

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

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BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

'85 DEC 23 P2:34

In the Matter of)
COMMONWEALTH EDISON COMPANY)
(Braidwood Station, Units 1 and 2)

Docket Nos. 50-456
50-457

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

AFFIDAVIT OF GORDON WENGER
REGARDING ROREM OFFER OF PROOF

Gordon Wenger, being duly sworn according to law, does depose and say:

1. I am Gordon Wenger, Emergency Management Planning Specialist, with the Technological Hazards Branch, Federal Emergency Management Agency (FEMA), Region V. I have held this position for the last six years. I am the Federal Team Leader for radiological emergency planning for Illinois and Indiana. I have participated in more than 50 exercises of nuclear power facilities, serving as an evaluator or evaluation team director. I have reviewed radiological emergency plans, written exercise reports, interim findings and Regional Director's Findings for all six of the states in FEMA's Region V, namely, Illinois, Indiana, Michigan, Minnesota, Ohio, and Wisconsin. A more complete statement of my professional qualifications was attached as an exhibit to my prefiled testimony regarding Rorem Contention 1(a) in this proceeding.

2. The purpose of this affidavit is to respond to Bridget Little Rorem's Offer of Proof which sets forth seven issues which, if admitted by

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this Atomic Safety Licensing Board (ASLB), would become Rorem Contentions 2 through 8. In general, these issues question whether certain subject matter is addressed by the Illinois Plan for Radiological Accidents (IPRA) or, if addressed, whether they are addressed adequately. I have the Applicant's Reply to Motion for Reconsideration in the Form of Offer of Proof and the supporting affidavit by Ms. Jane S. Fairrow and agree that the material facts are as stated. In this affidavit, I will discuss each issue in turn, point out where it is addressed in the IPRA, and offer my finding as to the adequacy of the treatment.

3. In preparing this affidavit, I have referred primarily to three volumes of the IPRA. Volume One (Vol. I, June 1985) contains the State General Plan and refers to all of the 10 mile and 50 mile EPZs surrounding nuclear power plants in the State of Illinois. Volume Seven (Vol. VII, Preliminary, August 1985) contains the plan specific to the Braidwood Station offsite planning. In addition, there are Procedures (Vol. I February 3, 1982 and Vol. VII 8, 1985) for the State and the Braidwood Station.

ISSUE 2:

4. Offer of Proof Issue 2 states:

Applicant must develop and demonstrate its capability to provide through scripts and/or other media information, substantive emergency information to adequately inform the public of emergency information in the event of an accident at the Braidwood Station through all radio, TV or EBS stations in the ingestion pathway zone, so as to enable the public to effectively evacuate in the event of an emergency and to re-enter the affected zone in the event of an emergency.

5. I understand that this issue involves how the public will be informed when and how it is safe to re-enter the Emergency Planning Zone (EPZ) after an evacuation has taken place. I have read the affidavit of Jana S. Fairow which supports the Applicant's Reply to Motion for Reconsideration in the Form of an Offer of Proof and I agree with her analysis and her conclusion that this broader question is adequately addressed.

6. The re-entry procedures are addressed in Vol. I at Chapter 2, Section 5(g); Vol. VII, Chapter 1, Annex 1A, Section 1(d); and Vol. VII-7-SOP-11.

7. In Vol. I, Chapter 2, it provides that the Illinois Department of Nuclear Safety (IDNS) will make the determination when it is safe for the public to re-enter affected areas of the EPZ. IDNS will initiate the notification procedures.

8. Vol. VII-7-SOP-11 is entirely devoted to, and deals at length with, the procedures to be followed by local officials in allowing the public safely to re-enter the 10 mile EPZ. Once it has been determined that unrestricted re-entry is safe, the County Emergency Services and Disaster Agency (ESDA) Coordinators will initiate the broadcast of Emergency Broadcast System (EBS) messages. At the same time, they will coordinate with the Joint Public Information Center (JPIC) so that the same information is available to all the news media in addition to other than the EBS stations.

9. The scripts for the messages to be broadcast over the EBS and released to other news media through the JPIC are intentionally general. It is expected that particularizing information will be added at the time

of their dissemination so that they will be more complete and accurate. The scripts for the EBS announcements of unrestricted and restricted re-entry appear as Attachment D to Chapter II, Vol. VII-SOP.

