



Federal Emergency Management Agency

Washington, D.C. 20472

March 17, 1989

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

FROM: *Dennis H. Kwiatkowski*
Dennis H. Kwiatkowski
Assistant Associate Director
Office of Natural and Technological Hazards

SUBJECT: FEMA Support for the Nuclear Regulatory Commission
Licensing Process for the Shoreham Nuclear Power Station

This is in response to your memoranda of November 7, 1988, and December 5, 1988, to Richard W. Krimm, requesting that the Federal Emergency Management Agency (FEMA) review the following documents and provide comments. The documents are:

- °The Long Island Lighting Company (LILCO) draft proposed brochure for farmers, food processors and food distributors for the Shoreham Nuclear Power Station;
- °LILCO's schedule for correcting Areas Requiring Corrective Action (ARCA) identified in FEMA's Post-Exercise Assessment for the June 7 - 9, 1988, Shoreham exercise; and
- °LILCO's responses to FEMA's Review of Revision 10 of the LILCO Offsite Emergency Response Plan for Shoreham and LILCO's proposed changes to be incorporated in the next revision of that plan.

The reviews have been prepared by FEMA Region II and include input from the Regional Assistance Committee (RAC). We realize that LILCO's responses to the FEMA September 9, 1988, Review of Revision 10 do not constitute actual plan revisions. Thus, although in most cases, the responses appear adequate, we must await the submittal of the next plan revision to evaluate the actual changes as they are executed in the plan. The same is true where plan changes constitute part or all of the proposed corrective action for an exercise issue.

In addition, we have reiterated, as a reminder, several items listed in the FEMA review of Revision 10 that LILCO did not specifically address. Finally, as promised on page 6 of the review of Revision 10, we have provided an update of the FEMA review of the LILCO general public information brochure to be distributed in the 10-mile Emergency Planning Zone.

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FEMA continues to support its overall finding of reasonable assurance transmitted to the Nuclear Regulatory Commission (NRC) on September 9, 1988.

Although not specifically addressed in the above mentioned documents, LILCO should take note of the requirement for an Annual Letter of Certification prescribed by FEMA Guidance Memorandum (GM) PR-1, in order to facilitate the monitoring of radiological emergency preparedness (REP) planning and preparedness requirements under NUREG-0654/FEMA-REP-1, Rev. 1, Supp. 1. The Annual Letter of Certification should be submitted to FEMA through the NRC. It is normally due by January 31 of each year and should address compliance with periodic requirements for the preceding year. However, given the impact that the Atomic Safety and Licensing Board (ASLB) proceedings have had on the submittal of information from LILCO, it would be acceptable if the first Annual Letter of Certification were submitted with their next plan revision. Specific items to be addressed are indicated in GM PR-1. That list has been modified as shown on the attached FEMA Region II memorandum to include requirements relating to non-participating organizations, as defined in NUREG-0654/FEMA-REP-1, Rev.1, Supp. 1.

As you will recall, on December 20, 1988, Richard W. Krimm transmitted to you FEMA's preliminary technical review of the Shoreham alert and notification system (ANS) design. I have included a copy of the transmittal memorandum for your information. As stated in that report, the preliminary technical analysis indicates that the Shoreham ANS is adequate to allow its activation for the telephone survey. The report is now under review in FEMA Region II. We have received approval from the Office of Management and Budget to conduct the remaining four telephone surveys, one of which is for Shoreham. We are now in a position to schedule a date for the survey. However, we understand that LILCO intends to distribute the general public information brochure before the survey takes place. The issuance of that brochure is affected by the following discussion.

