Changes and Enhancements in REP Exercise Scenarios

"FEMA Perspective: Proposed Changes to EP Exercise Criteria"

National Radiological Emergency Preparedness (NREP) Conference

April 7, 2008

Craig Fiore

Deputy Chief, Radiological Emergency Preparedness Branch

FEMA

Joint FEMA/NRC Letter to Stakeholders

- Summary of proposed changes to REP Program Manual
  - Outlined key enhancement areas
  - NOT intended to be all inclusive
    - Sufficient detail to support the initial engagement of stakeholders
- Outlined process (project plan) for engagement of stakeholders
- Presentation Goal:
  - Provide an overview of proposed changes (key enhancement areas)
  - Discuss proposed outreach efforts and opportunities for stakeholder comment

FEMA

Proposed Changes:

1. Event Classification/Non-Sequential Escalation

- For example: At least one biennial exercise per cycle should involve, at a minimum, initial classification at a Site Area Emergency (SAE), or rapid escalation from an Alert to a SAE
- Escalation to a General Emergency required for every biennial exercise to drive offsite protective action decision-making and associated offsite response activities

FEMA

Proposed Changes:

2. Radiological Releases

- Varying release options (magnitude)
  - At least one exercise per cycle will simulate dose levels to exceed protective action guides (PAGs) beyond 5 miles
    - Ability to determine/implement protective actions out to 10 miles
  - At least one exercise per cycle will simulate dose levels to exceed PAGs beyond site boundary
    - Potential for dose levels to exceed PAGs beyond 2 miles if prompt actions not implemented
  - One exercise per cycle will NOT be required to simulate a radiological release to the environment
    - Prior agreement between licensee and OROs
    - Potential for imminent release if mitigative actions not taken
    - Demonstration of field monitoring and dose assessment for a simulated release (via controller injects or separate evaluated drill)

Proposed Changes:

2. Radiological Releases *(Cont'd)*

- Varying release conditions
  - Meteorological (reflect actual site conditions)
  - Release duration (puff vs. continuous)
  - Release type (elevated vs. ground)

FEMA

Proposed Changes:

3. Spectrum of Scenarios

- One exercise per cycle must be driven by a **hostile action-based scenario** that focuses on unique response challenges
  - "No release option" cannot be used for consecutive hostile action-based scenarios
  - Include evaluation of NIMS/ICS (integrated response) activities
- **Natural phenomenon/all-hazards events** should be considered as possible initiating events
  - As applicable to NPP site
- Impact of **seasonal conditions**

FEMA

Project Plan Provisions

- Proactive engagement of stakeholders
  - (Target: April 1, 2008) Distribution of summary of proposed changes to REP Program Manual to stakeholders (90-day comment period)
  - (mid-April 2008 → July 2008) Conduct regional "focus group" forums on summary of proposed changes to REP Program Manual
  - Utilize stakeholder groups, such as the NEMA, CRCPD, States Homeland Security Advisors, and others to assist with:
    - Focus group forum facilitation;
    - Review of comments received; and
    - Recommend further changes to address significant comments from respective groups

FEMA

Project Plan Provisions

- Multiple opportunities for stakeholder comment
  - (1st Qtr CY 2009) Issue for comment: Draft revision of REP Program Manual and associated draft supplement to NUREG-0654/ FEMA-REP-1
  - Continued outreach/updates at periodic conferences and forums
- Participation and observation in on-going hostile action based (Phase 3) EP drills
  - Pilot use of proposed guidance changes by Exercise Task Force
  - Observation opportunities for FEMA Regional Administrators, RAC Chairs, new Federal Preparedness Coordinators, and Protective Security Advisors
- Training on proposed guidance changes prior to implementation

FEMA