



Federal Emergency Management Agency

Washington, D.C. 20472

50-440

MAY 23 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: Schedule of Corrective Actions for Deficiencies
Identified During the Perry Nuclear Power Plant (NPP)
Offsite Radiological Emergency Preparedness (REP)
Exercise Conducted on November 28, 1984

Attached is the revised schedule of corrective actions for the State of Ohio, and the Counties of Ashtabula, Geauga and Lake for the deficiencies cited in the Final Report for the Perry NPP Offsite REP Exercise conducted on November 28, 1984.

The initial schedule of corrective actions submitted by the State was sent to you on May 1, 1985. Several issues required further action by the State and Counties. The K.3.a/K.3.b deficiency (radiological exposure control for emergency workers) has been determined to be a deficiency for the State rather than Geauga County. This clarification and acceptance of responsibility by the State for the deficiency is reflected in the revised schedule of corrective actions. The revised schedule also includes the expected completion date for correcting each of the deficiencies.

The Federal Emergency Management Agency (FEMA) Headquarters and Region V staff have reviewed the revised schedule of corrective actions submitted by the State and found it to be adequate.

If you have any questions, please contact Mr. Robert S. Wilkerson, Chief, Technological Hazards Division, at 646-2861.

Attachment
As Stated

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File

STATE OF OHIO
ADJUTANT GENERAL'S DEPARTMENT
2825 WEST GRANVILLE ROAD
WORTHINGTON, OHIO 43085-2712

DISASTER SERVICES AGENCY

AGOH-DS

April 8, 1985

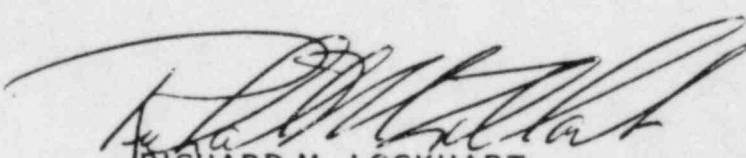
Mr. Wallace Weaver, Chairman
Regional Assistance Committee
Federal Emergency Management Agency
Region V
300 South Wacker Drive
Chicago, IL 60606

Dear Mr. Weaver:

Enclosed are the revised corrective actions that will be applied to the November 28, 1984 exercise deficiencies. The deficiency listed under Geauga County that concerns the Ohio Department of Transportation is in reality the responsibility of the Ohio Disaster Services Agency. Therefore, we have addressed that item under the Ohio corrective actions.

I regret not including a letter from the Ashtabula County Medical Center (ACMS), but under the current circumstances, I feel the issue of equipment availability at ACMC will be resolved during the April 9-16, 1985 hearings.

FOR THE DIRECTOR


RICHARD M. LOCKHART
Deputy Director

KBC:kjs

Encls: as stated

APR 12 1985

Rec'd 5/14

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions

April 4, 1985
(Date)

Ohio
(State)

Ohio
(Community)

NUREG
Item

Narrative Statement
of Deficiency

Corrective Action
Proposed

Scheduled
Date

A.4

Around the clock staffing capability at the EOF was not demonstrated as outlined in the State of Ohio Plan.

It was never the intent of the State to have more than one functioning representative at the EOF. Both the ODOH and ODSA representatives are fully trained to independently handle any duty as liaison. Each serves 2 shifts on and 1 shift off (16 hours on, 8 hours off) so that there is 24 hour coverage and periods of increased activity can have double staffing (8 hours per day can be double staffed). The text on page II-C-2 and II-C-10 (II-C-2-b-3 and II-C-3-c-1-b) address this criteria. The text on page II-I-5 (II-I-3-a-5) will be clarified in the next plan revision. Concerning the quantity of work to be performed, it should be noted that the amount of activity observed is due to the accelerated nature of an exercise. During a real event, all activities would take place over a longer period of time.

