

8/28/90

MEMORANDUM FOR: Frank J. Cengel
Director
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission

FROM: Richard W. Krizan
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Exercise Report of the March 31, 1987, Exercise of the
Ohio Offsite Radiological Emergency Preparedness Plans
for the Davis Besse Nuclear Power Station.

This is to transmit a copy of the Exercise Report of the March 31, 1987, joint exercise of the offsite radiological emergency preparedness plans for the Davis Besse Nuclear Power Station, located in Ottawa County, near the Town of Oak Harbor, Ohio. This was a joint exercise for the State of Ohio (partial participation), Ottawa County (full), Lucas County (full), Erie County (relocation center) and Toledo Edison Company. The counties impacted by the Davis Besse plume exposure 10-mile Emergency Planning Zone (EPZ). The report dated May 18, 1987, was prepared by the Federal Emergency Management Agency (FEMA) Region V.

In the March 31, 1987, exercise there were two Areas Requiring Corrective Action (ARCA) observed. A copy of this report was forwarded to the State of Ohio. On May 12, 1987, the State of Ohio responded with a schedule of corrective actions which was reviewed and approved by FEMA Region V as indicated in the attached memorandum dated May 18, 1987. The State policy on KI, mentioned in that memorandum, was finalized on May 22, 1987.

Based on the results of the exercise activity, it is FEMA's view that there is reasonable assurance that offsite preparedness is adequate to protect the public health and safety in the Davis Besse emergency planning zone.

If you have any questions, please contact Mr. Robert S. Wilkerson at 646-2360.

Attachment
As Stated

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FINAL

THIS IS THE 1987 DAVIS BESSE EXERCISE REPORT

FINAL

Davis Besse Nuclear Power Station
Toledo Edison Company
Joint Exercise

Facility Location: Located in the State of Ohio, Ottawa County, near
the Town of Oak Harbor, Ohio.

Exercise Date: March 31, 1987

Date of Draft Report: April 20, 1987

Date of Final Report: May 18, 1987

Participants: State of Ohio (partial), Ottawa County (full), Lucas
County (full), Erie County (relocation center) and
the Toledo Edison Company (full)

Federal Emergency Management Agency
Region V
Natural and Technological Hazards Division
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EXECUTIVE SUMMARY

General

The purpose of the Executive Summary is to provide an overview of the findings for the offsite evaluation of the State of Ohio and Ottawa, Erie and Lucas Counties during the March 31, 1987 radiological emergency preparedness joint exercise at the Davis Besse Nuclear Power Station (DBNPS). Issues identified in this report will be identified as being in one of the following categories:

Deficiency: If this event happened or failed to happen during a real emergency public health and safety would have been adversely affected.

Area Requiring Corrective Action: The event observed during the exercise would not affect public health and safety if it had occurred during a real emergency. The issue is serious enough, though, for FEMA to require a schedule of corrective action.

Areas Recommended for Improvement: The event observed during the exercise would not affect public health and safety if it had occurred during a real emergency. The issue is brought to the attention of State or local government as a recommendation to improve plans and operations. No schedule of corrective action is required by FEMA.

The DBNPS radiological emergency preparedness joint exercise was conducted on March 31, 1987 during normal duty hours. The exercise participants critique was held by FEMA at the DBNPS Administration Building at 1:00 on April 2, 1987. The public and media briefing was held jointly by FEMA and NRC at 3:00 at the same location.

State of Ohio

The State of Ohio selected twenty-three (23) objectives to be demonstrated during the exercise. No deficiencies were identified. There were two (2) areas requiring corrective action identified. Four (4) recommendations for improvement are offered for consideration by the State of Ohio.

This was a partial participation exercise for the State of Ohio, with only the communications, dose assessment and public information sections being fully staffed. The ODSA was able to effectively activate these three sections of the State EOC following receipt and verification of the ALERT notification. The ODSA, OEPA, ODOH, Governor's representative and Toledo Edison liason were present in the State EOC. Staff assigned to the ECC, the JPIC and field monitoring teams were also mobilized and dispatched at the ALERT level. 24-hour staffing capability was evidenced by double staffing or by presentation of a roster.

The ODSA Deputy Director was effectively in charge of the EOC operations. The dose assessment group and the communications group worked well together, with the communications group receiving the information from the field teams and forwarding it to the dose assessment group. Message handling was efficient. The State of Ohio requested federal assistance from both the DOE and FEMA.

The EOC facilities and amenities are adequate to support the emergency response activities. There was a dedicated telephone, datafax, commercial telephone and ODSA radio net available to support communications with the various locations and organizations responding to the simulated emergency at the DBNPS. All of the above communications systems were effectively demonstrated during the exercise, particularly radio communications with the communications van and the field monitoring teams. There was space set aside in the EOC at the DBNPS Administration Building for the State and Ottawa County. The State and County had full access to the displays and for consultation with utility personnel in the EOC.

The dose assessment room in the EOC was adequate for performing the functions assigned to the staff located there. Noteworthy is the microcomputer for performing dispersion calculations. The computer also maintains a data base of population density and evacuation studies that is useful for making protective action recommendations. These recommendations were also based on plant conditions, data from the field monitoring teams and predetermined actions associated with emergency classification levels. The dose assessment group provided timely protective action recommendations to the Counties on three occasions during the exercise. The Counties initiated public alerting and notification based on the recommendations they received from the State and the utility.

ODSA and OEPA mobilized field monitoring teams from Columbus and Bowling Green, respectively. The teams were properly equipped and demonstrated the appropriate procedures for air, soil, vegetation and surface water sample collection. The opportunity to demonstrate snow collection procedures was missed. It is recommended that the field monitoring SOPs describe in greater detail the recently modified operating procedures for the multi-purpose survey instrument. It is also recommended that the State of Ohio review its field monitoring training and procedures to determine if they should be revised to reduce the potential for contamination of equipment.

The ODOH Northwest District Office demonstrated milk sampling procedures during the exercise. The team was properly equipped for sampling milk, had personal dosimetry, maps and SOPs, and performed their duties in a professional and effective manner. It is recommended that the milk sampling team be equipped with a two-way radio to facilitate communications.

All samples collected were taken to the Fremont Airport where the samples were consolidated, screened by the ODOH staff, transferred to an Ohio National Guard helicopter and transported to Columbus for laboratory analysis. The procedures for the transport of field monitoring samples should be reviewed with personnel of the Ohio National Guard.

Based on release rates provided by the utility and later confirmed by deposition measurements, the ODOH used plume dispersion models to make recommendations to dairy farmers. The ODOH maintains a data base on the sources of milk. The data base contains the location, owners name, and telephone number for dairy farms and processing plants.

The field monitoring teams were equipped with dosimetry kits containing personal dosimeters, record cards, dosimeter chargers and TLDs. They were knowledgeable of exposure limits, reading dosimeters and procedures for decontamination. Their radiological exposure was monitored by the field team director.

Based on its calculation of a potential thyroid dose in excess of 25 REM, the State of Ohio recommended the use of KI by institutionalized individuals and emergency workers in the plume EPZ in accordance with the current draft policy. This policy does not recommend the use of KI by the general public. However, the distribution of KI could not be fully demonstrated because the State has not uniformly resolved its policy concerning the use of KI by institutionalized individuals and by emergency workers within the various agencies. The current draft policy should be finalized and KI distributed in accordance with the final policy.

The State has the capability to brief the media at the State EOC, however, there was no media present during the exercise. All media briefings were handled at the JPIC which is located in the DBNPS Administration Building. During the exercise there was a simulated JPIC relocation to the alternate JPIC at the Toledo Edison corporate office in downtown Toledo. It is recommended that this alternate JPIC be utilized during a future radiological emergency preparedness joint exercise.

The JPIC facility has sufficient space and resources to accommodate the various PIOs and the media. During the exercise six (6) media briefings were conducted. The PIOs effectively coordinated the information to be presented to the media prior to the briefing. There was a separate room set aside for this purpose. Twenty-four (24) periodic news releases were also distributed at the JPIC. These releases were well coordinated and contained general information and information from the County EBS messages.

Rumor control was established at the JPIC. The rumor control staff was effective in coordinating responses to simulated public inquiries. The State, County and utility rumor control telephone numbers were provided during briefings and in the news releases at the JPIC.

Ottawa County

Ottawa County selected twenty-four (24) objectives to be demonstrated during the exercise. All of the objectives were successfully demonstrated by Ottawa County. No deficiencies, areas requiring corrective action or recommendations were identified.

The Ottawa County EOC consisting of the Executive Group and the operational staff mobilized their staff and activated the EOC according to their plan. Around the clock staffing capability was demonstrated by the presentation of a roster or by double staffing.

Their facility is located in the basement of the Ottawa County Courthouse Annex and is a facility which has been specially designed and equipped to support the staff during emergencies. Classification levels were posted, status boards were maintained and all of the appropriate maps and displays were posted. The staff is well trained and demonstrated an effective response capability to deal with the DBNPS emergency as well as additional minor emergencies that were simulated to have occurred during the incident at the utility.

The President, Ottawa County Board of Commissioners, was effectively in charge of Ottawa County actions. The EOC staff were involved in the decision making process and Ottawa County emergency activities were coordinated with Lucas County.

The staff, utilizing primary as well as alternate means of communication, demonstrated their ability to coordinate with those organizations intended to provide support to the emergency response. There were two dedicated telephone systems in use. One system interlinks the utility with the State of Ohio, Ottawa County and Lucas County. The second system interlinks Lucas County with Ottawa County. Commercial telephone was the primary means of communication for the EOC staff. ARES radios were utilized as backup to contact field locations such as reception and congregate care centers and the decontamination station.

The County effectively acted on three protective action recommendations which included activating the siren system and by providing emergency instructions to the public through EBS. In each case siren and EBS activation were coordinated with Lucas County and accomplished within fifteen minutes. The affected areas were described in terms of familiar boundaries and landmarks. Appropriate information to evacuees, transients and sheltered populations was provided in the EBS messages.

Utilizing existing inclement weather conditions, experienced during the exercise, the staff prepared themselves to deal with any impediments which could be experienced while implementing any combination of protective action recommendations.

The County ensured that media releases at the JPIC were coordinated and that EBS messages were concise. A rumor control system was established in the EOC to respond to inquiries from concerned citizens.

Should evacuation occur, the County is able to establish control points to monitor access to the affected areas. Two traffic control points were established in the field during the exercise.

The Benton-Carroll-Salem School District and the Carroll Elementary School participated in alerting and activating their school evacuation plan. The demonstration included mobilizing and equipping bus drivers to carry out their evacuation procedures. The students at the Carroll School were loaded into their buses. The school facility was secured and a notice left for parents identify the location of their children.

An emergency worker decontamination station was demonstrated at the Clay-Genoa Volunteer Fire Department. The staff demonstrated proficiency in the use of equipment and the procedures for the decontamination of emergency workers and their vehicles. The corrective action for a weakness from the previous exercise was demonstrated and the weakness did not recur.

A Mid-County EMS ambulance crew demonstrated the equipment and procedures for effectively handling a contaminated injured individual. The ambulance crew was well trained and properly equipped.

In a separate medical drill conducted on September 11, 1986, the Emergency Room staff of the Fremont Memorial Hospital in Fremont demonstrated the facilities and procedures for handling a contaminated injured individual. The hospital staff were knowledgeable of their responsibilities and capably demonstrated the treatment and decontamination of the patient. A Carroll Township EMS ambulance crew demonstrated the equipment and procedures for effectively handling a contaminated injured individual. The ambulance crew was well trained and properly equipped.

Officials at the Ottawa National Wildlife Refuge, the Crane Creek State Park and the Crane Creek Wildlife Experiment Station were interviewed during the exercise. Message logs indicated that notification had been received from both the Ottawa County Sheriff and the ODSA during the ALERT classification as per the plan. The Officers-in-Charge had SOP manuals and personal dosimetry kits. They were knowledgeable of the necessary protective actions and had received appropriate training. Public instructions would be provided by various means including bullhorns, boats and public address systems in vehicles.

Emergency workers performing tasks in the field were checked to see if adequate procedures were implemented to provide them with adequate personal dosimetry. Dosimetry kits contained the appropriate dosimetry and emergency workers were aware of their responsibility to report hourly readings to the responsible officials. In the absence of the final State procedures for the use of KI and a supply of KI, Ottawa County simulated the issuance and administering of KI by emergency workers when instructed to do so by the State.

Although it was not an exercise objective the executive group as well as interested staff remained in the EOC after completion of the exercise to discuss the procedures they may anticipate while implementing recovery and reentry procedures. They discussed procedures for returning their community to a normal condition as quickly as possible while ensuring that the health and welfare of the affected population was well cared for.

Erie County

Erie County served as a host County for some of the simulated Ottawa County evacuees. As such there were no exercise objectives specifically selected by Erie County. However, the two (2) objectives related to the relocation and congregate care centers selected by Ottawa County were also evaluated in Erie County. No deficiencies or areas requiring corrective action were identified. Two (2) recommendations for improvement are offered for consideration by Erie County as well as other host Counties.

The Erie County EOC was activated following receipt of the SITE AREA EMERGENCY notification from Ottawa County. The responsibility of the EOC staff was to coordinate emergency services (law enforcement, fire and rescue) and facilitate the activation and operation of the reception and congregate care centers. Telephones and radios were the primary means of communication between the Erie County EOC and the field locations as well as Ottawa County.

Once the Erie County EOC was activated, the EOC staff placed appropriate reception and congregate care center personnel on standby. The reception center was located at the Sandusky High School and the congregate care center at the Jackson Junior High School. These two facilities were activated within one hour of the receipt of the GENERAL EMERGENCY notification.

Simulated evacuees were monitored, decontaminated, as appropriate, and registered at the relocation center and then transported to the congregate care center. The congregate care facility was adequate to house the 200 evacuees as stated in the plan. The facility was laid out with a nursing

station, kitchen facilities, recreation area, sleeping areas, shower and toilet facilities, and separate areas for mothers with infants and people with illnesses. The staff conducting the activities at both centers were knowledgeable of their emergency responsibilities and demonstrated a high level of training as they effectively carried out their assignments.

It is recommended that JPIC news releases be routinely distributed to the host Counties, either to the EOC or directly to the congregate care centers. This information would be of interest to evacuees and useful for the handling of rumor control at the care centers.

There were significant periods of inactivity in the EOC and following field demonstrations during the exercise. It is recommended that the controllers inject "free play" activities to drive actions by the staff during these periods and that consideration be given to terminating field activities once the objectives have been demonstrated and the evaluation at that location is complete.

Lucas County

Lucas County selected twenty-four (24) objectives to be demonstrated during the exercise. All of the objectives were successfully demonstrated by Lucas County. No deficiencies or areas requiring corrective action were identified. Four (4) recommendations for improvement are offered for consideration by Lucas County.

Partial mobilization of the Lucas County EOC staff began when the DBNPS informed the Lucas County Sheriff's dispatch center that an UNUSUAL EVENT had occurred. Partial activation of the EOC began following receipt of the ALERT notification from the utility. Completion of the EOC activation occurred after receipt of the SITE AREA EMERGENCY notification. The EOC was fully staffed with around the clock staffing capability demonstrated by presentation of a roster of replacement staff.

The Lucas County EOC Executive Group consists of the thru Lucas County Board of Commissioners, the Lucas County Sheriff, the Lucas County Disaster Services Director, and a Jerusalem Township Trustee. The Mayors of the Cities of Oregon and Toledo are optional members of the Lucas County Executive Group.

The President, Lucas County Board of Commissioners, was effectively in charge of Lucas County actions. The EOC staff were involved in the decision making process and Lucas County emergency activities were coordinated with Ottawa County. It is recommended that the EOC staff be more involved in making presentations of their key response activities during EOC briefings.

The newly developed EOC is located in the sub-basement of the Lucas County Correctional Facility in Toledo. This facility is spacious, well lighted with sufficient amenities to support emergency staff for an extended period of time. Classification levels were posted, status boards were maintained and all of the appropriate maps and displays were posted.

There were two dedicated telephone systems in use. One system interlinks the utility with the State of Ohio, Ottawa County and Lucas County. The second system interlinks Lucas County with Ottawa County. Commercial telephone was the primary means of communication for the EOC staff. ARES radios were utilized as backup to contact field locations such as reception and congregate care centers and the decontamination station. County Sheriff's dispatch center radios provide a means of backup communication. Not all of the planned radio systems are currently installed. They are scheduled for installation in the near future. There was a hard copy datafax capability to the JPIC, Ottawa County and the State EOC.

Lucas County considered both the utility and the State protective action recommendations and other factors such as plant status, evacuation time estimates and weather in formulating the protective actions taken by the County. Three protective actions to shelter and/or evacuate people and shelter livestock were implemented by the County during the exercise.

The County initiated action to promptly alert and notify the public of protective action recommendations three times during the exercise. In each case siren and EBS activation were coordinated with Ottawa County and accomplished with fifteen minutes. The affected areas were described in terms of familiar boundaries and landmarks. Appropriate information to evacuees, transients and sheltered populations was provided in the EBS messages and the news releases at the JPIC.

The EOC staff determined the appropriate traffic and access control points for each protective action recommendation. One access control point was manned by the Sheriff's Department. The deputy was knowledgeable about his duties, evacuation routes and the location of the reception and congregate care centers and the decontamination station. He had the appropriate dosimetry and was knowledgeable about its use, reporting requirements and the maximum allowable exposure levels.

Each agency had a Dosimetry Coordinator who maintains a written record of their workers' radiological exposure. Each emergency worker was instructed to provide hourly reports of exposure to his Dosimetry Coordinator. The Dosimetry Coordinators were instructed to contact the Lucas County Radiological Operations Officer only if readings reached 1, 5 or 15 rads. It is recommended that each Dosimetry Coordinator provide periodic status reports to the Radiological Operations Officer so that he can monitor emergency worker exposure levels and ensure that effective monitoring is being accomplished.

In the absence of the final State procedures for the use of KI and a supply of KI, Lucas County simulated the issuance and administering of KI by emergency workers when instructed to do so by the State.

A simulated traffic obstruction on SR2 was handled by the EOC staff. Traffic was routed around the obstruction until its simulated removal by the Ohio National Guard.

A list of mobility impaired individuals is maintained by the Jerusalem Township Fire Department. Transportation for the simulated evacuation of the mobility impaired individuals was provided by the Regional Emergency Medical Services of Northern Ohio (REMSNO).

There are no schools within the Lucas County portion of the 10-mile EPZ. As a precaution, the Jerusalem Elementary School was relocated to the Eisenhower Junior High School. Relocation procedures were reviewed with the Superintendent, the Transportation Director and the Business Manager of the Oregon School System, the principals of the two schools and a bus driver. It is recommended that the name of the Dosimetry Coordinator and the policy that no room teachers accompany their students be specified in the SOPs.

Following receipt of the SITE AREA EMERGENCY notification the EOC staff placed appropriate reception and congregate care center and decontamination station personnel on standby. Activation of these facilities was initiated after receipt of the GENERAL EMERGENCY notification and were fully activated within an hour.

The City of Oregon Fire Department and Lucas County Human Services demonstrated the procedures for radiological monitoring, decontamination and registration of a simulated evacuee at the reception center which was located at the Eisenhower Junior High School in Oregon. The staff conducting these activities were knowledgeable of their duties and demonstrated the capability to carry out their assignments reflecting a high level of prior training. The radiological monitoring staff was equipped with personal dosimetry and were knowledgeable about its use.

Once registered evacuees would be transported to a congregate care center by bus. One such facility was demonstrated at the Clay High School in Oregon which was staffed by the Red Cross. The facility had access to sufficient resources to handle the 230 simulated evacuees. The staff was knowledgeable of their emergency responsibilities.

An emergency worker decontamination station was demonstrated at the Jerusalem Township Fire Department. The appropriate resources for decontamination of personnel and vehicles are maintained at this facility. The staff demonstrated proficiency in the use of equipment and the procedures for the decontamination of two emergency workers and one vehicle.

The Jerusalem Township Fire Department also demonstrated the equipment and procedures to handle and transport a contaminated injured individual. The ambulance crew was well trained and properly equipped. They demonstrated the capability of establishing communications with the appropriate hospital, the Lucas County EOC and a traffic control point.

In a separate medical drill, the Emergency Room staff of the St. Charles Hospital in Oregon demonstrated the facilities and procedures for handling a contaminated injured individual. The hospital staff were knowledgeable of their responsibilities and capably demonstrated the treatment and decontamination of the patient.

The Lucas County public information liaison in the EOC coordinated information with the Lucas County PIO at the JPIC. Rumor control activities were also coordinated with the Lucas County PIO at the JPIC. A rumor control station was established in the EOC and its telephone number announced over EBS, in news releases and at JPIC briefings. The Lucas County PIO demonstrated adequate training and knowledge of his duties. He effectively coordinated information with the other spokespersons at the JPIC and participated in all of the JPIC briefings.

There were significant periods of inactivity in the EOC and following field demonstrations during the exercise. It is recommended that the controllers inject "free play" activities to drive actions by the staff during these periods and that consideration be given to terminating field activities once the objectives have been demonstrated and the evaluation at that location is complete.

EXERCISE REPORT

Introduction

1. Exercise Background

This was the fourth joint exercise for the State of Ohio and Ottawa County resulting from a simulated accident at the Davis Besse Nuclear Power Station. It is the first exercise that involved full participation by Lucas County.

The first joint exercise was on November 6, 1980 and involved full participation by both the State of Ohio and Ottawa County. The second joint exercise for the State and Ottawa County was on April 13-14, 1983 and involved a partial participation by the State of Ohio and full participation by Ottawa County. The third joint exercise was July 16, 1985 and involved full participation for the State and Ottawa County. Sandusky County demonstrated their capability to serve as a host County for evacuees. This report addresses the most recent March 31, 1987 joint exercise involving partial participation for the State of Ohio and full participation for Ottawa and Lucas Counties. Erie County demonstrated their capability to serve as a host County for evacuees.

2. Participating and Non-participating State and Local Governments

The 10-mile plume exposure EPZ of the Davis Besse Nuclear Power Station impacts primarily on Ottawa County. It also impacts on a portion of Jerusalem Township within Lucas County and a portion of Lake Erie. The exercise was partial participation for the State of Ohio and full participation for Ottawa and Lucas Counties. Erie County participated by activating their EOC, a reception center and a congregate care center.

3. List of Evaluators

For this exercise there was a total of sixteen (16) federal evaluators observing offsite exercise activities. Onsite activities were evaluated by a separate team from the Nuclear Regulatory Commission (NRC). The offsite federal evaluation team was composed of seven (7) evaluators from FEMA, two (2) from the Environmental Protection Agency (EPA), one (1) from the Department of Energy (DOE), one (1) from the Department of Agriculture (USDA) and five (5) from the Center for Planning and Research (CPR) which provides contract support to FEMA for exercise evaluation. The evaluator assignments and agencies were as follows:

Offsite Exercise Evaluation Team Director
Wallace Weaver, FEMA

State of Ohio Evaluation Team
Ed Robinson, Team Leader, FEMA, State EOC
Steve Kouba, DOE, State EOC
Don Harris, CPR, JPIC
Ed Sears, CPR, ECC
Larry Jensen, EPA, Field Monitoring Teams and Communications Van
Deborah Arenberg, EPA, Field Monitoring Teams and Communications Van
Dottie Nevitt, USDA, Milk Sampling

Ottawa County Evaluation Team

Bob Shapiro, Team Leader, FEMA, County EOC
Ray Kellogg, FEMA, County EOC, School Evacuation, Traffic Control
Don Harris, CPR, JPIC
Woodie Curtis, FEMA, Decontamination Station, Medical Support (Mid-County EMS Ambulance), Medical Support (Fremont Hospital on 9-11-86)
Dottie Nevitt, USDA, Planning for Park Evacuation

Erie County Evaluation Team

Bill Small, CPR, County EOC, Reception and Congregate Care Centers

Lucas County Evaluation Team

Dan Bement, Team Leader, FEMA, County EOC
Paul Bungard, CPR, County EOC, Decontamination Station, Medical Support (Jerusalem Township Fire Department Ambulance)
Ed Hakala, CPR, County EOC, School Evacuation
Don Harris, CPR, JPIC
Dick Meyer, FEMA, Reception and Congregate Care Centers, Traffic Control
Woodie Curtis, FEMA, Medical Support (St. Charles Hospital)

4. Evaluation Criteria

The plans that were evaluated by this exercise were developed using the "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants" (NUREG-0654/FEMA REP-1, Revision 1). Therefore, these criteria and the modules based on these criteria entitled, "Modular Format for Uniformity of Radiological Emergency Preparedness Exercise Observations and Evaluation," dated June 1983, were used for exercise evaluation.

5. Exercise Objectives

The objectives selected by the State of Ohio and Lucas, Ottawa and Erie Counties are listed in Attachment 1.

6. Summary of Scenario

The Davis Besse Nuclear Power Station radiological emergency preparedness exercise objectives and scenario for the March 31, 1987 partial participation joint exercise were developed by exercise planners from the Davis Besse Nuclear Power Station and the State of Ohio Disaster Services Agency. The exercise planners did not participate in the exercise and protected the scenario from the participants of the exercise so they would not be aware of the scenario events.

FEMA Region V conducted discussions with the utility and State planners to select the objectives and determine the scope of the exercise. During the pre-exercise scenario development period it was decided to emphasize the alerting, mobilization and activation of staff and not emphasize or evaluate the recovery and reentry portion of the exercise. Review of previous exercise weaknesses was made by FEMA Region V and the scenario writers in order to develop a scenario that would allow for the demonstration of corrective actions for past exercise weaknesses as well as allow for the demonstration of the objectives selected by the exercise participants.

Submission of the scenario was according to deadlines outlined in NRC and FEMA guidelines. Idaho National Engineering Laboratory reviewed the offsite portion of the scenario for FEMA and found it to be adequate to exercise the objectives selected by Ottawa, Lucas and Erie Counties as well as those selected by the State of Ohio. The exercise scenario is included with this exercise report as Attachment 2.

The exercise events followed the pre-exercise scenario. The UNUSUAL EVENT was declared at 0655, the ALERT at 0803, the SITE AREA EMERGENCY at 1106 and the GENERAL EMERGENCY at 1309. The Governor of Ohio declared a State of Emergency at 1120. Recovery and reentry was not an objective selected to be demonstrated during the exercise and therefore was not evaluated. The simulated accident at the Davis Besse Nuclear Power Station resulted in both sheltering and evacuation protective action recommendations as well as recommendations for dairy animals.

7. State and Local Resources Planned to be Used in the Exercise

The Ohio Disaster Services Agency in coordination with the Ohio Department of Health and the Ohio Environmental Protection Agency planned to staff and demonstrate their capabilities for communications, dose assessment and public information at the State EOC in Worthington; the JPIC and the EOC at the plant site; field monitoring teams; the communications van; and milk sampling.

Ottawa County planned to demonstrate its EOC; staffing at the JPIC; traffic control; school evacuation; medical support (Mid-County EMS ambulance); and a decontamination center. The County also chose to demonstrate its capability (simulated) to activate the prompt alert and notification systems, the emergency broadcast system, and evacuate a part of the 10-mile EPZ. A separate medical support drill was conducted on September 11, 1986 for the Fremont Hospital.

Erie County planned to demonstrate its EOC; a reception center; and a congregate care center.

Lucas County planned to demonstrate its EOC; staffing at the JPIC; traffic control; school evacuation; medical support (Jerusalem Township Fire Department ambulance and St. Charles Hospital); a reception center; a congregate care center; and a decontamination center. The County also chose to demonstrate its capability (simulated) to activate the prompt alert and notification systems, the emergency broadcast system, and evacuate a part of the 10-mile EPZ.

8. Exercise Findings in Past Exercises

There were no deficiencies noted for the State of Ohio and Ottawa County during the radiological emergency preparedness exercise of July 16, 1985. There were two (2) areas requiring corrective action identified, one each for the State of Ohio and Ottawa County. Both of the areas requiring corrective action have been corrected. The Ottawa County corrective action (NUREG-0654 criteria item K.3.b) was successfully demonstrated during this exercise and the State of Ohio corrective action (NUREG-0654 criteria item J.11) was demonstrated during the November 1986 full participation exercise.

9. Exercise Objectives Still to be Effectively Achieved

This exercise begins a new six (6) year exercise cycle for the State and local governments in the vicinity of the Davis Besse Nuclear Power Station. The State of Ohio has chosen to follow the nomenclature of draft Guidance Memorandum EX-3 for tracking exercise objectives during the current exercise cycle. The following exercise objectives have not yet been demonstrated during the current exercise cycle:

15. Demonstrate the ability to supply and administer KI, once the decision has been made to do so. (Ottawa County and Lucas County) Note: This demonstration was simulated during the exercise as the KI was not available to the Counties.

22. Demonstrate appropriate lab operation functions for measuring and analysing all types of samples. (State of Ohio)

34. Demonstrate ability to estimate total population exposure. (State of Ohio)

35. Demonstrate ability to determine and implement appropriate measures for controlled recovery and reentry.

Because of the weaknesses noted elsewhere in this report, the following exercise objectives were not completely demonstrated the State of Ohio. Appropriate action will be required to correct the exercise weaknesses and these objectives must be successfully demonstrated during a future radiological emergency preparedness exercise involving the State of Ohio.

The State of Ohio did not completely demonstrate the following objectives:

13. Demonstrate the ability to make the decision, based on predetermined criteria, to supply and administer KI to emergency workers.

14. Demonstrate the ability to make the decision, based on predetermined criteria, whether to issue KI to the general population, and supply and administer KI, once the decision has been made to do so.

15. Demonstrate the ability to supply and administer KI, once the decision has been made to do so.

21. Demonstrate appropriate equipment and procedures for collection and transport of samples of soil, vegetation, snow, water and milk.

Narrative

1. State of Ohio

Activation and Staffing

This was a partial participation exercise for the State of Ohio, with only the communications, dose assessment and public information sections being fully staffed. The State has a direct communication link with the utility which is monitored on a 24-hour basis. There was a call received from the utility informing the State EOC staff of a potential problem at the plant. The call was verified by a call back to the utility.

Upon receipt of the ALERT classification, ODSA initiated activation procedures for the dose assessment room. Organizations notified and subsequently reporting included ODSA, ODOH and OEPA. Around the clock staffing was demonstrated by the presentation of a roster. The dose assessment room was completely staffed at 0856, with the balance of the EOC completely operational by 1130.

A printed call list is used to notify the staff of an incident at the plant. If ODSA is unable to contact someone by telephone a pager system is utilized. The ODSA, ODOH, OEPA, Governor's representative and Toledo Edison liason were present in the EOC during the exercise. Some of the positions were double staffed to demonstrate the capability for 24-hour operations. A roster was presented to verify capability for the remainder of the positions. The State dispatched a person to the ECC to serve as a liaison between the ECC and the State EOC. The State's JPIC staff were also dispatched from Worthington.

The ODSA field monitoring teams were mobilized at the EOC in Worthington. The OEPA teams were mobilized in Bowling Green. Both groups were already at their routine work stations when activated. A system also exists to mobilize them from home. Mobilization was prompt and efficient with both agencies' teams assembling at the Fremont Airport. Upon arrival the teams reviewed their equipment boxes against checklists and were briefed on plant conditions. Three joint ODSA and OEPA teams were formed and dispatched to the field for sample collection.

Emergency Operations Management

The ODSA Deputy Director was in charge of the operations. Most of the activity took place within the dose assessment room and the communications room. The dose assessment staff were updated as the messages were received over the radio through the use of an in-house radio. When a message was received the lead person in the radio room would contact a person in the assessment room and relay the message. Based on plant condition, data received by the State's field monitoring teams and predetermined protective actions associated with classification levels the dose assessment group made protective action recommendations.

Message logs were kept by the communications and the dose assessment sections. There were ample people present for the purpose of message handling. The State EOC was notified of the ALERT at 0807, SITE AREA EMERGENCY at 1107 and GENERAL EMERGENCY at 1313.

At the SITE AREA EMERGENCY, the State EOC initiated notification calls that included the DOE Radiological Assistance Program in Chicago. They requested field monitoring teams, mobile labs and when time permitted, the entire FRMAC. The State of Ohio also requested administrative support from FEMA

Facilities

The State EOC facilities have been demonstrated on several occasions. They are functional, well maintained and provide an effective work area. The room used for dose assessment activities was fully equipped to perform the functions assigned. All required maps were either posted or immediately available. Status boards were maintained with current information on actions by the Counties and the utility. A microcomputer was available to perform dose assessment calculation. This microcomputer also contained a data base that was useful for making protective action recommendations.

The ECC is located in a secure area of the DBNPS Administration Building. The wall space is used for visual displays showing plant conditions that are visible from most positions in the ECC. The displays are continuously updated as new information is available. The State and Ottawa County liaisons had full access to all displays and consultations with utility employees. Briefings were conducted in the ECC following any significant changes in conditions.

Communications

The primary EOC communications system was the telephone (dedicated or commercial) with radio as backup. The communications system between the ECC and the State EOC consisted of a dedicated telephone, two alternate telephone exchanges and the ODSA radio net. The dedicated telephone was used to link the State EOC dose assessment area with the ECC and the radiological analysis area at each County EOC. This system was continuously monitored during the exercise.

The Federal agencies can be contacted by telephone with radio and telefax as backup. The EBS station can be contacted by telephone with the ODSA radio net as backup. The primary communications system to the JPIC was telephone which included datafax capability. The ODSA radio net and the ECC communications system can provide backup communications to the State EOC.

