



South Texas Project Electric Generating Station P.O. Box 289 Wadsworth, Texas 77483

February 2, 2009  
U7-C-STP-DHS-090001

U.S. Department of Homeland Security  
Federal Emergency Management Agency  
Attention: Vanessa Quinn  
Chief Radiological Emergency Preparedness Branch  
1800 Bell Street  
Arlington, VA 20598-3025

South Texas Project  
Units 3 and 4  
Docket Nos. 52-012 and 52-013  
Responses to Request for Additional Information

Reference: Letter, Vanessa Quinn to Gregory Gibson, "Federal Emergency Management Agency's (FEMA) Final Request for Additional Information (RAI) for the NRG Energy, South Texas Project (STP) Units 3 & 4 Combined License (COL) Application," dated November 25, 2008.

Attached are responses to FEMA staff questions included in Request for Additional Information (RAI) referenced letter dated November 25, 2008. Attachments 1 through 45 include responses to the RAI questions listed below, which comprise responses to all FEMA RAIs:

- |         |         |         |         |         |
|---------|---------|---------|---------|---------|
| STP 001 | STP 002 | STP 003 | STP 006 | STP 007 |
| STP 008 | STP 009 | STP 010 | STP 011 | STP 012 |
| STP 013 | STP 014 | STP 015 | STP 016 | STP 017 |
| STP 020 | STP 022 | STP 024 | STP 025 | STP 027 |
| STP 028 | STP 029 | STP 030 | STP 031 | STP 033 |
| STP 034 | STP 035 | STP 036 | STP 037 | STP 038 |
| STP 039 | STP 040 | STP 042 | STP 043 | STP 044 |
| STP 045 | STP 046 | STP 047 | STP 048 | STP 049 |
| STP 050 | STP 051 | STP 052 | STP 053 | STP 055 |

When a change to the State and County Plans or Procedures is indicated, the change will be incorporated into the next routine revision of these Plans and Procedures following FEMA acceptance of the RAI response.

There are no commitments in this letter.

Ax45  
D091  
NRO

If you have any questions regarding these responses, please contact me at (361) 972-7136, or Bill Mookhoek at (361) 972-7274.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2/2/09



Scott Head  
Manager, Regulatory Affairs  
South Texas Project Units 3 & 4

fp

Attachments:

- |                      |                      |
|----------------------|----------------------|
| 1. Question STP 001  | 2. Question STP 002  |
| 3. Question STP 003  | 4. Question STP 006  |
| 5. Question STP 007  | 6. Question STP 008  |
| 7. Question STP 009  | 8. Question STP 010  |
| 9. Question STP 011  | 10. Question STP 012 |
| 11. Question STP 013 | 12. Question STP 014 |
| 13. Question STP 015 | 14. Question STP 016 |
| 15. Question STP 017 | 16. Question STP 020 |
| 17. Question STP 022 | 18. Question STP 024 |
| 19. Question STP 025 | 20. Question STP 027 |
| 21. Question STP 028 | 22. Question STP 029 |
| 23. Question STP 030 | 24. Question STP 031 |
| 25. Question STP 033 | 26. Question STP 034 |
| 27. Question STP 035 | 28. Question STP 036 |
| 29. Question STP 037 | 30. Question STP 038 |
| 31. Question STP 039 | 32. Question STP 040 |
| 33. Question STP 042 | 34. Question STP 043 |
| 35. Question STP 044 | 36. Question STP 045 |
| 37. Question STP 046 | 38. Question STP 047 |
| 39. Question STP 048 | 40. Question STP 049 |
| 41. Question STP 050 | 42. Question STP 051 |
| 43. Question STP 052 | 44. Question STP 053 |
| 45. Question STP 055 |                      |

cc: w/o attachment except\*

(paper copy)

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FEMA RAI STP 001

**Subject:** Primary and support roles for response organizations

**Basis:** NUREG 0654, Criterion C.1.a

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

Texas Emergency Management Plan (TEMP), Annex D, Tab 1: Identify or provide clear references to the key official(s) authorized to request Federal assistance.

