



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

1. New --
Lucas County, Ohio
Port of Davis Besse
Lake Station
cc Shapiro

June 7, 1983

Mr. James R. Williams
State Liaison Officer
2825 W. Granville Road
Worthington, OH 43085

Dear Jim:

On June 24, 1983, NRC Region III and FEMA Region V will meet with representatives of the Toledo Edison Company to discuss and resolve concerns raised by Lucas County regarding emergency preparedness around the Davis-Besse Station.

You are invited to participate in this meeting which will commence at 11 a.m. in the Administration Building at Davis-Besse.

Please let me know of your plans to attend as your participation is central to the resolution of these issues.

Sincerely,

William B. Mencer, Director
State and Government Affairs

cc: Judy Hirsch,
Toledo Edison Co.
Daniel Bement, FEMA V

JUN 10 11 06 AM '83
FBI
FEDERAL BUREAU OF INVESTIGATION

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PDR ADCK 05000346
F PDR

TOLEDO EDISON COMPANY - EMERGENCY PLANNING
LUCAS COUNTY - KEY CHARACTERISTICS

- O APPROXIMATELY 6 SQUARE MILES, OR 1.7% OF LUCAS COUNTY IS CONTAINED IN THE DAVIS-BESSE 10 MILE EPZ.
- O 766 PERMANENT RESIDENTS - PRIMARILY LOCATED IN SECTOR P, BETWEEN 9 AND 10 MILES FROM DAVIS-BESSE -- REPRESENTS 0.2% OF THE PERMANENT LUCAS COUNTY POPULATION.
- O 5241 TRANSIENT POPULATION - PRIMARILY RECREATIONAL BOATING, SOME CAMPING AND COTTAGES - SUMMER ONLY, MAY - SEPT.
- O IN ACCORDANCE WITH THE OTTAWA COUNTY EMERGENCY RESPONSE PLAN AND THE PROPOSED LUCAS COUNTY PLAN, LUCAS COUNTY DOES NOT PROVIDE EMERGENCY RECEPTION CENTERS FOR OTTAWA COUNTY EVACUEES.
- O EMERGENCY RECEPTION CENTER FOR LUCAS COUNTY RESIDENTS IS THE CLAY HIGH SCHOOL IN OREGON, APPROXIMATELY 6 MILES FROM AFFECTED EPZ AREA.
- O LUCAS COUNTY EOC IS LOCATED IN TOLEDO, APPROXIMATELY 12 MILES FROM THE SECTOR OF LUCAS COUNTY CONTAINED IN THE 10 MILE EPZ.

TOLEDO EDISON COMPANY - EMERGENCY PLANNING

LUCAS COUNTY - CHRONOLOGY OF KEY EVENTS

OCT. 2, 1981 - LUCAS COUNTY LETTER TO OHIO DSA QUESTIONING THE ADEQUACY OF PROMPT NOTIFICATION SYSTEM (PNS) AND THE EXISTING RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR LUCAS COUNTY.

OCT. 23, 1981 - OHIO DSA RESPONSE TO OCTOBER 2 LETTER. EXPLAINED TOLEDO EDISON ACTIVITIES REGARDING REVIEW OF PNS ADEQUACY. INDICATED THAT FEMA - REGION V INFORMALLY REVIEWED/APPROVED STATE PLAN PLUS LUCAS COUNTY APPENDIX.

DEC. 31, 1981 - LUCAS COUNTY LETTER TO TOLEDO EDISON RAISING CONCERN REGARDING PROMPT NOTIFICATION SYSTEM IN LUCAS COUNTY.

JAN. 1982 - TOLEDO EDISON INSTALLS 32 NEW SIRENS, INCLUDING 2 SIRENS IN LUCAS COUNTY.

JAN. 8, 1982 - TOLEDO EDISON LETTER TO LUCAS COUNTY INDICATING NEW PROMPT NOTIFICATION SYSTEM ANALYSIS RESULTS AND DESIRE FOR CONTINUATION OF "EXCELLENT WORKING RELATIONSHIP".

