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DOCKET NUMBER  
PROD & UTIL 50-322-06-3

Long Island Lighting Company  
(Shoreham Nuclear Power Station, Unit 1)  
(NRC Docket No. 50-322-EP)

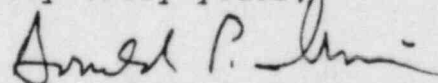
FEMA RAC Meeting on Shoreham Emergency Plan

Gentlemen:

At the request of Mr. Glass, counsel for FEMA, I forward to the Board and parties copies of three documents respecting the May 11, 1984 meeting between LILCO representatives and the RAC for FEMA Region II:

1. Meeting Notice, dated May 8, 1984
2. Summary of Draft Preliminary Responses to Consolidated RAC Review of LILCO Transition Plan for Shoreham, dated 5/10/84
3. Attendance list, May 11, 1984

Very truly yours,



Donald P. Irwin  
One of Counsel for  
Long Island Lighting Company

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Enclosures

cc w/Enclosures: Attached Service List

DS03



# Federal Emergency Management Agency

Region II

26 Federal Plaza

New York, New York 10278

May 8, 1984

## M E E T I N G   N O T I C E

SUBJECT:    MAY 11, 1984 MEETING OF FEMA, REGION II  
             REGIONAL ASSISTANCE COMMITTEE (RAC)  
             WITH LONG ISLAND LIGHTING COMPANY (LILCO)

LOCATION:    26 Federal Plaza  
             New York, N.Y. 10278  
             Room 305 B (Third Floor)

DATE:       May 11, 1984

TIME:       10:00 AM

PURPOSE:    The purpose of this meeting is to provide LILCO the opportunity to receive clarification on the RAC plan review of the LILCO Transition Plan, Revision III for Shoreham. Any questions from LILCO will be limited to the RAC comments as they relate to the Planning Standards contained in NUREG-0654. This meeting will not result in any approvals, conditional or otherwise, of any new material presented. The formal review of any new materials must follow the normal procedure of submittal by NRC to FEMA pursuant to the terms of the NRC/FEMA Memorandum of Understanding. The RAC will not entertain any questions from other parties than LILCO. If time will allow, other parties may present their points of view from 3:00 PM to 4:00 PM.

The meeting will adjourn at 4:00 PM.

SUMMARY OF DRAFT PRELIMINARY RESPONSES TO CONSOLIDATED RAC REVIEW  
OF LILCO TRANSITION PLAN FOR SHOREHAM

Enclosure 2

Items Graded Inadequate

5/10/84  
Page 1 of 12

<u>Item No.</u>	<u>RAC Comment</u>	<u>Resolution</u>	<u>Pages of Plan/Proc. Affected</u>
A.1.a.(1)	The plan does not address what support New York State will provide in a radiological emergency in Suffolk County when LILCO's resources are exhausted.	A description of the types of support New York State may provide to LERO, should they elect to do so, has been incorporated in the plan.	Plan p. 1.4-2
(2)	If New York State is likely to respond, provision for interface with the LERO decision process should be included.	New York State has continuous access to emergency information at Shoreham via the Radiological Emergency Communications System (RECS) which connects all nuclear facilities in the state with state officials. Via the RECS line and commercial telephone lines, they would interface with the Brentwood EOC.	Plan p. 1.4-2
(3)	The plan should also address federal agencies (other than DOE, FAA, and USCG) in terms of their role in response.	A description of the support which federal agencies such as NRC, FEMA, EPA, USDA and DOT may provide has been incorporated.	Plan pg. 2.2-4 to 2.2-4f
(4)	The NRC will assign a liaison to the local EOC as well, and will require at least two commercial telephone lines and at least two telephone instruments.	The NRC has been allocated space in the local EOC as well as two telephone lines and equipment.	Plan Figures: 4.1.1 to 4.1.3 OPIP 4.1.1 Att. 1
A.1.b.(1)	The concept of operations and relationship of each organization to the total emergency response effort is vague. Specifically, the relationship of all organizations/positions (e.g., hospitals, ambulance personnel, facilities to be used as relocation centers, outside consultants and federal agencies such as FAA, EPA and USDA) to LERO and the implied lines of responsibilities should be described in the concept of operations.	The relationship of all the organizations is detailed in Chapter 2, 3 and Appendix A of the plan. The NUREG cross reference has been expanded to identify all applicable sections.	Plan p. xiii
(2)	Local Law Enforcement and Fire Departments are listed as Support Organizations with primary responsibility, yet on page 2.2-4 there is no clear statement that these organizations will participate. The role of Suffolk County, should it elect to respond, should be specifically detailed as in Procedure OPIP 3.6.3 (Traffic Control) page 8.	OPIP 3.6.3 has been revised to incorporate Suffolk County police department in the traffic control function, should they decide to assist LERO in an evacuation. The plan has been similarly revised in Section 3.6. Due to the difficulty of incorporating fire and rescue departments into the emergency response on an ad-hoc basis, the plan does not anticipate their involvement.	Plan p. 3.6-6 OPIP 3.6.3 Section 5.1.3 5.3.9 5.4.13 Attachment 14

