



FEMA

October 10, 2013

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

To Whom It May Concern:

Enclosed is one copy of the After Action (AAR) / Improvement Plan (IP) for the March 26 and 27, 2013, Radiological Emergency Preparedness Full Participation Plume and Ingestion Exposure Pathway Exercises for the Clinton Power Station. The State of Illinois; DeWitt, Macon, McLean and Piatt Counties; and the utility owner/operator, Exelon Nuclear participated in this exercise. The AAR/IP was prepared by the U.S. Department of Homeland Security/Federal Emergency Management Agency (DHS/FEMA) Region V, Radiological Emergency Preparedness Program.

There was one Deficiency identified during this exercise for DeWitt County. There were no Deficiencies identified for the State of Illinois, Macon, Mclean or Piatt Counties.

The County of DeWitt received a Deficiency finding under Criterion 5.b.1 – Offsite Response Organizations provide accurate subsequent emergency information and instructions to the public and the news media in a timely manner.

The Deficiency resulted from the failure of the DeWitt County Emergency Operations Center (EOC) staff to provide correct emergency information and instructions to the public in a timely manner after the decision was made to evacuate Sub-Area 1. The decision to evacuate Sub-Area 1 was made at 1222 hours, with sirens to alert the public to be activated at 1230 hours. The Emergency Alert System message was not able to be broadcast until 1248 hours. During the 18 minutes between siren activation and the evacuation message broadcast, the previously issued General Information message was being broadcast. This message informed the public that there was an event taking place at the CPS, and that no evacuation was required at the time.

The Deficiency assessed was based on our findings that individual performance, as well as the decision-making process used by the DeWitt County staff to implement protective action decisions, contributed to the general public not being instructed to evacuate until 26 minutes after the decision was made to evacuate the public. During this delay, the public was informed that no evacuation was required. Protective actions were required for the General Emergency Classification Level declared by the utility concurrent with a release of radioactive material. Subsequently, the general public potentially received unnecessary radiological contamination and exposure. More detailed information regarding Criterion 5.b.1 performance is included in the enclosed narratives.

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NRC

The Deficiency was resolved during a re-demonstration exercise conducted with appropriate DeWitt County personnel on June 19, 2013.

There were no Areas Requiring Corrective Action identified for State of Illinois, DeWitt, Macon, Mclean or Piatt Counties.

There was one Plan Issue identified during this exercise for the State of Illinois and three for DeWitt County. There were no Plan Issues identified for Macon, Mclean or Piatt Counties.

The Plan Issue for the State of Illinois was identified under Criterion 5.a.1 – The Offsite Response Organizations provide accurate emergency information and instructions to the public and news media in a timely manner. The Plan Issue was identified in the Illinois Plan for Radiological Accidents, Volume 1, dated 11/07 (IPRA) and the Standard Operating Procedure RTF-PARS-2, entitled KI PARS (SOP), differ in their description of who is given a recommendation to consider taking KI.

The first Plan Issue for DeWitt County was identified under Criterion 1.a.1 - The Offsite Response Organizations use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. The Plan Issue was identified in DeWitt County Initial Warning Point procedure that directs the staff to a step that does not exist within the procedure.

The second Plan Issue for DeWitt County was identified under Criterion 3.a.1 – The Offsite Response Organizations issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plans/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. Appropriate record keeping of the administration of KI for emergency workers is maintained. The Plan Issue was identified in DeWitt County EOC based on the Dewitt County EOC is within the 10-mile Emergency Planning Zone and the EOC Dosimetry Control Officer did not conduct radiological briefing and dosimetry was not issued to EOC workers.

The third Plan Issue for DeWitt County was identified under Criterion 5.a.1 - The Offsite Response Organizations provide accurate emergency information and instructions to the public and news media in a timely manner. The Plan Issue was identified in that the Dewitt County Plans and the Mutual Aid Agreement between Dewitt County, Clinton Emergency Management Agency, the National Weather Service, Illinois and the radio station state that the message will be read directly on air, while being recorded for future rebroadcasts; however, for the clarity of the message, this does not occur.

Although all Ingestion Pathway Exercise objectives were met, a training opportunity was identified to further enhance the capabilities of the SIRC Liaisons during an Ingestion Pathway Event. A Training Needs Assessment was conducted to assist in identifying the content of the FEMA observed training session. Successful completion of the training session occurred on October 2, 2013, with appropriate agencies.

Based on the results of the March 26 and 27, 2013, exercises, the offsite radiological emergency response plans and preparedness for the State of Illinois and affected local jurisdictions site-specific to the Clinton Power Station 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 the site.

Therefore, the Title 44 CFR, Part 350, approval of the offsite radiological emergency response plans and preparedness for the State of Illinois site-specific to the Clinton Power Station, granted on January 12, 1987, remains in effect.

Copies of this Report were transmitted to the DHS/FEMA National Office, Nuclear Regulatory Commission (NRC) Region III, and the State of Illinois.

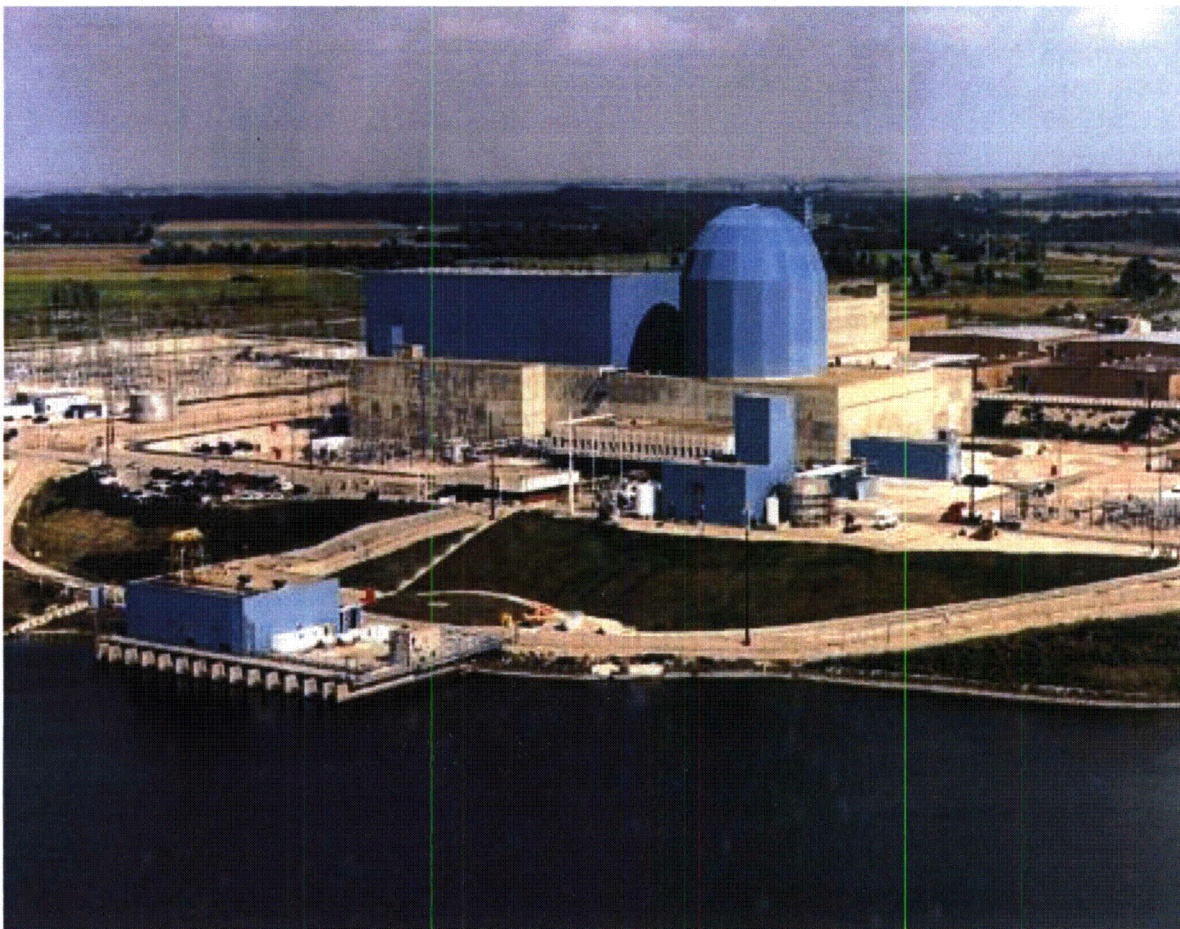
If you have any questions, please contact William E. King, Chairman, Regional Assistance Committee, DHS/FEMA, Region V, at (312) 408-5575.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew Velasquez III", with a stylized flourish at the end.

Andrew Velasquez III
Regional Administrator

Enclosure (1)



Clinton Power Station

After Action Report/ Improvement Plan

Exercise Date - March 26, 2013

Radiological Emergency Preparedness (REP) Program



FEMA

Published October 03, 2013

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EXECUTIVE SUMMARY

On March 26 and 27, 2013, Radiological Emergency Preparedness (REP) Full-Participation Plume Exposure and Ingestion Exposure Pathway Exercises were evaluated by the U.S. Department of Homeland Security (DHS)/Federal Emergency Management Agency (FEMA) for the 10-mile Emergency Planning Zone (EPZ) around the Clinton Power Station (CPS). The purpose of these exercises were to assess the capabilities of the State and local preparedness in responding to a radiological emergency. These exercises were held in accordance with DHS/FEMA's policies and guidance concerning the exercise of State and local Radiological Emergency Response Plans (RERPs) and procedures.

The most recent exercise at this site was conducted on November 02, 2011. The qualifying emergency preparedness exercise was conducted on January 13, 1987.

The DHS/FEMA wishes to acknowledge the efforts of the many individuals who participated in this exercise. In the State of Illinois, the risk county of DeWitt and the support counties of Macon, McLean and Piatt participated along with State Government.

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 on the part of all the participants were evident during this exercise.

This Final After Action Report (AAR)/Improvement Plan (IP) contains the evaluation of the biennial exercise and the evaluation of the following out-of-sequence interviews and activities:

- Illinois State Police (ISP) District 6 Headquarters Dosimetry Control Officers (DCO) Briefing;
- ISP Traffic and Access Control Post (TACP) at the ISP District 6 Headquarters;
- Medical Services (MS-1) Transportation and Hospital evaluation at St Mary's Hospital;
- Monitoring and Decontamination of evacuees and their vehicles;
- Public Registration and Congregate Care;
- Clinton Police Department DCO Briefing;
- Clinton Police Department TACP.

There was one Deficiency identified during this exercise for DeWitt County. There were no

Deficiencies identified for the State of Illinois, Macon, Mclean or Piatt Counties. The Deficiency was resolved during a re-demonstration exercise conducted with appropriate DeWitt County personnel on June 19, 2013.

There were no Areas Requiring Corrective Action (ARCA) identified for State of Illinois, DeWitt, Macon, Mclean or Piatt Counties.

There was one Plan Issue identified during this exercise for the State of Illinois and three for DeWitt County. There were no Plan Issues identified for Macon, Mclean or Piatt Counties.

Although all Ingestion Pathway Exercise objectives were met, a training opportunity was identified to further enhance the capabilities of the SIRC Liaisons during an Ingestion Pathway Event. A Training Needs Assessment was conducted to assist in identifying the content of the FEMA observed training session. Successful completion of the training occurred on October 2, 2013, for appropriate agencies.

Sections 3 and 4 of this report provide detailed information regarding any Deficiencies, ARCAs, Plan Issues and Schedule of Corrective Actions.

INTRODUCTION - EXERCISE BASIS

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all offsite nuclear planning and response. The DHS/FEMA's activities are conducted pursuant to Title 44 of the Code of Federal Regulations (CFR) Parts 350 "Review and Approval of State and Local Radiological Emergency Plans and Preparedness", 351 "Radiological Emergency Planning and Preparedness" and 352 "Commercial Nuclear Power Plants: Emergency Preparedness Planning" (Commonly referred to as 44 CFR 350 through 352). These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

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

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

- Taking the lead in offsite emergency planning and in the review and evaluation of RERPs and procedures developed by State and local governments;
- Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by State and local governments;
- 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, (Federal Register, Vol. 58, No. 176, September 14, 1993); and
- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:

- U.S. Department of Agriculture;
- U.S. Department of Commerce;
- U.S. Department of Energy;
- U.S. Department of Health and Human Services;
- U.S. Department of the Interior;
- U.S. Department of Transportation;
- U.S. Environmental Protection Agency;
- U.S. Food and Drug Administration; and
- U.S. Nuclear Regulatory Commission.

Representatives of these agencies serve on the DHS/FEMA Region V Regional Assistance Committee (RAC), which is chaired by DHS/FEMA.

Formal submission of the RERPs for the CPS to FEMA Region V by the State of Illinois and involved local jurisdictions occurred on November 25, 1986. Formal approval of these RERPs was granted by FEMA on August 5, 1987, under 44 CFR 350.

A REP Full-Participation Plume Exposure Pathway Exercise and an Ingestion Exposure Pathway Exercise were conducted on March 26 and 27, 2013, and evaluated by the DHS/FEMA to assess the capabilities of State and local offsite emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological

emergency involving the CPS. The purpose of this AAR/IP is to present the exercise results and findings based on the performance of the Offsite Response Organizations (OROs) during a simulated radiological emergency.

The findings presented in this AAR/IP are based on the evaluations of the Federal evaluation team, with final determinations made by the DHS/FEMA Region V RAC Chairperson, and approved by the DHS/FEMA Headquarters.

The criteria utilized in the FEMA evaluation process are contained in:

- 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 Radiological Emergency Preparedness: Exercise Evaluation Methodology, as published in the FEMA Radiological Emergency Preparedness Manual, dated April 2012, which supersedes the Federal Register Notice, Vol. 67, No. 80, dated April 25, 2002.

Section 1 of this report, entitled "Exercise Overview," presents information pertaining to the team that planned and coordinated the exercise. This section also provides a listing of all participating jurisdictions and functional entities that were evaluated.

Section 2 of this report, entitled "Exercise Design Summary," contains the purpose and design of the exercise, a description of the exercise objectives and presents basic information and data relevant to the exercise scenario.

Section 3 of this report, entitled "Analysis of Capabilities," presents detailed information on the demonstration of applicable exercise criteria at each jurisdiction or functional entity evaluated in a jurisdiction-based, issues-only format. This section also contains: (1) descriptions of all Deficiencies, ARCAs, and Plan Issues if any, assessed during this exercise, recommended corrective actions, and the State and local governments' schedule of corrective actions, if applicable, for each identified exercise issue; and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs' efforts to resolve them.

Section 4 of this report, entitled "Conclusion," presents the DHS/FEMA summary of overall

exercise conduct and results as evaluated against the requirements of 44 CFR 350.

EMERGENCY PLANNING ZONE (EPZ) DESCRIPTION

The CPS is located approximately seven miles northeast of the City of Clinton in Harp Township, within DeWitt County, Illinois. DeWitt County is located near the geographical center of the State of Illinois. The topography of the area is predominantly rolling prairies.

