ANNEX A: GUIDANCE FOR DEVELOPING PANDEMIC RESPONSE PROCEDURES

A-1   Purpose

This Annex provides guidance for the staff in developing Office-specific and Regional procedures for implementing the Pandemic Priority Functions (PPFs) called for in Table 1 of the Pandemic Response Plan. It provides the rationale and bases underpinning the PPFs and Job Tasks and clarifies certain areas that are expected to be covered by Office and Regional procedures.

A-2   Applicability and Scope

The Pandemic Response Plan responds to the requirement for the U.S. Nuclear Regulatory Commission (NRC) to implement the *National Strategy for Pandemic Influenza* and associated *Implementation Plan.* This procedure provides the NRC's comprehensive program to ensure the survival of its national-level essential functions under circumstances and hazards associated with an influenza pandemic. This procedure supports the Federal policy expressed in Presidential Decision Directive (PDD) 67 and *Federal Preparedness Circular - 65, Federal Executive Branch Continuity of Operations* (FPC-65).

The Federal Government recommends that Government entities and the private sector plan with the assumption that up to 40 percent of their staff may be absent for periods of about 2 weeks at the height of a pandemic wave with lower levels of absenteeism for a few weeks on either side of the peak. The absences may be due to employees who care for the ill, are under voluntary home quarantine due to an ill household member, care for children dismissed from school, feel safer at home, or are ill or incapacitated by the virus. An unfortunate but possible outcome may be that some employees do not recover and never return to work.

The NRC procedure is directed toward maintaining the continuation of essential PPFs while striving to ensure the maximum protection, health, well-being, and security of its employees and their families.

A-3   Objective

The primary objective of the Pandemic Response Plan and its accompanying Office and Regional level procedures is to ensure that the NRC can maintain and sustain PPFs under circumstances and hazards associated with an influenza pandemic.

A-4   Pandemic Response

These instructions ensure continuing capability for the NRC to maintain capability in the following pandemic priority function categories:

- Incident response
- Threat assessment and dissemination
- Pandemic-related communications
- Licensing
- Enforcement
- Inspection
- Enterprise support functions

These instructions provide a framework for maintaining PPFs during an influenza pandemic. Additional guidance may be provided by the Office of Personnel Management and/or other Federal departments and agencies as part of the *National Strategy for Pandemic Influenza* and associated *Implementation Plan.* Table 1 of the Pandemic Response Plan provides the NRC PPFs and support requirements.

A-4.1   Discussion

Within the pandemic priority function categories noted above are PPFs and job tasks. Many of the PPFs and job tasks can be coordinated so that a large portion of the NRC staff can work remotely using flexiplace/telework arrangements. NRC would strive to maintain Headquarters staffing for incident response and threat assessment and dissemination of PPFs.

NRC Offices will maintain procedures for implementing this Plan in the event that public health officials, the Federal Government, Commission, or other authorized NRC official were to declare a condition sufficient to warrant instituting pandemic controls. Office procedures will provide for delegations of authority, empowerment of decisionmaking and concurrence to cognizant manager and technical-level personnel, and identification of streamlining measures to support critical infrastructure safety and security. Procedures will note Office-level work that may be deferred, delayed, or cancelled. Procedures will also identify risk-significant safety and security issues in licensee operations that may need to be confirmed to ensure adequate public health and safety, security, and protection of the environment.

A-4.2   Office and Regional Procedures

Each Office and Region, according to their roles and responsibilities, will develop and implement procedures to address the following:

- Identification of personnel to perform Table 1 PPFs and Job Tasks
- Orders of succession, delegation of authority, devolution, and reconstitution plans
- Personnel accountability and availability status tracking
- Criteria for decisionmaking at the appropriate level (e.g., Branch/Section Chief, PM)
- Issues that may require urgent approvals/relief to maintain critical infrastructure (e.g., sustaining electric generation, licensing of medical users)
- Identification of categories of work that can be delayed, deferred, or canceled
- Pre-planned actions to confirm the safety and security of licensed activities and materials
- Records management for remote decisionmaking and information security controls
- Agency records and databases necessary for enhancing telework capability
- Training on procedures and hygiene practices and "clean" room procedures

A-4.2.1   Incident Response

Most of the functions in this category can be accomplished through implementation of NUREG-0728, "NRC Incident Response Plan." For reactors and materials safety and safeguards, this would require ensuring the following PPFs: Headquarters Operations Officer (HOO) and Headquarters Emergency Response Officer coverage of the Headquarters Operations Center (HOC); Headquarters and Regional event screening; establish Headquarters and Regional incident response teams; support international incident response, Department of Homeland Security (DHS) joint field Office or NRC site team, and remote COOP, as appropriate.

A-4.2.2   Threat Assessment and Dissemination

Because of the sensitivity of information to common defense and security, NRC threat assessment and dissemination will be conducted in Headquarters facilities under pandemic conditions. If an incident requiring activation of the COOP Plan occurs, this function will be handled in accordance with the COOP Plan.

A-4.2.3   Pandemic-Related Communications

Pandemic-related communications would involve maintaining communications with NRC staff; Congress; Federal departments and agencies; State, local, and Native American Tribal governments; media; and public entities. This would involve communications for both normal operations and the status of emergency conditions.

A-4.2.4   Licensing

NRC licensing will be directed toward maintaining safety and security while enabling use of critical infrastructure to provide essential services. Office and Regional licensing personnel will prioritize certain licensing actions and allow for more flexible licensing review and approval including exemption alternatives and relief requests, allowance for import /export, and support interests of National defense. Some routine licensing work may be deferred, delayed or cancelled.

A-4.2.5   Enforcement

Enforcement procedures will be modified to provide for safety and security along with flexibility and efficiency in the review and approval of urgent actions that may require Notices of Enforcement Discretion (NOEDs), relief from licensing conditions and regulations, Orders, and enhanced consideration for compensatory measures in emergency situations.

A-4.2.6   Inspection

NRC inspection will be directed toward risk-significant safety, and security issues. Office and Regional inspection programs will focus primarily on emergent and/or imminent safety and security events, verification of licensee oversight of facilities and materials of concern, and licensee preparedness to maintain safety and security and respond to pandemic conditions. Some routine inspection work may be deferred, delayed or cancelled. Confirmation of many licensed activities and materials may have to be verified remotely and confirmed after the pandemic threat has subsided.

A-4.2.7   Enterprise Support Functions

A wide range of enterprise support functions are needed to maintain continuing operations of NRC PPFs. A substantial portion of the staff may be working remotely and will require logistics support that is separate, redundant, and diverse. Investment will be made over a period of years to increase the agency-wide capability for broader flexiplace/telecommuting. NRC will identify the necessary capabilities and resources to achieve the high-level job tasks and develop budget proposals to provide the capability.

A-4.3   Ongoing Operations

Once a pandemic condition has been declared, provisions should be made to brief the Commission and the NRC staff on a regular basis. Consideration should also be given to providing routine updates to the Regions, by routine conference status calls with Regional

Administrators or e-mail updates. The HOC will normally serve as the central location for communicating and coordinating agency-level decisionmaking when direct, commercial communications media are unavailable.   The HOC will also serve as the focus for coordinating interagency activities in accordance with the National Response Plan and National Infrastructure Protection Plan. Consideration should be given to notifying licensees, States, and other Federal departments and agencies concerning the status of NRC operations and that licensed activities.

NRC Offices and Regions will have procedures and logistics to support decisionmaking with a large contingency of staff (600 to 1,000 or more) on flexiplace at remote work locations. Delegations of authority will reflect plans for continued operations during degraded pandemic conditions. The focus will be on emergent and/or imminent safety and security events, verification of licensee oversight of facilities and materials of concern, and licensee preparedness to handle and respond to pandemic conditions. Some routine inspection and licensing work may be deferred, delayed or cancelled.
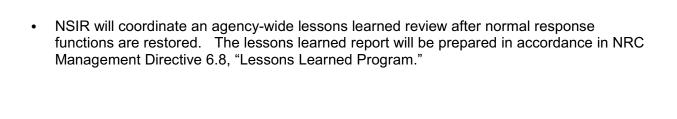
Regional procedures will provide mechanisms for the Regions to support each other under circumstances and hazards associated with pandemic influenza. Regions will collaborate to alleviate the degraded conditions that prevent them from carrying out their PPFs. Headquarters and other Regions will provide support to the affected Regional Office upon request by the Regional Administrator, or designee. Support may be partial or a full transfer of responsibility. Partial transfer may be needed to address challenges associated with addressing multiple events or pandemic impacts at licensed facilities and/or for material control.

A-4.4   Terminating Pandemic Response/Restoring Functions

The NRC Chairman, or designee (typically a member of the Commission), will confer with DHS and Health and Human Services (HHS) on cessation of influenza pandemic and preparations for restoring normal operations to Federal departments and agencies. The Commission, EDO, Office Directors, Regional Administrators, or their designated representatives, will collaborate on the steps to be taken to restore operation, in whole or in part, to NRC Headquarters and/or Regions. Once this decision has been made, Headquarters and the Region staff may proceed with restoration. Typically, Region and Headquarters managers will jointly verify the actions necessary to restore normal operations. Annex I, "Reconstitution Procedure," identifies steps that management would normally consider in making the determination that Headquarters and/or Regions are functional and can be returned to full operation.

Certain actions may include the following:

- NSIR will notify Headquarters and Regional Duty Officers that normal functions have been restored. Licensees, states, and other Federal departments and agencies will be notified, as appropriate. Notification to any outside parties will be coordinated through the HOC and approved by management.

- Office Directors and Regional Administrators, or their designated representatives, will notify the EDO that normal operations have been restored and the level of staffing that remains unavailable.

- The EDO will notify the Commission when the agreed upon deactivation actions have been completed.

- NSIR will coordinate an agency-wide lessons learned review after normal response functions are restored.   The lessons learned report will be prepared in accordance in NRC Management Directive 6.8, "Lessons Learned Program."

ANNEX B: PANDEMIC PREPAREDNESS ROLES AND RESPONSIBILITIES

B-1   Purpose

This Annex summarizes tasks described in the Pandemic Response Plan to assist Offices with preparations for a pandemic emergency, and tasks described in the Plan to assist the Pandemic Executive Team (PET) in managing the response.

B-2   Applicability and Scope

This Annex applies to NRC management and staff.

B-3   Objectives

Section B-4 lists tasks that are described further in the referenced sections of the Plan that should be completed in preparation for a pandemic. Section B-5 lists concise statements of procedures for the PET, which will manage the response. The statements in B-5 are intended only as reminders of actions with which the PET is already familiar (from other emergency plans), so they are not described in more detail.

