

From: "Carol O'Claire" <COClaire@dps.state.oh.us>
To: <jda1@nrc.gov>
Date: 01/16/2008 9:26:28 AM
Subject: NEI 06-04, Rev. 1

EMA would like to submit the following comments to NEI 06-04, Nuclear Energy Institute, "Conducting a Hostile Action-Based Emergency Response Drill":

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"Off-site response agencies have or will be adopting the protocols described in the National Incident Management System and the ICS."

ORO's have not received any guidance on how to integrate the NIMS protocols into REP plans.

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"A team of representatives from key on-site stakeholder organizations including EP operations and security should develop the drill scenario. Effective collaboration is also required with off-site stakeholders."

ORO's should be included in the development of the scenario to ensure the scenario meets their needs and provides them the opportunity to effectively exercise their plans and procedures.

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"A time-jump or time compression may be used provided that it does not preclude the demonstration of significant decisions or actions that participants would have made during the jumped/compressed period."

The time-jump used for the Perry security drill caused confusion for state participants. Time-jumps may be necessary; however, ORO's should be encouraged to participate throughout the entire drill.

Appendix C, Pre-Drill Tabletop Guidelines

This diagram caused confusion for drill participants. Charts are needed that correctly represent ICS organizational structure.

Attached is an "example" of a more correct diagram.

Acknowledgements: Correct spelling: acknowledgments This is a very small point--acknowledgement is an accepting spelling but is not the English accepted spelling.

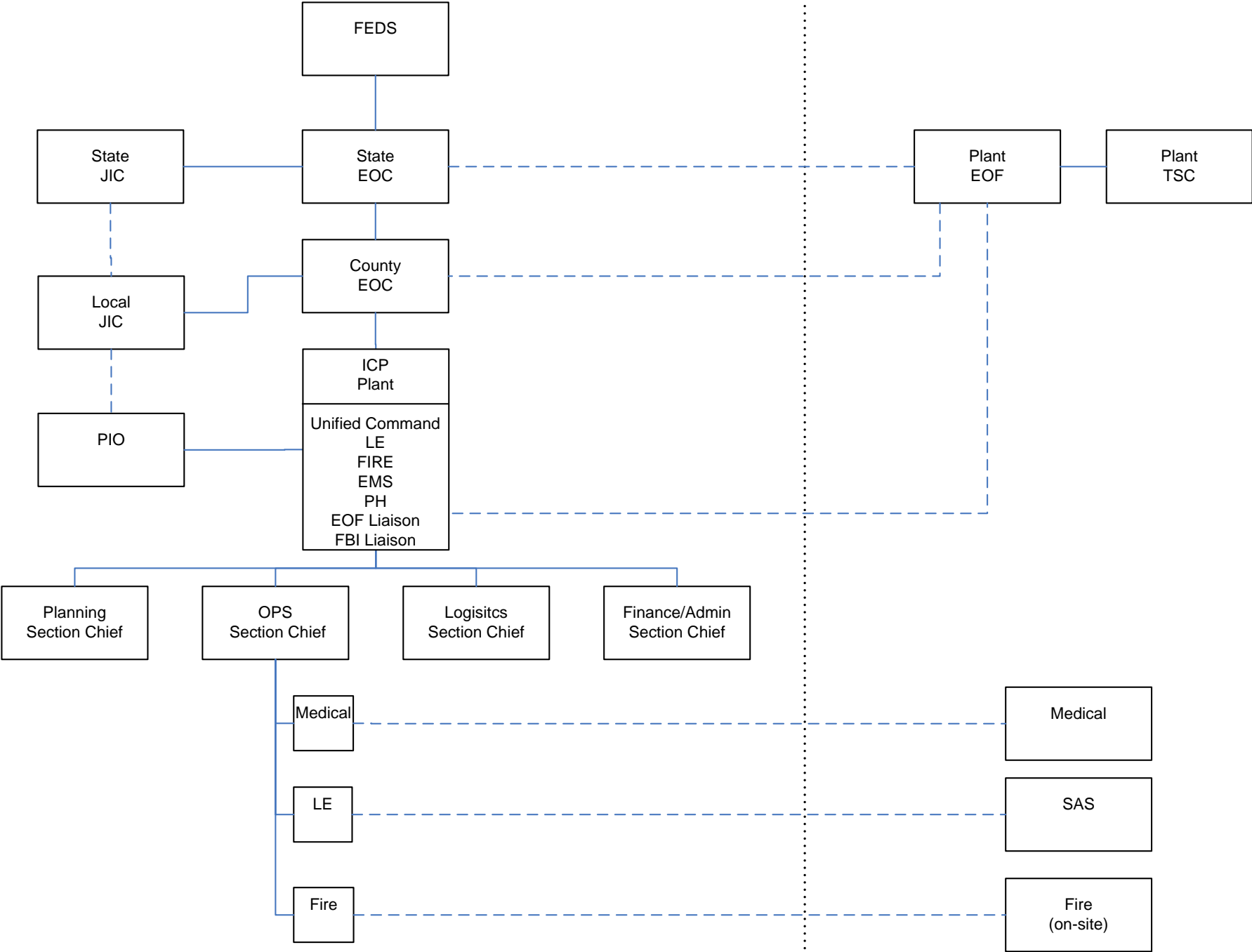
Also, Larry Green: Correct spelling: Larry Greene

Thank-you for the opportunity to comment.

CC: "Melvin R. House" <MRHouse@dps.state.oh.us>

ICS

Plant



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