

# NUCLEAR REGULATORY COMMISSION WASHINGTON, D.C. 20555

November 18, 1988

MEMORANDUM FOR:

Betsy Shelburne, Chief

Public Document Room

THRU:

Sandy Showman, Chief

Correspondence and Records Branch

FROM:

Andrew Bates, Chief

Operations Branch

SUBJECT:

RELEASE OF DOCUMENT TO PDR

Attached for placement in the PDR is a copy with all enclosures of:

EDO memo dated November 15, 1988 "Pilgrim Status Update"

This document is being placed in the PDR at the request of the staff and concurrence of the Commission offices.

Attachment: As stated

cc: DCS - P1-124

DFO!

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## UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON, D. C. 20555

November 15, 1988

MEMORANDUM FOR .

Chairman Zech

Commissioner Roberts Commissioner Carr Commissioner Rogers Commissioner Curtiss

FROM:

Victor Stello, Jr., Executive Director

for Operations

SUBJECT:

PILGRIM STATUS UPDATE

At the October 14, 1988, Commission Meeting to discuss the Pilgrim Nuclear Power Station, the staff committed to continue to assess progress, particularly in the area of emergency preparedness.

Subsequent to the meeting, the Commission has received statements from various officials that the staff was not accurate regarding its factual representations on the status of emergency preparedness and that the staff had not met with local officials to obtain their emergency preparedness concerns. Enclosures 1 and 2 respond to these statements. Enclosure 1 is the October 14, 1988, meeting transcript pages 78-104 annotated with the clarifying remarks I provided to the Commission on October 21, 1988 and footnotes to provide the basis for factual information, not already supported. Enclosure 2 identifies meetings where the staff and state, local officials, and/or members of the public were present and at which emergency preparedness issues were raised. Meeting participants and the subjects discussed are also identified.

In order to continue to assess progress and further ensure that the factual basis on which the staff relied in making its recommendation was accurate, the staff met with each of the EPZ community Civil Defense Directors and again toured the local beaches this time with the responsible local official. Enclosure 3 summarizes the staff's findings and attaches each meeting summary. Each official has verified the accuracy of the staff's respective meeting summary. The Commonwealth was notified regarding these meetings and had an observer present at several of the meetings. The Commonwealth did not desire a one-to-one technical meeting with the staff.

The staff is not aware of any new information related to emergency preparedness which would change its recommendation regarding Commission approval of a controlled and phased startup of the Pilgrim Nuclear Power Plant over the next 4-6 months. The staff has evaluated progress for each of the

deficient areas identified by FEMA in their self-initiated review and concludes that substantial and significant progress has been made and is continuing.

As of November 7, 1985, all restart open items are resolved and the plant is physically ready for restart with one exception related to recently identified loose anchor bolts for containment penetration pipe supports. The licensee is continuing its evaluation of this problem and has indicated that they would not restart until it is satisfactorily resolved. NRC Region I staff will independently review this issue prior to Regional Administrator release from the first NRC holdpoint (rod withdrawal for criticality) in the power ascension program subject to Commission authorization to restart.

The staff's review of the Barry Report is being transmitted concurrently. Our review of the report has not identified anything that would change the recommendation.

Victor Stello,

Executive Director for Operations

Enclosures: As stated

cc: SECY

## ENCLOSURE 1

### Contents

- 1. Transcript pages 78-104
- 2. Transcript References
- Letter, Lando W. Zech, Jr. to Peter W. Agnes, Jr., dated October 27, 1988, transmitting the October 14, 1988 Commission Meeting transcript and additional clarifications.

- the off-site plans, and the NRC staff has observed the

  demonstration of some key elements of the plans. We'll discuss

  those details in a moment. Boston Edison, as you heard, has
- spent \$10 million already on improvements to the plans and
  facilities in the local communities. They intend to spend

6 about \$5 million more.

Nonetheless, we recognize that there is more work that needs to be done before we can receive a FEMA finding of adequacy. In some cases, Massachusetts wants to go beyond NRC requirements. We don't object to that, of course, but it does delay the state in finalizing the plans. The next steps are that the state will have to submit final plans to FEMA. FEMA must review them and approve them and schedule an exercise.

The state and the licensee and FEMA and the NRC then must conduct the exercise. If there are any deficiencies, they must be corrected. Finally, we would get a formal report from FEMA to the NRC of the finding of adequacy. We estimate that it would take about six months after Massachusetts submits the final plans before we could receive such a formal FEMA finding.

In the meantime, the staff believes that we have sufficient information to come to our own conclusions concerning the significance of the outstanding issues, pending completion of the formal FEMA process. The last full exercise, as I mentioned, was in 1985. We have issued an exemption to the regulation requiring a full participation exercise every

- 1 two years.
- Of course, we cannot schedule an exercise until the
- 3 Commonwealth of Massachusetts submits revised plans to FEMA.
- 4 Ron Bellamy will now summarize the improvements that have been
- 5 made in the plans and the NRC observations of these
- 6 improvements.
- 7 CHAIRMAN ZECH: Thank you very much. You may
- 8 proceed.
- 9 MR. BELLAMY: Thank you, Mr. Chairman. I am the
- 10 regional branch chief with the responsibility for the review of
- 11 emergency preparedness issues. Next month will complete six
- 12 years that I have been charged with that responsibility. If
- 13 you'll turn to the next slide, the next slide will discuss the
- 14 status of emergency preparedness.
- 15 [Slide.]
- MR. BELLAMY: Although emergency preparedness was not
- 17 an issue of the Pilgrim plant shutdown in April, 1986, the NRC
- 18 staff has continuously monitored the status of emergency
- 19 preparedness. The Federal Emergency Management Agency began
- 20 their selt-initiated review in September of 1986, due to a lack
- of progress toward resolution of document concerns. The FEMA
- 22 self-initiated review was issued in August 1987, and identified
- 23 six specific issues: [the lack of evacuation plans for certain
- 24 public and private schools and daycare centers; the lack of a
- 25 reception center for people evacuating to the North; the lack

1	of identifiable shelters for the beach population; inadequate
2	planning for the evacuation of the special needs population;
3	inadequate planning for the evacuation of the transportation
4	dependent population and an overall lack of progress and
5	planning and apparent diminution in emergency preparedness.]2

Edison Company by the staff and a written plan for resolution was received by the staff on September 17, 1987.] Based on these FEMA identified deficiencies, FEMA in its report, withdrew its interim finding of advaguacy for off-site emergency preparedness and concluded that there was no longer adequate assurance that public health and safety could be protected. This previous finding of adequacy was based on plans and procedures being in place, and demonstration of the implementation during full-scale exercises.

L'n order to assess progress, the NRC staif has reviewed local plans and procedures, discussed the issues with FEMA Region I staff, Commonwealth officials, local town. emergency planning officials, local residents, and Boston Edison representatives.] We have attended numerous public meetings in the area and have toured the area, with special emphasis on the beaches and the local emergency operating centers.]

[Considerable progress toward resolution of the issues pertaining to the schools and daycare centers, the special

needs population and the transportation dependent population is

evidenced by the drafts of plans and implementing procedures

that have been prepared. Draft plans for all five communities

within the ten-mile emergency planning zone, as well as plans

for the two reception communities have been sent to the

Commonwealth and from the Commonwealth to FEMA for a technical

review.

