

# STATE OF NEW YORK DEPARTMENT OF PUBLIC SERVICE

THREE EMPIRE STATE PLAZA, ALBANY 12223

## PUBLIC SERVICE COMMISSION

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Chairman

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HAROLD A. JERRY, JR.  
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RICHARD E. SCHULER  
ROSEMARY S. POOLER



DAVID E. BLABEY  
Counsel

JOHN J. KELLIHER  
Secretary

March 4, 1983

James P. Gleason, Esq.  
Chairman  
Administrative Judge  
513 Glimoure Drive  
Silver Springs, MD 20901

Frederick J. Shon  
Administrative Law Judge  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

Dr. Oscar H. Paris  
Administrative Judge  
Atomic Safety and Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

James A. Laurenson  
Administrative Law Judge  
Atomic Safety & Licensing  
Board  
U.S. Nuclear Regulatory  
Commission  
Washington, DC 20555

In the Matter of  
Consolidated Edison Company of New York  
(Indian Point, Unit 2)  
Power Authority of the State of New York  
(Indian Point, Unit 3)  
Docket Nos. 50-247-SP and 50-286-SP

Dear Administrative Judges:

I have previously supplied to the Board and the parties packets of Radiological Off-Site Emergency Plan Revisions dated July 7, 1982 and January 14, 1983. I inadvertently omitted to provide State Plan revisions supplied to the Federal Emergency Management Agency on July 22, 1982. I request that my delay in providing this material be excused and that this material be incorporated into the New York State's Proposed Exhibit 6 (State Plan Revisions since June of 1982). This omitted material contains very few plan revisions and incorporation of this document in our exhibit will not be burdensome to the parties. Moreover, if the

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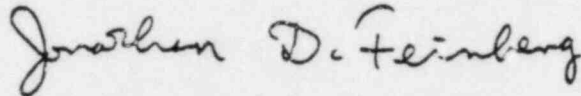
James P. Gleason  
Frederick J. Shon  
Dr. Oscar H. Paris  
James A. Laurenson

-2-

March 4, 1983

State's witnesses are examined during the week of March 21, as I have previously proposed, then the submission of this material will comply with the time limitations of 10 CFR §2.743(b).

Respectfully submitted,



JONATHAN D. FEINBERG  
Staff Counsel

• Appearing for New York State  
Energy Office  
STANLEY KLIMBERG  
General Counsel

Enc.

NEW YORK STATE  
DISASTER PREPAREDNESS COMMISSION  
Public Security Building  
State Campus  
Albany, N.Y. 12226



William C. Hennessy  
Chairman

MG Vito J. Castellano  
Secretariat

David Axelrod, M.D.  
State Coordinating Officer



July 22, 1982

Mr. Frank P. Petrone  
Director  
Region II  
Federal Emergency Management Agency  
26 Federal Plaza  
New York, NY 10278

Dear Mr. Petrone:

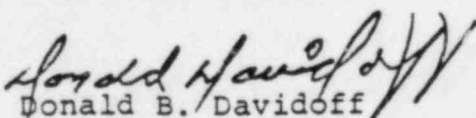
Attached please find revisions to, and further comments on, the Indian Point site specific portion of the New York State Radiological Emergency Preparedness Plan.

These revisions reflect the December 31, 1981 RAC comments, the results of the March 3, 1982 Indian Point Exercise, the review of the four county portions of the Plan and our further experience with this program.

To assist the RAC members in their review of these revisions, an instruction chart is attached which sets forth the changes and identifies the RAC comment which prompted the new material. Each revised page is dated -- new material is identified by a vertical line. Those RAC comments which do not require Plan revisions are addressed in the second attachment to this letter.

The Disaster Preparedness Commission continues to be vitally concerned about the Radiological Emergency Preparedness Program, and is committed to a plan which: meets Federal criteria, State and local expectations and, most importantly, protects the health and safety of our residents.

Sincerely yours,

  
Donald B. Davidoff

for  
William C. Hennessy  
Chairman  
Disaster Preparedness Commission

Atts  
cc: RAC Members

New York State Radiological Emergency Preparedness response and appropriate revised State Plan pages specific to the Indian Point Site Specific RAC comments.

Please update your copy of the State Plan as indicated below:

<u>REMOVE</u>	<u>INSERT</u>	<u>APPLICABLE RAC COMMENT</u>
IP-19, IP-20 IP-21, IP-22	IP-19, IP-20 IP-21, IP-22 Rev. 7-82	A.1.c
IP-49	IP-49 - Rev. 7-82	H-7, I-7
II-7	II-7 - Rev. 7-82	I-8
IP-15	IP-15 - Rev. 7-82	J-9

monitoring equipment, and assures that the current public notification system is operable.

The Department of Environmental Conservation provides equipment and manpower to assist in communications and monitoring the environment, in case of a radiological emergency.

The Department of Health assists local health agencies, provides laboratory services, and maintains monitoring equipment.

