

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of	}	
KANSAS GAS and ELECTRIC CO., et al	}	Docket No. STN 50-482
(Wolf Creek Generating Station, Unit 1)	}	

TESTIMONY OF MARY MARLEE CARROLL AND RICHARD J. LEONARD,
FEDERAL EMERGENCY MANAGEMENT AGENCY
(Contentions 1-10, 12-16, 17 b., 17c., and 18-32)

I, Mary Marlee Carroll, Senior Technological Hazards Specialist, and I, Richard J. Leonard, Community Planner, both are employed by the Technological Hazard Branch, Natural & Technological Hazards Division, Federal Emergency Management Agency (FEMA), Region VII, Kansas City, Missouri. Statements of Professional Qualifications are attached to our testimony. In our respective positions we are responsible for providing assistance to State and local governments in the preparation of Radiological Emergency Response Plans (RERPs), reviewing those RERPs to assure compliance with NUREG-0654, FEMA REP 1, Revision 1 (1980) (hereinafter referred to as "NUREG-0654"), and 44 C.F.R. Part 350, 48 Fed. Reg. 44332 (September 28, 1983).

This testimony is provided at the request of the Nuclear Regulatory Commission (NRC) Staff pursuant to the Memorandum of Understanding (MOU) between FEMA and the NRC, as revised on November 11, 1980, 45 Fed. Reg. 82715, and incorporated in FEMA regulations at 44 C.F.R. 350.3 (f) which states:

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Notwithstanding the procedures set forth in these rules [44 C.F.R. Part 350] for requesting and reaching a FEMA administrative approval of State and local plans, findings and determinations on the current status of emergency preparedness around particular sites may be requested by the NRC and provided by FEMA for use as needed in the NRC licensing process. These findings and determinations may be based upon plans currently available to FEMA or furnished to FEMA by the NRC through the NRC/FEMA Steering Committee (emphasis added).

FEMA's testimony is base upon a review of the following documents:

1. State of Kansas, Annex A to Assistance R, Nuclear Emergencies of the State Disaster Emergency Plan (September, 1983) (hereinafter referred to as the "State Plan")
2. Coffey County Contingency Plan for Incidents Involving Nuclear Power (Revised September, 1983) (hereinafter referred to as the "County Plan").
3. Coffey County Emergency Preparedness Office Contingency Plan Implementing Procedures, Numbers 1 to 31 (September, 1983) (hereinafter referred to as "CPIP No. __").

This testimony incorporates comments from the Regional Assistance Committee (RAC), an interagency committee chaired by FEMA with members from seven Federal agencies including the NRC, and an in depth review of by the Technological Hazards Branch of FEMA Region VII against the criteria of NUREG-0654 and 44 C.F.R. Part 350.

Our testimony with regard to Contentions 1-10, 12-16, 17b, 17c, and 18-32 follows.

Contention 1.(a)

The format and content of the notification message by KG&E has not been determined by the Sheriff, Emergency Preparedness Coordinator, and KG&E. The evacuation time will, therefore, be longer than estimated.

Response

NUREG-0654, element E.3., states that the licensee, in conjunction with the State and local organizations, shall establish the contents of the initial emergency message from the plant. The message shall contain information about class of emergency, whether a release is taking place, potentially affected population areas, and whether protective measures are necessary.

All this information has been included in the notification forms to be used, as included in State plan, page E-13, and the County CPIP Nos. 1, 2, and 3, Attachments 1-1, 2-1, and 3-1, respectively.

Contention 1.(c)

The County Plan does not specify what the Sheriff is to do if he is not able to make the notifications listed in Table 3-1.

Response

CPIP Nos. 1, 2, and 3, attachments 1-2, 2-2, and 3-2, respectively, provide for Sheriff's dispatcher notification call lists which provide primary and alternate contacts. However, the listings for these contacts were not complete in the copies provided for review. Each CPIP, secs. 3.1.3 to 3.1.7, provide procedure for use of these lists, including primary and alternate contact. A primary and alternate contact are sufficient to meet planning requirements.

Contention 1.(d)

The County Plan is deficient because it does not specify how the County Sheriff will contact the schools in the 10-mile EPZ if there is an emergency. Telephones may not be sufficient because they could be busy because of the accident. The evacuation time will, therefore, be longer than estimated.

Response

NUREG-0654, element F.1., states that each organization should establish reliable primary and backup means of communication.

The County CPIP No. 3, sec. 3.3.1.3, indicates that the Sheriff's Dispatcher telephones the schools as part of the Immediate Notification Call List, Attachment 3-2.

The County Plan, sec. 3.3.1, indicates that tone alert radios are provided to each school superintendent and principal. This would provide notification in the absence of telephone contact by the Sheriff's office. Figure 4-2, p. 4-5, of the Plan indicates proposed radio communication between the Sheriff's office and school superintendents. This would provide a third means of notification for the schools.

Contention 1.(e)

The County Plan does not make adequate provision for how the Sheriff will notify the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the Kansas Fish and Game Commission, when the warning function is activated. The evacuation time will, therefore, be longer than estimated.

Response

NUREG-0654, element F.1., states that each organization should establish reliable primary and backup means of communication.

The County Plan, Figure 4-2, p. 4-5, indicates that the Sheriff's Office can notify these agencies by telephone and radio. The County Plan, sec. 3.2, p. 3-4, indicates these agencies are supplied with commercial-grade tone alert radios. This is adequate reliable primary and backup communication.

Contention 1.(f)

It is not specified in detail what the Emergency Preparedness Coordinator is to tell the persons he notifies under Table 3-1. There is no provision about what is to be done if the people cannot be contacted or are not available.

Response

The County CPIP Nos. 12, and 13, indicate in secs. 12.3.6., and 13.3.5., respectively, that the Emergency Preparedness Director is to read the information and instructions specified in attachments 12-1, and 13-1, respectively, in making the notifications. Sec. 13.3.7., provides additional instructions to be given. Attachments 12-2 and 13-2 provide primary and alternative contacts. However, the listings for these contacts were not complete in the copies provided for review. FEMA will review these lists to ensure that they are complete.

Contention 1.(g)

The provision to notify the hospitals and nursing homes is not adequate because the Emergency Preparedness Coordinator will be too busy with other duties to do this, and telephone communications will be difficult because the lines will be busy. No other means of communications is provided for.

Response

The Coffey County Hospital Administrator will be notified under an Alert Classification by the Emergency Preparedness Coordinator, to serve as Health and Medical Management Team Leader. Thereafter, the Health and Medical Management Team Leader contacts the Coffey County Hospital and Golden Ages Nursing Home under a Site Area or General Emergency Classification, as specified in CPIP No. 21, sec. 21.3.4. The Team operates from the Coffey County Hospital, sec. 21.3.3, so notification of the Hospital will be readily provided. Alternatives to telephone notification of the nursing home are not presented in the Plan nor CPIPs. The capacity of the telephone system is uncertain. But the notification of the Health and Medical Management Team, and the hospital and nursing home, may take place early in the Site Area Emergency Classification. At that time, the telephone system may not be too busy.

Contention 1.(i)

The County Plan does not specify who the Fire Leader is to notify if a fire chief is not available.

Response

The Plan does not specify who the Fire Leader is to notify if a fire chief is not available. But, the Plan may be recognizing alternates to the fire chiefs, which may exist as standard emergency procedures within the communities. Their inclusion in the Plan would, therefore, be unnecessary.

Contention 1.(j)

It is not specified what the fire chiefs of the various cities are to do when they are notified by the Fire Leader.

Response

The County CPIP No. 19, secs. 19.3.5 and 19.3.6, indicates that the Fire Leader will be directing the fire chiefs to notify persons who are unable to hear sirens or tone alert radios, and to dispatch pumper trucks to access control points for decontamination of emergency workers and vehicles.

Contention 1.(k)

The County Plan does not provide who will be responsible for the 24-hour per day manning of the communications links that the Sheriff is responsible for.

Response

The County Plan, sec. 1.2.2.(3), states that the Sheriff is responsible for 24 hour per day manning of the communication links between Coffey County and Wolf Creek Generating Station and between Coffey County and the State.

The County Plan, sec. 3.1, p. 3-1, and sec. 3.2., p. 3-3, indicates that the Sheriff's dispatcher mans the communication system 24-hours per day.

Contention 1.(1)

The County Plan does not consider what happens if communications equipment is not available to the Sheriff to provide communications between Coffey County and Wolf Creek, and between Coffey County and the State. There is not adequate backup equipment.

Response

NUREG-0654, element F.1., states that each organization shall establish reliable primary and backup means of communication. The County Plan, Figure 4-2, p. 4-5, and the State Plan, Figure F-2, p. F-19, differ in their indication of communications capability between Coffey County and the State EOC. But, a telephone contact with the Kansas Division of Emergency Preparedness has indicated that the State Plan is accurate in depicting radio and teletype capability as backup to telephone communication between Coffey County and the State EOC. The radio communication would be via the Sheriff's radio, with relay through the State Highway Patrol in Chanute. The teletype capability, via land-line, affords another reliable means of communication, separate from the telephone system.

Both the County Plan, Figure 4-2, p. 4-5, and the State Plan, Figure F-2, p. F-19, indicate both telephone and radio capability between Coffey County and the Wolf Creek Emergency Operations Facility.

Thus, adequate primary and backup communications are provided.

Contention 2.(b)

Ten or twelve additional people will be required to handle telephone calls at the Coffey County Emergency Operations Center. None of these people are available.

Response

The County Plan, sec. 3.1, p. 3-1, indicates that if the classification of the event is a Site Area Emergency or General Emergency, then the entire Emergency Response Organization is activated and all individuals, except the Health and Management Team and the Public Information Officer, assemble at the EOC. Sec. 1.1, p. 1-1, indicates that key positions of the Emergency Response Organization would include the Board of Coffey County Commissioners, County Sheriff, Emergency Preparedness Coordinator, County Engineer, County Attorney, Radiological Defense Officer, Shelter Systems Officer, and Fire Leader. Auxiliary staff is not documented.

The County Plan and CPIPs indicate functions to be performed by each of these positions. A review of these positions and functions does not, in itself, warrant a finding of the need for additional staff to perform the assigned functions. A definite assessment of resources needed to implement the Plan is dependent upon an exercise of the Plan.

Contention 2.(c)

The telephone system will not be adequate. There will not be enough lines in the event of an emergency.

Response

The County Plan, sec. 4.2, p. 4-1, indicates that there are 10 telephone lines to the EOC, and four to the Sheriff's Office. The ten telephones in the EOC exceed the eight Emergency Response Organization positions to be located in the EOC (see the Response to contention 2.(b)). In consideration of this, a finding of inadequacy of the telephone system is not warranted, at this time.

Contention 3.(a)

The Sheriff needs radio equipment that will permit him to talk to the Wolf Creek Plant and all of Coffey County.

Response

The County Plan, sec. 4.2.3, p. 4-2, indicates that the County Sheriff's Office radio system has the ability to communicate directly with the Wolf Creek Generating Station and the entire County.

Contention 4.(a)

There is not an adequate source of emergency power at the Coffey County Emergency Operations Center. The emergency generator located in the County EOC has not operated properly. There is no assurance that it will operate properly in the event of an emergency.

Response

NUREG-0654 does not specify that emergency power be provided at emergency operations facilities. FEMA CPG 1-5 does require back-up emergency power for an EOC. The County Plan, sec. 4.1, p. 4-1, indicates that the County EOC is equipped with an emergency generator. The capability of this generator is not documented in the Plan. An assessment of the adequacy of emergency power is the EOC cannot, therefore, be made. In order to assure proper operations, FEMA recommends that emergency generator be tested in accordance with the manufacturer's recommendations. These typically include a weekly 30-minute test, and a monthly 30-minute test under load.

Contention 5.(a)

Due to insufficient staffing, Coffey County cannot provide security for the Coffey County Courthouse in the event of an emergency. Although six persons are needed to fill this position, none are presently available.

Response

NUREG-0654 does not require security measures for EOC's. However, during an exercise, the EOC staff are evaluated as to their ability to control access to the EOC. The County Plan, sec. 1.2.2, p. 1-4, does give the County Sheriff the responsibility for access control. County CPIP No. 9, sec. 9.3.4, provides procedures for establishing access to the Courthouse and EOC, involving two of the Sheriff's staff members, one at the main entrance of the Courthouse and the other at the entrance of the EOC. An account of personnel available to occupy these positions has not been provided for review. An assessment of adequacy cannot, therefore, be made from the information provided for review.

Contention 5.(b)

The Sheriff has not assigned any person to be responsible to control access to the County Courthouse and County EOC during an emergency.

Response

NUREG-0654 does not require security measures for EOC's. The County Plan, sec. 1.2.2, p. 1-4, does give the County Sheriff the responsibility for access control. County CPIP No. 9, sec. 9.3.4., provides procedures for establishing access to the Courthouse and EOC, involving two staff members. An account of personnel available to occupy these positions has not been provided for review.

Contention 6.(b)

The County Plan is deficient because it does not clearly define who will decide which of the protective actions in Section 3.0 will be initiated. It is too vague to say that the "Emergency Response Organization will decide." The evacuation time will be longer than estimated, for

Response

The County Plan, sec. 3.1, p. 3-2, states that the timing of a given emergency event and the availability of responsible officials determines which official makes protective action decisions. The County Sheriff is responsible for protective action decisions in the initial period of county response. The decisions are made by the Chairman of the County Commissioners, instead of the Sheriff, after the Chairman has notified the Sheriff that he is assuming his responsibilities, and after the Chairman has declared a State of Local Disaster Emergency. This procedure is also indicated in the CPIP's for the Sheriff and Chairman for the Site Area and General Emergency.

The County Plan, sec. 3.1, p. 3-2, further indicates that "when the Governor has declared a State of Disaster Emergency and when the Administrator, Radiological Systems, Kansas Division of Emergency Preparedness has arrived at KG&E's Emergency Operations Facility and provided notice to the responsible County Official that the State is assuming command of those emergency response functions that the County requests, the State then assumes its statutory responsibilities." It is indicated that once the Governor makes this

Contention 6.(b) Cont'd

declaration, the Governor may issue orders and directions which have the force of law, and which are administered by the Adjutant General (possibly through the Division of Emergency Preparedness). This section of the County Plan further indicates that in the absence of specific instructions from the Adjutant General, the Emergency Response Organization is responsible for initiating the actions. The County CPIP No. 7, for the Chairman of the County Commissioners, for a General Emergency, sec. 7.3.5, indicates that if a State of Disaster Emergency has been declared (by the Governor), the Chairman coordinates his emergency response efforts with the Radiological Systems Administrator (of the Kansas Division of Emergency Preparedness).

The County Plan, therefore, clearly defines the transfer of decision-making authority from the Sheriff to the Chairman, upon a declaration of a State of Local Disaster Emergency. But, upon a declaration of a State of Disaster Emergency by the Governor, it is uncertain from the County Plan and CPIP's as to the degree to which the County Chairman may continue to make protective action decisions. It appears that either the Chairman or the Governor may make protective action decisions under a State of Disaster Emergency, depending upon the situation, and the resulting degree to which the County is able to receive guidance from the State.

Contention 6.(c)

The County Plan is deficient because Table 1-1 and other parts of the plan do not make it clear whether the Sheriff or the County Commissioners are responsible for making a decision about evacuation.

Response

See response to Contention 6.(b). Additionally, Table 1-1 indicates under what circumstances the Commissioners or the Sheriff are responsible for decision-making.

Contention 6.(d)

The State Plan says that the Governor can order an evacuation. On the other hand, the Coffey County Plan says that Coffey County will decide about an evacuation. The plans must be consistent in regard to this responsibility.

Response

The State Plan, Table J, sec. 1.1.2, p. J-3, states that after a State of Disaster Emergency has been declared, the decision to evacuate will be made by the Governor where time permits. On page J-2, it is indicated that if time and circumstances do not permit, the County Sheriff or County Commissioners, after a declaration of a State of Local Disaster Emergency, will make the decision to evacuate. This is consistent with what the County Plan says, as discussed in the response to Contention 6.(b).

Contention 6.(e)

According to Figure B-2 of the State Plan, the decision about evacuation is the responsibility of the Division of Emergency Preparedness. This conflicts with other parts of the State Plan which indicate the Governor will make the decision, and it conflicts with the Coffey County Plan.

Response

Figure B-2 of the State Plan indicates that the Governor has primary responsibility for an evacuation decision, after a declaration of a State of Disaster Emergency. The State Plan, Table J, sec. 1.1.2, p. J-3, indicates that after a State of Disaster Emergency has been declared, the decision to evacuate will be made by the Governor where time permits. This is consistent with the Coffey County Plan, as discussed in the response to Contention 6.(d). The Kansas Division of Emergency Preparedness is responsible for making recommendations to the Governor upon which his decision will be based.

Contention 6.(f)

The County Plan is deficient because it places the County Clerk above the Emergency Preparedness Coordinator in the chain of command and line of succession.

Response

The County line of succession to the chairman of the County Commissioners is indicated in the County Plan, sec. 1.3, p. 1-12. The line of succession is a decision by the County for which no deficiency is evident.

Contention 6.(g)

Due to insufficient staffing, Coffey County cannot adequately direct the evacuation. Although two personnel are required to perform this function, only the Sheriff is presently available.

Response

The County Plan, sec. 1.2.5, p. 1-7, indicates that the County Engineer has emergency responsibilities which relate to directing evacuation transportation for individuals without automobiles, access control, information on the condition of evacuation routes, and evacuation confirmation. All of these would support the Sheriff in his directing the evacuation. In consideration of this, a finding of insufficient staff to direct the evacuation is not warranted, at this time.

Contention 6.(h)

There are no details in the County Plan about what protective actions the Emergency Preparedness Coordinator will assist the Sheriff with.

Response

The County Plan, sec. 1.2.3(12), p. 1-5, states that the Emergency Preparedness Coordinator will assist the Sheriff in initiating protective actions based upon recommendations and guidance provided by the Kansas Department of Health and Environment and/or the Duty Emergency Director at Wolf Creek Generating Station.

The County Plan, Table 1-1, p. 1-16, indicates that the Emergency Preparedness Director offers support for an evacuation/shelter decision to the County Commissioners, or, if they are not available, to the County Sheriff.

In the event of a Site Area or General Emergency, County CPIP No. 13 details the responsibilities of the Emergency Preparedness Coordinator, including those aspects of protective actions he will initiate.

Contention 6.(n)

The County Engineer has more responsibilities than he will be able to handle.

Response

The County Engineer's responsibilities are indicated in the County Plan, sec. 1.2.5, p. 1-7 & 1-8. The responsibilities, in themselves, are not evidently more than the County Engineer will be able to handle. Support personnel will apparently be needed to implement the County Engineer's responsibilities. Documentation of available support personnel has not been provided for review. An assessment of the County Engineer's responsibilities cannot, therefore, be made with the information provided for review.

Contention 6.(o)

The County Plan does not make allowance for the fact that the Engineer and the Shop Foreman may both be unavailable at the same time.

Response

The designation of a primary and an alternate person for a position is considered adequate for planning purposes.

Contention 6.(p)

The County Plan does not make provision for the absence of both the Sheriff and the Under Sheriff.

Response

The designation of a primary and an alternate person for a position is considered adequate for planning purposes.

Contention 6.(q)

The County Plan does not provide who will take over the Emergency Preparedness Coordinator's responsibilities if he is not available or needs to be relieved.

Response

The County Plan, sec. 1.2.3, p. 1-6, states that in the absence or incapacity of the Emergency Preparedness Coordinator, his responsibilities become those of the Radiological Defense Officer. The Radiological Defense Officer's alternate would take over those responsibilities, County Plan 1.2.10, p. 1-11.

Contention 6.(r)

The County Plan does not make allowance for the absence of the County Clerk or who will assume his duties when he is relieved.

Response

The County Plan, sec. 1.2.4, p. 1-7, states that in the absence of the Public Information Officer (County Clerk), his responsibilities become those of the Public Information Officer's alternate.

Contention 7.(a)

NUREG-0654 indicates that plans should contemplate that releases after an accident occurs at the site can begin within one-half hour and spread to over five miles in 0.5 - 2 hours and to 10 miles in 1 - 4 hours: the evacuation times indicate that many people will not be evacuated within those time limits. Therefore, they can receive serious radiation exposure and injuries. The County Plan does not adequately consider how this kind of situation will be handled and the consequences of it.

Response

NUREG-0654, element J.9, states that each State and local organization shall establish a capability to implement protective measures based on protective action guides and other criteria consistent with the recommendation of the EPA, and, element J.10.m, that the basis for the choice of recommended protective actions shall include protection afforded by sheltering, as well as evacuation.

The County CIPs No. 7, secs. 7.3.6, 7.3.9, and 7.3.11, and No. 10, secs. 10.3.4 and 10.3.5, indicate that the County protective action decisions are based on technical information and recommendations from the WCGS and the Kansas Division of Emergency Preparedness. The recommendation would consider the protective action guides and evacuation times as required by NUREG-0654. The consideration would include a comparison of evacuation time and the time of

Contention 7.(a) Cont'd

plume exposure. A decision as to what protective action to take would be made based upon all of this information. Thus, the County Plan does consider how this situation will be addressed.

Contention 7.(c)

Table 1-1 of the County Plan provides that there will be personnel evacuation, but there is no detail about this in the plan itself. There should be criteria specified so that the person responsible for making this decision will know when and how to do it.

Response

The County Plan, Table 1-1, p. 1-16, provides for evacuation/shelter decision, and evacuation. These are then discussed in the Plan, sec. 3.3, p. 3-4. The CIPs for the various officials responsible for these actions provide for when and how to implement these actions. These include CIPs No. 7 for the Chairman of the County Commissioners, sec. 7.3.6, 7.3.9, and 7.3.11, and No. 10 for the County Sheriff, secs. 10.3.4 and 10.3.5.

Contention 7.(d)

The County Plan is deficient because it does not contemplate how to evacuate after there has been a period of shelter.

Response

The response to Contention 7.(a) indicates the provisions for considerations of protective actions. These would accommodate sheltering recommendations prior to evacuation. No deficiency in implementing evacuation after sheltering is evident in the Plan, nor CPIPs.

Contention 8.(a)

The County Plan is deficient because it does not provide evacuation time estimates for a winter night evacuation under average or adverse weather, and it does not provide for a summer night evacuation under adverse weather conditions.

Response

NUREG-0654, Appendix 4, sec. IV.A., p. 4-6, states that two conditions - normal and adverse - shall be considered in the evacuation time analysis. The adverse weather frequency used in the analysis shall be identified and shall be severe enough to define the sensitivity of the analysis to the selected events. More than one adverse condition may need to be considered.

The County Plan, Appendix K, Table K-7, p. K-19, provides the summary evacuation times for average and adverse weather conditions. The accompanying text does not, however, define adverse weather conditions. It does not, therefore, provide an indication of the range of adverse weather to which the evacuation time applies. It is uncertain, therefore, whether more than one adverse condition needs to be considered. A definition of the assumed adverse condition needs to be provided, along with a comparison of the assumed condition to other adverse conditions.

Contention 8.(b)

Evacuation times for an evacuation on a winter and under adverse weather conditions are virtually identical. This is not realistic and therefore the plans are deficient.

Response

See response to Contention 8.(a).

Contention 8.(c)

The County Plan does not provide an estimated evacuation time for individuals who do not have their own private automobiles for transportation. There is no estimate of evacuation time for them.

Response

NUREG-0654, Appendix 4, sec. II.A., p. 4-2 & 4-3, states that permanent residents shall be divided into two groups: 1) those using autos and 2) those without autos. Special attention must be given to those households not having automobiles.

The County Plan does not provide an estimated evacuation time for residents without automobiles. Nor does it indicate, as specified in NUREG-0654, how these residents were considered. Consideration of the residents without automobiles should be provided for in the evacuation time analysis.

Contention 9.(a)

The County Plan is not precise about which evacuation routes that people in various subzones will follow.

Response

The evacuation routes are well described, per subzone, in the County Plan, Table 3-4, p. 3-27. Appendix L, pp. L-23 to L-31 contain the route descriptions which will be read over the EBS in the event of an evacuation. These are also well described. The routes are also depicted in Figure 3-2, p. 3-16.

Contention 9.(c)

The County Plan is deficient because the evacuation routes send the evacuees downwind and create greater risk to them in many instances. The plan needs to give adequate consideration to wind directions and possible changes in wind direction during an evacuation.

Response

The County Plan, Figure 3-2, p. 3-16, depicts the evacuation routes on a map of the County. Alternate evacuation routes could be readily chosen from this figure if the primary route was in a direction in which the evacuees would be exposed to greater risk.

Contention 9.(e)

The County Plan does not provide for alternate evacuation routes that will be necessary if there is heavy snow, rain, flooding, or fog.

Response

The County Plan, Figure 3-2, p. 3-16, depicts the evacuation routes, with numerical identification, on a map of the County. An alternate evacuation route could be readily chosen by referencing this figure. A description of the numbered evacuation routes is given in Figure 3-2, p. 3-17, with a further description in Table 3-4, p. 3-27.

Where weather is inclement or road conditions are questionable County CPIP No. 17, sec. 17.3.6 charges the County Engineer with the responsibility to send out personnel to determine the condition of the major evacuation routes. The County Engineer reports this information to the decision-makers who will use it to determine the merits of changing the routes or taking other protective action, County CPIP No. 17, secs. 17.3.6 to 17.3.9.

Contention 10.(a)

The County Plan does not indicate in detail how the County Engineer will get information about road conditions.

Response

The County CPIP No. 17, secs. 17.3.6 and 17.3.7, indicates that the County Engineer would dispatch crews to determine the condition of the evacuation routes. The County Plan, sec. 4.2.2, p. 4-1, indicates that the County EOC has radio capability with all county vehicles so that this information can be relayed from the field to the County Engineer.

Contention 10.(b)

Due to insufficient staffing, Coffey County cannot clear and sand evacuation routes in the event of snow and adverse weather in a reasonable amount of time. In order to clear the roads of snow, a total of fifty to seventy-five people would be required, to do the job in a reasonable amount of time. There are only 22 people on the County Road and Bridge Crew who can perform this task.

Response

Neither the County Plan nor the County CPIP's document the personnel nor equipment available for clearing evacuation routes. An assessment of adequacy cannot, therefore, be made from the material submitted for review. As stated in response to Contentions 9(e) and 10(a) County CPIP No. 17 details the procedure to identify the condition of the evacuation routes. Sec. 17.3.8 indicates that if it is not feasible to clear the preferred evacuation routes within the time interval specified by the Sheriff or Chairman of the County Commissioners, the County Engineer will advise them so that they can consider the merits of sheltering.

Contention 10.(c)

Coffey County does not have enough snow plows, desalting trucks, and other snow removal equipment to clear the roads for an evacuation in a reasonable amount of time.

Response

See response to Contention 10.(b).

Contention 10.(d)

The County Plan does not specify the priority for the cleaning of evacuation routes.

Response

The priority for clearing of evacuation routes would involve a decision making process similar to that for nonemergency route clearing. This degree of detail is not, therefore, necessary in the County Plan. However, the process is outlined in County CPIP No. 17, secs. 17.3.6 to 17.3.9, which provides that based upon the information provided to him by the crews sent out to determine road conditions the County Engineer will dispatch road clearing equipment and personnel to clear preferred evacuation routes.

Contention 12.(b)

The County Plan indicates that the Public Information Officer will engage in "several activities" to assure that emergency planning educational information is easily accessible to the general public. This is too vague and the activities should be specified in detail.

