



# Federal Emergency Management Agency

Washington, D.C. 20472

MAR 15 1984

Mr. William J. Dircks  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Dircks:

In a June 1, 1983 memorandum, the Nuclear Regulatory Commission (NRC) invoked Section II.4 of the November 1, 1980, NRC/Federal Emergency Management Agency (FEMA) Memorandum of Understanding (MOU) by requesting FEMA to provide the NRC with findings and determinations as to whether the Long Island Lighting Company (LILCO)-County plan and/or the interim plans of the Shoreham Nuclear Power Station are adequate and capable of implementation. As a result of an Atomic Safety and Licensing Board (ASLB) order, a subsequent memorandum of June 17, 1983, requested that FEMA provide findings and determinations on the LILCO Transition Plan as a first priority. This Plan, developed and revised wholly by LILCO, proposes to use primarily LILCO personnel to carry out the offsite preparedness aspects of the plan (to include the total direction and control function) in the case of an emergency involving an accident at the Shoreham Nuclear Power Station.

On June 23, 1983, FEMA provided findings on the LILCO Transition Plan. However, primarily due to the short time frame available for evaluation of the Plan, it was necessary to obtain the support of Argonne National Laboratory to perform a technical review against the standards and evaluative criteria of NUREG-0654/FEMA-REP-1, Rev. 1. FEMA Headquarters, assisted by the FEMA Region II Regional Director and staff, directed this technical review.

When subsequent developments eventually indicated a change in the timetable for the Shoreham licensing process, NRC requested on September 15, 1983, that FEMA initiate a full and independent review by the Regional Assistance Committee (RAC) of Revision 1 of the Transition Plan. This request was later modified to include findings on Revision 3 of the Transition Plan. Those findings are presented in this letter.

The RAC reviewed the Plan against the standards and evaluative criteria of NUREG-0654/FEMA-REP-1, Rev. 1. Due to the legal authority issues which arise when some NUREG elements are applied to a utility-based plan, we have marked with an asterisk any aspect of the plan where, in our view, this legal issue occurs. The specific legal concern related to that part of the plan is identified separately in Attachment 2 of the FEMA finding. With the exception of plan aspects relating to NUREG element A.2.b. (a requirement to state, by reference to specific acts, statutes, or codes, the legal basis for the authority to carry out the responsibilities listed in A.2.a., i.e., all major response functions), the legal concern did not affect the FEMA rating given to the technical or operational items relating to NUREG elements.

8403190363 840315  
PDR ADDCK 05000322  
F PDR

IE95  
1/1

FEMA finds that Revision 3 of the LILCO Transition Plan has 32 inadequacies based on the standards and evaluative criteria of NUREG-0654/FEMA-REP-1, Rev. 1. The analysis resulting from the full RAC review and relating these inadequacies to the various NUREG-0654/FEMA-REP-1, Rev. 1, criteria is enclosed as Attachment 1.

The FEMA approach to evaluation of offsite emergency planning and preparedness under 44 CFR 350 and the MOU has been closely focused on the relationship between State and local governments and the licensee, as well as State and local plans and implementing capability. Notwithstanding the legal authority issue and the need for an adequate exercise of the offsite plan, there are many other factors which we do not evaluate in the course of our analysis that in our judgement should be considered by the Commission in a total assessment of whether successful offsite emergency operations at a given nuclear power plant are possible in an actual emergency to provide adequate assurance of public health and safety protection.

Among the additional factors to be reasonably weighed are the existence of a Federal radiological response plan and implementing capability for nuclear power plant emergencies; the known legal responsibility of State and local officials to respond to emergencies and known resources available to these entities for making an effective response; and, in the case of the Shoreham nuclear power plant, the existence of company plans and resources albeit with the deficiencies noted in the enclosed report of FEMA's Region II.

It is our belief, for example, that in the event of an accident at the Shoreham site, the Governor would request Federal assistance and the Federal Radiological Emergency Response Plan (FRERP) could well be activated. That Federal plan has been under development for several years pursuant to a requirement of Section 304 of the NRC Appropriation Authorization Act, June 30, 1980 (P.L. 96-295), and Executive Order 12241 that a Federal plan for radiological emergencies be prepared that provides assurance of public health and safety protection. The FRERP is applicable to all nuclear power plant sites as a supplement to State, local and utility resources. A full field exercise of the FRERP was conducted from March 6-8, 1984, at the St. Lucie Nuclear Power Station in Florida, to test more thoroughly and completely the capabilities required by the plan. The developing capability made available by the FRERP should be recognized when NRC considers the FEMA finding on the technical review of the LILCO Transition Plan.

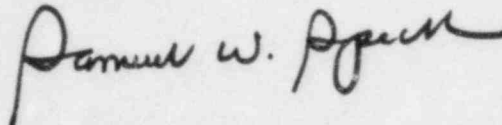
Also, consistent with directions from the President and with FEMA's legal mandates under the Federal Civil Defense Act, we are implementing a new emergency planning and assistance concept to enhance State and local capabilities to prepare for and respond to a broad range of natural and peacetime emergencies. Under title V of the Act, this applies in particular to improvements in State and local offsite readiness for commercial nuclear reactors and we are now planning to direct significant levels of new emergency management assistance resources in FY 1985 into this important area. Key programs will include

redirection of State and local emergency services personnel towards projects that support offsite nuclear facility safety, redirection of assignments to Federal radiological planning officials to concentrate on offsite safety and enhanced programs in training and education for Federal, State, local and utility employees for nuclear safety issues regarding protection of the public. FEMA is prepared to assist the utility, in conjunction with the NRC, with any technical assistance that it can offer to improve the plan which the company has prepared. Relevant FEMA training courses can be made available to utility emergency workers on a reimbursable basis.

We have tried to provide information above on additional factors which may come into play if NRC is to make a total assessment of the offsite preparedness capability at Shoreham. I would suggest that the Commission may wish to think of offsite safety as a mosaic that may very well be composed of different pieces at different times and places. Not all of the potential components will necessarily fall within the ambit of the FEMA plan and response evaluation process in all cases.

If you have any questions, please don't hesitate to call me.

Sincerely,

A handwritten signature in dark ink, appearing to read "Samuel W. Speck". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

Samuel W. Speck  
Associate Director  
State and Local Programs  
and Support

Enclosures

LILCO Transition Plan for Shoreham - Revision 3

Key to Consolidated RAC Review

Dated February 10, 1984

The Regional Assistance Committee (RAC) review of the LILCO Transition Plan for Shoreham (Attachment I) is based upon planning criteria specified in NUREG-0654, FEMA-REP-1, Rev. 1; Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November, 1980. The plan has been evaluated against each planning element specified in NUREG-0654 applicable to State and/or Local jurisdictions. These evaluations are keyed to the following rating system:

ADEQUATE RATING

---

A (Adequate)

The element is adequately addressed in the plan. Recommendations for improvement shown in **bold type** are not mandatory, but their consideration would further improve the LERO plan. These recommendations include revisions to the NUREG-0654 cross-reference, and other minor improvements.

In some cases, however, particular elements have been rated adequate provided the necessary revisions are made to maintain the adequate rating. These recommended modifications are explained for each such element in the RAC review.

---

A\* (Adequate - concerns pertaining to LERO's legal authority identified during this review)

---

The element is adequately addressed in the plan provided concerns pertaining to LERO's legal authority are resolved. The issues of legal authority affecting these elements are more fully described in Attachment 2.

Recommendations for improvement (not related to legal concerns) shown in **bold type** are not mandatory, but their consideration would further improve the LERO plan. These recommendations include revisions to the NUREG-0654 cross-reference, and other minor improvements.

In some cases, however, particular elements have been rated adequate provided the necessary revisions (not related to legal concerns) are made to maintain the adequate rating.

INADEQUATE RATING

---

I (Inadequate)

I\* (Inadequate - Concerns pertaining to LERO's legal authority identified during this review)

---

The element is inadequately addressed in the plan for the reason(s) stated in **bold type**. The plan and/or procedures must be revised before the element can be considered adequate.

The element is inadequately addressed in the plan for the reason(s) (not related to legal concerns) stated in **bold type**. The plan and/or procedures must be revised before the element can be considered adequate.

In addition, concerns pertaining to LERO's legal authority were identified by the RAC, and are more fully described in Attachment 2.

LILCO Transition Plan for Shoreham - Revision 3  
 Consolidated RAC Review  
 Dated February 10, 1984

Page 1 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

A.	<u>Assignment of Responsibility (Organization Control)</u>	
----	--	--

A.1.a	The lead role for response activities belongs to the utility, LILCO. The plan establishes the Local Emergency Response Organization (LERO) developed by the utility and comprised of federal, utility and private organizations.	I*
-------	--	----

Suffolk County is not participating in offsite emergency planning for Shoreham (see Chapter 1, Section 1.1, page 1.1-1 of the plan which references Resolution 1196-83, adopted February 17, 1983 by Suffolk County Legislature), and New York State has not implemented actions (see Chapter 1, Section 1.4, page 1.4-1. of the plan) relative to their authority.

The New York State Response, should it decide to respond, is not discussed in the 1981 plan as stated (see page 1.4-2, lines 28-29). Therefore, the plan does not address what support New York State will provide in a radiological emergency in Suffolk County when LILCO's resources are exhausted. If New York State is likely to respond, provision for interface with the LERO decision process should be included.

\*See footnote at the end of comments for element A.1.a which are continued on page 2.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 2 of 60

NUREG-0654

Element

Review Comment(s)

Rating

A.1.a  
Cont.

The plan should also address federal agencies (other than DOE, FAA and USCG) in terms of their role in response. The U.S. Department of Agriculture, FDA, EPA and NRC may be involved in an accident. The NRC will assign a liaison to the local EOC as well, and will require at least two commercial telephone lines and at least two telephone instruments.

\*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

A.1.b.

