

here is the missing pg.

-----:
:
MEETING OF FEMA, REGION II :
REGIONAL ASSISTANCE COMMITTEE (RAC):
with :
LONG ISLAND LIGHTING COMPANY (LILCO):
:
-----:

ORIGINAL

May 11, 1984

Before: Raymond De Simone, a Certified Shorthand
Reporter and Notary Public, at the offices of
Federal Emergency Management Agency, 26 Federal
Plaza, New York, N.Y., at 10 a.m.

TAYLOE ASSOCIATES
1625 Eye Street, N.W.
Washington, D.C. 20006

8406060334 840516
PDR ADOCK 05000322
F PDR

A P P E A R A N C E S:

ROGER B. KOWIESKI, Chairman

FEMA

(Attendees on attached sign-in sheet.)

1 MS. CAMPAGNONE: I guess I will start
2 the meeting by introducing myself. My name is
3 Maryjo Campagnone. I am a licensing project
4 manager with the Division of Licensing at the
5 Nuclear Regulatory Commission. I am an assistant
6 to the project manager, Ralph Caruso.

7 Joined with me today from the NRC is
8 Mr. Bernard Bordenick. He is our legal counsel,
9 and maybe not at this time but he will be here
10 shortly, Dr. Bellamy from the Region I office.

11 I will say that I am well aware that
12 the press is present and I have a request that
13 they not use lights during the meeting, although
14 they may film, as they get to be pretty hot and
15 uncomfortable.

16 This meeting is held pursuant the
17 meeting notice that went out from the NRC office
18 on May 2, 1984, and I will read you the purpose of
19 this meeting.

20 For the representatives of the Long
21 Island Lighting Company, LILCO, to brief the
22 representatives of the Federal Emergency
23 Management Agency, known as FEMA, Region II,
24 Regional Assistance Committee, the RAC Committee,
25 on the LILCO proposal to remedy deficiencies

1 identified by the RAC in the LILCO off-site
2 emergency plans for the Shoreham Nuclear Power
3 Station.

4 FEMA is coordinating the review for
5 the LILCO off-site plans and is conducting this
6 meeting in response to a request from the Nuclear
7 Regulatory Commission in accordance with Section 2
8 (4) 1980 FEMA Memorandum of Understanding.

9 The next order of business is we are
10 going to discuss the ground rules of the meeting.

11 The meeting is being held by NRC and
12 FEMA. The participants will be FEMA, the Nuclear
13 Regulatory Commission and LILCO only. The meeting
14 is open to the public for observation, and
15 observation only, not for public participation.

16 The public will be allowed to comment
17 at the close of the meeting and to only comment.

18 Any questions at the close of the
19 meeting can be sent to the NRC, but our purpose
20 and function here today is not to respond to
21 questions from the public. This meeting will be
22 transcribed, everything that we say here is on the
23 record.

24 At this time I will turn the meeting
25 over to FEMA.

1 MR. KOWIESKI: Thank you. My name is
2 Roger Kowieski. I am the chairman of the Regional
3 Assistance Committee. First let me introduce
4 members of the RAC Committee. Our consultants,
5 consultants to FEMA, and FEMA staff from FEMA
6 regional office as well as national office.

7 On my left is Dr. Robert Bores of NRC,
8 RAC member; Herbert Fish from DOE; Joyce Feldman
9 from EPA; Ronald Bernacki from FDH and RAC
10 administration; Cheryl Malina from US Department
11 of Agriculture; Paul Lutz from the Department of
12 Transportation, Coast Guard; member of my staff,
13 Robert Acerno; my boss, chief, National
14 Technological Hazards Division, FEMA Division II,
15 Philip McIntire; consultant to FEMA, Joseph
16 Keller from the Idaho Nuclear Engineering
17 Laboratory; Dr. Thomas Baldwin from Argon National
18 Laboratory.

19 STu Glass, regional counsel; Mary
20 Jackson, our public information officer.

21 We have Spence Perry, associate
22 general counsel from FEMA headquarters office. We
23 have a Maria Vorel from the Congressional Liaison
24 Office; and Dave Deone, Public Affairs Office.

25 Did I miss anyone?

1 I am sorry, Rose Walsh, who is
2 helping us today from our FEMA Region II office.

3 Maryanne Jackson is here, Public
4 Information Officer.

5 Before we start our discussion, get
6 to our discussion, I suggest that the LILCO
7 representatives introduce themselves, and also we
8 would like to know who is in the audience. We
9 would also like the audience to introduce
10 themselves so we know who will be listening to us.

11
12 MR. IRWIN: Let me introduce the LILCO
13 representatives. My name is Donald Irwin. I am
14 one of counsel for Long Island Lighting Company.
15 Since this is a technical meeting and I am a
16 lawyer, this will be about of the last thing I say
17 all day today.

18 On my right is Chuck Daverio, who is
19 with Long Island Lighting Company and is the
20 deputy director of LERO or LERIO; John Weisman,
21 who is the director of LERIO is on the witness
22 stand this morning. Otherwise he would be here.

23 With me on my left is Brant Aidikoff,
24 who is also with LERIO. He is with Stone &
25 Webster. Brant has been working on the emergency

1 plan continuously from day one. He and Chuck have
2 been primarily responsible for developing comments
3 on the RAC review and responses to them.

4 I believe although they are new in
5 numbers, they are long on knowledge.

6 MR. KOWIESKI: Let's start with you,
7 sir. Will you introduce yours?

8 MR. CHANNAHAN: Jefff Channahan with
9 the Associated Press.

10 MS. HANSKI: Karen Hanski, with
11 Channel 11.

12 MR. PRINCETON: Harvey Princeton with
13 the Public Service Commission.

14 MR. BIALIK: Ezra Bialik with the New
15 York State Attorney General's Office.

16
17 MR. LAWFORD: Larry Lawford with the
18 Kirpatrick firm representing Suffolk county. John
19 Birkenheier is from my firm also.

20 I delivered a letter this morning to
21 Mr. Glass this morning, which states that Suffolk
22 County formally objects to this meeting. We want
23 to make it clear we have requested meetings with
24 the RAC over and over since early this year and
25 FEMA, for whatever reason, has declined to allow

1 us to have that kind of meeting between our
2 experts and the RAC experts.

3 We formally reiterate that request.
4 We think it is very surprising, after all our
5 requests have been turned down, that LILCO is
6 granted this meeting.

7 One other thing I would like to just
8 say. While I understand that comments from the
9 public shouldn't be entertained, Suffolk County is
10 not just the public. We have been an active
11 participant and we think that we should be allowed
12 to make comments also on this meeting.

13 MR. KOWIESKI: Sir?

14 MR. BRAND: Rick Brand, Newsday.

15 MR. KOWIESKI: You gentlemen with the
16 camera?

17 A VOICE: Channel 11 news.

18 MR. KOWIESKI: Before we start our
19 discussion, RAC comments on the LILCO Transition
20 Plan, Divison III, let me give you a brief
21 background on the RAC review of the LILCO
22 Transition Plan for Shoreham.

23 On December 30, 1983, LILCO provided
24 RAC members and FEMA with a complete set of plans,
25 revision three. By January 16, 1984, RAC comments

1 on the LILCO Transition Plan for Shoreham were
2 received by our FEMA regional office. FEMA
3 initiated consolidation of RAC comments.

4 On January 20, 1984, the Regional
5 Assistance Committee and our consultants met in
6 New York City to deliberate and consolidate
7 planning and review comments.

8 The RAC reached consensus on its plan
9 review document. Between January 20 and February
10 10, 1984, the document was carefully reviewed for
11 consistency and finalized.

12 On February 21, 1984, Frank Patrone,
13 FEMA Region II director, transmitted the RAC
14 comments to FEMA headquarters office.

15 In early March FEMA headquarters
16 office transmitted the RAC comments to the Nuclear
17 Regulatory Commission. And then NRC furnished
18 LILCO with a copy of the RAC comments.

19 As was already stated, LILCO
20 reviewed the RAC document and requested this
21 meeting.

22 What I suggest today is that we go
23 over the RAC comments element by element. Any
24 discussion will be limited to NUREG 0654. I still
25 maintain that we review only the LILCO plan and we

1 will entertain comments only from LILCO. Any
2 other parties willing to meet with this committee,
3 or FEMA, I would suggest again the discussion will
4 be held my counsel, FEMA counsel, and counsel for
5 the party who would like to participate.

6 If you people from LILCO, if you do
7 not have any comments or questions on any
8 particular element rated adequate or inadequate
9 with need for additional work, you state so,
10 saying that we would like to receive a
11 clarification of what needs to be done.

12 As I stated, we will not review any
13 material. Any new material has to be submitted to
14 NRC and only NRC through FEMA NRC Steering
15 Committee may request the a formal RAC review.

16 Let me proceed then to NUREG 0654,
17 planning criteria. Whenever you are ready, please
18 let me know.

19 MR. IRWIN: I think we are ready. I
20 have two preliminary observations. First of all,
21 we are grateful for this opportunity to meet with
22 the RAC. We understand that there are going to be
23 no approvals of any kind, conditional, final or
24 whatever. What we are interested in is a
25 technical interchange on the items indicated in

1 the RAC review and LILCO's provisional responses
2 to them.

3 We have prepared a matrix which goes
4 down the RAC review item-by-item and which
5 indicates by summary the nature of LILCO's
6 provisional response. We believe that this would
7 be a useful working document to help us go down
8 the meeting. You should not consider it a formal
9 submittal. We would be happy to take it back
10 after the meeting or do whatever you want. It is
11 simply a working document that we have assembled
12 to grade our work.

13 LILCO has done a considerable amount
14 of work since receiving the RAC review and we hope
15 this meeting will help expedite the correction of
16 those deficiencies that are necessary before a
17 fully graded exercise can be conducted, as was
18 foreshadowed in Mr. Speck's letter of April 26.

19 So, Dr. Kowieski, if it would be
20 useful for us to pass it out to any members of the
21 audience, or whoever else wants to receive a copy
22 of this matrix, we will be happy to do it. We
23 think it will help organize the meeting. If you
24 would rather not, we can proceed also.

25 It is your call. We are prepared to

1 start from the beginning.

2 MR. KOWIESKI: Let's recess for a
3 moment.

4 (There was a short recess.)

5 MR. KOWIESKI: We can resume the
6 discussion. I request the RAC members, as well as
7 our consultants, FEMA staff, not to mark up a copy
8 of this document, which will be returned to LILCO
9 representatives at the end of our discussion.

10 MR. DAVERIO: If I might, if I could
11 explain what it is that's on here, it may help and
12 everyone will understand what we have done.

13 We actually have two tables here.
14 The first twelve pages of which address items
15 rated inadequate in the RAC comments. And at the
16 end of those twelve pages there are another three
17 pages which discuss items graded adequate but that
18 necessary revisions had to be made to make it
19 adequate. So we have broken it out into the two
20 items.

21 If you let me go across the columns I
22 will explain what we did to make this table up.

23 A 1-A, as we all know, is the NUREG
24 0654 reference, and I assume that's the order you
25 intended to go down.

1 MR. KOWIESKI: That's correct.

2 MR. DAVERIO: The parenthetical
3 expression 1 through 4 were the four items that
4 LILCO, in its review of the RAC comments, felt
5 were required to be modified to make A 1A adequate,
6 from the inadequate stage.

