

FEMA'S SUPPLEMENTAL TESTIMONY OF
FEBRUARY 21, 1983 CONCERNING COMMISSION QUESTIONS 3 AND 4

Q.1 Do you have a statement of professional qualifications?

A. Yes, my statement of professional qualifications is attached to this supplemental testimony.

Q.2 When did Roger Kowieski first become involved in emergency planning?

A. Mr. Kowieski first became involved in emergency planning in 1978 as Regional Dam Safety Coordinator. In 1981, Mr. Kowieski was appointed by the Regional Director as the Chairman, Regional Assistance Committee, responsible for the REP Program. Since that time, he managed the REP program and dam safety activities in FEMA, Region II.

Q.3 Please describe the nature of that involvement up to the present time, including the various activities engaged in, persons communicated with and responsibilities.

A. As Regional Dam Safety Coordinator (1978 - present), he is responsible for the management and successful implementation of the Dam Safety Program within the Region including Emergency Action Planning. In this position he works closely with the highest level Civil Defense Officials of the state, county and local governments, U.S. Army Corps. of Engineers, National Weather Service, Federal Energy Regulatory Commission, universities, private consultants and professional organizations responsible for promoting dam safety programs in the interest of public safety and welfare.

In 1979, Mr. Kowieski chaired FEMA's National Task Force on dam safety and submitted a policy recommendation on FEMA's role in Dam Safety. Also in 1979, he organized, managed and conducted the Federal Emergency Management Agency's first Dam Safety Conference attended by Civil Defense Director's, dam owners and public officials responsible for the public safety and welfare. Since November 1981, Mr. Kowieski was responsible for the Radiological Emergency Preparedness Program in the position of the Chairman of the Regional Assistance Committee. In this capacity he provided a high level of technical assistance to state and local governments in preparation of plans required to meet federal regulations. Performing these duties he dealt with high level federal, state and local officials, community leaders, private citizens and news media representatives.

Q.4 Are you authorized to present to the Board the current FEMA evaluation of the Indian Point PERP for offsite emergency preparedness? Does your testimony represent that current FEMA evaluation?

A. Yes.

Q.5 Has FEMA prepared a report dealing with the status of plan revisions, equipment purchases and training as they relate to the significant deficiencies in five planning standards identified in July 1982?

A. Yes. The report is attached to this testimony (Attachment 1).

- Q.6 What procedures are being utilized by the Federal Emergency Management Agency to verify that the resources called for in the Radiological Emergency Response Plan are available and that emergency workers are receiving the training called for in the plan?

Indian Point Verification

- A. One component of the Federal Emergency Management Agency's 44 CFR 350 review process pertaining to the State and local Radiological Emergency Plans and Preparedness surrounding the Indian Point Nuclear Generating Facilities is verification that elements of the plan are, in fact, in place, and individuals are capable of carrying out assigned responsibilities. The surveys will also provide State and County personnel with feedback and assist FEMA in preparing for the March 9th exercise.

The Argonne National Laboratory, under contract to FEMA, developed questionnaires to be used in surveying various components of the Indian Point Radiological Emergency Preparedness Plans. This work is being supervised by the Region II staff of FEMA. The elements to be surveyed are:

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|---------------------------|--|
| o bus companies | o schools (to be evacuated) |
| o congregate care centers | o Special facilities (to be evacuated) |
| o reception centers | o personnel monitoring centers |
| o hospitals | o county EOC checklists |
| o ambulance companies | |

The FEMA verification procedures are based on generally accepted statistical sampling methods, which involve randomized selection of the facilities to be surveyed.

FEMA is cognizant of the fact that much remains to be done in the area of training in order to increase preparedness. Therefore, the questionnaires are relatively basic.

3.10 The emergency plan fails to conform to NUREG.0654 in that, contrary to Evaluation Criterion II J.10.d. proper means for protecting persons whose mobility may be impaired have not been developed. Specifically, adequate provisions have not been made for groups named in the bases submitted for the following contentions.

Westpac 6
UCS/NYPIRG I(B) (2), basis 6 and I(A) basis (7)
Parents I, basis (22) and II basis

Contention 3.10: Response

Element J.10.d. of NUREG .0654 does not specify a single method for protecting mobility impaired individuals. In many cases sheltering may be a better protective action than evacuation. Significant improvements in planning have or are scheduled to be undertaken for those institutions within the 10-mile EPZ that house mobility impaired individuals.

We understand that the majority of special facilities own the vehicles which would be used if evacuation becomes necessary. The plan identifies the private bus companies which would be used to supplement the special facilities resources providing buses and vans in the event of emergency.

During the 120-day clock period significant progress in planning was made for non-institutionalized mobility impaired persons and those who do not speak English.

The revised county plans provide two (2) primary methods for identifying the non-institutionalized mobility-impaired population:

- o the public information pamphlets distributed annually will include a mail-in postal card. This will identify this population in advance, and

- o at the time of an accident, special telephone number (s) will be announced over the broadcast media; mobility-impaired persons will be able to call to request transportation.

In addition, the four counties have agreed to contact appropriate agencies and facilities to solicit information about additional mobility impaired persons. The Department of Social Services in Westchester and Orange Counties are responsible for evacuation needs of mobility impaired persons. In Putnam, the Fire and Rescue Service is in charge. In Rockland, the Civil Defense Director is responsible. Each county will maintain an update confidential list of non-institutionalized mobility impaired persons. In case of a radiological emergency, each county EOC would be manned by a representative from the County Agency responsible for the special problems of mobility impaired persons. If evacuation becomes a possibility, staff will activate its procedures, including notification to, and coordination with EOC command.

With regard to the inmates of Ossining Correctional Facility, there is a very definite NYS Department of Corrections' policy for the Ossining facility: to shelter inmates, the facility has sufficient shielding capability. In addition, potassium iodide will be issued should it become necessary. Staffing of the facility is the responsibility of the NYS Department of Corrections and is provided for its procedures.

It is FEMA's belief that most of the special population who are not institutionalized live with other individuals or have neighbors who would assist in protecting them in the event of an accident. It seems logical to conclude that people who do not live within the 10-mile EPZ but spend considerable time there would seek information from others and in the event of an accident listen to the Emergency Broadcast System (EBS).

4.7 The emergency plans should be upgraded to provide more adequate methods for alerting and informing persons who are deaf, blind, too young to understand the instructions or who do not speak English.

Since FEMA last testified before the Board, new initiatives have been developed to educate the public residing within the EPZ. The public education brochures are being revised and will be distributed as they become ready. Training has occurred and more is scheduled.

According to the New York State Radiological Emergency Preparedness Group, the siren system has been individually tested as well as augmented as follows:

Of the original eighty-eight sirens already installed, ten will be relocated; three in Orange County, two in Rockland County, and five in Westchester County. In addition to those sirens already upgraded, three more will be upgraded to 122 decibels.

In addition, twenty-three sirens will be installed, bringing the total number to 142. Of these, ten will be installed in Rockland County and thirteen in Westchester County. Installation was to begin about January 10, 1983.

FEMA believes that significant improvements have been made in the siren system. All units have been individually tested and additional sirens installed. As soon as FEMA's alert and notification procedures are finalized, a formal evaluation of the alert and notification system will be undertaken.

FEMA believes that not all the residents of the EPZ do understand the brochures. However, we do believe that in the event of an accident the residents would follow instructions provided by the EBS.

The Public Information Officers (PIO) Work Group, established during the 120-day clock, conducted a survey of non-English speaking persons residing in the Indian Point 10-mile emergency planning zone. This survey identified several relatively small non-English speaking communities. These include 17 Greeks (St. Basil's School, Putnam County); 958 Spanish and Portuguese and possibly their families (Ossining, North Rockland, and 2 or 3 families in Croton Harmon/Briarcliff Manor); 378 Haitian/Creole and possibly their families (East Ramapo and Nyack); approximately 2,000 Yiddish (New Square); and 50 persons who speak Oriental languages.

FEMA agreed with the State and counties recommendation that it would be impractical to develop brochures in languages other than English considering the limited number of non-English speaking residents. The state and counties recommended that a more effective way of reaching the non-English speakers would be through the community social and religious leaders.

In addition, special measures such as posters and telephone inserts are being developed as part of a Public Education Program for transients including those using recreational areas. These measures are scheduled to be implemented in 1983.

Roger B. Kowieski
PROFESSIONAL QUALIFICATIONS

Roger B. Kowieski is employed at FEMA, Region II, New York. Mr. Kowieski is currently serving as the Chairman of the Regional Assistance Committee, Natural and Technological Hazards Division, Region II, Federal Emergency Management Agency.

Mr. Kowieski holds an MS in Environmental Engineering from Wroclaw Polytechnic Institute, Poland and a Professional Engineer License from the State of New Jersey.

The witness began to acquire skills in management, planning, and design while working for the private sector. From 1971 to 1973, Mr. Kowieski worked for Louis Berger Associates where he was involved in design of interstate highways and water resources projects. In 1973, Mr. Kowieski joined URS Corporation as a Project Manager. In this capacity he was responsible for planning, design, and management of various projects in water resources and environmental fields including flood hazard identification studies, flood control, sewage treatment plants for hazardous waste, instrumentation, and Environmental Impact Statements.

The witness began his Federal services in 1977 with the Federal Insurance Administration (FIA) in the U.S. Department of Housing and Urban Development. As an Assistant Director for Engineering with FIA (1977-1980), the witness was primarily responsible for the management, administration and implementation of all Flood Insurance Studies, dam safety program activities and other floodplain related activities in the Region. In this capacity, the witness monitored, supervised, and coordinated the work of approximately 25-30 private engineering consultants and federal agencies conducting work in New Jersey, New York, Puerto Rico, and the Virgin Islands. He also provided technical assistance to State and local officials on various flood damage mitigation techniques and flood warning methods designed to increase the public awareness and to reduce future flood losses.

Appointed by the FIA Administrator to the Task Force comprised of national experts in hazard mitigation, he assisted the Administrator in analysis evaluation and re-direction of external and internal operations of FIA Programs. (1978).

In 1978, Mr. Kowieski was also named as Regional Dam Safety Coordinator responsible for the management and successful implementation of the Dam Safety Program within the Region. In this position, he was involved in emergency action planning for dams and reservoirs. This involved the evaluation of emergency planning in the event of dam failure, delineating the inundation areas, and preparing notification and evacuation plans.

