Introduction

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The following pages summarize feedback on the Task Force proposed changes to the Radiological Emergency Preparedness (REP) Program Manual (RPM) received from local, State, Federal, utility, and special interest group stakeholders that participated in the 20 Focus Groups conducted from May-August 2008. Focus Groups were convened in each Federal Emergency Management Agency (FEMA) Region (with the exception of Region VIII, as it has no operating nuclear reactors).

The Task Force assigned comments received to one of the following categories:

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The following pages contain summaries of the comments received for each of these categories. These are intended to provide Department of Homeland Security (DHS)/FEMA leaders with a snapshot of the types of issues that have been raised and how the Task Force has addressed them.

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Category Rapid Escalation of ECLs and the GE Requirement

Description Rapidly escalating scenario

Number Comments Received on this Category of Scenario Changes: 303 (33%)

- Clarify whether it is required or optional that one exercise scenario per cycle should start at a Site Area Emergency (SAE) or rapidly escalate from Alert to an SAE.
- Define "rapid escalation"
- Rapid escalation of emergency classification levels (ECLs) decreases predictability and preconditioning in emergency response organizations.
- Some tasks may not be practiced/demonstrated when the scenario skips or quickly escalates through ECLs; this may require the use of more out-of-sequence (OOS) activities.
- Some tasks such as notification and mobilization may occur at locations other than an emergency operations center (EOC) when ECLs rapidly escalate; evaluators may need to use more interviews to obtain data on actions they did not observe.
- Existing RPM language already allows for rapid escalation of ECLs; requiring that rapid escalation be incorporated into the exercise cycle may cause greater exercise predictability.
- Predictability of scenarios is characterized by always reaching a General Emergency (GE), not the speed at which an event escalates ECLs.
- Rapid escalation may decrease opportunities for locals, States, and utilities to practice coordination at each of the ECLs.
- The proposed changes would require OROs to develop and submit additional standard operating procedures (SOPs).
- "Rapid escalation of ECLs" scenarios may result in an increase in pre-positioned personnel or require demonstration of how quickly responders can get into position.
- Requiring a sustained response at any ECL would provide additional realism and challenges for the OROs.
- In some States there are legislatively required actions associated with ECLs; in these cases, skipping ECLs may further reduce opportunities to practice decision making.

Category Rapid Escalation of ECLs and the GE Requirement

Description The Task Force proposed language that would allow scenario developers more flexibility in exercise design by allowing scenarios to not reach a GE.

Number Comments Received on this Category of Scenario Changes: 138 (15%)

- Clarify the phrase "must generally reach a GE."
- Benefits of not requiring scenarios to reach a GE:
 - Remaining at an SAE and not escalating to a GE is very realistic.
 - Counters preconditioning and negative training by removing the current expectation that all real world events will reach a GE.
 - Forces participants to respond to the scenario, rather than fulfill a predetermined sequence on a checklist.
 - Reassures the public that not every incident at a nuclear power plant will escalate to a GE.
- Drawbacks of not reaching a GE:
 - If a scenario does not reach a GE, some key elements of REP plans (e.g., decision making, evacuation, dose assessment, public information) might not be demonstrated without additional injects, out-of-sequence drills, and/or interviews.
 - Turnover in OROs is high; if the scenario does not progress to a GE, participants will not have the opportunity to practice the full range of their roles and responsibilities at each of the ECLs.
 - Participants who are responsible for tasks that mostly occur at a GE may be reluctant to participate in future exercises if the scenario does not escalate to a GE.

Category <u>Requiring varying release options and allowing a no-release scenario</u>

- **Description** The Task Force proposed language requiring Regions to vary radiological releases, with the intent of reducing scenario predictability. An option was also provided to exercise a no-release scenario, in which licensees and OROs would not be required to simulate a radiological release to the environment, although the scenario would include the potential for a release, which would necessitate consideration of a protective action decision (PAD).
- Number Comments Received on this Category of Scenario Changes: 204 (22%)

- Stakeholders expressed concern that scenario predictability may remain constant or perhaps even increase with three scenario variations required in a six-year exercise cycle:
 - o The "once per cycle" requirement for a no-release scenario
 - The 2-5 mile radiological release requirement
 - The 5-10 mile radiological release requirement
- A requirement to vary releases may force the NRC and FEMA to extend the exercise cycle beyond six years. If the cycle is extended, gaps in training may occur as a result of "normal" levels of staff (player) turnover.
- Stakeholders expressed concern that, in order to achieve a release that exceeds Environmental Protection Agency (EPA)-400 Protective Action Guidelines (PAGs) between five and ten miles of the site, the scenario will have to assume an unrealistic catastrophic failure of the nuclear power plant.
- Verification of a no-release is equally as important as verifying an actual release.
- Generally speaking, stakeholders advocated for more flexibility in developing scenarios; they perceive the proposed scenario requirements to be even more prescriptive than the current requirements.
- Stakeholders disagree as to whether or not Field Monitoring Teams would actually perform their prescribed functions and evaluation criteria under a no-release scenario.

