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RELATED CORRESPONDENCE  
UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

DOCKETED  
USNRC

\*84 JUL 19 110:59

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

CERTIFICATE OF SERVICE

I hereby certify that copies of the Federal Emergency Management Agency's Testimony on Contentions 16E and 18 and three memorandums\* relating to the NRC request of a FEMA Review of Revision 4 of the LILCO Transition Plan have been served on the following by deposit in the United States mail, first class, this 16th day of July 1984:

\*Memorandum dated July 9, 1984 from Edward L. Jordan to Richard W. Krimm, Subject: FEMA Review of the LILCO Transition Plan for Shoreham in Support of NRC Licensing; Memorandum dated July 11, 1984 from Richard W. Krimm to Edward L. Jordan, Subject: FEMA Review of the LILCO Transition Plan for Shoreham in Support of the NRC Licensing; Memorandum dated July 12, 1984 from Samuel W. Speck to Frank P. Petrone, Subject: Review of Revision IV of the LILCO Transition Plan.

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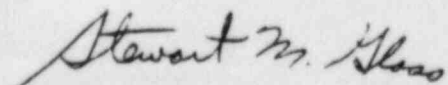
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

JUL 9 1984


MEMORANDUM FOR: Richard W. Krimm, Assistant Associate Director  
Office of Natural and Technological Hazards  
Federal Emergency Management Agency

FROM: Edward L. Jordan, Director  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

SUBJECT: FEMA REVIEW OF THE LILCO TRANSITION PLAN FOR SHOREHAM IN  
SUPPORT OF NRC LICENSING

In accordance with the NRC/FEMA Memorandum of Understanding dated November 1980, we request that FEMA review Revision 4 to the Shoreham Nuclear Power Station Local Offsite Radiological Emergency Response Plan (i.e., the Transition Plan) which was submitted to the NRC by LILCO on June 29, 1984. As noted in the submittal cover letter, Revision 4 responds to comments in the FEMA report dated March 15, 1984, which were developed by the Regional Assistance Committee (RAC) as a result of a review of Revision 3 of the LILCO Transition Plan. In the June 29, 1984 letter, LILCO states that copies of Revision 4 have been forwarded under separate cover directly to members of the RAC. Additional clarifying information regarding Revision 4 is contained in a letter to the Atomic Safety and Licensing Board from the LILCO counsel dated July 2, 1984, copies of which were also sent to the RAC. For your information, copies of the above-referenced letters are enclosed.

We request that Revision 4 of the LILCO Transition Plan be given the same priority attention by FEMA and the RAC as in previous reviews of the plan. We have expressed our sense of urgency in discussions with members of your staff on July 3 and 5, 1984, regarding the need for the plan review to be completed prior to the conclusion of the current hearing on emergency preparedness. Accordingly, we request that FEMA inform us by July 15, 1984, of the date by which FEMA findings on Revision 4 of the LILCO plan can be provided.

  
Edward L. Jordan, Director  
Division of Emergency Preparedness  
and Engineering Response  
Office of Inspection and Enforcement

Enclosures:

1. Ltr. fm. LILCO to Denton } not enclosed with fax  
dtd. 6/29/84
2. Ltr. fm. LILCO counsel to  
ASLB dtd. 7/2/84

cc: See Attached

CONTACT: F. Kantor, IE

JUL 9 1984

cc: S. A. Schwartz, IE  
C. R. Van Niel, IE  
J. N. Grace, IE  
F. Kantor, IE  
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# Federal Emergency Management Agency

Washington, D.C. 20472

JUL 11 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: Federal Emergency Management Agency (FEMA) Review of the  
Long Island Lighting Company (LILCO) Transition Plan for  
Shoreham In Support of the Nuclear Regulatory Commission  
(NRC) Licensing

This is in response to your memorandum of July 9, 1984, invoking the terms of the November 1980 NRC/FEMA Memorandum of Understanding and requesting that FEMA conduct a full Regional Assistance Committee (RAC) review of Revision IV of the LILCO Transition Plan. Revision IV responds to the FEMA finding transmitted to NRC on March 15, 1984.

FEMA intends to give the review of Revision IV of the Transition Plan the same priority treatment that has been accorded to previous reviews of the plan. However, we do not believe we can furnish the finding before November 15, 1984. Among the reasons for the required review time are other Shoreham-related obligations, set by NRC's Atomic Safety and Licensing Board (ASLB), which will place demands on the time of FEMA Region II staff (including the RAC Chairman) who would be involved in the review of Revision IV. FEMA witnesses are scheduled to testify on August 6, 1984 on contentions relating to public education and training. Before that date, extensive preparation must be done. Depositions may also occur on this material.

In addition to demands connected with Shoreham testimony, FEMA Region II has a substantial workload associated with operating nuclear reactors, notably Indian Point. Before the Fall 1984 exercise, the Rockland County Plan must be reviewed by the full RAC for the first time. Plan revisions for the other 3 counties must also be reviewed. Also, careful attention must be given to the review of the exercise scenario and objectives. This Indian Point exercise is especially important because (1) it is the first full-scale exercise since the ASLB issued its report in October 1983; (2) it is the first full-scale exercise since the June 1983 Commission ruling not to shut down the plant; and (3) it is the first full-scale exercise in which Rockland County will fully participate. It has already been delayed a few months to allow Rockland County to fully integrate itself into the planning and preparedness process. It cannot be delayed further. The same RAC members involved in this important effort are those who would have to work on the review of Revision IV of the LILCO Transition Plan.

