

8 Oceanwood Drive
Duxbury, Ma 02332
March 8, 1994

Chairman Ivan Selin
USNRC
Washington D.C.

Chairman Selin,

I was unaware the NRC had suffered such severe financial reversals since you have taken office. Now that I have been informed of your financial difficulties I feel it is my duty to lend a helping hand. Enclosed please find my personal check for \$10.00. I did check with the phone company and learned that a call from my home to your agency would cost 16cents per minute. Your staff kept me on hold for 45 minutes which would equal \$7.20 considered the extra \$2.80 a contribution toward additional expenses. (Perhaps stamps for thank you notes)

Now that this matter is taken care of perhaps we could deal with the issue at hand.

See Pg 7-8-9

PILGRIM DOES NOT HAVE A RECEPTION CENTER TO THE NORTH.

We have not had an adequate staff since ^{Dec.} ~~Feb~~ 1, 1993 as state documents have shown.

1. The MEMA staffing report, which includes more than half the staff highway dept. workers.

23-30

2. The letter from the Highway Dept General Council to BECo, stating that as of Dec. the Highway Dept. personnel would no longer be available and that BECo had best find their own staff.

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These letters are and have been in the hands of the NRC for sometime now. As a matter of fact they were sent to me by Jim Partlow when he was working on my 2.206.
(Unfortunately you people choose to ignore Jim's work)

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Equipment:

It is my understanding from two reliable sources that the equipment left Wellesley thru out Dec. and Jan. and is now at South Weymouth Naval Base.

My fear is that the statements on page 3 of 3 of the Edison status report maybe be less than accurate. Perhaps they are "statements that need to be qualified" If they are correct and there are indeed three "spare" portal monitors about 1 strongly suggest the "spares" are sent immediately to the South Weymouth Naval Base to bring the total of monitor up to six. Six monitors will be able to monitor 180 people in one hour, 2160 people in 12 hours. I remind you Duxbury's

School population alone is over 3000, the Town's population is over 14,000. The figures are not inclusive of Marshfield, who will also be using the reception center. My figures are based on the "Carr/Fleming standard" of 2 minutes set in 1989. FEMA attempted to set a new standard in the 1991 exercise but the people monitoring were so untrained for the task they could not monitor 10 people to set a standard. As you know, since we had no reception center in Dec of 1993 it was not tested in that exercise.

I toured the base on Saturday and have the highest hopes that eventually we may for the first time have a staffed reception center. If we insist that the BECO "stated six" monitors are all at South Weymouth we still are far shy of the mandated 12 hour monitoring needs but the people of the EPZ will have a chance. You owe us that much.

According to the NRC 50-293/94-01 report Pilgrim is operating outside of "Design Basis" in almost every area. You are playing Russian Roulette with the people of this area at least give us a Reception Center. As I explained you had a chance to regulate with my 2.206. Had you set the clock on just the Reception Center the NRC would have been operating within their own regulations without disrupting the utilities declared timeline. Now you are out of regulations as well as the Utility. I do hold you personally responsible, I have personally informed you of the situation and as Chairman of the NRC you do have the power to correct the problem. Stop the personal games, I am not the issue, PUBLIC HEALTH and Safety is the issue.

Sincerely,


Jane A Fleming

cc

President Clinton
David Williams
Sen. Kennedy
Sen. Kerry
Sen. Lieberman
Sen. Robert Dole
Sen. John Glenn
Sen. Nancy Kassebaum
Sen. Carl Levin
Sen. Claiborne Pell
Sen. Jesse Helms
Sen. Moynihan
Sen. Graham
Sen. Metzenbaum
Sen. Wofford, Sen. Boxer, Sen. Warner

8 Oceanwood Drive
Duxbury, Ma 02332
Jan.18, 1994

President William Clinton
White House
Washington D.C.
FAX# 202 456 2461

Mister President,

I would appreciate your support in assuring the health and safety of the public. Emergency Planning for Nuclear Power Plants, unlike the natural disasters you must deal with, have a definite form and substance. The Federal Regulations (10 CFR 50:47) and guidelines (NUREG 6.34) were developed following TMI. The premise underlying the regulations is quite simple. Get the people out and get them monitored. Monitoring takes place at reception centers. The functions of a reception center is to ; monitor for radiation, decontaminate if necessary and family reunification.

