

ORIGINAL

BOSTON EDISON

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U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
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DRAFT REPORT FOR COMMENT, "FINDINGS ON ISSUES OF
OFFSITE EMERGENCY PREPAREDNESS FOR
PILGRIM NUCLEAR POWER STATION" - NUREG-1438

Boston Edison has reviewed the draft NRC Task Force report entitled "Findings on Issues of Offsite Emergency Preparedness for Pilgrim Nuclear Power Station" - NUREG-1438. Enclosed is a report containing Boston Edison's comments on NUREG-1438. The enclosed report represents the results of our initial reviews. It does not contain all of our comments on, or responses to the Task Force Report as explained more fully in the introductory section of the text.

I will continue my personal involvement in resolving all legitimate issues in accordance with the commitment of Boston Edison's Board of Directors and senior management.

If you have any questions, please feel free to call me or Ron Varley at 508-747-9464.


G. W. Davis

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Enclosure

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BOSTON EDISON COMPANY COMMENTS
ON NUREG-1438 (DRAFT REPORT FOR
COMMENT) "FINDINGS ON ISSUES OF
OFFSITE EMERGENCY PREPAREDNESS
FOR PILGRIM NUCLEAR POWER STATION"

I. Introduction

On May 28, 1991, the NRC Task Force on Pilgrim Offsite Emergency Preparedness (Task Force) released NUREG-1438 (Draft Report for Comment) -- the report containing the results of the Task Force's exhaustive seven month investigation into the current status of the offsite emergency response program for the Pilgrim Nuclear Power Station (Pilgrim). The Task Force's charter was to review "issues in dispute" raised at the NRC's September 6, 1990 public meeting in Plymouth, Massachusetts and identified through other sources, determine the factual status of the issues, identify and assess the significance of any problems with the offsite emergency response program, and recommend whether the NRC should reconsider its existing finding that the state of emergency preparedness provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at Pilgrim. Task Force Report at p. 1-2.

Provided below are Boston Edison Company's comments on draft NUREG-1438. This report represents the results of our initial reviews of the draft Task Force Report. It does not contain all of our comments on, or responses to, the Report. For example, as discussed in more detail below, draft NUREG-1438 contains numerous recommendations for action that could be taken

to further improve the offsite emergency response program for Pilgrim. Boston Edison is examining the Task Force's recommendations carefully and will assist the Commonwealth and the local communities to address, as appropriate, those recommendations. 1/ This report does not identify the specific actions to be taken to achieve that objective, except in certain, identified instances.

The purposes of this document are to: (1) present Boston Edison's general views on the overall content of the Task Force Report; and (2) respond, in particular, to the key findings contained in the Report. As discussed below, Boston Edison believes that the Task Force's review was exhaustive and that its report is comprehensive and well documented. Draft NUREG-1438 authoritatively addresses numerous longstanding issues. Furthermore, it validates Boston Edison's view that the issues identified in the Federal Emergency Management Agency's (FEMA) August, 1987 "Self-Initiated Review" (SIR) have been thoroughly addressed. The Task Force's findings clearly confirm that the offsite radiological emergency response program for Pilgrim provides reasonable assurance that adequate protective measures

1/ One of the Task Force's recommendations addresses Boston Edison's procedures for emergency classification, offsite notification and use of the direct torus vent. Task Force Report at p. 2-165. Although Boston Edison believes that existing controls are adequate to ensure that emergency classification and offsite notification will precede use of the direct torus vent, we will discuss this issue further with the NRC Staff.

can and will be taken in the event of a radiological emergency at Pilgrim.

As Boston Edison has stated on many occasions in the past, the views expressed in this document do not necessarily reflect those of the Commonwealth or the local communities. We appreciate the opportunity to comment on the draft Task Force Report and look forward to utilizing the Task Force's input in further improving the offsite program for Pilgrim.

II. General Comments on the Draft Report

A. Scope of the Review

NUREG-1438 represents the culmination of an intensive, seven month investigative effort in which Commonwealth and local officials and interested local citizens were interviewed, numerous site visits were made to emergency operations centers (EOCs), reception centers, and other facilities, and extensive information was collected. During this time, the offsite emergency response program for Pilgrim was subjected to unprecedented scrutiny.

For example, the Task Force spent considerable effort evaluating the detailed mobilization time data contained in transportation provider letters of agreement (LOAs), assessing the results of the Chadwick, Martin, Bailey survey of the special needs population, and evaluating the adequacy of emergency facilities and equipment. To the best of our knowledge, collection and documentation of detailed mobilization time data

for individual transportation providers is an atypical, if not unique, aspect of the Pilgrim offsite emergency response program. Such data (which is not required by applicable federal regulations but which serves to provide a more comprehensive planning basis) would not even be available for review in many other offsite emergency response programs.

Similarly, the Task Force examined in detail the Chadwick, Martin, Bailey special needs survey. That survey, commissioned by the Commonwealth of Massachusetts and funded by Boston Edison, involved a state-of-the-art assessment of the size and characteristics of the special needs population specific to the Pilgrim Emergency Planning Zone (EPZ). We are not aware of another study of its kind in the country in which detailed statistics were compiled on the special needs characteristics of a particular EPZ population.

