

COMMISSION BRIEFING SLIDES/EXHIBITS

**MEETING WITH FEMA AND
STATE/LOCAL REPRESENTATIVES ON
OFFSITE EMERGENCY PREPAREDNESS ISSUES**

AUGUST 12, 2008



EMERGENCY PREPAREDNESS (EP) INITIATIVES: Meeting with FEMA, State and Local Representatives

Cooperation and Collaboration

- Historical Perspective
- Joint Initiatives
- Continuing Outreach

Hostile Action-Based (HAB) EP Drills

- What are HAB drills?

<http://www.nrc.gov/about-nrc/emerg-preparedness/respond-to-emerg/hostile-action.html>

- Status

- Lessons Learned

- Incident Command System
- Emergency Response Organization Mobilization
- Protective Action Decision-making
- Timely Communications With Public

Challenging Exercise Scenarios

- Avoid Preconditioning
 - Varying Event Escalation Conditions
 - Varying Release Conditions
 - Varying Initiating Events
- Informed Process (Stakeholder Input)
 - Focus Groups
 - Public Meetings

Moving Forward

- Rulemaking and Guidance Changes
- Coordinated Scheduling
- Challenges



FEMA

Meeting with FEMA, State and Local Representatives on Offsite Emergency Preparedness Issues

R. David Paulison, Administrator, FEMA

**Dennis Schrader, Deputy Administrator, National
Preparedness, FEMA**

James Kish, Director of Technological Hazards, FEMA



FEMA

August 12, 2008



Agenda

- Hostile Action-Based Drills**
- Exercise Scenarios**
- FEMA Guidance Revisions and Support of NRC Rulemaking**
- Leverage Ongoing Initiatives of National Preparedness**
 - HSEEP
 - Integrated Planning System





Hostile Action-Based Drills

- Primary issue identified during drills: Coordination between onsite (licensee) and offsite response organization (ORO) resources**
 - Licensees and OROs may have different protocols for responding to hostile action based events
 - Additional Federal agency resources (e.g., FBI, DHS, DOE) will need to be included

- REP Program exercise requirements will need to still be demonstrated through an alternate means (if not during the biennial exercise) for FEMA to maintain “reasonable assurance”.**

- In-Progress Review (IPR) planned for late September 2008**
 - Provide status to and solicit additional input from stakeholders
 - Exact date and location TBD





Exercise Scenario Design and Development

- Task Force is proposing to increase scenario realism within the 6-year exercise cycle to include:**
 - “No” or minimal release
 - Variance of release conditions (e.g., ground, elevated, puff, continuous)
 - Non-sequential escalation of Emergency Classification Levels (ECLs)
 - Relax the need to escalate to General Emergency at every exercise
 - Incorporate hostile action, local hazards, and seasonal conditions into exercise schedule

- Issues resulting from exercise scenario changes:**
 - Exercises will need to balance hazards (e.g., natural, technical, hostile action) while preserving the essential objectives that form the basis of ‘reasonable assurance’ core to the REP program
 - Incorporating all hazards events into REP presents new functions and criteria to evaluate that are not currently addressed in REP exercises and in some cases require development of success criteria
 - Balancing increased flexibility into the development of scenarios and extents of play for REP exercises

- Grant constructive credit for other exercise and real life events**
 - Incorporate the tenets of HSEEP
 - Guidance on this will be included in the Draft REP Program Manual





