



# Federal Emergency Management Agency

Washington, D.C. 20472

APR 12 1984

MEMORANDUM FOR: Edward L. Jordan  
Director, Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement  
U.S. Nuclear Regulatory Commission

FROM: *Richard W. Krimm*  
Richard W. Krimm  
Assistant Associate Director  
Office of Natural and Technological  
Hazards Programs

SUBJECT: Schedule of Corrective Actions for the September 14, 1983,  
Full-scale Exercise of the Offsite Radiological Emergency  
Preparedness Plans for the Calvert Cliffs Nuclear Power  
Station

Attached is a copy of the schedule of corrective actions submitted by the Maryland Emergency Management and Civil Defense Agency (MEM & CDA) in response to deficiencies cited by Region III of the Federal Emergency Management Agency (FEMA) for the September 14, 1983, Full-scale exercise of the Offsite Radiological Emergency Preparedness Plans for the Calvert Cliffs Nuclear Power Station.

FEMA Region III has essentially concurred with the schedule of corrective actions as submitted, but will be reviewing the agreements for dose assessment capabilities which have been negotiated between Baltimore Gas and Electric and Philadelphia Electric Company. Region III has requested that MEM & CDA provide the agreements as soon as possible to initiate their review. As soon as we receive the Region's analysis, we will send you the results.

If you have any questions concerning this schedule of corrective actions for the Calvert Cliffs Nuclear Power Station, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division at 287-0200.

Attachment  
As Stated

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# Federal Emergency Management Agency

Region III 6th & Walnut Streets Philadelphia, Pennsylvania 19106

MAR 22 1984

MEMORANDUM FOR: Samuel W. Speck  
Associate Director  
State and Local Programs and Support

FROM: *Thomas E. Hardy*  
Thomas E. Hardy  
Acting Regional Director

SUBJECT: Calvert Cliffs Nuclear Power Plant - Schedule  
of Corrective Actions of Deficiencies Noted by  
Evaluation Report of September 14, 1983 Exercise

Attached is Maryland's schedule of corrective actions and a copy of a letter to the State acknowledging receipt of the schedule.

All corrective actions are scheduled to be implemented by September 1, 1984 except for those that must await the next exercise.

Attachments

1120



DEPARTMENT OF  
PUBLIC SAFETY AND CORRECTIONAL SERVICES

HARRY HUGHES  
GOVERNOR  
FRANK A. HALL  
SECRETARY  
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CALVIN A. LIGHTFOOT  
DEPUTY SECRETARY  
PUBLIC SAFETY AND  
CORRECTIONAL SERVICES  
EDWIN O. TREMPER, ACTING  
DIRECTOR OF EMERGENCY MANAGEMENT  
AND CIVIL DEFENSE AGENCY

March 13, 1984

Mr. Thomas E. Hardy  
Acting Regional Director  
Federal Emergency Management Agency  
Region III  
Curtis Building - 7th Floor  
Sixth and Walnut Streets  
Philadelphia, Pennsylvania 19106

ATTENTION: Mr. James R. Asher

Dear Mr. Hardy:

Enclosed is a schedule of actions addressing the deficiencies and recommendations noted in the Federal Emergency Management Agency/Regional Assistance Committee evaluation of offsite participants in the September 14, 1983 Calvert Cliffs Nuclear Power Plant exercise. Please note that several recommendations and deficiencies have been addressed simultaneously due to their redundancy. Response to the deficiencies is found on pages 1 through 4 of the enclosure. Response to the recommendations not referenced in the deficiencies is found on pages 5 through 7 of the enclosure.

The exercise evaluation report, to which we are responding, has been a source of confusion in the analysis of some of the stated deficiencies. Throughout the report, contradictory statements and inconsistencies exist, seemingly attributable to observational and interpretational errors. We realize FEMA is striving for improved evaluation performance, but presently the evaluations are better in form than content and thus do not serve to enhance emergency planning at the state and local government level. Notwithstanding this, several observations were just and have received appropriate corrective action.

Should there be any questions or comments regarding the schedule of actions or the perceived evaluation inconsistencies, please contact Chuck Rayburn at (301) 486-4422.

Sincerely,

*John Peabody*  
EDWIN O. TREMPER  
Acting Director

EOT:CLR:bs  
Enclosure: a/s

TTY FOR DEAF - 484-4083

Response to the summary listing of deficiencies observed offsite during the Calvert Cliffs Nuclear Power Plant exercise conducted September 14, 1983.

