



Federal Emergency Management Agency

Washington, D.C. 20472

APR - 9 1985

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: Supplemental Interim Finding on Offsite Radiological
Emergency Preparedness for the Limerick Generating
Station

Attached is a copy of the Supplemental Interim Finding on Offsite Radiological Emergency Preparedness for the Limerick Generating Station. As stated in my memorandum to you of January 23, 1985, the Region III staff of the Federal Emergency Management Agency (FEMA) reviewed the revised plans which were submitted to us under the Memorandum of Understanding between our respective offices. Also attached is an addendum to the Regional Assistance Committee's (RAC) review.

This interim finding supplements the "FEMA and RAC, Region III Informal Evaluation of the Offsite Radiological Emergency Response Plans for the Limerick Generating Station" which was transmitted to you on May 8, 1984. This report is also an element-by-element review against Section II, Planning Standards and Evaluation Criteria, NUREG-0654/FEMA-REP-1, Rev.1.

The remaining plan deficiencies which are expected to be addressed at the April 10, 1985, remedial exercise are:

1. Testing of evacuation plans for the school districts;
2. Participation by South Coventry Township, with Chester County performing compensatory responsibilities;

The remaining plan and preparedness deficiencies which will not be addressed at the April 10, 1985, remedial are:

1. The 24-hour emergency response capability in South Coventry Township which will remain deficient due to staffing problems;

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2. Unmet needs regarding buses and ambulances. Chester County requires 132 buses and 80 ambulances; and Montgomery County requires 12 buses and 82 ambulances;
3. The process for establishing access control points remains incomplete; and
4. Testing of the alert and notification process as well as the Berks County Emergency Broadcast System capability.

The Regional staff is working with the State to expedite a solution to these remaining deficiencies.

Based on the review of the revised plans and the results of the July 25, 1984, full-scale offsite radiological emergency preparedness exercise and the supplemental exercise conducted on November 20, 1984, the overall radiological emergency plans and preparedness are not adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public in the vicinity of the Limerick Generating Station in the event of a radiological emergency.

Attachment
As Stated



Federal Emergency Management Agency

Region III 105 South 7th Street Philadelphia, Pennsylvania 19106

MAR 29 1985

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

ATTENTION: Gloria Joyner

FROM: *Paul P. Giordano*
Paul P. Giordano
Regional Director

SUBJECT: Updated Interim Findings on Offsite Radiological
Emergency Preparedness for the Limerick Generating
Station

Attached you will find a copy of FEMA Region III's updated Interim Findings on Offsite Radiological Emergency Preparedness for the Limerick Generating Station. The report consists of an element-by-element review of the plans utilizing NUREG 0654/FEMA-REP-1, Revision 1 and was contributed to by the various federal agencies that make up the Regional Assistance Committee. These updated interim findings are a supplement to the "Federal Emergency Management Agency and Regional Assistance Committee, Region III, Informal Evaluation of the Offsite Radiological Emergency Response Plans Site-Specific to the Limerick Generating Station, dated April 27, 1984." It was that document which resulted in the original interim findings, sent to FEMA Headquarters on April 17, 1984. As you are aware, because of four (4) "Category A" deficiencies identified as part of the original Interim Findings, this office found that the local emergency response plans were inadequate and were not capable of being implemented. The full-participation exercise held on July 25, 1984 revealed five "Category A" deficiencies, three of which were confirmations of deficiencies noted as part of the planning review.

This memorandum will serve to summarize the status of previously identified "Category A" deficiencies and update the overall status of offsite planning and preparedness site-specific to the Limerick Generating Station. Besides the updated Interim Findings, we have also enclosed an addendum of general comments received by the RAC too late to be incorporated into the main document, but including items the Region felt would be of use to the offsite authorities as part of their process to upgrade the various plans.

"Category A" deficiencies identified as part of the April 17, 1984 Interim Findings:

1. In one (1) community (South Coventry Township, Chester County), twenty-four hour emergency response continues to remain a problem due to the fact that many essential positions are vacant. A "Category A" deficiency remains for this community.