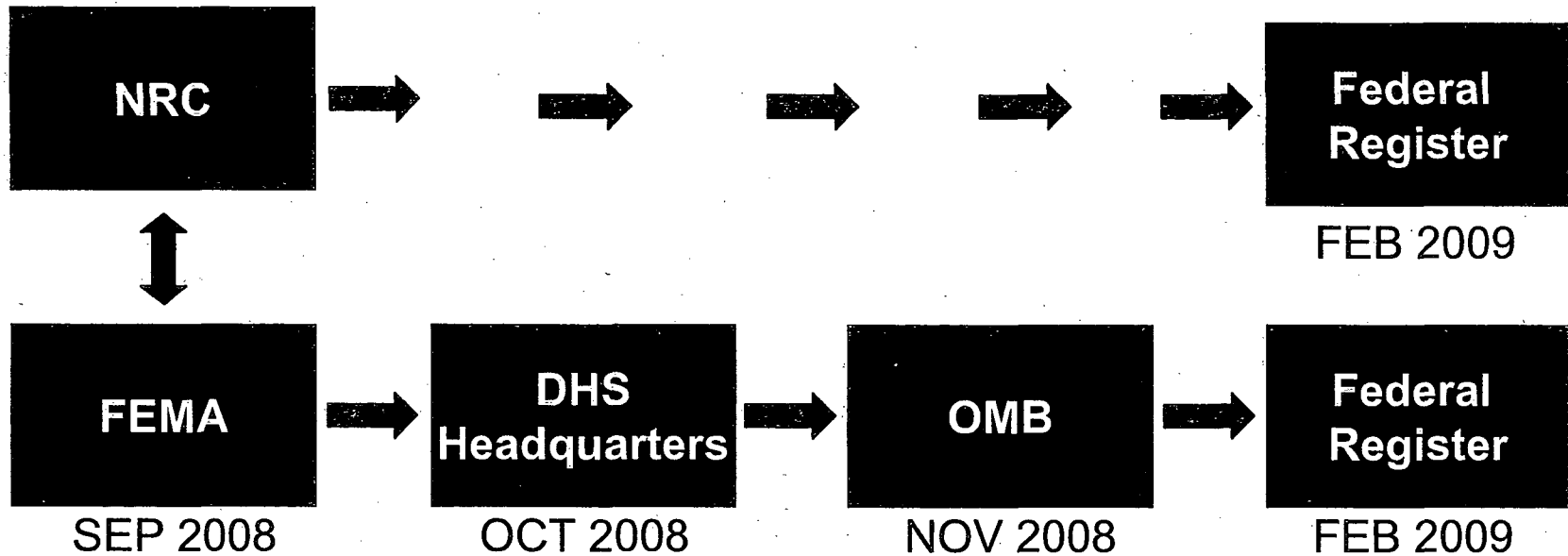
FEMA Guidance Revisions and Support of NRC Rulemaking

- Goal is to align NRC rulemaking and FEMA guidance revisions with current national preparedness initiatives**
- Update of REP Program Manual will be NIMS and HSEEP compliant, incorporate Hostile Action Based initiating events and allow for scenarios that reduce predictability**
- FEMA/NRC relationship has evolved to ensure alignment**
 - FEMA/NRC Exercise Scenario Task Force
 - Joint FEMA/NRC effort to solicit and incorporate stakeholder feedback
 - Accelerated rulemaking process
- Strategy to preserve these efforts following the election under development**





Federal Register Publication Processes





FEMA



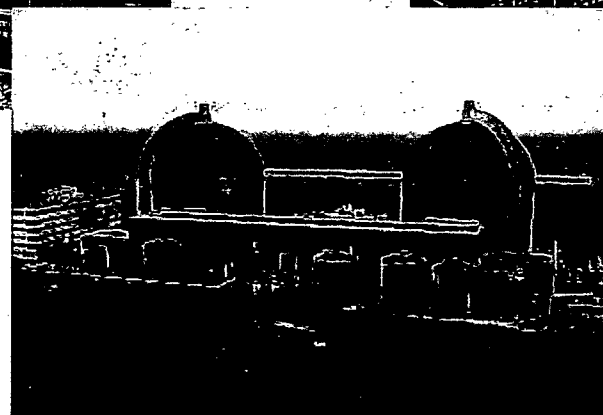
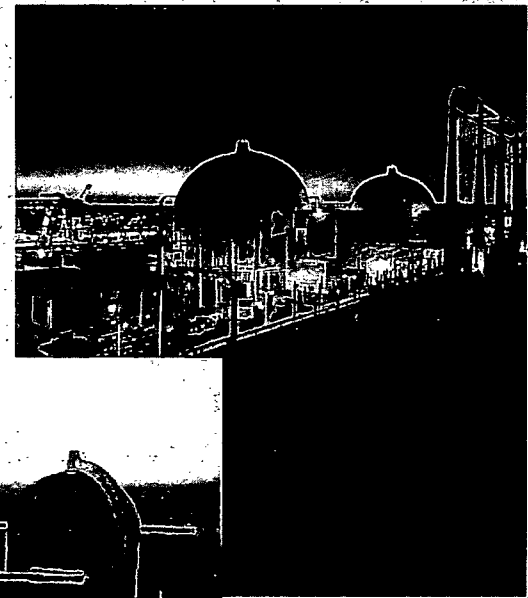
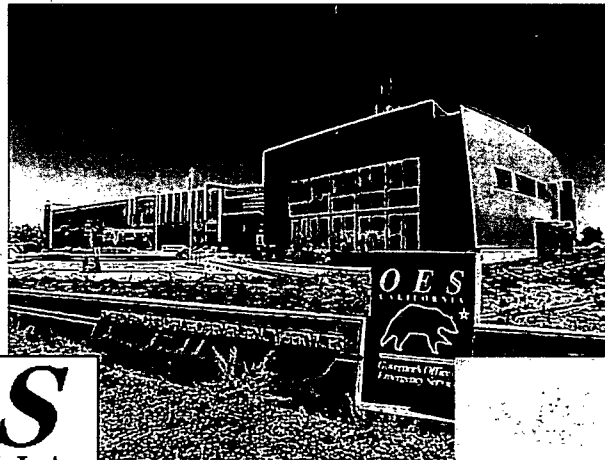
FEMA



