

SEP 16 1986

Mr. Ihor W. Husar, Chairman  
Regional Assistance Committee  
U. S. Federal Emergency Management Agency  
Region II  
26 Federal Plaza  
New York, New York 10278

Dear Mr. Husar:

Congratulations on your appointment as Chairman of the Regional Assistance Committee. I and my staff are looking forward to working with you and the Committee you chair.

The staff of the Emergency Preparedness Section has reviewed the New Jersey State Government's response to the RAC review comments for the Oyster Creek off-site plan. This has been done in response to your request and in conformance with 44 CFR 351.21(i). The work sheets are attached.

Twenty-nine responses were evaluated with respect to response and revision. Twenty-seven responses were deemed adequate; eighteen revisions were similarly classified. Only two elements were assigned "inadequate" for both response and revision; they are criteria H.10 and H.11 found on page 15 of the work sheets. The inadequacies are non-substantive. The Plan is complete and detailed in almost all respects and could well serve as a model for similar plans; it is one of the better Plans reviewed.

Three criteria G.3.a., J.9 and K.4, warrant note here. The first criterion was rated adequate by the RAC and a State response is not normally in order, yet a hand written one appears in the State Response Column. This response notes establishment of an alternate news center. The location of the existing news center is acceptable. There is no requirement to provide an alternate news center.

The State's responses to criteria J.9 and K.4 contain references to the ALARA concept. The NRC imposes legally binding dose control regulations on licensees for planned activities, that is normal operation. ALARA (see Appendix I to 10 CFR 50) is one of these. ALARA does not apply to emergencies. If New Jersey wishes to establish this policy, it may do so. But, the Plan should then specify how the present worth of the future cost of averted health effects will be determined and balanced against the cost of protective action and dose savings. EPA in its "Manual of Protective Actions and Protective Action Guides" states in Section 1.6.1 "... the goal is maximum protection of the public with the least cost and disruption. Costs and risks must be balanced." And, in Section 2.6, EPA further notes "... population dose be kept as low as possible...".

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Mr. Ihor W. Husar

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Effective September 1, 1986, Emergency Preparedness Staff assignments were rotated. Charles G. Amato is the lead inspector for all New Jersey reactors and is also assigned the RAC responsibility.

If you have any questions or comments, contact me at (FTS) 488-1208 or Charles Amato at (FTS) 488-1394.

Sincerely,

Original Signed By:

William J. Lazarus, Chief  
Emergency Preparedness Section  
Division of Radiation Safety  
and Safeguards

Enclosure: As stated

cc w/encl:  
J. O'Sullivan, FEMA RII

cc w/o encl:  
C. Amato  
J. Hawxhurst

RI:DRSS  
Amato *Amato*  
9/10/86

RI:DRSS  
Hawxhurst *Amato*  
9/10/86 *for JAH*

RI:DRSS *WJL*  
Lazarus  
9/16/86

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ANNEX B: RADIOLOGICAL EMERGENCY RESPONSE PLAN FOR OYSTER CREEK  
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NRC RI *Cognate* 08/09/86

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
A.  A.1.a  A.1.b  A.1.c	<p><u>Assignment of Responsibility (Organization Control)</u></p> <p>The response organizations are identified in Sections B-1-IV-A, B-II-E, and Figure B-III-1. Previous comments have been adequately addressed.</p> <p>In Sections B-1-III and B-1-IV-A the concept of operations and the relationship of each agency to the total effort are specified.</p> <p>The interrelationships of the organizations having an operational role are illustrated in Table B-1-2; however, this table is not consistent with the plan.</p> <p>Table B-1-2 still needs clarification. The four functional groups of Ocean County OEM do not correspond to Agency Matrix. Groups 3 and 4 on matrix is OEM and Support Division (on the same line) and on the legend Groups 3 and 4 are H.E.W.S. Group and Public Works Group. Also, the lead responsibility and support roles in the matrix do not coincide with the Plan. Page B-1-18 designates the Sheriff's Dept. as the lead county agency</p>	A  A  I	<p>Table B-1-2 has been revised to reflect the Agency Matrix, and the responsibilities designated in the plan.</p>		<p>Based on a check of the material in Vol 1, Appendix 1, Tables, it appears the clarification requested has been made</p>	A	A



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NRC RI *CRG note 07/08/86*

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
A.1.c Cont'd	For Access Control with Support from NJSP, but the matrix shows NJSP as lead responsibility. On page B-1-19, the County OEM is designated as the lead county agency for Personnel, Monitoring & Record Keeping, but the matrix shows BRP. Page B-1-18 designates the County OEM as the lead County agency to coordinate the County Food, Water and Milk Control operations. As required to support State operations and Table B-1-3 also designates County OEM as lead agency but Table B-1-2 designates BRP as lead responsibility. Page B-1-19 states the County OEM will support the ARC which is the lead agency for Mass Care, but Table B-1-2 shows OEM/Support Divisions as lead responsibility.						
A.1.d	Specific individuals in charge of the emergency response are identified by title in Table B-1-3 and Section B-1-IV-A, pages B-1-16 to B-1-23.	A					
A.1.e	24-hour per day emergency response, including 24-hour per day manning of communications links is indicated in Section B-1-IV-A.1.1, page B-1-17 and Section B-1-III-B.1, page B-1-15.	A					



