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BECo Ltr.#87-148

U.S. Nuclear Regulatory Commission
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Washington, D.C. 20555

Docket 50-293
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SUBJECT: Boston Edison Company Action
Plan and Schedule for Providing
Assistance in Addressing FEMA Issues

Dear Sir:

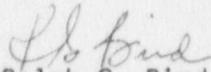
As requested by Mr. Varga's letter of August 18, 1987, transmitting a copy of the FEMA report entitled "Self Initiated Review and Interim Finding of the Pilgrim Nuclear Power Station", we are enclosing an action plan and schedule for assisting the Commonwealth of Massachusetts and local governments in addressing the FEMA identified emergency planning issues for Pilgrim Nuclear Power Station. The Commonwealth has reviewed and concurs with our assessments as presented in the action plan and schedule.

The enclosed action plan and schedule identifies various "subissues" derived from the FEMA report and sets forth the current status, the planned assistance to be provided by Boston Edison to the Commonwealth and local governments, the target schedules for resolution, and as necessary, an explanatory comment. As explained more fully in the introduction, the action plan and schedule is part of a comprehensive program of assistance by Boston Edison to the Commonwealth and local governments in upgrading the offsite emergency response programs relating to the Pilgrim Nuclear Power Station.

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Please do not hesitate to contact either myself or Mr. Ron Varley at (617) 747-8544 if any additional information is required.


Ralph G. Bird

RGB/dlw
Enclosure

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BOSTON EDISON COMPANY
ACTION PLAN AND SCHEDULE FOR PROVIDING
ASSISTANCE IN ADDRESSING FEMA ISSUES

Introduction

In a letter dated August 18, 1987 the Nuclear Regulatory Commission (NRC) transmitted to Boston Edison Company (BECo) a copy of the Federal Emergency Management Agency (FEMA) report entitled "Self-Initiated Review and Interim Finding for the Pilgrim Nuclear Power Station" (August 4, 1987) (FEMA Report). It requested that BECo provide to the NRC "an action plan and schedule for assisting the State and local governments in addressing the FEMA identified emergency planning issues for Pilgrim."

To prepare this action plan and schedule, BECo first reviewed the FEMA Report to identify the precise issues raised by FEMA. This task was simplified by the fact that in Section III of the FEMA Report ("Evaluation of Issues"), FEMA identified six major issues (A through F) and under each issue stated its current position, including in most instances, the information required to resolve its concerns. Using those statements by FEMA, BECo has identified a number of "subissues" that, we believe, collectively comprise the concerns raised by FEMA.

Under each subissue, BECo has set forth the current status, the planned BECo assistance to the Commonwealth of Massachusetts (Commonwealth) and local governments, the anticipated schedule for such assistance, and, as necessary, an explanatory comment.

The action plan and schedule set forth below is part of a comprehensive program of assistance by BECo to the Commonwealth and local governments in upgrading the offsite emergency response programs relating to the Pilgrim Nuclear Power Station (Pilgrim). Well over a year ago, BECo began developing information which would be useful in the enhancement of the offsite programs. This effort has resulted in, among other things, the "Pilgrim Station Evacuation Time Estimates and Traffic Management Plan Update" (August 18, 1987) (ETE) prepared by KLD Associates, Inc. and "A Study to Identify Potential Shelters in the EPZ Coastline Region of Pilgrim Nuclear Power Station" (August 1987) (Shelter Study) prepared by Stone & Webster Engineering Corporation, as well as information generated in surveys to identify the special needs and transportation dependent populations within the EPZ. Much of this information is relevant to the concerns raised by FEMA and will be useful in the resolution of such concerns.¹¹ Thus, as reflected in the action plan and schedule, the remaining task is primarily to incorporate such information into enhanced offsite programs.

¹¹ Some preliminary information regarding the enhancement of the offsite programs was submitted in letters from BECo to the NRC dated June 4, 1987 and June 12, 1987, and from BECo to the Commonwealth dated June 30, 1987. To the extent that such information has not been superseded in the ongoing planning process, it will also be useful. One item in such correspondence involved the possible use of the Edgar Station as a third reception center, which is no longer under consideration.

