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December 30, 2003

Mr. Hubert J. Miller U.S. Nuclear Regulatory Commission NRC Region I 475 Allendale Road King of Prussia, PA 19406-1415

Dear Mr. Miller:

Please find enclosed five copies of the Final Exercise Report for the James A. FitzPatrick NPS Plume Exposure Pathway Exercise conducted on June 3, 2003.

The State of New York and local emergency response organizations successfully demonstrated the capabilities to implement their off-site radiological emergency response plans and procedures, based on the evaluation of this exercise by the Regional Assistance Committee and a team of Federal evaluators. There were no deficiencies and three Areas Requiring Corrective Actions identified.

Please find attached plan issues identified during the exercise. In addition, please note that the Regional Assistance Committee is currently reviewing the state and local plans and will provide its suggestions for improvement under separate cover when this review is completed.

The State and local preparedness is adequate to protect the health and safety of the public living in the vicinity of the James A. FitzPatrick NPS and provide reasonable assurance that appropriate measures can be taken offsite in the event of a radiological emergency.

If you have any questions regarding this matter, please contact Robert F. Reynolds, Chair of the Regional Assistance Committee at (212) 680-3621.

Sincerely yours,

Joseph F. Picciano

Acting Regional Director

Enclosures

J. A. FitzPatrick Nuclear Power Station Planning Issues Identified at the June 3, 2003 Exercise

Oswego County Backup Route Alerting (Actual)

Condition: The maps provided to the deputy showed the area affected by the siren failure, including all the roads, but did not have a defined route for route alerting. This meant the deputy had to take time to figure out a route and also had to make certain that all roads had been included in this route. This slowed down the alerting process.

Possible Cause: No routes have been designated.

Reference: NUREG-0654 E.6; Appendix 3.B.2.c

Effect: Could cause failure to provide route alerting in a timely manner (45 minutes) if there were a siren failure.

Recommendation: Maps should be updated to include a defined route with clear indications of a starting point, the route to follow, and an end point.

Host County Reception Center Issue - 1

Condition: The demonstrated initial monitoring process was slower than that specified in the plan. The times needed to process the six evacuees in three lanes were 77, 80 and 79 seconds, respectively.

Possible Cause: Getting evacuees into and out of the portal monitors exceeded the 5 seconds specified in the plans.

Reference: NUREG-0654, J.12

Effect: Using the times demonstrated the three portal monitors could process 9,885 evacuees or, if the fourth instrument was in service, 13,180 could be processed in a 12-hour period. Based on current population figures for the 10-mile EPZ, the planning basis would be approximately 12,340 potential evacuees.

Recommendation: Repair and include the 4th portal monitor in the documentation in the plan, Procedure 3, Section 2.3, and revise the scan time to what was demonstrated (about 13 seconds per person).

Host County Reception Center Issue - 2

Condition: Some of the activities demonstrated are currently not documented in the plan of record. The following specific actions are currently not documented in the plan:

Uncontaminated evacuees are stamped Clean at the portal monitors.

Successfully decontaminated evacuees were not stamped with the Clean indication as they exited the decontamination areas as specified in the plan. Instead they were stamped Clean after they exited the additional portal monitor.

There is no procedural step to assure the portal monitors meet the FEMA Standard by checking to verify that the monitors' alarm when a 1 uCi Cs-137 is held in the center of the frame.

There is no provision for providing a receipt for the specific contaminated articles taken from evacuees.

The plan states (Procedure 3, Section 3-4) that KI will be made available to evacuees and the "Clean Monitoring Log" contains a space for "KI Accepted" while there is no KI shown on the inventory in Appendix B or Procedure 10.

Possible Cause: Failure to document current practices.

Reference: NUREG-0654, J.12

Effect: While the activities were adequate and appropriate, there is no assurance that in future activations of this center the same processes will be used.

Recommendation: Revise plan to document demonstrated practices.



Final Exercise Report

J.A. FITZPATRICK NUCLEAR POWER PLANT

Licensee:

Entergy

Exercise Date:

June 3, 2003

Report Date:

December 22, 2003

DEPARTMENT OF HOMELAND SECURITY FEDERAL EMERGENCY MANAGEMENT AGENCY REGION II

26 Federal Plaza New York, New York 10278

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I. EXECUTIVE SUMMARY

On June 3, 2003, an exercise was conducted in the 10-mile Plume Exposure Pathway Emergency Planning Zone (EPZ) around the FitzPatrick Point Nuclear Power Plant by the Federal Emergency Management Agency (FEMA), Region II. The purpose of the exercise was to assess the level of State and local preparedness in responding to a radiological emergency. This exercise was held in accordance with FEMA's policies and guidance concerning the exercise of State and local radiological emergency response plans (RERPs) and procedures.

The most recent exercise at this site was conducted on December 4, 2001. The qualifying emergency preparedness exercise was conducted on September 15, 1981.

FEMA wishes to acknowledge the efforts of the many individuals in New York, and Oswego and Onondaga Counties who participated in this exercise.

Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. Cooperation and teamwork of all the participants were evident during this exercise.

This report contains the final evaluation of the biennial exercise and the evaluation of the following out-of-sequence activities: School Interviews (Oswego City School District on May 28, 2003; Mexico School District, Mexico Middle School and Oswego County BOCES on May 30, 2003); School Bus Evacuation (Oswego School District on May 28, 2003; Mexico Academy and Central Schools on May 30, 2003); Special Population Bus Run (CNY Centro on May 28, 2003); Reception Center (NY State Fairgrounds on May 29, 2003); Congregate Care Centers (Red Cross Interview on June 2, 2003); and Medical Drill (Facilities portion, Syracuse University Hospital on December 13, 2002 and Transportation portion, Oswego County Highway Garage on June 3, 2003).

The State and local organizations, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Deficiencies and three (3) Areas Requiring Corrective Action (ARCAs) identified as a result of this exercise. In addition, corrective actions were demonstrated for three (3) prior ARCAs that were closed.

II. INTRODUCTION

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

FEMA Rule 44 CFR 350 establishes the policies and procedures for FEMA's initial and continued approval of State and local governments' radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on State and local governments' participation in joint exercises with licensees.

FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- Taking the lead in offsite emergency planning and in the review and evaluation of RERPs and procedures developed by State and local governments;
- Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:
 - U.S. Department of Commerce,
 - U.S. Nuclear Regulatory Commission,
 - U.S. Environmental Protection Agency,
 - U.S. Department of Energy,
 - U.S. Department of Health and Human Services,
 - U.S. Department of Transportation,
 - U.S. Department of Agriculture,
 - U.S. Department of the Interior, and
 - U.S. Food and Drug Administration.

Representatives of these agencies serve on the FEMA Region II Regional Assistance Committee (RAC), which is chaired by FEMA.

Formal submission of the RERPs for the Nine Mile Point and James A. FitzPatrick Nuclear Power Plants (JAFNPP) to FEMA Region II by the New York State and involved local jurisdictions occurred on July 15 1981. Formal approval of the RERPs was granted by FEMA on February 1, 1985, under 44 CFR 350.

A REP exercise was conducted on June 3, 2003 by FEMA Region II to assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving the Nine Mile Point Nuclear Power Plant. The purpose of this exercise report is to present the exercise results and findings on the performance of the offsite response organizations (ORO) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the FEMA Region II RAC Chairperson, and approved by the Regional Director.

The criteria utilized in the FEMA evaluation process are contained in:

- NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980;
- "Radiological Emergency Preparedness: Exercise Evaluation Methodology," published in the *Federal Register* on September 12, 2001, and revised April 25, 2002, and contained in the *Interim REP Program Manual* (August 15, 2003)

Section III of this report, entitled "Exercise Overview," presents basic information and data relevant to the exercise. This section of the report contains a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

Section IV of this report, entitled "Exercise Evaluation and Results," presents detailed information on the demonstration of applicable exercise objectives at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. This section also contains: (1) descriptions of all Deficiencies and ARCAs assessed during this exercise, recommended corrective actions, and the State and local governments' schedule of corrective actions for each identified exercise issue and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs' efforts to resolve them.

