



Federal Emergency Management Agency

Washington, D.C. 20472

SEP 26 1988

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

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

SUBJECT: Participation of the Red Cross in Offsite Planning
for the Seabrook Nuclear Power Station

The Seabrook Plan for Massachusetts Communities (SPMC) contains the attached September 10, 1987, letter of agreement between the American Red Cross (ARC), signed by the Vice President/General Manager of the Eastern Operations Headquarters, and Public Service of New Hampshire, New Hampshire Yankee Division, concerning the participation of the ARC in Seabrook offsite planning and preparedness. However, in conversations held in February 1988 with Federal Emergency Management Agency (FEMA) staff, Red Cross Southern New England staff indicated that the Red Cross is not presently participating in this planning process. Indeed, in the full-participation Seabrook exercise which took place on June 28 - 29, 1988, the Red Cross declined to participate in congregate care center functions in the Massachusetts portion of the Seabrook EPZ.

FEMA plans to issue a review of Amendment 6 of the SPMC by October 14, 1988, as you are aware. We do not plan to use the ARC position on Seabrook as the cause for any rating of inadequacy in the plan review, based on the Commission ruling CLI-87-05, related to the Shoreham licensing case, as interpreted in the May 11, 1988, from Edward J. Reis, NRC Deputy Assistant General Counsel, to William R. Cumming of the FEMA Office of General Counsel. The Commission ruling addressed the question of whether individual letters of agreement are required with the ARC in regard to providing aid under a radiological emergency plan. Mr. Reis' letter stated that "the Commission in Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), CLI-87-5, 25 NRC 884, 888 (1987), recognized that the American Red Cross charter from Congress and its national policy require that the American Red Cross provide aid in 'any radiological or natural disaster' whether or not there are letters of agreement with the American Red Cross in connection with a particular emergency plan."

It is the FEMA position that the above Commission ruling is applicable in the Seabrook case, for the SPMC. Please inform us as soon as possible whether the NRC also finds it acceptable to apply the above ruling in the review of the SPMC.

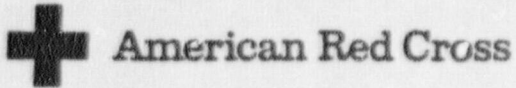
If you have any questions, please feel free to contact me at 646-2871.

Attachment
As Stated

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Eastern Operations Headquarters
615 North St. Asaph Street
Alexandria, VA 22314

September 10, 1987

Dear Mr. Brown,

I appreciated the opportunity to meet with you and members of your staff on Wednesday, September 2, 1987. Your review of the status of emergency planning for nuclear accidents in New Hampshire and Massachusetts was very helpful. The purpose of my letter is to reiterate the role the American Red Cross would play in the event of a nuclear accident at the New Hampshire Yankee nuclear power plant at Seabrook, New Hampshire.

As you know, it is the usual and preferred practice of the American Red Cross to actively participate with state and local government authorities in the development and testing of an emergency evacuation and relief plan that includes a specific Red Cross responsibility to provide mass care services for evacuees and disaster workers. Such participation in the planning process undertaken by responsible public authorities provides the best assurance that Red Cross resources will be used most effectively for the benefit of the individuals and communities in need.

With regard to the nuclear power plant at Seabrook, this practice has been followed with public authorities in New Hampshire. However, the public authorities in Massachusetts have not undertaken a planning process in which the Red Cross can participate. There should be no doubt that without the close coordination of Red Cross and government activities within the framework of a tested disaster response plan, Red Cross relief efforts will be negatively affected.

Nonetheless, the humanitarian mission of the American Red Cross requires that, in the event of a nuclear accident and evacuation, the Red Cross will provide mass care services to the extent of its abilities and will cooperate with public and private organizations, including New Hampshire Yankee, to meet the needs of evacuees and disaster workers.

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The programs of the American Red Cross are made possible
by the voluntary services and financial support
of the American People.

The basis for this commitment is found in the American Red Cross Board of Governors policy referred to in Disaster Services Regulations and Procedures (ARC 3003, Revised January, 1984):

"Section B: Policies Established by the Board of Governors

1. The American Red Cross hereby affirms its purpose, desire, and intent to continue its service to victims of disasters. In so doing, the Red Cross will maintain its status as an independent voluntary body dedicated to performing the disaster preparedness and relief obligations entrusted to it by the Congress of the United States and will cooperate with all private and governmental bodies and agencies...."

Two other sections of the regulations provide additional details on the responsibility of the Red Cross for mass care services in the event of an accident that requires evacuation of population close to the New Hampshire Yankee nuclear power plant.

"Section D: Service Delivery in Special Operational Situations"

"3. Disasters with liability implications

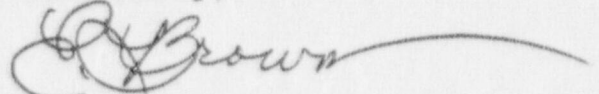
In disasters with company or owner liability implications, the customary emergency services are extended on either a mass care basis or to individuals and families if such help is not or cannot be provide immediately by the owner of the property involved...

"7. Peacetime nuclear accidents

In the event of a nuclear power plant accident or transportation accident involving radioactive material, and if public authorities order an evacuation of the area around the plant or the accident scene, the Red Cross provides mass care services for the evacuees and emergency workers...."

I hope that my comments and the several citations of Red Cross administrative regulations make it clear that, in the event of a nuclear accident at the Seabrook plant, the American Red Cross will fulfill its humanitarian responsibilities to the citizens of Massachusetts and New Hampshire by providing appropriate mass care services in cooperation with public and private organizations.

Sincerely,

A handwritten signature in cursive script that reads "Elbert Brown". The signature is written in dark ink and is positioned above the typed name and title.

Elbert Brown
Vice President/General Manager

Mr. Edward A. Brown
Chairman and Chief Executive Officer
New Hampshire Yankee Electric Corporation
PO Box 300
Seabrook, New Hampshire 03874