B-4   Responsibilities for Preparations for a Pandemic

Offices	Preparation Tasks	Plan / Annex Sections
ADM OIS	Ensure that contractor and staff support is prepared and authorized to help set up new computer programs to support unanticipated pandemic needs.	H-5
ADM Offices responsible for performing Pandemic Priority Functions (PPFs)	Procure equipment identified by Offices as necessary for pandemic preparations (such as medical or communications devices) and prepare for emergency procurements later.	6.3
ADM	The operating NRC facilities must be access-controlled and otherwise safe and secure. To the maximum extent feasible, there should be backup electrical power for lighting, support systems, security systems, ventilation, heating and air conditioning, and personal comfort as arranged by ADM in advance or by either ADM or the Regional Administrator during an emergency. ADM will arrange for the availability of temporary additional guard service and any other provisions that it deems essential for general physical security.	6.5
ADM OCFO HR OIS	Develop a process for reporting absentee rates throughout the NRC to senior agency managers	3.2

ADM HR	Prepare to maintain a suitable work environment: • Common area (e.g., elevators, stairwells, rest rooms, cafeterias) decontamination on a regular schedule to prevent and mitigate spreading of germs and virus. • Workspace decontamination in areas used by those who showed symptoms and left. • Screening for infection as employees, contractors, and suppliers arrive at the worksite and/or return following illness. • Physical security to prevent facility access by unscreened or infected individuals.	6.1
OCFO	Define the formats and common categories to be used for reporting budget information	8.1
OCFO	OCFO will provide for employee benefits in coordination with HR and government-wide plans and procedures.	6.5
HQ and Regions	Offices and Regions should fully reflect their pandemic response-related responsibilities in the annual Operating Plans, as appropriate, or in similar plans maintained for accountability. NSIR will also reflect pandemic response-related umbrella responsibilities (such as tests, training, and exercises) that are not included in other Office plans. (Pandemic-related activities are those required by this Plan but not also required by other emergency or contingency plans).	8.1 8.2
HQ and Regions	Office Directors should prepare a process for prioritizing Office functions that will be delayed, deferred, or cancelled when the NRC implements pandemic response procedures. Office Directors may choose to delay, defer, or cancel functions other than PPFs at one time, or in preplanned stages as absenteeism increases. If the conditions allow for gradual shedding of work, then appropriate processes and procedures will be made available to ensure operations are conducted in a controlled and predictable manner.	3.2
HQ and Regions	Current established procedures provide for NRC to assume jurisdiction if an Agreement State informs NRC that the State cannot fulfill its responsibility because of pandemic influenza and relinquishes its authority under 274b, or terminate its contract under Section 274i, back to NRC. NSIR and NMSS will assume responsibility for ensuring the protection of public health and safety and the environment. STP will pursue actions for the continuation of other PPFs with the applicable NRC Regional office and NSIR and NMSS, until such time that the State may resume its responsibilities as an Agreement State under Section 274b or resume its contract under Section 274i.	3.2
HQ and Regions	Participate in the Pandemic Test, Training, and Exercise Program.	F
HQ and Regions	Each Office and Region will develop and maintain pandemic-related processes and procedures to implement the PPFs in Table 1 including orders of succession within each Office and delegations of authority.	3.2
HQ and Regions	Establish plans for continual communications with the NRC staff, domestic, international, State, local, and Native American Tribal government officials, media, and public as identified in Table 1.	3.2

HQ and Regions	Develop plans for restoration of functions previously shed.	5.2
HQ and Regions	Include anticipated costs of preparing for a flu pandemic in Office budgets.	3.2
HR	Develop and implement a pandemic-related communication plan that addresses topics like known characteristics of avian flu, personal hygiene techniques, prevention, and etc.	3.2
HR Regions	HR and the Regional Offices will have a staff member responsible for identifying one or more local contractors who are willing and able to arrange for whatever employee assistance services may be needed during an emergency.	6.5
HR	HR will work with HHS and FEMA to develop and implement programs to support impacted employees and families in accordance with the Nation Response Plan.	6.5
HR	NRC personnel will be provided training on the basic characteristics of avian flu, characteristics of a pandemic, health effects, hygiene, social distancing factors, individual and social risk, procedures for contacting NRC	6.2
HR	Ensure that each potential COOP site has a staff member responsible for identifying one or more local contractors who are willing and able to arrange for whatever personal support services may be needed during an emergency.	H-5

NRR Office-related functions	• Develop specific model TSs amendments; streamlined model enforcement discretion; streamlined review, concurrence, issuance of emergency TSs/Exigent TSs; streamlined reduction of signature authority	Office-level procedures for PPFs from Table 1
	• Develop strategy for deferring, delaying, or cancelling baseline inspection program	
	• Oversight of licensees' preparedness and response to a pandemic. Develop process for confirming licensees are prepared to respond to a pandemic and maintain sufficient staffing levels in key positions to maintain safety and security (analogous to oversight of strike preparations).	
	• Develop process for devolution of authority and job tasks - plan, communication, and training (Staffing Plan) - Devolution of operation - Delegation of authority - Primary and Alternate staffing plans - Order of succession, by position, to head the Office and each division and branch - three or more successors - Procedures and plans to support accomplishment of pandemic-related communications identified in the Pandemic Response Plan - Procedures to empower cognizant managers and decisionmakers to maintain PPFs and job tasks and to provide for distributed management during flexiplace/telework	
	• Develop process for work shedding (from full work load to PPFs) - priority of order and how - Plan for shedding work from full load to PPFs - Time phased plan, restoring functions and projects in order of priority for resuming normal business operation - Plan for restructuring the staff	
	• Other preparedness activities - Conduct annual review and updates of NRR procedures for Office-related pandemic functions - Develop process for reporting staff availability - Prepare concepts and expected requirements for expanding flexible work schedules, alternate work locations, and telecommuting - Identification and retention of of necessary Records - Maintain and update necessary files, documents, computer software, and databases required to carry out the essential functions. - Plan for implementing Enterprise Support Functions	
NRR NSIR NMSS OGC OE	Enforcement procedures will be modified, as needed, enhance flexibility and efficiency in the review and approval of Enforcement Discretion, relief requests, amendments, exemptions, Orders, and consideration for mitigative or compensatory measures for power reactors, materials licensees, and fuel facilities.	A-4.2.5

NSIR	Staff shall prepare primary and alternate staffing plans required to meet NRC Federal obligations. Although this is nominally an NSIR function, staffing is an agency obligation and requires the support of Offices. (See the memorandum from the Executive Director for Operations to Office Directors and Regional Administrators concerning such staffing, available in ADAMS as ML050810158.)	3.2
NSIR	Coordinate protection of vital emergency operating records in accordance with NSIR lead responsibilities for these records.	9
NSIR	To prepare for concurrent safety or security incidents or work situations requiring communication coordination through Headquarters Operations Center, NSIR should prepare concepts and expected requirements for "distributed management" and "distributed operations" to be used during a pandemic and concurrent responses to emergencies defined in the COOP Plan. If pandemic effects prevent the agency from staffing a lead location, NRC could support a lead decisionmaker with appropriate technical teleconferences, as discussed further in the following section.	3.2 3.3
NSIR NRR	Establish a process for monitoring licensee preparedness such as staffing levels in key positions sufficient to maintain safety and security of licensed facilities and materials.	3.2
NSIR	Develop a HOO/ROO procedure for maintaining a current list of persons filling each position on the PET, and for ensuring that successors have been notified (usually by the person relinquishing the position).	3.6
NSIR OGC OCM	Review Presidential Emergency Action Documents (PEADS), select those most likely to be needed by NRC, and prepare potential requests to be modified and submitted only as the Commission directs. (Readiness is recommended because demands for White House actions will likely be heavy when NRC's own needs are highest.)	3.2
NSIR OIS	Contingency planning should provide for separate, redundant, and diverse means of accomplishing pandemic-related communications: • NSIR and OIS planning needs to consider possible contingencies from a temporary or short-term disruption to a total communications failure. • Contingency planning should consider capability losses during Hurricane Katrina (in Year 2005) • NSIR needs to set communications systems in priority order. This will determine which ones need to be restored first in an emergency. • NSIR needs to determine back-up or redundancy for each communication system or function. • NSIR needs to identify what secure communications systems will be needed to perform identified essential functions.	C-5

| NSIR | Select and prepare for the preferred option for maintaining HQ Operations Center staffing as long as possible. Options include:
• Maintain Headquarters Operations Center, Incident Response Center, and threat assessment facilities as "clean" areas.
• Predesignate shifts for response, support, and security that would simply report for 12 hours, then go home to rest and return the following day for their next shift as their health conditions dictate. There will likely be some infection, but with sufficient team depth and limited mortality rates, the risk should be kept outside the NRC as well. Response personnel would be expected to continue to report for duty as their health and needs dictate.
• If mortality rates are higher, sickness becomes riskier and shift teams would have to report up to two days early and be quarantined before entering the Operations Center. More team depth would be needed, but quarantining could reduce or eliminate the need for quick screening (which is currently not possible).
• Ultimately, teams may have to be sequestered for the duration of Operations Center staffing. Relief shifts, if needed, would need to be quarantined before entering the Operations Center.   Food and other supplies would need to be decontaminated before delivery to the clean workspace. Sequestering for days or weeks will require substantial provisions for dealing with family issues.
• The number of employees reporting to the worksite could be reduced by performing some functions by teleconference. Response to an incident would necessarily be degraded because some functions would be impractical to perform at home. Threat assessment is one example. However, those functions might be performed at other pre-approved locations.
• In coordination with other Federal departments and agencies, NRC will address the medical, operational, technical, and human issues in order to make informed decisions about the best way to maintain and function from a clean and secure workspace, about establishing screening centers as techniques become available, and about maintaining clean space for clearance of returning employees as the influenza emergency abates. | 6.1 |

NSIR OIS HR ADM Regions	Prepare for possible distributed management and operations by providing for the following: • The HOOs and ROOs must be physically in place at their respective stations, as noted above. Otherwise, NRC must devise a communications alternative. • HOO or ROO staffs must be protected from the pandemic. Sequestering may be required although expert opinions are divided on this approach. Some licensees consider sequestering a possibility and others do not. The staff must be protected while providing for rest, food, and family responsibilities. • The Occupant Emergency Plan will need to be reexamined and modified, as appropriate. • HOO or ROO staffs may need to be augmented to support a pandemic-related communications, team conferences, the PET, possibly increased event reports from licensees, and other calls concerning the status of their operations. Former HOOs should be re-qualified to augment the pool. • Telephone and computer technicians are needed for support for equipment operations and maintenance. Contracts for these activities may need to address changing needs during a pandemic. • Communications upgrades to Headquarters and the alternate site should be assessed to ensure the new capabilities will support the pandemic scenario. • Protection of resident inspectors and site teams if their roles change as the pandemic progresses.	3.3
NSIR PPF Offices	The NSIR Division of Preparedness and Response (NSIR/DPR) has responsibility for the maintenance of an effective and operational Pandemic Response Plan. NSIR will develop and maintain implementing procedures for the PET. NSIR will lead an annual review to ensure agency readiness.	2.5 8.2
NSIR	Prepare to implement the Incident Response Plan with full staffing capability at Headquarters Operations Center for as long as possible before the place becomes uninhabitable and necessitates a transition to an alternate location or system.	3.4
OCM	Provide means for the NRC Chairman, or designee (typically a member of the Commission), to direct that the Plan be implemented	3.1
OGC	Examine feasibility of streamlining the process for granting temporary exemptions from regulations under certain emergency situations, e.g., a pandemic, when licensees take adequate compensatory measures	Table1, Enforcement Functional Category
OIS	Provide wide area network services between Regional Offices and restore minimum (electronic mail) access to the Internet using, if necessary, alternative Internet addresses.	H-5
OIS	Ensure that persons designated by NSIR and the Regional Offices have necessary authorizations and procedures for invoking priority access, restoration, and other arrangements to increase the availability and reliability of Federal and commercial telephone communications.	H-5

OIS NSIR PPF Offices	Pandemic Communications Procedures and Equipment Plan: • Office of Information Services (OIS) has the lead for working with NRC Offices and Regions to provide the infrastructure needed to support normal and emergency communications capability during a pandemic situation. • The Operations Center will serve as the communications center for facilitating agency-level "virtual decisionmaking" from remote locations. • Offices and Regions will establish procedures for accomplishing PPFs and job tasks using available separate, redundant, and diverse communications media. Commercial conferencing systems may also be available. • OIS and the Regional Offices will coordinate to maintain the Emergency Telecommunications System (ETS) / Federal Telephone System (FTS) for communications with NRC licensees, including the capability to divert calls when functions are transferred or diverted. ETS/FTS, including satellite telephones, is a mission-essential system. • NSIR will coordinate with OIS and the Regional Offices to maintain procedures for using ETS, for identifying ETS problems, and for addressing problems with staff and contract resources. • ADM will maintain capabilities, procedures, and contacts for reliable emergency communications with General Services Administration (GSA), Federal Protective Service (FPS), and other law enforcement and public safety organizations.	C-6
OIS HR	Telecommunications and information systems support provided at NRC facilities must be robust and capable of supporting extensive use of flexiplace/work at home assignments for agency personnel to support PPFs.	6.4
OIS	Coordinate protection of vital legal and financial rights records	9
OIS & other HQ Offices; Regions	Provide necessary infrastructure to enable remote decisionmaking and telework for a majority of NRC Headquarters and Regional personnel. Establish establish procedures to implement this Plan and to test remote working capability of key managers and technical staff.	8.1
Potential PET members	The PET must test in advance provisions for distributed management and operations as proposed in Section 3.3, "Concept of Operations." The proposed concepts and any proposed alternative arrangements for maintaining management and operations should be examined for suitability and effectiveness, then periodically reexamined as new technology becomes available.	H-5
PPF Offices Regions	Offices should prepare plans and procedures for expanding flexible work schedules, alternate work locations, and telecommuting. These plans and procedures should include: • Remote decisionmaking by key managers and members of the technical staff, and • Effective controls for sensitive information management.	3.2

