



FEMA

March 20, 2008

TO: FEMA Regional Administrators
Deputy Regional Administrators
Federal Preparedness Coordinators
Regional Assistance Committee Chairs

SUBJECT: INTENT TO ENGAGE STAKEHOLDERS ON DRAFT PRELIMINARY
CHANGES TO RADIOLOGICAL EMERGENCY PREPAREDNESS
EXERCISE GUIDANCE

Over the past year, the Federal Emergency Management Agency (FEMA), in coordination with the Nuclear Regulatory Commission (NRC), has developed draft preliminary changes to existing guidance for the development of radiological emergency preparedness (REP) exercise scenarios and evaluation of demonstration criteria. The intent of these draft preliminary changes is to help avoid the preconditioning of exercise participants, while addressing challenges to existing REP programs posed by the post-September 11, 2001 threat environment.

A summary of draft preliminary changes to FEMA's REP Program Manual is enclosed, which addresses key enhancement areas (i.e., non-sequential escalation in event classification, varying radiological release conditions, spectrum of scenarios). This summary is not intended to be all inclusive, but rather of sufficient detail to support the initial engagement of State and local stakeholders, the commercial nuclear power industry, and non-governmental organizations to aid in informing the final development of revisions and/or supplements to applicable NRC and FEMA regulations and guidance, including, but not limited to, the joint FEMA/NRC Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in support of Nuclear Power Plants (NUREG-0654/FEMA-REP-1, Rev.1). Final implementation of FEMA's REP Program Manual to include the draft preliminary changes would require modifications, through a supplement, to associated guidance in NUREG-0654/FEMA-REP-1, Rev.1. FEMA, the NRC, and stakeholders will also continue to evaluate areas for the effective use of State and local resources in REP exercises, while ensuring continued reasonable assurance.

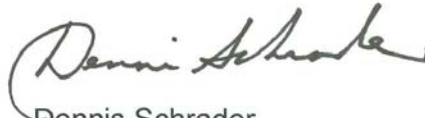
To accomplish these goals, a FEMA/NRC Exercise Task Force will be used, in conjunction with a separate FEMA/NRC Rulemaking Working Group, to facilitate communications with stakeholders and develop the final implementation guidance, including, but not limited to NUREG-0654/FEMA-REP-1, Rev. 1). This Task Force has proposed the following project milestones that offer multiple opportunities for comment and provide for a proactive engagement of stakeholders:

- Provide a summary of draft preliminary changes to REP Program Manual to stakeholders for an initial 90-day comment period.
- Use of multiple regional focus groups and public meetings to provide an opportunity to directly solicit stakeholder comment and discuss related issues and concerns, as well as alternative proposals;
- Use of various organizational groups (National Emergency Management Agency, Nuclear Energy Institute, etc.) to assist in reviewing comments received from their respective constituents and developing proposed changes or recommendations for FEMA/NRC Exercise Task Force consideration.
- FEMA observation of designated hostile action-based emergency preparedness drills in calendar years 2008 and 2009 to aid in validating proposed changes dealing with demonstration of National Incident Management System/Integrated Command Structure (NIMS/ICS) aspects.
- Provide a formal opportunity for public comment and engagement of stakeholders on the proposed changes to the FEMA REP Program Manual through a Federal Register Notice, along with an opportunity for public comment and engagement of stakeholders on proposed changes supplementing NUREG-0654/FEMA-REP-1, Rev. 1. Stakeholders will also have the opportunity to provide input as part of the proposed NRC emergency preparedness (EP) rulemaking addressing a broad spectrum of changes to the NRC's EP regulations, including REP exercises
- The FEMA/NRC Exercise Task Force will continue to involve the FEMA Regional Assistance Committee Chairs and NRC Regional State Liaison Officers to coordinate any activities within their respective regions and to maximize the use of regional FEMA and NRC expertise.

The availability of a summary of preliminary changes to REP Program Manual is intended to inform stakeholders of the current status of the FEMA/NRC Exercise Task Force's activities. The FEMA/NRC Exercise Task Force would not solicit formal public comments requiring responses on the preliminary draft changes to REP Program Manual. The draft preliminary changes may be subject to significant revisions during the final implementation process.

