



**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Plymouth Hill Road  
Plymouth, Massachusetts 02360

**Ralph G. Bird**  
Senior Vice President — Nuclear

October 7, 1988  
BECo Ltr. #88-143

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Docket No.: 50-293  
License No.: DPR-35

Re: Boston Edison Company Comments on Draft  
of "A Report on Progress Made in Emergency  
Planning for Response to an Accident at  
Pilgrim Nuclear Power Station"

Dear Sir:

The enclosed letter was transmitted today to Mr. Agnes of the Commonwealth of Massachusetts Executive Office of Public Safety. It provides Boston Edison's comments on the draft report entitled "A Report on Progress Made in Emergency Planning for Response to an Accident at Pilgrim Nuclear Power Station." This transmittal is for your information.

Please contact Mr. Ron Varley, Manager of Emergency Preparedness, with any questions.

*R. G. Bird*  
R. G. Bird

:caw

Enclosure

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Page Two

cc: Mr. William T. Russell  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region I  
475 Allendale Road  
King of Prussia, PA 19406

Mr. D. G. McDonald  
Project Manager  
Division of Reactor Projects I/II  
U.S. Nuclear Regulatory Commission  
Mail Stop #14D1  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852

Senior NRC Resident Inspector  
Pilgrim Nuclear Power Station



**BOSTON EDISON**

Pilgrim Nuclear Power Station  
Rocky Hill Road  
Plymouth, Massachusetts 02360

**Ralph G. Bird**  
Senior Vice President — Nuclear

October 7, 1988

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

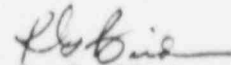
Re: Boston Edison Company Comments on Draft  
of "A Report on Progress Made in Emergency  
Planning for Response to an Accident at  
Pilgrim Nuclear Power Station"

Dear Mr. Agnes:

Enclosed are Boston Edison Company's comments on the draft report entitled "A Report on Progress Made to an Accident at Pilgrim Nuclear Power Station."

Please contact Mr. Ron Varley, Manager of Emergency Preparedness, with any questions.

Very truly yours,

  
R. G. Bird

:caw

Enclosure

BOSTON EDISON COMPANY COMMENTS  
ON THE DRAFT "REPORT ON PROGRESS MADE IN  
EMERGENCY PLANNING FOR RESPONSE TO AN  
ACCIDENT AT PILGRIM NUCLEAR POWER STATION"

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October 7, 1988

## I. INTRODUCTION

On October 1, 1988, Boston Edison Company obtained a copy of the draft "Report on Progress Made in Emergency Planning for Response to An Accident at Pilgrim Nuclear Power Station." Since the draft report states that comments should be submitted before the close of business on October 7, 1988, we have done our best in the short time allotted to provide specific and meaningful comments. Our comments are structured to follow the format of the draft report as closely as possible. After quoting the relevant excerpt from the draft report, we reference the relevant page number, and provide our comments in response.

The dominant theme of the draft report is "that the Commonwealth cannot give reasonable assurance to the public that their health and safety can be adequately protected." (p. 1). This theme is stated or suggested in a variety of ways, each of which appears intended to demonstrate that the "best possible plans to protect the lives and property of people living, working, and visiting the Pilgrim area" (p. 6) do not yet exist.

Based upon the descriptions of progress, or lack thereof, in the draft report, it seems clear that the Commonwealth, although mentioning Federal regulations and guidance several times, is not measuring the program against Federal standards. As a result, we believe that the draft report both understates the degree of progress that has been achieved to date, and overstates the remaining issues to be addressed in the planning process.

For example, the level of planning that has been achieved for the ten mile EPZ is not evaluated in terms of whether or not Federal standards are met. Had that been done, the draft report should have concluded that those standards largely are being met or exceeded. Moreover, the draft report would not have identified as deficiencies the lack of plans and implementing procedures for communities outside of the ten mile EPZ through which evacuation routes to the reception centers pass and the lack of a traffic management plan for these routes outside the EPZ.

Similarly, while the draft report implies that much procedural development remains to be done and that officials may not have been adequately involved in the development process, virtually all of the draft procedures have been reviewed and received concurrence from cognizant agency heads. Moreover, the development process, by involving those who must see to the procedures' implementation, provides a high degree of confidence that the procedures are readily implementable.

In sum, it is Boston Edison's view that the coordinated, integrated manner in which the program has been developed to date has created a higher level of preparedness than is portrayed in the draft report. Our comments below address these matters in greater detail.

We have also provided copies of letters received to date from some of the towns providing comments on the draft report.

II. COMMENTS ON SECTIONS OF THE DRAFT REPORT OF  
GENERAL APPLICABILITY (Draft Report pp. 1-47)

1. [T]he process we are following at Pilgrim since 1980 is akin to the planning process for a newly licensed plant in that a total reconstruction of the plans is underway...(p. 4)

COMMENTS: While the current draft plans and procedures are entirely new documents and provide a level of detail not previously present in the program, we do not believe it is valid to create the impression that no emergency planning "infrastructure" was in place before the current program improvement effort. It is important to recognize that, prior to the issuance of FEMA's Self-Initiated Review (SIR), the program had been demonstrated through exercises on several occasions and found acceptable. Many of the individuals responsible for emergency response at that time continue to have those responsibilities. Moreover, many of the individuals who have newly created responsibilities are bus drivers, police officers, or other persons who would be carrying out duties in an emergency similar to those they carry out on a day to day basis. While the new program does provide extensive and detailed guidance on carrying out the emergency response effort and addresses the FEMA SIR issues, that guidance serves to enhance the preexisting capabilities of the emergency response officials.



2. I also want to take this opportunity to correct a misimpression created by the latest NRC "Systematic Assessment of Licensee Performance" for Pilgrim Station. The Commonwealth of Massachusetts has not joined the Boston Edison Company in seeking an exemption from exercise requirements for Pilgrim Station. (p. 5)

COMMENTS: Before submitting its exercise exemption requests, Boston Edison contacted Commonwealth officials, shared drafts of the request letters and obtained their oral concurrence. The request letters themselves noted that the proposed exemptions were discussed with the Commonwealth and local emergency response officials and that the parties had indicated their concurrence. Copies of both Boston Edison exemption request letters were sent to the Commonwealth at the time they were submitted to NRC in September, 1987 and April, 1988. This was the position of the Commonwealth as we understood it. The Commonwealth provided no indication that their position had changed, in the intervening months, until we received the draft report.

3. [T]he Commonwealth urged and Boston Edison has agreed to provide assistance to local governments for development and possible implementation of local emergency plans. (p.9)

COMMENTS: Boston Edison does not wish to denigrate the role that the Commonwealth has played in the effort to improve the offsite emergency response program. However, we believe that the draft report fails to give appropriate recognition in numerous places to our initiative and efforts in this area. We believe that we have taken the initiative on many issues and have been an active participant in the planning process, rather than merely responding or reacting to directions of the Commonwealth.