Category Allowing varying release and meteorological conditions

- **Description** The Task Force proposed language that would require Regions to vary release and meteorological conditions between exercises to decrease scenario predictability and add realism.
- Number Comments Received on this Category of Scenario Changes: 76 (8%)

- Clarify whether each of the named release and meteorological conditions are required or optional within the exercise cycle.
- Not all release or meteorological conditions are realistic at each site.
- Varying release conditions (e.g., puff vs. continuous) would test field monitoring teams' ability to verify a release or confirm the absence of a release.
- Use of real-time weather data would create more realistic and less predicable exercises; however, using only predominant wind conditions as a baseline to run exercises could leave some jurisdictions unprepared and un-exercised.
- Use of real-time weather data is not feasible. Scenarios must be developed and vetted months in advance of the exercise.

Category Incorporating all-hazards into REP exercises

Description The Task Force proposed incorporating local hazards, natural events, and seasonal conditions into REP exercises to increase scenario realism and be consistent with other national preparedness initiatives (e.g., the National Incident Management System (NIMS), the National Response Framework (NRF), and the Homeland Security Exercise and Evaluation Program (HSEEP)).

Number Comments Received on this Category of Scenario Changes: 99 (11%)

- Clarify whether use of /all-hazard events as initiating events is optional or a requirement.
- Incorporating seasonal conditions into the scenario, provided that they did not detract from the demonstration of REP functions, adds realism to the exercises.
- All-hazard events variations would strengthen on-site and off-site capabilities; many sites already incorporate some natural phenomenon into exercise scenarios.
- Natural phenomenon/all-hazard events should not overshadow traditional REP functions.
- ORO's top priority in a natural disaster (e.g., tornados, earthquake) would be protection of the public from the disaster rather than solely on the Nuclear Power Plan.
- Evaluating ORO REP capabilities during all hazards scenarios is unfair; mutual aid resources to implement REP functions may not be available under these circumstances.
- Clarify the policy on allowing OROs to incorporate additional exercise mandates into the REP Program.
- OROs should participate in scenario design to ensure all-hazards elements are realistic and consequences are appropriately projected to ensure all exercise criteria are met.

Category <u>Requirements for hostile action-based (HAB) scenarios</u>

Description The Task Force has incorporated a HAB scenario into the REP exercise cycle to update the REP Program exercise scenarios to incorporate threats that may be encountered in the post 9/11 world. The Task Force acknowledges HAB scenarios will introduce additional elements into traditional REP exercises and has proposed changes accordingly in the Evaluation Criteria.

Number Comments Received on this Category of Scenario Changes: 168 (19%)

- Clarify if a HAB scenario is required once every six years per site or per State.
- Clarify the difference between HAB exercises, force-on-force drills, and take back scenarios.
- Participants will be able to predict that an exercise will use a HAB scenario based on:
 - The significant increase of law enforcement participants for a HAB exercise.
 - The other scenarios that have already been done within the cycle
- During a HAB event, the nuclear power plant is likely to coordinate directly with local law enforcement; traditional REP response organizations may not get notified until after the event is resolved.
 - Plant lock-down during a HAB event may prevent the utility from sharing information with the OROs in a timely manner.
 - HAB scenarios may not provide enough opportunity for all emergency planning zone (EPZ) OROs to demonstrate required criteria.
 - HAB scenarios would most likely involve just the immediate surrounding jurisdictions; some EPZ or host counties may not get exercised.
- During HAB events, incident command should be included in PAD making; traditional REP protective actions (e.g., precautionary transfer of students) may not be appropriate, based on threat conditions.
- Onsite responders may not be familiar with how to coordinate and/or integrate with offsite incident command.
- Players will need training on responding to HAB scenarios before HAB scenarios are evaluated.
 - Additional (mutual aid, State, Federal) responders may not have radiological training.
 - Onsite and offsite coordination needs to be practiced before it is evaluated.
- Guidelines for releasing information to the public during HAB events need to be developed.
 - o Incident command needs to be included in the information release process.
 - Minimum standards must be established for information to be released during HAB events.
- Additional participants (e.g., FBI, DHS) are needed to make HAB exercises realistic; these entities have not been very active in traditional REP exercises.
 - Plans and procedures for integrating these additional resources into HAB REP exercises have not been developed.
 - It is not realistic for Federal responders to arrive on-scene until 12-36 hours into an event; does the HAB scenario requirement imply longer exercises?
 - The inclusion of additional participants will increase the costs associated with conducting exercises.