Homeland
Security

Governor's Office of Emergency Services

Christina Curry, Deputy Director



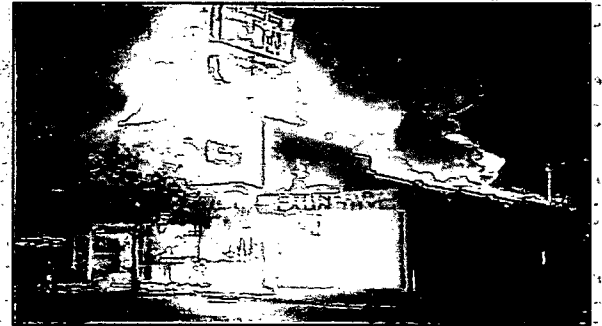
Governor's Office of Emergency Services

August 12, 2008

NRC Briefing

OES Mission

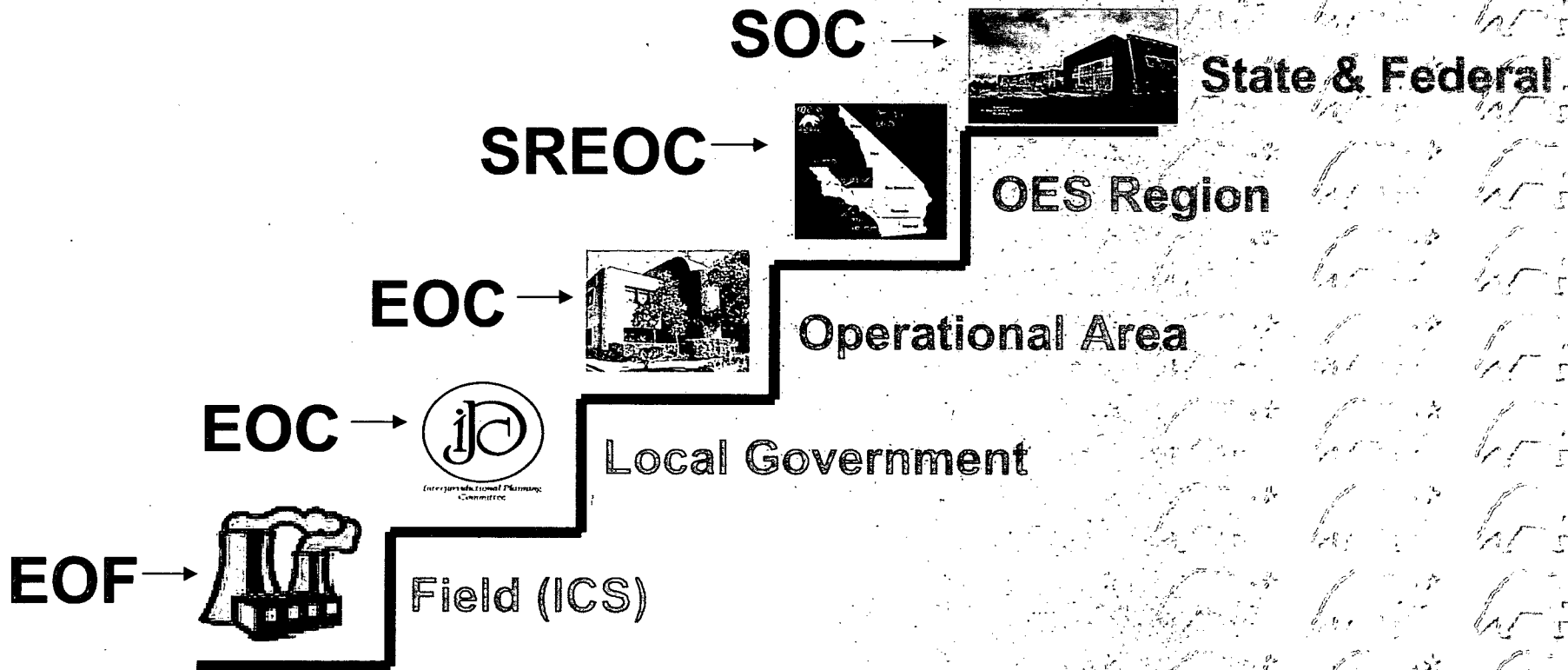
Under the authority of the Emergency Services Act and other legislation, OES mitigates, plans and prepares for, responds to, and aids in recovery from the effects of emergencies that threaten lives, property, and the environment.



