



NIAGARA MOHAWK POWER CORPORATION/300 ERIE BOULEVARD WEST, SYRACUSE, N.Y. 13202/TELEPHONE (315) 474-1511

May 26, 1981

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

Re: Nine Mile Point Unit 1  
Docket No. 50-220  
DPR-63

Dear Mr. Grier:

Your letter to Mr. T. E. Lempges dated April 24, 1981 identified deficiencies in the New York State and local emergency response plans. These deficiencies were specifically listed in a letter from the Federal Emergency Management Agency (FEMA) to the New York State Disaster Preparedness Commission, dated April 6, 1981, which was attached. Enclosed are proposed resolutions of these deficiencies.

We understand your concern relative to availability and allocation of resources necessary to address all of the FEMA deficiencies. Niagara Mohawk has supported the State of New York and the local areas with financial and technical assistance by participation in a committee of all New York State utilities with nuclear power plants. We continue to provide this support to assure that implementable plans are in place. This support will be provided irrespective of whether a state legislative requirement is present or not.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

A handwritten signature in dark ink, appearing to read 'D. P. Dise'.

D. P. Dise  
Vice President Engineering

GJG:ja

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Thirty Day Response to FEMA Comments on New York State  
and County Radiological Emergency Response Plans

(For Indian Point, Nine Mile Point, and James A. FitzPatrick Sites)

S - State Plan    C - County Plans    \*Same for both County and State

#### A. Assignment of Responsibilities

A.1.a. \* Comment: The relationships between the State and the Counties have yet to be resolved.

C Resolution: A generic clarification of emergency planning allocation of responsibilities among different levels of government is desirable in New York State, and the affected utilities are proposing legislation which should assist the coordination of emergency planning activities in the State. At present, Article 2-B of the New York State Executive Law specifies the emergency planning relationships between the State and Counties. This law and in particular sections 21 (3) (f), 22, 23, and 24 thereof, supplies an adequate basis at present for establishing the necessary governmental relationships. The County Plans are written in accordance with the State law as it exists today, and we believe that the applicable NRC criterion as stated in the regulation is specifically and adequately addressed in the County plans as they presently exist. Greater specificity with respect to assignment of support roles to State Agencies is required in the plans and this problem will be corrected with the promised cooperation of the New York State Nuclear Emergency Planning Group.

S Resolution: See resolution to county comment. In addition, portions of the State plan shall be rewritten to conform more closely with present Article 2-B of the New York State Executive Law. If proposed legislation is enacted, appropriate alterations in the State plan will be made.

A.1.b. C Comment: Same comment as above.

A.1.b. S Comment: Identify all private sector organizations to be used for back-up support.

C Resolution: Same response as above (A.1.a.). Each county organization concept of operation is stated in Section I.D. of each county plan. Each county suborganization concept of operation is stated on Page 1-1 in each implementation procedure. Their relationships to the total effort are shown in Figure III-1, Emergency Response Organization, in each county plan and each procedure.

S Resolution: Clarification is being requested from FEMA.  
(See Note Below)

A.1.c. C Comment: Block diagram not present.

C Resolution: This block diagram is available and will be presented in the next revision to the plan.

Note: Where a request for a clarification is indicated in this document, such requests are being made by the N.Y.S. Nuclear Emergency Planning Group.

A.1.d. C Comment: Same comment as A.1.a.

A.1.d. S Comment: Phone numbers and titles of individuals in charge and backups should be included. This may be incorporated into a separate booklet, since certain phone numbers are sensitive.

C Resolution: Same response as for A.1.a. All assignments of responsibilities will be made by title in the next revision.

S Resolution: Lists are available for inspection by responsible reviewers. They will not, however, be made public and are confidential.

A.2.a. C Comment: Key individuals by title are not always specified. Table III-1 is missing except in Wayne and Monroe County plans.

A.2.a. S Comment: Each organization shall specify a key individual title.

C Resolution: Table III-1 is available and will be present in the next revision and individual titles will be specified.

