UNITED STATES
NUCLEAR REGULATORY COMMISSION

ORIGINAL

ATOMIC SAFETY AND LICENSING BOARD

In the Matter of:	)	
	)	Docket Nos.
PUBLIC SERVICE COMPANY OF	)	50-443-OL
NEW HAMPSHIRE, et al.,	)	50-444-OL
	)	OFF-SITE EMERGENCY
(SEABROOK STATION, UNITS 1 AND 2)	)	PLANNING

EVIDENTIARY HEARING

Pages: 21482 through 21771

Place: Boston, Massachusetts

Date: May 17, 1989

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ADD: MARJORIE MORDINGER

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EVIDENTIARY HEARING

Wednesday,
May, 17, 1989

Auditorium
Thomas P. O'Neill, Jr.
Federal Building
10 Causeway Street
Boston, Massachusetts

The above-entitled matter came on for hearing, pursuant to notice, at 8:59 a.m.

BEFORE: JUDGE IVAN W. SMITH, CHAIRMAN
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

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U.S. Nuclear Regulatory Commission
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JUDGE RICHARD F. COLE, MEMBER
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I N D E X

WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS	EXAM
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EXHIBITS:	IDENT.	REC.	REJ.	DESCRIPTION:
MASS AG:				
89	21509	21510		102 CMR: Office for Children 7.07
90	21509	21510		102 CMR: Office for Children, Section 3
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P R O C E E D I N G S

JUDGE SMITH: Good morning.

Is there any preliminary business?

MR. BROCK: Yes, Your Honor.

I just wanted a clarification to be sure I understood the Board's request. I was not present yesterday.

I understand that the Board has made some directive to Mass AG with reference to our motion to admit a late filed contention. The Applicants filed a response to that dated May 15. I just want to be clear as to the Board's pleasure, is that we are to file a written reply to that response by Friday?

Is that the understanding?

JUDGE SMITH: Well, there are two factors involved. I don't have the pleadings before me right now. I'm going by memory, but one is the answer to the motion to admit the late filed contention alluded to information which I believe a well pleaded motion should have contained.

Number two, were you not to provide additional information, we would be inclined to deny the motion if for no other reason then that of its incompleteness.

And there is another subtlety to it, however, and that is, we should not deny a motion for a late filed issue or a motion for any issue or intervention on any basis as to

which the movant has not had an opportunity to address.

So putting all those things together, there is something that has to be done by you before we can properly dispose of the motion. Oral argument is fine. However, if time is a consideration, a written reply also would be fine.

On a written reply to a motion of this nature, I would expect you to acknowledge the points that should be acknowledged against you, and make your argument where the issue really lies.

MR. BROCK: Fine, Your Honor. We will have a written reply served by Friday.

JUDGE SMITH: That would be fine.

MR. BROCK: And would the understand that argument would be on that same day, Your Honor, would that be appropriate?

JUDGE SMITH: Yes.

Who is your counterpart on that motion?

MR. BROCK: I believe Mr. Trout.

JUDGE SMITH: Who?

MR. BROCK: Mr. Trout, I believe.

JUDGE SMITH: Mr. Trout. Well, he is here.

MR. TROUT: Do I understand that the Mass AG is going to file a response to our response to their motion?

JUDGE SMITH: That's correct.

MR. TROUT: And the Board has granted leave for

that.

JUDGE SMITH: I guess you didn't hear right.

Did you just come in?

MR. TROUT: Yes. I'm sorry, Your Honor.

JUDGE SMITH: I told Mr. Brock that we believe that his motion in the first instance should have covered the factual points made by you in your response to the motion. And for that reason alone, the incompleteness of the motion, we might be inclined to deny it for no other reason.

Then there is another aspect to it, too. And that is, normally we should not turn down a motion of this nature on the basis of any circumstance as to which the movant has not had an opportunity to address. That's a distinct point from what they should have addressed to begin with.

So if new considerations are raised in the response, they have to have an opportunity to address it. So he understands that. He is going to file a written motion by Friday and be available for oral arguments on Friday, if it can be worked into the schedule and if it's satisfactory to you.

MR. TROUT: It's satisfactory to Applicants, Your Honor.

JUDGE SMITH: Okay.

MR. BROCK: Thank you, Your Honor.

JUDGE SMITH: Any other preliminary business?

Mr. Traficonte.

MR. TRAFICONTE: Your Honor, I'm sorry I am late. Was that the first item?

JUDGE SMITH: Yes.

MR. TRAFICONTE: I did check on the morgue, and I just want to note -- unfortunately, I didn't bring additional copies of this. But I am going to read a section from your December 15, 1988 memorandum and order ruling on the June 1988 exercise contentions.

The Mass AG had filed an exercise Contention No. 20 which ran to the inadequacies of certain facilities as revealed by the exercise.

Does the Board have a copy of this memorandum? It's on page 49, in any event.

JUDGE SMITH: I am sure we do some place.

MR. TRAFICONTE: I thought you were turning to it. It's on page 49.

No, I'm sorry. I may have directed you to the wrong --

JUDGE SMITH: That's not it.

MR. TRAFICONTE: No, that isn't it. It might be the next one.

Well, it was that one last night, Your Honor. Wait a minute.

(Pause.)

MR. TRAFICONTE: Yes, it's MAG Exercise Contention No. 14 on page 41.

That contention challenged the adequacy of certain medical facilities, equipment, procedures and personnel as revealed by the exercise. And specifically, Basis B of that contention read, "The facilities at the hospital which were tested are inadequate in that contaminated ambulatory individuals are taken to the morgue for decontamination."

On page 42 of your opinion, I'm reading from the slip opinion, in the first full paragraph on that page you ruled as follows: "We agree with Applicants that the matters alleged in Bases A and B do not demonstrate fundamental flaws. There is no requirement that each and every emergency response facility participate in the exercise."

And then skipping one sentence, "We readily agree with the Attorney General that that hospital's morgue is not an adequate facility in which to decontaminate ambulatory patients. A suitable facility must be substituted."

JUDGE SMITH: We were feeling rather feisty that day, just a preemptory order and I suppose --

(Laughter)

MR. TRAFICONTE: I didn't use the word "preemptory", but I think that is a preemptory order.

JUDGE SMITH: Well, it hasn't been appealed either.

MR. TRAFICONTE: No, it hasn't. I think the 30 days may have come and run on that too.

JUDGE SMITH: Well, I hear an eloquent silence on the other side of the room. I don't know where we are on that.

MR. TRAFICONTE: The only reason why I brought it up, again just so the record is clear.

Whereupon,

ANTHONY M. CALLENDRELLO

DENNIS S. MILETI

MICHAEL C. SINCLAIR

having been previously duly sworn, was recalled as witnesses herein and were examined and testified further as follows:

MR. TRAFICONTE: Mr. Callendrello, you can confirm that the discussion of the hospital, and right now I don't recall which one it is, but the discussion of the hospital and the hospital's morgue that's on the record yesterday is the same use of that morgue that we challenged in the exercise contention that we just discussed; is it not?

There aren't two hospitals using two different morgues.

THE WITNESS: (Callendrello) No. No. It's the same hospital.

MR. TRAFICONTE: So the provision is still in there. The use of the morgue is still being relied on.

THE WITNESS: (Callendrello) Yes, it is. And as we indicated in our testimony, we have got at least some FDA guidance that indicates that a morgue is a suitable location.

THE WITNESS: (Sinclair) I think, furthermore, that it's important to understand that the MS-1 --

MR. TRAFICONTE: Perhaps you should direct those comments to the Board.

THE WITNESS: (Sinclair) When we researched this same issue, we were concerned with the fact that the MS-1 regulations say that the decontamination has to be in accordance with the hospital's protocols.

In the case of St. Joseph's Hospital, the hospital's own protocol calls for using the morgue for decontamination. We simply acquiesced to what the hospital protocol said. We feel that's the most appropriate place to do it.

JUDGE SMITH: I cannot explain that statement in there. I remember it, but I can't explain it. But I know that we do not have any jurisdiction over that hospital. It is just out of our jurisdiction, and I don't know what to tell you. You just have to seek your relief in whatever tribunal occurs to you would be appropriate. But we just

don't have any authority to order that hospital to not to use its morgue for decontaminating its ambulatory patients.

MR. TRAFICONTE: We can appreciate that limit on your jurisdiction. But, of course, the challenge was that their reliance is on a hospital -- they have designated a hospital on which they have relied. And it turns out, as disclosed by the exercise, that that hospital relies on its own morgue.

The contention, of course, challenged that, seeking not that you would order the hospital not to use its morgue, but that you would find that that hospital would be an inappropriate one on which to rely.

You found that wasn't a fundamental flaw.

JUDGE SMITH: Right.

MR. TRAFICONT You additionally, however, agreed with the claim that the morgue was an inappropriate place to decontaminate.

JUDGE SMITH: But the key is why did we find it to be a fundamental flaw.

MR. TRAFICONTE: Not a fundamental flaw.

JUDGE SMITH: Yes, right, that it was not a fundamental flaw.

Was it because it was readily correctable? Or was it because it was not a fundamental flaw in a central part of the plan?

We do not regard the use of a morgue or not the use of a morgue as the adequacy of physically decontaminating people as being an essential part of the plan, a fundamental part of the plan, whether or not it's readily correctable from the standards of 903.

I can't explain that language ordering their correction of that. I don't really have a memory of the rationale that went into that language. But as I sit here today, the Board could not enforce that.

MR. TRAFICONTE: All right, just so the --

JUDGE SMITH: Nor could we admit the contention. The contention was properly rejected.

MR. TRAFICONTE: Just so our appellate record is clear, we had understood until yesterday, at least and I may be the only person with the memory that goes back through the exercise contentions sitting here.

MS. GREER: That's in fact why I asked whether in fact they were continuing to use the morgue and still counting on that in their counting of six per hour as a rate of decontamination.

MR. TRAFICONTE: All right.

Just so the appellate record is clear, we had assumed that from the December order either that the hospital had been asked or requested to find another facility and had done so. Or if the hospital had been

unable to do that, the Applicants would have substituted another hospital. That's what we would have assumed would have followed from your order in December. It turns out that has not taken place.

We just wanted to be clear that the Board is essentially sui sponte reconsidering its December order that the morgue not be relied upon, and that either another facility at the hospital be used, or in the event that's not a possibility, another hospital be substituted.

JUDGE SMITH: For the patients?

MR. TRAFICONTE: For those who would need to be decontaminated in the event of a radiological emergency. That's all we seek.

We assumed that that's what had happened as a consequence of your order.

JUDGE SMITH: What are you seeking? Are you seeking any relief this morning from the Board?

MR. TRAFICONTE: Clarification that sui sponte the Board is going to reconsider its December 15 language and no longer hold or direct the Applicants not to rely on a hospital that itself relies on a morgue to decontaminate the patients.

JUDGE SMITH: Let me say that there are two aspects to it. We considered both of them. Whether the use of a hospital's morgue as a decontamination center for

ambulatory contaminated individuals is appropriate or not does not rise to the level of a fundamental flaw. We adhere to that decision.

We disavow the order in there directing a suitable facility be substituted for want of jurisdiction and authority.

Is that what you are seeking?

MR. TRAFICONTE: Yes.

JUDGE SMITH: I know that's not the result you want.

MR. TRAFICONTE: It's not the result, exactly.

JUDGE SMITH: But that's the declaration you need.

MR. TRAFICONTE: It's not the result we necessarily want, but it's clarification of the Board's present intent, yes.

(The Board confers.)

JUDGE SMITH: All right, Ms. Greer, you have 45 minutes left of your hour. You may proceed.

(Laughter)

MS. GREER: Just for a matter of clarification, I appreciate the opportunity that the Board is allowing me to go back and pick up cross-examination in the one area of my cross plan that I totally skipped yesterday by virtue of time constraints.

Is the Board also allowing me to go back and pick

up questions that I would have gone into further, particularly back in areas 17 and 18?

JUDGE SMITH: My memory of your covering of that is that you did cover the points. Now you are representing to you that you didn't cover them as thoroughly as you wanted, but you did cover the points.

So we are allowing you to continue on that with the caveat that it has to be productive.

MS. GREER: Okay.

MR. LEWALD: Your Honor, I would like to represent that Mr. Sinclair, who was in interrogation yesterday, was looking to certain regulations --

JUDGE SMITH: That's right.

MR. LEWALD: -- in regard to the transportation of children in day care centers. And he now has that reference which Ms. Greer was inquiring about and which he can present.

MS. GREER: Let me find my corresponding papers on this.

(Pause.)

CROSS-EXAMINATION (Continued)

BY MS. GREER:

Q Mr. Sinclair, I'm sitting here looking for my file on this since I was unaware that this was going to come up at this point.

JUDGE SMITH: Why don't you join him, because we are squeezed for time this morning.

MS. GREER: Okay.

BY MS. GREER:

Q Mr. Sinclair, what provisions under the Office for Children regulations were you looking at, if you can give me the cite?

A (Sinclair) The cite is 102 CMR, Section 3.05 which is entitled "Care of Children". And it consists of some 10 subsections, the tenth of which is listed as "Transportation of Children". Under that there are a number of subs, A, B, C, D, and E.

Sub A says, "The licensee shall describe in writing its arrangements for transporting children and provide evidence of required insurance: (1) Each child shall be provided with the transportation necessary for implementing his or her service plan; (2) Appropriate supervision with adequate staff/child ratio for transportation must be maintained; (3) Each facility shall have available, means of transporting children in cases of emergency."

And it goes on. Sub 3 is the one I referred to.

Q If I may just look at that section. I thought it was a different section you were relying on.

(Counsel approaches witness.)

THE WITNESS: (Sinclair) This information is the licensing regulations for group day care centers. That is, those over six; not the family day care centers.

JUDGE SMITH: I did believe that it was improbable that such transportation was required for the family day care centers.

MS. GREER: Yes.

MR. LEWALD: Your Honor, we have copies of that subsection which we could have distributed it if it would be useful to the Board or any of the parties, that Mr. Sinclair was just referring to.

MS. GREER: If I may ask a couple of questions?

JUDGE SMITH: You can get a copy of it over there from Mr. Lewald if it would be easier for you.

MR. SMITH: Is it the Board's pleasure that we distribute it to the parties?

JUDGE SMITH: Sure.

(Documents proffered to parties.)

BY MS. GREER:

Q Mr. Sinclair, isn't section 3 of 102 CMR directed to group care facilities for children rather than group day care facilities for children which are found over in 102 CMR 7?

JUDGE SMITH: What's the contrast you are drawing?

MS. GREER: There is a section under the regulations --

JUDGE SMITH: What was the two terms that you used?

MS. GREER: Okay. 102 CMR Section 3 is for group care facilities for children as opposed to 102 CMR section 7 which is for group day care facilities for children.

The group care facilities, in fact, I believe are applicable to group homes such as New England Home For Little Wanderers, et cetera.

Section 102 CMR 7 is applicable to group day cares.

MR. LEWALD: This is what Mr. Sinclair just advised the Board.

JUDGE SMITH: No. That's not my understanding. He did, but I misinterpreted him. I thought he was contrasting group day care with family day care.

And now the distinction being made is group day care with group care.

MS. GREER: Group care facilities are, in fact, such facilities as permanent homes such as orphanages, foster care group gathering facilities where children are placed on a temporary basis by DSS when taken into their custody as opposed to 102 CMR Section 7 which encompasses the regulations applicable to group day care facilities.

And I believe if you look at 102 CMR Section 7 you will find nothing in there requiring transportation plans.

THE WITNESS: (Sinclair) Your Honor, I'm looking at Section 7 -- 102 CMR Section 7, which Ms. Greer has just referenced to group day care centers. 7.11 sub 9 headed "transportation." Number 9: "Written plan for transportation. The licensee shall describe in writing any plans for transportation of children, including the names of persons authorized to transport children and transportation of children in an emergency."

JUDGE SMITH: I think that if you'll read --

THE WITNESS: (Sinclair) The same reference is in both places.

JUDGE SMITH: If you will read 3.05 of 102 CMR you will see that the section does relate to the housing and the 24-hour care of children as compared to day care.

Now the parts you have read concerning transportation are not as specific and complete as they were under the group care.

Did you search that regulation and make sure you have provided them all, because they are not the same by any means?

THE WITNESS: (Sinclair) That is correct, Your Honor.

The first citation I gave you was for group homes, orphanages essentially.

The second citation which I just read under Section 7.11, sub 9 is for group day care centers.

I apologize for the confusion.

(Document proffered to parties.)

MS. GREER: That's all right.

I have just handed out to the Board -- that's, in fact, the section I thought you were talking about.

BY MS. GREER:

Q But I would ask you, Mr. Sinclair, in reading section 9 doesn't it say there: "The licensee shall describe in writing any plans for transportation of children, including the names of persons authorized to transport children and transportation of children in an emergency."

That doesn't require that they actually have such plans in that section; it only requires that if they do have such a plan that it be in writing?

Notice the word "any." There is, in fact, a

requirement under Section 102 CMR 7.07, subparagraph 14: "That the licensee shall have a written health care policy statement. And the statement shall include in it," over on paragraph (d), "procedures be followed in case of illness or emergency including transportation methods and notification of parent."

That requirement is having arrangements for the transportation of a single child in the event that the child becomes ill, but does not require any general transportation requirements.

A (Sinclair) Ms. Greer, I see them as two separate issues. You are correct, that the one that you just referenced has to do with the tummyache or the toothache problem or the child who falls down on the playground.

I read subsection 9 under 7.11 as meaning you have got to have arrangements and a written plan for dealing with a full scale emergency that involves the entire facility.

Q You may read it that way, Mr. Sinclair.

Do you have any reason to believe that the Office For Children does?

A (Sinclair) I believe they -- in my experience in dealing with day care licensing I believe that certain regulators would read it that way, in the context of, you must have an emergency evacuation plan for such a facility.

Q Do you have any reason to believe that the

Massachusetts Office For Children requires group day care centers to have such a provision?

A (Sinclair) Given the lack of cooperation from the office, no, I have no reason to believe that.

Q Mr. Sinclair, let me just ask you one more question on that point.

Did you ever specifically ask the Office For Children as to its interpretation of this regulation?

A (Sinclair) No, I did not.

Q Returning to Section 19 on the cross plan.

JUDGE SMITH: Wait, before going on to that.

MS. GREER: Okay.

JUDGE SMITH: Mr. Sinclair, it is my view that you have misread that regulation. I agree with Ms. Greer, I think that better reading of the language is that if a group day care facility elects to have transportation for its children it must have them in accordance with the regulation as contrasted to Section 3 where they must have transportation. And that also, of course, must meet the state standards.

MR. LEWALD: Your Honor, we would submit that you really can't read Subsection 9 in isolation; you have to read it with 10. It makes the whole thing a sham. That by some fortuitous event a sham unless there is a requirement, and leave the regulation as a fortuity that a group center

might have a transportation plan.

JUDGE SMITH: Not at all.

A group child day care center may very well advertise and make money on the fact that they run the kiddies around to the zoo and all over the place. And if they elect to do that they have to meet stringent safety standards set out by the state, as compared to a place where these children live and are dependent, where they must have such transportation, which obviously also must meet the stringent standards of the state.

That is my reading of it. And I have to admit that I have not given it the careful consideration, as I sit up in here in the few minutes I have done it. I will do it later on.

Another reason for my reasoning is, here we are, have the same section, Office for Children code and where they believe that it is essential for the facility to have transportation, they state it in uncertain clear terms.

And I see no such certain clear terms in the group day care section. I just believe he is wrong. He misread it. Naturally enough he misread it, but he misread it.

However, let's keep it open and see what you want to do on it.

MR. LEWALD: It says: "Of the office itself created the classic loophole for the group care centers who

didn't want to submit transportation plans."

JUDGE COLE: The group day care.

MR. LEWALD: Group day care, I'm sorry.

JUDGE SMITH: Right. That's how I read it, a group day care center is under no obligation to provide transportation. But if they elect to do so, they better do it correctly. That's the way I read the regulation.

MS. GREER: Okay.

Your Honor, I think just so that the record has some clarification on this point, since I understand that the Board is under no obligation to take judicial cognizance of state regulations, I think I would like to have the document that I have just handed around marked as an exhibit.

And I believe that would be MAG-89.

JUDGE SMITH: This would be 102 CMR, beginning 7.07.

MS. GREER: Yes.

MR. LEWALD: We have no objection, but we would request that the entire section be marked.

JUDGE SMITH: All of --

MR. LEWALD: 7.07.

MS. GREER: You would like -- all right. In which case I will have to, in fact -- I did not copy all of the Section 7 regulations applicable to group day cares. But I

can certainly make arrangements to have the entire Section 7 copied.

JUDGE SMITH: All right. Substitute that.

MS. GREER: And substitute it in.

JUDGE SMITH: All right.

(The documents referred to were marked for identification as Mass AG Exhibit 89.)

JUDGE SMITH: And then I think for completeness we should have Section 05 also in. Section 102 CMR 3.053. I'll read this again on break, but I don't have any difficulty arriving at that interpretation of it.

Who wants to offer 102, Section 3 into evidence?

MS. GREER: Well, if we're only offering it in for purposes of clarification of the record, I'm perfectly willing to have that marked in, too.

That would be MAG-90.

JUDGE SMITH: Yes.

(The document referred to was marked for identification as Mass AG Exhibit 90.)

JUDGE SMITH: Do you object?

MR. LEWALD: No.

MS. GREER: And again, would you like all of Section 3 put in? I think that would probably be appropriate, too, in which case I will make arrangements to have all of Section 3 copied.

JUDGE SMITH: The Exhibit 89 and 90 are received subject to the substitution.

(The documents referred to, previously marked for identification as Mass AG Exhibits 89 and 90, were received in evidence.)

BY MS. GREER:

Q Mr. Sinclair, to pick up on a different topic, can you tell me what arrangements New Hampshire Yankee has made for transportation of contaminated injured individuals?

A (Callendrello) Ms. Greer, I may be more appropriate to answer that question.

Q Okay.

Mr. Callendrello, can you tell me what provisions New Hampshire Yankee has made, in the SPMC, for the transportation of contaminated and injured individuals?

A (Callendrello) We have established an ambulance pool consisting of roughly 89 ambulances presently under contract that are staffed by drivers who are trained in medical emergencies, which involve the treatment of -- the

transportation of contaminated injured individuals.

In addition, there are vehicles -- there's one vehicle at each reception center; a bus at each reception center that can be used to transport individuals who arrive at the reception center and need to be subsequently transported to an MS-1 hospital for treatment.

Q Those 89 ambulances that you mention as being under contract, aren't 86 of those vehicles already assigned specific response functions in terms of having an allocation of 23 of them to provide services to the hospitals; 60 of them to provide services to nursing homes; and three of them to provide services to special facilities?

A (Callendrello) I have trouble with the word "assigned." The planning basis upon which we arrived at an ambulance need was based on those numbers you cited.

They are assigned only in the event that we need to utilize the default values, because we are unable to reach a facility.

So our intention to confirm the transportation needs at the time of an emergency with each facility and supply the appropriate number of vehicles. So the number may be lower. We would expect the number to be lower than 86 because of conservatism that we have built into the analysis.

Q And that conservatism is premised upon the

assumptions that we went into yesterday in your assignment of the default values; correct?

A (Callendrello) Yes.

Q But as a planning basis, totally apart from the four nursing homes -- two nursing homes and two hospitals who do not provide specific data to you on their ambulance needs, and for whom you have then gone about assigning ambulance default values based upon your best judgment -- and by the way, didn't you yesterday say that, in fact, the ambulance needs that you came up with in retrospect, in hindsight, in fact compared fairly favorably with prior assessments and needs; didn't you say that yesterday?

A (Callendrello) Yes, I did.

Q Okay.

A (Callendrello) For the hospitals.

Q So in fact it's reasonable --

A (Callendrello) For the hospitals that is.

Q It's reasonable to assume that the allocation that you've made for ambulances to the hospitals are in fact fairly reasonable assessments of, at least in your point of view, fairly reasonable assessments of the actual needs that the hospital will have; correct?

A (Callendrello) That's correct.

Q And I presume that also the same is true with respect to the nursing homes; correct?

A (Callendrello) I think it's a reasonable planning basis.

Again, in the two facilities where we were not provided information by the facilities we had to make some assumptions, as we discussed yesterday.

Q But in the --

A (Callendrello) It's likely that we have overestimated the ambulance need. At least in my opinion, we likely overestimated the ambulance need. When I look back at the planning work that was done when the state was working with those facilities. The ambulance needs were actually less than that.

Q In fact, for eight of the ten nursing homes weren't the ambulance need assessments premised upon direct conversations that New Hampshire Yankee representatives had with those nursing homes and asked whether in fact how many people would need to be transported in a supine position and medical care along the way?

For eight of the ten that was the planning basis that went into the numbers reached; correct?

A (Callendrello) That's correct.

Q So you have 86 ambulances assigned for response evacuation purposes. You have then one ambulance assigned to each reception center, correct?

A (Callendrello) No, that's no longer correct.

The testimony updates that plan provision and says that a bus is assigned.

Q Okay. But you have a bus and an ambulance assigned to -- you no longer have any ambulances assigned to the reception centers?

A (Callendrello) There is none pre-assigned. That's right.

Q Okay. So at the reception centers you are not planning to have any ambulances. You are only planning to have one bus, correct?

A (Callendrello) We are only pre-assigning one bus.

Certainly as an ambulance finishes its assignment, completes an evacuation of a hospital. Let's say it's going from an EPZ hospital to a host hospital. As that ambulance frees up, there is the capability to contact that ambulance and direct it to a further effort.

If that means going to the reception center and standing by to handle contaminated individuals, that's what we will use the ambulance for. We have got the capability to communicate with the ambulances and subsequently reassign them.

Q Have you done any time runs on how long it will take to have the first and last ambulances complete their assignments of going to the nursing homes and/or hospitals or other special facilities, picking up their passengers, going through reception centers or through the MS-1 hospital for monitoring and for possible decontamination, and then on to host facilities?

Have you done any assessment as to how long for the first and last to complete their assigned rounds?

A (Callendrello) There is an analysis contained in Volume 6 of the New Hampshire plan that does frame, or does bracket the time frame for ambulances affecting an evacuation of those facilities.

I don't believe -- in fact, I'm sure it does not include the time to go through the reception center and then to the host facility. But I know that some will be sooner than others, and it's all going to be within the same time frame as the general population.

Q I understand that, Mr. Callendrello. But we're talking about then having their availability to go on a second assignment. And that's why I asked about first and last.

I take it the answer to my question was, no, you have not done such a time assessment?

A (Callendrello) We've done an assessment of

components of that.

Q So it's unfair to say you don't know when the first ambulance will be in fact available to get back to do a second assignment, correct?

You don't know. You might be able to make some kind of estimate sitting here on the spot. But you don't know based upon any kind of detailed analysis.

Is that a fair statement?

A (Callendrello) That's right.

Q Okay. Now you are familiar with FEMA Guidance Memorandum MS-1, are you not?

A (Callendrello) Yes, I am.

Q Directing your attention to page 3 of that document, the bottom third of the page. Doesn't that provision say, "Each organization shall arrange for transporting victims of radiological accidents to medical support facilities."

Then further on it reads -- do you have that document in front of you?

A (Callendrello) Yes, I do.

Q Okay. This is in fact an exhibit that's been previously marked and entered.

Then reading below, doesn't that say, "The early symptoms of persons exposed to dangerous levels of radiation are usually limited to nausea and vomiting. Ambulances may

not be required to transport such persons to facilities. Rather, nonspecialized public/private vehicles can be used, supported if necessary, with agreements in accordance with A.3 above. For other types of contaminated injured individuals, specialized transportation resources, e.g., ambulances, would be necessary and should be assured by agreements, if necessary, in accordance with A.3 above."

Do you see that sentence there?

A (Callendrello) Yes, I see that sentence.

Q I take it by provision of the one bus, you would maintain that you complied with your requirement for transporting ambulatory people who are not suffering immediate symptoms.

Am I correct in that assumption?

A (Callendrello) No, that's not correct.

We would comply with the first sentence you read. There may be symptoms, but they don't require an ambulance.

Q All right. I think in fact that was my assumption as to what you were premising the one bus on at the reception centers.

But do you maintain that you have complied with the next sentence of that paragraph that says, "For other types of contaminated injured individuals, specialized transportation resources, e.g., ambulances, would be necessary and should be assured by agreements, if

necessary"?

Do you believe that you have complied with that in the SPMC?

A (Callendrello) Yes, I do.

As I indicated, we have the pool of 89 ambulances, the drivers of which have been trained in the techniques of contamination control and in the transport of contaminated individuals. In fact, that was demonstrated in the exercise.

Q In fact, in the exercise weren't certain ARCAs found with respect to the ambulance personnel?

A (Callendrello) Yes, there were. They were just as you characterize it. There were areas which required corrective action. They were not deficiencies.

Q And weren't the ARCAs applicable to the training of those ambulance personnel?

A (Callendrello) One of the two was.

JUDGE SMITH: And didn't we reject that as a contention as a readily correctable item?

MS. GREER: It was an ARCA rather than a deficiency. But it certainly goes to training. And I believe that the reason that it was not found to be a deficiency, at least --

JUDGE SMITH: No. I mean the Board. Didn't we reject that situation as a contention?

MS. GREER: 14-C, in fact, was apparently admitted. I don't have that in front of me now.

BY MS. GREER:

Q Mr. Callendrello, upfront here is my concern. If somebody has suffered enough radiation exposure to actually be symptomatic within a matter of hours after exposure, and that becomes apparent at the receptions centers or at the congregate care centers or at Shriners, my concern is obviously that there are no provisions in the SPMC for transportation of those persons by appropriate emergency service vehicles, such as ambulances.

JUDGE SMITH: Would you show me the contention? Refer specifically to the contention with respect to the training of ambulance drivers.

Wasn't that what the issue was?

MS. GREER: No, I'm sorry. That is an exercise contention.

JUDGE SMITH: Right.

MS. GREER: My question --

JUDGE SMITH: I'm sorry. I misheard you. He said --

MS. GREER: He said --

JUDGE SMITH: He introduced the subject; not you.

MS. GREER: That's correct.

JUDGE SMITH: All right. Okay, that's fine.

MR. TROUT: Your Honor, I'm just wondering whether the Attorney General can point to an SPMC contention or any other contention that alleges that there should be ambulances standing by the reception centers to carry contaminated injured individuals to hospitals. I am at a loss. I can't find one.

MS. GREER: The witness, in his own testimony on this point, referring to --

(Pause.)

MS. DOUGHTY: Mr. Trout.

MR. TROUT: Yes.

MS. DOUGHTY: SAPL, in its trial brief with respect to Contention JI-46, stated, "Finally, SAPL intends to show that the means of transport of general public evacuees to medical facilities are highly insufficient."

Furthermore, the Applicants are claiming that they comply with the MS-1 FEMA directives, and you are resting your case on the FEMA findings. So I think that that's an open area for examination.

MS. GREER: And, furthermore, the witness, in his own testimony at page 58, raised the issue.

BY MS. GREER:

Q Mr. Callendrello, with respect to the bus that has been assigned to each reception conter, would the bus wait at the reception center to transport more than one

individual who was found to be contaminated to the extent that the decision was made that they needed transport to a medical facility?

Would the bus just wait there until it filled up with 50 passengers, or would it go when the first person was assigned to it?

MR. LEWALD: I'm going to object to the question, Your Honor. The hypothetical is getting so vague that it's pretty difficult to get the parameters that's involved in the hypothetical. And what Ms. Greer's conception of what she is asking is one thing. But what Mr. Callendrello's perception of what is being asked might be entirely something different in view of the breadth of the question as put.

MS. GREER: I will be upfront about my concern here.

They have assigned a particular type of vehicle, a bus which can carry many people. But the range that the planners have outlined for monitoring and decontamination of the theoretic 20 percent at the reception centers is supposed to take place over 12 hours.

Are they in fact going to hold the contaminated injured here until the bus fills up, or are they going to take that one vehicle and immediately leave with it?

I am just trying to find out what their provisions

and plans are. They have said at page 58 through 59 of their testimony, running on over to the top of page 60, that they have adequate arrangements for this. And I believe that I have got a right to inquire into actually how it's going to work.

JUDGE SMITH: Overruled.

MR. LEWALD: I'm not challenging her right to inquire into the subject, Your Honor. It was only addressed to the form of the question itself.

BY MS. GREER:

Q Mr. Callendrello, what are the plans?

A (Callendrello) First of all, our testimony describes two sources of vehicles that would be at the reception centers and could provide transportation of persons who arrive who, if I understand your scenario, have been exposed to the point where they are ill.

We've got a bus that's assigned, and we've got personal vehicles of the monitoring and decontamination personnel that could be used. As we said on page 59, that we consider those to be an adequate supply of vehicles.

Further, I think that the section of Guidance Memorandum MS-1 that you read specifically anticipates that for the type of injury you are describing, an overexposure, that nonspecialized public and private vehicles can be used to transport those types of individuals.

Q All right. My question, though, is, are you immediately, when one person or more or a couple of people show up, are you going to send the bus off, or are you going to hold the bus there until you get 50 people?

That's my question. Do you have any plans?

A (Callendrello) There is no specific description, but I can tell you that we would not hold any person who needed medical treatment to wait for a bus to fill up. We would get them to the level of treatment they needed.

If that meant calling 911 to get an ambulance there to get a person to a hospital, we would do that.

THE WITNESS: (Callendrello) We are not going to jeopardize anybody's health just to wait to fill up a bus.

BY MS. GREER:

Q Mr. Callendrello, I appreciate that you would never intentionally jeopardize or even by error, knowingly, jeopardize anybody's health, I appreciate that fact.

But if you went to a 911 call that would be essentially an ad hoc response at that point in time, would it not?

A (Callendrello) It's not ad hoc in my mind.

Q Okay.

A (Callendrello) That's what 911 is for.

Q If in fact you used your second source of vehicles, other than the bus, the personal transportation vehicles of the monitoring and decontamination personnel at the reception centers, who would be driving those vehicles?

Would you take the personnel who are working at the facility to drive those vehicles?

A (Callendrello) It's likely that's who would drive it, yes. It depends on --

Q Would that --

A (Callendrello) It would depend on the situation and what the needs were. If there was contamination control that needed to be maintained, it's likely to be somebody who is trained in contamination control.

If it's simply shuttling an individual, we might seek a volunteer from one of the evacuees and provide them with a map.

Q If you took monitoring and decontamination personnel how many additional extra personnel do you have at the reception center on any given shift to the number who are actually required to do the monitoring and decontamination procedures?

Do you have an extra personnel --

JUDGE SMITH: We had a rather lengthy cross-examination on that very subject, you know, on the personnel at the monitoring and decontamination centers. How many and the extras and all that type of thing. I don't want to go through it again, in the short amount of time that you have.

MS. GREER: Okay.

BY MS. GREER:

Q Mr. Callendrello, what would you, as a prudent conservative planner, consider a reasonable margin of error in vehicle assignments such as for transporting monitoring and decontamination personnel?

A (Callendrello) I don't understand the question.

Q In connection with the assignment of vehicles for other functions in the SPMC you have under contract certain extra number of vehicles in addition to those that have an assigned need requirement.

Is that not the case?

A (Callendrello) Yes. We have contracted for vehicles in addition to or over and above what the planning basis is.

Q And with respect, for instance, buses, you maintained that you contracted for, I believe it is, 561 and you have a need assessment of 367, which gives you a margin for error of approximately 40 percent.

Is that roughly the figures that you're operating on?

A (Callendrello) We have contracted for actually more of that. We have contracted for 625. The number you cited is based on invoice information, most current invoice information.

Q Okay.

But essentially, you've got a margin for error there of approximately 40 percent in that figure, do you not?

A (Callendrello) What I have a problem is defining "margin of error;" I consider that a surplus.

Q Okay.

You've got a surplus of approximately 40 percent in that figure, do you not?

A (Callendrello) Yes.

Q And it's fair to say that for ambulances you have

no such surplus figure built in, do you?

A (Callendrello) We have some small surplus, as I indicated, based on the contracted numbers.

If you look at the invoice numbers it is actually more than that; we're up around 97 ambulances. And again, ambulances is one of those resources where, as I indicated yesterday, there is a large pool, roughly twice what our needs are, that are out there in companies -- belonging to companies that would not or could not participate.

Q I know, Mr. Callendrello. But didn't we go into this yesterday, and again, at that time you said that you had no time estimates on their response times; correct?

A (Callendrello) I gave you an estimate based on their travel distance.

Q Okay. But beyond that, that's just your estimate of how long it takes to drive a given distance; right?

A (Callendrello) Yes, it is.

Q And typically that would only be, in emergency planning, one portion of a response time for an emergency vehicle, would it not?

A (Callendrello) That would be one part of the --

Q Okay.

JUDGE SMITH: You have 20 minutes remaining, Ms. Greer.

MS. GREER: Okay. I have now finished up my

questions in that portion. If I may use that 20 minutes to go back.

JUDGE SMITH: Yes. Certainly.

BY MS. GREER:

Q Directing your attention to page 36 of your testimony, in the middle of the page there. You say that -- in the middle of the paragraph, second sentence of that middle paragraph which begins: "Facility specific instructions for special facilities with regard to the implementation of effective sheltering are not required or necessary."

And then you go on to say: "Instruction for sheltering are generic. Practical sheltering instructions are contained in the generic EPZ hospital plans developed for each of the facilities. And these basic instructions are also provided to hospital officials by the special population liaisons during emergency notification process."

Do you know what the instructions are with respect to the Anna Jacques Hospital for sheltering?

A (Sinclair) Are you referring to the instructions that are in the plans we prepared for them?

Q Yes?

A (Sinclair) Give me a moment.

(Witness reviews document.)

THE WITNESS: (Sinclair) Section 3.4.3 of the

plan reads: "If sheltering is recommended remain indoors with all doors and windows closed. Have maintenance and engineering adjust heating ventilation or air conditioning systems where possible to minimize the intake of outside air."

And there's a footnote: "HVAC systems should not be shut down unless specifically directed to do so by local civil defense agency or New Hampshire Yankee ORO special populations coordinator."

Q With respect Anna Jacques, am I correct in having heard you now that you are not recommending moving the patients in any way for the purposes of sheltering, you just plan to have them stay in their hospital rooms?

(Witness reviewing document.)

THE WITNESS: (Sinclair) I apologize for the delay.

The plan is in two sections and I just wanted to check both sections to make sure there wasn't a reference.

I don't find that reference to moving patients from their rooms in this plan.

BY MS. GREER:

Q In making the determination that's implicit in that plan that the patients will be sheltered in their rooms, did New Hampshire Yankee do any assessment as to the sheltering factors that are available in Anna Jacques

Hospital?

If you don't move them; you just keep them in their rooms?

A (Callendrello) No.

We've done no hospital-specific evaluation of its dose reduction factors.

Q Did you do any assessment even of how much of the external walls are, in fact, glass?

A (Callendrello) No.

There has been no formal evaluation. Both Mr. Sinclair and I have been to the facility and looked at the facility.

Q Okay.

A (Callendrello) There has not been a formal evaluation as to how that affects dose reduction factor.

Q With respect to the paragraph that follows that -- that central paragraph on page 36 which begins at the bottom: "The direction to shut down fans, heating, and air conditioning specifies the actions with regard to those systems which use air drawn from the outside."

And then goes on, essentially how you would go about shutting down air intake systems.

And you go on to say that: "Virtually all heating and air conditioning systems in current use in health care institutions provide for recirculation of ambient air."

My question is, do you know if in the evening shifts or night shifts or nighttime shifts of nursing homes whether there are, in fact, maintenance personnel there capable of performing those shutdown functions?

A (Sinclair) I don't know specifically on an institution-by-institution basis. Some of the larger homes have maintenance people available on-call. Most of the smaller ones do not have anybody on duty at night.

I would also point out that in most of the nursing homes that I'm familiar with the emergency procedures with regard to fires call for shutting down the ventilation systems when the fire alarm goes off, if the system, in fact, doesn't shut down automatically. And most of the staff charge nurses are shown how to do that. It's a power switch that is just turned off some place in the building.

Again, I'm referring to some of the larger facilities as opposed to some of the smaller institutions.

Q Directing your attention over to page 38 which is under the section, "School protective actions."

Am I correct that in connection with school protection actions you have assigned the school coordinator to directly contact the superintendents of the various school systems?

A (Callendrello) Yes, that's correct.

Q What is the purpose of that contact? Simply to

advise them that they are to be the link to New Hampshire Yankee?

A (Sinclair) No.

The superintendent has the administrative jurisdiction for the school district. The purpose is to ensure that he is on-board and understands the nature of the emergency and to establish the communications link that ultimately might be used to discuss protective action recommendations for the district.

Q Okay.

I take it, it is not to discuss -- at least from what I just understood you to say -- it is not to discuss transportation arrangements that -- in terms of getting an assessment on the day of the emergency; that's not the purpose of the contact?

A (Sinclair) I think you have to understand that the transportation arrangements for most of the school districts are made through the superintendent's office.

There are two points of contact during an emergency. One is with the superintendent who has the administrative responsibility for the district.

The second is with the individual school building principals who have, as of that moment, the most current data on attendance of the schools.

We need to know how many students and faculty are

in the building at that time in order to accurately determine their transportation requirements.

We need to have contact with the superintendent to determine whether or not he has transportation available to the district, through the contractors.

Q In fact, in the procedures that you have for the school liaisons, it's the function of the school liaison to ask the principals.

Reading IP-2.7, Amendment 6, Attachment 1 headed "School Protective Action Message," it says that the school liaison is supposed to tell the principal: "At this time we would like to verify your transportation requirements in the event of an evacuation. Our records indicate that blank number of blank vehicle types are required. Is this information accurate?"

Am I correct in reading that, that in fact you are planning to verify transportation through the principals rather than through the superintendents?

A (Sinclair) Transportation requirements.

The key word is "requirements." How many students do you have in the building at this time and how many buses would you need to move them.

Q Okay.

A (Sinclair) The feeling is that --

Q And then --

A (Sinclair) Excuse me.

Q And then reading on in that same school protective action message, doesn't the school liaison, theoretically, go on to say: "We will have the vehicles you identify dispatched to your school to standby for possible evacuation to support your immediate evacuation."

That's what the protective action message says, does it not?

A (Callendrello) Yes, it does.

Q And that same protective action message is applicable to both private schools and to public schools; correct?

A (Callendrello) Yes.

Q And in private schools, of course, the private institution would typically be responsible for the transportation requirements; correct?

A (Callendrello) Directly, right.

They would not have a superintendent.

Q And at least with respect to the plan, the procedures in the plan -- the procedures make no distinction between public and private schools; correct?

A (Callendrello) No, that's not correct.

As Mr. Sinclair indicated, the coordinator -- the school coordinator would contact school superintendents.

Q Okay.

A (Callendrello) There is no comparable position or no comparable contact between the school coordinator and somebody in a private school. It would be done through the school liaison.

Q In the procedures for the school coordinator is there any particular reference to arrangement of transportation?

A (Callendrello) Yes, there are several places where there are discussions of transportation.

The school coordinator receives a briefing on the transportation needs of the various schools. Receives that briefing from the school liaisons. The school coordinator passes that transportation need to the bus company liaison.

And again, the school coordinator would notify the school liaisons when he gets the information of the bus company -- of the bus estimated times of arrival.

Q But nowhere in those procedures does it actually make reference to the coordinator gathering the information from a superintendent as to transportation availability; correct?

A (Sinclair) No.

That information would come to the school coordinator based --

Q Through the liaison?

A (Sinclair) -- through the liaison.

Q Right. I understand.

A (Sinclair) And with regard to the need.

Q Looking over to page 42 of your testimony, in the middle of the page there you say: "Implementing a protective action recommendation for any public school facilities is the responsibility of the school district superintendent or in the case of a privately operated facility the facility administrator."

By that do you mean the decision to implement any given protective action is left to either the superintendent or the facility administrator of a private school facility or do you mean the implementation?

A (Sinclair) One follows the other.

We make a protective action recommendation. Whether or not that recommendation is accepted and how it is implemented is the responsibility and the jurisdiction of the responsible official.

Q Okay.

We went into this yesterday with respect to special facilities. But I will be upfront to shorten things up because I am now finding that I am one minute over my allotted --

JUDGE SMITH: Now, you have until 20 after.

MS. GREER: Five minutes.

Okay.

JUDGE SMITH: Five minutes.

BY MS. GREER:

Q As we went into yesterday with special facilities, are there any particular -- typically the choices that would be available would be the choice between sheltering or evacuation.

And my concern is, obviously, that the information available to the superintendents in making that decision or to the private day care personnel in making that decision would not be readily available, and New Hampshire Yankee has no particular provisions in the plans for making that information available.

To cut this short, with respect to the school procedures are there any different procedures that would make that information anymore available than they were for the special facility procedures?

A (Callendrello) For the choice of protective actions it is -- the process is the same as I outlined yesterday, where the offsite response director or through his assistant director would make a recommendation to the governor or his representative. The governor would evaluate that, come back with an agreement or nonagreement or different protective action. And ORO would be prepared to implement and pass along that recommendation to the affected schools.

So we wouldn't be asking the public school superintendent to do a protective action recommendation calculation. We would be passing it on.

Schools are somewhat different than other special facilities in that they may elect to -- and the SPMC contains provisions for evacuating them at an early stage. A precautionary evacuation.

Q Right.

But just looking at a standard choice between, let's say, early evacuation for one reason or another is not an option, but essentially the choice comes down to sheltering or evacuation.

Am I hearing you correctly that there are no different procedures for providing the superintendent information as to the relative dose savings of those two protective action choices than there were for special facilities?

No different procedures, are there?

A (Callendrello) I don't understand the question.

Q Okay, that's fair.

Yesterday, we went through a series of questions and a series of answers where I expressed a concern that special facility administrators would not have enough information to make an informed decision as to whether to shelter their patients or residents as opposed to evacuating them, because they would not know the relative dose savings between those two choices.

My questions was with respect to the procedures for school liaisons, school coordinators and on up that chain of response.

Are there any procedures that are different that will in fact make that kind of information available to schools that was not available to special facilities?

A (Callendrello) We do not ask the school superintendents to make that decision based on a dose savings calculation, nor did we ask or do we rely on the special facility administrators to make that decision based on some kind of a dose calculation.

As we said yesterday, a special facility's administrator may have a concern and may choose to implement some different protective action because of a medical consideration. And when it comes to the radiological considerations, we would put them in touch with somebody in

the ORO who could provide that information.

Schools doesn't have that added element. It doesn't have the medical consideration element. So for schools it's relatively straight forward.

Q Okay.

A (Callendrello) We make the recommendation to the Governor. The Governor, through his radiological advisors, would evaluate that and determine whether that's the appropriate protective action to be taken based on, of course, one element being dose savings.

Q Okay. Those dose savings decisions are based, though, for the general population, are they not?

There is no specific decisionmaking, particularly for schools, under the SPMC, is there?

A (Callendrello) That's not correct.

There are precautionary actions taken.

Q There may be precautionary actions. But in terms of a general recommendation, the general recommendation that comes down from New Hampshire Yankee to the Governor, and from the Governor back, am I correct in believing that school population is viewed as being part of the general population for the purposes of the SPMC, PAR decisionmaking?

A (Callendrello) For the scenario you have outlined where there has been no consideration --

Q Right.

A (Callendrello) -- of precautionary actions, they would be treated as part of the general -- they would be considered along with the general population.

Q Okay. Now you have said that, with respect to special facilities, there may be a medical consideration.

My question to you is that aren't children, particularly small children such as you might find in day care, infants, aren't they in fact more susceptible to dose consequences than the general population?

Yes? No?

A (Callendrello) They are, and the calculations that we do consider that.

Q Do you provide any additional --

JUDGE SMITH: Would you conclude your cross-examination as readily as possible, please?

MS. GREER: Okay.

BY MS. GREER:

Q Is it fair to say that there is no particular procedure for making special protective -- other than early release or for some early procedure, early intervention procedure -- that there is no particular decisionmaking that's applicable to schools and day care centers under the SPMC?

Is that a fair statement? Unique from the general populace.

A (Callendrello) Discounting the early actions, that is correct.

MS. GREER: Okay.

JUDGE SMITH: All right.

Ms. Doughty.

MS. DOUGHTY: Yes, Your Honor.

I'll distribute the cross-examination plan to the Board.

(Document proffered to the Board.)

CROSS-EXAMINATION

BY MS. DOUGHTY:

Q Good morning, gentlemen.

Mr. Sinclair, I would like to address a few questions for you. We didn't have a chance to do a deposition and I want to get an understanding of where you and your firm fit in the overall emergency response picture.

In your vitae, it states that you are an emergency planning consultant with Aidikoff Associates. And the next sentence states that you are a subcontractor.

And I am wondering to which entity you are subcontracted.

A (Sinclair) To Aidikoff Associates.

Q Oh, I see. You are a subcontractor to Aidikoff.

A (Sinclair) Yes.

Q Is Aidikoff, how is that connected to the New

Hampshire Yankee organization?

A (Sinclair) Aidikoff is contracted to New Hampshire Yankee.

Q I see.

A (Sinclair) For planning support, planning and litigation support.

Q Now, is Aidikoff based in Syosset, New York?

A (Sinclair) Yes.

Q Could I ask how many employees there are?

A (Sinclair) I believe eight or 10 at the most.

Perhaps it might be helpful to you to understand that most of the people who work with or for, if you wish, Aidikoff Associates are independent consultants. Aidikoff is essentially a consortium of independent consultants who have gotten together for the purposes of offering services to the nuclear industry.

Q I see.

And what other nuclear sites has Aidikoff contracted to do work?

A (Sinclair) I'm familiar with Shoreham, work at the Shoreham facility. But other than that, I don't know.

Q Do you know whether or not there is a phone number listed in Nassau County for Aidikoff Associates, a business phone listing?

A (Sinclair) I have a phone number, yes. I don't -

have it immediately available, but I would be happy to provide it for you.

Q The directory assistance tells me there is no listed phone number for an Aidikoff Associates in Nassau County. And I was just wondering if you could explain why that is.

I tried to different directory -- somebody can always make a mistake, so I tried twice with two different operators.

A (Sinclair) The company is operated by Mr. Brant Aidikoff who is here if you would like to ask him.

JUDGE SMITH: Are you just trying to get the phone number?

Can't you do it without -- would you give her the phone number?

(Phone number proffered to counsel.)

MS. DOUGHTY: Well, I had asked for a firm resume or a brochure from counsel for the Applicants, and they weren't able to provide one. So I am interested in this firm in what area of emergency planning expertise.

JUDGE SMITH: As you know, we have a very, very busy week, and you are taking hearing time unproductively.

BY MS. DOUGHTY:

Q Mr. Sinclair, if there were a radiological emergency at Seabrook, are you under contract to provide

services during the actual emergency, or is your role confined to planning in advance?

A (Sinclair) Presently I am in the planning division, licensing support division, planning division.

Q I see.

So you would not necessarily have a role if there were a radiological emergency at Seabrook station?

A (Sinclair) I am not an assigned responder, no.

Q I see.

JUDGE SMITH: Are you done with this line now?

MS. DOUGHTY: Yes.

JUDGE SMITH: All right.

BY MS. DOUGHTY:

Q Mr. Callendrello, yesterday, in response to some questions from Ms. Greer, you stated that the philosophies for evacuation and sheltering choices differ between the States of New Hampshire and Massachusetts.

And I was wondering if you could elucidate on those differences and philosophy.

A (Callendrello) I'm sorry. I'm drawing a blank and I am mentally searching the transcript to try and --

MR. LEWALD: Well, I think there has to be a premise. What basic differences in philosophy?

JUDGE SMITH: She alluded to testimony to that effect which I don't especially recall.

MS. DOUGHTY: This came up in the discussion of dose reduction factors. And Ms. Greer was mentioning that in New Hampshire they had surveyed the buildings and derived dose reduction factors for the buildings in New Hampshire special facilities such as nursing homes. But that hasn't been done on the Massachusetts side, I believe was the testimony yesterday.

BY MS. DOUGHTY:

Q Is that correct?

A (Callendrello) That is correct.

Q And I think in the context of that general conversation, it's my recollection that you stated something to the effect that the philosophies between choices for evacuation and sheltering differ between the two states.

So I was asking if you could elaborate on those differences in philosophy.

A (Callendrello) I don't think it's a difference in philosophy. I think the New Hampshire Department of Public Health Services people wanted to have that additional information on hand in case a question came up from a facility.

They also wanted to have it so if they felt they had to, they could do a separate protective action calculation based on the particular characteristics of that facility.

Q Which approach do you feel provides better public protection?

A (Callendrello) If I understand the choices --

MR. LEWALD: I don't know that Mr. Callendrello has finished his answer. He has given the New Hampshire side, and I don't know that he said anything about the Massachusetts side, although I guess we all know they are nonparticipating.

MS. DOUGHTY: I'm sorry if I interrupted.

THE WITNESS: (Callendrello) The Massachusetts protective action decisionmaking process, as I explained yesterday or the day before, considers the entire population of an affected area, an emergency response planning area. It does not discriminate between general population and those in special facilities.

BY MS. DOUGHTY:

Q On the Massachusetts side, though, you have testified, and I believe it's in your testimony, that the special facility operator can choose between protective actions based on his judgments as to the medical needs of the residents?

A (Callendrello) I testified that ORO is prepared to make a recommendation to the Governor. The Governor, we presume, will act on it or arrive at a different recommendation based on his advisors. We are prepared to

implement that.

But ultimately the facility administrator has responsibility for the health and safety of those individuals in their charge. And if there are medical considerations that raise an issue in their mind of whether they should implement the protective action, we are prepared to support that choice.

Q Reading from pages 33 to 34 of your testimony at the bottom, it states, "Therefore, the specific dose reduction factors of these facilities are not used to choose the protective action."

Does that give an informed basis for making a choice between the protective actions of evacuation and sheltering if the facility administrator doesn't know about the protection to be afforded by the structure that the residents are in?

A (Callendrello) There is two different types of decisions that are made.

There is one made based on plant conditions or radiological conditions. That's an evaluation that's performed by ORO and passed through the chain to the Governor and back, and a recommendation, approved recommendation made to the facility.

There may be a second recommendation, or second evaluation performed based on concerns or constraints raised

by the facility administrator based on a medical consideration.

And in that regard, as I indicated again yesterday, we would make appropriate people available to discuss any other considerations with the facility administrator.

Q Okay. Now in order to know whether doses are going to be dangerous or, for example, for a nursing home you might just think it might contribute to some more latent cancers down the road some, you need to have some idea of the sheltering capability of the structure, don't you, to know what the level of dose is going to be given the release from the plant?

A (Callendrello) That type of assessment would be useful, and that can be done at the time. Health Physicists, a trained health physicist can very quickly come up with a dose reduction factor based on the facility administrator's description of how it's built.

Q Is that the best way to arrive at a dose reduction factor?

Wouldn't it be better to have someone go and inspect the facility first, someone who is trained in that area?

