



# Federal Emergency Management Agency

Washington, D.C. 20472

JUL 14 1987

MEMORANDUM TO: Frank J. Congel  
Director, Division of Radiation Protection  
and Emergency Preparedness  
Office of Nuclear Reactor Regulation  
Nuclear Regulatory Commission

FROM: *Richard W. Krimm*  
Richard W. Krimm  
Assistant Associate Director  
Office of Natural and Technological Hazards Programs

SUBJECT: Sunflower Alliance 2.206 Petition

This is in response to the March 3, 1987, memorandum from Edward L. Jordan, Office of Inspection and Enforcement, Nuclear Regulatory Commission (NRC), requesting the Federal Emergency Management Agency (FEMA) to review a motion submitted by Mr. Terry J. Lodge, counsel for the Sunflower Alliance. The NRC had determined that the motion should be treated as a petition filed under 10 CFR 2.206.

FEMA Region V has reviewed the "Intervenors Sunflower Alliance Motion to Reopen the Record and to Submit New Contentions or Alternatively For Applicant To Show Cause Why Its License Should Not Be Modified or Denied," including the attached Affidavit of Theresa M. Burling and the July 14, 1986 letter from the Superintendent of the Jefferson Area Local School District. FEMA's review comments for each of the contentions raised in the Sunflower Alliance petition are reflected below.

## 1. Geauga County Reception/Congregate Care Centers

This contention raised by the Sunflower Alliance is based on the Affidavit filed by Mrs. Burling. She states that she helped conduct a survey in the summer of 1986, related to emergency preparedness for reception/congregate care facilities in Geauga County, Ohio. She states that 3 of the 7 school systems surveyed do not have food, clothing, cots or bedding stored at the schools.

This is an apparent misunderstanding on the part of Mrs. Burling in that there is no requirement that these supplies be stored in these reception/congregate care facilities in advance of an emergency at the Perry Nuclear Power plant. The American Red Cross, by letter of agreement with Geauga County, will provide cots, blankets, and other items at the care centers. The school food supply in addition to local purchase would be utilized for feeding purposes. This is similar to other arrangements around the country for these types of supplies at reception/congregate care centers. FEMA Region V finds these arrangements to be adequate.

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Mrs. Burling stated the purpose of the 1986 survey was to ascertain the availability and adequacy of care center facilities referred to in the Geauga County Radiological Emergency Response Plan (RERP). The following places were questioned: The Notre Dame Academy, Cardinal High School, Kent State University-Burton, and West Geauga Senior High School as "Primary Care Centers"; and Cardinal Middle School, Berkshire High School, Newbury High School, West Geauga Junior High School, Kenston High School, and Kenston Middle School as "alternate care centers." She stated that 5 of the 7 administrations have had no discussions with the American Red Cross, which the plan states is to operate the centers. She also stated at least 4 of the school systems have never been contacted; only one indicated that it had been contacted by the American Red Cross.

As previously mentioned, Geauga County has a signed "Statement of Understanding Between Geauga County and The American Red Cross." This can be found in Appendix 6 (Letters of Agreement), Page 6-1 of the Geauga County RERP dated March, 1986. Page iv of the plan further states that copies of the Geauga County plan have been distributed to the following local schools: Berkshire, Cardinal, Chardon, Kenston, Ledgemont, Newbury, Notre Dame Academy, and West Geauga. Appendix 6 of the plan also shows that Geauga County has letters of agreement with the following schools: Berkshire Local School District, Cardinal Local School District, Chardon Local Schools, Kenston Local School District, Ledgemont Local School District, Newbury Local Schools, Notre Dame Academy, and the West Geauga Local Schools.

The Geauga County Emergency Operations Center's Operations Group Staff include the Geauga County School Superintendent and a liaison from the American Red Cross. To date, two federally evaluated exercises have concluded Geauga County can activate, staff and operate reception/congregate care centers. In the November 28, 1984, full participation exercise, the Federal evaluation team evaluated the Berkshire High School facility. In the 1986 partial participation exercise the Federal evaluation team evaluated the West Geauga High School facility. Both exercises certified the availability and adequacy of these facilities as "care centers."

