



Federal Emergency Management Agency

Washington, D.C. 20472

MAR 31 1982

MEMORANDUM FOR: Brian Grimes
Director
Division of Emergency Preparedness
U.S. Nuclear Regulatory Commission

FROM: *Harry D. Krimm*
Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological Hazards

SUBJECT: Interim Findings of Offsite Emergency Preparedness
for the Waterford Nuclear Power Plant (Louisiana)



Attached is a copy of the Federal Emergency Management Agency (FEMA) Region VI's A through P interim finding of the adequacy of State and local plans for offsite radiological emergency preparedness for the Waterford nuclear power plant.

Dates for corrective actions are to be established. The joint exercise is now scheduled for April 26, 1982.

The Region VI evaluation of the offsite emergency plans is that there are no serious deficiencies in either the plan or the State's capability to implement the plan.

Attachment
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Federal Emergency Management Agency

Region VI

Federal Center

Denton, Texas 76201

February 4, 1982

MEMORANDUM FOR ASSOCIATE DIRECTOR, STATE AND LOCAL PROGRAMS AND SUPPORT

ATTN: Vern Adler, Technological Hazards Division

FROM: *for* *S. L. Campbell*
Dell Greer, Acting Chief, Natural and Technological
Hazards Division

SUBJECT: Interim Findings

SITE: Waterford 3

STATE: Louisiana

BASIS FOR
FINDINGS: Plans as follow:

Enclosures 1 and 2 to Attachment 1 (Parish Plans for Waterford 3)

Annex J, Appendix 7 to Louisiana Preparedness Plan for Emergency
Operations, (State of Louisiana Peacetime Radiological Response
Plan, Revision 3, September 1981)

INTRODUCTION

The following description of the Waterford 3 site is extracted from Attachment 1:

Waterford 3 is located on the west (right descending) bank of the Mississippi River at River Mile 129.6 between Baton Rouge, Louisiana, and New Orleans, Louisiana. The site is the northwestern section of St. Charles Parish, Louisiana, between the towns of Killona and Taft, as shown in Figure 1-1.

The Waterford property is owned by Louisiana Power and Light Company (LP&L) and includes 3,561.3 acres. The plant area is about 48 acres and is defined as including the fenced-in area immediately adjacent to Waterford 3. The site includes only station structures, and will not include any residential, recreational, or other industrial structures. There are at present no plans for a visitor center or other recreational facilities either within the site or on the LP&L property.

The Mississippi River is the closest prominent natural feature to Waterford 3, while other important natural features include Lac des Allemands, about 5.5 miles southwest of the site, and Lake Ponchartrain, about 7 miles north-east of the site. The land slopes gently from its high points near the Mississippi (10-15 feet above mean sea level) to extensive wetlands located about 1.5 to 2.5 miles inland from the river.

Most of the man-made features are located on the narrow strip of dry land between the Mississippi River and the wetlands. Near the Waterford site are several large industrial facilities, including Waterford 1 and 2 (0.4 miles west-northwest of the site), Little Gypsy Steam Electric Station (0.8 miles north-northwest of the site and across the river from Waterford 3), Beker Industries, a fertilizer manufacturer (0.6 miles east-southeast), and Hooker Chemical Company (0.8 miles east-southeast).

Transportation facilities near the Waterford site include the Mississippi River (0.2 miles north-northeast of the site), Louisiana Highway 18 (0.1 miles north-northeast), Louisiana Highway 3127 (1.1 miles to the south-southwest of the site), Louisiana Highway 628 (0.7 miles north-northeast, across the river) and the Missouri-Pacific Railroad (0.5 miles south-southwest).

Major urban centers in the region of the site include New Orleans (approximately 25 miles east of the site) and Baton Rouge (approximately 50 miles west-northwest). Communities in St. Charles Parish near the site include Killona (0.9 miles west-northwest), Montz (1.0 miles north), Norco (1.9 miles east), and Hahnville (3.7 miles east-southeast). LaPlace (4.7 miles north) is located in St. John the Baptist Parish. Waterford 3 is located approximately 3 miles southeast of the St. John the Baptist Parish boundary.

Other prominent man-made features include the Mississippi River levee system which, at its closest point, is 0.1 miles from Waterford 3, and the Bonnet Carre Spillway, a flood control structure 1.3 miles east-northeast of the site.

The State of Louisiana, Department of Natural Resources, Office of Environmental Affairs, Nuclear Energy Division is the Office of Primary Responsibility for all off-site Radiological Emergency Preparedness Planning and for providing technical guidance and responding to accidents or incidents at a nuclear generating facility. Local site-specific Parish plans are developed by the affected Parishes in cooperation with and assisted by the Louisiana Nuclear Energy Division. Each Parish has submitted its plan to the Office of Primary Responsibility indicating they agree with the content of the plan and accept the plan as a document which provides for appropriate protective measures in the event of an accident/incident at Waterford 3. The State and Parishes were assisted by Energy Consultants, Inc., an Emergency Planning Service, in the development of off-site plans for Waterford 3.

All plans referenced in this report are on display for examination or copying at the FEMA Region VI Office in Denton, TX. (See Federal Register Notice (Docket No. FEMA-REP-6-LA-2) of December 30, 1981, Page #63125.))

The FEMA Region VI Regional Assistance Committee has reviewed the written off-site plans for Waterford 3 and submitted their comments to FEMA Region VI for consolidation. The following comments represent a condensed version of findings relative to NUREG-0654, FEMA-REP-1, Rev. 1.

EVALUATION

GENERAL:

The Louisiana State Plan for Peacetime Radiological Response was received, reviewed and exercised in accordance with 44 CFR, Part 350 for the Grand Gulf Nuclear Facility in Mississippi which impacts on Louisiana within the 10 mile Emergency Planning Zone. There were no serious deficiencies noted in either the plan nor the States' capability to implement the plan as written. Implementing procedures have not been incorporated as an integral part of the plan to date but have been provided for review and will be incorporated prior to FEMA Regional submission to FEMA Headquarters for final approval/disapproval.

Attachment 1 and Enclosures 1 and 2 thereto (site-specific Parish Plans) generally meet the NUREG-0654 planning criteria with the following comments being forwarded to the State/Local governments for consideration for incorporation prior to or immediately after exercising. Individual RAC member and FEMA comments from which this condensation is made is also being forwarded to the State/Local Governments and may be obtained from the FEMA Region VI REP Office.

Attachment A - Consolidated and condensed review of Louisiana State Plan by NUREG 0654 element.

Attachment B - Consolidated and condensed exercise evaluation comments relative to the Louisiana State plan as submitted to the State after exercising the Grand Gulf Facility.

Attachment C - Consolidated and condensed plan review/evaluation comments relative to Enclosures 1 and 2 of Attachment 1 (Waterford 3 site-specific plans for St. Charles and St. John the Baptist Parishes)

ATTACHMENT A

Consolidated and Condensed Review of
Louisiana State Plan by NUREG 0654 Element

CONSOLIDATED SYNOPSIS OF RAC COMMENTS
LOUISIANA PEACETIME RADIOLOGICAL RESPONSE PLAN

GENERAL COMMENTS

The Table of Contents of the State Plan should be expanded to show the various tables, tabs, and enclosures to tabs. This is important, as much of the important information is in these places and is difficult to locate. This is especially critical with Chapters 8 and 9.

State Plan contains both pg. 5-1 as well as its revision, pg. 5-1.

