



Federal Emergency Management Agency

Washington, D.C. 20472

APR 26 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: *Samuel W. Krimm*
Richard W. Krimm
Assistant Associate Director
Office of Natural and Technological
Hazards Programs

SUBJECT: Final Exercise Report for the Palisades Nuclear Power
Plant Offsite Radiological Emergency Preparedness
Exercise Conducted on May 25, 1983

Attached is the final exercise report for the joint offsite radiological emergency preparedness exercise conducted on May 25, 1983, at the Palisades Nuclear Power Plant. This was a small participation exercise for the State of Michigan and Berrien County, and a full participation exercise for Allegan and Van Buren Counties. This report cites that the State of Michigan and the Counties of Allegan, Berrien and Van Buren demonstrated the capability to protect the public in the event of a radiological emergency at the Palisades Nuclear Power Plant.

Although there were deficiencies observed at the exercise, the attached response submitted by the State of Michigan adequately addresses the deficiencies. Based on the exercise and the State's schedule of corrective actions, we cannot identify any impediments to protecting the public in the event of an accident at the Palisades Nuclear Power Plant. Therefore, the approval under the Federal Emergency Management Agency Rule 44 CFR 350 will remain in effect.

If you have any questions, please contact Mr. Robert Wilkerson, Chief, Technological Hazards Division at 287-0200.

Attachment
As Stated

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PDR ADOCK 05000255
F PDR



Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

MAR 30 1984

Peter R. Basolo, Captain
Deputy State Director
Emergency Management Division
Michigan Department of State Police
111 South Capitol Avenue
Lansing, Michigan 48913

Dear Captain Basolo:

FEMA Region V Technological Hazards Branch staff have reviewed your letter of February 6, 1984, that further explains the State of Michigan's schedule of corrective actions to the May 25, 1983, Palisades Radiological Emergency Preparedness exercise. This further explanation was requested in FEMA Region V's letter of December 14, 1983. FEMA Region V's review comments are reflected below:

I. SIGNIFICANT DEFICIENCIES

A. State of Michigan

1. E-6 The State response concerning corrective action to the delay in the 15 minute Prompt Alert and Notification identified in the May 25, 1983, exercise is acceptable. This criteria item remains open pending FEMA's formal certification.

2. N.1.b. FEMA Region V takes exception to the State of Michigan's statement that FEMA Region V has not provided guidance to the State concerning REP objectives and scenario development. Numerous discussions and meetings have been held over the past several months.

The State's remark that FEMA approved the scenario prior to the exercise is incorrect. Enclosed is FEMA Region V's letter of May 4, 1983, where FEMA Region V found the scenario to be inadequate. In this letter several recommendations were, again, made for State and utility writer consideration. FEMA Region V also requested a revised scenario be provided to FEMA Region V addressing FEMA Region V's

recommendations by May 13, 1983. The revised Palisades exercise scenario was not provided by the deadline requested. Most of the recommendations were not incorporated into the actual exercise scenario. Consequently Allegan County had minimal involvement in the exercise and actually terminated their involvement 15 minutes prior to State exercise termination.

FEMA Region V is cognizant of 44 CFR, Part 351.20(J). In the absence of its implementation, the responsibility has fallen on the State and utility exercise planners.

Meetings between FEMA Region V and the State and utility scenario writers were held approximately 90-100 days prior to the Palisades exercise. Similar meetings were held within the same time frame for consequent exercises for the Big Rock Point and Donald C. Cook exercises. FEMA Region V is pleased the State plans to continue these pre-exercise meetings since improvement in exercise scenario development has been noted in the Donald C. Cook exercise scenario.

Given the State's comments in its February 6, 1984, letter outlining its schedule of corrective actions and given the actual improvement in the preparation of exercise scenarios since the Palisades exercise, FEMA Region V concludes the State of Michigan's corrective actions are acceptable.

B. Allegan County

1. J.10.1 State corrective actions are acceptable.
2. J.10.b State corrective actions are acceptable.
3. E.1, E.2, F.1.a, F.1.e, and H.4 This is a good example of how the objectives previously written by the State were confusing when applied during the exercise evaluation. FEMA Region V was impressed by the State's corrective action demonstrated in the development of objectives and the scenario and the demonstration of them at the Donald C. Cook

exercise. As a result, the State's corrective action on these criteria items is acceptable.

4. M.1. This was an exercise objective that was not fully demonstrated during the exercise. FEMA Region V accepts your suggestion that it be an objective during the next Palisades exercise. State corrective action is acceptable.

C. Berrien County

No schedule of corrective actions required.