Mrs. Burling also states that 12,891 evacuees are proposed to be housed in the above care centers, according to the Geauga County RERP. Appendix 26 of the Geauga County RERP simply shows that the capacity of the four primary and the six alternate care centers shown in that appendix total 12,891 spaces. Appendix 20, Sector and Zone Designators for the Perry Nuclear Power Plant, show a population of 90,110 people within ten miles of the Perry Nuclear Power Plant. Appendix 21 shows that 90,867 permanent residents are within ten miles of the Perry Nuclear Power Plant. Appendix 20 also notes that slightly less than 2000 residents of Thompson Township (Gauga County) live within the 10-mile EPZ of the Perry Nuclear Power Plant. Although FEMA does not require a 100 percent congregate care capacity, it is obvious that the congregate care capacity for Geauga County is well in excess of the approximately 2000 Geauga residents within the 10-mile EPZ of the Perry Nuclear Power Plant.



According to a December 24, 1985, FEMA memorandum, the congregate care facility capacity in support of accidents at nuclear power facilities has been reviewed and is usually cited in plans as being between 5 - 15% of the plume EPZ population. This has been judged acceptable by FEMA.

The Ashtabula County plan identifies 15 congregate care facilities with sufficient space for 17,327 evacuees. The standard operating procedures to the Lake County plan identify another 8 congregate care facilities with sufficient space for another 18,064 evacuees.

Thus, using the figures mentioned by FEMA in its 1985 memorandum, it is obvious that there is excess capacity in the Geauga County Centers. This is also true for the congregate care centers in Ashtabula and Lake Counties. Letters of agreement exist between Geauga County, American Red Cross and the above identified Geauga County schools. In addition, the necessary Geauga County EOC staff exists to coordinate the use of the Geauga County congregate care facilities.

2. July 14, 1986 Jefferson Area Local School District Superintendent's Letter

On March 2, 1987, a member of the FEMA Region V staff telephoned and discussed with Mr. E. Lloyd Behr, Superintendent, Jefferson Area Local School District, his letter of July 14, 1986. Mr. Behr pointed out that his letter of July 14, 1986 was written to clarify a legal point and should not be taken to mean that the Jefferson Area Local School District has not nor would not cooperate in disaster planning in response to an accident at the Perry Nuclear Power Plant or any other emergency, natural or man-made. Mr. Behr pointed out that his letter to Michael Wheeler dated May 28, 1985 was in response to planning taking place at that time. Although not stated in Mr. Behr's July 14, 1986 letter, he pointed out in the course of the telephone conversation that the legal avenue to obtain assistance would be the Board of Education of the Jefferson Area Local School District. However, if the issue is that the Superintendent does not believe that he has the authority to do some aspect of the planning and preparedness this could be considered by FEMA if supported by a formal legal opinion.

3. OAPSE Bus Driver Resolution

This references the passage of a non-binding resolution by the Ohio Association of Public School Employees, American Federation of State, County, and Municipal Employees, AFL-CIO (OAPSE-AFSCME), not to participate

FEMA Region V disagrees with this conclusion of the Sunflower Alliance, as stated in the FEMA Region V November 12, 1986 memorandum to FEMA HQ in response to the Susan A. Carter Petition. This memorandum is a status report of the actions taken by the Toledo Edison Company and the State of Ohio in response to the Susan A. Carter Petition to the Nuclear Regulatory Commission. The summary of the memorandum states that "In spite of the resolution passed by OAPSE-AFSCME, Northwest Chapter, it does appear that school employees are willing to cooperate, attend meetings and participate in training related to their emergency duties (school bus drivers, food service, custodial, etc.) in the event of an emergency at the Davis Besse Nuclear Power Station."

Similar training has taken place around the Perry Nuclear Power Plant. Attachment I to this memorandum is a status report of bus driver training conducted in 1986-87 around the Perry plant. The March 9, 1987 letter from the Ohio Disaster Services Agency (ODSA) points out that all training administered after November 13, 1986 has used the guidelines developed by the RPS Corporation for ODSA's use in the Davis Besse area. The ODSA further pointed out that due to their manpower constraints, these courses are currently being conducted by personnel from the Cleveland Electric Illuminating Company.

Mr. D.D. Hulbert (CEI) in his status report of March 5, 1987 indicates twelve bus driver training sessions involving approximately 339 bus drivers had been conducted during 1986-87 to date. FEMA has learned that another training session took place at Chardon, Ohio on April 3, 1987. Mr. Hulbert's status report further points out there were bus driver training sessions conducted in previous years. The report also states that other training sessions have been conducted for Superintendents, Transportation Supervisors, Building Principals, Teachers, and in some cases, Custodians and PTA's.