**Response:**

Annex N, Appendix 2, Section 2.D.2).a) will be added to C.1.a to the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

The above reference states "all requests for federal assistance must be approved by the Chief, GDEM, or a State Coordinator serving in the SOC".

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to this RAI.

Upon revision of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' the COLA will be updated.

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

Number	Criteria	Location
A1 a	Overall response organization identification	Annex D, Section V.B Annex D, Appendix 1 Annex D, Tab 1, Section VI.A.2 Annex D, Tab 1, Section VI.B.1-2 Annex D, Tab 1, Section VII. A-G
b	Organizational concept of operations	Annex D, Section IV.A.I Annex D, Tab 1, Section VII Annex D, Tab 1, Chapter 1, Section VI Annex D, Tab 1, Chapter 1, Section VII. A-C Annex D, Tab 1, Chapter 2, Section VI Annex D, Tab 1, Chapter 2, Section VII.A-C Annex D, Tab 2, Chapter 1, Section VI Annex D, Tab 2, Chapter 1, Section VII.A-C
c	Organizational interrelationships-block diagram	Annex D, Tab 1, Attachment 1
d	Identification of individual in charge	Annex D, Tab 1, Chapter 1, Section V, (end of first paragraph) Annex D, Tab 1, Chapter 2, Section V, (end of first paragraph) Annex D, Tab 2, Chapter 1, Section V, (end of first paragraph)
e	24-hr. response capability including communications	Annex D, Appendix 2, 1.b.10) Annex D, Section V.B.1.b Annex D, Tab 1, Chapter 1, Section V, (last sentence of last paragraph) Annex D, Tab 1, Chapter 2, Section V, (last sentence of last paragraph) Annex D, Tab 2, Chapter 1, Section V, (last sentence of last paragraph) Procedure 13, Section IV
A2 a	Specifications of functions and responsibilities of key individuals	Annex D, Tab 1, Chapter 1, Section VII.C.1-11 Annex D, Tab 1, Chapter 2, Section VII.C.1-11 Annex D, Tab 2, Chapter 1, Section VII.C.1-15 Procedure 13, Section III
b	Legal basis of authority	Annex D, Section I.A-B

**TAB 5 TO ANNEX D**  
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A3	Written agreements referring to concept of operations	Annex D, Section IV.A.2-3 Annex D, Tab 1, Section VII.G Annex D, Tab 1, Attachments 2 and 3 Annex D, Tab 1, Chapter 1, Section II.A.3 Annex D, Tab 1, Chapter 2, Section III.C.3, (last sentence)
A4	Provisions for 24-hr. operations/continuity of resources	Annex D, Tab 1, Section VII.G Annex D, Tab 1, Chapter 1, Section V Annex D, Tab 1, Chapter 2, Section III.C.1 Annex D, Tab 1, Chapter 2, Section V Annex D, Tab 2, Chapter 1, Section V Annex D, Tab 2, Chapter 1, Section VII.C Annex D, Tab 2, Chapter 1, Section VII.C.3 Procedure 13, Section IV.C.2 Procedure 13, Attachment 4
C1 a	Persons by title authorized to request Federal assistance	Texas Emergency Management Plan, Basic Plan, Section IV.C.6.f Annex D, Tab 1, Section VI.B.4-5 <u>Annex N, Appendix 2, Section 2.D.2.a</u>
b	Federal resources expected, including expected times of arrival	Annex D, Section IV.B.2 Annex D, Tab 1, Section VI.B.6 Annex D, Tab 1, Chapter 1, Section III.D <u>Annex D, Tab 1, Chapter 2, Section III.D.1</u> Annex D, Tab 2, Chapter 1, Section III.B
c	State and local resources available to support the Federal response	Annex D, Tab 1, Section VI.B.6, (last sentence) Annex D, Tab 1, Chapter 1, Section III (III.C.1. for Federal Liaison support) Annex D, Tab 1, Chapter 2, Section III (III.C.1. for Federal Liaison support) Annex D, Tab 2, Chapter 1, Section III.A.1 (for Federal Liaison support) Annex D, Tab 2, Chapter 1, Section VII.B.1 Annex D, Tab 2, Chapter 1, Section VII.C.10

