



International Isotopes Fluorine Products

International Isotopes Fluorine Products, Inc. (IIFP)
A Wholly Owned Subsidiary of
International Isotopes, Inc. (INIS)

Fluorine Extraction Process & Depleted
Uranium De-conversion
(FEP/DUP) Plant

License Application

Chapter 8 Emergency Management

Revision B
December 20, 2011

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8 EMERGENCY MANAGEMENT

Actions for response to emergencies at the International Isotopes Fluorine Product, Inc. (IIFP), Lea County, New Mexico facility are addressed in the separate IIFP Emergency Management Plan (EMP) Revision B document.

The IIFP EMP is developed in accordance with 10 Code of Federal Regulations (CFR) 40.31(j) (CFR, 2009) and conforms to the guidance presented in Regulatory Guide 3.67, “Standard Format and Content for Emergency Plans for Fuel Cycle and Materials Facilities,” U.S. Nuclear Regulatory Commission (NRC), 1992). This EMP also conforms with and addresses the acceptance criteria specified in Chapter 8 of NUREG-1520, Revision 1, “Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility,” (NRC, 2010). The IIFP EMP Revision B is submitted to the NRC under a transmittal separate from the License Application (LA) chapters.

The IIFP Emergency Management Plan identifies outside response organizations that review the EMP pursuant to the requirement in 10 CFR 40.31(j). As part of the EMP development, the offsite response organizations that are expected to respond to an accident event at the IIFP Facility were provided the final draft of the initial IIFP Emergency Management Plan for their review and comment. The following is a list of those response organizations that were requested to comment on the initial Emergency Plan (hereafter referred to as the Emergency Management Plan) and to support IIFP Memorandums of Understanding (MOU) for response to accidental events at the facility.

- Eunice, New Mexico Fire and Rescue
- City of Eunice, New Mexico Police Department
- Lea Regional Medical Center, Lea County, New Mexico
- Lea County, New Mexico Emergency Management, including comments and support representing the Lea County Volunteer Fire Departments of Monument, Knowles and Maljamar, New Mexico
- Hobbs, New Mexico Fire Department
- Lea County, New Mexico Sheriff’s Department
- New Mexico State Department of Homeland Security

Comments on the final draft of the initial IIFP Emergency Plan Revision A (now referred to as EMP Revision B) were received from each of the above response organizations via letter and verbal communications. Comments received via verbal communications were documented in the Revision A Comment Sheet. All of the response organizations comments were incorporated into the Emergency Plan Revision A; some of which were redundant. Questions were resolved via verbal communications or through email correspondence. Copies of the correspondences are included as Section 8.1. Some comment providers marked key points in their correspondence with “yellow” highlight. Those highlight markings remain in the comment correspondence. A record of the comment resolutions is provided as Section 8.2, ‘Summary of Comment Resolution.’

8.1 LOCAL RESPONDER CORRESPONDENCE:

8.1.1 Eunice, New Mexico Fire and Rescue



EUNICE FIRE AND RESCUE

1107 Avenue J
 P.O. Box 147
 Phone: 575-394-3258
 Fax: 575-394-3495
 Chief Ron Grogan

To Whom It May Concern:

Here are my comments in regards to the Emergency Plan Review Request that I received.

Page 3: New Mexico SR 209 does not run south from Hobbs to Eunice and Jal. NM SR 18 does run south from Hobbs to Eunice and Jal.

Page 37: Needs to be modified in the first paragraph to include Monument, NM Fire Department. Their fire district borders the proposed site on the west side and south side. While they do not have EMS transport capabilities, they do have EMT's, fire, and rescue capabilities.

Page 38: Same as above needs to be modified to include Monument, NM Fire Department.

While I am not very knowledgeable about the process, the plan appears to be well thought and prepared.