A (Callendrello) I think that the increase in precision or accuracy is probably slight.

JUDGE SMITH: Mr. Callendrello, if an administrator of a special facility were to ask New Hampshire Yankee to advise them early, say tomorrow, on the dose reductions factors of their facility, would you accommodate them?

THE WITNESS: (Callendrello) Absolutely.

BY MS. DOUGHTY:

Q Mr. Callendrello, isn't it an ad hoc response to wait until the time of the accident to make a determination about the characteristics of the facility?

A (Callendrello) I wouldn't characterize it as ad hoc. The organization exists. There is flexibility in the organization to accommodate variations of protective actions. Whether that's defined as ad hoc, I don't consider it ad hoc.

Q But it is certainly something that could be done ahead of time as part of the planning process, is it not?

A (Callendrello) As His Honor mentioned, if the facility administrator wishes to participate in planning, we will be more than happy to sit down with them and do a facility-specific evaluation.

JUDGE SMITH: Has that information been made available to facility administrators?

THE WITNESS: (Callendrello) We have made a number of contacts with the facilities in writing, asking

their cooperation in planning. We started in August of 1987 with letters to all the facilities. We repeated that in March when we again offered planning, training and ability, or the opportunity to participate in the exercise. And we will continue to make those contacts.

BY MS. DOUGHTY:

Q There is nothing that would prevent an external survey of the buildings in the zone to generally characterize them as to type at this point in time, is there?

A (Callendrello) That would give some of the information. I don't think it would give the complete picture. But that would give some of the information, yes.

Q Okay, thank you.

JUDGE SMITH: Are you moving on?

MS. DOUGHTY: Yes.

JUDGE SMITH: Well, what have you established?

MS. DOUGHTY: That they haven't made any effort at all to determine what the dose reduction factors are of the special facilities.

JUDGE SMITH: They haven't gone as far as they could have.

MS. DOUGHTY: That's right. Yes.

JUDGE SMITH: Even given noncooperation.

MS. DOUGHTY: Right.

And that furthermore, there is this unaccounted for discrepancy between the approaches in Massachusetts and New Hampshire. Somewhat accounted for by the noncooperation of the facility administrators, but not entirely.

JUDGE COLE: Mr. Callendrello, what was the trigger for your moving forward and evaluating buildings with respect to protection factors; their response with respect to planning; they did not respond to your request to plan with them; then you didn't do anything further?

THE WITNESS: (Callendrello) As I mentioned, the philosophy for reaching protective action doesn't involve a facility specific protective action determination.

Obviously, if an administrator had a concern because they know on a routine basis they have people who

are just difficult to move. The only way we can find that out is by talking to them and working with them in a cooperative manner to plan.

And in that case if they pre-identified a problem or a concern we would work with them to pre-identify a sheltering consideration or sheltering option.

JUDGE COLE: Now your approach was considerably different in the State of New Hampshire. And is it correct that that was because that was at the request of the official from the State of New Hampshire?

THE WITNESS: (Callendrello) Yes.

JUDGE COLE: Thank you.

MS. DOUGHTY: Just prompted by an answer that Judge Cole elicited.

BY MS. DOUGHTY:

Q If you were making a choice about a difficult to move patient, if they were going to be left in a wood frame structure versus a solidly constructed, heavy stone structure, you might make a different determination as to making that extra effort to move the person, might you not?

A (Callendrello) That's only one of the inputs. I can't answer, yes or no, to that because it would depend on the dose rates; the age of the patient; what the health effects would be.

Q But it is a necessary input, is it not?

A (Callendrello) It's one of the inputs, yes.

A (Sinclair) We already had information regarding the structural characterizations of almost all of the special facilities in the EPZ.

So that information is available, should the question come up.

In addition to being able to get it from the administrator at the time the question is raised, we have gathered that information independently as part of the surveys of those facilities. We simply have not carried it to the point, as Mr. Callendrello indicated, of actually determining a dose factor for each building.

Q But is this information anywhere in the plan, where it's available to the person who might be fielding the phone call from the special facility?

A (Sinclair) Not at the moment it is not. No.

JUDGE COLE: Are you saying, Mr. Sinclair, that you have an overall characterization of the protection factors that would be afforded by typical buildings in the area?

A (Sinclair) Specifically by building, no.

What I'm suggesting to you is, part of the planning process of evaluating each one of the special facilities, we have looked at each one of the facilities. We know what the basic exterior construction of each of the

buildings and the configuration of each one of the buildings is.

That information will be inputted into the process. It is still in the planning documents, working documents, if you wish, at the plan at the time.

We found no need for it since the basis in the plan currently is to make a protective action recommendation throughout the ERPA without regard to individual special facilities.

If at some point in the future the question comes up as to doing it on a specific facility basis, we have gathered some of that information already.

JUDGE COLE: Yes, but doesn't the overall decision-making process involve a knowledge of the types of structures that are out in the EPZ?

THE WITNESS: (Sinclair) Yes.

JUDGE COLE: And you have that information. It is inputted into the decision-making process.

THE WITNESS: (Sinclair) I guess I draw a distinction between whether it's immediately available to the ORO offsite director in making his decision versus is it available currently to the planners who are working with the facilities.

It is still at the planning level. It is not part of the formal SPMC process.

JUDGE COLE: Thank you.

BY MS. DOUGHTY:

Q Now I would like to ask some questions to follow-on some questions that Ms. Greer asked about monitoring special needs persons at the reception centers.

Mr. Callendrello, is IP-2.9 that lists the number? I don't want to belabor this a whole lot as Judge Smith has already indicated, we have gone over numbers of personnel of the decontamination centers quite extensively already. But I just want to get this little point.

It would be IP-2.9, Section 5.2.9(b). Now would it be sub. No. 4 under there that would be the people that would monitor and decontaminate the special needs people?

A (Callendrello) They would be the persons to monitor the individuals, yes. Monitor and decontaminate.

Q So they would be responsible for both functions?

A (Callendrello) Yes.

Q Now your testimony states, I believe it begins at the bottom of page 52 and continues on to the top of page 53.

And it says: "If contamination is found on special needs evacuees decontamination is performed in this special vehicle by monitoring decontamination personnel under the director of the monitoring and decontamination leader at the reception center."

A (Callendrello) Yes, it says that.

Q Would you agree that the kinds of decontamination that could be done when someone is sitting in a vehicle are fairly limited. For example, you can't shower somebody when they're in the vehicle, if they had whole body contamination?

A (Callendrello) That's right.

You could do local decontamination using a variety of techniques: wash cloths; other types of cloth. You couldn't, obviously, shower somebody inside a vehicle.

Q Have you derived any time estimates per person?

A (Callendrello) We have derived an estimate for the monitoring of individuals of 70 seconds per individual.

Q The plan provides for sending people on to MS-1 hospitals for further processing if they can't be decontaminated at the reception center; is that correct?

A (Callendrello) Yes. With the exception of some individuals who may have internal contamination, they may be entered into the radiological screening program in accordance with IP-2.9.

Q Okay. Maybe I'll get back to that point in a minute.

But say someone that needs to be -- you don't know -- you have someone drive in, in a special needs vehicle, and you monitor them. You determine that they are

contaminated. Before you would know whether you were going to need to send them on for further processing you are going to have made an attempt to decontaminating them there, in some instances, is that not correct?

Or how will you determine that someone is so contaminated that you're just going to need to send them on?

A (Callendrello) When we perform monitoring and decontamination functions there is a feedback mechanism. You monitor an individual and you determine whether somebody has been contaminated. Usually it's spot contamination: feet; hands; head; something like that.

And you perform local decontamination. If after repeated attempts you are unable to decontaminate somebody because they have got internal contamination -- if it's internal contamination there is not much you are going to be able to do to decontaminate somebody; so you would enter them in a screening program to make sure you do follow-up or do a whole body analysis.

If it is contamination -- widespread contamination that can't be removed by local decontamination techniques, you would make whatever arrangements are appropriate and that may mean sending them to an MS-1 hospital.

Q Where do you draw the line between determining that someone just needs to be put into a screening program versus someone that needs to be sent on to a hospital? How

do you make that determination? What guidelines?

A (Callendrello) It's, again, in IP-2.9.

JUDGE SMITH: We'll take our mid-morning break. Ten minutes.

(Whereupon, a recess was taken.)

JUDGE SMITH: Proceed, Ms. Doughty.

MS. DOUGHTY: Thank you.

BY MS. DOUGHTY:

Q Mr. Callendrello, I think when we left off we were trying to determine how you make a decision when it's been determined that somebody is contaminated and a decontamination attempt has failed and they are in a special needs vehicle.

How do you determine whether to put them in a tracking program or to forward them on to a MS-1 hospital?

What are your criteria for making that choice?

A (Callendrello) There are general criteria for the monitoring decontamination leader, and it's IP 2.9, Section 5.2.16, which says when individuals have contamination which cannot be removed after three decontamination attempts or are suspected of having internal contamination, e.g., individuals with contamination around the nose and mouth, there is two steps that are indicated: (a) Notify the radiological health advisor; (b) obtain the contaminated individual's name, social security number, address, telephone number and provide the information to the radiological health advisor for entrance into the radiological screening program.

So it's likely that for -- and that covers anybody in the general public. Now, somebody in a special vehicle

where you can't perform a full body decontamination, there may be another consideration, although that's not explicitly addressed in the procedure.

Q Okay. But does this procedure help someone determine how to make the choice between just putting them into a radiological screening program or sending them to an MS-1 facility for further medical treatment?

A (Callendrello) It does in that if it's an individual -- the person gets into the screening program if the contamination can't be removed after three attempts.

If it's a type of contamination that can't be removed because of, as I said, because it would require a full body shower or something, you are not able to make three attempts, obviously, so that would be the kind of trigger that would trigger the monitoring and decontamination leader to send this individual to another facility, an MS-1 hospital for decontamination.

Q Okay. To digress to a general public evacuee for a moment. Say there has been three attempts for a general public evacuee, nonhandicapped.

Has any medical authority confirmed for the ORO that that's an acceptable procedure, to just put them in a screening program without having them first go to a medical facility?

A (Callendrello) I don't know if any medical

authority was consulted.

Certainly persons who are experts in health physics and radiological health effects were involved in the development of these procedures and the implementation of these procedures. So I am sure that these are standard health physics practices.

Q Could you identify for me who said that it's okay not to have the person be checked in a medical facility after they are still contaminated before putting them into a screening program?

A (Callendrello) I know that at least one of the implementors of this procedure is Peter Littlefield from Yankee Atomic, who is highly experienced in health physics. And I know that Yankee Atomic has been involved in the review of these procedures. Other than that, I don't know of any specific individuals.

Again, the preparers of these procedures are persons who are experienced in health physics practices.

Q Okay. But no medical people were consulted. I think that was your answer just to make the record clear.

A (Callendrello) That's right. Well, I don't know if there were any medical people consulted. And again, I don't know what medical people FEMA may rely on in its RAC review of these procedures.

JUDGE SMITH: When you refer to medical people,

you are excluding health physicists, and you're talking about medical doctors?

MS. DOUGHTY: Yes.

JUDGE SMITH: Medical doctors?

MS. DOUGHTY: Right.

BY MS. DOUGHTY:

Q Now earlier, Mr. Callendrello, I heard you say something to the effect of if people are spot-contaminated like just something on their hands or on their feet, that they could be washed off.

Isn't the expectation that people would just have spot-contamination sort of generated out of what generally happens in the nuclear industry when somebody is working in a nuclear power plant and they are touching things or walking over surfaces with deposited contaminants?

But that's not the kind of situation that prevails in a radiological emergency when, for example, someone sitting in a wheelchair waiting to be loaded onto a bus to be transported somewhere, and a plume passes overhead.

You wouldn't expect that same pattern of contamination, would you?

A (Callendrello) For that specific scenario where you have got somebody sitting outside while a plume is passing over containing contaminants, there would be more than just spot-contamination.

I don't think that that would happen. I don't think that would be our recommendation to have somebody sitting out there while a plume passed over filled with contaminants.

But in the scenario you described, that would be more than spot-contamination.

Q In this kind of scenario people might have contaminants in their hair and deposited all over their clothing and probably on their hands and face, possibly.

A (Callendrello) For that scenario, there could be a number of areas that would be exposed.

Q Now how can that be avoided if a plume is going overhead and you have to evacuate people, how are you going to avoid bringing them outside to load them into an evacuation vehicle?

Isn't it reasonable to expect that there is going to be that kind of contamination?

MR. LEWALD: I'm going to object to the question, Your Honor. The premise is one that was hypothetical, and now the question treats this as though it were a fact.

MS. DOUGHTY: It's a realistic hypothetical, I believe.

JUDGE SMITH: Well, she --

MR. LEWALD: To have somebody sitting in a wheelchair waiting for a bus?

JUDGE SMITH: Just a minute, Mr. Lewald.

She asked at the end of the question, isn't it reasonable to expect such contamination. Now, if it's not reasonable to expect it, then I don't think we have to worry about it. If it is, well, then, maybe we have to worry about it.

I think he has already suggested that he doesn't think that that is a likely scenario. But let's hear his answer.

MR. LEWALD: Well, I think the question already assumes as a fact that you have somebody in a wheelchair waiting for a bus that gets contaminated. Now what are you going to do about it.

JUDGE SMITH: At the very end she put it, isn't it reasonable that that scenario would occur, as I understand it. And it is not an artfully worded question for cross-examination.

But is it reasonable? Would you expect that to happen?

THE WITNESS: (Callendrello) No, Your Honor.

JUDGE SMITH: All right.

BY MS. DOUGHTY:

Q Well, Mr. Callendrello, if there were a plume going overheard and if you had people inside a nursing home and a bus pulled up to a loading dock, and the people had to

be wheeled out and there were deposited contaminants coming down, how could you avoid having people becoming contaminated?

A (Callendrello) By not moving them out into the bus until the plume has passed overhead. It's a technique known as sheltering, followed by relocation.

Q What if the projected plume passage time is of hours' duration?

A (Callendrello) You can't make that kind of a decision based on the single parameter you have given me of there is a plume passing over that has contaminants. There are many facets to the decision: plume exposure duration time, the dose rates, the level of contamination.

I can't give a simple answer to that kind of a question.

JUDGE SMITH: The problem is here Ms. Doughty is, unwittingly, I'm sure, religitating the whole issue of sheltering versus evacuation and that type within the narrow context of these people. And I think you have just pretty well exhausted it.

MS. DOUGHTY: Well, I just want to see if they have a realistic provision for the kinds of contamination problems that would wind up at their reception center.

JUDGE SMITH: Every answer they give you, you come up with a new, bigger scenario, worst one, and I am sure

that your imagination will enable you to come up with even worse yet. And we have already been through evacuation versus sheltering in New Hampshire and those type of considerations.

MS. DOUGHTY: But again, I guess --

JUDGE SMITH: He already answered they are not going to take them out of the building and put them on the bus if the stuff is coming down.

So now your question is, well, what if it's a long time, what are you going to do. And I know that you can go on with these scenarios forever.

What is your answer? What if it's a long time, then what are you going to do?

Do you have enough information?

THE WITNESS: (Callendrello) I don't have enough information.

JUDGE SMITH: He doesn't have enough information.

JUDGE COLE: Because it's dependent upon the concentrations and measurements and many other factors?

THE WITNESS: (Callendrello) And " a long time" is relative.

JUDGE SMITH: Conclude this line and then move on to the next line.

MS. DOUGHTY: This is sort of a subline of a line.

BY MS. DOUGHTY:

Q Now are the MS-1 hospitals expecting -- have they been informed that some of the people that they may be expected to treat are also handicapped?

Have they been apprised of that fact?

A (Sinclair) Specifically, no. They have been advised that they will be treating a variety of people who may have a variety of problems, all related to their capacity as an MS-1 facility.

I don't think a hospital differentiates between someone in a wheelchair or someone brought in on a stretcher or someone who walks in.

Q Now the two MS -- this has been gone over, but I just want to reiterate a little bit.

The two MS-1 hospitals are St. Joseph's and Brigham & Women's; is that correct?

A (Callendrello) That's correct.

Q The primary MS-1 is St. Joseph's?

A (Callendrello) Yes.

Q Could you direct me to the part of your testimony that talks about the numbers of contaminated injured individuals that St. Joseph's is able to deal with, or is that just in Appendix M?

A (Sinclair) I believe the rate per hour is referenced in Appendix M.

Q Is there any kind of overall estimate?

I just don't recall it at this present time, of the numbers of --

A (Sinclair) In terms of the total numbers of people?

Q -- upperbound estimate that they feel that they can deal with.

A (Sinclair) Within what time frame?

Q Within -- well, did they establish a time frame and say we'll take this many people over so many hours? Have they established any limit on the time or numbers?

A (Sinclair) No, they did not, nor does the plan.

In my discussions with Dr. Pelle and other people at the hospital, they indicated that the time that it would take to deal with an individual patient would be determined by the condition of the patient.

Again, there is a considerable amount of confusion over the term "contaminated injured". If a person is simply contaminated and may in fact have some injuries as a result, injuries in the sense of radiation injuries, that's a different situation than the person who comes in with a broken leg and is contaminated. The treatment then -- the steps in the treatment then involve treating the broken leg first. Then accomplishing whatever decontamination can be accomplished and dealing with whatever consequences may be

beyond that.

So in each instance it has to be dealt with on a specific basis.

Q Person basis.

A (Sinclair) Right.

Q And one person could require a lot of time and attention, whereas someone else may require less.

A (Sinclair) Obviously.

Q Okay. It's my understanding that there is one shift of personnel at the MS-1 hospitals that has been agreed to; is that correct?

A (Sinclair) I can't answer that question off the top of my head.

Q Okay. I guess I'm sort of extrapolating from the fact that you say you comply with the GM MS-1 criteria. And I guess that at --

A (Sinclair) On page 56 of the testimony references the MS-1 criteria. "Each hospital listed under evaluation criteria L-I and L-III shall have at least one physician and one nurse on call within about two hours who can supervise the evaluation and treatment of radiologically contaminated injured members of the general public."

Q Okay. I guess specifically what I'm asking, is that your understanding of what St. Joseph's has agreed to?

A (Sinclair) Yes.

Q So that's one shift, is it not?

A (Sinclair) I don't read it that way. The hospital shall have at least one physician and one nurse on call within about two hours.

If the hospital must operate at a MS-1 mode for 48 hours or longer, they would have at least one physician and one nurse on call at all times who are able to fulfill those functions.

Q Okay. But have you confirmed that your understanding is their understanding?

A (Sinclair) My understanding is they have the staff to maintain their MS-1 capability on a continuing basis for however long that is required.

Q And you have been told that?

A (Sinclair) Dr. Pelle indicated that, yes.

Q Now among the people that might need transport also to MS-1 hospitals are the homebound evacuees; is that not true?

In the numbers, when you did your calculations as to the numbers of beds in hospitals, did you include consideration of the homebound evacuees listed?

I believe the numbers are listed at Attachment T of your testimony and under special needs homebound it says, 503 people in six towns.

Did you include any of those people in your calculations of hospital space that's required?

A (Sinclair) My understanding was that the basis for the 503 number did not include anyone who indicated a requirement to be immediately hospitalized.

In other words, if they are homebound now they are so because they did not need to be in a hospital. We assume that for the purposes of the initial evacuation effort that they did not need to go to a hospital.

Q Are you aware of the testimony of Mr. Trahan on the New Hampshire side of this case where he describes some situations where people deteriorated -- their condition deteriorated in transport?

A (Callendrello) Mr. Trahan is a nursing home operator, isn't he?

Q Right. Right.

But certainly some of the people in the nursing homes are not necessarily -- I mean, some of them have the same conditions as people that are homebound. It depends, if the family has someone at home instead of in a nursing home and then they need to transport, couldn't that kind of situation arise and shouldn't it be planned for?

A (Sinclair) Again, the special needs survey identifies those individuals with regard to their special assistance requirements.

None indicated that they needed to be transferred from their home directly to a hospital. They would be taken to a reception center and ultimately to a congregate care facility. If at that time it was determined they needed additional medical care that could only be provided in a hospital, they would most likely be moved from the congregate care facility to a hospital.

Your question would be, have we made arrangements for that to take place at the hospital? That arrangement would be made at the time.

Q Wouldn't the determination that they needed hospitalization perhaps be made at the reception center stage?

They have been transported by a vehicle to the reception center initially and then it is determined that they have a medical condition. Couldn't it very likely be

that -- maybe that's not good phrasing.

A (Sinclair) It might well be.

Q Wouldn't it be prudent planning to provide for that kind of --

A (Sinclair) If you're asking me where that determination can be made, that determination can be made as early as the initial contact with that individual to say, do you still need the assistance you indicated you needed at the time of the special needs survey.

The person at that point said, well, I now have a broken hip and I'm on a respirator; then we will provide whatever is needed to take that person out of their house to an appropriate facility.

JUDGE SMITH: She is talking about, as I understand it, the person who initially is deemed to not require hospitalization but as a consequence of transportation their condition deteriorates and somewhere along the line they need hospitalization.

Is that right?

MS. DOUGHTY: Yes.

THE WITNESS: (Sinclair) Yes.

BY MS. DOUGHTY:

Q I'm mainly concerned about from the reception centers, when the needs are identified at the reception center to bring them on to a hospital at that point.

And also, I'm concerned about the calculations of the capabilities of the hospitals, whether you have included any emergency for homebound individuals, both in your transportation to hospital calculations and in your actual hospital bed availability calculations?

JUDGE SMITH: That's where you confuse me again.

MS. DOUGHTY: I'm sorry.

JUDGE SMITH: Tell us about the homebound people again.

MS. DOUGHTY: All right.

JUDGE SMITH: We've got two kinds of homebound people. The kind of homebound people who on initial contact or before have indicated they have to go to the hospital.

And you've got another type of homebound person who is being taken to a reception center.

MS. DOUGHTY: Right.

And their condition, for whatever reason, deteriorates.

JUDGE SMITH: When does it deteriorate?

MS. DOUGHTY: In transport.

JUDGE SMITH: All right.

MS. DOUGHTY: As it did in the cases that Mr. Trahan testified about.

JUDGE SMITH: And that's exactly what I put to the witness and you said your interest in that type of person

was from the point of the reception center onward.

MS. DOUGHTY: Right.

JUDGE SMITH: And now you want to know, are the resources -- whenever the situation is discovered are the resources available to take care of them?

MS. DOUGHTY: Yes.

JUDGE SMITH: Just simply as a hospital for any type of illness.

MS. DOUGHTY: Right.

That, but before we even get to that. These people are transported, according to Attachment T, in vans and wheelchair vans and evacuation bed buses, and I'm wondering how they are then to be transported.

You have a number of them together and one of them needs to be transported then to a hospital from the reception center.

JUDGE SMITH: Are you abandoning the earlier question? Which I understood to be, you have not accounted for the number of people who previously have not been identified as needing hospital care, but as a consequence of transport had deteriorated, so now they need hospital care. And how do we know you have enough hospital beds.

MS. DOUGHTY: Oh, I want to do that, too. I'm trying to do --

JUDGE SMITH: Well, haven't you --

MS. DOUGHTY: -- it sequentially. I want to find out how they get to the hospital; and then I want to talk about when they are at the hospital, have they got that capacity.

JUDGE SMITH: They're going to get to the hospital and there will be no room for them.

MS. DOUGHTY: They haven't included that in their calculation.

JUDGE SMITH: I know. But you start down that line and then suddenly you back away from it and you go to how they're going to get there and you are mixing the whole concept up.

MS. DOUGHTY: I'm sorry. I thought maybe we should get them there first.

JUDGE SMITH: Pick your line of questioning and either follow it through or abandon or whatever. But you are mixing everything up.

What is your line of questioning right now?

MS. DOUGHTY: Well, I would like to, I guess, focus on the process of how they get identified.

JUDGE SMITH: How they get there, all right.

MS. DOUGHTY: And then get there. And then when we get them there --

JUDGE SMITH: Then we'll find out there's no room for them.

MS. DOUGHTY: -- worry about the capacity problem. I just thought that might be a logical way. But I don't want to confuse.

BY MS. DOUGHTY:

Q So again, we have the homebound people who are mainly being transported by vehicles other than ambulances.

What allocation or provision has been made to transport them should they need that to hospitals?

JUDGE SMITH: Well, now we did have rather lengthy examination on that subject, it seems to me.

MS. DOUGHTY: Okay.

JUDGE SMITH: Oh, to hospitals?

MS. DOUGHTY: Yes.

JUDGE McCOLLOM: I thought you were getting them to the reception center first. And that was the question asked.

MS. DOUGHTY: No. It's when they are at the reception center.

They have come there. The Applicants have vehicles to get them to the reception center. But if at that point it is determined that they -- they weren't anticipated to need hospitalization.

JUDGE SMITH: Okay. But they get there --

MS. DOUGHTY: Their condition is deteriorated. And how then do they get from that reception center to --

JUDGE SMITH: The hospital.

MS. DOUGHTY: -- a hospital.

BY MS. DOUGHTY:

Q Has that been planned for?

A (Sinclair) I believe --

Q I guess it's just a simple question.

A (Sinclair) I believe as Mr. Callendrello indicated in the earlier discussion regarding contaminated individuals, the same buses, personal vehicles, and/or ambulances would be called upon to move those people.

Q Now in the guidance memorandum -- FEMA Guidance Memorandum it states at the bottom of page three: "Provisions should be made for the use of contamination control in transporting contaminated persons to medical facilities."

If you have a contaminated person whose condition is also deteriorated and they need hospitalization, how are you going to --

JUDGE SMITH: Now here we are. You got a homebound, right.

MS. DOUGHTY: Yes.

JUDGE SMITH: Who previously indicated no medical needs.

MS. DOUGHTY: Yes.

JUDGE SMITH: And upon initial inquiry no medical

needs.

MS. DOUGHTY: Yes.

JUDGE SMITH: And they are taken to the reception center, and here they are, their condition has deteriorated.

And also, they get contaminated.

Is that right? Is that what we've got?

MS. DOUGHTY: Yes.

JUDGE SMITH: And they're going to get mixed up on the bus.

Now this is different than other contaminated people who have been --

MS. DOUGHTY: Well, Your Honor, I think this is a very confusing evacuation planning situation that they have. They have a whole variety of --

JUDGE SMITH: I'll tell you, I'm certainly --

MS. DOUGHTY: -- circumstances to deal with. And I think they haven't anticipated them all.

JUDGE SMITH: I just want to know, that's your question. This particular person is homebound. Has never previously indicated a need for hospitalization. It's assumed that they are not --

MS. DOUGHTY: Well, say they are not contaminated, but you want to transport them then on the bus and you have other people --

JUDGE SMITH: Tell them what your assumptions are.

I just want to know. You add up them, just tell them what they have to meet.

MS. DOUGHTY: All right.

BY MS. DOUGHTY:

Q Well, you're using buses to transport people from the reception centers to the hospitals and some of these are going to be the people that you've determined to be contaminated. But then you also have this person, we'll say he's noncontaminated, he's a special needs --

JUDGE SMITH: No, you say what it is.

But give them a question that they know what the assumptions are.

MS. DOUGHTY: Okay.

BY MS. DOUGHTY:

Q Let's have a noncontaminated special needs individual whose condition deteriorates by the time he reaches the reception center. Let's leave him still noncontaminated at the reception center.

But your means of transport to the hospital is a bus. And you're also wanting to put on that bus other people who are contaminated.

And the Guidance Memorandum for FEMA says that you have to have contamination control.

How are you going to get the contaminated people on to the bus; and then also, other people that need to go

that aren't contaminated such as this special needs person who suddenly needs assistance?

It's a long statement, but I hope it's clear.

A (Sinclair) I hope I understand it.

I think you have made the quantum leap that we're going to put the two different types of people on the same vehicle. And that's not necessarily the case. Certainly would not be the case.

If you had a radiologically contaminated individual that you were transporting to an MS-1 hospital, while at the same time you needed to transport a homebound handicapped individual to a regular host hospital, you would use two different vehicles.

There are different vehicles available at the staging area to do that.

In addition, as I indicated earlier, should that individual's condition be such that they required transport by an ambulance, you would call an ambulance.

Q Now let's move on to ambulances a little bit.

Mr. Callendrello, you --

JUDGE SMITH: See, for every scenario you come up with they're going to have another ambulance.

(Laughter)

MS. DOUGHTY: Right.

And now I want to talk to them about the number of

ambulances, I guess.

BY MS. DOUGHTY:

Q Are all the letters of agreement with ambulances included in Applicants' Exhibit 41?

Is that a comprehensive listing of where we are today in terms of numbers of ambulances?

A (Callendrello) That includes all the contracts. I don't believe there are letters of agreements with ambulances.

Q Or contracts?

A (Callendrello) That would include all contracts with ambulance companies.

As I indicated in an answer to Ms. Greer, there are -- those numbers vary depending on the quarterly update of the numbers presently. The numbers that are available are actually more than are stated in the contracts.

Q Okay.

So if the contracts only provide for 63 ambulances, would that sound correct to you?

A (Callendrello) No. It would not.

Q Are there nine ambulance companies in these contracts? Is that the total number? I counted nine.

A (Callendrello) My information is that the ambulances under contract add up to 89.

MS. DOUGHTY: Could we -- I don't know how we're

going to resolve this if we don't go through the numbers.

JUDGE SMITH: I don't know why we're going through the numbers of ambulances once again.

MS. DOUGHTY: Well, the contracts, Your Honor, I will represent that I believe that they add up, if my addition is correct, to only 63 ambulances.

JUDGE SMITH: Well, first, bring me up to date.

What part of the direct examination are you cross-examining on?

MS. DOUGHTY: I'm talking about the transportation arrangements from the reception centers to the hospitals, and it is probably mentioned in several places.

JUDGE SMITH: And in the context of that --

MS. DOUGHTY: Right.

JUDGE SMITH: -- you wish to litigate now the number of ambulances agreed to under contract.

We've already had a big litigation on that. And now you're going to challenge those figures?

MS. DOUGHTY: Well, nobody has challenged that.

Mr. Sinclair just told me that they're going to be able to allocate ambulances. Say, some special needs individual needs to go to a hospital and he just told me an ambulance --

JUDGE SMITH: Well, don't you think that you should have raised the number of ambulances available under

the portion of the litigation in which we litigated the number of ambulances available?

MS. DOUGHTY: Well, the Applicants withdrew their panel on that. So we haven't really had an opportunity to cross-examine an Applicants' panel on that. I haven't.

JUDGE SMITH: We heard it yesterday. And as far as I recall, there is virtually an inexhaustible supply of ambulances. If you accept the assumption that the governor will make those available, which I think is their position, that he has the power to do it and that's what is going to happen.

Go ahead. I'm going to give you three questions to make your point.

MS. DOUGHTY: Okay.

JUDGE SMITH: You are not going to go through a big litigation on the number of ambulances available, going back to letters of agreement, going through the whole thing again. You're not going to do it.

In the context of getting a homebound injured person who got sick on the way to the reception center to the hospital, you are not going to do all that. I'll just tell you right now; you've got three questions.

MS. DOUGHTY: Okay.

Just generally, our position is going to be that for reasonable assurance you should have a contract.

BY MS. DOUGHTY:

Q Are you not sure that you're going to have --

JUDGE SMITH: Now all of this, again, is hinged on the peg of a homebound person who says, no, I don't have to go to the hospital. On the way to the reception center it becomes evident, we get there and we're going to litigate all the ambulances again.

MS. DOUGHTY: Your Honor, this isn't about a context. We have also talked about other people that would need to go from the reception centers: the general public evacuees who might need hospitalization; anybody who might need --

JUDGE SMITH: Is that the context?

MS. DOUGHTY: -- anybody at all whether they --

JUDGE SMITH: Rephrase your question.

MS. DOUGHTY: Okay.

JUDGE SMITH: Put all your assumptions in your question.

MS. DOUGHTY: All right.

I'm trying to challenge the point that Mr. Sinclair said that they can just dedicate an ambulance to deal with all -- they will be able to find enough ambulances to take everybody that develops medical problems that are identified at the reception center to the appropriate hospital.

And my question is:

BY MS. DOUGHTY:

Q Do the contracts that have been provided as Applicants' Exhibit 43 provide anything more than 63 ambulances; four ambulettes; and 34 wheelchair vans?

A (Callendrello) I don't have the letters of agreement or the contracts in front of me.

My understanding is that we have 11 companies under agreement, contracted for 89 ambulances. The most current information, which is invoice information, actually increases that number to 97; and that's out of a total fleet size of 131.

MS. DOUGHTY: Excuse me one moment.

(Counsel searches for document.)

MS. DOUGHTY: I see what might be the problem, Your Honor.

My Exhibit 41 doesn't have some things that are here. So it was that Applicants' Exhibit 41 was not complete then. Is that the source of the misunderstanding?

I see two ambulance companies that don't appear in this exhibit. That may be the source of difficulty here.

THE WITNESS: (Callendrello) I believe Ms. Selleck, when she offered that exhibit, offered an addendum to it as well.

THE WITNESS: (Sinclair) Ms. Doughty, I would like to offer a further clarification of the statement regarding the ambulances.

From a planning standpoint, we were concerned in the letters of agreements with accounting for the number of ambulances needed to accomplish the evacuation from the EPZ.

Your scenario that you laid out for me involves what do we do in an emergency situation that develops at a reception center outside of the EPZ. And that is the context in which I indicated that I felt we could then call on these additional ambulance resources, for example, at Beverly or Andover, which normally serve those communities.

This is an emergency that occurs in that community, and those community ambulance resources, as a planning basis, can be relied upon to respond.

MS. DOUGHTY: Okay.

BY MS. DOUGHTY:

Q But does that conform with the FEMA guidance, that approach?

A (Sinclair) I believe it does in a practical sense.

A (Callendrello) It certainly --

Q But it says, "For other types of contamination specialized transportation resources, ambulance would be necessary and should be assured by agreements."

A (Callendrello) As I indicated, we have sufficient ambulances under agreements to meet all the pre-arranged needs, the planning basis.

Q Within the 10-mile zone that you're talking about.

A (Callendrello) The planning basis.

Q Okay, this is making it clear. It doesn't include the reception center activities.

A (Callendrello) I indicated there are some additional ambulances. If you look at the straight contract numbers, there are three additional ambulances. If you look at the numbers that are under invoice, there are roughly 11 ambulances that are available. If you look at the total fleet size, we are not taking into account the entire fleet size of companies we have contracts with. There are 131 ambulances, or roughly 45 more than are required for the

planning basis, and that's totally discounting the other ambulances that are available through the Commonwealth's powers.

Q But again, those are not, as the guidance memorandum states, secured by agreements?

A (Callendrello) The numbers, the 89 and the 97 are secured by agreements.

Q But that's --

A (Callendrello) Surplus ambulances.

Q Okay. That's the number.

A (Sinclair) The guidance memorandum refers to those for -- available for radiologically contaminated.

Q I'm sorry, Mr. Sinclair. Could you repeat that?

A (Sinclair) You cite the criteria as requiring agreements. Those agreements are for ambulance services to meet the needs of the contaminated injured.

The scenario you outlined for me of the homebound individual was not contaminated. That's why I relied on an outside ambulance to move that person. The ambulance --

Q Okay, I see the point you are making. You are not going to -- you are making it clear now that you are not going to rely on any of these ambulance agreements for the people who are noncontaminated that show up for the reception centers.

But for these people that are contaminated that

show up at the reception centers, you still have to rely on ambulances under agreement.

That's correct?

A (Callendrello) No. You don't have to rely on ambulances under agreement.

As the early part of that same section talks about, it's perfectly acceptable to transport somebody in a nonspecialized vehicle or private vehicle.

Q Okay, I probably am belaboring this more than it needs but --

JUDGE SMITH: Yes. Move on.

BY MS. DOUGHTY:

Q Mr. Callendrello, were you the one that dealt with hospitals or should I address the actual communications with hospitals to Mr. Sinclair?

A (Callendrello) Maybe Mr. Sinclair is more appropriate.

Q Okay.

Mr. Sinclair, did St. Joseph's and Brigham & Women's and Hunt and St. John's and Deaconess all agree that these numbers -- that subtracting the average occupancy from their total beds was a reasonable way of calculating what would likely be available?

Did they agree that that was -- did each hospital or each facility agree that that's --

A (Sinclair) I believe they did, although I did not talk to each one of those hospitals. I didn't contact anyone at Hunt Hospital, for example.

Q So this is hearsay. Someone told you? Did they actually tell you that they had agreed that that was reasonable, or are you just speculating?

A (Sinclair) It was developed as a planning basis, and the planners that I worked with on that confirmed with the hospital that the figures were accurate, and advised the hospitals that that's what we were using as a planning basis.

Q I noticed Brigham & Women's was not mentioned at the bottom of page 61 of your testimony.

Was that a deliberate omission?

This is in terms of hospitals that indicated their willingness through letters of agreement to accept evacuees.

A (Sinclair) The testimony distinguishes between host and MS-1 hospitals. Only St. Joseph's operates in both capacities.

Q Okay. So Brigham & Women's has made a decision not to serve as a host hospital?

A (Sinclair) They were not requested to.

Q So then how are the 216 beds be available as host, would they be available as host capacity?

A (Sinclair) They would be available to handle MS-1

patients.

Q Only.

So they would not be available for hospital patients or nursing home patients?

A (Sinclair) Not necessarily.

What the testimony states is that they are not -- they were not requested to enter into a letter of agreement to accept evacuees other than in their capacity as a MS-1 hospital.

Obviously, if they have 216 beds available at the time of an emergency and they agree to accept other evacuees, we would utilize those beds.

A (Callendrello) We have not relied on the use of Brigham & Women's as a host hospital, as a straight host hospital. We do rely on them as a back up MS-1 hospital.

If you look at the testimony on 62 and 63, where we go through the calculation of host hospital need versus supply, Brigham & Women's is not included in the calculation. The four facilities we do have arrangements with provide sufficient capacity.

Q Was the contract that appears for Brigham & Women's in Applicants' Exhibit 41 is dated February 15, 1977.

Is that contract still in force?

A (Callendrello) Yes. That volume includes current

contracts.

A (Sinclair) Are you referring to the agreement with Yankee Atomic?

Q No, I'm referring to the one with Peter Bent Brigham Hospital.

A (Sinclair) That contract is between Peter Bent Brigham Hospital, now known as Brigham & Women's Hospital.

Q Oh, I see. And Yankee Atomic.

A (Sinclair) And Yankee Atomic.

There is a cover letter accompanying that which extends the agreement to Seabrook Station.

Q Okay. The cover letter itself is dated -- the actual letter is dated May 16, 1986, but up at the top corner someone has typed in April 1988.

Could you explain what the significance of that is, or what --

A (Callendrello) It's likely that came out of Appendix C of the plan, and there may have been some global page numbering to make the appendix page numbers and also the current revision date.

Although without looking at it, I can't tell for sure.

Q Now this contract states, "So long as the hospital maintains the treatment center, it is understood by the parties that the above-mentioned mention is the U.S. NRC

Commission annual requirement of Yankee and the utilities."

But we don't have a letter for the last -- I mean this last letter is '86. So I didn't know what we were to draw from that as an inference.

Could you explain why there is no more recent letter?

A (Callendrello) As far as I know, we have not asked for any more recent letter. That letter is in force.

A (Sinclair) Again, as I explained --

Q Even under the terms of this contract?

A (Sinclair) -- for lack of a better term -- I'm sorry?

Q Even under the terms of this contract?

A (Sinclair) The contract is between Yankee Atomic and Peter Bent Brigham Hospital.

We have, for lack of a better term, piggy-backed onto that contract through our agreements with Yankee Atomic.

Q All right.

Mr. Callendrello, would you agree that sound emergency planning considers site-specific factors like population density in terms of making decisions about the numbers of resources that you will need?

A (Callendrello) Quite honestly, population density could enter into many different areas.

I can't answer that question. It's just too broad for me.

Q But generally in planning, isn't it true, when you are dealing with a population that you need to evacuate that the more people you have, the more need you have for facilities and resources to provide services?

JUDGE SMITH: Yes.

THE WITNESS: (Callendrello) I think that that would be only logical.

JUDGE SMITH: Yes.

THE WITNESS: (Callendrello) Obviously it's going to be dependent on that.

JUDGE SMITH: Official notice.

MS. DOUGHTY: Okay. All right, thank you.

BY MS. DOUGHTY:

Q Now I am going to ask you, do you think it is reasonable to require the same number of hospitals at a low-density site as at a very high-density site for emergency planning response purposes?

MR. FLYNN: I object. This is argumentation.

MS. DOUGHTY: Well, this is an attempt to challenge the --

JUDGE SMITH: Overruled on that basis. On that basis, it's overruled. I mean, on those grounds.

You may answer.

THE WITNESS: (Callendrello) Yes, I do.

MS. DOUGHTY: I'm afraid I don't clearly enough remember the question I asked, so this "Yes, I do" answer --

A (Callendrello) You asked me if it was appropriate to require the same number of hospitals for a low population density site as for a high population density site.

And I said, "Yes, it is."

Q Even though --

JUDGE COLE: Wouldn't it be dependent on the size of the hospital?

THE WITNESS: (Callendrello) Exactly, exactly.

MS. DOUGHTY: Okay.

BY MS. DOUGHTY:

Q Let us say you have a given medical treatment facility size, and as the population of people that you need to deal with escalates, wouldn't you reach a point at which you might need more than that size of a facility to deal with the needs?

A (Callendrello) I'm afraid I don't understand the question.

If you are asking me to comment on whether FEMA's Guidance Memorandum MS-1 is appropriate, I don't think I am in any position to do that. The guidance memorandum is a guidance memorandum, and we comply with the intent of that

guidance memorandum and the provisions of that guidance memorandum.

Q So as a planner you feel that that's the only standard you have to meet. You don't need to make your own determination as to whether that's a reasonable level of planning?

A (Callendrello) I think it is a reasonable level of planning, especially in light of the fact that there are other hospitals accessible in the Commonwealth that have got capability to treat radiologically contaminated and injured individuals.

Q To the extent that you haven't dealt with those hospitals or work with them in advance, that's an ad hoc kind of measure, is it not, to rely on them?

A (Callendrello) No. It's more than ad hoc. In as recently as 1986, Mr. Hallissey, from the Massachusetts Department of Public Health, contacted a large number of hospitals and asked for their capabilities in treating contaminated injured individuals.

And there are a number that wrote back that are close to the Seabrook EPZ that indicated they had the capability to respond and treat contaminated injured individuals. And those are hospitals that we don't rely on.

JUDGE SMITH: I think we might revisit Mr. Flynn's objection.

Go ahead with your next question.

MS. DOUGHTY: Okay.

BY MS. DOUGHTY:

Q Has New Hampshire Yankee made any direct inquiry on its own of more recent vintage than the conversation you just alluded to?

A (Callendrello) I don't understand the question. I just don't understand the question.

Q New Hampshire Yankee has not dealt directly with any hospitals in terms of actually planning provisions for medical treatment.

A (Callendrello) No, that's not true.

Q I mean to exclude other than the ones that you have --

A (Callendrello) That's also not true.

JUDGE SMITH: She's following up on your statement that they had determined the number of hospitals would be available for treatment of contaminated injured that you don't depend upon. She is following up on that.

She is pointing out that that was some time ago and you haven't done it yourself.

THE WITNESS: (Callendrello) We have not followed up with those hospitals, Your Honor. We have independently sought an agreement and received an agreement with another backup MS-1 hospital, however.

BY MS. DOUGHTY:

Q But that's not yet in the plan?

A (Callendrello) No. The agreement was just signed, I believe, a day or two ago.

Q Now the FEMA guidance requires that lists should be annotated. This is at Evaluation Criteria L-III. And I'm reading under "Areas for Review and Acceptance Criteria".

"The list should be annotated to indicate the ambulatory/non-ambulatory capacities for medical support for 'contaminated injured' members of the general public and any special radiological capabilities."

Now, is it your representation that Appendix M contains sufficient annotation of the special radiological capabilities?

A (Callendrello) The lists themselves describe essential information as far as ambulatory treatment rate. There are other documents that provide information as to the hospitals' capabilities. There are the letters of agreement in the contracts. There are also the hospitals' own internal protocols that describe their capability for treating contaminated injured individuals.

Q But that's not an annotated list in the plan that a responder could quickly look at.

A (Callendrello) No. The list that you are

referring to is the list that's in Appendix M.

Q Okay. Now that doesn't tell you -- if I needed someone who needed reverse isolation therapy, or pulmonary lavage, or chelation therapy, or intensive antibiotic therapy, I wouldn't know where to refer that person by looking at Appendix M, would I?

A (Callendrello) You are way beyond me in medical terms. I'm going to have to defer to Mr. Sinclair. I don't know what those mean.

A (Sinclair) You are correct. But at the same time no one in the ORO, who would be using that Appendix M, would make that kind of referral. That's a medical referral.

Q But wouldn't the RHTA have some responsibility for determining whether to refer?

Isn't that the individual at the reception center who determines whether to send someone on for further medical treatment, and wouldn't they want to direct them to the hospital that would have --

A (Sinclair) The particular techniques you are talking about would not be unique to any particular hospital. Both of the MS-1 facilities, St. Joseph's and Brigham & Women's, would have the capability to perform those if the physician, if the attending physician felt that was the necessary treatment.

Again, I would refer to the discussion I had with

Dr. Pelle regarding the capabilities of St. Joseph's Hospital. One of the things that he made clear to me was that if at any point during an emergency St. Joseph's felt their capabilities were being exceeded either by volume or by technique, diagnostic technique, they would immediately refer the patient on to Brigham & Women's, which is a nationally recognized center in dealing with nuclear medicine.

So in terms of does the capability exist to deal with the kinds of situations you outline within the system, it does.

Q Now how would the RHTA, from looking at Appendix M, know not to send somebody to Hunt Hospital?

A (Sinclair) It's not a designated MS-1 hospital.

A (Callendrello) I assume you mean the RAD health advisor.

Q At the reception centers, how would they know not to make that mistake, to send somebody to Hunt Hospital or to St. John's?

A (Callendrello) Neither of those are MS-1 hospitals, and they are not listed as MS-1 hospitals.

Q Okay. So there is something in the RHTA training and procedures that clearly instructs them as to that difference?

MR. FLYNN: I object to the line of questioning as

irrelevant. It goes beyond the admitted contention, and it also goes beyond the requirements of NUREG-0654.

I am looking at the planning criterion which Ms. Doughty referred to herself, L-III. And what it requires is that the listing of hospitals shall include the name, location, type of facility and capacities, and any special radiological capabilities.

It goes on to say, "These emergency medical services should be able to radiologically monitor contaminated personnel and have facilities and trained personnel able to care for contaminated injured persons."

I suggest that this line of questioning goes far beyond anything pertinent to that inquiry.

JUDGE SMITH: No, she simply is -- as I understood it, she began the line to say where is the list, where is that list with those annotations.

MR. FLYNN: But she is postulating far more detail in the list than the --

JUDGE SMITH: But she never got an answer, as I recall, to the undetailed question, as I recall.

MS. DOUGHTY: Yes. This is a variant on "Where is the beef?" Where is the list?

JUDGE SMITH: Where is the list referred to in FEMA guidance memorandum?

THE WITNESS: (Callendrello) I testified it's in

Appendix M.

JUDGE SMITH: Where is the annotation referred to in FEMA guidance?

THE WITNESS: (Callendrello) It's also in Appendix M.

MS. DOUGHTY: Let's look at it and maybe you can --

THE WITNESS: (Sinclair) Your Honor, may we have a moment to get an unredacted version of that?

JUDGE SMITH: Yes.

(Pause.)

THE WITNESS: (Callendrello) We've got that list now.

MS. DOUGHTY: Okay.

BY MS. DOUGHTY:

Q Maybe the problem is that the column that's blanked out here is -- what, for example, does it say for St. Joseph's?

A (Callendrello) It says under the column hospital name, contact and type, "St. Joseph's Hospital (primary MS-1), Sister Doris Brouilette".

Then for Brigham and Women's, it says, "Brigham & Women's Hospital (backup MS-1), Mr. David Drum."

JUDGE SMITH: Well, does the designation MS-1 subsume those particular attributes that the FEMA guidance

requires be annotated?

Is that the answer?

THE WITNESS: (Sinclair) There is another column on the page, Your Honor.

JUDGE SMITH: That's the thrust of the question right now.

Where is the annotation?

THE WITNESS: (Callendrello) The designation MS-1 implies some capability, but there is also a column labeled "Ambulatory Decontamination Rate" which indicates the rate and persons per hour that can be treated at the facility. And it also indicates the radiological capabilities in terms of a radiology department, nuclear medicine department, and the fact again is repeated that it's a primary MS-1 hospital.

BY MS. DOUGHTY:

Q In the column radiological capabilities, I notice the version I have here is blanked out. But what does it say? It just says MS-1 or backup MS-1?

Am I correct?

A (Callendrello) No. It says radiology for St. Joseph's Hospital. It says radiology department, nuclear medicine department, primary MS-1 hospital.

For Brigham & Women's --

THE WITNESS: (Sinclair) Regional radiation

prescription center, radiology department, nuclear medicine department, radiation therapy department, Marrow Trauma Unit, backup MS-1 hospital.

JUDGE SMITH: You are looking surprised.

Didn't you know this?

MS. DOUGHTY: No, I didn't. This is still a redacted version.

JUDGE SMITH: I see.

MS. DOUGHTY: I believe that's the problem, maybe.

I guess I have nothing further, but I would like to renew the motion to strike certain attachments to the testimony that I made at the very beginning, back two weeks ago when this Panel started.

I believe it was Attachments --

JUDGE SMITH: Ms. Doughty, there is no question you did receive the protected version of the -- it's just that you are not using it?

MS. DOUGHTY: I didn't receive it. But it may have been -- we have this problem with Mr. Backus's office being 40 miles away from mine.

JUDGE SMITH: Okay.

MS. DOUGHTY: And that may be something that slipped through the cracks. So I was taken by surprise, I must say.

JUDGE SMITH: All right.

JUDGE COLE: Did you want to see this copy?

MS. DOUGHTY: Yes, I would.

JUDGE SMITH: While you are looking at it, tell us what you want to strike? You can look at that over lunch.

MS. DOUGHTY: Okay. I would like to renew the motion to strike Attachments K and O and P on authenticity grounds, and the CERP Table 7.

JUDGE SMITH: Now wait a minute.

K, O And E on authenticity?

MS. DOUGHTY: O and P, yes.

JUDGE SMITH: K, O and P.

MS. DOUGHTY: Yes.

JUDGE SMITH: And what?

MS. DOUGHTY: And Attachment N just on relevance.

JUDGE SMITH: On relevance.

MS. DOUGHTY: No one has established what that list really is or what it means.

JUDGE SMITH: All right. K, O and P.

(Pause.)

JUDGE SMITH: You say you are renewing this motion.

Are there any objections to K, O and P on authenticity?

(The Board confers.)

JUDGE SMITH: No objections?

Do you have objection?

MR. LEWALD: There is an objection. Motion to strike, yes.

JUDGE SMITH: Well, I'm waiting for it.

MR. LEWALD: On the grounds of authenticity.

On K, the Anna Jacques Hospital internal disaster plan was a document that was furnished us by the Attorney General representing what it says it is.

JUDGE SMITH: We went through this before, didn't we?

MS. DOUGHTY: The only thing that came up about the Attorney General having provided it was the CERP document; and then I raised an objection. It became authenticated when they said they had sent -- I don't know.

But my problem with this, as I described earlier, was that it shows that it's a revised on a biennial**** or annual basis and the latest date on this is '85.

And historically looking at these dates across the bottom it was revised more often.

JUDGE SMITH: Well, when the motion -- you say you are renewing the motion.

MS. DOUGHTY: Right.

JUDGE SMITH: You made it originally on Attachment K, O, and P?

MS. DOUGHTY: Yes.

It was I think the Thursday before we broke. Two weeks.

JUDGE SMITH: What was the ruling of the Board?

MS. DOUGHTY: You deferred ruling.

JUDGE SMITH: Oh, we would wait.

MS. DOUGHTY: To see if they --

JUDGE SMITH: So now this is the moment of truth. Yes. Okay.

MR. LEWALD: Exhibit O --

JUDGE SMITH: Well, how about K?

MR. LEWALD: K was given us by the Attorney General in response to a discovery request as to emergency plans of -- what emergency plans existed at hospitals.

And we're assuming that the Attorney General didn't deliver a document that wasn't authentic.

MS. TALBOT: Your Honor, Mr. Lewald is, I'm sure, correct that the Attorney General produced documents K, O, and P. However --

JUDGE SMITH: He didn't say O and P; he just said K right now.

MS. TALBOT: Only K.

MR. LEWALD: I was dealing with one at a time, but they produced them all.

JUDGE SMITH: They produced them all.

MS. TALBOT: I don't have my very long list in front of me. There was a tremendous amount of documents we did produce.

But I just want to add for clarification that if the Commonwealth had this in its possession, and it was probably in its possession because at one time the Commonwealth had been planning. I never made any assertion -- the office never made any assertion that it was the most current. It was merely the document that was in the possession of the office.

JUDGE SMITH: The objection is no longer on authenticity. It's on relevance because of --

MS. DOUGHTY: Out-of-dateness.

JUDGE SMITH: -- out-of-date. Now they have switched it. They're not pursuing authenticity.

Is that right, Ms. Doughty?

MS. DOUGHTY: I guess. I haven't been to law school yet. so if there's a distinction between out-of-date, being out-of-date and beirg the authentic correct document.

JUDGE SMITH: You're not suggesting that these are forgeries?

MS. DOUGHTY: Well, one of them is just a magazine. It appears to be --

JUDGE SMITH: I know. But whatever, it's a real magazine, right? I mean, they didn't construct it. They

didn't make it up.

MS. DOUGHTY: I assume -- where it is referred to back in the testimony, it's referred to make a certain point and I also move to strike those portions of testimony that refer to these documents in supporting certain points in their testimony.

I just don't think that a magazine is --

JUDGE SMITH: All right.

You are not talking about authenticity, you are talking about something else.

MS. DOUGHTY: Relevance, I guess more than --

JUDGE SMITH: Reliability, I think.

MS. DOUGHTY: Reliability.

MR. TRAFICONTE: Your Honor, just on the narrow issues of authenticity, and I'm not sure how wide -- what authenticity means sometimes to cover.

Our view would be, we did produce these documents. When we produced our own CERP plan I think that -- and we're certainly not going to argue over authenticity, because it is our own Massachusetts document.

But if we had in our files a third party's document, which I think in this instance what we are talking about, of some vintage and we are asked in discovery to produce it and we do so. I don't see how that is going to help Mr. Lewald over any of the admissibility problems.

JUDGE SMITH: Be more specific about it. I can only handle one evidentiary problem at a time.

MR. TRAFICONTE: I don't want to cut Ms. Doughty's objection into pieces. I think her authenticity objection --

JUDGE SMITH: She's abandoned it.