A. ASSIGNMENT OF RESPONSIBILITY

- 1.e. Twenty-four hour per day emergency response capability, including manning of communications.

Page 3-2 indicates at the state level, LNEP will provide coverage of the dedicated land-line telephone during normal office hours and the Louisiana State Police will provide coverage through an extension at other hours (as indicated during RAC meeting, a plan change is required since OEP has been added).

- 2.a. Functions and responsibility both primary and support.

Many functional assignments are made to organizational entities rather than to individuals by title as specified (e.g., in Section 7, III. A-D and V. D-F, etc.).

Section VI. A. 3. assigns responsibility to each "State Department" (again, not to an individual) to designate an individual, by title to be in charge of reemergency response. This step should be accomplished in the Plan rather than given as a responsibility to be accomplished.

3. Written agreements as needed with federal, state, and local support organizations.

The State Plan does not include letters of agreement nor a signature page where functions are covered by laws as is the case in the State of Louisiana.

Section VII, A.4. refers to the Federal Radiological Monitoring and Assessment Plan and to letters of agreement which outline specific Federal resources, etc., but the only agreement that has been executed is apparently between the State and utilities (Section 14). EPA is not listed among the organizations to support/implement the plan (Table 1). If EPA support is anticipated, a written instrument needs to be prepared which details specific EPA resources which are relied upon. Without such written instruments, EPA may not be able to justify the resources needed to maintain the necessary capability.

The Agreement should list any specific EPA resources relied upon and designate the channel(s) of communication to obtain the resources.

B. ONSITE EMERGENCY ORGANIZATION

2. Re utility's designated emergency coordinator who would initiate emergency actions.

While not a state or local function, off-site plans should indicate the utility's designated emergency coordinator who would initiate emergency actions.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

- 1.a. Specific person by title authorized to request federal assistance.

The assistant Secretary or his designated alternate of the Office of Environmental Affairs is listed as the authorized requestor but there should be an alternate named.

- 1.c. Specific State and local resources needed to support federal response.

Responsibilities are assigned (common) for implementing support responsibilities (VI, A.1.). Implementing procedures are required to be prepared (Section VIII, D.) but are not included in the plan. No specific provisions are made to support EPA, although FRMAP is relied upon (Section VII, A.4.). No airfields specified, no telephone lines or radio frequencies assigned, no telecommunications centers arranged for EPA.

3. Availability and capability of radiological laboratories.

Incomplete. The LNEC laboratory is adequately described in the plan. However, other laboratories, such as LSU and local laboratories, are briefly mentioned but no details are provided as to expected availability, or capability.

No specific mention is made of reliance upon EPA laboratory facilities, but such reliance is implied since laboratory support may be requested from DOE. The plan does not, but should, detail specifically what kinds of support may be needed, as well as "turnaround times" required. Requirements should be coordinated with laboratory capabilities, and letters of agreement should also be considered.

4. Availability of support from nuclear and other organizations.

Section VII. A. and B. (pages 36-37) of the plan describes support and resources available from Federal, State, and local agencies. However, letters of agreement are not presented. In particular, L.S.U. is indicated as an organization having a capability which might be used. There should, therefore, be a letter of agreement with the institution so noting the capability and its willingness to respond.

D. EMERGENCY CLASSIFICATION SYSTEM

3. An emergency classification system consistent with that of utility.

Chapter I of the State plan establishes emergency action levels consistent with NUREG-0654, Appendix 1. Assume they are consistent with licensee's.

E. NOTIFICATION METHODS AND PROCEDURES

1. Mutual agreeable procedures for notification of emergency response organizations.

Chapter 2 of the plan indicates the general concept for notifying response organizations of an accident at a nuclear facility including an accident notification from which requires verification. Paragraph III, N. page 2-3 indicates implementing procedures will contain detailed procedures for notifying the various affected entities. (Implementing procedures to be published.)

It is not at all clear from the Plan whether EPA assistance is anticipated. Reference is made to technical federal support (Section VIII, A.3. & 4.), so EPA would likely be involved in event federal support is ever requested. However, EPA is omitted from the distribution list for the state plan (Table 1). Implementing procedures which might detail such plans (Table 2) are omitted.

While notification procedures are outlined in Chapter 2, verification requirements are referenced to State and Parish Plan implementing procedures, which are missing. The only reference to verification requirements that could be found is the blank on Tab 1 of Chapter 2 in both plans and a space for noting verification is included on the "Accident Notification Form".

2. Procedures for alerting, notifying and mobilizing emergency response personnel.

Paragraph VI, A. 5. page 23 indicates each state department will be responsible for developing procedures for notification and mobilization of its personnel assigned emergency functions. NOT included in plan.

3. For licensee (emergency messages content).

The plan in Chapter 2, III. A.C., page 2-2 indicates forms for notification will be used. The accident notification form covers areas of consideration noted in criteria with exception of potentially affected population.

5. System for dissemination to public of appropriate information received from licensee.

Notification of the public initially and with following messages is thoroughly addressed. It may be advisable to designate a single source of information. Chapter 5, IV.B. 3. 5. and 6. appear to provide several spokespersons. This could lead to some confusion and perhaps some embarrassment. All those mentioned in the references may well take part in preparation of information but there should be a single source for clarity.

6. Procedures for notification and prompt instruction to the public in the plume exposure pathway.

Incomplete. A means for providing prompt instructions to the public is partially addressed. The state plan states that EBS messages for public protective actions are to be developed. However, the Tensas Parish Plan contains an EBS sheltering and evacuation message.

7. Prescribed written instructional messages for public in affected areas.

State plan references parish attachments which have prescribed messages as Tab 1 to Chapter 4 on pp. 4-4 and 4-5 (parish plan). However, the State plan also has a Tab 1 to its Chapter 4 which indicates EBS messages are to be developed.

F. EMERGENCY COMMUNICATIONS

- 1.a. An emergency response communications network with manning on a 24-hour basis.

Plan indicates in Chapter 3, III. A. 1. and 2. that dedicated phone circuits will serve as primary communications between the licensee and LNED with commercial telephone as the backup. This does not appear to meet the criteria in that if you lose the primary link you have also lost the secondary link.

- 1.c. Communications as appropriate with federal emergency response organizations.

LOEP will use NACOM land line and radio to communicate with FEMA with NAWAS being used as an alternate. Plan does not mention notification of other federal response organizations (DOE) if to be coordinated by FEMA, it should be so indicated and should be consistent with the utility scheme for notification.

- 1.d. Communications between nuclear facility and licensee's EOF, state/local EOC, and RAD monitoring teams.

Do not find provisions for communications between utility and field response teams. A communications schematic or block diagram would help in showing communications capability, systems and flow.

G. PUBLIC EDUCATION AND INFORMATION

- 3.a. Designated points of contact and physical locations for use by news media.

Inadequate. News media points of contact and specific media reception facilities are not identified. The plan merely says that facilities will be activated as necessary.

- 4.a. Designated media spokesperson with access to all necessary information.

LNED will designate a spokesperson to release state-wide information with parish governments designating spokespersons for releasing EPI to the parish populace. While the plan reads "spokespersons", it is suggested only one spokesperson being responsible for EPI news releases and this after coordination with spokesperson responsible for state-wide releases. A specific spokesperson is not identified by the state nor is any position (e.g., Public Information Officer).