It is also significant that, even prior to the issuance of the FEMA Report, BECo, the Commonwealth and the local governments developed a sequence of actions for the upgrading of the Pilgrim related offsite emergency response programs, and are cooperating in the accomplishment of the following actions:

- (1) Revision of the emergency plans of the towns within the EPZ, the reception center communities, and the Massachusetts Civil Defense Agency (MCDA) Area II;
- (2) Revision of the associated procedures of the local governments and MCDA Area II;
- (3) Conforming revisions of the Commonwealth's state-wide emergency plan and procedures;
- (4) Development and implementation of training programs for officials and emergency personnel; and
- (5) Renovation of the Emergency Operation Centers (EOCs) in each of the towns within the EPZ and the reception center communities.

BECo has provided and is continuing to provide assistance to the local governments and the Commonwealth in these efforts in accordance with the Massachusetts Civil Defense Act of 1950 (Chapter 639, Section 15, Acts of 1950 as amended). For example, BECo has provided two professional planners to work under the direction of the officials of each town in upgrading its plan,

procedures and training, and one professional planner to assist each reception center community. BECo and the Commonwealth have also developed an arrangement under which four professional planners are being provided to work under the direction of MCDA in the upgrading of the MCDA Area II and Commonwealth programs. This cooperative effort is further illustrated by the fact that the professional planners are presently completing training modules on "Emergency Plan Overview" and "Introduction to Radiation", subject to MCDA's review, and additional task-based modules will be prepared for training of specific categories of emergency personnel. The planners who are currently involved in assisting the towns and MCDA Area II in developing revised plans and procedures will also participate in implementing the training program. Moreover, agreements are being executed with each of the five towns within the EPZ as well as the two reception center communities for assistance in the renovation of their EOCs. In addition, four of the five EPZ towns and both reception center communities, to date, have accepted BECo's offer to fund full-time civil defense staff positions.

The availability of much of the required information and the steps already taken, including the retention of experienced professional planners, have enabled BECo to estimate target schedules for completion of these efforts. The major efforts are now directed toward the offsite plans that are the fundamental source of the FEMA issues -- the town and MCDA Area II plans. The goal for completing revisions of the town and MCDA Area II plans is about October 31, 1987. The associated operational procedures should be completed by about December 15, 1987, and the Commonwealth has stated that revisions of the state-wide plan necessitated by the revisions of the town and MCDA Area II plans should be completed by the end of 1987. Renovation of each of the EOCs

will be performed individually, but all such renovations should be completed by April 30, 1988.

Thus, as discussed specifically below, the concerns raised by FEMA, which are encompassed within this overall program, are being addressed in a timely and comprehensive manner. Boston Edison and the Commonwealth are committed to working jointly to resolve all of FEMA's concerns and to establishing the best possible offsite emergency response program for the communities around Pilgrim Nuclear Power Station.

Issue A. Evacuation of Schools

Subissue A.1 (FEMA Report, page 15)

"The 1985 version of the town plans for Plymouth, Duxbury, Carver, Kingston, and Marshfield are inadequate in that they do not identify all private schools and daycare centers within the plume exposure emergency planning zone."

Current Status

Private schools and daycare centers within the plume exposure pathway emergency planning zone (EPZ) are identified in Figures 10-1 and 10-3 of the "Pilgrim Station Evacuation Time Estimates and Traffic Management Plan Update" (August 18 1987), (ETE) prepared by KLD Associates, Inc.

Planned BECo Assistance and Schedule

The list of schools and daycare centers associated with each town will be included in the respective town procedures, rather than in the plans. The goal for completing the anticipated revisions to the procedures is about December 15, 1987. Pending those revisions, the pertinent lists will be made available to each town prior to October 31, 1987.

