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ROCHESTER GAS AND ELECTRIC CORPORATION • 89 EAST AVENUE, ROCHESTER, N.Y. 14649

JOHN E. MAIER  
VICE PRESIDENT

TELEPHONE  
AREA CODE 716 546-2700

May 22, 1981

Mr. Boyce H. Grier, Director  
Region I  
Office of Inspection and Enforcement  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Subject: Emergency Preparedness  
R. E. Ginna Nuclear Power Plant  
Docket No. 50-244

Dear Mr. Grier:

By letters dated December 30, 1980, we submitted Emergency Response Plans prepared by Rochester Gas and Electric, by Wayne and Monroe Counties, and by the State of New York in support of Ginna Station. The County and State plans were formally submitted for review and approval by the State to the Federal Emergency Management Agency (FEMA). In a letter dated April 6, 1981, FEMA provided to Mr. William Hennessy, Disaster Preparedness Commission, State of New York, a number of comments regarding the State and County Plans. FEMA has provided additional clarification in a letter to Mr. Hennessy dated May 1, 1981. Your letter of April 24, 1981 transmitted the April 6 FEMA letter to us and concluded that corrective action was required by the State and Counties within 120 days. As you requested, this letter and the attachment describe the plans for correcting each of the deficiencies in the April 6, 1981 FEMA letter.

Several general comments are in order. First, as noted in your letter, the deficiencies to be corrected involve actions by other parties and political institutions over which we have no control. We have, nevertheless, been working closely with appropriate authorities from Wayne County, Monroe County, and the State of New York. Based on meetings with these authorities, we believe that the deficiencies can be substantially resolved within the time required. The letter from FEMA indicated their understanding that the previous submittals had not been formal submittals for review and approval. Based on our discussions with State officials, this understanding is incorrect. Further, FEMA expects the Governor to submit the State Plan in accordance

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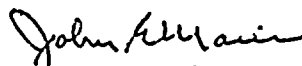
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with a proposed FEMA. It is our understanding that the responsible State official will submit the revised State and County Plans in a fashion similar to the previous submittal. We trust that such a submittal will be formally reviewed. We will submit the revised plans to the NRC as required by 10CFR Part 50.54.

Very truly yours,

  
J. E. Maier



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Attachment May 22, 1981  
New York State Radiological Emergency Response Plans

Element A.1 The New York State Executive Law, Article 2B, which currently is in place, provides that the County Chief Executive Officer retains authority until and unless the Governor declares an emergency condition to exist. The State Plan will be revised to be consistent with Article 2B and the County Plans. Should new legislation be passed, appropriate changes will be made in the State and County Plans. A paragraph added to the Concept of Operations in the County Plans will expand on the relationships between the State and Counties. Since the State Plan does not call on any private sector organizations for back up support, clarification of comment will be needed from RAC.

A block diagram showing the interrelationships of organizations is given in Fig. III-1 of Monroe and Wayne County plans.

Titles of responsible individuals are included in the plans. Phone numbers are available in procedures but due to confidentiality they are not included in the plans.

Element A.2 The functions and responsibilities for major elements of the plan are specified to key individuals by title in Table III-1 of the County Plans. Section III-C expands on this table of response activities.

As described in our response to Element A.1, the roles of the State and the Counties will be resolved in accordance with New York State Executive law, Article 2B. These roles will be clearly specified in the Plans.

Element A.3 Existing letters of agreement will be incorporated into the plans. Since NUREG 0654 states written agreements are not required where response functions are covered by laws, regulations or executive orders, a policy review will determine what other agreements are needed. Any additional letters found to be necessary will be requested.

Element C.1 The State Health Department has had long standing relationships with the Radiological Assistance Program through the United States Department of Energy. However, in accordance with the RAC comment, the plan will be more specific regarding contact persons for federal radiological assistance. Further clarification from RAC is required regarding RAP/IRAP. For the time being reference to RAP/IRAP will remain until notified of any change by Department of Energy. The Brookhaven laboratory has provided the NYS Health Department with time estimates for Federal Radiological Assistance for hypothetical accidents at reactors in NYS. Typically, response times quoted were four to six hours depending on location. Response time estimates will be reconfirmed with the Department of Energy.