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A.2.a	Functions and responsibilities, both primary and support, for major elements and key individuals are identified in Section B-1-IV and in Table B-1-2; although, there are discrepancies between Section B-1-IV-A.1 and Table B-1-2. For example, the ARC and RADEF, which have assignments, are not included in the Table.	I	Table B-1-2 has been revised to justify it and the agencies in Plan Section B-1-IV-A.1.		<i>See II.A.1, p B-1-6, Vol 1 and Table B-1-2 Sec 3 appear to agree. However, Probation and not prosecution is listed on P. B-1-6. Table B-1-2 indicates the prosecutor has the lead for law enforcement. The discrepancy should be resolved.</i>	A	I
A.2.b	The legal basis for the authorities outlined in the Plan are contained in Section B-1-I-A, page 13-1-1.	A					
A.3	The Annex B plan, Appendix 1 (Section III.A.5) refers to existing memoranda and agreements for Federal, State, County, Municipal and private agencies. Attachment 3 of Annex B lists some of these memoranda, but appears to be incomplete. The memoranda provided do not address all organizations having a support role in an emergency response within the plume exposure EPZ for Oyster Creek.  The following agreements with local emergency response organizations have been included in materials submitted by the State. However, as noted below, since some of these agreements are not dated, it cannot be determined when these agreements went into effect.	I	The State and County OEM's have obtained 59 of the 95 local MOU's designated since the original submission of 19 MOU's. The State and County will continue their efforts to obtain all required MOU's.	A	<i>The 59 MOU's checked were from first dept's and first aid squads. No MOU's could be located from the ARC, USCG, BNL, N.J. Transit, Bets, etc. Companies etc. Of the MOU's submitted, none were dated but most showed a date of receipt stamp for '85 and '86. One stated they accepted the responsibility but lacked the equipment. See C.4 for further comment.</i>	A	I

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NRC AI *Complete* 09/08/86

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A.3 Cont'd	<p><u>Municipal</u></p> <ul style="list-style-type: none"> <li>Long Beach and Barnegat Light - 1/1/80</li> <li>Agreement between Harvey Cedars, Long Beach, Ocean, Ship Bottom, Stafford, and Surf City - 10/9/79</li> <li>South Toms River and NJDSP - 1/1/78</li> </ul> <p><u>Schools/Shelters</u></p> <ul style="list-style-type: none"> <li>Ocean County Board of Ch- Freeholders Resolution dated 4/7/82</li> <li>Brick Twp. School System and Ocean County - 4/7/82</li> <li>Jackson Twp. School System and Ocean County - 4/7/82</li> <li>Lakewood Twp. School System and Ocean County - 4/7/82</li> <li>Little Egg Harbor Twp. Ele- mentary School and Ocean County - 7/27/82</li> </ul>						



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A.3 Cont'd	<ul style="list-style-type: none"> <li>• Manchester High School and Ocean County - 6/18/82</li> <li>• New Egypt School, Plumsted Twp. and Ocean County - 4/7/82</li> <li>• Pinelands Regional School System and Ocean County - 6/30/82</li> <li>• Point Pleasant Borough Public School System and Ocean County - 4/7/82</li> <li>• Tuckerton Elementary School and Ocean County - 4/7/82</li> <li>• Georgian Court College and Ocean County - 12/21/82</li> <li>• Ocean County College and NJOEM - 6/1/84</li> <li>• Stockton State College and NJOEM - 2/19/85</li> </ul> <p><u>Fire Companies and First Aid Squads</u></p> <p>The letters of agreement with local fire companies and first aid squads are incomplete. Letters with 12 fire companies and 7 first aid squads have been received in</p>						



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NRC AI *Chapman* *Sept 86*

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
A.3 Cont'd	<p>materials submitted by the State to cover Oyster Creek. A total of 95 agreements is currently being sought by the County.</p> <ul style="list-style-type: none"> <li>• Lakehurst Fire Department and NJOEM - UNDATED</li> <li>• Stafford Twp Fire Company and NJOEM - UNDATED</li> <li>• East Dover First Aid Rescue Squad and NJOEM - UNDATED</li> <li>• Ocean Gate First Aid and NJOEM - UNDATED</li> </ul> <p>The necessary letters of agreements should be obtained from all of the local emergency response organizations and listed in Attachment 3 to the Annex B plan.</p>						
A.4	<p>Section B-1-IV specifies each principal organization will be capable of 24-hour operations.</p>	A					