Category Implementation of Task Force Changes

Description The Task Force examined the use of injects in REP exercises based upon HAB and/or no-release scenarios. Particular attention was paid to identifying needs to drive exercise play for traditional REP functions during HAB and/or no-release scenarios. The Task Force also solicited and facilitated comments on the types of guidance, planning, and training that will be needed to effectively implement the proposed changes to the RPM.

Number Comments Received on this Category of Scenario Changes: 63 (7%)

- The incorporation of NIMS and HSEEP concepts into REP is generally accepted as a near-term reality by the stakeholder community. Stakeholders feel that the integration of these concepts/programs is appropriate and will benefit the existing REP program and REP exercises.
- An increased use of injects during HAB or no-release scenarios may create significant confusion among players.
- Out-of-sequence activities may be required to demonstrate and evaluate some traditional REP requirements.
- Introducing an increased number of injects for a HAB scenario will necessitate the incorporation of additional simulation and control capability.
- The introduction of HAB or no-release scenarios will require an increased presence of law enforcement at all levels as participants in REP exercises. This will require careful planning, training, and integration.
- The necessary skill sets and competencies for REP Evaluators are becoming more diverse. The REP evaluator community will have to adapt and diversify as well to ensure that these are appropriately addressed.
- Stakeholders generally support the adoption of HAB and no-release scenarios into REP. However, they also advocate for time to reasonably incorporate the necessary elements of these scenario realities into all facets of their programs, primarily in planning and training, prior to any required demonstration or evaluation.
- Security requirements may preclude emergency responders, other than law enforcement and other security-related disciplines, from responding under a HAB scenario, until the site and surrounding area is determined to be secure.
- Planning guidance and NRC Emergency Planning (EP) rulemaking efforts must be coordinated with Task Force changes to the REP Program Manual.

Category <u>1.a - Mobilization</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should have the capability to alert, notify, and mobilize emergency personnel and to activate and staff emergency facilities.

Description The Task Force proposed changes to the REP Evaluation Areas were necessitated by the incorporation of HAB scenarios. The focus of these changes is concentrated on three areas: 1) facilities unique to a HAB scenario; 2) traditional REP functions that might be short-staffed during a HAB scenario; and 3) whether OROs have plans or procedures in place to identify and request additional resources to backfill any potentially short-staffed REP functions during a HAB scenario.

Number Comments Received on this Category of Evaluation Criteria: 121 (21%)

- The impact and subsequent evaluation of an expanded and more complex incident command post (ICP) during HAB scenarios merits thorough analysis and consideration.
- The ICP would not necessarily be located at an EOC.
- Notification of HAB events may come from someplace other than the nuclear power plant.
- REP evaluators will need additional training to recognize and understand the full scope of incident command in terms of its integration into REP.
- Stakeholders identified a number of new facilities that may require evaluation components during a HAB event. These include incident command posts (ICPs) (in addition to and independent of more traditional EOCs), mobile ICPs, and resource staging areas.
- Stakeholders question how the REP program will approach evaluation of NIMS/ICS-specific components within a REP exercise.
- The activation of additional resources or mutual aid for backfill during a HAB scenario may be controlled by different agencies responsible for the protective action making decisions.

Category <u>1.c – Direction & Control</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) have the capability to control their overall response to an emergency.

Description The Task Force focused on how FEMA should evaluate the integration of off-site and on-site responders as part of the incident command structure. The Task Force also offered an opportunity for discussion of who is responsible for the direction and control of off-site responders once they arrive on-site at a nuclear power plant.

