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 DAVIS,A.B. Region 3, Ofc of the Director

SUBJECT: Transmits rept on corrective actions taken to resolve problems identified by FEMA in facility emergency plans.

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Iowa Electric Light and Power Company

August 15, 1988
NG-88-2743

A. Bert Davis
Regional Administrator
Region III
U. S. Nuclear Regulatory Commission
799 Roosevelt Road
Glen Ellyn, IL 60137

Subject: Duane Arnold Energy Center
Docket No: 50-331
Op. License No: DPR-49
State and County Emergency Plans
Reference: Confirmatory Action Letter, July 5, 1988
File: A-103, A-221a, A-304e

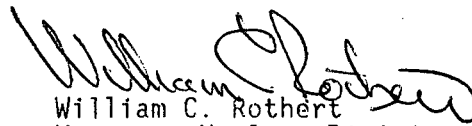
Dear Mr. Davis:

This letter transmits our report on corrective actions taken to resolve the problems identified by the Federal Emergency Management Agency (FEMA) in the State and County emergency plans for the Duane Arnold Energy Center (DAEC). The Attachment to this letter describes the resolution of each of the items identified in the referenced Confirmatory Action Letter.

The State of Iowa and Iowa Electric delivered to FEMA VII on July 27, 1988, revised plans for Linn, Benton, Johnson, Buchanan, and Scott Counties as well as amendments to the State plan. Preliminary discussions with FEMA VII reviewers indicate that this submittal, along with some additional information (referred to in the Attachment), will satisfy FEMA's concerns. The revised Evacuation Time Study (ETS) has been completed; it reflects the recent changes in offsite planning. The ETS was delivered to FEMA VII on August 12, 1988.

We are confident that these most recent submittals will resolve the FEMA concerns. We are looking forward to implementing the revised plans and to a successful exercise in November.

Very truly yours,


William C. Rothert
Manager, Nuclear Division

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Attachment: Report to NRC on Actions Taken in Connection with
July 5, 1988 Confirmatory Action Letter

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Report to NRC on Actions Taken in Connection with July 5, 1988 Confirmatory
Action Letter

By memorandum dated July 1, 1988, the Region VII office of the Federal Emergency Management Agency (FEMA) reaffirmed to FEMA Headquarters the negative finding concerning emergency planning for the Duane Arnold Energy Center (DAEC) which had been issued by FEMA Headquarters on March 30, 1988. The July 1 memorandum referred to thirty-three "inadequacies" which had been the basis for the March 30 negative finding. The July 1 memorandum reported that twenty-four of those thirty-three had been "adequately corrected" and listed nine items that remained unresolved. The memorandum also listed two additional "concerns." These eleven (nine plus two) items were incorporated into the NRC's Confirmatory Action Letter (CAL) of July 5 and all were identified as "inadequacies." We will address these eleven items individually, using the numerical designation (1 through 11) of the CAL.

Several of the eleven items (Items 1, 3, 4, 8, 11 and part of 6) resulted from the fact that the Dubuque Host County Plan could not be submitted as intended. Late in the planning process, it became evident to the State of Iowa and Iowa Electric that agreement could not be reached with Dubuque County to act as a host county. The plan which had been developed for Dubuque County did satisfactorily address the FEMA concerns but difficulties arose when some county officials became concerned about the possibility that highly contaminated cars might enter the county. Accommodation of this concern could not be reached in a manner satisfactory to State officials by the deadline for plan submittal, and the Dubuque Host County Plan was withdrawn. On June 17 the State and Iowa Electric began negotiations with Scott County to act as a host county in place of Dubuque County. The Scott Host County Plan received its final approval signature on July 19, 1988, and was submitted to FEMA VII by the State of Iowa on July 27, 1988.

The following summary addresses each of the CAL's eleven items, describing the actions taken by the State of Iowa, county officials and Iowa Electric to resolve problems identified by FEMA.

1. "Insufficient resources exist to provide monitoring, decontamination, and congregate care of evacuees living in the plume emergency planning zone. Specifically, Dubuque County was recently eliminated as a host county which was to accommodate over 9,500 evacuees. This elimination resulted due to restrictions imposed by the host county officials that contaminated vehicles not be allowed into their county. An effort by the State to resolve this concern, by providing resources to monitor vehicles before they entered the county, was unsuccessful. It is understood that negotiations are currently underway with another county to provide the appropriate resources for monitoring, decontamination, and congregate care to fill the void left by the loss of Dubuque County. However, as of this date, plans and procedures for an alternate host county have not been provided."

RESPONSE:

State officials and Iowa Electric had concluded on approximately June 17, 1988, that agreement could not be reached on a timely basis with officials of Dubuque County which would permit it to serve as a host county. When FEMA's Region VII wrote to FEMA Headquarters on July 1, the State and Iowa

Electric were trying to arrange for Scott County to serve as a host county but the arrangements were not complete and no Scott Host County Plan had been submitted to FEMA. Therefore, FEMA noted that resources had not yet been identified which would provide monitoring, decontamination, and congregate care for more than 9,500 potential evacuees living in the plume exposure emergency planning zone.