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NRC RI Comments 9 Sept 86

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
C.	<u>Emergency Response Support and Resources</u>						
C.1.c	Attachment 17 of the State Plan and Attachment 12 of Annex B identify resources that will be available to support a Federal response.	A					
C.2.a	Section B-I-III-B.2 indicates the county may dispatch a representative to the EOF.	A					
C.4	See A.3 above.	I	See A.3 comment.				
D.	<u>Emergency Classification System</u>						
D.3	Section B-II-D establishes an emergency classification system consistent with that established by the utility.	A					
D.4	Emergency actions to be taken are consistent with the emergency actions recommended by the nuclear facility licensee. In Section B-I-III-F.3, page B-1-10, it indicates that the OCNCS Emergency Director will establish liaison with the State OEM, which will coordinate the off-site emergency response in accordance with the OCNCS Site Emergency Plan and the NJ State RERP. It also states that the County EMC, based on orders received from	A			C.4 goes beyond fire and rescue services. OEM states the MOU completion is incomplete. The utility in ATT.3 appears complete but no date and type of agreement are shown. Some MOU related portion public service and not OPU nuclear aspects of Oyster Creek. Some of them relate to licensee's support and not off-site support. Refs to A.3 for additional comment.	A	I

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NRC RI *CFR 20.110* *Sept 86*

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D.4 Cont'd	the Governor through the NJ State OEM, will direct County Emergency Operations.						
E.	<u>Notification Methods and Procedures</u>						
E.1	Mutually agreeable bases for notification of response organization consistent with the emergency classification and action level scheme is provided for in Section B-1-III-F.1, page B-1-8.	A					
E.2	Procedures for alerting, notifying and mobilizing response personnel for all organizations are contained in Section B-1-IV-A.1 and the Implementing Procedures; however, Section A.1 (Notification & Communication) of the Implementing Procedures for Sheriff's Dept. indicates that the Sheriff's Dept. will be notified by a telephone call from the County EOC during working hours. Section B-1-IV-A.1.1 of the Plan indicates that the Sheriff's Communication Division will be notified by telephone or teletype from the State OEM and by dedicated telephone from OCNGS. The implementing procedure should be consistent with the Plan.	I	The plan has been revised to include the Ocean County Office of Emergency Management OCOEM as one of the organizations who may be notifying the County Sheriff's Communications Division.		<i>A.1.1 on p. B-1-16 has been revised as stated</i>	A	A



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NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
E.2 Cont'd	Section B-1-IV-A.1.1 (pg. B-1-16) designates the OCSCD as the agency to make all notification calls.				<i>A.1.1 p B-1-16 has been edited as noted. This is Rev 3, see preceding page)</i>	#	#
	The paging system is discussed in Section B-1-V-A.1.1 (see page B-1-17).						
E.5	The Emergency Broadcast System has been established as the means of disseminating information to the public, in Section B-III-D.2.  In the event of a radiological emergency at the Oyster Creek Nuclear Generating Station, EBS may be activated by telephone notification to WADB-FM. The State OEM is responsible for developing and disseminating information in the initial and followup messages to the public.	A					
E.6	Sections B-III-D.1 and B-1-III-D state that a system of sirens will be used to notify the public of an emergency within 15 minutes. This system will be activated by the County EMC. The location of a list of tone alert radios is also stated.	A					

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NAL AI C94 n64 Sept 86

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
E.7	Attachment 14 of Annex B contains sample written message for the public giving instructions for protective actions based upon the licensee's classification scheme.	A					
F.	<u>Emergency Communications</u>						
F.1.a	The Annex B plan contains provisions for 24-hour coverage of communication links as well as primary and backup communications between emergency facilities. Refer to B-III-F.1, B-1-III.F, B-1-IV-A.1, Table B-1-1, and Figures B-1-1.	A					
F.1.b	Provisions for communications with the State and contiguous local governments within the Emergency Planning Zone are described in Tables B-1-1 and B-1-11 contained in Annex B. <b>Figure B-1-4 should be replaced by Table B-1-11 in the cross reference.</b>	A	Figure B-1-4 has been replaced by Table B-1-11 in the cross reference.				
F.1.c	Refer to Annex B element F.1.b for communications with state. Section III.C.2 of the State plan defines communication with Federal response organizations as a State responsibility.	A					
F.1.d	Communication links between the Emergency Operations Facility, State EOC and local EOCs are documented in Tables B-1-1 and B-1-11 of Annex B. <b>However, these tables do not address communication with the County Field Monitoring Teams.</b>	I	Communications with the County Field Monitoring Team in SOP 204.				