While we do not wish to belabor the point, we would like the report to acknowledge that Boston Edison took the lead in the decision to utilize, and in the development of, the various assistance agreements. In fact, the agreements presently in place were modeled after similar agreements entered into by Toledo Edison Company with authorities in the State of Ohio. As you know, Mr. Varley, Boston Edison's Emergency Preparedness Manager, previously served in that role for Toledo Edison's Davis - Besse plant. We do recognize that the Commonwealth directed us to the appropriate authorizing statute pursuant to which the legal agreements were signed.

4. [A]s of this writing we have not received the latest draft traffic management plan for areas ten miles and more from Pilgrim Station. (pp. 11-12)

COMMENTS: The draft report points out, in numerous places, the absence of a set of evacuation time estimates (ETE) and/or a traffic management plan for areas beyond the EPZ. Boston Edison has, of course, provided the Commonwealth and the Towns with an updated and revised ETE and traffic management plan for the EPZ in accordance with applicable federal guidance. The new ETE and traffic management plan (Rev. 0) is dated August, 1988. Those documents reflect the extensive input received on the prior draft from Commonwealth and local officials and the draft report recognizes that they "are superior to any ever done in the Commonwealth" (p. 26).

It is important to clarify, however, that there is no requirement under applicable federal guidance (NUREG-0654, Appendix 4) to develop transit time estimates or a traffic management plan for areas beyond the EPZ. The principal purpose of an ETE is to provide information to be factored into the protective action decision-making process for protection of the population within the EPZ.

There is no need for specific estimates of transit times of persons who have already left the EPZ. We believe that the issue of traffic management from the edge of the EPZ to reception centers is adequately addressed by the placement of the reception centers a sufficient distance away from the EPZ and by general guidance to facilitate traffic flow.

In any event, in our effort to continue to assist the Commonwealth, Boston Edison will be providing a traffic management plan from the EPZ border to the reception centers which will provide additional assurance that traffic delays outside the EPZ do not inordinately impede evacuation from the EPZ. The plan should be submitted by about October 10, 1988.

5. [W]hile local emergency response plans and procedures are not yet complete it is now clear that such significant changes have been made to the system in which they would be implemented in the event of an accident at Pilgrim Station, that we cannot possibly vouch for the effectiveness of the system without a full scale exercise of all plans, personnel, and facilities. (p.12)

COMMENTS: As we discussed above in Comment No. 1, we do not believe it is valid to create the impression that no emergency planning "infrastructure" was in place before the current improvement effort. That effort, by providing extensive and detailed guidance on carrying out an emergency response, and by addressing systematically the issues FEMA identified in its Self-Initiated Review, has enhanced pre-existing capability and not created a wholly new capability that had no existence before.

Moreover, there are numerous means for evaluating the effectiveness of an emergency response program including partial participation exercises, drills, tabletops, and reviews of training. The Federal authorities have, in the past, relied upon these and other evaluation tools. A full scale exercise is not the only method of demonstrating the effectiveness of an emergency response program.

6. [Since revisions to the State Plan are dictated in large part by changes to the local and Area II plans, we cannot consider the state plan ready for technical review by FEMA until all local and Area II plans and procedures have been subject to technical review by FEMA and state authorities. (p.15)

COMMENTS: We do not agree that changes to the State plan are dictated in large part by changes to the local and Area II plans and that, therefore, it is premature to provide the State plan to FEMA for informal technical review. The State plan establishes the broad policies and basic agency functional responsibilities to which the Area II and local plans should adhere. Typically, FEMA review of state plans proceeds contemporaneously with its review of regional and local plans.

Moreover, completion of specific implementing procedures should not be a prerequisite to State plan review. Traditionally, FEMA has not even reviewed specific implementing procedures, and has generally limited its review to State and local plans per se.

7. Each community will also submit a "NUREG 0654 Cross Reference " to demonstrate that all federal regulatory requirements are fulfilled....

On September 6, 1988,... both the Marshfield and Taunton NUREG 0654 Cross-Reference were also forwarded to FEMA. (pp.15-16)

COMMENTS: We believe that this reference to a "NUREG-0654 Cross-Reference" may be an error. All of the current draft plans contain a table cross-referencing plan provisions to the criteria in NUREG-0654. This is consistent with specific guidance set forth in the NUREG.

However, as a separate and more lengthy document, the Town of Marshfield and the City of Taunton forwarded tables cross-referencing their draft plans and procedures to the specific issues set forth in FEMA's SIR. We believe that the text may be confusing the required NUREG-0654 cross-reference tables included in the plans with the "SIR cross-reference tables" that have a distinctly different purpose.

8. Neither the state police nor state DPW procedures are complete because they are dependant on completion and review of the "Evacuation Time Estimate and Traffic Management Plan" which is being produced for the Boston Edison Company. (p. 18)

COMMENTS: It is our understanding that the State Police Troop D and the MDPW District 7 implementing procedures have been reviewed and found acceptable by those agencies. The procedures identify resources, equipment needs, and responsible officials and outline the basic operating premises. The traffic management plan for those areas outside the EPZ, which Boston Edison has agreed to help develop, will establish locations and setup of equipment for each traffic control point outside the EPZ.



9. The only draft implementing procedures which have been submitted to MCDA/OEP for informal state and federal technical review are those of the EPZ town of Marshfield and the host city of Taunton.... (p. 19)

COMMENTS: In addition to the Town of Marshfield and the City of Taunton, the Town of Bridgewater submitted their revised draft plans, procedures and other planning documents to MCDA for transmittal to FEMA on September 27, 1988 and MCDA forwarded those documents to FEMA on September 30, 1988. On October 4, 1988 the Selectmen in the Towns of Kingston and Carver authorized similar submittals. Once MCDA receives the Kingston and Carver submittals, five of the seven towns will have provided their draft plans and procedures for submission to FEMA.

10. [I]t will be impossible to determine if the procedures are sufficient or the best possible until we have received, reviewed, and tested all implementing procedures. (p. 19)

COMMENTS: We do not understand why the evaluation of the sufficiency of the implementing procedures is dependent upon the review and testing of "all" of the procedures. Review of the draft procedures against recognized Federal standards permits a reasonable evaluation of program status to be made.

11. [W]e are awaiting tests to determine if a secure and dependable communications system has been established between and among all local EOCs, the State and Area II EOCs, and with local civil defense directors in the field. This has been addressed in part through a system called BECONS which was provided by Boston Edison. It must be noted that neither implementing procedures for the use of BECONS nor training in the system's operation have been completed, and that a full test of system-wide communications cannot be held until they are. MCDA/OEP is working to produce these procedures and complete requisite training as quickly as possible. (pp. 20-21)

COMMENTS: BECONS received its FCC license and became operational on December 7, 1987. While it is true that BECONS training is not "complete", use of BECONS has been fully incorporated into the appropriate draft town procedures and some personnel have been trained on its use in each town. We also provided a draft procedure to MCDA on September 23, 1988. A lesson plan covering use of BECONS by Commonwealth personnel was forwarded to MCDA for approval in September as well.

