

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

Docket Nos. 50-445
50-446

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PDR ADCK 05000445
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participated in FEMA's review of the state of emergency preparedness at CPSES.

(Benton) I was formerly responsible for the review and evaluation of off-site REPs for fixed nuclear generating facilities within FEMA's Region VI. During that time, I participated in FEMA's evaluation of the state of emergency preparedness at CPSES.

Q.4 Gentlemen, have you prepared statements of professional qualifications?

A.4 (Lookabaugh and Benton) Yes. Mr. Lookabaugh's statement of professional qualifications was received into evidence at Tr. 5762. Mr. Benton's statement of professional qualifications was received into evidence at Tr. 5761.

Q.5 Are you familiar with the Memorandum from Lee M. Thomas, Associate Director, State and Local Programs and Support, FEMA, to William Dircks, Executive Director for Operations, NRC, entitled, "Interim Findings on Comanche Peak Steam Electric Station Offsite Emergency Preparedness," dated September 29, 1982?

A. (Lookabaugh and Benton) Yes. This one page memorandum is the FEMA Interim Findings for CPSES, which was referred to in our previous written testimony for the September 1982 hearing session (NRC Staff Exhibit 203). A copy of the FEMA Interim Findings for CPSES is attached to our testimony.

Q.6 Gentlemen, was the FEMA Interim Findings released to the public prior to the filing of your prefiled written testimony for the September 1982 hearing session?

A.6 No. The FEMA Interim Findings was released after the filing of our written direct testimony (Staff Exhibit 203) as well as our oral testimony at the September 1982 hearing session (Tr. 5696-5742).

Q.7 Messrs. Lookabaugh and Benton, please identify the attachments to the FEMA Interim Finding.

A.7 The first attachment, "Hood County, Texas, Evaluation of Radiological Emergency Response Plan for Comanche Peak Steam Electric Station," is an evaluation of the Hood County emergency plan which was prepared by Argonne National Laboratories for FEMA. This document is 13 pages in length. The second document, "Somervell County, Texas, Evaluation of Radiological Emergency Response Plan for Comanche Peak Steam Electric Station," which is 14 pages in length, is a similar evaluation prepared by Argonne National Laboratories. Both of these documents were submitted to the FEMA Radiological Assistance Committee (RAC) on July 21, 1982, and were prepared before our prefiled written testimony (Staff Exhibit 203), as well as our oral testimony at the September 1982 hearing session.

The third document, "RAC Review Comments, Texas State Planned Hood and Somervell County Plans," is a cover letter for the RAC Consolidated Comments for the State, and Hood and Somervell County emer-

gency plans. The RAC Consolidated Comments for Hood and Somervell County Plans is a four page attachment to the letter. It is followed by the RAC Consolidated Comments for the Texas State Plan, which is 5 pages in length. The RAC Consolidated comments were prepared in early August, and were prepared before the filing of our written direct testimony (Staff Exhibit 203), as well as our oral testimony at the September hearing session. The RAC Consolidated Comments incorporate the Argonne National Laboratory evaluations referred to above.

The final two documents, "FEMA Review of Texas REP Plans," a 9 page document, and "Hood/Somervell Counties REP Plans, Organization," a 7 page document, are FEMA Region VI's review of the State's and counties' emergency plans. They were prepared in July, 1982, and were FEMA's input to the RAC Consolidated Comments. These documents were prepared prior to the filing of our written direct testimony (Staff Exhibit 203) and our oral testimony at the September 1982 hearing session.

Q.9 Do the FEMA Interim Findings for CPSES (September 29, 1982) change your conclusions regarding the state of emergency preparedness for CPSES, as contained in your written direct testimony (Staff Exhibit 203) or your oral testimony at the September, 1982 hearing session?

A.9 (Lookabaugh and Benton). No. The FEMA Interim Findings confirm, and are consistent with, our previous written and oral testimony.

Q.10 Do the attachments to the FEMA Interim Findings for CPSES change your written direct testimony (Staff Exhibit 203) or your oral testimony at the September 1982 hearing session?

A.10 (Lookabaugh and Benton) No. Since these documents were prepared before our written and oral testimony, our written and oral testimony more accurately reflected the state of emergency preparedness for CPSES at the time of the September 1982 hearing session.

Q.11 Have you received any information since the September 1982 hearing session that would adversely affect your testimony and conclusions regarding the state of emergency preparedness for CPSES?

A.11 (Lookabaugh and Benton) No.

Q.12 Have you received any information since the September 1982 hearing session that would adversely affect the conclusion of the FEMA Interim Finding for CPSES, which states:

Based on this initial review of the relevant State and County Plans there is reasonable assurance at this time that the off-site protection of the public's health and safety is adequate.

A.12 (Lookabaugh and Benton) No. In fact, we have reviewed additional information from the State and the Counties that favorably address many of the previously unresolved objectives and review elements set forth in the RAC Consolidated Comments for CPSES.

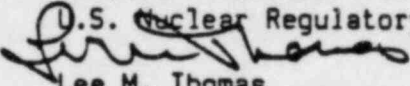


Federal Emergency Management Agency

Washington, D.C. 20472

SEP 29 1982

MEMORANDUM FOR: William Dircks
Executive Director for Operations
U.S. Nuclear Regulatory Commission

FROM: 
Lee M. Thomas
Associate Director
State and Local Programs and Support

SUBJECT: Interim Finding on Comanche Peak Steam Electric Station
Offsite Emergency Preparedness

Attached is a copy of the Federal Emergency Management Agency (FEMA) Region VI Radiological Assistance Committee and FEMA Region VI review of the State of Texas Emergency Management Plan and the Hood and Somervell Counties Emergency Operations Plans. These offsite plans were submitted for the Comanche Peak Steam Electric Station.

The review of the plans was based on Section II (A through P), Planning Standards and Evaluation Criteria, NUREG-0654/FEMA-REP-1, Rev.1.

Based on this initial review of the relevant State and County Plans there is reasonable assurance at this time that the off-site protection of the public's health and safety is adequate. The first joint exercise for the demonstration of off-site preparedness based on these plans is scheduled for early next calendar year.

Attachment
As Stated

82-0070-07

* = Generally Meets Criteria

Hood County, Texas
Evaluation of Radiological Emergency Response Plan
For Comanche Peak Steam Electric Station

A. Assignment of Responsibility (Organizational Control)
Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by state and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

Location/Item

Reference & Comment

A.1.a.	?	Page 22, Sec. VIII and page 43, Sec. III.A and B. are referenced. However, none of those sections identify Federal and private sector response organizations.
A.1.b.	*	Sec. V.A, page 6 and Sec. IV. A and B.
A.1.c.	*	Tab. 1 of Annex F, p. 52; Annex F, p. 31; Annex F, p. 39; Annex B, p. 41
A.1.d.	*	Sec. V.A, p. 6; Sec. 7, A.1, p. 7; Tab. 1, p. 52, Annex F.
A.1.e.	*	Sec. V.B.1, Annex F.
A.2.a.	*	Sec. VI.A and B, pp. 7-20; Sec. V, Annex F, pp. 46-47; Tab. 1, Annex F.
A.2.b.	*	Sec. I, p. 4.
A.3	?	The cross reference N/A indicates that no organizations other than the local governments will have any emergency response role within the Emergency Planning Zones. However, it is conceivable that at least some assistance from state and federal agencies could be needed.
A.4	*	Sec. V.N, Annex F.

C. Emergency Response Support and Resources
Planning Standards

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate state and local staff at the licensee's near site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

<u>Location/Item</u>		<u>Reference & Comment</u>
C.1.a.	N/A	Not a NUREG criteria for local plans.
C.1.b.	N/A	Not a NUREG criteria for local plans.
C.1.c.	?	Sec. IV.D is cited in the cross reference for resources available to support Federal response. However, this section shows only the duties of the response support group and no mention is made of available resources.
C.2.a	N/A	Only the Bureau of Radiation Control will send representatives to the near site EOF. (See Tab. 1, Chap. 1, par. c of Sec. V, appendix 7 to State plan).
C.2.b.	N/A	Licensee responsibility.
C.3	N/A	State plan identifies radiological laboratories.
C.4	*	Sections III.A and III.B, Annex F. identify organizations that can be relied on for emergency assistance; but the nuclear facility should be added.

D. Emergency Classification System
Planning Standard

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and state and local response plans call for reliance on information provided by facility licensees for determination of minimum initial off site response measures.

<u>Location/Item</u>		<u>Reference & Comment</u>
D.1	N/A	Licensee responsibility
D.2	N/A	Licensee responsibility
D.3	*	Documented in Sec. VI, Annex F.
D.4	*	Sections I through VII; attachments A through R, Manual of Emergency Procedures, Annex F. Cross reference D.4 should be corrected to

include Sections I through VII, pages 53-142.

E. Notification Methods and Procedures
Planning Standard

Procedures have been established for notification, by the licensee, of state and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

<u>Location/Item</u>		<u>Reference and Comment</u>
E.1	*	Sections I through VII and Attachments A through C, Manual of Emergency Procedures, Annex F.
E.2	*	Attachment D and Sec. II, Manual of Emergency Procedures, Annex F.
E.3	N/A	Licensee responsibility.
E.4	N/A	Licensee responsibility.
E.5	*	Attachment F. Manual of Emergency Procedures, Annex F.
E.6	*	Attachment F and Section VII, Manual of Emergency Procedures, Annex F.
E.7	*	Provisions are made in Attachment O, Manual of Emergency Procedures for written messages to the public, but samples are not included in Attachment O.