The State EOC staff were able to communicate with the field monitoring teams through the use of the ODSA radio net. The person directing radiological field monitoring teams had a portable radio link to the main radio dispatchers. However, should a problem arise, the radio dispatcher and field team dispatcher were located only 20 feet apart.

Field teams maintained constant contact with the communications van which in turn maintained contact with the State EOC. Communications were effective, although one field team experienced a dead spot utilizing a hand held radio. This problem was easily overcome by moving away from the immediate area of the dead spot. The communications van had sufficient capability to maintain full radio communications, provide backup communications equipment to the field teams and provide radio maintenance service in the field.

Dose Assessment and Protective Action Recommendations

The ODSA and the OEPA staff shared radiological monitoring responsibilities with ODSA taking air samples and OEPA taking soil, vegetation and water samples. Personnel from each agency assembled with all the necessary equipment to perform their assigned tasks. The field vehicles were large enough to handle all equipment and staff and operated well, even in a major snow storm on day of the drill. At least one team member was very familiar with the region and used a local map well to find collection points.

Collectively, the staff had all of the required radiation instrumentation with recent calibrations. Equipment was checked for operability at the time of activation and assembly. A radioactive check source is part of the ODSA field kit. Both the ODSA and OEPA teams had SOPs and seemed well trained in the use of the SOPs.

Air, soil, vegetation and surface water sample collection was demonstrated, including adequate collection procedures for radioiodines. ODSA demonstrated their ability to collect air samples on filters and cartridges with generator-driven air samples. ODSA used a portable generator to drive the air sampler. This required setting both on potentially contaminated ground. OEPA demonstrated their ability to collect vegetation, surface water and soil samples. Snow collection could have been demonstrated, but this assignment was not made by team controllers as the exercise scenario meteorology did not include snow. Therefore an opportunity to demonstrate this skill was missed. The OEPA team put equipment, sample bags and containers on the potentially contaminated ground while collecting and packaging samples. After completing the sampling the team changed contaminated booties at the back of the truck but then walked over potentially contaminated ground to enter the vehicle.

Area Recommended For Improvement: The State of Ohio should review its radiological monitoring training and procedures to determine if they should be revised to reduce the potential for contamination of equipment. For example, an air sampler taking a smaller sample and running off the van battery might reduce potential contamination problems, sample containers might be left in the van until needed, team members could work in unison to keep containers off the ground while collecting samples, and all staff should be fully aware of the need to limit contamination of their vehicle.

Field survey of samples for gamma and gamma/beta radiation was conducted. A multi-purpose survey instrument, the PRS-1 RASCAL, was used to conduct the survey. This instrument uses multiple probes calibrated on separate voltages. The instrument was adjusted for use in the field for dose rate (mr/hr) calculations. The voltage settings and other parameters which are labelled on each probe were adjusted as appropriate when the probes were changed. Most of the readings were taken as count rates (counts/minute) and were subsequently converted to dose rates at the State EOC. This reflected a recent modification to the operating procedures for the use of the various probes which eliminates the need for adjusting the internal instrument settings. However, these modifications are not detailed in the SOPs.

Area Recommended For Improvement: The field monitoring SOPs should be updated to incorporate the recent modification to the operating procedures of the multi-purpose survey instrument.

Samples were consolidated in one van, transported to the airport for screening by ODOH staff, transferred to an Ohio National Guard helicopter, and flown to Columbus for laboratory analysis. Screening procedures were adequate. However, a helicopter crew member reported that their orders prevent them from carrying any radioactive samples in their aircraft. The time required to collect samples and start them to Columbus for laboratory analysis appeared to be reasonable.

Area Requiring Corrective Action: (NUREG-0654 criteria item H.12) The procedures for the transport of field monitoring samples should be reviewed with personnel of the Ohio National Guard to ensure that all crew members are fully aware of their radiological emergency responsibilities.

For the most part, protective action recommendations were made using plant conditions and release rates supplied by the utility. A computer data base with time evacuation studies and population distribution was used to assist in making protective action recommendations.

Based on release rates and calculations that showed there was a potential to exceed 25 REM thyroid, the State recommended emergency workers and institutionalized individuals within the plume EPZ take KI based on its draft policy. This current draft policy is that KI will not be issued to the general public. The State does have adequate supplies of KI but have not yet distributed KI to the Counties and all State agencies pending actions by the State's legal body. Thus the procedures for the distribution of KI could not be fully demonstrated.

Area Requiring Corrective Action: (NUREG-0654 criteria items J.10.e and J.10.f) The State of Ohio should finalize its draft KI policy and demonstrate its implementation during their next full participation radiological emergency preparedness exercise.

Public Alerting and Instruction

Public alerting and instruction is a County function. However, the State of Ohio did demonstrate the ability to provide timely protective action recommendations to the Counties. For example the initial recommendation from the utility was received by the State at 1107 with the recommendation going to the Counties at 1115 and the Counties simulating the activation of the sirens and EBS at 1126.

Protective Action

Based on release rates provided by the utility (and later confirmed by field team deposition measurements) the ODOH used plume dispersion models to make recommendations to dairy farmers to place their animals on stored feed and non-surface water supplies. An extensive data base with farm location, owner and telephone number was available to the ODOH for implementing the recommendation.

A milk sampling team from the Northwest District Office by the ODOH demonstrated milk sampling procedures during the exercise. This team performed their sampling procedures in a timely and effective manner. The team deployed to the Ottawa County EOC at the ALERT classification level.

The team was equipped with the necessary sampling tools and demonstrated professional sampling methods during the milk sampling period. Operating procedures and maps were available, and the team used a checklist during the sampling procedure. The sample was taken to the Fremont Airport for transport to the State laboratory.

Area Recommended For Improvement: The milk sampling team should be provided with a two-way radio to facilitate communications in the event quick communication from or to the State or Counties is necessary.

Radiological Exposure Control

The individual responsible for directing the field monitoring teams monitored each team member's individual exposure. Field teams carry adequate protective equipment and were generally knowledgeable on how to use it. The field teams had a full range of pocket dosimeters with changers and carry TLDs. Field team members carry dosimeter records, are familiar with reading procedures, know authorized exposure limits, and know procedures for decontamination.

OEPA staff had KI while ODSA and ODOH staff did not. The issue over the use of KI has not been resolved for ODSA and ODOH staff. Presently one agency is allowed to carry and use KI while the other agency cannot. As discussed above, this problem is an area requiring corrective action by the State of Ohio.

The milk sampling team had the proper attire and dosimetry equipment for radiological exposure control. The team was knowledgeable in the use of dosimeters and keeping record cards.

Media Relations

The Public Information Officer was stationed in the State EOC with a counterpart located in the JPIC. If the need arose there was a large briefing room located within the armory complex. The necessary maps were available for use during a briefing session, however during this exercise there was no media present. They also had a media information packet available for the press.

The JPIC was located in the DBNPS Administration Building. Because of its proximity to the site, an alternate JPIC location has been established at the Toledo Edison corporate office in downtown Toledo. During the exercise a simulated JPIC relocation to this facility was implemented.

Area Recommended For Improvement: The alternate JPIC location at the Toledo Edison corporate office in downtown Toledo should be demonstrated during a future radiological emergency preparedness joint exercise.

The JPIC has sufficient space and resources to support the operations of the various PIOs and the media. There were appropriate maps and displays available to support the media briefings. A separate room was designated as a PIO briefing coordination room. Before each media briefing, the State, County and utility PIOs would meet to discuss the material to be presented and the sequence for presentation. This resulted in effectively coordinated briefings.

Six (6) media briefings were presented during the exercise with each PIO actively involved with the briefing. Because of the weather conditions and the diverse travel distance for the various PIOs, only the utility and Ottawa County PIOs were present for the first briefing. The Lucas County PIO arrived in time for the second briefing and the State PIO was present by the third briefing.

Periodic news releases, twenty-four (24) in all, were prepared and distributed from the JPIC. These news releases were also well coordinated prior to their issuance. In addition to providing general information, these news releases reinforced the instructions given to the public via EBS by including the EBS messages.

Rumor control was also established at the JPIC. The various telephone numbers for the utility, State and County rumor control staff were released at the JPIC both verbally during briefings and in the news releases. The JPIC rumor control staff was effective in coordinating responses to simulated calls from the public.

Recovery and Reentry

Recovery and reentry were not selected as objectives for this exercise.

Scenario

The scenario was adequate to allow the State of Ohio to fully demonstrate its objectives consistent with their partial participation.

2. Ottawa County

Activation and Staffing

The Ottawa County Sheriff dispatch center was advised of an UNUSUAL EVENT at the DBNPS at 0654 by the utility. The incident at the utility deteriorated and by 0803 an ALERT was declared. The Executive Group had responded to the EOC by this time and were briefed on the situation. Meanwhile, the operational staff of the EOC were being activated. The Executive Group, consisting of the County Commissioners, the County Engineer and the County DSA Director, took charge of the response as a well organized body and responded professionally to the various situations which arose during the entire exercise. The manner in which this group methodically considered their method of response in a timely manner was impressive.

The operational staff which basically supports the executive staff in providing the necessary support for the various organizations they represent were in place by 1105. They displayed the ability to provide the resources required by the emergency on a continuous basis by ensuring that qualified staff members would be available around the clock. This was accomplished over all by double staffing and by presentation of a roster of personnel who could be relied upon to continue this support.

Emergency Operations Management

The Ottawa County Board of Commissioners supported by the County Engineer and the County DSA Director provided effective command and control of the emergency response procedures. Initial as well as periodic briefings were conducted to keep the executive and operational staffs aware of the important events of the emergency. Realistic emergency situations were introduced to these staffs throughout the exercise to test their ability to respond to minor emergency events which could adversely affect their overall response to the emergency. The staff responded to these varied problems effectively.

Message handling was efficiently done and facilitated the ability to keep the staff informed of the events in a timely manner.

The County contacted the Governors office and secured the support of the Ohio Army National Guard. This was accomplished at 1126 during the SITE AREA EMERGENCY classification.

Facilities

The EOC has five principal work areas. These are the Executive Group room, the Accident Assessment room, the Information and Rumor Control room, the Communications room and the Operations room. Each room is adequately lighted, supplied with the necessary furniture and telephones. Sleeping areas, showers and limited kitchen facilities are available in adjacent areas. Emergency power is available and was demonstrated during the exercise. Maps showing the plume EPZ, with sectors labeled and emergency action subareas color coded are posted in each of the principal work areas. Also available and used are maps showing evacuation routes, relocation centers, access control points, radiological monitoring points and population by evacuation areas. Status boards are hung in each of the work areas and are kept up-to-date on significant events. The emergency action classification level was posted throughout the EOC and kept current at all times.

Communications

The County demonstrated their primary and alternate means of communicating with all the organizations intended to provide support to the emergency response. These communication links proved to be effective and enabled the county to communicate with the JPIC, State and surrounding Counties, as well as those support organizations within the County. The systems utilized included dedicated telephone, commercial telephone, County and ARES radios and telefax. Conferencing capability was available on these lines. Hard copy capability was available and was generally reliable and reasonably rapid.

Dose Assessment and Protective Action Recommendations

The State of Ohio developed dose projections and provided them to Ottawa County along with any protective action recommendations. Ottawa County considered both utility and State protective action recommendations prior to making a decision concerning protective actions primarily for the plume pathway (10-mile EPZ). Ottawa County considered such factors as the reported plant status, evacuation time estimates, and weather.

Prior to and during this exercise a snow storm occurred in the exercise area that if this had been a real accident would have to have been considered. Ottawa County during this exercise did consider real weather conditions and bad weather as part of the considerations during the second protection action recommendations to shelter subareas 1 and 2, as recommended by the utility, rather than evacuate as recommended by the State of Ohio. Throughout the exercise protective action recommendations were promptly reviewed and updated as conditions changed. Protection action recommendations were coordinated with Lucas County in each instance.

At 1359 the State of Ohio made the decision to issue KI to emergency workers and to those people (institutionalized) that could not be evacuated from the affected area. This is consistent with the recent change in the State of Ohio position regarding the use of KI. State draft procedures concerning the use KI have not been finalized and have not been provided to Ottawa County. KI tablets also have not been supplied to Ottawa County. Ottawa County, in the absence of State procedures on the use of KI and a supply of KI, simulated the issuance and taking of KI tablets by Ottawa County emergency workers.

Public Alerting and Instruction

Public alerting and instruction started for Ottawa County at 1115 when the State concurred with the utility recommendation to close Lake traffic and to close State and National Parks within the 10-mile EPZ for the DBNPS. The State at that time also recommended that lactating animals within two miles of the DBNPS be placed in shelter and fed stored feed and protected water. The County contacted the EBS station with a prepared message at 1119. This message was to be broadcast frequently and was designed to provide the public with emergency instructions. Activation of the outdoor sirens and the EBS was coordinated with Lucas County. The siren system and the EBS were activated at 1126, well within the 15 minute requirement outlined in NUREG 0654/FEMA REP-1, Revision 1.

Following the GENERAL EMERGENCY, the Executive Group promptly initiated the protective action recommendations provided to them by the utility which included sheltering subareas 1 and 2, sheltering and placing lactating animals on stored feed, maintaining closure of subareas 10 and 12 with access control established in subareas 1, 2 and 10. The Executive Group utilized existing inclement weather conditions and carefully planned and considered evacuation procedures and what impediments they could potentially experience. The EBS and outdoor siren systems were activated at 1334 and again at 1358 when the State of Ohio issued additional shelter and evacuation protective action recommendations.

Protective Action

The Ottawa County EOC staff contacted the Erie County EOC to coordinate the activation of a reception center and congregate care centers in Erie County. Communications between the two EOCs was effective resulting in a coordinated response in preparing for Ottawa County evacuees.

Traffic control points were ordered activated at the time of the GENERAL EMERGENCY. The County highway staff indicated that there was enough equipment available in the area to keep the evacuation routes open during bad weather and clear stalled or wrecked vehicles. Actions were taken to assure that all roads into the controlled area were closed and that all air, water and rail traffic into the area was stopped or rerouted. Law enforcement and highway department staff indicated that there are enough local people, vehicles and other equipment to cover all traffic and access control points simultaneously.

Two traffic control points were visited. The personnel at each location had an emergency book that described the evacuation routes and the location of reception centers. They were able to communicate with their dispatcher by radio. They were both aware of the procedure for clearing impediments and the need to keep the shoulder clear for emergency vehicles.

The County Health Department staff has a current listing of mobility impaired individuals living within the risk area. They are aware of the special needs of these people. The hospital representative surveyed the hospitals for names, address etc. of recent patient discharges to supplement the prepared roster. The County fire and rescue teams would provide necessary transportation for these people. Their vehicles are equipped with two-way radio. The drivers would be provided with maps of their routes and the location of the reception centers. Crews would include a person with medical training.

There is a hospital, two nursing homes and two group homes in the risk area. Both group homes have their own vans and would provide their own transportation. Transportation for the hospital and nursing homes would be provided by County fire and rescue teams, school buses and when available the National Guard.

The County School Superintendent activated his call down list and notification procedures. School districts outside the EPZ would be dismissed early so the buses from these districts would be available for the evacuation of the risk area. The Superintendent prepared a message for transmission to the JPIC and to be included in EBS releases.

School evacuation procedures were demonstrated by the Benton-Carroll-Salem School District. This demonstration occurred the day following the exercise because schools were closed due to inclement weather on the day of the exercise. The Assistant Superintendent who is also the dispatcher received a simulated call from the County EOC. Following procedures he alerted the schools and the bus drivers. The drivers were directed to staging areas where they were provided dosimetry and additional instruction concerning their assigned schools and relocation areas.

Concurrently, the school principal took a head count. This is reported to the district office to assist in assigning buses. When the evacuation order is given (at SITE AREA EMERGENCY) the students are instructed to return to their home room, get their coats and prepare to board the buses. All teachers are evacuated with their students. The principal secures the school leaving a notice for any parent that might come to the school.

A decontamination station for emergency workers was established at the Clay-Genoa Volunteer Fire Department. The call up of personnel was simulated and there was sufficient personnel available to maintain around the clock operation of the decontamination station. The staff was proficient in their demonstration of equipment and facilities for emergency worker decontamination. The staff demonstrated prior training in the establishment of the station, registration procedures, radiological monitoring, and decontamination procedures for both personnel and equipment.

The need for decontamination was determined by interrogation and monitoring for contamination of personnel and monitoring vehicles for radiological contamination. Proper procedures were demonstrated or well explained. Necessary data was recorded and required equipment was used in the decontamination demonstration. The emergency worker's personal dosimetry was checked and properly bagged for future analysis correcting a weakness identified during the previous exercise. Contaminated clothing is placed in properly marked plastic bags for storage and disposal by the plant at a later time. Waste water used for decontaminating vehicles flows into drainage ditches near the station.

Officials at the Ottawa National Wildlife Refuge, the Crane Creek State Park and the Crane Creek Wildlife Experiment Station were interviewed during the exercise. These parks would be closed to the public during an emergency at the DBNPS. Message logs indicated that notification had been received from both the Ottawa County Sheriff and the ODSA during the ALERT classification as per the plan. The Officers-in-Charge had SOP manuals and indicated that park workers had these manuals in their radio equipped vehicles. Dosimetry equipment, chargers and TLDs were available as well as record keeping forms.

The Officers-in-Charge were knowledgeable of the necessary protective actions and had received appropriate training. Some of the park workers had also been trained and others were currently scheduled for training. Public instructions would be provided by various means including bullhorns, boats and public address systems in vehicles. The Wildlife Refuge official is responsible for notifying visitors on the wildlife trails, the State Park official for swimmers and picnickers, and the Experiment Station official for duck hunters and visitors at the wildlife museum.

Radiological Exposure Control

The County appears to have an adequate supply of mid- and high-range dosimeters, chargers and TLDs. Record keeping procedures and supplies are in place. An instruction sheet is included in each kit. Persons leaving the EOC for areas at risk were also briefed on the procedures to be followed. The workers at the traffic control points and the school bus drivers were issued kits containing the above equipment and forms.

The four emergency workers interviewed knew how to read their instruments, when and who to report to, what their maximum allowable dose is and where decontamination centers are located.

The Clay-Genoa Volunteer Fire Department also serves as a dosimetry kit distribution point. Personnel there checked each dosimetry kit prior to issuance and verbally explained the use of the dosimetry to emergency workers. Reporting and record keeping requirements were also explained.

Media Relations

No media briefings were conducted at the EOC nor were any press releases made from the EOC directly to the media. Both of these activities are routinely handled at the JPIC but can be done at the EOC before the JPIC has been activated.

Material to be released by the County PIO at the JPIC was cleared by the Executive Group before release. Hard copy of County releases and all other releases made at the JPIC were sent to the EOC for general information and for use by the rumor control staff.

The rumor control function in the EOC was staffed by County employees. They had the public information brochure, copies of all news releases made from the JPIC and access to the EOC staff to assist them in responding to questions from the public. The staff monitored radio and TV broadcasts. One telephone was available for the rumor control function. The telephone number was released at the JPIC in printed releases and during briefings.

The Ottawa County PIO at the JPIC displayed adequate training and knowledge. He participated in all six briefings. He exchanged information and coordinated releases of information with the other spokespersons at the JPIC. Primary communication was commercial telephone with secondary communications being datafax which also provided hardcopy capability between the Ottawa County EOC and the JPIC.

Public instruction to Ottawa County during the shelter protective action included guidance on sheltering methods (e.g, close windows put cloth over mouth when outside, etc.) and it also included instructions for transients without shelter. During the evacuation protective actions, instructions to the public included information on the evacuation of school children. News releases also contained information that was announced over the EBS.

Medical Support

An ambulance and crew from Mid-County EMS demonstrated their capability to handle a contaminated injured individual. The ambulance crew demonstrated a high level of training in monitoring and care of the simulated contaminated injured victim. They also demonstrated the capability to establish communications with the hospital while enroute utilizing the REMSNO radio net. The REMSNO radio net reportedly has capability for communications with local EOCs through the County Sheriff's radio net and all regional emergency response organizations (i.e., police, fire, ambulance services, emergency rescue, etc.) throughout the northern Ohio region.

In a separate medical support drill conducted on September 11, 1986, a injured contaminated patient was transported from onsite at the DBNPS, by ambulance from the Carroll Township EMS, to the Fremont Memorial Hospital in Fremont. The hospital's emergency room staff was notified of the accident involving the injured contaminated patient by telephone from utility personnel. Utility personnel advised emergency room staff of the patient's vital signs and that the patient would be enroute to the hospital by ambulance shortly thereafter.

The Carroll Township EMS ambulance crew demonstrated a high level of training in monitoring and care of the simulated contaminated injured victim. They also demonstrated the capability to establish communications with the hospital while enroute utilizing the REMSNO radio net.

The receiving area at the hospital was cordoned off by ropes and a pathway protected by herculite. The emergency room staff had all the necessary equipment for radiological monitoring and decontamination of the patient. The equipment included whole body tray with inlay stretcher, water containment barrels, water faucets with hoses, herculite tarp and plastic floor runners, dosimeters and TLDs, etc. The emergency room staff demonstrated sound procedures in handling the patient, so as to avoid spreading contamination. All radiologically contaminated items are bagged in plastic and would be turned over to the DBNPS for disposal.

Recovery and Reentry

Although recovery and reentry procedures were not an exercise objective, the Executive Group carried out a discussion relative to their desire to develop comprehensive planning procedures.

Scenario

The scenario provided Ottawa County with ample opportunity to demonstrate all of the objectives selected for demonstration during this exercise.

3. Erie County

Activation and Staffing

The Erie County EOC was activated following receipt of the SITE AREA EMERGENCY notification from Ottawa County. This call was received and verified by the Erie County Sheriff's Department. The Sheriff's Department notified the Erie County DSA Coordinator at 1125 who promptly initiated staff mobilization procedures utilizing a written call list. The EOC was staffed in approximately thirty minutes with representatives from Erie County Disaster Services Agency, Erie County Human Services, Sandusky School Superintendent, Sandusky Fire Department, Erie County Sheriff's Department, and Erie County Health Department. A liaison was also dispatched to the Ottawa County EOC.

The EOC staff were knowledgeable about their emergency responsibilities and effectively demonstrated their capability to coordinate emergency services (law enforcement, fire and rescue) and facilitate the activation and operation of the reception and congregate care centers.

Emergency Operations Management

The DSA Coordinator was the individual effectively in charge of the EOC operation. He conducted periodic briefings and involved the EOC staff in decision making. Copies of the plan, procedures and checklists were available and utilized. Message logs were kept and message handling was efficient. Access to the EOC was controlled by the Sheriff's Department.

Facilities

The EOC is temporarily housed in the basement of the Erie County Services Building. The facility had sufficient resources to adequately support the EOC staff during the exercise. The emergency classification level was posted and an up-to-date status board was maintained with significant events. Maps of the EPZ, evacuation routes, relocation centers and traffic control points were available in the EOC.

Communications

Commercial telephone was the primary means of communication between the Erie County EOC and other locations. Sheriff's Department radios provided backup communication capability to Ottawa County. ARES provided radio backup communication between the EOC and the reception and congregate care centers and the school staff also had portable radios. Fire Department radio would provide a communication link with the ambulances. Other city and County radio systems are available to support emergency communications as necessary.

Dose Assessment and Protective Action Recommendations

These activities are not applicable to Erie County.

Public Alerting and Instruction

These activities are not applicable to Erie County.

Protective Action

Erie County served as a host County for some of the Ottawa County evacuees. Once the Erie County EOC was activated, the EOC staff placed appropriate reception and congregate care center personnel on standby. Following receipt of the GENERAL EMERGENCY notification, the reception center at the Sandusky High School and the congregate care center at the Jackson Junior High School were activated. These two facilities were fully operational within one hour. The EOC staff considered the expected number of evacuees and the problems which would be encountered in maintaining the orderly flow of evacuees to the reception center especially the impact of adverse weather conditions.

The reception center was staffed by representatives of Erie County Human Services, Red Cross, Salvation Army, Sandusky High School, Sandusky Fire Department, Erie County Dog Warden, Erie County Health Department, Sandusky Police Department, Perkins Township Fire Department, and ARES. Around the clock staffing capability was evidenced by presentation of a roster of second shift personnel. The staff were knowledgeable of their emergency responsibilities and demonstrated a high level of training as they effectively performed their assignments.

Simulated evacuees were met upon arrival and guided to the monitoring station on a protected pathway. A record of each individual's monitoring was kept. If decontamination was necessary the individual was directed to the appropriate shower area, decontaminated, remonitored and provided with clothing. Appropriate resources for decontamination were available and the

estimated value of each person's contaminated clothing and possessions was recorded as the material was bagged. Individuals were then directed to the registration tables. Following registration the evacuees were transported to the congregate care center. School buses would be utilized to provide this transportation.

The congregate care facility was adequate to house the 200 evacuees as stated in the plan. The evacuees were checked for registration cards as they arrived at the center. Those without them would be directed to the reception center for radiological monitoring and registration. The facility was laid out with a nursing station, kitchen facilities, recreation area, sleeping areas, shower and toilet facilities, and separate areas for mothers with infants and people with illnesses. The staff was knowledgeable of their emergency responsibilities and demonstrated a high level of training as they effectively carried out their assignments.

Radiological Exposure Control

This activity was not applicable to Erie County.

Media Relations

This activity was not applicable to Erie County. However, the federal evaluation team has a recommendation with respect to media relations in host Counties. This recommendation is based on the fact that the information released at the JPIC would be of interest to evacuees and useful for the County in establishing rumor control.

Area Recommended For Improvement: The State of Ohio should consider establishing a hard copy data transmission capability between the JPIC or State EOC and the host Counties to facilitate the flow of information.

Recovery and Reentry

When reentry was authorized the EOC staff discussed the activities necessary for the orderly termination of the congregate care facility. Each agency was requested to review their procedures and then simulate the communication of appropriate instructions to their respective field contingents.

Scenario

The scenario was adequate for Erie County to demonstrate their reception and congregate care activities. It was noted, however, that there were significant periods of inactivity particularly in the EOC and following the field demonstrations.

Area Recommended For Improvement: The exercise controllers should provide "free play" activities during period of inactivity. Another alternative might be to terminate the participation of support agencies once their demonstrations are complete and their objectives have been met.

4. Lucas County

Activation and Staffing

A four-way dedicated telephone system is in place between the DBNPS, ODSA, Ottawa County, and Lucas County. This telephone link is continuously monitored by the Lucas County Sheriffs Department's dispatch center.

At 0700, the DBNPS informed Lucas County (over the four-way dedicated phone system) of the UNUSAL EVENT at the plant. The Lucas County Sheriff's dispatch center staff, using the telephones and pagers, informed appropriate Lucas County officials of the UNUSAL EVENT at the DBNPS.

The initial activation of the Lucas County EOC staff was initiated at 0807 when the DBNPS informed Lucas County of the ALERT condition at the plant. The Lucas County Sheriff's dispatch center staff initiated alerting procedures, using an updated, written call list to mobilize the EOC staff that were to report to the EOC at the ALERT emergency classification. The EOC was fully staffed for the ALERT level by 0930 and at 1150 for the SITE AREA EMERGENCY classification level. The organizations listed in the plan were represented in the EOC. The capability to continue operations over an extended period of time was reflected by a roster of backup (replacement staff) for the EOC first shift.

Emergency Operations Management

Access to the EOC was established early and maintained throughout the exercise. The President, Lucas County Board of Commissioners was the individual in charge of Lucas County. This is the same individual that is identified in the County plan. Periodic briefing for the EOC staff were conducted by the President of the Lucas County Board of Commissioner, the Operations Officer or the Radiological Officer for Lucas County. The utility representative provided information concerning plant status when requested. The staff were involved in decision making but did not make presentations during the briefings.

Area Recommended for Improvement: Lucas County should consider also involving the EOC staff during these periodic briefings to better inform the full EOC staff of the actions being taken by each agency.

Appropriate plans, SOP's and/or checklist were available for reference by the EOC staff. Message logs were maintained and messages were reproduced and handled in an efficient manner, although one zerox machine did malfunction during the exercise. Due to the slow activity of the scenario this did not adversely impact on the exercise play.

The Executive Group in the EOC consisted of the three members of the Lucas County Board of Commissioners, the Lucas County Sheriff, the Lucas County Disaster Services Agency Director, and a Jerusalem Township Trustee. The Mayors of the cities of Oregon and Toledo are optional members of the Executive Group but they did not participate in this exercise. One of the Lucas County Commissioners also did not participate due to a business trip out of town. The Executive Group in the EOC kept informed of the situation, coordinated their actions with the State of Ohio, Ottawa County and the DBNPS and effectively managed the Lucas County actions.

Lucas County was notified of the UNUSUAL EVENT, ALERT, SITE AREA EMERGENCY and GENERAL EMERGENCY at 0700, 0807, 1115, and 1318 respectively. They concurred with the initial protective action to close traffic on Lake Erie, to close State and National Parks and to shelter lactating animals within two miles of DBNPS.

The utility and the State recommended slightly different protective actions at 1321. The utility recommended State and local government shelter subarea 1 and 2 and to evacuate subareas 10 and 12. The State recommended subarea 1, 2, 10, and 12 be evacuated and to shelter lactating animals out to 10 miles. The Executive Group decided to adopt the recommendation of the utility. At 1342 the utility recommended evacuation of sub areas 1, 2, 3, 10, 11, and 12 due to an estimated two hour release starting at 1315. The State of Ohio at 1344 concurred with the utility recommendation but added that lactating animals be put in shelter, feed stored feed and protective water out to 10 miles from the DBNPS. The State later changed this distance to 40 miles. The Executive Group concurred with the State protective actions and took necessary actions to implement them, e.g. activating reception and congregate care centers at 1400.

Facilities

The EOC is located in the sub-basement of the Lucas County Correctional facility, 1622 Spielbush Avenue, Toledo, Ohio. This newly developed facility is spacious, well lighted and has sufficient furniture to support the EOC staff. The EOC has 42 telephones with the capability to expand to 50 telephones. These telephones function off a dual (control and centrex) system. This gives the EOC a backup system in the event one of the systems goes out of service. Backup power is available but was not demonstrated. Bunk, showers and kitchen support are also available to support the EOC staff over an extended period. Food for the EOC staff is from the Sheriff's Department kitchen and/or local purchase.

The necessary displays/maps (plume EPZ, evacuation routes, relocation, access control, radiological monitoring points, population by evacuation area) are posted in the EOC. The emergency classification level is clearly posted and changed to correspond with the changes of the emergency classification levels, the status board is clearly visible and it was kept up to date.

Communications

The following is a summary of the Lucas County communications capability:

<u>Facility</u>	<u>Primary</u>	<u>Backup</u>
State EOC	Dedicated telephone	Radio
County EOC	2-way dedicated telephone	Radio
EOC	4-way dedicated telephone	Radio
EBS Station	Telephone	Telephone
JPIC	Telephone	Datafax
Local Schools	Telephone	Radio
Hospitals	Direct line telephone	Radio
Ambulances	Dedicated telephone	Radio
Monitoring Teams	Radio	N/A

Unlimited conferencing capability was available on these lines. Backup capability is available from both ARES and EOC radio communications. Two hard copy devices were available to the media center, which were generally reliable and reasonably rapid. One device did malfunction but did not affect operations.

Dose Assessment and Protective Action Recommendations

The State of Ohio developed dose projections and provided them to Lucas County along with any protective action recommendations. As indicated earlier, Lucas County considered both utility and State protective action recommendations prior to making a decision concerning protective actions primarily for the plume pathway (10-mile EPZ). Lucas County considered such factors as the reported plant status, evacuation time estimates, and weather.

Prior to and during this exercise a snow storm occurred in the exercise area that if this had been a real accident would have to have been considered. Lucas County during this exercise did consider real weather conditions and bad weather as part of the considerations during the second protection action recommendations to shelter subareas 1 and 2, as recommended by the utility, rather than evacuate as recommended by the State of Ohio. Throughout the exercise protective action recommendations were promptly reviewed and updated as conditions changed. Protective action recommendations were coordinated with Ottawa County in each instance.

At 1359 the State of Ohio made the decision to issue KI to emergency workers and to those people (institutionalized) that could not be evacuated from the affected area. This is consistent with the recent change in the State of Ohio position regarding the use of KI. State draft procedures concerning the use KI have not been finalized and have not been provided to Lucas County. KI tablets also have not been supplied to Lucas County. Lucas County, in the absence of state procedures on the use of KI and a supply of KI, simulated the issuance and taking of KI tablets by Lucas County emergency workers.

Public Alerting and Instruction

Public alerting and instruction started for Lucas County at 1115 when the State concurred with the utility recommendation to close Lake traffic and to close State and National Parks within the 10-mile EPZ for the DBNPS. The State at that time also recommended that lactating animals within two miles of the DBNPS be placed in shelter and fed stored feed and protected water. Activation of the outdoor sirens and the EBS was coordinated with Ottawa County. The siren system and the EBS were activated at 1126, well within the 15 minute requirement outlined in NUREG 0654/FEMA REP-1, Revision 1.

The EBS and outdoor siren systems were again activated at 1334 and 1358 when the State of Ohio issued additional shelter and evacuation protective action recommendations. Ottawa County, after consultation with Lucas County, activates the EBS system. The outdoor siren system within Lucas County can be activated by either Lucas County or Ottawa County. During this exercise Lucas County simulated the activation of the siren system rather than have Ottawa County simulate this. The actual sounding of the siren system and the EBS system was not required for this exercise.