12. In discussions between state officials and Boston Edison, it was decided to redesign the off-site initial notification system. (p.21)

COMMENTS: The notification system has been redesigned at the insistence of the towns. The pre-existing system (ringdown system backed-up by BECONS) remains operational and will remain so until the new system is fully operational. We understood from the discussions mentioned above, that the pre-existing system was deemed to be acceptable by the Commonwealth.

13. New equipment has been installed so that notification goes directly from the Pilgrim Station control room to state and local facilities via a dedicated "ring down" telephone. Each state and local facility also will receive "hard copy" confirmation of the event over a dedicated facsimile transmission machine.

While Boston Edison intends to complete installation and testing of system hardware by the middle of October, final procedures for the operation of the new off-site initial notification system have not been developed, nor have personnel been trained in its use, nor has a system-wide test been held. (pp. 21-22)

COMMENTS: While "final" procedures have not been approved by the towns, use of the new additional notification system has been fully incorporated into the appropriate draft town procedures. In addition, training on the use of the system equipment is underway and has been provided to most 24-hour dispatch personnel in each town. A draft procedure and proposed lesson plan were forwarded to MCDA in September.

14. In spite of a study produced by the Boston Edison Company which purported to show that the two reception centers in Bridgewater and Taunton were sufficient, it is determined that a third reception center indeed was necessary to protect the health and safety of the citizens of the EPZ. (p.22)

COMMENTS: Boston Edison's December 23, 1987, "Reception Center Feasibility Analysis", assessed the capability of the Taunton and Bridgewater facilities to monitor the population for contamination in the Pilgrim EPZ in accordance with applicable federal guidance. While the report addressed other aspects of reception center operations, the primary purpose of the analysis was to determine whether the objective of that guidance could be achieved using two, rather than three, reception centers.

The analysis summarized in the report concluded that the Taunton and Bridgewater facilities (with appropriate improvements and equipment procurement) would have the capability of monitoring the requisite number of persons evacuating from the EPZ in the event of an emergency at Pilgrim. While there have since been some changes in specific logistics, the conclusions of the analysis remain valid.

FEMA's informal technical review comments on the draft Taunton and Bridgewater plans stated that:

The Reception Center Feasibility Analysis . . . adequately addresses [the capability to monitor and register evacuees in a 12-hour period].

See FEMA Technical Review - City of Taunton Radiological Emergency Response Plan for Pilgrim (Revision 3, 11-14-87), dated March 29, 1988 at 9; and FEMA Technical Review-Town of Bridgewater Radiological Emergency Response Plan for Pilgrim (Revision 4, March 1988), dated July 27, 1988 at 10.

The draft report states that the Boston Edison analysis "purported" to show that two reception centers could be sufficient and that the Commonwealth has determined that a third is "necessary to protect the health and safety of the citizens of the EPZ." However, the draft report does not provide a technical basis for those statements. Page 67 of the draft report does indicate that the December, 1987 Report to the Governor "documents our [The Commonwealth's] position that a third reception center is essential to protecting the public health and safety."

Our review of the December, 1987 Report, however, has not revealed any technical basis for the Commonwealth's determination. The only reference to a rationale for that determination which we can identify is the statement (on page 31) in the 1987 Report that "the legitimate concern of EPZ residents that their protection has diminished through loss of the Hanover reception center will be taken into consideration throughout this process".



15. MCDA/OEP in cooperation with other state agencies is undertaking a feasibility study to determine if the state DPW facility in Wellesley can in fact adequately serve as a reception center. Part of this feasibility study involves discussions with DPW, DCPO, and BECo officials to determine if Boston Edison can and will develop the operational capability at the site for its full use as a reception center....If the study finds that it is not feasible to use the facility as a reception center, we must then resume the search for an adequate and feasible alternative. (pp. 23-24)

COMMENTS: We would like to reiterate our previously expressed commitment to provide the assistance and resources necessary to support the operational capability of the Wellesley DPW site as a third reception center. The draft report states that part of the feasibility study involves discussions with Boston Edison officials regarding our ability and willingness to help develop the Wellesley site as a third reception center. To date, however, we have not been approached by MCDA or any other Commonwealth officials to discuss specific assistance or resource needs with respect to the Wellesley facility. Finally as discussed in Comment No. 14, even if the Commonwealth concludes that it wishes to resume the search for a new facility, we believe that the two existing reception centers remain an adequate and feasible alternative.

16. Boston Edison, as part of their revisions to the Evacuation Time Estimates and Traffic Management Plan, is investigating the traffic issues attending...use [of the Wellesley DPW facility]. (p. 23)

COMMENTS: The August, 1988 ETE and traffic management plan incorporate and reflect use of the Wellesley DPW site as a third reception center.

17. In the first week of September, 1988, we received a new draft of the ETE, but that draft is not complete, lacking traffic management information on areas beyond the ten mile EPZ. (p. 24)

COMMENTS: As discussed in Comment No. 4, the current ETE (Rev. 0) is complete. However, we have agreed to provide the Commonwealth with the additional traffic management information requested for those areas outside the EPZ.

18. Once the Traffic Management Plan has been evaluated -- and if it is found effective -- implementing procedures must be developed for all authorities responsible for its implementation. These authorities include the EPZ and host community public safety and public works departments, state police and DPW personnel, as well as public safety and public works departments for the communities lying between the EPZ and host facilities. (p.25)

COMMENTS: This portion of the draft report, as written, creates the impression that implementing procedures for traffic control personnel and responsible agencies have not yet been "developed." Draft implementing procedures have been prepared for EPZ and host community public safety and public works departments as well as for state police and DPW personnel.

There are no regulatory requirements to develop procedures for public safety or public works departments in other than EPZ or host communities, and we are aware of no nuclear power plant offsite emergency response programs that incorporate such procedures. However, we have agreed to assist in developing general guidelines governing traffic management in these areas.

19. Section VII of this report includes a listing of unfulfilled equipment requests to the Boston Edison by each town. (p. 26)

COMMENTS: We update the status of the specific equipment items identified in section VII of the draft report later in these comments. However, as a general matter, we believe that there was little effort in the draft report to place these "unfulfilled" requests in the context of the extensive amount of material support that has been offered and provided by Boston Edison to date.

Boston Edison took the initiative to equip each of the EOCs in the EPZ and reception center communities, as well as to renovate them. Standard equipment which Boston Edison provides to EOCs includes backup diesel generators, about 30 chairs and 15 tables each, various radios, status boards, TVs, VCRs, word processors with printers, telephones, facsimile machines, dedicated communications devices, antennas, maps and initial administrative and clerical supplies. Standard equipment needs were determined to ensure conformance with Federal evaluation criteria. The cost of providing standard equipment to each EOC is approximately \$100,000.

Additionally, Boston Edison is supplying radiological equipment for the protection of emergency workers, including dosimeters, TLDs and KI, as well as footlockers in which to store the equipment at each EOC, agency headquarters and reception center.

