



Federal Emergency Management Agency

Region I

J.W. McCormack Post Office &
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Boston, MA 02109

September 27, 2001

Kathy Halvey Gibson, Chief
Emergency Preparedness and
Health Physics Section
Operator Licensing, Human Performance,
And Plant Support Branch
Division Inspection Program Management
Office of Nuclear Reactor Safety
Nuclear Regulatory Commission
One White Flint North
11555 Rockville Pike
Rockville, MD 20852-2738

Dear Ms. Halvey Gibson:

Recently FEMA Region I, received a letter from FEMA Headquarters requesting we provide the NRC additional information regarding provisions contained in community response plans. Specifically Region I was asked to address, "...what, if any, provisions are contained in the offsite emergency plans for the area around the Seabrook Station that address response actions for a radiological emergency which may develop concurrent with a severe winter snowstorm". Further, we were asked to provide information regarding the untimely notification of the Rockingham County Dispatch Center following the Seabrook Nuclear Power Station's March 5, 2001, declaration of an Unusual Event.

At 2350 hrs on March 5, 2001, the Seabrook Nuclear Power Station declared an Unusual Event. This notification was communicated, as per plans and procedures, from the power station to the New Hampshire State Police dispatch center. Once the message is confirmed the New Hampshire State Police dispatcher is required, per plan and procedures, to notify the New Hampshire Office of Emergency Management (NHOEM), the Office of Community and Public Health (OCPH), and the Rockingham County Dispatch Center (RCDC). The dispatcher failed to notify either OCPH or RCDC. He communicated the message to a representative of NHOEM. While this is a violation of the NHOEM plans and procedures, all Emergency Operations Centers (EOC) were open and operating, due to a severe snowstorm, and the failure had no effect on public safety. While necessary notifications were completed, they were delayed, and established plans and procedures were not followed or used.

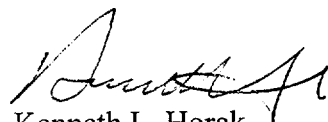
Enclosure 2

NHOEM subsequently conducted an inquiry to determine the cause for the delayed notification and needed actions to avoid a reoccurrence. When the Seabrook Nuclear Power Station communicated that the plant was at an Unusual Event classification level, the state police dispatcher was handling a myriad of emergency calls generated by the severe storm. In that context it appears that the dispatcher understood the notification to be another in a series of storm-related events and treated it accordingly. He did not strictly follow the notification procedures for a radiological incident requiring the use of the Radiological Emergency Response Plan (RERP). NHOEM verified that current NH RERP procedures and checklists were available and maintained at the NH State Warning Point (NH State Police Dispatch Center) but were not located by the dispatcher. On May 16 and June 1, 2001, in a cooperative venture, NH State Police and NHOEM conducted retraining of all six state police dispatch center personnel and their supervisors. In addition, refresher training in the overall RERP and the State Emergency Operations Plan was given to all state police troopers on a rotating basis over the last few months. NHOEM stressed during the training that an Unusual Event classification level at Seabrook Station, regardless of the cause, is a separate event that must be handled in accordance with the RERP.

To further clarify our June 1, 2001, letter regarding provisions contained in offsite Radiological Emergency Response Plans (RERP), there are no offsite plan provisions that specifically address evacuation during a radiological emergency that develops concurrent with a severe weather event. During the initial planning process, as explained in the above referenced letter, each community considers the effect adverse meteorological conditions will have on evacuation. The Evacuation Time Estimate Studies were developed using evacuation estimates during severe weather events as well as moderate weather conditions. Moreover, a community's ability to evacuate during adverse weather conditions is evaluated during the biennial power plant exercise using Objective 17.10 of the *Radiological Emergency Preparedness Evaluation Methodology*, (FEMA-REP-15; p 17-3; 1991), developed using the NRC/FEMA publication *Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Nuclear Power Plants* (NUREG-0654 FEMA-REP-1; J. k. 1; Rev.1; Supp. 1 p 19; 1988).

I hope that this information is responsive to your concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth L. Horak".

Kenneth L. Horak
Acting Regional Director

cc Vanessa Quinn
Sharon Stoffel
Robert Waters