7 It is also, just so no one feels that
8 we tried to copy the RAC comment, that it is our
9 interpretation of what we think RAC was looking
10 for. It may not exactly fit what RAC was looking
11 for, and that is part of what we would like to, of
12 course, determine today.

13 The next column which says "Resolution"
14 is a brief description of the anticipated actions,
15 or actions already taken in draft form, by LILCO to
16 the LERO plan to respond to the RAC comment that
17 is to the left of it.

18 The fourth column called "Pages or
19 "Plan/procedures effected," it is just that. It
20 is what we intend to revise in the manner
21 discussed in the resolution. I think that may
22 help everyone understand what this table tries to
23 do.

24 If Anyone has any questions on that,
25 I will be glad to answer them.

1 MR. KOWIESKI: If I understand, you
2 did not necessarily use our comment directly. You
3 tried to paraphrase, or in an abbreviated form you
4 presented this in the column "RAC comment."

5 MR. IRWIN: That's correct. In most
6 cases it is a verbatim excerpt. What we have done
7 item-by-item in the RAC comments is to -- take
8 item A 1A as an example, what you will see is that
9 the first two paragraphs don't appear at all in
10 this matrix that we have prepared because we
11 understood that to be foundation from the RAC
12 comments.

13 The first observation or an observed
14 deficiency appears at the beginning of the third
15 paragraph. That has become item one on our item A
16 1A. So what we have done is we have looked at
17 your comments, tried to analyze what we thought
18 you had in mind when you said there was a
19 deficiency, and proceeded from there.

20 MR. KOWIESKI: Your interpretation is
21 correct.

22 MR. IRWIN: Why don't we just start at
23 the beginning.

24 MR. DAVERIO: Mr. Kowieski, I don't
25 know what you intended to do now. Did you want us

1 to start at one or did you want us to start
2 somewhere? We have some basic concepts of what we
3 thought the RAC comments had. If you have a
4 different way that you want to proceed, we will
5 proceed however you would like.

6 MR. KOWIESKI: Have I suggest that you
7 explain to us as to what you intend to accomplish.

8 MR. DAVERIO: In general terms?

9 MR. KOWIESKI: In general terms, and
10 somenow again paraphrase what you are saying here
11 so we will understand.

12 MR. DAVERIO: Just as a summary
13 purpose we had, besides going through this, felt
14 that the RAC comments really fell into six broader
15 categories than each of these items. And what we
16 categorized as interrelationship of actual or
17 potential groups participating in the plan was one
18 category we lumped a bunch of RAC comments in.

19 Examples would be the actual Federal
20 response comments you had or the potential
21 participation by Suffolk County or New York State
22 comments, which you did have.

23 We generally saw three protective
24 action decision-making general comments, one of
25 which had to do with radiological assessment and

1 monitoring; one had to do with plant protective
2 actions based on plant conditions rather than
3 radiological conditions; and the third one had to
4 do with the ingestion pathway protective actions.

5 The third broad category of comment
6 we saw was letters of agreement and all the things
7 that could fall out of that. That appears many
8 places in the RAC review.

9 The fourth one basically fell into
10 what we called the decontamination in hospitals.

11 The fifth basically had to do with
12 potassium iodide and its potential use during an
13 emergency.

14 The sixth general category we saw was
15 relocation.

16 At this point we are willing to go
17 down the items in the 0654 reference one-by-one
18 with you in the two categories I have just
19 discussed.

20 For the record, I would like to note
21 there was a third category of adequate with
22 suggestions. We have not had the time to go into
23 those. If you intended to discuss those, we are
24 not prepared to discuss those today.

25 We are willing to do it either way,

1 go one-by-one, or we have already in our own mind
2 broken the 16 categories -- 16 planning criteria
3 and all the subparts into what we consider two
4 categories, items which we would like further
5 clarification on, or items we believe important
6 and should be pointed out to RAC for their
7 potential comment or clarification.

3 We can do it that way or we can go
9 down it one-by-one. We have already prioritized
10 which order we would like to talk in but we can go
11 one-by-one.

12 (There was a pause in the proceeding.)

13 MR. KOWIESKI: I suggest that we take
14 the second option and just discuss the items on
15 which you need our clarification.

16 MR. DAVERIO: The way we have broken
17 it down, it will work out somewhat similar though
18 we won't go through every paragraph of 0654. We
19 will talk planning criteria A, and move to B. We
20 will talk specifically on certain sentences in 0654
21 and we may talk in general about something because
22 it falls in three or four different places within
23 0654.

24 So, under planning criteria A, which
25 is Assignment of Responsibility, the first place

1 that we need some clarification from the RAC,
2 though based on our interpretation we have down on
3 our table what we think would respond. RAC, in
4 its comments, said we should address federal
5 agencies in terms of their response to the
6 emergencies. We have characterized that A1-A3.

7 What we intend to do for that -- it
8 is on the top of page 2 of 60 of the RAC review.
9 What we intended to do to address that item is to
10 basically put into the LERO plan a summarization of
11 the federal radiological response plan as
12 contained in the Federal Register Notices, that
13 used to be called the Master Plan.

14 What we need to know from RAC, were
15 those the types of things that you were looking at
16 or are you looking for a different type of
17 response in that area?

18 MR. KOWIESKI: That's the type of
19 response we are looking for. And whatever you are
20 proposing appears reasonable. But again we would
21 have to review the document.

22 MR. DAVERIO: We understand the exact
23 language has to be reviewed. We are looking for
24 the planning concepts so we know whether to go
25 back and start at ground zero or are we heading on

1 the right track.

2 MR. BORES: I think what we were
3 looking for also there is if any individual
4 agencies specifically were going to be called in
5 to support, that those resources be identified. I
6 think you have a couple of agencies that you do
7 specifically identify.

8 So if there were any other ones,
9 identify those.

10 I think as far as the FRERP was
11 concerned, I don't think you need to go in and do
12 that because that is available.

13 MR. DAVERIO: It is my understanding
14 the plan as it now exists has a description of the
15 federal agencies we would consider as needing
16 assistance from. I read the RAC comment to go
17 further and say: Well, what if you needed
18 assistance, what would they be able to do and how
19 would you contact them?

20 What we plan to do is put a step in
21 that "if you need to notify," and I won't say this
22 is the example, but Aggers & Marx, there is a
23 phone number and a slight description from the
24 master plan of what they could do for you. That's
25 the type of thing we are looking at right now.

1 The second major area, though this
2 one is one that falls sort of not to one specific
3 RAC comment, though it is mentioned in many RAC
4 comments as letters of agreement -- it is A3, but
5 it is also mentioned many times for many different
6 things.

7 MR. KOWIESKI: For Element C and
8 others.

9 MR. DAVERIO: I am only going to try
10 to address it once and then we won't talk about
11 letters of agreement again.

12 And the clarification we have to the
13 get from RAC is we have or we will propose a
14 concept of three different types of support
15 organizations, as we see it, that could be
16 construed as supporting the LERO plan. The first
17 of which would be what we call contracts. And
18 what we will define contracts in the next revision
19 to the plan, as it stands right now would be
20 private companies providing services on short
21 notice.

22 Examples of that would be bus
23 companies that we do have contracts with and
24 ambulance companies that we have contracts with,
25 helicopter services which we have contracts with.

1 The second category would be the letters
2 or agreement/memoranda or understanding. This
3 would be with nonprofit public organizations or
4 other utilities. It wouldn't be a contract. It
5 would be some type of letter of agreement or
6 memorandum of understanding.

7 The third type of support
8 organization would be the federal mandated
9 organization, and that we just previously
10 discussed.

11 I guess the problem we are having
12 with letters of agreement or understanding is
13 best -- and I will use an example to see if RAC
14 can give us some guidance on this. The American
15 Red Cross being the example that I will use,
16 though we could probably talk about others.

17 From my discussions with the American
18 Red Cross and other people's discussions with the
19 American Red Cross of Suffolk County, their
20 chapter, they feel that they are mandated to
21 provide relocation center services if a disaster
22 occurs. And because of that position did not feel
23 it necessary to provide LERO or LILCO with a
24 letter of agreement stating that they would do
25 that.

1 It is their position since they are
2 mandated to do it, they would do it, and they
3 don't intend to, because they don't feel it is
4 necessary to, provide us the letter.

5 The second level of that is they have
6 letters of agreement with relocation centers,
7 between the Red Cross and a specific place. They
8 feel that that is a private agreement between them
9 and that person and they don't feel that obligated
10 to provide that that to us either, though they
11 said they will activate the Red Cross -- activate
12 the relocation centers as the Red Cross would do
13 anywhere, because they are mandated to do it in
14 their opinion, and would accept a letter from us
15 stating that, which we did send.

16 I believe it was in the plan. And it
17 came back to us as, I believe, an open item, still.

18 I don't know how we can pursue
19 closure on that given the Red Cross' independence
20 from anyone in this room. We are really looking
21 for RAC guidance on how you approach or what your
22 interpretation is to approach those type of
23 problems.

24 MR. KOWIESKI: What I suggest is you
25 submit copies of letters of agreement between

1 various reception centers and the Red Cross for
2 our review.

3 MR. DAVERIO: The Red Cross has told
4 us that's a private agreement between them and
5 that reception center, and we are not privy to get
6 a copy of it. But they have given us assurances
7 that they have them and they would activate them.

8 MR. KOWIESKI: So, again, if you can
9 provide us with a copy of that letter saying that
10 letters of agreement exist between various
11 facilities to be used as a reception center and
12 that, however, this is a private matter and we
13 will not release it to the public.

14 MR. DAVERIO: That goes to the second
15 problem that they brought up and that they don't
16 feel it is necessary for them to write me a letter
17 telling me that, because they are mandated to set
18 up reception centers if there is an emergency, or
19 any disaster. We get in the problem of the Red
20 Cross-- it states it is the only volunteer
21 legislatively chartered agency and its mandate is
22 to help in a disaster and help set up relocation
23 centers.

24 MR. KOWIESKI: We do understand your
25 concern. However, this Regional Assistance

1 Committee did not create the requirement. It is a
2 requirement of NUREG 0654, which is what we are
3 going by.

4 MR. DAVERIO: I guess you don't find
5 the letter from us to them confirming it. I will
6 explain what we have. We have a letter from us to
7 them explaining what our understanding of what
8 they would provide is; no response back to us
9 against that.

10 MR. KOWIESKI: We understand.

11 MR. DAVERIO: The second thing is they
12 sent us a copy of what their national policy --
13 unsigned, just sent us a copy of the national
14 policy and said that's what we will respond
15 according to.

16 MR. IRWIN: As I understand it, that
17 national policy clearly covers the kinds of
18 actions which we would expect the Red Cross to
19 undertake.

20 The long and short of it is the Red
21 Cross has told Chuck any number of times that they
22 will do their duty and their duty consists of such
23 things as opening relocation centers. They told
24 us they have agreements with these relocation
25 centers. They don't feel that they can be

1 compelled to turn over those agreements and they
2 don't want to provide us with anything special in
3 writing beyond what their basic policy is.

4 They have told us any number of times
5 they will execute that policy. And we believe
6 them.

7 MR. KOWIESKI: The letter of agreement
8 with the Red Cross is only one issue. The second
9 issue is the letters of agreement between various
10 facilities to be used as reception centers in
11 LILCO.