In 1981, Mr. Kowieski also served as Acting Director of the Insurance and Mitigation Division responsible for the management and planning of all activities related to the NFIP and hazard mitigation.

With the realignment of the Regional Office in November 1981, Mr. Kowieski was named Acting Chief, Technological Hazards and Engineering Support Group and the Chairman of Regional Assistance Committee. In this capacity, the witness was responsible for managing and administering all of engineering activities pertaining to the NFIP, Radiological Emergency Preparedness Programs, Dam Safety Program, and hazardous materials program.

Roger B. Kowieski (Continuation)

As Chairman of the Regional Assistance Committee, the witness dealt with those representatives of the Governor responsible for the REP program, the Department of Health, the legislature, and emergency services agencies. In this capacity, he provided a high level of technical assistance to State and local governments in preparation of plans required to meet federal regulations. Under his direction and supervision as RAC Chairman, Region II successfully completed a large amount of work with very limited staff, including reviews and exercises for Nine Mile Point, Ginna, Indian Point, Oyster Creek, and Salem. In December 1982, Mr. Kowieski was promoted to Project Officer, Natural and Technological Hazards Division. In this capacity the witness assists the chief of the division in managing the activities of the division, including Radiological Emergency Planning Programs, National Flood Insurance Program, and the Dam Safety Program.

UPDATE REPORT
ON
THE STATUS OF REMEDIAL ACTIONS
CITED IN THE
JULY 30, 1982 INTERIM FINDINGS ON THE ADEQUACY
OF
RADIOLOGICAL EMERGENCY RESPONSE PREPARATION
OF
STATE AND LOCAL GOVERNMENTS
AT THE
INDIAN POINT NUCLEAR POWER STATION

DECEMBER 16, 1982

Prepared by the
FEDERAL EMERGENCY MANAGEMENT AGENCY
REGION II



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I. BACKGROUND

In response to a request from the Nuclear Regulatory Commission (NRC) dated June 16, 1982, the Federal Emergency Management Agency (FEMA) submitted its "Interim Findings on the Adequacy of Radiological Emergency Response Preparation of State and Local Governments at the Indian Point Nuclear Power Station", dated July 30, 1982.

Determinations of adequacy in the Interim Finding were based on a review of the radiological emergency response plans of the State of New York and the counties of Orange, Putnam, Rockland and Westchester, as well as on the observed performance of these political jurisdictions during an exercise of the plans conducted on March 3, 1982, and upon a review of comments made at two public meetings held in Westchester and Orange counties on July 26 and 27, 1982. Based on the review of the responses from the State of New York relating to the State and County components of the Radiological Emergency Preparedness Plan (REPP), and after review of the legislative action taken by the Rockland County Legislature (Resolution 320, dated May 18, 1982), FEMA determined that significant deficiencies existed with respect to five planning standards of NUREG-0654/FEMA-REP-1. These planning standards along with highlights of the specific deficiencies for each standard are listed below.

o Notification Methods and Procedures (Planning Standard E)

- Observed equipment failures of the alert and notification system (sirens).
- Lack of criteria at the State and County level to determine what emergency public information would be disseminated via Emergency Broadcast System and through news releases.

o Public Education and Information (Planning Standard G)

- Lack of complete public education campaign regarding Emergency Response Planning Areas (ERPAs) and reception and congregate care centers.
- Inadequate distribution of the Public Education brochure. Emergency Planning Zone residents should be made aware of the number of the ERPA in which they reside, since emergency public information is provided by ERPA zone number.
- Need for publication of the public information brochure in language(s) other than English.
- Inadequate arrangements for rumor control.

o Protective Response (Planning Standard J)

- Inadequate means for notification of transients
- No maps showing population distribution around the nuclear facility.
- No provisions for use of radioprotective drugs for emergency workers.
- No identification of and means for dealing with impediments to use of evacuation routes.
- No details of protective measures to be used for ingestion pathway.

- Inadequate means for monitoring of evacuees at relocation centers.
- Possible non-response by private and public bus operators for evacuation of public transportation dependent population in Westchester County.

o Radiological Exposure Control (Planning Standard K)

- Absence of permanent record dosimeters and 24-hour capability to determine doses received by emergency personnel.
- Insufficient personnel and equipment resources for decontamination of personnel.

o Responsibility for the Planning Effort (Planning Standard P)

A resolution enacted by the Rockland County Legislature, dated May 18, 1982, directing county staff not to cooperate with the utilities, NRC and FEMA in the federally mandated radiological emergency planning process.

- The State and Rockland County have not provided adequately for training of individuals responsible for the planning effort in Rockland County.
- Rockland County's withdrawal from the Radiological Emergency Preparedness process made it unable to assume the updating of its plan, as needed.
- Rockland County's withdrawal from the REP process made it unable to review its plan on an annual basis, and certify it to be current.

Following the FEMA transmittal to the NRC of August 2, 1982, the Administrator of NRC Region I invoked its 120-day regulatory clock on August 3, 1982. FEMA Region II staff met with the New York State Radiological Preparedness Group (REPG) on August 18, 1982 to discuss a timetable by which the State, counties and utilities would implement remedial actions required to correct the deficiencies identified by FEMA Region II. It was also agreed that the task force approach would best accomplish the timely implementation of these remedial actions.

The remedial actions developed to address the deficiencies in the interim report were divided into 34 sub-elements within the five planning standards and were set forth in a working document entitled, "Interim Findings Indian Point Radiological Emergency Preparedness, Remedial Action Schedule", which was based on the Indian Point Interim Findings Report. The task force groups which were set up are outlined below:

- o Executive Work Group — REPG and FEMA;
- o Public Information Officers (PIO) Work Group — REPG, New York State PIO, FEMA, PASNY, Con Ed, Westchester, Putnam and Orange Counties;
- o Plan Revision Task Force — REPG and FEMA;

- o Radiological Task Force — New York State Department of Health (DOH), FEMA and the U.S. Environmental Protection Agency (EPA); and
- o Ingestion Task Force — DOH, FEMA, and the U.S. Food and Drug Administration (FDA).

The primary role of FEMA, EPA and FDA and other RAC members was to assist their State, County and utility counterparts on the five working groups in developing the remedial actions.

Seven bi-weekly progress report meetings on the Remedial Action Schedule for Indian Point radiological emergency preparedness were held, beginning on September 8, 1982 and concluding on November 29, 1982. These meetings were attended by staff of FEMA Region II and, on several occasions, by FEMA National Office staff, representatives of NRC Region I, USEPA Region II, FDA Region II, PASNY and Con Edison, New York REPG and Department of Health, and Orange, Putnam, and Westchester Counties. Rockland County officials observed several of the meetings. Representatives of intervenor groups and the press also observed some of the sessions.

On December 1 and 2, 1982, FEMA representatives met with REPG staff in Albany, New York in an effort to obtain a final agreement on remedial actions necessary to resolve all outstanding deficiencies. The bi-weekly progress report meetings, and the final meetings in Albany, have been marked by full and frank exchanges of views, carried out in a spirit of cooperation by all parties involved.

FEMA agreed to provide this report consisting of an update of progress made on correcting the five significant deficiencies and a comprehensive plan review, no later than December 17, 1982. This update, provided in accordance with the FEMA-NRC Memorandum of Understanding, reports on the current status of remedial actions completed or underway to correct significant deficiencies in five planning standards. This report reflects the status of plan revisions, equipment purchases and training as they relate to previously identified deficiencies.

FEMA would like to acknowledge the fact that the REPG staff, employees of the counties and personnel of both utilities have put forth an impressive level of effort and, through effective management, hard work and dedication, have made significant progress.

II. STATUS OF REMEDIAL ACTIONS

FEMA and RAC members have reviewed many documents relating to remedial actions during the past several months. In some cases, appropriate plan revisions have been made, in others the actual plan revisions must still be made in the future. Mr. William C. Hennessy, Chairman of the Disaster Preparedness Commission, in a December 3, 1982 letter to Mr. Frank P. Petrone, Director of FEMA Region II, committed to formally submit the plan revisions to FEMA on behalf of the Governor. On December 7, 1982, FEMA received a commitment from REPG to make all formal plan revisions by January 15, 1983.

E. Notification Methods and Procedures

The deficiencies noted in the interim report have been adequately addressed.

The need for corrections to the alert system (siren system) and documentation of the operability of the system has been addressed in submittals from the State/utility dated November 17, 1982, certifying that the siren system now in place is operable.

Criteria for the content of EBS messages and news releases was developed by October 5, 1982 along with generic EBS messages. Procedures for PIOs have been revised to correspond to the plan revisions being made as part of the remedial actions.

Improvements were made, on October 19, 1982, in the procedural steps for alerting, notification and mobilization of emergency response personnel in Rockland County, including use of new paging equipment. The State plan was revised on September 22, 1982 to improve procedures for contacting Federal agencies. Initial PIO training on revised procedures was completed on November 5, 1982 and a schedule of future training submitted.

The Hudson Valley and Catskill New York Operational Area 3 EBS plan was received by FEMA on September 9, 1982. Authenticator code envelopes are available on a need-to-know basis at the WABC News Center and in the Westchester EOC. The additional backup phone number was given to Westchester County, the EBS activating county, prior to December 1, 1982 to assure the ability to activate the EBS system. Meetings were held during November 1982 with managers of WABC, WFAS and other EBS stations covering the 10-mile EPZ to discuss EBS activation and the importance of station participation during exercises and in the event of a real emergency.

Orange and Rockland Counties tested their sirens during the 120-day period. FEMA observed the Orange County test and found that eleven of twelve sirens sounded. A formal report from the State is anticipated by January 15, 1983.

G. Public Education and Information

The deficiencies noted in the interim report have been adequately addressed.

A comprehensive public education program has been developed which utilizes various methods to provide information about the emergency plans on an ongoing basis, including radio public service announcements, newspaper ads, and a speakers' program. During November 1982, newspaper ads in the area weekly and daily newspapers and radio public service announcements provided information to residents on how to obtain the brochure, Indian Point and You. Future ads and radio announcements are planned during three time intervals in 1983. The utilities have funded four new positions in the four county area to assist with public education and training activities. The distribution of the new public information brochure is planned for February or March of 1983.

In September 1982 the State furnished FEMA with a survey of non-English speaking students and, where possible, the English proficiency of their families. Based on the data presented in this survey report, there is no need to publish the information brochure in languages other than English. An outreach program for the non-English speaking residents, which was proposed by the State and endorsed by FEMA, has been initiated through contacts with community, social, and religious leaders.