Response

The County Plan, sec. 5.4, p. 5-3, states that the Public Information Officer (PIO) engages in several activities to assure that emergency planning information is easily accessible to the general public. The section indicates that this information is distributed by an annual mailing of the Emergency Planning Brochure and questionnaire, in telephone books, at public meetings, and by billboards at John Redmond Reservoir. It appears that the PIO is responsible for taking part in these activities.

County CPIP No. 31 details the activities of the PIO in developing the public information materials in coordination with the Kansas Division of Emergency Preparedness and Kansas Gas and Electric Company.

Contention 12.(c)

The County Clerk has not been adequately involved in the preparation of the emergency planning educational information to be distributed to the public.

Response

The degree to which the County Clerk, who is designated as the Public Information Officer, has been involved in the preparation of the emergency planning educational information cannot be ascertained from the County Plan, nor the CPIPs. What is required is that the responsibility for preparation and dissemination of the public information material is delegated under the plan. As stated in response to Contention 12.(b), this has been done.

Contention 12.(d)

The public information and emergency planning education materials should be set forth in the County Plan.

Response

Copies of the Emergency Planning Brochure should be available with the plan, but they do not need to be part of the plan. NUREG-0654, Element G.1., only requires the plan to address how the required information is to be developed and distributed. The Coffey County Plan addresses this requirement.

Contention 12.(e)

There is no detail about how education information will be provided to transients.

Response

The County Plan, sec. 5.4, p. 5-4, indicates that the information is in telephone books, on "large public information billboards" and in brochures provided at John Redmond Reservoir, and in brochures provided to motels. The Letter of Agreement with Kansas Fish & Game provides that they will display or distribute to visitors, in that portion of the John Redmond Reservoir under its jurisdiction, the public information provided by Coffey County.

Contention 12.(f)

The County Plan is deficient because it does not provide how the public will be kept advised of plan changes that will affect them at the time of an evacuation.

Response

The public receives educational information through various means as discussed in the response to Contention 12.(b). NUREG-0654, Element G.2, requires that the information be updated and disseminated at least annually. The County Plan, sec. 5.4, p. 5-4, states that an Emergency Planning Brochure will be mailed to residents of Coffey County annually.

Contention 12.(g)

The County Plan should provide methods by which it can be determined if the public is aware of the public information and emergency planning education materials and if they understand how they are to respond in the event of an emergency.

Response

NUREG-0654, Appendix 3, p. 3-3, states that every year, FEMA, in conjunction with an exercise of the facility, and in cooperation with the utility and/or State and local governments, will take a statistical sample of the residents of all areas within about ten miles of the facility, to assess the public's ability to hear the alerting signal, and their awareness of the meaning of the prompt notification message as well as the availability of information on what to do in an emergency. As assessment of public awareness is, therefore, the responsibility of FEMA. Standards to carry out this responsibility have recently been published in the "Standard Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants", FEMA-43 (September 1983).

Contention 12.(1)

The County Clerk has not determined how new bulletins will be forwarded to public shelters and to other agencies that are to receive such bulletins.

Response

The County CPIP No. 15 for the Public Information Officer (County Clerk), sec. 15.3.9, indicates that the news releases are issued in coordination with the KG&E and State PIO's. They are forwarded to the public registration centers and shelters via a telephone call to the Reception and Care Coordinators, or from County Sheriff to County Sheriff by radio or ASTRA. The County PIO may also dispatch someone to deliver the bulletins. This accounts for all the agencies that are to receive the bulletins, according to the County Plan, sec. 1.2.4.7, p. 1-6.

Contention 12.(n)

The County Plan is deficient because, to the extent that it relies on the Emergency Broadcasting Service [sic], it will not provide information to individuals who do not have access to television or radio.

Response

The County Plan, sec. 5.4, p. 5-4, indicates that the annual mailing of the Emergency Planning brochure contains a questionnaire to update the list of persons requiring special evacuation or notification assistance. The Plan, sec. 1.2.3, p. 1-5, indicates that the Emergency Preparedness Coordinator maintains the list. The Plan, sec. 1.2.5, p. 1-7, indicates that the County Engineer directs personnel to provide special notification to these individuals. Therefore, the Plan specifically addresses notification of special residents.

Contention 12.(o)

There is no indication that radio station WREN in Topeka has the details of the County Plan and will know how to respond if it receives an emergency message from the Public Information Officer.

Response

There is no need for the EBS station to have a copy of the County Plan. It would be expected, as an EBS station, to be able to activate the EBS system, and broadcast a message transmitted from the Public Information Officer.

Contention 12.(p)

The County Plan is deficient because it does not indicate who will decide which of the messages listed in Table 3-2 will be used.

Response

The County CPIP No. 15 for the Public Information Officer, includes, as attachments, the messages listed in Table 3-2, sec. 15.3.4, of the CPIP indicates that the PIO prepares the appropriate message at the request of the Sheriff or Chairman of the County Commissioners. It is the PIO who decides which message to use at the direction of the Sheriff or County Commissioner.

Contention 12.(r)

In the message at Table 3-2, Sheet of 12 of 15, the details about the evacuation routes and sectors will be too long and confusing. People will therefore, not follow the instructions.

Response

The descriptions of the evacuation subzones and routes are given in the County Plan, Table 3-4, p. 3-27. The description of Subzone A0 refers to a specified distance (2 miles) from WCGS. The other descriptions refer to townships and roads which should be familiar to the public, and, therefore, not confusing. The descriptions are concise, to the extent that desirable selectivity and specificity would allow.

Contention 12.(s)

The County Plan is deficient because in Section 3.3.1 the Public Information Officer will advise the parents where children have been evacuated to. This information should have been supplied to the parents at an earlier time. The plan does not make provision for providing such information.

Response

The County Plan, sec. 5.4, p. 5-3, provides for various means by which emergency preparedness information is disseminated to the public in advance of an emergency. Information regarding to where the schools will be evacuated should be included in this material.

Contention 12.(t)

One telephone number where the public can inquire for information will not be adequate. The County Plan needs to specify how many numbers and lines will be needed. These numbers should be listed for public use.

Response

The County Plan makes no specific provision for a telephone number by which the public can call in for information. Necessary public information would be disseminated to the public via EBS and news releases.

Contention 13.(a)

There is no provision for the evacuation of pregnant women and small children even if shelter is considered for others.

Response

The County CPIP No. 15, Attachment 15-7, provides an EBS announcement of evacuation of pregnant women and preschoolers. This could be issued coincidentally with an announcement on sheltering for the general public. No other provision is made in the Plan nor CIPs for the evacuation of pregnant women and children, specifically. But it is unclear what if any, special provisions they may need, beyond than the evacuation instruction, the registration and sheltering that would be provided to the general public.

Contention 13.(b)

The County Plan does not provide transportation for the evacuation of pregnant women and small children if they are evacuated before others. If buses or other means of transportation are used for them, then that transportation might not be available to other when there would be a full evacuation.

Response

The County Plan does not make specific provision for transportation of pregnant women and preschoolers. They may seek transportation assistance from the County provided for the general public, as indicated in the Plan, Section 3.5, p. 3-8, and Section 1.2.5.8, p. 1-7, as directed by the County Engineer. Provision should be made for the concurrent evacuation of all members of families with pregnant women and preschoolers, who may depend on the transportation to be used by these women and children.

Contention 14.(a)

The teachers, school administrators, and children have not been trained about how to handle the evacuation, and there are no plans in the County Plan to specify how they will be instructed to deal with an emergency evacuation.

Response

NUREG-0654, element 0.1, states that "Each organization shall assure the training of appropriate individuals." Whether an individual is "appropriate" to receive training is dependent upon the function the individual assumes under the Plan.

The County Plan, sec. 3.3.1, p.3-6, does not identify the role the teachers will play in an evacuation, only roles of the superintendents and the principals. Training has been identified for these individuals, County Plan, CPIP No. 28, p.3, and Table 5-1, p.5-5, but the plan distribution list, County Plan, p. viii, does not include them as recipients of the plan. There is no evidence in the County Plan that these individuals are aware of their roles.

Since schools may have to be evacuated or used as shelters in the event of a shelter advisory, per County Plan, sec. 3.3.1, p.3-6, it is reasonable to require training be conducted for teachers, school administrators and children, just as it is for tornado or flood preparedness.

Contention 14.(b)

There are not enough school buses available to evacuate school children.

Response

NUREG-0654, element J.10.g., requires that the plan implement protective measures for the plume exposure pathway include means of relocation.

The County Plan, Table K-3, p. K-12, states that the school enrollment in Burlington and Le Roy, the two area where schools will be evacuated is 520 and 227 respectively. There are 11 buses in Burlington and five buses in Le Roy that are available. Their respective capacities are indicated in the same Table. This is ample capacity to serve the needs of these two schools.

There is one area of concern, however, and this is for the six private schools in the area. The County Plan, Appendix K, sec. 2.0, p. K-7, assumes "that the children would be picked up by their parents prior to evacuation from the effective 10-mile EPZ." The Plan should not "assume" that these parents are available to transport their children. It is not acceptable that parents be depended upon to pick up private school children.

The numbers of these children have not been identified. Therefore, it cannot be determined with the information available in the plan if the excess public school bus capacity plus the church bus capacity would be sufficient to accommodate the additional student population with one evacuation trip. If

Contention 14.(b) Cont'd

buses could be used from school districts not scheduled to be evacuated, this problem could be eliminated. If this were to be done, letters of agreement would have to be obtained from these school districts or private bus companies.

Contention 14.(c)

The County Plan does not make provision for buses not being available at the time of evacuation.

Response

This response relates to the same NUREG-0654 element, J.10.g., as contention 14.(b).

The contention does not state the reasons why the buses are not available for evacuation use. During school hours, buses may be refueled, cleaned, etc., but remain available for use. Any mode of public transportation, such as buses, has standard operating procedures for picking up the void necessitated by a disabled vehicle. In this instance, there is surplus seating capacity which could absorb a vehicle failure, beyond that, SOPs for return pick-ups may be required.

Alternate methods are not stipulated in the County Plan, but ample seating capacity for school evacuation is recognized, Table K-3, p. K-12, with the reservations as stated in Contention 14.(b) for private school children evacuation.

Contention 14.(d)

The County Engineer does not have the means to provide transportation assistance to school districts who will need additional transportation in the event of an evacuation.

Response

NUREG-0654, element J.10.g, requires that the plan's protective measures for the plume exposure pathway include means of relocation.

As indicated in response to Contention 14.(b), there are adequate buses to evacuate the Burlington and LeRoy Schools. However, until the private school population is identified, the need for additional bus capacity or additional buses cannot be determined. Table 3-7 of the County Plan identifies a total of 34 buses with a total capacity of 1414 people.

The County Plan, Appendix D, p. D-2, states that discussions are currently being held with the school bus companies to develop agreements relative to their roles in the Plan. Until these letters of agreements are obtained, bus availability cannot be assured.

Contention 15.(a)

The County Plan does not detail what type of health services will be provided for persons who are in institutions or under care on an outpatient basis prior to the accident. It does not specify which hospitals they will be taken to. The plan does not consider the number of patients to be cared for.

Response

Contention 15(a) implicates sec. 1.2.7 of the County Plan. NUREG-0654 Planning Standard L. Medical & Public Health Support Services only requires planning for medical services of contaminated injured individuals Planning Element J.10.d does require planning to protect persons "whose mobility may be impaired due to such factors as institutional or other confinement." This would include persons in hospital, nursing houses, or persons confined to there houses.

Sec. 1.2.7 of the County Plan places the responsibility for providing continuing services for these individuals with the County Health and Medical Team. The Administrator of the Coffey County Hospital is responsible for arranging emergency transportation for the Hospital patients and residents of the Golden Age Lodge through the County Engineer and Coffey County Ambulance Services, sec. 1.2.7, p. 1-9. Sec. 1.2.7 places responsibility for compiling a list of non-institutionalized county residents who may need special evacuation assistance and with the County Health Nurse for this person to provide this list to the Emergency Preparedness Coordinator.

Contention 15.(a) Cont'd

The Plan anticipates evacuation of the Hospital and Golden Age Lodge in the event of a Site Area or General Emergency. CPIP No. 21, Sec. 21.3. Patients at the Hospital will be evacuated to hospitals in surrounding counties. Residents of the Golden Age Lodge initially will be evacuated to Newman Hospital in Emporia and then to other nursing homes as space is available, County Plan, sec. 3.3.2., p. 3-6.

The plan in general meets the criteria of NUREG-0654 except in the following areas:

- 1) Letter of Agreement with the Newman Hospital, specifically identifying the average available bed capacity and willingness to accept the residents of Golden Age Lodge, is necessary.
- 2) Amend EBS Announcement # 6, County Plan, Appendix L, Item 10, p. L-14, which states that patients in the Coffey County Hospital and residents in nursing homes (this should be identified as only the Golden Age Lodge) will be evacuated to registration centers. It further informs family and friends not to pick them up.

Contention 15.(c)

Coffey County does not have sufficient transportation (ambulances, buses, etc.) to evacuate people from nursing homes and the Coffey County Hospital.

Response

Appendix K, p. K-6 of the County Plan, states that the Coffey County Hospital has a capacity of 16 beds. For purposes of the Evacuation Time Estimate, the County Plan states that, on the average, only 4 of the 26 persons would require ambulance type transportation. The Golden Age Lodge has a capacity of 115 beds. The Evacuation Time Estimate allows for 20%, or 24 residents, who would require ambulance transportation.

County Plan Appendix K, Table K-4, p. K-13, identifies the number and capacity of vehicles for non-ambulatory persons which will accommodate the anticipated non-ambulatory nursing home residents and hospital patients. Appendix K, Table K-3, identifies the number of school buses that are available and their seating capacity. These are the same school buses that are to be used to transport the school children. The plan indicates that these buses will be used to evacuate the Golden Age Lodge after the schools are evacuated.

As previously indicated in Contentions 14.(b) and 14.(d), the number of children in private schools presents an unknown population which should be transported by these buses. This needs to be resolved before the issue of sufficient transportation can be addressed. Letters of Agreement should be

Contention 15.(c) Cont'd

obtained from the school bus companies serving the county areas which are not to be evacuated. The additional capacity should accommodate the nursing home residents, hospital patients and private school children.

Contention 15.(e)

The County Engineer will not be able to provide transportation to evacuate people from nursing homes and the Coffey County Hospital because of other duties that he has in the time of an emergency response.

Response

The Health and Medical Management Team Leader will determine the transportation resources required per County Plan CPIP No. 21, sec. 21.3.7, p. 4 of 7. He will then inform the County Engineer and request evacuation assistance. As indicated in the County Plan CPIP No. 17, sec. 17.3.12, this is done upon request as a function of dispatching available resources. The County Engineer should be able to perform this function adequately.

Contention 15.(g)

Due to insufficient staffing, Coffey County cannot assist with evacuation of nursing homes. Although 15 personnel would be required to fill this function, none are presently available.

Response

NUREG-0654, element J.10.g., requires means of relocation be provided. The plan provides for the Health and Medical Management Team Leader assessing the transportation needs of the nursing home residents and the County Engineer dispatching those modes of transportation.

The nursing home has an evacuation policy, procedures and staff available to perform the evacuation County Plan sec. 3.3.2, p. 3-6. These procedures were not provided for review. Therefore, there has been no identification of insufficient staff or the request for additional support in order to determine if additional staff were required.

Contention 15.(h)

Due to insufficient staffing, Coffey County cannot provide ambulances for emergency patients and at the same time provide for evacuation of hospital patients. Although six personnel would be required to fill this function, none are presently available.

Response

County Plan, Appendix K, sec. 2.0, p. K-6, identifies an average of four non-ambulatory hospital patients and approximately 30 non-ambulatory nursing home patients. Table K-4, p. K-13, further lists sources of transportation for non-ambulatory persons totalling 94 persons. This is sufficient coverage and can free ambulances which may be required to respond to an emergency. The availability of a vehicle presupposes it has, at the very minimum, a driver to transport the patient. The requirement for an additional 6 persons is unwarranted.

Contention 15.(i)

Due to insufficient staffing, Coffey County Hospital cannot provide for the special treatment of emergency patients and at the same time assist with evacuation of its regular patients. Although 6 personnel would be required to fill this function, none are presently available.

Response

Staffing figures for Coffey County Hospital are not provided in the plan. This is not a normal review element per NUREG-0654. However, no determination of adequacy could be determined from the information available. No statements have been made as to how emergencies might be handled in hospital SOPs for prioritizing emergencies. There is no indication that the hospitals will require additional staff except for drivers of evacuation vehicles.

IMAGE EVALUATION
TEST TARGET (MT-3)

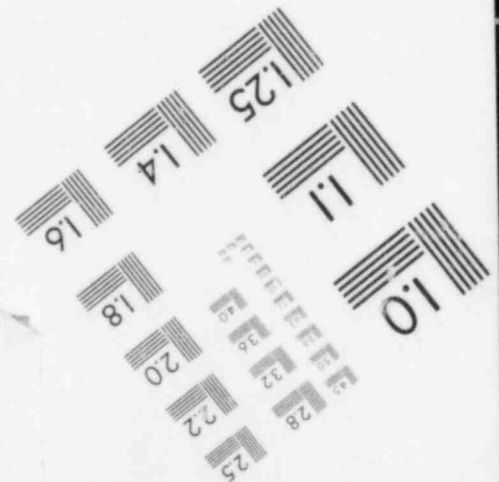
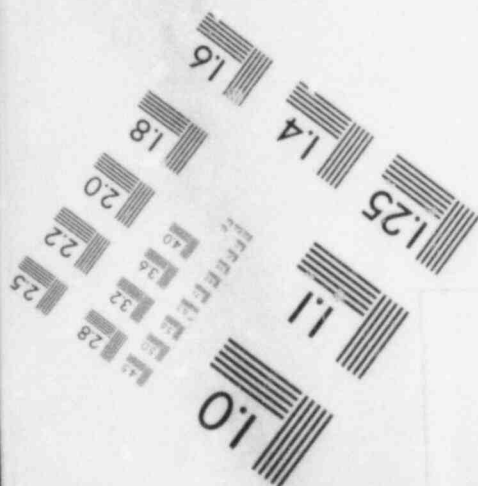
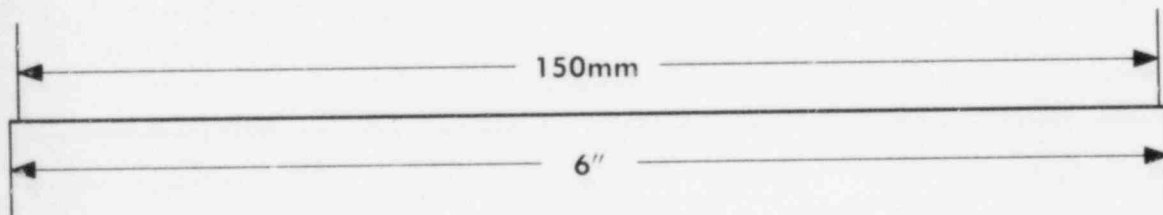
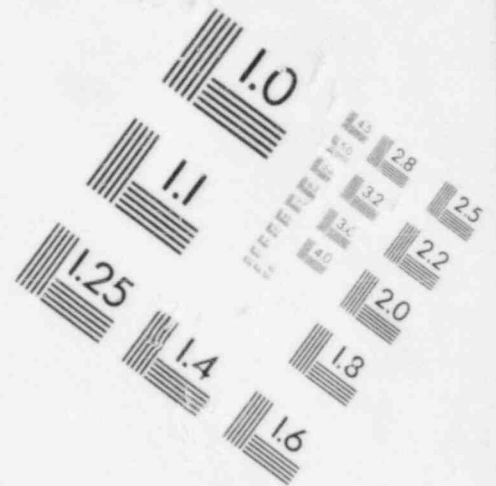
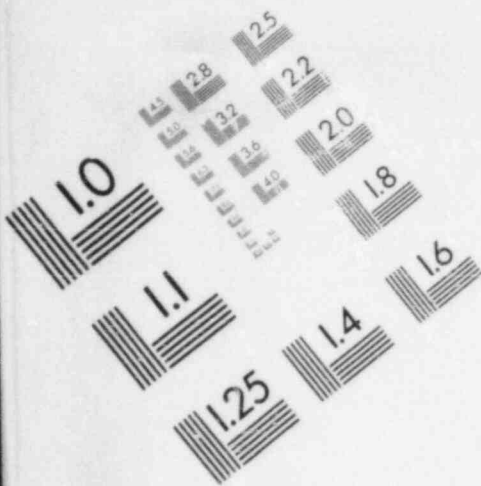
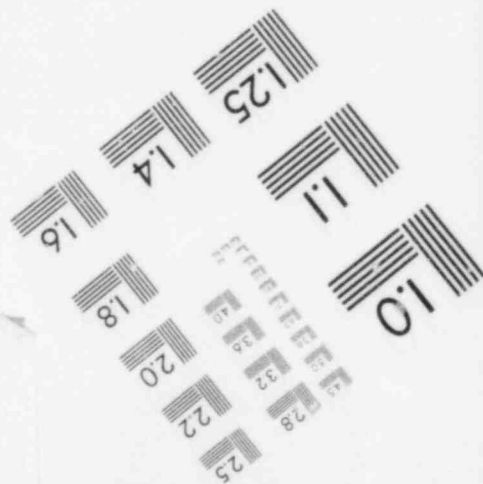
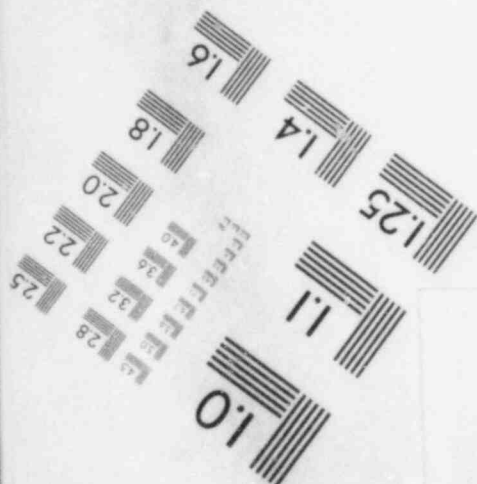
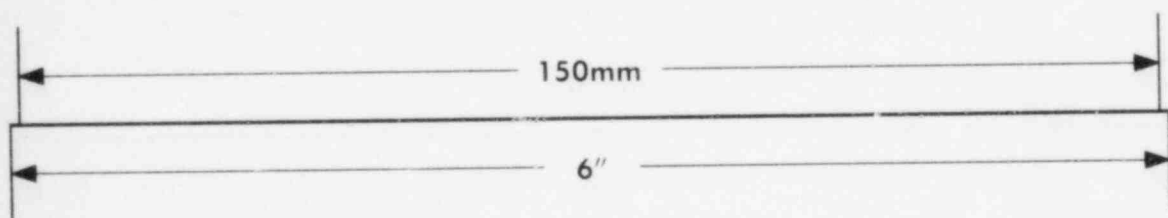
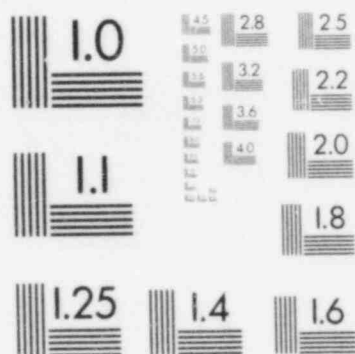
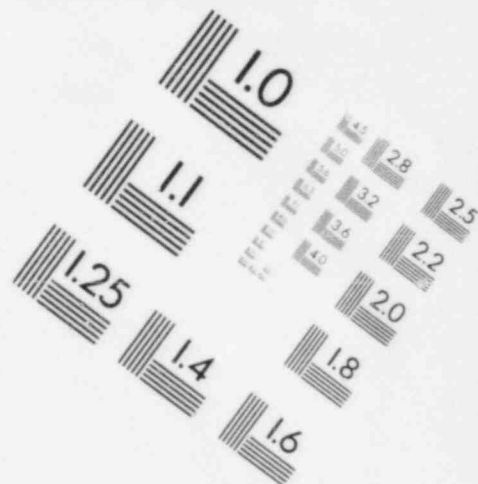
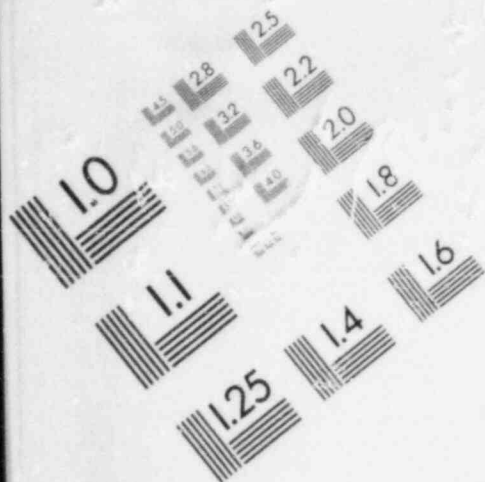


IMAGE EVALUATION
TEST TARGET (MT-3)



Contention 15.(k)

The County Plan is deficient because it indicates that the patients at hospitals and nursing homes may have their evacuation delayed or postponed until dose rates of radiation at the facility result in projected doses for evacuation. There is no means to check when the dose rates reach such a level and such a concept endangers the patients.

Response

The County Plan, sec. 3.3.2., p. 3-7, states the decision to evacuate the hospital or nursing home is based on dose projections from WCGS and the results obtained by the Radiation Monitoring Teams. This is the basis upon which all evacuations are determined. The Radiation Monitoring Teams are in the field taking sample readings and reporting them back to give up-to-date accurate readings. These readings will indicate whether the projected dose is proceeding as anticipated, or should be adjusted. Protective actions will be adjusted accordingly.

Contention 15.(1)

The County Plan is deficient because the Health and Medical Management Team is supposed to have access to the Coffey County Ambulance Service, but there is no provision about what to do if the Coffey County Ambulance Service is required to assist with other duties during an evacuation.

Response

The County Plan, sec. 3.3.2, pp. 3-6 & 3-7, indicates the County Engineer may utilize Coffey County ambulance; and, under prior arrangements, he can call ambulances from Anderson, Lyon and Osage Counties, as well as Humboldt and Iola. With the assistance of additional transportation available for non-ambulatory persons, it may be possible for the Coffey County Ambulance Service (or another mutual aid ambulance) to respond to other duties during an emergency. Response times for the majority of these vehicles is 1.5 hours, County Plan, Appendix K, sec. 2.0, p. K-7.

Contention 15.(n)

The County Health Nurse has not compiled a list of County residents who are shut-ins or who may need special evacuation assistance.

Response

NUREG-0654, element J.10.d., requires that State and local governments provide means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement.

The County Plan, sec. 1.2.7, p. 1-9, states that the County Health Nurse will compile a list of County residents who may need individual notification and/or who may need special evacuation assistance, and provide this information to the Emergency Preparedness Coordinator to assist him in maintaining a current list of those persons requiring special assistance. The County Plan, Appendix H, 3.0, p. H-8, further states that provisions are provided for individual alerting of persons, who, due to deafness or other reasons, cannot hear the sirens or tone alerts. In compiling the list, the County Health Nurse should specifically identify hearing impaired persons in order to facilitate their alert and notification.

Contention 15.(n) Cont'd

Due to the fact that this list changes periodically, it is not unusual that the list has not been compiled at this time. It is agreed that this list is necessary, should be compiled and remain current.

FEMA will check to insure that this list has been compiled during the first exercise of the plan.