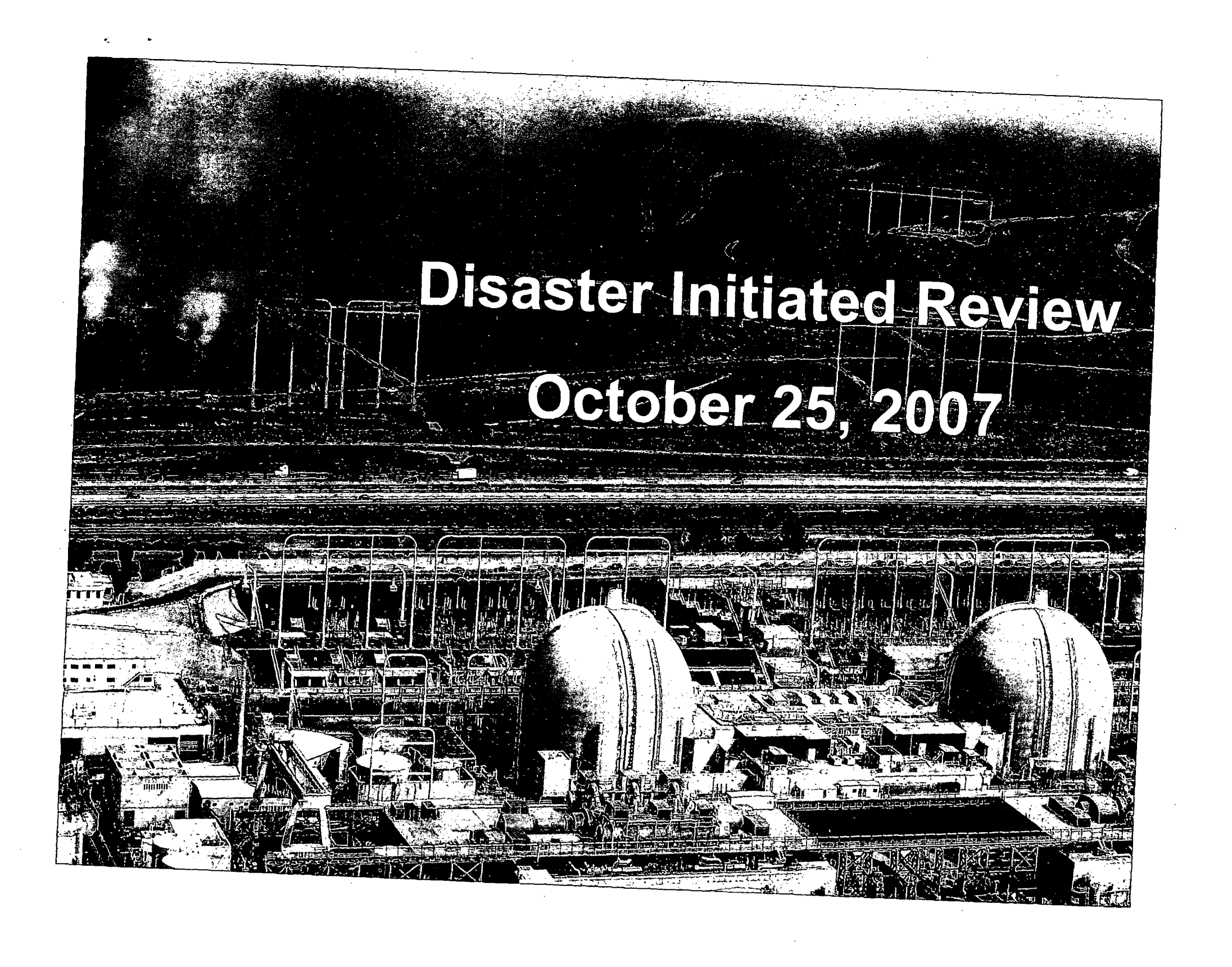
Governor's Office of Emergency Services

Standardized Emergency Management System

Nuclear Power Preparedness Response



Governor's Office of Emergency Services



Disaster Initiated Review

October 25, 2007

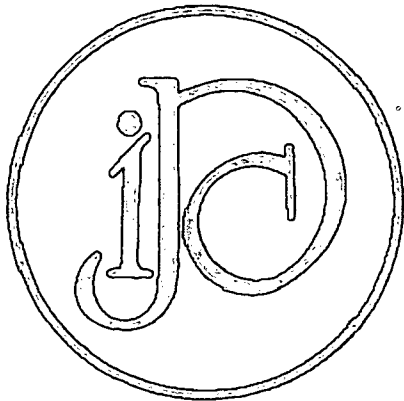
Coordination Strategies

- **Established Systems And Relationships Are Key**
- **Effective Communication And Coordination With Our Program Partners**
- **Opportunities For Continuous Improvement**

Offsite EP Initiatives –

A California Local Perspective on Hostile Action Based Drills and Exercise Scenarios

Aug 12, 2008



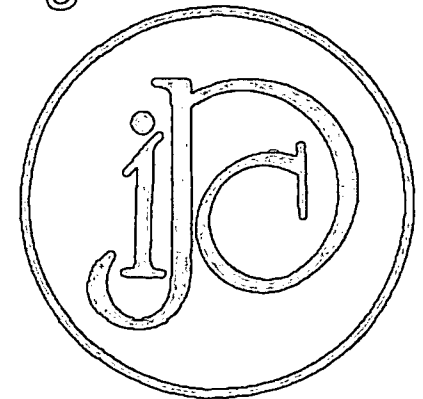
Mike Rose

Emergency and Support Services Manager
City of Dana Point, California

SONGS Interjurisdictional Planning Committee
Chairman

What is the Interjurisdictional Planning Committee (IPC)

- Codified by CA Health & Safety Code (§114650a7) in 1981
- Representatives from the Offsite Responding Organizations responsible for the protection of the public's health and safety