Your assistance is requested in distributing this letter to the appropriate State Emergency Management Directors prior to the April 7-9, 2008 National Radiological Emergency Preparedness Conference. Specific questions on the draft preliminary changes to the REP Program Manual, associated with this initiative, should be directed to Mr. Craig Fiore (Deputy Chief, REP Branch/FEMA Technological Hazards Division/National Protection Directorate) at (703) 605-4218.

Sincerely,

A handwritten signature in dark ink, appearing to read "Dennis Schrader". The signature is fluid and cursive, with a large initial "D".

Dennis Schrader
Deputy Administrator for National
Preparedness
Federal Emergency Management Agency

A handwritten signature in dark ink, appearing to read "Roy Zimmerman". The signature is fluid and cursive, with a large initial "R".

Roy Zimmerman, Director
Office of Nuclear Security and Incident
Response
U.S. Nuclear Regulatory Commission

Enclosure:
As stated

Summary of Draft Preliminary Changes to the Interim Radiological Emergency Preparedness (REP) Program Manual

The following table is intended to aid in engaging stakeholders in dialog, as part of proposed regional focus (discussion) groups, on preliminary changes being considered to the REP Program Manual. Stakeholders are also encouraged to provide comments on this table to Mr. Craig Fiore (Deputy Chief, REP Branch/FEMA Technological Hazards Division/National Protection Directorate) at (703) 605-4218.

<u>Manual Section</u>	<u>Section</u>	<u>Comment</u>
Entire Document		Changed: "National Response Plan (NRP)" to "National Response Framework (NRF)"
Part II.C 14. Planning Standard N	Criterion N.1.a	Deleted: "The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases that would require response by offsite authorities."
Part III.B Table 4: Federal Evaluation Process Matrix	Criterion 1.a.1	Added: Criteria C.1 to NUREG-0654 Criteria Column
Part III.B Table 4: Federal Evaluation Process Matrix	Sub-element 2.b	Changed the title of Sub-element 2.b: " Radiological Assessment & Protective Action Recommendations & Decisions for the Plume Phase of the Emergency Phase "
Part III.B Table 4: Federal Evaluation Process Matrix	Criterion 3.d.2	Changed Criterion 3.d.2 to: "Impediments to evacuation and/or response are identified and resolved"
Part III.B Table 4: Federal Evaluation Process Matrix	Footnotes	Added footnote in reference to 1.b.1: "Facilities will only be specifically evaluated for this criterion if they are new or have substantial changes in structure or mission."
Part III.B Table 4: Federal Evaluation Process Matrix	Footnotes	Added footnote in reference to 5.a.3: "The failure (or partial failure) of the primary alert and notification system must be demonstrated once every six years in conjunction with the required hostile action-based scenario in cases where plans require the deployment of resources to perform backup route alerting, which may also be detailed to respond to a hostile action-based event at the site (LLEA, etc)."

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Part III.B Task 6 Guidance	Exercise Scenario Guidance	Changed to: “The radiological data should be supported by and compatible with plant conditions and the associated potential for releases or simulated releases should support and be compatible with the radiological data . In the absence of a simulated release, the extent-of-play committee should develop controller inject data should be developed to drive activities that require simulated exposure rates or concentrations in the environment.”
Part III.B Task 6 Use of Decision criteria	1. Plume pathway exercise play	Added new sentence: “However, radiological release conditions should be varied between biennial exercise scenarios within the 6-year cycle (refer to plume pathway scenario options “d & e” below).”
Part III.B Task 6 Use of decision Criteria	1. Plume pathway exercise play	Added text to sentence: “(2) Scenarios should be designed to sustain potential projected doses for a sufficient period of time to drive OROs to implement protective actions, as applicable (refer to additional options “d & e” below). ”
Part III.B Task 6 Use of Decision Criteria	1. Plume pathway exercise play	Added text to sentence: “(3) The scenario should contain simulated contamination or exposure rates in the form of controller injects to drive field exercise play components requiring them or allow for the evaluation during an out of sequence drill. ”
Part III.B Task 6 Use of Decision Criteria	Heading c: Exercises may begin at any of the four ECLs...	Added new paragraph: “At least one biennial exercise per cycle should involve at a minimum an initial classification at a Site Area Emergency or rapid escalation from an Alert to a Site Area Emergency.”
Part III.B Task 6 Use of Decision Criteria	Heading c: Exercises may begin at any of the four ECLs...	Added new paragraph: “Organizations may design events triggering an offsite response to initiate exercise play at any ECL and/or provide for the skipping of an ECL(s). In many exercises, the scenario generally postulates a sequential escalation from an Unusual Event or Alert classification through a Site Area Emergency to a General Emergency classification, with appropriate time periods designated between classifications to allow for the systematic demonstration of response activities. This scenario does not reflect actual event classifications where licensees have initially classified at the Alert level or higher. Skipping ECLs can make for less predictability and as a result more realistic and challenging scenarios.”