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
A.1.c.(1)	In Figure 2.2.1, the block diagram assumes that New York State and Suffolk County will communicate with LERO.	Both New York State and Suffolk County have Radiological Emergency Communications System (RECS) lines at their disposal. These dedicated lines ring when LERO picks them up and it is assumed that New York State and Suffolk County will pick them up if they ring.	No modification
(2)	Clarification should be provided in the plan as to the role of the "outside consultant(s)" in performing the accident assessment function.	The role of an "outside consultant" as the Radiation Health Coordinator has been clarified.	Plan p.2.1-3
(3)	Figure 2.2.1 should be revised to depict missing agencies (e.g., EPA, USDA) in a clearer manner.	Figure 2.2.1 has been modified to depict all supporting federal agencies.	Figure 2.2.1
A.2.a.(1)	The responsibility for "Protective Response", required by NUREG-0654, has not been defined in the text, nor is it listed in Figure 2.1.2. The NUREG cross-reference should be revised to include as a citation for element A.2.a, Figure 3.5.2 which specifies "protective response" responsibilities.	The Director of Local Response assumes responsibility for initiating protective response actions. Figure 2.1.2 has been revised to depict such. The NUREG cross-reference was modified.	Plan p.2.1-1 Figure 2.1.2 Plan p. xiii
(2)	Section 2.1 does not distinguish between primary and support responsibilities for the response organizations.	Section 2.1 has been revised to distinguish that primary agencies are directly responsible and support agencies assist or perform one aspect of the function.	Plan p. 2.1-1
(3)	Clarification should be made to Figure 2.1.2 to show a single primary responsibility for each function.	Figure 2.1.2 has been revised to assign only one agency the primary responsibility for each function.	Figure 2.1.2
(4)	Lead, primary and support responsibilities for each agency should be specified in the "position definitions" in Procedure OPIP 2.1.1.	OPIP 2.1.1 has been revised to assign lead, primary and support responsibilities to each position described.	OPIP 2.1.1 Att. 2
(5)	FEMA has no responsibility for notifying the public during a radiological emergency.	Figure 3.3.7 has been revised removing FEMA as a responsible agency for alerting and notification.	Figure 3.3.7
A.2.b.(1)	The cited authorities (Section 1.4 of the LILCO Transition Plan) relate to the authorities of the NRC to license a plant under various degrees of emergency preparedness and compensation, rather than the police-type actions.	This is a legal authority issue to be addressed elsewhere.	No modification

Item No.	RAC Comment
A.3. (1)	No letters with Suffolk County or local agencies responsible for law enforcement, fire response or snow removal could be located in the plan. No reference to public laws requiring local agencies and services to respond could be found using the NUREG cross-reference.
(2)	The "Local Public Service Agencies" and "Local Emergency Medical Services Agencies" listed in Figure 2.1.2 should be specified.
(3)	Contracts have not as yet been finalized with the bus or ambulance suppliers.
(4)	The plan should specify the number of drivers that have been trained and licensed to respond to a radiological emergency at SNPS.
(5)	The letter of agreement from DOE on page APP-B-1 does not specify the degree of response to be provided.

Resolution	Pages of Plan/Proc. Affected
LILCO has no indication from local agencies responsible for law enforcement, fire response or snow removal that they will actively participate in this emergency plan. It is, however, expected that they will perform their normal functions without direct coordination with LILCO and since this is all that is stipulated in the plan, LILCO does not require a letter of agreement. The laws from the Suffolk County Charter detailing county responsibility for snow removal, fire safety and police actions have been added to the plan.	Plan p. 1.4-2b
Figure 2.1.2 has been revised to change the titles of Local Public Service Agencies to Local Law Enforcement Agencies and Fire Departments and Local Emergency Medical Services Agencies to Private Ambulance Companies. OPIP 3.6.5 has been amended to add two new attachments, #5 - Private Ambulance Companies and #6 - Local Law Enforcement Agencies and Fire Departments.	Figure 2.1.2 OPIP 3.6.5 Att. 5 and 6
Contracts have been finalized with all bus and ambulance companies and will be inserted in Appendix B of the plan.	Plan Appendix B
Figure 2.1.1 identifies the number of bus drivers that are necessary to implement the evacuation plan. LILCO commits that at least this number will be trained, licensed and available. While bus drivers are presently staffed at approximately 150%, this number varies and it is inappropriate to identify in the plan.	No modification
The DOE letter attached as APP-B-1 is a standard letter of agreement used by the DOE throughout the country. LILCO has not requested that the DOE-RAP team perform any function that is outside of their normal emergency response. It is only because of their proximity to Shoreham (6 miles) that allows LILCO to expect a rapid response, with full access to all local DOE-RAP resources. This high level local response would have been made available to Suffolk County if they had participated in the emergency response.	No modification