JUNE 29, 1982 - FEMA - REGION V LETTER TO OHIO DSA RAISING CONCERN ABOUT THE LACK OF A STAND-ALONE LUCAS COUNTY PLAN. FEMA WILL HOLD ON REVIEW OF THE DAVIS-BESSE OFFSITE EMERGENCY PREPAREDNESS UNTIL A SPECIFIC PLAN FOR LUCAS COUNTY IS PREPARED.

LUCAS COUNTY - CHRONOLOGY OF KEY EVENTS
CONTINUED

- JULY 12, 1982 - LUCAS COUNTY, TOLEDO EDISON, OTTAWA COUNTY AND OHIO DSA MEETING AT DAVIS-BESSE - LUCAS COUNTY AND OHIO DSA SEE NO PROBLEMS WITH TOLEDO EDISON HIRING A CONSULTANT TO PREPARE THE LUCAS COUNTY PLAN.
- JULY 15, 1982 - TOLEDO EDISON ISSUES PURCHASE ORDER REQUISITION TO EDS NUCLEAR TO PREPARE LUCAS COUNTY EMERGENCY RESPONSE PLAN.
- SEP. 22, 1982 - EDS COMMENCES WORK ON PREPARING LUCAS COUNTY EMERGENCY PLAN- PLANNING MEETING HELD AT DAVIS-BESSE WITH LUCAS COUNTY, OTTAWA COUNTY, OHIO DSA, AND TOLEDO EDISON REPRESENTATIVES.
- DEC. 15, 1982 - EDS SUBMITS DRAFT PLAN TO LUCAS COUNTY.
- JAN. 7, 1983 - LUCAS COUNTY LETTER TO TOLEDO EDISON - ACKNOWLEDGING PLAN AS AN "EXCELLENT JOB", IDENTIFYING POSSIBLE PROBLEMS WITH THE COSTS FOR IMPLEMENTING THE PLAN.
- JAN. 24, 1983 - EDS TRANSMITS REVISED PLAN CONTAINING CHANGES REQUESTED BY LUCAS COUNTY DSA.

LUCAS COUNTY - CHRONOLOGY OF KEY EVENTS
CONTINUED

- FEB. 10, 1983 - FEMA - REGION V LETTER TO OHIO DSA REQUESTING SUBMISSION OF LUCAS COUNTY PLAN BY FEB. 18. NO PROCESSING OF REGIONAL DIRECTORS EVALUATION OF DAVIS-BESSE WILL OCCUR UNTIL THE PLAN IS DEVELOPED AND EXERCISED. FEMA SUGGESTS DELAYING 1983 EXERCISE IF PLAN IS NOT SUBMITTED.
- FEB. 18, 1983 - TOLEDO EDISON LETTER TO LUCAS COUNTY DISCUSSING THE AVAILABLE SUPPORT POSSIBILITIES TO LUCAS COUNTY - INCLUDED TAX DOLLARS, EDS ACTIVITIES, FEDERAL COST SHARING.
- FEB. 25, 1983 - LUCAS COUNTY LETTER TO TOLEDO EDISON REQUESTING EMERGENCY PLANNING SUPPORT FROM TOLEDO EDISON IN LIEU OF THAT REFERRED TO IN THE FEB. 18 LETTER.
- MAR. 30, 1983 - OHIO DSA LETTER TO LUCAS COUNTY INDICATING THAT LUCAS COUNTY WILL NOT BE EVALUATED AS PART OF THE 1983 EXERCISE. DISCUSSED POSSIBILITY OF A REDUCED EPZ.