Currently a portion of the population around Pilgrim and Seabrook Nuclear Power Stations are without a functioning reception center. The NRC has been aware of this pending problem since Sept.16, 1992. They were aware the reception center was not adequately staffed Mar.2, 1993 and they have been aware that the entire State staff would be dispersed in Dec. of 1993, as early as June of 1993. It is now Jan 1994 and the NRC is justifying the adequacy of this reception center by referring to documentation that was developed in Sept. of 1991 and released by FEMA in Dec. of 1992. Three months after Governor William Weld announced the pending sale of the facility. The State, FEMA and the NRC hopes to have a new facility by April of 1994. In the mean time Federal Regulations and guidelines are not being comported with and the public is placed in a position of unnecessary risk.

I hope you can lend your authority to this current situation and perhaps in your selection of Commissioners to the NRC, you will appoint people who realize Emergency Planning is the public last and only line of defense. This issue deserves a realistic and factual review by the Commission.

The attached letter has been faxed to the Nuclear Regulatory Commission, today, Jan.18,1994.

Thank You for your time and your support.

Sincerely,

Jane A. Fleming

8 Oceanwood Drive
Duxbury,ma.02332
Jan. 18, 1994

The Chairman and Commissioners
USNRC
Washington D.C. 20555

To The Commissioners;

Today January 18, 1994 Pilgrim Nuclear Power Station does not have an adequately staffed and functioning reception center to the North. You are knowingly allowing Pilgrim and Seabrook to operate in violation of 10 CFR 50:47 B.8. and out of compliance with NUREG 0654 J.12.

Today, my families health and safety and that of the entire Duxbury and Marshfield EPZ population, as well as portions of the Seabrook EPZ population, are at risk. Unnecessarily!

I expect a response today. I will not accept outdated information. I expect the Commission to find a speedy remedy to this problem. My number is 617-934-7451 I am awaiting your call, today.

The games have ended!

Sincerely,

Jane A. Fleming
Jane A. Fleming

c.c.
President Clinton

9403210254

Feb. 4, 1994

Chairman Selin,

The "responsiveness" "rap" holds, but let me clarify it. You do not have to respond to me personally, this isn't an ego thing, but as Chairman of the NRC you do have to respond to my issues. The fact the Pilgrim EPZ at this moment has no reception center to the North is a very serious and valid issue. It is clearly a violation of 10 CFR 50.47 B 8. It is, I assume, part of your oath of office to uphold the pertinent regulations. Public Health and Safety are being threatened at this moment. If there is an accident at Pilgrim or Seabrook, portions of the public are without the mandated reception center,

In your note you state there was a full review and hearing of my complaint (2.206 Petition) Dr. Thomas Murley and I determined that was not the case. The decision seemingly overlooked two years of work performed by Jim Partlow. The Director has agreed to reopen three major issues; the Wellesley Reception Center, the lack of comportment with NUREG 0654 A.3., and the utilities inability to develop an accurate and timely PAR. Indeed you played an active part in enveloping the latter two issues that the Director's decision overlooked.

I agree, my original access to the former Chairman and Commission was unprecedented, I understand that I was the first member of the public to have a private appointment with the Chairman of the NRC. Again, this is not a personal thing. The issues I brought to Chairman Carr were valid. My desire to improve emergency planning was recognized and my willingness to learn and work through the system was appreciated. And my persistence paid off. I still attempt to work through the system, but, it has become increasingly difficult.

I am quite proud of the fact that I set precedence in allowing "mere" members of the public access to the Commission. After all it is the Public's Health and Safety you are mandated to protect. I know that my knowledge in the field of emergency preparedness, in particular, Pilgrim's emergency preparedness, lends me the confidence, to present accurate and timely information to the Commission. I assume other member of the public are equally knowledgeable in their fields.