S Resolution: Key individuals have been specified by title where appropriate (Refer to page NM-16). The tables for the Indian Point Site specific section are now available and shall be included in the next revision.

A.2.b S Comment: Legal issues yet to be resolved.

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S Resolution: Although clarification may be desirable, existing

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Executive Law Article 2-B provides a framework for resolution of these issues. State plans will be written accordingly until such time as new legislation is passed.

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A.3. C Comment: Not present. Once the roles of the State and the counties are clarified, these roles must be clearly specified in written agreements. Also, agreements with non-public support organization, such as his companies and their unions, must be included.

A.3. S Comment: No agreements or memorandums of understanding are included in the plan.

\* Resolution: The State and the Counties will review with FEMA which agreements are deemed necessary. It is anticipated that FEMA's assistance might be required to obtain certain agreements. See A.1.b.

C. Emergency Response Support and Resources

C.1.a. S Comment: Assistance is now requested through the Federal Radiological and Assessment Plan. Reference to RAP/IRAP should be deleted. Furthermore, IRAP is replaced by the National Radiological Emergency Preparedness and Response Plan for commercial nuclear power plant accidents (Master Plan - 12/23/80 in Federal Register). Also, who in the DOH will notify FR&AP?

S Resolution: 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 FEMA comment, the plan will be more specific regarding contact persons for federal radiological assistance. Further clarification is being requested from FEMA regarding RAP/IRAP. For the time being reference to RAP/IRAP will remain until notified of any change by Department of Energy. The next revision to the State Plan will include provision for identifying who will notify RAP/IRAP.

C.1.b. S Comment: Federal resources times of arrival should be included.

S Resolution: This comment will be discussed with the U.S. Department of Energy and times of arrival will be included as they are obtained.

C.1.c. C Comment: Should be better references between plan and procedures.

C.1.c. S Comment: A) Land lines appear to be the major communication system. Are these dedicated phone lines with separate trunks? If not, what are the alternatives if they are not available?

B) Unable to locate information concerning air fields, telecommunications, and radio frequencies available for use. A reference to air fields available and their capabilities is mandated by the reliance on Federal Agencies for aerial assessment. Discussion of radio frequencies is essential to assess ability for inter-agency communication.



C Resolution: In the next revision the present cross references will be moved to the table of contents. They will also be expanded to provide better references to the procedures. Air fields and radio frequencies, which are available to support the federal response, will be identified.

S Resolution: See resolution to County comment. The New York State Nuclear Emergency Hotline is a dedicated phone system which was installed at the Indian Point Site and is being installed at the FitzPatrick/Nine Mile Point Site, to be utilized for radiological emergencies only. A more detailed description of the system will be provided in the next revision. Clarification is being requested from FEMA as to specific federal requirements being mandated on a national basis at all reactor sites. Clarification from FEMA as to acceptable methods of operation will also be sought.

C.2.a. S Comment: Inadequate.

S Resolution: This criterion is addressed and representatives are designated in Appendix 1 page H-1. This will be more adequately cross referenced in the next revision.

C.3. S Comment: Any and all private radiological labs, their capabilities and response times should be included. Page III-36 lists only several agencies. Is the State lab the only facility in state other than Feds?

S Resolution: Laboratory lists are now available and will be present in the next revision. Private labs will not be used.

C.4. C Comment: Letters of agreement not present, particularly with respect to non-public support organizations.

C.4. S Comment: No letters or agreement with federal agencies and non-governmental organizations. The recognition that the Coast Guard, which as a part of its statutory duties, will be involved in any nuclear accident near a navigable waterway, must be addressed in the New York State Plan, as the nuclear plants are all adjacent to navigable waters. An agreement with the Coast Guard is necessary and, in particular, the plan must identify who in the DOH contacts the Coast Guard and to which Coast Guard Office he directs his notification. In addition, who will notify the Railroads

C Resolution: Same as for Resolution A.3.

S Resolution: See resolution for county comment.

Notification of railroads is under review and shall be appropriately addressed.