The Task Force spent considerable time evaluating the adequacy of emergency facilities and equipment. Over the last several years, Boston Edison has expended close to \$20 million in support of the offsite program, a portion of which has gone to renovate or construct new EOCs and reception centers in the local communities and Massachusetts Civil Defense Agency (MCDA) Area II, and to purchase considerable amounts of emergency equipment. The pre-existing capabilities of local response organizations have been dramatically upgraded. Boston Edison has, in addition, clearly demonstrated its long term commitment to the offsite program through binding agreements for the life of the plant to

purchase and maintain large amounts of equipment. We believe that the level of Boston Edison's financial support for the offsite program is unprecedented. More importantly, that support coupled with the pre-existing resources available to the Commonwealth and local communities, provides a strong and effective emergency response capability.

B. Resolution of Issues

Overall, draft NUREG-1438 is comprehensive and well documented. The Report states that "[m]any issues were clarified and dispelled as a result of information gathered by the task force." Task Force Report at p. 1-6. Boston Edison agrees. In particular, the Report concludes that most of the matters raised at the September 6, 1990 public meeting and through other sources have been adequately addressed in the existing offsite emergency response program. For example, the Report concludes that:

- ° Current plans for monitoring, as necessary, Duxbury school children at the reception center are acceptable (Task Force Report at p. 2-42);
- ° Current plans are adequate and provide practical and feasible measures for protecting the public on Saguish Neck, Gurnet Point and Clark's Island (Task Force Report at pp. 2-74 and 2-82);
- ° The Pilgrim Station Evacuation Time Estimates (ETE) meet the standards of NUREG-0654 (Task Force Report at p. 2-84);

- ° Adequate programs are in place for identifying and assisting the special needs population (Task Force Report at p. 2-119 and 2-122);
- ° Adequate transportation resources are available to evacuate the transportation dependent population (Task Force Report at p. 2-146);
- ° The 1991 Public Information Calendar satisfies applicable regulatory requirements and guidance (Task Force Report at p. 2-149); and
- ° The Pilgrim plume exposure EPZ meets the requirements of applicable NRC regulations (Task Force Report at p. 2-153).

These and many other aspects of the Report demonstrate that numerous longstanding issues have been addressed in the existing offsite emergency response program. These issues include, among others, those identified by FEMA in its August, 1987 SIR. The SIR identified the following six areas of major concern:

- ° Lack of evacuation plans for public and private schools and daycare centers.
- ° Lack of a reception center for people evacuating to the north.
- ° Lack of identifiable public shelters for the beach population.
- ° Inadequate planning for the evacuation of the special needs population.
- ° Inadequate planning for the evacuation of the transport dependent population.

- ° Overall lack of progress in planning and apparent diminution in emergency preparedness.

(SIR Report at p. 1). As briefly summarized below, the Task Force Report demonstrates that these concerns have been adequately addressed.

1. Lack of Evacuation Plans for Public and Private Schools and Day Care Centers

The Task Force examined the status of planning for schools in each of the EPZ communities including issues associated with applicable procedures, transportation resources, and equipment. Although the Task Force recommends various actions to achieve program improvements, the following statements are representative of the Task Force's basic conclusions:

- ° "[N]o serious shortcomings were found" in the Plymouth school procedures (Task Force Report at p. 2-14);
- ° "[T]he issue of lack of an approved plan for Carver school children has been resolved . . ." (Task Force Report at p. 2-23);
- ° "[T]he current [Kingston] school procedure . . . is not inconsistent with any existing planning standards or guidance criteria" (Task Force Report at p. 2-29); 2/
- ° "The Town of Needham has agreed [to provide Needham High School as a host school for Duxbury students], the training of Duxbury and Needham school personnel has

2/ See Task Force Report at pp. 2-26 and 2-27 which discusses the Task Force's findings regarding a backup communication system for the Kingston School Department.

begun, and the State, Needham, and BECo have signed a letter of agreement" (Task Force Report at p. 2-42); and

- ° "MCDA's acceptance of Furnace Brook School as a host school for Marshfield schools supports the resolution of the Marshfield host-school issue" (Task Force Report at p. 2-53). 3/

2. Lack of a Reception Center for People Evacuating to the North

The Task Force evaluated the Wellesley reception center and its associated EOC, including facilities, equipment and staffing. It found that the reception center and EOC are in place and functionally equipped, and stated that they will be evaluated further in the next exercise. The Task Force recommended that an additional portal monitor be moved to the Wellesley facility. That has been accomplished. The Task Force also found that the reception center is accessible to the handicapped. Task Force Report at pp. 2-95 and 2-96. Furthermore, staffing is adequate to enable the facility to monitor 20% of the evacuating population in about 12 hours, in accordance with existing FEMA guidance. Task Force Report at p. 2-99.

3/ See Task Force Report at p. 2-47 discussing the Task Force's findings regarding an additional CB radio for one of the Marshfield schools.