D. Van Buren County

1. E.7. State corrective action is acceptable. FEMA Region V does encourage, though, the full activation of the Prompt Alert and Notification System to include ERS at some future exercise so the system effectiveness can be demonstrated.
2. J.10.c State corrective action is acceptable.
3. J.10.d State corrective action described in their October 18, 1983, letter and their explanation of criteria item E.7. in their February 6, 1984, letter is acceptable.
4. E.1, State corrective actions are acceptable. See
E.2, comments above for Allegan County.
E.1.a,
F.1.e,
and
H.4

II. MINOR DEFICIENCIES

FEMA Region V did not require the State of Michigan to provide a schedule of corrective actions to minor deficiencies. Since a schedule of corrective actions was submitted by Michigan, FEMA Region V has conducted an evaluation and found the schedule of corrective actions to be adequate, as reflected below.

A. State of Michigan

1. G.4.a State corrective action is acceptable.
2. H.3 State corrective action is acceptable.

3. J.10.a State corrective action is acceptable.

B. Allegan County

1. D.4 State corrective action is acceptable.
2. K.3.b State corrective action is acceptable.
3. A.4 State corrective action is acceptable.
4. F.1.d State corrective action is acceptable as described in the State's October 18, 1983, letter.
5. G.3.a State corrective action as described in the State's October 18, 1983, letter is acceptable.

C. Berrien County

No corrective actions were required.

D. Van Buren County

1. A.1.a State corrective actions as described in the State's October 18, 1983, letter of corrective actions are acceptable.
2. J.10.b State corrective action described in their February 6, 1984, letter of corrective actions is acceptable.
3. J.10.f State corrective action described in their February 6, 1984, letter (schedule of corrective actions) is acceptable.
4. K.3.b State corrective actions described in the letters of October 18, 1983, and February 6, 1984, (schedule of corrective actions) are acceptable.
5. J.10.J State corrective actions described in their letter of February 6, 1984, (schedule of corrective actions) are acceptable. FEMA Region V notes this was demonstrated rather than simulated in the Donald C. Cook exercise by Berrien County.
6. A.4 State schedule of corrective actions described in their letters of October 18, 1983, and February 6, 1984, are acceptable.

7. F.1.b State schedule of corrective actions as described in their letter of October 18, 1984, are acceptable.
8. K.3.a State schedule of corrective actions as described in their letter of October 18, 1984, are acceptable.

Sincerely,

for Dan Belmont

Wallace Weaver, Chairman
Regional Assistance Committee

Enclosures

MAY 1 1983

Captain Peter R. Basolo
Emergency Management Division
Michigan State Police, ATTN: Lt. Tyler
111 South Capitol Avenue
Lansing, Michigan 48902

Dear Captain Basolo:

The Scenario for the Palisades Nuclear Power Plant offsite exercise has been reviewed and found inadequate. At the scenario meeting of March 10, 1983, attended by FEMA a recommendation was made to have the wind going to a North or Northwesterly direction in order to invoke a full response in Allegan County as well as Van Buren County. The scenario as presented does not meet this goal.

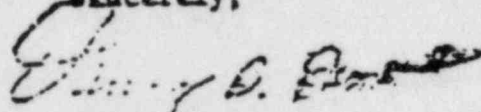
The scenario does not provide for the opening of the Joint Public Information Center (JPIC).

The scenario does not provide for any supplementary incidents to those generated by the utility that could be impediments to the movement of the population from the risk area and otherwise involve the EOC staff.

While the scenario outlines a series of activities that should be considered during Recovery and Re-entry it does not present any problems to be considered and acted upon by the EOC staffs.


In order for this exercise to be conducted as scheduled, please provide the Technological Hazards Branch, Battle Creek, with a revised scenario that addresses these deficiencies by May 13, 1983.

Sincerely,



Dan Sement
Acting Chief
Technological Hazards Branch

cc: RD
Ch/NTH


RS/TH/RAnthony/sn/x6021/5-4-83



JAMES J. BLANCHARD, GOVERNOR
DEPARTMENT OF STATE POLICE
COL. GERALD L. HOUGH, DIRECTOR

February 6, 1984

EMERGENCY MANAGEMENT DIVISION
LOWER LEVEL
111 S. CAPITOL AVENUE
LANSING, MICHIGAN 48913
PHONE: 317 373-0517

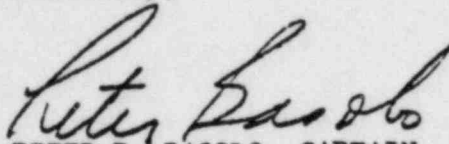
Mr. Wallace Weaver, Chairman
Regional Assistance Committee
Federal Emergency Management Agency
Region V - Chicago
300 S. Wacker Drive, 24th Floor
Chicago, Illinois 60606

Dear Mr. Weaver:

Attached is the Emergency Management Division's response to the December 14, 1983, letter from Frank Finch regarding the Palisades 1983 radiological emergency preparedness exercise.