F. Emergency Communications
Planning Standard

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

<u>Location/Item</u>		<u>Reference and Comment</u>
F.1.a.	*	Sec. V.B, Annex F.
F.1.b.	N/A	There are no contiguous state or local governments within the plume exposure pathway Emergency Planning Zone. Communications with organizations outside the plume exposure

		pathway Emergency Planning Zone is a state function and is the responsibility of the District Disaster Headquarters at Waco.
F.1.c.	N/A	Comment for F.1.b applies.
F.1.d.	*	Attachment D, Manual of Emergency Procedures, Annex F.
F.1.e.	*	Attachment E and Sec. II of the Manual of Emergency Procedures, Annex F.
F.1.f.	N/A	Licensee responsibility.
F.2	*	Attachment # and Sec. IV of the Manual of Emergency Procedures, Annex F.
F.3	N/A	Tab. 1, Appendix 7 makes the State Department of Public Safety responsible for testing communications systems.

G. Public Education and Information
Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

<u>Location/Item</u>		<u>Reference and Comment</u>
G.1	*	Attachments F and Sec. VII, Manual of Emergency Procedures, Annex. F.
G.2	?	The cross reference cites Sec. IV.B.3, page 7 of the Hood County Emergency Operations Plan and Sec. IV, A, pages 128 and 129 as providing information for transients. However, the information contained therein is specifically for residents. These sections should also contain detailed information for transients.
G.3.a.	*	Sec. VII.B.3 and B.4, Manual of Emergency Procedures, Annex F.

G.3.b.	N/A	Licensee responsibility
G.4.a.	*	Sec. VII, III.A. and III.B Manual of Emergency Procedures, Annex F.
G.4.b.	?	The cross reference cites Sec. VII, IV.B.3 and IV B.5 for arrangements for exchange of information between spokespersons. However, these references are directed to media briefings.
G.4.c.	*	Sec. VIII, IV.B.7, Manual of Emergency Procedures, Annex F.
G.5	?	The cross reference cites Sec. VII, III.B but no mention is made therein of a coordinated program to be conducted at least annually to acquaint the media with the emergency response plans and information on radiation.

H. Emergency Facilities and Equipment Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided.

<u>Location/Item</u>	<u>Reference/Comment</u>
H.1	N/A
H.2	N/A
H.3	*
	Section V, Part B of the Emergency Operations Plans, Section III, Part 3 of the Hood County Annex F, and Attachment B, Standard operating procedures.
H.4	*
	Section I, Procedures for the Executive Group in combination with Attachment B, Standard Operating Procedure for the EOC.
H.5.a-d	N/A
H.6 a-c	N/A
H.7	?
	Annex F, Section V.M states that the Radiological Defense Officer will provide assistance as requested to the Texas Department of Health if resources are available. This does not address the

requirements of NUREG 0654-H.7 that each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility. Section VII, Part B of the state plan described the assignment of accident assessment responsibilities. The state appears to have adequate equipment and personnel to determine the magnitude of the emergency, and to provide monitoring of the radioactivity. The county should state what equipment, if any, is available to measure whole body gamma exposures and airborne radioiodine concentrations. A plan for transmitting these data, if any, to the EOF should be included.

H.8		N/A
H.9		N/A
H.10	?	See comment for H.7 above.
H.11	?	See comment for H.7 above.
H.12	?	See comment for H.7 above.

I. Accident Assessment Planning Standard

Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

<u>Location/Item</u>	<u>Reference/Comment</u>
I.1	N/A
I.2	N/A
I.3	N/A
I.4	N/A
I.5	N/A
I.6	N/A
I.7	?

Hood County Annex F, Section V.M does not address I.7 which requires that "Each organization shall describe the capability and resources for field monitoring within the

plume exposure EPZ which are intrinsic parts of the concept of operations for the facility." If the county is not depended upon to supply radiological data to the state and to the utility for use in assessing the magnitude of the emergency, the plan should so state.

I.8	?	See comment for I.7
I.9		N/A
I.10		N/A
I.11		N/A

J. Protective Response
Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>Location/Item</u>	<u>Reference/Comment</u>
J.1	N/A
J.2	?
	This is not addressed. The utility is primarily responsible for this but cooperative arrangements for sheltering, decontamination, medical attention, etc. are needed.
J.3	N/A
J.4	N/A
J.5	N/A
J.6	N/A
J.7	N/A
J.8	N/A
J.9	?
	Attachment K to the Hood County plan for Emergency Husbandry Procedures addresses the problem of contamination of human and animal foods in an adequate manner. Gamma ray and radio iodine exposures directly from the

the airborne plume are not adequately addressed. The response indicated in the procedures for the Executive Group is one of ordering evacuation or sheltering when recommended by the state or by the utility. If this is the case the cross-reference for J.9 should include a reference to Section I - The Executive Group Procedures.

J.10.a.	*	Attachment G, Evacuation Procedures
J.10.b.	*	See J.10.a.
J.10.c.	*	Attachment F, Warning.
J.10.d.	*	Attachment G, Evacuation Procedures. Tab. 2 - Section II.C.3.
J.10.e.	*	Annex F, Section V, Paragraph L.3.
J.10.f.	*	See J.10.e.
J.10.g.	*	See J.10.d.
J.10.h.	*	Attachment H - Sheltering.
J.10.i.	*	Attachment G.
J.10.j.	*	This is adequately addressed in the plan. The cross-reference should include a reference to Manual of Emergency Procedures Section II.
J.10.k.	*	Attachment G, Section IV, Tab 2, to Annex F.
J.10.l.	*	Attachment G, Section IV, Tab 2, to Annex F.
J.10.m.		N/A
J.11		N/A
J.12	*	Attachment H - Standard operating procedures for sheltering evacuees.

K. Radiological Exposure Control Planning Standard

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protection Action Guides.

<u>Location/Item</u>	<u>Reference/Comment</u>
K.1	N/A

K.2

N/A

K.3.a. ?

Hood County Annex F Section V M states that exposure control is the function of the Texas Department of Health but that the county RDO will assist as requested if resources are available. Attachment G - Evacuation - Tab. 3 lists the contents of the list for roadblock personnel. Only a TLD is to be furnished. NUREG 0654-K3 requires both self reading (e.g., pocket ion dosimeter) and permanent record dosimeters (e.g., TLD). In addition the self reading devices must have appropriate sensitivities to permit meeting NUREG-0654, K4. Each emergency worker should be provided a sensitive direct reading dosimeter (e.g., 0-200 m Rem) plus a higher range direct reading dosimeter (e.g., 0-20 Rem) plus a permanent record device (e.g., TLD or film badge). Improvements in the plan are needed to insure the availability and proper distributions of appropriate dosimeters. Section VII-B-7 of Appendix 7 to Annex L of the state plan (contamination control) implies that all workers entering a contaminated area will have dosimeters but the number available, the source of supply, etc., is not detailed.

K.3.b. ?

Dose record forms need to be included in the plan and need to be distributed to emergency workers. In addition, requirements need to be developed for frequent reading and timely reporting of doses to the EOCs by the emergency workers.

K.4 ?

The procedure for authorization of emergency workers to incur exposures in excess of PAGs needs to be clearly stated in the county plan. This should clearly name the official who is

able to authorize this action. The procedure should also clearly require that the decision take into account the exposure data from K.3.a. and K.3.b. above.

K.5.a. ?

The Attachment H - Shelter; Monitoring and Precontamination Procedures of the Hood County plan does not specify action levels for decontamination. The Tab 1, Chapter 1, Procedure 5, Part VI does specify action levels for initiating decontamination.

K.5.b. ?

Sections VII.B.8 of Appendix 7 to Annex L of the state plan states that the Bureau of Radiation Protection will advise the local officials in decontamination actions, that are to be conducted in accordance with "NCRP Report No. 65." No procedures for the disposal of wastes was found. No procedures were found in the Hood County plan for waste disposal. NCRP Report No. 65 should be made a part of the plan if it is the appropriate procedure to be followed.

K.6

N/A

K.7

N/A

L. Medical and Public Health Support Planning Standard

Arrangements are made for medical services for contaminated, injured individuals.

Location/Item

Reference/Comment

L.1 ?

Provisions are made in Attachment Q, Manual of Emergency Operations for listing hospitals. However, the list is not developed. When added, this section should list other medical facilities for backup and should state the capabilities for evaluating and treating radiological exposure injuries.

L.2	N/A	Licensee responsibility.
L.3	N/A	Applies to state only.
L.4	*	Sec. VI.B.4 of the County Emergency Operations Plan makes the Hood County Fire Chief and the Fire Chief and Marshalls of the cities responsible for transportation of radiological accident victims.

M. Recovery and Reentry Planning and Post-accident Operations Planning Standard

General plans for recovery and reentry are developed.

<u>Location/Item</u>		<u>Reference/Comments</u>
M.1	?	Section III.R, Manual of Emergency Procedures, Annex 7 states that "details and criteria for recovery and reentry "will be provided by the Texas Department of Health." However, there is no evidence in the plan that general plans and procedures have been developed.
M.2	N/A	Licensee responsibility.
M.3	N/A	State responsibility.
M.4	N/A	State responsibility.

