

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

Title: MEETING WITH PUBLIC OFFICIALS HAVING RESPONSIBILITY FOR
EMERGENCY PLANNING FOR PILGRIM NUCLEAR POWER PLANT

Location: ONE WHITE FLINT NORTH, ROCKVILLE, MARYLAND

Date: FRIDAY, DECEMBER 9, 1988

Pages: 1-185

ORIGINAL

Ann Riley & Associates

Court Reporters

1625 I Street, N.W., Suite 921

Washington, D.C. 20006

(202) 293-3950

1

2

3

4

5

DISCLAIMER

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

This is an unofficial transcript of a meeting of the United States Nuclear Regulatory Commission held on 12-9-88 in the Commission's office at One White Flint North, Rockville, Maryland. The meeting was open to public attendance and observation. This transcript has not been reviewed, corrected, or edited, and it may contain inaccuracies.

The transcript is intended solely for general informational purposes. As provided by 10 CFR 9.103, it is not part of the formal or informal record of decision of the matters discussed. Expressions of opinion in this transcript do not necessarily reflect final determination or beliefs. No pleading or other paper may be filed with the Commission in any proceeding as the result of, or addressed to, any statement or argument contained herein, except as the Commission may authorize.

1 UNITED STATES OF AMERICA
2 NUCLEAR REGULATORY COMMISSION

3 ***

4 MEETING WITH PUBLIC OFFICIALS HAVING RESPONSIBILITY FOR
5 EMERGENCY PLANNING FOR PILGRIM NUCLEAR POWER PLANT

6 ***

7 PUBLIC MEETING

8 ***

9 Nuclear Regulatory Commission
10 One White Flint North
11 Rockville, Maryland

12
13 FRIDAY, DECEMBER 9, 1988
14

15 The Commission met in open session, pursuant to
16 notice, at 2:00 P.M., the Honorable LANDO W. ZECH, Chairman of
17 the Commission, presiding.

18 COMMISSIONERS PRESENT:

19 LANDO W. ZECH, Chairman of the Commission
20 THOMAS M. ROBERTS, Member of the Commission
21 JAMES R. CURTISS, Member of the Commission
22 KENNETH CARR, Member of the Commission
23 KENNETH ROGERS, Member of the Commission
24
25

1 STAFF AND PRESENTERS SEATED AT THE COMMISSION TABLE:

2	S. CHILK	P. AGNES
3	W. PARLER	B. HAUSNER
4	A. THOMPSON	D. QUAID
5	D. HADFIELD	V. STELLO
6	M. FEHLOW	B. LAZARUS
7	P. DOWD	T. MURLEY
8	C. O'NEIL	W. RUSSELL
9	H. COPELLO	R. BELLAMY
10	R. REED	D. McDONALD
11	D. MCGONAGLE	T. BARLOW
12	C. NOYES	A. WAITKUS-ARNOLD

13

14

15

16

17

18

19

20

21

22

23

24

25

P R O C E E D I N G S

[2:00 P.M.]

1
2
3 CHAIRMAN ZECH: Good afternoon, ladies and gentlemen.
4 The Pilgrim Nuclear Power Station in Plymouth, Massachusetts,
5 was given a Nuclear Regulatory Commission operating license in
6 September, 1972, and was in commercial operation until it was
7 shut down by Boston Edison Company on April 12, 1986, due to a
8 series of equipment problems. The Nuclear Regulatory
9 Commission Region I, subsequently issued a Confirmatory Action
10 Letter confirming Boston Edison Company's intent to keep the
11 plant shut down until certain equipment and management
12 deficiencies had been corrected.

13 Since that time, the plant has remained shut down as
14 corrective actions were undertaken. In August of 1987, the
15 Federal Emergency Management Agency, or FEMA, withdrew its
16 finding of adequacy with respect to Massachusetts' planning for
17 radiological emergency response around Pilgrim, based on the
18 identification of six issues which called into question the
19 adequacy of state and local emergency response planning.

20 On October 14, 1988, the Commission was briefed on
21 the readiness of the Pilgrim Station to resume operation, by
22 officials of the Boston Edison Company, the NRC staff, and
23 several members of Congress and the Lt. Governor of
24 Massachusetts, including the status of each of the six FEMA
25 issues. Subsequent to the October 14th meeting, staff

1 representatives met with civil defense directors and other
2 local officials in the seven emergency planning zones and
3 reception centers -- communities around Pilgrim.

4 These meetings were held to enable the NRC to obtain
5 first-hand information on the status of the local emergency
6 plans and procedures, and to hear the concerns of local
7 officials. The results of these meetings were made available
8 to the Commission. Today we will hear from local officials
9 concerning the status of off-site emergency preparedness at
10 Pilgrim, including the readiness and ability of local officials
11 to execute existing emergency plans.

12 Following these presentations, we will hear again
13 from state officials. Finally, we will hear from the NRC staff
14 with an update for the Commission concerning the readiness of
15 the Pilgrim facility to return to power operation. This should
16 include briefing of the Commission on the staff papers
17 submitted November the 15th to the Commission, summarizing the
18 status of off-site emergency preparedness. That paper is
19 available for review in the NRC public document room.

20 I request that the staff closely monitor the
21 presentations today, and inform the Commission if any new facts
22 are presented that would have an effect on the staff's previous
23 conclusions regarding off-site emergency planning at Pilgrim.
24 This is the only business which is before the Commission this
25 afternoon, and the scheduled witnesses who have been notified

1 are the only ones who will be heard from today.

2 This agenda is required conduct of this meeting. If
3 anyone other than the scheduled witnesses has something to
4 contribute to the Commission's consideration of this matter,
5 they are requested to do so in writing to the Secretary of the
6 Commission at the earliest opportunity. Today's meeting is for
7 information only. There is no vote scheduled today. The
8 Commission will require some time in order to reflect on what
9 is heard today, before authorizing the NRC staff to act on the
10 Boston Edison's request to restart the Pilgrim Plant.

11 Do any of my fellow Commissioners have any opening
12 comments to make before we begin? Commissioner Roberts?

13 COMMISSIONER ROBERTS: This is a very important
14 matter, and it has my full and undivided attention, but we have
15 a full and ambitious list of people to hear from. The meeting
16 is scheduled to end at 4:00. I suspect it will run over. I
17 must leave at 5:00 for a family committment. I will read the
18 transcript of any portion of the meeting that I miss.

19 My leaving does not indicate any lack of interest in
20 this matter. Thank you.

21 CHAIRMAN ZECH: Commissioner Carr?

22 COMMISSIONER CARR: Yes. As you've heard in August
23 of 1987, FEMA withdrew its finding of adequacy with respect to
24 Massachusetts' planning for radiological emergency response
25 around Pilgrim. That withdrawal was based on the

1 identification of six issues which called into question the
2 adequacy of state and local emergency response planning. In
3 order for FEMA to again issue a finding of adequacy, it is
4 necessary that the Commonwealth, working in cooperation with
5 the local governments, the appropriate federal agencies and the
6 Boston Edison Company, resolve those six issues.

7 The Commission understands that substantial progress
8 has been made in that regard. At the Commission meeting today,
9 I hope to hear from Commonwealth and the local governments
10 about their progress in the last year and four months. I, for
11 one, am particularly interested in hearing what has been
12 achieved and what remains to be accomplished. I believe that
13 the schedule and plans for completion of any remaining tasks
14 are of particular interest to the Commission.

15 Although the Commission is particularly interested in
16 resolution of the six FEMA issues, we are aware that there are
17 state and local emergency planning concerns that go beyond the
18 federal planning requirements and the six FEMA issues. Whether
19 the Commonwealth and local governments desire to expend their
20 resources on emergency planning beyond the baseline of federal
21 requirements, is a matter of their judgment.

22 However, it must be recognized that notwithstanding
23 the desire to do more, the Commission is guided the principle
24 of adequate, not absolute assurance of public safety. The
25 plans must help achieve reasonable protective measures, but

1 they need not be perfect, nor can there be the perfect plan.

2 Our regulations recognize that emergency planning is
3 dynamic process, and that gaps or deficiencies may arise in
4 emergency plans or preparedness. But our regulations do not
5 require the shutdown or continued suspension of operation for
6 every planning deficiency or open item. That is why I believe
7 it is particularly important for the local communities to put
8 the issues yet to be resolved in the greater context of their
9 existing capability and committment to emergency response.

10 With that, I look forward to hearing the progress
11 made by these responsible governments to resolving the
12 emergency planning issues for Pilgrim.

13 CHAIRMAN ZECH: Thank you very much. Are there any
14 other comments?

15 [No response.]

16 CHAIRMAN ZECH: If not, I would like to welcome each
17 of the Massachusetts officials who have come here today to
18 present information to us on this important matter. Ms.
19 Thompson, who is the Chairman of the Board of Selectmen of
20 Plymouth, Massachusetts, is our first speaker. Ms. Thompson,
21 welcome. You may proceed.

22 MS. THOMPSON: Thank you. Also attending this
23 hearing from Plymouth, is our Civil Defense Director, Douglas
24 Hadfield and Mrs. Marie Fehlow representing the Nuclear Matters
25 Advisory Committee, and also one of your speakers later, and

1 Ann Waitkus-Arnold who is the Chairman of the Plymouth Handicap
2 Commission, but is speaking in another context this afternoon.

3 The town of Plymouth welcomes this opportunity to
4 speak directly to the Commissioners in the scheduled meeting.
5 I have been told that it is the first time in the history of
6 the NRC that local officials have had such an invitation. If
7 that's true, I applaud your decision that permits the voice of
8 the people to come through. As the spokesman for historic
9 people, I thank you.

10 It's our feeling that this hearing should have
11 happened long ago, and it should have happened in the area of
12 greatest concern in the emergency planning zone itself. Our
13 New England traditions of government make that a reasonable
14 expectation for us. It's the responsibility of the Plymouth
15 Board of Selectmen to develop, to approve and to implement all
16 emergency planning, whether it be for the natural disasters
17 such as storms to which we are a constant companion, or whether
18 it is for radiological response to an accident at the Plymouth
19 Nuclear Power Station.

20 Emergency planning is part of our public safety
21 responsibilities that we take an oath to uphold. These are
22 serious commitments to protect the life and the property of the
23 citizens of Plymouth. The Plymouth Board of Selectmen is
24 composed of five persons elected to the highest executive body
25 of the town. The statement that you are hearing today is

1 unanimously approved by those five.

2 That particular Board has a wealth of experience to
3 bring to bear in the area of civil defense. Three of us are
4 veterans of active military service. George Butters is a
5 retired officer of fire fighters. David Malaguti is in the
6 construction trades. Bruce Arons is a businessman. George
7 Cameron is a fire and arson specialist. Albert Thompson has
8 had civil defense experience and large evacuation experience.

9 Our's is hard-working Board, well equipped for a
10 rational approach to emergency planning. In addition, we now
11 have Douglas Hadfield, trained Civil Defense Director full-
12 time, who served the town for eight years in a volunteer
13 capacity, and was hired in January of 1988 -- this year -- as a
14 full-time Civil Defense Director. The 1985 radiological
15 emergency plan for the town, to which you referred when you
16 spoke about FEMA, was about one half inch thick.

17 It as an eleven by eight notebook. Our present draft
18 plans and procedures now fill seven, two and one half inch
19 binders, and there are many more that are still to come. Yes,
20 we have made and we are making genuine progress in our effort
21 to plan for radiological emergency. For us, it is a
22 prioritized, continuing task, especially in the face of
23 repeated statements made by individuals, that the NRC is going
24 to restart the Pilgrim Nuclear Power Station, and that that is
25 imminent.

1 I cannot express too strongly that while Plymouth has
2 come a long way in the planning process, we still have a long
3 way to go. We have a heavy sense that we're not prepared at
4 this time to respond effectively to a radiological accident of
5 major proportions. Our's is not just a matter of facing
6 multiple regulations. Our's is a moral responsibility to be
7 prepared to assist our citizens -- all of them -- under
8 conditions of tensions and fear.

9 There are several factors that make planning in the
10 town of Plymouth a complex and a difficult process. In terms
11 of area, we are the largest town in Massachusetts -- 103 square
12 miles. We have a coastline on Massachusetts Bay which is 17
13 miles long. That means we have no hope of egress for about 180
14 degrees. One, our year 'round population is 45,000 and
15 growing. We have grown by one and one half times since Pilgrim
16 Nuclear Power Station opened in 1972, and we are the fastest
17 growing community in all of southeast Massachusetts.

18 In the warmer seasons of summer and spring and fall,
19 an additional 20,000 residents who own or rent in our town,
20 join us for long periods of time, and because we are one of the
21 nation's historical treasures, we receive over 1 million other
22 transient visitors. Because of that great geographical spread
23 of 103 square miles, we find five distinct groupings of village
24 centers, according to what call our comprehensive plan.

25 Incidentally, our center of population in that 17

1 miles along the coast, is in South Plymouth, which is close to
2 the nuclear power station. South Plymouth is our fastest
3 growing area, exacerbating the updating of the whole process.
4 At the moment, South Plymouth is served by one very small fire
5 station. The police station, the town hall, and the civil
6 defense headquarters are 12 road miles away from South
7 Plymouth.

8 The Manomet Section of Plymouth surrounds the Pilgrim
9 Nuclear Power Station and is also one of our fastest growing
10 areas with numerous subdivisions planned, and with several
11 popular beaches. I must tell you that in the past year, this
12 portion of the year, we have already issued over 800 permits
13 for new homes in the town of Plymouth.

14 The road network around Plymouth is deficient for our
15 normal needs. Since Route 3-A is the country's oldest road,
16 winding its way through the business center of a string of
17 towns leading to Boston, the expressway, Route 3, which
18 parallels 3-A to the West, is the main Boston to Cape Cod
19 Highway.

20 Route 44 is the main East-West route out of Plymouth
21 to Providence and New York. It's a meandering, overloaded
22 antique with dangerous intersections at Route 3, which are
23 currently the worst traffic accident scenes in the entire town.
24 That's all a matter of record.

25 All three major evacuation routes are but two lane

1 and suffer gridlock during normal rush hours, during the summer
2 visitor influx and during storms. Our police and fire chiefs
3 have serious concerns about response time, given the conditions
4 of our roads under normal conditions, let alone under disaster
5 conditions.

6 Our eleven schools are scattered all through our
7 large area to serve our various centers of population. We have
8 one of the largest school-age populations in the state. We
9 have over 8,000 students and 1,000 staff members. The task of
10 evacuation is tremendous when we consider that six schools are
11 with five miles of the Pilgrim Nuclear Power Station, and the
12 Manomet Elementary School is only 2.3 miles from the plant.

13 The entire emergency planning zone has exactly one
14 hospital. Is the Jordan Hospital in Plymouth, and it is 3.5
15 miles from the Pilgrim Nuclear Power Station. It has only one
16 decontamination room, dedicated first to serving workers of the
17 plant itself, and only secondarily, the citizens of the Town of
18 Plymouth.

19 The administration of the hospital has had such
20 difficulty in its planning, it has not yet been able to pass to
21 our Civil Defense Director, an approved first draft to
22 planning. To give you some idea of the scope of our plans, we
23 must consider nine summer camps, sixteen pre-school daycare
24 centers, eight nursing homes, six elderly congregate housing
25 projects, the large Plymouth County Jail and House of

1 Correction, a Massachusetts Correctional Institution, a vast
2 state park of 15,000 acres, included within that are twelve
3 lakes, whose daily camping and recreational visitors reach many
4 thousands at various times.

5 I hope you have some idea of the complexity of our
6 preparations for radiological response. I'm sure you want to
7 know most the present status of our emergency planning. To
8 encapsule in one statement; we have come a long way, and we
9 have a long way to go. We are proceeding with all speed
10 commensurate with effective planning.

11 Our channel of progression begins with the work of
12 our Civil Defense Director, Hadfield, which town department or
13 private agency. Once the department has a plan it believes it
14 can operate, the department head signs off. The draft then
15 moves to the Radiological Emergency Response Planning Committee
16 for review. That Committee includes a Selectman as Chairman,
17 the Civil Defense Director, the Police and Fire Chiefs,
18 representatives of the Department of Public Works, the School
19 Department, Public Health, as well as three at-large citizens.

20 The Committee reviews all plans, and when satisfied,
21 passes the draft to the Board of Selectmen which studies and
22 moves toward approval. Obviously, anywhere along that line of
23 evaluation, the draft could be returned for additions and
24 changes. The aforementioned channel is a good vehicle for
25 arriving at prudent decisions.

1 However, there still remains the never-ending task
2 for periodic updating, as is the case in all strategic
3 planning. At the moment, Plymouth has an incomplete, untested
4 draft of plans. The task of public education has barely begun.
5 The slim, general draft has had only a technical review by the
6 Federal Emergency Management Agency.

7 That review was almost a useless generic matching
8 against NUREG-0645. All five EPZ towns received exactly the
9 same generic report -- hardly reassuring, since the
10 circumstances of our planning are quite different. I must also
11 tell you that Plymouth got somebody else's plan in that same
12 packet -- not even our own plan, and had to ask for the return
13 of our own plan.

14 We are in the process of writing implementing
15 procedures which, of course, are the responsibilities and
16 necessary actions for each department. We require 90
17 implementing procedures. The Selectmen have approved 34 in
18 concept. None of those IP's have been forwarded to the State
19 Civil Defense Agency.

20 Now, here is the heart of the difficulty. Key
21 portions of the implementing procedures are still being
22 developed. Police, fire, schools, hospital, handicapped
23 populations and Saquish, an isolated beach peninsula, are in
24 various draft stages. These absolutely essential aspects of
25 our emergency plans are incomplete or in a preliminary form.

1 To summarize, we are working assiduously, but our radiological
2 planning is far from being complete, and therefore is not
3 approved at the local level; has had no higher review; and is
4 untested.

5 Anyone who believes our town is ready for restart of
6 Pilgrim Nuclear Power Station, has not really examined our
7 ability to respond to nuclear emergency. The unanimous
8 position of the Board of Selectmen is that Pilgrim Nuclear
9 Power Station ought not be permitted to restart, until they are
10 effective radiological emergency response plans in place, which
11 have been approved and tested.

12 The Board took this position based on sound
13 reasoning. First; the Plymouth Nuclear Power Station has had
14 many years of troubled history, reflected by numerous NRC
15 fines, poor self evaluation and maintenance and management
16 problems.

17 Two; radiological control continues to earn only a 3,
18 the lowest numerical category of the SALP report. Three; the
19 mounting levels of radioactive spent fuel rods and other highly
20 contaminated debris in the on-site pool is a community concern.

21 Four; in the two and one half years the Pilgrim
22 Nuclear Power Station has been off-line, there have been a
23 large number of recent key appointments of personnel without
24 any operational experience at Plymouth Nuclear Power Station,
25 and some of those with little boiler water reactors.

1 Next, Plymouth has had a full-time Civil Defense
2 Director for one year only, his appointment having been made in
3 January of this year. A year of concentrated effort has not
4 been long enough to produce all the town needs in radiological
5 planning or preparation of our emergency operations center, or
6 marshalling of the volunteers -- to mention only some of his
7 responsibilities.

8 Next, no present drafts of plans or operating
9 procedures have ever been approved by FEMA. No present drafts
10 have ever been tested, and basic training in our departments
11 and agencies is incomplete, and in some of them has not even
12 begun. There are surely continuing problems of communication
13 between Boston Edison and the Town of Plymouth. I'm hopeful
14 that this brief outline, rooted firmly in the collective wisdom
15 of our staff, has given you insights into our preparedness.

16 We have not dragged our feet. We have not permitted
17 the size of the problem to stop us; neither have we indulged in
18 irrational and illogical fears. But we do maintain that the
19 Commission has not had an accurate picture of our situation
20 until today. That, we believe, is the result of an
21 administrative process that never dealt equitably with the
22 people who knew best and had the planning responsibility.

23 I recall with some bitterness and frustration,
24 sitting through a meeting which gave Boston Edison four hours
25 of testimony time, and gave the Town of Plymouth two minutes,

1 and those two minutes in the closing hours just before
2 adjournment. But that has been the usual tenor -- long days of
3 technical review, with perfunctory attention to the public and
4 little attention to emergency planning.

5 There has never been, to our knowledge, an NRC
6 meeting in Plymouth which was devoted to emergency Plymouth,
7 yet thousands of hours went into the technical reviews of the
8 Pilgrim Nuclear Power Stations, and several public meetings
9 were held by technical NRC staff. We consider that a sad ratio
10 of concern. The only NRC hearing on emergency planning was
11 held here in Rockville on October the 14th of this year.

12 To the consternation of Plymouth, we were not even
13 invited to testify. Our Civil Defense Director, who
14 nevertheless journeyed to your meeting, was not permitted to
15 speak. Yet, Boston Edison had been invited to give -- and this
16 is your quote -- "current understanding," -- close quote -- of
17 the status of radiological emergency planning in the EPZ towns.
18 What did you expect? An objective and a dispassionate view
19 from a utility that had been off-line for two and one half
20 years, and was petitioning to go back on line, and had expended
21 millions of dollars?

22 Why was Boston Edison supposed to be a better source
23 of information than those of us who had the responsibility for
24 developing and operating the emergency plans. Credibility is
25 indeed stretched by such a process. As you know, the Town of

1 Plymouth challenged the accuracy of much of the factual
2 testimony presented at your October 14 meeting -- particularly
3 pages 76-103 in the transcript.

4 Perhaps even more importantly, we question the
5 underlying assumptions and conclusion. They deny the reality
6 as we know it. After the October 14, 1988 meeting, two NRC
7 staffers visited the Plymouth Emergency Operations Center in
8 the Plymouth Memorial Building. In the past three years, they
9 have been the only NRC staffers in the planning area, who ever
10 visited our EOC or ever consulted with us.

11 Even those two staffers did not have time to thumb
12 through any of draft plans. Not a volume from our three-foot
13 shelf was opened. We find those circumstances extraordinary in
14 the face of our vulnerability to disaster. In these fifteen
15 minutes, I've tried to bring you the truth of what exists in
16 Plymouth.

17 I have not, because of limits of time, been able to
18 give you much beyond the general picture. I've not even been
19 able to deal with the threat of radiological accident to land
20 and property, currently assessed at \$2 billion in Plymouth
21 alone. I sincerely hope, however, I have conveyed to you the
22 unanimous position of the Plymouth Board of Selectmen -- the
23 Pilgrim Nuclear Power Station ought not be permitted to restart
24 until there are effective radiological emergency response plans
25 which have been approved and tested.

1 Our's is a solemn responsibility to protect and
2 uphold the public safety. We are not prepared, nor ready to do
3 that in the event of serious emergency at the Pilgrim Nuclear
4 Power Station. Essentially, emergency planning decides who
5 will deal with the disaster and how they will operate. It
6 also, by its timeframe, may decide who will live and who will
7 die.

8 These are not merely pieces of paper developed
9 according regulations. They are blueprints for survival. At
10 this critical moment in the history of a troubled Pilgrim with
11 a capital "P," all the other 45,000 small pilgrims with a small
12 "p," the citizens of our precious historic town, are not
13 protected by completed or approved or tested emergency plans.
14 Let the record show clearly that those of us sworn to uphold
15 the public safety of the Town of Plymouth, have so advised the
16 Nuclear Regulatory Commissioners.

17 If, in the face of our arguments, you decide to
18 restart the Pilgrim Nuclear Power Station before we are ready
19 to protect our own citizens, then you must understand that you
20 have overridden the judgment of the traditional local authority
21 in the public safety area. If that happens, it will be you who
22 will be held accountable.

23 Your's is a awesome responsibility. Thank you so
24 much for this opportunity.

25 CHAIRMAN ZECH: Thank you very much, Ms. Thompson.

1 Questions from my fellow Commissioners? Commissioner Roberts?

2 COMMISSIONER ROBERTS: No.

3 CHAIRMAN ZECH: Commissioner Carr?

4 COMMISSIONER CARR: I have some questions. Please,
5 you said your road network had gridlock under normal
6 conditions. How do you define gridlock and when does it occur
7 and how long does it last?

8 MS. THOMPSON: Yes, gridlock is, of course, when
9 traffic comes to a halt because there is --

10 COMMISSIONER CARR: Stopped or slowed down?

11 MS. THOMPSON: Stopped really. Gridlock is stop as
12 far as I am concerned. Slow moving -- it's that very often, of
13 course, given our conditions. How long?

14 Sometimes it is a matter of ten minutes; sometimes
15 it's a matter of one hour, depending on what the conditions on
16 the road are. Even snow, you see, blows across the road, and
17 we have great difficulty. The expressway is our best.

18 COMMISSIONER CARR: But it's not 7-9:00 in the
19 morning, and 3-5:00 in the afternoon?

20 MS. THOMPSON: Yes, it could be. In the summertime
21 particularly, everyone who is traveling toward Boston or Cape
22 Cod, or course, tunes in and gets the news there. You see, we
23 also are faced with only two bridges over Cape Cod, and that
24 stops us in going in that direction, and that highway leads in
25 that direction, as well as to Boston -- highly traveled, and in

1 the summertime, more than the road can take.

2 COMMISSIONER CARR: You've hired your Civil Defense
3 Director, and you say he's only been there a year, but he was a
4 volunteer for a number of years before?

5 MS. THOMPSON: Yes, he was.

6 COMMISSIONER CARR: How many what we call full-time
7 equivalents -- how many assistants does he have?

8 MS. THOMPSON: None. Am I correct Mr. Hadfield?

9 MR. HADFIELD: [Nods head affirmatively.]

10 COMMISSIONER CARR: What kind of a budget does he
11 have?

12 MS. THOMPSON: Mr. Hadfield, would you perhaps answer
13 that one, please?

14 MR. HADFIELD: The budget for the Town of Plymouth
15 now is approximately \$3,000.

16 COMMISSIONER CARR: For your part of it.

17 MR. HADFIELD: For the operation of the department,
18 which there is a request in for more for this year.

19 COMMISSIONER CARR: You mentioned that you had had
20 continuous poor communications with Boston Electric. Would you
21 amplify that a little bit? Have they not been helpful?

22 MS. THOMPSON: Oh, yes, I said we had continuing poor
23 -- not continuous.

24 COMMISSIONER CARR: Well, kind of discuss continuing
25 poor, so I understand what that means.

1 MS. THOMPSON: Surely. I'm an old English teacher,
2 so you will have to forgive me.

3 [Laughter.]

4 MS. THOMPSON: I'm looking at a file which is in
5 front of me. A year ago, for example, almost to the day --
6 November, a year ago in November, there was at the plant, a
7 series of nine incidents over the weekend, to the point where
8 the vice president, perhaps angry or dissatisfied with what had
9 happened in terms of maintenance and those problems over the
10 week end -- they were not reportable to the NRC, please
11 understand that -- dismissed hundreds of employees. They
12 streamed out of the gates, with which, of course, anybody
13 living near immediately began to call everybody in town.
14 "What's happening? Has there been an accident?"

15 They were streaming out. I want you to know that
16 nobody at the Town Hall was informed. The Civil Defense
17 Director was not informed. The first time that the town was
18 called was 4:00 p.m. in the afternoon, and I was called at
19 6:00. When I was called at that point -- no, I'm sorry. I'm
20 looking at a later -- let me get that.

21 I was called at 3:00 p.m. in the afternoon. It took
22 me three hours to get what the facts were. I had to talk with
23 Mr. Byrd, the Senior Vice President. I had to talk with Mrs.
24 Johnson in the Nuclear Information Office. I talked with Mr.
25 Bought who was happily down at the plant at that particular

1 time, in order to get all the facts of the case. Meanwhile,
2 the community was calling everybody, wondering what had
3 happened.

4 We did not have the information either. After that,
5 we wrote a letter to Mr. Byrd and we said, please do something
6 about this. You've been there for fifteen years. You ought to
7 be able to tell us -- even the non-reportable ones that you
8 think may cause concern, consternation, misinformation -- all
9 of that.

10 He promised to do that, and said, we will inform you
11 directly. I'm looking at his letter of December 17, 1987, and
12 here it is last month, in November of 1988, there was some
13 spillage of 2,000 gallons of water with an attendant flow of
14 low level radioactive water to an adjacent parking lot. Guess
15 what? They called the Civil Defense Director in the morning at
16 11:00. That was fine.

17 Now, he knew what the procedure was, so his
18 presumption was that the Town Hall had been called. It had
19 not. His presumption was that the Chairman of the Board of
20 Selectmen had been called. They had not. Our Executive
21 Secretary was not called until 4:00 p.m. that afternoon. I was
22 called at 6:00 p.m. that night. Meanwhile, a press release
23 had been issued by Boston Edison. We had the same scenario all
24 over again.

25 Should I take my two children and get out of town?

1 Is there some danger? Misinformation, consternation, and the
2 Selectmen and the Executive Secretary feeling totally
3 uninformed, and I must say, at a time like that, it's awful to
4 feel so dumb in your own town, and not to know what has
5 happened.

6 Again, your letter has gone, and we said, please,
7 even when it is not an unusual event, we once again ask to be
8 informed in a timely manner, and certainly before the issuance
9 of a press release to the media. We have instructed our Civil
10 Defense Director as to how to proceed in this matter, but we'll
11 look forward to a resolution of the communication problem.
12 That's where we are, and that was last month.

13 COMMISSIONER CARR: I understand that. I think we
14 ought to let the record show that Mr. Byrd hasn't been there
15 for fourteen years -- fifteen years. The plant has maybe, but
16 he's just been there a while. Right?

17 MS. THOMPSON: Well, there sure have been other men
18 who were responsible and in charge.

19 COMMISSIONER CARR: You mentioned -- I think my pre-
20 note said that your emergency plans were all in draft form, but
21 I thought you said the hospital didn't have a draft plan?

22 MS. THOMPSON: It doesn't even have a preliminary,
23 but you understand that we have -- the Civil Defense Director
24 has drafted something to assist them, and hopes that they will
25 look at it, make their emendations and then come through with

1 something that they can accept.

2 COMMISSIONER CARR: So there is a draft plan for the
3 hospital; it's just they haven't approved it; is that accurate?

4 MS. THOMPSON: They haven't processed it.

5 COMMISSIONER CARR: You mentioned that FEMA had only
6 given it a technical review. What other kinds of reviews
7 should they get?

8 MS. THOMPSON: Actually, in the past --

9 COMMISSIONER CARR: I don't understand.

10 MS. THOMPSON: -- they approved it; did they not, Mr.
11 Hadfield.

12 COMMISSIONER CARR: I guess I don't understand what a
13 technical review is.

14 MS. THOMPSON: Sure. All right. Mr. Hadfield?

15 MR. HADFIELD: Our understanding of a technical
16 review is that they will look at this, go through it and decide
17 whether this follows what they feel is good procedure. But the
18 only thing that they have had, is the draft plan, and they
19 describe it in NUREG 0654, not the implementing procedures.
20 They have seen none of the implementing procedures.

21 COMMISSIONER CARR: But they were satisfied with the
22 draft plan --

23 MR. HADFIELD: They had problems --

24 COMMISSIONER CARR: -- from a technical standpoint.

25 MR. HADFIELD: From an technical standpoint, they had

1 problems with even the original draft plan, and that draft plan
2 is not in draft 7, which they have not seen the draft 7 of.

3 COMMISSIONER CARR: In your implementing procedures,
4 does the state have a responsibility in those procedures?

5 MR. HADFIELD: Yes, they do.

6 COMMISSIONER CARR: In addition to the locals?

7 MR. HADFIELD: Yes, they do.

8 COMMISSIONER CARR: Are they aware of their
9 responsibility?

10 MR. HADFIELD: Yes, they are.

11 COMMISSIONER CARR: Also, it's been mentioned a
12 Master Draft Plan. What's that?

13 MS. THOMPSON: No, I think perhaps you are confusing
14 the comprehensive planning of our community -- the growth plan
15 of our community with civil defense plans.

16 COMMISSIONER CARR: So there is no -- that's a term
17 that --

18 MS. THOMPSON: No, that's the plan we use for
19 comprehensive planning growth.

20 COMMISSIONER CARR: Are your training plans working?

21 MR. HADFIELD: The ones that have been undertaken so
22 far are being accepted fairly well. The problem is that they
23 are not even half completed, and some departments have not even
24 started their's yet.

25 COMMISSIONER CARR: But some training is ongoing?

1 have two to three days notice that you don't even open the
2 schools if you know there's a hurricane coming. So, you don't
3 even have that situation at that point.

4 COMMISSIONER CARR: To what timeframe do you feel
5 constrained to plan this one under?

6 MR. HADFIELD: We have to make planning on a short-
7 term --

8 COMMISSIONER CARR: Two hours? Six hours? Two days.

9 MR. HADFIELD: The possibility of two to six hours
10 possibly.

11 COMMISSIONER CARR: I don't have any other questions.

12 CHAIRMAN ZECH: Thank you very much. Commissioner
13 Rogers?

14 COMMISSIONER ROGERS: Just to try to get a little
15 understanding of your level of effort, did you say your budget
16 is -- the civil defense budget is \$3,000?

17 MR. HADFIELD: At the moment.

18 COMMISSIONER ROGERS: That's without salaries?

19 MR. HADFIELD: That's correct, that's without
20 salaries.

21 COMMISSIONER ROGERS: Well, what would it be with
22 salaries -- without -- if there's only one salary, you don't
23 have to tell me.

24 [Laughter.]

25 MR. HADFIELD: That and a 25-hour a week clerk.

1 MR. HADFIELD: Yes, it is.

2 COMMISSIONER CARR: Why isn't the training -- the
3 other departments; why haven't they started, I guess is the
4 question?

5 MR. HADFIELD: Well, one of the departments, for
6 instance, is the school department which just started training
7 this past Monday. The Elementary School Departments -- it's
8 two separate school departments in the Town of Plymouth. One
9 is a regional which takes in the intermediate school and the
10 high schools, and the other is an elementary school system, and
11 it's under two separate committees.

12 The Elementary Committee decided to start training
13 without acceptance of the plan, knowing that the training was
14 based on the plan, but realizing that there were probably
15 problems that would come up in the training; and there have
16 been problems found in the training.

17 COMMISSIONER CARR: But as you said, you've lived
18 with hurricanes and natural disasters for years, so you
19 obviously had some plans to evacuate schools in those cases.

20 MR. HADFIELD: That is an entirely different type of
21 situation. You are not under the threat of the timeframe, and
22 you are not -- in a hurricane situation --

23 COMMISSIONER CARR: What timeframe are you working
24 under?

25 MR. HADFIELD: In a hurricane situation, you usually

1 MS. THOMPSON: Part-time clerk -- that's all we have.

2 COMMISSIONER ROGERS: You have a part-time clerk, and
3 you're full-time?

4 MR. HADFIELD: Yes.

5 COMMISSIONER ROGERS: What is the town's total public
6 safety budget?

7 MS. THOMPSON: I'm sorry, I didn't bring those
8 figures.

9 COMMISSIONER ROGERS: Well, roughly?

10 MS. THOMPSON: I don't really want to say, because I
11 don't know. I'd have to add three departments together, and
12 offhand, I don't know what those are.

13 COMMISSIONER ROGERS: What's the town's total budget
14 without the school system?

15 MS. THOMPSON: \$52 million.

16 COMMISSIONER ROGERS: \$52 without the school system?

17 MS. THOMPSON: Oh, without the school system -- no,
18 I'd have to cut that down by, well, the school takes
19 approximately 53 percent of that or a little more than 53
20 percent of that at the moment, and it is rising.

21 COMMISSIONER ROGERS: Is your emergency planning
22 essentially an effort of volunteers?

23 MS. THOMPSON: Yes.

24 COMMISSIONER ROGERS: Is that how it's carried out?

25 MR. HADFIELD: It has been in the past, and the

1 department is run with myself, the part-time secretary and
2 volunteers.

3 COMMISSIONER CARR: I assume the utility provides
4 some help to you?

5 MR. HADFIELD: We would hope that they would?

6 COMMISSIONER CARR: But they haven't?

7 MS. THOMPSON: They do.

8 MR. HADFIELD: Financial help, yes. Yes, they have -
9 -

10 MS. THOMPSON: And equipment.

11 MR. HADFIELD: Yes, planners as well.

12 COMMISSIONER ROGERS: Are they all part of this -- is
13 this part of this \$3,000 budget?

14 MR. HADFIELD: No.

15 COMMISSIONER ROGERS: Or is that something in
16 addition?

17 MR. HADFIELD: That's in addition.

18 COMMISSIONER ROGERS: Isn't it important to try to
19 make clear what the total expenditure is of your planning
20 efforts, so that we have some -- when you say \$3,000 for your
21 total civil defense effort, then if there's more, it would be
22 nice to know how much more there is that's going into that.
23 That seems like that's a very low level of effort for something
24 that you're so concerned about.

25 MS. THOMPSON: Mr. Rogers, the Town of Plymouth has

1 never considered the resources of Boston Edison as part of
2 their budget, and I would tell you that even in the case of the
3 planners, we have cautioned Mr. Hadfield again and again -- all
4 assistance possible from all quarters, of course. That makes
5 sense, but no planner from Boston Edison or anybody else is
6 going to come in and put a plan on the table that they dreamed
7 up and developed, because it is we who must live with that.

8 That is only a starting point. It's only one of our
9 resources. Mr. Hadfield knows he's in trouble if he ever
10 presents to any department, that which came out of somebody
11 else's head, because he is the expert in civil defense in
12 Plymouth, and we expect him to utilize the resources, but to
13 come out with a plan which is uniquely our's which has a chance
14 of working.

15 We have never considered, while we take help from all
16 quarters -- the state, from Boston Edison -- grateful to get
17 it. On the other hand, we have to do our own particular work
18 on it, and it would not be acceptable to our police chief or to
19 our fire chief or to anybody else to accept somebody else's
20 dreamed-up plan. Sometimes those people don't even have any
21 practical experiences in the planning area. They're doing it
22 from textbooks, and that's not acceptable. We have to do it
23 from experience as well as from the textbook.

24 COMMISSIONER ROGERS: Thank you.

25 CHAIRMAN ZECH: Commissioner Curtiss?

1 COMMISSIONER CURTISS: Just a quick couple of
2 questions. What is the status of your implementing procedures
3 for the fire and the police?

4 MR. HADFIELD: They have gone before the RERP
5 Committee. They are to go before the Board of Selectmen.

6 COMMISSIONER CURTISS: Are they pending now before
7 the Board of Selectmen?

8 MR. HADFIELD: They will -- they are not pending at
9 this moment before the Board of Selectmen, no, but they will
10 be.

11 COMMISSIONER CURTISS: What is the status of the IPs
12 for the schools?

13 MR. HADFIELD: The schools has not even gone to the
14 RERP Committee yet, because it has not been approved by the
15 School Committees.

16 COMMISSIONER CURTISS: Implementing procedures,
17 though, have been drafted for all three of those?

18 MR. HADFIELD: Yes.

19 COMMISSIONER CURTISS: What is your judgment as the
20 Civil Defense Director, of the adequacy of those procedures?

21 MR. HADFIELD: I have to go along with what the
22 department head has felt is his opinion that he can live with
23 these particular procedures that we've worked on together.

24 COMMISSIONER CURTISS: Ms. Thompson, do you have any
25 views on whether a full scale exercise of your procedures is

1 necessary before you all will be comfortable with emergency
2 preparedness?

3 MS. THOMPSON: Certainly that would be the highest
4 level of being comfortable. Actually, it could be tested in
5 many ways, but at the moment, we really have no kind of testing
6 that's been applied.

7 COMMISSIONER CURTISS: One final question -- what is
8 the schedule that you have in place or anticipate for the
9 completion of your effort?

10 MS. THOMPSON: Well, I can only answer that by saying
11 how many months did you think the plant was going to be off-
12 line, or did you have to evaluate work and look again, and
13 again, and again? The plans will be done when they have moved
14 through that careful process, and we have approved them and
15 believe them to be effective. Anything else would be an
16 artificial goal towards which you push people without the
17 necessary thought process.

18 CHAIRMAN ZECH: I presume the Town of Plymouth has
19 been involved in previous emergency exercises and drills in the
20 past since the plant has been operating since 1972? You have
21 been involved in those exercises?

22 MS. THOMPSON: Yes, we have.

23 CHAIRMAN ZECH: How would you characterize the tests
24 that have already been conducted in the past?

25 MS. THOMPSON: The English teacher gives them a C-,

1 sometimes D+.

2 COMMISSIONER CARR: That's a passing grade.

3 MS. THOMPSON: In the area of public safety, you like
4 that? I don't like those chances.

5 CHAIRMAN ZECH: But you have participated?

6 MS. THOMPSON: Yes.

7 CHAIRMAN ZECH: They have been --

8 MS. THOMPSON: They were not very realistic to my way
9 of thinking. I've been in command post exercises; you've been
10 in many, and some of the rest of you. They were not very
11 realistic. They were bubbly, upbeat kinds of things --
12 frankly, I thought mostly public relations.

13 CHAIRMAN ZECH: Do you think that what has taken
14 place here in the recent year or so; would you characterize the
15 ability for emergency planning as improved over what it was in
16 the past?

17 MS. THOMPSON: Certainly.

18 CHAIRMAN ZECH: You say you've come a long way, and
19 you have a long way to go, and we appreciate that, but I would
20 hope that you would continue to put forth the effort that you
21 obviously indicate, Ms. Thompson, you are putting forth to
22 continue to improve and to continue to try to make those plans
23 as good as you can for your community. I'm sure that's what
24 you want to do.

25 MS. THOMPSON: Of course.

1 CHAIRMAN ZECH: Also, I know we've talked about this
2 before and you brought it up to, about handling other types of
3 non-nuclear emergencies in your area, and I for one know that
4 you have a reputation for being quite good at that. Could you
5 tell us perhaps, and maybe Mr. Hadfield would be better to tell
6 us about your handling of non-nuclear emergencies. I'm
7 thinking about the policemen, the firemen and so forth --
8 hurricanes, the floods perhaps some other heavy accident in the
9 area of some kind.

10 What do you think is your community's ability to
11 handle those kinds of accidents?

12 MR. HADFIELD: I think we're in pretty decent shape
13 in that kind of thing, because it's something that we can plan
14 on in advance knowledge if there is something like that coming,
15 and we've done it in the past. We've had very good cooperation
16 between the police, the fire, the schools for opening shelters
17 and things like that. I think in that respect, we are in
18 pretty decent shape, for something of that nature. But you're
19 not talking on the same vein as a nuclear problem.

20 CHAIRMAN ZECH: All right. Thank you very much. Any
21 other questions from my fellow Commissioners before we proceed?

22 [No response.]

23 CHAIRMAN ZECH: Ms. Thompson and your colleagues, we
24 thank you very much for being with us today. We appreciate
25 your being with us.

1 MS. THOMPSON: Commissioner Zech, we're so grateful
2 that you permitted us to be here. Thank you so much.

3 CHAIRMAN ZECH: Thank you again.

4 COMMISSIONER ROGERS: We wish that everyone who
5 appeared here would be as articulate as you.

6 MS. THOMPSON: Thank you.

7 CHAIRMAN ZECH: We call Patricia Dowd, please, who is
8 the Chairman of the Board of Selectmen of Duxbury,
9 Massachusetts. Ms. Dowd, welcome, and you may proceed.

10 MS. DOWD: Good afternoon. I have with me today, Mr.
11 Carl O'Neil, our Civil Defense Director.

12 Chairman Zech, and members of the Commission, I
13 appreciate the opportunity to speak today on behalf of my
14 colleagues on the Board of Selectmen and the residents of
15 Duxbury. This is the first time any member of my Board or for
16 that matter, any public official from Duxbury has been invited
17 to provided information on the status of emergency planning in
18 our town.

19 In the testimony given on October 14th, there was
20 clearly an implication that NRC staffers enjoyed a close
21 working relationship with local selectmen and appointed
22 planning officials. Unfortunately, that has not been the case
23 with the Town of Duxbury. Dr. Bellamy did visit our EOC after
24 the September hearing in Plymouth, in order to assess the
25 radiation protection factor in the building.

1 We are still waiting for a written opinion on that
2 issue. In addition, two NRC staffers met with our Civil
3 Defense Director on October 26th, 12 days after your hearing,
4 in order to discuss the status of our planning efforts. I do
5 not consider this a fair amount of interface with local
6 officials.

7 We also have come a long way. Considerable progress
8 has been made in upgrading our plans and procedures, however,
9 we are continually frustrated when that progress is repeatedly
10 misrepresented as an indication that those plans and procedures
11 could be implemented in the case of an accident. Gentlemen,
12 draft plans and draft procedures which are not reviewed,
13 revised and approved cannot be implemented.

14 As selectmen, we not only recognize that emergency
15 planning is our responsibility -- one we share with the
16 Commonwealth of Massachusetts -- but we take this
17 responsibility seriously. If, after presenting an accurate
18 analysis of our planning status and restating our position that
19 the Pilgrim Nuclear Power Station should not restart until
20 plans and procedures are approved and tested, you decide in
21 favor of restart, the responsibility will have to be your's in
22 the event of an accident.

23 The emergency response planning process in Duxbury:
24 as our confidence in Boston Edison diminished and the risks at
25 the plant became evident, Duxbury took a good look at the

1 emergency response plan and recognized that it could never be
2 implemented in its current form. We withdrew our approval of
3 that plan, as did FEMA in 1987.

4 Duxbury appointed the Radiological Emergency Response
5 Plan Study Committee to work with department managers to
6 develop a viable, workable plan. In the past two years, these
7 officials and volunteers have expended an exorbitant amount of
8 time to accomplish that task. Duxbury's draft plan, excluding
9 implementing procedures, was forwarded to the Commonwealth and
10 subsequently to FEMA for technical review only.

11 There is a four-stage process in the development and
12 approval of our implementing procedures, or IPs. First, the
13 drafts are received by Boston Edison and revised by the
14 appropriate manager. Second, the revised drafts are reviewed
15 by all the managers and revised as many times as necessary.

16 At this stage, the school procedures are also
17 reviewed, revised and ultimately approved by our school
18 committee. Three, the IPs are reviewed by the RERP Study
19 Committee. At this stage, information on supplemental
20 resources needs to be available. Recommendations are made by
21 that Committee to the selectmen.

22 Four, the Board of Selectmen review all segments of
23 the plan and either approve or request additional revisions.
24 There are 38 implementing procedures for Duxbury. Of these, 35
25 have been developed and are currently in the second stage of

1 the process. Four of the 35 have undergone review, but still
2 have unanswered questions. The school procedures are under
3 review, but have not yet been presented to the school
4 committee.

5 The RERP Study Committee has not completed their
6 review of any of the procedures, and in fact, has not received
7 most of them. None of the IPs have been submitted to the Board
8 of Selectmen for review and approval. This progression takes a
9 considerable amount of time, but it is the core of the planning
10 process, and must be accomplished in order to achieve our goal
11 of developing a viable plan.

12 Although none of the procedures have moved through
13 all four phases, this process is approximately 15-20 percent
14 complete in total. The implementing procedures, contrary to
15 the testimony given on October 14th by Dr. Bellamy, have not
16 been forwarded to the Commonwealth or to FEMA. Introductory
17 training has begun in the areas of radiation, dosimetry and
18 decontamination only.

19 Training cannot begin on those IPs unique to Duxbury
20 until the IPs are revised. Completion is estimated at one half
21 of one percent by our Civil Defense Director. Duxbury does not
22 have a designated, approved reception center. If we were
23 forced to implement a plan at this time, we would be
24 implementing a plan absent its most critical component -- a
25 destination point for the evacuating public.

1 The center currently under consideration by the state
2 is not equipped at this time, and is unacceptable to Duxbury.
3 Unique characteristics of Duxbury which present obstacles in
4 obstacles in emergency planning: Duxbury has approximately 150
5 miles of public roads. Outside of limited access, Route 3, and
6 state routes 14 and 3-A, local streets are rural, narrow,
7 curved, and are not designed to accommodate traffic generation
8 of anywhere near evacuation capacity.

9 Duxbury Beach, inclusive of Gurnet and Saquish, is a
10 seven-mile barrier spit from which exiting traffic is limited
11 to Gurnet road and the Powder Point Bridge. No viable,
12 manageable system of moving an estimated 9,000 person from this
13 facility exists. Procedures uniquely suited to this resource
14 and its limited access are central to a credible emergency
15 response plan. Development of these procedures is incomplete,
16 if not in its infancy at this time.

17 Specifics relating to the beach issues will be
18 presented later with the state's testimony. Thirty-three
19 percent of the population of Duxbury consists of 0-18 year
20 olds, with approximately 3,100 students enrolled in the public
21 schools. Busing capability available through the town of
22 Duxbury permits relocation of only one third of the school
23 population at any one time.

24 Contrary to testimony given on October 14th, it is
25 currently impossible to transport all students in a single

1 trip. The availability of information on supplemental bus
2 resources is, at best, sketchy. We have been able to identify
3 only one carrier for the town of Duxbury for 12 buses, and that
4 carrier is stationed in the Worcester area, seventy miles away
5 from our town.

6 Additionally, there are three pre-school daycare
7 facilities of significant size, and numerous smaller programs
8 at scattered site locations. Procedures adequate to ensure the
9 safe transit of this under-18 population sector are not
10 finalized. They year 'round population is approximately 14,000
11 in a community characterized as "bedroom," that is, with an
12 adult workforce that is predominantly commuter.