Further, it is FEMA's position that while the use, and the representation of this use in the public information materials, of LILCO's Bellmore facility as a reception center has been prohibited without the prior approval of the Town of Hempstead, the use of the facility and the representation of use may be permissible under the assumptions and provisions of NUREG-0654/FEMA-REP-1, Rev. 1, Supp.1. However, the FEMA Office of General Counsel has identified both matters as a legal issue. FEMA defers to the NRC on whether LILCO has adequately accommodated the concerns expressed by the Atomic Safety and Licensing Appeal Board in ALAB-905 on this matter. We note that the most current version of draft reception center maps for the brochure for each of the 19 emergency response planning areas (ERPA) contains the following language directly below the map title, "A New York State court has ruled that, because of local zoning laws, this Reception Center may not be used without prior approval of the Town of Hempstead. If this Reception Center is needed during an emergency at the Shoreham Nuclear Power Station, LERO will request the permission of the appropriate official(s) of the Town of Hempstead, Nassau County, or New York State

before it is used." On advice of counsel, FEMA continues to believe that the language of the brochure gives adequate advice to the public, and reflects the correct analysis of the New York Supreme Court decision as applied in the emergency planning context. FEMA's Office of General Counsel bases its advice on continuous tracking of emergency response-related court decisions. FEMA knows of no actual case where zoning restrictions prevented or delayed an emergency response, even by authorized private entities.

As a tangential issue, the above quotation now appears even on reception center maps for ERPA's whose population would be directed to the Roslyn and Hicksville facilities. This was probably a printing error, since the language addresses only zoning restrictions for the Bellmore facility. However, as indicated in the attached review of the brochure, if the language is acceptable to permit Bellmore to be mentioned as a reception center, it should be retained only on maps for Bellmore and deleted from the maps for the other two facilities.

We have also included an attachment listing clarifications/corrections to the FEMA Post-Exercise Assessment on the June 1988 Shoreham exercise. These were compiled in the process of doing preparatory work for the now cancelled OL-5R hearing on the exercise.

We hope that the above information is helpful. If we can be of further assistance, please feel free to contact me at 646-2871.

Attachments
As Stated



Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

March 13, 1989

MEMORANDUM FOR: Dennis H. Kwiatkowski
Assistant Associate Director
Office of Natural and Technological Hazards

FROM: Ihor W. Husar, Chief *Ihor W. Husar*
Natural and Technological Hazards Division

SUBJECT: FEMA Support for NRC Licensing
of the Shoreham Nuclear Power Station

In response to the request of December 9, 1988, from Richard W. Krimm, attached please find our review comments for the following materials:

- LILCO Schedule for Correcting ARCAs Identified at the June 1988 Exercise,
- Proposed Plan Review Changes in Response to RAC Review comments for Rev. 10 of the LERO Plan for Shoreham, and
- LILCO's draft brochure entitled "Radiological Emergency Information for Farmers, Food Processors and Food Distributors", 1989.

It should be noted that these reviews include input from the Regional Assistance Committee (RAC). We realize that LILCO's responses to the FEMA September 9, 1988, Review of Revision 10 do not constitute actual plan revisions. Thus, although in most cases, the responses appear adequate, we must await the submittal of the next plan revision to evaluate the actual changes as they are executed in the plan. The same is true where changes constitute part or all of the proposed corrective action for an exercise issue.

In addition, we have reiterated several items listed in the review of Revision 10 which LILCO did not specifically address. Finally, as we promised on page 6 of the review of Revision 10, we have provided an update of the review of the LILCO public information brochure. Nothing in the attached reviews causes FEMA to modify its overall finding of reasonable assurance transmitted to the Nuclear Regulatory Commission on September 9, 1988.

In addition to the attached comments, the following items should be requested from LILCO:

- (a) Scheduled dates of the public information and the PAR/Accident Management tabletop training drills mentioned in the ARCA responses.
- (b) Letters of Agreement that will expire by the date of the next plan revision and renegotiated bus yard contracts which were to be finalized by December 31, 1988.
- (c) The Annual Letter of Certification as prescribed in GM PR-1, in order to facilitate the monitoring of REP planning and preparedness requirements as indicated in NUREG-0654/FEMA-REP-1, Rev.1, Supp.1. The Annual Letter of Certification should be submitted to FEMA through the NRC. It is normally due by January 31 of each year and should address compliance with periodic requirements for the preceding year. However, given the impact that the Atomic Safety and Licensing Board (ASLB) proceedings have had on the submittal of information from LILCO, it would be acceptable if the first Annual Letter of Certification were submitted with their plan revision. This letter shall include assurances that the requisite activities have been undertaken or completed, as appropriate, by LILCO for the following functions:
 1. Public Education and Information (G): Means of dissemination of information, dates, participants, sponsoring organizations and description of any programs conducted to increase public and media radiological emergency planning and response awareness.
 2. Emergency Facilities and Equipment (H): Type of equipment/instrument, quantity and dates of check/test.
 3. Exercise (N): Testing of all major elements, conducting exercises under various time and seasonal conditions, unannounced exercises and testing of offsite plans for implementing ingestion pathway measures.
 4. Drills (N): Types, dates held and participating organizations.
 5. Radiological Emergency Response Training (O): Offers of training made to non-participating governmental organizations as defined in Supp. 1. Scope and purpose of training given, dates held, number of participants, emergency assignment categories of participants, agencies represented (if appropriate), and sponsors of training.

6. Update of Plans and Letters of Agreement (P): Verification that plans and letters of agreement have been reviewed and appropriate changes made. Updates of plans should include telephone numbers, call-down lists and maps. Verification that copies of the offsite plan and its revisions have been provided to non-participating State and local governmental entities, as prescribed under Element P. 11 of NUREG-0654/FEMA-REP-1, Rev. 1, Supp. 1.

7. Alert and Notification (Appendix 3): Type of tests conducted in accordance with established schedule, dates held, and operability percentage achieved based on periodic testing.

The attachments to this memorandum contain our review comments as referenced above.

We have also included an attachment listing clarification/corrections to the FEMA Post-Exercise Assessment on the June 1988 Shoreham exercise. These were compiled in the process of doing preparatory work for the now cancelled OL-5R hearing on the exercise.

Attachments
As Stated

March 13, 1989

Attachment 1

Page 1 of 6

Review of the LILCO Schedule for Correcting Exercise ARCAs
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

NUREG-0654

Item No. Supp. 1 Ref.

Evaluation of LERO Responses

REVIEW OF LILCO SCHEDULE FOR CORRECTING ARCAs

LERO EOC

1. E.1 Proposed response should be adequate.
2. E.5, I.8 Proposed response should be adequate when combined with the response to FEMA's evaluation of E.5 aspects of Revision 10. See item C of plan comments. Also, the scheduled date of the Public Information Tabletop training drill should be included.
3. J.11 Proposed response should be adequate. Also, scheduled dates of the PAR/Accident Management tabletop training drills should be included.
4. K.3.b Proposed response should be adequate when combined with the response to FEMA's evaluation of K.3.b aspects of Rev. 10. Also, LILCO was aware prior to the exercise that the exercise evaluation methodology did not include any statistical treatment of either scope or expected response. It is not appropriate at this point to attempt to discuss responses on a statistical basis.
5. K.4 LILCO was aware prior to the exercise that the exercise evaluation methodology did not include any statistical treatment of either scope or expected response. It is not appropriate at this point to attempt to discuss response on a statistical basis. See item y of plan review comments - this is generic for all emergency workers not just bus drivers.

March 13, 1989

Attachment 1

Page 2 of 6

Review of the LILCO Schedule for Correcting Exercise ARCAs
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

