

NEI 06-04

Revision 1

Nuclear Energy Institute

**Conducting a Hostile Action-Based
Emergency Response Drill**

October 30, 2007

ACKNOWLEDGEMENTS

This document was developed by the Nuclear Energy Institute (NEI) Emergency Preparedness (EP) Working Group and the NEI EP Hostile Action-Based Drill Task Force in conjunction with the U.S. Nuclear Regulatory Commission and Department of Homeland Security (DHS) staffs. We appreciate the direct participation of the NRC and the industry support members that contributed to the development of the guidance.

EP Hostile Action-Based Drill Task Force

Marty Hug	Nuclear Energy Institute
Sue Perkins-Grew	FPL Energy Seabrook Station
Kevin Appel	Exelon Nuclear
Steve Erickson	Exelon Nuclear
Nick Avrakotos	Entergy
David Young	FPL Energy Seabrook Station
Vernon Higaki	First Energy
Brian Ashbrook	Southern California Edison
Steven Giannell	Southern California Edison
Diane Coffin	PPL Susquehanna LLC
James Tucker	FPL Energy Seabrook Station
Larry Green	Lake County Ohio Emergency Management
Kevin Bruckerhoff	AmerenUE
James Michael Davis	Florida Power & Light Energy
Theresa Gildersleeve	Progress
Cheryl Jenkins	FirstEnergy
Scott McCain	Exelon Nuclear
Alan Nelson	Nuclear Energy Institute
Martin Vonk	Nuclear Management Co.

Industry Support

John Baer	FPL Energy Seabrook Station
Kelle Barfield	Entergy
Beth Boesch	Nebraska Public Power District
Guy Cerullo	DTE Energy
Edward Conaway	South Texas Project
John Costello	Dominion
Luke Graessle	AmerenUE
Steve Higginbottom	Southern Nuclear Operating Co.
Glenda Jardel	Exelon
Walter H. Lee	Southern Nuclear Operating Co.
Mark Lemke	Pacific Gas and Electric Co.
John Rayman	Dominion
William Renz	Dominion
Ron Rose	FirstEnergy
Jerry Sims	Southern Nuclear Operating Co.
Paul Sullivan	Nuclear Management Co.
Mary Ann Wilson	Entergy

Pilot Sites and Host/Participating States

Diablo Canyon	California
Duane Arnold	Iowa, Illinois
North Anna	Virginia
Vermont Yankee	Vermont, New Hampshire, Massachusetts, North Carolina, Iowa, Illinois, Pennsylvania
Callaway	Missouri, Iowa, Illinois

Liaisons to Task Force

Joseph Anderson	Nuclear Regulatory Commission
Randy Sullivan	Nuclear Regulatory Commission
Vanessa Quinn	FEMA/Department of Homeland Security
Dan Wilcox	FEMA/Department of Homeland Security

NOTICE

This report was prepared as an account of work sponsored by NEI. Neither NEI nor any of its employees, members or consultants make any warranty, expressed or implied, or assume any legal liability or responsibility for the accuracy, completeness or usefulness of any information, apparatus, product or process disclosed in this report, or represent that its use would not infringe privately-owned rights.

The opinions, conclusions and recommendations set forth in this report are those of the authors and do not necessarily represent the views of NEI, its employees, members or consultants.

Because NEI is supported in part by federal funds, NEI's activities are subject to Title VI of the Civil Rights Act of 1964, which prohibits discrimination based on race, color or national origin, and other federal laws and regulations, rules, and orders issued thereunder prohibiting discrimination. Written complaints of exclusion, denial of benefits or other discrimination on those bases under this program may be filed with the NRC at 11545 Rockville Pike, Rockville, MD 20852; with any other appropriate federal regulatory agency; or, among others, with the Tennessee Valley Authority's Office of Equal Employment Opportunity at 400 West Summit Hill Dr., Knoxville, TN 37902.

TABLE OF CONTENTS

1.0 OVERVIEW 1-1

2.0 OBJECTIVE DEVELOPMENT 2-1

3.0 PLANNING AND PREPARATION 3-1

4.0 SCENARIO DEVELOPMENT 4-1

5.0 IMPLEMENTATION 5-1

6.0 OPERATING EXPERIENCE 6-1

7.0 PRE-DRILL TABLETOP GUIDANCE 7-1

8.0 SUMMARY OF CHANGES 8-1

APPENDIX A—Required Functional Demonstrations A-1

APPENDIX B—Acronyms and Glossary B-1

APPENDIX C—Pre-Drill Tabletop Guidelines C-1

1.0 Overview

The NEI EP Hostile Action-Based Drill Task Force has developed this document to establish guidelines for conducting hostile action-based emergency response drills. These drills are intended to practice the integrated response to a land- or water-based or airborne attack on a commercial nuclear power generating facility.

NEI 06-04 Revision 1 provides guidelines for each of the following drill elements:

- objective development
- planning and preparation (including conduct of pre-drill tabletop)
- scenario development
- implementation.

The periodic implementation of a hostile action-based emergency response drill has replaced the practice of conducting a tabletop drill during each force-on-force exercise. There are several key differences between the force-on-force tabletop drill and a hostile action-based emergency response drill. Specifically, a hostile action-based drill:

- will not include an actual adversary force or armed tactical responses by site security officers or local law enforcement agency (LLEA) in order to neutralize the adversary or forcefully regain control of occupied areas/equipment
- will include a method to demonstrate the capabilities of site security interface with associated facilities (e.g., the central alarm station (CAS) and the secondary alarm station (SAS) and control room)
- will assume that the adversary force successfully inflicts significant damage to the facility and some casualties to the station staff
- will require activation and operation of an on-site or near-site incident command system (ICS) facility (e.g., incident command post (ICP))
- will include a demonstration of an integrated response among on-shift personnel (primarily from operations and security), law enforcement, fire fighters, and medical response personnel
- will include a demonstration of the coordination and decision-making actions necessary for prompt mobilization or relocation of the emergency response organization (ERO) once the threat has been neutralized
- will involve participation by key off-site emergency response personnel (e.g., state/county decision-makers).

As discussed in NRC Bulletin 2005-02, "Emergency Preparedness and Response Actions for Security-Based Events," licensees should periodically test and exercise hostile action-based emergency response capabilities. To this end, it is expected that each site will perform one hostile action-based drill within the three-year period between September 2006 and December 2009. Going forward, as part of ongoing NRC and Federal Emergency Management Agency rulemaking efforts, the use of a hostile action-based scenario in one exercise in the six-year cycle will be incorporated into the licensee's drill program.

2.0 Objective Development

On-shift personnel (from operations and security) will demonstrate the receipt of threat information, and perform the immediate and near-term actions and communications necessary to respond to the event. The expected actions and communications are summarized below:

- communicate pre-determined protective actions to on-site personnel that are appropriate to the threat conditions
- notify off-site first responders (law enforcement, fire response, etc.)
- perform/discuss immediate actions in response to the hostile action
- assess and classify the event
- notify the ERO
- notify state, county and/or local warning points, including transmittal of protective action recommendations (PAR) appropriate to the licensee's emergency plan and response procedures, and the threat conditions
- Implement plant shutdown and cool-down as well as coping strategies
- NRC notifications (including accelerated notifications when required).