12 MR. DAVERIO: According to the LERO
13 plan, LILCO doesn't activate any reception centers;
14 the Red Cross activates them. That's our
15 understanding of how our plan would be carried out.

16 MR. KOWIESKI: However, your plan
17 states that certain facilities will be used as
18 relocation centers or reception centers. And
19 according to NUREG 0654 we need the letters of
20 agreement.

21 MR. DAVERIO: The problem is that
22 those are listed in the plan based on
23 representations by the Red Cross to us as to what
24 they would activate.

25 MR. KOWIESKI: You understand our

1 position. I don't think we are going to resolve
2 it right now.

3 MR. IRWIN: Let me make sure I
4 understand your position. You are not saying that
5 even though we don't have a direct agreement with
6 the relocation centers, we have to get a letter of
7 agreement with them? We don't have a direct legal
8 relationship with those centers; we have a
9 relationship with the Red Cross which, in turn,
10 has a relationship with the relocation centers,
11 and there is no way it would make sense for us to
12 get them.

13 MR. KOWIESKI: The Red Cross will
14 establish relocation centers. In addition LILCO
15 or LERO will have monitoring teams checking for
16 possible contamination.

17 MR. KELLER: It is not strictly a Red
18 Cross center.

19 MR. IRWIN: What you are interested in
20 is agreements with respect to the monitoring?

21 MR. KELLER: The use of the facility
22 and making sure everything is okay.

23 MR. DAVERIO: We will go back and
24 discuss this further with the Red Cross.

25 MR. AIDIKOFF: Let me ask a question

1 to clarify. Are you saying relative to the extent
2 to which LERO would use this relocation center,
3 i.e., for monitoring, possibly decon, possibly
4 storage of that type of equipment, a letter of
5 agreement to support that effort as opposed to a
6 letter of agreement to support it as a relocation
7 center, which is in fact done by the Red Cross, is
8 appropriate?

9 I am trying to narrow the issue.

10 MR. KOWIESKI: Our point, and again
11 let me reiterate, our point is very clear. We
12 want assurance that a facility identifying the
13 plan will be available as a relocation center
14 during an emergency. That's our concern. That's
15 what we ask for. If we ask for letters of
16 agreement with the Red Cross, you said no, they
17 are not willing to release that. We are asking
18 you to let the Red Cross write to us and they are
19 not willing to do that.

20 MR. DAVERIO: We may be willing to do
21 it. Maybe they will write to you, and I have not
22 broached that question with them. I will go back
23 and bring that up. We can pursue that with them,
24 if that is acceptable or one alternative.

25 MR. KOWIESKI: It is one alternative

1 that we would consider.

2 MR. DAVERIO: I guess one other one,
3 though, under letters of agreement there are a few
4 that we would like to get some clarification on.
5 Laboratories which provide environmental sample
6 analysis, that falls under -- it has the listing
7 under A1.

8 MR. KOWIESKI: If you can identify the
9 page number.

10 MR. DAVERIO: It is page 10.

11 MR. AIDIKOFF: We are looking at two
12 different documents.

13 MR. DAVERIO: It is page 10 of the RAC
14 review.

15 MR. IRWIN: Item 6 of A 1A.

16 MR. AIDIKOFF: Page 4 of 12 item A 36
17 on the matrix.

18 MR. DAVERIO: We don't think that's
19 necessary or, at most, a reference to our
20 contracts with laboratories is part of our on-site
21 emergency plan or the normal LILCO contracts. If
22 those are the types of things you are looking for,
23 we can do something in that area.

24 MR. KELLER: I think in the plan you
25 say that these facilities, these companies are

1 available. There is nothing in the plan which
2 supports the fact that they are available.

3 MR. IRWIN: In other words, the
4 contract that we have with them would be evidence
5 of that?

6 MR. KELLER: That would be fine.

7 MR. DAVERIO: We can accommodate that.

8 One other one that I know has been
9 broached before, because I was at a meeting where
10 it was discussed, not specific to Shoreham but in
11 general, the letter of agreement. At least -- I
12 haven't talked to the regional office at
13 Brookhaven recently on this, but it had been their
14 position to us that they would only give us the
15 standard letter that everyone got in the country,
16 and it appears to us that one RAC comment -- at
17 least one of the RAC comments in A 3 and on our
18 table it appears as our parenthetical number 5 --

19 MR. IRWIN: In the RAC report itself
20 it is in the last paragraph of page 9.

21 MR. DAVERIO: The people from DOE have
22 told us that's the same letter they give to
23 everyone in this region, and at the time we
24 discussed that letter of agreement with them they
25 felt that was all that was required to justify

1 their response. I don't know that we can get
2 anything further from DOE, and I am just looking
3 for RAC guidance in that area.

4 MR. KELLER: I think, and I may not be
5 correct, that Mr. Schweller of DOE, Brookhaven,
6 has filed an affidavit with the SLB board, and I
7 think that may resolve the issue.

8 MR. DAVERIO: It may but it is not
9 considered a letter of agreement.

10 MR. KELLER: This discussion on the
11 bottom of page 9 of the RAC review is a
12 clarification, and I think that affidavit may
13 indeed -- I haven't seen it yet, but it may.

14 MR. KOWIESKI: We have to see it yet.

15 MR. DAVERIO: I guess one that we also
16 need some clarification on appears on page 10 of
17 the RAC comment, the last paragraph, and it
18 relates to our attachment 311-1. 311-1 was put
19 into the LERO plan really just to list the
20 laundromats, the hotels, the restaurants; anything
21 on Long Island, where someone who was on Long
22 Island who didn't know Long Island might want to
23 know where to find. Figuring you may need to know,
24 if there was an emergency, if you wanted to wash
25 clothes, you would want to know where the

1 laundromat is.

2 It appears you are looking for a
3 letter of agreement with all those people and I
4 don't understand that.

5 MR. KELLER: I think it interrelates
6 with the comment on the RAC comment C-1C, or page
7 12 of the RAC comments, the bottom of 12.

8 MR. DAVERIO: We were going to ask for
9 clarification on that when we got to it.

10 MR. KELLER: This is what it is all
11 about. If some of the federal agencies respond,
12 and in the case of EPA, which is the example we
13 showed here, had may have some special
14 requirements, and their requirements are available
15 to everyone. They will let you know what they
16 need ahead of time. If you are going to ask them
17 to respond and to help, they need some help from
18 you.

19 MR. IRWIN: So, in other words, this
20 goes back to your observation a few minutes ago on
21 the delineation of response by federal agencies
22 generally.

23 MR. KELLER: Yes.

24 MR. IRWIN: As to federal agencies we
25 are specifically intending to rely on, you are

1 interested in making sure that we know in advance
2 what preparations they need us to take.

3 MR. KELLER: That's right, and if you
4 have taken these preparations and can support them.

5 MR. IRWIN: A-17 and C-1C are all
6 based on the original comment.

7 MR. KELLER: All intermeshed.

8 MR. DAVERIO: So basically you are
9 looking for us -- we might as well do C-1C while
10 we have it now, because what we have here won't
11 respond, in our matrix, won't respond to that
12 comment we just got from RAC's consultant.

13 You are basically looking for us for
14 the federal agencies we consider a response
15 required, DOE being one, NAA, EPA --

16 MR. KELLER: The point is that under
17 FRERP, after the emergency phase is over, the lead
18 role passes from DOE to EPA. Therefore, EPA is
19 involved even though you don't have them
20 specifically as a separate agency.

21 MR. DAVERIO: The concern we had, and
22 we can address the EPA ones, is there a master
23 list that is used for the federal master plan or
24 the new acronym they have for it, that tells us
25 everything we should be looking for to assist any

1 federal response.

2 MR. KOWIESKI: I suggest you write a
3 letter to each federal agency requesting what they
4 need in case there would be need for their
5 response.

6 MR. IRWIN: Would you suggest this go
7 to each of the agencies indicating in the FRERP or
8 simply to the ones that we think are ones we would
9 actually like to rely on? There are a lot of
10 agencies in there, they are available, but we
11 haven't necessarily factored them specifically
12 into our needs, such as the Department of Defense
13 for instance.

14 MR. KOWIESKI: We suggest that you
15 send a letter to each federal agency identified in
16 the Federal Emergency Response Plan, and ask what
17 do I need.

18 MR. KELLER: That they intend to use.

19 MR. DAVERIO: I think that covers the
20 broad topic of letters of agreement. One other
21 comment I guess that RAC had that we have a little
22 bit of a problem understanding exactly what they
23 want, it is on our page three, parenthetical
24 number four, which is on RAC page 9, third
25 paragraph, last sentence. The plan does specify

1 the number of bus drivers in the organization
2 chart contained in Chapter 2, specifically figure
3 2.1.2--wrong one. 2.1.1.

4 That figure has, in a little box in
5 the right-hand column, the number of bus drivers
6 for a one-shift coverage. If you look in the
7 right-hand column, it is added up. It has
8 confused people, including us, for a period of
9 time.

10 Let me get to the right page so I can
11 do it. What this chart shows is there are 108 bus
12 drivers that we would have at the Port Jeff
13 staging area to be sent out to drive buses, 100 at
14 Riverhead and 125 at Patchogue.

15 As stated on page 3 of our table, it
16 is our intent to have 150 percent of that,
17 approximately, trained and licensed with New York
18 State licenses.

19 If that's what would you would like
20 somewhere in the plan, we can put it in.

21 MR. AIDIKOFF: It varies.

22 MR. DAVERIO: It varies but that's the
23 goal, 150 percent.

24 MR. KELLER: Some statement that you
25 have -- you have 333 bus drivers here.

1 MR. DAVERIO: Right now we have 450
2 licensed New York State ones.

3 MR. KELLER: That you have that many
4 trained licensed drivers.

5 MR. DAVERIO: We can put that in the
6 plan someplace.

7 MR. BALDWIN: It would be helpful to
8 put in 150 percent of the buses you expect to have.

9 MR. DAVERIO: Just an overall goal,
10 anything that was a one-shift emergency function,
11 bus drivers, traffic guides, they were staffed to
12 approximately the 150 percent level. Shift work
13 was three shifts.

14 MR. KELLER: That would be helpful in
15 a discussion somewhere.

16 MR. DAVERIO: We can put it in the
17 plan and discuss that concept. That was a
18 planning goal.

19 That concludes any clarification we
20 felt, though, again, different issues jump at
21 different times. We may discuss something when we
22 get to H that also falls in A, but we saw it more
23 important when we got to H.

24 As far as we are concerned, we have
25 covered what we want in A. If you have any

1 questions on anything, we would be willing to, of
2 course, answer them.

3 MR. KOWIESKI: We don't have a
4 question.

5 MR. DAVERIO: I mean what we have
6 discussed, are there any questions before I move
7 on?

8 MR. KOWIESKI: Does RAC have any
9 comments on whatever was said?

10 MR. KELLER: I want to state on the
11 record that even though this matrix has a number
12 of resolutions shown that we have not discussed,
13 we have not evaluated those.

14 MR. IRWIN: That's absolutely correct.
15 This is a preliminary internal working document
16 that LILCO is using, which we simply passed along
17 today to help organize the discussion.

18 MR. DAVERIO: Planning criteria B is,
19 or course, focused on-site and it is our
20 understanding that RAC doesn't review for
21 compliance.