All corrective actions will be implemented by September 1, 1984, unless specifically deferred until the next exercise. In that the FEMA exercise evaluation process has not allowed participants to clarify or refute observer comments, we have taken this opportunity to express participant comments also.

Response to Deficiency 1 (Also addresses Recommendations 4, 6 and 9).

The State of Maryland acknowledges the need to enhance its accident assessment capability, especially to provide 24-hour coverage. This is precisely why the Baltimore Gas and Electric Company (BG&E), in support of the State, has negotiated an agreement with the Philadelphia Electric Company (PECO) to have PECO provide Health Physics and field monitoring support to the State of Maryland in the event of a Calvert Cliffs emergency. Additionally BG&E has provided funds to the Maryland Department of Health and Mental Hygiene (DHMH) for the purpose of adding two Health Physicists to the Radiation Control staff.

For the purpose of the September 14, 1983 exercise, accident assessment was conducted at the Calvert Cliffs EOF (rather than the Baltimore Accident Center) in order to increase effectiveness because of the unavoidable absence of key Division of Radiation Control personnel the day of the exercise. Presence of said personnel in the Baltimore Accident Assessment Center will both permit the independent derivation of dose projections and provide technical personnel available for consultation by DHMH decision makers.

The last element of the accident assessment deficiency, the failure of St. Mary's County to receive field team data, has been addressed by making the DHMH aware of the need to provide the data. The County has been directed to request the information they need.

This deficiency is somewhat confusing in that it first states that "... the accident assessment function was adequately demonstrated ... (with) assistance from the Commonwealth of Pennsylvania," and then goes on to state accident assessment was not "... demonstrated entirely satisfactorily even with the assistance of Pennsylvania." Maryland does wish to point out, however, that while it is striving to upgrade its capability in this area to an ideal, or "entirely satisfactory," level, the fact that its existing capabilities have been judged adequate by FEMA should be sufficient to avoid a deficient rating.

**Response to Deficiency 2 (Also addresses Recommendation 8)**

The cited deficiency has been eliminated by BG&E's construction of a new offsite EOF. It is not the responsibility of the State to provide an acceptable EOF. Therefore, this criticism should be addressed to BG&E via the NRC review of its emergency plan.

**Response to Deficiency 3 (Also addresses Recommendation 10)**

The MEM&CDA liaison at the EOF is not relied upon to provide primary notification of utility proposed protective actions. The incorrect information was not acted on because the correct information was provided via the ring-down line, as called for in the appropriate procedures. Nonetheless, training for MEM&CDA personnel staffing this position will appropriately emphasize this individual's role as a resource for the State EOC Director and State Onsite Technical Representative.

**Response to Deficiency 4 (Also addresses Recommendation 12)**

Press releases from the Joint Media Center (JMC) concerning evacuation orders were slowed or not issued during the early stages of the exercise, due to the fact that the JMC cannot be fully staffed until approximately 1 1/2 to 2 hours after declaration of a Site Emergency. During this 1 1/2 to 2 hour period, when Public Information representatives are en route to the FMC, the Counties will accept responsibility for issuing press releases and will emphasize this during annual training. The Counties performed this function during the exercise through the information provided via EBS.

This issue will be further analyzed to determine if the need exists for an interim State PIO to be positioned in the State EOC during the initial phase of an emergency.

**Response to Deficiency 5 (Also addresses Recommendations 14 and 15)**

Training is underway in Dorchester County to refresh emergency workers in the proper use of dosimetry and record keeping. Frequent reading of dosimeters is being stressed.

In the belief that this deficiency arose from a misunderstanding regarding the extent of simulation allowed, FEMA observers should define acceptable levels of simulation prior to the exercise.



Response to Deficiency 6 (Also addresses Recommendations 17 and 18)

Training will be provided to Mass Care Center staff emphasizing general responsibilities and decontamination procedures.

Observer comments contained in the report (p. 23) seem to contradict what is stated in this deficiency. The comments state, "...assigned personnel (at the mass care center) were both willing and capable..." and, "... (monitoring) teams were very knowledgeable of procedures and equipment used to check for contamination." In view of the fact that decontamination was not demonstrated, in accordance with scenario data, we wonder what qualifies the statement that the staff did not possess adequate knowledge of the decontamination procedures (recommendation 18).