Scott County will serve as a host county (in addition to Johnson and Buchanan Counties). Resources in Scott County to provide adequate monitoring, decontamination, and congregate care for more than 9,500 persons have been identified. An emergency plan which identifies the specific resources to be used and specifies how they are to be mobilized has been written, reviewed, and approved by appropriate county officials in Scott County. The approval process was completed on July 19, 1988, and representatives of the State of Iowa delivered the Scott Host County Plan to FEMA's Region VII office on July 27, 1988.

2. "The Linn County Plan fails to document the appropriate dosimetry to be provided to school bus drivers. Permanent record dosimetry is not accounted for."

RESPONSE:

Problems in connection with dosimetry for school bus drivers were identified by FEMA early in its review. Efforts by State and County officials and IE to resolve the issues succeeded in reducing the scope of the problem. The Linn County Plan which had been submitted on June 22, 1988 was intended to fully resolve FEMA's previously-expressed concerns but the language used was unclear. The Plan has been revised to eliminate the apparent confusion; Figure II-K-3 was added to indicate, in tabular form, dosimetry requirements for all emergency workers which includes bus drivers. The unclear language was removed and replaced by reference to Figure II-K-3. The revised Linn County Plan was delivered by representatives of the State of Iowa to FEMA's Region VII office on July 27, 1988.

3. "Some of the transportation resources for the evacuation of school children from the metropolitan Cedar Rapids area are questionable. Per the Linn County Plan, the public school system in West Dubuque, Dubuque County, was to provide buses for transportation of school children out of the Cedar Rapids metropolitan area. However, Dubuque County has been eliminated as a host county. Therefore, the State must reassure that these resources are still available to evacuate the schools in Linn County, or provide for alternative transportation sources."

RESPONSE:

This item states that some of the buses identified in the Linn County Plan as available for transporting school children from the Cedar Rapids metropolitan area are "questionable." Since these buses are to come from a public school system in Dubuque County and that County was being eliminated as a host county, FEMA requested reassurance as to their availability (or provision of alternative transportation).

There is no connection between use of the West Dubuque School District buses for transporting school children and use of Dubuque County as a Host County.

The buses in question will be available to transport school children from the Cedar Rapids metropolitan area in an emergency despite the fact that Dubuque County is not designated to be a Host County. On June 9, 1988, the West Dubuque School District Superintendent signed a Letter of Agreement (LOA) to make the buses available and, following FEMA's expression of concern, he re-affirmed this commitment in a July 11, 1988, telephone conversation. Under the LOA, all West Dubuque School District buses and their qualified drivers will be available to support evacuation pursuant to the Linn County Plan. Therefore, the State of Iowa is reassured that these resources are still available to evacuate the schools in Linn County.

4. "Shelter profiles which document the number of spaces, showers, contact persons, etc., are incomplete as Dubuque County has been eliminated as a host county."

RESPONSE:

Dubuque County has been replaced by Scott County as a host county. Profiles have now been submitted for all relocation facilities in the three Host Counties. They are found in Attachment E to each host county plan submitted to FEMA by representatives of the State of Iowa on July 27, 1988.

5. "Inconsistencies exist within the Linn County Plan concerning the type of dosimetry to be provided to emergency workers. In addition, in some cases permanent record dosimetry is not provided for in the plans."

RESPONSE:

This item in effect restates Item 2 above and refers to the lack of clarity regarding the dosimetry to be provided for emergency workers. Several inconsistencies regarding emergency worker dosimetry existed between various pages in Sections II-K and II-H of the Linn County Plan. The addition of Figure II-K-3 (see response to Item 2) as well as revising the plan to specify specific types of dosimetry consistent with Figure II-K-3 has resolved the confusion. The revised Linn County Plan was delivered by representatives of the State of Iowa to FEMA's Region VII office on July 27, 1988.

6. "Floor plans for the reception, monitoring and decontamination functions are incomplete as Dubuque County has been eliminated as a host county. Plans and procedures for an alternate host county have not been submitted."

"In addition, the floor plans of the facilities to be utilized for monitoring and decontamination as shown in the Johnson County host plan are incomplete and in some cases incorrect. None of the seven facilities indicate where registration of evacuees will occur. Two of the seven fail to indicate where evacuees enter the facility and where monitoring actually occurs."

RESPONSE:

Complete floor plans have been submitted for all facilities in the three Host Counties which are designated for reception, monitoring, and decontamination of potential evacuees.

The floor plans for facilities in Scott County (which replaced Dubuque County as a Host) are found in Attachment E to the Scott Host County Plan which the State of Iowa Submitted to FEMA on July 27, 1988.