PPF Offices Regions	Office Directors and Regional Administrators should prepare assignments for adequately staffing each of the PPFs defined in Table 1. Office Directors should collaborate in order to: • Identify skill sets needed and the individuals who possess the skills to perform the PPFs as well as those who can be reassigned due to delayed or cancelled functions. • Identify and designate qualified staff required to provide sufficient depth for each PPF and, where necessary, request additional staff and training.	3.2
PPF Offices Support	The Offices with normal responsibilities for performing any of the PPFs and the Offices responsible for support will develop and maintain the following: • Procedures required to implement the Pandemic Response Plan • Persons qualified to perform the functions • Systems required to support those functions • Staff and contractors qualified to operate and maintain the support systems	2.5
PPF Offices Support	Offices with PPF and support responsibilities must identify the documents that they believe should be defined as vital legal and financial rights records, and the form in which they would be used in an emergency and how they will be protected, to OIS. Similarly, they must identify documents that they believe should be defined as vital emergency operating records to NSIR.	9
PPF Offices	Offices should identify and protect important (as differentiated from "vital") records as they deem appropriate.	G-4
Region IV	Be prepared to receive calls diverted from Headquarters.	H-5

B-5   PET and Support Responsibilities During Pandemic Response Operations

Office	Operating Tasks
ADM NSIR HR OIS	• Receive reports of possible disruptions; Occupant Emergency Coordinator relay to the Designated Official in the Occupant Emergency Plan and notify the HOO and others. • Implement ADM contingency plans as appropriate • Arrange for the availability of provisions deemed essential for general physical comfort, health, safety, security, and to limit the spread of the pandemic. • With the assistance of ADM, OIS will ensure that contractor and staff support is prepared and authorized to help set up new computer programs to support unanticipated pandemic needs.
Chairman or designee (typically a member of the Commission)	• Resolve conflicts in leadership if any arise from provisions of the various contingency plans. • Direct the Office of Public Affairs to make appropriate announcements through the media to NRC staff not at work in the headquarters buildings. • Terminate pandemic activities when criteria are met.
Deputy EDOs	• Succeed to head of agency, if necessary. • Make or assist with decisionmaking, if needed, and serve on the PET.
EDO	• Succeed to head of agency, if necessary. • Make or assist with decisions, and serve on the PET. • Grant excused absences, liberal leave, excused absence, or directives to work at home to personnel as needed to support PPFs.
HQ and Regions	• Provide staffing to support NRC PPFs before committing staff to non-pandemic priority assignments. • Be prepared to assist other Offices as needed. • Keep PET informed of status of staff and any emergent issues
NSIR NMSS NRR	• With the support of ADM, OIS, and other Offices as appropriate, establish and maintain secure communications capabilities and contacts with other departments and agencies as required for assured COOP and COG during the pandemic emergency. • Ensure that appropriate procedures for secure communications are integrated into the Pandemic response.
OCFO	• Ensure that financial resources are managed as necessary. • Maintain continuity of the payroll functions. • Provide travel support. • Process commercial payments.
OGC	• Be prepared to advise the PET regarding emergency personal assistance services. • Be prepared to advise the PET regarding relief for licensees

OIS	• Provide wide area network services between Regional Offices and restore minimum (electronic mail) access to the Internet. If the agency's primary Internet access (through NIH) is lost, this may require use of an alternative Internet address. • With NSIR, NMSS, and ADM maintain secure communications capabilities with other departments and agencies as required for assured COOP and COG.
PET	Develop a plan to transition from pandemic status to normal operations
Regions I, II, III	• Regional management shall attempt to account for the whereabouts of Regional personnel after evacuation and report information to the Occupant Emergency Coordinator. • Provide staffing to support NRC PPFs before committing staff to non-pandemic priority assignments. • Be prepared to assist other Regions and PET as needed. • Keep PET informed of status of staff and any emergent issues
Region IV	Note: Since Region IV has communications equipment to handle certain emergency response that other regions do not, their area of responsibility during a pandemic is wider in scope than those for other regions. • Regional Administrator act as Designated Official under Regional Occupant Emergency Plan and participate on the PET. • Regional Duty Officer (RDO) provide readiness status of the Regional Office to the PET • With ADM and NSIR maintain provisions for receiving and exchanging information about situations that may disrupt normal NRC operations. • Regional Administrator decides whether to evacuate the Regional Office and to direct the transfer of its incident response functions to Headquarters. • Regional management shall attempt to account for the whereabouts of Regional personnel after evacuation and report information to the Occupant Emergency Coordinator. • Maintain a chronological log of necessary information, actions, and decisions. • Be prepared to receive calls diverted from Headquarters. • Be prepared to record emergency-related calls to and from the Regional Office and to use commercial telephone conferencing services to supplement NRC capabilities when necessary. • Designate those who would be granted excused absences to provide more workspace, if necessary, for pandemic emergency staff. • Consider backup arrangements for feeding duty personnel and resting others at nearby government or commercial facilities during an emergency. • Restore IT services as quickly as conditions permit and, under near-worst-case conditions. • With contractor personnel, be prepared to locate, install, and test IT services as quickly as conditions permit.

ANNEX C: PANDEMIC COMMUNICATIONS

C-1   Purpose

Communications are essential to maintaining and continuing normal and emergency operations capability during a pandemic influenza. Communications are needed to communicate with the staff, the President and Congress, other Federal departments and agencies, State and local governments, licensees, the media and members of the public on the status of NRC activities and the safety and security of licensed activities during a pandemic influenza. Communications are vital to disaster relief and recovery efforts at all levels of operations.

The purpose of this Annex is to ensure that the U.S. Nuclear Regulatory Commission (NRC) has a comprehensive communication plan in place, specifically designed to address the Pandemic Priority Functions (PPFs) identified in Table 1 of the Pandemic Response Plan.

C-2   Applicability and Scope

A primary objective of Pandemic Communications is to ensure that the NRC can maintain and sustain communications during a pandemic influenza.   NRC Offices and Regions will have procedures and plans to support accomplishment of pandemic-related communications identified in the main sections of the Pandemic Response Plan. This includes both the PPFs and the associated enterprise support functions. Of particular importance are the elements identified in Annex E, "Pandemic Facilities, Equipment, and Capabilities," and Annex L, "Human Capital."

C-3   Objectives

The primary objective of the procedure is to provide the strategy and framework for communications during a pandemic influenza, which would involve degraded staffing conditions and may require innovative means of confirming safety and security of license activities and materials.

C-4   Capability Requirements

Many of the PPFs and job tasks will need to be coordinated so that a large portion of the NRC staff can work remotely using flexiplace/telework arrangements. This may necessitate the increased acquisition of portable computer equipment in Office refresh initiatives. NRC would strive to maintain Headquarters staffing for incident response and threat assessment and dissemination of PPFs.

Key capabilities include the following:

- Ability to initiate and sustain leadership and decisionmaking functions and activities.

- Ability to communicate with the Commission, staff, management, and other organizational components with minimal delay.

- Ability to notify licensees in a uniform manner (e.g., pre-staged advisories) of NRC entry/exit into the Pandemic Response Plan and methods for them to communicate with the agency under those conditions.

- Ability to communicate with the President; Congress; other Federal departments and agencies; State, local, and Native American Tribal government; and licensees under normal and emergency conditions with minimal delay.

- Access to other database and analysis systems necessary to conduct priority functions and activities.

- NRC Offices shall maintain and update necessary files, documents, computer software, and databases required to carry out the agency's essential functions remotely.

- Capability should be directed toward the use of flexible technology for future procurement and refresh initiatives (e.g., portable computers).

C-5   Contingency Planning

Contingency planning should provide for separate, redundant, and diverse means of accomplishing pandemic-related communications. NSIR plays a key role in serving as the central communications link under degraded conditions that might exist under pandemic conditions. OIS plays a key role in planning for and in developing the infrastructure to enable a much larger population of flexiplace/telecommuting workers (e.g., an initial capability of 600-1,000 staff to work at home).

- NSIR and OIS planning needs to consider possible contingencies from a temporary or short-term disruption to a total communications failure.

- Contingency planning should consider capability losses as experienced during Hurricane Katrina (in Year 2005).

- NSIR/DPR needs to set communications systems in priority order. This will determine which ones need to be restored first in an emergency.

- NSIR/DPR needs to determine back-up or redundancy for each communication system or function.

- NSIR/DPR needs to identify what secure communications systems will be needed to perform identified essential functions.

C-6   Pandemic Communications Procedures and Equipment Plan

Procedures and equipment will be based on PPFs and support requirements provided in Table 1 of the Pandemic Response Plan. Communications can be further divided into categories including:

- Alternative electronic communication (e.g., Internet, e-mail, pagers)

- Paper-based communication (facsimile)

- Verbal communication (telephone or radio)

Interoperable Communications Systems	
System Type	System/Service Name
Voice	• Federal Telephone System (FTS) • Public Telephone Switch Network (PSTN) • Cellular Telephones – Secure and Non-secure • National Warning System (NAWAS) • Secure and Non Secure Facsimile • Iridium Satellite Telephones • Wireless Priority Service • Government Emergency Telecommunication Services (GETS)
Radio	• High Frequency/Auto Link Establishment (HF/ALE)
Data	• Internet Access • Local Area Network (LAN) • Classified Communication System • SIPRNET (will be replaced by HSDN) • Homeland Security Data Network (HSDN) • COOP Network

This Annex describes relevant communication during an event in which the NRC has initiated the implementation of the Pandemic Response Plan. NSIR and OIS will ensure there are provisions of available and redundant critical communication systems to support connectivity to both internal and external organizations, other agencies, critical stakeholders, and the public.

C-7   Roles and Responsibilities

• Office of Information Services (OIS) has the lead for working with NRC Offices and Regions to provide the infrastructure needed to support normal and emergency communications capability during a pandemic situation.

• The Operations Center will serve as the central communications center for facilitating agency-level "virtual decisionmaking" from remote locations.

• Offices and Regions will establish procedures for accomplishing PPFs and job tasks using the available separate, redundant, and diverse communications media.

• OIS and the Regional Offices will coordinate to maintain the Emergency Telecommunications System (ETS) / Federal Telephone System (FTS) for communications with NRC licensees, including the capability to divert calls when functions are transferred or diverted. ETS/FTS, including satellite telephones, is considered a mission-essential system.

• NSIR will coordinate with OIS and the Regional Offices to maintain procedures for using ETS, for identifying ETS problems, and for addressing problems with staff and contract resources.

• Office of Administration (ADM) will maintain capabilities, procedures, and contacts for reliable emergency communications with General Services Administration (GSA), Federal Protective Service (FPS), and other law enforcement and public safety organizations.

C-8	General Communication Guidance

This Plan takes advantage of improving communications technology, redundant systems, and extensive capabilities in NRC Headquarters and Regional Offices to continue functions remotely without having to move large numbers of people. When the decision is made to implement the Pandemic Response Plan, Offices and Regions will implement their pre-planned procedures for shedding work and working remotely.

- To the extent practicable, personnel will establish flexiplace/telecommuting arrangements to accomplish PPFs and job tasks in Table 1 of the Pandemic Response Plan.

- Commercial telephone conferencing services will be employed as necessary and available to supplement NRC teleconferencing capabilities to ensure that the agency responds effectively to severe or concurrent incidents.

- NRC will establish an automated telephone systems in Headquarters and the Regions that can route and forward incoming messages without assistance of an NRC telephone operator.

