



Federal Emergency Management Agency

Washington, D.C. 20472

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MEMORANDUM FOR: J. Philip Stohr
Acting Director, Division of Radiation Protection
and Emergency Preparedness
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission

FROM: *Richard W. Krimm*
Richard W. Krimm
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Office of Natural and Technological Hazards Programs

SUBJECT: Inadequacies in the Seabrook Plan for Massachusetts
Communities

This is to confirm my conversation of February 18, 1988 with Nuclear Regulatory Commission (NRC) staff related to inadequacies in the Seabrook Plan for Massachusetts Communities (SPMC). In your absence, I spoke to Frank Miraglia and Timothy Martin of Thomas Murley's staff. As I indicated in the telephone call, the Federal Emergency Management Agency (FEMA) had identified 39 inadequacies as set forth in an initial draft review of the plan. These were divided into two groups, as shown on the attached list. The first group included 16 inadequacies which needed to be corrected, in the view of the FEMA, prior to the conduct of an exercise. Two areas of great concern to FEMA are the absence of an alert and notification system and the staffing shortfalls apparent in the utility's plan.

Since that time, the FEMA Regional Assistance Committee (RAC) Chairman for the SPMC review, Dick Donovan, has conducted a site visit in the Massachusetts portion of the Seabrook Emergency Planning Zone. During that visit, he gave a briefing on the draft review and evaluation. Also, based on the observations and evaluations made during his visit, he has added 4 additional inadequacies to the previous total of 39. These inadequacies are related to the following NUREG-0654 elements: E.5, I.7, J.10.h, and M.4. Of these additional inadequacies, the first three fall into the group which constitutes impediments to an exercise.

Given the nature of these inadequacies, the probability of additional plan amendments to address these and other changes in the SPMC, and the identification of any similar problems with the offsite plans for New Hampshire and Maine, we have serious concerns about the advisability of continuing on the current schedule for the plan review and exercise. It has also come to our attention that New Hampshire Yankee itself has similar concerns and has inquired informally about postponing the projected date for an exercise of the SPMC.

We would like to discuss with you as soon as possible the feasibility of adjusting the schedule to accommodate both the concerns of the utility and to allow the generation of the best possible plans before the conduct of an exercise. I will call you in the next couple of days to arrange a mutually convenient time to discuss these issues.

Attachment
As Stated

IE35
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Group I: Inadequacies in plan that should be corrected prior to conducting and exercise

- A.3 Inclusion of certain written agreements - State of N.H. media center, field monitoring.
- A.4 Offsite response organization 24 hr. continuous operation
- E.3 Content initial emergency messages
- E.6 Administrative and physical means for notifying and providing instructions to the public
- E.7 Written messages for the public consistent with licensee's classification scheme
- E.8 Coordination of emergency messages
- F.1.e. Alerting/activating emergency personnel in response organizations
- G.3 Points of contact and location for use by news media
- I.8 Equipment and capabilities to make assessments of radiological hazards
- I.10 Means for relating such things as contamination levels, water and air activity levels to dose rates
- J.9 Capability for implementing protective measures based on PAG's and other criteria
- J.10.c. Means for notifying all segments of the transient and resident population
- J.10d Means for protecting mobility impaired
- J.10.m. Basis for choice of recommended protective actions from plume EPZ
- J.11 Measures related to ingestion pathway
- J.12 Registering and monitoring evacuees

Group II: Inadequacies in the plan that need not be corrected prior to the conduct of an exercise but should be corrected for positive finding on the plan

- A.1.b Offsite response organization shall specify concept of operations
- G.1 Information to public on how they will be notified and what their actions should be
- G.2 Annual distribution of public information materials
- G.4.b. Information exchange among designated spokesperson
- J.10.g. Describe means for relocating public in plan
- J.10.j. Control access to evacuated areas and organization responsibilities for such control
- J.10.l Time estimates for evacuation
- K.3.a. 24-hour capability to determine doses received by emergency personnel
- K.3.b. Ensure dosimeters are read and maintain dose records for emergency workers.
- K.4 Establish decision chain for authorizing emergency workers to exceed EPA guidelines
- L.1 Local and backup hospital and medical services having capability for evaluation of radiation exposure.
- L.3 Designation and location of medical facilities
- L.4 Arrange for transporting victims of radiological accidents
- M.1 Plans and procedures for reentry and recovery

0.4.g. Local support services personnel
0.4.k Establish training programs for plan implementers
0.6 Training for non-participating state and local governments
P.11 Copies of offsite plan (provision of state and local government)
A.3 Written agreements except as shown on page 1
C.1.b Federal resources expected
J.10.b. Maps showing population distribution
J.10.e. Provisions for use of radioprotective drugs
P.6. Detailed listing of supporting plans and their sources