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
(6)	Letters of agreement could not be located for the following support organizations/persons or Representative Outside Agencies (see Procedure OPIP 2.1.1, page 12)	Letters of Agreement:	
	o Stony Brook Hospital	- These letters are	No modification
	o Central Suffolk Hospital	being pursued.	
	o SUNY Stony Brook	- Letters with relocation	No modification
	o BOCES Central Islip	centers are obtained	
	o SCCC Selden	and maintained by ARC.	
	o Local law enforcement agencies	- These agencies perform only their	No modification
	o Local fire departments	normal function and are not relied	
	o Local snow removal organizations	upon to support the emergency response.	
	o Federal Aviation Administration		
	o Laboratories which provide environmental sample analysis	- A letter of understanding with the	Plan Appendix B
	o Radiological Health Coordinator (outside consultant)	FAA has been obtained and included	
	o Relocation center coordinator	in Appendix B.	
	o Nursing support		
	o Counselling coordinator		
	o Support organizations which provide laboratory and environmental sample analysis		
		o Laboratories which provide sample analysis	No modification
		- This support is provided either by DOE at Brookhaven Laboratory, with which a LOA exists, or through SNPS which maintains laboratories under contract.	
		o Radiation Health Coordinator	Plan Appendix B
		- See Impell Contract	
		o Relocation Center Coordinator	No modification
		- These are ARC personnel.	
		LILCO has a LOA with	
		o Nursing Support	
		ARC not their personnel.	
		o Counselling Coordinator	
(7)	The resources LERO expects to use to support the federal responses which are identified in Attachment 3.11.1 should be supported by letters of agreement from those organizations.	It is not necessary for LILCO to obtain Letters of Agreement with this multitude businesses such as restaurants and hotels to ensure the availability of their services to support an emergency response.	No modification
C.I.c.	LERO has not specified what resources have been identified by federal agencies to support their effort.	Federal agencies will receive resources primarily through the DOE at Brookhaven. Any subsequent support will be provided by LERO and LILCO's extensive array of resources.	Plan p. 2.2-4



Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
C.4	Written letters of agreement are incomplete.	See A.3	No modification
F.1.c.	The plan does not provide for direct notification by LERO of other federal emergency response organizations in the event that direct support is to be requested from those organizations.	OPIP 3.3.2 has been revised to provide for LERO's notification of other federal agencies such as NRC, FDA, etc.	Plan p.2.2-4 Figure 3.3.4 OPIP 3.3.2 Sections 5.3.3(a) Attachment 4A
	In addition to DOE, USCG, and FAA, communications with other Federal support agencies should be arranged, i.e., NRC, FDA, EPA, etc.		
I.8. (1)	The plan does not specify whether LERO has accident assessment personnel who can weigh the plant's status from an operational view in developing protective action recommendations.	OPIP 3.6.1 has been revised to assign a Nuclear Engineer the responsibility of evaluating if protective actions are necessary based on potential degradation of plant conditions.	OPIP 3.6.1 Section 2.2 OPIP 2.1.1 page 12b Attachment 3
(2)	The plan does not specify how protective action decisions would be made in the absence of an actual release. The plan should specify that protective actions such as sheltering, and especially evacuation, could be implemented prior to initiation of significant releases, if possible.	This information is now provided in OPIP 3.6.1 which has been revised to incorporate pre-determined protective actions based on plant conditions.	OPIP 3.6.1 Section 5.0 Attachment 5 and 6
(3)	The NUREG-0654 cross-reference should be revised to include the following citations for element I.8:	The NUREG-0654 cross reference has been modified as necessary.	Plan p. xv
	o Section 2.1, Figure 2.1.1, page 2 of 4		
	o Section 2.2, Attachment 2.2.1		
	o Section 4.4, page 4.4-3 (means of transportation for field teams).		
I.9 (1)	The methodology shown in Procedure OPIP 3.5.1 (see Section 5.3.7b) would not give accurate results for most accident conditions.	Section 5.3.7b has been revised to read, "the canister is not acceptable for use if the moisture check dot is pink."	OPIP 3.5.1 Section 5.3.7b
(2)	Even without core damage, radioiodine may be collected on the particulate filter if the iodine is in elemental form. Therefore, one cannot rule out activity on the particulate filter as not being iodine.	The note in OPIP 3.5.2 Section 5.6.7, stating that the filter need not be measured unless there has been fuel or core damage, has been removed. Thus, activity on the particulate filter will be measured in all cases.	OPIP 3.5.2 Section 5.6.7 Att. 9