Off-site response organizations (ORO) are expected to demonstrate their initial response actions, prioritize and allocate resources, and support the site in response to the consequences of the postulated hostile action.

Once the ERO is activated and integrated into the station's response to the event, it is expected that the following key capabilities will be demonstrated:

- activation and implementation of the ICS, in accordance with local protocols, and coordination between the ICS facilities and the ERO and other applicable ORO facilities
- coordination of decision-making and actions necessary to permit coordinated movement of responding resources and mobilization of the ERO
- activation of ERO facilities (primary or alternate)
- ongoing response coordination among the ERO, on-site security, OROs, local law enforcement, federal agencies, and fire and medical response personnel
- ERO and ORO responses to the consequences of the attack (i.e., large-scale/significant damage to the plant). The scenario must present the conditions necessary for, or leading to, core damage with a potential for a radiological release such that if actions are not taken, core damage and a subsequent release will occur. A success path to prevent the radiological release will be provided as part of the scenario.
- coordination with off-site EROs, including consideration of conditions unique to a hostile action-based response (e.g., contingency resource management based on currently deployed or unavailable ORO resources)
- development of public information.

Licensees already have in place a standard set of objectives for the demonstration of emergency response functions and capabilities specific to each site. These objectives cover the elements necessary to respond to a declared radiological emergency. Implementation of a hostile action-based emergency response drill will require the development of additional objectives reflecting the unique actions taken in response to an attack.

Appendix A presents the required functional demonstrations for a hostile action-based drill. Each licensee should use this generic guidance when considering existing plans and procedures and should include the expected performance-based attributes of an acceptable demonstration.

Each drill shall be critiqued using the licensee's standard critique process. Drill weaknesses identified by the critique process shall be entered into the site's corrective action program.

Objectives and extents-of-play for OROs should be premised on the standard DHS-FEMA REP exercise evaluation criteria with consideration given to exceptions made to the criteria based on challenges presented by a hostile action-based scenario. Because a hostile action-based scenario will be incorporated into the six-year evaluated exercise schedule, eventually the ORO objectives should address as many of the exercise evaluation criteria as normally would be included in extents-of-play for evaluated exercises.

The Exercise Evaluation Manual section of NEI 06-04 revision 0 is not repeated in this revision, but remains available as guidance for off-site organizations familiar with the traditional FEMA REP exercise objectives and extent-of-play descriptions.

During Phase 3 drills (2006-2009), ORO objectives may be streamlined to focus on elements of the response that are specifically challenged by a hostile action-based event. These elements of the ORO response include, but are not limited to:

- twenty-four hour capability of off-site responders to be notified by the licensee of a hostile action-based incident requiring off-site law enforcement/fire/emergency medical services (EMS) response
- mobilization of off-site first responders to assist on-site response to the hostile action-based event
- implementation of the ICS in response to the hostile action-based incident
- capability to identify and mobilize support resources (e.g., mutual aid resources)

- coordination of ICS command staff with the licensee's operations, security response, and radiation protection personnel to ensure protection of first responders arriving at the plant site
- twenty-four hour capability of off-site warning points to receive notification of a declared emergency classification while LLEA/fire/EMS response to the attack is under way
- mobilization of ORO personnel and activation of principal ORO emergency facilities
- communications between licensee emergency response facilities, ICS facilities and off-site emergency response facilities
- implementation of emergency support functions in support of LLEA/fire/EMS response to the attack
- support for site access controls and traffic controls beyond the site boundary
- assessment of the extent of plant damage and potential off-site radiological consequences with consideration of limitations on deployment of field monitoring teams near the site
- protective action decision-making for off-site populations with consideration of potential threats posed by an attack on the plant
- implementation of protective action decisions (PAD) for the general public including consideration of conditions unique to a hostile action-based response (e.g., contingency resource management based on currently deployed or unavailable ORO resources)
- consideration of effects of a mass casualty event on local medical resources including the ability to implement PADs
- generation of timely, accurate and coordinated public information statements
- timely implementation of alert notification system and concise, readily understood instructions for the public
- development of public information with considerations for law enforcement restrictions

A physical attack on a nuclear power plant would not be expected to occur in a vacuum, and the assessment of other nearby infrastructure vulnerabilities to a hostile action and development of protective strategies would be a logical and expected response by OROs. Assessment of infrastructure vulnerability is not included in the standard DHS-FEMA REP exercise evaluation criteria, but developers of the off-site components of a hostile action-based drill or exercise are encouraged to consider it as an ancillary objective for hostile action-based scenarios.

3.0 Planning and Preparation

The success of any drill is largely dependent upon the amount of planning and degree of preparation. This responsibility typically rests with the site and/or corporate EP department; however, a hostile action-based drill requires the active involvement of site security department management. Adequate security department support is critical to the successful development and execution of the drill. Specific elements required of security involvement include:

- knowledge of procedures, indications and timelines
- credible attack sequence and reports
- simulation of CAS/SAS/officer response actions
- coordination between CR/simulator and security controllers
- ensuring no safeguards concerns.

Off-site response agencies have or will be adopting the protocols described in the National Incident Management System (NIMS) and the ICS. To facilitate better response and drill planning, EP and security department personnel are strongly encouraged to become familiar with the concepts and principles of the NIMS and ICS.

Key drill participants should receive a thorough briefing on the proposed drill scope, extent-of-play and performance expectations. (Note: Given the significant role played by the incident commander (IC), it is recommended that this individual be afforded an opportunity to observe a hostile action-based drill at another site before participating in one).

The IC, and representatives of local and regional law enforcement agencies should be familiarized with the importance of allowing a prompt/timely ERO mobilization once the known threat has been eliminated. To give licensee's perspective on these situations, it is recommended that participating LLEA personnel be offered an opportunity to observe or participate in a simulator training session(s) using a hostile action-based scenario leading to plant damage.

The licensee should review the location and adequacy of the ICP chosen for the drill. This facility should be located at an appropriate standoff distance from the power block. The resources and capabilities should be consistent with that of existing capabilities that enable implementation of key ICS functions. In addition, the following facility readiness elements should be assessed to maximize drill effectiveness:

- accessibility by off-site responders
- security of the selected location
- work spaces
- communications capabilities (e.g., test hand held radio devices)
- logistics (e.g., displays, documents, etc.).

Provisions should be in place to facilitate the accurate and timely flow of information between the ICP and other emergency response facilities. Liaison(s) (with operational, security, radiological knowledge, etc.) should be dispatched to the ICP to coordinate the performance of priorities and strategies between law enforcement, fire fighters and ERO representatives.

Specific communication protocols between the ICP and other emergency response facilities may be necessary to address the unique challenges of the release of public information. These communication protocols should be established and verified by all stakeholders prior to conducting the drill. The licensee should consider evaluating the need for a public information liaison between the ICP and the Joint Information Center (JIC).

To better reflect the conditions of a real event, the drill scope should include fire fighting and medical responses. The drill extent-of-play should discuss the resources required to demonstrate these responses. Consideration should be given to the number and type of responders and vehicles, use of staging areas, communications equipment, and simulated or actual processing into the protected area.

Actions that would normally occur inside the protected area may be simulated at other locations. If play will occur inside the protected area, developers should determine access needs (actual or simulated) and complete access requirements necessary before the drill to facilitate prompt entry into the protected area during the drill.