### 3. MONITORING POTENTIAL RADIOLOGICAL EMERGENCIES

The off site radiological monitoring capabilities of State agencies in areas around nuclear facilities are primary to an adequate Prevention/Mitigation program. Typical examples of fixed environmental monitoring equipment both in use and in planning (in the State of New York) ranges from air particulate monitors, I-131 monitors and thermoluminescent dosimeters, to environmental radiation monitoring systems associated with central processing and data communication interface equipment for remote data acquisition.

Presently the State relies on the licensee for off-site field iodine monitoring with support from local and federal response organizations.

#### STATE AGENCIES

The Office of Disaster Preparedness (ODP) has limited radiological capabilities and receives meteorological information which may be used to assist the Department of Health in the assessment and evaluation of a radiological emergency. ODP will also collect local radiological monitoring information through its district offices.

The Department of Environmental Conservation operates a Statewide Radiation

### 2.3 Emergency Response Planning Areas (ERPAs)

The plume exposure EPZ for the Indian Point Site is divided into 46 emergency response planning areas (ERPAs). (See map Figure 6.) The ERPAs were developed using the following criteria:

Major population areas have been preserved or grouped;

Boundary definitions have been simplified (e.g., municipal boundaries, major roads) for clarity;

The size and orientation of the ERPAs are adequate to respond to various levels of accident severity including but not limited to radii of approximately 2, 5 and 10 miles and sectors of approximately 22½° to 45°. The effect of meteorological patterns have been taken into consideration.

Protective action response options will be implemented according to ERPA. Since emergency instructions to the public are based upon individual ERPAs, protective actions can be accomplished in stages. Attachment IP-2 lists each ERPA and its boundaries.

### 3.0 Assumptions: Emergency Response Planning Basis

#### 3.1 State Responsibility

Under the auspices of the Disaster Preparedness Commission, it is the responsibility of the Commissioner of Health of the State of New York to recommend the implementation of protective actions which will prevent or minimize radiation exposure to the population in the event of a radiological emergency. Where no State declaration of disaster emergency is issued. If such a declaration is issued, the Department will direct the implementation of protective actions. The Department of Health will provide technical guidance, assessment and evaluation.

The Division of Military and Naval Affairs, Office of Disaster Preparedness (ODP) will coordinate State agencies' actions and intercounty response activities. State agencies may provide assistance in the form





of personnel, equipment, supplies, services and facilities, when local responses are insufficient to cope with the effects of the emergency.

### 3.2 Local Responsibility

In the event of a radiological emergency it is the responsibility of each County Executive to provide resources (equipment and personnel) to respond in accordance with their respective county Radiological Emergency Response Plan and to implement protective action response options recommended or directed as set forth in 3.1.

### 3.3 Nuclear Facility Operators (NFO) Responsibility

The NFO (Consolidated Edison Company of New York, Inc. or the Power Authority of the State of New York) will provide initial notification of a radiological emergency or potential emergency situation to the State and appropriate County Warning Points. The NFO will provide monitoring (Attachment 5 IP) and assessment and evaluation for both onsite and offsite radiological considerations and will recommend appropriate protective actions. The NFO will also provide an Emergency Operations Facility (EOF) to be staffed by the NFO, Federal, County and State technical personnel.

### 3.4 Federal Responsibility

The responsibilities of the Federal government regarding radiological emergencies are divided primarily among three agencies--the Federal Emergency Management Agency (FEMA), the Nuclear Regulatory Commission (NRC), and the Department of Energy (DOE).

The U.S. Regulatory Commission (NRC) is responsible for approving on-site emergency plans and in the event of a radiological emergency ensure that appropriate emergency plans have been implemented and for conducting investigations associated with a radiological emergency.



The Federal Emergency Management Agency (FEMA) is responsible for supervising offsite planning, and coordinating this Plan with NRC and making recommendations to NRC as to whether State and County plans meet requirements of Federal Government guidelines. In addition FEMA coordinates all civil emergency planning and assistance functions for Federal agencies. FEMA will coordinate the Federal agencies involvement and Federal assistance programs in accordance with their Master Plan.

The U.S. Department of Energy (DOE) is responsible for providing emergency operations to assist State and local governments in protecting the health and safety of individuals, the public and the environment in the event of a radiological emergency. This is accomplished by means of the Federal Radiological Monitoring & Assistance Plan (FRMAP) which provides for the use of Federal capabilities for radiological monitoring and assessment.

#### 4.0 Concept of Operations

In the event of a radiological emergency at the IPNPS, the following tasks must be accomplished in order to protect health and safety of the public:

- Assess the scope and magnitude of the emergency.
- Evaluate protective actions and decide on the best option.
- Implement the appropriate protective option(s).

The successful accomplishment of these three tasks depends upon the carefully orchestrated cooperation among County, State and NFO emergency response organizations based on their respective resources and responsibilities. The first two tasks are technical in nature and

Upon declaration of disaster emergency the Governor shall direct the Chief Executives to take the appropriate protective action.