The response Ron Eaton prepared for you was not responsive to the statement I made to you on Jan. 18, 1994. I will enclose the statement, again, for your consideration and remedy. Perhaps you could explain to Mr. Eaton that I am not looking for a status report of the transition of

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reception centers I am looking for a reception center existing today. I do have a simple remedy, that actually I am very surprised the Commission did not take. I will be glad to discuss it with you.

Sincerely,

Jane Fleming

1/28

Dear Jane

THE FLOWERS ARE BEAUTIFUL, AND I ENJOYED TALKING TO YOU ON C-SPAN. BUT THE "RESPONSIVENESS" RAP IS A BAD ONE. YOUR COMPLAINT/ REQUEST GOT A FULL REVIEW + HEARING, AND NOW CERTAINLY HAVE ENJOINED UNRESTRICTED ACCESS TO THE COMMISSION + THE STAFF.

Happy New Year

Ivan Selin

FEDERAL REGULATIONS, GUIDELINES AND ADJUDICATIONS
PERTAINING TO RECEPTION CENTERS

Federal Regulation:

10 CFR 50:47 (b) (8) Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

10 CFR 50:47 (b) (10) A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and for the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal Guidance, are developed and in place, and protective action for the ingestion exposure pathway EPZ to the locale have been developed.

NUREG 0654/FEMA-REP-1 J.12

Each organization shall describe the means for registering and monitoring of evacuees at the relocation centers in host areas. The personnel and equipment available shall be capable of monitoring within about a 12 hour period all residents and transients in the plume exposure area.

N.B. In Sept of 1988 J.12 was reinforced; the word "should" was replaced with shall, as highlighted above. Although 0654 is a guidance, not a regulation, this reinforcement of language may now make this an enforceable action.

Krimm's Memorandum dated Dec. 24, 1985 signed by Richard W. Krimm, FEMA. The memo was an internal FEMA memorandum. Its stated purpose was to provide "interpretive guidance" to NUREG 0654 J.12.. The memo determined that emergency preparedness plans should include trained personnel and equipment at relocation centers for monitoring a minimum of twenty percent of the population within the EPZ. (emergency planning zone)

Major cases litigating Krimm's Memorandum:

28 NRC 515 (1988) ALAB-905

In the matter of Long Island Lighting Company
(Shoreham) Nov. 29, 1988

30 NRC 331 (1989) ALAB-924

In the matter of Public Service Company of New Hampshire
(Seabrook) Nov. 7, 1989

DUXBURY'S SCHOOL POPULATION	Approximately 3,000
Duxbury's total population	Approximately 14,000
Marshfield's School population	Approximately 640*
*this is EPZ population only	

Practical Application of Krimm's Memorandum

Although, when litigated it was determined to be "without substance", the Krimm's Memorandum has been implemented by FEMA and supported by virtue of "negative consent" by the NRC. It is of interest to note that on June 29, 1989 Victor Stello EDO in a Memo to the Commission suggested for clarity, a rulemaking decision of the 20% monitoring of evacuees. No rulemaking has been forthcoming. The NRC is on record to be "in concept, in support of the monitoring of school children". This statement was made directly referring to the Pilgrim EPZ and the Duxbury School Population.

The Krimm's Memorandum has been implemented within many EPZ without regard to demographics or meteorological conditions. The population group most negatively impact by this is the school population who essentially have been skimmed out of the reception centers and sent to so-called Host School under the "precautionary transfer".

Using Pilgrim as an example allow me to explain the practical flaws within this system.

1. Meteorological factors: In 1989, Spengler and Keller (Harvard) performed a Wind Study for the Coastal Areas around Pilgrim in connection with the "Southeastern Massachusetts Health Study". On Oct. 12, 1989 I presented the Wind Study to Chairman Carr, NRC not only as it pertained to the Cancer Study, but also with the implications the rapidly changing coastal breezes would effect Emergency Planning (E.P.) The end result, the NRC accepted the premise of rapidly changing wind direction and determined that the entire school population of the EPZ should be evacuated simultaneously.

This rapid change in wind direction will effect the entire population and potentially result in a far larger exposure of the EPZ population than say, for example, a mid western plant with a constant wind direction. Planning in our coastal area must be prepared for the rapid shifts in wind direction and the potential exposure of the entire EPZ.