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

C2 a	Offsite organization dispatch representatives to the licensee EOF	<p>Annex D, Section V.B.2.e  Annex D, Tab 1, Chapter 1, Section III.B.1, (last sentence)  Annex D, Tab 1, Chapter 1, Section VII.A.6  Annex D, Tab 1, Chapter 1, Section VII.C.1  Annex D, Tab 1, Chapter 2, Section III.B.1  Annex D, Tab 1, Chapter 2, Section VII.A.2  Annex D, Tab 1, Chapter 2, Section VII.C.1  Annex D, Tab 2, Chapter 1, Section VII.A.6  Annex D, Tab 2, Chapter 1, Section VII.C.5</p>
C3	Identify radiological laboratories and their general capabilities and expected availability	<p>Annex D, Section IV.G.1  Annex D, Tab 1, Section VII.G  Annex D, Tab 1, Section VII.D.1-4  Annex D, Tab 1, Attachments 2 and 3  Annex D, Tab 1, Chapter 1, Section VII.C.4-5  Annex D, Tab 1, Chapter 2, Section VII.C.4-5  Annex D, Tab 2, Chapter 1, Section VII.C.9</p>
C4	Identification of organization/assistance to be relied on	<p>Annex D, Section IV.A.2  Annex D, Section IV.I.1-5  Annex D, Section V.B.3.a-f  Annex D, Tab 1, Section VI.B.1-4  Annex D, Tab 1, Section VII.A-G  Annex D, Tab 1, Attachments 2 and 3  Annex D, Tab 1, Chapter 1, Section III  Annex D, Tab 1, Chapter 2, Section III  Annex D, Tab 2, Chapter 1, Sections II-III</p>
D3	Establishment of emergency classification scheme	<p>Annex D, Tab 1, Section VII.A.2  Annex D, Tab 1, Chapter 1, Section IV  Annex D, Tab 1, Chapter 2, Section IV &amp; V  Annex D, Tab 2, Chapter 1, Section IV</p>
D4	Provisions for emergency actions	<p>Annex D, Tab 1, Chapter 1, Section V  Annex D, Tab 1, Chapter 2, Section V  Annex D, Tab 2, Chapter 1, Section V  Procedure 1, Section II  Procedure 1, Section VII.B.2.a-e  Procedure 1, Attachments 1 &amp; 2  Procedure 13, Section IV.B</p>

**TAB 5 TO ANNEX D**  
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E1	Establishment of notification procedure/verification of receipt	Annex D, Appendix 2, Section 2.a-e Annex D, Tab 1, Section VII.A.3,4,&10 Annex D, Tab 1, Section VII.B.1
E2	Establishment of personnel alerting, notifying, and mobilizing procedures	Annex D, Appendix 2, Section 2.b-e Annex D, Tab 1, Chapter 1, Section V Annex D, Tab 1, Chapter 2, Section V Annex D, Tab 2, Chapter 1, Section V Procedure 13, Section IV.B Procedure 13
E5	Establish a system for disseminating to the public information contained in initial and follow-up messages	Annex D, Appendix 2, Section 2.b-e Annex D, Tab 1, Section VII.B.4 Annex D, Tab 1, Section VII.F.1 Annex D, Tab 1, Chapter 1, Section III.B.2 Annex D, Tab 1, Chapter 1, Section VII.C.8 Annex D, Tab 1, Chapter 2, Section III.B.2 Annex D, Tab 1, Chapter 2, Section VII.C.8 Annex D, Tab 2, Chapter 1, Section VII.C.13
E6	Establish administrative and physical means, and the time required for notifying the public within the plume	Texas Emergency Management Plan, Basic Plan, Section IV.C.2.c Annex A, Section IV.B.2.i Annex A, Section IV.C.1 & 2 Annex D, Appendix 2, Section 2.b-e Annex D, Tab 1, Section VII.B.4 Annex D, Tab 1, Chapter 1, VII.C.8 Annex D, Tab 1, Chapter 2, Section VII.C.8 Annex D, Tab 2, Chapter 1, Section VII.C.13
E7	Provide written messages intended for the public	Annex D, Tab 2, Chapter 1, Section VIII.A-C <del>Procedure 1, Section VII.B.2.a &amp; e</del> <del>Procedure 1, Section VII.B.1-2</del> Procedure 2, Attachments 2-3 <del>Procedure 14, Attachment 2 (In Draft)</del>
F1 a	24-hr. primary and backup provision for notification and activation of local emergency network	Annex D, Tab 1, Section VII.A.7-8 Annex D, Tab 1, Section VII.B.5 Procedure 13, Section III.A.2 Procedure 13, Section IV.A.1-3

