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**FEMA**

AUG 29 2011

NRC Headquarters' Document Control Desk  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555-0001

To whom it may concern:

Enclosed is the After Action Report for the Three Mile Island Nuclear Generating Stations (TMI) Medical Services (MS-1) Drill that was evaluated on April 27, 2011. The West Shore Emergency Medical Services and Carlisle Regional Medical Center participated in the drill.

There were no "Deficiencies" or "Areas Requiring Corrective Action (ARCA)" identified during the drill.

Based on the review of the offsite radiological emergency response plans and procedures submitted, FEMA Region III has determined they are adequate and there is reasonable assurance they can be implemented, as demonstrated during the TMI MS-1 Drill.

If you have any questions, please contact Darrell Hammons at (215) 931-5546.

Sincerely,

A handwritten signature in blue ink, appearing to read "MaryAnn Tierney".

MaryAnn Tierney  
Regional Administrator

Enclosure

A 445  
MPK



Three Mile Island Nuclear Generating Station

# After Action Report/ Improvement Plan

Drill Date - May 24, 2011

Radiological Emergency Preparedness (REP) Program



**FEMA**

*Published August 17, 2011*

**Unclassified**  
**Radiological Emergency Preparedness Program (REP)**

**After Action Report/Improvement Plan**

**Three Mile Island Nuclear Generating Station**

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# Three Mile Island Nuclear Generating Station After Action Report/Improvement Plan

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## **EXECUTIVE SUMMARY**

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351, and 352. These regulations are a key element in the Radiological Emergency Preparedness Program (REPP) that was established following the Three Mile Island Nuclear Station accident in March 1979. In October 2005, the REP Program was moved to the Department of Homeland Security/Federal Emergency Management Agency/Radiological Emergency Preparedness Program (DHS/FEMA/REPP).

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

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

- The review and evaluation of Radiological Emergency Response Plans (RERPs) developed by State and local governments;
- The evaluation of exercises conducted by State and local governments to determine whether such plans can be implemented;
- Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993 (44 CFR Part 354, Appendix A, September 14, 1993), now under revision to reflect DHS responsibilities;
- Coordinating the activities of the following Federal agencies with responsibilities in the radiological emergency planning process:
  - U.S. Department of Agriculture
  - U.S. Department of Commerce

- 
- U.S. Department of Defense
  - U.S. Department of Energy
  - U.S. Department of Health and Human Services
  - Food and Drug Administration
  - Center for Disease Control
  - U.S. Department of Housing and Urban Development
  - U.S. Department of the Interior
  - U.S. Department of Justice
  - U.S. Department of State
  - U.S. Department of Transportation
  - U.S. Department of Veterans Affairs
  - U.S. Environmental Protection Agency
  - General Services Administration
  - National Aeronautics and Space Administration
  - Nuclear Regulatory Commission
- 
- Providing regulatory oversight, rule-making and guidance, as necessary.

A REP Medical Services Drill was evaluated on May 24, 2011, by FEMA, Region III REPP to assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving the Three Mile Island Nuclear Generating Station (TMI). The purpose of this report is to present the drill results and findings on the performance of the offsite response organizations (OROs) during a simulated radiological emergency involving a radiologically contaminated, injured individual.

Please note that throughout this report the terms Drill and Exercise may be used synonymously. The findings presented in this report are based on the evaluations of the Federal evaluator team, with final determinations made by the Regional Assistance Committee Chairperson from FEMA, Region III, and approved by DHS/FEMA/REPP Headquarters. There were no Deficiencies, Areas Requiring Corrective Action, or Planning Issues identified as a result of this exercise/drill.

The criteria utilized in the DHS/FEMA/REPP evaluation process are contained in the following:

- NUREG-0654/FEMA-REP-1, Rev. 1, "Criteria for Preparation and Evaluation of Radiological

Emergency Response Plans and Preparedness in Support of Nuclear Power Plants,” November 1980;

- FEMA Guidance Memoranda MS-1, “Medical Services,” November 1986;
- FEMA-REP-14, “Radiological Emergency Preparedness Exercise Manual,” September 1991;  
and
- 67 FR 20580, “FEMA Radiological Emergency Preparedness: Exercise Evaluation Methodology,” April 25, 2002.

Section 1 of this report, entitled “Exercise Overview,” contains basic details of the exercise/drill, the exercise planning team, and participating agencies.

Section 2 is titled "Exercise Design Summary" and includes the Purpose and Design, a description of the Objectives, Capabilities and Activities, and the Scenario Summary.

Section 3 is the "Analysis of Capabilities. It describes the overall Evaluation and Results and the Summary Results of Evaluation. It identifies the specific participants, the criteria that were evaluated, and indicates if the criteria were or were not met.

Section 4 expresses the "Conclusion" resulting from the exercise.

Appendix A identifies the Drill Evaluators and Team Leaders.

Appendix B catalogs the Acronyms and Abbreviations used in this report.

Appendix C is the Exercise Plan and contains the Exercise Plan, Extent of Play, and Controllers Handbook.

Appendix D is titled Improvement Plan. However, because there were no "Deficiencies," "Areas Requiring Corrective Action," or "Planning Issues" assessed in this drill, the Improvement Plan is not applicable.



### EPZ Description:

The TMI Generating Station (40° 9' 12" N/76° 43' 25" W) is a nuclear power plant operated by Exelon Nuclear. The site consists of two pressurized water-type units. Unit One is an 819-megawatt (MW) reactor, and Unit Two is a 906-MW reactor. Unit 1 received its license in June 1974 and began commercial operation in September 1974. Unit 2 began commercial operation in February 1978; it was damaged in March 1979 and has been shut down and placed in a monitored storage mode.

The minimum exclusion distance specified for the TMI plant is 2,000 feet. Included within the 2,000-foot radius are a portion of Three Mile Island, a portion of Shelly Island, and a portion of the Susquehanna River. Exelon Nuclear and GPU Nuclear Corporation own all the land within the exclusion area.

The TMI plant is located in south-central Pennsylvania in Londonderry Township, Dauphin County. The site is part of an 814-acre tract consisting of several adjacent islands in the Susquehanna River. The power plant is located on Three Mile Island, which is one of the largest islands of the group. The site is at an elevation of 300 feet above mean sea level, relatively flat, and wooded on the periphery and the southern portion. Of the 470 acres that make up the island, the plant occupies approximately 200 acres in the northern portion.

Soils on the island are of the Duncannon-Chavies-Tioga Association, which is comprised of deposits of alluvial sand, silt, and clay. Underlying bedrock is red sandstone and shale.

The normal pool elevation of the Susquehanna River in this area is 277 feet above msl. Hills on both sides of the river in this vicinity rise to elevations of over 500 feet. The plant grade is 300 feet above msl.

An access bridge for plant personnel connects State Route 441 with the north end of the island. A wooden bridge connects the southern portion of the island with State Route 441. Conrail lines are located on both sides of the river; the closest is a one-track line adjacent and parallel to Route 441 on the east shore.

The area within 10 miles of the TMI Nuclear Power Station is located in south-central Pennsylvania, and includes portions of Cumberland, Dauphin, Lancaster, Lebanon, and York

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counties. The site is surrounded mostly by farmland within a 10-mile radius. The nearest community is Goldsboro Borough, on the west shore of the Susquehanna River, 1 mile from the plant. The nearest major population center with more than 25,000 people is Harrisburg (population 53,624), which lies just over 10 miles to the north.

Twenty-three industrial firms are located within a 5-mile radius; they employ approximately 2,400 people. The Harrisburg International Airport is located 2 miles northwest of the TMI plant. An NRC estimate of aircraft risk to TMI Units One and Two indicates an acceptably low risk for either unit, provided fewer than 2,400 operations per year are by aircraft in excess of 200,000 pounds. The NRC requires Exelon to continue periodic monitoring and reporting of airport usage and will reevaluate the adequacy of plant protection if aircraft traffic is reliably projected to exceed 2,400 operations per year. The major railroads operating in the EPZ include Amtrak, Blue Mountain and Ridge, Chessie System, Conrail, and the Maryland and Pennsylvania Railroad.