3. Lack of Identifiable Public
Shelters for the Beach Population

The Task Force found that the local communities "have planned for the option of sheltering the population including the beach population and other transient summer populations," and that procedures "provide for the implementation of" a sheltering recommendation. . . . (Task Force Report at p. 2-150). 4/

4. Inadequate Planning for the Evacuation
of the Special Needs Population

The Task Force Report concludes that:

The enhanced self-identification program, coupled with the provision in the plan calling for persons with special needs to contact their town's emergency operations center should they need assistance during an emergency, is sufficient to adequately identify persons with special needs as called for in the Federal guidance in NUREG-0654 and FEMA GM-24.

Task Force Report at p. 2-119. It also found that:

adequate transportation sources had been identified for persons with special needs on the basis of the Chadwick, Martin and Bailey study and the old [special needs] lists [and that] [p]ersons confined to institutions within the EPZ are adequately defined and their needs adequately assessed by town planners.

4/ The Task Force does recommend that additional guidance be incorporated into Commonwealth procedures to assist in selecting the most appropriate protective action recommendation (i.e., sheltering or evacuation). Task Force Report at p. 2-151. This is discussed further at p. 33 below.

Task Force Report at p. 2-122. 5/

5. Inadequate Planning for the Evacuation
of the Transport Dependent Population

The Task Force Report states, among other things, that:

the total number of buses, vans, lift vans, ambulances, and drivers that would be needed to evacuate the identified transportation-dependent populations would be available from among those committed in letters of agreement. The task force also found that the total number of buses, vans, lift vans, and drivers needed for a precautionary evacuation of the schools and day care centers located within the Pilgrim EPZ had been identified in sufficient numbers. The above conclusion is true for both operating hours and non-operating hours of the transportation providers.

Task Force Report at p. 2-146.

6. Overall Lack of Progress and Apparent
Diminution in Emergency Preparedness

The August 1987 SIR criticized the Commonwealth for lack of progress in maintaining the offsite program. Since that time, there have been dramatic program improvements. Both the Task Force review and the most recent exercises demonstrate that those improvements have been achieved.

5/ See pp. 30-32 below regarding the Task Force's findings on incorporation of the Self-Identification Program results into local special needs lists.

III. Boston Edison Response to Key Findings

Given the scope of the Task Force's review effort, and the fact that emergency preparedness is not static, but a fluid process, it is not surprising that some areas for further attention were identified and that other recommendations were made for program improvements. The Report identifies five general areas that "warrant attention before the next full participation exercise in December 1991," and contains other recommendations for action throughout the text. The five areas are:

- ° Emergency notification communications equipment (e.g., pagers and radios) for some emergency response personnel in some towns need improvement.
- ° Responsibility for maintenance of some emergency response equipment in some towns needs to be resolved.
- ° Participation in training for offsite emergency response personnel needs to be substantially increased.
- ° State and some town civil defense agencies need to incorporate results from the self-identification program survey into their lists of persons with special needs and provide for regular maintenance of those lists.
- ° Plans and implementing procedures for the Massachusetts Civil Defense Agency (MCDA) and the Department of Public Health and MCDA Area II need to be made consistent with those of the local communities.

- Transportation procedures need to be better coordinated among MCDA Area II, transportation providers, and the towns.
- State plans need specific procedures to guide officials who must make protective action decisions.

Task Force Report at p. 1-6.

Each of these five basic recommendations appears to be derived from more specific underlying factual findings contained in the Task Force Report. This section provides additional information on those underlying findings. Boston Edison's plans for assisting offsite authorities in addressing the five general areas are presently being developed. Boston Edison will work with and support Commonwealth and local officials to address, as appropriate, the five areas identified for attention as well as the Task Force's other recommendations. We have discussed this matter with MCDA and have agreed to work together to achieve that objective.

We believe that in several of these areas, cooperative efforts since the completion of the Task Force's investigations in the field have resulted in resolution of the issue or significant progress to that end. For example, additional communication equipment is being installed in Kingston and modifications will be completed in Marshfield. The administrative procedures which will assist in maintaining the program and coordinating the various efforts are in the review

process in the Commonwealth. We have met with Town officials to review outstanding requests and discuss solutions for the remaining issues; and we will continue to do so.

Before discussing the specific findings which appear to underlie the Task Force's five basic recommendations, Boston Edison has several general comments on the implications and significance of the Task Force's findings. First, several of the Task Force's findings discuss the provision or maintenance of certain specific pieces of emergency response equipment (e.g., radios, pagers). As a general matter, we do not believe that there has been a failure to meet the emergency planning standards embodied in NRC regulations. The pre-existing capabilities of the offsite authorities have been dramatically enhanced over the last several years. Overall, ample resources have been provided to support an effective emergency response. While additional resources may in some specific instances be desirable, it does not follow that sufficient equipment to support an effective emergency response has not been provided.

