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June 17, 1991

Ronald Eaton
NRR, U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Eaton:

Please correct page 5 of the Plymouth Board of Selectmen's remarks on draft report NUREG 1438 (Pilgrim Offsite Emergency Preparedness Task Force) given on June 12, 1991, at the public hearing held at the Sheraton Hotel, Plymouth, Massachusetts. The last sentence in paragraph one, page 5, should end at needs. It now should read "Much work remains to be done on special needs."

I had not been apprised by the Civil Defense Director that Boston Edison Company had offered help with special needs responses. With the additional help, the Civil Defense Director now feels he will be able to meet the July 1, 1991, completion date reflected in your draft report (p. 2-117).

It is the full intention of the Board of Selectmen to move expeditiously to complete the work on the calls to special needs persons by July 1, 1991.

The Board appreciated the opportunity to place our comments on record in the hearing, and we welcome you at any time should you again have occasion to visit or work in our town.

Very truly yours,

Alba C. Thompson, Selectman

ACT/lt

cc D. Hadfield, Civil Defense Director
Boston Edison Company

The identification of the special needs population and the measures to develop suitable strategies to protect such individuals remains a problem for Plymouth which has about 750 known cases including about 175 new additions with 350 still to be contacted. The MCDA and BECO report prepared by Chadwick, Martin and Bailey (PT-46, Attachment 114) was flawed since "It was conducted by the telephone without a telecommunications device for the deaf. Also, such surveys cannot reach the transient population or persons without a telephone." (p. 2-115) Originally the report overlooked several zip codes so that 4,000 p.o. box numbers were left out of the mailings. (p. 2-117) This included Plymouth's Manomet post office and the Long Pond post office. Much work remains to be done on special needs.

The Saguish-Gurnet Implementing Procedure (IP) is still being revised, and interface with Duxbury authorities who would need to assist evacuees during an emergency is still needed. (P. 2-80)

The matter of equipment given to the Town by BECO prior to the coming of BECO Emergency Operations Officer Varley and the subsequent Comprehensive Grant Agreement went into effect, must be resolved. "Before Varley" and "after Varley" has no reference to the need for the equipment nor BECO's responsibility to maintain it. "If this equipment is not maintained satisfactorily, communications failures could result. Therefore, the task force finds "the Planning Standard 10CFR 50.47 (b) (8) is not met until the issue involving maintenance of the portable radios for the police and the pagers for the Fire Department has been satisfactorily resolved. (p. 2-10)" The Town believes the pre-Varley equipment and the post-Varley equipment, all issued on the basis of need, should be maintained by BECO and BECO should be so informed. This maintenance of equipment is absolutely essential to a state radiological emergency preparedness. The Town could not possibly meet the objectives of the NRC graded drill scheduled for December 1991 or any other real life emergency without its equipment in preparedness status. (See Summary of Findings p. 1-6, particularly Findings one and two.)

The Town still has many doubts arising out of the BECO transportation matrix, particularly letters of agreement with bus providers (LOA) signed "without any indication of this person's position or title" (p. 2-130) and which "were not clear, concise or consistent." (p. 2-131) The statement of bus provider representatives that "they believed that all drivers would respond" (p. 2-131) during an emergency has always been a debatable point. Letters of agreement from trained bus drivers would be eminently preferable, and we urge the task force to recommend this action. Two outside buses sent into Plymouth during the NRC drill of October 1989 and used to demonstrate response was hardly a test. The exercise of December 1991 must be strengthened in that regard. In fact, neither the NRC exercise of 1985 nor the 1989, nor the coming exercise of 1991 were scheduled during a summer month when