13 An estimated 65 percent of the town's workforce
14 commutes daily to urban employment centers within one to two
15 hours of Duxbury. Adequacy of plans to manage relocation of a
16 dispersed workforce during peak period commute times, for
17 conditions akin to peak periods that would arise from workers
18 attempting to unite and move families during an event, is
19 unknown at this time. Planning response of a dispersed rather
20 than concentrated workforce calls for different transportation
21 management strategies not yet assembled and reviewed.

22 Municipal resources are limited. The Town of Duxbury
23 has devoted maximum possible staff and volunteer service hours
24 to emergency response plan development. The Fire Chief serves
25 as our Civil Defense Director, and all public safety personnel

1 carry ERP responsibilities as ancillary to their daily
2 workloads. BECO has provided emergency operations center and
3 equipment, but training in equipment use, such as the telephone
4 communication system, is inadequate to make the facility
5 functional at this time.

6 Town department heads meet weekly with Boston Edison
7 planners to devote time to ERP development. To suggest that a
8 plan is complete or procedures are at an implementation stage,
9 is woefully premature.

10 Identified needs by the town to complete the planning
11 process: information made available is often erroneous or
12 incomplete, and frequently, the requested information is not
13 available at all. Information needs are: supplemental bus
14 services for transport of school and/or special needs
15 populations; identify the transportation service providers, the
16 number of buses to be available; assurances of driver
17 commitments; allocation of total bus resources for contaminated
18 areas; identification of a viable and acceptable reception
19 center; identification of special needs population, as well as
20 resources to supplement municipal staffing.

21 Resources needed to even consider implementation of a
22 plan for Duxbury are: documented guarantees of additional
23 emergency manpower from State Police, Coast Guard, National
24 Guard and other support agencies; completed training modules in
25 all procedures for all applicable municipal officials and

1 employees; suitable training, demonstrations and tests of all
2 EOC equipment and other components of the evacuation process,
3 including not only the communications system, but TDD
4 provisions for the hearing impaired; auxiliary power for town
5 buildings used for shelters and for the EOC.

6 I am here today to ask for time -- time to complete
7 procedures development in accordance with our four-phase
8 process; to complete training programs that are the only
9 guarantee of making implementation of a written plan a proximal
10 goal; to demonstrate the effectiveness of plans and procedures
11 through a program of field testing exercises.

12 We do not believe that testing in another region is
13 sufficient, and there have not been demonstrations of bus and
14 ambulance drivers for Duxbury, at least not in conjunction with
15 our planning officials. To permit municipal managers to carry
16 our ERP responsibilities without doing so at the expense of
17 other public safety functions. To witness consistent evidence
18 of plant management improvements, safety provisions and good
19 faith efforts on the part of BECO that are long overdue to the
20 communities in the emergency response zone.

21 The water spill incident a couple of weeks back,
22 certainly did not strengthen our confidence in Edison, when I
23 received phone calls personally for residents, before our Civil
24 Defense Director was notified that a newsworthy event had taken
25 place. I was surprised a few minutes ago to hear that Plymouth

1 received notice at 11:00. Our Civil Defense Director was not
2 called until 4:00 in the afternoon.

3 The Duxbury Board of Selectmen are officially opposed
4 to the restart of the Pilgrim Nuclear Power Station until
5 radiological emergency response plans, including procedures,
6 training and resources are approved and tested. Regardless of
7 your decision on restart, Duxbury officials and volunteers will
8 continue to work with Boston Edison to reach our goal of
9 producing a plan which will provide for the health and safety
10 of our residents.

11 As a matter of fact, we have recently accelerated
12 these efforts. I am here today to ask that you give us
13 sufficient time to protect those whose lives will be most
14 affected if Pilgrim is allowed to restart at this time. Thank
15 you.

16 CHAIRMAN ZECH: Thank you very much, Ms. Dowd.
17 Questions from my fellow Commissioners? Commissioner Roberts?

18 COMMISSIONER ROBERTS: No.

19 CHAIRMAN ZECH: Commissioner Carr?

20 COMMISSIONER CARR: Is your interpretation of a
21 technical review only, the same as Plymouth's

22 MS. DOWD: Yes, it is, but Mr. O'Neil might like to
23 answer that.

24 MR. O'NEIL: Yes, I agree with that Plymouth
25 interpretation of it.

1 COMMISSIONER CARR: Even though your plans for
2 implementing procedures are only in draft form, if something
3 happened, would you attempt to use them?

4 MR. O'NEIL: At this time, we are in the position
5 that we couldn't use any plans that haven't even been tested.

6 COMMISSIONER CARR: You wouldn't make the attempt to
7 use them?

8 MR. O'NEIL: We'd use any plans we had available.

9 COMMISSIONER CARR: You would?

10 MS. DOWD: May I give you an example?

11 COMMISSIONER CARR: Sure.

12 MS. DOWD: The Board of Selectmen received a draft of
13 the procedures for the Board of Selectmen, and the Board of
14 Selectmen, you know, are the operating officials in our town.
15 Those procedures were -- did not apply to the situation in our
16 town at all. They did not recognize the fact that we have a
17 town manager who is or would be in private industry, a chief
18 executive officer. He was not even mentioned.

19 They didn't apply at all. Our Board, my Board, could
20 not follow those procedures if something happened tomorrow.
21 We'd have to use our common sense.

22 MS. DOWD: That's semantics. I mean, was there
23 enough guidance there that you knew what to do?

24 MS. DOWD: In those procedures? No, we sent them
25 back. My common sense would be a better judge to me of what to

1 do than that procedure.

2 COMMISSIONER CARR: I'll buy that answer.

3 MS. DOWD: Okay.

4 COMMISSIONER CARR: Do the players that drafted these
5 plans have a part -- did they have a part in their drafting --
6 the people who are going to execute the plans; did they help
7 draft them?

8 MR. O'NEIL: Certain ones did, yes -- not all of
9 them. However, all the players had an opportunity to review
10 them, yes.

11 MS. DOWD: But that's Phase I and II in that process,
12 you know, so that --

13 COMMISSIONER CARR: I understand. You mentioned that
14 only 35 of 38 of the implementing procedures -- are the three
15 missing ones the school procedures?

16 MS. DOWD: No, they are not.

17 COMMISSIONER CARR: What are the three missing ones?

18 MS. DOWD: The school procedures are in the second
19 phase of the process, but not through that phase yet, and have
20 not gone to the School Committee. The three that are not done
21 are the -- the Board of Selectmen sent their's back, as I
22 explained earlier. The Town Manager --

23 MR. O'NEIL: Town Manager and Public Information
24 Officer.

25 COMMISSIONER CARR: Does the state have a major part

1 to play in your implementing procedures?

2 MS. DOWD: Most definitely.

3 COMMISSIONER CARR: How is your training plan
4 working?

5 MS. DOWD: Well, as I explained, we've only had an
6 introduction to training. So far, the training has only been -
7 - right now the ongoing training is in the area of introduction
8 to radiation, dosimetry and decontamination. So, there has not
9 been training in any of the individual implementing procedure
10 areas.

11 COMMISSIONER CARR: When do you expect to start that?

12 MR. O'NEIL: The training that Mrs. Dowd is speaking
13 of has been done by the introduction to radiation, introduction
14 to emergency response and dosimetry and emergency workers in
15 the town. The school hasn't even started that yet. The other
16 implementing procedure training will be starting in the near
17 future.

18 COMMISSIONER CARR: Like this month? Next month?

19 MR. O'NEIL: Hopefully it will start before the end
20 of this month.

21 COMMISSIONER CARR: Okay, in your reception center
22 problem, when do you expect to designate a reception center?
23 Who designates it?

24 MS. DOWD: The state has the Wellesley Center under
25 consideration right now. Duxbury has taken an official

1 position that that's unacceptable to us. I don't know whether
2 our position --

3 COMMISSIONER CARR: Why is that unacceptable to
4 Duxbury?

5 MS. DOWD: Carl, you could probably answer that
6 better.

7 MR. O'NEIL: The feeling that the Town of Duxbury has
8 is, it is a considerable distance, and where it has been in the
9 feasibility stage, we will need answers that will assure us
10 that the population of the Town of Duxbury can be
11 satisfactorily transported that distance to the safe reception
12 center, before it would be a viable site.

13 MS. DOWD: Most of our reservations concern
14 transportation.

15 COMMISSIONER CARR: On the Duxbury Beach area, what
16 are your current regulations for access to that beach?

17 MS. DOWD: What are our regulations?

18 COMMISSIONER CARR: Yes, do you keep -- do you have
19 to get permits to go to the beach?

20 MS. DOWD: Oh, yes.

21 COMMISSIONER CARR: How many permits do you --

22 MS. DOWD: We have sticker permits.

23 COMMISSIONER CARR: How many permits do you issue?

24 MS. DOWD: There were in excess of 3,000 issued last
25 year, last summer. In addition to that, there are two

1 residential areas at the end of that beach.

2 COMMISSIONER CARR: A permit is for how many people?

3 MS. DOWD: Excuse me?

4 COMMISSIONER CARR: How many people is a permit?

5 MS. DOWD: A permit is per car.

6 MR. O'NEIL: In addition to that, the Gurnet/Saquish
7 area is Plymouth, and Duxbury has no control over how many
8 permits are issued out that way.

9 MS. DOWD: In addition to the stickers that we issue
10 to residents, there is also a section of that beach that is for
11 the public.

12 COMMISSIONER CARR: How much parking is there?

13 MR. O'NEIL: Around 2,000 cars.

14 COMMISSIONER CARR: I guess that I don't understand
15 your school bus problem, saying you can only handle a third of
16 the kids at any time. What time does the first bus leave for
17 school and what time does school start?

18 MS. DOWD: We transport all of our school age
19 population in three trips, so that the high schoolers start
20 first at 6:50 in the morning. Intermediate school, I don't
21 know the exact times. The elementary schools go around 9:00,
22 so that we have a group of buses that do three complete trips.

23 COMMISSIONER CARR: Sometime between 6:50 and --

24 MS. DOWD: 9:00.

25 COMMISSIONER CARR: -- 9:00, they get them all to

1 school?

2 MS. DOWD: Yes.

3 COMMISSIONER CARR: Okay, I understand that. You
4 said you had predominantly commuters going out at peak hours --
5 about 9,000 or so of your 14,000. How long does it take them
6 to get in and out? What's the peak hour traffic?

7 MS. DOWD: Sometimes it takes -- my husband works in
8 town. Sometimes it takes him an hour and a half to get to
9 Boston, which is 30 miles away. That's the same route we would
10 have to evacuate by.

11 COMMISSIONER CARR: But he wouldn't have to go that
12 far?

13 MS. DOWD: Excuse me?

14 COMMISSIONER CARR: Most of that is in Boston or
15 getting out of Duxbury?

16 MS. DOWD: No, a lot of it now is getting out of
17 Duxbury. There is one major access road out of our area, and
18 it's Route 3. It's a two-lane highway.

19 COMMISSIONER CARR: What is your budget?

20 MR. O'NEIL: The budget -- the town budget is --

21 COMMISSIONER CARR: I just mean for civil defense or
22 whatever your --

23 MR. O'NEIL: Civil defense is \$420 prorated by the
24 town.

25 MS. DOWD: May I explain that, please?

1 COMMISSIONER CARR: Please.

2 MS. DOWD: Carl is our Fire Chief, and as Fire Chief,
3 he is spending a great deal of his time on civil defense, but
4 his salary is paid out of the fire budget. The other
5 department managers who work with Carl are the Town Manager,
6 the Police Chief, the School Superintendent, the DPW Director.
7 Their salaries are paid out of those individual budgets.

8 We do have monies from Edison. They did contribute
9 toward the building of the EOC center and the equipment. In
10 addition to that, we have funds to hire some consulting people
11 to help with civil defense, and we're in the process of looking
12 to hire someone. But other than our department managers, all
13 of our civil defense work is done by volunteers.

14 COMMISSIONER CARR: So, what do you predict that you
15 will have to spend out of the town's budget to get where you
16 want to go?

17 MS. DOWD: Well, we haven't broken it down to civil
18 defense, because we present our budget as --

19 COMMISSIONER CARR: However --

20 MS. DOWD: I really don't know at this time, but I'd
21 be glad to figure it out and send it to you, if you'd like.

22 COMMISSIONER CARR: I'd appreciate that. You've got
23 to get somewhere, and I just wondered. You say that Boston
24 Electric is helping you solve the problems?

25 MS. DOWD: Yes, they are.

1 COMMISSIONER CARR: Is the state also helping?

2 MS. DOWD: Yes, the state has been working with the
3 civil defense.

4 COMMISSIONER CARR: Are you meeting weekly with the
5 state?

6 MR. O'NEIL: Yes, the local officials are meeting
7 weekly with the state.

8 COMMISSIONER CARR: Has that accomplished a lot?

9 MR. O'NEIL: Yes, it has.

10 COMMISSIONER CARR: Have you taken a look at short-
11 cutting your four-step procedure to maybe speed it up?

12 MS. DOWD: I don't think that's possible, but I will
13 say that right now we are in an accelerated mode. Our training
14 has begun, and we think that will move a lot faster than it has
15 in the past. Now that we have the procedures in hand and have
16 started revising them, we think that will move faster.

17 I don't think there's a short-cut to that four-step
18 process at all. To do so would be to take a plan that we feel
19 would be inferior.

20 COMMISSIONER CARR: One of the things you asked for
21 was time to permit your municipal managers to carry out ERP
22 responsibilities without doing so at the expense of other
23 public safety functions. I understand that now better since
24 you say that there are the Fire Chief and all those other kinds
25 of, so it's a collateral duty with them?

1 MS. DOWD: That's right. Right now, our Fire Chief
2 spends a good deal of his weekly time on civil defense.

3 COMMISSIONER CARR: As far as you can tell, you've
4 got your priorities right then?

5 MS. DOWD: Excuse me?

6 COMMISSIONER CARR: You have your priorities right as
7 far as you can tell us, as attacking this problem?

8 MS. DOWD: Oh, I think so. We're certainly working
9 very hard on it.

10 COMMISSIONER CARR: I was curious. I noticed that
11 one of things that you needed was a LORAN navigation radio.
12 What do you plan to do with that?

13 MR. O'NEIL: That was requested by the Harbor Master.
14 He already has one. In that area, the Harbor gets very foggy.

15 COMMISSIONER CARR: Everybody needs two. I
16 understand that.

17 MR. O'NEIL: There are a lot of people out there in
18 the fog, too.

19 COMMISSIONER CARR: You say that the Gurnet/Saquish
20 area is not one of your problems? That's somebody else's
21 problem?

22 MS. DOWD: Saquish -- the Saquish area, even though
23 it's at the end of Duxbury Beach, belongs to Plymouth.

24 COMMISSIONER CARR: I guess I was curious about the
25 four-wheel drive vehicle. You have a police four-wheel drive

1 vehicle, I would assume?

2 MS. DOWD: We do, but we have always serviced the
3 Saquish area -- out of a moral obligation more than anything
4 else. But our Police Chief has stated, and I think he is
5 correct; they're out on a spit, and for us to take care of
6 those people before our own residents in case of an event,
7 would be unacceptable to the Town of Duxbury.

8 You know, we certainly are going to take care of
9 Duxbury residents first.

10 COMMISSIONER CARR: I understand. I was led to
11 believe your estimate of completing your readiness was February
12 '89. How does that look to you today?

13 MR. O'NEIL: Do you want to answer that or do you
14 want me to answer that?

15 MS. DOWD: The February -- my Board of Selectmen
16 decided that we needed to set up some sort of a schedule in
17 order to be able to judge our progress and to get where we're
18 going.

19 COMMISSIONER CARR: I commend that.

20 MS. DOWD: We asked Carl to come up with a schedule.
21 The February 15th date is a date for everything to come to the
22 Board of Selectmen for their review.

23 COMMISSIONER CARR: What step is that in your four-
24 step process?

25 MS. DOWD: Fourth.

1 COMMISSIONER CARR: That's the fourth step?

2 MS. DOWD: That's the fourth step. We set that
3 schedule, realizing that a lot of what we have to prepare; we
4 need to wait on the state for a lot of that. It was better
5 having a date and a goal, even if that date has to be moved.

6 COMMISSIONER CARR: I understand. Does that look
7 still good to you?

8 MR. O'NEIL: I think it would be very optimistic to
9 expect to attain that goal by February 15th.

10 COMMISSIONER CARR: What if I doubled your budget to
11 \$840?

12 [Laughter.]

13 MR. O'NEIL: I don't believe that would do it.

14 COMMISSIONER CARR: That's all the questions I've
15 got.

16 CHAIRMAN ZECH: Commissioner Rogers?

17 COMMISSIONER ROGERS: Just again to try to get some
18 idea of what forces are actually going into this, what are the
19 dollars available for consultants? You mentioned that there is
20 some money available for consultants. Roughly, what is that?

21 MR. O'NEIL: From Boston Edison?

22 COMMISSIONER ROGERS: I don't care where it comes
23 from.

24 MS. DOWD: \$47,000.

25 COMMISSIONER ROGERS: How much?

1 MR. O'NEIL: \$47,000 for administrative and technical
2 support, and they also financially assist in the training.

3 COMMISSIONER ROGERS: That's underway now?

4 MR. O'NEIL: Yes.

5 COMMISSIONER ROGERS: You're using those funds at
6 that level?

7 MR. O'NEIL: Yes.

8 MS. DOWD: For the training -- we haven't hired a
9 planning consultant yet. We're in the process of looking for
10 one.

11 CHAIRMAN ZECH: That's money from Boston Edison; did
12 I understand that?

13 MR. O'NEIL: Yes. The training is additional to the
14 \$47,000.

15 CHAIRMAN ZECH: Thank you. Commissioner Rogers?

16 COMMISSIONER ROGERS: What's your total town budget
17 did you say?

18 MS. DOWD: About \$23 million. May I add too, in
19 Massachusetts, we operate under the constraints of Proposition
20 two-and-a-half. The Town of Duxbury has reached its taxing
21 capacity. We have reached our levy limit, and might possibly
22 be looking at an override situation next year. That's part of
23 our problem. We simply are not allowed --

24 COMMISSIONER CARR: You're not allowed to grow?

25 MS. DOWD: No, we simply are not allowed to raise,

1 you know, as much taxes as we need to run our town.

2 COMMISSIONER CARR: You better talk to Plymouth.

3 They are growing fast.

4 [Laughter.]

5 CHAIRMAN ZECH: Commissioner Curtiss?

6 COMMISSIONER CURTISS: Just two quick questions on
7 what Mr. Carr raised. The February 15th date; I had understood
8 that to be the date by which you could complete all the
9 procedures, and at the same time, have a drill of the plan
10 undertaken. Is that still the target, and does the fourth step
11 that you envision, come before or after the drill?

12 MS. DOWD: I don't think we'll be finished by
13 February 15th. No, I think that those procedures will
14 probably come to our Board around the middle of February --
15 possibly the middle of March.

16 COMMISSIONER CURTISS: Does the drill take place
17 before or after they come to you?

18 MR. O'NEIL: In that projection, the Town Managers,
19 the department heads, wanted to have some moderate exercises to
20 then adjust the implementing procedures prior to forwarding
21 them to the selectmen. We feel that it's a key issue to at
22 least do some initial exercises with it to find how acceptable
23 they're going to be, before we even attempt to forward them to
24 the selectmen.

25 COMMISSIONER CURTISS: Have you resolved the dispute

1 over early dismissal of school children?

2 MR. O'NEIL: No.

3 COMMISSIONER CURTISS: Is that a dispute that you can
4 resolve, or does the state have to resolve that?

5 MR. O'NEIL: I believe that will be up to the School
6 Committee.

7 MS. DOWD: Well, it will probably be up to the School
8 Committee, but keep in mind that the Board of Selectmen are the
9 ones who ultimately have to approve the whole plan.

10 COMMISSIONER CURTISS: I understood.

11 MS. DOWD: I have a feeling that if the School
12 Committee did not resolve that issue, then the Board of
13 Selectmen will.

14 COMMISSIONER CURTISS: You have the final authority
15 to do that then?

16 MS. DOWD: Yes.

17 COMMISSIONER CURTISS: Thank you.

18 CHAIRMAN ZECH: You've been involved, I presume, in
19 Duxbury, and other officials of Duxbury, in previous emergency
20 exercises regarding the Pilgrim Plant since it's been operating
21 since 1972. Could you characterize your views as to how those
22 exercises have gone, and perhaps the status -- you think
23 whether the efforts you have made have improved or not
24 improved? Could you give us your own characterization, please?

25 MS. DOWD: I was not a member of the Board of

1 Selectmen when those exercises were carried on. Carl might
2 want to add to what I have to say. I understand -- it is my
3 understanding that those exercises were successful, but they
4 were exercises that were done on a plan that FEMA withdrew
5 approval of in 1987.

6 The plan clearly had deficiencies. There have not
7 been exercises on this current plan that we are working on,
8 which is a much improved plan.

9 CHAIRMAN ZECH: Thank you. I know that Duxbury, like
10 Plymouth, also has a history of competence in handling non-
11 nuclear type emergencies. Perhaps you could tell us -- maybe
12 Mr. O'Neil would be the proper one to tell us how you do handle
13 the hurricanes and the flood possibilities or other emergencies
14 in your territory.

15 MR. O'NEIL: Certainly. In the past, we've handled
16 hurricanes and some severe winter storms without serious
17 consequence. We've been able to handle them very well. We, in
18 Duxbury, don't have an extreme area of low level flooding
19 during hurricanes, so that we have never been involved with any
20 major evacuation. That's what we are concerned with in this
21 particular situation.

22 CHAIRMAN ZECH: Thank you very much. Any other
23 questions from my fellow Commissioners?

24 [No response.]

25 CHAIRMAN ZECH: All right. Ms. Dowd, Mr. O'Neil; we

1 thank you very much for being with us today, and for your
2 contribution to this meeting.

3 MS. DOWD: Thank you. We appreciate the opportunity
4 to let you know where we are in planning.

5 CHAIRMAN ZECH: Thank you very much. Next, we'll
6 call Ms. Helen Copello, Administrative Assistant to the Deputy
7 Director of Civil Defense in Carver, Massachusetts. Ms.
8 Copello, did I pronounce that correctly?

9 MS. COPELLO: Yes.

10 CHAIRMAN ZECH: Thank you. Good afternoon,
11 gentlemen. Thank you very much for inviting our town to
12 participate. I'm sorry that Mr. Vezilli couldn't be here, who
13 was our Director, but because of a scheduling mixup, he has
14 told you that I would make his speech for him.

15 CHAIRMAN ZECH: Give him our respects and tell him
16 thank you for allowing you to come.

17 MS. COPELLO: Thank you. In January of this year,
18 the Carver RERP, Radiological Emergency Response Plan, was
19 submitted to the state Civil Defense and FEMA for initial,
20 informal technical review.

21 Comments received by the state and by FEMA have been
22 incorporated into the plan. We have 42 implementing procedures
23 that include town agencies and private facilities. These
24 private facilities are nursing homes, daycares and camps.

25 Our sheltering program has twelve facilities that

1 have been identified and agreed to, and have tone alert radios
2 and sheltering kits in place. We have four public and eight
3 private sheltering areas with a capability of housing our town
4 population.

5 On October 12th of this year, we submitted our plans,
6 procedures and sheltering procedures to Civil Defense and FEMA
7 for another informal technical review. Our emergency operation
8 center is essentially complete. We have some equipment that is
9 still on order and approximately 83 percent of our emergency
10 response personnel for the town have some form of training.

11 We hope to have all our personnel completely trained
12 in the first quarter of next year. Although our communication
13 with Boston Edison and our response capability has greatly
14 improved over the last 18 months, we have no way of knowing
15 whether or not the RERP and implementing procedures will be
16 accomplished until we test our capabilities in announced and
17 unannounced drills, and a full scale exercise has been tested.

18 That's all, gentlemen. I will try to answer your
19 questions if you have any.

20 CHAIRMAN ZECH: All right, thank you very much. We
21 appreciate that. Commissioner Rogers -- Commissioner Roberts,
22 I'm sorry.

23 COMMISSIONER ROBERTS: No.

24 CHAIRMAN ZECH: Commissioner Carr?

25 COMMISSIONER CARR: You seem to have done much better

1 in Carver than others we've heard about today. How do you
2 account for that? Have you got more effort and more FTE's,
3 more budget, more help?

4 MS. COPELLO: No, we just have a small town -- a lot
5 smaller than the rest of them. Our population is only 10,000.

6 COMMISSIONER CARR: It's not that much smaller. You
7 still have to put out the same amount of paper, I would assume?

8 MS. COPELLO: More than likely.

9 COMMISSIONER CARR: There would seem to be some
10 problem in your town of setting up the Decon facility. Would
11 you expand on that a little bit for me?

12 MS. COPELLO: Well, the Fire Department is not
13 willing to do the decontamination, so we are trying to put
14 together volunteers to do our decontamination. We also have an
15 area lined up to do decontamination, but it will not even be
16 started till after the first of the year.

17 What we are doing is taking a building that was part
18 of the DPW&L. When they move out of there, they're going to
19 revamp it to a decontamination area.

20 COMMISSIONER CARR: Have you got any insurmountable
21 problem there, or is it just a matter of time?

22 MS. COPELLO: Well, if everything goes, they hope to
23 have them out of their position sometime in February, which
24 means it can get started. But it's also getting volunteers to
25 come in and help us.

1 COMMISSIONER CARR: I don't want to neglect your
2 budget. How much is your budget?

3 MS. COPELLO: The town budget for civil defense that
4 is voted on by the people is \$1,000.

5 COMMISSIONER CARR: Thank you.

6 CHAIRMAN ZECH: Commissioner Rogers?

7 COMMISSIONER ROGERS: Out of what is your total
8 budget -- town budget?

9 MS. COPELLO: The town budget is \$11 million.

10 COMMISSIONER ROGERS: Thank you.

11 MS. COPELLO: That's including school also.

12 CHAIRMAN ZECH: Commissioner Curtiss?

13 COMMISSIONER CURTISS: No.

14 CHAIRMAN ZECH: Well, I don't know, Ms. Copello, if
15 you've had the experience to know, but perhaps you do know that
16 your town has been involved in these exercises before. Could
17 you characterize how those exercises have gone in the past?

18 MS. COPELLO: I was not in civil defense at the time
19 the exercises were. From what I have gathered from people who
20 have been involved, they were satisfactory, but I couldn't
21 answer you better than that.

22 CHAIRMAN ZECH: All right, fine. All right, thank
23 you very much. Are there any other questions from my fellow
24 Commissioners?

25 [No response.]

1 CHAIRMAN ZECH: Ms. Copello, thank you very much for
2 being with us today. We appreciate your appearance.

3 MS. COPELLO: Thank you.

4 CHAIRMAN ZECH: Next, we'll call on Mr. Robert Reed,
5 the Town Administrator of Kingston.

6 Welcome, Mr. Reed, and you may proceed.

7 MR. REED: Thank you very much. Good afternoon. My
8 name is Robert Reed and I am the Town Administrator of
9 Kingston, Massachusetts. I'm here to offer brief remarks on
10 behalf of the selectmen, the civil defense officials and
11 citizens of the town of Kingston.

12 Kingston is a town immediately to the North of
13 Plymouth, the town in which Pilgrim Nuclear Power Station is
14 located. Kingston has a population of approximately 8,000,
15 and, for the purposes of planning, is included in its entirety
16 within the Pilgrim 10-mile Emergency Planning Zone.

17 Because of the plant's past performance, and the
18 proximity of Kingston to the site, the restart of Pilgrim
19 Nuclear Station is a matter of great concern to the people of
20 Kingston. Last November 8th, the majority of the citizens of
21 Kingston who voted supported a statewide referendum questions
22 which called for no further generation of power by commercial
23 nuclear plants in the Commonwealth, by means of which would
24 result in the production of nuclear waste.

25 At a special town meeting in May of 1987, the town

1 voted to request the Governor and Attorney General of
2 Massachusetts to take whatever legal action appropriate to
3 delay the restart of Pilgrim Nuclear Station until the
4 Massachusetts Department of Public Health completed a study of
5 the cancer incidence in the towns of Plymouth, Kingston,
6 Duxbury, Marshfield and Scituate.

7 Finally, the Kingston Board of Selectmen recorded
8 their official position on restart. They are opposed to the
9 restart of Pilgrim Station until an approved and tested
10 radiological emergency response plan is in place.

11 In July of 1987, the planning process was begun on
12 the Kingston radiological emergency response plan, and since
13 that process was initiated, the plan itself and implementing
14 procedures for it are considerably better than they used to be.
15 Town officials have put in countless hours of planning,
16 training and procedure development.

17 Agency heads, private shelter owners, school
18 officials and volunteers all dedicated a great deal of effort
19 towards completing a draft version of the response plan and
20 detailed implementing procedures consisting of 70-75 checklists
21 and the shelter implementation program. All of these documents
22 were submitted to the state Civil Defense Agency and the
23 Federal Emergency Management Agency for technical review on
24 October 12, 1988.

25 We are awaiting feedback from these agencies as to

1 the appropriateness of format and content of the documents.
2 However, it must be noted that these plans procedures have been
3 approved by the town in concept only, and there remain some
4 planning, procedure and resources problems which must be
5 addressed before formal approval can be considered.

6 For instance, there is the policy of the Kingston
7 Elementary School Committee to dismiss students early when
8 there is a snow emergency. The Committee wishes to follow the
9 same procedure in a radiological emergency, but the policy is
10 at odds with the draft implementing procedures for schools,
11 which instead calls for bringing in buses and conducting a
12 precautionary transfer of school children to host schools
13 outside the area.

14 The School Committee's wishes are also at odds with
15 the recommendation of state and utility planners. Discussions
16 to resolve this issue are underway, but no agreement has yet
17 been reached. In addition, the implementing procedure for
18 Kingston's regional high school is still under review by that
19 School Committee, which includes representatives from three
20 non-emergency planning zone towns.

21 The school itself contains students from outside the
22 Emergency Planning Zone, and specific provisions for the
23 parents of those children have not yet been outlined. There is
24 also a concern for the special needs population of Kingston,
25 and what special measures would be taken for their safety. As

1 yet, identification of the special needs population is
2 incomplete.

3 The Kingston Police Chief objects to some premises as
4 set forth in the traffic management procedures. He feels
5 strongly that no one should be permitted to enter the town,
6 once an evacuation is ordered. His objections conflict with
7 the current evacuation time estimate which states that the
8 borders of the town are not to be controlled for two hours so
9 that residents may get in and out to adjust for their own
10 evacuation needs.

11 The Police Chief feels that this strips him of
12 maximum control of the town and this is another example of
13 procedure in need of attention. Recently, work has begun in
14 the construction of a large shopping mall in southeast
15 Kingston, expected to be completed in 1989. The company
16 developing the mall has proposed and is initiating work on the
17 upgrading of five different traffic intersections to handle the
18 anticipated increase in traffic near the site of the mall.

19 An item like this raises some concern about our
20 radiological emergency response plan. If construction needs to
21 be done all along our roads and intersections reconfigured in
22 order to service an influx of drivers out on a shopping spree,
23 how can we assume the current roads are sufficient and safe
24 enough to handle the volume and type of traffic expected during
25 a nuclear evacuation?

1 The mall is not only the largest project proposed for
2 Kingston, already a rapidly growing area, and traffic
3 congestion is expected to increase each year. A resource
4 concern closely aligned with traffic management, is that
5 additional coordination is required among the Kingston Police
6 Department, the State Police and County Sheriff's office.

7 There is a question as to whether the town police
8 force can manage to staff all of the traffic and access control
9 points assigned to them. Our Police Chief says that there's
10 not enough cruisers to man all the traffic and access control
11 points. School officials are concerned as to whether a
12 sufficient number of bus drivers will respond to evacuate the
13 school children.

14 Recruitment is still needed in order to staff all the
15 civil defense positions at least two deep to ensure 24 hour
16 coverage. We are still in need of an alternate civil defense
17 director to take over when the designated director has done a
18 12-hour shift.

19 The planning process has also uncovered some
20 equipment needs such as functional emergency operations center,
21 traffic and access control equipment, and communications
22 equipment. This equipment is vitally needed in order for the
23 town to protect its citizens.

24 Although the utility has provided a great deal of
25 this equipment, it is not all in place. Other equipment issues

1 still unresolved include the fact that only two telephone lines
2 exist into the Kingston Elementary School, the Regional High
3 School or the School Administration Building.

4 The telephone system at our emergency operations
5 center is not fully operable at this point either. We need
6 pagers for all key people if we want to feel confident we can
7 notify them at any time. We still need public address systems
8 for police and fire vehicles, traffic control barricades, cones
9 and decontamination kits.

10 In addition, it is believed that the number of
11 shelters for transients is insufficient. All these equipment
12 and facilities needs illustrate the overwhelming expectations
13 placed on a municipality's limited resources.

14 Perhaps the most single most important element in the
15 Emergency Response Plan is training. In many departments, the
16 training remains incomplete, or has not yet begun. The Police,
17 Fire and Highway Departments are not yet fully training. No
18 training sessions have been held for the one hundred plus
19 teachers and staff at the Regional High School.

20 At training session was held at the Elementary
21 School, but there was only very light attendance. Our Civil
22 Defense Director is not comfortable that a staff yet exists
23 which is sufficiently trained to coordinate the Emergency
24 Operations Center. There are dozens of nursing home, daycare,
25 camp and civil defense staff yet to train.

1 Many of these people are not yet aware that they
2 would have roles to play in an emergency response plan, and
3 only training can rectify that situation. We recognize that
4 training is an ongoing process and will never be complete, but
5 our concerns are related to training on the implementing
6 procedures.

7 Some people have not been fully informed of their
8 duties within these procedures, and we have no estimates of
9 when the initial training sessions will be complete. Without
10 this basic type of training, we have little confidence in our
11 emergency response plan. Finally, and in agreement with the
12 surrounding towns, the selectmen insist on participating and
13 judging a full test of the plan and procedures.

14 We'd like to see a simulated example of an emergency
15 at Pilgrim Station. We would like to see many facets of the
16 plan demonstrated, notifications, communications equipment
17 tests, state participation, facility operation and a few buses
18 running pickup routes and precautionary transfer routes. Only
19 after a successful test of the plan and implementing
20 procedures, will we feel public safety is well served.

21 One might use the analogy of a football play draw on
22 a blackboard, but never run in practice. We have all the x's
23 and o's, but we have no idea how the team will work together.
24 We do know, however, the team works well together in the
25 planning process, because throughout the process, Kingston town

1 officials and many citizens have worked diligently on the
2 emergency response plan.

3 They've offered their time on it, not in the
4 expectation that it would prevent injury or loss of life, nor
5 that it would guarantee the safety of everyone in Kingston, but
6 in the belief that having a well thought out emergency plan is
7 far better than having no plan at all. They have been largely
8 engaged in an act of faith during this process, and as such,
9 have cooperated with all parties to the best of their ability,
10 but without benefit of the knowledge that the plan really
11 works.

12 We do believe that the state of Kingston's emergency
13 preparedness has been increased by the level of planning that
14 has been accomplished through the efforts of town officials.
15 However, we feel that the issues discussed here regarding the
16 implementing procedures must be addressed; training must be
17 completed; equipment must be put in place, and a full scale
18 exercise must be conducted.

19 We believe that an exercise will be the most
20 realistic manner in which a determination can be made as to the
21 readiness of the Radiological Emergency Response Plan.

22 In view of those sentiments, the Board of Selectmen
23 of the Town of Kingston believes that the Pilgrim Nuclear Power
24 Station should not be allowed to restart until an exercise has
25 been conducted.

1 On behalf of the town of Kingston, I would like to
2 thank you for this opportunity to express the town's view on
3 the status of radiological emergency preparedness for the town.

4 Thank you.

5 CHAIRMAN ZECH: Thank you very much. Questions from
6 my colleagues. Commissioner Roberts?

7 COMMISSIONER ROBERTS: No.

8 CHAIRMAN ZECH: Commissioner Carr?

9 COMMISSIONER CARR: You say that you have no major
10 problems that training couldn't solve, and it seems that most
11 of what you have left is a matter of training and cooperation.
12 What is your budget for Civil Defense, taking care of this
13 problem?

14 MR. REED: Our budget's also -- the civil defense is
15 quite small. It's in the area of four to five hundred dollars.
16 We have received quite a bit of assistance from the utility.
17 We have a grant for a Civil Defense Planner. We received a
18 great deal of equipment for our Emergency Operation Center, and
19 the construction of that center. And I don't see how we, in
20 any way, would have been able to amass the resources that they
21 have put into Kingston. But we're still far away from --

22 COMMISSIONER CARR: So you don't have anybody right
23 now in charge of Civil Defense?

24 MR. REED: We have a Civil Defense Director, but he's
25 only part-time.

1 COMMISSIONER CARR: And he's part-time? Is he a
2 volunteer --

3 MR. REED: Yes. Largely.

4 COMMISSIONER CARR: -- or is it a collateral duty to
5 him?

6 MR. REED: Yes.

7 COMMISSIONER CARR: I was curious, when you said you
8 don't know when you can get your training done. How can you
9 operate without an estimate of some time frame you want to get
10 your training done in? You don't know how many trainers to get
11 or how many people you've got to train?

12 MR. REED: Well, I think we have an idea of how many
13 we have to train, but I think the overall scheduling still
14 hasn't been completed.

15 COMMISSIONER CARR: My curiosity is aroused as to why
16 -- what have you got left to do, or who -- who is responsible
17 for doing that, I guess? As a town administrator, is that
18 part of your responsibility?

19 MR. REED: I would say that's largely the
20 responsibility of our Civil Defense staff.

21 COMMISSIONER CARR: I have no further questions.

22 CHAIRMAN ZECH: Commissioner Rogers?

23 COMMISSIONER ROGERS: What is your process for
24 approval of your plans, your internal process within the town
25 structure itself? How many steps do you have in that? How

1 does that proceed?

2 MR. REED: Well, my understanding, and this is, you
3 know, my understanding. Admittedly, I think, perhaps, for
4 accuracies sake, you may be better off, or your staff may be
5 better off contacting our Civil Defense people.

6 But the plans are reviewed with the various
7 department heads, are people responsible for implementing the
8 various procedures. And they are signed off before they are
9 submitted to the Board of Selectmen for further review.

10 COMMISSIONER ROGERS: What is your town budget, your
11 total town budget?

12 MR. REED: Without schools, approximately \$6 million.

13 COMMISSIONER ROGERS: Without schools. With schools,
14 just on the same basis as the other towns have told us?

15 MR. REED: Yes. Probably about \$11 million.

16 COMMISSIONER ROGERS: Thank you.

17 CHAIRMAN ZECH: Mr. Curtis?

18 COMMISSIONER CURTIS: No, thank you.

19 CHAIRMAN ZECH: Perhaps, Mr. Reed, you could
20 characterize how the previous exercises that have been
21 conducted regarding a Pilgrim's Emergency Planning in your area
22 -- could you characterize how those exercises have been viewed?

23 MR. REED: Previous exercises, I don't believe I
24 could. I've been in Kingston about a year. I've --

25 CHAIRMAN ZECH: You're not able to do that.

1 MR. REED: I wouldn't hazard a guess on that.

2 CHAIRMAN ZECH: All right. Certainly.

3 But from what you tell us, it looks like more
4 training and a little more time is necessary. Is that
5 essentially what you're telling us?

6 MR. REED: Well, I think, right now, the emphasis
7 would be on training and also on an exercise. That has been
8 the emphasis with our Civil Defense Director and also with the
9 Board of Selectmen. And that will give us a prospective on our
10 plan and how well it works.

11 CHAIRMAN ZECH: All right. Thank you very much. Any
12 other questions?

13 [No response.]

14 CHAIRMAN ZECH: All right. Thank you very much, Mr.
15 Reed, for being with us today.

16 MR. REED: Thank you.

17 COMMISSIONER ZECH: We appreciate your appearance.

18 Mr. Daniel McDonald, Vice Chairman of the Board of
19 Selectmen of Marshfield, please. Mr. McDonald, welcome. You
20 may proceed.

21 MR. McDONALD: Thank you, gentlemen. I'd like to
22 introduce our Civil Defense Director, Mr. Dan McGonagle.

23 Commission members, as the Town of Marshfield's
24 representative from the Board of Selectmen, I'd like to thank
25 you for this opportunity to familiarize you with the status of

1 our emergency planning. The emergency planning for Marshfield
2 has been a long, arduous, and incomplete process.

3 Our Emergency Response Committee has worked prudently
4 with Boston Edison personnel and our many public service groups
5 to develop the Emergency Response Plan that suits the needs of
6 our community in the event of an accident at the Pilgrim
7 Nuclear Power Station.

8 Throughout that developmental process, the Board of
9 Selectmen has actively reviewed the plan with comments on a
10 number of occasions. On August 8, 1988, the Board unanimously
11 took action on the current status of the Marshfield Plan, and
12 in a letter to our Emergency Response Committee Chairman, Mr.
13 McGonagle, the Board clearly and in no uncertain terms stated
14 its position relative to the evolving nature of the plan.

15 I would like to read into the record the contents of
16 that letter of August 8, 1988, which is attached to my
17 statement.

18 Dear Mr. McGonagle,

19 The Marshfield Board of Selectmen has revised the
20 draft document titled "Town of Marshfield Radiological
21 Emergency Response Plan for the Pilgrim Nuclear Power Station."
22 We have offered suggestions and have agreed to forward the plan
23 for further review and comment to Massachusetts Civil Defense
24 Agency and F.E.M.A. It must be clearly understood that the
25 Marshfield Board of Selectmen has not approved or endorsed the

1 plan, and we still have major reservations regarding its
2 viability. Realizing that neither the Board of Selectmen nor
3 any other official in town is adequately trained to skillfully
4 evaluate all the merits and deficiencies of this proposal, we
5 feel the time has come for M.C.D.A. and F.E.M.A. to have direct
6 professional input.

7 The issues of greatest concern to the Marshfield
8 Board of Selectmen are as follows:

9 1. The adequacy of evacuation to Wellesley as opposed to
10 Weymouth Air Base or University of Massachusetts in Dorchester
11 or other more appropriate sites.

12 2. Concerns relative to actual traffic flow in a worst
13 case scenario during evacuation.

14 3. Although the plan is specific concerning the
15 Governor Winslow School (within the 10 mile zone), we believe
16 general chaos would occur at other schools as well as with
17 parents rushing to pick up children.

18 4. We need greater clarification of the ongoing
19 training timetable and agenda with more attention given to
20 inevitable personnel changes.

21 5. We have serious doubts regarding the willingness of
22 local unions and other employee union groups to remain at their
23 posts and to cooperate during the evacuation.

24 Under no circumstances can this Board approve this
25 document in good conscience unless and until a written letter

1 of agreement is received from involved employee groups
2 accepting their roles in the evacuation process and their
3 expressed willingness to perform or in the alternative,
4 personnel being provided by B.E.C.O. Additionally, any
5 approval by this Board would require a concurrent endorsement
6 by our yet-to-be-hired "Emergency Response Consultant."
7 Although we agree that the current plan demonstrates a good
8 effort by B.E.C.O., we feel any support for it would be
9 premature at this time.

10 We ask that you forward this draft to the appropriate
11 state and federal officials for their constructive analysis.

12 It's signed Richard E. Levin, Chairman; John
13 MacMahon; and Daniel F. McDonald.

14 The Town of Marshfield has, in every capacity, acted
15 in good faith to address the needs of our community in the
16 event of an emergency at Pilgrim. It was distressing to have
17 read the transcript of the September 29, 1988 "Review of the
18 Proposed Restart of the Pilgrim Nuclear Power Station Meeting
19 held in Plymouth, Mass.," at which time, in his discussion of
20 the plans to date, Mr. Ronald Bellamy can be quoted as saying:

21 "First the Town of Marshfield. The draft
22 implementing procedures, a shelter implementation program and a
23 cost reference of the F.E.M.A.-identified deficiencies with
24 sections of the plans and procedures that address resolution
25 have been approved by the Selectmen . . ."

1 It is important at this time, Commission members, and
2 with all due respect for Mr. Bellamy, to set the record
3 straight. Our position on the status of our plan can be no
4 more succinctly stated than to re-quote our August 8 concerns.

5 And I quote: "It must be clearly understood that the
6 Marshfield Board of Selectmen has not approved or endorsed the
7 plan, and we still have major reservations regarding its
8 viability. Realizing that neither the Board of Selectmen nor
9 any other official in town is adequately trained to skillfully
10 evaluate all the merits and deficiencies of this proposal, we
11 feel the time has come for M.C.D.A and F.E.M.A. to have direct
12 professional input."

13 Mr. Chairman, it must be noted that we in the Town of
14 Marshfield have put our best efforts forward to address the
15 needs of our community for an incident of unknown magnitude and
16 of which there is little understanding or consensus.

17 The position of our Board has been that of cautious
18 diligence. We are deeply concerned that there are remaining
19 major structural concerns within the EPZ as to the procedures
20 necessary to ensure the safety of our school children,
21 waterfront user groups, and the disproportionate number of
22 elderly that have made this zone their home.

23 Furthermore, as Selectmen representing the entire
24 town, I feel it is ludicrous to entertain the notion that the
25 90 percent of the Town of Marshfield that reside or do business

1 outside the EPZ and that have not been addressed in our plan
2 will not react to the deluge of media response to an accident
3 at the Pilgrim Nuclear Power Station.

4 We therefore must join our State Department of Public
5 Safety in calling for protective actions, and I quote, "on a
6 whole town basis." This will provide a conservative margin of
7 safety, and it will avoid confusion regarding which parts of
8 the community need to react.

9 Mr. Chairman, there are other issues on the periphery
10 of the Pilgrim debate that are also of deep concern to the
11 citizens of Marshfield when discussions of re-start occur.
12 Some of these are well documented as major deficiencies in the
13 operation of this facility. We in Marshfield have little
14 technical expertise to assess the management capability of
15 Boston Edison, the reported high cancer incidence in the five-
16 town region, or the reported high risk of failure associated
17 with GE Mark I contaminants like Pilgrim.

18 Mr. Chairman, you and your Commission hold the
19 legislative duty and responsibility to act prudently and
20 responsibly to ensure the uncompromised public health and
21 safety of our citizens as a vital component of re-start
22 considerations.

23 Finally, Mr. Chairman, at this time we must support
24 the overwhelming call from our congressional delegations of
25 Senators Kerry, Kennedy, Congressman Studds, Governor Dukakis,

1 the Massachusetts Department of Public Safety, the
2 Massachusetts Civil Defense Agency, and local officials for a
3 full-scale exercise of off-site plans.

4 A plan that doesn't work is not a plan.

5 Thank you for your sincere concern for the residents
6 of the Town of Marshfield.

7 CHAIRMAN ZECH: Thank you very much. Commissioner
8 Roberts?

9 COMMISSIONER ROBERTS: No.

10 CHAIRMAN ZECH: Commissioner Carr?

11 COMMISSIONER CARR: Yes. Have you hired -- that
12 letter was dated August 8. Have you hired your Emergency
13 Response Consultant yet?

14 MR. McDONALD: No, we have not.

15 COMMISSIONER CARR: What happens to be the problem
16 there?

17 MR. McDONALD: We had no place to put him. Our EOC
18 Center was under construction -- not even under construction at
19 the time, and we expect completion within the next 60 days. In
20 November, we advertised for both an Administrative Assistant as
21 well as a Consultant to review the plan. We, as a matter of
22 fact, on the way down, reviewed the resumes of both today, and
23 we hope to have someone on board by the first of the year, or
24 as soon as the EOC Center is available.

25 COMMISSIONER CARR: Let's say for discussion that he

1 comes on by the first of the year, and on 1 February he
2 approves your plans, does that reassure you -- the Board of
3 Selectmen --

4 MR. McDONALD: Well, ultimately, the Board of
5 Selectmen will approve the plan. We certainly look forward --

6 COMMISSIONER CARR: But you said you're waiting on
7 him.

8 MR. McDONALD: We look forward to professional input.
9 We don't feel qualified to assess what the needs are of an
10 emergency at Pilgrim.

11 COMMISSIONER CARR: Well, it appears to me that
12 you've taken the problem as one to be solved, and that training
13 is a major obstacle left in your town as well.

14 MR. McDONALD: That's right.

15 COMMISSIONER CARR: I realize the Board hasn't
16 approved the plan, and you feel you're inadequate to make the
17 skillful evaluation. With respect to your statement that a
18 plan that doesn't work is not a plan, I would only quote you
19 Webster, which says that a plan is a method of action or
20 procedure. He goes on to say that a plan refers to any method
21 of thinking out acts and purposes beforehand, which you seem to
22 have done. I think we would all agree that any plan is better
23 than no plan usually.