The climate of the five-county risk EPZ is mild and humid. Weather is variable because the prevailing westerly winds bring both high- and low-pressure systems through the area every few days. Average annual precipitation for the southern portion of the county is about 38 inches, and the average annual temperature is 52 degrees F.

On the basis of the 2000 census, the total population of the 10-mile EPZ is 201,800. There are 97 sirens used to provide coverage of the plume exposure pathway EPZ. The county in which it is located operates each siren system.

## **SECTION 1: EXERCISE OVERVIEW**

### **1.1 Exercise Details**

**Exercise Name**

Three Mile Island Nuclear Generating Station

**Type of Exercise**

Drill

**Exercise Date**

May 24, 2011

**Program**

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

**Scenario Type**

Radiological Emergency

### **1.2 Exercise Planning Team Leadership**

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## 1.3 Participating Organizations

Agencies and organizations of the following jurisdictions participated in the Three Mile Island Nuclear Generating Station drill:

State Jurisdictions

Pennsylvania Emergency Management Agency

Risk Jurisdictions

Cumberland County Office of Emergency Preparedness

West Shore EMS

Private Organizations

Exelon Nuclear Corporation

**Federal Jurisdictions**

**Federal Emergency Management Agency**

## **SECTION 2: EXERCISE DESIGN SUMMARY**

### **2.1 Exercise Purpose and Design**

On May 24, 2011, the Federal Emergency Management Agency (FEMA), Region III, conducted a medical services (MS-1) drill in relation to the Three Mile Island Nuclear Generating Station (TMI). The purpose of the drill was to assess the level of State and local preparedness in responding to a radiological medical emergency. This drill was held in accordance with FEMA's policies and guidance concerning the exercise of State and local Radiological Emergency Preparedness Response Plans (RERP). The most recent evaluated medical drill at this site was conducted on June 5, 2009.

FEMA, Region III, wishes to acknowledge the efforts of the many individuals in the Commonwealth of Pennsylvania, Cumberland County, PA, as well as the West Shore EMS and the Carlisle Regional Medical Center, who participated in this drill.

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

### **2.2 Exercise Objectives, Capabilities and Activities**

The objective of the TMI Medical Services MS-1 Drill was to demonstrate that the response organizations have the personnel, equipment, training, and knowledge to effectively assess the condition of a potentially radioactively contaminated patient, protect against cross contamination, transport, and transfer the patient to a hospital where the patient can then be decontaminated and treated. The hospital personnel are responsible for preparing a receiving and treatment area, operating radiological detection equipment, and implementing proper emergency worker protective procedures.

All activities were evaluated in accordance with current FEMA directives and guidance and were performed in accordance with current hospital plans and procedures.

## **2.3 Scenario Summary**

The exercise scenario for this Medical Services Drill consisted of simulated notifications of escalating emergency classification levels at TMI from Site Area Emergency to General Emergency. Subsequent to being notified of the General Emergency, the Carlisle Regional Medical Center is notified that an incident had occurred resulting in the injury and possible radiological contamination of an emergency worker. The Hospital implemented its plan to prepare a Radiation Emergency Area to receive and treat the patient and activated its radiation emergency medical team.

The patient was injured in a fall that resulted in a fractured ankle and abrasions on the right elbow. Detectable radioactive contamination was found on the right outer pants.

## **SECTION 3: ANALYSIS OF CAPABILITIES**

### **3.1 Drill Evaluation and Results**

Contained in this section are the results and findings of the evaluations of all jurisdictions and locations that participated in the May 24, 2011, Medical Services (MS-1) Drill.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of the Exercise Evaluation Area Criteria contained in the REP Exercise Evaluation Methodology. Detailed information on the Exercise Evaluation Area Criteria and the Extent-of-Play Agreement used in this exercise are found in the Exercise Plan, Appendix C.

### **3.2 Summary Results of Drill Evaluation**

The 2011 TMI Medical Services Drill evaluation included two participating locations. Two evaluators provided analyses of three exercise criteria each. These analyses resulted in a determination that all criteria were successfully demonstrated and there were no Deficiencies, Areas Requiring Corrective Action or Planning Issues.



**Table 3.1 - Summary of Drill Evaluation**

DATE: 2011-05-24 SITE: Three Mile Island Nuclear Generating Station, PA M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		CuCo CrI/Hsp	CuCo WSEMS
Emergency Operations Management			
Mobilization	1a1		
Facilities	1b1		
Direction and Control	1c1		
Communications Equipment	1d1		
Equip & Supplies to support operations	1e1	M	M
Protective Action Decision Making			
Emergency Worker Exposure Control	2a1		
Radiological Assessment and PARs	2b1		
Decisions for the Plume Phase -PADs	2b2		
PADs for protection of special populations	2c1		
Rad Assessment and Decision making for the Ingestion Exposure Pathway	2d1		
Rad Assessment and Decision making concerning Relocation, Reentry, and Return	2e1		
Protective Action Implementation			
Implementation of emergency worker exposure control	3a1	M	M
Implementation of KI decision	3b1		
Implementation of protective actions for special populations - EOCs	3c1		
Implementation of protective actions for Schools	3c2		
Implementation of traffic and access control	3d1		
Impediments to evacuation are identified and resolved	3d2		
Implementation of ingestion pathway decisions - availability/use of info	3e1		
Materials for Ingestion Pathway PADs are available	3e2		
Implementation of relocation, re-entry, and return decisions.	3f1		
Field Measurement and Analysis			
Adequate Equipment for Plume Phase Field Measurements	4a1		
Field Teams obtain sufficient information	4a2		
Field Teams Manage Sample Collection Appropriately	4a3		
Post plume phase field measurements and sampling	4b1		
Laboratory operations	4c1		
Emergency Notification and Public Info			
Activation of the prompt alert and notification system	5a1		
Activation of the prompt alert and notification system - Fast Breaker	5a2		
Activation of prompt alert and notification system-Excpn Areas/Bkup RA	5a3		
Emergency information and instructions for the public and the media	5b1		
Support Operations/Facilities			
Mon/decon of evacuees and emergency workers, and registration of evacuees	6a1		
Mon/decon of emergency worker equipment	6b1		
Temporary care of evacuees	6c1		
Transportation and treatment of contaminated injured individuals	6d1	M	M

## **3.3 Criteria Evaluation Summaries**

### **3.3.1 Risk Jurisdictions**

#### **3.3.1.1 Cumberland County, Carlisle Hospital**

In summary, the status of DHS/FEMA criteria for this location is as follows:

- a. MET: 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

#### **3.3.1.2 Cumbeland County, West Shore Emergency Medical Service**

In summary, the status of DHS/FEMA criteria for this location is as follows:

- a. MET: 1.e.1, 3.a.1, 6.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: None
- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

## **SECTION 4: CONCLUSION**

Based on the review of the offsite radiological emergency response plans and procedures submitted, FEMA Region III has determined they are adequate and there is a reasonable assurance they can be implemented, as demonstrated during the TMI 2011 MS-1 Drill.

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## APPENDIX A: DRILL EVALUATORS AND TEAM LEADERS

DATE: 2011-05-24, SITE: Three Mile Island Nuclear Generating Station, PA

LOCATION	EVALUATOR	AGENCY
Cumberland County, Carlisle Hospital	*Joseph Suders	FEMA RIII
Cumbeland County, West Shore Emergency Medical Service	*Martin Vyenielo	FEMA - R3
* Team Leader		

## APPENDIX B: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAC	After Action Conference
AAR	After Action Report
ALARA	As Low As Reasonably Achievable
BRP	Bureau of Radiation Protection
CFR	Code of Federal Regulations
cpm	Counts Per Minute
DHS	Department of Homeland Security
DRD	Direct Reading Dosimeter
EOC	Emergency Operations Center
EPZ	Emergency Planning Zone
ExPlan	Exercise Plan
FEMA	Federal Emergency Management Agency
HSEEP	Homeland Security Exercise and Evaluation Program
KI	Potassium Iodide
MS-1	Medical Services
MSEL	Master Scenario Events List
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organization
PEMA	Pennsylvania Emergency Management Agency
REA	Radiation Emergency Area
REPP	Radiological Emergency Preparedness Program
TMI	Three Mile Island

Unclassified

Radiological Emergency Preparedness Program (REP)

After Action Report/Improvement Plan

Three Mile Island Nuclear Generating Station

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## **APPENDIX C: EXERCISE PLAN**

NATIONAL EXERCISE PROGRAM

# Exercise Plan

2011 THREE MILE ISLAND NUCLEAR GENERATING STATION  
FEMA EVALUATED MS-1 DRILL

U.S. DEPARTMENT OF HOMELAND SECURITY



## PREFACE

The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is sponsored by the Pennsylvania Emergency Management Agency (PEMA) and the Federal Emergency Management Agency (FEMA). This Exercise Plan (ExPlan) was produced with input, advice, and assistance from the Exercise Planning Team (EPT), which followed the guidance set forth in the Federal Emergency Management Agency, Homeland Security Exercise and Evaluation Program (HSEEP).