22 MR. KOWIESKI: That's correct.

23 MR. DAVERIO: Moving to planning
24 criteria C, which is the emergency response and
25 resources, we have the only clarification we

1 needed on C-1C. So we don't have anything else to
2 discuss under C.

3 Planning criteria D, Emergency
4 Classification System, at least from an inadequate
5 point of view there were none. There may be one
6 later on in the second chart when we get to that.
7 I didn't get to that or correlate them together.
8 We address inadequate from adequate, the necessary
9 fixes separately.

10 Planning criteria E, Notification
11 Methods and Procedures. Again, as far as inadequate
12 we did not see any there.

13 Planning criteria F, Emergency
14 Communications, we do have a few to talk about. I
15 think we have generally talked about it earlier,
16 but let me make sure I have it right. We stated
17 earlier we were going to put some discussion in on
18 the new FRERP -- I was just getting used to master
19 plan -- what we intended, as I previously stated,
20 was to put a summarization in of that, and in OPIP
21 3.3.2 notification, we are including for the
22 director of Local Response to call those agencies
23 with an asterisk, if required.

24 I think we have discussed that.

25 Q. Turning next to planning criteria I,

1 which is Accident Assessment. There are a couple
2 of things in here we would like to discuss. One
3 being the concept of PARS, Protective Action
4 Recommendations, based on potential degradation of
5 plant conditions. We intend to address that in
6 two methods.

7 First, we have a new position in LERO
8 envisioned for the next amendment entitled "Nuclear
9 Engineer. That service will be provided by a
10 contractor, and they are providing a qualified
11 person to fill that position on a 24-hour basis,
12 similar to what we do with our radiation health
13 coordinator.

14 As a matter of fact, it is with the
15 same firm.

16 We also will modify OPIP 3.6.1 to
17 include a chart that is used as part of the on-
18 site plan which has predetermined protective
19 actions to be considered when a general emergency
20 is considered. It has four ranges. It is a
21 chart -- I don't have it here -- it is a chart
22 that has three columns: The protective actions,
23 core conditions, et cetera. That is what he would
24 be using to analyze an emergency based on a
25 machine status rather than radiological status.

1 MR. KELLER: My suggestion is you not
2 only revise OPIP 3.6.1, when you talk about who
3 interacts with LERO, this is spliced in there also.

4 MR. DAVERIO: I believe OPIP 3.6.1 is
5 where that would occur.

6 MR. KELLER: You also have the concept
7 7 operations and he has to be factored in.

8 MR. KELLER: I think also that in
9 your -- I forget which OPIP it is, where your job
10 descriptions are, that his qualifications ought to
11 show up there.

12 MR. DAVERIO: What we will do when the
13 contract is normalized, it will go into B with the
14 resumes of the people to fill that position.

15 MR. KELLER: You have the thrust.

16 MR. DAVERIO: Moving on, the thrust we
17 got of what we have as parenthetical two, and let
18 me see if I can --

19 MR. KELLER: Page 23 of the RAC review.

20 MR. DAVERIO: Thank you. 28 of the
21 RAC review. We interpret this to be the statement
22 in our procedure that says that if there is no
23 core damage, don't worry about reading the filter
24 paper where particulate matter might be picked up.

25 MR. AIDIKOFF: I-9.

1 MR. KELLER: You jumped to I-9?

2 MR. DAVERIO: Sorry, I did. It is I-9.

3 I am on that one. Excuse me.

4 MR. KELLER: Fine.

5 MR. DAVERIO: It was our understanding
6 that the concern was that there may be an
7 elemental iodine, or some particulate matter that
8 might be on that filter that we weren't taking
9 account of, and our procedure would be modified to
10 remove that statement so you always check the
11 paper for particulate matter.

12 MR. DAVERIO: Is that the thrust of
13 what RAC was looking at?

14 MR. KELLER: That's the thrust, yes.
15 For that part. You have more the next page.

16 MR. DAVERIO: There is a second page.
17 The second part is I-9-3, I believe, which is the
18 "furthermore" statement, which follows the
19 statement we have just discussed. It falls under
20 two and three, I guess, and it relates to the
21 nomogram that we have in our procedures.

22 The first one, and this we will
23 discuss for awhile, we are not exactly sure what
24 you have listed in the bunch of parameters, and
25 maybe RAC could explain how they see those

1 parameters.

2 It is the end of the full paragraph,
3 "Such as moist filtration, distance from the site,
4 et cetera." We are are not sure what all that
5 means, particularly "et cetera."

6 MR. KELLER: I think that your
7 resolution covers it. When you prepare a nomogram,
8 this is simply a way to multiply numbers together
9 graphically, right?

10 MR. DAVERIO: That's correct.

11 MR. KELLER: You had to make certain
12 assumptions to establish a slope of the name on
13 the nomogram, is that right?

14 MR. DAVERIO: Yes.

15 MR. KELLER: What this listing of
16 parameters at the end of the RAC comment on page
17 29 alludes to is the fact that those parameters
18 may affect the assumptions that you have used to
19 make your nomogram. I think what you say in your
20 resolution is you are going to put the assumptions
21 in. So now we know where these things came from.

22 Now, insofar as the assumptions you
23 used differ from an accident you may have, there
24 is going to be a bias introduced by the nomogram,
25 and hence the last line in the RAC comment.

1 I think we have addressed this in
2 another place -- again all of this is intertwined
3 as you recognize -- we have suggested that you
4 expedite the return of sample media to your place
5 of analysis. And it is this suggestion which
6 helps you out of this dilemma. Because in the
7 field you are there making rapid assessment.

8 However, recognizing there may be
9 some bias introduced, you get those samples back
10 for further analysis as quickly as possible.

11 Later on, and I can't remember where
12 it is, we have a suggestion that you expedite that.
13 I think your resolution looks reasonable at first
14 blush, that you are going to list assumptions.

15 MR. DAVERIO: It is an overall
16 response, the on-site emergency planning
17 organization uses the same thing and they probably
18 would be getting it back to their on-site lab fast
19 and we would have that data to work from. We also
20 have a post accident sampling system, they have
21 samples that would give you a feel from the site
22 as to what mix you might have.

23 So you do have ways of getting it.

24 MR. KELLER: I understand. The other
25 thing I think should be factored into this, that

1 you only need to worry about this concern above
2 some trigger level. If the doses that you project
3 are 1 j MR, 2 MR, there is no great need to do
4 anything. If you are projecting on the order of 1
5 REM or 5 REM, something like that, then you might
6 want to have a trigger level to expedite this
7 particular filter analysis.

8 MR. DAVERIO: I think that's very
9 helpful and we understand what we have to do to
10 resolve that.

11 Moving on to what we have as I 10-2,
12 which is contained on RAC comments page 30, about
13 the deposition velocity, we believe, as we state
14 on our matrix, we believe that is a conservatively
15 high velocity. What it is really used for is to
16 get your field teams to potentially the right
17 places.

18 We also have suggested we will add an
19 HP 210, four ground deposition surveys once we got
20 there.

21 MR. KELLER: I agree that's a high
22 deposition velocity. The only difficulty I see is
23 that if you use a very high deposition velocity,
24 in order to maintain material balance, you put too
25 much down in close and, therefore, you project

1 less further out.

2 Just consider the options.

3 MR. BORES: When you are dealing with
4 wet deposition, of course the .05 may not be
5 conservative.

6 MR. DAVERIO: Wet deposition would be
7 something you would know about, though, because
8 you know it would be raining probably.

9 Are you talking about some other type
10 of wet deposition?

11 MR. BORES: But you are still
12 calculating a deposition and, first of all, you
13 don't know whether anything is deposited. You
14 have to know what the releases are to find out
15 what form they are in to find out whether or not
16 they are deposited. So .05 may or may not be
17 conservative.

18 MR. KELLER: The major thing is you
19 have added a field survey with your
20 instrumentation. Be aware of the calculational
21 assumptions.

22 MR. DAVERIO: What we understood by it
23 is it pays to start looking. It may not be a
24 perfect place but it is an estimate of where to
25 start. If you found you were way off, you would

1 adjust what you were doing.

2 I think that helps us.

3 That completes any discussion we had
4 on planning criteria I.

5 Moving to planning criteria J,
6 protective action -- did you have any questions
7 before we move on?

8 MR. KOWIESKI: No.

9 MR. DAVERIO: Sorry. J.2-1 I guess is
10 the first place. This is one that has caused us
11 some confusion, particularly because as far as the
12 LILCO on-site plan, which I think is what you are
13 talking about, when we evacuate any of our on-site
14 people there are alternative sites within the site
15 to miss the plume, but the plan always takes them
16 up one access road.

17 What we intend to is to write
18 something in the plan that says that. By the
19 makeup of our site, that's the plan that we have
20 had.

21 The reason for that is we have a
22 remote decon center about a mile away at a
23 substation which is on our access road, which we
24 make everyone go by. It is on the main road out
25 the site. they may not stop there, of course, if

1 the plume is there. We may send them to other
2 remote locations but they all go out that one way,
3 always.

4 That's what we are going to put in
5 the plan.

6 MR. KOWIESKI: Your response appears
7 reasonable, if you can state this in the plan.

8 MR. DAVERIO: The next one we would
9 like to discuss or get clarification, if possible,
10 on, or maybe some help is J10 B-1. It is on page
11 32 of the RAC comments, page seven of our table,
12 and it talks about "Subarea boundaries for
13 evacuation."

14 Maybe if I have a moment I will
15 explain it. The evacuation plan, we would never
16 evacuate a subarea within F. You either evacuate
17 all of F or none of F.

18 The only reason we have subareas is
19 twofold. One it simplifies the bus routes for F
20 because F is a very large area, so is K which is
21 the other one you have referenced.

22 Secondly, because of its large area
23 it broke out that way for access for people in
24 those subareas to get to the major evacuation
25 routes. We have no plan ever to evacuate a subarea.

1 It is either all of F, all of K, or none of each
2 or those. That's what stated in appendix A. More
3 public relations than to be put in the protective
4 action brochure.

5 MR. BALDWIN: The background of
6 information you have given us we could not find in
7 the plan.

8 MR. IRWIN: It seems like the comment
9 was proceeding based on a misapprehension of what
10 was required.

11 MR. DAVERIO: I can put the statement
12 I made into the plan. We didn't intend to make a
13 modification.

14 MR. BALDWIN: When we evaluated the
15 plan we saw the breakdown for areas F and K, and
16 we were looking, therefore, for a breakdown on the
17 large map, the fold-out map, which would then have
18 led us to the correlation in the plethora of maps.

19 MR. DAVERIO: We can put a sentence or
20 two in that summarizes what I said in probably
21 eight sentences.

22 MR. BALDWIN: And it should be in the
23 cross reference, too. That gets us to all of it.

24 MR. DAVERIO: Yes.

25 One we need clarification on, J 10 B-2,

1 which is the last sentence on page 32 of the RAC
2 comment. Are you just looking for a map that
3 shows the population in each zone? Because what
4 we have is a table and a map. You would like the
5 numbers on that table to appear on the map?