If you have any questions, please feel free to contact this office.

Sincerely,


PETER R. BASOLO, CAPTAIN
Deputy State Director of
Emergency Services

PRB:DMS:cmh

Attachment

cc: ✓ Dan Bement, F.E.M.A. - Battle Creek

Revision #1 to the Emergency Management Division response to the Palisades radiological emergency preparedness 1983 exercise.

I. SIGNIFICANT DEFICIENCIES

A. State

1. E.6.: The original FEMA critique comment was that it took longer than 15 minutes for the state to demonstrate prompt alert and notification and that the initial message from the facility was incomplete and confusing. The state response (10-18-83) was that the delay was analyzed by the state and the utility and that changes had been initiated as of the Big Rock Point full-scale exercise (July 26, 1983). Therefore, in regards to the 15 minutes notification, the deficiency should be considered resolved.

A second issue is raised in this latest set of comments from FEMA. The response is that resolution of this deficiency is dependent on FEMA's formal review of the prompt alert notification system; therefore, the issue is not closed and is dependent on FEMA's review and evaluation of the system.

2. N.1.b.: The original FEMA comment was that the scenario was inadequate. The state response was that FEMA approved the scenario prior to the exercise. There is no guidance available from FEMA on the development or content of scenarios beyond element N.3. of NUREG-0654. All items listed in element N.3. of NUREG-0654 were provided to FEMA prior to the exercise. State requests for written guidance from FEMA on scenarios has not been answered.

Therefore, the state response was that this was not a deficiency and no correction action was necessary from the state. Rather, FEMA needs to provide written guidance to the state on scenario development and content. Also, FEMA's suggestion on page 62 of the critique for a meeting 90 to 100 days prior to the exercise to discuss exercise objectives and scenarios was implemented for the D.C. Cook radiological emergency preparedness exercise.

In 44 CFR, Part 351, 351.20(j), FEMA is charged with developing "representative scenario's from which . . . state and local governments may select for use in testing and exercising radiological emergency plans." In the absence of such scenarios or guidance, the state will continue to attempt to address FEMA's request for information on scenarios, and operate on the time table set forth in FEMA Guidance Memo 17 until new guidance is provided.

B. Allegan County

1. J.10.1.: The Allegan County Plan (page F8) establishes road blocks on both routes I-196 and A-2. More care will be taken during drills and exercise to ensure that all access control points that are manned are marked on status boards. These items will be covered in the offsite training program prior to the next exercise (August 1984).
2. J.10.b.: 1980 population figures will be incorporated into the next update of the Allegan County Emergency Operations Plan prior to the next exercise (August 1984).
3. E.1., E.2., F.1.a., F.1.e., H.4.: In its initial critique, FEMA listed these elements as "Significant Deficiencies," as "exercise objectives," as "specified in the exercise objectives," etc. As has been repeatedly stated to FEMA, these were not exercise objectives nor were they implied objectives. Therefore, in terms of the exercise and scenario approved by FEMA, these are not deficiencies. No corrective actions are necessary.

In this latest letter, FEMA states that "each criteria was cited to focus attention on our recommendation that this capability should be demonstrated during the next exercise." If FEMA would like to see these elements demonstrated, FEMA should make this recommendation during the 90 day meeting prior to the next Palisades exercise. In addition, many of these items are being addressed in the D.C. Cook exercise on January 25, 1984.

Based on the original FEMA critique, the state does not feel that there was a deficiency because these elements were not exercise objectives.

4. M.1.: If FEMA would like to see this element demonstrated during the August 1984 exercise, the state would agree. However, this would preclude notification and activation of EOCs because of time constraints.

C. Berrien County

No deficiencies listed.

D. Van Buren County

1. E.7.: Transmission of data to JPIC and EBS would be via phone from the Van Buren County EOC. Calls to EBS are simulated as is the prompt alert notification system (sirens) so as to avoid any possible confusion. EBS is used for non-radiological emergencies frequently enough to allow familiarization for users and to detect problems and have them corrected. In addition, the siren control board was demonstrated to the evaluators up to the point of actually sounding the sirens.

2. J.10.c.: The state's response is, again, to see above comment.
3. J.10.d.: No additional response necessary.
4. E.1., E.2., E.1.a., F.1.e., H.4.: No additional response is necessary for these elements. See Allegan County comments.