- Promote nuclear power preparedness through agency coordination and integration of emergency plans

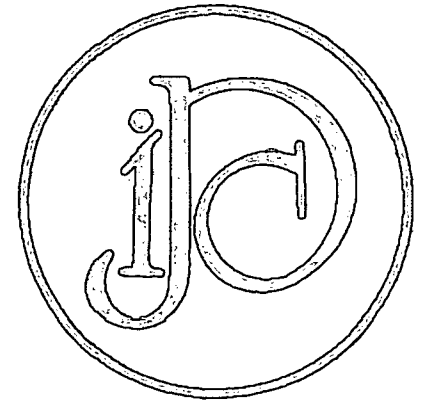


Primary Members:

City of San Clemente
City of Dana Point
City of San Juan Capistrano
County of Orange
County of San Diego
California Dept. of Parks &
Recreation
USMC Camp Pendleton
Southern California Edison

Associate Members:

California Highway Patrol
American Red Cross
Capistrano Unified School District
Orange County Fire Authority
Oceanside Fire Department
Mission Hospital and Regional
Medical Center
CA OES
FEMA
NRC



Challenges and Lessons Learned from Hostile Action-Based Scenarios

- Challenges

- Integrated Law Enforcement Plan was developed by and for law enforcement, separate from the existing REP planning
- Emergency response to an incident scene, and the evaluation of ICS is not part of a traditional REP exercise
- Coordination of protective action decision making between Incident Commanders and EOC's
- High turn-over rate of first responder personnel having knowledge of the plan (new players)