The expected communications paths among emergency response facilities (both on- and off-site), the ICP and in-field/on-scene responders should be clearly defined and verified. Communications paths and protocols should be reviewed with off-site decision-makers, and identified issues should be addressed for communicating plant and threat status information. For instance, an actual test of communication capability (e.g., call downs) should be conducted prior to the drill.

In accordance with NEI 99-02, Regulatory Assessment Performance Indicator Guideline, Revision 5, a licensee should determine if the drill/exercise performance (DEP) opportunities from the drill will count and declare their decision in advance. As discussed in NEI 99-02, Revision 5, drill participation (ERO) performance indicator credit may be given even though a DEP opportunity is not presented, provided certain other conditions are met.

Prior to the drill, the licensee should conduct an integrated tabletop drill with the organizations and agencies participating in the drill. All key on- and off-site decision-makers should be represented. The tabletop drill should be done 4-6 weeks before the NEI 06-04 drill. Refer to Section 7.0 and Appendix C for information on conducting a hostile action-based tabletop drill.

Licensees should consider the information presented in the NRC Letter, "Communication Expectations for an Aircraft Threat Scenario, Leach to Nelson," dated Aug. 2, 2007, (ADAMS accession number ML071770326), when assessing response procedure readiness and, if using this type of threat, during scenario development.

4.0 Scenario Development

A team of representatives from key on-site stakeholder organizations including EP, operations and security should develop the drill scenario. Effective collaboration is also required with off-site stakeholders. Such stakeholders should include local law enforcement and fire agencies, and emergency response decision-makers at the state, county and local level.

When developing a hostile action-based scenario, the first decision to be made is whether the drill will be based on a land- or water-based attack or an airborne attack. As used here, an airborne attack refers to the commandeering of a large aircraft and its impact on the site. Each attack type presents its own unique challenges and response requirements.

The following high-level scenario structures are recommended as a guide to developing the drill scenario timeline.

Land- or Water-Based Attack	Airborne Attack
The drill begins with the commencement of the attack (consideration in the scenario should include possible diversions and other attacks). ¹ A declaration in accordance to station procedures is expected. Allow a reasonable amount of time for the attack phase such that the adversaries are successful in disabling selected equipment.	The drill begins the receipt of an airborne threat notification (consideration in the scenario should include possible diversions and other attacks). ² A declaration in accordance to station procedures is expected. The control room should implement prioritized immediate airborne threat response actions before aircraft impact.
Assigned drill players should follow the instructions normally provided for this event (e.g., remain in place). The ICP should be established as early as possible.	Assigned drill players should follow the instructions normally provided for this event. The ICP should be established as early as possible.
Terminate the attack phase by informing the appropriate players that all known adversaries are accounted for and eliminated. (Controller injects may be required to facilitate ERO decisions). Key participants will be expected to demonstrate unique considerations of an unknown environment (e.g.,	After an aircraft impacts the site, disabling selected facilities/structures, a declaration in accordance with station procedures is expected. Restrictions on access to large areas would be expected.

¹ Consider use of an insider threat as an option.

² Consider use of an insider threat as an option.

Land- or Water-Based Attack	Airborne Attack
discussions regarding controlled movement of personnel).	
Following termination of the attack phase, decisions should be made to allow operational assessment and ERO movement /mobilization. Authorization for ERO movement should be determined by the appropriate decision-makers.	Following the impact, decisions should be made to allow operational assessment and ERO movement/mobilization. Authorization for ERO movement should be determined by the appropriate decision-makers.
If necessary, introduce additional equipment failures to achieve a general emergency (GE) declaration (if one was not previously declared), which would drive protective action discussion prior to the end of the drill. Re-establish perimeter control and preservation of the crime scene.	Following the impact, introduce equipment failures to achieve a GE declaration (if one was not previously declared), which would drive protective action discussion prior to the end of the drill. Re-establish perimeter control and preservation of the crime scene.

To maximize the engagement of all on- and off-site participants, the drill should be run real-time or as near real-time as feasible. A time jump or time compression may be used provided that it does not preclude the demonstration of significant decisions or actions that participants would have made during the jumped/compressed period (i.e., the decisions or actions necessary to meet the drill objectives).

The approach outlined above for the land- or water-based attack scenario “accelerates” through the threat resolution period to a point where ERO mobilization can be considered. It is recognized that some period of time would elapse before law enforcement personnel would allow conditional or unrestricted movement by plant personnel. During the drill, the granting of authorization for ERO movement should be preceded by a robust discussion of the attendant event constraints and considerations. Actions that would be required before personnel movement is allowed should be determined; however, it is not expected that these actions be played out (e.g., actual sweeps for devices or additional hostile forces). Use of a drill message to inform participants that the actions have been completed may be used to allow the drill to progress. This approach allows the drill to progress near real-time, and allows for initiating mobilization of the ERO within a reasonable time period.

The scenario events are expected to present the conditions necessary for, or leading to, significant damage to irradiated fuel. Additionally, the scenario events should create a sense of urgency in assessment and the need for restoration of equipment or systems that drive the need for mobilization of resources in a controlled manner. The threat may be presented to fuel either in the reactor core or the spent fuel pool. In addition, there must be a potential for a radiological release. The drill will not include a radiological release; however, the scenario needs to present a threat significant enough to drive

discussion between the ERO and off-site agencies on response actions in anticipation of a release and potential public protective actions (e.g., deployment of field monitoring teams, etc.). A GE declaration will be necessary to ensure a licensee-issued PAR and any associated protective action discussions between the licensee and OROs are observable. A PAD by OROs is expected.

It is recognized that some licensees may encounter complications with scenario development regarding plant conditions that require a GE declaration, yet do not include a radiological release. In such rare situations, the use of contingency messages directing the GE declaration may be used to force a “discretionary” GE declaration. This method would exclude counting the declaration as a DEP opportunity.

These drills will not simulate the defeat of the site security force nor reveal safeguard information. The scenario presents the failure of multiple safety systems, as is done in a typical reactor event scenario, but the failures are initiated by events associated with a hostile action-based event. Care should be taken when selecting and specifying the equipment damaged by the attack. A complete target set should not be specified; however, if a complete target set is used to drive the core threat, then the scenario must specify enough additional damaged equipment such that an outside observer could not identify which components comprise a complete target set. Also consider specifying in the initial conditions that certain components are out of service for maintenance. These out-of-service components could compound the results of the attack or provide a success path for the ERO.

Due to the potential information value, scenario-related information should be treated as security sensitive. Scenario development staff should be familiar with the requirements of 10 CFR 2.390 in reference to release of information regarding physical protection or processes. Sharing experiences and insights with other emergency responders is expected; however, caution should be used when sharing information with a wider audience if it could include sensitive information.

The development of a detailed land- or water-based attack timeline (i.e., the adversary movements and events occurring during the attack phase) will require support from knowledgeable security department personnel. This timeline should provide a listing of critical officer reports, camera observations, door alarms and information from other sources that can be used by a controller to describe the progress of the attack. This information should contain the number and location of all casualties. The times for damage to safety-related equipment should also be specified. Once developed, this timeline should be included as a mini-scenario in the master drill package; however, distribution should be limited to appropriate controllers and players.