NUREG-0654		
<u>Item No.</u>	<u>Supp. 1 Ref.</u>	<u>Evaluation of LERO Responses</u>
6.	J.10.e	Proposed response should be adequate.
7.	Sect. 2.13.3 1988 PEA	Proposed response should be adequate.
8.	J.10.g	Proposed response should be adequate.
9.	J.10.g	The proposed response does not consider how the school bus drivers will be made aware of traffic conditions. The traffic management plan which results in the ETE used in the planning efforts is not based on the bus drivers making their own decisions on the appropriate routes.
10.	Sect. 2.13.4 1988 PEA	Proposed response should be adequate.
11.	J.12	LILCO was aware prior to the exercise that the exercise evaluation methodology did not include any statistical treatment of either scope or expected response. It is not appropriate at this point to attempt to discuss responses on a statistical basis. Otherwise, the response should be adequate.
12.	K.4	Proposed response should be adequate.
RIVERHEAD STAGING AREA		
1.	J.10.K	Proposed response should be adequate.
2.	J.10.K	LILCO was aware prior to the exercise that the exercise evaluation methodology did not include any statistical treatment of either scope or expected response. It is not appropriate at this point to attempt to discuss responses on a statistical

Review of the LILCO Schedule for Correcting Exercise ARCAs
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

<u>Item No.</u>	<u>NUREG-0654 Supp. 1 Ref.</u>	<u>Evaluation of LERO Responses</u>
		basis. Proposed response should be adequate.
3.	K.3.b	See EOC #4
RECEPTION CENTERS		
1.	J.12	Proposed response should be adequate.
MEDICAL DRILL		
1.	L.1	Proposed response should be adequate.
2.	L.1	Proposed response should be adequate, assuming that new LOAs, if appropriate, are received from hospitals where there is an increase in monitoring personnel.
3.	L.1	Proposed response should be adequate.
<u>REVIEW OF LERO RESPONSE TO RAC/FEMA REVIEW OF REV.10 OF THE PLAN</u>		
a.	A.2.a	Proposed response should be adequate.
b.	C.3, I.9	Proposed response should be adequate. However, if the helicopter contractor is other than "Island Helicopter", a new LOA would also be required.
---	C.4	As noted in FEMA's review of Rev. 10, a final determination of the adequacy of ambulance resources is to be based on FEMA's review of the computerized Homebound Evacuation listing. This comment was not addressed. Also, see other responses which may require new or modified LOAs. As an additional reminder, LILCO should note that several LOAs expire before the proposed date of their next plan revision.

Review of the LILCO Schedule for Correcting Exercise ARCA's
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

<u>Item No.</u>	<u>NUREG-0654 Supp. 1 Ref.</u>	<u>Evaluation of LERO Responses</u>
c.	E.5	It is not clear that the proposed response will necessarily yield more concise EBS messages. In addition, Attachment 5 of OPIP 3.8.2 should be reviewed to make sure the landmark descriptions are present for all combinations of ERPAs under LILCO's PAR strategy, i.e., sheltering as well as evacuation.
d.	F.1.b	Proposed response should be adequate. "Dept. of Emergency" should be Dept. of Energy.
---	F.1.b	Submission of LERO directory to FEMA for review is addressed in response to changes for element H.4. This must be submitted at time of the next plan revision.
e.	F.1.e	Proposed response should be adequate.
f.	G.4.a	Proposed response should be adequate.
g.	G.4.c	The adequacy of the numbers cannot be determined until we examine the information mentioned. This must be submitted at the time of the next plan submission.
h.	H.4	Proposed response should be adequate.
i.	I.9	See comments to C.3.
j.	J.10.a	The proposed response related to the radiological sampling should be adequate.

Review of the LILCO Schedule for Correcting Exercise ARCAs
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

<u>Item No.</u>	<u>NUREG-0654 Supp. 1 Ref.</u>	<u>Evaluation of LERO Responses</u>
k+l.	J . 1 0 . e , J.10.f	The proposed procedural modification should be adequate. The notification of route alert and school bus drivers by pager is acceptable.
m.	J.10.g	Proposed response should be adequate.
---	J.10.g	LILCO should submit the renegotiated bus yard contracts, mentioned in FEMA's review of Revision 10 under element J.10.g, which verify the numbers of vehicles.
n+o.	J.10.g	Proposed response should be adequate provided that information is submitted with the next plan revision and it corrects the issues raised in FEMA's review.
p.	J.10.h	Proposed response should be adequate. As an additional note, the list in OPIP 3.6.5, Attachment 5 should be cross-referenced to Section 3.7.1, or OPIP 4.2.3 or OPIP 4.2.2.
q.	J.10.j	Proposed response should be adequate.
r.	J.10.j	Proposed response should be adequate.
s.	J.10.k	Proposed response should be adequate.
t.	J.10.m	It is not clear that the proposed revisions adequately address the FEMA comment. Therefore, procedures will be reviewed when submitted .
u.	J.11	Proposed response should be adequate.
v.	J.12	Proposed response should be adequate.
w.	J.12	Proposed response should be adequate.

