U.S. Department of Homeland Security Region IX 1111 Broadway, Suite 1200 Oakland, CA 94607-4052



# FEB 07 2012

Mr. Mark Ghilarducci Secretary California Emergency Management Agency 3650 Schriever Avenue Mather, CA 95655

Dear Mr. Ghilarducci:

I am forwarding a copy of the Final After Action Report for the medical services drill held in San Luis Obispo County on August 10, 2011, for the Diablo Canyon Power Plant (DCPP). The purpose of this exercise was to assess the level of state and local preparedness in responding to a radiological emergency. The final exercise report was prepared by the U.S. Department of Homeland Security's Federal Emergency Management Agency, Region IX Radiological Emergency Preparedness Program staff.

No deficiencies were identified during this exercise for the state of California or San Luis Obispo County. There were no Areas Requiring Corrective Action (ARCA) identified as a result of the exercise.

Based on the evaluation of the August 10, 2011, medical services drill, the offsite radiological emergency response plans for the state of California and the affected local jurisdictions site-specific to DCPP can be implemented, and are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public in the event of a radiological emergency at DCPP.

Therefore, the Code of Federal Regulations, Title 44 Part 350 interim approval of the offsite radiological emergency response plans and preparedness for the state of California, site-specific to DCPP, will remain in effect.

I would also like to take this opportunity to acknowledge the many individuals that participated in this successful exercise. Their dedication to this program was clearly evident.

Mr. Mark Ghilarducci Page 2

If you have any questions or need additional information, please contact me at (510) 627-7100. Your staff may also contact Ms. Katherine Nishihara, DCPP Site-Specialist, at 510-627-7080, or Mr. James Macaulay, Acting Radiological Assistance Committee Chair, at 510-627-7009.

Sincerely,

Nancy Ward

Nancy Ward Regional Administrator FEMA Region IX

Enclosure

U.S. Department of Homeland Security Region IX 1111 Broadway, Suite 1200 Oakland, CA 94607-4052



# FEB 07 2012

Mr. Elmo E. Collins, Jr. Regional Administrator U.S. Nuclear Regulatory Commission Region IV 611 Ryan Plaza, Suite 400 Arlington, Texas 76011-8064

Dear Mr. Collins:

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Mr. Elmo E. Collins, Jr. Page 2

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Sincerely,

Nancy Ward

Nancy Ward Regional Administrator FEMA Region IX

Enclosure

cc: NRC Headquarters Document Control Desk US Nuclear Regulatory Commission Washington, DC 20555-0001

Vanessa Quinn, Chief Radiological Emergency Preparedness Branch FEMA Headquarters



# Diablo Canyon Power Plant

# **After Action Report/Improvement Plan**

# Drill Date – August 10, 2011

Radiological Emergency Preparedness (REP) Program



Final Published December 22, 2011

Final After Action Report/Improvement Plan

Diablo Canyon Power Plant

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# Diablo Canyon Power Plant

# After Action Report/Improvement Plan

# Published December 22, 2011

SEC	TION 1.	Drill Overview	6	
1.1	Drill Details.		6	
1.2	Drill Planning Team Leadership6			
1.3	Participating	Organizations	7	
SEC	TION 2.	Drill Design Summary	8	
2.1	Drill Purpose	e and Design	8	
2.2	Drill Objectiv	ves, Capabilities and Activities	8	
2.3	Scenario Sun	nmary	8	
SEC	TION 3.	Analysis of Capabilities	9	
3.1	Drill Evaluat	ion and Results	9	
3.2	3.2 Summary Results of Drill Evaluation			
3.3	Criteria Eval	uation Summaries	12	
3.3	1 Risk Jur	risdictions	12	
3.3	2 Private .	Jurisdictions	12	
SEC	TION 4.	Conclusion	13	
Appendix A: Drill evaluators				
Appendix B: Acronyms and Abbreviations15				
Appen	Appendix C: Extent-of-Play			

Final After Action Report/Improvement Plan

Diablo Canyon Power Plant

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Final After Action Report/Improvement Plan

# **EXECUTIVE SUMMARY**

The U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA) Region IX National Preparedness Division - Technological Hazards Branch evaluated a medical services drill in the emergency planning zone (EPZ) around the Diablo Canyon Power Plant (DCPP) on August 10, 2011.