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
(3)	The nomogram which relates iodine to total fission products for the calculation of thyroid dose (OPIP 3.5.2, Att. 11) may not be realistic in this aspect. The amount of fission products collected from a core damage accident are highly dependent on a number of parameters such as moisture in containment, filtration of release, distance from the site, etc., and are not easily amendable to the nomogram assumptions.	An explanation of OPIP 3.5.2 and the assumptions used for the mix and decay of radionuclides released has been inserted into this section.	Plan p. 3.5-2
(4)	The heading of attachments 5 and 6 Procedure OPIP 3.5.2 should be changed to read "Multiply results by 10E-6."	The referenced attachments have been removed and incorporated into the computerized procedure.	OPIP 3.5.2
I.10 (1)	Procedure OPIP 3.5.2 is lacking several nomograms which are required for the calculations.	The referenced nomograms have been incorporated into the computerized procedure.	OPIP 3.5.2 Section 5.2
(2)	The plan should include provisions for the consideration of plant parameters regarding types of releases. Reliance on the stated 0.05 m/sec. deposition velocity is applicable under a limited set of atmospheric conditions, and should not be relied upon as LERO's only means of ingestion pathway zone protective action decisions. Field surveys with HP210 detectors can quickly determine ground deposition.	The plan has been revised to explain that OPIP 3.5.3 uses a conservative (high) deposition velocity to ensure that areas of concern are identified so that field teams may be sent for further investigation or protective actions may be implemented. In addition OPIP 3.5.1 has been modified to include a ground deposition survey with an H.P. 210.	Plan p. 3.5-3 OPIP 3.5.1 Section 5.3.6 (d)
(3)	The NUREG-0654 cross-reference should be revised to also include Procedure OPIP 3.6.1 as a citation for element I.10.	The NUREG-0654 cross-reference has been modified.	Plan p. xv
J.2 (1)	There is no discussion of alternative routes that are to be used for inclement weather and specific radiological conditions.	The evacuation route for site evacuees is the same regardless of whether the public is evacuating or if there is inclement weather. The destination, however, may vary. Site personnel may be instructed to go home or to the Wildwood substation. If these are uninhabitable, Riverhead or Pt. Jefferson district offices may be used.	Plan p. 3.6-8b
(2)	The plan should include a discussion of transportation to be used by SNPS site personnel.	Site evacuees will use their personal vehicles.	Plan p. 3.6-8b
J.9 (1)	There is no discussion of how protective actions would be implemented based on plant conditions prior to actual releases (see comment for element I.8).	See I.8(1)	OPIP 3.6.1 Section 2.1, 5.0 Att. 5 and 6
(2)	Tables 3.6.2 and 3.6.3 are taken from the FDA draft report, and are not the final values.	The referenced tables have been removed from the plan. The updated tables are in OPIP 3.6.6.	Plan p.3.6-3 Tables 3.6.2, 3.6.3



Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected										
(3)	The NUREG-0654 cross-reference should be revised to include Table 3.6.1 as a citation for element J.9.	The NUREG-0654 cross-reference has been modified.	Plan p. xvi										
J.10.b(1)	The map in Figure 3 of Appendix A does not show subarea boundaries for evacuation areas F (F1-F5) or K (K1-K5).	The subareas (F1-F5) and (K1-K5) would never be evacuated independently and thus do not require demarcation on Figure 3.	No modification										
(2)	Population numbers should be stated for each ERPA. A map(s) showing population distribution has not been included in the plan.	A map has been added to the plan which shows the population for each ERPA.	Appendix A, Sec. III Figure 7.1										
J.10.c(1)	Procedure OPIP 3.6.2 states that distribution will be accomplished by directing emergency workers to a distribution location. This may require recalling emergency workers from the field and a time delay in administering KI to them.	The plan has been revised to provide KI to emergency workers at their staging areas before going into the field.	Plan p. 3.6-5 OPIP 3.6.2 Section 5.1.c										
(2)	At the present time, there is no KI available which is not beyond the labeled expiration date, however, FDA has granted extensions for its use. The procedures should reflect FDA extensions.	The KI tablets purchased by LILCO have a marked expiration date of June 1985. The validity of this date was verified by telephone conversation with the manufacturer. The extension of shelf life referred to in the FEMA comment is no longer applicable to any existing KI tablets.	No modification										
J.10.h	There is no legend on Figure 9, Zone A (page IV-76, Appendix A) defining the designators for SUNY, SOCC and BOCES as relocation centers. However, it has been estimated that only the BOCES relocation center is at least five miles beyond the 10-mile EPZ.	<p>The American Red Cross of Suffolk County has informed LILCO that the following locations would serve as the primary relocations centers:</p> <table><tr><th>Center</th><th>Approx. Distance from SNPS</th></tr><tr><td>St. Joseph's College</td><td>16 miles</td></tr><tr><td>BOCES - Islip</td><td>20 miles</td></tr><tr><td>Dowling College</td><td>21 miles</td></tr><tr><td>SUNY Farmingdale</td><td>32 miles</td></tr></table> <p>Additional locations would be activated as the need became apparent.</p>	Center	Approx. Distance from SNPS	St. Joseph's College	16 miles	BOCES - Islip	20 miles	Dowling College	21 miles	SUNY Farmingdale	32 miles	Plan p.4.2-1,3,4 Figure 4.2.1 Note: Additional changes will be made in the procedures and Appendix A.
Center	Approx. Distance from SNPS												
St. Joseph's College	16 miles												
BOCES - Islip	20 miles												
Dowling College	21 miles												
SUNY Farmingdale	32 miles												
J.10.k(1)	Pre-emergency planning for snow removal on the evacuation routes be further developed to include administrative procedures, SOPs, etc.	The snow removal efforts provided under public law, referred to in the plan are not coordinated with the emergency response. Except in emergency scenarios having very long lead times, the time required in a severe snow storm to clear all the extensive side streets and driveways would be too long to be meaningful assistance, LERO would thus be recommending a protective action of sheltering in most cases regardless of the availability of snow removal services.	No modification										
(2)	The NUREG cross-reference should list Procedure OPIP 3.6.3 as a citation for element J.10.k.	The NUREG-0654 cross-reference has been modified.	Plan p. xvi										