Response to Deficiency 7 (Also addresses Recommendations 16 and 19)

Training will be provided to the St. Mary's County Health Department emphasizing proper issuance of dosimetry and dose record forms. Responsible personnel will be reacquainted with procedures calling for dissemination of instructions and radiological conditions to State Police and Sheriff's Department personnel prior to and during field operations.

This deficiency occurred as a result of a misunderstanding by Sheriff's Department personnel that they could simulate their actions. Dose record forms were not picked up by participants at one point due to new personnel issuing dosimetry without sufficient turnover from the relieved personnel.

Response to Deficiency 8 (Also addresses Recommendations 2, 20 and 22)

Information exchange procedures are being analyzed to determine where the information sharing broke down. All personnel through annual training will be reacquainted with information exchange procedures. At times when this vital information is not provided to the Counties, the Counties will make prudent, independent decisions. If field monitoring data is not provided to the Counties by the State, then the Counties should not be faulted for attempting to get this information on their own.

Supportive statements for this deficiency and recommendation 22 are inconsistent with observations in other counties. Recommendation 22 states that, "... no arrangements were made for a simultaneous siren sounding in all three risk Counties". This contradicts what is stated in the Dorchester County observations where it states, "...after contacting the other Counties in the EPZ it was decided that the sirens would be activated at General Emergency only and simultaneously with the other Counties."

**Response to Deficiency 9 (Also addresses Recommendation 23)**

As was stated in the response to Deficiency 4, this issue will be analyzed to determine Public Information responsibilities during the initial stages of an emergency when the Joint Media Center has not been staffed. St. Mary's County has held a meeting/training session with their PIO to address this situation.

**Response to Deficiency 10 (Also addresses Recommendation 24)**

St. Mary's County has attempted to compile a list of mobility-impaired people through Fire Departments, County Health Department, Social Services, and Board of Education. At present, no mobility-impaired people have been identified. The County has given their best effort to identify these people. To assist in this effort Baltimore Gas and Electric Company will include in the public information annual mail out, a post card soliciting response from mobility-impaired people.

**Response to Deficiency 11 (Also addresses Recommendation 25)**

The observation, resulting in this deficiency, occurred approximately 2 hours after the exercise was declared terminated. At the time, there was no concern for decontamination due to personnel no longer playing their roles. Additionally, the EOC does have decontamination capability.

St. Mary's County will set up the decontamination facility in future exercises. Set up involves positioning barricades and barrels in the facility for contamination control. In future exercises, the FEMA observer should specify when play-acting can be terminated if the exercise termination does not relieve players from their roles.

**Response to Deficiency 12 (Also addresses Recommendation 27)**

Subsequent to the exercise, the Calvert County Civil Defense Director delegated responsibility for mobility-impaired personnel evacuation to the County Transportation Department representative in the EOC. This should preclude recurrence of this problem.

**Response to Deficiency 13 (Also addresses Recommendation 34)**

This deficiency resulted from a change in County operations during the exercise. Responsibility for dissemination of information to the field monitoring teams has been returned to the County Radiological Defense Officer (RDO) following the experiment during the exercise. The RDO has been trained to perform this function.

The following comments are addressed to the recommendations not referenced in the summary listing of deficiencies.

#### **Response to Recommendation 1**

The speaker phone in the State EOC was installed by Baltimore Gas and Electric Company (BG&E). The desire to have increased volume capability has been expressed to the utility. The situation is to be studied.

#### **Response to Recommendation 3**

Pre-fabricated messages exist in each County Plan. Consideration of their use has always occurred. The root-cause of the problem, to which this recommendation is directed, is addressed in the response to deficiency 4.

#### **Response to Recommendation 5**

The State has previously demonstrated the availability and reliability of meteorological support available to the Accident Assessment Center from the Maryland Air Management Agency. This support would be utilized in an emergency; however, annual exercise is wasteful and unnecessary given the utilization in exercises of artificial meteorology.

#### **Response to Recommendation 7**

This recommendation is most appropriately addressed to BG&E. Communication and data board update within the EOF is not the responsibility of the State. The State is, however, pursuing with BG&E avenues for enhanced communication within the EOF, particularly between utility personnel and the State Onsite Technical Representative.

#### **Response to Recommendation 11**

Milk has not been sampled because, as pointed out in the report, it is not a significant product within the ingestion pathway of the plant.

