

APR 24 1970

30-263

Mr. Russell Hatling  
Director of Public Information  
Minnesota Environmental Control  
Citizens Association  
26 East Exchange  
St. Paul, Minnesota 55101

Dear Mr. Hatling:

Your letter of March 9, 1970, to Chairman Seaborg, which has been referred to me for response, raised several points concerning the adequacy of emergency preparedness associated with the Monticello station. To discuss emergency planning in proper perspective, it is necessary to describe briefly the overall review process associated with the granting of a license to operate a nuclear power plant.

The AEC's review of an application to construct a reactor facility (such as the one filed by Northern States Power Company (NSP) for the Monticello facility in August 1966) involves a thorough examination by experts of the acceptability of the proposed site, the adequacy of the design features and criteria provided to prevent accidents and to limit the potential consequences of any possible accidents. Examples of accident-preventing design features include the extensive and redundant control systems designed to shut down the plant at very conservative levels in the event operating parameters approach values which indicate abnormal conditions. The provision of conservatively designed primary coolant systems and containment are examples of consequence-limiting design features. The AEC regulatory staff's evaluation of the application is supplemented by an independent review by the Advisory Committee on Reactor Safeguards (ACRS). Both the AEC regulatory staff and the ACRS make extensive use of consultants in special technical disciplines who are active both in government and industry. The AEC also assures that the applicant will provide a very thorough and carefully reviewed program for quality assurance during design, construction and operation. In addition, the application is again reviewed at a public hearing by an Atomic Safety and Licensing Board. After considering all evidence introduced at such a hearing the Board makes a determination as to whether the issuance of a construction permit should be authorized.

Prior to issuing an operating license for a reactor facility, the AEC staff and the ACRS perform thorough reviews of the final design of the plant to assure that the facility was constructed as proposed. As part of the safety review at the operating license stage, the AEC determines whether the applicant possesses sufficient technical competence to operate the plant so that there is no undue risk to the health and safety of the public.

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Our review of emergency plans proposed by applicants such as NSP is performed as one part of the overall safety review briefly described in the foregoing discussion. More specifically, with regard to emergency preparedness, we determine that the applicant has prepared an emergency plan for coping with potential accidents which provides for:

- a. an organization for coping with potential emergencies, in which authorities and responsibilities are clearly delineated, and which provides for rapid mobilization of personnel possessing unique qualifications to be utilized in an emergency;
- b. determining the magnitude of any release of radioactive material from the plant site;
- c. determining what protective measures, if any, should be undertaken;
- d. establishing agreements with local, state and federal officials regarding procedures for implementation of protective measures, should these steps become necessary or desirable;
- e. emergency first aid and personnel decontamination;
- f. treatment of the injured at off-site treatment facilities;
- g. testing of emergency plans to assure that plant personnel are familiar with their emergency duties;
- h. training of persons other than employees of the licensee whose assistance may be needed in the event of an emergency; and
- i. establishing post-accident recovery procedures.

Based on our review of the Monticello application for a provisional operating license we have concluded that NSP has an adequate plan to cope with emergency situations in accordance with the aforementioned list of characteristics of emergency plans.

As your discussions with Minnesota officials have emphasized, the decision to evacuate the public is a very important one. The responsibility and authority to order and direct such an action belong to state and local officials.

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In the extremely unlikely event of an accident which made evacuation necessary or desirable, the responsible public official would base his initial decision, in large part, on information immediately available from the licensee regarding the nature and extent of the radiological hazard. The methods of implementation of evacuation of large numbers of people, in the face of radiological hazard, would not differ substantially from those employed in the event of other major industrial accidents or natural disasters such as floods or tornadoes. In view of the demonstrated capability of state and local agencies in Minnesota to cope with emergencies, as for example in "Operation Foresight" in the spring of 1969, we are unable to agree with your conclusion that the State of Minnesota is "...totally unable to cope with an emergency should it occur."

As you are aware, the Commission has scheduled a public hearing for April 28, 1970, in St. Paul, Minnesota, to consider whether a provisional operating license should be issued for the Monticello facility. Your organization, the Minnesota Environmental Control Citizens Association, has been admitted as a party to that proceeding. I would suggest that you consult the NSP application and the AEC regulatory staff's Safety Evaluation (copy attached) for further detail regarding the NSP emergency plans and their adequacy.

Sincerely,

Original Signed by  
Peter A. Morris

Peter A. Morris, Director  
Division of Reactor Licensing

Enclosure:  
Safety Evaluation for  
Monticello facility

bcc w/o encl:

H. L. Price, DR  
C. K. Beck, DR  
C. L. Henderson, DR  
M. M. Mann, DR  
J. Felton, DR  
H. K. Shapar, OGC  
D. J. Skovholt, DRL  
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