H. EMERGENCY FACILITIES AND EQUIPMENT

3. Adequacy of emergency operating center.

Paragraph IV, H. and J., page 16 addresses the location and function of the State EOCs. Part N, p. 17 indicates each parish will activate and staff an EOC. Parish EOC here should be classified to read those parishes falling wholly or partially within the 10 mile EPZ.

4. Activation and staffing of EOCs and other facilities.

Timely activation and staffing of EOCs are to be addressed in the implementing procedures which are not included in the plan.

7. Provisions for offsite RAD monitoring equipment.

Chapter 6, Tab 3, enclosure 1 lists the needed equipment and the office where it is available. There is no indication, however, as to how readily the equipment can be made available. Some prior arrangements should be made, and reflected in the Plan, for having the equipment ready on short notice. Maintenance of "kits", or storage of some of the equipment in the mobile laboratory (Chapter 6, Tab 3, Item G.2) are two ways to maintain a state of readiness.

10. Provisions for management of emergency equipment/instruments including inventory and inspection.

Inspection, inventory, and checking of all emergency equipment and instrumentation on an assigned schedule is addressed. There is, however, no indication as to "sufficient reserves" as replacements during calibration or repair.

11. Identification of emergency kits by general category.

No kits are specified. It is not sufficient to merely have the response equipment "available". It must be available in one place in kit form, or in a configuration such that an undue amount of time is not required to collect it.

Equipment not specifically itemized:

1. Instructions for monitoring instruments.
2. Check sources for portable instruments.
3. Instructions for emergency site monitoring and control (DCF's and procedures for projecting dose).

Policy for use of radio-protective drugs is provided (Chapter 9, Section IV. A. V. B. 2. and Tab 1) but no provisions could be found for their supply. These drugs should be considered for incorporation in the emergency kits, especially for use by emergency workers.

I. ACCIDENT ASSESSMENT

8. Rapid assessment of magnitude and location of liquid and gaseous radiological hazards.

This element is thoroughly written in the plan and is well done. The only exception was the absence of estimated deployment times.

No specific provisions were found for notification of monitoring teams at home or at work, although the general procedures are outlined in Chapter 6, Table 3. No call lists, no telephone numbers (or reference to lists), no response times, etc. Chapter 6, Tab 3, Item C refers to "LNED procedures" which may contain such details.

All State departments are responsible for designating an individual to be in charge, but the actual assignments have not been made in general. Instead, responsibilities are listed for organizational entities.

Transportation arrangements are covered in Chapter 6, Tab 3, Item D, but more details would be helpful, e.g., driver assignments, staging procedures, etc.

10. Relating measured parameters to dose rates and estimated integrated doses.

This element is also well described in the plan. However, a section of the plan entitled "Implementing Procedures" was not completed. This should be reviewed before passing final judgement on accident assessment. The provisions for assessing dose rates, estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides, will be contained in the implementing procedures when developed.

Chapter 6, Tab 3, enclosure 4, calls for concentration of radioactivity in units of $\mu\text{Ci}/\text{cm}^3$. Since EPA PAGs use the different (although equivalent) units Ci/m^3 , this table should be modified, or the equivalency of the units noted, to avoid possible confusion.

11. Location and tracking of airborne radioactive plume with aid of federal and/or state resources.

No specific provisions were found for locating or tracking the plume.

J. PROTECTIVE RESPONSE

9. Implementation of protective measures based on protective action guides.

This appears to be complete and adequate except for an "Access Control Map" to be developed and contained in Attachment 2, Chapter 6.

Limits and criteria are given in Chapter 7, Section IV. A. 6. b. and IV. B. 2. for workers VI. B. 1. for general public, IV. B. 3. for institutionalized persons, IV. B. 4. for school children. Chapter 8, Section IV. F. 3. c. 1. cites EPA drinking water standard, IV. F. 3. c. 2. allows $12 \times \text{MPC}$ for short term, IV. F. 3. c. 3. allows $1000 \times \text{MPC}$ for crisis conditions.

In estimating doses for purposes of Chapter 8, Section IV. F. 3. c. it should be noted that all doses are for "standard man" and doses to children or other population groups may be higher or lower, depending on the particular radio-nuclides involved.

10.d. Procedures for protecting mobility impaired including institutionally confined persons.

Cross reference indicates Chapter 4, II. F. p. 4-2. This is incorrect. Chapter 7, III. E. 4. indicates provisions for transport of persons having impaired mobility has been arranged for.

10.f. Methods used by State Health Department in decisions administering KI to central population.

Chapter 9, Tab 1, p. 9 is given as the cross reference. Should read p. 9-12 which indicates the ASOEPA will make the recommendations for the administering of K1 to emergency workers or institutionalized people with an established criteria which is printed in the plan on p. 9-12.

10.i. Projection of traffic capacities of evacuation routes under emergency conditions.

Chapter 7, Tab 1, indicates evacuation time studies have been prepared and can be found as supportive documentation to the plan. The criteria indicates the organizations plan shall include projected traffic capacities of evacuation routes under emergency conditions. This aspect of the plan does not meet the criteria as literally interpreted.

10.j. Organization and control of access to evacuated areas.

Chapter 7- IV. A. 3. is given as the reference to the plan satisfying this criteria. While the plan defines what is meant by access control, it does not address how, who, or under what circumstances such an activity might be initiated.

10.k. Identification and means for dealing with potential impediments to evacuation.

Chapter 7, III. E. 3. references the parish plans and Tab 3; Tab 3 of what? There is no Tab 3 to chapter 7 of the state plan. Chapter 6, III. D. 3. p. 6-2 of the Grand Gulf attachment indicates procedures for dealing with potential impediments will be implemented in accordance with highway department operating procedures. Potential impediments (such as flooding) have not been identified and highway department SOPs are not included as part of plan.

10.l. Time estimates for evacuation based on dynamic analysis.

Cross reference notes Chapter 7, Tab 1, addresses this aspect of planning. While this tab indicates supporting documentation is available regarding the time estimates for evacuation, it is not found in the plan.

10.m. Basis for choice of recommended protective actions in plume EPZ.

Chapter 7, II. D. leaves choices to "judgment of responsible officials", using EPA PAGs as a starting point.

No mention is made of protection afforded by sheltering, which is a vital piece of information needed by decision-makers in deciding whether evacuation (Chapter 7, IV. A. 4.) or sheltering (Chapter 7, IV. A. 1.) is preferred. EPA report "effectiveness of Sheltering as a Protective Action Against Nuclear Accidents Involving Gaseous Releases", EPA 520/1-78-001 should be reviewed and factored into the Plan, to assist the decision makers.

11. Protective measures for ingestion pathway.

Protective actions are given in Chapter 8, IV. F. 1. b. for milk, 8. IV. F. 2. for other foods, and 8. IV. F. 3. c. 5. for water.

No procedures were found for determining contamination levels or for estimating dose consequences of uncontrolled ingestion.

Decontamination of food stuffs is covered in Section 8, IV. F. 2.

Maps of water supply intakes and treatment plants are referenced in Chapter 8, Tab 2 and will be maintained by "the State". The specific location of such maps should be indicated, along with the name or title of the person responsible for maintaining them, and telephone number. Consideration should be given to making the maps a part of the plan.

12. Registration and monitoring evacuees in relocation centers.

Chapter 9 addresses monitoring, decontamination procedures, etc. but does not provide for registration of evacuees using or passing through the reception area.