E. Notification Methods and Procedures

E.1. S Comment: Specify title of person notifying and being notified within the agencies listed on pp. III 28-30. What are the means for verification of messages?

S Resolution: Titles of designated personnel will be included in the next revision. Notification is accomplished through a dedicated and secured communications link and therefore, it is believed that no verification is necessary.



E.5. C Comment: Need better indication as to how information will be disseminated.

C Resolution: Appendix G of the county plans indicates an intention to utilize the Emergency Broadcast System as the principal means for dissemination of information. This appendix contains a site-specific systems description and lists all station facilities and frequencies. Appropriate language will be added to Section III.D. 2. c. to provide better indication of this method.

E.6. C Comment: A more complete set of prepared messages are needed which would insure that news announcements for various sets of conditions are readily available.

E.6. S Comment: In the event a accident occurred today, describe the administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway.

C Resolution: That portion of Appendix B entitled "Warning Notices" will be expanded to include a separate emergency message for the Alert, Site Area Emergency and General Emergency classifications. These messages will be capable of addressing accident scenarios within each classification.

S Resolution: This detail is now being written and shall be present in the next revision.

E.7. C Comment: Same comment as above.

E.7. S Comment: Does not include respiratory protection.

C Resolution: Same response as above. The information contained in this criterion will be addressed in the new warning notices.

S Resolution: Respiratory protection as required by federal criteria will be described in the next revision.

F. Emergency Communications

F.1.c. \*Comment: Communications ties with Federal agencies must be specified, particularly the Coast Guard.

\* Resolution: Under the New York State concept of emergency operations, it would be the State's responsibility to communicate with Federal agencies. We have been advised that formal links between the State and Federal agencies are now being solidified. They shall be described in the next revision. Appropriate telephone numbers will be included in Procedure No. 1 in each county plan for the next revision.

F.1.d. C Comment: Means for communicating with radiological monitoring teams in the field must be specified.

C Resolution: Existing communications systems are presently being reviewed. This criterion will be more specifically addressed in the next revision.

- F.2. C Comment: No provision for communications with mobile medical support facilities.
- F.2. S Comment: Can not locate any mention of a coordinated communication link for fixed and mobile medical support facilities. Who is on the DOH emergency medical services?

C Resolution: Presently, Appendix F of Westchester, Rockland and Putnam Counties REPP's indicate coordinated communication links between mobile medical units and stationary facilities. It has been discerned that the same capability exists in the remaining counties. This will be indicated and more fully cross referenced in the next revision.

S Resolution: See resolution for county comment. The State plan shall reference the county plans. The next revision to the State plan will indicate who is on the DOH emergency medical services.

G. Public Education and Information

- G.1 \* Comment: What are specific educational plans? How will information be disseminated? What state individual is responsible for the educational program? Topics in G.1. are not addressed. What type of program is Parsons preparing for the utilities?

\* Resolution: The public education program is being developed jointly by State, local and utility resources. A brochure and telephone book ads will be developed for each county. This system will be specifically addressed and procedures written for the next revision. In addition, the next revision will identify the State individual responsible for the educational program.

G.2 \* Comment: Same comment as above.

\* Resolution: Same as for Resolution G.1

G.4.b. C Comment: Must be more specific on communications system and procedures necessary to achieve coordination.

C Resolution: Presently, Section III.D.2.c. of each county plan provides for a near-site emergency news center at which space will be provided for local, state and federal spokespersons. This provides person-to-person exchange of information. This section will be expanded to indicate that prior to activation of the center the county public information officers will maintain communication with New York State and contiguous county public information personnel through predesignated communications channels.

G.4.c. C Comment: This criteria is not listed in the cross-reference index and does not appear in section dealing with public information.

C Resolution: An additional Section, III.D.2.d, will be added to each county plan to address rumor control, and this section will be included in the cross-reference index.

G.5. S Comment: Plan must address an annual program for the news media.

S Resolution: An annual program for the news media is being developed and shall be addressed in the next revision.

