



# FEMA

## Final Exercise Report

# Enrico Fermi 2 Nuclear Power Plant

Licensee: **Detroit Edison Company**

Exercise Date: **March 23, 2004**

Report Date: **June 21, 2004**

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**U.S. DEPARTMENT OF HOMELAND SECURITY  
FEMA REGION V  
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## **I. EXECUTIVE SUMMARY**

On March 23, 2004, an exercise was conducted in the plume exposure pathway emergency planning zone (EPZ) around the Enrico Fermi 2 Nuclear Power Plant by the Federal Emergency Management Agency (FEMA), Region V. The purpose of this exercise was to assess the level of State and local preparedness in responding to a radiological emergency. This exercise was held in accordance with 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 September 24, 2002. The qualifying emergency preparedness exercise was conducted on February 2, 1982.

FEMA wishes to acknowledge the efforts of the many individuals who participated in this exercise. In the State of Michigan the risk counties of Monroe and Wayne participated along with the 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 was evident during this exercise.

This final report contains the evaluation of the March 23, 2004, biennial exercise.

The State and local organizations, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures, and adequately implemented them. No Deficiencies were identified during this exercise. Two new Areas Requiring Corrective Action (ARCA) were identified during this exercise. The first ARCA was identified at the State EOC under Criterion 2.b.2, wherein Agriculture Advisories were issued concurrently with evacuation orders. The second ARCA was identified at the Joint Public Information Center (JPIC) under Criterion 5.b.1, wherein PIO staff issued press releases with incomplete information. Two prior ARCA remain unresolved. These include one ARCA for Monroe County under Criterion 5.b.1, Emergency Information and Instructions for the Public and Media; and one ARCA for Wayne County under Criterion 5.a.1, Activation of the Prompt Alert and Notification System. A detailed discussion of these issues can be found in Part IV of this Report.

## II. INTRODUCTION

On December 7, 1979, the President directed FEMA to assume the lead responsibility for all off-site nuclear planning and response. FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351, and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

The FEMA Rule 44 CFR 350 establishes the policies and procedures for 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.

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

- Taking the lead in off-site 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 FEMA Region V Regional Assistance Committee (RAC), which is chaired by FEMA.

Formal submission of the RERPs for the Enrico Fermi 2 Nuclear Power Plant to FEMA Region V by the State of Michigan and involved local jurisdictions occurred on March 22, 1982. Formal approval of these RERPs was granted by FEMA on March 9, 1987, under 44 CFR 350.

A REP exercise was conducted on March 23, 2004, and evaluated by FEMA Region V, to assess the capabilities of State and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving the Enrico Fermi 2 Nuclear Power Plant. The purpose of this exercise report is to present the exercise results and findings on the performance of the off-site response organizations (ORO) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the Federal evaluation team, with final determinations made by the FEMA Region V RAC Chairperson, and approved by the Regional Director.

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-REP-14, "Radiological Emergency Preparedness Exercise Manual," September 1991; and
- FEMA "Radiological Emergency Preparedness: Exercise Evaluation Methodology" as published in the Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002.

Section III of this report, entitled "Exercise Overview", presents basic information and data relevant to the exercise. This section of the report contains a description of the plume pathway EPZ, a listing of all participating jurisdictions and functional entities, which were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

Section IV of this report, entitled "Exercise Evaluation and Results," 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 and ARCAs 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.

### III. EXERCISE OVERVIEW

Contained in this section are data and basic information relevant to the March 23, 2004, exercise to test the off-site emergency response capabilities in the area surrounding the Enrico Fermi 2 Nuclear Power Plant. This section of the exercise report includes a description of the 10-mile plume pathway EPZ, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of the actual occurrence of key exercise events and activities.

#### A. Plume Emergency Planning Zone Description

The Enrico Fermi 2 Nuclear Power Plant is comprised of approximately 1,120 acres of land owned by the Detroit Edison Company (Edison). The site is bounded on the north by Swan Creek, on the east by Lake Erie, on the south by Pointe Aux Peaux Road, and on the west by Toll Road. Entrance to the site is from Enrico Fermi Drive (a private road owned by Edison) to the west, and from Pointe Aux Peaux Road to another private road owned by Edison to the south.

The plant is approximately six miles northeast of Monroe, Michigan; 30 miles southwest of downtown Detroit, Michigan; and 25 miles northeast of downtown Toledo, Ohio. The latitude of the site is 41° 57' 48" north and the longitude is 83° 15' 31" west. Site elevations range from the level of Lake Erie, on the eastern edge of the site, to approximately 25 feet above the lake level, on the western edge of the site.

The 10-mile EPZ includes parts of Monroe and Wayne Counties in Michigan; parts of Lake Erie; and the southern tip of Essex County, (Bay Point) Canada. Most of the 10-mile EPZ lies within Monroe County. Coordinated efforts occur between the two counties, which are divided into five Protective Action Areas. The following jurisdictions are located within the 10-mile EPZ: Ash Township, Carleton Village, Berlin Township, Estral Beach Village, Exeter Township, South Rockwood Village, Frenchtown Township, Monroe City, Monroe Township, Raisinville Township, Brownstown Township, Gibraltar City, Flat Rock City, and Rockwood City. The population in the 10-mile EPZ, based on the 2000 census, is 88,897.

Land use within the EPZ is diverse. About 55 percent of the land is farmland; the majority of agricultural land is located in Monroe County. The portion of Wayne County nearest to Detroit is a growing residential suburb. Twelve state parks and recreational areas, and several light industries are located within the 10-mile EPZ.

There are three major roads within 10 miles of the plant, Interstates 75 and 275, and U.S. Route 24. Their closest approach to the plant is 4.1 miles, 4.2 miles and 5.8 miles, respectively. Five railroad lines operate within 10 miles of the plant. These include the Canadian National Railroad, the Norfolk Southern Railroad, the Chesapeake and Ohio Railroad, the Detroit Toledo and Ironton Railroad, and the

Detroit and Toledo Shore Line Railroad. There are no major airports within 15 miles of

the site.

## **B. Exercise Participants**

The following agencies, organizations, and units of government participated in the Enrico Fermi 2 Nuclear Power Plant exercise on March 23, 2004:

### **STATE OF MICHIGAN**

- Department of Agriculture
- Department of Community Health
- Department of Environmental Quality
- Department of Natural Resources
- Department of State Police
- Department of Transportation
- Emergency Management Division
- Family Independence Agency
- Michigan Disaster Medical Assistance Team
- Office of the Governor - Executive Office
- Office of Services to the Aging
- Special Operation Division

### **RISK JURISDICTIONS**

#### **MONROE COUNTY**

- Agricultural Extension Services
- County Board of Commissioners
- Emergency Management Division
- Emergency Medical Services
- Family Independence Agency
- Fire Services
- Frenchtown Township
- Health Services
- Human Services
- Intermediate School District
- Michigan State Emergency Management Division
- Monroe City Police Services
- Public Affairs
- Public Works
- Road Commission
- Sheriff's Office
- Social Services





C. **Exercise Timeline**

Table 1, on the following page, presents the times at which key events and activities occurred during the Enrico Fermi 2 Nuclear Power Plant plume exposure pathway exercise on March 23, 2004. Also included are times that notifications were made to the participating jurisdictions/functional entities.