**TAB 5 TO ANNEX D**  
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b	Primary and backup communications with contiguous state/local governments	Annex D, Appendix 2, Section 2.h.3-4 Procedure 13, Attachment 3
c	Primary and backup communications with federal organizations	Annex D, Appendix 2, Section 2.e.1-3 Annex D, Appendix 2, Section 2.h.5-6 Procedure 13, Section IV.H.2
d	Primary and backup communications between nuclear facility, state/local EOCs and field teams	Annex D, Tab 1, Chapter 1, Section VII.B.1, (last sentence) Annex D, Tab 1, Chapter 1, Section VII.C.8, (last sentence) Annex D, Tab 1, Chapter 2, Section VII.B.1, (last sentence) <u>Annex D, Tab 1, Chapter 2, Section VII.C.1</u> Procedure 10, Section VIII.E.1-2 Procedure 13, Attachment 3
e	Primary and backup alerting and activating of emergency personnel	Annex D, Appendix 2, Section 2.b <u>Procedure 13, Section IV.D.(c)</u> Procedure 13, Section IV.H.1-3
F2	Primary and backup communications link to medical support facilities	Annex B, Section III.A Annex D, Tab 1, Section IV Procedure 5, Attachment 2 <u>Procedure 13, Attachment 3</u> Procedure 24, Section V.L
F3	Periodic testing of communications system	Annex D, Tab 1, Attachment 4, Section II.B-C
G1	Provide a coordinated periodic (at least annually) dissemination of information to the public	Annex D, Tab 1, Section VII.F.1&8 Annex D, Tab 1, Attachment 4, Section I.B.9 Procedure 14, Attachment 3
G2	Provide permanent and transient population opportunity to become aware of the public information annually.	Annex D, Tab 1, Chapter 1, Section II.A.3, (last sentence of 1 <sup>st</sup> par) Annex D, Tab 1, Chapter 2, Section II.A.3, (last sentence of 1 <sup>st</sup> par) Procedure 14, Attachment 3
G3 a	Designate points of contact and physical locations for use by news media during an emergency	Annex D, Tab 1, Chapter 1, Section III.B.2 Annex D, Tab 1, Chapter 1, Section VII.C.8 Annex D, Tab 1, Chapter 2, Section III.B.2 Annex D, Tab 1, Chapter 2, Section VII.C.8 Annex D, Tab 2, Chapter 1, Section VII.C.13 Annex D, Tab 2, Chapter 1, Attachment 2

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G4 a	Designate a spokesperson who should have access to all necessary information	Annex D, Tab 1, Chapter 1, Section VII.C.8 Annex D, Tab 1, Chapter 2, Section VII.C.8 Annex D, Tab 2, Chapter 1, Section VII.C.13
b	Establish arrangements for timely exchange of information among designated spokespersons	Annex D, Tab 1, Section VII.A.6-7
c	Establish coordinated arrangements for dealing with rumors	Annex D, Tab 1, Chapter 1, Section III.B.2 Annex D, Tab 1, Chapter 2, Section III.B.2 Annex I, Section IV, C.1-2 Procedure 13, Attachment 3 Procedure 14, Attachment 1, 21st checkbox (In Draft)
G5	Conduct coordinated programs at least annually to acquaint news media with the emergency plans	Annex D, Tab 1, Section VII.A.14 Annex D, Tab 1, Attachment 4, Section I.B.9 Annex D, Tab 1, Attachment 4, Section II.A
H3	Establish an emergency operations center for use in directing and controlling response functions	Annex D, Tab 1, Chapter 1, Section III.C.1-2 Annex D, Tab 1, Chapter 1, Attachments 9-10 Annex D, Tab 1, Chapter 2, Section III.C.1-2 Annex D, Tab 1, Chapter 2, Attachments 9-10 Annex D, Tab 2, Chapter 1, Section III.A.1-2 Annex D, Tab 2, Chapter 1, Attachments 2-4 Procedure 10, Section VII.A.2 Procedure 11, Section VII.A.2
H4	Provide for timely activation and staffing of the facilities and centers	Annex D, Section IV.B.1 Annex D, Tab 1, Chapter 1, Section VI Annex D, Tab 1, Chapter 2, Section VI Annex D, Tab 2, Chapter 1, Section VI Procedure 13, Section IV.B