II. MINOR DEFICIENCIES

A. State

1. G.4.a.: The state has additional personnel at the JPIC in support of the state spokesman as demonstrated at the Big Rock Point full-scale exercise.
2. H.3.: The status board will be placed in a more visible position as of the January 25, 1984 Cook Exercise.
3. J.10.a.: Radiological Health is currently updating their field sampling monitoring points. These will be provided to the Emergency Management Division as they are completed.

B. Allegan County

1. D.4.: Correction, the latest update of the Allegan County EOP has been provided to FEMA as of 10-17-83. This was for the purpose of maintaining controlled distribution of current plans.
2. K.3.b.: Correction date - during annual training program - July/August, 1984.
3. A.4.: Correction date - next exercise - August 1984.
4. F.1.d.: No correction needed.
5. G.3.a.: No correction needed.

C. Berrien County

No response required.

D. Van Buren County

1. A.1.a.: No additional response necessary.
2. J.10.b.: As soon as data is available from NRC, FEMA, or the utility, the maps will be updated to show the population distribution in the 5-10 zones.

3. J.10.f.: This issue will be resolved by the next exercise in August 1984.
4. K.3.b.: As stated in the state response, the dosimeters will be removed from the County EOC since they are inappropriate and were placed there originally based on FEMA's recommendation. The plans and procedures will be revised if necessary by the next exercise (August 1984) to reflect this change.
5. J.10.j.: The state does not believe it is necessary to move vehicles during an exercise. If, however, FEMA will not accept state policy, an attempt will be made to resolve this issue during the August 1984 exercise if the problems of time, cost, and liability can be resolved with the involved counties.
6. A.4.: Correction date August 1984 exercise.
7. F.1.b.: No response necessary.
8. K.3.a.: No response necessary.

III. COMMENTS ON FEMA'S CRITIQUE

FEMA did not address the state's comments on its critique. The statement "the critique system has changed as a result of the new 44 CFR 350," does not address all of the issues raised in the comments. There still seems to be confusion on the issue of whether alert, notification, and mobilization was an objective or not for the Palisades exercise. FEMA did not address this. The new exercise critique module still contains subjective evaluations though it is an improvement. Issues raised in IIIB of the state response were not answered by FEMA.



JAMES J. BLANCHARD, GOVERNOR
DEPARTMENT OF STATE POLICE

COL. GERALD L. HOUGH, DIRECTOR

February 6, 1984

EMERGENCY MANAGEMENT
LOWER LEVEL
111 S. CAPITOL AVENUE
LANSING, MICHIGAN 48201
PHONE: 313 371-8817

Mr. Wallace Weaver, Chairman
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Federal Emergency Management Agency
Region V - Chicago
300 S. Wacker Drive, 24th Floor
Chicago, Illinois 60606

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If you have any questions, please feel free to contact this office.

Sincerely,

PETER R. BASOLO, CAPTAIN
Deputy State Director of
Emergency Services

PRB:DMS:cmh

Attachment

cc: 1 Dan Bement, F.E.M.A. - Battle Creek

1/14

FO 111 7

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2/14

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4. M.1.: If FEMA would like to see this element demonstrated during the August 1984 exercise, the state would agree. However, this would preclude notification and activation of EOCs because of time constraints.

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No deficiencies listed.

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2. J.10.c.: The state's response is, again, to see above comment.
3. J.10.d.: No additional response necessary.
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4/14

3. J.10.f.: This issue will be resolved by the next exercise in August 1984.
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III. COMMENTS ON FEMA'S CRITIQUE

FEMA did not address the state's comments on its critique. The statement "the critique system has changed as a result of the new 44 CFR 350," does not address all of the issues raised in the comments. There still seems to be confusion on the issue of whether alert, notification, and mobilization was an objective or not for the Palisades exercise. FEMA did not address this. The new exercise critique module still contains subjective evaluations though it is an improvement. Issues raised in IIIB of the state response were not answered by FEMA.

5/14



Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

SEP 14 1983

MEMORANDUM FOR: Assistant Associate Director, Office of Natural
and Technological Hazards

Attention: Megs Hepler

FROM: Chairman, Regional Assistance Committee

SUBJECT: Palisades Exercise Final Report

Attached is the Final Report for the Palisades Exercise, conducted May 25, 1983. This report indicates the State of Michigan and the Counties of Allegan, Berrien, and Van Buren have demonstrated a capability to protect the health and safety of the citizens and the property in the area at risk.

In view of the fact that this report had been developed prior to receiving the new guidance, and in order not to expend more staff time redoing the report in the new format, we are submitting this under the old procedures.

A schedule of corrections of deficiencies noted in Part IV has been requested from the State of Michigan by October 28, 1983.

for Dan Bement
Frank Finch

Attachment