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Part Iii.B Task 6 Use Of Decision Criteria	Heading c: Exercises may begin at any of the four ECLs...	Changed paragraph to: “Events triggering an offsite response may be designed to initiate exercise play at any ECL and/or provide for the skipping of an ECL(s). Skipping ECLs can make for more interesting and less predictable scenarios.” To drive the offsite response, an event generally must reach the General Emergency classification. If the event does not result in a simulated release of radioactivity, the extent-of-play committee must provide controller injects must be provided to allow evaluation of field monitoring/ dose projection and protective action decision-making/implementation activities.”
Part III.B Task 6 Use of Decision Criteria	Heading c: Exercises may begin at any of the four ECLs...	Changed to: “It is recommended that FEMA recommends that organizations scenarios for exercises and drills be varied to enhance training and provide for a more realistic response.”
Part III.B Task 6 Use of Decision Criteria	Heading c: Exercises may begin at any of the four ECLs..	Added new sentence: “In addition, the advantages gained by not declaring the four ECLs in sequential order can be lost if the “dress rehearsal” drill that is held at many sites employs the same use of ECLs out of their usual order. The scenario for the “dress rehearsal” should <i>not</i> be the same scenario that is used during the evaluated exercise.”
Part III.B Task 6 Use of Decision Criteria	Heading d: The plume and post- plume phases may be separated by days or months. . .	Added new section: <i>“d. Radiological release options should be varied</i> (1) <u>“No release.</u> One biennial exercise per cycle will not be required to simulate a radiological release to the environment. However, the scenario must postulate conditions that would warrant a protective action decision. This will require the escalation to a General Emergency classification (based on plant conditions) to drive a protective action decision, based on the licensee and state/local emergency plans, and reflect the potential for an imminent release if appropriate imitative actions are not taken. The scope of demonstration will include the capability to mobilize and control field teams and perform and coordinate dose assessments.

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		<p>To allow for the evaluation of dose assessment and field monitoring activities for a postulated radiological release, either controller injects may be provided or biennial exercise will be supplemented by formal evaluation of the annual radiological monitoring drill and health physics drill by FEMA-REP Program.</p> <p>Due to the impact on state and local resources, prior agreement of the use of the “no release” option must be reached between the licensee and respective offsite response organizations as part of the overall scenario development process.</p> <p>(2) One biennial exercise per cycle will simulate <u>dose levels to exceed EPA-400 Protective Action Guides (PAGs) beyond the site boundary</u>, with the potential for dose levels to exceed EPA- 400 PAGs beyond two miles if prompt mitigative actions are not implemented.</p> <p>(3) One biennial exercise per cycle will simulate <u>dose levels to exceed EPA-400 PAGs beyond five miles</u>, with the ability to determine and implement protective actions out to 10 miles based on release. This release option is required for all ingestion pathway exercise scenarios.”</p>
Part III.B Task 6 Use of Decision Criteria	Heading d: The plume and post-plume phases may be separated by days or months...	<p>Added new section:</p> <p><i>“e. Radiological release conditions should vary</i></p> <p>Release and meteorological conditions will vary between exercise scenarios within a cycle (i.e., puffs vs. continuous release, ground vs. elevated release, shifting wind direction and speed) to reflect plant design and historical site characteristics for a specific season. Controller injects may be needed to drive consideration of field monitoring and consideration of protective actions in other than prevailing downwind areas.”</p>

