September 28, 1998

Mr. Oliver D. Kingsley President, Nuclear Generation Group Commonwealth Edison Company ATTN: Regulatory Services Executive Towers West III 1400 Opus Place, Suite 500 Downers Grove, IL 60515

Dear Mr. Kingsley:

We have received the enclosed Federal Emergency Management Agency (FEMA) correspondence dated September 3, 1998, informing the Illinois Emergency Management Agency of a deficiency identified during the Quad Cities Nuclear Power Plant Radiological Emergency Preparedness exercise conducted on August 26, 1998.

We fully recognize that any corrective actions to be implemented may involve parties and political institutions which are not under your direct control. Nonetheless, we expect that assistance, if appropriate, will be extended.

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

Sincerely,

Original Signed by James R. Creed

James R. Creed, Chief Plant Support Branch 1

Docket Nos.: 50-254; 50-265 License Nos.: DPR-29; DPR-30

Enclosure: As stated

See Attached Distribution:

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cc w/encl:

- M. Wallace, Senior Vice President
- D. Helwig, Senior Vice President
- G. Stanley, PWR Vice President
- J. Perry, BWR Vice President
- D. Farrar, Regulatory Services Manager
- I. Johnson, Licensing Director
- DCD Licensing
- J. Dimmette, Jr., Site Vice President
- W. Pearce, Quad Cities Station Manager
- C. Peterson, Regulatory Affairs Manager
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- N. Schloss, Economist
- Office of the Attorney General
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09/08/1998 13:19 2026463508 PTEXRG SEP. 4.1998 2:30PM FEMA REGION V PT&E DIVISION



Federal Emergency Management Agency Region V 175 West Jackson Blvd., 4th Floor Chicago, IL 60604-2698

September 3, 1998

Mr. Rex A. Coble Acting Director Illinois Emergency Management Agency 110 East Adams Street Springfield, Illinois 62706

Dear Mr. Coble:

This letter officially informs you of the Federal Emergency Management Agency's identification of a Deficiency, which occurred during the Quad Cities Nuclear Power Plant Radiological Emergency Preparedness (REP) exercise conducted on August 26, 1998. This issue was discussed during the post-exercise participants briefing on August 28, 1998.

The Deficiency is being assessed against the Whiteside County Emergency Operations Center (EOC) under Objective10, Alert and Notification (A&N). The Deficiency resulted when Whiteside County failed to "Demonstrate the capability to promptly alert and notify the public within the 10-mile plume pathway emergency planning zone and disseminate instructional messages to the public on the basis of decisions by appropriate State or local officials."

Description: In Whiteside County, the first alert and notification sequence was not completed within 15 minutes (NUREG 0634, E.5, 6,7, SOP ESDA Duty Office [Site Area Emergency], AN-1). Delays occurred because the County was unable to reach the Emergency Broadcast System (EBS) station, via telephone, in time to disseminate the message within 15 minutes.

The 15-minute alert and notification sequence was not met. At 1022 hours, the EOC Director received the notification of a Site Area Emergency (SAE) and Protective Action Recommendations (PARs). There was no offsite release at that time. Coordination with Rock Island County followed immediately, and an agreement to sound sirens at 1033 hours was reached. The decision clock began at 1025 hours. At 1033 hours, the EOC Director notified the Sheriff's Dispatcher to sound the sirens in Whiteside County. A prescripted EBS message was selected from the plan and modified by the Public Information Officer and a State liaison. The message instructed residents of Albany Township to shelter, parents not to pick up their children at school, and farmers to shelter

livestock within 10 miles. The public was also instructed on preparations they should take for z possible evacuation.

The EOC Director utilized the radio station activation procedures for initiating the broadcast of the EBS message on radio station WHTS. The primary (hot line) number was busy because Rock Island County was contacting the station simultaneously. He unsuccessfully tried two other numbers given in the procedures. First, there was a recording; secondly, there was no answer. At 1037 hours, using a fourth number, he was able to reach a receptionist at radio station WHTS, who stated that she was not located in the studio, and that a radio station technician was not available to process the Whiteside County EBS message due to staff absences. At 1041 hours, the EOC Director simulated reacting a prescripted message to the receptionist, who could not initiate the broadcast of the EBS message. The EOC Coordinator re-contacted the radio station at 1046 hours through the primary (hot line) number, and read the prescripted message into the studio, which was taped and available for broadcast by 1051 hours. The total elapsed time from the decision to the beginning of the broadcast was 26 minutes, thereby exceeding the 15-minute rule (NUREG-0654; E.5, 6,7, AN-1).

Recommendation: The process currently identified for broadcasting simultaneous EDS messages from two jurisdictions is unreliable. Independent procedures must be established to (1) ensure prompt primary and backup communications with the radio station, (2) limit the length of each county's initial message to ensure that each county's broadcast will meet the 15-minute requirement, and (3) establish contact with the appropriate personnel at the radio station well in advance of the initial broadcast so they will be ready to handle each transmission expeditiously. It is also necessary to amend the EBS procedures to identify a backup or secondary contact number at the EBS station that does not rely on the public request line, which staff routinely ignores during emergency activities.

In accordance with 44 CFR 350.9 (d) and FEMA-REP-14, we have thoroughly reviewed and discussed this issue with FEMA Headquarters, the U.S. Nuclear Regulatory Commission, and FEMA Region V's Regional Assistance Committee members. FEMA REP 14, page C.16-1, defines a Deficiency as "... an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant." Because of the potential impact of a Deficiency on the public health and safety, it should be corrected within 120 days after the exercise through appropriate remedial actions, including remedial exercises, drills, or other actions, including plan revisions.

Please coordinate with this office the date and time of the pertinent remedial actions and the identity of State and Whiteside County participants within 10 days from the date of this letter.

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NU.355 P.4 PAGE 04

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Woodie Curtis, Chairperson, Regional Assistance Committee, at (312) 408-5528.

Sincerely,

and the odeshoo

Janet M.Odeshoo Acting Regional Director