May 31, 1985

UTILITY: Perry Nuclear Power Plant
Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
E.7	Information contained in the EBS messages was not released at the JPIC.	All messages released through the EBS will be provided to the JPIC for distribution to the media.	May 31, 1985
F.1.b.	The five-way telephone link proved unreliable during the exercise.	The five-way dedicated line was installed in segments during the weeks and days prior to the exercise, and was tested fully only a few times. Its failure during the exercise involved two connectors and remedial action was prompt. Since the exercise, the telephone company has spent considerable time "debugging" and testing the line. There were three separate tests of the entire system including one which involved activating the circuits for about 24 hours. Additional tests were conducted to ensure that the system will maintain its same level of loudness over an extended period. The five-way dedicated system was fully operational at the time the telephone company completed its work in January 1985.	April 9, 1985

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
F.1.b. (cont'd.)		<p>The parties to the line (PNPP, Ohio DSA, and Ashtabula, Geauga and Lake County DSA's) have agreed to participate in a regular monthly check to ensure the continued operability and quality of the system. A day and time each month has been established and a "Periodic Test Instruction" procedure is being written. The first such test is scheduled for April 1985.</p> <p>It is worth noting that the evaluators stated "backup communications functioned effectively and communications were not inhibited during the exercise."</p>	
I.8.	<p>The OEPA member of the field monitoring team was not familiar with his sampling procedures.</p>	<p>The field monitoring team members will be trained in proper sampling procedures. Field monitoring and sampling <u>will</u> be an objective of the July exercise for the Davis-Besse Nuclear Power Station.</p>	April 24, 1985
K.3.a. K.3.b. (Gauga County)	<p>The ODOT crew assigned to the access control point did not have the proper dosimetry equipment, did not know how to obtain it and would not know how to use it. There was no exposure control for their emergency workers.</p>	<p>The State of Ohio Disaster Services Agency has a request to the Director of the Department of Transportation requesting training dates for the department's personnel. That information will be provided under separate letter when it becomes available.</p>	

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
K.3.a. K.3.b. (cont'd.)	(NOTE: It is the responsibility of the Ohio Disaster Services Agency to arrange for training of, and issuance of equipment to, the Ohio Department of Transportation. Therefor, the corrective response for this deficiency appears under the State of Ohio.)		

ASHTABULA COUNTY RESPONSE TO FEMA EXERCISE EVALUATION

Summary Listing of Deficiencies and Corrective Actions

Ohio
(State)

April 5, 1985
(Date)

Ashtabula County
(Community)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
E.7	Information contained in the EBS messages was not released at the JPIC.	The information in the EBS messages was presented orally by the Lake County Public Information Officer from the stage at the JPIC. It was not presented to the news media in written form. Procedures for the Public Information Officers (located at the JPIC) and the Public Information Liaison Officer located in the Ashtabula County EOC will be changed to facilitate the distribution of each EBS message in written form to news media personnel at the JPIC.	September 1985 (Procedures) April 1986 (Demonstration)
F.1.b.	The five-way telephone link proved unreliable during the exercise.	The five-way dedicated line was installed in segments during the weeks and days prior to the exercise, and was tested fully only a few times. Its failure during the exercise involved two connectors and remedial action was prompt. Since the exercise, the telephone company has spent considerable time "debugging" and testing the line. There were three separate tests of the entire system to include one which involved activated circuits for about 24	January 1985 (Operational) April 1985 (Beginning monthly tests)

ASHTABULA COUNTY RESPONSE TO FEMA EXERCISE EVALUATION

Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
F.1.b. (cont'd.)		<p>hours. Additional tests were conducted to ensure that the system will maintain its same level of loudness over an extended period. The five-way dedicated system was fully operational at the time the telephone company completed its work in January 1985.</p> <p>The parties to the line (PNPP, Ohio DSA, and DSAs of Ashtabula, Geauga and Lake Counties) have agreed to participate in a regular monthly check to ensure the continued operability and quality of the system. A day and time each month has been established and a "Periodic Test Instruction" procedure is being written. The first such test is scheduled for April 1985.</p>	
K.3.a.	Emergency workers in the field did not have mid and low range dosimeters.	The emergency plan will be changed to indicate clearly that each off-site emergency worker who is within the plume exposure pathway emergency planning zone (EPZ), has work assignment within the EPZ, or is a member of a decontamination monitoring team will be issued one CDV-730 (mid range) dosimeter, one CDV-742 (high range) dosimeter, one TLD, and a "Dosimetry Report Form." The plan will not prescribe a low range dosimeter since published guidance (FEMA REP-2, September 1980) specifies the mid range and high range direct reading dosimeters and a TLD.	September 1985