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<p>Part III.B Task 6 Use of Decision Criteria</p>	<p>Heading d: The plume and post- plume phases may be separated by days or months...</p>	<p>Added new section:</p> <p><i>"f. The spectrum of scenarios will be varied to create more realistic and challenging exercises</i></p> <ol style="list-style-type: none"> (1) One biennial exercise per cycle must be driven by a <u>hostile action-based scenario</u> that focuses on unique response challenges posed to licensee and offsite response organizations (OROs). <ul style="list-style-type: none"> • Scenarios will differ from cycle to cycle to reflect various attack scenarios considered applicable to the site (i.e., ground, waterborne, airborne, or a combination). • Scenarios may include simultaneous attacks or threats to other facilities at the regional or local level that would impact ORO resource availability in responding to an event at the nuclear power plant (NPP) site. • Scenarios may include equipment/component failures (i.e., failure of an emergency diesel generator or ECCS pump to start, failure of containment to isolate) to facilitate escalation in event classification or radiological release potential. • Scenarios must not provide for a "no release option" for consecutive hostile action-based exercises. (2) Natural phenomenon/all-hazard events should be considered as possible scenario initiating events, based on applicability to site: <ul style="list-style-type: none"> • Natural events historically applicable to the regional area (hurricane, tornado, earthquake, flooding, etc.) • Site-specific all-hazards events (accident involving near-site facility, train derailment on or adjacent to site owner controlled area, etc.) These events should not be limited to the impact on NPP structures/ components but also consider the impact on ORO resources and command & control. However, event(s) should not be of sufficient magnitude to focus attention away from evaluating the response to the overall NPP emergency.
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		(3) Impact of seasonal conditions – guidance currently states that “exercises should be conducted under various seasons and weather conditions.” However, implementation has been impractical. As such, the focus should be on seasonal factors impacting the protective action recommendation/pad process, schools in/out of session, etc.”
Part III.B Task 6 Use of Decision Criteria	Heading d: The plume and post-plume phases may be separated by days or months...	Renumbered from d. to g: “ <i>The plume and post-plume phases may be separated by days or months</i> ”
Part III.B Task 6 Use of Decision Criteria	Heading d: The plume and post-plume phases may be separated by days or months...	Changed to: “ Organizations may separate plume and post-plume activities may be separated. ”
Part III.B Task 6 Use of Decision Criteria	Heading e: State, tribal, and local governments may provide a representative...	Renumbered from e to h: “ <i>State, tribal, and local governments...</i> ”
Part III.C Evaluation Area Sub-element 1.a	Sub-Heading: “Intent”	Reference added to NUREG-0654 Criterion: “C.1”
Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading: “Extent-of-Play”	Added new sentence: “As appropriate, the ability of local responders to promptly notify the respective emergency management organizations of an event should be demonstrated when the information is passed immediately from station security.”
Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading “Extent-of-Play”	Added text to sentence: “Activation of facilities, including the incident command structure , should be completed in accordance with the plan and/or procedures.”

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Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading: “Extent-of-Play”	Added new paragraph: “The incident command structure and staging areas should be positioned far enough from the nuclear power plant site to preclude placing first responders at risk due to any on-going threat. In addition, other factors, such as meteorological conditions, should be considered when initially positioning or repositioning the incident command structure and/or staging areas to minimize first responder exposure if the potential for an offsite radiological release at the nuclear power plant exists.”
Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading: “Extent-of-Play”	Created a new paragraph starting with: “Pre-positioning of emergency personnel is appropriate, in accordance with the extent-of-play agreement, at those facilities located beyond a normal commuting distance from the individual’s duty location or residence...”
Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading: “Extent-of-Play”	Added new sentences: “Pre-positioning of emergency personnel is appropriate, in accordance with the extent-of-play agreement, at those facilities located beyond a normal commuting distance from the individual’s duty location or residence. Further, pre-positioning of staff for out-of-sequence demonstrations is appropriate in accordance with the extent-of-play agreement. <i>Pre-positioning must be negotiated during the extent-of-play meetings, including appropriate contingencies prior to arrival of exercise players.</i> Consider delaying the arrival of players by ten minutes for every hour of travel time.”
Part III.C Evaluation Area Criterion 1.a.1	Sub-Heading: “Extent-of-Play”	Added new paragraph: “Initial law enforcement, fire service, and emergency medical service response to the nuclear power plant site may impact the ability to staff REP functions. The ability to identify and request additional resources or identify compensatory measures should be demonstrated. Exercises should also address the role of mutual aid and the Emergency Management Assistance Center (EMAC) to the incident. An integral part of the response to a hostile action-based scenario at a nuclear power plant may also be within the auspices of the Federal government (i.e., FBI, NRC, DHS). Protocols for requesting Federal, State and local law enforcement support should be demonstrated, as appropriate.”

