

Advanced Medical Systems, Inc.

1020 London Road
Cleveland, Ohio 44110
(216) 692-3270
Fax (216) 692-3269

PUBLIC/PDR

030-16055

October 24, 1997

Robert M. Derrit, Acting Chief
Division of Fire
1645 Superior Avenue
Cleveland, Ohio 44114-2984

34-19087-01

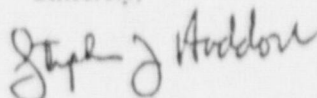
Re: Emergency Response Drill for the Advanced Medical Systems Facility

Dear Chief Derrit:

Advanced Medical Systems, Inc. (AMS) is in receipt of your letter dated October 6, 1997 wherein comments on "January 28, 1988 Emergency Response Exercise Plan" were given. Thank you for taking the time to review the plan and provide us with your input.

As follow-up to that letter, and as agreed upon in a October 21, 1997 conference call between Captain Mark Scott and representatives of AMS, attached are our responses to your comments, along with a description of our proposed follow-up actions. Please call me at (216) 692-3270 if I can assist you further on this or related matters. AMS is looking forward to a mutually-beneficial emergency response experience. We appreciate the time and assistance given to date by you and your staff.

Sincerely,



Stephen J. Haddock, R.S.O.

cc: E. Svigel
T. Stavole, Esq. - Stavole & Miller
H. Billingsley, Esq. - Arter & Hadden
C. Berger, C.H.P. - IEM
M. Weber - USNRC (Region III) ✓
M. J. Scott, Cpt. - Division of Fire
J. M. Dodrill, Esq. - City of Cleveland

RECEIVED

NOV 14 1997

REGION III

9712010065 971024
PDR ADOCK 03016055
C PDR

010002



Pm 10-28-97

NOV 14 1997

mil
3! DH

**RESPONSE TO OCTOBER 6, 1997 COMMENTS ON THE
AMS EMERGENCY RESPONSE EXERCISE PLAN**

Comment A.1: AMS and the Division of Fire should meet well in advance of the planned exercise drill . . . etc.

AMS Response: AMS concurs with this recommendation. The AMS Radiation Safety Officer (RSO) will host a pre-drill meeting at the London Road facility for all interested "first responders". Captain Scott has agreed to coordinate the responders using a call list provided by the RSO.

Comment A.2: The Division of Fire has adopted the Incident Command System (ICS) as a management system at all emergency incidents. The ICS is . . . etc.

AMS Response: AMS acknowledges the Division of Fire's management system.

Comment A.3: Due to current shift schedules and consideration with regard to potential overtime costs, the Division of Fire cannot participate between the hours of 6:30 a.m. . . . etc.

AMS Response: The drill activities will begin at approximately 11:00 a.m. on January 28, 1997 in order to accommodate this request.

Comment A.4: According to the *Ohio Revised Code (ORC) Section 3737.80 and the Ohio Administrative Code (OAC) Chapter 1301:7-1-03 Section (I) FM-102.7*, the Fire Chief or his authorized representative shall be in charge at the scene of a fire or other emergencies involving protection of life and/or property. The Fire Chief's authority . . . etc.

AMS Response: AMS acknowledges the Division of Fire's management system and authority.

Page 2, Line 6: Will emergency responders be staged or will they respond from their respective quarters?

AMS Response: The decision to stage responders in advance of the start of the drill is left to the discretion of the responding agency. AMS will follow the notification scheme in the "Emergency Plan for the London Road Facility" (Emergency Plan) during the emergency unless temporary alternative telephone numbers are provided in advance.

Page 2, Line 20: Add: "...operations or security, or the safety of the participants".

AMS Response: Concur. Page 2, Line 20 will be modified to read: "Develop a scenario that does not jeopardize AMS facility operations or security and general and personal safety of all participants."

Page 2, Line 23 and remaining document: - Change "Emergency Response Manager" to Incident Commander.

AMS Response: The Emergency Response Manager is the individual, designated in the Emergency Plan, with responsibility for radiation safety during emergencies. It is this individual's actions that will be evaluated during the drill. Because the drill is intended to test the November 5, 1996 version of the Emergency Plan, no organizational or title changes are permitted. However, if the critique of the drill identifies organizational difficulties, changes to the Plan will be made at that time.