Plan revisions have been made and procedures developed to address rumors. The rumor control procedures are modelled after the Oswego County system which was successfully demonstrated at the James A. Fitzpatrick Exercise on August 11, 1982.

Information for transients will be put in place in late February or March 1983 (to coincide with brochure distribution) and material for telephone directories in the four county area will be supplied in the fall of 1983.

Also included in the plan revisions is additional information on physical arrangements and equipment availability in the Joint Media Center. The current alternate Joint Media Center located in White Plains, New York was inspected and found acceptable as an alternate by FEMA on December 2, 1982. A new primary site for the Joint Media Center is being sought and is targeted for completion by July 1983.

J. Protective Response

All but one of the deficiencies noted in the interim report have been adequately addressed.

Posters, planned for distribution in February or March 1983, and a telephone book insert for fall 1983 phone books are being prepared to get information to transients. Maps, with population information by ERPA, are now available in county EOCs.

The State and Counties have adopted the Food and Drug Administration recommendation on use of Potassium Iodide (KI) for emergency workers and captive populations. The new policy states that KI will be given when thyroid dose projections exceed 25 Rem.

Procedures have been revised to give additional information on means for clearing impediments on evacuation routes. The Counties will use county, town or village equipment or local private contractors to provide necessary resources. The means of implementing these procedures are in place now.

Adequate information on surface water inventory and the location of produce and dairy farms was furnished to FEMA. This completes information requirements for ingestion pathway protective actions.

Procedures have been developed for monitoring capability at congregate care centers and for transmission of field data to decision makers. Based on information furnished to FEMA on December 1, 1982, in the event of an emergency each county EOC will be manned by a representative of the respective county agency responsible for special problems of the mobility impaired. If evacuation is recommended, these agencies will carry out their responsibilities to arrange for evacuation. Additional public information programs will be used to inform the mobility impaired persons of methods of receiving assistance. The current information brochure contains phone numbers to be called for assistance and the comprehensive public information program, discussed above, will publicize these numbers.

Additional maps, not available in the last exercise, were provided on October 20, 1982. All relocation centers have been certified to be outside the 10-mile Plume Exposure EPZ.

The only deficiency in Planning Standard J, which is not adequately addressed at the present time, concerns the possible non-response of commercial bus drivers used for evacuation in Westchester County. Therefore, this planning standard remains significantly deficient.

Alfred DelBello, the Westchester County Executive, in a letter dated June 2, 1982 to the NRC Commission Chairman, and again in the public meeting of July 26, 1982, has expressed concern that commercial bus drivers, over which the county exercises no direct control on letters of agreement, may not respond to a radiological emergency at Indian Point. The Westchester County Radiological Emergency Response Plan (WCRERP) relies on both public and commercial bus drivers for emergency evacuation of populations dependent on public transportation. As a compensating measure, the REPG proposes to rely upon New York State military forces (National Guard) to respond to an emergency at the Indian Point Nuclear Power Generating Station replacing private and public bus operators who do not respond. REPG has provided for review by FEMA a New York State Division of Military and Naval Affairs (DMNA) plan for the utilization of military forces to replace civilian bus drivers. This plan, "OPLAN Radiological Emergency--Indian Point", sets forth detailed procedures for a DMNA takeover of bus fleets and evacuation of public transportation dependent populations in Westchester County by commercial or school buses manned by New York State military forces.

FEMA has evaluated the DMNA plan to compensate for the possible failure of local bus drivers to respond to a radiological emergency at Indian Point and found it would require an additional 4 to 5 hours, above the normal evacuation times, to complete. In a worst case situation, i.e., an evacuation required for all sectors and no response by any commercial drivers, the additional time required for the military to respond cannot be judged by FEMA to be adequate to protect the public health and safety. Mr. DelBello also expressed reservations about the additional time required to utilize military drivers in a County critique transmitted to NRC Chairman Palladino, dated December 6, 1982.

The State is continuing its efforts to address this important issue. REPG has reported that it intends to fund a comprehensive study of the mass transit portion of the Westchester RERP to commence in early 1983. Based on the results of that study, a more effective solution to the needs of public transportation-dependent residents of Westchester County is to be developed.

K. Radiological Exposure Control

The deficiencies noted in the interim report have been adequately addressed.

The State agreed on December 2, 1982 to initiate immediately procurement of the permanent record dosimeters required for a response at Indian Point and have started a phased acquisition of low range self-reading dosimeters. High range civil defense dosimeters will be used in the interim.

Revisions in decontamination procedures are being made in the plan and the State training manual and will be completed by January 15, 1983. The State is developing numeric requirements for both trained personnel and equipment for use at monitoring and decontamination facilities and this information will be included in the plans by January 15, 1983. Revisions in the plan and State training manual with regard to disposal of contaminated wastes generated by decontamination will be completed by January 15, 1983. Monitoring equipment will be checked for proper operation quarterly and calibrated annually.

P. Responsibility for the Planning Effort

On May 18, 1982, the Rockland County Legislature enacted Resolution #320. This resolution and Resolution #473, enacted on July 13, 1982, provided for the following:

- o Rockland County would no longer participate with FEMA, NRC, Con Ed and PASNY in development of the Federally mandated Radiological Emergency Response Plan for Indian Point.
- o Rockland County would prepare its own Nuclear Emergency and Preparedness Plan and General Disaster Preparedness Plan.
- o Rockland County would, nevertheless, cooperate with all State and Federal agencies in coordinating an emergency response to an actual radiological accident at Indian Point NPGS.

State officials originally construed the actions by the Rockland County Legislature as a withdrawal of Rockland's participation in preparedness for the offsite consequences of a radiological accident at Indian Point. On this basis, the State undertook the developing of plans and procedures whereby State officials would assume the County's responsibilities under the existing plan. Their basic premise was that in the event of an incident at Indian Point the Governor would make an emergency declaration and dispatch predesignated and trained State employees to staff the Rockland County Emergency Operating Center.

On November 18, 1982, Mr. John T. Grant, Chairman of the Rockland County Legislature, sent a letter to the NRC Commissioners which made the following points:

- o that the original Rockland County Radiological Emergency Response Plan was evolved without necessary input from local officials and, therefore, much of the plan was unworkable.
- o that because of the time required, a State takeover of local emergency services and resources in an actual emergency would not be any better than adoption of the original plan.
- o that Rockland County would develop their own Radiological Emergency Plan.

Since then FEMA has observed a tabletop exercise on November 30, 1982 in which key county and State agencies participated in responding to a simulated accident at Indian Point. FEMA has also been assured by both State and County officials that a new plan is being drafted. According to the Vice Chairman of the Rockland County Legislature, a preliminary version will be ready for FEMA/RAC review in January of 1983.

On December 7, 1982 the Rockland County Legislature adopted two new resolutions. The first, #796, called for the reactors at Indian Point to remain shut down.

The second, #829, amended resolution #320 by deleting and replacing the fourth and fifth resolved clauses so that the County can obtain the greatest possible financial assistance for the development of its plan.

The resolution also resolved that:

- o the Legislature disavowed the initial plan and directed that all future County efforts and expenditures be devoted to the development and implementation of the plan being prepared by the County Office of Emergency Services.
- o the Legislature directed the Chairman to call upon State and Federal agencies, including FEMA and NRC, as well as Con Edison and PASNY to provide the County with such assistance as they can furnish in the development of the new plan.

However, as of this date, FEMA must conclude that Planning Standard 2, Responsibility for the Planning Effort, remains significantly deficient. This is primarily due to the County's earlier lack of involvement in the planning and preparedness activities subject to FEMA evaluation. Until Rockland County's Plan is developed, reviewed by the Regional Assistance Committee, and personnel trained on the new plan the original emergency plan must be utilized to respond to an incident. This plan has been disavowed by the Legislature of Rockland County. The Chairman of the County Legislature has also expressed to the NRC that the assumption of County functions by State personnel would not be adequate.

Since the issuance of the Interim Report, there has been significant progress in Rockland County. In the past three months, the County has obtained funds, equipment and training. The County also has agreed to develop a Radiological Response Plan that the Legislature believes will be workable. The Chairman of the County Legislature has been directed by Resolution to seek assistance in the plan development from FEMA, the NRC and the utilities. The same Resolution also rescinded the restrictions placed on County officials regarding improving the current plan. FEMA anticipates at this time that a workable Radiological Emergency Response Plan will be developed for Rockland County and appropriate officials trained in early 1983. FEMA staff has been most impressed with the recent efforts of the Rockland County officials to become active participants in the REP process. The efforts of the State personnel involved in developing compensating measures for any non-participating county and specific Standard Operating Procedures for six State agencies, that were prepared to assist in Rockland County, should be recognized.

III. PUBLIC MEETING CONCERNS

FEMA Region II, in its analysis of the public meeting transcripts, made a compilation of 46 representative concerns raised during the two public meetings held in Westchester and Orange Counties. Most of the issues or questions raised at either the two meetings had already surfaced during the plan review or the annual exercise. These concerns were forwarded to NYREPG on September 24, 1982. The State's responses were transmitted to FEMA in their letter dated October 1, 1982. FEMA's evaluation of the State response was furnished to the State on November 4, 1982. The State's responses to the FEMA evaluations were returned to FEMA in their letter dated November 16, 1982. The Region provided the State a disposition rating for each concern in its letter to the State on November 24, 1982.

In FEMA's disposition appraisal of the State's responses of the 46 representative concerns, a majority of the replies were found to be acceptable. At the meeting in Albany, New York, December 1st and 2nd, the State assured the FEMA representatives that the State staff is working actively to resolve unacceptable responses as soon as possible. As of this report, based on information verified to date, it is the judgment of FEMA that the remaining concerns expressed at the two public meetings do not reveal any new deficiencies. FEMA Region II will continue to assist the State and monitor the progress on unresolved public meeting concerns until corrective actions are completed.

IV PLAN REVIEW

FEMA proposed rule 44 CFR 350 establishes the operative process by which FEMA reviews and approves offsite radiological emergency preparedness plans (developed by State and local governments) for commercial nuclear power facilities. This process is an iterative process that involves significant time and effort by FEMA and the State and local governments. In simple terms, the process consists of the following:

- . FEMA Regional Office receives official set of state and local Plans from the Governor requesting "44CFR 350" approval.

