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Idaho National Engineering Laboratory

FEMA Panel Ex #32

87 AUG 25 A9:21

SS Exercise #105

6/11/87 mas

JHK-17-86

March 19, 1985

50-322-06-5

6/11/87

I-5C-105

Roger B. Kowieski, Chairman  
Regional Assistance Committee  
Region II  
Federal Emergency Management Agency  
25 Federal Plaza  
New York, NY 10278

Dear Mr. Kowieski:

Subject: Comments On The Draft Shoreham Report

The INEL evaluators have reviewed the subject report and would all like to commend the ANL report writers for an excellent job. Drawing together inputs from the many evaluators and preparing a report which reads as well as this draft is indeed difficult and often a thankless task.

We have paid particular attention to our own areas of evaluation and I have reviewed the entire draft. Our collective comments follow. My major concern is one of consistency. It appears that in several cases the evaluator has rated an issue as a less serious problem than has been rated in other exercises in New York. This is not fair or correct. Clearly the report writers have taken what was presented and this issue is with individual evaluators not with the report writers.

If you have any questions, please contact me.

Sincerely,

J. H. Keller, Fellow Scientist  
Special Programs

cc: M. Lawless - FEMA  
c. Siebentritt - FEMA

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PDR ADDCK 05000322  
G PDR

731801

NUCLEAR REGULATORY COMMISSION

Docket No. 50-32206-5 Official Ex. No. 105  
 in the matter of Shoreham Nuclear Power Station Unit 1

Staff \_\_\_\_\_ IDENTIFIED \_\_\_\_\_  
 Applicant \_\_\_\_\_ RECEIVED \_\_\_\_\_  
 Intervenor \_\_\_\_\_ REJECTED \_\_\_\_\_  
 Coal's Offr \_\_\_\_\_  
 Contractor \_\_\_\_\_ DATE 6-11-87  
 User \_\_\_\_\_ Withers \_\_\_\_\_  
 Reporter M. M. S. S. S.

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Comment

ix, parag 4

The statement that the objectives were partly met does not seem to be supported by the rest of the paragraph. The only negative statement concerns the dose projection status board (next page). The body of the report does indicate that these objectives were only partly met and gives the reason for not meeting the objective. It would appear that the summary need more detail to support the partly met statement.

xiii, line 8

I do not understand the basis for the comment concerning the need for additional training. The previous sentence says that both drivers were well briefed and the Table on page 24 says that only two bus routes were to be evaluated.

xiii, last line

I think the last sentence could be reworded to improve the readability.

xv, line 2

The sentence is not clear. I am not sure that the Traffic Guides need to know the general public PAG's. What they need to know is how to use their dosimetry and what values on the DRD's would require notification of supervision and who would authorize excess exposure.

xviii, line 9

While it is true that the monitoring of the RAC chairman took more time than that called for in the plan, the evaluators at the reception center did not see fit to comment on this fact in their report (see page 115). I believe the body of the report takes the correct approach. If the approximately 100 people who were processed at the reception center were monitored in the planned time why is it appropriate to point out the one exception. This statement should be deleted from the summary. If the decision is made to leave this statement in the summary, additional material is required in the body of the report to support this issue.

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This figure is very difficult to read. Also there are several errors in the figure. According to the written account of assignments on the previous pages, P. McIntire should be added to the FEMA Command Post. The assignments of P. Becherman and W. Gasper should be reviewed and corrected or the previous page should be corrected.