A mini-scenario(s) may also be developed for fire fighting and medical responses. Proper scenario development may serve as credit for required medical and fire drills; however, these response actions should be maintained under the purview of the local IC. A fire mini-scenario provides a description of the fire and the expected actions by the on-site fire brigade and off-site fire department personnel. A medical mini-scenario would typically contain the number and location of the fatalities and injured. Medical information should also include vital signs for the injured, simulated names for injured members of the site staff and expected triage assignments.

The scenario package should contain drill-specific emergency messages to the plant staff, (e.g., plant page announcements, pager text messages, etc.) These messages should contain the elements of real messages but be modified as needed to reflect the drill extent-of-play. For example, a message may include a statement such as "Personnel not assigned to the drill should continue with normal duties." Off-site agencies should be encouraged to develop specific scenario components that will allow those agencies to exercise desired capabilities or functions. For example, a county emergency management agency electing to test a triage facility should develop the scenario conditions and supply the resources for the demonstration of that mini-scenario. As part of scenario development meetings, the level of engagement necessary to develop and successfully execute a mini-scenario (i.e., scenario detail and resources) should be provided to the off-site agencies.

5.0 Implementation

It is expected that hostile action-based drills be implemented using the site's simulator control room.

A method (e.g., a control cell) should be established to demonstrate coordination and communication with a simulated CAS and SAS. The selected method should include participation by personnel familiar with the operation of these facilities, and capable of simulating responses by the CAS and SAS. For a land- or water-based attack scenario, the events of the simulated attack timeline should be presented to the appropriate CAS or SAS individual by a security controller. The CAS or SAS operator is expected to initiate and maintain communications with the simulator control room and other response facilities in accordance with site-specific procedures and training.

To the degree practical, off-site personnel should respond to the ICP and the site in real-time, (i.e., do not pre-stage personnel unless normal travel times are prohibitive). If personnel are pre-staged, consider use of appropriate time delays before allowing individuals to begin play.

On-site and off-site ICs (e.g., emergency directors), and security shift supervisors should jointly determine a plan of action to facilitate prompt mobilization of the ERO. In developing this plan, decision-makers should assess accessibility of on-site facilities (e.g., TSC) to determine specific restrictions and requisite coordination to implement restrictions and if alternate facilities need to be used. Once the plan is developed and approved, a controller can provide a message initiating the conditions necessary to begin mobilization of the ERO. The plan should contain sufficient detail to drive discussion on specific unique actions. Players should actually perform these actions to the extent possible as defined by drill conditions. To maximize exercise fidelity, ERO members should respond to their facilities in real-time; however, time compression and pre-staging may be used to keep the scenario fluid and coherent.

Controllers should be prepared to deliver, or control the delivery of, emergency messages to the plant staff and ERO members, (e.g., plant page announcements, pager text messages, etc.) These messages should be modified as needed to reflect the drill extent-of-play. Field controllers need to be knowledgeable in the functions that they are controlling (e.g., security actions being controlled by security personnel, fire-fighting actions controlled by individuals with fire-fighting expertise). Field controllers should have means of communication back to drill manager and or control cell.

6.0 Operating Experience

NEI maintains a listing of “lessons learned” from each Phase III threat-related drill. Site drill managers and scenario developers are strongly encouraged to review this information as they prepare for the drill. A copy of the “lessons learned” may be obtained by contacting NEI.

NEI should be used as a resource during the development of the extent-of-play to ensure that all elements that are required are covered in a licensee’s drill plan.

7.0 Pre-Drill Tabletop Guidance

The tabletop drill provides the opportunity for key personnel of the on-site and OROs to review and discuss their respective roles, priorities and response actions during a hostile action-based event. In particular, it permits the diverse organizations to gain an understanding of each other's immediate priorities and concerns in a hostile action-based event. For example, these events can provide off-site responders the perspective of the plant operating crew's immediate concerns with restoration of equipment important to safety and the need for ERO assistance. On the other hand, station staff is able to understand what special knowledge requirements (e.g., NIMS concepts) hostile action-based scenarios present to off-site decision-makers in order to exercise their responsibility for public safety. Therefore, it is important that the tabletop drill encourages a free exchange of priorities and concerns among the key participants while they have the opportunity to be in the same room.

Using a scenario, the tabletop facilitators would lead participants through a set of events and ask for their responses in a logical sequence. Normally, station security would explain its initial responses. The sequence would then progress through the responses of the operating crew, off-site first responders, station ERO response personnel and ORO responders. The tabletop thus takes the form of on-the-job training in the systematic approach to a training model.

Participating organizations should be arranged in the room to represent the level of communications that would be expected during the drill. Guidance for arrangement of the tabletop participants is provided in Appendix C.

The general theme of the tabletop scenario would be expected to be the same as that used for the drill (i.e., either airborne threat or land- or water-based attack). The specific sequence of scenario events should be sufficiently dissimilar if the drill scenario is to be taken as credit for the DEP indicator. The scenarios for the tabletop and the drill can be the same or similar, if DEP credit is not being taken and the drill is only for training purposes.

Refer to Appendix C for additional guidance.

8.0 Summary of Changes

This section summarizes the more significant changes made to Guideline with Revision 1. This is not intended to be a complete tabulation. The document was restructured and streamlined in the interest of incorporating industry lessons learned from the conduct of these drills in 2007 and to promote a more consistent approach to hostile action-based drill implementation. Additionally, the intent of the document restructure is to provide licensees with a more succinct guideline to follow in the development and implementation of these drills. This revision focuses on the unique characteristics and attributes that a hostile action-based drill imposes upon a licensee's drill program.

Revision 0 provided an original design basis for this drill initiative whereas Revision 1 provides more refined guidance in meeting the expectations for the conduct of these hostile action-based drills.

Revision 1 structure is comprised of the following sections to model the process for developing and implementing a hostile action-based drill:

- 1.0 Overview
- 2.0 Objective Development
- 3.0 Planning and Preparation
- 4.0 Scenario Development
- 5.0 Implementation
- 6.0 Operating Experience.

These new sections contain the elements of Revision 0 sections as applicable to the revised focus on only the unique attributes of these drills and consistency with industry lessons learned. For instance, the implementation guidance was rewritten to minimize the focus on dividing the drill into two parts and making the time jump optional (an industry lesson).

7.0 Pre-Drill Tabletops

This is a new section added to promote an industry best practice.

Appendix A—Required Functional Demonstrations

This new Appendix A replaces Revision 0 Appendix A—On-site Objective and Demonstration Criteria. The intent with this change is to promote flexibility in the development and performance of objectives in accordance with the licensee's drill program and administrative requirements. Licensees have established drill programs that prescribe the format, performance and periodicity of objectives. The new appendix provides a list of demonstrations necessary to implement a hostile action-based drill; however, it allows the licensee to incorporate these demonstrations into objectives and performance criteria that is consistent with their program and stakeholders.

Appendix B—Acronyms and Glossary

This appendix reflects no significant changes from Revision 1.

Appendix C—Pre-Drill Tabletop Guidelines

This new appendix was included as an industry best practice.

Appendix B—The Exercise Evaluation Manual section of NEI 06-04 Revision 0 is not repeated in Revision 1, but remains available as guidance for off-site organizations familiar with the traditional FEMA REP exercise objectives and extent-of-play descriptions. Additional text regarding off-site objective development was incorporated into new Section 2, Objective Development. The basis for this change is that objectives and extents-of-play for OROs should continue to be premised on the standard DHS-FEMA REP exercise evaluation criteria. Again, this guideline was re-written to focus on considerations and exceptions imposed upon the criteria based on challenges presented by a hostile action-based scenario.