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*NRC RI C24, p. 10 9-18-86*

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F.1.e	Refer to Annex B, Element E.2.	I	See E.2		<i>A.1.1 p B-1-16 &amp; 17 description meets the criterion</i>	A	A
F.2	The NUREG cross reference refers to the JEMS communication plan and the State Emergency Mass Casualty Care Plan. The JEMS plan provides an excellent discussion of a coordinated communication system. However, references to these documents could not be located in the Annex B plan.	I	The New Jersey Emergency Medical System (JEMS) Plan is referenced in the Plan on page B-III-18.		<i>P B-III-18 Rev 3 reference JEMS</i>	A	A
F.3	Provisions for periodic testing of the emergency communications system are described in Section B-1-V-B.2.1 of the Annex B plan. However, the frequency of siren EBS and tone alert radio tests could not be determined.	I	The frequency of siren, EBS and tone alert radio tests is provided in the plan on page B-1-25.		<i>Test frequency is stated in V. C.2.1 p B-1-25 and 26</i>	A	A
G.	<u>Public Education and Information</u>						
G.1.a	Sections B-III.E and B-1-III.E discuss in general terms a public information program; however, specific reference to the following required information is absent:  a. educational information on radiation;  b. contact for additional information;	I	The Plan has been revised to include references to educational information on radiation, additional sources of information, protective measures and radio protective drugs, starting on Page B-III-9.		<i>Rev 3, page B-III 9 &amp; B-III-12 does contain a description of the public information system</i>	A	A



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NRC RI *Complete* 9-1-86

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G.1.a-d Cont'd	c. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radioprotective drugs; and  d. special needs of the handicapped.	A					
G.2	Section B-III-E specifies that updated written material will be distributed at least annually to residents of the EPZ. In addition, information for the transient population is also discussed.	A					
G.3.a	Sections B-III-E, B-IV-B.2.1 and B-1-III-E designate the respective points of contact and location of the Emergency News Center for the media during an emergency. The ENC is 200 yards within the 10-mile EPZ and a back-up facility has not been designated. A backup facility should be designated unless the primary facility is considered acceptable by the NRC.  Plan Section B-IV-B.2.1 (p. B-IV.3) should clarify the parties involved in the release of public information announcements.	A	An alternate point of contact has been provided for in the plan see page B-IV-3. The release of information is outlined in the plan see page B-III-11		The criterion has been rated A. The reason for the state response is not evident nor more needed. The NRC does not impose legally binding requirements on host GOs licensed for News Centers. 10 CFR 50.47(b)(7), and G.3.a and G.3.b note identification in advance of principal points of contact. See F & APP E does not note news center		

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NRLRI *C. J. G. rate*

*Sept 1986*

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G.4.a	In Section B-III-E and B-1-III-E the County Public Information Officer under the direction of the Board of Chosen Freeholders is designated as the County spokesperson. The Governor's spokesperson, the Press Secretary, will be the State Public Information Officer.	A					
G.4.b	Section B-III-E establishes arrangements for timely exchange of information among designated spokesmen.	A					
G.4.c	Section B-III-E indicates the State will coordinate rumor control operations through a toll-free number. This is consistent with Section III-E of the State plan.	A					
G.5	In Section B-III-E the plan calls for annual meetings to acquaint the news media with the emergency plans and other pertinent information.	A					
H.	<u>Emergency Facilities and Equipment</u>						
H.3	The Emergency Operations Center for each organization is described in Section III.8.1 of the Appendices to Annex B. Figure B-IV-5 shows that the following	I	The County has allocated space at the Northern County Resource Center in Lakewood for Operations. The County Communications bus will provide all communications links needed. The Resource Center has adequate space to allow for municipal EOC's that may need to relocate. See page B-1-5.		<i>The point is satisfied - orally in B.1 &amp; B-1-5</i> <i>DWB</i>	A	A

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NRC AI *CM* *2/18/86*

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H.3 Cont'd	<p>EOCs are within the 10-mile EPZ: Ocean County, Barnegat Light, Barnegat, Beachwood, Berkeley, Harvey Cedars, Island Heights, Lacey, Ocean Twp., Ocean Gate, Pine Beach, South Toms River, and Stafford. Provisions for alternate EOCs should be described in the plan. Evacuation procedures for workers in EOCs are also needed.</p> <p>In addition, Section B-1-III-B.1 states that a bus will be used as the alternate County EOC. It appears doubtful that a single bus can accommodate the operations of a County EOC.</p>						
H.4	Section B-1-III-F.1 provides for the timely activation and staffing of emergency facilities.	A					
H.7	Specific reference to SOP-402 has not been included in the Annex A plan. The total count for each type of equipment should be provided so that it can be determined whether the available equipment is sufficient to cover the number of teams. This equipment is critical, since the State plan specifies (page IV-29) that the County field teams will provide data prior to the arrival of the DEP teams.	I	Equipment for the county monitoring team is identified in Attachment 18 of the State Plan page 6.		ATT 18 is an excellent lesson plan which contains no equipment list. Table B-1-9 Rev 1 Vol 1 lists County rad equipment. The inventory appears adequate to support the monitoring teams	A	A



