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February 18, 1986

Mr. M. P. Phillips
 U. S. Nuclear Regulatory Commission
 Region III
 799 Roosevelt Road
 Glen Ellyn, IL 60137

Dear Mr. Phillips:

Docket 50-305
 Operating License DPR-43
 Kewaunee Nuclear Power Plant
 Emergency Preparedness - Potential Conflicts
 Between NRC and FEMA Guidelines

This letter is written to express our concern for the written contents of the FEMA Guidance Memorandum PR-1, "Policy on NUREG 0654/FEMA-REP-1 and 44 CFR 350 Periodic Requirements." The most disturbing point about guidance memorandum PR-1 is the apparent conflicts with 10 CFR 50, Appendix E, section F.3(3) and 44 CFR 350.9(c)(4), without any indication that the appropriate legislative procedures were followed to revise these regulations.

For example, on the topic of exercises which test the capability of States within ingestion exposure pathway to fully exercise their emergency plans, Guidance Memorandum PR-1 (Page 2) reads as follows:

Attendant Criteria

Implicit in evaluation criterion, N.l.b., is the requirement for each State which has a nuclear power plant within its borders to fully exercise its plans and preparedness related to ingestion exposure pathway measures at least once every six years in conjunction with a plume exposure pathway exercise for some site. This requirement is reflected in the 35 exercise objectives and is presented in 44 CFR 350.9(c)(4). Each State with ingestion exposure pathway responsibilities for two or more sites located within its borders will fully participate at the other sites once every six years. A State which

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has ingestion related responsibilities for a site(s) located within its borders and which is also within the 50-mile ingestion exposure pathway of a site(s) located in a bordering State(s), shall partially participate in all of the ingestion related exercises for those bordering State site(s). For those States that do not have a power plant located in its borders, but are located within the 50-mile Emergency Planning Zone of a bordering State's power plant, they should fully participate in a least one exercise over a six-year period and partially participate in all others. These ingestion-related requirements represent revision of provisions contained in both NUREG-0654/FEMA-REP-1 and 44 CFR 350.9 (c)(4).

Guidance Memorandum PR-1 states that a six-year cycle is acceptable instead of 5 year cycle as written in 10 CFR 50 and 44 CFR 350. The last sentence states that this guidance constitutes a revision to not only NUREG-0654/FEMA-REP-1 but also 44 CFR 350.9(c)(4). There is no reference to the status of the legal process initiated to change 44 CFR 350.9(c)(4) and 10 CFR 50 nor any indication that the NRC agreed to a revision of NUREG 0654/FEMA-REP-1.

Another area of concern lies in the area of a change to the definition of time frame to meet the after hours exercise guideline of NUREG 0654/FEMA-REP-1. The guidance memorandum changes the wording in NUREG-0654 from, "Each organization should make provisions to start an exercise between 6:00 p.m. and midnight and another between midnight and 6:00 a.m.," to "Each organization should make provisions to start an exercise between 6:00 p.m. and 4:00 a.m." FEMA seems to have taken the philosophy of changing guidelines and giving these guidelines significant weight without apparent coordination or mutual agreement of the NRC nor comment from the general public.

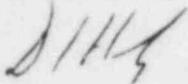
As you will recall at the January 16-17, 1986 meeting sponsored by FEMA in Chicago, FEMA warned states that repeal of their 44 CFR 350 approvals would be possible if they did not meet the guidance in PR-1. If this should happen the utility is automatically involved. To emphasize our precarious position I would like to quote from a NRC letter to Wisconsin Electric Power Company dated May 16, 1985. The cover letter signed by Mr. C. J. Paperiello, which forwarded the FEMA evaluation of the 1984 exercise at the Point Beach Nuclear Plant, reads as follows:

"We fully recognize that the recommendations to be implemented may involve actions by other parties and political institutions which are not under your direct control. Nonetheless, we would expect the subject of offsite preparedness for the area around the Point Beach and Kewaunee Nuclear Power Plants to be addressed by you as well as others."

