



Jane Dee Hull
Governor



Aubrey V. Godwin
Director

4814 South 40th Street

Phoenix, Arizona 85040-2940

(602) 255-4845
Fax (602) 437-0705

28 January 2000

Gail M. Good, Chief
Plant Support Branch, Division of Reactor Safety
Nuclear Regulatory Commission Region IV
611 Ryan Plaza Drive, Ste. 400
Arlington, TX 76011-8064

Re: Your letter of 24 January 2000 to Gregg Overbeck, Senior Vice President,
Arizona Public Service Company, regarding FEMA's Exercise Evaluation
Report of the 9 March 1999 PVNGS Emergency Preparedness Exercise

Dear Ms. Good:

Attached please find my letter to James L. Witt, Director, Federal Emergency
Management Agency. You should be aware that the FEMA report has not gone
without challenge.

Specifically, I am concerned that the report contains an entry that is incorrect, a
fact that was brought to the attention of the evaluators before issuance of the
final report, yet remains in that report. Further, other statements are included
that evaluators said would not appear in the report. This refers to check sources
for high range survey meters. I am further concerned over the apparent
disregard of our comments on draft reports and the lack of any dialog that could
aid in resolving any problems and/or misperceptions.

For the most part, FEMA evaluations are fair and reasonable; however, this
report struck a nerve, thus the letter to Director Witt.

Should you have any questions, please call me.

Sincerely,

Aubrey V. Godwin
Director

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January 24, 2000

Mr. James L. Witt, Director
Federal Emergency Management Agency
500 C Street SW
Washington, D.C. 20472

Dear Director Witt,

We have recently received FEMA's Final Evaluation Report, dated 14 December 1999, for the 9 March 1999 Palo Verde Nuclear Generating Station Offsite Biennial Exercise. There are some factually incorrect and inaccurate items in the report that need to be addressed.

Under the heading Areas Recommended for Improvement (ARFI), there is a entry referring to silver zeolite cartridges not being available in the field. This is not the case; the Agency individual directly in charge of field operations showed one of the evaluators, Bill Serrano, a case of 24 cartridges in the Agency command vehicle. These cartridges are carried in that vehicle as a contingency every time it goes to the field for training or for exercises and drills.

In the Planning Issues section, there is an entry taking exception to the fact that there was not a radioactive check source provided in the field to check the high range survey instrument. These instruments have a range of 0 – 500 R/hour using multiplier scales. We would need a check source of sufficient strength to require a license in order to cause the meter needle to deflect upscale far enough to obtain an adequate calibration check, even on the lowest scale. We do not propose to put licensable sources in our field kits or maintain them at our field command post, both essentially uncontrolled locations. These instruments are calibrated annually and are source checked at our office under controlled conditions before use. Additionally, Objective 6, Field Radiological Monitoring-Ambient Radiation Monitoring, in REP 14, neither has a specific reference to a high range survey instrument check source as it does for low range GM detectors, nor does it specifically require check sources for any instrument. Objective 6 says, in part, "**When available**, appropriate radioactive check

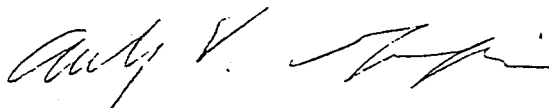
sources...should be used for checking the proper operational response of the survey instruments." (Emphasis added). This evaluation comment has been discussed with senior evaluators and our understanding from those discussions is that this item would not appear in the report. Moreover, as a matter of comparison, the civil defense high range survey meter, CD V-715, range 0-500 R/hr, over which FEMA had control for both wartime use and peacetime power reactor incident response for many years, never had a check source, nor was one ever required. To my knowledge, no other state is required to have a check source for high range instruments.

In addition to the above comments, we are awaiting the resolution of two planning issues from the evaluated medical exercise held 18 November 1998. These involved FEMA's recommendation to provide dosimetry and training to Rural Metro Fire Department, the first response organization in the exercise. Rural Metro provides fire and ambulance service to much of the area around the Palo Verde Nuclear Generating Station; it is a private, for profit, organization. Compliance with the recommendation would mean expending public monies for private enterprise; this is not permitted in Arizona.

There are several other evaluator comments/recommendations in the 9 March 1999 exercise report that are apparently quite subjective and have no consistency from evaluation to evaluation. During one exercise, players will perform an action, or not, and there will be no comment. During the next exercise, similar events will occur and there will be evaluation comments. Our procedures for the conduct of various activities all have reasons supporting them; when a comment is made in a draft report that contradicts what we do and there appears to be no rationale for the comment other than subjectivity, we respond with our reasons for the action. When there is no change from the draft to the final report, and no dialog acknowledging our response to the draft that would provide a FEMA perspective, I have to wonder if anyone reads our responses.

In view of the above, I respectfully request that the evaluation report be withdrawn pending resolution of the cited issues.

Thank you very much for your attention in this matter.



Aubrey V. Godwin
Director

pc: Martha Whetstone, Director, FEMA RIX
Tom Ridgeway, RAC Chair, FEMA RIX
Richard Echevarria, Evaluation Team Leader, FEMA RIX