Implementing procedures for three of the EPZ communities and the two reception communities have also been forwarded to the Commonwealth and of these, the procedures for one of the EPZ communities and the two reception communities have been forwarded to FEMA for a technical review. The Massachusetts Civil Defense Agency Area II Plan, which covers the area around Pilgrim, has been sent to FEMA for technical review and work is progressing on the Commonwealth statewide plans and procedures J<sup>9</sup>

[It is noted that the statewide plans and procedures were demonstrated at full-scale exercise, at Yankee Row in April, 1988, and at Vermont Yankee in August, 1988.] 10 The progress in generating revised plans and procedures is due to the efforts of local officials, including Selectmen, town managers, civil defense directors, police chiefs, fire chiefs, public parks department of government officials, school administrators, nursing home administrators, hospital administrators, day care center administrators, harbor masters, owners of private

buildings identified for use as shelters and members of the general public working in concert with licensee employees.

As such, these individuals are thoroughly familiar with the contents of these documents and could implement these plans and procedures if necessary. [There are five procedures for two EPZ communities for Plymouth and Ducksberry that, although prepared, have not yet been approved by the local officials for forwarding to the Commonwealth for technical review.]

[11] (as already discossed.)

[Although in draft, the revised plans and procedures are in sufficiently final form that a training program, approved by the Commonwealth, is being conducted.] The NRC staff has audited this training program, including the individual lesson plans and staff from both Region I and NRR have observed the training of bus and ambulance drivers from companies providing transportation for school and daycare centers, the special needs population, and the transportation-dependent persons.

on the actual routes to be used in an emergency. The staff has audited six different training sessions and witnessed implementation of the training for approximately 50 transportation providers, which is 25 percent of that training that has already been conducted. These limited demonstrations provide the staff with the basis to conclude that significant

progress has been made in improving the emergency plans and
procedures for schools and daycare centers and for the special
needs and transportation-dependent populations in the emergency
planning zone.

[Regarding lack of a reception center for people evacuating to the north, the Commonwealth has tentatively designated a state-run facility in Wellsley as a northern reception center and has conducted a feasibility study that indicates the facility is feasible for use as a reception center. Boston Edison has performed an analysis which concludes that the two reception centers that are presently in existence at Taunton and Bridgewater, with appropriate renovations and additional equipment, have the capability to support an evacuation from the emergency planning zone, yet they are supporting the polantial for a third center.] 15

The Bridgewater State College facility is capable of serving as a location for evacuees from the emergency planning zone to assemble and lacks improvements and hardware for monitoring of radioactive material to be able to monitor the 20 percent of those arriving at the reception center within 12 hours. These modifications could be completed in a short timeframe, and by a short timeframe I mean approximately one month after approval by the Commonwealth.

The reception center at the Taunton State Hospital is an existing structure that needs modifications including

monitoring equipment that would take three to four months to
complete after approval by the Commonwealth. [The Taunton Civil
Defense Director has documented his belief that he would use
portions of the facility in an emergency, even if the
renovations were not complete and he also stated that there are
no outstanding program issues that would interfere with
implementation of workable plans and procedures.]

[Regarding a lack of identifiable beach shelters for the beach population, Boston Edison completed a shelter survey] 17 and [developed a shelter implementation program, including shelter identification, letters of agreement with the providers and shelter procedures.] 16 FEMA's position, which the NRC staff supports, is that a range of protective actions are required and that sheltering is only one protective action to be considered and is not, in and of itself, a requirement.

Therefore, FEMA has removed this issue as a concern.] 19
[Nonetheless, a shelter program for the beach population is continuing.] 20 The deficiency regarding an overall lack of progress and support in emergency preparedness is being resolved by the progress being made in correcting the other specific FEMA-identified issues, including the development of revised state plans.

I'd like to quickly summarize the information already provided for the FEMA self-initiated deficiencies and the sub-issues. The next slide.

1	[Slide.]
2	MR. BELLAMY: The next slide shows the status for
3	resolution of a school children concern and the third reception
4	center, and I have hard copies of this slide if you'd like to
5	see them.
6	CHAIRMAN ZECH: Yes. You'd better give us copies of
7	to explain it. Do you have that passed out for the audience o
8	not'
9	MR. RUSSELL: Mr. Chairman, this is an abbreviated
10	form of the materials that were available in the room when
11	people came in. It was in the memorandum that the staff has
12	forwarded to you.
13	CHAIRMAN ZECH: Well, explain it first.
14	MR. BELLAMY: This first slide shows the status for
15	resolution of the school children concern and the third
16	reception center. It is evident that the required information
17	has been included in the draft plans and procedures and that
18	approval by the Commonwealth is still required for other
19	issues.
20	by complete on this slide, I mean that if the
21	informati. 'as supposed to be included in the plans and
22	procedures, it is now in those draft plans and procedures.
23	[Slide.]
24	MR. BELLAMY: The next slide shows the status of
25	resolution for the beach sheltering issue and the concerns wi

the mobility impaired. The shelter program is engoing, even though sheltering is not specifically required. The information has, again, been provided in the eraft plans and

4 procedures.

[Slide.]

MR. BELLAMY: The next slide shows the Status for the concerns for the transportation-dependent population and the overall lack of progress. Once again, information has been included in the draft plans and procedures with, again, certain issues needing approval by the Commonwealth.

In conclusion, the NRC review of the status of emergency preparedness of Pilgrim indicates that while all tasks have not been completed, progress is being made toward resolving the issues identified by FEMA in their August 1987 report. In particular, significant progress has been made in improving the emergency plans and procedures for schools and daycare centers and for the special needs and transportation-dependent populations in the emergency planning zone.

The development of these plans and procedures, in conjunction with the training program directed toward the transportation providers responsible for evacuating school children and the special needs and transportation-dependent populations, indicates that the off-site response plans include measures to protect these groups.

The NRC staff will continue to assess the progress

being made for fully resolving the FEMA-identified issues in

off-site emergency preparedness.

1

- then, we believe there is reasons le assurance that even with
- the lack of a recent exercise adequate protective actions can
- 3 and will be taken in the event of an emergency at the Pilgrim
- 4 Plant.
- 5 Furthermore, we expect that the status of emergency
- 6 preparedness will continue to improve in the coming weeks as
- 7 Messachusetts and local officials continue to rinalize the
- plans in preparation for a full scale exercise. In summary
- 9 then, our overall conclusions with regard to Pilgrim are that
- 10 the staff believes the Pilgrim Plant is substantially safer
- 11 today than at the time of the shutdown in April of 1986.
- 12 There are more licensed operators and they are better
- 13 trained, a greater depth of management experience. There are
- 14 improved emergency operating procedures in place. There are
- improved safety attitudes among the plant workers. There are
- 16 improved conditions of plant equipment and there have been
- 17 safety enhancement improvements made. We further believe that
- 18 emergency preparedness is in better shape today than it was in
- 19 April 1986.
- 20 We believe that the Pilgrim Plant is ready to restart
- 21 and can and will be operated safely. We also believe, however,
- 22 that there must be continued progress in finalizing the
- 23 resolution of outstanding emergency preparedness issues. In
- 24 light of the extended shutdown of the plant, we will closely
- 25 observe the plant and the operating staff performance as well