Number Comments Received on this Category of Evaluation Criteria: 95 (17%)

- Stakeholders identified a significant planning gap in that local, regional and site-specific
 plans do not currently include coordination of licensee actions with ORO incident
 command activities for non-traditional REP scenarios. If there is cause to suspect the
 potential of a concurrent radiological release or HAB incident, there is currently no
 mechanism in place to ensure the coordination of the HAB incident command with
 radiological incident command.
- During a HAB scenario, law enforcement will likely be the first response agency called or notified. A HAB scenario will also place law enforcement – and possibly military units – in the initial lead role, rather than emergency management. This will necessitate a major change in approach and evaluation criteria for REP exercise evaluation.
- Direction and control of ORO resources during a HAB scenario requires bi-directional communication between the ORO (including incident command) and the licensee. This bi-directional communication will also necessitate that OROs have the ability to initiate the communication and coordination process from outside of the nuclear power plant site.
- Stakeholders overwhelmingly agreed that evaluation of direction and control during a HAB scenario should focus on demonstration of coordination rather than on demonstration of specific actions or tactics.
- A HAB scenario will result in an increase in the number of required resources for a REP exercise. Within the REP Program, FEMA does not currently have the ability to evaluate these additional resources (tactical law enforcement actions, bomb squads, etc.). This will require further discussion and examination in terms of the agency's authorization and qualifications to evaluate non-traditional REP players during a HAB scenario.

Category <u>1.d – Communications Equipment</u>

This sub-element is derived from NUREG 0654, which provides that Offsite Response Organizations (OROs) should establish and operate 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), incident command posts (ICPs), and field teams.

Description The Task Force explored whether OROs have sufficient communications capabilities to coordinate with on-site responders and if there is a straightforward way to demonstrate communications protocols.

Number Comments Received on this Category of Evaluation Criteria: 29 (5%)

- Interoperability between law enforcement and traditional REP responders is an area that needs to be addressed for evaluation of HAB scenarios.
- EOCs have the capability to communicate with near-site and/or on-site ICPs, although these capabilities have not been readily trained to or exercised.
- Communications equipment is less of a concern than the communications links and pathways required to support a HAB scenario or event.
- Plans, processes, and protocols exist for the communications capabilities required to support a HAB scenario; however, these policies remain largely untested in exercise or real-world environments.

Category 1.e – Equipment and Supplies to Support Operations

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) have emergency equipment and supplies adequate to support the emergency response.

Description The Task Force explored the challenges of providing dosimetry and KI to specialized response teams (e.g. SWAT, bomb squads, USAR) that may be needed during HAB scenarios, but are not currently identified within regional and site-specific plans and procedures. The Task Force also focused on how OROs should demonstrate radiological exposure control for non-traditional REP responders during exercises or out-of-sequence drills.

Number Comments Received on this Category of Evaluation Criteria: 17 (3%)

- Clarify who is responsible for providing dosimetry to additional resources that may be needed to respond to a HAB scenario.
- Passive dosimetry exists, although it is not calibrated to occupational exposure limits.
- OROs will likely have to utilize active dosimetry to appropriately monitor and follow occupational exposure limits.

Category <u>2.a – Emergency Worker Exposure Control</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) have the capability to assess and control the radiation exposure received by emergency workers and have a decision chain in place, as specified in the ORO's plans and/or procedures, to authorize emergency worker exposure limits to be exceeded for specific missions.

Radiation exposure limits for emergency workers are the recommended accumulated dose limits or exposure rates that emergency workers may be permitted to incur during an emergency. These limits include any pre-established administrative reporting limits (that take into consideration Total Effective Dose Equivalent [TEDE] or organ-specific limits) identified in the ORO's plans and/or procedures.

Description The Task Force examined whether current ORO emergency worker exposure control processes are agile enough to allow for authorization (on-site or off-site) to exceed pre-authorized dose levels to support lifesaving and/or protection of valuable property associated with a HAB scenario.

Number Comments Received on this Category of Evaluation Criteria: 57 (10%)

- Training and integration of on-site and off-site responders with regard to emergency worker dose control is needed.
- Balancing and prioritization of the necessity for exposure control, when weighed against the immediacy of addressing a HAB event.
- Stakeholders expressed concerns over who retains authority to make command decisions and PADs during a HAB scenario for onsite and offsite resources.
- The difference between plant exposure limits and ORO responder exposure limits during a HAB scenario needs to be reviewed and addressed.
- Stakeholders expressed concern that the discussion of ORO exposure limits while on-site presumes a radiological release has actually occurred.
- Joint planning is required to identify whether OROs train and exercise for on-site exposure control or whether there is a requirement for just in time training of ORO response personnel when they arrive at the scene of an on-site emergency.