6 MR. BALDWIN: With this clarification,
7 you see, now it becomes evident how it fits
8 together.

9 MR. DAVERIO: We have the map done, so
10 it is not a problem.

11 MR. KOWIESKI: So you will have
12 numbers, population distribution indicated on the
13 map?

14 MR. DAVERIO: Both in a tabular form
15 and on the map.

16 MR. AIDIKOFF: In each zone.

17 MR. KOWIESKI: The NUREG requires both,
18 the table and the map.

19 MR. DAVERIO: First we would like to
20 talk about J 10-E, one and two, which basically is
21 the issue of potassium iodide.

22 MR. KELLER: It is shown at J 10-C on
23 here.

24 MR. DAVERIO: It should be J 10-E.
25 The C was a typo. It is contained on page 34 of

1 the RAC review comments.

2 Our plan, in the next revision, we
3 will give one tablet to each worker as they leave
4 the staging area to go into the field. As also
5 stated, our tablets right now have an expiration
6 date marked or June 1985.

7 MR. KOWIESKI: The last ones we knew
8 were out of date.

9 MR. AIDIKOFF: We contacted them.

10 MR. KELLER: No problem.

11 MR. DAVERIO: Moving to J 10-H, which
12 appears on page 37 of the RAC review. Based on
13 discussions with the Red Cross, we are in the
14 process of modifying the plan because of their not
15 being able to get letters of agreement with, my
16 understanding, Stoney Brook or Suffolk County
17 Community College. They do have an agreement with
18 BOCES, they have told me, and they have three
19 other places that they have agreements with, all
20 of which are greater than 15 miles away.

21 So the next revision to the plan will
22 show no relocation centers less than 15 miles from
23 the site, approximately.

24 I think the nearest one is
25 approximately 16 miles.

1 The Red Cross has told us those four
2 are Saint Joseph's, BOCES, Islip, Downing College,
3 and SUNY, Farmingdale. The plan will be modified
4 to reflect that in its entirety.

5 MR. BALDWIN: That's responsive. What
6 we would also like as an aside to this, several
7 people have mentioned, and I can speak for myself,
8 I would like for you to supply a map for scale and
9 the locations of these relocation centers on it.

10 MR. KOWIESKI: That's very important.
11 We try to use engineering skill and there is no
12 way to determine the distance of various
13 relocation centers on the map from the plan.

14 MR. DAVERIO: We will take care of
15 that.

16 I guess the next one that we would
17 like to discuss is J 11-2. Actually it is one,
18 two, three and four, which basically are ingestion
19 pathway issues. They are on page 41 of the RAC
20 comments.

21 I guess the first one is we are not
22 aware, from our maps and our scales, that Rhode
23 Island is within 50 miles. I think it is about 60,
24 and we did not intend to include it in the
25 ingestion pathway.

1 MR. KELLER: Agreed. If you look at
2 the RAC comment, not this one but later on, it was
3 in one of the earlier plan revisions. And since
4 there is no map of 50 mile EPZ in the plan, we
5 couldn't tell whether it was 50 miles or not.

6 We have since made some measurements
7 and we agree it is greater than 50 miles. However,
8 I might suggest that you might want to put a map
9 of the 450 mile EPZ in the plan.

10 MR. DAVERIO: J 11-2 talks about
11 imposing protective procedures, such as
12 impoundment. What we intend to do is we have a
13 letter that Connecticut has written to New York
14 State basically saying that they would respond to
15 a utilities or a licensee's request for assistance
16 in the ingestion pathway.

17 So as far as Connecticut is concerned,
18 we would assume the Connecticut plan would be the
19 applicable document based on that letter.

20 Within the New York State boundaries,
21 the next revision to the plan will identify that
22 we will issue radio messages identifying the areas
23 of concern and offer to compensate anyone with
24 economic loss due to withholding that food from
25 the market.

1 In addition, aid could come through
2 the federal response also.

3 MR. KELLER: I think what you are
4 saying is reasonable and that will be included in
5 the plan, this expansion?

6 MR. DAVERIO: Yes.

7 MR. KELLER: If you have this letter
8 from Connecticut, it belongs in B.

9 MR. DAVERIO: Yes. We got that since
10 the last revision to the plan.

11 MR. DAVERIO: If I wasn't clear, the
12 letter from Connecticut is to New York State
13 saying it would respond to a licensee's request;
14 it is not to LILCO. We will include that letter
15 in the next revision to the plan. Just for
16 clarification.

17 MR. KOWIESKI: We would need a letter
18 from Connecticut to you saying that they will
19 respond to your request.

20 MR. DAVERIO: As was pointed out to us,
21 when we asked for that letter they sent it to New
22 York State. I don't know if that's because they
23 reel that's the proper protocol. But they may
24 tell us the proper protocol is to write that
25 letter to New York State.

1 MR. KOWIELE: We have to evaluate the
2 letter.

3 MR. DAVERIO: We will provide that
4 letter to you in the next revision for your
5 evaluation.

6 Turning next to the comment we have
7 as parenthetical three, we have worked up over 60
8 payments of listings of dairies, farms, food
9 processing plants which are or will be in the new
10 3.6.6. We also have, for use in our EOC, a map of
11 a 50 mile EPZ boundary, with all of them located
12 by colored coordinated dots and a manual that
13 tells you what each of them are.

14 Those were gotten through working
15 with the Suffolk County Agricultural Extension
16 Office and using computer lists that they provided
17 to us, and then verifying those lists.

18 MR. KELLER: Your resolution appears
19 responsive.

20 Is it possible to supply to RAC a
21 copy of this map or a reduced version of it?

22 MR. AIDIKOFF: I can right now supply
23 you with the 60 pages of listings which correlate
24 to the map. The map is about the size of this
25 board.

1 MR. IRWIN: We will make a photograph
2 of it.

3 MR. DAVERIO: The problem is what we
4 have done on it is correlate the different
5 facilities in different colors, and it is a hard
6 board that we did. We can make a 35 millimeter
7 slide of it for you.

8 The next one we would like to talk
9 about is what we call parenthetical 4, food
10 processing plants outside the 50 mile EPZ, which
11 which process food originating. What we have
12 tried to do is the food processors in the listing
13 that I have discussed are 70 miles from Shoreham.

14 We think this is an appropriate
15 response since we don't feel much will be grown
16 inside and sent outside to be processed and
17 shipped back to New York. By including the extra
18 20 miles we think we can address the RAC's comment
19 about food being sent out to be processed and then
20 sent back in.

21 MR. KELLER: I don't think you
22 misunderstood our problem, I don't think.

23 MR. DAVERIO: J 12-2 would be the next
24 one, on page 42, the second paragraph. Based, on
25 what we state as page 9 of our table, we have 90

1 radiation monitoring persons deployed to the
2 relocation centers. Assuming about two minutes
3 per monitor, to monitor a person, we envision you
4 could do approximately 32,000 people in twelve
5 hours, which is more the 20 percent of the EPS
6 which the relocation center capacity is
7 established for. That's for a full ten-mile
8 evacuation.

9 The RAC comments seems to say it is
10 questionable that it can be done. What I am
11 looking for is as to why that is questionable or
12 what did RAC have in mind?

13 MR. KELLER: Some of these people in
14 relocation centers are monitoring vehicles,
15 according to your plan.

16 MR. DAVERIO: I believe the procedures
17 have them worrying about people first.

18 MR. KELLER: All we are saying is to
19 evaluate, and as you are going to include some
20 kind of design basis on how many extra drivers you
21 are going to have, put in a rationale of how you
22 got there from here.

23 MR. DAVERIO: I think the plan right
24 now has some of that prioritization in it. I
25 think it says you park the cars in an area, do all

1 the people and worry about the cars later. We
2 will go back and look at it and make it clearer if
3 there is a problem.

4 MR. KELLER: Cars are one thing, then
5 you have monitoring for contamination. If people
6 are found to be contaminated they go under a
7 shower and they are remonitored. That's separate
8 from the people coming in.

9 What we are saying is, at least the
10 way we look at it, it was questionable whether you
11 had enough there to get the job done. What your
12 design basis, what your assumptions were would be
13 helpful to be put into the document.

14 MR. DAVERIO: We will put more of the
15 logic and background in the plan.

16 MR. DAVERIO: One --

17 MR. KOWIESKI: Off the record.

18 (There was a discussion off the
19 record.)

20 MR. DAVERIO: J. 12-4, I guess the
21 problem we have with that is the Red Cross has a
22 890-page document on disaster services regulation
23 procedures, disaster health services, ARC 3050
24 that they give us when we asked for this. Is that
25 what you are looking to be put into our plan, or a

1 reference to it, or something?

2 MR. KELLER: Your four, five and six
3 kind of are meshed together.

4 MR. AIDIKOFF: No.

5 MR. KELLER: Again, back to the
6 discussion from this morning, the American Red
7 Cross runs these centers but there is a LERO
8 function going on at the centers. How is that
9 interface tied together? Do the LERO people
10 report to the Red Cross people, do they report to
11 LERO? What is that interface, which we couldn't
12 find in the plan?

13 Secondly, this registration form, you
14 do talk about what you are going to do with people
15 who are found to be contaminated. We think it is
16 equally important to have a record of people who
17 were examined and found to be not contaminated.

18 Part of your problem is that you have
19 a clean tag, which is new. That's just part of it.

20 MR. DAVERIO: I think we understood
21 that. If it is not the ARC 3050 document you want
22 but if you want a command and control statement
23 between the two organizations, we then understand
24 what you are looking for.

25 MR. KELLER: Yes. I think if you go

1 back to the RAC comment it says "more information
2 needed on Red Cross responsibilities and
3 procedures in the centers."

4 In light of fact you have these two
5 functions at the center.

6 MR. IRWIN: What does LERO do and what
7 does Red Cross do, and if there is is a point of
8 interface.

9 MR. KELLER: Yes. Another thing comes
10 to mind which may or may not be in the training
11 session. Because of this interface, as you have
12 stated the American Red Cross routinely runs
13 relocation centers and does a fine job, no
14 question about it. But this is a little bit
15 different situation because of the interface with
16 LERO functions. This may get into a training
17 aspect.

18 MR. DAVERIO: What has occurred in our
19 training program, we produced a film on relocation
20 center operation and activation, which the Red
21 Cross told us how to do and it was all Red Cross
22 people doing it, that we train our LERO people
23 with.

24 MR. KELLER: We would like to see in
25 the plan how the interface works, and if there is

1 an interface, make sure the training is
2 appropriately listed.

3 MR. DAVERIO: We will take care of it.

4 Turning to planning criteria K,
5 Radiological Exposure Control. I figure we could
6 probably get through K and then maybe break.

7 I think we will discuss K and as we
8 have four items to discuss, that will probably
9 take us to five to 12.

10 MR. KOWIESKI: How many more questions
11 do you have on L, M or O? This will guide us as
12 to whether we should break for lunch around 12 or
13 finish.

14 MR. IRWIN: I think it would be
15 sensible to break for lunch simply because we want
16 to try to take up the conditional approval stuff,
17 and there is no way we will be able to get through
18 all that...

19 MR. KOWIESKI: That's what we are
20 saying. If we can finish with whatever was graded
21 inadequate and then break for lunch and start
22 fresh.

23 MR. DAVERIO: K 5A-3 is the first one,
24 which appears on page 45 of the RAC comments. I
25 guess the problem we have is we don't know of any

1 other federally or any approved limits to put into
2 the plan except those contained in Reg Guide 106,
3 and are looking for clarification or guidance as
4 as to what you meant by not using those numbers.