- as the expected continuing progress in emergency planning to assure ourselves that our findings remain valid.
- MR. STELLO: We are through, Mr. Chairman.
- 4 CHAIRMAN ZECH: All right, thank you very much.
- 5 Questions from my fellow Commissioners? Commissioner Roberts?
- 6 COMMISSIONER ROBERTS: Two quick ones. The increased
- 7 NRC eversight, if I've got the numbers the right, an average
- B plan would be 2,500 to 3,000 up to 11,000, where is that coming
- 9 from, out of Region I or from Washington?
- 10 MR. RUSSELL: It has principally thus far come from
- 11 Region I, although we have had substantial support from NRR and
- 12 also we have had commitments from NRR to provide additional
- 13 support from both NRR and/or the other regions to support the
- 14 augmented inspection activities during power ascension.
- 15 COMMISSIONER ROBERTS: Second question. Is Pilgrim
- 16 the only Mark I BWR to affect the torus venting?
- 17 MR. RUSSELL: No, sir. There are other facilities
- 18 which 'we that capability, but not hardened. That has been in
- 19 existence since Revision 2 of the Emergency Operating
- 20 Procedures for General Electric and the change in this instance
- 21 is piping systems which are designed to handle the elevated
- 22 pressure rather than using installed duct work associated with
- 23 standby gas treatment systems, which would likely fail under
- 24 the increased pressures. Nine Mile Point 1, for example, has a
- 25 hardened vent that is similar. Peach Bottom has a venting

- capability. Some vent paths are capable of handling the higher
- 2 pressures.
- This is one that is designed specifically for that
- 4 purpose. It does inc? e a rupture disk in the design. So
- 5 even though it is a ver , it would not be used until you got to
- 6 elevated pressure so t. : there is not a potential for an
- 7 inadvertent release th sugh that path.
- 8 COMMISSIONER ROBERTS: Thank you. That's all I have.
- 9 MR. STELLO: I might add, Commissioner Roberts, that
- 10 that's the best one we've seen.
- 11 CHAIRMAN ZECH: Mr. Carr?
- 12 COMMISSIONER CARR: [Yes. I would like to ask about
- 13 the Area 2 state plan. You said it was submitted to FEMA for a
- 14 technical review. My understanding is it was just going down
- 15 there for information and comment rather than for any official
- 16 review. Is that right?
- 17 MR. BELLAMY: Sir, I think that's a term that we've
- 18 used a great deal over the last couple of months in our
- 19 discussions with both FEMA and the Commonwealth of
- 20 Massachusetts.
- 21 COMMISSIONER CARR: It wasn't down there for
- 22 approval, I guess, is what I'm told.
- MR. BELLAMY: The plans and procedures and the
- 24 Massachusetts Civil Defense Agency Area 2 plan have been
- 25 forwarded with documentation from Massachusetts Civil Defense

- Agency to FEMA for what they term a technical review. It does
- 2 not imply that the Commonwealth has approved those plans and
- 3 that caveat is in each transmittal letter. ]21
- CHAIRMAN ZECH: Commissioner Rogers.
- 5 COMMISSIONER ROGERS: Well, I've heard a number of
- 6 presentations here today, people from Massachusetts and people
- 7 from the staff and we've been asked to consider them all very
- carefully and to weigh them in making a decision. I'm trying
- 9 to sort out in my own mind whether I'm hearing the same things
- 10 from everybody.
- I heard that there are no plans for dealing with an
- 12 emergency at Pilgrim in place and that none of the local
- 13 agencies are ready to deal with any of this. I first wonder
- 14 whether Massachusetts seems to be in that happy circumstance
- 15 that it never has any natural disasters or it can anticipate no
- natural disasters and if it does face the reality of those, how
- 17 does it do it if there are no plans in place.
- 18 [I wonder, Dr. Bellamy, if you could just may a few
- 19 words to try to put into some context your views and statements
- 20 with respect to the cooperation of local officials and their
- 21 ability to deal with an emergency plan with the statements that
- 22 we heard from other folks from Massachusetts earlier before the
- 23 NRC and licensee presentations.
- MR. BELLAMY: Yes, Mr. Commissioner, I'd be glad to.
- I think the caveat that you heard earlier today a number of

1	times that there are no plans and procedures in place
2	specifically implies or specifically states that the
3	Commonwealth has not officially approved those plans and
4	procedures and sent them to FEMA with that approval and until
5	the Commonwealth gives those plants and procedures that
6	official approval, they will continue to state that there are
7	no plans and procedures in place.]22
8	I have been intimately involved in this review for
9	six years. As I've indicated, the last three years have been -
10	- a lot of time spent on Pilgrim. I have personally met with
12	sore of the local planning officials in the Plymouth area. I
12	have toured the Duxbury beaches. [I have visited the local
13	emergency operating centers and those facilities are there and
14	they are ready to be used in an emergency.]23
15	[ The people that are generating the procedures and the
16	people that have generated the plans are the specific
17	individuals, the local emergency planning officials, the select
18	men, the mayors, fire chiefs, the civil defense directors who
19	would be charged to use those plans and procedures in the event
20	of an emergency.
21	So, they are aware of the information in those
22	procedures and would be prepared to use them if necessary. ]24
23	COMMISSIONER CARR: Do they have copies of them?
24	MR. BELLAMY: The individuals who have been preparing
2.5	procedures at the administration level ves. sir. They do.

1	COMMISSIONER ROGERS: [ Just with respect to another
2	statement that was made, I quess by Senator Kennedy, Dr.
3	Murley, I wonder if you could comment on his statement that you
4	had made a commitment that emergency preparation plans
5	including a demonstration exercise of such plans would be held
6	before restart.
7	MR. MURLEY: Yes. That was what he was referring
8	to was in my testimony in Plymouth in January of this year.
9	What I said was that we would expect to see progress in
10	improving the plans and that we would expect to have to
11	observe a limited demonstration of those improvements.
12	What Dr. Rellamy described what his staff and my
13	staff have done over the last I believe month or two have been
14	in fact the demonstrations that we mentioned. The school bus
15	drivers and that sort of activity.
16	COMMISSIONER ROGERS: In other words, you feel you
17	have
18	MR. MURLEY: We did not say we never had an
19	intention that there would be an exercise or a limited
20	exercise. Of course, that can only happen once the state
21	submits plans to FEMA and that gets scheduled. We did have in
22	mind and we have completed our observation to our satisfaction
23	that the key elements necessary to implement this plan, that

is, bus drivers and routes and ambulance drivers have taken

, 0

place and we have observed that.

24

1	COMMISSIONER ROGERS: Is that in fact what you were
2	talking about when you made that statement?
3	MR. MURLEY: Absclutely, yes.] 25
4	MR. RUSSELL: Mr. Commissioner, if I could expand on
5	that because I had a meeting in Region I with various
6	representatives from the Commonwealth including the Governor's
7	office, the legislature, the Attorney General and others and I
8	described quite clearly at that meeting that there are a range
9	of ways that the staff can evaluate deficiencies. It can be
10	from a tabletop exercise. It can be from a review of the
11	plans. It can be from a limited demonstration with staff
12	members riding buses with bus drivers.
13	So, we made it quite clear in each case that the
14	standard we would use for judging is that which is necessary
15	for the staff to get the information it needs to reach its
16	conclusion. In each case, the Commonwealth has taken the
17	position that they, the Commonwealth, would only be satisfied
18	with a full-scale exercise.
19	COMMISSIONER ROGERS: I think I heard something that
20	I'd like you to repeat just once again, Dr. Murley, if you
21	could. Did I hear you say correctly, emergency procedures are
22	in better shape now than they were in 1986?
23	MR. MURLEY: That is our conclusion. Yes.
24	CHAIRMAN ZECH: Dr. Bellamy, it sounds to me like

from what you're telling us is that you've received a fair

1	amount of cooperation f	rom the state	and local officials; is	-
2	that correct?			
3	[MR. BELLAMY:	Mr. Chairman,	the cooperation that	7

have received is in the lines of making sure that I'm aware of the status of the information and the cooperation in making sure that I know exactly who has done what, what plans and procedures have been written, where they stand in the review and the fact that they are going to FEMA now for a technical review without the --

10 CHAIRMAN ZECH: But you've had a fair amount of 11 interface with the local officials.

MR. BELLAMY: Yes, sir.