The ExPlan gives officials, observers, media personnel, and players from participating organizations the information necessary to observe or participate in a nuclear power plant accident response exercise focusing on participants' emergency response plans, policies, and procedures as they pertain to this type of event. The information in this document is current as of the date of publication and is subject to change as dictated by the EPT.

The 2011 Three Mile Island Nuclear Generating Station Plume MS-1 Drill is an *unclassified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the exclusive use of exercise Planners, Controllers, and Evaluators, but Players may view other materials deemed necessary to their performance. The ExPlan may be viewed by all exercise participants.

All exercise participants should use appropriate guidelines to ensure the proper control of information within their areas of expertise and to protect this material in accordance with current jurisdictional directives. Public release of exercise materials to third parties is at the discretion of DHS and the EPT.



## HANDLING INSTRUCTIONS

1. The title of this document is the *2011 Three Mile Island Nuclear Generating Station MS-1 Drill Exercise Plan (ExPlan)*.
2. The information gathered in this ExPlan is *For Official Use Only (FOUO)* and should be handled as sensitive information not to be disclosed. This document should be safeguarded, handled, transmitted, and stored in accordance with appropriate security directives. Reproduction of this document, in whole or in part, without prior approval from the Exercise Planning Director is prohibited.
3. At a minimum, the attached materials will be disseminated only on a need-to-know basis and when unattended, will be stored in a locked container or area offering sufficient protection against theft, compromise, inadvertent access, and unauthorized disclosure.
4. For more information, please consult the following points of contact (POCs):

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## CHAPTER 1: GENERAL INFORMATION

### Introduction

The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is a coordinated, supervised activity employed to test operations and functions of the participating entities (e.g., how the medical transport and hospital respond to conduct a decontamination drill) as they pertain to Nuclear Power Plant incident. An evaluated drill requires detailed planning. To conduct an effective drill, subject matter experts (SMEs) and local representatives from numerous agencies have taken part in the planning process and will take part in exercise conduct and evaluation.

This Exercise Plan (ExPlan) was produced at the direction of the Federal Emergency Management Agency and the Pennsylvania Emergency Management Agency with the input, advice, and assistance of the Exercise Planning Team. The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is evidence of the growing partnership between State and local jurisdictions for response to the threats our Nation and communities face.

### Confidentiality

The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is an *unclassified exercise*. The control of information is based more on public sensitivity regarding the nature of the exercise than on the actual exercise content. Some exercise material is intended for the exclusive use of exercise planners, controllers, and evaluators, but players may view other materials deemed necessary to their performance. This ExPlan may be viewed by all exercise participants, *but the Controller and Evaluator (C/E) Handbooks are restricted documents intended for controllers and evaluators only.*

All exercise participants should use appropriate guidelines to ensure the proper control of information within their areas of expertise and protect this material in accordance with current Federal Emergency Management Agency and the Pennsylvania Emergency Management Agency directives.

Public release of exercise materials to third parties is at the discretion of the Federal Emergency Management Agency (FEMA) and the Exercise Planning Team.

### Purpose

The purpose of this exercise is to evaluate player actions against current response plans and capabilities for a nuclear power plant-related incident, and to comply with the requirements of 44 CFR 350 and the guidelines of NUREG 0654/FEMA-REP-1. Exercise planners utilized the elements described in the 67 FR 20580 (April 25, 2002) and Interim Radiological Emergency Preparedness (REP) Program Manual (August 2002) to develop this exercise.

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The objective of the Federal Emergency Management Agency and the Pennsylvania Emergency Management Agency is to demonstrate reasonable assurance that the public can be protected during a nuclear power plant emergency.

## Target Capabilities

The establishment of the National Preparedness Priorities have steered the focus of homeland security toward a capabilities-based planning approach. Capabilities-based planning focuses on planning under uncertainty, since the next danger or disaster can never be forecast with complete accuracy. Therefore, capabilities-based planning takes an all-hazards approach to planning and preparation which builds capabilities that can be applied to a wide variety of incidents. States and Urban Areas use capabilities-based planning to identify a baseline assessment of their homeland security efforts by comparing their current capabilities against the Target Capabilities List (TCL) and the critical tasks of the Universal Task List (UTL). This approach identifies gaps in current capabilities and focuses efforts on identifying and developing priority capabilities and tasks for the jurisdiction. These priority capabilities are articulated in the jurisdiction's homeland security strategy and Multi-Year Training and Exercise Plan (TEP), of which this exercise is a component.

The capabilities listed below have been selected by the Exercise Planning Team (EPT) from the priority capabilities identified in Pennsylvania Multi-Year TEP and the FEMA Interim Radiological Emergency Preparedness Program Manual (August 2002), Exercise Evaluation Criteria. These capabilities provide the foundation for development of the exercise objectives and scenario, as the purpose of this exercise is to measure and validate performance of these capabilities and their associated critical tasks.

- Planning
- Communications
- Community Preparedness and Participation
- WMD/HazMat Response and Decontamination
- Emergency Triage and Pre-Hospital Treatment
- Medical Supplies Management and Distribution

## Exercise Objectives

The Emergency Preparedness Evaluation Areas – the elements and sub-elements – for this exercise are those that are required to be demonstrated in every MS-1 Drill, as required by 67 FR 20580 (April 25, 2002) and the *Interim REP Program Manual (August 2002)*. Appendix B Extent of Play shows the emergency preparedness elements that are required to be demonstrated in the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill, along with the level of demonstration that will be displayed in the exercise (i.e., fully demonstrated, limited demonstration, simulated, out-of-sequence interviews, not demonstrated).

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The objective of this exercise is to demonstrate reasonable assurance that the health and safety of the public can be protected, through successful demonstration of tasks identified in Appendix B.

### **Outstanding Issues**

There were no Areas Requiring Corrective Action (ARCAs) as a result of the previous FEMA-evaluated MS-1 Drill.

## CHAPTER 2: EXERCISE LOGISTICS

### Exercise Summary

#### General

The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is designed to establish a learning environment for players to demonstrate their knowledge and ability to implement plans and procedures for responding to an incident at a nuclear power plant. The 2011 Three Mile Island Nuclear Generating Station MS-1 Drill will be conducted on May 24, 2011.

Exercise play is scheduled to begin at 0800. The exercise may conclude when the Lead Controller in consultation with FEMA and Utility representatives determine that the exercise objectives have been met at each venue.

#### Assumptions

Assumptions constitute the implied factual foundation for the exercise and, hence, are assumed to be present before the start of the exercise. The following general assumptions apply to the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill:

- The exercise will be graded against the REPP criteria. Elements outside the scope of the REP criteria will not be graded.
- This exercise will be conducted in a no-fault learning environment wherein systems and processes, not individuals, will be evaluated.
- Exercise simulation will be realistic and plausible, containing sufficient detail from which to respond.
- Exercise players will react to the information and situations as they are presented, in the same manner as if this had been a real event.

#### Constructs and Constraints

Constructs are exercise devices designed to enhance or improve realism. Alternatively, constraints are exercise limitations that may detract from realism. Constraints may be the inadvertent result of a faulty construct or may pertain to financial and staffing issues. Although there are a number of constructs and constraints (also known as exercise artificialities) for any exercise, the EPT recognizes and accepts the following as necessary:

- Players will utilize normal, everyday communications methods, channels, and equipment.
- Out-of-Sequence play is allowed.

- Certain simulations are allowed.

The participating agencies may need to balance exercise play with real-world emergencies. It is understood that real-world emergencies will take priority.

