



Federal Emergency Management Agency

Washington, D.C. 20472

MAY 1 1985

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

50-277
50-278

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

SUBJECT: Schedule of Corrective Actions for the Peach Bottom Offsite
Radiological Emergency Preparedness Exercise

Attached is a copy of the schedule of corrective actions for Category B deficiencies cited at the Peach Bottom full-participation Offsite Radiological Emergency Preparedness Exercise conducted on October 17, 1984. The corrective actions have been submitted by the State of Maryland and the Commonwealth of Pennsylvania.

The two Category A deficiencies in Pennsylvania, one affecting Drumore and Little Britain Township, Lancaster County; and one affecting the Fawn Grove Borough/Fawn Township Joint Emergency Operations Center, York County, have been addressed at a remedial exercise on April 10, 1985.

As soon as the remedial exercise and the results have been reviewed and analyzed, this information will be forwarded to you along with a supplemental statement on the adequacy of offsite preparedness.

If you have any questions, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division, at 646-2860.

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Federal Emergency Management Agency

Region III 105 South 7th Street Philadelphia, Pennsylvania 19106

MAR 5 1985

Mr. John L. Patten
Director
Pennsylvania Emergency Management Agency
Transportation and Safety Building, B-151
Harrisburg, Pennsylvania 17120

Dear Mr. Patten:

This letter is in response to your February 20, 1985 letter transmitting PEMA's response to the October 17, 1984 Peach Bottom exercise report. Following are our comments on the corrective actions proposed.

Category "A" Deficiencies

The assertion that Lancaster County was never informed that lack of federal observation would result in Category "A" deficiencies is irrelevant. Federal observation is an inherent element of REP exercises conducted under CFR 350.9. (Note: The preceding is stated in awareness of that element of PEMA's position paper transmitted under your January 29, 1985 letter requesting FEMA concurrence on PEMA evaluation of municipalities. Without reference to FEMA's eventual response to that position paper, FEMA is now, and was on October 17, 1984, responsible for evaluation of municipalities participating in exercises.) Therefore, FEMA is unable to accept PEMA's assurance that citizens of the municipalities will be protected in the event of a radiological emergency at Peach Bottom. We await information from PEMA on the date and scenario of a remedial exercise.

We also await a date and scenario for a Fawn Grove Borough/Fawn Grove Township Joint EOC remedial exercise. The term "tabletop" is used in reference to this exercise. Rather than taking a position on the appropriateness of this term for the York or Lancaster municipalities, we will evaluate scenarios, when submitted, to ascertain whether the Category "B" deficiencies assigned to Fawn Grove Borough/Fawn Grove Township will be addressed and whether the main elements of the Drumore and Little Britain Township plans will be exercised.

Category "B" Deficiencies

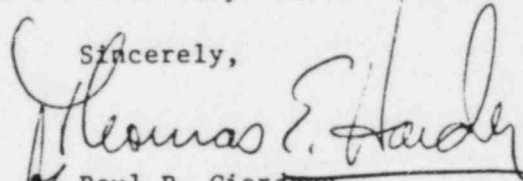
PEMA's response to deficiency #1 states that no reports of not receiving information within the EOC were received. We direct attention to the third paragraph of page 6 of the exercise report (a typographical error made two sentences out of what should have been one). The PIO office's missing of the declaration of General Emergency appeared to be due, at least in part, to problems with the public address system.

We find the responses to deficiencies #4 and #5 disappointing. Chester County participated in this exercise in order to allow West Nottingham Township to participate. Accordingly, FEMA would not be in a position to insist on corrective actions for any County deficiencies that might have been observed. In the interest of preparedness, however, we would assume that the State and the County would be most interested in correcting the problems noted. The information given under "Corrective Action" for these deficiencies gives the impression that the goal is to satisfy exercise requirements rather than to assure emergency preparedness.

We assume that the addition of staff members referred to in the response to deficiencies #10, #14, #26, #35 and #36 will be reflected in the respective municipal plans submitted for 350 approval. Similarly, responses to deficiencies #19, #21, #22, #23, #24, #25, #28, #29, #30, #32 and #33 should be reflected in revised plans.

A copy of this letter will be forwarded to FEMA Headquarters along with the corrective actions of Maryland and Pennsylvania. In the meantime we will await scheduling and scenarios for the necessary remedial exercises.