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
J.10.m(1)	The plan does not specify whether LENO has accident assessment personnel who can weigh the plant's status from an operational view in developing protective action recommendations (see comment I.8).	See I.8(1)	OPIP 2.1.1 Att. 2 and 3
(2)	The off-site conditions (non-radiological) are not specifically addressed, in that the Evacuation Coordinator, who should have information regarding any off-site constraints to protective actions, is not involved in the decisions.	Non-radiological information such as road conditions will be provided to protective action decision-making by the Evacuation Coordinator.	Plan p. 3.6-4 OPIP 3.6.1 Section 2.5 5.1.14 5.2.7
(3)	The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.6.1 as a citation for element J.10.m.	The NUREG-0654 cross-reference has been modified.	Plan p. xvi
J.11 (1)	The inclusion of Rhode Island within the 50-mile EPZ should be reevaluated, since Rhode Island was included in a previous revision (see comment for criteria element F.1.b).	Rhode Island is over 50 miles from the site and therefore not included in the 50 mile EPZ.	No modification
(2)	The plan is not specific for imposing protective procedures such as impoundment decontamination, processing, decay, product diversion, and preservation.	The Shoreham 50 mile EPZ extends into Connecticut and New York. LILCO has a letter from Connecticut which indicates they will provide an ingestion pathway emergency response, within their boundaries, upon notification by a licensee. Within New York State, the primary means of food interdiction will be radio messages identifying areas of concern and offers to compensate anyone with economic losses due to food being withheld from market. In addition, aid may be requested from the USDA, EPA and DOC to assist in food interdiction in accordance with their responsibilities under the Federal Master Plan.	Plan p. 3.6-8a
(3)	There are no maps referenced for recording survey and monitoring data, key land use data, diaries, food processing plants, water sheds, etc. If LILCO has access to the State maps, this should be referenced in the plan.	The plan has been revised to incorporate references to tables listing dairies, farms and food processing plants which have been inserted in OPIP 3.6.6 and maps of the 50 mile EPZ which are housed at the EOC.	Plan p. 3.6-8a OPIP 3.6.6 Section 5.1.1.2 5.1.2.3 5.1.3 5.4 5.4.1

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
(4)	There are also no lists of food processing facilities located outside the 50 mile EPZ, which process food originating within the 50 mile EPZ.	In the New York metropolitan area, virtually all food flows towards New York City. Thus, is it unlikely that any food processing outside the EPZ would take food from inside and send it further away. The list of food processors, however, does identify facilities as far as 70 miles from SNPS to ensure that all potentially contaminated food is contained.	OPIP 3.6.6 Att. 9 through 16
J.12 (1)	The number of decontamination kits available, and their place of storage at each location could not be located in the plan.	The monitoring and decontamination equipment will be stored at relocation centers.	Plan p. 4.2-4
(2)	Based on a review of the equipment inventory listed in the plan, it is questionable whether the number of potential relocatees could be monitored within 12 hours.	The plan calls for a total of 90 radiation monitoring persons to be deployed to relocation centers. Assuming 2 minutes or less to monitor an individual, approximately 32,400 people could be processed in 12 hours. This is more than the 20% of the EPZ population for which relocation center capacity is established, even in a worst case, full 10 mile evacuation.	No modification
(3)	The procedures should describe clearly understood measures which, to the greatest extent practicable, minimize the likelihood for potentially contaminated persons to gain access to a relocation center where evacuees are to be housed, fed and cared for.	OPIP 3.9.2 has been revised to clarify that only evacuees with a "clean" tag may enter a relocation center.	OPIP 3.9.2 Section 5.9
(4)	More information is needed on the Red Cross responsibilities and procedures at the centers.	The American Red Cross procedures for operating relocation centers are detailed in ARC 3050 "Disaster Services Regulations and Procedures, Disaster Health Services". This is a public document which need not be reproduced in the LERO plan.	Plan p. 2.2-1
(5)	There are no registration forms (other than exposure) supplied with the plan.	The registration forms are supplied by the American Red Cross and for the reason cited in J.12(4) not included in the LERO plan.	No modification
(6)	There should be procedures for completing registration forms for non-contaminated individuals.	The procedure has been revised to provide that non-contaminated individuals sign out on a "clean" Emergency Worker/Evacuee Monitoring Record Form before proceeding to an ARC relocation center for registration there.	OPIP 3.9.2 Section 5.9
(7)	The procedures should also specify where evacuee monitoring records will ultimately be maintained.	OPIP 3.9.2 has been revised to include that evacuee monitoring records are kept at the equipment storage areas until moved to the EOC for permanent storage.	OPIP 3.9.2 Section 5.1.7
(8)	The available equipment shown for monitoring evacuees may not be sufficient to meet the 12-hour time limit within which all evacuees arriving at relocation centers must be monitored.	See J.12 (2)	No modification