**Table 1. Exercise Timeline**  
**DATE AND SITE: March 23, 2004 – Enrico Fermi 2 Nuclear Power Plant**

Emergency Classification Level or Event	Time Utility Declared	Time That Notification Was Received or Action Was Taken			
		State of Michigan	Monroe County	Wayne County	Joint Public Information Center
Unusual Event	0829	0846	0840	0848	N/A
Alert	0900	0910	0910	0910	N/A
Site Area Emergency	1029	1042	1050	1048	1117
General Emergency	1140	1158	1158	1158	1158
Simulated Radiation Release Started	1144	1148	1206	1206	1158
Simulated Radiation Release Terminated	N/A	N/A	N/A	N/A	N/A
Facility Declared Operational		1000	1008	0930	1110
State: Declaration State of Disaster		1043	N/A	N/A	1045
Local: Declaration State of Emergency		NA	0943	0947	0947
Exercise Terminated		1347	1347	1347	1415
Agricultural Advisory #1: Shelter Livestock/Place on stored feed/water out to 10-Miles in Areas 1, 2, 3, 4		1045	1050	1053	1126
Agricultural Advisory #2: Food establishments move food inside and cover in Areas 1 and 2		1200	1205	1213	1213
Agricultural Advisory #3: Shelter Livestock/Place on stored feed/water out to 10-Miles in Areas 1, 2, 3, 4, 5 (added Area 5)		1220	1223	1224	1246
Agricultural Advisory #4: Food establishments move food inside and cover in Areas 1, 2, 3, 4 (added Areas 3 and 4)		1252	1306	1312	1252
School Advisory - Early precautionary evacuation		N/A	1051	1048	N/A
1st Protective Action Order: Evacuate Areas 1 and 2 and clear marine/lake activity within a 5-mile radius of the plant.		1158	1203	1203	1205
1st Siren Activation		N/A	1205	N/A	N/A
1st EAS Message		N/A	N/A	1209	N/A
2nd Protective Action Order: Evacuate Areas 1, 2, 3, 4 and clear marine/lake activity within a 10-mile radius of the plant.		1252	1258	1253	1302
2nd Siren Activation		N/A	1300	N/A	N/A
2nd EAS Message		N/A	N/A	1302	N/A
KI Administrative Decision: Emergency Workers in Areas 1 and 2 and marine areas out to 5-miles		1208	1213	1205	N/A
Emergency Workers in Areas 3 and 4 and marine areas out to 10-miles		1244	1305	1301	N/A

## IV. 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 23, 2004, exercise to test the off-site emergency response capabilities of State and local governments in the 10-mile EPZ surrounding the Enrico Fermi 2 Nuclear Power Plant.

Each jurisdiction and functional entity was evaluated based on its demonstration of exercise criteria delineated in Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002. Detailed information on the exercise criteria and the extent-of-play agreement used in this exercise are found in Appendix 3 of this report.

### A. Summary Results of Exercise Evaluation

The matrix presented in Table 2, on the following page(s), presents the status of all exercise criteria from Federal Register Notice/Vol. 67, No. 80, dated April 25, 2002, that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status of those criteria are indicated by the use of the following letters:

- M – Met (No Deficiency or ARCA assessed and no unresolved ARCAs from prior exercises)
- D – Deficiency assessed
- A – ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)
- N – Not Demonstrated (Reason explained in Section IV.B.)
- Blank – Not scheduled for demonstration

### Table 2. Summary Results of Exercise Evaluation

DATE AND SITE: March 23, 2004 – Enrico Fermi 2 Nuclear Power Plant (Sheet 1 of 2)

JURISDICTIONS/ FUNCTIONAL ENTITY	1. a. 1	1. b. 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. a. 1	3. b. 1	3. c. 1	3. c. 2	3. d. 1	3. d. 2	3. e. 1	3. e. 2	3. f. 1	4. a. 1	4. a. 2	4. a. 3	4. b. 1	4. c. 1	5. a. 1	5. a. 2	5. a. 3	5. b. 1	6. a. 1	6. b. 1	6. c. 1	6. d. 1			
<b><u>STATE OF MICHIGAN</u></b>																																				
Initial Notification Point	M			M																																
Emergency Operations Center	M		M	M	M	M		A	M							M											M			M						
Technical Support Group					M	M	M	M																												
Dosimetry/KI Distribution -- Michigan State Police EMD					M																															
Joint Public Information Center			M	M	M																												A			
Michigan State Police TCP/ACP				M	M							M	M			M																				
DEQ -- Evacuee/Vehicle M&D -- (Monroe County)												M																						M		
DEQ -- Evacuee/Vehicle M&D -- (Wayne County)												M																						M		
DEQ -- EW/Vehicle M&D -- (Wayne County)												M																					M	M		
DEQ -- EW/Vehicle M&D -- (Monroe County)												M																					M	M		
<b><u>RISK COUNTIES</u></b>																																				
<b><u>MONROE COUNTY</u></b>																																				
Initial Notification Point	M			M																																
Emergency Operations Center	M		M	M	M				M			M	M	M	M	M	M										M				M					
Traffic & Access Control Point				M	M							M	M			M																				
Joint Public Information Center, PIO																																			M	
Public Inquiry Hotline																																			U	
Protective Actions for School Children -- EV 2 -- Monroe Public Schools					M											M																				

LEGEND: M = Met (No Deficiency or ARCA(s) assessed)      A = ARCA(s) assessed (Not affecting health and safety of public)      Blank = Not scheduled for demonstration  
 D = Deficiency assessed      U = Unresolved ARCA(s) from prior exercise(s)      N = Not demonstrated as scheduled (Reason explained in Section IV.B.)

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## Table 2. Summary Results of Exercise Evaluation

DATE AND SITE: March 23, 2004 – Enrico Fermi 2 Nuclear Power Plant (Sheet 2 of 2)

JURISDICTIONS/ FUNCTIONAL ENTITY	1.	1.	1.	1.	1.	2.	2.	2.	2.	2.	2.	3.	3.	3.	3.	3.	3.	3.	3.	4.	4.	4.	4.	4.	5.	5.	5.	5.	6.	6.	6.	6.
	a.	b.	c.	d.	e.	a.	b.	b.	c.	d.	e.	a.	b.	c.	c.	d.	d.	e.	e.	f.	a.	a.	a.	b.	c.	a.	a.	a.	b.	a.	b.	c.
<b>MONROE (cont'd)</b>																																
Dosimetry/KI Distribution – County Health Department					M							M	M																			
Evacuee M&D – Whiteford High School												M																		M		
Evacuee Vehicle M&D – Whiteford High School																														M		
EW/Vehicle M&D – County Fair Grounds												M																	M	M		
Public Reception – Whiteford High School																													M			
Congregate Care – Whiteford High School																															M	
<b>WAYNE COUNTY</b>																																
Initial Notification Point	M			M																												
Emergency Operations Center	M		M	M	M			M				M	M	M	M	M	M									U		M				
Traffic & Access Control Point				M								M	M			M																
Joint Public Information Center, PIO																												M				
Emergency Alert System Radio Station – WJR																									M							
Protective Actions for School Children – EV 2 – Gibraltar Schools					M										M																	
Dosimetry/KI Distribution – Brownstone Fire Station #4					M							M	M																			
EW/Vehicle M&D – Brownstone Fire Station #4																														M	M	
Evacuee M&D – Taylor Center High School												M																		M		
Evacuee Vehicle M&D – Taylor Center High School																														M		
Public Reception– Taylor Center High School																														M		
Congregate Care– Taylor Center Middle School																																M

LEGEND: M = Met (No Deficiency or ARCA(s) assessed)    A = ARCA(s) assessed (Not affecting health and safety of public)    Blank = Not scheduled for demonstration  
 D = Deficiency assessed    U = Unresolved ARCA(s) from prior exercise(s)    N = Not demonstrated as scheduled (Reason explained in Section IV.B.)