The operational role of LERO is defined in sections 1.4, 2.1 and 3.0. However, the concept of operations and relationship of each organization to the total emergency response effort is vague. Specifically, the relationship of all organizations/positions (e.g., hospitals, ambulance personnel, facilities to be used as relocation centers, outside consultants and federal agencies such as FAA, EPA and USDA) to LERO and the implied lines of responsibilities should be described in the concept of operations (sections 2 and/or 3).

I

Local Law Enforcement and Fire Departments are listed as Support Organizations with primary responsibility, yet on page 2.2-4 there is no clear statement that these organizations will participate. The role of Suffolk County, should it elect to respond, should be specifically detailed as in Procedure OPIP 3.6.3 (Traffic Control) page 8.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 3 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

A.1.c	<p>The organizational components of LERO are illustrated in Figure 2.2.1. The block diagram assumes that New York State and Suffolk County will communicate with LERO.</p> <p>Figure 2.1.2 shows the LERO Radiation Health Coordinator as having primary responsibility for accident assessment, while Figure 2.1.1, page 2 shows this position as being filled by "other personnel." The discussion on page 2.1-3 line 36 implies that this position is a LERO function. Attachment 2.2.1, page 2, lines 24-25 states that DOE will perform accident assessment. From the language on page 2.1-1, it appears that the Radiation Health Coordinator is provided by DOE/BHO, but this is not confirmed by the LERO chart (Figure 2.1.2) under Health Services Coordinator. Clarification should be provided in the plan as to the role of the "outside consultant(s)" in performing the accident assessment function.</p> <p>Figure 2.2.1 should be revised to depict missing agencies (e.g., EPA, USDA) in a clearer manner.</p>	I
-------	--	---

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 4 of 60

NUREG-0654

Element

Review Comment(s)

Rating

A.1.d

Specific individuals who shall be in charge of the emergency response are identified by title under Chapter 2, organization (pages 2.1-1 - 2.1-8). Again, LILCO personnel are the majority of LERO staff, along with DOE-RAP personnel from the Brookhaven Area Office (BHO).

A\*

The plan is adequate in addressing this element provided that the specific individual(s) who will perform the responsibilities of the Radiation Health Coordinator is identified by title and affiliation.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

A.1.e

The lead Communicator (see page 2.1-7) has responsibility for ensuring that all communicator positions in the local EOC are manned on a continuous basis once facility is activated. Also, Chapter 3, Section 3.4, pages 3.4-1 - 3.4-5 stipulates that the Radiological Emergency Communications (RECS) line between the Plant and LERO, and LILCO Notification Radio System are monitored 24 hours per day.

A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 5 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
A.2.a	<p>The functions and responsibilities for major elements and key individuals by title, of emergency response, are specified in the plan for the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement and Transportation. However, the responsibility for "Protective Response," required by NUREG-0654, has not been defined in the text, nor is it listed in Figure 2.1.2. The NUREG cross-reference should be revised to include as a citation for element A.2.a, Figure 3.5.2 which specifies "protective response" responsibilities.</p> <p>Section 2.1 does not distinguish between primary and support responsibilities for the response organizations. The distinction between primary and support responsibilities should be clearly stated in the text that describes the responsibilities for each of the various response organizations. In addition, some clarification should be made to Figure 2.1.2 to show a single primary responsibility for each function. Primary responsibilities are identified for more than one agency for the following functions in Figure 2.1.2:</p> <ul style="list-style-type: none"><li>● Public Information and Notification</li><li>● Accident Assessment</li><li>● Medical and Public Health</li><li>● Traffic Control</li></ul>	I*

\*See footnote at the end of comments for element A.2.a which are continued on page 6.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 6 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
A.2.a Cont.	<p>Lead agency responsibilities should be specified for functions where more than one agency has primary responsibility.</p> <p>Lead, primary and support responsibilities for each agency should be specified in the "position definitions" in Procedure OPIP 2.1.1. This cross-reference to Figure 2.1.2 could assist the emergency response coordinators in using the plan and procedures.</p> <p>Figure 3.3.7 assigns primary responsibility for alerting the general public to the LERO-Director of Response. The LERO-Coordinator of Public Information is responsible for providing public information. These same LERO support functions (i.e., Alert General Public and Inform Public with EBS Broadcasts) refer to FEMA. This must be clarified, since FEMA has no responsibility for notifying the public during a radiological emergency.</p> <p>*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</p>	

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 7 of 60

NUREG-0654

Element

Review Comment(s)

Rating

A.2.b      Attachment 1.4.1 refers to legal authority under  
10 CFR 50.47 (c)(1) which provides as follows:

I\*

Failure to meet the standards set forth in paragraph (b) of this subsection\*\* may result in the Commission declining to issue an Operating License; however, the applicant will have an opportunity to demonstrate to the satisfaction of the Commission that deficiencies in the plans are not significant for the plant in question, that adequate interim compensating actions have been or will be taken promptly, or that there are other compelling reasons to permit plant operation.

The cited authorities (Section 1.4 of the LILCO Transition Plan relate to the authorities of the NRC to license a plant under various degrees of emergency preparedness and compensation, rather than the police-type actions.

The utility has developed LERO, comprised of utility, Federal, and private individuals. If New York State and Suffolk County implement an emergency plan, LERO would follow their lead (see Section 1.4, pages 1.4-1 - 1.4-2; also, Attachments 1.4.1 and 1.4.2).

\* This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

\*\* Standards A-P specified in criteria defined in NUREG-0654; FEMA-REP-1 Rev. 1. "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants - For Interim Use and Comment" January 1980.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 8 of 60

NUREG-0654

Element

Review Comment(s)

Rating

A.3      Appendix B contains letters of agreement for the following support organizations identified in section 2.2 of the plan.

I\*

Signed      Dated

● DOE/Brookhaven National Lab	Yes	Yes
● WBLI radio	Yes	Yes
● WCTO radio	Yes	Yes
● WGSM radio	Yes	Yes
● U.S. Coast Guard	Yes	Yes
● New York Telephone	Yes	Yes
● Marketing Evaluations, Inc.	Yes	Yes
● WALK radio	No	Yes
● American Red Cross	No	No

The plan states that: "It is anticipated that all local law enforcement agencies and fire departments within the ten mile EPZ will continue to carry out their normal response functions during an emergency. Should the incident escalate to the point of requiring these agencies to evacuate from the local area, it is further anticipated that these agencies will take their own compensating measures, based upon the situation at hand, and continue to render the necessary services in response to the situation." The plan also states that: "It is anticipated that snow removal operations within the ten mile EPZ will be provided by local organizations in their normal fashion during an emergency." However, no letters with Suffolk County or local agencies responsible for law enforcement, fire response or snow removal could be located in the plan. No reference to public laws requiring local agencies and services to respond could be found using the NUREG cross-reference. The "Local Public Service Agencies" and "Local Emergency Medical Services Agencies" listed in Figure 2.1.2 should be specified.

\*See footnote at the end of comments for element A.3 which are continued through page 10.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 9 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

A.3  
Cont.

Letters of intent from bus and ambulance suppliers are included in Appendix B for the following resources:

- Bus companies - (1559/? vehicles#)
- Ambulance companies - (224/? vehicles ##)

However, these letters of intent do not commit the bus and ambulance companies to supply equipment to LERO in the event of a radiological emergency at the Shoreham site, because contracts have not as yet been finalized with the bus or ambulance suppliers. The contract revisions requested by several of the ambulance companies could limit the number of ambulances and ambuletts that will be available.

The LERO Transportation Support Coordinator is responsible for driver support. The LILCO plan states that the utility will provide trained licensed LILCO employees as a major source of bus drivers (Appendix A, III-36). The plan should specify the number of drivers that have been trained and licensed to respond to a radiological emergency at SNPS.

The letter of agreement from DOE on page APP-B-1 does not specify the degree of response to be provided. Shoreham's requirement is closer to that of a "compensating measure" rather than radiological assistance, as is stated in the letter. DOE's role, in this case, is that of the offsite response agency, providing independent dose assessment capabilities. This is not clearly stated in the generic letter from DOE which limits DOE's role to "... advice and emergency action essential for the control of the immediate hazards to health and safety."

# Includes buses, vans, coaches, flexetts, etc.

## Includes ambulances, ambuletts, etc.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 10 of 60

NUREG-0654

Element

Review Comment(s)

Rating

A.3  
Cont.

Letters of agreement could not be located for the following support organizations/persons or Representative Outside Agencies (see Procedure OPIP 2.1.1, page 12) identified in the plan.

- Stony Brook Hospital
- Central Suffolk Hospital
- SUNY Stony Brook
- BOCES Central Islip
- SCCC Selden
- Local law enforcement agencies
- Local fire departments
- Local snow removal organizations
- Federal Aviation Administration
- Laboratories which provide environmental sample analysis
- Radiological Health Coordinator (outside consultant)
- Relocation center coordinator
- Nursing support
- Counselling coordinator

Letters of agreement with support organizations which provide laboratory and environmental sample analysis could not be located in the plan.