### **Exercise Participants**

The following are the categories of participants involved in this exercise; note that the term “participant” refers to all categories listed below, not just those playing in the exercise:

- *Players.* Players are agency personnel who have an active role in responding to the simulated emergency and perform their regular roles and responsibilities during the exercise. Players initiate actions that will respond to and mitigate the simulated emergency.
- *Controllers.* Controllers set up and operate the exercise site; plan and manage exercise play; act in the roles of response individuals and agencies not playing in the exercise. Controllers direct the pace of exercise play and routinely include members from the exercise planning team. They provide key data to players and may prompt or initiate certain player actions to ensure exercise continuity.
- *Evaluators.* Evaluators are chosen to evaluate and provide feedback on a designated functional area of the exercise. They are chosen based on their expertise in the functional area(s) they have been assigned to review during the exercise and their familiarity with local emergency response procedures. Evaluators assess and document players’ performance against established emergency plans and exercise evaluation criteria, in accordance with HSEEP standards and within the bounds of REP Program guidance and regulations. They are typically chosen from amongst planning committee members or the agencies/organizations that are participating in the exercise. FEMA evaluators are members of the Region III REP Program staff, representatives of the Radiological Assistance Committee, and contractors. FEMA Evaluators will not serve as Controllers.
- *Actors.* Actors are exercise participants who act or simulate specific roles during exercise play. They are typically volunteers who have been recruited to play the role of victims or other bystanders.
- *Observers.* Observers visit or view selected segments of the exercise. Observers do not play in the exercise, and do not perform any control or evaluation functions. Observers will view the exercise from a designated observation area and will be asked to remain within the observation area during the exercise. PEMA observers will be present at selected locations as assigned by the Lead Controller. PEMA observers will receive an observer briefing prior to the day of the exercise. Any V.I.P.s or other visitors will be handled by each agency or location (Municipal EOC, County EOC, etc.) according to that agencies policies and procedures.



- *Support Staff.* Exercise support staff includes individuals who are assigned administrative and logistical support tasks during the exercise (i.e. registration, catering, etc).

## **Exercise Tools**

### **Controller and Evaluator Handbooks**

Due to the brevity of this exercise, the controller handbook is an integral part of the Extent of Play and is designed to help exercise Controllers conduct an effective exercise. The Handbook also enables Controllers and Evaluators to understand their roles and responsibilities in exercise execution and evaluation.

### **Master Scenario Events List**

The MSEL outlines benchmarks, as well as injects that drive exercise play. It also details realistic input to the exercise players as well as information expected to emanate from simulated organizations (i.e., those nonparticipating organizations, agencies, and individuals who would usually respond to the situation). An inject will include several items of information, such as inject time, intended recipient, responsible controller, inject type, a short description of the event, and the expected player action.

For the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill, the MSEL will be used primarily to initiate activities. Notifications will not go out from the utility in the same manner as they would in a real event. They will be initiated by the Lead Controller through the 911 Center. All communications will be preceded and terminated by the phrase "This is a Drill."

## **Exercise Implementation**

### **Exercise Play**

Exercise play will begin at approximately 0800, May 24, 2011, with a situation update going to each participating venue. Play will proceed according to the events outlined in the MSEL, in accordance with established plans and procedures. The exercise will conclude upon the completion of operations and attainment of the exercise objectives, as determined by the Lead Controller after consultation with FEMA and the Utility.

### **Exercise Rules**

The following are the general rules that govern exercise play:

- Real-world emergency actions take priority over exercise actions.
- Exercise participants will comply with real-world response procedures, unless otherwise directed by control staff.

- All communications (written, radio, telephone, etc.) made during the exercise will begin and end with the phrase, *"This is a drill."*

Exercise participants placing telephone calls or initiating radio communication must identify the organization, agency, office, and/or individual with whom they wish to speak.

## **Safety Requirements**

### **General**

Exercise participant safety takes priority over exercise events. Although the organizations involved in the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill come from various response agencies, they share the basic responsibility for ensuring a safe environment for all personnel involved in the exercise. In addition, aspects of an emergency response are dangerous. Professional health and safety ethics should guide all participants to operate in their assigned roles in the safest manner possible. The following general requirements apply to the exercise:

- An exercise Safety Controller will be identified and be responsible for participant safety.
- All exercise controllers, evaluators, and staff will serve as safety observers while the exercise activities are underway. Any safety concerns must be immediately reported to the Safety Controller.
- Participants will be responsible for their own and each other's safety during the exercise. It is the responsibility of all persons associated with the exercise to stop play if, in their opinion, a real safety problem exists. Once the problem is corrected, exercise play can be restarted.
- All organizations will comply with their respective environmental, health, and safety plans and procedures, as well as the appropriate Federal, State, and local environmental health and safety regulations.

### **Exercise Setup**

Exercise setup involves the pre-staging and dispersal of exercise materials; including registration materials, documentation, signage, and other equipment as appropriate.

### **Accident Reporting and Real Emergencies**

- Anyone observing a participant who is seriously ill or injured will provide aid within their training, call the County 911 Center for additional aid or enlist the aid of another person to call, and advise the nearest controller. Anyone calling County 911 will use the phrase "this is not a drill" prior to explaining the injury or illness.

- The controller who is made aware of a real emergency will contact the County 911 center (if this call has not already been made) and request the appropriate aid. The controller will use the phrase “this is not a drill” prior to explaining the injury or illness.
- The controller will then contact the Lead Controller/ Exercise Director with the following information:
  - Venue/function
  - Location within the venue/function
  - Condition of injured parties
  - Requirements for medical aid, fire suppression, rescue, or security resources.
- If the nature of the emergency requires a suspension of the exercise at the venue/function, all exercise activities at that facility will immediately cease. Exercise play may resume at that venue/function once the emergency situation has been addressed.
- Exercise play at other venue/functions should not cease if one venue/function has declared a “Real-World Emergency” unless they are reliant on the affected venue.
- If a real emergency occurs that affects the entire exercise, the exercise may be suspended or terminated at the discretion of the Exercise Director/Lead Controller. The notification will be made from the State Emergency Operations Center. The Lead Controller will notify the SimCell by phone.

## Site Access

### Security

Exercise play for the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill will be conducted at two sites with varying degrees of security requirements. Individual Site Controllers will be in charge of entry into their respective exercise sites. To prevent confusion and interruption of the exercise, access to the exercise sites will be limited to exercise participants and approved Observers only. Players should advise their venue’s controller or evaluator if an unauthorized person is present. Each organization should follow its internal security procedures, augmented as necessary to comply with exercise requirements.

### PEMA Observers and Liaison Officers

PEMA will assign Observers and Liaison Officers to each site that is being evaluated in the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill. The Lead Controller will provide a list of Observers and Liaison Officers to the appropriate Off-Site Response Organizations prior to the day of the exercise. All Observers and Liaison Officers will receive a pre-exercise briefing.

PEMA Observers are not intended to be players and should excuse themselves from any active participation in the exercise. If an Observer is engaged in any way by one of the exercise players he/she should refer the player to the PEMA Liaison Officer.

PEMA Liaison Officers are players and are assigned specific responsibilities for the exercise. Liaison Officers are instructed to inform the Lead Controller upon arrival at the exercise venue. Liaison Officers are allowed to interact in the exercise as a PEMA representative and are sometimes required to provide injects to facilitate exercise play.

### **Parking and Directions**

Directions to each venue area are available from the Lead Controller. Parking will be controlled according to existing policy at each individual location.

### **Restroom Facilities**

Restroom facilities will be available at each venue.

### **Exercise Identification**

Exercise participants will display their existing organizational identification badges.

### **Communications Plan**

#### **Exercise Start, Suspension, and Termination Instructions**

The exercise is scheduled to run for 4 hours or until the Lead Controller after consultation with FEMA and the Utility determine that the exercise objectives have been met. The exercise is scheduled to end by 1200. The Lead Controller will announce the exercise suspension or termination.

**All spoken and written communication will start and end with the statement, "THIS IS A DRILL."**

### **Player Communication**

Players will use routine, in-place agency communication systems. All exercise communication over primary dispatch channels will cease immediately if a real world emergency is announced. Communications concerning a real world emergency will be preceded by the phrase "This is not a drill". In no instance will exercise communication interfere with real-world emergency communications. Exercise communication over these channels will recommence when

authorized by the Exercise Director after he is advised by County 911 that it is safe to do so. Each venue will coordinate its own internal communication networks and channels.