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H7	Provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility	Annex D, Tab 2, Chapter 1, Section VII.B.2 Annex D, Tab 2, Chapter 1, Section VII.C.9 Procedure 3, Section IV.A Procedure 5, Section IV.A-B Procedure 7, Section IV.A-C Procedure 7, Section VII.E Procedure 10, Section V Procedure 10, Attachment 1 Procedure 10, Tab 1, Section III Procedure 11, Section V Procedure 24, Section IV.A-F Procedure 25, Section IV.A-D
H10	Inspect, inventory and operationally check emergency equipment/instruments each quarter and after each use	Annex D, Tab 1, Attachment 4, Section I.B.10 Procedure 10, Section VIII.C.4 Procedure 10, Attachments 4 & 5 Procedure 11, Section VIII.C.1&5
H11	In an appendix, include identification of emergency kits by general category	Procedure 1, Section IV.A Procedure 3, Section IV.A-C Procedure 4, Section IV.A-I Procedure 5, Section IV.C-Z Procedure 6, Section IV.A-E Procedure 7, Section IV.D Procedure 8, Section IV.A-C Procedure 9, Section IV.A Procedure 10, Attachments 1-2 Procedure 10, Tab 1, Section III Procedure 10, Tab 2, Section III Procedure 10, Tab 3, Section III Procedure 10, Tab 4, Section III Procedure 10, Tab 5, Section III Procedure 11, Section XII.A-E Procedure 11, Attachments 1-3 Procedure 24, Attachment 1 Procedure 26, Section IV.A-K

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<p>H12</p>	<p>Establish a central point for the receipt and analysis of all field monitoring data and coordination of sample media.</p>	<p>Annex D, Tab 1, Chapter 1, Section VII.C.4-5 Annex D, Tab 1, Chapter 2, Section VII.C.4-5 Annex D, Tab 2, Chapter 1, Section VII.C.4-5 Procedure 10, Attachment 7 Procedure 10, Tab 1, Section V Procedure 10, Tab 2, Section V.b Procedure 10, Tab 3, Section V.a Procedure 10, Tab 4, Section V.a Procedure 10, Tab 5, Section V.b</p>
<p>I7</p>	<p>Describe the capability and resources for field monitoring within the plume</p>	<p>Annex D, Section III.G.1&amp;3 Annex D, Section V.B.1.e Annex D, Sections V.B.3.c, d.(3), e.(2), and f Annex D, Tab 1, Section VII.B.5 Annex D, Tab 1, Section VII.C.2-5 Annex D, Tab 1, Section VII.E.3 Annex D, Tab 1, Attachments 2 &amp; 3 Annex D, Tab 1, Chapter 1, Section VI (last sentence of first paragraph) Annex D, Tab 1, Chapter 1, Section VII.B.1 Annex D, Tab 1, Chapter 1, Section VII.C.2-3 &amp; 10 Annex D, Tab 1, Chapter 2, Section VI (last sentence of first paragraph) Annex D, Tab 1, Chapter 2, Section VII.B.1 Annex D, Tab 1, Chapter 2, Section VII.C.2-3 &amp; 9 Annex D, Tab 2, Chapter 1, Section III.B.2.f &amp; 3.b Annex D, Tab 2, Chapter 1, Section VII.C.7 &amp; 14</p>
<p>I8</p>	<p>Provide methods, equipment, expertise for assessments of the actual or potential radiological hazards</p>	<p>Annex D, Section IV.E.1-2 Annex D, Tab 1, Chapter 1, Section VI Annex D, Tab 1, Chapter 1, Section VII.B.1-2 Annex D, Tab 1, Chapter 1, Section VII.C.3 Annex D, Tab 1, Chapter 2, Section VI Annex D, Tab 1, Chapter 2, Section VII.B.1-2 Annex D, Tab 1, Chapter 2, Section VII.C.3 Annex D, Tab 2, Chapter 1, Section VI Annex D, Tab 2, Chapter 1, Section VII.B.1 Annex D, Tab 2, Chapter 1, Section VII.C.7 Procedure 10 Procedure 10, Section III.B Procedure 10, Section VIII.A-F</p>