10. I find that the procedures for the dissemination of information about re-entry into affected areas of the EPZ are adequate.

ISSUE 3:

11. Offer of Proof Issue 3 states:

Applicant must develop and demonstrate its capability to adequately inform residential and transient populations within the EPZ in the event of an emergency so as to enable the populations to effectively evacuate or shelter including development of the specific means and content of such communications to specific populations.

12. I understand Issue 3 to question the adequacy of the plan to inform the permanent and transient population of the 10 mile EPZ when shelter or evacuation is necessary.

13. This question is addressed in Vol. I, Chapter 2, Sections E and F; Vol. VII, Chapter 1, Section C; and Vol. VII-7-SOP-6.

14. In a condensed form, the scenario to be followed in the event of an emergency is:

The Licensee will notify the Illinois ESDA (IESDA) of the development of the emergency. The IESDA will evaluate the licensee's recommendation and make the decision to notify the public and which sectors of the 10 mile EPZ are affected. The IESDA will notify the Grundy, Kankakee, and Will County Sheriffs' Dispatchers, as necessary, who will, in turn, the County ESDA Coordinators. They, upon the decision to activate the Alert and Notification System by County officials, will

notify the County Sheriff's dispatchers to activate the system. The system includes sirens and announcements through those sirens with voice capability, and authorize the activation of the mobile alerting as required, supplying appropriate messages. The prompt notification system will alert the public to tune to the EBS stations which are identified on page 15 of Vol. VII, Chapter 1, and in the public information brochure, Braidwood I. The scripts for the prompt notification announcements and the EBS broadcasts are included as Annex IA to this Chapter.

15. The prompt notification system will be targeted to specific populations. The 10 mile EPZ is divided into 16 sectors of 22.5° and each sector is divided into three zones. The first zone is from zero to two miles from the power plant; the second is from two to five miles from the plant; and the third is from five to ten miles. The decision making process by which the IESDA determines when to notify the public of an accident includes a system for determining which of these sectors and zones are affected. The messages which are generated by this process are particularized in that only the affected areas given specific route evacuation instructions in the event an evacuation is ordered. See Attachments C, D, and E to Vol. VII-7-SOP-8.

16. The interagency Regional Assistance Committee has reviewed the IPRA and has found the provisions for the prompt notification of the public to be adequate. I concur in this judgment. In addition, the plan has been the subject of an exercise on November 6, 1985. I participated in the evaluation this exercise and, on the basis of that participation, it is also my judgment that the plan can and will be implemented adequately

to inform the public in time to allow them effectively to take shelter or evacuate.

ISSUE 4

17. Offer of Proof Issue 4 states:

The program for notification of the public at the time of an accident is deficient in that it provides no means of informing employers in the EPZ as to what actions they should take with respect to facility shutdown, sheltering, or the release of employee personnel in the event that evacuation is required.

18. This issue questions the particular application of the prompt notification system to employers within the 10 mile EPZ. This is important in that there are a number of major employers within the Braidwood EPZ and the safe and orderly sheltering or evacuation of the affected portion of the 10 mile EPZ in the event of an emergency would depend upon their being notified. The IPRA focuses special attention on major employers, that is those with more than 25 employees. This is not to suggest that no attention is given to smaller employers, but only that the logistics of evacuating or sheltering larger concentrations of employees are more complex than is the case with smaller groups. All groups of employees receive the same benefit from the prompt notification system as the general public.

19. Attachments F, G, and H to Vol. VII-7-SOP-8, contain a comprehensive list of special facilities, including major employers, within the 10 mile EPZ. The list identifies the sector, zone, and community that each facility is in, as well as the name and phone number of an individual to contact in the event of an emergency.

20. At various places throughout this 7-SOP-8, there are references to the notification of major employers. Sections 4.1(E), 4.2(E), 5.1(E), 5.2(D), 6.1(E), 6.2(e).

21. I find that the IPRA makes adequate provision for notifying employers for the purpose of advising employees of the necessary protective action which are being implemented.