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Part III.C Evaluation Area Criterion 1.c.1	Sub-Heading: "Extent-of-Play"	Added new paragraph: "As appropriate, essential functions of the response effort needed to effectively demonstrate the incident command structure will be evaluated. The effective coordination of incident command with the nuclear power plant and state/local EOCs in support of event assessment and mitigative efforts would be the primary focus of this extent-of-play. Responding agency/ jurisdiction representatives should be integrated into the incident command structure as needed. Personnel accountability is established and maintained at the incident command structure, and appropriate security measures are implemented and maintained according to the threat. Incident command structure (NIMS) principles shall apply."
Part III.C Evaluation Area Sub-element 1.d	Sub-Heading: "Intent"	Added text to sentence: "This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should establish reliable primary and backup communication systems to ensure communications with key emergency personnel at locations such as the following: appropriate contiguous governments within the emergency planning zone (EPZ), federal emergency response organizations, the licensee and its facilities, emergency operations centers (EOCs), <i>forward command centers/posts (including incident command structures)</i> , and field teams."
Part III.C Evaluation Area Criterion 1.d.1	Sub-Heading: "Extent-of-Play"	Added new paragraph: "As appropriate, capabilities to provide for effective primary and backup communications between the incident command structure and the nuclear power plant, first responders dispatched from staging areas or responding to the nuclear power plant site, and with EOCs should be demonstrated."
Part III.C Evaluation Area Criterion 1.e.1	Sub-Heading "Extent-of-Play"	Deleted part of sentence: "Responsible OROs should demonstrate the capability to maintain inventories of KI sufficient for use by emergency workers, as indicated on rosters. "

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Part III.C Evaluation Area Criterion 1.e.1	Sub-Heading: "Extent-of-Play"	Added new paragraph: "As appropriate, provisions to make dosimetry and KI available to specialized response teams (i.e., civil support team, swat, urban search and rescue, bomb squads, or other ancillary groups not currently identified within the plans and procedure(s)) should be demonstrated. In addition, equipment compatibility associated with law enforcement, fire service, and emergency medical services response from the incident command structure or staging areas should be demonstrated."
Part III.C Evaluation Area Criterion 1.e.1	Sub-Heading: "Extent-of-Play"	Deleted part of sentence: "Dosimetry: Sufficient quantities of appropriate direct-reading and permanent record dosimetry and dosimeter chargers should be available for issuance to all emergency workers either assigned to (if the facility is within the plume EPZ) or deployed from the facility. "
Part III.C Evaluation Area Criterion 2.a.1	Sub-Heading: "Extent-of-Play"	Added new 2 nd sentence: "Responsible OROs should demonstrate the capability to make decisions concerning the authorization of exposure levels in excess of preauthorized levels and to the number of emergency workers receiving radiation dose above pre-authorized levels. <i>This would include emergency workers dispatched on-site to support plant accident assessment and mitigative actions.</i> "
Part III.C Evaluation Area Sub-element 2.b	Heading	"Radiological Dose Assessment & Protective Action Recommendations & Decisions for the Plume Phase of the Emergency Phase"
Part III.C Evaluation Area Sub-element 2.b	Sub-Heading: "Intent"	Added text to sentence: "ORO's base these choices on PAGs from the ORO's plans and/or procedures or the Environmental Protection Agency (EPA) guidance manual, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents, EPA-400-R-92-001 (May 1992), and other criteria, such as, plant conditions, licensee protective action recommendations, coordination of protective action decisions with other political jurisdictions (e.g., other affected OROs), availability of appropriate in-place shelter, weather conditions, and situations <i>(to include hostile action-based events, the effects of the specific hostile action, and the affiliated response)</i> that create higher than normal risk from evacuation."