BECo is providing professional planners who are working under the direction of MCDA and town officials in preparing the necessary revisions of the town and MCDA Area II procedures.

Subissue A.2 (FEMA Report, page 15)

"Detailed plans and procedures must be developed for these institutions, identifying sufficient resources and arranging for the availability of these resources to evacuate children and staff in the event of an accident at Pilgrim."

Current Status

BECo is providing professional planners who are working under the direction of town and MCDA officials in revising town and MCDA Area II plans and procedures, which will identify sufficient resources and arrange for the availability of those resources to evacuate private schools and daycare centers.

Planned BECo Assistance and Schedule

The goal for completing the plans is about October 31, 1987. The associated procedures should be completed by about December 15, 1987.

Comment

Arranging for transportation providers is discussed under Subissues A.3 - A.5.

Subissue A.3 (FEMA Report, page 15)

"The Commonwealth's current position is that it will not use the vast state controlled bus resources of the MBTA and that it can no longer rely on ad hoc planning, at least during a fast breaking accident. Detailed plans and procedures must, therefore, be developed for the early dismissal and evacuation of each community's schools and daycare centers."

Current Status

The updated ETE takes into consideration evacuation of all public and private schools, and daycare centers in the EPZ. The professional planners provided by BECo are assisting town and MCDA officials in developing plan and procedure revisions relating to these institutions.

At a meeting with FEMA, NRC and BECo on August 14, 1987, the Commonwealth made clear that, if required, it would use all available resources, including those of the MBTA. If in the current planning process it is determined that MBTA buses may be useful, detailed arrangements providing for the availability and use of MBTA resources will be included in town, MCDA Area II and Commonwealth plans and procedures.

Planned BECo Assistance and Schedule

The goal for completing revisions of town and MCDA Area II plans which will address early evacuation and/or early dismissal of schools and daycare centers (and the use of private or public transportation resources for such evacuation or dismissal) is about October 31, 1987. Revisions to the associated procedures should be completed by about December 15, 1987.

Comment

Although current programs may include early dismissal, it appears that early evacuation of schools and daycare centers could be a more appropriate precautionary response. Nevertheless, the planners provided by BECo will be assisting school, town, and MCDA officials, in accordance with the schedule described above, in developing revised plans and procedures that incorporate whichever precautionary response is selected in the planning process (i.e., early evacuation and/or early dismissal).

Subissue A.4 (FEMA Report, page 15)

"Letters of Agreement with transportation providers not under direct control must be obtained."

Current Status

As described under Subissue A.2, the planning efforts underway will identify the transportation resources available for evacuation of schools and daycare centers.

Planned BECo Assistance and Schedule

The planners provided by BECo will assist MCDA and town officials, as appropriate, in obtaining Letters of Agreement (LOA's) to formalize agreements with a sufficient number of transportation providers to provide for evacuation of schools and daycare centers.

Subissue A.5 (FEMA Report, page 15)

"Personnel designated to drive vehicles during an evacuation must also receive proper training as emergency workers."

Current Status

The professional planners provided by BECo are presently completing training modules on "Emergency Plan Overview" and "Introduction to Radiation," which will be promptly provided to MCDA for review.

Planned BECo Assistance and Schedule

Additional task based modules will be prepared for specific categories of emergency personnel, including bus drivers. The goal for completing the specific training module for bus drivers is shortly after completion of applicable procedures on or about December 15, 1987.

The professional planners provided by BECo to assist in the development of plans, procedures and training programs will be available to assist in implementation of the training programs.

Issue B. Reception Center

Subissue B.1 (FEMA Report, page 19)

"[A] new reception center must be found to replace Hanover."

Current Status

The planners provided by BECo, in concert with the reception center communities' Civil Defense Directors, are currently evaluating the feasibility of using two rather than three reception centers. The updated ETE analysis demonstrates that EPZ evacuation times will not be adversely affected by the use of two reception centers rather than three.

In conjunction with the above effort, the Commonwealth has indicated that it will continue in its attempt to identify a third reception center to accommodate persons evacuating to the north of Pilgrim Station in the event of an emergency.

