

Indian Point 3
Nuclear Power Plant
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914 736 8000

CONSOLIDATED EDISON COMPANY
OF NEW YORK, INC.
INDIAN POINT STATION
BROADWAY & BLEAKLEY AVENUES
BUCHANAN, NY 10511



November 14, 2000
IPN-00-080
NL-00- 139

Docket Nos. 50-03, 50-247, and 50-286
Indian Point Nos. 1, 2 and 3
License Nos. DPR-5, DPR-26, DPR-64

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

**SUBJECT: Indian Point's Emergency Planning
Interface with State and County Authorities**

Dear Sir:

This letter is in response to your inquiries concerning activities at the Indian Point Units that involve Emergency Planning related interfaces with state and county authorities. Both Indian Point Units maintain routine, ongoing interfaces with government authorities with responsibility for Emergency Response. Those interfaces are summarized in the attachments provided with this letter.

Indian Point's involvement with the state and county emergency management organizations includes both drill and non-drill related activities. Indian Point often functions as a single entity during interactions with offsite agencies. To that extent, when major activities such as FEMA evaluated biennial exercises or Ingestion Pathway exercises are scheduled, both licensees are actively involved in planning and training for the activity as well as execution. Together, the Indian Point staffs routinely meet with offsite agencies, conduct training of offsite personnel and coordinate other emergency planning (EP) related activities. The site EP staffs are located in the same building and work closely together to implement the site emergency planning requirements.

A number of facility, equipment and process related areas are identical between the licensees. These similarities result in Indian Point/offsite authority interactions being essentially the same when implementing emergency response, regardless of which licensee is the initiator of a drill or event.


Attachment I contains drill related activities conducted during the past five years. Attachment II contains non-drill related activities over the same period of time. Information regarding shared facilities, equipment and processes is provided in Attachment III.

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Both licensees intend to continue activities similar to those described in the attachments to this letter. Indian Point Units 2 and 3 commit to docketing information related to state and county interface activities every two years. This commitment is only in effect while the units are operated by separate licensees.


Should you or your staff have any questions, please contact Mr. Frank Inzirillo of the Indian Point Unit 2 staff at (914) 271-7418 or Ms. MaryAnn Wilson of the Indian Point Unit 3 staff at (914) 736-8404.

Very truly yours,



Robert J. Barrett
Site Executive Officer
Indian Point 3 Nuclear Power Plant

Very truly yours,



James Baumstark
Vice President Nuclear Engineering
Consolidated Edison Company
Of New York, Inc.

Attachments

cc: next page

cc: Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
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King of Prussia, Pennsylvania 19406-1415

Mr. George Wunder, Project Manager
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Mr. Pat Milano, Project Manager
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U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point 3 Nuclear Power Plant

U.S. Nuclear Regulatory Commission
Resident Inspectors' Office
Indian Point Station
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Mr. Glenn Tracy, Branch Chief
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U.S. Nuclear Regulatory Commission
11555 Rockville Pike
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INDIAN POINT DRILL RELATED ACTIVITIES

Activities	Notes	1996	1997	1998	1999	2000
FEMA Exercise	1	<u>IP3</u> : 4/10		<u>IP2</u> : 6/24		<u>IP3</u> : 11/15
Ingestion Pathway Exercise	2				<u>IP2</u> : 5/25 - 5/28	
NRC Graded Exercises	3	<u>IP2</u> : 9/25 <u>IP3</u> : 4/10	<u>IP2</u> : 11/19 <u>IP3</u> : 10/29	<u>IP2</u> : 6/24 <u>IP3</u> : 12/9	<u>IP2</u> : 9/22 <u>IP3</u> : 7/1	<u>IP2</u> : 6/1 <u>IP3</u> : 11/15
On-Site Training Drills	3	<u>IP2</u> : 5/15, 9/11 9/18 <u>IP3</u> : 2/22, 3/20 5/30, 7/17 10/23	<u>IP2</u> : 4/9, 11/12 12/3 <u>IP3</u> : 2/26, 5/7, 9/10, 12/10	<u>IP2</u> : 5/13, 6/10, 10/28 <u>IP3</u> : 2/25, 4/8, 7/14, 10/21, 12/9	<u>IP2</u> : 3/10, 9/15, 9/8, 12/1, 12/8, 12/15 <u>IP3</u> : 2/24, 3/18, 4/28, 7/1, 9/1, 11/16	<u>IP2</u> : 2/9, 2/23, 3/21, 3/30, 5/10, 5/24, 8/16, 11/2, 11/9, <u>IP3</u> : 2/2, 4/12, 9/20, 10/11, 11/1
FEMA Hospital Drills	4	Westchester and Putnam Counties	Orange and Rockland Counties	Westchester and Putnam Counties	Orange and Rockland Counties	Westchester and Putnam Counties
2/15/00 ALERT at IP2	5					<u>IP2</u> : 2/15

NOTES:

1. When one licensee hosts the two (2) year FEMA exercise, the other licensee is involved in the following activities:
 - Scenario preparation
 - Meetings with state, county and FEMA personnel to develop extent of play document
 - Conduct of training at Reception Centers, Congregate Care Centers, and County Emergency Operations Centers
 - Observation of Out of Sequence Exercises
 - Provide controllers and observers for the exercise

2. The 1999 Ingestion Pathway Exercise was hosted by Unit 2 for a three (3) day period.

Unit 2 and Unit 3 personnel were involved in planning and execution. The exercise included staffing of the State and County Emergency Operations Centers (EOC) with dose assessment and communications personnel. In addition, Unit 2 technical advisors were dispatched to the county and state EOCs.