The EPZ for the CPS is an area approximately the area of a ten-mile radius with the CPS as the center point. The EPZ extends approximately ten miles outward in all directions from the CPS for the plume exposure pathway planning zone and fifty miles outward for the ingestion exposure pathway planning zone. In the event of a serious accident at the CPS, the plume exposure EPZ will be the area in which intensive efforts will be made to notify and protect residents and transient population from exposure to radiation. The 10-mile EPZ contains a total population of 12,702 (2010 census) within the risk county of DeWitt, and the support counties of Macon, McLean and Piatt. Nearly two-thirds of the total 10-mile EPZ population (8,422) resides in the communities of Clinton, Weldon, Wapella and DeWitt. The land use within the 10-mile EPZ is predominantly agricultural, with cash grain crops of corn and soybeans. The closest industries are located in the community of Clinton.

Recreational facilities outside the municipalities include the Clinton Lake State Recreation Area and the Weldon Springs State Park. The park encompasses approximately 370 acres and contains a 28-acre lake with camping, fishing, and picnicking facilities. Weldon Springs is one of the two sizable lakes within 10 miles of the site. Clinton Lake is a 4,895 acre man-made cooling lake within the CPS property lines. Recreational facilities accommodate camping, boating, hunting, fishing and hiking.

The nearest major highways are State Highways 54, 10, and 48, all of which intersect the plant location. Other major thoroughfares are U.S. Highway 51, located about six miles west of the plant and Interstate Highway 74, located about 11 miles northeast of the plant. The nearest railroad is the Canadian National Railway (CN), which crosses the site east to west and comes within about three-fourths of a mile to the north of the reactor centerline. Another CN track is located approximately three and a half miles south of the CPS.

SECTION 1: EXERCISE OVERVIEW

1.1 Exercise Details

Exercise Name

Clinton Power Station

Type of Exercise

Ingestion

Exercise Date

March 26, 2013

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 Clinton Power Station exercise:

State Jurisdictions
Alert Systems Operator
American Red Cross
Attorney General

Capitol Development Board
Center on Aging
Central Management Systems
Chief of Operations
Communications
Communications Center Supervisor
Department of Corrections
Department of Human Services
Disaster Assistance Program
Emergency Response Communicators
EOF Liaison
Executive Staff
Executive Officer
Finance
GIS Operator
Health Physics Assistant
Hotline Coordinator
Hotline Operators
Health Physics Communicator
Health Physics Specialist
Illinois Department of Transportation - Aeronautics
Illinois Commerce Commission
Illinois Department of Agriculture
Illinois Department of Commerce and Economic Opportunity
Illinois Department of Natural Resources
Illinois Department of Public Health
Illinois Department of Transportation
Illinois Department of Transportation - Highway
Illinois Emergency Management Agency
Illinois Emergency Management Agency (IEMA) Radiological Officer
Illinois Emergency Management Agency (IEMA) State Liaison
Illinois Emergency Management Agency Department of Nuclear Safety
Illinois Environmental Protection Agency
Illinois Law Enforcement Alarm System

Illinois National Guard
Illinois Public Works Mutual Aid Network
Illinois State Police
Information Technology
JIC Liaison
Legal
Legislative Liaison
Liaison Officer
Logistics
Mutual Aid Box Alarm System (MABAS)
National Guard Civil Support
NTRC Manager
Order of State Francis Hospital
Public Information Officer
REAC Manager
REAC Operator
Reactor Assistant
Reactor Specialist
Revenue Investments
Secretary of State
SEOC Liaison
State Incident Response Center Manager
TSC Liaison
Volunteer Agencies Active in Disaster
Risk Jurisdictions
DeWitt County Chief Executive Officer
Clinton Fire Department
Clinton Police Department
DeWitt County American Red Cross Representative
DeWitt County Board Chairperson
DeWitt County Coroner
DeWitt County Doctor John Warner Hospital Administrator
DeWitt County EMA Coordinator
DeWitt County Emergency Communications Specialist

DeWitt County Engineer
DeWitt County Health Department Administrator
DeWitt County Highway Department
DeWitt County Public Information Officer
DeWitt County Red Cross Coordinator
DeWitt County Sheriff's Department
DeWitt/Livingston/McLean Counties Regional Office of Education
Mayor of Clinton
Wapella Mayor/Liaison
Weldon Village President

Support Jurisdictions

American Red Cross of the Heartland
City of Decatur Fire Department
City of Decatur Mayor
City of Decatur Police Department
Kirby Ambulance
Kirby Medical Center
Macon County Board Chariman
Macon County Coroner
Macon County Emergency Management Agency (EMA)
Macon County Department of Mental Health
Macon County Department of Public Health
Macon County Emergency Communication Center
Macon County Highway Department
Macon County Mental Health Board
Macon County Mutual Aide Box Alarm System (MABAS)
Macon County Sheriff Department
Macon County Telecommunication Center
McLean County Administrator
McLean County Emergency Management Agency
McLean County Health Department
McLean County Sheriff's Department
Mid-Piatt Fire Department
Piatt County HAMS

Piatt County Highway Department

Piatt County Sheriff's Department

St. Mary's Hospital

United Way

Private Organizations

Exelon Nuclear

Federal Jurisdictions

Federal Emergency Management Agency

National Weather Service

Nuclear Regulatory Commission

SECTION 2: EXERCISE DESIGN SUMMARY

2.1 Exercise Purpose and Design

The DHS/FEMA Region V Office evaluated the CPS REP Full-Participation Plume Exposure and Ingestion Exposure Pathway Exercises conducted on March 26 and 27, 2013, 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 the CPS. The purpose of this report is to present the results and findings on the performance of the OROs during a simulated radiological emergency.

2.2 Exercise Objectives, Capabilities and Activities

Exercise objectives and identified Capabilities/REP Criteria selected to be demonstrated are discussed in Appendix E “Exercise Plan.”

The Exercise Planning Team (EPT) selected objectives that focus on evaluating emergency response procedures, identifying areas for improvement, and fostering collaboration between the various OROs and stakeholders. This exercise focused on the following objectives:

- ORO demonstration of effective Emergency Operations Management;
- ORO demonstration of effective Protective Action Decision Making;
- ORO demonstration of effective Protective Action Implementation;
- ORO demonstration of effective Field Measurement and Analysis;
- ORO demonstration of effective Emergency Notification and Public Information;
- ORO demonstration of effective Support Operations and Facilities.

2.3 Scenario Summary

Appendix F “Scenario Details,” contains a summary of the Exercise Scenario, a simulated sequence of events that was used as the basis for invoking emergency response actions by OROs during the CPS REP Full-Participation Plume Exposure and Ingestion Exposure Pathway Exercises on March 26 and 27, 2013.

Results of a technical review of the scenario, submitted on January 25, 2013, indicate that the scenario was adequate to support demonstration of DHS/FEMA requirements, as well as criteria

selected by the Offsite Response Organizations provided in the State's January 25, 2013, and revised February 25, 2013, extent-of-play submissions.

During the exercise, in addition to information and data provided through the CPS onsite scenario, controllers from the State of Illinois provided "inject messages" containing scenario events and/or relevant data to those persons or locations who would normally receive notification of such events. These inject messages were the method used for invoking additional specific response actions by OROs.

SECTION 3: ANALYSIS OF CAPABILITIES

3.1 Exercise 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 March 26 and 27, 2013, Clinton Power Station (CPS) Radiological Emergency Preparedness (REP) Full-Participation Plume Exposure and Ingestion Exposure Pathway Exercises conducted to test the offsite emergency response capabilities of State and local governments in the 10-mile Emergency Planning Zone surrounding the CPS.

Each jurisdiction and functional entity was evaluated based on its demonstration of exercise criteria delineated in FEMA Radiological Emergency Preparedness: Exercise Evaluation Methodology, as published in the FEMA Radiological Emergency Preparedness Manual, dated April 2012. Detailed information on the exercise criteria and the Extent-of-Play agreements used in this exercise are found in Appendix E “Exercise Plan” of this report.

Presented below are definitions of the terms used in this report relative to the criteria demonstration status:

- **M – Met:** The jurisdiction or functional entity performed all activities under the Demonstration Criterion to the level required in the Extent-of-Play Agreement, with no Deficiencies or ARCAs assessed under that criterion in the current exercise and no unresolved prior ARCAs.

- **D – Deficiency:** An observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

- **A – Area Requiring Corrective Action –** An observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety. Listing of the demonstrated exercise criteria under which one or more ARCAs was/were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of any ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.

-
- **P – Plan Issue** – An observed or identified inadequacy in the ORO’s emergency plan or implementing procedures, rather than in the ORO’s performance.
 - **N – Not Demonstrated** – Exercise criteria that were not demonstrated as scheduled during this exercise and the reason(s) they were not demonstrated.
 - **Prior ARCAs - Resolved** – Descriptions of ARCAs assessed during previous exercises that were resolved and the corrective actions demonstrated, in this exercise.
 - **Prior ARCAs - Unresolved** – Descriptions of ARCAs assessed during prior exercises that were not resolved in this exercise. Included is the reason the ARCA remains unresolved and recommended corrective actions to be demonstrated before or during the next exercise.

3.2 Summary Results of Exercise Evaluation

The matrix presented in Table 3.1, on the following pages, presents the status of all exercise criteria from FEMA Radiological Emergency Preparedness: Exercise Evaluation Methodology, as published in the FEMA Radiological Emergency Preparedness Manual, dated April 2012, which were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. The criterion status box is blank if it was not scheduled for demonstration.

This subsection provides information on the evaluation of each participating jurisdiction and functional entity in a jurisdiction-based, issues-only format.

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

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

- **Plant Site Identifier** – A two-digit number, corresponding to the Utility Billable Plant Site Code (13 for CPS).

- **Exercise Year** – The last two digits of the year the exercise was conducted.
- **Criterion Number** – The letters and numbers corresponding to the Demonstration Criterion in Part III.C of the FEMA REP Program Manual.
- **Issue Classification Identifier** – (D = Deficiency, A = ARCA, P = Plan Issue).
- **Exercise Identification Number** – A separate two (or three) digit indexing number assigned to each issue identified in the exercise.

Table 3.1 - Summary of Exercise Evaluation (3 pages)

DATE: 2013-03-26 SITE: Clinton Power Station, IL M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		IL - IWP	IL - SIRC	IL - PIPB Hotline	IL - REAC	IL - UAC	IL - RAFT	IL - Mobile Lab	IL - FMT-1	IL - FMT-2	IL - EOC DEW - IL SRA	IL - EOC DEW - IL SL	IL - EOC MAC - IL SL	IL - EOC MCL - IL SL
Emergency Operations Management														
Mobilization	1a1	M	M	M	M	M	M	M	M	M				
Facilities	1b1													
Direction and Control	1c1		M		M	M	M					M	M	M
Communications Equipment	1d1	M	M		M	M	M	M	M	M				
Equipment and Supplies to Support Operations	1e1		M	M	M	M	M	M	M	M				
Protective Action Decision Making														
EW Exposure Control Decisions	2a1		M		M						M			
PARs	2b1		M		M									
PADs	2b2		M		M	M					M			
PADs for Disabled/Functional Needs	2c1		M		M						M			
Ingestion PADs	2d1		M		M									
RRR Decisions	2e1		M		M									
Protective Action Implementation														
EW Exposure Control Implementation	3a1						M	M	M	M	M			
KI Public/Institutionalized	3b1				M						M			
PAD Implementation Disabled/Functional Needs	3c1													
PAD Implementation Schools	3c2													
TACP Establishment	3d1					M								
Impediments	3d2					M								
Implement Ingestion PADs	3e1		M		M									
Ingestion Pathway Decisions	3e2		M		M									
Implementation of RRR Decisions	3f1		M		M									
Field Measurement and Analysis														
RESERVED	4a1													
Field Team Management	4a2						M							
Field Team Operations	4a3								M	M				
Field Team Sampling	4b1						M		M	M				
Laboratory Operations	4c1							M						
Emergency Notification and Public Info														
Initial Alert & Notification	5a1		M								M	M		
RESERVED	5a2													
Backup Alert & Notification	5a3													
Exception Area Alerting	5a4													
Subsequent Information & Instructions	5b1		P	M	M	M					M	M		
Support Operations/Facilities														
Reception Center Operations	6a1													
EW Monitoring & Decontamination	6b1						M							
Congregate Care	6c1													
Contaminated Injured Transport & Care	6d1													

Table 3.1 - Summary of Exercise Evaluation (Continued. page 2/3)

DATE: 2013-03-26 SITE: Clinton Power Station, IL M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		IL - EOC PIA - IL SL	IL - ISP D6 HQ - DCO B	IL - ISP D6 HQ - TACP	IL - St Mary's Hosp - MS1F	IL-Stephen Decatur-EMDEq	IL-Stephen Decatur-EvWM	IL-Stephen Decatur-EvWD	IL-Stephen Decatur-EvR	IL-Stephen Decatur-CC	DEW - IWP	DEW - EOC	DEW - EOC - TACP	DEW - Clinton PD - TACP
Emergency Operations Management														
Mobilization	1a1										M	P		
Facilities	1b1													
Direction and Control	1c1	M					M					M		
Communications Equipment	1d1			M	M	M	M	M	M	M	M	M	M	M
Equipment and Supplies to Support Operations	1e1		M	M	M	M	M	M	M			M	M	M
Protective Action Decision Making														
EW Exposure Control Decisions	2a1													
PARs	2b1													
PADs	2b2											M		
PADs for Disabled/Functional Needs	2c1											M		
Ingestion PADs	2d1													
RRR Decisions	2e1													
Protective Action Implementation														
EW Exposure Control Implementation	3a1		M	M	M				M			P	M	M
KI Public/Institutionalized	3b1											M		
PAD Implementation Disabled/Functional Needs	3c1											M		
PAD Implementation Schools	3c2											M		
TACP Establishment	3d1			M								M	M	M
Impediments	3d2											M		
Implement Ingestion PADs	3e1													
Ingestion Pathway Decisions	3e2													
Implementation of RRR Decisions	3f1													
Field Measurement and Analysis														
RESERVED	4a1													
Field Team Management	4a2													
Field Team Operations	4a3													
Field Team Sampling	4b1													
Laboratory Operations	4c1													
Emergency Notification and Public Info														
Initial Alert & Notification	5a1											P		
RESERVED	5a2													
Backup Alert & Notification	5a3													
Exception Area Alerting	5a4													
Subsequent Information & Instructions	5b1											M		
Support Operations/Facilities														
Reception Center Operations	6a1					M	M	M	M					
EW Monitoring & Decontamination	6b1													
Congregate Care	6c1									M				
Contaminated Injured Transport & Care	6d1				M									

Table 3.1 - Summary of Exercise Evaluation (Continued. page 3/3)

DATE: 2013-03-26 SITE: Clinton Power Station, IL M: Met, A: ARCA, D: Deficiency, P: Plan Issue, N: Not Demonstrated		DEW-Clinton	PD-D	DEW EAS	MAC - IWP	MAC - EOC	MAC-EOC-TACP	MCL - IWP	MCL - EOC	MCL-EOC-TACP	PIA - IWP	PIA - EOC	PIA - EOC -TACP	IL-Decatur Amb
Emergency Operations Management														
Mobilization	1a1				M	M		M	M		M	M		
Facilities	1b1											M		
Direction and Control	1c1				M				M			M		
Communications Equipment	1d1			M	M	M	M	M	M	M	M	M	M	M
Equipment and Supplies to Support Operations	1e1	M				M	M		M	M		M	M	M
Protective Action Decision Making														
EW Exposure Control Decisions	2a1													
PARs	2b1													
PADs	2b2													
PADs for Disabled/Functional Needs	2c1													
Ingestion PADs	2d1													
RRR Decisions	2e1													
Protective Action Implementation														
EW Exposure Control Implementation	3a1	M				M	M		M	M		M	M	N
KI Public/Institutionalized	3b1													
PAD Implementation Disabled/Functional Needs	3c1													
PAD Implementation Schools	3c2													
TACP Establishment	3d1					M	M		M	M		M	M	
Impediments	3d2					M			M			M		
Implement Ingestion PADs	3e1													
Ingestion Pathway Decisions	3e2													
Implementation of RRR Decisions	3f1													
Field Measurement and Analysis														
RESERVED	4a1													
Field Team Management	4a2													
Field Team Operations	4a3													
Field Team Sampling	4b1													
Laboratory Operations	4c1													
Emergency Notification and Public Info														
Initial Alert & Notification	5a1			M										
RESERVED	5a2													
Backup Alert & Notification	5a3													
Exception Area Alerting	5a4													
Subsequent Information & Instructions	5b1													
Support Operations/Facilities														
Reception Center Operations	6a1													
EW Monitoring & Decontamination	6b1													
Congregate Care	6c1													
Contaminated Injured Transport & Care	6d1													M

3.3 Criteria Evaluation Summaries

3.3.1 Illinois Jurisdictions

3.3.1.1 State of Illinois - Initial Warning Point

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

- a. MET: 1.a.1, 1.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 State of Illinois - State of Illinois Response Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 2.d.1, 2.e.1, 3.e.1, 3.e.2, 3.f.1, 5.a.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. PLAN ISSUES: 5.b.1.