MR. TRAFICONTE: Well, I don't think she should abandon it on the fact that we produced it in discovery. Because all we did was hand over what we found in our files.

JUDGE SMITH: And why?

MR. TRAFICONTE: Of a third party.

Because the fact that we had it in our files can't indicate anything about it.

JUDGE SMITH: Well, why was it in your files?

Had you relied upon it in your emergency plan? Was it a part of your emergency planning? Or do you just collect hospital files?

MS. TALBOT: Your Honor, Applicants and Staff had very broad discovery request. They asked for -- to paraphrase, something to the effect, you know, anything concerning hospitals in the EPZ. I went and dug through about 12 state agencie's files and there's some stuff dated from three years ago dealing with a hospital in the EPZ.

Presumably in there because at one point the state was engaged in planning and it no longer is, and turn them

over, here's your documents.

MS. DOUGHTY: Your Honor, I also move to strike the statements that these refer back to -- for example, Attachment K is referred to at page 30 of the testimony and the statement that this attachment is supposed to support is a similar procedure for the discharge of patients during an emergency as referenced in Anna Jacques Hospital external disaster plan, page seven, Attachment K.

And again, looking at the dates across the bottom of this page it looked like it had been renewed --

JUDGE SMITH: Well, Ms. Doughty, as I say, this is difficult enough, but we can't take all the shotgun objections on relevance and handle them -- I want to first deal with authenticity.

Now, they're in your file. And they are in your file, why?

MS. TALBOT: Well, Your Honor, they weren't in my file; they were in some file, probably from the Department of Public Health, somewhere in the back. The bottom file, literally.

It's really not something that was --

JUDGE SMITH: Now we're talking purely about authenticity. Is this document a real genuine document or is it something else? Not relevance. Not reliability?

MS. TALBOT: I don't know, Your Honor.

JUDGE SMITH: You don't know.

MS. TALBOT: I just got it out of some file and produced it. It's a third party document that was presumably no longer relied on that was in a file.

MS. CHAN: Your Honor, it seems that these documents were taken out of official records of some agency of the Commonwealth of Massachusetts. And we would have to assume that the agency has some official purpose in keeping these files.

MS. TALBOT: Your Honor, I object. Ms. Chan has no grounds for saying these came out of official files, whatever that means.

JUDGE SMITH: You don't know what that means.

Well, then you better just find out.

That objection is overruled.

Be specific, where did you get the documents?

MS. TALBOT: Your Honor, the Department of Public Health had a --

JUDGE SMITH: The Department of Public Health.

MS. TALBOT: Right. They had a file --

JUDGE SMITH: In their files.

MS. TALBOT: -- of dead documents when they were planning.

JUDGE SMITH: Oh, from their Department of Public Health planning section.

MS. TALBOT: No, Your Honor. You have to go there to understand it. It's not --

JUDGE SMITH: Well, I'm sure you can use the words to make me understand it. It was from the Commonwealth Department of Public Health, number one, their files.

MS. TALBOT: If my memory serves me correctly, yes. I don't have my index with me.

JUDGE SMITH: And then from, in more particular, from their dead files.

MS. TALBOT: That's how I would characterize it.

JUDGE SMITH: And why were the files dead?

MS. TALBOT: Because they weren't easily accessible. They were at the bottom. They weren't current. At one point there had been active planning and there no longer was.

JUDGE SMITH: Active planning.

MS. TALBOT: That's no secret, Your Honor.

JUDGE SMITH: And they were in the file because at one time they were actively planning, is that it?

Why were they ever in the file?

Now look, Mr. Traficonte, I think we are being jerked around on this. If these are documents that were legitimately within the possession of the Commonwealth, I want you to tell us that. If not, we will find out and we will just get these people here and we will subpoena them

and we will make them wait in the corridor one at a time and find out.

But we are not going to be jerked around by the Commonwealth.

MR. TRAFICONTE: Your Honor, our intent is not to jerk the Board around.

JUDGE SMITH: Then go find out if these are authentic documents.

MR. TRAFICONTE: We are reporting that we located the documents in the file. We can check and we will verify that they were in the files of the Department of Public Health.

JUDGE SMITH: And why?

MR. TRAFICONTE: But beyond that we cannot make any assertions.

And my point was, I wanted to draw the Board's attention to the distinction between our producing in discovery our own document, i.e., a document of the Commonwealth.

JUDGE SMITH: I understand that distinction.

I understand it's a third party document. But that is not exactly the same as not being authentic.

MR. TRAFICONTE: Fine.

JUDGE SMITH: If it was in your file for an official purpose and a relevant purpose, then it is

authentic as far as I'm concerned.

And if you're going to suggest it is not, as Ms. Talbot is --

MS. TALBOT: Oh, Your Honor, I didn't mean to suggest that. I'm just saying, I don't know.

MR. TRAFICONTE: In light of that description of authenticity we will stipulate that it's authentic.

JUDGE SMITH: All right.

MR. DIGNAN: Your Honor, could I bring to the Board's attention that the discovery request to which this document conformed is --

JUDGE SMITH: Mr. Dignan, microphone please.

MR. DIGNAN: The discovery request --

JUDGE SMITH: I want to point out that you have prevailed.

MR. TRAFICONTE: We stipulated it's authentic.

MR. DIGNAN: I want to get rid of that other objection that came in behind it. Yes.

JUDGE SMITH: We're going to come up with relevance.

MR. DIGNAN: Because it says, "The interrogatories and request for production of documents was, do Amesbury and Anna Jacques Hospital possess evacuation plans for any types of emergency? If so, produce copies of all such plans. If not, explain in detail why not?"

This is what was produced. They were produced as the current plans. As far as I'm concerned it's an admission against interest of a party and it's in.

JUDGE SMITH: That's your ruling.

MR. DIGNAN: What?

JUDGE SMITH: That's your ruling.

(Laughter)

MR. DIGNAN: Well, excuse me. That's the ruling I would like. There is such a thing as admission against interest when they produce in response to that interrogatory. It's in against the party of the Commonwealth.

JUDGE SMITH: Now the objection -- that is over. The fact that it is in evidence.

The question now or I mean, it is in evidence as far as general relevance is concerned and authenticity.

Now the objection has been refined to the point, is it reliable for the purpose of being asserted in this testimony or is it unreliable because of its age.

MR. DIGNAN: And the burden falls on the Commonwealth to come in with something more recent at this point once it's in. That's the way I understand it.

JUDGE SMITH: Why is that?

MR. DIGNAN: Because we have produced --

JUDGE SMITH: Because of the relationship between

the Commonwealth and Anna Jacques Hospital?

MR. DIGNAN: No.

The point is, if we have gotten this document in because the Board is determined that it has general relevance and because it is authentic. If at that point somebody is going to challenge and say, well, there is better information; then the burden falls on them to come forward with better information.

JUDGE SMITH: Well, no.

MR. DIGNAN: That's true in any trial. If I produce a document which everybody agrees is relevant and the court admits it, but somebody's contention is that it's inoperative. At that point, it's up to them to come in with some evidence that it's inoperative.

(The Board confers.)

MR. TRAFICONTE: Can I ask Mr. Dignan the number of the interrogatory that you just read into the record?

MR. DIGNAN: 141.

MR. TRAFICONTE: Of the dual set? Second part of the dual?

MS. TALBOT: Okay, and what was our response to that? Did we give a written response to that interrogatory?

MR. TRAFICONTE: We're not familiar with what the most recent Anna Jacques document or plan is.

MR. DIGNAN: The response to the interrogatory -- I don't know what you put on the document production -- is, "The information called for is not within the domain or control of this office. To the extent that any information responsive to the question is known, it is the result of an investigation conducted by an attorney of this office in preparation for the instant litigation. As such, constitutes attorney work product."

Then you produced the documents.

MS. TALBOT: I think the document, Mr. Dignan, was probably produced in response to Staff's request for any planning document that ever existed in the possession of certain agencies in the Commonwealth.

MR. DIGNAN: Well, no, no. There was a separate production request in 146.

MS. TALBOT: I believe 146 --

MR. DIGNAN: You took an attorney/client privilege the first time around, and then you coughed it up.

MS. TALBOT: No, actually --

MR. DIGNAN: Now if you are telling us that what you did is handed us an Anna Jacques plan that you don't know what it is, then I suggest --

MS. TALBOT: Mr. Dignan, I'm simply --

MR. DIGNAN: -- you check with whoever the lawyer was running the investigation.

JUDGE SMITH: Wait a minute. Wait a minute.

(The Board confers.)

JUDGE SMITH: The Board wants to focus on what were the documents in question relied upon for in the testimony. We're looking at page 3.

MR. LEWALD: We used it generally as a planning basis.

JUDGE SMITH: Well, that's not good enough.

Specifically what facts in those documents, what concepts in the documents?

We are looking at a place where it refers to the procedure for the discharge of patients during an emergency. That's one.

Are there others?

(Pause.)

Ms. Doughty, point to the parts of the testimony

you believe should not depend upon the challenged exhibits?

MS. DOUGHTY: Okay.

JUDGE SMITH: Page 30?

MS. DOUGHTY: Page 30 per Attachment K is at the bottom of the second full paragraph, the sentence reading --

JUDGE SMITH: We've got that.

Go to the next one.

MS. DOUGHTY: Attachment N is at page 58, I believe. Fifty-eight, and that is in the second full paragraph that that's referred to. And the sentence above the reference to the CERP Attachment N hereto relies upon that attachment. So I think that --

JUDGE SMITH: Where?

MS. DOUGHTY: The sentence reads, "In addition to MS-1 hospital arrangements contained in the SPMC, the Commonwealth of Massachusetts has identified 12 hospitals in communities near the Seabrook Station EPZ that have the capability to deal with contaminated injured individuals."

And my objection to --

JUDGE SMITH: Right. That's two of them. Now, is that all?

MS. DOUGHTY: No. Page 61. Page 61 refers to Attachments O and P in the paragraph under the caption "Host Hospital Capabilities".

And the sentence reads, "However, the 1987 annual

reports for each of these hospitals (Attachments O and P hereto) indicate that the average daily census at Anna Jacques Hospital was 97 patients, and at Amesbury Hospital was 32 patients."

So I would like all of those sentences struck.

JUDGE SMITH: Well, let's go back to one we are actually looking at.

You challenge the fact that the 1987 annual reports do say what they say they do? You don't really challenge that.

MS. DOUGHTY: It's that --

JUDGE SMITH: You are saying --

MS. DOUGHTY: No, I guess it's more is this up-to-date information.

JUDGE SMITH: Right. I think you are making an argument as to weight.

As to O and P and the annual reports and the rate of discharge in and out, you are overruled as to striking.

Now where is the other one? On page 58?

MS. DOUGHTY: Page 58. This is reference to Attachment N, and it lists hospitals, but --

JUDGE SMITH: Well, capability to deal with contaminated injured individuals.

MS. DOUGHTY: Right. There is nobody to authenticate or describe what the caption really means.

JUDGE SMITH: You have lost authenticate.

MS. DOUGHTY: Okay. To describe the relevance of that in terms of what that caption means in terms of capabilities.

JUDGE SMITH: All right, let's look at N and see.

(The Board confers.)

JUDGE SMITH: Overruled.

And the last one is on page --

JUDGE MCCOLLOM: Thirty.

JUDGE SMITH: Thirty.

I mean, your motion is denied. When I say overruled, I mean your motion is denied.

MS. DOUGHTY: The last one was at page 30.

JUDGE SMITH: We're looking at Attachment K and we don't see page 7.

MS. DOUGHTY: It's page 30?

JUDGE SMITH: Yes.

MS. DOUGHTY: Sorry? Page 30. There is a reference to it, Attachment K, and page 7 is --

JUDGE SMITH: Yes, I've got it.

MR. LEWALD: Page 205.

JUDGE COLE: Page 206.

(All parties review document.)

JUDGE SMITH: With respect to Attachment K, it relates to a procedure for the discharge of patients during

an emergency. And your complaint is that the procedure is dated 1985, and here we are 1989, and we have no reason to know that that procedure is valid.

That asks us to assume that there is no rational procedure for the discharge of patients during an emergency, and that's an assumption that I don't believe that is warranted from the age of the document itself. We would assume, I think correctly and with traditional legal validity, that a procedure once established continues until there is some evidence that it has been interrupted. And even though the precise means of discharging patients during an emergency may alter from time to time, the overall concept of discharging patients to make beds available during an emergency we would assume has continued from that time, and we have no difficulty with the logic of that.

So that aspect of the motion is overruled too.

MS. DOUGHTY: I guess we might be able to rely on the testimony of Mr. Danes who said that there is more recent vintage home health care and getting people out of hospitals more quickly might make this a smaller kind of reduction than they could have had in the past perhaps.

JUDGE SMITH: Well, why don't you cite the testimony if you are concerned about that. The age of it and the weight of it will all be taken into account if you come up with evidence.

But as far as the overall purpose of the reference, you can argue weight and we will listen to your argument, entertain it. But as far as striking the testimony based solely upon age, your motion is denied.

Is that all of it?

MS. DOUGHTY: Yes, Your Honor.

JUDGE SMITH: All right.

All right, with that, we will take a break for -- did you have something you wanted to bring up? Did you want to be excused, Mr. Traficonte?

MR. TRAFICONTE: No. I just wanted to find out if there is going to be redirect for the Panel.

JUDGE SMITH: Well, Ms. Chan hasn't examined, and I don't know what questions the Board might have.

MR. TRAFICONTE: I see.

JUDGE SMITH: I assume that there will be some redirect.

Will there be, Mr. Lewald?

MR. LEWALD: There won't be an extensive redirect at this point, Your Honor. We have one matter we did want to clear up. But beyond that, we do not plan an extensive redirect.

JUDGE SMITH: The Board itself will have very little, if any, questions.

How about you, Ms. Chan?

MS. CHAN: Five minutes.

JUDGE SMITH: Okay. Does that help

MR. TRAFICONTE: Yes, it does.

JUDGE SMITH: Then let's return at 1:25.

(Whereupon, at 12:25 p.m., the hearing was recessed, to resume at 1:25 p.m., this same day, Wednesday, May 17, 1989.)

AFTERNOON SESSION

(1:30 p.m.)

Whereupon,

ANTHONY M. CALLENDRELLO

DENNIS S. MILETI

MICHAEL C. SINCLAIR

having been previously duly sworn, resumed the witness stand herein, and was examined and further testified as follows:

JUDGE SMITH: Ms. Chan, you may inquire.

CROSS-EXAMINATION

BY MS. CHAN:

Q In your testimony there was some discussion about the time required for early dismissal, and I just wanted to clarify whether it's true that early dismissal would not take longer than the school ETE; and it would also fall within the ETE for the ERPA; is that correct?

A (Callendrello) That would be my understanding, yes. Knowing the mechanics of early dismissal, yes.

Q You were also questioned concerning the facility-specific plans for special facilities such as hospitals, whether or not these plans included drills.

And I believe the questioning was the limited to whether or not they drilled for fire or site-specific hazard.

Can you please tell me if these plans and drills

also include severe weather conditions such as hurricanes, tornadoes, or similar snow storms, or something similar to that?

A (Sinclair) The specific internal procedures that most of these special facilities have address the issue of how you remove patients from the building in the event of any kind of a threat to the health and safety of the people inside the building.

Q It's just removing them from the physical premises and not off the premises; is that correct?

A (Sinclair) For the most part, yes.

There were one or two instances where we looked at existing facility plans where there was arrangements to move them to a shelter within the community or in an adjacent community.

Q So there are plans to move them offsite for some of the facilities?

A (Sinclair) Yes.

It's a logical consequence if you have a fire in the building and you have to move the patients out of the building, you have to take them some place.

Q On cross-examination Ms. Greer was questioning you on how one would implement a cancellation of school in case of a radiological accident.

How are snow days declared and implemented? Are

you in possession of any information about that; and did you use that information to decide how you would contact school officials in case of a radiological emergency?

JUDGE SMITH: Ms. Chan, I thought of the same question at the time. But doesn't it go the other way. Doesn't the information flow from the superintendent rather than to the superintendent?

MS. CHAN: I was just checking to find out if it is implemented some other way.

JUDGE SMITH: Oh, I see.

THE WITNESS: (Sinclair) We are aware of the procedures that were used in the four school districts to declare snow days, and they essentially close school before it opens.

BY MS. CHAN:

Q And the superintendent seems to be capable of managing that in contacting the principals and the officials in that case?

A (Sinclair) They each have a procedure for doing it, yes.

MS. CHAN: That's all the questions the Staff has.

EXAMINATION BY JUDGE COLE

JUDGE COLE: Just a few questions.

On page 18 of your testimony, the bottom part of that page under the title of, "Generic and specific plans."

The first sentence says: "While not required supporting plan-specific to the type of facility, i.e., school, day care center, nursing home, et cetera, were developed."

Now with respect to this statement that they're not required, what was your basis for that, sir? Is that it is not required by any regulations of the Federal Emergency Management Agency or NRC or what was the basis for the statement that they are not required?

THE WITNESS: (Callendrello) Yes.

I know of no NRC regulation or FEMA guidance that requires that supporting plans be developed. Certainly, the guidance and the regulations require that provisions be made for these populations; and we have done that through the elements that are incorporated in the SPMC.

But to have a distinct stand-alone plan is not a requirement that I'm aware of in any NRC or FEMA document.

JUDGE COLE: Okay. Thank you.

Now on the next page, page 19, the first full paragraph on that page you state that: "Each special facility identified in the SPMC has been or will be offered a copy of an emergency plan-specific to their type of facility."

You used the term "has been or will be offered." What is the status of that? How far are you along in that? Are you mostly finished; are you half done; what?

THE WITNESS: (Sinclair) In the case of each special facility that was identified prior to this time and their name included in the SPMC, as it now stands, we have sent them a plan, a draft plan. And offered to meet with them and discuss it with them and tailor it to whatever they needs might be.

The reference to "or will be" means that any subsequent special facility that might be identified, the plan will be developed and they will be provided with it.

JUDGE COLE: All right, sir.

THE WITNESS: (Callendrello) In addition, we identify some facilities in the early part of the testimony that were not included in the SPMC at the time the testimony was written. And for those facilities, as well, they will be offered plans.

JUDGE COLE: All right.

Thank you.

On page 21, the next to the last sentence of the first paragraph on that page you refer to two hospitals in the EPZ that have emergency plans, in that sentence.

I'll read the whole sentence: "Further, the Mass Attorney General in supplemental responses to interrogatories has indicated that the two hospitals in the EPZ have emergency plans."

Are you familiar with the emergency plans that

they have and what are they for? What types of emergencies?

THE WITNESS: (Sinclair) In the case of the Amesbury Hospital they have a plan for evacuating the hospital; dealing with various internal emergencies that might occur or external emergencies.

In the case of the Anna Jacques Hospital they have two separate plans and/or procedures, if you want to call it. They call them procedures as opposed to plans, but the term is interchangeable here.

One applies to an internal emergency within the hospital such as a fire, explosion, or power outage, et cetera.

They also have a separate plan which deals with external emergencies, and that addresses what the hospital does in reaction to a major disaster such as a plane crash that impacts on the hospital, such as an inflow of a large number of injured people.

JUDGE COLE: Is it unusual for these hospitals to have their own emergency plans?

THE WITNESS: (Sinclair) Not at all; they're required to have them.

JUDGE COLE: They are required to have these plans in association with their accreditation; is that correct?

THE WITNESS: (Sinclair) And certain federal standards; yes.

JUDGE COLE: All right. Thank you.

On page 23, the last paragraph on the page, the first sentence: "The evacuation bed buses provided to special facilities will be operated by a driver fully trained to utilize the equipment."

What is the nature of the equipment referred to there in the evacuation bed bus?

THE WITNESS: (Sinclair) Bear with me for a moment.

The evacuation bed bus consists of a standard school bus in which special equipment is fitted. The basic equipment consists of a board that fits over the back of the seats with special brackets to hold it in place and straps.

In addition, there is a set of rails and a ramp which is attached to the rear door of the bus. The patient is placed on a stretcher which in turn is placed on a special litter carrier that has rollers on the bottom of it.

The unit is then lifted on to the rails, walked up into the back of the bus and rolls on the rails to the front end of the bus or to the next available bed. And the patient is then transferred from the litter on to the back board and strapped into place.

The equipment that comes with it needs to be installed and put in place, and the rails and ramp set up at the time they arrive at the special facility that's being

evacuated. And the driver is trained on how to do that procedure.

JUDGE COLE: Okay.

Thank you.

On page 33, in the middle paragraph on that page where you state that: "Subsequently it was determined that in some instances the contact points are not manned 24-hours a day." And you're referring to special facilities for Beverly Housing, I assume in that case.

And you go on to say that: "New Hampshire Yankee is re-evaluating the data on each of these facilities and its resident population and will revise the notification procedure in each instance."

Just what are you doing in that regard?

THE WITNESS: (Sinclair) As Intervenors pointed out, in a number of instances there are elderly housing projects which do not have an office that's opened 24-hours a day.

In the initial preparation of Appendix M we had indicated there was a contact point at each one of these elderly housing projects, and it listed the phone number of that office.

In some instances it turns out that that office is not manned 24-hours a day or there is an answering machine, which does not provide notification as we intended it in the

plan.

We're going back to look at each one of these facilities to see if there is a more appropriate way to ensure that the notification is made.

Keeping in mind that the public alert notification system is the primary means of notification. This is simply a backup or secondary notification to determine if there is any special situation that exists at that elderly housing project.

I would also point out that it's almost a redundant notification in the context of the special needs population, because if an individual in that housing project is self-identified as needing special assistance, their needs are provided for elsewhere in the plan.

JUDGE COLE: Are you recontacting these people to see if there can be a redress of that notification problem?

THE WITNESS: (Sinclair) That's our intent, yes.

If need be, for example, we might utilize -- as an example, we might utilize a route guide to go and make sure that the people in that facility have been alerted.

JUDGE COLE: All right, sir.

Thank you.

I expect we're going to get a report on the day care lists, and I had a question about how you plan to maintain the day care list. It might be redundant depending

upon what happened in that telephone conversation today.

MR. LEWALD: We could do that now if that's appropriate.

(The Board confers.)

JUDGE COLE: What are you going to do to maintain the list?

THE WITNESS: (Callendrello) I haven't heard fully what transpired in the telephone call.

I do understand that there is, evidently, -- there are evidently two lists. And we will seek to obtain the most current list, most complete list which includes those that appear on the licensing list, the registered list, and those that do not. And we will incorporate those into the plan.

And I indicated yesterday that if quarterly was the appropriate interval to incorporate; then we would do it quarterly.

JUDGE COLE: Depending upon the rate of change you observe?

THE WITNESS: (Callendrello) Right.

JUDGE COLE: All right.

Thank you.

That's all I have.

JUDGE SMITH: Do you have a report?

MR. LEWALD: Yes, Your Honor, we can report on the

conversation that was had between Georgia Gray, the person who signed the affidavit that's attached to Mass AG 86. It was had with Ms. Greer, Ms. Chan, Mr. Trout, and I.

We were informed that the lists that we had, which comprises Mass AG 86 is a so-called public list. That's the identification the agency gives to it.

This contains a list of all licensed family day care centers. The group day care centers is added to it.

The list contains, as I say, all the licensed family day care centers except those who have specifically requested not to be on the list.

It wasn't clear whether these names ever appear on any list. But there is an internal listing in the Office for Children Care that does have this information.

We have requested that this information be provided at the Applicants' expense as it is compiled by the Office for Children Care. And that it include both the so-called people who have asked not to be on the list and those that are on the public.

There is an identification for this kind of a list as so-called "Town List." And Ms. Gray is putting the request through the process in her agency to see if it passes muster with her supervisor.

And if it does we will b provided with the so-called "Town List" and also the "Group Care Center List."

If it doesn't pass muster then we will pursue a Freedom of Information Request of that agency for that information.

MR. LEWALD: (Continued) And this information then will be in the possession of the Applicant. The public list, we understand, is issued from Ms. Gray monthly. However, if it takes us the time to do a Freedom of Information Request with respect to every one of these lists, we, of course, are not going to be able to comply, or not going to be able to meet a monthly schedule.

But we will undertake to pursue this so that we can stay up to date as far as is possible with the Office for Children Care, as to identify each of the day care centers.

JUDGE SMITH: Mr. Callendrello thought, without particular consultation or anything else, that a quarterly updating would be appropriate.

Would you commit to that?

MR. LEWALD: Well, with the data that we would be acquiring for -- from the agency, we would take the data and look at it and see if there is any new information or any new identification of people.

And to the extent that appeared, this would be in an update of our records.

JUDGE SMITH: Once.

MR. LEWALD: Which would eventually be --

JUDGE SMITH: I'm talking about maintaining it.

MR. LEWALD: I think there is a general agreement

or a general commitment to update the Appendix M at least annually, and this would fall within that category.

MS. GREER: One other piece of information that the Board should be aware of that Ms. Gray also stated in that conversation was that the internally maintained lists, the listings that contain both the folks who are willing to be on the public lists as well as the private are updated on a weekly basis. The people who are willing to be on the public list, -- a new public list is published on a monthly basis.

The problem, apparently, is that there is a constant stream of new listings coming in literally on a weekly basis according to what she said. I assume that you may not in any given week have new listings for every single town in the EPZ, although you may well in the entire Region 3 which comprises a larger area than the EPZ six towns.

JUDGE SMITH: There are still two areas. We observed yesterday that from a relatively short period of time that the public list for Amesbury, for example, changed a lot. Suggesting that a need for rather frequent updating would be appropriate, and Mr. Callendrello agreed. He agreed that as much as quarterly updating might be useful.

My question now is: what is Applicants' position on that and would they commit to that? And Mr. Dignan says yes.

MR. LEWALD: To the extent that the data is available and --

JUDGE SMITH: That's one question. To the extent that the data is available --

MR. LEWALD: And obtainable, yes.

JUDGE SMITH: -- and obtainable, how often? How frequently? Quarterly?

MR. LEWALD: Well, we will do it quarterly if that indeed is what Mr. Callendrello has projected.

I thought Mr. Callendrello was talking about updating the data so our data base was --

JUDGE SMITH: That's what I'm talking about.

MR. LEWALD: -- reported quarterly.

As to when it's reflected in a separate edition of Appendix M.

JUDGE SMITH: That's different.

MR. LEWALD: That's different.

So the Applicant has made that, or will make -- or has made that commitment.

JUDGE SMITH: Now with respect to updating the data, you are also committed to use all legal means to gain the complete list.

MR. LEWALD: That's what we intend to do, yes, Your Honor.

JUDGE COLE: One thing I want to make sure is

clear. It is not the updating of Appendix M that would trigger any action on the part of the Applicant or licensee to contact that day care center and make them aware of what's available to them with respect to emergency planning.

MR. LEWALD: That's true.

JUDGE COLE: As soon as that name is available to them, is that correct?

MR. LEWALD: Yes, that's true. We wouldn't be waiting until that. As soon as the information is --

JUDGE COLE: Maybe I'll get the witnesses to answer that.

MR. LEWALD: Oh, well.

JUDGE COLE: Is that true?

THE WITNESS: (Callendrello) Yes, that's true.

JUDGE COLE: Okay, thank you.

THE WITNESS: (Callendrello) We would get the information. I outlined briefly what the process would be. We would contact the facility as soon as we saw a name that we hadn't recognized on a list, or different information, different address, phone number.

JUDGE SMITH: Do you have redirect?

MR. LEWALD: No, Your Honor. That was our only redirect, to cover that situation.

JUDGE SMITH: All right.

Any recross?

MS. DOUGHTY: I have none, Your Honor.

MS. GREER: If I may, I would like to pick up on at least one point that was brought out by Judge Cole in a question that he posed to Mr. Sinclair as to what procedure they are contemplating as far as contacting the residents of elderly housing projects and the suggestion proffered by Mr. Sinclair was that perhaps it would send out a route guide.

RECROSS-EXAMINATION

BY MS. GREER:

Q My question to Mr. Sinclair is, aren't some of those elderly housing projects enclosed with a central outside locking door? Notably, James Steam Mill, Heritage Towers, Sullivan Towers.

A (Sinclair) I believe in those three instances, yes, you are correct.

JUDGE SMITH: Do you know, having gone that far, in my own expèrience I can't imagine such a building that has locks that doesn't have some place posted on it, "In case of emergency, call a certain number." Moreover, it's becoming increasingly common that answering machines give that information. And I just wondered to what extent that when you are raising that issue you have taken into account, if you know, that aspect of it.

MS. GREER: I do not know that information, but perhaps Mr. Sinclair does, because he has looked into it.

JUDGE SMITH: It would be an unusual thing, I believe, to walk up to a building such as a building you are describing and not have an emergency number posted somewhere on it.

MR. DIGNAN: Better yet, a doorbell.

BY MS. GREER:

Q Do you know, Mr. Sinclair?

A (Sinclair) I know that at two of the buildings I visited there were emergency bells, buzzers that could be rung.

Again, I think you have to keep in mind that the primary notification system in an emergency would be activated and at least somebody in the building would be able to hear that. We can always depend, I believe, on the local police department. In the event we are unable to reach one of those facilities, we would ask the local police department for assistance. They have the means to contact the people.

I think what I pointed out to Judge Cole and what points out in the testimony is that we haven't yet determined what's appropriate for each one of those facilities. There is some reluctance on the part of the housing authorities involved to cooperate with us.

We will continue to pursue whatever is an appropriate means of notifying the people in these

facilities and reflect it in a subsequent amendment to the plan.

JUDGE SMITH: You are excused, gentlemen.

(The Panel was thereupon excused.)

Whereupon,

RICHARD W. DONOVAN

having been previously duly sworn, was recalled as a witness herein and was examined and testified further as follows:

JUDGE SMITH: Mr. Donovan, you remain under oath from your previous testimony.

THE WITNESS: (Donovan) Yes, sir.

MS. GREER: Your Honor, before we press on to this next game, just to clean up one minor detail from the last Panel.

Yesterday, there was cross-examination on Guidance Memorandum EV-2. I was not at that point sure whether we had previously offered that exhibit. I have now checked and it was not offered as an exhibit.

JUDGE SMITH: That's right.

MS. GREER: So I would like to formally offer it at this time.

JUDGE SMITH: Are there objections?

(No response.)

JUDGE SMITH: No objections. FEMA Guidance Memorandum EV-2, Protective Actions for School Children,

will be marked Massachusetts Attorney General Exhibit 91, I believe, and received in evidence.

(The document referred to was marked for identification as Massachusetts AG Exhibit No. 91 and received in evidence.)

JUDGE SMITH: Let 's go off the record.

(Discussion off the record.)

MR. FLYNN: I have some introductory remarks before I examine Mr. Donovan.

On Monday of this week, I furnished to the parties who were present and to the Board the Amended Prefiled Testimony of Richard W. Donovan on Behalf of the Federal Emergency Management Agency on the June 28 - 29, 1988 Seabrook Exercise. Today, I have furnished three copies of that to the court reporter for binding into the record.

JUDGE SMITH: You only have to furnish one.

MR. FLYNN: I see.

JUDGE SMITH: So give one of those to --

MR. FLYNN: Well, I can furnish additional copies for the Board or any other parties who need them.

The testimony consists of four parts. The first is headed, Amended Prefiled Testimony, the caption which I just read. It is dated May 17, 1989. This is identical to the prefiled testimony which was served on the parties

earlier with the exception of a final paragraph which appears on the third page.

That paragraph indicates that the second part of the testimony, namely, the exercise report which FEMA furnished to the Nuclear Regulatory Commission, has been amended in certain minor respects which are explained in summary fashion in this paragraph and in more detail on Attachment B to the testimony, which is entitled "Seabrook Post-Exercise Assessment Report Clarification Sheet".

JUDGE SMITH: What's Attachment A to the testimony?

MR. FLYNN: No, excuse me. It's Attachment B.

JUDGE SMITH: But what is Attachment A to the testimony?

MR. FLYNN: Attachment A was served previously, and that is the Extent of Play agreements which were entered into prior to the exercise.

Now I did not reserve those, but I have a limited number of extra copies if the Board desires.

I indicated a little while ago that there were four parts to the testimony. The first is the three pages of amended testimony. The second part is the exercise report itself. It is not offered as part of this testimony, but rather, incorporated by reference. It is already in evidence. It is Applicants' Exhibit 43F. That is FEMA's

post-exercise assessment, or as I've referred to it, the exercise report.

JUDGE SMITH: Is FEMA actually publishing new versions of the exercise report?

MR. FLYNN: No. I'll get to that in a moment. I just want to put everything in order here.

The third part is what we have just referred to; namely, Attachment A, which is the Extert of Play agreements.

The fourth part is Attachment B, which is the list of changes or corrections to the exercise report. Now, Your Honor, you have just asked me are we republishing the exercise report. The answer is no. And the reason is, the exercise report serves a purpose other than evidence in this hearing. It is advice which FEMA gives to the Nuclear Regulatory Commission on the outcome of the exercise. It is circulated to other parties as well. That is a document which FEMA has published and the conclusions in it are not changed.

What has changed is, largely as a result of preparation for this hearing, Mr. Donovan has come to refine his assessment or his understanding of which bus routes were run during the exercise. There were some that were counted twice. There were others which were not counted.

So the list of bus routes which were run during

the exercise has been amended, and the narrative has also been amended accordingly.

The specifics of those changes are on the sheet which I mentioned earlier, and several pages of revisions to the exercise report which were being offered for the purpose of this hearing only.

Now, without republishing the report, we are furnishing to the Nuclear Regulatory Commission copies of these changes. As I indicated before, they do not change our conclusions.

If the Board has no questions about my comments, I will then address a few questions to Mr. Donovan.

DIRECT EXAMINATION

BY MR. FLYNN:

Q Mr. Donovan, you have previously been sworn, and you have been introduced and the parties here are well familiar with you.

The purpose of your appearance here today is to offer testimony on the results of the June 1988 Seabrook exercise and to offer testimony on FEMA's assessment of that exercise.

Do you have before you the amended prefiled testimony dated May 17, 1989, which I described a moment ago?

A (Donovan) Yes, I do.

Q Are you familiar with it?

A (Donovan) Yes, I am.

Q Do you adopt this as your testimony?

A (Donovan) Yes, I do.

I would like to add one clarifying factor.

Page 3 of the report, the next to the last paragraph says that the overall conclusion which FEMA reached in evaluating the June 1988 Seabrook exercise; that the exercise demonstrated that the SPMC can be implemented.

I just wanted to point out to the Board's attention in the documentation that was previously provided to the Board, FEMA also asserted its statement that it also demonstrated that the plans for the State of New Hampshire and the plans for the State of Maine can be implemented.

MR. TRAFICONTE: Can I have a page reference for what you just --

JUDGE SMITH: That was the testimony, not the report.

MR. TRAFICONTE: Not the report.

JUDGE SMITH: You misspoke. You said the report.

THE WITNESS: (Donovan) That's right. It's page 3 of the testimony.

JUDGE SMITH: Well, do you wish to amend your testimony to include that?

MR. FLYNN: Well, the mechanics of amending it --

JUDGE SMITH: No, they are very simple. You write it in. Just write it in.

MR. FLYNN: Very well. Yes, we will do that, Your Honor.

JUDGE SMITH: How about getting the copy back the reporter is going to use, and write in the appropriate statement.

That's why a single copy to be bound into the transcript is the preferred way, and anything else is superfluous anyway.

MR. FLYNN: At the next break, Your Honor, I will take care of that.

At this time I offer the prefiled testimony of Richard W. Donovan as evidence and ask that it be bound into the record in this case.

JUDGE SMITH: All right. Mr. Donovan, you heard Mr. Flynn explain the significance of Attachment A and Attachment B. You were sitting there as he stated that.

Do you also adopt his explanation as a part of your testimony?

THE WITNESS: (Donovan) Yes, I do.

JUDGE SMITH: Are there objections?

MR. TRAFICONTE: No.

JUDGE SMITH: No objections.

Mr. Donovan's testimony, with Attachment A and

Attachment B, is received and you want it bound in.

MR. FLYNN: Yes.

JUDGE SMITH: It will be.

(The Amended Prefiled Testimony of Richard W. Donovan on Behalf of FEMA on the June 28-29, 1988 Seabrook Exercise, with Attachments A and B follows:)

May 17, 1989

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

JUDGE IVAN W. SMITH, CHAIRMAN
JUDGE RICHARD F. COLE
JUDGE KENNETH A. McCOLLOM

In the Matter of	)	Docket Nos. 50-443-OL
	)	50-444-OL
Public Service Co. of New Hampshire, et al.	)	Offsite Emergency Planning Issues
	)	
(Seabrook Station, Units 1 & 2)	)	

AMENDED
PREFILED TESTIMONY OF RICHARD W. DONOVAN ON BEHALF
OF THE FEDERAL EMERGENCY MANAGEMENT AGENCY ON THE
JUNE 28-29, 1988 SEABROOK EXERCISE

I am Richard W. Donovan. I have been employed by the Federal Emergency Management Agency (FEMA) in its Region X office at Bothell, Washington, (and by one of its predecessor agencies) as a Radiological Emergency Preparedness (REP) Program Officer since 1975 and as Chairman of the FEMA Region X Regional Assistance Committee (RAC) since 1979. I am also the Regional Assistance Committee Chairman for FEMA Region I for Seabrook. A Statement of Professional Qualifications was attached as an exhibit to testimony previously filed in these hearings.

Under a Memorandum of Understanding between FEMA and the Nuclear Regulatory Commission (NRC), FEMA has agreed to evaluate radiological emergency response plans and preparedness for areas around commercial

nuclear power plants and to provide NRC with findings and witnesses to support those findings as required by NRC's licensing procedures. In the case of Seabrook Station, FEMA provided written reports to the NRC on December 14, 1988, among which the September 1, 1988, report on the June 28-29, 1988 Seabrook exercise was incorporated by references. This exercise report has been provided to the Seabrook Service List and is incorporated into this testimony by reference.

A radiological emergency preparedness (REP) exercise is a test of the implementability of the plan(s). In the Federal Emergency Management Agency's (FEMA) REP Exercise Evaluation process, exercise participants are requested to demonstrate the implementation of their plans. The demonstrations are evaluated against certain exercise objectives, which are based upon the offsite planning standards contained in 44 CFR 350.5 of the FEMA rule. FEMA's exercise objectives are contained in FEMA's Guidance Memorandum GM EX-3, "Managing Pre-Exercise Activities and Post-Exercise Meetings", and its amendment, issued on March 7, 1988.

The expected demonstrations are defined by extent of play agreements with the exercise participants. An extent of play agreement is an agreement between FEMA and the exercise participant(s) on the manner in which a particular response function will be demonstrated. Included as Attachment A to this testimony and incorporated by reference is a document incorporating the extent of play agreed to in advance of the exercise by the participants. These extent of play agreements are important to an understanding of the

approach taken to demonstrating the implementability of various elements of the SPMC.

The overall conclusion which FEMA reached in evaluating the June 1988 Seabrook exercise is that the exercise demonstrated that the SPMC and emergency plans for the State of New Hampshire can be implemented.

For the purposes of this testimony, FEMA amends the September 1, 1988 Post-Exercise Assessment (PEA) to correct certain inaccuracies concerning bus route demonstrations in the State of New Hampshire and the State of Maine. Attachment B to this testimony is a REPORT CLARIFICATION SHEET explaining the changes made to pages 173-177 and page 181 of the PEA, together with the amended pages. The amendments do not affect the conclusions stated in the PEA.

4/17/89
ATTACHMENT TO
EXERCISE FILING

NEW HAMPSHIRE YANKEE

SEABROOK STATION

1988 FEMA/NRC GRADED EXERCISE

3.0 EXTENT OF PLAY

errata after exercise

Attachment A

SECTION 3.1.0

INTRODUCTION

The following section outlines the extent of play which will be demonstrated for the offsite organizations participating in the 1988 Seabrook Station Graded Exercise; namely, the NHY Offsite Response Organization, the State of New Hampshire and the State of Maine. The activities described in this section have been developed with FEMA to result in an extent of play which will demonstrate to the extent possible, all major portions of the response capabilities, as described in the respective plans.

SECTION 3.1.1

CONSTRAINTS AND INFLUENCES ON EXERCISE EXTENT OF PLAY

NRC regulations in 10CFR Part 50, Appendix E, §IV.F.1 require "a full participation exercise which tests as much of the ... emergency plans as is reasonably achievable without mandatory public participation." "Full participation" includes testing the "major observable portions" of the plans and mobilization of personnel and resources in "sufficient numbers to verify the capability to respond to the accident scenario." Nevertheless there are a number of constraints and influences (limitations) on the extent of play that may be achieved or the size of an approximate value of resources to be demonstrated. Several of these are reflected in Table 3.1-1 and include: #

(1) Personnel resources available to observe/control the exercise. Obviously, this constraint applies predominantly to FEMA and NRC staff personnel.

(2) Need to minimize the number of personnel who are away from normal health and safety duties. This constraint applies most immediately to police, fire and other emergency responders who will be participating

(3) Need to minimize the time away from normal duty stations. This is a constraint for all participants.

(4) Physical limits on the number of exercise "events" which one person can observe and evaluate. Once again, this is a constraint which applies chiefly to Federal government personnel.

(5) The need to prepare for litigation of issues related to the scope of the exercise.

(6) Social/economic impacts with regard to use of public facilities, e.g., interference with public use, and the need to assure that public resources such as buses, ambulances, or wheelchair vans, which are needed for normal emergency use, are not detained for exercise purposes to the public detriment.

(7) The lack of participation by State and local authorities in Massachusetts and the resultant questions regarding legal authority to demonstrate certain aspects of the offsite plan. In addition, the lack of participation by individual facilities, e.g., schools, day care centers, medical facilities, will impact a "reasonably achievable" extent of play.

Errata, Rev. 1, July 1988.

TABLE

EXTENT OF PLAY CONSTRAINT MATRIX

Constraint	NRC/FEMA	NHY/ORO	State of NH	State of Maine
1) Personnel Resources to observe/ control Exercise (Qualified Evaluators)	NRC/FEMA limited on qualified personnel for observers and evaluators	Same Constraint	Same Constraint	Same Constraint
2) Need for personnel to perform their normal Health and Safety duties - can't be away from normal duty posts	Some constraint on NRC/FEMA personnel	No Constraint	Real problem for state and local personnel (e.g., police, fire fighters and emergency responders) to be away from normal duty posts in any large numbers	Some constraint but limited due to ME's limited involvement
3) Time limits on Exercise - can't tie up personnel for extended periods	Constraint for NRC/FEMA personnel	Constraint for ORO volunteers	Constraint for state and local personnel	Constraint for ME personnel
4) Physical limits on number of events and exercise aspects any one person can observe and evaluate	Constraint for NRC/FEMA - limits number of events and aspects that can be run	Same Constraint	Same Constraint	Same Constraint

TABLE

EXTENT OF PLAY CONSTRAINT MATRIX
(continued)

Constraint	NRC/FEMA	NHY/ORO	State of NH	State of Maine
5) Litigation - Sample size for observation (e.g., number of buses to be mobilized and driven) - This will expand the necessary number of events	NRC/FEMA must increase observers to conform with the extent of demonstration	NHY must increase personnel, events to conform with the extent of demonstration	State and local personnel must be increased to conform with the extent of demonstration	Minor increase in ME personnel to conform with the extent of demonstration
6) Social/Economic Impacts - Use of Public Facilities to such an extent as to interfere with public use; use of public resources to public detriment (e.g.; tying up ambulances that are needed for normal emergency use)	Constraint for NRC/FEMA is economic limit on how much agencies can put into exercise	NHY financial constraints - limited resources to run exercise, pay for leases, etc.	Constraints on using public facilities to the exclusion of or impact to the public	No constraint - limited involvement
7) Lack of legal authority - Lack of participation by schools, day care centers, medical facilities, etc.	No Constraint	Substantial constraints on various aspects of exercise such as: o Sounding Sirens o Actual traffic control o EBS activation o Actual evacuation of a school	No Constraint	No Constraint

NEW HAMPSHIRE YANKEE

SEABROOK STATION

1988 FEMA/NRC GRADED EXERCISE

3.2 NHY ORO RADIOLOGICAL EMERGENCY RESPONSE ACTIVITIES

1988 FEMA GRADED EXERCISE

NMY OFFSITE RESPONSE ORGANIZATION (ORO)

FUNCTIONAL AREA INDEX

SECTION	FUNCTIONAL AREA
3.2.1	Special Care Facilities/Nursing Homes
3.2.2	School Contacts
3.2.3	Day Care/Nursery Contacts
3.2.4	Special Population Contacts
3.2.5	Hearing-Impaired
3.2.6	Transportation Resources
3.2.7	Access/Traffic Control Points
3.2.8	Traffic Impediment Evaluation
3.2.9	Media Center Inquiries/Hour
3.2.10	Rumor Control Inquiries/Hour
3.2.11	EBS Station Demonstration; WLYT
3.2.12	EPZ Hospitals
3.2.13	Host Hospital Contacts
3.2.14	MS-1 Hospital
3.2.15	Reception Center Monitoring Trailer
3.2.16	Host Facility Contacts

1988 FEMA GRADED EXERCISE

NMY OFFSITE RESPONSE ORGANIZATION (ORO)

FUNCTIONAL AREA INDEX
(continued)

SECTION	FUNCTIONAL AREA
3.2.17	CCC Contacts/Referrals
3.2.18	Emergency Worker and Vehicles Monitoring and Decontamination
3.2.19	Dosimetry/KI
3.2.20	PANS
3.2.21	Recreation Facilities
3.2.22	Control Cell Command Center (CCCC)
3.2.23	IEPZ Sample Collection Teams
3.2.24	Shift Turnover with YAEC Mutual Assistance
3.2.25	Laboratory Operations

*

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.2.1

Title: NHY ORO Special Care Facilities/Nursing Homes

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Participating Special Care Facilities, Special Population Coordinator, Special Population Liaisons, Local EOC Liaison Coordinator, Local EOC Liaisons

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Special Population Liaisons, NHY Control Cell, FEMA Control Cell, Local EOC Liaison Coordinator, Local EOC Liaisons, Special Population Coordinator

Sub-category: Staging Area, Simulated Local EOCs, NHY ORO EOC, NHY Control Cell, FEMA Control Cell

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 3

Comments: N/A

Summary: The process of demonstrating notification and information exchange with special care facilities will be evaluated by FEMA in the Salem, NH Staging Area and in the NHY ORO EOC. Special Care Facilities/Nursing Homes will be simulated with the use of a NHY Control Cell. Contacts with Local Officials in Local EOCs will be simulated with the use of the FEMA Control Cell. One participating Special Care Facility will be actually contacted/notified and information exchanged during the exercise. The participating Special Care Facility staff may be interviewed on day 2 of the exercise.

Constraints To Reasonably Achievable:

1. 1 of 39 Special Care Facilities are participating in the 1988 Evaluated Exercise.
2. No Massachusetts Nursing Homes are willing to participate in the 1988 Evaluated Exercise.
3. No Massachusetts Local EOCs are anticipated to participate in the 1988 Evaluated Exercise.
4. The Staging Area in Haverhill, MA may be simulated at Salem, NH.
5. The Exercise Scenario time line limits the transit ability of the Special Population Liaisons (Salem Staging Area to Haverhill Staging Area to Local EOCs to Simulated Local EOCs). Therefore, Liaisons will route directly from the Salem Staging Area to the Simulated Local EOCs. (The location of the Simulated EOCs has not been confirmed at this point.)

Methodology Description/Sequence Of Events:

NOTE: For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ.

1. At the ALERT declaration the Special Population Coordinator and Special Population Liaisons coordinate appropriate notification/information exchange with simulated Special Care Facilities/Nursing Homes (Control Cell) and also the participating Special Care Facility. The calls made by the Liaisons will be demonstrated for a period of one hour only.

thodology Description/Sequence Of Events: (Continued)

2. Meanwhile, the Local EOC Liaison Coordinator and Local EOC Liaisons coordinate the task of obtaining authorization and gaining access into the Simulated Local EOCs with Local Official (simulated) as determined by the scenario.

3. When authority is given to Liaisons to go to Local EOCs, all Liaisons authorized to relocate (Local EOC, Special Population and/or School) will discontinue any exercise activity and simulate transit to the appropriate Local EOC by traveling to the Simulated EOCs. Those not authorized will remain at the Staging Area. The location of the Simulated EOCs is at the Media Graphics room of the General Office Building at Seabrook Station.) *

NOTE: Transit times from the Haverhill, MA Staging Area to each Local EOC are less than or equal to the transit time from the Salem, NH Staging Area to the mulated EOCs. *

4. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will continue activities while located at the appropriate Simulated Local EOC.

5. All contacts with Local Civil Defense officials will be completed by telephone with the FEMA Control Cell as if the Liaisons were making personal contacts in the Local EOC. Contacts with nursing homes, special needs populations, etc., will be accomplished by calling the NHY Control Cell.

6. At the Site Area Emergency declaration, the Special Population Coordinator and Special Population Liaisons coordinate appropriate notification/information exchange with simulated Special Care Facilities/Nursing Homes (NHY Control Cell) and also with the participating Special Care Facility. The calls made by the Liaisons will be demonstrated a period of one hour only.

Methodology Description/Sequence of Events: (Continued)

7. At the General Emergency declaration the Special Population Coordinator and Special Population Liaisons coordinate appropriate notification/information exchange with simulated Special Care Facilities/Nursing Homes (NHY Control Cell) and also with the participating Special Care Facility. The calls made by the Liaisons will be demonstrated for a period of one hour only.

8. At the recommendation of a protective action or receipt of an upgrade in protective action, the Special Population Coordinator and Special Population Liaisons coordinate notifications to Special Care Facilities/Nursing Homes requests and exchange information with simulated Special Care Facilities (NHY Control Cell) and also the participating Special Care Facility. Again, the calls made by the Liaisons will be demonstrated for a period of one hour only.

9. If simulated Local EOCs are recommended to evacuate as determined by the scenario, all Liaisons (Local EOC, Special Population and School) will discontinue exercise activity and simulate transit to the Tewksbury, MA Area 1 EOC. *

10. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will remain at the simulation location, however, play as if evacuated from the appropriate Local EOC to the Tewksbury facility. *

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 19

Section Number: 3.2.2

Title: NHY ORO School Contacts

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: School Liaisons, School Coordinator, Local EOC Liaison Coordinator, Local EOC Liaisons and participating schools.

Total Resources Required/Involved: FEMA Evaluators, NHY controlling organization, School Liaisons, School Coordinator, NHY Control Cell, FEMA Control Cell, Local EOC Liaison Coordinator, Local EOC Liaisons.

Sub-category: Staging Area, Simulated Local EOCs, NHY Offsite Response EOC, NHY Control Cell, FEMA Control Cell.

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 4

Comments: N/A

Summary: The process of demonstrating notification and information exchange with schools (public and private) will be evaluated by FEMA in the Salem, NH Staging Area and the NHY Offsite Response EOC. All contacts with non-participating schools will be simulated through the use of the NHY Control Cell Command Center. Contacts with local EOC officials will be simulated through the use of a FEMA Controller in the Control Cell.

The Seventh Day Adventist School in Amesbury will be actually contacted and information exchanged during the exercise. School staff may be interviewed on Day 2 of the exercise.

[redacted] Number: 3.2.2

Constraints To Reasonably Achievable:

1. 3 of the 29 public/private schools is willing to participate in the 1988 evaluated exercise. *

2. No Massachusetts Local EOCs are anticipated to participate in the 1988 evaluated exercise.

3. The Staging Area in Haverhill, Massachusetts may be simulated at Salem, NH.

4. The exercise scenario time line inhibits demonstration of the transit ability of the School Liaisons. (Salem Staging Area to Haverhill Staging Area to local EOCs to simulated Local EOCs). Therefore, Liaisons will route directly from the Salem Staging Area to the simulated Local EOCs. (The location of the simulated EOC has not been confirmed at this point.)

Methodology Description/Sequence Of Events:

[redacted] For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ. *

1. At the Alert declaration the School Coordinator and School Liaisons will coordinate the appropriate notification/information exchange with simulated and participating schools to the Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.

2. Meanwhile, the Local EOC Liaison Coordinator and Local EOC Liaisons will coordinate the task of obtaining authorization and access into the simulated Local EOCs through simulated Local Officials.

3. When authority is given to Liaisons to go to Local EOCs, all Liaisons authorized to relocate, (Local EOC, Special Population and/or School) will [redacted] discontinue any existing exercise activity and simulate transit to the *

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.hodology Description/Sequence Of Events: (continued)

appropriate Local EOC by traveling to the simulated EOCs. Those not authorized will remain at the Staging Area. (The location of the simulated EOCs is at the Media Graphics room at the General Office Building at Seabrook Station.

NOTE: TRANSIT TIMES FROM THE HAVERHILL, MA STAGING AREA TO EACH LOCAL EOC ARE LESS THAN OR EQUAL TO THE TRANSIT TIME FROM THE SALEM, NH STAGING AREA TO THE SIMULATED EOCs.

4. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will perform emergency response activities while located at the appropriate simulated Local EOC.

. All contacts with Local Civil Defense Officials will be demonstrated via phone link with the FEMA Control Cell as if the Liaisons were making personal contacts in the Local EOCs. Contacts with schools, day care, etc., will be accomplished by calling the NHY Control Cell.

6. Upon declaration of a Site Area Emergency the School Coordinator and School Liaisons will coordinate appropriate notification/information exchange with simulated and participating schools via the NHY Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.

7. At the declaration of a General Emergency the School Coordinator and School(s) Liaisons will coordinate appropriate notification/information exchange with simulated and participating schools via the NHY Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.

Number: 3.2.2

Methodology Description/Sequence Of Events: (continued)

8. At the recommendation of a protective action or upgrade in protective action, the School Coordinator and School Liaisons coordinate notifications, school requests and information exchange with simulated and participating schools via the NHY Control Cell. Again, the calls made by the Liaisons will be demonstrated for a period of one hour only.

9. If simulated Local EOCs are recommended to evacuate, as determined by scenario, all Liaisons (Local EOC, Special Population and School) will discontinue all exercise activity and simulate transit to the Tewksbury, MA Area 1 EOC. *

10. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will remain at the simulation location; however play as if evacuated from the appropriate Local EOC to the Tewksbury facility. *

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 19 *

Section Number: 3.2.3

Title: NHY ORO Day Care/Nursery Contacts

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Participating Day Care Centers/Nurseries, School Liaisons, School Coordinator, Local EOC Liaison Coordinator, Local Liaisons

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, School Liaisons, School Coordinator, NHY Control Cell, FEMA Control Cell, Local EOC Liaison Coordinator, Local EOC Liaisons

Sub-category: Staging Area, Simulated Local EOCs, NHY Offsite Response EOC, NHY Control Cell, FEMA Control Cell

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 3

Comments: N/A

Summary: The process of demonstrating notification and information exchange with Day Cares/Nurseries will be evaluated by FEMA in the Salem, NH Staging Area and the NHY Offsite Response EOC. All contacts with non-participating day cares/nurseries will be simulated through the use of the NHY Control Cell. Local EOC Official Contacts will be simulated through the use of FEMA Controllers in the Control Cell. Three day cares/nurseries will actually be notified and applicable information exchanged during the exercise. Participating Day care/nurseries staff may be interviewed on Day 2 of the exercise.