Boston Edison is also supplying to each reception center thousands of disposable shoe covers, coveralls, gloves, rolls of herculite and various other materials for the conduct of monitoring and decontamination. Additionally, Boston Edison is purchasing 10 portal monitors at a total cost of \$120,000.

Not only does Boston Edison provide the standard equipment described above, but Boston Edison also works with each local agency head to identify, on an individual basis, the specific types of equipment needed by these officials. In obtaining some of these special items, there is often significant lead time associated with their procurement.

Sixty telecommunications devices for the deaf (TDDs) have been purchased and delivered to Civil Defense directors for use in the five CPZ towns. The Civil Defense Directors will distribute them to individuals within the towns who are profoundly deaf. Master transmitter TDDs located at the 24-hour notification points and EOCs have also been procured.

Finally, to implement the Traffic Management Plan (Rev. 0) Boston Edison has purchased hundreds of traffic cones, hundreds of saw horses, and numerous signs and flashing lights for directing traffic flow.

20. [O]ur present estimate is that approximately 6,000 individuals will require more than 25,000 hours of training. As of this writing, we have provided about seventeen percent of total training hours. This does not include training for towns lying between the EPZ and reception communities. (p. 27)

COMMENTS: The training process established by the Commonwealth requires MCDA approval of all lesson plans prior to their use in training. The fact that additional progress has not been made in the conduct of training is due, in part, to the fact that a substantial number of lesson plans are awaiting MCDA approval. Training is being conducted as lesson plans are approved.



21. The plans which were the basis for the last exercise are universally acknowledged to be inadequate, so it must surely follow that a full-scale, off-site exercise has to be held to determine if present plans are adequate. (p. 28)

COMMENTS: Comment No. 5 discusses those methods available for determining the adequacy of an emergency response program, other than a full-scale exercise.

22. We have now designated Marshfield and Carver in their entireties as part of the EPZ for the purpose of emergency planning .....[W]e remain concerned that detailed plans and procedures for all beach areas in Marshfield have not been completed. (pp. 29-30)

COMMENTS: We believe that designation of the entirety of the Town of Marshfield as part of the EPZ does not appropriately recognize the federal regulatory standards calling for an EPZ of "about 10 miles ...in radius." As the Commission indicated in Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), CLI-87-12, 26 NRC 383, 394-95 (1987), only minor modifications to an EPZ are justifiable to account for such issues as "EPZ boundaries that run through the middle of schools or hospitals, or that arbitrarily carve out small portions of government jurisdictions. The goal is merely planning simplicity and avoidance of ambiguity as to the location of the boundaries."

23. [C]ommunities generally feel that they do not have adequate personnel to fulfill all emergency functions detailed in their draft emergency plans. (p.31)

COMMENTS: As discussed in conjunction with our comments on section VII of the draft report, the particular personnel requirements and resources differ from town to town. While some towns may indeed require Commonwealth or other assistance to fully staff all positions with primary and alternate responders, others have yet to fully exhaust existing personnel resources. The draft report does correctly point out that there are a number of sources from which additional emergency response personnel may be recruited (p. 31).

24. Nearly double the anticipated number of buses needed to support emergency response have been identified, and training has been given to some of the drivers. (p. 34)

COMMENTS: To date, over 450 bus drivers have received full, classroom training on their draft procedures and on the use of dosimetry and potassium iodide (KI). This does not, of course, include provision of the additional "hands-on" training developed and being conducted by Boston Edison.

25. [T]he letters of agreement which Boston Edison has proposed that the transportation providers sign has been sent back for revision by the Executive Office of Public Safety because they did not indicate informed consent on the part of the drivers. Several months have passed since Boston Edison agreed to have revised letters of agreement prepared, yet we are still awaiting action on this matter by the Boston Edison Company. (p. 34)

COMMENTS: The draft report first states that the letters of agreement have been "proposed" for signature by transportation providers. In fact, transportation providers controlling over 1,100 buses and numerous other vehicles have documented their willingness to participate in the emergency response program by actually signing these agreements. The agreements signed by the providers were reviewed and approved by MCDA, prepared on MCDA letterhead, and mailed to providers by MCDA. In addition, beginning late last year, MCDA representatives accompanied by Boston Edison officials began visiting individual providers and, in many cases, formally witnessed the providers' signatures.

In any event, the draft report does correctly state that the Executive Office of Public Safety has since concluded that the "informed consent" of the providers and their drivers (with respect to the risks associated with their participation) be documented. Boston Edison is considering proposals for this additional documentation.

26. In my December, 1987 report, it was recommended that Boston Edison conduct a comprehensive survey of special needs populations within the Pilgrim EPZ...

In March of 1988, MCDA/OEP and the state office of Handicapped Affairs fully supported the study proposed to be undertaken by HSRI. However, without consulting either state agency, Boston Edison unilaterally rejected the HSRI proposal. That same month, Boston Edison proposed a study to be conducted by a market research firm. MCDA/OEP opposed this proposal because the firm selected by BECo had absolutely no experience with nor expertise in either special needs issues or emergency preparedness. (pp. 35-36)

RESPONSE: A request for proposal (RFP) was developed by all involved parties in January of 1988 and released for bid. A number of companies, including HSRI, submitted proposals. The HSRI proposals were not unilaterally rejected by Boston Edison. HSRI did not meet the required objectives of the agreed upon RFP and the MCDA representative concurred with the rejection of the proposals.

Since the rejection of the HSRI proposals, Boston Edison has continued to work with both agencies to develop a new RFP. To this goal, we have corresponded with local Civil Defense Directors (June 10) and MCDA (August 2 and September 21) to obtain comments and approval of proposed scopes of work.

We have met with MCDA representatives (August 29) and have reached agreement on a RFP with one exception. Boston Edison is waiting to receive the Massachusetts Special Needs Policy explicitly referenced in the RFP. Once this policy has been received and reviewed, Boston Edison is prepared to move forward to release the RFP for bid.

27. [S]taff of MCDA has been working with the State Office of Handicapped Affairs, Plymouth Commission on Handicapped Affairs, and the Boston Edison Company to develop a mutually agreeable Request for Proposals. We have concluded that work and expect that an RFP will be issued by the middle of October. (p. 26)

COMMENTS: As stated in Comment No. 26, we agree that the RFP is complete with one exception. As written, it explicitly requires the contractor to utilize in its work the Commonwealth's "policy" on special needs. We have asked to review a copy of that policy on several occasions, but have not yet received a copy. We are unable to release an RFP which incorporates reference documents which we have not yet reviewed.



28. In proposed plans, school buses will be moved to staging areas at the "ALERT" emergency level... and authorities retain the option of evacuating the schools at the Alert level. However, plans do not call for announcements over the Emergency Broadcast System nor protective actions for the general population until the next highest emergency level... Thus, parents might not be alerted to the fact that their children had been evacuated until after the evacuation was underway. (p. 38)

COMMENTS: The current planning program calls for letters to be transmitted to parents twice a year that inform parents that their children may be evacuated early in an emergency and which identify the location to which their children would be evacuated. The draft public information brochure refers parents to the letters. In addition, media center press releases can be used to provide this information as well, since the media center is activated at the "ALERT" classification level.