The resources LERO expects to use to support the federal responses which are identified in Attachment 3.11.1 should be supported by letters of agreement from those organizations.###

\*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

###Letter of intent with Coram Bus Service is included in Appendix B, pages APP-B-30 and 30A.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 11 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
A.4	<p>The LERO Director of Local Response is responsible for ensuring the continuity of emergency resources for 24-hour operations over a protracted period.</p> <p>The establishment and maintenance of LERO over a protracted period is described in Section 2.1, page 2.1-1, line 26-29; page 2.1.2, lines 36-39 and Procedure OPIP 2.1.1.</p> <p>The NUREG-0654 cross-reference should be revised to include Procedure OPIP 2.1.1 as a citation for element A.4.</p>	A
C.	<p><u>Emergency Response Support and Resources</u></p>	
C.1.a	<p>According to the plan, the LERO Director of Local Response requests the Governor to ask the President to declare an emergency or disaster. Section 3.11, page 3.11-1 of the plan provides that if this request is granted, federal assistance would be administered by the Federal Radiological Preparedness Coordination Committee (FRPCC).</p> <p>The above statement in Section 3.11, page 3.11-1 of the plan referring to the Federal Radiological Preparedness Coordination Committee is incorrect, and should be deleted. The plan should state that the federal response to a radiological emergency would be coordinated by the Federal Emergency Management Agency in accordance with the Federal Radiological Emergency Response Plan.</p> <p>The NUREG-0654 cross-reference should be revised to include Attachment 2.2.1 (page 2 of 17, line 27) which states that "BHO is notified by LILCO customer services."</p> <p>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</p>	A*

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 12 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
C.1.b	<p>The DOE-RAP is specified to provide radiological monitoring assistance and expected times for arrival are provided. The plan is adequate in addressing this element provided that specific resources and expected times of arrival are identified for the U.S. Coast Guard (see section 2.2, page 2.2-2). Any additional federal resources, including expected times of arrival to be furnished through the F, (see Section 3.11, page 3.11-1. other arrangements, should also be specified (e.g., EPA, NRC, USDA).</p>	A
C.1.c	<p>The LILCO transition plan identifies resources that are available to support the federal response.</p> <p>LERO has not specified what resources have been identified by federal agencies to support their effort (e.g., air fields, command posts, telephone lines, radio frequencies and telecommunications centers). For example, the EPA response teams will also require:</p> <ul style="list-style-type: none"><li>● airfield for landing military aircraft (C-130)</li><li>● four independent stationary electrical outlets (110/120 volts @ 30 amperes AC)</li><li>● source of liquid nitrogen</li><li>● office, lab and storage space.</li></ul>	I

LILCO Transition Plan for Shoreham - Revision 3

Consolidated RAC Review

Dated February 10, 1984

Page 13 of 60

NUREG-0654

Element

Review Comment(s)

Rating

- |       |  |    |
|-------|--|----|
| C.2.a | LERO representatives are already at the SNPS site and may be dispatched to the near-site Emergency Operations Facility (EOF).  | A  |
| C.3   | Page 3.5-2 of the plan identifies two ORS teams from DOE-RAP for monitoring services and several other organizations for analyses.   | A  |
| C.4   | Written letters of agreement are incomplete. Letters of Agreement were not found in Appendix B for all organizations listed in Sections 2.2, 3.5 and Attachment 3.11.1 of the plan (also see analysis comments for element A.3). | I* |

\*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 14 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
D.	<u>Emergency Classification System</u>	
D.3	The Emergency Classification System, described in Chapter 3, Section 3.2, page 3.2-1 conforms with the system set forth in Appendix 1 of NUREG-0654; FEMA-REP-1, Rev. 1.	A
D.4	The emergency action procedures to be taken are adequately described in Chapter 3, Concept of Operations and the Implementing Procedures OPIP 1.1.1 through 5.4.1.	A
E.	<u>Notification Methods and Procedures</u>	
E.1	<p>The notification and mobilization of emergency response organizations including the verification of messages is outlined in Section 3.3, page 3.3-1 and Procedures OPIP 3.3.2, 3.3.3 and 3.3.4. The LILCO Customer Services Office in the Hicksville Operations Center is the primary LERO notification point.</p> <p>Figures 3.3.2 through 3.3.4 do not include a list of persons/groups/organizations to be notified for mobilization at general emergency. These notification procedures are the same as for Site Area Emergency. The plan is adequate in addressing this element provided that the notification list of persons/groups/organizations to be notified at general emergency is added to the plan.</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 15 of 60

NUREG-0654

Element

Review Comment(s)

Rating

E.2

The necessary procedures for alerting, notifying, and mobilizing emergency response personnel are found in procedure OPIP 3.3.2.

A

Section 3.4, page 3.4-5 which describes the LILCO paging system, and Figure 3.4.1 should be added to the NUREG-0654 cross-reference.

E.5

The plan establishes a system for disseminating appropriate information contained in initial and follow-up messages received from the licensee, including the appropriate notification to the broadcast media.

A\*

The notification system described throughout the plan is termed the Emergency Broadcast System (EBS). However, this system, which is a network of Long Island radio stations, with WALK as the entry station, is not the official Emergency Broadcast System (EBS) for Long Island. The official Emergency Broadcast System, is authorized by the Federal Communications Commission, for use by government officials to provide information to the general public. For clarity, the system developed by LERO should use different nomenclature to distinguish it from the FCC sanctioned EBS system. The plan is adequate in addressing this element provided that this issue is clarified in the plan.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 16 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
E.6	<p>The prompt notification system consists of 89 fixed sirens, tone activated radios provided to special facilities, (i.e., schools, hospitals, medical support hospitals, handicapped facilities ambulance companies, nursing homes, and major employers, etc.), EBS, and a mobile public address system. Marketing Evaluations Incorporated will verify that each siren has activated (see page APP-B-53). The plan adequately covers the need to demonstrate, under NUREG criteria, that there are means to notify the public.</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p>	A*
E.7	<p>The draft messages intended for the public found in Procedure OPIP 3.8.2 satisfy NUREG-0654 requirements.</p> <p>Procedure OPIP 3.8.2 includes the following draft messages:</p> <ul style="list-style-type: none"><li>● EBS Activation Advisory</li><li>● Alert (release of radiation)</li><li>● De-escalation of Emergency</li><li>● Termination of Emergency</li><li>● Test Message for EBS</li><li>● Spurious Activation Message of Prompt Notification Sirens</li><li>● Description of Emergency Planning Zones for Suffolk County (to be included in EBS messages).</li></ul>	A

LILCO Transition Plan for Shoreham - Revision 3

Consolidated RAC Review

Dated February 10, 1984

Page 17 of 60

NUREG-0654

Element

Review Comment(s)

Rating

E.7      The plan details how press conferences  
Cont.      will be conducted. Based on FEMA's  
            exercise experience, it is helpful to  
            have emergency information bulletins  
            available for use by decision-  
            makers, the press, rumor control, and  
            other PIOs.

Radio emergency information bulletins  
contained in the plan include dosage  
information. Such information should  
be presented in less technical language  
in order to maximize the general public's  
understanding of this information.

In addition, sample messages should  
include, as appropriate, information  
for farmers, food distributors, food  
processing facilities, etc.

F.      Emergency Communications

F.1.a      Provision for 24-hour activation of the LERO      A  
            emergency response network is accomplished  
            via the RECS line in the LILCO Customer  
            Service Office in the Hicksville Operations  
            Center (see Section 2.1, page 2.1-7 and  
            Section 3.4, pages 3.4-1 to 3.4-5). This  
            RECS line is monitored on a 24-hour basis  
            and the LERO officer at the Customer  
            Service Office is responsible for  
            activating the paging system which notifies  
            key emergency response personnel that an  
            actual incident has occurred.

The LILCO Notification Radio System  
serves as the backup communication system  
to the RECS for communications between  
the Shoreham Control Room and the LILCO  
Customer Service Office.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 18 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
F.1.b	<p>Section 3.4 E (page 3.4-4) provides for communications from LERO to Suffolk County, Nassau County, New York State, and Connecticut via commercial telephone and centrex.</p> <p>The plan should provide for communication with the State of Rhode Island which is affected by the 50-mile EPZ. The plan is adequate in addressing this element provided that arrangements are established for communications with Rhode Island.</p> <p>The NUREG cross-reference should be revised to include section 3.4 page 3.4-4 as a citation for element F.1.b.</p>	A
F.1.c	<p>The plan provides for notification of the following federal emergency response organizations:</p> <ul style="list-style-type: none"><li>● FEMA</li><li>● DOE response team</li><li>● U.S. Coast Guard (USCG)</li><li>● Federal Aviation Administration (FAA)</li></ul> <p>However, the plan does not provide for direct notification by LERO of other federal emergency response organizations in the event that direct support is to be requested from those organizations. In addition to DOE, USCG, and FAA, communications with other Federal support agencies should be arranged, i.e., NRC, FDA, EPA, etc.</p>	I
F.1.d	<p>Communication between the local EOC in Brentwood, New York and the licensees EOF (or TSC) is maintained via the following means (see Figure 3.4.1):</p> <ul style="list-style-type: none"><li>● RECS line</li><li>● commercial telephone</li><li>● radio</li></ul>	A

LILCO Transition Plan for Shoreham - Revision 3

Consolidated RAC Review

Dated February 10, 1984

Page 19 of 60

NUREG-0654

Element

Review Comment(s)

Rating

F.1.d  
Cont.

The RECS line will allow 24-hour per day notification between the plant and LERO. Communication with the radiological field monitoring teams is maintained via radio link.

F.1.e

The provisions for alerting and activating emergency response personnel in each response organization as described in Section 3.3, pages 3.3-1-4; Figures 3.3.2, 3.3.3 and 3.3.4 and Procedure OPIP 3.3.2 are adequate.

A

A list of persons/groups/organizations to be notified for mobilization at general emergency should also be included in the plan (see also comment for element E.1). The plan is adequate in addressing this element provided that the notification list for persons/groups/organizations to be mobilized at general emergency is added to the plan.

F.2

Communications with fixed and mobile medical support facilities are specified in the plan as follows:

A

Means

- Ambulance dispatch stations

commercial  
telephone and  
radio

- Ambulance drivers

radio link  
via dispatch  
station

- Hospitals

commercial  
telephone and  
radio links  
via ambulance  
dispatch sta-  
tions and mobile  
ambulance units.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 20 of 60

NUREG-0654

Element

Review Comment(s)

Rating

F.3

Communication drills will be conducted by LILCO (see Section 5.2, Part A, page 5.2-2a). Communications will be tested monthly; while communications between the plant, the local EOC, and field monitoring teams will be tested annually. Also, see page 3.4-7.