Challenges and Lessons Learned from Hostile Action-Based Scenarios

- Lessons Learned

- The Law Enforcement Plan for hostile action based scenarios, including Incident Command System and Unified Command, must be integrated into established Multi-Hazard Response Plans
- REP training needs to be incorporated into first responder training
- Qualified ICS expert should evaluate the Unified Command structure and response actions
 - One size does not fit all
 - Evaluation must be based on results, not a “checklist”

Spectrum of Exercise Scenarios (IPC perspective)

- Exercise Scenarios
 - Goals
 - Continuous improvement of responder preparedness
 - Realistic scenarios that enhance our capabilities and advance our training programs
 - Flexibility and Variety
 - Different scenarios with different ECLs
 - Hostile action based scenarios should be incorporated into 6-year cycle
 - Variety of initiating events and outcomes

Spectrum of Exercise Scenarios (IPC perspective)

- Exercise Scenarios
 - Licensee should partner with OROs to develop exercise scenario to meet the training needs of both, i.e. “Exercise by Objective”
 - All REP Exercise scenarios, should be based on a logical and realistic progression of events
 - General Emergency declarations (in every scenario) create predictability
 - Predictability breeds complacency and negative training
 - Scenarios resulting in less than “worst case” outcomes still exercise offsite emergency plans
 - REP Exercise development should be fully integrated into DHS HSEEP requirements

ILLINOIS' PERSPECTIVE ON OFFSITE EMERGENCY PREPAREDNESS

HOSTILE ACTION-BASED DRILLS

CHALLENGES, LESSONS LEARNED, AND
IMPROVING STAKEHOLDER COORDINATION

Joe Klinger
Assistant Director
Illinois Emergency Management Agency
Division of Nuclear Safety

OVERVIEW

- State of Illinois participates in numerous exercises each year
 - Six nuclear plant sites in Illinois
 - Three Radiological Emergency Preparedness (REP) exercises per year, plus three associated pre-drills
 - In 2007 and 2008, this increased with two tabletops and two hostile action-based drills per year
 - Amount of effort, e.g. messages, coordination, and data development, is at least as much as that required in a normal REP exercise

LESSONS LEARNED

- Rev 1 to NEI 06-04 is a good methodology for the way hostile action drills are conducted
- Stay with REP drill concepts; no need to reinvent the wheel
- Tabletops were very valuable in improving inter-agency coordination, cooperation, and communications
- In a hostile action drill the radiation threat is secondary unlike a typical REP Exercise

LESSONS LEARNED

- When radiation is not the primary threat shelter in place becomes the preferred strategy
- Licensee reluctant to use the “impediment clause” in their procedures
- Our standard REP procedures are still effective and used in response to a hostile action scenario: predictive dose assessment, KI evaluation, protective action recommendation process
- The radiological field component is also deployed in the response
- The radiological response liaisons are also deployed: JIC, TSC, EOF and affected counties

THE CHALLENGE

- Everyone is already busy with required exercises and real events
- The additional two Hostile Action tabletops and two drills to the existing three REP exercises and pre-drills have stretched available resources
- Going forward, the hostile action drills need to be used as one of the existing REP exercises in the six year exercise cycle.

SPECTRUM OF EXERCISE SCENARIOS

- The extent of play must allow flexibility:
 - Exercise scenarios must be realistic otherwise training is negative
 - Source terms used must reflect simulated accident conditions
 - Scenarios must vary so that players do not anticipate actions always happening at prescribed times
 - Allow non-sequential classification progression

SPECTRUM OF EXERCISE SCENARIOS

- Guidance should be flexible to include a wide spectrum of accidents and release types from no release to major core failure
- A release is not required to ensure protective action recommendation analysis is adequate
- Response activities can be demonstrated without a release occurring, i.e., field team deployment and environmental monitoring

INTEGRATED EMERGENCY MANAGEMENT

- In Illinois there is already strong integration of resources among the various counties and the State
- Illinois has established the State Terrorism and Intelligence Center (STIC) to coordinate all security threats
- Illinois Mutual Aid Agreements are in place, i.e. fire, law enforcement, and public health
- Illinois has addressed interoperability issues by instituting a common radio platform – StarComm21