29. The problems concerning evacuation of so remote an area [i.e., Saquish], especially under adverse weather conditions, have not been addressed at this time. For instance, elevating the Saquish access road should be considered if such action would not be prohibited by environmental regulations. During extreme high tides this road is virtually impassable by any vehicle. (p. 43)

COMMENTS: Provisions for the evacuation of Saquish have been incorporated into the draft plans and procedures, and include roles for the Plymouth Police Department, Saquish Special Police, Plymouth Harbor Master, Duxbury Public Works Department, Duxbury Harbor Master and Duxbury Police Department. The Duxbury Police Department has not yet concurred with its draft procedure.

With respect to the "virtual impassability" of the Saquish access road during high tides, that condition occurs on approximately two days a month for about two hours on each occasion. In any event, based upon numerous discussions with the Saquish Association and aerial photography commissioned by Boston Edison, we believe that with the addition of a simple cross-over between the front beach road and back road, full access can be provided to and from Saquish at all times. There are of course details that must be worked out but, we are continuing to discuss this matter with the Saquish Association.

30. [C]ommunications with Saquish and Clark's Island depend upon citizens band radios, and a more dependable communications system must be established. (pp. 43-44)

COMMENTS: Under the current draft planning program, during the summer months, Saquish Special Police are on duty from Friday evening through Sunday evenings as well as holidays. The Plymouth Police Dispatcher will notify the Saquish Special Police via radio at the "ALERT" classification who will then perform route alerting on Saquish. In addition sirens on Saquish and Gurnet will be sounded with a PA announcement by the Plymouth Fire Department. Duxbury Police will also notify Saquish residents once route alerting for recreational areas in Duxbury is completed and the Duxbury Harbor Master will perform additional alerting of Clark's Island.

At the "SITE AREA EMERGENCY" stage, residents and visitors will be advised of a protective action recommended by route alert teams. Sirens will alert residents to tune to EBS for further information. Two tone alert radios have also been provided to the Saquish Association for Association-appointed winter residents to ensure notification via EBS. Multiple communication systems are available for Saquish and Clark's Island residents to be notified in an emergency. We are continuing to work with the Saquish Association on this issue.

31. While we have been most concerned about available shelter for highly vulnerable beach population, we also want to be certain that viable shelter is available for anyone living, working or visiting anywhere within the ten mile EPZ. (p. 44)

COMMENTS: A comprehensive "shelter implementation program" exceeding applicable regulatory requirements has been developed by Boston Edison at Pilgrim. The program will ensure that persons on the beaches and at other major outdoor recreational areas as well, are adequately protected in the event of an emergency at Pilgrim. Boston Edison has entered into LOAs with private building owners to formalize agreements for their use, or obtained municipal authorizations for buildings owned by the towns. Boston Edison has sought and obtained LOAs and municipal authorizations in each of the EPZ towns and only a few such agreements remain outstanding.

With regard to providing viable sheltering for "anyone living, working or visiting anywhere within the ten mile EPZ", Boston Edison notes that there is no NRC or FEMA regulatory requirement requiring this type of sheltering. NRC caselaw notes that.

[S]heltering is a protective action consisting of doing the best you can with what you have. We are not talking about ensuring that everyone has a basement, or lives in a fallout shelter.

Commonwealth Edison Co. (Byron Nuclear Power Station, Units 1 and 2), LBP-84-2, 19 NRC 36, 269 (1984). In Philadelphia Electric Co. (Limerick Generating Station, Units 1 and 2), LBP-85-14, 21 NRC 1219, 1303 (1985), the Licensing Board stated:

There is no provision... which requires an individualized evaluation of buildings to determine their adequacy for sheltering... If the [responsible state agency] were to undertake such evaluations, its ability to make protective action recommendations would not be enhanced because the individual protective value of a building has no bearing on the decision to shelter or evacuate.

Furthermore, FEMA in an August 22, 1988 letter to Charles V.

Barry stated that:

[T]he NRC Staff has advised FEMA that its interpretation of NRC emergency planning regulations is that regulations do not require that sheltering be provided for all accidents, at all times, and at all locations within the plume exposure pathway EPZ. (August 22, 1988 FEMA Letter at 3-4.)

The shelter implementation program developed with Boston Edison's assistance exceeds applicable regulatory requirements for sheltering individuals within the Pilgrim EPZ.

32. As of this writing, only the Town of Marshfield has submitted a Shelter Utilization Plan for informal technical review by state and federal authorities. Therefore, we cannot yet say that adequate shelter is available for the entire EPZ. (p. 45)

COMMENTS: Although the Marshfield Shelter Implementation Program description is the only one forwarded to MCDA to date, the Kingston and Carver Boards of Selectmen authorized submission of their Shelter Implementation Program descriptions to FEMA for informal technical review on October 4, 1988.

In addition, as stated in Comment No. 31, LOAs and municipal authorizations sought by Boston Edison have been obtained in each of the EPZ towns and only a few remain outstanding. We believe that the shelter implementation program exceeds regulatory requirements for sheltering individuals within the Pilgrim EPZ.

33. Traffic management... must be implemented by all communities lying between the EPZ and the host communities. Up to 35 communities would implement traffic management if the Wellesley State DPW facility is designated as a northern reception center. (p. 46)

COMMENTS: As stated in Comment No. 4, there is no requirement to develop a traffic management plan for communities between the EPZ and the host communities. However, Boston Edison has committed to, and is developing, a traffic management plan for this area.

34. [T]he September, 1988 draft [ETE and traffic management plan] is incomplete; it does not contain any traffic management evaluation and recommendations for areas beyond the ten mile EPZ. (p. 47)

COMMENTS: The August, 1988 ETE and traffic management plan is complete.

The additional evaluation requested by the Commonwealth is being provided, but is not required or appropriate for inclusion in the ETE.



III. COMMENTS ON TOWN SPECIFIC PORTIONS OF THE DRAFT REPORT  
(Draft Report pp. 47-62)

A. Bridgewater (Draft Report pp. 50-51)

35. Bridgewater officials have indicated to us that they are concerned that the town may not be able to recruit sufficient staff to fulfill all emergency response functions. Once plans and procedures are complete, a full inventory will be made of manpower needs and the state will work with Bridgewater on a plan to fill all roles with assistance from state agencies and other sources. (p. 50)

COMMENTS: Boston Edison has been working with Bridgewater officials for several months to assess and address manpower needs. Based upon our discussions with those officials, it is our understanding that sufficient personnel are available to meet manpower requirements and that personnel will be formally appointed to these positions.