## B. Status of Jurisdictions Evaluated

This subsection provides information on the evaluation of each participating jurisdiction and functional entity in a jurisdiction-based, issues-only format. Presented below are definitions of the terms used in this subsection relative to criteria demonstration status.

- **Met** – Listing of the demonstrated exercise criteria under which no Deficiencies or ARCAs were assessed during this exercise and under which no ARCAs assessed during prior exercises remain unresolved.
- **Deficiency** – Listing of the demonstrated exercise criteria under which one or more Deficiencies was assessed during this exercise. Included is a description of each Deficiency and recommended corrective actions.
- **Area Requiring Corrective Action** – Listing of the demonstrated exercise criteria under which one or more ARCAs were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of the ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.
- **Not Demonstrated** – Listing of the 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 in this exercise and the corrective actions demonstrated.
- **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 biennial exercise.

The following are definitions of the two types of exercise issues that maybe discussed in this report.

- A **Deficiency** is defined in FEMA-REP-14 as "...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."
- An **ARCA** is defined in FEMA-REP-14 as "...an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety."

The FEMA has developed a standardized system for numbering exercise issues (Deficiencies and ARCAs). This system is used to achieve consistency in numbering exercise issues among 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 and ARCAs 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.
- **Exercise Year** – The last two digits of the year the exercise was conducted.
- **Criterion Number** – An alpha and two-digit number corresponding to the criteria numbers in the six Exercise Evaluation Areas described in Federal Register Notice/Vol. 67, No. 80 dated April 25, 2002, which amends FEMA-REP 14, Radiological Emergency Preparedness Exercise Manual.
- **Issue Classification Identifier** – (D = Deficiency, A = ARCA). Only Deficiencies and ARCAs are included in exercise reports. Planning Issues are reported to the State(s) via a letter from the Regional Director. Therefore, standardized issue numbers are not assigned to Planning Issues.
- **Exercise Identification Number** – A separate two- (or three-) digit indexing number assigned to each issue identified in the exercise.



# 1. STATE OF MICHIGAN

## 1.1 Initial Notification Point

- a. **MET:** Criteria 1.a.1 and 1.d.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

## 1.2 Emergency Operations Center

- a. **MET:** Criteria 1.a.1; 1.c.1; 1.d.1; 1.e.1; 2.a.1; 2.c.1; 3.d.1; 5.a.1; and 5.b.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** 2.b.2

**Issue No:** 23-04-2.b.2-A-01

**Condition:** The Agriculture Advisories for Food Establishments, Feed Operators, and Facilities were issued at the same time (1200 and 1252 hours) the general public was being instructed to evacuate.

**Possible Cause:** State procedures and plans do not address the precautionary decision-making process for issuing Agriculture Advisories, nor give consideration to the affects of decisions on evacuation.

**Reference:** NUREG-0654, J.9, 10.m; FDA Guidance titled “Accidental Radioactive Contamination of Human Food and Animal Feeds: Recommendations for Sate and Local Agencies.”

**Effect:** Delaying the evacuation of individuals may subject them to radiation exposure that could be avoided.

**Recommendation:** Plans, procedures, and pre-scripted messages should be revised to ensure that Agriculture Advisory decision-making processes consider potential affects on the implementation of Agriculture Advisories as precautionary measures prior to a PAO for sheltering or evacuating the general public. Public

information brochures should also be issued to identify advisories as precautionary and when appropriate. Decision-makers should receive training concerning the revised plans.

**Schedule of Corrective Actions:** Michigan Department of Agriculture Procedures are specifically designed so that agricultural advisories are issued concurrent with the Governor's evacuation order in order to ensure that human and animal foods do not spoil or become contaminated to the fullest extent possible. Additionally, they are intended to eliminate the possibility of human or animal foods being moved out of an evacuation area. Foods and feed left outdoors may be freely taken by anyone who so chooses without restriction. These directives eliminate much of the potential for theft and consumption of contaminated human food and animal feeds.

We acknowledge the apparent contradiction in issuing agricultural advisories concurrent with evacuation orders, but strongly believe that the need to protect and control human and animal foods is essential. Further, the time required to accomplish actions identified in advisories is no different than the time acknowledged as being necessary for the general public to prepare for evacuation. Just as it is important for the general public to ensure that households are left in proper order, it is important for human and animal food establishments, operators, and facilities to ensure that they are properly shut down and secured.

The State of Michigan requests that this issue be reconsidered because we view these actions as being essential to: 1) control food spoilage, 2) control food and feed consumption and contamination within the evacuated area, and 3) prevent food and feed from leaving evacuated areas.

The Fermi 2 Public Information Brochure will be revised to delete any ties between emergency classifications and specific required actions.

**FEMA Response:** FEMA Region V does not concur. The State of Michigan Emergency Management Plan (Appendix I [Nuclear Accident Procedures] to Annex M [Department of Environmental Quality], Rev. 6/8/00, Sections C.3. and C.4., page M10) states that at the Site Area Emergency (SAE) Emergency Classification Level (ECL) "*The Departments of Environmental Quality and Agriculture have the responsibility to order and enforce limitations or alterations of food or water supplies, if necessary.*" At the General Emergency (GE) ECL, the plan states: "*The Governor may order evacuation of an affected area based upon applicable state and federal guidance. Evacuation aids specific for each nuclear facility are incorporated into the emergency operations plans of local governments affected by the accident and referenced in the NFERP*" [Nuclear Facilities Emergency Response Plan].

Page 10.2 of the NFERP, (Rev. 5) 4/2000, ATTACHMENT X, Section D, Item 24, references the following Food and Drug Administration (FDA) guidance:

HHS (FDA) Guidance – Accidental Radioactive Contamination of Human Food & Animal Feeds: Recommendations for State and Local Agencies.

Pages 25 and 26 of the FDA guidance (dated August 13, 1998) addresses precautionary actions prior to the arrival of contamination, including "... covering exposed products, moving animals to shelter, corralling livestock and providing protected feed and water" The guidance states that "*Precautionary actions should be implemented so as to avoid placing in jeopardy persons implementing the action. For example, in the case of an accident involving a commercial nuclear power plant, if the predictions of the magnitude of future off-site contamination are persuasive, precautionary actions that could be taken and completed before a declaration of Site Area Emergency or General Emergency could be considered* [underlining added for emphasis]. *However, precautionary actions that would involve persons either not seeking shelter or leaving the immediate vicinity of shelter should not be taken after declaration of a Site Area Emergency or General Emergency.*"

The Order issued by the State of Michigan could have placed food and feed handlers in potential jeopardy by unnecessarily forcing them to remain behind at a time when the rest of the population was being evacuated. The amount of time needed by food and feed vendors and handlers to protect consumables may be substantial and not comparable to that needed by the general public. Moreover, vendors and handlers are members of the public whose food, feed, and livestock protection responsibilities are in addition to their family evacuation responsibilities. The imperatives to protect the public from potentially contaminated foods and evacuate vendors in a timely manner can be mutually served by following the FDA guidance and implementing precautionary actions during or prior to the SAE ECL that will ensure the safety of consumables and avoid placing vendors and their workers in potential jeopardy.

FEMA also does not concur with the proposed corrective action: "*The Fermi 2 Public Information Brochure will be revised to delete any ties between emergency classification levels and specific required actions.*" To the contrary, specific actions are required under NUREG-0654 and FEMA and FDA guidance and the brochure should continue to reflect these requirements.

**Recommendation for Corrective Action:** The State of Michigan should follow its plans by appropriately implementing FDA guidance and revising plans, procedures and public information brochures, and providing additional training to state and local emergency response personnel regarding plan/brochure changes and implementing procedures.