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NAC RI (C) 7-11-86

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
H.10	Section B-1-V-C indicates the frequency of inspection, inventory and operational checks of emergency equipment and instruments. This section also addresses the supply of reserves to replace those removed for calibration and repair. However, it should be clarified specifically who is responsible for the inspection and inventory.	I	The Plan has been revised to identify the State RADEF Officer as being responsible for inventory and inspection of equipment. See B-1-27.		V.C. of B-1-27 Rev 3 addresses calibration but not inventory. Also see A.3.6 of B-1-2 Rev 3	I	I
H.11	Attachment 14 of the State Plan (not 18 as shown in the 0654 cross reference) lists communication networks which are available. Equipment available to DEP, other State, and county personnel is shown in SOP 402; however, the SOP has not been referenced.  Section B-1-IV-A.3.7 consists of a list of equipment. No indication is given as to how this equipment is deployed, e.g., monitoring kits; decon kits, etc., or where the equipment is stored.	I	The Plan has been revised to reference SOP 402 under the County Radiological Defense Service, Accident Assessment on page B-1-21. Equipment is identified in Attachment 18 of the State Plan on page 6.		See H.10 above for comment re location of inventory in the plan ATT-18 is referenced in A.3.7 (see above) but does not contain the specified information. The correct location should be specified.	I	I
H.12	Section B-1-IV-A.3.2 (page B-1-21) states that the County Radiological Defense Coordinator will forward all radiological data to the State RRP at Headquarters or the Forward Command Post.	A					

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*NRC A.I. C24 memo 9 Sept 86*

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I.	<u>Accident Assessment</u>						
I.7	The equipment shown in Attachment 2 to SOP 402 indicates that the county monitoring team has the capability to monitor ambient radiation levels and to determine the airborne iodine concentration in the presence of noble gas. Page B-1-21 indicates the County will deploy a field monitoring team. However, SOP 402 is not referenced.	I	The SOP 402 has been reference in the plan in Section B-1-IV-A.3.2, on page B-1-21.		<i>A.3.2 &amp; B-1-21 Rev 3 reference SOP 402</i>	A	A
I.8	Section B.-1-IV-A.3.2 does not address the issues of activation, notification means, field team composition, monitoring equipment, and estimated deployment times for county teams.	I	Activation, deployment and composition of the County Field Monitoring Team is identified in SOP 204.		<i>SOP-204 Rev 2 Aug '85 addressed these points</i>	A	A
J.	<u>Protective Response</u>						
J.2	Information on evacuation routes and provisions for transportation for on-site individuals are contained in Attachment 15, Element A, Appendix I to the Annex B plan.	A					
J.9	Section B-II-B references the FDA PAGs with appropriate table duplicated. There is, however, one error in Table B-II-2, Response Level for Preventive PAG. On	I	The Table B-II-2 has been revised to reflect the correct value.		<i>The 51-96 value has been corrected (Table B-II-2, p 1 of 6 Rev 2, Nov 85) Footnote (6) to Table B II-3 p 1 of 1 Rev 2 addresses PAG for pregnant females and for (7) the concept of informed</i>	A	A

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J.9 Cont'd	Table B-II-2 the value for the initial deposition for Sr-90 should be 0.5 uCi/m <sup>2</sup> rather than 0.05 uCi/m <sup>2</sup> . The PAGs for emergency workers should be revised to include two additional items: (1) pregnant emergency workers are subject to the PAGs for the general public only, and not those for emergency workers; (2) any excessive exposure be done on a voluntary basis with full knowledge of the potential risks involved. These changes should be included in the text and tables which discuss Emergency Worker PAGs. Tables B-II-1, 2, & 3 should be added to the cross reference.		voluntary consent is noted. ALARA is introduced. 10 C.F.R. 50.36(a) is the basis for ALARA addressed in detail in Appendix I to 10 C.F.R. 50. ALARA applies to planned or operating conditions and not emergencies. Substitution of the phrase "dose minimization techniques" for "the ALARA concept" should be considered. The Figure 15.12 has been replaced.				
J.10.a	Maps showing evacuation routes, evacuation areas, and relocation centers are included in Attachment 15. However, Figure 15.12 is illegible. It is recommended that a larger scale map be referenced with the next plan revision. Also, please provide final evacuation bus routes corresponding to Figure 15.13 under separate cover.  Maps indicating radiological sampling and monitoring points are included in Attachment 5.	I	A reasonably legible Fig 15.12 is included in ATT 15 bearing no date or no number.  ATT 5 lists sampling and monitoring points		ATT 5 lists sampling and monitoring points	A	A



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J.10.b	Maps showing population distribution around the nuclear facility are included in Figure B-IV-3, Figure B-IV-4 and Figures 15.3 and 15.4 of Attachment 15.	A					
J.10.c	Sections B-II-D and B-I-III-D discuss the various means of notifying the public. This is consistent with the State Plan. However, neither plan presents specifics regarding route alerting and the distribution of tone alert radios. Refer to the evaluation of element J.10.d for the State Plan.	I	Route Alerting Plans are maintained as supporting documents by the local EMC's. Copies are provided. The route alert plans and source of tone alert radios are referenced on page B-III-7.		<i>Copies of route alerting maps noted in B-III-7 &amp; Rev 3 were provided and checked. They are acceptable</i>	A	A
J.10.d	The adequacy of resources for the transportation of mobility impaired persons identified in the Annex B plan could not be evaluated because the number of institutionalized and noninstitutionalized individuals who may require transportation could not be located. In addition, the plan does not disclose where lists of mobility impaired individuals are maintained.	I	The number of non-institutionalized non-ambulatory persons is provided in the Special Care Facilities Plan on Table 15.B.6. This list is derived from the annual public information mailing.		<i>9 Table 15. B.6 could not be located. However, Table 15-G-8 Rev 2 P 15(A) G-43 &amp; ATT 15 appear to provide the information. The State should confirm that G-8 is the table or if it is not locate B.6</i>	A	I