Prescribed messages were used by Lucas County for use by EBS and the Lucas County spokesperson at the JPIC. The protective action areas were described in terms of familiar boundaries and landmarks.

Protective Action

Evacuation and access control was conducted by activation of traffic control points. Traffic volume was discussed as well as the effects of bad weather regarding evacuation routes. Access to contaminated areas were blocked and water traffic stopped. Local resources were considered to be adequate in terms of personnel and vehicles.

A traffic control point was established at the Intersection of Teachout Road and Corduroy by a deputy Sheriff. He was trained and familiar with the evacuation routes and location of the reception center and the congregate care centers. He was able to communicate with the County EOC and personnel at other traffic control points by radio. He received periodic reports and updates over the radio. The County has resources and arrangements with contractors for clearing traffic obstructions and keeping a lane clear for emergency vehicles.

A listing of 35 mobility impaired individuals has been identified with the roster maintained by the Jerusalem Township Fire Department. Transportation of these personnel is by REMSNO. Notification to the ambulance drivers is by telephone. It was estimated that there were 20 mobility impaired included in the 230 evacuees. Arrangements were made for their simulated evacuation.

The Oregon School System demonstrated the organizational ability and resources to effect an orderly evacuation of school children through a simulated evacuation of the Jerusalem Elementary School. Though not within the 10-mile EPZ, the school's evacuation is planned as a precautionary measure due to its proximity to the EPZ.

Evacuation is authorized by the Superintendent of the Oregon School System, who is very knowledgeable of his responsibilities. Evacuation of the school is by bus although parental pick-up is considered. There are 55 buses of which 32 are equipped with two-way radios. Ten buses are required for evacuation of the school and at least ten buses were operational. However, in keeping with the exercise plan, one bus was used for demonstration of procedures. The event, which normally would follow GENERAL EMERGENCY, was held mid-morning to facilitate real time use of the bus.

The bus was dispatched at 1000 from the Oregon City Schools Transportation Director's office, which has a radio base station. The bus arrived at the Jerusalem Elementary School at 1010, simulated loading of students and departed for the Eisenhower Junior High School. The driver of the evacuation bus had a copy of the evacuation route to follow, used it correctly and promptly arrived at the prescribed relocation center. The driver was experienced and knew her responsibilities. In addition to basic and follow-up annual safety training, she had attended the utility's training session for drivers of school buses used in evacuation.

Areas surrounding both schools are spacious and traffic jams are not anticipated. However, SOPs contain procedures to resolve this and police would be called if needed.

Throughout the exercise, the Superintendent of Schools used commercial telephone for communications with emergency authorities. The Oregon School System Business Manager proceeded to the Lucas County EOC prior to GENERAL EMERGENCY, where he served as liaison. Alternate communications would have been by radio.

The Oregon School System has an excellent plan and well-written SOPs which prescribe duties at all emergency action levels for the Superintendent and staff, principals, teachers, and school support staff.

Area Recommended For Improvement: The assignment of the Dosimetry Coordinator should be specifically indicated in the plan. The Schools Transportation Director is responsible, but this is not stated in the plan. Additionally, the SOPs for Jerusalem Elementary School should clearly state that homeroom teachers will accompany their students who are evacuated by bus, and that specialty teachers should report to Eisenhower Junior High School to assist in management of the evacuated students.

There are currently no mobility impaired students at Jerusalem Elementary School, but a bus is available for wheel-chair evacuees. The one blind student remains the responsibility of her homeroom teacher, who would assure her evacuation.

A reception center for evacuees was established at the Eisenhower Junior High School. Lucas County Human Services, Oregon School System, Red Cross, Oregon Township Fire Department, Salvation Army, Dog Warden, Police Department, Township Trustee, and Health Department representatives were all present at the reception center. Duties were assigned as follows: Human Services handled reception and registration of evacuee; Oregon School System handled communications with the EOC (telephone with ARES backup) and transportation of evacuees and assisted Human Services; Red Cross handled shelter openings; Oregon Township Fire Department handled contamination monitoring and decontamination of evacuees and emergency medical services; Salvation Army provided refreshments for personnel and evacuees and fresh clothing for decontaminated evacuees; the Dog Warden provided for the care of animals; the Oregon Police Department handled traffic control and security; Health Department monitored sanitation; and a Township Trustee served as a liaison for all local problems.

All personnel arrived at the school by 1234 except the Fire Department which arrived at 1300. Notifications were made from the EOC by telephone with radio as backup. The staff had been through orientation and training by ODSA, the DBNPS and the Red Cross. 24-hour staffing was shown by double staffing and roster.

Simulated evacuees arrived at the reception center at 1400. Upon arrival all evacuees are monitored for contamination. If contaminated they were sent to segregated showers. All evacuees would be decontaminated at this location and contaminated clothing bagged for disposal. After showering, the evacuees would be remonitored and provided with clothing or new paper jumpsuits to wear. Those still contaminated are registered and sent to St. Charles Hospital. Those decontaminated or not requiring decontamination are assigned to a congregate care center or a place of their own choice. School buses are used to transport evacuees to the care centers.

The Fire Department had two monitoring teams present for the exercise. Each team could monitor 20 evacuees an hour. They used a CDV-700 to monitor evacuees and were knowledgeable about their duties and the proper monitoring procedures.

A congregate care center was located more than 5 miles beyond the plume EPZ at the Clay High School. The center can accommodate 278 evacuees. They have sufficient cots and blankets, toilets, drinking water, secured storage, and parking available. The school has enough food on hand for at least two meals. The Red Cross would purchase additional foodstuffs as needed and the school cafeteria personnel would handle preparation and feeding. The shelter can handle handicapped evacuees.

The staff was able to communicate with the EOC and emergency medical facilities by telephone with radio as backup. A nurses station was established at the center. The staff was aware of how many evacuees were expected to arrive. All evacuees would have to have pink slips from the reception center to get in. If they did not have a pink slip they would be sent back to reception center for registration and monitoring.

A decontamination station for emergency workers was established at the Jerusalem Township Fire Department. The staff was proficient in their demonstration of equipment and facilities for emergency worker decontamination. Twenty five (25) radiological monitors are trained and the department has an excellent facility equipped with the required decontamination and monitoring equipment.

The need for decontamination was determined by interrogation and monitoring for contamination of personnel and monitoring vehicles for radiological contamination. Decontamination procedures were demonstrated by using two personnel and one vehicle (ambulance). CDV-700-2 meters were used to measure simulated radioactivity. Proper procedures were demonstrated or well explained. Necessary data was recorded and required equipment was used in the decontamination. Personnel are well trained. It was estimated that 12-15 personnel and 2-4 vehicles can be decontaminated per hour.

The wash water used for decontaminating personnel enters a septic tank system and contaminated clothing is placed in properly marked plastic bags for storage and disposal by the plant at a later time. The septic tank can also be pumped. Waste water used for decontaminating vehicles flows through a drain to remote "holding" ditches.

Radiological Exposure Control

The Lucas County EOC is well outside of the 10-mile EPZ of the DBNPS. Therefore it is not necessary for dosimetry equipment to be issued to Lucas County EOC staff. Dosimetry equipment, though, was issued to the Lucas County spokesperson assigned to the JPIC when he departed the EOC for the JPIC. Other Lucas County emergency workers in the field received their dosimetry equipment through one of the following field distribution points:

<u>Location</u>	<u>Survey Kits</u>	<u>Dosimetry Kits</u>
1. Jerusalem Fire Department	6	38
2. Oregon School District	8	49
3. Oregon Police	1	19
4. Lucas County Sheriffs	1	15
5. Ohio State Highway Patrol	1	4
6. Lucas County Engineer	1	7
7. Oregon Bus Drivers	N/A	3

Within the Lucas County EOC the following dosimetry equipment is available:

8. PIO	N/A	3
9. Civil Defense	5	14

According to the Lucas County Radiological Operations Officer the supply of dosimetry equipment is adequate to meet the needs of Lucas County.

Appropriate instructions are part of the dosimetry kits. Training on dosimeter equipment has been conducted. Emergency worker exposure control is maintained by the emergency worker calling his departmental Dosimeter Coordinator who maintains a written record of each emergency worker's exposure. During this exercise the Lucas County Radiological Operations Officer instructed emergency workers to report their exposure readings to their Dosimeter Coordinator each hour and that any exposures of 1, 5, or 15 rads should be reported to him by the Dosimeter Coordinator.

Area Recommended For Improvement: Each departmental Dosimeter Coordinator should provide periodic status reports to the Lucas County Radiological Operations Officer so that he can monitor emergency worker exposure levels and ensure that effective monitoring is being accomplished.

The deputy Sheriff at the traffic control point had a prepackaged exposure control kit that included a mid-range dosimeter (0-20R), a high-range dosimeter (0-200R), a permanent record dosimeter (TLD), and a log. He knew the maximum dose allowed without authorization and followed the proper procedures for reading and recording his dose. He was aware of procedures to follow for decontamination and where to go for a contamination check. He was not supplied with KI.

All members of the monitoring teams at the reception center had a mid-range dosimeter (0-20R), a high-range dosimeter (0-200R) and permanent record dosimeter (TLD). They all knew the maximum dose allowed without authorization and followed the proper procedures for reading and recording their dose.

Media Relations

No space is set aside for the media at the Lucas County EOC. The contact point for the media is the JPIC located at the DBNPS. There was a public information liaison in the Lucas County EOC to coordinate information between the EOC and the JPIC. The JPIC PIO initially reported to the Lucas County EOC and then departed the EOC at 0848 and arrived at the JPIC at 0955.

The Lucas County PIO at the JPIC displayed adequate training and knowledge. He participated in five of the six briefings. He exchanged information and coordinated releases of information with the other spokespersons at the JPIC. Primary communication was commercial telephone with secondary communications being datafax which also provided hardcopy capability between the Lucas County EOC and the JPIC.

Public instruction to Lucas County during the shelter protective action included guidance on sheltering methods (e.g, close windows put cloth over mouth when outside, etc.) and it also included instructions for transients without shelter. During the evacuation protective actions, instructions to the public included information on the evacuation of school children. News releases also contained information that was announced over the EBS.

Rumor control was established in the Lucas County EOC to coordinate rumor control information at the EOC with the JPIC. The rumor control number was announced over EBS, at the JPIC and was also included in written news releases. Six telephone calls from the public were coordinated by the rumor control staff during the exercise. Approximately 35 other actions were taken by the rumor control staff in the Lucas County EOC to coordinate information.

Medical Support

An ambulance and crew from the Jerusalem Township Fire Department demonstrated their capability to handle a contaminated injured emergency worker. The crew has been dual trained in both fire and emergency care procedures. The ambulance crew demonstrated a high level of training in monitoring and care of the simulated contaminated injured victim. Although the injured worker was not actually transported to the hospital, the ambulance crew was aware of the appropriate hospital to handle the victim. They also demonstrated the capability to establish communications with the hospital, the Lucas County EOC and the traffic control points.

In a separate medical support demonstration an injured contaminated individual was transported from onsite at the DBNPS, by ambulance from the Mid-County Emergency Medical Services (Oak Harbor), to the St. Charles Hospital in Oregon. Utility personnel notified the hospital's emergency room staff by telephone of the accident involving the injured contaminated patient. Utility personnel advised the emergency room staff of the patient's vital signs and that the patient would be enroute to the hospital by ambulance shortly thereafter.

The emergency room staff communicated with the ambulance crew and DBNPS health physicist while the ambulance was enroute to the hospital by use of the REMSNO radio net. The REMSNO radio net reportedly has capability for communications with local EOCs throughout the northern Ohio region utilizing the County Sheriff's radio net and all regional emergency response organizations (i.e., police, fire, ambulance services, emergency rescue, etc.) Communications with congregate care facilities and radiological laboratories (e.g. Radiation Management Corporation) is by commercial telephone.

The emergency room staff had all the necessary equipment for radiological monitoring and decontamination of the patient. The equipment included whole body tray with inlay stretcher, water containment barrels, water faucets with hoses, herculite tarp and plastic floor runners, dosimeters and TLDs, etc. The emergency room staff demonstrated sound procedures in handling the patient, so as to avoid spreading contamination. According to the hospital's emergency room staff the Radiation Management Corporation is the Utility's contractor for radiological laboratory analysis in support of emergency operations. All radiologically contaminated items are bagged in plastic (as demonstrated) and would be turned over to the DBNPS for disposal.

Recovery and Reentry

This was not an objective for this exercise.

Scenario

Implementation of this approved scenario resulted in an exercise where there were significant periods of time when the Lucas County EOC had very few demands placed upon them prior to the GENERAL EMERGENCY and after protective actions were taken for the GENERAL EMERGENCY.

Area Recommended For Improvement: It is recommended that either the scenario be designed to keep the EOC staff busy or controller messages should be inserted to drive actions by the EOC staff during periods when their is very little to be done. Another alternative might be to terminate the participation of support agencies in the field once their demonstrations are complete and their objectives have been met.

SUMMARY LISTING OF EXERCISE WEAKNESSES

UTILITY: Davis Besse Nuclear Power Station
March 31, 1987

Deficiencies

<u>NUREG</u> <u>Item</u>	<u>Narrative Statement</u> <u>of Deficiency</u>	<u>Corrective Action</u> <u>Proposed</u>	<u>Scheduled</u> <u>Date</u>	<u>Actual</u> <u>Date</u>
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There were no deficiencies identified
for the State of Ohio, Ottawa
County, Erie County or Lucas County.

UTILITY: Davis Besse Nuclear Power Station
March 31, 1987

Areas Requiring Corrective Action

<u>NUREG</u> <u>Item</u>	<u>Narrative Statement</u> <u>of Weakness</u>	<u>Corrective Action</u> <u>Proposed</u>	<u>Scheduled</u> <u>Date</u>	<u>Actual</u> <u>Date</u>
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State of Ohio

H.12	The procedures for the transport of field monitoring samples should be reviewed with personnel of the Ohio National Guard to ensure that all crew members are fully aware of their radiological emergency responsibilities.			
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J.10.e & J.10.f	The State of Ohio should finalize its draft KI policy and demonstrate its implementation during their next full participation radiological emergency preparedness exercise.			
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Ottawa, Erie and Lucas Counties

There were no areas requiring corrective action identified for Ottawa County, Erie County or Lucas County.

UTILITY: Davis Besse Nuclear Power Station
March 31, 1987

Areas Recommended For Improvement

State of Ohio

1. The State of Ohio should review its radiological monitoring training and procedures to determine if they should be revised to reduce the potential for contamination of equipment. For example, an air sampler taking a smaller sample and running off the van battery might reduce potential contamination problems, sample containers might be left in the van until needed, team members could work in unison to keep containers off the ground while collecting samples, and all staff should be fully aware of the need to limit contamination of their vehicle.
2. The field monitoring SOPs should be updated to incorporate the recent modification to the operating procedures of the multi-purpose survey instrument.
3. The milk sampling team should be provided with a two-way radio to facilitate communications in the event quick communication from or to the State or Counties is necessary.
4. The alternate JPIC location at the Toledo Edison corporate office in downtown Toledo should be demonstrated during a future radiological emergency preparedness joint exercise.

Ottawa County

There were no areas recommended for improvement in Ottawa County.

Erie County

1. The State of Ohio should consider establishing a hard copy data transmission capability between the JPIC or State EOC and the host Counties to facilitate the flow of information.
2. The exercise controllers should provide "free play" activities during period of inactivity. Another alternative might be to terminate the participation of support agencies once their demonstrations are complete and their objectives have been met.

UTILITY: Davis Besse Nuclear Power Station
March 31, 1987

Areas Recommended For Improvement

Lucas County

1. Lucas County should consider also involving the EOC staff during these periodic briefings to better inform the full EOC staff of the actions being taken by each agency.
2. The assignment of the Dosimetry Coordinator should be specifically indicated in the plan. The Schools Transportation Director is responsible, but this is not stated in the plan. Additionally, the SOPs for Jerusalem Elementary School should clearly state that homeroom teachers will accompany their students who are evacuated by bus, and that specific teachers should report to Eisenhower Junior High School to assist in management of the evacuated students.
3. Each departmental Dosimeter Coordinator should provide periodic status reports to the Lucas County Radiological Operations Officer so that he can monitor emergency worker exposure levels and ensure that effective monitoring is being accomplished.
4. It is recommended that either the scenario be designed to keep the EOC staff busy or controller messages should be inserted to drive actions by the EOC staff during periods when there is very little to be done. Another alternative might be to terminate the participation of support agencies in the field once their demonstrations are complete and their objectives have been met.

ATTACHMENTS

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2825 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085-2712

DISASTER SERVICES AGENCY

AGOH-DS

January 13, 1987

Mr. Wallace Weaver, Chairman
Regional Assistance Committee
Federal Emergency Management Agency
Region V
300 South Wacker Drive
Chicago, IL 60606

Dear Mr. Weaver:

In accordance with the January 15, 1987, milestone, enclosed are the State of Ohio, Ottawa County and Lucas County objectives for the March 31, 1987, exercise at the Davis-Besse Nuclear Power Station.

If you wish to discuss these objectives with representatives from Ohio, Lucas and Ottawa Counties, and the Toledo Edison Company, please contact Mr. Larry Grove as soon as possible to arrange for a meeting.

FOR THE DIRECTOR


RICHARD M. LOCKHART
Deputy Director

LAG:KJS/kjs

cc: Mr. James Greer, Ottawa County Emergency Management Agency
Mr. Donald Hickey, Toledo-Lucas County Disaster Services Agency
Mr. Brad Demaison, Toledo Edison Company

DAVIS-BESSE NUCLEAR POWER STATION EXERCISE

MARCH 31, 1987

STATE OF OHIO

GROUP A - CORE OBJECTIVES

1. Demonstrate ability to mobilize and activate facilities promptly.

LIMITING CONDITIONS:

The following activities will be demonstrated: JPIC Spokesperson, Field Monitoring, Communications Van, County Emergency Operations Center (EOC) Liaison and Emergency Operations Facility (EOF) Liaison. Dose Assessment, Public Information Rumor Control and Communications will be the only activities demonstrated at the State EOC. No activity will be prepositioned.

2. Demonstrate ability to make decisions and to coordinate emergency activities.

LIMITING CONDITIONS:

The State EOC will not be fully activated.

3. Demonstrate adequacy of facilities and displays to support emergency operations.

LIMITING CONDITIONS:

None.

4. Demonstrate ability to communicate with all appropriate locations, organizations and field personnel.

LIMITING CONDITIONS:

None.

5. Demonstrate ability to project field data and to determine appropriate protective measures, based on PAG's, available shelter, evacuation time estimates and all other appropriate factors.

LIMITING CONDITIONS:

None.

6. Demonstrate ability to implement protective actions for plume pathway hazards.

LIMITING CONDITIONS:

None.

7. Demonstrate ability to alert the public within the 10-mile EPZ and disseminate an initial instructional message within 15 minutes.

LIMITING CONDITIONS:

Actual alerting is a County function.

8. Demonstrate ability to formulate and distribute appropriate instructions to the public in a timely fashion.

LIMITING CONDITIONS:

Actual distribution is a County function.

9. Demonstrate the organizational ability and resources necessary to deal with impediments to evacuation, including weather or traffic obstructions.

LIMITING CONDITIONS:

At the County EOC only; Ohio Department of Transportation, Ohio State Highway Patrol and Ohio National Guard will not be at the State EOC.

10. Demonstrate ability to continuously monitor and control emergency worker exposure.

LIMITING CONDITIONS:

None.

11. Demonstrate ability to brief the media in a clear, accurate and timely manner.

LIMITING CONDITIONS:

None.

12. Demonstrate ability to provide advance coordination of information released.

LIMITING CONDITIONS:

None.

13. Demonstrate the ability to make the decision, based on predetermined criteria, to supply and administer KI to emergency workers.

LIMITING CONDITIONS:

The State does not issue KI to the general public. The ability to supply and administer KI to the institutionalized will be organizationally demonstrated, if procedures are completed.

GROUP B - OTHER OBJECTIVES

14. Demonstrate the ability to make the decision, based on predetermined criteria, whether to issue KI to the general population, and supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

The State does not issue KI to the general public. The ability to supply and administer KI to the institutionalized will be organizationally demonstrated, if procedures are completed.

15. Demonstrate the ability to supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

The State does not issue KI to the general public. The ability to supply and administer KI to the institutionalized will be organizationally demonstrated, if procedures are completed.

16. Demonstrate ability to establish and operate rumor control in a coordinated fashion.

LIMITED CONDITIONS:

None.

17. Demonstrate ability to fully staff facilities and maintain staffing around the clock.

LIMITING CONDITIONS:

All activities will present a roster.

18. Demonstrate ability to mobilize and deploy field monitoring teams in a timely fashion.

LIMITING CONDITIONS:

None.

19. Demonstrate appropriate equipment and procedures for determining ambient radiation levels.

LIMITING CONDITIONS:

None.

20. Demonstrate appropriate equipment and procedures for the measurement of airborne radioiodine concentrations as low as 10^{-7} uCi/cc in the presence of noble gases.

LIMITING CONDITIONS:

None.

21. Demonstrate appropriate equipment and procedures for collection and transport of samples of soil, vegetation, snow, water and milk.

LIMITING CONDITIONS:

One sample will be flown back to Columbus; the sample will not be read at the State lab.

22. Demonstrate appropriate lab operation functions for measuring and analyzing all types of samples.

LIMITING CONDITIONS:

Will not be demonstrated.

23. Demonstrate ability to project dosage to the public via ingestion pathway exposure, based on plant and field data, and to determine appropriate protective measures, based on PAG's and other relevant factors.

LIMITING CONDITIONS:

Samples will be simulated; lab is not participating.

24. Demonstrate ability to implement protective actions for ingestion pathway hazards.

LIMITING CONDITIONS:

Organizational only.

25. Demonstrate the organizational ability and resources necessary to control access to an evacuated area.

LIMITING CONDITIONS:

As stated in County objectives.

26. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation within the plume EPZ of these groups: transit-dependent, special needs and institutionalized.

LIMITING CONDITIONS:

As stated in County objectives.

27. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation of schools within the plume EPZ.

LIMITING CONDITIONS:

As stated in County objectives.

28. Demonstrate adequacy of procedures for the registration and radiological monitoring of evacuees.

LIMITING CONDITIONS:

County function.

29. Demonstrate adequacy of facilities for mass care of evacuees.

LIMITING CONDITIONS:

County function.

30. Demonstrate adequate equipment and procedures for decontamination of emergency workers, equipment and vehicles.

LIMITING CONDITIONS:

Demonstrated at County level only.

31. Demonstrate adequacy of ambulance facilities and procedures for handling contaminated, injured and exposed individuals.

LIMITING CONDITIONS:

As stated in County objectives.

32. Demonstrate adequacy of hospital facilities and procedures for handling contaminated, injured and exposed individuals.

LIMITING CONDITIONS:

As stated in County objectives.

33. Demonstrate ability to identify need for, request, and obtain federal assistance.

LIMITING CONDITIONS:

None.

34. Demonstrate ability to estimate total population exposure.

LIMITING CONDITIONS:

Will not be demonstrated.

35. Demonstrate ability to determine and implement appropriate measures for controlled recovery and reentry.

LIMITING CONDITIONS:

Will not be demonstrated.

Ottawa County Emergency Management Agency

Ottawa County Court House

315 Madison St. Annex Basement
Port Clinton, Ohio 43452

1987 JAN - 5 11:10 AM

JAMES P. GREER
Director/Coordinator

Doc. Harbo
Gen'l
Empire
Teleco

419 734 4411
808 7771
855 6134
860 2232
849 5097

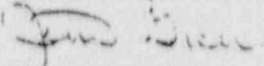
January 2, 1986

Mr. Richard M. Lockhart
Deputy Director
Ohio Disaster Services Agency
2825 W. Granville Road
Worthington, Ohio 43085

Dear Mr. Lockhart:

I am hereby forwarding the Ottawa County Objectives for the
March 31, 1986 Davis-Besse Exercise.

Sincerely,


James P. Greer

mas

DAVIS-BESSE NUCLEAR POWER STATION EXERCISE

MARCH 31, 1987

OTTAWA COUNTY

GROUP A - CORE OBJECTIVES

1. Demonstrate ability to mobilize and activate facilities promptly.

LIMITING CONDITIONS:

Certain field activities may be demonstrated out of sequence depending on the scenario.

2. Demonstrate ability to make decisions and to coordinate emergency activities.

LIMITING CONDITIONS:

None.

3. Demonstrate adequacy of facilities and displays to support emergency operations.

LIMITING CONDITIONS:

None.

4. Demonstrate ability to communicate with all appropriate locations, organizations and field personnel.

LIMITING CONDITIONS:

None.

5. Demonstrate ability to project field data and to determine appropriate protective measures, based on PAG's, available shelter, evacuation time estimates and all other appropriate factors.

LIMITING CONDITIONS:

The ability to project dosage to the public via plume exposure, based on plant and field data is not a County function, and will not be demonstrated. The determination of appropriate protective measures, based on PAG's, available shelter, evacuation time estimates, and all other appropriate factors, will be demonstrated.

6. Demonstrate ability to implement protective actions for plume pathway hazards.

LIMITING CONDITIONS:

None.

7. Demonstrate ability to alert the public within the 10-mile EPZ and disseminate an initial instructional message within 15 minutes.

LIMITING CONDITIONS:

Sirens will not be activated. Initial instructional message will not be broadcast to the public. Alerting capabilities will be demonstrated procedurally.

8. Demonstrate ability to formulate and distribute appropriate instructions to the public in a timely fashion.

LIMITING CONDITIONS:

Instructions will not be broadcast to the public, however, capabilities will be demonstrated procedurally.

9. Demonstrate the organizational ability and resources necessary to deal with impediments to evacuation, including weather or traffic obstructions.

LIMITING CONDITIONS:

Capability will be demonstrated procedurally and through message free play. No impediments will be "staged."

10. Demonstrate ability to continuously monitor and control emergency worker exposure.

LIMITING CONDITIONS:

None.

11. Demonstrate ability to brief the media in a clear, accurate and timely manner.

LIMITING CONDITIONS:

None.

12. Demonstrate ability to provide advance coordination of information released.

LIMITING CONDITIONS:

None.

13. Demonstrate the ability to make the decision, based on predetermined criteria, to supply and administer KI to emergency workers.

LIMITING CONDITIONS:

Capability will be demonstrated dependant on formulation of guidance by Ohio Department of Health.

GROUP B - OTHER OBJECTIVES

14. Demonstrate the ability to make the decision, based on predetermined criteria, whether to issue KI to the general population, and supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

Capability will be demonstrated procedurally where applicable. Based on Ohio Department of Health guidance, KI will not be administered to the general public.

15. Demonstrate the ability to supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

Capability will be demonstrated procedurally where applicable. Based on Ohio Department of Health guidance, KI will not be administered to the general public.

16. Demonstrate ability to establish and operate rumor control in a coordinated fashion.

LIMITED CONDITIONS:

None.

17. Demonstrate ability to fully staff facilities and maintain staffing around the clock.

LIMITING CONDITIONS:

Continuous staffing will be demonstrated by double staffing in some instances. Rosters may be used in some situations particularly in areas relying on volunteers.

18. Demonstrate ability to mobilize and deploy field monitoring teams in a timely fashion.

LIMITING CONDITIONS:

N/A.

19. Demonstrate appropriate equipment and procedures for determining ambient radiation levels.

LIMITING CONDITIONS:

N/A.

20. Demonstrate appropriate equipment and procedures for the measurement of airborne radioiodine concentrations as low as 10^{-7} uCi/cc in the presence of noble gases.

LIMITING CONDITIONS:

N/A.

21. Demonstrate appropriate equipment and procedures for collection and transport of samples of soil, vegetation, snow, water and milk.

LIMITING CONDITIONS:

N/A.

22. Demonstrate appropriate lab operation functions for measuring and analyzing all types of samples.

LIMITING CONDITIONS:

N/A.

23. Demonstrate ability to project dosage to the public via ingestion pathway exposure, based on plant and field data, and to determine appropriate protective measures, based on PAG's and other relevant factors.

LIMITING CONDITIONS:

N/A.

24. Demonstrate ability to implement protective actions for ingestion pathway hazards.

LIMITING CONDITIONS:

N/A.

25. Demonstrate the organizational ability and resources necessary to control access to an evacuated area.

LIMITING CONDITIONS:

Four access control points will be activated for evaluation; one each by the Ohio State Highway Patrol, Ohio Department of Transportation, Ottawa County Sheriff's Office and Ottawa County Engineer's Office.

26. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation within the plume EPZ of these groups: transit-dependent, special needs and institutionalized.

LIMITING CONDITIONS:

Capabilities will be demonstrated procedurally at the EOC. Administrators of special facilities will be available for interview by evaluators.

27. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation of schools within the plume EPZ.

LIMITING CONDITIONS:

Capabilities will be demonstrated procedurally. Students will not be transported. School Superintendents, the Benton-Carroll-Salem Transportation Supervisor, the Principal, Teachers, and staff of Carroll Elementary School will be available for interviewing by evaluators. Bus driver mobilization will be demonstrated procedurally, however, one driver will be activated and told to report.

28. Demonstrate adequacy of procedures for the registration and radiological monitoring of evacuees.

LIMITING CONDITIONS:

May be out of sequence and will be demonstrating Erie County Reception Center.

29. Demonstrate adequacy of facilities for mass care of evacuees.

LIMITING CONDITIONS:

Care centers will not be stocked with food, bedding or other normal necessities for mass care of evacuees. Care center capabilities to provide supplies will be demonstrated procedurally.

30. Demonstrate adequacy of equipment and facilities for emergency worker decontamination.

LIMITING CONDITIONS:

Capability will be demonstrated out of sequence at one decontamination facility. Some portions of procedures may be by-passed.

31. Demonstrate adequacy of ambulance facilities and procedures for handling contaminated, injured and exposed individuals.

LIMITING CONDITIONS:

None.

32. Demonstrate adequacy of hospital facilities and procedures for handling contaminated, injured and exposed individuals.

LIMITING CONDITIONS:

None.

33. Demonstrate ability to identify need for, request, and obtain federal assistance.

LIMITING CONDITIONS:

N/A.

34. Demonstrate ability to estimate total population exposure.

LIMITING CONDITIONS:

N/A.

35. Demonstrate ability to determine and implement appropriate measures for controlled recovery and reentry.

LIMITING CONDITIONS:

Will not be demonstrated.



TOLEDO-LUCAS COUNTY CIVIL DEFENSE/DISASTER SERVICES

Donald T. Hickey
DIRECTOR

1622 SPIELBUSCH
TOLEDO, OHIO 43624

AREA CDDP 419
245-4034
245-4935

January 12, 1967

State of Ohio
Disaster Service Agency

Attention: Richard M. Lockhart

Dear Mr. Lockhart:

Enclosed please find our core and optional objectives for participation in table top exercise for Maron II, and the coordinated exercise with utility, other counties and state agencies scheduled for March 31, as per functions outlined in our Radiological Emergency Response Plan.

Your support and cooperation is greatly appreciated.

Sincerely,

William S. Halsey
William Halsey
Operations Officer

WSH:bcp

cc: State
Ottawa County
TEC, Mitch

DAVIS-BESSE NUCLEAR POWER STATION EXERCISE

MARCH 31, 1987

LUCAS COUNTY

GROUP A - CORE OBJECTIVES

1. Demonstrate ability to mobilize and activate facilities promptly.

LIMITING CONDITIONS:

The County EOC will demonstrate the ability to activate all facilities. However, the actual numbers of response personnel mobilized at facilities outside the EOC will be limited to those required to fulfill primary responsibilities.

2. Demonstrate ability to make decisions and to coordinate emergency activities.

LIMITING CONDITIONS:

None.

3. Demonstrate adequacy of facilities and displays to support emergency operations.

LIMITING CONDITIONS:

The emergency power generator, located within the facility, is routinely tested. It will not be operated during this exercise.

4. Demonstrate ability to communicate with all appropriate locations, organizations and field personnel.

LIMITING CONDITIONS:

None.

5. Demonstrate ability to project field data and to determine appropriate protective measures, based on PAG's, available shelter, evacuation time estimates and all other appropriate factors.

LIMITING CONDITIONS:

This is a State function; however, the County EOC will review State and utility PAG's and make decisions based on local conditions and other constraints.

6. Demonstrate ability to implement protective actions for plume pathway hazards.

LIMITING CONDITIONS:

Organizational ability only.

7. Demonstrate ability to alert the public within the 10-mile EPZ and disseminate an initial instructional message within 15 minutes.

LIMITING CONDITIONS:

- a. The EBS warning system and the NOAA system will be a simulated event. All procedures will be followed in accordance with the scenario, but no actual broadcast to public will be transmitted.
 - b. Activation of the Emergency Warning (siren) System will be a simulated event.
8. Demonstrate ability to formulate and distribute appropriate instructions to the public in a timely fashion.

LIMITING CONDITIONS:

EBS updates will be a simulated activity, done in coordination with Ottawa County. Actual broadcast or transmission to the public will not be made.

9. Demonstrate the organizational ability and resources necessary to deal with impediments to evacuation, including weather or traffic obstructions.

LIMITING CONDITIONS:

Any response to simulated impediments will be simulated. Any resources required for removal of impediments will be demonstrated as an organizational capability without committing the resources.