In summary we are very concerned over the apparent lack of coordination between the national levels of the NRC and FEMA on emergency preparedness guidelines. It is our strong belief that NUREG-0654/FEMA-REP-1 should be reviewed as necessary to incorporate current philosophy and that this philosophy be incorporated into regulations in a timely manner.

Mr. M. P. Phillips
February 18, 1986
Page 3

Sincerely,



D. C. Hintz
Manager - Nuclear Power

DRS/jks

cc - Mr. J. G. Keppler, US NRC - Region III
Mr. Robert Nelson, US NRC
Mr. William Snell, US NRC
Mr. R. S. Cullen, PSCW
Mr. George Lear, US NRC



Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

January 28, 1986

MEMORANDUM FOR: Assistant Associate Director
Office of Natural and Technological Hazards

ATTENTION: Robert Wilkerson

FROM: Frank Finch, Chief *Frank Finch*
Natural and Technological Hazards Division

SUBJECT: REP Training Conference - Followup Issues

I would like to thank you for arranging the attendance of Don Kirwan and Marshall Sanders at our January 16-17 REP Training Conference. Don's presentation was quite interesting and informative and several of the attendees noted afterward that they thought the information would be useful during the next update of their public information brochures. Following the session, we were able to schedule one-third of our sites for a technical assistance visit.

I would especially thank Marshall for his contribution to the conference. Being a FEMA HQ policy person, he was continuously "under fire" from the conference participants. I believe that the input from Marshall and the opportunity for direct contact by State and utility planners with FEMA HQ was the most significant positive aspect of the conference.

As I am sure Marshall has informed you, there were several issues identified during the conference that require a policy level decision by FEMA HQ. I have attempted to identify these issues in a series of questions and comments which I have enclosed. I have made a commitment to the exercise participants to followup on these issues and provide them with FEMA HQ response to the questions. To this end, I would appreciate your review of the issues raised and a response to the specific questions. I will ensure that the information you provide is appropriately distributed within Region V.

In the interim, I am going to provide a response to the questions raised in the November 27 and 29, 1985 letters from the State of Wisconsin. This response will be based in part on the information provided to me by Marshall during the conference. I will coordinate this response with Marshall.

If you wish to discuss further the conference or the issues raised, please feel free to contact Wally Weaver of my staff. I look forward to your response to these questions.

Enclosure

cc: Marshall Sanders

REP Training Conference Issues
January 16-17, 1986

1. Bring State organizations more directly into the review process. This could be accomplished by distributing draft documents to the States thru the Regions and increasing review time to 45 - 60 days.
2. There needs to be a more "visible interface" between FEMA and NRC as to the coordination which occurs prior to FEMA issuance of guidance documents. The perception of States and utilities is that FEMA is initiating and implementing activity unilaterally.
3. Continuing this idea, some of the guidance issued by FEMA is in apparent conflict with regulation (e.g. GM PR-1 vs NUREG-0654 vs 10-CFR-50). NRC HQ needs to issue a formal concurrence when FEMA guidance is at odds with NRC regulation. (The problem is that FEMA tends to "enforce" guidance while NRC "dismisses" an issue by saying "Don't worry about it . . . it's only guidance.")
4. Of the seven areas included in the letter of certification called for in GM PR-1, only two certifications are specifically required by NUREG-0654. The States feel that the reporting requirements of the certification letter creates a burden for them. The States acknowledge that the requirements are being met and would be willing to provide a certification statement without the documentation.
5. The States and utilities would like the "clock to start" in 1983 for the accomplishment of the 35 objectives. They feel that FEMA is holding them to requirements they were unaware of at the time if we "start the clock" in 1980 or 1981. Will exemptions (blanket and/or case-by-case) be possible? (This may be more of a philosophical problem rather than an operational one. FEMA V review has indicated that most of the 35 objectives have been met throughout the years although the means for accomplishing them has "evolved" over the same period. The biggest area remaining is ingestion which is discussed below.)
6. Can the States and locals, as appropriate, "transfer" credit for an objective from one site to another when the objective is generic in nature? This is done to some extent when State exercise weaknesses from a full participation exercise are corrected at the next full participation exercise which is usually for a different NPP site.
7. Can exercises initiated between 4 A.M. and 6 A.M. be grandfathered in as qualifying for an off-hours exercise as defined in GM PR-1? (Note: This is an area where NRC and FEMA use different standards. NRC still holds the utility to "6 P.M. to 12 A.M." and "12 A.M. to 6 A.M.")
8. The States take exception to the need to conduct unannounced exercises because:
 - "real life" response represents unannounced exercising since mobilization, notification and activation of facilities are the key issues being demonstrated.

