



Federal Emergency Management Agency

Washington, D.C. 20472

APR 2 1984

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

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

SUBJECT: Offsite Emergency Preparedness at Diablo Canyon

Reference is made to your memorandum dated December 27, 1983, Subject: Emergency Preparedness for Diablo Canyon Full Power License. The following is a report on the current status of offsite emergency preparedness.

Attachment 1 provides an update and summary of the status of the corrective actions for the 12 deficiencies reported in my memoranda of November 17 and December 29, 1981. Corrective actions have been satisfactorily completed; therefore, there is now reasonable assurance that an adequate level of emergency preparedness exists in San Luis Obispo County.

Attachment 2 addresses the four items considered by the Atomic Safety and Licensing Board (ASLB) to be requirements and the seven items considered to be recommendations. The current status of the four required items is detailed below. Action has been satisfactorily completed on item numbers 1, 2, and 4.

1. As indicated above, the 12 deficiencies have been satisfactorily completed.
2. Written agreements have been signed by the head of each State agency agreeing to perform their assigned functions. Standard Operating Procedures (SOP's) for county departments, local offices of State agencies, cities, fire districts, school districts, colleges and universities, and volunteer agencies have been developed. Attachment 3 is a list of the SOP's and the date each was prepared or last revised. They are contained in Part III of the San Luis Obispo County Plan and were furnished to the Nuclear Regulatory Commission (NRC) Region V as an attachment to a January 19, 1984, letter from the Pacific Gas and Electric Company. Note that within the 10-mile plume exposure emergency planning zone (EPZ), all but two city SOP's have been developed in final form.
3. The San Luis Obispo County Nuclear Power Plant Emergency Response Plan, dated August 1982, was approved by the County Board of Supervisors on September 27, 1982, for adoption by the Chairman of the County Board. A copy of this plan was furnished to the NRC Division of Licensing as an attachment to an October 27, 1982, letter from the Pacific Gas and Electric Company. Supporting draft plans have been developed by the State but were not submitted to FEMA Region IX until November 8, 1983.

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The FEMA Region IX Regional Assistance Committee (RAC) is currently reviewing the 6,000 page document that was submitted by the State. In the State of California, under State law, local government has the prime responsibility for protection of the public. The State of California Nuclear Power Plant Emergency Response Plan states: "In areas surrounding nuclear power plants, for the direct (or plume) exposure pathway, local governments are responsible for implementing protective actions to protect their populations from exposure. State and Federal agencies provide support; Office of Emergency Services (OES) will coordinate state mutual aid as well as requesting and coordinating Federal aid." While FEMA considers that the revised State of California plan would be adequate for the State to utilize in the event it should be needed, we have not completed our review of the entire document. This is scheduled for completion by the middle of May 1984. As soon as possible thereafter, we will provide additional comments on the State plan.

4. NUREG-0654/FEMA-REP-1, Rev. 1, does not require that monitor receivers be installed in schools, hospitals, and other institutions if other means exist for warning the public in these areas. In San Luis Obispo County, 45 sirens provide adequate coverage in the 10-mile EPZ. There are an additional 49 sirens in the State's expanded 20-mile plume exposure EPZ. During the most recent alert and notification test conducted on August 13, 1983, 92 of the 94 sirens functioned properly when tested. Further, the cause of the malfunction of the two has been determined and corrective action taken.

The county has, however, installed tone-alert receivers in all schools, hospitals, and institutions for additional warning capability. These tone-alert receivers, activated by the county sheriff's dispatch office, are tested twice monthly.

As to the seven items considered by the ASLB to be recommendations, the status of actions are contained in Part B of Attachment 2. In addition, updates of the following items should be noted:

1. The county has now obtained some 75 letters of agreement and this effort is essentially complete.
2. During the last year, the reliability of the county radio micro-wave and VHF systems has been very good.
5. As indicated above, a revised State plan has been received by FEMA Region IX and is currently being reviewed by the FEMA Region IX RAC. This review will assure that the State plan does contain recovery and reentry planning detail based on existing State law regarding levels of contamination.
7. A second distribution of the public information brochure for Diablo Canyon was completed during October 1983.