Sincerely,


Paul P. Giordano
Regional Director



PENNSYLVANIA EMERGENCY MANAGEMENT AGENCY
P.O. BOX 3321
HARRISBURG, PENNSYLVANIA 17105-3321



February 20, 1985

Mr. Paul P. Giordano
Director
Federal Emergency Management Agency
Region III
Curtis Building, 7th Floor
6th & Walnut Streets
Philadelphia, Pennsylvania 19106

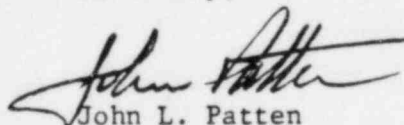
Dear Mr. Giordano:

The response of the Pennsylvania Emergency Management Agency (PEMA) to the evaluation report of the Peach Bottom Atomic Power Station on October 17, 1984 is attached.

Where remedial exercises are necessary, our plan is to complete all exercises not later than April 1, 1985.

Please contact me if you have any questions concerning our response.

Sincerely,


John L. Patten
Director

JLP:tjl (Tel: 717-783-8150)

Attachment

SUMMARY OF DEFICIENCIES

CATEGORY A. The following deficiencies indicate that offsite emergency preparedness was not adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of the public.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>Drumore Township & Little Britain Townships (Lancaster)</u>				
1. Because no federal observation was permitted, FEMA is unable to find that emergency preparedness was adequate to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of residents in the event of a radiological emergency at Peach Bottom Atomic Power Station.	J.9	Lancaster County was never informed, officially or otherwise, that lack of federal observer would result in Category "A" deficiencies. Drumore & Little Britain Townships fully participated in the exercise and performed as well, if not better than the other 5 municipalities within the 10-mile EPZ. It is strongly recommended that FEMA accept the observations made by PEMA as reasonable assurance that the citizens of the municipalities will be protected in the event of a radiological emergency at Peach Bottom. Rest assured, <u>all</u> municipalities will consent to federal evaluation in future drills.	Prior to April 1, 1985	
<u>Fawn Grove Borough/Fawn Township Joint EOC (York County)</u>				
2. Fawn Grove Borough/Fawn Township did not demonstrate an overall level of emergency preparedness sufficient to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of Borough and Township residents.	J.9	Additional personnel, training and a change in EOC location will improve the overall level of emergency preparedness for this municipality. Additional training sessions will be held with the EOC staff and a tabletop exercise will test and evaluate their capability to provide reasonable assurance that appropriate protective measures can be taken to protect the health and safety of Borough and Township residents.	Prior to April 1, 1985	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>Pennsylvania</u>				
1. Internal communications in EOC suffered because of technical problems with the public address system.	H.3.	Public address system announcements are habitually followed by a coordination visit to concerned response team personnel to ensure receipt of the announcement. No reports of not receiving information were received. PA system is in use daily; vocal testing will be conducted weekly.	October 1984	October 1984
2. PEMA accepted dose rates from BRP in unintelligible form (without units and with incorrect exponential format) and relayed them to the counties in such form. The PEMA Operations Chief took note of this mistake and attempted to acquire intelligible information from BRP but not until after the misinformation had been relayed to the counties.	E.5. G.4.b.	Verification and clarification of messages from BRP will be executed in a timely manner. BRP also indicates that more care will be taken during future exercises when giving dose rates to PEMA.	May 1, 1985	
3. Periodic updates of plant conditions and meteorology were not made available to BRP on a regular basis, nor was BRP sufficiently aggressive in acquiring this information for relay to PEMA.	H.12.	Personnel will be more aggressive in acquiring updates of plant conditions and meteorology during future exercises.	May 1, 1985	
<u>Chester</u>				
4. The designated EBS station could not be received at the County EOC nor is the station operational 24 hours per day.	E.5.	Chester County was granted permission to participate in this exercise on a limited basis. Chester County was tested and evaluated as full participants during the Limerick Exercise, July 25, 1984.	Full Participation will be demonstrated during Peach Bottom Exercise, October 16, 1986	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
5. No permanent record devices (film badges or TLD's) are in existence for emergency workers in Chester County. Attempts should be made to procure this equipment.	K.3.a.	Same as number 4.		
6. Although the reception and mass care center staff gave every indication of being prepared to perform their emergency functions, they did not so fully demonstrate. At the next exercise a fuller demonstration of plan implementation should be conducted.	J.10.h.	Same as number 4.		
<u>West Nottingham Township</u> 7. Some of the phone numbers on the Township's call lists were not correct. These lists should be regularly checked for accuracy.	F.1.e.	Call lists shall be periodically updated to insure that personnel and phone numbers are correct.	October 1984	October 1984
<u>Lancaster County</u> 8. Monitoring and decontamination equipment should be protected with a plastic cover where appropriate to prevent possible contamination.	K.5.	Plastic "baggies" are on-hand and will be utilized to cover the decontamination equipment.	October 1984	October 1984
9. A system/plan should be developed for disposal of contaminated water and clothing.	K.5.	Following EPA guidelines, low level contaminated water from decontamination points will be allowed into sewage systems and/or leach into the ground. Clothing will be collected in plastic bags and laundered, again allowing low level contaminated water to flow freely into sewage systems.	October 1984	October 1984
<u>East Drumore Township</u> 10. The Township does not have the capability for 24 hour operations. Staffing for the exercise was incomplete; participants played dual roles.	A.1.e.	Additional staff members have been recruited and 24 hour operation is now feasible.	February 1985	February 1985