A\*

According to the cross-reference submitted with the plan, the frequency of siren tests as suggested in Appendix 3 of NUREG-0654; FEMA-REP-1, Rev. 1 is specified in the LILCO Nuclear Operations Support Department Procedures. Those procedures should be submitted to FEMA for review in order to assure that the required siren tests will be performed in accordance with NUREG-0654, Appendix 3, page 3-12, Section h (2), Siren Testing Guidance, Oversight.

This element is adequate provided that the LILCO Nuclear Operations Support Department Procedures contain the required frequency of siren tests.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 21 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

G. Public Education and Information

G.1.a-d Section 3.8, pages 3.8-1-3 of the plan provides for the dissemination of brochures to the public which include the information required by NUREG-0654. The information to be provided will include:

A

- educational information on radiation
- contact for additional information
- protective measures
- survey card on special needs of the handicapped.

Educational brochures will be mailed to all households and commercial establishments. LILCO plans to use their billing lists for the mailing. In addition, inserts will be developed for the Suffolk telephone directory which will include the following:

- Map of 10 mile EPZ/emergency planning zone.
- List of EBS stations.
- Siren system description/purpose.
- Protective actions the public may be advised to take (sheltering, evacuation).
- Relocation center locations.
- Items to take along for an evacuation.

Local telephone directories will also contain the above items. In addition, these local directories will contain maps showing evacuation routes.

Brochures will be updated on an annual basis, and an annual orientation of news media will be reinforced during annual exercises.

The public education brochure refers to the Emergency Broadcast System (EBS). This nomenclature should be changed to differentiate the LERO system from the FCC sanctioned EBS system (see comment for element E.5).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 22 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

G.2      The public information program and provisions for its dissemination as described in Section 3.8 of the plan are adequate.

A

G.3.a      The emergency news center (ENC) is to be established in the Quality Inn, Old Mill in Ronkonkoma, New York. This facility will be set up as the central clearing house for the release of information received from the utility and LERO representatives (see Section 3.8, page 3.8-4). The plan provides that "private and public agency/or organization representatives (i.e., American Red Cross, Suffolk County, FEMA, NRC, State officials, etc.) will be invited to participate as a panel in all news conferences."

A\*

The NUREG-0654 cross-reference should be revised to include page 3.8-1 as a citation for element G.3.a.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

G.4.a      The LERO Coordinator of Public Information (CPI) and LILCO's Emergency News Manager at the ENC is the designated spokesperson(s) for LERO.

A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 23 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

G.4.b LERO Public Information Personnel at the ENC are charged with the responsibility "to provide accurate information (to the media) on a timely basis." A

G.4.c The ENC is designated as the central location for rumor control. The rumor control point is for the use of utility personnel at the LILCO Customer Relations District Offices and the LILCO Customer Call Boards, in answering questions asked by the public. The rumor control point will be staffed by representatives from LERO and the utility. A

The plan does not provide information about rumor control staffing, the number of rumor control telephone lines that will be available and staffed, and how current information will be provided to the rumor control staff. It is recommended that the rumor control staff be provided with press releases and radio emergency information bulletins to assure that they are apprised of the current emergency status.

G.5 LERO will coordinate an annual orientation program for the news media. This program will familiarize the media with the following: A

- Utility emergency plans,
- Radiation information,
- Points of contact for release of public information in the event of an emergency, and
- The location and operation of the ENC.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 24 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
H.	<u>Emergency Facilities and Equipment</u>	
H.3	The local EOC to be operated and staffed by LERO personnel is located at the LILCO Operations Facility in Brentwood, Long Island, New York.	A
H.4	<p>The activation and staffing of the local EOC by LERO personnel is specified in Section 3.3, page 3.3-1; Section 4.1 page 4.1-1 and Procedure OPIP 4.1.1 of the plan.</p> <p>The plan is adequate in addressing this element, provided that the modifications and clarifications outlined below are incorporated in the plan.</p> <p>The Radiation Health Coordinator should be included on the emergency call checklists in Procedure OPIP 3.3.2.</p> <p>Per analysis comment E.1 and F.1.e, Figure 3.3.4 does not include a list of persons/groups/organizations to be notified for mobilization at general emergency.</p> <p>The plan and Procedure OPIP 4.1.1 appear to be contradictory. It is not necessary to delay notifications to the EOF and New York State until full activation of the local EOC is completed (as stated in Section 4.1.A of the plan). Procedure OPIP 4.1.1, Section 5.2 indicates that the Director of Local Response will make these notifications upon arrival at the local EOC, Section 4.1.A of the plan should be changed to agree with the implementing procedure.</p> <p>The NUREG-0654 cross-reference should be revised to include Procedure OPIP 4.1.1 as a citation for element H.4.</p>	A*

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 25 of 60

NUREG-0654

Element

Review Comment(s)

Rating

H.7

The two (2) Offsite Radiological Survey (ORS) teams, each consisting of two (2) individuals per team from DOE-RAP are provided in the plan. These teams will obtain their ORS kits at Brookhaven National Laboratory (BNL).

A

Equipment is shown for the two ORS teams on page 4.4-1, while the plan states on page 3.5-2, line 22 that additional teams from LILCO will be available, if needed.

It is unclear whether the LILCO ORS support teams will be using radiological survey kits from DOE, or whether this equipment is LILCO's property. If these kits belong to LILCO, the plan is adequate. If, however, these kits are not LILCO property (i.e., BNL/DOE property), the plan should specify: (1) where the ORS kits for the LILCO support teams are to be maintained, (2) how LILCO personnel are to be deployed, and (3) how LILCO instrumentation compares to DOE's. The plan is adequate in addressing this element provided that clarification of ownership and responsibility for maintenance of the ORS kits are specified.

The equipment lists on page 4.4-1 and Attachment 2.2.1 are different. The plan should specify who is responsible for supplying the equipment on page 4.4-1.

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.5.1 (see Section 5.2.1) as a citation for element H.7.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 26 of 60

NUREG-0654

Element

Review Comment(s)

Rating

H.10

Section 5.3 of the plan provides that LILCO will inspect, inventory and operationally check emergency response equipment at least once each calendar quarter. Calibration of instruments will be done at intervals recommended by manufacturers. The plan also makes provision for reserve equipment.

A

Survey meters compatible with the GM1 probes should be included on the equipment list.

The availability of backup equipment for the additional field monitoring teams from LILCO should also be specified in the plan.

H.11

A detailed list of equipment to be used in the emergency response by LERO is located in the portions of the plan listed in the NUREG cross-reference.

A

The plan is adequate provided that the modifications outlined below are incorporated in the plan.

The equipment list on page 4.4-1 includes only one air sampler. The plan should state whether back-up samplers are available at the staging area. It should be taken into consideration that radioiodine sampling capability is lost in the event of pump failure. How does the list on page 4.4-1 relate to the list in Procedure OPIP 5.3.1, which includes multiple air samplers? Also, are there radiation meters to go with the GM detectors listed in Procedure OPIP 5.3.1 as available at the local EOC?

Communications equipment on page 4.1-4 should include radio links between the field teams and EOC.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 27 of 60

NUREG-0654

Element

Review Comment(s)

Rating

H.11  
Cont.

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.5.1 as a citation for element H.11.

H.12

Page 3.5-2 of the plan states that field data will be radioed back to the Environmental Survey Function and all samples will be returned to the local EOC, or as directed, for laboratory analysis by DOE-RAP or SNPS labs.

A

I.

Accident Assessment

I.7

The capability and resources for field monitoring within the plume exposure EPZ are to be provided through the DOE-RAP resources at the Brookhaven Area Office. The capabilities, mobilization, response time, and equipment for these resources are provided in the FRMAP plan for the support of local emergency response plans.

A

Procedure OPIP 3.5.1 and the equipment list in Attachment 2.2.1 of the plan do not coincide. The plan is adequate in addressing this element provided that these two lists are reconciled. Procedure OPIP 3.5.1, page 7 should describe what provisions are available to return sample media for laboratory verification on an expedited basis, particularly, samples which yield positive results in the field.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 28 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

I.8	The capabilities, equipment and expertise for accident and dose capabilities are found in Procedure OPIP 3.5.2. Field team composition, communication, monitoring equipment and estimated deployment times are found in Section 3.5 and Procedure OPIP 3.5.1. Page 3.5-2 of the plan gives field team composition.	I
-----	--	---

Pages 3.1-2 and 4.1-2 of the plan specify that the LERO Director of Local Response, with the Radiation Health Coordinator, is responsible for formulating the protective action decisions. The plan does not specify whether LERO has accident assessment personnel who can weigh the plant's status from an operational view in developing protective action recommendations. The choice of protective actions is apparently keyed almost entirely to radiation dose or projected dose. Consideration should be given to the plant's status including; prognosis for stabilizing, improving or worsening situations, or timing of releases so that preventive evacuation prior to a release is not overlooked when such releases may be imminent. The plan does not specify how protective action decisions would be made in the absence of an actual release. The plan should specify that protective actions such as sheltering, and especially evacuation, could be implemented prior to initiation of significant releases, if possible.

The NUREG-0654 cross-reference should be revised to include the following citations for element I.8:

- Section 2.1, Figure 2.1.1, page 2 of 4
- Section 2.2, Attachment 2.2.1
- Section 4.4, page 4.4-3 (means of transportation for field teams).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 29 of 60

NUREG-0654

Element

Review Comment(s)

Rating

I.9

Section 2.2, Attachment 2.2.1 states that the DOE Brookhaven Area Office can provide support to LILCO for airborne radioiodine sampling and analysis to concentrations as low as  $5 \times 10^{-8}$ . While the equipment listed is potentially capable of making the required measurements, the methodology shown in Procedure OPIP 3.5.1 (see Section 5.3.7b) would not give accurate results for most accident conditions. Even without core damage, radioiodine may be collected on the particulate filter if the iodine is in elemental form. Therefore, one cannot rule out activity on the particulate filter as not being iodine. Also, the nomogram which relates iodine to total fission products for the calculation of thyroid dose (OPIP 3.5.2, Att. 11) may not be realistic in this aspect. Furthermore, the amount of fission products collected from a core damage accident are highly dependent on a number of parameters, such as moisture in containment, filtration of release, distance from the site, etc., and are not easily amenable to the nomogram assumptions.

