

June 26, 1997

Tennessee Valley Authority
ATTN: Mr. Oliver D. Kingsley, Jr.
President, TVA Nuclear and
Chief Nuclear Officer

6A Lookout Place
1101 Market Street
Chattanooga, TN 37402-2801

SUBJECT: FEMA OFFSITE FINDINGS FOR THE BROWNS FERRY EMERGENCY PREPAREDNESS
EXERCISE

Dear Mr. Kingsley:

Enclosed is a copy of the June 13, 1997, letter from the Federal Emergency Management Agency (FEMA) to the Director of the Alabama Division of Emergency Management. The letter provides a description of the Deficiency and Area Requiring Corrective Action (ARCA) identified by FEMA concerning offsite activities during the recent Browns Ferry Emergency Exercise.

You are encouraged to assist the offsite agencies as needed in demonstrating the necessary corrective action required by the letter.

If you have any questions about this letter please contact me at
(404) 562-4653.

Sincerely,

(Original signed by K. P. Barr)

Kenneth P. Barr, Chief
Plant Support Branch
Division of Reactor Safety

Docket Nos. 50-259, 50-260, 50-296
License Nos. DPR-33, DPR-52, DPR-68

Enclosure: As stated

cc w/encl: See page 2

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cc w/encl:

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State Health Officer
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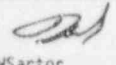
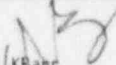

cc w/o encl:
Federal Emergency Management Agency
Region IV
3003 Chamblee-Tucker Road
Atlanta, GA 30341

Distribution w/encl: See page 3

Distribution w/encl:

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NRC Senior Resident Inspector
 U.S. Nuclear Regulatory Commission
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OFFICE	RII:DRS	RII:DRS	RII:DRP			
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Federal Emergency Management Agency

Region IV

3003 Chamblee-Tucker Rd

Atlanta, GA 30341

June 13, 1997

Mr. Lee Helms, Director
Division of Emergency Management
5898 County Road 41
Clanton, Alabama, 35046-2160

Dear Mr. Helms:

The evaluation of the June 4, 1997, Browns Ferry Nuclear Power Plant exercise identified a deficiency involving the accuracy of the EAS messages issued by Morgan County. This deficiency was exacerbated by the lack of coordination between the Radiation Control Agency, the Alabama Emergency Management Agency and Lauderdale, Lawrence, Limestone and Morgan Counties. As a result, a remedial exercise is required within 120 days of the exercise but not later than October 2, 1997.

The FEMA Radiological Emergency Preparedness (REP) Exercise Manual (FEMA-REP-14), September 1991, defines a Deficiency as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

The following Deficiency has been identified for Morgan County under REP Objective 11, FEMA REP-14 (NUREG 0654/FEMA REP-1, REV. 1., reference is provided in parentheses at the conclusion of the description).

Issue Number: 97-07-11-D-01

EAS messages contained errors that may have precluded the broadcast of the message and would have confused the public.

The EAS message, RELEASE # 002, contained the following errors. The prescribed message used was for an "Alert" declaration instead of a "Site Area Emergency" and the "EAS ACTIVATION REQUESTED" title was crossed out.

Health Orders 3 and 4 were issued at 10:55 a.m. They ordered the evacuation of sectors A-2, B-2, F-2, G-2, A-5, and B-5 and the shelter-in-place for sectors A-10, B-10, and K-10. The counties decided at 11:02 a.m. to activate the sirens at 11:12 a.m. and to issued an EAS message. Morgan County agreed to this activation

ENCLOSURE

time over the "Hoot-N-Holler", but instead decided not to activate the sirens and only issue an EAS message. However, RELEASE #006, was issued at 11:10 a.m. and stated that the 2 mile radius was to be evacuated, which included only a river area within Morgan County. It further stated that the Alabama State Health Officer ordered person living in pre-designated sectors to take shelter as a protective action. Morgan identified that no sectors in Morgan County were affected, but that sectors A-5, G-2, A-2, B-2, F-2, and B-5 in other counties were to shelter-in-place. Sirens were activated in the other counties at 11:12 a.m. and EAS messages concerning the evacuation of these sectors were sent out at 11:13 a.m. The errors in these messages would have caused confusion to the public.