K. RADIATION EXPOSURE CONTROL

4. Decision chain to authorize emergency workers to incur exposures in excess of PAGs.

Procedural arrangements have been made on paper (e.g., Chapter 9. V. B. 1. b.), but methods for tracking over-exposed workers are not detailed. This could be corrected by elaborating the instructions on the Dosimeter Report Form (Chapter 9, Tab 6).

The Preventive PAG levels specified in Chapter 9. V. D. are consistent with EPA guidance to minimize exposures. However, the Plan does not indicate how these PAGs are to be used. Section 9. V. D. 1. indicates exposures up to 25 Rem (W.B.) or 125 Rem (thyroid) will be accumulated "as directed by LNE". This control is not, however, reflected in the Dosimeter Report Form, which implies that there are no restrictions on exposures up to those limits. This should be clarified.

Authorization to exceed emergency PAGs can be given by the chief executive officer of the affected Parish, or by the ASOE. Neither of these officials is required to have specialized training in radiological health physics. A health physics professional should be explicitly identified somewhere in the decision chain. The professional should be a medical doctor with radiological health training, or should have advanced training dealing with radiation injury.

5.b. Means for decontamination of emergency personnel, supplies, and equipment, and waste disposals.

External contamination control is covered in Chapter 9, Tab 2.

Persons with contaminated wounds are to be referenced to nearest medical facility. (Chapter 9, Tab 4, Item 2). No other internal contamination provisions could be found. Provisions should be added for persons exposed to the plume who may be internally contaminated through the inhalation pathway and require decontamination.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

1. Local and back-up material and medical services.

The State has not yet completed a listing of hospitals equipped to accept radiation accident patients. Tensas Parish Plan provides letters of agreement with several hospitals in this category. Tab 1 to Chapter 9 in the Tensas Parish Plan refers to hospital decontamination plans but no plan was included. These plans must be reviewed before an evaluation of this element can be completed.

3. Lists, locations and capacities of public, private, military hospitals.

Chapter 10 of the plan addresses medical and public health aspects of REP planning. IV. B. 2. indicates Tab 4 lists the hospitals capable of receiving and treating radioactively contaminated persons. Tab 4 is to be developed, therefore is deficient.

4. Transportation of accident victims to medical support facilities.

Chapter 10, paragraph IV. A. 1. addresses transportation of on-site personnel needing medical treatment and IV. A. 2. indicates that parish OEPs are responsible for coordinating emergency medical services and that the ambulance services can be found under Tab 2 which is to be developed and is therefore a deficiency.

M. RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

1. General plans and procedures for reentry and relaxation of protective measures.

Protective actions will be relaxed by the ASOEA based on LNED recommendation (Chapter 11, III. A.). An individual should be identified to make the recommendation rather than the organizational entity (LNED).

4. Method for periodic estimation of total population exposure.

This is probably implied in Section IV. J. and is a responsibility of the LNED as stated in Section VI. B. 13. e. The plan does not, however, establish a method. Population doses are likely an output of LNED's computer capabilities noted in Chapter 6, III. C. 1. a.

N. EXERCISES AND DRILLS

2. c. Medical emergency drills (licensee/local).

Inadequate. The State plan does not address medical emergency drills and the Tensas Parish Plan states this section is "not applicable".

2.d. Annual radiological monitoring drills.

Annual drills are specified in Chapter 13. IV. A. 2. However, this chapter merely recites NUREG-0654 requirements and does not add the necessary elaboration to make the Plan a working document. For example, responsible individuals should be designated within the organizations to plan and coordinate the drills, it should be stated whether the State participates in each annual drill at each facility, the extent of realism required, i.e., simulation vs. actual data collection and response actions, etc.

2. 3. Health physics drills

Chapter 13, IV. A. 3., indicates health physics drills will be conducted semi-annually. Plan does not indicate analysis of simulated elevated airborne sample (wording of sentence is of such to indicate only liquid analysis).

2.e.(1) Semi-annual health physics drills

Chapter 13. IV. A. 3., also merely recites NUREG-0654 requirements without elaboration. There is no indication how many health physicists are to be involved, whether two drills are required at each facility, who is the individual responsible, etc.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

1.b. Training programs for offsite response organizations including fire, police, and ambulance/rescue personnel.

Chapter 12, III. A. 1., indicates training will be provided by the facility for offsite personnel responding on site. Did not find provisions for training of those organizations who might have mutual aid pacts or agreements with the primary emergency response organizations.

P. RESPONSIBILITY FOR THE PLANNING EFFORT

1. Training of planning personnel

Chapter 12, V. B. is listed as cross reference - incorrect. Should read Basic plan, V. B. p. 20 which says the ASOEA is authorized to direct the development and implementation of emergency response plans for FNFs. It is not indicated that State Planning Personnel shall be trained but can only be assumed.

6. A listing of supporting plans

Inadequate. Some supporting plans are referred to in various parts of the State and Parish plans but there is no detailed listing of State or local supporting plans and related documents.

7. A listing by title of SOPs

Inadequate. These procedures are not in either the Parish or State plans. Both plans indicate procedures are "to be developed".

This is an important element and must be provided to complete the plan evaluation.

8. A table of contents and cross references to NUREG-0654/FEMA-REP-1, Rev. 1

B. P. page i is a table of contents for the plan. The cross reference while not numbered as a part of the plan is included (needs corrections).

Attachment B

Consolidated and Condensed Exercise Evaluation Comments
Relative to the Louisiana State Plan as Submitted to the
State after Exercising the Grand Gulf Facility

OBSERVATIONS NOTED IN THE GRAND GULF NUCLEAR STATION EXERCISE

I. Emergency Operations Facilities and Resources

C.1.b. - What are the procedures to be used to request Federal resources? What Federal resources were requested during the exercise and by whom? Was the Federal response adequate and timely?

Scenario did not call for exercising this element.

C.1.c. - What procedures have been established to provide available State and local resources to support the Federal response? Were these resources needed during the exercise? Were they provided in a timely manner and were they adequate?

Scenario did not call for exercising this element.

F.1.b. - What provisions have been established for communications with contiguous state/local governments within the Emergency Planning Zone? Were these provisions effectively executed during the exercise? If there were problems, indicate what they were.

Initial warning and notification was not exercised consistent with the plan. LOEP has the capability for 24-hour warning and notification as well as LNEP. Question that the dedicated telephone circuitry and the commercial telephone circuitry satisfies the requirement for dissimilar initial warning and notification from the licensee to the OPR. Unable to hear the ring of the dedicated land line circuit. OEP needs to establish SOPs for utilization of dedicated land line circuitry.

Rating: 3

F.1.c. - What were the provisions for communications with the Federal emergency response organizations? Were these provisions initiated and if so, what were the results?

Scenario did not call for exercising this element. However, LOEP did not notify FEMA Region 6 at the alert EAL.

Rating: 3

F.1.d. - What provisions were established for communications between the nuclear facility and the licensee's near-site EOF, State and local EOCs, and radiological monitoring teams? Were the systems/procedures effective to the overall emergency response as observed during the exercise?

Satisfactory

Rating: 4

- H.3. - Where are the State and local emergency operating centers? If readily available, how much EOC working space is there? Is this adequate? What are the provisions for EOC security? Were the provisions initiated and what were the results? What are the provisions in the plan for EOC communications? Describe the EOC internal communications system as you observed it. Is it adequate? Are there provisions in the plan for the necessary display information and who is responsible for it? As you observed the EOC displays, were they adequate? Others needed?