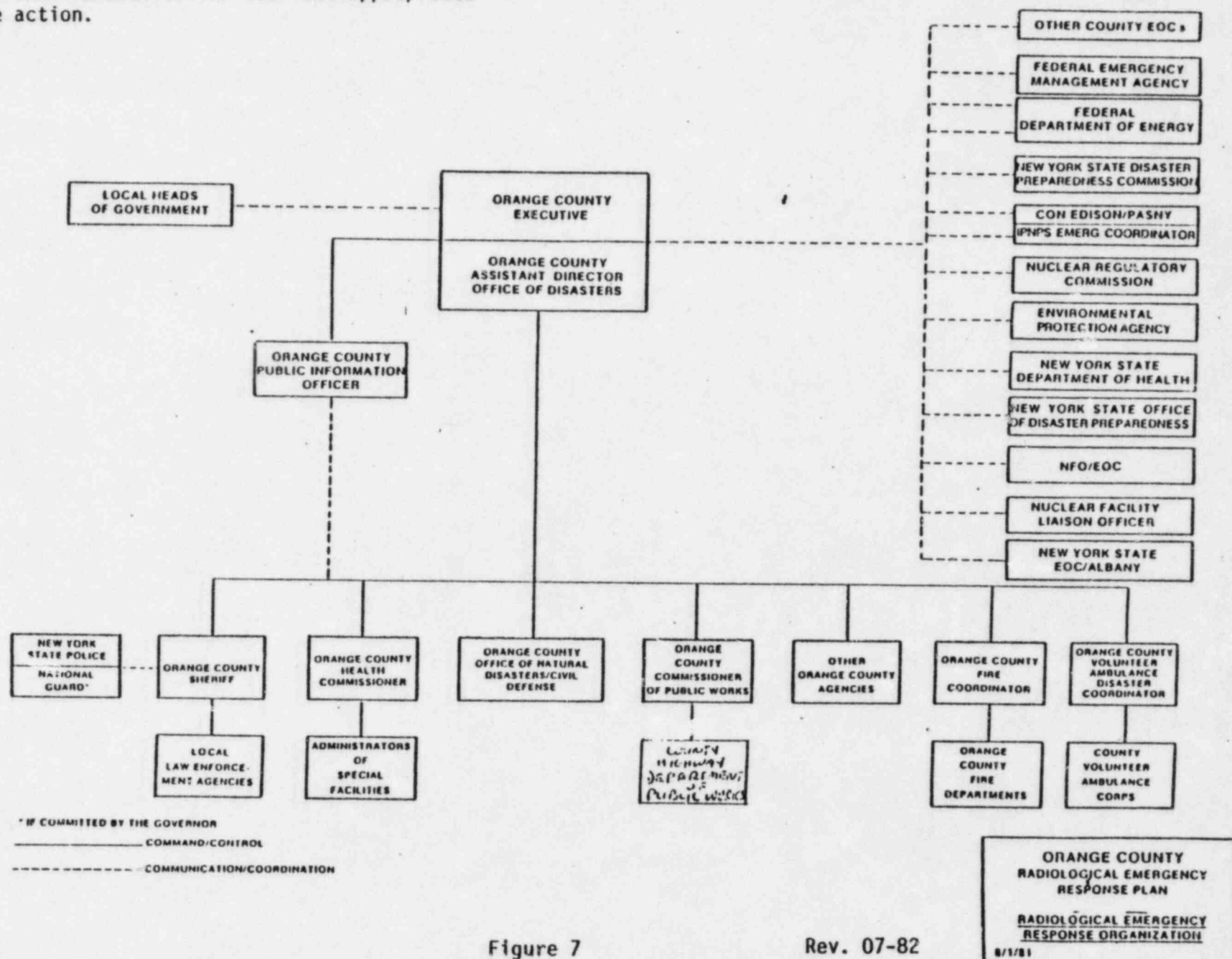


Figure 7

Rev. 07-82

Upon declaration of disaster emergency the Governor shall direct the Chief Executives to take the appropriate protective action.