#### 4. Ashtabula County Medical Center

The Sunflower Alliance alleged that the equipment, personnel, and facilities at the Ashtabula County Medical Center, one of five hospitals designated in emergency plans for the decontamination and treatment of exposed emergency workers, fail to meet the requirements of the Joint Commission on Accreditation for hospitals.

This issue was first raised by the Sunflower Alliance as part of the Atomic Safety and Licensing Board (ASLB) hearing for the Perry Nuclear Power Plant. The ASLB Hearings were held in the period from April 9, 1985 to April 12, 1985. In essence, it has been litigated and a Concluding Partial Initial Decision by the Perry ASLB on September 3, 1985, has been made that went against the allegation made by the Sunflower Alliance. As stated on page 14 of that document, the Ashtabula Hospital is accredited by the State and has been licensed by the NRC for handling contaminated individuals. FEMA does not have the authority to reexamine factual issues which have been settled by a final decision of an ASLB. The Sunflower Alliance does not bring forward new or changed facts which would justify a new investigation.

On March 3, 1987, a member of FEMA Region V discussed the Sunflower Alliance petition with a member of Radiation Management Consultants (RMC) and learned that a training program entitled "Managing The Emergency Care of Radiation Accident Victims" was conducted for staff at the Ashtabula County Medical Center February 19, 1987, at 11:00 A.M.-2:00 P.M. and again at 7:00 -10:00 P.M. This same training was again conducted February 20, 1987, from 7:00-10:00 P.M.

The Medical Center staff also demonstrated their competence and the adequacy of the hospital during the November 28, 1984 full-participation exercise. The following is extracted from the FEMA Region V report of that exercise.

#### "Medical Support

##### 1. Communications

There was a demonstration of the capability to receive, treat and decontaminate an injured contaminated individual at the Ashtabula County Medical Center, Ashtabula, Ohio. The Hospital Emergency Room staff was provided a written notification at approximately 0845 that a contaminated injured individual from the Saybrook Decontamination Station was enroute to the hospital via ambulance and would arrive at approximately 0905.

A member of the Hospital staff explained that the initial communications regarding incoming patients would normally come from the ambulance crews via the two-way Hospital Emergency Ambulance Reporting Net which is located and monitored in the Hospital's Emergency Room area. Communications with the utility, the County EOC, congregate care facilities, radiological laboratories, etc. is via commercial telephone.

##### 2. Hospital Facilities and Procedures

The Hospital staff's Emergency Room spokesperson was unaware of the availability of a health physicist. It was stated that the Hospital's Disaster Chairman is also the Hospital's Radiation Officer. The Emergency Room staff were equipped with and demonstrated effective training in the use of geiger counter



survey meters, TLD's and self-reading dosimeters. It was explained by Emergency Room spokespersons that items such as whole body decontamination trays and water retention barrels were unavailable and means for completely segregating contaminated, injured patients from the rest of the hospital's population are presently incomplete.

The staff, through improvisation of unavailable items of equipment and explanations of procedures, accepted the incoming injured and contaminated patient and went through the procedures for monitoring, handling, decontamination and treatment of the patient. Additionally, they demonstrated procedures for hospital staff Emergency room dress, the issuance of dosimetry (TLD's and self-reading), the disposal of contaminated clothing and equipment and were aware of their responsibilities.

Deficiency: L.I. The Hospital Emergency Room staff did not demonstrate all of the equipment necessary to handle a contaminated injured victim. \*

Recommendation: The State of Ohio should meet with representatives of the Ashtabula County Medical Center to ascertain the availability of appropriate equipment for the handling of a contaminated injured victim.

### 3. Ambulance Facilities and Procedures

This event was out of sequence with the rest of the exercise, in that the patient went to the medical facility earlier in the day so that the procedures at the hospital could be demonstrated.

Later during the exercise the same patient participated in the demonstration of procedures and handling of a contaminated injured person by ambulance crew. He was put on a ambulance cot and simulated being transported to the hospital.

The ambulance crew was part of the Saybrook Fire Department which took part in this exercise at a decontamination station for emergency workers. The ambulance crew was completely suited in protective clothing and they used their instruments and dosimetry equipment correctly. Once the patient had been given first aid he was placed on the ambulance cot, wrapped in disposable blankets and removed from the area.