Second, to the extent that the Task Force has recommended actions which are not required of other offsite emergency response programs, it has, in effect, created new regulatory criteria specifically applicable to Pilgrim. For example, several of the Task Force's findings state that NUREG-0654, Evaluation Criterion F.1 (governing the provision of primary and backup means of communication for licensees and response organizations) has not been met due to the failure to

provide or maintain pagers for certain emergency response personnel. We do not believe that the criterion for primary and backup communications applies to individual emergency workers as opposed to communications among principal response organizations. NUREG-0654, Evaluation Criterion F.1 specifically states that "Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations." 6/

Finally, as the NRC is aware, radiological emergency planning programs are fluid and must continuously deal with changing circumstances. At any given time, it is inevitable that some program elements will require improvement, updating or modification. For example, equipment such as radios or pagers may require repair or replacement. The need for such changes, however, does not necessarily represent a failure to meet regulatory requirements. Furthermore, in many instances, various

6/ In Long Island Lighting Co. (Shoreham Nuclear Power Station, Unit 1), LBP-85-12, 21 NRC 644, 739, 991-92, aff'd, ALAB-818, 22 NRC 651 (1985), the Board examined a contention alleging that backup communications were required between EOCs and emergency field personnel (e.g., survey teams, traffic guides, staging area coordinators) and stated:

[W]e find no reference to the necessity for backup communications systems in NUREG-0654, II.F.1.... Reliance on that section may well be misplaced since we are unable to find a requirement even for a primary communications system to be used by rank-and-file emergency workers in the field.

The Board concludes that there is no regulatory basis for requiring backup channels for LILCO's emergency radio system.

options are available to address a perceived planning problem. Alternatives to the purchase of substantial amounts of new equipment may include procedural changes, reassigned responsibilities, additional training or other program changes.

The specific findings underlying the Task Force's five general recommendations are discussed below.

A. Replacement Batteries For Police Department Radios and Fire Department Pagers in Plymouth

According to the Task Force Report, in meetings between the Task Force and officials from the Town of Plymouth, the maintenance of portable Police Department radios and Fire Department pagers provided by Boston Edison was identified as an issue. Task Force Report at pp. 2-6 to 2-12. The Town of Plymouth (which uses this equipment on a day-to-day basis) has stated that it does not have the necessary funds to replace the batteries. While this equipment was provided to the Town by Boston Edison, it is not encompassed by the applicable Comprehensive Grant Agreement. As reflected in the attached letters (Attachments 1 and 2), with regard to the Fire Department pagers, the Plymouth Fire Chief previously agreed that his Department would be responsible for maintaining the pagers.

In its assessment of this issue, the Task Force stated that 10 CFR § 50.47(b)(8) will not be met until the issue involving the maintenance of the Police Department radios and the

Fire Department pagers has been satisfactorily resolved. Task Force Report at p. 2-10. Section 50.47(b)(8), states:

(8) Adequate emergency facilities and equipment to support the emergency response are provided and maintained.

On May 3, 1991, Boston Edison Emergency Preparedness Department personnel met with officials from the Town of Plymouth to discuss, among other things, this issue. At this meeting it was agreed that the Plymouth Civil Defense Director would provide Boston Edison with more detailed information on what the Town views as its specific needs regarding the replacement batteries. Boston Edison will review the information upon receipt and anticipates that a mutually agreeable resolution of this issue can be achieved.

In any event, Boston Edison believes that the prospective need to replace batteries for police department radios and fire department pagers does not mean that adequate equipment is not presently being provided and maintained.

**B. Additional Training Progress in the Towns of
Plymouth, Kingston, and Duxbury**

According to the Task Force Report, in meetings between officials from the Towns of Plymouth, Kingston, and Duxbury, and the Task Force, the percentage of emergency worker training completed was raised as an issue. Task Force Report at pp. 2-15, 2-30, and 2-44. The Task Force reviewed the training data contained in the Commonwealth's 1990 Annual Letter of

Certification (ALC) for the Pilgrim Nuclear Power Station, and concluded that Evaluation Criterion 0.5 of NUREG-0654 was not met in each of the three Towns for 1990. Task Force Report at pp. 2-16, 2-30, and 2-44. Evaluation Criterion 0.5 states that:

5. Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

The Task Force's conclusion was based on a determination from information in the ALC that the overall percentage of training hours completed in each of the three Towns was low. This overall percentage is based on the number of training hours assigned versus the number of training hours completed. As discussed below, Boston Edison believes that the summary data contained in the ALC does not provide a full picture of the status of training progress, ^{2/} and that NUREG-0654, Evaluation Criterion 0.5 was met in 1990.

Training of the approximately 4,000 - 5,000 emergency workers, teachers and transportation providers is carried out pursuant to the Commonwealth's comprehensive training program which Boston Edison assisted in developing. The training program consists of training modules which contain one or more lesson plans. Lesson plans are tailored to relate to a particular emergency response action by an emergency worker using an implementing procedure. This might include hands-on training for the use of a particular piece of equipment like a dosimeter,

^{2/} The Task Force acknowledged the difficulty in interpreting the training data. (Task Force Report at p. 2-44).

survey meter, portal monitor, or a radio. It could also include training in such skills as how to fill out a form, read a map, or handle a contaminated injured individual. Training also includes classroom sessions which review implementing procedures and emergency response actions. Additionally, an emergency worker must receive training in "Introduction to Radiation" and "Introduction to Emergency Response." Exercise practicals and drills are also part of the training program. These enable individuals to practice the skills they have learned.