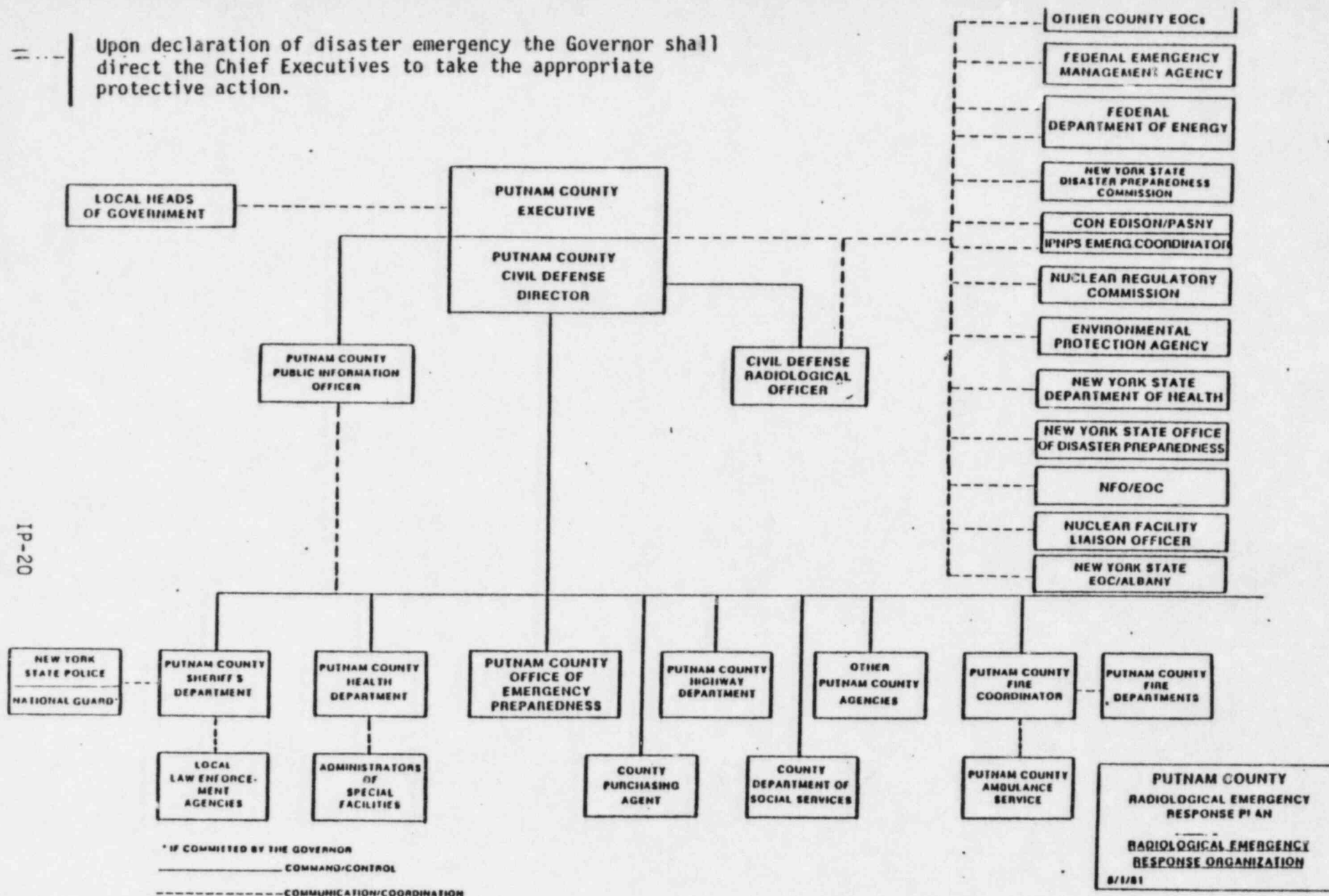
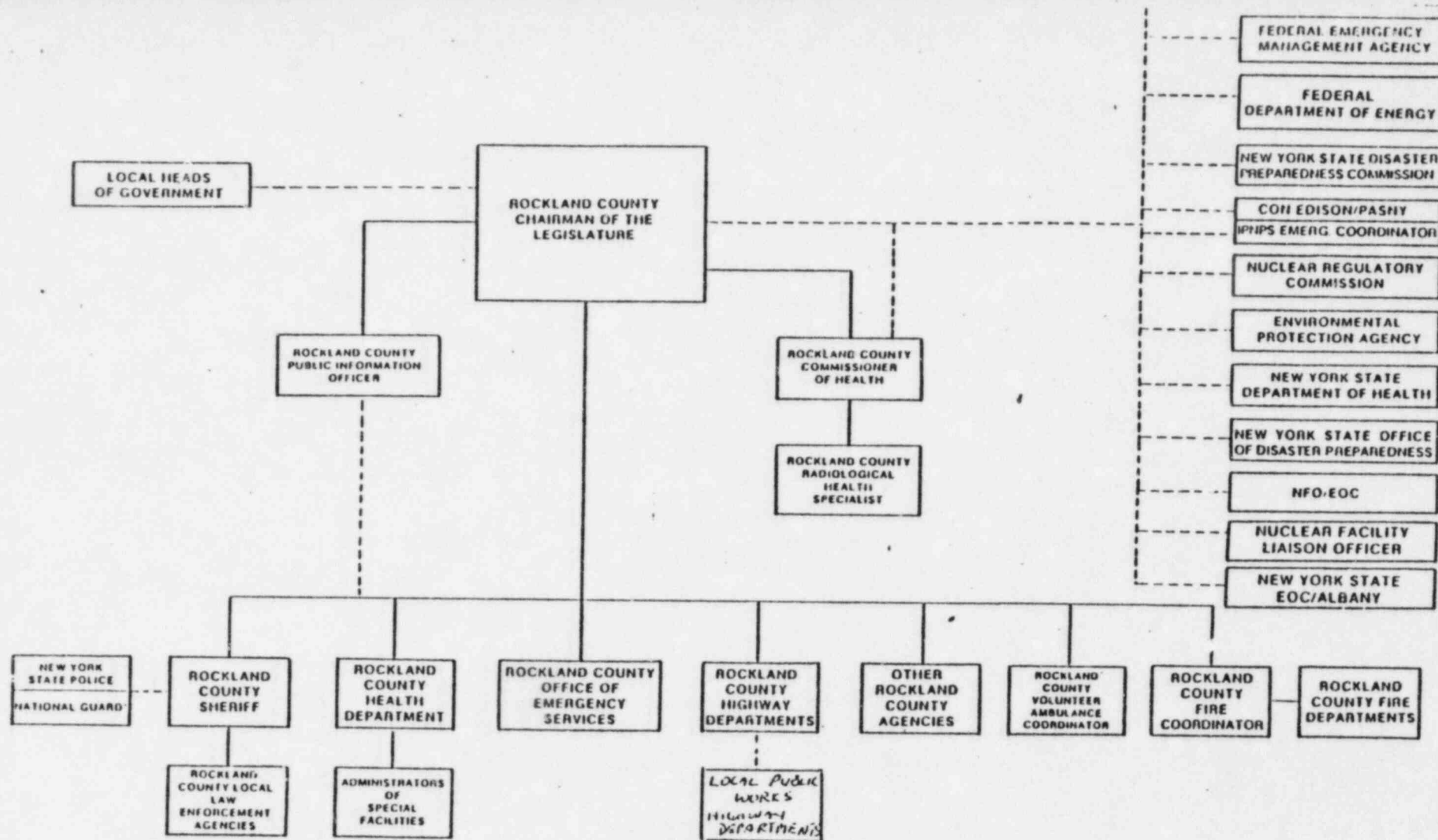