CONCLUSION

- Hostile Action drills have provided additional learning opportunities for utilizing existing and new resources and interfaces
- Hostile Action drills are programmatically equivalent to the standard REP exercises and should be treated accordingly
- Hostile Action drills should be integrated into the current REP Program
- Concerns exist that the Hostile Action drills will become an additional required drill and that prescriptive criteria will be required in extent of play

Proposed REP Program Changes

State of Ohio



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Nancy Dragani, Executive Director



Ohio Emergency Management Agency, a Division of the Ohio Department of Public Safety

Challenges and Lessons-Learned from Hostile Action-Based EP Drills

- Ohio has participated in one hostile action-based drill – 9/12/2007 with PNPP
- Protective action recommendations and decisions require new considerations
- ICS integration into REP Planning – particularly protective action decisions



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Challenges and Lessons-Learned from Hostile Action-Based EP Drills

- First Responders are now engaged on-site rather than with traditional off-site REP duties
- Many state and local personnel gravitated toward standard REP exercise concerns
- Development of planning standards must accompany changes to exercise requirements



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Spectrum of Exercise Scenarios

- Varying exercise scenarios are needed to avoid a programmed response – minimize predictability
- Current exercise guidelines do not allow the scenarios to be varied sufficiently
- A spectrum of scenarios will promote realistic discussions regarding actions to be taken, rather than an automatic completion of default actions
- Exercise scenarios should cover less severe accident scenarios (no release) as well as the very improbable most severe cases



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Spectrum of Exercise Scenarios

- Excessive out-of-sequence activities or activities driven by controller injects should be avoided
- Probability, possibility, and realism
- A balance must be achieved with respect to the responsibility to exercise all aspects of the response, realism, and predictability



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Improving Coordination

- Improve REP program guidance to ensure requirements are clear and applied uniformly across FEMA regions and through the NRC to licensees.
- NRC / FEMA alignment on exercise issues is paramount
- Increased federal participation during exercises would be beneficial
- Ensure the integration of REP with more recent FEMA initiatives



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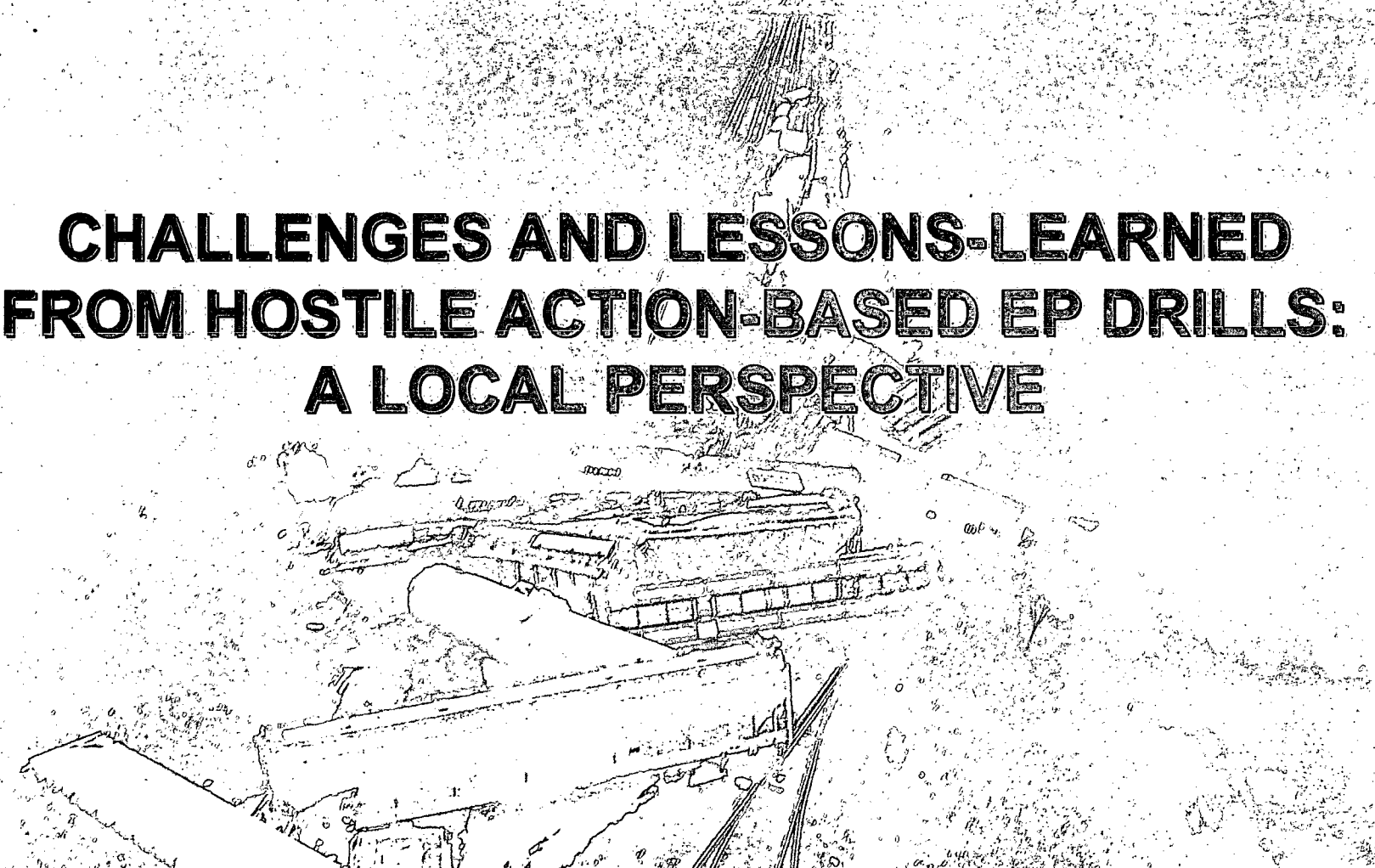
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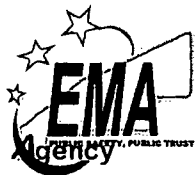
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CHALLENGES AND LESSONS-LEARNED FROM HOSTILE ACTION-BASED EP DRILLS: A LOCAL PERSPECTIVE