13 CHAIRMAN ZECH: And they seem to be conversing with
14 you and working with you; is that correct?

MR. BELLAMY: Pretty much so. I have a number of the public that call me quite regularly, that are here today and we converse probably on a daily basis. Yes, sir.

CHAIRMAN ZECH: Do you have any difficulty as far as the local officials are concerned with a. iculating the federal responsibilities as they might be in working with the state and local responsibilities?

MR. BELLAMY: No, sir. There's been no problem in that area. We have held a number of public meetings up in that area and I have in any number of occasions been up in front of a large number of members of the public and elected officials

1	to make sure that they understand the responsibilities of the
2	federal community, the Nuclear Regulatory Commission, the
3	Commonwealth and the local officials. Some of these meetings
	have dragged on till 1:30 in the morning, sir, 126

about the training and perhaps when do you think that the training might be completed and could you talk a little bit about any other plans and procedures that should be exercised at least to the extent that you might have satisfaction that in a real emergency, the public health and safety would be protected.

Ondergoing rivem by the local planning boards of Plymouth and Duxbury. No implementing procedures for Plymouth and Duxbury.

MR. BELLAMY: Yes, sir. There are approximately 300 as a round number of required implementing procedures and as I indicated, there are five of those procedures that have yet to be sent to the Commonwealth with any type of approval from the five local officials. These procedures deal specifically with the schoolchildren and some of the special needs populations in Plymouth which is the town that the Pilgrim Station is in and in Duxbury which is also in the Emergency Planning Zone.

The -- to use the term, training is complete, I think is misleading. You will never complete the training for emergency preparedness. Emergency preparedness is a living area and you always will be training new people and you always have new people becoming involved in the process.

I would think that by the end of the year, there will

1	be the overwhelming majority of the 6,000 people trained that
2	have been specified in the Commonwealth-approved training
3	program.
	CUATRYAN SECH. How shout some of these areas that

CHAIRMAN ZECH: How about some of these areas that are difficult to evacuate in the area. Could you discuss that a little bit?

7 MR. BELLAMY: Yes, sir. I think the two specific
8 concerns that come up -- one is for the schoolchildren and I'd
9 like to comment on that first. The draft plans and
10 implementing procedures now indicate that at the alert stage of
11 a nuclear emergency, they will begin to assemble the necessary
12 transportation for evacuation of the schoolchildren and at the
13 site area emergency stage, they would implement that
14 evacuation.

That's a much necessary and needed and far-reaching improvement over what's been seen in the past whereas you could wait until that general emergency stage to actually consider that evacuation. The schoolchi? Tren will be moved out long before that stage.

[The beach population area -- I have toured that beach population -- it is required to get on and off that beach with a four-wheel drive vehicle. You could not take your car on it. So, there is some limited access. There are a fair number of permits that are issued to those four-wheel drive vehicles.

The number is in the several thousands and they have

1	made sure that the plans and procedures indicate that those
2	beaches will be closed at an early stage so that you would not
3	put more people on those beaches if there is any type of event
4	at the Pilgrim Station. 327
5	COMMISSIONER CARR: Do they overnight on those
6	beaches?
7	MR. BELLAMY: No, sir. They do not.
8	COMMISSIONER CARR: So they must clear out between
9	high tides.
10	MR. BELLAMY: [The high tide issue is for a very small
11	section of that beach and there are approximately 2,000 to
12	4,000 people at the most that would be there during a bright,
13	sunny, summer weekend.
14	COMMISSIONER CARR: No, but I mean if they can't stay
15	overnight, it's only twelve hours between low tides. They must
16	come off in 12 hours.
17	MR. BELLAMY: The low tide issue is not for every
18	tide. That is only for flood tide type conditions. So, if you
19	got the perception from some of our earlier speakers that every
20	twelve hours that beach is isolated, I think that's a
21	misconception.
22	COMMISSIONER CARR: Well, even if it is shorter than
23	that, that would be the longest if they have to clear out by
24	dark.

MR. BELLAMY: Yes, sir, and those beaches are X only

1	approximately four hours a month.] 28
2	MR. MURLEY: Mr. Chairman, there is one thing that I
3	would like to add that might help to clarify. The deficiencie
4	that were found by FEMA were planning type deficiencies, not
5	execution deficiencies. Generally, as I said, there have been
6	many exercises up there, both full and partial. I mentioned
7	that I personally observed one.
8	The authorities know how to do their job. Bus
9	drivers know how to drive buses. Ambulance drivers know how t
10	drive ambulances. The problems have been that not all the
11	places were accounted for in the plans that they had to go to
12	and so forth. That is what we have been focusing on, to make
13	sure that those plans are in draft form have been updated.
14	CHAIRMAN ZECH: All right. To
15	A VOICE: Mr. Chairman.
16	CHAIRMAN ZECH: Dr. Bellamy.
17	A VOICE: Mr. Chairman.
18	CHAIRMAN ZECH: Dr. Bellamy.
19	A VOICE: I wish to challenge that this presentation
20	has been made, and it's full of half-truths. I'm not going to
21	stand here and listen to this, Mr. Chairman.
22	CHAIRMAN ZECH: You don't have to stand here.
23	Dr. Bellamy, you have told us that you believe they
24	have made considerable progress and there has been a fair

amount of interface, at least I would consider a lot of good

- working relationship between you and the people that are doing the job in that area; is that correct?
- 3 MR. BELLAMY: Yes, sir; it is.

CHAIRMAN ZECH: On the other hand, how long would it take you do you think or how much time would we need to make the progress that perhaps would be necessary for a little more confidence that all of the emergency planning procedures could be satisfied and in your interfaces, can you give us any estimate of how long it would be before the state, for example, would be satisfied that their procedures are in place to the point where they could submit them to FEMA and we would have what I would term a closure on this? Can you give any estimate at all? 

MR. STELLO: Mr. Chairman, we talked about the issue of the amount of time, the schedule it will take to complete it. In my opening comments I said we talked about whether we could make that estimate. We can't. We don't have that schedule. Dr. Murley has indicated that once the plans have been submitted to FEMA, our estimate, with no extra effort, in order to get the plans reviewed, the exercise planned for and conducted, would be about six months. How long it will be before the Commonwealth will submit the plans, Dr. Murley has indicated in our conversations when I have asked the question that he has been unable to get that schedule. We will continue to try to get it. The candid answers, we don't know.

