

DRAFT 12/12/84

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: SHOREHAM EXERCISE

Enclosed is a letter dated November 14, 1984 from John D. Leonard, LILCO, to Harold R. Denton, NRC, regarding an exercise which LILCO has proposed for the week of February 11, 1985. The objective of the proposed exercise is the demonstration of the Shoreham Emergency Preparedness Plan and the Local Emergency Response Organization (LERO) Plan which is referred to as the Transition Plan.

In a letter to FEMA dated June 1, 1983 which was subsequently modified in a letter dated June 17, 1983, the NRC requested FEMA to provide separate findings on whether the LILCO Transition Plan is adequate, whether it is capable of being implemented and whether LILCO has the ability to implement the plan. These findings were requested by the NRC in connection with our continuing review of Shoreham's request for an operating license for full power. FEMA has provided findings to the NRC relating to the adequacy of the Transition Plan in several letters, the latest of which is dated November 15, 1984. This letter indicated that of the 32 inadequacies identified in a previous review of the Transition Plan, 8 remain inadequate. FEMA's letter also identified those

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aspects of the plan, including some of the remaining inadequacies, where legal authority issues continue to be of concern.

When an exercise is proposed by an applicant, the normal practice of our two agencies is to review the submitted objectives, provide comments to the involved parties and prepare to observe and evaluate the scheduled exercise. In this instance there are outstanding plan inadequacies and legal authority issues that should be resolved before a full participation exercise is conducted. We request that FEMA review the current LILCO proposal and take the lead in determining the appropriate level of exercise planning needed at this time.

We are enclosing letters to the NRC from Governor Cuomo and John C. Gallagher, Chief Deputy County Executive for Suffolk County, wherein they oppose the conduct of the exercise proposed by LILCO because of questions involving the legal authority of LILCO to implement its offsite plan. We will provide you a copy of our responses.

Please keep us informed of all developments regarding this effort since NRC resources in support of our review of the Shoreham application may be impacted.

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

Enclosures: See page 3

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Enclosures:

1. Ltr. from J. D. Leonard to
H. R. Denton, dtd 11/14/84
2. Ltr. from Governor Cuomo to
H. R. Denton, dtd 11/29/84
3. Ltr. from John C. Gallagher to
H. R. Denton, dtd 11/28/84

To: Richard Krimm, FEMA

From: Ed Jordan, IE

5 pages follow

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