley, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