**Schedule of Corrective Actions:** Criterion 2.b.2 should be redemonstrated during the Fermi 2 REP Exercise scheduled for June 6, 2006.

- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **1.3 Technical Support Group**

- a. **MET: Criteria 1.e.1; 2.a.1; 2.b.1; and 2.b.2**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **1.4 Dosimetry/Potassium (KI) Distribution, Michigan State Police Emergency Management Division**

- a. **MET: Criterion 1.e.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **1.5 Joint Public Information Center**

- a. **MET: Criteria 1.c.1; 1.d.1; and 1.e.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: 5.b.1**

**Issue No: 23-04-5.b.1-A-02**

**Condition:** Two of the three press releases issued by the JPIC contained incomplete or inconsistent information.

**Possible Cause:** Although each press release was reviewed by all the PIOs represented in the JPIC, there were several instances where incomplete or inaccurate information was contained in the release. The second press release, page 2, Agriculture, references attachment 1 for a description of Areas 1 through 5. However, Attachment 1 is the description of the evacuation areas as referenced on page 1. In addition, there is no attachment to describe the 5 areas. Furthermore, under Food and Feed facilities, page 2 references areas 1, 2, and 3. However, at the time of the press release, it should have been areas 1 and 2.

The third press release had similar inconsistencies. Page 1 references Attachment 1 for a description of the evacuated areas (1, 2, 3, and 4); page 2 also references Attachment 1 for a description of the Agricultural Advisories. However, there is no Attachment 1 with this release. The one attachment that has landmark descriptions is identified as Attachment 3. Furthermore, the Food and Feed facilities advisory did not include area 4, although that area was evacuated and was included in the dairy portion of the advisory, and was briefed.

**Reference:** NUREG-0654, E.7

**Effect:** The inconsistent information could be confusing to the public and to the media in understanding which areas are affected by the Agricultural Advisory.

**Recommendation:** Provide further training to JPIC Staff to ensure that all information contained is accurate and that all appropriate attachments are contained in press releases.

**Schedule of Corrective Actions:** Further training will be provided to ensure that all information contained in press releases is accurate and that all appropriate attachments are contained in press releases.

This issue will be addressed during the Palisades REP Exercise on August 17, 2004.

- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

**1.6 Michigan State Police  
Traffic Control Point/Access Control Point**

- a. **MET:** Criteria 1.d.1; 1.e.1; 3.a.1; 3.b.1; and 3.d.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES - RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

**1.7 DEQ - Evacuee and Vehicle Monitoring and Decontamination,  
Whiteford High School – Monroe County**

- a. **MET:** Criteria 3.a.1 and 6.a.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

**1.8 DEQ - Evacuee and Vehicle Monitoring and Decontamination,  
Taylor Center High School – Wayne County**

- a. **MET:** Criteria 3.a.1 and 6.a.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

**1.9 DEQ – Emergency Worker (EW)/Vehicle Monitoring and Decontamination, County Fair Grounds – Monroe County**

- a. MET: Criteria 3.a.1; 6.a.1; and 6.b.1
- b. DEFICIENCY: NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

**1.10 DEQ –EW/Vehicle Monitoring and Decontamination, Brownstone Fire Station #4 – Wayne County**

- a. MET: Criteria 3.a.1; 6.a.1; and 6.b.1
- b. DEFICIENCY: NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE
- e. PRIOR ISSUES – RESOLVED: NONE
- f. PRIOR ISSUES – UNRESOLVED: NONE

**2. RISK COUNTIES**

**2.1 MONROE COUNTY**

**2.1.1 Initial Notification Point**

- a. MET: Criteria 1.a.1 and 1.d.1
- b. DEFICIENCY: NONE
- c. AREAS REQUIRING CORRECTIVE ACTION: NONE
- d. NOT DEMONSTRATED: NONE

- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **2.1.2 Emergency Operations Center**

- a. **MET: Criteria 1.a.1; 1.c.1; 1.d.1; 1.e.1; 2.c.1; 3.a.1; 3.b.1; 3.c.1; 3.c.2; 3.d.1; 3.d.2; 5.a.1; and 5.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **2.1.3 Traffic and Access Control Point**

- a. **MET: Criteria 1.d.1; 1.e.1; 3.a.1; 3.b.1; and 3.d.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **2.1.4 Joint Public Information Center, County Public Information Officer**

- a. **MET: Criterion 5.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**



## 2.1.5 Public Inquiry Hotline, Monroe Community College

- a. **MET: NONE**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: Criterion 5.b.1**

**Issue No.:** 23-02-5.b.1-A-01

**Condition:** The Public Inquiry Hotline (Emergency Information/Rumor Control Center) staff provided inaccurate or improper information to the public after confusing a Utility Protective Action Recommendation (PAR) with a State PAO. In addition, they advised people that they could enter an area that had been evacuated, under a PAO, to retrieve personnel goods and relatives, but that the police probably would stop them.

**Possible Cause:** Some of the members of the Public Inquiry Hotline staff do not understand the difference between a Utility PAR and a State PAO. Nor do they understand the implications of a PAO, and the need not to enter an evacuate area in the context of a radiological emergency.

**Reference:** NUREG-0654, G.4.c

**Effect:** Members of the public were instructed that they could enter an area that had been designated for evacuation.

**Recommendation:** The Public Inquiry Hotline staff should receive training that adequately addresses the difference between a Utility PAR and State PAO in the context of a radiological emergency.

**Schedule of Corrective Actions:** Public Inquiry Hotline staff will be trained on the difference between a protective action order from the Governor and recommendations issued by the utility. Training will also include proper instructions to provide to members of the public seeking to retrieve personal goods and relatives. This criterion will be demonstrated during the next biennial exercise.

**Reason Previous ARCA Unresolved:** The Public Inquiry Hotline staff provided

inaccurate information to the public regarding the release of iodine.

**Corrective Action Recommendation:** The Public Inquiry Hotline should make better use of visual aids (status boards, whiteboards, etc.) so that the staff can readily determine when key events have occurred that may affect the public's response to PAOs. Re-demonstrate this criterion during the next biennial exercise.

**Schedule of Corrective Actions:** Visual aids will be developed by December 1, 2004, so that staff can readily determine key events have occurred that may affect the public's response to protective actions. This will be demonstrated in the next Fermi 2 REP Exercise on June 6, 2006.

### **2.1.6 Protective Actions for School Children – EV-2, Monroe Public Schools**

- a. **MET:** Criteria 1.e.1; and 3.c.2
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

### **2.1.7 Dosimetry/KI Distribution, Monroe County Health Department**

- a. **MET:** Criteria 1.e.1; 3.a.1; and 3.b.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

### **2.1.8 Evacuee Monitoring and Decontamination, Whiteford High School**

- a. **MET:** Criteria 3.a.1 and 6.a.1

- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.1.9 Evacuee Vehicle Monitoring and Decontamination, Whiteford High School**

- a. **MET: Criterion 6.a.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES UNRESOLVED: NONE**

**2.1.10 Emergency Worker/Vehicle Monitoring and Decontamination, County Fair Grounds**

- a. **MET: Criteria 3.a.1; 6.a.1; and 6.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.1.11 Public Reception, Whiteford High School**

- a. **MET: Criterion 6.a.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**

- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **2.1.12 Congregate Care, Whiteford High School**

- a. **MET: Criterion 6.c.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

## **2.2 WAYNE COUNTY**

### **2.2.1 Initial Notification Point**

- a. **MET: Criteria 1.a.1 and 1.d.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

### **2.2.2 Emergency Operations Center**

- a. **MET: Criteria 1.a.1; 1.c.1; 1.d.1; 1.e.1; 2.c.1; 3.a.1; 3.b.1; 3.c.1; 3.c.2; 3.d.1; 3.d.2; and 5.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**

- e. **PRIOR ISSUES – RESOLVED:** None
- f. **PRIOR ISSUES – UNRESOLVED:** Criterion 5.a.1

**Issue No:** 23-02-5.a.1-A-02

**Condition:** The Emergency Alert System (EAS) messages, simulated broadcast at 1039 hours and 1305 hours by Wayne County, were in conflict with the Governor’s PAOs. The EAS messages instructed the general public to “evacuate immediately”, and at the same time instructed farmers to stay behind and “shelter their animals and provide stored feed and water”. The State of Michigan Department of Agriculture had decided not to issue a Livestock Agriculture Advisory because the Governor had issued a PAO to evacuate persons from the affected areas.