10. Demonstrate ability to continuously monitor and control emergency worker exposure.

LIMITING CONDITIONS:

The actual number of emergency workers mobilized at facilities outside the EOC will be limited to those necessary to demonstrate required activities. The dosimetry will be issued from pre-positioned kits located at emergency facilities. The Radiological Officer at the EOC will monitor and control exposures through the Dosimetry Coordinators.

11. Demonstrate ability to brief the media in a clear, accurate and timely manner.

LIMITING CONDITIONS:

None.

12. Demonstrate ability to provide advance coordination of information released.

LIMITING CONDITIONS:

None.

13. Demonstrate the ability to make the decision, based on predetermined criteria, to supply and administer KI to emergency workers.

LIMITING CONDITIONS:

Availability of KI will depend on State of Ohio making KI available to local governments. KI will not actually be administered. Ability to make decision from EOC will be shown.

GROUP B - OTHER OBJECTIVES

14. Demonstrate the ability to make the decision, based on predetermined criteria, whether to issue KI to the general population, and supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

N/A.

15. Demonstrate the ability to supply and administer KI, once the decision has been made to do so.

LIMITING CONDITIONS:

Operational ability only will be demonstrated in administering KI to emergency workers.

16. Demonstrate ability to establish and operate rumor control in a coordinated fashion.

LIMITED CONDITIONS:

None.

17. Demonstrate ability to fully staff facilities and maintain staffing around the clock.

LIMITING CONDITIONS:

Around the clock staffing will be demonstrated by "roster" only for all facilities and organizations.

18. Demonstrate ability to mobilize and deploy field monitoring teams in a timely fashion.

LIMITING CONDITIONS:

Not a County function.

19. Demonstrate appropriate equipment and procedures for determining ambient radiation levels.

LIMITING CONDITIONS:

Not a County function.

20. Demonstrate appropriate equipment and procedures for the measurement of airborne radioiodine concentrations as low as 10^{-7} uCi/cc in the presence of noble gases.

LIMITING CONDITIONS:

Not a County function.

21. Demonstrate appropriate equipment and procedures for collection and transport of samples of soil, vegetation, snow, water and milk.

LIMITING CONDITIONS:

Not a County function.

22. Demonstrate appropriate lab operation functions for measuring and analyzing all types of samples.

LIMITING CONDITIONS:

Not a County function.

23. Demonstrate ability to project dosage to the public via ingestion pathway exposure, based on plant and field data, and to determine appropriate protective measures, based on PAG's and other relevant factors.

LIMITING CONDITIONS:

Not a County function.

24. Demonstrate ability to implement protective actions for ingestion pathway hazards.

LIMITING CONDITIONS:

Not a County function.

25. Demonstrate the organizational ability and resources necessary to control access to an evacuated area.

LIMITING CONDITIONS:

Only one traffic control/access control point will be manned. There will be a "window" between 9:00 a.m. and 11:00 a.m. where a person will be on call for this position. Once dispatched to traffic control/access control point, this person will be available for approximately two hours at point, unless relieved of duty earlier. Roads will not be blocked, traffic will not be denied use of roadways and access to area will not be denied to public.

26. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation within the plume EPZ of these groups: transit-dependent, special needs and institutionalized.

LIMITING CONDITIONS:

Organizational ability only. Persons in above groups will not be evacuated.

27. Demonstrate the organizational ability and resources necessary to effect an orderly evacuation of schools within the plume EPZ.

LIMITING CONDITIONS:

No school children will be evacuated from Jerusalem Elementary School nor participate in the exercise.

One school bus will participate in the exercise and simulate evacuating students only. This simulation will be done out of sequence of the scenario. The bus will be at Jerusalem Elementary School at approximately 10:00 a.m.

28. Demonstrate adequacy of procedures for the registration and radiological monitoring of evacuees.

LIMITING CONDITIONS:

Very limited number of evacuee volunteers will participate in registration and monitoring demonstration. Showering and other decontamination measures will be simulated only.

35. Demonstrate ability to determine and implement appropriate measures for controlled recovery and reentry.

LIMITING CONDITIONS:

Will not be demonstrated.

DAVIS-BESSE NUCLEAR POWER STATION (DBNPS)

1987 EMERGENCY PREPAREDNESS EXERCISE

NARRATIVE - OFFSITE SCHEDULE OF EVENTS

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
0635	A plant worker is contaminated and injured		
0700	DBNPS declares a "Notification of Unusual Event" because an ambulance must be called to transport the injured worker offsite. DBNPS notifies ODSA, Ottawa, and Lucas Counties.	ODSA receives notification declaration, verifies notification and contacts Ottawa County RRA.	Ottawa County Sheriff's Dispatch office and Lucas County Sheriff's Dispatch Office receive notification of the declaration, verify notification and contact selected officials (to include county EMA/CD directors) per procedures. Carroll Township EMS is called to transport victim.
0710		ODSA informs key personnel per procedures.	
0720		As members arrive at EOC, ODSA Radiological Emergency Teams determine availability of vehicles and pre-check field monitoring equipment.	Carroll Township EMS arrives at DBNPS to transport victim.
0730			Ambulance from Carroll Township EMS departs DBNPS to take victim to H.G. McGruder Memorial Hospital.

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
0745			Ambulance arrives H.G. McGruder Memorial Hospital.
0745	DBNPS declares an "Alert" because a resin spill in the valve reach rod room has caused radiation levels to greatly increase. The Technical Support Center, Operations Support Center and Emergency Communications Center are activated. Counties and Ohio DSA are notified of classification and 4-way dedicated phone link established.	ODSA receives notification of declaration, verifies notification and establishes state link in 4-way dedicated line. ODSA partially activates State EOC in Columbus. ODSA notifies appropriate officials and agencies per procedures.	Counties receive notification of declaration, verify notification and inform County EMA/CD Directors and selected officials per procedures. Counties partially activate EOC per procedures. State Resident Analyst and/or County RO's establish county links in 4-way dedicated line. Appropriate agencies are placed on "Standby".
0755		Ohio Dept. of Health (ODH) and Ohio EPA dispatch personnel to State EOC for State Assessment Team (chaired by ODH). Until arrival of other State Assessment Team members, Ohio DSA monitors 4-way link.	County Health Dept. and District EPA informed of situation and dispatched to Ottawa County EOC for County Assessment Group. Ottawa County Assessment Group members monitor 4-way link, Lucas County RO monitors 4-way link. Counties and State/Federal personnel determine if parks and/or Lake sub-areas should be evacuated as a precaution.

APPROXIMATE
TIME

DBNPS KEY EVENTS AND ACTIONS

OHIO RESPONSE

COUNTY RESPONSE

0815

ODSA dispatches by National Guard helicopter: EOF liaisons, State PIO and one assistant to JPIC and monitoring team leader to communications van site (also performs aerial plume centerline verification if appropriate).

ODSA dispatches communications van, pre-selected site at Bethel Church, corner of SR590 and Elmore Eastern Road.

ODSA dispatches three radiological monitoring teams in radio equipped vehicles to staging area at Fremont Airport.

ODSA Deputy Director ensures EOC security is in place (simulated).

ODSA Controller verifies that EOC is equipped to support operations if emergency escalates. (simulated).

ODSA and ODH dispatch personnel in vehicles to support county and JPIC operations.

Northwest District OEPA dispatches three sampling teams to staging area at Fremont Airport.

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
0830		Teams from ODH and OEPA arrive and establish functioning State Assessment Team in EOC.	
0915		State EOC liaisons, PIO's and monitoring team leader arrive in Ottawa County.	Ottawa County's EOC simulates transfer to emergency power.
0930	A second plant worker is injured and contaminated.	State notified.	Counties notified. Mid-county EMS called to transport victim.
0945			Mid-county EMS arrives to transport victim.
1010			Ambulance from Mid-county EMS departs DBNPS to take victim to St. Charles Hospital.
1030		ODSA monitoring teams & OEPA sampling teams arrive at staging area (Fremont Airport) and prepare for monitoring of areas if needed. Communications Van sets up at Bethel Church.	Ambulance arrives at St. Charles Hospital.

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
1115		State monitoring teams sent to down-wind sampling points.	County PIO's are sent to JPIC.
1125	DBNPS declares "Site Area Emergency." Information provided to State and Counties over 4-way link; EOF and JPIC activated.	<p>ODSA receives notification of declaration over 4-way link, notification begins for agencies with instructions to respond to State EOC for duration of emergency (activation of EOC is simulated).</p> <p>Communications links established between State EOC, utility EOF (State's liaison) and JPIC (State's PIO) with backup provided by Communications Van.</p> <p>Communications established with State's field monitoring teams through Communications Van.</p> <p>Governor declares "State of Emergency" and activates State EOC and National Guard (simulated). Governor dispatches representative to State EOC. On behalf of the Governor, pre-designated Ohio DSA staff member requests federal assistance from FEMA and U.S. DOE to include:</p> <ol style="list-style-type: none"> 1) Field monitoring 2) Field Sampling 	<p>Counties receive notification of declaration over 4-way link.</p> <p>Commissioners declare "State of Emergency" and request State assistance from the Governor (through Ohio DSA).</p> <p>County EOC's fully activated and responding agencies notified to provide representatives for EOC staffing.</p> <p>Appropriate EBS message is prepared and sirens are activated (simulated).</p> <p>Schools are notified of appropriate actions to take. (Demonstration at Jerusalem Elem. School will be out of seq. at 10:00 a.m.)</p> <p>American Red Cross requested to mobilize personnel in the event care centers are needed.</p>

APPROXIMATE
TIME

DBNPS KEY EVENTS AND ACTIONS

OHIO RESPONSE

COUNTY RESPONSE

1125
(Cont'd)3) Logistic support for
federal responseSchools that serve as
reception centers prepare
to receive evacuees.

Adjutant General's Dept. PIO
staff prepares State Press
briefing area in the Armory
in Worthington. Lines of
communication are
established with spokes-
person (PIO) at JPIC and
information is
coordinated prior to
release to the news media,
for duration of emergency.

Police, fire and ambulances
perform route verification
to ensure public heard
sirens and understand
message (simulated).

Managers of State and
Federal Parks will
evacuate visitors, if
evacuation has not already
been performed (simulated).

Rumor control line (toll-
free) established through
JPIC and EOC press center.

U.S. Coast Guard will
evacuate EPZ waterway
if evacuation has not
already been performed
(simulated).

State Assessment Team
recommends that all
lactating animals within
2 miles of the plant be
sheltered and placed on
stored feed.

Affected farms with
lactating animals are
notified of State
recommendation.

State PIO begins coordinating
releases of information to
media with other JPIC
representatives.

County PIO's establish
communication link from
JPIC to liaison in County
EOC's and begin clearance
and coordination of joint
releases with
Commissioners.

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
1300	<p>DBNPS declares a "General Emergency" based on a release to the environment and recommends protective actions.</p> <p>State and Counties informed over 4-way dedicated link.</p>	<p>State Assessment team receives notification of declaration and takes Utility's recommendations under advisement. Within 15 minutes, team formulates State's recommended protective actions, obtains Governor's approval and informs County Assessment Team of Governor's recommendations.</p> <p>Appropriate officials/agencies/media informed of change in status.</p>	<p>Ottawa County Assessment group informed of plant's change in status and utility's recommendation for protective actions. Group informs appropriate officials/agencies and performs projected dose calculations in conjunction with State Assessment Team.</p> <p>Lucas County RO informed of plant's change in status and Utility's recommendations and informs appropriate officials/agencies.</p>
1310	<p>Utility informed of State's recommendations for protective actions over 4-way link.</p>	<p>State transmits protective action recommendations over 4-way link.</p> <p>These recommendations should include protective actions for Western Ottawa County and Eastern Lucas County.</p> <p>A recommendation will also be made to shelter and place lactating animals within 10 miles of plant on stored feed.</p>	<p>Counties receive State's recommendations for protective actions. Executive groups from both counties confer on appropriate actions, then inform State and Utility of their decision.</p> <p>Appropriate EBS message initiated to inform public of actions to take. Sirens are sounded and EBS is notified (simulated).</p>

APPROPRIATE
TIME

DBNPS KEY EVENTS AND ACTIONS

OHIO RESPONSE

COUNTY RESPONSE

1310
(Cont'd)

Reception centers contacted and requested to activate (Sandusky High School and Eisenhower Jr. High School).

Agencies with personnel serving as decontamination teams contacted and requested to mobilize (Jerusalem Township Fire Department). (Clay - Genoa Fire Department will play out-of-sequence at 6:00 p.m.).

Police/fire/EMS conducts verification to insure 100% notification within affected area (simulated).

American Red Cross requested to designate and open care centers (Jackson Jr. High School and Clay High School).

Traffic and perimeter control points activated (4 points in Ottawa County and 1 point in Lucas County).

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
1400		<p>Radiological samples taken by one monitoring team are taken to State Staging Area for transport to Columbus (via helicopter).</p> <p>State Assessment Team makes deposition projections based on release data to determine if lactating advisory should be extended.</p>	<p>Traffic obstruction is simulated at SR2 and Howard Road. Lucas County law enforcement and county engineer simulate clearing impediment.</p> <p>Jerusalem Township Fire Department decon center has contaminated/injured person. EMS simulates transport to hospital.</p> <p>Traffic obstruction is simulated SR2 and SR19.</p> <p>Ottawa County law enforcement and county engineer simulate clearing impediment.</p>
1515	<p>Major release stops.</p> <p>DBNPS notifies State and Counties.</p>	<p>State Assessment Team evaluates total impact of release.</p> <p>Radiological monitoring continues.</p>	Notification received.
1615	Radiological monitoring confirms radiation levels in EPZ are at background.	Radiological monitoring confirms that plume has left EPZ.	Notification received.

APPROXIMATE TIME	DBNPS KEY EVENTS AND ACTIONS	OHIO RESPONSE	COUNTY RESPONSE
1630		Recovery - reentry dicussions take place at State, Counties and Utility.	
1630		Time shift is simulated - State Assessment Team evaluates simulated field sampling data to determine if additional protective actions should take place for ingestion zone.	
1700	Exercise Terminated.		



Federal Emergency Management Agency

Region V 175 West Jackson, 4th Floor, Chicago, IL 60604 (312) 431-5500

August 5, 1987

MEMORANDUM FOR: Assistant Associate Director
Office of Natural and Technological Hazards

FROM: *Robert E. Connor*
Robert E. Connor
Acting Regional Director
FEMA Region V

SUBJECT: Regional Director's Evaluation Site Specific, Off-Site
Radiological Emergency Preparedness Plans, Davis-Besse
Nuclear Power Station

Reference: FEMA-REP- 5-OH-2

FEMA Region V submits the Ohio State and the required local governments' Radiological Emergency Preparedness plans which pertain to the ten (10) and fifty (50) mile Emergency Planning Zone for the Davis-Besse Nuclear Power Station. This is in compliance with 44 CFR Part 350, FEMA Guidance Memorandum 16, and State and Local Programs and Support Associate Director's Memorandums, Procedural Policy on Radiological Emergency Preparedness, December 4, 1981 and Procedural Policy on Radiological Emergency Preparedness Plan Review Observations and Evaluations, and Interim Findings, dated August 5, 1983 as amended. The plans have been reviewed, exercised and critiqued by Region V and the Regional Assistance Committee. Comments as to the soundness of planning have been furnished the State.

A public meeting was announced and held site specific.

It is my opinion that off-site emergency preparedness planning for the Davis-Besse Nuclear Power Station provides reasonable assurance that adequate protective measures will be taken in the event of a radiological emergency. However, there are exceptions of specific elements as noted in the attached evaluation.

Documentation of the entire plan review, exercise and comment process accompanying this evaluation is noted in the attached "Content of Transmittal." Further documentation and related materials are retained by FEMA Regional V, which is the office of record for the plans.

Attachment

FEDERAL EMERGENCY AGENCY

REGION V

REGIONAL DIRECTOR'S EVALUATION

DAVIS-BESSE NUCLEAR POWER STATION

SITE SPECIFIC

OFF-SITE

RADIOLOGICAL EMERGENCY PLANNING

STATE OF OHIO

LUCAS COUNTY

OTTAWA COUNTY

I. Introduction:

A. Area Description:

The Davis-Besse Nuclear Power Station, consisting of unit 1 is a Pressurized water reactor (PWR) located in northwestern Ohio, near Oak Harbor in Ottawa County. It is approximately 25 miles east of the city of Toledo, Ohio. Davis-Besse is owned and operated by the Toledo Edison Company, Toledo, Ohio. Basic information concerning this facility is as follows.

The facility is located on 954 acres fronting Lake Erie. Approximately 582 acres of the site, consisting of diked marsh areas, are leased to the U.S. Bureau of Sport Fisheries and Wildlife, forming the Navarre unit of the Ottawa National Wildlife Refuge. The nuclear steam supply system rated output is 2772 megawatts. The turbine-generator output is 960,000 (electrical) gross with a net electrical station output of 906 megawatts.

The cooling tower is 493 feet high, 415 feet in diameter at the base, and 281 feet in diameter at the top. Approximately 30,500 cubic yards of concrete were used in its construction, and it has a flow rate of 480,000 gpm. The containment vessel is 285 feet overall in height, 233 feet above grade, 130 feet in diameter, and 1-1/2 inches steel wall enclosed in a shield building with 2-1/2 feet thick reinforced concrete walls. The reactor vessel is 14 feet inside diameter, 39 feet high, with 8-1/2 inch thick steel wall.

Site preparation started May 1, 1970. The construction permit was issued March 24, 1971. The operating license was granted April 22, 1977. The initial nuclear reaction was August 12, 1977 and first generation was August 28, 1977.

B. Emergency Planning Zone (EPZ):

Emergency planning is planned for in two predominant exposure pathways.

The area ten (10) miles in all geographic points from the plant is described as the "Plume Exposure Pathway". The principle exposure sources for this pathway are whole body external exposure to gamma radiation from the plume and from deposited material and inhalation exposure from the passing radioactive plume.

The second exposure pathway for planning is the "Ingestion Exposure Pathway." This planning is concerned about the ingestion of contaminated water or foods such as milk in all geographic points within fifty (50) miles of the Davis-Besse Nuclear Power Station. The emergency planning zones for the Davis-Besse Nuclear Power Station necessitate the need to coordinate the efforts of two countries (U.S. & Canada), two states (Ohio & Michigan), and eighteen (18) counties.

1. Governments within the ten (10) mile EPZ:

The inhalation plume exposure pathway EPZ out to ten (10) miles includes parts of Ottawa and Lucas Counties in Ohio and part of Lake Erie. The total affected permanent population within ten (10) miles of the Davis-Besse Nuclear Power Station, based on Figure J-10 of the Ottawa County plan is

21,514. Peak summer season, transient, and employees will raise the population within the ten (10) mile EPZ another 40,551 people. The ten (10) mile EPZ boundaries actually exceed ten (10) miles in some areas since the boundaries are drawn by using known political/geographical boundaries. The permanent population within five (5) miles of the Davis-Besse Nuclear Power Station is 1,933 people. Peak summer season, transient, and employees will raise the population within five (5) miles another 10,397 people.

2. Governments within the fifty (50) mile EPZ:

The ingestion pathway EPZ of fifty (50) miles includes a portion of Canada and Lake Erie, portions of four (4) counties in Michigan, all of Ottawa, Lucas, Wood, Sandusky, Erie, and Seneca counties in Ohio, and portions of Fulton, Henry, Hancock, Wyandot, Crawford, Richland, Huron, and Lorain counties in Ohio. The Ohio 1980 census indicates 1.1 million people are within the Ohio portion of the fifty (50) mile EPZ.

C. Special Demographic Circumstances for planning:

1. The site-specific area is one which has a seasonal population which is contrasted from summer to winter.
2. The Enrico Fermi Atomic Power Plant, Unit 2 is located approximately thirty (30) miles to the northwest.
3. Located on Lake Erie within the ten (10) mile EPZ of the Davis Besse Nuclear Power Plant are the Ottawa National Wildlife Refuge Complex, the Crane Creek Wildlife Experiment station, and the Crane Creek State Park.

According to the State of Ohio the Ottawa National Wildlife Refuge houses the Refuge Headquarters, Butternut Lodge with a capacity of 36 people and three cabins for use by environmental, educational, and bird watching groups. The Ottawa National Wildlife Refuge lies six (6) miles to the west of the Davis-Besse Nuclear Power Station. Discussions with the refuge management indicated the refuge is open year round. The peak season for the refuge lasts between May and October with a maximum one day total of approximately 500 visitors.

The Crane Creek Wildlife Experiment Station is located in Crane Creek State Park in Ottawa and Lucas Counties. The station lies approximately five miles to the west of the Davis-Besse Nuclear Power Station. The station attracts visitors throughout the year. The peak time for visitors is during hunting season when the station operates blinds for sportsmen. The maximum one day total for the station is 300 visitors.

The Crane Creek State Park is a 79 acre recreational facility located in Ottawa and Lucas counties approximately five (5) miles from the Davis-Besse Nuclear Power Station. Visitors come to the park primarily for picnics and swimming activities. According to

park sources the average daily attendance during the summer is between 1,500 to 2,000 people. The peak single day attendance during a Sunday in July is approximately 14,000 people. During the winter months the average daily attendance is between 200 to 300 people. The park is open from sunrise to sunset.

4. The entire city of Port Clinton, Ohio is included in the ten (10) mile EPZ planning even though only a portion of the city lies within ten (10) miles of the Davis-Besse Nuclear Power Station.
5. Camp Perry, Ohio Army National Guard, lies within ten (10) miles of the Davis-Besse Nuclear Power Station.
6. Because of the proximity to Lake Erie, streams and rivers which cause flooding, both Ottawa and Lucas County have experience in dealing with evacuation and mass care aspects common to any type of an emergency or disaster.

D. Emergency Planning Authority and Organization:

1. Principle State and Local Planning Organizations:

As the official responsible for the safety of Ohio's citizens and the protection of property, the Governor is in charge of the State's response efforts in the event of a radiological emergency. At all levels of government, public officials, elected or appointed, have an inherent legal and moral duty or responsibility to protect the lives and properties of their citizens, as well as to initiate damage recovery actions in an affected jurisdiction.

Sections 5915.01 through 5915.99 of the Ohio Revised Code (ORC) define the authority of various agencies to carry out response activities during a radiological emergency. Additional legal support is found in the Executive orders of the Governor, dated June 16, 1978; orders of the Adjutant General of Ohio; specified contractual agreements with the Federal Emergency Management Agency (FEMA); and other orders and directives as issued by the Governor or the Adjutant General. State activities in a radiological emergency involve providing support (for example, manpower, technical expertise, recommendations) but do not call for State direction of local government activities.

As stated in sections 5915.05 of the ORC, each county and municipality shall appoint a Director of Disaster Services. Additional authority is found under Title 3, 5, 7, 29, and 37 of the ORC, local ordinances, regulations, and decisions, to include county-wide agencies to participate in a disaster services program and mutual aid. Local and State government are responsible for pre-disaster planning, training, and response to an emergency as set forth in U.S. Code of Federal Regulations (CFR) Title 10, Part 50, Appendix E. When an emergency is beyond local resources for response or recovery, the county commissioners may request assistance from the Governor.

On December 23, 1986 the Ottawa County Board of Commissioners approved their plan, and passed a resolution to forward the "Ottawa County Plan For Response To Radiation Emergencies At Licensed Nuclear Facilities" to the Federal Emergency Management Agency (FEMA) for review.

The Lucas County Board of Commissioners on December 11, 1986 authorized the forwarding of the "Lucas County Radiological Emergency Response Plan for review by the Ohio Disaster Services Agency and the Federal Emergency Management Agency. The Lucas County Board of Commissioners forwarded their plan to FEMA on December 12, 1986.

2. Concept of operations:

Selected State, county, local, federal, and private/volunteer organizations, plus the utility company, are part of the overall response effort. The methods of accomplishing this is reflected below.

Direction and Control:

The Governor and the Chairman, Ottawa and Lucas County Board of Commissioners provide direction and control of off-site emergency activities for the State of Ohio and Ottawa and Lucas Counties. These officials are responsible for the protection of their citizens. The fulfillment of this responsibility is shared by cognizant State and local departments and agencies.

Notification:

Notification includes all initial actions necessary to alert local, State, Federal, and private sector response agencies to the occurrence of a nuclear power station accident. The minimum information for the primary response agencies must include an estimate of the area on or off-site which may be involved. Also the initial information should provide primary response agencies with enough information to permit assessment of the magnitude, nature and consequences of the accident to permit appropriate, timely, and skilled response.

When an accident occurs that causes, or may cause, an off-site release, the plant operators will alert the following primary response agencies which have 24-hour capability: The county sheriff or other designated authority, who, in turn, will notify local agencies and other response organizations, as identified in the Ottawa and Lucas County plans; The United States Nuclear Regulatory Commission; the Ohio Disaster Services Agency (ODSA); all other involved response organizations as identified in the utility company's emergency plan.

Upon notification of an accident involving protective actions (actual or potential off-site release), the primary response agency will take the following actions: The County Board of Commissioners or designated authority (sheriff) will alert the population in the EPZ; The ODSA will alert the Ohio Department of Health (ODH), (which in turn, contacts the USNRC) and other State departments and agencies whose resources may be required. In addition, ODSA will alert adjacent governmental entities which may be affected by the accident; ODSA will alert FEMA in accordance with provisions of the Federal Radiological Emergency Response Plan (FRERP) and other Federal agencies, as appropriate.

E. History of The Planning and Preparedness:

The state plan and Site specific plans for the Davis-Besse Nuclear Power Station were initially prepared using NUREG 0654/FEMA REP-1 INTERIM as a guide. They later were revised according to NUREG 0654-FEMA REP-1, Revision 1. State and local Site specific plans for the Beaver Valley and the Perry Nuclear Power Plants have also been developed using NUREG 0654/FEMA REP-1, Revision 1 as a guide.

The Governor of Ohio initially submitted to FEMA for approval the state and local Site-specific plan for the Beaver Valley Nuclear Power Plant on June 21, 1984, for FEMA approval according to provisions of 44 CFR Part 350.7. He again requested this approval in writing on January 23, 1986. The Beaver Valley Nuclear Power Plant Regional Director's Evaluation was forwarded to FEMA HQ with a recommendation for approval on March 16, 1987 and was approved by FEMA on June 11, 1987. Governor Celeste, as of the date of this Regional Director's Evaluation, has not requested FEMA approval of the State and local Site-specific plans for the Perry Nuclear Power Plant.

Governor Rhodes originally submitted the State and Local plans site specific to the Davis-Besse Nuclear Power Station to FEMA Region V for approval according to Federal guidance at that time on February 25, 1981. The Regional Director's Evaluation was forwarded to FEMA HQ with a recommendation for approval on March 29, 1982. Shortly after submitting the Davis-Besse Regional Director's Evaluation, FEMA Region V reconsidered the absence of a Lucas County plan and requested that FEMA Headquarters not process the Davis-Besse Regional Director's Evaluation until the Lucas County plan issue could be resolved. FEMA notified the Ohio Disaster Service's Agency (ODSA) on June 29, 1982, that further processing of the State submission for Davis-Besse was being placed on hold pending submittal of a Lucas County radiological emergency Preparedness Plan.

In October 1984, ODSA received from Toledo Edison a proposal to redefine the ten (10) mile "plume exposure pathway" zone (EPZ) around the Davis-Besse Nuclear Power Station. In addition to eliminating a portion of Lucas County affected by the ten (10) mile EPZ, the proposal also eliminated that part of the city of Port Clinton (Ottawa County) within the ten (10) mile EPZ that had been included in the original planning effort. The ODSA, on April 30, 1985 submitted this proposal to FEMA Region V and recommended it be approved.

FEMA Headquarters and Regional Staff reviewed the States Proposal and supporting documentation to redefine the ten (10) mile EPZ and determined that it was not acceptable. This was communicated by FEMA in a December 9, 1985 letter to the Ohio Disaster Service's Agency. In this letter FEMA also stated that in addition, due to (1) the continued absence of a Lucas County plan, and (2) the long period of time which has elapsed since the states original, incomplete submission in 1981; It was determined that FEMA would return the States original submission unless certain information is provided to FEMA Region V within 60 days of the December 9, 1985 FEMA letter. The information required with respect to the Davis-Besse Nuclear Power Station EPZ included the following five (5) geographical areas discussed in the EPZ proposal submitted by ODSA AND Toledo Edison Company: (1) the city of Port Clinton, (2) Ottawa County (western boundaries), (3) Lucas County, (4) Lake Erie boundary, and (5) the exclusion of Sandusky County from the ten (10) mile EPZ planning.

The ODSA on February 5, 1986 submitted additional information to FEMA Region V on the five (5) issues mentioned above. FEMA Region V reviewed the additional information provided by the State of Ohio and found acceptable the States decision to include the entire city of Port Clinton in the ten (10) mile EPZ planning and the Ottawa proposed changes to the EPZ affecting Benton and Harris Township, the resolution of the Lake Erie EPZ boundary, and the justification to exclude Sandusky County from the ten (10) mile EPZ planning. FEMA Region V did not accept the additional justification submitted by ODSA for the exclusion of a portion of Lucas County in the ten (10) mile EPZ Planning effort and recommended to FEMA HQ that a Lucas County plan still be required. These FEMA Region V recommendations were suggested by FEMA HQ in the letter of March 19, 1986 to the ODSA. FEMA HQ further required that an approved Radiological Emergency Response Plan for Lucas County be submitted to FEMA Region V within 120 days of FEMA's March 19, 1986 letter. ODSA, FEMA further required that dates for a full State exercise and a public meeting must also be agreed to within the 120 day period. An exercise and Public meeting was required to occur within calendar year 1986. A full participation exercise was originally scheduled for June, 1987.

The Governor of Ohio on March 24, 1986 issued his implementing directive for "The Ohio Plan For Response to Radiation Emergencies At Licensed Nuclear Facilities."

The Ohio Disaster Service Agency on May 12, 1986 wrote FEMA Headquarters to indicate a Lucas County plan separate from the Ottawa County plan would be developed. The ODSA also indicated the intent of State and local government to meet each and all of the requirements outlined in FEMA Headquarters March 19, 1986 letter but ODSA felt that a 120-day deadline for submission of a Lucas County plan and revision to the Ottawa County Plan, an exercise and Public meeting before the end of the 1986 calendar year placed an extreme hardship on State and local resources, finances, and Personnel. The ODSA requested the 120-day requirement be waived. The ODSA further pointed out that a full participation exercise at the Davis-Besse Nuclear Power Station was already scheduled for June, 1987 and requested the deadline for exercising the Lucas County Plan within calendar year 1986 be removed and instead, allow the exercise of the plan to take place in conjunction with the 1987 exercise with a public meeting held soon afterwards.

The issue of the 120-day deadline was also discussed at a May 20, 1986 meeting at the FEMA Region V offices with representatives from the Davis Besse Nuclear Power Station, ODSA, the NRC Region III and FEMA Region V. During this meeting it was tentatively agreed that a compromise would be made by moving the Davis-Besse exercise from June, 1987 to March 1987 and that the 120-day deadline would then change to a March, 1987 deadline. The ODSA, in its letter of May 30, 1986 wrote to FEMA Region V to reject the tentative compromise worked at the May 20th meeting and submitted issues that, in the opinion of ODSA, supported justification to change the Davis Besse exercise to a date after June, 1987.

Senior Representatives of the Davis-Besse Nuclear Power Station, the ODSA, and the NRC met with Senior FEMA Officials on June 6, 1986 to discuss further the Davis-Besse off-site planning issues and the FEMA March 10, 1986 letter to ODSA. Further discussion of the issues occurred during a June 9, 1986 telephone call between officials of the Davis-Besse Nuclear Power Station and FEMA Region V. Another conference call occurred June 30, 1986 between officials of the Davis Besse Nuclear Power Station, the ODSA and FEMA Region V. This resulted in a July 8, 1986 letter from ODSA that included a list of milestones and completion dates leading up to and including an exercise and public meeting. It was agreed by ODSA that the revised State of Ohio and Ottawa County Plan and the newly developed Lucas County plan would be submitted to FEMA Region V prior to December 30, 1986. These plans were actually submitted to FEMA Region V on December 29, 1986. It was further agreed that the Davis Besse exercise would occur on March 31, 1987 and the public meeting would take place on April 30, 1987.

The ODSA again wrote FEMA Region V on July 11, 1986 enclosing a copy of the memorandum of understanding pertaining to emergency planning signed by Lucas County Commissioners, Jerusalem Township Trustees, ODSA, and the Toledo Edison Company. It was further pointed out that a public forum to be conducted in Jerusalem Township to acquaint Trustees and residents with the Lucas County Radiological Emergency Response Plan was scheduled for July 22, 1986. The memorandum indicated the parties agreed to complete certain activities prior to the Davis-Besse Nuclear Power Station planned start-up in October, 1986 as well as to interim measures which remained in effect until the final approved Lucas County REP plan and facilities are in place. The Davis-Besse Nuclear Power Station was shut down as a result of the June 9, 1985 accident at the plant.

FEMA on July 23, 1986 wrote the NRC to indicate the agreement made concerning off-site planning for Davis-Besse and to inform the NRC that FEMA Headquarters was returning the previously submitted FEMA Regional Director's Evaluation to FEMA Region V. It was pointed out that following the completion of necessary plan modification, exercise activity and a public meeting, it was anticipated that FEMA would have sufficient information to proceed with an evaluation of Ohio's plans under 44 CFR 350. It was pointed out, however, that should the State and local governments fail to carry out its commitments within the time frames specified, FEMA would return the site specific plans to the State of Ohio in accordance with FEMA regulations.