ISSUE NO.: 13-13-5b1-P-01

CRITERION: OROs provide accurate emergency information and instructions to the public and news media in a timely manner.

CONDITION: The Illinois Plan for Radiological Accidents, Volume 1, dated 11/07 (IPRA) and the Standard Operating Procedure RTF-PARS-2, entitled KI PARS (SOP), differ in their description of who is given a recommendation to consider taking KI. The IPRA states at I(1), pg. 14, that immobile populations, emergency workers and the general population who possess KI need to make the decision whether to ingest it. However, the SOP in paragraphs 3.1, 3.2, and 4.4(B) mentions immobile populations and emergency workers but does not mention the general

public.

POSSIBLE CAUSE: Incomplete cross-checking between the IPRA and the related SOPs.

REFERENCE: NUREG-0654/FEMA-REP-1, E.7

EFFECT: Public information announcements could be issued that do not include the recommendation to members of the general public that they should make the decision whether or not to take KI.

RECOMMENDATION: Revise the SOP with language that matches the wording in the IPRA to include mention of the general public in addition to immobile populations and emergency workers.

CORRECTIVE ACTION SCHEDULED: Per IEMA - IPRA Volume 1 language is currently being revised in IPRA Volume 1 and SOPs to more accurately reflect the State's new KI program for the general public.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.1.3 State of Illinois - Public Inquiry Phone Bank

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

- a. MET: 1.a.1, 1.e.1, 5.b.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

3.3.1.4 State of Illinois - Radiological Emergency Assessment Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 2.d.1, 2.e.1, 3.b.1, 3.e.1, 3.e.2, 3.f.1, 5.b.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

3.3.1.5 State of Illinois - Unified Area Command

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.b.2, 3.d.1, 3.d.2, 5.b.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

3.3.1.6 State of Illinois - Radiological Assessment Field Team

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 4.a.2, 4.b.1, 6.b.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

3.3.1.7 State of Illinois - Mobile Laboratory

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

- a. MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.c.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

3.3.1.8 State of Illinois - Field Monitoring Team - 1

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

- a. MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3, 4.b.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

3.3.1.9 State of Illinois - Field Monitoring Team - 2

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

- a. MET: 1.a.1, 1.d.1, 1.e.1, 3.a.1, 4.a.3, 4.b.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

3.3.1.10 State of Illinois - Dewitt County Emergency Operations Center - Illinois State Radiological Advisor

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

- a. MET: 2.a.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 5.a.1, 5.b.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

3.3.1.11 State of Illinois - Dewitt County Emergency Operations Center - Illinois State Liaison

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

- a. MET: 1.c.1, 5.a.1, 5.b.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

3.3.1.12 State of Illinois - Macon County Emergency Operations Center - Illinois State Liaison

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

- a. MET: 1.c.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

3.3.1.13 State of Illinois - McLean County Emergency Operations Center - Illinois State Liaison

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

- a. MET: 1.c.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

3.3.1.14 State of Illinois - Piatt County Emergency Operations Center - Illinois State Liaison

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

- a. MET: 1.c.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

3.3.1.15 State of Illinois - Illinois State Police District 6 Headquarters - Dosimetry Control Officer Briefing

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

- a. MET: 1.e.1, 3.a.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

3.3.1.16 State of Illinois - Illinois State Police District 6 Headquarters - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.1.17 State of Illinois - St. Mary's Hospital - Medical Service - Facility

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

- a. MET: 1.d.1, 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

3.3.1.18 State of Illinois - Stephen Decatur School - Evacuee Emergency Worker Monitoring and Decontamination of Equipment

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

- a. MET: 1.d.1, 1.e.1, 6.a.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

3.3.1.19 State of Illinois - Stephen Decatur School - Evacuee/Emergency Worker Monitoring

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

- a. MET: 1.c.1, 1.d.1, 1.e.1, 6.a.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

3.3.1.20 State of Illinois - Stephen Decatur School - Evacuee/Emergency Worker Decontamination

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

- a. MET: 1.d.1, 1.e.1, 6.a.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

3.3.1.21 State of Illinois - Stephen Decatur School - Evacuee Registration

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 6.a.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

3.3.1.22 State of Illinois - Stephen Decatur School - Congregate Care Center

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

- a. MET: 1.d.1, 6.c.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

3.3.1.23 State of Illinois - Decatur Ambulance - Medical Service - Transportation

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

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

3.3.2 Risk Jurisdictions

3.3.2.1 Dewitt County - Initial Warning Point

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

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

ISSUE NO.: 13-11-1a1-P-02

ISSUE: The Primary and Alternate points of contact for Macon County are reversed in the DeWitt County Annex 2G Notification Lists.

CORRECTIVE ACTION DEMONSTRATED: The correction was made in the March 2013 plan updates for Dewitt County.

g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.2 Dewitt County - Emergency Operations Center

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

- a. MET: 1.c.1, 1.d.1, 1.e.1, 2.b.2, 2.c.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: 5.b.1.

ISSUE NO.: 13-13-5b1-D-01

CRITERION: OROs provide accurate emergency information and instructions to the public and news media in a timely manner.

CONDITION: The Deficiency resulted from the failure of the DeWitt County Emergency Operations Center (EOC) staff to provide correct emergency information and instructions to the public in a timely manner after the decision was made to evacuate Sub-Area 1. The decision to evacuate Sub-Area 1 was made at 1222 hours, with sirens to alert the public to be activated at 1230 hours. The Emergency Alert System message was not able to be broadcast until 1248 hours. During the 18 minutes between siren activation and the evacuation message broadcast, the previously issued General Information message was being broadcast. This message informed the public that there was an event taking place at the CPS, and that no evacuation was required at the time.

POSSIBLE CAUSE: The Deficiency assessed was based on our findings that individual performance, as well as the decision-making process used by the DeWitt County staff to implement protective action decisions, contributed to the general public not being instructed to evacuate until 26 minutes after the decision was made

to evacuate the public.

REFERENCE: NUREG 0654, J.9

Illinois Plan for Radiological Accidents (IPRA), Clinton - Volume VIII, Chapter 2, Annex 2A, DeWitt County Checklist Procedures, Dewitt County/Clinton EMA Coordinator checklist, dated 03/13

EFFECT: The general public not being instructed to evacuate until 26 minutes after the decision was made to evacuate the public.

CORRECTIVE ACTION DEMONSTRATED: On June 19, 2013, a Deficiency re-demonstration of Criterion 5.b.1, offsite response organizations provide accurate emergency information and instruction to the public and the news media in a timely manner was successfully conducted by DeWitt County. The Deficiency was assessed at the Full-Participation Plume Exposure Pathway Radiological Emergency Preparedness Exercise for Clinton Power Station (CPS), on March 26, 2013. The re-demonstration was conducted at the DeWitt County Emergency Operations Center (EOC), 201 West Washington Street, Clinton, Illinois from 1000 hours to 1045 hours.

The following EOC staff was present for the re-demonstration: DeWitt County Board Chairperson, DeWitt County Emergency Management Agency (EMA) Coordinator, DeWitt County Sheriff, DeWitt County Public Information Officer (PIO), City Of Clinton Police Chief and the City of Clinton Mayor. These personnel are the key staff necessary for the EOC to be considered operational. There was also an Administrative Assistant present to provide support. Placards were in place with the staff members' titles and each had their appropriate procedures, message logs and administrative supplies to conduct operations.

The Illinois Emergency Management Agency (IEMA) Controller provided the scenario, by message injects to the EOC staff and coordinated the re-demonstration to real time. At 1000 hours, the Controller provided Nuclear Accident Reporting System (NARS) Form Message No. 1, which indicated that a Site Area Emergency (SAE) Emergency Classification Level (ECL) had been declared by CPS at 0746 hours, and received and verified with IEMA, by DeWitt County at 0811 hours. The

NARS Form indicated that there was no radiological release or protective action recommendations (PARs) and the wind was from 210 degrees at 5.1 miles per hour.

The Controller then provided the EOC staff with a scenario message inject. This inject indicated that the DeWitt County EOC was fully staffed (simulated) and operational as of 0945 hours, in response to the SAE ECL at CPS. The EOC personnel had started performing their assigned tasks per their procedures and were available for response. A General Information Message had been issued to the public, the alert and notification system (ANS) was activated and an emergency alert system (EAS) message provided to the radio station for broadcast. This EAS message was currently being broadcast every 15 minutes, informing the public in the 10-mile Emergency Planning Zone (EPZ) of the incident at the CPS and directing them to stay tuned for additional information. All actions had been coordinated, per procedures, with the support Counties in the 10-mile EPZ.

The EMA Coordinator then led a discussion of the current situation, as dictated by the scenario. An SAE magnetic placard was placed on the wall and downwind hazard template was placed on the laminated Illinois Plan for Radiological Accidents (IPRA) Map D (CPS 10-mile EPZ) using the current wind direction, to provide situational awareness. Using the template, the EMA Coordinator explained that the potentially affected areas were Sub-Areas 1, 2 and 3. The EMA Coordinator directed the staff to complete their procedure checklists, as required for a SAE ECL. The Sheriff and Police Chief discussed potential traffic and access control points (TACPs) using IPRA Map A (TACP). They also reviewed the potential evacuation routes and coordination of support personnel for TACPs, including contacting (simulated) the Illinois State Police. The Mayor indicated that based on the current wind direction that the city of Clinton was not in the potential hazard area. The EMA Coordinator insured that all staff had completed their procedures.

At 1016 hours, the Controller provided NARS Form Message No. 2, which indicated that a General Emergency (GE) ECL had been declared by CPS at 0948 hours, and received and verified with IEMA, by DeWitt County at 1016 hours. This message indicated that a gaseous radiological release was occurring, the wind was from 210 degrees at 2.6 mile per hour and a PAR to evacuate Sub-Area 1. A discussion of the PAR was conducted by the staff with the County Board Chairperson questioning the

PAR, specifically if additional Sub-Areas should be included. The EMA Coordinator indicated that the PAR was based on CPS and the State of Illinois analysis of the radiological release and that additional input would be provided by the State of Illinois Radiological Liaison and CPS Liaison, which would be present in the EOC during an actual incident. Based on this discussion, at 1021 hours, the County Board Chairperson made a protective action decision (PAD) to evacuate Sub-Area 1.

The EMA Coordinator directed the PIO to compose the EAS message. The PIO utilized the pre-scripted EAS message and procedures from IPRA VIII, Chapter 2, Annex 2A, pages 51-56, to complete the message. The pre-scripted messages are completed by using sticky labels with information specific to each Sub-Area, such as evacuation routes and reception centers. The Sheriff and Police Chief used IPRA Map A, with a template for Sub-Area 1 to coordinate the necessary TACP staffing. The EMA Coordinator indicated that the DeWitt County Health Department would be coordinating the support of special needs in Sub-Area 1.

At 1024 hours, the EAS message was provided to the County Board Chairperson for review, and the EMA Coordinator determined the ANS would be activated at 1030 hours. It was decided, that to avoid any confusion, to not include information on schools (evacuation and relocation) IPRA VIII, Chapter 2, Annex 2A, page 54, since the schools were not in session. The County Board Chairperson inquired about evacuation routes to insure that the public was not being directed towards the radiological release. The EMA Coordinator indicated that three reception centers would be activated and this would provide the public access without risk of exposure.

At 1025 hours, the County Board Chairperson approved the EAS message. The EMA Coordinator indicated that the activation of the ANS would be coordinated with the support Counties and then a time to broadcast the EAS message would be determined. At 1029 hours, the EMA Coordinator (simulated) completed the coordination with the support Counties. The EMA Coordinator announced to the EOC that the sirens would be activated at 1030 hours and then the PIO would contact the radio station to broadcast the EAS message. The EMA Coordinator also indicated that, if present, all EOC staff would be prompted to complete their required procedures for a GE ECL and evacuation, then queried on the status of their progress.

At 1030 hours, the PIO called the radio station (simulated). The PIO informed the radio station to stop broadcasting the General Information Message and then read the complete EAS Message. At 1034 hours, the PIO was finished and informed the EMA Coordinator. The EMA Coordinator indicated that the EAS message would be sent by facsimile to the Joint Information Center and the appropriate radio station. The EAS message contained the required elements and was to be broadcast (simulated) every 15 minutes.

All activities described in the demonstration of this criterion were carried out in accordance with the plan, procedures and extent-of-play agreement.

d. PLAN ISSUES: 1.a.1, 3.a.1, 5.a.1.

ISSUE NO.: 13-13-1a1-P-03

CRITERION: OROs use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner.

CONDITION: Clinton Plan VIII (2A) page 81 Step 1 directs the IWP that if EOC is activated "Continue on to number 4" but there is no step 4. This is under IWP actions for notification of an Emergency Classification Level of Site Area Emergency.

POSSIBLE CAUSE: Step removed inadvertently or misprint.

REFERENCE: NUREG 0654/FEMA REP-1 E.1

EFFECT: Could cause confusion during notification process.

RECOMMENDATION: Correct step numbering or determine if step 4 was inadvertently deleted.

CORRECTED ACTION DEMONSTRATED: Reported by IEMA - 1.a.1 - missing step #4 - correction has already been completed.

ISSUE NO.: 13-13-3a1-P-04

CRITERION: The Offsite Response Organizations issue appropriate dosimetry, potassium iodide (KI), and procedures, and manage radiological exposure to emergency workers in accordance with the plans/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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

CONDITION: The Dewitt County EOC is within the 10 mile EPZ and the EOC DCO did not conduct radiological briefing and dosimetry was not issued to EOC workers. The plans/procedures did not identify that dosimetry, including DRDs and PRDs, were to be issued to emergency workers.

The plans/procedures should describe the capabilities to provide DRDs/LDs to emergency workers who could be exposed to ionizing radiation.

Those individuals assigned to the EOC which is within the 10-mile Emergency Planning Zone (EPZ) are required to have an LD. Group dosimetry for these emergency workers is permitted as long as the individuals remain working in the same area. Group dosimetry is accomplished by issuing a LD to each individual, then using one or more area DRDs to monitor exposure of the entire group.