24 Would you use what you have in case of an emergency
25 at Pilgrim?

1 MR. McDONALD: Of course.

2 COMMISSIONER CARR: Are you having weekly meeting
3 with the states?

4 MR. McGONAGLE: We have meetings on Thursday.
5 Meetings are conducted in Area 2.

6 COMMISSIONER CARR: In your town, or --

7 MR. McGONAGLE: No, it's in -- within the area.
8 Approximately 25 to 30 miles away.

9 COMMISSIONER CARR: So it rotates, or is it always
10 the same place?

11 MR. McGONAGLE: Basically, it's in the same location.

12 MR. McDONALD: Our attendance at the meetings has not
13 been -- has not been known to be great. Mr. McGonagle, as our
14 Civil Defense Director, is a full-time worker and a volunteer
15 for the town. And we look forward to these two positions that
16 Boston Edison has made money available to us for.

17 COMMISSIONER CARR: Would you classify state and
18 Boston Electric's aid as helpful?

19 MR. McGONAGLE: Yes.

20 COMMISSIONER CARR: Absolutely necessary?

21 MR. McGONAGLE: Yes.

22 COMMISSIONER CARR: Okay. I might make a comment on
23 your comment about responsibility, as well as Duxbury's and
24 Plymouth's, also. Even if you all approved all those and
25 blessed them, you couldn't relieve us of our responsibility.

1 So I feel that very strongly, no matter what. That's all I
2 have.

3 CHAIRMAN ZECH: I think we all do. Commissioner
4 Rogers?

5 COMMISSIONER ROGERS: Yeah. What is your Civil
6 Defense Budget, and what's your town budget?

7 MR. McDONALD: Our Civil Defense budget is \$2,000.
8 It includes salaries. And town budget is approximately \$30
9 million.

10 COMMISSIONER ROGERS: Thank you.

11 CHAIRMAN ZECH: Commissioner Curtis?

12 COMMISSIONER CURTISS: What's your total population?

13 MR. McDONALD: Twenty -- approaching 25,000.

14 COMMISSIONER CURTISS: What share of that is within
15 the ten mile EPZ?

16 MR. McDONALD: Approximately ten percent and we have
17 a build-out analysis of approximately double that figure.

18 CHAIRMAN ZECH: Mr. McDonald, could you characterize
19 the past emergency drills that you had and emergency exercises
20 you have had regarding the Pilgrim emergency plan in the past.

21 MR. McDONALD: In regards to Pilgrim?

22 CHAIRMAN ZECH: Yes.

23 MR. McDONALD: Mr. McGonagle, do you want to answer
24 that?

25 CHAIRMAN ZECH: Either one of you.

1 MR. MCGONAGLE: In comparison, over the past 18
2 years, my experience has been, we've been very successful in
3 handling various emergency type situations. However, I feel
4 necessary to point out, dealing with an incident at Pilgrim
5 would be quite different than what we've experienced in the
6 past.

7 For example, in the blizzard of '78, Hurricane
8 Gloria, we had a lot of people come forward to help us out.
9 They did participate. We were grateful for that. But I don't
10 strongly feel that we would have those types of people come
11 forward in the event of a nuclear --

12 CHAIRMAN ZECH: But in the past, exercises have been
13 conducted in the Pilgrim Plant. In the past, emergency
14 planning exercises have been conducted. Has the Town of
15 Marshfield participated in those exercises?

16 MR. MCGONAGLE: Yes, sir, they have.

17 CHAIRMAN ZECH: And how would you characterize those
18 exercises?

19 MR. MCGONAGLE: Good.

20 CHAIRMAN ZECH: Okay. Thank you. Any other
21 questions?

22 COMMISSIONER CARR: Yes. I might add one comment
23 with respect to your last one there about helping in a time of
24 emergency. I refer you to the major fire they had in the
25 Springfield in the chlorine production facility, which you

1 might review that. And they seemed to get a lot of help, no
2 matter that it was a hazardous situation. So, it might
3 reassure you what people do in the case of a real emergency.

4 MR. McDONALD: We have a problem already standing in
5 that at the time of this August 8 meeting, our Department of
6 Public Works attended and issued a statement that said that
7 they would have no part of any part of an incident at Pilgrim.

8 COMMISSIONER CARR: Is that a town department or a
9 state department?

10 MR. McDONALD: It's a town department.

11 COMMISSIONER CARR: Do you have control over that?

12 MR. McDONALD: Within reason.

13 I think the other point that's important to make is
14 that we have not gone through any training as of yet, and we're
15 waiting for the training modules to be approved by the state.
16 And it's my understanding that they haven't been submitted to
17 the state by Boston Edison. And at that point, I think when we
18 get into the training we'll have a better idea of the types of
19 problems we'll have with other -- other groups that are part of
20 the plan. We've seen some resistance in other communities, as
21 well as in town, relative to schools.

22 COMMISSIONER CARR: But it's your responsibility, as
23 well as Boston Edison, to get those training modules forward,
24 isn't it?

25 MR. McDONALD: We're ready for them, and they're

1 aware of that.

2 COMMISSIONER CARR: But if they didn't give them to
3 you, you'd still have to prepare them?

4 MR. McDONALD: I believe they do the preparation of
5 the training.

6 COMMISSIONER CARR: Thank you.

7 CHAIRMAN ZECH: I believe Ms. Thompson said that she
8 believed that they've come a long way in Plymouth, and they --
9 but they really still have a long way to go. Would you agree
10 that -- and you've told us you have a way to go. We recognize
11 that. Would you agree, though, that you have improved your
12 plan over the plan you had in the past?

13 MR. McGONAGLE: Yes, sir.

14 CHAIRMAN ZECH: It has been improved?

15 MR. McDONALD: The problem that we're concerned with
16 is the problem of the split zone in town. The evacuation area
17 is in the furthest corner to the evacuation route. So we're
18 concerned that, as I suggest, in the event of an incident, and
19 the deluge of media that will take place, there is -- it's just
20 inconceivable to think that the rest of the town will stay put.

21 CHAIRMAN ZECH: All right.

22 MR. McDONALD: That creates a whole host of problems
23 that are not addressed in the plan.

24 CHAIRMAN ZECH: All right. Anything else? Thank you
25 very much. We appreciate you being with us today. Thank you,

1 gentlemen.

2 MR. McDONALD: Thank you.

3 CHAIRMAN ZECH: We will ask Mr. Tom Barlow, the Clerk
4 of the Board of Selectmen of Bourne, and Mr. Charles Noyes, the
5 Civil Defense Director. Welcome, gentlemen. You may proceed,
6 Mr. Barlow.

7 MR. BARLOW: I'd like to thank you for the
8 opportunity to speak today. The town of Bourne -- Bourne is
9 located in Southeastern Massachusetts. It's bordered on the
10 north by Plymouth, east by Sandwich, south by Falmouth, west by
11 Wareham. It's approximately 55 miles south of Boston. It's
12 year-round population is 15,365; summer populations wells to
13 35,000.

14 I'd like to bring your attention to the area within
15 ten miles radius of Pilgrim Power Plant. I have a map attached
16 in this handout. It's that aerial photography done by the
17 County of Barnstable. It shows ten-mile radius to the Pilgrim
18 Plant, going down to 20 miles outside. The town of Bourne is
19 within that ten-mile radius. It's presently eight residences,
20 both seasonal and year-around. In the upper right-hand corner,
21 --

22 CHAIRMAN ZECH: Excuse me. How many?

23 MR. BARLOW: It's eight.

24 CHAIRMAN ZECH: Eight.

25 MR. BARLOW: There is construction under way for a

1 77-units complex within ten miles of the radius. There are
2 future plans for a condominium -- more condominium units in
3 that specific area. We don't know how many at this point.

4 Traffic concerns. The Sagamore and the Bourne
5 Bridge, built in 1935, provide the only means for the public to
6 travel from the Cape to Boston or to other points. Cape Cod
7 has a year-round population of 170,600, and a summer population
8 of just over 500,000. Average daily vehicle traffic across the
9 Sagamore and Bourne Bridges is 64,442.

10 In the event of an incident requiring the evacuation
11 surrounding the Pilgrim Station, the Town of Bourne is not
12 aware of any traffic management plans for this area.

13 Currently, on holiday weekends, the traffic back-up -
14 - and this is not only holiday weekends; it's almost every
15 weekend during the summertime -- there's a back-up of five to
16 ten miles from the Bridges.

17 The Town of Bourne requests emergency planning zone
18 designation. There are several pages here in the handout
19 designating those particular correspondents. I just want to
20 highlight them.

21 CHAIRMAN ZECH: Thank you.

22 MR. BARLOW: On March 6, 1987, Massachusetts Civil
23 Defense Agency offers the Town of Bourne to be designated EPZ
24 community. May 14, 1987, Bourne requests informational meeting
25 with Mass. Civil Defense officials regarding the EPZ

1 designation. May 28, 1987, Mass. Civil Defense acknowledges
2 receipt of the Town of Bourne's request for EPZ designation.

3 June 22, 1987, Bourne received notification that the
4 Governor's office had approved Bourne's request to seek
5 inclusion in the EPZ. August 24, 1987, the Board of Selectmen
6 formally request for inclusion in the Pilgrim EPZ. December 9,
7 1988, the Bourne Board of Selectmen request that the Nuclear
8 Regulatory Commission include Bourne in the Pilgrim EPZ.

9 Present public safety concerns. Presently, Bourne is
10 not notified of incidents at the Pilgrim Station. There was an
11 incident approximately two weeks ago. No one was notified in
12 the Town of Bourne. I called after the incident was given to
13 the general press, and I was told that they would not be
14 notified in the future.

15 Bourne does not have an opportunity to develop
16 emergency plans due to a lack of knowledge of any existing
17 plans. Possibility of panic among citizens and confusion among
18 local officials due to a lack of planning.

19 The Town of Bourne's request. The request by the
20 Town of Bourne to be included in the Pilgrim Station Emergency
21 Planning Zone is made not to condemn or endorse the Pilgrim
22 Power Plant, but rather that Bourne and its residents be
23 adequately prepared for an emergency at Pilgrim's Station.

24 Any questions would be handled by Mr. Noyes. He's
25 the Civil Defense Director.

1 CHAIRMAN ZECH: Thank you very much. We appreciate
2 your being with us today. Commissioner Roberts?

3 COMMISSIONER ROBERTS: No.

4 CHAIRMAN ZECH: Commissioner Carr?

5 COMMISSIONER CARR: On the bridge back-up, I assume
6 that's on Fridays and off on Sundays that that four to five
7 mile back-up is?

8 MR. NOYES: That's when the general problem with the
9 back-up is, yes.

10 COMMISSIONER CARR: To and from the beach on
11 weekends?

12 MR. NOYES: Uh-huh.

13 COMMISSIONER CARR: Is there a back-up everyday?

14 MR. NOYES: Not everyday. There's a traffic slow
15 down during the morning commute to Boston and then the evening
16 return from Boston.

17 COMMISSIONER CARR: In reading your report -- your
18 request of 27 August to be designated an Emergency Planning
19 Zone community, I couldn't help but focus on the paragraph
20 discussing resources, financial and equipment, which would be
21 provided to your community by virtue of this. Do you not now
22 have an alert notification system and a method of public
23 warning in the event of a natural or non-nuclear disaster?

24 MR. NOYES: The only warning system in the Town of
25 Bourne is the fire whistles for the fire department.

1 COMMISSIONER CARR: Do you have any emergency plans?

2 MR. NOYES: We have a comprehensive emergency
3 management plan for the town, yes.

4 COMMISSIONER CARR: Do you train for emergencies?

5 MR. NOYES: There have been service training, both in
6 the police and the fire departments, yes.

7 COMMISSIONER CARR: And it appears to me, when the
8 state said in their 6 March of '87 letter that Boston Electric
9 Company is expected to support the cost of any alert
10 notification and communications equipment which the town must
11 acquire to fulfill its obligations to implement the emergency
12 plan, your interest heightened considerably. Is that a fair
13 statement?

14 MR. NOYES: Well, we -- well, we did, after that, the
15 information was first supplied to us by the state, we asked
16 what Bourne's requirement and commitment would be, what cost
17 would be incurred by the Town of Bourne, and what costs would
18 be recovered by the town from whatever agencies might be --

19 COMMISSIONER CARR: But it's a good deal to be
20 classified -- from a civil defense standpoint, it's a good deal
21 to be classified in EPZ. You get a lot of good gear.

22 MR. NOYES: Well, the main concern is, why should not
23 those 200 -- approximately 200-plus people who live within the
24 ten-mile zone, just because they live in Bourne, not have the
25 same protection those ten-mile people in Plymouth be offered?

1 And that was our main concern.

2 COMMISSIONER CARR: Your request seemed to hinge at
3 first on early notification, from what I've heard from
4 Plymouth. Being in the EPZ doesn't necessarily mean you're
5 going to get early notification.

6 MR. NOYES: Apparently not.

7 COMMISSIONER CARR: But, if -- have you asked Boston
8 Electric to add you to just their notification list without
9 putting you in the EPZ?

10 MR. NOYES: I specifically asked them that, and they
11 told me no.

12 COMMISSIONER CARR: That's all I have.

13 CHAIRMAN ZECH: Commissioner Rogers?

14 COMMISSIONER ROGERS: Just what's your Civil Defense
15 budget and your town budget?

16 MR. NOYES: It's a little over \$6,000.

17 COMMISSIONER ROGERS: Civil Defense?

18 MR. NOYES: Correct.

19 COMMISSIONER ROGERS: And your town budget?

20 MR. NOYES: Eighteen million.

21 COMMISSIONER ROGERS: Eighteen million?

22 MR. NOYES: Uh-huh.

23 COMMISSIONER ROGERS: Thank you.

24 CHAIRMAN ZECH: Commissioner Curtiss?

25 COMMISSIONER CURTISS: No.

1 CHAIRMAN ZECH: Any other questions, fellow
2 commissioners?

3 [No response.]

4 CHAIRMAN ZECH: All right. Thank you very much for
5 being with us today. We appreciate your coming.

6 MR. NOYES: Thank you.

7 CHAIRMAN ZECH: We will ask Ms. Ann Waitkus-Arnold,
8 who is the Chairwoman of the Disabled Persons Advisory Group on
9 Nuclear Evacuation, Massachusetts Office of Handicapped
10 Affairs. Ms. Waitkus-Arnold, am I pronouncing that correct?

11 MS. WAITKUS-ARNOLD: Yes, you are.

12 CHAIRMAN ZECH: Thank you very much for being with us
13 today, and you may proceed.

14 MS. WAITKUS-ARNOLD: Thank you. Good afternoon and
15 thank you for inviting me to speak here today.

16 As Chairwoman for the Disabled Persons Advisory Group
17 on Nuclear Evacuation, I have been intimately involved in
18 emergency planning procedures for all nuclear plants affecting
19 the one million disabled people in Massachusetts, including
20 Pilgrim 1, Yankee Rowe of Vermont, Yankee and Seabrook Station.

21 The Massachusetts Office of Handicapped Affairs
22 initiated the first meeting with officials from Boston Edison
23 several years ago about emergency planning for people who
24 cannot evacuate on their own, and we have pursued this issue in
25 the intervening time by forming a Working Group on Disability

1 Issues and Emergency Planning in the event of an accident at
2 the Pilgrim Power Station. We have suggested a proposal be
3 commissioned for a Comprehensive Project to determine emergency
4 planning needs for people who require assistance.

5 The current status of planning for elderly and
6 disabled people and others with special needs is grossly
7 inadequate. The Evacuation Time Estimates, developed by Boston
8 Edison, are completely inadequate. Boston Edison has used
9 these figures as if they were correct over the strong
10 opposition from the Office of Handicapped Affairs.

11 We feel BECO is acting in bad faith. The research
12 methods for this document were seriously flawed, thus the
13 figures from Boston Edison arrived at are invalid. For
14 example, BECO alleges that approximately one percent of the
15 population is disabled, when the latest Harris Polls for the
16 United States Disabilities Census shows actual figures of 17
17 percent, many of whom would need assistance in an emergency.

18 We also know that the fastest growing population in
19 this country are people over 65, the majority of whom have
20 disabilities. They are not included in this poll. Thus,
21 Boston Edison's reassurances cannot be relied upon.

22 The addition of thousands of people in the Pilgrim
23 EPZ needing special arrangements and care could throw the
24 entire evacuation plans into disarray. Therefore, Edison's
25 erroneous figures for the special needs population actually

1 would invalidate all of the ETE results which are used as a
2 basis for any planning that is being proposed.

3 Attempts to have this population self-identify also
4 have not worked. Full page ads in several local newspapers
5 have only elicited ten responses. This extremely low response
6 is no surprise to this Agency; historically, the self-
7 identification process for this target population has not
8 worked.

9 The legal definition of a disabled person is any
10 person who has an impairment that limits one or more major
11 activities of daily living. This includes people who have
12 problems with walking, talking, seeing, hearing, breathing, or
13 thinking. This definition encompasses people with
14 developmental disabilities, medically fragile persons, elderly
15 persons, people with mental illness, persons with sensory or
16 physical limitations, temporarily disabled persons, and the
17 transitory population -- disabled people who leave their place
18 of residence for school, sheltered employment or adult care,
19 and travel in and out of the EPZ for these services.

20 We presume that other special needs populations,
21 including the schools, nursing homes, hospitals, and group
22 homes will be planned for separately.

23 The Comprehensive Survey goals deserve particular
24 attention. The task of this project goes far beyond the
25 development of rough estimates of numbers of people with

1 disabling conditions in the area who might need accessible
2 transportation only. The challenge is much more complex than
3 this.

4 We must develop an area profile showing the known and
5 probable distribution of disabled people at several specific
6 times reflecting working and non-working hours and weekends.
7 We must determine how the evacuation of the general population
8 will effect people who need special assistance.

9 We must develop current standards for people who may
10 be at too great a risk to evacuate, including evaluating the
11 attendant risks of remaining behind. These people could
12 include hospitalized infants, children and adults, nursing home
13 patients, and people on life support systems at home. They
14 could be anyone of us unfortunate enough to be hospitalized for
15 a serious condition during a radiological emergency.

16 Who will stay behind with these people? There must
17 be agreements made with people who are willing to remain behind
18 and provide care for those who can't be moved. These workers
19 would have to be provided with specialized training for dealing
20 with a radiological accident, and the risk of having to take
21 potassium iodide along with their patients.

22 The most critical facet of this plan is the
23 requirement for functional skills assessment for the
24 communities involved in terms of supervision and assistance.
25 In order for proper planning to happen, this assessment must be

1 conducted in relation to residence and location in the
2 community, and must provide for transitory populations.

3 What levels of assistance will people need to safely
4 evacuate?

5 Also, the plan must address people with low incidence
6 disabilities. These people, such a person who may be a
7 quadraplegic, would require continuous, very specialized
8 planning and care to survive, even in a sheltered situation.
9 Their living situation and formal support requirements must be
10 assessed, as well as their general environment, including daily
11 activities in correlation with the general evacuation process.

12 Throughout the process of this proposal's
13 development, Boston Edison agreed to pay for this project.
14 However, several months after its completion, they reneged on
15 their agreement. They have failed to act in good faith, once
16 again, and we are left facing a potentially dangerous situation
17 with no factual data. Valid planning is not possible in such
18 an informational vacuum.

19 There must be an honest evaluation of the feasibility
20 of actually evacuating and caring for all of the men, women and
21 children in the EPZ who comprise the special needs population.
22 As you know the population in Plymouth has almost tripled since
23 Pilgrim Station went on line 16 years ago, and the two lane
24 evacuation routes are often bumper to bumper, even in normal
25 situations. Evacuation routes are overburdened during normal

1 use, but especially in the summer months.

2 As presently planned, evacuation activities of the
3 general population will make it impossible to evacuate the
4 sizable numbers of people with special needs. Slipshod
5 preparations proposed by Boston Edison with the NRC's apparent
6 agreement are highlighted by the recent statement by NRC
7 officials that "present planning is sufficient for re-start."

8 Sufficient for whom? Since there is no planning for
9 the special needs population, and this clearly discriminates
10 against that population, and is, thus, a violation of the
11 Massachusetts Constitution Amendment 114. This law guarantees
12 equal protection for people with disabilities in Massachusetts.
13 There are also questions as to whether this discriminatory
14 behavior violates federal laws.

15 What is required is the guarantee that citizens of
16 Massachusetts with special needs have an equal opportunity to
17 leave an area around a nuclear plant during a radiological
18 accident.

19 It is illogical and duplicitous to go on low power,
20 the only object of which is to go to full power, without any
21 viable plan for evacuating the population. It is our position
22 that Pilgrim Station should remain closed until and unless safe
23 evacuation plans can be made for all people, not just some
24 people.

25 CHAIRMAN ZECH: Thank you very much. Commissioner

1 Roberts?

2 COMMISSIONER ROBERTS: No.

3 CHAIRMAN ZECH: Commissioner Carr?

4 COMMISSIONER CARR: Yes. You know this is not a new
5 problem brought on by nuclear power plants. How does the state
6 and you cope with this problem in other areas?

7 MS. WAITKUS-ARNOLD: I haven't worked with the state
8 on other areas besides planning for nuclear emergencies. This
9 is what I work on; I don't work on other types of emergencies
10 for the state.

11 COMMISSIONER CARR: Well, --

12 MS. WAITKUS-ARNOLD: We became involved when, five
13 years ago, I found that people with special needs really
14 weren't included in planning.

15 COMMISSIONER CARR: But you mean by that, you don't
16 look at other types of emergencies where they have evacuated
17 people in handicapped positions and see how that works, and see
18 if that's something you can apply?

19 MS. WAITKUS-ARNOLD: Right -- no. Right now, I'm
20 looking at evacuations for a nuclear disaster, which, of
21 course, would be much different than planning for other types
22 of emergency.

23 COMMISSIONER CARR: Well, let's take the Springfield
24 fire. Seventy-thousand people, over a number of days, in and
25 out. Obviously, they had to move handicapped people. Did you

1 look at that?

2 MS. WAITKUS-ARNOLD: I haven't looked at that
3 personally.

4 COMMISSIONER CARR: I recommend you do that.

5 MS. WAITKUS-ARNOLD: Well, I also recommend that
6 people with special needs be included in planning for nuclear
7 emergencies.

8 COMMISSIONER CARR: I acknowledge that.

9 MS. WAITKUS-ARNOLD: Do you?

10 COMMISSIONER CARR: But do you know how they -- you
11 say that one of the problems is they won't self-identify. How
12 are you going to solve that?

13 MS. WAITKUS-ARNOLD: That's historically.

14 COMMISSIONER CARR: How are you going to solve that?

15 MS. WAITKUS-ARNOLD: By the survey, I was just
16 talking to you about for the past five minutes, ten minutes. I
17 have a copy of that I'd like to submit to you.

18 COMMISSIONER CARR: Do you know how they did that in
19 the Springfield fire? They did it by calling 911.

20 MS. WAITKUS-ARNOLD: We're talking about 94,000
21 people here, with one million tourists.

22 COMMISSIONER CARR: Oh, I'm not talking about 94,000

23 --

24 MS. WAITKUS-ARNOLD: You're talking about the
25 Springfield fire.

1 COMMISSIONER CARR: -- that need this special
2 assistance, I think.

3 MS. WAITKUS-ARNOLD: I'm talking about Pilgrim
4 Station, Mr. Carr.

5 COMMISSIONER CARR: Thank you. I'll save the rest of
6 them for the state, since it's not your problem.

7 MS. WAITKUS-ARNOLD: It's not my -- it's the state's.

8 CHAIRMAN ZECH: Commissioner Rogers?

9 COMMISSIONER ROGERS: I have no questions.

10 CHAIRMAN ZECH: Commissioner Curtiss?

11 COMMISSIONER CURTISS: No.

12 CHAIRMAN ZECH: No, I don't have any questions, but I
13 agree that it probably would be valuable to look at how
14 handicapped people are evacuated in other emergencies.

15 But I just want to thank you very much, Ms. Waitkus-
16 Arnold, for your appearance here today, but also for what
17 you're doing for handicapped people. I hope that you're making
18 -- you're certainly showing an important leadership role in the
19 area you're specializing in, in nuclear, but I want to thank
20 you for what you're doing for all handicapped people, because I
21 think you're doing that also.

22 Any other questions, my fellow commissioners?

23 COMMISSIONER CARR: He didn't ask you if you had a
24 question.

25 MS. WAITKUS-ARNOLD: No, I don't have any questions.

1 CHAIRMAN ZECH: All right. Thank you very much for
2 being with us today.

3 MS. WAITKUS-ARNOLD: I would also hope that you
4 gentlemen would have the same concern for people with special
5 needs that I do, and to ensure that they're included in
6 planning before you give a license to start a nuclear power
7 plant.

8 CHAIRMAN ZECH: Thank you very much. We appreciate
9 your being with us today very much.

10 We are calling Mr. Peter Agnes, Assistant Secretary
11 of the Office of Public Safety, Commonwealth of Massachusetts.
12 Mr. Agnes? Mr. Agnes, welcome. You may proceed.

13 MR. AGNES: Thank you, Mr. Chairman. Good afternoon,
14 Commissioners.

15 On my right is Mr. Jeffrey Hausner of the Nuclear
16 Safety Emergency Preparedness Unit within the Civil Defense
17 Agency of the Commonwealth of Massachusetts, and to my left is
18 Mr. David Quaid, who is a resident of the Saquish/Gurnet area
19 of Plymouth. And during my presentation, which I will
20 abbreviate as far as I can to give you an opportunity to ask
21 some questions, Mr. Quaid will speak for a few moments about
22 some slides which he's prepared to show you some of the
23 specific concerns we have about that particular part of the
24 EPZ.

25 The Massachusetts Secretary of Public Safety is

1 pleased that the opportunity to address the Commission on the
2 status of off-site preparedness for an accident at the Pilgrim
3 Nuclear Power Station. As others have said to you today, the
4 meeting, we think, is long overdue.

5 Those here today should bear in mind that it was the
6 Commonwealth of Massachusetts, and not the Nuclear Regulatory
7 Commission, and not the Federal Emergency Management Agency,
8 which first drew attention to the issues we are here today to
9 discuss.

10 It was a result of Governor Dukakis' initiative that
11 we produced the first comprehensive report analyzing emergency
12 preparedness for an accident at Pilgrim's Station in December
13 of 1986. That 200-page report was the first to document that
14 emergency planning in the Pilgrim area was woefully inadequate.

15 It is interesting to us that nearly two years after
16 that report was issued, we have yet to receive any formal
17 response to its conclusions from the NRC.

18 In the summer of 1987, the Commonwealth sponsored the
19 first of many open public meetings at which citizens and local
20 government officials were invited to discuss emergency
21 preparedness and their safety. The Commonwealth has held 21
22 public forums in the intervening months. Also, the staff of
23 our Nuclear Safety Emergency Preparedness Program has held 77
24 weekly working meetings with EPZ Public Safety Officials, and
25 attended more than 180 meetings of local boards and committees

1 regarding emergency preparedness.

2 While the staff may tell you that they have held
3 meeting after meeting with EPZ residence, let the record show
4 that up until today, the Commission has not once hosted a
5 single public meeting to hear from local and state officials on
6 off-site emergency preparedness for the Pilgrim EPZ. Given the
7 serious nature of the subject, we think this is a deplorable
8 record for a federal regulatory body whose specific charge is
9 protection of public health and safety.

10 On two occasions, the NRC has addressed off-site
11 preparedness. In a meeting here on October 6, local officials
12 had hoped to inform you of their concerns but were denied the
13 opportunities to speak. And on October 14, there was another
14 meeting held here in which the staff of this Commission
15 discussed preparedness with you, in which the licensee
16 discussed emergency preparedness, but where we were forcibly
17 denied the opportunity to rebut blatant misrepresentations by
18 your staff.

19 In fact, on October 14th, your own staff stated that
20 they had met with public officials of EPZ communities to
21 discuss the status of planning. This statement is clearly no
22 true.

23 A series of meetings was held by your staff with EPZ
24 and host communities between October 25 and November 2nd of
25 this year, and these have been documented in a series of

1 undated memoranda from Mr. Lazarus to Mr. Russell.

2 Shortly thereafter, I met with representatives of
3 several EPZ communities, and it was the unanimous sense of the
4 EPZ towns that the Lazarus memoranda did not accurately reflect
5 the number and severity of unresolved planning items. Some of
6 that concern was expressed to you earlier today.

7 Let me say that the Commonwealth of Massachusetts is
8 not opposed categorically to the operation of Pilgrim Nuclear
9 Power Station. However, we will not support the re-start of
10 the Station until we are satisfied that a plan exists which
11 satisfies every requirement of NUREG-0654, and other regulatory
12 criteria. Nor can we support re-start until we are certain
13 that public safety can be protected in the event of a nuclear
14 accident, as demonstrated in a full-scale graded exercise of
15 those plans. Further, we do not believe that Pilgrim should be
16 authorized to re-start until the licensee demonstrates its
17 ability to operate the facility in a responsible and safe
18 manner.

19 At this moment, we lack confidence in all of these
20 regards.

21 I deeply regret that the Federal Emergency Management
22 Agency, the one federal agency exclusively charged to deal with
23 emergency preparedness, has not participated in any of our
24 planning activities. In a meeting I held with FEMA Regional
25 Director Henry Vickers in October of 1987, he promised that a

1 member of his staff would be delegated to work with the
2 Commonwealth and local governments in emergency planning. No
3 such action was ever taken.

4 As recently as November 18th of this year, I wrote to
5 FEMA National Director Julius Beckton -- a copy of the
6 correspondence is attached to my testimony -- asking whether
7 Pilgrim was the only nuclear power station in the country for
8 which FEMA has withdrawn interim approval of emergency plans,
9 and for which every state and local authority has expressed its
10 lack of confidence in emergency preparedness.

11 To date, we have received no response to this simple
12 inquiry.

13 FEMA has been invited to join every meeting held at
14 which emergency planning was discussed, including our weekly
15 working group meetings. But they have chosen not to accept our
16 invitations. In fact, FEMA failed to send a representative to
17 the meeting that took place between myself and Mr. Lazarus on
18 October 22nd of this year, at which we gave the NRC a
19 comprehensive review of the status of off-site planning.

20 On October 13th of this year, the day before your
21 Commission meeting, we received a letter from Mr. Vickers in
22 which he said, "Before we fully respond to your September 2nd
23 and September 29 of 1988 letters, we would like an opportunity
24 to carefully study and review the report to the Governor."

25 I ask today, on December 9th, how long does it take

1 FEMA, your sister agency with which the NRC has a letter of
2 agreement concerning assessment of off-site emergency
3 preparedness, to respond to important requests for information
4 and analysis?

5 I'd like to touch briefly on ten specific areas with
6 which we are concerned regarding off-site emergency
7 preparedness. Let me say, however, as an aside, in response to
8 an earlier question about the hope that you would hear about
9 the great progress that has been made to date in emergency
10 planning, that I don't believe it's my responsibility to come
11 here to Rockville from Massachusetts to tell you about that
12 progress.

13 We documented, in our report of October, 1988, as we
14 had in earlier reports, very comprehensively, the progress and
15 deficiencies in off-site planning.

16 As we find ourselves on the eve of what may be a
17 decision to re-start the Pilgrim Nuclear Power Plant, I think
18 it's incumbent upon us to use these precious few minutes to
19 talk about the problems that still remain with off-site
20 planning. And there are essentially ten areas where we would
21 like to briefly touch upon.

22 In the area of training, you may wish to note that
23 although there has been considerable training of emergency
24 personnel and workers, that training is approximately two-
25 thirds left uncomplete, or incomplete, rather. And this is

1 across the EPZ and the reception center communities.

2 You have also heard each of the towns talk about the
3 implementing procedures that are so critical to the emergency
4 plan. As part of this testimony, I have presented to you today
5 a status report on the development of implementing procedures
6 by each community.

7 Let me make clear that we have not yet received a set
8 of implementing procedures which have been approved by local
9 officials from any of the five EPZ towns or the two host
10 communities. Five of the towns have forwarded draft procedures
11 to us, and we have sent these and other planning documents to
12 FEMA for informal technical review more than two months ago.

13 Out of the more than 300 procedures under
14 consideration by the seven communities, only about 190 have
15 been approved in concept by local officials. Two communities
16 do not feel sufficiently comfortable yet with the procedures
17 they have developed to even have submitted them to us and FEMA
18 in draft form.

19 Let me also say, briefly, with respect to the matter
20 of expenditures and budgets, although the communities that you
21 have heard from have had relatively modest civil defense
22 budgets, the record should indicate that vast sums of money
23 have been spent by both the licensee and the Commonwealth over
24 the past two-and-a-half years in an effort to address these
25 concerns. While I don't wish to speak for the licensee, I do

1 wish to say that it must be in excess of a million dollars that
2 the licensee has spent in this regard, and we applaud that
3 effort that they have made.

4 The state, thanks to an initiative by the Governor,
5 has an appropriation this fiscal year of almost \$500,000
6 exclusively for off-site emergency planning, which supports a
7 staff and provides us with the means for engaging consultants
8 and working with local governments.

9 So that, although the local communities have
10 relatively modest budgets, they have committed enormous
11 resources in terms of time; the licensee has spent a great deal
12 of money, and the state has spent a considerable amount of
13 money and is continuing to do so.

14 Now, in addition to concerns about implementing
15 procedures, we are also concerned, as Ms. Waitkus just
16 reported, about the needs of those people in the EPZ with
17 various kinds of disabilities. And while progress has been
18 made, despite the best efforts of state and licensee officials,
19 we have yet to undertake the comprehensive survey of people
20 within the Emergency Planning Zone with special needs who
21 require exceptional assistance during an emergency.

22 This survey is intended to identify who those people
23 are in an effort to supplement the outreach that each of the
24 communities in the state has done.

25 I should also add, briefly, that the planning process

1 that some of you asked questions about is very much a product
2 of state and local governments, and one that the licensee has
3 bought into and endorsed for the past two-and-a-half years.

4 The process was intended to produce the very best
5 possible plan, starting at the local level, so that the
6 painstaking procedures that were described to you for local
7 department head working with state and licensee officials to
8 first approve in concept, to submit to the Selectmen, to submit
9 to the state, and to submit to the federal regulatory agency
10 such as FEMA, was well thought out with the licensee, and
11 something that the licensee concurred in and has been
12 supportive of for the past two years. So that while it has
13 taken a great deal of time, it is one that all parties
14 concerned believed would produce the best possible plan.

15 In addition to those two concerns, implementing
16 procedures and special needs, off-site communications is
17 critical.

18 State and local officials have worked diligently with
19 the licensee to install a new off-site notification system.
20 Nonetheless, as of this moment, training has not been completed
21 for all personnel who must operate the system, and the system
22 has not been subjected to a full test.

23 Note that in November of 1987, the last time that an
24 unusual event was declared at Pilgrim Station, not all
25 officials were notified within 15 minutes. Therefore, I have

1 no basis to say today that we are capable even of noting all
2 off-site authorities of an accident, as required by federal
3 regulations.

4 We're also very much concerned, as you've heard
5 today, about traffic management throughout the EPZ and to the
6 reception centers. The last section of the evacuation time
7 estimate and traffic management analysis, commissioned by
8 Boston Edison, was not received until late in October of this
9 year.

10 The ETE and traffic management plan are enormously
11 complex, and in the space of two months, we have not yet been
12 able to assess the adequacy of these very important documents.

13 I should also add, as an aside, that we have engaged
14 an outside consultant to help us in this effort and will
15 continue to work with that consultant and local officials and
16 the licensee on traffic management for all of the EPZ towns,
17 and the many community through which traffic must pass on its
18 way to reception facilities.

19 In speaking with local officials from each community
20 prior to developing our October 1988 report, we also learned
21 that communities generally feel that they do not have adequate
22 personnel identified to fulfill all emergency functions
23 detailed in their draft plans.

24 We will not certify that plans are adequate until it
25 has been demonstrated that all local as well as state response

1 agencies can fill their emergency personnel rosters. This
2 issue is one that perhaps will not be resolved until we have
3 had that graded full-scale exercise.

4 We remain concerned that we do not have reception
5 centers that are capable of providing all required services to
6 evacuees, including radiological monitoring and
7 decontamination. The state and the licensee are actively
8 engaged in a process under which the necessary capital
9 improvements will be made to the designated state institutions
10 which will serve as reception centers.

11 Nonetheless, these improvements have not been
12 completed, and we cannot state today that we can provide even
13 radiological monitoring to evacuees in a timely manner.

14 Perhaps our most vulnerable population are our
15 children of school age. While significant progress has been
16 made in drafting better plans for their care, we have a
17 distance to go in providing training to the teachers and other
18 school personnel responsible for protecting children in the
19 event of a nuclear accident. Moreover, not all EPZ towns have
20 enunciated a clear policy on early closing of schools, and
21 whether children will be kept together or dismissed.

22 Again as an aside, the school teachers, principals,
23 and administrators are probably the last group of local
24 officials who have been -- who we, and the licensee, and other
25 local government officials have worked with on the development

1 of implementing procedures, simply because attention was first
2 given to primary responders such as police, fire, and public
3 works. So the school populations, both administrative and
4 teaching, are groups that are large, diverse, and groups with
5 which a great deal more work needs to be done.

6 FEMA has re-assessed its policy on shelter as a
7 protective action, and now claims that it is unnecessary as an
8 element of emergency response planning. We believe this is an
9 unwise decision given the range of accident scenarios
10 postulated for nuclear facilities.

11 We are requiring that each EPZ town have a shelter
12 utilization plan to provide the maximum protection to resident
13 and transient populations, including people at beaches and
14 other recreation areas. Although there have been good faith
15 efforts, again, by the licensee and local governments, we have
16 not yet received draft shelter utilization plans from two of
17 the EPZ communities, and thus cannot assess the adequacy of the
18 emergency response system until these are received.

19 At this point, I would invite Mr. David Quaid to
20 present some photographs of the EPZ area in which he owns a
21 home, the Saquish/Gurnet section of the town of Plymouth. This
22 is a remote area just three miles from Pilgrim's Station, which
23 lies at the end of a three-mile peninsula, served by a road
24 which is difficult to traverse under the best conditions when
25 it is passable, only in four-wheel-drive vehicles, and

1 virtually impassible in bad weather and during peak tides. A
2 number of people such as Mr. Quaid own winterized homes there,
3 and reside in Saquish fulltime or part-time.

4 Since a picture is often worth a thousand words, let
5 me ask, with your permission, Mr. Quaid to briefly comment on
6 some of the slides. Mr. Quaid?

7 CHAIRMAN ZECH: Certainly, Mr. Quaid. Welcome, and
8 you may proceed.

9 MR. QUAID: Thank you very kindly.

10 CHAIRMAN ZECH: Certainly.

11 MR. QUAID: First slide, please. This is a U.S.
12 nautical map of the area. As you can see, it's a barrier beach
13 shaped like a fish hook. At the top, at the very top, you can
14 see the long, wooden bridge. That's the straight line at the
15 very top. That's north. At the right-hand bottom is Gurnet
16 Point, which is just a shade over three miles from Pilgrim 1.
17 That distance is four-and-a-half miles from the bridge to the
18 Gurnet Point light. And then to your left, and sloping down
19 toward the center, is Saquish Beach and Saquish Head.

20 Next slide, please. This, the little triangle there,
21 shows the angle of view of a series of aerial photographs that
22 were accomplished on July 3rd of 1988 in order to demonstrate
23 some of the problems with evacuation in this area.

24 The -- oh, I will proceed up the beach to the --
25 what's called the Public Beach, and show you the various

1 situations of concern to the people of Gurnet/Saquish, and of
2 Duxbury.

3 Next slide, please. And this is the angle. That is
4 Gurnet Point there. There's about 40 residents there, seven or
5 eight all-year-round residents, and, of course, all those area
6 homes are occupied full-time in the summer.

7 As you can see at the upper part of the picture that
8 white building at the top with the arrow pointing to it is
9 Pilgrim 1, and that is just over three miles down wind. And
10 this is very important. From the end of April through October,
11 this area is down wind of Pilgrim 1, the times of greatest
12 beach population.

13 Next slide, please. Now we progress further north up
14 the beach.

15 Could I have the next slide. This shows -- this is
16 typical of the road. It's a little hard to see, but there are
17 cables along either side. Anyone evacuating from this area
18 must stick to the road. You cannot, it's impossible to drive a
19 car through these heavy steel cables. And that situation
20 continues for four-and-a-half miles down to the bridge.

21 Next slide. This is the area called High Pines,
22 which is halfway down the beach. Next slide. And as you can
23 see, the four-wheel-drive vehicles, on a very, very cold day.
24 Later you'll see that, in the parking lots, that they're less
25 than 50 percent utilized, and normally, there'd be twice the

1 number of vehicles at this point.

2 Next slide. This is just a little further north,
3 and, as you can see, it says, "One of two exits from beach in
4 four miles." Those are the only two crossovers, as they're
5 called locally, in four miles, and in time of evacuation, it
6 would be very, very difficult to get the hundreds of four-
7 wheel-drive vehicles out of those -- especially at high tide,
8 out of those crossovers, which are very soft sand. I've been
9 stuck there many times, and I've lived there a long time.

10 Next slide. Now we're a little further down the
11 beach, toward the Public Beach. Next slide. And as you can
12 see, it's just endless four-wheel-drive vehicles. And as I
13 said, on a warm day, you would actually have to drive between
14 two lines of four-wheel-drive vehicles to navigate that area of
15 the beach.

16 Next slide. This is the area of the -- what's called
17 the Town Beach. And, as you can see, the long bridges in the
18 middle of the scene.

19 Next slide. This is the Town Beach, and you can see
20 that the parking lots are just -- less than 50 percent
21 utilized, but you do get an idea of the number of people that
22 utilize this area.

23 Next slide. This now shows, contiguous to what's
24 called the Town Beach, is what's called the Public Beach. And
25 there are somewhere between 2,00 and 2,500 parking spaces in

1 this area.

2 Next slide. And this the Public Beach with the -- it
3 shows the number of people utilizing it, plus the bath house
4 and the parking spaces. But when -- on times of heavy use,
5 which is every weekend, the marked parking spaces are quickly
6 used up, and then they park just about anywhere they can.

7 These are estimates of beach population. Well, let's
8 say -- let's just use 2500 as a figure. With 2500 parking
9 spaces, nobody comes to a place like this by themselves. Let's
10 conservatively say that's 5000 people at that point.

11 The Gurnet/Saquish area, conservatively speaking, is
12 somewhere between 3500 and 4000 people using it, and the four
13 and a half miles from the bridge to the Gurnet, you have
14 probably another 3000 people using it, so that would be -- five
15 and three is eight -- that's 12,000.

16 And then Al Siemano, who is the Oversight Safety
17 Supervisor for Boston Edison stated at an Emergency Response
18 Study Committee meeting that BECO had also made an overflight
19 1987 -- their estimate was 16,000 people. He did not state
20 whether Plymouth beaches were also included in this figure.

21 Next slide, please.

22 [Slide.]

23 All right, now we're out at Saquish. The angle is
24 from just off Saquish Head along Saquish Beach.

25 Next slide.

1 [Slide.]

2 This is July 3rd, and there were between the estimate
3 by professional security people -- were that there were between
4 400 and 500 four-wheel drive vehicles had gone past that
5 checkpoint, and they estimated that there were 3500 people
6 there on that cold day.

7 Now if you look beyond, you'll see there's many, many
8 houses and cottages in that area. Contrary to testimony of
9 October 14th, people do overnight on these beaches. There are
10 some 300 cottages and all-year-round homes with entire families
11 in residence from May until late September.

12 CHAIRMAN ZECH: Excuse me. What day was that you
13 were referring to again?

14 MR. QUAID: July 3, 1988.

15 CHAIRMAN ZECH: July 3, 1988.

16 MR. QUAID: 1988. A very cold day, I must say.

17 CHAIRMAN ZECH: Thank you.

18 COMMISSIONER CARR: That was Fourth of July weekend.

19 MR. QUAID: Yes, it was. It was the Fourth of July
20 weekend.

21 CHAIRMAN ZECH: Thank you very much.

22 MR. QUAID: Next slide.

23 [Slide.]

24 This shows now the angle of greatest concern by
25 people of that area for evacuation.

1 Next slide.

2 [Slide.]

3 Now this is the angle. Now you see it shows Gurnet
4 Point to the right, and then there's an A figure and an angle
5 pointing to a road area. Then there's a B figure and a C.

6 The A area is totally inundated during high course
7 tides.

8 Next slide.

9 [Slide.]

10 This now shows the angle that we shot, the high
11 course tide of September 26th, which was only an 11-4 tide.
12 Real high course tides are 11-9 to 12 foot, and it was a dead
13 calm day. On a storm force day or a wind force day, the depth
14 is considerably more.

15 Next slide.

16 [Slide.]

17 As you can see, it's a flat calm day. This is the
18 road that's inundated. You can see the reflection of the 4-
19 foot ruler I put in to give an idea of the -- and the birds --
20 give an idea of the depth. It came to just an inch short of
21 two feet on an 11-4 tide on a flat calm day. And that's very
22 unusual.

23 COMMISSIONER CARR: Did it last two hours?

24 MR. QUAID: No, no. This was at high tide.

25 COMMISSIONER CARR: So --

1 MR. QUAID: Oh, how last -- oh, I can give you that.

2 The Lazarus report says two to three days per month.

3 COMMISSIONER CARR: No, no. I mean --

4 MR. QUAID: Oh, oh --

5 COMMISSIONER CARR: -- it lasts --

6 MR. QUAID: Oh, it lasts a minimum of two and a half
7 hours to three hours, yes.

8 COMMISSIONER CARR: Okay.

9 MR. QUAID: But now that you mention that, the
10 Lazarus report said two to three days. It's actually three to
11 four days. I sent to Mr. Chilk a tide calendar, and it showed
12 that most high course tides are four days, and that's a matter
13 of record.

14 Next slide.

15 [Slide.]

16 Okay. Now this is the B and C area of that previous
17 photograph. To the right is what we call the back road. The
18 back road is a goat trail. It's underwater. It is just a
19 single lane, a sand trap is what it is, and it's underwater at
20 high course tides. That's to the right.

21 To the left is the only access and egress for 3500
22 people in the event of difficulty. And as you see, the road
23 goes up there. You can't even see someone coming the other
24 way. It takes the greatest of courtesy to handle that over a
25 weekend with cars constantly meeting in the middle. Someone

1 has to back up.

2 Next slide.

3 [Slide.]

4 This shows on September 26th, about a half-hour after
5 the -- the 27th -- after the previous high course tide, the
6 shot you saw previously. This is the angle along what's called
7 the curved beach toward Saquish Head.

8 Next slide.

9 [Slide.]

10 And this is on a flat calm day, and this is the only
11 evacuation route for 3500 people under those conditions. And
12 that's it.

13 If you have any questions, I'd be happy to answer
14 them.

15 CHAIRMAN ZECH: Thank you very much. We appreciate
16 it.

17 Any questions from my fellow Commissioners?

18 COMMISSIONER CARR: Are we through completely or --

19 CHAIRMAN ZECH: I don't know. No.

20 MR. AGNES: I have a few brief additional --

21 COMMISSIONER CARR: I'll wait.

22 MR. AGNES: Thank you.

23 CHAIRMAN ZECH: Mr. Agnes, you may proceed.

24 MR. AGNES: Those were ten specific emergency
25 planning issues or concerns that the Commonwealth brings to you

1 today.

2 In addition to that, I want to comment briefly on an
3 issue that arose during one of the earlier presentations from
4 the town of Bourne, which is to make clear what the
5 Commonwealth's position is.

6 We have accepted the request an interest shown by the
7 town of Bourne and have designated Bourne as part of the
8 emergency planning zone under state law and have sent the
9 necessary requests to FEMA and to the NRC for appropriate
10 recognition of Bourne, as well as Wareham and Plimpton, which
11 are contiguous towns, and both of which technically have some
12 of their town within ten miles -- to the regulatory agencies
13 for acknowledgement of those three towns under federal law as
14 being part of the EPZ. There has been no further action taken
15 by FEMA or the NRC, to our knowledge, and we have indicated to
16 the town of Bourne that we will make every effort consistent
17 with our obligation to first address concerns of the
18 communities which have traditionally been part of the EPZ to
19 work with them on emergency planning, and we would certainly
20 hope that the Commission would acknowledge that decision made
21 by the Commonwealth of Massachusetts as well.

22 Now in addition to the emergency planning concerns
23 that I just outlined, part of the presentation, written
24 presentation, today deals with some concerns we have regarding
25 management and personnel matters, which I won't take time to

1 discuss in detail, other than to note briefly that we have done
2 an analysis of so-called 50.72(c) event reports received from
3 the licensee over the past year, simply to ascertain whether
4 any pattern emerges from an examination of this material, and
5 as the material indicates, there does seem to be a much higher
6 percentage of what we have characterized as personnel or human
7 error in connection with those reports for Boston Edison
8 Company and Pilgrim Station than there does appear to be for
9 Rowe or Vernon, which are operating nuclear power plants as
10 opposed to, as you know, the Pilgrim nuclear power plant.

11 We draw no specific conclusions from that, but simply
12 bring it to your attention as an issue that we hope your staff
13 perhaps will look into as well and which may reflect on the
14 training or the management of the licensee's operation.