FEMA agreed to provide the NRC with a status update following the planned utility only exercise in September, 1986 wherein the Counties of Ottawa and Lucas agreed to participate via a table top discussion which was observed by FEMA Region V. Another status report was to be provided to the NRC after the March 31, 1987 exercise. FEMA Region V was charged with monitoring progress to ensure that the milestones were successfully met in accordance to the dates listed in the July 8, 1986 ODSA letter to FEMA Region V and that the provision of the "Memorandum of Understanding" were adhered to. FEMA Region V, in its letter of September 5, 1986, informed ODSA of the above conditions decided by FEMA Headquarters.

The June 9, 1985 Davis-Besse accident involving severe problems with both the primary and auxiliary cooling systems, the January 31, 1986 earthquake near the Perry Nuclear Power Station and the April 26, 1986 Chernobyl Nuclear Power Station accident in Russia resulted in public, media, and political attention in Ohio concerning the status of planning around both the Davis-Besse Nuclear Power Station and the Perry Nuclear Power Plant. In fact, the Governor of Ohio on May 7, 1986 wrote the Chairman of the United States Nuclear Regulatory Commission to express his concern and urged the chairman to reconsider the commission's decision to deny the Atomic Safety and Licensing Appeals Board's desire for an exploratory hearing about Perry's ability to withstand an earthquake and the ability of the NRC to improve safety at Davis-Besse. The chairman, Nuclear Regulatory Commission on June 26, 1986 wrote the Governor of Ohio explaining the position of the NRC. It should be noted that the NRC on December 19, 1986 approved the restart of the DBNPS and by March 20, 1987 the DBNPS was again operating at full power.

The Governor of Ohio again wrote the chairman, Nuclear Regulatory Commission on August 15, 1986 citing the explosion and fire at the Chernobyl Nuclear Power Station on April 26, 1986, the January 31, 1986 Earthquake near the Perry Nuclear Power Plant and the June 5, 1985 accident at the Davis-Besse Nuclear Power Station as justification for reassessment of Nuclear safety around the world. The Governor further stated he withdrew his support for evacuation plans for the Davis-Besse and Perry nuclear power plants as well as his March 24, 1986, implementing directive, pending Ohio's review of evacuation plans. He further stated he expected the NRC would withhold the license for full power operations at the two plants until Ohio's review was satisfactorily completed. He appointed a team chaired by the Director of Highway Safety and including the chairman of the Public Utilities Commission of Ohio and the Adjutant General as member to conduct this review. The team, known as the Emergency Evacuation Review Team completed its work and submitted its report to the Governor in December, 1986. The Adjutant General of Ohio on April 30, 1987 submitted a copy of this report to FEMA Region V for consideration in developing this Regional Director's Evaluation. FEMA Region V also received and reviewed correspondence from the Ottawa County Board of Commissioners and the Director/Coordinator of the Ottawa County Disaster Service Agency, Professor Richard Wilson, Mallinckrodt Professor of Physics at Howard University, and Stone and Webster Engineering Corporation. Professor Wilson submitted a copy of his letter to the Governor of Ohio wherein he stated he felt the Emergency Evacuation Review Team's report was "technically foolish, and probably politically unwise to place any reliance whatever upon it." The report listed Professor Wilson as one of the experts consulted prior to its preparation. He stated in writing to FEMA Region V that he was not consulted but merely received a phone call. His letter to the Governor of Ohio disavowed his official involvement with the review team appointed by the Governor.

The Ottawa County Board of Commissioners' submittal to FEMA Region V consisted of sixteen (16) pages of material in response to the Governor's Emergency Evacuation Review Team Report that basically criticized and refuted the report. The correspondence submitted by Stone and Webster to FEMA Region V was also a copy of its February 2, 1987 letter to the Governor of Ohio.

This correspondence was written by an individual who also stated he appeared before the Emergency Evacuation Review Team as an expert witness, on behalf of Toledo Edison. This individual also stated in writing to FEMA Region V that he felt he report was "seriously flawed and should not be relied on in FEMA's current review of emergency planning of the Davis-Besse Nuclear Power Plant," FEMA Region V did not receive any correspondence, other than the report, that was submitted to support the report prepared by the Governor's Emergency Evacuation Review Team.

FEMA Region V did review and consider the Emergency Evacuation Review Team Report and the correspondence submitted to FEMA Region V that criticized the report in developing this Regional Director Evaluation. FEMA Region V is also aware of the fact that the Emergency Evacuation Review Team has conducted several public meetings in developing the report and has subsequently conducted several meetings to implement the findings of the Report.

FEMA Region V on October 3, 1986 submitted to FEMA HQ a written status report reflecting a schedule of activities accomplished for the period July 8, 1986 through the September 23, 1986 Lucas County table top demonstration as part of the Davis-Besse utility only exercise. The status report also contained a FEMA Region V analysis of activities outlined in the memorandum of understanding developed to protect Jerusalem Township citizens until the Lucas County Plan was completed. FEMA Region V concluded that the memorandum of understanding was being implemented as agreed. FEMA Headquarters submitted this status report to the NRC on October 21, 1986.

The Attorney General of Ohio on October 24, 1986 wrote the Director of the office of Nuclear Reactor Regulation, Nuclear Material Safety, and Safeguards, Inspections and Enforcement (NRC) requesting that the NRC initiate proceedings to suspend the operating license and prevent the restart of the Davis-Besse Nuclear Power Station. This request was not accepted and in fact the restart of the Davis-Besse Nuclear Power Station was approved by the NRC on December 19, 1986 and the Davis-Besse Nuclear Power Station went to full power on March 20, 1987.

The Nuclear Regulatory Commission on November 10, 1986 requested FEMA to provide a response to the issues raised by the October 20, 1986 resolution of the Ohio Association of Public School Employees as they relate to offsite emergency preparedness for the Davis-Besse Nuclear Power Station and the "Second Course of Action" in the 10 CFR 2.206 Petition of Toledo Coalition for safe Energy and Susan A Carter (Petition).

FEMA Region V prepared a response to the above NRC request and forwarded it to FEMA Headquarters on November 12, 1986. FEMA Headquarters, in turn, provided this response to the NRC by November 14, 1986. FEMA Region V concluded that "In spite of the resolution passed by OAPSE-AFSCME, Northwest Chapter, it does appear that school employees are willing to cooperate, attend meetings and participate in training related to their emergency duties (school bus drivers, food service, custodial, etc.) in the event of an emergency at the Davis-Besse Nuclear Power Station."

F. Plan Review:

The Regional Assistance Committee (RAC) for FEMA Region V has reviewed the Ohio Plan for Response to Radiation Emergencies at Licensed Nuclear Facilities, the Ottawa County plan for Response to Radiation Emergencies at Licensed Nuclear Facilities, and the Lucas County Radiological Emergency Response Plan. The latest RAC review was conducted February 24, 1987. The State and local site specific plans were prepared by state and local officials using NUREG 0654/FEMA REP-1, Revision 1 and 44CFR part 350 as a guide. The Toledo Edison Company did provide consultant help to assist State and local official in developing the plans. RAC review comments were provided to State and local officials involved in the planning for the Davis-Besse Nuclear Power Station. The State of Ohio has provided FEMA Region V with a schedule of corrective actions to correct remaining planning weaknesses and has also provided FEMA Region V with revised pages to the State and local site specific plan. The Regional assistance Committee review, the schedule of corrective actions developed by officials from the State of Ohio and Ottawa and Lucas Counties and the revised pages to the planning are incorporated into this Regional Director Evaluation for the Davis-Besse Nuclear Power Station.

G. Public Meetings:

Two public meetings have been conducted to explain the State and local site specific offsite plans for the Davis-Besse Nuclear Power Station. The first meeting was conducted at Port Clinton, Ohio on November 7, 1980 to explain the State of Ohio and Ottawa County plans. The second meeting was conducted on April 30, 1987 as a result of the development of the Lucas County Plan. The April 30, 1987 Public meeting was conducted at the Eisenhower Junior High School in Oregon, Ohio for the purpose of explaining the revised State of Ohio and Ottawa County plans and the newly developed Lucas County Plan. Both Public meetings were scheduled, announced, and conducted in accordance to requirements outlined in 44CFR Part 350. Both meetings were chaired by FEMA Region V. The notices of the meeting, attendance roster, and Transcript of the meeting are included as part of this evaluation.

H. Exercises:

The initial qualifying exercise was conducted on November 6, 1980. The exercise was full participation for all exercise participants; the State of Ohio, Ottawa County and the Davis-Besse Nuclear Power Station. No deficiencies affecting public health and safety were identified. Some areas requiring corrective action were identified and have been addressed by the State of Ohio and Ottawa County.

The second exercise was conducted on April 13-14, 1983. This was a partial participation exercise for the State of Ohio and a full participation exercise for Ottawa County and the Davis-Besse Nuclear Power Station. The Nuclear Regulatory Commission, Region III also participated as a player in this exercise to test their response planning. No deficiencies affecting public health and safety were identified. There were some areas requiring corrective action identified that have been addressed by the State of Ohio and Ottawa County.

The third exercise was conducted July 16, 1985. This was a full participation exercise for the exercise participants; the State of Ohio, Ottawa County, and the Davis-Besse Nuclear Power Station. Again, No deficiencies affecting public health and safety were identified. Some areas requiring corrective action were identified and have been addressed by the State of Ohio and Ottawa County.

The fourth exercise was conducted March 31, 1987. This exercise was a partial participation exercise for the State of Ohio and full participation exercises for Ottawa and Lucas Counties and the Davis-Besse Nuclear Power Station. No deficiencies affecting public health and safety were identified. There are some areas requiring corrective action by state and local governments. The areas of corrective action of the March 31, 1987 exercise were not a repeat of the July 16, 1985 exercise. The State of Ohio, Ottawa and Lucas County have submitted a schedule of corrective action to FEMA Region V which has been reviewed and found to be acceptable to correct the exercise weaknesses.

I. Prompt Alert and Notification System certification:

The certification test of the Prompt Alert and Notification System was held on March 21, 1985. Since the test two additional sirens have been added in the city of Port Clinton and five sirens have been added along the western and south western boundry. Although Lucas County did not have their own plan until 1986, two sirens were in place at the time of the exercise for that portion of Lucas County that is within ten (10) miles of the Davis-Besse Nuclear Power Station. Three additional sirens have been established in Jerusalem Township. The Prompt Alert and Notification System is currently awaiting approval by FEMA Headquarters.

J. Documentary Evidence Available For Examination:

1. Plans:

- a. Ohio Plan For Response to Radiation Emergencies at Licensed Nuclear Facilities
- b. Ottawa County Plan For Response to Radiation Emergencies at Licensed Nuclear Facilities

- c. Lucas County Radiological Emergency Response Plan
- d. Regional Assistance Committee Reviews of the above Plans.
- e. Official Notice, Attendance Rosters and Transcript of the Public Meeting held at the Eisenhower Junior High School, 331 North Curtice Road, Oregon, Ohio on Thursday, April 30, 1987 at 7:00 P.M.

2. Exercise Evaluations:

Scenario and evaluation report for the March 31, 1987 Davis-Besse exercise.

II. Plan Evaluation Summary:

Evaluation of the Ohio Plan for Response to Radiation Emergencies at Licensed Nuclear Facilities and the radiological emergency response plans for Lucas and Ottawa Counties has concentrated on the development of these plans, their content, and the implementation of these plans as observed during two (2) full participation Davis-Besse exercises, and two (2) partial participation exercise.

During the evaluation process, FEMA Region V and the RAC have had the opportunity to work with State and Local officials, private citizens, and the NRC in identifying and resolving weaknesses in the plans.

FEMA and the RAC have reviewed the revised State of Ohio Plan, the revised Ottawa County Plan and the newly developed Lucas County Plan. The RAC plans review concluded that there are no remaining planning deficiencies which would impede the health and safety of the population living in the Vicinity of the Davis-Besse Nuclear Power Station. The two (2) full participation and two (2) partial participation exercise evaluations of State and local ability to implement the plans demonstrated the State of Ohio, Lucas and Ottawa Counties can effectively respond to a radiological emergency resulting from an accident at the Davis-Besse Nuclear Power Station.

It is currently felt that the remaining planning and exercise inadequacies are such that once corrected would serve to improve upon the overall emergency capability. The inadequacies are being corrected and will be reflected in the next revision to the plans.

As a result of the this evaluation, the Federal Emergency Management Agency, Region V is of the opinion the revised State of Ohio and Ottawa County emergency preparedness plans and the newly developed Lucas County Plan are adequate and capable of being implemented to protect the population. It is recommend that approval of these plans be given by the Federal Emergency Management Agency.

A. Assignment of Responsibility:

The Governor of Ohio, as well as the Commissioners of Lucas and Ottawa Counties, have assumed by legislative enactment the responsibilities for emergency planning and response. The Federal and utility response is discussed in detail in the planning. The State of Ohio and Lucas and Ottawa Counties will carry out their planning procedures through the coordinated efforts of their respective emergency response staffs.

The State and County plans identify the principle organizations that are intended to be part of the overall response for the emergency planning areas. The operational roles of the response organizations as well as the concept of operations in relationship to the total effort is clearly identified in a narrative and diagram format.

The individuals who are in charge of the emergency response have been clearly identified by the plan. Provisions have been established for the 24-hour emergency response as well as 24-hour manning of the communications links.

The plans clearly indicates that the governments and support organizations are fully capable of providing a continuous 24-hour operation for a protracted period. The plans indicate by position title those individuals responsible for ensuring the continuity of resources necessary to the response.

The key organizations of emergency response each have clear and concise functional statements describing their individual responsibilities toward the total response effort. These functions are also projected on a matrix depicting primary and secondary levels of responsibility.

Sections 5915.01 through 5915.99 of the Ohio Revised Code define the authority of various State and local agencies to carry out response activities during a radiological emergency as the legal basis for authority. Both Lucas and Ottawa Counties Board of Commissioners passed resolutions, signed their plan indicating approval and signed letter forwarding their plans to the ODSA and FEMA for review.

The plans also provide information relative to the concept of operations and further recognizes the interrelationships between Federal, State, and local organizations intended to provide support during radiological emergencies. Letters of agreement have been established with those organizations intended to provide support during emergencies.

B. Onsite Emergency Operations:

These NUREG 0654/FEMA RSP-1, Revision 1 criteria items are assigned to the utility and therefore are evaluated by the U.S. Nuclear Regulatory Commission.

C. Emergency Response Support and Resources:

The Ohio Disaster Services Agency has established provisions for incorporating the Federal response support capability into its plan. The plan designated by title those individuals responsible to request Federal support. The State of Ohio has a wide variety of governmental and non-governmental organizations which can be relied upon to provide sufficient resources necessary to successfully respond to radiological emergencies.

The State and County plans are coordinated so that a joint response can be realized during an emergency. The next revision of the State plan will include letters of agreement concerning equipment at the EOF and the JPIC used by State and local officials. The State plan indicates that there will be a qualified State representative present at the utility's EOF around the clock during an emergency. The utility will also have qualified representatives at the Ottawa and Lucas County EOFs.

The plans have provisions for the receipt of samples collected at the sampling points as well as arrangements established for analysis in a laboratory. To expedite results, the Ohio Army National Guard provides helicopter support to transport the samples to the respective laboratory.

D. Emergency Classification System:

The State and County plans utilize the emergency classification system described by NUREG 0654/FEMA REP-1 Revision 1 and is consistent with the system used by the utility.

E. Notification Methods and Procedures:

The State of Ohio as well as Ottawa and Lucas Counties have coordinated their planning efforts so that the various resources from each are utilized in a coordinated manner.

Their plans describe the procedures that will be used to alert, notify and mobilize their emergency response personnel consistent with the emergency action level. Provisions have been established for the periodic release of information to the public.

Information provided by the utility is coordinated with State and County officials prior to release to the public. State and local officials provide public information through the Emergency Broadcast System (EBS) which is the administrative and physical means to notify the public within the ten (10) mile EPZ. The plans also specify the time required for notifying and providing prompt instructions to the public.

Outdoor sirens are used to notify individuals to turn on their radios and televisions for emergency public information. The certification demonstration of the prompt Alert and Notification System was May 21, 1985.

The system has been upgraded since then and the Federal Emergency Management Agency is currently reviewing monthly operability tests and should be in a position to make a decision concerning approval within the next four (4) to six (6) weeks. The plans provide prescriptive messages which are to be used to advise the public of the appropriate protective action.

F. Communication:

The State and County plans describe the primary and alternate communication links between all the emergency response organizations. In most instances, telephones are designated as the primary communication link between the various organizations with radio systems used by mobile units in field.

The State of Ohio as well as Ottawa and Lucas Counties maintain a 24-hour per day communication link with the utility and other organizations including the Federal government who are intended to provide an emergency response capability. The communication links are tested periodically to ensure their reliability.

G. Public Education and Information:

The Toledo Edison Company in cooperation with the Ottawa County Emergency Management Agency, Toledo-Lucas County Civil Defense and the Ohio Disaster Services Agency has developed a booklet entitled "Emergency Information For Ottawa and Lucas Counties". This booklet also includes a calendar to encourage most individuals to keep the material available to them in their homes. This booklet is updated annually by direct mail to residents within approximately a fifteen (15) mile radius of the Davis-Besse Nuclear Power Station. Notices of instruction-action and emergency information are posted in Public areas to ensure the transient population has access to necessary emergency information. Emergency information is also contained in local telephone directories and in prepared transient information flyers.

The plans designate a primary and alternate points of contact with the media. Arrangements have been established to ensure the timely exchange of coordinated news releases to the news media. A rumor control capability has been established for concerned people to call and receive a direct answer.

H. Emergency Facilities and Equipment:

The State of Ohio's Emergency Operations Center (EOC) is located in the basement of the Robert B. Beightler Armory, 2825 Granville Road, Worthington, Ohio. The Ottawa County EOC is located in the basement of the County Court House in Port Clinton, Ohio. The Lucas County EOC is located in the Sub-basement of the Lucas County Correction Center at 1622 Spielbush Avenue in Toledo, Ohio. These EOC's are the locations that the EOC staff report and conduct their emergency response. The plans indicate according to emergency action levels how and when the EOC will be manned and operated.

The State has accepted primary responsibility for offsite radiological monitoring in coordination with the utility. The State plan describes the manner in which the Ohio Disaster Services Agency and the Ohio Department of Health will fulfill these responsibilities.

The State Plan has established provisions for the inspection and calibration of offsite radiological monitoring equipment both at the State and County levels. The plan further identifies the mobile units and the various kits needed by the radiological monitoring teams. The State has established a central point for the collection of field samples and has arranged for airlift of these samples to the appropriate laboratory for analysis.

Ottawa and Lucas Counties radiological monitoring responsibilities are limited to monitoring radiation exposure to emergency workers, monitoring emergency workers for contamination, and coordinating and supporting the operation of reception centers in the area of monitoring evacuees and performing decontamination.

I. Accident Assessment:

The State plan describes the capability and the resources necessary to complete radiological field monitoring within the emergency planning zone (EPZ). It further outlines the methods, equipment, activation and notification means, field team composition, transportation, communications, monitoring locations and estimated deployment and arrival times to make rapid assessments of radiological hazards through liquid or gaseous release pathways.

The state plan addresses the capability to detect and measure radioiodine concentrations in the air.

The state has established the means for evaluating the measured parameters and gross radioactivity measurements, estimating integrated doses from the projected and accrued dose rates and for comparing these estimates with the protective action guides.

The state plan also provides for the arrangements to locate and track the airborne radioactive plume. Further, arrangements have been established with the U.S. Department of Energy (USDOE) to provide assistance when needed by the state to increase the capability of tracking and measuring the airborne plume.

J. Protective Responses:

The state, as well as Ottawa and Lucas Counties have predetermined evacuation routes and transportation for individuals to offsite locations where arrangements have been made to register evacuees and to provide them with food and shelter. A study has been conducted to ascertain the traffic flow rate based on seasonal conditions. Further, arrangements have been made to facilitate the evacuation process through the removal of impediments such as stalled cars, snow, ice, etc.

The State and county plans have established the capability for implementing protective measures which are consistent with the recommendations of the U.S. Environmental Protection Agency (USEPA). Planning is for both the inhalation and ingestion pathways.

The plan contains a narrative and individual map description of the evacuation routes, reception centers, congregate care facilities, and preselected radiological monitoring points. Separate maps providing the locations of these areas are provided in the plan. Maps projecting the various segments of the EPZ indicating population distribution at two, five, and ten miles from the Davis-Besse Nuclear Power Station are located in the State and County Plans and are also posted in the EOC. Confidential list have been prepared and periodically updated identifying those mobility impaired persons who may require special attention during protective action responses.

Provisions for the use of KI and the criteria for its use are outlined in the revised State and County Plans. The specified protective measures are consistent with Federal guidance. The Ohio Department of Health approved the policy on the use of Potassium Iodide (KI) on May 22, 1987. The revised State Policy on the use of KI is that emergency workers and institutionalized persons within the Plume exposure pathway whose evacuation may be infeasible or very difficult shall be advised to take KI as set forth in the State and county plans. The general population, as in the previous KI policy are not to be given KI.

The State of Ohio and County plans include a description of the State of Ohio's policy to distribute KI to emergency workers. The ODSA radiological analyst in each county is responsible to distribute KI to the dosimetry coordinator for each department. KI for State emergency workers has been pre-distributed by ODSA. The Ohio Department of Health is currently in the process of training persons at each local institution responsible for distributing KI to the institutionalized. Upon completion of training the Ohio Department of Health will pre-distribute liquid KI at each institution through the county health department.

The means of relocation, the hosting centers and their locations, projected traffic capacities and control of access to the evacuation area are provided for in the plans. The evacuation study conducted under contract, identified by season those anticipated impediments which may be experienced. This study provides time estimates for the evacuation of the people within the sectors to be evacuated. Monitoring of the evacuation process and dealing with impediments is the responsibility of the County and would be supported by the State as needed.

The State of Ohio in their plan makes provision for protective measures which include assurance that the food chain is carefully monitored. Procedures are established for the detection of contamination, estimating the dose commitment consequences of uncontrolled ingestion for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion and preservation. Maps are available for maintaining survey and monitoring data. The plans describes the manner in which evacuees will be registered and cared for at reception centers and Host-care facilities.

K. Radiological Exposure Control:

The Lucas and Ottawa county plans state that the Ohio DSA will furnish "radiological instrument kits." The county plans were not clear whether or not this "kit" also include dosimetry packets. The State of Ohio clarified this point in their May 19, 1987 schedule of corrective action which states the plan will be revised to read "...The State Resident analysis assigned to each county will supervise the distribution of these devices, Thermoluminescent Dosimetry (TLD's) and all other items in the dosimetry packets.

The State and County plans ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in a nuclear incident. The plans state "Individuals will be instructed to read their direct reading dosimetry devices at least hourly and more frequently when activities are performed in high radiation areas...Individuals will enter dosimeter identification numbers direct-reading dosimeter readings and corresponding times, and date...on dosimetry forms...."

The State and local plans state maximum allowable whole body exposure to emergency workers is 25 Rem, unless life saving is involved. In the latter case, the limit is 75 Rem. The plans do not allow any personnel exposures in excess of the above limits. These limits are consistent with USEPA authorized protective action guides (PAG's). The plans also include provisions for radiological decontamination of emergency workers, their wounds if any supplies, instruments, equipment and for waste disposal.

L. Medical and Public Health Support:

The State and County plans refer to a list of hospitals including back up hospitals which may be called upon to provide medical services to those contaminated injured personnel requiring medical attention. These hospitals that have been designated have trained staff and necessary equipment available to provide these services.

The Ottawa County plans states that the "H.B. Magruder Memorial Hospital, Port Clinton, Ohio serves as the primary care facility to receive and treat persons exposed, contaminated or injured as a result of a radiological incident at the Davis-Besse Nuclear Power Station.... Fremont Memorial Hospital and St. Charles Hospital will serve as the back-up for the primary medical facility in the treatment of contaminated injured individuals....H.B. Magruder Memorial Hospital will provide diagnostic evaluation services for individuals with an uptake of radiological materials. Toledo Edison has a letter of agreement with Radiation Management Corporation (RMC) to provide medical assistance."

The Lucas County Plan identifies St. Charles hospital as the primary local hospital as having the capability for evaluation of radiation exposure and uptake. Lucas County has a letter of agreement with St. Charles hospital and Toledo Edison has a letter of agreement with RMC to provide expert medical assistance. The Lucas County plan also has a letter of agreement with Memorial Hospital to provide back-up support to the St. Charles

Hospital. Transporting contaminated injured individuals to these medical facilities is also addressed in the plans.

M. Recovery and Reentry Planning and Post-Accident Operations:

The State and County plans describe the methods to enable reentry into the evacuated area. There are established procedures to evaluate the contaminated area and determine the extent in which protective measures will be relaxed. According to the plans, the State in coordination with the utility, is responsible for recommending to the county when the protective actions can be relaxed and reentry procedures implemented. It is also possible that the Department of Energy (DOE) and Nuclear Regulatory Commission (NRC) may also be involved in recommending relaxing the protective actions during the reentry-recovery phase.

N. Exercise and Drills:

The State and County plans establishes the periodic conduct of simulated emergencies into the format of an exercise to test the intergrated capability of emergency planning and response. These exercises may or may not be conducted in conjunction with the surrounding States and Counties (Beaver Valley) included in the same ten mile EPZ. The exercises are conducted as required by the NRC and FEMA rules and planning guidance. Further, the plan provides for the evaluation by Federal evaluators. The State, following each exercise, conducts their own critique and established methods where by the deficiencies observed are corrected.

The State and local plans stipulate drills and test of the various emergency response components as well as the critique of how effective they were. These drills and tests provide for the activation of the various response systems and procedures as well as radiological sampling.

The plans provide for the development of exercises which includes a listing of objectives, a scenario, and time sequence of events. The text of the plans describes the development of a narrative and the materials which are developed for official observers during their evaluation of the exercise. The plans also outline the procedures that will be implemented to ensure that corrective actions will be made to all planning deficiencies.

O. Radiological Emergency Response Training:

The State and County plans include procedures for the phased training of appropriate emergency response personnel. The State conducts public official conferences and per-exercise training. These training efforts usually involve State, local, and utility instructors. The State conducts this initial and refresher training for the emergency response personnel directed at their area of responsibility during emergencies. The training programs, in addition to initial training, also includes refresher and retraining programs that are scheduled annually. The training is designed to maintain emergency worker proficiency and can be requested at any time.

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

The State and County plans address the responsibility for plan development, its review, update, distribution and assurance the planners are properly trained. It further identifies the individual, by title, is responsible for the radiological emergency response planning. The State agencies have designated emergency planning coordinators who are responsible for the development and updating of plans and their coordination with other response organizations. The State and County plans provides for update and annual certification. The State and counties make plan changes as necessary and publishes those revisions each year to update the plans for annual certification. Pages are identified where revisions have been made.

Section VI of the State and County plans list the supporting documents to the basic REP plan. The plans are so arranged by "Sections" and "Parts" as to provide a suitable listing, by title and procedures to implement the plan. The plans each contain a table of contents as well as a correlation document which cross references the NUREG 0654/FEMA REP-1, Revision 1 planning criteria to the plan where the criteria is addressed.

III. Exercise Evaluation Summary:

A. Introduction:

In accordance with 44 CFR 350, Paragraphs 350.9, 5.d, and 5.e, two meetings were conducted by FEMA within 48 hours of the completion of each Davis-Besse Nuclear Power Station exercise. Both meetings provided a verbal narrative of the evaluation findings of the Davis-Besse exercise.

The first meeting following the exercise was conducted with State and Local exercise participants. The second meeting was conducted with the public and news media. Both meetings provided an opportunity to make comments concerning the FEMA exercise findings. Written comments were requested from the Public at the close of the meeting. No written comments were received by FEMA Region V.

B. Narrative:

The FEMA Region evaluation teams have evaluated four exercises resulting from a simulated accident at the Davis-Besse Nuclear Power Station. Full participation joint exercises were on November 6, 1980 and July 16, 1985. Partial participation joint exercises were on April 13, 1983 and March 31, 1987.

The comments below address the March 31, 1987 Davis-Besse Nuclear Power Station exercise.

The DBNPS radiological emergency preparedness joint exercise was conducted on March 31, 1987 during normal duty hours. The exercise participants critique was held by FEMA at the DBNPS Administration Building at 1:00 on April 2, 1987. The public and media briefing was held jointly by FEMA and NRC at 3:00 at the same location.

State of Ohio

The State of Ohio selected twenty-three (23) objectives to be demonstrated during the exercise. No deficiencies were identified. There were two (2) areas requiring corrective action identified. Four (4) recommendations for improvement are offered for consideration by the State of Ohio.

This was a partial participation exercise for the State of Ohio, with only the communications, dose assessment and public information sections being fully staffed. The ODSA was able to effectively activate these three sections of the State EOC following receipt and verification of the ALERT notification. The ODSA, OEPA, ODOH, Governor's representative and Toledo Edison liason were present in the State EOC. Staff assigned to the Emergency Coordination Center, the Joint Public Information Center and field monitoring teams were also mobilized and dispatched at the ALERT level. 24-hour staffing capability was evidenced by double staffing or by presentation of a roster.

The ODSA Deputy Director was effectively in charge of the EOC operations. The dose assessment group and the communications group worked well together, with the communications group receiving the information from the field teams and forwarding it to the dose assessment group. Message handling was efficient. The State of Ohio requested federal assistance from both the DOE and FEMA.

The EOC facilities and amenities are adequate to support the emergency response activities. There was a dedicated telephone, datafax, commercial telephone and ODSA radio net available to support communications with the various locations and organizations responding to the simulated emergency at the DBNPS. All of the above communications systems were effectively demonstrated during the exercise, particularly radio communications with the communications van and the field monitoring teams. There was space set aside in the Emergency Coordination Center at the DBNPS Administration Building for the State and Ottawa County representatives. The State and County had full access to the displays and for consultation with utility personnel in the ECC.

The dose assessment room in the State EOC was adequate for performing the functions assigned to the staff located there. Noteworthy is the microcomputer for performing dispersion calculation. The computer also maintains a data base of population density and evacuation studies that is useful for making protective action recommendations. These recommendations were also based on plant conditions, data from the field monitoring teams and predetermined actions associated with emergency classification levels. The dose assessment group provided timely protective action recommendations to the Counties on three occasions during the exercise. The Counties initiated public alerting and notification based on the recommendations they received from the State and the utility.

The ODSA and OEPA mobilized field monitoring teams from Columbus and Bowling Green, respectively. The teams were properly equipped and demonstrated the appropriate procedures for air, soil, vegetation and surface water sample collection. The opportunity to demonstrate snow collection procedures was missed. It is recommended that the field monitoring SOP's describe in greater detail the recently modified operating procedures for the multipurpose survey instrument. It is also recommended that the State of Ohio review its field monitoring training and procedures to determine if they should be revised to reduce the potential for contamination of equipment.

The ODOH Northwest District Office demonstrated milk sampling procedures during the exercise. The team was properly equipped for sampling milk, had personal dosimetry, maps and SOP's, and performed their duties in a professional and effective manner. It is recommended that the milk sampling team be equipped with a two-way radio to facilitate communications.

All samples collected were taken to the Fremont Airport where the samples were consolidated, screened by the ODOH staff, transferred to an Ohio National Guard helicopter and transported to Columbus for laboratory analysis. The procedures for the transport of field monitoring samples should be reviewed with personnel of the Ohio National Guard.

Based on release rates provided by the utility and later confirmed by deposition measurements, the ODOH used plume dispersion models to make recommendations to dairy farmers. The ODOH maintains a data base on the sources of milk. The data base contains the location, owners name and telephone number for dairy farms and processing plants.

The field monitoring teams were equipped with dosimetry kits containing personal dosimeters, record card, dosimeter chargers and TLDs. They were knowledgeable of exposure limits, reading dosimeters and procedures for decontamination. Their radiological exposure was monitored by the field team director.

Based on its calculation of a potential thyroid dose in excess of 25 REM, the State of Ohio recommended the use of KI by institutionalized individuals and emergency workers in the ten (10) mile EPZ in accordance with the current KI policy. However, the distribution of KI could not be fully demonstrated because the State had not uniformly resolved its policy concerning the use of KI by institutionalized individuals and by emergency workers within the distributed in accordance with the final policy. Note: Since the Davis-Besse exercise the State of Ohio on May 22, 1987 approved its policy on the use of KI.

The State has the capability to brief the media at the State EOC, however, there was no media present during the exercise. All media briefings were handled at the JPIC which is located in the DBNPS Administration Building. During the exercise there was a simulated JPIC relocated to the alternate JPIC at the Toledo Edison in downtown TOLEDO. It is recommended that this alternate JPIC be utilized during a future radiological emergency preparedness joint exercise.

The JPIC facility has sufficient space and resources to accommodate the various PIOs and the media. During the exercise six (6) media briefings were conducted. The PIOs effectively coordinated the information to be presented to the media prior to the briefing. There was a separate room set aside for this purpose. Twenty-four (24) periodic news releases were also distributed at the JPIC. These releases were well coordinated and contained general information and information from the County EBS messages.

Rumor control was established at the JPIC. The rumor control staff was effective in coordinating responses to simulated public inquiries. The State, County and utility rumor control telephone numbers were provided during briefings and in the news releases at the JPIC.

Ottawa County

Ottawa County selected twenty-four (24) objectives to be demonstrated during the exercise. All of the objectives were successfully demonstrated by Ottawa County. No deficiencies, areas requiring corrective action or recommendations were identified.