Category 2.b – Dose Assessment and Protective Action Recommendations and Decisions for the Emergency Event

This sub-element is derived from NUREG 0654, which provides that Offsite Response Organizations (OROs) have the capability to use all available data to independently project integrated dose from exposure rates or other information and compare the estimated dose savings with the PAGs. OROs have the capability to choose, among a range of protective actions, those most appropriate in a given emergency situation. OROs 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, incident command), availability of appropriate in-place shelter, weather conditions, and situations (to include hostile action-based events, the threat posed by the specific hostile action, the affiliated response, and the effect of an evacuation on the threat response effort) that create higher than normal risk from evacuation.

- **Description** The Task Force recognized that HAB scenarios may introduce challenges and additional risks associated with implementation of pre-designated precautionary actions and evacuation plans. The Task Force examined the factors that should be incorporated into the precautionary or PAD-making process for HAB scenarios including:
 - Who is responsible for PADs?
 - How the PAD process should be coordinated with the Incident Command Structure during hostile action-based scenarios.
 - Should personnel, in addition to officials with traditional REP responsibilities, be included in the PAD process for HAB scenarios?
- **Number** Comments Received on this Category of Evaluation Criteria: 56 (10%)

- Traditional REP PADs are prescribed and objective whereas HAB PADS are more subjective in nature, dependent upon the scenario.
- Stakeholders noted a disparity between traditional REP PADs and PADs made during a HAB scenario. Traditional REP PADs are typically associated with a possible accidental radiological release, while HAB PADs would be made to protect the public from hostile actions not necessarily associated with a release.
- During a HAB scenario there will likely be reduced or limited essential information coming from the plant. This may impact the OROs' ability to make PADs.
- There will be more advisors, input, and advice involved in the PAD making process for a HAB scenario than for a traditional REP scenario.
- Off-site evaluation criteria are being adapted for on-site response.
- Traditional REP response agencies have different statutory authority and decisionmaking processes for evacuations than incident command. This may create a situation where incident command decides to initiate an evacuation due to a hostile threat or action, rather than due to specific conditions within the traditional REP decision-making process.
- The REP Program will have to address the gaps and overlapping issues that exist between the licensee plans that are required under the Critical Infrastructure (CI) Program and those that are required under the REP program.

Category <u>2.c – Protective Action Decisions Considerations for the Protection of Special</u> Populations

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should have the capability to determine protective action recommendations, including evacuation, sheltering and use of potassium iodide (KI), if applicable, for special population groups (e.g., hospitals, nursing homes, correctional facilities, schools, licensed day care centers, mobility impaired individuals, and transportation dependent individuals). Focus is on those special population groups that are (or potentially will be) affected by a radiological release from a nuclear power plant.

Description The Task Force recognized that HAB scenarios may introduce challenges and additional risks associated with implementation of pre-designated precautionary actions and evacuation plans for special populations.

Number Comments Received on this Category of Evaluation Criteria: 16 (3%)

Primary Issues

 Traditional REP response agencies have different statutory authority and decisionmaking processes for evacuations than incident command. This may create a situation where incident command decides to initiate an evacuation for special populations due to a hostile threat or action, rather than due to specific conditions within the traditional REP decision-making process.

Category <u>3.d. – Implementation of Traffic and Access Control</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) have the capability to implement protective action plans and/or procedures, including relocation and restriction of access to evacuated/sheltered areas. This sub-element focuses on selecting, establishing, and staffing of traffic and access control points and removal of impediments to the flow of evacuation traffic.

Description The Task Force focused on whether there should be any additional responsibilities for traffic and access control point (TCP/ACP) staff during a HAB scenario. They also discussed what additional impediments, if any, may exist inbound or outbound to the EPZ during a HAB scenario.

Number Comments Received on this Category of Evaluation Criteria: 27 (5%)

- Stakeholders indicated substantive differences in mindset, resources, and capabilities needed during a HAB scenario versus a traditional REP scenario.
- Law enforcement investigation of criminal activity may introduce new challenges such as short staffing and delays at TCPs due to the need to search suspicious vehicles or persons of interest.
- Stakeholders were concerned about the potential role credentialing will play in the traffic and access control process, particularly from the perspective of development and implementation.
- With law enforcement resources allocated to the criminal and investigative aspects of a HAB scenario, mutual aid or even non-traditional personnel may be used to staff TCPs and ACPs. This will make it difficult for players to meet the time and effectiveness requirements of back-up route alerting notification.