**Larry Greene-Director
Lake County (OH) Emergency Management Agency**

BENEFICIAL TRAINING

Experience with a Hostile Action-Based EP Drill proved valuable for the following reasons:

- It challenged traditional off-site response in a realistic manner. Identified operational gaps in Unified Command and Emergency Operations Center (EOC) management at the local level
- Demonstrated the need for interaction between varied agencies and levels of government. Did so in a positive “no-fault” learning environment
- Revealed shortfalls in tactical communications and Public Information coordination specific to hostile action-based scenarios

HOSTILE ACTION-BASED EP DRILLS: THE LOCAL CHALLENGES

- Demonstrate the ability to implement “near-site” command and control at a nuclear plant-related incident.
- Field a coordinated (tiered) response employing National Incident Management System (NIMS) and Incident Command System (ICS) concepts
- Secure participation of the Off-Site Response Organization (ORO) and first-responder community to achieve desired objectives

HOSTILE ACTION-BASED EP DRILLS: “REAL WORLD” CONSIDERATIONS

What are your available “day-to-day” assets and resources?

How quickly can they be mobilized and supported? (mutual aid plans)

What are your communications capabilities (on-site and off-site)?

How well does your local Emergency Operations Plan (EOP) integrate with drill objectives?

HOSTILE ACTION-BASED EP DRILLS: NIMS and ICS Application

How are NIMS and ICS implemented locally and at the state level? How does governmental structure (home rule, etc) impact coordination?

How does Incident Command, Unified Command and the Emergency Operations Center (EOC) integrate to support a Multi-Agency Coordination system?

HOSTILE ACTION-BASED EP DRILLS: NIMS and ICS Training

What level of cross-discipline NIMS training has been achieved to date?

Have non-traditional responders (government officials, volunteers, etc) been trained?

Are roles and responsibilities clear?

HOSTILE ACTION-BASED EP DRILLS: SCENARIO SPECTRUMS

LESSONS LEARNED:

- Include key stakeholders early-on and throughout the drill planning process
- Don't overcomplicate the scenario-keep it challenging but realistic
- Consider the jurisdiction's existing capabilities, resources and mutual-aid plans when developing scenario
- Focus on integration between on-site and off-site response organizations
- Create "success paths" through facilitated discussion and participant interaction

QUESTIONS?

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