H.7      \* Comment:      During the first few hours of a release, the State and local organizations must perform any needed field monitoring without federal assistance. The plan must discuss the adequacy of calibrations, security from damage, accessibility to monitoring teams, or ability to measure potential principle exposure pathways. In addition, DOH states it will provide "\_\_\_\_\_ limited manpower capability with the appropriate equipment." How limited? For how long? With what equipment? Will it be adequate?

C Resolution:      The next revision of the county plans will include the following additional information:

- Appendix L will include a listing of the contents of radiological emergency kits.
- The appropriate procedure will indicate the number of monitoring teams being trained in each county and the names and phone numbers of team supervisors.
- The State of New York is now calibrating some Civil Defense instrumentation. Instrumentation which has been provided by the utility is presently being calibrated by the utility. This will be indicated in the appropriate Radiological Equipment Inventory Calibration and Maintenance procedures.

S Resolution: The field monitoring system for the State is being developed and will be described in the next revision.

H.10. C Comment: No reference to this criterion was found.

H.10. S Comment: Inventory/quarterly not mentioned.

C Resolution: Inventory/quarterly and calibration/manufacturers recommendations is mentioned in each Radiological Equipment Inventory Calibration and Maintenance procedure in Section 3.2 of that procedure. This procedure will be expanded to indicate that each piece of equipment removed for calibration or maintenance will be replaced upon removal.

S Resolution: Inventory/quarterly checks are now included and will be described in the next revision.

I. Accident Assessment

I.7 \* Comment: While plan states that resources are limited, it does not describe what resources and capabilities currently exist. Described on pages III 34-37. However, larger equipment such as portable gamma spectrum analyzers, stationary field monitoring equipment, or mobile vans with monitoring equipment may be available through state and local organizations and if so, should be identified by listing or reference to county plan. Will the Brookhaven FR&AP team be able to assist soon enough in emergency? What equipment is available for food, milk, and water monitoring?



C Resolution: In addition to the information provided under criterion H.7, assessment capabilities provided to the counties surrounding Indian Point pursuant to the Apple computers and MIDAS will be described in Appendix L of the respective county plans. In addition, we will indicate that trained county personnel (all counties) will be permitted to accompany the Nuclear Facility Operator's Nuclear Environmental Monitoring teams during emergencies. All resources identified will be included in the next revision to the plan.

S Resolution: Refer to resolution to county comment. The State of New York has also been provided access to MIDAS information for the Indian Point site. In addition accident assessment details and program issues are now being developed. This program relates to the field monitoring system mentioned under criterion H.7 (including food, milk, and water monitoring) which shall be described in the next revision.

- a) What arrangements have been made to notify field monitoring teams at home? How do the teams get to the site? How do they obtain their equipment? What are their communication arrangements with the EOC? What are their estimated deployment times?
- b) What is the composition of the NFO field teams? Is the NFO aware that its field monitoring teams will be used to provide information to the State? Have all the NFO's in the State agreed to provide field monitoring teams or just the Indian Point NGS? If just IP, what arrangements have been made at the other NFO's? Will the NFO's have sufficient personnel to cope with both the emergency and the field monitoring? Are off-shift personnel to be used? If so, how are they notified?
- c) What, if any, fixed monitoring stations are available? Have monitoring locations been site-selected?

C Resolution: Monitoring team composition and notification will be more clearly specified in the appropriate procedures in the next revision. Team members will be notified by commercial telephone and will provide their own transportation to equipment pick-up points and/or team assembly areas. Nine Mile Point and James A. Fitzpatrick have both agreed to provide field monitoring teams. Fixed monitoring stations have been site-selected and specified on Fig. L-1 in each county plan.

S Resolution: Refer to resolution to county comment and to criteria I.7. and F.1.d.

I.9. S Comment: Plan states New York does not have airborne I. detection capability. -

S Resolution: This statement remains correct. Until this capability is developed the State of New York will rely on utility and Federal resources. This will be discussed with FEMA.

I.10. S Comment: The State does not have its own procedure, but merely references R.G. 1.109 as the method to be followed. The State must develop its own procedures, patterned after 1.109, if so desired ( a quick and easy method of assessment should be used in the heat of battle).