#### **Response to Recommendation 13**

Clerical support for the Dorchester County EOC has been arranged.

#### **Response to Recommendation 21**

This recommendation would have been more appropriately addressed to the State. The response to deficiency 1 provides response to this recommendation.



#### **Response to Recommendation 26**

The problem with the dedicated telephone at St. Mary's County EOC has been reported to Baltimore Gas and Electric Company and corrected.

#### **Response to Recommendation 28**

This recommendation states that information flow was adequate but suggests an improvement in striving for the ideal. All such suggestions will be considered. The Calvert County Civil Defense Director is aware of this recommendation and will attempt to implement in future exercises.

#### **Response to Recommendation 29**

Annual training will emphasize frequency of dosimeter reading, dose recording and reporting, and decontamination center location.

#### **Response to Recommendation 30**

Unless an exercise is scheduled when school is not in session, decontamination procedures cannot be demonstrated at the school, due to the disruption it would create. Decontamination procedures will be demonstrated during the next exercise using decontamination facilities located elsewhere (i.e. Fire house).

#### **Response to Recommendation 31**

The Calvert County Civil Defense Director contacted the teacher at Southern Middle School and reported that the response from the students involved in the evacuation was very informative.

#### **Response to Recommendation 32**

If anyone inquired about the location of evacuation centers while stopped at an access or traffic control point, the police could simply call over their radio for this information. Nonetheless, proper briefing of police assigned to access or traffic control points will be stressed during annual training.

#### **Response to Recommendation 33**

Calvert County Civil Defense concurs with this recommendation and will attempt to exercise route alerting in some sectors during future drills.

Response to Recommendation 34 (there are two different recommendations 34) (see deficiency 13 for 1st Rec. 34)

The Calvert County PIO has a radio available for monitoring EBS broadcasts.

#### Response to Recommendation 35

As was stated in the response to recommendation 3, pre-fabricated or "canned" messages exist in each County Plan. For future exercises, as in the past, consideration will be given to use these messages in appropriate situations.

MAR 28 1984

Mr. Edwin O. Tremper  
Acting Director  
Maryland Emergency Management  
and Civil Defense Agency  
Reisterstown Rd. & Sudbrook La.  
Pikesville, MD 21208

Dear Mr. Tremper:

We have received your letter of March 13, 1984 transmitting a schedule of actions addressing the deficiencies and recommendations noted in the FEMA/RAC evaluation of the September 14, 1983 Calvert Cliffs Nuclear Power Plant exercise. We are forwarding a copy of the schedule of actions along with a copy of this letter to FEMA headquarters. Below we offer response to several of MEMSCDA's comments regarding the deficiencies and recommendations of the exercise report.

Deficiency b.1.

We concede that the language used in satisfying this deficiency is somewhat confusing. For the record we will restate it.

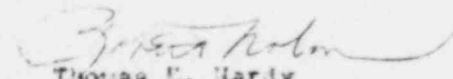
1. The performance of the State's accident assessment function on the day of the exercise was less than perfect. It rated inclusion as a "paragraph b." deficiency, that is one not indicative of a level of preparedness insufficient to provide reasonable assurance that appropriate protective actions can and will be taken to protect the health and safety of the public, but one requiring corrective action.
2. The accident assessment function, such as it was performed, was performed with assistance from the Commonwealth of Pennsylvania, assistance which is not provided for by any agreement, plan or document of which FEMA is aware.

Deficiency b.2.

By Baltimore Gas and Electric's construction of a new offsite EOF this deficiency has become a moot point. However, FEMA does not agree that this "criticism" should be addressed to BG&E via the NRC review of its emergency plan. Space allotted to state and local governments within the EOF is an offsite concern and should be addressed through the State which, as is frequently stressed by MEMSCDA, has primary responsibility for the offsite response to an accident at a nuclear power plant.

We look forward to receiving from Maryland copies of the agreements which have been negotiated with Baltimore Gas and Electric and with the Philadelphia Electric Company. We will be anxious to review these agreements and any interpretive comments that may accompany them in our efforts to secure formal approval for the State's plans in accordance with 44 CFR 350.

Sincerely,

  
Thomas E. Hardy  
for Acting Regional Director

cc:  
File  
Chron  
Samuel W. Speck, SL

J.Gavin:mct 3/21/84