N. Exercises and Drills Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

<u>Location/Item</u>	<u>Reference/Comment</u>
N. ?	The cross reference cites the utility emergency plan, but the state plan makes some of the exercises and drills the responsibility of the utility, the Bureau of Emergency Management, and the Bureau of Radiation Control. There is no evidence in the local plan that local organizations receive training or participate in exercises and drills or that training programs for local emergency response personnel

have been developed. These comments apply to each item in this NUREG-0654 section.

O. Radiological Emergency Response Training
Planning Standard

Radiological emergency response training is provided for those who may be called on to assist in an emergency.

<u>Location/Item</u>		<u>Reference/Comment</u>
N	?	Comment for N, Exercises and Drills, above applies.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans
Planning Standard

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

<u>Location/Item</u>		<u>Reference/Comment</u>
P.1	*	Hood County Emergency Operations Plan Sec. VI.3.e.p.8.
P.2	*	Hood County Emergency Operations Plan Sec. VI.3.b.p.8.
P.3	*	Hood County Emergency Operations Plan Sec. VI, 3, p.8.
P.4	*	Hood County Emergency Operations Plan Sec. XI, p.23.
P.5	?	The cross reference is marked N/A. The state plan, Sections XI.B and XI.D, Annex 7 addresses only state plans and changes. Provisions should be made for forwarding local plans and changes to all responsible emergency response personnel.
P.6	?	Supporting plans and their sources are not listed for the local plans. The cross-reference is marked N/A. The listing of supporting plans found in Tab. 1, Introduction Sections III and IV, Annex 7, state plan pertains only to supporting plans for the state.

P.7	*	Annex A, Sec. VII; Manual of Emergency Procedures, Annex 7.
P.8	*	Table of Contents and Cross References are included.
P.9	N/A	Licensee responsibility.
P.10	?	The cross reference indicates that provisions for updating telephone numbers are in the utility emergency response plan. They should also be included in the local plans.

- : = Deficiency
 * = Generally Meets Criteria

Somervell County, Texas
 Evaluation of Radiological Emergency Response Plan
 For Comanche Peak Steam Electric Station

A. Assignment of Responsibility (Organizational Control)
 Planning Standard

Primary responsibilities for emergency response by the nuclear facility licensee, and by state and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.

<u>Location/Item</u>		<u>Reference/Comments</u>
A.1.a.	?	Page 20, Sec. VIII and page 43, Sec. III.A and B. are referenced. However, none of those sections identify Federal and private sector response organizations.
A.1.b.	*	Sec. V.A, page 6 and Sec. IV.A and B, page 44.
A.1.c.	*	Tab. 1 of Annex F, p. 51; Annex F, p. 31; Annex F, p. 39; Annex B, p. 41.
A.1.d.	*	Sec. V.A, p. 6; Sec. 7, A.1, p.7; Tab. 1, p. 51.
A.1.e.	*	Sec. V.B.1, Annex 7.
A.2.a.	*	Sec. VI.A and B, pp. 7 - 17; Sec. V, Annex F, pp. 45-48; Tab. 1, Annex F.
A.2.b.	*	Sec. I, p. 4; Attachment 2/1, p. 23.
A.3	?	The cross reference N/A indicates that no organizations other than the local governments will have any emergency response role within the Emergency Planning Zones. However, it is conceivable that at least some assistance from state and federal agencies could be needed.
A. 4	*	Sec. V.N, Annex F.

C. Emergency Response Support and Resources Planning Standard

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate state and local staff at the licensee's near site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

<u>Location/Item</u>		<u>Reference/Comments</u>
C.1.a.	N/A	Not a NUREG criteria for local plans.
C.1.b.	N/A	Not a NUREG criteria for local plans.
C.1.c.	?	Page 138, Sec. IV.D, Attachment B, Manual of Emergency Procedures, Annex F, is cited in the cross reference for resources available to support Federal response. However, this section shows only the duties of the response support group and no mention is made of available resources.
C.2.a.	N/A	Only the Bureau of Radiation Control will send representatives to the near site EOF. (See Tab. 1, Chap. 1, par. C of Sec. V, Appendix 7 to State plan).
C.2.b.	N/A	Licensee responsibility.
C.3	N/A	State plan identifies radiological laboratories.
C.4	*	Sections III.A and III.B, Annex F, identify organizations that can be relied on for emergency assistance; but the nuclear facility is not included.

D. Emergency Classification System Planning Standard

A standard emergency classification and action level scheme, the basis of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and state and local response plans call for reliance on information provided by facility licensees for determination of minimum initial off site response measures.

<u>Location/Item</u>		<u>Reference/Comments</u>
D.1	N/A	Licensee responsibility

D.2	N/A	Licensee responsibility
D.3	*	Documented in Sec. VI, Annex F.
D.4	*	Sections I through VII; Attachments A through R, Manual of Emergency Procedures, Annex F. Cross reference D.4 should be corrected to include Sections I through VII, pages 55 - 130.

E. Notification Methods and Procedures
Planning Standard

Procedures have been established for notification, by the licensee, of state and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

<u>Location/Item</u>		<u>Reference/Comments</u>
E.1	*	Sections I through VI and Attachment A through D, Manual of Emergency Procedures, Annex F.
E.2	*	Attachment D, and Sec. II, Manual of Emergency Procedures, Annex F.
E.3	N/A	Licensee responsibility.
E.4	N/A	Licensee responsibility.
E.5	*	Attachment F. Manual of Emergency Procedures, Annex F.
E.6	*	Attachment F, and Sec. VI, Manual of Emergency Procedures.
E.7	*	Provisions are made in Attachment O, Manual of Emergency Procedures for written messages to the public, but samples are not included in Attachment O.

F. Emergency Communications
Planning Standard

Provisions exist for prompt communications among principal response

organizations to emergency personnel and to the public.

<u>Location/Item</u>		<u>Reference/Comment</u>
F.1.a.	*	Sec. V.B, Annex F.
F.1.b.	N/A	There are no contiguous state or local governments within the plume exposure pathway Emergency Planning Zone. Communications with organizations outside the plume exposure pathway Emergency Planning Zone is a state function and is the responsibility of the District Disaster Headquarters at Waco.
F.1.c.	N/A	Comment for F.1.b. applies.
F.1.d.	*	Attachment D, Manual of Emergency Procedures, Annex F.
F.1.e.	*	Attachment D and Sec. II of the Manual of Emergency Procedures, Annex F.
F.1.f.	N/A	Licensee responsibility.
F.2	*	Attachment E and Sec. IV of the Manual of Emergency Procedures, Annex F.
F.3	N/A	Tab. 1, Appendix 7 makes the State Department of Public Safety responsible for testing communications systems.

G. Public Education and Information Planning Standard

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

<u>Location/Item</u>		<u>Reference/Comments</u>
G.1	*	Attachments F and Sec. VII, Manual of Emergency Procedures, Annex. F.

G.2	?	The cross reference cites the Manual of Emergency Procedures, Sec. IV, Part IV, A, pages 118 and 119 as providing information for transients. However, the information contained therein is specifically for residents. These sections should also contain detailed information for transients.
G.3.a.	*	Sec. VI.B.3 and B.4, Manual of Emergency Procedures, Annex F, page 119.
G.3.b.	N/A	Licensee responsibility.
G.4.a.	*	Sec. VI, III.A. and III.B. Manual of Emergency Procedures, Annex F.
G.4.b.	?	Sec. VI, IV.B.3 and IV.B.5, p. 119.
G.4.c.	*	Sec. VI, IV.B.7, Manual of Emergency Procedures, Annex F.
G.5	?	The cross reference cites Sec. VI, III.B. but no mention is made therein of a coordinated program to be conducted at least annually to acquaint the media with the emergency response plans and information on radiation.

H. Emergency Facilities and Equipment Planning Standard

Adequate emergency facilities and equipment to support the emergency response are provided:

<u>Location/Item</u>	<u>Reference/Comments</u>
H.1 .	N/A
H.2	N/A
H.3	* Section V Part B of the Emergency Operating Plan; Section IV Part B of Sommervell County, Annex F; and Attachment B, Standard Operating Procedures for the EOC.
H.5 a-d	N/A
H.6 a-c	N/A
H.7	? Sommervell County Annex F Section V M states that the Radiological Defense Officer will

provide assistance as requested to the Texas Department of Health if resources are available. This does not address the requirements of NUREG-0654-H.7 that "Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility." Section VII Part B of the State Plan describes the assignment of accident assessment responsibilities. The state appears to have adequate equipment and personnel to determine the magnitude of the emergency and to provide monitoring of the radioactivity. The county should state what instruments if any are available to measure whole body gamma exposures and airborne radio iodine concentrations. A plan for transmitting these data, if any, to the EOF should be included.

H.8		N/A
H.9		N/A
H.10	?	See H.7 above.
H.11	?	See H.7 above.
H.12	?	See H.7 above.

