

September 19, 1988

Docket No.: 50-322

Mr. John D. Leonard, Jr.
Vice President - Nuclear Operations
Long Island Lighting Company
Shoreham Nuclear Power Station
P. O. Box 618, North Country Road
Wading River, New York 11792

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Dear Mr. Leonard:

SUBJECT: FEDERAL EMERGENCY MANAGEMENT AGENCY REVIEW OF THE OFFSITE EMERGENCY PLAN FOR SHOREHAM

The enclosed letter from Grant Peterson, Federal Emergency Management Agency (FEMA) dated September 9, 1988, is in response to our request of May 23, 1988, for FEMA to review the offsite emergency plan for Shoreham and our request to conduct a full-participation exercise of that plan. The letter transmits the FEMA Region II report on the review of Revision 10 to the SNPS Local Offsite Radiological Emergency Response Plan and the evaluation of the full-participation exercise.

In its finding on LILCO's offsite emergency response plan for Shoreham, FEMA concluded that although seven plan elements were rated inadequate, the exercise held on June 7-9, 1988 demonstrated adequate overall preparedness on the part of Local Emergency Response Organization personnel. Therefore, based on the evaluation of the plan and exercise, FEMA reached a finding of reasonable assurance. FEMA's plan review and exercise evaluation were based on the assumptions that in an actual radiological emergency, State and local officials that have declined to participate in emergency planning will (1) exercise their best efforts to protect the health and safety of the public, (2) cooperate with the utility and follow the utility plan, and (3) have the resources sufficient to implement those portions of the utility plan where State and local response is necessary.

LILCO is encouraged to continue to coordinate with FEMA Region II to ensure that the plan inadequacies and exercise areas requiring corrective action identified by FEMA are corrected in a timely manner. We request LILCO provide a schedule for resolution of these issues.

Sincerely,

/s/

Stewart W. Brown, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II

Enclosures:

1. Ltr. to V. Stello from G. Peterson 9/9/88
2. FEMA Report dtd. 9/8/88

cc: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
September 19, 1988

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Long Island Lighting Company
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Stewart W. Brown, Project Manager
Project Directorate I-2
Division of Reactor Projects I/II

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G. Peterson 9/9/88
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cc: See next page

Mr. John D. Leonard, Jr.
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Long Island Lighting Company

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Washington, D.C. 20472

SEP - 9 1988

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

Dear Mr. Stello:

On January 27, 1988, the Nuclear Regulatory Commission (NRC) requested that the Federal Emergency Management Agency (FEMA) review Revision 9 of Long Island Lighting Company's (LILCO) offsite preparedness plan for the Shoreham Nuclear Power Station (SNPS), under the provisions of the April 1985 FEMA/NRC Memorandum of Understanding and the criteria and assumptions of NUREG-0654/FEMA-REP-1, Rev.1, Supplement 1. FEMA was also requested to provide a finding, i.e., indicate whether in the framework of those criteria and assumptions, FEMA had reasonable assurance that the plans can protect the health and safety of the public living in the vicinity of the plant. That finding was delivered to the NRC on May 31, 1988.

On February 8, 1988, NRC requested that FEMA evaluate a full-participation exercise of LILCO's offsite preparedness plan for Shoreham. On May 20, 1988, and May 26, 1988, NRC staff agreed that the proposed objectives submitted by FEMA on May 13, 1988, were sufficient to demonstrate the capabilities of LILCO's Local Emergency Response Organization in a full-participation exercise. They also stated their position that the objectives were sufficient to constitute a "qualifying" exercise under 10 CFR 50, Appendix E, Section IV.F.1 in that it should test as much of the emergency plans as is reasonably achievable without mandatory public participation.

On May 23, 1988, NRC requested that FEMA conduct a review of Revision 10 of the LILCO offsite plan against the criteria of NUREG-0654/FEMA-REP-1, Rev.1, Supplement 1 and the three assumptions stated below. NRC also requested that Revision 10 changes be incorporated into the exercise play of the upcoming Shoreham exercise. Since a full Regional Assistance Committee (RAC) review could not be conducted in the short time frame remaining before the exercise, FEMA Region II agreed to review the changes, coordinate with the RAC where necessary, and incorporate them into the evaluation of the exercise. The assumptions upon which the plan review and the exercise were based are that in an actual radiological emergency, State and local officials that have declined to participate in emergency planning will:

- 1) Exercise their best efforts to protect the health and safety of the public;
- 2) Cooperate with the utility and follow the utility plan, and
- 3) Have the resources sufficient to implement those portions of the utility offsite plan where State and local response is necessary.

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It is further understood that in any subsequent hearings or litigation related to the plan review or exercise, NRC will defend the above assumptions. On August 31, 1988, you also requested that FEMA review certain updated letters of agreement in conjunction with FEMA's ongoing review of Revision 10.

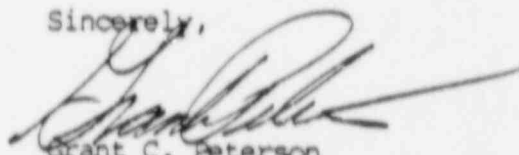
Enclosed is a report on the results of a full review of Revision 10 of the LILCO plan and the abovementioned letters of agreement, conducted by FEMA Region II and the RAC. The Shoreham exercise was conducted on June 7-9, 1988. Enclosed is a copy of the Post-Exercise Assessment, dated September 2, 1988, containing the results of FEMA's evaluation. It was prepared by FEMA Region II. There were no deficiencies identified in the exercise. However, there are some areas requiring corrective action. FEMA is requesting LILCO to submit a schedule of actions that they have taken or intend to take to correct both plan-related and exercise-related inadequacies.

As indicated in the plan review, Revision 10 contains 94 plan elements rated adequate and 7 plan elements rated inadequate. Some of the inadequacies were revealed as shortcomings in the exercise requiring further implementing detail in the plan. However, the exercise demonstrated adequate overall preparedness on the part of LERO personnel, and therefore, based on the evaluation of the plan and the exercise, and the recommendation of FEMA Region II, FEMA has reached a finding of reasonable assurance.

By way of clarification, we would like to note for the record that the enclosed plan review did not reevaluate Elements C.2.b, C.2.c, E.3 and E.4 a-n, since they are to be removed from the final version of NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 1. The review also does not take into consideration any possible ramifications of ongoing litigation in the State of New York concerning LILCO's reception center at Bellmore. Although the Supreme Court of the State of New York, Nassau County, has ruled on that issue, it is our understanding that LILCO is appealing that ruling. Finally, the review also did not consider the so-called ministerial changes listed as part of Revision 11 of the LILCO plan, although incorporated in Revision 1 of the SNPS Prompt Notification and Design Report. You requested that FEMA review that revision to the design report on August 16, 1988. Our consolidated report on the SNPS alert and notification system will contain our evaluation of those changes, unless a full RAC review of any potential Revision 11 of the entire plan is produced first.

We hope that the above information is useful. If you have any questions, please feel free to call me at 646-3692.

Sincerely,



Grant C. Peterson
Associate Director
State and Local Programs and Support

Enclosures
As Stated