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J.10.e	<p>A plan for the distribution of KI to emergency workers signed by the Commissioner of Health and dated 8/29/85 has been received. It covers quantities, storage, locations and distribution to emergency workers. PAG for thyroid is 25 rem.</p> <p>In addition, Section II.B.3 of Annex B references the use of KI. A projected dose of 25 rem to the thyroid will be the trigger point for KI use by emergency workers. This is consistent with the Potassium Iodide Distribution Plan, N.J. Dept. of Health.</p> <p>However, Section B.II.3 should be added to the cross reference and reference to the Potassium Iodide Distribution Plan should be added to this section.</p>	I	Section B-II-3 has been added to the cross reference. The Potassium Iodide Distribution Plan has been added to B-II-3 on page B-II-7.		<p>reference to the KI Distribution Plan has been added to B.3 on P. B-II-7 plus and not the plan. Not as spread made to the location of the KI plan. X</p>	A	A
J.10.f	<p>Figure A-III-8 shows the decision mechanism regarding the administration of KI. Also, the Potassium Iodide Distribution Plan, indicated in the cross-reference listing, provides the decision mechanism for the administration of KI to emergency workers and institutionalized populations. However, reference to the KI plan should be included in Section II.B.3 of Annex B.</p>	I	<p>The Potassium Iodide Distribution Plan has been added to Section B-II-3 of the plan on page B-II-7.</p>		<p>see J.10.e above</p>	A	A

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J.10.g	<p>Local resources for evacuation and relocation are identified in Appendix C to Element A of Attachment 15 to the Annex B plan. Estimates of the institutionalized and general transit dependent populations are contained in Element A and B of Attachment 15.</p> <p>The Marine Evacuation Plan page 15(d)-1 to 15(d)-20 covers Barnegat Bay Clearance and Marine Evacuation. It describes in detail the role of the New Jersey Marine Law Enforcement Bureau (MLEB) the U.S. Coast Guard, and the New Jersey State Police.</p> <p>Page 20 of the Ocean County School Evacuation Plan does not include the Southern Region 4 buses for Southern Regional High School and Stafford Townships. This should be added.</p>	A	<p>The four buses from Southern Regional have been added to the Plan.</p>				
J.10.h	<p>Appendix D of Element A to Attachment 15 to the Annex B plan lists 32 Congregate Care Shelters, with a total capacity of 26,510. Figure 15.10 of Attachment 15 shows that all of the shelters are at least 5 miles beyond the EPZ and that 13 of the shelters are 10 miles beyond the EPZ.</p>	A					



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J.10.i	Projected traffic capacities are presented in Table 15-G-7, pages 15-G-37 to 15-G-42, of the Evacuation Plan, Attachment 15.	A					
J.10.j	Organizational responsibilities for access control are presented in Section A.4.1.11 and Appendix B to Attachment 15. Access control points are shown on Figure 15.9 of Attachment 15.	I	The USCG has been added to the Plan as a responsible agency for Marine Access Control.		The USCG has been added; see Appendix B to Element A of ATT 15 p 15(A)-B-1 Rev 2.0	A	A
J.10.k	Marine Access control is discussed in Element D of Attachment 15. However, Section A.4.1.11 of Element A should be revised to include the USCG as a responsible agency for marine access control.  Section A.3.VI of Appendix A to Element A of Attachment 15 (p. 15-(A)-A-2) states tow trucks and public works vehicles will be dispatched to disabled vehicles and alternate evacuation routes will be established if necessary. However, information on resources available to remove impediments to evacuation and their location was not found in Attachment 15.	I	The number of public works vehicles is identified in the plan table.		ATT 15, AOP A, see A.3.V p 15(A)-A-2 Rev 2 and see A.6 p 15(A)-A-3 Rev 2 address this point. The table number listing the number of public works vehicles was not given and could not be located in the attachment	A	I