I. Accident Assessment Planning Standard

Adequate methods, systems and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

<u>Location/Item</u>	<u>Reference/Comments</u>
I.1	N/A
I.2	N/A
I.3	N/A
I.4	N/A
I.5	N/A

I.6		N/A
I.7	?	Sommervell County Annex F, Section V.M does not address I.7 which requires that "Each, organization shall describe the capability and resources for field monitoring within the plume exposure EPZ which are an intrinsic part of the concept of operations for the facility." If the county is not depended upon to supply radiological data to the state and to the utility for use in assessing the magnitude of the emergency, the plan should so state.
I.8	?	See comment for I.7.
I.9		N/A
I.10		N/A
I.11		N/A

J. Protective Response
Planning Standard

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

<u>Location/Item</u>	<u>Reference/Comments</u>
J.1	N/A
J.2	?
	This is not addressed. The utility is primarily responsible for this requirement but cooperative arrangements for sheltering, decontamination, medical treatment, etc. are needed.
J.3	N/A
J.4	N/A
J.5	N/A
J.6	N/A

J.7		N/A
J.8		N/A
J.9	?	Attachment K to the Sommervell County plan is cited in the cross reference. This attachment addresses Emergency Husbandry Procedures in an adequate manner, but Gamma ray exposure and radioiodine exposures directly from the airborne plume are not adequately addressed. The response indicated in the procedures for the Executive Group is one of ordering evacuation or sheltering when recommended by the State or by the Utility. If this is the case, the cross reference should include a reference to Section I - The Executive Group Procedures.
J.10.a.	*	Attachment G, Evaluation Procedures.
J.10.b.	*	See J.10.a.
J.10.c.	*	Attachment F, warning.
J.10.d.	*	Attachment G, Evacuation Procedures Tab. 2, Section II C 3.
J.10.e.	*	Sommervell County Annex F, Section V 4 state that the RDO will assist the State Department of Health in administering radioprotective drugs if requested.
J.10.f.	*	See comment for J.10.e.
J.10.g.	*	See comment for J.10.d.
J.10.h.	*	Attachment H - Shelter - Describes location and procedures.
J.10.i.	*	Attachment G - Evacuation Procedures.
J.10.j.	*	This is adequately addressed in the plan. The cross reference should include a reference

		to the Manual of Emergency Procedures - Section II.
J.10.k.	*	Possible impediments to evacuation (e.g. ice on roads) is addressed in the evacuation plan, Attachment G.
J.10.l.	*	The evacuation plan, Attachment G, includes analyses of times required for evacuating each sector under each of several weather conditions.
J.10.m.	*	N/A
J.11		N/A
J.12	*	Attachment H - Standard Operating Procedures for Sheltering Evacuees.

K. Radiological Exposure Control Planning Standard

Means for controlling radiological exposure, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

<u>Location/Item</u>	<u>Reference/Comments</u>
K.1	N/A
K.2	N/A
K.3	?
	Sommervell County Annex F Section V M states that exposure control is the function of the Texas Department of Health but that the county RDO will assist as requested if resources are available. Attachment G Evacuation - Tab. 3 lists the contents of the kit for roadblock personnel. Only a TLD is to be furnished. NUREG-0654-K3 requires both self reading (e.g. pocket ion chamber) and a permanent record dosimeter (e.g. TLD). In addition, the self

reading devices must have appropriate sensitivities to permit meeting NUREG 0654-K4. Each emergency worker should be provided a sensitive direct reading dosimeter (e.g. 0 - 20 m Rem) plus a higher range direct reading dosimeter (e.g. 0 - 20 Rem) plus a permanent record device (e.g. TLD or film badge). Improvements in the plan are needed to insure the availability and proper distribution of appropriate dosimeters. Section VII-B-7 of Appendix 7 to Annex L of the State Plan (Contamination Control) implies that all workers entering a contaminated area will have dosimeters but the number available, the source of supply, etc., is not detailed.

K.3.b. ?

Dose record forms need to be included in the plan and need to be distributed to emergency workers. In addition, requirements need to be developed to insure timely readings and timely reporting of doses to the EOCs by the emergency workers.

K.4 ?

The procedure for authorizing emergency workers to incur exposures in excess of PAGs needs to be clearly stated in the county plan. This should clearly name the official who is able to authorize this action. The procedure should also clearly require that the decision take into account the exposure data from K.3.a and K.3.b above.

K.5.a. ?

The Attachment H - Shelter - Monitoring and Decontamination Procedures for the Sommervell county plan does not specify action levels for decontamination. Section VII B-7 of the State Plan - Contamination

Control - does not specify action levels for decontamination.

K.5.b. ?

Section VII B 8 of Appendix 7 to Annex L of the State Plan specifies that the Bureau of Radiation Protection will advise the local officials in decontamination actions that are to be conducted in accordance with "NCRP report No. 65." No procedure for the disposal of contaminated wastes was found. No procedure was found in the Sommervell county plan for waste disposal. "NCRP Report No. 65" should be made a part of the plan if it is the appropriate procedure to be followed.

L. Medical and Public Health Support
Planning Standard

Arrangements are made for medical services for contaminated injured individuals.

Location/Item

Reference/Comments

L.1 ?

Provisions are made in Attachment Q, Manual of Emergency Operations for listing hospitals. However, the list is not developed. When added, this section should list other medical facilities for back up and should state the capabilities for evaluating and treating radiological exposure injuries.

L.2 N/A

Licensee responsibility.

L.3 N/A

Applies to state only.

L.4 *

Sec. VI.B.4 of the State Emergency Operations Plan.

M. Recovery and Reentry Planning and Post-accident Operations
Planning Standard

General plans for recovery and reentry are developed.

Location/Item

Reference/Comments

M.1 ?

Section I, Par III S, page 69, Manual of

Emergency Procedures, Annex F, states that details and criteria for recovery and reentry "will be provided by the Texas Department of Health." However, there is no evidence in the plan that general plans and procedures have been developed.

M.2 N/A

Licensee responsibility.

M.3 *

Sec. 3, Par. III L, p. 94. This should be added to the cross reference.

M.4 N/A

State responsibility only. Reference to appropriate section of state plan.

N. Exercises and Drills Planning Standard

Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.

Location/Item

Reference/Comments

N. ?

The cross reference cites the utility emergency plan, but the state plan makes some of the exercises and drills the responsibility of the utility, the Bureau of Emergency Management and the Bureau of Radiation Control. There is no evidence in the local plan that local organizations receive training or participate in exercises and drills or that training programs for local emergency response personnel have been developed. These comments apply to each item in this NUREG-0654 section.

O. Radiological Emergency Response Training Planning Standard

Radiological emergency response training is provided for those who may be called on to assist in an emergency.

<u>Location/Item</u>	<u>Reference/Comments</u>
0 ?	Comment for N, Exercises and Drills, above applies.

P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans
Planning Standard

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

<u>Location/Item</u>	<u>Reference/Comments</u>
P.1 *	Sommervell County Emergency Operations Plan Sec. VI.2.g, p. 8. .
P.2 *	Sommervell County Emergency Operations Plan Sec. VI.2.d, p. 8.
P.3 *	Sommervell County Emergency Operations Plan Sec. VI, 2, p. 8.
P.4 *	Sommervell County Emergency Operations Plan Sec. XI. p. 23.
P.5 ?	The cross reference is marked N/A. The state plan, Sections XI.B and XI.D, Annex 7 addresses only state plans and changes. Provisions should be made for forwarding local plans and changes to all responsible emergency response personnel.
P.6 ?	Supporting plans and their sources are not listed for the local plans. The cross reference is marked N/A. The listing of supporting plans found in Tab. 1, Introduction Sections III and IV, Annex 7, state plan pertains only to supporting plans for the state.
P.7 *	Annex A, Sec. VI, Manual of Emergency Procedures, Annex 7, p. 132.
P.8 *	
P.9 N/A	Licensee responsibility.

P.10

?

The cross reference indicates that provisions for updating telephone numbers are in the utility emergency response plan. They should also be included in the local plans.

RAC REVIEW COMMENTS

Texas State Plan and Hood and Somervell County Plans

REFERENCES: State of Texas Emergency Management Plan
Texas Department of Health, Annex L
Bureau of Radiation Control, Appendix 7
Fixed Nuclear Facilities Accidents, Tab 1
Comanche Peak Steam Electric Station, Chapter 1

Hood and Somervell County Emergency Operations Plan
Attachments 1 and 2
Annexes A-F
Manual of Emergency Procedures
Sections I-VII
Attachments A-R (Save I)
Tabs

CRITERIA: NUREG-0654, FEMA REP 1, Rev. 1

The RAC and their letter designation for the consolidated comments are as follows:

F-FEMA	- Federal Emergency Management Agency
N-NRC	- Nuclear Regulatory Commission
E-DOE	- Department of Energy
P-EPA	- Environmental Protection Agency
R-FDA	- Food and Drug Administration
H-HSA	- (HHS) Health Services Administration
T-DOT	- Department of Transportation
A-USDA	- U. S. Department of Agriculture
L	- Argonne National Laboratories (FEMA contract)
C-DOC	- Department of Commerce (no review requested)

HOOD AND SOMERVELL COUNTY PLANS

RAC CONSOLIDATED COMMENTS

<u>Element</u>	<u>Agency</u>	<u>COMMENTS</u>
A.1.a.	L	The plan does not identify the Federal organizations that should be part of the overall response organization.
A.3.	L	There is no concise definition as to the need or lack of need for assistance from Federal and state agencies regarding emergency response roles.
	F	Consider letters of agreement with any other than governmental organizations who may respond.
C.1.a.	F	Can local government request Federal/military assistance directly?
C.1.c.	L	The section shows only duties of the response support group and no mention is made of available resources.
C.2.a.	F	Plan does not designate local official to serve as representative at EOF.
C.4.	F	Letters of agreement may be appropriate.
E.3.	F	Indicate not designated state/local planning responsibility. However, feel this element should be addressed by state and local. (See page 156, warning message "Similar to")
E.6.	T	Time required for notifying and informing public of accident/incident not noted.
F.1.b.	F	No provisions for communications with contiguous local governments (eg. through DPS District Office, Waco).
F.2.	F	Plans indicate N/A as does state plan. Local plans should address this element (capability to communicate between ambulance/hospital.
G.2.	F,L	Lack of provision for information to transient population.
G.4.b.	L	Section VII, IV, B.3. and 5. regarding arrangements for exchange of information between spokespersons is directed mainly at media briefings.
G.4.c.	F	Suggest telephone number or central location for factual information and disspeiling rumors.
G.5.	F,L	No provisions or programs to acquaint media with plans, radiation and points of contact on annual basis.

