Pennsylvania Department of Environmental Protection
Bureau of Radiation Protection
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SUBJECT: Comments on the Security Threat-Based Emergency Preparedness Drill and Exercise Initiative

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The Pennsylvania Bureau of Radiation Protection welcomes the opportunity to comment on: 1.) the status and lessons-learned from the "off-year" security threat-based Emergency Preparedness drills, including scenario development, and 2.) proposed changes to the Federal Emergency Management Agency's (FEMA's) Radiological Emergency Preparedness Program Manual.

The Pennsylvania Bureau of Radiation Protection (BRP) has closely studied the document, NEI-0604 Revision 0, Nuclear Energy Institute, Guidelines for Development of EP Drill and Exercise Threat-Based Scenarios. In March 2007, BRP submitted extensive comments on the June 2006 DRAFT of this document. BRP staff have participated in or observed pilot exercises at the Vermont Yankee plant in Vermont (February 2006), the Perry plant in Ohio (June 2007), and the SSES plant in Pennsylvania (Oct.-Nov. 2007).

1. Comments on the status and lessons-learned from the "off-year" security threat-based Emergency Preparedness drills, including scenario development:

a. Pilot Program – Learning Experience: Pilot program exercises need to be viewed as learning experiences for all participants. Scenario development needs to involve the onsite staff and offsite response organizations. Pilot exercises should not be used to satisfy Performance Indicators, as this eliminates offsite response organizations' participation in scenario development, and removes the opportunity to use the same scenario for both the Tabletop and the actual Exercise. BRP observed the Perry pilot program, in which the same scenario was used for both the Tabletop and the actual Exercise. BRP felt that valuable training was accomplished by having exercise participants use the lessons learned from the Tabletop in the actual Exercise.

b. Exercise Timeline: The NEI document calls for a two-phase exercise, with a time jump between phases. BRP finds this practice to be

confusing to exercise participants and recommends that the time jump be eliminated.

c. Radiological Release: The fundamental hazard from a nuclear power plant to offsite areas is a substantial release of radioactive material into the environment. BRP believes that scenarios for security threat-based exercises should allow for the possibility of radiological releases into the environment at levels which call for protective actions to be undertaken for the public. Radiological releases should not be absolutely required, nor should they be absolutely excluded for security threat-based exercises.

d. Development of Standard Guidance for Nuclear Power Plants: BRP believes that standard guidance should be developed for nuclear power plants in areas including:

-- Command and Control (Incident and Unified Command), to include pre-designated locations for command posts.
-- Staging Areas for offsite responders, to include pre-designated locations for these staging areas.
-- Communication discussed, alternate methods of communication identified, and communications tested with offsite responders. For example. Beaver Valley Power Station is testing the use of Pennsylvania's 800 MHz radio system.
-- Credentialing of offsite responders for entrance to plant.
-- Incident Command Training for onsite emergency responder senior staff, recommend similar to ICS-300 level.

e. Input from Offsite Response Organizations: As noted above, in March 2007 BRP submitted extensive comments on NEI 06-04. BRP has had no indication that any of its comments were accepted. As the process of developing guidelines for EP Drill and Exercise Threat-Based Scenarios moves forward, BRP strongly requests that NRC and FEMA involve offsite response organizations in an active and substantial way in the process.

2. Comments on proposed changes to the Federal Emergency Management Agency's (FEMA's) Radiological Emergency Preparedness Program Manual:

a. Stakeholder Involvement: BRP recognizes that the development of exercise methodology for security threat-based exercises is in the early and formative stages. BRP looks forward to working with the whole universe of stakeholders, including the NRC, FEMA, the Nuclear Industry, Law Enforcement, State and Local Government, Tribal representatives, and other offsite response organizations to develop an exercise methodology that prepares onsite emergency responders and offsite response organizations to work together effectively in addressing security threat-based events.

BRP was an active participant in the FEMA led workshops which led to the revisions of FEMA REP-14 and 15, and we look forward to participating in changes to FEMA's Radiological Emergency Preparedness Program Manual with respect to security threat-based exercises. BRP strongly believes that stakeholder participation in development of the needed evaluation criteria is necessary for the successful implementation of the security threat-based exercises. In addition, the criteria need to be developed during the pilot program, not after.

Thank you for your consideration in this matter.