The primary means of communication among Controllers and the venues will be telephone.

### **Player Briefing**

Controllers may be required to read specific scenario details to the participants to begin exercise play. They may also have technical handouts or other materials to give to players in order to better orient them to the exercise environment.

### **Public Affairs**

Any participation by the actual media will be coordinated through the Carlisle Regional Medical Center Public Information Office.

## CHAPTER 3: PLAYER GUIDELINES

### Exercise Staff

#### Exercise Director

The Exercise Director has the overall responsibility for planning, coordinating, and overseeing all exercise functions. The Exercise Director for the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is the Pennsylvania Emergency Management Agency Lead Controller.

#### Trusted Agents

Trusted agents are exercise planners and participants who are responsible for developing the Scenario and the Master Scenario Events List (MSEL). These documents are restricted and are not available to other members of the Exercise Planning Team, Players, or other Participants. The trusted agents for the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill include the Exercise Director/Lead Controller, Cumberland County Office of Emergency Preparedness representative, FEMA Emergency Management Program Specialist, and the Three Mile Island Nuclear Generating Station Emergency Planning representative.

#### Lead Controller

The Lead Controller also functions as a Trusted Agent. As such he is involved in developing the Master Scenario Events List and is privy to the scenario used at the Utility to generate exercise play. The Lead Controller is responsible for scheduling controllers at the "Out of Sequence" components of the exercise and the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill. The Lead Controller monitors exercise progress and coordinates decisions regarding deviations or significant changes to the scenario caused by unexpected developments during play. The Lead Controller monitors actions by individual Controllers and ensures they implement all designated and modified actions at the appropriate time. The Lead Controller will be the PEMA REP Training Program Manager and is stationed at the Carlisle Regional Medical Center Emergency Room during the Drill.

#### Controllers

At least one controller will be onsite with every facility participating in the exercise. The controller at each location will coordinate any changes that impact the scenario or affect other areas of play through the Lead Controller. The individual controllers issue exercise materials to players as required and monitor the exercise timeline. Controllers also provide injects to the players as described in the MSEL. The Trusted Agent from the Utility will act as the Controller

at the Utility Site during the Plume exercise and the BRP Trusted Agent will act as Controller for the BRP Field Teams.

### **Lead Evaluator**

The Lead Evaluator is responsible for the overall evaluation of the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill. The Lead Evaluator monitors exercise progress and stays in contact with the Lead Controller regarding changes to the exercise during play. The Lead Evaluator monitors actions of individual Evaluators and ensures they are tracking progress of the players in accordance with the Overview of Play. The Lead Evaluator debriefs the evaluators after the exercise and oversees the entire evaluation and After Action process. The Lead Evaluator will be the FEMA Region III REP Site Specialist.

### **Evaluators**

Evaluators work under the direction of the Lead Evaluator, and as a team with Controllers. Evaluators are Subject Matter Experts who record events that take place during the exercise and assess/submit documentation for review and inclusion in the After Action Report (AAR). Evaluators should refrain from any direct interaction with the players during exercise play except with the facilitation of a Controller for clarification of issues or during scheduled interviews.

## **Player Instructions**

### **Before the Exercise**

- Review the appropriate emergency plans, procedures, and exercise support documents.
- Arrive at the exercise location as instructed. Wear appropriate uniform/identification badge.
- If you gain knowledge of the scenario before the exercise, notify a controller so that appropriate actions can be taken to ensure a valid evaluation.
- Read your Player Information Handout, which includes information on exercise safety.
- Please sign in.
- Bureau of Radiation Protection Field Monitoring Teams will be briefed by the BRP Coordinator.

### **During the Exercise**

- Respond to the exercise events and information as if the emergency were real, unless otherwise directed by an exercise controller.

- Controllers will only give you information they are specifically directed to disseminate. You are expected to obtain other necessary information through existing emergency information channels.
- Do not engage in personal conversations with controllers, evaluators, observers, or media personnel while the exercise is in progress. If you are asked an exercise-related question, give a short, concise answer. If you are busy and cannot immediately respond, indicate so, but report back with an answer at the earliest time possible.
- If you do not understand the scope of the exercise or if you are uncertain about an organization's or agency's participation in an exercise, ask a controller.
- Parts of the scenario may seem implausible. Recognize that the exercise has objectives to satisfy and may require the incorporation of unrealistic aspects. Note that every effort has been made by the trusted agents to balance realism with safety and the creation of an effective learning and evaluation environment.
- All exercise communication will begin and end with the phrase "This is a drill". This is a precaution taken so anyone overhearing the conversation will not mistake the exercise play for a real-world emergency.
- When communicating with the SimCell, identify the organization, agency, office, and/or individual with which you want to speak.
- Verbalize out loud when taking an action. This will ensure that evaluators are made aware of critical actions as they occur.
- Maintain a log of your activities. Many times, this log may include documentation of activities missed by a controller or evaluator.

### **Following the Exercise**

- At the end of the exercise at your facility, participate in a debriefing with the controllers and evaluators.
- Provide all rosters, sign in sheets, logs, messages, notes or materials generated from the exercise to your controller or evaluator for review and inclusion in the AAR.

### **Simulation Guidelines**

Because the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is of limited duration and scope, the physical description of what would fully occur at the incident sites and surrounding areas will be relayed to the Players by Simulators or Controllers.

If a real emergency occurs during the exercise, the exercise at your respective venue may be suspended or terminated at the discretion of the controller(s) at each venue. If a real emergency



occurs, provide assistance up to the level of your training, call 911 and use the phrase “This is not a drill” and ask for the appropriate assistance, and notify the nearest Controller and Evaluator.

## **CHAPTER 4: EVALUATION AND POST-EXERCISE ACTIVITIES**

### **Exercise Documentation**

The goal of the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is to comprehensively exercise and evaluate the OROs' plans and capabilities as they pertain to a potential nuclear power plant incident. After the exercise, data collected by Controllers, Evaluators, and Players will be used to identify strengths and areas for improvement in the context of the exercise design objectives.

### **Exercise Evaluation Guides**

DHS has developed Exercise Evaluation Guides (EEGs) that identify expected activities for evaluation, provide consistency across exercises, and link individual tasks to disciplines and expected outcomes.

The EEGs selected by the Exercise Planning Team are contained in the evaluator materials packet along with the Evaluator Handbook. These EEGs have been selected because the activities they describe can be expected to be observed during the exercise and will guide evaluation to match the exercise design objectives. Supplemental REP evaluation material designed for the exercise may also be used.

### **DEBRIEFING**

Immediately following the completion of exercise play, Controllers will facilitate a debriefing with Players from their assigned location. The debriefing is an opportunity for Players to voice their opinions on the exercise and their own performance. At this time, Evaluators can also seek clarification on certain actions and what prompted Players to take them. The debriefing should not last more than 30 minutes. Evaluators should take notes during the debriefing and include these observations in their analysis.

### **Exercise Evaluation Hotwash**

Controllers, Evaluators, and selected exercise participants will attend a facilitated Controller / Evaluator/Player Hotwash on May 24 at 1200 at the Carlisle Regional Medical Center. During the Hotwash these individuals will discuss their observations of the exercise in an open environment to clarify actions taken during the exercise.

## **Participants and Public/Media Briefings**

Participants and Public/Media Briefings are not routinely facilitated subsequent to MS-1 Drills. Questions about drill activities and results will be referred to the PEMA PIO and FEMA External Affairs Office.

## **After Action Report**

The AAR is the culmination of the exercise. It is a written report outlining the strengths and areas for improvement identified during the exercise. The AAR will include the timeline, executive summary, scenario description, mission outcomes, and capability analysis. The AAR will be drafted by the lead Federal Evaluator.

## **After Action Conference and Improvement Plan**

The improvement process represents the comprehensive, continuing preparedness effort of which the 2011 Three Mile Island Nuclear Generating Station MS-1 Drill is a part. The lessons learned and recommendations from the AAR will be incorporated into the Improvement Plan (IP), if required.