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J.10.1	Evacuation time estimates are provided in Appendix G of Element A of Attachment 15. However, the following schools, listed in Element C — Ocean County Office of Education Emergency Response Plan — were not included in Table 15-G-10-A (p. 15-G-54): Lavallette, Toms River Alternate School, Seaside Park School and Seaside Heights.	I			<i>state response not given.</i>	I	I
J.12	Section B-1-III-F.5 of Appendix 1 states that sufficient personnel and equipment to monitor all evacuees within 12 hours will be provided by local government with the support of the State OEM. Specific resources excluding numbers of instruments and personnel are found in SOP 402, Att. 402-2.	A					
K.	<u>Radiological Exposure Control</u>						
K.3.a	Procedures for determining dose exposure to emergency workers is specified in Section B-1-III-F.5 and in State SOPs 401 and 405.  There are provisions, in SOP 405, to evaluate the permanent record dosimeters when the accumulated dose of 1.25 rem is indicated by self-reading dosimeters.	A					

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K.3.a Cont'd	The inventory of dosimetry in Attachment 1 of SOP 402-1 provides for a pair of self-reading (0-200 mR and 0-20 R) dosimeters and a TLD for approximately 1725 county workers.						
K.3.b	<p>This Attachment also lists permanent record dosimeters as equipment issued to all DEP response personnel.</p> <p>SOPs 401, 405, and 408 provide that the pocket dosimeters shall be read and the readings recorded at intervals no greater than 30 minutes. BRP is assigned the responsibility for maintaining dose records of all emergency workers and for evaluating the need for further dose commitment evaluation by whole body counting.</p> <p>SOP 405 should refer to SOP 402 when a dosimeter reaches the authorized limit.</p> <p>Section B-1-III-F.5 of Annex B should be consistent with the SOPs and on page B-1-12 indicate that dosimeter will be read at intervals no greater than 30 minutes and not "dosimeter will be read frequently."</p>	A	<p>The time interval for reading dosimeters has been established in the plan at 30 minutes on page B-1-12. The SOP 405 has been revised to refer to SOP 402 when the dosimeter reaches the authorized limit.</p>				



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K.6	<p>Section III.F.5 of Annex B and the applicable SOPs should be revised to specify that DOH is responsible for approving emergency worker exposure in excess of general public PACs. (Note - page B-III-17 states "upon recommendation from BRP, the DOH will authorize the use of KI.")</p> <p>Figure B-III-8 indicates that governor's designee may authorize higher limits.</p> <p>The ALARA concept is discussed in the State plan (Sec. II-B.1, p. II-5). The ALARA concept should also be cited in the Oyster Creek site-specific plan (see B-II-B, p. B-II-b and Table B-II-1).</p>	I	<p>The Plan has been revised to specify that the DOH is responsible for approving emergency worker exposure. See page B-III-19. The ALARA concept cited in the Plan. See pages B-II-5, B-II-6 and B-II-8.</p>		<p>II. B. 1, p. B-II-6-7 Rev 3 note. Common DOH approval and for (6), (7) to Table B-II-3 p. 1 of Rev 2 and Comments to J. 9 above.</p>	A	A
K.5.a	<p>The action level in SOP 404 has been reduced to 50 cpm for the instruments specified. The trigger point for the need for decontamination of emergency workers is specified in SOP 406 along with the instrumentation for which this trigger point is applicable.</p>	A					

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K.5.b	<p>SOP 401 provides that a Radiological Monitoring Technician will do relevant monitoring and gives radiological equipment at decon centers. Also, the inventory of radiological equipment is adequate.</p> <p>SOP 401 describes the monitoring and decontamination facility operation, SOP 404 gives procedures for monitoring and decontamination of the general public and SOP 406 gives procedures for monitoring and decontamination of emergency workers and equipment.</p> <p>However, NUREG element K.5.b and applicable plan and SOP references is not included in the cross reference.</p>	A	NUREG Element K.5.6 has been added to the cross reference.				
L.	<u>Medical and Public Health Support</u>						
L.1	<p>See comments in review of State Plan. Also, the cross reference lists Attachment 7 which is no longer consistent with Attachment 9 of the State Plan. A primary and back-up hospital should be designated for Oyster Creek NGS.</p>	I	<p>A primary Hospital, Community Memorial Hospital and back-up Hospital Bridgeton Hospital have been designated for Ocean County.</p>		<p>ATT 7 Rev 3 B, p 7-1 and 7-2 list the Community Memorial Hospital as the primary hospital and the Bridgeton Hospital as the secondary hospital. No relation between ATT 7 and ATT 9 could be identified</p>	A	A

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L.4	The Emergency Mass Casualty Care Plan has been referenced in Section B-1-III-F.5. The JEMS Plan should be included in the cross reference.	A	The JEMS Plan has been added to the cross reference.				
M.	<u>Recovery and Reentry Planning and Post-Accident Operations</u>						
M.1	Sections B-III-F.5 and B-1-III-F.5 describe the decision process and general plan for recovery and reentry. Sections B-1-III-F.3 and B-III-F.3 provide for the coordination of State and County response.	A					
N.	<u>Exercises and Drills</u>						
N.1.a	Adequate provisions have been included in Section B-1-V-B.3 of Appendix 1 to assure that exercises are conducted in accordance with NUREG-0654.	A					
N.1.b	Sections B-1-V-B.3 and B-1-V-B.3.1 provide that the exercise scenario will test the capability to mobilize resources.	A					