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
(9)	The NUREG-0654 cross-reference should be revised to include Procedure 4.2.1 as a citation for element J.12.	The NUREG-0654 cross-reference has been modified.	Plan p. xvi
K.3.a (1)	The inventory lists in OPIP 5.3.1 show that insufficient numbers of chargers are available. The plan should clarify whether dosimeter charges will be issued to each emergency worker, or whether dosimeters will be zeroed and distributed at the emergency worker staging areas.	The dosimeter chargers are shared by the emergency workers to zero their dosimeters at the staging areas. The chargers are not taken into the field.	Plan p. 3.9-2
K.5.a (1)	For all open window readings, CPM should be used, rather than mr/hr.	CPM values have been incorporated for all open window readings.	Table 3.9.1
(2)	The data in Procedure OPIP 3.9.2 do not correspond to the listings in Table 3.9.1 for skin, hair, clothing, and vehicles.	The data in OPIP 3.9.2 and Table 3.9.1 have been made consistent.	OPIP 3.9.2 Att. 7
(3)	The threshold for decontamination in Table 3.9.1, and the values for release shown in Table 3.9.2 do not agree. Table 3.9.2 gives the NRC surface contamination levels for decommissioning nuclear power plants, which are too low for practical application under emergency conditions.	The values for decontamination found in Table 3.9.2 and OPIP 3.10.1 are for general area, ground and building surfaces. LILCO has been unable to find official documentation of allowable levels other than Reg. Guide 1.86. If FEMA will provide officially acceptable levels other than these, LILCO will replace the ones presently used.	No modification
K.5.b (1)	The correct thyroid contamination number should be identified and used consistently.	OPIP 3.9.2 uses only .13 mR or 150 CPM as a thyroid contamination limit.	No modification
(2)	The HP 270 probe identified in Procedure OPIP 3.9.2, Section 5.5.1a is unable to detect alpha activity.	The referenced procedures does not provide for the means to measure alpha particle activity because none of the isotopes of interest are uniquely alpha emitters and thus would be identified via beta-gamma measurements.	No modification
(3)	Radiological decontamination equipment, supplies, and storage and disposal capability for contaminated waste associated with the decontamination process could not be located in the plan or procedures.	OPIP 3.9.2 has been modified to include provisions for transferring radioactive wastes to the Shoreham site for disposal.	OPIP 3.9.2 Section 5.1.8
(4)	Monitoring equipment including lists of supplies used for decontamination at the decontamination centers should be itemized, as well as quantities available.	The decontamination equipment inventory lists is contained in OPIP 5.3.1. The list identifies total equipment available for all relocation centers. This table is now referenced in the plan.	Plan p. 4.2-4
(5)	No indication of first aid administration or available kits could be found in the plan or procedures.	LERO emergency workers are neither trained in first aid nor expected to provide such assistance. Thus, there is no first aid equipment provided in their kits.	No modification

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
L.1. (1)	The capability/expertise of medical facilities and personnel at Stony Brook Hospital and Central Suffolk Hospital that will be used to evaluate radiation uptakes and exposures should be described. No indication that personnel from these hospitals are prepared to handle contaminated individuals could be found in the plan.	A letter of agreement stipulating the facilities and capabilities of these hospitals is being pursued.	No modification
L.3. (1)	Procedure OPIP 4.2.2 contains a list of hospitals capable of treating contaminated injured individuals; however, the listing does not include their capacity and any special radiological capabilities.	A new listing of hospitals which can treat contaminated/injured individuals with the number of beds and personnel has been incorporated in OPIP 4.2.2.	OPIP 4.2.2 Attachment 1
(2)	Procedure OPIP 4.2.2 should be referred to in Section 3.7, to ensure that the LERO Health Services Coordinator and staff are aware of these additional resources in the event they are needed.	OPIP 4.2.2 is now referenced in plan section 3.7	Plan p. 3.7-1
M.1. (1)	Attachment 3.10.1 and Section 3.10 (Recovery/Re-entry) give no consideration to plant conditions, such as the probability of additional significant releases, continuing or intermittent low level releases, etc.	There is no Attachment 3.10.1. It is assumed that item M.1(3) below addresses this concern.	No modification
(2)	Attachment 3.10.1 refers to acceptable levels for unrestricted release of property during a decommissioning of a facility (per Reg. Guide 1.86) and are not related to recovery from an emergency.	See K.5.a(3)	No modification
(3)	Procedure OPIP 3.10.1 notes that the plant must be stable, no significant releases occurring, etc. as precautions for entering Recovery. However, there is no indication of who determines whether these conditions have been satisfied.	OPIP 3.10.1 has been revised to include a Nuclear Engineer in the Recovery Action Committee who will review the plant status and ensure that the plant is stable, etc....	OPIP 3.10.1 Sections 5.1.1, 5.2 and 5.3.1
(4)	An evacuation is not necessarily a prerequisite for recovery.	Evacuation has been removed as a prerequisite for recovery from OPIP 3.10.1.	OPIP 3.10.1 Sections 4.1 & 4.4
(5)	It should be indicated in Section 3.11 that post-emergency phase activities are a responsibility of EPA as per the FRMAP.	EPA has been identified as the lead federal agency for long term operations.	Plan p. 3.11-1
M.4	The plan should establish a method for estimating total population exposure, not merely state that an organization will be established for this purpose.	A procedure has been developed to calculate total population exposure and is referenced in Section 3.10 of the plan.	Plan p. 3.10-2 OPIP 3.10.2
O.1.b.	Training should be offered to "all local law enforcement agencies and fire departments within the 10-mile EPZ," which are anticipated to carry out their normal emergency response functions during a radiological emergency at SNPS.	Local law enforcement agencies, fire departments and snow removal agencies will be offered overview emergency response and radiation fundamentals training.	OPIP 5.1.1 Section 5.1.3.4