Appendix A Required Functional Demonstrations

Functional Demonstration	NUREG 0654 Planning Standard	Performance Attributes
1. Demonstrate the ability to implement the emergency plan during a hostile action-based event.	A, B, D, E, F, J	Timely and correct implementation of appropriate procedures for direction of on-site protective measures, emergency classification, PARs, off-site notifications and ERO notification.
2. Demonstrate the ability to make initial notifications to law enforcement and other first responder agencies during a hostile action-based event.	C, E, F	Timely notification is made to law enforcement, fire, medical and other response agencies as specified by appropriate procedures.
3. Demonstrate the ability to make accelerated NRC notifications.	F	Perform accelerated notification to the NRC in accordance with appropriate procedures.
4. Demonstrate the ability of on-shift Operations and Security personnel to coordinate response actions among themselves, the IC and with law enforcement.	F	Discussion, decision-making and communication related to: <ul style="list-style-type: none"> • communicating initial damage assessment and priorities for off-site response activities • threat location and progression • control, coordination and prioritization of on- and off-site resources for near-term response in accordance with security plan (e.g., perimeter control supplemented by LLEA) • radiation protection for off-site resources • changes to protective strategies • entry and/or staging points for law enforcement personnel • support for rapid deployment of law enforcement personnel.
5. Demonstrate the ability of operations and security personnel to coordinate responses by on- and off-site first responders (e.g., fire and medical response) after the threat is neutralized and prior to activation of ERO facilities.	F, L	Discussion, decision-making and communication related to: <ul style="list-style-type: none"> • control of site access for various responders, ensuring security measures are taken to protect the site from additional intrusion, coordinating with the IC • entry and/or staging points for fire trucks, ambulances, etc. • support for rapid deployment of first

**Appendix A
Required Functional Demonstrations**

Functional Demonstration	NUREG 0654 Planning Standard	Performance Attributes
		responder personnel.
6. Demonstrate the ability to mobilize the ERO in a timely manner following threat neutralization.	B, F	<p>Discussion, decision-making and communication related to:</p> <ul style="list-style-type: none"> • confirmation that the threat has been neutralized • status of the plant and potential for core damage/threat to public • fire fighting and medical responses • selection of safe passage routes and/or use of escorts • instructions on movement to be provided to responders (e.g., routes, escorts and exclusion areas; proceed directly to facilities; do not detour to inspect damage, etc.) • crime scene preservation • protection of emergency response facilities and staff by posting officers • coordination for allowing responder vehicles to exit the site for the EOF and JIC.
7. Demonstrate the ability of the site and the ERO to support activation and operation of an ICP.	F, H	<p>The following elements should be assessed.</p> <ul style="list-style-type: none"> • accessibility by off-site responders • dispatch of personnel to the ICP to serve as liaisons to ERO facilities • availability of site and plant layouts, and other logistics that the ICP staff might need to effectively manage law enforcement, fire and medical responses • communications with field responders.

Appendix A Required Functional Demonstrations

Functional Demonstration	NUREG 0654 Planning Standard	Performance Attributes
8. Demonstrate the ability of the ERO to coordinate in-plant and on-site response actions with security and the ICP.	F	<ul style="list-style-type: none"> • Effective interface must be demonstrated between the emergency director, on-site liaison(s) and the IC, including their roles, responsibilities and authorities as conditions change. • The ERO must coordinate the movement of on-site and in-plant response personnel with security and law enforcement decision-makers. • Response personnel must adhere to movement restrictions imposed by security and law enforcement decision-makers, (e.g., stay clear of perimeter zones, definition of free movement areas, special identification, two-person line-of-sight rule, use of escorts, etc.).
9. Demonstrate the ability of the ERO to activate alternate facilities (if required by the scenario).	F, H	<p>Determine if activation of alternate facilities is necessary based on the event conditions, and communicate this decision to ERO members.</p> <ul style="list-style-type: none"> • determine effectiveness of these locations • develop a plan to transition from alternate locations to primary ERFs as applicable
10. Demonstrate the ability to coordinate and conduct fire and medical responses in the field.	F, L	<ul style="list-style-type: none"> • Coordinate deployment of fire and medical response resources between ICP, on-site ERO facilities (if activated), and security. • Responses should be demonstrated to both multiple personnel casualties and a fire in the protected area potentially or actually affecting safety-related equipment.
11. Demonstrate the ability to account for on-site personnel once the threat is neutralized.	J	Discuss and/or implement appropriate strategies for conducting accountability and facilitating movement of on-site personnel (including assembly and release as required) in the post-threat environment.
12. Demonstrate radiation protection	K	As appropriate to the post-threat

**Appendix A
Required Functional Demonstrations**

Functional Demonstration	NUREG 0654 Planning Standard	Performance Attributes
measures for off-site responders.		environment, discuss and/or implement measures such as dosimetry, KI, respiratory protection, etc.
13. Demonstrate the ability to perform an assessment of off-site radiological consequences from a projected release.	I	<ul style="list-style-type: none"> • Perform an off-site dose projection based on a possible (e.g., what-if) radiological release. • Determine if the projection results cause or alter PARs.
14. Demonstrate the ability to assess the impact of the attack on the security plan, and to identify and implement compensatory measures if needed.	None	<ul style="list-style-type: none"> • Security management should assess the effects of the attack on the ability to control access (to both the site and the protected area), maintain defensive positions (officer casualties, damage to protective enclosures, etc.), and operate security-related equipment. • Compensatory measures should be developed to restore physical security; this may include use on law enforcement personnel and resources. • As needed, security should advise the appropriate ERO personnel of the need to invoke 10 CFR 50.54(x) <ul style="list-style-type: none"> • ERO and Operations perform subsequent notification to the NRC.
16. Demonstrate the ability of the ERO to coordinate the development and release of public information with the ICP.	G	Integrate public information officials from law enforcement agencies into JIC operations. Press releases and statements must be vetted for sensitive and safeguards information prior to issuance.

Appendix B Acronyms and Glossary

List of Acronyms and Abbreviations

ADAMS	Agencywide Documents Access and Management System
CAS.....	Central Alarm Station
CFR.....	Code of Federal Regulations
DEP.....	Drill/Exercise Performance
DHS	Department of Homeland Security
EAL	Emergency Action Level
ECL.....	Emergency Classification Level
EMAC.....	Emergency Management Assistance Compact
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EOP	Emergency Operations Plan
EP	Emergency Preparedness
EPA.....	Environmental Protection Agency
EPZ.....	Emergency Planning Zone
ERF.....	Emergency Response Facility
ERO	Emergency Response Organization
FBI	Federal Bureau of Investigation
FCO	Federal Coordinating Officer
FEMA.....	Federal Emergency Management Agency
FOSC.....	Federal On-Scene Coordinator
HSPD.....	Homeland Security Presidential Directive
IC	Incident Commander