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N.2.a	Section B-1-V-B.2.1 provides for an annual test of communications between OCNGS, the State, County and municipal EOCs. Communication drills will also test the accurate transmission of the message content.	A					
N.2.c	Section B-1-V-B.2.2 of Appendix 1 adequately describes provisions for Medical Emergency Drills.	A					
N.2.d	Section B-1-V-B.2.3 states that the BRP is responsible for conducting radiological monitoring drills.	A					
N.3.a	Section B-1-V-B.1 states the scenario will include the basic objectives for each exercise on drill and evaluation criteria.	A					
N.3.b	Section B-1-V-B.1 states the scenario for each exercise or drill will include the date(s), time period, place(s) and participating organization.	A					
N.3.c	Section B-1-V-B.1 states the scenario for each exercise will include a time schedule of real and simulated events.	A					

NUREG-0654 Element	RAC Comments/Recommendation	Adequate (A) Inadequate (I)	State Response (Action)	Projected Date of Completion	RAC Evaluation of State Response	Response Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
N.3.d	Section B-1-V-B.1 states the scenario for each exercise will include a time schedule of real and simulated events.	A					
N.3.e	Section B-1-V-B.1 states the scenario for each exercise will include a narrative summary describing the activities to be performed.	A					
N.3.f	Section B-1-V-B.1 states the scenario and narrative will be distributed to official observers prior to the exercise.	A					
N.4	Section B-1-V-B.3.1 provides for observation, evaluation and critiquing of the annual exercises.	A					
N.5	Section B-1-V-B.3.1 and B-1-V-E provides for review and updating of plan reflecting changes suggested by the exercise critique. This section also assures that the revision are received and posted.	A					
O.	<u>Radiological Emergency Response Training</u>						
O.1	Section B-1-V-A provides for training for appropriate individuals involved in emergency response planning and those who may be called upon to assist during an emergency.	A					

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0.1.b	Section B-1-V-A specifies that where MOUs exist between local agencies, the training will be offered to other departments which are members of the mutual aid districts.	A					
0.4.a-d, f-j	Training programs have been provided in Attachment 18 and Section B-1-V-A provides for the periodic retraining of emergency response personnel. <b>Attachment 18 should be added to the cross reference.</b>	A	Attachment 18 has been added to the cross reference.				
0.5	Section B-1-V-A provides for the periodic retraining (at least once annually) of emergency response personnel.	A					
P.	<u>Responsibility for the Planning Effort:</u> <u>Development, Periodic Review and</u> <u>Distribution of Emergency Plans</u>						
P.1	Section B-1-V-A states that the State OEM is responsible for training of county and municipal emergency response planners.	A					
P.2	Plan maintenance responsibility rests with the County EMC (see pages B-1-20 and B-1-26).	A					



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						Adequate (A) Inadequate (I)	Plan Revision Adequate (A) Inadequate (I)
P.3	Responsibility is assigned to the County EMC (see Secs. B-1-III-A.1 and B-1-V-E at pages B-1-4 and B-1-26, respectively). As the individual responsible for updating emergency plans and coordinating these plans with municipal EMCs.	A			APP 1, Sec V.E. p. B-1-27 Rev 3		
P.4	Section B-1-V-E states that the annual review and updating of emergency plans will reflect changes suggested by the exercise critique. These revisions will be certified that they have been received and posted.	A					
P.5	Approved changes to the plan will be distributed by the State and County OEM. However, there is no indication that the revised pages will be dated and marked to show where changes have been made.	I	The plan has been change to identify revised pages with dates and indicators.		APP 1, Sec V.E. p. B-1-27 Rev 3 addresses the point	A	A
P.6	Attachment 2 is a listing of supporting plans and thier source.	A	The Title of Attachment 19 has been changed to Standard Operating Procedures Cross Reference.		The title has been changed as stated	A	A
P.7	The cross reference listing the procedures by title and the associated plan reference has been received from OEM via letter dated August 21, 1985. This list has been referenced as Attachment 19 to Annex B. However, for clarification, the title of	I					

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P.7 Cont'd	Attachment 19 should be "Standard Operating Procedures Cross Reference" and not "Implementing Procedures Cross Reference" as the procedure titles refer to the State SOPs and not the County Implementing Procedures.  The revised OCEERP has been included as element C to Attachment 15.						
P.8	Annex B contains a table of contents and a cross reference. However, the cross reference has errors and should be reviewed and revised.	I	The revised cross reference is attached.		<i>Rev 3 of the cross reference is not included in the plan. When used, no errors were noted</i>	A	A
P.10	There is no indication in Section B-1-V-E that telephone numbers will be reviewed and updated on at least a quarterly basis.	I	The plan has been revised to indicate that telephone numbers will be updated at least quarterly.		<i>APP1, Sec V.E. of B-1-24 Rev 3 state phone numbers will be checked quarterly and revisions made</i>	A	A