Item No.	RAC Comment	Resolution	Pages of Plan/Proc. Affected
0.4.b.	No provision has been included for training of Radiological Health Managers, nor for anyone in LERO, to evaluate the implication of plant conditions in protective action recommendations.	The plan now makes provisions for training personnel who will fill the positions of Radiation Health Coordinators and Nuclear Engineer in this area. This training will orient these persons to the details of the procedures that they will need to implement. LERO will not, however, be providing technical training in areas these persons are already qualified.	Plan p. 5.1-7 Figure 5.1.1 & 5.2.1
0.4.d.	Police, security and fire fighting personnel are to be filled by personnel with whom LILCO/LERO does not have a mutual aid agreement supported by a letter of agreement.	See A.3.(6)	No modification
P.8. (1)	The cross-reference should be revised to include the citations that are not indexed as noted in the above comments.	The NUREG-0654 cross-reference has been modified, as identified above.	Plan p. xiii to xviii
(2)	The applicability of the following references to the NUREG-0654 criteria elements listed below should be clarified, or these references should be deleted from the NUREG-0654 cross-reference submitted with the plan.	The NUREG-0654 cross-reference has been modified, as appropriate.	Plan p. xiii to xviii
NUREG-0654			
	<u>Element</u>	<u>Reference Cited in Plan</u>	
	C.2.a	Section 3.11 - attachment 3.11.1	
	J.10.h	Appendix A - Fig. 9 Zone A	
	J.10.j	Procedure OPIP 3.3.2	



Items Graded Adequate  
Provided the Necessary Revisions Are Made to Maintain Their Adequacy

5/10/84

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<u>Item No.</u>	<u>RAC Comment</u>	<u>Resolution</u>	<u>Pages of Plan/ Proc. Affected</u>
A.1.d	The specific individual(s) who will perform the responsibilities of the Radiation Health Coordinator is identified by title and affiliation.	NUREG cross-reference has been modified to reference the IMPELL Corporation contract with LILCO under which the services of the Radiation Health Coordinator and the Nuclear Engineer are provided.	Plan p. xiii
C.1.b.	Specific resources and expected times of arrival are identified for the U.S. Coast Guard (see section 2.2, page 2.2-2). Any additional federal resources, including expected times of arrival to be furnished through the FRERP (see Section 3.11, page 3.11-1) or other arrangements, should also be specified (e.g., EPA, NRC, USDA).	A new attachment has been added to Section 2 of the plan which provide the response time and mobilization locations for the federal support agencies including EPA, NRC, USDA and others.	Plan p. 2.2-1 Attachment 2.2.2
E.1	The notification list of persons/groups/organizations to be notified at general emergency is added to the plan.	Figure 3.3.4 has been revised to serve as the notification list for both a Site Area emergency and a General emergency	Plan Figure 3.3.4
E.5	For clarity, the system developed by LERO should use different nomenclature to distinguish it from the FCC sanctioned EBS system.	In accordance with 47CFR§73.935 and §73.937 "This EBS may be activated...at management's discretion, in connection with day to day emergency situations posing a threat to the safety of life and property". Thus, it is within the bounds of EBS regulations for LILCO to request the radio station management to activate the EBS system. This would not require the involvement of any government official.	No modification
F.1.b	Arrangements are established for communications with Rhode Island.	No portion of the State of Rhode Island is within 50 miles of the Shoreham Nuclear Power Station. Consequently, there is no plan to include Rhode Island in the planning process.	No modification
F.1.e	The notification list of persons/groups/organizations to be notified at general emergency is added to the plan.	See E.1	Plan Figure 3.3.4
F.3	The LILCO Nuclear Operations Support Department Procedures contain the required frequency of siren tests.	The plan has been modified to include the frequency of siren test as provided in the LILCO procedures.	Plan p. 3.4-7
H.4 (1)	The Radiation Health Coordinator should be included in the emergency call checklists in Procedure OPIP 3.3.2.	OPIP 3.3.2, Attachment 2 has been revised to include the notification of the Radiation Health Coordinator and the Nuclear Engineer.	OPIP 3.3.2 Attachment 2
(2)	Per analysis comment E.1 and F.1.e, Figure 3.3.4 does not include a list of persons/groups/organizations to be notified for mobilization at general emergency.	See E.1	Plan Figure 3.3.4