15 Many of the people who have spoken before me today
16 have talked about the need for a test of the plants. We have
17 been saying for as long as we have been discussing emergency
18 planning issues that there is a need for a full-scale, graded
19 exercise at Pilgrim Station. The last exercise took place in
20 September of 1985, and we think that with all of the
21 development that has been done, that the present emergency
22 preparedness situation resembles that of a new licensee.

23 For this reason alone, Pilgrim Station should not be
24 permitted to restart until a successful full-scale exercise of
25 all plants, facilities, and personnel has been held, which

1 demonstrates that all FEMA exercise objectives can be met.

2 Your staff alleges that the Commonwealth, having held
3 exercises for other nuclear power plants, has given evidence of
4 sound preparedness to respond to an accident at Pilgrim. We
5 think this argument is patently absurd.

6 An emergency exercise for one site indicates
7 absolutely nothing about emergency response capabilities in
8 other EPZs. The Massachusetts response system is designed such
9 that first responsibility for public safety resides with local
10 authorities, and having been no demonstration of local
11 capabilities in the Pilgrim EPZ communities for more than three
12 years, the need for an exercise should be apparent.

13 Moreover, Dr. Murley has asserted on previous
14 occasions that plans for a response to an accident at Pilgrim
15 Station are better than ever. I simply cannot imagine how such
16 a statement can be made in the absence of a meaningful test of
17 the plants. Exercises that may have been held for previous
18 emergency plans at Pilgrim Station simply have no bearing on an
19 analysis of present-day plans, because, as you have heard in
20 such great detail today, we are dealing with an entirely new
21 set of procedures in plants, some of which are not even
22 complete.

23 In our judgment, it would be irresponsible for the
24 Commissioners to authorize the restart of Pilgrim Station until
25 the following conditions are met:

1 That each emergency planning zone and host community
2 has in place an emergency plan which meets all regulatory
3 requirements and which has the endorsement of local officials,
4 as well as state officials; there has been a successful full-
5 scale graded exercise of all emergency plans, facilities, and
6 personnel and compelling documentary evidence that the Boston
7 Edison Company can manage Pilgrim Station in a safe and
8 responsible manner.

9 Thank you for listening to us today, and I would be
10 happy to try to answer any questions or respond to any comments
11 you may have.

12 CHAIRMAN ZECH: Thank you very much.

13 Commissioner Roberts?

14 COMMISSIONER ROBERTS: No.

15 CHAIRMAN ZECH: Commissioner Carr?

16 COMMISSIONER CARR: Yes. I'd like to start with Mr.
17 Quaid, if that's all right.

18 I assume they evacuate those low-lying areas in
19 hurricanes.

20 MR. QUAID: Some do, some don't. Truthfully, the
21 situation at Gurnet and at Gurnet Head, everybody is very self-
22 contained out there. We all have generators; we all have gas
23 lights. Our refrigeration is gas. My whole house, heating,
24 everything, is run on one fuel, which is propane. So as a
25 result, in hurricanes we're better off than anybody on the

1 mainland.

2 COMMISSIONER CARR: You're a self-sufficient, sealed-
3 up community?

4 MR. QUAID: Yes, yes.

5 COMMISSIONER CARR: So as I understood your
6 description of the evacuation, were you saying it was
7 impossible or just hard?

8 MR. QUAID: No. I would say -- I would say
9 impossible if you're discussing the situation as it exists.
10 Let's say that road that's inundated is elevated; that's one
11 thing out of the way.

12 If you doubletrack the road from the beach, that's
13 fixed.

14 COMMISSIONER CARR: Is it a private road or a state
15 road?

16 MR. QUAID: These roads are sort of private. It's a
17 mixed up situation. It's owned by the town of Plymouth, but I
18 believe the roads are owned by the conservation -- see, the
19 whole Duxbury Beach is a -- what do you call it -- is a
20 conservation area.

21 COMMISSIONER CARR: You're not going to build a road
22 there, then.

23 MR. QUAID: Well, I think if it becomes a situation
24 of improving roads that exist, I think if it's a situation of
25 public safety, I really believe that a weight can be applied

1 for that. I just don't believe that any responsible person
2 would deny that.

3 COMMISSIONER CARR: From that bridge south, how many
4 year-round residents are there? Is that south or --

5 MR. QUAID: Yes, that's exactly right. They're only
6 at Gurney Point at this point. They're at Gurnet Point. And
7 there are --

8 COMMISSIONER CARR: You said eight families?

9 MR. QUAID: There's eight families, seven or eight.
10 I think one -- there's some coming in, and one is moving out.

11 COMMISSIONER CARR: 32 people. Are they working? Do
12 they go back and forth everyday?

13 MR. QUAID: Oh, yes. Some people --

14 COMMISSIONER CARR: They only have to go back and
15 forth at low tides?

16 MR. QUAID: They have to live by the tides. I've
17 spent many a two and a half hour, you know, working late at
18 night, sleeping in the car --

19 COMMISSIONER CARR: Like waiting for a ferry.

20 MR. QUAID: Precisely.

21 COMMISSIONER CARR: I understand.

22 MR. QUAID: Until the tide receded.

23 COMMISSIONER CARR: And how would you say -- the peak
24 summer load was 12,000; is that what you said -- below that
25 bridge?

1 MR. QUAID: I would say -- no. I would say it's
2 12,000 -- and this is -- I'd say it's very conservative, but I
3 want to be conservative. I'd say 12,000 including all of
4 Saquish Beach, Gurnet, all the way down the four and a half
5 mile of town beach and including the public beach, which is
6 really an enormous number of people. There's at least 5000,
7 8000 on a summer --

8 COMMISSIONER CARR: Okay. And is the season like
9 most New England, July 4th to Labor Day?

10 MR. QUAID: No, not when you're talking about the
11 people. The people open up -- as soon as the weather gets
12 good, people open up their places. The water is frigid like --

13 COMMISSIONER CARR: Memorial Day to Labor Day?

14 MR. QUAID: Before Memorial -- Memorial Day to Labor
15 Day, yes, but actually give it --

16 COMMISSIONER CARR: Let me get a round number.

17 MR. QUAID: Give it a month before and a month after.
18 Truthfully, truthfully.

19 COMMISSIONER CARR: Okay. I understand that.

20 Now, Mr. Agnes, how do you define "technical review?"
21 Do you kind of agree with the local communities on what a
22 technical review consists of?

23 MR. AGNES: Yes, Commissioner. Our understanding of
24 a technical review is that it is an informal review. It is
25 based on the materials submitted. There is generally no

1 discussion or analysis or meeting between the parties before
2 the --

3 COMMISSIONER CARR: It says it meets the requirements
4 as laid down in some piece of paper.

5 MR. AGNES: Generally, yes.

6 COMMISSIONER CARR: Okay. As far as meetings go, do
7 you remember a meeting with me in your place?

8 MR. AGNES: I remember your stopping by,
9 Commissioner, yes.

10 COMMISSIONER CARR: You had a good opportunity to lay
11 it all on the table.

12 MR. AGNES: At that moment, I don't recall exactly
13 when that was. It was quite awhile ago, I believe, and --

14 COMMISSIONER CARR: I've only been here two years
15 plus.

16 MR. AGNES: It was not the kind of meeting, I think,
17 that we've been looking for until today, in the sense that
18 there was not an opportunity to have presented material from
19 local officials.

20 COMMISSIONER CARR: I was there. You knew I was
21 coming, and I was there for an hour and a half at your leisure.
22 I didn't have any time schedule.

23 MR. AGNES: Well, it certainly was a meeting,
24 Commissioner, but when you consider the numerous meetings --

25 COMMISSIONER CARR: Okay. I just thought we ought to

1 get the record to look right.

2 MR. AGNES: And I don't believe it was an official
3 meeting that this Commission would consider to have any impact
4 on the regulatory process either.

5 COMMISSIONER CARR: I'm just saying I was available
6 if you wanted to lay it before me.

7 The notice of an unusual event you referred to, I
8 think you ought to correct the record, your testimony says
9 November '87. You meant November '88?

10 MR. AGNES: No, Commissioner.

11 COMMISSIONER CARR: Oh, so it's been over a year ago
12 that they didn't notify you?

13 MR. AGNES: No. The point of the testimony was, at
14 that time the notification was not able to be made within the
15 fifteen minutes.

16 COMMISSIONER CARR: That's over a year ago?

17 MR. AGNES: Yes.

18 COMMISSIONER CARR: Well, is it getting better?

19 MR. AGNES: Well, I indicated that there were still
20 some outstanding concerns about the communications system. It
21 certainly has gotten better, because one of the devices that
22 had been proposed as a replacement for the old communications
23 system itself has been found to be inadequate and superseded by
24 a new system. That new system, however, has not been fully
25 tested.

1 COMMISSIONER CARR: Okay. According to our records,
2 at a FEMA meeting in Boston on 14 August '87, attended by you
3 and Mr. Lovering and Mr. Hausner, you stated that you had been
4 instructed by the Governor to develop the best possible plans
5 without delay, and you discussed a schedule that would complete
6 all activities by 12/31/87.

7 To what do you attribute your inability to accomplish
8 that? Was it inadequate effort, inadequate skill, inadequate
9 followup, inadequate resources, people, money? Would you give
10 me a little discussion on how you didn't meet your goal?

11 MR. AGNES: I have never placed a date for the
12 completion of emergency planning, and I would take issue with
13 whatever report your comment is based on. I categorically
14 would deny that I ever said that.

15 COMMISSIONER CARR: Hmm? You agree with that? He
16 didn't give a date?

17 MR. HAUSNER: That's right.

18 COMMISSIONER CARR: Why would the people that were
19 there imply that, I wonder?

20 MR. HAUSNER: I have no idea.

21 MR. AGNES: Why would the people who presented
22 material to you on October 14th misrepresent the facts? I
23 don't know, Commissioner.

24 COMMISSIONER CARR: Well, what is your date? Do you
25 have one?

1 MR. AGNES: I have not done that, Commissioner, for
2 the same reason, I think, that the Commission has learned that
3 when dates have been applied to the restart of this plant, at
4 least to my knowledge, several times they have not been met,
5 because there are simply events that are beyond the control of
6 any one individual or agency with regard to the successful
7 completion of that project.

8 I indicated to you that our planning process involves
9 local government, state government, and the licensee. The
10 licensee fully supported that process in the early part of 1987
11 and has been party to it ever since, and that process calls for
12 development at the local level, submission to the state,
13 submission to FEMA, and it's simply taking a long time, because
14 it's a very complicated task.

15 COMMISSIONER CARR: You've been notified by FEMA
16 since 1981 of deficiencies in your planning.

17 MR. AGNES: After exercises, yes.

18 COMMISSIONER CARR: How much money have you spent
19 since '81 in correcting those?

20 MR. AGNES: Well, before the last fiscal year, the
21 figure would be difficult, because it would be based on sums
22 from several different departments that were not specifically
23 appropriated for nuclear emergency planning, but I could say
24 that it would involve the Civil Defense Agency, the Department
25 of Public Safety, the Department of Public Health, the

1 Executive Office of Public Safety. All of those agencies would
2 have contributed to the planning process and the correction of
3 deficiencies, and, of course, local government.

4 Since the fiscal --

5 COMMISSIONER CARR: Have you got a ballpark figure
6 since '81?

7 MR. AGNES: It's into the hundreds of thousands of
8 dollars.

9 COMMISSIONER CARR: How many people?

10 MR. AGNES: Well, there are eight or nine people
11 dedicated full-time in the Civil Defense Agency for emergency
12 planning for nuclear power plants at the moment. There are
13 people, as you heard, in all the local communities, some of
14 whom are volunteers and some of whom are from different
15 departments, who are dedicated full-time or part-time. There
16 are probably six or eight other people in state government who
17 are spending considerable amounts of their time on this issue.
18 So upwards of 30 or 40 state and local people spend most of
19 their time, I would estimate, on nuclear emergency planning
20 issues, as well as a substantial number of people that the
21 licensee has made available for this purpose.

22 And as we said, the number of meetings which are
23 documented in the attachment to our testimony is extraordinary.

24 COMMISSIONER CARR: Well, that's why I was asking, if
25 those meetings were still going on.

1 Would you classify those as productive?

2 MR. AGNES: I think they have been. I have attended
3 them periodically, not every single week, but they have
4 provided an opportunity, as some of the selectmen said, for the
5 local Civil Defense Directors to put their stamps on draft
6 material that might have come from several different places,
7 before it gets submitted to local government, provided an
8 opportunity for the licensee to exchange views with local and
9 state officials, and provided an opportunity for local
10 officials to share with each other experiences in their own
11 communities that might benefit each other. So I think they
12 have been useful.

13 COMMISSIONER CARR: You're familiar with the six
14 deficiencies that FEMA identified?

15 MR. AGNES: Yes.

16 COMMISSIONER CARR: In your opinion, are any of those
17 completed?

18 MR. AGNES: I think one of the deficiencies had to do
19 with the general nature of the State's resolve, if you will, in
20 emergency planning, and I would hope from what you've heard in
21 the material that we've submitted that there is no question but
22 that the State is working as hard as it can with local
23 government.

24 In the other areas, I would say that there remain in
25 each one of those areas some unresolved issues.

1 COMMISSIONER CARR: Of the remaining five, which one
2 is going to be the toughest?

3 MR. AGNES: I don't think I could say that,
4 Commissioner.

5 COMMISSIONER CARR: Okay.

6 MR. AGNES: I would add, though, when you say "the
7 remaining five," we might characterize them somewhat
8 differently, but I would hope you would include in that list
9 the need for an exercise, which is not specifically listed, I
10 don't believe.

11 COMMISSIONER CARR: I'm talking about the ones they
12 listed.

13 MR. AGNES: Well, that was one of the other concerns
14 that we had, and I appreciate the judgment on restart is a
15 judgment that you have to make. It's not a judgment that state
16 or local government has to make. But again, we have, in good
17 faith, given you three very lengthy reports in which we have
18 expressed our views, and we would hope, as you consider FEMA's
19 concerns, that you would also take ours at least into
20 consideration.

21 COMMISSIONER CARR: Okay. The city of Taunton has
22 stated that its reception center could handle more than 20
23 percent of the EPZ population. Does your office agree with
24 that?

25 MR. AGNES: Well, "handle" is a word that I think

1 requires some further definition. If you mean that more than
2 20 percent of the population could --

3 COMMISSIONER CARR: Well, let's rephrase. Whatever a
4 reception center is supposed to do. Could they take more than
5 20 percent of the EPZ population.

6 MR. AGNES: Well, whether you use the word "take" or
7 "handle," my point is simply this. When you talk about either
8 of those two terms, do you mean simply be able to process
9 people through the reception center in the sense that people
10 can park their car there?

11 COMMISSIONER CARR: Well, what does the State expect
12 the reception center to do?

13 MR. AGNES: Well, we expect that radiological
14 monitoring and decontamination has to take place there. We
15 expect that people who might require a change of clothing be
16 provided with a change of clothing and a facility to take a
17 shower. People have to at least be given an opportunity to be
18 referred to --

19 COMMISSIONER CARR: Okay. I understand that.

20 MR. AGNES: Quite a number of those details.

21 COMMISSIONER CARR: Can they handle 20 percent?

22 MR. AGNES: I'm not certain of that.

23 COMMISSIONER CARR: If a non-nuclear accident similar
24 to Springfield's fire occurred in the Area 2 tomorrow, could
25 MCDA handle it?

1 MR. AGNES: Again, we try to handle anything that we
2 have to, because our responsibility is to the health and safety
3 of citizens. But I should first say that with regard to the
4 Springfield incident, with which I am quite familiar, the
5 people who were evacuated were approximately 25,000 to 30,000,
6 not 70,000. The incident occurred over the course of several
7 days, giving local officials, who did an outstanding job by the
8 way, an opportunity to evacuate people in a relatively
9 efficient and orderly manner, and the spill, although of rather
10 vast proportions, nevertheless was in many respects brought to
11 the upper atmosphere and did not have some of the dangerous
12 effects that we might otherwise experience.

13 Also MCDA is not a first-response agency, and that's
14 an important point. MCDA is an agency that coordinates the
15 response.

16 COMMISSIONER CARR: Yes. I didn't get the impression
17 that you all were the prime actors in that. But the planning,
18 I would say, was in an embryonic state for that emergency.

19 MR. AGNES: Quite to the contrary. The city of
20 Springfield has one of the most sophisticated, comprehensive
21 emergency response plans.

22 COMMISSIONER CARR: Even better now.

23 MR. AGNES: I think so, yes, thanks to a great deal
24 of work by the city and MCDA. But they will tell you -- at
25 least the emergency personnel have told me -- that but for the

1 SARA Title III program, for example, and the work that they
2 have done, we might have had a very different result there.

3 COMMISSIONER CARR: Is there any hazardous
4 substances-producing, using storing area -- are there any of
5 those in Area 2?

6 MR. AGNES: Yes.

7 COMMISSIONER CARR: And do you have those plans,
8 then, in SARA III for 2?

9 MR. AGNES: I can't say for certain that each of the
10 EPZ communities in the Plymouth area have them, but I think
11 that they do.

12 COMMISSIONER CARR: And are you coordinating -- does
13 MERC -- it looks like the same people are involved in MERC that
14 are involved in radiological planning, so you're taking
15 advantage of each other's --

16 MR. AGNES: It's the same agency. Two separate
17 units.

18 COMMISSIONER CARR: So if the plans are available in
19 one area, I assume they would be available to be used in the
20 other situation.

21 MR. AGNES: The plans would obviously be available.
22 As you know, the planning basis is somewhat different.

23 COMMISSIONER CARR: Somewhat different, yes.

24 While we're on that, who is responsible for taking
25 care of these disadvantaged that we were talking about awhile

1 ago. It's not her responsibility; it's a state responsibility?

2 MR. AGNES: I think it's a state responsibility with
3 the licensee's support. And I say that for two reasons.

4 First, the federal regulatory guidance suggests that
5 the licensee should support the State's efforts, and the
6 licensee in this case has been supportive.

7 And secondly, the licensee has essentially, as I
8 said, bought into our planning process, and we have been
9 working for two and a half years in part on trying to solve
10 this problem of persons with special needs.

11 Now we have made advances, but the issue of the
12 survey has been a stumbling block, and it is important to us
13 because it is -- it will be the first time, to my knowledge,
14 that a scientific survey will have been done to try to identify
15 who the people are who may have a disability and need help in
16 an evacuation. We depend on people to self-identify to some
17 extent. We depend upon local officials to know the people in
18 their community to some extent. But you never know for
19 certain how many people with disabilities you may have in your
20 community who may need assistance.

21 COMMISSIONER CARR: Will next year's census-taking
22 take care of that?

23 MR. AGNES: I can't answer that. I'd be guided by
24 Ms. Waitkus on that question.

25 COMMISSIONER CARR: Never mind. One more question

1 for you.

2 MR. AGNES: Yes, sir.

3 COMMISSIONER CARR: I noticed The Globe article that
4 was done on you recently says that --

5 CHAIRMAN ZECH: You can ask Ms. Waitkus, if you'd
6 like to.

7 COMMISSIONER CARR: I gave her a --

8 CHAIRMAN ZECH: Would you mind taking the microphone,
9 please, Mr. Waitkus, right there?

10 COMMISSIONER CARR: Your survey that you're writing,
11 I was curious if we're going to run a census next year, I was
12 wondering, does the census record whether or not the people in
13 the homes are --

14 MS. WAITKUS-ARNOLD: First I'd like to say that I
15 really resent your term "disadvantaged" when it comes to people
16 who are elderly and disabled.

17 COMMISSIONER CARR: Well, whatever.

18 MS. WAITKUS-ARNOLD: It's not "whatever." It's a
19 serious term to use.

20 COMMISSIONER CARR: I'm elderly.

21 MS. WAITKUS-ARNOLD: Then you must be disadvantaged,
22 in your mind, huh?

23 COMMISSIONER CARR: You can see that.

24 MS. WAITKUS-ARNOLD: I don't feel disadvantaged.

25 This survey, you can never find all people who need

1 assistance. You can get rough estimates. Say we know the 17
2 percent, and we're going to have to plan to have transportation
3 and expert individuals trained, who have expertise in issues
4 for maybe 15 or 14 percent of the population.

5 COMMISSIONER CARR: No. My question was --

6 MS. WAITKUS-ARNOLD: What were you saying?

7 COMMISSIONER CARR: In the census that's taken next
8 year, do you know if that will provide these data?

9 MS. WAITKUS-ARNOLD: Not the census, no. A survey
10 like this might, a comprehensive survey. The census will not,
11 no.

12 COMMISSIONER CARR: Will not?

13 MS. WAITKUS-ARNOLD: No, absolutely not.

14 CHAIRMAN ZECH: Thank you.

15 COMMISSIONER CARR: Thank you.

16 Back to The Globe article. I notice that it says,
17 you say getting involved in controversies makes life exciting
18 for you. Does solving problems make it equally exciting?

19 MR. AGNES: It is, Commissioner, when you can solve
20 the problem. And when you can't solve the problem, it's
21 sometimes frustrating.

22 COMMISSIONER CARR: Okay. That's all I've got.

23 CHAIRMAN ZECH: Commissioner Rogers?

24 COMMISSIONER ROGERS: Well, we've all been here a
25 long time, and I don't want to prolong this unduly. But what

1 is your view towards the question of whether the individual
2 towns are availing themselves of consultants that could help to
3 assist them in organizing their efforts in ways that might lead
4 to a little more rapid conclusion?

5 Obviously there's a lot of dedicated volunteer
6 efforts that are being contributed to these problems in each
7 town, and I'm sure people are working very hard and spending an
8 enormous amount of time. But are they trying to reinvent the
9 wheel here with respect to emergency planning?

10 There is some expertise that undoubtedly exists and
11 that can be brought to bear and shared. What is the State's
12 position with respect to what you can do to try to assist, to
13 make the process streamlined a little bit better and make sure
14 that people are not unduly debating issues that somehow or
15 other really have been settled on a professional basis long
16 ago?

17 MR. AGNES: In my opinion, Commissioner, 100 more
18 consultants would not speed the process up, but, in fact,
19 retard it. There has been no lack of assistance from outside
20 sources during the last two and a half years of emergency
21 planning.

22 The licensee has made an enormous outlay of
23 expenditures for emergency planning consultants. The State
24 has had staff full-time working with local governments.

25 But what I think you heard today, what I hope you

1 heard today, was the unrelenting desire and responsibility felt
2 by local communities to put their own stamp of approval and
3 mark on this planning material, or else it doesn't represent
4 their plan, that they feel that their people can implement, but
5 it represents something out of a book. When the emergency
6 occurs, the consultants aren't going to be there. The fire
7 chief, the police chief, the public works director -- those are
8 the people who are going to get a call at 2:00 o'clock in the
9 morning, and those are the people who have to understand the
10 plan, and it has to be one that fits with the community.

11 So it is a cumbersome process. It is time-consuming.
12 But I think all of the parties have worked just as hard as they
13 possibly can, and it's simply not complete.

14 CHAIRMAN ZECH: Commissioner Curtiss?

15 COMMISSIONER CURTISS: Yes. I guess I have a number
16 of questions here. I want to clean up one that Commissioner
17 Carr raised, first of all.

18 When was the Springfield incident?

19 MR. AGNES: Oh, I think it was in June of this year.

20 COMMISSIONER CURTISS: You mentioned in the
21 discussion that the work that the State had undertaken under
22 the community right-to-know provisions, which became effective
23 July 1st of '88, contributed substantially to your ability to
24 undertake the evacuation in the Springfield incident.

25 Is there something that might give you a leg up on

1 what you're doing here in the nuclear area?

2 MR. AGNES: I don't think that the emergency planning
3 part of the SARA Title III program is particularly relevant to
4 the problem that we are facing here, because the problem is, in
5 part, that the planning process simply has not been completed,
6 not that people don't understand what it is they're supposed to
7 do, just that it hasn't been completed, and secondly that we
8 feel that it is so complex, that to give you any assurance that
9 we think the plans can be implemented, we think there ought to
10 be a full-scale exercise.

11 So the fact that you might have three other kinds of
12 comprehensive emergency plans sitting side-by-side in your
13 community is not going to help you resolve those two issues.

14 COMMISSIONER CURTISS: Have you exercised a plan
15 under the SARA legislation for your chemical plants?

16 MR. AGNES: Springfield did.

17 COMMISSIONER CURTISS: Has the whole state?

18 MR. AGNES: No.

19 COMMISSIONER CURTISS: Okay. Let me shift gears for
20 a minute.

21 I'm a little bit confused about your statement on
22 page 3 of the testimony where you indicate that you will not
23 support the restart of the Pilgrim Station until the
24 requirements of NUREG-0654 and all other regulatory criteria
25 are satisfied.

1 What are those "other regulatory criteria" that you
2 would urge us to consider?

3 MR. AGNES: Well, one that comes to mind obviously is
4 the requirement of the biennial exercise, which I understand
5 there is an exemption which extends to the end of this calendar
6 year.

7 There is also a requirement for emergency planning
8 information, which we're working with the licensee to produce
9 and distribute to people in the EPZ.

10 COMMISSIONER CURTISS: Are they all federal criteria,
11 or are there --

12 MR. AGNES: Yes. My point was to indicate that we
13 obviously are insisting that all of the applicable federal
14 criteria be met, and as you know --

15 COMMISSIONER CURTISS: I understand that.

16 MR. AGNES: -- there is a certain amount of guidance
17 material that is published by FEMA in connection with NUREG-
18 0654, which we're constantly reviewing.

19 COMMISSIONER CURTISS: Are there requirements beyond
20 the federal criteria that need to be met here, or is it just
21 the federal requirements that we should be looking at?

22 MR. AGNES: Well, we certainly would hope you might
23 agree with some of the proposals that we have advanced in our
24 three previous reports regarding health and safety issues.
25 We're not expecting you as federal regulators to be bound by

1 things we might recommend that should be done, such as improved
2 monitoring systems, computer-linked between the plant and the
3 state, for example, such as they have in Illinois, or
4 enhancements of that sort.

5 We certainly have recommended them to you in the
6 past, as I know others have, and we would recommend them to you
7 in the future. But we're here today to simply point out to you
8 that we don't think the applicable federal regulatory
9 requirements have been met.

10 COMMISSIONER CURTISS: Well, let me discuss two of
11 them, because one you mentioned in your testimony, and that's
12 the adequacy of shelter as a protective action.

13 If we address that issue to FEMA's satisfaction,
14 would that resolve that issue, in your judgment?

15 MR. AGNES: First of all, as you might have gleaned
16 from some correspondence between FEMA and the State, I don't
17 understand the FEMA position, and I don't know, for example, if
18 the NRC has adopted the FEMA position on sheltering. All I
19 know is that FEMA has apparently changed its view on
20 sheltering. I don't quite understand exactly what their view
21 is today.

22 So I can't answer that question.

23 COMMISSIONER CURTISS: Well, if we can clarify what
24 their view is, and if their view is, in fact, that the
25 sheltering for huge populations is not necessary to meet the

1 federal criteria, would that address --

2 MR. PARLER: Mr. Chairman?

3 CHAIRMAN ZECH: Yes.

4 MR. PARLER: The issue in general that's being
5 discussed might be a contested issue in other proceedings. I
6 apologize for interrupting, but --

7 COMMISSIONER CURTISS: All right. I'll move on to my
8 next example, then.

9 If we were satisfied that the state of emergency
10 preparedness within the 10-mile emergency planning zone was
11 sufficient to protect the public health and safety, does that
12 discharge our responsibility, or in your judgment, would we
13 need to find that emergency preparedness is sufficient beyond
14 10 miles in order to meet that finding?

15 MR. AGNES: Well, the emergency planning zone,
16 according to the guidance, as I understand it, is supposed to
17 be approximately ten miles. We have indicated, for example,
18 and we will try to supply you with the additional
19 correspondence that may go beyond what the town of Bourne has
20 given you, that we think that the towns of Bourne, Plimpton,
21 and Wareham ought to be included in the EPZ, as well as the
22 rest of the town of Marshfield, Marshfield having only about 10
23 percent of its population in the EPZ.

24 Now that is a decision which we've made as a state.
25 We've gone as far as we can. We've notified FEMA, and we've

1 notified the NRC. I don't know what the position of the NRC is
2 frankly, because we've never been given any official response.

3 COMMISSIONER CURTISS: Do you have a state law on the
4 size of the EPZ?

5 MR. AGNES: Yes.

6 COMMISSIONER CURTISS: And what is that?

7 MR. AGNES: It indicates that there is an authority
8 within state government to designate so-called nuclear power
9 plant areas, I believe, for planning purposes, and we have done
10 as much as we can under that authority to indicate that we
11 consider those communities to be part of nuclear power plant
12 planning areas.

13 COMMISSIONER CURTISS: How far is Barnstable from the
14 plant?

15 MR. AGNES: It's further south than Bourne. I can't
16 tell you exactly what the distance is. The Cape, as you know,
17 curves, and so the actual distance as the crow flies might be
18 closer than some areas that by car are closer.

19 COMMISSIONER CURTISS: I have one final question. In
20 your statement at a number of points, you alluded to the lack
21 of guidance and response from FEMA, and in particular seemed to
22 suggest an interest on the part of the State to get FEMA more
23 actively involved in assisting you to carry out the two
24 respective emergency planning responsibilities.

25 In late August of this year, they asked you to

1 provide a schedule of milestones for when you intended to carry
2 out the various responsibilities that you have, on the basis of
3 their judgment that that would enhance the ability to complete
4 the actions.

5 Is that something that you just disagree with them
6 about, that setting milestones and schedules, as they have
7 suggested, would not contribute to moving forward?

8 MR. AGNES: Well, we said in our response, and we've
9 said before, that milestones in the sense of objectives are
10 patently obvious. We want the very best possible plans. We've
11 been following NUREG-0654 and the federal guidance as best we
12 can. But dates by which things are going to be completed, in
13 our judgment, place artificial constraints that could seriously
14 impact on public safety, as some of the earlier speakers have
15 said, by creating pressures that people may feel to do things
16 by a certain deadline, when they may not be ready to do them
17 by.

18 And I would simply say that I hope you would respect
19 the decision of state and local governments with respect to
20 milestones, just as you respect a decision of your own staff
21 with respect to technical issues, that they are resolved when
22 they are resolved.

23 COMMISSIONER CURTISS: Thank you.

24 CHAIRMAN ZECH: I know that Massachusetts has
25 participated in the past on previous exercises at the Pilgrim

1 plant.

2 Are you familiar with those, Mr. Agnes, and if you
3 are, could you give us perhaps your views of the results of
4 those exercises?

5 MR. AGNES: I'm not familiar from having personally
6 participated, but in our first report, which we did for the
7 Governor in December of '86 and which we provided to the
8 Commission, we documented the history of those previous
9 exercises, and in each case with regard to the pre-1986
10 emergency plans, there were exercises; deficiencies were noted;
11 in some cases, remedial exercises were held to correct those;
12 and FEMA awarded the interim finding of adequacy or approval,
13 which, as you know, of course, was withdrawn in 1987.

14 CHAIRMAN ZECH: Did you or the State participate in
15 making any recommendations or concerns regarding those
16 deficiencies in those exercises; do you recall?

17 MR. AGNES: In the pre-1986?

18 CHAIRMAN ZECH: Previous, yes.

19 MR. AGNES: Yes, the State did, I believe.

20 CHAIRMAN ZECH: Yes. And as far as those
21 deficiencies are concerned, those are the ones that, of course,
22 we're aware of and are being addressed.

23 Could you give your views on how those are being
24 addressed at the moment, those deficiencies specifically?

25 MR. AGNES: Well, when we issued our report in

1 December of '86, what we attempted to do was to compile all of
2 the outstanding items that we considered to be deficiencies
3 previously identified or deficiencies that we had identified,
4 and that has been the basis of the planning effort since that
5 time.

6 CHAIRMAN ZECH: I understand. And then as you
7 pointed out, you're not satisfied at this stage with the
8 training and with the emergency plans as they stand.

9 Could you -- do you think that even though you're not
10 satisfied, have they been improved over the past plans that
11 were in effect when the plant has been operating before?

12 MR. AGNES: Well, there is a sense, I think, in which
13 you can say yes, that you can make a judgment that because of
14 the effort and the consideration of factors which were not
15 considered in the past, that there has been an improvement.

16 But you can never really make that judgment with the
17 kind of confidence, I think, we all want to have before we
18 confront an accident without having had an exercise and a test.

19 CHAIRMAN ZECH: I agree. Just because they've
20 improved doesn't mean that they're necessarily adequate. But
21 the point is that we had a plan before. There were exercises
22 done on it. There were deficiencies. We've addressed the
23 deficiencies. We've put those on the table. And apparently
24 from what we've heard from others, too, it would appear, as you
25 state too, I believe, that there have been improvements made in

1 that plan that we've been using for a number years.

2 I guess the other thing I'd appreciate your views on
3 is, again I recognize that the State of Massachusetts and the
4 New England area in its entirety has a reputation for being
5 able to handle other casualties than the nuclear casualties,
6 and it has over the past.

7 Could you give us, in your role as a state official,
8 your view as regards the capability of your state and others in
9 the area to handle natural disasters, excluding the nuclear
10 disaster?

11 MR. AGNES: I think with respect to the common range
12 of natural disasters -- snowstorms, floods, hurricanes --
13 experienced public safety officials will always tell you
14 frankly that they're scared to death of having to confront such
15 a disaster, because no two are alike.

16 At the same time, I think we have some of the very
17 best officials at the state and local level, who have been
18 through a great deal, who are competent, who are well-trained.
19 But I think the very best people will frankly tell you that no
20 one is confident that you're going to make it through the next
21 so-called disaster, just because you may have survived the last
22 one.

23 CHAIRMAN ZECH: Well, of course, it's the same thing
24 that we're involved with all the time. You can't have any
25 guarantees, but you want to make the best judgment you possibly

1 can, so that, as we say, "reasonable assurance" is provided
2 that adequate protection would be there, and that, of course,
3 is what we both want, I think, Mr. Agnes.

4 Are there any other questions from my colleagues?

5 COMMISSIONER CARR: I need two things. When did the
6 State ask NRC and FEMA for expansion of EPZ to
7 Bourne/Wareham/Plimpton? I don't have that in my file.

8 MR. AGNES: It would be approximately in the
9 summer/fall of 1987, I think. The correspondence that you have
10 from the town of Bourne --

11 COMMISSIONER CARR: Well, that shows they didn't ask
12 you until late '87.

13 MR. AGNES: Well, I think my recollection is that
14 there is some correspondence that starts in the spring, and it
15 goes through August, and I think we had meetings in that period
16 with NRC.

17 COMMISSIONER CARR: But your letter has come to us,
18 you think?

19 MR. AGNES: Oh, yes. We'll produce that, if you
20 don't have it in your file.

21 COMMISSIONER CARR: Okay. And I need to correct the
22 record on the Springfield fire. It happened at 10:13 on June
23 17th of this year. They evacuated 30,000 people that afternoon
24 out a mile and a half. They let some of them back in Saturday
25 morning. Then they had to re-evacuate about 50,000 four miles

1 the next day, and then -- so it was over a three-day period,
2 they moved 70,000 people in and out and around. So that will
3 make the record a little more agreeable with --

4 MR. AGNES: Well, our estimates were 25,000 to
5 30,000, but those are judgment matters, and I respect your --

6 COMMISSIONER CARR: Well, that's out of the mayor's
7 office.

8 CHAIRMAN ZECH: All right. Thank you very much, Mr.
9 Agnes. We appreciate you and your colleagues being with us
10 today.

11 MR. AGNES: Thank you.

12 CHAIRMAN ZECH: And I would suggest, if there's no
13 objection, we take a fifteen-minute recess right now, and we'll
14 come back again in fifteen minutes, 5:40.

15 [Brief recess.]

16 CHAIRMAN ZECH: Good afternoon, ladies and gentlemen.
17 We will continue this afternoon's meeting with a
18 presentation by the Staff.

19 Mr. Stello, you may proceed.

20 MR. STELLO: Thank you, Mr. Chairman.

21 I will make a very few brief points to begin with and
22 turn very quickly to Bill Russell, and we'll try to -- I know
23 the Commission must be tired by now -- to go through the points
24 that we think are important, based on what you've heard.

25 But the most important one, I think, we need to start

1 with is, first you've heard an awful lot now for the last
2 several hours on emergency planning, and that is an important
3 issue, I agree and concur, but I must remind the Commission
4 that the reason that this plant was shut down was because of
5 its poor performance, both from the equipment point of view as
6 well as performance of people in management.

7 So we want to at least spend a few moments to talk
8 about those issues and summarize the status of the plant in
9 that regard, and then we will get into the emergency planning
10 issues, and then finally we'll tell the Commission where I
11 think we come out, based on what we've heard and our
12 understanding of where we are today at the end.

13 So with that brief introduction, let me ask Bill to
14 give you a summary of the overall status of the plant.

15 CHAIRMAN ZECH: Thank you very much. Mr. Russell,
16 you may proceed.

17 MR. RUSSELL: Let me start out by first saying that
18 the technical issues which were identified in the Confirmation
19 of Action Letter 86-10, which was the original basis for the
20 shutdown, have been corrected, and to the extent that they can
21 be tested in a shutdown plant, we are satisfied that they have
22 been resolved.

23 We supplemented that Confirmation of Action Letter to
24 require in addition a formal assessment of the readiness of the
25 plant for operation and a formal restart plan by the licensee,

1 including a power ascension plan. That required NRC review and
2 approval.

3 At the last meeting, I reviewed the status of our
4 review of their readiness for operation and did briefly discuss
5 the power ascension program. I thought it would be useful to
6 describe what that program is and the fact that it would be, in
7 another supplement to the Confirmation of Action Letter,
8 Supplement 2, which I would issue subject obviously to
9 Commission approval.

10 The testing program would involve a four-to-six-month
11 period of close monitoring by the Staff. There would be
12 periods of time that would have around-the-clock coverage. It
13 has built in to it a number of hold points, the first one being
14 initial criticality, and then 5 percent, 25 percent, 50
15 percent, 75 percent, and then 100 percent. Now the 100 percent
16 hold point would be the point at which we would reduce from the
17 augmented inspection coverage back to more normal inspection
18 coverage.

19 There is a formal review and recommendation against
20 established criteria for each hold point, and that review is
21 done by a joint review by NRR and Region I senior managers
22 through the Restart Assessment Panel, and they will provide a
23 report to me, which then I will use as the basis for making a
24 judgment.

25 The Restart Panel, in addition to looking at both

1 technical issues and management performance, has been receiving
2 periodic reports on the status of emergency preparedness from
3 Dr. Bellamy and others. That status would also be available.

4 Since the October 14th Commission meeting, I'd like
5 to review the status of the facility. At that time, I
6 indicated it would be a few days until the facility would be
7 physically ready for restart. However, on the 14th, that
8 afternoon during the Commission meeting, an NRC inspector
9 identified concerns with some anchor bolts that were for large
10 structural supports for piping at the point where the piping
11 enters the drywell.

12 These anchor bolts were tack welded. When the tack
13 welds were removed and the anchor bolts tested, it was found
14 that two were not properly installed.

15 CHAIRMAN ZECH: Two of how many?

16 MR. RUSSELL: There were ten large supports. I don't
17 know the exact number of anchor bolts, but it would be many, in
18 the few hundreds.

19 CHAIRMAN ZECH: Did you check them all?

20 MR. RUSSELL: There was an extensive program of
21 testing other anchor bolts, looking for others. There were
22 others that were found, but with a 95 percent confidence level,
23 which is identical to that used in the I&E bulletin. They were
24 found to be satisfactory, and they were operable -- that is,
25 with factors of safety of 2. The supports would still

1 function, even though there were some loose anchor bolts in the
2 supports, so that while the issues were pursued, we did
3 conclude that they were operable. We documented this in an
4 inspection report, provided the inspection report in an update
5 memorandum to the Commission on November the 29th.

6 There are some remaining final calculations that the
7 Staff is treating on a routine basis that will be closed out in
8 an inspection report, but the effort has now been completed by
9 the licensee.

10 There was earlier in the testimony mention of a spill
11 which occurred on the 16th of November. It was essentially an
12 activity in the truck bay at the facility. Demineralized
13 water was being added to a vessel that had contamination in it.
14 It was thought that the filling process had been terminated and
15 was secured. It was not adequately secured. The scene was
16 left by the contractor involved in the activity. There was an
17 overflow. It did progress outside of the truck bay into the
18 parking lot area, up to the fence of the protected area.

19 We have reviewed the short-term actions taken by the
20 licensee, which have included cleanup of the area and
21 termination of those types of activities and the longer-term
22 plans for some physical design modifications in the area, and
23 we are satisfied with the administrative controls that they
24 have imposed, such that that would not reoccur.

25 There was no contamination off the protected area of

1 the facility, and there were samples in the environment that
2 were done both by the Massachusetts Department of Health, as
3 well as the licensee, and those all showed negative results.

4 The licensee is currently maintaining what I would
5 characterize as a two to three-day rolling schedule of
6 surveillance activity and some corrective maintenance. The
7 licensee's objective is to complete those things now, so that
8 there will be a longer period of time potentially of operation
9 for known work. There clearly is going to be other activity
10 that comes up, and it may be necessary for a shutdown, as I
11 have previously described. The plant has not operated for some
12 two and a half years. It has not been up to temperature and
13 pressure, and we expect that the low-power period of operation,
14 up to 5 percent, could take four to six weeks to complete and
15 may, in fact, require a shutdown prior to the scheduled
16 shutdown from outside the control room.

17 Overall, we feel that the technical and the
18 management issues which were the basis for the shutdown have
19 been resolved and that the facility is ready for restart. We
20 reaffirmed that conclusion in our November 29th memorandum.

21 CHAIRMAN ZECH: Thank you very much.

22 Dr. Murley, are you --

23 MR. MURLEY: Yes. Thank you, Mr. Chairman.

24 CHAIRMAN ZECH: Proceed.

25 MR. MURLEY: In order to develop fully the Staff's

1 conclusions and recommendations, I will repeat briefly some of
2 the background from the October 14th meeting.

3 Regarding the recent history of emergency
4 preparedness at Pilgrim, in June 1981 the initial plans were
5 submitted to FEMA by the Commonwealth of Massachusetts. They
6 were reviewed, revised, and resubmitted in October 1981.

7 In March 1982, the first full-scale exercise was held
8 at Pilgrim. Several deficiencies were noted by FEMA, and in
9 September of 1982, FEMA issued an interim finding that the
10 state and local response was adequate.

11 In June of 1983, the second full-scale exercise was
12 held. I was the Regional Administrator in Region I at the
13 time, and I personally observed that exercise with the FEMA
14 Regional Director. I saw the -- started out observing the
15 exercise in the control room. I moved to the technical support
16 center, to the emergency operations facility, which at that
17 time was a series of trailers adjacent to the site, and I then
18 observed the local activities in Plymouth at, I believe it was
19 the armory.

20 There it was clear that the resources and the
21 communications facilities were in place. I was impressed, as a
22 matter of fact. And I recall the state official at that time
23 came in by helicopter from Boston to the emergency operations
24 facility. I observed the local civil defense, the local
25 police, the local Coast Guard liaison, and as I said, their

1 liaison with their state civil defense facility in Framingham.

2 From that exercise in June of '83, FEMA issued a
3 finding of adequacy, although here again there were several
4 deficiencies noted.

5 I did not observe evacuations. We do not in our
6 exercises require evacuations to be done as a rule. We mainly
7 look at facilities and at personnel and communications
8 equipment and that sort of thing in an emergency.

9 As I mentioned, many of those things I did personally
10 observe in June of 1983.

11 In August of 1984, there was a drill, which is sort
12 of a partial exercise, at which FEMA made a finding of
13 adequacy, and they found one deficiency at that time.

14 In 1985, FEMA wrote to Massachusetts and told the
15 Commonwealth that there were several planning problems
16 unresolved, and they stressed that the Commonwealth was not
17 making progress in corrective actions toward those
18 deficiencies.

19 In September of 1985, there was yet another full-
20 scale exercise in which four deficiencies were observed.

21 There was a remedial exercise the following month,
22 October of 1985, that corrected the deficiencies, after which
23 there was a FEMA finding of state and local response adequacy.

24 Six months later, as we know, in April 1986, the
25 plant was shut down, and later on in that year, in December of

1 1986, Secretary Berry sent a report to NRC and FEMA that
2 described the problems that the Commonwealth of Massachusetts
3 saw with emergency planning at the site.

4 In August of 1987, FEMA issued the report to NRC of
5 their findings from their self-initiated review. In that
6 report, they highlighted six major deficiencies that they
7 found. They found that the offsite emergency preparedness
8 generally had deteriorated, and they could no longer make the
9 finding that state and local plans were adequate.

10 Here it's important to emphasize --

11 CHAIRMAN ZECH: Excuse me. Would you say that
12 again? What was the principal reason for making that finding
13 again?

14 MR. MURLEY: There were six major deficiencies.
15 Overall, there was a general finding that the emergency
16 preparedness was inadequate, and they could not longer make the
17 finding that state and local plans were adequate.

18 CHAIRMAN ZECH: Overall; is that what you're saying?

19 MR. MURLEY: Yes.

20 CHAIRMAN ZECH: All right.

21 MR. MURLEY: And here, I think it's important to
22 emphasize --

23 CHAIRMAN ZECH: Because of those six specific
24 findings?

25 MR. MURLEY: Yes, yes.

1 CHAIRMAN ZECH: Okay. In other words, the totality
2 of the six of them? Is that what was meant?

3 MR. MURLEY: That is what led FEMA to conclude --

4 CHAIRMAN ZECH: All right. You may proceed.

5 MR. MURLEY: It's important to recognize that the six
6 deficiencies that FEMA found were all in the area of planning.
7 They were not deficiencies in execution during the exercise,
8 for example.

9 The plant was already shutdown at that time, of
10 course, and we concluded that there was no need to take any
11 enforcement action. Boston Edison, we knew, had been working
12 with the state and local officials to improve the plans, and we
13 could see at that time -- and this was in August of 1987 --
14 that improvements were being made. In fact, Boston Edison
15 testified recently on October 14th that they have spent now \$10
16 million on improvements to the plans and facilities in the
17 emergency planning zone, and they intend to spend about \$5
18 million more, according to their testimony.

19 Nonetheless, there is more work that needs to be done
20 before we can receive a finding of adequacy from FEMA. There
21 must be complete plans and procedures developed by the towns.
22 The state must submit the final plans to FEMA. FEMA must
23 review and approve the plans and schedule an exercise. The
24 exercise must be conducted, and any deficiencies must be
25 corrected. And finally, FEMA must issue to the NRC a formal

1 report of a finding of adequacy.

2 We estimate that it would take about six months after
3 Massachusetts submits the final plans before we could receive
4 the final FEMA finding.

5 Our regulations do not require perfection in
6 emergency planning. In fact, it is not possible to guarantee
7 that emergency planning actions will protect all the people in
8 the emergency planning zone near a nuclear plant under all
9 accident conditions and in all weather conditions. Our
10 regulations recognize this reality, and they only require a
11 reasonable assurance finding that adequate protective actions
12 can and will be taken in the event of a radiological emergency.

13 We recognize that emergency planning is a dynamic
14 process, that perfection is not attainable, that deficiencies
15 will occur from time to time, and that deficiencies can be
16 corrected while the plant is operating.

17 Ron Bellamy will summarize the improvements that have
18 been made in the plans and NRC observations of these
19 improvements.

20 CHAIRMAN ZECH: All right, you may proceed.

21 MR. STELLO: If the Chairman would excuse me, before
22 Mr. Bellamy starts, we have attempted to try to -- and Mr.
23 Bellamy will -- identify some things that were discussed with
24 you this afternoon that we have a comment on, and those will be
25 incorporated directly in Mr. Bellamy's part that he covers.

1 CHAIRMAN ZECH: All right. Thank you very much. You
2 may proceed.

3 MR. BELLAMY: Thank you, sir.

4 Although emergency preparedness was not an issue for
5 the Pilgrim Plant shutdown in April 1986, FEMA began their
6 self-initiated review in September of 1986. The FEMA self-
7 initiated review was issued in August 1987, and identified six
8 specific planning issues.

9 Staff committed at the October 14, 1988 Commission
10 meeting to continue to assess the progress being made to fully
11 resolve the FEMA-identified issues in offsite emergency
12 preparedness.

13 Subsequent to that meeting, some local officials
14 requested meetings with the NRC Staff to review information
15 regarding emergency plans, implementing procedures, facilities
16 and resources. The Executive Director of Operations and other
17 senior staff, called Mr. Douglas Hatfield, the Plymouth Civil
18 Defense Director, at his request on October 21, 1988, and
19 offered to have Staff members meet with him.

20 The Staff subsequently met with him and the remaining
21 six Civil Defense Directors between October 25th and November
22 2nd, 1988. Discussions were held in the offices of the Civil
23 Defense Directors and included tours of the emergency operating
24 centers for the five towns within the 10-mile EPZ and the two
25 reception communities.

1 In two cases, selectmen were involved in these
2 discussions, and that was Mrs. Thompson of Plymouth and Mr.
3 Mazzilli of Carver. And the representative of the
4 Massachusetts Civil Defense Agency was present for the majority
5 of these discussions.