3. These drills, at a minimum, include initial and follow-up notification of state and counties. Additional involvement includes staffing of the Joint News Center (JNC), staffing of state and county EOC's, PAR's decision making, and state and county participation at the EOF. However, additional involvement is not consistent and is not well documented.
4. Hospital Drills, which are evaluated by FEMA, are conducted twice a year with alternating counties each year. Both Unit 2 and 3 are involved in the planning and execution of the drills.
5. The Unit 2 ALERT on February 15, 2000 met the requirements for a partial participation exercise. All county EOCs were manned and in communication with the Indian Point Emergency Operations Facility. Unit 3 supported this event by providing technical advisors to the counties as well as the post critique and assessment of the event.

INDIAN POINT NON-DRILL RELATED ACTIVITIES

Activities	Notes	1996	1997	1998	1999	2000
EAL Training	1	annual	annual	annual	annual	annual
Full Scale Siren Test	2	semi-annual	semi-annual	semi-annual	semi-annual	semi-annual
Field Monitoring Team Training	1	annual	annual	annual	annual	annual
Dose Assessment Training	1	annual	annual	annual	annual	annual
Meetings with state and counties	3	quarterly	quarterly	quarterly	quarterly	quarterly
Communication System Tests	4	monthly	monthly	monthly	monthly	monthly
Y2K Preparations	5				various tests	

NOTES:

1. Training in various topics, as indicated in the table, is conducted by Indian Point personnel at each of the four counties and the state. The training effort is shared by both Units 2 and 3. In many instances, when one licensee actually conducts the training, the other is also present.
2. Full scale siren tests are conducted twice a year. Both licensees participate in coordination and are present in each of the counties' EOCs during the test.
3. A coordination meeting is held quarterly between the four counties and the state emergency management office. Both licensees attend. Topics such as industry lessons learned, drill lessons learned, and drill schedules are discussed.
4. Communication System tests assure primary and backup communication systems for notifying state and county authorities are working. Tests are participated in by both licensees and include establishing contact with state and county warning points as well as EOCs.
5. Throughout 1999, coordination and planning for Y2K contingencies involved interaction between licensees, state and county officials. This included the installation and testing of a satellite phone system between the site, state and county EOCs.

SHARED FACILITIES, EQUIPMENT AND PROCESSES

Facilities:

- **Emergency Operations Facility:** Units 2 and 3 share the same Emergency Operations Facility. To that extent, state and county liaison response is the same regardless of which licensee is conducting an exercise.
- **Joint News Center:** Units 2 and 3 share the same Joint News Center. To that extent, state and county public information officer response is identical regardless of which licensee is conducting the exercise.

Equipment:

- **Radiological Emergency Communications System (RECS):** Both licensees utilize the identical communication system for initial and follow-on notification of state and counties. The system is jointly tested by both licensees on a monthly basis jointly. In addition, the Local Government Radio backup to the RECS is also tested.
- **Meteorological Information Data Acquisition System (MIDAS):** This system is shared by both licensees. It is the system that transmits meteorological data and radiation levels around the site to the state and county EOCs.
- **Reuter Stokes:** This is a system of sixteen (16) radiation detectors surrounding the Indian Point site that is shared by both licensees. The information from this system is transmitted to state and county EOCs.
- **State/County Hot Line:** This phone is a dedicated Hot Line connecting the four county executives, the state and the Indian Point EOF. Both licensees utilize the same phone system.
- **Alert Notification System:** The 154 sirens surrounding the Indian Point site, along with the actuation system are the same for both units.

Processes:

- **Notification Process:** Both licensees utilize the same notification form to contact the state and counties regarding emergency classifications.
- **Emergency Action Level Scheme:** The EAL scheme for both licensees was developed as a joint effort. With the exception of some initiating event criteria, the EALs are basically the same. EAL training for the counties is identical regardless of which unit conducts the training. A common EAL reference manual exists for both units.

- **Protective Action Recommendations (PAR) Methodology:** The 10 and 50-mile Emergency Planning Zones (EPZs) are identical for both units, as well as the Emergency Response Planning Areas (ERPAs). Criteria for protective action is based on the same EPA guidance for both licensees. Both units recommend a 2-mile radius and a 2 to 5-mile down wind evacuation at the General Emergency.
- **Dose Assessment Methodology:** Dose assessment methods are the same for both units as well as the state and counties.

Commitments made to the NRC

Number	Commitment	Due
IPN-00-080 NL-00-139	Indian Point Units 2 and 3 commit to docketing information related to state and county interface activities every two years. Note: This commitment is only in effect while the units are operated by separate licensees.	NRC: ongoing