Demographics: When the Krimm's Memo is applied to a densely populated area it becomes apparent rapidly that finances are the major concern. Within the Pilgrim EPZ the school population alone exceeds the 20% cap that Krimm's capriciously developed. The Utility developed the concept of Host Schools. A "Host School" will register children and provide family reunification but offers no monitoring for potential contamination. Children are more vulnerable to the effects of radiation than adults. Yet, children are not considered in the planning process for reception centers.

Pilgrim states the children will be evacuated before there is a release.

Flaws in that statement

1. A release at a boiling water reactor can occur in 0 - 30 minutes. (NUREG0654)
2. There is at least a three hour delay built into the mobilization of school children.
3. Once a bus is enroute it can be exposed. A school bus offers less than 1% dose reduction.
4. If the bus is exposed the driver wears a dosimeter and will know. In the last three exercises the bus drivers displayed a complete lack of training in dosimetry.
5. Communications with buses have failed in each exercise.
6. In all three exercises especially Dec. 1991 the utility was unable to develop a complete and accurate protective action, they also did not receive the retraining the NRC staff recommended in the field of developing protective actions.

The list of potential human and mechanical failures is endless. Why risk our most vulnerable population group?

James Taylor
Executive Director of Operations
U.S.N.R.C.
Washington 20555

Dear Jim,

On Sept 15, 1992, The Boston Globe published the Governor's intention to consolidate the DPW and sell the Wellesley DPW garage. Oct. 1, 1992 was the target date to make this proposal official. The property has been appraised at \$28 million and the consolidation predicted a four year savings to be \$25 million. Needless to say, this has been a well received proposal in the State. The one flaw to the plan: the Wellesley DPW Garage is the Relocation Center for Pilgrim and Seabrook.

On Monday Sept. 21, 1992 I called David Rodham the Director of MEMA to check the validity of the newspaper story. He confirmed the facts while driving to the Wellesley DPW garage to attend the first of many meetings on this very topic.

On Sept. 24, 1992 I presented the preliminary information concerning this to Jim Partlow, NRR. By a chance meeting, I also informed Aby Mosheni of the the potential closing of Wellesley and ask him to pass this on to Bob Erickson. I followed this up the next morning with a call to Aby. Aby informed me Bob was "on travel, therefore he hadn't informed him. I then called Ebe McCabe, and discuss the Wellesley Reception Center Issue as well as other issues.

On Sept. 30, 1992 Craig Wingo of FEMA informed me, that he had just received documentation from Northeast Utilities that stated: the Governor's proposed sale of Wellesley DPW Garage was a rumor. Wingo felt the proposed sale was not going to happen, based on the Northeast Utility information, furthermore Bob Erickson was on his other line to discuss this. It was during this conversation with Wingo, FEMA, that I first became aware of the fact Seabrook would also be using Wellesley as a reception center. Ebe McCabe confirmed the statement concerning Seabrook. (This dual use brings in a myriad of new problems that I won't discuss now.)

I then contacted Dave Rodham, MEMA, to determine if the status had changed. David assured me that this proposal was indeed going forth. David further indicated that it was his sense that he would like to have a new reception center lined

up by Jan. 1, 1993.

With this seemingly conflicting information I contacted

up by Jan.1, 1993.

With this seemingly conflicting information I contacted the NRC through Secretary Chilk's office and the Chairman's office through Public Affairs. I informed both offices of the contradictory information, as well as my fear that once again, without any verification of the Utilities supposed "facts", a document of convenience would be accept as truth.. Both offices assured me they would pass this on to the appropriate people.

The next day, to reconfirm the facts Rodham presented to me, I started inquiries through out the state. From the Governor's office, the Secretary of Transportation, the Highway Dept. down to the "Right of Way" Dept. and the project manager, in charge of preparing of the property for sale. All agree that the proposal became official Oct. 1, 1992. The sense was the consolidation would take place over the next three months (leaving us without a set up staff) and the preparation for sale up to a year due to the toxic waste problems on site.

