

# Objectives Development for Hostile Action-Based Drill

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# NUREG-0654 and NEI 06-04

- **Standard drill objectives currently demonstrate elements necessary to respond to a radiological emergency**
- **Hostile Action-Based Drill requires development of additional objectives that reflect response to a hostile action**

# Implement Emergency Plan

- **Demonstrate the ability to implement the emergency plan during a security event.**
  - **Timely and correct implementation of the appropriate procedures to make:**
    - **On-site Protective Actions**
    - **Emergency Classification**
    - **Protective Action Recommendations**
    - **Offsite Notifications**
    - **ERO Notification**



# Initial Notifications

- **Demonstrate the ability to make initial notifications to law enforcement and other first responder agencies during a threat based event.**
  - **Notifications as specified by procedure to:**
    - **LLEA**
    - **Fire**
    - **Medical**
    - **Other Response Agencies**



# NRC Notification

- **Demonstrate the ability to make accelerated NRC notifications.**
  - **Perform accelerated notification to the NRC in accordance with appropriate procedures.**
    - **Consideration of maintaining an open line with NRC in subsequent communication with NRC (i.e. safeguards team)**



# On-Shift Operations

- **Demonstrate the ability of on-shift Operations and Security personnel to coordinate response actions among themselves, the Incident Commander (IC) and with law enforcement.**
  - **Discussion, decision-making and communication related to:**
    - **Communicating initial damage assessment and priorities for offsite response activities**
    - **Threat location and progression**
    - **Control, coordination and prioritization of on- and offsite resources for near-term response in accordance with Security Plan (e.g. perimeter control supplement by LLEA)**

# On-Shift Operations (cont.)

- **Discuss decision-making and communication related to:**
  - **Radiation protection for offsite resources**
  - **Changes to protective strategies**
  - **Entry and/or staging points for law enforcement personnel**
  - **Support for rapid deployment of law enforcement personnel**

# Onsite/Offsite First Responders

- **Demonstrate the ability of Operations and Security personnel to coordinate responses by onsite and offsite first responders (e.g. fire and medical response) after the threat is neutralized and prior to activation of ERO facilities.**
  - **Discussion, decision-making and communication related to:**
    - **Control of site access for various responders, ensuring security measures are taken to protect the site from additional intrusion, coordinating with the IC.**
    - **Entry and/or staging points for fire trucks, ambulances, etc.**
    - **Support for rapid deployment of first responder personnel.**

# Mobilization of ERO

- **Demonstrate the ability to mobilize the ERO in a timely manner following threat neutralization.**
  - **Discussion, decision-making and communication related to:**
    - **Confirmation that the threat has been neutralized.**
    - **Status of the plant and potential for core damage/threat to public.**
    - **Fire fighting and medical responses.**
    - **Selection of safe passage routes and/or use of escorts.**

# Mobilization of ERO (cont.)

- **Discussion, decision-making and communication related to:**
  - **Instructions on movement to be provided to responders (e.g., routes, escorts, exclusion areas, proceed directly to facilities, do not detour inspection damage, etc).**
  - **Crime scene preservation**
  - **Protection of emergency response facilities and staff by posting officers**
  - **Coordination for allowing responder vehicles to exit the site for the EOF and Joint Information Center.**

# Activation Of Incident Command Post

- **Demonstrate the ability of the site and ERO to support activation and operation of an Incident Command Post (ICP).**
  - **Following elements should be considered:**
    - **Accessibility by Offsite Responders.**
    - **Dispatch of personnel to the ICP to serve as liaisons to ERO facilities.**
    - **Availability of site and plant layout, and other logistics that the ICP staff might need to effectively manage law enforcement, fire and medical responses.**
    - **Communication with field responders.**



# In-plant and Onsite Response Actions

- **Demonstrate the ability of the ERO to coordinate in-plant and on-site response actions with Security and Incident Command Post.**
  - **Effective interface between the emergency director, onsite liaison(s) and IC, including their roles, responsibilities and authorities as conditions change.**
  - **The ERO must coordinate the movement of on-site and in-plant response personnel with Security and law enforcement decision makers.**
  - **Response personnel must adhere to movement restrictions imposed by security and law enforcement and decision makers, e.g., stay clear of perimeter zones, definition of free movement areas, special identification, two-person line-of-sight rule, use of escorts, etc.**

# Activation of Alternate Facilities

- **Demonstrate the ability of the ERO to activate alternate facilities and to perform effectively from these locations (if required by scenario).**
  - **Determine if activation of alternate facilities is necessary based on the event conditions, and communicate this decision to ERO members.**

# Fire and Medical Response

- **Demonstrate the ability to coordinate and conduct fire and medical response in the field.**
  - **Coordinate deployment of the fire and medical response resources between ICP, onsite ERO facilities (if activated), and Security.**
  - **Responses should be demonstrated to both multiple personnel casualties and a fire in the protected Area potentially or actually affecting safety-related equipment.**



**Emergency**



# Accountability after Threat Neutralized

- **Demonstrate the ability to account for onsite personnel once the threat is neutralized.**
  - **Discuss and/or implement appropriate strategies for conducting accountability and facility movement of onsite personnel (including assembly and release as required) in the post-threat environment.**

# Radiation Protection for Responders

- Demonstrate radiation protection measures for offsite responders.
  - As appropriate to the post-threat environment, discuss and/or implement measures such as dosimetry, KI, respiratory protection, etc.