III. EXERCISE OVERVIEW

Contained in this section are data and basic information relevant to the December 4, 2001, exercise to test the offsite emergency response capabilities in the area surrounding the Nine Mile Point Nuclear Power Plant. This section of the exercise report includes a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

A. Plume Emergency Planning Zone Description

The area within the Nine Mile Point/James A. FitzPatrick site is located on Lake Ontario and in Oswego County. Oswego County is predominantly rural in nature with approximately 75 percent of its total land acres consisting of woodland, wetlands, and inactive agricultural land. Although active agriculture land only accounts for 16 percent of the local land acres, agriculture is the major land use in the county. The major agriculture activity in Oswego County is dairy, accounting for approximately 63 percent of the value of all farm products produced in the county. The major harvested crops are hay, alfalfa, and corn. The major livestock animals are cattle and hogs.

The 10-mile EPZ contains a total population of 41,284 (2000 Population Estimates). The Nine Mile Point Nuclear Power Plant site is located seven miles to the northeast of the city of Oswego and thirteen miles north of the city of Fulton. Aside from these two areas of population concentration, the region is sparsely populated.

The industrial activities within the 10-mile EPZ are confined principally to the metropolitan area within the city of Oswego, with little industry in the outlying communities of Scriba, Minetto, Volney and Mexico. Manufacturing firms directly account for 33 percent of the total employment of Oswego County.

The public institutions, aside from the schools and churches, within the EPZ of the site are a hospital, a college, and a jail. There are also a number of special facilities located within the 10-mile EPZ.

Continuing urban and industrial expansion of the area will increase both the population and the amount of land used for residential and commercial purposes. It is anticipated that the population in the region will increase by about 30 percent in the next twenty years, with larger increases in the urban areas.

B. Exercise Participants

The following agencies, organizations, and units of government participated in the Nine Mile Point Nuclear Power Plant exercise on December 4, 2001.

NEW YORK STATE

New York State Emergency Management Office

New York State Department of Health

New York State Police

New York State Department of Environmental Conservation

New York State Department of Transportation

New York State Department of Labor

New York State Department of Aging

New York State Department of Agriculture and Markets

New York State Thruway Authority

New York State Parks, Recreation and Historic Preservation

New York State Correction Services

New York State Office of Mental Health

New York State Office of Fire Prevention and Control

New York State Department of Education

New York State Department of Energy

New York State Public Service Commission/Dept. of Public Service

New York State Division of Military and Naval Affairs

New York State Office of Cyber Security and Critical Infrastructure Organization

RISK JURISDICTIONS

OSWEGO COUNTY

Oswego County Sheriff's Department

Oswego County Department of Public Works

Oswego County Office of Emergency Preparedness

Oswego County Chairman of the Legislature

Oswego County Information Technology

Oswego County Personnel Department

Oswego County Administration

Oswego County Administrative Services

Oswego County Department of Social Services

Oswego County Department of Social Welfare

Oswego County Highway Department

Oswego County Superintendent of Schools

Oswego County Department of Health

Oswego County Fire Coordinators

Oswego County Attorney

Oswego County Promotion and Tourism

Oswego County Probation Department

Oswego County Planning Department

Oswego County Assembly Office

Oswego County Emergency Medical Services

Oswego County Communication Center - 911

Cooperative Extension

New York State Emergency Management Office

New York State Police

New York State Department of Health

New York State Assembly

New York State Department of Environmental Conservation

BOCES Schools

SUPPORT JURISDICTIONS

Town of Palermo Fire Department

City of Oswego

City of Fulton

Fulton Police Department

Onondaga County Emergency Management Office

Onondaga City Emergency Management Office

Cooperative Extension

Oswego County School District

Mexico Central School District

PRIVATE/VOLUNTEER ORGANIZATIONS

American Red Cross

RACES

New York Power Authority - James A. FitzPatrick Nuclear Power Plant

Entergy - James A. FitzPatrick Nuclear Power Plant

Constellation Energy Corporation – Nine Mile Point Nuclear Power Plant

WSYR Radio Station, Syracuse

Volunteer Data Analysis

Pioneer Land Search and Rescue

Centro of Oswego Bus Company

C. Exercise Timeline

Table 1, on the following pages, presents the time at which key events and activities occurred during the James A. FitzPatrick Nuclear Power Plant exercise on June 3, 2003. Also included are times that notifications were made to the participating jurisdictions/functional entities.

Table 1. Exercise Timeline

DATE AND SITE: December 4, 2001 – NINE MILE POINT NUCLEAR POWER PLANT

	Time	Angeres (1997)	Time T	hat Notification Was	Received or Action W	as Taken	
	Utility Declared	NY State EOC	State Warning Point	EOF	JNC	EAS Station WSYR	OCEOC
Unusual Event	7:26 AM	7:34 AM	7:34 AM	N/A	N/A	N/A	7:34 AM
Alert	8:48 AM	8:58 AM	8:58 AM	N/A	8:59 AM	N/A	8:58 AM
Site Area Emergency	11:13 AM	11:28 AM	11:28 AM	11:14 AM	11:15 AM	N/A	11:27 AM
General Emergency	12:43 PM	12:55 PM	12:55 PM	12:48 PM	12:50 PM	N/A	12:55 PM
Simulated Rad. Release Started	N/A	12:55 PM	12:55 PM	12:56 PM	12:26 PM	N/A	12:15 PM
Simulated Rad. Release Terminated	N/A	N/A	N/A	4:15 PM	N/A	N/A	3:10 PM
Facility Declared Operational	N/A	9:55 AM	9:55 AM	9:37 AM	9:37 AM	N/A	9:44 AM
County Declaration of State of Emergency	N/A	N/A	N/A	10:34 AM	10:06 AM	N/A	10:06 AM
Exercise Terminated	N/A	4:16 PM	4:16 PM	4:15 PM	N/A	N/A	2:50 PM
1 ST A + N Sequence - "Heads U	Jo"	N/A	N/A	N/A	N/A	N/A	11:23 AM
1st Siren Activation		N/A	N/A	N/A	N/A	N/A	11:34 AM
1st EAS Message.		N/A	N/A	11:37 AM	11:37 AM	11:37 AM	11:37 AM
Protective Action Decision#1 Shelter: Remaining Evacuate: 1, 2, 3, 4, 5, 7, 9, 10,	+ KI for 26, 27 evacuees	1:11 PM	1:11 PM	1:14 PM	N/A	N/A	1:11 PM
2nd Siren Activation		1:22 PM	1:22 PM	1:32 PM	N/A	N/A	1:22 PM
2nd EAS Message		1:25 PM	1:25 PM	1:32 PM	1:25 PM	N/A	1:25 PM
Protective Action Decision#2 Shelter: Remaining Evacuate: Add 8, 14, 15, 16, 17	+ KI for , 18 evacuees	1:47 PM	1:47 PM	1:59 PM	N/A	N/A	1:47 PM

Time	Time That Notification Was Received or Action Was Taken											
Utility Declared	NY State EOC	State Warning Point	EOF	INC	EAS Station WSYR	OCEOC						
3rd Siren Activation	1:58 PM	1:58 PM	1:59 PM	N/A	N/A	1:58 PM						
3rd EAS Message	2:01 PM	2:01 PM	1:59 PM	1:25 PM	N/A	2:01 PM						
KI Administration Decision: Emergency Workers	12:55 PM	12:55 PM	1:26 PM	N/A	N/A	1:13 PM						

LEGEND: S-Support Jurisdiction D - Decision Making Jurisdiction A - Activating Jurisdiction NA - Not Applicable N/O - Not Observed

IV. EXERCISE EVALUATION AND RESULTS

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the June 3, 2003 exercise to test the offsite emergency response capabilities of State and local governments in the 10-mile EPZ surrounding the J.A. FitzPatrick Nuclear Power Plant.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of criteria contained in the September 12, 2001 Federal Register Notice (revised April 25, 2002) and in the Interim REP Program Manual (August 15, 2003). Detailed information on the exercise criteria and the extent-of-play agreement used in this exercise are found in Appendix 3 of this report.

