



# Federal Emergency Management Agency

Washington, D.C. 20472

FEB 12 1986

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Mr. Victor Stello, Jr.  
Acting Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stello:

On January 16, 1986, the Nuclear Regulatory Commission (NRC) requested the Federal Emergency Management Agency (FEMA) to conduct a review of Revision 6 of the Long Island Lighting Company's (LILCO) Transition Plan for the Shoreham Nuclear Power Station (SNPS) and to provide the NRC with its findings. This request was made in accordance with the NRC/FEMA Memorandum of Understanding (MOU) dated November 1980. Due to the limited nature of the changes, the review was conducted by FEMA Region II staff.

A review of Revision 6 has been completed and the results are contained in the enclosed report entitled "LILCO Transition Plan for Shoreham - Revision 6, FEMA Review", dated February 7, 1986. The Plan was reviewed against the standards and evaluative criteria of NUREG-0654/FEMA-REP-1, Rev. 1. Due to the legal authority issues which arise when some NUREG elements are applied to a utility-based plan, we have marked with an asterisk any aspect of the plan where, in our view, this legal issue occurs. With the exception of plan aspects relating to NUREG element A.2.b. (a requirement to state, by reference to specific acts, statutes, or codes, the legal basis for the authority to carry out the responsibilities listed in A.2.a., i.e., all major response functions), the legal concern did not affect the FEMA rating given to the technical or operational items relating to NUREG elements.

FEMA finds that Revision 6 is a further improvement over Revision 5. Six inadequacies were identified in the RAC's review of Revision 5; five elements are rated inadequate in Revision 6. The deficiencies are explained in the FEMA review. The NUREG evaluation criteria for the 5 inadequate elements are as follows. (An asterisk indicates there is also a concern pertaining to legal authority which surfaced in the review. In some of the inadequacies, the legal issues are the major concerns.)

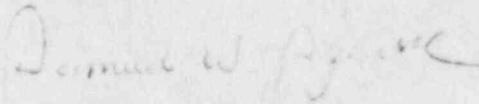
- (1) A.2.b.\* Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities (i.e., the authorities mentioned in NUREG-0654 element A.2.a.).
- (2) A.3.\* Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information.

- (3) C.4.\* Each organization shall identify nuclear and other facilities, organizations, or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.
- (4) J.10.k.\* The organization's plans to implement protective measures for the plume exposure pathway shall include: identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to the use of evacuation routes, and contingency measures.
- (5) J.12. Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

Of the above, all were identified as inadequate in the RAC's review of Revision 5.

I hope the enclosed finding is helpful in your analysis of emergency preparedness issues concerning Shoreham. If you have any questions, please don't hesitate to call me.

Sincerely,



Samuel W. Speck  
Associate Director  
State and Local Programs  
and Support

Enclosures

LILCO Transition Plan for Shoreham - Revision 6  
 FEMA Review  
 Dated February 7, 1986

<u>NJREG-0654</u> <u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
A.2.b	This element remains inadequate. No material in Revision 6 address this element. All comments in the RAC review of Revision 5 are still in effect.	I <sup>m</sup>
A.3	This element remains inadequate. - All comments in the RAC review of Revision 5 are still in effect. In addition, this revision requires the addition of a letter of agreement with the owners of the Brookhaven Multiplex Cinema for use of their property (parking lot) as a transfer point. The revised page B-vii shows this letter to be on page B-68 however, page B-68 is the letter of agreement with the previous transfer point property owner.	I <sup>m</sup>
C.4	This element remains inadequate. See the review comments under A.3.	I <sup>m</sup>
J.9	This element is now rated adequate. Revisions to Attachment 1 of procedure OPIP 3.6.6 reflect the current FDA response level tables including all footnotes which are necessary for proper use of the numeric data contained in the tables.	A
J.10.g	This element remains adequate. The designation of replacement transfer point required numerous changes to specify this new location. The plan changes are all involved with the logistics of the movements of buses for the transit dependent population who need assistance in evacuating the EPZ. The new logistics do not change the concept of any procedures.	A
J.10.k	This element remains inadequate. No material in Revision 6 address this element. All comments in the RAC review of Revision 5 are still in effect.	I <sup>m</sup>

\*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during the review of Revision 5 and are still in effect.

LILCO Transition Plan for Shoreham - Revision 6  
 FEMA Review  
 Dated February 7, 1985

NUREG-0654

ElementReview Comment(s)Rating

J.12

This element remains inadequate. As discussed below Revision 6 adequately addresses two concerns raised by the RAC review of Revision 5. A new Attachment B to procedure OPIP 3.9.2 gives a trigger levels for declaring items contaminated. This resolves the RAC issue of not having a trigger level for the interior of vehicles. Revision to the Plan on page 4.2-1 and in procedures OPIP 3.9.2 and 4.2.3 have deleted all reference to a particulate release as being a trigger for various actions. These changes resolve a RAC issue. Procedure OPIP 4.2.3 has been completely rewritten. The new procedure gives a new evacuee traffic pattern and a new monitoring arrangement at the Nassau County Coliseum Reception Center. This new procedure is adequate.

This Plan revision raises a new issue due to a change in procedure OPIP 3.9.2. In step 3.2 of the revised procedure, the statement is made that if a radioactive release has occurred, monitoring personnel will be dispatched to special facility reception centers when available. LERO is responsible for monitoring all evacuees arriving at reception centers. It is not adequate to plan for this monitoring with personnel and equipment when available. It is not possible to evaluate the number of personnel required for monitoring at the special population reception centers since the Plan shows in procedure OPIP 3.6.5 pages 21-37, "to be arranged" for most of the special population reception centers. Four (4) reception centers are shown which are not the Nassau County Coliseum. Monitoring personnel and equipment must be available for these four (4) reception centers and an other locations currently shown as "to be arranged".

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