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
11. Staff did not demonstrate complete familiarity with many aspects of the plan. Additional training is necessary.	A.1.e. O.	The plan had recently been revised and additional training is in process to ensure familiarity with the plan.	February 1985	February 1985
12. The Township did not request resources from the County EMC for unmet needs. The Township EMC stated that the County was aware of what the Township's resource shortages were. Unmet needs should be explicitly made known to the County at the appropriate time.	A.4.	Training will correct this deficiency. The Township had previously advised of unmet needs. Assuming the county was aware, did not identify again during the exercise. This deficiency will be corrected by more aggressive pursuit of unmet needs during future exercises.	February 1985	February 1985
<u>Fulton Township</u>				
13. The Township did not exercise staffing requirements as per its plan. An official not so designated acted as EMC. The designated EMC made no attempt to prepare the Operations Room for readiness and was not available to serve as a key staff member. The Deputy EMC went to another facility and performed the sole function of route alerting.	A.1.e.	The emergency management staff of Fulton Township will undergo extensive training in an attempt to attain an acceptable level of readiness. The county will work closely with the Township EMC and elected officials to ensure a satisfactory level of performance in the immediate future.	September 1985	September 1985
14. No 24 hour manning capability was demonstrated.	A.1.e. H.4.	Same as number 13.		
15. The Township never requested unmet needs, especially the need for a RACMS radio and operation, from the County.	A.1.e.	Same as number 13.		
16. Additional training and familiarity with the Township plan to include responsibilities and communications systems available and use of those systems is needed for the EOC staff.	O.	Same as number 13.		