- Offices and supervisors will implement enterprise support functions to account for the status and well-being of personnel and to ensure that work is accounted for and that the staff is paid for the services and work performed.

The following are key activities that need to take place when activating the Pandemic Response Plan:

- Notify NRC personnel when implementation of the Plan has been initiated.

- Redirect computer messaging and telephones to provide contact information on how to contact you or other cognizant personnel for job tasks in applicable areas of responsibility.

C-8.1	Dissemination of Threat Assessment Information

Assessment and dissemination of threat information to NRC-regulated facilities are vital to the protection and defense of NRC-regulated facilities, especially commercial nuclear reactors, Category I fuel cycle facilities, one uranium conversion and two enrichment plants, spent fuel and high-risk radioactive source transportation activities. In addition, the NRC ensures that its regulated facilities are implementing appropriate protective measures in accordance with the pre-established Homeland Security Advisory System (HSAS), including responding to imminent threat information. Examples of NSIR procedures and notifications may include the following:

- Security Advisory Notifications
- Terrorist and Third Party Threat Notifications
- Imminent Aircraft Threats
- NRC Advisory Distribution
- Physical Attack on NRC Licensed Facility
- Change in HSAS Threat Condition
- Intelligence Assessment Team Advisory Notifications

C-8.2   Communication with External Entities

Communications with the Department of Homeland Security, other departments/agencies, State and local officials, and other appropriate stakeholders are critical to minimizing immediate threats to public health and safety and common defense and security. NRC must assess and communicate information rapidly to regulated critical facilities and ensure that these facilities are implementing the proper protective measures and facilitate communications between the licensee, Department of Homeland Security, law enforcement, the Department of Defense (NORTHCOM/NORAD) and other responders. The HOOs act as the facilitator in most of these communications by establishing connections for NRC personnel responsible for communicating with the external entities. The HOOs have in their database the various contact numbers for the external entities. They have the ability to contact multiple facilities through a parallel call-out, referred to as a "Blast Dial," placing them on a common conference bridge, which enables information to be shared with a group without individual calls to each one.

C-8.3   Notification and Communication with NRC Leadership

Notification and communication with NRC leadership are normally handled through the HOOs and ROOs. They maintain a database of contact information that includes multiple means of reaching managers at all times. They also maintain a database of the availability of senior managers that is updated at a minimum on a weekly basis.

C-8.3.1 Notification and Communication with NRC Response Personnel

Notifications and communications with NRC response personnel are normally handled by the HOOs through the Automatic Notification System (ANS). In backup to the ANS, individuals can be contacted through normal means; contact information is maintained in the HOO database for all NRC personnel. The database also provides information on response team membership, thus replacing a missing response team member will be handled expeditiously.

C-8.3.2 Notification and Communication with NRC Non Essential Staff

Notification of NRC staff located in the office is done via building announcement system. For office closings, OPM maintains a Web site (http://opm.gov/status/) which provides "Federal Government Operating Status in the Washington, DC Area." The same information can be obtained by calling the Operating Status number, (202) 606-1900 or via the NRC Operation Status Hotline at 1-888-415-4NRC (1-888-415-4672). In addition, operating status is passed to the television and radio stations for public announcements.

C-8.3.3   Information Security

NRC will maintain records in accordance with the NRC Information Security Program. Personnel will protect and sure electronic and hard copy documents, references, records, and information systems to support PPFs are described in Annex G, "Necessary Records and Database." NRC personnel will maintain the integrity and control of records, whether working in their Office or at remote work locations, in accordance with the Information Security Program.

ANNEX D: ORDERS OF SUCCESSION, DELEGATION OF AUTHORITY, AND
            DEVOLUTION PLANS

D-1   Purpose

This Annex establishes the order of succession of U.S. Nuclear Regulatory Commission (NRC) officials who will serve during implementation of the Pandemic Response Plan.

D-2   Applicability and Scope

The provisions contained within this Annex are applicable to all organizational elements at Headquarters and Regions.

D-3   Objectives

Order of Succession:

Primary objective of this Annex is to identify an order of succession to ensure effective leadership during a pandemic influenza situation. An order of succession ensures continuity by identifying, by position, the individuals authorized to act for agency officials in case those officials are unavailable.

Delegations of Authority:

Delegations of Authority specifies who is authorized to act on behalf of agency officials when the Pandemic Response Plan is in effect.

Offices and Regions will establish procedures to delegate authority to cognizant managers and decisionmakers to maintain continuity of operations for Pandemic Priority Functions (PPFs) and job tasks and to provide for "virtual management" of roles and responsibilities during distributed management and flexiplace/telework staffing conditions.

Devolution:

This Annex will also ensure the NRC has the full capability, authority, and responsibility established for transferring its PPFs for severely degraded conditions. If conditions exist such that NRC finds it necessary to transfer Priority Mission-Essential Functions (i.e., incident response and threat assessment) from Headquarters authority to an NRC Regional Office, NRC operations will be guided by the COOP Plan.

D-4   Orders of Succession

The order of succession to head the NRC provides the overall geographic dispersion of management that is encouraged by PDD 67. In the event of the Chairman's death, resignation, or unavailability to perform the functions and duties of the position, the order of succession to head the agency during an emergency is identified in the COOP Plan.

Under Reorganization Plan No. 1 of 1980, the Chairman may exercise all the functions vested in the Commission pertaining to an emergency. The Chairman may delegate the authority to perform such functions, in whole or in part, to any other members of the Commission. This authority may also be delegated or redelegated to the NRC staff. A situation so disruptive that the Chairman, Commissioners, NRC Executive Director for Operations (EDO), and Deputy Executive Directors are all unavailable is likely to be a COG situation that threatens the entire

executive branch, at least. In such a situation, the President may direct senior NRC officials remaining in the Washington area to a Federal relocation site to help restore executive branch and government-wide functions. Because its management ranks may be spread thin at such times, the agency also maintains COG-related access and training for a few additional managers for flexibility in supplementing and dispersing management functions. The PET will then prioritize and lead all activities (including activities leading to restoration of normal agency business) except the agency priority mission essential functions.

D-4.1 Authority of NRC Chairman

The Chairman normally determines whether to delegate some or all of his authority to an Acting Chairman. The Chairman exercises all functions of the Commission pertaining to an emergency under Section 3 of the Reorganization Plan No. 1 of 1980 and may delegate some or all of such authority to another Commissioner or a member of the NRC staff. In the event of activation of the COOP Plan, the order of succession for the NRC Chairman is as established in the COOP Plan. The order of succession for the Chairman, per the COOP Plan, is as follows:

- Pre-designated Acting Chairman
- Other Commissioners in order of seniority
- Executive Director for Operations
- Deputy Executive Director for Reactor and Preparedness Programs (DEDR)
- Deputy Executive Director for Materials, Research, State and Compliance Programs (DEDMRS)
- Deputy Executive Director for Information Services and Administration and Chief Information Officer (DEDIA)
- Regional Administrator, alternate COOP site
- Deputy Regional Administrator, alternate COOP site

D-4.2 Succession to Other NRC Positions

Each Office Director has designated at least three successors to his/her position by the members of his/her staff. These persons shall have the authority to exercise the powers and duties of the Office in the event of the unavailability of those above them on the list of designees. Successors shall exercise authorities and functions only until superseded by an official higher on the list or by the successor specifically designated by proper authority to assume direction.

D-4.2.1 Order of Succession, Executive Director for Operations (EDO)

- Deputy Executive Director for Reactor and Preparedness Programs (DEDR)
- Deputy Executive Director for Materials, Research, State and Compliance Programs (DEDMRS)
- Deputy Executive Director for Information Services and Administration and Chief Information Officer (DEDIA)

D-4.2.2 Order of Succession, Deputy Executive Director for Reactor and Preparedness Programs (DEDR)

- Director, Office of Nuclear Security and Incident Response (NSIR)
- Director, Office of Nuclear Reactor Regulation (NRR)
- Deputy Director, Office of NSIR
- Deputy Director, Office of NRR

D-4.2.3   Order of Succession, Deputy Executive Director for Materials, Research, State and Compliance Programs (DEDMRS)

- Director, Office of Nuclear Material Safety and Safeguards (NMSS)
- Director, Office of Nuclear Regulatory Research (RES)

D-4.2.4   Order of Succession, Deputy Executive Director for Information Services and Administration and Chief Information Officer (DEDIA)

- Director, Office of Administration (ADM)
- Director, Office of Information Services (OIS)

D-4.2.5   Order of Succession, Office of Nuclear Material Safety and Safeguards

- Deputy Director, Office of NMSS
- Director, IMNS
- Director, FCSS
- Director, SFPO
- Director, DWMEP

D-4.2.6   Order of Succession, Office of Nuclear Reactor Regulation

- Deputy Director, Office of Nuclear Reactor Regulation
- Associate Director for Operating Reactor Oversight and Licensing (ADRO)
- Associate Director for Engineering and Safety Systems (ADES)
- Associate Director for Risk Assessment and New Projects (ADRA)

D-4.2.7   Order of Succession, Office of Nuclear Security and Incident Response

- Deputy Director, NSIR
- Director, Division of Preparedness and Response (DPR)
- Director, Division of Security Operations (DSO)
- Director, Division of Security Policy (DSP)

D-4.2.8   Order of Succession, Office of Nuclear Regulatory Research

- Deputy Director, Office of Nuclear Regulatory Research
- Director, Division of Fuels, Engineering, & Radiological Research (DFERR)
- Director, Division of Risk Assessment and Special Projects (DRASP)

D-4.2.9   Order of Succession, Regions
- Deputy Regional Administrator
- Director, Division of Reactor Projects
- Director, Division of Reactor Safety
- Director, Division of Nuclear Materials Safety (for Region II, Director, Division of Fuel Facility Inspection)

D-4.2.10   Order of Succession, Office of Administration
- Deputy Director, Office of Administration
- Director, Division of Facilities and Security

- Director, Division of Contracts
- Director, Division of Administration Services

D-4.2.11   Order of Succession, Office of Information Services
- Deputy Director, Office of Information Services
- Director, Office of Information Services / Information and Records Services Division (IRSD)
- Director, Office of Information Services / Infrastructure and Computer Operations Division (ICOD)
- Director, Office of Information Services / Business Process Improvement and Applications Division (BPIAD)

D-4.2.12   Order of Succession, Office of Human Resources

- Deputy Director, Office of Human Resources
- Associate Director, Human Resources Development and Training
- Chief, Human Resources Services and Operations
- Chief, Organization and Labor Relations

D-4.2.13   Order of Succession, Office of Public Affairs

- Deputy Director, Office of Public Affairs
- Special Assistant to the Director
- Public Affairs Officer

D-4.2.14   Order of Succession, Office of State and Tribal Programs

- Deputy Director, Office of State and Tribal Programs
- Senior Federal and State Liaison Program Manager
- Senior Health Physicist

D-4.2.15   Order of Succession, Office of the Chief Financial Officer

- Deputy Chief Financial Officer
- Director, Division of Financial Services
- Director, Division of Planning, Budget, and Analysis

D-4.2.16   Order of Succession, Office of the General Counsel
- Deputy General Counsel
- Associate General Counsel for Hearings, Enforcement & Administration
- Associate General Counsel for Licensing & Regulation

D-4.3   Order of Succession for Alternate COOP Site, Region IV

When Headquarters is unable to respond, the Alternate COOP site will lead the agency to continue its priority mission essential functions with the following order of succession:

- Regional Administrator
- Deputy Regional Administrator
- Director, Division of Reactor Projects
- Director, Division of Reactor Safety
- Director, Division of Nuclear Materials Safety

D-5   Delegations of Authority

This NRC procedure is directed toward maintaining the continuation of essential PPFs while striving to ensure the maximum protection, health, well-being, and security of its employees and their families. Offices and Regions will establish procedures to delegate authority to cognizant managers and decisionmakers to maintain continuity of operations for PPFs and job tasks and to provide for "virtual management" of roles and responsibilities during distributed management and flexiplace/telework staffing conditions.