POSSIBLE CAUSE: The EOC DCO was not aware of the requirement to have LDs for Emergency Workers within the 10-mile EPZ. Group dosimetry is accomplished by issuing a PRD to each individual, then using one or more area DRDs to monitor exposure of the entire group.

The Dewitt County EOC plans and procedures, did not allow for the emergency worker real-time access to information concerning gamma exposure.

REFERENCE: NUREG CRITERION K.3.a

EFFECT: Emergency workers who were exposed to radiation would not know their

exposure, after being exposed to gamma radiation.

RECOMMENDATION: Ensure the EOC has plans and procedures which include issuance of PRDs during group dosimetry.

CORRECTIVE ACTION SCHEDULED: Per IEMA - 3.a.1 - dosimetry for DeWitt County EOC staff - the issue is currently being addressed with DeWitt County. Procedures will be revised to issue dosimetry to all EOC personnel.

ISSUE NO.: 13-13-5a1-P-05

CRITERION: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

CONDITION: Dewitt County Plans and the Mutual Aid Agreement between Dewitt County, Clinton Emergency Management Agency, the National Weather Service, Illinois and the radio station state that the message will be read directly on air, while being recorded for future rebroadcasts; however, for the clarity of the message, this does not occur.

POSSIBLE CAUSE: The agreement and the policy may have been written by the state/county, not realizing the actual process that occurs at the radio station.

REFERENCE: NUREG 0654/FEMA REP-1 E.5

EFFECT: Confusion of the process that occurs.

RECOMMENDATION: Update Dewitt County Plan VIII (2A) Page 41, and MOU Attachment B, Page 2 of 2, and MOU Attachment D, Page 1 of 1.

CORRECTIVE ACTION SCHEDULED: Per IEMA - 5.a.1 - radio station MOU -

the radio agreement is currently being revised.

- e. NOT DEMONSTRATED: None
- f. PRIOR ISSUES - RESOLVED: None
- g. PRIOR ISSUES - UNRESOLVED: None

3.3.2.3 Dewitt County - Emergency Operations Center - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.4 Dewitt County - Clinton Police Department - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.5 Dewitt County - Clinton Police Department - Traffic and Access Control Post - Dosimetry Briefing

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

- a. MET: 1.e.1, 3.a.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

3.3.2.6 Dewitt County - EAS WJBC (1230), WBNQ (101.5), WBWN (104.1)

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

- a. MET: 1.d.1, 5.a.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

3.3.2.7 Macon County - Initial Warning Point

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

- a. MET: 1.a.1, 1.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

3.3.2.8 Macon County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.d.1, 3.d.2.
- 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

3.3.2.9 Macon County - Emergency Operations Center - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.10 McLean County - Initial Warning Point

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

- a. MET: 1.a.1, 1.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

3.3.2.11 McLean County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.d.1, 3.d.2.
- 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

3.3.2.12 McLean County - Emergency Operations Center - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

3.3.2.13 Piatt County - Initial Warning Point

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

- a. MET: 1.a.1, 1.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

3.3.2.14 Piatt County - Emergency Operations Center

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

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.d.1, 3.d.2.
- 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

3.3.2.15 Piatt County - Emergency Operations Center - Traffic and Access Control Post

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

- a. MET: 1.d.1, 1.e.1, 3.a.1, 3.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

There was one Deficiency identified during this exercise for DeWitt County. There were no Deficiencies identified for the State of Illinois, Macon, Mclean or Piatt Counties.

The County of DeWitt received a Deficiency finding under Criterion 5.b.1 – Offsite Response Organizations provide accurate subsequent emergency information and instructions to the public and the news media in a timely manner.

The Deficiency resulted from the failure of the DeWitt County Emergency Operations Center (EOC) staff to provide correct emergency information and instructions to the public in a timely manner after the decision was made to evacuate Sub-Area 1. The decision to evacuate Sub-Area 1 was made at 1222 hours, with sirens to alert the public to be activated at 1230 hours. The Emergency Alert System message was not able to be broadcast until 1248 hours. During the 18 minutes between siren activation and the evacuation message broadcast, the previously issued General Information message was being broadcast. This message informed the public that there was an event taking place at the CPS, and that no evacuation was required at the time.

The Deficiency assessed was based on our findings that individual performance, as well as the decision-making process used by the DeWitt County staff to implement protective action decisions, contributed to the general public not being instructed to evacuate until 26 minutes after the decision was made to evacuate the public. During this delay, the public was informed that no evacuation was required. Protective actions were required for the General Emergency Classification Level declared by the utility concurrent with a release of radioactive material. Subsequently, the general public potentially received unnecessary radiological contamination and exposure. More detailed information regarding Criterion 5.b.1 performance is included in the enclosed narratives. The Deficiency was resolved during a re-demonstration exercise conducted with appropriate DeWitt County personnel on June 19, 2013.

There were no Areas Requiring Corrective Action identified for State of Illinois, DeWitt, Macon, Mclean or Piatt Counties.

There was one Plan Issue identified during this exercise for the State of Illinois and three for DeWitt County. There were no Plan Issues identified for Macon, Mclean or Piatt Counties.

The Plan Issue for the State of Illinois was identified under Criterion 5.a.1 – The Offsite Response Organizations provide accurate emergency information and instructions to the public and news media in a timely manner. The Plan Issue was identified in the Illinois Plan for Radiological Accidents, Volume 1, dated 11/07 (IPRA) and the Standard Operating Procedure RTF-PARS-2, entitled KI PARS (SOP), differ in their description of who is given a recommendation to consider taking KI.

The first Plan Issue for DeWitt County was identified under Criterion 1.a.1 - The Offsite Response Organizations use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. The Plan Issue was identified in DeWitt County Initial Warning Point procedure that directs the staff to a step that does not exist within the procedure.

The second Plan Issue for DeWitt County was identified under Criterion 3.a.1 – The Offsite Response Organizations issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plans/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. Appropriate record keeping of the administration of KI for emergency workers is maintained. The Plan Issue was identified in DeWitt County Emergency Operations Center (EOC) based on the Dewitt County EOC is within the 10-mile Emergency Planning Zone and the EOC Dosimetry Control Officer did not conduct radiological briefing and dosimetry was not issued to EOC workers.

The third Plan Issue for DeWitt County was identified under Criterion 5.a.1 - The Offsite Response Organizations provide accurate emergency information and instructions to the public and news media in a timely manner. The Plan Issue was identified in that the Dewitt County Plans and the Mutual Aid Agreement between Dewitt County, Clinton Emergency Management Agency, the National Weather Service, Illinois and the radio station state that the message will be read directly on air, while being recorded for future rebroadcasts; however, for the clarity of the message, this does not occur.

Although all Ingestion Pathway Exercise objectives were met, a training opportunity was identified to further enhance the capabilities of the SIRC Liaisons during an Ingestion Pathway Event. A Training Needs Assessment was conducted to assist in identifying the content of the FEMA observed training session. Successful completion of the training session occurred on

October 2, 2013, with the appropriate agencies.

APPENDIX A: IMPROVEMENT PLAN

Issue Number: 13-13-1a1-P-03		Criterion: 1a1
<p>ISSUE: Clinton Plan VIII (2A) page 81 Step 1 directs the IWP that if EOC is activated "Continue on to number 4" but there is no step 4. This is under IWP actions for notification of an Emergency Classification Level of Site Area Emergency.</p>		
<p>RECOMMENDATION: Correct step numbering or determine if step 4 was inadvertently deleted.</p>		
<p>CORRECTED ACTION DEMONSTRATED: Reported by IEMA - 1.a.1 - missing step #4 - correction has already been completed.</p>		
<p>CORRECTIVE ACTION DESCRIPTION: Reported by IEMA - 1.a.1 - missing step #4 - correction has already been completed.</p>		
<p>CAPABILITY: Emergency Operations Center Management</p>	<p>PRIMARY RESPONSIBLE AGENCY: IEMA</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE:</p>	
<p>AGENCY POC: William Conway</p>	<p>ESTIMATED COMPLETION DATE: 2013-09-30</p>	

Issue Number: 13-13-3a1-P-04		Criterion: 3a1
<p>ISSUE: The DeWitt County EOC is within the 10 mile EPZ and the EOC DCO did not conduct radiological briefing and dosimetry was not issued to EOC workers. The plans/procedures did not identify that dosimetry, including DRDs and PRDs, were to be issued to emergency workers.</p>		
<p>The plans/procedures should describe the capabilities to provide DRDs/LDs to emergency workers who could be exposed to ionizing radiation.</p>		
<p>Those individuals assigned to the EOC which is within the 10-mile Emergency Planning Zone (EPZ) are required to have an LD. Group dosimetry for these emergency workers is permitted as long as the individuals remain working in the same area. Group dosimetry is accomplished by issuing a LD to each individual, then using one or more area DRDs to monitor exposure of the entire group.</p>		
<p>RECOMMENDATION: Ensure the EOC has plans and procedures which include issuance of PRDs during group dosimetry.</p>		
<p>CORRECTIVE ACTION SCHEDULED: Per IEMA - 3.a.1 - dosimetry for DeWitt County EOC staff - the issue is currently being addressed with DeWitt County. Procedures will be revised to issue dosimetry to all EOC personnel.</p>		
<p>CORRECTIVE ACTION DESCRIPTION: Per IEMA - 3.a.1 - dosimetry for DeWitt County EOC staff - the issue is currently being addressed with DeWitt County. Procedures will be revised to issue dosimetry to all EOC personnel.</p>		
<p>CAPABILITY: Emergency Operations Center Management</p>	<p>PRIMARY RESPONSIBLE AGENCY: IEMA</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE:</p>	
<p>AGENCY POC: William Conway</p>	<p>ESTIMATED COMPLETION DATE: 2013-12-15</p>	

Issue Number: 13-13-5a1-P-05		Criterion: 5a1
<p>ISSUE: Dewitt County Plans and the Mutual Aid Agreement between Dewitt County, Clinton Emergency Management Agency, the National Weather Service, Illinois and the radio station state that the message will be read directly on air, while being recorded for future rebroadcasts; however, for the clarity of the message, this does not occur.</p>		
<p>RECOMMENDATION: Update Dewitt County Plan VIII (2A) Page 41, and MOU Attachment B, Page 2 of 2, and MOU Attachment D, Page 1 of 1.</p>		
<p>CORRECTIVE ACTION SCHEDULED: Per IEMA - 5.a.1 - radio station MOU - the radio agreement is currently being revised.</p>		
<p>CORRECTIVE ACTION DESCRIPTION: Per IEMA - 5.a.1 - radio station MOU - the radio agreement is currently being revised.</p>		
<p>CAPABILITY: Emergency Public Information and Warning</p>	<p>PRIMARY RESPONSIBLE AGENCY: IEMA</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE:</p>	
<p>AGENCY POC: William Conway</p>	<p>ESTIMATED COMPLETION DATE: 2013-12-15</p>	

Issue Number: 13-13-5b1-P-01		Criterion: 5b1
<p>ISSUE: The Illinois Plan for Radiological Accidents, Volume 1, dated 11/07 (IPRA) and the Standard Operating Procedure RTF-PARS-2, entitled KI PARS (SOP), differ in their description of who is given a recommendation to consider taking KI. The IPRA states at I(1), pg. 14, that immobile populations, emergency workers and the general population who possess KI need to make the decision whether to ingest it. However, the SOP in paragraphs 3.1, 3.2, and 4.4(B) mentions immobile populations and emergency workers but does not mention the general public.</p>		
<p>RECOMMENDATION: Revise the SOP with language that matches the wording in the IPRA to include mention of the general public in addition to immobile populations and emergency workers.</p>		
<p>CORRECTIVE ACTION SCHEDULED: Per IEMA - IPRA Volume 1 language is currently being revised in IPRA Volume 1 and SOPs to more accurately reflect the State's new KI program for the general public.</p>		
<p>CORRECTIVE ACTION DESCRIPTION: Per IEMA - 5.b.1 - IPRA Volume 1 language is currently being revised in IPRA Volume 1 and SOPs to more accurately reflect the State's new KI program for the general public.</p>		
<p>CAPABILITY: Emergency Public Information and Warning</p>	<p>PRIMARY RESPONSIBLE AGENCY: IEMA</p>	
<p>CAPABILITY ELEMENT: Planning</p>	<p>START DATE:</p>	
<p>AGENCY POC: William Conway</p>	<p>ESTIMATED COMPLETION DATE: 2013-12-15</p>	

APPENDIX B: EXERCISE TIMELINE

Table 1 - Exercise Timeline
DATE: 2013-03-26, SITE: Clinton Power Station, IL

Emergency Classification Level or Event	Time Utility Declared	IL - SIRC	IL - REAC	IL - UAC	DEW - EOC	MAC - EOC	MCL - EOC
Unusual Event	0850	0903	0909	NA	NA	NA	NA
Alert	0857	0912	0918	0940	0922	0937	0944
Site Area Emergency	1032	1042	1039	1051	1055	1107	1109
General Emergency	1151	1200	1157	1208	1210	1220	1224
Simulated Rad. Release Started	1151	1200	1157	1208	1210	1220	1224
Simulated Rad. Release Terminated	NA	NA	NA	NA	NA	NA	NA
Facility Declared Operational		0930	0937	0930	1030	1004	1020
Declaration of State or Local of Emergency		1234	NA	NA	1310	1251	NA
Exercise Terminated		1330	1330	1338	1347	1338	1345
Early Precautionary Actions: State issued an order to restrict access to state parks and hunting areas		1121	NA	NA	NA	NA	NA
Early Precautionary Actions: State issued Livestock Advisory		1121	NA	NA	NA	NA	NA
Early Precautionary Actions: State issued water restrictions within 10 miles of CPS		1113	NA	NA	NA	NA	NA
Precautionary Actions: State issued rail traffic restrictions within 10 miles of CPS		1205	NA	NA	NA	NA	NA
Precautionary Actions: State issued air restrictions within 10 miles of CPS		1225	NA	NA	NA	NA	NA
General Information Message: Public advised of incident at CPS		0940	NA	NA	1115	NA	NA
1st Siren Activation		NA	NA	NA	1120	NA	NA
1st EAS or EBS Message		NA	NA	NA	1126	NA	NA
Protective Action Recommendation: State recommended evacuation of Sub-Area 1		1208	1208	NA	NA	NA	NA
Protective Action Decision: DeWitt County directed evacuation of Sub-Area 1		NA	NA	NA	1222	NA	NA
2nd Siren Activation		NA	NA	NA	1230	NA	NA
PAD EAS or EBS Message		NA	NA	NA	1248	NA	NA
KI Administration Decision: KI administered to Emergency Workers and immobile populations		1208	1208	1215	1214	1235	1230

Table 1 - Exercise Timeline
DATE: 2013-03-26, SITE: Clinton Power
Station, IL

Emergency Classification Level or Event	Time Utility Declared	PIA - EOC
Unusual Event	0850	NA
Alert	0857	0936
Site Area Emergency	1032	1127
General Emergency	1151	1222
Simulated Rad. Release Started	1151	1222
Simulated Rad. Release Terminated	NA	NA
Facility Declared Operational		1027
Declaration of State or Local of Emergency		NA
Exercise Terminated		1348
Early Precautionary Actions: State issued an order to restrict access to state parks and hunting areas		NA
Early Precautionary Actions: State issued Livestock Advisory		NA
Early Precautionary Actions: State issued water restrictions within 10 miles of CPS		NA
Precautionary Actions: State issued rail traffic restrictions within 10 miles of CPS		NA
Precautionary Actions: State issued air restrictions within 10 miles of CPS		NA
General Information Message: Public advised of incident at CPS		NA
1st Siren Activation		NA
1st EAS or EBS Message		NA
Protective Action Recommendation: State recommended evacuation of Sub-Area 1		NA
Protective Action Decision: DeWitt County directed evacuation of Sub-Area 1		NA
2nd Siren Activation		NA
PAD EAS or EBS Message		NA
KI Administration Decision: KI administered to Emergency Workers and immobile populations		1222

