



Federal Emergency Management Agency

Washington, D.C. 20472

JUL 23 1986

MEMORANDUM FOR: Edward L. Jordan
Director
Division of Emergency Preparedness
and Engineering Response
Office of Inspection and Enforcement
U. S. Nuclear Regulatory Commission

FROM:

Richard W. Krumm
Richard W. Krumm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Offsite Radiological Emergency Preparedness for the
Davis-Besse Nuclear Power Station

In February 1981, the Ohio Plan for Response to Radiation Emergencies at Licensed Nuclear Facilities, site-specific to the Davis-Besse Nuclear Power Station (NPS), was submitted to the Federal Emergency Management Agency (FEMA) Region V for review and evaluation in accordance with FEMA's rule 44 CFR 350. A radiological emergency preparedness (REP) plan for Lucas County had not been included in the State's submission. During the Region V review process it was concluded that a separate Lucas County plan was required. In the absence of this part of the required Ohio plan, the Ohio Disaster Services Agency (ODSA) was notified that further processing of the State's submission was being placed on hold pending submittal of a Lucas County REP plan. On February 13, 1985, FEMA Region V notified ODSA of the need to either submit a Lucas County REP plan to FEMA by March 15, 1985, or submit alternative solutions.

On April 30, 1985, ODSA provided FEMA Region V with the Toledo Edison proposal to redefine the 10-mile plume emergency planning zone (EPZ) around the Davis-Besse NPS. Ohio recommended approval of the proposal which, in addition to eliminating a portion of Lucas County within the 10-mile EPZ, would have also eliminated that part of the City of Port Clinton (Ottawa County) previously included in the original planning effort. It is noted that the permanent population of the affected area of Lucas County is approximately 900 persons. However, the transient population during late Spring and Summer at the Federal and State parks within the Lucas County EPZ is estimated to average between 2,000-3,000 people, with peaks of nearly 14,000. As indicated elsewhere in this memorandum and the attachments, considerable discussion and effort has especially been devoted to resolving Lucas County planning issues. The State, of course, as well as the Nuclear Regulatory Commission (NRC) Region III and Toledo Edison were often directly involved in the various activities associated with the EPZ and planning issues. For example, the attached June 7, 1983, NRC Region III letter announced a meeting "...to discuss and resolve concerns raised by Lucas County regarding emergency preparedness

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around the Davis-Besse Station." Photocopies of the slides used at that meeting identifying issues and the chronology of key events up to that time are also attached. In addition, I have attached a copy of Toledo Edison's April 2, 1984, letter and proposed agenda for a meeting held on April 11, 1984, to discuss Davis-Besse planning issues.

FEMA Headquarters and Regional staff reviewed the State's proposal and supporting documentation to redefine the 10-mile EPZ and determined that it was not acceptable as submitted. In letters to Ohio Governor Celeste and ODSA on December 9, 1985, (copies of which were provided to you as attachments with my December 13, 1985, memorandum transmitting the exercise report of the July 16, 1985, REP exercise for the Davis-Besse NPS) we identified the specific reasons why we found the proposal to redefine the 10-mile EPZ unacceptable.

On February 4, 1986, ODSA submitted a detailed response to our letter of December 9, 1985. ODSA specified the actions taken or proposed to resolve the outstanding Davis-Besse EPZ issues. Following our review and analysis of the State's response, we provided ODSA with our determination on March 19, 1986, and identified the remaining information the State would be required to provide. ODSA was given an additional 120 days from the March 19 date to resolve the remaining outstanding issues. A copy of our March 19 letter is attached for your information.

On May 12, 1986, ODSA responded and submitted a proposed schedule to resolve the various issues. In essence, the proposal as then submitted by ODSA would have prolonged resolution of the outstanding issues until the Summer of 1987. (We had specified that all issues should be resolved no later than December 1986.) Following the State's letter of May 12, Toledo Edison requested a meeting with representatives from the NRC and FEMA regional offices and the State. The meeting was held in Chicago on May 20, 1986.

Since that time, a number of activities have occurred culminating in the recent correspondence dated July 8, 1986, (copy attached) from ODSA identifying additional actions taken or proposed to resolve the outstanding issues. Included with the July 8 letter was an attachment identifying milestones and completion dates including the following: (1) September 3, 1986--Lucas County REP plan submitted by Lucas County Commissioners for State review; (2) September 23, 1986--key players from Lucas County, Ottawa County and ODSA demonstrating certain emergency response functions in conjunction with a utility-only exercise conducted for the Davis-Besse NPS; (3) December 30, 1986--submission of a Lucas County REP plan, and revisions to the Ottawa County and State of Ohio plans to FEMA Region V for review under 44 CFR 350; (4) March 31, 1987--an exercise involving full participation by Lucas County; and, (5) April 30, 1987-- a public meeting in accordance with FEMA regulations.

Most recently, on July 16, 1986, we received a copy of the attached undated Memorandum of Understanding (MOU) signed by representatives of Lucas County, Jerusalem Township, ODSA and the Toledo Edison Company. As the MOU indicates, the parties agree to complete certain activities prior to the Davis-Besse NPS planned start-up in October 1986, as well as to interim measures which will remain in effect until the final approved Lucas County REP plan and facilities are in place.

While planning is incomplete, we believe the State and local governments have in recent months put forth a good faith effort in resolving the outstanding REP issues around Davis-Besse as indicated by the agreed to interim measures and the commitment by the parties to complete specific actions by specified dates. I would like to point out that the commitment to conduct the exercise in March 1987, (instead of June, as previously scheduled) should enable FEMA to assess the capability of Lucas County to implement its REP plan prior to the beginning of the summer season. It should be noted that FEMA has provided NRC with past REP exercise reports. The exercises were conducted on November 6, 1980, April 13, 1983, and July 16, 1985. The exercise reports were transmitted to you on March 30, 1982, May 4, 1984, and December 13, 1985, respectively.

The regional staff will continue to work with Ohio on the interim measures and steps for formal approval of the State's site-specific plans. In this regard, we are returning the previously submitted FEMA Regional Director's Evaluation to FEMA Region V. Following the completion of necessary plan modifications, exercise activity and a public meeting, we anticipate that FEMA will have sufficient information to proceed with an evaluation of the Ohio's plans under 44 CFR 350. However, should the State and local governments fail to carry out its commitments within the time frames specified, we will return the site-specific plans in accordance with our regulations.

FEMA will continue to monitor progress concerning the interim measures and the meeting of formal requirements for offsite safety. We plan to provide you with status updates following the planned drill in September and the March 1987 offsite REP exercise.

Due to NRC's current review of onsite issues and your overall responsibility for determining the adequacy of emergency planning and preparedness, please advise FEMA in writing if this information is sufficient for your deliberations and if you desire that FEMA take any other actions at this time.

Attachments
As Stated