6 In addition, the Staff toured the Duxbury, Gurnet and
7 Saquish Beaches, with the head of the Duxbury Department of
8 Land and Natural Resources.

9 All the discussions with the local officials were
10 forthright and cordial. As a result of these meetings, a
11 review of correspondence since the October 14 meeting and Staff
12 inspections, additional information regarding the status of
13 emergency preparedness was reviewed. The status of emergency
14 plans, implementing procedures and other supporting documents
15 for the five towns within the 10-mile EPZ and the two reception
16 communities, is consistent with the status presented by the
17 Staff on October 14, 1988.

18 The emergency plan, implementing procedures, and
19 shelter implementation program from Marshfield, Carver and
20 Kingston have been submitted to the Massachusetts Civil Defense
21 Agency and forwarded to FEMA for a technical review.

22 The emergency plan and implementing procedures for
23 Taunton and Bridgewater have been submitted to MCDA and
24 forwarded to FEMA for a technical review.

25 Since the shelter implementation programs are for the

1 EPZ communities only, this program was not applicable to
2 Taunton and Bridgewater.

3 The emergency plan for the Massachusetts Civil
4 Defense Agency has been submitted to MCDA and forwarded to FEMA
5 for a technical review.

6 The emergency plan for Duxbury and Plymouth has been
7 submitted to MCDA and forwarded to FEMA for technical review.

8 For Plymouth and Duxbury, the procedures are not
9 complete. All procedures in Plymouth have been drafted, and
10 all except for three -- and these are for the Saguish/Gurnet
11 area -- monitoring and decontamination and the procedure for
12 Jordan Hospital have received department head approval.

13 For Jordan Hospital, EPZ residents would not be
14 treated and decontaminated there. This would be done at
15 facilities outside the emergency planning zone.

16 34 of the Plymouth procedures have received selectmen
17 approval, including the generic shelter manager procedure. The
18 33 individual shelter procedures which have been developed are
19 modeled after the shelter manager procedure, and it is our
20 understanding that they do not require individual approval.

21 Of the remaining procedures, 20 have received the
22 Civil Defense Directors' and the Radiological Emergency
23 Response Planning Committee's approvals, and are awaiting
24 selectmen review and approval.

25 Four procedures --special needs officer procedure, as

1 well as the three procedures that are awaiting department head
2 approval, have yet to be approved by the RERP Committee.

3 For Duxbury, all 38 procedures have been drafted, and
4 all except for three -- and these are the procedure for the
5 selectmen, the town manager, and the public information officer
6 -- have been reviewed by the department head and are in various
7 stages of review by the RERP committee and the selectmen.

8 This information was provided by the respective Civil
9 Defense Directors during the meetings with the Staff. Minutes
10 of these meetings were documented, and sent to each Civil
11 Defense Director, who agreed that the minutes factually and
12 accurately represented the discussions.

13 With respect to schools, the emergency plans identify
14 all the schools, they assign responsibilities for notification,
15 transportation resources, and protection of the children for
16 the five towns in the 10-mile EPZ.

17 Implementing procedures have been drafted for all
18 schools and approved at the department head level.
19 Subsequently the school superintendent for Marshfield has
20 indicated his dissatisfaction with this plan.

21 Several school committees have yet to approve the
22 procedures. The primary concern, as you have heard earlier, is
23 the philosophy on how and when school children would be
24 evacuated. Some school administrators would like to see the
25 children sent home at an alert. This is in conflict with the

1 Commonwealth and local Civil Defense Director's position, as
2 well as the police desire, which is to prevent traffic from
3 reentering the towns once an evacuation is ordered.

4 If the children are sent home at an alert, then the
5 children will be at home, and if traffic cannot reenter the EPZ
6 after an evacuation is ordered, parents would not be able to
7 get home to pick up their children.

8 Conversely, if the school children are evacuated at
9 an alert, and a subsequent evacuation of the general public is
10 ordered, parents would be able to be reunited with their
11 children, who would already be outside the EPZ. The plans as
12 drafted call for the staging of transportation at an alert, and
13 an evacuation of the school children at a site area emergency.

14 During the meetings with the Civil Defense Directors,
15 most did indicate that they would have the majority of people
16 necessary to implement the plans. But several of the towns are
17 short of volunteers to complete their staffing plans, primarily
18 for the second shift and non-technical positions.

19 Many of the positions that the local towns would
20 staff are not key positions, such as messengers and extra
21 communicators. The Staff believes that the plans could be
22 implemented with the existing resources.

23 The Staff has obtained an update of the status of the
24 offsite facilities, particularly the local EOCs. The Staff has
25 toured all of the local EOCs since the October 14, 1988

1 meeting. Based on these tours, but primarily based on the
2 input from the Civil Defense Directors, the status of the EOCs
3 is that the EOCs for Plymouth, Carver and Taunton are
4 functional.

5 The EOC for Kingston is nearly functional, with
6 telephone call routing problems noted and being corrected.
7 This EOC could be used in an emergency with minimal difficulty.

8 The EOC for Duxbury is also nearly functional, with
9 selected communication equipment installation to be completed.
10 This EOC could be used in an emergency with minimal difficulty.

11 The EOC for the reception community of Bridgewater
12 has been renovated and communications equipment is being
13 installed. The previous EOC, located in the same building,
14 could be used by installing some additional telephones.

15 The new EOC is better equipped than the old one and
16 could be used in an emergency with minimal difficulty.

17 The EOC for Marshfield is considerably behind the
18 other EOCs, but is expected to be completed this month. The
19 old EOC is still functional and could be used in an emergency.

20 It should be noted that the condition of the old EOCs
21 was not identified by FEMA as being a concern, and the new EOCs
22 are a significant improvement.

23 With respect to the notification system, significant
24 improvements have been made in the ability of Boston Edison to
25 notify the Commonwealth and local towns of an event. The

1 previous system relied on notification to the state police
2 dispatcher in Middleboro, Massachusetts, and subsequent
3 relaying of information to the local towns. The new digital
4 notification network has been installed and is operational.

5 This system automatically rings down to the
6 Commonwealth, each local warning point, which is the police or
7 fire department, which is manned 24 hours a day, or to the
8 local EOCs; except, as I have indicated, for the Marshfield
9 EOC. And it also rings in the state police when the phone is
10 picked up in the control room.

11 Additional capabilities at these facilities include
12 hard copy facsimile transmission capabilities.

13 During follow-up inspections, the Staff has obtained
14 specific information and an update with respect to
15 transportation needs and providers. The form and content of
16 the letters of agreement are now approved by the Commonwealth.
17 The letters of agreement address such issues as physical needs,
18 such as the number of buses and ambulances, mobilization times,
19 and driver resources.

20 To date, letters of agreement have been executed for
21 34 of the 35 transportation providers. These letters of
22 agreement represent transportation resources in excess of the
23 planned needs.

24 As an example, 954 buses have been committed in the
25 letters of agreement that have been signed, whereas 407 are

1 needed for plan implementation.

2 Similarly, resources are in excess for the vans, the
3 lift vans, the ambulances, bus drivers, and the emergency
4 medical teams.

5 Training of these providers is continuing. 521 of
6 the bus van drivers and 131 ambulance drivers have received
7 training to date. The Staff has audited several of the
8 training sessions for these transportation providers. The
9 training includes classroom training on radiation safety,
10 dosimetry, basic emergency preparedness, and specific
11 procedural assignments, and was subsequently followed by the
12 actual driving of designated transportation routes.

13 Based on this review, the Staff concludes that
14 adequate training is being provided to the transportation
15 providers. Training for these transportation providers is
16 scheduled for completion by January 31, 1989.

17 The level of training in the performance of emergency
18 responders was not identified as being deficient by FEMA.
19 However, most Civil Defense Directors indicated that training
20 does remain a concern. A total of 530 lesson plans are
21 required. 148 have been forwarded to the Commonwealth; 379 are
22 in various stages of review; and three have yet to be
23 developed.

24 To date, the Commonwealth has approved 14 lesson
25 plans, with two lesson plans having been approved since July

1 1988.

2 A maximum of 5800 individuals, needing approximately
3 25,000 manhours of training, have been identified. Of these,
4 2569 individuals have received 7811 hours of classroom training
5 pertaining to utilizing the approved lesson plans.

6 Generally each individual receives training
7 consisting of three hours of introductory and overview
8 training, in basic emergency preparedness, radiation safety and
9 dosimetry, and one hour specific training on implementing
10 procedures.

11 Of the training conducted to date, approximately 80
12 percent has been the introductory and overview training.

13 Staff review of the implementing procedures submitted
14 to FEMA -- submitted to MCDA and subsequently to FEMA -- shows
15 that they have been developed by position, and a simplified
16 checklist format with significant detail in the use of these
17 implementing procedures would be straightforward. With the few
18 exceptions previously noted for Plymouth and Duxbury, they have
19 been developed in concert with, extensively reviewed, and
20 approved by the department heads.

21 The Staff believes that the department heads
22 responsible for implementing these procedures during an
23 emergency are familiar with the content of these documents, and
24 can be expected to direct their staffs during an emergency.
25 Although the training is not scheduled to be completed until

1 March 31, 1989, the Staff concludes that the emergency plans
2 can be implemented, so that adequate protection of public
3 health and safety is assured.

4 For the special needs population, the Staff believes
5 that the responsibilities for identifying, notifying and
6 carrying out protective actions have been adequately
7 incorporated into the applicable town emergency plans and
8 implementing procedures.

9 The Civil Defense Directors have indicated to us that
10 each town has a special needs list, which was supplemented by
11 soliciting input from residents by newspaper advertisements.
12 The Commonwealth and Boston Edison are working out details to
13 conduct an additional special needs population survey.

14 Additionally, the public information brochure, which
15 will go to all EPZ residents, has provisions for allowing
16 special needs residents to identify themselves to town
17 officials. Although the Civil Defense Directors are not
18 convinced that all those with special needs have been
19 identified, they did not indicate that they thought there was a
20 significant unidentified special needs population in their
21 town. These lists are confidential, and some individuals are
22 reluctant to be so identified.

23 Nonetheless, the plans provide that an individual can
24 call the Civil Defense Office during an emergency and arrange
25 for transportation. Identification of the special needs

1 population, based on input from the Civil Defense Directors, is
2 a total of 686 individuals in the emergency planning zone. And
3 I do have that broken down by town.

4 This total number compares favorably to the expected
5 number of special needs population for the EPZ, which is 647
6 individuals, based on an EPZ population of 70,274, and a total
7 expected percentage of impaired individuals of 0.92 percent.

8 These numbers are from the evacuation time estimate
9 which NRC and FEMA have reviewed, and the percentage is from
10 annex end of the local hazardous material planning guide, which
11 has been supplied by the Commonwealth to all towns.

12 While the Staff recognizes that identification of
13 special needs population must occur on a continuing basis,
14 these numbers indicate that the Commonwealth and EPZ towns are
15 taking positive steps to identify this segment of the
16 population.

17 An issue that the Staff has continued to review in
18 detail is the emergency planning, specifically the evacuation
19 concerns for the Saquish/Gurnet area and the Duxbury Beach
20 south of Powder Point Bridge.

21 The Saquish/Gurnet area is only accessible from the
22 Duxbury Beach, but Saquish is jurisdictionally part of
23 Plymouth, and the Saquish Association is actively working with
24 Plymouth officials to complete their implementing procedure.

25 The town of Duxbury, particularly the Department of

1 Land and Natural Resources, has the necessary resources to
2 effect an evacuation of this area, and this department head
3 believes a peak population for this area is 4000, with 3000
4 being typical.

5 The head of the Duxbury Department of Land and
6 Natural Resources has stated that access is limited from the
7 Powder Point Bridge south to 500 vehicles, and is strictly
8 enforced.

9 Access to the Saguish/Gurnet area is limited to the
10 residents and summer population is less than 700. There are
11 very few year-round residents.

12 The area of the road between Saguish and Gurnet has
13 been identified as impassable due to periodic high tides for
14 perhaps two hours during consecutive high tides for two days
15 each month, and this is during a full moon.

16 During these high tides, the roadbed floods to a
17 depth of one to two feet for approximately a 100 yard length of
18 the road. This should not present a serious impediment to most
19 four-wheel drive vehicles, and in any event, the Staff and the
20 head of the Duxbury Department of Land and Natural Resources
21 believe that the area would be passable on foot, and people
22 could be picked up by vehicles on the Gurnet side, if
23 evacuation was necessary.

24 The Staff has returned to this area twice since the
25 October 14, 1988 meeting, and our conclusions are based upon

1 direct observation of the area and information provided by the
2 Duxbury head of the Department of Lands and Natural Resources.

3 Finally, the Staff is aware that the public
4 information brochure has not been issued since September 1986.
5 An interim brochure was issued in December 1987. The language
6 in the upcoming public information brochure has been approved
7 by the Commonwealth. The brochure is being finalized, and is
8 on schedule to be distributed in December 1988.

9 And just this week, a siren test was conducted for
10 the emergency planning zone on the afternoon of December 7,
11 1988. Of the 97 sirens, 95 operated properly.

12 To conclude, the Staff has continued to review the
13 progress toward resolution of the planning deficiencies
14 identified by FEMA in their self-initiated review. The
15 finalization of plans and procedures and ongoing training of
16 transportation providers for the protection of school children
17 and transportation-dependent population continues to indicate
18 that offsite response plans include measures to protect these
19 groups.

20 Based on Staff meetings with Civil Defense Directors
21 and the head of the Duxbury Department of Land and Natural
22 Resources, and on continuing Staff inspection activities, the
23 Staff concludes that the planning deficiencies identified by
24 FEMA are resolved in the emergency plans, and that progress has
25 continued since October 14, 1988 to improve the status of

1 emergency preparedness at the Pilgrim Station.

2 CHAIRMAN ZECH: All right, thank you very much.

3 MR. MURLEY: There are two regulatory matters pending
4 on Pilgrim. The first is October 15th, 1987, Governor Dukakis
5 and Attorney General Shannon filed a petition pursuant to
6 Section 2.206 of the Commission's regulations. The enforcement
7 action sought by the petitioners included maintaining Pilgrim's
8 shutdown pending the conduct of an adjudicatory hearing, and
9 the development and certification by the Governor of adequate
10 emergency plans.

11 Principal concerns raised by the petitioners included
12 the adequacy of the facility itself, management issues, and
13 emergency preparedness.

14 I have issued two interim responses to the
15 petitioners, on May 27th and October 6th, 1988. Petitioners'
16 request for NRC action has been denied, insofar as it relates
17 to the facility and to the management issues.

18 We are preparing a response to the petitioners
19 regarding emergency preparedness. Our assessment is
20 considering the current status and progress of emergency
21 preparedness.

22 Second regulatory matter is that the last full
23 participation exercise at Pilgrim was conducted on September
24 5th, 1985. Appendix E to 10 CFR Part 50 requires each licensee
25 to exercise with offsite authorities, such that the state and

1 local government emergency plans for each operating reactor
2 site are exercised biennially, with full partial participation
3 by state and local governments in the emergency planning zone.

4 In late 1987, Boston Edison Company requested a
5 schedular exemption for the biennial exercise which should have
6 been conducted in 1987. This request was based on a
7 determination that the ongoing efforts by the Commonwealth and
8 local governments to improve emergency preparedness in the
9 Pilgrim EPZ precluded their participation in an exercise in
10 1987. This exemption, which expired on June 30th, 1988, was
11 extended in response to the licensee's request by a second
12 exemption, until the end of 1988.

13 Boston Edison Company has, on December 8th, just
14 yesterday, submitted a request to the NRC for a further
15 extension of the schedular exemption to the requirements of 10
16 CFR 50, Appendix E.

17 In summary, then, our findings with regard to
18 emergency preparedness at Pilgrim are the following:

19 Based on the three previous successful exercises at
20 Pilgrim over the years, we believe the infrastructure to handle
21 emergency preparedness is still largely in place. Most of the
22 local individuals who would take part in emergency actions,
23 Civil Defense authorities, police authorities, school
24 authorities, have been working closely with Boston Edison
25 Company in developing the revised plans.

1 Therefore, we believe it is logical to conclude that
2 those individuals can and would implement the revised plans,
3 even though the plans may be in draft, and even though there
4 has not been a full scale exercise with the revised plans.

5 The six planning deficiencies identified by FEMA, the
6 NRC Staff has reviewed improvements in the plans, and observed
7 some demonstrations of these improvements, and we have
8 concluded that the planning deficiencies have been resolved.

9 Our reviews and observations indicate that the
10 current status of emergency planning at Pilgrim is in fact
11 superior to that which existed and was considered acceptable
12 during the earlier period when the plant was operating.

13 In reaching this judgment, we have considered the
14 emergency planning issues that were raised to us by emergency
15 planning officials in meetings with the NRC Staff, and some of
16 these issues have been repeated for the Commission here today.

17 Based on successful exercises at Yankee Rowe and
18 Vermont Yankee within the past year, we believe that the
19 Commonwealth of Massachusetts has demonstrated the capability
20 to manage an emergency at the state level.

21 Based on the findings above, then, we believe that
22 there is reasonable assurance, even considering the lack of a
23 recent exercise, that adequate protective actions can and will
24 be taken in the event of a radiological emergency at the
25 Pilgrim Plant.

1 Furthermore, we expect that the status of emergency
2 preparedness will continue to improve in the coming weeks and
3 months as Massachusetts and local officials continue to improve
4 the plans in preparation for a full scale exercise.

5 MR. STELLO: Mr. Chairman, along with the conclusion
6 that Dr. Murley has provided you with in regard to emergency
7 planning, I think the Staff would like to reiterate two other
8 conclusions that I think are very important, relating to the
9 original reason the plant was shut down.

10 First is that it is our view that the physical state
11 of the plant, especially in light of the significant safety
12 improvements that have been made over the past couple of years
13 -- these improvements, I might add, are improvements that
14 similar plants have not made. Pilgrim is clearly leading in
15 this regard. But that leads us to believe that this plant is
16 now safer than the plant was when it was licensed.

17 Two, the plant management team that is now on site,
18 in our view, is the best management team that we have seen up
19 at Pilgrim, and we think it has all of the ingredients to be a
20 very successful team to run that plant.

21 A couple more points that I think also ought to bear
22 before I finally give you our conclusion, and that's -- you've
23 already heard that there is a very controlled and carefully
24 thought out start-up program which would probably span four to
25 six months, depending on the kinds of problems that they may

1 run into as they start up the plant, and since this plant has
2 been down for some time, I expect that they will have such
3 problems to deal with as they start up.

4 Finally, the Staff intends to, as Bill has already
5 mentioned, augment very carefully the plant start-up. Our
6 oversight would be quite intense, including round-the-clock
7 coverage for all of the significant evolutions.

8 We would prepare reports at each of these hold points
9 that Bill mentioned, giving our view of the status of the
10 plant, how well they have done, and Bill would normally prepare
11 these reports before the Staff would authorize the licensee to
12 move up to the next power level. And if the Commission wished,
13 we could include at that point any report on the progress of
14 emergency planning consistent with those reports, and would
15 intend to provide those to the Commission.

16 The Staff, therefore, recommends to the Commission
17 that it authorize the Staff to go forward with this carefully
18 thought out start-up program. And that ends our presentation,
19 Mr. Chairman.

20 CHAIRMAN ZECH: Thank you very much.

21 Commissioner Carr?

22 COMMISSIONER CARR: No.

23 CHAIRMAN ZECH: Commissioner Rogers?

24 COMMISSIONER ROGERS: No.

25 CHAIRMAN ZECH: Commissioner Curtiss?

1 COMMISSIONER CURTISS: No.

2 CHAIRMAN ZECH: All right. Well, let me just say
3 thank you very much to the Staff. I would especially like to
4 thank each of those individuals that came from Massachusetts,
5 representing the local communities, and representing the State
6 of Massachusetts. They have come here today to present us with
7 their views and with the current information that they have
8 available regarding the status of emergency preparedness.
9 These views of these officials will be carefully considered by
10 the Commission, and the views of the Staff will be considered
11 along with those views, as we attempt to come to a decision
12 regarding the restart of the Pilgrim facility.

13 The Commission will not authorize restart of the
14 Pilgrim facility unless we are satisfied that the reactor can
15 be operated safely, and that the health and safety of the
16 citizens living in the vicinity of the plant will be adequately
17 protected. That is our responsibility, and that is what we
18 will be attempting to decide.

19 I believe the question really remaining before the
20 Commission with respect to the Pilgrim restart is whether or
21 not we have reasonable assurance that the emergency plans that
22 presently exist can be executed to protect the public in the
23 unlikely event of an accident with offsite consequences at
24 Pilgrim. This is what the Commission will be attempting to
25 decide.

1 As I stated earlier this afternoon, there will be no
2 vote taken today. I would ask my fellow Commissioners to
3 reflect carefully on what we have heard today, and with that, I
4 will ask my fellow Commissioners if they have any additional
5 comments to make before we conclude our meeting.

6 If not, thank you very much to all of you. We stand
7 adjourned.

8 [Whereupon, at 6:30 p.m., the proceedings were
9 adjourned.]

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

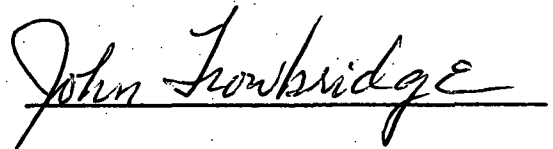
25

CERTIFICATE OF TRANSCRIBER

**This is to certify that the attached events
of a meeting of the U.S. Nuclear Regulatory Commission
entitled:**

TITLE OF MEETING: MEETING WITH PUBLIC OFFICIALS HAVING
RESPONSIBILITY FOR EMERGENCY PLANNING FOR PILGRIM NUCLEAR POWER
PLACE OF MEETING: Washington, D.C. PLANT
DATE OF MEETING: FRIDAY, DECEMBER 9, 1988

were transcribed by me. I further certify that said
transcription is accurate and complete, to the best
of my ability, and that the transcript is a true and
accurate record of the foregoing events.



Ann Riley & Associates, Ltd.

SCHEDULING NOTES

TITLE: MEETING WITH PUBLIC OFFICIALS HAVING RESPONSIBILITY FOR
EMERGENCY PLANNING FOR PILGRIM NUCLEAR POWER PLANT

SCHEDULED: 2:00 P.M., FRIDAY, DECEMBER 9, 1988 (OPEN)

DURATION: APPROX 2 HRS

PARTICIPANTS: PUBLIC OFFICIALS

- ALBA THOMPSON, CHAIRMAN 15 MINS
BOARD OF SELECTMEN, PLYMOUTH
- DOUGLAS HADFIELD, CIVIL DEFENSE DIRECTOR
- GEORGE CAMERON, SELECTMAN
- PATRICIA DOWD, CHAIRMAN 10 MINS
BOARD OF SELECTMEN, DUXBURY
- CARL O'NEIL, CIVIL DEFENSE DIRECTOR
- HELEN M. COPELLO 10 MINS
ADMINISTRATIVE ASSISTANT/
DEPUTY DIRECTOR OF CIVIL DEFENSE, CARVER
- ROBERT T. REED 10 MINS
TOWN ADMINISTRATOR, KINGSTON
- DANIEL McDONALD, VICE CHAIRMAN 10 MINS
BOARD OF SELECTMEN, MARSHFIELD
- DANIEL MCGONAGLE, CIVIL DEFENSE DIRECTOR
- TOM BARLOW, CLERK 10 MINS
BOARD OF SELECTMEN, BOURNE
- CHARLES NOYES, CIVIL DEFENSE DIRECTOR
- ANN WAITKUS-ARNOLD, CHAIRWOMAN 10 MINS
DISABLED PERSON'S ADVISORY GROUP ON
NUCLEAR EVACUATION
MASSACHUSETTS OFFICE OF HANDICAPPED AFFAIRS
- PETER AGNES, ASSISTANT SECRETARY 10 MINS
OFFICE OF PUBLIC SAFETY
COMMONWEALTH OF MASSACHUSETTS
- ROBERT J. BOULAY, DIRECTOR
MASSACHUSETTS CIVIL DEFENSE AGENCY
- JOHN L. LOVERING, DEPUTY DIRECTOR
MASSACHUSETTS CIVIL DEFENSE AGENCY
- BUZZ HAUSNER, DIRECTOR
NUCLEAR SAFETY EMERGENCY PREPAREDNESS PROGRAM
- DAVID QUAID

NRC 20 MINS

- VICTOR STELLO
- TOM MURLEY
- WILLIAM RUSSELL
- RONALD BELLAMY

TESTIMONY
ALBA C. THOMPSON, CHAIRMAN
PLYMOUTH BOARD OF SELECTMEN

NUCLEAR REGULATORY COMMISSION
ROCKVILLE, MARYLAND
DECEMBER 9, 1988

I am Alba Thompson, Chairman of the Plymouth Board of Selectmen.

Also attending this hearing is Selectman George Cameron, Civil Defense Director Douglas Hadfield, and Marie Fehlow representing the Nuclear Matters Advisory Committee.

The Town of Plymouth welcomes this opportunity to speak directly to the Commissioners in a scheduled meeting. I have been told it is the first time in the history of the NRC that local officials have had such an invitation. If that is true, I applaud your decision that permits the voice of the people to be heard, and as the spokesman for historic Plymouth, I thank you. It is our feeling that this hearing should have happened a long time ago and that it should have happened in the emergency planning area itself where the people most affected live. Our New England traditions of government made that a reasonable expectation.

It is the responsibility of the Plymouth Board of Selectmen to develop, implement, and approve emergency planning whether it be for natural disasters such as storms or radiological response (RERP) to an accident at the Pilgrim Nuclear Power Station (PNPS). Emergency planning is a part of our public safety responsibilities that we take an oath to uphold. These are serious commitments to protect the life and property of our citizens.

The Plymouth Board of Selectmen is composed of five persons elected to the highest executive body of the town. It has a wealth of personal experience to bring to bear in the area of civil defense. Three of us are veterans of active military service. George Butters is a retired officer of fire fighters. David Malaguti is in the construction trades. Bruce Arons is a businessman. George Cameron is a fire and arson specialist. Alba Thompson has had experience in civil defense and large evacuations.

Ours is a hardworking Board, well equipped for a rational approach to emergency planning. In addition, it now has a full-time, trained Civil Defense Director, Mr. Douglas Hadfield, who served the town for eight years as a volunteer and was hired in January 1988 as a full-time Civil Defense Director.

The 1985 radiological emergency plan for the Town was about a one-half inch thick 11x8 notebook. Our present draft plans and procedures now fill seven 2 1/2 inch binders and there is more that must still come.

Yes, we have made and are making genuine progress in our effort to plan for radiological emergency. For us that is a prioritized, continuing task, especially in the face of repeated statements from NRC staff that re-start of the Pilgrim Nuclear Power Station is imminent.

I cannot express too strongly that while Plymouth has come a long way in the planning process, we have still a long way to go. We have a heavy sense that we are not prepared at this time to respond effectively to a radiological accident of major proportions. Ours is not just a matter of facing multiple regulations; ours is a moral responsibility to be prepared to assist our citizens - all of them under conditions of tension and fear.

I would now bring your attention to the map our Civil Defense Director has pinned up. There are several factors that make planning in Plymouth a complex and difficult process. In terms of area, we are the largest town in Massachusetts, 103 square miles. We have a coastline on Massachusetts Bay which is 17 miles long. That means we have no hope of egress (by sea) for almost 180 degrees. Our year-round population is 45,000 and growing. We have grown by 200% since the Pilgrim Nuclear Power Station opened in 1972, and we are the fastest developing community in southeastern Massachusetts. In the warmer seasons of spring, summer, and fall, an additional 20,000 residents join us. And because Plymouth is one of the nation's historical treasures, we receive over one million transient visitors every year.

Because of the great geographical spread of 103 square miles, we find five distinct groupings of population in what our comprehensive plan calls "village centers." Incidentally, our center of population is in south Plymouth which is close to Pilgrim Nuclear Power Station. South Plymouth is our fastest growing residential district exacerbating the updating of the planning process. At the moment South Plymouth is served by one small fire station. The police station, the Town Hall, and the Civil Defense headquarters are 12 road miles away.

The Manomet section of Plymouth surrounds the Pilgrim Nuclear Power Station and is also growing fast with numerous subdivisions and several popular beaches. The road network around Plymouth is deficient for our normal needs since Route 3A is the country's oldest road, winding its way through the business centers of a string of towns leading to Boston. The expressway, Route 3, which parallels 3A to the west, is the main Boston to Cape Cod highway. Route 44 is the main

east/west route out of Plymouth to Providence and New York. It is a meandering, over-loaded antique with dangerous intersections at Route 3, which are currently the worst traffic accident scenes in the entire town.

All three major evacuations routes are but two-lane and suffer grid-lock during normal rush hours, during the summer visitor influx, and during our New England storms. Our police and fire chiefs have serious concerns about response time given the conditions of our roads under normal conditions, let alone under disaster conditions.

Our eleven schools are scattered throughout our large area to serve the various centers of population. We have one of the largest school age populations in our state. We have over 8,000 students and an educational staff of over 1,000. The task of evacuation is tremendous, especially when one considers that six schools are within five miles of the Pilgrim Nuclear Power Station and the Manomet Elementary school is only 2.3 miles from the plant.

The entire EPZ has one major hospital. It is the Jordan Hospital of Plymouth which is 3 1/2 miles from the Pilgrim Nuclear Power Station. It has only one decontamination room dedicated first to serving workers of the Pilgrim Nuclear Power Station and only secondarily the general citizenry of Plymouth. The administration of the hospital has not yet been able to pass approved first draft plans to our Civil Defense Director.

To give you some idea of the scope of our plans, we must consider 9 summer camps, 16 pre-school day care centers, 8 nursing homes, 6 elderly congregate housing projects, the large Plymouth County Jail and House of Correction, a Massachusetts correctional institution, and a vast state park of 15,000 acres and 12 lakes whose daily camping and recreational visitors reach many thousands at various times. I hope you have some idea of the complexity of our preparations for radiological response.

But I am sure you want most to know the present status of our emergency plans. To encapsule in one statement - we have come a long way and we have a long way to go.

We are proceeding with all speed commensurate with effective planning. Our channel of progression begins with the work of our Civil Defense Director Hadfield with each town department or private agency. Once the department has a draft plan it believes it can operate, the department head signs off. The draft then moves to the Radiological Emergency Response Planning Committee for review. That committee includes a Selectman as chairman, the Civil Defense Director, the Police and Fire Chiefs, representatives of the Department of Public Works, School Department, Public Health, as well as three

at-large citizens. The Committee reviews all plans and, when satisfied, passes the draft to the Board of Selectmen which studies and moves toward approval. Obviously, anywhere along that line of evaluation, the draft could be returned for additions and changes.

That aforementioned channel is a good vehicle for arriving at prudent decisions. However, there still remains a never-ending task for periodic up-dating, as is the case in all strategic planning.

At the moment, Plymouth has incomplete, untested, draft plans. The task of public education has barely begun.

The slim general draft has had only a technical review by the Federal Emergency Management Agency (FEMA). The review was almost a useless "generic" matching against NUREG 0645. All five EPZ towns received exactly the same "generic" report, hardly reassuring since our circumstances for planning vary considerably.

We are in the process of writing implementing procedures (IP's) which, of course, are the specifics of responsibility and necessary actions for each department. We require 90 IP's. The selectmen have approved 34 in concept. None of the IP's have been forwarded to the State Civil Defense Agency.

Key portions of the implementing procedures are still being developed. Police, Fire, Schools, Hospital, Handicapped Populations, and Saquish (a beach peninsula) are in various draft states. These absolutely essential aspects of our emergency plans are incomplete or in a preliminary form. To summarize, we are working assiduously, but our radiological planning is far from being complete and therefore is not approved at the local level, has had no higher review, and is untested. Anyone who believes our town is ready for re-start of Pilgrim Nuclear Power Station has not really examined our ability to respond to nuclear emergency. The unanimous position of the Board of Selectmen is:

The Pilgrim Nuclear Power Station ought not be permitted to restart until there are effective, radiological emergency response plans in place which have been approved and tested.

The Board took this position based on sound reasoning:

- a. The Pilgrim Nuclear Power Station has had years of troubled history reflected by numerous NRC fines, poor SALP evaluations, and management and maintenance problems.
- b. Radiological control continues to earn only a 3, the lowest numerical category of a SALP report.

c. The mounting levels of radioactive spent fuel rods and other highly contaminated debris in the on-site pool is a community concern.

d. In the 2 1/2 years the Pilgrim Nuclear Power Station has been off-line, there have been a large number of recent, key appointments of personnel without any operational experience at the Pilgrim Nuclear Power Station.

e. Plymouth has had a full-time Civil Defense Director for one year only, his appointment having been made in January 1988. A year of concentrated effort has not been long enough to produce all the town needs in radiological planning, preparation of an emergency operations center, and marshalling of volunteers, to mention only some responsibilities.

f. No present drafts of plans or operating procedures have ever been approved by FEMA.

g. No present drafts have ever been tested.

h. Basic training is incomplete in most departments and has not even begun in others.

i. There are continuing problems of communication between Boston Edison and the Town of Plymouth.

I am hopeful that this brief outline rooted firmly in the collective wisdom of our staff has given you insights into our preparedness. We have not dragged our feet. We have not permitted the size of the problem to defeat us. Neither have we indulged in irrational and illogical fears. But we do maintain that the Commission has not had an accurate picture of our situation until today. That, we believe, is a result of an administrative process that never dealt equitably with the people who knew best and had the planning responsibility. I recall with some bitterness and frustration one public meeting that gave Boston Edison 4 hours of testimony time and gave the Town of Plymouth two minutes, and that came in the late afternoon just prior to adjournment. But that has been the usual tenor - long days of technical review with perfunctory attention to the public and little attention to emergency planning.

There has never been, to our knowledge, an NRC meeting in Plymouth which was devoted to emergency planning, yet thousands of hours went into technical reviews of Pilgrim Nuclear Power Station and several public meetings were held by technical NRC staff. That is a sad ratio of concern.

The only NRC hearing on emergency planning was held here in Rockville on October 14, 1988. To the consternation of Plymouth, we were not even invited to testify. Our Civil Defense Director, who nevertheless journeyed to that meeting, was not permitted to speak. Yet Boston Edison had been invited to give its "current understanding" of the status of radiological emergency planning in the EPZ towns. What did you expect -an objective and dispassionate view from a utility that was petitioning to go back on line after a 2 1/2 year hiatus and an expenditure of many millions of dollars? Why was Boston Edison supposed to be a better source of information than we who have the responsibility for developing and operating the emergency plans? Credibility is indeed stretched by such a process.

As you know, the Town of Plymouth challenged the accuracy of much of the factual testimony presented at the October 14 NRC meeting, particularly pages 76 to 103 in the transcript. Perhaps even more importantly we question the underlying assumptions and conclusions. They deny the reality as we know it.

After the October 14, 1988 two NRC staffers (Lazarus and Hogan) visited the Plymouth Emergency Operations Center (EOC) in the Plymouth Memorial Building. In the past three years they have been the only NRC staffers in the planning area who ever visited our EOC or ever consulted with us. Even those two staffers did not have time to thumb through any of our draft plans. Not a volume from our three foot shelf was opened. We find those circumstances extraordinary in the face of our vulnerability during radiological disaster.

In these 15 minutes, I have tried to bring to you the truth of what exists in Plymouth. I have not, because of limits of time, been able to give you much beyond the general picture. I have not even been able to deal with the threat of radiological accident to land and property, currently assessed at two billion dollars in Plymouth alone.

I sincerely hope, however, I have conveyed to you the unanimous position of the Plymouth Board of Selectmen "The Pilgrim Nuclear Power Station ought not be permitted to restart until there are effective, radiological emergency response plans in place which have been approved and tested."

Ours is a solemn responsibility to protect and uphold the public safety. We are not prepared or ready to do that in the event of serious emergency at the Pilgrim Nuclear Power Station.

Essentially emergency planning decides who will deal with the disaster and how they will operate. It also, by its time frame, may decide who will live and who will die. These are not merely pieces of paper developed according to regulations. They are a blueprints for survival.

At this critical moment in the history of a troubled Pilgrim, all the other 45,000 pilgrims, the citizens of our precious historic town, are not protected by completed, or approved, or tested emergency plans.

Let the record show clearly that those of us, sworn to uphold the public safety of the Town of Plymouth, have so advised the Nuclear Regulatory Commissioners.

If, in the face of our arguments, you decide to re-start the Pilgrim Nuclear Power Station before we are ready to protect our own citizens, then you must understand that you have over-ridden the judgement of the traditional local authority in the public safety area.

If that happens, it will be you who will be held accountable. Yours is an awesome responsibility.

SYNOPSIS

TESTIMONY OF ALBA C. THOMPSON, CHAIRMAN

PLYMOUTH BOARD OF SELECTMEN

NUCLEAR REGULATORY COMMISSION, ROCKVILLE, MARYLAND

DECEMBER 9, 1988

1. Preliminary remarks

2. Difficulties of emergency planning in Plymouth

- a. Geography: 103 square miles, 17 miles of coastline; largest town in area in Massachusetts
- b. Demography: 45,000 population year-round; 20,000 additional summer residents; one million transient visitors per year; 5 "village" centers
- c. Road Network: main evacuation routes 3A, 3, 44 subject to grid-lock under normal conditions; all are two lane roads
- d. One hospital in the entire EPZ: Jordan Hospital in Plymouth is 3 1/2 miles from Pilgrim Nuclear Power Station
- e. Schools: School age population of 8,000 and staff of 1,000 in eleven scattered schools
- f. Full time Civil Defense Director has only been at work since January 1988
- g. 9 summer camps, 16 preschool daycare centers; 8 nursing homes; 6 elderly congregate housing units; 1 Plymouth County jail; 1 Massachusetts Correctional Institute; 1 Massachusetts state park
- h. Entire community is in the emergency planning zone

3. Present status of Radiological Emergency Plans

- a. All in draft, untested form
- b. Progression: Department Heads - RERP Committee - Selectmen - State Civil Defense - FEMA
- c. General draft plan has had only technical FEMA review

Testimony of Alba C. Thompson, Rockville, Maryland 12/9/88

- d. Implementing procedures: 90 needed; 34 approved locally in concept only; 0 have been forwarded to the State Civil Defense
- e. Key portions of master draft plan still in development stages: police, fire, schools, hospital, handicapped population

4. Position of Board of Selectmen for past two years

- a. The Pilgrim Nuclear Power Station ought not be permitted to restart until there are effective, radiological emergency response plans in place which have been approved and tested.
- b. Reasons for official position
 - (1) Years of troubled history of Plymouth Nuclear Power Station (fines, SALP findings, management and maintenance problems, communications)
 - (2) Continuing poor SALP evaluation in some areas
 - (3) Continuing poor communications between Boston Edison/Town of Plymouth
 - (4) Large number of recent key appointments at Boston Edison Company of personnel without any operating experience at Pilgrim Nuclear Power Station
 - (5) Plymouth has only had a full time Civil Defense Director less than one year
 - (6) No present drafts of plans or operating procedures have ever been approved by FEMA
 - (7) No present drafts have ever been tested
 - (8) Basic training is incomplete in most departments and has not even begun in others

5. Closing Remarks

OUTLINE

STATEMENT OF PATRICIA A. DOWD DUXBURY BOARD OF SELECTMEN

NUCLEAR REGULATORY COMMISSION, ROCKVILLE, MARYLAND
DECEMBER 9, 1988

1. Opening Remarks

2. Emergency Response Planning Process:

A. Recognition of deficiencies in plan which led to withdrawal of approval by FEMA and the Town of Duxbury.

B. Establishment of the Radiological Emergency Response Plan Study Committee (RERP) and regular Civil Defense and Department Managers meetings.

C. There is a four-phase process in the development and approval of Implementing Procedures (IPs): draft, revised draft (includes School Committee review), review by the RERP Study Committee, review and approval by the Board of Selectmen.

D. Present status of Duxbury's Plan:

1. The draft plan (general plan excluding Implementing Procedures) was forwarded to FEMA for technical review only.

2. Implementing Procedures (IPs) are in draft form only. They have not been approved by Department Managers; school procedures do not have School Committee approval; IPs have not been reviewed by the RERP Study Committee.

3. The Board of Selectmen has not reviewed or approved the IPs.

4. The IPs, contrary to testimony given at the NRC hearing on Oct. 14, 1988, have not been forwarded to the Commonwealth or to FEMA.

5. Introductory training has begun on radiation, dosimetry and decontamination. Completion is estimated at 1/2 of 1% by our Civil Defense Director.

6. Duxbury's Plan is lacking its most critical component: a designated reception center.

3. Unique characteristics of Duxbury which present obstacles in Emergency Planning.

A. Road network: there is limited access to Rtes. 3, 3A and 14. Local streets are rural and not designed to accommodate traffic of evacuation capacity.

B. Duxbury Beach is a seven-mile barrier beach from which exiting traffic is limited to Gurnet Rd. and the Powder Point Bridge. This beach hosts residents, tourists and daily visitors. Problems associated with this area have not been resolved.

C. The school population consists of 3100 students of which three-fourths are concentrated in a "campus complex" four miles from the Rte.14/Rte.3 interchange. Busing capability available through the Town of Duxbury permits relocation of only one-third of the school population at any one time. Additionally, there are three pre-school/day care facilities of significant size and numerous smaller programs at scattered locations.

D. The year-round population is approximately 14,000 with an adult workforce that is predominantly commuter. Planning response for a dispersed rather than concentrated workforce calls for management strategies not yet assembled and reviewed.

E. Municipal resources are limited. The Town of Duxbury has devoted maximum possible staff and volunteer service hours to Emergency Response Plan development.

4. Identified Needs by the Town to Complete Planning Process

A. Information is often erroneous or incomplete and frequently the requested information is not available:

1. Supplemental bus service: identification of transportation providers, number of buses available, driver commitments, allocation of bus resources for "contaminated" area.

2. Identification of a viable and acceptable reception center.

3. Identification of special needs population as well as personnel resources to supplement municipal staffing,

B. Resources:

1. Documented guarantees of additional emergency manpower from State Police, Coast Guard, National Guard, other support agencies.
2. Completed training modules in all procedures for all applicable municipal officials and employees.
3. Suitable training, demonstrations and tests of all EOC equipment, including not only the communication system but TDD provisions for the hearing-impaired.
4. Auxiliary power for town buildings used as shelters and for the EOC.

C. Time:

1. To complete procedures developed with our four-phase process.
2. To complete training programs that are the only guarantee of making implementation of written plans an approximal goal.
3. To demonstrate the effectiveness of plans and procedures through a program of field testing exercises.
4. To permit municipal managers to carry out ERP responsibilities without doing so at the expense of other public safety functions.
5. To witness consistent evidence of plant management improvements, safety provisions and good faith efforts on the part of BECO that are long overdue to the communities in the Emergency Response Zone.

5. Official Position of the Duxbury Board of Selectmen:

The Duxbury Board of Selectmen are officially opposed to the restart of the Pilgrim Nuclear Power Station until radiological emergency response plans, including procedures, training and resources, are approved and tested.

6. Closing Remarks

PATRICIA A. DOWD, CHAIRMAN

DUXBURY BOARD OF SELECTMEN

Statement on the Status of Emergency Planning
for the Pilgrim Nuclear Power Plant

December 9, 1988

I appreciate the opportunity to speak today on behalf of my colleagues on the Board of Selectmen and the residents of Duxbury. This is the first time any member of my board or for that matter, any public official from Duxbury has been invited to provide information on the status of Emergency Planning in our town. In the testimony given on October 14th, there was clearly an implication that NRC staffers enjoyed a close working relationship with local Selectmen and appointed planning officials. Unfortunately, that has not been the case with the Town of Duxbury. Dr. Bellamy did visit our EOC after the September hearing in Plymouth in order to assess the radiation protection factor in the building. We are still waiting for a written opinion on that issue. In addition, two NRC staffers met with our Civil Defense Director on October 26th, 12 days after your hearing, in order to discuss the status of our planning efforts. I assume this is what is referred to as a fair amount of interface with local officials.

Considerable progress has been made in up-grading our plans and procedures. However, we are continually frustrated when that progress is repeatedly misrepresented as an

indication that those plans and procedures could be implemented in the case of an accident. Gentlemen, draft plans and draft procedures, which are not reviewed, revised and approved cannot be implemented.

As Selectmen we not only recognize that Emergency Planning is our responsibility, one we share with the Commonwealth of Massachusetts, but we take this responsibility seriously. If, after presenting an accurate analysis of our planning status and restating our position that the Pilgrim Nuclear Power Station should not restart until plans and procedures are approved and tested, you decide in favor of restart, the responsibility will be yours in the event of an accident.

Emergency Response Planning Process in Duxbury:

As our confidence in Boston Edison diminished and the risks of the Plant became evident, Duxbury took a good look at the Emergency Response Plan and recognized that it could never be implemented in its current form. We withdrew our approval as did FEMA in 1987. Duxbury appointed the Radiological Emergency Response Plan Study Committee to work with Department Managers to develop a viable, workable Plan. In the past two years, these officials and volunteers have expended an exorbitant amount of time to accomplish that task.

Duxbury's Draft Plan, excluding Implementing Procedures , was forwarded to the Commonwealth and subsequently to FEMA for technical review only.

There is a four-stage process in the development and approval of Implementing Procedures (IPs):

1. Drafts are received from Boston Edison and revised by the appropriate Manager.

2. The revised drafts are reviewed by all the Managers and revised as many times as necessary. At this stage, the school procedures are also reviewed, revised and ultimately approved by the School Committee.

3. IPs are reviewed by the RERP Study Committee. At this stage information on supplemental resources needs to be available. Recommendations are made to the Selectmen.

4. The Board of Selectmen review all segments of the plan and either approve or request additional revisions.

There are 38 IPs for Duxbury. Of these, 35 have been developed and are currently in the second stage of the process. Four of the 35 have undergone review but still have unanswered questions. The school procedures are under review but have not yet been presented to the School Committee. The RERP Study Committee has not completed their review of any of the procedures and in fact, has not received most of them. None of the IPs have been submitted to the Board of Selectmen for review and approval.

This progression takes a considerable amount of time but it is the core of the plan and must be accomplished in order to achieve our goal of developing a viable plan. Although none of the procedures have moved through all 4 phases, this process is approximately 15-20% complete in total.

The Implementing Procedures, contrary to the testimony given on October 14th by Dr. Bellamy, have not been forwarded to the Commonwealth or to FEMA.

Introductory training has begun in the areas of radiation, dosimetry and decontamination only. Training cannot begin on those IPs unique to Duxbury until the IPs are revised. Completion is estimated at 1/2 of 1% by our Civil Defense Director.

Duxbury does not have a designated, approved reception center. If we were forced to implement a plan at this time, we would be implementing a plan absent its most critical component: a destination point for the evacuating public. The center currently under consideration by the State is not equiped at this time and is unacceptable to Duxbury.

Unique Characteristics of Duxbury which present obstacles in Emergency Planning:

Duxbury has approximately 150 miles of public roads. Outside of limited access Rte.3 and State Rtes.14 & 3A, local streets are rural-narrow, curved-and are not designed to accommodate traffic generation of anywhere near evacuation capacity.

Duxbury Beach (inclusive of Gurnet and Saquish) is a seven mile barrier spit from which exiting traffic is limited to Gurnet Rd. and the Powder Point Bridge. No viable, manageable system of moving an estimated 9,000 persons from this facility exists. Procedures uniquely suited to this resource and its limited access are central to a credible emergency response plan. Development of these procedures is incomplete if not in its infancy at this time.

Thirty-three percent of the population of Duxbury

consists of 0-18-year-olds, with approximately 3100 students enrolled in the public schools. Busing capability available through the Town of Duxbury permits relocation of only one-third of the school population at any one time. Contrary to testimony given on October 14th, it is currently impossible to transport all students in a single trip. The availability of information on supplemental bus resources is, at best, sketchy. We have been able to identify only one carrier for Duxbury for 12 buses and the carrier is stationed in the Worcester area, 70 miles away.

Additionally, there are three pre-school/day care facilities of significant size and numerous smaller programs at scattered-site locations. Procedures adequate to ensure the safe transit of this under-18 population sector are not finalized.

The year round population is approximately 14,000 in a community characterized as "bedroom"--that is, with an adult workforce that is predominantly commuter. An estimated 65% of the Town's workforce commutes daily to urban employment centers within one to two hours of Duxbury. Adequacy of plans to manage relocation of a dispersed workforce during peak-period commute times, or conditions akin to peak-period that would arise from workers attempting to unite and move families during an event, is unknown at this time. Planning response of a dispersed rather than concentrated workforce calls for different transportation management strategies not yet assembled and reviewed.

Municipal resources are limited. The Town of Duxbury has devoted maximum possible staff and volunteer service hours to Emergency Response Plan development. The Fire Chief serves as Civil Defense Director, and all public safety personnel carry ERP responsibilities as ancillary to their daily workloads. BECO has provided emergency operations center and equipment, but training in equipment use (i.e. telephone communications system) is inadequate to make the facility functional. Town department heads meet weekly with Edison planners to devote time to ERP development; to suggest that a plan is complete or procedures are at an implementation stage is woefully premature.