TOLEDO EDISON COMPANY - EMERGENCY PLANNING
LUCAS COUNTY - EXISTING SITUATION

- O ADOPTED STATE RADIOLOGICAL EMERGENCY RESPONSE PLAN -
INCLUDES LUCAS COUNTY AS APPENDIX TO OTTAWA COUNTY PLAN.
- O COUNTY SPECIFIC RADIOLOGICAL EMERGENCY RESPONSE PLAN HAS
BEEN PREPARED BY CONSULTANTS RETAINED BY TOLEDO EDISON
WORKING CLOSELY WITH LUCAS COUNTY PERSONNEL.
- O ALL SUBMITTED COMMENTS FROM LUCAS COUNTY HAVE BEEN
INCORPORATED INTO COUNTY SPECIFIC PLAN.
- O LUCAS COUNTY SPECIFIC PLAN CURRENTLY NOT APPROVED BY
COMMISSIONERS - PROBLEM RELATED TO COST REIMBURSEMENT FOR
LUCAS COUNTY PERSONNEL TIME AND EXPENSES AND COSTS FOR
JERUSALEM TOWNSHIP "DECONTAMINATION CENTER".

TOLEDO EDISON COMPANY - EMERGENCY PLANNING

LUCAS COUNTY - TOLEDO EDISON POSITION

- O EXISTING EMERGENCY PREPAREDNESS AROUND THE DAVIS-BESSE NUCLEAR POWER STATION ADEQUATELY ASSURES THE PROTECTION OF PUBLIC HEALTH AND SAFETY OF LUCAS COUNTY RESIDENTS EVEN ASSUMING THE HIGHLY IMPROBABLE EVENT THAT RADIATION IS RELEASED FROM THE DAVIS-BESSE PLANT.
 - RADIOLOGICAL EMERGENCY RESPONSE PLANS EXIST TO PROTECT THE PUBLIC IN LUCAS COUNTY.
 - STATE OF OHIO RADIOLOGICAL EMERGENCY RESPONSE PLAN ASSURES STATE SUPPORT TO THE COUNTY IF REQUIRED.
 - EXISTING SOURCE-TERM ASSUMPTIONS CREATES A CONSERVATIVELY LARGE EPZ, WHICH IS THE ONLY REASON THAT LUCAS COUNTY IS ACTUALLY IN THE DAVIS-BESSE EMERGENCY PLANNING ZONE.
- O TOLEDO EDISON WOULD REIMBURSE LUCAS COUNTY FOR:
 - ACTUAL PERSONNEL COSTS ASSOCIATED WITH DAVIS-BESSE RELATED RADIOLOGICAL EMERGENCY TRAINING FOR DISASTER SERVICES PERSONNEL.
 - ACTUAL PERSONNEL COSTS AND ASSOCIATED EXPENSES FOR PERMANENT EMPLOYEES IN LUCAS COUNTY DEPARTMENTS, OTHER THAN DISASTER SERVICES, INCURRED AS A RESULT OF DAVIS-BESSE RELATED RADIOLOGICAL EMERGENCY RESPONSE TRAINING, DRILL/EXERCISE PARTICIPATION AND ASSOCIATED PREPARATION AND CRITIQUES.
 - TOLEDO EDISON SEES NO NEED TO FUND A NEW DECONTAMINATION CENTER FOR LUCAS COUNTY.

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April 2, 1984



A84-194H
EPL #84-009
E 1.30.2
E 1.33.3

Mr. Wallace Weaver, RAC Chairman
Federal Emergency Management Agency
Region V
One North Dearborn Street, Room 540
Chicago, Illinois 60602

Dear Mr. Weaver:

In accordance with our recent telephone conversation, I would like to confirm that Toledo Edison representatives plan to meet with you, other Federal Emergency Management Agency (FEMA) representatives, and Nuclear Regulatory Commission (NRC) personnel at the FEMA Region V offices in Battle Creek, Michigan, on Wednesday, April 11, 1984, at 1:30 P. M. The personnel representing Toledo Edison that will attend the meeting include:

Ted J. Myers - Director, Nuclear Services - Toledo Edison
Judith Hirsch - Emergency Planning Supervisor - Toledo Edison
Thomas Kevern - Operations Director - NUTECH Engineers
Marvin Fertel - Vice President - Delian Corporation

Toledo Edison feels there are actions that can be supported to resolve the acceptance of the State of Ohio Radiological Emergency Response Plan. From our perspective, to aid in that goal, we would like this meeting to accomplish the following objectives:

1. Clarify the current status of the State of Ohio Radiological Emergency Response Plan, including clarification of the background leading up to the current status.
2. Present the current status of Toledo Edison activities towards finalizing the Davis-Besse Emergency Planning Zone (EPZ) and resolving the concerns on the part of FEMA in regards to Lucas County.
3. Identify the follow up actions and associated organizational responsibilities required to finalize the Davis-Besse EPZ and, therefore, obtain approval from FEMA of the State of Ohio Radiological Emergency Response Plan.

