

EDO Principal Correspondence Control

FROM: DUE: 12/07/06

EDO CONTROL: G20060936

DOC DT: 11/11/06

FINAL REPLY:

EDATS: SECY-2006-0184

David C. McKee  
Emergency Management Agency  
Town of Kingston, Massachusetts

TO:

Chairman Klein

FOR SIGNATURE OF :

\*\* GRN \*\*

CRC NO: 06-0576

Zimmerman, NSIR

DESC:

ROUTING:

Review of Emergency Planning

Reyes  
Virgilio  
Kane  
Silber  
Johnson  
Cyr/Burns  
Collins, RI  
Miller, FSME

DATE: 11/16/06

ASSIGNED TO:

CONTACT:

NSIR

Zimmerman

SPECIAL INSTRUCTIONS OR REMARKS:

# EDATS

Electronic Document and Action Tracking System

**EDATS Number:** SECY-2006-0184

**Initiating Office:** SECY

## General Information

**Assigned To:** NSIR

**OEDO Due Date:** 12/7/2006 5:00 PM

**Other Assignees:**

**SECY Due Date:** NONE

**Subject:** Review of Emergency Planning

**Description:**

**ADAMS Accession Numbers**

**Incoming:**

**Response:**

**Package:**

## Document Information

**Originating Organization:** Emergency Management  
Agency, Town of Kingston, Massachusetts

**Originator Name:** David C. McKee

**Incoming Task Received:** Letter

**Date of Incoming Document:** 11/11/2006

**Document Received by OEDO Date:** 11/16/2006

**Date Response Requested by Originator:** 12/7/2006

**Addressee:** Chairman Klein

## Process Information

**Action Type:** Letter

**Priority:** Medium

**Sensitivity:** None

**Urgency:** NO

**Signature Level:** NSIR

**OEDO Concurrence:** NO

**OCM Concurrence:** NO

**OCA Concurrence:** NO

**Special Instructions:**

## Other Information

**Cross Reference Number:** G20060936,LTR-06-0576

**Related Task:**

**File Routing:** EDATS

**Agency Lesson Learned:** NO

OFFICE OF THE SECRETARY  
CORRESPONDENCE CONTROL TICKET

Date Printed: Nov 15, 2006 11:24

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**PAPER NUMBER:** LTR-06-0576 **LOGGING DATE:** 11/15/2006  
**ACTION OFFICE:** EDO

**AUTHOR:** David McKee  
**AFFILIATION:** MA  
**ADDRESSEE:** Dale Klein  
**SUBJECT:** Provide comments on how state, local and federal government address "emergency planning"

**ACTION:** Appropriate  
**DISTRIBUTION:** RF

**LETTER DATE:** 11/11/2006  
**ACKNOWLEDGED:** No  
**SPECIAL HANDLING:** Made publicly available in ADAMS via EDO/DPC

**NOTES:**

**FILE LOCATION:** ADAMS

**DATE DUE:** **DATE SIGNED:**

EDO --G20060936

# TOWN of KINGSTON, MASSACHUSETTS

## Emergency Management Agency

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November 11, 2006

Dr. Dale E. Klein  
Chairman  
U.S. Nuclear Regulatory Commission  
11555 Rockville Pike  
Rockville, MD 20852

Dear Dr. Klein:

As Emergency Management Director for the town of Kingston for more than four years, I am submitting the following comments regarding the manner in which I believe our local, state and federal governments address Emergency Planning. I ask that you view my comments as purely constructive criticism.

It is quite apparent to me that each time we hold a "Graded-Exercise," our primary goal is to complete the exercise without receiving ARCAs or deficiencies. Our secondary objective is to learn from our mistakes and weaknesses and thus hopefully improve our understanding of our implementing procedures. One hopefully learns from their errors.

In my opinion, during the 18-month period following a graded-exercise, continuous EOC training does not take place. However, during the six-month period previous to the Graded-Exercise, all agencies go into training overload mode as we once again become paranoid about the feared ARCA. During that period, we are expected to increase training. Along with group training, we offer refresher training to all EOC members and one-on-one remedial training if necessary.

The "Extent of Play" information is distributed to "players" so that everyone is aware of exactly what categories or procedures the evaluators will be testing and thus rating. In some instances, if an individual were to make a noticeable mistake, he/she in the presence of an evaluator would be given the opportunity to correct that error on the spot so that it would not be held against the local agency. However, if an ARCA were to be assigned to that local agency, both the utility and MEMA would literally lobby to have the ARCA removed. In my opinion, virtually every individual within the emergency management system, that is federal, local and state agencies as well as the utility system play primarily

to achieving an "A" rather than attempting to recognize that actual changes may need to be noted and updated in the plan and procedures.

It seems to me that nobody is willing to accept a grade lower than an "A" whereas it may signify that the plan/implementing procedures are flawed and that modifications are required. Many participants in drills/exercises are petrified that they will be singled out as being responsible for an ARCA being assigned to their town. As we are well aware, it is human nature that no individual looks forward to being singled out as the one who made an error.

We have always prepared for our drills and exercises with the "report card" in mind rather than actually preparing for a simulated emergency or disaster. Even after 9/11 and Katrina, we have not learned that an "A" on everyone's "report card" does not mean that emergency agencies are necessarily doing a first-rate job. In my estimation, it only means that we are well-prepared to address the particular extent of play for the simulated scenario.

In a related matter, I strongly feel that the process that we use during the annual review of our local plans and procedures is extremely flawed. We are requested to make changes as necessary on an annual basis. Practically every change the town of Kingston wishes to make except spelling and grammar is totally ignored. Whereas we are told that most changes can not be made because by doing so the plan and procedures of other agencies would have to be changed, our changes which we deem as both important and necessary are rarely made. Consequently, I can honestly comment that our plan and procedures are for the most part rubber-stamped on an annual basis.

In 2006, we were informed that maintenance only – for example, a phone number change or a similar change is all that will be changed from this point on. As a result, all other submitted changes – and there were many - were totally ignored. We had taken the time to review and discuss individual procedures with our EOC members. The changes that they suggested were very worthwhile. Needless to say, our members were shocked and dismayed that none of the work that we had accomplished was reflected in their procedures. In fact, many of our procedures were returned to us as the 2005 versions. In my opinion, that sends the wrong message to the participants who are expected to perform well. Therefore, may I say, they do not hold the state agency in high regard. Also, supposedly "concepts" in our Implementing Procedures were changed; however, we have never been notified of the concept changes. Additionally, we were advised to use implementing procedures "as is" in the drill and the exercise with incorrect information and information that required more clarity. This is totally unacceptable. Thus, it is crucial that an independent, professional review of our plan and implementing procedures be conducted. The time is long overdue.

In closing, I would again request that you accept these comments as constructive criticism resulting from my years of observation. Please conduct a serious review of the manner in which drills and exercises are run and consider the effect of placing primary importance on the learning experience instead of the dreaded ARCAs. I truly believe that

if you expect towns to take time out to seriously review the Radiological Emergency Response Plan and the Implementing Procedures on an annual basis, MEMA should demonstrate more concern in relation to listening to the individuals involved and correcting their Plan and the Implementing Procedures.

Thank you for considering these comments.

Very truly yours,

A handwritten signature in black ink that reads "David C. McKee". The letters are cursive and somewhat slanted to the right.

David C. McKee  
Fire Chief/Emergency Management Director