D-6   Devolution and Reconstitution

For a pandemic influenza, it is expected that a degraded, cyclical condition will exist and that most PPFs and job tasks can be accomplished via flexiplace/telework. In parallel, NRC may continue to maintain a limited staffing contingency for certain pandemic priority categories (e.g., incident response and threat assessment).

Devolution, as applied in this Plan, is the capability to transfer authority and responsibility for the agency's PPFs from an organization's primary operating staff and facilities, and to sustain operational capability under devolved authority for an extended period. Because local outbreaks will occur at different times, have variable durations, and may vary in their severity, devolution will consider rotating operations between Regional Offices as the pandemic waves move across the United States. The NRC devolution strategy ensures the continuation of the agency's mission essential functions in the event that the agency's leadership and staff are unavailable or incapable to continue supporting the essential functions from Headquarters or one or more Regional Offices.

ANNEX E: PANDEMIC FACILITIES, EQUIPMENT, AND CAPABILITIES

E-1   Purpose

This Annex identifies the Pandemic Response Plan facilities, equipment, and capabilities necessary to continue U.S. Nuclear Regulatory Commission (NRC) Pandemic Priority Functions (PPFs), for potentially recurring waves of illness during an emergency situation.

E-2   Applicability and Scope

The provisions within this Annex are applicable to facilities, equipment and capabilities during pandemic influenza planning, response and recovery. This section is directed primarily toward maintaining enterprise support functions portion of the PPFs. These include the following:

- Building operations
- Custodial services
- Contract awards and administration (including invoice payments)
- Guard services
- Computer systems
- Telecommunications systems
- Food services
- Inventory management
- Human resources services
- Employee Assistance Program
- Employee/occupant accountability
- Parking
- Payroll services
- Travel services
- Commercial payment services
- *Federal Register* Notices
- Mail services
- Necessary supplies
- Local emergency transportation

Because a pandemic represents a long-term contamination issue, the primary hazard is to the human occupants of operating buildings and facilities. The primary challenge in returning to normal operations is the hygiene of the infrastructure. The actual buildings are not at risk to pandemic related contamination but represent a hygiene impediment to the return to normalcy. Office procedures will address the necessary job tasks that will be needed to maintain ongoing operations in a degraded pandemic condition and the required decontamination for "clean areas" and areas requiring recovery to allow reentry. This procedure also provides for the access control of non-NRC personnel during pandemic status.

E-3   Objectives

The primary objective of this Annex is to ensure that NRC facilities, equipment, and capability is maintained for normal and emergency operations during a pandemic influenza.

E-4   Facility Site Function

Fundamental to the impact on normal operations is the availability of facilities and equipment necessary for the staff to perform its PPFs. The hygiene of personnel has a large impact on the availability/unavailability of facilities and equipment. If a pandemic were to occur, NRC

would seek to maintain staffing of certain facilities, equipment, and capabilities that would be considered essential, even under severely degraded conditions. Those include the following:

- Headquarters Operations Center,
- Regional Incident Response Centers, and
- Threat assessment

Office planning and procedures will address the need for maintaining these critical facilities and capabilities as "clean" areas. As such, these areas would be expected to have strict access control and isolation methods from other building process systems such as heating ventilation and air conditioning.

Other NRC facilities and equipment will likely require decontamination measures in order to maintain access or to provide for reconstitution during recovery from the pandemic. Facility hygiene is a potential initiating event and common-cause-failure that could lead to the unavailability of diverse facilities, equipment, and capabilities.

Office Directors and Regional Administrators, in accordance with government-wide guidance and in coordination with NRC facilities management and the employee wellness program, will determine the need to restrict access to NRC facilities by non-NRC personnel during pandemic conditions.

E-4.1   Discussion

Below are the Pandemic Priority Functional categories that the Pandemic Response Plan is expected to support.

- Incident response
- Threat assessment and dissemination
- Pandemic-related communications
- Licensing
- Enforcement
- Inspection
- Enterprise support functions

Within these categories are PPFs and job tasks. The Enterprise Support Functions are cross-cutting to other categories and are necessary to support the success of the Pandemic Response Plan.

Many of the PPFs and job tasks can be coordinated so that a large portion of the NRC staff can work remotely using flexiplace/telework arrangements. NRC would strive to maintain Headquarters staffing for PPFs relevant to incident response and threat assessment and dissemination.

E-4.2   Action

Upon NRC declaration of an influenza pandemic condition, each Office will implement its procedures to accomplish the PPFs.

E-4.3   Incident Response and Threat Assessment Site Facilities

NSIR will maintain minimum facilities, equipment, and capabilities to support operations and remote decisionmaking during an influenza pandemic. The Headquarters Operations Center

and threat assessment work areas will serve as the central locations for managing agency-level communications and decisionmaking during pandemic conditions. Likewise, Regional Incident Response Centers will serve as the central locations for Regional communications and operations under pandemic conditions.

E-4.4   Minimum Facility, Equipment, and Capability Checklist

The NRC facilities require a minimum level of infrastructure, equipment, and capability. Offices and Regions should consider these items in tailoring their procedures to provide the necessary facilities, equipment, and capabilities to perform NRC PPFs. The facilities, equipment, and capabilities identified are considered to be the minimum necessary to maintain operations.

Minimum Facility Requirements:

• Commercial electrical power to equipment identified.
• Essential support systems (HVAC, potable water, sanitary systems/facilities)
• To the maximum extent practicable, facility is minimized of germs that could harm or threaten the occupants.

Minimum Telecommunications Requirements:

• Ability to receive calls made to (301) 816-5100
• Ability to receive facsimiles made to (301) 816-5151
• Ability to communicate with other federal departments and agencies via secure media
• Ability to establish at least 20 separate conference bridges
• Ability to work remotely and to communicate with the HOC or IRC, their supervisors, and licensees to coordinate work.
• Ability to report on or verify the accountability and health status of the staff

Minimum Computer Requirements:

• Access and interface with HOC and IRC Databases
• Pre-loaded software on computers
• Ability to access secure computer communication
• Ability to send and receive non-secure electronic communications (e-mail)
• Ability to support adequate remote access via broadband and/or modem to NRC networks to allow access to work-related files and databases
• Ability to make notifications and communicate in concert with the availability or unavailability of telecommunications systems

Facility Security and Access Requirements:

• Building security is being maintained and is assured.
• Emergency responder access to/from facility is not hindered by natural or man-made causes.
• Local infrastructure is adequate to support arrival of long-term assistance, if required

Facility Hygiene Requirements:

Preventative cleaning of common area surfaces (e.g., elevator controls, doors handles, stair rails, kitchens) will need to be conducted on a frequent schedule (e.g., daily). Certain security access control measures used to confirm identity (e.g., touching badges) may need to be modified as part of the overall hygiene program. The HOC, IRC, and threat assessment

facilities are maintained as "clean" areas to preclude occupants from being contaminated by persons accessing other parts of NRC-owned and leased facilities. As appropriate, facilities will provide:

- Access authorization and control
- "Clean area" hygiene controls
- HVAC separation from other building areas
- Licensee, State, and Federal telephone directories (emergency contact numbers)

E-4.5   Minimum Facility, Equipment, and Capability Checklist Tables

Table 1: Site Minimum Facilities

Minimum Facilities			
Facility Component	Function	Reasons(s)	Backup (if any)
1 Facility is free of hazards that could harm or threaten the occupants	Personnel Safety	Provide safe work environment	
2 Commercial (normal) electrical power supply to facility	Normal facility power supply	Provides electrical power to lighting, computers, and communications systems, etc.	To the maximum extent feasible permanently installed diesel generator with adequate, safe, and secure, fuel supply
3 Essential support systems (HVAC, fire protection, potable water, and sanitary systems/facilities)	Maintain habitable working environment at both NRC-owned and leased facilities	Provide long-term work environment and adequate cooling for electronic equipment	HVAC may need to be modified should provide biologically safe air handling. Portable toilets, and bottled water could satisfy short-term occupancy needs

Table 2:   Minimum Telecommunications Requirements – Secure Telephone and Facsimile

Communication Equipment	Function	Reason(s)	Backup
Verizon Redirect of HQ and Regions main telephone and facsimile numbers, as needed	Redirect calls and facsimiles to alternate locations	Calls made to HQ and Regions need automated answering system that can redirect calls for live response, as needed (e.g., incident response and threat assessment), or follow-up by workers at remote locations	Verizon direct contact numbers
Secure telephone and facsimile	Ability to communicate via secure media	Send/receive secure information	Back-up telephone and facsimile
Non-secure telephone and facsimile	Ability to communicate via non-secure media	Send/receive secure information	Wired or wireless devices
Conference Bridges (Minimum of 5)	Allows multiple parties to communicate at one time	Information sharing/decision-making	None
Telephone/Bridge recording system	Ability to record Site telephone and bridge lines	Accurately reconstruct conversations and develop timeliness	Cassette tape recorders

Table 3:   Minimum Computer Requirements

Computer Device	Function	Reason	Backup
Headquarters and Regional servers	Access and interface with Headquarters and Regional records and databases	Process remote decisionmaking and maintain necessary records	None
Office computer with specific pre-loaded software	Access to associated databases	Maintain operational continuity and status reporting	Server computer
Secure Computer	Ability to receive an transmit secure computer communication	Ability to access secure computer communication	None

HOO e-mail server	Ability to send and receive non-secure electronic communications (e-mail)	Maintain contact with licensees, States, and other Federal D/As	E-mail servers

Table 4: Facility Security and Access Requirements

Facility	Function	Reason
Security Force or other security provisions in-place	Building security is being maintained and is assured	Prevent unauthorized entry into building and work spaces
Facility and surrounding area is accessible	Emergency and threat assessment responders access to/from facility is not hindered by natural or man-made causes	Allows HOOs and threat assessment personnel to duty stations
Area transit infrastructure intact	Local infrastructure is adequate to support arrival of long-term assistance, if required	Allow relief workers from HQ and other Regions to report

E-5 Others

The section lists other equipment and capabilities that will be utilized during a pandemic influenza.

Government Emergency Telecommunication Services:

Government Emergency Telecommunication System (GETS) will be utilized by the PET and Regional staff to ensure communications capabilities exist during times of a severe national emergency when the public switch telephone network may be clogged. GETS supports Federal personnel during crises or emergencies by providing emergency access and priority processing for local and long distance calls on the public switched telephone network. GETS is intended to be used in an emergency or crisis situation when the public switched telephone network is congested and the probability of completing a call over normal or other alternate telecommunication means is reduced.

Wireless Priority Service:

Wireless Priority Service is referred to as the Nationwide Wireless Priority Service (WPS). WPS users have the ability to queue at the top for the next available capacity from their closest base station in order to place their call, greatly enhancing their ability to complete wireless calls during these critical times and assist the situation. WPS is available only to designated leadership at all government levels and, therefore, should be carried by each PET member and senior leadership at the COOP site.

ANNEX F: TESTING, TRAINING, AND EXERCISE PROGRAM

F-1   Purpose

The U.S. Nuclear Regulatory Commission (NRC) Pandemic Response Plan, Training, and Exercise Plan is essential to facilitate the continuation of NRC Pandemic Priority Functions (PPFs) and Support Requirements. Table 1 of the Pandemic Response Plan provides the NRC PPFs and Support Requirements. This Annex provides the testing, training, and exercise (TT&E) requirements for implementing for the planning, prevention, and mitigation of a pandemic situation.

Training provides the foundational understanding to the staff on means by which NRC employees can play a part in protecting themselves in maintaining and continuing the PPFs. Exercises serve to reinforce training but also demonstrates capability to execute policies, procedures, and management expectations. Exercises validate procedures and identify areas warranting corrective actions and lessons learned.

F-2   Applicability and Scope

NRC will conduct initial training of NRC employees within six months of approval of the Pandemic Response Plan. Employees will receive instruction on pandemic-related hygiene actions they can take to reduce the threat and spread of pandemic virus. NSIR will coordinate exercises to refine pandemic response procedures, execution of delegations of authority, and "virtual management" decisionmaking under degraded staffing conditions.