Given these stated objectives, we would like to propose a meeting agenda as presented on Attachment A. As you will note from the agenda, we have identified the basic information that we would like discussed for each item. With regard to the information we are requesting from FEMA, we have

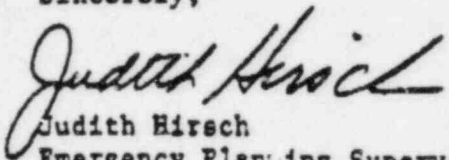
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EPL #84-009
April 2, 1984
Page 2

specified a series of statements that would provide that information as part of agenda Item I.

I trust this letter and the attached agenda are responsive to your needs. If you desire additional information from us relative to the material on the agenda, or if you have any questions concerning the information being requested from FEMA, please don't hesitate to contact me.

Sincerely,



Judith Hirsch
Emergency Planning Supervisor

JH:MSF:nlf
encl.

cc: T. J. Myers
Monte Phillips, NRC
Rolland Lickus, NRC
Thomas Kevern, NUTECH
Marvin Fertel, Delian

120A

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Attachment A

PROPOSED AGENDA
April 11, 1984 Meeting
Federal Emergency Management Agency/Nuclear Regulatory
Commission/Toledo Edison Company

I. Clarification of Status of State of Ohio Radiological
Emergency Response Plan - FEMA

- Results of the RAC review
- Formal correspondence existing between FEMA Region V - State of Ohio, NRC Region III, FEMA National regarding the State Plan
- Results and recipients of reviews of the State Plan performed by Region V
- Results and recipients of reviews of the State Plan performed by FEMA - National
- Current status of FEMA's review of the State Plan
- Issues preventing the completion of the review and approval of the State Plan by FEMA - Region V and FEMA - National
- FEMA's position(s) regarding the Lucas County issues and basis for those positions

II. Discussion of TED Activities Since the June Meeting with FEMA
and the NRC and the State of Ohio - Toledo Edison

1. Background Chronology Leading up to the June Meeting
2. Activities Subsequent to the Meeting
 - Regulatory Review of Davis-Besse EPZ Compliance and Emergency Planning review to finalize EPZ boundaries

III. Identification of Follow Up Activities

- Actions required
- Responsible parties: TED, FEMA, NRC
- Schedule

DISPATCHED

MAR 19 1986

Mr. Richard M. Lockhart
Adjutant General's Department
Deputy Director
Ohio Disaster Services Agency
2825 West Granville Road
Worthington, Ohio 43624

200 MAR 10 PM 2:54

FEDERAL
OPERATIONS

Dear Mr. Lockhart:

Thank you for your letter of February 4, 1986, with supporting documentation, concerning the proposed resolutions for the plume exposure pathway emergency planning zone (EPZ) for the Davis-Besse Nuclear Power Station (NPS). Specifically, your correspondence addressed the five areas of concern identified in our letter of December 9, 1985, concerning the State's April 30, 1985, proposal to change the plume EPZ.

We appreciate the positive, thorough and timely manner of your response, and the cooperation of local officials.

FEMA's response to the actions taken or proposed by the Ohio Disaster Services Agency (ODSA) for each of the five geographical areas affected by the 10-mile Davis-Besse EPZ as contained in the "EPZ Realignment Proposal Follow-Up Report" submitted on February 4, 1986, is outlined below. A more detailed review of the issues by FEMA Region V is attached.

- (1) City of Port Clinton--FEMA had determined that the entire geographic area of the city had to be included in the plume EPZ, or an acceptable justification for excluding all or part of the city submitted.

