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TRAINING CONTENTIONS

Q.121. In the preparation of the testimony that follows on the above contentions, what material was reviewed by the witnesses?

A. In addition to the LILCO Transition Plan, Revision 3, training modules 1,2,3,4,5,7,8,9,10,11,12,14,16,17,18 and 19 which included 11 video tapes and 12 scripts that were made available to FEMA; also a spot check of some training logs and workbooks was conducted at LILCO's Hicksville Office on July 24, 1984.

CONTENTION 39

Q.122. 39.A-Does the LILCO Transition Plan adequately provide for training of LILCO personnel so that trained replacements will be available to account for personnel lost via attrition?

A. The RAC evaluated NUREG 0654 element 0.1 as adequate. The plan states that in addition to the ongoing regularly scheduled training, special accelerated training will be initiated to maintain staffing of key positions.

The LILCO training program utilizes the concept of overstaffing to insure the availability of adequate numbers of response personnel. According to their records LILCO has trained, or is completing the training of, approximately 50% excess staff. There is a tracking system whereby the numbers of fully trained individuals for each job function is maintained.

Q.123. 39.B-Does the LILCO Transition Plan adequately provide for training of non-LILCO support organization personnel including provisions to account for attrition within these organizations?

A. The LILCO Transition Plan adequately provides for training of non-LILCO support organization personnel. The plan designates the Coast Guard and ambulance personnel as examples of such

organizations but does not limit training to these organizations. In fact, as stated in the plan, LILCO suggests that the American Red Cross should participate in LERO training. Other organizations which are included in the plan as organizations which have to take action but are not support organizations, will be offered annual training.

Non-LILCO support organizations, which have indicated their willingness to provide specific response by signing letters of agreement, accept the responsibility for informing LILCO of their training needs.

CONTENTION 40

Q.124. 40-Does the training program described in the LILCO Transition Plan adequately prepare LILCO employees for their respective emergency functions as well as make provisions for maintaining this capability?

A. The training program described in the LILCO Transition Plan is designed to provide adequate training to LILCO personnel. The training program provides for classroom training, drills, table top exercise and full scale exercises. The LILCO Transition Plan contains a matrix of drills and exercises to be conducted. There is a tracking system whereby the numbers of fully trained individuals for each job function is maintained.

The ability of specific individuals to perform any particular job function during a real emergency cannot be evaluated. However, the specific duties of emergency response personnel are not in most cases complex nor do they require a job related experiences. Experiences in other types of emergencies have shown that emergency workers have performed their roles well in all types of emergency situations where stress and fatigue are involved.

CONTENTION 41

Q.125. 41-Does the LILCO Transition Plan provide for adequate training in the use of communications equipment for emergency personnel?

A. The LILCO Transition Plan provides for adequate training of emergency personnel in the use of communications equipment. The plan provides a listing of the radio system functions which are to be tested quarterly, and provides for a mechanism whereby problems are to be resolved by the Emergency Planning Coordinator. This portion of the procedure calls for radio system checks between the EOC (the communicators) and various field locations. It is our conclusion that the field locations to be involved in these tests must be staffed if this procedure is to be completed. It is our understanding that these quarterly communications drills have not been completed.

CONTENTION 44

Q.126. 44.D-Does the LILCO Transition Plan adequately provide for the testing of the understanding of the message content by recipients at the Federal and State response organizations?

A. The LILCO Transition Plan does not specifically address this issue. However, the Radiological Emergency Data Form which is used to transmit emergency information is a general form and is used by other reactor sites within New York State. It is our belief that the Federal Agencies and New York State, if they choose to receive such messages, will understand the content since in exercises for other sites this form has been successfully used. Connecticut, the other State involved in the ingestion pathway EPZ, is also involved with radiological emergency planning for other sites and has demonstrated the ability to comprehend such information.

Q.127. 44.E-Does the LILCO Transition Plan adequately address "free play for decision making"?