<u>Element</u>	<u>Agency</u>	<u>Comments</u>
H.7.	L	Does not address NUREG-0654 regarding off-site radiological monitoring equipment requirements.
H.10.	L	Same as H.7.
H.11.	L	Same as H.7.
H.12.	L	Same as H.7.
I.7	L	Plans should state that the county does not need to be depended upon to supply radiological data to the state and utility.
I.8.	L	Same as I.7.
J.2.	L	Not addressed. Need cooperative agreements for sheltering, decontamination, medical treatment, etc. of on-site personnel.
J.9.	L	Gama and radio-iodine exposure in the ingestion pathway not adequately addressed.
J.10.a.	F T	No maps of evacuation areas. Lack of precise evacuation procedures (assume these will be included in public information package).
J.10.c.	F	Outdoor warning devices to cover entire 10-mile EPZ - how notify hard of hearing?
J.10.d.	F	No provisions for hard of hearing or handicapped persons not institutionalized.
J.10.g.	F T	Plan should identify residents not having access to transportation and assure capability for evacuation. Transportation resources not listed.
J.10.h.	F T	Shelter facilities should be outside 10-mile EPZ. Glenrose High School listed as shelter facility and is within 10-mile EPZ. Shelter facilities not located.
J.10.i.	F	Tab 2 - misspelled word. "Area" section is upside down.
K.3.b.	L	Procedures for reporting dose readings by emergency workers should include more frequent readings and excessive exposure procedures should be addressed. Instructions for public who might move into exclusion areas should be provided.

<u>Element</u>	<u>Agency</u>	<u>Comments</u>
K.4.	L	Who authorizes emergency workers to exceed PAGs?
K.5.a.	L	Monitoring and decontamination procedures do not specify levels for decontamination.
K.5.b.	L	No procedures for disposal of contaminated waste.
L.1.	H,L,N	No hospital listing, no backup medical facilities, no listed capabilities for receiving, evaluating, and treating radiologically exposed individuals.
L.2.	H	No mention of transporting victims.
L.3.	F	Need letters of agreements from hospitals, need capability of hospitals to accept or treat patients.
	N	See L.1.
	L	Need citations from appropriate appendices of hospital plans relative to handling contaminated/injured personnel.
L.4.	L	No capability for handling radioactively contaminated patients by ambulance services noted. Number of ambulances available not noted.
	N	
M.1.	F	State plan does not address details of recovery and reentry such as time-phased movement, etc. If this is local plan responsibility, should be addressed.
	L	No criteria for recovery and reentry (state plan does not cover for local).
	R	Plans lack procedures for reentry.
N.2.c.	N	No provisions for emergency medical drills.
N.all	F	Scenario development primarily responsibility of state. However, local plans should indicate willingness of local governments to participate in exercises and drills.
	L	No evidence that local organizations will participate in exercises and drills or training programs.
O.1.a.	R	No plans for training of local personnel.
O.1.b.	F	Local plans should indicate that local organizations participate in appropriate training and if mutual aid pacts exist, all training for those entities will also be made available.
O.4.a.	F	Same as O.1.b.

<u>Element</u>	<u>Agency</u>	<u>Comments</u>
O(General)	L	Lack of provisions for training of local response groups.
O.5.	F	Same as O.1.b.
P.1	F	Plan does not state qualifications or training for Emergency Management Director/Coordinator.
P.4.	F	Plans should indicate updates will occur as a result of plan review.
P.5.	F	Local plan should contain distribution lists of plan and indicate changes to plan will be dated and marked.
	L	There should be provisions for forwarding plans and changes thereto to all emergency response personnel.
P.6.	F	Supporting plans and authority, while cross reference indicates N/A, are found on Page 2 as II and I respectively.
	L	Supporting plans and sources not listed for local plans. Listing of supporting plans found in Tab 1 and other parts of plan.
P.8.	F	Suggest that plan organization and addendum be better defined and tabbed for easy reference.
P.10.	F	Plan should contain revisions for updating telephone numbers on a quarterly basis.

TEXAS STATE PLAN

RAC CONSOLIDATED COMMENTS

<u>Element</u>	<u>Agency</u>	<u>Comments</u>
A.1.a.	L	The plan does not identify the Federal organizations that should be part of the overall response organizations.
A.1.e.	L	Plan does not specifically state that each response organization can provide 24-hour per day response in manning communication links.
A.2.a.	R	Due to lack of capabilities in fire protection at local level, state should consider augmenting fire protection.
A.3.	A E	Needs to review Annex C. Planning for Federal response should be included even though there is no intent to use Federal resources. The plan at a minimum should recognize the need for Federal assistance is at least possible and assign responsibilities and authorities to appropriate staff and establish procedures for requesting Federal assistance.
A.4.	F	Correction to cross reference of Appendix 7.
B.2.	F	Generally not considered state/local planning responsibility. However may wish to note utility spokesperson responsible for initial notification.
C.1.b.	L	Although requests for Federal operational assistance is not anticipated, according to Appendix 7 this does not preclude a possible need. (See A.3.)
C.3.	R N	University of Texas backup and Texas A&M backup capabilities not stated. Availability of radiological laboratories not noted.
C.4.	L	Federal organizations which can be relied on for assistance should be named and letters of agreement included.
E.1.	R,P	Verification in accordance with state SOP; SOPs not available for review.
E.2.	N	Procedures for mobilizing emergency response personnel lacking.

Texas State Plan

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<u>Element</u>	<u>Agency</u>	<u>Comments</u>
E.3.	F	Indicate not designated state/local planning responsibility. However, feel this element should be addressed by state and local.
E.5.	L	Local government and DPS plans (Annex R, Appendix 2) should also be in the state plan.
E.6.	T	Time required for notifying and informing public of accident/incident not noted.
	L	Same E.5. comments apply.
F.1.a.	L	Appropriate sections of Annex R and Annex AA should be included in the state radiological emergency response plan, Appendix 7, to make the plan more convenient for emergency response personnel.
F.1.b.	L	Same comment as F.1.a. applies.
F.1.d.	N	Description of communication systems need enhancing.
G.4.a.	N	Who are state spokespersons, by title, who coordinate news media?
G.5.	L	References in local plans make no mention of coordinated program for the media.
H.4.	L	EOC activation procedures should be made part of the plan.
H.7.	N	No listing of specific monitoring equipment.
H.10	N	Monitoring capability questioned without list of instruments.
H.11.	P	Monitoring kits do not include equipment operating manuals, site maps, and check sources.
	L	Question capability of Ludlum 14c for measuring high-range gama radiation.
I.7.	L	Field monitoring teams lack high-range non-validating survey meters (see comments for item H.11.)
I.8.	N	Need BRC activation procedures. Need monitoring team communications capability and deployment times.
I.9.	N	Radioiodine monitoring not found.

Texas State Plan

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<u>Element</u>	<u>Agency</u>	<u>Comments</u>
I.10	P	Suggest plan for PAGs include nomograms.
J.9.	H	Appendices 2 and 9 and Annex L not available for review.
J.10.b.	L	Necessary maps should be available in state EOC, district EOC, and state plan.
J.10.e.	H	KI quantity and distribution not provided for in the plans.
J.10.m.	H	No reference to shelter protection for direct and inhalation exposures or evacuation time estimates listed in the plan.
J.11.	H	Did not observe any land use maps, detailed crop information maps or food processing facilities maps in the plan.
	A	Did not receive Annex C (assigned to Texas Department of Agriculture).
J.12.	P	Did not find monitoring procedures indexed anywhere in attachment H of the CPSES. Monitoring equipment should be specified.
K.3.b.	L	Procedures for reporting dose readings by emergency workers should include more frequent readings and excessive exposure procedures should be addressed. Instructions for public who might move into exclusion areas should be provided.
K.4.	P	No specific reference to responsible authority dealing with exposure of emergency workers to doses in excess of the PAGs.
	L	Who authorizes emergency workers to exceed PAGs?
K.5.a.	L	Monitoring and decontamination procedures do not specify levels for decontamination.
K.5.b.	L	No procedures for disposal of contaminated waste.
L.3.	F	Need letters of agreement from hospitals, need capability of hospitals to accept or treat patients.
	L	Need citations from appropriate appendices of hospital plans relative to handling contaminated/injured personnel.