ODSA Response

The city has repealed its earlier resolution removing itself from the EPZ and has entered into a memorandum of understanding (MOU) with the Toledo Edison Company. The MOU identifies assistance to be provided to the city to ensure adequate planning and preparedness. Port Clinton's planning requirements will be included in the Ottawa County Radiological Emergency Preparedness (REP) plan in accordance with FEMA regulations and NUREG-0654 guidance. The city agrees to participate in exercises, drills and training as appropriate.

FEMA Decision

The actions taken and those proposed are appropriate. It should be noted, however, that the Ottawa County plan revision must be submitted to FEMA Region V within 120 days of the date of this letter. (Note: See also requirement for a public meeting on page 4.)

- (2) Ottawa County (exclusive of the City of Port Clinton)--FEMA had determined that more justification was needed for geopolitical boundary changes.

ODSA Response

Ottawa County has proposed three major changes to the EPZ affecting Benton Township, Harris Township and the City of Port Clinton. Justification for the changes has been provided. It is noted that additional sirens will be required to ensure complete coverage of the areas added to the EPZ. The utility has agreed to provide the sirens needed for full coverage. A small portion of Harris Township containing 15 permanent households and a small campground used primarily by migrant workers has been recommended for exclusion. Should protective actions be necessary for this area, notification would be through sirens and door-to-door verification.

FEMA Decision

The proposed actions are appropriate. However, ODSA will be required to provide written assurance, as part of the State's annual plan certification, that there is no significant population at risk (permanent or transient) within that portion of Harris Township to be excluded from the EPZ.

- (3) Lucas County--FEMA had determined that a REP plan must be developed in accordance with the guidance in NUREG-0654.

ODSA Response

ODSA correctly points out that FEMA's December 9, 1985, letter and accompanying FEMA staff report apparently left "...some leeway for development of a possible compromise that would satisfy the desires of local government and still meet the demands of FEMA." Accordingly, ODSA submitted additional supporting justification/documentation for exclusion of Lucas County from the EPZ.

FEMA Decision

Due to the substantial population (2,700 peak maximum) potentially at risk, and for the reasons cited in the attached FEMA Region V review, FEMA's final decision is that an approved REP plan for Lucas County must be submitted to FEMA Region V within 120 days. This plan may be a Lucas County plan or an annex to the Ottawa County plan. However, if the plan is an annex to the Ottawa County plan there must not be any questions or doubt as to the legality of such an arrangement or to its implementation. As you know, FEMA placed the original Davis-Besse REP submission on hold in 1982 because of the "...potential of opera-

tional, logistical, and legal complications..." associated with Ottawa County taking protective actions for Lucas County. Since that time, FEMA has not been advised that these potential problems have been resolved. Therefore, if these same concerns should exist for the future plan for Lucas County, FEMA will have no alternative but to return the State's original submission and take action in accordance with FEMA regulations. Any plan, of course, must comply with all applicable FEMA regulations and NUREG-0654.

In addition, dates for a full-scale exercise of the plan and a public meeting (see page 4 for explanation of the public meeting requirement) must be agreed to within the 120-day period. The exercise and public meeting must occur within calendar year 1986.

- (4) Lake Erie--FEMA had determined that the U. S. Coast Guard (USCG) needed to be consulted and several apparent inconsistencies needed to be addressed related to West Sister Island and the Lake Erie EPZ boundary.

ODSA Response

Ohio submitted information clarifying the issues. West Sister Island is a bird sanctuary closed to the public; the USCG has been consulted; and, the EPZ boundary inconsistencies have been resolved.

FEMA Decision

FEMA finds the State's actions appropriate.

- (5) Sandusky County--FEMA had determined that Ohio would have to provide written assurance annually that there is no population at risk within that portion of the County to be excluded, and County officials would have to review and accept the EPZ proposal.

ODSA Response

ODSA has provided further justification for excluding the County from the EPZ and noted that the area to be excluded is either marshland or rural farmland with no known plans for major development. Field surveys revealed there are 12 households in the area recommended for exclusion. Further, the proposed EPZ is supported by written documentation from the Rice Township Trustees and the Sandusky County Commissioners.