A. The RAC review of the LILCO Transition Plan found NUREG element N.3 to be adequate. The plan provides that scenarios for drills and exercises would allow for participant discretion and decision making. The exact details of how this "free play" would be accomplished depends on the specific objective(s) of a particular drill

or exercise. In the case of a Federally evaluated exercise, the offsite objectives of such an exercise must be reviewed and approved by FEMA.

Q.128. 44.F-Does the LILCO Transition Plan adequately provide for evaluation and critiques of the annual exercise?

A. The RAC review of the LILCO Transition Plan found NUREG 0654 elements N.4 and N.5 to be adequate. The plan correctly states that the comments from the FEMA Post Exercise Assessment Report will be available for use in revising the plan. However, changes to revision 3 of the plan are required to maintain consistency (see RAC review pages 54 and 55). It should be noted that the FEMA requirement is for biennial Federally evaluated exercises not annually as was required in the past. There are also FEMA provisions for Federally evaluated remedial exercises to insure that serious deficiencies have been corrected. In addition to the FEMA evaluations any participating organization may prepare an exercise evaluation.

CONTENTION 98

Q.129. 98-Does the LILCO Transition Plan adequately provide for initial training and periodic retraining of emergency organizations which will be required to "take actions during an incident"?

A. According to their records, LILCO has completed training of the Coast Guard and four of eleven ambulance companies. According to LILCO personnel, contact has been made with schools, hospitals, and nursing homes to arrange for training in accordance with the plan provisions. According to LILCO personnel the training for the Wading River School District is planned for the fall of 1984, when the full staff will be available. Also, see answer to Contention 39 B.

CONTENTION 99

Q.130. 99.C-Does the LILCO Transition Plan provide for adequate training of LILCO personnel by qualified instructors?

A. The LILCO Transition Plan does not address the qualifications of the training instructors. Proof of the quality of instruction, or lack thereof, is the ability of emergency response personnel to perform their job functions. This ability is traditionally evaluated in a Federally observed exercise.

Q.131. 99.G-Does the LILCO training program provide adequate information on how to perform various job functions?

A. The LILCO Transition Plan and the training program for LERO emergency response organizations contain adequate information for personnel to be able to carry out their emergency functions. The knowledge and effectiveness of emergency workers to perform their jobs, based on their familiarity with these materials, would be evaluated at a Federally observed exercise.

CONTENTION 100

Q.132. 100.B-Does the LILCO training program make adequate provisions for observing, evaluating and critiqueing drills and exercise?

A. The plan defines drills as ..."supervised instructional periods ...". The plan lists drills which will be held as a part of the overall training program. In addition to the drills specifically required by NUREG 0654, provisions for additonal drills are included in the plan. The plan specifies that drills are evaluated by designated observers. We believe that the objective of these drill evaluations will be in accord with the supervised instructional purpose of the drills as stated in the plan. The observation and evaluation of exercise is discussed in the answer to Contention 44.F.

Q.133. 100.D-Does the LILCO Training program adequately provide emergency personnel the opportunity to perform their job function?

A. The LILCO Transition Plan makes provisions for drills wherein the participants will utilize the facilities, equipment and procedures to respond to the simulated incident.

Q.134. 100.G-Does the LILCO Training program contain adequate provisions for evaluating the performance of individual emergency response personnel?

A. The LILCO Transition Plan is not specific with regard to the performance standards by which the adequacy of training would be evaluated. A Federally evaluated exercise includes objectives which constitute a type of performance standard. The FEMA evaluation is based upon specific exercise objectives which are keyed to NUREG 0654 planning standards. The FEMA Post Exercise Assessment would indicate if the exercise objectives were met. If the training of response personnel is evaluated as being deficient, there are provisions within the FEMA rules requiring remedial exercises to demonstrate correction of problem areas.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

DOCKETED
USNRC

BEFORE THE ATOMIC SAFETY AND LICENSING APPEAL BOARD

'84 AGO 10 AIO:56

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 Training Contentions 39, 40, 41, 44, 98, 99 and 100 has been served on the following by deposit in the United States mail, first class or where indicated by an asterisk by Telecopier this 6th day of August 1984.

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