

DOCKETED
10/1/82

'82 APR 21 11:21 April 20, 1982

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
LOUISIANA POWER & LIGHT COMPANY) Docket No. 50-382
)
(Waterford Steam Electric)
Station, Unit No. 3))

TESTIMONY OF ROBERT WILLIAM MYERS ON
RADIOLOGICAL EMERGENCY RESPONSE PLANS

Q. State your name and address.

A. Robert William Myers, 745 Highland Park Drive,
Baton Rouge, Louisiana.

Q. By whom are you employed and what is your
position?

A. I am employed by the Louisiana Department of
Natural Resources, Office of Environmental Affairs, Nuclear
Energy Division (LNED). My position is that of Environmental
Program Specialist. It can best be described as health
physicist/emergency planning and response coordinator.

Q. Please describe your professional and educa-
tional background and experience.

820423 6519

A. I hold a B.S. from California Polytechnic State University and a Master of Science degree from Louisiana State University. I have worked for three years on the faculty of LSU as a research associate in aquatic radioecology. For the past 21 months, I have worked at the Louisiana Nuclear Energy Division in my current capacity.

Q. Please describe the history of the development of the State of Louisiana's radiological emergency response plans including the parish attachments.

A. The Louisiana Peacetime Radiological Response Plan was first formulated as a draft in 1974. At that time it addressed all radiological emergencies except those involving nuclear power plants. The plan was originally published in 1975. In 1978, a revised version was published under the voluntary concurrence program of NUREG-75/111. Following the Three Mile Island accident and the increased regulatory requirements resulting from that accident, the state plan has undergone extensive modification and revision. It has been the state's intent to meet or exceed, as applicable, those guidance criteria promulgated jointly by the U.S. Nuclear Regulatory Commission and the Federal Emergency Management Agency published as the "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," NUREG-0654/FEMA-REP-1, Rev. 1, November 1980.

The state offsite emergency plan for Waterford 3 is a document containing two major parts. The first is that portion applicable to state responsibilities and jurisdictions. The second major portion, known as Attachment 1, concerns local governmental responsibilities. Attachment 1 is further subdivided into three major categories. The first is that of a basic plan that is common to both parishes involved in the planning process for the 10-mile plume exposure pathway emergency planning zone. The second major subdivision is Enclosure 1, which constitutes the portion of the emergency plan which is unique to St. Charles Parish. The third and final section is Enclosure 2, the portion which is unique to St. John the Baptist Parish. None of these parts stands alone to comprise a plan in and of itself. The plan is comprised of the four parts together. The Waterford 3 site-specific plan is essentially complete in its development, but it is subject to further changes or revisions as improvements or refinements may be indicated.

Q. What has been your role in the development of the emergency plan?

A. During the last 21 months I have had responsibility for assuring that the State of Louisiana and its local governmental jurisdictions have developed a coordinated plan that is responsive to the needs of any potential radiological accident, and assuring that a response organization exists that

will adequately protect the public health, safety and welfare of all citizens in the State of Louisiana.

Q. Have you reviewed the emergency plan including the parish attachments against the evaluation criteria in NUREG-0654/FEMA-REP-1, Rev. 1?

A. Yes, I have reviewed the emergency plan against the evaluation criteria in NUREG-0654/FEMA-REP-1, Rev. 1.

Q. Does the emergency plan meet those evaluation criteria relating to evacuation of the general public for the 10-mile plume exposure pathway emergency planning zone?

A. Yes. The plan does adequately address those criteria relating to evacuation of the general public from the 10-mile plume exposure pathway emergency planning zone.

Q. Joint Intervenors have alleged in Contention 17/26(1)(a) that the provisions of the emergency plan for notifying residents of the evacuation procedures are inadequate. Please describe the evacuation information to be provided and provisions for providing that information as called for in the emergency plan.

A. Evacuation information to be provided will be in the form of a public information brochure distributed annually. Also, this information will be available at public points of interest that are commonly visited by transient members of the population, such as hotels, motels, post offices, libraries,

informational kiosks in public recreational areas, boat landings and other public places. The brochure will provide evacuation-related information, and information involving other protective actions, as well as a general description of what will be requested of the public in case of an emergency. In addition, if evacuation as a protective action were the decision of choice, and a recommendation were issued, instructions would be made available via local broadcast media and the Emergency Broadcast System (EBS) to those affected members of the population within the 10-mile plume exposure pathway emergency planning zone. The brochure will instruct the public to turn to local radio or cable TV stations upon the sounding of a siren and tone alert public emergency notification system, which is to be certified by FEMA according to guidance criteria found in NUREG-0654/FEMA-REP-1, Rev. 1.

Q. In your opinion, does the emergency plan provide adequate provisions for notifying residents?

A. Yes, in my opinion the notification will be adequate.

Q. Joint Intervenors have alleged in Contention 17/26(1)(c) that "the evacuation warning system is inadequate." Please describe the evacuation warning system for the Waterford 3 10-mile EPZ.

A. The evacuation warning system is a combined siren and tone-alert system, operated in conjunction with the

EBS and local broadcast stations. This system will utilize state-of-the-art equipment and will be installed prior to operation of Waterford 3.

Q. Does the evacuation warning system described in the emergency plan have the capacity for providing both an alert signal and an informational or instructional message to the population on an area-wide basis throughout the 10-mile EPZ within 15 minutes?