A. Summary Results of Exercise Evaluation - Table 2

The matrix presented in Table 2, on the following page(s), presents the status of all exercise criteria that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status of those objectives is indicated by the use of the following letters:

- M Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior exercises)
- D Deficiency assessed
- A ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)
- N Not Demonstrated (Reason explained in Subsection B)

Exercises Blank - Not Scheduled for Demonstration	A - ARCA(s) Assessed or Unresolved ARCA(s) from Prior
---	---

Traffic Control Points	Route Alerting	School Interviews	Medical Drill	Personnel Monitoring Center	Special Population Evacuation	Congregate Care	Reception Center	School Bus Evacuation		1	Field Monitoring Team - Blue	Dose Assesment	EOC	Oswego County			<u>FitzPatrick NPS</u> June 3, 2003
L		Ш							Z	Z	Z		S		1a1	M	Mobilization
L				Ш					Z				M		161	ARG.	Facilities
L													X		1c1	EMERGENCY OPNS MANAGEMENT	Direction & Control
									Z	Z	Z	L	Μ		1d1	<u> </u>	Communications Equipment
									Z	Μ	Μ	Μ	Μ		1e1	S	Equipment & Supplies to Support Operations
												M	Μ		2a1	-p	Emergency Worker Exposure Control
												M	×		261	ROT RC	Rad Assmt PARs Based on Avail Information
Γ													Z		2b2	SION	Rad Assmt PADs for General Public
Г	Γ												Z		2b1 2b2 2c1 2d1 2e1 3a1 3b1 3c1 3c2	PROTECTIVE ACTION DECISION-MAKING	Prot Action Decisions for Special Population's
T															2d1	X C	Rad Assmt & Decision Making for Ingest Exposure
Г				Γ											2e1	Z	Rad Assmt & Dec Making for Relo/Re-entry/& Return
Z	Z		≤	Z	M		Z	Z		Z	Z	Z	Z		3a1	PRO	Implementation of Emergency Wrkr Exposure Control
Z	3		Z	Z	M	Г	⊳	Z		Z	≤	3	Z	1	3b1]]] [Implementation of KI Decision
					Z								Z		3c1	PROTECTIVE ACTION	Implementation of PADs for Special Population's
	T	Z						Z					Z			Ą	Implementation of PADs for Schools
3	1												Z		3d1		Implementation of Traffic Access & Control
T		T	Γ					Γ				Γ	Z		d1 3d2	ON IMPLEMENTATION	Impediments to Evac & Traf are Identified & Resolved
		Τ	T			Г			Γ			T	Γ		3e1	EME	Implementation of Ingestion Pathway Decisions
	T	Τ	F			Γ					T		Γ	1	3e2	N N	Impl of IP Decisions Show Strat & Instr Material
	T			<u> </u>		Γ				Γ	Ī				311]	Impl of Relocation/Re-entry/Return Decisions
	T	T	Γ	T	T			T		≤	Z		T	1	4a1	<u> </u>	Plume Phase Measurement & Analysis Equip
	T	1	T	T	T	T	T	T	1	T		3				FIELD MEASUREMENT	Plume Phase Field Measurement & Analysis Mgmt
	T	T	T	T		T	T	T	T	3			T		4a2 4a3	& ANALYSIS	Plume Phase Fld Measurements & Analysis Proced
	T	T	T	 	\dagger	T	T	T	T	T		T	T	1	461	YSIS	Post Plume Phase Field Measurements & Samplinç
	\dagger	\dagger	\dagger	\vdash	\dagger	T	T	T			T	T	1	1	4c1	SE	Laboratory Operations
	\dagger	T	\dagger	\dagger	\vdash	Ħ	T	\dagger	\dagger		\vdash	╁	3		5a1		
十	T	\dagger	\dagger	╁	H	\vdash	十	t	\dagger		T	+	T	1	1 5a2	PUBLIC	Activation Prompt Alert & Notif 15 Min (Fast Breaker)
+	 ≥	+	T	+	t	T	+	-	t	T	T	\dagger	s	:	2 5a3	IC INFO	Activation Prompt Alert & Notif in Exception Areas
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+	+	+	+	3	+-	T	f	+	+	\dagger	T	+	╁			PNF	Monitoring & Decon of Emerg Worker Equipment
-	+	+	╁	ť	+	╘	+	\dagger	\dagger	\dagger	\dagger	+	-	1	6b1 6c1	OPN/FACILITI	Temporary Care of Evacuees
	\dagger	\dagger	3	+	\dagger	f	t	\dagger	\dagger	十	T	\dagger	\dagger	1	6d1		Trans & Treatment of Contam Injured Individuals

Blank - Not Station Prior Exercises Assert & Decision Making for Ingest Exposure Control Implementation of RI Decision Making for Ingest Exposure Control Implementation of RI Decision Implementation of RID Decision RID Decision Implementation of RID Decision RID Dec	M - Met (No Deficiency or ARCA(s) Assessed and no Unre N - Not Demonstrated as Scheduled (Reason Explained in Blank - Not Scheduled forf Demonstration or Not Assigned				EOF	EAS Station	Joint News Center	Dose Assessment	EOC	NEW YORK STATE OPS			<u>FitzPatrick NPS</u> 3-Jun-03
Section IV.B) Tacility/Function Rad Assmt PADs for General Public Prot Action Decisions for Special Population's Rad Assmt & Decision Making for Ingest Exposure Rad Assmt PADs for Special Population's Implementation of Emergency Wrkr Exposure Control Implementation of FADs for Special Population's Implementation of Ingestion Pathway Decisions Implementation of Ingestion Pathway Decisions Implementation of Ingestion Pathway Decisions Plume Phase Measurement & Analysis Equip Plume Phase Field Measurement & Analysis Proced Post Plume Phase Field Measurements & Sampling Laboratory Operations Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activation Prompt Alert & Notification Activat	۵(s) duled	-	\vdash	+	7		7		٧	-	12	ш	Mobilization
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B. Status of Jurisdictions Evaluated

This subsection provides information on the evaluation of each participating jurisdiction and functional entity, in a jurisdiction-based, issues only format. Presented below is a definition of the terms used in this subsection relative to objective demonstration status.

- Met Listing of the demonstrated exercise objectives under which no
 Deficiencies or ARCAs were assessed during this exercise and under which
 no ARCAs assessed during prior exercises remain unresolved.
- **Deficiency** Listing of the demonstrated exercise objectives under which one or more Deficiencies were assessed during this exercise. Included is a description of each Deficiency and recommended corrective actions.
- Area Requiring Corrective Actions Listing of the demonstrated exercise
 objectives under which one or more ARCAs were assessed during the current
 exercise or ARCAs assessed during prior exercises remain unresolved.
 Included is a description of the ARCAs assessed during this exercise and the
 recommended corrective action to be demonstrated before or during the next
 biennial exercise.
- Not Demonstrated Listing of the exercise objectives which were not demonstrated as scheduled during this exercise and the reason they were not demonstrated.
- Prior ARCAs Resolved Descriptions of ARCAs assessed during previous exercises that were resolved in this exercise and the corrective actions demonstrated.
- Prior ARCAs Unresolved Descriptions of ARCAs assessed during prior exercises that were not resolved in this exercise. Included is the reason the ARCA remains unresolved and recommended corrective actions to be demonstrated before or during the next biennial exercise.

The following are definitions of the two types of exercise issues that are discussed in this report.

• A **Deficiency** is defined in the *Interim REP Program Manual* (August 15, 2003) 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."

• An ARCA is defined in the *Interim REP Program Manual* (August 15, 2003) as "...an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety."

FEMA has developed a standardized system for numbering exercise issues (Deficiencies and ARCAs). This system is used to achieve consistency in numbering exercise issues among FEMA Regions and site-specific exercise reports within each Region. It is also used to expedite tracking of exercise issues on a nationwide basis.

The identifying number for Deficiencies and ARCAs includes the following elements, with each element separated by a hyphen (-).

- Plant Site Identifier A two-digit number corresponding to the Utility Billable Plant Site Codes.
- Exercise Year The last two digits of the year the exercise was conducted.
- **Objective Number** A two-digit number corresponding to the objective numbers in FEMA-REP-14.
- Issue Classification Identifier (D = Deficiency, A = ARCA). Only Deficiencies and ARCAs are included in exercise reports.
- Exercise Issue Identification Number A separate two (or three) digit indexing number assigned to each issue identified in the exercise.