ASHTABULA COUNTY RESPONSE TO FEMA EXERCISE EVALUATION

Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
K.3.b.	EOC staff did not have an opportunity to actively monitor emergency worker exposure.	<p>Pre-exercise agreement with FEMA was that traffic control points would be activated at the proper time in the scenario and personnel at such points would remain until observed by the exercise evaluator. Once the evaluator had concluded the evaluation the traffic control points were to be dismissed. This agreement was in consideration of the policemen's and road crew's time (and cost) in that they would have no activity (they do not actually stop or direct traffic in an exercise) except an occasional message to the EOC. In this instance the evaluator concluded his observations and questioning in short order.</p> <p>In future exercises traffic control personnel will make at least one communication to the EOC indicating dosimeter readings.</p>	April 1986 (Demonstration)
K.5.b.	The Saybrook Fire Station is not an adequate facility for use as a decontamination center.	The Saybrook Fire Station will be either (1) replaced as a decontamination station or (2) arrangements in or near the station will be made to correct the shower and drain water situation.	September 1985

ASHTABULA COUNTY RESPONSE TO FEMA EXERCISE EVALUATION

Summary Listing of Deficiencies and Corrective Actions (cont'd.)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
L.1.	The hospital emergency room staff did not demonstrate all of the equipment necessary to handle a contaminated injured victim.	The Ashtabula County Medical Center staff did demonstrate cleansing of the patient with appropriate catch trays. A water retention receptical with associated paraphernalia was present in the treatment/decontamination room but it was not demonstrated. Additional equipment in the form of whole body trays were purchased for the Ashtabula County Medical Center on April 4, 1985. In future exercises participants will be instructed to demonstrate fully the equipment and supplies on hand.	April 1985 (Equipment)



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County of Geauga

13281 PAINESVILLE-RAVENNA ROAD • GEAUGA COUNTY SAFETY CENTER
CHARDON, OHIO 44024

DISASTER SERVICES AGENCY

PHONE (216) 285-2222, EXT. 603

DIRECTOR
DALE B. WEDGE

April 5, 1985

DEPUTY DIRECTOR
RONNIE N. EGING

Ken Cole
Ohio Disaster Services Agency
2825 West Granville Road
Worthington, Ohio 43085

Dear Ken:

Attached are my corrective responses to the FEMA Exercise Report (1/18/85) of the evaluated exercise held on 28 November 1984. You may relay these responses directly to FEMA or consolidate their response with yours and the County responses.

Thank you for your assistance in our training and exercise arrangements.

Sincerely yours,

Dale B. Wedge
Dale B. Wedge, Director
Gauga County
Disaster Services Agency

Attachment

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions

April 5, 1985

Ohio
(State)

Ohio
(Geauga County)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
E.1 (EOC)	The notification of "Unusual Event" received via commercial telephone was not verified.	Procedures for the Sheriff's Department and EOC Dispatcher, where appropriate, will be revised to more clearly address notification/verification procedures by means other than the five-way dedicated telephone line. Training will also emphasize the actions needed during such occurrences as system failure.	April. 1986 (Demonstrate)
E.7. (Media Relations)	Information contained in the EBS message was not released at the JPIC, e.g., presentation of protective action recommendations in terms of familiar landmarks or boundaries.	The information in the EBS messages was presented orally by the Lake County Public Information Officer from the stage at the JPIC. It was not presented to the news media in written form. Procedures for the Public Information Officer (located at the JPIC) and the Public Information Liaison Officer (located in the Geauga County EOC) will be changed to facilitate the distribution of each EBS message in written form to new media personnel at the JPIC.	Sept. 1985 (For review) April. 1986 (Demonstration)