Contention 15.(o)

The County Plan does not make adequate provision for preparing a list of County residents who are shut in or who may need special evacuation assistance, and does not make adequate provision for updating the list as changes occur.

Response

See response to Contention 15.(n).

In addition, the County Plan, secs. 1.2.3.(5) and 1.2.3.(1), states that the County Emergency Preparedness Director maintain a current list of persons within the effective 10-mile EPZ requiring special evacuation assistance (other than Coffey County Hospital patients or Golden Age Lodge residents) and provide a copy of this list to the County Engineer. He must then annually certify the accuracy of the plan.

Provisions for preparing the list should be in the SOP for the County Health Nurse. There should be a provision for the County Health Nurse to amend the list as changes are known. Periodic distribution of these changes should be made.

The Emergency Preparedness Director certifies, on an annual basis that the Plan is current. The County Health Nurse should verify the information on an annual basis prior to this certification, County Plan, CPIP No. 30, sec. 30.3.1.

Contention 16.(a)

The County Plan does not detail how many individuals will need transportation assistance that the County Engineer is to provide for an evacuation. There is inadequate detail about how the Engineer will know who to evacuate.

Response

NUREG-0654, element J.10.d., requires provisions for the means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement. This element has been interpreted to include individuals without transportation.

Neither the County Plan secs. 1.2.3. (5) and 1.2.7. (1), Appendix K, nor the County Plan CPIP No. 17.3.12 identify or even estimate the number of transportation dependent individuals. Sec. 1.2.5 indicates that individuals requiring "special emergency transportation" will be identified by several methods including through the annual mailing of the Emergency Planning Brochures. Other transportation dependent people could be identified in this manner, but the Plan contains no provision to do so. Sec. 3.5 indicates that persons without transportation in an emergency could call a designated phone number. Pre-established routes should be established with specified pick up points for transportation dependent people who are identified in advance. This information should be provided in the Emergency Planning Brochure. An assessment of adequacy cannot be made from the information provided for review.

Contention 16.(b)

Coffey County will not be able to identify in advance the people who will need emergency transportation, because it is inadequately staffed.

Response

The County Plan, sec. 1.2.5, (1), p. 1-7, provides that persons who will need emergency transportation are identified with the aid of the County Health Nurse, physicians, family members, the County Survey and the annual mailing of the Emergency Planning Brochure. Persons not requiring "special emergency transportation," but who are normally without transportation during the day, or at other times, should also be identified through the annual mailing of the Emergency Planning Brochure.

It does not appear that additional staff would be required for this identification process.

Contention 16.(d)

There are no people available to coordinate the evacuation of individuals without transportation. Ten or more people would be required for this function.

Response

NUREG-0654, element J.10.g., states that means of relocation must be provided.

See the response to 16.(b). In addition, it would be recommended that routes be established for the pick-up of these people who have been identified in advance as being transportation dependent. Bus drivers should be familiar with the names of the people and their locations in advance.

Separate buses could be reserved for call-ins which fall outside of or in addition to the predesignated routes.

This would then be a coordinating and dispatching role for which one person, in this case, the County Engineer, should be adequate.

Contention 16.(e)

Because of other duties, the County Engineer will not be able to provide the emergency transportation in the event of an evacuation.

4
Response

See the responses to Contentions 14.(d), 15.(e), and 16.(a).

Contention 16.(h)

Due to insufficient staffing, Coffey County cannot adequately aid in providing transportation for evacuation for those who do not have their own means of transportation. At a minimum, 100 people will be required to perform this function. At least 10% of the people to be evacuated will be without transportation. None of the people required to perform this function are available.

Response

See response to Contention 15.(a). In addition, neither sec. 3.5, p.3-8 nor 1.2.5, p. 1-7, of the County Plan, estimates the number of transportation dependent people other than for the schools, the nursing homes and the hospital.

Since transportation will have to be provided, it is reasonable that educated estimates of this population be made for planning purposes. Persons who are usually without transportation during the day, or at other times, should be identified in advance. However, the Plan does not make any provision for this. Even after a list is available, additional people, such as people whose spouses have the family vehicle or whose cars are broken down, may have to be factored in for potential transportation needs. The County Plan does provide for transporting these people in sec. 3.5, p. 3-8. This number will never be exact. At this time, however, estimates of the number of people required to transport them should be made.

Contention 16.(i)

The Engineer does not have control over fire personnel. Therefore, he will not be able to direct them in regard to transporting individuals who do not have a private automobile.

Response

The County Plan, sec. 1.2.5., has deleted all references to the Engineer's use of fire personnel. Therefore, this point of potential conflict has been eliminated.

Contention 16.(1)

There are not enough vehicles available to provide transportation for those who do not have their own means of transportation.

Response

See the response to Contention 16.(h) for transportation of transportation dependent people in addition to those from schools, nursing homes, and hospitals. For the school population see the response to Contention 14.(b) and 14.(c).

Until the estimate of this "unconfined" population is identified, no determination of adequacy can be made.

The County Plan, Appendix K, Tables K-3 and K-4 pp. K-12 & K-13, identify available buses and transportation for non-ambulatory persons.

Contention 16.(m)

The Engineer has not made arrangements to obtain school buses.

Response

At the time of Plan submission, the County Plan, Appendix D, p. D-2, states that discussions are being held with Unified School Districts # 243, 244, 245 and associated school bus companies to develop agreements relative to their roles in the County Plan.

Until these Letters of Agreements are written and signed, one cannot assume the availability of these school buses. FEMA will require the submission of these letters of agreement before it determines that there are adequate arrangements for school buses.

Cor'ention 16.(n)

The County Plan is deficient because the school buses listed in Table 3-8 will be required for evacuation of school children and will not be available to provide other emergency transportation.

Response

This table is now referenced in County Plan, Appendix K, Table K-3. School bus capacity exceeds school enrollment, therefore, additional seats and vehicles could be used to provide other emergency transportation. In addition, bus capacity is available from buses serving schools which are not required to evacuate. These buses are identified as potential resources for additional needs.

Contention 17.(b)

There is no indication how the John Redmond agencies will coordinate their response to an accident with the response by Coffey County.

Response

The County CIPs Nos. 2 and 3, indicate that the Sheriff's Dispatcher will notify the U.S. Fish and Wildlife Service, the Kansas Fish and Game Commission, and the U.S. Army Corps of Engineers, for an Alert, Site Area Emergency, or General Emergency. These are the agencies that manage the John Redmond Reservoir.

Their response to the need for sheltering or evacuation is expected to be according to the draft evacuation procedures provided for each agency in the County Plan, Appendix I. At the time of this response, these procedures were being reviewed by the parties prior to approval. The procedures include provisions for notification of visitors to tune to the Emergency Broadcast System for announcements (sec. 4.2), dissemination of information on evacuation routes, and confirmation of evacuation. The procedures also indicate follow-up contact with the County Sheriff to report their status, and other John Redmond Reservoir agencies to determine the need for assistance.

FEMA will follow these negotiations to assure there is a Letter of Agreement.

Contention 17.(c)

There are no detailed letters of agreement between the County emergency response organization and those agencies responsible for evacuation of John Redmond transients.

Response

The County Plan, Appendix D, p. D-11, presents a letter from the Kansas Fish and Game (KF&G) to the Chairman of the Coffey County Board of Commissioners, providing assurance that the KF&G will respond in a specified manner. The specifications do not relate directly to the evacuation procedures discussed in the response to Contention 17.(b), but do generally account well for these procedures.

The County Plan does not provide Letters of Agreement with the U.S. Fish and Wildlife Service (USFWS) nor the U.S. Army Corps of Engineers (USCOE). Appendix D, p. D-2, does indicate discussions are being held with the USFWS to develop an agreement. Appendix D, p. D-13, indicates that the USCOE has not signed a letter of agreement but has agreed to respond to an emergency at the request of the County Sheriff, under the direction of Army Regulation 500-60. There is no written confirmation of this agreement from the USCOE, nor is there an indication of what the USCOE's response under Army Regulation 500-60 would involve.

Contention 18.(a)

The County Plan does not provide for enough traffic control. There is too little traffic control provision within the ten-mile EPZ.

Response

NUREG-0654, element A.2.a., states that each organization shall specify the functions and responsibilities for major elements and key individuals by title of emergency response including traffic control. This can be done in a concise summary such as a chart of primary and support responsibilities.

The County Plan, sec. 3.6.2., p. 3-9, states that traffic control needs during an evacuation are minimal due to available route capacity. However, traffic control positions are established at major intersections, as shown in Figures 3-3 to 3-5, pp. 3-18, 3-19, 3-20. These positions are temporary and are relinquished through the direction of the County Sheriff, after the majority of evacuees have departed. We have had concurrence from the Federal Highway Administration Office that the route capacities are reasonable.

Contention 18.(c)

The County Plan is deficient because it does not specify where and how other law enforcement agencies will assist in the control of evacuation routes.

Response

The County Plan, secs. 3.6.1 to 3.6.3, pp. 3-8 and 3-9, identify other law enforcement agencies which may be requested to assist in areas of roadblocks, traffic control, and access control. The County Plan CPIP No. 9, sec. 9.3.11 to 9.3.15, p. 5 of 14, and CPIP No. 10, sec. 10.3.10 to 10.3.16, pp. 5 and 6 of 14, detail how the Sheriff, in coordination with the County Engineer, will carry out the assignment to control evacuation routes.

Contention 18.(d)

The County Plan does not indicate how a status log for each roadblock will be maintained.

Response

The details for maintenance of a roadblock status log fall outside of any required elements of NUREG-0654. Forms could be designed and included in checklists or SOPs for people manning these roadblocks, but they would not be required to be included in the plan.

Contention 18.(e)

Due to insufficient staffing, Coffey County cannot provide adequate traffic control and roadblocks. Approximately 222 to 227 personnel will be required to perform these functions.

Response

The County Plan, CIPs No. 9, Attachment 9-1, pp. 7 & 8 of 14, No. 10, Attachment 10-1, pp. 7 & 8 of 14 and No. 17, Attachment 17-1, pp. 6 & 7 of 14, detail the Evacuation Control sequence of the County Engineer and the County Sheriff. Sec. 3.6.1, p. 3-9, states the personnel required for the roadblocks are requested from the State when Coffey County personnel resources have been exhausted. The National Guard is identified as being a source of some of these individuals. With the National Guard as a resource, the County should be able to request that they man the secondary roadblock areas to assist with area security.

Contention 18.(k)

Because there are not enough law enforcement people for traffic control, too many people may use one evacuation route and not the one they are supposed to. This will substantially increase the evacuation time.

Response

The County Plan, CPIP No. 17, Attachment 17-1, pp. 6 & 7 of 14, identifies Traffic Control Points to be staffed by the County Sheriff. For a 10 mile evacuation, p. 7 of 14, traffic control position number 4 will be staffed by Kansas Highway Patrol personnel. This is consistent with County's role as stated in sec. 3.6.2, p. 3-9, that these positions be manned by available Sheriff's deputies or other law enforcement personnel (e.g., Kansas Highway Patrol).

The Public will be informed of the evacuation routes through their emergency brochures (not provided for review) and through the Emergency Broadcasting System (EBS) messages. There is no assurance that the public will take the evacuation route for their subzone, since many may detour to either pick up friends and family in the affected area or to relocate with family and friends in unaffected areas.

Traffic capacities are not excessive. Therefore, some shifting to an alternate evacuation route does not appear to present a problem.

Contention 18.(1)

The County Plan does not specify the type of equipment that will be needed at the roadblocks and at the traffic control locations.

Response

NUREG-0654 does not specify that the type of equipment needed at roadblocks and at traffic control points be listed. However, since the County is planning to staff these positions with personnel from both the Sheriff's office and County Engineer's office, checklist of equipment should be available, but only need to be referenced in the Plan.

Contention 18.(m)

The County Engineer does not have enough vehicles, equipment, and barricades to handle the roadblocks required under provisions of the plan.

Response

The County Plan CPIP No. 17, p. 6 of 14, identifies 4 priority roadblock and access control positions to be staffed by the County Engineer and 3 to be staffed by the County Sheriff.

Additional vehicles and staff can be requested from other law enforcement sources. Table 3-9, p. 3-35, identifies 57 secondary roadblocks for a 0-10 mile evacuation. The number of available barricades has not been identified. Therefore, it cannot be determined from the information provided whether additional resources will be required. There has been no provision for requesting additional barricades.

The County Plan CPIP No. 10, Attachment 10-4, pp. 13 and 14, indicate the location of the secondary roadblocks. However, the Plan does not identify the number and location of available barricades. If additional barricades are needed, the source(s) and response time(s) for their receipt should be listed.

Contention 18.(p)

The County Plan should specify how many people will be required and the equipment that will be provided to maintain access control.

Response

The number of staff should be identified for the average control point. However, the type and quantity of equipment need not be included in the Plan. A checklist could be available with appropriate quantities of equipment required. This list could be referenced in the plan.

Contention 18.(q)

The County Plan is not sufficient because it does not contemplate the amount of resources that will be required from the State to assist with access control.

Response

See response to Contention 18.(p).

Contention 18.(r)

The County Plan is deficient because it does not provide that the entire evacuated area will be blocked. It only contemplates that it will be blocked as resources become available.

Response

Although the County Plan, sec. 1.2.2 (10), p. 1-4, states that the County Sheriff will obtain resources to secure the evacuated area and to maintain law and order in Coffey County on a continuous basis (24 hours), the County has made no provisions to staff secondary roadblocks, even after additional law enforcement assistance is provided. We must agree that security could not be maintained. There is nothing to deter individuals from ignoring unmanned barricades. Therefore, it is recommended that these roadblocks be staffed when personnel become available.

Contention 18.(s)

The Sheriff does not have the personnel available to handle access control to the area evacuated.

Response

See response to Contention 18.(e) and 18.(r).

Contention 18.(t)

The County Engineer does not have sufficient personnel to supplement or relieve the Sheriff's Office personnel in maintaining access control.

Response

This number of personnel available from the County Engineer and their projected individual responsibilities has not been provided for review. Therefore, we are unable to determine if there will be sufficient County Engineering personnel or not.

Contention 18.(u)

Because the Radiation Monitoring Team may be required to do other things, it will not be possible for it to provide dosimetry for access to an exit from the evacuated area.

Response

NUREG-0654, element I-7, requires each organization 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 utility. The County Plan, sec. 3.6.3., p. 3-9, does state that after an evacuation, County radiation monitoring personnel will be used for radiological monitoring at access control points to monitor equipment and personnel exiting the controlled area. Sec. 3.10, p. 3-12, confirms this role and states that one radiation person is assigned to each access control point, and of the fourteen radiation monitoring personnel who receive training in environmental sampling and surveying in addition to normal radiation monitoring, up to seven will be assigned to joint radiation monitoring teams (Coffey County, KG&E and the State of Kansas).

Radiation Monitoring Personnel from the host areas will provide that service at the registration centers. (County Plan, sec. 3.10, p. 3-13; Appendix J, secs. 5.0, pp. J-6 and J-7, J-13 and J-14, J-20 and J-21, J-27 and J-28.)

Contention 18.(u) Cont'd

The County plan identifies the resources per the NUREG, but it does not delineate the number of trained Radiological Monitors. It alludes to a number in sec. 4.3.1, p. 4-2, by stating Coffey County has approximately 41 radiation monitoring kits. The State has provided confirmation of at least 45 trained radiological monitors - see Contention 19.(f). Radiation monitoring kits are issued to all county radiation monitoring personnel and Sheriff's deputies. There are seven access control points, per the County Plan, Table K-9, p.3-35, if evacuation were recommended for the entire 10 mile EPZ. These staff are slated for one function - not multiple duties. Therefore, one cannot determine inadequacy as a result of being assigned to other things.

Contention 18.(v)

The Sheriff does not have the equipment available to handle access control to the area evacuated.

Response

See response to Contention 18.(1).

Contention 18.(w)

The Engineer has not obtained the resources needed to set up barricades for 24 hours per day following an evacuation. There is not enough communications equipment for use at the roadblocks.

Response

See response to Contentions 18.(l) and 18.(m).

A Sheriff's car will be at a priority roadblock, therefore, there will be sufficient communication at those roadblocks.

Contention 18.(y)

The County Plan must specify who will be responsible for providing security for the evacuated area on a 24-hour per day basis and the details of what will be done.

Response

The County Plan, sec. 1.2.2(10), p. 1-4, states that the County Sheriff will obtain resources to secure the evacuated area and to maintain law and order in Coffey County on a continuous basis (24 hours per day). Table 1-1, p. 1-13, assigns the primary responsibility for this to the Sheriff. Sec. 3.6.1, p. 3-9, states that security for the evacuated area is provided by the County Sheriff by utilizing personnel to patrol the area and may include use of the National Guard. Since this is an extension of normal law enforcement policy, procedures for this are not required to be included in the plan. However, there have been no provisions in the plan to staff the unmanned roadblocks once the additional law enforcement personnel have arrived. This appears to be inconsistent with securing an area. Therefore, it is recommended that these roadblocks be staffed when personnel become available.

Contention 18.(aa)

The Sheriff does not have enough personnel to secure the area on a 24-hour per day basis.

Response

See response to Contention 18.(r).

Contention 19.(d)

The detail of the duties of the Radiological Defense Officer during an accident are not sufficiently specified.

Response

NUREC-0654, sec. J., p. 29, states: "The plans should be kept as concise as possible. The average plan should consist of perhaps hundreds of pages, not thousands. The plans should make clear what is to be done in an emergency, how it is to be done and by whom." Review of the County Plan indicates that the Radiological Defense Officer has adequately detailed duties so that it would be reasonable to expect that a certified Radiological Defense Officer would be able to perform. The Plan, sec. 1.2.10, p. 1-10, specifies the eight assigned functions of the Radiological Defense Officer. Additional detail are established in the County Plan, CPIP Nos. 26 and 27.

Contention 19.(e)

There is no person designated or trained to act for the Radiological Defense Officer if he is not available or is to be relieved during an accident.

Response

Although NUREG-0654 does not specifically require the appointment of an alternate Radiological Defense Officer, the prudent planner should be expected to plan for an alternate designee when dealing with key personnel. An alternate Radiological Defense Officer is provided for in the County Plan, sec. 1.2.10, p. 1-11.

Contention 19.(f)

The County Plan does not contemplate what to do if members of the Radiation Monitoring Team are not available.

Response

NUREG-0654, element I.8., certainly implies that the Radiation Monitoring Team be prepared to function in the event some team members are not available. At the time the plan was drafted, adequate trained personnel were not available for inclusion in the plan. The State of Kansas has confirmed that subsequent training has resulted in the availability of at least forty-five trained personnel (see attachment A). With current trained personnel levels as they are, the plan should make reference to the team and appropriate numbers of alternates.

Contention (g)

The County Plan indicates that the Radiation Monitoring Team personnel can be on the scene within 45 minutes after notification. This is too long a period.

Response

NUREG-0654, element I.8., requires "each Organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways." The term "rapid assessment" is not further defined as to time increments or acceptable levels in delay. Forty-five minute response time, however, should be considered quite reasonable, particularly in light of the following: (1) 45 minutes represents a worst-case scenario, actual response time could be considerably less, (2) KG&E Radiation monitoring team personnel will provide interim monitoring which provides for immediate coverage (sec. 3.1.4, Final Safety Analysis Report, SNUPPS-WC), (3) Computer data from the site provides realistic estimates and adequate substitution for monitoring in the interim period between release and operational status of the county monitoring team (sec. 3.1.3, Final Safety Analysis Report SNUPPS-WC). Concern over 45-minute response time appears to an unrealistic concern.

Contention 19.(h)

The County Radiation Monitoring Team has not been selected.

Response

The Contention reflects accurately the existing situation. The State of Kansas has informed the FEMA Office that the County Radiation Monitoring Team will be selected in December, 1983 upon completion of the final training session for potential Radiation Monitoring Team members. Once the team is selected, a list should include alternate team members in the County Plan.

Contention 19.(1)

The County Plan is deficient because it does not state how many members of the Radiation Monitoring Team will be required, and does not contemplate enough people to handle the duties of the Radiological Monitoring Team.

Response

Per discussions with the State RDO, it has been pointed out to FEMA that Kansas State Health Department and experts representing KG&E have determined that an emergency at the nuclear facility would require the deployment of five radiological monitoring teams. To be on the cooperative side, the county has planned for adequate staff to support seven teams with fourteen personnel on twelve hour shifts (County Plan, sec. 3.10). The seven teams will consist of one representative from the County, State and KG&E, resulting in a minimum of a three-man team. The County Plan, sec. 3.10, p. 3-12, calls for fourteen personnel to man the teams in twelve hour shifts on a 24-hour basis. The State of Kansas has verified that the County currently has more than three times the required number of trained certified personnel to man the fourteen positions. (See Contention 19.(h).) This contention presents an inaccurate representation of the facts as they now stand. The plan satisfies the requirements of NUREG-0654.

Contention 19.(j)

Due to insufficient staffing, Coffey County cannot provide radiological monitoring. Although 45 persons are needed to fill this function, only one Radiological Monitor is presently available.

Response

Although this contention was correct in January, 1982, it is currently inaccurate. There is no way to ascertain where the requirement for 45 persons originated, but regardless of the acceptability of that figure, existing records, maintained by the State RDO, reflects that more than 45 personnel have been certified for Radiological Monitoring Team duties by the State of Kansas. This contention as no longer reflects a valid concern. The State of Kansas has agreed to provide a letter certifying the availability of trained monitors as requested by FEMA, Region VII.

Contention 19.(k)

Coffey County will not be able to perform decontamination and radiation checks within the County and at evacuation centers, because it is not adequately staffed. There is no provision in the County Plan for an adequate number of personnel to supplement the County Radiation Monitoring Team in order to check evacuees and vehicles at shelters for contamination. The Coffey County Plan shows 104 people will be needed at the evacuation centers for contamination checks (page 3-8). None of these are available. At least 150 will be needed for this. The plan does not specify how they will be recruited. Also, there are no people available at the evacuation centers to handle decontamination. It is possible that as many as 100 people will be required for decontamination.

Response

NUREG-0654, element J.12., states: "Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers."

The contention maintains that there are insufficient Coffey County personnel to monitor evacuees and vehicles arriving at shelters for contamination and to decontaminate if required. But these functions are not

Contention 19.(k) Cont'd

performed by Coffey County personnel. The County Plan, sec. 3.7, p. 3-10, states: "Host county radiation monitoring personnel check evacuees and vehicles at registration centers for contamination."

Whether the four host counties have the staff to perform the functions assigned to them in the Coffey County Plan, and in the drafts of their individual Shelter Plans (Coffey County Plan, Appendix J), cannot be determined from the material provided for review.

Contention 19.(1)

The Fire Leader does not have enough personnel to conduct the decontamination activities.

Response

NUREG-0654, element K.5.b., states: "Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal."

As pointed out in the Response to Contention 19.(k), decontamination activities at relocation shelters are carried out by host county personnel. The Fire Leader "is responsible for dispatching fire trucks to be used for decontamination activities at the access control positions" (County Plan, sec. 3.7). The decontamination activities referred to are for emergency workers and their vehicles (See CPIP No. 19.3.6) and not for evacuee vehicles, since the latter are to be checked and decontaminated at relocation centers.

The maximum number of access control points for a ten mile evacuation is seven, County CPIP No. 19, Attachment 19-3, p. 7 of 7; County Plan, Table 3-9 p. 3-35.

Whether or not the Fire Leader has enough personnel at his command to conduct decontamination activities for emergency vehicles at the access control points can not be determined from the material provided for review.

Contention 19.(1) Cont'd

Neither the County Plan nor the County CPIP provide sufficient information regarding the availability of fire personnel and equipment to determine whether or not there are adequate numbers to carry out there assigned responsibilities under the plan. Appendix D, p. D-2 of the County Plan, states that discussions are being held with the Fire Department in Coffey County to develop agreements relative to their roles in this plan. Based upon this statement we must await that agreement in order to be sure that the Fire Department in Coffey County will carry out functions assigned under the plan.

Contention 19.(m)

Fire Department personnel may be needed elsewhere at the same time they are needed for decontamination purposes.

Response

NUREG-0654, element K.5.b., states: "Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal."

It is not possible, from the material provided for review, to gauge the capacity of the personnel under the direction of the Fire Leader to carry on decontamination activities and to fill other needs which may arise simultaneously.

See Contention 19.(l).

Contention 19.(o)

Due to insufficient staffing, Coffey County cannot provide for decontamination at roadblocks. Although 16 personnel are needed to fill this function only eight Burlington Fire Department personnel are presently available.

Response

See response to Contention 19.(1).

Contention 19.(p)

The County Plan does not provide for the number of radiation monitoring personnel that will be required to check vehicles and people for contamination at access points.

Response

NUREG-0654, element K.5.b., states: "Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal."

The County Plan, sec. 3.10, pp. 3-12 and 3-13, states that one Radiation Monitoring person will be sent to each of the seven access control positions. Thus, the County Plan does specify that seven Radiation Monitoring people will be required at any given time. The Plan does not state what kind of shift these people will work (e.g. 8 hour or 12 hour), and it is therefore not possible to determine the total number required to cover an entire 24 hour period (e.g., 21 for 8 hour shifts, 14 for 12 hour shifts).

Contention 19.(q)

The State radiation monitoring equipment is not sufficient to deal with the type of emergency that can occur at Wolf Creek.

Response

It is not clear what this contention means. Comments from the NRC RAC reviewers on the State Plan's coverage of elements I.9. and I.10. of NUREG-0654 are given in the following as being possibly relevant to the intent of the contention.

NUREG-0654, element I.9. states: "Each organization shall have a capability to detect and measure radiiodine concentrations in air in the plume exposure EPZ as low as 10^{-7} uCi/cc (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity."

The NRC RAC reviewer made the following comment on the State Plan's coverage of this element: "State Plan states that 'joint teams have the capability to collect and analyze air samples and detect and analyze for radiiodine for concentrations as low as 10^{-7} uc/cc with equipment provided by the licensee.' The State Plan should describe this equipment in next revision. There is no way for reviewer to determine at this point that capability exists."

Contention 19.(q) Cont'd

NUREG-0654, element I.10. states: "Each organization shall establish means for relating the various measured parameters, (e.g., contamination levels, water and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures."

The NRC RAC reviewer commented as follows on the adequacy of the State Plan in covering this element: "Again, the plan indicates a reliance on licensee personnel and equipment. There is little detail regarding the state's efforts to independently assess the situation. Discussions with state officials indicate that state is working toward purchasing the necessary equipment, etc., to achieve a greater capability in this regard (dose assessment, projections, etc.). Revisions to the Plan should note these capabilities when they exist. In addition, the Plan should refer to procedures developed to implement these capabilities."

Contention 19.(r)

The Coffey County Radiation Monitoring Team does not have proper radiation monitoring equipment to monitor radiation in the event of an evacuation.

Response

NUREG-0654, element I.7, states: "Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone which are an intrinsic part of the concept of operations for the facility."

Field monitoring is to be done by personnel on joint teams from the facility, the State, and Coffey County. The County Plan, Table 4-1, p. 4-6, lists the radiation monitoring equipment available to the County. The equipment listed is appropriate for the radiation monitoring tasks assigned to the County.

The NRC member of the RAC commented that the provision for dispatching seven trained monitoring personnel to participate on joint monitoring teams was satisfactory to meet this requirement.

Contention 19.(s)

Coffey County does not have enough radiation monitoring equipment to monitor in the County, to check evacuees for contamination, and to monitor roadblocks and access points.