S Resolution: These procedures are under development and shall be present in the next revision. The reference to Nureg 1.109 should be changed to regulatory guide 1.109.

I.11. S Comment: "Arrangement being made", therefore, unacceptable at this time.

S Resolution: These arrangements are still under development and shall be described in the next revision. The DOE RAP team will be depended upon for aerial monitoring.

J. Protective Response

J.2 \* Comment: Not yet incorporated into Plan.

\* Resolution: This will be incorporated into all county plans and the State plan for the next revision.

J.9 \* Comment: Determination of protection actions not possible without I.10. Capability to conduct sampling (ground and/or aerial surveillance) has not been established. Who will do this? What measures are being considered to ensure that the response(s) is (are) actually viable?

C Resolution: It is the belief of all involved counties that the criterion is addressed specifically in their plans. Refer to Sections III.G.2, III.H, Tables III-2,3,4 & 5 and implementation Procedure No. 3. The training procedures indicate a need to provide training in the areas of accident assessment and evaluation. Sampling is considered to be the responsibility of NYS DOH and, Ag. and Markets.

S Resolution: Reference resolution to criterion I.10. Procedures are being developed and shall be included in the next revision. Drills will ensure that these measures are viable.

J.10.a \* Comment: Maps missing or are incomplete.

\* Resolution: Maps are available and will be present and complete in next revision.

J.10.c C Comment: Appendix G must be updated to reflect change in NUREG-0654 (notification time). While Appendix G discuss options, actual plans and procedures have not yet been established.

J.10.c S Comment: In the event an accident occurred today, how will the population in the plume exposure pathway be notified?

C Resolution: Appendix G will be updated and will specifically address siren and tone alert systems which will be implemented. Descriptions will include activation procedures. Until the notification systems are installed, local, fire, police and ambulance sirens and public address systems will be used.

S Refer to response to county comment. These descriptions will be included in the next revision of the State plan.

J.10.d S Comment: Currently under development.

S Resolution: This shall be completed and included in the next revision of the State plan. The State plan shall also reference the county plan.

J.10.e

J.10.f C Comment: Use of radioprotective drugs not discussed. FDA has indicated that this is a State decision and any policy regarding this is at the discretion of the DOH.

J.10.e

J.10.f S Comment: FDA has indicated that this is a State decision any policy regarding this is at the discretion of the DOH.

C Resolution: The use of radioprotective drugs is addressed for emergency workers within the Indian Point site counties. Appendix D will be changed to reflect this. The Oswego County R.E.R.P. provides for the use of the drugs for the general public.

S Resolution: State policy on the use of these drugs is still being developed. Appropriate documentation shall be included or referenced in the next revision.

J.10.g \* Comment: Agreements with private and public carriers and their unions must be obtained.

\* Resolution: Same as resolution for A.3.

J.10.h C Comment: But still incomplete in some counties.

J.10.h S Comment: Being developed.

C Resolution: This information is available and will be present in the next revision.

S Resolution: Will be completed and included in the next revision.

J.10.i \* Comment: Still not complete.

\* Resolution: Projected traffic capacities are available and will be present in next revision.

J.10.k S Comment: Being developed.

S Resolution: These details shall be completed and included in the next revision.



J.10.1 S Comment: Information missing.

S Resolution: Time estimates are now available and shall be included in the next revision.

J.10.m S Comment: Flow chart is good, however, it is not clear how the critical decisions at 4 and 6 are to be made, i.e., shelter vs. evacuate.

S Resolution: More specificity shall be included in the next revision.

J.11 S Comment: Information missing.

S Resolution: This criterion shall be more adequately cross referenced and missing information shall be included in the next revision. Procedures for protective measures for the ingestion pathway EPZ will be developed by the Department of Health, in coordination with other appropriate State agencies.

J.12 C Comment: No provision for registering and monitoring evacuees.