**Appendix B
Acronyms and Glossary**

ICM	Interim Compensatory Measure
ICP	Incident Command Post
ICS	Incident Command System
IMT	Incident Management Team
INS	Incident of National Significance
IPZ	Ingestion Pathway Zone
JFO	Joint Field Office
JIC.....	Joint Information Center
JOC.....	Joint Operations Center
KI.....	Potassium Iodide
LLEA	Local Law Enforcement Agency
MACC	Multi-Agency Command Center
NCP	National Oil and Hazardous Substances Pollution Contingency Plan
NEI	Nuclear Energy Institute
NGO	Nongovernmental Organization
NIMS	National Incident Management System
NIRT.....	Nuclear Incident Response Team
NRC	Nuclear Regulatory Commission
NRP	National Response Plan
NRT.....	National Response Team
NSSE	National Special Security Event
OCA	Owner Controlled Area
ORO	Off-Site Response Organization
PA	Protected Area

**Appendix B
Acronyms and Glossary**

PAD.....	Protective Action Decision
PAR.....	Protective Action Recommendation
PFO.....	Principal Federal Officer
PIO.....	Public Information Officer
RERT	Radiological Emergency Response Team
RRT.....	Regional Response Team
SFO.....	Senior Federal Officer
SAMG	Severe Accident Management Guideline
SAS.....	Secondary Alarm Station
SWAT.....	Special Weapons and Tactics
UC.....	Unified Command

Appendix B Acronyms and Glossary

Applicable National Response Plan Glossary

Area Command	An organization established (1) to oversee the management of multiple incidents by an ICS organization or (2) to oversee the management of large or multiple incidents to which several incident management teams have been assigned. Area command is responsible for setting overall strategy and priorities, allocating critical resources according to priorities, ensuring that incidents are properly managed and ensuring that objectives are met and strategies followed. Area command becomes unified area command when incidents are multi-jurisdictional. Area command may be established at an emergency operations center (EOC) facility or at some location other than an ICP.
Casualty	Any person who is declared dead or is missing, ill or injured.
Catastrophic Incident	Any natural or manmade incident, including terrorism, that results in extraordinary levels of mass casualties, damage or disruption severely affecting the population, infrastructure, environment, economy, national morale and/or government functions. A catastrophic event could result in sustained national impacts over a prolonged period of time; almost immediately exceeds resources normally available to state, local, tribal and private-sector authorities in the impacted area; and significantly interrupts governmental operations and emergency services to such an extent that national security could be threatened. All catastrophic events are incidents of national significance (INS).
Command Staff	In an incident management organization, the command staff consists of the IC and the special staff positions of public information officer, safety officer, liaison officer and other positions as required, who report directly to the IC. They may have an assistant or assistants, as needed.
Credible Threat	A potential terrorist threat that, based on a threat assessment, is credible and likely to involve weapons of mass destruction.
Emergency	As defined by the Stafford Act, an emergency is “any occasion or instance for which, in the determination of the president, federal assistance is needed to supplement state and local efforts and capabilities to save lives and to protect property and public health and safety, or to lessen or avert the threat of a catastrophe in any part of the United States.”
Emergency Operations Center	The physical location at which the coordination of information and resources to support domestic incident management activities normally takes place. An EOC may be a temporary facility or a more central or permanently established facility, perhaps at a higher level of organization within a jurisdiction. EOCs may be organized by major functional disciplines (e.g., fire, law enforcement medical services), by jurisdiction (e.g., federal, state, regional, county, city, tribal) or by some combination thereof.
Emergency Operations Plan	The “steady-state” plan maintained by various jurisdictional levels for managing a wide variety of potential hazards.

Appendix B Acronyms and Glossary

Emergency Public Information	Information that is disseminated primarily in anticipation of an emergency or during an emergency. In addition to providing situational information to the public, it also frequently provides directive actions required of the general public.
Off-Site Response Organization	Includes federal, state, local and tribal public safety, law enforcement, emergency response, emergency medical (including hospital emergency facilities) and related personnel, agencies and authorities. Also known as “emergency responder” or “emergency response provider” in the National Response Plan (NRP).
Evacuation	Organized, phased and supervised withdrawal, dispersal or removal of civilians from dangerous or potentially dangerous areas, and their reception and care in safe areas.
Federal Coordinating Officer	The federal coordinating officer (FCO) is appointed to manage federal resource support activities related to Stafford Act disasters and emergencies. The FCO is responsible for coordinating the timely delivery of federal disaster assistance resources and programs to the affected state and local governments, individual victims, and the private sector.
Federal On-Scene Coordinator	The federal official pre-designated by the U.S. Environmental Protection Agency or the Coast Guard to coordinate responses under subpart D of the NCP, or the government official designated to coordinate and direct removal actions under subpart E of the NCP.
First Responder	Local and nongovernmental police, and fire and emergency personnel who, in the early stages of an incident, are responsible for the protection and preservation of life, property, evidence and the environment, including emergency response providers as defined in section 2 of the Homeland Security Act of 2002 (6 U.S.C. 101), as well as emergency management, public health, clinical care, public works and other skilled support personnel (e.g., equipment operators) who provide immediate support services during prevention, response and recovery operations. First responders may include personnel from federal, state, local, tribal or nongovernmental organizations (NGO).
General Emergency	Events are in process or have occurred that involve actual or imminent substantial core degradation or melting with potential for loss of containment integrity or hostile action that results in an actual loss of physical control of the facility. Releases can be reasonably expected to exceed EPA Protective Action Guideline exposure levels off-site for more than the immediate site area.
Hostile Action	An act toward a nuclear power plant or its personnel that includes the use of violent force to destroy equipment, take hostages, and/or intimidate the licensee in order to achieve an end. This includes attack by air, land or water using guns, explosives, projectiles, vehicles or other devices used to deliver destructive force. Other acts that satisfy the overall intent may be included. Hostile action should not be construed to include acts of civil disobedience or felonious acts that are not part of a concerted attack on the nuclear power plant. Nonterrorism based emergency action levels should be use to address such activities (i.e., violent acts between individuals in the owner controlled area).

Appendix B Acronyms and Glossary

Imminent	Mitigation actions have been ineffective, additional actions are not expected to be successful, and trended information indicates that the event or condition will occur.
Incident	An occurrence or event, natural or human-caused, that requires an emergency response to protect life or property. Incidents can, for example, include major disasters, emergencies, terrorist attacks or threats, wildland and urban fires, floods, hazardous materials spills, nuclear accidents, aircraft accidents, earthquakes, hurricanes, tornadoes, tropical storms, war-related disasters, and public health and medical emergencies.
Incident Action Plan	An oral or written plan containing general objectives reflecting the overall strategy for managing an incident. It may include the identification of operational resources and assignments. It also may include attachments that provide direction and important information for management of the incident during one or more operational periods.
Incident Command Post	The field location at which the primary tactical-level, on-scene incident command functions are performed. The ICP may be collocated with the incident base or other incident facilities.
Incident Command System	A standardized on-scene emergency management construct specifically designed to provide for the adoption of an integrated organizational structure that reflects the complexity and demands of single or multiple incidents, without being hindered by jurisdictional boundaries. The ICS is the combination of facilities, equipment, personnel, procedures and communications operating with a common organizational structure, designed to aid in the management of resources during incidents. The ICS is used for all kinds of emergencies and is applicable to small as well as large and complex incidents. The ICS is used by various jurisdictions and functional agencies, both public and private, or organized field-level incident management operations.
Incident Commander	The individual responsible for all incident activities, including the development of strategies and tactics and the ordering and release of resources. The IC has overall authority and responsibility for conducting incident operations and is responsible for the management of all incident operations at the incident site.
Incident Management Team	The IC and appropriate command and general staff personnel assigned to an incident.
Incident of National Significance	An actual or potential high-impact event that requires a coordinated and effective response by and appropriate combination of federal, state, local, tribal, nongovernmental and/or private-sector entities in order to save lives and minimize damage, and provide the basis for long-term community recovery and mitigation activities.
Initial Actions	The actions taken by those responders first to arrive at an incident site.
Initial Response	Resources initially committed to an incident.