Response

NUREG-0654, element I.7., states that "Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zones..."

Coffey County personnel will not monitor evacuees for contamination. This is to be done by host county radiation monitoring personnel.

Coffey County also does not provide equipment for the up to seven persons that it supplies to the joint radiation monitoring teams. Field monitoring equipment is provided by the licensee (mainly) and the State.

This leaves the questions of monitoring at roadblocks and access control points. There are seven access control points and the Radiological Defense Officer dispatches one Radiation Monitoring person to each of them. Thus, seven Radiation Monitoring personnel must be outfitted for monitoring at access control points. Table 4-1, p. 4-6, of the County Plan, shows 33 low range CDV-700 detectors, and 71 high range CDV-715 detectors. This means there are

Contention 19.(s) Cont'd

four times as many of the former, and 10 times as many of the latter, as required. Therefore, Coffey County does have sufficient equipment for the radiation monitoring duties assigned to it in the Plan.

Contention 19.(t)

The County Plan is deficient because it does not indicate how the 30 Radiation Monitoring Kits that Coffey County has will be distributed. If the kits are matched with the number of people required to implement the plan and their duties, there will be an insufficient number of kits and equipment.

Response

NUREG-0654, element I.7, states that "Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone..."

In the County Plan, Table 4-1, p. 4-6, 41 kits are listed, not 30 as mentioned in the contention.

The County Plan, sec. 4.3.1, states that radiation monitoring kits are issued to all county radiation monitoring personnel and sheriff's deputies. This is an indication of how the kits will be distributed. Obviously, the kits containing dosimeters will be broken out for further distribution, as required, since there are 214 self-reading dosimeters and 200 TLDs listed in Table 4-1.

Contention 19.(w)

The Coffey County Sheriff's Department needs radiation monitoring equipment.

Response

NUREG-0654 does not specifically require that Sheriff's Department personnel, or other law enforcement officers, be equipped with radiation monitoring equipment; although as emergency workers they would have to be provided with dosimeters.

The Coffey County Plan, sec. 4.3.1, p. 4-2, does state that radiation monitoring kits are issued to Sheriff's deputies.

Contention 19.(x)

There is no adequate provision for insuring that the County radiation monitoring equipment is properly listed and maintained so that it will be in working condition at the time of an emergency.

Response

According to the County Plan, sec. 4.3.1., pp. 4-2 and 4-3, the Radiological Defense Officer is responsible for checking the contents of each kit and testing the operability of each detector at least once a calendar quarter. The equipment is calibrated by the Kansas Division of Emergency Preparedness in accordance with Tab H, sec. 1.6 of the State Plan. This is accomplished by exchanging the radiation monitors in the kits for calibrated monitors supplied by the Kansas Division of Emergency Preparedness.

NUREG-0654, element H.10., requires provisions be made to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. The plan addresses the quarterly check, but should be amended to provide for operational checks after each use.

This duty is listed again as one of the responsibilities assigned to the Radiological Defense Officer, sec. 1.2.10 (4), p. 1-11, to maintain and check the Coffey County radiological monitoring equipment.

Contention 19.(y)

The Radiation Monitoring Teams do not have enough vehicles for transportation to various sites in the County. The County Plan contemplates that Radiation Monitoring Team members will use their personal vehicles or County vehicles for transportation. There will not be enough county vehicles available and there are no plans to insure that the personal vehicles of the monitoring team will be available.

Response

It is true that the County Plan, sec. 3.10, pp. 3-12 & 3-13 states that the Radiation Monitoring Teams use available county, state, KG&E or personal vehicles for transportation when performing offsite sampling and surveying. The plan provides for dispatching up to seven teams. Therefore, seven vehicles should be identified in advance from whatever source for their use. Seven county vehicles will be used for the seven access control points.

Contention 19.(z)

The Coffey County Radiation Monitoring Team should be equipped with portable communications equipment for contacting others involved in an emergency or an evacuation process. Communication equipment for 18 people is required.

Response

The County Plan, sec. 3.10, p. 3-13, states that all county vehicles are in radio contact with the County EOC. Communications between the joint Radiation Monitoring Teams and KG&Es Emergency Operations Facility are via portable radios provided by KG&E. Communications between KG&Es Emergency Operations Facility and the County EOC is then by telephone or by radio. Figure 4-2, p. 4-5, depicts a communications schematic. Both radio and phone communications are shown between the EOF and the County EOC. No additional communications equipment is required for the Radiation Monitoring Teams.

Contention 19.(aa)

The Coffey County Radiation Monitoring Team does not have the communications equipment it needs to be in touch with the County Emergency Operations Center and others. The Coffey County Plan is deficient where it provides that the Radiation Monitoring Team will communicate with the County EOC by telephone. In all likelihood, there will not be enough telephone lines available so that prompt communication can be accomplished.

Response

See the response to Contention 19.(z).

Contention 19.(cc)

There is no agreement between the County and the fire department about the use of fire department vehicles for decontamination responsibilities.

Response

Appendix D, p. D-2, of the County Plan lists the Coffey County Fire Department as one of the organizations with which discussions are being held to develop agreements relative to their role within the County Plan. It is agreed that this letter of agreement is needed and until it is obtained the availability of the fire department equipment cannot be determined.

Contention 19.(dd)

There are not enough vehicles and decontamination equipment available to meet the decontamination responsibilities at roadblocks, access points, and evacuation centers.

Response

The County Plan, sec. 3.7, p. 3-11, notes that decontamination at access points and roadblocks will be done subsequent to the evacuation for emergency workers and equipment. Personnel and equipment from the Fire Departments will be used for decontamination. The number of available vehicles is not provided, but the available vehicles could rotate among sites. Until the Letter of Agreement is developed, as indicated in Appendix D, p. D-2, the availability to decontaminate at the access control points cannot be determined.

The general public will have their vehicles and personal articles decontaminated at the registration centers. NUREG-0654, element J.12, requires personnel and equipment capable of monitoring all residents and transients arriving at relocation centers within 12 hours. The initial concern is for the public. Sec. 3.7 of the County Plan, p. 3-10, estimates this requirement. Letters of Agreement should be obtained with host county fire departments to identify the number of vehicles required and their understanding of their responsibilities as outlined in the plan.

Contention 19.(hh)

The State Plan does not assume all evacuees will be checked for contamination. The Coffey County Plan does so. The County Plan is deficient because it does not require that all evacuees go to the designated shelter area outside the evacuation zone for a contamination check. Once the evacuees are out of the area, it will not be possible to adequately notify them to go for a contamination check. It must be clear in the plans that all evacuees will be checked for contamination.

Response

The County Plan, sec. 3.8, p. 3-11 states that all evacuees are requested to proceed to the registration center to be registered, to be checked for contamination (as indicated) and, if necessary, sheltered. EBS Announcement #6, Appendix L, Item 9, p. L-14, informs evacuees that they should proceed directly to their designated registration centers which are identified at the beginning of the announcement, p. L-12. They further state that personnel will be available to check for radioactive contamination and to arrange for temporary living accommodations if necessary. There is no guarantee that people will go to these registration centers if they know of friends or relatives in an unaffected area. It is recommended that the EBS announcement be expanded to inform evacuees that they proceed to the registration centers even though they may have provisions for alternate living accommodations.

Contention 19.(hh) Cont'd

The State Plan, Tab. K, sec. 3.1 directs evacuees to proceed to the respective predesignated registration centers for contamination screening, even if they intend to stay with friends or relatives outside of the evacuated area.

Contention 19.(jj)

The County Plan is deficient because it contemplates the impoundment of automobiles. There is nothing in the plan that indicates to the public that this will occur or there is no adequate provision to deal with situations where the public does not want to have the vehicles impounded.

Response

NUREG-0654 has no element bearing directly on this contention.

In the County Plan, sec. 3.7, p. 3-10, we find this statement: "Host County radiation monitoring personnel check evacuees and vehicles at registration centers for contamination. Action is taken to decontaminate if contamination levels are detected which are at or above, twice background. Contaminated vehicles are impounded by the host county sheriff until they can be washed down." Thus, vehicles are only to be impounded if they are radioactively contaminated, and then only until they can be decontaminated through being washed down.

Contention 19.(kk)

The County Plan is deficient because it does not provide for disposal of contaminated equipment, vehicles, decontamination water, or any other materials that might be contaminated.

Response

NUREG-0654, element K.5.b., states that "Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel, wounds, supplies, instruments and equipment, and for waste disposal."

The County Plan, sec. 3.10, p. 3-10, states that the Radiological Defense Officer with the assistance of KG&E is responsible for retrieving contaminated material or clothing collected at registration centers. Contaminated material is disposed of at WCGS with the exception of samples sent to the Bureau of Radiation Control Radiation Laboratory for detailed analysis. Decontamination of persons and vehicles with surface contamination is addressed. However, the contaminated materials to be disposed of at WCGS are not specific as to type. Waste disposal of decontaminated water is not discussed. There is some discussion of waste disposal in the State Plan (secs. 3.6, 3.7), but details of disposal are deferred to the County Plan which does not contain them.

Contention 19.(11)

The time required to provide monitoring of evacuees or shelters will be greater than estimated. It will not be possible to use all the County's radiation monitoring equipment because it will be needed elsewhere. The time is in excess of the time allotted by NUREG-0654.

Response

NUREG-0654, element J.12., states: "Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers."

Coffey County's radiation monitoring equipment will not be used to monitor evacuees at shelters. This will be done by host county personnel using host county equipment. The Coffey County Plan, sec. 3.7, p. 3-10, states: "The effort required to check for contamination of evacuees at registration centers is estimated at approximately 315 instrument-hours. This value results from the peak transient population (1,500) and permanent population in the effective 10-mile EPZ (6,000) and an estimated 2.5 minutes per person. Using all of the host county's radiation monitoring equipment (Appendix J), the job would take less than 12 hours. Other instruments will be requested from the State (120 instruments available) to accelerate this effort."

Contention 20.(b)

The temporary managers of each shelter have not been selected.

Response

NUREG-0654 does not require listing of temporary shelter managers in REP Plans. It may be useful to review the process whereby such personnel would come to be chosen.

In the Coffey County Plan, sec. 1.2.8, the Shelter Systems Officer (who is the County Appraiser) is given these responsibilities: 1) Arrange for registration centers and shelters to accommodate the evacuation of the effective 10-mile EPZ, and 2) Notify (at the Alert level) the host county's Emergency Preparedness/Civil Defense Coordinator. The registration centers in the four host counties are listed and shown in Table 3-4 and Figures 3-6, respectively. According to the draft host county shelter plans (given in Appendix J), the Civil Defense Coordinator of each host county will designate shelters to be used. The Civil Defense Coordinator is also responsible for the setup, staffing and operations of the shelters.

Also, each draft host county plan describes the duties of a "Reception and Care Coordinator." He or she is to open and prepare the registration centers, decontamination locations, and shelters to handle the evacuees; recruit and train volunteers to operate registration and feeding in the shelter facilities; work with the Personnel Resources Coordinator/County Clerk in obtaining

Contention 20.(b) Cont'd

registration personnel; acquire food for the shelter facilities through the Material Resources Coordinator/County Engineer; and maintain registration records of the registration centers and shelters.

Returning to the contention, although temporary shelter managers are not mentioned specifically, it is clear that staffing of shelters is the responsibility of each host county Emergency Preparedness Coordinator. It is also clear that the host county reception and Care Coordinator has managerial responsibilities for both shelters and registration centers. If the draft county shelter plans were to be approved by the host counties, the provisions for managing shelter facilities would be acceptable to FEMA.

Contention 20.(c)

The Shelter Managers at the evacuation centers have not been designated and selected.

Response

NUREG-0654 does not require that REP Plans designate Shelter Managers of Evacuation Centers. However, see the discussion under Contention 20.(b), immediately preceding. From that discussion it should be clear that the Reception and Care Coordinators of the four host counties would either serve as managers of the evacuation centers or secure someone else to do so under their direction. If the draft shelter plans are approved by the host counties, this set-up would be acceptable to FEMA.

Contention 20.(d)

There are no people available to provide management at the evacuation centers. Up to 9,000 people would be evacuated. One person for each 50 people evacuated will be needed. Therefore, 180 people are required. (As amended by the Voluntary Dismissal of Contentions, December 5, 1983.)

Response

NUREG-0654 does not set forth a specific required ratio of managers to evacuees. It does state, in element J.12, that "each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas." The draft host county plans (Coffey County Plan, Appendix J) states that the Reception and Care Coordinators of each host county "recruits and trains volunteers to operate registration and feeding in the shelter facilities." It also states that he/she will work with the "Personnel Resources Coordinator/County Clerk in obtaining registration personnel." The same draft host county plans say the Emergency Preparedness Coordinator "monitors the registration center(s), shelter(s), and radiation monitoring/decontamination activities to determine if additional resources are necessary. "Thus, if the volunteers to be recruited and trained by the Reception and Care Coordinators were not sufficient to handle the flow of evacuees, the Emergency Preparedness Coordinator would go to his County Board of Commissioners who would in turn request help from other counties and state and Federal officials.

Contention 20.(d) Cont'd

It should be noted that the 9,000 figure is the population of the entire county. The contention is thus envisioning a worst case scenario in which the entire county would have to be evacuated. This is not likely. But even in such a case, and even if the 1/50 ratio be taken as mandatory, it might still be possible for local volunteers to handle the task without seeking outside help. This is true because an evacuation of the entire county would most probably involve sending people to all four host counties. Each host county would then only have to muster 45 volunteers apiece. This is a goodly but not a staggering number.

In FEMA's experience in other evacuations a substantial percentage of evacuees go to stay with relatives or friends outside of the affected area and do not require sheltering. Thus, even if 9,000 people were evacuated, experience indicates that a substantial percentage of that number would not require sheltering.

FEMA requests that a list of volunteers trained to deal with evacuees be maintained in the host counties. Such a list is not required by NUREG-0654 to be in the plan.

Contention 20.(e)

There are no details of plans or agreements about plans with the Red Cross or the State Department of Social and Rehabilitation Services.

Response

NUREG-0654, element A.3., requires "written agreements referring to the concept of operations developed between Federal, state, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones" to be included in the plans. The State Plan, Appendix CC, p. 3-7, includes a "Statement of Understanding" between the American Red Cross (Midwestern Area) and the Adjutant General's Department, Division of Emergency Preparedness, State of Kansas. This "Statement" provides a listing of the tasks the Red Cross is prepared to undertake during emergencies. Thus, the contention is mistaken in saying that "there are no details of plans or agreements about plans with the Red Cross."

As for the State Department of Social and Rehabilitation Services, sec. 2.1.2.11 of the State Plan (p. B-17) and Figure B-3 of the State Plan (p. B-23) give the responsibilities of the Department of Social and Rehabilitation Services during a radiological emergency in Kansas. Since this is a State agency, NUREG-0654 does not require a written Agreement from the agency. Here again, it seems that the contention is mistaken. FEMA feels that the specification of the roles of the Red Cross and the Department of Social and Rehabilitation Services are adequately spelled out in the State Plan.

Contention 20.(g)

The Kansas Chapter of the American Red Cross is not adequately staffed or equipped to provide the tasks specified in Section 3.2 of Tab C.

Response

NUREG-0654 provides no specific guidance in replying to this contention. The Red Cross is to function only in a supportive role and its efforts are part of a mosaic of response. In its "Statement of Understanding", the Red Cross does give a list of services to be provided, but these services are only to be available "within the limits of personnel, fiscal capabilities and dictates of the disaster". If the Kansas Red Cross Chapters exceeded their resources, they would call upon other Chapters for help. Through the Regional Headquarters in St. Louis, the Kansas Red Cross could draw upon the resources of 17 states. This should be sufficient resources per conversation with Red Cross representative, 12/1/83.

Contention 20.(h)

The Kansas Department of Social and Rehabilitation Services does not have sufficient staff or equipment to perform its functions in regard to the coordination and operation of evacuation centers, as specified in Section 2.1.2.11, page B-17 of the State Plan.

Response

NUREG-0654 contains no planning elements relevant to this contention. The responsibility of the Kansas Department of Social and Rehabilitative Services is to coordinate relief activity with the Red Cross and to provide personnel to assist in the operation of registration centers and shelters. It does not require that an agency like this one prove in the Plan that it has staff and equipment to do the function assigned to it. This agency is a State Department and has considerable resources at the State and county level which could be drawn upon during an emergency at Wolf Creek.

Contention 20.(i)

The County Plan is insufficient because it does not contemplate shelter for all of the people to be evacuated from the Emergency Planning Zone. Not enough shelter sites have been specified. (As amended by the Voluntary Dismissal of Contentions, December 5, 1983.)

Response

NUREG-0654, element J.10.a, requires, in part, that plans include maps showing relocation centers in host areas, and shelter areas. The County Plan, Figure 3-6, p. 3-21 shows registration centers but not shelters. The map should be amended to show shelter areas.

The host county Civil Defense Director will designate which shelters will be used, per the County Plan, Appendix J, sec. 2.8, p. J-17. This is appropriate since that person will have the best current information as to the number and composition of the people requiring shelter. Evacuees can be directed to the appropriate shelter from the registration centers.

Contention 20.(j)

There is no provision for the type of services that will be provided at a shelter.

Response

NUREG-0654 does not require a listing of types of services to be provided at shelters.

Contention 20.(k)

There are not enough shelter facilities for 9,000 evacuees at the shelter center. This will require sleeping, food preparation, medical, sanitation, and other facilities if the shelter needs are to be met. The County Plan does not provide details about the extent of the resources required for food, sleeping, safety, health and sanitation, communications, recreation and religious affairs. (As amended by the Voluntary Dismissal of Contentions, December 5, 1983.)

Response

NUREG-0654 does not require the degree of detail about shelter planning that the contention seeks. Once again, the contention envisions a worst case scenario in which the whole of Coffey County would be evacuated. In such case, a state of disaster emergency would surely have been declared by the Governor of Kansas, and the local resources would have been augmented by State and Federal aid. Also, it should be pointed out that evacuating 9,000 people does not necessarily mean sheltering 9,000. Many evacuees may elect to seek shelter elsewhere, such as in hotels and motels and with relative and friends.

Contention 20.(1)

The County Plan does not adequately contemplate a lengthy shelter.

Response

NUREG-0654 does not require evacuation and shelter plans to specifically address every possible contingency. A need for lengthy sheltering would surely reflect a state of serious emergency (e.g., long-term release of radioactivity) and such an emergency would bring State and Federal resources into play to support local efforts.

Contention 20.(m)

There has been no provision made about paying shelter owners for the use of their site or services.

Response

NUREG-0654 does not require such a provision to be in the Plan. It should also be pointed out that shelters may be community buildings (armories, schools, etc.) or buildings owned by institutions other than government (e.g., church owned buildings). The use of such structures might not require payment.

Contention 20.(o)

The County Plan is deficient because the shelters may be downwind from the Wolf Creek Plant site and this could cause additional radiation injuries.

Response

NUREG-0654, element J.10.h., provides that the organization's plans to implement protective measures for the plume exposure pathway shall include: Relocation centers in host areas which are at least 5 miles, and preferable 10 miles, beyond the boundaries of the plume exposure emergency planning zone.

The four registration centers are all more than ten miles beyond the boundaries of the plume exposure emergency planning zone. This puts them and shelters associated with them some 20+ miles from the WCGS. This is a considerable protective buffer between the evacuees and the site of the release and more than fulfills the requirement of NUREG-0654.

Returning to the contention, it should be pointed out that any shelter location is potentially downwind from WCGS because of possible changes in wind direction.

Contention 21.(b)

The County Health Officer has not organized volunteer teams to provide medical care and first aid.

Response

NUREG-0654 has no planning element bearing directly on this contention. The Coffey County Plan, sec. 1.2.7, p. 1-10, states that the County Health Officer will "organize and assign volunteer personnel to medical and first aid teams." It further states that "these teams have been previously established by the Coffey County Hospital emergency plan."

Contention 21.(c)

The Kansas Department of Health is not prepared to provide the primary responsibility for adequate medical emergency services as specified in Figure B-2.

Response

NUREG-0654, in Planning Standard A, requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis. Figure B-2, p. B-22, of the State Plan indicates in its title that it does not apply to Wolf Creek. Figure B-3, p. B-23, addresses Emergency Functions and Assignment for Wolf Creek. Figure B-3 indicates that after a Declaration of a State Disaster Emergency the Department of Health and Environment is responsible for the direction and control of Emergency Medical Services while the County retains support responsibility. Tab L of State Plan, entitled Medical and Public Health Support, provides further information regarding the Department's role. On the basis of the information provided for review, FEMA cannot determine whether the Kansas Department of Health and Environment can do this. However, as a State Agency, this department would be able to draw upon the resources of other State agencies during a radiological emergency.

Contention 22.(a)

The State and Coffey County have not adequately identified local or regional medical facilities which have the capabilities to provide appropriate medical treatment for persons with dangerous radiation exposure or who are contaminated, injured individuals, and they have not made a determination to what extent those facilities can provide such treatment. The plan should set forth the number and location of medical personnel trained in radiation treatment and should specify the arrangements that have been made with medical facilities about the treatment they will provide.

Response

NUREG-0654, element L.3, requires that "each State shall develop lists indicating the location of public, private and military hospitals and other emergency medical services facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contamination personnel, and have facilities and trained personnel able to care for contaminated injured persons."

Contention 22.(a) Cont'd

The State Plan, Table L, pp. L-4 through L-7, does provide such a listing of facilities and their capacities. In Appendix CC there are "draft" letters of agreement between the State of Kansas and Ransom Memorial Hospital and the University of Kansas Medical Center. The letters have not been signed. There are no letters of agreement or memoranda of understanding between the State and these facilities detailing the services the facilities can and will supply in a real radiological emergency. Such letters or memoranda should be obtained for each facility and included in the Plan.

Contention 22.(b)

Coffey County has not arranged for transporting radiologically exposed, radiologically contaminated, or radiologically injured persons to medical support facilities.

Response

NUREG-0654, element L.4, states "each organization shall arrange for transporting victims of radiological accidents to medical support facilities."

Both the State Plan, Tab L, sec. 1.0, p. L-1 and Coffey County Plan, sec. 1.2.7, p. 1-9, stipulate that transportation of victims of radiation shall be by ambulance. But neither Plan contains letters of agreement or memoranda of understanding with the relevant ambulance companies. These should be obtained and included in the plans.

Contention 23.(a)

The County Plan is deficient because it specifies that the County Engineer will be responsible for rescue in the evacuated area, but there is no detailed plan about how he will be able to do this when he has so many other responsibilities.

Response

NUREG-0654, in Planning Standard A, requires that each principal response organization has staff to respond and to augment its initial response on a continuous basis.

In 1.2.5 of the County Plan, pp. 1-7 and 1-8, the duties of the County Engineers are specified. Sec. 1.2.5 (11) states: "Perform rescue service functions (wrecker service for vehicle mishaps) as necessary in Coffey County." It seems from this that the County Engineer is obliged to perform "rescue service" only in the narrowly defined sense of "providing wrecker service for vehicle mishaps". Performing this function would only involve receiving reports of disabled cars, dispatching wreckers, and monitoring completion of wrecker service. This would not seem to constitute the major drain upon the County Engineer's time that the contention envisions.

Contention 24.(a)

The County Plan does not specify in detail the activities that the Emergency Preparedness Coordinator is to perform in connection with evacuation confirmation.

Response

NUREG-0654 does not set forth specific guidelines for evacuation confirmation.

However, the County Plan does give several responsibilities to the Emergency Preparedness Coordinator which are directly related to evacuation confirmation, Section 1.2.3, pp. 1-4, and 1-5. Sec. 1.2.3(4) requires that he/she is to maintain a current master list of persons within the effective 10-mile EPZ requiring individual notification. He/she is to provide such a list for the rural areas of the effective 10-mile EPZ and New Strawn to the County Engineer. Sec. 1.2.3(5) requires that he/she maintain a current list of persons within the effective 10-mile EPZ requiring special evacuation assistance (other than Coffey County Hospital patients or Golden Age Lodge residents). He/she is to provide a copy of this list to the County Engineer. Sec. 1.2.3(13) requires the Emergency Preparedness Coordinator to initiate evacuation and stipulates that evacuation confirmation activities are to be performed by the County Engineer.

Contention 24.(a) Cont'd

These provisions do constitute specifying in detail the activities that the Emergency Preparedness Coordinator is to perform in connection with evacuation confirmation.

Contention 24.(b)

The people needed to handle the evacuation confirmation activities have not been selected. County law enforcement and fire department personnel are not adequate to handle the activity.

Response

NUREG-0654 has no planning element dealing directly with evacuation confirmation.

In Coffey County, CPIP No. 17, Section 17.3.13, it is stated that "once an evacuation has been completed the County Engineer dispatches personnel and vehicles to accomplish evacuation confirmation." The personnel directly under the control of the County Engineer are the employees of the County Engineering Department. Thus, the people needed to handle the confirmation activities have been selected - they are the County Engineer's employees.

Contention 24.(c)

The County Plan does not adequately specify who or how many people will be involved in conducting a house to house search of the evacuated area.

Response

NUREG-0654 has no planning element bearing directly on this contention.

In the response to 24.(b) above, it is pointed out that Coffey County CPIP No. 17, sec. 17.3.13, does specify who will be responsible for evacuation confirmation. It is the personnel of the County Engineering Department under the direction of the County Engineer.

It should be pointed out that the phrase "house to house search of the evacuated area" is not quite accurate. CPIP No. 17, sec. 17.3.13, states that "the personnel performing the evacuation confirmation do so by checking each residence for a white cloth or rag tied to the door knob or mailbox (as directed by an Emergency Broadcast System Announcement) which indicates that the residence is evacuated. The personnel follow the postal routes to ensure complete coverage of the area. If no white cloth is present, the residences are checked for occupants." Thus, the personnel performing evacuation confirmation do not literally search each house. Only those houses are checked for residents which do not display a white cloth or rag.

Contention 24.(c) Cont'd

Turning to the question of how many people will be involved in performing evacuation confirmation, one finds that the current version of the Coffey County Plan does specify this number. In the County Plan, Table 3-5, p. 3-31, there is a statement of the number of "vehicles/persons assumed available" for evacuation confirmation in the ten mile EPZ. The total number required is 31.

Contention 24.(d)

There are no people available to provide evacuation confirmation. The County Plan (Table 3-5) shows 31 are required. The evacuation confirmation time parameters indicate that confirmation will not be completed for up to 10.5 hours. This means that some individuals will not be out before then. The time must be reduced. Therefore, twice as many people are probably required. (As amended by the Voluntary Dismissal of Contentions, December 5, 1983.)

Response

NUREG-0654 has no planning element bearing directly upon this contention.

As has been pointed out above in the Responses to Contentions 24.(b) and 24.(c), there are people available to provide evacuation confirmation. They are the County Engineer's employees.

The present County Plan, Table 3-5, p. 3-31, gives 31 as the number required.

Contention 24.(d) Cont'd

Table 3-5 does show that confirmation times for Burlington, and for the balance of the 10-mile EPZ outside Burlington, New Strawn, and LeRoy, will be 10.5 hours and 10.1 hours, respectively. However, since the County has chosen to perform evacuation confirmation when it is not required to do so, FEMA does not find it appropriate to require a reduction in these times.

Contention 25.(a)

The County Plan is deficient because it does not provide for relocation of the Coffey County Emergency Operations Center in the event that it becomes necessary to evacuate it. It is unlikely that people will want to remain in the Emergency Operations Center when other offices in the Courthouse have radiation levels that are unacceptable.