FEMA Decision


FEMA finds ODSA's actions appropriate. However, it will be necessary for the State to provide written assurance, as part of the State's annual plan certification, that there is no significant population at risk (permanent or transient) within that portion of Sandusky County excluded from the 10-mile EPZ.

A public meeting to discuss State and local REP plans in accordance with Section 350.10 of 44 CFR 350 is being required because of the long period of time which has elapsed since the November 7, 1980, public meeting and the changes associated with local plans and the EPZ over the past several years.

If the State is not able to provide the information required within 120 days of the date of this letter, we will be required to take action in accordance with FEMA regulations.

FEMA is eager to continue cooperation with Ohio so that the necessary information for the long sought-after approval under FEMA rule 44 CFR 350 can be provided within the 120-day time period.

Sincerely,


Samuel W. Speck
Associate Director
State and Local Programs
and Support

Attachment
As Stated

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2625 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085-2712

DISASTER SERVICES AGENCY

AGOH-DS

July 8, 1986

Mr. Wallace Weaver, Chairman
Regional Assistance Committee
Federal Emergency Management Agency
Region V
300 South Wacker Drive
Chicago, IL 60606

Dear Mr. Weaver:

This letter is a follow-up to the conference call of June 30, 1986, between you and representatives from the Toledo Edison Company and this agency. As a result of that telephone call, we have compiled a listing of milestones and completion dates leading up to and including an exercise and public meeting. A progress report will be provided to you periodically or as milestones, as listed in the attachment, are completed.

During our telephone conversation, the possibility of Lucas County officials demonstrating certain aspects of their "All Hazards Plan" during the September 23rd utility exercise was discussed. Lucas County does not have a completed "All Hazards Plan" but does, however, have an Emergency Operations Plan (EOP) that has been used in the past for disasters and drills. Based on conversations with Lucas County Civil Defense officials, they would be willing to demonstrate certain aspects of this EOP with key personnel during the September drill.

Presently, the Ottawa County Radiological Emergency Response (RER) Plan is being revised to incorporate changes brought about by the inclusion of Port Clinton and Lucas County planning activities. The Ottawa County Plan and the revised State Plan will be ready for submission along with the Lucas County Plan prior to December 30, 1986.

In meetings with the U.S. Coast Guard, the western boundary of the waterway Emergency Planning Zone (EPZ) was changed to reflect the inclusion of Coast line in Jerusalem Township. The western boundary, which was described as "a line extending northeasterly from Ward's Canal (located approximately 1.5 miles southeast of Reno Beach, Ohio) to the southwest tip of West Sister Island" has been changed to read "a line extending northeasterly from Coolie Canal to the southwest tip of West Sister Island." The Coast Guard has agreed to draft a new letter of agreement to reflect this change. This letter of agreement will be included in the revised State RER Plan.

TO: Mr. Wallace Weaver
RE: June 30, 1986 Conference Call

July 8, 1986
Page 2

Based on the progress to date in meeting obligations outlined in previous correspondence to FEMA, I am confident that we will be able to bring together the resources, cooperation and efforts of all parties concerned to ensure the completion and testing of adequate plans to protect the public within the EPZ for the Davis-Besse Nuclear Power Station. If you have any questions, please do not hesitate to contact me.

FOR THE DIRECTOR



RICHARD M. LOCKHART
Deputy Director

DM:kjs

Attachment: as stated

cc: James Greer, Ottawa County Disaster Services Agency
Donald Hickey, Toledo-Lucas County Civil Defense
Jennifer Wasilk, Toledo Edison Company