1	COMMISSIONER CARR: Six months after submission of
2	the plans by the state before the exercise could be scheduled?
3	MR. STELLO: Without doing anything unusual. I think
4	if we tried, we could do better.
5	COMMISSIONER CARR: Normal.
6	MR. RUSSELL: I might point out, Mr. Chairman, that
7	issue has been requested several times in correspondence from
8	FEMA to the Commonwealth requesting the schedule and the
9	Commonwealth has not responded to that. We specifically
10	requested that of the Commonwealth on the October 5th meeting
11	ard they would not give us a schedule at that time as to when
12	they would be willing to commit to submitting plans.
13	CHAIRMAN ZECH: Are you telling us, is it the staff's
14	conclusion that in your considered opinion that the Pilgrim
15	plant is ready to re-start in view of what we have heard
16	regarding emergency planning and all other issues?
17	MR. STELLO: Yes, sir.
18	CHAIRMAN ZECH: Any other comments from my fellow
19	Commissioners?
20	[No response.]
21	CHAIRMAN ZECH: Let me just say first that I would
22	like to thank the Boston Edison Company for their participation
23	here today and for their addressing these issues over the past
24	months and years. It looks like progress has been made,

significant efforts have gone into it, management efforts as

- well as equipment improvements. I'd also like to commend the
  staff for their very close and extensive work in this area on
- 3 the Pilgrim plant. I know an awful lot of effort has gone into
- 4 it, in Region I as well as Headquarters.

- I believe that the earlier presentations we heard
  today are important for us to consider, too. Certainly it
  would appear from what we have heard I believe that protection
  of the public health and safety at the Pilgrim plant has been
  substantially enhanced by the corrective actions that have been
  taken since the plant was shut down.
  - I'd also like to commend the continuing efforts of the state and local officials for their work especially in the area of emergency plans for the Pilgrim facility. The states' ability to participate in and execute emergency planning responsibilities has been demonstrated repeatedly at various nuclear facilities within and bordering the State of Massachusetts.
    - I would encourage continued efforts of the state and local governments in order to complete the work on the proposed improvements to the Massachusetts' portion of the grogger emergency plans.
  - I would like to thank Senator Kennedy, Senator Kerry
    for his efforts to be here today also, Lieutenant Governor
    Murphy for coming to appear before us today as well as
    Representative Studds.

1	Frankly, from what I've heard today and given the
2	information we have heard, I would propose to my fellow
3	Commissioners that we not make a re-start vote today but I
4	would ask my fellow Commissioners to carefully consider all
5	that has been said towards reaching a conclusion considering
6	re-start of the Pilgrim facility. I hope we can come to a
7	timely conclusion.

On the other hand, I do believe we need time to reflect on what we have heard today and perhaps a little more time to make more progress to enhance what we have done already towards emergency planning.

The Commission does indeed have to have the confidence that emergency plans could be executed if necessary.

I'd ask my fellow Commissioners if they would agree with me that we not hold a vote today. Any opposed to that?

[Commissioners nodding in agreement.]

CHAIRMAN ZECH: I see none opposed. The decision is that we not have a re-start vote today. I would ask Boston Edison, the state and local officials with the involvement of the NRC staff and FEMA as necessary, I would encourage you and commend you to continue working together on this emergency planning issue at the Pilgrim site so that the Commission can be confident that we will be making a proper decision. You had time to reflect on this. That is the decision of the Commission today. I would ask those who are involved in this

1	very important matter to continue their efforts and in the
2	meantime the Commission will reflect on this issue and we will
3	expect to be hearing from the staff as progress continues in
4	the future.
5	Anything else to come before us?
6	[No response.]
7	CHAIRMAN ZECH: If not, we stand adjourned. Thank
8	you very much.
9	[Whereupon, the meeting was adjourned.]
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#### CERTIFICATE OF TRANSCRIBER

This is to certify that the attached events of a meeting of the U.S. Nuclear Regulatory Commission entitled:

TITLE OF MEETING: DISCUSSION/POSSIBLE VOTE ON PILGRIM RESTART
PLACE OF MEETING: Washington, D.C.

DATE OF MEETING: FRIDAY, OCTOBER 14, 1988

Were transcribed by me. I further certify that said

transcription is accurate and complete, to the best

of my ability, and that the transcript is a true and
accurate record of the foregoing events.

John Fransidge

Ann Riley & Associates, Ltd.

References in Support of Statements Made During the October 14, 1988 Commission Meeting (Copies of references are attached)

- Transcript (hereinafter Tr.) at 79, Line (hereinafter 11) 19-21.
   Memorandum to Frank J. Congel, Director, Division of Radiation Protection and Emergency Preparedness, NRC, from Richard W. Krimm, Assistant Associate Director, Office of Natural and Technological Hazards Programs, dated August 6, 1987, Subject: Offsite Emergency Planning at Pilgrim, Attachment at 2-8.
- 2. Tr. at 79, 11 23-25 and Tr. at 80, 11 1-5. Id at 1.
- Tr. at 80, 11 6-7. Letter to Ralph G. Bird, Senior Vice President -Nuclear, Boston Edison, from Steven A. Varga, Director, Division of Reactor Projects, NRC, dated August 18, 1987, Subject: FEMA Report on Offsite Emergency Planning for Pilgrim.
- 4. Tr. at 80, 11 7-8. Letter to NRC from Ralph G. Bird, Senior Vice President - Nuclear, Boston Edison, dated September 17, 1987, Subject: Schedule for Providing Assistance in Addressing FEMA Issues.
- 5. Tr. at 80, 11 8-12. Richard W. Krimm, Supra at 1.
- Tr. at 80, 11 13-15. Id. at 1, Attachment at 2-8.
- 7. Tr. at 80, 11 16-20. Memorandum to James M. Taylor, Deputy Executive Director for Regional Operations, NRC, from William T. Russell, Regional Administrator. Region I, dated October 19, 1988, Subject: Pilgrim Nuclear Power Station: Emergency Preparedness Public Comments; and Memorandum to William J. Lazarus, Chief, Emergency Preparedness Section, Region I, from Craig J. Conklin, Senior Emergency Preparedness Specialist, Region I, dated November 1, 1988, Subject: Pilgrim Nuclear Power Station Meetings Regarding Emergency Preparedness.
- 8. Tr. at 80, 11 20-23. Id.
- 9. Tr. at 80, 11 24-25 and 81, 11 1-16. Numerous letters to Massachusetts Civil Defense Agency from EPZ towns forwarding planning documents including:
  Town of Duxbury, dated March 9, 1988, Subject: Emergency Plan review;
  Town of Carver, dated January 12, 1988, Subject: Emergency Plan review;
  Town of Plymouth, dated January 8, 1988, Subject: Emergency Plan review;
  City of launton, dated January 4, 1988, Subject: Emergency Plan review;
  Town of Kingston, dated December 30, 1987, Subject: Emergency Plan review;
  review;

Town of Marshfield, dated August 12, 1988, Subject: Emergency Plan, Implementing Procedures, Shelter Implementation Program Summary, and Cross Reference Table review; City of Taunton, dated August 15, 1988, Subject: Emergency Plan, Implementing Procedures and Cross Reference Table for review; Town of Bridgewater, dated September 21, 1988, Subject: Emergency Plan, Implementing Procedures, Corrective Action Response, and Cross Reference Table for review: Town of Kingston, dated October 5, 1988, Subject: Emergency Plan, Implementing Procedures, Corrective Action Response, and Cross Reference Table for review; and Town of Carver, dated October 4, 1988, Subject: Emergency Plan. Implementing Procedures, Sheltering Implementation Program and Cross Reference Table for review. Letters to FEMA Region 1 from Massachusetts Civil Defense Agency (MCDA) forwarding planning documents including: MCDA to FEMA Region I, dated February 4, 1988, Subject: Emergency Plan for the towns of Plymouth, Carver, Kingston and the city of Taunton for review: MCDA to FEMA Region I, dated September 6, 1988, Subject: Emergency Plan, Implementing Procedures, Shelter Implementation Program and Cross Reference Table for the Town of Marshfield and Emergency Plan, Implementation Procedures and Cross Reference Table for the City of Taunton for review: MCDA to FEMA Region I, dated September 23, 1988, Subject: Area II Emergency Plan for review; and MCDA to FEMA Region I, dated September 30, 1988, Subject: Emergency Plan, Implementing Procedures and Cross Reference Table for review.