1. STATE OF NEW YORK

1.1 New York State Emergency Operations Center (EOC)/State Emergency Coordination Center

- **a. MET:** 1.a.1; 1.c.1; 1.d.1; 1.e.1; 2.a.1; 2.b.1; 2.b.2; 2.c.1; 3.c.1; 5.a.1; 5.b.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

1.2 New York State Accident Assessment (AA)

- a. MET: 1.e.1; 2.a.1; 2.b.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

1.3 Emergency Operations Facility (EOF)

- **a. MET:** 1.a.1; 1.b.1; 1.c.1; 1.d.1; 1.e.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE

- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE
- 1.4 Joint News Center (JNC)
 - **a. MET:** 1.a.1; 1.b.1; 1.c.1; 1.d.1; 1.e.1; 5.a.1
 - b. **DEFICIENCY:** NONE
 - c. AREAS REQUIRING CORRECTIVE ACTION: ONE

Issue No.: 24-03-5.b.1-A-01

Condition: There were three EAS messages prepared for notification of the public. The first was actually read over the telephone and recorded at the station. The activator read messages # 2 and 3, simulating contact with the radio station. However, message #2, which contained the first PAD, took over two minutes (2 minutes and fifteen seconds to be exact) to read. Therefore, the concluding portion of this message would not have been broadcast, since it exceeded 2 minutes, the maximum message length allowed by the EAS system.

Possible Cause: Messages are too long and/or are read too slowly.

Reference: NUREG-0654, E.5

Effect: The public would not hear a complete message and information needed to implement protective actions such as evacuation, sheltering or to take KI.

Recommendation: Prepare condensed pre-scripted EAS messages that can be broadcast in two minutes (120 seconds).

d. **NOT DEMONSTRATED:** NONE

e. PRIOR ARCAs - RESOLVED: TWO

Issue No: 40-01-12-A-02

Condition: Failure to issue follow up news releases to correct inconsistencies on previous news releases disseminated by different organizations.

Information on one organization's latest news release was not always consistent with information of another organization's latest news release. For example, the last news release from Constellation Energy issued at 1226 indicated that a radiation release was in progress. One minute earlier at 1225. Oswego County issued a news release confirming an EAS message broadcast at 1219 indicating that a radiation release was not in progress. These were the last news releases issued by both organizations during the exercise. At the time of the Oswego County news release, the Constellation Energy public information staff at the JNC had informed the Oswego public information staff at the JNC that a radiation release was underway. Because the radiation release had not been confirmed by the County EOC, the JNC public information staff issued the news release without updated information. The exercise was terminated at 1421, a period of almost two hours from the release of the conflicting messages. The Oswego County public information staff (at the JNC and the Oswego County EOC) did not take adequate steps to resolve the conflict of information during this time. Since the Public Inquiry staff uses these news releases and since all media at the JNC may not have heard comments by the Oswego County spokesperson during the media briefing, there remains the possibility that incorrect information could be provided to the public and media representatives.

Corrective Action Demonstrated: News release were developed by the county (7), the State (3), utility (5), and the NRC (4). Information contained in the News Releases was accurate, consistent and timely.

Issue No: 40-01-12-A-03

Description: The Oswego County Plan incorporates the requirements of Nine Mile Point" Joint News Center Procedures and Public Education Work Plan." This procedure requires that all news releases be "... faxed to the respective Emergency Operations Centers and the Emergency

Operations Facility." The news releases generated by the State of New York were prepared in Albany, NY and e-mailed to the JNC for release. The State news releases were distributed within the JNC, but were not faxed to the County EOC and EOF as required. All news releases prepared by Constellation Energy and by Oswego County were faxed to all emergency facilities as required. The lack of the State news releases in the EOF and County EOC has the potential to cause inconsistency of information released by all three organizations.

Corrective Action Demonstrated: News Releases were provided to the media and to the public and media inquiry staff and the NRC upon their arrival, all located within the Joint News Center. They were also faxed to Entergy (EOF), the State Emergency Operations Center (EOC) and State Public Information Officer (PIO), the Oswego County EOC, and NRC Headquarters and Region I.

f. PRIOR ARCAs - UNRESOLVED: NONE

1.5 EAS Radio Station (WSYR)

- **a. MET:** 5.a.1; 5.b.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: ONE

Issue No.: 24-03-1.d.1-A-02

Condition: There is no reliable back-up communication system to the land-line telephone.

Possible Cause: At one time there was a two-way radio system. Now there are several cell phones and in addition almost all of the staff have personal cell phones. However, there is no cell phone that stays at the station or in the newsroom permanently.

Reference: NUREG-0654, F.1

Effect: If telephone lines were inoperable, there would be no way to reach the EAS station to send out a message.

Recommendation: Backup communications must be established at the newsroom on a permanent basis as part of the nuclear emergency equipment, and the information should be included in the Oswego County and Joint News Center plans and procedures.

- d. **NOT DEMONSTRATED:** NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

2. OSWEGO COUNTY

2.1 Oswego County Warning Point (WP)

- **a. MET:** 1.a.1; 1.b.1; 1.d.1; 1.e.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

2.2 Oswego County Emergency Operation Center (EOC)

- **a. MET:** 1.a.1; 1.b.1; 1.c.1; 1.d.1; 1.e.1; 2.a.1; 2.b.1; 2.b.2; 2.c.1; 3.a.1; 3.b.1; 3.c.1; 3.c.2; 3.d.1; 3.d.2; 5.a.1; 5.a.3; 5.b.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. **NOT DEMONSTRATED:** NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED:

2.3 Oswego County Accident Assessment (AA)

- **a. MET:** 1.e.1; 2.a.1; 2.b.1; 3.a.1; 3.b.1; 4.a.2
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE

- d. NOT DEMONSTRATED: NONE
- d. ARCAs RESOLVED: ONE

Issue No: 40-01-7-A-04

Description: The staff produced a comprehensive printout from the EDAMS projections that showed the calculated isotopic mixture in the projected plume. The radionuclide mixture shown was technically impossible. The staff did not question this result.

Corrective Action Demonstrated: The dose assessment staff carefully reviewed the output of the dose projection computer code. They verified that there was no anomalous data and that the projected isotopic composition of the plume was reasonable.

f. PRIOR ARCAs - UNRESOLVED: NONE

2.4 Oswego County Radiological Field Monitoring Teams

- **a. MET:** 1.a.1; 1.d.1; 1.e.1; 3.a.1; 3.b.1; 4.a.1; 4.a.3
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. **NOT DEMONSTRATED:** NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

2.5 Oswego County Personnel Monitoring Center

- **a. MET:** 3.a.1; 3.b.1; 6.a.1; 6.b.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE

- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

2.6 Oswego County Traffic Control Points

- **a. MET:** 3.a.1; 3.b.1; 3.d.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. **NOT DEMONSTRATED:** NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE

2.7 Oswego County Route Alerting (June 4, 2003)

- **a. MET:** 3.a.1; 3.b.1; 5.a.3
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE
- 2.8 Oswego County School Interviews (City of Oswego, Kingsford Elementary School May 28, 2003; Mexico School District, Mexico Middle School May 30, 2003; Oswego County, BOCES May 30, 2003)

- a. MET: 3.c.2
- b. **DEFICIENCY**: NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. **NOT DEMONSTRATED:** NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE
- 2.9 Oswego County School Bus Evacuation (Oswego School District May 28, 2003; Mexico Academy and Central Schools May 30, 2003)
 - **a. MET:** 3.a.1; 3.b.1; 3.c.2
 - b. **DEFICIENCY:** NONE
 - c. AREAS REQUIRING CORRECTIVE ACTION: NONE
 - d. NOT DEMONSTRATED: NONE
 - e. PRIOR ARCAs RESOLVED: NONE
 - f. PRIOR ARCAs UNRESOLVED: NONE
- **2.10 Special Population Bus Runs** (CNY Centro, Inc.- May 28, 2003)
 - **a. MET:** 3.a.1; 3.b.1; 3.c.1
 - b. **DEFICIENCY**: NONE
 - c. AREAS REQUIRING CORRECTIVE ACTION: NONE
 - d. NOT DEMONSTRATED: NONE
 - e. PRIOR ARCAs RESOLVED: NONE

f. PRIOR ARCAs - UNRESOLVED: NONE

2.11 Onondaga County Reception Center – NY State Fairgrounds (May 29, 2003)

- **a. MET:** 3.a.1
- b. **DEFICIENCY:** NONE
- d. AREAS REQUIRING CORRECTIVE ACTION: ONE

Issue No.: 24-03-3.b.1-A-03

Condition: The informational materials provided by the nurses at the Clean Monitoring Log Desk contained conflicting information with regard to dosage of KI for children. The vendor data indicates that babies under one year old should be given ½ a tablet (or 65 mg), while the NYS DOH Information for the Public sheet indicates that for children over one month to 3 years should be given ¼ tablet (32 mg) and for infants from birth to one month 1/8 tablet (16 mg). The NYS DOH document explains how to prepare a 16 mg dose.