The most recent biennial plume phase drill at this site was conducted on August 11, 2010. The last medical services drill held at the French Hospital Medical Center was conducted on October 17, 2007.

The purpose of the drill was to assess the level of state and local preparedness in response to a simulated radiological emergency at DCPP. This drill was held in accordance with FEMA's policies and guidance concerning the drill of state and local Radiological Emergency Response Plans (RERP) and procedures.

FEMA wishes to acknowledge the efforts of the many individuals who participated in this drill.

Protecting the public health and safety is the full-time job of some of the drill participants and 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.

This report contains the final evaluation of the drill. The drill participants, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures and adequately demonstrated the ability to execute those plans. There were no Deficiencies and no Areas Requiring Corrective Action (ARCA) identified during the course of the drill.

# **SECTION 1. DRILL OVERVIEW**

# **1.1 Drill Details**

## **Drill Name**

Diablo Canyon Power Plant Medical Services Drill

## **Type of Drill**

Medical Services Drill

## **Drill Date**

August 10, 2011

## Program

Department of Homeland Security/FEMA Radiological Emergency Preparedness Program

## Scenario Type

Radiological Emergency

# 1.2 Drill Planning Team Leadership

Kelly Van Buren Emergency Services Coordinator San Luis Obispo County Office of Emergency Services San Luis Obispo, CA 93408

Tracey Vardas Emergency Planning Coordinator PG&E Diablo Canyon Power Plant Avila Beach, CA 93424

Richard Echavarria Senior Site Specialist Radiological Emergency Preparedness Program FEMA Region IX Oakland, CA 94607

# **1.3 Participating Organizations**

The following agencies and organizations participated in the Diablo Canyon Power Plant drill:

## County

San Luis Obispo County

## **Private Sector Organizations**

San Luis Ambulance French Hospital Medical Center Diablo Canyon Power Plant

# **SECTION 2. DRILL DESIGN SUMMARY**

# 2.1 Drill Purpose and Design

FEMA Region IX evaluated the drill to assess the capabilities of local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving DCPP. The purpose of this final After Action Report (AAR) is to present the results and findings on the performance of the Offsite Response Organizations (ORO) during a simulated radiological emergency.

# 2.2 Drill Objectives, Capabilities and Activities

The drill evaluation area criteria, contained in the FEMA Federal Register Notice, "Radiological Emergency Preparedness Drill Evaluation Methodology," dated April 25, 2002 represent a functional translation of the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Rev.1, "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980.

The objectives of this drill are as follows:

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)

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)

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

# 2.3 Scenario Summary

This section contains a summary of the simulated sequence of events used as the basis for invoking emergency response actions by OROs, submitted to FEMA by the state of California and DCPP.

A maintenance worker was performing work on an Emergency Core Cooling System valve inside the Unit 1 containment when the packing gland failed. The worker was sprayed in the face with warm, low pressure water from the system. The worker was struck in the face with a tool she was carrying which resulted in a facial laceration and contusions. She fell to the ground and injured her wrist and received a cut to her palm. The injured person was assisted by coworkers to the Unit 1 140ft. Access Area.

Final After Action Report/Improvement Plan

# **SECTION 3. ANALYSIS OF CAPABILITIES**

# 3.1 Drill Evaluation and Results

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the August 10, 2011, medical services drill to test the offsite emergency response capabilities of state and local government agencies for the DCPP EPZ.

Each jurisdiction and functional entity was evaluated on its demonstration of criteria contained in the drill evaluation areas as outlined in the Federal Register, Vol.67, No. 80 "FEMA-Radiological Emergency Preparedness: Drill Evaluation Methodology" (April 25, 2002). Detailed information on the extent-of-play agreement used in this drill is found in Appendix C of this report.

# 3.2 Summary Results of Drill Evaluation

The matrix illustrated in Table 3.1, presents the status of all drill evaluation area criteria that were scheduled for demonstration during this drill by all participating jurisdictions and functional entities. Drill criteria are listed by number and the demonstration status is indicated by the use of the following letters:

M - Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior drills)

- D Deficiency assessed
- A ARCA assessed or unresolved ARCA from prior drills

## N - Not Demonstrated

Presented below are definitions of the terms used in this section relative to criteria demonstration status.