# Radiological Consequences from Projected Release

- **Demonstrate the ability to perform an assessment of offsite radiological consequences from a projected release.**
  - **Perform an offsite dose projection based on a possible (e.g., what-if) radiological release.**
  - **Determine if the projection results cause or alter Protective Action Recommendations (PARs).**



# Impact on Security Plan

- **Demonstrate the ability to assess the impact of the attack on the Security Plan, and to identify and implement compensatory measures if needed.**
  - **Security management should:**
    - **Assess the effects of attack on the ability to control access (to both the site and Protected Area), maintain defensive positions (officer casualties, damage to protective enclosure, etc.) and operate security related equipment**
    - **Develop compensatory measures to restore physical security; this may include use of law enforcement personnel and resources**
    - **Advise the appropriate ERO personnel of the need to invoke 10 CFR 50.54(x) and (y), and perform subsequent notification to the NRC (H00)**

# Public Information

- **Demonstrate the ability of the ERO to coordinate the development and release of public information with the Incident Command Post.**
  - **Integrate public information officials from law enforcement agencies into Joint Information Center operations. Press releases and statements must be vetted for sensitive and safeguards information prior to issuance.**



# Integration of Required Functional Demonstrations

- **Identify existing objective(s) and demonstration/evaluation criteria in the current Radiological Emergency Plan program that relate to NEI 06-04 Functional Demonstrations**
- **Determine if existing processes/evaluation accomplish the function and evaluate performance of the function**
- **Identify any gaps to successful performance and evaluation of Functional Demonstrations**
- **Revise processes and documents to fill the gaps**

# Example #1 – NEI 06-04

- **FUNCTIONAL DEMONSTRATION 3.**
  - **Demonstrate the ability to make accelerated NRC notifications**
  - **Speaks to NUREG 0654 Planning Standard F, Emergency Communications.**
  - **Performance Attributes - Perform accelerated notification to the NRC in accordance with appropriate procedures. Consideration of maintaining an open line with NRC in subsequent communication with NRC (i.e. safeguards team).**

# Example #1 – SONGS Evaluation

## **CR-3 Red Phone Communications with NRC Operations Center CONTROLLER-SPECIFIC AREAS TO EVALUATE**

- **An operator provides initial notification to the NRC immediately following notification to the offsite agencies (within 20 minutes of declaration).**
- **The first notification provides information consistent with the Drill Summary. The Red Phone Talker calls the NRC within one hour of the declaration of an emergency.**
- **The Red Phone Talker maintains a continuous open line, unless released by the NRC. The Red Phone Talker leaves the phone no more than a few moments to obtain answers to questions.**
- **The Red Phone Talker provides sufficient status of the event such that all significant aspects of the emergency can be understood.**

# Example #1 – SONGS Procedure

## A01 S023-13-25, Operator Actions During Security Events

### OPERATOR ACTIONS

- **TRIP the Reactor, and Implement S023-12-1, Standard Post Trip Actions.**
- **Make an OPS channel radio announcement for Operators in the field to take cover.**
- **DISPATCH two Licensed Operators to the 50' CB L-042, Remote Shutdown Panel. (One SRO is preferred, if possible.)**
- **Call the NRC, via the Red Phone. (LS-1.6)**
- **MANUALLY INITIATE one Train of TGIS...**

# Example #1 – SONGS Procedure (continued)

## AOI S023-13-25, Operator Actions During Security Events OPERATOR ACTIONS DURING SECURITY EVENTS LIMITATIONS AND SPECIFICS (LS)

- **1.6 Call to the NRC for a Security Event should be made promptly (within 15 minutes if possible), and should only provide the following information before terminating the call:**
  - **SONGS (Site Name)**
  - **Emergency Classification (only if determined at time of the call)**
  - **Nature of the threat (described briefly, if known)**
    - **Type Of Attack (armed assault by land, water or aircraft)**
    - **Attack Status (imminent, in progress, etc)**
- **This notification does not replace the 1 hour notification required by the EIPs.**

# Example #1 – SONGS Evaluation Updated Version

## CR-3 Red Phone Communications with NRC Operations Center CONTROLLER-SPECIFIC AREAS TO EVALUATE

- For a Security Event, an operator provides initial notification to the NRC promptly (within 15 minutes), and provides the following before terminating the call:
  - SONGS (Site Name)
  - Emergency Classification (only if determined at time of the call)
  - Nature of the threat:
    - Type Of Attack (armed assault by land, water or aircraft)
    - Attack Status (imminent, in progress, etc)
- An operator provides initial notification to the NRC immediately following notification to the offsite agencies (within 20 minutes of declaration).
- The first notification provides information consistent with the Drill Summary. The Red Phone Talker....

# QUESTIONS?

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