Appendix B Acronyms and Glossary

Joint Field Office	The joint field office (JFO) is a temporary federal facility established locally to provide a central point for federal, state, local and tribal executives with responsibility for incident oversight, direction and/or assistance to effectively coordinate protection, prevention, preparedness, response and recovery actions. The JFO will combine the traditional functions of the joint operations center (JOC), the FEMA DFO, and the JIC within a single federal facility.
Joint Information Center	A facility established to coordinate all incident-related public information activities. It is the central point of contact for all news media at the scene of the incident. Public information officials from all participating agencies should collocate at the JIC.
Joint Operations Center	The JOC is the focal point for all federal investigative law enforcement activities during a terrorist or potential terrorist incident or any other significant criminal incident, and is managed by the senior federal law enforcement officer. The JOC becomes a component of the JFO when the NRP is activated.
Mobilization Center	An off-site temporary facility at which response personnel and equipment are received from the point of arrival and are pre-positioned for deployment to an incident logistics base, to a local staging area or directly to an incident site, as required. A mobilization center also provides temporary support services, such as food and billeting, for response personnel prior to their assignment, release or reassignment and serves as a place to out-process following demobilization while awaiting transportation.
Multi-Agency Command Center	First used to describe an interagency coordination center established by DHS/Secret Service during national special security events as a component of the JFO. The multi-agency command center now serves as the focal point for interagency planning and coordination, including the coordination of all incident-related information from other intra- and inter-agency centers (e.g., ICPs, unified area commands, EOCs, and JICs).
Multi-Jurisdictional Incident	An incident requiring action from multiple agencies that each has jurisdiction to manage certain aspects of an incident. In ICS, these incidents will be managed under unified command (UC).
National Incident Management System	A mandated system that provides a consistent, nationwide approach for federal, state, local and tribal governments; the private sector; and NGOs to work effectively and efficiently together to prepare for, respond to and recover from domestic incidents, regardless of cause, size or complexity. To provide for interoperability and compatibility among federal, state, local and tribal capabilities, the NIMS includes a core set of concepts, principles and terminology. HSPD-5 identifies these as the ICS; multi-agency coordination systems; training; identification and management of resources (including systems for classifying types of resources); qualification and certification; and the collection, tracking, and reporting of incident information and incident resources.

Appendix B Acronyms and Glossary

National Response Center	A national communications center for activities related to oil and hazardous substance response actions. The National Response Center, located at DHS/Coast Guard headquarters in Washington, D.C., receives and relays notices of oil and hazardous substances releases to the appropriate federal on-scene coordinator (FOSC).
National Response Team	The national response team (NRT), composed of the 16 federal agencies with major environmental and public health responsibilities, is the primary vehicle for coordinating federal agency activities under the NCP. The NRT carries out national planning and response coordination and is the head of a highly organized federal oil and hazardous substance emergency response network. The EPA serves as the NRT chair, and DHS/Coast Guard serves as the vice chair.
National Special Security Event	A designated event that, by virtue of its political, economic, social or religious significance, may be the target of terrorism or other criminal activity.
Nuclear Incident Response Team	Created by the Homeland Security Act to provide DHS with a nuclear/radiological response capability. When activated, the nuclear incident response team consists of specialized federal response teams drawn from the Department of Energy and/or the EPA. These teams may become DHS operational assets providing technical expertise and equipment when activated during a crisis or in response to a nuclear/radiological incident as part of the DHS federal response.
Principal Federal Official	The federal official designated by the secretary of homeland security to act as his or her representative locally to oversee, coordinate and execute the secretary's incident management responsibilities under HSPD-5 for INs.
Public Information Officer	A member of the command staff responsible for interfacing with the public and media or with other agencies with incident-related information requirements.
Radiological Emergency Response Teams	Teams provided by the EPA's Office of Radiation and Indoor Air to support and respond to incidents or sites containing radiological hazards. These teams provide expertise in radiation monitoring, radionuclide analyses, radiation health physics and risk assessment. Radiological emergency response teams can provide both mobile and fixed laboratory support during a response.
Recovery	The development, coordination and execution of service- and site-restoration plans for impacted communities and the reconstitution of government operations and services through individual, private-sector, nongovernmental and public assistance programs that: identify needs and define resources; provide housing and promote restoration; address long-term care and treatment of affected NRP persons; implement additional measures for community restoration; incorporate mitigation measures and techniques, as feasible; evaluate the incident to identify lessons learned; and develop initiatives to mitigate the effects of future incidents.

Appendix B Acronyms and Glossary

Regional Response Teams	Regional counterparts to the NRT, the regional response teams (RRT) comprise regional representatives of the federal agencies on the NRT and representatives of each state within the region. The RRTs serve as planning and preparedness bodies before a response, and provide coordination and advice to the FOSC during response actions.
Senior Federal Official	An individual representing a federal department or agency with primary statutory responsibility for incident management. Senior Federal Officers utilize existing authorities, expertise and capabilities to aid in management of the incident working in coordination with other members of the JFO coordination group.
Situation Assessment	The evaluation and interpretation of information gathered from a variety of sources (including weather information and forecasts, computerized models, GIS data mapping, remote sensing sources, ground surveys, etc.) that, when communicated to emergency managers and decision-makers, can provide a basis for incident management decision-making.
Threat	An indication of possible violence, harm or danger.
Unified Command	An application of ICS used when there is more than one agency with incident jurisdiction or when incidents cross-political jurisdictions. Agencies work together through the designated members of the UC to establish their designated ICs at a single ICP and to establish a common set of objectives and strategies and a single incident action plan.

Appendix C Pre-Drill Tabletop Guidelines

I. OBJECTIVES

The overarching objective of the pre-drill tabletop is to achieve mutual understanding by key participants of the roles, responsibilities, priorities and response actions of each organization and facility that has a response role in a hostile action-based event. This understanding should contribute to a successful integrated response during the hostile action-based drill.

The following are suggested tabletop outcomes from which specific objectives can be developed. The tabletop should facilitate discussion to familiarize participants on:

Outcomes

How and by what means the licensee will notify off-site first responders of the hostile action-based event (i.e., who will make the notification, what communications link will be used, who will receive it, and to whom and by what means the notification will be relayed among off-site agencies)

Initial site security actions in response to the event.

The operating crew's actions per hostile action-based operating procedures:

- procedures for declaring an emergency classification and for notifying off-site authorities.

Initial off-site responder actions upon notification by the licensee:

- site access requirements for off-site first responders
- reporting location of off-site first responders.

How the ICP would be established:

- who is in charge of the overall response and how transitions in command and control would take place as the scenario evolves
- key support personnel who will be reporting to the IC and their respective functions
- how off-site first responders obtain turnover from and integrate with the site response
- primary and backup means of communications among site facilities, response personnel and the ICP.