J.12 S Comment: This is referenced as "Local Responsibility." Is that the agreement between State and locals? If so, there is a problem, because the county plans do not reference this element.

\* Resolution: Clarification is being requested as to why registration is necessary. If necessary a registration form will be developed and included in the next revision. Evacuee monitoring and decontamination will take place at one reception center per county by personnel trained in these activities. This will be addressed in the next revision.

K. Radiological Exposure Control

K.3.a. \* Comment: Where is the program for permanent record devices (i.e., film badges, TLD)? Appendix G, 3-2 assigns each agency's radiological liaison to obtain and prepare records. Are there procedures for this? Do the TLD's exist? How are the appropriate personnel to obtain their equipment on a 24 hour/day basis?

C Resolution: Film badges and/or TLD's will be provided to each county. A procedure for obtaining equipment and dose records is contained in Procedure No. 3 of each county plan. This procedure also contains dose records to be used by county personnel. This procedure will be supplemented by training. Clarification is being requested as to how much detail is being required on a national basis at all reactor sites.

S Resolution: Refer to response to county comment. Details and procedures are being developed for State plan and will be included in the next revision. Clarification is being requested as to how much detail is required.

K.3.b. \* Comment: This responsibility is assigned to each agency's radiological liaison or field supervisor? Have these people been trained and assigned?

\* Resolution: These people will be assigned and listed in the appropriate procedure for the next revision. They will be trained before an exercise is conducted.

- K.4     C Comment:     Until respective roles of State and Counties are resolved, there would be a potential conflict between orders given by State Commissioner of Health and responsible person designated in county plans.
- S Comment:     The final decision maker is the State Commissioner of Health? Who are the other members of the decision chain?
- C Resolution:    Though the potential for conflict exists, this criterion is addressed in Procedure No. 3 of each county plan and the required decision chain is set up. See resolution for A.1.a.
- S Resolution:    Refer to response to county comment, and to resolutions to criterion A.1.a.
- K.5.a. \* Comment:     The specified action levels are unacceptable because they are too high.
- \* Resolution:    This will be corrected in the next revision. Clarification is being requested as to why this applies to State plan.
- K.5.b. \* Comment:     Where are the PMC's, where are central supplies stored and how will they be stocked?
- \* Resolution:    Personnel Monitoring Centers may be established at each county's emergency operations center which is also where central supplies are stored. This is still under investigation and will be addressed in the next revision. New York State will identify two locations per site for State personnel, in the next revision.

L. Medical and Public Health Support

L.1 C Comment: No list of hospitals was found, but Congregate Care Center information is provided. While the centers are to care for contaminated persons, the minimum criteria are lacking and County Health Department input is lacking.

S Comment: The State plans still does not describe arrangements for local and backup hospital services and the capability for evaluation of radiation exposure. The Hospital Association of New York State has requested a list of hospitals and special radiological capability. It "is forthcoming."

C Resolution: This criteria is specifically addressed in the Oswego County RERP Procedure Nos. 3 and 8. Other county RERP's will be updated to indicate arrangements for local and backup hospitals. This material shall be included in the next revision.

S Resolution: This information will be included in the appropriate site-specific section of the State plan for the next revision.

L.3- S Comment: Same as L.1.

S Resolution: Same resolution as above.

L.4 C Comment: Attachment 8 - Guidelines for Treatment and Transportation of Potentially Contaminated Injured People is blank. Also, formal agreements are needed with carriers and their unions.

S Comment: Arrangements are still not indicated for transporting victims of radiological accidents to medical support facilities. Arrangements are needed.

C Resolution: Where it is blank, the attachment will be completed for the next revision. Treatment of potentially contaminated injured people is presently addressed in Procedure No. 3 of each county RERP. Also, see response for A.3.

S Resolution: EMS program is under review and shall be addressed in the next revision. Refer to response to criterion A.3.

M. Recovery and Reentry Planning and  
Postaccident Operations

M.1 C Comment: Specific procedures that address decisions to relax protective measures are missing.

S Comment: What levels and procedures are used in the decision-making?