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
<u>Providence Township</u>				
17. The RACES operator could not handle all messages to the EOC. Procedures and equipment should be reviewed and modified as needed.	F.1.b.	Additional training for the entire EOC staff will result in better utilization of not only RACES, but all forms of communication.	September 1985	
18. The Radiological Officer was not knowledgeable about responsibilities and did not arrive at the EOC until 1900 when the evacuation was already underway. He should receive additional training.	K.	Training is now programmed on a continual basis to keep radiological monitoring personnel and teams at peak proficiency.	September 1985	
<u>York County</u>				
19. The design of the decontamination center at Airville should be reevaluated and revised as necessary to prevent possible contamination of center and EOC staff.	K.5.	New centers have been established outside the EPZ for emergency workers. The new centers have showers and can house ambulances.	February 1985	February 1985
20. Supplemental training should be provided to monitors to ensure full understanding of contamination prevention procedures.	O.4.c.	Training has been scheduled to begin early in March, 1985.	March 1985	
<u>Delta Borough/Delta Township Joint EOC</u>				
21. Clarification is needed with regard to the timing of the dispatching of route alert teams. Also, it is recommended that a standard message content for use by the route alert teams be developed and incorporated into the plans.	E.5.,6.	The municipalities' RERP are being amended and items such as EOC relocation outside the EPZ, route alerting, and instructions to farmers are being incorporated. The county plan details how and when KI will be distributed to the local EOCs. Training sessions have begun.	September 1985	
22. Procedures for the provision of protective action instructions to farmers, should be reviewed, in coordination with the York County RERP, and the municipal plans revised as appropriate.	J.9.	Same as number 21.	September 1985	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
23. The EMC should confer with the County in order to establish an appropriate location outside of the 10 mile EPZ for the relocation of evacuated EOC personnel.	H.3. A.1.e.	Same as number 21.	September 1985	
24. Clarification and training is needed with regard to the procedures for obtaining KI in the two municipalities.	A.2.a.	Same as number 21.	September 1985	
<u>Fawn Grove Borough/Fawn Grove Township</u>				
25. Future exercises should demonstrate staffing of the EOC to include active involvement by elected officials during critical periods of activity and greater control and direction of emergency response activities demonstrated by the EMC.	A.2.a.	Arrangements have been made to change the EOC from its present location to the fire hall and move the decontamination station from the fire hall to a location in Stewartstown, which is outside the EPZ. EOC staffing problems have been addressed and more personnel have been acquired. Additional training is being done and a table top exercise is scheduled prior to April 1, 1985. In conjunction with the moving of the EOC, the internal layout will be configured to facilitate an improvement in communications. Arrangements are being finalized to provide an alternate EOC if evacuation is required. (Located outside the EPZ.)	Prior to April 1, 1985	
26. Twenty-four hour staffing of all EOC positions should be established, and the RERP updated accordingly.	A.1.e. A.2.a.	Same as number 25.	Prior to April 1, 1985	
27. Additional training should be provided to response personnel with regard to the provisions of the RERP, especially concerning evacuation and relocation of EOC activities and use of KI.	H.3. A.1.e.	Same as number 25.	Prior to April 1, 1985	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
28. The communications systems used at the EOC should be critically reviewed and reorganized. The revised system should enable timely notification to the EMC and EOC staff regarding changes in plant status and protective action recommendations. Specifically, RACES network operations, and training with regard to the recently provided scanner should be provided.	F.1.a.	Same as number 25.	Prior to April 1, 1985	
29. The Borough and Township's plan for the utilization of route alerting is unclear; route alerting was conducted at inappropriate times. Clarification is needed with regard to the timing of the dispatching of route alerting teams. Initiating route alerting with the sounding of Maryland's sirens is not indicated in the RERP, and could cause coordination difficulties with Pennsylvania EBS announcements. Responsibility for completing route alerting in Maryland (as alluded to by the Fire personnel) should be clarified and incorporated in the RERP, if appropriate.	E.5. E.6.	Same as number 25.	Prior to April 1, 1985.	
30. Route alerting took an excessive amount of time. Route alert sectors should be reviewed and restructured as necessary in order to provide for a more timely completion of routes.	E.5. E.6.	Same as number 25.	Prior to April 1, 1985	
31. Lists of mobility-impaired individuals should be developed and maintained at the EOC.	J.10.d.	Same as number 25.	Prior to April 1, 1985	
32. The RERP should be revised to reference all mutual support agreements.	A.3.	Same as number 25.	Prior to April 1, 1985	

SUMMARY OF DEFICIENCIES

CATEGORY B. The following deficiencies, while not indicative of preparedness insufficient to provide the assurance specified in Category A, above, require corrective action. Also included are recommendations where performance was adequate, but correctable weaknesses were noted.

DEFICIENCY/RECOMMENDATION	REFERENCE NUREG-0654 PART II	CORRECTIVE ACTION	PROJ'D DATE	ACT'L DATE
33. The Borough/Township EMC should confer with the County in order to establish an appropriate location outside of the 10 mile EPZ for the monitoring and decontamination of Delta Borough evacuated emergency workers.	H.3. A.1.e.	Same as number 25.	Prior to April 1, 1985	
34. The EMC should investigate the cause for the apparent lack of notification to administer KI, and ensure the completion of corrective actions as necessary.	F.1.d. F.1.e.	Same as number 25.	Prior to April 1, 1985	
<u>Lower Chanceford Township</u>				
35. Future exercise should demonstrate full staffing of the EOC.	A.2.a.	The RERP is being written to reflect additional staffing. The EOC staff has been advised of participation requirements.	September 1985	
36. Twenty-four hour staffing should be established and incorporated into the municipal RERP.	A.1.e.	Twenty-four hour staffing is being included in the RERP.	September 1985	
37. Future exercises should exhibit the simulation of demonstration of activities associated with the relocation of EOC operations.	H.3. A.1.e.	A new EOC location has been identified outside the EPZ if evacuation is required.	October 1986	



DEPARTMENT OF
PUBLIC SAFETY AND CORRECTIONAL SERVICES

HARRY HUGHES
GOVERNOR
FRANK A. HALL
SECRETARY
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EDWARD MURRAY
DIRECTOR OF EMERGENCY MANAGEMENT
AND CIVIL DEFENSE AGENCY

February 15, 1985

Mr. Paul P. Giordano
Regional Director
Federal Emergency Management Agency
Region III
105 South 7th Street
Philadelphia, Pennsylvania 19106

ATTENTION: Mr. James Asher

Dear Mr. Giordano:

This correspondence represents the State of Maryland's response to the Federal Emergency Management Agency/Regional Assistance Committee evaluation report for the radiological emergency response exercise held in conjunction with the **Peach Bottom Atomic Power Station** on October 17, 1984. Included in this response is a schedule of proposed corrective actions for the deficiencies/recommendations cited. Please note that the response has been summarized to address several deficiencies and recommendations simultaneously due to the similarity of corrective measures. Our response is summed in four (4) categories and is keyed to summary of Category "B" deficiencies and recommendations in original report.