The Ottawa County EOC consisting of the Executive Group and the operational staff mobilized their staff and activated the EOC according to their plan. Around the clock staffing capability was demonstrated by the presentation of a roster or by double staffing.

Their facility is located in the basement of the Ottawa County Court house Annex and is a facility which has been specially designed and equipped to support the staff during emergencies. Classification levels were posted, status boards were maintained and all of the appropriate maps and displays were posted. The staff is well trained and demonstrated an effective response capability to deal with the DBNPS emergency as well as additional minor emergencies that were simulated to have occurred during the incident at the utility.

The President, Ottawa County Board of Commissioners, was effectively in charge of Ottawa County actions. The EOC staff were involved in the decision making process and Ottawa County emergency activities were coordinated with Lucas County.

The staff, utilizing primary as well as alternate means of communication, demonstrated their ability to coordinate with those organizations intended to provide support to the emergency response. There were two dedicated telephone systems in use. One system interlinks the utility with the State of Ohio, Ottawa County and Lucas County. The second system interlinks Lucas County and Ottawa County. Commercial telephone was the primary means of communication for the EOC staff. ARES radios were utilized as backup to contact field locations such as reception and congregate care centers and the decontamination station.

The County effectively acted on three protective action recommendations which included activating the siren system and by providing emergency instructions to the public through EBS. In each case siren and EBS activation were coordinated with Lucas County and accomplished within fifteen minutes. The

affected areas were described in terms of familiar boundaries and landmarks. Appropriate information to evacuees, transients and sheltered populations were provided in the EBS messages.

Utilizing existing inclement weather conditions, experienced during the exercise, the staff prepared themselves to deal with any impediments which could be experienced while implementing any combination of protective action recommendations.

The County ensured that media releases at the JPIC were coordinated and that EBS messages were concise. A rumor control system was established in the EOC to respond to inquiries from concerned citizens.

Should evacuation occur, the County is able to establish control points to monitor access to the affected areas. Two traffic control points were established in the field during the exercise.

The Benton-Carroll-Salem School District and the Carroll Elementary School participated in alerting and activating their school evacuation plan. The demonstration included mobilizing and equipping bus drivers to carry out their evacuation procedures. The students at the Carroll School were loaded into their buses. The school facility was secured and a notice left for parents identify the location of their children.

An emergency worker decontamination station was demonstrated at the Clay-Genoa Volunteer Fire Department. The staff demonstrated proficiency in the use of equipment and the procedures for the decontamination of emergency workers and their vehicles. The corrective action for a weakness from the previous exercise was demonstrated and the weakness did not recur.

A mid-County EMS ambulance crew demonstrated the equipment and procedures for effectively handling a contaminated individual. The ambulance crew was well trained and properly equipped.

In a separate medical drill conducted on September 11, 1986, the Emergency Room staff of the Fremont Memorial Hospital in Fremont demonstrated the facilities and procedures for handling a contaminated injured individual. The hospital staff were knowledgeable of their responsibilities and capably demonstrated the treatment and decontamination of the patient. A Carroll Township EMS ambulance crew demonstrated the equipment and procedures for effectively handling a contaminated injured individual. The ambulance crew was well trained and properly equipped.

Officials at the Ottawa National Wildlife Refuge, the Crane Creek State Park and the Crane Creek Wildlife Experiment Station were interviewed during the exercise. Message logs indicated that notification had been received from both the Ottawa County Sheriff and the ODSA during the ALERT classification as per the plan. The Officers-in-Charge had SOP manuals and personal dosimetry kits. They were knowledgeable of the necessary protective actions and had received appropriate training. Public instructions would be provided by various means including bullhorns, boats and public address systems in vehicles.

Emergency workers performing tasks in the field were checked to see if adequate procedures were implemented to provide them with adequate personal dosimetry. Dosimetry kits contained the appropriate dosimetry and emergency workers were aware of their responsibility to report hourly readings to the responsible officials. In the absence of the final State procedures for the use of KI and a supply of KI, Ottawa County simulated the issuance and administering of KI by emergency workers when instructed to do so by the State.

Although it was not an exercise objective the executive group as well as interested staff remained in the EOC after completion of the exercise to discuss the procedures they may anticipate a while implementing recovery and reentry procedures. They discussed procedures for returning their community to a normal condition as quickly as possible while ensuring that the health and welfare of the affected population was well cared for.

Erie County

Erie County served as a host County for some of the simulated Ottawa County evacuees. As such there were no exercise objectives specifically selected by Erie County. However, the two (2) objectives related to the relocation and congregate care centers selected by Ottawa County were also evaluated in Erie County. No deficiencies or areas requiring corrective action were identified. Two (2) recommendations for improvement are offered for consideration by Erie County as well as other host counties.

The Erie County EOC was activated following receipt of the SITE AREA EMERGENCY notification from Ottawa County. The responsibility of the EOC staff was to coordinate emergency services (law enforcement, fire and rescue) and facilitate the activation and operation of the reception and congregate care centers. Telephones and radios were the primary means of communication between the Erie County EOC and the field locations as well as Ottawa County.

Once the Erie County EOC was activated, the EOC staff placed appropriate reception and congregate care center personnel on standby. The reception center was located at the Sandusky High School and the congregate care center at the Jackson Junior High School. These two facilities were activated within one hour of the receipt of the GENERAL EMERGENCY notification.

Simulated evacuees were monitored, decontaminated as appropriate, and registered at the relocation center and then transported to the congregate care center. The congregate care facility was adequate to house the 200 evacuees as stated in the plan. The facility was laid out with a nursing station, kitchen facilities, recreation area, sleeping areas, shower and toilet facilities, and separate areas for mothers with infants and people with illnesses. The staff conducting the activities at both centers were knowledgeable of their emergency responsibilities and demonstrated a high level of training as they effectively carried out their assignments.

It is recommended that JPIC news releases be routinely distributed to the host Counties, either to the EOC or directly to the congregate care centers. This information would be of interest to evacuees and useful for the handling of rumor control at the care centers.

There were significant periods of inactivity in the EOC and following field demonstrations during the exercise. It is recommended that the controllers inject "free play" activities to drive actions by the staff during these periods and that consideration be given to terminating field activities once the objectives have been demonstrated and the evaluation at that location is complete.

Lucas County

Lucas County selected twenty-four (24) objectives to be demonstrated during the exercise. All of the objectives were successfully demonstrated by Lucas County. No deficiencies or areas requiring corrective action were identified. Four (4) recommendations for improvement are offered for consideration by Lucas County.

Partial mobilization of the Lucas County EOC staff began when the DBNPS informed the Lucas County Sheriff's dispatch center that an UNUSUAL EVENT had occurred. Partial activation of the EOC began following receipt of the ALERT notification from the utility. Completion of the EOC activation occurred after receipt of the SITE AREA EMERGENCY notification. The EOC was fully staffed with around the clock staffing capability demonstrated by presentation of a roster or replacement staff.

The Lucas County EOC Executive Group consists of the three Lucas County Board of Commissioners, the Lucas County Sheriff, the Lucas County Disaster Services Director, and a Jerusalem Township Trustee. The Mayors of the Cities of Oregon and Toledo are optional members of the Lucas County Executive Group.

The president, Lucas County Board of Commissioners, was effectively in charge of Lucas County actions. The EOC staff were involved in the decision making process and Lucas County emergency activities were coordinated with Ottawa County. It is recommended that the EOC staff be more involved in making presentations of their key response activities during EOC briefings.

The newly developed EOC is located in the sub-basement of the Lucas County Correctional Facility in Toledo. This facility is spacious, well lighted with sufficient amenities to support emergency staff for an extended period of time. Classification levels were posted, status boards were maintained and all of the appropriate maps and displays were posted.

There were two dedicated telephone systems in use. One system interlinks the utility with the State of Ohio, Ottawa County and Lucas County. The second system interlinks Lucas County with Ottawa County. Commercial telephone was the primary means of communication for the EOC staff. ARES radios were utilized as backup to contact field locations such as reception and congregate care centers and the decontamination station. County Sheriff's dispatch center radios provide a means of backup communication. Not all of the planned radio systems are currently installed. They are scheduled for installation in the near future. There was a hard copy datafax capability to the JPIC, Ottawa County and the State EOC.

Lucas County considered both the utility and the State protective action recommendations and other factors such as plant status, evacuation time estimates and weather in formulating the protective actions taken by the County. Three protective actions to shelter and/or evacuate people and shelter livestock were implemented by the County during the exercise.

The County initiated action to promptly alert and notify the public of protective action recommendations three times during the exercise. In each case siren and EBS activation were coordinated with Ottawa County and accomplished within fifteen minutes. The affected areas were described in terms of familiar boundaries and landmarks. Appropriate information to evacuees, transients and sheltered populations were provided in the EBS messages and the news releases at the JPIC.

The EOC staff determined the appropriate traffic and access control points for each protective action recommendation. One access control point was manned by the Sheriff's Department. The deputy was knowledgeable about his duties, evacuation routes and the location of the reception and congregate care centers and the decontamination station. He had the appropriate dosimetry and was knowledgeable about its use, reporting requirements and the maximum allowable exposure levels.

Each agency had a Dosimetry Coordinator who maintains a written record of their workers' radiological exposure. Each emergency worker was instructed to provide hourly reports of exposure to his Dosimetry Coordinator. The Dosimetry Coordinators were instructed to contact the Lucas County Radiological Operations Officer only if readings reached 1, 5 or 15 rads. It is recommended that each Dosimetry Coordinator provide periodic status reports to the Radiological Operations Officer so he can monitor emergency worker exposure levels and ensure that effective monitoring is being accomplished.

In the absence of the final State procedures for the use of KI and a supply of KI, Lucas County simulated the issuance and administering of KI by emergency workers when instructed to do so by the State.

A simulated traffic obstruction on SR2 was handled by the EOC staff. Traffic was routed around the obstruction until its simulated removal by the Ohio National Guard.

A list of mobility impaired individuals is maintained by the Jerusalem Township Fire Department. Transportation for the simulated evacuation of the mobility impaired individuals was provided by the Regional Emergency Medical Services of Northern Ohio (REMSNO).

There are no schools within the Lucas County portion of the 10-mile EPZ. As a precaution, the Jerusalem Elementary School was relocated to the Eisenhower Junior High School. Relocation procedures were reviewed with the Superintendent, the Transportation Director and the Business Manager of the Oregon School System, the principals of the two schools and a bus driver. It is recommended that the name of the Dosimetry Coordinator and the policy that homeroom teachers accompany their students be specified in the SOPs.

Following receipt of the SITE AREA EMERGENCY notification the EOC staff placed appropriate reception and congregate care center and decontamination station personnel on standby. Activation of these facilities was initiated after receipt of the GENERAL EMERGENCY notification and were fully activated within an hour.

The City of Oregon Fire Department and Lucas County Human Services demonstrated the procedures for radiological monitoring, decontamination and registration of a simulated evacuee at the reception center which was located at the Eisenhower Junior High School in Oregon. The staff conducting these activities were knowledgeable of their duties and demonstrated the capability to carry out their assignments reflecting a high level of prior training. The radiological monitoring staff was equipped with personal dosimetry and were knowledgeable about its use.

Once registered evacuees would be transported to a congregate care center by bus. One such facility was demonstrated at the Clay High School in Oregon which was staffed by the Red Cross. The facility had access to sufficient resources to handle the 230 simulated evacuees. The staff was knowledgeable of their emergency responsibilities.

An emergency worker decontamination station was demonstrated at the Jerusalem Township Fire Department. The appropriate resources for decontamination of personnel and vehicles are maintained at this facility. The staff demonstrated proficiency in the use of equipment and procedures for decontamination of two emergency workers and one vehicle.

The Jerusalem Township Fire Department also demonstrated the equipment and procedures to handle and transport a contaminated injured individual. The ambulance crew was well trained and properly equipped. They demonstrated the capability of establishing communications with the appropriate hospital, the Lucas County EOC and a traffic control point.

In a separate medical drill, the Emergency Room staff of the St. Charles Hospital in Oregon demonstrated the facilities and procedures for handling a contaminated injured individual. The hospital staff were knowledgeable of their responsibilities and capably demonstrated the treatment and decontamination of the patient.

The Lucas County public information liaison in the EOC coordinated information with the Lucas County PIO at the JPIC. Rumor control activities were also coordinated with the Lucas County PIO at the JPIC. A rumor control station was established in the EOC and its telephone number announced over EBS, in news releases and at JPIC briefings. The Lucas County PIO demonstrated adequate training and knowledge of his duties. He effectively coordinated information with the other spokespersons at the JPIC and participated in all of the JPIC briefings.

There were significant periods of inactivity in the EOC and following field demonstrations during the exercise. It is recommended that the controllers inject "free Play" activities to drive actions by the staff during these periods and that consideration be given to terminating field activities once the objectives have been demonstrated and the evaluation at that location is complete.

IV. Adequacy of Radiological Emergency Preparedness:

The evaluations of State and local preparedness and the implementation of the plans demonstrates the State of Ohio and Lucas and Ottawa Counties, Ohio can effectively respond to a radiological emergency resulting from an accident at the Davis-Besse Nuclear Power Station.

The Regional Assistance Committee plan review consensus document for the State of Ohio, Lucas and Ottawa Counties, Ohio is attached to this document. Inadequacies in planning have been sent to the State of Ohio for correction. The inadequate criteria items in the plans are being corrected and will be reflected in the next revisions to the plan. There are no planning deficiencies of a magnitude which would impede the health and safety of the people in the vicinity of the Davis-Besse Nuclear Power Station.

The FEMA Region V report of the March 31, 1987 Davis-Besse exercise is also attached to this document. The report of the March 31, 1987 Davis-Besse Nuclear Power Station exercise was transmitted to the State of Ohio April 20, 1987. The State of Ohio's schedule of corrective actions to FEMA Region V's report of the March 31, 1987 Davis-Besse Nuclear Power Station exercise is also attached to this document. The exercise weaknesses are not of a magnitude which would impede the health and safety of the people in the vicinity of the Davis-Besse Nuclear Power Station.

It is, therefore, recommended that the Federal Emergency Management Agency approve the State of Ohio and Lucas and Ottawa Counties radiological emergency preparedness plans for the Davis-Besse Nuclear Power Station.

FEDERAL EMERGENCY MANAGEMENT AGENCY
DAVIS-BESSE NUCLEAR POWER STATION

Public Meeting held at Eisenhower
Junior High School, 331 N. Curtice Rd.,
Oregon, Ohio, on Thursday, April 30, 1987,
at 7:00 o'clock p.m.

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COMPUTER TRANSCRIPT

1 PROCEEDINGS

2 MR. BEMENT: Good evening and
3 welcome. My name is Dan Bement, an
4 Emergency Management Program Specialist
5 with the Federal Emergency Management
6 Agency, Region V.

7 I want to welcome you to this
8 public meeting. We are having this public
9 meeting as part of the overall licensing
10 reprocess of the Davis Bess Nuclear Power
11 Station.

12 Before we go any further, I would
13 like to make sure that the audience is
14 aware of the fact that there is a sign-in
15 sheet at the entrance to this auditorium.
16 We are asking that you sign-in for the
17 record.

18 Also at the entrance to the
19 auditorium should be public statement forms
20 if you care to make a statement at this
21 meeting for the record.

22 We will gather them up for the
23 question and answer period at the end of

1 the formal presentations.

2 This public meeting is being
3 conducted in accordance with the
4 requirements of 44 CFR 350.10. This
5 section is entitled, "Public Meeting in
6 Advance of FEMA Approval," and calls for
7 several things.

8 First the meeting is to acquaint
9 the members of the public in the vicinity
10 of the Davis Besse Nuclear Power Station
11 with the content of the State of Ohio and
12 Ottawa County plans for the response to
13 radiation emergencies at licensed nuclear
14 facilities, and the Lucas County, Ohio
15 Radiological Emergency Plan and the conduct
16 of joint exercises which tested the plans.

17 I might point out that there have
18 been four previous exercises that involved
19 state and county participation.

20 The second reason for the public
21 meeting is to answer question about FEMA's
22 review of the plans and exercises.

23 The third is to receive suggestions

1 from the public concerning improvements of
2 changes that may be necessary.

3 Fourth is to describe to the public
4 the way in which the plans are expected to
5 function in the event of an actual
6 emergency.

7 This is actually the second public
8 meeting conducted in accordance with the
9 requirements of 44 CFR 350.10. The first
10 public meeting was conducted November 7,
11 1980, for the purpose of explaining the
12 State of Ohio and Ottawa County, Ohio,
13 plans in support of the Davis Besse Nuclear
14 Power Station.

15 This meeting is required in that
16 since that public meeting, the plan has
17 changed to include the Lucas County plan
18 which has been developed in support of
19 Davis Besse.

20 As such, this public meeting is to
21 acquaint the public with the State of Ohio
22 plan and the Ottawa County plan and to
23 acquaint you with the newly developed Lucas

COMPUTER TRANSCRIPT

1 response to their questions or comments.

2 Let me say this right now. We are
3 not here to address in any way the pros and
4 cons of nuclear power itself. We are not
5 here to talk about whether or not nuclear
6 power is good or bad. We are here to talk
7 about the plans preliminary draft of the
8 exercise.

9 With that, I would like to
10 introduce tonight's panel.

11 I am Dan Bement as I introduced
12 myself earlier. To my right is Thomas J.
13 Ploski, who is the Senior Emergency
14 Preparedness Analysis of the Nuclear
15 Regulatory Commission, Region 3.

16 To his immediate right is Mr. Ken
17 Cole, Chief of the Technological Hazards
18 Branch, Ohio Disaster Services Agency. He
19 is from Columbus.

20 To his right is James P. Greer,
21 Director, Ottawa County Disaster Services
22 Agency.

23 To his right is Donald T. Hickey,

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1 Director, Lucas County Disaster Services
2 Agency.

3 To my far right is Mr. Don Shelton,
4 Vice President, Nuclear Davis Besse Nuclear
5 Power Station.

6 Let me start tonight's presentation
7 by discussing the role of the Federal
8 Emergency Management Agency. In reality, I
9 am representing not only the Federal
10 Emergency Management Agency, but also the
11 Regional Assistance Committee which is
12 chaired by FEMA and of which I am a former
13 chairman of that committee.

14 My purpose here this evening is to
15 provide you with some information about the
16 role of both organizations and a brief
17 summary of their activities to date with
18 respect to the offsite plans in support of
19 the Davis Besse Nuclear Power Station.

20 The Regional Assistance Committee
21 which is referred to as RAC, is composed of
22 nine Federal agencies with various
23 expertise in the area of radiological

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1 emergency preparedness. These agencies
2 are:

3 Department of Agriculture

4 Department of Energy

5 Department of Health and Human

6 Services, Food and Drug

7 Administration

8 Department of Health and Human

9 Services, Public Health Service

10 Environmental Protection Agency

11 Department of Interior

12 Nuclear Regulatory Agency

13 Department of Transportation

14 and the Federal Emergency

15 Management Agency itself.

16 I am not going to take the time to
17 identify each agency's specific role.

18 Suffice is to say that these nine agencies

19 do have specific knowledge and expertise

20 for the RAC to provide assistance to state

21 and local governments in their radiological

22 emergency response planning efforts.

23 Specifically this assistance falls within

1 one of five major responsibilities of the
2 RAC.

3 First, RAC provides and has
4 provided the past two years guidance and
5 planning assistance. Basically that has
6 been to the state and local government.
7 During the development of the Davis Besse
8 offsite plan, the RAC, either as a whole
9 or by individual agencies assisted the
10 state and local planners in this plan
11 formulation. Assistance would take the
12 form of meetings, detailed discussions and
13 offer interpretation of guidance materials.

14 Second; RAC offers evaluation of
15 state and local plans. During the planning
16 process, RAC informally reviewed -- and I
17 will indicate later, at one point formally
18 reviewed the Davis Besse offsite plans
19 against the planning standards of
20 NUREG-0654, FEMA-REP-1, Revision 1, which
21 is the Federal Planning Guide for state and
22 local governments to help develop those
23 plans.

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1 We also offered other guidance
2 material and these reviewed comments are
3 considered by the state and local planners
4 in their preparation of the final plans.

5 Following the submittal of the
6 final Davis Besse offsite plans of FEMA by
7 former Governor Rhodes, the RAC did
8 complete a formal review for the record by
9 the State of Ohio and I will talk more on
10 this particular point later.

11 Third, the RAC has responsibility
12 and can help in the design of the exercises
13 that primarily is involved with the
14 evaluation of radiological emergency
15 preparedness exercises. The RAC can
16 provide assistance in the design of
17 exercises, but in this case our role is
18 limited mostly to the evaluation of the
19 exercises.

20 Specifically, during these
21 exercises we evaluated the Davis Besse
22 offsite plans themselves, consisting of
23 state and local government, the state and

1 government knowledge of their plans and the
2 ability of state and local government to
3 implement the plans.

4 When problems occurred during the
5 exercises, the RAC provided suggestions to
6 overcome these problems such as changes in
7 the plan, additional training for
8 participants, et cetera. I will talk more
9 on exercises a little bit later.

10 The fourth area of responsibility
11 for RAC is in the area of continuing review
12 of plans. The Davis Besse plan is not a
13 one time document that when completed is
14 then put on a shelf to gather dust. This
15 is a dynamic document that must be
16 constantly reviewed and updated to meet
17 ever changing conditions. Specifically
18 FEMA and the RAC review these periodic
19 updates on a continuing basis.

20 Lastly, RAC has responsibility in
21 the area of training. RAC assesses the
22 level of training which is identified in
23 the Davis Besse Plan which state and local

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1 emergency workers demonstrate during
2 exercises. RAC may assist in the
3 development of the training courses and
4 provide training for specific state and
5 local emergency workers either at their
6 request or as a result of weaknesses
7 identified during exercises.

8 Very briefly, then that's the role
9 of the Regional Assistance Committee
10 commonly referred to as RAC. Now, I will
11 switch hats and I'll address the FEMA's
12 role. As you may have gathered by now, the
13 process leading up to the licensing of a
14 commercial nuclear power facility is quite
15 complex.

16 For planning purposes, preparedness
17 can be split roughly into two parts. There
18 is the on-site which is the utility and the
19 offsite which is state and local
20 government.

21 Before we simplify this though and
22 give you the wrong impression, let me
23 assure you that each of these two

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1 components do not operate in isolation of
2 one another.

3 They do it by interreacting at many
4 locations and they really cannot be as
5 easily separated as I might make it sound
6 to you in my remarks.

7 FEMA's role in the overall review
8 process is limited to the review and
9 approval of state and local radiological
10 emergency plans and preparedness.

11 The process by which FEMA fulfills
12 this responsibility is outlined in 45 EFR
13 Part 350 of the Federal Code.

14 FEMA's end product, which hopefully
15 will be the approval of the Davis Besse
16 offsite Plant, is provided to the NRC for
17 their use in the overall licensing process.

18 What are the specific steps leading
19 up to the approval by FEMA of the Davis
20 Besse offsite Plan? Well, obviously, the
21 first step is the development of the plan
22 itself. Obviously that process is when the
23 governor of a state or his designated state

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1 official believes that the plan is adequate
2 to protect the public health and safety, he
3 will then submit it to FEMA for review in
4 accordance with the provisions of the
5 regulations.

6 As I stated earlier, former
7 Governor Rhodes submitted the Davis Besse
8 Plant to FEMA on February 25, 1981. FEMA
9 acknowledged the Governor's submittal, and
10 then on April 13, 1981, published a notice
11 in the Federal Register announcing receipt
12 of the Davis Besse Plan.

13 On April 29, 1982, FEMA Region V
14 became concerned about radiological
15 emergency planning for Lucas County, as it
16 relates to the Davis Besse Nuclear Power
17 Station which is a short distance from
18 here.

19 The original intent of the planning
20 was that the Lucas County residents and
21 transients were to be provided for in the
22 Ottawa County plan.

23 Initially, FEMA Region V and the

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1 Regional Assistance Committee thought that
2 this may be an acceptable solution due to
3 the demography involved. However, after
4 further consideration, FEMA concluded that
5 a radiological emergency preparedness plan
6 should be developed for people in that
7 portion of Lucas County that lie within the
8 10-mile emergency planning zone of the
9 Davis Besse Nuclear Power Station.

10 FEMA Region V informed Ohio of this
11 decision in a letter dated June 29, 1982.
12 FEMA Region V also informed Ohio that
13 processing of the Regional Director's
14 Evaluation which was in process at that
15 time would be precluded until a Lucas
16 County plan was developed.

17 Several meetings and discussions
18 were conducted by ^{Federal,} State, Local and utility
19 planners concerning modifications of the
20 Davis Besse 10-mile EPZ. This effort
21 culminated in correspondence from ODSA
22 dated July 8, 1986, that identified actions
23 to be taken or proposed to resolve the

1 outstanding issues.

2 Included with the July 8, 1986,
3 letter, was an attachment identifying
4 milestones and completion dates and
5 including the following and the milestones
6 included:

7 By September 3, 1986, that the
8 Lucas County REP plan be submitted by the
9 Lucas County Commissioners for State
10 review.

11 That by September 23, 1986, key
12 players from Locas County, Ottawa County
13 and ODSA demonstrate certain emergency
14 response functions in conjunction with a
15 utility only exercise conducted for Davis
16 Besse.

17 On December 30, 1986, submission of
18 a Lucas County REP plan and revisions to
19 the Ottawa County and State of Ohio plans
20 FEMA Region V for review under 44 CFR 350.

21 And by March 31, 1987, an exercise
22 involving full participation by Lucas
23 County and Ottawa County and partial

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1 participation by the State of Ohio.

2 That by April 30, 1987, a public
3 meeting held in accordance with FEMA
4 regulations which I indicated to you
5 earlier.

6 A memorandum of understanding for
7 the protection of citizens in Jerusalem
8 Township was also completed prior to the
9 planned recent startup of the Davis Besse
10 Nuclear Power Station.

11 The Davis Besse Regional Director's
12 Evaluation was returned to FEMA Region V
13 for us to hold and revise once the Lucas
14 County plan was developed and revisions for
15 the state and the county plans were
16 developed and completed and then
17 implemented during a joint Davis Besse
18 exercise.

19 If you recall, I mentioned a
20 document called NUREG-0654 FEMA-REP-1,
21 Revision 1. I mentioned that earlier.
22 This document also has a long bureaucratic
23 title which is, "The Criteria for the

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1 Preparation and Evaluation of Radiological
2 Emergency Response Plans and Preparedness
3 in Support of Nuclear Power Plants."

4 It is usually referred to as
5 NUREG-0654.

6 This Federal document which is used
7 by utilities and state and local
8 governments contain 16 planning standards,
9 each of which has several specific criteria
10 associated with it.

11 These criteria may apply to the
12 utility, the state, local government or any
13 combination thereof. The ~~off~~side plans for
14 Davis Besse were developed using this
15 document as a guide.

16 I have already addressed the
17 process by which the Davis Besse offsite
18 plans were reviewed by RAC. I would like
19 to point out that these offsite plans were
20 informally reviewed by the Regional
21 Assistance Committee Board February 24,
22 1987.

23 At that meeting we reviewed the

1 newly developed Lucas County Plan, the
2 revised Ottawa County Plan and the revised
3 State of Ohio Plan.

4 Before a plan can be approved by
5 FEMA, two additional requirements must be
6 met. One of these as I indicated before is
7 a public meeting. This meeting requirement
8 is being fulfilled this evening.

9 I would like to point out all the
10 advanced publicity and notification of this
11 meeting was provided for in 44 CFK Part
12 350.10 and were met by the state.

13 These included newspaper notices
14 two weeks prior and again a few days prior
15 to the public meeting, notice to local
16 radio and television stations about one
17 week prior to the public meeting.

18 The purpose of the public meetings
19 were mentioned earlier in my opening
20 statement so I will not repeat them again.

21 The other requirements for a joint
22 exercise of the Davis Besse offsite plan
23 involving full participation of local

1 government in this exercise and partial
2 involvement of the state government in the
3 State of Ohio and the licensee which in
4 this case is Davis Besse.

5 This exercise was conducted on
6 March 31, 1987. Previous exercises
7 involving full participation by the State
8 of Ohio and Ottawa County were conducted
9 first in May of 1979. Another one on
10 November 6, 1980. A further exercise April
11 13-14 of 1983 and then again on July 16,
12 1985.

13 Each of these exercises was
14 following by two meetings, a participant's
15 critique, a player's critique and public
16 and media briefing.

17 This is usually held within 48
18 hours of the completion of the exercise.

19 I would like to briefly discuss
20 FEMA's findings with respect to the March
21 31, 1987, exercise. Before I do, I need to
22 explain the grading system used by our FEMA
23 in evaluating the exercise.

1 When we are evaluating state and
2 local government during a radiological
3 emergency exercise we are looking for
4 weaknesses. We also want to identify
5 strong points but the primary concern would
6 be in finding weaknesses, if any, in the
7 planning or in the implementation of the
8 plan.

9 In that sense we have a weakness as
10 defined as a deficiency. A deficiency is,
11 if that event happened or failed to happen
12 during a real emergency the public health
13 and safety would have been affected.

14 In that sense it is a very serious
15 weakness.

16 The second category of weakness
17 that we need to categorize and evaluate is
18 the area requiring corrective action. What
19 this is, the event observed during the
20 exercise would not affect public health and
21 safety if it had occurred during a real
22 emergency. The issue is serious enough,
23 though, that FEMA requires a schedule of

1 corrective actions to correct the matter.

2 The third weakness category is
3 known as area recommended for improvement.

4 The event observed during the
5 exercise would not affect public health and
6 safety if it had occurred during a real
7 emergency. The issue is brought to the
8 attention of state and local government as
9 a recommendation to improve plans and
10 operations. No schedule of corrective
11 actions are required on the part of FEMA.
12 This just identifies how we evaluate.

13 On March 31, 1987, there was a joint
14 exercise as I indicated earlier conducted
15 which involved full participation by Davis
16 Besse Nuclear Power Station, the Counties
17 of Ottawa and Lucas and the partial
18 participation by the State of Ohio.

19 Ohio participated fully during the
20 July 16, 1985 Davis Besse exercise and in
21 November 19, 1986, Beaver Valley exercise.

22 A draft exercise report of the
23 March 31, 1987 Davis Besse exercise was

1 submitted by the FEMA Region V to the State
2 of Ohio on April 20, 1987.

3 FEMA had requested a schedule of
4 corrective actions by the State on May 20,
5 1987.

6 The schedule of corrective actions
7 is to correct areas requiring corrective
8 actions to be taken as outlined and
9 identified in the draft report.

10 Once this schedule of corrective
11 actions is received, FEMA Region V will
12 submit the final report of the exercise to
13 FEMA headquarters for their review and
14 subsequent submission to the Nuclear
15 Regulatory Commission.

16 All but one of the major components
17 of the Davis Besse offsite plans selected
18 for demonstration during the exercise was
19 successfully completed with no deficiencies
20 identified.

21 Two areas requiring corrective
22 actions were identified for the State of
23 Ohio but none for either Ottawa or Lucas

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1 County.

2 The two areas requiring corrective
3 actions for the State of Ohio involved
4 criteria H.12 which is the procedures for
5 the transport of field monitoring samples
6 which should be reviewed with personnel
7 with the Ohio National Guard to ensure that
8 all crew members are fully aware of their
9 radiological emergency responsibilities and
10 criteria items J.10.e & J.10.f which is
11 part of NUREG-0654 that is, that the State
12 of Ohio should finalize its draft K1 policy
13 and demonstrate its implementation of that
14 policy during the next full participation
15 of their radiological emergency
16 preparedness exercise.

17 In summary then, the March 31, 1987
18 joint exercise qualifies as the initial
19 joint exercise for the requirement of 44
20 CFR 350.9. Nothing observed during the
21 previous joint exercises has resulted in a
22 finding that offsite emergency preparedness
23 was not adequate to provide reasonable

1 assurance that the appropriate protective
2 measures can be taken to protect the health
3 and safety of the public living in the
4 vicinity of the Davis Besse Nuclear Power
5 Station in the event of a radiological
6 emergency.

7 Preliminary findings with respect
8 to the March 31, 1987 joint exercise has
9 resulted in a similar conclusion. However,
10 the findings with respect to that exercise
11 have not yet been formally transmitted to
12 the NRC by FEMA and are, therefore, still
13 considered preliminary.

14 There is one preparedness
15 requirement, which, because of its complex
16 planning standards and relative importance
17 was also tested and certified independent
18 of the exercise process. This is the
19 prompt alert and notification system. The
20 design report for this system is in the
21 vicinity of the Davis Besse and has been
22 reviewed by FEMA and the system itself was
23 formally tested by FEMA on May 21, 1985.

1 This test involved an activation of
2 the total system followed by a survey of a
3 representative sample of residents in the
4 vicinity of Davis Besse Nuclear Power
5 Station to determine the effectiveness of
6 the system.

7 Since the test the system has been
8 enhanced. Periodic performance reports are
9 being submitted to FEMA. The system
10 currently awaits FEMA approval.

11 Now, I will try to tie all of this
12 together. Following this public meeting,
13 FEMA Region V will assemble a document
14 which includes the results of each of these
15 requirements which I have discussed this
16 evening. This document, formally known as
17 Regional Director's 350 Evaluation will be
18 forwarded to the Associate Director for
19 State and Local Programs and Support at
20 FEMA Headquarters.

