



FEMA

APR 29 2004

Mr. Nader L. Mamish
Director, Emergency Preparedness
Project Office
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Mamish:

This is in response to your letter dated March 11, 2004, requesting assistance to address concerns regarding emergency plans and procedures for nursery schools around the Three Mile Island (TMI) Nuclear Station, located in the Commonwealth of Pennsylvania.

Issue 1.

The joint Federal Emergency Management Agency (FEMA) and Nuclear Regulatory Commission (NRC) guidance document, NUREG-0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency response Plans and Preparedness in Support of Nuclear Power Plants, Planning Standard J, Protective Response and Appendix 4.II.C, provides criteria for each State and local organization to establish a capability for implementing protective actions for persons. This includes school children, within the plume exposure pathway emergency planning zone (EPZ) in the event such protective actions are needed in response to a radiological emergency at a commercial nuclear power plant. The need to address this issue of protective actions for school children stemmed from both the lack of detailed guidance on this issue and the expressed interest for such guidance from the public interest groups, State and local government officials and Federal Regional officials.

FEMA issued Guidance Memorandum (GM) EV-2, on November 13, 1986, Guidance Protective Actions for School Children (Enclosed). GM EV-2 is intended to aid Federal officials in evaluating emergency plans and preparedness for school children during a radiological emergency. This guidance is also intended to be used by State and local government officials and administrators of public and private schools, including licensed and government supported pre-schools and day-care centers, for developing emergency response plans for protecting the health and safety of students. The primary method for protecting school children is evacuation to relocation centers. Prompt evacuation is not advisable during exceptional situations such as having to drive through a radioactive plume or into a severe blizzard. Under these circumstances, school children should be temporarily sheltered and subsequently evacuated, if need be, as soon as conditions permit.

Attachment 3

EMA letter
to NRC

Issue 2.

Pre-school children are NOT left without designated Reception Centers outside of the EPZ. Reception Centers are designated for the general public of which pre-school children are considered a part.

Issue 3.

Parents should pre-arrange with daycare centers and nursery schools for procedures to follow during both routine and emergency situations regarding the safety and care of their children.

Issue 4.

As with issue 3, above, parents should review with daycare centers and nursery schools procedures and plans for the safety and protection of their children in not only radiological emergencies but all types of hazards.

Issue 5.

FEMA or NRC has no authority over child safety seat belt requirements.

Issue 6.

Again, as in issue 3 and 4 above, parents should review procedures with the daycare center and nursery school for picking up their children in cases of emergency.

Issue 7.

Daycare centers and nursery schools can be included in annual site inspections by local authorized government agencies if they so request. Daycare centers and nursery schools are considered private businesses and as such are not required by regulation to submit to annual site inspections during radiological emergency preparedness exercises.

Issue 8.

Again, as in issue 3, 4 and 6 above, parents should review procedures with the daycare center and nursery school for the care, accountability and safety of their children in cases of emergency.

Issue 9.

Potassium iodide (KI) tablets are available to the general public, and as with any medication, parents should review procedures with the daycare center and nursery school regarding the availability and use of any medications for their children.

Attachment 3

Issue 10.

As in issue 7 above, daycare centers and nursery schools are considered private businesses and as such there is no regulatory requirement to provide radiological emergency preparedness training for operators and their employees. However, training materials are available in local phone books and emergency management offices.

Issue 11.

As in issue 3, 4, 6 and 8 above, parents should discuss procedures with daycare centers and nursery schools regarding the care, accountability and safety of their children during an emergency.

Issue 12.

As with any emergency impacting the general public, "911" information lines are publicized and available for obtaining information, to include designated reception centers, if appropriate.

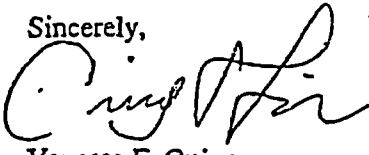
Issue 13.

The Emergency Alerting System (EAS) is limited to a two-minute message to alert the general public of an emergency and therefore would not be able to contain information specific to daycare centers and nursery schools. As a general consideration, the plans should contain a provision for notifying parents and guardians (e.g., through the EAS) of the status and location of their children during a radiological emergency.

Please keep in mind that daycare centers and nursery schools are considered private businesses in the Commonwealth of Pennsylvania as opposed to elementary, middle and high schools that are considered public institutions. As was stated in a letter dated January 10, 2003, from the Acting Director of the Pennsylvania Emergency Management Agency to the NRC, "Parents are legally required to send their children to public schools unless they opt to enroll them in private institutions. The use of private day-care facilities is voluntary on the part of the parents. There is no legal requirement to send children to them." However, the Commonwealth of Pennsylvania Department of Public Welfare issued a bulletin early this year requiring daycare centers to develop an emergency operations plan (EOP). This requirement takes effect six months from the date of the bulletin

Our Regional Office has investigated this allegation. If you have any further questions regarding this issue, please feel free to contact me at (202) 646-3664.