- local resources would be readily available for "real life" response but must be preplanned for exercises. The cost and volunteer status of many emergency workers make unannounced exercises impractical.

There are several related issues. What will FEMA's reaction be if a State refuses to conduct an unannounced exercise? What will NRC's reaction to FEMA's reaction be? (Does HR 3038 apply?)

9. Exercising in different seasons raises similar issues.

- weather cannot be controlled therefore different seasons may not produce the desired result.
- State and locals demonstrate the ability to handle "seasonal variations" on a day-to-day basis throughout the year.
- many of the activities which are sensitive to "seasonal variations" are tabletop simulation anyway.

The related questions in #8 above apply here too.

10. Are the requirements associated with ANS to be handled on a calendar year basis or on the anniversary date? Based on GM PR-1, we feel that they are on a calendar year basis.

11. Training -

- short notice for RERO course (NV) causes loss of allocation in October or November for some States. The allocation from Headquarters must be out sooner or no courses early in the FY.
- the curriculum of some NETC courses is expanded to fill the time available. Perhaps courses should be condensed.
- likewise attendees are recruited to fill the course and are sometimes inappropriate to the content.
- a refresher/advanced RERO course should be developed perhaps keying on Recovery/Reentry and Ingestion issues.
- specific comments about the radiological series courses will be provided by the States - direct contact with Joe LeFleur of NETC was encouraged. (Region V will forward all comments received.)

12. The States (and utilities) would like an opportunity to review a draft of GM IN-1 before it is finalized.

13. The key issue with respect to ingestion pathway exercises is the magnitude of the effort required. Also many of the criteria (e.g. sampling, analysis, dose projection, PAR's, some communications) have direct transferability from inhalation pathway exercises. The level of effort must be defined.

14. The States and utilities would like a copy of the after action report for the Beaver Valley tabletop exercise which is scheduled for publication in mid-March. (Region V will ensure distribution if provided with a copy suitable for reproduction.)



Federal Emergency Management Agency

Region V 300 South Wacker, 24th Floor, Chicago, IL 60606 (312) 353-1500

February 5, 1986

Mr. David Speerschneider
Director, Bureau of Plans
and Preparedness
Division of Emergency Government
P.O. Box 7865
Madison, Wisconsin 53707

Dear Mr. Speerschneider:

This is in response to your letters of November 27 and 29, 1985 wherein you asked several questions concerning GM PR-1 and GM IN-1 (draft). Please note that this letter reflects the information as presented during our recent REP Training Conference in Chicago. A letter to FEMA HQ which addresses the issues identified by State and utility representatives at the conference has been prepared and was forwarded to you under separate cover. If the information in this letter is modified as a result of FEMA HQ response to the issues letter, I will immediately notify you.

How can November 3, 1980, be used to begin the six-year compliance period for meeting all exercise objectives when these objectives were not clearly identified or used until November 1983?