Texas State Plan

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<u>Element</u>	<u>Agency</u>	<u>Comments</u>
L.4.	F	Functional statement insufficient to determine capability for transporting RC patients to medical facilities.
	L	See L.3. comments.
M.1.	H	Need for general plans to include exposure levels which would be acceptable from ingestion or inhalation pathways. Plan should also include potential buildup conditions of contamination in food pathways or transfer of contamination (i.e. drainage from land, not potable water supplies)
N.1.a.	N	NRC rules not referenced.
N.2.d.	N	Radiological monitoring drills not addressed.
N.all	R,P	Plans lack procedures for reentry. Plan should indicate additional drills/exercises if critiques so indicate or as staff changes occur or new equipment is acquired.
	A	Suggest USDA be involved in drills and exercises.
	L	No provisions for exercises between 6 p.m. and 6 a.m. No dates, times, places noted for exercises or drills. No time schedule of events. No exercises or drills for such things as simulated casualties, off-site fire assistance, rescuing, etc. No provisions for advanced materials for off-site observers.
O.1.a.	F	Reference should be made to Tab 1, Attachment 4, which further addresses training.
O.4.d.	L	Information from annexes R, AA, and FF relative to training should be made available for review and included in the plan.
O.4.f.	L	Same as above.
O.4.g.	L	Cross reference indicates training for locals; however, not found in local plans.
O.4.h.	L	Training for medical personnel not responsive. Same comments as found in O.4.d. applies.
O.4.j.	L	Same comments as O.4.d.
O.5.	L	Cross reference refers to documents not available for review (same comment as O.4.d. applies).
P.1.	L	Incorrect cross reference.

Texas State Plan

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<u>Element</u>	<u>Agency</u>	<u>Comments</u>
P.7.	L	No listing by title of detailed implementing procedures.
P.10.	F	Telephone numbers should be updated quarterly rather than annually.

FEMA review of Texas REP Plans

STATE OF TEXAS EMERGENCY MANAGEMENT PLAN
TEXAS DEPARTMENT OF HEALTH, ANNEX L
BUREAU OF RADIATION CONTROL, APPENDIX 7 (RADIOLOGICAL EMERGENCY RESPONSE
TAB 1: FIXED NUCLEAR FACILITY ACCIDENTS
CHAPTER 1: COMANCHE PEAK STEAM ELECTRIC STATION
PROCEDURES (IMPLEMENTING OR STANDARD OPERATING)

GENERAL:

Plan is well organized with an excellent cross-reference to NUREG-0654. Both the planning and operating concept for the state of Texas are easily identified and portrayed as one in which Radiological Emergency Preparedness is treated as another potential emergency situation with assigned responsibilities being accomplished in the same manner as they would for any other emergency.

SPECIFIC: (NUREG-0654 criteria)

A. ASSIGNMENT OF RESPONSIBILITY

- 1.a. The State of Texas Emergency Management plans adequately identify State, Local Federal and Utility response organizations. (State Plan p.5 and pp. 1-2-3 of tab 1 to appendix 7)
O.K.
- b. At the State level the Bureau of Radiation Control is organized into 3 operational divisions on a day-to-day basis and into 3 elements for emergencies. (p. 4, appendix 7)
O.K.
- c. State Department assignment of responsibilities for radiological emergency response illustrated in block diagram. (p.25 attachment 2 to appendix 7)
O.K.
- d. The Director of the Division of Emergency Management as Chairman of the Emergency Management Council has overall control. He is advised appropriately by other state agencies. For radiological emergencies in descending order he would be advised by the Commissioner of Health, the Chief of the Bureau of Radiation Control and the Chief of Field Operations.
O.K.
- e. Receipt of warning of or actual emergency conditions exists on a 24 hour basis both at the district and state level of the Disaster Emergency Management offices. Response would be initiated at the Public Health Region or State level of response, determined by the Director, Division of Compliance and Inspection.
O.K.
- 2.a. Within the state plan, primary and support responsibilities for major elements are shown by table. (Annex L) Functions and responsibilities defined. (Appendix 7 lists functions and title of responsible individual for each function.)
O.K.

Assignment of responsibility cont'd

- b. State Emergency Management Plan, Annex L, Appendix 7 all list legal basis for authorities.
O.K.
- 3. State plan has signature page for state agencies. American Red Cross functional statement included. (Annex L) Tab 1 to Appendix 7 has responsibilities of other state departments and utility listed. Written agreements with U.T. Austin and Texas A&M.
O.K.
- 4. State plan. Capability of Health Department contained in annex L. State EOC (DPS/DEM) capability for 24 hour per day operations noted. Appendix 7 under Logistics Support, Emergency Recall Procedures and Supervisory responsibility assignments by individual
O.K. (NOTE CORRECTION TO CROSS-REFERENCE OF APPENDIX 7)

B. ONSITE EMERGENCY ORGANIZATION

- 2. While 0654 does not indicate nor require that this element should be addressed by State/Local governments you may wish to consider noting the individual (by title) at the licensee's facility who is responsible for initiating emergency actions, including recommendations regarding protective actions to offsite authorities.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

- 2.a. State response team will consist of a utility liaison team (three, 1-man shifts) which will be deployed to the near-site EOF.
O.K.
- 4. SMARAP listed as first option for outside assistance. Note also that laboratory facilities at U.T. Austin add TEXAS A&M have agreed to provide assistance. Letters of agreement and capabilities included.
O.K.

D. EMERGENCY CLASSIFICATION SYSTEM

- 3. State classification scheme is consistent with Federal Guidance and that of the utility.
O.K.
- 4. State response levels are appropriate and consistent with the utility's and 0654 warning classification.
O.K.

E. NOTIFICATION METHODS AND PROCEDURES

- 1. Bases for notification consistent with 0654, appendix 1. Verification Procedures will be employed.
O.K.

NOTIFICATION METHODS AND PROCEDURES cont'd

- 2 State Plan. Each state department designates three individuals to be contacted in time of emergency. Within DCH, the Director of Disaster Response has Regional and Bureau Chiefs telephone numbers who in turn have designated 3 - 5 individuals for contact. Appendix 7 indicates once the Bureau of Radiation C Control receives notification it is passed to the Director, Division of C & I descending to 3 branch administrators. Attachment 5 indicates recall procedures by name and telephone number. (See also appendix 7, VI B, "Organization for Emergencies" for mobilization of emergency response personnel.
O.K.
3. Appendix 7 only. Referenced part of plan is a sample message for which includes those objectives addressed in the 0654 element.
O.K.
5. This item to be addressed by local plans and normal DPS procedures (Annex R) to be followed.
O.K.
6. Responsibility assumed by local government and DPS.
(Annex R)
OK.
7. Local government responsibility. Bureau of Radiation Control will advise local government re: protective measures.
O.K.

F. EMERGENCY COMMUNICATIONS

- 1.a. State plan directs agency heads to develop appropriate notification procedures. Reference DPS (Annex R) and DEM (Annex AA) as primary responsible agencies for 24 hour per day communications links. Also references local plans.
O.K.
- b. Annex R (DPS), local plans. Contiguous states not applicable to this site.
O.K.
- c. DPS/DEM (Annex R and AA respectively) Tab 1 indicates proper channels are DEM/FEMA Region VI via telephone, NAWAS and NACOM.
O.K.
- d. Annex R. Local plans for communications. Radiation Monitor team members will have radio contact with team leaders.
O.K.

EMERGENCY COMMUNICATIONS cont'd

- e. State plan assigns responsibility to agency heads. Indicates priority of order call to be established within council agencies. Health Department responsibility for alert and activation of emergency personnel is responsibility of the Director of Disaster Response Program. (Warning and emergency communications is responsibility of DPS. Agency notification is responsibility of DEM) O.K.

- 2. Local plan/responsibility only.

G. PUBLIC EDUCATION AND INFORMATION

- 1. Annex AA and local plan O.K.
- 2. Local Plan O.K.
- 3.a. Responsibility of State Emergency Public Information Officer; Bureau of Radiation Control will have spokesperson who will coordinate with licensee and local government counterparts. DPS coordinates all public information. DEM coordinates public information from State EOC. O.K.
- 4.a. DEM has primary responsibility for dissemination of emergency public information. Single point of contact for EPI release and for persons seeking information is DEM. Bureau of Radiation Control will have public information coordinator. O.K.
- b. Bureau of Radiation Control Public Information coordinator will arrange for timely exchange of information with appropriate licensee and local government public information personnel. O.K.
- c/ Same individuals as above will coordinate information releases to correct or forestall rumors. O.K.
- 5. Local government responsibility. Bureau of Radiation Control will assist in development of Public Information materials to be released for annual exercise of plan.

H. EMERGENCY FACILITIES AND EQUIPMENT

- 3. State EOC, DPS Austin and State District EOC (Waco) (See local plans) O.K.

EMERGENCY FACILITIES AND EQUIPMENT Cont'd

4. State agency personnel who have operational responsibility will staff State and District EOC's
O.K.
11. Applicable emergency supplies and protective equipment listed in procedures. Communications equipment DPS responsibility. Radiation monitoring team equipment and supplies listed in attachment 6 of Chapter 1 of tab 1 to appendix 7 annex L. Other emergency supplies listed as procedures 2 - 6.
O.K.