Possible Cause: Inaccurate information in the vendors material.

Reference: NUREG-0654, J.10.e

Effect: Confusion in the population with regard to dosage.

Recommendation: Discontinue distribution of the vendor information since almost all of the other information is contained in the State DOH informational sheet.

- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE
- 2.12 Oswego County Congregate Care Centers Red Cross Interview (June 2, 2003)

- a. MET: 6.c.1
- b. **DEFICIENCY:** NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ARCAs RESOLVED: NONE
- f. PRIOR ARCAs UNRESOLVED: NONE
- **2.13 Oswego County Medical Drill** (Facilities: Syracuse University Hospital, Syracuse, NY, December 13, 2002; Transportation Oswego County Highway Garage, June 3, 2003)
 - **a. MET:** 3.a.1; 3.b.1; 6.d.1
 - b. **DEFICIENCY:** NONE
 - c. AREAS REQUIRING CORRECTIVE ACTION: NONE
 - d. NOT DEMONSTRATED: NONE
 - e. PRIOR ARCAs RESOLVED: NONE
 - f. PRIOR ARCAs UNRESOLVED: NONE

APPENDIX 1

ACRONYMS AND ABBREVIATIONS

The following is a list of the acronyms and abbreviations used in this report.

AA ACP ARCA	Accident Assessment Access Control Point Area Requiring Corrective Action
CCC CFR cpm	Congregate Care Center Code of Federal Regulations Counts Per Minute
DOC DOE DOI DOT DRD	U.S. Department of Commerce U.S. Department of Energy U.S. Department of the Interior U.S. Department of Transportation Direct Reading Dosimeter
EAS ECL EEM EOC EOF EPA EPZ ERPA	Emergency Alert System Emergency Classification Level Exercise Evaluation Methodology Emergency Operations Center Emergency Operations Facility U.S. Environmental Protection Agency Emergency Planning Zone Emergency Response Planning Area
FDA FEMA FR	U.S. Food and Drug Administration Federal Emergency Management Agency Federal Register
GE GM	General Emergency Guidance Memorandum
HHS HQ	U.S. Department of Health and Human Services Headquarters
JNC	Joint News Center

ΚI Potassium Iodide

KLT K.L. Travis and Associates

NRC U.S. Nuclear Regulatory Commission

NUREG-0654 NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation

> and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November

1980

New York State NYS

Oswego County Emergency Operations Center OCEOC.

Oswego County Field Activity **OCFA OEM** Office of Emergency Management Onondaga County Field Activity OnFA ORO Offsite Response Organization

Protective Action Decision PAD Protective Action Guide PAG

PAR Protective Action Recommendation

Public Information Officer PIO **PMC** Personnel Monitoring Center

R Roentgen

Regional Assistance Committee **RAC**

Radio Amateur Civil Emergency Service RACES

Reception Center RC

Roentgen Equivalent Man REM

Radiological Emergency Preparedness REP Radiological Emergency Response Plan RERP

Roentgen(s) per hour R/h

SAE Site Area Emergency

State Emergency Coordination Center SECC State Emergency Operations Center **SEOC**

Standard Operating Procedure SOP

Total Effective Dose Equivalent TEDE

TCP Traffic Control Point

Team Leader TL

TLD Thermoluminescent Dosimeter USCG USDA

U.S. Coast Guard

U.S. Department of Agriculture

WP

Warning Point

APPENDIX 2

EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel who evaluated the Nine Mile Point Nuclear Power Plant exercise on December 4, 2001. Evaluator Team Leaders are indicated by the letters "(TL)" after their names. The organization which each evaluator represents is indicated by the following abbreviations:

FEMA - Federal Emergency Management Agency

NRC - U.S. Nuclear Regulatory Commission

FDA - U.S. Food and Drug Administration

USDA- U.S. Department of Agriculture

DOT - U.S. Department of Transportation

ICF - Consulting Firm Performing Evaluation

EVALUATION SITE	<u>EVALUATOR</u>	ORGANIZATION
Exercise Oversight	Rebecca Thomson	FEMA
STATE OF NEW YORK		
State EOC	Brian Hasemann (TL) Paul Malool (EOC/WP) Marcy Campbell (AA)	FEMA FEMA ICF
State Warning Point	Paul Malool	FEMA
EOF	Richard Barkley	NRC
Joint News Center	Mike Beeman (PAO)	FEMA
	Deborah Bell (TL)	FEMA
EAS Radio Station WSYR	Kevin Reed Sam Nelson	FEMA FEMA
EAS Radio Station WSTR	Sam Neison	PENIM
OSWEGO COUNTY		
Oswego County EOC	Joseph Keller (TL/AA) David Petta Angeles Thompson Russell Fox (WP)	ICF DOT FEMA FEMA
OSWEGO COUNTY (Cont'd)		
Field Monitoring Team A	Ronald Bernacki	FDA
Field Monitoring Team B	Jeanette Eng 30	EPA

Personnel Monitoring Center	Neil Gaeta	ICF
	CDR Thomas Mignone	PHS
Too 65 a Control Doints	Russell Fox	FEMA
Traffic Control Points		
	Sam Nelson	ICF
OUT-OF SEQUENCE EVALUAT	TIONS	•
OUI-OF SEQUENCE EVALUAT	TONS	
School Interviews (5/28/03)	Sam Nelson	ICF
School Bus Evacuation (5/28/03)	Sam Nelson	ICF
Special Population Buses (5/28/03)	Sam Nelson	ICF
Reception Center (5/29/03)	Joseph Keller	ICF
	Sam Nelson	ICF
Congregate Care Center (6/2/03)	Sam Nelson	ICF
MS-1 Medical Drill		
Facilities (12/13/02)	Brian Hasemann	FEMA
Transportation (6/3/03)	Neil Gaeta	ICF
	CDR T. Mignone	PHS
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APPENDIX 3

EXERCISE OBJECTIVES AND EXTENT-OF-PLAY AGREEMENT

EXTENT-OF-PLAY GROUND RULES

- REAL LIFE EMERGENCIES TAKE PRIORITY OVER EXERCISE PLAY.
- The Scenario Development Team will develop the free play messages. The State Controller will inject the message to the County Emergency Management Director or designee for action.
- Free play messages for Public Inquiry at the JNC will be developed by the Scenario Development Team. Rumor control messages will be injected at the JNC by a control cell to enable the public inquiry function to identify trends and false rumors.
- The State Controller will inject radiological data for any radiological field activities (Field Teams, EWPMC, Reception Center).
- The distribution and ingestion of KI for the general public and emergency workers will be simulated.
- According to REP Program Strategic Review Initiative 1.5, "During tabletop exercises, drills and other demonstrations conducted out-of-sequence from an integrated exercise, if FEMA and the offsite response organizations (ORO) agree, the FEMA Evaluator may have the participants re-demonstrate an activity that is determined to be not satisfactorily demonstrated. Immediate correction of issues in an integrated exercise is authorized only if it would not be disruptive and interrupt the flow of the exercise and affect other Evaluation Areas." This initiative is not applicable to EOC/JNC/EOF demonstrations during the June 3, 2003 exercise.

Sub-element 1.a - Mobilization

Criterion 1.a.1: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654, A.4; D.3, 4; E.1, 2; H.4)

WARNING POINTS (NYS and Oswego County)

Extent-of-Play Agreement:

- The latest revised call lists will be provided at the Federal/State evaluators briefing session the day before the exercise, if requested by FEMA. The lists will contain home and business telephone numbers and it is requested that these lists remain confidential.
- There will be <u>no</u> free play messages introduced at the Warning Points.

EOCs (NYS and Oswego County)

Extent-of-Play Agreement:

• The State Liaison will be pre-positioned in the area and will arrive at the County EOC no sooner than 30 minutes after the ALERT or greater ECL notification is received by the State. The Utility Technical Liaison assigned to the State EOC will be pre-positioned and arrive at the State EOC no sooner than 30 minutes after the ALERT or greater ECL notification.