21 When it is submitted it will have
22 on it the Regional Director's
23 recommendations for the approval of the

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1 Davis Besse offsite plans. Our schedule
2 currently calls for this document to be
3 submitted to FEMA Headquarters in September
4 of this year.

5 At that point, the 350 evaluation
6 will be submitted and reviewed by FEMA
7 Headquarters staff as well as the national
8 offices of other RAC agencies for final
9 concurrence.

10 If the Associate Director
11 determines that the plans and preparedness
12 are adequate to protect the public health
13 and safety of the residents in the vicinity
14 of Davis Besse Nuclear Power Station and
15 are capable of being implemented, he will
16 approve the Davis Besse plans in writing.

17 When that is done he will
18 communicate the approval to Governor
19 Celeste, the NRC and the FEMA Region V
20 Director.

21 They will also publish a notice of
22 approval in the Federal Register. If the
23 Associate Director is not satisfied with

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1 the plans and preparedness, he will
2 communicate that decision along with the
3 reasons for it to the NRC and the FEMA
4 Region V Director and to Governor Celeste
5 through the FEMA Regional Director. He
6 will also publish a notice to that effect
7 in the Federal Register.

8 The last point I wish to address is
9 what does NRC use in their regulatory
10 process in the absence of the FEMA Regional
11 Director's 350 evaluation. Under a
12 memorandum of understanding between
13 and NRC, during the licensing process, the
14 NRC can periodically request of FEMA status
15 reports or interim findings on emergency
16 preparedness. In fact, NRC ~~is~~ ^{has} requested
17 interim findings from FEMA on emergency
18 preparedness for the various sites during
19 the past several years.

20 It was under the MOU, that FEMA
21 informed the NRC that the previously
22 submitted FEMA Regional Director'
23 Evaluation was being returned to FEMA

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1 informing him of our plans. We request
2 that the Federal Emergency Management
3 Agency consider the information contained
4 in this report in their deliberations."

5 This letter is signed Raymond R.
6 Galloway, Major General, Adjutant General.

7 The document will be considered by
8 FEMA in its deliberations in helping
9 develop findings relating to the evaluation
10 of Davis Besse.

11 At this point I will thank you for
12 your attention and I will be happy to
13 answer any of your questions during the
14 question and answer session.

15 I would now like to introduce the
16 next speaker, Mr. Thomas J. Ploski, from
17 the NRC Region 3.

18 MR. PLOSKI: Thank you, Dan. As Dan
19 mentioned I am from the NRC Region 3 office
20 of Glen Ellyn, Illinois and am a Senior
21 Emergency Preparedness Analysis.

22 This evening I would like to
23 describe to you NRC's inspection efforts

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1 associated with the Emergency Preparedness
2 Program for the Davis Besse Nuclear Power
3 Station. In late 1980, the NRC published
4 its upgraded emergency plan regulations.
5 At about the same time FEMA and NRC jointly
6 published NUREG-0654 in preparation for
7 evaluation of emergency plans.

8 As Dan mentioned, NUREG-0654
9 basically restates the 16 emergency
10 planning standards in the NRC regulations
11 and it contains more specific guidance and
12 how the 16 standards can be met by an
13 emergency plan incurred by the utility,
14 state or county.

15 Davis Besse Emergency Plan was
16 submitted for NRC approval in the spring of
17 1980. Although this was several months
18 before the final publication of the NRC
19 emergency planning regulations and
20 NUREG-0654, the plan was evaluated with
21 respect to these updated requirements and
22 guidelines.

23 In the NRC review process, some

1 changes for the plan were required before
2 it could be considered separately, so the
3 plan was revised and resubmitted for NRC
4 review several times during 1981 and 1982.

5 In October of 1982, the NRC safety
6 evaluation report restated that the June,
7 1982 Davis Besse Emergency Plan had met the
8 NRC emergency plan regulations.

9 The Davis Besse Plan like those
10 of other nuclear power plants have changed
11 over the years.

12 To be sure that all changes to the
13 utilities emergency plans are acceptable,
14 the NRC requires that all revisions for the
15 plan must be submitted for review within 30
16 days of implementation.

17 Furthermore, if the utility feels
18 that the proposed change in the plan may be
19 viewed by the NRC as decreasing
20 effectiveness of the plan, then such
21 changes must be approved by the NRC before
22 they can be implemented.

23 Since 1982, the Davis Besse

1 Emergency Plan has undergone a number of
2 revisions. The current revision is No. 10
3 and was submitted to the NRC in the Fall of
4 1986 and reviewed and approved by the NRC.

5 Each emergency plan revis that
6 it made between October of 1980 and 1986
7 were also approved by the NRC.

8 Several copies of the Davis Besse
9 Emergency Plan and its implementation
10 procesures are maintained in the NRC
11 Division 3 Headquarters Offices.

12 In Region 3, the standard practice
13 that an emergency planning analysis review
14 any implementing procedure changes that
15 also must be submitted by the utility.

16 Another set of current Davis Besse
17 Emergency Plans implementing procedures
18 must be prepared. The NRC emergency
19 preparedness inspection effort is much more
20 than an inhouse paperwork review of
21 emergency planning procedure .

22 During the year 1980, emergency
23 preparedness preparation was done at all

1 midwest nuclear power plants that have
2 already operating licenses. These were two
3 week inspections that were done by a group
4 of five NRC inspectors. The appraisal was
5 very broad in scope. It included
6 evaluation of the utility's plans for
7 management preparedness program, for
8 establishing and training an emergency
9 organization and rapid assembly of this
10 organization at any time.

11 The appraisal also included
12 evaluations of planned emergency response
13 facilities and equipment used by the
14 emergency organization.

15 Provision for conducting periodic
16 emergency drills and exercises were also
17 evaluated as were the provisions for
18 periodic review of planned procedures for
19 emergency preparedness programs and for
20 periodically testing the emergency
21 equipment.

22 A great deal of emphasis was also
23 placed on emphasis of interviews of members

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1 with members of the emergency organization.

2 The two week appraisal of the Davis
3 Besse Emergency Preparedness Program took
4 place in early 1982.

5 As is typical for these appraisals,
6 a number of items requiring corrective
7 action were identified as were a number of
8 suggested refinements to the program.

9 Follow up inspections were
10 performed later in 1982 and in 1983 to
11 verify that the required corrective actions
12 were completed as Toledo Edison had
13 committed to do.

14 Perhaps the best known NRC's
15 inspection efforts with respect to
16 emergency preparedness are evaluations of
17 the utility's performance during the annual
18 exercises.

19 Each nuclear plant is required by
20 the NRC to have an annual exercise of
21 emergency plan. The exercise that took
22 place last March 31 was the annual exercise
23 for Davis Besse. Back in 1983, NRC

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1 Region 3 Headquarters personnel
2 participated in that annual exercise. The
3 annual overall exercise performance was
4 successful.

5 In July of 1984, it did not involve
6 a substantial participation by state or
7 county organizations.

8 A number of weaknesses at that time
9 were identified in that exercise and the
10 exercise was considered only marginally
11 acceptable by the NRC.

12 While two weaknesses were
13 identified during the 1985 exercise they
14 were not as basic or as numerous as those
15 in the previous drills.

16 The overall performance of the
17 Davis Besse Emergency Organization has been
18 extremely good during the September, 1986,
19 and the March, 1987 exercise.

20 Both exercise scenarios have been
21 very challenging to the participants.

22 No weaknesses were identified
23 during this year's exercise. A great

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1 number of people in the emergency
2 organization were allowed to demonstrate
3 the capabilities during these two
4 exercises, so based on our evaluations of
5 the last two exercises were allowed to
6 demonstrate what the capabilities during
7 these two exercises.

8 So based on our evaluations, the
9 last two exercises of Davis Besse's
10 Emergency Organizations have proved
11 themselves to be quite capable in
12 responding to a complex and abnormal
13 conditions so that outside officials can
14 take actions to protect health and safety.

15 Besides evaluating the annual
16 exercises since 1983, the NRC has performed
17 annual routine inspections of the emergency
18 preparedness programs of midwest nuclear
19 plants that already have operating
20 licenses.

21 These inspections typically last
22 one week and involve three to five NRC
23 inspectors in unannounced visits.

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1 Routine inspections are a mixture
2 of interviews and record examinations.
3 They include interviews of people who have
4 jobs in the emergency organization. We
5 usually interview people who have not
6 participated in the last exercise.

7 These interviews are conducted to
8 see if the people understand the emergency
9 duties and procedures and also whether they
10 have been given sufficient training and
11 whether they have any complaints or
12 questions on the actual procedures
13 themselves.

14 In our annual inspections we
15 include interviews with at least two teams
16 of control and supervisory personnel to
17 determine whether they can correctly
18 classify an emergency situation; do they
19 understand the requirements of Federal,
20 state and local officials and emergency
21 declarations.

22 Can they make correct protective
23 action decisions with the persons on site

1 and for the members of the public of the
2 emergency plan itself.

3 Besides such interviews we examine
4 records of the various emergency drills
5 that must be conducted each year and
6 determine if all the drills were done and
7 that they proceeded correctly and that
8 corrective actions were taken on problems
9 that were identified.

10 We also determine if all emergency
11 equipment checks and supplies, the
12 inventory was done and any problem was
13 corrected.

14 We tour the plant's emergency
15 response facilities and see that they are
16 ready for use.

17 We check training records to see if
18 members of the emergency organization have
19 passed all the required training in the
20 past year.

21 We confer with the utility's
22 quality assurance department on an annual
23 audit of emergency preparedness program and

1 verify whether they have any problems they
2 have identified.

3 We also examine records associated
4 with all actual emergency planning
5 regulations to determine if those have been
6 properly classified for the situations and
7 if each situation has been adequately
8 reported to county and state officials as
9 well as to the NRC Operations Center.

10 Based on the number and types of
11 findings from the 1984 routine inspection
12 and the 1984 exercise, the NRC management
13 decided that more inspection would be
14 needed in 1985 in the emergency
15 preparedness program.

16 Therefore, instead of the usual two
17 inspections as was planned in 1984, a total
18 of seven inspections of the Davis Besse
19 Emergency Preparedness Program was
20 performed in 1985.

21 The NRC also participated in a
22 number of meetings during 1985 and 1986
23 regarding improvements that were being made

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1 or proposed by the Davis Besse Emergency
2 Preparedness Program.

3 Some of these involved the Toledo
4 Edison staff while others involved members
5 of the Ohio Disaster Services Agency.

6 There was also established an
7 emergency planning zone and the
8 establishment of the forms scheduling
9 state and emergency planning for Davis
10 Besse.

11 The agency also assisted the
12 utility's efforts to assist state and local
13 officials in emergency preparedness
14 training, local school administrators and
15 other employees.

16 In addition to the inspection
17 efforts the NRC staff based in Illinois,
18 resident inspector basically involved in
19 some of the day-to-day activities of the
20 emergency planning group such as observing
21 emergency drilling. They also assist in
22 evaluating the 1986-1987 exercises.

23 In summary, the NRC annual

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1 inspection at first of the Davis Besse
2 Emergency Preparedness consists of
3 evaluation of the utility's performance in
4 annual exercise, comprehensive routine
5 inspection of the program during more and
6 more onsite visits plus an ongoing review
7 of the plant's emergency plan relating to
8 its implementation.

9 Also the resident inspector
10 basically supplements these inspection
11 efforts of the specialist based in Illinois
12 by monitoring some of the daily activities
13 of the plant's emergency planning staff.

14 The Davis Besse Emergency
15 Preparedness Program as defined in 1984,
16 was recommended that additional inspection
17 resources be devoted to reverse this trend.
18 The NRC staff also met with the local state
19 government utility staffs in order to
20 include the onsite and offsite emergency
21 preparedness program.

22 Beginning in 1985, the NRC has
23 seen a steadily and substantial improvement

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1 in the Davis Besse Emergency Preparedness
2 Program.

3 The program now compares favorably
4 with those of other midwestern utilities.

5 However, NRC's annual routine
6 inspection and exercise evaluations of
7 Davis Besse Emergency Preparedness Programs
8 will continue in order to better insure
9 that the program will remain strong.

10 This concludes my presentation.
11 Thank you very much. Thank you for your
12 attention and I will be happy to answer any
13 of your questions as it relates to the
14 Davis Besse Emergency Preparedness Program
15 and our inspection efforts on that program
16 during the question and answer session.

17 MR. BEMENT: Thank you, Tom. I
18 would like to know to introduce you the
19 next speaker which will be Ken Cole from
20 the Ohio Disaster Services Agency.

21 MR. COLE: Good evening. I
22 don't know how many of you here know me but
23 I have been involved with the Ohio Disaster

1 Services Agency for about 20 years and was
2 going over this history of the exercise at
3 Davis Besse and I realize I was here in
4 1979 for that first exercise and actually I
5 was in Columbus and I was embarassed at the
6 way it was performed. I was here at the
7 first public meeting in 1980 and I looked
8 out there and I still recognize about three
9 people that I knew back then so there have
10 been a lot of changing faces or else I'm
11 getting old.

12 The development of the Ohio Plan
13 has been ongoing for a number of years. In
14 fact we started in 1972. It was
15 reemphasized in 1979 and we were involved
16 in the development of the document 0654 and
17 since then we had to go back and redefine a
18 lot of the areas.

19 0654 sets forth the criteria that
20 all plans have to be developed and to
21 follow it as closely as we possibly could.

22 It turned out to be very difficult
23 but it turned out to be very useful.

1 They are over 15 functional areas
2 that we had to address and there were more
3 than just 15 items to look at.

4 If you look at the criteria it
5 breaks down to about 107 different
6 subcategories that you have to look at.

7 The process has been of addressing
8 each of those major criteria and turns out
9 to be a little difficult you might say.

10 If you take one, public information
11 as an example and we have had to go through
12 this, we have had to go through this each
13 time with Lucas County, and they had to
14 identify a spokesperson that should have
15 access to all the necessary information.

16 In order to do that that would be
17 one of the 107 major categories.

18 In order to do that you have to
19 break that down into subparts, a public
20 information officer who should be
21 identified. He has to be identified by
22 position and joint public information has
23 to be supported by a public information

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1 officer, involved in liason, has to be at
2 the hub of activity and in Lucas County he
3 has to be involved with the Lucas County
4 Disaster Services and the Ottawa County
5 Disaster Service Agency. There has to be
6 identified some means of communication for
7 that liason to get information to the joint
8 public information center, provide space
9 for him so there is more than just being
10 one of the 107 categories.

11 In fact we have to go through each
12 of the 107 then if you break them down into
13 subcategories you end up with something
14 like three to five thousand independent
15 actions depending on whether you are
16 talking about one county or two county or
17 three county areas but you will end up from
18 three to five thousand independent actions
19 that have to be looked after in order to
20 properly be involved in the state or local
21 level planning.

22 We at the Ohio Disaster Services
23 Agency in every county in Ohio are

1 associated with nuclear power facilities,
2 have attempted to meet this criteria as best
3 we possibly can and it is our statement
4 that the plans are not perfect, the state
5 plan is not perfect but we feel that it is
6 as good, in a lot of cases better, than any
7 plans in this country.

8
9 The plans and procedures have been
10 tested 12 times since 1979 and have gotten
11 better each time and since 1983, June of
12 1983, there hasn't been a major deficiency
13 applying to the state planning or state
14 actions during that time.

15 Those 12 exercises we have gone
16 through a great deal of testing involving
17 also the Davis Besse facility and we have
18 reviewed the state plan and the county
19 plans we feel we have one of the best in
20 Ohio.

21 This is basically practice for us
22 and for the counties and I think that is
23 probably the biggest reason that there are
so few problems that have come out of these

1 exercises.

2 The last two exercises we were
3 unable to identify any areas of
4 deficiencies. Presently, the state plan
5 submitted to FEMA along with the county
6 plans some time ago and reviewed by
7 Region V FEMA who reviewed the state plan
8 and the county plans.

9 We expect and believe that the
10 Lucas County and Ottawa County plans to be
11 sent to FEMA for the formal review process
12 to be accepted. Thank you very much.

13 MR. BEMENT: Thank you, Ken. The
14 next speaker I will be happy to present to
15 you this evening is Mr. James F. Greer who
16 is Director of the Ottawa County Disaster
17 Services Agency.

18 MR. GREER: The Regional
19 Emergency Response Plan or RERP was written
20 by the Ohio Disaster Services Agency in
21 cooperation with local governmental, civic
22 and private organizations. The plan
23 ensures that an effective organization is

1 established and maintained and uses the
2 resources most needed for an emergency
3 response.

4 The RERP is designed to be
5 comprehensive yet flexible enough to meet
6 the needs of a wide variety of possible
7 conditions.

8 Several facilities have been
9 identified within this document and requires
10 special consideration relating to emergency
11 planning.

12 Some of these facilities include
13 health care facilities, schools and jails.

14 Approximately 100 standard
15 operating procedures or SOP's have been
16 written to provide detailed instructions on
17 performing tasks specified within the plan.

18 The SOP's were designed and
19 developed in conjunction with the
20 appropriate agencies.

21 The Ottawa County Plan Emergency
22 Response Organization was tested as part of
23 full scale exercises in 1979, 1980, 1983,

1 1985 and 1987.

2 The Federal Emergency Management
3 Agency has concluded that emergency
4 preparedness in Ottawa County is adequate
5 to assure that appropriate measures can be
6 taken to protect the health and safety of
7 the public living in the vicinity of the
8 Davis Besse Nuclear Power Station in the
9 event of radiological emergency.

10 Although plans and procedures have
11 proven to be effective, they are
12 continually reviewed, updated and improved
13 where appropriate. Thank you very much.

14 MR. BEMENT: Thank you, Jim. The
15 next speaker this evening is Mr. Don
16 Hickey, from the Lucas County Disaster
17 Services Agency.

18 MR. HICKEY: I am glad to be here
19 for this meeting. I am going to take a
20 different tack as far as concern to you
21 all. I am sure that you are aware of all
22 the rules and regulations that we all must
23 follow and that kind of reminds me of an

1 old neighbor that I had. He went to
2 church and was stone deaf. He went to
3 church every Sunday. Couldn't hear the
4 sermon, couldn't hear the choir and he
5 couldn't hear the music or the organ.

6 One day a neighbor asked him why he
7 continued going to church every Sunday and
8 the reason was he said that I want my
9 neighbors to know whose side I'm on.

10 So too with Lucas County, and I
11 probably speak for the State of Ohio and
12 for Ottawa County and all those involved in
13 the Toledo Edison; we have chosen sides and
14 you, the people of this area, we are on
15 your side.

16 Why else would we have spent over
17 4000 hours in the last year in training,
18 training over 400 people.

19 I think the involvement, even
20 though in the beginning we could contribute
21 very little, but throughout the County of
22 Lucas, we were aided by all the various
23 agencies that had the opportunity to give us

1 their support to try and develop this plan.

2 I again want to say thank you.

3 What I do want to say about the plan is
4 this, of this plan, not only insofar as
5 nuclear is concerned, but I think it is
6 subject to any disasters of any kind. It,
7 of course, is a subject that none of us
8 really care to dwell on; earthquakes, fires,
9 assassinations, terrorist attacks, nuclear
10 meltdowns and so forth.

11 We want it under control and have
12 plans and we want to keep it that way. The
13 result of this out of sight out of mind
14 attitude, our society is often ill equipped
15 to deal with the emergencies when they
16 arise.

17 Disasters can include almost any
18 combination of hazards to life and property
19 and it may even extend to evacuating a
20 neighborhood or even a town.

21 There may be a need for temporary
22 housing or emergency food supply. It might
23 mean significant damage to the environment.

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1 The job of local civil defense
2 agencies is to mitigate the loss of life
3 and property in the event of a natural or
4 man made whether biological, chemical or
5 other disaster.

6 It may include chemical spills,
7 power outages, floods, explosions, ice
8 storms, fire, you name it, we are there.

9 We respond to the situations
10 through planning. At any level the
11 government's capacity to respond to
12 emergency and to give assistance depending
13 directly upon the ability of the number of
14 organizations at large and individuals and
15 jurisdictions to act effectively and
16 quickly in emergency situations.

17 The obligations to respond to
18 emergency lies with local government.
19 Resources from local jurisdictions are
20 closest at hand and can be almost
21 immediately available.

22 Therefore, I would like to take
23 this opportunity to thank all those people

1 who made up the organizations that
2 developed the Lucas County Disaster Plan as
3 they pertain to the Davis Besse Nuclear
4 Power Station.

5 As has been stated, a diamond is
6 just a chunk of coal that has been made
7 good under pressure. It is my belief with
8 all the help and assistance given by all
9 the various groups involved, the plan which
10 is written, explained, and now demonstrated
11 resulted in exceptional results. I want to
12 repeat something that was in the paper and
13 also on the media. The fact that in
14 Pennsylvania not too long ago some 16,000
15 people were evacuated without incident due
16 to a hazardous toxic fume accident.

17 When the officials were asked how
18 they accomplished this in such a timely
19 fashion they responded that they had a
20 nuclear power station nearby and in
21 conjunction with them they had developed a
22 plan and an emergency response just in case
23 there was an accident.

1 Not only had they developed a plan
2 but they had exercised a plan in scenario
3 form. Again, in conjunction with the power
4 station.

5 So too, we in Lucas County have
6 developed an emergency response plan in
7 concert with the Nucelar Power Station.

8 This plan was tested on March 31,
9 1987 in a worse case scenario involving
10 several governmental agencies, county and
11 state and Federal.

12 The credit and success for this
13 exercise must go to all the various
14 agencies of Lucas County, that is the
15 Commissioners, Jerusalem Township
16 Trustees, the Jerusalem Township Fire and
17 Police Department, the Oregon Fire and
18 Police Department, County Sheriff, the
19 county schools, the Lucas County Engineer,
20 the Red Cross, Salvation Army and many,
21 many more volunteers.

22 Lastly I would like to thank Toledo
23 Edison for their time and efforts spent in

1 developing of a radiological plan.

2 Without their moral, physical and
3 monetary support, this could not have been
4 accomplished in a time span of less than a
5 year.

6 Furthermore, the plans formed the
7 basis for the development of a
8 comprehensive population protection plan
9 that would deal with all disaster
10 emergencies, natural and manmade.

11 We can deal effectively with a
12 nuclear accident and we can deal of course
13 with any emergency.

14 When I first was appointed Director
15 I went to the Civil Defense Office. I
16 often said that the problem was that they
17 were dedicated people there but no one paid
18 any attention to them and didn't have the
19 equipment or the capabilities of really
20 responding to the various disasters of
21 being able to coordinate various agencies.

22 Someone said, we have a carrier
23 pigeon and one radio for communication.

1 But that has changed. We have
2 developed a plan that encompasses all the
3 governmental agencies, all the various
4 individuals in the county and in the test
5 on the 31st we had over 40 people in the
6 emergency operation center and we were able
7 to cope with all of the various problems
8 that arose during that scenario and it is
9 difficult to follow these gentlemen because
10 they have given you all the basic
11 individual things that must be accomplished
12 for us to be able to have a plan and to be
13 able to have that plan approved by FEMA and
14 by the NRC. Thank you very much.

15 MR. BEMENT: Thank you very much,
16 Mr. Hickey. Our next speaker will be Don
17 Shelton, who is the Vice President, Nuclear
18 Davis Besse Nuclear Power Station.

19 MR. SHELTON: Good evening, I would
20 just like to restate Toledo Edison's
21 unqualified commitment to the preservation
22 of the health and safety of the general
23 public through the emergency preparedness

1 program that we manage.

2 Those programs involve two
3 fundamental thesis; one is onsite program
4 in which we maintain facilities and
5 equipment and secondly an extensive
6 training program of our emergency program
7 personnel.

8 Those facilities and people are
9 tested annually as well as being tested by
10 the Nuclear Regulatory Commission.

11 Offsite, we have full time staff
12 members assigned to Ottawa and Lucas County
13 and on a part time basis too, Sandusky and
14 Erie County. The purpose of these people
15 is to work with the organizations on a
16 day-to-day basis the county people so that
17 we can respond to their needs for equipment
18 and facilities and training.

19 In the last two years we have
20 helped in the construction of the Lucas
21 County Emergency Operating Center and
22 upgrade the Ottawa County Emergency
23 Operating Center. Major upgrading of the

1 siren system to the tune of several million
2 dollars.

3 The effectiveness of those efforts
4 have been demonstrated in the most recent
5 exercise.

6 Several people have noted in th'
7 program last night the Chairman of the
8 Public Utilities Commission, a member of
9 the Governor's ERT, at a public meeting in Oak
10 Harbor, noted the excellence of our
11 emergency preparedness programs and that
12 was manifested by the efforts which they
13 demonstrated in the regional exercises and
14 further stated that one of the purposes of
15 the ERT was to take that plan and help
16 build on it and see that the
17 recommendations coming out of that team was
18 oriented as their own efforts are to
19 continually improve the product and so we
20 fully want to take that approach.

21 Thank you.

22 MR. BEMENT: Thank you, Don. This
23 concludes the formal portion of the

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1 exercise and presentations to be made.

2 I would think at this time we would
3 be ready to hear from members of the
4 public.

5 This then begins the informal
6 portion for public statements and we have
7 two forms that have been filled out. The
8 first one is by this individual who would
9 like to make a public statement.

10 Will you please use the microphone
11 and give your name and address and make
12 your statement.

13 MS. SCHOOP: My name is Dianna
14 Schoop and I live at 2355 Hempstead Road in
15 Toledo and I have one note I want to show
16 you. It has to do with notifications to
17 the public. You did mention that that was
18 one of the requirements of notification to
19 the public and I believe you, but I feel
20 that our media did not carry out that task
21 well. I want to show you a copy of the
22 notification we had in the Blade concerning
23 this meeting.

1 This is a newspaper article that
2 was this large and it was only last night
3 in the Blade. I don't know how papers
4 handle this here but that is no way to
5 notify the public. They were informed two
6 weeks ago then I feel that public officials
7 need to have some kind of confirmation
8 from you and you need to have confirmation
9 from the media that the message is getting
10 out to the public.

11 I would like to keep this but I
12 would like all of you to keep it. I would
13 like you all to look at it and see how
14 ridiculous it is. This is just one day's
15 time.

16 MR. BEMENT: Does that complete
17 your statement?

18 MS. SCHOOP: No. Mr. Shelton also
19 mentioned about the meeting last night in
20 Oak Harbor and I would like to point out
21 that I spoke to the people again today
22 concerning notification, on the same
23 subject, lack of notification. There

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1 might have been a legal notice but I don't
2 where it was in the paper and if there was
3 a legal notice I doubt if any of the public
4 actually reads the legal notices.

5 Maybe you have met or someone has
6 met the legal requirements but it does not
7 bring out the public and it certainly
8 didn't last night. I think if it doesn't
9 bring out the public, then these hearings
10 are a sham.

11 Furthermore, I am going to talk
12 really about the drills and my feelings as
13 a person.

14 If there was such a drill and
15 assumming someone does have a heart attack,
16 I am wondering what would happened if this
17 happened in a real emergency where it is
18 much more likely to have someone have a
19 heart attack which again there would be a
20 delay in the emergency evacuation plan. At
21 the time the drill was held the weather was
22 not very favorable. If you had been there,
23 if it had not been a drill but been an

1 actual emergency, I don't know how you
2 would have carried out your plans.

3 I noticed in the paper and it was
4 not in the Blade but it was in the local
5 papers here, that certain of the crews
6 could not participate, road crews could not
7 participate in the drill because they were
8 out plowing the snow.

9 Now, if you have most of your crews
10 clearing the snow in a snow emergency how
11 would you again be able to control traffic.

12 You mentioned the upgrading of the
13 plans. I don't know how they were
14 upgraded but I know that some of the
15 residents in the area close to the plant
16 who live very close to the siren say they
17 cannot hear it when there's a washing
18 machine going at the same time and the
19 house is closed.

20 Some of the people are hard to hear
21 and of course a siren also is harder to
22 hear when the snow is falling and it has
23 been recommended in the Eastern part of the

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1 country that you upgrade your siren system
2 and I hope that you do take that into
3 consideration here that the sirens should
4 also be heard when there is a snow storm.

5 During your drill, Toledo Edison
6 did not have the contract workers, the
7 constructions workers report to them and I
8 find that very strange because if there was
9 to be a nuclear emergency then you are
10 going to have to evacuate most likely
11 everyone in the plant that is not needed
12 and that would not include contractor
13 workers and I think that is terrible.

14 I also have another concern and
15 that is the fact that there was such a
16 delay of five years it looks like in
17 setting up the emergency evaluation plan
18 for Lucas County and I think there is no
19 excuse for that. To have such a time lag
20 there is no excuse. I think there is no
21 excuse that people in this county are not
22 protected or were not for such a period of
23 time.

1 Closer to the evacuation center is
2 another one of my concerns. Chernobyl has
3 taught us that if there were to be a major
4 accident with the release of radiation,
5 that 10 miles, just outside the 10-mile
6 zone is too close. They evacuated everyone
7 within 19 miles. Magruder Hospital which
8 is one of the evacuation treatment centers
9 is just one mile outside the 10-mile zone
10 and often times winds are blowing from the
11 direction of the west and southwest, so
12 here you have an emergency evacuation
13 hospital but how can you protect people in
14 a hospital facility so close.

15 I entered a home of someone in the
16 area who is handicapped. Last night
17 someone did attend the meeting of Oak
18 Harbor and they said that they will upgrade
19 the handicapped person and they will be on
20 the computer. This man is heavy. I asked
21 him how many people would it take to move
22 him and he says, between two and four
23 people. He was sure that he could get out.

1 car.

2 I also want to know if this
3 Commission has thought in terms of an
4 evacuation plan. You may have met all your
5 requirements but at Chernobyl they found
6 that evacuated people were under the plume
7 at the time affected as well. Have you
8 thought of that in your evacuation plan?

9 If there is this radioactive cloud
10 overhead are we better off perhaps to try
11 and stay inside the house and get more
12 protection there. There is more protection
13 in a brick house than a wood house. Have
14 we thought of that in making your
15 evacuation plans and have you included
16 that, to protect the people more from a
17 plume passing over them. As far as I know
18 that has not been considered and I really
19 feel to protect the people that should be
20 considered.

21 I also do not find a statement with
22 regard to an escape route from Toledo and
23 even though that is 21 miles I'm not sure

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1 that if the winds are going towards Toledo
2 that I would be protected, especially if
3 the weather would be raining the plume may
4 be headed at Toledo and I feel that the
5 evacuation plan should include Toledo and I
6 am talking about radiation evacuation plan,
7 not the evacuation plan that is already in
8 existence. Because that's where most of
9 the people live close to the plant. Thank
10 you. I appreciate your time.

11 MR. BEMENT: Thank you. Any of
12 you gentleman wish to comment on this?

13 MR. COLE: Yes. I will comment
14 on at least one of the comments that were
15 made. We have thought about shelters for
16 evacuation and it is a process of
17 calculations that we do go through and we
18 demonstrate that in every exercise that is
19 covered in the area of assessment and that
20 is to determine whether or not before our
21 stay inside the house would substantially
22 reduce the exposure, so it is taken into
23 account based on four hours for a turn over

1 in the air from the outside to the inside
2 and if the calculations come out that a
3 lower total exposure would be received by a
4 shelter, then that is the state's
5 recommendation, to stay inside the shelter.

6 It is not spelled out specifically
7 in the planning but we have already
8 considered that and that is part of our
9 procedure.

10 MR. PLOSKI: I would like to
11 comment about evacuation exercise. The NRC
12 requires that once a year the utility holds
13 a drill to demonstrate that they can
14 assemble and account for all the people
15 inside the facility considered the
16 effective area in about 30 minutes.

17 During the exercising question,
18 March 31st, that demonstration involved
19 somewhere between 5 and 600 people.

20 It was not a requirement by the NRC
21 that such a demonstration be done during
22 the annual exercise; it could be done
23 anytime, even on a weekend, but we were

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1 satisfied that the drill went along quite
2 well involved that many people.

3 If we have a plant that is applying
4 for an operating license, we require
5 several thousand people to be involved and
6 5 or 600 will be representative which would
7 be normal to be there at any one time when
8 of course during a normal operating plant
9 there would not be a lot of construction
10 activity going on in the plant.

11 MS. SCHOOP: Just one question in
12 response to that. It was mentioned in the
13 paper again, there was a woman who had
14 called the paper to mention that she was
15 not at work that day and would not know
16 what to do if there were to be an
17 evacuation and I feel even if it is not a
18 requirement that Toledo Edison should make
19 sure that all the personnel, not the 5 or
20 600, but all their personnel at the plant
21 are familiar with the evacuation
22 procedures.

23 MR. PLOSKI: Just a little more

1 information that the resident inspectors
2 are involved in monitoring the plant
3 activities related to emergency
4 preparedness and several weeks before the
5 exercise they mailed me a copy of a
6 newsletter that was distributed to plant
7 employees whether it caught everybody, I
8 don't know, but basically the newsletter
9 had attached to it drawings of the
10 different floors or different plant
11 buildings to show where the nearest
12 assembly areas were and it explained how
13 people should respond if they were told to
14 evacuate the plant promptly.

15 They were also sent copies of the
16 evacuation procedures prior to the
17 demonstrations.

18 Now, whether everyone was involved
19 in those or not, I don't know.

20 Also during the exercise one of the
21 demonstrations was that one person at the
22 plant was told not to report to their
23 assembly area, to go hide in the plant,

1 basically just not show up where he or she
2 was expected to show.