Attachment 4, including the October 20, 1982 exercise report, is furnished for your information and files. As indicated in Attachment 5, copies of the FEMA report for the October 19, 1983, exercise were furnished to the State of California on February 9, 1984. FEMA Region IX met with representatives from the State and local governments on March 8, 1984, for discussion of all corrective actions required. The State was requested to further respond in writing in early April 1984. As soon as the State's response is received, it will be analyzed and the results sent to you. Notwithstanding the deficiencies identified in Attachments 4 and 5, an adequate level of emergency preparedness now exists in San Luis Obispo County to assure the protection of the health and safety of the public in the event of a radiological emergency.

Attachments:

- (1) Memorandum from Vickers to McLoughlin; dated April 8, 1983,
Subject: Federal Emergency Management Agency (FEMA) Region IX
Evaluation and Status Report on State and Local Emergency
Preparedness Around the Diablo Canyon Nuclear Power Plant.
- (2) Memorandum from Vickers to Krimm; dated April 14, 1983,
Subject: Response to the Brian Grimes Memorandum to You
dated October 26, 1982, Regarding the Initial Decision on
a Full Power License for Diablo Canyon.
- (3) San Luis Obispo County Emergency Response Plan Standard
Operating Procedures.
- (4) Memorandum from Vickers to Krimm; dated November 10, 1982,
Subject: Exercise Evaluation Findings - Diablo Canyon
Nuclear Generating Station Exercise of October 20, 1982.
- (5) Memorandum from Krimm to Jordan; dated February 2, 1984,
Subject: Exercise Report for the October 19, 1983, Exercise
of the Offsite Radiological Emergency Preparedness Plans
for the Diablo Canyon Nuclear Generating Station.

ATTACHMENT 1



Federal Emergency Management Agency

Region IX Building 105
Presidio of San Francisco, CA 94129

APR 8 1983

MEMORANDUM FOR: DAVE MCLOUGHLIN, DEPUTY ASSOCIATE DIRECTOR
STATE AND LOCAL PROGRAMS AND SUPPORT

FROM: *[Signature]* ROBERT L. VICKERS, REGIONAL DIRECTOR
FEMA REGION IX

SUBJECT: FEMA REGION IX EVALUATION AND STATUS REPORT ON
STATE AND LOCAL EMERGENCY PREPAREDNESS AROUND THE
DIABLO CANYON NUCLEAR POWER PLANT

This memorandum completes the interim finding on this subject sent to The Associate Director, State and Local Programs Support Directorate on November 2, 1981.

The necessary corrective actions pointed out in Part IV of that document have been accomplished to the satisfaction of FEMA Region IX and the county plan was approved by the San Luis Obispo Board of Supervisors on September 27, 1982 and submitted to the State for formal review.

The status of each of the corrective actions is summarized below and keyed to the format of Part IV of the interim finding.

- E. 1. Region IX has reviewed the technical specifications for design and maintenance of the warning system and found them to be acceptable. The Utility will provide regular submissions to FEMA of maintenance and testing logs that demonstrate the continuance of the operating reliability standards that now exist in the offsite warning system. This includes both the warning devices and the entire radio system that activates them. If the system reliability falls below 95%, FEMA will notify NRC and recommend corrective measures as stated in FEMA Guidance Memorandum # 18.
2. Pagers have been provided to key County response personnel for alerting.
3. A reliable communications link consisting of both a two-way radio capability and a dedicated telephone line has now been established between the EOC and the two EBS radio stations designated in the plan. The two-way radio equipment was installed during November 1982 and the associated staff training will be completed by the end of April, 1983. An agreement between the two radio stations and the County regarding dissemination of emergency instructions to the public exists in the EBS Operational Area Plan for San Luis Obispo.

4. The public warning system has been installed, tested and upgraded as a result of that testing. The warning system is considered adequate on a preliminary approval basis pending confirmation by the FEMA statistical sample of population in the plume exposure zone called for by NUREG 0654. FEMA is currently developing a statistical sampling method which will be applied uniformly across the country.
- F. The County radiological monitor teams have been supplied with radios to establish a direct link to the County Unified Dose Assessment Center. Eleven handitalkies and ten converta-coms have been provided to allow them to operate both in and out of their vehicles.
- G. The Emergency Response Plan Booklet for the Diablo Canyon Power Plant was distributed to residences and businesses in the plume exposure zone during October of 1982. Siren information signs have been posted in recreation areas in the plume exposure zone to address the transient population.
- H.
 1. Additional telephone capability was provided in the EOC and was used satisfactorily in the October 20, 1982 exercise.
 2. The current EOC/EOF now has emergency lighting equipment. The communications equipment is currently powered from the sheriff's office and has emergency power. The new EOC/EOF will have an emergency generator to provide a backup power source for the entire facility.
 3. A ringdown telephone system to the cities in the plume exposure zone was installed in the EOC and used during the October 20, 1982 exercise.
- K. Emergency worker kits containing high and low range dosimeters with exposure cards, a permanent record device, Potassium Iodide Tablets and an emergency worker standard operating procedure have been prepared and distributed within the County.
- N. The annual drill and training schedule for the County has been established and the training activities are taking place.
- O. The required radiological emergency response training is being provided to both the radiological monitors and emergency workers.