- a. Met Listing of the demonstrated drill evaluation area criteria under which no Deficiencies or ARCAs were assessed during this drill and under which no ARCAs assessed during prior drills remain unresolved.
- b. Deficiency Listing of the demonstrated drill evaluation area criteria under which one or more Deficiencies were assessed during this drill. Included is a description of each Deficiency and recommended corrective actions.
- c. Area Requiring Corrective Action Listing of the demonstrated drill evaluation area criteria under which one or more ARCAs were assessed during the current drill. Included is a description of the ARCAs assessed during this drill and the recommended corrective actions to be demonstrated before or during the next medical services drill.
- d. Not Demonstrated Listing of the drill evaluation area criteria that were scheduled to be demonstrated during this drill, but were not demonstrated and the reason they were not demonstrated.

The following are classifications of the types of issues that are discussed in this report:

A Deficiency is defined in the FEMA August 2002, Interim REP Program Manual as "...an observed or identified inadequacy of organizational performance in an drill that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant."

An ARCA is defined in the FEMA August 2002, Interim REP Program Manual as "...an observed or identified inadequacy of organizational performance in a drill that is not considered, by itself, to adversely impact public health and safety."

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

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

- a. Plant Site Identifier A two-digit number corresponding to the Utility Billable Plant Site Codes.
- b. Drill Year The last two digits of the year the drill was conducted.
- c. Evaluation Area Criterion A letter and number corresponding to the criteria in the FEMA REP Drill Evaluation Methodology.
- d. Issue Classification Identifier -D = Deficiency, A = ARCA
- e. Drill Issue Identification Number A separate two digit indexing number assigned to each issue identified in the drill.

After Action Report/Improvement Plan

Diablo Canyon Power Plant

DATE: 2011-08-10				
SITE: Diablo Canyon Power Plant, CA		MEDCOM	San Luis Ambulance	French Medical Hospital
A: ARCA, D: Deficiency, M: Met, N: Not Demonstrated			San Amb	French Medical Hospital
Emergency Operations Management				
Mobilization	1a1			
Facilities	1b1			
Direction and Control	1c1			
Communications Equipment	1d1			
Equip & Supplies to support operations	1e1		М	М
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		М	М
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	5a1			
Activation of the prompt alert and notification system - Exception Areas	5a2			
Emergency information and instructions for the public and the media	5b1			
Support Operations/Facilities				
Mon / decontamination of evacuees and emergency workers, and registration of evacuees	6a1			
Mon / decontamination of ewaculees and emergency workers, and registration of evaculees	6b1			
Temporary care of evacuees	6c1			
Transportation and treatment of contaminated injured individuals	6d1	М	М	М

# **3.3** Criteria Evaluation Summaries

## **3.3.1 Risk Jurisdictions**

## 3.3.1.1 MEDCOM

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

- a. MET: 6.d.1
- b. AREA REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None

## **3.3.2** Private Jurisdictions

## 3.3.2.1 San Luis Ambulance

In summary, the status of the 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. NOT DEMONSTRATED: None

## 3.3.2.2 French Hospital Medical Center

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

- a. MET: 1.e.1, 3.a.1, 6.d.1
- b. AREA REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None

After Action Report/Improvement Plan

# **SECTION 4. CONCLUSION**

FEMA Region IX evaluated a medical services drill on August 10, 2011, in the plume exposure pathway EPZ around DCPP. The purpose of the drill was to assess the level of state and local emergency preparedness in response to a simulated radiological emergency. This drill was held in accordance with FEMA policies and guidance concerning the drill of state and local RERP and procedures.

The findings presented in this AAR are based on the evaluations of the federal evaluation team, with final determinations made by the FEMA Region IX Regional Assistance Committee Chairperson and approved by the Regional Administrator.

There were no Deficiencies and no ARCAs identified during the course of this drill.

Based on the evaluation of the August 10, 2011, medical services drill demonstrations, the offsite radiological emergency response plans for the state of California and the affected local jurisdictions site-specific to DCPP can be implemented, and are adequate to provide reasonable assurance that appropriate measures can be taken offsite to protect the health and safety of the public in the event of a radiological emergency at DCPP.

