

BOSTON ED:SOH

Emergency Preparedness Department  
59 Industrial Park Road  
Plymouth, Massachusetts 02360

September 21, 1988  
EP 88-1160

Mr. Peter W. Agnes, Jr.  
Assistant Secretary of Public Safety  
Commonwealth of Massachusetts  
Executive Office of Public Safety  
One Ashburton Place  
Boston, Massachusetts 02108

Dear Peter:

We are in receipt of your minutes of the August 22, 1988 meeting between Commonwealth officials and NRC Region I representatives. The minutes describe the Commonwealth's impressions of the status of offsite emergency preparedness around Pilgrim Station (as presented during the August 22 meeting), and state that a report for the Governor is currently being prepared on that subject.

Our review of the minutes indicates that the Commonwealth may be under some misimpressions regarding the status of offsite emergency preparedness. Since we are aware that you are engaged in preparing the report to the Governor, I thought it might be useful if I pointed out some of the more important aspects of the minutes which we believe to be in error. I should note, however, that I have not attempted to address every issue raised in the minutes, or to take issue with the Commonwealth's apparent criticisms on the overall adequacy or status of the program. Nevertheless, I felt that providing the comments below might aid you in your effort to compile an accurate report to the Governor.

First, in item 2 of the August 22 minutes, you state that "a completed draft of the Pilgrim plans has yet to be produced." Completed draft plans have, in fact, been developed by each of the five EPZ and two reception center towns and forwarded to the Commonwealth for transmittal to FEMA for informal technical review. As you know, FEMA has commented favorable on each of those reviewed to date and provided specific comments which have been incorporated. In addition, based on our recent conversations, it is my understanding that a revised draft MCDA Area II plan has now been completed and is being forwarded to FEMA as well.

Second, item 3 of the minutes states that the planning process "was designed to initially permit local officials to review draft planning material...."

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This statement suggests that the Commonwealth is "permitting" local officials to merely "review" materials, when in fact such officials have been intimately involved in the preparation of such materials, working closely with Boston Edison representatives for well over a year. It is, of course, the Commonwealth which is undertaking the "review" of the draft planning documents prepared by the towns, with Boston Edison assistance.

Third, item 5 of the minutes states that "most implementing procedures exist in draft form; many have been provided (by BECo) to towns, but have not been formally reviewed or approved." It is important to understand that each of the town implementing procedures was prepared in a collaborative effort with the cognizant local officials and agency heads, and modified until the responsible officials were satisfied with the fidelity of the procedures and indicated so with their signature. The impression left by the quoted segment is that Boston Edison has "provided" materials to the towns with which they are not familiar. On the contrary, the implementing procedures are the product of considerable interaction and cooperation between local officials and Boston Edison.

Fourth, item 6 states that six of seven draft plans have been completed and that "plans and procedures for schools have been completely revised and the local review process is not yet complete." Draft plans for all seven towns are now complete. In addition, the specific reference to the school procedures (there is no separate school plan) creates, in our view, the misimpression that the school program is not as far along as other elements of the revised planning program. This is not accurate since school related planning documents were prepared contemporaneously with other planning documents.

Fifth, item 7 refers to the possibility of a third reception center. Boston Edison did not "recommend" the use of two reception centers, but did assess the feasibility of relying on two and did issue a report summarizing its analysis. We believe that it should be noted that the Commonwealth's feasibility analysis of the proposed Wellesley facility has been underway since March, 1988.

Next, item 9 of the minutes states that the "special needs lists currently in use by local Civil Defense Directors are woefully inadequate ...." Secretary Barry's 1987 report to the Governor stated that "it may not be necessary or prudent to compile exhaustive lists of special needs populations."

In any event, it should be noted that Boston Edison stands ready and willing to commission the new special needs survey to provide information to upgrade the lists as soon as MCDA/OEP forwards the modified Request for Proposal (RFP), and we have received and reviewed the Commonwealth's policy on protection of the special needs population (which is referenced in the RFP). We have been awaiting both the MCDA/OEP modified RFP and the cited policy for some time. In addition, we have encouraged the towns to upgrade their existing lists through telephone contacts with individuals and social service agencies, and are aware that some of the lists have been upgraded. Moreover, we have assisted in the development of Town Implementing Procedures which permit prompt "self-identification" in the event of an emergency. In addition, while we agree with your apparent recognition that there has not been a "lack of progress in planning", we think there are numerous areas where Commonwealth action would most assuredly help speed the planning process.

Next, item 10 refers to agreements "between BECo and private [transportation] providers for emergency response resources." As you know, the form of those agreements is between the providers and the Commonwealth, not Boston Edison. MCDA authored the agreements and MCDA representatives participated in their negotiation. While transportation providers representing a large number of resources have entered into such agreements, the agreements have been in the Commonwealth's hands for signature since March 1988.

Next, while item 13 points out that the Taunton State Hospital and Bridgewater State College reception centers are in need of capital improvements, it should be noted that we have been awaiting authorization from the Commonwealth to begin improvements since December, 1987, when our feasibility study listed what we believed were the appropriate improvements.

Next, item 14 states that Cape Cod (which is outside the EPZ) would be "isolated" in the event of a plant accident. On the contrary, planning provisions call for one of the two bridges over the canal to remain open at all times to provide access from Cape Cod and for the other to be opened at the Commonwealth's discretion.

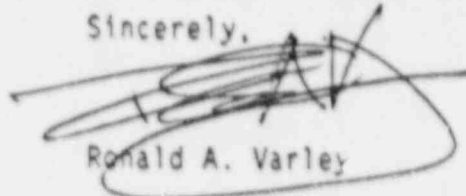
Item 15 refers to "substantial revisions" to the PIB made by the Commonwealth. The numerous revisions made by MCDA, to date, have not in our opinion significantly altered the original format or content, and MCDA has not scheduled a meeting on this issue until October 17.

Finally, item 18 states that an exercise is required before final approval of the plans can be given, and that such an exercise is "premature given the unfinished state of the plans." We believe that given the considerable lead time associated with the preparation for an exercise, it is not at all too early to begin to work toward that objective. While we have broached this subject on several occasions with the Commonwealth, it has been unwilling to act to even initiate the exercise planning process.

Moreover, FEMA has now responded to the two referenced Commonwealth letters, and has commented extensively on the draft local plans. While the program does remain "unfinished" to some degree, this is not due to intransigence on the part of Boston Edison, the towns, or FEMA.

In conclusion, I hope that my comments provide you with useful insights on some of the issues raised in the August 22 minutes and that they will assist you in preparing an accurate report to the Governor. Recognizing the significant progress that has been made in offsite planning over the last year, we look forward to reviewing the Secretary's report.

Sincerely,



Ronald A. Varley

cc: Samuel J. Collins  
William Kerr  
William Lazarus  
Jack Dolan