**Possible Cause:** The Michigan Department of Agriculture procedures were modified to indicate that if an evacuation PAO was imminent or issued by the State, a Livestock Agriculture Advisory would not be issued. When the Department of Agriculture procedures changed, the EAS Evacuation Orders within the Wayne County procedures were not updated to reflect the changes.

**Reference:** NUREG-0654, J.9, 10.m

**Effect:** The EAS Evacuation Orders conflicted with the State’s PAOs. They instructed the general public to evacuate, but instructed farmers to stay behind and tend to their animals.

**Recommendation:** The animal advisory, contained within Wayne County’s EAS Evacuation Orders, should be removed. Consideration should be given to drafting a separate, stand alone, Livestock Agriculture Advisory that could be disseminated as a news release.

**Schedule of Corrective Actions:** Wayne County and the State of Michigan agree with the logic of the issue cited. Generic EAS language on placing milk animals within 10 miles on stored feed and water will be deleted. Future agricultural advisories will be issued separate and apart from Governor’s PAOs. This criterion will be demonstrated during the next biennial exercise.

**Reason Previous ARCA Unresolved:** In the prior ARCA, “The EAS Evacuation Orders conflicted with the State’s PAOs. They instructed the general public to evacuate, while at the same time instructing farmers to stay behind and tend to their animals.” Wayne County and the State of Michigan agreed to issue Agriculture Advisories separately from PAOs, but both EAS messages issued during the March 23, 2004, exercise contained the following statement: “Farmers affected by this order should shelter their animals and provide stored feed and water,” thus leaving the ARCA unresolved.

**Corrective Action Recommendation:** Remove generic Agriculture Advisory information from prescribed EAS messages. Issue Agriculture Advisories separate and apart from the Governor's PAOs. Re-demonstrate this criterion during the next biennial exercise.

**Schedule of Corrective Actions:** All generic, agricultural, advisory information will be removed from prescribed EAS messages by July 1, 2004. This will be demonstrated in the next Fermi 2 REP Exercise on June 6, 2006.

### **2.2.3 Traffic and Access Control Point**

- a. **MET:** Criteria 1.d.1; 3.a.1; 3.b.1; and 3.d.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

### **2.2.4 Joint Public Information Center, County Public Information Officer**

- a. **MET:** Criterion 5.b.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE
- d. **NOT DEMONSTRATED:** NONE
- e. **PRIOR ISSUES – RESOLVED:** NONE
- f. **PRIOR ISSUES – UNRESOLVED:** NONE

### **2.2.5 Emergency Alert System Radio Station, WJR**

- a. **MET:** Criterion 5.a.1
- b. **DEFICIENCY:** NONE
- c. **AREAS REQUIRING CORRECTIVE ACTION:** NONE

- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.6 Protective Actions for School Children – EV-2, Gibraltar Schools**

- a. **MET: Criteria 1.e.1; and 3.c.2**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.7 Dosimetry/KI Distribution, Brownstone Fire Station #4**

- a. **MET: Criteria 1.e.1; 3.a.1; and 3.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**
- e. **PRIOR ISSUES – RESOLVED: NONE**
- f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.8 Emergency Worker/Vehicle Monitoring and Decontamination, Brownstone Fire Station #4**

- a. **MET: Criteria 6.a.1; and 6.b.1**
- b. **DEFICIENCY: NONE**
- c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**
- d. **NOT DEMONSTRATED: NONE**

e. **PRIOR ISSUES – RESOLVED: NONE**

f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.9 Evacuee Monitoring and Decontamination,  
Taylor Center High School**

a. **MET: Criteria 3.a.1; and 6.a.1**

b. **DEFICIENCY: NONE**

c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**

d. **NOT DEMONSTRATED: NONE**

e. **PRIOR ISSUES – RESOLVED: NONE**

f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.10 Evacuee Vehicle Monitoring and Decontamination,  
Taylor Center High School**

a. **MET: Criterion 6.a.1**

b. **DEFICIENCY: NONE**

c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**

d. **NOT DEMONSTRATED: NONE**

e. **PRIOR ISSUES – RESOLVED: NONE**

f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.11 Public Reception, Taylor Center High School**

a. **MET: Criterion 6.a.1**

b. **DEFICIENCY: NONE**

c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**

d. **NOT DEMONSTRATED: NONE**

e. **PRIOR ISSUES – RESOLVED: NONE**



f. **PRIOR ISSUES – UNRESOLVED: NONE**

**2.2.12. Congregate Care, Taylor Center Middle School**

a. **MET: Criterion 6.c.1**

b. **DEFICIENCY: NONE**

c. **AREAS REQUIRING CORRECTIVE ACTION: NONE**

d. **NOT DEMONSTRATED: NONE**

e. **PRIOR ISSUES – RESOLVED: NONE**

f. **PRIOR ISSUES – UNRESOLVED: NONE**

## APPENDIX 1

### ACRONYMS AND ABBREVIATIONS

The following is a list of the acronyms and abbreviations that were used in this report and the REP Program.

ACP	Access Control Point
ALARA	As Low As Reasonable Achievable
ARCA	Area Requiring Corrective Action
CFR	Code of Federal Regulations
cpm	counts per minute
DEQ	Department of Environmental Quality
EAS	Emergency Alert System
EMD	Emergency Management Division
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EPZ	Emergency Planning Zone
EW	Emergency Worker
FEMA	Federal Emergency Management Agency
FIA	Family Independence Agency
FTC	Field Team Center
HP	Health Physics or Health Physicist
HS	High School
ICF	ICF Consulting
JPIC	Joint Public Information Center
KI	Potassium Iodide
M&D	Monitoring and Decontamination
mR	milliRoentgen
mR/hr	milliRoentgen per Hour
MS-1	Medical Services Drill
MSP	Michigan State Police
N/A	Not Applicable
NRC	U.S. Nuclear Regulatory Commission
NUREG-0654	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.