Item No.	RAC Comment	Resolution	Pages of Plan/ Proc. Affected
(3)	The plan and Procedure OPIP 4.1.1 appear to be contradictory. It is not necessary to delay notifications to the EOF and New York State until full activation of the local EOC is completed (as stated in Section 4.1.A of the plan). Procedure OPIP 4.1.1, Section 5.2 indicates that the Director of Local Response will make these notifications upon arrival at the local EOC, Section 4.1.A of the plan should be changed to agree with the implementing procedure.	The notifications of the EOF and New York State are not delayed until the local EOC is activated. They are initially notified from the site via the RECS network. As the local EOC is activated according to OPIP 4.1.1, the EOF and New York State are called by the Director of LERO to establish this new point of contact with the LERO organization. The plan has been revised to clarify this.	Plan p. 4.1-1
H.7	Clarification of ownership and responsibility for maintenance of the ORS kit are specified.	The ORS kits at Brookhaven are owned and maintained by DOE. Should additional kits be necessary, LILCO has 3 kits which they maintain in Brentwood. All radio equipment for the DOE-RAP teams is provided by DOE-RAP.	Plan p.3.5-2 and 3.5-2a Attachment 2.2.1
H.11 (1)	The equipment list on page 4.4-1 includes only one air sampler. The plan should state whether back-up samplers are available at the staging area. It should be taken into consideration that radioiodine sampling capability is lost in the event of pump failure. How does the list on page 4.4-1 relate to the list in Procedure OPIP 5.3.1, which includes multiple air samplers? Also, are there radiation meters to go with the GM detectors listed in Procedure OPIP 5.3.1 as available at the local EOC?	LILCO maintains 3 sets of backup equipment in Brentwood. The inventory list in OPIP 3.5.1 has been modified to list the equipment which is contained in one complete kit.	Plan p. 4.4-1 OPIP 3.5.1 Att. 3
(2)	Communications equipment on page 4.1-4 should include radio links between the field teams and EOC.	Radio equipment for the teams is provided by DOE-RAP. This communications link is between the field teams and the DOE-RAP team Captain who may be at either BNL or the EOC depending on radiological conditions.	Plan p.3.5-2a and p.4.1-4
I.7	Procedure OPIP 3.5.1 and the equipment list in Attachment 2.2.1 of the plan do not coincide. The plan is adequate in addressing this element provided that these two lists are reconciled.	The information provided in Attachment 2.2.1 is the equipment in the DOE-RAP team kits. The equipment in OPIP 3.5.1 is in the LILCO ORS kits.	No modification
J.10.d	The directory of non-institutionalized mobility impaired individuals has been completed.	The listing of non-institutionalized mobility impaired individuals is being placed into LILCO computers in order to expedite updating and retrieval. A sample output of this program will be provided upon completion.	No modification
J.10.f	The procedures for screening emergency workers who would be given KI are included in the plan.	The plan has been revised to describe that during training, all LERO emergency workers who might enter the EPZ are provided information on the use of KI and its side effects. If an allergy is suspected, the LERO personnel is directed to consult with his/her personal physician and to not take the KI if it is distributed.	Plan p. 3.9-1

Item No.	NAC Comment	Resolution	Pages of Plan/ Proc. Affected
J.10.g	Contracts are successfully negotiated with the bus companies providing their vehicles, and the notification call up list for transportation personnel has been completed.	Contracts with bus companies will be incorporated into Appendix B. The notification call up list is now a computer printout which will be maintained separately on a routine basis.	Plan Appendix B
L.4	The list of ambulance companies with which LERO has letters of intent supported by finalized contracts will be contained in Procedures OPIP 4.2.2.	A new attachment has been added to the procedures which provides the names of ambulance companies and the number of vehicles under contract with LERO.	OPIP 4.2.2 Attachment 2
M.2.d	It is clarified in the plan whether DOE-RAP personnel will participate in the radiological monitoring exercises. This clarification is requested since the letter of agreement between DOE and LILCO limits DOE radiological assistance to "advice and emergency action essential for the control of immediate hazards to health and safety" (i.e., in an actual emergency) - see Appendix B, page APP-B-1.	The plan has been revised to clarify that the DOE-RAP Team will participate in an annual practice exercise and the FEMA/NRC observed exercise. These supplement their own drills and exercises which are held in connection with Brookhaven National Laboratory.	Plan P. 5.2-3 Figure 5.2.1
P.4	The agreements necessary to implement the LILCO Transition Plan are included in the plan and updated annually.	All updated Letters of Agreements and contracts will be issued upon revision of the plan.	Plan Appendix B

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MAY 11, 1984 MEETING OF FEMA. REGION II  
REGIONAL ASSISTANCE COMMITTEE (RAC)  
WITH LONG ISLAND LIGHTING COMPANY (LILCO)

[illegible]



LILCO, May 15, 1984

CERTIFICATE OF SERVICE

In the Matter of  
LONG ISLAND LIGHTING COMPANY  
(Shoreham Nuclear Power Station, Unit 1)  
(Emergency Planning Proceeding) Docket No. 50-322-OL-3

I hereby certify that copies of a letter from Donald P. Irwin to James A. Laurenson, Esq., et al., dated May 15, 1984, with enclosures, were served this date upon the following by first-class mail, postage prepaid.

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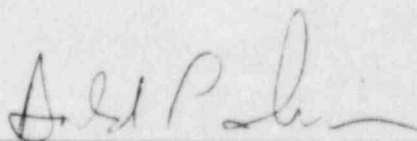
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