3 That person was found within 10 or
4 15 minutes and a second person was also
5 instructed not to appear and that person
6 was found within 15 minutes also.

7 So assumming people will talk to
8 each other we feel that if someone doesn't
9 know where they should go and ask someone
10 and that person will get help.

11 Also, there are certain procedures
12 developed for the people in the plant so
13 that a search and rescue team of several
14 people will go out and look for persons in
15 the plant using plant security systems. By
16 this system these people can tell where
17 that person was last seen and whether they
18 have access to certain plant areas.

19 We don't say that any plan is 100
20 percent fool proof, but we think plans have
21 been made and demonstrated that have shown
22 this type of plan is quite successful.

23 People do talk to each other. If

1 someone doesn't get the word or if someone
2 is not familiar with where they should go
3 because they are a visitor in the plant or
4 an employee, with the help of the group
5 there will be enough assistance to help
6 them get to the right location .

7 MR. BEMENT: Don, did you have
8 something you wanted to state?

9 MR. SHELTON: Yes. I would like to
10 help you if I could in the sense you asked
11 a number of questions, did we think about
12 flooding, evacuation and various protection
13 and decisions and evacuation versus
14 sheltering and based on, and I am sure in
15 the interest of economy at the time you
16 didn't share all the questions you might
17 have with us and that could be raised, but
18 I think I have a glimmer that you were not,
19 you do not have the opportunity to be
20 familiar with the telephone books' words of
21 procedure and rationale that we have for
22 doing this. And any one of these agencies,
23 including Toledo Edison would be happy to

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1 make those available because those would
2 answer most of the questions that you
3 haven't asked plus all the ones that you
4 did.

5 MS. SCHOOP: Is that available to
6 the public, the information that you just
7 talked about, the books and other
8 information, is that available to the
9 public or not?

10 MR. HICKEY: The Toledo Lucas
11 County Plans are available in the main
12 library in Toledo.

13 MR. GREER: The State of Ohio and
14 the Ottawa County Plans are also public
15 documents and available at the University
16 of Toledo and at the Public Library in
17 Toledo.

18 MS. SCHOOP: One more question. I
19 don't know if too many people here have
20 signed up to speak. I was just wondering
21 if from the audience here how many people
22 got notice longer than we did through the
23 Blade and I am not talking about Toledo

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1 Edison employees that would have inside
2 knowledge and know about this hearing but I
3 am just asking if anyone else had a short
4 notice as I did.

5 Anybody here raise your hand if you
6 knew about this more than a few days ago or
7 would not have found out any other way.

8 MR. BEMENT: Instead of doing
9 that, why don't we have the State of Ohio
10 make comments as to how they made the
11 notice available and the procedures that
12 they used. I think that would be helpful.

13 MR. ~~GREER~~ ^{Cole}: Thank you. We are
14 required to put the notice in the paper and
15 I'm not sure of the details totally of
16 this.

17 We put it in the paper with the
18 largest circulation in the area two weeks
19 prior to the public meeting and then one
20 week prior to the meeting.

21 It appears to be in the public
22 notice and we have to show proof of the
23 fact that it did appear.

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1 It appeared in the Ottawa News
2 Herald, Ottawa Peninsula News and the
3 Ottawa County Exponent, the Toledo Blade,
4 the Toledo Journal. Follow-up calls are
5 made and I am sure it did get into the
6 paper.

7 We supply FEMA with a copy of the
8 papers where that notice appears. We
9 obviously don't have any control whether
10 the news departments or news media pick it
11 up and put it somewhere else in the paper
12 but we do make an attempt to get the
13 information out.

14 MS. SCHOOP: Can I make that
15 recommendation to you. From now on, any
16 time there is going to be a hearing of this
17 kind, that just a public notice alone is
18 not enough -- until now I really realized
19 that it was in there. I had not reason t
20 scan public notices. I would like from now
21 on to recommend to make sure that it is
22 expanded coverage in the paper.

23 MR. COLE: Well, let me share

1 with you a press release from the Ohio
2 Disaster Services Agency and again, when we
3 make this presentation and send this off to
4 the media, these press releases, we
5 have no way of forcing anybody from the
6 Toledo Blade to put it into section a, or b
7 or c or anywhere. They don't have to print
8 it at all or even air it over the radio but
9 on April the 20th we had an immediate press
10 release of public meeting of the Davis
11 Besse for today and et cetera. That was
12 all listed in this press release for
13 7 p.m., April 30, 1987 here at Eisenhower
14 Junior High School.

15 It goes into detail about the
16 officials who will be there, the Ottawa
17 County and Lucas County and NRC officials
18 FEMA people and members of the public who
19 wish to view the emergency response plans
20 may do so by appointment at the Ottawa
21 County Disaster Services Agency and the
22 Lucas County Civil Defense, Ohio Disaster
23 Services Agency and also the Public

1 Document Reading Room at the Toledo Lucas
2 County Public Library:

3 If we had some way of controlling I
4 suppose we could force them to put it into
5 the paper but this is the way news release
6 are made.

7 MS SCHOOP: Could I ask this
8 question? How is it in other cities? Do
9 you find more people coming to hearings in
10 other cities and how does the media in
11 general respond to that?

12 MR. PLOSKI: Ever since Chernobyl
13 many people attended public meetings
14 following the exercises somewhat and it
15 drew more media attention.

16 However, typically we had utility
17 employees, county employees who tended to
18 outnumber the members of the general
19 public.

20 Following the exercise in 1987 when
21 we did have a public hearing at one of the
22 facilities, we only had one member of the
23 public show up at the public meeting. I

1 don't know why. I expected more people to
2 attend but there just was not a lot of
3 public interest. I don't know the reason
4 why not.

5 My experience has been with FEMA
6 after the Three-Mile situation occurred
7 there was a lot of public attention, a lot
8 of public officials and then less and less
9 each year would attend and in all honesty,
10 pitifully few members of the public have
11 showed up although a lot of the local
12 officials and utility will show up.

13 As far as the publication process
14 is concerned, FEMA has recognized that
15 these announcements must be made and have
16 done so according to the legal requirements
17 of course and have made these public
18 meetings and there has been the release of
19 these news releases so an honest attempt
20 has been made to inform the public of these
21 meetings to give them as much information
22 as we can.

23 MS. SCHOOP: Thank you very much.

1 MR. BEMENT: We have another form
2 here. Mr. Mike Ferner and would you like
3 to come up here Mr. Ferner and make your
4 statement.

5 MR. FERNER: My name is Mike
6 Ferner, F-e-r-n-e-r. My address is 2975
7 113th Street, Toledo, Ohio.

8 I am here as representative of the
9 American Federation of State, County and
10 Municipal Employees, the largest AFL-CIO
11 Union and we represent all types of
12 government public employees throughout the
13 country, as well as some 25,000
14 non-teaching public school employees in the
15 State of Ohio and I would like to point out
16 and have put in the record something that
17 may not be new to the people on the podium
18 here, at least it has been in documents
19 passed back and forth between FEMA and the
20 NRC utility, but I just want to point out
21 that for evacuation plans to work obviously
22 there has to be people that are going to be
23 willing to participate in the evacuation

1 plan.

2 It appears from what I know of the
3 sentiment of the school employees that are
4 going to have to be involved, that there is
5 a very large deficiency in the plan, in
6 that in the event of a serious accident at
7 Davis Besse, that in those plans for
8 evacuation the general public may be in for
9 a very rude and very dangerous surprise.

10 I have a letter from the NRC dated
11 November 19 to the attorney for the
12 Coalition for Safe Energy, one of the
13 interveners in the plan and it states on
14 Page 12, "regardless of how the union
15 employees have felt, in FEMA's view union
16 members are willing to cooperate, attend
17 meetings and participate in training
18 related to their emergency duties."

19 Again, in a response from the
20 utility's attorneys, they talk about
21 emergency worker response and they go into
22 a little more detail when they say,
23 "However, subject of human response," and

1 he is talking about the fact that the
2 employees, some of the employees have
3 decided that they do not want to
4 participate he says, "The subject of human
5 response to an emergency is one of the
6 most litigated issues of NRC licensing
7 hearings. NRC case law recognizes that an
8 actual emergency where people perform to
9 social behavior patterns and assume their
10 roles. Under the emergency plans even when
11 they have earlier stated that they would
12 not do so."

13 Then he goes on to cite Civic Gas
14 and Electric, Canyon Gas and Electric, and
15 Consolidated Edison at Indian Point as
16 examples of why this is the case and to my
17 knowledge there has never been a full scale
18 emergency evacuation of either of those
19 plants.

20 It also goes on to say that there
21 is a record of national emergency response
22 in thousands of natural and technological
23 disasters that it has been demonstrated

1 that the emergency workers are paid and
2 volunteer to perform their functions.
3 Emergency workers can be expected to
4 perform their emergency functions
5 regardless of conflicting demands.

6 Again I think that as the people
7 involved in this evacuation is going to be
8 in for a rude awakening. If school
9 employees are ever called on to participate
10 -- the Port Clinton City Schools, one of
11 the largest school districts if not the
12 largest one in Ottawa County involved in
13 this plan, to my knowledge has zero
14 classified school employees volunteering to
15 participate.

16 There are other school districts
17 involved and their level of participation
18 is not much any better at any of them.

19 Now, the FEMA and NRC utility
20 companies and service agencies may continue
21 as if these people will in fact participate
22 based on the responses but I think that is
23 a pretty shaky ground they are standing on

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1 and I don't really expect that this will
2 change any of the regulatory agency's minds
3 as far as whether the plans will continue
4 to operate or not. I just wanted to place
5 into the record my concern.

6 I also want to state that the
7 American Federation of Federal, State and
8 Local Employees at its international
9 convention last year in June took the
10 position that -- that the convention with a
11 couple thousand members and delegates took
12 the position that nuclear power should be
13 phased out as soon as possible I think with
14 the experience of school districts in this
15 area, I think Davis Besse may be first on
16 the list to experience a little bit more in
17 the way of activity by union members to try
18 to put that resolution into effect.

19 You talk about a 10-mile radius, a
20 10-mile zone around the plant. I think
21 that is the largest deficiency of all. I
22 realize that is part of the ground rules of
23 the game that has been set up as far as

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1 what you talk about whether it is
2 sufficient or not and you are supposed to
3 fall within that, but when people in
4 Britain had to have the consumption of milk
5 and meat curtailed following Chernobyl and
6 when they have seen again rising in the
7 level of radiation in the spring following
8 the hay that was mowed last fall being fed
9 to the livestock again, and the radiation
10 has gone to unacceptable levels and
11 continues to do so because the half life of
12 Cesium is 30 years, if we talk about a
13 10-mile zone around the plant is foolish at
14 best.

15 I realize that is the regulation
16 that you are stuck with in planning but my
17 point is that, very simply, just because
18 that is what the Federal Government has
19 said in the regulations, by no means means
20 that is adequate. Thank you very much for
21 your time.

22 MR. BEMENT: Some others. Anyone
23 wish to respond?

1 MR. SHELTON. I would just like to
2 make sure we set the record straight on one
3 point with respect to Port Clinton bus
4 drivers and I am glad you qualified your
5 statement by saying, to my knowledge,
6 because it is either disingenuous or the
7 fact is your knowledge is flawed or you are
8 dead wrong; in fact the vast majority of
9 those people have acknowledged formally
10 that they will participate and essentially
11 all of them have accepted the training.

12 MR. FERNER: They may have
13 accepted the training but I was informed by
14 the President of that union that they have
15 got no volunteers.

16 MR. GREER: Point of
17 clarification. We have trained 190 bus
18 drivers in Ottawa County. We sent
19 questioners to the bus drivers giving them
20 the option of identifying whether they
21 would assist with the evacuation of school
22 children only and whether they would assist
23 with the evacuation of school children as

1 they got the school children out if they
2 would come in and help out with the general
3 public or they would not assist at all.

4 We got 94 responses to the
5 questioner. 48 individuals identified that
6 they would not only assist in evacuating
7 the school but also would come back and
8 assist the emergency workers, 37 identified
9 that they would assist with the school
10 children but they would not be emergency
11 workers.

12 We have enough letters of agreement
13 with the individual bus drivers in Ottawa
14 County to evacuate all the schools in
15 Ottawa County in one trip and to certainly
16 carry out the emergency response plan for
17 the general public. These letters are on
18 file with the Superintendents of the
19 individual school districts. You can check
20 with them and they will give you the
21 numbers. They would not identify the
22 specific bus drivers because that would be
23 confidential. I doubt that the

1 superintendents will give you the names but
2 I am sure they will back up numbers.

3 MR. FERNER: I don't know. There
4 must be a fly in somebody's ointment
5 because I have also seen a letter from a
6 school principal in the Benton-Carroll
7 school district at Oak Harbor that was sent
8 home to the students and the parents asking
9 the parents to give permission to their
10 son or daughter to drive their private car
11 in the event of an accident at Davis Besse
12 because there wasn't enough buses to take
13 care of everyone.

14 MR. SHELTON: Yes; as a precaution
15 the letter was sent out, that is true.

16 MR. FERNER: Thank you for that
17 information and I will indeed check up on
18 it.

19 MR. SHELTON: There is one more
20 point of clarification. I believe the
21 person that seconded the motion at the
22 union convention to not participate in the
23 emergency planning is in fact one of our

1 volunteers today.

2 MR. FERNER: I will check that all
3 out. Thank you.

4 MR. COLE: I would like to make
5 a comment. This doesn't have anything to
6 do with this area here but it has a lot to
7 do with bus drivers and has to do with the
8 first ERT public meeting held over at the
9 Perry Plant last fall I believe. The
10 subject of bus drivers and bus drivers not
11 volunteering came up at that meeting and we
12 have records to show that in that
13 particular area at the Perry Plant which
14 involves a three county area around that
15 plant we have trained 800 drivers. There
16 is a requirement for 290. Out of that 800
17 drivers that that public meeting held by
18 the ERT four drivers said that they
19 would refuse to participate. I think that
20 is some sort of an indication that there is
21 not a large number of drivers that would
22 not participate.

23 In fact in this area because I was

1 one of the individuals that participated in
2 training bus drivers in Lucas County, in
3 fact I think it is quite the opposite is
4 true. The bus drivers did indicate their
5 willingness to participate. They were
6 interested in the training, asked
7 questions, wanted to know what they were
8 supposed to do and at the end of the
9 training class we had a pass out like a
10 course critique and a questionnaire and it
11 wasn't asking for volunteers, just asking
12 for their feelings and I don't remember the
13 statistics, but I don't think we found
14 any more than two or three that felt
15 worried about participating.

16 In fact I think that was true in
17 the Ottawa County training as well and all
18 indications that I got were very positive.

19 MR. FERNER: I think there may be
20 a difference between the number of people
21 trained and the numbers that will
22 volunteer. Could you give me the citations
23 for those documents that you are referring

1 we went over all the aspects of the
2 training and at the end of the conversation
3 he was positive about the training.

4 He didn't see where he could find
5 any problem with the type of training or
6 the quantity of training or the details of
7 the training. I don't have that in writing
8 from him but that was his indication.

9 Now, as a result of ERT which is
10 part of the process of bringing about the
11 training in the first place, we will be
12 going back to Mr. Kitchen at another
13 meeting to describe for him the resolution
14 of the bus drivers which is basically going
15 to be the same thing we discussed before to
16 get his feelings once again.

17 MR. FERNER: Well, I think it is
18 going to make for an interesting continuing
19 debate because I think this issue is going
20 to be raised in more than one forum in the
21 future.

22 MR. BEMENT: We have one more
23 public statement that someone wishes to

1 make. Please come forward, Mr. Mark
2 Anderson.

3 MR. ANDERSON: Thank you. My name
4 is Mark Anderson and I reside at 2467
5 Caledonia Street in Toledo, Ohio and I am
6 President of the Ohio State Association of
7 Public School Employees, Chapter 320 which
8 represents the Oregon School District.

9 I know most of you are aware of the
10 fact that the resolution was passed by the
11 Northwest District that we would not
12 participate in a nuclear -- any planning or
13 the actual evacuation in the event of a
14 disaster.

15 I was the one who brought that
16 resolution on the floor and if you want to
17 know, I am the one who brought it on the
18 floor. Our union has some problems with
19 this. They are people who to my knowledge
20 have not volunteered. We have no
21 volunteers in the Oregon School system to
22 work with the evacuation and people that
23 did go to the training do not feel that it

1 was totally adequate. They don't feel that
2 a three-hour program is enough really
3 training for these people so they know what
4 they might have to encounter in the event
5 of nuclear disaster.

6 That is about the end of my
7 statement. I have some questions also.

8 My first question being, on the
9 drill on March 31st which Eisenhower Junior
10 High School was part of here, are you aware
11 that at the time of that drill there was
12 not anyone here that had been through any
13 training for his position in this building
14 and the person that was here was a
15 substitute custodian who had no idea that
16 that was even going to happen.

17 What would you do if we did have a
18 problem tomorrow at Davis Besse and the
19 custodian who knows and operates this
20 building was not here and a substitute who
21 knows nothing about the building was here.
22 How would you deal with that?

23 MR. HICKEY: I am sure that --

1 where do you get your custodians from. If
2 they can't operate the building wouldn't
3 the building be in a hazardous situation
4 for the students that were here. Whether
5 there was an accident or not you would not
6 bring in a custodian who doesn't know how
7 to operate the building; would you?

8 MR. ANDERSON: In the question of
9 this building here the fireman-custodian
10 who runs the boilers in this building, if
11 he is not here they bring a boiler operator
12 who works in our maintenance department to
13 fire the boilers which means that he is not
14 a custodian and performs no custodial
15 tasks. All he does is operate the boilers
16 and doesn't know a heck of a lot about this
17 building.

18 MR. HICKEY: And doesn't that
19 concern you?

20 MR. ANDERSON: It sure does concern
21 me.

22 MR. HICKEY: I think that those
23 individuals, our understanding is that they

1 do have the training. That is possible
2 probably in any walk of life as far as -- I
3 don't understand. The boilers are not the
4 only thing that operates in this building
5 and it would be difficult for me to believe
6 that the individual that you bring in is
7 not going to be knowledgeable about the
8 workings of the entire building.

9 I think that is your responsibility
10 to make sure that he has that knowledge and
11 ability.

12 MR. ANDERSON: That is not my
13 responsibility. That is the responsibility
14 of the Oregon Board of Education and the
15 Oregon Board of Education has also
16 contributed our services without the
17 approval of the labor organization out
18 here.

19 My second question is --

20 MR. HICKEY: Let me just interject
21 something here. A respond to the first
22 question. There was an evaluation that was
23 made to evaluate the school participation

1 in the exercise in terms of all these
2 schools were being used in terms of the
3 demonstration. Interviews were made of
4 the bus drivers in the evaluation of the
5 demonstration at that point in the draft
6 report.

7 MR. ANDERSON: And my second
8 question is, how many volunteers do we
9 have, do you have from the Oregon School
10 District, bus drivers, custodians, cooks,
11 everything?

12 MR. HICKEY: Do you have numbers,
13 Harold?

14 A VOICE: No, I don't have
15 numbers but in the limited exercises that
16 we do have, all the bus drivers reported
17 and the concern he was referring to about
18 the custodian, was the principal to get
19 into the building. We have trained persons
20 from Human Services, from Salvation Army
21 that conducted the monitoring, the
22 Volunteer Fire Department conducted the
23 monitoring that those people are trained.

1 We do not train custodial persons from
2 school. We have no requirement for them.
3 If the union has a requirement for them
4 through the school contract that is
5 something that is not a concern of ours.

6 We made out letters of
7 understanding with the Superintendent of
8 Schools, the School Business Administrator
9 and the Principal of this facility.

10 MR. ANDERSON: My question is, if
11 there is no need for custodial personnel,
12 if there is no need for kitchen personnel
13 why are they required in the disaster
14 services evacuation plan.

15 MR. COLE: I think we know each
16 other. You are the same school with the
17 same group that I was with the night I
18 taught the course. You didn't stay for the
19 training; is that right?

20 MR. ANDERSON: That's right.

21 MR. COLE: In fact that was a
22 class that I was offering to all the
23 students indicated that they have nothing

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1 but positive remarks.

2 It was stated at least in the
3 classes that I had attended the fact that
4 the meetings that Mr. DeMason and I
5 attended, to explain the training we told
6 those in attendance -- you were at that
7 meeting -- that the custodians and the food
8 service personnel, although they weren't
9 required to attend the class they could if
10 they wanted to if they had some concerns.

11 The target audience was the bus
12 drivers but no one was refused. Even
13 though they didn't have a function under
14 the plan, even though they signed that
15 piece of paper that it would be
16 acknowledging they had attended the class
17 and I don't know what else signing admits,
18 but --

19 MR. ANDRESON: Didn't mean anything
20 else other than they attended the classes.

21 MR. COLE: They knew, going into
22 it or at least their supervisors knew and I
23 don't know exactly who was at the meeting

1 but I know their supervisors were at the
2 meeting and you were at the meeting that
3 they weren't required to but the meeting
4 was open to them and the training was open
5 to them if they wanted it and a lot of them
6 did attend.

7 MR. ANDERSON: Since that meeting a
8 lot of them have felt that the training
9 program presented to us was less than
10 adequate.

11 MR. COLE: Mark, how could that
12 be when Mr. Kitchen has said that it was
13 adequate, you indicated that it was --

14 MR. ANDERSON: Before we go any
15 further, the program, they planned to show
16 Mr. Kitchen, how long of a program was it?

17 MR. COLE: Exactly the same that
18 you have seen, exactly the same program I
19 showed you, exactly the same program that
20 is taught every school employee up here.
21 It was brand new. It was exactly the same
22 one.

23 MR. ANDERSON: Well, the simple

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1 reason for me being here tonight, if it
2 wasn't for my people from the union saying
3 we got a problem of what is happening here
4 I wouldn't be here tonight. There are a
5 lot of concerned people that are members
6 of this organization in the Oregon Schools
7 that do not want to participate and to my
8 knowledge no one has volunteered from here
9 and I do have one other question that was
10 brought out by a farmer in the area and
11 he is also a school board employee.

12 What happens if the radiation gets
13 washed down in the showers, where does it
14 go?

15 MR. COLE: It goes the same
16 place that all the rest of the water goes.
17 Okay. Now, you want to know the quantity
18 of radiation that is going to stick to
19 someone if they happen to be --

20 MR. ANDERSON: Everyone -- most of
21 them believe they can't wash it off.

22 MR. BEMENT: Please let Mr. Cole
23 respond.

1 MR. ANDERSON: I'm sorry.

2 MR. COLE: The amount of
3 radiation that sticks to someone that
4 possibly could be washed off in the shower,
5 the sewer system is exactly where it
6 belongs. There has never ever been any
7 technical proof to show that the
8 contamination showers should have holding
9 tanks anywhere for anyone coming out the
10 10-mile EPZ. It is inconceivable that
11 anyone could have that much radioactive
12 material on them. If they did have that
13 much radioactive material on them wouldn't
14 it be nice to know that it is going into
15 the sewer system instead of staying on that
16 individual.

17 MR. ANDERSON: Yes, it would. My
18 other question is, and this was brought up
19 by parents at the Wynn School area, which
20 their children will be coming to the school
21 here at the junior high level, why if there
22 was nuclear evacuation and there is a
23 problem, why would we not evacuate the

1 students from Eisenhower Junior High to a
2 safer area?

3 MR. HICKEY: Eisenhower is outside
4 the 10-mile EPS and that is why this one
5 was chosen, the centers.

6 MR. ANDERSON: Thank you.

7 MR. BEMENT: I believe there is a
8 lady who didn't sign one of these forms but
9 would like to make a statement.

10 A VOICE: Yes. I will come up
11 and speak.

12 I am just concerned about the
13 disabled people. Now, I have made a very
14 strong effort to get everybody in our
15 10-mile zone in Jerusalem Township on my
16 disabled list. I have concerns about the
17 list. I gave a copy of the list to Davis
18 Besse and then I thought about it and I
19 made them bring it back and to my knowledge
20 the fire coordinator, the fire chief and I
21 have the only list. We have an awful lot
22 of elderly widows and my concern that this
23 list might get out and crooks would have a

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1 field day and if there is someone that is
2 disabled that is not on my list I would
3 like to know it.

4 The other thing about the flooding,
5 when we know it is coming, we get our cars
6 out the first thing. I live in a flood
7 zone and the first thing we do is to move
8 cars. I don't think that is a problem. If
9 Davis Besse has a problem and there is a
10 flood first, we're gone.

11 MR. BEMENT: Any other comments
12 from the audience at this point?

13 MR. UPPER: My name is Harold
14 Upfer and I live in Oak Harbor and I am a
15 C-ounty Commissioner for Ottawa County. I
16 only have a short question. How long will
17 we have to submit written testimony to you
18 folks after the hearing tonight? Since the
19 State of Ohio has presented the report of
20 the ERT team to you the various counties
21 who are affected by that report have put
22 together some comments and responses to it
23 and we would like, I particularly would

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1 like to contact the counties and solicit
2 their approval and comments on that report
3 to you.

4 MR. BEMENT: I would ask that they
5 submit their report within the next 30 days
6 so that it can be received in a timely
7 manner. I have to put some kind of time
8 frame together so I would suggest 30 days.

9 MR. UPPER: Thank you.

10 MR. BEMENT: Are there any other
11 comments?

12 A VOICE: Yes. My name is
13 Mrs. Davis and I live at 128 Lagoon Drive,
14 Jerusalem Township. And I am an alternate
15 to one of the Trustees for Jerusalem
16 Township and I want to know why we were not
17 asked to participate in the emergency
18 evacuation plan the 31st. I went to the
19 classes down the Civil Defense but I felt
20 that we should have participated in this
21 because there are only three of us and I
22 don't think three would have made that much
23 difference.

1 MR HICKEY: Well, it was set up
2 that the Trustees -- of course we have the
3 Trustees participating and it was felt that
4 in order to demonstrate that you are able
5 to staff 24 hours a day that you couldn't
6 double up your staffing at that particular
7 time, why, you were in fact -- the deputy
8 director was there. They wouldn't allow
9 him to participate because I was
10 participating.

11 I think since that time that Mr.
12 Bement had stated that double participation
13 is not -- that it is allowable and that is
14 what we would do in the next exercise and
15 we would get all those people involved and
16 those people who would be the back up to
17 the various individuals that are there
18 originally and give them the opportunity
19 also.

20 That is what happens. We have
21 talked previously and we wanted to double
22 staff at that particular time but it was
23 suggested to us by -- I don't know who made

1 the suggestion, that that was not the way
2 the game was played at that particular time
3 and we couldn't utilize it at that time.
4 The backup was supposed to be backup coming
5 in at some later date.

6 A VOICE: Okay. In regard to
7 her, I live on the shores of Lake Erie and
8 I have been in four floods and we always
9 take our cars out right away and I am not
10 afraid of Davis Besse. God bless her.

11 MR. BEMENT: Thank you, ma'am.
12 Are there any other comments or statements
13 that anyone wishes to make.

14 The record should note that there
15 are no indications of further comment. I
16 will now declare this meeting closed at six
17 minutes after 9. Thank you very much for
18 coming to the meeting.

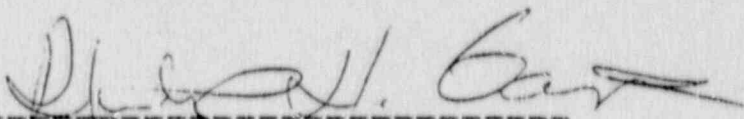
19 - - -

20 C E R T I F I C A T E

21
22 I, Philip H. Gaines, a Notary Public
23 in and for the State of Ohio, duly

1 commissioner and qualified, do hereby
2 certify that the above and foregoing is a
3 true and accurate transcription of my notes
4 as requested.

5 IN WITNESS WHEREOF, I have hereunto
6 set my hand and affixed my seal of office
7 at Toledo, Ohio, on this 7th day of May,
8 1987.

9 
10 -----

11 PHILIP H. GAINES

12 Notary Public

13 in and for the State of Ohio

14
15 My Commission expires December 26, 1987.

16 - - -



STATE OF OHIO
OFFICE OF THE GOVERNOR
COLUMBUS 43215

JAMES A. RHODES
GOVERNOR

February 25, 1981

Mr. Robert E. Connor
Acting Director, Region V
Federal Emergency Management Agency
One North Dearborn, Room 540
Chicago, Illinois 60602

Dear Mr. Connor:

The State of Ohio, acting within the guidance of the U.S. Nuclear Regulatory Commission (NRC) and the Federal Emergency Management Agency, has prepared a plan for Ohio citizens in the event that a nuclear power plant incident should have significant offsite involvement. This Plan entitled "The Ohio Plan for Response To Radiation Emergencies at Licensed Nuclear Facilities" has been developed with close coordination between state agencies and local government. The plan is designed to provide an overall state plan approach. It allows for the inclusion of each county plan where that county lies within a 10 mile Emergency Planning Zone, as an annex to the plan.

It is the opinion of this Administration that the plan as developed is adequate to protect the public health and safety of the citizens of Ohio in general and specifically those living near the Davis Besse Nuclear Power Station. As the requirement arises, additional plans will be added for nuclear reactors built at other locations in Ohio.

The Ohio Disaster Services Agency coordinated the development of this plan and worked closely with the FEMA chaired Regional Advisory Committee. After numerous reviews and comments all resolution points have been included in the plans now submitted. The criteria have been rigidly adhered to and it is felt that in many cases the plan goes beyond the federal guideline minimal requirements.

It is now requested that a formal review of the Ohio Plan be made with the appropriate comments forwarded thru the FEMA National office to the NRC. Your reviews and evaluations have been most helpful previously and it is our hope that the FEMA National recommendations to the NRC will result in favorable action in comments on the Ohio Plan.

Currently these plans may be reviewed by the public at the following locations:

Ohio Disaster Services Agency
2825 West Granville Road
Worthington, Ohio 43085

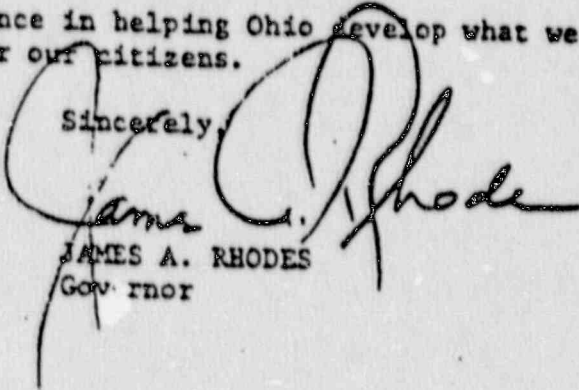
The Ottawa County Courthouse
Commissioners Office, Room 103
315 Madison Street
Port Clinton, Ohio 43452

The Ida Rupp Public Library
310 Madison Street
Port Clinton, Ohio 43452

The Ohio State Library
65 South Front Street
Columbus, Ohio 43215

Thank you for your fine assistance in helping Ohio develop what we feel is another measure of caring for our citizens.

Sincerely,


JAMES A. RHODES
Governor

response plans. Since FEMA has a responsibility for reviewing the State and local government off-site plans, the State of Ohio has submitted its radiological emergency plans to FEMA Region V office. These plans support the Toledo-Edison Company's Davis-Besse Nuclear Power Plant located in Ottawa County.

DATE Plans Received: February 23, 1981.
FOR FURTHER INFORMATION CONTACT:
Mr. Robert E. Connor, Acting Regional
Director, FEMA Region V, One North
Dearborn Street, Chicago, Illinois 60602.
(312) 353-1500.

SUPPLEMENTARY INFORMATION: In support of the Federal requirement for off-site emergency response plans, FEMA has proposed a Rule describing its procedures for review and approval of State and local governments' radiological emergency response plans. Pursuant to this proposed FEMA Rule (44 CFR 350.8), "Review and Approval of State Radiological Emergency Plans and Preparedness," 45 FR 42341, the State Radiological Emergency Plan for the State Ohio and Ottawa County was received by the Federal Emergency Management Agency Region V Office.

Included are plans for local governments which are wholly or partially within the plume exposure pathway emergency planning zones of the nuclear plant. For the Davis-Besse Plant, plans are included for Ottawa County.

Copies of the Plan are available for review at the FEMA Region V Plans and Preparedness Division, REP Section, Federal Center, Battle Creek, Michigan 49016. Copies will be made available upon request in accordance with the fee schedule for FEMA Freedom of Information Act requests, as set out in subpart C of 44 CFR Part 5. There are 563 pages in the document; reproduction fees are \$2.10 a page payable with the request for copy.

Comments on the Plan may be submitted in writing to Mr. Robert E. Connor, Acting Regional Director, at the above address on or before May 12, 1981.

FEMA proposed Rule 44 CFR 350.10 also calls for a public meeting prior to approval of the plans. A public meeting on the State and local jurisdiction plans for the Davis-Besse plant was held November 7, 1980, at 1:30 p.m., American Legion Hall, 118 Monroe Street, Port Clinton, Ohio.

Marnice L. Vandal,
Acting Regional Director, FEMA Region V,
March 23, 1981.

(FR Doc. 81-11015 Filed 4-16-81; 8:45 am)
BILLING CODE 6710-01-0001

[Docket No. FEMA-REP-8-OH-1]

Receipt of Ohio Radiological
Emergency Plan

AGENCY: Federal Emergency
Management Agency,

ACTION: Notice of receipt of plan.

SUMMARY: For continued operation of nuclear power plants, the Nuclear Regulatory Commission requires approved licensee and State and local government radiological emergency