The ambulance crew demonstrated prior training in the area of handling contaminated patients.

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(\* The use of the term "Deficiency" in 1984 was, in this case, equivalent to the current term "Area Requiring Corrective Action." It was only in July 1985, that it was defined as a more serious flaw in exercise performance. At the time of the Perry exercise, FEMA did not consider this to be a danger to the public health and safety.) Footnote added, not in original text.

4. Scenario (as it relates to medical support)

The scenario was sufficiently designed to drive the medical support activities and thus allow an opportunity to demonstrate these procedures."

The FEMA report of the April 15, 1986 partial participation Perry Nuclear Power Plant exercise, Page 38, as quoted below, revealed that the items not demonstrated during the November 28, 1984 exercise are now available.

"The demonstration of adequacy of hospital facilities and procedures for handling contaminated individuals consisted of a tour of the Ashtabula County Medical Center (ACMC). The walk-through of the hospital revealed that the hospital has the necessary equipment to adequately treat contaminated patients. The equipment observed included equipment mentioned as deficient during the 1984 exercise. This included waste water collection containers, faucet hoses, and a whole-body wash tray. Other improvements to the facilities since the last exercise include non-absorbent paint in the treatment room, grounded faucets, grounded electrical outlets in the room, and increased lighting in the hallway leading to the treatment room."

Given the above, FEMA concluded that the ACMC is capable of treating victims of a radiological accident. The ambulance crew from the Saybrook Fire Department demonstrated adequate care and transportation of the injured contaminated individual to the ACMC.

Since the ACMC is outside the Perry 10-mile EPZ it is not necessary to make preparations for ambulance transport of contamination victims from the Medical Center to other hospitals in the event of a severe radioactive release from the Perry Plant in the direction of Ashtabula.

I hope that this information is useful. If you have any questions, please feel free to contact me at 646-2871 or Robert S. Wilkerson at 646-2861.

Attachments  
As Stated

STATE OF OHIO  
ADJUTANT GENERAL'S DEPARTMENT

2815 WEST GRAYVILLE ROAD  
WORTHINGTON, OHIO 43086-2712

DISASTER SERVICES AGENCY

AGOH-DS-RERP

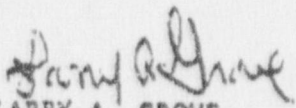
March 9, 1987

Mr. Dan Bement  
FEMA, Region V  
600 South Wacker Street  
Chicago, IL 60606

Dear Dan:

In response to questions concerning bus driver training conducted around the Perry Nuclear Power Plant, I am enclosing a summary of training conducted in 1986-87. All training that was administrated after November 13, 1986 has used the guidelines developed by the RPS Corporation for ODSA's use in the Davis-Besse area. However, due to ODSA manpower constraints, these courses are currently being conducted by personnel from CEI.

If you require additional information, feel free to contact me.

  
LARRY A. GROVE  
Nuclear Response Supervisor

LAG:sjs  
encl



TO: Larry Grove

3/5/87

FROM: D D Hulbert

TEC

Ext: 5317

SUBJECT: School Bus Driver Training

This is a summary of the School Bus Driver training conducted around Perry for the 1986-87 school year. There were also sessions conducted in previous years.

DISTRICT	DATE	DRIVERS
FAIRPORT HARBOR	11-21-86	1
KIRTLAND	12-4-86	13
MADISON	11-11-86	12
	12-1-86	18
MENTOR	1-12-87	41
PAINESVILLE CITY	11-21-86	13
PAINESVILLE TWP	11-14-86	56
PERRY	11-25-86	29
WICKLIFFE	12-8-86	24
WILLOUGHBY-EASTLAKE	12-3-86	23
	12-4-86	27
EAST SHORE	8-13-86	62
LAKE COUNTY MAKE-UP	1-21-87	4
	1-28-87	1
LEDGEMONT	10-8-86	4
	10-10-86	10

## FUTURE TRAINING DATES CURRENTLY SCHEDULED

CHARDON

4-3-87

These are driver training sessions only. There were many other sessions conducted for Superintendents, Transportation Supervisors, Building Principals, Teachers, and in some cases, custodians and PTAs. The depth of training within the individual district was and is determined by the Superintendent.