Review of the LILCO Schedule for Correcting Exercise ARCAs
and Proposed Plan Review Changes in Response to
RAC Review Comments for Rev. 10 of the Plan

<u>Item No.</u>	<u>NUREG-0654 Supp. 1 Ref.</u>	<u>Evaluation of LERO Responses</u>
---	J.12	Also see comments concerning the Bellmore reception Center under Attachment 2.
x.	K.3.b	Proposed response should be adequate.
y.	K.4	This issue was identified for school bus drivers. However, it is a generic issue with all emergency workers and the proposed revisions should address all female emergency workers. See EOC ARCA #5.
z.	K.4	While a plan change is important for consistency, during an incident the responders follow procedures. This clarification should also be included in the appropriate procedures (OPIPs).
aa.	K.5.b	Proposed response should be adequate.
ab.	L.1	While a plan change is important for consistency, during an incident the responders follow procedures. This clarification should also be included in the appropriate procedures (OPIPs).

March 13, 1989

Attachment 2

Page 1 of 3

Review of the LILCO Public Information Brochure for the General Public in the 10-Mile EPZ.

A black and white copy of the July 28, 1988 version of the public information brochure referenced on page 6 of FEMA's review of Revision 10 of the LILCO plan was reviewed by FEMA. FEMA has also recently informally obtained color copies of the cover and pages 1 and 2 of the brochure. These will be sent to FEMA's contractor for review of the color scheme. In addition, FEMA has also recently informally received a copy of the 1989 version of the brochure for Zone A and a complete set of the map inserts to be contained in the brochure for Zones B-S. FEMA Region II staff has reviewed the Zone A brochure for differences with the 1988 version and for consistency with Revision 10 of the plan.

As an initial comment, before finalizing the public information brochure, LILCO must review its contents against plan changes resulting from the revisions it proposes in response to FEMA's September 9, 1988 review of Revision 10 and the Post-Exercise Assessment of the June 1988 exercise. More specific comments are below:

1. The information regarding Protective Actions (i.e., sheltering, evacuation, early dismissal of schools, and assistance for persons needing special assistance) are consistent with provisions contained in the plan. While the brochure does not contain specific instructions for handicapped individuals who had not previously informed LILCO of their needs via the special mail-in card, the plan, in OPIP 3.8.2, contains provisions for the announcement of an emergency number in EBS messages so that these individuals may request assistance at the time of an emergency.
2. The brochure describes school relocation centers and lists the pre-assigned relocation center for each school in the table on pages 7 and 8. This table lists the Emergency Planning Zone in which the school is located and indicates those schools that are outside the 10-mile EPZ which serve children who live inside the EPZ. However, to remain consistent with Revision 10 of the plan,
 - the Terryville School located in Zone K (see OPIP 3.6.5, Attachment 3a, page 3 of 6) must be added to the list of schools identified for the Comsewogue Union Free School District. This school was listed in the 1988 version of the brochure.