DAVE MCLOUGHLIN
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As a result of the satisfactory completion of these corrective actions the interim finding should be updated to show that we now believe, with reasonable assurance, that an adequate level of emergency preparedness exists in San Luis Obispo County.

ATTACHMENT 2



Federal Emergency Management Agency

Region IX Building 105
Presidio of San Francisco, CA 94129

APR 14 1983

MEMORANDUM FOR: Richard W. Krimm, Assistant Associate Director
State and Local Programs and Support

FROM: *[Signature]* Robert D. Vickers, Regional Director
RIX

SUBJECT: Response to the Brian Grimes Memorandum to
You Dated October 26, 1982 Regarding the
Initial Decision on a Full Power License for
Diablo Canyon

The response date for the memorandum was changed from November, 1982 to April, 1983 through negotiations with NRC staff due to the repeated postponements of hearings by the Licensing Board on this subject. The memo requested FEMA to address four items considered by the board to be requirements prior to issuance of a full power license and seven items considered to be recommendations. This response follows the same format provided in the Brian Grimes memo.

A. Requirements Prior to Issuance of a Full Power License

1. The 12 deficiencies noted by FEMA in the November 2, 1981 Interim Finding have been corrected and a memorandum dated April 8, 1983 was sent to Dave McLoughlin from FEMA Region IX to close out that finding.
2. The State of California Office of Emergency Services has on file memoranda of agreement signed by the head of each state agency agreeing to perform their assigned functions. In addition, each of these state jurisdictions have signed their standard operating procedures which are part of the local Emergency Response Plan.

The county emergency plan contains 22 standard operating procedures (SOPs) that involve the federal plume exposure zone. These SOPs include county departments, state agencies, fire districts, a school district and a city. Only one of these SOPs has not been signed at this point in time. Although the SOP for the county superintendent of schools is signed, the San Luis Coastal Unified School District SOP has been under review by a committee that has met once a week since October of 1982. They have completed their review and have prepared a number of recommendations for the District School Board. Since there continues to be disagreement on several issues it may take the District

School Board some time to reach final decisions on these recommendations and sign off on that SOP.

3. In the State of California, the state plan gives local government the prime responsibility for protection of the public. Page 24 of the State of California Nuclear Power Plant Emergency Response Plan of July, 1975, revised March, 1981, states "In areas surrounding nuclear power plants, for the direct (or plume) exposure pathway, local governments are responsible for implementing protective actions to protect their populations from exposure. State and federal agencies provide support; OES will coordinate state mutual aid as well as requesting and coordinating federal aid".

The San Luis Obispo County Nuclear Power Plant Emergency Response Plan was approved by the County Board of Supervisors on September 27, 1982 and submitted to the State Office of Emergency Services. Supporting plans have been developed by the state but were not submitted in July of 1982 as originally anticipated. A copy of the state plan is now scheduled to be provided to FEMA in May of 1983. We are not able to estimate when the county and state plans will be formally submitted under the FEMA Proposed Rule 44 CFR Part 350.

4. NUREG 0654/FEMA REP-1 does not require that monitor receivers be installed in schools, hospitals and other institutions if other means exist for warning the public in these areas. In San Luis Obispo County there is adequate siren coverage in the 10 mile EPZ, however, the county has installed tone-alert receivers in all schools, hospitals and institutions for additional warning capabilities. These tone-alert receivers are activated by the county sheriff's office.

B. Recommendations

1. The county estimates that they are now 75% complete in obtaining letters of agreement to secure various public and private resources. Letters are on file at the county for resources including, service stations, towing companies, bus companies, congregate care facilities etc.
2. The county has established an adequate technical staff to maintain the system and has embarked on a preventive maintenance program on the radio micro-wave system. FEMA RIX is requiring a maintenance reporting system which will allow

FEMA RIX staff to closely monitor the reliability of the county radio micro-wave and VHF systems. If system failures become apparent, FEMA RIX will require the county to take appropriate actions to remedy the problem.