36. Bridgewater public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- 11 radios for the police department
- 15 radios and 2 antennas for the fire department
- 30 personnel pagers for the fire department
- traffic management equipment as detailed in the traffic management plan, and
- Storage van for equipment (p. 51)

COMMENTS: The status of the specific items listed above is as follows:

1. Police Department Radios - These were delivered during the last week of September.
2. Fire Department Antennas and Radios - These are scheduled to be shipped from the manufacturer by October 21.
3. Fire Department Personnel Pagers - These have not been purchased yet.
4. Traffic Management Equipment - Boston Edison is storing the traffic management equipment ordered until the arrival of the storage van, after which time the equipment will be delivered to the town.
5. Storage Van - The storage vans are on order.

In addition, it should be noted that Boston Edison identified a great deal of specific equipment for use in the Bridgewater EOC which has been purchased and delivered.

B. Carver (Draft Report pp. 51-53)

37. The EPZ Town of Carver has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP has discussed the results of these reviews with Carver officials. However, Carver has submitted neither implementing procedures nor a shelter utilization plan for review. (pp. 51-52)

COMMENTS: On October 4, 1988 the Town of Carver Board of Selectmen authorized the submission of their draft procedures and shelter implementation program description to FEMA for informal technical review. The Town of Kingston Board of Selectmen took similar action on October 4. Five of the seven towns have authorized submission of their draft procedures and other planning documents for review.

38. Carver public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- 2 radios for school buses
- Radios for Council on Aging buses
- One generator for the Council on Aging
- 5 remote radios for the Fire Department
- 15 radios for the Police Department
- Traffic management equipment, and
- Storage van for equipment (pp. 52-53)

COMMENTS: The status of the specific items of equipment identified above is as follows:

1. School Bus Radios - Three radios were installed in school buses on September 28, 1988.
2. Council on Aging Bus Radios - A request for radios for Council on Aging buses was approved and an order was placed with the Motorola Co. with delivery expected soon.
3. Council on Aging Generator - A generator has not been purchased.
4. Remote Radios for Fire Dept. - The Fire Chief will be providing to Boston Edison his advice on the particular remote radios to be purchased. As soon as Boston Edison receives the information, the order will be placed.
5. Police Department Radios - This is a very recent request that has not yet been reviewed.
6. Traffic Management Equipment - Boston Edison is storing this equipment until the storage vans arrive, after which time the equipment will be delivered.
7. Storage Van - This is on order.

In addition, Boston Edison has identified a great deal of equipment for use in the Carver EOC that has been purchased and delivered.

C. Duxbury (Draft Report pp. 53-55)

39. The EPZ Town of Duxbury has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Duxbury officials. However, Duxbury has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 53)

COMMENTS: In Duxbury, 38 of 40 draft procedures have received concurrence from the responsible individuals. Many must still be reviewed by the town RERP Committee. All of the municipal authorizations for shelters in Duxbury have been signed.

40. Duxbury public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- Radios for the police department
- One generator for the police department
- Loran radio for the Harbor Master
- Traffic management equipment, and
- Storage van for equipment (pp. 54-55)

COMMENTS: The status of the specific items of equipment identified above is as follows:

1. Police Department Radios - These have been delivered.
2. Police Department Generator - The Duxbury EOC, located in the Fire House, received a new generator. The generator originally at the Fire House, will be delivered to the Police Department. The Police Chief has accepted this arrangement so that a new generator for the Police Department will not be necessary.
3. Loran Radio - Not one, but two, Loran Radios have been delivered to the Harbor Master.
4. Traffic Management Equipment - Boston Edison is storing the equipment until the storage van arrives, at which time the equipment will be delivered to the town, upon the town's authorization.
5. Storage Van - The storage vans are on order.

In addition, Boston Edison has identified a great deal of equipment for use in the Duxbury EOC. This equipment has been purchased and most has been delivered.

41. EOC renovations at the Duxbury fire house have not been completed.  
(p. 55)

COMMENTS: EOC renovation is essentially complete, aside from small items and the installation of the radio equipment for the Communications Room and the Town Dispatcher's Area. Discussions regarding installation are underway.

D. Kingston (Draft Report pp. 55-56)

42. The EPZ Town of Kingston has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Kingston officials. However, Kingston has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 55)

COMMENTS: On October 4, 1988 the Kingston Board of Selectmen authorized submission of their draft procedures and Shelter Implementation Program description to FEMA for informal technical review.



43. Kingston officials have informed us that in 1990, Route 106, a prime evacuation route, will be rebuilt and no alternate plans for the duration of construction have been developed. (p. 55)

COMMENTS: Boston Edison has met with Kingston Civil Defense officials on this issue. However, this issue is the type of matter that will be appropriately addressed and incorporated through periodic ETE revisions. As the details of the construction become available, contingency evacuation plans for rerouting traffic during the reconstruction of Route 106 will be drafted, following consultation with representatives of the Civil Defense Agency, Highway and Police Departments, and prior to the beginning of roadway work. Appropriate maps will be drafted, also, well in advance of construction.

44. Kingston public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- Radio for the Civil Defense Agency
- 20 radios for the police department
- 6 radios for the fire department
- 1 repeater
- 1 antenna
- 2 blue light bars for Harbor Master
- Traffic management equipment, and
- Storage van for equipment (p. 56)

COMMENTS:        status of the specific items of equipment identified above is as follows:

1. Radio for CD Agency - This was delivered on September 30, 1988.
2. Police Department Radios - Ten of the twenty radios were delivered on September 28, 1988. The other ten are on order.
3. Fire Department Radios - The six radios are on order.
4. Repeater - This item has not yet been reviewed.
5. Antenna - The television antenna has not yet been ordered.
6. Light Bars - The Harbor Master has not requested light bars.
7. Traffic Management Equipment - Boston Edison is holding this equipment in storage until the storage vans arrive, at which time the equipment will be delivered.
8. Storage Van - The storage vans are on order.

In addition, Boston Edison has identified a great deal of equipment for use in the Kingston EOC. This equipment has been purchased and most has been delivered.

E. Marshfield (Draft Report pp. 57-59)

45. Marshfield officials are particularly concerned because, while only one school is within ten miles of Pilgrim Station, they feel that it might be advisable to evacuate all schools if an emergency was so severe as to require evacuation of any children. (p. 57)

COMMENTS: The purpose of any protective action recommendation is to reduce dose to the population. Such a recommendation to evacuate within all or part of the EPZ would be directed toward achievement of this dose minimization goal. Ad hoc evacuation of others, outside the EPZ or in a subarea of the EPZ where evacuation was not recommended, not only would not promote dose minimization, but could, in fact, hinder achievement of that goal.

46. The Marshfield Superintendent of Schools has expressed reservations about the plans under development. The last time the Superintendent reviewed plans and procedures was in 1987, at which time some schools were to be evacuated to Marshfield's Governor Winslow School which is only fourteen miles from Pilgrim Station. The Marshfield Superintendent received three implementing procedures from BECo in July, but no one has since told him what to do with them and he has not reviewed them. It is possible that other Marshfield authorities independently have reviewed and approved school plans and implementing procedures. (p. 57)

COMMENTS: In fact, Dr. MacDonald, the Assistant School Superintendent, has concurred in the draft School Procedure and has been Boston Edison's primary contact on school-related issues. We have been working closely with Marshfield officials, and this is the first indication that the Marshfield Superintendent may not be fully aware of the program.