APPENDIX C: EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel that evaluated the Clinton Power Station REP Full Participation Plume and Ingestion Exposure Pathway Exercises on March 26 and 27, 2013. The list includes the evaluation team leadership and all evaluators. The organization each evaluator represents is indicated by the following abbreviations:

DHS/FEMA Dept of Homeland Security/Federal Emergency Management Agency

ICF Consulting

Title	Name	Organization
Radiological Assistance Committee, Chairman	William E. King	DHS/FEMA
Exercise Director	Dwaine Warren	DHS/FEMA
Alternate Exercise Director	Stephen Tulley	DHS/FEMA
Site Specialist	Todd M. Gemske	DHS/FEMA
Team Leader - Illinois	Dan Kanakares	DHS/FEMA
Team Leader – DeWitt County	Ed Golinski	DHS/FEMA
Team Leader – Macon County	Carolyn Sturghill	DHS/FEMA
Team Leader – McLean County	Karl Rabenhorst	DHS/FEMA
Team Leader – Piatt County	James King	DHS/FEMA

DATE: 2013-03-26, SITE: Clinton Power Station, IL

LOCATION	EVALUATOR	AGENCY
State of Illinois - Initial Warning Point	Meg Swearingen	ICFI
State of Illinois - State of Illinois Response Center	Gary Bolender Meg Swearingen Robert Walker	ICFI ICFI ICFI
State of Illinois - Public Inquiry Phone Bank	Robert Walker	ICFI
State of Illinois - Radiological Emergency Assessment Center	Todd Gemske Michael Howe Dennis Wilford	FEMA RV FEMA HQ ICFI
State of Illinois - Unified Area Command	Gary Bolender Don Daniel	ICFI FEMA Region V
State of Illinois - Radiological Assessment Field Team	Kent Tosch Dennis Wilford	ICFI ICFI
State of Illinois - Mobile Laboratory	Thomas Essig	ICFI
State of Illinois - Field Monitoring Team - 1	Jill Leatherman	ICFI
State of Illinois - Field Monitoring Team - 2	Cheryl Weaver	ICFI
State of Illinois - Dewitt County Emergency Operations Center - Illinois State Radiological Advisor	Henry Christiansen	ICFI
State of Illinois - Dewitt County Emergency Operations Center - Illinois State Liaison	Henry Christiansen	ICFI
State of Illinois - Macon County Emergency Operations Center - Illinois State Liaison	Danny Loomis	ICFI
State of Illinois - McLean County Emergency Operations Center - Illinois State Liaison	Clark Duffy	ICFI
State of Illinois - Piatt County Emergency Operations Center - Illinois State Liaison	Clinton Crackel	FEMA RV
State of Illinois - Illinois State Police District 6 Headquarters - Dosimetry Control Officer Briefing	Gary Bolender	ICFI
State of Illinois - Illinois State Police District 6 Headquarters - Traffic and Access Control Post	Bridget Ahlgrim	FEMA HQ
State of Illinois - St. Mary's Hospital - Medical Service - Facility	Carl Bebrich	FEMA RV
State of Illinois - Stephen Decatur School - Evacuee Emergency Worker Monitoring and Decontamination of Equipment	Delwyn Kinsley	FEMA RV
State of Illinois - Stephen Decatur School - Evacuee/Emergency Worker Monitoring	Delwyn Kinsley	FEMA RV
State of Illinois - Stephen Decatur School - Evacuee/Emergency Worker Decontamination	Delwyn Kinsley	FEMA RV
State of Illinois - Stephen Decatur School - Evacuee Registration	Carl Bebrich	FEMA RV
State of Illinois - Stephen Decatur School - Congregate Care Center	Carl Bebrich Todd Gemske	FEMA RV FEMA RV
State of Illinois - Decatur Ambulance - Medical Service - Transportation	Delwyn Kinsley	FEMA RV
Dewitt County - Initial Warning Point	Bridget Ahlgrim	FEMA HQ
Dewitt County - Emergency Operations Center	Marcy Campbell Henry Christiansen Janet Hlavaty-LaPosa Jesse King	ICFI ICFI FEMA RX FEMA REPP
Dewitt County - Emergency Operations Center - Traffic and Access Control Post	Marcy Campbell	ICFI

Unclassified
Radiological Emergency Preparedness Program (REP)

After Action Report/Improvement Plan

Clinton Power Station

Dewitt County - Clinton Police Department - Traffic and Access Control Post	Henry Christiansen	ICFI
Dewitt County - Clinton Police Department - Traffic and Access Control Post - Dosimetry Briefing	Meg Swearingen	ICFI
Dewitt County - EAS WJBC (1230), WBNQ (101.5), WBWN (104.1)	Bridget Ahlgrim	FEMA HQ
Macon County - Initial Warning Point	Danny Loomis	ICFI
Macon County - Emergency Operations Center	Danny Loomis *Carolyn Sturghill	ICFI FEMA RV
Macon County - Emergency Operations Center - Traffic and Access Control Post	Danny Loomis	ICFI
McLean County - Initial Warning Point	Clark Duffy	ICFI
McLean County - Emergency Operations Center	Clark Duffy *Karl Rabenhorst	ICFI FEMA RV
McLean County - Emergency Operations Center - Traffic and Access Control Post	Clark Duffy	ICFI
Piatt County - Initial Warning Point	Clinton Crackel	FEMA RV
Piatt County - Emergency Operations Center	Clinton Crackel *James King	FEMA RV FEMA RV
Piatt County - Emergency Operations Center - Traffic and Access Control Post	Clinton Crackel	FEMA RV
* Team Leader		

APPENDIX D: ACRONYMS AND ABBREVIATIONS

Acronym	Meaning
AAR	After Action Report
ALS	Advanced Life Support
ARC	American Red Cross
CC	Contamination Control
CCC	Congregate Care Center
CCS	Contamination Control Supervisor
CEDE	Combined Effective Dose Equivalent
CEO	County Elected Official
CERT	Community Emergency Response Team
CIT	Critical Incident Team
CPD	Clinton Police Department
CPIO	County Public Information Officer
CPS	Clinton Power Station
CST	Civil Support Team
DAS	Decatur Ambulance Service
DCL	Dosimetry Control Log
DCO	Dosimetry Control Officer
DRD	Direct Reading Dosimeter
EAS	Emergency Alert System
ECL	Emergency Classification Level
ED	Emergency Department
EMA	Emergency Management Agency
EMAC	Emergency Management Agency Coordinator
EMC	Emergency Management Coordinator
EMD	Emergency Management Director
EMS	Emergency Medical Service
EMT	Emergency Medical Technician
EOC	Emergency Operation Center
EOF	Emergency Operations Facility
EPZ	Emergency Planning Zone
ERT	Emergency Response Telecommunicator
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
GE	General Emergency

GIS	Geographical Information System
GM	Geiger- Mueller
HP	Health Physics
IAP	Incident Action Plan
IC	Incident Commander
ICS	Incident Command System
IEMA	Illinois Emergency Management Agency
ILEAS	Illinois Law Enforcement Alarm System
IP	Improvement Plan
ISP	Illinois State Police
IWIN	Illinois Wireless Information Network
IWP	Initial Warning Point
JIC	Joint Information Center
LD	Luminescent Dosimeter
LEADS	Law Enforcement Agency Data System
LEC	Law Enforcement Center
LSC	Liquid Scintillation Counter
MRT	Medical Radiation Technician
NARS	Nuclear Accident Reporting System
NIMS	National Incident Management System
NRC	Nuclear Regulatory Commission
ORO	Offsite Response Organizations
OSL	Optically Stimulated Luminescence
PAD	Protective Action Decision
PAR	Protective Action Recommendations
PC	Piatt County
PDP	Personal Dosimetry Packet
PIO	Public Information Officer
PPE	Personal Protective Equipment
PRD	Permanent Record Dosimeter
PSAP	Public Safety Answering Point
RA	Radiological Advisor
RAC	Regional Assistance Committee
RAFT	Radiological Assessment Field Team
RC	Reception Center
RCS	Reactor Coolant System
RCW	Registration Case Worker
RD	Radio Dispatch
RDO	Radiological Duty Officer
REA	Radiation Emergency Area

REAC	Radiological Emergency Assistance Center
REP	Radiological Emergency Preparedness
RFT	Radiological Field Team
RRC	Radiological Response Chief
RSM	Registration Station Manager
RT	Radiation Technologist
RTF	Radiological Task Force
SAE	Site Area Emergency
SAM	Staging Area Manager
SEOC	State Emergency Operations Center
SIRC	State Incident Response Center
SOP	Standard Operating Procedure
TEDE	Total Effective Dose Equivalent
UAC	Unified Area Command
UE	Unusual Event
URI	Unified RASCAL Interface

APPENDIX E: EXERCISE PLAN

This appendix lists the exercise criteria, which were scheduled for demonstration in the Clinton Power Station Radiological Emergency Preparedness Full Participation Plume Exposure and Ingestion Pathway Exercise on March 26 and 27, 2013, and the offsite Extent-of-Play agreement accepted by DHS/FEMA Region V on February 25, 2013. The exercise criteria, contained in the FEMA Radiological Emergency Preparedness (REP) Program Manual (April 2012), represent a functional translation of the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Rev1, "Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," November 1980. Because the exercise criteria are intended for use at all nuclear power plant sites, and because of variations among offsite plans and procedures, an Extent-of-Play agreement is prepared by the State and accepted by DHS/FEMA to provide evaluators with guidance on expected actual demonstration of the criteria.

Exercise Criteria

Listed on the following pages are the specific radiological emergency preparedness criteria that were scheduled for demonstration during this exercise.

State of Illinois Extent-of-Play Agreement

Criteria that can be re-demonstrated immediately for credit, at the discretion of the evaluator, include the following: 3.a.1, 3.d.1, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 - EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

The State Emergency Operations Center (SEOC), which houses the IEMA Communications Center (Initial Warning Point), the State of Illinois Response Center (SIRC) and the Radiological Emergency Assessment Center (REAC), will be activated. The IEMA Emergency Response Telecommunicator will implement procedures for notification of IEMA staff as defined in IEMA SOPs. The SIRC will be fully activated with a variety of State agencies and personnel. REAC will be fully activated. Rosters will be provided to demonstrate 24-hour staffing of the SIRC and REAC. The roster will be available for review; however, it will not be removed from the EOC.

The Unified Area Command (UAC) will be activated with State district and regional personnel at the Central Illinois Regional Airport in Bloomington on Day 1. IEMA personnel will be prepositioned in the local area and dispatched to the County EOCs, UAC, EOF, Technical Support Center (TSC) and the JIC. FEMA will not evaluate the TSC. A rumor control phone bank for public inquiries will be operated by the State during the exercise in a room adjacent to the SIRC.

An actual phone call will be made to the FEMA duty officer advising them of the situation at Clinton Station. Follow up calls to FEMA will be simulated.

The prepositioned State staff will begin exercise play no earlier than the Alert.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

This criterion will not be demonstrated during this exercise.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

The ability to direct and control emergency response activities will be demonstrated at the SIRC, REAC, RAFT, the UAC and the JIC. Coordination will be demonstrated between the SIRC, the REAC, RAFT, the UAC, the JIC, the EOF and the county EOCs.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.

IEMA will use a variety of communication systems [Nuclear Accident Reporting System (NARS), telefax, commercial telephone, cellular phone, radio] to communicate with other organizations and locations.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

The State of Illinois will demonstrate the use of equipment, maps and displays to support emergency operations. Dosimetry Control Officer (DCO) logs will be available in each County EOC.

A DCO briefing/Traffic and Access Control (TAC) interview will be conducted by the Illinois State Police on March 25, 10:30 a.m., at the ISP District 6 Headquarters in Pontiac. During this event, the availability of dosimetry will be demonstrated.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.

The ability to make the decision to recommend the use of KI to emergency workers will be demonstrated in REAC on Day 1.

A message will be injected to the IEMA Radiological Advisor in the DeWitt County EOC to drive the decision to authorize exposure in excess of administrative limits.

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

The REAC will evaluate the licensee information and complete independent dose projections based on that information and simulated field monitoring data. REAC will make an evaluation of the data and make a protective action recommendation to the SIRC on Day 1.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

The coordination to determine protective action recommendations (PARs) based upon available shelters, evacuation time estimates and other relevant factors will be demonstrated between the SIRC and REAC on Day 1. The State PAR will be transmitted to the DeWitt County EOC via NARS.

The capability to determine which centers should be activated for monitoring, decontamination, registration reception and congregate care will be demonstrated at UAC, with input from the SIRC and REAC on Day 1.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

The coordination to determine protective action recommendations (PARs) based upon available shelters, evacuation time estimates and other relevant factors will be demonstrated between the SIRC and REAC on Day 1. The State PAR will be transmitted to the DeWitt County EOC via NARS.

The ability to make the decision to recommend the use of KI to institutionalized persons will be demonstrated in REAC.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria.

The ability to assess radiological consequences will be demonstrated during the post-emergency phase of the exercise on Day 2. Field measurements simulated to come from the field team staging area will be supplied to the decision makers for purposes of this demonstration.

Criterion 2.e.1: Timely post-plume phase re-location, re-entry and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the OROs plan and/or procedures.

This criterion will be discussed in the State EOC (SIRC and REAC) during the post-emergency phase on Day 2.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

This will be demonstrated during the ISP DCO briefing/TAC interview on March 25, 10:30 a.m., at the ISP District 6 Headquarters in Pontiac. This criterion will also be demonstrated at the field team staging area.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals is maintained.

The State of Illinois does not **currently** recommend the use of KI by the general public. However the State will address the general public who has KI regarding the proper time to consider taking KI through the JIC.

Criterion 3.c.1: Protective action decisions are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

This criterion does not apply to the State of Illinois.

Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools.

This criterion does not apply to the State of Illinois.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

This will be demonstrated by the State through coordination between the UAC and the County EOCs, in accordance with the Clinton Station EPZ Traffic and Access Control procedures. The staffing of the State posts will be simulated during the exercise.

A TAC interview will be conducted during the ISP DCO briefing/TAC interview on March 25, 10:30 a.m., at the ISP District 6 Headquarters in Pontiac.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

This will be demonstrated through discussions at the UAC between the Illinois State Police and Illinois Department of Transportation. A message will be injected at the UAC that will drive this demonstration. State personnel will deal with the impediment by discussing the need for equipment, and its estimated time of arrival, etc. Actual contacts with resource providers will be made and logged.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.

This criterion will be demonstrated in the State EOC (SIRC and REAC) during the post-emergency phase on Day 2.

Criterion 3.e.2: Appropriate measures, strategies and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk and agricultural production.

This criterion will be demonstrated in the State EOC (SIRC and REAC) during the post-emergency phase on Day 2. A camera-ready booklet will be available and procedures for distribution will be discussed.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public during the post-emergency phase are coordinated with appropriate organizations and implemented.