I. ACCIDENT ASSESSMENT

No FEMA assigned review elements

J. PROTECTIVE RESPONSE

- 10.a. Map depicting monitoring points located in Chapter 1 of tab 1. Other maps local government responsibility.
O.K.
- b. Local government responsibility
- c. Local Government responsibility
- d. Consideration made for mobility impaired through sheltering, respiratory protection (filtering air, limiting outside air intake etc.) evacuation or use of KI.
O.K.
- f. No KI to be used for general populace. KI will be administered to emergency workers in accordance with Protective Action Guides.
O.K.
- g. Local government responsibility
- h. " " "
- i. " " "
- j. "Contamination Control" addresses control of access to exclusion area and responsibilities for control.
O.K.
- k. No significant impediments noted
- l. Local government responsibility
11. Annex C and appendix 2 and 9 of Annex L not available for review, however, tab 1 appears to sufficiently address this element. Department of Agriculture responsible for land-use maps. Monitoring points map noted.
O.K.

PROTECTIVE RESPONSE Cont'd

12. State plan indicates evacuees are responsibility of hosting government. Local plan responsibility.
O.K.

K. RADIOLOGICAL EXPOSURE CONTROL

- 3.a. Bureau of Radiation Health Contamination Control team will provide dosimetry. Emergency worker dose record noted.
O.K.

L. Medical and Public Health Support

3. (Appendix 3, 11 and 12 to annex L. Appendix 3 contains functional statement for Bureau of Emergency Management. Appendix 11, Public Health Regions functional statement "to be developed". Appendix 12. Functional statement for licensing and certification.)

Tab. 1, Chapter 1 Page 10, item 9 lists 3 hospitals capable of handling radioactively contaminated individuals. Hospitals have agreed to accept these individuals. Hospitals do not have letters of agreement (Local plans?)
How many radioactively contaminated individuals can the hospitals handle at one time?

4. Reference is made to appendices 3 and 11 of annex L. Functional Statements for the appendices is insufficient to determine the capability for transporting contaminated individuals to medical facilities. Either the functional statements should be expanded to include this or appendices 3 and 11 made available for review. If this is local plan responsibility for addressing, O.K. Needs clarifications.

M. Recovery and Reentry Planning and Postaccident Operations

1. State plan part 3, describes concept of operation by the State for recovery and reentry following a disaster. Annex L, Appendix 7, Procedures 1-5. The Emergency Management Council supervises all disaster recovery operations. Division of Emergency Management is focal point for managing all phases of disaster operations. Bureau of Radiation Control (accident assessment team) makes assessment and recommendations to Council. Procedures for Chapter 1, to Tab 1 describe methodology and reference PAG's.
3. Part 3 of the State Plan references general state procedures for recovery operations. Appendix 7 indicates the Chief of the Bureau of Radiation Control will be responsible for determining when operations may be phased down or concluded.
O.K.

N. EXERCISES AND DRILLS

- 1.a. Annex L. General. Inherent skills maintained day-to-day. Appendix 7 tab 1. VIII of introduction, page 8 indicates all emergency response personnel will receive initial and annual retraining applicable to their duties. Attachment 4 addresses training, drills and exercises both generally and specifically. Exercises are to be in accordance with FEMA requirements.
O.K.
- b. Criteria addressed in tab 1, attachment 4, II.A. No reference to an announced exercise however, indication is that exercises will be in accordance with FEMA requirements.
O.K.
- 2.a. Communications drills adequately addressed. While some drills not conducted explicitly for GNGF accident/incident, in essence capability is exercised through normal day-to-day use more frequently than criteria requires.
O.K.
- 2.e. Appendix 7, tab 1. attachment 4, B.2. p.20 indicates H.P. drills to be conducted semi-annually.
O.K.
- 3.a. Scope of exercises to be in accordance with FEMA requirements. Plan does not specifically address exercise objectives and evaluation but is implied if conducted in accordance with ; EMA requirements.
O.K.
- b. Same as above.
- c. " " "
- e. " " "
- f. " " "
4. Tab 1. Attachment 4, II. A, p. 19 indicates critique will be conducted, evaluation made of exercise comments and necessary plan changes made.
O.K.
5. Tab 1, attachment 4, II, A. p.19 addresses evaluation of observer comments and procedural changes in plans. Plan review and up-date is addressed sufficiently in appendix 7, XI, "Plan Maintenance".
O.K.

O. RADIOLOGICAL EMERGENCY RESPONSE TRAINING

1. Training of state response personnel addressed in annex L. Appendix 7, VIII addresses training of response team members. Tab 1, attachment 4 further addresses training. (Not referenced)
- b. Training of off-site state response personnel sufficiently addressed. Local emergency response personnel training to be addressed in local plans.
- 4.a. Attachment 4 to tab 1 indicates all Bureau of Radiation Control personnel will receive training.
- b. Planners, utility liaison, accident assessment, monitoring, analysis, contamination control, decontamination, medical liaison, instrument calibration and maintenance, public information, logistics support personnel are specifically identified for .. training.
- d. Identified as local plan items of concern
- f. " " " " " " "
- g. " " " " " " "
- j. Local responsibility primarily. DPS to supply capability for communicating emergency information of necessary and for field monitoring teams.
O.K.
5. Plans generally indicate the necessary training to perform assigned duties are inherent in position the individual holds. Tab 1 indicates individuals will receive initial and annual retraining applicable to their duties.
O.K.

P. RESPONSIBILITY FOR THE PLANNING EFFORT: DEVELOPMENT, PERIODIC REVIEW AND DISTRIBUTION OF EMERGENCY PLANS

1. Plan notes responsibility for appropriate training; for planners specifically, they will or have attended FEMA planning course.
O.K.
2. Plans indicate the coordinator, DEM is responsible for overall State Emergency Management Plan. The Chief, Bureau of Emergency Management has planning responsibility for the Health Department. Within the Bureau, the Director, Division of Compliance and Inspection has the authority and responsibility for REP plans.
O.K.
3. Same lines of responsibilities and authorities as above.
O.K.

RESPONSIBILITY FOR PLANNING cont'd

4. Provisions for up-date for all plans. All persons holding plans or having emergency assignments under the plan within the health department will review and make recommendations for changes annually. Same for appendix 7. If no changes needed, certification of currency will be issued annually.
O.K.:
5. Plans will be distributed; changes will be dated and marked to indicate where changes have been made.
O.K.
6. State Plan, part 1. attachment 4 lists state agency and respective annex. Annex 1 references the State Plan and 12 appendices thereto. Appendix 7 notes tabs, while tab 1 consists of chapter(s). Supporting plans will noted.
O.K.
7. Implementing procedures for tab 1 are contained as a separate part of the plan. The procedures are self-explanatory (by name) as to that part of the plan they are designed to implement.
O.K.
8. Table of contents and 0654 cross-reference supplied. While the cross-reference is not a part of the plan, constructed separately for the State Emergency Plan, Annex 1 and Appendix 7 it is more easily referenced by reviewers.
O.K.
10. Telephone numbers of response personnel will be updated annually. SHOULD BE QUARTERLY

John Benton
FEMA R-6

Hood/Somervell Co. REP Plans
Organization

Basic Plan - (2 attachments - organization - court order)

- Annex A - Warning
- Annex B - Communications
- Annex C - Shelter Plan (Not included)
- Annex D - Radiological defense plan (not included)
- Annex E - Crisis Relocation Plan (not included)
- Annex F - Fixed Nuclear Facility Response Plan

Manual of Emergency Procedures (SOP) for Incidents involving the CPSES

(called an addendum to county EOP)

(called an extension of Annex F)

- Section I - Procedures for Executive Group
- Section II - Procedures for Law Enforcement
- Section III - Procedures for Fire & Rescue
- Section IV - Procedures for Hospital/Medical
- Section V - Procedures for Shelter & Transportation
- Section VI - Public Information
- Section VII - Attachments

Attachments

- A. Initial Notification
 - B. EOC
 - C. Verification
 - D. Notification/Communications
 - E. Call List
 - F. Warning
 - G. Evacuation
 - H. Shelter
 - J. Transportation
 - K. Husbandry
 - L. Media
 - M. Government Agencies
 - N. Situation Form
 - O. Protective Measures
 - P. Emergency Actions (PIO)
 - Q. Medical Facilities
 - R. State Disaster Act
- (Attachments above have tabs)

GENERAL COMMENT:

Plan needs to be tabulated for quick reference. Page numbering is inconsistent for base plan. Plan organization is confusing. Either should be two separate plans or organization for 1 plan consistent throughout (eg. 1 warning annex and 1 set of attachments for entire plan).

HOOD/SOMERVELL COUNTY EMERGENCY PLANS

NUREG 0654
ELEMENT

A. ASSIGNMENT OF RESPONSIBILITY

- 1.a. Plans indicate procedures for requesting support from State, Federal or military. Identified at the local level is Hood County and the incorporated cities of Granbury, Tipan and Tolar; and Somervell County and the city of Glen Rose. The Division of Occupational Health and Radiation Control will assist counties with planning and operations relating to fixed nuclear incident.

Okay

- b. County Judge and Mayors of incorporated towns are responsible for emergency measures including requests for assistance. Department/agency responsibilities summarized.

Okay

- c. Primary and support responsibilities of agencies shown in diagram p. 51 (Somervell) P. 52 (Hood)

Okay

- d. County Judge has responsibility for emergency response in the County including unincorporated communities. The mayors of incorporated towns/cities have responsibility in towns/cities. Each city/county agency has director/chief who is responsible for that agency.