Identified Needs by the Town to Complete the Planning Process"

Information made available is often erroneous or incomplete and frequently the requested information is not available at all. Information needs are:

- Supplemental bus service for transport of school and/or special needs populations: identify transportation service providers, number of buses to be available, assurances of driver commitments, allocation of total bus resources for "contaminated" areas.
- Identification of a viable and acceptable reception center.
- Identification of special needs population as well as resources to supplement municipal staffing.

Resources needed to even consider implementation of a plan for Duxbury are:

- Documented guarantees of additional emergency manpower from State Police, Coast Guard, National Guard, other support agencies.

- Completed training modules in all procedures for all applicable municipal officials and employees.

- Suitable training, demonstrations and tests of all EOC equipment and other components of the evacuation process, including not only the communications system but TDD provisions for the hearing-impaired.

- Auxiliary power for town buildings used as shelters and for the EOC.

I am here today to ask for time, time :

- To complete procedures development in accordance with our four-phase process,

- To complete training programs that are the only guarantee of making implementation of written plan an approximal goal,

- To demonstrate the effectiveness of plans and procedures through a program of field testing exercises. We do not believe that testing in another region is sufficient and there has not been demonstrations of bus and ambulance drivers for Duxbury.

- To permit municipal managers to carry out ERP responsibilities without doing so at the expense of other public safety functions,

- To witness consistent evidence of plant management improvements, safety provisions and good-faith efforts on the

part of BECO that are long overdue to the communities in the Emergency Response Zone. The water spill incident a couple of weeks back certainly did not strengthen our confidence in Edison when I received phone calls from residents before the Civil Defense Director was notified that a newsworthy event had taken place.

Official Position of the Board of Selectmen:

The Duxbury Board of Selectmen are officially opposed to the restart of the Pilgrim Nuclear Power Station until radiological emergency response plans, including procedures, training and resources, are approved and tested.

Regardless of your decision on restart, Duxbury officials and volunteers will continue to work with Boston Edison to reach our goal of producing a plan which will provide for the health and safety of our residents. As a matter of fact, we have recently accelerated our efforts. I am here today to ask that you give us sufficient time to protect those whose lives will be most affected if Pilgrim is allowed to restart. *AT THIS TIME.*



Board of Selectmen

Carver Massachusetts

02330

Telephone 888-2561

December 2, 1988

Mr. Lando W. Zech, Jr.
Chairman
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Zech:

Thank you for the invitation to participate in the Commission meeting regarding the Pilgrim Nuclear Power Station. The following is a brief summary of the status of the Radiological Emergency Response Program (RERP) for the Town of Carver.

Emergency Response Plans (RERP) and Implementing Procedures (IPs):

The Carver RERP was submitted to MCDA and FEMA for an initial informal technical review in January of this year. MCDA and FEMA subsequently provided comments that have been incorporated into the plan. Implementing procedures (IP's) were developed with input provided by various town agencies and private facilities such as nursing homes, daycare centers and camps. In all 42 IP's were developed and reviewed by town agencies and private facilities.

A Shelter Implementation Program has been developed with various buildings both public and private having been identified and agreed to as shelters with tone alert radios and shelter kits in place.

Conceptual approval of plans and procedures has been given by the various agencies in the town in order for the plans, procedures and shelter program to be submitted to MCDA and FEMA for an informal technical review.

Sixteen copies of the Carver RERP, Implementing Procedures and Sheltering Implementation Program along with supporting documents were submitted to MCDA for FEMA on October 12, 1988.

Mr. Lando W. Zech, Jr., Chairman
U. S. Nuclear Regulatory Commission

Page 2
December 2, 1988

Final approval of the RERP and Implementing Procedures by the town of Carver will not be accomplished until an exercise has been conducted.

Facilities and Equipment:

The Emergency Operations Center is essentially complete. Some equipment is still on order.

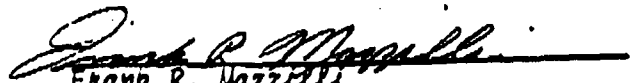
Training:

Approximately 83 percent of emergency response personnel in the town of Carver have received some form of training. We expect to have all personnel completely trained in the first quarter of next year.

Summary:

Our response capability has greatly improved over the last 18 months. Although a few items are outstanding, we have drafted new plans and procedures, begun training and are anxious to test our capabilities in live (announced and unannounced) drills and a full-scale exercise.

Sincerely,


Frank R. Mazzelli
Chairman - Board of Selectmen &
Civil Defense Director



TELEPHONE (617) 585-4445

TOWN OF KINGSTON, MASSACHUSETTS

Office of

THE SELECTMEN

TOWN HOUSE
23 GREEN STREET
KINGSTON, MA 02364

TESTIMONY OF ROBERT T. REED

Town Administrator, Kingston, Massachusetts

NUCLEAR REGULATORY COMMISSION, ROCKVILLE, MARYLAND

December 9, 1988

Good afternoon:

My name is Robert Reed and I am the Town Administrator of Kingston, Massachusetts. I am here to offer brief remarks on behalf of the Selectmen, Civil Defense officials and citizens of the Town of Kingston.

Kingston is the town immediately to the north of Plymouth, the town in which Pilgrim Nuclear Power Station is located.

Kingston has a population of approximately 8,000 and, for purposes of planning, is included in its entirety within the Pilgrim ten-mile Emergency Planning Zone.

Because of the plant's performance record in the past, and the proximity of Kingston to the site, the restart of Pilgrim Nuclear Station is a matter of great concern to the people of Kingston.

Last November 8, a majority of the citizens of Kingston who voted supported a statewide referendum question which called for no further generation of electric power by commercial nuclear plants in the Commonwealth by means which result in the production of nuclear waste.

At a special Town Meeting in May of 1987, the town voted to request the Governor and Attorney General of Massachusetts to take whatever legal action appropriate to delay the restart of Pilgrim Nuclear Station until the Massachusetts Department of Public Health completed a study of the cancer incidence in the towns of Plymouth, Kingston, Duxbury, Marshfield and Scituate.

Finally, the Kingston Board of Selectmen recorded their official position on restart: they are opposed to the restart of Pilgrim Station until an approved and tested Radiological Emergency Response Plan is in place.

History

In July of 1987, the planning process was begun on the Kingston Radiological Emergency Response Plan and since that process was initiated, the plan itself and implementing procedures for it are considerably better than they used to be. Town officials have put in countless hours of planning, training and procedure development. Agency heads, private shelter owners, school officials and volunteers all dedicated a great deal of effort toward completing a draft version of the response plan,

detailed implementing procedures, consisting of 70-75 checklists, and a shelter implementation program. All of these documents were submitted to the State Civil Defense Agency and the Federal Emergency Management Agency for technical review on October 12, 1988. We are awaiting feedback from those agencies as to the appropriateness of format and content of the documents. However, it must be noted that these plans and procedures have been approved by the town "in concept" only, and there remain some planning, procedure and resources problems which must be addressed before formal approval can be considered.

Implementing Procedures

For instance, it is the policy of the Kingston Elementary School Committee to dismiss students early when there is a snow emergency. The committee wishes to follow the same procedure in a radiological emergency, but the policy is at odds with the draft implementing procedure for schools, which instead calls for bringing in buses and conducting a "precautionary transfer" of schoolchildren to host schools outside the area. The school committee's wishes also are at odds with the recommendations of State and utility planners. Discussions to resolve this issue are underway, but no agreement has yet been reached. In addition, the implementing procedure for Kingston's regional high school is still under review by that school committee, which includes representatives from three non-Emergency Planning Zone towns. The school itself contains students from

outside the Emergency Planning Zone, and specific provisions for the parents of those children have not yet been outlined. There is also a concern for the special needs population of Kingston and what special measures would be taken for their safety. As yet, identification of the special needs population is incomplete.

Traffic Management

The Kingston Police Chief objects to some premises set forth in the traffic management procedures. He feels strongly that no one should be permitted to enter the town once an evacuation is ordered. His objections conflict with the current Evacuation Time Estimate, which states that the borders of the town are not to be controlled for two hours so that residents may get in and out to adjust for their own evacuation needs. The police chief feels this strips him of maximum control of the town, and is another example of a procedure in need of attention.

Recently, work has begun on the construction of a large shopping mall in southeast Kingston expected to be completed in 1989. The company developing the mall has proposed and is initiating work on the upgrading of five different traffic intersections to handle the anticipated increase in traffic near the site of the mall. An item like this one raises some concern about our radiological emergency response plan: if construction needs to be done along our roads and intersections reconfigured in order to service an influx of drivers out on a

shopping spree, how can we assume the current roads are sufficient and safe enough to handle the volume and type of traffic expected during a nuclear evacuation? The mall is not the only large project proposed for Kingston, already a rapidly growing area, and traffic congestion is anticipated to increase each year.

Personnel

A resource concern closely aligned with traffic management is that additional coordination is required among the Kingston Police Department, the State Police and the County Sheriff's office: there is a question as to whether the town police force can manage to staff all the traffic and access control points assigned to them. Our police chief says there is not enough cruisers to man all the traffic and access control points. School officials are concerned whether a sufficient number of bus drivers will respond to evacuate the school children.

Recruitment is still needed in order to staff all the civil defense positions at least two deep to ensure 24-hour coverage. We are still in need of an alternate Civil Defense Director to take over when the designated director has done a 12-hour shift.

Equipment and Facilities

The planning process has also uncovered some equipment needs, such as a functional Emergency Operations Center, traffic and access control equipment, and communications equipment. This equipment is vitally needed in order for the town to protect its citizens. Although the utility has provided a great deal of this equipment, it is not all in place. Other equipment issues still unresolved include the fact that only two telephone lines exist into the Kingston Elementary School, the regional high school or the school administration building. The telephone system at our Emergency Operations Center is not fully operable at this point, either. We need pagers for all our key people if we want to feel confident that we can notify them at any time. We still need public address systems for police and fire vehicles, traffic control barricades and cones, decontamination kits. In addition, it is believed that the number of shelters for transients is insufficient.

All these equipment and facilities needs illustrate the overwhelming expectations placed on a municipality's limited resources.

Training

Perhaps the single most important element in the emergency response plan is training, and in many departments the training remains incomplete or has not yet begun. The police, fire and highway departments are not yet fully trained. No training

sessions have been held for the 100-plus teachers and staff at the regional high school; a training session was held at the elementary school, but there was very light attendance. Our Civil Defense Director is not comfortable that a staff yet exists which is sufficiently trained to coordinate the Emergency Operations Center. There are dozens of nursing home, day care, camp and civil defense staff yet to train. Many of these people are not yet aware that they would have roles to play in an emergency response plan, and only training can rectify that situation.

We recognize that training is an ongoing process, and will never be complete, but our concerns are related to training on the implementing procedures. Some people have not been fully informed of their duties within those procedures, and we have no estimates of when the initial training sessions will be complete. Without this basic type of training, we can have little confidence in our emergency response plan.

A Test of the Plan

Finally, and in agreement with the sentiments of the surrounding towns, the Selectmen insist on participating in and judging a full test of the plan and procedures. We would like to see a simulated example of an emergency at Pilgrim Station. We would like to see many facets of the plan demonstrated: roster notifications, communications equipment tests, state

participation, facility operation and a few buses running pickup routes and precautionary transfer routes. Only after a successful test of the plan and implementing procedures will we feel public safety is well served. One might use the analogy of a football play drawn on a blackboard but never run in practice: we may have the X's and O's, but we have no idea how the team will work together.

Conclusion

We do know, however, the team works well together in the planning process because throughout the process Kingston town officials and many citizens have worked diligently on the emergency response program. They have offered their time on it not in the expectation that it would prevent injury or loss of life, nor that it could guarantee the safety of everyone in Kingston, but in the belief that having a well-thought-out emergency plan is far better than having no plan at all. They have been largely engaged in an Act of Faith during this process, and as such, have cooperated with all parties to the best of their abilities, but without benefit of the knowledge that the plan really works. We do believe that the state of Kingston's emergency preparedness has been increased by the level of planning that has been accomplished through the efforts of town officials. However, we feel that the issues discussed here regarding the implementing procedures must be addressed, training must be completed, equipment must be put in

place and a full-scale exercise must be conducted. We believe that an exercise will be the most realistic manner in which a determination can be made as to the readiness of the radiological emergency response program. In view of those sentiments, the Board of Selectmen of the Town of Kingston believes that the Pilgrim Nuclear Power Station should not be allowed to restart until an exercise has been conducted.

On behalf of the Town of Kingston, I would like to thank you for this opportunity to express the town's views on the status of radiological emergency preparedness in the town.

Thank you.

###



TOWN OF MARSHFIELD

870 MORaine STREET
MARSHFIELD, MASSACHUSETTS 02090
617-837-5141

December 6, 1988

United States Nuclear Regulatory Commission
Washington, D. C. 20555

Commission Members:

As the Town of Marshfield's representative from the Board of Selectmen, I would like to thank you for this opportunity to familiarize you with the status of our emergency planning. The process of emergency planning for Marshfield has been a long, arduous and incomplete process. Our Emergency Response Committee has worked prudently with Boston Edison personnel and our many public service groups to develop an Emergency Response Plan that suits the needs of our community in the event of an accident at the Pilgrim Nuclear Power Station.

Throughout that developmental process, the Board of Selectmen has actively reviewed the plan with comments on a number of occasions. On August 8, 1988, the Board unanimously took action on the current status of the Marshfield Plan, and in a letter to our Emergency Response Committee Chairman, Daniel A. McGonagle, the Board clearly and in no uncertain terms stated its position relative to the evolving nature of the plan.

I would like to read into the record the contents of that letter of August 8, 1988, which is attached to my statement.

Letter:

The Town of Marshfield has, in every capacity, acted in good faith to address the needs of our community in the event of an emergency at Pilgrim. It was distressing to have read the transcript of the September 29, 1988, "Review of Proposed Restart of the Pilgrim Nuclear Power Plant Meeting held in Plymouth, Mass.", at which time in his discussion of the plans to date, Mr. Ronald Bellamy can be quoted as saying:

"First the Town of Marshfield. The draft implementing procedures, a shelter implementation program and a cost reference of the FEMA- identified deficiencies with sections of the plans and procedures that address resolution have been approved by the Selectmen...."

It is important at this time, Commission members, and with all due respect for Mr. Bellamy to set the record straight. Our position on the status of our plan can be no more succinctly stated than to re-quote our August 8th concerns:

"It must be clearly understood that the Marshfield Board of Selectmen has NOT approved or endorsed the plan, and we still have major reservations regarding its viability. Realizing that neither the Board of Selectmen nor any other official in Town is adequately trained to skillfully evaluate all the merits and deficiencies of this proposal, we feel the time has come for the M.C.D.A. and F.E.M.A. to have direct professional input."

Mr. Chairman, it must be noted that we in the Town of Marshfield have put our best efforts forward to address the needs of our community for an incident of unknown magnitude and of which there is little understanding or consensus. The position of our Board has been that of cautious diligence. We are deeply concerned that there are remaining major structural concerns within the EPZ as to the procedures necessary to ensure the safety of our school children, waterfront user groups and the disproportionate number of elderly that have made this zone their home.

Furthermore, as Selectman representing the entire town, I feel it is ludicrous to entertain the notion that that the 90% of the Town of Marshfield that reside or do business outside the EPZ and that have not been addressed in our plan will not react to the deluge of media response to an accident at the Pilgrim Nuclear Power Station. We, therefore, must join our State Department of Public Safety in calling for protective actions "on a whole town basis". This will provide a conservative margin of safety, and it will avoid confusion regarding which parts of the community need to act.

Mr. Chairman, there are other issues on the periphery of the Pilgrim debate that are also of deep concern to many of the citizens of Marshfield when discussions of re-start occur. Some of these are well documented as major deficiencies in the operation of this facility. We in Marshfield have little technical expertise to assess the management capability of Boston Edison, the reported high cancer incidence in the five-town region or the reported high risk of failure associated with the GE Mark I containments like Pilgrim.

Mr. Chairman, you and your commission hold the legislated duty and responsibility to act prudently and responsibly to ensure the uncompromised public health and safety of our citizens as a vital component of re-start considerations.

Finally, Mr. Chairman, at this time we must support the overwhelming call from our congressional delegations of Senators Kennedy and Kerry, Congressman Studds, Governor Dukakis, the Massachusetts Department of Public Safety, the Massachusetts Civil Defense Agency and local officials for a full-scale exercise of off-site plans.

A plan that doesn't work is not a plan!

Thank you for your sincere concern for the residents of Marshfield.

Sincerely,



Daniel F. McDonald
Vice Chairman
Board of Selectmen
Marshfield, Massachusetts

DFM:1
enc.



TOWN OF MARSHFIELD

870 MORaine STREET
MARSHFIELD, MASSACHUSETTS 02050
617-837-5141

August 8, 1988

Mr. Daniel A. McGonagle, Chairman
Emergency Response Committee
107 Stagecoach Drive
Marshfield, MA 02050

Dear Mr. McGonagle:

The Marshfield Board of Selectmen has reviewed the draft document titled "Town of Marshfield Radiological Emergency Response Plan for Pilgrim Nuclear Power Station". We have offered suggestions and have agreed to forward the plan for further review and comment to the Massachusetts Civil Defense Agency and F.E.M.A. It must be clearly understood that the Marshfield Board of Selectmen has not approved or endorsed the plan, and we still have major reservations regarding its viability. Realizing that neither the Board of Selectmen nor any other official in town is adequately trained to skillfully evaluate all the merits and deficiencies of this proposal, we feel the time has come for the M.C.D.A. and F.E.M.A. to have direct professional input.

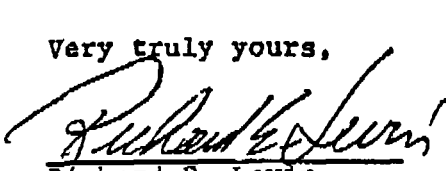
The issues of greatest concern to the Marshfield Board of Selectmen are as follows:

1. Adequacy of evacuation to Wellesley as opposed to Weymouth Air Base or University of Massachusetts in Dorchester or other more appropriate sites.
2. Concerns relative to actual traffic flow in a worst case scenario during evacuation.
3. Although the plan is specific concerning the Governor Winslow School (within the 10 mile zone), we believe general chaos could occur at the other schools as well with parents rushing to pick up children.
4. We need greater clarification of the ongoing training timetable and agenda with more attention given to inevitable personnel changes.
5. We have serious doubts regarding the willingness of local unions and other employee groups to remain at their posts and to cooperate during the evacuation.

Under no circumstances can this Board approve this document in good conscience unless and until a written letter of agreement is received from involved employee groups accepting their roles in the evacuation process and their expressed willingness to perform or in the alternative, personnel being provided by B.E.C.O. Additionally, any approval by this Board would require a concurrent endorsement by our yet-to-be-hired "Emergency Response Consultant". Although we agree that the current plan demonstrates a good faith effort by B.E.C.O., we feel any support for it would be premature at this time.

We ask that you forward this draft to the appropriate state and federal agencies for their constructive analysis.

Very truly yours,


Richard E. Levin
Chairman


John F. MacMahon


Daniel F. McDonald



OFFICE OF CIVIL DEFENSE

BOURNE, MASSACHUSETTS

The town of Bourne is located in southeastern Massachusetts, approximately 55 miles from Boston. It is comprised of 26,200 acres of land and 300 acres of fresh water. It has a year round population of 15,365 and a summer population of 35,900 based on 1985 censuses. Bourne is bordered on the north by the town of Plymouth, the east by Sandwich, the south by Falmouth, and the west by Wareham. Bourne has a 32 member police department and a 39 member fire department. The town center is located approximately 14 miles from Boston Edison's Pilgrim Station. One public school is located within the 12 mile radius, and three others within 15 miles.

A small portion of Bourne located at the northeast corner of town lies within the 10 mile radius of Pilgrim. Presently there are eight existing homes and construction has begun on a 77 unit housing development within this 10 mile radius.

Bourne has the distinction of having the Sagamore and Bourne Bridges. These two highway bridges, built in 1935, provide the only means for the general public to travel to and from Cape Cod. According to figures provided by the Cape Cod Planning and Economic Development Commission, Cape Cod has a year round population of 170,600 and a summer population of 500,000 (1986 Census figures). On the average day, the Sagamore and Bourne Bridges carry a total of 64,442 vehicles to and from Cape Cod.

In May 1987, the Town of Bourne requested through the Massachusetts Civil Defense Agency that the town be designated as part of the EPZ for Pilgrim. The request was made not to condemn or endorse the Pilgrim plant, but rather that Bourne and it's residents would be adequately prepared for an emergency at Pilgrim. Without being included in the EPZ Bourne would not receive any advance notification of an emergency at Pilgrim, and would therefor be severely hampered in providing services necessary to keep vehicular traffic moving and preventing panic, whether warranted or not, for the residents of Bourne.

In conclusion, Bourne requests to be included in Pilgrims EPZ for two reasons; first that our residents that live within the 10 mile radius receive the same consideration and planning as residents of other towns within the 10 mile radius; and secondly so that the town might better prepare for the traffic problems that will occur in the event of an emergency at Pilgrim Station.

TOWN OF BOURNE

- BOURNE IS LOCATED IN SOUTHEASTERN MASSACHUSETTS
- BORDERED ON NORTH BY PLYMOUTH, EAST BY SANDWICH, SOUTH BY FALMOUTH, WEST BY WAREHAM
- APPROXIMATELY 55 MILES SOUTH OF BOSTON
- YEAR ROUND POPULATION 15,365, SUMMER 35,000

AREA WITHIN 10 MILE RADIUS OF PILGRIM
PLANT

- PRESENTLY EIGHT RESIDENCES, BOTH
SEASONAL AND YEAR ROUND
- CONSTRUCTION UNDERWAY FOR
SEVENTY-SEVEN UNIT COMPLEX WITHIN 10
MILE RADIUS.

TRAFFIC CONCERNS

- THE SAGAMORE AND BOURNE BRIDGES, BUILT IN 1935, PROVIDE THE ONLY MEANS FOR THE PUBLIC TO TRAVEL TO AND FROM CAPE COD. CAPE COD HAS A YEAR ROUND POPULATION OF 170,600 AND A SUMMER POPULATION OF JUST OVER 500,000.
- AVERAGE DAILY VEHICULAR TRAFFIC ACROSS THE SAGAMORE AND BOURNE BRIDGES IS 64,442.

- IN THE EVENT OF AN INCIDENT REQUIRING THE EVACUATION SURROUNDING THE PILGRIM STATION, THE TOWN OF BOURNE IS NOT AWARE OF ANY TRAFFIC MANAGEMENT PLANS.
- CURRENTLY ON HOLIDAY WEEKENDS, THE TRAFFIC BACKUP IS 5-10 MILES FROM THE BRIDGES.

TOWN OF BOURNE REQUEST FOR
E P Z DESIGNATION

- MARCH 6, 1987 MASSACHUSETTS CIVIL DEFENSE AGENCY OFFERS TOWN OF BOURNE OPPORTUNITY TO BE DESIGNATED EPZ COMMUNITY.
- MAY 14, 1987 BOURNE REQUESTS INFORMATIONAL MEETING WITH MASS. CIVIL DEFENSE OFFICIALS REGARDING EPZ DESIGNATION.

- MAY 28, 1987 MASS. CIVIL DEFENSE
ACKNOWLEDGES RECEIPT OF TOWN OF BOURNE
REQUEST FOR EPZ DESIGNATION.
- JUNE 22, 1987 BOURNE RECEIVED
NOTIFICATION THAT THE GOVERNOR'S
OFFICE HAS APPROVED BOURNE'S REQUEST
TO SEEK INCLUSION IN EPZ.
- AUGUST 24, 1987 BOARD OF SEELCTMEN
FORWARD FORMAL REQUEST FOR INCLUSION
IN PILGRIM EPZ.

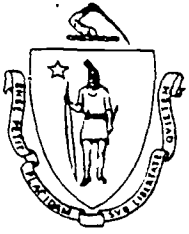
- DECEMBER 9, 1988 BOURNE BOARD OF
SELECTMEN REQUEST THAT THE NUCLEAR
REGULATORY COMMISSION INCLUDE BOURNE
IN PILGRIM EPZ.

PRESENT PUBLIC SAFETY CONCERNS

- PRESENTLY BOURNE IS NOT NOTIFIED OF INCIDENTS AT PILGRIM STATION.
- BOURNE DOES NOT HAVE OPPORTUNITY TO DEVELOP EMERGENCY PLANS DUE TO A LACK OF KNOWLEDGE OF ANY EXISTING PLANS.
- POSSIBILITY OF PANIC AMONG CITIZENS AND CONFUSION AMONG LOCAL OFFICIALS DUE TO A LACK OF PLANNING.

TOWN OF BOURNE REQUEST

- THE REQUEST BY THE TOWN OF BOURNE TO BE INCLUDED IN THE PILGRIM STATION EMERGENCY PLANNING ZONE IS MADE NOT TO CONDEMN OR ENDORSE THE PILGRIM POWER PLANT, BUT RATHER THAT BOURNE AND ITS RESIDENTS BE ADEQUATELY PREPARED FOR AN EMERGENCY AT PILGRIM STATION.



MICHAEL S. DUKAKIS
GOVERNOR

THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE DEPARTMENT

CIVIL DEFENSE AGENCY AND OFFICE OF EMERGENCY PREPAREDNESS
400 WORCESTER ROAD
P.O. BOX 1496
FRAMINGHAM, MASS. 01701-0317



ROBERT J. BOULAY
DIRECTOR

MAR - 9
RP &

March 6, 1987

Mr. Robert W. Parady, Chairman
Bourne Board of Selectmen
Bourne Town Hall
24 Perry Avenue
Buzzards Bay, MA 02532

<input checked="" type="checkbox"/>	ACTION	_____
<input type="checkbox"/>	ROUTE TO	_____
<input checked="" type="checkbox"/>	FILE	_____
INITIAL		RP & MB

Dear Mr. Mr. Parady:

As the Director of Massachusetts Civil Defense Agency and Office of Emergency Preparedness, I have the responsibility to designate communities which will be included in the Emergency Planning Zone (EPZ) for a nuclear power station.

Guidance from the federal government in the document "NUREG 0654" as well as Chapter 33 Appendix, Section 13-2b of the Massachusetts General Laws (attached) indicate that the EPZ should consist of all communities within ten miles of a nuclear power plant. Since a small portion of Bourne lies within ten miles of Pilgrim Station, I want to offer you the opportunity to be designated an EPZ community.

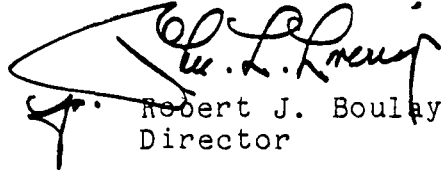
If designated an EPZ community, this agency will assist you, the Bourne Civil Defense Director, and other concerned officials with development of local plans for response to an accident at Pilgrim Station. The Boston Edison Company is expected to support the costs of any alert, notification, and communications equipment which the town must acquire to fulfill its obligations to implement the emergency plan.

It should be noted that Secretary of Public Safety Charles V. Barry in his December, 1986 report the the Governor on Safety at Pilgrim Station made the finding that present emergency response plans are not adequate and that it remains to be determined if adequate plans to respond to an accident at Pilgrim can in fact be developed. This offer does not constitute acknowledgement that adequate plans can be developed, nor would your agreement to join the EPZ indicate that you feel adequate plans are possible.

I want to advise you that the Executive Office of Public Safety is working with the state legislature to reach a consensus position on expanding the areas for which nuclear power plant emergency plans are prepared. However, it is possible that legislation will be enacted which expands the EPZ and I will advise you of any action on this matter.

If you will contact me at your earliest convenience, I will be happy to meet with you to discuss this offer at length.

Sincerely,



Robert J. Boulay
Director

RJB/kmm

cc: Secretary of Public Safety Charles V. Barry
Assistant Secretary Peter W. Agnes
Boston Edison Company
Bourne Civil Defense Director
Mr. Edward A. Thomas, Federal Emergency Management Agency
Members of the Legislative Commission to Study Pilgrim

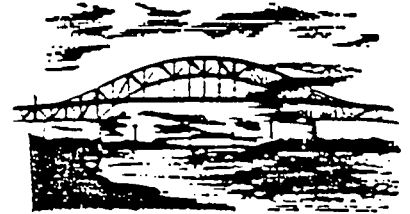


TOWN OF BOURNE

BOARD OF SELECTMEN

24 Perry Avenue
BUZZARDS BAY, MA 02532

TEL. 759-4486



ROBERT W. PARADY, CHAIRMAN
MARIE J. OLIVA
JAMES CIVILINSKI

May 14, 1987

Mr. Robert J. Boulay
Director
Massachusetts Civil Defense Agency
400 Worcester Road
P.O. Box 1496
Framingham, MA 01701-0317

Dear Mr. Boulay:

We are writing to reconfirm our position regarding the possibility of the Town of Bourne being included in the Emergency Planning Zone (E.P.Z.) for the Pilgrim Power Plant.

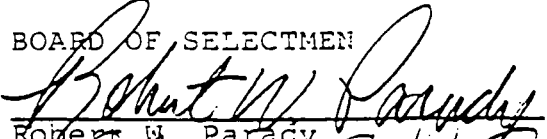
As per our earlier conversations, we have expressed an interest to join, but would like to reschedule a meeting that was previous cancelled by you so that we may make a firm decision and learn more about the E.P.Z.

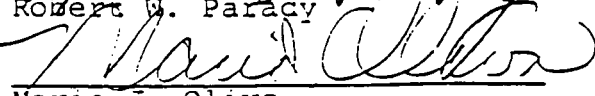
We would also like to go on record that because we have shown interest in the Emergency Planning Zone it does not constitute an endorsement to reopen the Pilgrim Power Plant.


We will patiently wait to hear from you.

Very truly yours,

BOARD OF SELECTMEN


Robert W. Parady

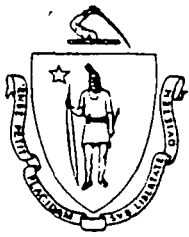

Marie J. Oliva


James Civilinski

JC/njs

cc: Charles Moyes
Bourne Civil Defense Director

Fire Chief Martin Jordan
Police Chief Dennis Mannix



MICHAEL S. DUKAKIS
GOVERNOR

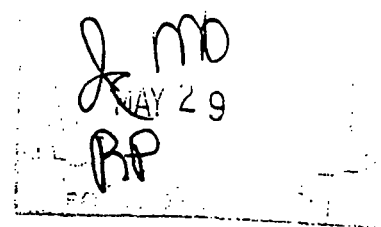
THE COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE DEPARTMENT
CIVIL DEFENSE AGENCY AND OFFICE OF EMERGENCY PREPAREDNESS
400 WORCESTER ROAD
P.O. BOX 1496
FRAMINGHAM, MASS. 01701-0317



ROBERT J. BOULAY
DIRECTOR

May 28, 1987

Mr. Robert W. Parady, Chairman
Bourne Board of Selectmen
Bourne Town Hall
24 Perry Avenue
Buzzards Bay, MA 02532



Dear Mr. Parady:

In a letter to you dated March 26, 1987, I offered the town of Bourne the opportunity to be designated an Emergency Planning Zone (EPZ) community for Pilgrim Nuclear Power Station. I have received your indication of interest in this designation and I am gratified by your cooperation.

At present, this agency is consulting with federal authorities on this matter, consistent with their regulations. Just as soon as this consultation process is complete, I will consider making a formal designation of Bourne as part of the Pilgrim EPZ. I will keep you informed of all issues relating to this matter.

If you have any questions or observations regarding this designation, please contact my Deputy Director, John Lovering, Program Manager for Pilgrim Planning, at 875-1381.

Thank you for your patience, I look forward to working with you to see that the public safety needs of your community are fulfilled.

Sincerely,

Robert J. Boulay
Director

RJB/kmm

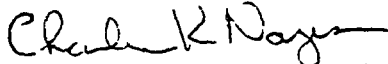
cc: Assistant Secretary Peter W. Agnes, Jr.
Deputy Director John Lovering
Mr. Charles Noys, Civil Defense Director of Bourne
Area II Director Thomas P. Rodger, MCDA/OEP

BP 22
JC

June 22, 1987

TO: Board of Selectmen
FROM: Charles K. Noye, CD Director
SUBJECT: Pilgrim Emergency Planning Zone

At approx 0930 hrs date, I received a telephone call from a Mr. Al Slanney, Area 2 Headquarters, MA Civil Defense. Mr. Slanney relayed a message from his office that Governor Dukakis had approved the Town of Bourne's request for inclusion in the Pilgrim Emergency Planning Zone. This inclusion is conditional pending consultation with the Federal Emergency Management Agency (FEMA) and the Nuclear Regulatory Agency (NRC).


Charles K. Noyes, Director
Bourne Civil Defense



TOWN OF BOURNE
Board of Selectmen
24 Perry Avenue
Buzzards, Bay, Massachusetts 02532
(617) 759-4486



ROBERT W. PARADY, CHAIRMAN
MARIE J. OLIVA
JAMES CIVILINSKI

August 24, 1987

Mr. Robert J. Boulay
Director
Massachusetts Civil Defense Agency
400 Worcester Road
P.O. Box 1496
Framingham, MA 01701-0317

Dear Mr. Boulay:

As you are aware, a portion of the town of Bourne lies within the 10-mile Emergency Planning Zone (EPZ) of the Pilgrim Nuclear Power Station located in Plymouth, MA. On Tuesday, August 11, 1987, the members of the Board of Selectmen, the town's Civil Defense Director and Police and Fire Chiefs were briefed by members of your staff, Mr. Lovering and Mr. Slaney relative to Public Safety issues involved and to questions that we had concerning this matter.

Consequently, please consider this communication as an official request to have the entire town of Bourne, or at least that portion of the town located north of the Cape Cod Canal, as part of the officially designated Emergency Planning Zone. This request is made pursuant to the following Legal Authority and Federal Regulatory Guidance.

1. Massachusetts General Laws, Chapter 33 Appendix Section 13 and Section 13-2B.
2. Criteria for Preparation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants (NUREG 0654) issued in 1980 by the Nuclear Regulatory Commission and the Federal Emergency Management Agency.

We also request that you petition the Nuclear Regulatory Commission and the Federal Emergency Management Agency to concur in our request to be so officially designated.

In addition, it is also important for us to ascertain from you and/or officials at the appropriate level and/or levels of government, the following: who would be responsible for providing this community with the resources (financial-equipment) which relate to:

1. Emergency Plan development and maintenance.
2. Equipment relating to an alert notification and public warning systems for key town officials and the population in general.
3. Emergency Operations Center enhancements (Command Channel Communications).
4. First responder training (annual) for the towns' public and private sector personnel who would be involved.
5. Costs incurred relative to Annual Exercise involvement.


All of the above programs, we understand, would be an integral part of the EPZ designation requirements.

We are sure you realize, Director Boulay, that as Selectmen we are vitally concerned with the Public Safety issues related to this program and respectfully request an expeditious answer to this communication.

Finally, we take the opportunity to again emphasize that this official request to be designated an Emergency Planning Zone community does not in any way constitute an endorsement to reopen the Pilgrim Nuclear Power Plant located in Plymouth, Massachusetts.

Very truly yours,

BOARD OF SELECTMEN

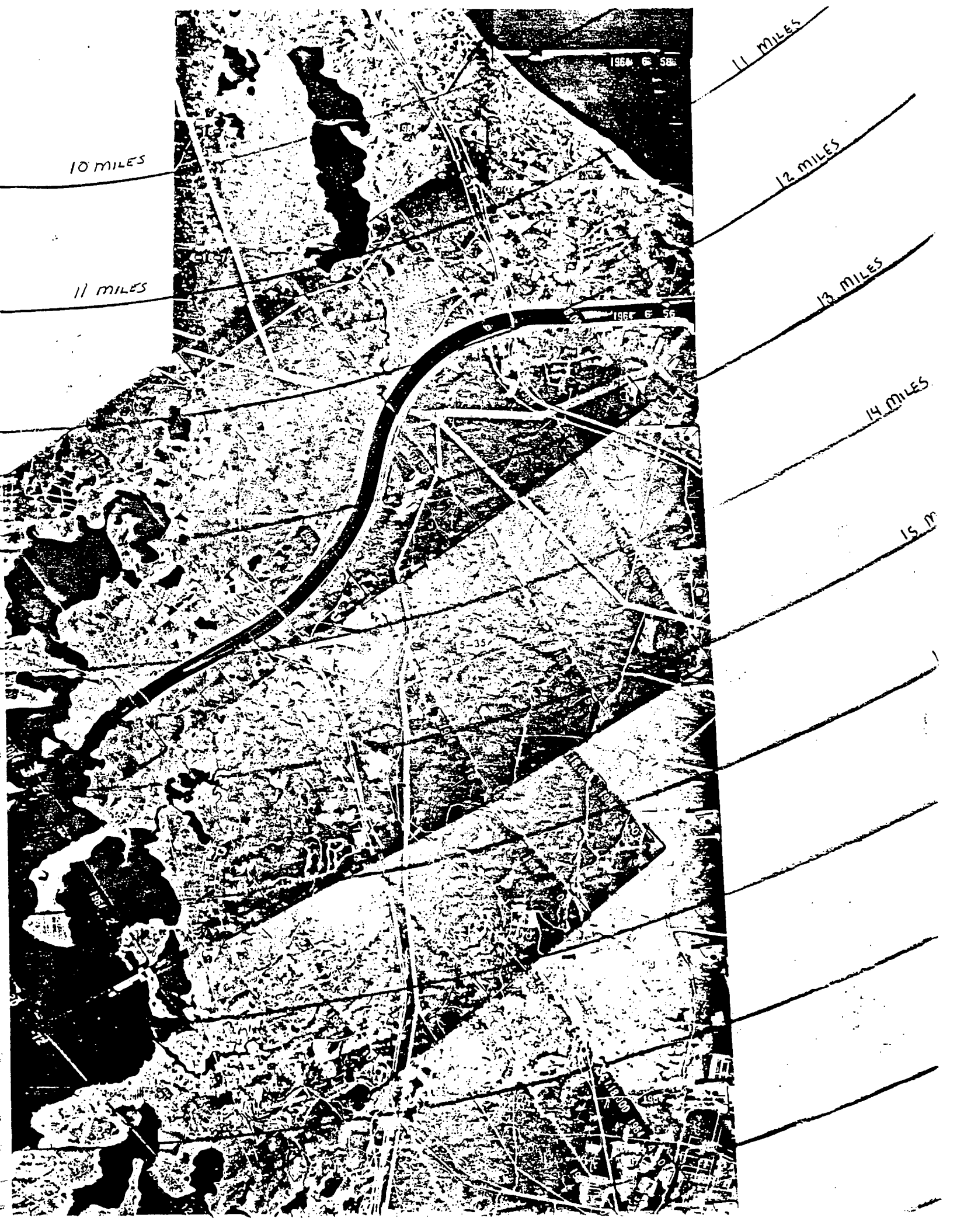

Robert W. Parady, Chairman


Marie J. Oliva


James Civilinski

njs

cc: Charles V. Barry, Secretary E.O.P.S. (Att: Peter Agnes)
Boston Edison Co., Att: Ralph Bird, V.P. Nuclear
Operations
Charles K. Noyes, Bourne Civil Defense Director



1964 G 58

1964 G 56

5-35

1964

1964

OUTLINE

TESTIMONY OF ANN WAITKUS-ARNOLD
MASSACHUSETTS OFFICE OF HANDICAPPED AFFAIRS
NUCLEAR REGULATORY COMMISSION, ROCKVILLE, MARYLAND
DECEMBER 9, 1988

PILGRIM I STATION-RADIOLOGICAL EMERGENCY RESPONSE PLANNING

1. Preliminary Remarks
2. Present Status of Radiological Emergency Plans for People with Disabilities
3. Proposed Comprehensive Project by MOHA
 - a. Goals and Objectives
 - b. Special Implications
 - c. Feasibility Aspect
4. Position of the Office of Handicapped Affairs
5. Closing Remarks

TESTIMONY
OF
ANN WAITKUS-ARNOLD

DISABLED PERSONS ADVISORY GROUP ON NUCLEAR EVACUATION
THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF HANDICAPPED AFFAIRS

NUCLEAR REGULATORY COMMISSION, ROCKVILLE, MARYLAND
DECEMBER 9, 1988

Good afternoon, Mr. Chairman. Thank you for inviting me to speak here today. As Chairwoman for the Disabled Persons Advisory Group on Nuclear Evacuation, I have been intimately involved in emergency planning procedures for all nuclear plants affecting the one million disabled people in Massachusetts.

The Massachusetts Office of Handicapped Affairs initiated the first meetings with officials from Boston Edison several years ago about Emergency Planning for people who cannot evacuate on their own, and we have pursued this issue in the intervening time by forming a Working Group on Disability Issues and Emergency Planning in the event of an accident at the Pilgrim Nuclear Power Station. We have suggested a proposal be commissioned for a Comprehensive Project to determine Emergency Planning needs for people who require assistance.

The current status of planning for elderly and disabled people and others with special needs is grossly inadequate. The Evacuation Time Estimate figures, developed by Boston Edison, are completely inaccurate. Boston Edison has used these figures as if they were correct over the strong opposition from the Office of Handicapped Affairs. We feel Beco is acting in bad faith. The research methods for this document were seriously flawed, thus the figures Beco arrived at are invalid. For example, Beco alleges that approximately 1% of the population is disabled, when the latest Harris Polls for the U.S. Disability Census show actual figures of 17%, most of whom would need assistance in an emergency. We also know that the fastest growing population in this country are people over 65, the majority of whom have disabilities. Thus, Beco's reassurances cannot be relied on. The addition of thousands more people in the Pilgrim EPZ needing special arrangements and care could throw the entire Evacuation Plans into disarray, therefore, Beco's erroneous figures for the Special Needs Population actually invalidate all of the ETE results which are used as a basis for any planning that is being proposed. Attempts to have this population self-identify also have not worked. Full page ads in several local newspapers have only elicited 10 responses. This extremely low response is no surprise to this Agency;

historically, the self-identification process for this target population has never worked.

The legal definition of a disabled person is- any person who has an impairment that limits one or more major activities of daily living. This includes people who have problems with walking, talking, seeing, hearing, breathing, or thinking. This definition encompasses people with developmental disabilities, medically fragile persons, elderly persons, persons with mental illness, persons with sensory or physical limitations, temporarily disabled persons, and the transitory population-disabled individuals who leave their place of residence for school, sheltered employment or adult care, and travel in and out of the EPZ for these services. We presume that other special needs populations-schools, nursing homes, hospitals and group homes will be planned for separately.

The Comprehensive Survey goals deserve particular attention. The task of this project goes far beyond the development of rough estimates of numbers of people with disabling conditions in the area who might need accessible transportation. The challenge is much more complex. We must to develop an area profile showing the known and probable distribution of disabled people at several specific times reflecting working and non-working hours and weekends; we must determine how the evacuation of the general population will effect evacuating people who need special assistance; we must develop current standards for people who may be at too great a risk to evacuate, including evaluating the attendant risks of remaining behind - these people could include hospitalized infants, children and adults, nursing home patients, and people on life support systems at home. They could be any one of us unfortunate enough to be hospitalized for a serious condition during a radiological emergency. Who will stay behind with these people? There must be agreements made with people who are willing to remain behind and provide care for those who can't be moved. These workers would have to be provided with specialized training for dealing with a radiological accident and the risk of having to take Potassium Iodide along with their patients.

The most critical facet of the plan is the requirement for a Functional Skills Assessment for the communities involved in terms of supervision and assistance. In order for proper planning to occur, this assessment must be conducted in relation to residence and location in the community, and must provide for transitory populations. What levels of assistance will people need to safely evacuate? Also, the plan must address people with low incidence disabilities. These people, such as a person who is a quadraplegic, would require continuous very specialized planning and care to survive, even in a sheltering situation. Their living situation and formal support requirements must be assessed, as well as their general environment including

daily activities in correlation with the general evacuation process. Throughout the process of this proposal's development, Beco agreed to pay for the project. However, several months after its completion, Beco reneged on their agreement. They have failed to act in good faith, once again, and we are left facing a potentially dangerous situation with no factual data. Valid planning is not possible in such an information vacuum.

There must be an honest evaluation of the feasibility of actually evacuating and caring for all of the men, women and children in this EPZ who comprise the Special Needs Population. As you know, the population in Plymouth has almost tripled since Pilgrim Station went on line 16 years ago, and the two lane evacuation routes are often bumper to bumper traffic, even in normal situations. Evacuation routes are over burdened during normal use, but especially in summertime. As presently planned, evacuation activities of the general population will make it impossible to evacuate the sizeable numbers of people with special needs. Slipshod preparations proposed by Beco with the NRC's apparent agreement, are highlighted by recent statements that "present planning is sufficient for re-start". Since there is no planning for the special needs population, this clearly discriminates against that population, and is, thus, a violation of the Massachusetts Constitution Amendment 114. This law guarantees equal protection for people with disabilities in Massachusetts. There are also questions as to whether this discriminatory behavior violates federal law. What is required is the guarantee that citizens of Massachusetts with special needs have an equal opportunity to leave an area around a nuclear power plant during a radiological accident.

It is illogical and duplicitous to go to low power, the only object of which is to go to full power, without any viable plan for evacuating the population. It is our position that Pilgrim Station should remain closed until and unless safe evacuation plans can be made for all people.



The Commonwealth of Massachusetts
Office of Handicapped Affairs
One Ashburton Place — Room 1305
Boston 02108

MICHAEL S. DUKAKIS
Governor

JIM GLEICH
Director

727-7440
Voice & TDD
1-800-322-2020
Voice & TDD

FOR IMMEDIATE RELEASE
DECEMBER 4, 1987

CONTACT: LORRAINE GREIFF
617-727-7400

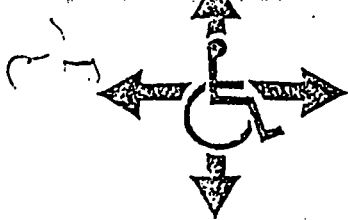
PRESS RELEASE

ANN WAITKUS-ARNOLD APPOINTED CHAIRWOMAN OF DISABLED PERSONS
ADVISORY GROUP ON NUCLEAR EVACUATION

ANN WAITKUS-ARNOLD OF PLYMOUTH WAS RECENTLY APPOINTED BY THE MASSACHUSETTS OFFICE OF HANDICAPPED AFFAIRS TO BE CHAIRWOMAN OF THE DISABLED PERSONS ADVISORY GROUP ON NUCLEAR EVALUATION. THE PURPOSE OF THE ADVISORY COMMITTEE IS TO MAKE RECOMMENDATIONS TO THE STATE-WIDE TASK FORCE ON CIVIL DEFENSE TO INSURE INCLUSION IN EVACUATION PLANNING FOR PEOPLE WHO ARE ELDERLY AND/OR DISABLED IN ALL AREAS OF THE STATE NEAR NUCLEAR POWER STATIONS.

THE ADVISORY GROUP CONSISTS OF ADVOCATES WHO ARE DISABLED FROM THROUGHOUT THE STATE. IT HAS MET WITH BOSTON EDISON, YANKEE ATOMIC, AND THE MASSACHUSETTS CIVIL DEFENSE AGENCY. IT IS EXPECTED TO RECOMMEND THE HIRING OF A PROFESSIONAL CONSULTANT TO RESEARCH THE DEMOGRAPHICS OF PEOPLE WITH DISABILITIES NEAR NUCLEAR POWER PLANTS; TO DETERMINE THEIR NEEDS IN THE EVENT OF AN EMERGENCY; TO DETERMINE WHICH PEOPLE IF ANY, CANNOT BE EVACUATED; AND TO DETERMINE THE ATTENDENT RISKS IN REMAINING WHERE THEY ARE.

"THIS ADVISORY GROUP IS A CRITICAL FIRST STEP IN THE STATEWIDE EFFORT TO DEAL WITH EMERGENCY EVACUATION PROCEDURES FOR ALL PEOPLE," ACCORDING TO JIM GLEICH, DIRECTOR OF THE MASSACHUSETTS OFFICE OF HANDICAPPED AFFAIRS.



The Disabled Persons' Advisory Group
on
Nuclear Evacuation

Ann Waitkus-Arnold
Chair

Post Office Box 3803
Plymouth, MA 02361

617-747-4574
Voice & TDD

STATEMENT OF
ASSISTANT SECRETARY PETER W. AGNES, JR.
IN BEHALF OF
MASSACHUSETTS EXECUTIVE OFFICE OF PUBLIC SAFETY
SECRETARY CHARLES V. BARRY
BEFORE THE
UNITED STATES NUCLEAR REGULATORY COMMISSION

Rockville, Maryland
December 9, 1988

GOOD AFTERNOON CHAIRMAN ZECH AND COMMISSIONERS. THE MASSACHUSETTS SECRETARY OF PUBLIC SAFETY IS PLEASED AT THE OPPORTUNITY TO ADDRESS THE COMMISSION ON THE STATUS OF OFF-SITE PREPAREDNESS FOR AN ACCIDENT AT PILGRIM NUCLEAR POWER STATION.