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions

April 5, 1985

Ohio
(State)

Ohio
(Geauga County)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
F.1.b. (EOC)	The five-way telephone link proved unreliable during the exercise.	The five-way dedicated line was installed in segments during the weeks and days prior to the exercise, and was fully tested only a few times. It's failure during the exercise involved two connectors and remedial action was prompt. Since the exercise, the telephone company has spent considerable time "debugging" and testing the line. There were three separate tests of the entire system to include one which involved activated circuits for about 24 hours. Additionally tests were conducted to ensure that the system will maintain its same level of loudness over an extended period. The five-way dedicated system was fully operational at the time the telephone company completed its work in January 1985.	Jan. 1985 (Operational) April. 1985 (tested monthly)

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions

April 5, 1985

Ohio
(State)

Ohio
(Geauga County)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
F.1.b. (continued)		The parties to the line (PNPP, Ohio DSA, and DSAs of Ashtabula, Geauga and Lake Counties) have agreed to participate in a regular monthly check to ensure the continued operability and quality of the system. A day and time each month has been established and a "Periodic Test Instruction" procedure is being written. The first such test is scheduled for April, 1985.	
K.3.a. (Radiation Exposure Control)	Low and mid range dosimeters were not available for emergency workers in the field.	The emergency plan will be changed to indicate clearly that each off-site emergency worker who is within the plume exposure pathway emergency planning zone (EPZ), has work assignment within the EPZ, or is a member of a decontamination monitoring team will be issued one CDV-730 (mid range) dosimeter, one CDV-742 (high range) dosimeter, one TLD, and a "Dosimetry Report Form." The plan will not prescribe a low range dosimeter	Sept. 1985

UTILITY: Perry Nuclear Power Plant

Summary Listing of Deficiencies and Corrective Actions

April 5, 1985

Ohio
(State)

Ohio
(Geauga County)

<u>NUREG Item</u>	<u>Narrative Statement of Deficiency</u>	<u>Corrective Action Proposed</u>	<u>Scheduled Date</u>
K.3.a. (Continued)		since published guidance (<u>Guidance On Off-Site Emergency Radiation Measurement, FEMA Rep 2, September 1980.</u>) specifies the mid range and high range direct reading dosi- meters and a TLD.	
K.3.a. K.3.b. (Worker Exposure Control)	The ODOT crew assigned to the access control point did not have the proper dosimetry equipment, did not know how to obtain it and would not know how to use it. There was no exposure control for their emergency workers.	See State corrective actions	N/A

County of Lake
OFFICE OF
DISASTER SERVICES AGENCY
39 FAIRDALE STREET
PAINESVILLE, OHIO 44077

April 5, 1985

Mr. Kenneth Cole
Ohio Disaster Services Agency
2825 West Granville Road
Worthington, OH 43085

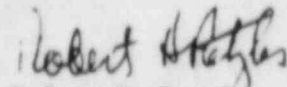
Dear Ken:

Please find enclosed Lake County Disaster Services Agency's revised response to the FEMA Exercise Report of January 18, 1985, for the Perry Nuclear Power Plant Joint Exercise held on November 28, 1984. Please forward these responses to FEMA, Region V or include them in your response submittal to FEMA.

Thank you for your assistance in our training and exercise arrangements.