* Revised June 1, 1988

Section Number: 3.2.3

Constraints To Reasonably Achievable:

1. Three (3) of 78 day cares/nurseries are willing to participate in the 1988 Evaluated Exercise.
2. No Massachusetts Local EOCs are anticipated to participate in the 1988 Evaluated Exercise.
3. The Staging Area in Haverhill, MA may be simulated at Salem, NH.
4. The exercise scenario time line limits the transit ability of the School Liaisons (Salem Staging Area to Haverhill Staging Area to Local EOCs to simulated EOCs). Therefore, Liaisons will route directly from the Salem Staging Area to the simulated Local EOCs. (The location of the simulated EOC has not been confirmed at this point.)

Methodology Description/Sequence Of Events:

NOTE: For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ.

1. At the Alert declaration the School Coordinator and School Liaisons will coordinate the appropriate notification/information exchange with those simulated and participating day cares/nurseries via the Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.
2. Meanwhile, the Local EOC Liaison Coordinator and Local EOC Liaisons will coordinate the task of obtaining authorization and access into the simulated Local EOCs with simulated Control Cell Local Officials.
3. When authority is given to Liaisons to go to Local EOCs, all Liaisons (Local EOC, Special Population and School) will discontinue all exercise

Section Number: 3.2.3

Methodology Description/Sequence Of Events: (continued)

activity and simulate transit to the appropriate Local EOC by traveling to the simulated EOCs. (The location of the simulated EOCs has not been confirmed.)

NOTE: TRANSIT TIMES FROM THE HAVERHILL, MA STAGING AREA TO EACH LOCAL EOC HAVE BEEN PREVIOUSLY DOCUMENTED. THIS TIME HAS BEEN INCORPORATED INTO THE MESSAGES FOR NHY CONTROLLERS.

4. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will continue activities while located at the appropriate simulated Local EOC.

5. All contacts to Local Civil Defense officials will be simulated via phone contact with FEMA Control Cell as if the Liaisons were making personal contacts in the Local EOCs. Contacts with day care, nurseries will be accomplished by calling the NHY Control Cell.

6. Upon declaration of the Site Area Emergency, the School Coordinator and School Liaisons will coordinate those appropriate notifications and subsequent information exchange with day cares/nurseries simulated and participating via the NHY Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.

7. Upon declaration of the General Emergency the School Coordinator and School Liaisons will coordinate those appropriate notifications and subsequent information exchange with day cares/nurseries simulated and participating via the NHY Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour only.

Section Number: 3.2.3

Methodology Description/Sequence Of Events: (continued)

8. At the recommendation of a protective action or upgrade in protective action, the School Coordinator and School Liaisons will coordinate notifications, day care/nursery requests and information exchange with the simulated and participating day cares/nurseries via the NHY Control Cell. Again, the calls made by the Liaisons will be demonstrated for a period of one hour only.

9. If simulated Local EOCs are recommended to evacuate as determined by the scenario, all Liaisons (Local EOC, Special Population and School) will discontinue any exercise activity and simulate transit to the Haverhill, MA Staging Area.

10. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will remain at the simulated location; however play as if evacuated from the appropriate Local EOC to the Haverhill facility.

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 18

Section Number: 3.2.4

Title: NHY ORO Special Population Contacts

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Special Population Coordinator, Special Population Liaisons

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Special Population Coordinator, Special Population Liaisons, NHY Control Cell

Sub-category: NHY Offsite Response EOC, NHY Control Cell, Staging Area, Simulated Local EOCs

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: Included in number assigned to facility

Summary: The process of demonstrating notification and exchange of information with special populations will be evaluated by FEMA at the Salem, NH Staging Area and the NHY Offsite Response EOC. All contacts with special populations will be simulated through the use of the NHY Control Cell.

Constraints To Reasonably Achievable:

1. Minimizing the impact on the general public by not actually contacting the public.
2. Having the NHY Control Cell simulate public participation instead of making actual public contact.
3. Number of FEMA Evaluators available.

Section Number: 3.2.4

traints To Reasonably Achievable: (continued)

4. The Staging Area in Haverhill, Massachusetts will be simulated at Salem, NH.

Methodology Description/Sequence Of Events:

1. Notifications and exchange of information will be performed by Special Population Liaisons to simulated contact of special populations through the use of the NHY Control Cell. The calls made by the Liaisons will be demonstrated for a period of one hour at each ECL.

2. NHY Control Cell simulated special population individuals will provide information to Liaisons regarding transportation needs for evacuation, as required. For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ. *

TE: SEE TRANSPORTATION RESOURCES SECTION 3.2.6 EXTENT OF PLAY FOR DEGREE OF ACTUAL AND SIMULATED VEHICLE/PERSONNEL DISPATCH.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 18

Section Number: 3.2.5

Title: NHY ORO Hearing Impaired

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Special Population Coordinator, Special Population Liaisons, Staging Area Leader, Evacuation Support Dispatcher, Route Guides

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Special Population Coordinator, Special Population Liaisons, NHY Control Cell, Staging Area Leader, 20 Route Guides, Evacuation Support Dispatcher

Sub-category: NHY Offsite Response EOC, NHY Control Cell, Staging Area, Simulated Local EOCs, Bus Yards, simulated Bus Yards

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 3

Comments: N/A

Summary: The process of notifying hearing impaired will be evaluated by FEMA at the Salem, NH Staging Area, NHY ORO EOC, and actual field operations. Calls will be initiated as described in Section 3.2.4. All telephone contacts to hearing impaired will be simulated through the use of the NHY Control Cell. From the Control Cell, the Controllers will interject a number of successfully and unsuccessfully completed contacts. For purposes of controlling the exercise the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ. Unsuccessful telephone contacts to hearing-impaired will initiate the dispatch of Route Guides to those locations, to demonstrate notification. This will be evaluated in the field by FEMA. *

* Revised June 1, 1988

Section Number: 3.2.5

Methodolgy Description/Sequence of Events: (continued)

4. The following is a list of Route Guide assignments by names for each town:

Amesbury:	#1	Grace R. Merrill, Stuart Guchang
	#2	Gary Oleson, Michael C. Shielos
	#3	William Therriault, William R. Cliff
	#4	Robert a Livesy, Paul Zagranis
	#5	Wallace Hayward, Leo Emmels
Merrimac:	#6	Laura Warner, Robert Grazier
	#7	Harold Fitzgerald, Pauline Yurkdvich
Newbury:	#8	Clifton J. Staples, Bernard Ziemian
	#9	Margaret Murray, Thomas Mercer
Newburyport:	#10	Helen Foster, Grace McDonald
	#11	Scholastici Blessing, Helen Danilecki
	#12	Mildred W. Jaques, Mary G. Doyle
	#13	Robert Blaisdell, Theodore Nixon
	#14	May Bivins, Margarett Gallegnar
	#15	Vera Kubik, Eva Lemieux
	#16	Helen Rainville, Jean C. Vallette
Salisbury:	#17	Concetta Capolupo, John Durto, Jr.
	#18	Eugene Dean, Edward Mahan
	#19	Geraldine Jansin, Robin Monroe
West Newbury:	#20	Edmond Paul, Jesse Claridge

5. The first three (3) Route Guides from the Staging Area will be accompanied by a FEMA Evaluator and a NHY Controller using a personal vehicle (FEMA, Route Guide, or Controller). These three Route Guides will travel from the Salem facility to a preset location (not finalized as of this date) prior to running their assignment. *

6. All other Route Guides (except the first three) will receive their assignments and proceed to the preset location and wait their turn to be assigned with FEMA Evaluators and NHY Controllers. The completion of these routes will be out of sequence. *

* Revised June 1, 1988

Methodology Description/Sequence of Events: (continued)

7. Once the Route Guide arrives at the predesignated location(s) (will be assigned two locations), delivers message to the Evaluator at each location and completes a familiarity interview, he will be directed back to the Salem Staging Area. Demonstration of this cycle completes that Route Guide's involvement.

8. The FEMA Evaluator and Controller will then pick up another Route Guide at the present location to run another controller identified route out of sequence from the exercise play. *

9. The process continues (#7, #8) until all 20 Route Guides have been evaluated.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18 and 19 *

ion Number: 3.2.6

Title: NHY ORO Transportation Resources

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Buses, wheelchair vans, route guides, ambulances.

Total Resources Required/Involved: 18 FEMA Evaluators, 14 buses, 14 bus drivers, ** 146 Route Guides, 3 wheelchair vans, 1 ambulance, 6 bus yards, 6 bus companies.

Sub-category: Facilities: ORO EOC, Staging Area, Bus yards, schools, Day Care Centers, Special Care Facilities, Transfer Points, Bus Routes, Reception Centers.

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 17

Comments: N/A

Summary: This extent of play identifies the constraints and limitations involved in the notification and demonstration of those transportation resources required to support transportation dependent general public, school, day care/ nursery and special care facility personnel evacuation. All transportation resource providers will receive an initial notification. Actual response will be limited to only those pre-contract companies and personnel identified herein. Eighteen (18) FEMA Evaluators will be assigned to buses, wheelchair vans and ambulances along with a NHY Controller. A pre-defined number of buses, wheelchair vans and ambulances will be dispatched to predesignated confidential routes demonstrating route logistics and procedural familiarity. For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ. ** *

* Revised June 1, 1988
** Revised June 14, 1988

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators.
2. The number of Controllers that are required.
3. The cost of leasing transportation resources in a non-emergency situation.
4. Limiting ambulance participation thereby minimizing the impact on public safety.

Methodology Description/Sequence Of Events:

The following section identifies the methodologies to be used:

1. To demonstrate the ability to provide evacuation transportation for members of the general public, schools, special needs facilities, Day Care Centers/Nurseries, specific extent of plays intrinsic to each were developed and are described below:
2. Six bus companies will be contracted to supply buses for the day of the Exercise. Unless constraints exist, contracts will be established and intact with the following companies prior to the Exercise.
   A. Dee Bus Company
   B. Buckingham Bus Company *
   C. Denise Inc. Bus Company
   D. Parent Bus Company
   E. Big W. Transportation
   F. Fox Transportation **

Revised June 1, 1988
Revised June 14, 1988

Section Number: 3.2.6

Methodology Description/Sequence of Events: (continued)

3. The 14 buses, three wheelchair vans, and one ambulance will be required to run the following routes: **

A. Seven buses for the transient dependent **

B. Four buses for schools

C. Three buses for day care centers

D. Three wheelchair vans for handicapped

E. One ambulance for health care facilities

4. Fourteen contracted buses and drivers will be dispatched requiring fourteen FEMA Evaluators and NHY Controllers. **

5. Packets will be prepared prior to the Exercise. These packets will include the identification of the routes using actual buses, and the bus companies from which they will originate. These packages will be provided by the NHY Controller to the Bus Dispatchers prior to leaving for the Bus Yards and the Evacuation Support Dispatchers to ensure only the required number of Route Guides to support actual vehicle routing, report to the yards. The remaining Route Guides, not assigned to the yards or to do hearing-impaired notifications, will remain at the Salem Staging Area until further directed (to simulate returning emergency workers for EWF demonstration or to be released).

6. Route Guide Assignments:

Route Guide assignments will be provided by the Bus Company Liaison in accordance with the dictates of the scenario and resources available. These

** Revised June 14, 1988

Section Number: 3.2.6

Methodology Description/Sequence of Events: (continued)

assignments will be noted and compliance with them will be simulated for the remainder of play. Actual assignment of Route Guides will be in accordance to the extents of play requiring their support. Specifically, the Route Guides will be assigned as listed below. These assignments, interjected by NHY Controllers, will be provided to players in the Staging Area by their dispatchers, and further; by the Bus Yard Dispatchers, once at the yards.

Bus Yard/Buses	Route Guides Assigned	
A. Dee Bus Company/2	5: 3 Evac. Routes in Salisbury and 1 Day Care each in Salisbury and West Newbury	**
B. Buckingham Bus Company/2	8: 5 Evac. Routes in Newburyport, 2 Day Cares in Newburyport and one Day Care in Newbury	
C. Denise Inc. Bus Company/3	8: 4 Evac. Routes in Newbury/2 Evac. Routes in Salisbury, and one school each in Newbury and Newburyport	**
D. Parent Bus Company/3	12: 7 Evac. Routes in Amesbury, 2 schools in Amesbury, 2 Day Cares in Amesbury, and one Day Care in Merrimac	
E. Big W. Transportation/2	3: 2 Evac. Routes in Merrimac and 1 school to Host Facility for Salisbury	
F. Fox Transportation/2	5: 3 Evac. Routes in West Newbury, one school in West Newbury and one school in Merrimac	**

Once the extent of play resources have been appropriately dispatched, the NHY Controller will interject to the dispatchers to report in as though scenario-generated numbers had been used. For purposes of controlling the exercise, the NHY Controlling Organization may inject data to the Offsite Response EOC for appropriate control. Field data and EOC data may differ. *

* Revised June 1, 1988
** Revised June 14, 1988

Section Number: 3.2.6

[redacted]hodology Description/Sequence of Events: (continued)

7. General Public Evacuation

The assignment of Route Guides and buses to demonstrate the evacuation of members of the General Public will be interjected by the NHY Controllers to the Bus Dispatchers as follows:

Bus Yard/Buses	Route Assignments	Route Guides	
A. Dee Bus Company/1	Salisbury Transfer Point	3	**
B. Buckingham Bus Company/1	Newburyport Transfer Point	5	
C. Denise Inc. Bus Company/2	Newbury Transfer Point and Salisbury Transfer Point	6	**
D. Parent Bus Company/1	Amesbury Transfer Point	7	
E. Big W. Transportation/1	Merrimac Transfer Point	2	
F. Fox Transportation/1	West Newbury Transfer Point	3	**

[redacted] Following the assignment of buses and Route Guides, each bus will proceed under the guidance of one of the Route Guides to the Transfer Point for the assigned community. Upon arrival at the Transfer Point, the Transfer Point Dispatcher will dispatch the bus to run a specific evacuation bus route based on informatin provided by the Transfer Point Controller. The other Route Guides will ride the bus but will not provide any routing guidance.

Upon completion of the route and return to the Transfer Point, the Route Guide Controller will select another Route Guide to guide the bus on another evacuation bus route. This process will be repeated until all desired evacuation bus routes for the community have been run (one time only).

General Public Evacuation Route #3 in Newbury will not be run. **

[redacted] The running of these additional routes is out of sequence.

** Revised June 14, 1988

Methodology Description/Sequence of Events: (continued)

When the final evacuation route for the community has been run, the Route Guide Controller will instruct the Route Guide to take the bus to the appropriate Reception Center. Upon arrival at the Reception Center and completion of monitoring/decontamination, the Controller will direct the bus to return to the Bus Company Yard. Once there, the Route Guides will be directed to return to the Salem Staging Area. Normal communications between Route Guides and the Staging Area should be maintained throughout the running of evacuation routes and travel to the Reception Center.

During the running of Evacuation Bus Route #4 in Salisbury, the Route Guide Controller on that bus will initiate Mini Scenario 8.2-2.

8. School Evacuations

The assignment of buses and Route Guides for the demonstration of evacuation of schools will be interjected by the Bus Yard Controllers to the Bus Yard Dispatchers as follows:

Bus Yard/Buses	Route Guide/School Assigned
Parent Bus Company/1	1 RG/Seventh Day Adventist School (Amesbury)
	1 RG/Amesbury High (Amesbury)
Denise Inc. Bus Company/1	1 RG/Triton School (Newbury)
	1 RG/Brown School (Newburyport)
Big W. Transportation/1	1 RG/Salisbury Memoral (Salisbury)
Fox Transportation/1	1 RG/Pentucket Regional Jr. High (W. Newbury)
	1 RG/Donahue School (Merrimac)

** |

Following the assignment of buses and Route Guides, each bus will proceed under the guidance of a Route Guide to the school assigned. When two Route Guides are assigned to a bus, the second Route Guide will ride the bus as a passenger and will not perform assigned functions until directed by the

Section Number: 3.2.6

Methodology Description/Sequence of Events: (continued)

Route Guide Controller accompanying the bus. Upon completion of the initial run to the assigned school, the bus will be directed to park in the vicinity of the school (if possible) and remain there for approximately 30 minutes to simulate student loading time. The Route Guide who guided the bus to the school will then be directed to take the bus to the appropriate Reception Center. During this initial run of the bus, the Route Guide should perform normal communications with the Staging Area. After completing this initial run, the NHY Controller will provide direction to the Route Guide to a simulated bus yard (location yet to be identified). Upon arrival at simulated bus yard, the evaluation for the first Route Guide is complete and the Route Guides switch roles. The Route Guide directing the bus is then provided by the Controller, a route assignment. The running of this route is out of sequence.

Upon arrival at the assigned school, the bus will again park (if possible) to simulate student loading. The Route Guide will then be directed to take the bus to the appropriate Reception Center. During this second school pickup run, the Route Guide should not communicate with the Staging Area since this run is out of the existing scenario time line. Upon completion of routes, all Route Guides will be given directions by NHY Controllers to return to the bus yards except the bus from Big W Transportation. This bus will continue on to the Host Facility.

Methodology Description/Sequence of Events: (continued)

When the bus to the Host Facility arrives, the Route Guide Controllers will direct the Route Guides to have the bus return to its yard.

Upon return of the buses to their original yards, Route Guides will be directed to return to the Salem Staging Area.

9. Day Care/Nursery Bus Evacuation Instruction

The assignment of Route Guides and buses to demonstrate Day Care/Nursery evacuation will be interjected by the NHY Controllers to the Bus Dispatchers as follows:

A. Route Guides will leave from the Bus Yard to the applicable town, to to the Reception Center, to the simulated bus yard, to the applicable town, to the Reception Center, to the bus yard, back to the Staging Area.

B. Dee Bus Company will provide one bus for the Day Care/Nursery routes. Two Route Guides and a Controller will board the bus at Dee Bus Company Bus Yard. The Controller will instruct the Route Guide to run Route 02 in Salisbury and return to the appropriate Reception Center (Beverly). At the completion of the route and trip to the Beverly Reception Center, the Route Guide will be directed to a simulated Bus Yard (location yet to be identified). The second Route Guide will then assume the duties and be informed to run route 01 in West Newbury and take evacuees to the North Andover Reception Center. Upon reaching the Reception Center they will be instructed to return to the bus yard where the Route Guides will be requested to return to the Staging Area.

Methodology Description/Sequence of Events: (continued)

C. Buckingham Bus Company will follow the same format as Dee Bus Company with the exception of having three Route Guides versus two. The flow path is as follows:

Route Guide 1:

Bus Yard --> Newburyport Route 02 --> Beverly --> Bus Yard (simulated at a pre-determined location.)

Route Guide 2:

Simulated Bus Yard --> Newburyport Route 04 --> Beverly --> Bus Yard (simulated at a predesignated location)

Route Guide 3:

Simulated Bus Yard (at a predesignated location)--> Newbury Route 01 --> Beverly --> Bus Yard --> Staging Area (all three Route Guides)

D. Parent Bus Company - same format as Buckingham Bus Company which has three Route Guides.

Route Guide 1:

Bus Yard --> Amesbury Route 02 --> North Andover --> Bus Yard (simulated at a predesignated location) **

Route Guide 2:

Simulated Bus Yard (at a predesignated location) --> Amesbury Route 03 --> North Andover --> Bus Yard (simulated at a predesignated location) **

Route Guide 3:

Simulated Bus Yard (at a predesignated location) --> Merrimac Route 01 --> North Andover --> Bus Yard --> Staging Area (all three Route Guides)

** Revised June 14, 1988

Methodology Description/Sequence of Events: (continued)

E. The chosen day cares and routes are:

Amesbury	Route
1. Elizabeth Howe	02
2. Denise Millette	02
3. Karen Miele	02
4. Annelises Hutchinson	02
5. Katherine Sferruzza	02
6. Katherine Marchitella	02
7. Sherrie Davey	03
8. Karen Fournier	03
9. Donna Blades	03
10. Jane Fournier	03
11. Evelyn Fournier	03
12. Shiela Taylor	03
13. Debra Notargiacomo	03
Merrimac	**Route**
14. Gayle LeBlanc	01
15. Lillian Stuart	01
16. Carol Goss	01
17. Eileen Flynn	01
18. Eileen Lawler	01
19. Shirley Innis	01
20. Michelle Boyer	01
21. Jean Gatchell	01

Methodology Description/Sequence of Events: (continued)

Newbury	Route
22. A. Hilton	01
23. Haley Daycare	01
24. Debra Dash	01
Newburyport	**Route**
25. Karen Degou	02
26. Janet Meldon	02
27. Dianna Parkinson	02
28. Laura Martel	02
29. Maureen Albert	02
30 Elizebeth Cox	02
31. Sue White	02
32. Janet Cook	04
33. Judy Lacrois	04
34. Newburyport Montessori	04
35. Mrs. Murray	04
36. Circle of Friends	04
37. Nancy McNeill	04
West Newbury	**Route**
38. Kids World Limited	01
39. Madelyn Cirinna	01
40. Lynn Wilson	01
41. Puddle Duck Place	01

:hodology Description/Sequence of Events: (continued)

4. Upon return to the Staging Area, the driver may return to the Bus Yard and be released from the exercise.

B. VAN #2 - Sequence of Events

This van can be dispatched in parallel using the sequence from Section A above:

1. The wheelchair van driver will drive the van to go to the Newbury Village Elderly Housing, 30 Rolf's Lane, Newbury, MA.

2. Upon completion of this, the van will proceed to the Beverly Reception Center and them complete the sequence as identified in Section A above.

C. Van #3 - Sequence of Events: This van can be dispatched in parallel, using the sequence of Section A above:

1. The wheelchair van driver will direct the van to Brigham Manor Nursing Home at 77 High Street, Newburyport, Massachusetts.

2. Upon completion of this the van will proceed to the Beverly Reception Center and then complete the sequence as identified in Section A above.

11. AMBULANCE EVALUATION

One ambulance will be dispatched from the Staging Area to the EPZ Risk Hospital (predetermined location). After successfully locating the hospital, the ambulance will proceed to the North Andover Reception Center and then to the Host Hospital (predetermined location). After completion of this circuit the ambulance will be directed by the NHY Controller to return to the Salem Staging Area where it will be released. The FEMA Evaluator and NHY Controller may follow the ambulance in a personal vehicle.

Methodology Description/Sequence of Events: (continued)

A. Successful evaluation will require the ambulance attendants to locate the EPZ hospital (no stopping required), North Andover Reception Center (monitoring may be required), and return to the Salem Staging Area. All speed laws will be obeyed. *

B. The NHY ORO will initially contact all ambulance companies that have a letter of agreement with NHY for support during an emergency at Seabrook Station. Subsequent notifications will be directed to the NHY Control Cell Command Center.

C. Only one ambulance will be used for Exercise activities on Day 1 minimizing the impact on public safety.

D. Initial resources that are identified as being available will be given to the Control Cell by the Controller at the NHY Offsite Response EOC.

E. Coordination between the Evacuation Support Coordinator, Special Populations Coordinator, Special Populations Liaison, and the Special Vehicle Dispatcher provide the necessary interfaces with the ambulance company/driver (Control Cell) as scenario warrants.

Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 20

Section Number: 3.2.7

Title: NHY ORO Access/Traffic Control Points

State Involved: Commonwealth Of Massachusetts (NHY ORO)

Resources To Be Evaluated: Traffic Control Points, Access Control Points, Staging Area, Shift Turnover

Total Resources Required/Involved: Three (3) FEMA Evaluators, NHY Controller Organization

Sub-category: NHY Offsite Response EOC, ACPs, TCPs, Staging Area,

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 3

Comments: N/A

Summary: All ACPs and TCPs will be evaluated by FEMA for their knowledge of procedure set up, etc. Some evaluations may be out of sequence. A shift change will be demonstrated at one (1) ACP and at one (1) TCP. The shift change will be evaluated by FEMA.

Constraints To Reasonably Achievable:

1. FEMA to provide three (3) evaluators
2. No set-up may occur in any lane of traffic or any public road
3. ORO lacks legal authority to actually control traffic or access unless authorized

Methodology Description/Sequence Of Events:

1. All traffic control point and access control points will be manned and evaluated by FEMA through discussion with personnel. Actual set up of the point will be simulated.

Methodology Description/Sequence of Events: (continued)

2. Three (3) FEMA Evaluators and NHY Controllers will travel throughout the EPZ to evaluate each ACP and TCP over the course of the Exercise.

3. Upon completion of the evaluation by FEMA, the ACP and/or TCP personnel will be directed by the NHY Controller to return to the Salem Staging Area to return their equipment, dosimetry, etc., and from there, they may be released. (Processing through the EWF will be simulated.)

4. The FEMA Evaluators/NHY Controllers will continue Steps 2 and 3 until all ACPs/TCPs are evaluated.

5. ACP (to be determined later) will be demonstrating a shift change. Upon determining FEMA would like to observe a shift change, the access control point proceeding the desired evaluation point will be used to initiate this effort. The NHY Controller using the field radio will call back into the Staging Area to have shift change personnel dispatched. Personnel that will be demonstrating the shift change will be told to leave the Staging Area at this time.

6. Upon completion of the observed shift change at the selected ACP, the Traffic Guides will be directed by the NHY Controller to return to the Staging Area to return their equipment, dosimetry, etc., and from there, they may be released. (Processing through the EWF will be simulated.)

7. Demonstration of the TCP shift change will initiate in the same fashion as the ACP in #5 above. The new shift personnel at TCP (to be determined later) that is evaluated for shift change will handle a traffic impediment (mini-scenario) and then be directed by the NHY Controller to return to the Salem Staging Area, for release.

Section Number: 3.2.7

Methodology Description/Sequence of Events: (continued)

8. Upon termination of the Exercise on Day 1, the NHY Exercise Manager and the FEMA Exercise Director will determine the number of existing TCP/ACPs that were evaluated and establish a monitoring action plan. If there are only a few left (<5) to evaluate then these points will remain staffed. If there are numerous points (>5) to evaluate, then all remaining points will be deactivated and will be evaluated by discussion back at the Staging Area.

9. At Exercise termination time, the FEMA Evaluators/NHYControllers shall return to the Staging Area.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 20

Section Number: 3.2.8

Title: NHY ORO Traffic Impediment Evaluation

State Involved: Commonwealth of Massachusetts (ORO)

Resources To Be Evaluated: Traffic Control Points/Access Control Points, Staging Area, Towing Companies, Evacuation Support Coordinator,

Total Resources Required/Involved: One (1) FEMA Evaluator, NHY Controlling Organization, Road Crews, Route Guides

Sub-category: ORO EOC, Staging Area, TCPs, ACPs, Route Guides, Bus Drivers, Simulated helicopter (Control Cell Command Center input, as necessary)

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 1

Comments: None

Summary: The process of demonstrating appropriate traffic control when traffic impediments occur will be evaluated by the use of mini-scenarios. Mini-scenarios to be controlled by NHY. Road Crews actions to be integrated with this evaluation.

Constraints To Reasonably Achievable:

1. FEMA to provide one (1) impediment evaluator.
2. Impediments to be sequenced in series, in order to be evaluated by the one FEMA Evaluator.
3. In order to ensure public safety, all impediments shall be simulated using props. No actual rerouting of general public traffic will be performed.

Section Number: 3.2.8

Methodology Description/Sequence Of Events:

1. Personnel at TCPs/ACPs or Route Guides are to contact the Staging Area to document times of events (traffic impediments) in order to provide the evaluation process the inputs necessary to demonstrate the applicable objectives.
2. Two (2) impediments will be staged as mini-scenarios. One mini-scenario is to include a traffic reroute. This reroute impediment will be demonstrated at the TCP that will demonstrate the shift change.
3. The preselected mini-scenario will identify the location, approximate time of event, duration of event, and type of impediment.
4. Times of impediments are to be such that one (1) FEMA Evaluator can evaluate all of the impediments for the ORO. (Conducted in a series fashion.)
5. The Control Organization will ensure that all appropriate actions are taken to ensure that all parties (players, observers, evaluators, and controllers) know the identity of impediments.
6. The non-reroute Traffic impediments will be identified by a Route Guide.
7. Non-reroute:
   a) Evaluator to be with tow truck for non-reroute evaluation.
   b) Evaluator to travel from Transfer Point to scene and back to Transfer Point.
   c) NHY Controllers to interject mini scenario.
   d) Items to Evaluate:
      1) Recognition of impediment by Route Guide and appropriate response;
      2) Tow truck interfaces and response.

Methodology Description/Sequence of Events: (continued)

8. Re-route:

a) Evaluator at scene.

b) Impediment identified by TCP due to visual or traffic conditions.

c) NHY Controllers to interject mini scenario.

d) NHY Controlling organization ensures that the impediment is too big to be handled by tow truck. ("I can not do this," is to be the response of the tow truck operator if deployed to the impediment scene.)

e) Items to Evaluate:

1) Identification of impediment and appropriate response:

2) Tow truck interfaces and response: (if this action is taken by players)

3) Re-route planning/conduct.

9. Upon completion of mini scenario, ACP and TCP personnel are directed by the NHY Controller to return to the Salem Staging Area to return equipment, dosimetry, etc., and be released. Processing through the EWF will be simulated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 14

Section Number: 3.2.9

Title: Media Center Inquiries Per Hour

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Media Relations Assistant, Media Relations/Rumor Control Liaison, Public Information Coordinator, Media Relations/Rumor Control Supervisor, Communications, i.e., Joint Telephone Information Center (JTIC) Located at Newington Station

Total Resources Required/Involved: Media Relations Staff, JTIC, Media Center, FEMA Evaluators, NHY Controller Organization

Sub-category: Location of Media Relations Assistants and Supervisor: JTIC; Location of Media Relations/Rumor Control Liaison: Media Center; Location of Public Information Center: EOC

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: Included in number of facility evaluators

Comments: N/A

Summary: The process of demonstrating the ability to manage Media Center Inquiries will be evaluated by FEMA at the JTIC. The NHY ORO Media Relations Assistants will operate from the JTIC and calls from controllers in the NHY Control Cell representing media will exercise this function. NHY Control Cell logs will be collected at the end of each day and copies given to FEMA. *

*Revised June 1, 1988

Section Number: 3.2.9

Constraints To Reasonably Achievable:

1. Number of FEMA Evaluators

2. No public inquiries are to be made since NRC Regulations (10 CFR Part 50, App. E.) call for an exercise without mandatory public participation.

Methodology Description/Sequence Of Events:

This functional area is to be conducted Day 1 and Day 2 only. Prescripted messages are available for NHY control cell use after the initiation of the first news release. A Controller with the Emergency News Manager will inform the Control Cell Lead Controller of the publication of the news release. The Lead Controller will control the flow of the messages to the JTI Center based upon the nature of the event and the content of the prescripted messages. The Lead Controller will adjust the flow of the prescripted messages as the time line and drill sequence of events dictate. Approximately 5 prescripted messages per Media Relations Assistant per hour will be input during the scenario. This pace will continue for approximately three (3) hours after the General Emergency declaration on Day 1. This rate will not be demonstrated on Day 2 although the flow of messages will continue. At the time jump to Day 5, this function will be deactivated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 15

Section Number: 3.2.10

Title: Rumor Control Inquiries Per Hour

State Involved: Commonwealth of Massachusetts (NHY ORO),

Resources To Be Evaluated: Rumor Control Assistant, Media Relations/Rumor Control Supervisor, MR/RC Liaison, PIC, Communications (i.e., Joint Telephone Information Center (JTIC)) Located at Newington Station

Total Resources Required/Involved: FEMA Evaluators, NHY Controller Organization, Rumor Control Staff, JTIC, Media Center

Sub-category: Location of PIC: at Media Center

Location of MR/RC Supervisor: JTIC

Location of MR/RC Liaison: Media Center

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: Included in number of facility evaluators

Comments: N/A

Summary: The process of demonstrating the ability to manage Rumor Control will be evaluated by FEMA at the JTIC. The general public will not be involved in calls to the Rumor Control Assistants, therefore, all calls will be made by Controllers from a Control Cell. These messages are based upon the particular plant ECL and general assumptions on the extent of response. NHY Control Cell logs will be collected at the end of each day and copies given to FEMA. *

* Revised June 1, 1988

Section Number: 3.2.10

Constraints To Reasonably Achievable:

1. The general public will not be involved since NRC regulations (10 CFR Part 50, App. E) call for an exercise without mandatory public participation

2. Number of FEMA Evaluators

Methodology Description/Sequence Of Events: This function is to be conducted on Day 1 and Day 2 only.

Prescripted messages are available for NHY Control Cell use after the initiating event (Alert message). The flow of the messages may commence upon activation of the JTIC and will be closely monitored and administered to reflect as closely as possible real general public inquiries and concerns. The pace of messages will increase at each ECL upgrade until at a General Emergency, approximately 5 rumor inquiries are being made per hour per rumor control staff member. This pace will continue for approximately three (3) hours after the General Emergency declaration on Day 1. The Lead Controller must closely monitor the Rumor Control/Media Relations calls to ensure the flow of messages is consistent with the timeline and sequence of events. The rate of inquiries will not be demonstrated on Day 2 although the flow of messages will continue. At the time jump to Day 5, this function will be deactivated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 11

Section Number: 3.2.11

Title: NHY ORO EBS Station Demonstration: WLYT/WHAV

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Dedicated ringdown telephone circuit (NHY Offsite Response EOC), telefax machines, EBS messages, Public Notification Coordinator, Communication Coordinator, radio station operations

Total Resources Required/Involved: One ringdown circuit, two telefax machines, hard-copy EBS message(s), Public Notification Coordinator, Communication Coordinator, EBS radio station, controllers, FEMA Evaluators

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 1

Comments: N/A

Summary: The process of notifying the public via the EBS network will be actually demonstrated; however, no "emergency" message will be heard by the public. Instead, the public will hear the radio station's weekly EBS network test message. A master tape (or tapes) will be made depicting the stations chronology of the Exercise. Tape recorder to be furnished by FEMA. *

Constraints To Reasonably Achievable:

1. There shall be no impact on members of the general public.
2. Impact on normal operation of EBS station.
3. Actual activation of weekly EBS tone test may occur out of sequence as not to disrupt normal broadcast format.

* Revised June 1, 1988

Section Number: 3.2.11

Methodology Description/Sequence Of Events:

1. The Public Notification Coordinator contacts and telefaxes an EBS Message to the Radio Station or relays which pre-recorded message should be broadcast.

2. A tape will be made of all telefaxed messages, so that FEMA may use it for evaluation of EBS station along with any log that is maintained. This tape may be made out of sequence to accomodate the broadcaster's schedule.

3. At a designated time, the announcer will perform the weekly test of the EBS network, using the two-tone signal and the weekly test message. This test may be out of sequence of the time designated by the NHY EOC in order to fit on the normal broadcasting schedule. This weekly test will be conducted only once.

4. Subsequent to the actual test message demonstration, further EBS participation will be conducted in the same manner as indicated in paragraphs 1 and 2 above..

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 9

tion Number: 3.2.12

Title: NHY ORO EPZ Hospitals

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Special Population Liaisons, Special Population Coordinator, Local EOC Liaison Coordinator, Local EOC Liaisons

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Special Population Liaisons, Special Population Coordinator, NHY Control Cell, FEMA Control Cell, Local EOC Liaisons, Local EOC Liaison Coordinator

Sub-category: Staging Area, Simulated Local EOC's, NHY Offsite Response EOC, NHY Control Cell, FEMA Control Cell

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 1

Comments: N/A

Summary: The process of demonstrating notification and information exchange with EPZ hospitals will be evaluated by FEMA in the Salem, Staging Area and in the NHY Offsite Response EOC. All contacts with EPZ hospitals will be simulated through the use of the NHY Control Cell. Contacts with Local Officials in Local EOC's will be simulated through the use of the FEMA Control Cell.

Constraints To Reasonably Achievable:

1. No Massachusetts EPZ Hospitals are willing to participate in the 1988 evaluated exercise.
2. No Massachusetts Local EOC's are anticipated to participate in the 1988 evaluated exercise.

E/3.2.47

Section Number: 3.2.12

--[redacted]aints To Reasonably Achievable: (continued)

3. The Staging Area in Haverhill, MA may be simulated at Salem, NH.

Methodology Description/Sequence Of Events:

NOTE: FOR PURPOSES OF CONTROLLING THE EXERCISE, THE NHY CONTROLLING ORGANIZATION MAY INTERJECT DATA TO THE OFFSITE RESPONSE EOC FOR APPROPRIATE CONTROL. FIELD DATA AND EOC DATA MAY DIFFER.

1. At the Alert declaration the Special Population Liaisons coordinate those appropriate notifications/information exchange with simulated hospitals (NHY Control Cell). These calls made by the Liaisons will be demonstrated for a period of one (1) hour only.

2. Meanwhile, the Local EOC Liaison Coordinator and Local EOC Liaisons coordinate the task of obtaining authorization and gaining access into the simulated Local EOC's through simulated Local Officials.

3. When authority is given to Liaisons to go to Local EOC's, all Liaisons (Local EOC, Special Population and School) will discontinue any exercise activity and simulate transit to the appropriate Local EOC by traveling to the simulated EOCs (the location of the simulated EOCs has not been confirmed at this point)

* NOTE: Transit times from the Haverhill, MA Staging Area to each Local EOC have been previously documented. This time has been incorporated into the scenario messages for NHY Controllers.

4. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will continue activities while located at the appropriate simulated Local EOC.

Section Number: 3.2.12

Methodology Description/Sequence of Events: (continued)

5. All contacts with Local Civil Defense Officials will be demonstrated via phone link with the FEMA Control Cell as if the Liaisons were making personal contacts in the Local EOC's. Contacts with hospitals will be accomplished by calling the NHY Control Cell.

6. At the Site Area Emergency declaration the Special Population Liaisons will coordinate those appropriate notifications/information exchange with simulated hospitals (NHY Control Cell). The calls made by the Liaisons will be demonstrated for a period of one hour only.

7. At the General Emergency declaration the Special Population Liaisons will coordinate appropriate those notifications/information exchange with simulated EPZ hospitals (NHY Control Cell). The calls made by the Liaisons will be demonstrated for a period of one hour only.

8. At the recommendation of a protective action or upgrade in protective action the Special Population Liaisons coordinate notification exchange with simulated EPZ hospitals (NHY Control Cell). The calls made by the Liaisons will be demonstrated for a period of one hour only.

9. If simulated Local EOC's are recommended to evacuate, as determined by the scenario, all Liaisons (Local EOC, Special Population and School) will discontinue all exercise activity and simulate transit to the Haverhill, MA Staging Area (ref. Seabrook Plan for Massachusetts Communities).

10. When reactivated by the NHY Controller (at completion of appropriate transit) all Liaisons (Local EOC, Special Population and School) will remain at simulation location, however, play as if evacuated from the appropriate Local EOC to the Haverhill facility.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 8

n Number: 3.2.13

Title: NHY ORO Host Hospital Contacts

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Special Population Liaisons, Special Population Coordinator

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Special Population Liaisons, Special Population Coordinator

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: N/A

Summary: The process of demonstrating notification, information exchange and activation of Host Hospitals will be evaluated by FEMA in the Salem, NH Staging Area and the NHY Offsite Response EOC. Participating Host Hospital staffs may be interviewed on the second day at a time that may be out of sequence with the scenario time line. Three Host Hospitals will participate by accepting contacts, providing information on resources available for support, and simulation of providing requested support. Support requirements from non-participating EPZ Hospitals will be simulated with the use of the NHY Control Cell.

Constraints To Reasonably Achievable:

1. Three of the Host Hospitals are willing to participate in the 1988 Evaluated Exercise.

Section Number: 3.2.13

Constraints To Reasonably Achievable: (continued)

2. No Massachusetts EPZ Hospitals are willing to participate in the 1988 Evaluated Exercise.

3. The Staging Area in Haverhill, MA will be simulated at Salem, NH.

4. No Local EOC's in Massachusetts EPZ Communities are willing to participate in the 1988 Evaluated Exercise. Special Population Liaisons will simulate relocation to these EOC's.

Methodology Description/Sequence Of Events:

1. Special Population Liaisons notify simulated Massachusetts EPZ hospitals (Control Cell) and obtain information needed transportation support in the event of an evacuation.

2. Host Hospitals' current bed availability status by medical speciality will be provided to the simulated Massachusetts EPZ Hospital (Control Cell) and to the Special Population Coordinator.

3. All transfers of patients from EPZ Hospitals to Reception Centers and on to Host Hospitals will be simulated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 13 and 14

Section Number: 3.2.14

Title: MS-1 Hospital

State Involved: Commonwealth of Massachusetts - (NHY ORO)

Resources To Be Evaluated: Ambulance and MS-1 Hospital

Total Resources Required/Involved: 1 ambulance, 2 EMTs, FEMA Evaluator, 2 NHY Controllers, MS-1 Hospital, Special Vehicle Dispatcher at Staging Area

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 1 Evaluator

Comments: N/A

Summary: This will be an out of sequence activity on a preselected day as determined by hospital schedule and controlled by a mini-scenario in which an accident victim is injured and potentially contaminated. A message will be given to an ambulance that will be prestaged at the Staging Area. The ambulance will proceed to a preselected location where the accident scene will be simulated. The victim will be stabilized with the EMTs knowledgeable of the potential contamination problem. After emergency care, the victim will be transported to an MS-1 hospital where the victim will be treated and decontaminated if necessary. The mini-scenario for MS-1 hospitals will be the same mini-scenario, in order to provide FEMA a similar evaluation base.

Revised June 1, 1988

Section Number: 3.2.14

Constraints To Reasonably Achievable:

1. Suitable location for simulated accident scene that will not incite local populace.
2. Ambulance crew knowledgeable of contamination control techniques used when conducting emergency care.
3. Actual schedule of Exercise will be dependent on hospital schedule.
4. Brighams and Womens Hospital (MS-1 Backup) will not participate in this Exercise.

Methodology Description/Sequence Of Events:

1. Upon arrival, ambulance crew will be provided vital sign information and proceed to give emergency care. (Mini scenario conduct.)
2. Finish conduct of mini scenario at St. Joseph's Hospital.
3. Post arrival at MS-1 Hospital, ambulance may be terminated from Exercise.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective ..

on Number: 3.2.15

Title: Reception Center Monitoring Trailer, Vehicle Monitoring/Decontamination

State Involved: Commonwealth of Massachusetts (NHY CRO)

Resources To Be Evaluated: Monitoring Facility, Reception Center, Monitoring/ Decontamination Personnel

Total Resources Required/Involved: FEMA EVALUATORS, NHY CONTROLLING ORGANIZATION

Sub-category: Monitoring/Decontamination Personnel

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 1 of 2 per Reception Center.

mments: N/A

Summary: Personnel will be available to simulate evacuees to demonstrate the rate of personnel monitored. Mini-scenarios will be injected by a NHY Controller on a random basis to the evacuees to illicit a response by the players. Mini scenarios will be injected by a NHY Controller for the Monitoring/Decontamination of vehicles process, as well.

tion Number: 3.2.55

aints to Reasonably Achievable:

The number of FEMA Evaluators.

The number of personnel/vehicles arriving at the Reception Center is depen-

dent on the buses sent out and route cycles.

thodology Description/Sequence Of Events:

Facility is fully activated.

Vehicle monitoring will initiate. Personnel will demonstrate at least 10

vehicle surveys are performed per monitor, per facility, per shift.

One out of ten vehicles will be classified as contaminated. Decontamination

will be demonstrated by discussion only.

All 24 personnel monitoring stations are initially activated. Nine are then

shut down leaving five operating to demonstrate an appropriate rate. The

NHY Controller will interject on a random basis that one out of five per-

sonnel will be contaminated. Contamination to be simulated by use of

Coleman mantles both in and out of the package.- Decontamination of those

found contaminated will be demonstrated through discussion only.

Each station will maintain this rate for approximately 20 minutes.

At the shift change, five YAEC mutual assistance personnel will perform the

change at each Reception Center Monitoring Trailer.

The appropriate monitoring rate will be re-demonstrated by each second shift

monitor for approximately 20 minutes.

Clean or decontaminated vehicles after processing may return and be con-

sidered a new vehicle for survey. This process may continue until required

number of vehicles is demonstrated for Monitoring/Decontamination

techniques.

Once these rates and capabilities are performed facility can be deactivated.

* Revised June 1, 1988
# Errata, Rev. 1, July 1988.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 22

Section Number: 3.2.15

Title: Host Facility Contacts

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Assistant Reception Center Coordinator, Host Facility

Total Resources Required/Involved: Fema Evaluator, NHY Controlling Organization, Asst. Reception Center Coordinator, Host Facility

Sub-category: NHY ORO EOC, Host Facility

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource:

Comments: N/A

Summary: The process of demonstrating notification and information exchange with Host Facility will be evaluated by FEMA at the NHY Offsite Response EOC. The Host Facility will receive initial notification of an ALERT condition at Seabrook Station. Subsequent notifications will be simulated through use of the NHY Control Cell. The Host Facility (Shriner's) may be visited/interviewed the second day. This interview may be performed out of sequence with the main time line.

Constraints To Reasonably Achievable:

1. The Host Facility is willing to participate in the 1988 Evaluated Exercise.
2. Evaluation of the Host Facility may occur by interview out of sequence with the scenario time line on the second day.

Revised June 1, 1988

E/3.2.56

Section Number: 3.2.16

Constraints To Reasonably Achieavable: (continued)

3. Regional American Red Cross will not participate. It is planned that they will operate the Host Facility, therefore activation of facility will not occur.

Methodology Description/Sequence Of Events:

1. Following declaration of the Alert emergency classification, the Assistant Reception Center Coodinator will contact and notify the Host Facility. Subsequent contacts and notifications will be simulated through use of the NHY Control Cell.

2. During the period of simulated evacuation of Massachusetts EPZ communities and afterwards (Day 2 and Day 5) NHY Controllers will provide data which will simulate the number of evacuees at the facility.

LUATION WORKSHEET FOR EXTENT OF PLAY Objective 3.2

mber: 3.2.1*

le: NHY CRO CCC Contacts/Referrals

ate Involved: Commonwealth of Massachusetts NHY CRO1

Sources To Be Evaluated: Assistant Reception Center Coordinator, Reception

nters, Congregate Care Centers

tal Resources Required/Involved: FEMA Evaluators, NHY Controller Organization,

sistant Reception Center Coordinator, Reception Center staffs

Sub-category: Reception Center Registration, Congregate Care Referral,

ransportation to Congregate Care Centers.

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 13 *

: N/A

Summary: The process of demonstrating notification, information exchange and referral of evacuees to Congregate Care Centers (CCC) will be evaluated by FEMA in the NHY Offsite Response EOC and Reception Centers. All 26 Congregate Care Centers will receive initial notification of an ALERT condition at Seabrook Station. Subsequent notifications will be simulated through use of the NHY Control Cell. All 26 Congregate Care Centers will be visited and the landlord interviewed regarding preparation for activation. These interviews will be performed out of sequence with the scenario time line on Day 2. Thirteen teams of NHY Controllers and FEMA Evaluators will perform this day 2 out of sequence function by visiting 2 or 3 facilities each. # # *

* Revised June 1, 1988
ata, Rev. 1, July 1988.

E/3.2.5B-ER

Section Number: 3.2.59

Points To Reasonably Achievable:

The exercise scenario time line limits the ability to physically transport simulated evacuees from the Reception Centers to Congregate Care Centers. The Regional American Red Cross is not willing to participate in activation of Massachusetts Congregate Care Centers in the 1988 Evaluated Exercise.

Methodology Description/Sequence Of Events:

1. Following declaration of the ALERT emergency classification, the Assistant Reception Center Coordinator will contact and notify all (26) Congregate Care Centers. Subsequent contacts and notifications will be to simulated Congregate Care Centers through use of the NHY Control Cell.

2. During the period of simulated evacuation of Massachusetts EPZ communities, personnel simulating evacuees will be registered and referred to Congregate Care Centers by Reception Center staffs. The referrals will be reported, as appropriate, to the simulated Congregate Care Centers represented by the NHY Control Cell. Data will be provided by NHY Controllers to simulate Day 2 and Day 5 statistics.

3. The Shriver's Host Facility will be interviewed/evaluated.

4. On Day 2, all remaining (26) CCCs will be evaluated by interviews by FEMA/NHY Controllers.

5. FEMA Evaluators are to receive maps at the Reception Center and then go to their respective CCCs for evaluation purposes.

Section Number: 3.2.17

Methodology Description/Sequence of Events: (continued)

5. The evaluation process will be an interview with the CCC Landlord. This interview is to include a review of plan/procedure and a tour of the facility. Interview duration to be 10-15 minutes.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 15

tion Number: 3.2.18

Title: Emergency Worker and Vehicles Monitoring and Decontamination

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: EWF Monitoring/Decon Personnel

Total Resources Required/Involved: 1 out of 5 for Staging Area FEMA Evaluator.

NHY Controlling Organization, EWF Monitoring/Decon

Sub-category: EWF Trailer, Staging Area

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource:

Comments: N/A

Summary: Mini-scenarios will be injected by the NHY Controller on a random basis of emergency workers. Route Guides remaining at the Staging Area may be used to demonstrate the EWF's capabilities.

Constraints To Reasonably Achievable:

1. FEMA to provide 1 evaluator.
2. The Staging Area in Haverhill, Massachusetts will be simulated at Salem, NH.
3. Shift change will not be demonstrated.

Methodology Description/Sequence Of Events:

1. Evaluators are to inspect the monitoring of emergency workers.
2. The NHY Controller will inject on a random basis that two out of five personnel will be contaminated. Contamination to be simulated by Coleman mantles both in and out of the package. Decontamination of those found contaminated will be demonstrated through discussion only.

* Revised June 1, 1988

Section Number: 3.2.18

Methodology Description/Sequence of Events: (continued)

3. Monitoring of ten (10) vehicles per monitor per shift will be demonstrated. One of every 10 vehicles will be determined to be contaminated by interjection of a mini-scenario by the NHY Controller. Decontamination of those found contaminated will be demonstrated through discussion only.

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 5

Action Number: 3.2.19

Title: ORO Dosimetry/KI

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Dosimetry/KI for "non-movable", mobility-impaired population

Total Resources Required/Involved: 1 FEMA Evaluator, 1 personal vehicle, 1 Route Guide, 1 ORO Controller, 12 sets dosimetry, 12 vials KI.

Sub-category: NHY Offsite Response EOC, ORO Staging Area, simulated hospital (Control Cell)

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 2

Comments: Hospitals in Massachusetts portion of EOC are non-participants. The information on the number of patients who will shelter in place will originate with the NHY Phone Cell.

Summary: Demonstration of the process by which dosimetry and KI needs for patients/staff and for home bound mobility impaired who do not evacuate are defined. One simulated EPZ hospital (Amesbury Hospital) will call the Amesbury Special Population Liaison to relay that four patients cannot be evacuated and that six staff are remaining behind. This information will be processed through the EOC, culminating in dispatch of a route guide to pass by the actual hospital parking lot with the required dosimetry/KI. Occuring separately are two mobility impaired homebound persons who also require KI and dosimetry.

Constraints To Reasonably Achievable:

1. Availability of FEMA Evaluator.

Section Number: 3.2.19

Constraints To Resonably Achievable: (continued)

2. Neither hospital participating.

Methodology Description/Sequence Of Events:

1. The Control Cell Command Center, simulating Amesbury Hospital, contacts the Amesbury Special Population Liaison with the number of patients/staff not evacuating following the hospital notification of evacuation PAR.

2. Route Guide is briefed, obtains 10 vials KI, 10 sets dosimetry, and is dispatched to Amesbury Hospital parking lot accompanied by ORO Controller and FEMA Evaluator.

3. After discussing actions to be taken at hospital, (i.e., proper person to whom dosimetry/KI is to be delivered), Route Guide returns to Staging Area through EWF.

The NMY Control Cell will interject that (2) mobility-impaired persons have refused to evacuate. These individuals are:

A. Albert Mathieu
20 Hoyt Avenue
Amesbury, MA 01913

B. Marion F. Miller
47 Hill Street
Newburyport, MA 01950

5. Route Guides (2) will be dispatched to these locations validating familiarity and will issue KI and dosimetry to the accompanying FEMA Evaluator demonstrating issuance capability.

6. Actual contacts with homebound persons will not occur.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective _____ **

Section Number: 3.2.20

Title: NHY ORO PANS (VANS)

State Involved: Commonwealth of Massachusetts - (NHY ORO)

Resources To Be Evaluated: Public Alert and Notification System VANS

Total Resources Required/Involved: Four (4) FEMA Evaluators, Six (6) NHY Controllers, Sixteen (16) radios

Sub-category: VANS Staging Areas, VANS Vehicles (Simulated) Assigned Acoustic Locations

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 4

Comments: N/A

Summary: The dispatch of simulated VANS vehicles to assigned acoustic locations will be evaluated by (4) FEMA Evaluators and (6) NHY Controllers. All VANS Operators will be evaluated by FEMA Evaluators to determine their extent of knowledge relative to VANS operations and procedural compliance.

Constraints To Reasonably Achievable:

1. The lack of legal authority to actually sound sirens in Massachusetts.
2. No actual VANS vehicles will be used offsite for this objective demonstration due to possible public impact.
3. Four FEMA Evaluators will be provided.
4. No siren activation will take place.

** Revised June 14, 1988

Section Number: 3.2.20

Simulated Sequence of Events:

1. No shift change will take place.

2. Four (4) Simulated VANS vehicles will be similar in size as actual VANS vehicles. The other twelve (12) vehicles will be personal vehicles.

3. The FEMA Evaluators and NHY Controllers will stage at the VANS Staging Areas. Upon deployment, the FEMA Evaluators and NHY Controllers will accompany four of the simulated VANS vehicles to assigned acoustic locations. These sites are to include the two longest timed and the two longest distanced locations from the site.

4. VANS Operators will travel to assigned acoustic locations. Upon arrival, operators will simulate placing the vehicle in an "operable position" through discussing the applicable procedure(s).

5. An evaluation will include discussion of arrival times, system familiarity, dosimetry, equipment, radios and system operation.

6. Upon completion of the evaluation by FEMA, the VANS personnel will be released from participation in the Exercise.

7. The FEMA Evaluators/NHY Controllers will conduct evaluations of the other 12 acoustic locations until all VANS personnel have been evaluated.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 3

Section Number: 3.2.21

Title: ORO Recreation Facilities

State Involved: Commonwealth of Massachusetts - (NHY ORO)

Resources To Be Evaluated: Public facilities, DOI, private (seasonal and transient) campgrounds and children's camping facilities.

Total Resources Required/Involved: FEMA Evaluators, DOI, NHY Controlling Organization

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments:

Summary: Transients at public and private campgrounds are considered part of the general population. Appropriate protective actions for these facilities will be simulated. Notification to the Department of the Interior (DOI) will be demonstrated, and may be observed at the NHY Offsite Response EOC.