Limited space at the local EOC. There was demonstrated need to keep the EOC participants better informed. Adequate local visuals, but not properly displayed and message board not kept current. State displays were adequate but not properly utilized. The state plan lacks specific procedures for internal communications. Recommend LNED and LOEP coordinate and provide for adequate displays for the governor's press room.

Rating: 4

- J.10.a.- What are the provisions for maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas? As observed, did the decision makers use the maps and did the maps appear to be adequate?

The radiological sampling and monitoring maps, relocation maps, and shelter area maps are not in the plan. Radiological sampling and monitoring map was not available at the local EOC. Shelter area map not at the local EOC. Maps need enlarging and vectored. The state EOC had adequate maps but they were not used to any great extent.

Rating: 3

- J.10.b.- What are provisions for sector maps showing population distribution around the nuclear facility? Did the decision makers use the maps and did the maps appear to be adequate?

No deficiencies noted.

Rating: 3

II. Alerting and Notification of Officials and Staff

- A.1.e. - In what manner has the organization to be evaluated provided for a 24-hour per day emergency response capability, including a 24-hour per day manning of the communications system? Did the provisions, when initiated, work well? Other comments?

The plan sufficiently addressed the 24-hour per day alert capability. Was not exercised, assumed to be sufficient.

- A.4. - What are the provisions for continuous (24-hour) operations for a protracted period? Who is responsible for assuring continuity of resources? As observed, were the provisions adequate? Was there an observed capability for effective shift change over an extended period of time? Comments?

Capability not exercised.

- C.2.a. - The plan indicates the Louisiana Nuclear Energy Division will dispatch a technical analysis representative to the licensee's near-site EOF. Was this done during the exercise?

Satisfactory.

Rating: 4

- E.1. - What are the established procedures for notification of response organizations? If observed, how effective were these procedures, when implemented? How effective is the verification system for transmission and receipt of communications between State and local organizations?

Additional practice needed at the local level but implemented satisfactorily.

Rating: 4

- E.2. - What are the procedures for alerting, notifying and mobilizing emergency response personnel? Were these procedures used and how effective did they appear to be?

There was one incorrect telephone listing, otherwise satisfactory.

Rating: 4

- E.3. - Were the initial emergency messages sent by the licensee handled effectively? Did they contain the following information: (1) identification of the emergency action level (2) if a release is taking place, (3) identification of potentially affected population and areas, and (4) whether protective measures may be necessary?

Received erroneous information from the utility. However, did not detract from state and local capability.

Rating: 3

- F.1.a. - What are the provisions for an emergency response communications network with manning on a 24-hour basis? Was this notification capability and effective ability to activate the emergency response network demonstrated during the exercise? Was there a telephone link and an alternate means for notification available and what were they?

Satisfactorily demonstrated.

Rating: 3

- F.1.e. - What procedures have been established for alerting or activating emergency personnel in the organization being evaluated? Were these procedures activated and how effective were they?

Alerting notification and activation of local personnel was demonstrated satisfactorily.

Rating: 4

- F.2. - What is the provision for a coordinated communications link for fixed and mobile medical support facilities? Was the method used during the exercise and did it add to the overall emergency response capability?

Emergency personnel should use channel 2 on the radio frequency for normal operational messages. Lack of voice communications between mobile medical and fixed medical - planned to be corrected in the future.

Rating: 3

- H.4. - What are the procedures for timely activation and staffing of the emergency response centers? During the exercise, were the centers activated and staffed in a timely manner?

Procedures for activation and staffing of the EOC should be included in the plan.

Rating: 3

III. Emergency Operations Management

- A.1.a. - Who are the organizations identified as a part of the overall response organization? Was each organization participating in the exercise?

No comment - each organization participated.

Rating: 3

- A.1.b. - How is the organization's role in the concept of operations defined? Could the observer determine from observation the organization's role and its relationship to the total effort during the exercise?

All operations controlled through EOC effectively.

Rating: 3

- A.1.d. - Who is the individual, by title, who is in charge of emergency response? During the exercise, did the designated official assume charge of emergency response?

The designated official assumed the leadership role satisfactorily.

Rating: 4

- A.2.a. - What are the assigned functions and responsibilities assigned to the organization being evaluated? How well did the organizations carry out these functions and responsibilities?

All functions and responsibilities were carried out effectively.

Rating: 4

- A.3. - What written agreements have been made for the organizational function being evaluated? Were these agreements implemented during the exercise?

Any written agreements which had been made and consummated were done effectively.

Rating: 4

- C.1.a. - Who is the person, by title, authorized to request Federal assistance? Was such request for assistance observed during the exercise?

Not exercised.

- C.4. - What nuclear and other facilities, organizations, or individuals have been identified which can be relied upon to provide emergency assistance to the organization being evaluated? Did the observer note any assistance being requested from any of these identified groups and were the responses adequate?

Assistance requested from several organizations and all responded in an effective manner.

Rating: 4

- D.3. - Were State and local classification and emergency action levels used during the exercise consistent with that of the utility?

State and local EALs were consistent with that of the utility.

Rating: 4

- D.4. - What procedures are in place that provide for emergency actions to be taken which are consistent with the emergency actions recommended by the nuclear facility licensee, taking into account off-site conditions. Were these procedures implemented and what were the results?

All procedures were implemented effectively with favorable results.

Rating: 4

IV. Public Alerting and Notification

- E.5. - What system is to be used for dissemination to the public of information received from the licensee (includes EBS)? Was activation of this system observed and what were the results?

The EBS was activated satisfactorily.

Rating: 4

- E.6. - What is the administrative and physical means planned for prompt notification to the public? Is the system in place? Was it used during the exercise and was it adequate to warn all the population requiring notification?

The system is in place and was tested. Questionable whether all people can be warned by the present system. The alert notification system will be tested at a later date. A rating will be given at that time.

- E.7. - Are there messages in the plan intended for the public, giving appropriate instructions with regard to specific protective actions to be taken, etc. Were these messages used during the exercise? Did the messages provide all the information needed?

Was not exercised completely.

Rating: 3

- J.10.c.- How does the plan provide for notification to all segments of the transient and resident population? Is this system adequate as demonstrated during the exercise?

All systems were not tested during the exercise. The ones that were, were satisfactory - the remainder will be tested at a later date.

Rating: 3

V. Public and Media Relations

- G.1. - What is the method to be used for periodic dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency? Was there any evidence during the exercise to indicate that this periodic dissemination was being made?

Method for periodic dissemination has been accomplished. However, there is a need for coordination between MP&L spokesperson and media at the local level in Louisiana.

Rating: 4

- G.2. - What provisions have been made for a public information program for the permanent and transient population in the 10 mile EPZ? Was evidence of this observed during the exercise?

Provisions for information to permanent and transient population has been addressed and was observed to be sufficient.

Rating: 4

- G.3.a. - Who are the points of contact and physical locations for use by news media during an emergency? Were there any problems finding the contact persons or the location of the PIOs?

Recommend that LNEP and LOEP discuss and settle on one news media site at the state level taking into consideration the desires of the governor. Appropriate functions of each should be worked out. Also, needed in the plan is the procedure whereby news releases would be cleared with the utility media center.

G.3.a. - If there was a joint media facility, what were the good and (con't) bad points?

The Mississippi side is responsible for the emergency news media center. However, the state of Louisiana did experience some difficulty in coordinating news responses with them.

No rating.

G.4.a. - Who is the designated media spokesperson for the organization being evaluated, or if that organization does not have a spokesperson, who is to speak for it?

Reference remarks under G.3.a.