### **After Action Conference**

The After Action Conference (AAC) was not applicable to this exercise as there were no identified issues.

### **Improvement Plan**

The IP identifies how recommendations will be addressed, including what actions will be taken, who is responsible, and the timeline for completion. An IP was not applicable to this exercise as there were no identified issues.

## APPENDIX A: EXERCISE SCHEDULE

Table A.1 MS-1 Drill Schedule

Time (Tentative)	Personnel	Activity
<b>May 24, 2011</b>		
0700	Exercise Staff Assembly	Exercise Briefing
0730	Hospital Maintenance Staff	Setup REA
0800	Exercise Participants	Begin Exercise
1130	Exercise Staff Assembly	Exercise Debriefing/Hotwash

**APPENDIX B: EXTENT OF PLAY INFORMATION**  
**THREE MILE ISLAND NUCLEAR GENERATING STATION**  
**CARLISLE REGIONAL MEDICAL CENTER MEDICAL SERVICES**  
**DRILL**  
**May 24, 2011**

**Method of Operation**

1. Three Mile Island Nuclear Generating Station (TMI):  
The power station and its personnel will not play an active role in the facilitation of this drill. The plant's simulated events, radiation releases, and emergency classifications will be injected by off-site controllers. A preapproved scenario will be used.
2. Bureau of Radiation Protection (BRP):  
The Bureau of Radiation Protection will not participate in this drill.
3. Pennsylvania Emergency Management Agency (PEMA) Emergency Operations Center (EOC):  
PEMA EOC will not participate in this drill.
4. Counties Designated to Participate:  
Columbia County will provide pre-drill coordination and observe drill activities.
5. Controllers:  
Controllers will be supplied by PEMA. Controllers are not players and will provide injects and information to initiate and stimulate drill play by providing radiological readings during the monitoring of personnel. Live radioactive sources will only be used to perform operational checks of radiological monitoring instruments.
6. PEMA Observers:  
PEMA staff and qualified county emergency management personnel will be assigned to key locations for the purpose of observing, noting response actions and conditions, and recording observations for future use. Observers will not take an active part in the proceedings, but will interact with staff members to the extent necessary to fulfill their observer responsibilities. Coaching of players is not permitted, except as appropriate to provide training to participants awaiting a re-demonstration.
7. Department of Homeland Security (DHS), Federal Emergency Management Agency

(FEMA), Radiological Emergency Preparedness Program (REPP) Evaluators:  
FEMA Evaluators will be present at designated demonstration locations.

8. **Drill Activities Schedule:**  
Drill activities are scheduled to commence on or about 0800, May 24, 2011, and continue until the participants have completed the drill objectives and demonstrated the Exercise Evaluation Criteria.
  
9. **Stand Down:**  
Participants and agencies will Stand Down when the Controllers have confirmed with the evaluators that all evaluation criteria have been demonstrated and when the State and County Observers are satisfied that the Objectives have been met.
  
10. **General concepts**  
An emergency plan is drafted to address the generally expected conditions of an emergency. Not everything in the emergency plan may be applicable for a given scenario. The main purpose of an emergency plan is to assemble sufficient expertise and officials so as to properly react to the events as they occur. The responders should not be so tied to a plan that they cannot take actions that are more protective of the public. Therefore, if, by not following the plan, the responders protect the public equally as well as provided in the plan, it should be noted for possible modification of the plan, but not classified as a negative incident. Furthermore, if, by following the plan there is a failure to protect the public health and safety, it should be noted so that the plan can be modified and the appropriate negative assessment corrected.
  
11. **Re-demonstration**  
During the drill any activity that is not satisfactorily demonstrated may be re-demonstrated by the participants during the exercise, provided it does not negatively interfere with the exercise. Refresher training may be provided by the players, observers, and/or controllers. Evaluators are not permitted to provide refresher training. Re-demonstrations will be negotiated between the players, observers, controllers, and evaluators. PEMA may advise the RAC Chair prior to initiating any re-demonstrations. It is permissible to extend the demonstration window, within reason, to accommodate the re-demonstration. Activities corrected from a re-demonstration will be so noted.

**THREE MILE ISLAND NUCLEAR GENERATING STATION**  
**CARLISLE REGIONAL MEDICAL CENTER MEDICAL SERVICES**  
**DRILL**  
**May 24, 2011**

**Extent of Play Agreement**

**Evaluation Area 1**

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

**INTENT**

This sub-element derives from NUREG-0654, which provides that Offsite Response Organizations (ORO) have emergency equipment and supplies adequate to support the emergency response.

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

**EXTENT OF PLAY**

Equipment within the facility (facilities) should be sufficient and consistent with the role assigned to that facility in the ORO's plans and/or procedures in support of emergency operations. Use of maps and displays is encouraged.

All instruments, including air sampling flow meters (field teams only), should be inspected, inventoried, and operationally checked before each use. Instruments should be calibrated in accordance with the manufacturer's recommendations. Unmodified CDV-700 series instruments and other instruments without a manufacturer's recommendation should be calibrated annually. Modified CDV-700 instruments should be calibrated in accordance with the recommendation of the modification manufacturer. A label indicating such calibration should be on each instrument, or the calibration frequency may be verified by other means. Additionally, instruments being

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**Appendix B: Extent of Play Information**

used to measure activity should have a range of reading sticker affixed to the side of the instrument. The above considerations should be included in 4.a.1 for field team equipment; 4.c.1 for radiological laboratory equipment (does not apply to analytical equipment; reception center and emergency worker facilities' equipment under 6.a.1; and ambulance and medical facilities' equipment under 6.d.1.

Sufficient quantities of appropriate direct-reading and permanent record dosimeters and dosimeter chargers should be available for issuance to all categories of emergency workers that could be deployed from that facility. Appropriate direct-reading dosimetry should allow individual(s) to read the administrative reporting limits and maximum exposure limits contained in the ORO's plans and procedures.

Dosimetry (*Direct Reading Dosimeters*) should be inspected for electrical leakage at least annually and replaced, if necessary. CDV-138s, due to their documented history of electrical leakage problems, should be inspected for electrical leakage at least quarterly and replaced if necessary. This leakage testing will be verified during the exercise, through documentation submitted in the Annual Letter of Certification, and/or through a staff assistance visit.

Responsible OROs should demonstrate the capability to maintain and distribute inventories of KI sufficient for use by emergency workers, as indicated on rosters; institutionalized individuals, as indicated in capacity lists for facilities; and, where stipulated by the plan and/or procedures, members of the general public (including transients) within the plume pathway EPZ.

Quantities of dosimetry and KI available and storage locations(s) will be confirmed by physical inspection at storage location(s) or through documentation of current inventory submitted during the exercise, provided in the Annual Letter of Certification submission, and/or verified during a Staff Assistance Visit. Available supplies of KI should be within the expiration date indicated on KI bottles or blister packs. As an alternative, the ORO may produce a letter from a certified private or State laboratory indicating that the KI supply remains potent, in accordance with U.S. Pharmacopoeia standards.

At locations where traffic and access control personnel are deployed, appropriate equipment (for example, vehicles, barriers, traffic cones and signs, etc.) should be available or their availability described.

**All activities must be based on the ORO's plans and procedures and completed, as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.**

***PEMA Negotiated Extent of Play:***

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## **Appendix B: Extent of Play Information**

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*Ambulance crews are not trained or equipped to operate or carry radiological monitoring equipment. In accordance with PEMA/BRP standard operating procedures ambulance crews operating outside the 10 mile Emergency Planning Zone are considered 'Category C' emergency workers; therefore, they are only required to implement protective measures consistent with protection against blood-borne pathogens; i.e., long sleeved garments, trousers, impermeable gloves, and surgical masks. "Category C" emergency worker dosimetry issue consists of one permanent reading dosimeter per worker.*

*Hospital personnel are also considered "Category C" emergency workers and will conform to PEMA/BRP SOP protective measures at minimum. Direct Reading Dosimeters may be issued individually; however, an Area Kit will be established in the Radiation Emergency Area (REA). Individual PRDs will be issued by the hospital.*

*Radiological Survey Instruments are calibrated per manufactures recommendations.*

### **Evaluation Area 3**

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

#### **INTENT**

This sub-element derives from NUREG-0654, which provides that OROs should have the capability to provide for the following: distribution, use, collection, and processing of direct-reading dosimetry and permanent record dosimetry; the reading of direct-reading dosimetry by emergency workers at appropriate frequencies; maintaining a radiation dose record for each emergency worker; and establishing a decision chain or authorization procedure for emergency workers to incur radiation exposures in excess of protective action guides, always applying the ALARA (As Low As is Reasonably Achievable) principle as appropriate.