Figure 8



\* IF COMMITTED BY THE GOVERNOR  
 \_\_\_\_\_ COMMAND/CONTROL  
 - - - - - COMMUNICATION/COORDINATION

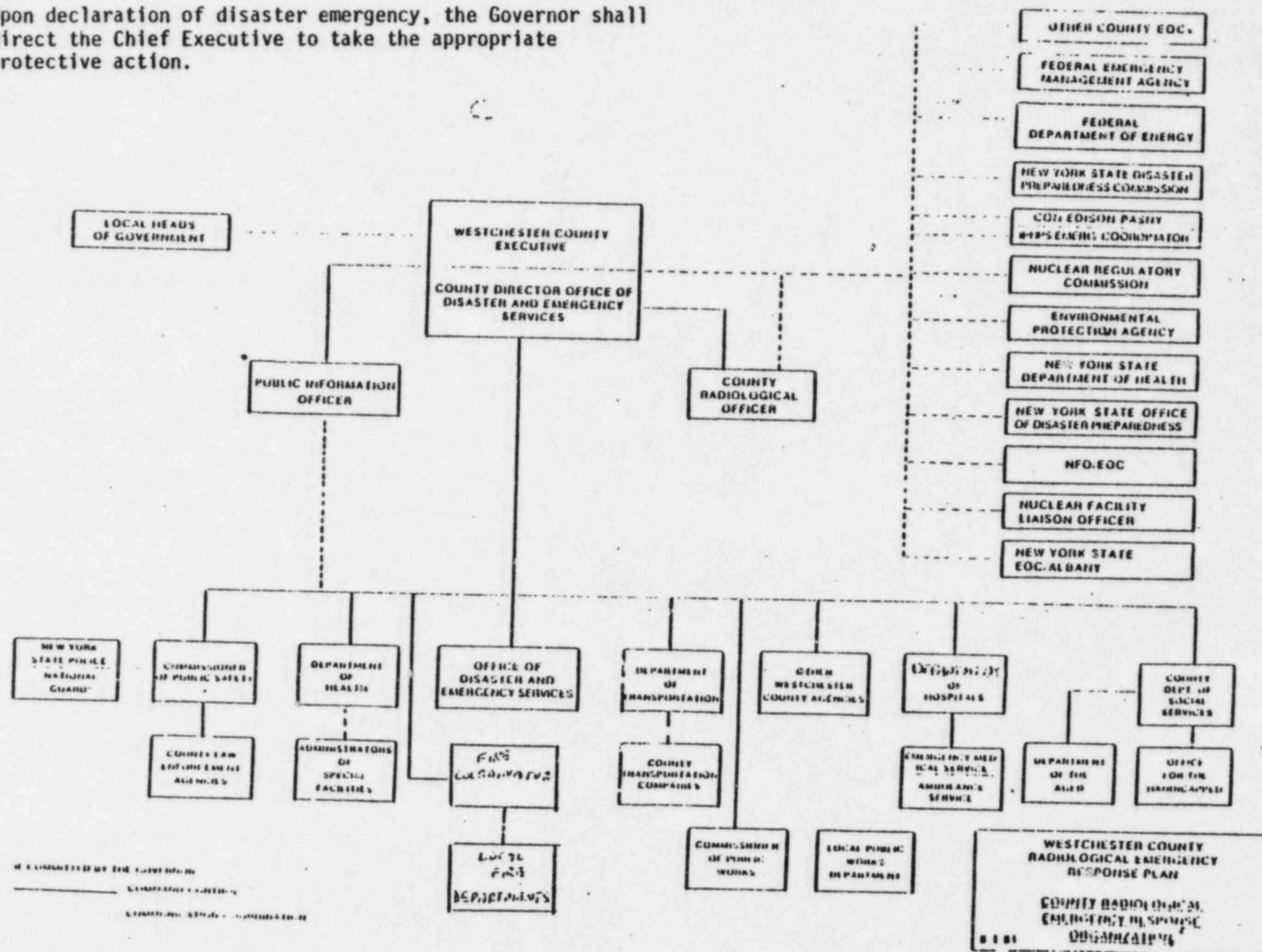
ROCKLAND COUNTY  
 RADIOLOGICAL EMERGENCY  
 RESPONSE PLAN  
 RADIOLOGICAL EMERGENCY  
 RESPONSE ORGANIZATION  
 8/1/81