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Element C.1.c first appeared in Rev. 1 of NUREG 0654 after plans were prepared. Some material to respond to this comment was previously submitted in the procedures. Additional information will be developed. Clarification from RAC is needed for specific federal requirements and their method of operation.

Element C.2.a NYS Planning Group believes that this element is presently covered adequately in the state plan. This may be a case where better cross-referencing will assist plan reviewers. (See Appendix 1 pages H,2,3,4,)

Element C.3 The state laboratory is the only facility which the NYS Health Dept. plans to use for its radiological monitoring functions. Other facilities are provided by the licensee and Federal Agencies. Private radiological labs will not be used for state analysis as already stated in the plan.

Element C.4 Further review will determine what letters of agreement are needed. (See also the response to Element A.3)

Element E.1 Figure III-2 is on page III-35 or III-36 in the County Plans. The state Plan will be expanded to include specific titles of designated personnel.

Elements E.5, E.6, and E.7 Additional information will be developed in the Plans and in implementing procedures. The State, Counties and utility, in concert, are preparing initial and follow up notification messages as well as appropriate broadcast media formats. Prepared messages for various sets of conditions will be available for use by the Emergency Broadcast System. Several messages are currently in the County Plans, Appendix B, and others will be developed. Details for notifying and providing prompt instructions to the public are now being written. Respiratory protection will be addressed during the development of material for the Public Information Officers.

Element F.1 Communication ties with Federal Agencies is a state responsibility and will be addressed in the State Plan. According to current understanding, all Federal Emergency Assistance should come through FEMA (with the exception of RAP/IRAP assistance). Figure III-2 is located on page III-35 or III-36 of county plans. Communication links are shown in Fig. III-1, land lines and radios are available at both county EOCs.

Means for communicating with radiological monitoring teams in the field will be provided by RACES volunteers as indicated in Appendix F and Implementing Procedures which are being developed.

Element F.2 Appendix F of County Plans delineates the capability of communications, including mobile medical support facilities. Appendix F will be reviewed and rewritten as necessary to give more depth in implementing procedures.

Element G.1 and G.2 The public education program is being developed jointly by the State, County and utility. It includes a brochure developed for each County. The overall program is addressed on page II-5 of the County Plans.

Element G.4 The communications system for exchange of information among State, County and utility spokespersons is being developed along with the public information program. Details will be included in implementing procedures. Arrangements for dealing with rumors will be referenced in the County Plans and

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cross referenced.

Element G.5 The State Plan will address this comment. Plans for coordinating state, local, licensee annual news media briefings will be developed jointly.

Element H.7 Further planning is underway to provide for a field monitoring system which will be included in County Plans. The implementing procedures will provide for equipment disbursement, security, accessibility and reliability, and personnel training. Under present plans, the State Department of Health does not have manpower nor equipment to provide radiological monitoring in the vicinity of the nuclear facility.

Element H.10, H.11 An appendix will be developed to provide identification of emergency kits and categories of equipment maintained. Implementing procedures for inspecting, operational checks, maintenance and calibration in accordance with NYS Radam 6-1 will be included in a Radiological Monitoring annex. Requests for additional equipment have been filed with the state ODP.

Element I.7, I.8 An accident assessment program is being developed at the state level. This program will directly relate to the field monitoring system mentioned in H.7. The results from this assessment will be included in implementing procedures of County Plans. Plume tracking will be provided for in the local level implementing procedure. Rochester Gas and Electric Corporation will provide accident assessment and field monitoring team data during the early hours of an incident. No fixed monitoring stations are planned. Survey routes and monitoring locations will be included in implementing procedures.

Element I.9 The comment is correct, New York State does not have airborne iodine detection capability. The utilities have the capability for iodine detection under all field conditions. Data will be provided on a timely basis to State EOC. This arrangement will be discussed with RAC.

Element I.10, I.11 Procedures are under development utilizing EPA guides for plume exposure. Aerial monitoring will depend on the RAP team. Ground monitoring teams are being established at the county level.