**TAB 5 TO ANNEX D**  
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I9	Capability to detect and measure radioiodine concentrations in air under field conditions	Annex D, Tab 1, Chapter 1, Section VII.C.3 Annex D, Tab 1, Chapter 2, Section VII.C.3 Annex D, Tab 2, Chapter 1, Section VII.C.3 Procedure 10
I10	Establish means for relating the various measured parameters to dose rates for key isotopes	Annex D, Section IV.F.1 Annex D, Tab 1, Chapter 1, Section VII.C.6 Annex D, Tab 1, Chapter 2, Section VII.C.6 Annex D, Tab 2, Chapter 1, Section VII.C.10 Procedure 1, Section IV.A Procedure 1, Section VII.B Procedure 10, Tab 1, Section VI.a-b Procedure 11, Section IX.A
I11	Arrangements to locate and track the airborne radioactive plume using either or both Federal and State resources.	Annex D, Section IV.E.2.(2) Annex D, Section V.B.2.f Annex D, Tab 1, Section VI.B.6 Annex D, Tab 1, Chapter 1, Section VII.C.2-4 Annex D, Tab 1, Chapter 2, Section VII.C.2-4 Annex D, Tab 2, Chapter 1, Section VII.C.7 Procedure 10, Section II Procedure 10, Section IX-X Procedure 11, Section II Procedure 11, Section XI.A-B
J2	Provide evacuation routes and transportation for onsite individuals to offsite location, including alternatives	Annex D, Tab 1, Section IV (reference) Annex D, Tab 1, Section VII.F.1&4 Annex D, Tab 1, Chapter 1, Attachment 5 Annex D, Tab 1, Chapter 2, Attachment 5 Annex D, Tab 2, Chapter 1, Attachment 7

**TAB 5 TO ANNEX D**  
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<p>J9</p>	<p>Establish capability for implementing protective measures based upon protective action guides</p>	<p><u>Annex D, Section IV.A.3-4</u>          Annex D, Section IV.E.2.(4) &amp; <u>F.1(2)</u>          Annex D, Section V.B.2.f          Annex D, Tab 1, Chapter 1, Section VII.C.6          Annex D, Tab 1, Chapter 2, Section VII.C.6          Procedure 1, Section VII.B-C          Procedure 1, Attachments 1-4          Procedure 2, Section III  <u>Procedure 2, Section IV.A.3</u>          Procedure 10, Section VIII.F.3-5          Procedure 11, Section VIII.F.3          Procedure 11, Section IX.A          Procedure 24, Section V.A-G</p>
<p>J10 a</p>	<p>Maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas</p>	<p><u>Evacuation Routes</u>          Annex D, Tab 1, Chapter 1, Attachment 5          Annex D, Tab 1, Chapter 2, Attachment 5          Annex D, Tab 2, Chapter 1, Attachment 7</p> <p><u>Evacuation Areas (Emergency Response Zones)</u>          Annex D, Tab 1, Chapter 1, Attachment 12          Annex D, Tab 1, Chapter 2, Attachment 4          Annex D, Tab 2, Chapter 1, Attachment 1</p> <p><u>Pre-Selected Monitoring Points</u>          Annex D, Tab 1, Chapter 1, Attachment 3          Annex D, Tab 1, Chapter 2, Attachment 3          Annex D, Tab 2, Chapter 1, Attachment 6</p> <p><u>Relocation Centers, Shelter Areas &amp; Hospitals</u>          Annex D, Tab 1, Chapter 1, Attachments 11-12          Annex D, Tab 1, Chapter 2, Attachments 9-10          Annex D, Tab 2, Chapter 1, Attachment 2</p>
<p>b</p>	<p>Maps showing population distribution around the nuclear facility</p>	<p>Annex D, Tab 1, Chapter 1, Attachment 4          Annex D, Tab 1, Chapter 2, Attachment 4</p>