- 10. Tr. at 81, 11 17-19. NRC Inspection Report 50-29/88-08, Yankee Atomic Power Company, dated June 7, 1988; and NRC Inspection Report 50-271/88-13, Vermont Yankee Nuclear Power Corporation, dated October 6, 1988. Although FEMA reports on these two exercises have not yet been issued, the NRC, by its participation in the Regional Assi unce Committee (RAC) process, was aware at the time of the October 14, 11 8 Commission Meeting that deficiencies identified in the statewice plan had been corrected.
- 11. Tr. at 82, 11 5-9. Letter to NRC from Ralph G. Bird, Schior Vice President-Nuclear, Boston Edison, dated October 7, 1988 Schject: 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". Attachment at 49 and 58.
- 12. Tr. at 79, 11 10-12. Letter from Michael S. Dukakis, Governor Commor.wealth of Massac. setts, to Lando Zech, Chairman, NRC, dated October 11, 1988, Subject: F. rwarding of "A Report on Progress Made in Emergency Planning for Response to an Accident at Pilgrim Nuclear Power Station", Attachment at 38 and 39.

- 13. Tr. at 82, 11 12-24. Memorandum to William Russell, Regional Administrator, Pegion I, from William Lazarus, Chief Emergency Preparedness Section, Region I, dated September 9, 1988, Subject: Status of Offsite Emergency Preparedness at Pilgrim; and Memo to William Lazarus, Chief Emergency Preparedness Section, Region I from Craig Conklin, Senior Emergency Preparedness Specialist, Region I, dated October 20, 1988, Subject: Hands On Training for Transportation Providers for the Pilgrim EPZ.
- 14. Tr. at 83, 11 5-10. Dukakis, Supra at Attachment 32; and Letter to Charles V. Barry, Secretary, Executive Office of Public Safety, Commonwealth of Massachusetts, from John L. Lovering, Deputy Director, Massachusetts Civil Defense Agency and Office of Emergency Preparedness, dated October 11, 1988, Subject: Feasibility Study Involving the Suitability of the State Department of Public Works Garage located in Wellesley, Ma. as a Potential Reception/Processing Center for Evacuaes in the Event of an Accident at the Pilgrim Nuclear Power Station, Plymouth, MA, at Attachment at 2-8.
- 15. Tr. at 83, 11 10-15. Letter to Peter Agnes, Jr., Assistant Secretary of Public Safety, Commonwealth of Massachusetts from Ronald A. Varley, Staff Assistant to Senior Vice President - Nuclear, dated December 23, 1987, Subject: Reception Center Feasibility Analysis, At Attachment at 1-3.
- 16. Tr. at 84, 11 2-7. Letter to Peter Agnes, Jr., Assistant Secretary of Public Safety, Commonwealth of Massachusetts from Robert C. Spearin, Director, Department of Civil Defense, City of Taunton, dated October 5, 1988, Subject: comments on the draft "A Report on Progress Made in Emergency Planning for Response to an Accident at Pilgrim Nuclear Power Station".
- 17. Tr. at 84, 11 8-9. Letter to Peter Agnes, Jr., Assistant Secretary of Public Safety, Commonwealth of Massachusetts from Ralph G. Bird, Senior Vice President Nuclear, dated October 26, 1987, Subject: Pilgrim EPZ Public Beach Population Analysis; Letter to Peter Agnes, Jr., Assistant Secretary of Public Safety, Commonwealth of Massachusetts from Ralph G. Bird, Senior Vice President Nuclear, dated June 30, 1987, Subject: information to resolve concerns in FEMA Self-Initiated Review; Letter to Edward A. Thomas, Chairman Regional Assistance Committee, FEMA Region I from Ronald R. Bellamy, Chief Emergency Preparedness and Radiological Protection Branch, Region I, dated June 12, 1987, Subject: "Evacuation Time Estimate and Beach Population Sheltering", "Mobility Impaired", and "Special Facilities", and Pilgrim Station Evacuation Time Estimates and Traffic Management Plan Update, dated August 25, 1988.
- 18. Tr. at 84, 11 10-12 Marshfield Shelter Implementation Program, submitted for review August 12, 1988. Dukakis, <u>Supra</u> at Attachment at 61-64. The Marshfield program is representative of programs for each of the other EPZ communities that the staff was aware were in various stages of preparation at the time of the October 14, 1988 Commission Meeting.

- 19. Tr. at 84, 11 12-16 Letter to to Charles V. Barry, Secretary, Executive Office of Public Safety, Commonwealth of Massachusetts, from Henry G. Vickers, Regional Director, FEMA, Region I, dated August 22, 1988, Subject: Response to Commonwealth concerns on Emergency Preparedness issues.
- 20. Tr. at 84, 11 17-18. Supra at Item 18.
- 21. Tr. at 90, 11 12-25 and Tr. at 91, 11 1-3. Among the numerous letters referenced in Item 9, See letter from Robert J. Boulay, Director, Civil Defense Agency and Office of Emergency Preparedness, Commonwealth of Massachusetts, to Edward A. Thomas, Chairman Regional Assistance Committee, FEMA. Region I, dated September 23, 1988.
- 22. Tr. at 91, 11 18-25 and Tr. at 92, 11 1-7 Numerous letters previously cited in Item 9.
- 23. Tr. at 92, 11 12-14. This statement referred to a specific visit made to the Duxbury EOC on October 6, 1988 (see Enclosure 2, Attachment 4), and was not meant to imply all the EOCs had been toured prior to October 14, 1988. Since that time, the staff has toured each of the seven local EOCs for the Pilgrim Station (see Enclosure 3).
- 24. Tr. at 92, 11 15-22. Dukakis, Supra at Attachment at 11.
- 25. Tr. at 93, 11 1-25 and Tr. at 94, 11 1-3. Testimony Before the Senate Labor and Human Resources Committee Regarding The Pilgrim Nuclear Power Station, by Dr. Thomas Murley, Director, Office of Nuclear Reactor Regulation, NPC, dated January 7, 1988, at page 8 of prepared statement.
- 26. Tr. at 95, 11 3-25 and Tr. at 96, 11 1-4. Prior to the October 14, 1988 meeting, the staff had interacted primarily with the Commonwealth on technical issues related to emergency planning. The staff was aware of Incal officials' concerns regarding emergency preparedness through attendance at the meeting held by the staff and others at which emergency preparedness issues were raised (see enclosure 2). After the October 14, 1988 meeting, the staff met with all seven Civil Defense Directors, two Selectmen and others (see enclosure 3).
- 27. Tr. at 97, 11 20-25 and Tr. at 98, 11 1-8. See information provided in Items 7, 9 and 17.
- 28. Tr. at 98, 11 10-25 and Tr. at 99, 11 1. See information provided in 17 and 11. Letter to Ronald Bellamy, NRC from Mary C. Ott and Donald M. Muirhead Jr., M.D., Co-Chairmen, Citizens Urging Responsible Energy, dated September 30, 1988, Subject: Report on the Problems of Evacuation and Sheltering of Beach/Transient Populations Due to the Proximity of Pilgrim I Station.