The six-year cycle begins with the first joint exercise conducted after the effective date (11/3/80) of the NRC rule, 10 CFR 50. The starting date is linked to the NRC rule because this is the initial origin of the requirement for conducting periodic, joint exercises. The date of the publication of the 35 exercise objectives was August 5, 1983. This is also the effective date for their use. These objectives simply clarify and express in functional terms the demonstrable requirements contained in NUREG-0654/FEMA-REP-1 which was published in November 1980. FEMA Region V is currently reviewing the exercises conducted to date to determine which of the 35 objectives have yet to be successfully demonstrated for each site. This information will be provided to you in the very near future. At that time we can mutually assess the impact of the various starting dates.

When will final guidance be completed for ingestion pathway planning? How can the six-year compliance period for ingestion planning and exercising begin in 1980 when draft guidance for ingestion plans were not published until April 5, 1985?

The final guidance should be completed by July 1986. Because of major technical revisions to the initial draft document, FEMA HQ will consider forwarding a new draft to the Regions and States for review and comment. States will be held accountable for only those requirements where Federal guidance has been provided. Assuming that operative guidance on ingestion pathway measures is not provided to States in sufficient time for them to develop and implement, only the general evaluation criteria contained in NUREG-0654/FEMA-REP-1 would be used by FEMA to evaluate their exercise performance. Three documents which contain "guidance" concerning the evaluation of ingestion pathway exercise objectives were included in the followup conference materials sent to you under separate cover. These materials should be useful for the development of ingestion pathway exercise scenarios.

Will an off-hour exercise have to be conducted with each plant during the six-year period?

Yes, an off-hour exercise will have to be conducted with each plant during the six-year period. State and local governments should have in-place policies and procedures that address the issue of overtime pay, comp time, etc. for emergency workers for use not only with exercises, but actual disasters and emergencies. The scheduling of exercise time frames can be adjusted so as to preclude significant burdens on volunteers. In most cases, moreover, volunteers would probably be more receptive to exercises conducted outside their normal work hours so they would not have to miss work. Capabilities to effect shift changes are critical for any prolonged emergency response to an accident; therefore; it is necessary to demonstrate this capability.

Will an unannounced exercise have to be conducted with each plant during the six-year period?

Yes, an unannounced exercise will have to be conducted with each plant at least once during the six-year-period. The intent of this requirement is to test the capabilities of exercise players to carry out their emergency responsibilities in an exercise that approximates the conditions of an actual radiological emergency. However, this requirement does not negate the need for advance planning for the development of exercises. Its intent is simply to restrict knowledge of the exercise date, scenario, events and play to non-exercise players such as exercise controllers.

Is there a need for exercises to be held during different seasons over the six-year period?

The intent of this requirement in NUREG-0654/FEMA-REP-1 is to assure that State and local governments have the capability to mobilize emergency response personnel and carry out emergency functions under all types of weather conditions. The contention from the State of Wisconsin that this capability is often demonstrated in response to winter snow storms through the clearing of roads has merit. Also, the contention that this requirement poses scheduling problems because of linkages between exercise scheduling and fuel loading needs to be more carefully examined. Accordingly, we have asked FEMA HQ to reassess the need for this requirement. In the meantime, if a State seeks an exemption from this requirement under 44 CFR 350.9(c), the Region will promptly process it to FEMA HQ for consideration.

Do the requirements of PR-1 apply to host counties? When will formal criteria be developed for host county plans and exercise objectives? Which exercise objectives are state objectives, which are risk county objectives, and which are host county objectives?

The key to determining which counties must meet the requirements of PR-1 is to examine the specific State and local emergency plans for a particular site. Whatever exercise objectives are incorporated in an organization's plan must be exercised. While the terminology of "host" and "at risk" counties is not used in NUREG-0654/FEMA-REP-1, PR-1 or any other FEMA REP guidance, we assume that these terms are being used to distinguish between those organizations in the plume exposure EPZ and those that are not. Counties located outside of the plume pathway EPZ's are not required, under any NRC or FEMA regulations or guidance, to develop emergency plans. However, where local governments outside the plume EPZ have entered into agreements with State or local governments within the plume EPZ to provide services and/or facilities, they could be expected to participate in exercises in which these services and/or facilities are involved in the exercise objectives.