- . FEMA and the RAC review the Plan and the State corrects identified deficiencies or provides a schedule for corrective actions.
- . FEMA observes and evaluates full scale exercise.
- . FEMA and the State participate in Public Meeting(s).
- . FEMA Region submits the Plan to Headquarters.
- . FEMA Headquarters and the Federal Radiological Preparedness Coordinating Committee (FRPCC) review the submittal.
- . FEMA approves or disapproves the Plan and sends a letter to the Governor and the NRC informing them of its action.

FEMA and the State of New York were actively engaged in this process when the request for an "Interim Finding" was made by the NRC.

- . July 21, 1981 - The State of New York applied for formal review and approval of the State Generic Plan.
- . August 18, 1981 - The State applied for review of the State Site Specific Plan for Indian Point and the four (4) county plans (Orange, Putnam, Rockland and Westchester) located in the 10-mile EPZ.
- . September 29, 1981 - FEMA provides FEMA/RAC comments on State Generic Plan to the State.
- . October 7, 1981 - RAC and State meet to discuss and clarify review comments on State Generic Plans.
- . October 22, 1981 - State responds to FEMA review comments on State Generic Plans.
- . December 31, 1981 - FEMA provides FEMA/RAC comments on the State Site Specific Plan and the four county plans for Indian Point.
- . March 3, 1982 - Joint full scale exercise conducted at Indian Point.
- . May 27, 1982 - FEMA issues Post Exercise assessment.
- . June 25, 1982 - The State of New York submitted to FEMA comments and a schedule of corrective actions on the plan deficiencies for the State Site Specific Plan and the four (4) county plans at Indian Point.
- . July 8, 1982 and July 22, 1982 - State of New York furnished FEMA with a number of plan revisions to the State Generic and site specific plans for Indian Point.
- . August 2, 1982 - FEMA provides NRC "Interim Finding" at the request of the NRC. Subsequent to these activities, FEMA and the State of New York have placed primary emphasis on correcting the deficiencies in the five (5) planning standards that were significantly deficient in the August 2, 1982, Interim Finding.

FEMA anticipates that the State will furnish plan revisions reflecting corrective actions for all deficiencies (including those identified as minor) in the near future as part of the continuing 44CFR 350 process. The process will continue with an exercise in March 1983 in which FEMA will evaluate the state of preparedness at Indian Point.

The plan review which follows outlines the current status of plan deficiencies based on the 44CFR 350 process that have been identified during the course of initial plan review, the annual exercise conducted on March 3, 1982 and the two public meetings held in July 1982. Also reflected in this plan review is the status of remedial actions taken during the period covered by the NRC 120 day letter to address the deficiencies in the August 2 Interim Finding.

Notwithstanding those uncorrected deficiencies previously noted in this report relating to Planning Standards J and P, the remedial actions that have been accomplished and those scheduled for completion as reflected in the plan review constitute offsite plans that will be feasible and capable of implementation. This assessment, however, is subject to verification at the exercise scheduled in March 1983.

In order to clarify the information contained in the plan review chart, the following explanation is provided:

Planning Standard: The alpha-numeric identifications relate directly to those designations and planning standard descriptions found in NUREG-0654/FEMA REP-1.

RAC Comments on State and County Plans: The comments appearing in this column on the State Radiological Preparedness Plan (REPP), "generic plan", are those made by FEMA Region II in a letter to NY State Disaster Preparedness Commission (DPC), dated September 29, 1981. The comments appearing in this column relating to State Site Specific and County Plans are those made by FEMA Region II in a letter to NYDPC, dated December 31, 1981.

State/County Response Action: The State/County comments appearing in this column are an updated compilation of those made by the State in various letters to FEMA Region II since October, 1981.

RAC Evaluation of State/County Responses: The RAC comments in this column represent the updated RAC evaluation of the State comments, as adjusted by those corrective actions taken by the State during the "120-day period."

Planning Standard (Appraisal): The appraisal for each of the planning standards (adequate, minor or significant deficiency) are the updated ratings for the State's compliance, overall, with each planning standard.

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Planning Standards Number	RAC Comments on State and County Plans	State (S)/County (C) Response Action		RAC Evaluation of State/County Response	Planning Standard
	o (S) State Generic o (SS) State Site Specific o (C) County				o Adequate o Minor or o Significant <u>deficiency</u>
A	ASSIGNMENT OF RESPONSIBILITY				Minor deficiency
Ala	(S) Implement Section 708	(S) Section 708 set forth in the Plan.	(S) Acceptable. State Senate Bill 7122, dated July 9, 1981 is inserted in State Plan. The Plan was submitted before the enabling legislation was passed. If the intent of the State is to have the current legislative enactment in the Plan, then the State should provide FEMA and all recipients of the Plan with the enacted legislation to replace the Bill version of the Act in the REP Plan.		
	(C) Implement Section 708. Clarify ingestion pathway EPZ planning responsibility.	(C) Will provide statement in Plan.	(C) Corrective action not complete until Plan revisions furnished.		
Alb	(S) Adequate (C) Clarify concept of operations	(C) Rebuttal of RAC comment.	(C) Unacceptable. Plan revisions need to articulate the implementation of revisions to article 2b.		
Alc	(S), (SS) & (C) Implement Section 708.	(S) & (SS) Will revise figures. (C) Will make Plan revisions.	(S) & (SS) Acceptable (C) See comment for A.l.a. above.		
Ald	(S) & (SS) Implement Section 708. (S) System of primary phone number distribution. (C) Clarify concept of operations with chart. Poor cross referencing.	(S) & (SS) Will make changes in Plan. (C) Cross references will be clarified.	(S) & (SS) Acceptable (C) See comment for A.l.a., above, Concept of operations comment ignored.		

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Planning Standard	RAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
	o (S) State Generic o (SS) State Site Specific o (C) County			
A1e	(S) & (SS) Adequate (C) Can individuals in charge of each organization be reached 24 hours a day?	(C) Agency personnel and back-ups provided in various procedures. Each agency has line of succession for disasters.	(C) Comment of capability to reach each individual in charge of each organization's response 24 hours a day, ignored. See comment for A.1.a. above.	
A2a	(S) & (SS) MDUs not finalized. Implement Section 708. Include USDA point of contact. (C) Implement Section 708.	(S) & (SS) Letter agreements being developed. Role of USDA will be added. (C) Agree with RAC comment.	(S) & (SS) Action not complete until Agreement Letters received. Plan revision showing USDA role not received. A conflict exists in assignment of responsibility. (C) See comment for A.1.a. above.	
A2b	(S), (SS) & (C) Adequate			
A.3.	(S) Agreement Letters missing. Clarification of USDA role and contact procedures. (C) Agreement Letters missing.	(S) State concurs in USDA contact procedure. (C) Will attempt to obtain Agreement Letters. If agreements obtained, will forward to FEMA.	(S) Draft page changes furnished to FEMA during the 9/22/82 bi-weekly meeting corrected the deficiency. Once plan revisions are formally transmitted to all plan recipients, action will be complete. (C) No positive commitment. Corrective actions not complete until Agreement Letters received.	
A.4.	(S) Adequate (C) Not addressed where referenced.	(C) Will correct cross reference problem.	(C) See comment for A.1.a. above.	

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
C	EMERGENCY RESPONSE SUPPORT AND RESOURCES			Minor deficiency
C1a	(S) Adequate	(S) The communications issue is being addressed.	(S) Shoreham plant not included in list of sites. Include listings of facilities and resources available to Federal support organizations. Is there a due date for request for resources?	
C1b	(S) Adequate			
C1c	(S) Back-up system only during work day. Facilities/resources specific for Federal use, as well as interagency communications (radio) mechanism not addressed. (C) Not address...	(C) State liaison officer to Federal agencies will provide information requested.	(S) No response from State. RAC comment still applies. (C) Response does not address criteria element.	
C2a	(S) (C) Adequate			
C.3.	(S) Not found where referenced. Arrangements-ingestion pathway lab analysis unsatisfactory due to time delay for processing.	(S) Corrections to be made. Paragraph pertaining to ingestion pathway lab analysis reworded.	(S) Response adequate.	
C.4.	(S) Agreement Letters missing for State support (i.e. USCG) (C) Agreement Letters are not available for all organizations listed	(S) MOUs will be listed where appropriate. MOUs between NFO and hospitals are in NFO site plan. Letter of Agreement with USCG will be listed in Plan (C) Sufficient resources identified. MOUs being sought.	(S) Letters of Agreement not received. (C) Rebuttal of RAC comment unacceptable. Description of resources needs to be articulated. See comment for A.1.a., above.	

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Planning Standard	RAC Comments on State and County Plans <input type="radio"/> (S) State Generic <input type="radio"/> (SS) State Site Specific <input type="radio"/> (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard <input type="radio"/> Adequate <input type="radio"/> Minor or <input type="radio"/> Significant deficiency
D	EMERGENCY CLASSIFICATION SYSTEM			Adequate
D.3.	(S), (SS) & (C) Adequate			
D.4.	(S) & (C) Adequate			

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Planning Standard	PAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard
	<ul style="list-style-type: none">o (S) State Generico (SS) State Site Specifico (C) County			<ul style="list-style-type: none">o Adequateo Minor oro Significant deficiency
E	NOTIFICATION METHODS AND PROCEDURES			Minor deficiency
E.1.	(S), (SS) No provision for notification of EPA and USDA - appropriate contacts. No provision for message verification. 			