This information I relayed back to Ebe McCabe, his initial response concerned me. In essence he stated the the Utilities were obliged to report the truth to the NRC. I reminded him of my concern of a "convenient truth" rather than a "factual truth" to often has become the "accepted truth". After running through many quotable quotes, I reminded Ebe of one of my favorites: "If man does not learn from history, he is doomed to repeat it." I reminded Ebe the NRC has on too many occasions in the world of Emergency Planning accepted without verifying, the utilities "convenient truths".

My last call of the day was to you Jim, and after our traditional parry of who is ultimately responsible for emergency planning. As promised I have put my, what I as an individual, have been able to learn into writing.

Jim Partlow has my original documents, newspaper articles and a letter from the town manager.*

Ebe McCabe has the Secretary of Transportation's response (Sept. 28,1992) to Rodham and Groux. Essentially it states they are aware of the Reception Center, it is being considered but the Utilities are Tenants at Will. i.e. the State can throw them out when ever they choose.

Bottom line Jim, you are now in, as you described it, "a heads up situation". As I understand it Erickson and group have the alleged utility document. If its statements are as Craig Wingo has described them and if the are as unfounded as my questioning of the proper authorities seem to indicate; then, I would hope this document in question is

never entered into the files of planning with the potential of misleading staff members and perhaps once again the Commission. Secondly, I would expect the NRC to take the proper actions against the utility.

In summary, Jim, there are three key issues:

1. The consolidation of the DPW staff within three months leaving the reception center without a setup staff.
2. The ultimate sale of the DPW garage, leaving us without even a physical plant to use as a reception center.
3. The possibility Northeast Utility created a document of "convenient truth" with the intention of misleading Federal Agencies.

Sincerely,

Jane A. Fleming

* As an aside the town manager's letter has started round five in the School Committee and School Superintendents versus the non-elected town manager battle over monitoring of School Children. The School Committee holds firm: the children of Duxbury will be monitored whenever they are evacuated. Ofcourse we do need a reception center to accomplish this.

June 29, 1993

Mr. E. Thomas Boulette, Ph.D
 Senior Vice President - Nuclear
 Boston Edison Company
 Pilgrim Nuclear Power Station
 RFD #1 Rocky Hill Road
 Plymouth, Massachusetts 02360

Dear Mr. Boulette:

SUBJECT: REPLACEMENT FACILITY FOR THE WELLESLEY RECEPTION CENTER

Enclosed are three letters related to the impending loss of the Wellesley Reception Center (WRC), currently scheduled for December 1993. In the letter to Mr. Congel, dated June 9, 1993, the Federal Emergency Management Agency (FEMA) asked the U.S. Nuclear Regulatory Commission (NRC) to coordinate with you and the Seabrook licensee to provide whatever assistance is needed by the Massachusetts Emergency Management Agency (MEMA) to resolve the issues of a replacement facility before December 1993. I know your staff is working to effect a timely solution to this issue, and I would request that your staff provide me with a schedule of your progress to date, and monthly updates until the new reception center is functional.

I feel it is important to emphasize to you the concern we share with FEMA that an alternate reception center be identified, that trained personnel be available, and that appropriate plan and procedure changes be made at the time the WRC is no longer available.

Sincerely,

Original signed by:
 Ronald B. Eaton, Senior Project Manager
 Project Directorate I-3
 Division of Reactor Projects - I/II
 Office of Nuclear Reactor Regulation

Enclosures:

1. Ltr. 6/9/93 FEMA to NRC
2. Ltr. 6/8/93 FEMA to MEMA
3. Ltr. 4/27/93 MASS Highway
to BECO

cc w/enclosures:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

June 29, 1993

Docket No. 50-293

Mr. E. Thomas Boulette, Ph.D
Senior Vice President - Nuclear
Boston Edison Company
Pilgrim Nuclear Power Station
RTD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Dear Mr. Boulette:

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I feel it is important to emphasize to you the concern we share with FEMA that an alternate reception center be identified, that trained personnel be available, and that appropriate plan and procedure changes be made at the time the WRC is no longer available.