3. FEMA recommends that references on page 14 of the LILCO brochure to differences between a nuclear reactor and a bomb should specify that it is a "nuclear bomb." Also, the phrase "like a nuclear bomb", should be added to the end of the sentence, "A nuclear power plant cannot explode."
4. The maps on pages 9-12 are legible and clearly marked. They are marked "FOR POSITION ONLY." Assuming that the maps presented in the final version of the brochure are of equal or better quality, they are adequate. These maps are zone-specific and illustrate the following:
 - Landmarks which delineate the Emergency Planning Zone;
 - Evacuation routes with arrows and detailed directions that should be followed to leave the area;
 - Location of the reception center to which the zone is assigned and the school relocation centers at Nassau County Coliseum and Nassau County Community College; and
 - Bus routes along which ambulatory transit dependent evacuees will be picked up for transportation to their reception center.
5. The LILCO Plan provides for separate public information brochures to be published and distributed for each of the 19 emergency planning zones in the 10-mile EPZ. They vary with respect to information specifically tailored to individuals in each zone, e.g. reception center locations, etc. The brochures for several zones direct the public to the Bellmore reception center. Recently updated maps to be used on page 11 of each brochure state that "A New York State court has ruled that, because of local zoning laws, this Reception Center may not be used without prior approval of the Town of Hempstead. If this Reception Center is needed during an emergency at the Shoreham Nuclear Power Station, LERO will request the permission of the appropriate official(s) of the Town of Hempstead, Nassau County, or New York State before it is used." Such a comment, while addressing the Town of Hempstead's current zoning restrictions on the Bellmore reception center, also appears, inappropriately, on the maps for zones whose population might be directed to the Roslyn and

Hicksville reception centers. It should be limited to the maps for zones whose population might be directed to the Bellmore reception center.

Further, it is FEMA's position that while the use, and the representation of this use in public information materials, of the Bellmore facility has been prohibited without the prior approval of the Town of Hempstead, the use of the facility and the representation of use may be permissible under the assumptions and provisions of NUREG-0654/FEMA-REP-1, Rev.1, Supp.1. However, FEMA has identified, on advice of counsel, both items as legal issues. FEMA defers to the Nuclear Regulatory Commission on whether LILCO has adequately accommodated the concerns expressed by the Atomic Safety and Licensing Appeal Board in ALAB-905 on this matter.

6. A more specific effective date (month and year) should be added to the brochure so that the recipients know whether they have a current version.

Review of the LILCO Information Brochure entitled
"Radiological Emergency Information for Farmers, Food
Processors and Food Distributors," 1989.

As an initial comment, pages 14 and 15 of the September 9, 1988, FEMA review of Revision 10 of the LILCO plan, state that LILCO is not required to submit its agricultural brochure to meet the annual distribution requirements of Guidance Memorandum (GM) IN-1 until 60 days after the final publication of the USDA generic agricultural brochure. The deadline for meeting this requirement was extended, for all sites, to 120 days in the attached October 14, 1988 letter from Richard W. Krimm to the Government Affairs Representative for the Maine Yankee Nuclear Power Plant. The USDA generic agricultural brochure has not yet been finalized.

Specific comments are as follows:

1. There is a statement under the LILCO logo on the back of the brochure which indicates that the agricultural brochure will be updated and distributed on an annual basis. The first paragraph of the brochure also explains that the pamphlet has been prepared for appropriate individuals within 50 miles of the plant. If annual distribution is contemplated with the 50-mile EPZ, page 3.8-1 of the plan should be revised to reflect this.
2. In the section entitled "What is Radiation?," cosmic rays are identified incorrectly as being an example of non-ionizing radiation. In addition, it would be helpful to identify "radioactive materials" as a source of ionizing radiation and as contamination. The definition of "Contamination" which is contained in section entitled "What Should be Done If My Fruits and Vegetables are Contaminated?", should be included in the "What is Radiation?" section.
3. In the section entitled "What Actions Might be Recommended?," the first sentence of the second paragraph should be modified to include "farm products" in the categories for which actions will be recommended within 10 miles of the plant.
4. The second paragraph in the introductory section mentions that, "emergency plans have been prepared by the Long Island Lighting Company, as well as Connecticut and New York State,..." FEMA has no knowledge that New York State has prepared an ingestion pathway plan for Shoreham.
5. A color proof-print copy of the agricultural information brochure should be provided to FEMA in order to determine the final quality of this brochure and to provide

technical assistance to LILCO if improvements are needed.