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
	E.5. continued			
		<p>(S) FEMA was provided with copy of EBS Operational Area Plan during 9/8/82 bi-weekly meeting. The Plan is currently under review by FEMA.</p> <p>(S) All revisions necessitated by Interim Finding regarding PIO procedures will be incorporated or referenced in the State and County PIO procedures.</p> <p>(S) Upon the completion of the PIO procedures revisions, all State and County PIOs will be trained on such procedures.</p> <p>(S) The specific details of EBS activation for the four county areas, not reflected in the EBS Plan, (noted above) shall be detailed in each State and County Plan and provided to the lead EBS station.</p> <p>(S) Meetings will be arranged with EBS station management to explain the EBS system, its importance and its operation.</p>	<p>(S) Hudson Valley and Catskill, New York Operational Area 1 Plan has been received. Authenticator code envelopes are available on a need to know basis.</p> <p>(S) Procedures for PIOs are being revised.</p> <p>(S) PIO training on revised procedures has been completed.</p> <p>(S) New EBS procedures drafted by State were found to be acceptable.</p> <p>(S) Meetings with EBS stations have been held to explain EBS system to station management.</p>	
E.6.	<p>(S) Notification system not installed.</p> <p>(C) Adequate. What is actual date for installation of supplemental noti-</p>	<p>(S) Route alerting demonstrated. Alert and Notification will be accomplished by system of sirens and tone alert radios.</p> <p>(C) The utilities will provide documentation that the sirens, that were continue on next page.</p>	<p>(S) (for Indian Point only) Sufficient documentation has been received from the State/utility certifying that the siren system, now in place, is operable.</p> <p>(C) Installation complete. FEMA is reviewing original design for compliance with Appendix J, NUREG 0654/FEMA REP-1.</p>	

Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
E.6.	(C) continued			
	fication devices?	part of the original design, are in place and now work. Acceptance testing will come later.		
E.7.	(S) (SS) No draft messages (C) Draft messages neither adequate in number or content.	(S) Revised public working notices to be included in PIO procedures. All protective action orders and all actions affecting the public will be included in EBS messages. A system will be developed to insure the content of all EBS messages and the prompt and accurate transfer of such messages to the EBS stations. News releases will supplement information given in the EBS messages.	(S) Criteria for the content of EBS messages and news releases along with EBS messages have been developed	

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F	EMERGENCY COMMUNICATIONS			Minor deficiency
F.1.	(S) Adequate (C) Unclear as to what alternate communications method is for notification and activation of emergency response network. Who, by title, is responsible at each end of communications link?	(C) At 24-hour warning points, RECS, NAWAS, commercial phone and local government radio net exists. Identification of individuals responsible for radio links not adopted.	(C) See RAC evaluation for A.1.a.	
F.1.	(S) Adequate (C) The plans have not provided for communications between contiguous States and counties in the 50 mile EPZ. Provision for alternate communications links between States and counties not clearly defined.	(C) RAC comment not responsibility of county. Clarification requested on alternate communications links.	(C) NUREG 0654 requires this element to be addressed in "local plans." Reference to appropriate portion of State plan should be sufficient.	
F.1.	(S) No telephone numbers given for 3rd and 9th USCG Districts or CONRAIL, accordingly, it is not clear if the correct USCG office will be called, since there is no written agreement specifying point of contact. (C) Although plan states that there is to be communications with Federal agencies, there is no indication how this will be accomplished.	(S) Telephone numbers are on file with NYS ODP. Plan inclusion is not necessary. (C) FEMA responsible for notifying Federal agencies. If specific Federal agency support is requested contact will be made by commercial telephone.	(S) Adequate. However, action not complete. See RAC Evaluation of State comment for A.3. (C) This criteria element deals with emergency communications, not notification. Response not incorporated in plan revision. See RAC evaluation for A.1.a.	

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
F	(Continued)			
F.1.	(S) EOF to State or county communications or field assessment teams not addressed. (C) How will communications be maintained with field monitoring teams.	(S) Reference addresses State- County- NFO communications. (C) Communications with monitoring teams will be maintained by radio or telephone.	(S) No provisions for communications with RM team. EOF contact references incomplete. (C) Unacceptable. No discussion of procedures, radio equipment to be used. frequencies, etc. See RAC Evaluation for A.1.a.	
F.1.	(S) Adequate (C) Alternate individuals for each emergency response agency have not been designated. Also designated PIC should be included in Procedure 1, Att. 3. CERP.	(C) Where not designated, alternate individuals will be identified. PIO will be included.	(C) Vague reply. Will be able to judge compliance better when plan revisions are furnished.	
F.2.	(S) Adequate (C) Not clear from plans whether communications links for fixed and mobile medical support facilities exist. Specific information on methodology or equipment not discussed or provided.	(C) Plan will clarify communication links.	(C) Without plan revisions adequacy cannot be determined.	
F.3.	(S) No discussion of periodic testing of entire communications system. USDA point of contact needs to be added to test. (C) No provision for periodic testing of entire communications system.	(S) Awaiting information of FEMA's role. (C) Cross reference to drills and exercises will be made.	(S) FEMA furnished State requested information. The State's REPP revisions submitted 7/82, adequately address this element. (C) Main comment ignored. "Periodic test for entire communications system" must be address in plan.	

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G	PUBLIC EDUCATION AND INFORMATION			Minor deficiency
G.1.	(S) No specific samples of education program implementation provided. No schedule provided. USDA resources not mentioned. (C) As of plan review date, no public information brochure published. Implementation could not be evaluated. (Methodology for distribution, verification of receipt, and follow-up actions not discussed).	(S) Methods for program being developed. Methodology for further brochure distribution being developed. (C) Completed and transmitted to FEMA. (S) Need for second language brochure being considered. Survey to be conducted.	(S) & (C) The public education program has been improved by the use of radio public service announcements and newspaper ads. Newspaper ads and speakers' program will give information to residents on how to obtain the brochure, <u>Indian Point and You</u> . (S) The limited number of non-English speaking residents makes publication of the information brochures impractical. However, an outreach program has been started for non-English speaking residents.	
G.2.	(S) Could not locate where referenced (See comment on G.1., above).	(S) The public education program developed by the State, County and utilities will be implemented. Implementation of the program will satisfy the 120 day requirement. (S) Cross-reference corrections will be made.	(S) See RAC Evaluation of G.1.	
G3a	(S) (SS) Adequate (C) Adequate		Included in the Plan is additional information on arrangements and procedures for the Joint Media Center.	
G4a	(S) (SS) Adequate (C) Adequate			

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
G	(Continued)			
G4b	(S) (SS) Adequate (C) Specifics not provided as to how information will be exchanged among spokespersons.	(C) An outline of the public information program, news media briefings and notification of transients will be in the State and County Plans. Specific details of this program will be forwarded to FEMA upon completion (i.e. pamphlets, posters etc.). Correct cross-reference quoted.	(C) Additional information on public information, news media briefing and information programs for transients are being included in the plan.	
G4c	(S) Adequate (C) Specifics of rumor control operations not discussed. Plans do not reflect full understanding of rumor control. Information not provided on location or staffing of Rumor Control Centers.	(C) The "Oswego Model," tested and approved by all parties at the August 11th JAF Exercise will serve as a basis for the Rumor Control Program at Indian Point. This program will be tailored and then added to each State and County Plan	(C) Adequate procedures have been developed and plan revisions to reflect the new procedures are being made to deal with rumors.	
G.5.	(S) No specifics provided for annual briefing of news media. (C) Plan merely assigns responsibility. Detailed program not presented in Plans.	(S) At the Oct. 7, 1981, RAC meeting, this item was found to be acceptable. (C) Meeting held with media prior to exercise. Detailed program being developed.	(S) In light of agreement reached at the 10/7/81 meeting and provisions provided in plan revisions dated 7/82 this element is adequately addressed. (C) Original RAC comment applies.	

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H	EMERGENCY FACILITIES AND EQUIPMENT			
H.3.	(S) (SS) & (C) Adequate			
H.4.	(S) (SS) & (C) Adequate			
H.7.	(S) & (SS) State has no iodine detection capability. What resources will be utilized upon a State declaration? Please specify location and accessibility to these resources. No field capability by choice in vicinity. (C) Specify installation date of radiological monitoring equipment. No discussion of adequacy of equipment calibrations and security from damage. Identify duties of trained radiological monitoring personnel. Who will be allowed to accompany NFO monitoring teams? Describe chain of command to be used by multi-agency monitoring teams; method of communication of data to immediate supervisor thru chain of command to final accident assessment personnel. Specify lab equipment to be used in sampling analysis and its location. If State responsibility, reference appropriate portion of State Plan. "Radiation monitoring kits for county field teams" are really	(S) & (SS) State relies on licensee for field iodine measurements with local and Federal support. The 708 report addresses funding for monitoring. (C) The Reuter - Stokes monitoring equipment is a licensee responsibility. It is not planned to have county personnel accompany NFO teams. Multi-agency monitoring teams are not utilized. The State laboratory equipment is listed in the State portion of the Plan. Updated listing of county monitoring equipment will be included in County Plan. Evaluation symbols will be supplied.	(S) & (SS) Response adequate. What is time frame for State's developing capability? (C) If State relies on county, county plans must give information. Revisions to the Plan for this and Item 1.7 must be reviewed before adequacy can be determined.	

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	<ul style="list-style-type: none">o (S) State Generico (SS) State Site Specifico (C) County			<ul style="list-style-type: none">o Adequateo Minor oro Significant deficiency
H.7.	(C) (Continued)			
	support items which are not available in sufficient quantity for team members. Evaluation symbol missing in Table III - 3, Rockland CRERP.			
H.10	(S) & (C) Adequate			
H.11	<p>(S) Equipment lists are part of State wide inventory. Information on maintenance and accessibility of kits necessary. Unclear if radio communications can take place due to differences in operating radio frequencies. (Part III, Sect. II p. 14-19). Specify titles of persons responsible for maintenance and distribution of equipment referenced.</p> <p>(C) Identification of emergency kits inadequate. Procedures are incorrectly referenced. In Rockland County, no radiological equipment available as of this report. All plans deficient in identifying use of personnel, transportation and communications equipment with respect to various emergency response actions on Plan.</p>	<p>(S) DEC equipment is kept at Dept. offices. ODP inventory listings are at ODP office. Frequencies will be included after completion of survey, statement concerning maintenance will be added.</p> <p>(C) Attachment 17 will be reviewed and clarified. Some plans had missing pages. Cross reference will be corrected. Plan will be revised to incorporate Rockland County equipment.</p>	<p>(S) Response adequate</p> <p>(C) The adequacy of the response cannot be evaluated until the changes are furnished.</p>	

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant o Deficiency
III	(Continued)			
H.12	(S) Adequate (C) Plans do not specify when field data will be analyzed and where sample media will be coordinated.	(C) Each county's field data will be transmitted to its respective EOC and the EOCs will relay the information to the EOP and State. Plans will be reviewed and clarified to reflect this.	(C) Until plan revisions are reviewed, this element remains inadequately addressed in the county plans.	