The heading of attachments 5 and 6 Procedure OPIP 3.5.2 should be changed to read "Multiply results by  $10^{-6}$ ."

I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 30 of 60

NUREG-0654

Element

Review Comment(s)

Rating

I.10

The procedures for estimating integrated dose from the projected and actual dose rates (plume exposure) were found in Procedure OPIP 3.5.2. Ingestion pathway dose estimations were found in Procedure OPIP 3.5.3. Procedure OPIP 3.6.1 contains protective action recommendations.

I

Procedure OPIP 3.5.2 is lacking several nomograms which are required for the calculations.

The plan should include provisions for the consideration of plant parameters regarding types of releases. Reliance on the stated 0.05 m/sec. deposition velocity is applicable under a limited set of atmospheric conditions, and should not be relied upon as LERO's only means of ingestion pathway zone protective action decisions. Field surveys with HP210 detectors can quickly determine ground deposition.

The NUREG-0654 cross-reference should be revised to also include Procedure OPIP 3.6.1 as a citation for element I.10.

I.11

Capabilities to locate and track the plume (field monitoring) are to be provided through the DOE-RAP resources at the Brookhaven Area Office. The capabilities, mobilization, response time, and equipment for these resources are provided in the FRMAP plan for the support of local emergency response plans (see Attachment 2.2.1 of the plan).

A

Procedure OPIP 3.5.1 Section 5.3 should be included in the NUREG-0654 cross-reference submitted with the plan since it discusses the plume tracking method to be used by the ORS teams.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 31 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.	<u>Protective Response</u>	
J.2	The provisions for evacuation of SNPS non-essential site personnel in Section 3.6 (page 3.6-8) describe only the route to be taken if a public evacuation is in progress (i.e., high traffic density). There is no discussion of alternative routes that are to be used for inclement weather and specific radiological conditions. The plan should include a discussion of transportation to be used by SNPS site personnel.	I
J.9.	EPA's plume exposure and FDA's ingestion pathway PAG's are listed in Section 3.6.  There is no discussion of how protective actions would be implemented based on plant conditions prior to actual releases (see comment for element I.8). Also, Tables 3.6.2 and 3.6.3 are taken from the FDA draft report, and are not the final values.  The NUREG-0654 cross-reference should be revised to include Table 3.6.1 as a citation for element J.9.	I
J.10.a	The Evacuation Plan (Appendix A Section I - Preface pages I-1 to I-2 ) is made up of two plans -- a study performed by Suffolk County as part of an agreement with LILCO (9/21/81), and a study performed by KLD Associates under an agreement with LILCO to develop an evacuation plan (12/30/81), LILCO has integrated the two studies into Appendix A.	A*

\*See footnote at the end of comments for element J.10.a which are continued on page 32.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 32 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

J.10.a Cont.	The maps showing evacuation routes, evacuation areas, preselected offsite radiological monitoring locations (including Table 3.5.1 and Procedure OPIP 3.5.1 listing designators for these locations) and shelter areas are included in the plan.
-----------------	--

Although the relocation centers are indicated on Figure 9, Zone A, they are not specifically identified as relocation centers. The legend should be revised to include symbols designating relocation centers on this map, since it is indexed on the NUREG cross-reference.

The NUREG-0654 cross-reference should be revised to include Attachment 11 of Procedure OPIP 3.5.1 as a citation for element J.10.a.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

J.10.b	The map in Figure 3 of Appendix A does not show subarea boundaries for evacuation areas F (F1-F5) or K (K1-K5). If it is planned that evacuation can be effected by subarea, then these subareas should be delineated in accord with the seasonal population data for 1980 and 1985 in Table III of Appendix A.	I
--------	---	---

Table III, Page III-2 of Appendix A, reflects population distribution by ERPA. Population numbers should be stated for each ERPA. A map(s) showing population distribution has not been included in the plan.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 33 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.10.c	<p>The means for notifying the transient and resident population consists of fixed sirens (89 units) and EBS.</p> <p>The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.3.4, Section 5.4 (notification of the deaf) as a citation for element J.10.c.</p> <p><u>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</u></p>	A*
J.10.d	<p>The procedures and inventory of requirements for protecting institutionalized mobility-impaired persons has been completed. However, the procedures and resources to deal with non-institutionalized mobility impaired persons still require completion (i.e., the directory of non-institutionalized mobility-impaired persons needs to be completed).</p> <p>The directory to be compiled for noninstitutional mobility impaired individuals should include the number of such persons at a given address and a designator indicating each person's impairment (e.g., ambulatory, non-ambulatory, sight impaired, hearing impaired, wheel chair, etc.). This information is needed to insure that the means of notification is appropriate and to facilitate the coordination of equipment to be used in relocating these persons, if necessary. It is understood that this directory is being updated based on completed survey cards on special needs of the handicapped that are being returned to LILCO. The plan is adequate in addressing this element provided that the directory of noninstitutionalized mobility impaired individuals has been completed.</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 34 of 60

NUREG-0654

Element

Review Comment(s)

Rating

J.10.e

The provisions for use of KI for emergency workers are discussed. However, there is concern with the method by which KI will be distributed. Procedure OPIP 3.6.2 states that distribution will be accomplished by directing emergency workers to a distribution location. This may require recalling emergency workers from the field and a time delay in administering KI to them. The offsite field monitoring teams have KI in their kits. Another concern relates to expiration dates on the KI. Procedure OPIP 3.6.2 states that no KI should be issued if it is beyond its indicated shelf life. At the present time, there is no KI available which is not beyond the labeled expiration date, however, FDA has granted extensions for its use. The procedures should reflect FDA extensions.

I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 35 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.10.f	<p>Page 3.6-3, lines 22-24 of the plan state that the PAG for use of KI as a thyroid blocking agent is a projected dose of 10 rem to an emergency worker's thyroid. No provision is made for the general population which is consistent with New York State policy (see letter from J.L. Smith to Harold R. Denton, N.R.C. S.N.R.C-539 Attachment 1, page 4-J-10c clarification). The 10 rem PAG is considerably lower than the FDA Final Recommendation of 25 rem or greater projected thyroid dose. It would appear that LILCO has taken the more conservative lower limit of NCRP Report No. 55 (10-30 rem) or the original FDA draft recommendation (10-20 rem). The EPA PAG for emergency workers is 25 rem thyroid (see Chapter 3, Section 3.6, C., page 3.6-5, lines 6-7).</p> <p>The plan states that only those emergency workers who have been previously screened for its use will be given KI (see page 3.6-5, lines 5-8). A discussion of how this screening will be accomplished could not be located in the plan. The plan is adequate in addressing this element provided that the procedures for screening emergency workers who would be given KI are included in the plan.</p>	A*
<hr/> <p>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</p>		

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 36 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.10.g	<p>The plan does reflect resources for school or general evacuation including the number of buses to be used.</p> <p>The letters of intent arranging for bus resources have been included in the plan. However, these letters of intent indicate that contracts establishing the terms under which bus companies will provide their equipment in the event of a radiological emergency at SNPS have not been finalized. Therefore, the actual commitment of these resources is uncertain.</p> <p>The notification call up list for transportation personnel has not been completed (Procedure OPIP 3.3.2 - 163 pages).</p> <p>The plan is adequate in addressing this element provided that contracts are successfully negotiated with the bus companies providing their vehicles, and the notification call up list for transportation personnel has been completed.</p> <p>The NUREG-0654 cross-reference should also be revised to include Procedures OPIP 3.6.4 and 3.6.5 as citations for element J.10.g.</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 37 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

J.10.h	<p>Suffolk County Community College, BOCES in Islip, and SUNY in Stony Brook are the primary relocation centers. Two back-up centers (SUNY - Farmingdale, St. Joseph's College - Patchogue) have been identified. All of these centers would be set up and run by the American Red Cross.</p>	I
--------	---	---

There is no legend on Figure 9, Zone A (page IV-76, Appendix A) defining the designators for SUNY, SCCC and BOCES as relocation centers. However, it has been estimated that only the BOCES relocation center is at least five miles beyond the 10-mile EPZ. The following table of estimated distances of relocation centers beyond the boundaries of the plume exposure EPZ has been derived from the map and scale on Figure 9 of Appendix A.

	<u>&gt; 5 mi beyond 10 mile EPZ</u>	<u>&gt; 10 mi beyond 10 mile EPZ</u>
● SUNY in Stony Brook	Not able to be determined	No
● Suffolk Community College	No	No
● BOCES	yes	Not able to be determined

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.7.1 as a citation for element J.10.h.

J.10.i	<p>The projected traffic capacities of evacuation routes under emergency conditions are shown in Appendix A, Section III, Table IV, pages III-17-33. The necessary studies have been completed, and adequately satisfy NUREG-0654 requirements.</p>	A
--------	---	---

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 38 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.10.j	The plan and procedures call for contacting the Coast Guard and FAA and requesting cooperation of these agencies for assistance (i.e., clearance of boats from Long Island Sound, clearance of aircraft, etc.). The LERO Traffic Control Coordinator is responsible for coordinating the road logistic aspects for an evacuation and coordinating the maintenance of traffic control points for an evacuation. The locations of approximately 147 traffic control posts are specified in Appendix A, Section IV, Figure 8, pages IV-52-81.	A*

Provisions for access control, to limit access to evacuated areas, is contained in Appendix A, Section IV, Evacuation Procedures.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 39 of 60

NUREG-0654

Element

Review Comment(s)

Rating

J.10.k

The means for dealing with potential impediments to evacuation are addressed in Section 3.6, page 3.6-6 of the plan and Appendix A, page IV-5. Provisions for the removal of cars by tow trucks is adequate.

