

OFFICE OF THE SECRETARY
CORRESPONDENCE CONTROL TICKET

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ACTION OFFICE: EDO

To: Zimmerman, NSIR

AUTHOR: Vanessa Quinn

Cys: EDO
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AFFILIATION: FEMA

ADDRESSEE: Bruce Baughman

SUBJECT: Department of homeland Security/Federal Emergency Management Agency's (DHS/FEMA) identification of a Deficiency during the Browns Ferry Radiological Emergency Preparedness (REP) exercise conducted on 7/25/07.

ACTION: Information

DISTRIBUTION: RF

LETTER DATE: 08/06/2007

ACKNOWLEDGED: No

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NOTES:

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DATE SIGNED:

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FEMA

Mr. Bruce Baughman, Director
Alabama Emergency Management Agency
P.O. Drawer 2160
Clanton, Alabama 35046-2160

AUG - 6 2007

Dear Mr. Baughman:

This letter officially informs you of the Department of Homeland Security/Federal Emergency Management Agency's (DHS/FEMA) identification of a Deficiency during the Browns Ferry Radiological Emergency Preparedness (REP) exercise conducted on July 25, 2007. This issue was discussed during the post-exercise participants' briefing on July 27, 2007.

The Deficiency identifies Limestone County's failure to demonstrate their ability to protect the health and safety of the public during this exercise. Specific Evaluation Areas encompassed in this Deficiency include (EA #1) Emergency Operations Management, (EA #2) Protective Action Decision-making, (EA #3) Protective Action Implementation and (EA #5) Emergency Notification and Public Information. Factors leading to this conclusion include the loss of control of school children by dismissing them early and, following their release and with the situation changing, the County failed to inform the parents of their children's possible locations. The county also introduced actions not in concert with the negotiated extent of play agreement and made uncoordinated exercise injects changing the conditions under which the scenario was developed which impacted the operational tempo for all jurisdictions. Further, the operation found itself in transition to electronic displays which were not available (no provision for paper back-up), plans and procedures were not followed (and in the case of plans were not available for the county responders) and unilateral changes to the scenario negated procedural checklist usefulness. A full re-demonstration of the Limestone County plans and procedures that include activities evaluated in Evaluation Areas 1, 2, 3, and 5 is required within 120 days of the date of the exercise.

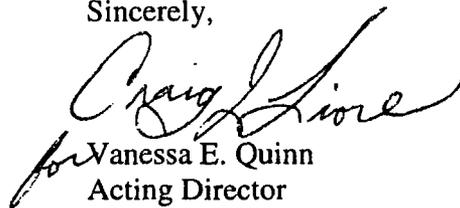
In accordance with 44 CFR 350.9(d) and the DHS/FEMA REP Program Manual, we have thoroughly reviewed and discussed this issue with DHS/FEMA Headquarters, the U.S. Nuclear Regulatory Commission, and DHS/FEMA Region IV's Regional Assistance Committee members present at the exercise. The DHS/FEMA REP Program Manual, Exercise Annex B: Exercise Evaluation Methodology, defines a Deficiency 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." Because of the potential impact of a Deficiency on the public health and safety, it is expected to be corrected within 120

days after the exercise through appropriate remedial actions, which may include plan revisions, additional training or drills and a remedial exercise.

The Atlanta Field Office will interact directly with the State of Alabama, Alabama Emergency Management Agency, Alabama Department of Health-Office of Radiation Control, Limestone County and the utility in developing a new Extent-of-Play to evaluate the implementation of Limestone County's plans and procedures. Please coordinate directly with the Atlanta Field Office, REP Program Office to specify the date and time of the pertinent remedial actions and the identity of the State and county participants within 10 days from the date of this letter.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Mr. Conrad Burnside, Regional Assistance Committee Chair, FEMA Region IV at 770-220-5486.

Sincerely,

A handwritten signature in cursive script, appearing to read "Vanessa E. Quinn".

for Vanessa E. Quinn

Acting Director

Technological Hazards Division

National Preparedness Directorate

Cc: Regional Administrator, NRC R-II
Regional Administrator, FEMA R-IV
Alabama Department of Health-
Office of Radiation Control