Ronald Grogan
 Chief
 Eunice Fire & Rescue

JJM-2009-52

September 25, 2009

International Isotopes Fluorine Products – Emergency Plan Comment Sheet

Reviewing Organization: Eunice Fire and Rescue Services	Reviewer Name: Chief Ron Grogan
Organization Address: P.O. Box 747	Phone Number: _____
Eunice NM, 88231	Email Address: _____
	Date Received: _____ Date Completed: _____

Use Additional Sheets as Necessary

Page	Section	Comment
3	2.2.1	New Mexico SR 209 does not run south from Hobbs to Eunice and Jal. NM SR 18 does run south from Hobbs to Eunice and Jal.
37	7.4.2	Needs to be modified in the first paragraph to include Monument, NM Fire Department. Their fire district borders the proposed site on the west side and south side. While they do not have EMS transport capabilities, they do have EMT's, fire, and rescue capabilities.
38	7.4.2	Same as above needs to be modified to include Monument, NM Fire Department
Comments provided via letter, comments transcribed to form by John Miller		

8.1.2 City of Eunice, New Mexico Police Department



**CITY OF EUNICE, NEW MEXICO
POLICE DEPARTMENT**

P.O. BOX 159, EUNICE, NM 88231
PHONE 575-394-2112
FAX 575-394-9025



Chief Kevin P. Burnam
chiefburnam@valornet.com

Date: 10/13/09

To: L. Velasquez

Re: Isotopes plant

Lorenzo,

Per our conversations I have reviewed most of the Isotopes emergency plan. Even though the Eunice Police Dept. is not listed as a backup agency in case of an emergency we would make our officers available if requested. As Chief of Police of Eunice I think the Isotopes plant is another strong addition to the economy of Lea County, NM. If you need anything from my agency please feel free to call.

Best regards,



Chief of Police

8.1.3 Lea Regional Medical Center, Lea County, New Mexico



LEA REGIONAL
MEDICAL CENTER

Facility Management Department

John Miller
International Isotopes
4137 Commerce Circle
Idaho Falls, ID 83401

Mr. John Miller:

Lea Regional Medical Center (LRMC) has received a copy of your draft emergency response plan for the facility that will be located west of Hobbs, NM. At this time, we do not have any issues with the information provided. We look forward to working with the facility in the future.

If you have any questions or require assistance from LRMC, please contact me by email or the phone numbers listed below.

Sincerely,

Scott Norred
Facility Management Director / Safety Officer
Lea Regional Medical Center
5419 N. Lovington Hwy
Hobbs, NM 88240
Telephone 575-492-5382
Fax 575-492-5556

8.1.4 Lea County, New Mexico Emergency Management

Lea County Emergency Management
100 North Main, Suite 4
Lovington, New Mexico 88260

Phone (575) 396-8607
Fax (575) 396-2093
lvelasquez@leacounty.net

John Miller
International Isotopes
4137 Commerce Circle
Idaho Falls, ID 83401

Mr. John Miller

Lea County Emergency Management has received a copy of your draft emergency response plan for the facility that will be located West of Hobbs NM on State Road 483. Thank you for talking to me and addressing some of the changes to the plan concerning police and fire agencies. We look forward to working with you in the future. I am writing this letter of support to include our Lea County Volunteer Fire Departments (Monument) (Knowles) and (Maljamar).

If you have any questions or require assistance from Lea County Emergency Management. Please contact me by email or the phone numbers listed below.

Lorenzo Velasquez
Lea County Emergency Management
100 N. Main Suite 4
Lovington, NM 88260

O- (575) 396-8607
C- (575) 605-6561

8.1.5 Hobbs, New Mexico Fire Department



**Hobbs Fire Department
301 E White
Hobbs, NM 88240
575-397-9308**

October 6, 2009

Lorenzo Velasquez
Emergency Preparedness Coordinator
100 N. Main, Suite 4
Lovington, NM 88260

Mr. Velasquez,

This letter is providing you and your office a formal response from the City of Hobbs Fire Department referencing "The International Isotopes Incorporated" emergency plan. A review of this plan and its content was conducted by senior staff members of the Hobbs Fire Department. Minor questions and changes have been recommended in the attached comment sheet provided. The City of Hobbs Fire Department is committed to support this plan within its jurisdictional authority and/or resources, as well as, the operation of International Isotopes Incorporated.