5 MR. KELLER: I am just trying to
6 figure how you broke your one, two, three down
7 here.

8 MR. DAVERIO: Three is the last
9 paragraph.

10 MR. KELLER: What we are trying to say
11 is you have two tables, 391 and 392.

12 MR. DAVERIO: Right.

13 MR. KELLER: 392 are the contamination
14 levels taken out of Reg Guide 1.86, which is the
15 release of licensed activities.

16 What we are saying is in 391 you have
17 one level of contamination. You have a person who
18 is contaminated if the count rate exceeds 120
19 counts per minute. It is a long way from 120 to
20 what you say is acceptable for release.

21 What I am saying is there is a
22 divergence between what you say is contaminated
23 and what you say is acceptable to be released and
24 reused.

25 MR. AIDIKOFF: What we are trying to

1 explain here on 392 is -- it is not so much for
2 release; it is for re-entry for buildings and
3 areas as opposed to a person coming into a
4 relocation center for monitoring and then
5 subsequent release after decon. We would
6 appreciate guidance.

7 MR. KELLER: There is an EPA group who
8 is currently developing recovery re-entry,
9 relocation, restaffing guidelines. To my
10 knowledge, and maybe George can help, there are no
11 specific numbers available as of yet.

12 I think we understand the problem,
13 there is no guidance, as except for this 1.86.

14 That is a very low number. I think
15 the point we were trying to make in the RAC
16 comment is that we seem to see a divergence of
17 what you call contaminated and what you call
18 acceptable to release, because I think those words
19 are in the plan.

20 MR. AIDIKOFF: I agree. We can
21 clarify that.

22 MR. KELLER: That's the RAC comment.

23 There is another issue that we would
24 like to have some guidance on, and that is what
25 would be acceptable numbers, and I am not going to

1 answer that.

2 MR. BORES: One of the problems with
3 using 1.86, it has been designated for use as
4 decommissioning facilities. By definition this is
5 long-lived stuff, been there for years and years;
6 whereas in an accident situation you may have a
7 population which has been relocated or dislocated,
8 if you will, and you need to get those back in to
9 avoid economic type concerns as well as get the
10 families back together where they belong, that
11 sort of thing.

12 The second aspect is in an emergency
13 type situation I would guess the bulk of the
14 activity might be short-lived stuff. So you might
15 be dealing with a different spectrum of activity.
16 They are two different things.

17 Whereas the other you have a long
18 time, not an emergency situation, with 1.86. I
19 know some of the states have developed some
20 re-entry criteria and maybe that's the way you
21 ought to look at it. Based on the potential
22 exposure, RAD exposure or REM exposure over the
23 next six months, over the next year based on
24 re-entry.

25 In other words, you move people out

1 based on an exposure potential or the savings
2 potential when you enact the PAGs.

3 So they are looking at the same sort
4 of concept when you move them back in. The
5 numbers might be lower, but you may also, in those
6 numbers, weigh the specific aspects of the given
7 accident. So it is based on exposure rather than
8 contamination levels.

9 MR. AIDIKOFF: Instead of DPM value
10 you are looking for an assumed exposure value for
11 six months or twelve months, a dose rate at that
12 point assuming continuous exposure?

13 MR. BORES: If you have short-lived
14 material, decay rate, weathering, whatever it is.
15 But you ought to lay out the criteria or the
16 assumptions that you are going to be using for
17 that.

18 MR. AIDIKOFF: One quick question. A
19 recent FDA document, 1983, refers to some
20 Department of Transportation values in millirem.
21 I am wondering if you are aware of that. They are
22 saying there is kind of nothing we know about it
23 except for transportation accidents and then it
24 gives something.

25 MR. KELLER: Is this Schlein's

1 document?

2 MR. AIDIKOFF: Yes.

3 MR. BORES: I can't comment on it.

4 MS. FELDMAN: Joyce Feldman. I would
5 add one thing. As far as the EPA draft that was
6 handed out to the Conference of Radiation Control
7 program members, the thrust there is to project
8 total dose for long term exposures. So you would
9 be depending on the nuclides and based on
10 information on what has been released and what has
11 been deposited in areas rather than any specific
12 count rate or dose rate, because you are looking
13 long term.

14 MR. AIDIKOFF: You are looking at long
15 term dose. Do an isotopic analysis?

16 MS. FELDMAN: Yes. This is a decision
17 that wouldn't be made in a 24-hour period.

18 MR. KELLER: These tables appear at
19 two places in the plan, and the discussion is fine
20 and valid. But we jumped from decontamination of
21 emergency reworkers to recovery/re-entry. This is
22 decontam levels for emergency workers.

23 MR. AIDIKOFF: We will clear that up.
24 I agree with that.

25 MR. KELLER: We just jumped into M.

1 MS. FELDMAN: I am sorry.

2 MR. AIDIKOFF: Thank you for your
3 point.

4 MR. DAVERIO: The next one we would
5 like to discuss is K 5-B, parenthetical two, which
6 appears on page 46 of the RAC. We are not exactly
7 sure what the concern is over alpha activity --

8 MR. KELLER: Because your plan says
9 that probe detects alpha activity. I looked it up
10 again and it says that and I would like you to
11 take it out.

12 MR. DAVERIO: That's fine.

13 MR. KELLER: Since it is incorrect as
14 your modification says.

15 MR. DAVERIO: We will fix that.

16 The next one would be K 5 B-3, we are
17 going to modify the plan to talk about sending
18 decontamination equipment supply storage or water,
19 I guess, would be there, to the Shoreham site to
20 be used -- excuse me.

21 (There was a pause in the proceeding.)

22 MR. DAVERIO: We are going to use the
23 Shoreham site to handle solid waste. As just
24 pointed out to me we would try to dilute the
25 liquid waste and dispose of them. If they

1 couldn't be diluted, then they would be shipped to
2 Shoreham.

3 MR. KELLER: The comment says you have
4 not addressed what you are going to do with waste.
5 Your resolution says it.

6 MR. DAVERIO: The next one would be K
7 5 B-5. I guess the clarification we wanted is
8 that this appears under a section that's really
9 talking about kits. Are you just looking for us
10 to provide places where first aid kits would be
11 available in the EOC, the staging areas? Is that
12 the type of information you are looking for to
13 close this one out?

14 MR. KELLER: If you go back to the
15 criteria elements, it may help clarify the RAC
16 comment.

17 MR. DAVERIO: We read that provision
18 to be addressed by our procedure 4.2.2.

19 I am sorry, 3.9.2.92 is
20 decontamination and 4.2.2 is transportation.

21 MR. KELLER: It may be that this can
22 be addressed by a revision in the cross reference
23 and an explanation. But it seems to me, when I
24 read K 5-B, that you ask for means for
25 decontamination purposes, including wounds,

1 supplies, et cetera. We understand you are not
2 going to do hospital type things but first aid
3 kits. Do you have that available?

4 MR. DAVERIO: If you look at the
5 facilities at LILCO -- and there are first aid
6 kits there -- if you are looking for us to say
7 that and provide detail what's there, we can do
8 that.

9 MR. BALDWIN: I think the cross
10 reference shows the equipment list in the
11 procedures is very detailed. So that would be
12 helpful.

13 (There was a pause in the proceeding.)

14 MR. DAVERIO: I Won't go through L
15 because we have no questions for RAC on L. I
16 think some of M-1 we have already discussed and we
17 don't need to go into it anymore.

18 The next place is M-4. I guess while
19 we say in the comment there we have a procedure,
20 let me phrase a question. Are you looking for a
21 procedure that is done during the event or are you
22 looking for us to have a model that would allow us
23 to, in hindsight, go back and calculate this?
24 Because we have a procedure now --

25 MR. BORES: Yes.

1 MR. DAVERIO: That helps.

2 MR. KELLER: This is a recovery and
3 re-entry criterion element, planning standard. It
4 is primarily what you are going to do. My
5 recollection of what we could find in the plan you
6 said, you would establish a group to do this.
7 That really leaves a little thin how you are going
8 to do it.

9 MR. DAVERIO: Let me explain my
10 problem. There are two methods of doing it, in my
11 opinion. The one we have got -- I am trying to
12 get some guidance of what you think on the issue.
13 I am not saying it is the final. Trying to
14 calculate the total population exposure during the
15 event. That would be taking the evacuation
16 coordinator and every hour try to have him
17 estimate what is happening out there.

18 The second method of doing it would
19 be something like using an acronym, the MIDAS
20 system, which has the transportation mode on top
21 of it and at the end of an accident you put the
22 inputs in and you get a number out.

23 I am not sure which methodology the
24 RAC Committee is looking for.

25 MR. KELLER: A methodology rather than

1 none. This is your plan, right?

2 MR. DAVERIO: Yes.

3 MR. KELLER: The criteria element is
4 specific, which says there should be a way to
5 estimate the population exposure. We couldn't
6 find it in the plan.

7 MR. DAVERIO: We have two options. We
8 will to choose one and put it in our plan, I guess.

9 MR. BORES: Let me indicate, in terms
10 of population exposure evaluations, there may be a
11 number of methods tied together because not one
12 method is probably going to get everything you
13 need. There will be refinements but there
14 probably should be some estimate during the event
15 as well as the overall picture.

16 By the time you get to the overall
17 picture there will be 50 estimates provided by 50
18 different organizations.

19 MR. DAVERIO: After an event everyone
20 will have our own estimate of what happens.

21 MR. AIDIKOFF: Part of the input we
22 need is how do you project this number being used,
23 and that would give a time requirement which would
24 give us an indication of what method would be more
25 appropriate.

1 MR. KELLER: I think the criteria
2 element says that you have to describe a method.

3 MR. AIDIKOFF: All right.

4 MR. BORES: If you are looking at a
5 frequency, I don't believe an hourly estimate is
6 going to be practical because your data is going
7 to be -- it is going to take you longer than that
8 to gather the data, so you are not going to be
9 precise anyway.

10 So you probably should be looking at
11 it daily, or something.

12 MR. DAVERIO: I think based on where
13 we are, we could probably finish within the next
14 five minutes, but we would like to take a minute
15 just to talk before we go on.

16 (There was a pause in the proceeding.)

17 MR. DAVERIO: We are ready.

18 We have one general one to cover
19 which we would cover as part. 01-B. That one
20 appears many times, or at least three times that I
21 can recall across the comments. It has to do with
22 local law enforcement agencies and fire
23 departments, and other people, and snow removal I
24 think is another one that appears somewhere in
25 her-.

1 We would like to cover, and
2 everything that was in the RAC Committee on that,
3 at this point, and not just the training. Because,
4 as I said, they do jump around somewhat.

5 As stated in our plan we do not rely
6 on these agencies just mentioned to do anything
7 than their normal function. Therefore, we did not
8 include letters of agreement with them. Though in
9 the next revision to the plan we will make the
10 offer to train them if they so desire to be
11 trained. We still do not see the necessity to get
12 letters of agreement with them. We will offer
13 them training, as stated in our column there, but
14 we don't see a need for the letters of agreement.

15 MR. IRWIN: Maybe the police
16 departments and fire departments and your local
17 fire departments on Long Island and snow removal
18 fall into different categories analytically. The
19 one thing that is common to all of them is that we
20 don't rely on any of them to perform any special
21 radiologically related duties, and we don't ask
22 them to undertake any special radiological risks
23 or to expose themselves to radiation in any
24 fashion different from the general public.