Also included as a part of the comprehensive training program is a program called "Instructor Certification Program" which includes a Train-the-Trainer program for instructors consisting of classroom training, classroom presentation and an evaluated field presentation. Candidates include personnel from the Commonwealth, local communities, and the Boston Edison Emergency Preparedness Department staff. All candidates must be approved by the MCDA Training Coordinator prior to instructing a training course.

Boston Edison also compensates emergency workers from the five EPZ towns, two reception center communities, as well as volunteers and teachers who receive training. Finally, the elements of the training program are reviewed and updated annually. Thus, a detailed and comprehensive training program has been established and is being implemented.

Classroom training under the above described training program was offered by the Commonwealth during 1990 to the

various organizations within the towns which play an emergency response role. The hours required to complete this classroom training appear in the "hours assigned" column in the ALC and were offered during 1990. However, another type of training which also is included in the "hours assigned" column of the ALC and was not offered during 1990 is the conduct of "practicals" and drills in preparation for the biennial exercise to be conducted in December 1991. As part of the regular training cycle, which is geared to the biennial exercise requirement, practicals and drills are offered in the year of an exercise and are typically conducted in the months leading up to the exercise. Therefore, the figures reflected in the ALC represent approximately the midpoint of the training cycle, and the fact that drills and practicals were not scheduled to be conducted until sometime in 1991 makes the overall percentage of training hours completed in 1990 appear somewhat lower.

Additionally, the percentage of training hours completed in 1990 appears lower because the towns assign and train more individuals than are necessary to support a response. A good example of this occurs in the Town of Duxbury. As reflected in the ALC, although the Duxbury emergency response organization requires 155 people, 195 personnel have been assigned and 142 of the personnel have been trained. Thus, the percentage of persons required to carry out the emergency response that have been trained is higher than the percentage of persons "assigned" that have been trained.

Furthermore, while the NRC regulations and guidelines establish that offsite workers be provided with training, they do not require that any particular percentage be trained at a given time or that the training organizations assure that such training is accepted by individual emergency workers. E.g. Shoreham, 21 NRC at 754-55 (1985). Therefore, based on the information provided above, Boston Edison believes that Evaluation Criterion 0.5 has been satisfied.

C. Maintenance of Carver Fire Department Pagers

According to the Task Force Report, in meetings between the Task Force and officials from the Town of Carver, the maintenance of Fire Department pagers provided by Boston Edison was identified as an issue. Task Force Report at pp. 2-17 and 2-18. In particular, the Carver Fire Chief stated that approximately 50 pagers provided by Boston Edison in 1982, (before the Comprehensive Grant Agreement went into effect) are outdated and unreliable, and that the Town will no longer be able to maintain the pagers at its own expense. Based on these statements, and Boston Edison's position that it is not responsible for their maintenance, the Task Force determined that 'the maintenance aspect of 10 CFR § 50.47(b)(8) is not met.' Task Force Report at p. 2-20.

As stated above, 10 CFR § 50.47(b)(8) provides that:

(8) Adequate emergency facilities and equipment to support

the emergency response are provided and maintained.

Boston Edison believes that this provision has been satisfied. The Task Force appears to have based its assessment on statements from Carver officials that the Town will not maintain the Fire Department pagers which it uses on a day-to-day basis for emergencies. However, as noted by the Task Force Report, in September 1989, the Town's Executive Secretary requested that the Comprehensive Grant Agreement be reopened because, due to budget constraints, Carver would not be able to maintain the Fire Department pagers. In a letter dated April 19, 1990, from the Fire Chief to the Executive Secretary, the Fire Chief stated that the pagers continued to be maintained since July 1989. Task Force Report at p. 2-17. Furthermore, as discussed above, provision of additional equipment is not necessarily the only means of addressing a perceived planning problem. In the case of the Carver Fire Department's responsibilities, use of a "call-tree" would be adequate. 8/ Boston Edison believes that the prospective need to maintain the pagers does not represent a failure to satisfy 10 CFR § 50.47(b)(8).

8/ Use of such systems has been found acceptable in other instances. E.g., Shoreham, 21 NRC at 714.

D. Radio Frequencies at the Kingston Transportation Staging Area

According to the Task Force Report, in discussions between the Task Force and officials from the Town of Kingston, the assignment of radio frequencies by MCDA to radios at the Kingston Transportation Staging Area (TSA) was identified as an issue. Task Force Report at p. 2-26. In its assessment of this issue, the Task Force noted that Boston Edison has provided the necessary radios to Kingston in order to establish communications between the TSA and the Kingston EOC. However, since MCDA representatives are contemplating the assignment of a separate radio frequency for each Town to communicate with its TSA, according to the Task Force Report, NUREG-0654, Evaluation Criterion F.1 will only be met when the new frequency in Kingston is assigned and incorporated into the radio network. Task Force Report at p. 2-27.