Ohio Disaster Services Agency

MILESTONESDavis-Besse Nuclear Power Station
Offsite Emergency Planning

<u>COMPLETION DATE</u>	<u>MILESTONE</u>
July 15, 1986	Working draft of Lucas County Radiological Emergency Response Plan submitted to Lucas County officials for review.
July 30, 1986	Memorandum of understanding pertaining to emergency planning signed by Lucas County Commissioners, Jerusalem Township Trustees, Ohio DSA and Toledo Edison Company.
Aug. 15, 1986	Lucas County officials complete review of Lucas County RER Plan.
Aug. 1986	Public forum conducted in Jerusalem Township to acquaint trustees and residents with Lucas County RER Plan and the memorandum of understanding (date to be announced but prior to Plan submittal to the State).
Sept. 1, 1986	Rewrites incorporating County review changes completed.
Sept. 3, 1986	Lucas County RER Plan submitted by Lucas County Commissioners for State of Ohio review.
Sept. 10, 1986	State completes review of Lucas County RER Plan and returns Plan for any needed corrections.
Sept. 23, 1986	Key players from Lucas County, Ottawa County and Ohio DSA demonstrate certain emergency response functions in conjunction with a utility-only exercise conducted for Davis-Besse Nuclear Power Station.
Nov. 15, 1986	Lucas County officials complete review of training program modules.
Dec. 1, 1986	Training for Lucas County emergency workers begins.

MILESTONESCOMPLETION DATEMILESTONE

Dec. 30, 1986	The Lucas County RER Plan, and revisions to the Ottawa County and State of Ohio Plans submitted to FEMA V for an informal review as provided for under Title 44, Part 350 of the Code of Federal Regulations.
Jan. 15, 1987	State and Toledo Edison jointly submit exercise objectives to FEMA and NRC Regional Offices.
Jan. 31, 1987	Ohio DSA provides written assurance, as part of the State's annual plan certification, that the number of people at risk in the portions of Sandusky and Ottawa Counties that are within the 10-mile radius but excluded from the emergency planning zone is not significant.
Feb. 13, 1987	State and Toledo Edison submit exercise scenario to FEMA and NRC Regions for review.
Mar. 31, 1987	Emergency response exercise conducted.
Apr. 30, 1987	Public meeting conducted.

MEMORANDUM OF UNDERSTANDING
FOR PROTECTION OF CITIZENS IN JERUSALEM TOWNSHIP

Background

Jerusalem Township lies within the ten mile radius of the Davis-Besse Nuclear Power Station in Ottawa County, but is not currently included in the planning efforts of the ten mile Emergency Planning Zone (EPZ) as described in the Ohio Plan for Response to Radiation Emergencies at Licensed Nuclear Facilities. There has been since 1983 an operating siren warning system in Jerusalem Township as well as the necessary communications links with Lucas County at their emergency facilities. Warning implementation measures have been in place since then and are addressed in the Ottawa County Emergency Plan, Section PII-E-6.

Status of Lucas County Plan

The parties to this agreement concur that the following activities associated with the protection of the residents of Jerusalem Township will be complete by the planned October start-up of the Davis-Besse Nuclear Power Station.

- The existing siren warning system will be upgraded.
- The Lucas County Emergency Plan will be developed.

Memorandum of Understanding
§ 1.35
Page 2

- The Lucas County Emergency Plan Implementing Procedures will be developed.

It is also recognized that the following activities cannot be completed in that frame:

- Completion of the upgrade of the Lucas County Emergency Operations Center.
- Conduct of classroom training, drills and an exercise on the Lucas County Emergency Plan.
- Detailed reviews, comment resolution, and State of Ohio approval for the Lucas County Emergency Plan and Implementing Procedures.

The parties further recognize that it is essential to continue with the posture that provides reasonable assurance that the residents of Jerusalem Township are afforded complete protection. To continue providing this assurance, the parties agree to the following interim measures which will remain in effect until the final approved Lucas County Emergency Plan and facilities are in place. The facilities completion is scheduled for March, 1987.

- In the event of any emergency declaration, Toledo Edison will establish a continuously manned communication post in or in close proximity to

Memorandum of Understanding

E 1.35

Page 3

the fire station in Jerusalem Township to provide a redundant, dedicated communication link with Davis-Besse, Ottawa County Emergency Operations Center (EOC), and the existing Lucas County Emergency Operations Center (EOC).