Planned BECo Assistance and Schedule

BECo expects that the evaluation of the feasibility of using two reception centers will be completed by about October 1, 1987. Associated procedures should be completed by about December 15, 1987.

"[P]lans and procedures must be developed to register and monitor evacuees."

Current Status

The planners provided by BECo are assisting the reception center communities and MCDA officials in revising plans and procedures governing or related to reception center operations. Those revisions will include reception center monitoring and registration of evacuees.

Planned BECo Assistance and Schedule

The goal for completing the relevant reception center community plans is about October 31, 1987. Associated procedures should be completed by about December 15, 1987.

Issue C. Beach Population

Subissue C.1 (FEMA Report, page 26)

"FEMA and the RAC ... must receive the following additional information:

- (1) an updated geographical description of the beaches and their capacity;

Current Status

BECo has developed preliminary estimates of the expected maximum number of people on the public beaches within the EPZ.

Planned BECo Assistance and Schedule

BECo will verify the preliminary estimates of the expected maximum number of people on the beaches, and will develop an updated geographical description of the beaches by about October 1, 1987.

Subissue C.2 (FEMA Report, page 26)

"(2) a detailed analysis of the beach population, including the number of permanent and temporary residents and the number of day visitors, together with their geographical dispersion;

Current Status

The current planning process is based upon the assumption that sufficient sheltering capacity for permanent and temporary residents and day visitors on the beaches will be provided.

Planned BECo Assistance and Schedule

BECo will identify by about October 1, 1987 the geographical dispersion of the beach population for each of the public beaches in the EPZ.

Comment

Since the current planning process is proceeding on the basis that sufficient sheltering capacity will be found for the entire beach population, a breakdown of the number of permanent and temporary residents and day visitors is not presently being developed.

Subissue C.3 (FEMA Report, page 26)

"(3) an updated estimate of the length of time it would take to evacuate the beach population;

Current Status

The updated ETE (Tables 9-4 through 9-8) contains estimates of the length of time it would take to evacuate portions of the EPZ encompassing each of the beaches.

Planned BECo Assistance and Schedule

None.

Comment

As part of the effort to upgrade the offsite plans, including provisions for sheltering and/or evacuation of the beach population, BECo, town and MCDA officials are exploring the possibility of precautionary clearing of the beach population at the "Alert" classification stage in order to facilitate implementation of protective actions for this segment of the EPZ population.

Subissue C.4 (FEMA Report, pages 26-27)

"(4) a list of suitable buildings available for sheltering the beach population at each beach, including the capacities of these buildings and their distances from the beaches."

Current Status

"A Study to Identify Potential Shelters in the E.Z. Coastline Region of the Pilgrim Nuclear Power Station" (August 1987) (Shelter Study) has been performed by Stone & Webster Engineering Corporation to identify potential sheltering capabilities of, among other facilities, municipal and commercial buildings for emergency use by the beach population within the EPZ. The Shelter Study contains a preliminary list of potential shelters in each of the towns that contain beaches. From the preliminary information contained in the Shelter Study, Stone & Webster is identifying the specific locations and relative distances from the beaches of the identified shelters. In addition, a detailed effort is being undertaken in each of the towns to identify and incorporate into their planning program specific shelters that would be utilized for the beach population which will take into account their distances from the beaches.

Planned BECo Assistance and Schedule

BECo estimates that the additional Stone & Webster analysis will be completed by about October 1, 1987. The goal for identifying final shelter locations is about December 15, 1987.

Subissue C.5 (FEMA Report, page 27)

"If these buildings are not open to the public, the plans must clearly state how they will be made accessible and letters of agreement must be obtained as appropriate."

Current Status

Planners provided by BECo are assisting EPZ town officials in revising plans and procedures to identify how shelter facilities will be made accessible and how the beach population will be made aware of the location and availability of such shelters. The planning approach is to preferentially identify public facilities which will not require the execution of letters of agreement. Should an insufficient number of public facilities exist, then LOA's will be obtained to formalize agreements with private facilities.