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Planning Standard	RAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant deficiency
I	ACCIDENT ASSESSMENT			Minor deficiency
I.7.	<p>(S) & (SS) Not addressed where referenced. If State has no capability, plan should so state and specify what field monitoring data State intends to use for its evaluation of various stages of accident. Plan not specific on how data will be attained.</p> <p>(C) Unclear if monitoring team instructions developed in cooperation with NFO and DOE, the two organizations that will be doing the actual monitoring. Separate SOPs necessary for each type of monitoring equipment. Maps necessary for monitoring teams that will provide information on locale for personnel unfamiliar with locations.</p>	<p>(S) & (SS) See response to H.7.</p> <p>(C) The field monitoring teams, resources, activation and operations will be reviewed and expanded as appropriate.</p>	<p>(S) & (SS) The NFO's monitoring capabilities and procedures should be reflected in the State Plan, until the State develops its own capabilities. Such data would be required if the State had an established monitoring program. Since the RAC does not review the NFO plan this information should be made part of the State's Plan.</p> <p>(C) Adequacy of response cannot be assessed until changes are provided.</p>	
I.8.	<p>(S) & (SS) Specifics are not provided where referenced. No specific facilities or resources allocated for Federal (FRMAP) use. Assembly points, command and control, off-duty notification not addressed. Discuss order of visitation to off-site monitoring locations and decision process for this selection. Are teams familiar with locations of fixed monitoring location?</p>	<p>(S) & (SS) Attachment 5 refers to the licensee capabilities. This comment addresses items evaluated by NRC in their review of the licensee emergency procedures.</p>	<p>(S) See evaluation of I.7.</p> <p>(SS) Attachment 5 is not specific concerning the State's monitoring capabilities within the EPZ. To what extent are the State's monitoring resources utilized; or is the licensee also responsible for beta, gamma, air particulate and TLD monitoring and sample collection?</p>	

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Planning Standard	RAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard
	<ul style="list-style-type: none"> o (S) State Generic o (SS) State Site Specific o (C) County 			<ul style="list-style-type: none"> o Adequate o Minor or o Significant deficiency
I.8	(Continued)			
	(C) As of review date of Plans, capabilities for this element lacking in all counties. Procedure 3, Attachment 2 does not satisfy criteria. Transportation arrangements for monitoring teams not discussed. No evidence of back-up communications. No discussion of communication for field monitoring teams. Monitoring equipment lists.	(C) Cross reference will be corrected. See I.7. for additional comments.	(C) The adequacy of the response cannot be evaluated until the corrections are furnished.	
I.9.	(S) & (SS) State does not have any field monitoring capability for iodine. If such capability is anticipated it should be indicated.	(S) & (SS) Refer to comment in H.7.	<p>(S) & (SS) See evaluation of H.7.</p> <p>(C) Since State has elected to depend on county for this data, the county plans should fully address this function. At this time, they do not.</p>	

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J	PROTECTIVE RESPONSE			Significant deficiency
J.2.	(S) (SS) Adequate (C) No provision for evacuation routes and transportation for onsite individuals to suitable offsite location.	(S) Review and revise as necessary in coordination with licensees. (C) Provisions to be included in next revision to Westchester and Putnam Plans Clarification requested from FEMA on last comment.	(C) FEMA has furnished State requested clarification. To date, no corrective actions provided to FEMA.	
J.9.	(S) (SS) Plan unclear as to who will make decision to implement protective measures: State or Counties. Both State and County Plans contain statements they will make decision to implement a particular action. State heavily dependent on assistance from utilities and Federal government.	(S) (SS) Clarification of responses to A.I.M. and A.I.D. should resolve element.	(S) (SS) Adequate.	
J.10	(S) (SS) Adequate (C) None of maps referenced depict pre-selected radiological sampling and monitoring points. Maps are not found where referenced.	(C) Necessary maps found in App. J. (Fig. J-1) Cross-reference will be corrected.	(C) Maps are in Fig. S-1. However requirement of use of 0654 Table J-1 for use of sampling location designators is not met.	

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J	(Continued)			
J.10	<p>(S) Adequate</p> <p>(SS) Maps as described could not be located in plan.</p> <p>(C) Maps as required in App. 4, NUREG-0654, could not be located in CRERPa. Sector maps should be superimposed over ERPA maps to facilitate coordination of protective measures with contiguous counties in Plume EPZ and with State.</p>	<p>(S) Maps with population distribution by ERPA are available for use at State and County EOCs. REPG will provide information on EOC population maps to RAC.</p> <p>(C) Information in tabular form in App. 6. Population by ERPA displayed on maps.</p>	(S & C) Maps with population information by ERPA are available in counties' EPCs.	
J.10	<p>(S) Adequate</p> <p>(C) Means for notifying all segments of transient and resident population not adequate. (See comment for element E.5)</p>	(S) Copy and dissemination schedule for posters and telephone book insert will be forwarded to FEMA upon completion.	(C) Posters and a telephone book insert have been prepared to get information to transients.	
J.10	<p>(S) Adequate</p> <p>(C) Determination to determine protecting mobility persons do not address persons who are institutionalized.</p>	<p>(S) Revise State and County Plans to reflect the program to identify & evaluate such persons.</p> <p>(C) The brochure has a mail-in post card to identify these people. Each county will be reviewed.</p>	(S) & (C) Each county EOC is manned by a representative of the respective county agency responsible for special problems of the mobility impaired. If evacuation is recommended these agencies will respond. Additional public information programs will be used to inform mobility impaired persons of methods of receiving assistance.	

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J	(Continued)			
J.10	<p>(S) Criteria calls for use of radio-protective drugs. Alternate means for protecting emergency workers not discussed. Five recommendations made in 9/29/81 letter.</p> <p>(C) See State comment.</p>	<p>(S) At October 1, 1981 meeting RAC members agreed that documentation for the State police decision does not belong in the plan.</p> <p>(S) State police now calls for the provision and dissemination of KI to emergency workers and special populations. This policy will be included in the State Plan.</p>	<p>(S) (C) The State and counties have adopted the FDA recommendation on use of KI for emergency workers and captive populations.</p>	
J.10	<p>(S) See comment on J.10.e., above</p> <p>(C) See State comment.</p>	(S) Same as J.10.e.	(S) (C) In RAC Evaluation for J.10.e.	
J.10	<p>(S) Adequate.</p> <p>(C) No commitment referenced for public and private bus operators to transport personnel, if so ordered. How many operational buses available? In each garage?</p>	<p>(S) Compensating measures will be developed and included in plans for the provision of supplemental personnel.</p> <p>(SS) When this element is revised in the county Plans the information will be referenced in the site specific plan.</p> <p>(C) Negotiations are continuing.</p>	<p>(S) In RAC Evaluation for P.1</p> <p>(C) It is uncertain whether bus drivers used for evacuation in Westchester County will respond; however, to plan for that contingency the State has developed a compensating measure which calls for deployment of military (State National Guard) forces to operate unmanned buses pursuant to a Gubernatorial Emergency Declaration. In a worst case situation, i.e. an evacuation required for all sectors and no response</p>	(See attachment)

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J.10 g (Attachment)			<p>of any private drivers, the time required for the National Guard to respond cannot be judged acceptable. The State has made every effort to develop a workable compensating measure but the physical limitations of bringing military personnel to the Indian Point site increase possible evacuation times. Since all of the protective actions evacuations depend most heavily on timely local actions, until additional measures are taken at the local level, this item of the planning standard remains significantly deficient.</p>	

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J	(Continued)			
J.10	(S) Adequate (C) Some relocation centers may be less than 5 miles beyond boundary of Plume EPZ, namely in Orange County.	(C) Relocation centers identified by FEMA have been examined and found to be more than 5 miles beyond the Plume EPZ.	(C) All relocation centers are outside the 10 mile Plume Exposure EPZ.	
J.10	(S) (SS) Projected traffic capacities of evacuation routes under emergency conditions, could not be located where referenced. (C) Projected traffic capacities of evacuation routes under emergency conditions could not be located where referenced in any of the CHERPs.	(S) Will be provided when received from consultant. (SS) See comment to J.10.1., of county plans. (C) Traffic capacities were submitted to FEMA.	(S)(SS) FEMA has reviewed document furnished by REPG, entitled, <u>Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone</u> , prepared by Parsons Brinkerhoff, Quade & Douglas Inc., November 1981. Appendix E addresses road capacities for several different types of roadways. The capacities are then presented for car ramps of different design. The calculations appear to be based on accepted transportation engineering principals and methodologies. However, FEMA cannot accept this data as being approved and promulgated by the State. Corrective action will require plan revisions reflecting traffic capacity data being furnished to FEMA for approval. (C) See RAC evaluation for State and Site Specific response.	
J.10j	(S) Adequate (C) Adequate			

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J	(Continued)			
J.10	(S) Adequate (SS) Insufficient information to determine adequacy. (C) Insufficient information in CRERPS to make determination.	(SS) See comment to J.10.k. of county plans. (C) Cross reference, Law Enforcement Procedure, Attachment 1, Public Works has responsibility for debris clearance and emergency repair (See p.17-A).	(SS) & (C) Plans are being revised to give additional information on means for clearing impediments on evacuation routes.	
J.10	(S) Adequate. (SS) Evacuation Time Estimates depict data by sector and distance from NFO. Data as required by Appendix 4, NUREG 0654, not provided. (C) Same comment as for State Plan.	(SS) Appendix 4 was transmitted to FEMA (C) Appendix 4 was transmitted to FEMA	(SS) & (C) The document provided to FEMA, entitled <u>Methodology to Calculate Evacuation Travel Time Estimates for the Indian Point Emergency Planning Zone</u> marked "DRAFT" and prepared by Parsons, Brinckerhoff, Quade & Douglas, Inc. discusses this element. Although it addresses the criteria of Appendix 4, it cannot be considered a part of the plan. Plan revisions incorporating data contained herein are necessary.	
J.10a	(S) Chain of command between State and counties must be clarified. Specify to whom State is recommending protective actions. Indicate location of State Commissioner of Health during each phase of the emergency.	(S) Standard Operating Procedures for collection and transmission of field data will be developed. County EOC staff will be trained.	(S) SOPs and training schedules will be reviewed when received. Effectiveness of training will be evaluated at next exercise.	