6. A statement should be included on the cover encouraging the recipients of the brochure to retain it.
7. A more specific effective date (month and year) should be added to the brochure so that recipients will know if they have a current version.
8. The average readability of the document is 11th-12th grade, although for some passages the reading level is lower. Readability was assessed using the Dale-Chall formula, with adjustments made to consider the vocabulary familiar to the agricultural community and the repetitious use of terms such as "contamination" which were defined in the booklet. Information about the education level and reading ability of the target population are necessary to determine if the reading level of the document is appropriate.

**SHOREHAM POST-EXERCISE ASSESSMENT
REPORT CLARIFICATION SHEET**

The following constitute additions and/or corrections to the FEMA Post-Exercise Assessment (PEA) of the June 7-9, 1988 Exercise of the Local Emergency Response Organization (LERO) as specified in the Long Island Lighting Company's (LILCO) Local Off-Site Radiological Emergency Response Plan for Shoreham Nuclear Power Station, dated September 2, 1988.

- Page 4 For the homebound ambulance/ambulette patients, six vehicles (ambulances/ambulettes) were deployed and evaluated by FEMA observers; one in Zone A, two in Zone B, two in Zone C and one in Zone E. Please note a typographical error in the chart on page 4, FEMA PEA, regarding MOBILITY IMPAIRED. Zone E listed for evaluator Rhude was actually Zone C, and Zone A listed for evaluator Wang was actually Zone E.
- Page 7 FEMA evaluator L. Testa listed on page 7 actually used her maiden name on her evaluator forms and, therefore, should be listed as L. Biliski.
- Page 9 Add Controller M. DiGregory from FEMA as the Control Cell Liaison at the EOC.

Page 35 Third line: change "Reception Centers" to "Relocation Centers".

Page 52 Add the following language after numbered paragraph 4:
It should be noted, as discussed on page 31, that at the beginning of the exercise on Day 2 (June 8, 1988), exercise time was restarted from the suspension of the exercise at 1800 on Day 1 (June 7, 1988). Therefore, EBS message #8 discussed above was actually an exercise Day 1 message.

Page 98 Second paragraph, line 4 should read: "Activity on Day 2 of the exercise involved simulated transport ..."



Federal Emergency Management Agency

Washington, D.C. 20472

OCT 14 1988

Ms. Leann Diehl
Government Affairs Representative
Maine Yankee
Edison Drive
Augusta, Maine 04330

Dear Ms. Diehl:

This responds to your letter of September 2, 1988, requesting confirmation of the policy of the Federal Emergency Management Agency (FEMA) on the public information provisions of Guidance Memoranda (GM) IN-1 (The Ingestion Exposure Pathway). Your inquiry regarding the use of the Federal generic ingestion brochure to satisfy the provisions of GM IN-1 is addressed below.

There are three major public information provisions in GM IN-1 in the section on NUREG-0654/FEMA-REP-1, Rev. 1 planning standard G on pages 6-10: (1) Distribution of generic, pre-emergency information, (2) distribution of site-specific emergency information and instructions and (3) prescribed Emergency Broadcast System instructions pertaining to ingestion measures. The third provision is not addressed in this letter as it is not directly impacted by the issue of the Federally-developed generic ingestion brochure.

1. Generic, Pre-Emergency Information. The Federally-developed ingestion brochure can be used by State and local governments and utilities to meet the GM IN-1 provision for the annual distribution of generic, ingestion-related information to the public. This distribution should be made within the 10-mile plume exposure pathway emergency planning zone (EPZ) through brochures or other similar materials.

2. Site-Specific, Emergency Information and Instructions. Two options are provided in GM IN-1 for meeting the intent of this provision: (1) The Federally-developed brochure may be amended by the addition of site-specific information and instructions or (2) separate materials (e.g., fact sheets) may be developed for distribution of site-specific information and instructions to designated persons and organizations involved in the food chain network during a radiological emergency.