3. The requirement for an integrated emergency medical system is appropriate. The county did not receive funds for developing a system under the EMS3 Act, but they have developed a plan that appears to be along the same lines as intended by the EMSS Act. The medical emergency response for an incident at Diablo Canyon has been integrated with the overall county medical response plan.
4. The State Radiological Health Bureau has developed a list of hospitals and medical facilities that indicate special radiological capabilities in accord with the intent of criteria L (3) of NUREG 0654.
5. A copy of the state plan has not yet been provided to FEMA, see Item A.3. above. Consultation with State Office of Emergency Service Planners indicates that the state plan contains recovery and re-entry planning detail based on existing state law regarding levels of contamination.
6. The problem of role conflict is addressed as part of the emergency worker training course provided by the State Office of Emergency Services.
7. The Emergency Response Plan Booklet for the Diablo Canyon Power Plant was distributed to residential and business addresses in the plume exposure zone during October, 1982; a second general distribution is scheduled for October, 1983.

ATTACHMENT 3

SAN LUIS OBISPO COUNTY
EMERGENCY RESPONSE PLAN
STANDARD OPERATING PROCEDURES

<u>III.01-III.13</u>	<u>County Department SOP's</u>	<u>Date of Preparation/Revision</u>
III.01	County Emergency Services	May 1983
III.02	County Sheriff's Department	December 1982
III.03	County Fire Department	April 1983
III.04	County Engineer	June 1982
III.05	County Health Agency	August 1982
III.06	County Environmental Health Division	August 1982
III.07	County Social Services	May 1983
III.08	County Public Information Officer	May 1983
III.09	County Technical Services	August 1982
III.10	County General Services	May 1983
III.11	County Counsel	February 1983
III.12	County Agricultural Commissioner	August 1982
III.13	County Air Pollution Control District	August 1982
<u>III.20-III.25</u>	<u>Local Offices of State Agencies and Other Organizations SOP's</u>	
III.20	California Highway Patrol	March 1982
III.21	CalTrans	February 1983
III.22	Department of Parks and Recreation	May 1982
III.23	American Red Cross	July 1982
III.24*	California Polytechnic University	July 1983
III.25	California Men's Colony	May 1982
<u>III.30-III.34</u>	<u>Cities SOP's</u>	<u>Date of Preparation/Revision</u>
III.30	City of Morro Bay	May 1983
III.31*	City of San Luis Obispo	June 1982
III.32*	City of Pismo Beach	March 1982
III.33	City of Arroyo Grande	March 1983
III.34	City of Grover City	September 1982
<u>III.40-III.46</u>	<u>Fire Districts SOP's</u>	
III.40	Avila Beach Fire District	December 1981
III.41	Cayucos Fire District	May 1983
III.42	Oceano Fire District	May 1983
III.43	South Bay Fire District	April 1982
<u>III.50-III.55</u>	<u>Schools SOP's</u>	
III.50	County Superintendent of Schools	April 1982
III.51	San Luis Coastal Unified School District	August 1983
III.52	Atascadero Unified School District	April 1983
III.53	Unassigned	
III.54	Lucia Mar Unified School District	April 1983
III.55	Cuesta College	April 1982

* Procedure issued in draft form

ATTACHMENT 4



Federal Emergency Management Agency

Region IX Building 105
Presidio of San Francisco, CA 94129

November 10, 1982

MEMORANDUM FOR: Richard W. Krimm, Assistant Associate Director
State and Local Programs and Support
Office of Natural and Technological Hazards

ATTENTION: Vernon Adler, Chief
Technical Hazards Division

FROM: *[Signature]* Robert L. Vickers
Regional Director

SUBJECT: Exercise Evaluation Findings - Diablo Canyon Nuclear
Generating Station

On October 20, 1982, an offsite Emergency Response Plans Exercise was conducted for the Diablo Canyon Nuclear Generating Station.

Attached for your information are the Findings and Recommendations covering the exercise.

Should you have any comments regarding this evaluation, please contact me or Thomas Brinton, Chief, Natural and Technological Hazards Division, Region IX.

Attachment