Rating: 3

G.4.b. - What arrangements have been made for a timely exchange of information among designated spokespersons? Were these arrangements used during the exercise and were they adequate?

A lack of advance arrangements for inter-media exchange of information.

Rating: 3

G.4.c. - What are the coordinated arrangements planned for dealing with rumors? Were these arrangements initiated and were they effective?

Arrangements had been made for dealing with rumors but were not put into effect during the exercise.

VI. Accident Assessment

H.7. - What are the provisions for offsite radiological monitoring equipment in the vicinity of the nuclear facility? Were these provisions adequate?

Observed and were adequate.

Rating: 3

H.12. - Has each organization established a central point (preferably associated with the licensee's near-site EOF) for the receipt and analysis of all field monitoring data and coordination of sample media? Were there any problems in getting the data/sample media to the specified central point?

The requirement has been met.

Rating: 4

- I.7. - Was the capability and resources for field monitoring, as described in the plan observed to be adequate during the exercise?

Adequate, but need additional training.

Rating: 3

- I.8. - What are the provisions for methods, equipment, and expertise to make rapid assessments of the actual or potential radiological hazards through liquid or gaseous release pathways? During the exercise, were adequate assessments made? (The assessment should include the magnitude and location of the release as well as the method of activation, notification means, field team compositions, transportation, communications, monitoring equipment, and estimated deployment times).

Misinterpretation of technical data was believed to be by GGNS and not a fault of NED. Activation of field deployment teams was very satisfactory.

Rating: 4

- I.9. - Does the organization being evaluated have the capability to detect the measure radio-iodine concentrations in the air within the plume exposure EPZ as low as 10^{-4} Ci/cc under field conditions? Were any such measurements made during the exercise and did they appear to be accurate?

Not observed but sufficiently addressed in the plan.

- I.10. - Does the State level organization have the means for relating measured parameters to dose rates for Key isotopes and gross radioactivity measurements? Are there detailed provisions described in separate procedures? Were these procedures implemented during the exercise and what were the results?

Good capability exists.

Rating: 4

- I.11. - What are the arrangements to locate and track the airborne radioactive plume? Were these arrangements carried out during the exercise and were they workable?

Arrangements were satisfactory and demonstrated during the exercise.

Rating: 4

J.10.m.- At the State level does the plan provide bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions? During the exercise were the recommended protective actions made in accordance with the plan bases?

There was some confusion on interpretation of protective actions recommended by EPA PAGs (apparently confusion by GGNS).

Rating: 3

C.3. - What radiological laboratories were named in the plan, and what are their general capabilities and expected availability? Were requests made or simulated to these laboratories during the exercise? What were the results?

Requests were simulated for laboratory assistance during the exercise but were not needed.

Rating: 4

VII. Actions to Protect the Public

J.2. - Are there contingency plans for movement of onsite individual to offsite locations? Were these plans implemented during the exercise and what were the results?

Not applicable.

J.9. - How did the State and local organizations implement protective measures based on protective action guides (PAGs) and other related criteria? Was it consistent with the plan? Was this activity adequate for the protection of the public?

Protective measures consistent with PAGs.

Rating: 4

J.10.d.- What are the provisions for protecting those persons whose mobility may be impaired, confined at home or in institutions? Were these provisions exercised and what were the results?

Provisions for protecting persons with impairments, disabilities, etc., well addressed and simulated during exercise.

Rating: 5

J.10.g.- What are the procedures for implementing relocation of the populace? Were these procedures followed during the exercise and what were the results?

A need for more information to personnel responsible for shelters.

Rating: 3

J.10.h - Where are the planned relocation centers? Were these centers activated during the exercise and what were the results?

Relocation centers were reactivated. Demonstrated need for additional training by shelter staff.

Rating: 4

J.10.k.- What are the potential impediments to use evacuation routes identified in the plan? What are the means of dealing with these potential impediments? Did the exercise include an impediment as identified and how was it handled?

None identified in the plan. However, it was noted there is a railroad track passing through St. Joseph which could be a potential impediment. The exercise did not include any impediments.

J.10.l.- What are the time estimates for evacuation as projected in the plan? Was evacuation simulated during the exercise? If there was a partial evacuation, describe. What potential problems might be encountered as seen from the exercise?

Misdirection of traffic at roadblock 6 (simulated evacuation).

Rating: 3

J.11. - What protective measures are specified in the plan for use in the ingestion pathway, including the methods for protecting the public from consumption of contaminated food stuffs? Was there any exercise of the ingestion pathway protective measures and what were the results?

The scenario did not call for implementation of 50-mile ingested pathway zone precautionary measures.

J.12. - What are the provisions for registration and monitoring of evacuees at relocation centers? Were these functions observed during the exercise? Were they handled in an effective manner, or were there problems?

More information to registrants at relocation centers.

Rating: 4

VIII. Health, Medical, and Exposure Control Measures

J.10.e.- What are the provisions in the plan for the use of radio-protective drugs, particularly for emergency workers and institutionalized persons in the plume EPZ, including quantities, storage, and method of distribution? Was the use of such drugs simulated during the exercise? Comments?

The use of radio-protective drugs not exercised.

J.10.f.- What is the method to be used by the State Health Department in decisions to administer KI to the general population during an emergency and the predetermined conditions under which such drugs may be used by offsite emergency workers?

Not implemented.

J.10.j.- What are the provisions for control of access to evacuated areas and organizational responsibilities for such control? Were these provisions demonstrated during the exercise? Simulated? Comments?

Provisions for control of access to evacuated areas were adequate.

Rating: 4

K.3.a. - What are the provisions for a 24-hour-per-day capability to determine the doses received by emergency personnel? Were these provisions implemented during the exercise and what were the results?

Provisions were covered in the plan. However, only self-reading devices were observed.

K.3.b. - What are the provisions for frequent emergency worker dosimeter readings and how are dosage records to be kept? Were these provisions carried out during the exercise and how successfully were they carried out?

Sufficiently addressed in the plan - minimal observation during exercise.

K.4. - What is the decision chain established for authorizing emergency workers to incur exposures in excess of EPAs PAGs? Was this action a part of the exercise? Comment?

Scenario did not call for exercising this element.

- K.5.a. - What are the action levels specified for determination of the need for decontamination? As used during the exercise, were the action levels adequate?

Not exercised.

- K.5.b. - What means is provided for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and waste disposal? Was decontamination required during the exercise? How effective?

Not exercised.

- L.1. - What arrangements have been made for local and backup hospital and medical services with capability for evaluation/treatment of contaminated individuals? How did the implementation of the arrangements work out? What facilities were used and how well did the medical personnel perform? Were the facilities adequate?

Question the need for medical decontamination capability. Was exercised and additional training needed.

Rating: 3

- L.3. - Has the State developed a list of the location of public, private, and military hospitals and other emergency medical services facilities considered capable of providing medical support for any contaminated injured individual? Were any of these facilities called on for assistance during the exercise?

Failed to see the need for this capability for this facility and was not exercised.

- L.4. - What arrangements have been made for the transportation of accident victims to medical support facilities? During the exercise, were there any accident victims? If so, how effective was the pre-arranged transportation?

Sufficiently addressed.

Rating: 3

- M.4. - What method has the State outlined for periodic estimation of total population exposure? Was this in evidence during the exercise? Comments?

Vaguely implied in the plan and was not observed during exercise.