Sincerely,

Ronald B. Eaton, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Enclosures:

1. Ltr. 6/9/93 FEMA to NRC
2. Ltr. 6/8/93 FEMA to MEMA
3. Ltr. 4/27/93 MASS Highway
to BECO

cc w/enclosures:
See next page

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14

Mr. E. Thomas Boulette

cc:

Mr. Edward S. Kraft,
Vice President of Nuclear
Operations & Station Director
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Resident Inspector
U. S. Nuclear Regulatory Commission
Pilgrim Nuclear Power Station
Post Office Box 867
Plymouth, Massachusetts 02360

Chairman, Board of Selectmen
11 Lincoln Street
Plymouth, Massachusetts 02360

Office of the Commissioner
Massachusetts Department of
Environmental Protection
One Winter Street
Boston, Massachusetts 02108

Office of the Attorney General
One Ashburton Place
20th Floor
Boston, Massachusetts 02108

Mr. Robert M. Hallisey, Director
Radiation Control Program
Massachusetts Department of
Public Health
305 South Street
Boston, Massachusetts 02130

Regional Administrator, Region 1
U. S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, Pennsylvania 19406

Mr. Paul J. Hamilton
Licensing Division Manager
Boston Edison Company
25 Braintree Hill Park
Braintree, Massachusetts 02184

Pilgrim Nuclear Power Station

Mr. H. Vernon Oheim
Manager, Reg. Affairs Dept.
Pilgrim Nuclear Power Station
RFD #1 Rocky Hill Road
Plymouth, Massachusetts 02360

Mr. David F. Tarantino
Nuclear Information Manager
Pilgrim Nuclear Power Station
RFD #1, Rocky Hill Road
Plymouth, Massachusetts 02360

Mr. Thomas Rapone
Secretary of Public Safety
Executive Office of Public Safety
One Ashburton Place
Boston, Massachusetts 02108

Mr. David Rodham, Director
Massachusetts Emergency Management
Agency
400 Worcester Road
P.O. Box 1496
Framingham, Massachusetts 01701-0317
Attn: James Muckerheide

Chairmen, Citizens Urging
Responsible Energy
P. O. Box 2621
Duxbury, Massachusetts 02331

Citizens at Risk
P. O. Box 3803
Plymouth, Massachusetts 02361

W. S. Stowe, Esquire
Boston Edison Company
800 Boylston St., 36th Floor
Boston, Massachusetts 02199



Federal Emergency Management Agency

Washington, D.C. 20472

JUN 9 1993

Mr. Frank J. Congel, Director
Division of Radiation Safety
and Safeguards
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Congel:

We have received a copy of the enclosed April 27, 1993, letter from Edward J. Corcoran II, Chief Counsel to the Massachusetts Highway Department (MHD), to the Senior Vice President-Nuclear of the Boston Edison Company (BECO) informing BECO that "BECO's use of [the MHD maintenance facility in Wellesley] shall terminate as of December 31, 1993." The Wellesley MHD facility currently serves as the reception center for the communities of Duxbury and Marshfield in the event of an accident at the Pilgrim Nuclear Power Station and for the communities of Newbury and Newburyport in the event of an accident at the Seabrook Nuclear Power Station. We remain highly concerned with the Massachusetts Emergency Management Agency's (MEMA) efforts to identify a new reception center facility (or facilities) to replace the facility at Wellesley.

We have been aware for some time that MHD was considering selling or leasing its Wellesley maintenance facility as part of its consolidation and privatization plan. However, the December 31, 1993, termination of the agreement for the use of the Wellesley facility dictates that a suitable replacement facility for the Wellesley reception center be identified as soon as possible.

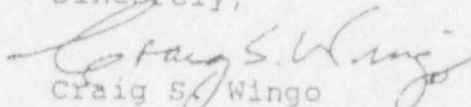
Enclosed is a copy of a June 8, 1993, letter from Richard W. Krimm, FEMA Deputy Associate Director for State and Local Programs and Support, to MEMA Director A. David Rodham regarding the imminent unavailability of the Wellesley facility, its impact on radiological emergency planning and preparedness at Pilgrim and Seabrook and the issues which need to be addressed.