Planned BECo Assistance and Schedule

The goal for completing the plans for the EPZ towns is about October 31, 1987. The associated procedures should be completed by about December 15, 1987.

Issue D. Special Needs Population

Subissue D.1 (FEMA Report, Page 35)

The information on mobility impaired persons "must include the updated, comprehensive procedures used to identify the mobility impaired, together with the program in place to periodically review and update all relevant information pertaining to them;

Current Status

A survey previously performed by BECo identified the general size and characteristics of the mobility impaired population in the EPZ.

Planned BECo Assistance and Schedule

The planners provided by BECo will be assisting town officials in identifying specific mobility impaired persons (including their locations, specific impairments, and needs) and in developing procedures for maintenance and periodic updating of relevant information pertaining to these individuals.

The goal is to identify specific mobility impaired persons by December 15, 1987 and to develop procedures for annually updating and revising this information by about March 15, 1988. BECo is committed to working with the responsible Commonwealth agencies to ensure the best possible program for addressing the needs of the mobility impaired population.

Subissue D.2 (FEMA Report, Page 35)

"The resources available to meet the needs of . . . this group;

Current Status

The planners provided by BECo are utilizing listings of ambulance resources in the State provided by the Commonwealth Department of Public Health/Emergency Medical Services and other sources to assist town and MCDA officials in identifying the specific transportation resources that are available to meet the needs of the mobility impaired population in the EPZ. The planners are also assisting town and MCDA officials in revising plans and procedures that will provide for the needs of the mobility impaired population.

Planned BECo Assistance and Schedule

The goal for incorporating information regarding available transportation resources into town and MCDA Area II plans is about October 31, 1987. Associated procedures should be revised by about December 15, 1987.

Subissue D.3 (FEMA Report, Page 35)

"Letters of Agreement for the use of these resources as appropriate."

Current Status

Transportation providers from which LOA's must be obtained are being identified as described in Subissue D.2.

Planned BECo Assistance and Schedule

The planners provided by BECo will assist town and MCDA officials, as appropriate, in obtaining LOA's to formalize agreements with a sufficient number of transportation providers to provide for evacuation of the mobility impaired population in the EPZ.

Issue E. Transportation Dependent Population

Subissue E.1 (FEMA Report, page 40)

"FEMA and the RAC...must receive detailed plans and procedures for protection of the transportation dependent population, including: estimates of the number of people involved,"

Current Status

Estimates of the number of transportation dependent persons in the EPZ are contained in Table 10-6 of the updated ETE. Planners provided by BECo are assisting town and MCDA officials in developing revised plans and procedures that will reflect these estimates and address protection of the transportation dependent population.

Planned BECo Assistance and Schedule

The goal for completing town and MCDA Area II plan revisions addressing the transportation dependent population is about October 31, 1987.

Associated procedures should be completed by about December 15, 1987.

Subissue E.2 (FEMA Report, page 40)

"[L]ists indicating the resources needed and identified,"

Current Status

Table 10-7 of the ETE identifies the estimated number of buses required to provide for the transportation dependent population. The professional planners provided by BECo are working with town and MCDA officials to verify the actual number of buses needed, and to identify those buses that will be available for emergency use.

Planned BECo Assistance and Schedule

The goal for incorporating information on needs and available resources in town and MCDA Area II plans is about October 31, 1987. Associated procedures should be revised by about December 15, 1987.

Subissue E.3 (FEMA Report, page 40)

"[A]ppropriate letters of agreement."

Current Status

As described under Subissues E.1 and E.2, the planning efforts underway will identify the transportation resources available for evacuation of transportation dependent persons.

Planned BECo Assistance and Schedule

Planners provided by BECo will assist town and MCDA officials, as appropriate, in obtaining LOA's to formalize agreements with a sufficient number of transportation providers to provide for evacuation of the transportation dependent population in the EPZ.