This criterion will be discussed in the State EOC (SIRC and REAC) during the post-emergency phase on Day 2.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

Criterion 4.a.1: [RESERVED]

Criterion 4.a.2: Field teams (two or more) are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

This criterion will be demonstrated during this exercise at RAFT on Day 1. Command and control of RAFT will be demonstrated during the exercise.

Criterion 4.a.3: Ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Teams will move to an appropriate low background location to determine whether any significant (as specified in the plan and/or procedures) amount of radioactivity has been collected on the sampling media.

This criterion will be demonstrated by the field teams and information will be coordinated with RAFT Command. Two field teams will be evaluated. Each team will take an air sample with particulate filters. This criterion may be demonstrated at the staging area or other location out of sequence to allow for timely exercise play.

Criterion 4.b.1: The field teams demonstrate the capability to make appropriate measurements and to collect samples (e.g., food crops, milk, water, vegetation, and soil) to support adequate assessments and protective action decision-making.

This criterion will be demonstrated on Day 2 by the field teams. Samples appropriate to the area and season will be collected and transported in accordance with SOPs. Two field teams will be evaluated. Other State agency staff will be integrated with the IEMA personnel on the field teams.

Criterion 4.c.1: The laboratory is capable of performing required radiological analyses to support protective action decisions.

This criterion will be demonstrated by the IEMA Mobile Laboratory at the RAFT staging area on Day 1 and Day 2. Pre-packaged samples appropriate to the area, season and scenario will be provided to the lab, prepared and analyzed in accordance with SOPs.

EVALUATION AREA 5 - EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

The State's role in demonstrating this criterion is limited to transmitting the State's protective action recommendation (PAR) to the counties and monitoring the instructional messages provided to the public by the counties. This monitoring will be accomplished by IEMA representatives in the DeWitt County EOC.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system.

This criterion does not apply to the State of Illinois.

Criterion 5.a.4: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

This criterion does not apply to the State of Illinois.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

This will be demonstrated at the JIC on Day 1 in coordination with the SIRC, REAC, UAC, and the DeWitt County EOC. IEMA personnel will be present at the JIC to coordinate with the Exelon staff. Media briefings will be conducted at the JIC. A livestock advisory will be issued to the media from the JIC or the SIRC when appropriate.

A rumor control phone bank for public inquiries will be operated by the State during the exercise in the SIRC or in a room adjacent to the SIRC on Day 1.

EVALUATION AREA 6 - SUPPORT OPERATION/FACILITIES

Criterion 6.a.1: The reception center facility has appropriate space, adequate resources, and trained personnel to provide monitoring, decontamination, and registration of evacuees.

This criterion will be demonstrated at the Stephen Decatur School building on Thursday, March 21st, with set up beginning at 9:30 a.m. and demonstration beginning approximately 10:30 a.m. Two portal monitors will be set up during the demonstration. Evacuee monitoring and decontamination will be demonstrated. The appropriate number of evacuees will be processed to meet 20% in 12 hours requirement.

Due to questions of legality, the impounding/confiscating of contaminated vehicles will not be demonstrated.

Criterion 6.b.1: The facility/ORO has adequate procedures and resources for the accomplishment of monitoring and decontamination of emergency workers and their equipment and vehicles.

This criterion will be demonstrated at RAFT on Day 1. A portal monitor will be set up during the demonstration. At least two emergency workers will be monitored at RAFT. An emergency worker vehicle will be monitored. Decontamination of that vehicle will be simulated via an interview.

Criterion 6.c.1: Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with planning guidelines. Managers demonstrate the procedures to assure that evacuees have been monitored for contamination and have been decontaminated as appropriate prior to entering congregate care facilities.

This criterion will be demonstrated at the Stephen Decatur School building on March 21st, with set up beginning at 9:30 a.m and demonstration beginning approximately 10:30 a.m. Local organizations responsible for operating a reception and congregate care center will be present to demonstrate this criterion.

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.

This criterion will be demonstrated during an out of sequence drill conducted at St. Mary's Hospital in Decatur on March 20th, 10:00 a.m.

DeWitt County Extent-of-Play Agreement

Criteria that can be re-demonstrated immediately for credit, at the discretion of the evaluator, include the following: 3.a.1, 3.d.1, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 - EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: Offsite Response Organizations (OROs) use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

DeWitt County intends to fully activate the Emergency Operations Center (EOC) in Clinton, Illinois. The County will implement notification procedures as defined in IPRA-Clinton. Representatives from the EPZ municipalities, IEMA, ISP and Exelon will staff the County EOC but will not be pre-positioned in the EOC. A roster will be provided to demonstrate a 24-hour staffing of the EOC. Evaluators will not be allowed to remove the roster from the EOC.

An evaluator will be positioned at the County Sheriff's Communications Center (initial warning point) at the start of the exercise.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

This criterion will not be demonstrated during this exercise.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

Decision making will be demonstrated at the DeWitt County EOC. Coordination of decisions and emergency activities will be demonstrated between DeWitt County, the SIRC, UAC and the JIC, and between the County and municipalities within the EPZ. Coordination between DeWitt County and the support counties will be demonstrated.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.

DeWitt County will use NARS, commercial telephone, radio and telefax to communicate with departments, organizations and agencies at other locations.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

DeWitt County will demonstrate the ability to support operations through the use of maps, status boards and other displays as appropriate. DCO logs will be available from the IEMA Radiological Advisor in the DeWitt County EOC. The availability of dosimetry and KI will be demonstrated during the traffic and access control demonstration. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the DeWitt County EOC.

The DCO briefing for the Clinton Police officer demonstrating traffic and access control will be conducted at the Clinton Police Department on March 25, at 11:00 am.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.

This criterion does not apply to DeWitt County.

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

This criterion does not apply to DeWitt County.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

The State of Illinois will make protective action recommendations to DeWitt County officials in the County EOC. The DeWitt County officials will make the final decision regarding what protective actions will be recommended to the public.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

The State of Illinois will make protective action recommendations to DeWitt County officials in the County EOC. The DeWitt County officials will make the final decision regarding what protective actions will be recommended for groups of people with disabilities and those with access/functional needs.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO's planning criteria.

This criterion does not apply to DeWitt County.

Criterion 2.e.1: Timely post-plume phase re-location, re-entry and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the OROs plan and/or procedures.

This criterion was successfully demonstrated in 2011 and will not be evaluated during this exercise, but the county may participate in this criterion to the extent necessary to support state and federal participation.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

DeWitt County will demonstrate this criterion by close coordination with the IEMA Radiological Advisor and timely dissemination and exchange of information within the County Dosimetry Control Officer network. Exercise messages will be injected which will ensure the opportunity to demonstrate this criterion in the County EOC.

This criterion will also be demonstrated during the sheriff's & Clinton PD traffic and access control demonstrations. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the DeWitt County EOC. The DCO briefing for the Clinton Police officer demonstrating traffic and access control will be conducted at the Clinton Police Department on March 25, at 11:00 am.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals is maintained.

When notified by the State of Illinois to distribute and administer KI, DeWitt County officials will discuss the issuance of KI and immobile populations, as a voluntary measure, and will notify the municipalities of the State's recommendation.

The State of Illinois will make an announcement through the JIC of the appropriate time for the public to consider voluntarily taking KI.

Criterion 3.c.1: Protective action decisions are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

This will be demonstrated by DeWitt County through the simulated implementation of the appropriate procedures. The appropriate officials will coordinate transportation and receiving facilities for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions. One of each type of special facility will be contacted during the exercise. One of each type of transportation provider (ambulance/bus) will be contacted during the exercise. The public will not be involved in the demonstration.

The Mobility Impaired List/Cards will be available for inspection in the County EOC during the exercise. The evaluator will not be allowed to remove the list/cards from the EOC.

Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools.

DeWitt County officials will demonstrate this capability through the simulated implementation of the appropriate procedures in the County EOC. The EPZ schools and transportation providers will be contacted during the exercise.

School interviews will not be conducted as all EPZ schools have been successfully evaluated in the last 4 years.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Coordination between DeWitt County agencies designated to provide traffic and access control will be exhibited during the exercise in the County EOC by the DeWitt County Sheriff's Department and at a separate TAC/DCO demonstration by the Clinton Police Department on March 25th at 11:00 am.

A Sheriff's deputy will be available during the exercise to demonstrate the staffing of one post. The post for the demonstration will be selected by DeWitt County during the exercise based on exercise play. The deputy may be asked to drive to the selected post location for the demonstration; however, this may be simulated at the discretion of the evaluator. If asked to drive to a post, the sheriff's department can choose the post that will require the least amount of time to reach. The staffing of the remaining posts will be simulated.

A TAC/DCO Demonstration will take place at the Clinton Police Department on March 25th at 11:00 am. An officer may be asked to drive to the selected post, however this may be simulated at the discretion of the evaluator.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

The DeWitt County EOC staff will demonstrate the capability to identify and take appropriate actions concerning impediments to evacuation. A message will be injected by the Controller that will drive this demonstration. County personnel will deal with the impediment by identifying the equipment needed, discussing its estimated time of arrival, etc. Actual contacts with resource providers will be made and logged.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.

This criterion does not apply to DeWitt County.

Criterion 3.e.2: Appropriate measures, strategies and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk and agricultural production.

This criterion does not apply to DeWitt County.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public during the post-emergency phase are coordinated with appropriate organizations and implemented.

This criterion was successfully demonstrated in 2011 and will not be evaluated during this exercise, but the county may participate in this criterion to the extent necessary to support state and federal participation.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

This evaluation area does not apply to DeWitt County.

EVALUATION AREA 5 - EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

DeWitt County will demonstrate the capability to provide both an alert signal and an initial instructional message to populated areas throughout the 10-mile plume pathway EPZ in a timely manner after their decision to activate the alert and notification system to implement protective action recommendations (PAR).

This capability will be demonstrated through the simulated activation of the Clinton Station EPZ Prompt Notification System as defined in IPRA-Clinton. The Prompt Notification System (outdoor warning sirens) will not be activated during the exercise.

The ability to provide instructions to the public will be demonstrated through the simulated activation of the local radio station. The local radio station (WBNQ/WBWN/WJBC) will be contacted during the first, and possibly the second, alert and notification sequence. An evaluator and a controller will be positioned at

the radio station during the exercise to monitor the initial alert and notification sequence message. An evaluator and controller will be positioned at the radio station during the exercise to monitor for a message containing a PAR.

The IEMA Controller will terminate the demonstration if the demonstration interferes with the radio station's daily operations.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system.

This criteria will not be demonstrated in this exercise by DeWitt County.

Criterion 5.a.4: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

This criteria does not apply to DeWitt County.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

DeWitt County will demonstrate this criterion by using pre-scripted messages as indicated in IPRA-Clinton. Contact with the radio station will be simulated for each alert and notification sequence following the sequence issuing the initial PAR.

The ability to provide information to the media will be demonstrated by DeWitt County through briefings held at the DeWitt County media briefing location. If real media are not present for the briefings, the controller and observers will serve as mock media. Evaluators will not serve as mock media.

The ability to deal with rumors will be demonstrated by DeWitt County through coordination between the County EOC and the JIC. The DeWitt County EOC controller will inject exercise messages that will ensure the opportunity to demonstrate this criterion. County officials will investigate and address "rumors." If appropriate, the "rumors" will be coordinated between State and County officials in the County EOC and the JIC.

County emergency broadcast messages and news releases, if issued, will be faxed to the JIC.

EVALUATION AREA 6 - SUPPORT OPERATION/FACILITIES

This evaluation area does not apply to DeWitt County.

Macon County Extent-of-Play Agreement

Criteria that can be re-demonstrated immediately for credit, at the discretion of the evaluator, include the following: 3.a.1, 3.d.1, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 - EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Macon County intends to activate the Emergency Operations Center (EOC) in Decatur, Illinois, to the appropriate level. The County will implement notification procedures as defined in IPRA-Clinton. The EOC will be staffed with representatives from the County Board, EMA, and the Sheriff's Department. If the scenario does not drive protective actions in Macon County, the County may decide to down staff the EOC to minimum staffing. A roster will be provided to demonstrate 24-hour County staffing of the EOC. Evaluators will not be allowed to remove the roster from the EOC.

An evaluator will be positioned at the County Sheriff's Communications Center (initial warning point) at the start of the exercise.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

This criterion will not be demonstrated during this exercise.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

Coordination of decisions and emergency activities will be demonstrated between Macon County and DeWitt County.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.

Macon County will use commercial telephone, radio and telefax to communicate with departments and agencies at other locations.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Macon County will adequately demonstrate the ability to support operations through the use of maps, status boards and other displays as appropriate. The availability of dosimetry and KI will be demonstrated during the traffic and access control demonstration. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.

This criterion does not apply to Macon County.

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

This criterion does not apply to Macon County.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

This criterion does not apply to Macon County.

Criterion 2.e.1: Timely post-plume phase re-location, re-entry and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the OROs plan and/or procedures.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

Macon County will demonstrate this criterion by close coordination with IEMA and timely dissemination and exchange of information within the County Dosimetry Control Officer network.

This criterion will also be demonstrated during the traffic and access control demonstration. The Sheriff's deputy will obtain dosimetry from the DCO in the County EOC. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals is maintained.

DeWitt County, as the primary county is responsible for coordination of KI to immobile populations. The State of Illinois will make an announcement through the JIC of the appropriate time for the public to consider voluntarily taking KI. Macon County is not responsible for either function.

Criterion 3.c.1: Protective action decisions are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools.

This criterion does not apply to Macon County.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Coordination between Macon County and DeWitt County will be demonstrated. The Sheriff's Deputy will be available to staff one post. The post for the demonstration will be selected by Macon County during the exercise based on exercise play if the scenario causes Macon County to staff posts. If it does not, the post will be selected by the evaluator.

The deputy may be asked to drive to the selected post location for the demonstration; however, this may be simulated at the discretion of the evaluator. If asked to drive to a post, the sheriff's department can choose the post that will require the least amount of time to reach. The staffing of the remaining posts will be simulated.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

The Macon County EOC staff will demonstrate the capability to identify and take appropriate actions concerning impediments to evacuation. A message will be injected by the Controller that will drive this demonstration. County personnel will deal with the impediment by identifying the equipment needed, discussing its estimated time of arrival, etc. Actual contacts with resource providers will be made and logged.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.

This criterion does not apply to Macon County.

Criterion 3.e.2: Appropriate measures, strategies and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk and agricultural production.

This criterion does not apply to Macon County.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public during the post-emergency phase are coordinated with appropriate organizations and implemented.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

This evaluation area does not apply to Macon County.

EVALUATION AREA 5 - EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system.

This criterion does not apply to Macon County.

Criterion 5.a.4: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

This criteria does not apply to Macon County

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

This criterion does not apply to Macon County. This function is the responsibility of DeWitt County.

EVALUATION AREA 6 - SUPPORT OPERATION/FACILITIES

This evaluation area does not apply to Macon County.

McLean County Extent-of-Play Agreement

Criteria that can be re-demonstrated immediately for credit, at the discretion of the evaluator, include the following: 3.a.1, 3.d.1, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 - EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

McLean County intends to activate the Emergency Operations Center (EOC) in Bloomington, Illinois, to the appropriate level. The County will implement notification procedures as defined in IPRA-Clinton. The EOC will be staffed with representatives from the County Administrator's Office, EMA, and the Sheriff's Department. If the scenario does not drive protective actions in McLean County, the County may decide to down staff the EOC to minimum staffing. A roster will be provided to demonstrate 24-hour County staffing of the EOC. Evaluators will not be allowed to remove the roster from the EOC.