2. Progress has been made in dealing with mobility-impaired/transit dependent individuals. A plan has been submitted for the Pennsylvania Department of Corrections (including the State Correction Institution, Graterford) and was exercised in an adequate manner on March 7, 1985. Lists have been compiled for individuals with special medical requirements and those persons requiring transportation assistance and put on file in the municipalities. The risk counties have identified the necessary resources to evacuate those individuals located within ten miles of Limerick and reported their unmet needs to the Pennsylvania Emergency Management Agency. Obtaining resources to fulfill those unmet needs is an ongoing concern. Chester County requires 132 buses and 80 ambulances while Montgomery County requires 12 coach buses and 82 ambulances (these figures do not count an emergency reserve established by Montgomery County which result in additional unmet needs of 39 buses, 10 minibuses, 7 coach buses and 40 ambulances). PEMA is currently working with other state agencies to address these needs. A "Category A" deficiency remains due to an outstanding need for evacuation transportation resources.
3. Potassium iodide has been obtained in adequate numbers. PEMA has provided the Region with a purchase order verifying that 9,000 low-range, self-reading dosimeters have been ordered, with delivery expected to begin the week of March 31. Thermoluminescent dosimeters are also in the process of being obtained. PEMA has provided assurance to the Region that dosimetry is available in adequate numbers at other sites in Pennsylvania that could be transferred to the Limerick area in a prompt manner in the event of an emergency. For all of the above stated reasons, FEMA, Region III feels that a "Category A" deficiency is no longer warranted.
4. The concerns regarding traffic control points have been resolved by the information contained in the current plans. Access control points continue to present a problem. As many as 39 ACPs will not be manned. Efforts are underway between the consultants, the counties, PEMA and other State agencies to find personnel for these points. Failing that, arrangements will have to be made to establish barricades at designated locations. The process for establishing access control points remains incomplete; thus the "Category A" deficiency must continue in effect.

"Category A" deficiencies identified as part of the September 19, 1984 Exercise Evaluation Report on the July 25, 1984 Limerick Generating Station Exercise:

1. See comment 1 above. "Category A" outstanding.
2. As noted in comment 2 above, the Pennsylvania Department of Corrections and the State Correctional Institution, Graterford, adequately displayed their capabilities to respond to an accident at Limerick. According to PEMA, school districts are expected to display their capabilities as part of a remedial exercise scheduled for April 10, 1985. "Category A" outstanding.

3. See comment 3 above, "Category A" resolved.
4. According to PEMA, the alert and notification concerns raised in the September 19 report will be addressed as part of the April 10 remedial exercise. "Category A" outstanding.
5. All municipalities within the plume EPZ have displayed adequate capabilities to respond to an emergency at Limerick either as part of the July 25, 1984 exercise or the November 20, 1984 supplemental exercise, with the exception of South Coventry Township, Chester County. "Category A" outstanding.

Any outstanding "Category B" deficiencies are expected to be resolved through the planning and/or exercise process.

STATEMENT OF FINDINGS: It is evident that great progress has been made over the last year in upgrading the offsite radiological emergency response plans and preparedness in the event of an incident at the Limerick Generating Station. This is due to the time and effort put into this project by individuals at all levels of government - State, county, municipal, school district, many of whom are volunteers, along with the assistance provided by the utility's consultant. However, three "Category A" deficiencies remain from a planning standpoint and thus the Region cannot make a positive statement that the plans are adequate and capable of being implemented. Exercises conducted to date have shown that participating jurisdictions could adequately respond to an accident at Limerick. Due to the fact that school districts and one municipality have not yet demonstrated their capabilities and alert and notification issues remain unresolved, the Region cannot state that overall offsite emergency preparedness is adequate to provide reasonable assurance that appropriate measures can be taken to protect the health and safety of the public living in the vicinity of the Limerick Generating Station in the event of a radiological emergency.