C Resolution: Section IV of each County Plan discusses the means for deciding to relax protective measures. Attachment No. 1 to each implementation procedure provides procedures for reentry to an evacuated area. More clarification is needed as to the requirements to satisfy this criterion. This will be resolved with NYS N.E.P.G. Clarification is being requested as to how much detail is required.

S Resolution: Procedures are being developed and shall be included in the next revision.

- M.3 S Comment: Plan states the ODP will appoint a committee to make recovery decision. What state agencies and representatives will be sitting on this committee?
- S Resolution: This is a Disaster Preparedness Commission responsibility. The State radiological plan shall reference the New York State Disaster Preparedness Plan.
- M.4 S Comment: Plan states that a long term monitoring program will be established. Please elaborate.
- S Resolution: Elaboration will be provided in the next revision describing the long term monitoring program.
- N. Exercises and Drills
- N.1.b. C Comment: No provision for exercise once every six years between 6:00 pm and midnight and midnight and 6:00 am.
- C Resolution: This will be incorporated in the next revision.
- N.2.a. C Comment: Except for Putnam, Oswego, Monroe and Wayne Counties, which have no specific procedures for exercises and drills.
- C Resolution: Procedures for Putnam and Oswego are available and will be present in the next revision.
- N.2.c.
- N.2.d. C Comment: Same as N.2.a.
- C Resolution: Same as resolution to N.2.a.
- N.2.e S Comment: Semi-annual health physics drill not mentioned.
- S Resolution: Clarification is being requested as to the requirements of this criterion.



N.3.a.-

N.3.f. C Comment: Not yet present.

C Resolution: Clarification is being requested. Attachment 6 of each county Drills and Exercise procedure addresses some of these criteria. We question the necessity for specifying further details in a plan. More detailed and specific exercise scenarios are being developed by the State, utilities and counties. These will be included or referenced in the next revision.

O. Radiological Response Training

O.1.b. C Comment: Except for Putnam, Monroe and Wayne Counties which have no specific procedures for training.

C Resolution: A training procedure for Putnam County is available and will be presented in the next revision.

O.4.a.-

O.4.j \* Comment: Plans and procedures not specific enough. They do not list specific type of training needed, as in criteria. Also "should be trained" must be changed to "shall be trained."

C Resolution: More Clarification is being requested. The present training procedure (Section 4.3 and 4.4) addresses each type of training as listed in criteria. This procedure will be expanded to include training offered by the State of New York. As training programs are implemented additions to this procedure will be made.

S Resolution: Appropriate titles of individuals to be trained and the type of training they are to receive will be included in the next revision.

P. Responsibility For The Planning Effort: Development Periodic Review and Distribution of Emergency Plans

- P.1 C Comment: Section II-B.5. not specific enough.
- S Comment: Specific titles of individuals responsible for the planning effort should be listed.
- C Resolution: This information is located in the county training procedures. This criterion will be more specifically addressed, in the respective county procedures, in the next revision.
- S Resolution: Clarification is being requested. It is felt that this criterion is specifically addressed in App. 1.F.
- P.3. S Comment: Who in the DOH?
- S Resolution: The Emergency Planning Coordinator for the New York State Department of Health will be designated in the next revision.
- P.4 C Comment: Except for Putnam, Monroe and Wayne Counties which have no procedures for document control and revision.
- C Resolution: A document control and revision procedure for Putnam County is available and will be presented in the next revision.

- P.5     C Comment:     Same as P.4.
- C Resolution:   Same as resolution to P.4.
- P.7     C Comment:     Same as P.4.
- C Resolution:   Same as resolution to P.4.
- P.8     C Comment:     Must list implementing procedures in Table of  
                         Contents and improve page numbering system.
- C Resolution:   This comment will be satisfied in next  
                         revision.
- P.10    C Comment:     This criterion was not listed in draft  
                         NUREG-0654.
- P.10    S Comment:     Emergency telephone numbers must be updated  
                         quarterly.
- \* Resolution:   This criterion will be incorporated in next  
                         revision.