Sincerely,

for 

Vanessa E. Quinn
Chief

Radiological Emergency Preparedness Section

Enclosure

ATTACHMENT 3



FEMA

JUL 29 2004

Mr. Nader L. Mamish
Director, Emergency Preparedness
Directorate
Office of Nuclear Security and Incident Response
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Mr. Mamish:

This is in response to your letter dated June 8, 2004, requesting additional assistance to address concerns regarding emergency plans and procedures for nursery schools around the Three Mile Island (TMI) Nuclear Station, located in the Commonwealth of Pennsylvania. The joint Federal Emergency Management Agency (FEMA) and Nuclear Regulatory Commission (NRC) guidance document, NUREG-0654/FEMA-REP-1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, Planning Standard J, Protective Response and Appendix 4.II.C, provides criteria for each State and local organization to establish a capability for implementing protective actions for persons in response to a radiological emergency at a commercial power plant. This includes school children within the plume exposure pathway Emergency Planning Zone (EPZ). The need to address this issue of protective actions for school children stemmed from both the lack of detailed guidance on this issue and the expressed interest for such guidance from the public interest groups, State and local government officials and Federal Regional officials.

FEMA issued Guidance Memorandum (GM) EV-2, on November 13, 1986, Guidance for Protective Actions for School Children. GM EV-2 is intended to aid Federal officials in evaluating emergency plans and preparedness for school children during a radiological emergency. This guidance is intended to be used by State and local government officials and administrators of public and private schools, including licensed and government supported pre-schools and day-care centers, to develop emergency response plans to protect the health and safety of students. The primary method for protecting school children is evacuation to relocation centers. Prompt evacuation is not advisable during exceptional situations such as having to drive through a radioactive plume or into a severe blizzard. Under these circumstances, school children should be temporarily sheltered and subsequently evacuated, if need be, as soon as conditions permit.

The issues identified in the letter from the NRC are addressed in the following paragraphs.

Attachment 3

Issue 1.

Pre-school children are NOT left without designated Reception Centers outside of the EPZ. Reception Centers are designated for the general public of which pre-school children are considered a part.

Issue 2.

Parents should pre-arrange with daycare centers and nursery schools for procedures to follow during both routine and emergency situations regarding the safety and care of their children. The Commonwealth of Pennsylvania Department of Public Welfare issued a bulletin on December 27, 2003, requiring daycare centers to develop an Emergency Operating Procedure (EOP). The Bulletin and Draft EOP for Day Care Centers are enclosed. The enclosed Draft EOP for Nursery Schools delineates a listing of transportation providers and contact lists for drivers.

Issue 3.

As with issue 2, above, parents should review with daycare centers and nursery schools procedures and plans for the safety and protection of their children in not only radiological emergencies but all types of hazards. The Commonwealth of Pennsylvania Department of Public Welfare issued a bulletin on December 27, 2003, requiring daycare centers to develop an EOP. The enclosed Draft EOP for Nursery Schools delineates a listing of transportation providers and contact lists for drivers.

Issue 4.

FEMA or NRC has no authority over child safety seat belt requirements.

Issue 5.

Again, as in issue 2 and 3 above, parents should review procedures with the daycare center and nursery school for picking up their children in cases of emergency.

Issue 6.

Daycare centers and nursery schools can be included in annual site inspections by local authorized government agencies if they so request. Daycare centers and nursery schools are considered private businesses and as such are not required by regulation to submit to annual site inspections during radiological emergency preparedness exercises.

Issue 7.

FEMA or NRC has no authority over identification card and fingerprinting for children.

Attachment 3

Issue 8.

Potassium iodide (KI) tablets are available to the general public, and as with any medication, parents should review procedures with the daycare center and nursery school regarding the availability and use of any medications for their children. The decision for the administration of KI is the responsibility of the State.

Issue 9.

As in issue 6 above, daycare centers and nursery schools are considered private businesses and as such there is no regulatory requirement to provide radiological emergency preparedness training for operators and their employees. However, training materials are available in local phone books and emergency management offices.

Issue 10.

As in issue 2, 3, 5 and 7 above, parents should discuss procedures with daycare centers and nursery schools regarding the care, accountability and safety of their children during an emergency.

Issue 11.

As with any emergency impacting the general public, "911" information lines are publicized and available for obtaining information, to include designated reception centers, if appropriate.

Issue 12.

The Emergency Alerting System (EAS) is limited to a two-minute message to alert the general public of an emergency and therefore would not be able to contain information specific to daycare centers and nursery schools. As a general consideration, the plans contain a provision for notifying parents and guardians (e.g., through the EAS) of the status and location of their children during a radiological emergency.

Issue 13.

Please keep in mind that daycare centers and nursery schools are considered private businesses in the Commonwealth of Pennsylvania as opposed to elementary, middle and high schools that are considered public institutions. There is no legal requirement to send children to them. However, the Commonwealth of Pennsylvania Department of Public Welfare issued a bulletin on December 27, 2003, requiring daycare centers to develop an EOP.

Attachment 3

Our Regional Office has investigated this allegation and provided consensus on this response. If you have any further questions regarding this issue, please feel free to contact me at (202) 646-3664.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vanessa E. Quinn".

Vanessa E. Quinn

Chief

Radiological Emergency Preparedness Section

Enclosures

Attachment 3