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.

Methodology Description/Sequence Of Events:

1. The initial notification to DOI will be conducted per procedure and evaluated by FEMA. Demonstration of procedures by DOI will be conducted by interviews with the DOI personnel and actual running of notification routes with simulated notification to public. No actual notification will be made to the public in the Parker River Wildlife Refuge.

2. All subsequent contacts and notifications to the Department of the Interior will be simulated through contact of the NHY Control Cell.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 37, 2 *

Section Number: 3.2.22

Title: Control Cell Command Center (CCCC)

State Involved: New Hampshire, Commonwealth of Massachusetts (NHY ORO), Maine

Resources To Be Evaluated: Simulated non-participating organizations/agencies; data needed to drive scenario; and NHY control of the scenario.

Total Resources Required/Involved: NHY Controller Organization, FEMA Control Cell Controllers, physical location (stack a shack) large enough to house the identified simulated non-participating organizations/agencies.

Sub-category: CCCC

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 9

Comments: N/A

Summary: NHY proposes that FEMA and NHY set up a CCCC that simulates non-participating organizations/entities. Presently the CCCC has been set up at Seabrook Station.

Constraints To Reasonably Achievable:

1. Number of FEMA Evaluators available.
2. Identification of non-participating agencies, as identified below.
3. No public contact/impact.

* Revised June 1, 1988

Methodology Description/Sequence Of Events:

1. The number of FEMA Evaluators for the CCCC has been pre-established at nine. In addition to FEMA the NRC would like to utilize an Advisor in the FEMA Control Cell.

2. A number of NHY Controllers are to be identified and staffed in accordance with Section 4.0 of the scenario.

3. FEMA Evaluators and NHY Controllers shall receive or have applicable training to ensure Exercise control.

4. All FEMA Evaluators/Controllers shall comply with instructions from NHY Controllers and the FEMA Exercise Director. No actions will be taken that impact the intent or extent of play.

5. General controller play/instructions are to be complied with as listed in Section 4.0 of the exercise scenario.

6. One control cell representing non-participating government organizations will be established to communicate with officials at the Offsite Response EOC.

7. Commonwealth of Massachusetts and the American Red Cross positions are to be simulated by FEMA at the CCCC: Position identified as A through J will be simulated by FEMA. all others by NHY Controllers. *

   A. Governor of Massachusetts or designee.

   B. Director of the Massachusetts Civil Defense Agency and Office of Emergency Preparedness.

   C. Massachusetts Department of Public Health's Director of the Radiation Control Program.

* Revised June 1, 1988

Methodology Description/Sequence of Events: (continued)

D. Amesbury - Chairperson of the Board of Selectmen

- Civil Defense Director

- Other local departments as necessary

E. Merrimac - Chairperson of the Board of Selectmen

- Civil Defense Director

- Other local departments as necessary

F. Newbury - Chairperson of the Board of Selectment

- Civil Defense Director

- Other local departments as necessary.

G. Newburyport - Chairperson of the Board of Selectmen

- Civil Defense Director

- Other local departments as necessary

H. West Newbury - Chairperson of the Board of Selectmen

- Civil Defense Director

- Other local departments as necessary

I. Salisbury - Chairperson of the Board of Selectmen

- Civil Defense Director

- Other local departments ar ecessary.

J. American Red Cross *

K. Director AREA 1 MCDA

L. Massachusetts State Police

* Revised June 1, 1988

Methodology Description/Sequence of Events: (continued)

M. Non-playing Schools, Special Facilities, Nursing Homes, Special Populations, Day Care Centers, and Hospitals

N. Bus yards and Bus Companies (CCCC may simulate play post initial notification)

O. Tow Truck Companies (CCCC may simulate play post initial notification)

P. Ambulance Companies (CCCC may simulate play post initial notification)

Q. Congregate Care Centers (CCCC to simulate play post initial notification)

R. Host Facility (CCCC may simulate play post initial notification)

S. Host Hospitals (CCCC to simulate non-playing or may play post initial notification to those participating)

T. Non-playing support resources: helicopter companies, snow removal.

8. Federal Positions to be simulated by NHY:

A. Department of Energy, as required.

B. Department of Agriculture

C. Department of Commerce

D. Department of Housing and Urban Development

E. U.S. Coast Guard, as required

F. FAA, as required

G. FEMA

H. NRC Region 1 (CCCC to demonstrate unless simulated by a Controller as a Player)

I. NRC ENS Line (Emergency Notification System)

J. NRC HPN Line (Health Physics Network) (CCCC to demonstrate unless simulated by a Controller as a Player)

Methodology Description/Sequence of Events: (continued)

K. Environmental Protection Agency (EPA)

L. DOI (CCCC to simulate play post initial notifications)

9. Other Outside Agencies to be simulated by NHY: (CCCC to demonstrate unless simulated by Controller as a Player)

A. INPO

B. Westinghouse

C. Other Vendors

D. New England Compact

E. PSNH Corporate Headquarters

F. ANI

G. Control Room (Day 2)

H. TSC (Day 2)

I. OSC (Day 2)

J. YAEC Engineering Support Center (Day 2)

10. Information to be provided by scenario in form of messages.

A. This information is used for preplanned scenario play.

B. Information regarding requests that are not preplanned will be identified to the Lead Controller.

C. Lead Controller interfaces with the Exercise Manager to provide the appropriate response.

11. Special Exercise phone numbers will be provided for the players and controllers.

12. In order to provide correct information plans, procedures and/or reference material may be available for positions that are being simulated.

Methodology Description/Sequence of Events: (continued)

13. All information that the controllers require should be previously identified.

14. Appendices "M", "L" and "H" for NHY ORO information will be made available to the CCCC controllers.

15. Formal logs/records are required denoting times, contacts, message content and responses. Logs, messages, and other CCCC information will be required by FEMA Evaluators for evaluation at the end of each day. *

16. Those Players/Functions to be simulated should be identified prior to the Exercise in order to ensure adequate preparation time.

17. Calls at the CCCC can be incoming and/or outgoing.

18. All messages will be previously developed unless acknowledged by the Lead Controller.

19. Controllers will NOT make decisions for the players or prompt the players to make particular decisions unless directed by the Lead Controller for purposes of maintaining the scenario.

20. Simulated positions will NOT assume any command and control authority from the ORO.

21. Simulated positions will NOT interact with members of the public so as to lead someone to believe that you are actually a State or Local Official.

22. Simulated positions may concur with requests for implementation of actions that require legal authortiy to implement in order to demonstrate pertinent portions of the response capability.

23. Control Cell Lead Controller will periodically confer with Facility Leaders to ensure inconsistencies are not being created. (Players response differed from scenario assumptions.)

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 27

Section Number: 3.2.23

Title: NHY ORO IEPZ Sample Collection Teams

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Sample Collection Coordinator, Sample Collection Teams

Total Resources Required/Involved: 6 FEMA Evaluators, 6 NHY ORO Controllers

Sub-category: NHY ORO EOC, Staging Area

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 6

Comments: N/A

Summary: Once the ORO Field Team Dispatcher has defined the Day 2 sample collection team locations, he will receive a message from the Lead EOF Radiological Assessment Coordination Controller superceding sample plan requirements and directing him to send two (2) sample teams to pre-designated sample collection locations. These teams will obtain the required samples out of sequence from the rest of the exercise. The four (4) remaining teams will continue to support the scenario as conditions warrant. Samples will be packaged and logged. Data from the NHY Controllers in the EOC and EOF will be provided, as though the teams had adhered to the scenario-dictated sample plan.

Constraints To Reasonably Achievable:

1. Identified sample locations in unavailable area.
2. Special circumstances arise negating use of identified sample forms.

Methodology Description/Sequence Of Events:

Sampling techniques will be demonstrated as follows:

1. ORO Field Team Dispatcher will define the Day 2 sample collection team locations per scenario. Once this is accomplished the Lead EOF Radiological Assessment Coordinator Controller will present a message that supercedes these planned locations and directs him to assign two (2) teams to the following area for actual out of sequence sample collection.
2. Those two (2) teams will be directed to participating farms to collect required samples, i.e., milk, vegetation, seasonal crops, (examples included but are not limited to strawberries, raspberries, and asparagus) water, soil.

   NOTE: ONLY THE MILK SAMPLE MAY ACTUALLY BE ALLOWED OR AVAILABLE. IF THIS EXISTS THEN THOSE OTHER SAMPLES WILL BE COLLECTED AT THE NEAREST ACCEPTABLE LOCATION (possible a U-Pick Farm).
3. One team will go to the Rogers Spring Hill Dairy on Neck Road, Haverhill, Massachusetts.
4. The other team will go to the Bartlett Dairy Farm located on Congress Street in Salisbury, Massachusetts.
5. These two teams are playing out of sequence to the scenario timeline.
6. Where those teams are directed to locations to perform environmental sampling in areas that this is not achievable, alternate locations will be picked to complete this demonstration.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 34

Section Number: 3.2.24

Title: Shift Turnover with YAEC Mutual Assistance

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Reception Center staff at Beverly and North Andover

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Reception Center Staff, YAEC Mutual Assistance responders.

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource:

Comments: N/A

Summary: The process of a shift turnover for the positions of Traffic Guides, Reception Center Monitoring/Decon personnel and Reception Center staff will be demonstrated with personnel responding from activation of YAEC Mutual Assistance Program, but is limited to the following extent:

Traffic Guides - 5 personnel at the designated ACP or TCP

Monitoring/Decon - 5 personnel at each Reception Center Monitoring Trailer

Reception Center Staff - 5 personnel at one Reception Center

- 4 personnel at the other Reception Center *

Constraints To Reasonably Achievable:

Availability of YAEC Mutual Assistance Response personnel, in a non-emergency situation.

* Revised June 1, 1988

Methodology Description/Sequence Of Events:

Upon activation of the YAEC Mutual Assistance Program, responders for the second shift (only those 24 personnel previously identified) will report to the Salem Staging Area for their briefings. *

The conduct of the shift turnover for the Traffic Guides will be as described in Section 3.2.7. The conduct of the shift turnover for the Reception Center Monitoring/Decon staff will be as described in Section 3.2.15. The (9) Reception Center staff personnel will be directed to either the North Andover or Beverly Reception Center at which the turnover briefings will be demonstrated. All other first shift responders remain in place until the close of the exercise for the Reception Centers. *

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 28 *

Section Number: 3.2.25

Title: NHY ORO Laboratory Operations

State Involved: Commonwealth of Massachusetts (NHY ORO)

Resources To Be Evaluated: Environmental Laboratory

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, YAEC Lab, Westboro, MA.

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 1

Comments: N/A

Summary: This evaluation will be performed out of sequence from the scenario timeline. The evaluation will commence when samples are delivered to the laboratories. Evaluation to include screening, packaging, labeling, logging, and appropriate contamination controls up to the point of determining sample geometry. Discussion of procedures will follow. Actual counting will not take place. Controllers will provide sample results. Evaluation to include sample results processing.

* Revised June 1, 1988

Constraints To Reasonably Achievable: *

1) Availability of sample media.

2) Number of FEMA Evaluators

Methodology Description/Sequence Of Events:

1) Evaluation to be conducted out of sequence from the scenario timeline.

2) Evaluation commences upon arrival of samples (provided by NHY Controlling Organization). Samples will include one (1) of each medium (water, milk, soil, grass, strawberries, asparagus and raspberries).

3) Samples to be screened, packaged, labelled and appropriately logged.

4) Evaluators/Controllers may question the laboratory staff on processing of samples.

5) Sample preparation and analysis instrumentation are set up for counting (appropriate geometry). Actual counting will not take place.

6) The NHY Controlling Organization will provide results upon completion of simulated counting and counting process evaluation.

7) Result processing will be part of the evaluation.

* Revised June 1, 1988

1988 FEMA GRADED EXERCISE

SEABROOK STATION

SECTION 3.3

SUMMARY OF NEW HAMPSHIRE RADIOLOGICAL EMERGENCY RESPONSE ACTIVITIES

SECTION 3.0

SUMMARY OF THE STATE OF NEW HAMPSHIRE

RADIOLOGICAL EMERGENCY RESPONSE ACTIVITIES

The worksheets included in this section provide a summary of the specific process to be demonstrated for each radiological emergency response functional area identified. Additionally, the worksheets include:

- the actual degree of simulation as it may be restricted by identified constraints, if applicable; and
- the proposed evaluation process to be used for each functional area demonstration.

Table 3.3-1 provides an index of the functional areas included in this section.

TABLE 3.3-1

NEW HAMPSHIRE

FUNCTIONAL AREA INDEX

SECTION	FUNCTIONAL AREA
3.3.1	School Contacts
3.3.2	Day Care Center Contacts
3.3.3	Special Populations
3.3.4	EPZ and Host Nursing Home
3.3.5	NH EPZ Recreation Facilities
3.3.6	NHRERP Local and Host Community EOC's
3.3.7	NHRERP Transportation Resources
3.3.8	NH Ambulance Contacts
3.3.9	Traffic and Access Control Points
3.3.10	Traffic Impediment Evaluation
3.3.11	NH Media Center Inquiries Per Hour
3.3.12	NH Rumor Control Inquiries Per Hour
3.3.13	Emergency Management EBS Station Demonstration; WOKQ
3.3.14	IFO Special Assistance Lines
3.3.15	EPZ and Host Hospitals
3.3.16	Management of Contaminated and Injured Patients
3.3.17	NH Congregate Care
3.3.18	NH Alert and Notification System
3.3.19	NHRERP Host Community Reception Centers and Decontamination Facilities
3.3.20	NH EPZ Sample Collection Team
3.3.21	Laboratory Operations

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 19

Section Number: 3.3.1

Title: School Contacts (Command & Control)

State Involved: New Hampshire

Resources To Be Evaluated: State EOC, Local EOCs, IFO

Total Resources Required/Involved: FEMA Evaluators, NHY Controllers, 5 School Superintendents, 35 Public Schools, 10 Private Schools

Sub-category: State EOC Department of Education Representative, Local EOC School Contacts, IFO Liaisons (for non-participating towns)

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of evaluators allotted for applicable facilities.

Comments: N/A

Summary: Participating school superintendents and school principals will be contacted by the State and Local EOC representatives for the initial notification. Subsequent calls for Emergency Classification Level changes and Protective Action Recommendations will be made to those schools that agree to further exercise participation. If no contact is made, default values may be used for assessing transportation needs. Protective action implementation internal to the schools will be simulated. Specifics on field activities are included in Section 3.3.7 (Transportation Resources).

Constraints To Reasonably Achievable:

1. Availability of Controllers/Evaluators.

2. Willingness and/or availability of school personnel to support non-emergency activities (exercise)

Methodology Description/Sequence Of Events:

1. FEMA has evaluators at State EOC, State IFO, and Local EOCs.

2. State DOE Representative contacts all affected School Superintendents in EPZ and Host Towns.

3. Local EOC School Representative Contacts will contact affected school superintendents or principals.

4. Participating School Superintendents will contact the appropriate schools in their districts per their procedures.

5. A list of school census data information provided by School Superintendents will be given as scenario data live to the IFO and Local EOCs.

6. If a contact cannot be appropriately made, default values from plans and and procedures will be used.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 19

Section Number: 3.3.2

Title: Day Care Center Contacts (Command & Control)

State Involved: New Hampshire

Resources To Be Evaluated: State EOC. Local EOC's. IFO

Total Resources Required/Involved: FEMA Evaluators and NHY Controllers for applicable facilities: participating day care centers

Sub-category: NHDPHS Child Care Licensing Bureau at State EOC: Local EOC Transportation Coordinator: IFO Liaisons

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of evaluators allotted for applicable facilities.

Comments: None

Summary: All Day Care Center operators will initially be contacted by the State and Local EOC representatives for transportation needs. Subsequent notification for ECL changes and PARs. will be made to those Day Care Centers that agree to further exercise participation. If no contact is made. default values will be used for transportation needs. Specifics on field activities are included in Section 3.3.7 (Transportation Resources). Appropriate protective actions for these facilities will be simulated.

Constraints To Reasonably Achievable:

1. Availability of Controllers/Evaluators.
2. Willingness of day care center officials to support non-emergency activities (exercise).

Methodology Description/Sequence Of Events:

1. FEMA has evaluators at State EOC. State IFO. and Local EOC's.

Section Number: 3.3.2

Methodology Description/Sequence Of Events: (continued)

2. Local EOC School REP Contacts and DPHS Day Care notification personnel will contact affected Day Care Centers.

3. Due to compressed time and high number of Day Care Centers, Controllers may authorize simulation of follow-up/ECL change calls/notification.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.3.3

Title: Special Populations

State Involved: New Hampshire

Resources To Be Evaluated: Local EOCs and State IFO Local Liaisons

Total Resources Required/Involved: 12 (approximately) of 17 Local EOCs; IFO Local Liaisons as required by the RERP; NHY Control Cell; 1 Wheelchair van (see Transportation Resources); one volunteer to simulate transport of a mobility-impaired individual.

Sub-category: NHOEM Special Needs Survey results.

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: This category consists of approximately 265 individuals in 17 EPZ communities identified during the NH Office of Emergency Management's annual Special Needs Survey as being in need of some form of special assistance during an actual emergency evacuation, i.e., special transportation arrangements. Although pre-identified, these individuals are contacted during the early stages of an emergency to determine if they still require the type of assistance originally indicated. If so, these requirements are factored into evacuation resource mobilization at the State EOC and resource deployment through the State IFO and State and Local Transportation Staging Areas.

Summary: Confirmation calls approximating the number of special needs requests anticipated per town will be made by Town Transportation Coordinators and IFO Local Liaisons to the NHY Control Cell demonstrate the functional operation of this concept. These calls will be made only once.

Summary: (continued)

Scenario-generated (NHY Control Cell) data from these calls will be fed into the resource calculations and used during resource deployment demonstrations, as appropriate, at the State Staging Areas and in each community.

The actual demonstration of this function will be limited to the controlled deployment of a wheelchair van to a predetermined EPZ location (see Mini-Scenario NH 20-2) for the simulated transport of a mobility-impaired individual from his home to a reception center.

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.
2. The number of NHY Controllers/volunteers available.
3. No public interface, all calls will be made to the NHY Control Cell.

Methodology Description/Sequence Of Events:

1. Special needs requests provided by the NHY Control Cell for each call will be received at each Local EOC and at the State IFO and fed into the evacuation transportation functions at the State EOC and the State Transportation Staging Areas.
2. A controller will provide instructions to deploy a wheelchair van to a predetermined locality for the purpose of addressing a special needs request.

* Revised June 1, 1988

Methodology Description/Sequence Of Events: (continued)

3. In one pre-designated community, a controller will provide the local transportation coordinator with instructions to deploy an assigned wheelchair van to a predetermined location to pick up a mobility-impaired individual and transport him to a Reception Center.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.3.4

Title: EPZ and Host Nursing Homes

State Involved: New Hampshire

Resources To Be Evaluated: EPZ nursing homes. Local (EPZ) EOC's. DPHS

Total Resources Required/Involved: FEMA Evaluators. NHY Controllers. EPZ Nursing Homes. Local (EPZ) EOC's. DPHS.

Sub-category: Evacuation Bed (Special Needs Conversion) Buses

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: N/A

Proposed NH Solution

Summary: Participating nursing homes will simulate internal emergency response activities so as to minimize disruption of routine health care services during the exercise. Two participating nursing homes will be selected to demonstrate the special needs evacuation bed bus conversion system. Demonstration of the notification of EPZ Nursing homes and the required exchange of information will be demonstrated at the applicable Local EOC's and the IFO. For Nursing Homes not willing to participate throughout the exercise day, only the initial notification call will be made. Notification and information exchange with host Nursing homes willing to participate will be demonstrated by their interaction with the participating EPZ nursing homes. For non-participating Host Nursing Home space availability will be as identified in the NHRERP.

Section Number: 3.3.4

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.
2. The number of NHY Controllers available.
3. Potential disruption of health care services delivery in a non-emergency situation.
4. Willingness of nursing home administration to participate.

Methodology Description/Sequence Of Events:

1. Each of the impacted Nursing homes notifies its designated host facilities.
2. No ambulances will be dispatched to participating nursing home facilities. (See Transportation Resource and Ambulance Contact evaluation sheets.)
3. School buses designated for use as special needs conversion bed buses will be dispatched to two participating, pre-designated nursing homes for a demonstration of the process of installing the bed conversion kits in the vehicles by nursing home staff. No patients will be transported. Demonstration of bed conversion kits may be out of sequence. #

Errata, Rev. 1, July 1988.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 3

Section Number: 3.3.5

Title: NH EPZ Recreation Facilities

State Involved: New Hampshire

Resources To Be Evaluated: Public facilities under the jurisdiction of the Department of Resources and Economic Development (DRED parks, campgrounds, beaches); private (seasonal transient) campgrounds and children's camping facilities.

Total Resources Required/Involved: Exercise participation limited to appropriate notification

Sub-category: Precautionary beach closing procedures by DRED.

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: No additional required.

Comments: N/A

Summary: RERP procedures for these facilities fall into several different categories. Specific state park/beach closing provisions are incorporated in DRED procedures. Transients at public and private campgrounds are considered part of the general population. Camps catering to children on a day or overnight basis have procedures for advising town officials if they require evacuation transportation assistance.

Summary: (continued)

Initial notification will be provided in accordance with REPP procedures for all recreational facilities open for the season on the date of the exercise. Subsequent notifications for changes in ECLs and PARs will be provided to those facilities willing to participate further on the exercise date. If no contact is made, default values may be used for assessing transportation needs. Appropriate protective actions for each facility will be simulated. The notification process is demonstrated and may be observed at the State EOC and IFO and at each participating local EOC.

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.
2. Some recreational facilities may not be in full operation during the exercise due to seasonal conditions.
3. Some facilities may not be impacted under the scenario conditions.

Methodology Description/Sequence Of Events:

1. Notification capability is demonstrated by player actions at the State EOC and IFO and at each participating local EOC.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 1 & 3.4

Section Number: 3.3.6

Title: NH RERP Local and Host Community EOC's

State Involved: New Hampshire

Resources To Be Evaluated: EPZ Town Emergency Operations Centers and Host Community Emergency Operations Centers

Total Resources Required/Involved: 12 (approximately) of 17 Local EOC's and 4 of 4 Host Community EOC's. Staffing as defined in the appropriate EPZ Town and Host Community RERP.

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 21 *

Comments: As of this date, 12 of the 17 EPZ communities and 4 Host Communities have indicated a willingness to participate, in RERP activities.

Proposed Solution

Summary: Implementation of the NH RERP is not dependent upon full local participation. Procedures exist for the state to exercise compensatory actions if an EPZ community is unable to respond during an emergency. Notifications will be provided to all participating EPZ communities in the FEMA graded exercise, and those participating will open and staff EOC's with sufficient personnel to demonstrate their RERP responsibilities. Those communities declining participation will be exercised to the extent consistent with the NH RERP compensatory procedures including the dispatch of Sheriff's Deputies to man local transporation staging areas.

Shift turnover (11 of 17 Local EOCs) will demonstrate the capability to provide 24-hour coverage of EOC responsibilities. Sheriff's Deputies are not required to do a shift turnover. *#

* Revised June 1, 1988
# Errata, Rev. 1, July 1988.

Constraints To Reasonably Achievable:

1. The number of FEMA evaluators available.
2. The number of controllers required to oversee EOC operations.
3. Cooperation of local elected officials.
4. Availability of local emergency response personnel due to a real emergency situation during the exercise.
5. Availability of local volunteer emergency response personnel for a non-real emergency and more pressing commitments.

Methodology Description/Sequence Of Events:

1. FEMA will provide evaluators to observe EOC operations in all participating EPZ and Host Communities.
2. Observation of EOC-related activities for non-participating EPZ communities will be conducted at the IFO in Newington and at local TSAs in non-participating communities. *

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.3.7

Title: NHRERP Transportation Resources

State Involved: New Hampshire

Resources To Be Evaluated: School Buses, Ambulances, Vans, Wheelchair Vans, Special Needs Buses, Emergency Driver Pool

Total Resources Required/Involved: 17 FEMA Evaluators, 20 buses (18 regular buses and 2 special needs (conversion bed) buses (must be school buses), 1 ambulance, 1 wheelchair van, 21 bus drivers, one ambulance crew (driver and EMT), arrangements with three or more of the 18 bus providers and one of the 16 ambulance companies, and 20 members of the Emergency Driver Pool and their personal vehicles.

Sub-category: Facilities: State EOC, State JFO, two State Transportation Staging Areas, local Transportation Staging Areas. Personnel: Emergency Driver Pool.

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 17

Comments: FEMA agreed at the 4/20/88 meeting to allow the contracting of transportation resources for use in the exercise to demonstrate the functional capability of the RERP. Routes actually run will be accomplished by use of contracted vehicles and by use of the Emergency Driver Pool.

Summary: Sufficient contracted resources will be made available during the exercise to demonstrate the functional capability of the evacuation transportation concept. Actual supply/demand calculations will be made per RERP procedures.

Summary: (continued)

However, for the exercise, the number of vehicles mobilized at the State Transportation Staging Areas will be a portion of the total resources required in an actual emergency situation. The evacuation resources are pre-assigned to schools, day care centers, nursing homes, towns, etc. It is those facilities/locations to which buses, vans and ambulances will be dispatched for purposes of evaluation. On day 2 (out of sequence) Emergency Driver Pool personnel (23) will be evaluated by FEMA and NHY Controllers. NOTE: Buses will run throughout the entire EPZ even if this is not the PAR established at the State EOC. Field and EOC data may differ.

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.
2. The number of controllers required for each vehicles.
3. The cost of renting vehicles for a non-emergency situation.
4. The impact on public safety of taking ambulances out of service to participate in the drill.
5. The EPZ-wide distribution of participating facilities.
6. Availability of Emergency Driver Pool drivers in a non-real emergency.

NOTE: DEMONSTRATION OF THE AMBULANCE RESOURCE MAY BE CONDUCTED OUTSIDE OF THE SCENARIO TIME LINE AS APPROPRIATE TO ALLOW THE RETURN OF THE VEHICLE AND CREW TO SERVICE IN A TIMELY MANNER.

Methodology Description/Sequence Of Events:

1. 20 contracted buses, one ambulance, and one wheelchair van, each with a driver, and 23 individuals in private vehicles will actually run routes during the exercise. The 23 individuals, in private vehicles, will be evaluated day 2 out of sequence.

Methodology Description/Sequence of Events: (continued)

2. Contracted vehicles will be assigned as follows (see attached list for specific routes to be run):

   A. 10 buses for bus routes for the general public

   B. 5 buses for public and private schools

   C. 3 buses for Day Care Centers

   D. 1 for handicapped (wheelchair van)

   E. 1 ambulance for vehicle processing demonstration only at the Rockingham Transportation Staging Area

   F. 2 for Nursing Homes or (Special Needs/Conversion Bed) (Must be school buses)

3. Dispatch of the vehicles will be driven at the State and local Transportation Staging Areas by input provided by NHY Controllers.

4. In the event a vehicle requires refueling during the exercise, this will be demonstrated only at the State Transportation Staging Area in Brentwood in accordance established RERP procedures by directing the vehicle(s) to a designated fuel provider. If no vehicle entering the State TSA in Brentwood during the exercise requires refueling, controllers will inter-ject play, via a mini-scenario, to send one vehicle for refueling.

5. The State TSA at Portsmouth Circle Business Center in Portsmouth will, at a minimum, be partially activated at the discretion of the State EOC.

6. Upon mobilization by the State EOC Resources Coordinator, the NHY Controller Organization will direct that contracted vehicles and drivers be directed to the State Transportation Staging Areas at the Rockingham County Complex (14 buses, 1 wheelchair van, 1 ambulance) in Brentwood and the Portsmouth Circle Business Center (6 buses) in Portsmouth.

Methodology Description/Sequence Of Events: (continued)

7. Upon direction from the State EOC and IFO to dispatch vehicles, TSA coordinators will be given assignments by NHY Controllers for the distribution of all 20 vehicles to the Community (Local) Transportation Staging Areas. On day 2 the 23 people from the Emergency Drivers Pool in private vehicles will be evaluated. Emergency Pool Drivers, FEMA Evaluators and NHY Controllers will meet at the State Transportation Staging Area in Brentwood at 08:30 a.m. No dosimetry will be issued. Route assignments will be given to the drivers at this time by the NHY Controller. Routes will not include travel to Reception Centers. Travel to Host Health Care Facilities will be to the extent possible within time limitations. In addition, for Portsmouth Facilities located inside Pease AFB, vehicles will only be expected to locate the AFB entrance gates, as access is controlled. Upon completion of routes, the Driver, Evaluators and Controller return to the State Transportation Staging Area in Brentwood. Upon arrival at the Staging Area, drivers will be dismissed from exercise activities.

8. At the Local Transportation Staging Areas, NHY Controllers will provide local staging area coordinators with instructions for the deployment of the contracted vehicles.

9. Each of the vehicles will complete the assignment as outlined by the instructions. The FEMA Evaluator and NHY Controller will accompany each contracted vehicle from its origination at the State Transportation Staging Area through the completion of the vehicle's assignment and its return to the State TSA.

NOTE: DEMONSTRATION OF THE AMBULANCE RESOURCE MAY BE CONDUCTED OUTSIDE OF THE SCENARIO TIME LINE AS APPROPRIATE.

* Revised June 1, 1988
** Revised June 14, 1988

BUSES AND CONTRACTED VEHICLES WILL BE ASSIGNED AS FOLLOWS:

DAY NUMBER 1

TOWN	WAVE	ASSIGNMENTS
Seabrook	A	Rockingham TSA to LSA then 1 bus to run 4 bus routes then to Salem Reception Center, then to Rockingham TSA.
	A	Rockingham TSA to LSA then 1 bus to Seabrook Elementary then to Salem Reception Center, then to Rockingham TSA.
	A	Rockingham TSA to LSA then 1 wheelchair van (mini-scenario 20.2) to patient pick-up, then to Salem Reception Center, then to Rockingham TSA.
Hampton Falls	A	Rockingham TSA to LSA then 1 bus to run 3 bus routes then to Dover Reception Center, then to Rockingham TSA.
	A	Rockingham TSA to LSA then 1 bus to Lincoln Ackerman School, then to Dover Reception Center, then to Rockingham TSA.
Hampton	A	Rockingham TSA to LSA then 1 bus to run bus routes 1, 2, 3 and 4, then to Dover Reception Center, then to Rockingham TSA.
	A	Rockingham TSA to LSA then 1 bus to run bus routes 5, 6 and 7, then to Dover Reception Center, then to Rockingham TSA.
	A	Rockingham TSA to LSA then 1 bus to Winnacunnet High School, then to Dover Reception Center, then to Rockingham TSA.
	A	OMNE TSA to LSA then 1 bus to Aslan's Pride Day Care then to Dover Reception Center then to OMNE TSA.
South Hampton	A	Rockingham TSA to LSA, then 1 bus to run 2 bus routes then to Salem Reception Center then to Rockingham TSA.
	A	OMNE TSA to LSA then 1 bus to Barnard School then to Salem Reception Center then to OMNE TSA.
Kensington	A	Rockingham TSA to LSA, then 1 bus to run 2 bus routes then to Manchester Reception Center then to Rockingham TSA.
	A	OMNE TSA to LSA then 1 bus to Kensington Elementary School then to Manchester Reception Center then to OMNE TSA.

* Revised June 1, 1988
** Revised June 14, 1988

TOWN	WAVE	ASSIGNMENTS	
DAY 1 (continued)			
North Hampton	A	Rockingnam TSA to LSA, then 1 bus to run 3 bus routes then to Dover Reception Center then to Rockingnam TSA.	*
	A	OMNE TSA to LSA then 1 bus to Busy Beaver Day Care then to Dover Reception Center then to OMNE TSA.	**
Newton	A	Rockingnam TSA to LSA, then 1 bus to run 2 bus routes to Salem Reception Center then to Rockingnam TSA.	
	B	Rockingnam TSA to LSA, then 1 bus to Newton Memorial School, then to Rockingnam TSA.	**
E. Kingston	A	OMNE TSA to LSA then 1 bus to Peek-A-Boo Day Care then to Manchester Reception Center then to OMNE TSA.	**
Kingston	A	Rockingnam TSA to LSA, then 1 bus to run 5 bus routes then to Salem Reception Center then to Rockingnam TSA.	
Brentwood	A	Rockingham TSA to LSA, then 1 bus to run 2 bus routes then to Manchester Reception Center then to Rockingnam TSA.	
	B	Rockingnam TSA to LSA, then 1 bus to Swasey Central School then to Manchester Reception Center then to Rockingnam TSA.	
Exeter	A	Rockingnam TSA to LSA, then 1 bus to Eventide Nursing Home then to McKearly Health Care Center (Derry) then to Rockingnam TSA. (Evac Bed Demo)	
	B	Rockingnam TSA to LSA, then 1 bus to Phillip's Exeter Academy then to Manchester Reception Center then to Rockingnam TSA.	
Portsmouth	A	OMNE TSA to LSA, then 1 bus to Edgewood Center then to Edgewood Center then to Riverside Nursing Home (Dover) then to OMNE TSA.	# **
New Castle	B	OMNE TSA to LSA, then 1 bus to New Castle Elementary School then to Dover Reception Center then to OMNE TSA.	
Rye	B	OMNE TSA to LSA, then 1 bus to Briar Patch Day Care then to Dover Reception Center then to OMNE TSA.	
Greenland	B	OMNE TSA to LSA then 1 bus to Wink and A Dream Day Care then to Dover Reception Center then to OMNE TSA.	
Stratham	B	OMNE TSA to LSA, then 1 bus to Stratham Village Academy then to Manchester Reception Center then to OMNE TSA.	
Newfields	B	OMNE TSA to LSA then, 1 bus to Newfields Preschool then to Manchester Reception Center then to OMNE TSA.	

* Revised June 1, 1988/** Revised June 14, 1988
# Errata, Rev. 1, July 1988.

DAY 2

Portsmouth — Rockingham TSA to LSA,
then 1 car to:

Portsmouth Junior High School
Brackett Elementary
Sherburne Elementary
Dondero Elementary
Little Harbor School
New Franklin Elementary School
Wentworth Elementary School
Lady Isle School
Jones School
Bethel Academy
St. Patrick's School
Portsmouth High School
Agape Day Care, then return to Rockingham TSA

then 1 car to:

Alpha Academy
Marge Durgin-Barry
Country Nursery
Community Day Care
Children Garden
Seacoast Day Care
C & G Day Care
Edgewood Manor
Portsmouth Headstart D.C.
Debra Holmes D.C.
Peggy Roy D.C.
Patricia Kapkin D.C.
Sharon Littlefield D.C., then return to Rockingham TSA

then 1 car to:

Montessori Learning D.C.
Project After D.C.
Gayle Minizzi D.C.
Joan Coffey D.C.
Barbara Shannon D.C.
Kathy Tostenson D.C.
Augusta Trice D.C.
Penny Santa-Barbara D.C.
Woodlawn D.C.
Kids Zone D.C.
Lois Ramsey D.C.
Chase Home for Children
Brenda's Day Care, then return to Rockingham TSA

TOWN	ASSIGNMENTS

DAY 2 (continued)

Portsmouth (continued)	1 car to Bus Routes 1, 2, 3 and 4, then return to Rockingham TSA 1 car to Bus Routes 5, 6 and 7, then return to Rockingham TSA
New Castle	Rockingham TSA to LSA then 1 car to run 1 bus route then return to Rockingham TSA
Rye	Rockingham TSA to LSA then 1 car to run 5 bus routes then return to Rockingham TSA Rockingham TSA to LSA then 1 car to: Rye Elementary Rye Junior High School Learning Skills Academy Cheryl Blais D.C. Safe and Sound D.C. Sunshine Buttercup D.C. Kid Castle D.C. then return to Rockingham TSA
Stratham	Rockingham TSA to LSA then 1 car to run 4 bus routes then return to Rockingham TSA, then 1 car to: Stratham Memorial School Corner Stone School Acorn School Giving Tree D.C. Martha Pidgeon D.C. Richie McFarland D.C. Country Kids D.C. Kid Stop D.C., then return to Rockingham TSA
Greenland/ Newfields	Rockingham TSA to Greenland LSA then 1 car to run 3 bus routes then return to Rockingham TSA Rockingham TSA to Greenland LSA then 1 car to: Greenland Central School (Greenland) Cheryl Graham D.C. (Greenland) then to Newfields LSA then to Newfields Elementary (Newfields) Kinder-Warren Child Care (Newfields) then return to Rockingham TSA Rockingham TSA to Newfields LSA then 1 car to run 2 bus routes then return to Rockingham TSA.

* Revised June 1, 1988

TOWN	ASSIGNMENTS

DAY 2 (continued)

Seabrook/ Hampton Falls	Rockingham TSA to Seabrook LSA then 1 car to:
	Gingerbread Day Care (Seabrook) then to Hampton Falls LSA then to:
	Hampton Falls Kindergarten and Nursery (Hampton Falls) Hampton Falls Child Care Center (Hampton Falls) Sonshine Kids (Hampton Falls) then return to Rockingham TSA
Hampton	Rockingham TSA to Hampton LSA then 1 car to:
	Central School Hampton Christian School Sacred Heart Academy Junior High School Marston School Lucille Pollard D.C. Taylor School D.C. My First School D.C. Seacoast Health Center then return to Rockingham TSA
North Hampton/ E. Kingston/ Newton	Rockingham TSA to North Hampton LSA then 1 car to:
	North Hampton Elementary (North Hampton) North Hampton Nursery (North Hampton) Montessori School (North Hampton) then to E. Kingston LSA then to:
	East Kingston Elementary (E. Kingston) Browns Academy (E. Kingston) Grace Bible School (E. Kingston) then to Newton LSA then to:
	Sanborn Middle School (Newton) Teddy Bear Nursery (Newton) Happy Hour Kindergarten (Newton) Wee Friends D.C. (Newton) then to Rockingham TSA
Kingston/ Brentwood	Rockingham TSA to Kingston LSA then 1 car to:
	Sanborn High School (Kingston) Daniel J. Bakie School (Kingston) South Road Kindergarten (Kingston) Kingston Childrens' Center (Kingston) Kingston Childrens' Center Annex (Kingston) Faith Hume D.C. (Kingston) then to Brentwood LSA then to: Country Kids D.C. (Brentwood) then return to Rockingham TSA

* Revised June 1, 1988

TOWN	ASSIGNMENTS

DAY 2 (continued)

Exeter	Rockingham TSA to Exeter LSA then 1 car to: Exeter High School Exeter Junior High School Lincoln Street School Main Street School Montessori School A.B. Hearty/Friends D.C. Virginia Franzoni D.C. Little School D.C. then return to Rockingham TSA then 1 car to: Joyce Dubes D.C. Edna Klemarczyk D.C. Windy Hill Preschool Exeter Child Care Exeter Day Care Exeter Headstart Building Block D.C. then return to Rockingham TSA
Rye/ Portsmouth	Rockingham TSA to Rye LSA then 1 car to Webster-at-Rye then to Dover House Health Care (Dover) then to Portsmouth Local TSA then to Wentworth Home (Portsmouth) then to Frisbie Memorial Hospital (Rochester) then return to Rockingham TSA.
Portsmouth	Rockingham TSA to Portsmouth LSA then 1 car to Portsmouth Hospital then to York Hospital (York, ME), then to Wentworth Douglass Hospital (Dover, NH) then to New Hampshire Hospital (Concord, NH) then to Parkland Medical Center (Derry, NH) then return to Rockingham TSA.
Portsmouth/ Exeter	Rockingham TSA to Portsmouth LSA then 1 car to Parrot Avenue Nursing Home (Portsmouth) then to Clipper Home (Portsmouth) then to Clipper Home (Rochester, NH) then to Exeter LSA then 1 car to Langdon Place of Exeter (Exeter) then to Langdon Place of Dover (Dover, NH) then return to Rockingham TSA.
Exeter	Rockingham TSA to Exeter LSA then 1 car to Exeter Hospital (Exeter) then to Concord Hospital (Concord, NH) then to Catholic Medical Center (Manchester) then to Hampstead Hospital (Hampstead NH) then return to Rockingham TSA.

* Revised June 1, 1988
**Revised June 14, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 8

Section Number: 3.3.8

Title: NH Ambulance Contacts

State Involved: New Hampshire

Resources To Be Evaluated: Ambulances for evacuation transportation.

Total Resources Required/Involved: One ambulance, one ambulance crew (one driver and one emergency medical technician).

Sub-category: State EOC, Concord; State Transportation Staging Area, Rockingham County Complex, Brentwood.

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: No additional required

Comments: FEMA has agreed to the use of a contracted resource for the purpose of demonstrating the functional capability of ambulance services during the graded exercise. For the purposes of the graded exercise, the demonstration is limited to the mobilization and processing of ambulance resources. Demonstration of the ambulance crew's medical services capabilities is not required.

Summary: One ambulance with a driver and EMT will be contracted for the purpose of demonstrating the mobilization, processing and deployment of ambulance evacuation transportation resources during the exercise.

Section Number: 3.3.8

Constraints To Reasonably Achievable:

1. Due to the constraint that public health and safety may be impacted, the ambulance will be contracted to demonstrate staging and processing activities.

2. Transport of individuals will be simulated.

Methodology Description/Sequence of Events:

NOTE: THE ACTUAL TRANSPORT OF AN EVACUEE IS ROUTINE FUNCTION OF AMBULANCE SERVICES AND IT NOT CONTEMPLATED FOR THE DEMONSTRATION OF AMBULANCE RESOURCE CAPABILITY. NEITHER IS THE ACTUAL DEPLOYMENT OF THE CONTRACTED AMBULANCE BEYOND THE STATE TSA.

1. When directed to mobilize ambulance resources at the State Transportation Staging Area, the EOC Resources Coordinator will be directed by a controller to have the contracted company send the available unit and crew to the State TSA.

2. When instructed by the TSA Supervisor to deploy ambulance resources as directed by the State IFO Resources Coordinator, the TSA Ambulance Coordinator will be given controller-provided instructions to initiate the process for the deployment and dispatch of the available unit to a designated hospital or nursing home facility.

3. Upon completion of the deployment process, i.e., the issuance of dosimetry, provision of directions, etc., the FEMA Evaluator will complete his assessment of the required interfaces and procedures.

NOTE: THIS EVALUATION MAY BE CONDUCTED OUT OF SEQUENCE OF THE SCENARIO TIME LINE AT THE DISCRETION OF THE FEMA EVALUATOR AND THE CONTROLLER TO PERMIT THE AMBULANCE UNIT AND CREW TO RETURN TO NORMAL SERVICE IN A TIMELY MANNER.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 20

Section Number: 3.3.9

Title: Traffic and Access Control Points

State Involved: New Hampshire

Resources To Be Evaluated: State Police; Local Police; State DOT; Local Public Works Department

Total Resources Required/Involved: FEMA Evaluators at State EOC and IFO. Local EOC's. State Police Troop A. NHY Controllers

Sub-category: NH EOC; IFO; Troop A; NHDOT; Local Police; Local Public Works; ACP's; TCP's

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of facility evaluators, plus 1 additional.

Comments: N/A

Summary:

1. Two Traffic (D-NH-02 and D-HA-01) and two Access (EP-1 and NW-3) Control Points will be staffed by State Police and equipped by State DOT.

2. One Traffic Control Point will be staffed and equipped in each EPZ community with traffic control responsibility subject to availability of personnel resources needed for public safety. The following traffic control points have been selected for local communities: Brentwood, F-BR-02; E. Kingston, F-EK-01; Exeter, F-EX-01; Greenland, G-GR-01; Kingston, F-KI-02; New Castle, G-NC-01; Newfields, F-NF-01; Newton, F-NT-02; Portsmouth, G-PO-01; Seabrook, A-SE-04; and Stratham, G-ST-01. North Hampton is not

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Summary: (continued)

assigned TCP staffing responsibility in the New Hampshire Traffic Management Manual, therefore no TCP will be demonstrated by North Hampton.

3. Command and Control decisions on TCP/ACP points required by the scenario and the staffing of these points will be evaluated by FEMA evaluators located at the State EOC; the State IFO; NH SP Troop A; and Local EOC's.

4. One FEMA Evaluator and one NHY Controller dispatched from Troop A Headquarters will evaluate all field activities for State-staffed and equipped TCF's and ACP's.

5. Field activities for Local TCP's will be evaluated by FEMA Evaluator(s) assigned to the participating Local EOC's.

6. Identification of points to be staffed during the exercise, have been defined with the constraints defined herein. *

7. Staffing for all TCP/ACPs will be demonstrated by a roster. *

8. No shift turnover to be demonstrated at TCPs/ACPs.

Constraints To Reasonably Achievable:

1. FEMA to provide 2 evaluators for State-staffed points (1 for Command and Control of Troop A; one to be dispatched from Troop A to State-staffed points).

2. FEMA to provide evaluators to observe local TCP's in participating EPZ community.

3. Actual emergencies or police details take precedence over drill activities.

4. A maximum of one local official, in each participating EPZ community having local traffic control responsibilities, and 4 State Police will be available on day of the exercise. Actual staffing of local traffic control

Constraints To Reasonably Achievable: (continued)

points during the exercise will be staffed as local personnel resources permit during a non-emergency demonstration.

5. Selection of TCP's in local participating towns may be limited on the basis of the number of points assigned by the New Hampshire Traffic Management Manual for staffing by local police.

6. Only one Traffic Control person will be dispatched to each of the selected points. At points which require more than one Traffic Guide, the remaining positions will be simulated.

Methodology Description/Sequence Of Events:

1. Traffic and Access Control Points to be demonstrated will be limited to two (2) Traffic Control Points (TCP) and two (2) Access Control Points (ACP) for the State and a maximum of one (1) Traffic Control Point in each participating EPZ Community.

2. The physical location of the ACP/TCPs have been preselected.

3. No set-up of equipment is to occur in any lane of traffic.

4. Controllers will distribute the location of points to be demonstrated to cognizant participants on the day of the exercise.

5. For State Controlled Points:

a) State Police will be dispatched from Troop A Barracks in Epping, NH.

b) DOT personnel will be dispatched from DOT garages.

c) FEMA Evaluators and Controllers will leave from Troop A to evaluate the four selected State points.

d) State Police and DOT will wait at each designated point to be evaluated. After FEMA Evaluators finish, players will be dismissed.

Methodology Description/Sequence of Events: (continued)

e) One State Police point will stay manned in order to provide traffic impediment support.

6. For Locally Controlled Points:

a) Local police and public works personnel will be dispatched from the local police station and public works garages as applicable.

b) FEMA Evaluator and Controller will leave from Local EOC to evaluate selected points at a mutually agreeable time.

c) Local personnel will wait at each designated point to be evaluated. After FEMA Evaluators are finished players will be dismissed.

EVALUATION WORKSHEET FOR EXTENT OF PLAY

Objective 33

Section Number: 3.3.10

Title: Traffic Impediment Evaluation

State Involved: New Hampshire

Resources To Be Evaluated: Coordination with towing companies

Total Resources Required/Involved: Contracted Towing Companies

Sub-category: IFO, Troop A, Local EOCs

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: None.

Summary: The process of demonstrating appropriate traffic control and the removal of traffic impediments will be evaluated by the use of mini-scenarios. Identification of mini-scenarios will be selected by FEMA prior to the Exercise. The mini-scenario shall be controlled by NHY Controllers. Road crew actions are to be integrated with this evaluation.

Constraints To Reasonably Achievable:

1. Due to the Need to minimize time away from normal duty stations as a result of public safety concerns, only four (4) NH State Troopers will respond for field demonstrations during the course of the exercise.
2. Social and economic impacts regarding use of public and private resources.
3. Tow trucks will be limited to the pre-exercise contracted arrangements.

Methodology Description/Sequence Of Events:

1. Two impediments will be staged by mini-scenarios. One mini-scenario is to include a traffic re-route. Mini-scenario NH 6-7 will be a re-route. Mini-scenario NH 6-2 will be a non-re-route.

Methodology Description/Sequence of Events: (continued)

2. Mini-scenarios NH-6-2 and NH-6-7 identify the location, approximate time of event, duration of event, and type of impediment.

3. Enough time to ensure the proper integration of the impediment is to be given to the NHY Controlling organization.

4. Times of impediments are such that one (1) FEMA Evaluator can evaluate both of the impediments.

5. The NHY Controlling organization will ensure all appropriate actions are taken to ensure that all parties (players, observers, evaluators, and controllers) know the identity of the impediment.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 14

Section Number: 3.11

Title: NH Media Center Inquiries Per Hour

State Involved: New Hampshire

Resources To Be Evaluated: Media Relations Assistant. Media Relations/Rumor Control Liaison. Media Relations/Rumor Control Supervisor. Communications. i.e., Joint Telephone Information Center (JTIC) Located at Newington Station

Total Resources Required/Involved: Media Relations Staff. JTIC. Media Center. FEMA Evaluators. NHY Controller Organization

Sub-category: Location of Media Relations Assistants and Supervisor: JTIC: Location of Media Relations/Rumor Control Liaison: Media Center: Some public information staff at State EOC

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of facility evaluators

Comments: N/A

Summary: The process of demonstrating the ability to manage Media Center Inquiries will be evaluated by FEMA at the JTIC. The New Hampshire Media Relations Personnel will be exercised through controllers operating from the NHY Control Cell. The Media Relations operators will operate from the JTIC and calls from controllers in the NHY Control Cell representing media will exercise this function. NHY Control Cell Logs will be collected at the end of each day and copies given to FEMA.

Section Number: 3.3.11

Constraints To Reasonably Achievable:

1. Number of FEMA Evaluators

2. No public inquiries are to be made since NRC regulations (10 CFR Part 50, App. E.) call for an exercise without mandatory public participation.

Methodology Description/Sequence of Events: This functional area is to be conducted Day 1 and Day 2 only. Prescripted messages are available for NHY Control Cell use after the initiation of the first news release. A Controller with the NHY Emergency News Manager will inform the Lead Controller of the NHY Control Cell of the publication of the news release. The Lead Controller will control the flow of the messages to the JPIC based upon the nature of the event and the content of the prescripted messages. The Lead Controller will adjust the flow of the prescripted messages as the time line and drill sequence of events dictate. Approximately 5 prescripted messages per Media Relations Assistant per hour will be input during the scenario. This pace will continue for approximately three (3) hours after the General Emergency declaration on Day 1. This rate will not be demonstrated on Day 2 although a flow of messages will continue. At the time jump to Day 5, this function will be deactivated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 15

Section Number: 3.3.12

Title: NH Rumor Control Inquiries Per Hour

State Involved: New Hampshire

Resources To Be Evaluated: Rumor Control Staff, Media Relations/Rumor Control Supervisor, MR/RC Liaison, Communications (i.e., Joint Telephone Information Center (JTIC)) Located at Newington Station

Total Resources Required/Involved: FEMA Evaluators, NHY Controller Organization, Rumor Control Staff, JTIC, Media Center

Sub-category: Some public information staff at State EOC

Location of MR/RC Supervisor: JTIC

Location of MR/RC Liaison: Media Center

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of facility evaluators.

Comments: N/A

Proposed Solution

Summary: The process of demonstrating the ability to manage Rumor Control will be evaluated by FEMA at the JTIC. The general public will not be involved in making calls to the Rumor Control Staff, therefore, all calls will be made by Controllers from the NHY Control Cell. These messages are based upon the particular plant ECL and general assumptions on the extent of response. NHY Control Cell Logs will be collected at the end of each day.

Constraints To Reasonably Achievable:

1) The general public will not be involved since NRC regulations (10 CFR, Part 50, App. E) call for an exercise without mandatory public participation.

2) Number of FEMA Evaluators

Section Number: 3.3.12 Objective 15

Methodology Description/Sequence Of Events: This function is to be conducted on Day 1 and Day 2 only. Prescripted messages are available for NRC Control Cell use after the initiating event (Alert message). The flow of the messages may commence upon activation of the JITIC and will be closely monitored and administered to reflect as closely as possible real general public inquiries and concerns. The pace of messages will increase at each ECL upgrade until at a General Emergency, approximately 5 rumor inquiries are being made per hour per rumor control staff member. This pace will continue for approximately three (3) hours after the General Emergency declaration on Day 1. The Lead Controller must closely monitor the Rumor Control/Media Relations calls to ensure the flow of messages is consistent with the timeline and sequence of events. The rate of inquiries will not be demonstrated on Day 2 although the flow of message will continue. At the time jump to Day 5, this function will be deactivated.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 13

Section Number: 3.3.13

Title: Emergency Management EBS Station Demonstration: WOKO

State Involved: New Hampshire

Resources To Be Evaluated: Dedicated ringdown telephone circuit, telefax machines, EBS messages, Public Information Personnel, radio station operations

Total Resources Required/Involved: One ringdown circuit, two telefax machines, one hard-copy EBS message, one communications officer, one radio station controllers, FEMA Evaluators

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: N/A

Proposed Solution

Summary: The process of notifying the public via the EBS network will be actually demonstrated; however, no "emergency" message will be heard by the public. Instead, the public will hear the radio station's weekly EBS network test message. A master tape (or tapes) will be made depicting the stations chronology of the exercise. A tape recorder will be provided by FEMA. *

Constraints To Reasonably Achievable:

1. There shall be no impact to the general public.

2. Impact to radio station normal operation shall be limited to the extent possible.

* Revised June 1, 1988

Section Number: 3.3.13

Methodology Description/Sequence Of Events:

1. The Communications Officer contacts and telefaxes an EBS message to the radio station (WOKO) or relays which pre-recorded message should be broadcast.

2. The announcer will make a voice recording of the telefaxed messages received. This tape may be made out of sequence to accomodate the broadcaster's schedule.

3. At a designated time the announcer will perform the weekly test of the EBS network, using the two-tone signal and the weekly test message. (This may be out of sequence of the time designated by EOC representatives, in order to fit in normal broadcasting schedule.) This weekly test will be conducted once.

4. Subsequent to the actual demonstration, further EBS activation will participation will be conducted in the same manner as indicated in paragraphs 1 and 2 above.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.3.14

Title: IFO SPECIAL ASSISTANCE LINES

State Involved: NEW HAMPSHIRE

Resources To Be Evaluated: IFO Personnel manning IFO Special Assistance Lines and Participating Local EOCs *

Total Resources Required/Involved: Personnel at IFO, Local EOCs, FEMA Evaluators, NHY Controlling organization *

Sub-category: IFO and Local EOCs *

EXTENT OF PLAY

FEMA Proposed Number Of Evaluators For This Resource: 13

Comments: N/A

Summary: The general public will not be involved in making calls to the Special Assistance Lines at the IFO and Local EOCs, therefore, all calls will be made by Controllers from the NHY Control Cell. A matrix of the Control Cell Message numbers to Local EOC or Local EOC or IFO position is attached. *

* Revised June 1, 1988

Constraints To Rea. bly Achievable:

1. No participation by members of the general public.

Methodology Description/Sequence Of Events:

1. Prescripted messages are available for the NHY Control Cell use after the initiating event (Alert message). The flow of the messages will be closely monitored and administered to reflect as closely as possible real general public inquiries and concerns.
2. The rate for demonstration purposes will be as follows:
   a) To IFO: 2 calls per hour per position at a Site Area Emergency
   b) To IFO: increasing to 3 calls per hour per position at a General Emergency
   c) To Local EOCs: 2 calls per hour at a Site Area Emergency
   d) To Local EOCs: 3 calls per hour at a General Emergency
3. Rates, as identified in Step 2 above, should be maintained 3 hours past declaration of the General Emergency.
4. Calls requesting transportation for special needs population shall be limited to special needs identified in the current special needs population survey.