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c	Means for notifying all segments of the transient and resident population	<u>Annex A, Section IV.C.2</u> Annex D, Tab 1, Section VII.A.3 Annex D, Tab 1, Section VII.B.6 Annex D, Tab 1, Section VII.F.1-3 <u>Procedure 1, Section VII.B.1-2</u> <u>Procedure 14, Attachment 2</u>
d	Means for protecting persons whose mobility may be impaired	Annex D, Tab 1, Section VII.A.13 Annex E, Section IV.C.4 Annex E, Section IV.I Annex E, Section IV.J.1.d Annex H, Section IV.A.7.c Annex H, Section V.3.e.3 Procedure 9, Section VII.A (last sentence)
e	Provisions for the use of radioprotective drugs	Annex D, Tab 1, Section VII.A.13 Procedure 1, Section VII.B.2.d Procedure 1, Attachments 1-2 Procedure 9, Section I Procedure 9, Section II.C <u>Procedure 9, Section VII.A</u> <u>Procedure 9, Section VII.B.1</u> <u>Procedure 9, Attachment 3</u>
f	Method for decisions by the State for administering radioprotective drugs to the general population	Procedure 1, Section VII.B.2.d Procedure 1, Attachments 1-2 Procedure 8, Section II.B (last sentence) Procedure 9, Section V.D-E Procedure 9, Section VII.A Procedure 24, Section V.G Procedure 24, Section VIII.C.4
g	Means of relocation	Annex E, Section IV.H Annex E, Section V.B.3.b.7 & 10 Annex E, Section V.B.3.d.1 Annex S, Section IV.E.2 Annex S, Appendix 4 Procedure 1, Section VII.B.2.a Procedure 25, Section VIII

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h	Relocation centers which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume	Annex D, Tab 1, Chapter 1, Section II.A.3 Annex D, Tab 1, Chapter 1, Section VII.C.9 Annex D, Tab 1, Chapter 2, Section II.A.3 Annex D, Tab 1, Chapter 2, Section VII.C.10 Annex D, Tab 2, Chapter 1, Section II.A.3 Annex D, Tab 2, Chapter 1, Section VII.C.12
i	Projected traffic capacities of evacuation routes under emergency conditions	Annex E, Section IV.C.3 Procedure 1, Section VII.D (last sentence)
j	Control of access to evacuated areas and organization responsibilities for such control	Annex D, Section IV.F.3-4 Annex D, Tab 1, Chapter 1, Section VII.C.7 Annex D, Tab 1, Chapter 2, Section VII.C.7 Procedure 24, Section II. (second paragraph) Procedure 24, Section VIII.C.1
k	Identification and means for dealing with impediments to use of evacuation routes, and contingency measures	Procedure 24, Section VIII.C.2.b,c,d&h
l	Time estimates for evacuation of various sectors and distances based on a dynamic analysis	Evacuation Time Estimate
m	Bases for recommended protective actions from the plume exposure pathway during emergency conditions	Annex D, Tab 1, Section VII.F.2,5.6.7&9 Procedure 1, VII.B.2.a-e
J11	Specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated food stuffs	Annex D, Section IV.A.3 Annex D, Section IV.E.1-2 Annex D, Tab 1, Section VII.C & E Procedure 2 Procedure 10, Section II
J12	Describe the means for registering and monitoring of evacuees at relocation centers in host areas.	Annex D, Section IV.H.2 Procedure 25, Section VIII.A-B