EOF

Extent-of-Play Agreement:

• State liaisons will be pre-positioned in the area and will arrive at the EOF no sooner than 30 minutes after the ALERT or greater ECL notification is received by the State.

<u>JNC</u>

Extent-of-Play Agreement:

• State JNC Staff will be pre-positioned and arrive at the JNC no sooner than 30 minutes after the ALERT or greater ECL notification is received by the State.

Sub-element 1.b – Facilities

Criterion 1.b.1: Facilities are sufficient to support the emergency response. (NUREG-0654, H.3)

Extent-of-Play Agreement:

• Back-up power is available, but will not be activated, at the State and County EOCs.

Sub-element 1.c - Direction and Control

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible. (NUREG-0654, A.1.d; A.2.a., b.)

- The State Controller will inject free play messages to the County Emergency Management Director or designee for action.
- Public Inquiry messages will be injected at the JNC by a "control cell".

Sub-element 1.d - Communications Equipment

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations. (NUREG-0654, F.1, 2).

Extent-of-Play Agreement:

• A State Controller will inject a free play message to the County Emergency Management Director to initiate the demonstration of backup systems at/or to communicate with the SEOC, EOF, JNC, OCEOC, EWPMC, and Field Monitoring Teams.

Sub-element 1.e – Equipment and Supplies to Support Operations

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI), and other supplies are sufficient to support emergency operations. (NUREG-0654, H.7, 10; J.10.a, b, e, J.11; K.3.a)

Extent-of-Play Agreement:

• No equipment such as barriers, traffic cones, signs, etc. will be deployed to the field.

Sub-element 2.a - Emergency Worker Exposure Control

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to insure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides. (NUREG-0654, J.10.e, f; K.4)

Extent-of-Play Agreement:

• A State Controller will inject a free play message that will cause the County Radiological Officer to discuss what actions would be taken should a Field Monitoring Team's dose rate exceed the turn-back value. This will be a discussion only activity.

Sub-element 2.b. Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data, and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions. (NUREG-0654, I.8, 10 and Supplement 3).

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

Sub-element 2.b. Radiological Assessment and Protective Action Recommendations and Decisions for the Plume Phase of the Emergency

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy). (NUREG-0654, J.9, 10.f, m).

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

Sub-element 2.c - Protective Action Decisions Consideration for the Protection of Special Populations

Criterion 2.c.1: Protective action decisions are made, as appropriate, for special population groups. (NUREG-0654, J.9, J.10.d, e)

TRANSPORTATION DEPENDENT POPULATION

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

NOTIFICATION OF HEARING IMPAIRED

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

NON-INSTITUTIONALIZED MOBILITY IMPAIRED INDIVIDUALS

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

SCHOOLS

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

SPECIAL FACILITIES

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures. EVALUATION AREA 2: PROTECTIVE ACTION DECISION-MAKING

Sub-element 2.d. –Radiological Assessment and Decision-Making for the Ingestion Exposure Pathway

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria. (NUREG-0654, J.9, J.11).

Not to be demonstrated during this exercise.

 ${\bf Sub\text{-}element\ 2.e.-Radiological\ Assessment\ and\ Decision\text{-}Making\ Concerning\ Relocation,}} \\ {\bf Re\text{-}entry,\ and\ Return}$

Criterion 2.e.1: Timely relocation, re-entry, and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the ORO's plan and/or procedures. (NUREG-0654, I.10; J.9; M.1)

Not to be demonstrated during this exercise.

Sub-element 3.a - Implementation of Emergency Worker Exposure Control

Criterion 3.a.1: The OROs issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers in accordance with the plans and procedures. Emergency workers periodically and at the end of each mission read their dosimeters and record the readings on the appropriate exposure record or chart. (NUREG-0654, K.3.a, b)

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

Sub-element 3.b - Implementation of KI Decision

Criterion 3.b.1: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals is maintained. (NUREG-0654, J.10. e)

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

Sub-element 3.c - Implementation of Protective Actions for Special Populations

Criterion 3.c.1: Protective action decisions are implemented for special populations other than schools within areas subject to protective actions. (NUREG-0654, J.10.c, d, g).

EVACUATION OF TRANSPORTATION DEPENDENT POPULATION

Extent-of-Play Agreement:

- Bus companies will be interviewed prior to the June 3, 2003 exercise as per the offsite extent of play activities schedule.
- Each company will provide a dispatcher and at least 5-10% of that company's drivers needed to implement the Plan for interview.
- During the June 3, 2003 exercise, there will be initial contact with the transportation providers (telephone call) by the Transportation Coordinator. Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at the County EOC.
- There will be no actual dispatch of vehicles during the exercise.

NOTIFICATION OF HEARING IMPAIRED

- The hearing impaired list will be available for inspection at the County EOC. The list will be reviewed but not retained by the Federal evaluator. The procedures for notification will also be discussed at the County EOC.
- There will be \underline{no} actual notification of hearing impaired individuals during the exercise.

EVACUATION OF NON-INSTITUTIONALIZED MOBILITY IMPAIRED INDIVIDUALS

- The list of non-institutionalized mobility impaired individuals will be available for inspection at the County EOC. The lists will be reviewed but not retained by the Federal evaluator.
- There will be <u>no</u> actual dispatch of vehicles for transport of non-institutionalized mobility impaired individuals.
- During the exercise, there will be <u>no</u> actual contact of non-institutionalized mobility-impaired individuals identified on the list.

Sub-element 3.c – Implementation of Protective Actions for Special Populations

Criterion 3.c.2: OROs/School officials implement protective actions for schools. (NUREG-0654, J.10.c, d, g).

EVACUATION OF SCHOOL POPULATIONS

Extent-of-Play Agreement:

- Bus companies will be interviewed prior to the June 3, 2003 exercise as per the offsite extent-of-play activities schedule.
- Each company will provide a dispatcher and at least 5-10% of that company's drivers needed to implement the Plan for interview.
- During the June 3, 2003 exercise, there will be initial contact with the schools (telephone call) by the School Coordinator. Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at the County EOC.

SCHOOL INTERVIEWS

Extent-of-Play Agreement:

- Schools in the Oswego City and Mexico School Districts and BOCES will be interviewed as per the offsite extent-of-play activities schedule.
- Additional schools will be interviewed after the exercise as agreed to by Oswego County EMO, FEMA, and NYSEMO.
- All schools will interviewed using the REP Exercise Preparation Guide.

SPECIAL FACILITIES

- During the exercise, there will be initial contact with the special facilities (telephone call). Initial contacts will be actual and some follow-up contacts may be simulated. All calls will be logged at the County EOC.
- There will be no actual dispatch of vehicles to the special facilities.

Sub-element 3.d. - Implementation of Traffic and Access Control

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel. (NUREG-0654, J.10.g, j)

TRAFFIC AND ACCESS CONTROL POINTS (TCPs and ACPs)

- During the June 3, 2003 exercise, law enforcement officials will discuss how to activate TCPs/ACPs in the field at mutually agreed upon locations.
- There will be interviews of two (2) different law enforcement agencies responsible for staffing the designated TCPs/ACPs.
- Each designated law enforcement agency will provide one officer for interview.
- The TCPs/ACPs will be identified by a free play message provided by the State Controller to the County Emergency Management Director or designee.

Sub-element 3.d. – Implementation of Traffic and Access Control

Criterion 3.d.2: Impediments to evacuation are identified and resolved. (NUREG-0654, J.10.k).

IMPEDIMENTS TO EVACUATION

- The County will demonstrate the organizational ability to deal with at least two (2) impediments to evacuation.
- The State Controller in the County EOC will hand the free play messages to the County Emergency Management Director or designee for action to test the procedures for the removal of traffic impediments.
- No equipment (Barriers, Traffic cones, Signs, etc.) will be deployed to the field.
- This demonstration will <u>not</u> involve the dispatch of a police or other emergency vehicle to the scene of a simulated impediment. Initial contact of resource providers will be actual and some follow-up contacts may be simulated. All calls will be logged at the County EOC.

Sub-element 3.e – Implementation of Ingestion Pathway Decisions

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk, and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions. (NUREG-0654, J.9, 11).