Upon declaration of disaster emergency the Governor shall direct the Chief Executives to take the appropriate protective action.

Figure 9

Rev. 07-82

Upon declaration of disaster emergency, the Governor shall direct the Chief Executive to take the appropriate protective action.



IP-22

Figure 10

Rev. 07-82



Emergency Response Activities  
Response Organization Primary Authority

Emergency Response Activities	New York State	Orange County	Putnam County	Rockland County	Westchester County
Direction and Control	Commissioner of Health	Executive	Executive	Chairman of the Legislature	Executive
Notification of Public	Director of ODP	Executive	Executive	Chairman of the Legislature	Director of Disaster and Emergency Services
Communications	Director of ODP	Assistant Director Office of Disaster	Civil Defense Director	Sheriff	Director of Disaster and Emergency Services
Health and Sanitation Services	Commissioner of Health	Commissioner of Health	Deputy Commissioner of Public Health	Commissioner of Health	Commissioner of Health
Law Enforcement and Traffic Control	State Police	Sheriff	Sheriff	Sheriff	Commissioner of Public Safety
Public Works	Department of Transportation	Commissioner of Public Works	Civil Defense Director	Highway Superintendent	Commissioner of Public Works
Public Information/Information	State PIO	PIO	PIO	PI)	PIO
Reception/Congregate Care Centers	Director of ODP	Department of Social Services	Department of Social Services	Department of Social Services	Department of Social Services
Social Services	Director of ODP	Department of Social Services	Department of Social Services	Department of Social Services	Department of Social Services
Accident Assessment	Commissioner of Health	Assistant Director Office of Disaster	Civil Defense Director	Radiological Health Specialist	Commissioner of Health

Figure 11 IP

Emergency Response Activities (Cont'd)

Response Organization Primary Authority

Emergency Response Activities	New York State	Orange County	Putnam County	Rockland County	Westchester County
Protective Response Evacuation	Commissioner of Health	Commissioner of Health	Civil Defense Director	Chairman of the Legislature	Commissioner of Health
Radiation Exposure Control	Commissioner of Health	Commissioner of Health	Civil Defense Director	Commissioner of Health	Commissioner of Health
Evacuation	Director of ODP	Assistant Director Office of Disaster	Civil Defense Director	Chairman of the Legislature	Director of Disaster and Emergency Services
Bus Transportation	Department of Transportation	Assistant Director Office of Disaster	Civil Defense Resources Office	Transit Coordinator	Department of Transportation
Fire and Rescue Service	Department of State (FP&C)	Fire Coordinator	Fire Coordinator	Fire Coordinator	Fire Coordinator
Emergency Medical Services		Assistant Director Office of Disaster	Fire Coordinator	Volunteer Ambulance Disaster Coordinator	Emergency Medical Services

accordance with the Site Emergency and Implementation Procedures. He will account for all personnel and has the authority to assign and delegate responsibilities to all members of the operating staff and emergency organization. He will also promptly notify, or cause to be notified, the Unit 2 Control Room and ensure that all necessary contacts with local, State, and Federal authorities are made.

#### 5.1.3 Inter-Utility Agreement/Responsibility

Agreements have been made between PASNY and Consolidated Edison to have facilities, equipment, and personnel made available to each other for backup capabilities in the event of a radiological incident. Letters of agreement defining responsibilities and providing for mutual aid have been exchanged by the operators.

#### 5.2 New York State Direction

The statutory authority for executing the State Radiological Emergency Preparedness Plan belongs to the Disaster Preparedness Commission (DPC) in accordance with New York State Law, the DPC provides direction and control for all State disaster management activities and coordinates with local authorities. The Commissioner of Health has been assigned the responsibility for the overall radiological emergency preparedness program within the State. The Department of Health will assess and evaluate the emergency situation and recommend implementation of appropriate protective actions to County officials, in those cases where no State declaration of disaster emergency is issued. If such declaration is issued the Department will direct the implementation of protective actions. The State ODP is the agency responsible for the coordination of State agency response activities and through the Southern District Office of ODP for inter-county response activities.