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23, line 7	The statement should be modified to clearly indicate that these two teams were DOE-RAP teams operating in support of LERO.
29,	The entry under the BHO for the time of facility declared operational should be 0745. I believe this was my error during the time line meeting. I thought I corrected the entry at that time, sorry.
40, lines 15-22 and 45, #6	This whole discussion should be reviewed very carefully. My review of the scenario and Attachment 5 to OPIP 3.6.1 indicates that some rewording is needed. Attachment 5 is intended for General Emergency ECL use and contains the terms core failure, which is defined in the footnote as release of fission products into containment and containment failure, defined as release of fission products into the atmosphere. In the exercise scenario there was never a release into containment as such. The release pathway was by way of a broken steam line outside containment and the failure to be able to isolate the steam line. This condition was the cause of the Site Area ECL which was reported to the LERO EOC at 0824. One could conclude that the inability to isolate the steam line and hence the leak is a loss of containment and in fact a small low level leak to the environment was occurring and was reported to the LERO EOC at 0830. The General Emergency ECL was declared and reported to the LERO EOC at 0946. This declaration was caused by the continued loss of water from the primary system due to the steam leak and the loss of several water supply sources due to the loss of an electrical supply bus. The core had at this time not failed to a degree to necessitate the declaration of a General Emergency ECL due to dose rates offsite but clearly the potential existed for core failure. The EOF noted the major release at 1130 which indicated core failure although the time the LERO EOC was notified was not reported. I have no problem with the concept of the issue reported here however, I believe some rewording is essential.
42, lines 14-16	How can this be rated met? The discussion and the Table 2.1 clearly show that the siren may have been sounded within the 15 minute standard but the instructional message (EBS) was not given to the public within the 15 minute standard in all cases.

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53, # 4	This appears to be the same as the Deficiency shown on page 51. Why give two hits on the same issue?
56, #12	This issue should be rated as a Deficiency. The Region II analysis of this issue in other exercises has rated the failure to supply the instructional message to the public (EBS message) within the 15 minute standard as a Deficiency (then called a category A). The evaluation of the same failure should be consistently rated. If the decision is made to change this rating, additional wording changes are required in the body of the report.
58, 4th issue	It would seem to me that this is an area requiring corrective action not an area recommended for improvement. I could not tell if the tone alert radios were activated based on the discussion on page 44. However, since tone alert radios are often used in areas where siren coverage is not adequate, I would think that there should be no possible confusion and that corrective action is required.
59, line 12	There is confusion between the statement concerning school evacuation and the Table on page 24.
66, line 5	I think a rearrangement of what is written would improve readability by bringing similar issues together. Specifically I recommend moving three sentences starting with "After receiving.....and ending with ... timely manner" to after the word basis in the first line.
68, line 1	Change the first word in the first full sentence from "The" to "Two" computer. ..
71, Corrective Action	The evaluator rated this issue as being an area recommended for improvement. The issue would improve a better than adequate performance. Additional equipment was available in the event that some equipment was contaminated. This rating should be changed.
71, line 20	Make "reading" plural.
74, lines 2-3	The times listed do not correspond to the data in Table 1.7.2 on page 30.

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74, line 23	The evacuation zones should read A to M not A, M. If the rumor control information actually said A and M and not A to M, this is another issue which should be discussed and rated.
81, #1 93, #1 106, #1	The issue of the time required to alert the public in the event of a siren failure is an proper issue however, in my opinion the rating should be a Deficiency. As I read NUREG 0654 Appendix 3, Section B.2.c, the acceptance criteria calls for a design objective of a 45 minute notification of the population who may not have received the initial notification. I also think that a siren failure would result in some parts of the population not receiving the initial notification. I understand that a design objective is not necessarily a performance standard however, if one considers the time necessary to identify which siren has failed, notify the staging area, dispatch route alerting drivers, and complete the route, it would appear that the 45 minute design objective cannot be met. The exercise evaluation did not include the initial step in the process and still took considerably longer that the design objective.
111, line 12	The statement is true but does not give much detail. Based on discussions with the evaluator, I suggest deleting the current sentence and replacing it with: "The generation of liquid waste was minimized by not using flooding methods. As an alternate to flooding, decontamination of vehicle surfaces was accomplished by paper towels, swipes, and damp cloths which were included in the solid waste."
115, Sect 2.10	In my opinion some mention must be made of the fact that the two congregate care centers demonstrated are not in the plan. Revision 6 of the plan was submitted through the NRC just prior to the exercise and no mention was made of these centers. The plan currently says on page App-B-10 in the letter of agreement with the Red Cross; "In addition, there exist agreements between the Nassau County Chapter of the American Red Cross and the facilities named on the attached list, allowing the Red Cross to use the facilities for shelter during an emergency." (emphasis added).

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115, Sect 2.10  
(Con't)

Neither of the facilities demonstrated appear on the attached list. It has always been my understanding that an exercise is a demonstration of the implementation of a plan not just that acceptable actions can be taken. At the very least, additional letters of agreement are required.

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