Please feel free to contact me with any additional.

Sincerely,

Manuel R. Gomez
Fire Chief

International Isotopes Fluorine Products – Emergency Plan Comment Sheet		
Reviewing Organization:	Hobbs Fire Department	Reviewer Name: Chief Gomez
Organization Address:	301 East White St. Hobbs, NM 88240	Phone Number: 575-397-8608
		Email Address: mgomez@hobbsnm.org
		Date Received: 09-29-2009 Date Completed: 10-6-2009
Use Additional Sheets as Necessary		
Page	Section	Comment
pg.32	7.3.1	What method of communication will the EMD or CMO utilize with local Fire Department's?
pg.33	7.3.4	What level of training/certification does your Haz Mat team possess?
pg.34	7.3.5	Upon site emergency
pg.37	7.4.2	Fire support HFD in addition to resources listed we have a fully equipped Haz Mat response vehicle with 19 fully trained Haz Mat technicians, and all other personnel are Operations/Ops Decon certified.
pg.37	7.4	Remove Hobbs Fire and Rescue
pg.37	7.4.1	Remove Hobbs Fire and Rescue, replace with Hobbs Fire Department
pg.37	7.4.2	Remove Hobbs Fire and Rescue, replace with Hobbs Fire Department
pg.37	7.4.2	Class rating of 4- What is this rating?
pg.37	7.4.2	Remove Eunice Fire Department, replace with Monument Volunteer Fire. Monument is adjacent/adjoining response coverage area.

Redacted – Security related information

Redacted – Security related information

8.1.6 Lea County, New Mexico Sheriff 's Department



LEA COUNTY SHERIFF'S DEPARTMENT

Rod Coffman • Sheriff

Hobbs Substation
1923 North Dal Paso, Ste. A
Hobbs, NM 88240
Fax: 505-397-6095

215 East Central
Lovington, NM 88260
Phone: 505-396-3611
Fax: 505-396-6242

October 2, 2009

John Miller
International Isotopes
4137 Commerce Circle
Idaho Falls, ID 83401

Mr. John Miller:

Lea County Sheriff's Department has received a copy of your draft emergency response plan for the facility that will be located West of Hobbs, NM. After reviewing the plan, I have submitted with this letter the comments and requested changes. We look forward to working with this facility in the future.

If you have any questions or require assistance from LCSD, please contact me by email or the phone numbers listed below.

Sincerely,

A handwritten signature in black ink that reads "Rod Coffman".

Rod Coffman, Sheriff
Lea County Sheriff's Department
215 E. Central
Lovington, NM 88260
575-396-3611 dispatch
575-396-6555 fax
575-396-1169 admin.
rcoffman@leacounty.net



Redacted – Security related information

8.1.7 New Mexico State Department of Homeland Security and Emergency Management

Bill Richardson
Governor

John W. Wheeler
Secretary



DEPARTMENT OF HOMELAND SECURITY AND EMERGENCY MANAGEMENT

November 19, 2009

John J. Miller, CIIP
Radiation Safety Officer
International Isotopes, Inc.

Dear Mr. Miller:

I have reviewed the International Isotopes Fluorine Extraction facility emergency site plan and have added the following changes to the document.

Section:

7.3.10 First Aid officer Training level: we would like more detail at what EMS level the officer is trained, example being Basic First Aid, EMT Basic, EMT Intermediate or EMT Paramedic. This gives us an indication of your onsite medical capability.

