

MAR 20 1987

MEMORANDUM FOR: Docket No. 50-331

FROM: W. D. Shafer, Chief, Emergency Preparedness and
Radiological Protection Branch

SUBJECT: FEMA CONCERNS WITH DAEC OFF-SITE EMERGENCY PLANS
FOR THE CITY OF CEDAR RAPIDS, IOWA

On March 10, 1987, Region III was informed that FEMA Region VII had concerns with the adequacy of emergency planning for the city of Cedar Rapids, Iowa. The 10-mile EPZ for the Duane Arnold Energy Center intersects approximately half of the city of Cedar Rapids and does not include the entire city limits.

Reportedly, after reviewing the licensee's Emergency Plan and other documentation distributed to the citizens of Cedar Rapids, FEMA VII informed Region III by telephone on March 10, 1987 that the licensee was misrepresenting the amount of population coverage in their Emergency Plan because of the following:

1. The licensee's Emergency Plan implies that the entire city of Cedar Rapids is encompassed in the plan and the licensee informed FEMA that this was never intended.
2. The emergency planning pamphlet issued to every household and published in the Cedar Rapids telephone directory clearly indicates that the entire city of Cedar Rapids is covered by the Plan.

On March 11, 1987, Region III again contacted FEMA VII, by telephone and the same individual (Mr. F. Bagley), stated that he had never used the term misrepresentation in his discussion of these issues. He stated that persons in FEMA headquarters had called the issues "misrepresentations" but he did not agree with them. He further stated that he did have problems with the Emergency Plan but expected to resolve the issues with the licensee through normal FEMA procedure.

On March 11, 1987, Region III discussed with licensee representatives the concern expressed by FEMA VII. The licensee representative acknowledged that their Emergency Plan implies total coverage of the city of Cedar Rapids and stated, however, that such coverage was never required by regulation nor was full coverage intended.

8703300338 870320
PDR ADOCK 05000331
F PDR

110
IE35

2 MAR 20 1987

Regarding the pamphlet issued to the public, they stated that they had discussed evacuation of the entire city with the Mayor of Cedar Rapids and had included, in the pamphlet, evacuation plans for those portions of the city that were outside the 10-mile EPZ, as an option that was available if the Mayor elected to do so. Reportedly, the Mayor preferred to not evacuate the entire city if at all possible.

Further evidence of licensee intent can be determined by reviewing the Lynn County Emergency Plan which clearly shows that evacuation of children located inside the 10-mile EPZ will be accomplished by transporting them to another location outside the 10-mile EPZ, but still in the city limits of Cedar Rapids. (The Lynn County Emergency Plan was approved by FEMA in 1985; more than two years ago.)

One final comment on this issue is appropriate. The requirement that if the 10-mile EPZ intersects a portion of a city, then the entire city limits must be included in the EPZ, is a current interpretation made by FEMA and may be a generic problem for all nuclear power plant licensees.

As a result of the above described telephone discussions and after review of the licensee's emergency planning program we have concluded that there was no deliberate attempt by the licensee to deceive the public or to misrepresent their Emergency Plan to any Federal agency.

"Original signed by W.D. Shafer"

W. D. Shafer, Chief
Emergency Preparedness and
Radiological Protection Branch

cc: J. A. Hind
C. Weil
E. Pawlik
D. Matthews, EPB, IE

RIII *gpr*
Patterson/as
03/20/87
Y20

RIII
Peterson

RIII
WGS
Snell
3/20/87

RIII
WGSfor
Shafer
3/20/87