THIS MEETING IS LONG OVER-DUE. THOSE HERE TODAY SHOULD BEAR IN MIND THAT IT WAS THE COMMONWEALTH OF MASSACHUSETTS -- NOT THE NUCLEAR RREGULATORY COMMISSION AND NOT THE FEDERAL EMERGENCY MANAGEMENT AGENCY -- WHICH FIRST DREW ATTENTION TO THE ISSUES WE ARE GATHERED TO DISCUSS. AS A RESULT OF GOVERNOR DUKAKIS' INITIATIVE, WE PRODUCED THE FIRST COMPRHENSIVE REPORT ANALYSING EMERGENCY PREPAREDNESS FOR AN ACCIDENT AT PILGRIM STATION IN DECEMBER OF 1986. THAT 200 PAGE REPORT WAS THE FIRST TO DOCUMENT THAT EMERGENCY PLANNING IN THE PILGRIM AREA WAS WOEFULLY INADEQUATE. IT IS INTERESTING TO US THAT NEARLY TWO YEARS AFTER THAT REPORT WAS ISSUED, WE HAVE YET TO RECEIVE ANY FORMAL RESPONSE TO ITS CONCLUSIONS FROM THE NRC. IN AUGUST OF 1987, FEMA PUBLISHED ITS OWN "SELF INITIATED REVIEW" WHICH ECHOED THE FINDINGS OF OUR REPORT AND WITHDREW INTERIM APPROVAL OF PILGRIM EMERGENCY PLANS. FEMA HAS YET TO RESTORE ITS APPROVAL.

PETER W. AGNES, JR.

DECEMBER 9, 1988

IN THE SUMMER OF 1987, THE COMMONWEALTH SPONSORED THE FIRST OF MANY OPEN PUBLIC MEETINGS AT WHICH CITIZENS AND LOCAL OFFICIALS WERE INVITED TO DISCUSS EMERGENCY PREPAREDNESS AND THEIR SAFETY. THE COMMONWEALTH HAS HELD TWENTY-ONE PUBLIC FORUMS IN THE INTERVENING MONTHS. ALSO, STAFF OF OUR NUCLEAR SAFETY EMERGENCY PREPAREDNESS PROGRAM HAS HELD 77 WEEKLY WORKING MEETINGS WITH EPZ PUBLIC SAFETY OFFICIALS AND ATTENDED MORE THAN 180 MEETINGS OF LOCAL BOARDS AND COMMITTEES REGARDING EMERGENCY PREPAREDNESS. IN JANUARY OF 1988, SENATOR KENNEDY HELD HEARINGS IN THE EPZ TO SEEK PUBLIC TESTIMONY ON EMERGENCY PREPAREDNESS. WHILE THE NRC STAFF WILL TELL YOU THAT THEY HAVE HELD MEETING AFTER MEETING WITH EPZ RESIDENTS, LET THE RECORD SHOW THAT UP UNTIL TODAY, THE COMMISSION HAS NOT ONCE HOSTED A SINGLE PUBLIC MEETING TO HEAR FROM LOCAL AND STATE OFFICIALS ON OFF-SITE EMERGENCY PREPAREDNESS FOR THE PILGRIM EPZ. GIVEN THE SERIOUS NATURE OF THE SUBJECT, I THINK THAT THIS IS A DEPLORABLE RECORD FOR A FEDERAL REGULATORY BODY WHOSE SPECIFIC CHARGE IS PROTECTION OF PUBLIC HEALTH AND SAFETY.

ON TWO OCCASIONS, THE NRC HAS ADDRESSED OFF-SITE EMERGENCY PREPAREDNESS. IN A MEETING HERE, ON OCTOBER 6, LOCAL OFFICIALS OF EPZ COMMUNITIES HAD HOPED TO INFORM YOU OF THEIR CONCERNS BUT WERE DENIED THE OPPORTUNITY TO SPEAK. ON OCTOBER 14 ANOTHER MEETING WAS HELD IN WHICH THE NRC STAFF DISCUSSED EMERGENCY PREPAREDNESS WITH THE COMMISSIONERS AND WHERE WE WERE FORCIBLY DENIED THE OPPORTUNITY TO REBUT BLATANT MISREPRESENTATIONS BY THE STAFF. IN FACT, ON OCTOBER 14 YOUR OWN

PETER W. AGNES, JR.

DECEMBER 9, 1988

STAFF STATED THAT THEY HAD MET WITH PUBLIC OFFICIALS OF EPZ COMMUNITIES TO DISCUSS THE STATUS OF PLANNING, A STATEMENT WHICH WAS CLEARLY NOT TRUE. A SERIES OF MEETINGS WAS HELD BY YOUR STAFF WITH EPZ AND HOST COMMUNITIES BETWEEN OCTOBER 25 AND NOVEMBER 2, 1988, WHICH HAS BEEN DOCUMENTED IN A SERIES OF UNDATED MEMORANDA FROM MR. WILLIAM LAZARUS TO MR. WILLIAM T. RUSSELL. SHORTLY THEREAFTER, I MET WITH REPRESENTATIVES OF SEVERAL EPZ COMMUNITIES AND IT WAS THE UNANIMOUS SENSE OF THE TOWNS REPRESENTED THAT THE LAZARUS MEMORANDA DID NOT ACURATELY REFLECT THE NUMBER AND SEVERITY OF UNRESOLVED PLANNING ITEMS. TODAY YOU WILL HEAR SEVERAL LOCAL OFFICIALS EXPAND ON THESE VERY ISSUES.

LET ME SAY AT THE OUTSET THAT THE COMMONWEALTH OF MASSACHUSETTS IS NOT OPPOSED CATEGORICALLY TO THE OPERATION OF PILGRIM NUCLEAR POWER STATION. HOWEVER, WE WILL NOT SUPPORT THE RESTART OF PILGRIM STATION UNTIL WE ARE SATISFIED THAT A PLAN EXISTS WHICH SATISFIES EVERY REQUIREMENT OF NUREG 0654 AND ALL OTHER REGULATORY CRITERIA. NOR CAN WE SUPPORT RESTART UNTIL WE ARE CERTAIN THAT PUBLIC SAFETY CAN BE PROTECTED IN THE EVENT OF A NUCLEAR ACCIDENT AS DEMONSTRATED IN A FULL-SCALE, GRADED EXERCISE OF THOSE EMERGENCY PLANS. FURTHER, WE DO NOT BELIEVE THAT PILGRIM SHOULD BE AUTHORISED TO RESTART UNTIL BOSTON EDISON DEMONSTRATES ITS ABILITY TO OPERATE THE FACILITY IN A RESPONSIBLE AND SAFE MANNER. AT THIS MOMENT WE LACK CONFIDENCE IN ALL OF THESE REGARDS.

TODAY YOU WILL HEAR FROM LOCAL OFFICIALS SERVING TOWNS IN THE PILGRIM EMERGENCY PLANNING ZONE ABOUT THE STATUS OF EMERGENCY PREPAREDNESS IN THEIR OWN COMMUNITIES. THESE ARE INDIVIDUALS WHO ARE CHARGED WITH THE RESPONSIBILITY OF PROTECTING THE HEALTH, SAFETY, AND PROPERTY OF THE CITIZENS THEY ARE ELECTED AND APPOINTED TO SERVE. YOU SHOULD LISTEN CAREFULLY TO WHAT THEY HAVE TO TELL YOU, BECAUSE IT IS THESE LOCAL OFFICIALS -- NOT THE NUCLEAR REGULATORY COMMISSION -- WHO MUST REACT PROMPTLY AND EFFECTIVELY SHOULD THERE EVER BE AN ACCIDENT AT PILGRIM NUCLEAR POWER STATION. EACH COMMUNITY HAS TOILED IN GOOD FAITH TO PRODUCE THE BEST POSSIBLE PLAN AND PROGRAM FOR EMERGENCY RESPONSE BUT TO DATE NOT ONE COMMUNITY HAS EXPRESSED SUFFICIENT CONFIDENCE IN THEIR PLAN TO ENDORSE IT FOR THE PURPOSE OF HOLDING AN EMERGENCY EXERCISE.

I DEEPLY REGRET THAT THE FEDERAL EMERGENCY MANAGEMENT AGENCY -- THE ONE FEDERAL AUTHORITY EXCLUSIVELY CHARGED TO DEAL WITH EMERGENCY PREPAREDNESS -- HAS NOT PARTICIPATED IN ANY OF OUR PLANNING ACTIVITIES. IN A MEETING I HELD WITH FEMA REGIONAL DIRECTOR HENRY VICKERS IN OCTOBER, 1987, MR. VICKERS PROMISED THAT A MEMBER OF HIS STAFF WOULD BE DELEGATED TO WORK WITH THE COMMONWEALTH AND LOCAL GOVERNMENTS IN EMERGENCY PLANNING. NO SUCH ACTION WAS EVER TAKEN. ON NOVEMBER 18, 1988, I WROTE TO FEMA NATIONAL DIRECTOR JULIUS BECTON ASKING WHETHER PILGRIM IS THE ONLY NUCLEAR POWER STATION IN THE COUNTRY FOR WHICH FEMA HAS WITHDRAWN INTERIM APPROVAL OF EMERGENCY PLANS AND FOR WHICH EVERY STATE AND LOCAL AUTHORITY HAS EXPRESSED ITS LACK OF CONFIDENCE IN

PETER W. AGNES, JR.

DECEMBER 9, 1988

EMERGENCY PREPAREDNESS. TO DATE WE HAVE RECEIVED NO RESPONSE TO THIS SIMPLE INQUIRY.

FEMA HAS BEEN INVITED TO JOIN EVERY MEETING HELD AT WHICH EMERGENCY PLANNING WAS DISCUSSED, INCLUDING OUR WEEKLY EPZ WORKING GROUP MEETINGS, BUT THEY HAVE CHOSEN NOT TO ACCEPT OUR INVITATIONS. IN FACT FEMA FAILED TO SEND A REPRESENTATIVE TO A MEETING BETWEEN MYSELF AND MR. WILLIAM LAZARUS OF THE NRC'S REGIONAL OFFICE ON AUGUST 22, 1988, AT WHICH WE GAVE A COMPREHENSIVE REVIEW OF THE STATUS OF OFF-SITE PLANNING. ON OCTOBER 13, 1988, WE RECEIVED A LETTER FROM MR. VICKERS IN WHICH HE STATES THAT "BEFORE WE FULLY RESPOND TO YOUR SEPTEMBER 2 AND 29, 1988, LETTERS, WE WOULD LIKE AN OPPORTUNITY TO CAREFULLY STUDY AND REVIEW THE REPORT TO THE GOVERNOR..." I ASK TODAY, ON DECEMBER 9, HOW LONG DOES IT TAKE FEMA -- YOUR SISTER AGENCY WITH WHICH THE NRC HAS A LETTER OF AGREEMENT CONCERNING ASSESSMENT OF OFF-SITE EMERGENCY PREPAREDNESS -- TO RESPOND TO IMPORTANT REQUESTS FOR INFORMATION AND ANALYSES? MOREOVER, IF THERE IS ONE REPRESENTATIVE HERE TODAY FROM THE FEDERAL EMERGENCY MANAGEMENT AGENCY, I ASK THAT YOU ACKNOWLEDGE YOUR PRESENCE AND STATE YOUR CONCERNS FOR EMERGENCY PREPAREDNESS AT PILGRIM STATION.

AS YOU, THE NUCLEAR REGULATORY COMMISSION, SITS POISED TO AUTHORIZE RESTART OF PILGRIM STATION, I WOULD LIKE YOU TO EXPLAIN TO THE ASSEMBLED PUBLIC OFFICIALS HOW YOU CAN IN ALL CONSCIENCE IGNORE THE FACT THAT FEMA HAS WITHDRAWN AND NEVER RESTORED ITS APPROVAL OF THE PILGRIM EMERGENCY PLANS. THE COMMONWEALTH OF MASSACHUSETTS AND EVERY COGNISANT LOCAL GOVERNMENT IS HERE TO

PETER W. AGNES, JR.

DECEMBER 9, 1988

TELL YOU THAT WE DO NOT AT PRESENT HAVE ADEQUATE EMERGENCY PLANS. I ASK, JUST HOW DO YOU THE COMMISSIONERS JUSTIFY RESTARTING PILGRIM STATION WHEN EVERY SINGLE CONCERNED PUBLIC OFFICIAL -- FEDERAL, STATE, AND LOCAL -- OTHER THAN THE NRC MAINTAINS THAT EMERGENCY PREPAREDNESS FOR AN ACCIDENT AT PILGRIM STATION IS NOT ADEQUATE?

THE SECRETARY OF PUBLIC SAFETY HAS SENT THE GOVERNOR THREE REPORTS ON SAFETY AT PILGRIM, IN DECEMBER OF 1986, DECEMBER OF 1987, AND OCTOBER OF 1988, ALL OF WHICH HAVE BEEN MADE AVAILABLE TO THE COMMISSIONERS. EACH OF THESE REPORTS HAS DISCUSSED IN DETAIL THE SERIOUS DEFICIENCIES WE HAVE FOUND IN OFF-SITE EMERGENCY PREPAREDNESS, AND I WANT TO TAKE A MOMENT TO REVIEW A NUMBER OF ITEMS FROM THE SECRETARY'S OCTOBER, 1988 REPORT WHICH REMAIN TO BE RESOLVED.

EMERGENCY PLANNING DEFFICIENCIES

PERHAPS THE MOST IMPORTANT PENDING ITEM IS IMPLEMENTING PROCEDURES FOR EACH COMMUNITY'S EMERGENCY RESPONSE PLAN. THESE PROCEDURES HELP DETERMINE THAT NO ELEMENT OF EMERGENCY RESPONSE IS LEFT TO AD HOC ACTION AND THAT ALL ACTIVITIES ARE SUPPORTED BY ACTUAL OPERATIONAL CAPABILITIES. I HAVE FOR YOU TODAY A STATUS REPORT ON THE DEVELOPMENT OF IMPLEMENTING PROCEDURES BY EACH COMMUNITY. HOWEVER, LET ME NOTE THAT WE HAVE NOT RECEIVED A SET OF IMPLEMENTING PROCEDURES WHICH HAVE BEEN APPROVED BY LOCAL OFFICIALS FROM ANY OF THE FIVE EPZ OR TWO HOST COMMUNITIES. FIVE OF THE TOWNS HAVE FORWARDED DRAFT PROCEDURES TO US AND WE HAVE

PETER W. AGNES, JR.

DECEMBER 9, 1988

SENT THESE AND OTHER PLANNING DOCUMENTS TO FEMA FOR "INFORMAL TECHNICAL REVIEW" MORE THAN TWO MONTHS AGO. OUT OF MORE THAN 300 PROCEDURES UNDER CONSIDERATION BY THE SEVEN COMMUNITIES, ONLY 190 HAVE BEEN APPROVED IN CONCEPT BY LOCAL ELECTED OFFICIALS. TWO EPZ COMMUNITIES DO NOT FEEL SUFFICIENTLY COMFORTABLE YET WITH THE PROCEDURES THEY HAVE DEVELOPED TO EVEN HAVE SUBMITTED THEM TO US AND FEMA IN DRAFT FORM.

DESPITE THE BEST EFFORTS OF STATE AND LICENSEE OFFICIALS, WE HAVE YET TO UNDERTAKE A COMPREHENSIVE SURVEY OF PEOPLE WITHIN THE EMERGENCY PLANNING ZONE WITH SPECIAL NEEDS REQUIRING EXCEPTIONAL ASSISTANCE DURING AN EMERGENCY. A REPRESENTATIVE OF THE MASSACHUSETTS OFFICE OF HANDICAPPED AFFAIRS IS WITH US TODAY TO ADDRESS YOU ON THE SPECIFIC ISSUES RELATING TO PEOPLE WITH SPECIAL NEEDS.

OFF-SITE COMMUNICATIONS IN THE EVENT OF AN ACCIDENT AT PILGRIM STATION IS VITAL TO EFFECTIVE EMERGENCY RESPONSE. STATE AND LOCAL OFFICIALS HAVE WORKED DILIGENTLY WITH THE LICENSEE TO INSTALL A NEW OFF-SITE NOTIFICATION SYSTEM. NONETHELESS, AS OF THIS MOMENT TRAINING HAS NOT BEEN COMPLETED FOR ALL PERSONNEL WHO MUST OPERATE THIS SYSTEM AND THE SYSTEM HAS NOT BEEN SUBJECTED TO A FULL TEST. NOTE THAT IN NOVEMBER, 1987, THE LAST TIME THAT AN UNUSUAL EVENT WAS DECLARED AT PILGRIM, NOT ALL OFFICIALS WERE NOTIFIED WITHIN FIFTEEN MINUTES. THEREFORE, I HAVE NO BASIS TO SAY THAT WE ARE CAPABLE EVEN OF NOTIFYING ALL OFF-SITE AUTHORITIES OF AN ACCIDENT AT PILGRIM STATION, AS REQUIRED BY FEDERAL REGULATIONS.

THE LAST SECTION OF THE EVACUATION TIME ESTIMATE AND TRAFFIC MANAGEMENT ANALYSIS COMMISSIONED BY BOSTON EDISON WAS NOT RECEIVED UNTIL LATE IN OCTOBER OF THIS YEAR. THE ETE AND TRAFFIC MANAGEMENT PLAN ARE ENORMOUSLY COMPLEX AND IN THE SPACE OF TWO MONTHS, WE HAVE NOT YET BEEN ABLE TO ASSESS THE ADEQUACY OF THE VERY IMPORTANT RECOMMENDATIONS THEY CONTAIN. THIS IS ESPECIALLY CRUCIAL WHERE TRAFFIC MANAGEMENT ACTIONS MUST BE IMPLEMENTED BY LOCAL LAW ENFORCEMENT PERSONNEL FROM AS MANY AS 40 COMMUNITIES THROUGH WHICH TRAFFIC COULD PASS ON THE WAY TO RECEPTION FACILITIES. FURTHER, TRAINING FOR MANY OF THESE LOCAL LAW ENFORCEMENT PERSONNEL HAS NOT EVEN BEEN INITIATED.

IN SPEAKING WITH LOCAL OFFICIALS FROM EACH COMMUNITY PRIOR TO DEVELOPING OUR OCTOBER, 1988 REPORT, I LEARNED THAT THE COMMUNITIES GENERALLY FEEL THAT THEY DO NOT HAVE ADEQUATE PERSONNEL IDENTIFIED TO FULFILL ALL EMERGENCY FUNCTIONS DETAILED IN THEIR DRAFT PLANS. WE WILL NOT CERTIFY THAT PLANS ARE ADEQUATE UNTIL IT HAS BEEN DEMONSTRATED THAT ALL LOCAL AS WELL AS STATE RESPONSE AGENCIES CAN FILL THEIR EMERGENCY PERSONNEL ROSTERS.

WE REMAIN CONCERNED THAT WE DO NOT HAVE RECEPTION CENTERS THAT ARE CAPABLE OF PROVIDING ALL REQUIRED SERVICES TO EVACUEES, INCLUDING RADIOLOGICAL MONITORING AND DECONTAMINATION. THE STATE AND THE LICENSEE ARE ACTIVELY ENGAGED IN A PROCESS UNDER WHICH THE NECESSARY CAPITAL IMPROVEMENTS WILL BE MADE TO THE DESIGNATED STATE INSTITUTIONS WHICH WILL SERVE AS RECEPTION CENTERS. NONETHELESS, THESE IMPROVEMENTS HAVE NOT BEEN COMPLETED AND WE

PETER W. AGNES, JR.

DECEMBER 9, 1988

CANNOT SAY THAT WE CAN PROVIDE EVEN RADIOLOGICAL MONITORING TO EVACUEES IN A TIMELY MANNER.

PERHAPS OUR MOST VULNERABLE POPULATION IS CHILDREN OF SCHOOL AGE. WHILE SIGNIFICANT PROGRESS HAS BEEN MADE IN DRAFTING BETTER PLANS FOR THEIR CARE, WE HAVE A DISTANCE TO GO IN PROVIDING TRAINING TO THE TEACHERS AND OTHER SCHOOL PERSONNEL RESPONSIBLE FOR PROTECTING CHILDREN IN THE EVENT OF A NUCLEAR ACCIDENT. MOREOVER, NOT ALL EPZ TOWNS HAVE ENUNCIATED A CLEAR POLICY ON EARLY CLOSING OF SCHOOLS AND WHETHER CHILDREN WILL BE KEPT TOGETHER OR DISMISSED.

THE FEDERAL EMERGENCY MANAGEMENT AGENCY HAS REASSESSED ITS POLICY ON SHELTER AS A PROTECTIVE ACTION, AND NOW CLAIMS THAT IT IS UNNECESSARY AS AN ELEMENT OF EMERGENCY RESPONSE PLANNING. WE BELIEVE THAT THIS IS A VERY UNWISE DECISION GIVEN THE RANGE OF ACCIDENT SCENARIOS POSTULATED FOR NUCLEAR FACILITIES. WE ARE REQUIRING THAT EACH EPZ TOWN HAVE A SHELTER UTILIZATION PLAN TO PROVIDE PROTECTION TO THE MAXIMUM RESIDENT AND TRANSIENT POPULATION, INCLUDING PEOPLE AT BEACHES AND OTHER RECREATION AREAS. IN SPITE OF THEIR GOOD FAITH EFFORTS, WE HAVE NOT RECEIVED DRAFT SHELTER UTILIZATION PLANS FROM TWO EPZ COMMUNITIES, AND WE CANNOT ASSESS THE ADEQUACY OF THE EMERGENCY RESPONSE SYSTEM UNTIL ALL SHELTER PLANS HAVE BEEN REVIEWED.

I HAVE INVITED MR. DAVID QUAID TO PRESENT SOME PHOTOGRAPHS OF THE EPZ AREA IN WHICH HE OWNS A HOME, THE SAQUISH NECK SECTION OF THE TOWN OF PLYMOUTH. THIS REMOTE AREA IS JUST THREE MILES FROM PILGRIM STATION. SAQUISH LIES AT THE END OF A

PETER W. AGNES, JR.

DECEMBER 9, 1988

THREE MILE PENINSULA SERVED BY A ROAD WHICH IS DIFFICULT TO TRAVERSE UNDER THE BEST CONDITIONS WHEN IT IS PASSABLE ONLY IN FOUR WHEEL DRIVE VEHICLES, AND VIRTUALLY IMPASSABLE IN BAD WEATHER AND DURING PEAK TIDES. A NUMBER OF PEOPLE SUCH AS MR. QUAID OWN WINTERIZED HOMES AND RESIDE IN SAQUISH FULL-TIME OR PART-TIME YEAR AROUND. THE SUMMER POPULATION CAN SWELL TO MORE THAN 4,000. WHETHER THE RECOMMENDED PROTECTIVE ACTION IS SHELTER IN PLACE OR EVACUATION, THE SAQUISH AREA IS THE PORTION OF THE EPZ IN WHICH WE WOULD HAVE THE GREATEST DIFFICULTY PROTECTING RESIDENTS AND VISITORS, REGARDLESS OF WEATHER, TIDES, OR THE TIME OF DAY OR YEAR. AS OF THIS MOMENT WE SIMPLY HAVE NOT CONCLUDED ARRANGEMENTS FOR PROTECTION OF THE SAQUISH POPULATION.

THESE ARE JUST BRIEF DISCUSSIONS OF SOME OF THE VERY SERIOUS EMERGENCY RESPONSE PROGRAM DEFFICIENCIES WHICH PERSIST TODAY. I URGE THAT YOU READ CAREFULLY SECRETARY BARRY'S OCTOBER, 1988 REPORT TO THE GOVERNOR WHICH ELABORATES ON THESE AND OTHER UNRESOLVED EMERGENCY PLANNING ISSUES. I BELIEVE THAT ANY OBJECTIVE ANALYSIS OF THE STATUS OF EMERGENCY PLANNING IN THE PILGRIM EPZ LEADS TO THE INEVITABLE CONCLUSION THAT THE BEST AND CONCERTED EFFORTS OF STATE GOVERNMENT, LOCAL GOVERNMENT, AND THE LICENSEE HAVE NOT YET PRODUCED THE BEST POSSIBLE EMERGENCY RESPONSE PLANS FOR THE PILGRIM EPZ.

MANAGEMENT AND PERSONNEL ERROR CONCERNS

IN ADDITION TO THE FACT THAT EMERGENCY PLANS FOR RESPONSE TO AN ACCIDENT AT PILGRIM ARE INCOMPLETE, WE REMAIN CONCERNED

OVER BOSTON EDISON'S OBVIOUS DIFFICULTY IN MANAGING PILGRIM STATION. THIS MANAGEMENT FAILURE IS AMPLY DEMONSTRATED BY PILGRIM STATION'S CONTINUING PLAGUE OF SERIOUS PERSONNEL ERRORS. THE MASSACHUSETTS CIVIL DEFENSE AGENCY AND OFFICE OF EMERGENCY PREPAREDNESS RECEIVES COPIES OF ALL 50.72(C) REPORTS MADE TO THE NRC BY PILGRIM STATION, YANKEE STATION, AND VERMONT YANKEE STATION. AN ANALYSIS OF THESE REPORTS FOR THE PAST TWELVE MONTHS IS QUITE REVEALING.

FROM OCTOBER, 1987, THROUGH NOVEMBER, 1988, YANKEE STATION FILED ONLY TWO 50.72(C) REPORTS, AND FOR THE SAME PERIOD, VERMONT YANKEE FILED 41 REPORTS. PILGRIM STATION FILED THIRTY-EIGHT 50.72(C) REPORTS, IN SPITE OF THE FACT THAT PILGRIM IS IN COLD SHUTDOWN WHILE YANKEE AND VERMONT YANKEE HAVE BEEN IN FULL OPERATION. FURTHER, BOTH YANKEE INCIDENTS WERE THE RESULT OF MECHANICAL FAILURE WHILE 30 VERMONT YANKEE REPORTS -- 73% -- WERE THE RESULT OF MECHANICAL FAILURE AND ONLY 8 -- 20% -- WERE THE RESULT OF VERMONT YANKEE PERSONNEL ERROR. ON THE OTHER HAND, AT PILGRIM STATION, 23 -- 60% -- OF THE 50.72(C) EVENTS WERE THE RESULT OF PERSONNEL ERROR. THUS, ON A PERCENTAGE BASIS, PILGRIM STATION HAS THREE TIMES THE RATE OF PERSONNEL ERRORS RESULTING IN REPORTABLE EVENTS THAN VERMONT YANKEE, EVEN THOUGH THEY ARE THE SAME GE MARK 1 CONFIGURATION AND EVEN THOUGH VERMONT YANKEE IS IN FULL OPERATION AND PILGRIM STATION IS IN COLD SHUTDOWN. OUR ANALYSIS DOES NOT INCLUDE AN INCIDENT WHICH OCCURRED ON NOVEMBER 30, 1988 IN WHICH PILGRIM WORKERS ALLOWED MORE THAN 2000 GALLONS OF CONTAMINATED WATER TO BE SPILLED WITH MORE THAN 100 GALLONS

PETER W. AGNES, JR.

DECEMBER 9, 1988

ESCAPING TO THE ENVIRONMENT ON-SITE.

THIS DOES NOT SPEAK WELL AT ALL OF BOSTON EDISON'S ABILITY TO MANAGE ITS PERSONNEL'S OPERATION OF PILGRIM STATION. WE CONSIDER THIS CONSTANT STREAM OF PERSONNEL ERRORS -- SOME OF WHICH ARE VERY SERIOUS, INDEED -- TO BE EVIDENCE OF INADEQUATE MANAGEMENT, ESPECIALLY WHEN CONSIDERED IN LIGHT OF THE MEDIOCRE TO POOR SCORES WHICH PILGRIM RECEIVED IN THEIR LAST SALP REPORT. WE HAVE BEEN TREATED TO A NEVER ENDING HOSANNAH ABOUT HOW MANAGEMENT OF PILGRIM HAS BEEN TURNED AROUND, YET THE PERPONDERANCE EVIDENCE OTHER THAN THE RESUMES OF THE NEW MANAGEMENT TEAM WOULD INDICATE OTHERWISE. WE DO NOT BELIEVE THAT PILGRIM STATION SHOULD BE PERMITTED TO RESTART UNTIL DOCUMENTARY EVIDENCE HAS BEEN PRODUCED, SUCH AS A SALP REPORT WITH SIGNIFICANTLY IMPROVED GRADES, THAT NUCLEAR MANAGEMENT AT PILGRIM STATION HAS GENUINELY IMPROVED.

NEED FOR A GRADED EXERCISE

SECRETARY BARRY'S OCTOBER, 1988 REPORT TO THE GOVERNOR DISCUSSES THE DEGREE TO WHICH PILGRIM AREA EMERGENCY RESPONSE PLANS, FACILITIES AND PERSONNEL ARE NEW. WE BELIEVE THAT SO MANY VAST CHANGES AND ENHANCEMENTS HAVE BEEN MADE TO EMERGENCY RESPONSE PLANS AND CAPABILITIES SINCE THE LAST EXERCISE WAS HELD IN SEPTEMBER OF 1985 THAT THE PRESENT EMERGENCY PREPAREDNESS SITUATION RESEMBLES THAT OF A NEW LICENSE. FOR THIS REASON ALONE, PILGRIM STATION SHOULD NOT BE PERMITTED TO RESTART UNTIL A SUCCESFULL FULL-SCALE EXERCISE OF ALL PLANS, FACILITIES, AND

PETER W. AGNES, JR.

DECEMBER 9, 1988

PERSONNEL HAS BEEN HELD WHICH DEMONSTRATES ALL FEMA EXERCISE OBJECTIVES.

THE NRC STAFF ALLEGES THAT THE COMMONWEALTH OF MASSACHUSETTS' HAVING HELD EXERCISES FOR OTHER NUCLEAR POWER PLANT EPZ'S IS EVIDENCE OF SOUND PREPAREDNESS TO RESPOND TO AN ACCIDENT AT PILGRIM. THIS ARGUMENT IS PATENTLY ABSURD. AN EMERGENCY EXERCISE FOR ONE SITE INDICATES ABSOLUTELY NOTHING ABOUT EMERGENCY RESPONSE CAPABILITIES IN OTHER EPZ'S. THE MASSACHUSETTS RESPONSE SYSTEM IS DESIGNED SUCH THAT FIRST RESPONSIBILITY FOR PUBLIC SAFETY RESIDES WITH LOCAL AUTHORITIES, AND THERE HAS BEEN NO DEMONSTRATION OF LOCAL CAPABILITIES IN THE PILGRIM EPZ COMMUNITIES FOR MORE THAN THREE YEARS. DR. MURLEY OF THE NRC MOREOVER HAS ASSERTED THAT PLANS FOR RESPONSE TO AN ACCIDENT AT PILGRIM STATION ARE BETTER THAN EVER. I SIMPLY CANNOT IMAGINE HOW SUCH A STATEMENT CAN BE MADE IN THE ABSENCE OF A MEANINGFUL TEST OF THE PLANS.

IT IS THE POSITION OF THE COMMONWEALTH THAT A FULL-SCALE GRADED EXERCISE MUST PRECEED ANY MOTION TO RESTART PILGRIM STATION, BUT THAT AN EXERCISE SHOULD NOT BE HELD UNTIL WE HAVE PLANS TO TEST WHICH HAVE BEEN APPROVED BY ELECTED OFFICIALS IN EACH EPZ AND HOST COMMUNITY. THE FACT IS THAT, TO DATE, NOT ONE OF THE SEVEN EPZ AND HOST COMMUNITIES HAS INDICATED TO ME THAT THEIR PLANS ARE SUFFICIENTLY COMPLETE THAT THEY SHOULD BE SUBJECTED TO A FULL-SCALE EXERCISE.

CONCLUSIONS

LET ME REITERATE THAT THE COMMONWEALTH OF MASSACHUSETTS IS NOT OPPOSED CATEGORICALLY TO THE OPERATION OF PILGRIM NUCLEAR POWER STATION. HOWEVER, WE CONSIDER OUR RESPONSIBILITY TO PROTECT PUBLIC SAFETY TO BE A SOLEMN OBLIGATION, AND I SIMPLY CANNOT TELL YOU TODAY THAT EMERGENCY PREPAREDNESS HAS REACHED THE POINT WHERE I CAN ASSURE THE PEOPLE I SERVE -- AND YOU THE COMMISSIONERS -- THAT PUBLIC SAFETY CAN BE ADEQUATELY PROTECTED SHOULD THERE BE AN ACCIDENT AT PILGRIM NUCLEAR POWER STATION.

THE AGENCIES OF THE COMMONWEALTH OF MASSACHUSETTS AND THE PILGRIM EPZ AND HOST COMMUNITIES HAVE EXPENDED AN ENORMOUS EFFORT TOWARDS DEVELOPING THE BEST POSSIBLE EMERGENCY RESPONSE SYSTEM, AND WE ARE GRATEFUL FOR BOSTON EDISON'S SUPPORT FOR OUR EFFORTS. WE ARE ALL PROUD -- I BELIEVE JUSTIFIABLY PROUD -- OF THE PROGRESS WE HAVE MADE IN EMERGENCY PREPAREDNESS, BUT LET ME SAY ONCE AGAIN THAT PROGRESS DOES NOT SAVE LIVES.

WE ARE DOING EVERYTHING WITHIN OUR ABILITIES TO DEVELOP ADEQUATE EMERGENCY RESPONSE PLANS, AND WE INSIST THAT THE NUCLEAR REGULATORY COMMISSION DOES EVERYTHING WITHIN ITS POWER TO ASSURE THAT PILGRIM STATION IS OPERATED SAFELY.

IT WOULD BE IRRESPONSIBLE FOR THE NUCLEAR REGULATORY COMMISSIONERS TO AUTHORIZE THE RESTART OF PILGRIM NUCLEAR POWER STATION UNTIL THE FOLLOWING CONDITIONS ARE MET:

1. THAT EACH EMERGENCY PLANNING ZONE AND HOST COMMUNITY HAS IN PLACE AN EMERGENCY PLAN WHICH MEETS ALL REGULATORY REQUIREMENTS AND WHICH HAS THE FAITH AND ENDORSEMENT OF LOCAL

PETER W. AGNES, JR.

DECEMBER 9, 1988

OFFICIALS,

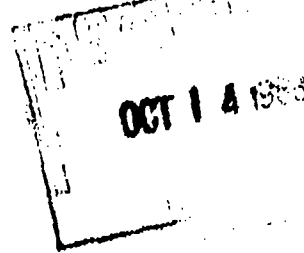
2. THERE HAS BEEN A SUCCESSFUL FULL-SCALE, GRADED EXERCISE OF ALL EMERGENCY PLANS, FACILITIES, AND PERSONNEL FOR THE PILGRIM AREA, AND
3. COMPELLING DOCUMENTARY EVIDENCE IS PRODUCED THAT BOSTON EDISON CAN MANAGE PILGRIM STATION IN A SAFE AND RESPONSIBLE MANNER.

THANK YOU. I WILL BE HAPPY TO RESPOND TO ANY QUESTIONS OR OBSERVATIONS YOU MAY WISH TO OFFER.



Federal Emergency Management Agency

Region I J.W. McCormack Post Office and Court House
Boston, Massachusetts 02109



OCT 13 1988

Charles V. Barry, Secretary
Executive Office of Public Safety
Commonwealth of Massachusetts
One Ashburton Place
Boston, Massachusetts 02108

Dear Mr. Barry:

This is an interim response to your letter of September 6, 1988, and September 29, 1988, in which you responded to my August 22, 1988, letter concerning radiological emergency planning and preparedness for the Pilgrim Nuclear Power Plant. Your letters did not arrive in our office until September 16, 1988 and October 7, 1988, respectively.

Subsequent to receiving your September 6, 1988, letter, Mr. Robert J. Boulay, Director, Massachusetts Civil Defense Agency and Office of Emergency Preparedness, submitted copies of the initial Draft Radiological Emergency Response Plan for the Town of Marshfield, Massachusetts; copies of a revision to the Draft Radiological Emergency Response Plan for the City of Taunton, Massachusetts; copies of a revision to the Draft Radiological Emergency Response Plan for Town of Bridgewater, Massachusetts; and copies of the MCDA Area II Draft Radiological Emergency Response Plan for review. In addition, we just recently received a draft copy of the latest comprehensive report to Governor Dukakis on radiological emergency planning and preparedness at the Pilgrim Nuclear Power Plant.

Before we fully respond to your September 6 and 29, 1988, letters, we would like an opportunity to carefully study and review the report to the Governor and the latest draft planning documents that have been submitted for review. Hopefully the comprehensive report to Governor Dukakis will address the exact status of the Pilgrim planning effort and include projected completion dates or milestones for completing the planning not yet accomplished.

Please contact me at 223-9540 in Boston if you have any questions.

Sincerely,

for Henry G. Vickers
Regional Director



Michael S. Dukakis
Governor

Charles V. Barry
Secretary

The Commonwealth of Massachusetts
Executive Office of Public Safety
One Ashburton Place
Boston, Massachusetts 02108

November 18, 1988

Mr. Julius W. Becton, Jr., Director
Federal Emergency Management Agency
500 C. Street, Southwest
Washington, D.C. 20472

Dear Mr. Becton:

I am writing in an effort to clarify a matter we have brought to the attention of the NRC staff with regard to emergency planning for the Pilgrim Nuclear Power Plant.

I have enclosed an excerpt from a transcript of a meeting with NRC Staff, including Dr. Thomas Murley, Director of N.R.R., in Rockville, Maryland on October 5, 1988 (Transcript pp. 84-92). On page 89, Dr. Murley observed that with respect to offsite emergency planning, "Pilgrim is not a particularly difficult site. In fact, it does not even make the top ten difficult sites in the United States in terms of emergency planning." Later in the proceeding, Assistant Secretary Peter Agnes asked whether there was any other licensed commercial nuclear power plant in the nation where the state had declared offsite emergency plans inadequate and where FEMA too had withdrawn interim approval of such plans (Transcript pp. 90). Dr. Murley responded by claiming that Mr. Agnes was mistaken (transcript p. 90).

This issue also was brought up by several of the speakers at the full NRC Commission meeting in Rockville, Maryland on October 14, 1988. I have enclosed a complete copy of that transcript for your review.

My question is can you identify a fully licensed and operating commercial nuclear power plant in the United States where state and local government have declared offsite emergency response plans to be inadequate, and where FEMA has declared that "offsite radiological emergency response planning and preparedness are inadequate to protect the public health and safety in the event of an accident" and also declared that its previous interim finding of adequacy "no longer applies," as FEMA did in the case of Pilgrim? See enclosed memorandum of Richard W. Krimm dated 8/6/87.

Julius W. Becton, Jr.
November 18, 1988
Page Two

We also would appreciate it if you could tell us whether FEMA has a timetable for reevaluating its interim finding of August, 1987 regarding Pilgrim?

Sincerely,

Charles V. Barry
Secretary of Public Safety

CVB/cas



Michael S. Dukakis
Governor

Charles V. Barry
Secretary

The Commonwealth of Massachusetts
Executive Office of Public Safety
One Ashburton Place
Boston, Massachusetts 02108

September 6, 1988

Mr. Henry G. Vickers, Regional Administrator
Federal Emergency Management Agency
Region I
442 J.W. McCormack Post Office and Court House
Boston, MA 02109

Dear Mr. Vickers:

I am in receipt of your letter dated August 22, 1988, in response to my letters of May 27 and July 7, 1988, about the evaluation criteria employed by F.E.M.A. in reviewing Radiological Emergency Response Plans for Pilgrim Station.

Your observation that there is a great deal of work to be done to complete the development of these plans, prior to an assessment regarding their adequacy, is correct. I am currently in the process of preparing a comprehensive report for the Governor on all aspects of emergency preparedness for an accident at Pilgrim Station. My report will spell out in detail the status of the issues referred to in your letter, as well as others, and what remains to be done to complete preparation of a draft plan for state and local government.

In response to your request for a work plan and a specification of deadlines for completing work on offsite planning for Pilgrim Station, I repeat what we have said time and again. The Commonwealth, along with local governments and the licensee, is following a planning process established after our December, 1986 report to the Governor. It is unfortunate that F.E.M.A. has been unable to attend any of the numerous planning sessions and conferences that the Commonwealth has hosted over the past several years.

It is our strong conviction, however, that even if a completed plan appears to meet the applicable federal standards, a determination of adequacy cannot be made unless and until it has been tested by a full scale offsite exercise. Such a requirement is particularly appropriate and necessary in this case because there has been no such exercise for three years and a completed plan would constitute not a revision to an earlier plan, but rather a completely new plan, based upon a new approach, with new procedures designed for a large number of new emergency personnel schooled under an entirely new training regimen.

Henry G. Vickers
September 6, 1988
Page Two

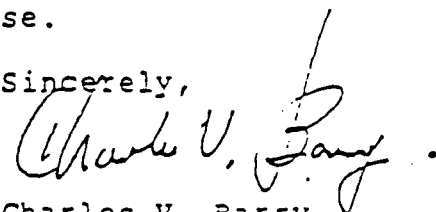
The Commonwealth believes strongly that Pilgrim should not be permitted to restart without an approved offsite plan that has withstood the rigors of a full scale, graded exercise. There is great concern among local residents and officials, which we at the state level share, regarding the lack of reasonable assurance that the public health and safety can be protected in the absence of a completed, tested and approved emergency plan. We, therefore, urge F.E.M.A. to withhold any restoration of interim approval to offsite plans until the new Pilgrim plans have been finally completed and approved by local and state government and tested by a full scale, graded exercise.

To date, neither N.R.C. Region I Administrator William Russell nor N.R.R. Director Dr. Thomas Murley have been willing to state with precision what in their opinion must be demonstrated to resolve the N.R.C.'s concerns about the offsite emergency preparedness problems. For example, they have not stated whether approved plans and implementing procedures (particularly for the special needs populations), the emergency worker training program, letters of agreement, three fully equipped and operational reception centers, the procurement of radiological monitoring and communications equipment, a new EPI publication, and transportation resources all must be in place before restart or whether some, but not all, of the above must be demonstrated before restart. Neither have Regional Administrator Russell nor Director Murley stated whether a graded, full scale exercise must take place before restart.

Instead, we have been advised by N.R.C. staff that these are matters for F.E.M.A. to address in the first instance. Since we are advised that the full N.R.C. is scheduled to take up the matter of the Pilgrim restart on October 14, 1988, we believe it is time for F.E.M.A. and the N.R.C. staff to provide us with answers to these questions.

I look forward to a prompt response.

Sincerely,



Charles V. Barry
Secretary of Public Safety

CVB/cas

cc: Dr. Thomas Murley, Director, N.R.R.
Mr. William T. Russell, Region I Administrator

WORKING GROUP MEETING

From: March 17, 1987
To: December 8, 1987

Total Meetings Held - 77
(See attached attendance reports)

SPECIAL MEETINGS

Total Meetings Held - 21
(See attached attendance reports)

MEETINGS OTHER THAN WORKING GROUP

Total Meetings Held - 148
(See attached attendance reports)

1987 - Meetings attended other than Working Group:

March 31, 1987	- Kingston RERP Committee meeting at Kingston.
April 1, 1987	- Taunton RERP Committee meeting at Taunton.
April 6, 1987	- Kingston RERP Committee meeting at Kingston.
April 7, 1987	- Bourne Selectmen regarding expansion of EPZ.
April 13, 1987	- Kingston RERP Committee meeting.
April 13, 1987	- Plympton Selectmen's meeting regarding EPZ expansion.
April 14, 1987	- Plymouth County and Civil Defense Director regarding ETE at Plymouth.
April 16, 1987	- Taunton Red Cross at Taunton.
April 16, 1987	- Marshfield RERP at Marshfield.
April 21, 1987	- Duxbury RERP Committee meeting at Duxbury.
April 27, 1987	- MDPW meeting regarding RERP.
April 28, 1987	- Wareham Civil Defense Director regarding expansion of EPZ.
April 29, 1987	- Bridgewater RERP Committee meeting at Bridgewater.
May 5, 1987	- Carver Superintendent of Schools regarding RERP at Carver.
May 8, 1987	- Carver Superintendent of Schools regarding RERP at Carver.
May 12, 1987	- Plymouth RERP Committee meeting at Plymouth.
May 15, 1987	- Red Cross RERP Committee meeting at Brockton.
May 20, 1987	- Bridgewater RERP Committee meeting at Bridgewater.
May 21, 1987	- Marshfield RERP Committee meeting at Marshfield.
May 26, 1987	- Kingston RERP Committee meeting at Kingston.
May 27, 1987	- NRC, SALP at Plymouth.
May 29, 1987	- Kingston Selectmen's meeting regarding RERP.

June 11, 1987	- Plympton RERP meeting regarding expansion of EPZ.
June 23, 1987	- EPI meeting in Plymouth.
June 29, 1987	- Handicapped Affairs meeting in Plymouth.
July 2, 1987	- MCDA training officer regarding RERP training.
July 7, 1987	- Plymouth RERP Committee meeting at Plymouth Town Hall.
July 9, 1987	- Duxbury RERP Committee meeting at Duxbury.
July 13, 1987	- Weymouth Selectmen's meeting regarding reception center to north.
July 14, 1987	- NRC and MCDA meeting regarding expansion of EPZ.
July 22, 1987	- Plymouth RERP Committee meeting at Plymouth for all EPZ and host civil defense directors.
July 28, 1987	- MCDA RERP meeting with MCDA at Framingham.
July 28, 1987	- Carver Selectmen's meeting regarding RERP at Carver.
July 29, 1987	- Carver Civil Defense Director regarding RERP at Carver.
August 5, 1987	- Kingston Civil Defense Director regarding RERP at Kingston.
August 10, 1987	- Bridgewater Civil Defense Director regarding RERP.
August 11, 1987	- Bourne Selectmen, Police, Fire, Civil Defense Director regarding RERP.
August 12, 1987	- Plymouth RERP at Plymouth.
August 13, 1987	- Marshfield RERP at Marshfield.
August 25, 1987	- Carver Selectmen and Civil Defense Director regarding RERP.
August 31, 1987	- Duxbury Selectmen's meeting regarding RERP.

Page 5

- | | |
|--------------------|---|
| September 1, 1987 | - Kingston Selectmen's meeting regarding RERP. |
| September 2, 1987 | - Plymouth RERP meeting at Plymouth. |
| September 8, 1987 | - Attended training meeting at EDF. |
| September 8, 1987 | - Bridgewater Selectmen's meeting regarding RERP. |
| September 10, 1987 | - Bridgewater RERP Committee meeting at Bridgewater. |
| September 14, 1987 | - Plymouth RERP Committee meeting at Plymouth. |
| September 15, 1987 | - Taunton Council meeting on RERP. |
| September 16, 1987 | - Marshfield RERP Committee meeting at Marshfield. |
| September 21, 1987 | - Taunton RERP Committee meeting at Taunton. |
| September 23, 1987 | - Bridgewater RERP Committee meeting at Bridgewater. |
| September 23, 1987 | - Carver Handicapped meeting with Civil Defense Director. |
| September 23, 1987 | - Marshfield RERP Committee meeting at Marshfield. |
| September 28, 1987 | - Carver RERP Committee meeting at Carver. |
| September 30, 1987 | - Plymouth RERP Committee meeting at Plymouth. |
| October 5, 1987 | - Carver RERP Committee meeting at Wareham. |
| October 7, 1987 | - Bridgewater RERP Committee meeting at Bridgewater. |
| October 13, 1987 | - MCDA training officer regarding training program. |
| October 20, 1987 | - MCDA training meeting at Framingham. |
| October 21, 1987 | - Kingston RERP Committee meeting at Kingston. |
| October 21, 1987 | - Plymouth RERP Committee meeting at Plymouth. |
| October 26, 1987 | - Bridgewater RERP Committee meeting at Bridgewater. |
| October 29, 1987 | - C-Med meeting in Hanson regarding ambulances. |

Page 4

- | | |
|-------------------|--|
| October 29, 1987 | - EPI meeting at Bridgewater. |
| November 2, 1987 | - Bridgewater Selectmen's meeting regarding RERP. |
| November 9, 1987 | - Bridgewater RERP Committee meeting at Bridgewater. |
| November 18, 1987 | EO144 meeting on RERP at Framingham. |
| December 7, 1987 | - Transportation meeting in preparation for visits to the bus companies. |
| December 8, 1987 | - Training meeting at Plymouth EOC. |
| December 9, 1987 | - Marshfield RERP at Marshfield. |
| December 10, 1987 | - Kingston training at EOC. |
| December 10, 1987 | - Transportation meeting regarding bus providers. |
| December 14, 1987 | - Notification meeting at MCDA. |
| December 16, 1987 | - Transportation with bus providers. |
| December 18, 1987 | - Transportation with bus providers. |
| December 22, 1987 | - ETE meeting with State Police. |

1988 - Meetings attended other than Working Group:

Page 5

January 5, 1988 - Met with three transportation providers.

January 6, 1988 - ETE meeting with Edaville Railroad.

January 6, 1988 - Plymouth RERP Committee meeting at Plymouth.

January 7, 1988 - Taunton RERP Committee meeting at Taunton.

January 7, 1988 - Met with Brewster Ambulance regarding transportation.

January 12, 1988 - Carver Civil Defense Director regarding training at Carver.