25 That's the framework or the backdrop

1 against which we perceived -- in addition to the
2 fact that the Suffolk County Police Department as
3 an agency of Suffolk County is not going to
4 cooperate with us in any event, or has not
5 indicated they are willing to, I think it is
6 important that you realize we aren't relying on
7 them for any radiologically related duties.

8 That's the backdrop against which all
9 of these comments are framed and maybe we ought to
10 take them one-by-one. That's the reason we don't
11 have letters of agreement with them or any other
12 special arrangements.

13 MR. DAVERIO: Also in response to the
14 RAC's earlier comments, we are including if they
15 did respond, decide to respond, and how they could
16 do it, as an early comment on it. That's a
17 separate issue.

18 MR. BALDWIN: There are really three
19 issues here that we have identified. The first is
20 that NUREG specifically says that these groups,
21 local response agencies --

22 MR. DAVERIO: Can you give me a page
23 reference?

24 MR. BALDWIN: Yes. 76,04 D and G,
25 local support services personnel will be trained.

1 MR. IRWIN: That's no problem since we
2 can offer training. You can lead a horse to water;
3 you can't necessarily make him drink. Some of
4 these agencies are, as you understand, agencies of
5 the Suffolk County government. The Suffolk County
6 government said it will not undertake any
7 cooperation with LILCO. We can offer them
8 training, but if they refuse to accept it there is
9 not much we can do about that. That's our only
10 problem.

11 We are happy to offer the training
12 and we think they know it. If they don't, they
13 soon will.

14 MR. KOWIESKI: That's our concern. If
15 you to rely on the police, Suffolk County police
16 or local snow removal agencies, firefighters, we
17 want to make certain they will be tried.

18 MR. IRWIN: There is a big word in
19 there, two letters long, and that is "if." The
20 important part of our plan is we don't rely on
21 them to perform any duties, other than their
22 normal duties under conditions where the general
23 public would be allude to be where they are
24 physically going to be. That's an important
25 threshold matter.

1 MR. BALDWIN: That comes to our second
2 concern. The language in the text does not make
3 those assumptions clear enough and specifics
4 enough.

5 MR. IRWIN: All right.

6 MR. BALDWIN: And the third issue is
7 one that is addressed in that response, and that
8 is the if they are required to perform their
9 normal duties under the conditions of a
10 radiological release, they need to be supplied
11 with radiological equipment, dosimeters, CLDs,
12 they need to know how to read them and they need
13 to know what risks they are exposing themselves to.

14 MR. DAVERIO: Do they have to know how
15 to read them or do we have to provide coverage for
16 them, or is that the same thing?

17 MR. KOWIESKI: They have to understand
18 the procedure. At a certain level they have to
19 contact their supervisor and ask for direction as
20 to what to do, return, come back to the office, or
21 continue my duties?

22 MR. IRWIN: We can envision the
23 following kind of scenario. We continue as we do
24 now not to make any kind of assumptions that any
25 of these organizations will be available for

1 service in any area other than those which are
2 accessible by the general public in an emergency.
3 They don't fill any radiological functions.

4 Second, they will not agree to accept
5 any radiological training even though we offer it
6 at this point.

7 In the event of an accident there is
8 a possibility that the services these people might
9 be volunteer, and the question is how do we cover
10 that if they have not had advanced training
11 because they have refused to accept it or for any
12 other reason.

13 One possibility is that qualified
14 personnel could accompany them who know how to
15 read dosimeters.

16 That is in fact a way of providing
17 for them. That is one thing that we can consider.
18 We will do whatever we can. You can lead a horse
19 to water but you can't make him drink. That's the
20 problem we have.

21 MR. KOWIESKI: We again refer you to
22 the plan, page 2.2-4 entitled, "Local law
23 enforcement agencies and fire departments." This
24 language was a concern to us and we recommend this
25 has to be some clarified.

1 The way it stands right now it is
2 inadequate.

3 MR. IRWIN: We understand that kind of
4 concern. We can clarify it both to our degree of
5 reliance and with respect to offering training,
6 and if necessary back-up means to insure that
7 qualified personnel accompany these officials if
8 they do help us. We can do that.

9 Would this be a good point to break
10 for lunch?

11 MR. DAVERIO: I think that finishes it.

12 (There was a pause in the proceeding.)

13 MR. DAVERIO: No other discussion on
14 the totally inadequate sections. We have some
15 more on the adequate with modification sections.

16 MR. KOWIESKI: I recommend that we
17 will break for lunch for approximately an hour and
18 a half and convene 1:45. Is this acceptable to
19 everyone?

20 (Luncheon recess)

21

22

23

24

25

1 A F T E R N O O N S E S S I O N .

2 MR. KOWIESKI: Are we ready to
3 reconvene our meeting? Is everybody here?

4 We can reconvene our meeting.

5 MR. DAVERIO: This afternoon we would
6 like to talk about the items that we interpreted
7 as graded adequate but necessary revisions were
8 recommended or required to make the item adequate.

9 MR. IRWIN: These are the ones where
10 the words "adequate provided that" appeared.

11 MR. KOWIESKI: For the record, I want
12 to make it clear that this is adequate provided
13 you provide clarification or additional
14 documentation. You know what will happen if you
15 won't.

16 MR. IRWIN: We understand. In most
17 cases it was pretty clear what the RAC wishes to
18 do but there are two or three areas where we would
19 like to get clarification.

20 MR. DAVERIO: The first one would be E-5
21 and our page one of three of the second table that
22 we handed out this morning, 15 of the RAC
23 Committee.

24 Just to give you a little historical
25 information or how the words EBS were chosen, it

1 is my understanding from the people who worked for
2 us in setting up this system for LILCO, they went
3 to the local EBS Station, the designated EBS
4 Station for Long Island, which would be, I believe,
5 CBS in New York City. They did not feel that they
6 wanted to get involved. They recommended that we
7 try to set up a local EBS Network.

8 What we undertook, and I believe our
9 people talked to the regional EBS Coordinator, was
10 we undertook discussing the concept of a local EBS
11 with the radio stations in Suffolk County. As we
12 state here, we believe we don't have to change the
13 use of the words EBS Based on our reading of the
14 FCC regulations and their use of the words EBS.

15 Don Irwin may want to add some legal
16 interpretations. He is trying to read the
17 regulation right now.

18 MR. IRWIN: I think it is fair to say
19 that the FCC regulations distinguish between a
20 local EBS network and a national or other kind of
21 broader EBS network than a local one. The
22 national network is set up as a result of an EBS
23 authorization issued by the FCC. The FCC's
24 regulation, if I understand them, in section
25 73.913 B, indicates that an EBS authorization is

1 not needed to set up a local EBS network. That's
2 the basis on which we have been proceeding.

3 As a practical matter, it is a
4 configuration of stations that functions, and you
5 know how it functions. What we are interested in
6 obtaining, first of all, is the nature of the RAC's
7 concern. Is it that we are using the name EBS
8 without proper authorization? Is it confusing or
9 what? Because we have a very practical
10 consideration; that is, the word EBS and the name
11 emergency broadcast system are just all throughout
12 the plan and procedure. We will probably have 500
13 changes in one kind of document or another if we
14 need to change it.

15 If we do in fact have to change we,
16 of course, will, but we want to make sure of the
17 basis which you all believe we should change it
18 before we make that kind of a global change.

19 MR. KOWIESKI: In our comments,
20 obviously we stated this concern that you already
21 discussed, the use of EBS, the term emergency
22 broadcast system, which was commonly used by state
23 or local government.

24 I think it would help somehow to
25 distinction, to make it very clear that this

1 system has been developed without cooperation of
2 state and local government.

3 Or I have a second option or
4 suggestion. If you could get a letter from FCC
5 stating that they don't have any objections to
6 usage of this term EBS as it stands right now.

7 MR. IRWIN: I think the regulations
8 are clear but we will also be willing to explore
9 that with the FCC. I don't know whether the FCC
10 typically issues opinion letters or that kind but
11 we will look into it.

12 MR. KOWIESKI: I cannot speak on
13 behalf of the FCC but you can ask them to
14 interpret the regulations.

15 MR. IRWIN: I just don't know what
16 their interpretation process is, but we will look
17 into it. We wanted to you to be aware that we do
18 have in fact a clear legal basis for using the
19 nomenclature we have used; and, B, that it is a
20 significant practical problem, although not a
21 substantive problem to change the name.

22 MR. KELLER: Would you repeat the
23 citation again? I think it was different than one
24 you have here.

25 MR. IRWIN: Three sections you ought

1 to look at. Those two which are cited in the
2 matrix which deal with the actual activation, and
3 those sections state that basically stations are
4 allowed to activate their stations for EBS
5 purposes if they are on a local network at the
6 local management's discretion.

7 The section I referred to is 73.913 B,
8 says that "An EBS authorization, which is the FCC
9 order, is not required in order to participate on
10 a voluntary organized basis in a state or
11 operational local area EBS."

12 MR. KELLER: 913 B?

13 MR. IRWIN: That's right. It is set
14 forth further in 73.945. So we think the three
15 tie in together.

16 MR. DAVERIO: The next issue we would
17 like to address is H-7 and I-7 at the same time.
18 They tie together. It is our intent to modify the
19 plan to clear this up. The plan may have been
20 what caused the confusion. There are actually two
21 sets of kits. There are a set of kits at
22 Brookhaven National Lab which are owned,
23 maintained, calibrated by Brookhaven National Labs
24 as part of RAP, the initial response. Because of
25 the location of Brookhaven National Lab within the

1 EPZ we have also procured and own, LILCO or LERO
2 kits, which we have store at our EOC which we
3 maintain, calibrate, and we will clear up the plan
4 to so specify that there is a difference and there
5 are two different sets of kits. They don't move
6 kits.

7 MR. KELLER: I think you know what we
8 were thinking. There was confusion in reading the
9 plan.

10 While we are on this, what we were
11 discussing this morning about the particular
12 filter measurements, that's at the end of my 7 I
13 see here.

14 MR. IRWIN: Yes.

15 MR. DAVERIO: We would like to go in
16 the middle of the two we just talked about, which
17 is H 11, and we designate two, which appears on
18 page 26 of the RAC comments. It appears or we get
19 that you are looking for communication radio link
20 between the field team and the EOC. In actuality
21 there is no radio communication between the DOE
22 Brookhaven teams and our EOC. The DOE told us
23 that they would prefer to leave the communications
24 chain between their field team to their
25 headquarters at the lab and then we have put in a

1 dedicated line from that position to where the
2 Brookhaven person or the DOE person would be at
3 our EOC.

4 We had discussions with Brookhaven on
5 this, and it is our understanding that that is
6 their preferred method. Because, if you remember,
7 I think one of the earlier revisions of the plan
8 designated a LILCO frequency for the downwind
9 survey teams. They did not want to proceed that
10 way

11 MR. KELLER: I don't think there is
12 any real problem. We do understand the primary
13 link will be between the field teams and their
14 headquarters with their own frequency and they are
15 not going to use your frequency. There is a
16 dedicated line from their headquarters. It is our
17 understanding the RAP team captain will have a
18 hand held radio on the same frequency, a DOE radio.