F-3   Objectives

The following goals or objectives have been established for the TT&E program:

•   Validate plan, policies, and its implementing procedures (Annexes).

•   Ensures that agency personnel are familiar with pandemic prevention including personal hygiene methods.

•   Ensure agency personnel are sufficiently trained to carry out PPFs, remotely and/or during normal duty status.

•   Test alert, notification and activation processes and systems at least annually.

•   Conduct individual and team training of agency pandemic response personnel to ensure currency of knowledge and integration of skills necessary to implement response plans and carry out the agency's PPFs.

•   Exercise procedures and pandemic decisionmaking responders to ensure the ability to perform the agency's essential functions during normal operations and during emergencies.

•   Ensure that backup and restoration procedures, backup data, and records to support PPFs are sufficient, complete, and current.

•   Test plans on an annual basis for recovery of vital classified and un-classified records, critical information systems and data.

•   Test primary and back-up infrastructure systems and recovery services.

- Test and validate enterprise support functions with particular emphasis on computer and telecommunications capabilities.

- Ensure agency personnel understand the procedure to phase down pandemic operations and transition to normal activities when appropriate.

- Conduct refresher orientation for pandemic responders.

- Document completed pandemic training and identify training requirements.

F-4   Training Program Requirements

Pandemic training will provide instructions for personnel to protect themselves and to make NRC and its facilities a safe working environment concerning the pandemic-related hazards. This training will provide the tools needed to accomplish the goal, meet program requirements, and/or acquire a capability specific to the PPFs. Basic methods for accomplishing the prescribed pandemic training will be facilitated through one, or a combination, of the following methods:

- Workshops
- Presentations or Briefings
- Read & Sign self training
- Web-based courses
- Table-Top Exercises

In addition, staff are required to re-familiarize themselves with the position specific procedures, for their role in accomplishing PPFs remotely. The timing requirements for this are dependent on infrastructure upgrades not yet established.

F-4.1   Pandemic Hygiene Training

NRC employees will receive instruction on pandemic-related hygiene actions they can take to reduce the threat and spread of a pandemic virus. Personnel having incident response and threat assessment responsibilities will attend task-specific training for entry into and conduct of operations in a "clean area" facility. Facilities and maintenance personnel will attend training on decontamination and recovery procedures for reconstitution of NRC facilities.

HR, with ADM, will propose and develop training programs to promote good hygiene practices. The frequency of pandemic hygiene training will be established as more knowledge of the hazard and its potential become evident and as Office of Personnel Management and Health and Human Services establish Government-wide guidance.

F-4.2   Virtual Management Training

On an annual basis, NRC will train and exercise a cross section of its staff on the procedures and methods for virtual management, otherwise known as remote decisionmaking. Personnel expected to carry out PPFs should participate in an exercise that tests virtual management on a three-year periodicity.

F-4.3   Position-Specific Training

Position-specific training should be conducted to ensure that individuals assigned to a particular response position have the necessary knowledge and skills to perform the tasks associated

with that response position and/or decisionmaking capacity. This may involve classroom-style training, on-the-job training, individual study, computer courses, and observations of more senior responders serving in that position. There should also be emphasis on training backups to get needed "bench-strength" for critical positions.

F-5   Pandemic Exercise Program

F-5.1   Tabletop Exercises

A tabletop exercise is a facilitated analysis of an emergency situation in an informal, stress-free environment. It is designed to elicit constructive discussion as participants examine and resolve problems based on existing operational plans and identify where those plans need to be refined. The success of the exercise is largely determined by group participation in the identification of problem areas.

For purposes of pandemic planning, tabletop exercises will mainly be utilized during the development or refinements of the Pandemic Response Plan. More specifically, these exercises will be utilized by NRC leadership to develop and fine-tune policy and explore improvement to the program prior to a change to the Plan. This type of exercise will be used on an as needed basis.

F-5.2   Functional Exercises

A functional exercise is a fully simulated interactive exercise that tests the capability of an organization to respond to a simulated event. The exercise tests multiple functions of the organization's operational plan. It is a coordinated response to a situation in a time-pressured, realistic simulation.

For purposes of pandemic planning, the functional exercise will be utilized to test and validate either all or only specific components of the Pandemic Response Plan. This type of exercise could be used to facilitate a test and validation of most or all aspects of the program with limited external participation. A functional exercise that tests most or all components of the Plan may be utilized to meet the annual exercise requirement.

F-5.3   Exercise Assessment

Assessment of the exercise is the process of observing and recording exercise activities, comparing the performance of the participants against the objectives, and identifying strengths and weaknesses. Each exercise (table top or functional) will be evaluated and an after action report written to document its outcome.

ANNEX G: NECESSARY RECORDS AND DATABASE

G-1   Purpose

Records essential to operation and restoration of agency functions during an emergency are considered vital records. They are categorized by the National Archives and Records Administration (NARA) as either (a) emergency operating records or (b) legal and financial rights records. NSIR is responsible for the former and OIS for the latter; see Section 9 and Management Directive 3.53, "NRC Records Management Program."

This Annex also addresses other records that may not meet NARA's criteria for "vital records" but that would be, nevertheless, important during a Pandemic. NRC Headquarters or and Regional Offices, should decide which records are important enough to warrant special care and provide for protection and access.

G-2   Applicability and Scope

This Annex applies to agency records created by NRC as part of NRC activities in preparation for or during pandemic situations. Anticipated staffing shortages during the pandemic could delay the normal processing of documentation (putting documents into ADAMS).

G-3   Objectives

Records management not only ensures that essential documents are readily available to support a response to a pandemic or other emergency, but also preserves the bases for NRC decisions, licensing actions, and NOEDs made during a pandemic situation.

G-4   Necessary Records

G-4.1 Pandemic Emergency Operating Records

NRC vital emergency operating records are identified in this Plan as the Plan itself and other documents created to support necessary functions during a pandemic. Records to be maintained include records regardless of media, essential to the continued functioning or reconstitution of the NRC during and after a pandemic response. Examples of such records include emergency plans, orders of succession, delegations of authority, and related records of a policy nature that provide agency staff with essential guidance and information

G-4.2 Legal and Financial Rights Records

Legal and financial rights records are those required to preserve the rights and interests of individuals and the Federal Government. Examples of records in this category include employee profiles and payroll histories. Other records in this category may include personnel security access authorizations; accounts receivable; contracting and acquisition files; official personnel files; social security, payroll, retirement, and insurance records; and property management and inventory records. OIS will issue an annual request to appropriate Offices to submit their "Vital Records Plan" and identify the legal and financial rights records they require to continue operating during an emergency and plans for ensuring backup copies. Because of the continual move toward electronic recordkeeping, backup copies of required records may be provided to OIS for safe storage and emergency access or stored at some other offsite facility by the responsible office.

G-4.3   Important Records

Unlike NARA's classification of emergency operating records, and legal and financial rights records, "important records" is an NRC concept intended to provide for identification of documents that are not absolutely essential but that could greatly aid the performance of emergency functions. Examples might be historical documents that describe precedents, or complete file copies of incoming directives that have already been recognized in essential procedures, or licensee correspondence. Offices should identify and protect these records as they deem appropriate.

ANNEX H: PANDEMIC EXECUTIVE TEAM RESPONSE

H-1   Purpose

If a pandemic occurs, the NRC must maintain management continuity to ensure performance of the Pandemic Priority Functions (PPFs) and to address other issues that cannot be predicted except in the most general terms, including possible concurrent implementation of other emergency plans. The purpose of this Annex is to provide procedures for organizing, establishing, and maintaining a Pandemic Executive Team (PET) to support the operations under pandemic conditions outlined in Section 3, "Concept of Operations," of the Pandemic Response Plan.

H-2   Applicability and Scope

This Annex applies to potential members of the PET.

H-3   Objectives

The information in this Annex is intended to identify potential PET members, to prepare them to carry out emergency responsibilities and to help inform their actions while doing so.

H-4   Membership

Sufficiently early warning of a pandemic emergency will allow a PET to be established, and perhaps exercised, in advance. As a pandemic progresses or as concurrent emergencies occur, the PET must decide how best to reorganize or expand its membership. Any of the members may be represented by duly designated successors in accordance with Sections 3.6 and 3.7.

H-4.1 PET Leader

The PET Leader (PETL) will be the Chairman or designee (typically a member of the Commission). The Chairman or designee may exercise all functions of the Commission pertaining to an emergency in accordance with provisions of Section 3 of Reorganization Act No. 1 of 1980. In the event that the circumstance of the pandemic or an event during a pandemic require initiation of the COOP Plan, the order of succession established in the COOP Plan will be followed. The Deputy Executive Director for Information Services and Administration (DEDIA) is also the Designated Official in the Headquarters Occupant Emergency Plan for evacuation and re-occupation decisions at Headquarters. The Regional Administrators are Designated Official in Regional Occupant Emergency Plan for evacuation and re-occupation decisions at the Regions.

H-4.2 Pandemic Executive Team Members

In addition to the Chairman or designee (typically a member of the Commission) as the PETL, the rest of the PET membership is represented by the following positions:

• Executive Director for Operations

• Deputy Executive Director for Reactor and Preparedness Programs

• Deputy Executive Director for Materials, Research, State, and Compliance programs

- Deputy Executive Director for Information Services and Administration and Chief Information Officer

- Regional Administrators
  [Provides information about Regional programs and staff concerning PPFs]

- General Counsel
  [Provides legal advice from the Office of the General Counsel (OGC)]

- Director, Office of Information Services
  [Provides information regarding internal NRC information systems and network infrastructure]

- Chief Financial Officer
  [Provides financial management direction and support]

- Director, Office of Administration
  [Provides facilities maintenance, facilities security, contract, and critical administrative services direction and support]

- Director, Office of Human Resources
  [Provides human capital support/advice and status information for employees]

- Director, Office of Public Affairs
  [Provides status information for the media and the public]

- Director, Office of Nuclear Reactor Regulation (NRR)
  [Provides advice and support concerning NRR PPFs and staff]

- Director, Office of Nuclear Material Safety and Safeguards (NMSS)
  [Provides advice and support concerning NMSS PPFs and staff]

- Director, Office of Nuclear Regulatory Research (RES)
  [Provides advice concerning RES staff availability and support to others' PPFs]

- Director, Office of Nuclear Security and Incident Response (NSIR)
  [Provides advice and support concerning NSIR PPFs and staff]

The PET Leader may choose to add other members as necessary and appropriate.

H-4.3   Assistants

The PET may be advised by individuals with specialized skills needed at the time to maintain PPFs. Among those that may be needed most frequently are:

- Director, NSIR Division of Security Operations (NSIR/DSO)
     [Provides security interface with licensees and information security]

- Member, Intelligence Liaison and Threat Assessment Branch (NSIR/DSO/ILTAB)
     [Provides nuclear safeguards advice and threat assessments]

- Director, NSIR Division of Preparedness and Response (NSIR/DPR)
     [Provides incident response policies and procedures, information about Federal commitments, and licensee preparedness information]

- Headquarters or Regional Operations Officers (HOOs or ROOs)
     [Contacts key personnel and establishes teleconferences]

- Director, OIS / Infrastructure and Computer Operations Division (OIS/ICOD)
     [Provides administration and support for NRC's telecommunications, computer operations, and internal network]

H-5   Management and Operations

The PET must test in advance provisions for distributed management and operations as proposed in Section 3.3, "Concept of Operations." The proposed concepts and any proposed alternative arrangements for maintaining management and operations should be examined for suitability and effectiveness, then periodically reexamined as new technology becomes available. The need to maintain provisions for implementing a practical concept is likely to continue for some time. The provisions must be ready to function quickly and effectively, especially during the early, most confusing stages, to provide adequate communications during a pandemic and in combination with any other licensee incident, continuity of operations issue, or Federal emergency situation.

ANNEX I: RECONSTITUTION PROCEDURE

I-1 Purpose

This Annex outlines steps necessary to reconstitute the full spectrum of NRC operations after a pandemic has passed.

I-2 Objectives

When the Chairman or other authorized person ascertains that the pandemic has ended, this procedure will prompt the initiation and coordination necessary to return to normal operations.