## NUCLEAR REGULATORY COMMISSION

October 27, 1988

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

Dear Mr. Agnes:

In response to your request of October 17. 1988. I am enclosing a copy of the transcript of the October 14, 1988 Commission meeting on the Pilgrim Nuclear Power Station. The NRC staff has identified statements made at the meeting that they believe may need clarification. A copy of their suggested clarification is also enclosed.

Sincerely,

Lando W. Zeeh, Jr.

Enclosures:

(a) Commission Feeting Transcript
 (b) Staff Proposed Clarifications.

cc: The Honorable Evelyn Murphy

Originated: NRR:Wessman

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### Federal Emergency Management Agency

Washington, D.C. 20472

AUG 6 1987

MEMORANDUM FOR:

Frank J. Congel, Director

Division of Radiation Protection and Emergency Preparedness

Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Funded W. Commission

FROM:

Assistant Associate Director

Office of Natural and Technological

Hazards Programs

SUBJECT:

Offsite Emergency Planning at Pilgrim

In my memorandum to you on July 13, 1987, I stated the Foderal Emergency Maragement Agency (TEMA) would deliver to the Nuclear Mogulatory Commission (NAC) a finding on the adequacy of the offsite emergency preparedness plans for the Pilgrim Nuclear Power Station on or about August 15, 1987. This is an update of our previous interim finding which was transmitted to the NRC on November 2, 1983, along with a copy of the exercise report evaluating the initial joint State and local offsite radiological emergency preparedness exercise. These reports were provided to the NRC pursuant to the NRC/FEMA Memorandum of Understanding of November 1980, and in response to the NRC's request for assistance concerning emergency preparedness issues at Pilgrim dated Septency 6, 1983. In addition, in a memorandum to NRC on March 31, 1987, FEMA indicated that the response to the Latted 2,206 petition would be consolidated with the results of FEMA's self-initiated review of the overall state of offsite emergency preparedness and other relevant information.

FDMA's report, entitled "Self-Initiated Review and Interim Finding for the Pilgrin Nuclear Power Station" dated August 4, 1987, is attached. Included as attachments to the report are "FDMA Comments on the Report to the Governor on Emergency Preparedness for an Accident at the Pilgrim Nuclear Power Station" dated July 29, 1987 (located at Tab 1 in the attached binder), and FDMA's "Analysis of Emergency Preparedness Isques at Pilgrim Nuclear Power Station Raised in a Petition to the NRC dated July 15, 1986". FDMA's analysis of the issues raised in the 2.206 putition is cated July 29, 1987, and is located at Tab 2 of the attached binder.

Based on the Self-Imitiated Review and Interim Finding, FB., as concluded that Massachusetts offsite radiological emergency planning and imparedness are inadequate to project the public health and safety in the event of an accident at the Pilgrim Nuclear Power Station. Because of the changed circumstances discussed in the report, the finding of adequacy contained in FEMA's previous interim finding no longer applies and that interim finding is hereby superseded.

CONTRACTOR SERVICE

If you have any questions, please contact he #1,646-2871.

Attachments As Stated

#### I. SUMMARY

On September 5, 1986, the Federal Emergency Management Agency (FEMA) informed the Commonwealth of Massachusetts that it was undertaking a review of its September 29, 1982 Interim Finding for the Pilgrim Nuclear Power Station because of concerns raised during meetings in the Spring of 1986 and information received subsequent to those meetings from local officials, the Commonwealth, and other interested parties. FEMA identified six issues during the course of that review:

- Lack of evacuation plans for public and private schools and daycare centers.
- Lack of a reception center for people evacuating to the north.
- Lack of identifiable public shelters for the beach population.
- Inadequate planning for the evacuation of the special needs population.
- Inadequate planning for the evacuation of the transport dependent population.
- Overall lack of progress in planning and apparent diminution in emergency preparedness.

FEMA has analyzed these issues pertaining to the radiological emergency response plan and has reviewed the plan and exercise reports in conformance with applicable standards.

FEMA concludes that the plan and preparedness for the state

and local governments within the plume exposure pathway for the Pilgrim Nuclear Power Station are not adequate to protect the health and safety of the public in the event of an accident at the Pilgrim Nuclear Power Station. This Interim Finding supercedes the Interim Finding of September 29, 1982.

#### II. BACKGROUND

On June 16, 1981, the Director of the Massachusetts Civil Defense Agency and Office of Emergency Preparedness (MCDA) submitted to the Federal Emergency Management Agency (FEMA), on behalf of the Governor, the State Comprehensive Emergency Response Plan, together with its Annexes, for Massachusetts and the local communities within the Plume Exposure Emergency Planning Zone (EPZ) for the Pilgrim Nuclear Power Station located in Plymouth, Massachusetts. In his letter of transmittal which accompanied this plan he stated, as required by Federal Regulation (See, 44 CFR 350.7), that "this plan is, in the opinion of the Massachusetts Civil Defense Agency, adequate to protect the public health and safety of the Commonwealth's citizens within the designated emergency planning zones of the Pilgrim Station and provides

for appropriate protective measures to be taken by the State and local governments in the event of a radiological emergency at the Pilgrim Station".

FEMA and the Regional Assistance Committee (RAC) reviewed this plan and issued a report of its review in October, 1981. As a consequence of this report the Commonwealth revised the plan. FEMA and the RAC reviewed this revision and issued a second report containing an analysis of areas where the plan was weak in September, 1982. FEMA has received no response from the Commonwealth regarding further revision of its plan.

In the interim, FEMA sponsored a public meeting, held on June 3, 1982, to discuss the Commonwealth's Radiological Emergency Response Plan for the Pilgrim Nuclear Power Station. The following issues were raised by the public at the meeting:

- The ability to evacuate communities within the 10-mile EPZ.
- The ability to evacuate Cape Cod beyond the 10-mile EP2.
- Reliability and effectiveness of the sirens.
- Training and education of teachers, school bus drivers, and hospital personnel.
- Information brochures for the public, including transients.

- Policy on the use of radioprotective drugs.
- Protection of the elderly and others with special needs.

The Commonwealth responded to all these concerns, stating that the plan "provide(s) adequately for safe and orderly evacuation of communities within the 10-mile EPZ" and pledging to work toward further improvement of the plan.

FEMA then issued an Interim Finding for the Pilgrim Nuclear Power Station on September 29, 1982. It found that although there were problems with the plan, "the state plan and local plans together are adequate to protect the health and safety of the public."

Exercises testing this plan were conducted on March 3, 1982, June 29, 1983, and September 5, 1985; a Remedial Exercise was conducted on October 29, 1985; and FEMA observed a Drill on August 15, 1984. "Deficiencies", "areas requiring corrective action", and "areas recommended for improvement"

Follow-up to the June 3, 1982 Public Meeting, FEMA, p. 1

<sup>\*</sup> Ibid., p. 1

Interim Findings Joint State and Local Radiological Emergency Response Capabilities for the Pilgrim Nuclear Power Station Plymouth, Massachusetts, FEMA, September 29, 1982, p. 5.

were identified. As FEMA now uses the term, "deficiencies" are problems identified in plan implementation which preclude a finding that a plan is adequate to protect the health and safety of the public. "Areas requiring corrective action" are defined as inadequacies in State and local government performance observed during an exercise; although their correction is required, they are not considered, by themselves, to so adversely impact public health and safety, as to preclude a finding that the plans and preparedness are adequate to protect public health and safety. "Areas recommended for improvement" are defined as problem areas observed during an exercise that are not considered to adversely impact public health and safety. No deficiencies remain outstanding from FEMA's evaluation of these exercises. Many "areas requiring corrective action" and "areas recommended for improvement", however, have not been addressed to date.