FEMA would like NRC to coordinate with BECO and the North Atlantic Energy Service Corporation, the licensee for Seabrook, and ask the utilities to provide whatever assistance is needed by MEMA to resolve this issue before December 1993. FEMA is available at your convenience to discuss issues related to the identification of the new reception center(s).

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If you have any questions or concerns please feel free to contact me at (202) 646-3026 or Margaret Lawless of my staff at (202) 646-3027.

Sincerely,



Craig S. Wingo
Assistant Associate Director
Office of Technological Hazards

Enclosures



Federal Emergency Management Agency

Washington, D.C. 20472

JUN - 8 1993

Mr. A. David Rodham
Director
Massachusetts Emergency Management Agency
400 Worcester Road
P.O. Box 1496
Framingham, MA 01701-0317

Dear Mr. Rodham:

The Federal Emergency Management Agency (FEMA) has received a copy of the enclosed April 27, 1993, letter from Edward J. Corcoran II, Chief Counsel to the Massachusetts Highway Department (MHD), to the Senior Vice President-Nuclear of the Boston Edison Company (BECO) informing BECO that "BECO's use of [the MHD maintenance facility in Wellesley] shall terminate as of December 31, 1993." As you know, the Wellesley MHD facility currently serves as the reception center for the communities of Duxbury and Marshfield in the event of an accident at the Pilgrim Nuclear Power Station and for the communities of Newbury and Newburyport in the event of an accident at the Seabrook Nuclear Power Station. We remain highly concerned with the Massachusetts Emergency Management Agency's (MEMA) efforts to identify a new reception center facility (or facilities) to replace the facility at Wellesley.

We have been aware for some time that MHD was considering selling or leasing its Wellesley maintenance facility as part of its consolidation and privatization plan. However, the December 31, 1993, termination of the agreement for the use of the Wellesley facility dictates that a suitable replacement facility for the Wellesley reception center be identified as soon as possible. FEMA understands, through discussions with your staff, that MEMA is considering using two reception center facilities--one for the affected Seabrook communities and another for the affected Pilgrim towns--to replace the Wellesley MHD maintenance facility.

Changing reception centers will necessitate substantial plan changes to the Massachusetts Radiological Emergency Response Plan (MARERP) for Pilgrim and Seabrook. For example, plans and procedures, public information materials, emergency broadcast system messages and other documents such as traffic management manuals will have to be amended to address issues concerning the new reception center(s). In addition, a new evacuation time estimate study will have to be conducted for each site and its findings incorporated into the MARERP. New staff may have to be

identified, and the staff for the new reception center(s) will have to be trained on the set-up of the facility as well as on monitoring, decontamination and registration activities. Moreover, new congregate care centers and host schools may also have to be identified which would require additional plan and map changes. The revised planning documents must be submitted to FEMA for review and approval.

FEMA requests MEMA to develop and submit a plan with milestones established for accomplishing the necessary tasks to resolve the issues concerning the withdrawal of the Wellesley reception center as an available facility for radiological emergency preparedness purposes.

Given the critical importance of reception center functions in radiological emergency planning and preparedness, unless alternate reception center facilities and trained personnel are available at the time the Wellesley facility is no longer available, including appropriate plan and procedure changes, FEMA believes that this could affect the health and safety of the public residing in the Pilgrim emergency planning zone (EPZ) in the Massachusetts portion of the Seabrook EPZ in the event of a radiological emergency.

If planning and preparedness issues concerning the new reception center(s) are resolved by December 1993, FEMA requests that the new Pilgrim reception center be demonstrated as part of the 1993 Pilgrim exercise. If outstanding issues remain at the time that exercise is conducted, FEMA would like to see the new reception center demonstrated once those issues have been resolved. If there is a separate reception center facility for Seabrook, we would like to see that facility demonstrated as part of the 1994 Seabrook exercise. It is no longer useful to demonstrate the Wellesley reception center during the Pilgrim 1993 exercise because of the imminent unavailability of the MHD facility.