IX. Recovery and Reentry Operations

- M.1. - What generally is planned to accomplish recovery and reentry functions? Was recovery and reentry exercised? Describe what took place? Are the provisions adequate?

Exercised minimally.

- M.3. - What are the State procedures for informing response organizations that reentry has been initiated? Exercised? Adequate?

Exercised minimally.

X. Relevance of the Exercise Experience

- N.1.a. - Did the exercise test the integrated capability of the various plans and organizations? Did it test a major portion of the basic elements of the plans? Comments?

A need for additional training and education at the local and state level. Public warning devices need attention.

Rating: 3

- N.1.b. - Did the observer feel the scenario was adequate to verify the capability to respond to a radiological accident? Comments?

The scenario was limited. The ability of the state and local emergency organizations to respond to a radiological accident is adequate.

Rating: 3

Did the exercise appear to benefit the participants? Explain.

Brought out items that needed further clarification in the plan and some weak areas that could be enhanced by further training and education.

Attachment C

Consolidated and Condensed Plan Review/Evaluation Comments

Relative to Enclosures 1 and 2 of Attachment 1

(Waterford 3 Site-Specific Plans for St. Charles and St. John the Baptist Parishes)

WATERFORD III
CONSOLIDATED RAC COMMENTS

Enclosures 1 and 2 to Attachment 1

ELEMENT
0654

COMMENTS

A. ASSIGNMENT OF RESPONSIBILITY (Organization Control)

- A.1.a. Both parish plans define responses and agencies including parish support on p. 66, encl. 1, and p. 10, encl. 2.
- A.1.b. Parish concept of operations defined p. 74, encl. 1, and pp. 236-239, encl. 2.
- A.1.c. Emergency preparedness organization charts p. 80, encl. 1, and p.241, encl. 2.
- A.1.d. Respective parish presidents have responsibility for overall safety. Emergency Preparedness Coordinators coordinate emergency operations, p.73, encl. 1, and p. 230, encl. 2.
- A.1.e. St. Charles and St. Johns parish EOCs are capable of 24 hour per day operations over extended periods of time, p. 73, encl. 1, and p. 235, encl. 2. St. Charles parish maintains communications link with state, utility, and St. Johns parish, p. 121, encl. 1.
- A.2.a. Emergency functions and responsibilities chart found on p. 79, encl. 1, and p.124, encl. 2. St. Charles and St. Johns parish accident assessment is not specifically addressed in parish plan but is carried as a state function in the state plan. USDA recommends assignment of responsibility to USDA emergency Boards for the purpose of providing coordination and assistance for damage assessment activities. The USDA SEB in LA is Mr. Willy F. Cooper. P. 79, encl.1, and p. 241, encl. 2 - primary responsibility for highway maintenance incorrectly assigned to health and medical.
- A.2.b. P. 66, encl. 1, p. 228, encl. 2 - addressed adequately.
- A.3. Indication is that parish will enter into appropriate agreements with applicable organizations, p. 217, encl. 1, and p. 375, encl. 2. Letters of agreement are not included.
- A.4. P. 73, encl. 1., and p. 235, encl. 2.

B. ONSITE EMERGENCY ORGANIZATION

- B.2. No cross reference. Check licensee facility plan for identification of emergency coordinator.

ELEMENT 0654	COMMENTS
<u>C. EMERGENCY RESPONSE SUPPORT AND RESOURCES</u>	
C.1.c.	State responsibility.
C.2.a	State responsibility.
C.3.	State responsibility.
C.4.	Support and resources noted on page 10 of Attachment 1, p. 217, encl. 1, and p. 375, encl. 2. <u>Need letters of agreement or understanding from non-governmental organizations being relied upon to provide resources.</u>
<u>D. EMERGENCY CLASSIFICATION SYSTEM</u>	
D.3.	Chapter 4 of the general plan sufficiently addresses emergency level guidelines, p. 36.
D.4.	Actions at various EALs are outlined on pp. 74-77, encl. 1, and pp. 236-239, encl. 2.
<u>E. NOTIFICATION METHODS AND PROCEDURES</u>	
E.1.	Notification consistent with emergency classification scheme- p. 117, encl. 1, and p. 278, encl. 2. <u>The chapters provide the concept of operations but not procedure. It does indicate that operational hotline procedures are to be developed. USDA chair person should be notified.</u>
E.2.	P. 119, encl. 1, and p. 280, encl. 2. <u>Operational hotline procedures not developed.</u>
E.3.	<u>Attachment 1, pp. 13-18. Not cross-referenced. Not indicated state will call in accordance with revised 0654.</u>
E.5.	EBS use and messages addressed. Pp. 130-134, encl. 1, and pp. 280-315, encl. 2.
E.6.	Time and population coverage found on p. 133, encl. 1, and p. 300, encl. 2.
E.7.	<u>Messages to the public included, pp. 135-145, encl. 1, and pp. 302-312, encl. 2. Reference evacuation message no. 3 - question advisability of having farmers call USDA county agent due to line overload and limited personnel.</u>
<u>F. EMERGENCY COMMUNICATIONS</u>	
F.1.a.	Twenty-four hour per day communications capability is assumed on p. 118, encl. 1. and p. 278, encl. 2. Operations concept described pp. 122 and 123, encl. 1, and p. 283, encl. 2.

ELEMENT 0654	COMMENTS
F.1.b.	Communications with St. Johns parish provided p. 122, encl. 1 and with St. Charles parish, p. 283, encl. 2.
F.1.c.	Communications with Federal emergency response defined p. 123, encl. 1, and p. 284, encl. 2.
F.1.d.	Communications with facility and local government addressed p. 123, encl. 1, and p. 284, encl. 2.
F.1.e.	Alerting of emergency response personnel, p. 118, encl. 1, and p. 243, encl. 2. and alerting of EOC personnel, p. 81, encl. 1, and p. 243, encl. 2.
F.2.	Coordinated EMS communications link, p. 198, encl. 1, and p. 357, encl. 2.
F.3.	Periodical testing of communications system addressed, p. 124, encl. 1, and p. 285, encl. 2.
<u>G. PUBLIC EDUCATION AND INFORMATION</u>	
G.1.	Public education and information addressed, p. 25, attachment 1.
G.2.	Information programs for transients and residents provided for, p. 25, attachment 1 <u>(to be developed)</u> .
G.3.a.	Designated spokesperson found on p. 25, attachment 1. <u>Not specific in locating media center.</u>
G.4.a.	Spokesperson designated, p. 25, attachment 1.
G.4.b.	Coordination of news releases, p. 25, attachment 1.
G.4.c.	<u>Rumor control center to be established</u> , p. 25, attachment 1.
G.5.	Programs for informing news media addressed, p. 26., attachment 1.
<u>H. EMERGENCY FACILITY AND EQUIPMENT</u>	
H.3.	Local EOC established St. Charles parish, p. 73, encl. 1, and St. Johns parish, p. 235, encl. 2.
H.4.	<u>Activation and staffing of St. Charles and St. Johns parish EOCs not addressed. Implementing procedures to be developed</u> , p. 116, encl. 1, and p. 277, encl. 2.
H.7.	<u>Equipment for monitor/survey listed, p. 221, encl. 1, and p. 378, encl. 2.; but quantity and storage location not identified. Resource management officer for supplying equipment not identified in enclosure 1 or enclosure 2.</u>