7.3.13 Respiratory Protection: we would like more detail as to what type of respiratory protection is on site, examples are face mask, Air-Purifying Respirator or Atmosphere supplying respirator, Again this gives us an indication of the inhalation hazards the onsite response team will be exposed to.

7.4 Local Off site Assistance to Facility: change to show NMDHSEM instead of DPS OEM
Also noted why is an MOU needed with our agency?

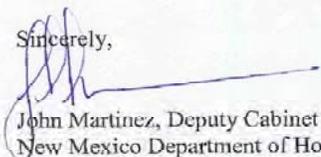
7.4.3: Law Enforcement: I have added the requirement by state statute that State Police are contacted and any emergency hazmat operations be run according to the states HMER plan.

8.2.2: Site Area Emergency Classification: change to reflect NMDHSEM instead of DPS OEM.

9.2.1.3: Radio System: change to reflect NMDHSEM instead of DPS OEM.

If you or your staff has any questions, please feel free to contact Don Shainin of my staff at (505) 476-9628.

Sincerely,


John Martinez, Deputy Cabinet Secretary
New Mexico Department of Homeland Security & Emergency Management

P.O. Box 27111
Santa Fe, New Mexico 87502
(505)476-9600

John J. Miller

From: Shainin, Don, DHSEM [don.shainin@state.nm.us]
Sent: Friday, December 04, 2009 7:17 AM
To: John J. Miller
Subject: RE: Emergency plan

Thanks, that will work for us.

From: John J. Miller [mailto:jjmiller@intisoid.com]
Sent: Thursday, December 03, 2009 3:21 PM
To: Shainin, Don, DHSEM; Martinez, John, DHSEM
Subject: RE: Emergency plan

John/Don

You had two Red-Lines in the EP that were questions requiring clarification more so than requested changes in text:

Section 7.3.10 – you insert the question: **what level are these employees trained at? Basic, Intermediate or Technician** I reworded the paragraph from:

A vehicle will be kept on standby for prompt dispatch to the emergency site. Trained employees will be organized into first aid teams to care for injured personnel under direction of the First Aid Officer or his designee. The First Aid Officer also requests ambulances and off-site medical support services as required.

To:

A vehicle will be kept on standby for prompt dispatch to the emergency site. **EMT employees trained in basic first aid and CPR** will be organized into first aid teams to care for injured personnel under direction of the First Aid Officer or his designee. The First Aid Officer also requests ambulances and off-site medical support services as required.

Section 7.3.13 5th bullet – you raise the question: **Dons appropriate personal protective equipment. What type of respiratory protection is to be used?**

PPE, including the respiratory protection will be selected according to the specific emergency conditions. I can tell you we intend to have both air purifying and air supplied respiratory protection available for emergency response. Air purifying respiratory equipment would only be used when we are dealing with radioactive particulates at concentrations low enough to be supported by the protection factor offered by the respirator. Emergencies involving fluoride gas compounds would require air supplied respiratory protection. We have yet to identify specific models that we will utilize.

I changed the bullet to read. - **Dons the appropriate level of personal protective equipment as the hazard dictates.** I think this addresses your question.

All of your other red-lined comments were incorporated as they were written.

We really appreciate the time you spent reviewing the document and your valuable input. We will submit the plan with all responder comments addressed. We will then forward the final plan as approved by the NRC to each off-site response organization. Please contact me if you have questions regarding the EP and the comment resolution.