The concern also contains a factual error. The Governor Winslow School is just within the ten mile EPZ, not 14 miles away. Thus, draft implementing procedures do not call for evacuation of school children to that school. Rather, the Governor Winslow School is one of the schools for which an implementing procedure has been developed, covering alert and notification, evacuation and sheltering for school children in an emergency.

47. Marshfield public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- EOC construction is not complete
- Traffic management equipment, and
- Storage van for equipment

It should be noted that since EOC renovations which BECo is making in Marshfield have just begun, so unanticipated equipment needs are likely to arise. (p. 59)

COMMENTS: The status of the specific items identified above is as follows:

1. EOC Construction - Estimated completion of construction is mid-December, 1988.
2. Traffic Management Equipment - Boston Edison is storing the equipment until the storage vans arrive, after which time the traffic management equipment will be delivered to the town.
3. Storage Van - The storage vans are on order.

Finally, "unanticipated equipment needs" are not likely to arise since EOC equipment should be similar to that already provided for the other town EOCs.

F. Plymouth (Draft Report pp. 59-61)

48. The EPZ Town of Plymouth has submitted a draft plan for informal technical review by state and federal authorities, and staff of MCDA/OEP have discussed the results of these reviews with Plymouth officials. However, Plymouth has submitted neither implementing procedures nor a shelter utilization plan for review. (p. 59)

COMMENTS: While the draft Plymouth procedures and Shelter Implementation Program description have not yet been submitted for informal review, it should be noted that 87 of 90 draft procedures have received concurrence by responsible agency heads or facility administrators, and most of the shelter LOA's and municipal authorizations have been obtained.

49. [I]t is possible that special equipment will be needed to communicate with and respond to this remote area [Saquish Neck]. (p. 59)

COMMENTS: This is addressed above in Comment No. 30.

50. Plymouth public safety officials have indicated to us that they have requested the following equipment from BECo which has not been supplied as of this writing:

- 135 Minotaur pagers for the fire department
- Personnel pagers for civil defense staff and selectmen
- 2 radios for the police department
- Blue light bars for Harbor Master's boat
- Facsimile transmission machine for Selectmen's office
- Traffic management equipment, and
- Storage van for equipment (pp. 60-61)

COMMENTS: The status of the specific items of equipment identified above is as follows:

1. Minotaur Pagers - Meetings have taken place between the Fire Department and Motorola on the pagers. The Fire Chief is aware that procurement of the equipment is awaiting the provision of system specifications.
2. Personnel Pagers - Paging system specifications for the Town of Plymouth are currently in draft.
3. Police Department Radios - These radios are for the Beach Conservation Officer who is a member of the DPW - Parks Department. The equipment is on order and delivery is anticipated for the end of October.
4. Blue Light Bars - This equipment is on order.
5. Facsimile Transmission Machine - This equipment was delivered to the Civil Defense Director on September 30, 1988.
6. Traffic Management Equipment - This equipment is in storage with Boston Edison. It will be delivered when the storage vans arrive.
7. Storage Vans - These are on order.

In addition, Boston Edison has identified a great deal of equipment for use in the Plymouth EOC. This equipment has been purchased and most has been delivered.



G. Taunton (Draft Report (pp. 61-62))

51. The reception center will be at Taunton State Hospital. The physical alterations necessary to develop the actual operational capability for the hospital to function as a reception center have not yet begun as of this writing. (p. 61)

COMMENTS: The Taunton Civil Defense Director has provided a letter of comment which is attached. However, Boston Edison has been meeting with Massachusetts DCPO on facility renovation issues.

52. The Taunton Civil Defense Director has expressed his concern that plans are being made to provide services for only 20% of the EPZ population in the event of an emergency at Pilgrim. If any more people than established in the planning basis request assistance at the Taunton reception center, their needs -- especially for radiological monitoring and decontamination -- can only be served on an "ad hoc" basis. (pp. 61-62)

COMMENTS: The Taunton Civil Defense Director has provided a letter of comment which is attached.

IV. ADDITIONAL COMMENTS ON THE RESPONSE TO THE SEPTEMBER 21, 1988 LETTER FROM R. VARLEY (Draft Report pp. 62-74)

53. [O]nly two communities feel sufficiently comfortable with their implementing procedures to have requested informal technical review by state and federal authorities. (p. 66)

COMMENTS: As of September 27, 1988, three communities (Marshfield, Taunton and Bridgewater) had delivered their draft implementing procedures to MCDA with requests for informal FEMA technical review. On October 4, 1988, two more towns (Kingston and Carver) authorized such action. Thus, only two towns have not yet authorized the submittal of their draft procedures to FEMA.

54. SECo's analysis did indicate that there was no need for a third reception center, however, my December, 1987 report documents our position that a third reception center is essential to protecting the public health and safety. (p. 67)

COMMENTS: Comment No. 14 addresses this issue.

55. Mr. Varley fails to mention that in March, 1988, Boston Edison unilaterally and against our strong advice rejected a proposal by the Cambridge firm of HSRI to do a comprehensive study of special needs populations in the Pilgrim EPZ. (p. 68)

COMMENTS: Comment No. 26 explains our basis for rejecting the HSRI proposal and points out that the MCDA representative concurred in our decision.

56. MCDA/OEP has been able to develop an RFP which has the support of constituent groups; it was delivered to BECo on September 23. It is our hope that BECo will finally join with the other concerned parties in agreeing to an approach to this issue and cooperation in its solution. (p. 69)

COMMENTS: As we stated in Comment No. 27, we believe it is reasonable for Boston Edison to have the opportunity to review MCDA's policy on special needs (which is explicitly referenced in the RFP) before releasing the RFP for bid.

Secondly, we do not believe it is fair to suggest that we have not been "cooperating" in the resolution of this issue. As discussed in Comment No. 26, since January we have undertaken considerable effort to collaborate in the development of the special needs study.

57. BECo drafted the letters of agreement which were signed by transportation providers and then forwarded to MCDA/OEP for signature. (p. 70)

COMMENTS: Comment No. 25 addresses this issue.

58. [W]e do not believe that an exercise can or should be considered until we have neared completion of all emergency response plans and procedures, and have had the opportunity to train all personnel with a role in the plans. We believe this report documents that we are nowhere near that state.

The process to hold an off-site exercise takes approximately 100 days. The licensee -- BECo -- would be responsible for many of the advanced preparations such as scenario development, and these activities can be initiated by the licensee if BECo so wishes. (pp. 73-74)

COMMENT: Our Comment No. 5 addresses the first paragraph of this item.

We are committed to, and have been carrying out, an aggressive and very ambitious training program. However, due to personnel turnover and other similar issues, it is almost impossible for "all" persons to be trained before the conduct of an exercise. It is not at all uncommon for training to continue after an exercise. Therefore, we believe that completion of all training should not be a prerequisite to discussions with the Commonwealth on the scope and projected schedule for an exercise. We appreciate the opportunity to begin the exercise planning process and will initiate the activities referenced in the draft report.