Okay

- e. The Sheriff's Office is responsible for 24-hour manning of communications link and warning-technical response by State. Other response (fire, law enforcement, etc.) normal.

Okay

- 2.a. Executive group (mayor/council members and County Judge/Commissioners) represent command and control. A & N, Communications - Sheriff - all major elements addressed - Functional agency responsibility chart included p.51, (Somervell) and p. 52,(Hood).

Okay

- b. Legal basis.

Okay

3. Local plans' cross-reference indicates this element is not applicable. American Red Cross is covered by State, however, local volunteer organizations if they are to be used should have letters or agreements as to what with and how they will respond/assist local governments. School busses are to be used. If these are fiscally independent school districts and busses are either owned by the district or are contract busses and are to be used to evacuate people, letters of agreement may be appropriate. I feel local plans should address this element if any resources are to be used other than those committed by law.

4. County Judges and Mayors of incorporated towns will assure continuity of operations in their respective jurisdictions.

Okay

B. ONSITE EMERGENCY ORGANIZATION

2. While not designated as an element to be addressed in local plans, local governments may wish to include the title of the person from the licensees' facility who is responsible for initiating emergency actions and providing recommendations for protective actions to offsite officials.

C. EMERGENCY RESPONSE SUPPORT AND RESOURCES

- 1.a. Cross reference indicates N/A. Base plan VI, A.1.d. and VIII, indicates County Judges or Mayors may request State, Federal of military assistance through State Disaster Districts. Can local government request Federal or military assistance directly? If so, it should be indicated and the proper procedures for doing so.

Not FEMA
assigned
element

- 2.a. Cross reference indicates this element N/A. Plan should designate local official to serve as representative of local government at the EOF. This doesn't mean a representative must be there; only that a representative may be there if he/she so chooses.

4. Local government relies heavily upon State assistance for technical capabilities. Local resources other than schools and local government not addressed. Letters of agreement with school districts may be appropriate unless school resources have been committed previously through legal instruments.

D. EMERGENCY CLASSIFICATION SYSTEM

3. Incidents occurring at Comanche Peak have been classified consistent with NUREG-0654 criteria and assumedly that of Utility facility operator.
4. Emergency classification system listed and increased readiness action given in basic plan. Lengthy "Manual of Emergency Procedure for Incidents involving the Comanche Peak Steam Electric Station" is included as an addendum to the plan and appears to cover procedures to be employed by various entities consistent with the emergency action level.

E. NOTIFICATION METHODS AND PROCEDURES

1. Procedures for verification are found on pp. 147 and 148. Proper response by organizational entity noted.
2. Page 71 gives procedures for notifying response organizations for unusual event. Similar procedures for all action levels given.
3. Cross reference indicates 'N/A', however, feel this element should be addressed by S and L. I do not find copy of initial emergency message or any indication that local government is aware of the contents of such a message (See p. 156, warning message "similar to")
5. P. 156 addresses type information which might be broadcast to the public in the event of an accident/incident at Comanche Peak.
6. Siren coverage on P. 40 appears to provide notification to the public. Means for providing instructions to the public by EBS or mobile PA units (pp. 157-162)
- E.7. Pp. 227-231 gives sample message format for press for protective measures and evacuation procedures.

F. EMERGENCY COMMUNICATIONS

- 1.a. P.45 indicates sheriff's office to maintain 24 hour per day communications capability. Capability consists of telephone and radio with DPS (currently not with utility).
- b. N/A according to cross-reference however, it should be indicated what provisions are made for communications with contiguous local (county) governments within 50 mile ingestion pathway. (eg. through DPS District Office, Waco).

- c. Cross reference N/A. State responsibility (See comment C.1a.)
- d. Communications from utility is apparently only through DPS District Office to local government at this time. Radiological monitoring teams and communications between teams and local EOC or utility's EOF not addressed at local level. (State responsibility for monitor team communication)

Okay

- e. Plans have sufficient provisions and procedures for alerting emergency response personnel.
2. Plans indicate N/A as does State REP Plans. Local plans should address this element. (Capability to communicate between ambulance/hospital)

G. PUBLIC EDUCATION AND INFORMATION

- 1.a. Public education and information is generally well-addressed.
 - b. I question the need to distribute the information package
 - c. annually to each residence. (IV.A.2,p.118) as changes occur
 - d. or bi-annually would seem more feasible. (Criteria says info will be distributed annually, not necessarily the same info package as the plans imply) The plans also indicate public meetings will be held annually. This is not required but is certainly okay if it is desired by local government.
2. The resident populace appears to be well covered regarding public education and information. I do not find provisions for assuring the transient populace has access to such information. Placing signs in public places, hotels, motels, stores, P.O.'s, etc. and publishing of info in telephone directories would be some ways of making the information available to the transient populace.
- 3.a. The Waco District DPS office is noted as the point of contact for the media briefings schedule. The utility's operations facility (EOF) is designated as the site for the city and county news media. The alternate for the city/county will be the commissioners courtroom.
- 4.a. The chief executive of the County (Judge) and the Cities (Mayors) will be spokespersons for their jurisdictions (or their appointed representative)

b. Press briefings will be scheduled and conducted for all news media at which time any exchange of information will occur.

c. The cross reference indicates the county and city will discourage independent news dissemination to the press; this may discourage some rumors, however, there will no doubt be some rumors and unsubstantiated info passed in the event of an accident/incident at CPSES. There should be a telephone number to call or a central location where one can go for factual information and where rumors can be verified or corrected.

5. I do not find specific provisions for programs to acquaint the news media with plans, radiation and points of contact on an annual basis. The plans should provide for this.

H. EMERGENCY FACILITIES AND EQUIPMENT

3. Both counties have established EOC's (Somervell Co. has alternate EOC also).

4. Activation and staffing of EOCs addressed satisfactorily.

7. State Health Department is primarily responsible for monitoring but County RDO will provide assistance if resources are available.

11. Primarily responsibility of State Health Department.

I. ACCIDENT ASSESSMENT

(No FEMA assigned element review)

J. PROTECTIVE RESPONSE

10.a. Maps showing evacuation routes are included but I do not find maps of evacuation areas as such. There is a general lack of precise evacuation procedures in the plans. I assume instructions and procedures including areas to be evacuated will be included in the public information package. Radiological sampling and monitoring points are included in State Plan. I do not find maps of shelter or relocation areas. These may not be needed due to common knowledge of area by all and the low evacuee population. Plans should so state if this is true.

- b. Segmented population totals shown on p. 192.

Okay

- c. Outdoor warning devices to cover entire 10 EPZ. How to locate and warn hard-of-hearing or deaf?

- d. Institutionalized persons compensated for: No mention of hard-of-hearing or handicapped persons not institutionalized.

- f. Decision is State's - County may assist in administration of KI if requested.

- g. Means of relocation is primarily by auto (or school busses if during school). Assumes what few residents who do not have autos, have access to rides with friends, neighbors or relatives. Plans should identify such persons and assure they will be evacuated.

- h. Shelter facilities should be outside the 10 mile EPZ (Glen Rose Senior High is listed as shelter facility)

- i. Projected traffic capacities of roads are cited and supporting studies referenced.

- j. County Sheriff is responsible for control points for evacuation (p. 47) and Tab G. VI indicates control will be maintained over access to evacuated area (cross reference should indicate appropriate procedures which address this element).

- k. The only impediments (highway) noted would be icing or roadways.

Okay

- l. Table 2 - misspelled word. "Area" section is upside down. Summary of evacuation time analysis appears viable considering population.

12. Shelter registration form included in plan as Tab 2 to attachment H. Decontamination procedures seem reasonable. (Where does the temporary clothing come from if individual's clothing is contaminated?)

Not
FEMA

K. RADIOLOGICAL EXPOSURE CONTROL

- 3.a. State responsibility primarily - County RDO may assist.

Okay

4. State responsibility primarily - County RDO may assist.

Okay

L. MEDICAL AND PUBLIC HEALTH SUPPORT

3. Cross reference indicates N/A. State plan implies some local responsibility. Letters of agreement may be appropriate to assure a willingness and capability to accept radioactively contaminated individuals. How many R.C. patients can hospitals accommodate? Do they have capability to monitor?
4. Cross reference indicates p. 3 item f. of plan. This merely indicates the Sheriff's Office has the responsibility to dispatch ambulances. Is this private ambulance service? Does utility have medical transfer capability? If private ambulance service, are personnel trained in handling R.C. patients? How many ambulances are available?

M. RECOVERY AND REENTRY PLANNING AND POST ACCIDENT OPERATIONS

1. Plan indicates procedures and information regarding recovery and reentry will be provided by State Health. State plan does not address details of recovery and reentry such as time phased movement, etc. This decision to be made based on time and circumstance of occurrence?

N. EXERCISES AND DRILLS

- 1.a. Exercising, scenario development and drills are primarily
b. responsibility of State and Utility according to plan;
2.a. however, local plans should address willingness of local
b. governments to participate in exercises and drills noted
and with the frequency recommended by NUREG-0654.
(note communication, medical drills required for locals)
- 3.a. All same as above - Local government plans should indicate
b. its willingness to participate and support where necessary
c. all elements noted that are related to and appropriate for
e. local government.
f.
4. Same as above.
5. Same as above.