Will off-hour exercises conducted under earlier guidance be "grandfathered" in? For example, will the March 1985 Zion exercise count as an off-hour exercise? That exercise started before 6:00 a.m. to comply with the then existing draft guidance but the final guidance says an off-hour exercise must begin before 4:00 a.m.

Any off-hour exercises that were conducted in compliance with the previous guidance (i.e., NUREG-0654/FEMA-REP-1) during this six-year period will be grandfathered.

In Memorandum PR-1, paragraph number 3 of the Attendant Criteria of Evaluation Criterion N.l.b. lists several requirements for exercising ingestion plans. Which of these requirements apply to Wisconsin?

Two of the three conditions set forth in item 3 apply to the State of Wisconsin. First, since Wisconsin has three sites located within its border, the State will have to fully participate in the ingestion aspects of an exercise at some site once every six years and partially participate at the other sites within the same six-year period. Second, since Wisconsin has ingestion-related responsibilities for three sites located outside of its border, the State will have to partially participate in ingestion-related exercises for those sites whenever the host State conducts such exercises.

Do local units of government have to develop and exercise ingestion plans? Memorandum PR-1 says that generally local units of government do not have to develop an ingestion plan while Memorandum IN-1 indicates the requirement for ingestion planning at the local level.

As stated in GM PR-1, States have the primary responsibility for developing and testing ingestion pathway measures. However, it is recognized that in some States, local governments are vested with ingestion-related responsibilities. In such cases, they would be expected to exercise these measures in conjunction with the States.

Doesn't the Annual Letter of Certification (ALC) requirement duplicate reporting requirements under the Comprehensive Cooperative Agreements (CCA)?

This requirement may necessitate duplicative reporting on the same radiological program activities such as drills. Because of this potential conflict, the Offices of Natural and Technological Hazards Programs and Emergency Management Programs within the State and Local Programs and Support Directorate are considering this proposal: Where State and local governments have to report to FEMA on the same activities through their CCA's and the REP program, they may report on these activities through their ALC's and simply reference the ALC report in their CCA report. In the meantime, if an organization is involved in an activity for which it must submit information in both CCA and ALC reports, then it may report on this activity in the CCA report and simply reference the CCA report in the ALC.

I hope this information will facilitate your implementation of the various REP program requirements. As noted above, I will keep you informed of FEMA HQ response to the issues identified during our conference. If you have any questions please do not hesitate to contact me.

Sincerely,



Wallace J. Weaver, Chief
Technological Hazards Branch

cc: Marshall Sanders

DEC 02 1985



State of Wisconsin Department of Administration

DIVISION OF EMERGENCY GOVERNMENT

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November 27, 1985

Mr. Wallace Weaver, Chief
Technological Hazards Branch
Federal Emergency Management Agency-Region V
300 South Wacker Drive - 24th Floor
Chicago, IL 60606

Dear Mr. Weaver:

After reviewing the final version of Guidance Memorandum PR-1, Policy on NUREG-0654/FEMA-REP-1, and 44 CFR 350 Periodic Requirements, I foresee several problems in implementing the memorandum.

It was particularly disappointing to note that the final memorandum indicates the six-year period begins with the first joint (utility, state, and local government) exercise conducted after November 3, 1980, the effective date of 10 CFR Part 50, and not with the date of the first exercise conducted for 350 approval which would begin the six-year period after September 28, 1983, the effective date of 44 CFR Part 350, as indicated in the draft version of the memorandum dated April 24, 1985.

I believe that the six-year period should begin with the first exercise conducted for 350 approval for the following reasons. The years 1979 to 1983 was a period of experimentation in the development and implementation of the Radiological Emergency Planning (REP) Program. During those years, guidance from FEMA and plan development and exercising by the utilities, states, and local units of government were in a formative stage. FEMA and the states were learning how to write plans and how to conduct exercises. The period was marked by a number of changes in FEMA guidance and by a lack of uniformity in the FEMA Regions in reviewing plans, evaluating exercises, and preparing interim findings.