The Control Cell Special Population messages exceed the extent of play requirements due to potential participation of present non-participating communities. Messages for non-participating towns (asterisk) have been inserted in the event of these towns wishing to participate. The Control Cell will manage compliance to the FEMA negotiated extent of play requirements, by only simulating calls to the Help Line numbers that will meet the requirements.

	1130-1230	1231-1330	1331-1430	1431-1530	1531-1630
Brentwood	18, 37	64, 79	100, 107, 109	148, 151, 154	202, 212, 222
E. Kingston	20, 40	52, 60	95, 96, 98	166, 169, 172	223, 230, 249
Exeter	28, 36	75, 78	89, 90, 91	147, 181, 185	218, 236, 244
Greenland	38, 41	45, 65	132, 133, 134	143, 183, 198	213, 227, 237
Hampton*	14, 17	51, 55	85, 121, 123	153, 168, 178	248, 255, 258
Hampton Falls*	8, 12	57, 58	83, 135, 136	149, 152, 160	239, 251, 260
Kensington*	23, 42	66, 69	84, 105, 140	158, 171, 174	238, 243, 252
Kingston	31, 35	50, 62	97, 99, 101	156, 159, 165	205, 210, 245
New Castle	34, 39	56, 59	92, 93, 94	173, 176, 180	224, 229, 250
Newfields	26, 30	77, 81	131, 141,. 129	161, 199, 177	211, 221, 232
Newton	29, 33	49, 53	86, 87, 88	186, 169, 191	216, 228, 246
N. Hampton	24, 13	70, 76	117, 124, 125	144, 179, 196	206, 215, 217
Portsmouth	21, 25	68, 74	111, 112, 113	146, 192, 194	203, 209, 219
Rye*	2, 7	43, 63	104, 122, 137	164, 182	234, 242, 247
Seabrook	6, 27	67, 71	114, 115, 116	145, 162, 195,	204, 214, 226
S. Hampton*	11, 15	47, 61	119, 136, 139	167, 175, 184,	207, 241
Stratham	5, 16	73, 80	126, 127, 128	142, 155, 197	208, 220, 225
1419	8, 10	47, 55, 66, 69	83, 123, 137 139	152, 167, 171, 184 187	241, 242, 248, 260
1437	7, 9, 12, 15, 23	43, 51, 57, 61, 82	86, 120, 136, 138, 140	158, 168, 175, 178	207, 238, 243, 255, 258
1434	3, 5, 7, 11, 42	46, 58, 63	84, 104, 105, 110, 127	149, 160, 170, 174, 177, 182	234, 239, 247, 251, 252

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 18

Section Number: 3.3.15

Title: EPZ and Host Hospitals

State Involved: New Hampshire

Resources To Be Evaluated: EPZ Hospitals, Local (EPZ) EOC's, DPHS

Total Resources Required/Involved: FEMA Evaluators, NHY Controllers, EPZ Hospitals, Local (EPZ) EOC's, DPHS.

Sub-category: None

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: No additional evaluators required.

Comments: N/A

Summary: Participating hospitals will simulate internal emergency response activities so as to minimize disruption of routine health care services during the exercise. Demonstration of the notification of EPZ hospitals and the required exchange of information will be demonstrated at the Local EOC's in Exeter and Portsmouth. Notification per procedure and information exchange with participating host hospitals will be demonstrated. It is not anticipated that exercise activity will involve host hospitals.

Constraints To Reasonably Achievable:

1. The number of FEMA Evaluators available.

2. The number of NHY Controllers available.

3. Potential disruption of health care services delivery in a non-emergency situation.

4. The actual movement of hospital patients during a non-emergency situation shall not be permitted.

Methodology Description/Sequence Of Events:

1. Each of the impacted hospitals notifies its designated host facilities if they agree to participate.

2. It is not anticipated that ambulances will be dispatched to a hospital facility due to potential for interference with normal hospital activities. (See Transportation Resource and Ambulance Contact evaluation sheets.)

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 11

Section Number: 3.3.16

Title: Management of Contaminated and Injured Patients

State Involved: New Hampshire

Resources To Be Evaluated: Ambulance and MS-1 Hospitals

Total Resources Required/Involved: 2 Ambulances, 4 EMTs, 4 Controllers, 1 FEMA Evaluator, 2 Victims, 2 MS-1 Hospitals

Sub-category: Disposition of Contaminated Ambulance

EXTENT OF PLAY

Proposed Number of FEMA Evaluators for this Resource: 1

NOTE: Include Cross Reference, As Applicable: FEMA GM MS-1

Comments: N/A

Summary: This will be an out of sequence activity on a pre-selected day as determined by hospital schedule, with the accident victim being potentially contaminated and injured. A message will be given to an ambulance (or simulated ambulance by personal vehicles) that will be pre-staged at the State Transportation Staging Area. The ambulance will proceed to a pre-selected location where the accident scene will be simulated. The victim will be stabilized with the EMTs knowledgeable of the potential contamination problem. After emergency care, the victim will be transported to a MS-1 hospital where the victim will be treated and decontaminated if necessary.

Constraints To Reasonably Achievable:

1. Ambulance availability is subject to last minute change due to real emergencies. Therefore, simulation of ambulances by personal vehicles may be used.
2. Number of FEMA Evaluators.
3. Scheduling of hospitals and extent of participation may be hampered by staffing and real emergencies.

Methodology Description/Sequence of Events:

1. The medical scenario will be the same at each of the MS-1 hospitals.
2. Ambulances will be prestaged at the State Transportation Staging Area.
3. Transport by car may simulate ambulance transport.
4. The MS-1 and MS-1 backup hospital evaluation will be on different days and out of sequence with the exercise scenario.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 22

Section Number: 3.3.17

Title: NH Congregate Care

State Involved: New Hampshire

Resources To Be Evaluated: ARC Procedures at State EOC, Host EOCs, Reception Centers

Total Resources Required/Involved: FEMA Observers, NHY Controllers at State EOC, Host EOC, Reception Center

Sub-category: Facilities mentioned above.

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: No additional evaluators required.

Comments: N/A

Summary: As procedures regarding the designation and staffing of shelters in NH Host Communities requires notification and coordination at several levels, FEMA Evaluators and NHY Controllers at the several locations will observe and evaluate the response activities.

Red Cross will make and implement decisions concerning number of shelters and staff needed to manage the shelters as well as the assigning of evacuees to various shelters.

Summary: continued)

Activation and operation of congregate care centers by the American Red Cross will be limited to one (1) center in the city of Manchester. *

Constraints To Reasonably Achievable:

1. Number of FEMA Evaluators
2. Number of NHY Controllers available
3. Social and economical impact concerns regarding the use of public and private facilities.
4. American Red Cross participation
5. Congregate Care Facility availability.
6. Activation and operation of Congregate Care Centers may be demonstrated out of sequence due to ARC volunteers availability and that of the facilities used as shelters (i.e., schools).

Methodology Description/Sequence Of Events:

1. FEMA Observers at State EOC, Host EOC and Reception Center observe communication and decision making processes between ARC representatives and other agency representatives among ARC representatives at various locations.
2. Observe notification process to shelter facilities.
3. The ARC will open one Congregate Care Center in Manchester to demonstrate Congregate Care Facility operation. An interview with Shelter Manager may be conducted. *
4. This demonstration will be out of sequence with the exercise scenario.
5. No shift change to occur.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 12

Section Number: 3.3.18

Title: NH Alert and Notification System

State Involved: State of New Hampshire

Resources To Be Evaluated: NH Alert and Notification System

Total Resources Required/Involved: Coordination of decision to activate the ANS

Sub-category: State of New Hampshire EOC and IFO, and the Rockingham County Complex

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of evaluators assigned to these facilities.

Comments: N/A

Summary: The process of demonstrating the ability to provide prompt notification of the public will be evaluated by observing the PAR decision making process coupled with the coordination of simulating the activation of the ANS and EBS. Coordination will be conducted with the ORO and the FEMA Control Cell. Controllers will observe and assess coordination activities in these facilities. Rockingham County personnel will be evaluated by FEMA Evaluators to determine extent of knowledge of siren activation procedural compliance.

Full demonstration of ANS will be associated with FEMA REP-10 test.

Constraints To Reasonably Achievable:

The number of FEMA and NHY Controllers/Evaluators

Methodology Description/Sequence Of Events:

1. Controllers and FEMA Evaluators assigned to the IFO, NH EOC and Rockingham County Sheriffs Department will be assigned the responsibility of observing the coordination of ANS activation between the respective facilities and with the activation of the EBS system.

2. Coordination between the State of New Hampshire, the ORO and the FEMA Control Cell should be conducted prior to activation of ANS and EBS.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 21 & 34

Section Number: 3.3.19

Title: NH RERP Host Community Reception Centers and Decontamination Facility Vehicle Monitoring

State Involved: New Hampshire

Resources To Be Evaluated: Host Community Reception Centers and Decontamination Facilities Exterior Operations-Vehicle Monitoring

Total Resources Required/Involved: 2 Host Community Reception Centers. 2 Host Community Decontamination Facilities. *

Sub-category: N/A

EXTENT OF PLAY

Proposed Number of FEMA Evaluators For This Response:

Comments: None

Summary: Host Community Reception and Decontamination Centers are activated concurrently with protective action decision-making for the EPZ. Activation and limited operation of two Reception/Decontamination Centers at * Dover and Salem will demonstrate the Host Community Reception and Decontamination Centers functions. Additionally, staffing will be sufficient to process 40 people simulating evacuees to demonstrate the ability to monitor 20 persons * per hour per registration area monitor. Six (6) monitors (4 Registration Area and 2 Control Point) per facility to be demonstrated. This rate to be conducted for a period of 30 minutes. One (1) out of 5 evacuees will be simulated to be contaminated. A minimum of one (1) evacuee at each center will have a * low-level source hidden in his clothing. For vehicles 2 vehicle monitoring

Summary: (continued)

positions will be staffed to demonstrate the ability to monitor vehicles at the rate of 60 vehicles per hour for a period of 20 minutes. The use of New England Compact Assistance will be simulated to provide a demonstration of 24 hour coverage of DPHS Supervisor positions. *

Constraints To Reasonably Achievable:

1) The number of FEMA evaluators available.

2) The number of Controllers required to oversee Reception and Decontamination Centers Exterior Operations-Vehicle Monitoring.

3) Cooperation of local elected officials.

4) Availability of local emergency response personnel due to a real emergency situation during the exercise.

5) Correlation of the participating Host Community Reception and Decontamination Centers with the scenario-driven EPZ protective actions.

6) Requirements to provide ongoing public safety services is a non-real emergency situation.

Methodology Description/Sequence of Events:

1) FEMA will provide evaluators to observe Reception and Decontamination Centers operations in two participating Host Communities.

2) Observation of Reception and Decontamination Center-related activities will be conducted at the Host Communities. These activities may be run out of sync with scenario timeline (activation will occur after 3:30 p.m.) to accommodate the time windows when the schools used as reception centers are available. *

Methodology Description/Sequence of Events: (continued)

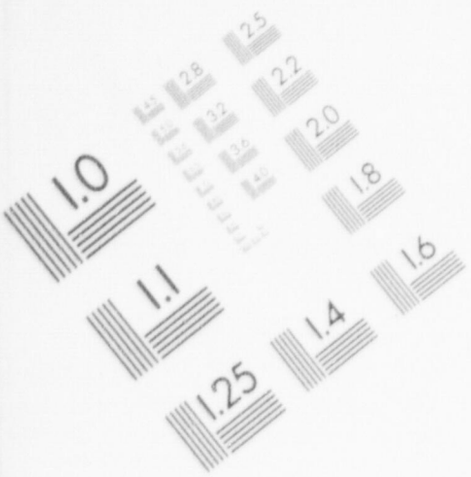
3) Activities within both participating Reception and Decontamination Centers will be controller-driven.

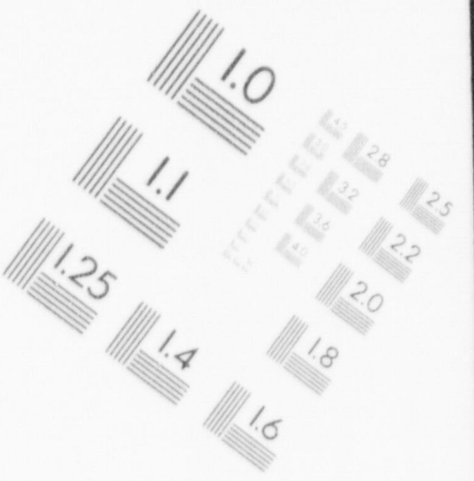
4) Actual staffing in each facility will be sufficient to provide demonstration of response activities associated with that facility to process 40 people simulating evacuees. New England compact personnel will be simulated to allow a turnover demonstration with DPHS supervisors (3 per center). Remainder of staffing will be demonstrated by a roster. *

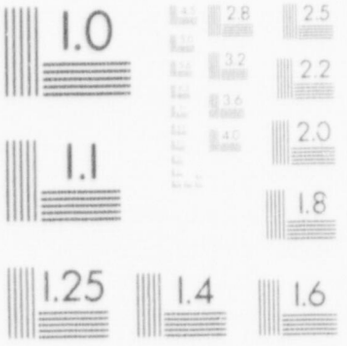
5) The number of personnel and vehicles monitored at these locations will be sufficient to demonstrate the monitoring process. This process will demonstrate a rate of 60 vehicles per hour and 20 persons per hour for each vehicle and registration area monitoring position staffed. *

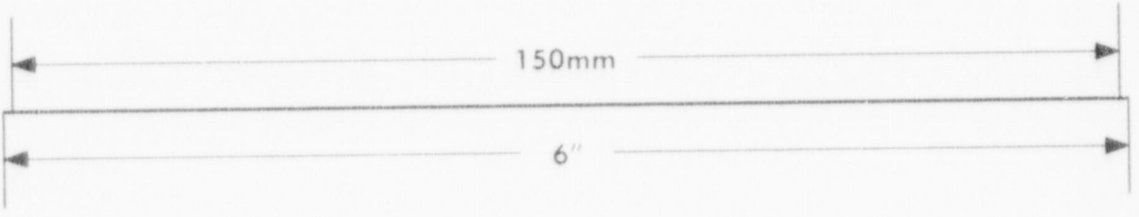
1

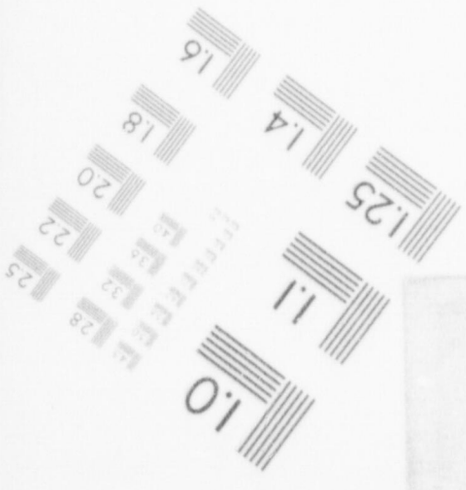
IMAGE EVALUATION TEST TARGET (MT-3)

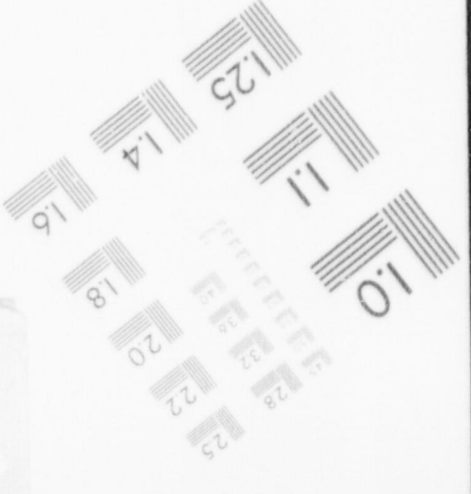












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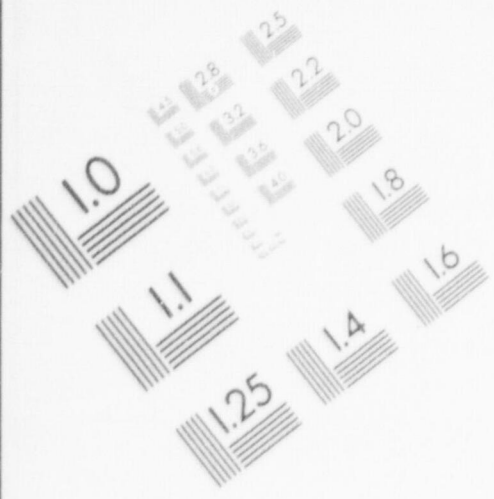

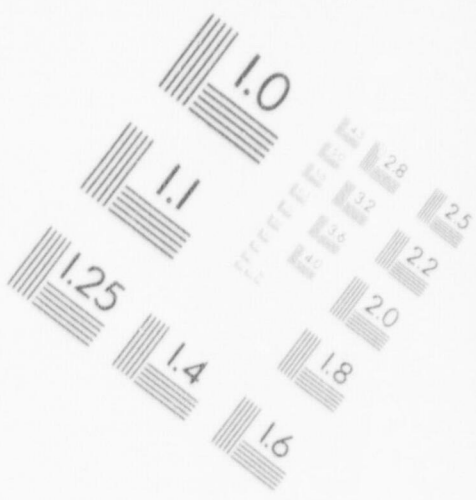

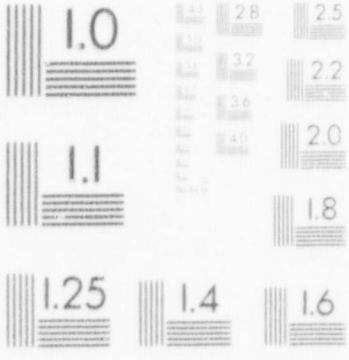

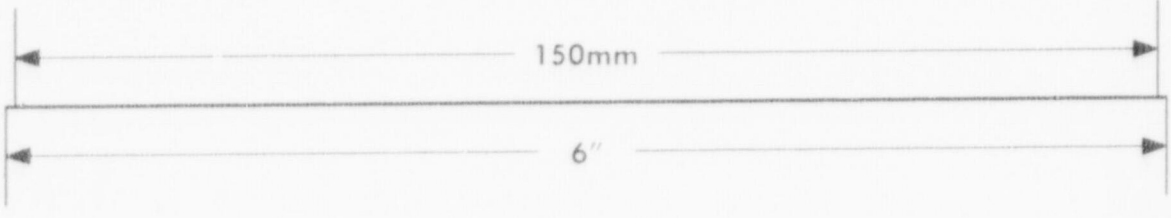

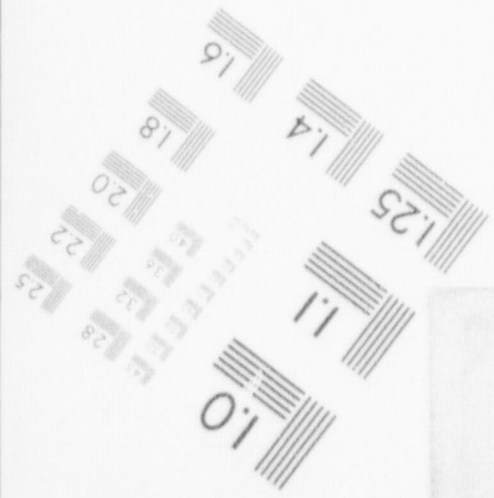

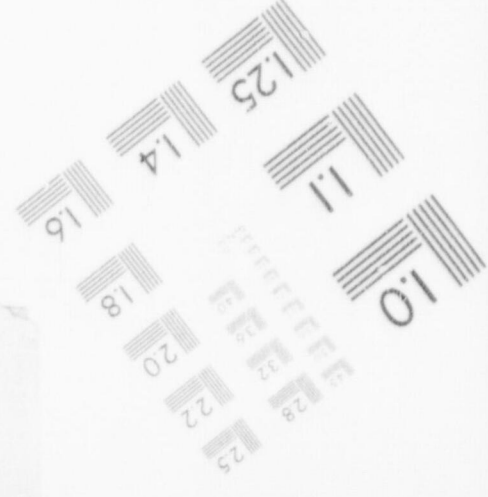

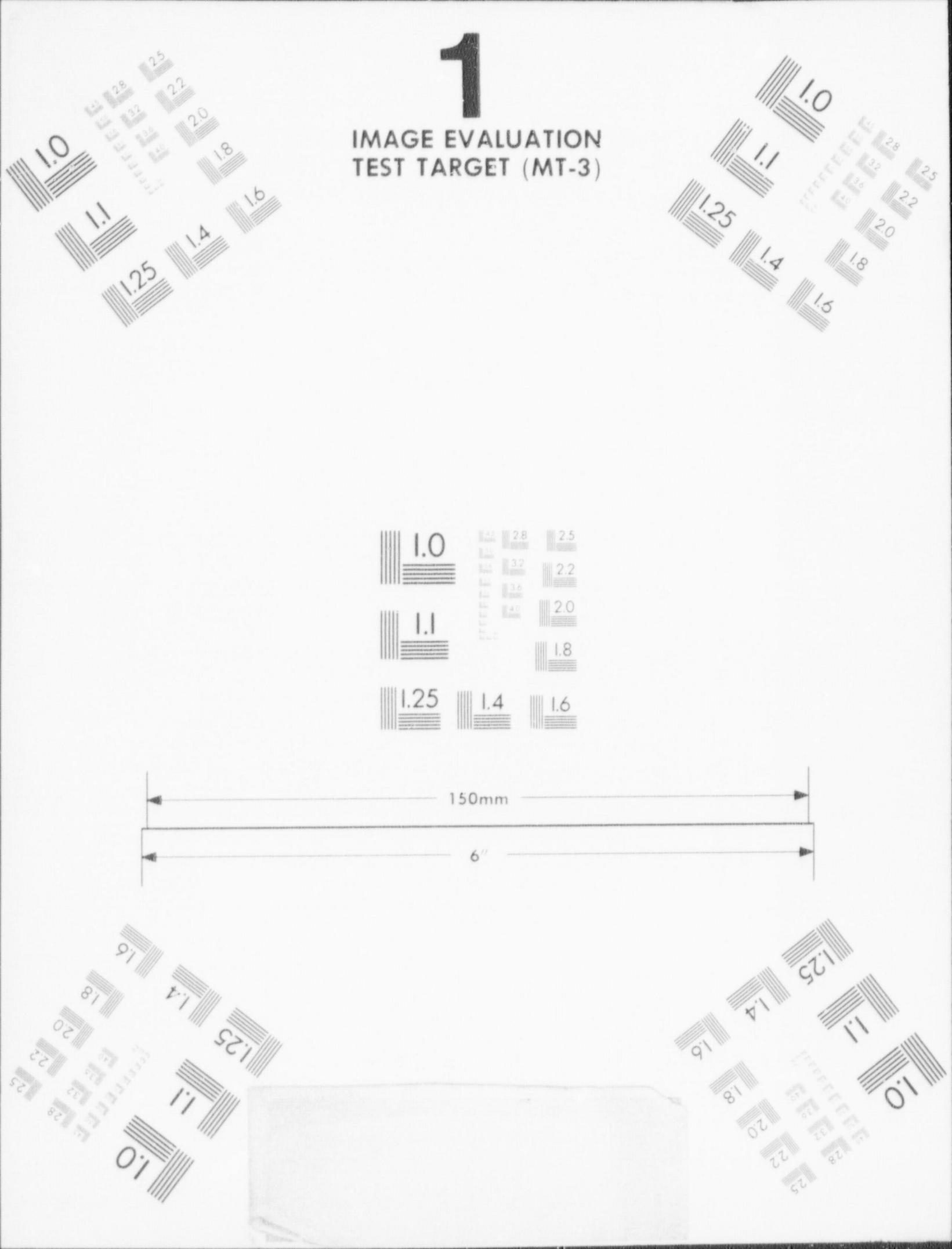
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TEST TARGET (MT-3)
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1.1
1.25
1.4
1.6
1.8
2.0
2.2
2.5
2.8
3.2
3.6
4.0
150mm
6"

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 27

Section Number: 3.3.20

Title: New Hampshire IEPI Sample Collection Teams

State Involved: New Hampshire

Resources To Be Evaluated: State EOC, NH DPHS

Total Resources Required/Involved: Sample Teams, NH DPHS

Sub-category:

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource:

Comments:

Summary: Once the NH DPHS Sample Team Coordinator has defined the Day 2 sample collection team locations, he will receive a message from the NH DPHS IFO Controller, superceding sample plan requirements and directing him to send two (2) teams to the pre-designated sample collection locations. These teams will obtain the required samples per sampling requirements (out of sequence from the rest of the exercise). Samples will be packaged and logged. Data from the NHY Controllers in the State facilities EOC and IFO will be provided, as though the teams had adhered to the scenario-dictated sample plan.

Constraints To Reasonably Achievable:

1) Identified sample locations in unavailable areas

2) Special circumstances arise negating the use of identified sample farms

Methodology Description/Sequence Of Events: Sampling techniques will be demonstrated as follows:

1) The NH DPHS Sample Team Controller will define the Day 2 Sample Collection Team locations per scenario. Once this is accomplished the NH DPHS EFD Controller will present a message that supersedes these planned locations and directs him to assign teams to the following areas for actual out of sequence sample collection.

2) Two (2) teams will be directed to the following pre-designated participating farms to collect required samples i.e., milk, vegetation, seasonal crops (asparagus, strawberries and raspberries) water, soil.

NOTE: Only the milk sample may actually be available for collection at these locations. If this happens, then those remaining samples will be collected at the nearest acceptable location (possible U-Pick Farm).

3) Team 1 will be directed to go to the Hurd Dairy Farm on Timber Swamp Road in Hampton Falls, NH.

4) Team 2 will be directed to the Veilleux Dairy Farm on Drinkwater Road in Hampton Falls, NH.

5) These two teams are playing out of sequence to the scenario timeline.

6) Where teams are directed to locations to perform environmental sampling in areas that this is not achievable, alternate locations will be picked to complete this demonstration.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 28 *

Section Number: 3.2.21

Title: NH Laboratory Operations

State Involved: State of New Hampshire

Resources To Be Evaluated: NH DPHS Laboratory

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, NH DPHS Lab in Concord, NH

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 1

Comments: N/A

Summary: This evaluation will be performed out of sequence from the scenario timeline. The evaluation will commence when samples are delivered to the laboratories. Evaluation to include screening, packaging, labeling, logging, and appropriate contamination controls up to the point of determining sample geometry. Discussion of procedures will follow. Actual counting will not take place. Controllers will provide sample results. Evaluation to include sample results processing.

* Revised June 1, 1988

Constraints To Reasonably Achievable:

1) Availability of sample media.

2) Number of FEMA Evaluators

Methodology Description/Sequence Of Events:

1) Evaluation to be conducted out of sequence from the scenario timeline.

2) Evaluation commences upon arrival of samples (provided by NHY Controlling Organization). Samples will include one (1) of each medium (water, milk, soil, grass, strawberries, asparagus and raspberries).

3) Samples to be screened, packaged, labelled and appropriately locked.

4) Evaluators/Controllers may question the laboratory staff on processing of samples.

5) Sample preparation and analysis instrumentation are set up for counting (appropriate geometry). Actual counting will not take place.

6) The NHY Controlling Organization will provide results upon completion of simulated counting and counting process evaluation.

7) Result processing will be part of the evaluation.

* Revised June 1, 1988

SECTION 3.4.0

SUMMARY OF THE STATE OF MAINE

RADIOLOGICAL EMERGENCY RESPONSE ACTIVITIES

The worksheets included in this section provide a summary of the specific process to be demonstrated for each radiological emergency response functional area identified.

Table 4.0-1 provides an index of the functional areas included in this section. As a result of the limited involvement by the State of Maine in response actions due to the fact that Maine is not within the Seabrook Station Plume Exposure EPZ, only a few of the functional areas are provided for purposes of this proposal.

MAINE

FUNCTIONAL AREA INDEX

SECTION	FUNCTIONAL AREA
3.4.1	Access/Traffic Control
3.4.2	Media Center Briefing
3.4.3	Rumor Control Inquiries Per Hour
3.4.4	Emergency Management Public Information Demonstration
3.4.5	Laboratory Operations *

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 33

Section Number: 3.4.1

Title: Access/Traffic Control

State Involved: Maine

Resources To Be Evaluated: Traffic Control Points, Access Control Points

Total Resources Required/Involved: 1 FEMA Evaluator, 1 NHY Controller

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: 1

Comments: None.

Summary: FEMA Evaluator and NHY Controller to be dispatched from Troop A Barracks, Scarborough, ME.

Constraints To Reasonably Achievable:

1. Maine State Police will only staff one TCP/ACP due to potential impact on public safety.

Methodology Description/Sequence Of Events:

1. Scenario selects TCP/ACP to be staffed by State Police, Local Police and County Sheriff's personnel (ACPs KI-4 and KI-5).
2. Point may be staffed out of sequence of scenario main timeline.
3. Dosimetry provided to Maine DOT and Maine State Police along with appropriate forms, in accordance with the Maine Traffic Management Manual.
4. Maine DOT vehicle is dispatched to TCP/ACP with appropriate signs, barricades and cones.

* Revised June 1, 1988

Constraints To Reasonably Achievable: (continued)

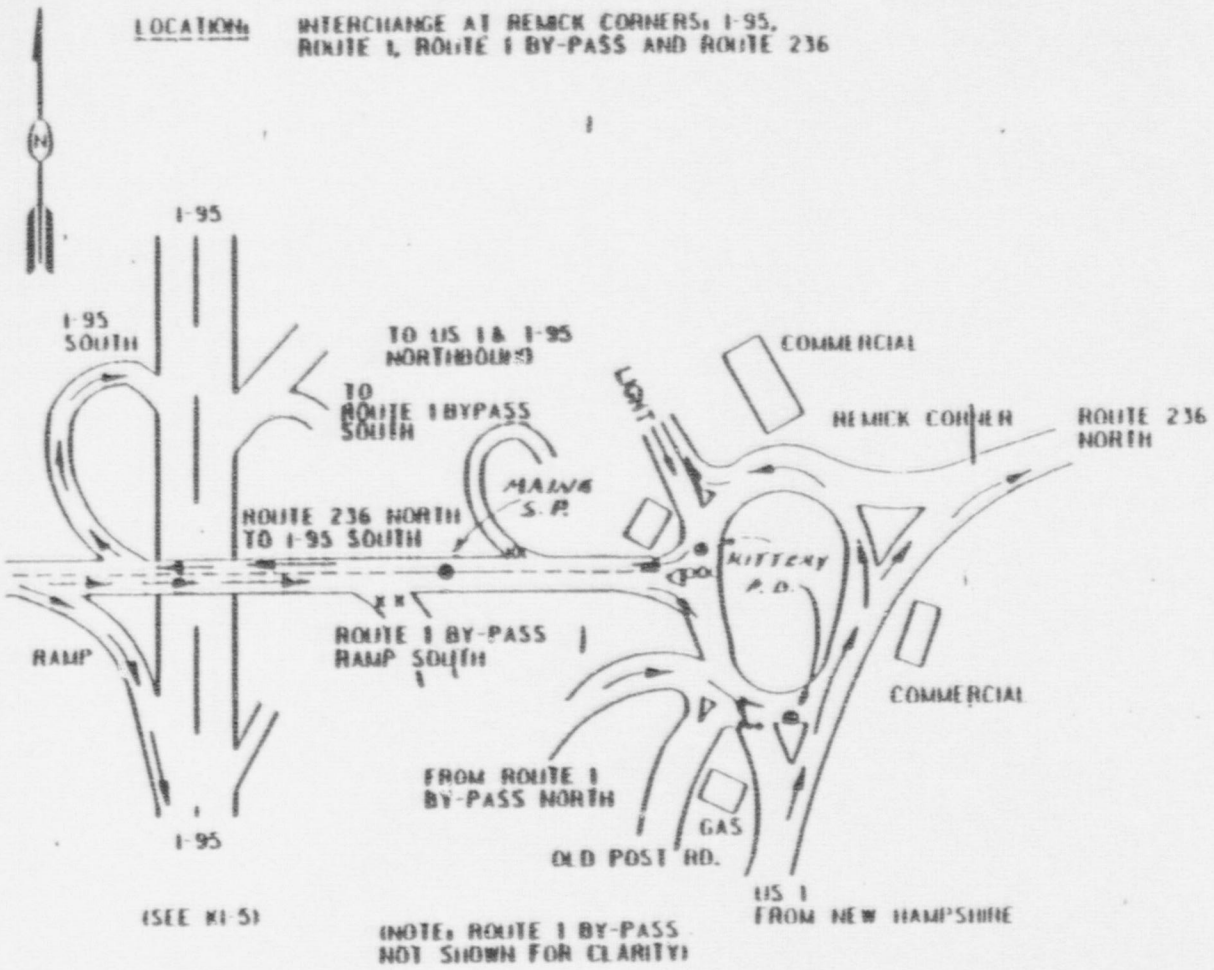
5. State Police officer, (York County Sheriff's and/or local Police Officer may also be dispatched) accompanied by FEMA Evaluator and NHY Controller, dispatched to TCP/ACP.

6. Maine DOT and Maine State Police personnel demonstrate knowledge of cosimetry, traffic strategy.

7. No equipment is to be set up in any lane of traffic or public road that may cause potential traffic concerns or other impact to public.

TOWN: KITTERY

LOCATION: INTERCHANGE AT NEWICK CORNERS: I-95, ROUTE 1, ROUTE 1 BY-PASS AND ROUTE 236



(SEE KI-5)

(NOTE: ROUTE 1 BY-PASS NOT SHOWN FOR CLARITY)

KEY:

- MOVEMENT FACILITATED
- MOVEMENT DISCOURAGED
- ● TRAFFIC GUIDE
- O TRAFFIC CONE
- X TRAFFIC BARRICADE

DESCRIPTION:

1. FACILITATE TRAFFIC MOVEMENT INTO AND AROUND THE TRAFFIC CIRCLE TOWARD NORTHBOUND ROUTES 1, I-95 AND 236.
2. RESTRICT TRAFFIC MOVEMENTS TO SOUTHBOUND ROUTES 1 AND 1 BY-PASS AND I 95.

MANPOWER/EQUIPMENT

- 3 TRAFFIC GUIDES
- 6 TRAFFIC CONES
- 4 TRAFFIC BARRICADES

NO.	DATE	BY	CHKD	APP'D	DESCRIPTION

MAINE OFFICE OF EMERGENCY MANAGEMENT

KITTERY

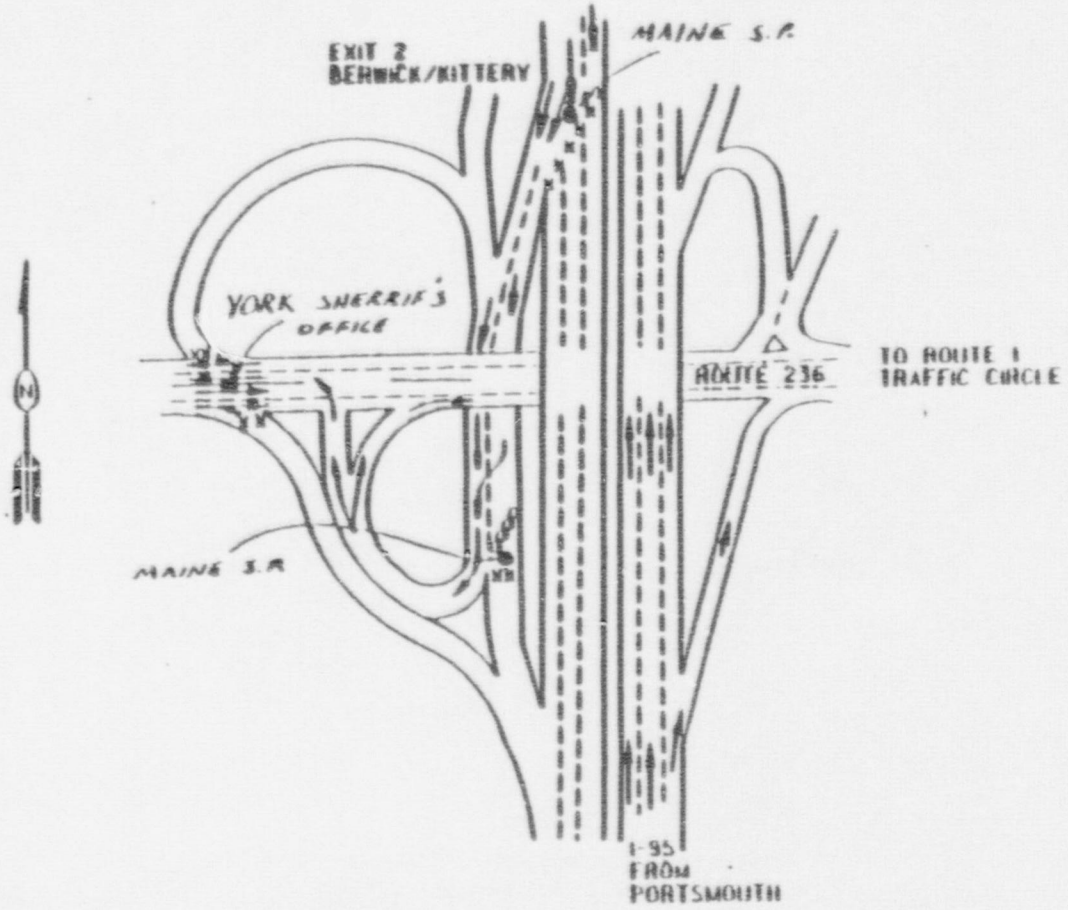
ACCESS CONTROL POST

KI 4

MOE -033005

TOWN: KITTERY

LOCATION: INTERCHANGE OF I-95 WITH ROUTE 236



KEY:

- MOVEMENT FACILITATED
- MOVEMENT DISCOURAGED
- ● TRAFFIC GUIDE
- O TRAFFIC CONE
- X TRAFFIC BARRICADE

DESCRIPTION:

1. FACILITATE TRAFFIC MOVEMENT ON I-95 MERGING ONTO EXIT RAMP TO I-95 SERVICE ROAD THEN ONTO EXIT RAMP TO ROUTE 236.
2. DISCOURAGE TRAFFIC MOVEMENTS TO SOUTHBOUND I-95.

MANPOWER/EQUIPMENT

3 TRAFFIC GUIDES
4 TRAFFIC CONES
12 TRAFFIC BARRICADES

REV	DATE	MBM	CHKD	APP'D	DESCRIPTION
A	7/1/85	---	dd	jck	

MAINE OFFICE OF EMERGENCY MANAGEMENT

KITTERY
ACCESS CONTROL POST
KI 5

MOE -033006

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 14

Section Number: 3.4.2

Title: Media Center Briefing

State Involved: Maine

Resources To Be Evaluated: Media Center (Augusta, ME)

Total Resources Required/Involved: FEMA Evaluators, NHY Controllers, Imitation or real reporter(s), telephone capability between EOC and EOF/IFO and between Maine Media Center in Augusta, Maine.

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of evaluators to be assigned to facilities

Comments: N/A

Summary: Briefings of the press are provided in the Maine Media Center in Augusta, ME. Information, from EOF/IFO and condensed into news releases at the State EOC, will be provided to the Media Center by the State EOC as co-located in the State Office Building. Media Center personnel prepare material to be presented to the media representatives; Governor's Press Secretary or his representative gives press briefing.

Constraints To Reasonably Achievable:

1. Number of NHY Controllers and FEMA Evaluators

Section Number: 3.4.2

Methodology Description/Sequence Of Events:

1. Information developed at the EOF/IFD and the Maine State ECC is coordinated with State of NH and NHY ORO and provided by phone to Maine Media Center.

2. Maine Media Center personnel prepare material to be presented to the media.

3. Governor's Press Secretary or his representative presents information to the media via news conferences in the Media Center on the first and second day.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 21

Section Number: 3.4.3

Title: Rumor Control Inquiries Per Hour

State Involved: Maine

Resources To Be Evaluated: Rumor Control Center (Augusta, ME), Communications

Total Resources Required/Involved: 1 FEMA Evaluator, 1 NHY Controller, Phone Cell

Sub-category: Rumor Control Center, Control Cell

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number of FEMA evaluators assigned to facility

Comments: Number of incoming calls per hour (5) established at April 20, 1988 meeting.

Summary: The process of demonstrating the ability to manage Rumor Control will be evaluated by FEMA at the Augusta Rumor Control Center. The general public will not be involved in making calls to the Rumor Control Staff; therefore, all calls will be made by Controllers from the NHY Control Cell using prescripted messages. These messages are based upon the particular plant ECL and general assumptions on the extent of response. The administration of the messages will be closely monitored by the NHY Control Cell Lead Controller to ensure continuity.

Section Number: 3.4.3

Constraints To Reasonably Achievable: None

Methodology Description/Sequence Of Events:

1. Questions/messages are telephoned into the Rumor Control Center.

2. Response is made by Rumor Control Center personnel.

3. Demonstration of calls handled by the Maine Media Center will be conducted on day 1 and day 2. The rate of calls for day 2 will be received at a slower rate than day 1. At the time jump to day 5, this action may be deactivated.

* Revised June 1, 1988

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 13 and 14

Section Number: 3.4.4

Title: Emergency Management Public Information Demonstration

State Involved: Maine

Resources To Be Evaluated: Communications, news releases, Augusta Media Center, Newington Media Center, Rumor Control Telephone Number and Public Information Personnel at these facilities

Total Resources Required/Involved: Telephones, news releases, two media centers, Public Information Personnel, FEMA Evaluators, Controllers

Sub-category: N/A

EXTENT OF PLAY

Proposed Number Of FEMA Evaluators For This Resource: Included in number assigned to facilities

Comments: None

Summary: Public information will be provided both to the general public and to farmers, food processors and distributors by the Maine Emergency Management Agency. Both electronic and print media and the Cooperative Extension Service and State Agriculture Department will facilitate timely dissemination of ingestion pathway protective action recommedations. General information on the emergency will also be distributed. This does not include EBS activation in Maine. This will be demonstrated during Days one and two.

Constraints To Reasonably Achievable: None

Methodology Description/Sequence of Events: The methodology to demonstrate the notification of the public in the Maine portion of the 50-mile ingestion pathway is as follows:

After receiving notification of a Site Area Emergency, the Maine Emergency Management Agency will activate its EOC, Media Center, and send a Public Information Coordinator to the Newington Media Center. Informational messages and ingestion pathway protective actions will be disseminated through those channels, which includes electronic and print media. Scripts of emergency instructions for the ingestion pathway will be available as news releases for immediate dissemination through the two media centers.

EVALUATION WORKSHEET FOR EXTENT OF PLAY Objective 28

Section Number: 3.4.5

Title: Maine Laboratory Operations

State Involved: State of Maine

Resources To Be Evaluated: Environmental Laboratory

Total Resources Required/Involved: FEMA Evaluators, NHY Controlling Organization, Public Health Laboratory

Sub-category: N/A

EXTENT OF PLAY

FEMA Proposed Number Of Evaluations For This Resource: 1

Comments: N/A

Summary: This evaluation will be performed out of sequence from the scenario timeline. The evaluation will commence when samples are delivered to the laboratories. Evaluation to include screening, packaging, labeling, logging, and appropriate contamination controls up to the point of determining sample geometry. Discussion of procedures will follow. Actual counting will not take place. Controllers will provide sample results. Evaluation to include sample results processing.

* Revised June 1, 1988

Constraints To Reasonably Achievable:

1) Availability of sample media.

2) Number of FEMA Evaluators

Methodology Description/Sequence Of Events:

1) Evaluation to be conducted out of sequence from the scenario timeline.

2) Evaluation commences upon arrival of samples (provided by NHY Controlling Organization). Samples will include one (1) of each medium (water, milk, soil, grass, strawberries, asparagus and raspberries).

3) Samples to be screened, packaged, labelled and appropriately logged.

4) Evaluators/Controllers may question the laboratory staff on processing of samples.

5) Sample preparation and analysis instrumentation are set up for counting (appropriate geometry). Actual counting will not take place.

6) The NHY Controlling Organization will provide results upon completion of simulated counting and counting process evaluation.

7) Result processing will be part of the evaluation.

* Revised June 1, 1988

NEW HAMPSHIRE YANKEE

SEABROOK STATION

1988 FEMA/NRC GRADED EXERCISE

3.0 EXTENT OF PLAY

SEABROOK POST-EXERCISE ASSESSMENT

REPORT CLARIFICATION SHEET

The following constitute clarifications to the FEMA Post-Exercise Assessment (PEA) of the June 28 - 29, 1988, Exercise for the Seabrook Nuclear Power Station, dated September 1, 1988.

Pages 173 - 177 See attached, marked up pages with marginal notes about duplicate entries.

Page 181 Add the following routes:

Route # 127	Greenland LSA to Wink and a Dream Day Care Center to Dover Reception Center	Completed
Route # 128	North Hampton LSA to Busy Beaver Day Care Center to Dover Reception Center	Completed

Page 181 The first full paragraph should be modified as follows:

In summary, transportation needs were identified. Transportation resources were notified, mobilized and deployed to provide transportation assistance to schools, day care centers, and nurseries. Of the 118 routes scheduled for demonstrated, 5 were cancelled, leaving a total of 113 demonstrations; 2 routes were completed with controller interventions; 2 were completed with local population assistance; 108 were successfully completed and 1 was not competed. In general, the maps were not accurate. No landmarks were indicated on the maps. Not all day care centers were on the maps.

ATTACHMENT B

NEW HAMPSHIRE YANKEE

SEABROOK STATION

1988 FEMA/NRC GRADED EXERCISE

3.0 EXTENT OF PLAY

SEABROOK POST-EXERCISE ASSESSMENT

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ATTACHMENT B

recommend early dismissal due to concern for the latch key children. A precautionary PA was made at Site Area Emergency to hold children in school until 1700; i.e., late dismissal. The Board of Education notified all appropriate school districts of this precautionary PA.

Portsmouth officials recommended early dismissal with the instruction to hold latch-key children at the schools until their parents could pick them up. Brentwood officials directed the Swasey school to allow normal dismissal of school children.

When evacuation was ordered for the general population at 1420 in various towns, the school children were included as part of the public to be evacuated.

In the towns not evacuating, the late dismissal decision was extended from 1700 to 1900, or until parents picked up their children. EPZ schools and potential host schools were promptly notified of changes in the situation by phone from Department of Education.

The IFO Local Liaisons coordinated transportation resources to assist the evacuation of schools. For participating towns, the transportation requirements for the schools were obtained from the Local Liaison Officers in each of the towns. For the non-participating towns, the transportation resource requirements for the schools were obtained by the Local Liaison Officers in the IFO by direct contacts with the schools themselves. Transportation requirements were summarized and transmitted to the State (Transportation Coordinator). Follow-up was done by obtaining information from the State Staging Areas indicating when vehicles were dispatched and when vehicles arrived at destinations, and when they departed. No significant delays or problems were observed in obtaining and dispatching resources.

The buses left the Staging Areas in an orderly and timely manner. Drivers and vehicles were dispatched from the Staging Area to local Staging Areas and then to assigned schools, day care centers and nurseries.

Following is a summary of the routes and FEMA's evaluation:

School: Day Care Routes

Number	Route	Comment
1	PCBC TSA to E. Kingston LSA to Peek-a-boo to Manchester RC	Completed
2	~~Portsmouth LSA to Community Day Care~~	Completed

Duplicate. See #26.

Portsmouth LSA to Briar Patch Day Care Center (located at Little Harbor School)	3	~~Portsmouth LSA to Little Harbor School~~	Completed
	4	Portsmouth LSA to Little Harbor School	Completed
	5	Portsmouth LSA to Joan Coffey Day Care	Completed
	6	Portsmouth LSA to Barbara Shannon Day Care	Completed
	7	Portsmouth LSA to Kathy Tostenson Day Care	Completed
	8	Portsmouth LSA to Augusta Trice Day Care	Completed
	9	Portsmouth LSA to Woodlawn Day Care	Completed
	10	Portsmouth LSA to Brenda's Day Care	Completed
	11	Portsmouth LSA to Kids Zone Day Care	Completed
	12	Portsmouth LSA to Lois Ramsey Day Care	Completed
	13	Portsmouth LSA to Chase Home for Children	Completed
Duplicate. See #10.	14	~~Portsmouth LSA to Brenda's Day Care~~	Completed
	15	Hampton LSA to My First School Day Care	Completed
	16	Hampton LSA to Lucille Pollard Day Care	Completed
Duplicate. See #35.	17	~~Exeter LSA to Joyce Dubos Day Care~~	Completed
Duplicate. See #36.	18	~~Exeter LSA to Edna Klemarczyk Day Care~~	Completed

Duplicate. See #37.	19	~~Exeter LSA to Windy Hill Preschool~~	Completed
Duplicate. See #39.	20	~~Exeter LSA to Exeter Day Care~~	Completed
Duplicate. See #40.	21	~~Exeter LSA to Exeter Headstart Day Care~~	Completed
Duplicate. See #41.	22	~~Exeter LSA to Building Block Day Care~~	Completed
Duplicate. See #82.	23	~~Portsmouth LSA to Alpha Academy~~	Completed
	24	Portsmouth LSA to Marge Durgin-Barry	Completed
	25	Portsmouth LSA to Country Nursery	Completed
	26	Portsmouth LSA to Community Day Care	Completed
	27	Portsmouth LSA to Children Garden	Completed
	28	Portsmouth LSA to Seacoast Day Care	Completed
	29	Portsmouth LSA to C&G Day Care	Completed
	30	Portsmouth LSA to Portsmouth Headstart Day Care	Completed
	31	Kingston LSA to Kingston Children's Center	Completed
	32	Kingston LSA to Faith Hume Day Care	Completed
	33	Exeter LSA to A.B. Hearty Friends Day Care	Completed
	34	Rockingham LSA to Virginia Franzoni Day Care	Completed
	35	Exeter LSA to Joyce Dubes Day Care	Completed

36	Exeter LSA to Edna Klemarczyk Day Care	Completed
37	Exeter LSA to Windy Hill Preschool	Completed
38	Exeter LSA to Exeter Child Care	Completed
39	Exeter LSA to Exeter Day Care	Completed
40	Exeter LSA to Exeter Headstart Day Care	Completed
41	Exeter LSA to Building Block Day Care	Completed
42	Newton LSA to Teddy Bear Nursery	Completed
43	Newton LSA to Wee Friends Day Care	Completed with Controller intervention
44	Greenland LSA to Greenland Central School	Completed
45	Newfields LSA to Newfields Elementary	Completed
46	Hampton LSA to Central School	Completed
47	Hampton LSA to Hampton Christian School	Completed
48	Hampton LSA to Sacred Heart	Completed
49	Hampton LSA to Academy Junior High	Completed
50	Hampton LSA to Marston School	Completed
51	North Hampton LSA to North Hampton Elementary	Completed
52	North Hampton LSA to Montessori School	Completed
53	E. Kingston LSA to E. Kingston Elementary	Completed

	54	E. Kingston to Browns Academy	Completed
	55	E. Kingston LSA to Grace Bible School	Completed
Duplicate. See #122.	56	~~Newton LSA to Sanborn Middle School~~	Completed
	57	Kingston LSA to Sanborn High School	Completed
	58	Kingston LSA to Daniel J. Bakie School	Completed
	59	Seabrook LSA to Seabrook Elementary	Completed
	60	Hampton Falls LSA to Lincoln Ackerman School	Completed
	61	Hampton LSA to Winnacunnet High School	Completed
	62	South Hampton LSA to Barnard School	Completed
	63	Kensington LSA to Kensington Elementary School	Completed
	64	Newton LSA to Newton Memorial School	Not Completed
	65	Brentwood LSA to Swasey Central School	Completed
	66	Exeter LSA to Phillip's Exeter Academy	Completed
	67	New Castle to New Castle Elementary	Completed
	68	Stratham LSA to Stratham Village Academy	Completed
	69	Newfields LSA to Newfields Preschool	Completed with Controller intervention

70	Portsmouth LSA to Portsmouth Junior High School	Completed
71	Portsmouth LSA to Brackett Elementary	Completed
72	Portsmouth LSA to Sherbourne Elementary	Not Completed Vehicle problem
73	Portsmouth LSA to Dondero Elementary	Not Completed Vehicle problem
74	Portsmouth LSA to Little Harbor School	Not Completed Vehicle problem
75	Portsmouth LSA to New Franklin Elementary School	Not Completed Vehicle problem
76	Portsmouth LSA to Wentworth Elementary	Not Completed Vehicle problem
77	Portsmouth LSA to Lady Isle School	Completed
78	Portsmouth LSA to Jones School	Completed
79	Portsmouth LSA to Bethel Academy	Completed
80	Portsmouth LSA to St. Patricks School	Completed
81	Portsmouth LSA to Portsmouth High School	Completed
82	Portsmouth LSA to Alpha Academy	Completed
83	Rye LSA to Rye Elementary	Completed
84	Rye LSA to Rye Jr. High School	Completed
85	Stratham LSA to Stratham Memorial School	Completed
86	Newton LSA to Happy Hour Kindergarten	Completed

87	Kingston LSA to South Road Kindergarten	Completed
88	Exeter LSA to Exeter High School	Completed
89	Exeter LSA to Exeter Jr. High School	Completed
90	Exeter LSA to Lincoln Street School	Completed
91	Exeter LSA to Main Street School	Completed
92	Exeter LSA to Montessori School	Completed
93	Portsmouth LSA to Agape Day Care	Completed
94	Portsmouth LSA to Edgewood Manor	Completed
95	Portsmouth LSA to Deborah Holmes	Completed
96	Portsmouth LSA to Peggy Roy	Completed
97	Portsmouth LSA to Patricia Kapkin	Completed
98	Portsmouth LSA to Sharon Littlefield	Completed
99	Portsmouth LSA to Montessori Learning Center	Completed
100	Portsmouth LSA to Gail Minizzi	Completed
101	Portsmouth LSA to Penny Santa-Barbara	Completed
102	Rye LSA to Learning Skills Academy	Completed
103	Rye LSA to Cheryl Blais Day Care	Completed

104	Rye LSA to (Stepping Stones) Safe and Sound Day Care	Completed
105	Rye LSA to Sunshine Buttercups	Completed
106	Rye LSA to Kid Castle	Completed
107	Stratham LSA to Cornerstone Day Care	Completed
108	Stratham LSA to Acorn School	Completed
109	Stratham LSA to Giving Tree Day Care	Completed
110	Stratham LSA to Martha Pigeon Day Care	Completed
111	Stratham LSA to Richie McFalland Day Care	Completed
112	Stratham LSA to Kids Stop Day Care	Completed
113	Stratham LSA to Country Kids Day Care	Completed
114	Greenland LSA to Cheryl Graham Day Care	Completed
115	Newfields LSA to Kinder-Warren Day Care	Completed
116	Seabrook LSA to Gingerbread Day Care	Completed
117	Hampton Falls LSA to Hampton Falls Kindergarten and Nursery	Completed
118	Hampton Falls LSA to Hampton Falls Child Care Center	Completed
119	Hampton Falls LSA to Sunshine Kids Day Care	Completed
120	Hampton LSA to Taylor School	Completed

121	North Hampton LSA to North Hampton Nursery	Completed with Local Assistance
122	Newton LSA to Sanborn Middle School	Completed
123	Kingston LSA to Kingston Children's Center Annex (Spring Hill School)	Completed
124	Brentwood LSA to Country Kids Day Care	Completed
125	Exeter LSA to Little School	Completed
126	Hampton LSA to Aslan's Pride	Completed with Local Assistance

In summary, transportation needs were identified. Transportation resources were notified, mobilized, and deployed to provide transporation assistance to schools, day care centers, and nurseries. Of the ~~126~~ scheduled routes demonstrated, 5 were cancelled, leaving a total of 121 demonstrations; 4 routes were completed with controlled intervention or local population assistance; and 116 routes were successfully completed. In general, the maps were not accurate. No landmarks were indicated on the maps. Not all day care centers were marked on the maps.