By March, 1985, status of off-site radiological emergency response planning for the Pilgrim Nuclear Power Station was: (1) many planning problems remained unresolved from the October, 1981 RAC Review; (2) the Commonwealth had not responded to the September, 1982 RAC Review; and (3) it had not provided FEMA with schedules of corrective actions for the problems identified in the 1982 and 1983

exercises, which (as required by FEMA guidance) had been due within 30 days following the issuance of the exercise reports. On March 6, 1985 FEMA, therefore, informed the Commonwealth by letter that, because of unresolved emergency planning issues, it was suspending processing of the Massachusetts request for formal emergency plan approval made pursuant to 44 CFR 350. On June 20, 1985 the Commonwealth sent FEMA a schedule, both of actions it had taken and specific measures it was planning to take, to correct the problems identified in the 1983 exercise; plus general steps taken to correct problems identified in the 1982 exercise. However, the plan improvements the State promised have not yet been delivered to FEMA.

In its evaluation of the September 5, 1985 Pilgrim exercise FEMA found that many of the previously identified problems had been corrected, but it identified new problems and four "deficiencies". The Commonwealth corrected the "deficiencies", as evidenced in an October 29, 1985 Remedial Exercise. It has not yet, however, provided FEMA a schedule of corrective actions for the 1985 exercise. FEMA guidance requires the submittal of a schedule of corrective actions within 30 days of the issuance of the exercise report.

On October 30. 1985. FEMA again informed the Commonwealth by letter that the processing of the " 350" request was not progressing because of the many, unresolved issues identified in the 1981 and 1982 RAC Review, and observed during the exercises. FEMA also requested copies of the 1985 version of the local plans, which were provided in June 1986. The Commonwealth replied to FEMA's letter on June 6, 1986, at which time it outlined the initiatives it was taking in order to resolve the outstanding issues, and indicated the areas in which improvements had been made in the state plan and procedures. This reply did not, however, constitute a schedule of corrective actions because it did not provide a date by which plan improvements were to be completed. In sum, the Self-Initiated Review was based on the 1982 Massachusetts Radiological Emergency Response Plan and the 1985 version of the local plans.

FEMA first became aware of potentially serious problems with the Commonwealth's plan during a series of meetings with the Commonwealth and local communities in the Spring of 1986. Issues raised at these meetings, and information received subsequently, indicated that FEMA should review its Interim Finding concerning the emergency response plan for the Pilgrim Nuclear Power Station. Based on the information it

received. FENA decided to conduct a review of the emergency response plan and preparedness for the Pilgrim Nuclear Power Station and so informed the Commonwealth in a letter to MCDA on September 5, 1986.

On December 22, 1986, the Secretary of Public Safety, Charles Barry, forwarded to FEMA a copy of the "Report to the Governor on Emergency Preparedness for an Accident at the Pilgrim Nuclear Power Station" (hereinafter called the Barry Report). This report stated that the Massachusetts plan and its preparedness are inadequate to protect the health and safety of the public in the event of an accident at the Pilgrim Nuclear Power Station. FEMA was subsequently informed that the Governor and the Director of the Massachusetts Civil Defense Agency had endorsed the Barry Report. In the course of its self-initiated review, FEMA has treated this report as the authoritative and current position of the Commonwealth.

Letter from Charles Barry, Secretary of Public Safety to Edward A. Thomas, December 22, 1986.

Letter from Robert J. Boulay, Director MCDA, to Edward A Thomas, April 10, 1987.

P02

NO. 883

Billing



# NUCLEAR RESULATORY COMMISSION

August 18, 1987

Docket No. 50-293

Mr. Ralph 6. Bird Senior Vice President-Nuclear 800 Boylston Street Boston, Massachusetts 02199

SURJECT: FEMA REPORT ON OFFSITE EMERGENCY PLANNING FOR PILGRIM

Dear Mr. Bird:

Enclosed is the Federal Emergency Management Agency (FEMA) report titled. Self-Initiated Review and Interim Finding for the Pilgrim Nuclear Power memorandum dated August 6, 1987. Based on a review of the overall state of Massachusetts offsite radiological emergency planning and preparedness are inadequate to protect the public health and safety in the event of an accident previous interim finding of adequacy regarding offsite emergency preparedness for Pilgrim.

FEMA has identified six issues during the course of its review:

- Lack of evacuation plans for public and private schools and daycare centers.
- 2. Lack of a reception center for people evacuating to the north.
- 3. Lack of identifiable public shelters for the beach population.
- 4. Inadequate planning for the evacuation of the special needs population.
- Inadequate planning for the evacuation of the transportation dependent population.
- Overall lack of progress in planning and apparent diminution in emergency preparedness.

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The FEMA report also addressed the seven alleged deficiencies in emergency planning identified in William P. Golden's July 15, 1986 Petition to the NRC. FEMA found that while these areas of plan weakness were not sufficient to sustain the contentions raised in the Petition, resolution of these weaknesses would enhance the State's ability to protect the public.

We view the emergency planning issues identified by FEMA to be a matter of serious concern. The determination to restart the Pilgrim plant will involve. In part, consideration of the FEMA identified emergency planning issues. We are aware that you are providing assistance and information to the Commonwealth of Massachusetts pertaining to several of these issues. We requent that you local governments in addressing the FEMA identified emergency planning issues for Pilgrim.

Please contact the Project Manager if you have questions.

Sincerely,

Division of Reactor rojects - 1/11 Office of Nuclear Reactor Regulation

As stated

#

Execution Offices
800 Boyfston Street
Boston, Massachusetts 02199

Ralph G. Bird Senior Vice President — Nuclear

> September 17, 1987 BECo Ltr.#87-148

U.S. Nuclear Regulatory Commission Document Control Desk Hashington, D.C. 20555

> Docket 50-293 License No. DPR-35

SUBJECT:

Boston Edison Company Action Plan and Schedule for Providing Assistance in Addressing EMA Issues

Dear Sir:

As requested by Mr. Varga's letter of August 18, 1987, transmitting a copy of the FEMA report entitled "Self Initiated Review and Interim Finding of the Pilgrim Nuclear Power Station", we are enclosing an action plan and schedule for assisting the Commonwealth of Massachusetts and local governments in addressing the FEMA identified emergency planning issues for Pilgrim Nuclear Power Station. The Commonwealth has reviewed and concurs with our assessments as presented in the action plan and schedule.

The enclosed action plan and schedule identifies various "subissues" derived from the FEMA report and sets forth the current status, the planned assistance to be provided by Boston Edison to the Commonwealth and local governments, the target schedules for resolution, and as necessary, an explanatory comment. As explained more fully in the introduction, the action plan and schedule is part of a comprehensive program of assistance by Boston Edison to the Commonwealth and local governments in upgrading the offsite emergency response programs relating to the Pilgrim Nuclear Power Station.

U. S. Nuclear Regulatory Commission Page 2

Please do not hesitate to contact either myself or Mr. Ron Varley at (617) 747-8544 if any additional information is required.

Raiph 6. Bird

RGB/dlw Enclosure

cc: Mr. Steven A. Varga, Director Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Mr. R. H. Wessman, Project Manager Division of Reactor Projects - I/II Office of Nuclear Reactor Regulation U. S. Nuclear Regulatory Commission 7920 Norfolk Avenue Bethesda, MD 20814

Mr. Richard Krimm, Assistant Associate Director FEMA 500 C Street - Federal Plaza Washington, D.C. 20472

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