Response

NUREG-0654, element H-3, states that "each organization shall establish an emergency operations center for use in directing and controlling response functions." NUREG-0654 does not require that plans contain provisions for the relocation of Emergency Operations Centers.

The County Plan, sec. 4.1, states that the County Emergency Operations Center is located in part of the basement of the Coffey County Courthouse. Communications (located in the County Sheriff's Office) and other activities being carried out in the other areas of the courthouse are to be relocated to the County EOC, in the basement, if radiation levels become unacceptable in other parts of the structure. The County EOC area is said to be "totally below grade" and to have a "protection factor" of "6". If this means a "protection factor category" of 6, which should be clarified in the County Plan, then the basement EOC area provides a considerable amount of protection against radiation - over 6 times the minimum amount suggested for a fallout shelter.

Contention 25.(b)

The County Plan is deficient because it does not provide how the emergency response organization will function if the Coffey County Courthouse Center must be evacuated.

Response

NUREG-0654 does not require that plans contain a description of emergency response functioning after evacuation of an EOC, since it does not require provisions for back-up EOCs.

Contention 26.(a)

The public will not respond as anticipated. They may use non-designated evacuation routes. They may not evacuate when directed. They may evacuate earlier than desired. They may not report to shelter centers after leaving Coffey County.

Response

NUREG-0654 has no planning elements bearing directly upon this contention.

It is quite true that the public may not respond as anticipated. They may not evacuate when directed, but the County Plan has provisions for evacuation confirmation. They may evacuate earlier than desired, but this cannot be controlled. They may not report to shelter centers after leaving Coffey County, even though so doing would be in their best interests. This also cannot reasonably be controlled. The purpose of advance planning is to minimize undesired response. It is not clear what problem is posed by people picking up "other persons at other locations."

There is a real problem involved in the possibility of people picking up children at school in that the Plan provides for children to be bused out en masse. The EBS messages will instruct parents not to pick their children up if they attend public schools. There is no way to guarantee that parents will obey the provisions of the EBS messages. Furthermore, the County Plan itself creates a difficulty by stating in Appendix K, sec. 2.9, p. K-7, that children at the

Contention 26.(a) Cont'd

six area private schools will be picked up by their parents prior to evacuation from the effective 10-mile EPZ. This is unacceptable for reasons given in the Response to Contention 14.(b) above. In that same response, a suggestion is made for alleviating the problem.

Contention 27.(a)

Many emergency workers will not respond as they would in a non-nuclear emergency. They will not do so because of a fear of radiation exposure and injury or in order to help friends and family evacuate. They will not report or will stop work after reporting.

Response

NUREG-0654 gives no guidance in dealing with this contention.

Emergency Workers receive training in order to perform their duties correctly. This training will help to allay irrational or hysterical fears of radiation exposure which might keep these workers from performing their assigned tasks. It is not clear what might be done beyond this to secure emergency worker reliability.

Contention 28.(a)

The County Plan does not specifically detail how many dosimeters will be needed and what kind will be used.

Response

NUREG-0654, element K.3.a, states that "each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices."

The Coffey County Plan, sec. 3.9, p. 3-11, states that "the Coffey County emergency workers are equipped with self-reading dosimeters provided by the State. The Radiological Defense Officer is responsible for issuing the dosimeters and thermoluminescent dosimeters (TLDs) to County emergency workers and recording the doses received. KG&E is responsible for providing TLDs to the County Radiological Defense Officer. This implies, but stops short of explicitly stipulating, that the County Radiological Defense Office will provide each Coffey County emergency workers with both a self-reading dosimeter (from the State) and a TLD (from KG&E). Since NUREG-0654 requires each emergency worker to have both kinds of dosimeter, the Plan should be amended to make it clear that this is to be done.

Contention 28.(a) Cont'd

In the Coffey County Plan, Table 4-1, p. 4-6, there is a list of "Radiation Monitoring Equipment." This list includes 214 CDV-742 dosimeters and 200 TLDs. From this supply, 200 emergency workers could be equipped with both self-reading and permanent record dosimeters. However, there is no indication where these are to be maintained or whether the County is actually in possession of them. Returning specifically to the contention, it is not clear that there would be enough to outfit all emergency workers during a serious incident at WCGS. The Plan should contain a breakdown of emergency workers by category, with an estimate of the number required in each category. This would make a rational deduction possible concerning the total number of dosimeters required.

Contention 28.(b)

There are not enough dosimeters for emergency personnel.

Response

NUREG-0654, element K.3.a, states that "each organization shall make provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices."

As mentioned in the Response to 28.(a) above, Table 4-1, p. 4-6, of the Coffey County Plan is a listing of "Radiation Monitoring Equipment." This list includes 214 CDV-742 dosimeters and 200 TLDs. This would be sufficient to outfit 200 emergency workers with both self-reading and permanent record dosimeters. There is no estimate of the total number of emergency workers that might be needed in case of an emergency at Wolf Creek. The question cannot be answered from the material provided for review.

Contention 28.(c)

Even though the Coffey County emergency workers are supposed to have self-reading dosimeters, the State and Coffey County have not made provision for these dosimeters, and the County Plan does not contemplate enough of them to be available for each of the workers.

Response

NUREG-0654, element K.3.1, states that "each organization shall make provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices."

The Coffey County and State Plans do make provisions for self-reading dosimeters to be provided for Coffey County emergency workers. Whether enough of them have been provided for cannot be determined from the materials provided for review.

Contention 28.(d)

There is no plan specified for issuing dosimeters to County emergency workers.

Response

NUREG-0694, element K.3.a, states that "each organization shall make provisions for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices."

In the Coffey County Plan, CPIP No. 27, sec. 27.3.8, it is stated: "After his Radiation Monitoring Team members have arrived, the Radiological Defense Officer issues self-reading dosimeters, TLDs, monitoring equipment and dispatches the Radiation Monitoring Team members to meet KG&E teams to form joint monitoring teams with KG&E initially, and with KG&E and state personnel ultimately. This is at KG&E's Emergency Operations Facility." And, at CPIP No. 27, sec. 27.3.10, it further states that "The Radiological Defense Officer ensures that TLDs and self-reading dosimeters have been issued to emergency workers. The Radiological Defense Officer requests that the Shop Foreman issue dosimeters, TLDs and maintain exposure records for emergency workers dispatched to the controlled area from the County Barn." These two passages do constitute a specific plan for issuing dosimeters to County Emergency Workers.

Contention 28.(e)

The Radiological Defense Officer has not developed a system for controlling radiological exposure of emergency workers.

Response

NUREG-0654, element K.3.b, states that "each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident."

Coffey County CPIP No. 27, sec. 27.3.10, states, in full: "The Radiological Defense Officer ensures that TLDs and self-reading dosimeters have been issued to emergency workers. The Radiological Defense Officer requests that the Shop Foreman issue dosimeters, TLDs and maintain exposure records for emergency workers dispatched to the controlled area from the County Barn. The Radiological Defense Officer maintains records of the doses received by emergency workers during the incident. Self-reading dosimeters, TLDs and Attachment 27-1, "Emergency Radiation Exposure Record" are utilized. Emergency Workers are instructed to check their dosimeters hourly while in the controlled area. The Radiological Defense Officer reads and records the exposure (indicated by the dosimeter) received by emergency workers at the end of each shift. The TLDs are read weekly or at the end of the event, whichever comes first. Upon termination of the incident, these records are forwarded to the County Health Officer."

Contention 28.(e) Cont'd

The provisions of CPIP No. 27, sec. 27.3.10, do constitute a system for controlling radiological exposure of emergency workers.

Contention 28.(f)

The County Plan is deficient because it does not make specific enough details about how the dose received by emergency workers will be recorded and monitored.

Response

NUREG-0654, element K.3.b, states that "each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident."

Coffey County CPIP No. 27, sec. 27.3.10, states, in full: "The Radiological Defense Officer ensures that TLDs and self-reading dosimeters have been issued to emergency workers. The Radiological Defense Officer requests that the Shop Foreman issue dosimeters, TLDs and maintain exposure records for emergency workers dispatched to the controlled area from the County Barn. The Radiological Defense Officer maintains records of the doses received by emergency workers during the incident. Self-reading dosimeters, TLDs and Attachment 27-1, "Emergency Radiation Exposure Record" are utilized. Emergency Workers are instructed to check their dosimeters hourly while in the controlled area. The Radiological Defense Officer reads and records the exposure (indicated by the dosimeter) received by emergency workers at the end of each shift. The TLDs are read weekly or at the end of the event, whichever comes first. Upon termination of the incident, these records are forwarded to the County Health Officer."

Contention 28.(f) Cont'd

The provisions of CPIP No. 27, sec. 27.3.10, do provide specific details about how the doses received by emergency workers will be recorded and monitored.

Contention 29.(a)

There is no adequate arrangement between Coffey County and the State to provide radiological emergency response training for State and local emergency organization personnel.

Response

The requirements for provision of Radiological Emergency Response Training are set out in NUREG-0654, elements 0.1 and 0.4. Each organization is required, under the above criteria, to establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. Therefore, NUREG-0654 does not require an arrangement between Coffey County and the State to provide training.

Coffey County addresses training in the County Plan, sec. 5.0, pp. 5-1 to 5-5, and more specifically, in CPIP No. 28. The County Plan calls for joint development of a training program in sec. 5.0 on page 5-1, and the CPIP at 28.3.4 and 28.3.6 provide specifics for coordination and integration of county training plans with the state and the utility training programs. The State Plan, at sec.1.1, pp. 0-1 through 0-5, sets forth the training responsibilities of the state. While not required by NUREG-0654, the State Plan has also provided at sec. 1.1, page 0-2, that training plans and procedures for the state, county and nuclear facility, be integrated.

Contention 29.(b)

Due to insufficient staffing, Coffey County cannot provide training for personnel in evacuation procedures and other procedures required for personnel to implement an evacuation plan. Although 2 persons are needed to adequately perform the training function, only 1 (the Emergency Planning Coordinator) is presently available.

Response

The requirements for provision of training of appropriate individuals of the offsite response organizations are set forth in element O of NUREG-0654 at pp. 75 through 77. The Coffey County Plan places the responsibility for training, including the evacuation plan, on the Emergency Preparedness Coordinator (the "Emergency Planning Coordinator" referenced in the contention is not a position listed in the county organization), sec. 1.2.3 (2), p. 1-5.

The Plan identifies the above single coordinator with the responsibilities for training. However, in sec. 5.1, the Plan does reference use of some existing FEMA courses and letters of agreement with K.G. & E to augment county resources.

Training for those appropriate individuals necessary to implement the evacuation procedures described both in sec. 3.3. and elsewhere in the County Plan are found in County CPIP No. 28. Under the procedures in County CPIP No. 28, training plans for the organizations and individuals within the emergency response organization are required.

Contention 29.(b) Cont'd

A training matrix, (Table 5-1), CPIP No. 28, Attachment 28-1, portrays individuals and organizations to receive training. Under this procedure, training is provided to those appropriate individuals responsible for implementing the evacuation plan.

The resources provided for in the plan appear adequate to provide the training specified in CPIP No. 28 and the County Plan, and meets the requirement of NUREG-0654.

Contention 29.(c)

The Coffey County Emergency Preparedness Coordinator has not developed the training programs needed to implement the County Plan, and has not made adequate plans to familiarize Coffey County personnel with the plan and their responsibilities.

Response

The requirements for provision of training are found in NUREG-0654, elements 0.1. and 0.4. The Coffey County Plan, at sec. 5.1, p. 5-1, references the joint development, with the State of Kansas and KG&E, of a training program. Key aspects of the training program are provided in the County Plan at sec. 5.0, p. 5-1, and in CPIP No. 28. The County Plan states that "Lesson Plans for eight areas of interest are developed" (sec. 5.1, p. 5-1). In addition, training plans are called for in CPIP No. 28 that are designed for specific individual training.

Initial training to familiarize the Coffey County personnel with the plan and their responsibilities is called for prior to the first integrated emergency response exercise scheduled at the Wolf Creek Generating Station, CPIP No. 28.3.8. Annual training is to follow this initial training.

FEMA finds that the County Plan does meet the requirements specified for development of training plans. FEMA has not reviewed the individual training plans that are designed to "familiarize" the response personnel and at this time

Contention 29.(c) Cont'd

cannot warrant their adequacy. However, the scope of training provided in the County Plan's Table 5-1, p. 5-5, for response personnel addresses the major roles where training is needed for each major group or individual.

Contention 29.(d)

The County Plan does not contemplate training as many individuals as will actually be needed if the plan is to be implemented.

Response

The requirement for provision of training for individuals identified or assigned responsibilities is found in of NUREG-0654, elements 0.1 and 0.4. The County Plan, Table 5-1, p. 5-5, identifies training for 66 key individuals and groups responsible for implementing the County Plan.

Training is provided for all of those groups and individuals identified in the plan as necessary response personnel. However, FEMA, later in this document, provides additional groups and individuals it believes need additional training. (See Contentions Nos. 29.(h) 10, 11, 12, 13, 24.)

Contention 29.(e)

There is no provision in the County Plan to indicate who will actually do the teaching.

Response

The requirements for provision of training related to a response to a Radiological Emergency are set out in NUREG-0654, element 0.4. These requirements do not require identification of teachers. The County Plan, sec. 1.2.3, assigns the responsibility for training county personnel to the Emergency Preparedness Coordinator. As stated above, actual "teachers" are not required to be identified. However, the County Plan, sec. 5.1, references use of FEMA courses for shelter systems training.

The County Plan also requires, in sec. 1.2.10(2), a Radiological Defense Officer to assist in training of radiation monitoring personnel and host county radiation monitoring personnel.

Further training of Coffey County personnel or volunteer organizations (fire and ambulance) for offsite response at WCGS is the responsibility of KG&E, County Plan, sec. 5.0, p. 5-2.

The County Plan assigns the responsibility for training and the development and implementation of training programs to the Emergency Preparedness Coordinator. This is consistent with NUREG-0654, which calls for the state and

Contention 29.(e) Cont'd

local governments to develop the capability and resources to conduct training for their staff. Resources and assistance are available at the licensee, state and Federal governments to assist the county if a need exists.

Contention 29.(f)

The key personnel within the Coffey County government who occupy positions in the emergency response organization are not aware enough of their duties under the plan. There must be some assurance in the County training program that the Emergency Preparedness Coordinator knows that the individuals understand their responsibilities and that they are adequately trained.

Response

The requirements for provision of training of appropriate individuals is set out in NUREG-0654, elements 0.1 and 0.4.

See response to Contention 29.(c).

Contention 29.(g)

The County Plan should specify in detail the type and amount of training that individuals will receive. The training to be provided to the positions listed in Table 5-1 should be specified in detail.

Response

The requirements for provision of training related to a response to a radiological emergency are set out in NUREG-0654, element 0.4. Under this requirement, specialized initial training and periodic retraining programs (including the scope, nature and frequency) shall be provided by the county. Exact guidelines on details and amount of training are not specified in NUREG-0654.

The County Plan does provide for initial and periodic (annual) training of individuals (sec. 5.1, p. 5-1).

Details on the type and amount of training are not contained in the plan. This information should be part of the training programs and lesson plans developed, but are not required by NUREG-0654.

Contentions 29.(h) (1-26)

The following local personnel lack sufficient training to perform their assigned functions and should be trained in the identified areas:

Contention 29.(h) 1

The Coffey County Emergency Preparedness Coordinator. Advice to Sheriff about protective action to take; locating, storing, and distribution of emergency equipment; training personnel about evacuation duties and emergency equipment; have knowledge about radiation monitoring, decontamination processes, and use of protective gear; understanding duties of each person involved in the plan; conducting evacuation drills; training public about how to respond to an emergency; evacuation of people who lack transportation; implementing the guidelines to be used to determine when emergency workers should conduct activities that will result in exposures in excess of 25 REM.

Response

The requirements for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each

Contention 29.(h) 1 Cont'd

organization establish a training program for instruction and qualifying personnel who will implement the plans. Specialized initial and periodic training is required.

The County Plan, at sec. 1.2.1(2), p. 1-2, provides for the training of the Emergency Preparedness Coordinator. The County Plan identifies, at sec. 5.0, Table 5-1, four areas of training for the Emergency Preparedness Coordinator: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts, 3) Overview of the Three Emergency Response Plans; and 4) The Position and Role in the Coffey County Emergency Plan.

Initial training and annual training for the Coffey County Emergency Preparedness Coordinator is provided in the County Plan at sec. 5.1, p. 5-1.

FEMA's review finds that the County Plan contains provisions, consistent with those in NUREG-0654, for training of the Coffey County Emergency Preparedness Coordinator, in support of the responsibilities described in the County Plan.

Contention 29.(h) 2

Coffey County Commissioners.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns responsibilities to the Coffey County Commissioners at sec. 1.2.1., with a summary at Table 1-1. Training in support of these responsibilities is described in the County Plan, sec. 5.0., Table 5-1, and in CPIP No. 28. Four areas of training for Coffey County Commissioners are provided: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; and 4) Position and Role in the Coffey County Emergency Plan.

The County Plan also specifies initial training and annual training for Coffey County Commissioners at Section 5.1, page 5-1.

Contention 29.(h) 2 Cont'd

FEMA's review finds that the County Plan contains provisions for training of the Coffey County Commissioners in support of their responsibilities described in the County Plan. •

Contention 29.(h) 3

Coffey County Clerk.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns the County Clerk the role of Public Information Officer at sec. 1.2.4., p. 1-6, with a summary at Table 1-1. Training in support of those responsibilities is described in the County Plan, sec. 5.0, Table 5-1, and in CPIP No. 28. Five areas of training for the Public Information Officer (County Clerk) are provided: 1) Basic Radiation Effects and Protection, 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; 4) Self-Protection Radiation Monitoring, and 5) Position and Role in Coffey County Emergency Plan.

The County Plan also specifies initial training and annual training for the Public Information Officer (County Clerk) at sec. 5.1, p. 5-1.

Contention 29.(h) 3 Cont'd

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training of the Coffey County Public Information Officer (County Clerk) in support of the responsibilities described in the County Plan.

Contention 29.(h) 4

Coffey County Sheriff. Coordination of evacuation process; knowledge of plan to advise people about duties and how to implement their duties; training of personnel to conduct evacuation; conduct of evacuation plan drills; notification of radiological emergency; management of roadblocks and traffic control; security of evacuated area; evacuation of persons without transportation.

Response

The requirements for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns responsibilities of the Coffey County Sheriff at sec. 1.2.2, p. 1-3, with a summary at Table 1-1, p. 1-16. Training in support of those responsibilities is described in the County Plan, sec. 5.0, Table 5-1, and in CPIP No. 28. Four areas of training for the Coffey County Sheriff are provided in Table 5-1: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; and 4) Position and Role in Coffey County Emergency Plan.

Contention 29.(h) 4 Cont'd

Additional unspecified training for the County Sheriff in the format of individual training plans is provided at CPIP No. 28.3.1. FEMA has not reviewed these individual training plans. The County Plan also specifies initial training and annual training for the County Sheriff at sec. 5.1, p. 5-1.

FEMA's review of the information available in the County Plan finds that the Plan's provisions are consistent with those in NUREG-0654 for training of the Coffey County Sheriff in support of the responsibilities described in the County Plan.

FEMA does not concur with the contention's description of the sheriff's responsibilities. The County Plan, at sec. 1.2.1, pp. 1-3 and 1-4, lists eleven responsibilities. They do not include:

1. Coordination of the evacuation process,
2. Training of personnel to conduct evacuations,
3. Conduct of evacuation plan drills.

Contention 29.(h) 5

Coffey County Sheriff's Department personnel.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element O.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns responsibilities to the Coffey County Sheriff's Office at sec. 1.2.2, pp. 1-3 and 1-4, with a summary at Table 1-1, p. 1-16. Training in support of these responsibilities is described in the County Plan, sec. 5.0, Table 5-1, and in CPIP No. 28. Four areas of training for the Coffey County Sheriff's Office (Department) are provided in Table 5-1: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in Coffey County Emergency Plan.

The County Plan also specifies initial training and annual training for the Coffey County Sheriff's Office at sec. 5.1, p. 5-1.

Contention 29.(h) 5 Cont'd

FEMA's review finds that the County Plan contains provisions, consistent with those in NUREG-0654, for training of the Coffey County Sheriff's Office in support of the responsibilities described in the County Plan.

Contention 29.(h) 6

Coffey County Engineer. Cleaning and maintaining of roads in bad weather; operation of roadblocks and traffic control.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns the Coffey County Engineer responsibilities at sec. 1.2.5, pp. 1-7 and 1-8, with a summary at Table 1-1. Training in support of these responsibilities is described in the County Plan, sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Four areas of training for the County Engineer (and his staff) are provided at Table 5-1: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in Coffey County Emergency Plan.

Contention 29.(h) 6 Cont'd

In addition to the above training, the County Plan identifies an individual training plan for the County Engineer (and staff) at CPIP No. 28.3.1. FEMA has not reviewed the individual training plan. The County Plan also specifies initial training and annual training for the County Engineer and staff at sec. 5.1, p. 5.1.

FEMA's review of the information available in the County Plan finds that the Plan's provisions are consistent with those in NUREG-0654 for training of the Coffey County Engineer (and staff) in support of their responsibilities as described in the County Plan.

The contention's concern for training of the County Engineer in specific cleaning and maintaining of roads in bad weather, operation of road blocks, and traffic control, is not supportable. The County Plan provides guidance on road block locations and traffic control positions at CPIP No. 17. Guidance for actions in poor weather conditions is also provided at CPIP No. 17.3.6, 17.3.7, 17.3.8 and 17.3.9. Further, cleaning and maintaining roads, operation of roadblocks, and traffic control are routine duties for the County Engineer's staff and do not requiring special training. FEMA finds that the County Plan identifies training for the County Engineer (and staff) position and role in the plan, and that the County Plan sets forth procedures for action by the County Engineer that satisfy those raised in the contention.

Contention 29.(h) 7

Coffey County Engineer's staff. Rescue functions.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element O.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The County Plan assigns the Coffey County Engineer rescue responsibilities at sec. 1.2.5(11), pp. 1-7 and 1-8, with a summary at Table 1-1. Training in support of these responsibilities is described in the County Plan, sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Four areas of training for the County Engineer (and his staff) are provided at Table 5-1: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in Coffey County Emergency Plan.

Contention 29.(h) 7 Cont'd

In addition to the above training, the County Plan identifies an individual training plan for the County Engineer (and staff) at CPIP No. 28.3.1, FEMA has not reviewed the individual training plan. The County Plan also specifies initial training and annual training for the County Engineer and staff at sec. 5.1, p. 5-1.

FEMA's review of the information available in the County Plan finds that the Plan's provisions are consistent with those in NUREG-0654 for training of the Coffey County Engineer (and staff) in support of the responsibilities (rescue functions) described in the County Plan.

The County Plan provides for training of the Engineer's staff, as cited above. Rescue functions such as picking up persons who call in stating they have no transportation out of the area to be evacuated (County Plan, sec. 3.5, p. 3-8, and at CPIP No. 17.3.12) are a responsibility of the County Engineer and staff. Training is provided at CPIP No. 28.3.1 and Table 5-1, sec. 5.0, of the County Plan for their position and role in the County Plan.

Contention 29.(h) 8

Personnel of the Coffey County Road Department. Management and assistance at roadblocks.

Response

This requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.a. NUREG-0654 does not specify the actual training requirements, but states that each organization establish a training program for instructing and qualifying personnel who will implement the plan. Specialized initial and periodic training is required.

The Coffey County Road Department is in the County Plan, part of the County Engineer's Personnel. The County Plan assigns the Coffey County Engineer and staff (including the Road Department) responsibilities at sec. 1.2.5 (3), pp. 1-7 and 1-8, with a summary at Table 1-1. Training in support of these responsibilities is described in the County Plan, sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Four areas of training for the County Engineer and his staff are provided at Table 5-1, p. 5-5: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in Coffey County Emergency Plan.

Contention 29.(h) 8 Cont'd

In addition to the above training, the County Plan identifies an individual training plan for the County Engineer and staff at CPIP No. 28.3.1. FEMA has not reviewed the individual training plan. The County Plan also specifies initial training and annual training for the County Engineer and staff at sec. 5.1, p. 5-1.

FEMA's review of the information available in the County Plan finds that the Plan's provisions are consistent with those in NUREG-0654 for training of the Coffey County Engineer (and staff), in support of the responsibilities as described in the County Plan.

The County Plan calls for utilization of the "Road and Bridge Crew" of the County Engineer's staff to assist in setting up roadblocks. The County Plan, at sec. 3.6.1, pp. 3-8 and 3-9, and CPIP Nos. 17.3.10 and 17.3.11, provides for County Engineer personnel to establish barricades for the secondary roads. The secondary roadblocks are unmanned.

Training in support of the responsibilities is described in the County Plan at sec. 5.0, Table 5-1, and in CPIP No. 28.

The Plan calls for training of County Engineer personnel in their position and role in the Coffey County Emergency Plan.

Contention 29.(h) 8 Cont'd

The County Plan also provides for initial and annual retraining of the County Engineer's office personnel at CPIP No. 28.3.8. In addition, individual training plans are developed for the County Engineer and his staff, as set forth at CPIP No. 28.3.1. FEMA has not reviewed the individual training plans.

FEMA finds that training programs have been developed for the personnel of the County Engineer's office, including the Road and Bridge Crew, that address their responsibilities under the response plan.

Contention 29.(h) 9

The Burlington City Police Department and other police departments within Coffey County. Giving of initial warnings; security of area after evacuation; traffic control, and management of roadblocks.

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element O-4.a. The County Plan, in sec. 1.0, Table 1-1, p. 1-16, assigns support responsibilities to the Burlington City Police and other departments within Coffey County. Four areas are identified where support functions are assigned: 1) Evacuation; 2) Control of Evacuation Routes; 3) Security; and (4) Reentry Operations.

The County Plan does not detail any responsibilities for the city police departments in the Plan. The above police departments are not listed in the County Plan's training Table 5-1, p. 5-5.

The assignments listed under County Plan for the city police departments are routine duties in which police department personnel are trained. Further, the County Plan organizationally places the local law enforcement agencies under command and control of the County Sheriff's Office at Figure 1-1, p. 1-14. The County Sheriff's Office is provided training as specified in our Response

Contention 29.(h) 9 Cont'd

above to contention Nos. 29(h) 4 and 5. Thus, the local police departments, as a support group to the County Sheriff's Office, would receive training for their support role.

Contention 29.(h) 10

Personnel of the City of Burlington Fire Department and the personnel of other fire departments within Coffey County. Decontamination process at roadblocks and checkpoints; use of protective gear during the evacuation process.

Response

The requirements for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.d. The training for the Fire Leader and fire fighting personnel is provided in the CPIP No. 28.3.1. The Burlington Fire Department is in the County Plan under the command and control of the Fire Leader at Figure 1-1, p. 1-14. Therefore, training would be provided to those personnel in Burlington and other fire departments responsible under the Fire Leader.

The County Plan does require action of Fire Leader personnel in decontamination, at CPIP 19.3.6, and the County Plan, sec. 1.2.6(4), for vehicles at designated access control points.

The County Plan also requires Fire Leader personnel to notify persons in Burlington and Le Roy, who are unable to hear the sirens or tone alert radios due to deafness or other reasons, at County Plan, sec. 1.2.6(1).