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

#### **EXTENT OF PLAY**

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#### **Appendix B: Extent of Play Information**

FOR OFFICIAL USE ONLY

ORO's should demonstrate the capability to provide appropriate direct-reading and permanent record dosimetry, dosimeter chargers, and instructions on the use of dosimetry to emergency workers. For evaluation purposes, appropriate direct-reading dosimetry is defined as dosimetry that allows individual(s) to read the administrative reporting limits (that are pre-established at a level low enough to consider subsequent calculation of Total Effective Dose Equivalent) and maximum exposure limits (for those emergency workers involved in life saving activities) contained in the ORO's plans and procedures.

Each emergency worker should have the basic knowledge of radiation exposure limits as specified in the ORO's plan and/or procedures. Procedures to monitor and record dosimeter readings and to manage radiological exposure control should be demonstrated.

During a plume phase exercise, emergency workers should demonstrate the procedures to be followed when administrative exposure limits and turn-back values are reached. The emergency worker should report accumulated exposures during the exercise as indicated in the plans and procedures. ORO's should demonstrate the actions described in the plan and/or procedures by determining whether to replace the worker, to authorize the worker to incur additional exposures or to take other actions. If scenario events do not require emergency workers to seek authorizations for additional exposure, evaluators should interview at least two emergency workers, to determine their knowledge of whom to contact in the event authorization is needed and at what exposure levels. Emergency workers may use any available resources (for example, written procedures and/or co-workers) in providing responses.

Although it is desirable for all emergency workers to each have a direct-reading dosimeter, there may be situations where team members will be in close proximity to each other during the entire mission and adequate control of exposure can be affected for all members of the team by one dosimeter worn by the team leader. Emergency workers who are assigned to low exposure rate areas, for example, at reception centers, counting laboratories, emergency operations centers, and communications centers, may have individual direct-reading dosimeters or they may be monitored by dosimeters strategically placed in the work area. It should be noted that, even in these situations, each team member must still have their own permanent record dosimetry.

Individuals without specific radiological response missions, such as farmers for animal care, essential utility service personnel, or other members of the public who must re-enter an evacuated area following or during the plume passage, should be limited to the lowest radiological exposure commensurate with completing their missions.

**All activities must be based on the ORO's plans and procedures and completed, as they would be in an actual emergency, unless noted above or otherwise indicated in the extent of play agreement.**

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## Appendix B: Extent of Play Information

***PEMA Negotiated Extent of Play:***

*Radiological briefings will be provided to address exposure limits and procedures to replace personnel approaching limits and how permission to exceed limits is obtained.*

*At any time, players may ask other players or supervisors to clarify radiological information.*

*In Pennsylvania, emergency workers outside the EPZ do not have turn-back values.*

*Standard issue of dosimetry and potassium iodide for each category of emergency worker is as follows:*

*Category A: 1 PRD, 1 DRD, and 1 unit of KI*

*Category B: 1 PRD and 1 unit of KI*

*Category C: 1 PRD*

*All locations that have dosimetry equipment indicated within their Radiological Emergency Response Plan (RERP) will make the dosimetry equipment (and KI, as appropriate) available for inspection by the Federal Evaluator. In order to demonstrate an understanding of the use of the dosimetry equipment, KI and associated forms; the location need only remove and distribute / issue a maximum of six (6) units of dosimetry from their inventory. Simulation PRDs with mock serial numbers may be used.*

**Evaluation Area 6**

*Sub-element 6.d.1 – Transportation and Treatment of Contaminated Injured Individuals*

**INTENT**

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (ORO) provide that arrangements are made for medical services for contaminated injured individuals.

**Criterion 6.d.1: The facility/ORO has the appropriate space adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.**

**EXTENT OF PLAY**

Monitoring, decontamination, and contamination control efforts should not delay urgent medical

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**Appendix B: Extent of Play Information**

care for the victim.

OROs should demonstrate the capability to transport contaminated injured individuals to medical facilities. An ambulance should be used for response to the victim. However, to avoid taking an ambulance out of service for an extended time, OROs may use any vehicle (e.g., car, truck, or van) to transport the victim to the medical facility. Normal communications between the ambulance/dispatcher and the receiving medical facility should be demonstrated. If a substitute vehicle is used for transport to the medical facility, this communication should occur before releasing the ambulance from the drill. This communication would include reporting radiation monitoring results, if available. In addition, the ambulance crew should demonstrate, by interview, knowledge of where the ambulance and crew would be monitored and decontaminated, if required, or whom to contact for such information.

Monitoring of the victim may be performed before transport or en route, or may be deferred to the medical facility. Before using a monitoring instrument(s), the monitor(s) should demonstrate the process of checking the instrument(s) for proper operation. All monitoring activities should be completed as they would be in an actual emergency. Appropriate contamination control measures should be demonstrated before and during transport and at the receiving medical facility.

The medical facility should demonstrate the capability to activate and set up a radiological emergency area for treatment. Equipment and supplies should be available for treatment of contaminated injured individuals.

The medical facility should demonstrate the capability to make decisions on the need for decontamination of the individual, follow appropriate decontamination procedures, and maintain records of all survey measurements and samples taken. All procedures for collection and analysis of samples and decontamination of the individual should be demonstrated or described to the evaluator. Waste water from decontamination operations does not need to be collected.

**All activities associated with this criterion should be based on the ORO's plans and/or procedures and completed as they would be in an actual emergency, unless noted above or otherwise indicated in the extent-of-play agreement.**

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## Appendix B: Extent of Play Information

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# **CARLISLE REGIONAL MEDICAL CENTER MEDICAL SERVICES DRILL MAY 24, 2011**

## **EXERCISE SUMMARY**

The purpose of this drill is to demonstrate the capabilities of the emergency response organizations in Cumberland County in handling contaminated/injured persons and to satisfy both the hospital's requirement for an emergency/drill and the "Medical Services Guidance Memorandum MS-1."

## **PARTICIPANTS**

Carlisle Regional Medical Center  
Cumberland County Office of Emergency Preparedness  
West Shore EMS

## **CONTROLLERS**

Pennsylvania Emergency Management Agency  
Exelon Nuclear Corp.

## **EVALUATORS**

Federal Emergency Management Agency

## **OBSERVERS**

Cumberland County Office of Emergency Preparedness  
Pennsylvania Emergency Management Agency  
Exelon Nuclear Corp.

## **SCHEDULE OF EVENTS**

### **Carlisle Regional Medical Center**

- 8:30 a.m. Exercise begins.
- 8:30 a.m. Hospital is notified that the emergency at the Three Mile Island Nuclear Generating Station (TMI) has escalated to a Site Area Emergency.
- 8:40 a.m. The hospital is notified that the emergency at TMI has escalated to a General Emergency.
- 8:50 a.m. Hospital is notified that there is a victim injured and potentially contaminated.
- 9:10 a.m. The victim arrives at the hospital by ambulance.
- 10:45 a.m. Exercise ends.

### **West Shore EMS**

- 8:30 a.m. Exercise begins.
- 8:30 a.m. Ambulance company is notified that the emergency at the Three Mile Island Nuclear Generating Station (TMI) has escalated to a Site Area Emergency.
- 8:40 a.m. Ambulance company is notified that the emergency at TMI has escalated to a General Emergency.
- 8:45 a.m. An ambulance is requested to report to the accident site to pick up an injured and potentially contaminated individual. (Simulated - Staging will be at the Cumberland County Emergency Operations Center.)
- 9:05 a.m. Ambulance leaves for hospital.
- 9:10 a.m. Ambulance arrives at the hospital.
- 9:15 a.m. Exercise ends for ambulance crew.
- 10:45 a.m. Critique at hospital immediately following the drill.