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J	(Continued)			
J.11	(S)(SS) Contamination detection procedures, maps for recording survey and monitoring data, lists of facilities regularly processing food products originating in ingestion pathway, but located elsewhere, could not be located (No provisions for ingestion pathway protective measures, where portions of NY State are in the 50 mile EPZ of other reactor sites - CT Yankee, Millstone, VT Yankee and Yankee Rowe, and Oyster Creek). Have any estimates of ingestion pathway PAG potential dose been incorporated into projected public dose for protective action decisions? Discuss provisions that have been made for decontamination of food stuffs.	(S) Deficiencies identified in RAC member field trip to State Agriculture and Markets Office on 9/10/82, will be corrected, namely: maps showing dairy farm locations in 50 mile EPZ, surface water inventory for Indian Point, maps showing location of produce farms in 50 mile EPZ.	(S) Adequate information on surface water inventory and location of produce and dairy farms has been furnished to complete information requirements for ingestion pathway protective action.	
J.12	(S) Specify arrangements for monitoring evacuees and equipment available at relocation centers. Criteria not addressed where referenced and could not be found elsewhere in plan. (C) Not clear what purpose form serves. Methodology for registering and performance of evacuee monitoring at relocation centers in host areas could not be located in plan.	(S) Procedures for monitoring evacuees will be developed. Plan revisions will clarify which State term (reception center, congregate) is synonymous with the NUREG term (relocation center). Equipment requirements will be developed. (C) Registration form is provided as Attachment 8, to Procedure 6. Procedures are being reviewed for needed changes.	(S)(SS) Procedures have been developed for monitoring capability at Congregate Care Centers and for transmission of field data to decision makers. (C) Referenced portion of plan still does not give a clear explanation of the purpose the form serves.	

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K	RADIOLOGICAL EXPOSURE CONTROL			
K.3.a.	<p>(S) Plan discusses what is planned for future but does not give dates of expected capability nor does it discuss interim procedures or what instruments and capabilities presently exist. What are the locations of personnel monitoring centers?</p> <p>(S) How will dosimeter charging be accomplished? Plan does not address program for permanent record devices for State workers.</p> <p>(C) No mention of personnel permanent dose recording devices in any plan. Specify where dose records will be kept and how long. Not clear if dosimeters are available on a 24 hour basis. Dose record form needs revision to be acceptable.</p>	<p>(S) Permanent dosimeters (TLDs) and self-reading pocket dosimeters (O-SR) with chargers have been ordered. The capability for 24-hour operation (i.e., shift changes) will be demonstrated during the next exercise.</p> <p>The incorporation of personnel monitoring stations in State plan might lead to confusion.</p> <p>(S) The counties will clarify the issue of dosimeter charging in their plan.</p> <p>(C) Standardization by use of State form for local emergency personnel will be incorporated in the next revision of county plans.</p>	<p>(S) The State has agreed to obtain immediately the permanent record dosimeters required for a response at Indian Point and have started a phased acquisition of low range self-reading dosimeters. High range civil defense dosimeters will be used in the interim.</p> <p>(S) Draft procedure submitted to FEMA on 11/19/82 during bi-weekly meetings were found acceptable. Action is not considered complete until plan revisions are formally transmitted to all plan recipients.</p> <p>(C) County did not respond to RAC comment.</p>	
K.3.b.	<p>(S) This element will be satisfied when post emergency storage location of record is stated.</p> <p>(C) None of the CRERPs provide for dosimetry activities by organization for emergency workers.</p>	<p>(S) The plan will be amended to require that copies of all personnel monitoring records relating to the emergency will be submitted to NYS DOH for review and permanent storage.</p> <p>(C) Refer to K.3.a., above.</p>	<p>(S) (C) See RAC evaluation for K.3.a.</p>	

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K	(Continued)			
K.4.	(S) Adequate (C) Adequate			
K.5.	(S) Specify minimum action level for personnel decontamination, equipment, soil and other surfaces. (C) Procedures do not satisfy specific instrumentation to be utilized for measurement. CRERPs do not state at what level of contamination follow-up is necessary. Discussion of contamination records is insufficient. Action levels for decontamination are erroneously referenced.	(S) At RAC meeting on 10/7/82, this element was found to be acceptable. The comment relating to decontamination of equipment, foodstuffs, soil and other surface material was withdrawn. (C) Will review with consistency with State procedures.	(S) Adequate. (C) Revisions in decontamination procedures are being made in the plan and in the State training manual.	
K.5.	b (S) Are the personnel monitoring centers the decontamination facilities? Where are they located? Discuss monitoring equipment to be used to determine need for and effectiveness of decontamination. Discuss monitoring equipment. If first aid kits available, indicate storage locations. If not, indicate anticipated availability and future storage locations.	(S) See response to K.3.a. for location of PHC. Monitoring equipment to be used will be discussed in Procedure 6 to be added to cross-reference. The comment concerning identification of medical facilities was agreed to be withdrawn at RAC meeting on 10/07/81. Comment on first aid kits is a suggestion and is not required by this element.	(S) & (C) The State is developing numeric requirements for both trained personnel and equipment for use at monitoring and decontamination facilities and this information will be included in the plans on completion.	

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K	(Continued)			
X.5.1.	contd.	<p>(S) Procedures will be revised to reflect a single distinct step. The procedure will state that if that step does not bring the contamination down to the established level the person will be referred to another facility for further decontamination treatment.</p> <p>(S,C) Decontamination procedures are being reviewed and modified. Personnel at appropriate locations will be trained in new methods.</p> <p>(S,C) The plans will describe methods for disposing of solid wastes.</p> <p>(C) Will review and revise as appropriate.</p>	<p>(C) Revisions are being made in the plan and State training manual with regard to disposal of contaminated wastes generated by decontaminating activities.</p>	
	<p>(C) Specify means for radiological decontamination of emergency personnel, wounds, supplies, instruments and equipment and waste disposal. Describe medical treatment arrangements for personnel who have been contaminated or exposed to high levels of radiation. Discuss decontamination stations, especially locations, facilities available, and waste disposal means.</p>			

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K	(Continued)			
K.5.	contd. (C) Discuss sources of teams needed to monitor emergency workers and evacuees to determine need for decontamination and to assure results. (C) Explain or discuss medical or radiological authorities to which contaminated personnel will be referred for additional consultation or treatment.	(C) Emergency worker staffing and equipment data for these facilities (PMC, CC and RC) will be submitted to FEMA. (C) No response.	(C) FEMA awaits receipt of data addressing these details. (C) FEMA is awaiting response.	

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L	MEDICAL AND PUBLIC HEALTH SUPPORT			Minor deficiency
L.1	(S) No details regarding qualified hospitals to handle contaminated individuals. (C) Unable to locate in CRERPs, any facilities with radiological evaluation and treatment capabilities where referenced.	(S) New York State has requests received from forty seven hospitals throughout the State information on their capabilities to treat potentially contaminated injured patients. A list of these hospitals is included in Part III, Section II, pages 12, 12a, 12b, and 12c. The New York State Department of Health's Office of Health Systems Management is examining the adequacy of these hospitals capabilities. (C) Lists of hospitals with radiological treatment capabilities as reviewed by DOH-OHSM.	(S) State response found adequate. FEMA will verify capability of listed hospitals to treat contaminated, injured patients during early part of calendar year 1981. (C) See comments A.1.a. above.	
L.3	(S) Not available in plans furnished for review	(S) Same as for L.1.	(S) Additional information is required to satisfy criteria element, to include: type of facility and capacity and any special radiological capabilities.	
L.4	(S) No agreements found to establish commitments to transport radiological accident victims to medical support facilities. (C) Insufficient information furnished to determine adequacy of arrangements.	(S) Information will be included when available. (C) Require clarification from FEMA.	(S) Means of transportation and MOUs for transporting off-site victims not present. (C) See footnote 1 to Planning Standard L, page 69, 0654/FEMA REP-1. The guidance contained in the referenced documents should be detailed in the county plans.	

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M	RECOVERY AND REENTRY PLANNING AND POST ACCIDENT OPERATIONS			Minor deficiency
M.1.	(S) No indication what a radiation monitoring program consists of. (C) Although procedures described insufficient information furnished.	(S) During the October 1, 1981 meeting RAC concurred in the State's position that monitoring programs initiated during the response phase will continue until acceptable levels are reached. (C) County staff will provide support to State on request. County plans will be revised.	(S) Response adequate. (C) See comment A.1.s.	
M.3.	(S) Adequate			
M.4.	(C) Plan does not establish method for periodically estimating total population exposure.	(S) During the October 1, 1981 meeting present wording in the Plan was found acceptable.	(S) Revisions to the 0654 cross reference have not been received.	

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N	EXERCISES AND DRILLS			Minor deficiency
N.1.a.	<p>(S) Plan does not meet criteria of "exercise shall be conducted as set forth by NRC-FEMA Rules".</p> <p>(C) Conflict exists between II.B.3.a which calls for an annual exercise for County and State and Procedure 12, Section 3.2.1, in Westchester, Orange, and Rockland CRERPs and Procedure 11 Section 3.2.1, Putnam CRERP, which calls for test every 3 years. There is cross reference problem in Orange CRERP. Plans do not state that exercise shall be conducted as set forth in NRC/FEMA Rules.</p>	<p>(S) No response.</p> <p>(C) Will be reviewed and clarified and made consistent with Federal guidelines.</p>	<p>(S) Criteria not met for conducting of exercise by NRC-FEMA rules.</p> <p>(C) See comment A.1.a. above.</p>	
N.1.b.	<p>(S) No provision for an exercise once every 6 years between 6:00 PM and midnight and midnight and 6:00 AM.</p> <p>(C) No provisions in plans for exercise to be conducted under various weather conditions or for unannounced exercises. Qualifications to be an observer should be listed. Cross references need to be added.</p>	<p>(S) No response</p> <p>(C) Will review and revise as appropriate.</p>	<p>(S) No provision for exercise once every six years between 6:00 PM and midnight and midnight and 6:00 AM.</p> <p>(C) See comment A.1.a. above.</p>	

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N	(Continued)			
N.2.a.	(S) Adequate (C) Plans do not contain specific procedures for conducting tests. Also, a cross reference problem.	(C) Will review and revise to make consistent with State plan. County plans appear to conform to 0654.	(C) See comment A.1.a. above.	
N.2.c.	(C) Plans do not specify whether medical drills to be performed as part of annual exercise. If not, so state and provide procedure outlining step by step, how drill is to be carried out.	(C) Pre-exercise material will state whether a medical drill will be part of exercise.	(C) Reply not adequate. The criteria element calls for this material to be addressed in the plans.	
N2.d.	(S) Criteria will be satisfied when the word "may" on page F-2, Part III, Section I, Item 2, line 2 is corrected to "shall" as stated in NUREG-0654. (C) Specify when mechanism to implement results of exercise and drill will be implemented.	(S) The State does not agree with comment. Personnel who normally collect water or milk samples as an ongoing activity should not have to collect samples during an annual drill. Personnel required to collect emergency samples who normally do not collect samples should participate in periodic drills. All State samples will be analyzed by the DOH Radiological Sciences Institute which is nationally recognized and routine testing of lab during an annual drill seems unnecessary. (S) Comment not relevant to this section.	(S) Response adequate.	