Evaluation Criterion F.1 in NUREG-0654 provides that:

1. The communication plans for emergencies shall include organizational titles and alternate for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees, local, and State response organizations. Such systems should be selected to be compatible with one another . . .

Boston Edison believes that the offsite emergency preparedness program for Pilgrim currently satisfies Evaluation Criterion F.1 with respect to communications between the Kingston TSA and EOC. There is currently in place a radio system for use in communicating between the TSA and the EOC which was installed by

Boston Edison to address this concern. In addition, during the 1989 exercise, FEMA's Exercise Objective 4 for communications at the Kingston TSA was met.

Therefore, based on the above, Boston Edison believes that the communications system currently in place at the Kingston TSA for use in contacting the Kingston EOC is adequate and complies with Evaluation Criterion F.1.

E. Backup Communications for the Kingston School Department

According to the Task Force Report, in a meeting between the Task Force and officials from the Town of Kingston, an issue concerning backup communications for the Kingston School Department was discussed. Task Force Report at p. 2-26. In particular, the Task Force learned that the Town of Kingston and Boston Edison had reached an agreement under which Boston Edison would provide the Town with a backup communications system consisting of citizens band (CB) radios for the Kingston High School, Kingston Elementary School and Sacred Heart Parochial School, which will be tied to a base station in the Superintendent's office.

At the time the Task Force released its report, all of the CB radio equipment for this system had not yet been delivered. Therefore, the Task Force concluded that 10 CFR § 50.47(b)(6) and Evaluation Criterion F.1 in NUREG-0654 would be met when the radios were delivered. Boston Edison does not

believe that either Section 50.47(b)(6) or Evaluation Criterion F.1 contemplate provision of backup communications equipment among individual schools or other similar special facilities. In our view, these regulatory criteria apply only to response organizations. In any event, the last piece of equipment for the backup radio communications system for the Kingston School Department is being installed by Boston Edison as a program enhancement. Therefore, this issue has been resolved.

F. Range of Pagers for Duxbury Selectmen

According to the Task Force Report, in meetings between the Task Force and officials from the Town of Duxbury, an issue concerning the range of the pagers used by the Duxbury Selectmen was identified. Task Force Report at pp. 2-32 and 2-33. In particular, the Duxbury Civil Defense Director stated that the radio pagers provided by Boston Edison only have a range of 10-12 miles and are unable to reach the three Duxbury Selectmen when they are at their jobs outside of the Town. Task Force Report at p. 2-32.

In its assessment of this issue, the Task Force stated that:

Section II, Part E, paragraph 2.f of the Town of Duxbury Radiological Emergency Response Plan for the Pilgrim Nuclear Power Station, Rev. 7, dated December 1, 1989, states that individuals in the Town's emergency response organization will be contacted using commercial telephones and told to report to the EOC, that pagers or radio systems will be used as backup means of notification, and that all key members of the Civil Defense Agency

and their alternates should have pagers. Section I, Part A, paragraph 4.(a)1(a), of the plan states that the Board of Selectmen will provide overall supervision of the emergency response.

Task Force Report at p. 2-36.

The Task Force found that Boston Edison had provided radio pagers to emergency response personnel in Duxbury and that the pagers assigned to the three Selectmen and Health Officer did not have sufficient range. Task Force Report at p. 2-36. Next, the Task Force noted that NUREG-0654 Evaluation Criterion F.1 states that a primary and a backup means of communication are necessary and that Evaluation Criterion E.2 states that each organization shall establish procedures for alerting and mobilizing personnel. The Task Force concluded that "[t]he provisions of the plan and the regulatory guidance regarding a backup means for notifying the Selectmen and the Health Officer have not been met." Task Force Report at p. 2-36.

Only one Selectman and Health Officer is needed at the EOC during an emergency. If for some reason the first Selectman cannot be contacted by commercial telephone and does not respond to a page, the second or third Selectman could most likely be reached by telephone or pager. The same holds true for the Health Officer's position at the EOC, because there are two individuals trained for this position. If the first Health Officer cannot be reached by telephone or pager, then the second individual trained to fill the Health Officer's position (who works in the Town of Duxbury) could be contacted.

It should be noted that, the Duxbury Selectmen and Health Officer have for the past several months been leasing "commercial" pagers with a broader range and that, therefore, the Town has resolved this issue on its own.

G. Portable Radios for the Duxbury Lifeguards

According to the Task Force Report, in a meeting between the Task Force and officials from the Town of Duxbury, the need for portable radios for the Duxbury lifeguards was identified as an issue. Task Force Report at p. 2-34. In particular, the Town believes that since the lifeguards assist the Duxbury Conservation Department in conducting a precautionary clearing of the beaches at the Alert emergency classification level, the lifeguards need portable radios to carry out this task.

In examining this issue, the Task Force concluded that since "the lifeguards function as emergency workers, they should have communications to meet the intent or guidance in Evaluation Criterion E.2 and F.1." Task Force Report at p. 2-36.