Issue #1: Implementation of PAs for Schools. ARCA (REP-1, J.10.g)

Evaluation: In Brentwood, after the order to shelter was received, the selectman in charge called the Swasey School to tell them to let the children take their normal bus routes home. In Portsmouth, the town officials to the schools told to effect early dismissal and to hold in shelter only the latch key children.

Recommendation: Train Staff on Protective Action Implementation. Additional training should be provided to the appropriate staff to ensure that they understand the State's Plan and procedures for implementing protective actions for school children.

Issue #2: Inadequate/Inaccurate Maps. ARCA (REP-1, J.10.g).

Evaluation: In several cases, the maps had wrong instructions or had wrong addresses which created significant problems for the drivers. In all cases, the drivers were able to recover effectively from the bad instructions by inquiring of local population for directions (Controller intervention). All the maps should be carefully reviewed and amended

where errors are present. Instructions on maps should be in more detail, with a more extensive use of landmarks. Since streets are poorly marked in the area, landmarks would speed verification of routes. Distances between landmarks, destinations, and local Staging Areas should be included in instructions. All addresses of schools and day care centers should be verified with maps.

Recommendations: Review and revise maps.

Issue #3: Training of Drivers. ARCA (REP-1, J.10.g.)

Evaluation: Drivers had difficulty reading maps and driving at the same time. When drivers did not follow the route, most found their way back to the correct route by asking the public or turning around. In some cases the maps had street names and town limits marked but in reality these points were not designated and this made following the route difficult.

Recommendation: Train staff on following route instructions.

Objective #20: Demonstrate the organizational ability and resources necessary to control evacuation traffic flow and to control access to evacuated and sheltered areas.

Evaluation: Met.

Narrative Summary: The State of New Hampshire demonstrated the organizational ability and resources necessary to control evacuation traffic flow and control access to evacuated and sheltered areas.

The State Police liaison at the State EOC were responsible for ensuring that sufficient personnel were available to staff the Access Control Points (ACPs) and Traffic Control Points (TCPs) required to implement the appropriate PA. The State Police liaison took action to ensure adequate police officers were available to handle the TCP and ACPs. At 1037 the State Police liaison arranged for 25 officers to handle beach closing. At 1335 the State Police liaison arranged for 30 more troopers. At 1530 the State Police liaison reported that all Traffic Control Points required to implement NH PA #3 were staffed; i.e., NH PA #3 requiring a total of 89 troopers (to staff ACP/TCPs). At 1635 NH PA #4, the staff were reassigned to appropriate ACP/TCPs. NH PA #4 required a total of 83 troopers to staff ACP/TCPs. The reassignment was completed by 1730.

The State Police liaison at the IFO was responsible for directing/prioritizing the order of ACP/TCP activation and was responsible for coordinating actions between the states, NHY ORO, and local communities.

MR. FLYNN: At this point Mr. Donovan is available for cross-examination.

MR. TRAFICONTE: Although I was listening attentively, I am yet a little puzzled.

What is Attachment A, Mr. Donovan, to your testimony?

THE WITNESS: (Donovan) Attachment A is a document called Extent of Play.

MR. TRAFICONTE: Okay, that is a document that I -- did you make that available?

MR. FLYNN: That was served with the original prefiled testimony. As I have indicated, I have a limited number of additional copies here today.

MR. TRAFICONTE: Do you have one that I could have?

MR. FLYNN: Yes.

(Document proffered to counsel.)

JUDGE SMITH: Sorry. You don't get one now.

(Laughter)

MR. TRAFICONTE: Again, so the record is clear, is Attachment B the clarification sheets to your testimony?

THE WITNESS: (Donovan) Attachment B is titled "Post-Exercise Report Clarification Sheet". Yes.

JUDGE MCCOLLOM: My Attachment B, Mr. Traficonte, at the bottom has printed "Attachment B".

MR. TRAFICONTE: Mine does not.

JUDGE MCCOLLOM: Well, then you must have a false one.

(Pause.)

MR. TRAFICONTE: Oh, I see. I see. I see.

I have two. One does; one doesn't.

JUDGE SMITH: Does your Attachment B have several pages in typesetter type?

MR. TRAFICONTE: Yes, it does.

I would like to distribute my cross-examination plan for full disclosure.

Let me just make a preliminary comment about scheduling for the benefit of the Board and the witness as well as the parties.

First, I would have a request that's slightly of a personal note, and all the parties have been put on notice of it. I expect to be able to complete Mr. Donovan, at least in terms of my cross-examination, probably Tuesday of next week. That is my objective.

What I would like permission to do is to examine him today and all day tomorrow. And then because of a pre-existing doctor's appointment which I am really very loath to change, I have arranged with Mr. Backus, who had intended to do cross-examination of Mr. Donovan, I have arranged with Mr. Backus to interrupt my cross, have him come in on

Friday, cross-examine Mr. Donovan on Friday morning, and then I would resume again on Monday.

JUDGE SMITH: Does anybody object to that procedure?

The Board has some concern about it, however. But I wonder if anybody objects to the procedure in theory.

My concern is that Mr. Backus isn't here -- whether appropriate measures be taken to avoid duplicate cross-examination and to brief Mr. Backus as to what has been covered; because that's been our experience. Somebody will come in and cover the same ground.

MR. TRAFICONTE: Well, here is what I have done. I have gone over with Mr. Backus what my cross-examination is going to cover. He has gone over with me what he intends to cover. So that's one check, and they don't overlap.

We will also make every effort to get transcripts of today. I'm not sure we will be able to get the transcript of tomorrow to him.

JUDGE SMITH: And, of course, I am not giving full credit of my concern to the continuing presence of Ms. Doughty, who will be with him; is that correct?

MS. DOUGHTY: Right.

JUDGE SMITH: You will be with him during cross-examination?

MS. DOUGHTY: Yes.

JUDGE SMITH: His cross-examination.

All right, that takes care of my concern.

If there are no objections, go ahead and we will plan on that.

MR. TRAFICONTE: And just a final note on the cross-examination plan.

As I did in the first instance when Mr. Donovan was here before, I do have a supplement to this which I will distribute tomorrow, which takes up the individual discrete contentions or issue areas that I would be cross-examining on which would essentially be Roman Numeral IV.

JUDGE SMITH: 43F is a title. That is "Exercise Report dated September 1, 1988."

MR. FLYNN: Yes.

JUDGE SMITH: Correct? Okay.

CROSS-EXAMINATION

BY MR. TRAFICONTE:

Q Mr. Donovan, the exercise report that's been bound into the record as Exhibit 43F, is it a verbatim or identical copy with the September 1 exercise report as it was distributed in September?

A (Donovan) With the exception of the handwritten comment that's in the bound copy which was not inserted by me.

Q And other than the corrects that you are making

today, there have been no changes in these two documents?

A (Donovan) That's correct.

MR. TRAFICONTE: Yes, I have an extra.

JUDGE MCCOLLOM: Well, I've got it now. Now that I know that.

JUDGE SMITH: What would probably be helpful as we begin this cross-examination, if we had a -- have an excerpt from the FEMA guidance memorandum which sets out the exercise objectives 1 through whatever they are. And it seems to be a relatively rare document. And I wonder if some time you could provide us with that. I suspect it's going to come up.

MR. TRAFICONTE: Your Honor, I'm going to have it marked as an exhibit probably within the first hour.

JUDGE SMITH: Okay. Fine. Great.

MR. TRAFICONTE: And I have copies of it sitting right here.

JUDGE SMITH: Great.

BY MR. TRAFICONTE:

Q Good afternoon, Mr. Donovan.

You recall earlier testimony where you stated that there are four legs essentially to a FEMA review of an emergency plan or emergency preparedness.

Do you recall that testimony?

A (Donovan) Yes, I do.

Q Can you just again remind us of what the four component parts of a FEMA review are?

A (Donovan) The review of the plan, evaluation of an exercise, verification that the resources and equipment so identified in the plan are present, and the verification of training of the responders identified in the plan.

Q The verification of the training, is it a fair statement to say that the adequacy of the training that individuals responsible for emergency preparedness have received is tested and evaluated during the exercise?

Is that a fair statement?

A (Donovan) As a general rule, that is a fair statement.

Q I'm not trying --

A (Donovan) On any given exercise we may not test all the components of the plan, but those portions of the plan that are being tested, we do, in effect, evaluate the training of the individual's ability to implement the plan.

Q Let's start off with some basics.

You just mentioned depending on the type of exercise. There are types of exercises in terms of scope, are there not?

A (Donovan) Yes, there are.

Q Can you just briefly describe the difference between the qualifying exercise, perhaps called the "pre-licensing exercise," and the other types of exercises?

A (Donovan) If I can.

To begin with, the document that the Board just referenced is FEMA's Guidance Memorandum referred to as EX-3 and there has been an amendment to EX-3.

EX-3 describes 36 --

Q Let me interrupt you.

MR. TRAFICONTE: Let me mark it now. That would be the easiest. There is no reason why we can't have it available now.

JUDGE SMITH: 92.

MR. TRAFICONTE: I would like to distribute a document and have it marked as the next Mass AG Exhibit for identification.

It's a multi-page document that's headed "Guidance Memorandum EX-3." It's number 92.

(The document referred to was marked for identification as Mass AG Exhibit 92.)

(Document proffered to parties.)

BY MR. TRAFICONTE:

Q Mr. Donovan, you recognize this document, do you

now?

A (Donovan) Yes, I do.

Q Can you describe it?

A (Donovan) Well, to describe the document, it contains several things. One of the things it contains is 36 exercise objectives.

It contains a series of milestones or steps that the FEMA region is to use in pre-exercise activities and trans-exercise activities during the exercise and post-exercise activities.

And it describes a process for public briefings and public meetings following an exercise.

To be specific to Mr. Traficonte's question, he asked how does FEMA determine the extent of an exercise?

We take a plan and we consider the plan can be demonstrated by 36 exercise objectives. In the conditions for a utility prepared offsite plan we have added a 37th exercise objective, which was contained in a document referred to as "Amendment to EX-3" which was issued on March 7th, 1988.

So in setting up a prequalifying or licensing condition exercise, to be specific to your question, that type of an exercise in accordance with the Nuclear Regulatory Commission rule should demonstrate as much of the plan as reasonably achievable.

So by context we would try to achieve demonstrations of as many of those 36 or 37 exercise objectives as achievable.

In terms of breaking the exercise objectives into parts of response play, we normally break them into three categories and we put three different labels on them.

The first label would be called the "plume pathway" portion of the exercise where we would deal with the notification, mobilization, activation of response facilities, response personnel; and we would have them deal with protective action assessment, decision-making, and implementation phase of what is normally called the "emergency phase," from minutes to hours after the start of an exercise.

The second phase we commonly refer to as the "ingestion phase." That is, we are now dealing with the biological pathway to man. We have, obviously, are supposing that we had a release. We deposited nuclear materials in the environment, and what actions are taken to assess the effect of this deposition. And if necessary, what actions are taken to protect man from consuming foods and food stuffs that might be contaminated.

The third phase is called the "re-entry and recovery phase." And that is really three things. There is one: the return of the public to areas that are not

contaminated. We usually call that "return."

And then we go into re-entry and recovery, if we have deposition on the ground we make assessments and we make decisions to see whether, in wind, that portion of the EPZ could be reoccupied.

For the purposes of this exercise we demonstrated -- the offsite response organization for New Hampshire Yankee demonstrated 34 of 36 exercise objectives.

Now I said, 37; not all of the exercise objectives apply to any one given site. This particular site, the State of New Hampshire and the State of Massachusetts have chosen not to recommend KI for the general public in the event of an emergency. And that's identified as exercise objective 17 in the document you were given. So that objective is not applicable to this site.

The State of New Hampshire demonstrated 34 of 35 exercise objectives. And the State of Maine demonstrated 21 of 35. Realizing the State of Maine is only in the ingestion pathway, those exercise objectives that apply to the plume pathway, obviously, don't apply to the State of Maine.

To do so we set up the exercise objectives. We went through Extent of Play, discussions, and agreements, and the scenario was developed. The scenario was developed with three phases of exercise play to deal with the three

labels that I applied: plume pathway; the ingestion pathway; and recovery and re-entry pathway.

And those three phases were played on two exercise days: June 28 and June 29.

Q If I could direct your attention to page 10 of Mass Exhibit 92.

JUDGE SMITH: Are we going to get the 37th exercise objective into evidence? Do you intend --

MR. TRAFICONTE: That was my intent.

I will make the proffer of this document right now, sure. I would like to offer Mass Exhibit 92 which is the Guidance Memorandum EX-3 into evidence.

JUDGE SMITH: No, I meant the 37th --

MR. TRAFICONTE: Oh, I'm sorry, 37th.

JUDGE SMITH: Yes. We've already done that and it has been --

MR. TRAFICONTE: No, there is an additional document which I also intend to mark and I can do that, if that's convenient.

I have questions immediately following the questions on this document.

JUDGE SMITH: All right.

But for now Exhibit 92 is being offered.

MR. TRAFICONTE: Yes.

JUDGE SMITH: And there are no objections.

I think we already went through this, didn't we?

MR. DIGNAN: No.

I just wanted to confirm one thing.

Mr. Donovan, as I understand it, what has been marked as Massachusetts Attorney General Exhibit 92, but for the absence of the 37th objective, are the objectives that were utilized in the graded exercise at Seabrook; is that correct?

THE WITNESS: (Donovan) That's correct.

MR. DIGNAN: No objection.

(The document referred to, previously marked for identification as Mass AG Exhibit 92, was received in evidence.)

MR. TRAFICONTE: I'll distribute another document. This being an amendment to Guidance Memorandum EX-3.

(Document proffered to parties.)

BY MR. TRAFICONTE:

Q Now, Mr. Donovan, can you identify --

MR. TRAFICONTE: First, let me just have this marked as the next exhibit which is 93.

(The document referred to was marked for identification as Mass AG Exhibit 93.)

BY MR. TRAFICONTE:

Q Now, Mr. Donovan, do you recognize this document?

A (Donovan) Yes, I do.

Q What is it?

A (Donovan) It's commonly referred to as the Amendment to Guidance Memorandum EX-3 and it's specifically targeted to the exercise in the utility prepared offsite response plans.

Q And can you, for the benefit of the Board and the record, can you direct us to the language in this document where the 37th objective is set forth?

A (Donovan) It's on the bottom of page two, the last paragraph and the group of paragraphs with number three. And the sentence set indented with that paragraph starts: "The following is a new exercise objective that parallels the Supplement 1, Guidance Supplement 1 referring to NUREG-0654, FEMA-REP Sup. 1.

This objective is as follows: demonstrate the capability of utility offsite response organization personnel to interface with nonparticipating state and local governments through their mobilization and provision of

advice and assistance."

MR. TRAFICONTE: I would like to have this document, Mass AG 93 also admitted into evidence, Your Honor.

JUDGE SMITH: Just describe it a little bit better.

MR. TRAFICONTE: I'm sorry.

Well, it's actually two memoranda. The first being a memorandum from Grant Peterson for Regional Directors, dated March 7, 1988 to which is attached a four-page document with the heading, "Guidance Memorandum EX-3 Amendment." With the date March 7, 1988.

JUDGE SMITH: Are there objections?

MR. FLYNN: Well, this is not an objection, but I would point out that there are several pages or several parts of pages which have been underlined. And that, of course, did not appear in the original document.

I would just like Mr. Traficonte to acknowledge that --

JUDGE SMITH: Disregard underline?

MR. TRAFICONTE: I won't offer the underlining.

MR. FLYNN: No objection.

JUDGE COLE: Or crossed out, as it is on page three.

MR. TRAFICONTE: Poorly underlined. I won't offer

that.

(Laughter)

MR. FLYNN: We will stipulate that nothing should be inferred from that.

(Laughter)

BY MR. TRAFICONTE:

Q Just a quick question.

Mr. Donovan, if we examined the 36 objectives in Exhibit 92 and the additional one that you have referred us to in Exhibit 93; and then we looked at Applicants' Exhibit 43-F, your report, it's accurate, isn't it, that portions of your report set those objectives out and then contain an evaluation and a narrative summary that runs to each of the objectives; right?

A (Donovan) That's correct.

The objectives were repeated several times.

Q And it's a fair statement that the structure of your report, in that capacity at least, is very similar to the structure of your plan review where you had items or criteria and planning standards taken from NUREG-0654 set forth and followed by an evaluation and a narrative; correct?

A (Donovan) That's correct.

Q And just to close that out.

In fact, it's your view of what your exercise

report is and the nature of your evaluation of the exercise is that it tracks your review of the plan. That's to say that NUREG-0654 sets forth the planning standards that guide your review of the report.

And these exercise objectives similarly guide your evaluation of an exercise?

A (Donovan) That's correct.

And as you pointed out, the exercise objectives contain a parenthesis following each objective which includes review criterion -- a reference to the review criterion back in Sup. 1 or 0654 as it applies.

Q Now, is it a fair statement that the exercise objectives were derived from the NUREG requirements?

A (Donovan) That was its intention; yes.

Q Now again, I would like to go back to Exhibit 92 at page 10, and make sure that I understand the differences between a qualifying exercise and some other type of exercise.

Page 10 sets forth, does it not -- let me strike that. Page 10 describes the groupings of these 36 exercises; correct?

A (Donovan) It sets about three groups of exercise objectives, and it contains descriptions of the groups of the exercise objectives.

Q For example, in the second full paragraph the

objectives 1 through 15 are described as "core" objectives; do you see that?

A (Donovan) Yes, I do.

Q Now the other exercise objectives are grouped in groups B and C.

Is it a fair statement that qualifying exercises, with some exceptions, but generally qualifying exercises have to meet all the objectives?

A (Donovan) Qualifying exercises should demonstrate all appropriate objectives in all three groups.

Q And you're hedged there with the word "appropriate," all you're trying to add there is that, for example, as you have indicated KI not being recommended by New Hampshire and Massachusetts is not an appropriate objective at this site. But otherwise, all of the objectives are and must be demonstrated to make out a qualifying exercise?

A (Donovan) Well, there is one other objective that doesn't apply.

Q Which is that, just so the record is clear?

A (Donovan) Objective 36, which is found on page 16 of the document. It says: "Once in a six year cycle we should have an unannounced exercise."

Q It has to be an unannounced exercise?

A (Donovan) Right.

Q But the qualifying exercise need not be unannounced?

A (Donovan) That's correct.

Q All right.

The nonqualifying exercise at an already licensed plant, I take it, could meet the FEMA requirements and not test all of the objectives; correct?

MR. DIGNAN: Objection, relevancy.

The only thing that is before this Board at this time is the qualifying exercise. I don't see any relevancy of questions on the nonqualifying exercise.

MR. TRAFICONTE: I think the relevance will become clear, and if I can just pursue the line for a few minutes.

MR. DIGNAN: All relevancy becomes clear if you're allowed to pursue it long enough.

I object.

JUDGE SMITH: Well, he's trying to distinguish between the qualifying and the nonqualifying and one way to do it is describe the qualifying. And another way to do it, equally relevant, is to describe which of those are non -- I think I got it mixed up. But overruled.

(Laughter)

MR. TRAFICONTE: I understand the last one.

MR. FLYNN: I would like to suggest a slightly different terminology. The term that FEMA uses to describe

what Mr. Traficonte has called the nonqualifying exercise is biennial exercise; and those are the exercises that are done in a six year cycle for plants which have already been licensed. To call them nonqualifying suggests more than the term "biennial exercises."

JUDGE SMITH: In any event, the purpose of your objection will be observed, Mr. Dignan, if the inquiry goes into it. I don't think it will, though.

MR. TRAFICONTE: We will qualify "biennial". Biennial?

MR. FLYNN: Biennial.

BY MR. TRAFICONTE:

Q The biennial exercise compared to the qualify need of address or test of something less than all of the objectives, correct?

A (Donovan) That's generally true. But once in a six-year cycle, which -- and you have biennial exercise frequency, you have three exercises. Usually one of those three exercises you do approach a similar mix of objectives that you would approach for a qualifying exercise.

Q No dispute.

What you accomplish at the qualifying exercise in one exercise, you effectively accomplish at an already licensed plant through a six-year cycle of three exercises, correct?

A (Donovan) No, that wasn't what I was trying to say.

I was saying one of those three exercises would normally have a mix of objectives that would come close to --

Q I see.

A (Donovan) -- a qualifying exercise. Because normally by the three groups that you drew the Board's

attention to, if you have a plume path, you have to have a plume pathway exercise every year, or every exercise. So we have to have three plume pathway exercise. And once during the six years you have to follow the plume pathway exercise with an ingestion and a reentry and recovery exercise.

So for that one exercise out of three over the six-year cycle, you usually end up with a mix of exercise objectives that approximates the same mix that you would find using the term that you have applied to a qualifying exercise.

Q Let me close it up this way.

As far as you know, is there a safety dimension, public safety dimension to the distinction between, and I'm going to use the word "scope". Is there a safety dimension in the distinction between the scope of the qualifying exercise and the biennial exercise?

MR. DIGNAN: Objection.

MR. FLYNN: I don't understand the question.

MR. DIGNAN: We are just pursuing the difference between the two exercises, and I don't -- there is only one before the Board. I can think of all kinds of reasons why I would like to pursue it, because of other factors in the case, but it's not relevant to the inquiry before this Board.

MR. FLYNN: And my point is that the part of the

question that asks about safety scope is entirely unclear. I do not understand what that is asking for.

JUDGE SMITH: Well, then we will avoid the relevancy objection by sustaining your objection, Mr. Flynn.

BY MR. TRAFICONTE:

Q Has FEMA formed a judgment that the qualifying exercises for reasons of public safety need to demonstrate the entire range of exercise objectives?

A (Donovan) I'm unaware of any specific guidance or policy memo that makes such a statement.

Q That links this distinction to matters of public safety?

A (Donovan) That's correct.

MR. FLYNN: I think we are bordering on legal argumentation here. It's perfectly clear to everyone in this case that the definition of a qualifying exercise was established by the Commission in the Shoreham litigation.

JUDGE SMITH: I think it's helpful to understand what a qualifying exercise is in the context of --

MR. FLYNN: No, I haven't objected to the line. Well, I guess it sounds like I have, but that's not my point.

If the inquiry is where did the decision come from to have as many objectives as possibly in a qualifying exercise, that's already a matter of record. That came out

of the Shoreham litigation.

JUDGE SMITH: I didn't know that.

MR. TRAFICONTE: I didn't know that.

JUDGE SMITH: But I think the logic of the exercise objectives should be known right at the beginning so that we understand just what it is that you seek to do on a qualifying exercise.

I recognize your objection --

MR. FLYNN: I will subside.

JUDGE SMITH: -- that we are not talking about requalifing.

What do you call the other kind?

MR. DIGNAN: Biennial.

MR. FLYNN: Biennial.

JUDGE SMITH: Biennial. We are not litigating those. And yet they are there, and they are a benchmark for comparison. And why do you have some and why do you have another is going to explain to us some of the reasoning that goes into the makeup of the qualifying exercise.

I just assumed until this came up this afternoon that once qualified, they didn't believe it was necessary to show everything every biennial.

What's the difference? What is the philosophy between the difference?

THE WITNESS: (Donovan) If you take the approach

that if we have a set of response organizations that have never exercised their plan, and if those response organizations have asked for a FEMA finding on their plans and preparedness, one of the steps we would do is to see in an exercise how much of their plan that they could implement. Because we are asked then to provide a FEMA finding.

And in doing so, both the Nuclear Regulatory Commission has defined different language in their regulations than FEMA has. FEMA has no difference in its language between a biennial exercise and the approval exercise as I believe the words FEMA's 350 uses.

But basically we look to see if this planning effort can be implemented, and we don't want to wait six years to see all of the planning effort implemented in an exercise. So the qualifying exercise then starts off with the premise that we would like to see as much of the plan implemented as reasonably achievable.

BY MR. TRAFICONTE:

Q And then after that's been done and a license issued, biennial exercises need not demonstrate the whole range of capabilities?

A (Donovan) Right. But as I --

Q It can demonstrate something less than the whole range. As long as within six years the whole range has

basically been tested --

MR. DIGNAN: Objection. That's three questions.

MR. TRAFICONTE: Well, he was asked --

MR. DIGNAN: No, I am going to get on the form now. You are either going to ask a question and let him answer, or you are going to hear form objections every five minutes from me.

MR. TRAFICONTE: He answered --

MR. DIGNAN: I object.

JUDGE SMITH: What he was getting there, Mr. Dignan, and it's not on the record, he was getting body language of agreement in each phase of the question, and it all seemed logical at the time, but the record isn't clear.

So restate your question.

MR. TRAFICONTE: Just let me state to the witness since we have done this many, many times, I would appreciate it if you could listen to the end of my question, and I will attempt to listen to the end of your answers, too.

BY MR. TRAFICONTE:

Q The point being it's a fair statement, isn't it, then that at the outset, before a license issues, you look for a demonstration across the whole range of emergency response capabilities?

After the license issues, at two-year intervals you seek a demonstration of something less than the whole

range with the knowledge that over a six-year period you will essentially have the whole range of capabilities demonstrated.

A (Donovan) I'll try to answer, but I'll answer differently.

FEMA's regulations for review and approval of offsite preparedness plans have a Section 395 that deals with exercises. And it says for the approval exercise, which is supposed to be within one year of the licensing event of a site -- now two years as you are indicating with your hand signals -- that they will have a full participation exercise. And in that exercise, they should demonstrate as much of the plan as reasonably achievable.

Following that, then FEMA goes into a mode of reevaluating preparedness in a biennial exercise, every two years. And we take these 36 or 37 objectives contained in our guidance memorandum and we're to keep track record of those objectives and how they are demonstrated.

The Core A objectives should be demonstrated at each exercise. Those in Core B that are applicable to the scenario or to the planning at that site should also be demonstrated in each exercise.

So that leaves maybe some of Core B and all of Core C to be demonstrated once in one of the three exercises over six years.

The point Mr. Traficonte has asked me is less than is one way than saying it for the first six-year cycle, because when you do the first exercise, you demonstrate as much as reasonably achievable. As I pointed out in this particular case, one of the objectives does not fit, Objective 36, because that calls for an off-hours, unannounced exercise.

The point I tried to make in answer to his question is, out of the three exercises after the first cycle is done, when you deal with the ingestion and reentry pathway objectives, you end up with an exercise that's almost as complicated and almost as wide, if you are using the term "scope" to cover how many objectives are covered in a given exercise as what you referred to as a qualifying exercise.

Q All right. That's all I am going to do -- that's as far as I'm going to pursue that distinction.

Let me go back, Mr. Donovan, to the inquiry as to the four prongs of your review. I was asking you about the training. And you recall that my question to you was, is it a fair statement that you evaluate the training or the quality of the training that's been made available to the emergency responders primarily through an exercise.

A (Donovan) If you looked to our approach to an exercise as a test of the plan and a test of the ability of

the people to implement its plan, then an exercise becomes an evaluation of the capabilities of the persons who respond on that given exercise day.

And in that regard, yes, it's ar evaluation of the training that they demonstrate, or resource capability that they demonstrate.

Q Let's just focus only on training.

You are aware, are you not, that there are some contentions at issue here regarding the adequacy of the training of the personnel, the ORO personnel on which the SPMC relies?

You are aware of that, right?

A (Donovan) Yes, I am aware.

Q And you were in here last month and we asked you some questions about training modules. You reviewed, during your plan review, you reviewed certain training modules used to train ORO personnel, did you not, as part of your plan review?

A (Donovan) Yes, I did. I reviewed training modules and I reviewed training records and I reviewed other documentation as part of the training program.

Q And you came to a view that, as far as your plan review is concerned, the training program appeared to be adequate, correct?

A (Donovan) Yes, I did.

Q But you need or you believed that you needed an exercise and the results of an exercise before you were prepared to make the judgment or form the judgment that the training was indeed adequate, correct?

A (Donovan) That's one of our "legs" as you referred to it, yes.

Q Now as to the verification of the resources, FEMA basically verifies the resources that are described in a plan during the plan review. And if there is a resource is not verified during the plan review, it's going to be verified during an exercise.

Isn't that correct?

A (Donovan) It could be verified in an exercise, depending on the scope of the exercise. But we verify the use of resources, the availability of resources, the functionability of resources in an exercise.

Q Now let me ask you a question about the design of this particular exercise, and some of this, and I apologize, might be somewhat familiar. I did pursue this line to some extent the last time you were here.

It's a fact, is it not, that in the January to April 1988 time frame you were asked to review the SPMC as a plan and make a determination whether it was advanced enough to permit a meaningful exercise?

That's accurate, is it not?

A (Donovan) I was asked to review the plan and make a recommendation whether the exercise could proceed based on the plan, yes.

Q Now it's a fact, is it not, that a precisely identical task had been assigned to Mr. Thomas, who was in charge in that time frame of the exercise of the New Hampshire Plan, correct?

MR. FLYNN: Objection. Relevance.

MR. TRAFICONTE: I'm not sure what the objection is.

JUDGE SMITH: Relevance. What's the relevance. I think from the history of the case I can infer relevance, but I think that given the objection, you should state what it is.

MR. TRAFICONTE: Well, there is no hesitancy in stating the relevance.

I wanted to, in fact, show him a document that Mr. Thomas had written to Mr. Strome in the March '88 time frame that enumerates, I believe it's 51 impediments to an exercise of the New Hampshire plan, and I was going to inquire -- Mr. Thomas is not on the stand. He is our only FEMA witness on the exercise of the New Hampshire plan as well as the SPMC.

JUDGE SMITH: Is that one of the documents you just shook loose at discovery?

MR. TRAFICONTE: Yes, yes.

The other point I just want to make, just so the record is clear. I intend to cross-examine him on the exercise, both on the New Hampshire side as well as on the Massachusetts side. I mean maybe that --

MR. FLYNN: I understand that.

MR. DIGNAN: I haven't objected. Don't look at me.

MR. TRAFICONTE: No, but --

(Laughter.)

MR. DIGNAN: I'm sitting here all ears. I'm so excited.

MR. FLYNN: My point is that whatever we thought might be wrong with the plan, first of all, the plan has already been litigated. But to the extent that there were problems with the plan that might have been impediments to the exercise, that issue is subsumed by the exercise itself.

Our judgment on the implementability of the plan is expressed in the exercise report which we are defending. We exercised the plan as it existed at the time of the exercise. There was some evolution going on up until about a week before the exercise.

So what is relevant is what was exercised.

MR. TRAFICONTE: This is an old refrain.

JUDGE SMITH: This is Thomas that said we're not

ready to exercise. We've got some impediments to a meaningful exercise. But there was an exercise anyway.

Overruled.

BY MR. TRAFICONTE:

Q I think there was a question to you, Mr. Donovan. I'll restate it.

The assignment of determining whether the New Hampshire plan was advanced enough to permit exercise was given to Mr. Thomas, was it not?

A (Donovan) Yes, it was.

Q Now I would like to show you a document and ask if you can identify it.

(Document proffered to the parties.)

MR. TRAFICONTE: First, I would like to have this document, which is on FEMA letterhead and is a letter from Edward Thomas to Richard Strome, dated March 31, 1988.

I would like to have it marked as the next Massachusetts AG Exhibit No. 94.

(The document referred to was marked for identification as Mass AG Exhibit 94.)

BY MR. TRAFICONTE:

Q Mr. Donovan, do you recognize this document?

MR. DIGNAN: Could I make an inquiry?

I thought I heard an exchange between you and Judge Smith where he asked you if this was one of the documents you just shook loose on discovery, and I thought I heard you say, yes. Is that right?

MS. McPHETERS: Your Honor, this was one that was provided earlier, not in the last round of document production. Upon looking at it this was produced some time ago.

MR. DIGNAN: Yes. This has been around for a long time.

MR. TRAFICONTE: Has it?

MR. DIGNAN: Yes.

MR. TRAFICONTE: I may be -- okay.

MS. McPHETERS: The Bates Stamp is very faint on the Xerox copy, but you can see it in the upper right hand corner, so we can be sure this was produced --

MR. TRAFICONTE: All right.

MS. McPHETERS: -- some time ago before the commencement of hearing.

MR. TRAFICONTE: I stand corrected then. I thought I had just gotten it.

MR. DIGNAN: It was a public document. It was sent to Strome.

JUDGE SMITH: So what? It doesn't matter.

MR. DIGNAN: Yes.

JUDGE SMITH: I was wrong.

You can say it, I was wrong.

MR. DIGNAN: No, you just asked a question.

MR. TRAFICONTE: He wants me to say it.

I was wrong.

(Laughter)

MR. TRAFICONTE: I can do that, though I'm blushing. I don't know why.

(Laughter.)

JUDGE SMITH: Before I forget, was Exhibit 93 offered? That's the exercise 3 amendment.

Are you going to offer that?

MR. TRAFICONTE: Yes. I would like to offer that.

JUDGE SMITH: Are there objections?

(No response)

JUDGE SMITH: Received.

(The document referred to, previously marked for identification as Mass AG Exhibit 93, was received in evidence.)

BY MR. TRAFICONTE:

Q Now, Mr. Donovan, you recognize Mass AG 94, don't you?

A (Donovan) Yes, I have seen this document.

Q And had you had an opportunity at the time that it was drafted and sent, had you had an opportunity to review it at that point?

A (Donovan) No, I did not.

Q Do you recall in what time frame you first saw the document?

A (Donovan) Some time in early May.

Q I'm sorry?

A (Donovan) Some time in early May of 1988.

Q Are you aware whether the changes or the corrections that are enumerated in this letter, are you aware whether the changes and corrections were made prior to the exercise in June by the State of New Hampshire?

A (Donovan) I'm aware. I can't recall all of the specifics. But if you would like I will describe to you what happened.

Q Would you do that? Yes.

A (Donovan) Following this letter the State of New Hampshire prepared a response and submitted the response to FEMA Region 1.

FEMA Region 1 distributed the response to the Regional Assistance Committee, and for purposes of coordination I attended that Regional Assistance Committee meeting where we reviewed the responses to this letter.

Towards the end of the processed, it occurred some time in the month of May, I can't give you the specific dates, but by the end of the month of May and on or June 3rd I was given the responsibility for both -- all three sets of plans dealing with the Seabrook site.

And I believe I was the one who wrote the letter back to the State of New Hampshire stating that the responses to this letter had met all of our conditions except -- for purposes of proceeding with the exercise, and they produced what was referred to as 6-88 blue line or red line changes to their plan.

And those were produced to us as an interim change which were codified in an 8-88 formal amendment to the New Hampshire RERP.

We identified two issues which we made acknowledgements in our Extent of Play that we would not deal in the exercise with the issue of requesting that they be demonstrated, but we would like to see the plan amended in the future. And at that time we would deal with those issues.

MR. FLYNN: Excuse me, I would like to interrupt just for the sake of the clarity of the record.

Mr. Donovan, you said in the answer that you just gave, in your response to the State of New Hampshire they had addressed all the issues except, and I didn't hear the number.

THE WITNESS: (Donovan) Two.

MR. FLYNN: Two. Thank you.

BY MR. TRAFICONTE:

Q Can you right now refer us to -- you've held up the Extent of Play document, can you refer us to the two items that --

A (Donovan) Well, it's easier for me to refer to the exercise report.

Q All right.

A (Donovan) In this exercise report, as was discussed earlier, the structure of the report once you get past the tables, which document, the facts of the exercise is a narrative for each of the offsite response

organization: the State of Maine; the State of New Hampshire; and New Hampshire Yankee offsite response organization.

And within each one of those narrative sections I begin by stating the exercise objective and following up with an evaluation statement. And if there were exercise inadequacies which we define as issues we list the issues. And further evaluation recommendation for corrective action.

In all three sections following the exercise evaluation section there is a section that's identified as "plan" or "other issues."

And on page 200 of the exercise report -- that's my page sequence, I'll have to go get 43-F and give you that.

Q 208 of 428.

JUDGE SMITH: Well, the numbering system did comply with the Board's preference. It was one of the examples when it really wasn't necessary.

And I think that since some of us have the original report and not in a form of the exhibit, it doesn't matter. Just make clear that you're referring to the report page number rather than the exhibit page number.

THE WITNESS: (Donovan) So the issues that I identified as part of the review were commitments and plans that called for 24-hour staffing.

And if you look at the Extent of Play for New Hampshire for objective 34 it makes statements that in terms of the reception centers and the staging areas we would not ask for a shift change, a document, 24-hour continuous staffing, because the plan at that time didn't call for 24-hour staffing of those issues.

BY MR. TRAFICONTE:

Q Now there was another one?

There were two items?

A (Donovan) No.

Well, there's two separate functions. There's a staging area.

Q Oh, I see.

A (Donovan) And reception centers.

Q Same issue, in other words?

A (Donovan) Same issue, but two separate locations.

Q I understand.

So going back to Exhibit 94, it's your testimony that upon receipt of this document the State of New Hampshire put together a response which you reviewed. There was a RAC meeting.

Part of the State of New Hampshire's response was, in fact, to do or at least to make some of the corrections that are identified in Mr. Thomas' March 31 letter?

A (Donovan) Yes.

By making -- you used the word "corrections." This list contains a number of items, some which can be traced back to the change in plan or procedure.

Some which call for reporting that certain issues have been corrected.

And so their response to FEMA was, in those areas where we have already effected changes, here is the status that you can come and verify or will verify to you that these things have been done. If you want to go beyond our letter and here is where we will change our plan.

And like I said, it was the Region's position that the issues and Regional Assistance Committee's position that the issues had been satisfactorily addressed as outlined in this letter.

Q In the response by the state?

A (Donovan) Right.

Q And you say it was the Region's position and the Regional Assistance Committee's position.

Was it Mr. Thomas' position as well?

A (Donovan) Well, Mr. Thomas is the region.

At that time he was the lead official. I'm just saying, by the time it got to the point of formally responding to the State of New Hampshire I had been given the responsibility for the whole site and for all the plans, so I'm the one who actually signed the letter back or I

prepared a letter. I don't believe I signed it. I believe I prepared it for the Regional Director to sign back to the state.

Q Do you know one way or the other whether Mr. Thomas agreed with you and the RAC that the response by the State of New Hampshire to these inadequacies was sufficient to permit a meaningful exercise?

MR. FLYNN: Objection, irrelevant.

Mr. Thomas' opinion is irrelevant.

JUDGE SMITH: Overruled.

MR. FLYNN: All right.

BY MR. TRAFICONTE:

Q Do you remember the question?

A (Donovan) I am unaware of any opposition to the position that we took that the issues had been satisfactorily addressed except for the two that I mentioned.

Q You're unaware.

Are you familiar with Mr. Thomas' position one way or the other?

A (Donovan) He was present at the meeting.

Q And he voiced no --

A (Donovan) We went down all of these issues from FEMA Staff's position, from advice, and consent from the Regional Assistance Committee's position in reviewing the

response of the state to these issues; it was the consensus of everybody that the issues had been satisfactorily addressed.

Q And that the New Hampshire plan was, in fact, ready to be exercised?

A (Donovan) When the implied changes were produced.

The state came in with a position, we are proposing to do this. We're not going to do it until you tell us that you agree that it is a satisfactory fix.

And the end-product in doing that,

they produced blue line -- I forget the term they used -- they produced interim changes to their plan where those changes were called for in the plan.

Q Now, you have had occasion, Mr. Donovan, to review the FEMA report on the February 1986 New Hampshire exercise, have you not?

A (Donovan) No, I have not.

Q Let me put it again, I'm surprised by your answer.

There was a February 1986 exercise of the New Hampshire plan; correct?

A (Donovan) That's correct.

Q And FEMA wrote an evaluation of that exercise in which it found or noted, I believe, 107 exercise inadequacies; correct?

A (Donovan) That's correct.

Q And part of the purpose and scope of the June 1988 exercise was, in fact, to test whether or not the State of New Hampshire could perform adequately in those areas where it had not performed adequately in 1986; correct?

A (Donovan) That's correct.

Can I amend my previous answer?

Q Yes?

A (Donovan) 112 items.

Q 112 items, all right.

A (Donovan) The exercise report contains a section in Appendix B that's referred to as "Verification of corrective actions."

JUDGE SMITH: This is your current exercise report?

THE WITNESS: (Donovan) Yes, that's correct.

And the issues that he is referring to, there were exercise related. All of the issues that he referred to, some -- most of which were exercise related, some we determined to be planned related and were corrected to plan. And then plan changes are contained in our exercise report as Appendix B.

MR. FLYNN: I think there may --

THE WITNESS: (Donovan) And we call these things "Verifications of corrective actions." And to put it into

context, when FEMA identifies an exercise inadequacy we ask for corrective action. And offsite response organizations usually give us commitments for corrective action, if the action is demonstrable in an exercise we then verify it at a future exercise, whether that corrective action is indeed in place; and we call these "Verifications of corrective action."

MR. FLYNN: I think there may be some unnecessary confusion here.

Mr. Traficonte has indicated surprise at the answer that Mr. Donovan has not reviewed the document. And I think he may have understood the question in the sense of being part of the official review.

BY MR. TRAFICONTE:

Q Let me ask the question again.

I think the question was: had you at some point reviewed or have you at some point reviewed the FEMA report on the February 1986 New Hampshire exercise?

A (Donovan) I reviewed the report to the extent that I extracted the exercise issues, as I just described, and put them in Appendix B of this exercise report.

In extracting them from the exercise report I not only put them in the context of putting them in the report, they also became an assignment to an exercise evaluator or groups of evaluators depending on the condition and case to

verify where it was appropriate that these corrective actions had indeed been corrected.

JUDGE SMITH: I think it's probably clear within the context, but it would be helpful for you to state expressly when you're referring to the report, you say this report.

THE WITNESS: (Donovan) This report.

JUDGE SMITH: You're talking about --

THE WITNESS: (Donovan) I reviewed the 1986 report.

JUDGE SMITH: Applicants' Exhibit 43 F.

THE WITNESS: (Donovan) Right.

JUDGE SMITH: The September 1988 report.

THE WITNESS: (Donovan) That's correct.

JUDGE SMITH: In each other instances, I think you referred to the 1986 report by the date.

THE WITNESS: (Donovan) Right.

BY MR. TRAFICONTE:

Q Now, in your review of the inadequacies set forth in the 1986 report, did you have occasion to form your own judgment as to whether or not you agreed with the characterization by FEMA of the performance by New Hampshire as inadequate?

A (Donovan) No. I did not create any separate judgment.

Q You took it as a given that there had been 1986 exercise, that 112 items had been found -- determined to be inadequate; you just took that as a given?

A (Donovan) I had no choice; that's the way the system works.

The exercise report was a report of record. The state acknowledged that these were exercise inadequacies and offered corrective actions. And I didn't go any farther than what I just described.

I accepted them as exercise inadequacies that had to be verified in the future exercise, and extracted what I felt was an appropriate description of those exercise inadequacies to set up the process for verification corrective actions.

Q In your own judgment, one way or the other, as to whether you thought the performance in '86 merited an inadequacy or perhaps you thought it did not, played no role in your setting up the '88 exercise to verify the corrective actions?

A (Donovan) That's correct.

I performed no review with the purpose of implying my judgment on the issues. I took the issues as issues and proceeded from that point forward.

MR. TRAFICONTE: I have a follow-up question, Your Honor, and maybe we could take a break at that point.

BY MR. TRAFICONTE:

Q If in '86 there had been an ARCA as to an objective -- well, we ought to lay the ground work for that.

It's a fair statement, is it not, that exercise performance is judged either adequate or inadequate. And if exercise performance is judged inadequate, the inadequacy is characterized as a deficiency or it's characterized as an area requiring corrective action, otherwise known as an ARCA, an ARCA.

That's an accurate statement, is it not?

A (Donovan) That's correct.

And I draw to the Board's attention, on page three of the exercise report, four full paragraph on that report contains these definitions of exercise inadequacies.

JUDGE McCOLLOM: Your page three?

THE WITNESS: (Donovan) My page three, that's correct.

MR. TRAFICONTE: Just a last question on --

JUDGE SMITH: Wait a minute.

MR. TRAFICONTE: I'm sorry.

(Pause)

MR. DIGNAN: 11 of 428, Your Honor, on the global system.

JUDGE SMITH: Read back his answer.

MR. TRAFICONTE: Fourth full paragraph. The

fourth paragraph, I think he said.

(Pause)

JUDGE SMITH: All right, never mind.

Go ahead.

Did you want to break?

MR. TRAFICONTE: I just want to ask one question along that line.

BY MR. TRAFICONTE:

Q The 1986 exercise report identified both ARCAs and deficiencies with regard to the performance by the State of New Hampshire; correct?

A (Donovan) Yes, it did.

Q And it was the purpose of the '88 exercise to verify the corrective actions both for the ARCAs and for the deficiencies; correct?

A (Donovan) That was one of the purposes.

Q One of the purposes?

A (Donovan) Yes.

Q Fine.

If there had been an ARCA in '86 and another ARCA in 1988, how would FEMA evaluated -- how would have FEMA evaluated that situation?

A (Donovan) Well, if it was an ARCA in '88 it would have considered an ARCA.

Let me answer it this way -- or let me try to

expand upon my answer this way.

If an exercise function is demonstrated and evaluation of that demonstration results in an exercise inadequacy, an exercise inadequacy is usually tied to something that's close that we can tie it to, as to what we believe the actual issue is.

And we try to recommend corrective actions that we believe will bring about a change in either the plan or training or equipment preparedness, et cetera.

A similar function -- the same function ensuing exercise could also be evaluated for an exercise inadequacy. But the cause for that particular exercise inadequacy may be the same or may be a different one.

In looking at the two together I would have to look at the context of the two, and that's how I would do it. And that's how I do do it.

MR. TRAFICONTE: This would not be a bad time to take a break.

JUDGE SMITH: All right.

15 minutes.

(Whereupon, a recess was taken.)

JUDGE SMITH: Let's go.

Proceed, Mr. Traficonte.

MR. TRAFICONTE: Thank you, Your Honor.

BY MR. TRAFICONTE:

Q Mr. Donovan, before I go forward, I think I failed to ask you a question about the qualifying exercise in comparison with the biennial exercise.

The standards that FEMA uses to judge exercise performance, for example, whether it judges the performance as an ARCA or as a deficiency, those standards are the same whether the exercise at issue is a qualifying exercise or a biennial?

A (Donovan) Yes, the standards are the same.

JUDGE COLE: I'm sorry. I didn't hear that answer.

THE WITNESS: (Donovan) The standards are the same. We don't have a different set of standards. We have the same set of objectives. I think the point was agreed to that our qualifying exercise would probably test a larger number of objectives than a biennial exercise.

So by definition, the exercise is going to be longer in most cases, but we use the same standards to evaluate each objective.

BY MR. TRAFICONTE:

Q There is the real world difference, of course,

that finding a deficiency for a qualifying plant means that FEMA cannot make a reasonable assurance finding, correct?

A (Donovan) That's the normal policy of the agency and consequence of an exercise deficiency.

Q And before I pass on to another subject, the response by the State of New Hampshire to Mr. Thomas' letter, which is our Exhibit No. 94, I understood that the response enumerated some changes to the plan.

Did New Hampshire resist in any fashion Mr. Thomas' characterization of these items as inadequacies?

A (Donovan) If you are referring to this exhibit --

JUDGE SMITH: That being 94?

MR. TRAFICONTE: Ninety-four, yes.

THE WITNESS: (Donovan) Ninety-four. Close inspection will reveal that there is two lists of items. The list starting on page 1 through page 5, which deals with items prior to the conduct of an exercise in 1998; and starting on page 5 and continuing to the end of the letter, or excuse me, page 8, it says items before the next exercise after an exercise in '88. And then there are items that are suggestions for improvement starting on page 8 going to the end of the letter.

There was two items in this list for the current then proposed exercise, if you go back to the time this

letter was written. And I mentioned the two that we found to be outstanding plan issues but not impediments for the exercise, and they are covered basically by Item No. 4 which is found on page 2 of the memo.

There is another item, Item 13, which deals with the distribution of tone alert radios. That item is also listed in Part 2 of the list to be in place before the next exercise which, if you follow the matriculation of years, would be in calendar year 1999. And there was a decision that it was, you know, the two items are duplicate, and they either should be in one list or the other. And it was a decision that they would be -- should be distributed before the 1990 exercise.

BY MR. TRAFICONTE:

Q All right. Let me go over it one more time, because you have pointed out something to me that I had overlooked.

The first part of Mr. Thomas' letter enumerates inadequacies that he asserted must be corrected prior to the conduct, the holding of the June '88 exercise.

A (Donovan) That's correct.

Q Then the other part of the letter enumerates items that would have to be corrected and there would be verification of those corrections during the exercise.

A (Donovan) No. In the 1990 exercise, if we can

put a label on it.

If you look at page 5, it says during the next exercise, not this exercise; during the next exercise.

Q But if this letter is written in March of 1988, wouldn't the next exercise that's being referred to be the June 1988 exercise?

A (Donovan) Could be. I'm just saying that if I were the State of New Hampshire, I could read this letter two ways.

Q All right.

A (Donovan) And you asked me did the state come back in opposition to any of these items. I don't believe they came back in opposition. I tried to explain to the Board and to you without having the documents with me that the state proposed actions and reported status of other actions. We reviewed all of those items in contrast to this letter, and agreed that the items that this letter identified as being necessary for the conduct for an exercise were satisfactorily addressed either through the status or the offer of an interim plan amendment, which they did propose to do once we agreed that the proposed actions were adequate.

To put it another way, you asked me doesn't this letter represent "all". I just tried to point out to you for the record that it doesn't represent actions that all

have to be done. There are three separate categories of actions in this letter.

Q Now, would you just very briefly describe the process whereby an accident scenario gets proposed, approved if that's the right word, and then used?

How does that happen? How does that work?

A (Donovan) Well, I could refer you to the steps in our Exhibit --

Q Is it in EX-3?

A (Donovan) Well, it outlines the process. It doesn't describe how it works. But I will at least follow those steps with you to answer your question, if that's acceptable to you.

Q It is, yes.

A (Donovan) If you would turn to page --

Q With the focus primarily in the answer, if you could, on who is doing what.

A (Donovan) I will try to do that.

Q All right.

A (Donovan) If you turn to page 2 of EX-3, it lists milestones. And the first milestone that it lists is the submittal of exercise objectives that the offsite organization has proposed to demonstrate in the exercise.

And in that context, the first step is to review and agreement upon the exercise objectives to be

demonstrated.

Offsite organizations propose, and in this category FEMA reviews the proposed exercise objectives.

Q Now as we've discussed already as to a qualifying exercise, there is very little room for negotiation on that point, correct?

A (Donovan) That's correct.

Q Okay, fine.

A (Donovan) The next steps says that you meet and you agree upon Extent of Play.

Q All right. That was going to be my next line anyway.

Can you give us, and we now know we have in evidence as an Attachment A to your testimony, we have the Extent of Play.

Can you give us a quick description of what the Extent of Play is?

A (Donovan) The Extent of Play constitutes agreements between FEMA and the offsite response organizations, and it can be phrased two different ways. It could be agreements on how the plans and procedures will be implemented in an exercise or will be demonstrated in an exercise. And it documents any deviations from what the plan would call for in terms of being implemented.

Some people chose to call these limitations. But

the Extent of Play describes in so many words how an organization says they are going to demonstrate that exercise objective.

Q Can we use an example, because I do think the word "limitation" may be appropriate in certain instances. Let's go back to your reference to page 200 of the Exhibit 43F.

On page 200 you referred us to the, I believe the remaining issue that FEMA was not satisfied with the State of New Hampshire's response to Mr. Thomas' letter. The remaining issue being New Hampshire's arrangements for 24-hour continuous operation at the staging area and the reception center.

Have you found that on page 200?

A (Donovan) Yes, I have.

Q And a few minutes earlier today you made reference to the Extent of Play agreement. I take it with regard to this 24-hour continuous operation objective.

A (Donovan) That's correct.

Q Now we are talking about Objective No. 34, are we not?

A (Donovan) That's correct.

Q So if you would just turn back one page to page 198, and again just so the record is clear, this portion of the report is the portion where you are setting forth your evaluation of the State of New Hampshire's performance,

correct?

A (Donovan) That's correct.

Q On page 198 we have Objective No. 34 set forth. Then we have evaluation. The word there is "met". And then there is a narrative summary.

Can you detail for me the relationship between the Extent of Play as to the 24-hour continuous operation and how the Extent of Play impacted on Objective No. 34 for the State of New Hampshire?

A (Donovan) Okay. The specific reference in the Extent of Play documents is -- this document was also prepared in three sections: One for New Hampshire, one for New Hampshire Yankee offsite response organization, and one for the State of Maine.

Q This document being?

A (Donovan) The Extent of Play, Attachment A.

Q Attachment A. Okay.

A (Donovan) And if you turn to the section sheet, they have got numbers on the top. 336, which has a page number on the bottom being 3.3-22-ER.

I will also point out while you are finding the page, in my prefiled testimony we pointed out to the Board that the exercise objectives should be read with the Extent of Play to get the full context of our evaluation. And I am trying to respond to your question once everyone gets to the

same page.

Q Yes. At the very bottom, it's a little confusing. It says 3.3-22-ER.