I-3 Reconstitution

This reconstitution procedure will commence when the Chairman or other authorized person ascertains that the pandemic has ended and serious disruption is unlikely to recur. This decision can only be reached once approval is received from the appropriate Federal and local health officials.

When the Chairman, or designee (typically a member of the Commission), decides that NRC can begin reconstitution to resume normal operations, the following will be executed:

• Pandemic Executive Team Leader (PETL) serves as the Reconstitution Manager.

• The PETL, in consultation with the rest of the Pandemic Executive Team (PET) oversees the orderly resumption of NRC functions, and restoration of personnel, equipment, and records, if applicable.

• Each organizational element, in turn, designates a Reconstitution Point of Contact (POC) to work with Administration and to update Office personnel on developments regarding reconstitution.

• The PET will develop a plan to transition from pandemic status to normal operation status, once the pandemic is declared over or contained. Activities associated with planning for reconstitution include:

    - Developing a time phased plan, listing functions and projects in order of priority for resuming normal business operation.

    - Developing a plan to terminate special activities instituted for the pandemic response.

    - Develop a plan, as necessary, for restructuring the staff.

• Prior to resuming normal operations, HR conducts appropriate health/sanitation assessments.

• Develop a time frame for terminating additional HR and telework flexibilities implemented during a pandemic.

The checklist below will assist the PET while working towards reconstitution. This checklist provides key elements necessary for reconstitution to take place, and will help in the creation of a plan and schedule to return to normal business.

Checklist

NRC Reconstitution	
Equipment	Restore equipment for normal operation. Reference Section 6.3 for essential equipment needed to perform essential functions.
Necessary records and databases to conduct Pandemic Priority Functions (PPFs)	Restore necessary files, records, and databases to the normal operation.
Communications	Ensure required communication systems are operational for the normal operation.
Personnel	Inform NRC personnel that the pandemic is over. Provide instructions for resumption of normal business including return to normal duties and applicable workplace schedule and leave policies.
NRC After Action Activities	
After Action Report	Conduct a "lessons learned" review of the pandemic operations and effectiveness of plans and procedures to identify areas for improvement.
Update Plans and Procedures	Work to develop remedial action plans and update pandemic documents as necessary.

I-4 Reconstitution Guidance

I-4.1   Health Threat Assessment

An updated health threat assessment report should be obtained from local and federal health agencies. These reports should address the following question:

•   Is there a continued health threat to, or in the vicinity of, the NRC or Regional Offices?

I-4.2   Health Considerations

Determining whether the NRC facilities are contamination free is critical to the reconstitution efforts. Water and air quality should be part of the inspection. The following questions should be considered:

•   Are the NRC facilities free of contaminants or pathogens? If left unoccupied for an extended time, are building(s) safe for re-occupancy?

•   What if any, infection prevention, screening and/or social distancing guidelines should be continued?

I-4.3   Resource Requirements

The following are considerations regarding resource requirements:

•   What testing is required to verify operability of resources?

- What resources can be shared among/between organizations?

- What immediate and long term equipment acquisitions are required to expedite the agency's return to normal operation?

ANNEX J: MULTI-YEAR STRATEGY AND PROGRAM MANAGEMENT PLAN

J-1   Purpose

This guide provides instructions for ensuring the Pandemic Response Plan is updated and maintained as a useful document for the NRC.

This Annex outlines requirements to:

- Designate and review priority functions and resources

- Define short and long-term pandemic goals and objectives

- Forecast pandemic planning budgetary requirements

- Identify pandemic program issues, concerns, potential obstacles, and the strategy for addressing these, as appropriate

J-2   Applicability and Scope

To support its mission, NRC must be operationally prepared to continue operations during an extended disruption of normal operations as would occur in a pandemic situation. Included in this responsibility is the requirement to formulate guidance and establish common objectives in developing viable, executable pandemic plans, and to facilitate interagency coordination as necessary.

J-3   Objectives

This document contains the strategy and program management concepts that will be used to ensure and improve upon the organization's pandemic response capability over the next 5 years.

J-4   Program Management and Responsibilities

NSIR has primary responsibility for maintaining the Pandemic Response Plan. Support from other Offices responsible for their respective PPFs (e.g., ADM, HR, NMSS, NRR, OCFO, OE, OGC, OIS, OPA, Regions, RES, STP) will be required for specific parts of this Plan. These Offices are expected to incorporate the necessary resources required to support this Plan in their budgets and Operating Plans.

ANNEX K: PANDEMIC TELEWORK PLAN

K-1   Purpose

The purpose of this Annex is to establish the Nuclear Regulatory Commission's (NRC) Telework plan for a pandemic. The plan is to increase the capacity of simultaneous access to NRC networks, through the high-speed Internet-based Remote Access System, that will enable NRC staff to access records and databases to perform Pandemic Priority Functions (PPFs) from a remote location. The immediate goal is to enable about 1,000 NRC staff to have this simultaneous access capability as soon as possible. This number is based on the planning assumption of experiencing about 40 percent absenteeism during the peak periods of a pandemic wave. The staff estimates that about 675 simultaneous access capacity will be available by fall of 2006 and the remaining 325 by sometime afterwards. The long-term goal is to expand this capacity even further for additional accommodation as allowed by increased budget and continued improvement in technology and equipment.

The Pandemic Telework Plan provides a management framework establishing guidance to assist NRC leadership in sustaining the agency's PPFs if normal operations are not feasible. The plan provides for greater flexibility than NRC flexiplace policies applicable during normal operations in order to allow NRC to make the fullest possible use of resources available for accomplishing priority functions during a pandemic. The plan also provides that staff members who are expected (or wish to be able) to telework during a pandemic, will participate in pandemic preparedness orientation/training.

K-2   Applicability and Scope

The provisions of this plan are applicable to NRC staff members assigned to telework during a pandemic.

K-3   Objectives

The implementation of a robust telework program during a pandemic will enable NRC to continue priority functions while accommodating employees' needs. In addition to contributing to social distancing and infection control, teleworking during a pandemic will enable a larger number of NRC employees to continue to work productively on priority functions than would otherwise be possible.

Expanded telework capability will allow NRC to rely on staff who would otherwise be unavailable, and allow staff to continue to work rather than use leave or, possibly, excused absence. Employees who are not incapacitated may be able to continue working through telework when, for example, they:

•   need to remain home to care for family members who are ill or children when schools close,

•   may be contagious,

•   need to take extra precautions to avoid exposure to infection for reasons such as compromised immune systems, or

•   are unable to reach work because public transportation is severely restricted.

K-4 Telework program

In conjunction with Office-specific planning to continue priority functions and shed lower priority work during a pandemic, each Office or Region should:

- identify specific functions that may be performed through telework and staff who are prepared to perform such functions via telework. Staff at various levels may be authorized to perform telework for this purpose if it is practical to accomplish the priority functions in this manner,

- encourage employees to consider telework and obtain remote access to agency information systems, and

- test the practicality of performing the functions via telework through regularly scheduled or project-based flexiplace arrangements.

During a pandemic, managers will have broad discretion to authorize employees to perform priority functions through telework to the extent the manager deems accomplishment of the work in this manner feasible. This includes the ability to permit telework essentially full-time, implement informal approval processes, and implement more flexible work schedule options in order, for example, to enable employees to telework during periods when they need to care for dependent children at home. However, time actually spent in non-work activities such as caring for a child or for a family member who is ill may not, of course, be considered work time.

K-4.1   Pandemic Telework Plan Activation

Upon activation of the Pandemic Response Plan, managers may authorize NRC staff members to deploy to their homes or other telework locations to perform tasks necessary to continue PPFs. If the number of authorized potential teleworkers exceeds NRC system capacity, Offices and Regions should work with the Pandemic Executive Team (PET) to assign priorities for telework.

K-4.2   Pandemic Telework Plan Operation

After activation of the telework plan, Offices and Regions will continue to monitor telework to ensure that priority functions are being accomplished effectively, that staff are using time productively, to revise assignments in order to respond to changes in specific work needs, and to adjust to fluctuating employee needs, availability, or requests for telework.

K-4.3   Reconstitution

Pandemic telework begins with the recognition of the pandemic situation and ends when the pandemic has abated. The agency will announce when to begin reconstitution of normal business operations, which could take an extended period.

Activities associated with termination of pandemic operations and resumption of normal operations includes the following:

- Pandemic telework staff members will be notified by respective Office management, that the pandemic no longer exists and will be provided instructions for the resumption of normal operations.

- Pandemic telework staff members will take part in an orderly return to the NRC Headquarters Complex or to Regional Offices.

- Pandemic telework staff members will participate in a critique of Pandemic Response Plan procedures and effectiveness to identify areas for correction and to develop remedial plans.

K-4.4   Telework Logistics

In most cases, employees will rely on their home computers, Internet access, and telephones to perform telework during a pandemic. As appropriate, the agency may supply software, telephone cards, copies of files or references, or other support for telework efforts.

The following are the logistical elements for the Telework Staff to operate from their remote locations:

- A computer (either a desktop or laptop with at least the capability to perform dial-up networking).

- Access to the Internet (dial-up or broadband).

- Telephone service (either wired or cellular are required). NRC should provide automated answering and message forwarding capability that can be modified by NRC users to provide for the continuation of communications in the absence of NRC telephone operators.

- Depending on the work that needs to be performed, a CITRIX account (or Verisign certificate for broadband) may be required for remote access to programs, files, and data necessary to perform work.

- Ability to participate in a teleconference or videoconference.

- Guidelines for use of CITRIX (covering topics such as making efficient use of access, security, software installation).

- Remote access to files, necessary to do their work, must be stored on a network drive.

K-4.5   Telework Testing, Training, and Exercise

Tests, training, and exercises (TT&E) are an essential part of NRC's strategy to develop and maintain its pandemic capability. TT&E of the Pandemic Telework plan will help ensure personnel have been trained and that adequate resources have been developed, identified, and pre-positioned to support pandemic operations. The TT&E for the pandemic telework program will be established and tracked under Annex F, "Pandemic Testing, Training, and Exercise Program."

ANNEX L: HUMAN CAPITAL

L-1   Purpose

The purpose of this Annex is to establish the Nuclear Regulatory Commission's (NRC) Human Capital plan for a pandemic. NRC's plans for responding to a pandemic interact with and depend upon human capital management. NRC managers and other leadership should be familiar with the many human capital resources and flexibilities that exist to assist management and employees in the event of pandemic plan activation. This plan will provide a management framework establishing guidance to assist NRC leadership in sustaining the agency's priority functions while responding to extraordinary employee needs.

The plan provides for greater flexibility with regard to assignment of duties, leave, and work scheduling in order to allow NRC to make the fullest possible use of resources available for accomplishing priority functions during a pandemic.

The plan provides for identifying employees with the skills and experience to perform priority functions and/or providing cross-training to prepare employees to perform such functions, and communicating in advance of and during a pandemic with staff and the union about expectations, human resource policies, and flexibilities.

L-2   Objectives

The objective of this Annex is to provide broad guidance to NRC management and employees regarding human capital issues, flexibilities, and strategies relevant in the event of a pandemic.

L-3   Human Capital

L-3.1   Working Assumptions

Absenteeism will be attributable to a variety of factors. For example, the employee may:

• be ill,

• need to remain home to care for family members who are ill or children when schools close,

• have been exposed or potentially be contagious although not ill,

• need to take extra precautions to avoid exposure to infection for reasons such as compromised immune systems,

• be unable to reach work because public transportation is closed,

• feel safer at home, or

• be participating in volunteer activities in support of the community or reserve service.

Unless contrary to medical advice, or directed by Office- and Region-specific procedures that implement the Pandemic Response Plan, available employees would continue to work at NRC facilities during a pandemic. Employees would also telework to a greater extent than usual. See Annex K, "Pandemic Telework Plan."

During a pandemic, the employees available to perform priority functions are likely to change on a day-to-day basis as they or their family members become ill or recover. Employees' assignments are, therefore, likely to vary throughout the pandemic.

