



FEMA

December 14, 2007

Mr. Johnnie L. Smith, Administrator
Wisconsin Emergency Management
Department of Military Affairs
2400 Wright St., PO Box 7865
Madison, Wisconsin 53707-7865

Dear Mr. Smith:

This is to inform you of the U.S. Department of Homeland Security/Federal Emergency Management Agency's identification of a Deficiency finding for the State of Wisconsin under Criterion 2.a.1. – Emergency Worker Exposure Control during the Kewaunee Power Station's Radiological Emergency Preparedness (REP) Full Participation Plume Exposure Pathway Exercise, conducted on December 4, 2007. This issue was presented to the Exercise participants, including State Staff, as well as to the Media during the post-exercise Participants' Meeting on December 7, 2007.

In accordance with 44 CFR 350.9(d) and the DHS/FEMA Interim REP Program Manual, we have thoroughly reviewed and discussed this issue with DHS/FEMA Headquarters, the U.S. Nuclear Regulatory Commission, and DHS/FEMA Region V. The DHS/FEMA Interim REP Program Manual, Exercise Annex B: Exercise Evaluation Methodology, defines a Deficiency as "...an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that offsite emergency preparedness is not adequate to provide reasonable assurance that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant." Because of the potential impact of a Deficiency on the public health and safety, it is expected to be corrected within 120 days after the exercise through appropriate remedial actions, which may include plan revisions, additional training or drills and a remedial exercise.

Although the health and safety of the general public was never compromised, this issue rises to the threshold of being classified as a Deficiency due to an observed lack of implementation of radiation exposure control measures by the Field Team Coordinator (FTC), and Field Team Staff, both of which would have likely contributed to field team members being exposed to unnecessary and exceedingly high doses of radiation. More detailed information regarding Criterion 2.a.1 performance is included in an enclosed narrative write-up.

It is FEMA's determination that the issue described above, combined with an additional six Areas Requiring Corrective Action (ARCA) identified in related criterion between the

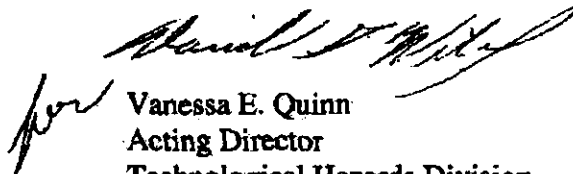
FTC and the Field Teams, warrants a Deficiency finding, and an immediate need for attention to assure that an adequate capability to protect these emergency workers is put into place as soon as possible.

Please coordinate with DHS/FEMA Region V regarding a Schedule of Corrective Actions (SCA), including the date, time and identification of those participating in any remedial exercises. A response to this letter, including a SCA is requested as soon as possible, but no later than December 24, 2007, as stipulated in the Interim REP Program Manual, Page III-251.

A copy of this letter has been forwarded to FEMA Region V, the U.S. Nuclear Regulatory Commission Headquarters, and NRC Region III.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact William E. King, Chairman, Regional Assistance Committee, at (312) 408-5575.

Sincerely,


for Vanessa E. Quinn
Acting Director
Technological Hazards Division

cc: NRC Headquarters
NRC Region III