It was not until the last half of 1983 that FEMA began to become more consistent in its approach to the REP Program. Several key documents mark this beginning. Dave McLoughlin's August 3, 1983 memorandum to the FEMA Regional Directors introduced several important changes in the procedures all FEMA Regions were to use in reviewing radiological emergency plans and for observing, evaluating, and reporting on REP exercises. The memorandum introduced the modular format for observing exercises and the list of 35 exercise objectives cross-referenced to specific NUREG items and portions of the exercise observation modules. The final publication of 44 CFR Part 350 on September 28, 1983, provided for the regulation of the development of policies and procedures for review and approval by FEMA of state and local radiological emergency response plans and preparedness. On February 16, 1984, FEMA issued

Mr. Wallace Weaver
November 27, 1985
Page Two

Revision 1 to Guidance Memorandum 17 in an effort to bring further uniformity in preparing for and conducting exercises. These three documents mark the beginning of a truly concentrated effort by FEMA to bring uniformity and consistency to REP planning and exercising throughout the FEMA Regions and makes the publication of 44 CFR Part 350 a logical time at which to begin meeting the periodic requirements.

If November 3, 1980 remains the date that the "clock" starts, Wisconsin will not be able to satisfy the six-year requirement pertaining to ingestion pathway exercises because FEMA has yet to issue final guidance for ingestion planning and exercising. It was not until April of 1985 that FEMA issued a draft of guidance for the ingestion pathway. In light of the lack of uniformity and inconsistency which accompanied the development of plume exposure pathway planning guidance, it is only reasonable for the states to await final guidance before attempting to write formal plans for the ingestion pathway EPZ.

Memorandum PR-1 indicates that local governments are not usually required to develop and test ingestion plans while the draft form of Guidance Memorandum IN-1, The Ingestion Pathway, notes the responsibilities of state and local governments to take protective actions and lists a number of approaches through which the planning requirements can be satisfied. Until FEMA clarifies the nature and degree of involvement of state and local units in ingestion pathway planning, it will be difficult to develop ingestion plans which can be exercised and evaluated in a consistent manner. In Wisconsin, there are 33 counties which would be involved in planning for the ingestion pathway. If final guidance were available at this time, I would project at least a two-year period to complete ingestion planning for those counties. Furthermore, it will be impossible to begin ingestion planning until at least 1986, because we are currently involved in a major revision of the State's Emergency Management Plan.

I also question the requirement to conduct exercises during different seasons of the year in order to have the possibility of exercising under seasonally different weather conditions. How can a workable exercise schedule of this type be reached in Region V, given the large number of plants in the region? The current exercise schedule is closely tied to the plants' refueling schedule, and has only recently developed to the point where exercises fit realistically into the schedules of all the organizations involved in the program. Major rearrangement of the exercise schedule may result in severe scheduling problems. Furthermore, I question the necessity of this requirement. The major concern with weather problems in this part of the country center around snow and related transportation problems. Each winter, every jurisdiction in Wisconsin demonstrates its ability to keep transportation routes open.

Mr. Wallace Weaver
November 27, 1985
Page Three

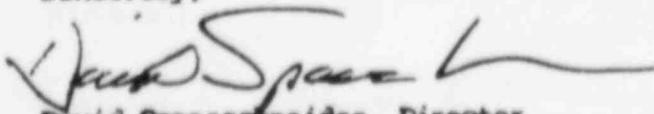
If winter weather conditions were so severe that snow plows could not be sent out, an evacuation could not be carried out, and protective actions would consist of sheltering in-place. This requirement should either be eliminated or the routine removal of snow could be viewed as a separate drill conducted in support of nuclear power plant exercises.