I\*

According to page 2.2-4 of the plan, it is anticipated that snow removal will be provided by local organizations in their normal fashion during an emergency. During severe snow or an ice storm, the plan recommends selective or general sheltering until the hazard is mitigated. It is suggested that pre-emergency planning for snow removal on the evacuation routes be further developed to include administrative procedures, SOPs, etc. These procedures are recommended to insure that the snow removal strategy would coincide with any evacuation scheme that might be chosen.

The NUREG cross-reference should list Procedure OPIP 3.6.3 as a citation for element J.10.k.

\*This element is inadequately addressed in the plan. In addition, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 40 of 60

NUREG-0654

Element

Review Comment(s)

Rating

J.10.1

The presentation of time estimates for evacuation of various sectors in Appendix A, Table XV, page V-8 conforms with the preferred format for presenting the data and results for the following types of evacuation:

A

	<u>Conditions</u>	
	<u>Normal</u>	<u>Adverse</u>
Permanent population	x	x
Transient population	x	x
General population	x	x
Special population	x	x

The table as presented is adequate.

As recommended in Appendix 4 of NUREG-0654, the time for confirmation of evacuation should be estimated and included in Table XV of Appendix A.

J.10.m

According to page 3.1-2 and page 4.1-2, the LERO Director of Local Response, in conjunction with the Radiation Health Coordinator, formulate the protective action decisions. The plan does not specify whether LERO has accident assessment personnel who can weigh the plant's status from an operational view in developing protective action recommendations (see comment I.8). Nor are the off-site conditions (non-radiological) specifically addressed, in that the Evacuation Coordinator, who should have information regarding any off-site constraints to protective actions, is not involved in the decisions.

I

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.6.1 as a citation for element J.10.m.

LILCO Transition Plan for Shoreham - Revision 3

Consolidated RAC Review

Dated February 10, 1984

Page 41 of 60

NUREG-0654

Element

Review Comment(s)

Rating

J.11

Section 3.6, page 3.6-8 of the plan states that control of the ingestion exposure pathway EPZ will be directed by the LERO Health Services Coordinator.

I

Procedure OPIP 3.6.6 contains ingestion pathway procedures, PAGs, and agricultural resource information such as listings of dairy farms, processing plants, duck growers, hog farms, vegetable and fruit growers, potato processing plants in New York and processing plants, dairy farms in Connecticut. The inclusion of Rhode Island within the 50-mile EPZ should be reevaluated, since Rhode Island was included in a previous revision (see comment for criteria element F.1.b).

The plan is not specific for imposing protective procedures such as impoundment decontamination, processing, decay, product diversion, and preservation. There are no maps referenced for recording survey and monitoring data, key land use data, dairies, food processing plants, water sheds, etc. If LILCO has access to the State maps, this should be referenced in the plan. There are also no lists of food processing facilities located outside the 50 mile EPZ, which process food originating within the 50 mile EPZ.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 42 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
J.12	<p>Using the cross-referenced sections for this element, the number of decontamination kits available, and their place of storage at each location could not be located in the plan.</p> <p>Based on a review of the equipment inventory listed in the plan, it is questionable whether the number of potential relocatees could be monitored within 12 hours.</p> <p>Neither Section 5.5 of Procedure OPIP 4.2.1, page 3 of 14, nor Section 5.0 of Procedure OPIP 3.9.2 describe the means for evacuee registration prior to monitoring. The procedures should describe clearly understood measures which, to the greatest extent practicable, minimize the likelihood for potentially contaminated persons to gain access to a relocation center where evacuees are to be housed, fed and cared for.</p> <p>Although Procedure OPIP 3.9.2 adequately covers the monitoring and decontamination of evacuees, more information is needed on the Red Cross responsibilities and procedures at the centers. There are no registration forms (other than exposure) supplied with the plan. There should be procedures for completing registration forms for non-contaminated individuals. The procedures should also specify where evacuee monitoring records will ultimately be maintained. Also, the available equipment shown for monitoring evacuees may not be sufficient to meet the 12-hour time limit within which all evacuees arriving at relocation centers must be monitored.</p>	I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 43 of 60

NUREG-0654

Element

Review Comment(s)

Rating

J.12      The NUREG-0654 cross-reference should be revised  
Cont.      to include Procedure 4.2.1 as a citation for  
            element J.12.

K.      Radiological Exposure Control

K.3.a      Page 3.9-2 of the plan states that all      I  
            emergency response personnel will be issued  
            self-reading pocket dosimeters and TLD's.  
            The LERO Dosimetry Coordinator is responsible  
            for maintaining exposure control records  
            on a 24-hour per day basis.

The plan states (page 3.9-2, line 8) that all emergency response personnel will be issued dosimeter chargers, yet the inventory lists in OPIP 5.3.1 show that insufficient numbers of chargers are available. Also, page 4.4-1, line 39, states that dosimeter chargers will be kept at each emergency worker staging area and wherever emergency workers receive dosimetry equipment. This is inconsistent with the statement that all emergency response personnel will be issued dosimeter chargers. The plan should clarify whether dosimeter chargers will be issued to each emergency worker, or whether dosimeters will be zeroed and distributed at the emergency worker staging areas. It is recommended that emergency workers should not be issued dosimeter chargers because it is possible that they could recharge their dosimeters in the field, thereby obviating the purpose of these instruments in recording cumulative exposure.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 44 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
K.3.b	Page 3.9-2 of the plan states that emergency workers inside affected areas are instructed to take dosimeter readings at 15 minute intervals. Emergency Worker Daily Dose and Permanent Dose Record forms are contained in Section 3.9 and also in Procedure OPIP 3.9.1. Section 3.9.A, page 3.9-3 of the plan states that emergency worker dose records will be maintained at the local EOC.	A
K.4	<p>The LILCO Transition Plan (Rev. 3) provides for emergency workers to be trained to inform their immediate supervisor if the reading on their low range dosimeter goes beyond the 200 mR that it will register. Pages 3.9-2 and 3 of the plan state that the Director of Local Response, as advised by the Radiation Health Coordinator, is responsible for authorizing exposures in excess of the EPA General Public PAGs.</p> <p>Page 3.9-3 lines 18-19 give an exposure guideline for hands and forearms of 200 R for lifesaving activities. This should be omitted, since such exposures apply to on-site rather than offsite environmental exposures.</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 45 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
X.5.a	<p>Tables 3.9.1 and 3.9.2 specify action levels for determining the need for decontamination.</p> <p>While Table 3.9.1 gives maximum acceptable contamination levels, there are several concerns with this table. "Probe shield open" readings in mr/hr have no value due to differences in beta energy and the efficiency of the probe. For all open window readings, CPM should be used, rather than mr/hr. The listings in Table 3.9.1 for skin, hair, clothing and vehicles are reasonable. However, the data in Procedure OPIP 3.9.2 do not correspond to these values.</p> <p>The threshold for decontamination in Table 3.9.1, and the values for release shown in Table 3.9.2 do not agree. Table 3.9.2 gives the NRC surface contamination levels for decommissioning nuclear power plants, which are too low for practical application under emergency conditions.</p>	I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 46 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
K.5.b	<p>Page 3.9-4, line 45 and page 4.3-2, line 5 of the plan and Procedure OPIP 3.9.2 (Section 5.8.1-C) state that any emergency worker with thyroid contamination resulting in readings in excess of .13 mR or 150 CPM, will be sent to a designated hospital for further medical treatment. Page 4.3-2 uses .13 mR/hr. as the lower limit. Procedure OPIP 3.9.2 has been changed to 120 CPM in Revision 3. The correct number should be identified and used consistently. The HP 270 probe identified in Procedure OPIP 3.9.2, Section 5.5.1a is unable to detect alpha activity.</p> <p>The decontamination techniques described in Procedure OPIP 3.9.2 are adequate. However, radiological decontamination equipment, supplies, and storage and disposal capability for contaminated waste associated with the decontamination process could not be located in the plan or procedures. Monitoring equipment including lists of supplies used for decontamination at the decontamination centers should be itemized, as well as quantities available.</p> <p>No indication of first aid administration or available kits could be found in the plan or procedures.</p>	I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 47 of 60

NUREG-0654

Element

Review Comment(s)

Rating

L. Medical and Public Health Support

- L.1 The plan (pages 2.2-2 and 3.7-2) identifies University Hospital in Stony Brook, New York and Central Suffolk Hospital in West Islip, New York as having the capability for handling injured, contaminated patients. I

The capability/expertise of medical facilities and personnel at Stony Brook Hospital and Central Suffolk Hospital that will be used to evaluate radiation uptakes and exposures should be described. No indication that personnel from these hospitals are prepared to handle contaminated individuals could be found in the plan.

- L.3 Procedure OPIP 4.2.2 contains a list of hospitals capable of treating contaminated injured individuals; however, the listing does not include their capacity and any special radiological capabilities. I

Procedure OPIP 4.2.2, although referenced in the NUREG cross-reference, is not referenced in section 3.7, Medical and Public Health Support of the plan. Procedure OPIP 4.2.2 should be referred to in Section 3.7, to ensure that the LERO Health Services Coordinator and staff are aware of these additional resources in the event they are needed.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 48 of 60

NUREG-0654

Element

Review Comment(s)

Rating

L.4

Page 3.7-1 of the plan states that the LERO Ambulance Coordinator will coordinate the services of trained emergency medical technicians, ambulances and rescue vehicles.

A

The plan is adequate in addressing this element provided that the list of ambulance companies with which LERO has letters of intent supported by finalized contracts will be contained in Procedure OPIP 4.2.2.

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 4.2.2 as a citation for element L.4.

LIHCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 49 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
M.	<u>Recovery and Reentry Planning and Postaccident Operations</u>	
M.1	<p>Section 3.10, pages 3.10-1 and 2 and Section 3.11, pages 3.11-1 and 2 of the plan and Procedure OPIP 3.10.1 discuss Re-entry and Recovery. Procedure OPIP 3.10.1 provides for participation of the following agencies/organizations on the Recovery Action Committee if they are available:</p> <ul style="list-style-type: none"><li>• FEMA representative</li><li>• DOE representative</li><li>• State representative</li><li>• County representative</li></ul> <p>Attachment 3.10.1 and Section 3.10 (Recovery/Re-entry) give no consideration to plant conditions, such as the probability of additional significant releases, continuing or intermittent low level releases, etc. Attachment 3.10.1 refers to acceptable levels for unrestricted release of property during a decommissioning of a facility (per Reg-Guide 1.86) and are not related to recovery from an emergency. Procedure OPIP 3.10.1 notes that the plant must be stable, no significant releases occurring, etc. as precautions for entering Recovery. However, there is no indication of who determines whether these conditions have been satisfied. Consequently, Recovery/Re-entry Procedures 3.10.1 are based upon incomplete considerations. An evacuation is not necessarily a prerequisite for recovery. Due to time constraints, sheltering may have to be implemented rather than evacuation.</p> <p>It should be indicated in Section 3.11 that post-emergency phase activities are a responsibility of EPA as per the RMAP.</p>	I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 50 of 60

NUREG-0654

Element

Review Comment(s)

Rating

M.3

The LERO Director of Local Response is responsible for instructing all Recovery Action Committee coordinators to notify members of the response organization when recovery operations have been initiated (see Procedure OPIP 3.10.1, Sections 5.3.4 and 5.3.6).

A

M.4

The referenced section of the plan provides for the completion of radiation field surveys to determine whether contamination levels in an evacuated area are within acceptable limits for reentry of the public into formerly contaminated areas.

I

No "method" for estimating total population exposure could be found on page 3.10-2 of the plan which is cross-referenced for this element. The plan should establish a method for estimating total population exposure, not merely state that an organization will be established for this purpose.

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 51 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
----------------	--------------------------	---------------

N.	<u>Exercises and Drills</u>	
----	-----------------------------	--

N.1.a	The referenced section of the plan describes the purpose, scope, frequency and procedures for exercises. The plan states that an exercise shall simulate an emergency that results in offsite radiological releases which would require the overall emergency response capabilities of SNPS, FEMA and LERO.	A*
-------	---	----

The following revisions should also be made to portions of the plan dealing with exercises:

- Accident Assessment and Evaluation, and Emergency Response Facilities, should be added to the list on page 5.2-3, B, lines 22-36, of capabilities to be tested in exercises.
- FEMA should be deleted from line 15 on page 5.2-3 since FEMA does not test its response capability in every exercise.

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

N.1.b	The plan contains no provision for the mobilization of State and local personnel and resources in order to verify responses during exercises. However, the plan does establish the means for mobilizing LERO personnel and resources that would be adequate to verify the capability to respond to an accident scenario requiring response.	A*
-------	---	----

\*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 52 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

N.2.a      The plan adequately addresses the testing of communications systems with the following:

A

- Federal emergency response organizations and states within the ingestion pathway - quarterly,
- The nuclear facility (SNPS) - annually,
- The State and local (LERO) EOCs - annually
- Local (LERO) radiological monitoring team - annually

The plan provides for drills of communication with the state and local EOCs.

The NUREG-0654 cross-reference should be revised to include Procedure OPIP 3.4.1 as a citation for element N.2.a.

N.2.c      Page 5.2-2a of the plan and Procedure 5.1.1, Section 5.2.2.1.c adequately provide for a Medical Drill to be conducted annually in conjunction with the annual exercise.

A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 53 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
N.2.d	<p>The referenced section of the plan provides for radiological monitoring drills.</p> <p>The plan is adequate in addressing this element provided that it is clarified in the plan whether DOE-RAP personnel will participate in the radiological monitoring exercises. This clarification is requested since the letter of agreement between DOE and LILCO limits DOE radiological assistance to "advice and emergency action essential for the control of immediate hazards to health and safety" (i.e., in an actual emergency) - see Appendix B, page APP-B-1.</p>	A
N.2.e.(1)	<p>Page 5.2-2 of the plan and Procedure OPIP 5.1.1, Section 5.2.2.1.d. adequately provide for health physics drills to be conducted semi-annually.</p>	A
N.3.a-f	<p>The referenced section of the plan adequately provides for exercise scenarios to include the following:</p> <ul style="list-style-type: none"><li>• The basic objectives;</li><li>• The date(s), time period, place(s) and participating organizations;</li><li>• The simulated events;</li><li>• A time schedule for real and simulated initiating events;</li><li>• A narrative summary describing the conduct of exercises or drills;</li><li>• Arrangements for scenario material to be provided to official observers.</li></ul> <p>Provisions for, and the use of, protective clothing should be added to Section 5.2 page 5.2-1, line 12.</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 54 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
N.4	Section 5.2, pages 5.2-1 and 5.2-4, lines 4-6, 14 and 15 of the plan establishes that the LILCO Emergency Planning Coordinator (EPC) is responsible for conducting exercises that will be critiqued by observers from Federal, State and local governments.	A
N.5	<p>Procedure OPIP 5.1.1, Sections 5.2.6 and 5.2.7 adequately provide for LERO to evaluate observer and participant comments and implement corrective actions. The LILCO Emergency Planning Coordinator is responsible for incorporating plan changes indicated as a result of the drills and annual exercise critiques.</p> <p>Procedure OPIP 5.1.1, Section 5.2.6.5 makes the following provision:</p> <p style="padding-left: 40px;">"The EPC (Emergency Planning Coordinator) shall collect and evaluate all exercise/drill records including checklists, logs, LERO Observation Sheets, survey reports, etc. from LERO, <u>federal</u>, state, and local observers and keep them on file." (Emphasis added)</p> <p>This provision is beyond the scope of FEMA's policy on the Availability of Records under the Freedom of Information Act Relating to State and Local Radiological Emergency Plans and Preparedness Program per the June 30, 1983 memorandum for Regional Directors from James L. Holton, Director, Office of Public Affairs, and George Jett, General Counsel which states:</p>	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 55 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

N.5  
Cont.

The critiques of individual members of the Regional Assistance Committee (RAC) evaluating the effectiveness of a Radiological Emergency Preparedness exercise qualify for withholding under the Freedom of Information Act pursuant to 5 U.S.C. 552(b)(5).

According to policy guidance from the Department of Justice, the purpose of the (b)(5) exemption is to assure:

presidents, agency heads, and other decisionmakers that they can safely welcome a full spectrum of candid expressions from their staffs and/or peers, because they will be free to accept or reject all such input on its apparent intrinsic merit, not on whether a particular staff memorandum may make the official's action look better or worse, especially if the action is controversial or later proves unsuccessful....

Federal Observers should be deleted from Section 5.2.6.5 of Procedure OPIP 5.1.1. However, the statement should be added to Procedure OPIP 5.1.1 to read that Federal comments for the exercise are provided by FEMA in the post-exercise assessment which summarizes the evaluation of the Federal Observers.

LILCO Transition Plan for Shoreham - Revision 3

Consolidated RAC Review

Dated February 10, 1984

Page 56 of 60

NUREG-0654

Element

Review Comment(s)

Rating

- O. Radiological Emergency Response Training
- O.1 Section 5.1, pages 5.1-3 through 5.1-5 of the plan and the LERO Training Matrix (Figure 5.1.1) provide emergency response training for LERO personnel through a training program consisting of 21 modules. Radiological emergency response training is included. Also, tapping the Federal sector, LILCO would avail itself of approximately 12 courses, some given by FEMA, some by NRC, and some by EPA. The Red Cross would also be utilized, providing six training courses.
- Procedure OPIP 5.1.1, Section 5.1.5 provides that the records maintained by LILCO will show the names and emergency position of individuals trained, the instructor's name, and the dates on which they received training.
- O.1.b Procedure OPIP 5.1.1, Section 5.1.3 states that Emergency Response Training will be offered to all members of LERO support organizations, such as the U.S. Coast Guard and ambulance personnel. Since there are no mutual aid agreements with local police and fire organizations, the procedure does not offer training for these personnel. This training should be offered to "all local law enforcement agencies and fire departments within the 10-mile EPZ," which are anticipated to carry out their normal emergency response functions during a radiological emergency at SNPS.

A

I

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 57 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
0.4	The referenced section of the plan establishes a training program for emergency response personnel which is keyed to specific emergency response training topics. The following subelements of this planning criteria have been reviewed as follows:	
	0.4.a Directors or coordinators who are LILCO employees. However, clarification is needed between the plan and LERO Training Matrix on identification and content of Module 15.	A
	0.4.b No provision has been included for training of Radiological Health Managers, nor for anyone in LERO, to evaluate the implication of plant conditions in protective action recommendations.	I
	0.4.c Radiological monitoring teams and radiological analysis personnel	A
	0.4.d Police, security and fire fighting personnel are to be filled by personnel with whom LILCO/LERO does not have a mutual aid agreement supported by a letter of agreement.	I
	0.4.f First aid and rescue personnel	A
	0.4.g Local support services personnel	A
	0.4.h Medical support personnel	A
	0.4.j Personnel responsible for transmission of emergency information and instructions.	A
0.5	Except as noted above for specific functions, Chapter 5, Section 5.1 of the plan, Training, states that LILCO will provide for periodic retraining on at least an annual basis for personnel with emergency response responsibilities.	A

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 58 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
P.	<u>Responsibility for the Planning Effort</u>	
P.1	The referenced section of the plan and implementing procedures provide for the training of LERO personnel who are responsible for the planning effort.	A*
P.2	The LILCO Emergency Planning Coordinator (EPC) is responsible for the administration of the LILCO Transition Plan (all revisions).	A*
P.3	The LILCO EPC is responsible for conducting an annual review and update of the LILCO Transition Plan including procedures and letters of agreement.	A*
P.4	The LILCO EPC is responsible for incorporating plan and procedure changes resulting from exercises and assigning the responsibility for implementing corrective actions.	A*

As noted above, various agreements necessary to implement the LILCO Transition Plan are not included at this time. The plan is adequate in addressing this element provided that the agreements necessary to implement the LILCO Transition Plan are included in the plan and updated annually.