Not to be demonstrated during this exercise.

Sub-element 3.e – Implementation of Ingestion Pathway Decisions

Criterion 3.e.2: Appropriate measures, strategies, and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk, and agricultural production. (NUREG-0654, J.9, 11).

Not to be demonstrated during this exercise.

Sub-element 3.f. - Implementation of Relocation, Re-entry, and Return Decisions

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented. (NUREG-0654, M.1, 3).

- A State Controller will inject a free play message at the State EOC to initiate discussions to close ARCA 32-99-29-A-01. This discussion will take place at the State and County EOC.
- This is a "no-risk" discussion for Oswego County.

Sub-element 4.a – Plume Phase Field Measurements and Analyses

Criterion 4.a.1: The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates. (NUREG-0654, H.10; I.7, 8, 9)

Extent-of-Play Agreement:

• The monitoring teams will not be suited up in anti-contamination clothing. However, the clothing will be available for inspection.

Sub-element 4.a - Plume Phase Field Measurements and Analyses

Criterion 4.a.2: Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654, H.12; I.8, 11; J.10.a)

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

Sub-element 4.a – Plume Phase Field Measurements and Analyses

Criterion 4.a.3: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media. (NUREG-0654, I.9).

FIELD MONITORING TEAMS

- The County will dispatch two (2) radiological monitoring teams. Each team will be provided with a State Controller and FEMA evaluator.
- The monitoring teams will not be suited up in anti-contamination clothing. However, the clothing will be available for inspection.
- Each team will take at least six (6) ambient radiation measurements and at least two (2) air samples. All teams must take the air samples as though they were in the presence of the plume (even teams that may not be impacted by the plume).
- The use of silver zeolite cartridges will be simulated and charcoal cartridges will be used. However, the silver zeolite cartridges will be available at dispatch point of kit.
- There will be <u>no</u> actual packaging or transport of samples to the laboratory. EOC staff will be questioned <u>only</u> regarding means of transportation of air samples to a central point and the location of the laboratory. Field teams will demonstrate how to obtain air samples during the exercise and will be questioned <u>only</u> regarding the procedures for the pick-up point of air samples.
- The RO2A and E140N do not have installed check sources. Button sources for appropriate instruments are available for inspection.

Sub-element 4.b - Post Plume Phase Field Measurements and Sampling

Criterion 4.b.1: The field teams demonstrate the capability to make appropriate measurements and to collect appropriate samples (e.g., food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making. (NUREG-0654, I.8; J.11)

Not to be demonstrated at this exercise.

Sub-element 4.c - Laboratory Operations

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions. (NUREG-0654, C.3; J.11)

Not to be demonstrated during this exercise.

Sub-element 5.a - Activation of the Prompt Alert and Notification System

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance. (10 CFR Part 50, Appendix E.IV.D & NUREG-0654, E.5, 6, 7)

- There will be <u>no actual</u> siren <u>sounding</u>, <u>no actual</u> tone alert radio <u>activation</u>, and <u>no broadcasting</u> of EAS messages. The Nine Mile Point siren system was last successfully tested on November 8, 2002. The next test is scheduled for November 7, 2003.
- Airing of at least one EAS message will be simulated with the radio station.
- Contact with the radio station for subsequent EAS messages may be simulated.
- Regular programming responsibilities of the radio station may preclude participation at the time of the issuance of the simulated EAS message.

Sub-element 5.a – Activation of the Prompt Alert and Notification System

Criterion 5.a.2: RESERVED

Sub-element 5.a - Activation of the Prompt Alert and Notification System

Criterion 5.a.3: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system. (NUREG-0654, E. 6, Appendix 3.B.2.c).

- There are no exception areas that require supplementary route alerting.
 - During the June 3, 2003 exercise, one (1) simulated siren failure will be discussed at the County EOC. The State Controller will inject a free play message regarding this siren failure to the County Emergency Management director or designee for action to test route-alerting procedures.
 - During the June 3, 2003 exercise, an interview of one law enforcement representative will be conducted at the County EOC. A vehicle capable of public notification will be available for the interview.
 - On June 4, 2003, one law enforcement representative with a vehicle capable of public notification will actually drive the route for the simulated siren failure identified during the exercise.

Sub-element 5.b - Emergency Information and Instructions for the Public and the Media

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner. (NUREG-0654, E. 5, 7; G.3.a, G.4.c).

PUBLIC INSTRUCTION AND EMERGENCY INFORMATION

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

EMERGENCY INFORMATION

Extent-of-Play Agreement:

All activities will be based on the State/County's plans and procedures as they would in an actual emergency.

PUBLIC INQUIRY

- The public inquiry function at the JNC will be staffed by at least four operators with one supervisor.
- Inject messages will indicate false or misleading information to enable the public inquiry function to identify trends and false rumors.

Sub-element 6.a – Monitoring and Decontamination of Evacuees and Emergency Workers, and Registration of Evacuees

Criterion 6.a.1: The reception center/emergency worker facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees and/or emergency workers. (NUREG-0654, J.10.h; J.12; K.5.a)

Extent-of-Play Agreement:

- The Reception Center will be demonstrated prior to the June 3, 2003 exercise as per the offsite extent of play activities schedule.
- Monitoring and Decon staff and technique will be demonstrated as follows. Staff will be provided to simulate evacuees.

One lane for vehicle monitoring with at least 1 monitor monitoring at least 2 vehicles:

One portal monitoring station monitoring at least 6 individuals;

One registration station (social services) with 2 personnel registering at least 2 individuals each;

One male and one female decon station with 2 monitors to simulate at least 1 personnel decon each;

One vehicle decon station with at least 1 monitor to simulate at least 2 vehicle decons;

Other staff will be demonstrated through the use of rosters;

The facility will be set up as it would be in an actual emergency with all route markings and contamination control measures in place with the exception that Reception Center floors will not be covered with paper/plastic.

Decontamination techniques will be simulated.

The monitoring and decontamination teams will not be suited up in anticontamination clothing. However, the clothing will be available for inspection. • Normal and back-up communications (RACES) will be tested between the Reception Center and the Oswego County EOC during the demonstration.

Sub-element 6.b - Monitoring and Decontamination of Emergency Worker Equipment

Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of emergency worker equipment including vehicles. (NUREG-0654, K.5.b).

Extent-of-Play Agreement

- The Emergency Worker Personnel Monitoring Center (EWPMC) will be demonstrated during the June 3, 2003 exercise.
- Monitoring and Decon staff and technique will be demonstrated as follows. Staff will be provided to simulate emergency workers.

One lane for vehicle monitoring with at least 1 monitor monitoring at least 2 vehicles;

One portal monitoring station to monitor at least 2 individuals;

Two personnel decon stations with at least 1 monitor each to simulate at least 2 personnel decons;

One vehicle decon station with at least 1 monitor to simulate at least 1 vehicle decon;

Other staff will be demonstrated through the use of rosters;

PMC floors will not be covered with paper/plastic;

The monitoring and decontamination teams will not to be suited up in anticontamination clothing. However, the clothing will be available for inspection.

Decontamination actions are to be simulated.

 Normal and back-up communications (RACES) will be tested between the EWPMC and the Oswego County EOC during the demonstration.

Sub-element 6.c - Temporary Care of Evacuees

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross planning guidelines (found in MASS CARE-Preparedness Operations, ARC 3031). Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities. (NUREG-0654, J.10.h, J.12).

- Congregate Care Centers will be evaluated prior to the June 3, 2003 exercise as agreed to between Oswego County EMO, FEMA and the Onondaga-Oswego Chapter of the ARC.
- Capabilities will be demonstrated through an interview process coordinated between FEMA and ARC.
- The evaluation of the capabilities will be conducted by FEMA and ARC as specified in the ARC-FEMA Memorandum of Understanding.

Sub-element 6.d - Transportation and Treatment of Contaminated Injured Individuals

Criterion 6.d.1: The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals. (NUREG-0654, F.2; H.10; K.5.a, b; L.1, 4)

- The transportation and facility component of this medical drill will be demonstrated on or before the June 3, 2003 exercise as per the offsite extent-of-play agreement schedule.
- The transportation component of this drill will end when the vehicle is ready to depart for the hospital with the patient from an offsite location. This component will be demonstrated during the June 3, 2003 exercise.
- The facility component of this drill will involve the transport of a patient from the Nine Mile Point site to University Hospital for treatment. This component was evaluated on December 13, 2002.
- The use of flashing lights and sirens for exercise play is not required.