An evaluator will be positioned at the County Sheriff's Communications Center (initial warning point) at the start of the exercise.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

This criterion will not be demonstrated during this exercise.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

Coordination of decisions and emergency activities will be demonstrated between McLean County and DeWitt County.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.

McLean County will use commercial telephone, radio and telefax to communicate with departments and agencies at other locations.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

McLean County will adequately demonstrate the ability to support operations through the use of maps, status boards and other displays as appropriate. The availability of dosimetry and KI will be demonstrated during the traffic and access control demonstration. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.

This criterion does not apply to McLean County.

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

This criterion does not apply to McLean County.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

This criterion does not apply to McLean County.

Criterion 2.e.1: Timely post-plume phase re-location, re-entry and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the OROs plan and/or procedures.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

McLean County will demonstrate this criterion by close coordination with IEMA and timely dissemination and exchange of information within the County Dosimetry Control Officer network.

This criterion will also be demonstrated during the traffic and access control demonstration. The Sheriff's deputy will obtain dosimetry from the DCO in the County EOC. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals is maintained.

DeWitt County, as the primary county is responsible for coordination of KI to immobile populations. The State of Illinois will make an announcement through the JIC of the appropriate time for the public to consider voluntarily taking KI. McLean County is not responsible for either function.

Criterion 3.c.1: Protective action decisions are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools.

This criterion does not apply to McLean County.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Coordination between McLean County and DeWitt County will be demonstrated. The Sheriff's Deputy will be available to staff one post. The post for the demonstration will be selected by McLean County during the exercise based on exercise play if the scenario causes McLean County to staff posts. If it does not, the post will be selected by the evaluator.

The deputy may be asked to drive to the selected post location for the demonstration; however, this may be simulated at the discretion of the evaluator. If asked to drive to a post, the sheriff's department can chose the post that will require the least amount of time to reach. The staffing of the remaining posts will be simulated.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

The McLean County EOC staff will demonstrate the capability to identify and take appropriate actions concerning impediments to evacuation. A message will be injected by the Controller that will drive this demonstration. County personnel will deal with the impediment by identifying the equipment needed, discussing its estimated time of arrival, etc. Actual contacts with resource providers will be made and logged.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.

This criterion does not apply to McLean County.

Criterion 3.e.2: Appropriate measures, strategies and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk and agricultural production.

This criterion does not apply to McLean County.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

This evaluation area does not apply to McLean County.

EVALUATION AREA 5 - EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system.

This criterion does not apply to McLean County.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

This criterion does not apply to McLean County. This function is the responsibility of DeWitt County.

EVALUATION AREA 6 - SUPPORT OPERATION/FACILITIES

This evaluation area does not apply to McLean County.

Piatt County Extent-of-Play Agreement

Criteria that can be re-demonstrated immediately for credit, at the discretion of the evaluator, include the following: 3.a.1, 3.d.1, 6.a.1, 6.b.1, 6.c.1 and 6.d.1. Criteria that may be re-demonstrated, as approved on a case-by-case basis by the Chairperson of the Regional Assistance Committee, include the following: 2.a.1, 2.b.1, 2.b.2, 3.d.2, 5.a.1 and 5.b.1.

EVALUATION AREA 1 - EMERGENCY OPERATIONS MANAGEMENT

Criterion 1.a.1: OROs use effective procedures to alert, notify and mobilize emergency personnel and activate facilities in a timely manner.

Piatt County intends to activate the Emergency Operations Center (EOC) in Monticello, Illinois, to the appropriate level. The County will implement notification procedures as defined in IPRA-Clinton. The EOC will be staffed with representatives from the County Board, EMA and the Sheriff's Department. If the scenario does not drive protective actions in Piatt County, the County may decide to down staff the EOC to minimum staffing. A roster will be provided to demonstrate 24-hour County staffing of the EOC. Evaluators will not be allowed to remove the roster from the EOC.

An evaluator will be positioned at the County Sheriff's Communications Center (initial warning point) at the start of the exercise.

Criterion 1.b.1: Facilities are sufficient to support the emergency response.

This criterion will be demonstrated during this exercise at the new Piatt County EOC.

Criterion 1.c.1: Key personnel with leadership roles for the ORO provide direction and control to that part of the overall response effort for which they are responsible.

Coordination of decisions and emergency activities will be demonstrated between Piatt County and DeWitt County.

Criterion 1.d.1: At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations.

Piatt County will use commercial telephone, radio and telefax to communicate with departments and agencies at other locations.

Criterion 1.e.1: Equipment, maps, displays, dosimetry, potassium iodide (KI) and other supplies are sufficient to support emergency operations.

Piatt County will adequately demonstrate the ability to support operations through the use of maps, status boards and other displays as appropriate. The availability of dosimetry and KI will be demonstrated during the traffic and access control demonstration. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

EVALUATION AREA 2 - PROTECTIVE ACTION DECISION MAKING

Criterion 2.a.1: OROs use a decision-making process, considering relevant factors and appropriate coordination, to ensure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of administrative limits or protective action guides.

This criterion does not apply to Piatt County.

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data and licensee and ORO dose projections, as well as knowledge of on-site and off-site environmental conditions.

This criterion does not apply to Piatt County.

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions (PADs) for the general public (including the recommendation for the use of KI, if ORO policy).

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

Criterion 2.c.1: Protective action decisions are made, as appropriate, for groups of people with disabilities and those with access/functional needs.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

Criterion 2.d.1: Radiological consequences for the ingestion pathway are assessed and appropriate protective action decisions are made based on the ORO planning criteria.

This criterion does not apply to Piatt County.

Criterion 2.e.1: Timely post-plume phase re-location, re-entry and return decisions are made and coordinated as appropriate, based on assessments of the radiological conditions and criteria in the OROs plan and/or procedures.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

EVALUATION AREA 3 - PROTECTIVE ACTION IMPLEMENTATION

Criterion 3.a.1: The OROs issue appropriate dosimetry, KI, and procedures, and manage radiological exposure to emergency workers in accordance with the plan 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. Appropriate record-keeping of the administration of KI for emergency workers is maintained.

Piatt County will demonstrate this criterion by close coordination with IEMA and timely dissemination and exchange of information within the County Dosimetry Control Officer network.

This criterion will also be demonstrated during the traffic and access control demonstration. The Sheriff's deputy will obtain dosimetry from the DCO in the County EOC. The DCO briefing for the deputy demonstrating traffic and access control will be conducted at the County EOC.

Criterion 3.b.1: KI and appropriate instructions are available in case a decision to recommend use of KI is made. Appropriate record keeping of the administration of KI for institutionalized individuals is maintained.

DeWitt County, as the primary county is responsible for coordination of KI to immobile populations. The State of Illinois will make an announcement through the JIC of the appropriate time for the public to consider voluntarily taking KI. Piatt County is not responsible for either function.

Criterion 3.c.1: Protective action decisions are implemented for people with disabilities and those with access/functional needs other than schools within areas subject to protective actions.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

Criterion 3.c.2: OROs/School officials decide upon and implement protective actions for schools.

This criterion does not apply to Piatt County.

Criterion 3.d.1: Appropriate traffic and access control is established. Accurate instructions are provided to traffic and access control personnel.

Coordination between Piatt County and DeWitt County will be demonstrated. The Sheriff's Deputy will be available to staff one post. The post for the demonstration will be selected by Piatt County during the exercise based on exercise play if the scenario causes Piatt County to staff posts. If it does not, the post will be selected by the evaluator.

The deputy may be asked to drive to the selected post location for the demonstration; however, this may be simulated at the discretion of the evaluator. The staffing of the remaining posts will be simulated.

Criterion 3.d.2: Impediments to evacuation are identified and resolved.

The Piatt County EOC staff will demonstrate the capability to identify and take appropriate actions concerning impediments to evacuation. A message will be injected by the Controller that will drive this demonstration. County personnel will deal with the impediment by identifying the equipment needed, discussing its estimated time of arrival, etc. Actual contacts with resource providers will be made and logged.

Criterion 3.e.1: The ORO demonstrates the availability and appropriate use of adequate information regarding water, food supplies, milk and agricultural production within the ingestion exposure pathway emergency planning zone for implementation of protective actions.

This criterion does not apply to Piatt County.

Criterion 3.e.2: Appropriate measures, strategies and pre-printed instructional material are developed for implementing protective action decisions for contaminated water, food products, milk and agricultural production.

This criterion does not apply to Piatt County.

Criterion 3.f.1: Decisions regarding controlled re-entry of emergency workers and relocation and return of the public are coordinated with appropriate organizations and implemented.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

EVALUATION AREA 4 - FIELD MEASUREMENT AND ANALYSIS

This evaluation area does not apply to Piatt County.

EVALUATION AREA 5 - EMERGENCY NOTIFICATION AND PUBLIC INFORMATION

Criterion 5.a.1: Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current REP guidance.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

Criterion 5.a.2: [RESERVED]

Criterion 5.a.3: Backup alert and notification of the public is completed within a reasonable time following the detection by the ORO of a failure of the primary alert and notification system.

This criterion does not apply to Piatt County.

Criterion 5.a.4: Activities associated with FEMA approved exception areas (where applicable) are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation.

This criterion does not apply to Piatt County.

Criterion 5.b.1: OROs provide accurate emergency information and instructions to the public and the news media in a timely manner.

This criterion does not apply to Piatt County. This function is the responsibility of DeWitt County.

EVALUATION AREA 6 - SUPPORT OPERATION/FACILITIES

This evaluation area does not apply to Piatt County.

APPENDIX F: SCENARIO DETAILS

<h3>SCENARIO INFORMATION</h3>

- ❖ **Exercise Time Line**
- ❖ **Narrative Summary**
- ❖ **Summary of Expected EALs and PARs**
- ❖ **Meteorology**
- ❖ **Release Information**

EXERCISE TIME LINE (March 26, 2013)

Initial Conditions	
The plant is at full power on a 188 day run; Div 2 VG Exhaust Fan and Cooling Fan are out of service for charcoal replacement - LCO 3.6.4.3 Action A.1 is in effect - Charcoal is removed from the system; On-Line Risk Level is Green; Planned deliver this shift of a Sodium Hypochlorite truck.	
Scenario (Wind Speed 8 mph, Starting Wind Direction 090°, Stability Class D)	
0745 (0)	Start Scenario – Crew Assumes Shift
0800 (15)	<p>UNUSUAL EVENT (HU5.1) - Release of toxic, corrosive, asphyxiant, or flammable gases deemed detrimental to NORMAL PLANT OPERATIONS. Threshold: 1. Toxic, corrosive, asphyxiant or flammable gases in amounts that have or could adversely affect NORMAL PLANT OPERATIONS.</p> <p>CONTROL MESSAGE: Report from Site Security that a chemical tank truck containing Sodium Hypochlorite is leaking at the plant truck security access portal and the immediate area has been evacuated. [T=0 for the UNUSUAL EVENT]</p>
0830 (45)	<p>Miscellaneous Equipment failure</p> <ul style="list-style-type: none"> When Ops Crew attempts to align Control Room Ventilation in the Chlorine Mode per off-normal response procedures – a Hydramotor failure prevents closure of MRC Train A Min OS Air Damper occurs [Mock-up – ERO can fix and return to service]
0845 (60) [UE+45]	<p>ALERT (HA5) - Access to a VITAL AREA is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of operable equipment required to maintain safe operations or safely shutdown the reactor. Access to a Table H2 area (Screenhouse) is prohibited due to toxic, corrosive, asphyxiant or flammable gases, which jeopardize operation of systems required to maintain safe operations or safely shutdown the reactor.</p> <p>CONTROL MESSAGE: Security notifies the Control Room that the toxic gas leak has worsened and intensified when it reached the area around the Chemical Building and the toxic gas cloud has now reached the Intake Screenhouse. Security also reports that all personnel have exited the Screenhouse. [T=0 for the ALERT]</p> <p>Shift Emergency Director will Initiate ERO notifications; Plant PA for ALERT and Staffing; NARS and ENS notifications performed; Technical Support Center (TSC), Operations Support Center (OSC) and Emergency Operations Facility (EOF) will be activated.</p>
0915 (90)	<p>Miscellaneous Equipment failure</p> <ul style="list-style-type: none"> (0915) Failure of the Containment Air Lock Outer Door (Reported by person exiting containment - CONTROL MESSAGE) (~0925) Main Condenser Vacuum Leak – Vacuum Breaker seal failure [MM task]
0930 (105)	Wind shift to Wind Direction from 005°
~0935-0945 (~110)	<p>Reactor SCRAM / Steam Break into Drywell - Reactor SCRAM - ALL Rods DO NOT insert BUT power <5%</p> <ul style="list-style-type: none"> Operator action in response to vacuum leak results in MANUAL Reactor SCRAM; Fuel damage occurs (7 rods do not insert); Steam break downstream of a Safety Relief Valve into the Drywell; Steam break results in Drywell pressure > 1.68 psig (concurrent FA1 due to Loss of RCS) Main Steam Isolation Valve (MSIV) isolation on low Main Condenser vacuum (either automatically or through crew action) due to unisolable air leak into Main Condenser (MSIVs remain closed for remainder of drill) Div 2 Emergency Diesel Generator fails to auto-start on reactor SCRAM Residual Heat Removal (RHR) Pump 'C' trips on auto-start CRS 1E12-F028A will not open and 1E12-F028B supply breaker has tripped Drywell and Containment radiation levels increase due to the steam break and containment bypass leakage
0955 (130) [ALERT+70]	<p>SITE AREA EMERGENCY (FS1) - Loss or Potential Loss of ANY two barriers. Loss of RCS and Loss of Fuel Clad</p> <ul style="list-style-type: none"> (~0955) Drywell Radiation exceeds 260 R/hr OR Containment Radiation exceed 41.3 R/hr - [T=0 for the SAE] ERO Declares SITE AREA EMERGENCY – FS1 – due to Loss of Fuel Clad (FC5) and Loss of RCS (RC3 and RC5) Assembly/Accountability will be performed (actual)
1110 (205) [SAE+75]	<p>GENERAL EMERGENCY (FG1) - Loss of ANY two barriers AND Loss or Potential Loss of third barrier. Loss of Containment (CT3.1/3.2) – Primary to Secondary Containment failure occurs and Secondary Containment/Aux Building Radiation levels increase, Release to environment begins via SGTS.</p> <ul style="list-style-type: none"> Primary Containment to Secondary Containment inner airlock door failure has occurred – Containment pressure will decrease – Loss of Containment (CT3.1/CT3.2) Rapid unexplained drop in containment pressure following initial pressure rise [Slow the containment leak rate when inserted .1 psi per 2 to 3 minutes should be sufficient] Release in progress (URI Release Path S – RCS to Drywell to Primary Cont to Secondary Cont to SGTS to Env) ERO Declares GENERAL EMERGENCY – FG1 – due to Loss of ALL three Fission Product Barriers - Previously identified Loss of Fuel Clad (FC5) with Loss of RCS (RC3 and RC5) and Loss of Containment (CT3.1/CT3.2 [T=0 for the GE] OR CT6.1) PARS (Wind Direction from 005°) Sub-Area 1
1240	Exercise Termination

NARRATIVE SUMMARY

NORMAL OPERATIONS (0745 – 0759)

The Operating Crew will be briefed at 0700 and is expected to take the shift by 0745. They will be expected to continue operations at full power. [Initial Wind Direction from 090°]

UNUSUAL EVENT (0800 – 0844)

UNUSUAL EVENT (HU5.1): Release of toxic, corrosive, asphyxiant, or flammable gases deemed detrimental to NORMAL PLANT OPERATIONS.