After Action Report/Improvement Plan

# **APPENDIX A: DRILL EVALUATORS**

Location	Evaluator	Agency
San Luis Obispo County MEDCOM	Richard Echavarria	FEMA RIX
French Hospital Medical Center	Daryl Thome	ICF
San Luis Ambulance	Richard Grundstrom	ICF

FEMA Region IX Site Specialist, Katherine Nishihara FEMA Region IX Senior Site Specialist, Richard Echavarria

# APPENDIX B: ACRONYMS AND ABBREVIATIONS

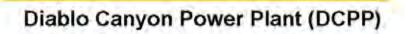
Acronym / Abbreviation	Meaning
AAR	After Action Report
ARCA	Area Requiring Corrective Action
DCPP	Diablo Canyon Power Plant
EPZ	Emergency Planning Zone
FEMA	Federal Emergency Management Agency
KI	Potassium Iodide
ORO	Offsite Response Organization
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan

After Action Report/Improvement Plan

# **APPENDIX C: EXTENT-OF-PLAY**

Presented in this appendix is a compilation of drill scenario materials submitted by the state of California and the DCPP. This appendix contains the extent-of-play agreement prepared by the state of California and approved by FEMA Region IX to provide evaluators with guidance on expected actual demonstration of the evaluation area criteria.

Diablo Canyon Power Plant





EXTENT OF PLAY AGREEMENT

Annual Medical Drill August 10, 2011

FRENCH HOSPITAL MEDICAL CENTER EVALUATED EXERCISE

EVALUATED EXERCISE

## EXTENT OF PLAY

August 10, 2011

# Table of Contents

1.	Purp	ose, Scope & General Concepts	
2.	Re-Demonstration		
3.	Outstanding Issues		
4.	Exter	nt of Play5	
	4.1	Overview	
	4.2	Evaluation Criteria	

EVALUATED EXERCISE

## EXTENT OF PLAY

August 10, 2011

## Acronyms

ARCA	Area Requiring Corrective Action
County OES	
	Diablo Canyon Power Plant
EOC	
EOP	Extent of Play Agreement
EWEC	Emergency Worker Exposure Control
REA	
FEMA	Federal Emergency Management Agency
OES	Office of Emergency Services
Cal EMA	California Emergency Management Agency

After Action Report/Improvement Plan

#### 1. PURPOSE, SCOPE & GENERAL CONCEPTS

On August 10, 2011 Diablo Canyon Power Plant (DCPP) will conduct an annual medical drill. Medical drills are conducted annually at DCPP to provide training for emergency medical services and hospital personnel responsible for transport, treatment and handling of radiological contaminated injured patients.

Medical services and support facilities are identified in the DCPP Emergency Plan along with letters of agreements delineating expected offsite response and assistance.

Offsite Response Organization (ORO) participants in the 2010 DCPP annual medical drill will include French Hospital Medical Center (FHMC) and San Luis Ambulance.

Pacific Gas and Electric Company (PG&E) will also provide additional support staff from DCPP's Security, Radiation Protection, Fire Department and onsite Medical staff.

Exercise evaluation by FEMA will be performed under evaluation criteria selected from FEMA's Radiological Emergency Preparedness (REP) Exercise Evaluation Methodology (EEM).

The purpose of this extent-of-play agreement is to present the evaluation areas that will be demonstrated and to identify planned deviations from the implementation of the applicable Procedures. FHMC, San Luis Ambulance and DCPP staff will implement applicable elements in these procedures unless otherwise specified in this agreement.

Throughout the exercise, real emergencies take priority over exercise play.

The demonstration or exercise phase will terminate when the FEMA lead evaluator and lead exercise controller agree that all required evaluation criteria have been adequately demonstrated and evaluated.

#### 2. RE-DEMONSTRATION

Areas requiring corrective action (ARCAs) may be immediately corrected and re-evaluated during the exercise or immediately following, providing that the re-demonstration is not disruptive, does not interrupt the flow of the exercise, and does not affect other evaluation areas. During demonstrations conducted out-of-sequence, the Controller may have the participants re-demonstrate an activity that is determined to be not satisfactorily demonstrated. Immediate training prior to the re-demonstration may be allowed, again provided that the training and re-demonstration are not disruptive, do not interrupt the flow of the exercise, and do not affect other evaluation areas. If the re-demonstration is performed correctly, the Evaluator will document the issue of concern, with a statement that the issue was corrected during the exercise. If the demonstration is still performed unsuccessfully, the issue will be documented and referred to the RAC Chair to determine the appropriate classification of the issue.

The evaluator may interview players to determine sequence of events or actions that would have been taken if scenario had been different. Evaluator interview of players should not be disruptive nor interrupt flow of the exercise.