Radiation protection provisions made for off-site responders to the site.

Communication mechanisms that are available to site responders and that can support communications among the operating crew, site security and the ICP.

How the decision to allow activation of the station ERO will be made and considerations involved in allowing ERO activation while ensuring the safety of ERO personnel in transiting to their emergency facilities:

- method that will be used to notify ERO personnel of ERO activation
- mustering locations of station ERO personnel and alternate facilities that will be utilized, if any
- credentials required for ERO personnel returning to the site to access through off-site law enforcement access controls.

How the ICP will be apprised of and understand operational priorities for restoration of damaged plant equipment and for application of fire fighting resources.

Management of the on-site emergency medical response to triage, treat and transport injured personnel and utilization of off-site medical resources.

Informational requirements of off-site public protection decision-makers.

Public PADs appropriate to the event.

Appendix C Pre-Drill Tabletop Guidelines

Outcomes

How and when the public alert and notification systems will be implemented:

- coordination and dissemination of public information from the outset of the event prior to ERO activation and subsequently via activation of the JIC.

Crime scene preservation.

II. PREPARATION

Preparation guidelines emphasize early involvement of off-site stakeholders, particularly the first responder organizations, in the design of the pre-drill tabletop and the selection of key participants. The off-site official who will serve as the IC, or a designee of the IC, should have a role in such preparation activities as selecting participants, establishing objectives, designing the scenario, arranging the room layout and deciding who will facilitate. In short, the tabletop should be a partnership of the lead off-site sponsor organization and the site EP organization.

Preparation Guidelines

Identify the lead off-site sponsor organization. Ideally, the IC represents the lead off-site sponsor organization and is the person who participates in preparing the tabletop.

Develop a relatively simple, straightforward scenario that postulates the attack on the plant and consequences that require a range of off-site responses.

Review the scenario with the off-site sponsor to ensure that it involves the desired range of off-site participation

With the off-site sponsor, identify off-site organizations that will be invited to participate in the tabletop.

With the off-site sponsor, select a date, time and location for the tabletop. This activity may require the off-site sponsor and site EP staff to consult with other participating organizations to obtain as much mutual agreement as possible.

Issue a joint invitation from the off-site sponsor and the site EP organization to the identified participant organizations. The invitation should identify the overarching purpose of the tabletop and the specific persons from the invited organization who are being asked to attend.

The off-site sponsor and site EP staff meet with selected key participants (e.g., lead LLEA, lead fire-fighting organization, emergency management officials) to review the tabletop scenario and timeline and to solicit their suggestions for conducting the tabletop. Suggested outcomes from this activity are:

- given the scenario, determine what the agencies perceive as their role and extent-of-play
 - determine what the agencies want to learn from the tabletop as a guide for the facilitator
 - determine which agencies will have a lead role at different stages of the timeline
 - provide the agencies' the opportunity to think about their individual extents-of-play as the tabletop scenario evolves and how the command structure may change
 - establish ownership of key off-site participants in their respective roles in the tabletop.
-

Appendix C Pre-Drill Tabletop Guidelines

Preparation Guidelines

The off-site sponsor and site EP staff determine the room layout for the tabletop. Thought should be given to locating the various organizations in the room to achieve maximum interaction and communication among key participants at the various stages of the scenario. For example, the IC and other key first response organizations will be located together at one table to represent the ICP and other NIMS command structure entities. The room arrangement should facilitate communication between this location and initial on-site response personnel (i.e., site security and the control room). A suggested arrangement includes licensee representation with ICP personnel to facilitate communication and understanding of plant information important to fire fighting and law enforcement priorities and strategies.

Figure C-1 depicts a sample organizational arrangement for a hostile action-based tabletop.

In addition to the organizational arrangement depicted in Figure C-1, observers and other non-participants should be located in peripheral areas of the room so as not to interfere with participant interaction. A nearby break-out location may be designated for security personnel in the event safeguard discussions become necessary.

III. CONDUCT

The tabletop should be co-facilitated by on-site and off-site representatives in accordance with a scenario and timeline of events. Each participant should be provided with a diagram of the tabletop facility layout that identifies the participating organizations. Each participant should also be provided a list of participants, their emergency response titles and the organizations they represent. A typical sequence for conduct of the tabletop is provided below:

Conduct Guidelines

Prior to the participants' arrival, set up the facility in accordance with the arrangement of participating organizations as shown on the tabletop specific layout diagram. Each table should display a sign readable by all participants that identifies the represented organization. A name and position placard should identify individual participants.

Depending on the size of the room and how far participants are situated from one another, a sound system and microphones may aid discussion.

Designate a non-participant to take notes of the discussion, identify "parking lot" issues, and recap major points of discussion and issues at the conclusion of the tabletop.

A facilitator should have participants introduce themselves in order of the organizational arrangement of the tabletop. Participants should state their names, organization, emergency position and a brief statement of their emergency role.

The tabletop should be facilitated by an on- and off-site cosponsor to represent the on-site/off-site responder partnership and to encourage maximum engagement by the participants.

The on-site facilitator cautions participants to avoid open discussion of safeguards information and informs them that accommodations have been made for separate, secure safeguards discussions by LLEA and site security personnel if necessary.

The facilitator(s) initiate the scenario by stating the initiating conditions and by eliciting the initial response actions by site personnel. This initial segment of the scenario would include the process of threat identification and notifications to on-site personnel and off-site first responders.

Appendix C Pre-Drill Tabletop Guidelines

Conduct Guidelines

A short break may follow this initial segment to allow the notified organizations to review their response actions internally (at their respective tables) and prepare to present them to all tabletop participants.

If necessary, the facilitator(s) should lead the discussion to address information requirements of each organization and how communications will occur among emergency facilities.

Facilitator(s) should also lead the discussion to identify the conditions required for activation of the station ERO and how ERO activation will occur. This segment should include discussion of the transition of licensee's command and control structure and how this transition is communicated to the off-site responders. Included in this segment is the means of coordination between the station ERO and the ICP.

The facilitator(s) advance the timeline of the scenario segment by segment, eliciting response actions of each participating organization and emergency response function.

If a time jump is used to separate initiating conditions and responses in part 1 and ERO/ORO response actions in part 2, facilitators should allot time (~15 minutes) for responders to adequately prepare for part 2. Allow participants to organize the initial conditions that are the part 2 actions they have already taken and prepare to present their initial conditions to the tabletop group as a whole.

IV. CRITIQUE AND FOLLOW UP

At the conclusion of the tabletop discussion, the facilitator(s) should request that each table conduct its own critique and identify issues presented to its response by the tabletop. Allow ~15 minutes for each table to complete this activity. Participants should be asked to focus on issues that impeded an integrated response.

Critique and Follow-up Guideline

The organization lead at each table should be asked to present the critique items and issues to the tabletop group. A person should be designated to record critique items and issues identified by each table on a display for everyone to see.

After presentation of critique items and issues by each table, the critique should be open to all participants and observers.

Issues requiring further action should be identified and the actions assigned to appropriate personnel.

A report of the tabletop should be issued to the participants prior to the drill.

Ensure any resolutions are communicated to the appropriate participants prior to the drill.

Appendix C
Pre-Drill Tabletop Guidelines