#### 5.3 Local Government Direction

The statutory authority for directing emergency response activities in the Counties of Orange, Putnam, Rockland and Westchester belongs

to the respective County Chief Executives/Chairman of the County Legislature. The implementation of each county's Radiological Emergency Response Plan is the responsibility of the County official designated by County Chief Executive/Chairman of the County Legislature. The following officials have been designated for each county:

- Orange County - Assistant Director, Office of Natural Disaster and Civil Defense
- Putnam County - Director, Office of Civil Defense
- Rockland County - Deputy Director, Office of Emergency Services
- Westchester County - Director of Disaster Preparedness and Emergency Services

#### 5.4 Indian Point Emergency Response Facilities

During normal plant operations and events in the Notification of Unusual Event class, which have a low potential for increasing risk to the public safety, the plant is managed and operated from the control room.

For the declaration of Alert, Site Emergency or General Emergency classes the Control Rooms for IP Units 2 and 3 will be activated and perform the functions of the Emergency Operation Facility (EOF) until those functions are shifted to the EOF, if appropriate.

With the declaration of a Site Area Emergency or General Emergency, the activities of the Emergency Director and the Assessment Team will primarily be coordinated from the near-site EOF. The EOF is a dedicated emergency control center located in the Consolidated Edison Indian Point Service Center at the Indian Point Site.

There are special emergency phones with unlisted numbers which allows the State Department of Health to communicate directly with the Emergency Director. These phones are located at the IP Unit 2 Control Room, IP Unit 3 Control Room and the Emergency Operations Facility.

The National Warning System (NAWAS) dedicated land line has been installed in both IP Units 2 and 3 Control Rooms. This line permits immediate and direct communication with the Westchester and Putnam County Warning Points as well as the Westchester County EOC and the ODP Southern District. Through message relay from the Westchester County Warning Point, the State Warning Point, and the Orange and Rockland County Warning Points may also be contacted using this system. A local government radio network exists between the ODP Southern District and Orange County. State agency radio communicating capability including State Police, Environmental Conservation, Fire, and Transportation are available in the ODP Southern District EOC, when activated.

#### 6.0 Initiation of Response Activities

##### 6.1 Emergency Classifications

The Nuclear Regulatory Commission has established, and this Plan adopts, the following four classes of emergencies for nuclear power plants:

- Notification of Unusual Event
- Alert
- Site Area Emergency
- General Emergency

For further explanation see Part I Section III of this Plan.

Examples of initiating conditions for these classes at the Indian Point Site are listed in Attachments IP 3 and IP 4.



## 6.2 Notification

### 6.2.1 Plume Exposure EPZ

Upon detection of an initiating condition for any of the four emergency classes at either Indian Point Units 2 or 3, the Watch Supervisor/Emergency Director will immediately notify the State and County Warning Points using RECS.

The initial notification message from the NFO shall contain the following information (refer to Part III Section 1, Procedure B, Radiological Emergency Data Form).

- Name and location of facility;
- Name of person making report;
- Backup emergency phone number (if appropriate);
- Class of emergency and brief description;
- Whether a release is taking place or not;
- Whether protective measures may be necessary;
- Potentially affected population;
- Weather condition, wind speed and direction.

During normal business hours (generally weekdays 8:30 a.m.-4:45 p.m.) the State Department of Health will be an immediate recipient of the NFO notification and will obtain additional information from the NFO at that time by means of RECS. During non-business hours, the State Warning Point will immediately relay the notification message to the State Department of Health, the Radiological Emergency Preparedness Group and State Office of Disaster Preparedness according to State alerting procedures. The State Department of Health will contact the appropriate Emergency Director by the most expeditious manner (RECS, commercial telephone) to obtain additional emergency information including:

- Location of incident and name and telephone number (or communications channel identification) of caller;

- Date/time of incident
- Class of emergency
- Type of actual or projected release (airborne, waterborne, surface spill), and estimated duration/impact times;
- Estimate of quantity of radioactive material released or being released and the points and height of releases;
- Chemical and physical form of released material, including estimates of the relative quantities and concentration of noble gases, iodines and particulates;
- Meteorological conditions (wind speed, direction stability, precipitation, if any);
- Actual or projected dose rates at site boundary; projected integrated dose at site boundary;
- Projected dose rates and integrated dose at the projected peak and at 2, 5 and 10 miles, including sector(s) affected;
- Licensee emergency response actions underway;
- Recommended emergency actions, including protective measures, and
- Prognosis for worsening or termination of event based on plant information.

The Westchester, Rockland, Putnam and Orange County Civil Defense or Emergency Services representatives will call the affected Indian Point Emergency Director to obtain additional information, if not already provided to them by the State DOH. Each representative will

then inform their respective County Chief Executive/Chairman of the County Legislature of the situation.

The State Department of Health will request the State Warning Point to notify appropriate State agencies in accordance with the State Communications and Warning Implementing Procedures (Part III - Section 1B, Communications/Warning). The State Department of Health will insure that the additional information has been received by the county officials. See Figures 7-10 for County Radiological Response Organizations.