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N	(Continued)			
	There is no discussion of collection of and analysis of sample media and provisions for records keeping.			
N.3.a	(S) Adequate (C) The CRERPs should include an explanation of how exercises and drills will be carried out.	(C) This material is provided prior to annual exercises in accordance with FEMA/NRC guides. Material should not be in plan.	(C) We agree that specific material relating to each exercise and drill should be provided prior to the event. However, the response does not adequately address the criteria element. It does not contain a discussion of the process by which scenarios are developed, in general, for all exercises and drills.	
N.3.b.	(S) Adequate (C) See comments for N.3.a.	(C) See comments for N.3.a.	(C) See FEMA evaluation for N.3.a.	
N.3.c.	(S) Adequate (C) See comments for N.3.a.	(C) See comments for N.3.a.	(C) See FEMA evaluation for N.3.a.	
N.3.d.	(S) Adequate (C) See comments for N.3.a.	(C) See comments for N.3.a.	(C) See FEMA evaluation for N.3.a.	
N.3.e.	(S) Plan needs narrative summary describing conduct of exercises and drills.	(S) Plan will be amended to include statement that each exercise will attempt to conduct as many actual activities as possible and within the resources available for the exercise.	(S) Response adequate.	

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N	(Continued)			
N.3c	(C) See comments for N.3.a.	(C) See comments for N.3.a.	(C) See RAC evaluation for N.3.a.	
N.3.f.	<p>(S) More detail necessary on arrangement and advance material to be provided to official observers.</p> <p>(C) See comments for N.3.a.</p>	<p>(S) The Plan will be amended to include statement that observers will be qualified and will be provided additional training if required. All observers will be briefed prior to the exercise. Rating sheets and a detailed list of activities to be observed will be provided. Completed observation reports will be returned no later than one week after completion of the exercise. Observation sheets will be changed for exercises as required.</p> <p>(C) See comments for N.3.a.</p>	<p>(S) Response adequate</p> <p>(C) See RAC evaluation for N.3.a.</p>	
N.4.	<p>(S) Incorporate USDA point of contact in alert procedures.</p> <p>(C) Method not described by which State and local governments will observe, evaluate and critique exercise. Discuss deadlines for incorporating results of formal evaluation into the CRERPs.</p>	<p>(S) Reference E.1. above.</p> <p>(C) See Section 3.2.4 and 3.2.5, of Procedure 12.</p>	<p>(S) Response adequate.</p> <p>(C) Little detail or commitment in these sections.</p>	

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	o (S) State Generic o (SS) State Site Specific o (C) County			o Adequate o Minor or o Significant deficiency
N	(Continued)			
N.5.	<p>(S) Part III, Section I, Procedure F-5 (4.2, 4.3) merely repeats word for word the contents of element N-5 in NUREG-0654. NO "means" are established.</p> <p>(C) Insufficient information furnished to determine whether means exist for evaluating observer and participant comments. Plans do not assign responsibility for implementing corrective actions. Management controls to ensure corrective actions are implemented as result of acceptance of observer comments not discussed.</p>	<p>(S) Upon completion of an exercise the evaluator and observer comments will be reviewed and included in an after action report. A portion of the report will highlight the lessons learned. Plan revision arising from lessons learned will be executed. Corrective actions will be administered by the REPG.</p> <p>(C) Will review and revise as appropriate.</p>	<p>(S) Person responsible for implementing corrective actions? Management controls for implementation of corrective actions?</p> <p>(C) See RAC evaluation for A.1.a.</p>	

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Planning Standard	RAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard
	o (S) State Generic o (SS) State Site Specific o (C) County			o Adequate o Minor or o Significant deficiency
0	RADIOLOGICAL EMERGENCY RESPONSE TRAINING			Minor deficiency
0.1	(S) Adequate (C) Insufficient information to evaluate element. List all response agencies and training courses that cover activities for which they are responsible. No detailed lesson plans. Present training status of emergency response personnel should be specified. Timetable for bringing training levels of emergency personnel up to readiness levels should be furnished. Attachment 4 should include 1982 list of courses instead of 1981. Without personnel assigned to specific duties one cannot determine training needs by position and who will conduct training.	(C) REPG has recently taken over training of State and local REP. This section is being reviewed and revised to conform to RAC guidelines	(S) With whom will State agencies coordinate their training efforts? (C) See comment A.1.a. above.	
0.1.b	(S) Adequate (C) Inadequate where referenced. Each offsite response organization shall participate in receiving training. Also, training for mutual aid organizations.	(C) See response to 0.1.	(C) See comment A.1.a. above.	
0.4 a thru 0.4 j.	(S) Each organization shall establish a training program for instruction and qualification of response personnel who will implement radiological emergency response programs in a number of categories.	(S) State and local agencies are re-evaluating and identifying all the areas that need training improvement. REPG is responsible to evaluate the effectiveness of training. Training program will require	(S) Establish retraining schedule. Annual County and State reports are acceptable.	

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Planning Standard 0 Adequate 0 Minor or 0 Significant 0 deficiency	RAC Comments on State and County Plans 0 (S) State Generic 0 (SS) State Site Specific 0 (C) County	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	
0	(Continued)			
0.4.		"hands on" training. Retraining will be incorporated. Training schedules will be provided on a periodic basis.		
0.4.	. contd.	(C) See response to 0.1.	(C) See comment A.1.a. above.	
(C)	See State comment.			
0.5	(S) Plan does not provide for annual retraining of personnel with emergency response responsibilities.	(S) Plan will be amended to read "annual refresher training."	(S) Response adequate.	

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Planning Standard	RAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard
	<ul style="list-style-type: none"> o (S) State Generic o (SS) State Site Specific o (C) County 			<ul style="list-style-type: none"> o Adequate o Minor or o Significant deficiency
P	RESPONSIBILITY FOR PLANNING EFFORT			Significant deficiency
P.1.	<p>(Revised as of Interim Finding)</p> <p>(S) Rockland County's non-participation in the four county plan raises a question as to decision maker capability to respond in an emergency.</p> <p>(C) Training of individuals responsible for planning effort was not addressed where cross-referenced in Orange, Rockland and Westchester plans.</p> <p>(C) The Putnam plan references training of individuals involved in the planning effort. However, plan does not contain a program for training individuals.</p>	<p>(S) Rockland County decision makers will be trained on radiological emergency responses necessities. Compensating measures will be outlined in the State Plan.</p> <p>(C) Will revise as required.</p>	<p>(S) Rockland County Legislature has disavowed the plan formally submitted to FEMA in August, 1981 for review. The county is currently in the process of preparing a plan of its own. Although the State has developed compensating measures in draft, there are questions regarding viability of deployment times. State Agency procedures, in general, lack specificity.</p> <p>(C) Original RAC comment for Orange and Westchester still apply. For Rockland, in light of the county's pursuit of their own plan, which has not been completed to date, no determination can be made at this time.</p> <p>(C) Original RAC comment applies</p>	
P.2.	<p>(Revised as of Interim Finding)</p> <p>(S) Rockland's non-participation in the exercise and planning effort requires compensating measures to be taken.</p>	<p>(S) In the absence of a Rockland plan, compensating measures will be included in the State plan to insure adequate emergency response in the county.</p>	<p>(S) The Rockland officials and staff are participating in training and have had a table to exercise of its plan. Until new plan is reviewed, this element will remain inadequate.</p>	

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Planning Standard	RAC Comments on State and County Plans	State (S)/County (C) Response Action	RAC Evaluation of State/County Response	Planning Standard
	<ul style="list-style-type: none"> o (S) State Generic o (SS) State Site Specific o (C) County 			<ul style="list-style-type: none"> o Adequate o Minor or o Significant deficiency
P	(Continued)			
P.2.	(C) Although county officials responsible for administration of CEREPs is stated in each plan, it is unclear whether or not he has authority for radiological emergency response planning.	(C) Will revise as required.	(C) See comment for A.I.s., above for the Orange, Westchester and Putnam plans. See P.1 and P.2 for Rockland Plan.	
P.3.	(Revised as of Interim Finding) (S) & (SS) In the absence of a Rockland County Plan, there is an inherent lack of capability to update such a plan. (C) Who, by title, is responsible in each county by agency, for maintaining and updating emergency plans.	(S) & (SS) In the absence of a Rockland County Plan, provisions will be included in the State Plan for updating Rockland response requirements. (C) Will revise as required.	(S) & (SS) See comment for P.1., above. (C) See comment on A.I.s., above for the Orange, Westchester and Putnam plans. See P.1 and P.2 for the Rockland Plan.	
P.4.	(Revised as of Interim Finding) (S) & (SS) In the absence of a Rockland County Plan, there is an inherent inability to keep the plan current. (C) Adequate.	(S) & (SS) In the absence of a Rockland County Plan, provisions will be included in the State Plan for keeping Rockland response requirements current.	(S) & (SS) See comment for P.1. and P.2., above.	

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Planning Standard	MAC Comments on State and County Plans o (S) State Generic o (SS) State Site Specific o (C) County	State (S)/County (C) Response Action	MAC Evaluation of State/County Response	Planning Standard o Adequate o Minor or o Significant o deficiency
P	(Continued)			
P.5.	(S) Adequate (C) Adequate			
P.6.	(S) Adequate (C) CRPPs do not contain a detailed listing of supporting plans and their sources.	(C) Supporting plans will be listed.	(C) See comment for A.I.s., above for the Orange, Putnam and Westchester Plans. See P.1 and P.2. for the Rockland Plan.	
P.7.	(S) Adequate (C) Adequate			
P.8.	(S) Adequate (C) Plans are inadequately cross-referenced as stated in many preceding comments.	(C) Cross references will be corrected.	(C) See comment for A.I.s., above for Orange, Putnam and Westchester Plans. See P.1. and P.2. for the Rockland Plan.	
P.10	(S) Adequate (C) Plans merely restate wording in NUREG-0654, rather than describing method for accomplishing this criterion.	(C) Numbers will be checked quarterly and log kept for verification.	(C) For the Orange, Putnam and Westchester Plans, procedure needs to be incorporated into the plans. See P.1. and P.2. for the Rockland Plan.	