ELEMENT
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COMMENTS

- H.10. Periodic calibration of instruments not addressed.
- H.11. P. 221, encl. 1, and p. 378, encl. 2. has form for resources inventory but inventory has not been tabulated on form. Kit contents, location, and custodian not identified.
- H.12. Satisfactorily covered in state plan, pp. 6-12.
- I. ACCIDENT ASSESSMENT
- I.7. State assumes responsibility - see state plan, pp. 6-22.
- I.8. State assumes responsibility - see state plan, pp. 6-22.
- I.9. State responsibility.
- I.10. State responsibility.
- I.11. State responsibility.
- J. PROTECTIVE RESPONSE
- J.2. Not addressed in state and/or local plan.
- J.9. Parish plans consistent with state plan, p. 155, encl. 1, and p.320, encl. 2. Need capability for implementing protective measures (ie., respiratory protective measures, protective clothing, and drugs).
- J.10.a. Tab 5, Chapter 4, p. 177, encl. 1, and tab 5, chapter 4, p. 342, encl. 2 includes maps. However, maps and instructions to public should be more definitive than those in plan, did not find maps designating monitoring or sampling points.
- J.10.b. Pp. 20-22, attachment 1, show population by evacuation areas (16, 22 1/2° sectors) but areas are not consistent with evacuation area maps found in Tab 5. Suggest evacuation area maps be consistent with population distribution maps.
- J.10.c. Encl. 1, p. 132, and encl. 2, p. 290, indicates a combination of fixed sirens and alerting teams will accomplish alert notification.
- J.10.d. Pp. 67, 95, and 183, encl. 1., and pp. 229, 264, and 345, encl. 2. address capability for protecting handicapped or institutionalized persons.

ELEMENT
0654

COMMENTS

- J.10.e. State has responsibility for administration of radio-protective drugs and is sufficiently addressed in state plan.
- J.10.f. State plan and attachment 1, p. 45, encl. 1. address use of KI for emergency workers but not for general public (assume general public not to be considered for KI administration).
- J.10.g. Attachment 1, p. 9 generically addresses means of evacuation. Inserts to Tab 7, encl. 1., should be completed.
- J.10.h. Pp. 169-176, encl. 1. and pp. 332-339, encl. 2. addresses reception centers and shelters.
- J.10.i. P.162, encl. 1, and p. 328, encl. 2., references evacuation team study completed. Assumption made study included route capacities under emergency conditions.
- J.10.j. P. 83, encl. 1 and p. 246, encl. 2., assigns responsibility for access control to parish sheriff.
- J.10.k. P. 111, encl. 1, and p. 272, encl. 2., assigns responsibility for removal of impediments to Public Works Officer. However, other than stalled autos impediments have not been identified as required by the criteria.
- J.10.l. P. 162, encl. 1, and p. 328, encl. 2, references team studies. Assumption is made study included time estimates by sector for evacuation within PEP.
- J.10.m. Adequately covered in state plan.
- J.11. State responsibility and sufficiently covered in state plan.
- J.12. P. 61, encl. 1, and p. 327, encl. 2. indicates evacuees will be surveyed and registered but does not describe means for doing so nor lists supplies or storage locations of instruments for surveying.

K. RADIOLOGICAL EXPOSURE CONTROL

- K.3.a. Responsibility assumed by state, chapter 9, p. 2.
- K.3.b. State assumes all responsibility for dose records, see state plan.

ELEMENT
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COMMENTS

- K.4. P. 47, attachment 1, p. 157, encl. 1., and p. 323, encl. 2., established decision making chain for excess exposures to emergency workers. Parish president makes authorization, should be done after consultation with trained medical doctor or health physicist. Plan should indicate ALARA principles still applicable and levels are upper limits not to be exceeded, section V.D.2.a. and b. should be separated from section V.D.2. and combined with section V.D.3. Limit of 75 Rem should be defined as absolute upper limit and reason for not giving upper limit thyroid dose explained.
- K.5.a. Chapter 5, p. 48 of attachment 1 gives decontamination levels of .1 MR/hr for general public. Assume same level would apply for decontamination of emergency workers and/or inanimate objects.
- K.5.b. State responsibility and generally covered sufficiently. No special arrangements for necessary supplies.

L. MEDICAL AND PUBLIC HEALTH SUPPORT

- L.1. P. 193, encl. 1, and p. 354, encl 2.. Plan does not indicate training has been accomplished, equipment/supplies available, or written hospital plans for handling contaminated persons.
- L.3. State responsibility. P.204, encl. 1., and p.362, encl. 2. identify medical facilities for handling contaminated persons.
- L.4. Pp. 196 & 197, encl. 1, and p. 354, encl. 2. provide for transportation and pp. 207 and 208, encl. 1, and p. 365, encl. 2. list ambulance services and vehicles available.

M. RECOVERY AND REENTRY PLANNING AND POSTACCIDENT OPERATIONS

- M.1. P. 210, encl. 1, and p. 368, encl 2., notes considerations for recovery/reentry recommendations. Meaning of ambient levels of radioactivity, section II.B.1., is not clearly defined.
- M.3. State responsibility.
- M.4. State responsibility.

N. EXERCISES AND DRILLS

- N.1.a. Attachment 1, p. 32, notes criteria.

ELEMENT
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COMMENTS

- N.1.b. Attachment 1, pp.32-33, meets criteria minimally, does not specifically address scenario variation annually or exercises under variable weather conditions or at varying 24-hour time intervals once every six years.
- N.2.a. Attachment 1, p. 34, addresses communications drills.
- N.2.c. Attachment 1, p. 34, addressed adequately.
- N.2.d. Attachment 1, p. 34, addressed adequately.
- N.2.e. State responsibility.
- N.3.a.b.c.d.e.f. Attachment 1, p. 35, addressed adequately.
- N.4. Attachment 1, p. 33, addressed adequately.
- N.5. Attachment 1, p. 33, addressed adequately.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

- O.1. Attachment 1, p. 27, addressed adequately.
- O.1.b. Attachment 1, p. 27 and 28, generally, meets criteria, does not specifically reference training of emergency personnel having mutual aid agreement with emergency organizations responding on site (is implied in para. III.A.1.).
- O.4.a.b.c.d.
f.g.h.j. Attachment 1, pp. 28-29 addressed adequately.

P. RESPONSIBILITY FOR THE PLANNING EFFORT

- P.1. Attachment 1, p. 30 indicates people may attend planning course.
- P.2. Pp. 68 and 73, encl. 1, and p. 230, encl. 2. Individual identified for emergency operations. This person assumed to have responsibility for emergency planning.
- P.3. P. 68, encl. 1, and p. 230, encl. 2., indicates that the Emergency Preparedness Coordinator is responsible for planned development and maintenance.
- P.4. Attachment 1, pp. 10 and 11, indicates parish plan to updated annually.

ELEMENT
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COMMENTS

- P.5. Attachment 1, p. 11, addresses authority for and distribution of plans. The plan does not indicate revised pages to be dated and marked to indicate changes.
- P.6. P. 66, encl. 1, and p. 228, encl. 2, cites local authority for plans and state plan, pp. 2-4, cites state authority for plans. The state plan contains some supporting plans and their sites, but there is no detail listing.
- P.7. P. 116, encl. 1. and p. 277, encl. 2 indicate implementing procedures to be developed.
- P.8. Attachment 1, pp. i and ii, is a Table of Contents for attachment 1, pp. 63-65, and pp. 63-65, encl. 1 and pp. 225-226, encl.2 are the Table of Contents.
- P.10. Attachment 1, p. 11, indicates phone numbers will be verified each calendar quarter.
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