#### 6.2.2 Ingestion Pathway EPZ

Upon determination of a radiological emergency that may impact on the ingestion pathway, the State ODP will notify potentially affected jurisdictions. This notification will be made to County/City/State Warning Points by means of commercial telephone. In critical situations, the National Warning System (NAWAS) will be available for notification to affected Warning Points. The following jurisdictions are within the Ingestion Pathway EPZ only and notification will be made by State ODP to New York State jurisdictions and to New Jersey, Connecticut and Pennsylvania Authorities for counties located in those states, for detail and procedures refer to Page III-39 and Procedure H.

##### New York State

- Dutchess County
- Ulster County
- Sullivan County
- Nassau County
- Suffolk County
- New York City (all boroughs)

radiological support personnel designated by appropriate authority will initiate action to assess the accident as soon as possible and determine the exposure to the offsite population. Assessment initially depends on instrumentation with alarms or those which have readout in the Control room. It is important to make an early assessment of the potential exposure and have it available for the State and County officials. The assessment process involves accident evaluation to determine release rates, use of meteorological data to determine diffusion patterns and measurement of the specific activity of noble gases and iodines so that whole body and thyroid exposure can be estimated.

Presently the State relies on the licensee for offsite field iodine monitoring with support from local and federal response organizations.

Release rates are determined from effluent monitor readings or field survey while noble gas, I-131, and I-133 concentrations are measured on effluent samples taken by a chemical technician. Meteorological data is evaluated so that the appropriate diffusion overlays can be selected and aligned on the base map. The overlays are used to determine site boundary concentration and dose rates. Dose rates at other points of interest are evaluated using the overlay and release rate data and/or offsite monitoring results from fixed air sampling sites, TLD's and emergency sampling sites.

Dose assessment results will be evaluated in relation to the PAG's and data about the plant surroundings to recommend protective actions to State and County officials. The Atmospheric Release Advisory Capability (ARAC) and the Meteorological Information Dose Assessment System (MIDAS) meteorological/radiological computer programs are also available for assistance in assessment and evaluation. Specific information on ARAC and MIDAS is provided in the County Radiological Emergency Response Plans (Part IV).

Refer to Part I, Section III for a general discussion of the assessment and evaluation of protective action response actions.

Additional specific information on assessment and evaluation procedures is contained in Part III, Section IH, Assessment/Evaluation.

The description of the Indian Point onsite and offsite survey/sampling monitoring program is shown in Attachment G IP.

## 6.6 Public Information and Notification

### 6.6.1 Release of Public Information

The State, PASNY, Consolidated Edison and each county have a designated spokesperson for the release of information to the press, radio, and TV on the status of the incident. The primary spokesperson for information on the public health impact of any radiological releases and on any required protective actions is the State Public Information Officer.

### 6.6.2 Coordination of Public Information

The State Commissioner of Health and the local Chief Executives/Chairmen of the County Legislature are responsible for issuing public announcements on public health and safety, relating to a radiological emergency. County and utility public information officials and the State Public Information Officer shall consult with one another prior to issuing releases, to insure that factual and consistent information will be available for reporting to the public, in a timely manner, at both State and local levels. Specific requests for information received by local jurisdictions, regarding public health and safety items not covered in joint State-local liaison, will be referred to the State PIO (refer to Procedure C).



### 6.6.3 Public Notification

Notification of the public residing within the plume exposure EPZ will be accomplished with a system of outdoor sirens. Individuals in areas that are not accessible to siren notification (such as park areas) will be notified by other means such as route alert by law enforcement and fire personnel.

The siren is a "signal" for the public to tune to an EBS radio or television station for specific emergency information and instructions. System design for the siren network for plume exposure EPZ is contained in County RERPs.

### 6.6.4 Contents of Press/News Releases

To facilitate the release of accurate and consistent information to the public, sample press/news release are prepared.

The preparation of any press releases should be a result of PASNY, Consolidated Edison staff, County, and State coordination and will incorporate the following specifics:

- Identification of the sources issuing the information;
- Identification of the facility experiencing the emergency and the time the incident began;
- Identification of the communities or geographic areas affected by emergency;
- Brief description (in layman's terms) of the type of emergency;
- The nature of the hazard, particularly in terms of potential risk or absence thereof, to the affected populace;
- Instructions with regard to specific protective measure to be taken by residents of the affected areas;
- Type and extent of participation of involved emergency response organizations;

- Identification to communications channels over which further information will be given.

#### 7.0 Protective Action Response Options

Part I, Section III, identifies and discusses the various protective action response options available in the event of a radiological emergency. These response options will either be recommended or directed by the State Health Department as stated in 3.1. These response options are tabulated according to the ingestion pathway and plume exposure actions.

Ingestion pathway EPZ protective action response options include:

- Environmental surveillance
- Milk and dairy products
- Other agricultural products
- Water sources
- Coordination with government agencies outside of New York State

Plume exposure EPZ protective action response options include:

- Initial precautionary operations
- Selective sheltering
- General sheltering
- Selective evacuation
- General evacuation