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SEP 09 2004

Dr. Robert Bores
Technical Assistant for Plant Support
Division of Reactor Safety
Nuclear Regulatory Commission, Region I
475 Allendale Road
King of Prussia, Pennsylvania 19406

Dear Dr. Bores:

The purpose of this letter is to officially inform you of the Federal Emergency Management Agency's (FEMA) identification of an emergency operations facility (EOF) communication flow issue that occurred during the Beaver Valley Power Station (BVPS) Radiological Emergency Preparedness (REP) Exercise conducted on May 11, 2004. This issue was sent in the draft report to the Commonwealth of Pennsylvania for their response. The Commonwealth of Pennsylvania's comments attribute this EOF communications issue as a utility problem, and we concur with them on this issue. Therefore, this issue has been removed from our report and is being forwarded to the Nuclear Regulatory Commission to be addressed with Beaver Valley Power Station for resolution. Please see the detailed description of the issue and Commonwealth's comments listed below:

Condition: Information was not flowing effectively from the Bureau of Radiation Protection (BRP) liaisons at the Emergency Operations Facility (EOF) to the BRP Dose Assessment Staff at the Pennsylvania (PA) Emergency Operations Center (EOC). Communications were limited and delayed, resulting in difficulties in obtaining plant status and off-site release information and dose estimates in a timely manner. This was largely noted in the latter half of the exercise following the declaration of a General Emergency (GE).

Possible Cause: The weaknesses and delays noted in communications (and resulting frustrations on the part of the State of Pennsylvania representatives) stemmed largely from the following:

- (1) EOF briefings were too infrequent, particularly following the GE declaration—almost one hour lapsed between two of the briefings—this led to the compartmentalization of information in the licensee's EOF organization;
- (2) PA State representatives were not invited to the teleconference with the states/counties in which the first Protective Action Recommendation (PAR) was discussed, resulting in numerous questions as to the basis for the licensee's initial PAR;

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- (3) Separate briefings by the Emergency Director, his assistant, or the licensee's liaison with the States, employed earlier in the exercise, were not conducted as often as desired following the GE declaration;
- (4) The EOF status board, heavily used to convey key information in the first half of the event, was not updated from 1921 until 2101, preventing an important source of plant equipment status information from being readily available to the PA representatives; and,
- (5) The licensee relied heavily on communicating information via paper forms as opposed to the electronic display systems used by the other nuclear licensees in Pennsylvania which are easily visible to all personnel in the EOF.

Reference: NUREG-0654, A.1.d, A.2.a, b

Effect: There was considerable frustration experienced by BRP Staff located at the State EOC because information was not received in a timely manner. The BRP Dose Assessment Staff relies on information from the EOF to make informed recommendations to the State decision makers. There was a noted lack of timely, specific information on plant status, including release mechanism, release location, and pathway. The BRP Staff posed many questions via their liaisons at the EOF, but did not receive adequate or timely resolution. The BRP was not provided the rationale behind the first PAR issued by the licensee. This information is needed in order for the Dose Assessment Staff to formulate their PAR and for the State decision makers to make a protective action decision for the public.

Dose projections received from the utility were extremely delayed. The first projection (not including the unrelated tritium routine release projection) was received at 2000. The State is required to make an independent projection and compare its estimate to the utility's dose estimate and resolve any differences if the projections vary by greater than a factor of 10. The State received the projection late in the response and had to quickly resolve differences in underlying assumptions which could have been addressed earlier in the exercise so as not to potentially delay any recommendations provided to the decision makers. The dose model is also used to compare actual field monitoring data as they are measured. The dose model assumptions should be adjusted and revised early on with information provided by the utility. Timely receipt of data is required to achieve these objectives.

Recommendation: Since the causes for the communication difficulties are straightforward (see above) and most of the communication avenues already exist to avoid this concern, the issue is readily correctable by emphasizing the need for better communications by the licensee's personnel in the EOF.

Schedule of Corrective Actions: This most definitely should not be an ARCA against the Commonwealth of Pennsylvania. For proof, one need look no further than the **Possible Cause** paragraph above in the draft report. All five of the possible causes listed point exclusively to problems the licensee will have to correct. The frequency of EOF briefings and not inviting our representatives to the PAR notification teleconference are things we have been unsuccessfully requesting from the licensee for years. State LOs have little ability to influence how the utility uses its status board or the method it employs to communicate information. The plant must fix those.

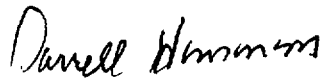
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From the write-up it is obvious that this ARCA belongs to the licensee and not us. The only corrective action would be to have FEMA coordinate with the NRC to force the utility to fix these problems. This ARCA should be removed from the state.

Your cooperation in addressing this communication issue with the Beaver Valley Power Station is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "Darrell Hammons". The signature is written in a cursive, slightly slanted style.

Darrell Hammons

Chairperson, Regional Assistance Committee