Revised floor plans for facilities in Johnson County were prepared and submitted in Attachment E to the revised Johnson Host County Plan which the State of Iowa delivered to FEMA on July 27, 1988. The floor plans show where evacuees would enter the facility, where monitoring would occur, and where registration would occur.

7. "The host county plans fail to document that personnel and equipment exist to monitor, within a 12-hour period, a minimum of twenty percent (20%) of the estimated population to be evacuated pursuant to FEMA policy. The host county plans document the number of monitors required for this function; however, they fail to specifically identify from where these resources will be provided. Therefore, it cannot be stated, without equivocation, that the actual resources for monitoring are readily available, especially in Johnson County where the plan states that 115 monitors will be utilized."

RESPONSE:

The Johnson County Plan has been revised to address FEMA's comment and submitted to FEMA by the State of Iowa on July 27, 1988. The Plan for Johnson County now specifies that the Iowa City Fire Department will furnish 30 persons trained to provide monitoring and decontamination services; Iowa Electric will furnish 85 of its employees, also trained to provide those services. A Letter of Agreement (LOA) has been entered into by Iowa City (the Mayor and Fire Chief), the Johnson County Civil Defense organization, and Iowa Electric; it is contained in Attachment F to the Plan submitted to FEMA.

The Plan for Buchanan County states that a total of 24 persons to provide monitoring and decontamination services will be furnished from two groups of firefighters. The Mental Health Institute Fire Department has 25 firefighters and the Independence Fire Department has 26 firefighters. The Superintendent of the Institute and the Mayor of Independence, have signed the Plan. LOAs have been executed with the individual fire chiefs and included in the the Plan. The LOAs were telecopied to FEMA VII on August 9.

The Scott Host County Plan states that 42 radiological monitoring and decontamination personnel will be drawn from the following fire departments: Eldridge (which has 30 firefighters), Long Grove (25), Pleasant Valley (25), and Riverdale (17). The chief of each fire department has signed the Plan. The Mayor of Eldridge has also signed; the three other fire departments are in independent fire districts and do not report directly to municipalities. Additional LOAs have been obtained from Eldridge, Long Grove, and Pleasant Valley and were telecopied to FEMA VII on August 11, 1988. The Riverdale Board of Trustees meets on August 15, 1988 and will sign an LOA at that meeting. The Riverdale LOA will be telecopied to FEMA VII on August 16, 1988.

With respect to monitoring equipment, the Buchanan and Johnson County Host Plans were revised to indicate where the equipment is stored and procedures

for distribution. Similar provisions were included in the Scott Host County Plan.

8. "The means for decontamination of emergency workers, supplies, instruments and equipment are incomplete as Dubuque County has been eliminated as a host county. The procedures have not been provided as an alternate host county has not been identified."

RESPONSE:

The Scott Host County Plan identifies the means for decontaminating emergency workers, supplies, instruments, and equipment within that County (which has replaced Dubuque County in emergency planning for DAEC). The Scott Plan was submitted to FEMA on July 27, 1988.

9. "The Evacuation Time Study (ETS) remains to be corrected to reflect the evacuation routes as shown in the Linn and Benton County Plans. The submission of the revised ETS is due August 12, 1988."

RESPONSE:

The revised ETS was submitted to FEMA VII on August 12, 1988. It incorporates changes in the population and transportation network since the original estimate was prepared in 1981, and subsequently updated in 1983. The evacuation routes used in the ETS include those shown in the current Plans for Linn and Benton Counties.

10. "The ability to decontaminate evacuees at the Buchanan County host facility is questionable. The plan calls for the use of eight mobile showers instead of fixed showers per the original plan submission. Concerns exist regarding the use of this equipment such as: how and where those showers will be setup; how the contaminated waste water is accounted for; and who maintains the equipment."

RESPONSE:

The revised Buchanan Host County Plan, submitted by the State on July 27, 1988, includes details regarding planning for decontamination at the host facility in Buchanan County. These details, include the shower set up, waste water flow, and personnel responsible for equipment. Therefore, the ability to decontaminate evacuees is demonstrated in the Plan.

11. "As Dubuque County was eliminated as a host county, the following concerns have been identified and must be addressed by the State:
 - a. The Evacuation Time Study (ETS) must be amended to reflect the changes in evacuation routes, and any other issues relative to the change in host counties. Submission of the revised ETS is due August 12, 1988.
 - b. The Linn and Benton County Plans must be amended to reflect the elimination of Dubuque County.
 - c. The public information brochures must be amended to reflect the change in evacuation routes and relocation centers."

RESPONSE:

- a. The revised ETS submitted on August 12, 1988, incorporates all changes made in planned evacuation routes and other relevant changes in planning for Host Counties.
- b. The revised Linn and Benton County Plans which were submitted to FEMA by the State on July 27 identify the Host Counties as Johnson, Buchanan, and Scott.
- c. The public information brochure has been revised to show changed evacuation routes and relocation centers and is undergoing final workup for printing. The brochure will be sent to the printer when all problems have been resolved to FEMA's satisfaction.