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Part III.C Evaluation Area Criterion 2.b.2	Sub-Heading: “Extent-of-Play”	Added text to sentence: “They should demonstrate the capability to make initial PADs in a timely manner appropriate to the situation, based on notification from the licensee, assessment of plant status and releases, available information related to the event, input from appropriate State and local authorities (i.e., the incident command structure) , and PARs from the utility and ORO staff. In addition, a hostile action-based event or other incident may pose an undue risk to an evacuation and an alternate protective action decision may be required. ”
Part III.C Evaluation Area Criterion 2.b.2	Sub-Heading: “Extent-of-play”	Added new paragraph: “Resources designated to support an immediate evacuation of the public may need to be augmented due to ORO law enforcement, fire service and emergency medical services response to the nuclear power plant site or other key infrastructure.”
Part III.C Evaluation Area Criterion 2.b.2	Sub-Heading: “Extent-of-Play”	Added new 2 nd sentence: “The dose assessment personnel may provide additional PARs based on the subsequent dose projections, field monitoring data, or information on plant conditions. In addition, incident command structure may provide input regarding considerations for subsequent PARs based on the response and/or site conditions. ”
Part III.C Evaluation Area Criterion 2.b.2	Sub-Heading: “Extent-of-Play”	Edited sentence: “The decision-makers should demonstrate the capability to change protective actions as appropriate based on these factors projections. ”
Part III.C Evaluation Area Criterion 2.b.2	Sub-Heading: “Extent-of-Play”	Added new 2 nd sentence: “If more than one ORO is involved in decision-making, OROs should communicate and coordinate PADs with other affected OROs. In addition, decisions should be coordinated with the incident command structure. ”
Part III.C Evaluation Area Criterion 2.c.1	Sub-Heading: “Extent-of-Play”	Added new 3 rd sentence: “Usually, it is appropriate to implement evacuation in areas where doses are projected to exceed the lower end of the range of PAGs, except for situations where there is a high-risk environmental condition or where high-risk groups (e.g., the immobile or infirm) are involved. In these cases, examples of factors that should be considered are: weather conditions, shelter availability, availability of transportation assets, risk of evacuation vs. risk from the avoided dose, and precautionary school evacuations. In addition, decisions should be coordinated with the incident command structure. ”

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Part III.C Evaluation Area Criterion 3.a.1	Sub-Heading: “Extent-of-Play”	Added new paragraph: “OROs may have administrative limits considerably lower than EPA-400-R-92-001 dose limits for emergency workers performing various services (i.e., life saving, protection of valuable property, all activities). OROs should ensure that their process used to seek authorization for exceeding dose limits does not negatively impact the capability to respond to an event where life saving and/or protection of valuable property may require an urgent response.”
Part III.C Evaluation Area Criterion 3.d.1	Sub-Heading: “Extent-of-Play”	Added text to sentence: “OROs should demonstrate the capability to select, establish, and staff appropriate traffic and access control points, <i>which may include controlling access to areas affected by the events,</i> consistent with the PADs (for example, evacuating, sheltering, and relocation), in a timely manner.”
Part III.C Evaluation Area Criterion 3.d.1	Sub-Heading: “Extent-of-Play”	Added text to sentence: “Traffic and access control staff should demonstrate accurate knowledge of their roles and responsibilities, <i>including verifying emergency worker credentials as per the extent-of-play agreement.</i> ”
Part III.C Evaluation Area Criterion 3.d.2	Title	Added text to Criterion 3.d.2 Title: “Impediments to evacuation <i>and/or response</i> are identified and resolved.”
Part III.C Evaluation Area Criterion 3.d.2	Sub-Heading: “Extent-of-Play”	Added text to sentence: “OROs should demonstrate the capability, as required by the scenario, to identify and take appropriate actions concerning impediments to evacuation <i>and/or response.</i> ”
Part III.C Evaluation Area Criterion 4.a.1	Sub-Heading: “Extent-of-Play”	Added sentences to the end of paragraph: “Responsible OROs should demonstrate the capability to brief teams on predicted plume location and direction, travel speed, and exposure control procedures before deployment. <i>During a hostile action-based event, the deployment of field teams should be coordinated with the incident command structure. In addition, field teams may be staged during the initial phase of a hostile action-based event until conditions surrounding the nuclear power plant site are understood.</i> ”
Part III.C Evaluation Area Criterion 5.a.3	Sub-Heading: “Extent-of-Play”	Added new sentence: “Backup route alerting should also be demonstrated in conjunction with hostile action-based event scenarios where resource restrictions in responding to the event at the nuclear power plant site may impact the ability to perform backup route alerting.”

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Part III.C Evaluation Area Criterion 5.b.1	Sub-Heading: "Extent-of-Play"	Added new paragraph: "The dissemination of information dealing with specific aspects of nuclear power plant security capabilities, actual or perceived adversarial (terrorist) force or threat, and tactical law enforcement response may be withheld. Pre-approved generic press statements may be utilized in order to initially address media inquiries, while not identifying specifics regarding the response and/or aspects of the crime scene investigation, as agreed upon by the extent-of-play agreement."
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