Element J.2 Annex H of Appendix C to the County Plans contains a map of evacuation routes. Evacuation of on-site personnel will be with others in ERPA I. The NFO Emergency Coordinator will advise the local sheriff of evacuation plans from the facility.

Element J.7 Procedures are being developed to correlate the results of aerial surveillance and area surveys with protective actions. These will be based upon EPA Guides and upon Tables III-2 and 3 (in the plans). The protective actions for ingestion pathways will be coordinated with the Department of Agriculture and Markets (see tables III-4, 5). Implementing Procedures are being developed.

Element J.10 Maps are available in Annex H of Appendix C in the County Plans. Appendix G will be rewritten to reflect the system of public notification which is being installed. The state policy on use of protective drugs needs further development. When a policy has been set the counties will follow state guidance in their plans. The need for agreements with public carriers will be

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reviewed. Those agreements that are deemed necessary will be included. NUS has projected traffic capacities under emergency and adverse weather conditions. Their study is based on a dynamic analysis which has been approved by NYS and NRC. This material will be incorporated in updated plans. Means for dealing with highway impediments and evacuation contingencies will be addressed in implementing procedures.

Element J.10.M More specificity will be included in the State plan as to how critical decisions at 4 and 6 are to be made, i.e., shelter vs. evacuation.

Element J.11 Department of Health in coordination with the Department of Agriculture and Markets will develop, with other State agencies, if required, procedures for protective measures for the ingestion pathway EPZ.

Element J.12 Provisions for registering and monitoring evacuees is included in the County Plans and will be addressed further in implementing procedures.

Element K.3 Implementing Procedures for the County Radiological Officer will be written to incorporate the capability to determine doses and maintain records on a 24 hour/day basis. Both self-reading and permanent dosimeters will be available to emergency workers.

Element K.4 Section III-E of the County Plans will be revised to reflect that the County Manager in Monroe County or Chairman of the Board in Wayne County will have the responsibility for authorizing emergency workers to receive doses in excess of established guidelines. They will coordinate their decisions with the State Health Commissioner.

Element K.5 The specified action levels will be reevaluated, however clarification is being requested from RAC as to suggested limits. More specific instructions for decontamination will be developed.

Element L.1, L.3 State and County Plans will include listings of hospitals available for medical services.

Element L.4 Information as requested will be included in implementing procedures. The need for agreements is under review. (See response to Element A.3).

Element M.1, M.3 Procedures are being developed to expand on items now in the plan, Section IV-B. Local decisions will be based on State Health Department recommendations. The present overall disaster preparedness plan in accordance with Article 2-B adequately addresses this criteria. The radiological plan will reference the appropriate sections of the disaster plan.

Element M.4 The State Plan will be expanded to describe the long term monitoring program.

Element N.1 A policy review is underway on how to address the item at both the State and County level due to problems of interference in regular work routine and the need for additional funding.

Element N.2 Clarification from RAC as to the content of drills is required before further details can be written. Appropriate procedures will be written to

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schedule and evaluate drills.

Element N.3 Exercises will be prepared by the State Planning Group with the utilities and Counties input. The guidelines of NUREG 0654 will be followed.

Element O.1, O.4 A training program for instructing personnel at the State and County levels is under development. It will be included as an annex to the Plans. Training will be offered to all volunteer emergency workers, however New York State questions the verbiage "shall be trained."

Element P.1 The County director and his staff, as well as the State Planning Group, have been involved with civil defense for many years. Their daily work with emergency planning and reviewing of plans is the best training possible. The Directors of all key agencies under the Emergency Director are highly qualified in their fields. Clarification from RAC will determine what specifics are needed.

Element P.3 An individual in the State Dept. of Health will be designated as Emergency Coordinator.

Element P.4 Procedures for document control will be incorporated into the County Plans.

Element P.7 A listing of implementing procedure will be incorporated as an appendix or as Section V in the Table of Contents. Further guidance from RAC is needed as comment P.7 and P.8 appear to be in conflict.

Element P.10 Implementing procedures on document control will address the need to verify and update telephone numbers quarterly.