ORO	Off-site Response Organization
OSC	Operational Support Center
PAO	Protective Action Order
PAR	Protective Action Recommendation
R	Roentgen
R/hr	Roentgen per hour
RAC	Regional Assistance Committee
RACES	Radio Amateur Civil Emergency Services
RASCAL	Radiological Assessment System for Consequence Analysis
RCP	Reactor Coolant Pump
RCS	Reactor Coolant System
REA	Radiation Emergency Area
rem	Roentgen Equivalent Man
REP	Radiological Emergency Preparedness
RERP	Radiological Emergency Response Plan
SEOC	State Emergency Operations Center
SGTS	Standby Gas Treatment System
T/L	Team Leader
TCP/ACP	Traffic and Access Control Point
TSC	Technical Support Center

## APPENDIX 2

### EXERCISE EVALUATORS AND TEAM LEADERS

The following is a list of the personnel who evaluated the Enrico Fermi 2 Nuclear Power Plant exercise on March 23, 2003. Evaluator Team Leaders are indicated by the letters “(TL)” after their names. The organization which each evaluator represents is indicated by the following abbreviations:

FEMA	Federal Emergency Management Agency
ICF	ICF Consulting

<u>TITLE</u>	<u>NAME</u>	<u>ORGANIZATION</u>
Exercise Director	William King	FEMA
<b><u>EVALUATION SITE</u></b>	<b><u>EVALUATOR</u></b>	<b><u>ORGANIZATION</u></b>
<b>STATE OF MICHIGAN</b>		
Initial Notification Point	Clinton Crackel	FEMA
Emergency Operations Center	Gary Naskrent (TL) Clinton Crackel	FEMA FEMA
Technical Support	Richard Grundstrom	ICF
Dosimetry/KI Distribution	Richard Grundstrom	ICF
Joint Public Information Center	Jane Young	FEMA
Michigan State Police, TCP/ACP	Seth Kelly	ICF
DEQ – Evacuee & Vehicle Monitoring and Decontamination, Whiteford HS – Monroe County	Patrick Taylor	ICF
DEQ – Evacuee & Vehicle Monitoring and Decontamination, Taylor Center HS – Wayne County	Patrick Taylor	ICF
DEQ - Emergency Worker & Vehicles Monitoring and Decontamination, County Fair Grounds- Monroe County	Rowena Argall	ICF

DEQ - Emergency Worker & Vehicles Monitoring and Decontamination, Brownstone Fire Station #4- Wayne County	Rowena Argall	ICF
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**MONROE COUNTY**

Initial Notification Point	Cleven Lloyd	FEMA
Emergency Operations Center	Terri Connors-Hartman (TL) Cleven Lloyd Robert Rospenda	FEMA FEMA ICF
Traffic & Access Control Point	Lawrence Visniesky	ICF
Joint Public Information Center, County Public Information Officer	Jayne Young	FEMA
Public Inquiry Hotline	William Vocke	ICF
Protective Actions for School Children – EV 2, Monroe Public Schools	William Vocke	ICF
Dosimetry/KI Distribution	Seth Kelly	ICF
Evacuee Monitoring and Decontamination, Bedford HS	Carol Herzenberg Eddie Fuente	ICF ICF
Evacuee Vehicle Monitoring and Decontamination, Whiteford HS	William Vocke	ICF
Public Reception, Bedford HS	Carl McCoy	ICF
Congregate Care, Bedford HS	Carl McCoy	ICF
Emergency Worker & Vehicle Monitoring and Decontamination, Monroe County Fair Grounds	William Vocke Patrick Taylor	ICF ICF

**WAYNE COUNTY**

Initial Notification Point	Robert Fernandezl	ICF
Emergency Operations Center	Carl Bebrich (TL) Kevin Keyes Robert Fernandez	FEMA FEMA ICF
Traffic & Access Control Point	Carl McCoy	ICF
Joint Public Information Center, County Public Information Officer	Jane Young	FEMA
Emergency Alert System Radio Station - WJR	Patrick Taylor	ICF
Protective Actions for School Children - EV2, Gibraltar Schools	Lawrence Visniesky	ICF
Dosimetry Distribution	Jon Fox	ICF
Emergency Worker & Vehicle Monitoring and Decontamination, Brownstone Fire Station #4	Jon Fox Rowena Argall	ICF ICF
Evacuee Monitoring and Decontamination, Taylor Center HS	Jon Fox Patrick Taylor	ICF ICF
Evacuee Vehicle Monitoring and Decontamination, Taylor Center HS	Edward Wojnas	ICF
Public Reception, Taylor Center HS	Jane Young	FEMA
Congregate Care, Bedford HS	Jane Young	FEMA

## APPENDIX 3

### EXERCISE CRITERIA AND EXTENT-OF-PLAY AGREEMENT

This appendix lists the exercise criteria that were scheduled for demonstration in the Enrico Fermi 2 Nuclear Power Plant exercise on March 23, 2004, and the off-site extent-of-play agreement approved by FEMA Region V on January 15, 2004.

The exercise criteria, contained in FEMA "Radiological Emergency Preparedness Exercise Evaluation Methodology" as published in the Federal Register Notice/Vol. 67, No 80, dated April 25, 2002, represent a functional translation of the planning standards and evaluation criteria of NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for the Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November 1980.

Because the exercise criteria are intended for use at all nuclear power plant sites, and because of variations among off-site plans and procedures, an extent-of-play agreement is prepared by the State and approved by FEMA to provide evaluators with guidance on expected actual demonstration of the criteria.

#### A. Exercise Criteria and Extent-of-Play

Listed below are the specific REP criteria scheduled for demonstration during this exercise.

# ENRICO FERMI 2 NUCLEAR POWER PLANT EXERCISE

March 23, 2004

## Extent Of Play Agreements for Monroe County, Wayne County, and the State of Michigan

### Enrico Fermi 2 Exercise Objectives

#### 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) will be fully activated. State personnel will be mobilized in accordance with procedures with the exception of personnel reporting to the Monroe and Wayne County EOCs and the JPIC. State personnel reporting to the Monroe and Wayne Counties EOC will be pre-positioned at the State Police 2nd District Headquarters and will report when mobilized by the SEOC. State personnel reporting to the JPIC will begin participation 30 minutes after the arrival of Monroe County JPIC personnel. The Field Team Center and associated personnel will not be demonstrated for this exercise. A cell will be established to initiate exercise data inputs for SEOC players. Personnel involved in out of sequence demonstrations will be prestaged. A roster will be provided to demonstrate 24-hour staffing.

The Monroe and Wayne County EOCs will be fully activated. Personnel will be mobilized in accordance with procedures, including those responding to the JPIC. Personnel involved in out of sequence demonstrations will be pre-positioned. Rosters will be provided to demonstrate 24-hour staffing.

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

This objective was demonstrated by Monroe and Wayne Counties on March 23, 2004. The SEOC was demonstrated during the Palisades exercise on June 4, 2002. Both County and the State EOCs is permanently set-up. The JPIC, which was demonstrated on March 23, 2004, will be set-up during the evening of March 22. Setup time will be provided in the table of out of sequence demonstrations to allow evaluation by FEMA.

**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.

This criterion will be demonstrated at county EOCs, the SEOC, and in all out of sequence demonstrations.



**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.

This criterion will be demonstrated at the SEOC, Monroe and Wayne County EOCs, and the JPIC. If both the primary and back-up systems fail, this objective may be demonstrated by successful use of an alternate method of communication.

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

Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the SEOC, JPIC, and Monroe and Wayne County EOCs. Personnel demonstrating traffic and access control points will demonstrate knowledge of where to secure traffic control equipment. The FTC will not be demonstrated. Potassium iodide and dosimetry are stored at the Monroe County Health Department, Wayne County EOC, and at the MSP/EMD office in Lansing. Monroe County will provide dosimetry/KI records and give briefings at the Emergency Worker Decontamination Center demonstration on March 23. The Michigan Department of Environmental Quality also maintains supplies of potassium iodide and dosimetry for use by its personnel. Documentation related to KI shelf life extension is maintained by MSP/EMD and will be provided to FEMA for review.

## **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 by the SEOC. Authorization to exceed state exposure limits will be demonstrated. If the scenario does not provide an opportunity to demonstrate these items, a controller inject will be issued to demonstrate the ability to perform these actions.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**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 Technical Support Group in the SEOC will evaluate licensee and FTC Cell provided information and complete an independent analysis of scenario data. Dose assessment evaluation will be conducted via interview with the individual performing the FTC Cell role at the MSP/EMD office in Lansing.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

This criterion does not apply to Monroe and Wayne Counties.