#### 3. OUTSTANDING ISSUES

The last FEMA-evaluated Medical Drill conducted at FHMC was held on October 17, 2007. There were no deficiencies and no Areas Requiring Corrective Action (ARCA) found at that exercise.

#### 4. EXTENT OF PLAY

#### 4.1 Overview of Extent of Play

This EOP represents the level of participation and any limitations on the demonstration of Emergency Preparedness Evaluation Area Elements by the participating agencies and organizations. The Emergency Preparedness Evaluation Areas – the elements and sub-elements – for this exercise are those that are required to be demonstrated in annual medical drill exercises, as required by the *hiterim REP Program Manual (August 2002)*.<sup>1</sup> Copies of applicable procedures will be provided to FEMA, Region IX staff.

### 4.2 Evaluation Criteria

4.2.1 Exercise Evaluation Area 1 – Emergency Operations Management

<u>4.2.1.1 Criterion 1.a.1 – Mobilization -</u> Offsite Response Organizations use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.

#### Outstanding Issues; None

Limitations: At the commencement of this exercise a simulated contaminated injured individual will be pre-staged at DCPP within the Protected Area. This location will not be in the Radiological Controlled Area however, it will be simulated as such. An onsite Operations participant will initiate drill communications via a call to MEDCOM at the San Luis Obispo Sheriff's Department Dispatch Center. This 911 call will mobilize personnel to the DCPP Avila Gate and onsite medical facility for patient transfer. FHMC on-shift and/or training staff may be utilized for drill demonstrations to allow for uninterrupted and continuous ER operations. No Emergency Operations Centers (City of San Luis Obispo or San Luis Obispo County) will be staffed or activated in sequence with this exercise demonstration.

<u>4.2.1.2 Criterion 1.e.1: Equipment and Supplies to Support Operations</u> - Demonstrate that equipment, maps, displays, dosimetry, potassium iodide, and other supplies are sufficient to support emergency operations. (NUREG-0654: H.7, 10; J.10.a,b,e; J.11; K.3.a)

#### Outstanding Issues: None

Limitations: San Luis Ambulance Service personnel will maintain exposure control records, however, they will simulate communications and coordination with the San Luis Obispo County EOC since the Emergency Worker Exposure Control (EWEC) Desk and Emergency Medical Services Authority (EMSA) Representative will not be participating in the annual medical drill

4.2.2 Exercise Evaluation Area 3 - Protective Action Implementation

4.2.2.1 Criterion 3.a.1: Implementation of Emergency Worker Exposure Control – Demonstrate the capability to issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers. Demonstrate ability to read dosimetry and record readings appropriately. (NUREG-0654: K.3.a,b)

Outstanding Issues: None.

<u>Limitations</u>: PG&E Radiation Protection may use DCPP dosimetry from the plant or be issued dosimetry from FHMC Radiation Safety Officer. San Luis Ambulance staff will be issued dosimetry at the plant prior to attending to the simulated injured contaminated worker and they will utilize dosimetry contained on their ambulance.

### 4.2.3 Exercise Evaluation Area 6 - Support Operations/Facilities

<u>4.2.3.1 Criterion 6.d.1 Transportation and Treatment of Contaminated Injured Individuals</u> – The facility/ORO has the appropriate space, adequate resources, and trained personnel to provide transport, monitoring, decontamination, and medical services to contaminated injured individuals.

### Outstanding Issues: None

Limitations: Per the annual medical drill scenario, injuries will not be life threatening, which will allow demonstration of contamination control procedures. Following the demonstration of the appropriate decontamination procedures, radiological instrument readings will become "as read" for normal background levels. No blood will be drawn nor x-rays taken as part of this annual medical drill. Internal contamination and decontamination will not be demonstrated per the drill scenario. Procedures for the elimination of internal contamination and use of portable x-ray equipment may be evaluated by interview with the FHMC Emergency Department physician and staff. Once the patient's simulated medical treatment and decontamination have been completed the patient will be transferred from the decontamination/treatment area to the buffer zone and outside the REA while being monitored for the spread of radiological contamination. This will terminate drill play for the simulated patient and allow hospital and PG&E staff to begin demonstrations of protective clothing removal and final surveying of the decontamination/treatment room and the buffer zone of the REA.

After Action Report/Improvement Plan

Diablo Canyon Power Plant

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