Evaluation Criterion E.2 provides:

2. Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.

and Evaluation Criterion F.1 provides:

1. The communication plans for emergencies shall include organizational titles and alternates for both ends of the communication links. Each organization shall establish reliable primary and backup means of communication for licensees,

local, and State response organizations. Such systems should be selected to be compatible with one another

Boston Edison believes that the guidance contained in Evaluation Criterion E.2 and F.1 has been met.

An examination of the function carried out by the lifeguards reveals that they do not require radios to assist the Duxbury Conservation Department in clearing the beaches. A precautionary closure of the beaches is performed at the Alert classification level, well before any potential threat of a radiological release would occur. As stated in the current "Beach Alerting Instruction Sheet" used by the Conservation Department, the Beach Alerting Teams are to first notify the lifeguards of the emergency condition and direct the lifeguards to assist them in clearing the beach. Then the Teams are to begin clearing the beaches by broadcasting the appropriate message contained in the "Beach Alerting Instruction Sheet." (See Town of Duxbury IP-15 (Draft-6, January 21, 1991), entitled "Conservation Department," Attachment 2. Thus, the lifeguards are notified of the emergency condition and directed to assist in clearing the beaches by the Conservation Department Beach Alerting Teams before any messages are broadcast to the general public.

Therefore, Boston Edison believes that the Duxbury lifeguards do not need portable radios to assist the Conservation Department in clearing the beaches and that adequate procedures

have been established in accordance with Evaluation Criterion E.2 and F.1 to notify and mobilize the lifeguards.

H. Marshfield School Department CB Radio and Antenna for the TSA

According to the Task Force Report, in meetings between the Task Force and officials from the Town of Marshfield, the need for a CB radio for one of the schools and an antenna at the transportation staging area were identified as issues. Task Force Report at p. 2-47. In assessing these issues, the Task Force stated that Boston Edison intends to provide this equipment to the Town. According to the Task Force, once this equipment has been provided, 10 CFR § 50.47(b)(6) and (8) will be met.

Boston Edison was first made aware of the desire for a CB radio at the school at the meetings between the Task Force and Town officials. Boston Edison intends to provide a CB radio for the school as a program enhancement.

With regard to the antenna at the TSA, Boston Edison has installed three antennas at the Marshfield TSA for use in emergency response. In addition, as a courtesy to the Town of Marshfield, Boston Edison relocated an existing Town antenna which is not used for Radiological Emergency Response Plan purposes on top of the TSA building. Therefore, these issues have been resolved.

I. Bridgewater Pagers

According to the Task Force Report, in meetings between the Task Force and officials from the Town of Bridgewater, an issue concerning pagers provided by Boston Edison to the Town was identified. In assessing this issue the Task Force noted that Implementing Procedure IP-07 for the Town of Bridgewater Fire Department (Draft 6, June 15, 1990) states that in the event of an emergency at Pilgrim, the fire dispatcher performs an "all call" page of the 26 names on the pager notification list. Task Force Report at p. 2-105. Apparently some of the individuals on the all call list may live or work outside the radio range of the pagers. Therefore, the Task Force determined that the provisions of the plan and the regulatory guidance regarding a primary means for notifying and mobilizing emergency response personnel are not met. Task Force Report at pp. 2-105 and 2-106.

For those individuals who for whatever reason do not respond to the "all call" page, the fire dispatcher has their work and home telephone numbers so that they can be contacted. In addition, as discussed above in the section examining the Duxbury pager issue, there is more than one individual slotted to fill each key position in the Bridgewater emergency response organization. If the first person to fill a particular position cannot be contacted for some reason, then the other individual slotted to fill that position could be contacted. The redundancy of personnel in place at the local EOCs serves as an additional backup. This issue could also be addressed by changing the

Town's procedures, to make the commercial telephone the primary means of alerting individuals.

Therefore, Boston Edison believes that adequate procedures are in place for alerting, notifying, and mobilizing emergency response personnel in Bridgewater.

J. Special Needs Self-Identification

The Task Force Report discusses the enhanced self-identification program (SIP) survey conducted by MCDA with Boston Edison support. The purpose of the SIP was to improve upon the existing methods of collecting data on the names, addresses and needs of the special needs population in the EPZ. Task Force Report at p. 2-115. Those existing methods relied primarily on mail-in cards attached to annual public information brochures -- a practice utilized throughout the country as the primary means of collecting such information. The Task Force Report notes the concerns of some local officials that special needs persons are reluctant to identify themselves and that not all such persons would respond to the mail-in card.

The Task Force found that:

The enhanced self-identification program, coupled with the provision in the plan calling for persons with special needs to contact their Town's emergency operations center should they need assistance during an emergency, is sufficient to adequately identify persons with special needs as called for in the Federal guidance in NUREG-0654 and FEMA GM-24. The mail-in card system is an accepted practice.

Task Force Report at p. 2-119. However, because the Towns of Plymouth and Duxbury had not completed incorporating the SIP results into their special needs lists, the Task Force recommends that such results be incorporated before the next exercise.

Boston Edison agrees that incorporation of the SIP results into all of the special needs lists should be promptly completed. In fact, Duxbury has completed the incorporation of the SIP results into its special needs list. In addition, Boston Edison has agreed to assist MCDA in meeting its commitment to incorporate the SIP results into the Plymouth special needs list by July 1, 1991.