ISSUE 5

22. Offer of Proof Issue 5 states:

Applicant's arrangements for provision and exchange of emergency information to news media during an emergency is deficient in that it fails to designate a spokesperson in each principal organization who should have access to all necessary information and it fails to provide for the timely and accurate exchange of such information.

23. This issue is addressed by Vol. I, Chapter 8, and by Sections A and K of Chapters 2, 3, and 4 of Vol. VII.

24. Section A of Chapters 2, 3, and 4 of Vol. VII describes the method of initial notification in the event of a radiological emergency. The licensee first notifies IESDA through a direct telephone line circuit. IESDA notifies the Sheriff's Dispatcher, who then notifies the county ESDA Coordinator and Sheriff. If the situation is a general emergency, the licensee also notifies the county by the same means.

25. The Governor of Illinois or his designee is the spokesperson for the state. The Chief elected official or his or her designee is the spokesperson Grundy, Kankakee, and Will Counties and each municipality within those counties.

26. The Governor will receive information from two principal sources, the IESDA and the IDNS. The Governor's Press Office will disseminate information by commercial telephone facsimile machine to State of Illinois public information personnel at the JPIC who will then notify public information personnel from the licensee, Counties, contiguous states and the Federal Government present at the JPIC.

27. The county and municipality spokespersons will provide timely information to the county ESDA coordinator, or his or her designee, for coordination of local releases with the JPIC. The JPIC will be the source of timely and accurate information for all participants who have not already obtained the information.

28. I find that the plan adequately provides for the timely and accurate exchange of information among clearly designated spokespersons for all governmental bodies represented in the EPZ.

ISSUE 6

29. Offer of Proof Issue 6 states:

Applicant's public information program is deficient in that it fails to set out the means by which the public will be informed during an emergency of re-entry protective measures to be followed by the public in an emergency and the content of such means with respect to information concerning decontamination and interdiction of foodstuffs, water supplies, dairy and livestock, and field and garden crops.

30. This issue is treated in Chapters 2 and 5 of Vol. I and Vol. VII-7-SOP-11, Sections 4 through 6, Attachments A-D.

31. Chapter 2 of Vol. I is titled Concept of Operations. Section 5 deals with Parallel Actions, which include public information, radiation

control and re-entry. IDNS is responsible for all aspects of radiation exposure. Chapter 5 (Technical Functions), Section G.1 (Radiological Aspects of Technical Functions) gives a more detailed account of the role of IDNS in this regard. In Section 5, the authority of the Illinois Department of Agriculture which inspects, condemns, embargoes, and confiscates unwholesome foodstuffs is outlined and will make such inspections and determinations as called upon by the IDNS. As stated in Section 5(g), Chapter 2, Vol. I, the IDNS will determine when it is safe for the public to re-enter the affected area and public notification procedures will be implemented.

32. As I pointed out in Paragraph 9, above, the EBS scripts for the re-entry announcements are general. In the case of unrestricted re-entry, no enhancements on the subject of foodstuffs are necessary. In the case of partially restricted re-entry, appropriate information will be added.

33. I find that the plan makes adequate provision for informing the public concerning protective measures to be taken regarding foodstuffs at the time of re-entry.

ISSUE 7:

34. Offer of Proof Issue 7 states:

Applicant's public information program is deficient in that it fails to set out the means by which those segments of the population which lack mobility will be informed as to sheltering procedures and available means of transport in the event of an emergency.

35. I understand this issue not to question whether the plan provides for transportation of those people who are mobility impaired,

but rather to question how the mobility impaired public will be informed of the resources available, once an emergency occurs.

36. This question is covered in Paragraphs I through K of Sections 4.1, 5.1, and 6.1, Vol. VII-7-SOP-10; Paragraph L of Sections 4.3, 5.3, and K of 6.3 of that same SOP; Paragraphs B and C of Sections 4.1, 5.1, and 6.1 of Vol. VII-7-SOP-8; Attachments C, D, and E to Vol. VII-7-SOP-8; and Attachment B to Vol. VII-8-SOP-10.