EAL Threshold Values:(1) Toxic, corrosive, asphyxiant, or flammable gases in amounts that have or could adversely affect NORMAL PLANT OPERATIONS.

CONTROL MESSAGE: Report from Site Security that a chemical tank truck containing Sodium Hypochlorite is leaking at the plant truck security access portal and the immediate area has been evacuated. **[T=0 for the UNUSUAL EVENT]**

Onsite Expected Actions

1. The Shift Emergency Director should declare an Unusual Event based on HU5.1
- Release of toxic, corrosive, asphyxiant, or flammable gases deemed detrimental to NORMAL PLANT OPERATIONS.
2. All appropriate notifications (PA, Dialogic, Station Duty Manager, NDO, etc.) will be made.
3. Ops Crew will align Control Room Ventilation in the Chlorine Mode.
~0830 - a Hydra-motor failure prevents closure of MRC Train A Min OS Air Damper occurs [Mock-up – ERO can fix and return to service]

Offsite Expected Actions

Approx Time

0800 An Unusual Event (U.E.) is declared at Clinton Station

 IEMA Telecommunicator verifies the NARS message.

 IEMA Telecommunicator notifies IEMA personnel of the U.E. per SOP.

 IEMA Telecommunicator notifies DeWitt County of the U.E. via NARS.

 IEMA monitors the situation at Clinton Station.

ALERT (0845 – 0954)

ALERT (HA5): HA5 Access to a VITAL AREA is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of operable equipment required to maintain safe operations or safely shutdown the reactor.

EAL Threshold Values: Access to a Table H2 area (Screenhouse) is prohibited due to toxic, corrosive, asphyxiant or flammable gases, which jeopardize operation of systems required to maintain safe operations or safely shutdown the reactor.

CONTROL MESSAGE: Security notifies the Control Room that the toxic gas leak has worsened and intensified when it reached the area around the Chemical Building and the toxic gas cloud has now reached the Intake Screenhouse. Security also reports that all personnel have exited the Screenhouse. **[T=0 for the Alert]**

Onsite Expected Actions

1. The Shift Emergency Director should declare an ALERT based on HA5 - Access to a VITAL AREA (Screenhouse) is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of operable equipment required to maintain safe operations or safely shutdown the reactor.
2. All appropriate notifications (PA, Dialogic, Station Duty Manager, NDO, etc.) will be made. The TSC, OSC, EOF and JIC will be staffed and activated.
3. Command and Control will be transferred in accordance with procedures to the EOF. Non-delegable responsibilities will be addressed during this turnover process.
4. County Liaison will be requested and dispatched.
5. The Field Monitoring Teams may be dispatched (TSC / EOF).

Offsite Expected Actions

Approx Time

0900 Exelon notifies the IEMA Telecommunicator of the ALERT via NARS.

IEMA Telecommunicator verifies the NARS message.

An IEMA Duty Officer contacts the Clinton Station Shift Engineer.

IEMA Telecommunicator notifies IEMA personnel of the ALERT per SOP.

IEMA may activate the State of Illinois Response Center (SIRC) and Radiological Emergency Assessment Center (REAC), if appropriate.

IEMA may dispatch liaisons to the County EOCs, Unified Area Command (UAC), Radiological Assessment Field Team (RAFT), Joint Information Center (JIC), Technical Support Center (TSC) and Emergency Operations Facility (EOF), if appropriate.

IEMA notifies Governor's Office of the ALERT. (Simulated)

IEMA Telecommunicator notifies appropriate State agencies of the ALERT.

IEMA notifies FEMA of the ALERT. (Simulated)

Approx Time

0915 IEMA Telecommunicator notifies DeWitt County of the ALERT via NARS.

DeWitt County telecommunicator completes and verifies the NARS message.

DeWitt County telecommunicator notifies County officials, support counties and municipalities of the ALERT per SOP.

Support county and municipal telecommunicators complete and verify the NARS message.

Support county and municipal telecommunicators notify officials of the ALERT per SOP.

Counties may activate the EOC, if appropriate.

Onsite Miscellaneous Equipment failure (~0915)

1. (0915) Failure of the Containment Air Lock Outer Door (Reported by person exiting containment - **CONTROL MESSAGE**)
2. (~0925) Main Condenser Vacuum Leak – Vacuum Breaker seal failure [MM task]

Wind Shift – Wind Direction from 005° (~0930)

Reactor SCRAM / Steam break into Drywell (0935)

Reactor SCRAM / Steam Break into Drywell - Reactor SCRAM - ALL Rods DO NOT insert BUT power <5%

1. Operator action in response to vacuum leak results in MANUAL Reactor SCRAM; Fuel damage occurs (7 control rods do not insert); Steam break downstream of a Safety Relief Valve into the Drywell; Steam break results in Drywell pressure > 1.68 psig (*concurrent FA1 due to Loss of RCS (RC3)*)
2. MSIV isolation on operator action or Lo Vacuum (MSIVs remain closed for remainder of drill)
3. Div 2 Emergency Diesel Generator fails to auto-start on reactor SCRAM
4. RHR Pump 'C' trips on auto-start
5. Containment Spray - CRS 1E12-F028A will not open and 1E12-F028B supply breaker has tripped
6. Drywell and Containment radiation levels increase due to the steam break and containment bypass leakage

SITE AREA EMERGENCY (0955-1109)

Site Area Emergency (FS1): A Loss or Potential Loss and ANY two barriers. Loss of RCS and Loss of Fuel Clad

EAL Threshold Values (FC 5.1/5.2): Drywell Radiation exceeds 260 R/hr OR Containment Radiation exceeds 41.3 R/hr. [T=0 for the SAE]

Onsite Expected Actions

1. ERO Declares SITE AREA EMERGENCY (FS1) due to Loss of Fuel Class (FC 5.1/5.2) and Loss of RCS (RC3 and RC5)
2. All appropriate notifications (PA, Dialogic, Station Duty Manager, NDO, etc.) will be made.

Offsite Expected Actions

Approx Time

- | | |
|------|--|
| 0955 | A SITE AREA EMERGENCY is declared at Clinton Station. |
| 1010 | Exelon notifies the IEMA Telecommunicator of the SITE AREA EMERGENCY via NARS. |

Approx Time

- 1010 IEMA Telecommunicator verifies the NARS message.
- REAC contacts the Clinton Station Shift Engineer.
- SIRC is activated if not previously activated.
- SIRC notifies the Governor's Office and requests that a representative report to the State EOC. (Simulated)
- State dispatches liaisons to the County EOCs, UAC, RAFT, JIC, TSC and EOF, if not previously dispatched.
- SIRC notifies FEMA of conditions.
- IEMA notifies State agencies (Simulated):
- Illinois State Police
 - IDOT/Division of Highways
 - IDOT/Division of Aeronautics
 - IDNR
 - Illinois National Guard
 - ICC
 - American Red Cross
 - IDPH
 - IEPA
 - IDOC
 - IDHS
 - IDOA
 - Office of the State Fire Marshal
 - others as appropriate
- REAC contacts Federal agencies. (Simulated)
- REAC provides an update to the SIRC and County EOC Liaisons.
- REAC provides an update to the JIC.
- 1025 IEMA notifies DeWitt County of the SITE AREA EMERGENCY via NARS.
- DeWitt County telecommunicator completes and verifies the NARS message.
- DeWitt County telecommunicator notifies County officials, support counties and municipalities of the SITE AREA EMERGENCY per SOP.
- DeWitt County implements public notification procedures, if appropriate. (Simulated)

Approx Time

- 1025 Support county and municipal telecommunicators complete and verify the NARS message.
- Support county and municipal telecommunicators notify officials per SOP.
- County EOCs are activated if not previously activated.
- Dosimetry is issued to emergency personnel, EOC staff and exposure records are completed.
-

GENERAL EMERGENCY (1110-1240)

GENERAL EMERGENCY (FG1): Loss of ANY two barriers AND Loss or Potential Loss of third barrier. Loss of Containment (CT3.1/3.2) – Primary to Secondary Containment failure occurs and Secondary Containment/Aux Building Radiation levels increase, Release to environment begins via Standby Gas Treatment System (SGTS).

EAL Threshold Values (CT3.1/CT3.2): Primary Containment to Secondary Containment airlock door failure has occurred – Containment pressure will decrease – Loss of Containment (CT3.1/CT3.2) Rapid unexplained drop in containment pressure following initial pressure rise. [Containment pressure will decrease]

Onsite Expected Actions

1. TSC should identify the failure of the Third Fission Product Barrier AND that a **RELEASE IS OCCURRING.**
2. The Station Emergency Director should classify a GENERAL EMERGENCY, based on EAL FG1.
Loss of ALL three Fission Product Barriers - Loss of Containment (CT3.1/CT3.2 OR CT6.1) [**T=0 for the GE**] with previously identified Loss of Fuel Clad (FC5) and Loss of RCS (RC3 and RC5).
3. All appropriate notifications should be made.
4. **Release in progress** (URI Release Path S – RCS to Drywell to Primary Cont to Secondary Cont to SGTS to Env)
PARS (Wind Direction from 005°) Sub-Area 1

Offsite Expected Actions

Approx Time

- 1110 A GENERAL EMERGENCY is declared at Clinton Station.
- 1125 Exelon notifies the IEMA Telecommunicator of the GENERAL EMERGENCY via NARS. Protective actions are recommended.
- IEMA Telecommunicator verifies the NARS message.
- SIRC and REAC evaluate the protective action recommendation.
- A recommendation is made to the Governor. The Governor recommends that protective actions be implemented.
- SIRC staff is advised of the situation.
- SIRC advises UAC, the County EOC liaisons and JIC staff of the situation.
- SIRC notifies FEMA of conditions. (Simulated)
- REAC provides an update to the SIRC and County EOC liaisons.
- REAC provides an update to the JIC.
- 1140 SIRC notifies DeWitt County of the GENERAL EMERGENCY and the recommended protective actions via NARS.
- DeWitt County telecommunicator completes and verifies the NARS message.
- DeWitt County telecommunicator notifies County officials, support counties and municipalities per SOP.
- DeWitt County implements public notification procedures and traffic and access control per SOPs, as applicable.
- Support county and municipal telecommunicators complete and verify and the NARS message.
- Support county and municipal telecommunicators notify EOC staff.

EXERCISE TERMINATION (~1240)

The Clinton REP Exercise will terminate after concurrence from the State of Illinois has been received. All facilities will terminate exercise participation and conduct self-critiques of their performance.

SUMMARY OF EXPECTED EALs and PARs

EALs:

Time	EAL #	Description
0800	HU5.1	UNUSUAL EVENT - HU5.1 - Release of toxic, corrosive, asphyxiant, or flammable gases deemed detrimental to NORMAL PLANT OPERATIONS. EAL Threshold Values: Threshold: 1. Toxic, corrosive, asphyxiant or flammable gases in amounts that have or could adversely affect NORMAL PLANT OPERATIONS.
0845 [UE+45]	HA5	ALERT - HA5 - Access to a VITAL AREA is prohibited due to toxic, corrosive, asphyxiant or flammable gases which jeopardize operation of operable equipment required to maintain safe operations or safely shutdown the reactor. Access to a Table H2 area [Screenhouse] is prohibited due to toxic, corrosive, asphyxiant or flammable gases, which jeopardize operation of systems required to maintain safe operations or safely shutdown the reactor.
~0945	FA1	Loss of RCS barrier - Reactor Scram / Steam Break into Drywell - ALL Rods DO NOT insert BUT power <5% - Fuel damage occurs Concurrent ALERT due to Loss of the RCS Barrier - RC3 - 1. Drywell pressure > 1.68 psig AND 2. Drywell pressure rise due to RCS leakage.
0955 [ALERT+70]	FS1	SITE AREA EMERGENCY - FS1 - Loss or Potential Loss of ANY two barriers. - Drywell pressure and radiation monitor readings increase. Drywell to containment bypass leakage results in increasing containment pressure and radiation monitor readings. Loss of RCS: RC3 - 1. Drywell pressure > 1.68 psig AND 2. Drywell pressure rise due to RCS leakage. OR RC5 - 1. Drywell radiation > 100 R/hr OR 2. Emergency RPV Depressurization is required. Loss of Fuel Clad: FC5 - 1. Drywell radiation monitor reading > 260 R/Hr OR 2. Containment radiation monitor > 41.3 R/Hr
1110 [SAE+75]	FG1	GENERAL EMERGENCY - FG1 - Loss of ANY two barriers AND Loss or Potential Loss of the third barrier (release in progress) – Primary Containment to Secondary Containment airlock door failure With the two previous fission product barrier failures - Loss of Fuel Clad (FC5) and Loss of RCS (RC3 and RC5) - Results in Loss of ALL 3 Fission Product Barriers: Loss of Containment: CT3.1 - Rapid unexplained drop in containment pressure following initial pressure rise. OR CT3.2 - Containment pressure response not consistent with LOCA conditions. OR CT6.1.a – Failure of isolation valves in any one line to close. AND CT6.1.b Direct downstream pathway to the environment exists after a primary containment isolation signal.
1240		Anticipated Termination

PARs: Wind from 005°

Time	Event	Release	Affected Counties / Sub-Area
0800	HU5.2 – UNUSUAL EVENT	None	None
0845	HA5 - ALERT	None	None
0955	FS1 - SITE AREA EMERGENCY	None	None
1110	FG1 - GENERAL EMERGENCY Protective Action Recommendation (PARs)	Occurring	DeWitt County - 1
1240	Anticipated Termination		

METEOROLOGY

The meteorology parameters are:

Wind from	090°initial – shift to 005° @ ~0930
Wind speed	8.0 mph
Stability Class	D
Air temperature	48°F
Precipitation	None

RELEASE INFORMATION

Release Path is a monitored release from the RCS to the Secondary Containment/Aux Building via a failure of the Primary Containment airlock doors that can not be isolated. The release is through the Standby Gas Treatment System (SGTS) which is considered a ground level release. All Dose-Based PARs bounded by Plant-Based PARs.

The peak release occurs at approximately 1130. Dose projections for the release were developed using the URI program.

URI Release Path (S) is from the RCS to the Drywell to Primary Containment to Secondary Containment to SGTS to the Environment. CDAM indicates 13% clad damage based on Containment Radiation analysis (6% clad damage based on Drywell Radiation). 13% clad damage was used for URI calculations. Process Reduction factor is 6.40E-05 when the release starts.

DOSE PROJECTIONS

The following peak dose projections are based on the data from the 1130-1144 dose kernel found in Section 8:

URI Release Path S:	<RCS> <Drywell><Primary Cont><Secondary Cont><SGTS Filters><SGTS Stack><Env>
Core Damage:	13% Clad Damage
PRF:	6.40E-05 when release starts
Time After Shutdown:	1:45
Release Duration:	3:30 (Weekday, Day Time)

Distance	TEDE (Rem)	CDE (Rem)
SB	1.53E+00	5.32E-01
2 Miles	2.97E-01	5.57E-02
5 Miles	1.02E-01	1.30E-02
10 Miles	5.47E-02	7.08E-03

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