Respectfully,

LAKE COUNTY DISASTER SERVICES AGENCY



Robert H. Retzler
Director

RHR:mb

Enclosure

LAKE COUNTY, OHIO, RESPONSE TO FEMA EXERCISE EVALUATION

Summary Listing of Deficiencies and Corrective Actions

Ohio
(State)

Lake
(Community)

NUREG ITEM	NARRATIVE STATEMENT OF DEFICIENCY	CORRECTIVE ACTION PROPOSED	SCHEDULED DATE
E.7.	Information contained in the EBS message was not released at the JPIC.	Each EBS message released will be telecopied in its entirety, from the Lake County EOC to the JPIC. Public Information Officers (in the JPIC) and Public Information Liaison Officers (located in County EOC's) will have procedures to ensure proper distribution of the EBS messages.	June 15, 1985
F.1.b.	The five-way telephone link proved unreliable during the exercise.	<p>The five-way dedicated line failure during the exercise involved two connectors. Since the exercise the telephone company has spent considerable time "debugging" and testing the line. Since the corrections were incorporated there have been three separate tests of the entire system of which one involved activating circuits for approximately twenty-four (24) hours. Additionally, tests were conducted to ensure that the system will maintain the same level of volume over an extended period. The five-way dedicated system was fully operational at the time the telephone company completed its work in January 1985.</p> <p>The parties to the line (PNPP, Ohio DSA, DSA's of Ashtabula, Geauga and Lake Counties) have established an agreement to participate in a regularly scheduled monthly check to ensure the continued operability and quality of the system. A day and time each month has</p>	<p>Completed January 25, 1985</p> <p>April 15, 1985</p>

NUREG ITEM	NARRATIVE STATEMENT OF DEFICIENCY	CORRECTIVE ACTION PROPOSED	SCHEDULED DATE
F.1.b. (continued)		been established and a "Periodic Test Instruction" procedure is being written. The first such test is scheduled for April, 1985.	
J.10.j.	Lake County was using a perimeter control map different from that shown in its 10-08-84 version of the plan.	The perimeter control point map in the plan will be updated to show the current perimeter control points. This map will coincide with the EOC perimeter control points map used in conjunction with exercises or an actual situation.	June 15, 1985
		All three counties (Ashtabula, Lake and Geauga) will coordinate their perimeter control points and maintain their EOC maps with information supplied by the other involved counties.	
J.12.	The Reception Center Manager did not have sufficient working knowledge of the facility's plan for operation.	Additional training will be conducted to ensure the Reception Center Manager and other key personnel have a working knowledge of the facility's overall plan for operation and the agencies, departments, and resources utilized to implement the facility's plan.	June 15, 1985
K.3.a. K.3.b.	Emergency workers in the field did not have mid and low range dosimeters and record keeping cards.	The emergency plan will be revised to indicate clearly that each off-site emergency worker who has a work assignment within the EPZ, or is a member of a decontamination team will be issued one CDV-730 (mid-range) dosimeter, one CDV-742 (high-range) dosimeter, one TLD and a "Dosimetry Report Form." The plan will not prescribe a low-range dosimeter since published guidance, (FEMA Rep-2, September 1980), specified the mid-range and high-range direct reading dosimeters and a TLD.	June 15, 1985

NUREG
ITEM

NARRATIVE STATEMENT OF DEFICIENCY

CORRECTIVE ACTION PROPOSED

SCHEDULED
DATE

K.3.a and K.3.b (continued)

Emergency workers are provided with a "Dosimetry Report Form" which asks for "Before" mission and "After" mission readings and a "Mission Total." This form constitutes the County's dosimeter recording procedure and all emergency workers participating in the exercise carried this form. There is no published guidance indicating that readings from direct reading dosimeters should be written down on record keeping cards hourly. Under the current procedure an emergency worker can, at any time, simply read the direct reading dosimeters and compare this reading with the reading recorded before the mission began to determine the current total dose. The "Dosimetry Report Form" instructions direct the emergency worker to "Read each CDV-742 each hour, or sooner, if instructed." Therefore, the current procedure satisfies the present guidelines for emergency worker control.

O.4.j. Radiological release data forms were not completely filled out.

Procedures and forms for recording information transmitted by telephone will be reviewed and changed, if necessary. Any changes made will be inserted into training programs for personnel using the procedures and forms for recording information transmitted by telephone.

June 15, 1985