However, the concerns expressed about the pre-existing lists (e.g., reluctance to self-identify) are not particular to the Pilgrim EPZ and should apply equally to any other special needs identification program. Furthermore, to the extent that particular individuals have not come forward and identified themselves prior to an emergency, as the Task Force noted, a system is in place for real-time self-identification (and provision of necessary resources) during an emergency. In addition, use of public information brochure mail-in cards as the primary means of pre-identifying persons with special needs is the common method utilized throughout the country and is recommended by FEMA guidance. The SIP was conducted to implement recommendations from the Chadwick, Martin, Bailey study and represents an enhancement of traditional industry practice.

The Task Force also recommends that Civil Defense officials should provide for regular maintenance of the special needs lists. Task Force Report at p. 1-6. Boston Edison agrees. As the Task Force acknowledged, an Administrative Procedure governing "Special Needs Program Maintenance" has been prepared to provide a uniform, effective maintenance system. Task Force Report at p. 2-117. The procedure is scheduled to be reviewed with MCDA on June 11.

K. Procedural Improvements

The Task Force Report discusses the need for improving the consistency between Commonwealth plans and procedures (MCDA, MDPH and Area II) and local plans and procedures in two areas: (1) better coordination of transportation procedures; and (2) incorporation of specific procedures to guide protective action decision-making into Commonwealth plans. Task Force Report at p. 1-6.

With respect to better coordination of transportation procedures, the Task Force's recommendation appears to be based upon various differences identified among Commonwealth and local procedures and planning documents regarding specific vehicle assignments. Task Force Report at pp. 2-133, 2-134, 2-143 and 2-146. Such differences resulted primarily from the fact that new and revised data cannot be simultaneously incorporated in all applicable Commonwealth and local procedures. Thus, this is essentially an administrative matter that can be addressed, to

some degree, by improved administrative controls. The applicable administrative procedure is scheduled to be reviewed with MCDA on June 11. In any event, the Task Force's fundamental conclusion on the adequacy of the transportation program for the Pilgrim EP2 is that adequate resources have been identified and are available.

The Task Force's recommendation that Commonwealth plans incorporate specific guidance for protective action decision-making addresses MDPH's procedures for responding to accidents at any of the nuclear power plants within its jurisdiction. Boston Edison will work with MDPH to address the Task Force's concern.

IV. Conclusion

As discussed above, the Task Force report is comprehensive and well-documented and authoritatively addresses numerous longstanding issues. The Task Force's findings clearly confirm that the offsite radiological emergency response program for Pilgrim provides reasonable assurance that adequate protective measures can and will be taken in the event of a radiological emergency at Pilgrim. Boston Edison is examining the Task Force's recommendations carefully and will assist the Commonwealth and the local communities in addressing, as appropriate, those recommendations. We appreciate the opportunity to present our views on the draft report.

**BOSTON EDISON**

Emergency Preparedness Department
29 Industrial Park Road
Roslindale, Massachusetts 02126

August 22, 1988
EP88-1011

Chief Eugene Rasori
Plymouth Fire Department
114 Sandwich Street
Plymouth, MA 02360

Dear Chief Rasori:

Boston Edison has evaluated and approved your request for pagers for the Plymouth Fire Department.

I understand the following items were agreed upon at the last meeting between Plymouth Fire Department and my staff, Albert Samano and Marion Gedutis.

1. Boston Edison agrees to purchase:
 - (135) "Minitor II" Alert Monitor Receivers with four call option
 - (135) Single Unit Chargers
 - 5 year Express Maintenance Plan
2. Plymouth Fire Department will own, operate and repair all equipment.
3. Plymouth Fire Department will be responsible for all union grievances.
4. Plymouth Fire Department is responsible for all licensing requirements.
5. Prior to purchase of equipment, Boston Edison agrees to meet with Plymouth Fire Department to finalize equipment specifications.
6. Upon receipt of order by the vendor, there is approximately a sixteen week waiting period.

I would appreciate a written response to ensure agreement with the terms listed above.

Sincerely,



R.A. Varley

Manager - Emergency Preparedness

cc: A. Thompson
D. Hadfield
A. Samano
M. Gedutis

MG/br



PLYMOUTH FIRE DEPARTMENT

CITY OF PLYMOUTH

TEL. 746-3212

August 25, 1988


Ronald A. Varley, Manager
Emergency Preparedness
Boston Edison
59 Industrial Park Road
Plymouth, MA 02360

Dear Mr. Varley:

This is to confirm that I have reviewed and agree to the conditions proposed by Boston Edison in your letter dated August 22, 1988, relating to the purchase of one hundred and thirty five (135) pagers for the Plymouth Fire Department.

These pagers are being provided in conjunction with the Plymouth Fire Departments role in the proposed Radiological Emergency Response Procedure.

Respectfully,


Eugene J. Rasori
Chief of Department

EJR/lk

copies to: Alba Thompson
Douglas Hadfield

RECEIVED

AUG 26 1988

E P GROUP