Contention 29.(h) 10 Cont'd

Training in Basic Radiation Effects and Protection is listed as "available but not mandatory" for the Fire Leader and personnel. However, FEMA believes it should be mandatory that the Fire Leader and personnel should receive training in Basic Radiation Protection. The Fire Leader and any personnel who may be exposed to the effects of radiation in evacuation or decontamination should also receive training in Self-Protection Radiation Monitoring.

Contention 29.(h) 11

Traffic control personnel.

Response

The requirement of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.d. The County Plan assigns the primary responsibility for traffic control during an evacuation to the County Sheriff at sec. 1.0, Table 1-1, p. 1-16. The support functions are assigned to the Sheriff's Office, other law enforcement agencies and the Coffey County Engineer's Office.

Training plans in support of the above referenced personnel, who will perform the traffic control role in the plan, are given. (See CPIP No. 28.3.1 and Attachment 28-1, p. 1 of 1. See also responses to Contentions 29.(h) 4, 5, 6 and 7). FEMA believes that training on Basic Radiation Effects and Protection should be mandatory for all traffic control personnel. The plan provides that training for those in the County Sheriff's and County Engineer's Office. However, it does not address this type of training for the other law enforcement agencies assigned a traffic control support role in the County Plan.

Contention 29.(h) 12

Coffey County Health Officer

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element 0.4.h. The County Plan assigns responsibilities to the Coffey County Health Officer at sec. 1.2.7 (1), p. 1-10, with a summary at Table 1-1, p. 1-16. Training in support of those responsibilities is detailed in the County Plan, sec. 5.0, Table 5-1, and in CPIP No. 28. Two areas of training are provided: 1) Overview of the Three Emergency Plans, and 2) Position and Role in the Coffey County Emergency Plan. Training in Basic Radiation Effects and Protection is available, but not mandatory. However, FEMA believes that it should be mandatory that the Coffey County Health Officer receive training in Basic Radiation Protection.

Initial training and annual training for the Coffey County Health Officer is provided in the County Plan at sec. 5.1, p. 5-1.

With the exception cited above concerning the Basic Radiation Effects and Protection, FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training of the Coffey County Health Officer in support of the responsibilities as described in the County Plan.

Contention 29.(h) 13

Volunteer Teams to provide medical care and first aid (to be trained by the County Health Officer).

Response

The requirement for provision of training for those response officials to a radiological emergency are set out in NUREG-0654, element O.4.h. The County Plan assigns the County Health Officer, at sec. 1.2.7(1), p. 1-10, the responsibility for organizing and assigning volunteer personnel to medical and first aid teams. These teams have been previously established by the Coffey County Hospital Emergency Plan. The County Health Officer does not train these personnel, as stated in the contention.

While the plan does not specify the responsibilities of the volunteer teams for medical care and first aid or discuss their training, they are part of the Health and Management Team. (See County Plan, sec. 1.1, page 1-2.) The Health and Medical Management Team is provided training in the County Plan at sec. 5.0, Table 5-1. The training is in two areas: 1) Overview of the Three Emergency Plans, and 2) Position and Role in the Coffey County Emergency Plan. Further training in Basic Radiation Effects and Protection is available, but not mandatory. However FEMA believes that training in Basic Radiation Effects should be mandatory for the volunteer teams that are to provide support roles in medical care and first aid.

Contention 29.(h) 13 Cont'd

The areas of responsibilities of the volunteers to provide support in medical care and first aid are of a routine nature. Coffey County Hospital can provide on the job training as necessary for these volunteers.

Contention 29.(h) 14

Coffey County Health Nurse

Response

The County Plan assigns responsibilities to the Coffey County Health Nurse at sec. 1.2.7(1), page 1-9. Training in support of those responsibilities is described in the County Plan, sec. 5.0, Table 5-1, and in CPIP No. 28. Three areas of training are provided: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; and 3) Position and Role in the Coffey County Emergency Plan.

The County Plan provides for initial and annual retraining of the Coffey County Health Nurse in sec. 5.1, p. 5-1.

FEMA's review finds that the County Plan contains provisions, consistent with those in NUREG-0654, for training of the Coffey County Health Nurse in support of the responsibilities as described in the County Plan.

Contention 29.(h) 15

Nursing Home Administrators and Staff

Response

The requirements for provision of training are found in NUREG-0654, element 0.1. and 0.4. The County Plan assigns the responsibility for arranging emergency transportation and alternate facilities for the patients of the Coffey County Hospital and the Golden Age Lodge at sec. 1.2.7(d), p. 1-9, and sec. 3.3.2, p. 3-6. to the Health and Medical Management Team and, specifically, to the Administrator of the Coffey County Hospital.

Training is provided to the Health and Medical Management Team in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Two specific areas of training are identified: 1) Overview of the Three Emergency Plans, and 2) Position and Role in the Coffey County Emergency Plan. Training in Basic Radiation Effects and Protection is also available, but not mandatory. However, FEMA believes that training in the Basic Radiation Effects should be mandatory for the Health and Medical Management Team.

Training is also provided to the Hospital and Nursing Home personnel in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Two specific areas are identified in Table 5-1: 1) Medical Treatment of Radiation Exposed Personnel, and 2) Position and Role in the Coffey County Emergency Plan.

Contention 29.(h) 15 Cont'd

Training is also available in Basic Radiation Effects and Protection, but is not mandatory. However, FEMA believes that training in the Basic Radiation Effects should be mandatory for the Nursing Home Administrators and staff.

The Health and Medical Management Team and the Hospital/Nursing home personnel training is to occur initially and annually, as set forth in the County Plan, sec. 5.0, p. 5-1.

FEMA's review finds that the County Plan contains provisions, consistent with those in NUREG-0654, for training nursing home administrators and staff in support of their responsibilities as described in the County Plan, with the exception noted above concerning training in Basic Radiation Effects.

Contention 29.(h) 16

Coffey County Hospital staff. Evacuation of patients at hospital.

Response

The requirements for provision of training for personnel responsible for support in Radiological Emergency Preparedness Plans are found in NUREG-0654, elements 0.4.f., 0.4.g., 0.4.h. The County Plan assigns the responsibility for evacuation of patients at the Coffey County Hospital to the Health and Medical Management Team Leader at CPIP No. 21.3.6. The Team Leader has the resources of the Team (which is to report to the Coffey County Hospital in the event of an emergency, and is so notified, as provided at CPIP No. 21.3.3), and the Coffey County Hospital staff.

Training is provided to the Health and Medical Management Team and to the Coffey County Hospital staff in the County Plan at sec. 5.0, Table 5-1, p. 5-5. Two specific areas of training are identified for the Coffey County Hospital staff: 1) Medical Treatment of Radiation Exposed Personnel, and 2) Position and Role in the Coffey County Emergency Plan.

Training of both the Health and Medical Management Team and the Coffey County Hospital staff is to occur initially and annually as set forth in the County Plan at sec. 5.0, p. 5-1.

Contention 29.(h) 16 Cont'd

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training the Coffey County Hospital Staff in support of their responsibilities, as described in the County Plan.

Contention 29.(h) 17

Coffey County Ambulance Service. Evacuation of patients at hospital and coordination of that duty with treatment of individuals injured in an emergency.

Response

The requirements for provision of training for personnel responsible for support in Radiological Emergency Preparedness Plans are found in NUREG-0654, elements 0.4.f., 0.4.g., and 0.4.h. The County Plan assigns a support role in any evacuation to the Coffey County Ambulance Service in the County Plan at sec. 5.0, Table 5-1, p. 1-16. Overall responsibility, command and control is assigned to the County Sheriff. The Health and Medical Management Team which, in the event of an emergency would locate itself at the Coffey County Hospital, is responsible for obtaining the transportation and alternate facilities for the patients and residents of the hospital. (County Plan, sec. 3.3.2, p. 3-6).

Training is provided to the Coffey County Ambulance Service in the County Plan at sec. 5.0, Table 5-1, p. 1-16. Two specific areas of training are identified: 1) Medical Treatment of Radiation Exposed Personnel, and 2) Position and Role in the Coffey County Emergency Plan.

Contention 29.(h) 17 Cont'd

The County Plan provides for initial and annual training of the Coffey County Ambulance Service at sec 5.0, p. 5-1. In addressing the contentions specific interest in the coordination function, it should be remembered that the Coffey County Ambulance Service is part of the Health and Medical Management Team's resources. FEMA finds that training is provided in support of the Team's primary responsibility in Emergency Medical Services, and its support role in evacuation, at CPIP No. 28.3.1.

Contention 29.(h) 18

Radiological Defense Officer

Response

The requirements for provision of training for personnel responsible for radiological monitoring are found in NUREG-0654, elements 0.4.a., 0.4.b., and 0.4.c. The County Plan assigns the Radiological Defense Officer Responsibilities at sec. 1.2.10, p. 1-10, with a summary at Table 1-1, p. 1-16.

Training is provided to the Coffey County Radiological Defense Officer in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Six specific areas of training are identified: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; 4) Self-Protection Radiation Monitoring; 5) Radiation Survey Instrumentation; and 6) Position and Role in the Coffey County Emergency Plan.

Training is also provided in the County Plan for the Radiological Defense Officer both initially and then annually at Section 5.0, p. 5-1.

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training the Coffey County Radiological Defense Officer in support of the responsibilities as described in the County Plan.

Contention 29.(h) 19

Coffey County Radiological Monitoring Team. Taking an evaluation of radiation levels; operation of radiological monitoring equipment; knowledge about allowable radiation dosages; use of protective gear.

Response

The requirements for provision of training for personnel responsible for radiological monitoring are found in NUREG-0654, elements 0.4.a., 0.4.b., and 0.4.c. The County Plan assigns the Radiological Monitoring Team responsibilities at sec. 1.0, Table 1-1, p. 1-16. The team is under the direction of the Radiological Defense Officer.

Training is provided to the Coffey County Radiological Monitoring Team in the County Plan at sec. 1.2.10(1), and 1.2.10(2), p. 1-10, sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Six specific areas of training are identified: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; 4) Self-Protection Radiation Monitoring, 5) Radiation Survey Instrumentation; and 6) Position and Role in the Coffey County Emergency Plan.

The County Plan further specifies that the Coffey County Radiological Defense Officer shall assist in training the Radiation Monitoring Team at sec. 1.2.10(1) and 1.2.10(2), pp. 1-10 and 1-11.

Contention 29.(h) 19 Cont'd

Initial and annual training is provided in the County Plan for the Radiological Monitoring Team at sec. 5.0, p. 5-1. Training measures for the specific issues in the contention, i.e., evaluation of radiation levels; operation of radiological monitoring equipment; knowledge about allowable radiation dosages; and the use of protective gear are all covered in the courses described above.

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training the Coffey County Radiological Monitoring Team in support of their responsibilities, as described in the County Plan.

Contention 29.(h) 20

Personnel Assisting the Radiation Monitoring Team with radiation monitoring checks.

Response

The requirements for provision of training for personnel responsible for radiological monitoring are found in NUREG-0654, elements 0.4.a., 0.4.b., and 0.4.c. The Coffey County Plan assigns the Coffey County Radiological Defense Officer with the responsibility for recruitment and training of volunteers for a 14 member Radiation Monitoring Team and other personnel for host county radiation monitoring at sec. 1.2.10(1) and 1.2.10(2).

Training is also specified in the County Plan for Host County Radiation Monitors and access control roadblock radiation monitors at sec. 5.1, Table 5-1, p. 5-5. Four specific areas of training are identified: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in the Coffey County Emergency Plan.

The County Plan at sec. 3.10, p. 3-12, calls for the formation of Joint Radiation Monitoring Teams. These Joint Teams are to consist of members of the Coffey County Radiation Monitoring Team and specially trained members from the State of Kansas and the KG&E. The State and KG&E Team members are trained by the State. (County Plan, sec. 3.10, p. 3-12.)

Contention 29.(h) 20 Cont'd

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training those personnel under county control (including the host county personnel) in support of their role and responsibilities as described in the County Plan. Other personnel described above to assist in a radiation monitoring role are State of Kansas employees or KG&E employees and would receive training through their own respective organizations.

Contention 29.(h) 21

Shelter Leader

Response

The requirements for provision of training for personnel responsible for implementing radiological emergency response plans are found in NUREG-0654, element 0.4. The County Plan assigns the shelter systems officer responsibilities at sec. 1.2.8, p. 1-10, with a summary at Table 1-1, p. 1-16. Individual shelter managers are also provided for in the host counties where evacuees are to proceed, if necessary, to be sheltered. It is not clear if the contention is addressing the Shelter Systems Officer's or the shelter manager's training, since the term "Shelter Leader" is not identified in the County Plan in Organization sec. 1.0. However, training for both of the above persons is provided in the County Plan.

Training is provided to both the Coffey Shelter Systems Officer and the Host County Shelter Managers in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Four areas of training are identified: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in the Coffey County Emergency Plan.

The County Plan also specifies initial and annual training for those shelter management personnel listed above at sec. 5.0, p. 5-1.

Contention 29.(h) 21 Cont'd

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for the Coffey County Shelter Officer and the Host County Shelter Managers in support of their responsibilities, as described in the County Plan.

Contention 29.(h) 22

Temporary Shelter Managers

Response

The requirements for provision of training of personnel responsible for support in a radiological emergency plan are found in NUREG-0654, element 0.4. NUREG-0654 does not require temporary shelter managers. The Coffey County Plan does not identify Temporary Shelter Managers nor are they required to. Therefore, training for this position is not required.

The County Plan and Host County plans do identify a Shelter Systems Officer and shelter managers, respectively. The Coffey County Plan has provisions for training of the .

Shelter Systems Officer position at sec. 5.0, Table 5-1 p. 5-5. The County Plan and Host County plan's have provisions for training shelter managers (See County Plan sec. 5.0, Table 5-1, p. 5-5, and Appendix J for Host Plan training, sec. 2.7(b) for four host counties).

Contention 29.(h) 23

Shelter Managers and Shelter staff.

Response

The requirements for provision of training for personnel responsible for implementing radiological emergency response plans are found in NUREG-0654, element 0.4. The County Plan assigns the Shelter Systems Officer with overall responsibilities at sec. 1.2.8, p. 1-10, with a summary at Table 1-1, p. 1-16. Individual shelter managers are also provided in the County Plan for the host counties where evacuees are to proceed if necessary to be sheltered.

Training is provided to both the Coffey Shelter Systems Officer and the Host County shelter managers in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28. Four areas of training are identified: 1) Basic Radiation Effects and Protection, 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring, and 4) Position and Role in the Coffey County Emergency Plan.

The County Plan also specifies initial and annual training for those shelter management personnel listed above at sec. 5.0, p. 5-1.

FEMA's review finds that the County Plan contains provisions consistent with those in NUREG-0654 for training for the Host County shelter managers in support of their responsibilities as described in the County Plan.

Contention 29.(h) 24

Bus Drivers. About their duties and to assure that they will respond.

Response

The requirements for provision of training of personnel responsible for support in implementing radiological emergency management plans are found in NUREG-0654, element 0.4. The County Plan calls for the use of school bus drivers for evacuation transportation, under the County Engineer's command and control at sec. 1.2.5 (2), p. 1-7.

Training is provided to the bus drivers in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in the CPIP No. 28. Two specific areas of training are identified: 1) Overview of the Three Emergency Plans, and 2) Position and Role in the Emergency Plan. FEMA believes that training in Basic Radiation Effects and Self-Protection Radiation Monitoring should be mandatory for school bus drivers assigned roles in evacuation.

The County Plan also provides for initial and annual training for school bus drivers at sec. 5.0, p. 5-1.

FEMA's review finds that training is provided. The contention's interest in ensuring that the bus drivers will respond is noted. However, FEMA has no way of ensuring that any person will "respond". FEMA can and will test and exercise the plan and evaluate the results.

Contention 29.(h) 25

Personnel to perform confirmation of evacuation.

Response

The requirements for provision of training of personnel, such as those with a role in evacuation, responsible for support in implementing a radiological emergency plan are found in NUREG-0654, element 0.4. The Coffey County Plan assigns the responsibility for initiation and confirmation of evacuation activities to the Emergency Preparedness Coordinator and the actual conducting of the activities to the County Engineer at sec. 1.2.3 (13), p. 1-5, and at Section 1.2.5 (12), p. 1-8, and in a summary table at sec. 1.0, Table 1-1, p. 1-16.

Training is provided to both the County Emergency Preparedness Coordinator and to the County Engineer and his staff in the County Plan at sec. 5.0, Table 5-1, p. 5-5, and in CPIP No. 28, Attachment 28-1. Four areas of training are provided in the County Plan for the County Engineer and staff, in support of their responsibilities at CPIP No. 28, Attachment 28-1: 1) Basic Radiation Effects and Protection; 2) Self-Protection Radiation Monitoring; and 3) Position and Role in the Coffey County Emergency Plan.

Contention 29.(h) 25 Cont'd

The training provided above addresses the responsibilities of the County Engineer and his staff in carrying out the specific evacuation confirmation procedures explained in CPIP No. 17 at 17.3.14, p. 5 of 14. The County Plan also provides for initial and annual training for those personnel listed above at sec. 5.0, p. 5-1.

Contention 29.(h) 26

Volunteers and other personnel yet to be recruited who will have responsibilities under the plan.

Response

The requirements for provision of training of personnel responsible for support in a radiological emergency plan, are found at NUREG-0654, elements 0.1. and 0.4. However, training of volunteers is not specifically addressed in NUREG-0654.

The Coffey County Plan assigns volunteers roles in the Emergency Response Organization at sec. 1.1, p. 1-1; the Health and Medical Management Team at sec. 1.2.7, see County Health Officer, p. 1-10; the Radiological Defense Officer's Radiological Monitoring Teams at sec. 1.2.10, p. 1-10. Additional volunteer and "other personnel" are provided in the County Plan's Host County Shelter Plans (four) in Attachment J in the individual Host County Shelter Plans, secs. 2.4 (c), 2.5 (a), 2.6 (a through f), 2.7 (b and c), and 2.8 (a).

Overall training responsibility, which includes training for volunteers, is provided in the County Plan at sec. 1.2.3 (2) through the Emergency Preparedness Coordinator. The Health and Medical Management Team is provided training at CPIP No. 28, Attachment 29-1. Reference to specific training of volunteers is not provided here.

Contention 29.(h) 26 Cont'd

The County Plan does provide training to the Radiation monitoring team volunteers at sec. 1.2.10 (2).

Also, training is identified for the Host County radiation monitors, Reception and Care Coordinator and staff in the Host County Shelter Plans, Appendix J, sec. 7.0. Further, training for the Coffey County personnel or volunteer organizations (fire and ambulance) for an onsite response at the WCGS is the responsibility of the WCGS (See sec. 5.1, p. 5-2 of the County Plan.)

FEMA finds that while the Plan calls for use of volunteers and other personnel to serve support roles in the Plan, the volunteers and other persons are under the command and control of a recognized element in the Plan that is in the training program. Further, specific training for volunteers is provided for, as discussed above, with the exception of the Health and Medical Management Team volunteers.

Contention 29.(i)

The County Plan is deficient because the training of emergency workers about the effects of large doses of radiation is not specified in the plan.

Response

The requirements for training of persons for radiological monitoring are found at NUREG-0654, element 0.4.c. The County Plan provides for ensuring that emergency workers are equipped with self-reading dosimeters and are given instruction in their use at CPIP No. 27.3.10.

Also, the County Plan identifies, at sec. 3.9, p. 3-12, provisions for safety of emergency workers that include "The guidelines in Table 3-8, p. 3-34, are used by the Emergency Preparedness Coordinator to determine when emergency workers should conduct activities that result in exposures in excess of 25 Rem. In each case, the Emergency Preparedness Coordinator consults with the Bureau of Radiation Control and makes his decision. Individuals who receive such high doses are volunteers and are advised as to the possible effects of such doses by the Emergency Preparedness Coordinator."

FEMA's review finds that training is provided to emergency workers about the effects of large doses of radiation in the County Plan.

Contention 29.(j)

The Coffey County emergency workers do not have any training program organized to teach them how to use the dosimeters.

Response

The requirements for training of persons for radiological monitoring are found at NUREG-0654, element O-4.c. The County Plan provides for ensuring that emergency workers are equipped with self-reading dosimeters and are given instruction in their use at CPIP No. 27.3.10.

The procedures discussed at CPIP No. 27.3.10 provide for the issuance, guidance in the use of, and recordation of the results of self-reading dosimeters to emergency workers. NUREG-0654 does not require that the Plan discuss or present a "training program organized to teach them to use the dosimeters".

FEMA's review finds that the provisions in CPIP No. 27.3.10 provide for training in using self-reading dosimeters. The contention's desire to see the details of the training, while having merit, is not a requirement under NUREG-0654. During testing and exercising of the Plan, FEMA will have an opportunity to evaluate the procedures cited in CPIP No. 27.3.10.

Contention 29.(k)

The training program does not adequately consider how to deal with changes in personnel and in volunteers who are trained. There will be a very substantial turnover that must be dealt with.

Response

The requirement for provision of training of persons with response duties in Radiological Emergency Preparedness Plans are found in NUREG-0654, elements 0.1. and 0.4. The County Plan assigns volunteers certain roles in the Plan. Those roles and training in support of those roles are addressed in response to Contention 29.(h) 26 above.

The County addresses training in the case of turnover of personnel in sec. 5.1, p. 5-2 where it states "In the event there is a turnover of personnel in one of the positions identified in Section 1.2 of the Contingency Plan, the Emergency Preparedness Coordinator gives the new individual a current copy of the Contingency Plan and applicable procedures, and briefs that individual in his or her responsibilities as delineated in the Contingency Plan."

This contention is also concerned with the adequacy of the training program for volunteers. FEMA's review has found that training is identified for volunteers and that it is consistent with the requirements found in NUREG-0654, elements 0.1. and 0.4.

Contention 29.(1)

The Coffey County Emergency Preparedness Coordinator is not prepared to conduct annual training sessions reviewing the elements of the County Plan and the responsibilities of each position.

Response

The requirements for conducting annual training sessions are found in NUREG-0654, element 0.5. The Coffey County Plan assigns the responsibility for training of County personnel with emergency response duties to the Coffey County Emergency Preparedness Coordinator at sec. 1.2.3 (2), p. 1-5. Procedures to implement the required training are provided in the County Plan at CPIP No. 28, pp. 1 through 6.

The contention's concern for the preparedness of the Emergency Preparedness Coordinator to conduct annual training sessions, as required in the plan, is at this time impossible to assess. NUREG-0654 does not require detailed training plans or implementing procedures in support of training. The Coffey County Plan has provided training implementation procedures and information on the nature, scope and frequency of the training, as required by NUREG-0654.

Contention 29.(m)

Inadequate consideration has been given to the amount of time annual training will take and the imposition it places upon the emergency response personnel.

Response

The contention's argument concerning inadequate consideration of the "time annual training will take and the imposition it places upon the emergency response personnel", is not a requirement in NUREG-0654.

The County Plan in CPIP No. 28, pp. 1-6 provides the procedures for training. The County Plan at CPIP No. 28.3.3 provides training plans individually designed for each position in the Emergency Response organization. The individual plans seek to develop proficiency in accomplishing the tasks assigned to the various response personnel. Development of skills is the purpose of the training requirements in NUREG-0654 and in the County Plan.

Contention 29.(n)

The State of Kansas is supposed to be able to supplement Coffey County emergency services, but the State personnel who would be doing this are not familiar with the Coffey County Plan. They will not know how to work with the County Plan. Many of these State people are not adequately trained to respond to radiological emergencies.

Response

The requirements for training of State personnel with responsibilities in Radiological Emergency Preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5.

The State Plan, in addressing the interface of the State Plan with the Coffey County Plan at Tab A, sec. 1.0, p. A-1, states that "This plan interfaces with the emergency response plans of commercial nuclear facility licensees, with those of KSU and KU, with the Coffey County Contingency Plan...". Training for State personnel of the Coffey County Plan is provided in Tab O, Table O-1, p. O-5. The training covering the Coffey County Plan is provided to ten of the fourteen State agencies listed for training.

Contention 29.(n) Cont'd

Specific training is also provided on Basic Radiation Effects and Protection to ten of the fourteen State agencies (Tab 0, Table 0-1, p. 0-5). Other specialized training, including the State agency's position and role in the State Emergency Plan, is provided for thirteen of the fourteen State agencies listed as having a role in the plan. (Tab 0, Table 0-1, p. 0-5)

Further, the State Plan states, at Tab 0, sec. 1.1, p. 0-2, that integrated state, county and nuclear facility training programs are being established as plans and procedures are finalized by each entity responsible for specific emergency preparedness activities. Initial and annual retraining programs will be prepared.

FEMA's review finds that the State Plan does provide training to state personnel in the Coffey County Plan, and that the state personnel are also provided specialized training in response to radiological emergencies.

Contention 29.(o)

The State indicates that it will implement training programs for emergency workers, but it will be able to do so because the people to provide the training have not been selected and the training courses are not developed.

Response

The requirements for training state response personnel to Radiological Emergencies are found in NUREG-0654, elements 0.1., 0.1.b., 0.4., and 0.5. NUREG-0654 does not require training programs for emergency workers. However, since the State Plan utilizes emergency workers, the State does have a requirement to provide training.

The State Plan, at Tab A, p. A-7, references that "implementation of training programs for emergency workers" was considered in development of the State Plan.

The State Plan in Tab 0, sec. 1.1, p. 0-1 references the use of the State Bureau of Radiation Control to develop the training curriculum and specialized courses.

The State Plan is, however, silent in Tab 0 on training of emergency workers. The State Plan also does not identify who the emergency workers are or from what resources they are drawn.

Contention 29.(p)

The State of Kansas Department of Emergency Preparedness is not adequately staffed to provide the necessary training for personnel involved with the emergency evacuation plan and it does not have sufficient personnel to conduct emergency preparedness drills. Although three persons are needed to adequately perform the training function, none is presently available.

Response

The requirements for provision of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4., and 0.5. The State Plan assigns the overall coordination responsibility for training Kansas personnel to the Kansas Division of Emergency Preparedness at Tab B, sec. 2.1.1.1, p. B-15.

The State Plan provides that the administrator of the Radiological Systems will carry out the training responsibility, in cooperation with the Director, Bureau of Radiation Control at Tab O, sec. 1.1, p. O-1.

The State Plan provides for the employment of the Administrator, Radiological Systems within KDEP at Tab B, sec. 2.0, p. B-13. The above Administrator is responsible for both coordination of training and the conduct of exercises and drills. (See Tab B, Figure B-3, p. B-23, and Tab N, sec. 1.0, p. N-1.)

Contention 29.(p) Cont'd

The State Plan does not place the responsibility for development and actual conduct of the training on the Administrator, Radiological Services. The Administrator's role is to coordinate and direct training, as provided in the State Plan at Tab C, sec. 1.1, p. C-1, which states:

"The Administrator, Radiological Systems directs the conduct of the state portion of the courses and participates in these courses as appropriate. However, course instruction will be presented largely by qualified personnel from the BRC and by personnel from the nuclear facilities where an agreement has been reached for the conduct of joint training activities.

The Director, BRC, is responsible for supporting the development and conduct of the state's portion of the combined radiological emergency response training curriculum by providing qualified personnel to develop and instruct specialized courses."