Category <u>4.a – Plume Phase Field Measurements and Analyses</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should have the capability to deploy field teams with the equipment, methods, and expertise necessary to determine the location of airborne radiation and particulate deposition on the ground from an airborne plume. In addition, NUREG-0654 indicates that OROs should have the capability to use field teams within the plume exposure pathway emergency planning zone to detect airborne radioiodine in the presence of noble gases and to detect radioactive particulate material in the airborne plume. In the event of an incident at a nuclear power plant, the possible release of radioactive material may pose a risk to the nearby population and environment. Although incident assessment methods are available to project the extent and magnitude of a release, these methods are subject to large uncertainties. During an incident, it is important to collect field radiological data in order to help characterize any radiological release. Adequate equipment and procedures are essential to such field measurement efforts.

Description The Task Force explored the measures necessary to protect the safety of field teams during a HAB event.

Number Comments Received on this Category of Evaluation Criteria: 42 (7%)

- Communication with and coordination of field teams is the greatest challenge brought about by a HAB scenario. Notifications and requests will possibly come from multiple non-traditional sources.
- HAB scenarios introduce the real possibility of non-traditional deployment scenarios such as no-release scenarios. Under a HAB scenario, the emergency operations facility (EOF) may not be activated. There is a need to identify where requests for field teams would come from and to develop evaluation plans that cover these contingencies.
- Field teams will need to have greater flexibility and heightened situational awareness of their operating environment for HAB scenarios.
- OOS activities should be used to accomplish demonstration and evaluation of field teams.

Category <u>5.a – Activation of the Prompt Alert and Notification System</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should have the capability to provide prompt instructions to the public within the plume exposure pathway Emergency Planning Zone (EPZ). Specific provisions addressed in this sub-element are derived from the Nuclear Regulatory Commission (NRC) regulations (10 CFR § 50, Appendix E.IV.D), and the Guide for the Evaluation of Alert and Notification Systems for Nuclear Power Plants, FEMA–REP–10 (November 1985).

Description The Task Force discussed how OROs would complete public alert and notification during HAB exercises assuming a failure of electronic notification systems (e.g., tone alert radios, sirens, reverse 911). The Task Force was specifically asked to consider additional methods for promptly alerting and notifying the public (besides backup route alerting) and to review the 45-minute timeframe requirement for backup route alerting.

Number Comments Received on this Category of Evaluation Criteria: 37 (7%)

- A communications failure should not be presumed as a scenario element, simply because an HAB event has occurred. Communications may remain intact, in spite of the HAB event.
- Stakeholders felt that there were a number of non-traditional methods and technologies available that should be explored to facilitate backup alerting during a HAB scenario.
- During a HAB scenario, fire and law enforcement will likely be committed to other higher priority tasks. This will effectively reduce their capability to complete public alert and notification. The use of mutual aid resources or other response disciplines will be required to complete this task.
- The 45-minute requirement may be too tight of a timeframe to complete the alerting requirement during a HAB scenario.

Category <u>5.b – Emergency Information and Instructions for the Public and the Media</u>

This sub-element is derived from NUREG-0654, which provides that Offsite Response Organizations (OROs) should have the capability to disseminate to the public appropriate emergency information and instructions, including any recommended protective actions. In addition, NUREG-0654 provides that OROs should ensure that the capability exists for providing information to the media. This includes the availability of a physical location for use by the media during an emergency. NUREG-0654 also provides that a system should be available for dealing with rumors. This system will hereafter be known as the "public inquiry hotline".

Description The Task Force explored what would be needed to guide the release of public information during a HAB scenario. The issue was framed by the assumption that certain information may need to be withheld from release due to the nature of the law enforcement and investigative response to a HAB event. The Task Force was also asked to develop guidance on minimal content for EAS messages, the type of information that can be released, and the appropriate authorities to release it during HAB events.

Number Comments Received on this Category of Evaluation Criteria: 68 (12%)

- Traditional REP processes for releasing information will need to be adapted to accommodate the review for potential law enforcement sensitive information that may need to be withheld during HAB scenarios.
- Successfully exercising the release of public information during a HAB scenario will require the participation of additional law enforcement and investigative players with critical roles in public information dissemination in the exercise (e.g., FBI, DHS, etc.).
- The accurate release of public information remains an imperative even during a HAB event. The additional players, structures, and processes should not impede the flow of public information.
- While the nature and composition of public information will change during a HAB event, the structures and processes, such as public information entities, joint information centers (JICs), and local/regional plans and procedures remain a sound foundation to build from.
- In some cases, HAB events may take the responsibility for public release of radiological release-specific information out of the hands of EOCs as they may not be activated at the onset and early stages of a HAB event.