It should be noted that even at the present time staffing capabilities for the Wellesley facility are of major concern. The April 27, 1993, letter from Mr. Corcoran states that, "all MHD functions and employees will have been relocated from Wellesley by December," and that the MHD employees currently assigned to reception center functions will not be available to perform their duties at that time. It is FEMA's position that whenever sufficient trained MHD staff for the Wellesley facility are no longer available, alternate trained staff must be provided. FEMA requests MEMA to provide a schedule for the withdrawal of MHD personnel from their assigned responsibilities at the Wellesley reception center. Staffing rosters and training records for new personnel should be submitted to FEMA to document the availability of replacement staff for the MHD personnel.

FEMA is available at your convenience to discuss issues related to the identification of the new reception center(s) and the necessary plan modifications.

If you have any questions or concerns please feel free to contact me at (202) 646-3692 or Craig Wingo, Assistant Associate Director of the Office of Technological Hazards, at (202) 646-3026.

Sincerely,



Richard W. Krimm
Deputy Associate Director
State and Local Programs and Support

Enclosure



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

March 2, 1993

Ms. Jane Fleming
8 Oceanwood Drive
Duxbury, Massachusetts 02332

Dear Ms. Fleming:

This is a followup to the letter you received from Thomas E. Murley, Director, Office of Nuclear Reactor Regulation, dated November 17, 1992, in response to your letter to James M. Taylor, Executive Director of Operations, dated October 5, 1992. In your letter you raised two possible issues regarding the continued availability of the Wellesley Reception Center. We informed the Federal Emergency Management Agency (FEMA) of your concerns and asked that they consider them in their evaluation of radiological emergency preparedness in Massachusetts. The two possible issues were:

1. The consolidation of the Department of Public Works (DPW) staff within three months, leaving the reception center without a setup staff.
2. The ultimate sale of the DPW garage, resulting in no physical plant to use as a reception center.

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On December 22, 1992, FEMA issued its "Technical Assistance Review for Massachusetts State and Local Community Plans in Support of Seabrook Nuclear Power Station," which included an evaluation of the Wellesley Reception Center. FEMA evaluated the Wellesley Reception Center and determined that it meets applicable criteria in NUREG-0654/FEMA-REP-1 Revision 1. FEMA stated in its review that "according to the MARERP [Massachusetts Radiological Emergency Response Plan], MHD will provide staff and also manage the facility. Personnel from several organizations also staff the facility."

In light of the FEMA documented evaluation and the fact that the Massachusetts Emergency Management Agency officials are aware of the reliance of the Seabrook and Pilgrim emergency plans on the Wellesley Reception Center, we believe that the possible issues you raised have been duly considered and are not of concern for the foreseeable future.

Sincerely,

Robert A. Erickson, Chief
Emergency Preparedness Branch
Division of Radiation Safety
and Safeguards
Office of Nuclear Reactor Regulation

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William F. Weld
Governor

Armando Paul Calucci
Lieutenant Governor

James J. Kerasiotes
Secretary

Levinde T. Badingfield
Commissioner

April 27, 1993

CERTIFIED MAIL

Boston Edison Company
Senior Vice President - Nuclear
800 Boylston Street
Boston, MA 02119

Re: Notice to Terminate License Agreement
for Wellesley Maintenance Facility

Dear Sir:

This is to provide notice that the Massachusetts Highway Department (MHD), formerly known as the Massachusetts Department of Public Works, is exercising its right to terminate the license agreement between Boston Edison Company (BECO), the Division of Capital Planning and Operations, and the Department, dated October 6, 1989, for BECO's use of MHD's maintenance facility located in Wellesley. Notice is hereby given that BECO's use of said property shall terminate as of December 31, 1993.

The Department recognizes BECO's need to use the property for its national readiness test in December and hereby authorizes BECO's use of Wellesley for that purpose. BECO should be prepared to use its own personnel, as all MHD functions and employees will have been relocated from Wellesley by December.

The Department will assist in its efforts to identify new sites for reception centers. We also suggest that BECO explore some of the military facilities, including the National Guard site nearby the maintenance depot in Wellesley.

Massachusetts Highway Department

By Edward J. Corcoran II
Edward J. Corcoran II
Its Chief Counsel

cc: Director, Massachusetts Emergency Management Agency
Commissioner, Massachusetts Division of
Capital Planning and Operations