John J. Miller, CHP
Radiation Safety Officer

8.2 SUMMARY OF COMMENT RESOLUTION

Reviewing Organization	Section	Comment	Resolution
Lea County Sheriff's Office	7.4	Redacted – Security related information	Incorporated in EMP
Lea County Sheriff's Office	7.4.3	Redacted – Security related information.	Incorporated in EMP
Eunice Fire and Rescue	2.2.1	New Mexico SR209 does not run south from Hobbs to Eunice and Jal. NM SR18 does run south from Hobbs to Eunice and Jal.	Incorporated in EMP
Eunice Fire and Rescue	7.4.2	Needs to be modified in the first paragraph to include Monument, NM Fire Department. Their fire district borders the proposed site on the west and south sides. While they do not have EMS transport capabilities, they do have EMT's, fire and rescue capabilities.	Incorporated in EMP
Eunice Fire and Rescue	7.4.2	Same as above needs to be modified to include Monument, NM Fire Department.	Incorporated in EMP
Lea Regional Medical Center		No comments at this time.	
City of Eunice, Police Dept.	7.4.3	Even though the Eunice Police Department is not listed as a backup agency in case of an emergency we would make our officers available, if requested.	Incorporated in EMP
Hobbs Fire Department	7.3.1	Redacted – Security related information.	1. 2. 3.
Hobbs Fire Department	7.3.4	What level of training/certification does your HAZMAT team possess?	40 Hours Initial 24 Hours Yearly
Hobbs Fire Department	7.4.2	Hobbs Fire Department, in addition to fire and rescue, has a fully equipped HAZMAT response vehicle with 19 fully trained HAZMAT technicians, and all other personnel are Operations/OPS Decontamination certified.	Incorporated in EMP
Hobbs Fire Department	7.4	Remove Hobbs Fire and Rescue and replace with Hobbs Fire Department.	Incorporated in EMP
Hobbs Fire Department	7.4.1	Remove Hobbs Fire and Rescue and replace with Hobbs Fire Department.	Incorporated in EMP

SUMMARY OF COMMENT RESOLUTION (Continued)

Reviewing Organization	Section	Comment	Resolution
Hobbs Fire Department	7.4.2	Remove Hobbs Fire and Rescue and replace with Hobbs Fire Department	Incorporated in EMP
Hobbs Fire Department	7.4.2	Class rating of -4. What is this rating?	Insurance Service Office (ISO) Class Rating of 4. – Incorporated in EMP
Hobbs Fire Department	7.4.2	Remove Eunice Fire Department, replace with Monument Volunteer Fire. Monument is adjacent/adjoining response coverage area.	Incorporated in EMP
NMDHSEM	6.3	Change reference to Office of Emergency Management (OEM) to NM Department of Homeland Security and Emergency Management	Incorporated in EMP
NMDHSEM	7.3.10	Clarify level of employee first aid training.	Clarification incorporated in EMP (Basic first aid and CPR)
NMDHSEM	7.3.13	5 th bullet – what type of respirator protection?	Respiratory protection assigned according to specific hazard – no change to EMP, bullet remains as “Dons appropriate personal protective equipment.”
NMDHSEM	7.4	Change agency name to reflect NM DHSEM	Incorporated in EMP
NMDHSEM	7.4	Change agency name to reflect NM DHSEM (4 th paragraph)	Incorporated in EMP
NMDHSEM	7.4.3	Add reference to NM Hazardous Material Emergency Response Plan.	Incorporated in EMP
NMDHSEM	8.2.2	5 th bullet change agency name to reflect NMDHSEM	Incorporated in EMP
NMDHSEM	8.4.2	3 rd paragraph change agency name to reflect NMDHSEM	Incorporated in EMP
NMDHSEM	9.2.1.3	2 nd bullet change agency name to reflect NMDHSEM	Incorporated in EMP

8.3 REFERENCES

- CFR, 2009 Title 10, Code of Federal Regulations, Section 40.31(j), "Application for Specific Licenses," 2009.
- NRC, 1992 U.S. Nuclear Regulatory Commission, "Standard Format and Content of Emergency Plans for Fuel Cycle and Materials Facilities," Regulatory Guide 3.67, NRC, 1992.
- NRC, 2010 U.S. Nuclear Regulatory Commission, "Standard Review Plan for the Review of a License Application for a Fuel Cycle Facility," NUREG-1520, Revision 1, NRC, 2010.