**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 will be demonstrated by the Executive Group in the SEOC in conjunction with applicable support staff.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

This criterion does not apply to Monroe and Wayne Counties.

**Criterion 2.c.1:** Protective action decisions are made, as appropriate, for special population groups.

This criterion will be demonstrated by the Executive Group in the SEOC in conjunction with applicable support staff through the decision to recommend the use of KI to institutionalized persons.

Lists of transportation dependent and special needs populations are kept by Monroe and Wayne Counties. No personnel will be moved. Equipment lists and rosters will be available in the Monroe and Wayne County EOCs. No phone calls to transportation dependent persons will be made.

The School Services Representatives in the Monroe and Wayne County EOCs will make phone contact with affected school districts if schools are in session. No scenario information will be discussed during these calls.

**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 will not be demonstrated during this exercise.

**Criterion 2.e.1:** Timely 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 not be demonstrated during this exercise.

### **Evaluation Area 3 - Protective Action Implementation**

**Criterion 3.a.1:** The OROs issue appropriate dosimetry 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.

This criterion will be demonstrated by the State of Michigan, Monroe County, and Wayne County during out of sequence reception center, decontamination center, and access control demonstrations when dosimetry is issued for use by emergency workers. The Monroe County and State of Michigan demonstrations will be initiated by the Monroe County briefing on use of KI and dosimetry. The individual serving as the FTC Cell will demonstrate knowledge of State distribution and use of dosimetry and potassium iodide.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**Criterion 3.b.1:** KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals (not the general public) is maintained.

This criterion will be demonstrated during the traffic and access control demonstrations for Monroe and Wayne Counties and the State of Michigan. Dosimetry and KI for the State demonstration will be pre-staged since the Field Team Center is not being demonstrated for this exercise. Response personnel will demonstrate knowledge of when it is appropriate to take KI, but not actually ingest KI.

KI will be distributed to emergency workers in Monroe and Wayne Counties along with their dosimetry. The State will demonstrate this objective through decision-making and orders to the counties to implement appropriate Protective Action Orders.

**Criterion 3.c.1:** Protective action decisions are implemented for special population groups within areas subject to protective actions.

This criterion will be demonstrated in the Monroe and Wayne County EOCs via EOC staff discussions which may include evacuation of hospitals, nursing homes, correctional facilities, mobility impaired individuals, and transportation dependent. These discussions will be documented in situation logs. Actual contacts to special population groups will not be made. Monroe and Wayne Counties will contact a minimum of four providers of transportation services which may include a public transit authorities, school systems for buses, ambulance services, or a fire/rescue services. An attempt will be made to contact a third of the total number of transportation providers. There will be no discussion of scenario information during these calls.

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

This criterion will be demonstrated in the Monroe and Wayne County EOCs as driven by the scenario. If schools are not in session, the FEMA evaluator will conduct an interview with the schools representative in the Monroe/Wayne County EOC.

An EV-2 interview will be conducted in Monroe and Wayne Counties. Refer to the Table of Exercise Demonstrations for specific times and locations.

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

Decisions related to traffic and access control will be demonstrated in the Monroe and Wayne County EOCs. Monroe County, Wayne County, and the State of Michigan will demonstrate one traffic and access control point each. Demonstration locations will be determined during the exercise at a time agreed upon by the FEMA evaluator, the State Controller, and the county emergency management coordinator. Staffing of the all other access and traffic control points will be simulated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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

This will be demonstrated through discussions at the Monroe and Wayne County EOCs. Messages will be injected by the State Controller to drive this demonstration. Personnel will deal with the impediments by discussing the need for equipment, discussing its estimated time of arrival, etc. The State of Michigan will not demonstrate this objective. If the impediment posed involves road closures that would have been known to exercise participants during the course of normal operations, this information will be provided to the players as part of the initial conditions for the exercise. All contacts, actual or simulated will be logged.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**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 not be demonstrated during this exercise.

**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 not be demonstrated during this exercise.

**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 will not be demonstrated during this exercise.

**Evaluation Area 4 - Field Measurement and Analysis**

**Criterion 4.a.1:** The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates.

This criterion will not be demonstrated during this exercise.

**Criterion 4.a.2:** Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

This criterion will not be demonstrated during this 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 not be demonstrated during this exercise.

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

This criterion will not be demonstrated during this exercise.

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

This criterion will not be demonstrated during this exercise.

**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 FEMA REP guidance.

The Monroe County Sheriff Department is the primary activation point for the public warning sirens. The Emergency Alert System is activated by Wayne County. To demonstrate this criterion, the State will provide information to Monroe and Wayne Counties for release in the Emergency Alert System messages. An interview with WJR personnel will be conducted by FEMA following transmittal of EAS messages.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**Criterion 5.a.2:** [RESERVED]

**Criterion 5.a.3:** 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. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system.

The Fermi 2 Plant EPZ does not contain any FEMA approved exception areas. If a siren failure occurs, Monroe and Wayne County EOCs will demonstrate actions to notify the public in areas where siren coverage is not adequate.

**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 JPIC via dissemination of Emergency Alert System announcements in coordination with the SEOC, Monroe County EOC, and Wayne County EOC. All media briefings will be conducted at the JPIC.

A public inquiry hotline will be operated by Monroe County during the exercise by personnel based at the JPIC. Trending is performed by the Rumor Control Coordinator, who identifies trends and ensures appropriate information is provided to the public inquiry operators and the JPIC for inclusion in press briefings.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**Evaluation Area 6 - Support Operation/Facilities**

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

Monroe and Wayne Counties will each fully demonstrate separate emergency worker and public reception/decontamination centers out-of sequence from the exercise. Personnel will not go through alert, mobilization, activation, or shift changes. State DEQ HP personnel will provide assistance as requested during these demonstrations. The public reception center will demonstrate 1/3 of the monitoring teams required to monitor 20% of the population allocated to that facility within a 12 hour time period. Each team will monitor six individuals. The State of Michigan Field Team Center is not being demonstrated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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

Monroe and Wayne Counties will each fully demonstrate an emergency worker/equipment decontamination center out of sequence with the exercise. Emergency vehicles will be monitored and decontaminated as appropriate. State DEQ HP personnel will provide assistance as requested during this demonstration. The State of Michigan Field Team Center is not being demonstrated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**Criterion 6.c.1:** Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross 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.

Monroe and Wayne Counties will each fully demonstrate a congregate care center out of sequence with the exercise. This facility will be set up in advance of the demonstration. Personnel manning the center will not go through alert, mobilization, activation, or shift changes.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**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 the MS-1 exercise on April 20, 2004.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

### **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) will be fully activated. State personnel will be mobilized in accordance with procedures with the exception of personnel reporting to local government EOCs and the JPIC, who will be pre-positioned. Pre-positioned personnel will begin participation following the Alert classification as directed by the State Controller in each facility. The Field Team Center and associated personnel will not be demonstrated for this exercise. A cell will be established to initiate exercise data inputs for SEOC players. Personnel involved in out-of-sequence demonstrations will be prestaged. A roster will be provided to demonstrate 24-hour staffing.

The Monroe and Wayne County EOCs will be fully activated. Personnel will be mobilized in accordance with procedures with the exception of those from Wayne County reporting to the JPIC, who will be pre-positioned. Pre-positioned personnel will begin participation no earlier than the Alert classification. Personnel involved in out-of-sequence demonstrations will be pre-positioned. Rosters will be provided to demonstrate 24-hour staffing.

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

This criterion will be demonstrated by Monroe County and Wayne County. The SEOC was demonstrated during the Palisades exercise on June 4, 2002. The State, Monroe County, and Wayne County EOCs are all set-up permanently. The JPIC will be set-up in advance of the 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.