Page 3, Line 5: In an actual hazardous material emergency, all patients would be decontaminated prior to transport. Does AMS want the Emergency Medical Service actually to transport victims to the hospital?

AMS Response: The Emergency Medical Service may, at its own discretion, elect to transport a critically-injured but contaminated victim to the hospital. However, this agency is not obliged to carry the drill to this extent.

Page 4, Line 5: The Emergency Response Organization flow chart, referred to in Figure 1, is recognized by the Division of Fire as being an AMS document only. The ICS is used by the Cleveland Fire Department and as described in Item #3 above, the Fire Chief or his representative is in charge at the scene of any fire or other emergency involving the protection of life and/or property.

AMS Response: AMS acknowledges the Division of Fire's management system and authority. The organization shown in Figure 1 is exactly as described in the Emergency Plan. However, AMS recognizes that organizational descriptions may be necessary after the critique of the drill. If so, changes to the Emergency Plan will be made at that time.

Page 5, Line 13: 10 CFR, Section 40.31(xii) Exercises. - "Exercises must use accident scenarios postulated as most probable for the specific site..."

AMS Response: The most probable accident at the AMS facility is an intruder, which requires assistance only from the Police Department and the AMS security service. However, it is AMS' desire to test as much of the emergency response organization shown in the Emergency Plan as possible during the drill. Therefore, a highly-contrived sequence of events was selected so that a variety of site conditions would result. This is the reason for the statement on Page 5, Line 13.

Page 7, Line 5: A specific alarm signal and method of communication should be developed in case of a real emergency.

AMS Response: Page 7 of the Exercise Plan describes the means by which the exercise will be terminated in deference to an actual on- or off-site emergency. AMS would be pleased to discuss the details of this method further during a pre-drill meeting with interested first responders (see response to Comment A.1).

Page 7, Line 10: The Exercise Coordinator shall contact the Incident Commander to inform them of the specifics of an actual emergency. The Incident Commander will make the actual determination as to what resources shall be dispatched.

AMS Response: Once an actual on-site emergency has been declared, the Exercise Coordinator ceases to serve any purpose, and the provisions of the Emergency Plan, as far as AMS response actions are concerned, are in force. All subsequent communications with first responders, even if they are already on site, will be between the AMS Emergency Manager (RSO) and the agency representative. To ensure these circumstances are clear, page 7, line 11 will be modified to read: "... inform him/her of the facility status. At that time, the Emergency Exercise Organization shown in Figure 2 will cease to exist. Concurrent with this ..."

Page 11, Line 3: The Division of Fire as well as other "first responders" should all be involved in the planning process for this drill.

AMS Response: AMS concurs with this comment. It is for this purpose that a draft of the Exercise Plan was forwarded to each first responder for review and comment. AMS would also be pleased to discuss the details of the Plan further during a pre-drill meeting with interested first responders (see response to Comment A.1).

Page 11, Line 4: Due to shift change and overtime issues, the Division of Fire will have to restrict its' hours of participation from 10:00 a.m. to 4:00 p.m. All fire units involved . . . etc.

AMS Response: AMS concurs with this comment (see response to Comment A.3). Therefore, page 11, line 4, column 4, "Due Date", will be modified to read: "January 28, 1998 at approximately 11:00 a.m."

Page 14, Line 1, Figure 1: The Division of Fire recognizes this organizational chart as an AMS document only. According to . . . etc.

AMS Response: See response to comment on Page 2, Line 23 and remaining document.

Page 19, Line 12: Again, due to issues of shift change and overtime, the Division of Fire can participate only from the hours of 10:00 a.m. to 4:00 p.m.

AMS Response: AMS concurs with this comment (see response to Comment A.3). Therefore, page 11, line 4, column 4, "Due Date", will be modified to read: "January 28, 1998 at approximately 11:00 a.m."

Page 20, Line 3: Robert M. Derrit, Acting Chief.

AMS Response: Page 20, line 3, column 3, "Designated Representative", will be modified to read: "Robert M. Derrit, Acting Chief".