Issue F. Overall Lack of Progress in Planning and Apparent Diminution in
Emergency Preparedness

Subissue F.1 (FEMA Report, pages 43, 47)

"(1)[T]he Commonwealth has failed to correct the numerous problems noted in FEMA's review of its plans and during its exercises... including issues from:"

- (a) the 1981 Regional Assistance Committee (RAC) review;
- (b) the 1982 RAC review;
- (c) the March 3, 1982 Exercise;
- (d) the June 19, 1983 Exercise; and
- (e) the September 5, 1985 Exercise.

Current Status

BECo has reviewed the issues remaining open from the referenced RAC reviews (including those identified in FEMA's October 30, 1985 letter to the Commonwealth) and exercises, and believes that these issues can be resolved through the current effort to revise the relevant plans and procedures, through training on the applicable procedures and through the procurement or repair of equipment.

Planned BECo Assistance and Schedule

The goal for completing town and MCDA Area II plan revisions addressing the issues identified by FEMA (Issues A-F) is about October 31, 1987. BECo expects that the remaining issues identified in prior FEMA reviews will be addressed in the subsequent effort to revise the associated procedures and train emergency response personnel, and in the upgrading of the overall state of emergency preparedness.

Subissues F.2 - F.7 (FEMA Report, page 47)

"(2) [The Commonwealth] has not updated its plan, and so advised FEMA of its actions on an annual basis...; (3) it has not implemented State and local training...; (4) it has not pursued an adequate program of public education and information for the media...; (5) and it has not ... submitted to FEMA the required Annual Letters of Certification for calendar years 1985 and 1986. (6) In addition, representatives of the Commonwealth have indicated that the state and local plan is inadequate; and (7) they have been unable to answer numerous questions posed by the public and by local officials in public meetings ..."

Current Status

See Comment.

Planned BECo Assistance and Schedule

See Comment.

Comment

Subissues F.2 - F.7 relate primarily to relationships between FEMA and the Commonwealth or to alleged past events involving the Commonwealth.

Although it is inappropriate for BECo to address these matters, much of the information being developed and actions being taken under Issues A-E and Subissue F.1 are relevant to Subissues F.2 - F.7. In addition, should the Commonwealth desire any further assistance from BECo under the Massachusetts Civil Defense Act of 1950 (Chapter 639, Section 15, Acts of 1950 as amended), BECo will provide such assistance.

Subissue F.8 (FEMA Report, pages 47-48)

"[A]dditional areas of plan weakness are identified in the ... FEMA Report, 'Analysis of Emergency Preparedness Issues at Pilgrim Nuclear Power Station Raised in a Petition to the NRC Dated July 15, 1986.'"

Page 33 of the FEMA Report on the July 15, 1986 Petition states that the "Commonwealth's plan would be enhanced if the policy for the administration of KI to institutionalized people were clearly stated; and if procedures for the distribution of KI to the institutions were more fully developed."

Current Status

Supplies of KI have been made available by BECo and arrangements have been made to have a small supply in each of the towns in the EPZ under lock and key controlled by the local civil defense director. As noted in a memorandum dated August 10, 1987 from Robert Hallisey, Commonwealth Department of Public Health, Director, Radiation Control Program, to Gerald Parker, Commonwealth Department of Public Health, Assistant

Commissioner, Bureau of Environmental Health Services, it would be possible to address FEMA's concern by "spell[ing] out that the local civil defense director could transfer this supply to an institution within his/her community if needed."

BECo Planned Assistance and Schedule

If requested by the Commonwealth, the professional planners provided by BECo could assist in the revision of plans and procedures to clarify this policy.

Comment

BECo's review of the FEMA Report on the July 15, 1986 Petition indicates that the only "additional area of plan weakness" identified in that report which is not encompassed by Issues A-E and Subissues F.1-F.7 is FEMA's recommendation concerning the Commonwealth's policy and procedures for administration of KI to institutionalized persons.