\*These elements are adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 59 of 60

NUREG-0654

<u>Element</u>	<u>Review Comment(s)</u>	<u>Rating</u>
P.5	The LILCO EPC is responsible for distributing the LILCO Transition Plan and approved changes to the organizations and appropriate individuals responsible for their implementation. Pages for revisions 1, 2 and 3 do not carry revision dates. Effective revision dates should be added to all pages as they are changed.	A*
P.6	Section 1.4, pages 1.4-1 and 1.4-2, and attachment 1.4.2, contain the required list of supporting documents.	A
P.7	<p>Appendix C to the plan lists by title, the procedures required to implement the plan.</p> <p>References to the following procedures could not be located in the narrative sections of the plan.</p> <ul style="list-style-type: none"><li>● 1.1.1 Offsite Preparedness Implementing Procedure Development</li><li>● 3.6.4 Bus Routes</li><li>● 3.6.5 Special Evacuations</li><li>● 3.7.1 Public Health Support</li><li>● 4.1.2 EOC Documentation and Record Keeping</li><li>● 4.2.1 Relocation Center Operations</li></ul>	A
<p>*This element is adequately addressed in the plan. However, concerns pertaining to LERO's legal authority to implement the plan were identified by the RAC during this review (see Attachment 2, Legal Concerns for details).</p>		

LILCO Transition Plan for Shoreham - Revision 3  
Consolidated RAC Review  
Dated February 10, 1984

Page 60 of 60

NUREG-0654  
Element

Review Comment(s)

Rating

P.8      The plan contains a specific Table of Contents, and is cross-referenced to NUREG-0654 criteria. However, the cross-reference should be revised to include the citations that are not indexed as noted in the above comments. Also, the applicability of the following references to the NUREG-0654 criteria elements listed below should be clarified, or these references should be deleted from the NUREG-0654 cross-reference submitted with the plan.

I

NUREG-0654  
Element

Reference Cited in Plan

..2.a  
J.10.h  
J.10.j

Section 3.11 - attachment 3.11.1  
Appendix A - Fig. 9 Zone A  
Procedure OPIP 3.3.2

P.10.      Section 5.4, page 5.4-2 of the plan states that the telephone number lists will be updated on a quarterly basis, and more frequently, if necessary. Also, Procedure OPIP 5.4-1, Section 5.4.4 calls for telephone numbers in emergency procedures to be updated quarterly.

A

## ATTACHMENT 2

### CONCERNS PERTAINING TO LERO'S LEGAL AUTHORITY IDENTIFIED DURING RAC REVIEW OF LILCO TRANSITION PLAN FOR SHOREHAM - REVISION 3

February 10, 1984

Below, are the legal concerns identified during the RAC review of the LILCO Transition Plan for Shoreham - Revision 3. For easy reference, each NUREG-0654 element affected by the legal concern(s) is restated, followed by the RAC comments.

- A.1.a. Each plan shall identify the States, local, Federal and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones. (See Appendix 5).

With neither State nor local support or participation in the emergency planning process, the following legal authority concerns have been identified:

- command and control responsibilities
- coordination with local and State authorities including law enforcement agencies and fire departments
- coordination with contiguous State and local governments
- LERO's ability to seek a declaration of a State of emergency and to request State and Federal assistance
- arrangements for agreements with emergency response organizations and/or individuals
- responsibility for alerting and notification of the public

- A.1.d. Each organization shall identify a specific individual by title who shall be in charge of the emergency response.

The plan assigns responsibility for "protecting the health and safety of residents and transients within the Emergency Planning Zones (EPZs) defined in this plan" (page 2.1-1, lines 37-41), to the LERO Director of Local Response. At this time, LERO Director of Local Response has the responsibility for "decision making and strategic controls", and responsibility to "decide upon the major responses to be made" (see page 3.1-1, lines 15-17). The concern is whether or not LERO has the authority to implement decisions that are made.

- A.2.a. Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other. (See Section B for licensee).

For Comments, See A.1.a.

- A.2.b. Each plan shall contain (by reference to specific acts, codes or statutes) the legal basis for such authorities.

Attachment 1.4.1 in the Plan refers to legal authority under 10 CFR 50.47 (c)(1).

The utility has developed LERO, comprised of utility, Federal and private individuals. If New York State and Suffolk County implement an emergency plan, LERO would follow their lead (see Section 1.4, pages 1.4-1, 1.4.2; also, Attachments 1.4.1 and 1.4.2). The authority of LERO to implement this plan under NRC codes and regulations and New York State Executive Law, as well as the issue of LERO's police power authority, has not been resolved.

- A.3. Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

During the RAC review, the following legal concerns were identified:

- ° LERO's authority to enter into agreements and/or contracts with emergency response organizations identified in the plan
- ° No signature page format nor reference(s) to laws, regulations or executive orders requesting response by local agencies specified in the plan could be found

- C.1. The Federal government maintains in-depth capability to assist licensees, States and local governments through the Federal Radiological Monitoring and Assessment Plan (formerly Radiological Assistance Plan (RAP) and Interagency Radiological Assistance Plan (IRAP). Each State and licensee shall make provisions for incorporating the Federal response capability into its operation plan, including the following:
- a. specific persons by title authorized to request Federal assistance, see A.1.d., A.2.a.

The plan provides for the LERO Director of local response to "Request the Governor to ask the President to declare an Emergency or Disaster". The legal basis for this procedure has not been identified in the plan.

- C.4. Each organization shall identify nuclear and other facilities, organizations or individuals which can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement. For Comments - See A.3.

- E.5 State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and followup messages received from the licensee including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

LERO has established a network of Long Island radio stations for disseminating emergency information to the public. LERO's authority to disseminate emergency information to the public without the involvement of State and/or local government officials remains a concern.

- E.6. Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instructions to the public within the plume exposure pathway Emergency Planning Zone. (See Appendix 3.) It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

The official EBS system authorized by the Federal Communication Commission (FCC) is used by government officials to disseminate emergency information to the public. LERO's legal authority to activate the alert and notification system without State and/or local government participation remains a concern.

- F.3. Each organization shall conduct periodic testing of the entire emergency communications system (see evaluation criteria H.10, N.2.a and Appendix 3).

No statement that State and local governments will participate in communication drills with LERO could be located in the plan.

- G.3.a. Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

The plan does not specify the level of involvement by State and local officials in the development and/or review of EBS and news releases (see comment E.5).

- H.4. Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

Without a State Site Specific Plan for the SNPS, there are no procedures specified for the activation and staffing of the State EOC in the event of a radiological emergency at the Shoreham site. Therefore, provision for the notification and mobilization of personnel to coordinate the State's interface with the LERO response remains a concern.

J.10.a. Maps showing evacuation routes, evacuation areas, preselected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas; (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan);

The Evacuation Plan (Appendix A Section I - Preface pages I-1 to I-2) is made up of two plans -- a study performed by Suffolk County as part of an agreement with LILCO (9/21/81), and a study performed by KLD Associates under an agreement with LILCO to develop an evacuation plan (12/30/81). LILCO has integrated the two studies into Appendix A.

Since Suffolk County is not participating in the offsite emergency planning process, are the data developed by Suffolk County under contractual agreement on emergency response planning executed in 1981, still applicable.

J.10.c. Means for notifying all segments of the transient and resident population;

As noted in analysis comments E.5 and E.6, LERO's legal authority to activate the alert and notification system and to disseminate emergency information to the public without the involvement of the State and/or local government remains a concern.

J.10.f. State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the predetermined conditions under which such drugs may be used by offsite emergency workers;

The authority of the Health Services Coordinator to authorize the use of KI for other LERO emergency workers who are not LILCO employees is of concern, since the "State Health Department" would not be involved in the decision-making regarding use of KI by emergency workers.

J.10.j. The organization's plans to implement protective measures for the plume exposure pathway shall include:

Control of access to evacuated areas and organization responsibilities for such control;

Since the staff assigned to Traffic Control are LILCO employees, the ability to accomplish this effort under the authority of 10 CFR 50.47 remains a concern.

Assigning access control duties to LILCO employees including:

- setting-up and controlling roadblocks
- dealing with evacuation etc., remains a concern

J.10.k. Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures;

According to page 2.2-4 of the plan, it is anticipated that snow removal will be provided by local organizations in their normal fashion during an emergency.

LERO's coordination with local agencies responsible for snow removal needs to be addressed to ensure that snow removal is in accordance with the evacuation scheme in case of a radiological emergency. In addition, LERO's authority to remove impediments to evacuation remains a concern.

N.1.a. An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases which would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

Since New York State and Suffolk County are not participating in the planning process, the testing of integrated capability of the offsite authority(s) remains a concern.

N.1.b. An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide a critique of the annual exercise by Federal and State observers/evaluators. The scenario should be varied from year to year such that all major elements of the plans and preparedness organizations are tested within a five-year period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. once every six years. Exercises should be conducted under various weather conditions. Some exercises should be unannounced.

Since New York State and Suffolk County are not participating in the planning process, mobilization of their personnel and resources during an exercise remains a concern.

P.1. Each organization shall provide for the training of individuals responsible for the planning effort.

P.2. Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.

- P.3. Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.
- P.4. Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.
- P.5. The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

NUREG-0654 mandates an integrated approach to the development of offsite radiological emergency plans by States, localities, and licensees.

Since New York State and Suffolk County are not participating in the development, updating of and training for a radiological emergency plan for Shoreham, the lack of an integrated approach to offsite radiological emergency preparedness remains a concern.