Page 20, Line 11: Mr. Edmund Mechlenburg is no longer with the Cuyahoga Emergency Management Division.

AMS Response: Page 20, Line 11, column 3, "Designated Representative", will be modified to read: "Mr. Murray A. Withrow".

Page 20, Line 20: The Independent Observer/Evaluator should be outside of AMS and the NRC. I would suggest that an Officer from the Cleveland Fire Training Academy fill this position.

AMS Response: The primary objective of this drill is to determine whether the AMS Emergency Plan will ensure the radiological safety of first responders and members of the general public. As such, AMS's ability to provide the necessary level of radiological safety must be evaluated by individuals with expertise in radiation safety, but with no previous involvement with AMS or its ongoing operations. However, each first responder organization will also be invited to submit the name, address and telephone number of an individual to participate as an Agency Evaluator (see Figure 2, line 2 and Table 1, line 3, column 2, "Activity", row 8). These individuals will not only be given a copy of the final Exercise Plan, but they will also be given a copy of the scenario. To ensure

agency participation in this regard is clear, Appendix B will be modified to include the participation of Agency Evaluators *other* than the USNRC.

Page 21, Line 1: Instructions and Rules for Participants should be reviewed in a meeting with the "first responders" prior to the actual exercise.

AMS Response: AMS concurs with this comment (see response to Comment A.1).

Page 22, Line 24: Will staging of the first responders be established ahead of time? What will be done for traffic control?

AMS Response: The decision to stage responders in advance of the start of the drill is left to the discretion of the responding agency. Traffic control (for other than those visitors to and observers of the drill who are known to AMS in advance) should be implemented, as necessary, by the participants if it appears to be required. AMS would be pleased to discuss traffic control for named visitors and observers during a pre-drill meeting with interested first responders (see response to Comment A.1).

Page 22, Line 26: Add: "The Exercise Coordinator will contact the Incident Commander, who will determine the course of action to be performed."

AMS Response: AMS concurs with this comment. Page 22, line 26 will be modified to read: "In case of accidents or injury, report promptly to the Exercise Coordinator who will solicit first aid or medical help without delay from the Incident Commander (Division of Fire).

Page 24, Line 27: ...and notify the Exercise Coordinator immediately, who in turn will immediately notify the Incident Commander.

AMS Response: Once an actual on-site emergency has been declared, the Exercise Coordinator ceases to serve any purpose, and the provisions of the Emergency Plan, as far as AMS response actions are concerned, are in force. All subsequent communications with first responders, even if they are already on site, will be between the AMS Emergency Manager (RSO) and the agency representative. To ensure these circumstances are clear, 24, line 26 will be modified to read: "If a real emergency occurs that affects the participants, terminate your portion of the exercise and notify the Exercise Coordinator immediately. He/she will then terminate the drill and notify the facility RSO, who will activate the AMS Emergency Plan."

Page 25, Line 12: Add: The Exercise Coordinator shall immediately contact the Incident Commander, who will determine the course of action to be performed."

AMS Response: AMS concurs with this comment. Page 25, line 12 will be modified to read: "In case of accidents or injury, report promptly to the Exercise Coordinator who will solicit first aid or medical help without delay from the Incident Commander (Division of Fire).

Page 26, Line 15:Observer Checklist (Appendix G),....

AMS Response: Page 26, line 15 will be modified to read: "If asked to complete an Observer Checklist (Appendix G), take notes throughout . . ."

Page 27, Line 1: Add: "The Exercise Coordinator shall immediately contact the Incident Commander who will determine the course of action to be performed."

AMS Response: AMS concurs with this comment. Page 27, line 1 will be modified to read: "In case of accidents or injury, report promptly to the Exercise Coordinator who will solicit first aid or medical help without delay from the Incident Commander (Division of Fire).

Page 30: Add: The scenario did not jeopardize general safety and/or personal safety of the participants.

AMS Response: AMS concurs with this statement. Page 30, line 3, column 3, "Objective", row 8 will be modified to read: "The scenario did not jeopardize AMS facility operations or security or the safety of the participants." In addition, page 2, line 20 will be modified to read: "Develop a scenario that does not jeopardize AMS facility operations or security, or the safety of the participants".