37. Attachments C, D, and E are the EBS scripts for sheltering or evacuation to be used in Grundy, Kankakee, and Will Counties. Those scripts dealing with evacuation include the statements, "IF YOU ARE BEDRIDDEN, OR HAVE SOMEONE IN YOUR HOUSEHOLD THAT IS, CALL (Telephone number to be supplied). SPECIAL ARRANGEMENTS WILL BE MADE FOR YOU." and "IF YOU ARE IN NEED OF TRANSPORTATION, STAY TUNED TO THIS STATION FOR INFORMATION ON WHERE BUSES WILL BE DEPARTING FROM."

38. These EBS messages supplement the system for gathering information beforehand about those in need of transportation. This system is explained in the Emergency Information Brochure, Chapters 3 and 9 and in Vol. VII-7-SOP-12.

30. Attachment B 7-SOP-12 incorporates the plan for the provision of transportation to those in need of it. The other paragraphs I referred to in Paragraph 36, above, concern the preparations for evacuation (sheltering) including the preparation of EBS messages.

40. I find that the IPRA Vol. I and VII makes adequate provision for emergency transportation and for informing the public of ways in which transportation and sheltering may be arranged in the event of an emergency.

ISSUE 8:

41. Offer of Proof Issue 8 states:

Applicant's public information program does not adequately describe means by which cities and responsible officials located outside the EPZ will be notified of an emergency and given adequate information concerning the emergency so as to enable them to respond as host communities and to provide emergency assistance to responsible organizations within the EPZ.

42. This issue is addressed in Vol. VII, Chapter 1, Section C; in Vol. VII-7-SOP-8 at Sections 4.2, 5.2, and 6.2, Paragraphs L and M, and Sections 4.3, 5.3, and 6.3, Paragraphs E through J; and in Attachment I to of Vol. VII-7-SOP-8.

43. Attachment I is a comprehensive profile of sheltering facilities in host communities, that is communities outside of the 10 mile EPZ who have agreed to provide assistance in the event of an emergency.

44. Chapter 1 of Vol. VII, at pages 16 and 17 provides for the selection of evacuation routes and sheltering facilities on the basis of the direction of the plume exposure pathway. This selection is intended to minimize any delay in evacuation and to allow a maximum amount of time for notifying local government agencies and sheltering facilities. Sheltering is to be coordinated by regional IESDA coordinators in conjunction with local ESDA coordinators. This section of the IPRA Vol. VII makes specific provisions for communication channels to alert local coordinators to begin opening and staffing shelters.

45. Paragraphs L and M (Vol. VII-7-SOP-8, Sections 4.2, 5.2, and 6.2) describe the process of selecting the shelters to be used and of communicating that selection to the regional IESDA coordinator in prepara-

tion for evacuation. Paragraphs E through J (Vol. VII-7-SOP-8, Sections 4.3, 5.3, and 6.3) provide follow up procedures once evacuation has been recommended.

46. I find that the IPRA Vol. I and VII make adequate provision for the notifying of cities and responsible officials outside of the 10 mile EPZ in the event of an emergency within the EPZ.

Gordon L. Wenger
GORDON WENGER

SUBSCRIBED AND SWORN to
before me this 18 day
of December, 1985.

Donna L. Blair
Notary Public

My Commission Expires:

DONNA L. BLAIR
Notary Public, **County, Ill.**
My Comm. Expires **May 8, 1987**

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NUCLEAR REGULATORY COMMISSION

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OFFICE OF SECRETARY
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CERTIFICATE OF SERVICE

I hereby certify that copies of "REPLY OF NRC STAFF AND FEMA TO MOTION FOR RECONSIDERATION IN THE FORM OF AN OFFER OF PROOF" and "NRC STAFF AND FEMA RESPONSE TO LICENSING BOARD'S OCTOBER 19, 1985 ORDER REQUESTING INTERPRETATION OF RESPIRATORY PROTECTION AS USED IN NUREG-0654/FEMA-REP-1, REV. 1 SECTION G.1.c." in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, deposit in the Nuclear Regulatory Commission's internal mail system (*), or by express mail or overnight delivery (**) this 19th day of December, 1985:

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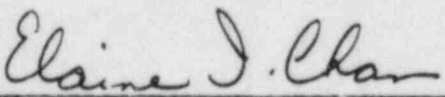
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