The contention specifically addresses training for personnel involved with evacuation. The State Plan at Tab B, Figure B-3, p. B-23 identifies seven functions (Nos. 7-13) where state agencies have assignments related to emergency evacuation. Eight state agencies have twenty definite primary or support assignments in the evacuation process (Figure B-3, cited above). FEMA finds that training is provided to all the agencies in meeting their primary or secondary roles in the evacuation process, except the Governor's office which has a primary role in the plan. In fact, the Governor's office is only trained

Contention 29.(p) Cont'd

in the Basic Plant Emergency Information. FEMA believes that the Governor's office should receive training in the three emergency plans and their role in the State Plan.

Contention 29.(g)

The State does not have adequate plans to train State personnel having emergency responsibilities. The Bureau of Radiation Control is responsible for supporting and developing conduct of radiological emergency response training, but has not established plans or courses for providing such training.

Response

The requirement for provision of training of State personnel with responsibilities in radiological monitoring are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5. The State Plan addresses training offered by the State government at Tab 0, sec. 1.1, p. 0-1 and references additional training available at Tab 0, sec. 1.2, p. 0-3. The State Plan is required by NUREG-0654, element 0.4., to establish a training program for instructing and qualifying personnel who will implement the radiological emergency response plans. The State Plan, at Tab 0, sec. 1.1, p. 0-2, states that "Integrated state, county and nuclear facility training programs are being established as plans and procedures are finalized by each entity responsible for specific emergency preparedness activities." The State Plan lists five personnel classes to receive training at Tab 0, sec. 1.1, p. 0-2. The State Plan lists eight specific areas of training to be provided in the State's basic course to the State emergency response personnel at Tab 0, sec. 1.1, p. 0-3. In Table 0-1, p. 0-5 the State Plan identifies fourteen state agencies to receive training in eight different subject areas.

Contention 29.(q) Cont'd

The State Plan identifies fifty-four (54) training segments to be completed by the State response personnel representing fourteen state agencies. NUREG-0654, elements 0.4. and 0.5., also require the State Plan to provide for specialized initial training and periodic retraining (including the scope, nature and frequency). The State Plan addresses this requirement and the contention's argument that the courses and plans have not been established in Tab 0. The State Plan states at Tab 0, sec. 1.1., p. 0-2, that "an initial required course designed to accomplish the above objectives will be presented to state and local emergency response personnel prior to the initial emergency response exercise for licensed nuclear facilities within the State of Kansas. The basic course will be offered annually thereafter as required training for new emergency response personnel."

FEMA's review finds that the State Plan has developed training plans, consistent with the requirements of NUREG-0654, that address the responsibilities of the State personnel assigned duties under the State Plan. FEMA has made some comments on some needed changes to specific parts of the training program such as training for emergency workers at the response to Contention 29.(o) and the Governor's staff at response to contention 29.(p). However, these are not major changes.

Contention 29.(r)

Only "selected state and local emergency response personnel" will receive the initial forty hour course designated to accomplish the training objectives of the State. All such personnel should receive this training or at a minimum the number and types of personnel who will receive this training should be specified in the State Plan.

Response

The requirement for provisions of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5. NUREG-0654, element 0.4., does not require the State Plan to identify personnel, the number or types to receive training. NUREG-0654, element 0.1., does require the State Plan to train appropriate individuals and personnel.

The State Plan does provide in Tab 0, Table 0-1, p. 0-5, a listing of fourteen (14) state agencies to receive the basic training discussed in the Contention. The plan does not list the number of individuals to receive training and is not required to do so. It does in the matrix provided in Tab 0, Table 0-1, p. 0-5, provide a breakdown on the types of training each state organization is to receive. Also, the State has "selected" certain personnel to receive the training as suggested in the contention. The State's selection of certain state and local emergency response personnel to receive the basic

Contention 29.(r) Cont'd

training is consistent with the NUREG-0654 requirements since the State has included those personnel that have responsibilities in implementing the Radiological Emergency Plans.

FEMA, as stated in the response to Contention 29.(q), is recommending minor changes to the training program. However, the State's overall training program does address the minimum NUREG-0654 requirements.

Contention 29.(s), 1-8

The following State personnel lack sufficient training to perform their assigned functions and should be trained in the identified areas:

Contention 29.(s) 1

State Department of Emergency Preparedness personnel. Training of people involved in the plan and the conduct of emergency planning drills.

Response

The requirements for provisions of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4., and 0.5. The State Plan at Tab B, Figure B-3, p. B-23 assigns the Kansas Division of Emergency Preparedness with nine emergency functions.

Training is provided to the staff of the KDEP in support of their roles in the Plan at Tab 0, Table 0-1, p. 0-5. The State Plan identifies six areas of training for the KDEP: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; 4) Self-Protection Radiation Monitoring; 5) Radiation Survey Instrumentation; and 6) Position and Role in the State Emergency Plan.

The training provided addresses the functional areas of responsibilities assigned to the staff of KDEP.

Contention 29.(s) 1 Cont'd

Specific training for KDEP personnel in the conduct of drills and exercises is not included in the Plan. However, provisions for assistance from federal Agencies (FEMA, DOE, NRC, etc.) in the development and conduct of radiological emergency response training, drills is provided at Tab 0, sec. 1.2, p. 0-3. The Plan is consistent with the requirements of NUREG-0654.

Contention 29.(s) 2

Kansas Department of Health and Environment personnel. Familiarity with State and Coffey County Plans, so can meet its primary and support responsibilities as specified in the State Plan.

Response

The requirements for provision of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4, and 0.5. The State Plan at Tab B, Figure B-3, p. B-23 assigns the Kansas Department of Health and Environment with fifteen functions.

Training in support of those functions is identified in Tab 0, Table 0-1, p. 0-5. Six areas of training are identified for the KDHE personnel: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the three Emergency Plans (State, County and Utility); 4) Self-Protection Radiation Monitoring; 5) Radiation Survey Instrumentation; and 6) Position and Role in the State Emergency Plan.

FEMA's review finds that the State Plan contains provisions consistent with those in NUREG-0654 for training the KDHE personnel in support of their responsibilities as described in the State Plan.

Contention 29.(s) 3

Kansas Bureau of Radiation Control personnel. Determining existence of off-site contamination.

Response

The requirement for provision of training of State personnel with responsibilities in radiological monitoring are found in NUREG-0654, elements 0.1., 0.1.b., 0.4., and 0.5. The State Plan assigns responsibilities at Tab B, Figure B-3, p. B-23 to the Kansas Bureau of Radiation Control (KBRC). The KBRC is under the Kansas Division of Health and Environment (KDHE).

Training is provided to the staff of the KDHE and KBRC in support of their roles in the plan at Tab 0, Table 0-1, p. 0-5. The State Plan identifies six areas of training for the KDHE and KBRC: 1) Basic Radiation Effects and Protection; 2) Basic Nuclear Plant Concepts; 3) Overview of the Three Emergency Plans; 4) Self-Protection Radiation Monitoring; 5) Radiation Survey Instrumentation; and 6) Position and Role in the State Emergency Plan.

The contention's specific concern is in off-site radiological assessment. The KBRC has the responsibility for assessment of incidents at fixed nuclear facilities at Tab I, sec. 1.1.2, p. 1-2. The State Plan provides the procedures and personnel to be used in this assessment in Tab I, sec. 1.1.1, p. 1-2. The KBRC staff is provided training in Radiation Survey Instrumentation in Tab 0, Table 0-1, p. 0-5.

Contention 29.(s) 3 Cont'd

FEMA's review finds that the State Plan's provisions are consistent with those in NUREG-0654, for training of the KBRC personnel in support of their responsibilities as described in the plan.

FEMA suggests that the State revise the chart at Tab B, Figure B-1, p. B-21 to clearly show that the KBRC is a bureau under the KDHE.

Contention 29.(s) 4

Kansas National Guard Unit in Burlington, Kansas. Management of roadblocks and traffic control; evacuation of nursing homes and others; use of protective gear.

Response

The requirements for provision of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4., and 0.5. The State Plan at Tab B, Figure B-3, p. B-23, assigns thirteen responsibilities to the Kansas National Guard. The National Guard's support responsibilities are to provide assistance to local government(s) as directed by the Governor. See Tab B, sec. 2.1.2.4, p. B-16.

The State Plan provides for training of the Kansas National Guard in support of its responsibilities at Tab 0, Table 0-1, p. 0-5. Four areas of training are identified for the Kansas National Guard in Table 0-1: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in the State Emergency Plan.

A review of the functions assigned in the State Plan to the Kansas National Guard indicates that the State is utilizing the Guard in roles, such as emergency communications, traffic control, military assistance, security, radiological monitoring, evacuation, etc., that are routine activities of the

Contention 29.(s) 4 Cont'd

guard and as such would not require specific training. Where training for the guards' role is critical (i.e., their role in the State Plan and their support role to local governments, especially Coffey County and its Plan), the State has provided it.

FEMA's review finds that the State Plan contains provisions, consistent with those in NUREG-0654, for training of the Kansas National Guard in support of their responsibilities as described in the State Plan.

Contention 29.(s) 5

Kansas Highway Patrol personnel. Responsibilities specified in the State Plan.

Response

The requirements for provision of training of State Personnel with responsibilities in radiological emergency preparedness are found in NUREC-0654, elements 0.1., 0.1.b., 0.4. and 0.5. The State Plan at Tab B, Figure B-3, p. B-23, assigns eight responsibilities to the Kansas Highway Patrol. Most of these responsibilities are routine activities and as such would not require specific training. These roles include: emergency communication; control of evacuation routes; emergency ground transportation; security; etc. (See State Plan, Tab B, Figure B-3, p. B-23.) The only function that is not a routine one normally associated with the Highway Patrol, and one that the Patrol has a support role in the State Plan, is in off-site radiological monitoring. The state has provided for training in this area.

The State Plan at Tab 0, Table 0-1, p. 0-5 identifies four areas of training to support the roles in the State Plan assigned to the Kansas Highway Patrol: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiological Monitoring; and 4) Position and Role in the State Emergency Plan.

Contention 29.(s) 5 Cont'd

FEMA's review finds that the State Plan has developed training plans, consistent with the requirements of NUREG-0654, that address the responsibilities assigned to the Kansas Highway Patrol.

Contention 29.(s) 6

Kansas Department of Transportation personnel. Responsibilities specified in the State Plan.

Response

The requirements for provision of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5. The State Plan at Tab B, Figure B-3, p. B-23 assigns seven support functions to the Kansas Department of Transportation personnel. Most of these responsibilities are routine functions and would not require specialized training. These roles include emergency communication, control of evacuation routes, evacuation emergency ground transportation and keeping evacuation routes open (See Tab B, Figure B-3, p. B-23). Only two functions are not routine and normally associated with personnel of the Department of Transportation. Those two functions are to serve support roles in off-site radiological monitoring and decontamination operations, if required.

The State Plan at Tab O, Table O-1, p. O-5, identifies four areas of training to support the roles in the State Plan that are assigned to the Kansas Department of Transportation personnel: 1) Basic Radiation Effects and Protection; 2) Overview of the Three Emergency Plans; 3) Self-Protection Radiological Monitoring; and 4) Position and Role in the State Emergency Plan. The State Plan also identifies in Table O-1 two additional training areas for

Contention 29.(s) 6 Cont'd

those Kansas Department of Transportation personnel who may be members of a Joint Radiation Team. The additional training includes: 1) Basic Nuclear Plant Concepts and 2) Radiation Survey Instrumentation.

FEMA's review finds that the State Plan has developed training plans, consistent with the requirements of NUREG-0654, that address the responsibilities assigned to the Kansas Department of Transportation.

Contention 29.(s) 7

Kansas Department of Social and Rehabilitation Services.

Response

The requirements for provision of training for State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5. The State Plan at Tab B, Figure B-3, p. B-23 assigns eight functions to the Kansas Department of Social and Rehabilitation Services (KDSRS). All of the roles assigned to the KDSRS in the State Plan are considered routine and as such should not require any specialized training. They include emergency sanitation services for assembly areas, emergency lodging, feeding, potable water and clothing, etc.

The State Plan at Tab O, Table O-1, p. O-5, provides training in support of the responsibilities of the KDSRS. Two areas of training are identified: 1) Basic Plant and Emergency Information Course and 2) Position and Role in the State Emergency Plan. FEMA's review of the KDSRS roles such as in assisting in operation of registration centers (Tab B, sec. 2.1.2.11, p. B-17) and coordination of Red Cross and other private welfare groups, suggests that the KDSRS personnel need training in the other plans (Coffey County and WCGS). FEMA believes that training in an "Overview of the Three Emergency Plans" should be mandatory for the KDSRS personnel.

Contention 29.(s) (8)

Kansas Fish and Game Commission personnel.

Response

The requirements for provision of training of State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.1., 0.1.b., 0.4. and 0.5. The State Plan at Tab B, sec. 2.1.2.5, p. B-17, and at Tab B, Figure B-3, p. B-23, assigns four functions to the Kansas Fish and Game Commission: 1) provide a support role in emergency ground transportation (Note: Coffey County retains primary responsibility); 2) provide primary role in control of game animals, birds and fish in contaminated areas, 3) assist KDHE in investigating water pollution, and 4) provide the New Strawn District Office as the State Forward Staging Area in case of activation of the State Plan for an emergency at the WCGS.

Training in support of the responsibilities assigned to the Kansas Fish and Game Commission (KFGC) personnel are provided in the State Plan at Tab 0, Table 0-1, p. 0-5. Four areas of training are identified: 1) Basic Radiation Effects and Protection; 2) An Overview of the Three Emergency Plans; 3) Self-Protection Radiation Monitoring; and 4) Position and Role in the State Emergency Plan. Since the State Plan identifies a role of the KFGC personnel in investigating water pollution (radiological contamination), FEMA believes that training in Radiation Survey Instrumentation should be mandatory for those KFGC personnel involved in investigating possible radiological contamination areas.

Contention 29(s) 8 Cont'd

A role for the KFGC is also found in the Coffey County Plan, sec. 3.2, p. 3-4, in notifying persons and confirmation of evacuation for areas under their jurisdiction at the Otter Creek Game Management Area. The County Plan contains draft procedures for this activity at Appendix I. This responsibility was not included in the State Plan. Consequently, the training addressed above should be mandatory for those KFGC personnel at Otter Creek Game Management Area.

Contention 29.(t)

The State Plan talks about annual retraining programs that will be prepared for State emergency response personnel. These programs have not been prepared and the personnel have not been trained.

Response

The requirement for provision of annual retraining programs for State personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, elements 0.4., and 0.5. NUREG-0654 does not require that the State provide a schedule for training.

The State discusses the development of annual retraining programs at Tab 0, sec. 1.1, p. 0-2. The State Plan stresses that the training programs for the State, County and Nuclear Facility are being "integrated" as the plans and procedures are "finalized". Further, the State Plan provides that the basic required course (which will be offered thereafter, annually for required retraining) "will be presented to State and local emergency response personnel prior to the initial emergency response exercise for licensed nuclear facilities within the State of Kansas" at Tab 0, sec. 1.1, p. 0-2.

The State Plan's training program anticipates training to occur prior to the first exercise and upon completion of the three plans and procedures and their integration. The State has also provided the nature, scope and frequency of training as required by NUREG-0654, element 0.4. The contention's argument

Contention 29(t) Cont'd

that the programs have not been prepared is not refuted. However, the State's approach at integrating the training programs is sound. This approach does require them to have finalized plans and procedures prior to their actual implementation. The State has documented in the Plan its intent to have the training programs presented to the State personnel prior to the initial exercise. There are no apparent impediments to State implementation of the annual retraining program.

Contention 29.(u) 1-2

The following Federal personnel lack sufficient training to perform their assigned functions:

Contention 29.(u) 1 - U.S. Army Corps of Engineers personnelResponse

The requirements for provision of training of personnel with response duties in radiological emergency preparedness are found in NUREG-0654, elements 0.1., and 0.4. The County Plan at sec. 3.2, p. 3-4, identifies a joint role for the U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service and the Kansas Fish and Game Commission in notifying persons and in confirmation of their respective jurisdictions evacuation.

The County Plan states at sec. 3.2, p. 3-4, "These functions are performed, per procedures maintained by these agencies. In addition, these three agencies are supplied with commercial grade tone alert radios."

The U.S. Army Corps of Engineers, U.S. Fish and Wildlife Service, and the Kansas Fish and Game Commission are responsible for the following areas: the John Redmond Reservoir, the Flint Hills National Wildlife Refuge, and the Otter Creek Game Management Area, respectively. These areas are all located within the 10-mile Emergency Planning Zone.

Contention 29.(u) 1 Cont'd

Draft procedures for implementing the responsibilities assigned above are provided in draft in Appendix I of the County Plan.

The County Plan at CPIP No. 28 does not provide training for the U.S. Army Corps of Engineers or the U.S. Fish and Wildlife Service. The State Plan does provide training for the Kansas Fish and Game Commission personnel. However, it does not identify any KFGC role or special training in support of the KFGC personnel at the Otter Creek Game Management Area. See response to Contention 29.(s)8.

FEMA's review finds that training is not provided in the County Plan or State Plan in support of the role the above three agencies have in the County Plan.

Contention 29.(u) 2 - U.S. Fish and Wildlife Service personnel.

Response

See response to Contention 29.(u) 1, above.

Contention 30.(a)

The planning for the drills and exercises by Coffey County is not adequate.

Response

NUREG-0654 states under Planning Standard N, Exercises and Drills, that "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." This Planning Standard is followed by five evaluation criteria which detail features that the plans for exercises and drills must possess.

The Coffey County Plan, sec. 5.2, p. 5-2 sets forth the exercise and drill requirements.

A comparison of Coffey County's plan for exercises and drills against NUREG-0654's Planning Standard N, and its evaluation criteria, shows the County Plan to be adequate.

Contention 30.(b)

The planning for the drills and exercises by the State is not adequate.

Response

NUREG-0654 states under Planning Standard N., Exercises and Drills, that "Period 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." This Planning Standard is followed by five evaluation criteria which detail features that the plans for exercises and drills must possess.

A comparison of the State's plan for exercises and drills against NUREG-0654's Planning Standard N., and its evaluation criteria, shows the State Plan to be adequate in the main, with the following reservations.

First, at Tab N., p. N-2, we find the statement, "One exercise may be initiated between 6:00 a.m. and midnight and another between midnight and 6:00 a.m. once every six years." The word "may" is too weak here, and should be "must," since NUREG-0654 requires (in element N.1.b) such an exercise every six years.

Contention 30.(b) Cont'd

Also, the State Plan makes no mention of conducting exercises under various weather conditions or conducting unannounced exercises, as NUREG-0654 specifically requires in element N.1.b. These provisions should be added to the Plan.

Furthermore, the Regional Assistance Committee reviewer from EPA maintains that health physics drills are not addressed in the State Plan, as required by NUREG-0654, element N.2.3. He points out that, even though the title of Section N.2.2 of the State Plan is given as "Radiological and Health Physics Drills," the aspect of health physics is not discussed in the text. This should be remedied.

Contention 30.(c)

The Emergency Preparedness Coordinator has not made arrangements to coordinate training drills and exercises with KG&E and the State agencies.

Response

NUREG-0654 does not have a specific requirement bearing on this contention.

The Coffey County Plan, sec. 1.2.3., p. 1-5, gives as one of the duties of the Emergency Preparedness Coordinator: Coordinate training drills and exercises with KG&E, the Kansas Division of Emergency Preparedness and Department of Health and Environment. Sec. 5.2 of the County Plan, pp. 5-2 and 5-3, provides for monthly communication drills involving the County, WCGS and KDEP. It also stipulates that there shall be annual radiological monitoring drills, and an at least annual joint exercise with KG&E and the State. The actual performance of the Emergency Preparedness Coordinator will be assessed during the observation and critique of the annual exercise by Federal observers.

Contention 30.(d)

The details of the drills should be specified in the County Plan and there should be specifics about the goals of the drills so that the Emergency Response Coordinator can measure the results to determine if the personnel and equipment are adequate to deal with an emergency.

Response

NUREG-0654, elements N.3.a-f, set out guidelines that scenarios for drills and exercises have to meet. FEMA's review of the County Plan in the light of these constraints shows it to be adequate. NUREG-0654 does not envision the setting down of the details of every conceivable drill and exercise in the Plan itself. Rather, it regulates the form and provisions of the scenarios of drills and exercises. Evaluation by the Emergency Preparedness Coordinator of the results of drills and exercises does not require that the details of all drills and exercises be included in the Plan itself.

Contention 31.(a)

The personnel, materials, etc. required for the emergency response should be detailed more, and the person responsible for the control of the personnel and materials should be designated in more detail.

Response

The requirements for personnel, and materials required for emergency response are set out in NUREG-0654, element C. The requirements for the assignment of responsibilities and those for onsite emergency organizations are set out in NUREG-0654, elements A. and B.

Under the above criteria, each organization is required to identify and arrange for effective use of resources and organizations capable of augmenting the planned response. Each organization is also responsible for staffing which enables initial and continuous response. This requires each organization to identify a specific individual by title who is in charge of the emergency response.

The Coffey County Plan identifies resources required for emergency response and assigns them to individuals responsible for specific functions (sec. 1.0, Table 1-1, p. 1-16). The Sheriff is responsible for resources needed to secure the area (sec. 1.2.2 (10), p. 1-4) while the County Engineer is responsible for barricades and personnel to set up road blocks (sec. 1.2.5.(3), p. 1-7). The

Contention 31.(a) Cont'd

Board of Coffey County Commissioners is assigned the responsibility for establishing priorities for the emergency use of Coffey County resources not explicitly identified in the Plan (sec. 1.2.1 (4), p. 1-3).

Detailed descriptions of personnel and materials required for emergency response are outlined in the Contingency Plan Implementation Procedures of the plan. CPIP No. 23 identifies key personnel and resources the Shelter Systems Officer would require such as CPIP No. 23.3.4: "The Shelter Systems Officer requests the Bureau of Radiation Control to send a representative to each designated Registration Center to assist in radiological monitoring and possible decontamination of evacuees". CPIP No. 21.3.7 lists specific resources the Health and Medical Management Team Leader would need for evacuating non-ambulatory patients. In this manner, the County has detailed materials, resources and personnel to augment their Plan.

The Plan specifies how the Emergency Response Organization is to be staffed by listing titles of the key participants and the responsibilities assigned to each (sec. 1.0, pp. 1-1 through 1-13). The Chairman of the Board of Coffey County Commissioners is ultimately responsible for the functioning of the Emergency Response Organization. He is tasked with assuring continuous staffing and requesting any resources required by the State (sec. 1.2.1, pp. 1-2 and 1-3). The County Plan is consistent with the requirements of NUREG-0654.

Contention 31.(b)

The County Plan is deficient because it does not adequately indicate the number of the various types of equipment (other than dosimetry) that will need to be issued to County emergency workers.

Response

The requirements for provision of equipment to be issued to County emergency workers are set forth in NUREG-0654, element H.11. This requires the County Plan to include lists of protective equipment, communications equipment, radiological monitoring equipment and emergency supplies.

A list of radiological monitoring equipment is shown in sec. 4.0, Table 4-1, p. 4-6, of the Coffey County Plan. Communications equipment is described in secs. 4.2.1, 4.2.2, 4.2.3 and 4.2.4 of the Plan. This includes a description of telephone and radio equipment in the EOC as well as the radio system and teletype equipment in the County Sheriff's Office. Emergency supplies needed to implement the Plan are listed in the various Contingency Plan Implementing Procedures. For example, CPIP No. 21.3.7 states that the Health and Medical Management Team Leader procures supplies from the Burlington Funeral Director, National Guard and the MAST program.

Section 31.(b) Cont'd

The County Plan does not list the number of emergency workers who will need to be supplied with protective equipment. The Plan should specify this information as well as the location where this equipment is to be stored and procedures for distribution.

Contention 31.(c)

The fire departments of Burlington and other cities in Coffey County do not have radio equipment which is needed to communicate with the Sheriff's Office.

Response

The requirements for provision of communication capability among emergency response personnel are set forth in NUREG-0654, elements E.2. and F.1. Under this criteria, each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel and shall establish reliable primary and backup means of communication.

The Coffey County Plan defines the alerting procedure for fire departments in the county in sec. 1.2.6 (3), p. 1-8 and also in sec. 3.0, Table 3-1, p. 3-23. The Plan assigns this responsibility to the Fire Leader. During a Site Area Emergency or General Emergency, the Fire Leader is required to immediately proceed to the Emergency Operation Center (EOC), confer with the Emergency Preparedness Coordinator, and then "notifies the Fire Chiefs of all fire departments in Coffey County" (CPIP Nos. 19.3.2, 19.3.3, 19.3.4). Therefore, the County Plan specifies that the Fire Leader, not the Sheriff, is responsible for alerting, notifying and mobilizing emergency response personnel from the fire departments in Coffey County.

Contention 31.(c) Cont'd

The County Plan specifies that the Fire Leader proceeds directly to the EOC to make these notifications (CPIP No. 19.3.2). The County EOC is equipped with a telephone system which would serve as the primary means of communication for notifying the fire departments. A proposed radio system linking these fire departments with the EOC (sec. 4.2.2 (3), p. 4-2) would satisfy the requirement for a backup means of communication.

Contention 31.(d)

The Coffey County Road Department needs radio equipment for its vehicles to communicate with the Sheriff and others in the event of an emergency.

Response

The requirements for provision of communication capability among emergency response personnel are set forth in NUREG-0654, elements E.2. and F.1. Under this criteria, each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel and shall establish reliable primary and backup means of communication.

The Coffey County Plan defines the alerting procedure for the County Road and Bridge Crew in sec. 3.0, Table 3-1, page 3-23. The Plan assigns this responsibility to the County Engineer. During a Site Area or General Emergency the County Engineer is required to immediately proceed to the County EOC (CPIP No. 17.3.2). The County Engineer dispatches his crews and calls in other personnel assigned to him (CPIP No. 17.3.6). Therefore, the County Engineer, not the Sheriff, is responsible for alerting, notifying and mobilizing emergency response personnel from the County Road and Bridge Crew.

Contention 31.(d) Cont'd

The County Plan specifies that the County Engineer proceeds directly to the EOC to make these notifications. The County EOC is equipped with a telephone system and has radio capability with all county vehicles (secs. 4.2.1 and 4.2.2 p. 4-1). Use of this telephone and radio capability establishes reliable primary and backup means of communication.

Contention 31.(f)

Protection gear for protection against radiation is needed for all workers who are involved in the evacuation plan. Three hundred fifty people will be involved in three shifts. If so, 116 sets of protective gear are required.

Response

The requirements for provision of equipment to be issued emergency workers are set forth in NUREG-0654, element H.11.. The document, "EPA Responsibilities and Functions In Improving State and Local Preparedness To Respond To Radiological Emergencies At Nuclear Facilities", Element H.11, p. 24, provides the following guidance concerning this. The kits should be "available with appropriate equipment to protect emergency workers, as well as kits for monitoring teams." The kits should include personnel monitoring equipment and procedures for obtaining and administering stable iodine. Monitoring team kits should include the designated monitoring instruments and their instruction books, check sources, consumable supplies, and maps showing monitoring locations, forms and conversion factors.

The County Plan does not list the number of emergency workers who will need to be supplied with this equipment. The Plan should specify this information as well as the location where this equipment is to be stored and procedures for distribution. After consulting with the EPA member of the RAC, FEMA believes

Contention 31.(f) Cont'd

that the number of sets of protective equipment will be less than the number cited in the contention. From the information presented in the Plan, we cannot determine the number of sets that would be required.

Contention 31.(h)

The Chairman of the County Commission is not capable of assuring that the portions of the emergency response organization which requires 24-hour per day coverage are staffed or that the required resources are requested from the State. The County Plan needs to set forth how he will accomplish this in relation to other people involved in the plan.