**NOTE: Ambulance company will respond without siren and lights.**

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## **SCENARIO**

- 8:30 a.m. Ambulance and the hospital are notified that an emergency at TMI has escalated to a Site Area Emergency.
- 8:40 a.m. Ambulance company and hospital are notified that the TMI emergency has escalated to a General Emergency.
- 8:45 a.m. Ambulance is requested to report to the accident scene (Simulated at the Cumberland County Emergency Operations Center) to pick up an injured and potentially contaminated victim.
- 8:50 a.m. The hospital is notified that an injured potentially contaminated victim will be brought in for treatment.
- 9:05 a.m. The ambulance leaves for the hospital.
- 9:10 a.m. The ambulance arrives at the hospital.
- 9:15 a.m. Hospital staff takes control of the contaminated/injured person. Ambulance and crew are monitored before being released.
- 10:30 a.m. After the patient is stabilized and decontaminated, cleanup of the area begins. (Explained)
- 10:45 a.m. Exercise ends. Critique begins.

## **OBJECTIVES**

### **Carlisle Regional Medical Center**

1. Demonstrate that the facility has the appropriate space, adequate resources and trained personnel to provide monitoring, decontamination and medical services to contaminated/injured individuals. (6.2.1)
2. Demonstrate appropriate procedures and equipment to manage radiological exposure to staff. (3.a.1)
3. Return the Emergency Room to pre-emergency conditions. (Explained)

### **West Shore EMS**

1. Demonstrate the ability to assess, prepare, and transport contaminated/injured individuals while using ALARA principles. (6.d.1)

#### **NOTES:**

- Monitoring of ambulance and crew is the responsibility of the Carlisle Regional Medical Center staff.



### **CONTROLLER PROMPTS**

- 8:30 a.m. County Controller notifies the ambulance company and hospital that an emergency at TMI has escalated to a **Site Area Emergency**.
- 8:40 a.m. County Controller notifies the ambulance company and hospital that the TMI emergency has escalated to a **General Emergency**.
- 8:45 a.m. County Controller request that the **ambulance report to the accident scene** (Simulated at the Cumberland County Emergency Operations Center) to pick up an injured and potentially contaminated victim.
- 8:50 a.m. **The ambulance company notifies the hospital** that an injured potentially contaminated victim will be brought in for treatment.

**NOTE:** During monitoring of the victim the PEMA controller will inform the monitor of the contamination levels as indicated by the attachment.  
The controller should precede and conclude all transmissions with  
**"THIS IS A DRILL."**

### **CONTROLLER ASSIGNMENTS**

Communications	Cumberland County
All others	PEMA

**NOTE: Please begin and end all telephone conversations with  
"THIS IS A DRILL."**

## **ATTACHMENT 1**

### **INJURED PERSON**

**Situation:** An emergency worker fell from an emergency vehicle in a decontamination area during an incident at Three Mile Island Nuclear Generating Station (simulated).

**Injuries:** Victim has abrasions on both knees and a possible fracture on the right elbow.

**Contamination:** Initial readings at the hospital are indicated in counts per minute (cpm) below:

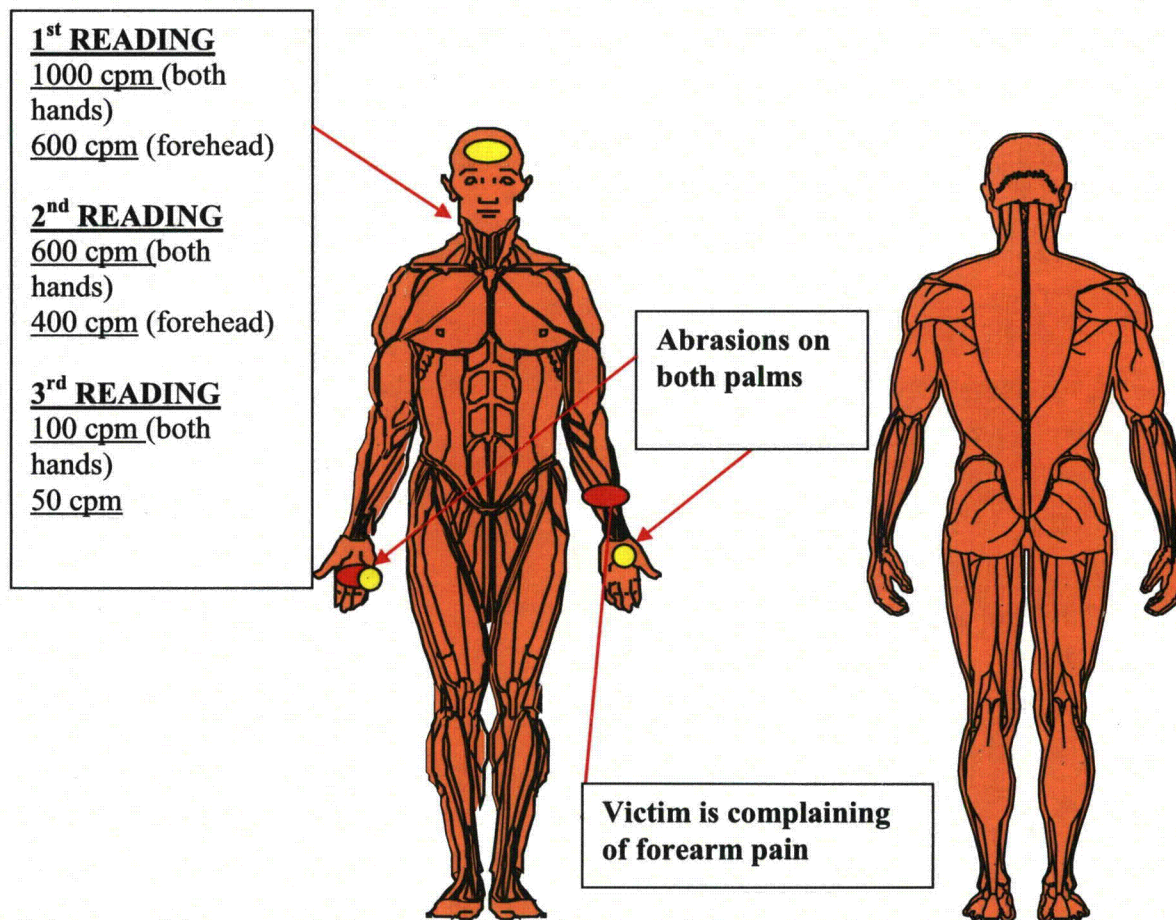
- 1) **Left and right palm (1200 cpm) Initial**
- 2) **Forehead area (600 cpm) Initial**

**Blood Pressure:** 120/80  
**Pulse:** 90  
**Breathing:** 22  
**Temperature:** Normal  
**Nausea:** No  
**Vision:** Clear, eyes equal and reactive  
**Patient has a persistent cough**  
**No Allergies.**  
**Patient may give own responses to all other queries**

## ATTACHMENT 2

### BODY MAP

INDICATES AREAS OF CONTAMINATION/INJURY



- A) Abrasions on both palms. Victim is complaining of forearm pain.
- B) Initial contamination is indicated in yellow below.

**Gross decontamination should be accomplished at the scene. Readings will become lower after successful decontamination demonstrations. Evaluator may ask questions as the exercise progresses.**

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**THIS IS A DRILL**

**CONTROLLER/EVALUATOR NOTES**

<b>TOPIC</b>	<b>West Shore EMS</b>	<b>Carlisle Regional Medical</b>
<b>Communications</b>		
<b>Contamination Control</b>		
<b>Clean Transfer</b>		
<b>Equipment</b>		
<b>Monitoring Procedures</b>		
<b>Decontamination</b>		
<b>Personal Protective Clothing</b>		
<b>Dosimetry</b>		
<b>Patient Care</b>		

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**Unclassified**  
**Radiological Emergency Preparedness Program (REP)**

After Action Report/Improvement Plan

Three Mile Island Nuclear Generating Station

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<b>Response time</b>		
<b>Radiation Emergency Area (REA)Set-Up or Hot Zone Control</b>		
<b>Disrobing Procedures</b>		
<b>Security</b>		
<b>Glove changes</b>		

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## **APPENDIX D: IMPROVEMENT PLAN**

Because there were no “Deficiencies, Areas Requiring Corrective Action, or Planning Issues,” an Improvement Plan is not applicable to this report.

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