A (Donovan) 3.3-22-ER.

Q Yes.

Mr. Donovan, just that last phrase that you stated that you must read the exercise objectives in combination with the Extent of Play. That's really what I would like you to focus on.

If you could explain what the relationship between those two things is.

A (Donovan) Well, in response to your previous question, I tried to give you a working definition of what an Extent of Play is.

Q Yes.

A (Donovan) It's an agreement between FEMA and the exercise participants how they are going to demonstrate certain parts of their plan which, in turn, are related to our exercise objectives.

This particular objective Mr. Traficonte is asking me questions on is Objective 34, which deals with continuous 24-hour staffing, and this particular objective is demonstrated with a shift change.

And this Extent of Play agreement for the State of New Hampshire, this particular one. There is others that

has some reference, but this one has the most references. Notice on the top it has the applicable objectives. It has Objective 2 and Objective 34. Objective 2 being the normal staffing objective.

And it says the NHRERP local and host community EOCs, and it says resources to be evaluated, total resources required, and then it goes into an Extent of Play, and it goes into a summary.

And in this summary statement, towards the bottom it talks about shift turnover for the local EOC. And it says here that shift turnover for 17 of -- for 11 of the 17 of the local EOCs will demonstrate the capability to provide 24-hour coverage of EOC responsibilities. Sheriff's deputies are not required to do a shift turnover.

And there are other Extent of Plays that apply to this objective. But in terms of an illustrative example, this is one way that you would look at this.

So if you looked at this Extent of Play, and you looked at our exercise evaluation of Objective 34, we would say in this particular case that the sheriff's deputies at the five nonparticipating local staging area would not do a shift turnover.

Q At the risk of belaboring it, let me take -- and I do understand what your answer is. Let me probe a little bit further.

Again look at page 198. The objective is to demonstrate the ability to maintain staffing on a continuous 24-hour basis by an actual shift change.

That's the objective that the exercise is to demonstrate, correct?

A (Donovan) Right.

Q That would include demonstrating the capacity to have 24-hour staff at both the staging area and the reception centers, correct?

A (Donovan) No.

Q In the normal course, so to speak.

A (Donovan) If there was not an Extent of Play that said otherwise.

Q Fine. That's exactly what I want to press on.

If there wasn't an Extent of Play that said otherwise, would that objective include or require a demonstration of a 24-hour staff for the staging area and the reception centers.

A (Donovan) If the plan called for it which is the other proviso we hadn't discussed.

Q All right. As a matter of fact, the New Hampshire plan does call for 24-hour staffing at the staging area and reception centers, does it not?

A (Donovan) At this time, it does. At the time of the exercise, it did not.

Q Now, we are going to move back one step.

And if a plan did not provide for 24-hour staffing at a staging area and at reception centers, would FEMA have found such a plan adequate?

A (Donovan) We required them to have the capability. So the answer in reverse is that we would have not found the plan adequate in that area.

Q Right.

So if we can just take it in stages.

I take your point that the plan at the time of the exercise did not provide for 24-hour staffing at those two locations.

But if we move forward, as FEMA informs the State of New Hampshire that that's not going to be adequate, that they need to so provide. And that the plan is then amended to provide such 24-hour continuous staffing.

The next thing we hit is the exercise objective No. 34 which would require at an exercise of that plan that they demonstrate that capacity; correct?

A (Donovan) No, you made a wrong assumption.

I answered your earlier question that we responded to the state that for the purposes of this exercise, the June '88 exercise, they did not have to change their plan to address the staffing at these two areas on a 24-hour basis.

Q For the purposes of this exercise they did not

have to change their plan?

A (Donovan) Right.

But I pointed out, too, in my exercise report where we said that if we wanted a plan change in the future to do so. And since the publishment of this exercise report they have responded to that issue and they have amended their plan to call for staffing of these two facilities on a 24-hour -- or these facilities, there is more than two, on a 24-hour basis.

Q What was the basis for permitting the State of New Hampshire -- let me withdraw that. Why did FEMA take the position that it wasn't necessary for the State of New Hampshire to demonstrate 24-hour staffing at the staging areas and reception centers in New Hampshire?

A (Donovan) I don't understand your question. Would you put it --

Q Yes, let me try it again.

If I understood the answer to the last question, why did FEMA decide that the state did not have to demonstrate during the June 1988 exercise 24-hour staffing capability at the staging area and reception centers?

A (Donovan) Because their plan at that time didn't call for it.

Q Fine. Let's hold that constant.

But I also asked you the question, whether a plan

that did not so provide could be found adequate; and I believe the answer was it would not have been found adequate, correct?

A (Donovan) That's correct.

Q So essentially, that's an unstable foundation.

It's true the plan did not call for it, but the plan was going to have to be amended and FEMA knew that and the State of New Hampshire was on notice of that; correct?

A (Donovan) That's correct.

Q Then I'll put the question again.

Why wouldn't you have required or suggested to the State of New Hampshire that it demonstrate its 24-hour staffing capacity at the June '88 exercise?

A (Donovan) Because in this time frame and context it was unreasonable to suggest that they change their plan and acquire the staff to demonstrate that.

Q Is the answer because there was a compression of time here? That the amount of time available to the State of New Hampshire to make that change, bring the staff up -- to staff up to that point was not sufficient to permit that to take place prior to the June 1988 exercise?

A (Donovan) Well, that was part of my answer.

Q Okay.

A (Donovan) You interrupted me before I finished --

Q I'm sorry.

A (Donovan) -- the rest of my answer.

The other aspect was, at that time -- this time frame, spring of 1988, the agency had not made its position known on this subject to the State of New Hampshire. The 24-hour staffing.

Q Okay.

A (Donovan) At these response facilities, if we can use that term.

Q You say the agency had not made its position known.

Does Mass AG Exhibit 94, Mr. Thomas' letter, does that letter make the agency's position known?

A (Donovan) At that time, yes.

Q Oh, I see.

So it's that letter that makes the position known?

A (Donovan) Right.

Q Okay.

Subsequent to the date of that letter, which I believe was March 31 of '88, the State of New Hampshire is on notice as to what FEMA is requiring with regard to 24-hour staffing.

Is it your position or is it your testimony that the reason why the state is not going to be required to demonstrate that capacity in the June exercise is because

the time between March 31 and June 28 is simply not adequate for the state to get adequate staffing in that regard?

A (Donovan) No.

Q Is there another part of the explanation?

A (Donovan) Yes.

Q That's part of the explanation?

A (Donovan) Yes.

Q Is there another part of the explanation?

A (Donovan) Yes, there is.

Q Okay.

A (Donovan) I was trying to give you that explanation.

The state in their response told us the mechanisms they would use for 24-hour staffing at these two -- or these multiple response facilities. And some of that was demonstrated. The process of producing the shift change was demonstrated in the exercise.

In some cases the process of producing the shift change was not done with the actual replacement of persons, but they documented the process that they would go through, both for the staging area and for the reception centers.

Q Maybe I mishear or I don't understand that answer.

Is the thrust of that answer that, in fact, they were able to staff up in this additional way?

A (Donovan) I said, they documented the process

that they would use.

Q To do so?

A (Donovan) To do so. But they didn't physically demonstrate a physical shift change.

Q And why wasn't that something that you would have required pursuant to exercise objective 34?

A (Donovan) We looked at the issue and we looked at their response and we agreed in the Extent of Play on the mechanisms that would be used to document the process for effecting a shift change; and that's what I was trying to draw your attention to as an example. I didn't choose this particular facility, but as an example.

Q I understand.

Now using this as an example, this discussion we just had about objective No. 34 for the State of New Hampshire, using it as an example, do you believe it's a fair characterization to say that the Extent of Play agreement that runs to this 24-hour staffing issue, essentially, is a limitation on what must be demonstrated by the response organization to meet a particular objective?

A (Donovan) It's a documentation of what they will do to demonstrate --

Q It is certainly that --

A (Donovan) -- that particular response.

Q I'm sorry, I didn't mean to interrupt you.

It is certainly --

A (Donovan) And in doing so we've agreed that that is an acceptable documentation of the manner in which it will be demonstrated.

Q That's a fine answer.

I'm going after something slightly different.

It is a documentation of what will be demonstrated to meet the objective.

Is it, in addition, an agreement that FEMA signs on to that essentially functions as a limitation on what needs to be demonstrated to meet a particular objective?

JUDGE SMITH: You have used the word "limitations" several times now; he has never accepted it.

MR. TRAFICONTE: He offered --

JUDGE SMITH: Can it be a reduction?

MR. TRAFICONTE: He offered it initially, in fact.

JUDGE SMITH: Oh, he did?

MR. TRAFICONTE: He offered the words, some people say it's a "limitation". And I wanted to press on that because at another point I said, yes, I think of it as a limitation.

JUDGE SMITH: What's wrong with the word "limitation" in that context?

THE WITNESS: (Donovan) Well, I don't have any real problems with it. I normally don't use it. As he

quoted my answer correctly, I said some people refer to it as an limitation. I refer to it as documentation on how they will demonstrate it.

BY MR. TRAFICONTE:

Q Let me, I guess "telegraph" is the word of the day. Let me telegraph --

JUDGE SMITH: Would you let him do it next biennial, that way.

THE WITNESS: (Donovan) We would ask them to do it by a different way at the next exercise.

JUDGE SMITH: For example, by actually doing it?

THE WITNESS: (Donovan) Yes.

In this particular case, since he has talked about the reception centers, I didn't draw your attention to that particular Extent of Play. Reception centers of which in the plan are four host communities. They have sufficient staffing for all but the supervisory positions. The supervisory positions to supervise the monitoring efforts come from the State Public Health agency. And their plan says that they would go to the New England Compact, which is an agreement between the New England States to bring in people to supervise the functions for the second shift.

In the Extent of Play we said that you could document this process at an appropriate time by calling time out and explaining to FEMA's evaluators and briefing a

neutral party such as an exercise controller in a fashion you would use to brief them to take over your responsibilities as a supervisor.

But it wasn't necessary to call the State of Vermont and actually have the State of Vermont move people into the State of New Hampshire to physically arrive at these two reception centers to demonstrate their shift change.

And we said, describe to us the process and how you go about doing that. Since that time the state in updating their status of corrective actions to us they pointed out that not only did they consider their contract with the New England Compact, it would be one mechanism. But they have since identified a group of individuals that they have trained to provide the second shift supervisory element at the reception centers.

And so in response to your question, Judge, I would at the next exercise say, now I want to see these second shift people come in and document their demonstration of their ability to supervise this effort.

JUDGE McCOLLOM: I'm reading into what you said over the last 15 o r 20 minutes that this, rather than being a limitation, is FEMA's judgment as what is sufficient under this set of conditions to demonstrate that it is satisfactory.

THE WITNESS: (Donovan) Yes. I would agree with that.

MR. TRAFICONTE: If I could just have 30 seconds. I have a document that I have copies of and I'm not sure I need to distribute it. It may be part of Attachment A.

(Pause to review document.)

BY MR. TRAFICONTE:

Q Mr. Donovan, there is a relationship, is there not, between the Extent of Play agreements and the scope of a particular exercise?

A (Donovan) I would not normally refer to it that way. You had started off asking me a series of questions of how we got to the scenario and I was trying to describe that process in response to your question.

I would define the scope of the exercise to mean the number of exercise objectives to be demonstrated in the exercise.

Then we define Extent of Play which is our discussions, judgments, and agreements on how those should be demonstrated.

Then the next step is we develop scenarios. And within scenarios we have mini-scenarios that create opportunities for these response functions, exercise objectives, and Extent of Plays to be demonstrated.

Q Why don't we complete that line. You are

absolutely right, I had asked you to take us through that process.

You negotiated or parties negotiated Extent of Play agreements that delineated how the objectives were going to be demonstrated. And then scenarios are designed.

Can you describe for us in a little more detail how designs them and what we're talking about when we're talking about scenarios?

A (Donovan) I believe the Applicant made an exhibit of the scenario of the exercise.

Q I don't believe the Applicant has made the scenario an exhibit.

If it has, I stand corrected.

MR. DIGNAN: No, wait a minute, let it be clear. We have prefiled the scenario with a number on it. It has not been admitted into evidence.

That's why I was asking you at the start whether you wanted to do that formally now or not. And you said, no, you only wanted the Extent of Play.

MR. TRAFICONTE: I may have been proven wrong for the second time today.

Is that an exhibit number?

MR. DIGNAN: It's a record, isn't it, twice in one day?

MR. TRAFICONTE: One would have been a record.

(Laughter)

MR. DIGNAN: It was prefiled as Applicants' Exhibit 61.

We do not have the three copies in the courtroom, but if Mr. Traficonte wants it admitted now it's fine with me. We will have them down here tomorrow. It's a pretty extensive document. We distributed it.

You have a copy of it.

MR. TRAFICONTE: Yes.

MR. DIGNAN: What's your pleasure?

MR. TRAFICONTE: Why don't we defer it. I now realize it's the seven-volume or multi-volume document which there could just be an objection in getting that admitted from sheer weight, if for no other reason.

I want to think about whether we need that in evidence.

MR. DIGNAN: Well, I'll offer it. Do you want to object to it?

MR. TRAFICONTE: Do you want to offer it?

MR. DIGNAN: I'll offer it right now.

Do you want to object?

MR. TRAFICONTE: I don't want to object to the scenario, no.

MR. DIGNAN: I offer Exhibit 61 then with the representation that three copies will be furnished to the

court reporter in due course tomorrow.

Hearing no objection?

MR. TRAFICONTE: Hearing no objection.

(Laughter)

JUDGE SMITH: Will you describe it?

MR. DIGNAN: The best way to describe it, Your Honor, as I understand it's a seven-volume document and constitutes the scenario of the graded exercise held in June of 1988 with respect to the Seabrook Station.

Joe, would you add anything to that?

MR. FLYNN: Yes.

The Board's question suggests that it may not be familiar with the function of a scenario in an exercise.

JUDGE SMITH: No, I'm just filling out my form.

MR. DIGNAN: No. He just wants something to put in his book.

MR. FLYNN: Oh.

JUDGE SMITH: It's not quite that deep.

(Laughter)

JUDGE SMITH: Are there any objections?

(No response)

JUDGE SMITH: Received.

(The document referred previously marked for identification as Applicants' exhibit 61, was received into evidence.)

BY MR. TRAFICONTE:

Q Mr. Donovan, Attachment A is part of the scenario, as Mr. Dignan has used it loosely to describe these multi-volumes?

A (Donovan) Yes, it's part of Volume 1.

As you would expect, you asked a question do you want me to proceed and reply to your question of who produces the scenario and what it has done or do you want to stop and --

Q The first thing I would like you to do is, I would actually like you to describe, when we're using this word "scenario" what are we actually talking about? Because as I just indicated your Attachment A, which is the Extent of Play agreements is part of the scenario documents; and I would like to have a little bit more tightness on the use of the word "scenario."

What exactly is the "scenario?"

A (Donovan) The scenario is many things. First of all, it's the objectives. They're usually contained in the

scenario.

And we have the Extent of Play agreements, documentation.

We have exercise ground rules on who controls the exercise and who has rights as observers and evaluators. And conditions such as if there is a real emergency we're going to call the exercise to a halt, so that people could respond to a real emergency.

And when you get through these factors, then the scenario becomes a set of initiating conditions and mini-scenarios, which I will describe in a minute.

Initiating conditions are both -- can be both onsite and offsite. Now we look at a REP, Radiological Emergency Preparedness exercise, of course, is evaluated by two agencies: the Nuclear Regulatory Commission evaluates the onsite activities.

So the Nuclear Regulatory Commission has certain objectives that it wants to see or certain functions it wants to see the onsite response organization demonstrate. So there are initiating events for plant issues. If a licensee has a simulator; a lot of times the simulator becomes the scene of the exercise control room and they use the computers to drive the simulator to run the onsite exercise initiating conditions.

We have also offsite initiating conditions for

mini-scenarios such as an imaginary traffic impediment or an imaginary request for certain things.

So in building the scenario it then becomes a set of onsite initiating events. And in the case of almost every exercise activity we always have a section of the scenario that deals with the weather. Meteorological conditions for the period of the exercise.

We have a set of offsite conditions, if they're appropriate, for mini-scenarios to see certain things demonstrated.

We have, in this particular case, at least in the exercises I'm involved in, we have control cells established and programs with the control cells to execute. In this case, the control cells run and administered by the New Hampshire Yankee organization. It represented many things to different people. It represented emergency resource providers at times. At times it represented the public in terms of calling into the room or control section, both the State of Maine and joint telephone information that's jointly between New Hampshire, New Hampshire Yankee, and New Hampshire Yankee Onsite Response Organization.

It also contained data, what I'll call radiological data, both onsite in terms of plant parameters, stake readings, primary coolant sample analysis.

It also contains offsite data where we had a plume

release. We had a plume release in this particular exercise. And it had what happened to that plume release over a period of time so that the field teams and the controllers with the field teams could give the field teams responsive indications for reading on their instruments or readings that they would take as a result of taking air samples or other samples.

This exercise involved -- hopefully by name is a common term the "MS-1 hospitals." So we had mini-scenarios for the MS-1 hospitals. This would involve the ingestion pathway and re-entry and recovery portions of the exercise.

We had something that you and I agreed to call "time jump." Do you remember the phrase?

Q Yes, I do.

A (Donovan) We had break messages.

We stopped the exercise in the evening of June 28th. Portion of the players kept playing, but we gave them some hours. We moved up the play for them for a couple of hours to have them devise an ingestion pathway sampling plan for the field teams to go out and gather ingestion samples.

A (Donovan) The next day, the State of Maine, the State of New Hampshire and New Hampshire Yankee Offsite Response Organization were all given a break message as though an imaginary shift that worked during the night, and they were now returning to work that morning. And so they have a break message to allow for the jump in time, and the exercise proceeded for five to seven hours, depending on the location.

Maine got done faster than our other two organizations with that particular phase of the exercise since Maine was not impacted by a recovery/reentry issue as severe as the other two, but they also played a recovery and reentry to a degree.

And we then broke into a third time jump and the third set of conditions. In that case, we moved five days. Instead of moving 12 hours, we moved five days. So we had a new set of radiological data, a new set of assessments.

We had mini-scenarios for the laboratories. We tested the laboratories in Maine and the laboratory in New Hampshire and the laboratory designated by the SPMC plans. So we had samples taken to the labs, and we had mini-scenarios in the labs where these samples were analyzed. And we had results of these samples.

I could go on, but maybe that's given you an idea of what a scenario involves and entails.

Q The description you have given us of the scenario and its parts, and in some cases you referred to them as mini-scenarios, in fact in Applicants' Exhibit 61, these are all written out, are they not, and described in the multi-volume document?

A (Donovan) Yes.

Q For example, let's just take as an example of a mini-scenario, a traffic accident mini-scenario. That is prepared and written out in some detail before the exercise even begins as part of the scenario proposal, is it not?

A (Donovan) That's correct.

Q As are some of the other items: the laboratory test, the meteorological information, the time jump that at some point you instruct certain players. They are to imagine that time has gone forward a certain number of hours.

This whole arrangement is done beforehand, correct?

A (Donovan) That's correct.

And as I explained, there was also ground rules and the scenario defines a controller organization. And the controller organization that introduced mini-scenarios, or introduced data when data was called for to be introduced.

Q I'm going to come back to that in a moment. Let me just for the record, this is in major part for the

benefit of the Board.

JUDGE SMITH: Let me ask a question then.

MR. TRAFICONTE: I don't believe I'm wasting time. But I believe that it's helpful --

JUDGE SMITH: No, it's helpful.

MR. TRAFICONTE: -- to get an overview of the process here, because there is a fair amount of complexity. There is certainly an enormous amount of documentation. And I think it's helpful to have him, because he's very knowledgeable about its structure, lay it out.

JUDGE SMITH: Right.

MR. TRAFICONTE: That is really part of the design here.

JUDGE SMITH: But there is a question I would ask: where does the term "scope of exercise" fit into your description of it, in the number of objectives and the play agreement?

THE WITNESS: (Donovan) Okay. When we agreed upon using the word "scope" to cover the number of objectives and then the Extent of Play, in some cases, for example, a number of transportation routes.

JUDGE SMITH: But I thought I had heard you say earlier that scope was a reference to the objectives that will be exercised.

THE WITNESS: (Donovan) Right.

JUDGE SMITH: The number of objectives.

THE WITNESS: (Donovan) Right.

JUDGE SMITH: Are you familiar with the use of that term in the Nuclear Regulatory Commission's Appeal Board decision on that issue?

THE WITNESS: (Donovan) Not really, I guess. No.

JUDGE SMITH: I guess not.

THE WITNESS: (Donovan) But to try to answer your question if I understood the thrust of it.

When we agreed upon the exercise objectives and the Extent of Play, we then looked to see that the scenario provides opportunities for these things to be demonstrated. And the opportunities usually are broken down until we have to have some initiating event to create an opportunity.

And one thing I didn't mention but I think it's important. I started to describe that the Nuclear Regulatory Commission has some onsite concerns that they want to see tested in the exercise, and FEMA has offsite concerns. And sometimes they don't match perfectly. We strive to see that they match perfectly. If they don't match, we get some mini-scenarios running that may be related to the time sequence, maybe out-of-time sequence, but we could see certain things demonstrated as part of the exercise.

In addition, from my perspective we told the

scenario developers we wanted to see certain conditions occur in terms of changes between the initiating conditions and the ensuing conditions, because we wanted to see certain portions of the offsite plans demonstrated in terms of protective actions assessment and protective action decisionmaking.

In addition, for example, we told them what time to demonstrate the shift change. We didn't give them an option. There was an exercise controller message basically that said around 4:00 you have to demonstrate a shift change. And, of course, my evaluators were all aware of that. That where we were asking for shift changes or shift change process to be discussed and documented, that this was the period of time that we were going to have people perform a shift change.

And in this case the players, you know, this was not an initiating event; this was the controlling event. They, in so many words, were told that a certain part of the exercise you will not only plan for, you will actually produce a shift change, and you will produce a shift change in this time window.

And so we had other conditions. And as I was trying to describe, in some cases some of our mini-scenarios override or preclude other scenarios. And, of course, when FEMA evaluates the performance, we take all of these into

cognizance.

JUDGE SMITH: Excuse me. I have a question there.

You mentioned time jump, and I think I understand that. But do you time jump and do you do exercise in real time, or do you have a separate clock running for the exercise?

THE WITNESS: (Donovan) We exercise in real time. And when we have a time jump, we say now everyone move their clock four hours ahead, or 12 hours ahead, or five.

JUDGE SMITH: You start out in real time.

THE WITNESS: (Donovan) Right.

JUDGE SMITH: But then you get off that clock.

MR. FLYNN: Your Honor, I wanted to offer a comment. I think this may be helpful.

You have raised an issue of does the witness understand the scope of exercise issue, and he has been briefed. But I think it's also fair to say that he may be using the term in a somewhat different sense than it's understood by the other people here.

In fact, there were two distinct senses in which the term "scope of exercise" is used. One of which Mr. Donovan has described. And that is, are all of the objectives, the NUREG-0654 objectives, which may be reasonably demonstrated in an exercise, tested. That's the sense in which Mr. Donovan has used the term.

There is another sense, and that is, given the objectives, what will it take to demonstrate that they can be met successfully. And that's addressed by the Extent of Play.

Now, you could also talk about the Extent of Play document as addressing scope of the exercise issue.

JUDGE SMITH: I was referring to the Appeal Board's decision on 901 in the Shoreham case.

MR. FLYNN: Yes.

JUDGE SMITH: And I think there they were talking about Extent of Play

MR. FLYNN: Yes.

JUDGE SMITH: Well, actually exclusively. I just was hoping that the difference in the term, just as you are doing, would be made clear.

MR. FLYNN: Yes, and Mr. Donovan is aware of the differences in those two sets of issues.

MR. TRAFICONTE: I'm going to come back to scope. In any event, I have a portion of my cross that is aimed at the scope in the Appeal Board sense of the use of the phrase "scope".

BY MR. TRAFICONTE:

Q Let me just again, for the sake of clarity, come back to some words you used in some things you describe.

You made reference to a control cell. In everyday

layman's language, it's a fair statement, is it not, that you are talking about a simulated -- you are talking about a group of people who are at a phone bank who simulate or play various roles during the exercise, right?

MR. DIGNAN: Who was that?

MR. TRAFICONTE: The control, we're talking about control cells.

BY MR. TRAFICONTE:

Q So, for example, during this particular exercise there was a New Hampshire Yankee control cell and there was a FEMA control cell. FEMA control cell, that was a group of people who played the governor and state officials. The New Hampshire Yankee control cell was a group of people that at different times played day care centers, schools and other entities and individuals, right?

A (Donovan) That is correct. When I described the scenario that was presented to me to review, I described the fact that that scenario contained the NHY control cell and NHY instructions for that control cell.

And now that you have brought the distinction up, I would like to inform the Board that there was a FEMA control cell, as Mr. Traficonte just stated. But the FEMA control cell's plan is not found in this scenario. And the FEMA control cell reported to me, and they didn't report to the NHY control organization.

Q It was the language, it was just the language I was trying to clarify.

When you use the phrase "control cell", and the fact that these multi-volume scenario documents contain a description of the control cell, what we are really talking about is that it's a script, more or less, for a group of people who are going to simulate various roles at different times during the exercise. And in some ways it's prescripted loosely. It's loosely prescripted for these people, because it's part of how various functions are going to get demonstrated, or at least, hopefully demonstrated during an exercise.

A (Donovan) There is two separate aspects. There was a control cell. And the control cell represented, as you described, different people or different roles. And they perform telephone communications to or responded to telephone communications to them. And in that case, these people may have been the wearers of many different hats.

In addition, there were controllers. And the controllers, for example, in the example I used went with a radiological monitoring field team. The controller had information that's found in the scenario package dealing with the plume or plume deposition if we're dealing with the ingestion pathway portion of the exercise. And the controller had that information.

But in this case the controller was physically located with the players, and it's different. And we also had controllers, for example, at some of the -- at the New Hampshire staging area. So when the vehicles were dispatched, they were dispatched in accordance with the routes as described in the Extent of Play document.

Q That was going to be my next question.

A (Donovan) So I wanted to draw your -- you know, when I describe it, I describe the fact that there was a control cell and controllers. And your question was just back on the control cells.

Q No, that's fine, because my next question was going to be your use of the phrase "controller".

Can you give us a scorecard as to who was playing at the time?

There were participants or players. There were evaluators. There were observers. And there were controllers.

Can you describe -- what do the controllers during the exercise, what do they actually do?

A (Donovan) They could do several things, and if we had the scenario here, we could go to the exercise ground rules which I don't have a copy with me. But it would describe the duties of a controller and the responsibilities, and the duties and responsibilities of an

evaluator, an observer, et cetera.

Well, let's get back to the base route.

The participants respond. In some cases, they will respond and there may be no controllers at their point of response, and there may be controllers. In most cases, there usually are evaluators. In this case, if it's offsite, it's FEMA evaluators. If it's onsite, it would be NRC evaluators.

One of the functions of the controller is to, as I said, interject initiating data. So if at that location initiating events have to be interjected, he would interject that. But he also has an overburden responsibility to make sure that people's safety is taken care of. And if people -- he could call a time out, in other words. He has the authority to call a time out in the exercise play.

The senior exercise controller has the authority to call time out. An individual controller at an individual location, if something happened, as it did twice at one of the reception centers, for example, where the fire department responded to an actual fire, the controller said, you know, time out. This exercise play stops. These people are going to go off and fight a real fire. When they come back and get set up, it's time in again. So that's one of the roles the controller can play.

And, for example, at the reception centers the

controllers place in some cases radioactive sources, Coleman mantle lanterns on certain individuals, and at other times controllers would give monitors the readings of contamination or deposition that they might find on persons.

In other cases, the controller might not do anything. He's there just to monitor the flow of the exercise and report back to the controller organization that they are dealing with this issue at this time.

And the purpose of the controller organization in its total is again to provide initiating events when required, to monitor the flow and sometimes we have to make midstream corrections. And if we have to make midstream corrections, then, instead of following a script, the controller would be advised to proceed with whatever his instructions were at that, or her instructions were at that time.

And there was, I forget the number, but approximately 270 exercise controllers. So we're talking about a significant organization and a management structure to supervise and coordinate the efforts of the control organization.

Q I want to highlight the relationship between the scenario documents that you have described that are created, I want to try to highlight how they are actually used during the exercise.

I think your phrase was the controller "inject" initiating conditions when appropriate.

It's a fair statement, isn't it, that the controllers, depending on their location, have scenario information by design. They have that in advance. And at the appropriate time they hand off controller messages and other forms of information to the various players as an initiating condition for a response. And that this takes place over the course of the exercise. It doesn't just happen at the beginning. It happens throughout the exercise, right?

A (Donovan) Basically that's correct. I believe normally they don't hand off the statement. They normally verbally --

Q Verbally. Okay.

A (Donovan) For example, if you are a controller with a field team, and theoretically that field team entered a plume boundary, the controller would ideally say you're meter is starting to move and it's now reading this. And if the car goes another half a mile further, he would say your meter is now reading this.

Or he would walk up -- let's take an access control point as another example. He would walk up to an access control point or a traffic control point, and he would ask or he would tell a person -- he would standby that person, if they followed their procedure, pull out a pocket dosimeter -- when they followed their procedure, pulled out the pocket dosimeter to look at their exposure, he would say your meter now reads this.

In some cases, depending on the scope of our ability to get prepared for the exercise, we would actually hand him a pocket dosimeter and say don't read yours; read this one. This is now your pocket dosimeter. And maybe 15 minutes later he would give him a third pocket dosimeter.

So in most cases the goal of the controller is to make it as realistic as possible. So, you know, he's not handing scripts. In some cases, this does happen. If you have a weather report that comes in over a Fax, they would say here's the weather report that you just got Faxed from a weather station. But in most cases the data would be verbally transferred.

Q All right, that's helpful.

The controllers know what they are supposed to do because the scenario documents are created before the event, and they have access to them and they are knowledgeable about them, correct?

A (Donovan) They have access to their assignments. I don't know if they have access to the whole thing.

JUDGE SMITH: In this instance, it's probably worthwhile to make the distinction between verbally and orally communicating. And I think you have been referring all the time to orally.

THE WITNESS: (Donovan) Right.

Excuse me if I change words.

BY MR. TRAFICONTE:

Q The controllers, you said there were over 200 of these individuals, controllers?

A (Donovan) Yes.

Q Who are they? Who do they work for or where do they come from?

A (Donovan) It was a composite organization. I believe it consisted of representatives from the State of Maine, the State of New Hampshire, and the New Hampshire Yankee corporation.

Q So is it a fair statement to say that the controller organization, as you characterized it, is drawn personnel-wise from the same sources that the participants and players are drawn from?

A (Donovan) Normally that's the case.

Q Normally that is the case.

The evaluators are obviously FEMA or FEMA

contractors, are they not?

A (Donovan) The evaluators who reported to me. In some cases, other organizations have their own evaluators present as well. But for this particular exercise, I believe the evaluators that we will review in my discussions will be FEMA evaluators.

Q FEMA evaluators. And as you have noted --

MR. DIGNAN: Are you off controllers now? Have you moved on to evaluators?

MR. TRAFICONTE: I was just going to --

MR. DIGNAN: Because with your permission, if we are educating everybody, there was one point I wanted brought out about the controllers.

Would you mind?

MR. TRAFICONTE: It would be helpful.

MR. DIGNAN: The other thing, Mr. Donovan, the controllers serve, or another purpose they serve is they can override the effort of the participants if the effort has served to defeat the scenario, and force the scenario to continue.

I'm thinking particularly in the control room or some place like that. They can just tell people that another train or another safety system has failed in order to keep the accident moving if, in fact, steps have been taken to stop it; is that correct?

THE WITNESS: (Donovan) That's correct. They could also say that that's a good decision, but that didn't happen.

MR. DIGNAN: Okay.

THE WITNESS: (Donovan) They can reverse a decision, can reverse an action. They can cancel out.

MR. DIGNAN: And that is another one of their functions.

THE WITNESS: (Donovan) Right.

MR. DIGNAN: To be sure that the play goes on, if you will.

THE WITNESS: (Donovan) That's correct.

I used the term "monitor", but that's part of the monitoring process. I said they kind of steer it so if we saw people going down the wrong path, and if the net affect would be by going down a wrong path that they couldn't demonstrate a mini-scenario at some point in the future, then the controller would normally consult -- the control organization would consult with me, and we would say we're going to stop this activity and we are going to back them up.

JUDGE SMITH: Did this concept evolve from war games? Do you know?

THE WITNESS: (Donovan) My use of controllers and the interface between evaluators comes from my experience in

running exercises with the military. But I don't know where the overall concept came from. But I would expect a lot of things that we do in emergency preparedness came out of the World War II effort in real combat and in preparing people for combat. And I think war games are part of that effort.

BY MR. TRAFICONTE:

Q Where I think I was, we were talking about the evaluators. FEMA, of course, had a large number of evaluators for offsite purposes.

It was over 150, was it not?

A (Donovan) Yes, it was.

Q So we have over 200 controllers. We have over 150 evaluators from FEMA. And I think you have noted twice that the NRC is, of course, evaluating the onsite performance, and it has evaluators present as well, correct?

A (Donovan) That's correct.

Q And do you have a rough number for NRC evaluators?

A (Donovan) No, I don't.

Q All right. Now there are also the people whose performance is being observed, and they are the players, right?

A (Donovan) Yes.

Q They are the ones about whom the whole thing is really -- it's really all designed to show what they do, when they do it, how they do it, right?

A (Donovan) Yes.

Q That's what the whole operation is about.

How many players actually participated in this exercise?

A (Donovan) I believe in excess of 1500 between the two states and the offsite response organization.

Q Can you subtract the players that are from Maine or connected to Maine?

Do you know roughly how many that would be?

A (Donovan) I believe it was approximately 50 people.

Q So we really have upwards of 1500 players for New Hampshire and Massachusetts. That's the scope of -- that may not be a good word to use.

That's the extent of what we're talking about. We have a lot of people doing a lot of things.

A (Donovan) That was the extent of participation by persons representing those two offsite response organizations.

JUDGE SMITH: Those are the persons that are involved in the plume exposure pathway EPZ and onsite?

THE WITNESS: (Donovan) Yes. A lesser number was involved when we moved to the ingestion and reentry portions of the exercise.

JUDGE SMITH: In New Hampshire and Massachusetts

too?

THE WITNESS: (Donovan) Yes.

BY MR. TRAFICONTE:

Q Now I think that's helpful as an overview.

The scenario as you've described it, and again I'll use it in the way you have dofined it loosely, it has all these pieces.

Who authored the scenario for this exercise?

A (Donovan) The offsite response organizations. These were the State of Maine, the State of New Hampshire, New Hampshire Yankee.

Offsite response organization, from FEMA's perspective, and the onsite was offered by New Hampshire Yankee.

Q And submitted to FEMA and you --

A (Donovan) And NRC.

Q And NRC.

And was it signed off on, in some sense, or approved in some sense?

A (Donovan) Each of the two agencies does a review and does a concurrence. And in this process we talk to each other to ensure that if we, FEMA, want something changed that that change in order to be demonstrated doesn't create a problem for NRC's concern in terms of onsite.

In this review process FEMA does several things. We look at the initiating events for offsite. The mini-scenarios as I described are the one way of describing some of these initiating events. We look at the context of the interface.

We also look at the offsite radiological release. And we analyze the offsite radiological release using one of FEMA's contractors, and that gives us a benchmark, so to speak, to set the conditions for accident assessment and decision-making and implementation of decisions.

So we look at a lot of different things. And we reviewed the scenario over a period of several weeks. And we had several meetings to discuss some changes in components of the scenario.

Q It's accurate to say that you negotiated the

details of the scenario with the ORO and the State of New Hampshire, FEMA did?

A (Donovan) And the State of Maine, yes.

Q And the State of Maine.

A (Donovan) To answer your question I need to go back one more step.

There was an exercise control group. An exercise control group was all four organizations: New Hampshire Yankee speaking for the onsite; New Hampshire Yankee offsite response organization; The State of New Hampshire; and the State of Maine.

So persons were designated to be part of this exercise control group. They had the responsibility to set up the controller organization to meet and agree with FEMA on the Extent of Play, after the objectives were established and then to develop the scenario and all of its events to bring about conditions for the demonstration of those objectives.

And the exercise control group, when we met with it, always had representatives of all four organizations there. And in this case I think it's fair to say, at least from my perspective, that they were always a party, all four were a party to this process.

And if we got down to the specific nuances just dealing with offsite in one state, then even though there

might be multiple parties there, the person that was speaking for that state or that organization was the person that we discussed these items with and our concerns.

Q All right.

I want to ask you a series of questions about the structure, if you will, or the management structure for the evaluators that you were in charge of.

But before I do that, I actually want to come back to one point about the readiness, if you will, of the SPMC for an exercise in June of 1988.

Mr. Donovan, the staging area that was used during the exercise is not the staging area that is in the plan of record; correct?

A (Donovan) That's correct.

And our exercise report so notes.

Q Now I'll put it to you directly.

Is the fact that the staging area that was used -- is the fact that it is not the one of record, in your opinion, is that a reason for perhaps postponing an exercise or deferring an exercise until the staging area on which the plan relies could be used?

A (Donovan) No, it was not a reason.

Q It is not a reason?

A (Donovan) I took a position that it was not a reason.

Q All right.

It's a fact, isn't it, that the staging area is part of a network of communications, for example, and physical movement. The staging area is part of the network in an emergency plan that is a fairly complex one.

And that using an alternate site that isn't part of the plan could impact on how well you test that network.

Isn't that a fair statement?

MR. DIGNAN: Objection. The question is compound.

I want an answer to the first question which is, whether that network is all that complex. And then the second question.

MR. TRAFICONTE: All right.

That's fine.

BY MR. TRAFICONTE:

Q The staging area is part of a fairly complex network, is it not?

A (Donovan) I wouldn't consider it complex.

The SPMC defines four facilities of significance. It defines the NHY ORO EOC; and in conjunction with that, that's one facility.

There's a media center and a joint telephone information center. The joint telephone information center happens to be located on the compound site where the EOC is located.

The media center is located a few miles away.

The third set of facilities, I'll call them set of facilities, are the reception centers. There are two: Andover and Beverly.

And the fourth is the staging area. For the exercise it was discussed that we wanted the staging area alternate -- I don't use the words "alternate." It was identified to me it would be a training location until the zoning issues could be resolved at Haverhill, if I pronounce the words correctly.

So I said I wanted to see the setup replicated. Not duplicated, but replicated. The same number of telephones. The same assets that would be handed out for the employees that would be deployed.

And if you look in the Extent of Play, in many cases we made them go from the training site, the Salem, New Hampshire staging area to the designated plan staging area before they ran most of their functions.

So we addressed that. And I was satisfied that it was not an impediment to the exercise. And that all of the functions that would have been demonstrated had it been at the site designated in the plan were all demonstrated at the training site. And that there was -- all the communication systems were replicated. And the physical layouts were there in similar fashion. As I said, it was not duplicated,

so it was not an identical setup. But it was similar to the other setup.

And all of the functions could be demonstrated, so there was no comprise in what they could demonstrate.

Q Well that's really the heart of it, isn't it?

In your view, there was no compromise in what could be demonstrated by using a substitute site?

A (Donovan) The net effect which we discuss in our Extent of Play by using an alternate site, that the deployment time of the people from the staging area to their field assignments was longer because the physical distan was greater from the exercise staging area versus the staging area identified in the plan.

Q Now just as a matter of historical fact.

The plans for the scenario, and I believe, the Extent of Play were already drafted when it became known that the staging area in Haverhill was not going to be available.

That's a fact, is it not?

A (Donovan) I can't agree because my memory is not clear on this particular issue.

I would like to point out in roman numeral V of the exercise report, we have a footnote about the staging area. And we said in this footnote, we note that: "The officials of Haverhill, Massachusetts withdrew permission

for the use of the facility. It's only an ordinance issue; therefore, the physical attributes of the staging area structure as specified in the plan cannot be evaluated."

You're asking me to recall when this issue was brought to my attention. It seems to me it was brought to my attention before I was asked to review the scenario.

So I came to a decision at that time, as I just tried to explain to you in my earlier answer to your question, I said if the functions could be demonstrated and if you could replicate the physical attributes, that it would be satisfactory to use another site other than the one specified in the plan.

Q Just for the record, the injunction, I believe, or the zoning prohibition which was in existence for a fairly short period of time was in April of 1988. I don't know if that refreshes your memory or not.

Is there an Extent of Play agreement --

MR. DIGNAN: Well, wait a minute.

That's true, but the cease and desist order issued on February 26, 1988.

MR. TRAFICONTE: The cease and desist order issued in February of 1988?

MR. DIGNAN: According to your contention as you drafted it.

MR. TRAFICONTE: Then that's gospel truth.

(Laughter.)

MR. DIGNAN: I have no question about it.

BY MR. TRAFICONTE:

Q Mr. Donovan, is there an Extent of Play agreement with regard to the ORO in the Massachusetts exercise performance that touches on or concerns this substitute staging area?

A (Donovan) Well, the very first one, 321 on page 323 in the Extent of Play summary starts off with the sentence that, "The process of demonstrating notification and information exchange for special care facilities will be evaluated by FEMA in the Salem, New Hampshire staging area."

And it continues on.

Q Well, let me put the question a different way.

MR. DIGNAN: I'm going to object to this line. I know of no contention in this case in which the Commonwealth contended that the exercise was affected by the Haverhill situation. The Haverhill contention is JI Contention No. 53. It's a straight contention that it might not be available. It was a planning contention.

And I don't believe an exercise contention was raised with respect to Haverhill. I know of none. The 53 is clearly a straight planning contention that we might not have it available to us. But I know of no contention, Your Honor, that this affected the exercise.

So I object to this line of questioning as irrelevant.

JUDGE SMITH: Well, I thought you were going to object in the additional grounds that you need not exercise the participation of a local government where they have been identified as refusing to participate.

MR. DIGNAN: Well, the staging area of the exercise would, and candidly, Your Honor, would not involve exercising the local government. It would be exercising our people at our staging area under the SPMC.

The difficulty that arose in this --

JUDGE SMITH: The local government --

MR. DIGNAN: Having caused the problem.

JUDGE SMITH: Having blocked the participation. But you don't offer that as a --

MR. DIGNAN: Well, I do, but I'm not sure that that's an objection of this line. There is a contention in the case that the unavailability of the Haverhill staging area, it makes the SPMC deficient.

But my point here -- so that there is no doubt Haverhill is in the case to that extent. My point here is there is no contention that the fact that we had to utilize Salem, because of the then indicated unavailability of Haverhill, was a problem with the exercise. There was just no contention to that affect made. I've got the Haverhill contention in front of me.

It is confined to the fact that it may not be available to us, and it's part of the plan. And I object on that ground. It's not relevant to any contention before the Board, this line.

MR. TRAFICONTE: Well, my response is going to be anything but convincing and persuasive. But as a matter of fact, we filed an exercise contention, Mass Exercise Contention 20A. And if you have your -- off the record for a minute.

(Discussion off the record.)

MR. TRAFICONTE: On page 49 of the December

opinion the Board makes reference to MAG Exercise 20 which alleged that the exercise demonstrated ORO does not have adequate facilities. And (a) the Haverhill staging area, which is --

JUDGE SMITH: Wait a minute.

MR. TRAFICONTE: I'm sorry.

JUDGE SMITH: Let us catch up here.

MR. TRAFICONTE: All right.

JUDGE SMITH: You're talking now about a December 15th memorandum and order.

MR. TRAFICONTE: Your December 15 order, memorandum and order, on page 49.

(Pause.)

MR. TRAFICONTE: It's on page 49 where the contention is described.

And on the next page the Board, in fact, doesn't allow that contention and bases in part on the grounds that we're dealing with a government there that's not participating.

JUDGE MCCOLLOM: You are right. Yes.

MR. TRAFICONTE: I raised that. As I already indicated, I was a little puzzled myself as to why I think that's going to help in response to the objection.

(Laughter)

JUDGE SMITH: Maybe it's latent masochism.

(Laughter)

MR. TRAFICONTE: There must be something like that.

Let me give you a response to the objection. We have scope contentions that had been admitted, and I think it's a perfectly permissible line of cross of Mr. Donovan to challenge the structure essentially of the exercise, and we are going to do a lot of this. I think it's perfectly appropriate to push and probe on the Extent of Play, for example, as it shaped the exercise in light of the constraints presented by the situation.

I was pressing on the staging area and the fact that they didn't use the one in the plan along the same line. It's part of a -- I'm probing and I'm testing whether there was an adequate demonstration by the exercise of the capacities of the plan. That's all part of a challenge to the FEMA presumption that the exercise was an adequate exercise and does establish reasonable assurance.

There is no question that we, in addition, attempted to have admitted as a contention and basis the specific failure in this exercise to have tested the very staging area that the plan relies on. I mean I would be disingenuous if I didn't refer you to that.

So Mr. Dignan's -- I mean that's correct. That contention was raised and not admitted. But I don't think

that should curtail me from examining FEMA on the nature or the scope of the scenario and the Extent of Play as it dealt with the fact that the staging area was not used, that the specific staging are that it relied on was not used.

MR. DIGNAN: Your Honor, I'm quickly reviewing -- and I will take a challenge -- of the scope, contention and the exercise, and none of them mentioned Haverhill, and they all have specific stuff in them.

Your Exercise No. 2, MAG Exercise 2, you've got one basis in and it talks about capability to implement a timely evacuation of Mass EPZs to hospitals and all other special facilities was not tested.

I know of nothing -- I'm prepared to be corrected, Mr. Traficonte -- because, like yourself, I don't pretend to have instant recall of all these contentions and their bases. But I know of no contention and no bases where the question, whether it be scope or otherwise, was challenged and the basis of the exercise was run using the substitute for Haverhill.

All I know of is the one Haverhill contention, which I agree was a planning contention. And this line of inquiry is directed right at something that I can't see is relevant to any contention that the Board has admitted.

JUDGE SMITH: Go ahead.

MR. TRAFICONTE: No. That was adequate.

JUDGE SMITH: Mr. Traficonte, I had difficulty following your argument. Not the way you stated it, but because of my waning powers of concentration late this afternoon.

But I thought I understood you to say while it might be that there is no particular exercise contention which was accepted, which covers the scope of the exercise as it relates to the staging area in Haverhill, that your are challenging now FEMA's overall finding.

Well, haven't we had that argument many times in respect to the SPMC litigation? That even though FEMA may have made broader findings, that their findings are now being considered are necessary for us to consider only with respect to specific contentions accepted for litigation.

And to the extent that they make findings beyond contentions which have been accepted for litigation, they don't help or hurt the Applicants. They don't sweeten the pot for them nor do they hurt them. It's only the contentions that we are going to litigate.

I mean is your argument today any different than that, or do you just feel lucky?

(Laughter)

MR. TRAFICONTE: Oh, I can definitely eliminate it. I can eliminate the latter one.

(Laughter)

MR. DIGNAN: I've always said it's better to be lucky than good, Judge.

(Laughter)

MR. TRAFICONTE: Maybe I'm suffering from the same waning concentration.

This would not be a bad time to break.

(Laughter)

MR. DIGNAN: Can we get the ruling before the --

(Laughter)

JUDGE SMITH: I mean, if your argument is any different, now is the time to sharpen it and focus it.

MR. TRAFICONTE: I think the Board has touched on a fundamental point. I appreciate that there is a general finding of reasonable assurance that has been made by the agency. I understand that we are obviously being put in the position to rebut that as to the '88 exercise.

The '88 exercise is a very complex thing, and what the purpose of an hour and a half here has been is to try to demonstrate the design of the exercise itself. The way the scenario was written, the way the Extent of Plays were negotiated, exactly what was done, how much of the plan was actually tested and in what ways is all part of a cross-examination of FEMA as FEMA is almost, unlike I think the plan review, FEMA is really the key determinant of the exercise in terms of its design, in terms of its evaluation.

FEMA is in a position that we are not in certainly as observers.

And what I am trying to do in pressing on the staging area issue is part of a cross-examination challenging whether or not FEMA did appropriately test -- FEMA in combination with the Applicants, of course -- did appropriately test this plan. And I appreciate the point that, you know --

JUDGE SMITH: But what aspects of the plan are you --

MR. TRAFICONTE: Well, I appreciate that point, that this particular aspect I happen to be focusing on was something we tried to get into this case, into the exercise case and litigate, and we were not permitted to do that.

Frankly, it's the distinction between litigating that issue and trying to use that issue to impeach FEMA's -- I mean that's the distinction.

JUDGE SMITH: All right, that's your reason. You are using this line of questioning then, not with respect to any contention with respect to the staging area, but to show the methodological --

MR. TRAFICONTE: Yes.

JUDGE SMITH: -- infirmities of their whole approach which you would impute then to the contentions which were received.

MR. TRAFICONTE: Yes. It's precisely that.

Mr. Dignan's point is a good one, which is that, well, but there isn't a contention on that point. But I don't see what --

MR. DIGNAN: There is no general inadequacy of FEMA review contention admitted in this proceeding, I maintain. Every single exercise contention is confined to specific bases.

JUDGE SMITH: Well, that was my memory as we did it, and I don't think that any general FEMA inadequacy contention -- well, it could have been. It's possible that you could have alleged a general pervasive failure on the whole approach. But you didn't, and no such contention was alleged.

It is only if this is a fair representative example of an inadequacy in their Extent of Play methodology and approach as to which you could impute to admitted contention that we would entertain your argument.

MR. TRAFICONTE: I have no other way of -- that's precisely, exactly right.

JUDGE SMITH: But you are almost done with the subject matter.

MR. TRAFICONTE: I am.

JUDGE SMITH: And it seems to be subject matter-specific.

MR. TRAFICONTE: Except in this regard. My cross-examination is going to return to specific Extent of Play agreements, specific objectives in ways in which what actually was demonstrated or tested was limited by agreement in light of constraints. And this particular instance, the staging area issue, will be part of a series of challenges basically to the methodology FEMA --

JUDGE SMITH: And all of which add up to that they were sort of push-overs.

MR. TRAFICONTE: All of it adds up to -- yes, it would be our position and we would seek findings that FEMA, or that this exercise was not sufficient to test the capacities or ORO and their resources, and it doesn't provide the foundation for a reasonable assurance finding.

MR. FLYNN: May I be heard?

JUDGE SMITH: That doesn't help you. You are going to have to always go back and tie it to the contentions that you have received unless you think that you can show institutional incompetence which taints the contentions which were received. And as I say, so far all you have now is a specific -- you have nothing of a generic nature that I can see that extends over to specific contentions.

I think it's time to adjourn.

MR. TRAFICONTE: Prior to --

JUDGE SMITH: Because I'll tell you, I'm having trouble following your argument, Really I am.

MR. TRAFICONTE: Fine.

JUDGE SMITH: I know you are saying it correctly, but I'm having trouble following it.

MR. TRAFICONTE: That's fine.

JUDGE SMITH: And let's revisit it tomorrow.

MR. TRAFICONTE: We can pick up with it, because I don't have very many more questions in that line, but we certainly should have a decision on this, because I have other questions on cross that could prompt the same objection.

JUDGE SMITH: It would be a good idea to come up with the policy early on.

MR. FLYNN: Do I understand that we will pick up this argument tomorrow morning?

JUDGE SMITH: Yes.

MR. FLYNN: I would like to be heard but it doesn't have to be now.

JUDGE SMITH: I think that the Board has already indicated that we are not accepting the argument. But I am not confident that I have understood it thoroughly, and I would like to hear it stated again, plus responses, if any.

MS. DOUGHTY: Before we adjourn, I wanted to ask if SAPL could have a ruling on its motion for

reconsideration of the Board's ruling on the motion to compel FEMA exercise notes. We filed this on May 5th, and I know Mr. Backus is --

JUDGE SMITH: We didn't get a FEMA answer to that, did we?

We have before us a motion from FEMA to reconsider an earlier ruling --

MR. FLYNN: Motion from SAPL.

JUDGE SMITH: Motion from SAPL to reconsider our earlier ruling denying -- what was it that we denied?

MS. DOUGHTY: The production of the Murli and Siminon exercise notes.

JUDGE SMITH: Dated May 5th.

MR. FLYNN: That's an oversight on our part, Your Honor. At the time SAPL --

JUDGE SMITH: You can orally argue it.

MR. FLYNN: What I would like to do is to take another look at it. It may be that, in view of what we have volunteered to the Commonwealth of Massachusetts, that we ought to volunteer that as well.

JUDGE SMITH: Well, I picked it up. I saw what the basic subject matter was, and I put it aside pending your response. So we are not ready to rule.

MR. FLYNN: Well, at the time the motion was filed my thought was that it would be controlled by the ruling on

the dispute between the Commonwealth and FEMA. But that took an unanticipated turn when we agreed to give up the documents that we did.

I didn't go back and rethink our position on the SAPL motion.

JUDGE SMITH: Do you want to do that and then be prepared to either acquiescence in whole or part to the request, or resist it, whatever?

MR. FLYNN: Yes.

JUDGE SMITH: Anything further this evening?

(No response.)

JUDGE SMITH: Anything further?

MR. TRAFICONTE: Oh, I'm sorry.

No, no, we can break until tomorrow.

JUDGE SMITH: We are adjourned until 9:00 a.m.

(Whereupon, at 5:05 p.m., the hearing was recessed, to resume at 9:00 a.m., Thursday, May 18, 1989.)

Seacoast Anti-Pollution League's Cross Examination
Plan for Particular Populations Re: Contentions JI 46 And JI 55

Voir Dire: Sinclair as to Aidikoff Associates, what it is, and what expertise if any it has in the area of emergency planning.

1) Examine as to how leaving the choice to shelter or evacuate to special facility administrators provides reasonable assurance of adequate protection to the populations and the staff people in special facilities. Explore the extent to which certain actions that should be taken in the planning process are being left to be done as ad hoc actions at the time of the event requiring the protective actions (egs. dealing with questions about the suitability of structures for sheltering).

2) Explore the feasibility and logistics of, and personnel dedicated to, the task of monitoring special needs persons at the reception centers and the provisions at the MS-1 Hospitals for "further processing" (see Applicants' testimony at p. 53). Examine also as to the transport arrangements for individuals referred to medical facilities from the reception centers.

3) Examine as to the capabilities of MS-1 and host hospitals. Particularly examine the extent to which the Commission's Policy Statement on Emergency Planning Standard 10 CFR 50.47(b)(12) has been addressed and the requirements established therein met (see also the FEMA guidance).

CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

Name: Public Service Company of New Hampshire, et al.
(Seabrook Station, Units 1 and 2)

Docket No: 50-443-OL
50-444-OL
(On-site Emergency Planning)

Place: Boston, Massachusetts

Date: May 17, 1989

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken stenographically by me and, thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.

/S/ _____

(Signature typed): Donna L. Cook

Official Reporter

Heritage Reporting Corporation