Response

The requirement for designating an individual in charge, describing the organization's concept of operations, and providing for continuous emergency response are set forth in NUREG-0654, element A. The requirement for requesting and using assistance resources are set forth in NUREG-0654, elements C.1.c. and C.4.

The Coffey County Plan specifically assigns the responsibility for assuring 24-hour operation of the Emergency Response Organization to the Chairman of the Board of County Commissioners; it also assigns him responsibility for requesting required resources from the State (sec. 1.2.1, p. 1-3). The Emergency Response Organization of Coffey County is described in detail in sec. 1.0, pp. 1-1 through 1-16. Responsibilities of each member are outlined in this section and further refined in the Contingency Plan Implementing Procedures contained in the Plan.

Contention 31.(h) Cont'd

The Chairman of the Board is directed to proceed to the County EOC in the event of a Site or General Emergency (CPIP No. 6.3.2, CPIP No. 7.3.2). According to the Plan, the Chairman would oversee the activities of the Emergency Response Organization from the EOC and therefore, would be able to assess the overall response as well as specified resources required by members of the organization. The Plan meets the requirements set forth in NUREG-0654 as stated above. There is nothing that would indicate that the Chairman has been assigned responsibilities he is not capable of accomplishing.

Contention 31.(i)

The County Plan is deficient because it does not describe the resources of the State of Kansas that are available to the emergency response organization and how they will be made available to the emergency response organization.

Response

The requirement for provision of local emergency response support and resources are set forth in NUREG-0654, elements C.1.a., C.2.a., and C.4. This requires that arrangements for requesting and effectively using assistance resources have been made and that other organizations capable of augmenting the planned response have been identified.

The County Plan identifies response organizations which would interface with Coffey County in sec. 1.0, Figure 1-2, p. 1-15. The County Plan refers to resources of the State of Kansas in sec. 1.4.1, p. 1-12, and outlines the people responsible for requesting specific resources in sec. 1.2, pp. 1-2 through 1-12. The County Plan specifies that State resources and a description of the way they are administered can be found in Annex A to Assistance R of the State Plan.

The State Plan lists Emergency Response Support and Resources in Tab C, pp. C-1 through C-12. Listings of other State resources can be found in the State Plan such as Tab H, Table H-1, p. H-7, radiological monitoring equipment

Contention 31.(i) Cont'd

and Tab L, Table L-1, pp. L-4 through L-7, Medical and Public Health Support.

Federal criteria does not require that this type of information be restated in local plans. The reference in the County Plan is adequate.

Contention 31.(j)

The State Plan should detail how many people and how much equipment are needed to respond to the emergency at Wolf Creek.

Response

The requirement for provision of State emergency response support and resources are set forth in NUREG-0654, element C. This requires that arrangements for effectively using assistance resources have been made including expected times of arrival of Federal resources at the nuclear facility site.

The State Plan details the State departments and their response functions in Tab B, Figure B-3, p. B-23. Each of these department's primary and support responsibilities are explained in Tab B, sec. 2.1, pp. B-15 through B-18. Specific listings of Federal resources including their expected times of arrival to Wolf Creek are shown in Tab C, Table C-1, pp. C-7 through C-11. This includes the number of personnel that would be responding for each of the Federal agencies.

State resources such as the mobile command center, its equipment and travel time to Wolf Creek are described in Tab F, sec. 2.0, pp. F-2 through F-4. Additional information concerning communications resources are shown in Tab F, Tables F-1 through G-5, pp. F-13 through F-17. Other emergency facilities and equipment are listed in Tab H, sec. 1.0. This includes a list of equipment

Contention 31.(j) Cont'd

which will be made available to survey teams or other personnel performing tasks within the plume exposure EPZ (Tab H, Tables H-1 and H-2, pp. H-7 through H-9). The State Plan is consistent with the requirements of NUREG-0654.

Contention 31.(k)

The emergency equipment described in Section 1.6, page H-5, of the State Plan will not be adequate to handle an emergency. More equipment will be required.

Response

The requirement for provision of emergency equipment are set forth in NUREG-0654, element H.11. The State Plan, sec. 1.6, p. H-5, refers to "equipment that will be made available to survey teams or other personnel performing tasks within a plume exposure EPZ". Lists of this equipment are provided in the Plan in Table H-1 and H-2, pp. H-7 through H-9.

The document, "EPA Responsibilities And Functions In Improving State And Local Preparedness To Respond To Radiological Emergencies At Nuclear Facilities", Element H.11, p. 24, provides the following guidance concerning this. The kits should be "available with appropriate equipment to protect emergency workers, as well as kits for monitoring teams". The kits should include personnel monitoring equipment and procedures for obtaining and administering stable iodine. Monitoring team kits should include the designated monitoring instruments and their instructions books, check sources, consumable supplies, and maps showing monitoring locations, forms and conversion factors.

Contention 31.(k) Cont'd

The list of equipment in the State Plan includes personnel monitoring equipment, various types of monitoring instruments, protective clothing sets and other detection equipment. The lists do not include procedures for obtaining and administering stable iodine, monitoring kit instruction books, check sources, consumable supplies, and maps showing monitoring locations, forms and conversion factors. The State Plan should be revised to include this information in order to comply with the EPA guidelines cited above.

Contention 31.(1)

None of the equipment described in Section 1.6, page H-5, of the State Plan is located in Coffey County; it will not be available to Coffey County emergency personnel in a short enough period of time.

Response

The requirements for provision of radiological monitoring equipment at the local level are set forth in NUREG-0654, element H.7. The County Plan describes the type of radiation monitoring equipment located in Coffey County in sec. 4.0, Table 4-1, p. 4-6. The responsibility for maintaining this equipment is assigned to the Radiological Defense Officer (sec. 3.10, p. 3-12); he is also responsible for issuing this equipment to County emergency workers (sec. 1.2.10(3), p. 1-11). In addition to these local responsibilities, the Radiological Defense Officer coordinates radiological monitoring efforts provided by State resources (sec. 1.2.10(6), p. 1-11).

The State Plan describes the State's role as one of assisting the County emergency organization should a situation warranting evacuation arise (Tab. J. p. J-3). The Kansas Division of Emergency Preparedness (KDEP) is required to provide radiological monitoring support to the County (Section 2.1.1.1, p. B-15). The equipment required by KDEP to fulfill this support responsibility is listed in sec. 1.6, page H-5, of the State Plan. This equipment is not

Content: on 31.(1) Cont'd

intended for the initial response which would be coordinated by Coffey County officials.

Contention 31.(m)

There is no plan specified for issuing equipment to County emergency workers.

Response

The requirements for provision of equipment are set forth in NUREG-0654, element H.11. This specifies that the Plan should include identification of emergency kits by general category.

The County Plan does not list the number of emergency workers who will need to be supplied with this equipment. The Plan should specify this information as well as the location where this equipment is to be stored and procedures for distribution.

Contention 31.(n)

The State Department of Transportation personnel are not equipped to perform responsibilities in the State Plan.

Response

The requirements for provisions of State personnel with resources and equipment necessary to support their radiological emergency preparedness responsibilities are found in NUREG-0654, elements C. and H. The State Plan assigns the Kansas Department of Transportation (KDOT) with seven support functions at Tab B, Figure B-3, B-23.

The State Plan assigns to the KDOT roles that are consistent for the most part, with their day-to-day responsibilities. Their roles include: emergency communications, disaster area evacuation, control of evacuation routes, emergency ground transportation, etc. Therefore, special or extra equipment is not required. For example, the communications capability of the KDOT is shown on Table F-2, p. F-14, and Figure F-2, p. F-19, of the State Plan.

The only function assigned to the KDOT that is not routine and one in which they may need specialized equipment is in their support role of radiological monitoring.

Contention 31.(n) Cont'd

The State Plan, at Tab K, sec. 2.2, p. K-2, assigns to the Kansas Division of Emergency Preparedness (KDEP) the responsibility of providing all other State and County emergency preparedness personnel with self-reading dosimetry. Other radiological monitoring equipment is available from the KDEP as provided at Tab H, Table H-1, p. H-7. Thus, to the extent that personnel from KDOT is required to support radiological monitoring equipment will be provided by KDEP.

Contention 31.(o)

The Kansas Highway Patrol personnel are not equipped to carry out all the responsibilities specified in the State Plan.

Response

The requirements for provisions of State personnel with resources and equipment necessary to support their radiological emergency preparedness responsibilities are found in NUREG-0654, elements C. and H. The State Plan assigns the Kansas Highway Patrol (KHP) with eight functions at Tab B, Figure B-3, p. B-23.

The State Plan assigns to the KHP roles that are consistent, for the most part, with their day-to-day responsibilities. These include: communication, control of evacuation points, emergency ground transportation, security, etc. (See Tab B, Figure B-3, p. B-23). Therefore, special or extra equipment is not required. For example, communications capability of the KHP is shown on Table F-2, p. F-14 and Figure F-5, p. F-17 of the State Plan.

The only function assigned to the KHP that is not routine and one in which they may need specialized equipment is in their support role of radiological monitoring.

Contention 31.(o) Cont'd

The State Plan at Tab K, sec. 2.2, p. K-2, assigns the Kansas Division of Emergency Preparedness (KDEP) with the responsibility for providing all other State and County emergency preparedness personnel with self-reading dosimetry. The State Plan lists the KHP, at Tab H, Table H-1, p. H-7, as having 10 pocket dosimeters and one dosimeter charger. Other radiological monitoring equipment is available from the State Forward Staging Area which is also the location of the KHP's mobile command center. (See Tab H, Section 1.3, p. H-4.) Thus, to the extent that personnel from KHP is required to support radiological monitoring equipment will be provided by KDEP.

Contention 31.(p)

The plan is deficient because it does not provide for the means to check and maintain equipment that will be used to implement the plan.

Response

The requirement that "Each organization shall make provisions to inspect, inventory and operationally check emergency equipment/instruments at least once each calendar quarter and after each use" is set forth in NUREG-0654, element H.10.

The Coffey County Plan lists its radiation monitoring equipment in sec. 4.0, Table 4-1, page 4-6. The Radiological Defense Officer is responsible for testing the operability of this equipment "at least once a calendar quarter" (sec. 4.3.1, p. 4-2). Other emergency equipment such as communications equipment in the County EOC is listed and described in the plan, but provisions for maintaining this equipment are not included.

The State Plan lists radiological monitoring equipment by type, quantity and location in Tab H, Tables H-1 and H-2, pp. H-7 through H-9. The plan specifies that this equipment will be inventoried and inspected quarterly and after use (Tab H, 1.6, p. H-16).

Contention 31.(q)

The plan is deficient because it does not provide for backup equipment when radiation monitoring equipment, transportation equipment for evacuation of people, and communications and warning equipment is not available or is inoperable.

Response

The requirements for provision of equipment and other resources by the State and County are set forth in NUREG-0654, element C. and H. This requires arrangements for requesting and effectively using assistance resources and adequate emergency facilities and equipment to support the emergency response. This requires the "identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment and emergency supplies)" (NUREG-0654, at H.11). NUREG-0654, element F.1, requires a primary and backup means of communication for local and State response organizations. NUREG-0654, element J.10.c., requires a "means for notifying all segments of the transient and resident population."

The Coffey County Plan describes primary (telephone) and backup (radio) communications systems located in the EOC. The county fire departments and trucks, and school superintendents and buses are not included in the present

Contention 31.(q) Cont'd

radio system, but a radio system for these resources has been proposed. The primary and backup means of communication of the State EOC are listed in Tab F, 3.0.

The County Plan describes the warning system which includes the utilization of fixed sirens, tone-activated radios, the EBS and telephone notification (sec. 3.2, pp. 3-3 and 3-4). The State Plan specifies the use of the EBS "as a means to provide specific information and direction to the general public in the event of an emergency" (Tab E, 2.1, p. E-16).

The County Plan, sec. 4.0, Table 4-1, p. 4-6, lists the County's radiation monitoring equipment by type quantity and range. Lists of this type of equipment and its location can be found in the State Plan Tab H, Tables H-1 and H-2, pp. H-7 through H-8. This comprises an "adequate" listing of this type of equipment; "backup equipment" is not required.

The County Plan assigns the County Engineer the responsibility for assuring that transportation equipment for the evacuation of people is available (sec. 3.5, page 3-8). Buses available to the school district are also available to the County Engineer to be used for other evacuation needs (sec. 3.3.1, p. 3-6). The County Plan shows that 34 buses are available in Coffey County to be used for evacuation (sec. 3.0, Table 3-7, p. 3-33). The State Plan assigns the responsibility of coordinating the federal transportation response in support of State and local authorities to the Department of Transportation (Section 1.1.8,

Contention 31.(q) Cont'd

page B-9). The State Plan also specifies that "State resources will be utilized to assist the county emergency organization should the decision to evacuate be made" (Tab J, page J-3).

Contention 31.(r)

The Kansas Department of Health and Environment does not have enough people to perform the functions specified in Section 2.1.1.2, page B-16 of the State Plan.

Response

The requirements for provision of personnel with responsibilities in radiological emergency preparedness are found in NUREG-0654, element H. The State Plan at Tab B, Figure B-3, p. B-23, assigns fifteen functions to the Kansas Department of Health and Environment (KDHE) personnel. Eight of those KDHE responsibilities are primary and seven are support.

The State Plan does not provide information on how many KDHE personnel are available or needed to perform the primary and support roles assigned to them. Therefore, FEMA is unable at this time to support or deny the contention's argument that the KDHE lacks sufficient personnel to perform their functions.

FEMA has stated in response to other contentions regarding staffing resources that while NUREG-0654 does not specifically require resource lists, it would like to see some estimation of needed resources and, where feasible, this should be included in the Plan or letters of agreements.

Contention 31.(r) Cont.d

KDHE, as a State agency, has numerous personnel that, in an emergency, could be assigned by the Governor under authority given to him under KSA 48-924 (Tab B, sec. 2.0, p. B-11). Implementing procedures or standard operating procedures (SOPs) were not available to review in responding to the above contention and the State Plan does not identify if more detailed SOP's are to be developed.

Since the information on KDHE staffing and staffing needs is not available, a definite assessment of the KDHE ability to provide personnel to support their roles will be dependent on an exercise or a review of more detailed information.

Contention 31.(s)

The Kansas Department of Transportation does not have enough staff to perform all the functions specified in sec. 2.1.2.2, p. B-17 of the State Plan.

Response

The requirements for provision of State personnel to support the State Plan are found in NUREG-0654, elements C.1.a., C.1.b., C.1.c., C.2.b., C.3. and C.4.

The State Plan, at Tab B, Figure B-3, p. B-23, assigns seven functions to the Kansas Department of Transportation personnel. All seven functions are support functions.

The State Plan does not provide information on how many KDOT personnel are available or needed to perform the support roles assigned to them. Therefore, FEMA is unable, at this time, to support or deny the contention's argument that the KDOT lacks enough staff to perform their functions.

FEMA has commented on this lack of detail in the response of Contention 31.(1) above.

KDOT, as a State agency, has numerous personnel that in an emergency could be assigned by the Governor under authority given to him under KSA 48-924 (Tab B, sec. 2.0, p. B-11). Implementing procedures or standard operating

Contention 31.(s) Cont'd

procedures (SOPs) were not available to review in responding to the above contention and the State Plan does not identify if more detailed SOPs are to be developed.

Since the information on KDOT staff and staffing needs is not available, a definite assessment of the KDOT ability to provide personnel to support their roles will be dependent on an exercise or a review of more detailed information.

Contention 31.(t)

The Kansas Highway Patrol does not have sufficient staff to perform all of the functions specified in Section 2.1.2.1, page B-17 of the State Plan.

Response

The requirements for provision of State personnel to support the State Plan are found in NUREG-0654, elements C.1.a., C.1.b., C.1.c., C.2.b., C.3. and C.4. The State Plan, at Tab B, Figure B-3, p. B-23, assigns eight functions to the Kansas Highway Patrol (KHP). Three of the eight functions are primary and the remaining five functions are to serve in a support role.

The State Plan does not provide information on how many KHP personnel are available or needed to perform the support roles assigned to them. Therefore, FEMA is unable, at this time, to support or deny the contention's argument that the KHP lacks enough staff to perform their functions.

FEMA has commented on this lack of detail in the response to Contention 31.(r) above.

The KHP as a state agency, has numerous personnel that, in an emergency, could be assigned by the Governor under authority given to him under KSA 48-924 (Tab B, sec. 2.0, p. B-11). Implementing procedures or standard operating procedures (SOPs) were not available to review in responding to the above contention and the State Plan does not identify if more detailed SOP's are to be

Contention 31.(t) Cont'd

developed. Since the information of KHP staffing and staffing needs is not available. A definite assessment of the KHP ability to provide personnel to support their roles will be dependent on an exercise or a review of more detailed information.

Contention 31.(u)

The Kansas Department of Social and Rehabilitation Services does not have sufficient staff to perform all of the functions specified in the State Plan.

Response

The requirements for provision of State personnel to support the State Plan are found in NUREG-0654, elements C.1.a., C.1.b., C.1.c., C.2.b., C.3. and C.4.

The State Plan, at Tab B, Figure B-3, p. B-23, assigns eight functions to the Kansas Department of Social and Rehabilitation Services (KDSRS) one function is a support function and seven are primary.

The State Plan does not provide information on how many KDSRS personnel are available or needed to perform the support roles assigned to them. Therefore, FEMA is unable, at this time, to support or deny the contention's argument that the KDSRS lacks enough staff to perform these functions.

FEMA has commented on this lack of detail in the response to Contention 31.(r) above.

The KDSRS, as a state agency, has numerous personnel that, in an emergency, could be assigned by the Governor under authority given to him under KSA 48-924 (Tab B, sec. 2.0, p. B-11). Implementing procedures or standard operating

Contention 31.(u) Cont'd

procedures (SOPs) were not available to review in responding to the above contention and the State Plan does not identify if more detailed SOPs are to be developed.

Since the information on KDSRS staffing and staffing needs is not available, a definite assessment of the KDSRS ability to provide personnel to support their role will be dependent on an exercise or a review of more detailed information.

Contention 31.(v)

The Plan is deficient because it does not provide for replacement of emergency workers who are not available or who fail to appear for work.

Response

NUREG-0654, sec. A.1.a, states: "Each plan shall identify the State, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones."

This planning element alludes to accident mitigation through a mosaic of response made up of State, local, Federal and private sector organizations. it is not required by NUREG-0654 that local authorities be capable of handling all aspects of a radiological emergency. The interdependency of local, State, Federal, and license response is explicitly recognized in secs. 1.4 and 1.4.1, p. 1-12 of the County Plan:

1.4 AUGMENTATION OF COUNTY RESOURCES

The County response efforts are augmented by the interface with several organizations. The interfaces between the Emergency Response Organization and other responding entities including KG&E, Federal and State agencies are shown in Figure 1-2.

Contention 31.(v) Cont'd

1.4.1 STATE OF KANSAS

The State of Kansas has resources available to the Emergency Response Organization in the event of an emergency, nuclear facility incident or otherwise. The manner in which they are administered is described in Annex A to Assistance R. The State has access to the resources of the Federal government. Requests for State assistance (with the exception of law enforcement) are channeled through the Emergency Preparedness Coordinator to the Kansas Division of Emergency Preparedness. Once a State of Disaster Emergency is declared and resources are made available, the resources are coordinated by the appropriate individuals listed in Section 1.2. Requests for law enforcement assistance are made by the County Sheriff.

Thus, it is clear that in the face of a lack of necessary emergency workers, Coffey County has the option (recognized in the Plan) of calling upon other governmental entities and the licensee for assistance.

Contention 32.(a)

Coffey County needs \$4,153,000 in additional funds (for the first five years of plant operation) for successful implementation of the evacuation plan. These funds are needed for:

Firetrucks for use at roadblocks (5)	\$100,000
Loudspeakers for warning cars	11,400
Warning tone alerts for residences and businesses	105,000
Litter buses for nursing home evacuation	25,000
Litters	1,500
Monitors (radiological)	25,000
Road barriers for roadblocks	4,600
Protective gear	58,000
Communications equipment	50,000
Additional telephones and telephone com- munication equipment	15,000
Additional communications equipment for 60 roadblocks	60,000
Decontamination equipment (200 sets) for evacuation centers	200,000
Radiation monitoring equipment (100 sets) for decontamination centers	100,000
Additional snow removal equipment (10 trucks and blades)	200,000

Contention 32.(a) Cont'd

Rental of emergency transportation vehicles	
(200 vehicles X \$50 each)	10,000
Rental of vehicles for the Radiation	
Monitoring Team (10 vehicles X \$50 each/	
day X 5 days)	2,500
Shelter for 9,000 people at evacuation	
centers (9,000 people X \$50 each/day X	
5 days)	2,250,000
Emergency medical care and evacuation for	
1,000 radiological injuries	500,000
Sirens	160,000
Annual maintenance of equipment (5 yr. X	
\$10,000/yr.)	50,000
Compensation - Emergency (300 workers X	
\$100 each/day X 5 days)	150,000
Training (5 yr.)	75,000

These costs must be covered. If not, the plan cannot be implemented. The Coffey County Commissioners have not provided for the cost and must make a commitment to do so.

Contention 32.(a) Cont'dResponse

The requirements for funding radiological emergency preparedness are addressed in the Introduction to NUREG-0654, at G., p.25, which states that the subject of funding must be discussed between the individual nuclear utility and the involved State and local governments who must prepare emergency plans to support the nuclear facilities. FEMA does not review Funding and has no comment or opinion on this contention.

Contention 32.(b)

The Kansas Emergency Preparedness Office needs \$127,000 in additional funds (for the first five years of plant operation) for successful implementation of the evacuation plan. The funds are needed for:

Training - Initial	\$27,000
Annual (5 year X \$20,000)	100,000

Response

The requirements for funding radiological emergency preparedness are addressed in NUREG-0654, Introduction at G., which states that the subject of funding must be discussed between the individual nuclear utility and the involved State and local governments who must prepare emergency plans to support the nuclear facilities (See NUREG-0654, at G., p. 25). FEMA does not review Funding and has no comment or opinion on this contention.

STATEMENT OF PROFESSIONAL QUALIFICATIONS
MARY MARLEE CARROLL

9/83 to Present

Senior Technological Hazards Specialist, Natural and Technological Hazards Division, Federal Emergency Management Agency, Region VII, Kansas City, Missouri.

Ms. Carroll supervises the Radiological Emergency Preparedness (REP) aspects of the Natural and Technological Hazards Division for Region VII. In that capacity she oversees and participates in the review and evaluation of State and local Radiological Emergency Response Plans (RERPs) against the guidelines set forth in NUREG-0654, FEMA REP 1, Revision 1, FEMA regulations as set forth in 44 C.F.R. Part 350, and other FEMA guidance documents. Ms. Carroll duties include: serving as a member of the Regional Assistance Committee (RAC); providing technical assistance relating to development of RERPs, policy development, and legislation related to REP to State and local governments; coordinate REP exercises for fixed nuclear power facilities within Region VII; coordinate, monitor, and evaluate State and local emergency planning and preparedness and prepare findings for the Regional Director pursuant to 44 C.F.R. Part 350; provide lists of plan and exercise deficiencies to State and local governments and monitor their efforts to correct those deficiencies; provide expert testimony at the request of the Nuclear Regulatory Commission on the current status of emergency plans; provide expert assistance to agency counsel relative to develop of contentions, response to discovery and similar issues; serve as a member of the Regional Emergency Response Team (ERT) and on the inter/intra regional disaster response team.

10/81 to 8/83

Community Planner, Natural and Technological Division, FEMA, Region VII.

Ms. Carroll carried out the same functions listed under her current position under the supervision of the Senior Technological Hazards Specialist. In addition Ms. Carroll was qualified as and provided expert testimony before the Atomic Safety and Licensing Board Panel in the Callaway proceeding.

8/79 to 10/81

Emergency Management Specialist, FEMA, Region VII.

Managed the Temporary Housing Assistance Program in Region VII. Ms. Carroll's responsibilities included policy development; developing Agency standard operating procedures for disaster activities related to the Program; recruited and trained staff for disaster operations; developed and administered training programs in a variety of program areas; responded to numerous disasters and performed a number of functions including establishment of disaster field offices, and serving as Disaster Assistance Center Manager to coordinate interagency disaster relief efforts.

7/72 to 8/79

Temporary Housing Specialist, Department of Housing and Urban Development, Kansas City, Missouri.

During the course of her employment with one of FEMA's predecessors Ms. Carroll responded to over 35 disasters and performed a variety of increasingly more responsible positions, including both pre-disaster

planning and field operations during disasters.

Education and Training

- 1983-83 Community Planning (6 credits) Park College, Kansas City, Missouri.
- 1983 Senior Officer Nuclear Accident Course (SONAC) Albuquerque, New Mexico.
- 1982 Alert and Notification Workshop, Washington D.C.
- 1982 Radiological Monitoring Course, Kansas City, Missouri.
- 1981 Orientation Training in Radiological Emergency Preparedness Planning, Battle Creek, Michigan.

- 1979 M.B.A., Rockhurst College, Kansas City, Missouri.
- 1971 B.A., Rosary Hill College, Buffalo, New York.

STATEMENT OF PROFESSIONAL QUALIFICATIONS
RICHARD J. LEONARD

7/83 to Present

Community Planner, Technological Hazards Branch, Natural & Technological Hazards Division, Federal Emergency Management Agency, Region VII, Kansas City, Missouri.

Mr. Leonard reviews and evaluates State and local Radiological Emergency Response Plans (RERPs) for fixed nuclear facilities in Region VII. This includes review of the RERP's, evaluation, and reporting on the adequacy of RERP exercises, coordinating the preparation of interim and final findings on the adequacy of RERP's with the Regional Assistance Committee (RAC) and State and local governments. He is also responsible for preparation of testimony for near term operating licensing hearing. Mr. Leonard is a member of the Regional Emergency Response Team (ERT).

11/80 to 6/83

Community Planner/ Civil Engineer, Natural & Technological Division, FEMA, Region VII.

Served as coordinator for the National Flood Insurance Program. Scheduled and conducted meetings involving State and local officials, the public, insurance agents, lending institutions, and developers for presentation of flood plain management regulations, flood hazard reports, and risk analysis. Served as member of the Regions Hazard Mitigation Team and performed other duties during disasters as assigned. Represented the Division on matters requiring engineering expertise.

12/77 to 11/80

Regional Representative, FEMA, Region VII.

Mr. Leonard was assigned by the Regional Director to serve as a special assistant to monitor and augment coordination of all FEMA regional programs and activities within the State of Kansas in order to promote the intergration of divisional programs to consistent with the precepts of comprehensive emergency management. Reported directly to the Regional Director.

3/75 to 12/77

Hydrologist, United States Geological Survey, Water Resources Division.

Conducted detailed hydrological studies for the Department of Housing and Urban Development of various drainage areas within the State of Missouri.

1/74 to 7/74

Volunteer Engineer, Peace Corps, Washington, D.C.

Worked as a Peace Corps Volunteer providing engineering assistance to the Venezuelan government.

Education and Training

- 1983 Organizational Behavior, Park College, Parkville, Missouri.
- 1982 Introduction to Management, Park College, Parkville Missouri.
- 1973 B.S. Civil Engineering, University of Missouri, Columbia, Missouri.

Registered Professional Engineer, State of Missouri.

Member of the National Society of Professional Engineers.

Member of Tau Beta Pi, National Engineering Honor Society.