L-3.2   Preparation

In conjunction with Office-specific planning to continue priority functions and shed lower priority work during a pandemic, each Office or Region will perform the following actions:

• Identify employees with the skills and experience needed to perform Pandemic Priority Functions (PPFs). The Strategic Workforce Planning system will support such efforts.

• Identify alternative sources of skills if insufficient back-up is available among employees. Such sources might include, for example employees of other agencies or retired NRC employees.

• Provide cross-training as appropriate.

In advance of a pandemic, NRC will communicate information and/or train employees about:

• the importance of emergency planning including emergency plans for families,

• infection control, respiratory hygiene, and social distancing guidelines,

• alternatives for contacting work (reporting their status) and obtaining information from NRC in the event of emergency,

• expectations that employees may be asked to perform duties other than those in their position descriptions during a pandemic, and

• options and flexibilities in human resources policies.

This will include an appropriate dialogue with the National Treasury Employees Union (NTEU).

L-3.3   Human Capital Resources and Flexibilities

In addition to current human resource policies and resources (such as various leave programs, the Employee Assistance Program, Health Center Programs, benefits programs, and work schedule programs), managers will have broader discretion during a pandemic to do the following:

• Assign employees to perform priority functions outside the employees' position descriptions.

• Authorize employees to work more varied work schedules to the extent the manager deems accomplishment of the work feasible.

• Approve leave based on more liberal policies for reporting and approving absence

• Approve premium pay as needed and appropriate to continue priority functions.

In addition, the agency will perform the following:

- Authorize an annual rather than biweekly premium pay cap for some or all employees working during a pandemic.

- Implement infection control and social distancing guidelines during a pandemic.

- Based on medical guidelines, determine any appropriate criteria for screening and excusing or dismissing individuals from facilities if they may be ill and for returning to work after illness or exposure to illness.

- As appropriate, incorporate in its plan guidance from the U.S. Office of Personnel Management related to human capital flexibilities and policies appropriate to a pandemic.

L-3.4 Management Responsibilities

NRC Management is responsible for communicating information and instructions to their employees during pandemic operation. Management must:

- be fully informed and understand human capital tools, flexibilities, and strategies;

- review regularly and update human capital information and resources to assure that the agency's policies remain current and relevant (this includes human capital procedures, guidelines, and resources to ensure policies are current and relevant to the NRC Pandemic Preparedness Plan);

- conduct regular exercise and simulation within their Offices, including scenarios involving telework and remote decisionmaking;

- ensure staff have a clear understanding of what they are to do in a pandemic:

- maintain specific protocols for designating and activating special needs employees within their Office; and

- develop, review, and update pandemic guides as needed.

Managers should:

- determine when telework is appropriate for a pandemic, utilizing Annex K, "Pandemic Telework Plan";

- discuss with employees alternatives regarding work, leave, and scheduling that may be applicable during a pandemic; and

- ensure that there are viable methods of providing guidance to employees who are present, on telework, or not working during a pandemic.

NRC staff will receive human capital and other instructions from the agency upon notification of pandemic activation. The agency will use electronic and telephone as well as Office management channels of communication.

L-3.5 Employee Responsibilities

Employees have a key role in assuring the health of themselves and other employees in the workspace. Employees should:

- become familiar with agency procedures such as the NRC Pandemic Preparedness Plan and the means of notification that each Office will use to inform and instruct employees;

- become familiar with and follow health guidance on prevention of spread of infection and sanitation; and

- work with managers to identify, in advance to the extent possible, any flexibilities related to work scheduling, location (such as telework), leave needs, or other working conditions that the employees believe will help the managers plan or help the employees continue working while meeting family responsibilities or other personal needs during a pandemic.

L-3.6   Special Needs Employees

Office management will work with the Office of Administration (ADM) and Office of Human Resources (HR) to ensure that special needs employees' issues are addressed during implementation of the Pandemic Response Plan. Procedures will follow established NRC and OPM guidelines and directives.

L-3.7   Pandemic Human Capital Plan Activation

Upon Pandemic Response Plan activation, managers may exercise additional approved human resource flexibilities.

L-3.8   Pandemic Human Capital Plan Operation

After activation of the pandemic human capital plan, Offices and Regions will continue to ensure that priority functions are being accomplished effectively and that staff are using time productively; to revise assignments in order to respond to changes in specific work needs; to extend or withdraw approval of work scheduling, leave, and premium pay as appropriate to accomplish priority functions while accommodating employee needs to the extent practical; and to adjust to fluctuating employee needs, availability, or requests.

L-3.9   Reconstitution

Pandemic human capital flexibilities begin with the recognition of a pandemic situation and end when the pandemic has abated. The President, or a designated representative, will declare the start and end of Regional or national pandemic. The NRC Chairman, or designee (typically a member of the Commission), will declare the start and end of Pandemic Response Plan implementation within the agency.

The main aspect of reconstitution for a pandemic is resuming normal business operations. Activities associated with termination of pandemic operations and resumption of normal operations includes the following:

- Staff members will be notified by respective Office management, that the pandemic no longer exists and will be provided instructions for the resumption of normal operations.

- Staff members will take part in an orderly return to their regular functions, workplaces, and/or schedules.

Employees will participate in a critique of Pandemic Response Plan procedures and effectiveness to identify areas for correction and to develop remedial plans.

ANNEX M: DEFINITIONS AND ACRONYMS

M-1   Purpose

The terms and acronyms, used within the Pandemic Response Plan, are defined here as a means to facilitate the reader's understanding of its contents.

M-2   Definitions

Capabilities	Communication, facilities, information, trained personnel, and other assets necessary to conduct the agency's Pandemic Priority Functions (PPF).
Alternate COOP Site	A site from which NRC can maintain its minimum essential functions in the event of a situation that threatens the continuity of NRC operations.
COOP, COG, ECG	Interrelated Federal policy concepts for ensuring the Continuity of Operations (COOP) within departments and agencies, the Continuity of Government (COG) within each branch of the Government, and Enduring Constitutional Government (ECG) for the entire Government throughout and following serious disruptive situations.
COOP Plan	A plan that provides for the continuity of essential functions of an organization in the event of an emergency that prevents occupancy of its primary facility. The Plan provides the organization with an operational framework for continuing the agency's Mission Essential Functions when normal operations are disrupted or otherwise cannot be conducted from its primary facility.
Designated Official	The senior decisionmaking official in Occupant Emergency Plans maintained by ADM and each Regional Office.
Essential Functions	Functions that enable Federal Executive Branch agencies to provide vital services, exercise civil authority, maintain the safety and well being of the general pubic, and sustain the industrial/economic base during an emergency.
ETS	Emergency Telecommunications System (which utilizes the public switched network, in part, to communicate with licensees; it includes options such as satellite communications)
Initiation	The initiation of the process of executing the NRC Pandemic Response Plan
National Capital Region (NCR)	Includes the District of Columbia; Prince Georges and Montgomery Counties in Maryland, Fairfax, Arlington, and Prince William Counties, and other Independent Cities in those counties in Virginia.
National Essential Functions (NEFs)	That subset of Government functions that are necessary to lead and sustain the country during an emergency and, therefore, must be supported through department and agency continuity capabilities. The NEF are the primary focus of the president and the national leadership in the event, and in the aftermath, of an emergency. They are not new authorities, requirements, or functions.
Non-specific Threat	Refers to threat conditions being implemented for a national declaration.

Point of Contact (POC)	The designated individual from each NRC Headquarters Office whose duties involve coordination of the NRC COOP Plan for his/her respective origination.
Pandemic Executive Team (PET)	Agency's special management team to lead the agency through a pandemic.
PPFs	Core NRC functions (reduced set of day-to-day NRC functions) that must be carried out by NRC during a Pandemic situation. These include COOP Plan's Priority Mission Essential Functions and some Secondary Mission Essential Functions
Priority Mission Essential Functions (PMEFs)	Those MEFs that must be performed to support or implement NEFs before, during, and in the immediate aftermath of and emergency. Generally PMEFs must be uninterrupted, or resumed during the first 24-48 hours after an emergency and conducted through full resumption of normal business.
Occupant Emergency Coordinator	Deputy Executive Director for Information Services and Administration and Chief Information Officer is the designated Official in the Occupant Emergency Plans to advise the Designated Official.
Specific Threat	Refers to threat conditions being implemented for specific Region or sector.
Supporting Activities	Those specific activities that a department or agency must conduct in order to perform its PPFs.
Participating Offices	Offices with an active primary or support role in maintaining, supporting, or implementing this Plan. They are ADM, HR, NMSS, NRR, NSIR, OCFO, OIS, OCM, OEDO, OIP, RES, and all Regional Offices.

M-3   Acronyms

ADM	Office of Administration
CAS	Central Alarm Station, operated by DFS 301-415-2000
CSC	NRC Customer Support Center
DC	Division of Contracts, ADM
DEDIA/CIO	Deputy Executive Director for Information Services and Administration and Chief Information Officer
DEDMRS	Deputy Executive Director for Materials, Research, State and Compliance Programs
DEDR	Deputy Executive Director for Reactor and Preparedness Programs
DFS	Division of Facilities and Security, NSIR
DHS	Department of Homeland Security which now includes Federal Emergency Management Agency, (FEMA)
DNS	Division of Nuclear Security, NSIR
DOI/NBC	Department of Interior / National Business Center
EAP	Employee Assistance Program (maintained by HR)
ECS	Emergency Communications System
EDO	NRC Executive Director for Operations
EO	Executive Order from the President
EPA	Environmental Protection Agency
ERDS	Emergency Response Data System
ETS	Emergency Telecommunications System
FEMA	Federal Emergency Management Agency (now part of DHS)
FFS	Federal Financial System
FPC	Federal Preparedness Circular issued by FEMA (now DHS)
FPPS	Federal Personnel Payroll System
FPS	Federal Protective Service
FRP	Federal Response Plan (predecessor to the NRP)
FTS	Federal Technology Service
FTS/WITS	Federal Technology Service / Washington Interagency Telecommunications System
GETS	Government Emergency Telecommunications Service
GSA	General Services Administration

HERO	Headquarters Emergency Response Officer
HDO	Headquarters Duty Officer
HF/ALE	High Frequency / Auto Link Establishment
HHS	Department of Health and Human Services
HOC	NRC Headquarters Operations Center
HOO	NRC Headquarters Operations Officer, NSIR/DIRO 301-816-5100
HR	Office of Human Resources
HRMS	Human Resource Management System
HSDN	Homeland Secure Data Network
HSPD	Homeland Security Presidential Directive
IAEA	International Atomic Energy Agency
ILTAB	Intelligence Liaison and Threat Assessment Branch
IT	Information Technology
JWICS	Joint Worldwide Intelligence Communications System
LAN	Local Area Network
Licensee	Used in this document to designate any entity regulated by NRC
NARA	National Archives and Records Administration (which administers the Federal vital records program)
NAWRA	National Warning System
NCS	National Communications Systems
NIPP	National Infrastructure Protection Plan
NMSS	Office of Nuclear Materials Safety and Safeguards
NOC	NRC Network Operations Center
NRP	National Response Plan
NRR	Office of Nuclear Reactor Regulation
NSIR	Office of Nuclear Security and Incident Response
OIS	Office of Information Services
OCFO	Office of the Chief Financial Officer
OGC	Office of the General Counsel
OIP	Office of International Programs
OWFN, TWFN	NRC Headquarters buildings: One White Flint North and Two White Flint North

PBPM	Planning, Budgeting, and Performance Management
PDD	Presidential Decision Directive
PEADS	Presidential Emergency Action Documents
PET, PETL	Pandemic Executive Team (Leader)
PSTN	Public Telephone Switch Network
RDO	Regional Duty Officer, on duty or on call in each Regional Office
RES	Office Nuclear Regulatory Research
ROO	Regional Operations Officer
SIPRNET	Secret Internet Protocol Router Network
SPS	Secure Payment System
STP	State and Tribal Programs
TMC	Telecom Management Center
USDA	United States Department of Agriculture
WAN	Wide Area Network
WITS	Washington Interagency Telecommunications System
WPS	Wireless Priority Service