FITZPATRICK REP EXERCISE JUNE 3, 2003

SCENARIO SYNOPSIS

TIMELINE EVENT			MESSAGE/ SUPPLEMENTAL	ISSUED TO/BY
1.	Pr	ior to start of drill – distribute Drill Power	Message 1	Plant staff/EP staff
	Opera	tion Current Chemistry Summary for 06/03/03.	•	
2.	0700	Shift relief:	Message 2	CR Operators/ Simulator Lead controller
	a.	Full power steady state, approaching middle of Cycle		
		(MOC)		
	b.	115 KV NMP Line #4 OOS for planned		•
		maintenance; removed at 0800 on 6/2/03		
		i. For Technical Specification LCO 3.8.1,		
		Action Table 3.8.1.A has entered and		v.
		Required Actions' completion in progress		4
	· v	1. Per Operations Department		
		Standing Order #02-015, LCO		•
		3.8.1.a is NOT met. ActionTable		•
		Section A has been entered:		
		a. Required Action 3.8.1.A.1		
		has been successfully		
		accomplished.		
		b. Required Action 3.8.1.A.2		
		has been evaluated and is		
		NOT applicable at this		
		time. Monitoring will		
		continue.		
		c. Required Action 3.8.1.A.3		
		is active; the 7-day clock		
•		will expire on 6/9/03 @ 0800.		
		ii. The #4 Line is expected to be returned for		
		resumption of service by the end of the		
		current shift.		
	c.	Elevated Dose Equivalent I-131 concentration in	Message 3	CR Operators/ Simulator
		reactor coolant		Lead controller
		i. Action Level 1 actions per AP-08.02 in		
		progress, which can include:		
•		1. Increased monitoring of Offgas		
		Radiation levels		
		2. Increased monitoring of coolant		
		activity		
		3. Convening the Failed Fuel Task		
		Force		
		1 0100		

- 4. Reviewing need for Flux Tilt Testing / power suppression
- 5. Reviewing related plant and industry OE
- ii. Troubleshooting Action Plan IAW AP-03.12 being developed, including preparation for Flux Tilt Testing per RAP-7.3.35
- 3. **0715** Loss of 115 KV LHH Line #3.
 - a. Operators should respond IAW:
 - i. Annunciator Response Procedures on panel 09-8,

ii. AOP-72, which includes:

- 1. Consideration of contacting NRC for enforcement discretion to avoid a plant shutdown if TS Completion Time is reached without restoration of offsite power
 - iii. Technical Specifications Action Table 3.8.1.C which has Required Actions for:
 - 1. Maintaining awareness of degraded redundant equipment,
- 2. Starting an additional 7-day clock for line restoration
 - iv. ODSO-10 which involves:
 - 1. Using Attachment 2 to record flags and relay operation for the abnormal breaker operation,
 - 2.Possible request for I&C assistance to interpret findings and troubleshoot,
 - v. Communication with ECC, Nine Mile Point and Niagara Mohawk Regional Operator.
 - b.At ~ 0730, with recognition of no power available from EITHER 115 KV Line, Emergency Plan Classification of NUE 6.1.1 is expected.
- 4. ~0735 IF the NUE has not been classified at this point inject Message #7.
- 5. **0830** Information received on toxic atmosphere occurrence and personnel injury in Power Block (EAL Table 8.3 area).
 - a. Upgrade to Emergency Plan classification of ALERT 8.3.5 expected.
 - b. Response IAW Emergency Plan, First Aid Team, and AP-09.10 for Hazardous Material response.

Supplemental 1

I&C Controller/I&C Tech OR, Simulator Controller/ CR Operator

Message 4, 5, 6 (as needed)

Simulator Controller/ CR Operator

Message 7 (if needed)

Simulator Lead Controller/Shift Manager

Supplemental 2

Safety Controller/ person in Cable spreading room

area

Supplemental 2

Safety
Controller/Fire Brigade
and/or first aide team

6. ~0850 IF the Alert has not been classified at this point inject Message #9.

Message 8

Simulator controller or TSC controller/ Emergency Director Simulator controller/ CR operator

7. ~0930 Some time after upgrade to ALERT is executed, Restoration of power to 115KV LHH Line #3 occurs.

Message 9

8. 1045 Initiation of small HPCI Steam Line leak in d/w entrance area.

Message 10

OSC controller/NPO dispatched to investigate

a. Temperatures in d/w entrance will eventually rise to require entry into EOP-5 and also reach area temperature isolation set point for HPCI/RCIC steam valves.

i.EOP-5 actions will involve actions to Control Secondary Containment Radiation, Temperature and Level concurrently including:

- 1. An attempt to isolate any primary system leaking into the Secondary Containment
- 2. 23 MOV-15 will NOT auto isolate. Moreover, when manual closure is attempted, valve breaker will trip, leaving valve NOT FULL CLOSED.

3. Direction to enter EOP-2 as Secondary Containment parameters approach MAX SAFE values Crew expected response:

- a. At a minimum by initiating plant shutdown and
- b. At the extreme by initiating reactor scram (probably via EOP-5 to EOP-2 entry as area temperatures in d/w entrance continue to rise)
- 4. 1100 Inadvertent reactor scram (if necessary). Also (if necessary) to fail Bypass Valves closed.
- 5. Following scram crew will stabilize RP water level, pressure and power, including initiation of normal plant cooldown at <100 deg F/hr
- 9. ~1115 Upgrade to Emergency Plan Classification of Site Area Emergency 3.4.1 expected with the recognition of leak in Reactor Building with failure to isolate

10. ~1135 IF the Site Area Emergency has not been classified at this point inject Message #11.

Message 11

TSC or EOF Controller/ED

- 11. 1215 DBA-sized LOCA occurs in drywell
 - a. CS Pump A will trip after several minutes of severely oscillating parameters (as if suction path is impeded)

Supplemental 3

OSC Controller/ Damage Control Team

- b. 10P-3D will NOT start.
- c. Significantly less than expected flow will be provided from LPCI Subsystem A (more effects from impeded flow path)
- d. Condensate injection will cease after ~5 minutes due to low Hotwell inventory, causing trip of Condensate and Condensate Booster Pumps
- e. RPV level will return to between -50" and -30", but no higher due to degraded ECCS injection. Crew expected to determine that level will NOT restore to >-19":
 - EOPs will be exited and Severe Accident Operating Guidelines (SAOGs) and associated Technical Support Guidelines (TSGs) will be entered.
- 12. ~1220 A release will begin from the Stack through Standby gas treatment and continue to trend up to approximately 16 mR/hr on the Stack High Range Effluent Monitor. Release will exceed Tech Specs at Approximately 1230.
- 13. **1230**
 - a. Upgrade to Emergency Plan Classification of General Emergency 3.4.2 is expected due to primary system leak with failure to isolate, AND RPV water level<0"(TAF). Emergency Plan Classification of General Emergency 2.1.3, Primary Containment Flooding Required, would also be applicable at this point.
 - b. Protective Action Recommendations will be issued ERPAs for evacuation 1, 2, 3, 4, 7, 9, 26, 27 shelter all remaining.
 - c. Radiation monitors ramp IAW Exercise timeline
- 14. Post 1230
 - a. Support restoration of 10P-3D as ERO troubleshoots and attempts repair. Efforts should be successful.

Supplemental 4

OSC Controller/ Damage Control Team

	b. Reasonable ERO actions to restore LPCI A to full flow will be permitted to be successful.	Supplemental 5	TSC controller and Simulator controller/SM
	c. Continue to modify radiation monitors IAW		
	Exercise timeline		
15.	~1235 IF the General Emergency has not been	Message 12	TSC or EOF Controller/ ED
	classified at this point inject Message #12.		עט
16.	~1300 Release rate peaks and begins to trail off and		
	will go below Tech Specs at approximately 1600.		
17.	~1345 A wind shift will occur that will result in		
	ERPA 5 being added to the Protective Action		
	Recommendation.		
18.	~1600 Exercise is Terminated – this is injected at	Message 13	All facility lead Controllers/All facility
	the		managers
	Direction of the Emergency Planning Manager.		