January 13, 1988 - Marshfield RERP Committee meeting at Marshfield.

January 20, 1988 - Carver training meeting at Area II.

January 20, 1988 - Marshfield training meeting at Marshfield.

January 22, 1988 - Plymouth County training meeting at Plymouth.

January 27, 1988 - Coast Guard coordination meeting at Plymouth.

February 1, 1988 - Red Cross meeting at Framingham.

February 2, 1988 - Carver RERP meeting with Edaville Railroad.

February 2, 1988 - Carver Selectmen's meeting regarding RERP.

February 2, 1988 - Plymouth MCI RERP meeting.

February 8, 1988 - Attended RERP meeting Area II plan.

February 10, 1988 - Taunton State Hospital regarding RERP reception center.

February 11, 1988 - Bridgewater State College regarding RERP reception center.

February 11, 1988 - MDPW regarding staging areas.

February 24, 1988 - Plymouth RERP Committee meeting at Plymouth.

February 29, 1988 - Bridgewater Executive Secretary regarding RERP.

March 1, 1988 - Plymouth Civil Defense Director regarding training for RERP.

March 9, 1988 - Duxbury RERP Committee meeting at Duxbury.

1988 Meetings attended other than Working Group: (cont.)

Page 6

March 14, 1988	- Marshfield RERP Committee and Board of Health at Marshfield.
March 16, 1988	- RERP meeting in Framingham.
March 23, 1988	- Plymouth RERP Committee meeting at Plymouth.
March 24, 1988	- ETE meeting at Plymouth.
March 28, 1988	- Handicapped Affairs meeting in Plymouth.
March 31, 1988	- Wellesley DPW regarding third reception center.
March 31, 1988	- Notification meeting at Framingham.
April 6, 1988	- Bridgewater training meeting regarding RERP.
May 12, 1988	- MDPW regarding Sagamore staging area.
May 16, 1988	- MDPW District 7 regarding "Park and Ride" staging area.
May 23, 1988	- Myles Standish State Forest training meeting regarding RERP.
June 1, 1988	- Wellesley DPW regarding facility.
June 7, 1988	- Plymouth County C-Med committee regarding RERP.
June 10, 1988	- MDMH training meeting at Framingham.
June 15, 1988	- Plymouth RERP Committee meeting at Plymouth.
July 8, 1988	- MDPW training meeting at Plymouth.
July 27, 1988	- MDPW District 7 Middleboro RERP training.
August 9, 1988	- Kingston RERP at Kingston.
August 10, 1988	- Red Cross regarding RERP at Framingham.
August 24, 1988	- NSEPP Bridgewater meeting with local communities and Peter Agnes.
August 31, 1988	- Duxbury - Men's Club, BECo, CURE.
September 15, 1988	- Duxbury RERP Committee and Peter Agnes.
September 19, 1988	- Kingston School Committee, Civil Defense Director Tavares, Deputy Director Woodworth.

1988 - Meetings attended other than Working Group: (cont.) Page 7

September 27, 1988 - Plymouth - Local and regional school committees.

September 28, 1988 - Duxbury school.

October 1, 1988 - Kingston EOC open house.

October 4, 1988 - Plymouth - Local and regional school committees, Civil Defense Director Hadfield.

October 6, 1988 - Duxbury, Peter Agnes, CURE, Plymouth, Marshfield, Cape Cod, MDPH, MCDA, MA Asst. Attorney General.

October 15, 1988 - Plymouth EOC open house.

October 24, 1988 - Plymouth school shelter, school committees, BECo, MCDA, Plymouth Civil Defense Director.

October 25, 1988 - Plymouth school committees (elementary and regional) for vote.

August 30, 1988 - M.C. meeting on equipment at Area II.

August 31, 1988 - Kingston RERP Committee meeting at Kingston.

August 31, 1988 - Marshfield RERP Committee meeting at Marshfield.

September 1, 1988 - Carver RERP Committee meeting at Carver.

September 15, 1988 - Duxbury RERP Committee meeting at Duxbury.

September 21, 1988 - Marshfield RERP Committee meeting at Marshfield.

September 28, 1988 - Plymouth RERP Committee meeting at Plymouth.

October 6, 1988 - Duxbury and EP2 Superintendent of Schools at Duxbury.

October 26, 1988 - NRC visit to Duxbury, Taunton, Kingston.

October 27, 1988 - NRC visit to Carver.

October 31, 1988 - Plymouth South High School, joint school committee meeting regarding RERP.

November 2, 1988 - NRC visit to Bridgewater.

November 8, 1988 - Coast Guard training meeting regarding RERP.

1988 - Meetings attended other than Working Group: (cont.)

- November 10, 1988 - Plymouth RERP Committee meeting at Plymouth.
- November 17, 1988 - Duxbury School Committee meeting regarding RERP.
- November 17, 1988 - Duxbury schools, PTA, Civil Defense Director, Principals, Superintendent.
- November 22, 1988 - Plymouth Civil Defense Director Hadfield and regional school officials.

ATTENDANCE REPORT

DATE	BRIDGEWATER	CARVER	DUXBURY	KINGSTON	MARSHFIELD	PLYMOUTH	TAUNTON	MCDA	MDPE
1987									
March 17		X	X		X	X	X		X
March 17	X	X	X		X	X	X		X
April 3		X	X		X	X	X		X
April 17		X	X		X	X	X		X
April 24		X	X		X	X	X		X
May 1		X	X		X		X		X
May 15		X	X		X	X	X		X
May 22		X	X		X	X	X		X
May 29		X	X		X	X	X		X
June 5		X	X		X	X	X		X
June 12		X	X		X	X	X		X
June 19		X	X		X	X	X		X
June 26		X	X		X	X	X		X
July 7		X	X		X		X		X
July 10		X	X		X	X	X		X
July 24		X	X		X	X	X		X
July 31		X	X		X	X	X		X
Aug 7		X	X		X	X	X		X

1

DATE	BRIDGEWATER	CARVER	DUXBURY	KINGSTON	MARSHFIELD	PLYMOUTH	TAUNTON	MCDA	MDPH	BF
1987										
March 10		X	X		X	X	X			X
March 17	X	X	X		X	X	X			X
April 3		X	X		X	X	X			X
April 17		X	X		X	X	X			X
April 24		X	X		X	X	X			X
May 1		X	X		X		X			X
May 15		X	X		X	X	X			X
May 22		X	X		X	X	X			X
May 29		X	X		X	X	X			X
June 5		X	X		X	X	X			X
June 12		X	X		X	X	X			X
June 17		X	X		X	X	X			X
June 26		X	X		X	X	X			X
July 7		X	X		X		X			X
July 10		X	X		X	X	X			X
July 24		X	X		X	X	X			X
July 31		X	X		X	X	X			X
Aug 7		X	X		X	X	X			X

FILE NO. 100-368877-1000

[illegible]

1987 - Special Meetings (other than Working Group
with all EPI and Host communities present)

Page 5

- April 10, 1987 - Office of Handicapped Affairs and local office regarding survey.
- April 14, 1987 - MCDA, Plymouth County and CDDs from each of the 7 communities regarding ETE.
- April 22, 1987 - Meeting for all CDDs with MCDA in Plymouth.
- June 29, 1987 - Handicapped Affairs meeting in Plymouth.
- June 29, 1987 - EPI meeting in Plymouth.
- July 16, 1987 - Office of Handicapped Affairs at Plymouth regarding RERP.
- July 22, 1987 - All CDD and Staff with Secretary Barry, Secretary Pollard and MCDA at Plymouth Town Hall regarding RERP .
- October 29, 1987 - Duxbury High School, State, Local, Federal meeting regarding RERP. Called for by Selectmen in Duxbury.
- November 6, 1987 - Special Working Group meeting with Mr. Agnes, Selectmen, Senators, Representatives and CDDs regarding progress report.
- December 3, 1987 - Handicapped Affairs meeting in Plymouth.
- December 16, 1987 - Harbor Master, Coast Guard and Civil Defense Director coordination meeting.

1988 - Special Meetings (other than Working Group
With all EPZ and Host communities present)

Page 10

- January 7, 1988 - Senate Hearings held in Plymouth by Senator Kennedy.
- January 12, 1988 - Handicapped Affairs meeting at Secretary of Public Safety's office, Boston.
- May 11, 1988 - NRC meeting in Plymouth.
- June 16, 1988 - Public Safety meeting, Plymouth Town Hall with Peter Agnes.
- August 4, 1988 - Public Safety meeting at Plymouth Town Hall regarding participation in the augmented team inspection, 3:30 meeting, public officials.
- August 4, 1988 - Public Safety meeting at Plymouth Town Hall for general public.
- August 25, 1988 - NRC meeting, Sheridan Hotel, Plymouth.
- August 26, 1988 - NRC sub committee meeting at Memorial Hall, Plymouth with P. Agnes, BECo, MA Citizens for Safe Energy.
- September 29, 1988 - Plymouth - NRC Region 1 (W. Russell), Peter Agnes, Kingston, Duxbury, CURE.
- October 6, 1988 - Duxbury - School Superintendent, MCDA, Duxbury-Plymouth, Marshfield, Silver Lake Schools.

PLYMOUTH

Implementing Procedures:

<u>IP_No.</u>	<u>(Note)</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
75			Pinewood Camp		J
76	(2)		Camp Bournedale		J
77	(2)		Baird Center		J
78	(2)		Wind in the Pines		J
79			Plymouth Jail		J
80	(1)	03-10-88	Shelter Manager	0	
	(1)		New Testament		
	(1)		Pilgrim Manor Day Care		
	(2)(3)		Plymouth Discovery Center		
	(2)(5)		Sequish		

NOTES: As of 12-02-88

- (1) Approved "in concept" by Selectmen.
- (2) Awaiting approval "in concept" by Selectmen.
- (3) Approved by RERP Committee.
- (4) Awaiting approval by RERP Committee.
- (5) Awaiting approval by agency head.

Lesson Plans:

<u>No.</u>	<u>Title</u>	<u>Date</u>
3-1P	Intro to the EOP	07-26-88
3-2P	Communications Officer	03-16-88
3-3P	RACES/ARES	04-29-88
3-4P	Overview of Message Control	05-01-88
3-5P	Board of Selectmen	04-29-88

PLYMOUTH

<u>No.</u>	<u>Title</u>	<u>Date</u>
3-6P	Radiological Officer	04-29-88
3-7P	Special Needs	04-29-88
5-1P	Intro to Police Dept.	07-21-88
5-2P	Police Services Officer	10-25-88
5-3P	Shift Commander	10-25-88
5-4P	Patrol Supervisor	10-25-88
5-5P	Police Dispatcher	10-25-88
5-6P	EOC Security Officer	10-25-88
5-7P	Security Officer Memorial Hall	10-25-88
5-8P	EOC Initial Monitor	10-25-88
5-9P	Police EOC Radio Operator	10-25-88
6-1P	Intro to Civil Defense	05-16-88
6-2P	Civil Defense Director	06-16-88
6-3P	Operations Officer	05-16-88
7-1P	Intro to DPW	09-20-88
7-2P	Public Works Officer & Highway Supervisor	09-20-88
7-3P	Route Alerting	09-20-88
7-4P	Dosimetry Coordinator	09-20-88
8-1P	Harbor Master	10-28-88
9-1P	Overview of EMS	08-01-88
12-6P	Intro to Transportation	07-22-88
12-7P	Transportation Officer	07-15-88
12-9P	Staging Area Managers	07-15-88

PLYMOUTH

No.	Title	Date
12-9P	Transportation Dosimetry Coordinator	07-14-88
12-10P	Vehicle Dispatcher	07-15-88
19-1P	Intro to Board of Health	07-06-88
21-1P	Shelter Officer	03-16-88

Community: PLYMOUTH

Date entered: 12-02-88

RERP 10-30-87 Rev. 6 Received 10-30-87

Cross Reference Rev. Received

Corrective Action Response

Implementing Procedures: None forwarded to MCDA as of 12-02-88.

IP_No.	(Note)	Date	Procedure Title	Draft_No.	RERP Part Implemented
01	(1)		Board of Selectmen		J, M
02	(1)		Civil Defense Agency		C, E, F, H, J
03	(2)	10-12-88	Police Department	7	E, J
04	(2)		Fire Department		E, J, K
05	(1)	02-17-88	Public Works Department	2	J
06	(2)		School Department		J
07	(1)		Board of Health		J
08	(1)		Radiological Officer		K
09	(1)		Transportation Officer		J
10	(1)	03-10-88	Shelter Officer	0	J
11	(1)		Harbor Master		J
12			Council on Aging		J
*13	(2)		Emergency Medical Services		J, L
*13	(1)	02-17-88	Communications Officer	0	
*Duplicate Numbers					
	(1)		RACES		
	(2)(4)		Special Needs Officer		
	(2)		Dept. Mental Retardation		
	(2)		Mass. Dept. Mental Health		
	(3)		Health Officer		
	(2)(5)		ENMDS		
21	(1)		Public Information		G

PLYMOUTH

Implementing Procedures:

IP_No.	(Note)	Date	Procedure Title	Draft_No.	RERP Part Implemented
22			Monitoring and Decontamination		J, K
23			Handling Contaminated Injured Persons		L
24	(2)	01-14-88	Message Control	1	H
25			Siren Activation		E
26			Training		O
27			Drills and Exercises		N
28			Program Maintenance		P
30		09-14-88	Telecommunications Devices for the Deaf	1	
41	(1)		Tiny Town Child Care		J
42	(1)		Jack and Jill		J
43	(1)		Kinder Collage		J
44	(1)		Busy Bee Nursery and Day Care		J
45	(1)		Kidsport, Inc.		J
46	(1)		Seven Hills Nursery School		J
47	(1)		Methodist Nursery School		J
48	(1)		Cooperative Child Care		J
49			First Baptist Church		J
50	(1)		Zion Christian Pre-School		J
51			Little People's Place		J
52	(1)	01-27-88	Happy Day Nursery, Inc.	0	J
53	(1)		Kinder Haus Nursery		J

PLYMOUTH

Implementing Procedures:

<u>IP_No.</u>	<u>(Note)</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
54	(3)		Pilgrim Manor Child Care		J
55	(1)	01-29-88	New Testament Christian School		J
56					
57	(1)		Pinewood School of Montessori		J
58	(2)		South Shore Industries		J
59	(2)(4)(5)		Jordan Hospital		J
60	(1)		Mayflower House		J
61	(1)		Pilgrim Manor		J
62	(1)		Beverly Manor		J
63	(1)		Newfield House		J
64	(1)		Plymouth Nursing Home		J
65	(1)		Chilton House		J
66	(1)		High Point		J
67	(1)		Plymouth Day Habilitation		J
68			Rainbow		J
69	(2)		Cachalot Scout Reservation		J
70	(2)		Camp Clark		J
71	(2)		Camp Massasoit		J
72	(2)		Camp Squanto		J
73	(2)	04-14-88	Camp Child	1	J
74	(2)		YAD		J

Community: CARVER

Date entered: 10-18-88

RERP 6-24-88 Rev. 4 Received 6-24-88

Cross Reference 10-03-88 Rev. 0 Received 10-03-88

Corrective Action Response 10-03-88 Received 10-03-88

Implementing Procedures:

<u>IP_No.</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
01	06-30-88	Board of Selectmen	1	J, M
02	08-15-88	Civil Defense Agency	2	C, F, H, J
03	10-07-88	Police Department	3	E, J
04	09-21-88	Fire Department	4	E, J, K
05	10-07-88	Public Works Department	2	J
06	07-14-88	School Department	0	J
07	06-27-88	Board of Health	2	J
08	08-18-88	Radiological Officer	4	K
09	08-19-88	Transportation Officer	2	J
10	08-15-88	Shelter Officer	3	J
11	08-19-88	Emergency Medical Services	2	J, L
12	06-24-88	Council On Aging	1	J
13	06-22-88	Communications Officer	1	E, F
14	01-18-88	RACES	1	F
15/20		Open		
21	06-28-88	Public Information	3	G
22	08-08-88	Monitoring and Decontamination	2	J, K
23	07-28-88	Carver School District Transportation Provider	0	J
24	10-06-88	Message Control	2	H

CARVER

IP_No.	_Date_	Procedure Title	Draft_No.	RERP Part Implemented
25		Siren Activation		E
26		Training		O
27		Drills and Exercises		N
28		Program Maintenance		P
29		Special Needs Program Maintenance	4	J
30	09-14-88	Telecommunications Devices for the Deaf	1	
41		Cranberry Crossing Nursery and Day Care		J
42		Web of Life Day Care		J
43		Captain Pal Preschool		J
44		Kids Count		J
45		Camp Clear		J
46		Hilltop Nursing Home		J
47		Betty's Place		J
48		Reach Group Home		J
49		Edenville Railroad		J
50	04-27-88	Shelter Manager	2	J
51	04-27-88	Atwood House	2	J
52	04-27-88	Benjamin Ellis School	2	J
53	04-27-88	Carver High School	2	J
54	04-27-88	Governor John Carver School Bldg. A	2	J

<u>IP_No.</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
55	04-27-88	Governor John Carver School Bldg. B	2	J
56	04-27-88	Camp Clear	2	J
57	04-27-88	Pinewood Way	2	J
58	04-27-88	Crane Brook Tea Room	2	J
59	04-27-88	Faith Baptist Church	2	J
60		Open		
61	04-27-88	VFW Post #7421	2	J
62	04-27-88	United Methodist Church	2	J
63	04-27-88	Christian Unity Hall	2	J
64	04-27-88	Cranberryville Tenting and Trailer Park	2	J

No.	Title	Date
3	Emergency Operations Center	11-01-88
4-1C	Introduction to Fire Department	06-10-88
4-2C	Fire EOC Rep & CFD Duty Officer	06-15-88
4-3C	Fire Dispatcher	06-14-88
4-4C	Siren Spotting & Route Alerting	06-14-88
4-5C	Fire Dept. Dosimetry Coordinator	06-14-88
4-6R	Emergency Worker Monitoring & Decontamination	11-02-88
6-1C	Civil Defense Director	10-25-88

CARVER

<u>No.</u>	<u>Title</u>	<u>Date</u>
9-1C	Introduction to Emergency Medical Services	02-09-88
9-2C	Emergency Care During an Incident at PNPS	02-24-88
9-3C	EMS EOC Rep	03-31-88
9-4C	EMS Duty Officer/Dosimetry Coordinator	03-30-88
11-1C	Introduction to School Procedure	07-22-88
11-2C	Superintendent & Staff	03-28-88
11-3C	Principals	03-28-88
11-4C	Maintenance Staff	03-28-88
19-2C	Council on Aging	05-16-88
21-1C	Shelter Officer	07-15-88
21-2C	Shelter Manager	04-29-88

Community: TAUNTON

Date entered: 10-18-88

RERP 7-28-88 Rev. 5 Received 7-28-88

Cross Reference Rev. Received

Corrective Action Response Rev. Received

Implementing Procedures:

IP_No.	(Note)Date	Procedure Title	Draft_No.	RERP Part Implemented
01	04-29-88	Mayor/City Council	3	
02	05-02-88	Civil Defense Director	3	
03	04-30-88	Police Department	3	
04	04-28-88	Fire Department	3	
05	03-29-88	Department of Public Works	3	
06	04-27-88	School Department	3	
07	03-29-88	Board of Health	3	
08	04-28-88	Radiological Officer	3	
09	03-16-88	Communications Officer	3	
10	03-11-88	American Red Cross	3	
11	03-16-88	RACES	3	
12	03-16-88	Animal Control Officer	3	
13	04-27-88	City of Taunton Reception Center	3	
17	04-27-88	Transportation Officer	3	
18	03-16-88	Hospital Representative	3	
21	02-26-88	Public Information	3	
22	03-10-88	Monitoring and Decontamination	3	
23	04-28-88	Emergency Medical Services	3	

TAUNTON

<u>IP_No.</u>	<u>(Note)Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
24	01-05-88	Message Control	3	
25	02-02-88	Reception Center Medical Support	3	
26		Training		
27		Drills and Exercises		
28		Program Maintenance		

Lesson Plans:

<u>No.</u>	<u>Title</u>	<u>Date</u>
3-1T	Intro to EOC	09-22-88
3-2T	Communications Officer	09-22-88
3-3T	RACES	04-01-88
3-4T	Overview of Message Control	05-06-88
3-5T	Mayor	09-22-88
3-6T	Radiological Officer	09-23-88
3-7T	Hospital EOC Representative	05-06-88
4-1T	Intro to Fire Department	06-10-88
4-2T	Fire Chief & Fire/EOC Representative	09-19-88
4-3T	Fire Dispatcher	9-14-88
4-4T	Dosimetry Coordinator	9-19-88
5-1T	Intro to Police Department	06-15-88
5-2T	Police Chief	05-01-88
5-3T	Police EOC Official	05-01-88

TAUNTON

No.	Title	Date
5-4T	Police Dispatcher	05-01-88
6-1T	Intro to Civil Defense	05-16-88
6-2T	Civil Defense Director	05-25-88
7-1T	Overview of DPW	09-26-88
9-1T	Intro to EMS	05-01-88
9-2T	Medical Director	05-01-88
9-3T	EMS Dosimetry Coordinator	05-01-88
9-4T	Senior Ambulance Technician	05-01-88
10-1T	Intro to Reception Center	08-04-88
10-2T	Taunton EOC Representative	04-12-88
10-3T	Taunton Reception Center Manager	09-21-88
10-5T	Overview of Taunton Reception Center Medical Support	09-21-88
12-1T	Intro to Transportation	05-02-88
12-2T	EOC Reception Center Transporta- tion Officer	09-22-88
12-3T	Staging Area Teams	09-22-88
19-1T	Overview of Board of Health	03-14-88
23-1T	Overview of Animal Control Officer	09-21-88

Community: KINGSTON

Date entered: 10-17-88

RERP 10-04-88 Rev. 5 Received 10-12-88

Cross Reference 10-04-88 Rev. 0 Received 10-12-88

Corrective Action Response 10-04-88 Received 10-12-88

Shelter Implementation Program 9-30-88

Implementing Procedures:

<u>IP_No.</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
01	09-27-88	Board of Selectmen	4	J, M
02	09-30-88	Civil Defense Agency	3	C, F, H, J
03	09-30-88	Police Department	3	E, J
04	09-29-88	Fire Department/Emergency Medical Services	3	E, J, K, L
05	09-26-88	Highway Department	3	J
06	09-22-88	School Department	2	J
07	09-30-88	Health EOC Representative	3	J
08	09-23-88	Radiological Officer	3	K
09	09-26-88	Transportation Officer	4	J
10	10-04-88	Shelter Officer	4	J
11	09-20-88	Harbor Master	3	J
12	09-20-88	Special Needs Officer	3	J
13	09-20-88	Communications Officer	3	F
14	05-31-88	RACES	2	F
15/20		Open		
21	09-20-88	Public Information	3	G
22	09-20-88	Monitoring and Decontamination	3	J, K

KINGSTON

IP_No.	_Date_	Procedure Title	Draft_No.	RERP Part Implemented
23		Open		
24	06-03-88	Message Control	2	H
26		Training		O
27		Drills and Exercises		N
28		Program Maintenance		P
29	06-07-88	Special Needs Maintenance	2	J
30	09-14-88	Telecommunications Devices for the Deaf	1	J
31		Open		
41	06-06-88	Sacred Heart Schools	1	J
42	09-21-88	Growth Unlimited Preschool	3	J
43/44/45		Open		
46	09-22-88	Camp Mishannock	2	J
47	09-23-88	Camp Norae Boy Scouts	2	J
48	09-26-88	Evanswood Retirement	2	J
49	09-30-88	Meadowcrest Apartments	2	J
50	09-30-88	Proviencial Residence	3	J
51	09-30-88	Blueberry Hill Rest Home	2	J
52	09-30-88	Margaret W. Carter Vets Home	2	J
53	09-30-88	Shelter Manager	3	J
55	09-30-88	Sacred Heart Elementary School	3	J
56	09-30-88	Sacred Heart High School	3	J

KINGSTON

<u>IP_No.</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
57	09-30-88	Stop and Shop Plaza	3	J
58	09-30-88	Kingston Elementary School	3	J
108	09-30-88	Cordage Park Company	3	J

Lesson Plans:

<u>No.</u>	<u>Title</u>	<u>Date</u>
3-1K	Introduction to Emergency Operations Center	10-17-88
3-2K	Communications Officer	10-17-88
3-3K	RACES	10-17-88
3-4K	Message Control	10-17-88
3-5K	Board of Selectmen	10-17-88
3-6K	Radiological Officer	10-17-88
3-7K	Special Needs	10-17-88
4-2K	Kingston Fire EOC Representative	04-29-88
5-2K	Kingston Police EOC Rep	05-17-88
6-2K	Civil Defense Director	06-02-88
6-3K	EOC Operations Officer	06-02-88
7-2K	Kingston Highway EOC Rep	05-16-88
8-1K	Harbor Master	07-21-88
11-2K	Kingston School Department Superintendent and Staff	03-30-88
19-1K	Board of Health	04-29-88
20-6	Public Information Assistant	08-01-88

Community: MARSHFIELD

Date entered: 10-18-88

RERP 7-11-88 Rev. 5 Received 8-12-88

Cross Reference 7-28-88 Rev. 0 Received 8-12-88

Corrective Action Response Rev. Received

Implementing Procedures:

<u>IP_No.</u>	<u>Date</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
01	07-13-88	Board of Selectmen	2	J, M
02	07-21-88	Civil Defense Agency	2	C, F, H, J
03	07-20-88	Police Department	2	E, F
04	07-26-88	Fire Department	3	E, J, K
05	07-23-88	Public Works Department	2	J, L
06	07-14-88	School Department	0	J
07		Health Department		J
08	07-22-87	Radiological Officer	2	K, J
09	07-23-88	Transportation Officer	2	J
10	04-27-88	Shelter Officer	2	J
11	07-20-88	Harbor Master	2	J
12	07-20-88	Special Needs	2	J
13	07-19-88	Communications Officer	3	F, K
14/20		Open		
21	03-10-88	Public Information	2	G
22	07-25-88	Monitoring and Decontamination	2	J, K
23	07-22-88	Emergency Medical Services	2	
24	07-22-88	Message Control	3	H

IP_No.	Date	Procedure Title	Draft_No.	RERP Part Implemented
25		Siren Activation		E
26		Training		O
27		Drills and Exercises		N
28		Program Maintenance		P
29	06-13-88	Special Needs Maintenance	2	J
30	09-14-88	Telecommunications Devices for the Deaf	1	
31		Open		
41	04-27-88	Gov. Winslow Elementary School	2	J
42	04-27-88	Brant Rock Union Chapel	2	J
43	04-27-88	Saint Anna by the Sea	2	J
44	04-27-88	Our Lady of Assumption	2	J

No.		Title	Date
2-5M	11-04-88	Intro to DNN Network	1

Community: BRIDGEWATER

Date entered: 10-17-88

RERP 8-18-88 Rev. 4 Received 9-27-88

Cross Reference 8-26-88 Rev. 0 Received 9-27-88

Corrective Action Response 9-21-88

Implementing Procedures:

IP_No.	Date	Procedure Title	Draft_No.	RERP Part Implemented
01	03-23-88	Board of Selectmen	3	J, M
02	08-08-88	Civil Defense Agency	3	C, F, H, J
03	06-14-88	Police Department	3	E, J
04	06-27-88	Fire Department	3	E, J, K
05	06-09-88	Highway Department	3	J
06	06-06-88	School Department	3	J
07	07-01-88	Board of Health	3	J
08	02-16-88	Radiological Officer	3	K
09	02-16-88	Communications Officer	3	E, F
10	05-08-88	American Red Cross	3	J
11	02-16-88	RACES	3	F
12	02-16-88	Animal Control Officer	3	J
13	09-08-88	Bridgewater State College	1	J
17	03-21-88	EOC Reception Center Transportation Officer	3	J
21	02-23-88	Public Information	3	G
22	03-09-88	Monitoring and Decontamination	3	J, K
23	02-04-88	Emergency Medical Services	3	L
24	12-23-87	Message Control	3	H

BRIDGEWATER

<u>IP_No.</u>	<u>_Date_</u>	<u>Procedure Title</u>	<u>Draft_No.</u>	<u>RERP Part Implemented</u>
25	04-14-88	Reception Center Medical Support	3	J
26		Training		O
27		Drills and Exercises		N
28		Program Maintenance		P

Lesson Plans:

<u>No.</u>	<u>Title</u>	<u>Date</u>
6-1B	Civil Defense	07-18-88
7-	Bridgewater Highway Dept.	06-13-88
11-1B	Bridgewater School Dept.	08-01-88
19B	Board of Health	11-19-88

Community: DUXBURY

Date entered: 12-02-88

RERP 5-07-85 Rev. 1 Received 5-07-85

Implementing Procedures:

As of 12-02-88 the Civil Defense Director reports that they have a total of 38 IP's on hand.

Three of these, Selectmen, Town Manager and Public Affairs, are under development.

All of the others are complete and have been reviewed by the respective department heads. DPW and Harbor Master need drastic changes.

RERP Committee members have 35 IP's in their possession and are currently reviewing on an individual basis.

The RERP Committee has not met formally to review and forward the IP's to the Selectmen.

Lesson Plans:

No.	Title	Date
11-1D	Duxbury Introduction to School Procedure	08-01-88
11-2D	Superintendent and Staff	04-29-88
11-3D	Duxbury School Principals	03-28-88
11-4D	Maintenance Staff	03-29-88
19-1D	Overview of Board of Health	10-06-88

AT THE REQUEST OF MS. MARY DINAN, THE FOLLOWING
ATTACHMENT IS BEING ADDED TO THE PUBLIC RECORD.

15 Jeremiah Dr.
Duxbury Ma. 02332
Dec. 7, 1988

Dear Mr. Chitt,

The following information is
pertinent to emergency preparedness
regarding the Duxbury Plan.

I would appreciate it, if you would include
this information in the Public Record, as well
as giving each Commissioner and appropriate
party copies.

I look forward to your response.

Sincerely Yours
Mary L. Donald
vice-Chairman
Duxbury Emergency Response
Study Committee

December 7, 1988

Duxbury Board of Selectmen
Town Hall
Duxbury, MA 02332

Gentlemen:

We would like to ask the Duxbury Board of Selectmen for clarification of the November 1, 1983, memo to William Russell of the Nuclear Regulatory Commission. This letter is a brief synopsis of the comments made by Fire Chief Carl O'Neil, who was acting as Civil Defense Director for the town. The meeting took place on October 26, 1988. Representatives of the NRC and the State were present. Chief O'Neil was allowed to make changes on anything he disagreed with in the context of the memo.

We are concerned, as citizens of Duxbury and as members of the Emergency Response Study Committee, with not only the content of this memo, but also with the tone. We fear, as past dealings have documented, that any misleading information could be misinterpreted and lead to further confusion and delays with the planning process. We ask you to instruct Carl O'Neil to clarify any misconceptions in writing to the NRC. We feel that, in light of the December 9 meeting in Rockville, MD., time is of the essence. We are asking for clarification on the following points:

Implementing Procedures: For the record, our committee is currently called the Emergency Response Study Committee not RERP. According to our recollection, and it can be verified with our last meeting minutes, no procedures have been completely reviewed. At one meeting we briefly went over the procedures for the fire department. At our last meeting we had so many concerns with inadequate manpower that we agreed and voted that all procedures were to stay within the committee until we had some sort of completed list as to the who, what, and where of these procedures. We are afraid that the memo could lead one to interpret that all but three of the procedures were dealt with.

Schools: We do not consider the teacher participation and buses minor. For the past two years we have considered these issues to be of major concern. In light of the June survey of the teachers and the fact that to our knowledge we only have one signed contract for buses these are definitely major concerns. The contract for the buses is for twelve buses with a company located 70 miles away in Worcester.

Personnel Resources: It is our understanding that there are staff shortages especially in the DPW and the fire department as indicated in discussion at the December 5 selectmen's meeting. We would like to emphasize that many on our committee have a great deal of trouble relying on volunteers to fill roles.

Training: Our committee was told that we would view the training before it progressed any further. We have reservations about the medical accuracy of the modules. At our last meeting the assertion was made that medical doctors had not viewed this material.

Special Needs Population: We verified with the Office of Handicapped Affairs the following information: Their office has been trying to get a survey done to identify those with special needs. They have attempted to make it clear that there is documented proof that people do not respond to ads in the newspaper. Further, a total of nine ads have been taken out in the entire EPZ. We feel that the language in the memo which finds the special needs population evacuation not to be of major concern to be offensive and irresponsible. No amount of money will protect these people if they are not properly identified and cared for.

Beaches: We were unaware that evacuation using the Powder Point Bridge would greatly alleviate anything. The population would merge onto two-way streets through the town. We are also concerned, having seen Mr. Quaid's presentation, with the trite reference to the high tides. In the summer months one is talking about large numbers of stranded people.

We would appreciate your prompt attention in this matter and look forward to hearing from you.

Sincerely yours,

Claire Donahue

Mary Dinan



NUCLEAR REGULATORY COMMISSION
REGION I
475 ALLENDALE ROAD
KING OF PRUSSIA, PENNSYLVANIA 19406

RECEIVED

NOV 28 1988

TOWN OF DUXBURY
BOARD OF SELECTMEN

November 1, 1988

MEMORANDUM FOR: William Russell, Regional Administrator

THRU: R. Bellamy, Chief, Facilities Radiation Safety and
Safeguards Branch, DRSS

FROM: W. Lazarus, Chief, Emergency Preparedness Section, FRSSB
R. Hogan, Emergency Preparedness Specialist, NRR

SUBJECT: MEETING WITH CIVIL DEFENSE OFFICIALS IN THE TOWN OF DUXBURY
TO DISCUSS THE STATUS OF EMERGENCY PREPAREDNESS ON OCTOBER 26,
1988

2-2 (a)
11/5/88

BACKGROUND

A meeting was held in the Duxbury Fire Station on October 26, 1988. The purpose of this meeting was to obtain the latest factual information regarding the status of emergency plans, implementing procedures, and facilities, directly from the Director of Civil Defense for the town of Duxbury. The Director of Civil Defense was also provided an opportunity to bring any previously unidentified concerns regarding the status of emergency preparedness to the attention of the NRC.

ATTENDEES

Carl O'Neill, Duxbury Civil Defense Director and Fire Chief
Alfred Slaney, Planner, Massachusetts Civil Defense Agency (MCDA)
William J. Lazarus, Chief, Emergency Preparedness Section, NRC Region I
Rosemary T. Hogan, Emergency Preparedness Specialist, Office of NRR

DISCUSSION

Mr. O'Neill presented the following status summaries and concerns regarding the state of emergency preparedness in the Town of Duxbury.

Implementing Procedures

There are approximately 38 implementing procedures (IPs), none of which have been sent to FEMA for review. All of the IPs, except three, have been reviewed by cognizant Department Heads. The three IPs which are still under development are: Selectmen; Town Manager; and Public Information Officer. The RERP has reviewed the Fire and Civil Defense IPs and are reviewing the School IP. All IPs will be sent in segments to the Board of Selectmen for their review. Copies of the Plan, IPs, Shelter Implementation Plan and Evacuation Time Estimate are available in the EOC.

The following are specific concerns which remain to be resolved.

Schools: The school committee does not agree with the school

procedure as drafted, but is considering early dismissal of school children at the ALERT, rather than have the buses in standby and evacuate the children at a SITE AREA EMERGENCY. There is no sound technical basis for the position and in some cases would require three round trips of the school buses. This is contrary to the recommendation of the Civil Defense Director and MCDA who would like to see the procedure remain as it is. There are a few other minor concerns involving role conflict of teachers and the guarantee of sufficient buses which remain to be resolved.

Personnel Resources

There are a few personnel shortages which need to be filled. The EOC staff does not have a complete second shift complement and the police department needs two additional staff for Gurnet-Saquish route alerting if necessary. All other departments appear to have sufficient staff.

Evacuation Time Estimate

The new ETE has been received, but it has not been thoroughly reviewed.

Equipment and Facilities

The EOC is nearing completion. The facility is expected to be complete in four weeks when the communication equipment is installed. Some portable radios, a repeater and a LORAN navigation radio should be delivered within a few weeks.

The Board of Selectmen has not approved a reception center community. Although the current plan provides for evacuation to Bridgewater or Wellesley, the Selectmen are opposed to Wellesley. There are reservations on the use of Bridgewater, as well, because the evacuation routes to that community would be blocked delaying evacuation.

The police need a 4 wheel drive vehicle to be used for route alerting of the Gurnet-Saquish Beach area.

Training

Training has just begun, but is progressing very smoothly.

Barry Report

Mr. O'Neill thought the Barry report accurately reflected the concerns and the status of emergency preparedness in Duxbury.

Commission Briefing

Mr. O'Neill indicated that the statements made by Senator Kennedy, Representative Studs, and Lt. Governor Murphy reflected the status of

emergency preparedness for the town of Duxbury.

Ability to Implement

The Civil Defense Director does not believe the plan could be implemented at this time because so little training has been completed. No portions of the plan have been tested. The Civil Defense Director has notified the Selectmen that he believes that training, equipment installation, plan and IP development, mini-drills and a town drill could be complete by the middle of February, 1989.

Special Needs Population

Identification of the special needs population is slow due to the reluctance of that population to highlight their handicaps. Repeated advertisements in the local papers requesting self-identification is continuing. TDDs are available to be delivered to deaf people who request them. Special needs population evacuation was not identified as a major concern provided resources arranged by the state are actually available.

Beaches

The Gurnet-Saquish procedure is still under review by the Gurnet-Saquish Association. Concerns are that siren coverage may be inadequate. There is no feedback method to determine if the sirens have actuated and Duxbury police do not have sufficient resources to run route alerting as a back-up for siren failure. Route alerting would take at least 45 minutes to complete. Chief O'Neill indicated that some of the estimates regarding the Gurnet-Saquish beach area he has seen have been inflated. He estimated the number for the Saquish Beach at about 4,000 maximum (2,000 typical) on peak days. The road to this beach is under water from high tides for a part of 2 days per month (2 to 3 hours). The water may be waist high in that section.

There are 4,000 to 5,000 people on the Duxbury Beach during the peak part of the season. The Powder Point Bridge has been re-opened and provides a second evacuation route for those evacuating the Duxbury-Gurnet-Saquish beach area. This greatly improves the situation. People are requested to evacuate at the ALERT and the beach is closed.

SUMMARY

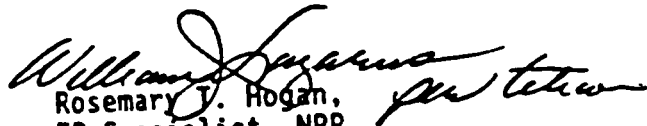
The major concerns are getting equipment in place and working, completing the training and drills, and resolving the school evacuation issue, and final approval of procedures and plans.

→ Mr. O'Neill was provided an opportunity to review this memorandum and his comments for clarification have been incorporated. ←

1/No7

bury


William J. Lazarus,
EP Section Chief, Region I


Rosemary T. Hogan,
EP Specialist, NRR

cc: J. Dolan, FEMA Region I

AT THE REQUEST OF STEPHEN B. COMLEY, THE FOLLOWING
ATTACHMENT IS BEING ADDED TO THE PUBLIC RECORD.

**We The People
of the United States**
Stop Chernobyl Here

IMMEDIATE PRESS RELEASE

DATE: DECEMBER 9, 1988
SUBJECT: NRC HEARINGS ON PILGRIM
LOCATION: ROCKVILLE, MARYLAND
PRESS CONTACT: STEPHEN B. COMLEY, EXECUTIVE DIRECTOR
WE THE PEOPLE, INC.
ROWLEY, MASS.
508-948-7959

We The People is represented at this NRC hearing even though the agency refuses permission to speak. We The People was formed because many citizens of this country believe the agency is not doing its job, a fact confirmed by individuals within the NRC itself.

"For example, there are counterfeit, substandard piping materials, electrical components, and fasteners now built into most U.S. nuclear plants from New England to the West Coast including Pilgrim Station," Steve Comley, Executive Director of We The People said. "The NRC did not publicly notify nuclear plants about this serious safety problem until May 1988. We The People has a letter from the NRC saying the agency discovered the problem in January 1988, but the agency actually knew earlier than that date. I notified President Reagan myself in 1987," Comley said.

Such a delay in notification by an agency mandated to insure nuclear plant safety is unsettling. Even more disturbing is the NRC's action in lowering safety standards rather than requiring replacement of substandard materials. We The People is asking Congress to investigate this problem.

"There are also problems within the NRC which have a very serious impact on our democracy: the right of the public to have a say in nuclear plant decisions affecting their lives and the lives of future generations. The need for

OVER

Congressional action has become even more pressing with the recent Presidential Order on evacuation planning that overrides state and local powers to reject evacuation plans which won't work. The issue of nuclear power has become secondary with this action by President Reagan, which cracks the very foundation of American democracy, a government of the people and by the people," Comley said.

That anti-democratic trend embodied in this hearing where only selected state and local officials are allowed to speak. "Is this because the public is more likely to be harshly critical of the NRC than are state officials?" Comley asked. "Given the NRC track record of ignoring all criticism permitting only certain officials to speak is only a public relations ploy," said Comley.

Why has public input been deliberately limited? Does the NRC believe it has nothing to learn or is the agency afraid of what it might learn?

"If the NRC thinks there is nothing more to be learned, then decisions about restarting Pilgrim Station have already been made and this hearing is a sham," Comley commented. "If the NRC is denying public input because it is afraid of what it might hear publicly, then our worst fears about the agency are verified, that it has a much greater commitment to licensing unsafe nuclear plants and maintaining nuclear industry profits than it has in protecting the public," Comley concluded.



THE COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF THE ATTORNEY GENERAL

JOHN W. McCORMACK STATE OFFICE BUILDING
ONE ASHBURTON PLACE, BOSTON 02108-1698

JAMES M. SHANNON
ATTORNEY GENERAL

December 6, 1988


Stephen B. Comley
We the People
Box 277
Rowley, MA 01969

Dear Mr. Comley:

Thank you for your letter to Attorney General Shannon dated November 30, 1988. I have reviewed the analysis by We the People. In order to complete our review, I would appreciate the original reports footnoted at the end of your analysis. I would also appreciate any additional information you could give me concerning the confidential informants within the NRC.

I look forward to hearing from you shortly.

Very truly yours,


Stephen A. Jonas
Deputy Attorney General
Chief, Public Protection Bureau

SAJ/BT

WE ARE ALSO NOTIFYING EVERY U.S. SENATOR, CONGRESSMAN, GOVERNOR (INCLUDING THE "PUSSYCAT") AND WHITE HOUSE STAFF TO ENDORSE THIS CONGRESSIONAL INVESTIGATION.

**We The People
of the United States**
Stop Chernobyl Here

Dear Congressional Representative:

This letter and the enclosed attachments detail the Nuclear Regulatory Commission's (NRC) failure to protect public health and safety as is its Congressional mandate. The agency does not enforce its own standards and regulations for safe nuclear plant construction and operation, nor does it ensure all residents near nuclear plants can be properly evacuated in the face of a nuclear accident.

Enclosure 1, Counterfeit and Substandard Materials (Parts 1 & 2), analyzes information from sources including recent NRC reports. It shows that most U.S. nuclear plants (from New England to the West Coast) have been built with counterfeit materials which are far below the agency's required standards for nuclear plant safety. These counterfeit materials include electrical components such as circuit breakers, piping materials, flanges, valves, and fasteners such as nuts and bolts. NRC documents show these materials repeatedly failed tests of strength and reliability. The agency did not order the counterfeit parts be replaced even though use of these materials means nuclear plants are much less safe than the agency believed. Instead, the NRC lowered the safety standards for these materials.

As recently as a few weeks ago, the NRC raided four more Southern California firms suspected of selling counterfeit electrical components to nuclear power plants (see Enclosure 2, Sworn Affidavit by U.S. Senior Investigator). With each passing day, the magnitude of the problem becomes more alarming. The NRC is only now beginning to address the problem, not because of its diligence in protecting the public health and safety, but because the problem has become so widespread that the Commission can no longer ignore it.

This is a dangerous situation. The NRC and the nuclear industry have always claimed that even though nuclear technology is dangerous, the plants are safe enough because they are built with back up, redundant, safety systems. However, since materials in the main safety systems as well as in back-up systems are substandard, claims of safety because of redundant systems are invalid.

Since nuclear plants are less safe than the agency thought, plans for protecting the surrounding populations should be strengthened. Such is not the case. For example, people with special needs have not even been identified within the ten mile emergency planning zone. Evacuation plans approved by the NRC have no provisions for elderly, deaf, and blind people, and others with special needs. Instead, most of these people will be left behind. This is discrimination against the handicapped, in violation of federal law and the laws of many states. It is morally reprehensible to ignore persons who would most need assistance in time of emergency (see Enclosure 3, Related Information, pages 12 & 13, We The People's explanation of the special needs issue).

Special needs people appear to be expendable in the agency's eyes; at some nuclear plants that notion of expendability extends to the entire population. In the case of New Hampshire's Seabrook Station, the agency seriously downgraded required standards and rules for evacuation planning so as to be able to ignore strong evidence the seacoast area north of Boston cannot be evacuated. The Commonwealth of Massachusetts, after extensive study and deliberation, determined that evacuation was impossible. The response of the NRC was to label the state as uncooperative. However it is not uncooperative for the state to make legitimate decisions about the welfare of its citizens. This situation resulted in a rule change that substituted a "best effort" standard for safety standard with regards to evacuation planning.

The need for Congressional action has become even more pressing with the recent Presidential order on evacuation planning that overrides state and local powers to reject evacuation plans which won't work. The issue of nuclear power has become secondary with this action by President Reagan, which cracks the very foundation of American democracy, a government of the people and by the people.

These brief examples and the attachments supporting them, demonstrate an NRC pattern of allowing operation of nuclear plants at the expense of public safety. When the agency's rules and safety standards, established as the basis for protecting the public, conflict with plant operation, the safety standards are reduced or abolished.

The NRC is answerable only to Congress, and to date, Congress has not been asking serious questions of the NRC. It is essential the body representing the people of the U.S. investigate the agency and take action to ensure the public safety, since the agency itself has moved further and further from that responsibility. There are a number of nuclear plants not yet in operation which have been built with counterfeit materials. Seabrook Station is one of them. Congress must prevent contamination of any nuclear plant by preventing the issuance of any licenses until all counterfeit materials have been identified and replaced. This will also keep open the option of conversion to much safer energy alternatives like gas. Plants already in operation must also be ordered to replace all counterfeit parts.

Until then, the people of this country are in danger. As the Chernobyl nuclear plant accident shows, even though it was not the worst-possible accident, radiation knows no boundaries. The industry and the NRC have refused to address the implications of the Chernobyl accident. They can't even properly address the safety of people within the 10 mile radius of nuclear power plants, much less outside that limit.

In August, 1986, 80% of the town of Rowley, Massachusetts, petitioned President Ronald Reagan to conduct an independent investigation of the NRC, (copy enclosed, page 14 of Related Information). To date, there has been no response to Rowley's petition.

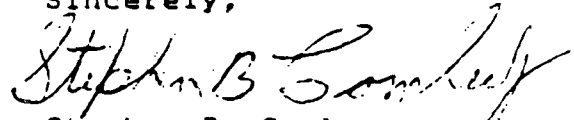
Former NRC Commissioner James Asselstine, in an interview August 15, 1986, said nuclear plant accidents in this country are inevitable because of how poorly they are built and operated. The NRC is mandated to regulate the industry so as to prevent such accidents, but it is Congress which must now enforce that mandate. In the absence of Congressional action, the NRC will be allowed to conduct "business as usual." This leads not only to a substantial risk of a serious nuclear accident, but exacerbates a crisis of public confidence in both the NRC and the Congress and their collective ability to safeguard the public health and safety.

We The People has contact with good people inside the NRC who are willing to come forward and expose the corruption within their agency if a Congressional investigation is granted. (see NRC quotes, page 11 of Related Information). The consequences of coming forward for these individuals will necessitate reasonable assurances that a full and fair investigation will ensue.

We The People has retained the services of Ernest Hadley, an attorney experienced in representing whistleblowers. He is a former associate of the Government Accountability Project in Washington, D.C. We The People can assist in bringing forward information to expose one of the biggest violations of the public trust that this country has ever witnessed. The nuclear industry is both wealthy and powerful, but, neither of those factors give it the right to deliberately jeopardize the health and safety of the American people.

I hope you will soon be able to find the time to meet with me and other members of our staff to further discuss this matter. Please inform me of your response at your earliest possible convenience.

Sincerely,



Stephen B. Comley
Executive Director
We The People, Inc.

SBC/mk

Enc:

- Enclosure 1: Counterfeit and Substandard Materials
- Enclosure 2: Sworn Affidavit by U.S. Senior Investigator
- Enclosure 3: Related Information Packet:

Correspondence including letter given to President Reagan August 15, 1988 and October 4, 1988 response to that letter from the NRC pages 2 & 3. The NRC's reply of July 18th which stated when they first learned there were counterfeit parts. The NRC stated it was January 17, 1988, but the agency actually knew earlier than that date.

Documentation of the enclosed materials is available on request.