This criterion will be demonstrated at the SEOC, Monroe County EOC, and the Wayne County EOC.



**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.

This criterion will be demonstrated at the SEOC, Monroe County EOC, the Wayne County EOC, and the JPIC.

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

Equipment, maps, displays, and other supplies will be demonstrated to support emergency operations at the SEOC, JPIC, Monroe County EOC, and the Wayne County EOC. The FTC will not be demonstrated. Potassium iodide and dosimetry are stored at the Health Department in Monroe County; at the Emergency Management Office and Brownstown Fire Station #4 in Wayne County; and at the MSP/EMD office in Lansing. The Michigan Department of Environmental Quality also maintains supplies of potassium iodide and dosimetry for use by its personnel.

## **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 by the SEOC. Authorization to exceed state exposure limits will be demonstrated as driven by the scenario.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**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 Technical Support Group in the SEOC will evaluate licensee and FTC Cell provided information and complete an independent analysis of scenario data. Dose assessment evaluation will be conducted via interview with the individual performing the FTC Cell role at the MSP/EMD office in Lansing.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

This criterion does not apply to Monroe and Wayne Counties.

**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 will be demonstrated by the Executive Group in the SEOC in conjunction with applicable support staff.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

This criterion does not apply to Monroe and Wayne Counties.

**Criterion 2.c.1:** Protective action decisions are made, as appropriate, for special population groups.

This criterion will be demonstrated by the Executive Group in the SEOC in conjunction with applicable support staff through the decision to recommend the use of KI to institutionalized persons, if applicable.

Lists of transportation dependent and special needs populations are kept by each county. No personnel will be moved. Equipment lists and rosters will be available in the Wayne and Monroe County EOCs. No phone calls to transportation dependent persons will be made.

**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 will not be demonstrated during this exercise.

**Criterion 2.e.1:** Timely 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 not be demonstrated during this exercise.

### **Evaluation Area 3 - Protective Action Implementation**

**Criterion 3.a.1:** The OROs issue appropriate dosimetry 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.

Issuance of dosimetry will be discussed during scheduled interviews, which may occur during the exercise. Refer to the Table of Exercise Demonstrations for specific times and locations.

This criterion will be demonstrated by the State of Michigan, Monroe County, and Wayne County during out-of-sequence reception and decontamination center demonstrations.

This criterion will be demonstrated during the traffic and access control demonstrations for Wayne County, Monroe County, and the State of Michigan. The briefing on dosimetry and KI use for the State of Michigan demonstration will be provided by the State Controller.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**Criterion 3.b.1:** KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals (not the general public) is maintained.

This criterion will be demonstrated during the traffic and access control demonstrations for Monroe County, Wayne County, and the State of Michigan. Dosimetry and KI for the State demonstration will be pre-staged since the Field Team Center is not being demonstrated for this exercise.

Simulated KI will be distributed to emergency workers in Wayne and Monroe Counties along with their dosimetry if driven by the scenario. The State will demonstrate this criterion through decision-making and orders to the counties to implement appropriate Protective Action Orders.

**Criterion 3.c.1:** Protective action decisions are implemented for special population groups within areas subject to protective actions.

This criterion will be demonstrated in the Monroe and Wayne County EOCs via EOC staff discussions, which may include evacuation of hospitals, nursing homes, correctional facilities, mobility impaired individuals, and transportation dependent. These discussions will be documented in situation logs. Actual contacts to special population groups will not be made. Each county will contact a minimum of four providers of transportation services, which may include a public transit authorities, school systems for buses, ambulance services, or a fire/rescue services. There will be no discussion of scenario information during these calls.

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

This criterion will be demonstrated in the Monroe and Wayne County EOCs as driven by the scenario.

EV-2 interviews will be conducted in Monroe and Wayne Counties. Refer to the Table of Exercise Demonstrations for specific times and locations.

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

Decisions related to traffic and access control will be demonstrated in the Monroe and Wayne County EOCs. Monroe County, Wayne County, and the State of Michigan will demonstrate one traffic and access control point. Monroe and Wayne County demonstration locations will be determined during the exercise at a time agreed upon by the FEMA evaluator, the State Controller, and the county emergency management coordinator. The State of Michigan demonstration will be initiated by a briefing from a State Controller and may be conducted out-of-sequence from the exercise. Staffing of the all other access and traffic control points will be simulated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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

This criterion will be demonstrated through discussions at the Monroe and Wayne County EOCs. Messages will be injected by the State Controller to drive this demonstration. Personnel will deal with the impediment by discussing the need for equipment, discussing its estimated time of arrival, etc. The State of Michigan will not demonstrate this criterion. If the impediment posed involves road closures that would have been known to exercise participants during the course of normal operations, this information will be provided to the players as part of the initial conditions for the exercise.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**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 not be demonstrated during this exercise.

**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 not be demonstrated during this exercise.

**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 will not be demonstrated during this exercise.

#### **Evaluation Area 4 - Field Measurement and Analysis**

**Criterion 4.a.1:** The field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates.

This criterion will not be demonstrated during this exercise.

**Criterion 4.a.2:** Field teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure.

This criterion will not be demonstrated during this 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 not be demonstrated during this exercise.

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

This criterion will not be demonstrated during this exercise.

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

This criterion will not be demonstrated during this exercise.

**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 FEMA REP guidance.

The Wayne County Sheriff's Department and Monroe County Sheriff's Department are the primary activation points for the public warning siren systems. The Emergency Alert System is activated by the Wayne County Sheriff Department for both counties. To demonstrate this criterion, the State will provide information to Monroe and Wayne Counties for release in the Emergency Alert System messages.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**Criterion 5.a.2:** [RESERVED]

**Criterion 5.a.3:** 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. Backup alert and notification of the public is completed within 45 minutes 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 Michigan, Monroe County, or Wayne County.

**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 JPIC via dissemination of Emergency Alert System announcements in coordination with the SEOC, Monroe County EOC, and Wayne County EOC. All media briefings will be conducted at the JPIC.

A public inquiry hotline will be operated by Monroe County during the exercise at the JPIC.

This criterion may be re-demonstrated as approved on a case-by-case basis by the Chair of the Regional Assistance Committee.

**Evaluation Area 6 - Support Operation/Facilities**

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

Wayne and Monroe Counties will each fully demonstrate separate emergency worker and public reception/decontamination centers during out-of-sequence demonstrations. Personnel will not go through alert, mobilization, activation, or shift changes. State DEQ HP personnel will provide assistance as requested during Monroe and Wayne County demonstrations. Public reception centers will demonstrate the ability to screen 1/3 of the monitoring teams required to monitor 20% of the population allocated to that facility within a 12 hour time period. The State of Michigan Field Team Center is not being demonstrated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

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

Wayne and Monroe Counties will each fully demonstrate an emergency worker decontamination center out-of-sequence with the exercise. Emergency vehicles will be monitored and decontaminated as appropriate. State DEQ HP personnel will provide assistance as requested during Monroe and Wayne County demonstrations. The State of Michigan Field Team Center is not being demonstrated.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**Criterion 6.c.1:** Managers of congregate care facilities demonstrate that the centers have resources to provide services and accommodations consistent with American Red Cross 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.

Wayne and Monroe Counties will each fully demonstrate a congregate care center out-of-sequence with the exercise. Personnel manning the centers will not go through alert, mobilization, activation, or shift changes.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.

**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 was demonstrated during the Medical Services (MS-1) Drill on March 6, 2002.

This criterion may be re-demonstrated immediately for credit, at the discretion of the evaluator.