



Federal Emergency Management Agency

Washington, D.C. 20472

JUN 10 1991

Mr. Frank J. Congel
Director
Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Congel:

As requested in your June 4, 1991, memorandum, the Federal Emergency Management Agency (FEMA) has reviewed a copy of the April 15, 1991, letter and attachment from New Hampshire Yankee (NHY) to the U. S. Nuclear Regulatory Commission (NRC) outlining a transition plan for replacing the Vehicular Alert and Notification System (VANS) with fixed pole-mounted sirens in the Massachusetts portion of the Seabrook Nuclear Power Plant Emergency Planning Zone (EPZ). As explained in the letter and attachment, the transition plan for reinstalling fixed, pole-mounted sirens has been drafted because of an Executive Order from the Governor of Massachusetts to Commonwealth Agencies directing them to ensure the establishment of an effective warning and notification system in the Massachusetts portion of the Seabrook EPZ and because several of the Massachusetts communities, as well as the Massachusetts Civil Defense Agency, have approached NHY regarding the reinstallation of pole-mounted sirens.

Because of the significance of the alert and notification system modifications and the fact that the modifications will affect a large portion of the EPZ population, a full technical review and analysis will have to be conducted by FEMA and our technical assistance contractors before the modifications can be approved in accordance with Title 44 CFR, Part 350; NUREG-0654/FEMA-REP-1, Revision 1, Appendix 3; FEMA REP-10; and FEMA Guidance Memorandum AN-1. A review and analysis of the system modifications will be required in order to continue the September 7, 1990, FEMA approval of the Seabrook alert and notification system.

The transition plan provided by NHY contains only general information on their overall objectives at this point:

- The VANS will be replaced with fixed, pole-mounted sirens to provide the alerting coverage;
- The decibel levels that will be provided by the modified system will be either 60 dBC, 70 dBC, or 10 dBC above background ambient noise levels;

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- The replacement of the VANS with fixed, pole-mounted sirens will take place on a town-by-town basis;
- The siren system modifications will be designed using the same acoustical model as the model used to design the currently installed and approved alert and notification system in both Massachusetts and New Hampshire; and,
- NHY Offsite Response Organization (ORO) activation procedures from the Emergency Operations Center will remain unchanged at this time.

In order for FEMA to review and approve the modified alert and notification system design and implementation, all of the supporting technical data, methods, equipment specifications, and acoustical analyses required in any FEMA REP-10 Design Report submission to document the physical means of alerting must be provided for review. In addition, in the eventuality that the Commonwealth of Massachusetts develops their own offsite radiological emergency response plans, procedures, and capabilities; acquires and dedicates the required facilities and resources; and satisfies the other administrative alert and notification system requirements, documentation would have to be submitted to FEMA at that time, in a FEMA REP-10 Design Report Addendum, to document the administrative procedures. These procedures would have to be reviewed and exercised before approval.

The transition plan seems to indicate that several different analyses or addenda will be submitted for review as the VANS are replaced and fixed, pole-mounted sirens are installed in each town. We would strongly prefer the advance submittal of one comprehensive, FEMA REP-10 Addendum providing an analysis that incorporates, describes, and documents the entire integrated, proposed, new design throughout the entire Massachusetts portion of the EPZ.

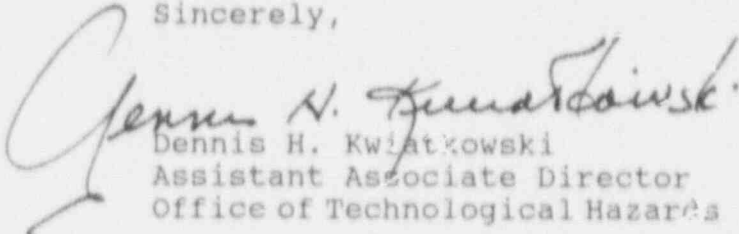
The April 15, 1991, letter and attachment included a flow chart which indicates that the FEMA REP-10 Addendum or Addenda with the new design will be submitted as the last step in the transition process. We understand that a town-by-town siren installation approach may facilitate and be the most feasible way to physically transition to a new system; however, an incremental approach to reviewing the system changes as they are completed and implemented will make the FEMA review of the new design more difficult and will likely increase the time required to complete and approve the entire review process. Ideally we would like to be able to review an overall proposed FEMA REP-10 Design Addendum, consisting of the proposed, new, integrated system design (physical means) in its totality as early in the transition process as possible. Otherwise, FEMA may be in the position of issuing several findings as the system is transitioned from the VANS to the pole-mounted sirens.

We believe it is important to emphasize that a significant portion of an operating alert and notification system, approved by FEMA, is being replaced with a totally new system. As such, the transition from the VANS to the fixed, pole-mounted siren alert and notification system should ensure the following:

- o At a minimum, the same alert and notification system coverage and capabilities currently provided by the VANS and approved by FEMA should continue to be provided by the new fixed, pole-mounted siren system; and
- o There should be an integrated transition from the VANS to the fixed pole-mounted siren system including a three-month overlap period during which the new fixed siren system is tested and its operability confirmed before the VANS are removed from service. There should be no lapse in alert and notification system coverage at any point. Consideration should be given to implementing the system transition during a scheduled outage at Seabrook Station. This would further minimize any potential public health and safety threats if there were to be any alert and notification system problems during the transition phase.

We are prepared to assist the Commonwealth of Massachusetts and NHY in this very important undertaking with any possible technical assistance. We look forward to coordinating closely with them during the transition and review process. If you have any questions please call me at (202)-646-2871.

Sincerely,


Dennis H. Kwiatkowski
Assistant Associate Director
Office of Technological Hazards