In its present form, the requirement to conduct unannounced exercises makes little sense. How can any exercise be unannounced when planning for that exercise begins 120 days in advance? Knowing that the exercise will take place within a particular seven-day timeframe does not make the exercise unannounced. This only inconveniences the state and local units of government by introducing uncertainties and interruptions in their normal work schedules for one week instead of one day. We and all other parties involved, recognize that this is not a genuine test of our ability to respond. Moreover, it is highly disruptive of day-to-day state and county activities and would be very damaging to the cooperative rapport toward the exercise process which has been built up over a number of years. This requirement should be eliminated.

In summary, I question the validity of several of the requirements. Further, I foresee great difficulty in meeting a six-year timeframe, beginning November 3, 1980 for successfully completing the 35 exercise/planning objectives which were not spelled out prior to August, 1983. If more realistic solutions cannot be found for several of the issues I have raised, I also question the advisability of trying to meet these standards and wonder how FEMA and NRC would respond to a determination not to comply.

I hope that we can have FEMA's response to these concerns and that they can be discussed at the exercise scheduling meeting being planned for January in Chicago. Under separate cover, I will send you a list of questions related more specifically to Wisconsin which I hope you can answer.

Sincerely,



David Speersonneider, Director
Bureau of Plans and Preparedness

DS:jlr:1116C

cc: Tom Alt, Deputy Secretary, Dept. of Administration
Rick Anthony, FEMA, Battle Creek
Region V States
Garrett Nielsen
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November 29, 1985

Mr. Wallace J. Weaver, Chief
Technological Hazards Branch
Federal Emergency Management Agency
300 South Wacker Drive, 24th Floor
Chicago, IL 60606

Dear Mr. Weaver:

As indicated in my letter of November 27, 1985, here are some questions which Guidance Memorandums PR-1, Periodic Requirements and IN-1, The Ingestion Pathway have raised. These questions touch on several planning and exercise activities.

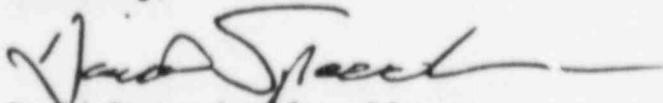
1. How can November 3, 1980 be used to begin the six-year compliance period of all exercise objectives when the objectives were not clearly identified or actually used for exercise evaluation until November, 1983?
2. When will final guidance be completed for ingestion pathway planning? How can the six-year compliance period for ingestion planning and exercising begin in 1980 when draft guidance for ingestion plans were not published until April 5, 1985?
3. Will an off-hours exercise have to be conducted with each plant during the six-year period?
4. Will an unannounced exercise have to be conducted with each plant during the six-year period?
5. Do the requirements of Memorandum PR-1 apply to host counties?
6. When will formal criteria be developed for host county plans and exercise objectives?
7. Will off-hours exercises conducted under earlier guidance be "grandfathered" in? For example, will the March 1985 Zion exercise count as an off-hours exercise? That exercise started before 6:00 a.m. to comply with the then existing draft guidance but the final guidance says an off-hours exercise must begin before 4:00 a.m.

November 29, 1985
Mr. Wallace J. Weaver, Chief
Page Two

8. Which exercise objectives are state objectives, which are risk county objectives, and which are host county objectives?
9. In Memorandum PR-1, paragraph number 3 of the Attendant Criteria of Evaluation Criterion N.l.b. list several requirements for exercising ingestion plans. Which of these requirements apply to Wisconsin?
10. Do local units of government have to develop and exercise ingestion plans? Memorandum PR-1 says that generally local units of government do not have to develop an ingestion plan while Memorandum IN-1 indicates the requirement for ingestion planning at the local level.

If you believe, as we do, that these questions would be of interest to all Region V states, we request that they be discussed at the upcoming regional scheduling meeting in Chicago on January 16-17.

Sincerely,



David Speerschnieder, Director
Bureau of Plans and Preparedness

DF:JR:lll6C

cc: Tom Alt, Deputy Secretary, Department of Administration
Garrett Nielsen
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Rick Anthony, Federal Emergency Management Agency, Battle Creek
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