EQUIPMENT (recommendations 14 and 15)

The State of Maryland is requesting that Philadelphia Electric Company (PECo) install a dedicated radio system to serve as a backup to the direct phone lines between **Peach Bottom Atomic Power Station** and the Maryland State EOC. We have also requested of PECo and the Baltimore Gas and Electric Company (BG&E), several telecopiers to establish a reliable system for hard copy transmission of news releases.

The projected date for receipt of the telecopiers is June 1, 1985. In that installation of a backup radio communications system requires extensive evaluation and design, completion can be projected no sooner than October, 1986 provided the utility finds this a feasible request.

PLANS/PROCEDURES (deficiency 48 and recommendations 13 and 16)

A new map is being developed which will assist Harford County in identifying geographical areas affected during implementation of protective actions. Also, the State of Maryland is actively pursuing a standard format for notifications between neighboring states and the utilities. Consideration will be given to plan and procedure revision to prompt notification of Pennsylvania prior to siren activation in Maryland.

Projected dates for plan and procedures revisions are no later than October, 1985. The map should be completed by May 1, 1985.

TRAINING (deficiencies 42,44,45,47, and 48 and recommendation 20)

Tasks cited in the referenced deficiencies and recommendations will be given emphasis during annual training. Cecil County and the State of Maryland do not believe the confusion or inconsistencies cited in deficiencies 44 and 47 exists in the County plan. Rather, we believe the tasked authorities need some adjustment to the new plan.

Training is projected to occur throughout 1985 to address all noted deficiencies.

EXERCISE PARTICIPATION/CONDUCT (deficiencies 38,40,41,42, and 46 and recommendations 17,18, and 19)

The referenced deficiencies and recommendations under this heading are the result of player deviation from participation guidance outlined in the State of Maryland exercise directive. This directive is distributed prior to each REP exercise. In the future, the directive will emphasize full participation, to the extent possible, during full scale exercises.

Deficiency #42 has been addressed in this category, as it was determined to be a controller induced problem. Exercise control instructions, within the exercise directive, will emphasize coordination of control messages.

The next full scale Exercise with Peach Bottom Atomic Power Station is scheduled for October 16, 1986, thus the projected date for correction of these deficiencies/recommendations coincides with the exercise date.

Finally, we must challenge the accuracy and validity of deficiencies 39,41,43, and 49). Deficiency #39 indicates a misunderstanding of the Maryland plan for public information. According to Section 3.1.6.2 of the Maryland REP, the county public information officers (PIO) will report on the radiological emergency

situation and county operations (i.e. evacuation instructions). The State PIO will report on coordination of resources and state efforts in support of county operations.

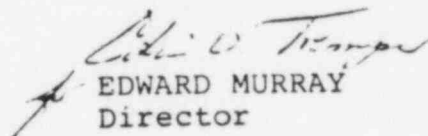
Deficiency #41 is a surprise to Cecil County, as the area's primary EBS station, WAMD, reported that every EBS station participated. None-the-less, this deficiency has been addressed under Exercise Participation/Conduct.

Deficiency #43 contradicts what is stated in deficiency #45, as access control is the responsibility of the State Police and the State Police simulated taking KI prior to authorization. Proper use of KI is addressed in annual training.

Deficiency #49 might be acceptable as a recommendation, but considering the total number of mobility-impaired people that Harford County has identified, it is excessive to plan to that degree (i.e. particular needs). This information would be necessary when dealing with hundreds of mobility-impaired people, but Harford County has approximately 35 mobility-impaired people to evacuate and more than enough ambulances and handicapped equipped buses to move them. Although we contest this deficiency, information on particular needs is being solicited through the new public information brochures for Harford County.

Should there be any questions or comments regarding our response or the contested deficiencies, please contact my Assistant Director for Operations, Mr. Edwin O. Tremper, at (301) 486-4422.

Sincerely,


EDWARD MURRAY
Director

EM:CLR:lw

Information Addressees: Mr. Daniel H. Mahan, Jr., Director
Cecil County Emergency Management and
Civil Defense Agency
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Services Coordination
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Attention: Mr. Timothy Brooks
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State Public Information Officer
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