In October 1984, a full-scale exercise will take place at the Salem site. The RAC work for this exercise has just begun. In addition, RAC plan reviews are in progress for the Oyster Creek, Salem, and Ginna sites. These are critical to Region II submittals relating to plan approvals under 44 CFR 350.

Finally, the RAC members have other commitments within their own agencies and could not devote 100% of their time to Shoreham, even if they did not have these important duties associated with the operating nuclear reactors.

As you know, work on Region II sites has already been delayed in the past, due to the time-intensive demands stemming from both the Indian Point and Shoreham cases. Any further compression of the review timetable for the LILCO Plan, Revision IV, would cause additional delays which would seriously impact the public health and safety in the vicinity of the Region II operating nuclear reactors. We do not feel that a transfer of FEMA regional staff is a viable solution to this problem. Temporarily transferring staff from other FEMA Regions would only transfer the impact to other operating reactors. It would also be of little benefit unless the other RAC members could receive similar relief from their agencies. For these reasons, we believe that we cannot furnish a finding on Revision IV of the LILCO Transition Plan earlier than November 15, 1984.

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



# Federal Emergency Management Agency

Washington, D.C. 20472

12 JUL 1984

MEMORANDUM FOR: Frank Petrone  
Regional Director  
FEMA Region II (New York)

FROM: Samuel W. Spack  
Associate Director  
State and Local Programs  
and Support

SUBJECT: Review of Revision IV of the Long Island Lighting Company  
(LILCO) Transition Plan (Shoreham Nuclear Power Station)

The purpose of this memorandum is to request that your office perform a full RAC review of Revision IV of the LILCO Transition Plan utilizing the Regional Assistance Committee (RAC).

As you are aware, the Nuclear Regulatory Commission (NRC) invoked Section II.4 of the November 1, 1980, NRC/Federal Emergency Management Agency (FEMA) Memorandum of Understanding (MOU) on June 1, 1983, by requesting FEMA to provide findings and determinations by June 17, 1983, for five different plans prepared by LILCO. This request was later modified to pertain to the LILCO Transition Plan and its three revisions. On June 10, 1984, FEMA received a request from NRC, copy attached, to conduct a full RAC review of Revision IV of the LILCO Transition Plan. Revision IV responds to the FEMA finding transmitted to NRC on March 15, 1984. It is our understanding, based on information from your staff, that copies of Revision IV have already been delivered to the FEMA Region II Office and RAC members.

Based on recent conversations between Mr. Robert S. Wilkerson of my staff and Mr. Philip McIntire of your staff, we will inform NRC that FEMA can provide a finding by November 15, 1984. In order that we may comply with this delivery date, it is also our understanding that FEMA Region II will furnish Headquarters with the results of the RAC review by October 16, 1984.

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

Attachment  
As Stated



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CONTENTION 16

Q.17A 16.E-Does the LILCO public education brochure adequately discuss the health effects of radiation exposure that the public might receive in the event of a severe accident at the SNPS?

A. The public information brochure does contain educational information on radiation as required by NUREG-0654, Planning Standard, G.1. However, this brochure does not address the magnitude of doses that the public might receive during a severe accident and the health consequences related to such releases. Although, as stated above, there is no NUREG-0654 requirement for this type of information, its inclusion would be informative to the reader.

A review of the Spring 1984 issue of LILCO's newsletter, "Keeping Current", revealed that information on health effects related to potential doses resulting from a severe accident are discussed.

It should be noted that in the process of reviewing the public education brochure, the FEMA witness panel identified other concerns which are not part of this contention.

CONTENTION 18

Q17B. 18-Has the FEMA witness panel reviewed the LILCO public information posters, telephone book inserts and Emergency Broadcast System (EBS) messages?

A. The only information available for review is the EBS messages.

Q17C. 18-Do the EBS messages contain a description of the emergency planning zones and the recommended evacuation routes for each zone?

A. The EBS messages contained in Procedures OPIP 3.8.2 provide for the insertion of narrative descriptions of each zone that may be affected by an evacuation (see attachment 4 of Procedure OPIP 3.8.2). The EBS messages do not contain provisions for the insertion of narrative descriptions of the evacuation routes described in the public information brochure. However, the text of the messages state:

To evacuate follow blue and white evacuation route signs posted on every major road. You will be directed along evacuation routes by trained traffic guides who know which way you should go.

Q17D. 18-Are there provisions in the EBS messages to accomodate persons who may be visiting an emergency planning zone within the 10-mile EPZ in which they do not reside, and are there provisions to inform such individuals of the proper evacuation routes?

A. As stated above in the answer to Question 17C, both EBS messages that deal with evacuation recommendations contain instructions for evacuees to follow blue and white evacuation route signs and the direction of trained evacuation guides. In addition, these EBS messages contain the following instructions for parents of school children:

Parents should not drive to school to meet their children since children are being safely transported outside the zone to relocation centers. Parents should not go to relocation centers until advised to do so.