- Toledo Edison will continue to provide a dedicated communication link from its Emergency Control Center (EOC) at Davis-Besse to the Lucas County EOC which will be in addition to the present ring down telephone circuit located in the Lucas County EOC.
- Lucas County commissioners will on the advice of Toledo-Lucas County Civil Defense representatives in accordance with information provided by Toledo Edison and the officials of Ohio Disaster Services Agency (ODSA) exercise their existing emergency decision making process to order protective actions for Jerusalem Township by activating the existing available command and control structure that the county implements for non-radiological emergencies.
- Upon activation, Lucas County and Jerusalem Township Officials will bring to bear all of the facilities and resources at their disposal to implement any and all necessary protective actions. This would include local fire and ambulance services, local law enforcement agencies and the County Sheriff's Department acting in concert to respond to the situation following existing plans and procedures normally utilized for other types of emergency response situations.

Memorandum of Understanding

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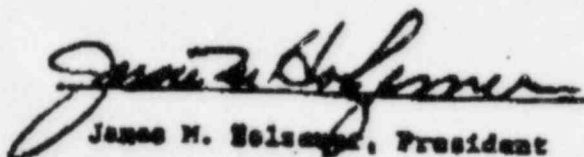
Page 4


- " Toledo Edison will assure that provisions are in place to provide for the treatment of any injured contaminated Jerusalem Township residents at trained/equipped medical facilities. Note: One of the major medical facilities involved in the existing Ottawa County Plan for Response to Radiation Emergencies at Licensed Nuclear Facilities is located in Lucas County and can be utilized by Lucas County in the event of an incident.
- " Toledo Edison will produce and distribute updated Public Information Brochures in Jerusalem Township which will address the inclusion of Jerusalem Township and provide the appropriate information to direct the citizens to take the correct actions.
- " Jerusalem Township Trustees will provide a forum for Toledo Edison, Ohio Disaster Services Agency (ODSA), and Lucas County to explain these interim measures to the residents of Jerusalem Township.
- " Toledo Edison will provide a direct initial communication line to the Lucas County Sheriff's Office, as is currently done for the Ottawa County Sheriff's Office.
- " Ohio Disaster Services Agency (ODSA) will provide a representative to respond to the Lucas County ROC to provide assistance in any incident related to Davis-Besse.

Memorandum of Understanding
E 1.35
Page 3

- Toledo Edison will also provide a qualified representative to respond to the Lucas County EOC to provide assistance in any incident related to Davis-Besse.

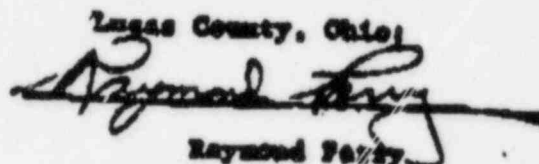
Board of County Commissioners
Lucas County, Ohio:


James M. Holsinger, President

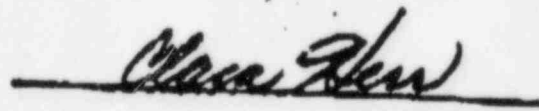

Al Hawkins, Member

Not Present
Sandy Isenberg, Member

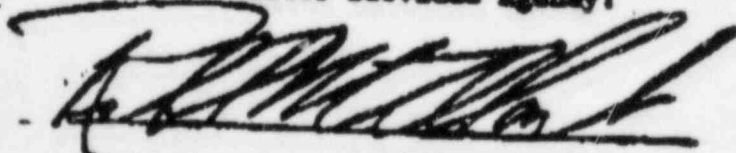
Jerusalem Township Trustees
Jerusalem Township,
Lucas County, Ohio:


Raymond Falty

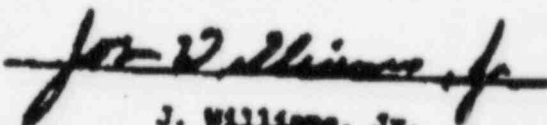
Not Present
John Henning


Clara Barr

Ohio Disaster Services Agency:


Richard N. Lockhart, Deputy Director

Toledo Edison Company


J. Williams, Jr.
Senior Vice President, Nuclear

RAV:lry

06/19/86