The revision of State and local government and utility offsite plans to incorporate the provisions of GM IN-1 should be completed by 12/31/88, or 120 days after issuance of the generic ingestion brochure, whichever is later. This time frame will permit sufficient time for distribution of the generic brochure and for development of site-specific informational and instructional materials. Until such time that the generic, Federally-developed brochure is available, we encourage organizations with responsibilities for ingestion measures to proceed with identifying their site-specific emergency information and instruction needs.

Any concerns or questions about this letter should be referred to Bill
McLutt at 202-646-2857.

Sincerely,

Richard W. Krimm

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

cc: Mr. George Bickerton, USDA

FEMA ONTH Chiefs

Maine Yankee
RELIABLE ELECTRICITY FOR MAINE SINCE 1972

EDISON DRIVE • AUGUSTA, MAINE 04330 • (207) 623-3521

September 2, 1988

Mr. Vern Wingert
Emergency Management Specialist
Federal Emergency Management Agency
Room 630
500 "C" Street, S.W.
Washington, D.C. 20472

Dear Mr. Wingert:

Maine Yankee is very interested in using the USDA Ingestion Pathway Brochure as its own brochure (to meet federal guidelines).

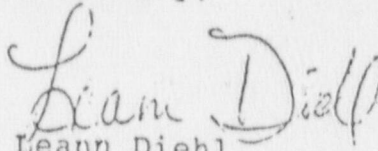
We understand from George Bickerton, Director of Emergency Planning at USDA, that the USDA brochure is now undergoing revisions. When completed, it is expected to be fully approved by FEMA as meeting the GM IN-1 requirements.

We also understand that if the USDA brochure is not completed by December 31, 1988, FEMA will grant an extension on the deadline by which nuclear power plants must have completed their own ingestion pathway brochure.

Could you please send me a letter which confirms this information?

Thank you.

Sincerely,



Leann Diehl
Government Affairs Representative

LRD/klg

cc: George Bickerton

DEC 4 1988

MEMORANDUM FOR: Frank J. Congel
Director
Division of Radiological Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulations
U. S. Nuclear Regulatory Commission

FROM: ~~Richard W. Krimm~~
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SUBJECT: Preliminary Review of the Shoreham Nuclear Power
Station Alert and Notification System

The Federal Emergency Management Agency (FEMA) has completed the preliminary technical review of the Shoreham Nuclear Power Station alert and notification system (ANS). A preliminary draft report assessing the adequacy of the siren coverage provided by the Shoreham ANS has been completed and forwarded to FEMA Region II for review. A copy of this preliminary report is enclosed for your information.

Preparation of a preliminary ANS report is the first step in FEMA's ANS review process. If the ANS alerting coverage is determined to be adequate in the preliminary technical analysis, a telephone survey of households in the emergency planning zone is conducted following a full activation of the ANS to determine the percentage of the population directly alerted by the system. After the telephone survey a final draft report incorporating the results of the survey is prepared for Regional review. Once all FEMA REP-10 requirements are satisfied, a final report is issued to NRC along with a finding on the adequacy of the ANS. Since our preliminary technical analysis indicates that the alerting coverage provided by the Shoreham ANS is adequate, the telephone survey can now be scheduled.

We are currently waiting for approval from the Office of Management and Budget (OMB) to conduct the four remaining telephone surveys in our alert and notification system review program; however, we expect OMB approval in the near future and would like to begin preparing for the Shoreham survey. To assist us in the preparations we would appreciate it if the NRC could coordinate with the Long Island Lighting Company to establish a survey date with the understanding, of course, that any date chosen must be acceptable to FEMA and our technical contractors. Approximately six weeks will be required to draw the sample; therefore, most dates after late January 1989 could be accommodated for conducting the survey.

If you need any additional information to assist you in this coordination effort, please call me at 646-2871.