19 MR. DAVERIO: If they intend to leave
20 Brookhaven they intend to bring some hand-held
21 radio or some communications to the EOC.

22 MR. KELLER: The plan calls for the
23 RAP team captain to have a hand-held radio.

24 MR. AIDIKOFF: The next amendment the
25 RAP team DOE will send a representative to the EOC

1 who will deal via the dedicated line back to the
2 Brookhaven area office. The Brookhaven area
3 office does become unavailable, they will relocate
4 to the EOC and work out of there, bring
5 communications with them, and at some time that a
6 larger DOE-FEMA response gets set up somewhere
7 else, they will then relocate to that area.

8 MR. KELLER: There is the other issue
9 that there is the potential, at least, for LILCO,
10 LERO, to put out their own field teams. What is
11 the communication between those field teams should
12 they be put out?

13 I think that's what this comment is.

14 MR. DAVERIO: If you are speaking
15 about the LERO field teams and not LILCO field
16 teams, which is the on-site teams --

17 MR. KELLER: Not the teams required in
18 Element B.

19 MR. DAVERIO: There are no other
20 envisioned field teams except the DOE teams in our
21 plan.

22 MR. KELLER: We have a problem with
23 that. That's not what the plan says, and I can
24 find the reference if you would like, but it will
25 take me a moment.

1 MR. AIDIKOFF: The only field teams
that are referred to are --

3 MR. DAVERIO: We have a reference to
4 radiological environmental monitoring programs
5 that might go out later but I don't know of any
6 plume pathway tracking teams.

7 MR. KOWIESKI: Let's go to the plan.
8 (There was a pause in the proceeding.)

9 MR. KELLER: Do you have a copy of the
10 plan?

11 MR. DAVERIO: I have a modified
12 version. Tell me the page.

13 MR. KELLER: 352, line 2.3.

14 MR. DAVERIO: Mine doesn't read like
15 that.

16 MR. KELLER: Unfortunately we don't
17 have yours.

18 (There was a pause in the proceeding.)

19 MR. DAVERIO: In those words, when we
20 talked LILCO teams, we are talking about the
21 Shoreham teams.

22 MR. KELLER: Unfortunately it says the
23 ORS teams. The ORS teams are defined as the teams
24 that go into the plume, off-site radiological
25 survey teams. It says these will be augmented if

1 needed. We just read it.

2 MR. AIDIKOFF: You win.

3 MR. IRWIN: We can clarify that.

4 MR. DAVERIO: We have to clarify that.

5 MR. BORES: As a matter of fact, the
6 off-site teams -- apparently that's the reason for
7 the kits up at Brinkwood.

8 MR. KELLER: Why would you have kits
9 at the EOC if you don't have off site teams? We
10 thought it hung together.

11 MR. DAVERIO: The truth is those kits
12 were bought early on when we were going to give
13 them to Suffolk County. So he had extra kits.

14 MR. IRWIN: We will clarify that.
15 That's no problem.

16 MR. KELLER: Just a moment.

17 (There was a pause in the proceeding.)

18 MR. KELLER: Based on the discussion
19 that we had, it sounds to us as though there is a
20 significant change in the concept of operations or
21 how intend to work with the DEO, RAP captain in
22 particular, et cetera.

23 We think we heard something different
24 than what we think is in the plan now and, of
25 course, we will have to evaluate it when it comes

1 in but this may change lots of things.

2 What I am saying is if revision four
3 has things in it which do not address these things
4 directly, specifically, you may end up --

5 MR. IRWIN: Spawning a different kind
6 of review than otherwise.

7 What is the change in operational
8 concept that you are referring to?

9 MR. KELLER: To paraphrase, it seems
10 to me I heard you say that the DOE RAP captain may
11 not go to the local Brentwood office. I am sure
12 that the plan calls for a DOE RAP team captain,
13 dose assessment individual, environment assessment
14 individual, and DOS communicators to report to the
15 Brentwood EOC. I thought I heard you say a minute
16 ago you may only have a liaison there. That to me
17 sounds like an entirely different method of
18 operations.

19 Therefore, we are back into a review
20 mode again.

21 MR. DAVERIO: We can explain that to
22 DOE and see what they say. It was our
23 understanding they would like to maintain their
24 RAP team captain at the point of control of the
25 teams. That was why, as things evolved, they may

1 suggestions to us also on what they would like to
2 see happened.

3 MR. KELLER: This has evolved since
4 revision three?

5 MR. DAVERIO: I can't say. We will go
6 back and look at it and we understand if we make a
7 major change, you have to review it. We take no
8 exception to that.

9 MR. KOWIESKI: I would appreciate at
10 one point when you submit your plans to NRC, be
11 very specific and clear that what has been changed.
12 I am talking as far as concept of operations is
13 concerned. This will be very helpful to the RAC.
14 Otherwise it will be very hard to Fish and look
15 for it.

16 MR. IRWIN: I think what we will try
17 to do would be to incorporate a table that would
18 take at least a couple of the columns in this
19 matrix so that we will show the pages on which RAC
20 review elements had been attempted to be addressed,
21 and it will also be covered by a letter like the
22 one I wrote in front of Revision 3, which I hope
23 won't have to be long as that one.

24 MR. KOWIESKI: Somehow if you can
25 organize your letter, saying the changes in the

1 concept of operation, that's important to us.
2 Because we have to then rereview it.

3 MR. IRWIN: You say any changes other
4 than changes that are simply in response to the
5 RAC?

6 MR. KELLER: These also.

7 MR. IRWIN: We will highlight them.

8 MR. DAVERIO: We will go back and
9 review things in light of your comments.

10 I think we only have one more, and
11 that is N 2-D. It is our understanding from
12 talking to DOE that they would participate in an
13 annual practice, exercise and a FEMA-NRC exercise
14 and we will clarify that in the next revision of
15 the plan.

16 MR. KELLER: That's fine.

17 MR. DAVERIO: Let us just check our
18 notes but I think that about does it.

19 There was one item I was reminded of
20 and it is J 10-D. It is on the sheet we just went
21 through, J 10, the director of Noninstitutionalized
22 Mobilely Impaired Individuals.

23 What we have done is we mailed out a
24 card asking for anyone who needs assistance. We
25 have results back and have tried to make telephone

1 contact with everyone who said they needed
2 assistance, and those people we could not make
3 contact with we are mailing letters to.

4 The problem we have is I am not sure
5 that we would want to provide that list of people
6 in our plan.

7 Are you just looking for a format
8 that we will keep this list in and a concept of
9 how we will maintain the list?

10 MR. KELLER: And where it is.

11 MR. DAVERIO: We have the same
12 philosophy in an emergency callout list, which I
13 assume doesn't give anyone a problem. We don't
14 put everyone's home phone number in the plan, if
15 we can help it.

16 Now I think we are actually done.

17 MR. KOWIESKI: Are we checking
18 anything else or did you finish your presentation?

19 MR. IRWIN: I think we have finished
20 what we wanted to try -- the most important of the
21 areas that we wanted to try to bring up with you
22 all. I think that most of the rest of the RAC's
23 comments were clear enough that we think we know
24 how to go about addressing them. Whether we will
25 do it successfully or not will remain to be seen.

1 If questions arise I hope that we may
2 be able, on an issue-by-issue basis, or which I
3 would expect there would be very few, to try to
4 get informal clarification as we go along. I
5 don't think there will be much of this.

6 If the RAC has any observation is
7 they would like to bring up to us, we will be
8 happy to hear.

9 MR. KOWIESKI: Would you like to add
10 anything that was said today?

11 (No questions.)

12 This concludes the meeting between
13 the Regional Assistance Committee and LILCO to
14 discuss RAC comments on LILCO Transition Plan
15 Revision 3.

16 At this point we will conclude the
17 meeting and we will allow other parties, if they
18 are willing to make their points of view known to
19 the RAC, to identify themselves and then we will
20 think about the time frame, how much time we will
21 allow for each presentation.

22 Does anybody in the audience wish to
23 be heard?

24 MR. BIRKENHEIER: On behalf of
25 Suffolk County I would like to repeat the

1 statement made earlier, that Suffolk County feels
2 it is very important and requests that its
3 technical experts have an opportunities to meet
4 with the RAC members in order to conduct a
5 substantive discussion about the substantive and
6 technical aspects of the review of the LILCO
7 Transition Plan.

8 MR. KOWIESKI: Definitely this will be
9 taken into consideration.

10 MR. IRWIN: Let me note one thing. I
11 have seen some correspondence from Suffolk County
12 to FEMA and I believe to RAC members proffering
13 various documents which I guess are represented as
14 being of a technical nature. They appear to
15 consist largely of Suffolk County's prefilled
16 direct testimony in the licensing case that is now
17 going on before the NRC.

18 Clearly, LILCO doesn't see any value
19 in a duplicative review by the RAC of what the NRC
20 is doing. There are two different functions being
21 served that intermesh with one another to some
22 extent, but we don't think are identical nor do
23 they need to be repeated.

24 If however, the RAC desires to see
25 any further material from LILCO we will be happy

1 to provide at the RAC's request. Because all
2 parties filed testimony on every one of these
3 issues before the NRC. We are not going to refile
4 it because we believe the RAC wanted to review our
5 plan and that's what we have given you.

6 MR. KOWIESKI: Any other comments?

7 Before we adjourn, in our meeting
8 notice were mentioned the hours from 3 to 4 p.m.
9 that other parties than LILCO will be allowed, if
10 they so desire, to make a presentation or
11 statement.

12 I don't know if anybody will be
13 present between 3 and 4 o'clock but I think that
14 we ought to have a recess for 45 minutes and then
15 come back for five minutes, ten minutes and see if
16 somebody will be present.

17 Thank you.

18 (Recess at 2:20 p.m.)

19 (3 p.m.; meeting resumed.)

20 MR. KOWIESKI: Let's reconvene this
21 meeting to allow other parties than LILCO to
22 present their points of view.

23 As stated in our meeting notice, "If
24 time will allow other parties may present their
25 points of view from 3 p.m. to 4 p.m.."

1 Obviously in the interests of time if
2 someone will like to make a statement, that they
3 try to limit themselves to five minutes.
4 Therefore, I am asking if anyone would like to
5 make a statement?

6 MR. BIRKENHEIER: On behalf of
7 Suffolk County I would once again like to repeat
8 the request that Suffolk County's technical
9 experts and the RAC experts be allowed to meet to
10 discuss the serious problems that Suffolk County
11 believes there is in the LILCO plan.

12 MR. KOWIESKI: Any other comments?

13 Thank you again. This concludes the
14 meeting with LILCO and the Regional Assistance
15 Committee, as well as this satisfies our
16 requirement stipulated in meeting notice that
17 other parties will have an opportunity to present
18 their points of view.

19 MR. IRWIN: On behalf of LILCO I just
20 want to thank you and other members of RAC and RAC's
21 consultants for this opportunity to meet with you
22 all and to get the RAC's comments on the LILCO
23 Transition Plan.

24 (Hearing adjourned at 3: 05 p.m.)
25

C E R T I F I C A T I O N

I, RAYMOND DE SIMONE, a Certified Shorthand
Reporter and a Notary Public, do hereby certify
that the foregoing is a true and accurate
transcription of my stenographic notes.

Raymond De Simone

RAYMOND DE SIMONE, CSR