Limestone and Morgan Counties both used WZYP as their EAS radio station (LP-1). During the exercise Morgan County faxed a number of non-EAS messages to the EAS radio station, which could have contributed to confusion at the radio station and the public. The state bulletin, SLO RELEASE # 1, which contained the heading "For Immediate Release/ EBS Activation Requested" was sent to the station at 11:01 a.m.; TVA news release #3 was faxed to the radio station at 11:13 a.m.; and at 11:24 a.m. Health Orders 3 and 4 were faxed. [NUREG-0654/FEMA-REP-1, E.7]

The following Area Requiring Corrective Action was identified for the State of Alabama:

Issue Number 97-07-9-A-01

The Alabama Emergency Management Agency did not implement a fully coordinated process with the Radiation Control Agency and Lauderdale, Lawrence, Limestone, and Morgan Counties for protective action implementation, and public notification. The May 1997, Browns Ferry Nuclear Power Plant REP SOP, states (page 5): "Direction and Control authority for a particular incident will be at the AEOC and will remain there." Protective actions were implemented, but the coordination only included the counties' siren activation time and message broadcast time. Coordination was adversely affected by the following: 1) State-level decision makers did not discuss protective actions with the counties over the "Hoot 'n Holler" 2) Location of the SEOC (AEMA) "Hoot 'n Holler" in the communications room precluded effective use by the direction and control group; 3) Delay in the distribution of Health Orders 1 and 2 due to problems with the internal State message handling system.

Prior to the remedial drill, we recommend the following actions take place:

Convene a meeting with FEMA, AEMA, RCA, Lauderdale, Lawrence, Limestone, and Morgan Counties to review the SOPs and make necessary improvements and corrections to assure coordinated decisions, and that accurate and timely information is transmitted to the public.

We understand as stated in Annex B, Radiation Control, Alabama Emergency Response Plan for Nuclear Power Plants, paragraph IV, Concept of Operations that:

"RCD will determine the protective actions needed and issue any orders necessary to meet the situation. Such orders shall have the effect of law.

Information on the status of the incident and the protective actions ordered shall be immediately transmitted to the Alabama Emergency Management Agency (AEMA) duty officer, the Governor's Office, and the director or administrator of each organizational branch of the Department of Public Health needed to implement the protective actions ordered. AEMA will relay this information to the affected counties and appropriate state agencies."

Recognizing that the RCA is the decision making authority within the State concerning protective actions, other factors which may not be known to the RCA, such as a bridge being out or other significant impediments to evacuation, may affect the protective action decision. Direct coordination between RCA, AEMA, Lauderdale, Lawrence, Limestone, and Morgan Counties, utilizing the "Hoot' n Holler", would provide current information to RCA. Plans and procedures should be revised to establish an effective means of coordination.

Review the prescribed EAS messages of each county to develop standardized message format and better recognition of message type.

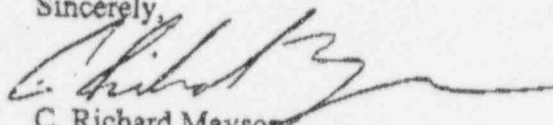
Provide training to the individuals who will implement the revised procedures.

All plans or procedural changes required to correct the noted Deficiency and ARCA will be submitted to the FEMA Region IV office within 120 days of the exercise but not later than October 2, 1997.

We are writing the Browns Ferry Exercise report and will have a draft report out to you on July 7, 1997 for your review and comment.

Should you have questions, please contact Don Cornell at 770-220-5460.

Sincerely,



C. Richard Mayson
Acting Regional Director