A. Yes, in my opinion it does. The Federal Emergency Management Agency (FEMA) has the final responsibility for certifying the adequacy of this system after it is installed.

Q. Does the initial notification system described in the emergency plan assure direct coverage of essentially 100% of the population within five miles of the site?

A. Yes, essentially 100% of the population within five miles of the site will receive coverage from the initial notification system.

Q. Does the emergency plan provide that special arrangements will be made to assure 100% coverage within 45 minutes of the population who may not have received the initial notification within the entire plume exposure EPZ? If so, please describe such special arrangements.

A. Yes, the emergency plan does provide special arrangements for notification of 100% of the population within

45 minutes of the initial notification message. These means are provided for through agreement with the Louisiana Department of Wildlife and Fisheries and the Louisiana Department of Public Safety to use both boat and helicopter means of transportation with public address systems to notify transient individuals within the population. Also, through the Port of New Orleans Coast Guard facility, river traffic is notified. Air traffic, except for emergency purposes, is closed down over the area through an agreement with the FAA and notification through its Houston regional office.

Q. In your opinion, does the emergency plan provide for an adequate evacuation warning system?

A. Yes, in my opinion the system is adequate.

Q. Joint Intervenors have alleged in Contention 17/26(1)(d) that "there is not an adequate command decision structure, including appropriate guidance, for commencing evacuation." Please discuss the process in the emergency plan for making the decision to evacuate and providing the decision makers with guidance in making that decision.

A. The decision to evacuate is made by the chief executive officer of each parish. To assist him in making this decision, he will be provided with information and protective action recommendations from both the Waterford 3 plant and from the state. The utility gives information simultaneously to both the parish and state government over the operational hot

line. Louisiana Nuclear Energy Division receives this information as well as information from its own field teams and assessment procedures and makes recommendations to the Assistant Secretary of the Office of Environmental Affairs (ASOEA) regarding any protective action. The ASOEA formulates the state recommendation for protective action based on the information available. The state recommendation is then tendered to the local government by LNED.

Q. In your opinion, does the plan provide an adequate command decision structure including appropriate guidance for commencing evacuation?

A. Yes, in my opinion an adequate command decision structure is provided, and adequate guidance for evaluation of accident conditions is provided. See Chapter 7, "Protective Response," of the State Plan.

Q. Joint Intervenors have alleged that the emergency plan "fails to provide for realistic and comprehensive evacuation drills in that provisions for moving individuals are not actually tested." Please comment.

A. Federal guidance and regulations do not require the actual movement of members of the general public in the performance of exercises and drills. The exercise will activate and test the notifications, primary communications, accident assessment, data gathering, logistical support and protective response functions. Actual movement of people,

however, is neither necessary nor desirable, particularly in view of the risk and inconvenience to the general public if required to participate in such drills.

Q. In your opinion, does the emergency plan provide for effective evacuation exercises which meet federal requirements and guidelines?

A. Yes, in my opinion the plan meets or exceeds federal requirements and guidelines.

Q. Joint Intervenors have alleged in Contention 17/26(1)(e) that "procedures are inadequate for evacuation of people who are: i) without vehicles, ii) school children, iii) aged or crippled, iv) sick and hospitalized, v) imprisoned, or vi) transient workers." Please comment.

A. People without vehicles will be instructed to go to predesignated pickup points where transportation will be provided for them. Local civil defense directors will have lists of people who may have physical difficulty getting to these predesignated pickup points, and special transportation arrangements will be made for them. School children will be provided with bus transportation to relocation centers in the support parishes. Sick and hospitalized people will be provided for by the respective hospital institutions in which they are presently residing. Internal procedures are provided for the quick discharge of those patients who are not in critical medical need and are able to evacuate themselves.

Transportation will be provided for hospital patients to be evacuated, by local ambulance services and supplemental vehicles as needed. Local hospitals in the 10-mile EPZ have agreements with hospitals in support parishes to accept evacuated patients. Local sheriffs have agreements with sheriff's offices of adjacent support parishes for the acceptance of prisoners in the case of an evacuation recommendation. Transient workers with transportation are generally assumed to use their own transportation in the evacuation. Those without transportation will either get transportation from co-workers or will report to predesignated pickup points for transportation to be provided for them.

Q. In your opinion, are there adequate procedures for taking protective actions with respect to these groups of people?

A. Yes, in my opinion, provisions for taking protective actions with respect to these groups of people with special needs are adequate.

Q. Joint Intervenors have alleged that there are inadequate provisions in the emergency plan for "distribution and/or storage of potassium iodide in accordance with accepted public health practice in the locations which are readily accessible to affected individuals as protection against thyroid radiation." Please describe the State of Louisiana's policy for the use of potassium iodide in the event of a radiological accident and the rationale for that policy.

A. The state's current policy regarding the use of potassium iodide as a radioprotective drug is to provide it for emergency workers and institutionalized persons, as appropriate, but not for use by the general public. However, the state is continually monitoring new developments regarding the issuance of national or regional policies regarding the use of potassium iodide in the event of an emergency for the prophylaxis of exposure to radioiodine. In developing its policy the state took into consideration the availability of potassium iodide, its limited shelf life, its cost, likelihood of need, problems inherent in predistribution, the risks of administration to those individuals that might be allergic to the substance, and the false sense of security which the availability of potassium iodide might create (inhibiting implementation of other protective actions). The state's potassium iodide policy was developed with the assistance and concurrence of the State Health Officer.