V. COMMENTS ON TECHNICAL ISSUES (Draft Report, pp. 74-75)

Section IX, Technical Issues, raises no technical issues that have not been previously raised and addressed. The technical issues raised in Mr. Barry's letter of September 6, 1988 to Dr. Kerr of the ACRS were explicitly addressed by the ACRS during its September 8, 1988 public meeting, as reflected in the publicly available transcript of that meeting. Apparently, these issues were not included in the ACRS letter to the Chairman of the NRC because the ACRS did not believe they represented unresolved technical issues relevant to the restart of Pilgrim.



ROBERT C. SPEARIN  
DIRECTOR

CITY OF TAUNTON  
DEPARTMENT OF CIVIL DEFENSE

CITY HALL  
15 SUMNER STREET  
TAUNTON, MASSACHUSETTS 02780

October 5, 1988

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

Dear Mr. Agnes:

On Monday October 3, 1988 my office received a draft copy of a document entitled "A Report on Progress Made in Emergency Planning for Response to an Accident at Pilgrim Nuclear Power Station". Comments were requested by October 7, 1988. This is an extremely short turnaround time for a report that is over 100 pages in length. Our comments are, by necessity, based on a very cursory review.

Specific comments are as follows:

1. Section VII.G, page 61, pertains to Taunton. In the second paragraph of that section it refers to the fact that renovations to Taunton State Hospital have not been undertaken. It is only fair to point out, that Boston Edison has been prepared to conduct these renovations for quite some time, pending authorization by State DCPO. Further, I have stated that I would use at least some portions of this facility in an emergency even if the renovations were not complete.
2. The last paragraph of Page 61 states that, "the Taunton Civil Defense Director has expressed his concern that plans are being made to provide services for only 20% of the EPZ population..." and that anything over 20% would be addressed on an "ad hoc" basis. This paragraph in no way reflects the statements I made during my interview with Mr. Agnes.

The Taunton plans and procedures were drafted to meet NUREG-0654 and FEMA guidance memoranda as they pertain to receiving, monitoring and decontamination of evacuees. I am fully aware of the planning criteria, support it, and feel my plans are more than adequate. In fact, after being questioned repeatedly at that meeting by MCDA officials I mentioned that I felt confident our emergency personnel could handle more than the 20% planned.

"Ad Hoc", is not an appropriate term since existing plans and procedures establish a framework and planning basis for expanded emergency operations.

Mr. Peter Agnes, Jr.  
October 5, 1988  
Page Two

By way of more general observations regarding the report, it appears to grossly understate the working relationship of Boston Edison emergency response personnel and the City and overstates the role MCDA has played in determining response policy, strategy and problem solving. Further, the report tends to stress perceived problems and neglects to highlight the progress made to develop comprehensive plans and procedures, initiate a training program, construct emergency operations centers and put needed equipment in place. Although this program is not complete, it is certainly well-established and moving in a positive direction. There are no outstanding program issues that we feel would interfere with implementation of workable plans and procedures.

Sincerely,

*Robert C. Spearin*  
Director

cc: Mayor  
R. Varley



866-5219

# TOWN OF CARVER

## CIVIL DEFENSE

Carver, MA 02330



October 5, 1988

Mr. Peter Agnes, Jr.  
Assistant Secretary  
Executive Office of Public Safety  
One Ashburton Place  
Boston, Massachusetts 02018

Dear Mr. Agnes:

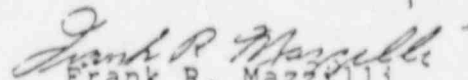
The draft report on the status of Pilgrim emergency planning should incorporate the following updates:

1. Section VII. B should be updated to reflect that on October 4, the Carver Board of Selectmen authorized submittal of an updated plan, implementing procedures, and shelter implementation plan to MCDA and FEMA.
2. Clarification of our position on access control during an evacuation may be necessary (referenced on page 52). We realize there may be a need for residents working out of town to return home to pick up family members in an emergency. We will strictly control access to Carver immediately following an evacuation recommendation, but during the first hour or so residents would be able to return for family members. After the first hour or so after the evacuation notice, however, both the Police Chief and I feel strongly that no return to the evacuated area will be allowed except for emergency personnel.
3. Regarding school committee sign-off of procedures, the school committee chairman has authorized all procedures to be forwarded for state and federal review.
4. With regard to equipment -
  - The three school bus radios were installed 9/28/88.
  - Radios for Council on Aging have been ordered by BECo with delivery expected soon.
  - BECo is awaiting additional information from the Fire Chief to order the remotes.
  - 15 radios for the Police Department is a recent request and we are awaiting an answer from BECo.
  - BECo has ordered the storage vans with delivery expected soon.

Mr. Peter Agnes, Jr.  
October 5, 1988  
Page Two

We would appreciate your prompt review of the plans and procedures soon to be submitted so that we may move forward with our EP program. Training is now being scheduled with key response groups and we look forward to working with MCDA and BECo in an exercise and drill program to test our plans.

Sincerely,

  
Frank R. Mazzilli  
Carver CD Director

FRM/hmc

cc: Selectmen  
Dick Finn BECo✓



# TOWN OF KINGSTON

CIVIL DEFENSE  
OFFICE OF EMERGENCY PREPAREDNESS

6 Maple Avenue  
Kingston, Massachusetts 02364

Phone 617-585-3135

Telefax 617-585-7624

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

October 5, 1988

Dear Mr. Agnes:

As requested, we have reviewed the draft report provided to Kingston Civil Defense on October 1, and have the following comments:

1. In reference to Section VII.D, paragraph 1, page 55, it should be noted that on October 4, 1988, the Selectmen voted to submit the revised plan incorporating FEMA and state comments, as well as the implementing procedures and Shelter Implementation Plan to MCDA and FEMA for informal technical review.
2. Kingston Civil Defense and other public safety officials are continuing their scrutiny of the ETE and judgments on it are not complete. In addition, Boston Edison has committed to working with Town officials - in conjunction with its Traffic Consultants - to investigate the consequences of proposed reconstruction to an evacuation route (Route 106) in future ETE analyses.
3. The state's position on teacher participation is understood and appreciated. We will share this portion of the report with our school officials.
4. Although in your meetings with us you requested information on equipment that has not been provided by Boston Edison, in all fairness it should be pointed out that much equipment has been provided to date, and we are confident that all equipment previously approved for purchase will be made available shortly.

Overall, we feel we have established excellent working relationships with all parties to the PNPS planning process and look forward to continuing in this process. Our RERP program is improving the level of emergency preparedness in the Town of Kingston to respond successfully to any emergency, not just a radiological one.

Sincerely,

Fred Woodworth  
Civil Defense Planner

cc: Selectmen  
Robert Reed, Town Manager  
Ron Varley, Boston Edison