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

K3 a	Make provision for 24-hour-per-day capability to determine the doses received by emergency personnel	<p>Annex D, Tab 1, Chapter 1, Section VII.C.4 (second paragraph)  Annex D, Tab 1, Chapter 1, Section VII.C.7 (middle of 4<sup>th</sup> paragraph)  Annex D, Tab 1, Chapter 2, Section VII.C.4 (second paragraph)  Annex D, Tab 1, Chapter 2, Section VII.C.7 (middle of 4<sup>th</sup> paragraph)  <u>Procedure 7, Section II</u>  Procedure 7, Section VII.D.8  Procedure 7, Section VII.E.1-6  Procedure 10, Section VIII.F.1  Procedure 11, Section VIII.F  Procedure 24, Section V.H  Procedure 25, Section IV.A-C  Procedure 25 Section VII.G</p>
	b Ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers	<p>Procedure 7, Section VII.D.2-5  Procedure 10, Section VIII.F.3&amp;7  Procedure 24, Section V.I  Procedure 25, Section V.H</p>
K4	Establish the decision chain for authorizing emergency workers to incur exposures in excess of EPA PAG's	<p>Procedure 1, Attachments 3-4  Procedure 7, Section VII.A-C  Procedure 10, Section VI.A  Procedure 10, Section VIII.F.4-5  Procedure 11, Section VI.A-B  Procedure 24, Section V.A-F  Procedure 25, Section V.A-E</p>
K5 a	Shall specify action levels for determining the need for decontamination	<p>Annex D, Section H  Procedure 5  Procedure 10, Section VIII.D  Procedure 11, Section X  Procedure 24, Section VIII.D.1.d-e.&amp;2.b  Procedure 25, Section VIII.B.2.c-f  Procedure 25, Section IX.C-D</p>
	b Shall establish the means for radiological decontamination and for waste disposal	<p>Annex D, Section IV.H.1  Procedure 5  Procedure 10, Section XII.C-D  Procedure 25, Section VIII.B.2.g-h  Procedure 25, Section VIII.B.5.j  Procedure 25, Section VIII.C.2</p>

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

L1	Arrange for local and backup hospital and medical services	Annex D, Section V.B.2.g Annex D, Tab 1, Chapter 2, Section III.A.3 Procedure 24, Section V.L Procedure 25, Section V.K Procedure 25, Section IX.A-B
L3	Shall develop lists indicating the location of hospitals and other emergency medical services	Procedure 5, Attachment 2
L4	Shall arrange for transporting victims of radiological accidents to medical support facilities.	Annex D, Tab 1, Chapter 2, Section III.A.3 Procedure 24, Section V.L Procedure 25, Section V.K Procedure 25, Section IX.A-B
M1	Shall develop general plans and procedures for reentry and recovery	Annex D, Section V.B.2.h Annex D, Appendix 2, Section 3 Procedure 22
M3	Shall specify means for informing members of the ORO's that a recovery operation is to be initiated	Procedure 22, Section II.D (second paragraph) Procedure 22, Section VII
M4	Shall establish a method for periodically estimating total population exposure	Procedure 1, Section VII.D
N1	a Shall simulate an emergency that results in offsite radiological releases and requires an offsite response	Annex D, Tab 1, Attachment 4, Section II.A
	b Shall include mobilization of State and local personnel and resources adequate to verify their capabilities	Annex D, Section V.B.g, page D-7 Annex D, Tab 1, Attachment 4, Section II.A
N2	a Each organization shall conduct drills, in addition to the annual exercise at the indicated frequencies	Annex D, Appendix 2, Section 1.a.1,3&5 Annex D, Appendix 2, Section 1.b.4 Annex D, Tab 1, Attachment 4, Section II.B.1&C.1-3
	d Radiological monitoring drills (onsite and offsite) shall be conducted annually	Annex D, Tab 1, Attachment 4, Section II.B.4
	e Health Physics drills shall be conducted semi-annually	Annex D, Tab 1, Attachment 4, Section II.B.4

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

N3	a	Shall describe how exercises and drills are to be carried out to allow free play for decision making and to meet the basic objective(s) of each drill and exercise and appropriate evaluation criteria;	<u>Annex D, Tab 1, Attachment 4, Section IV</u>
	b	The date(s), time period, place(s) and participating organizations	<u>Annex D, Tab 1, Attachment 4, Section IV.3</u>
	c	Simulated events	<u>Annex D, Tab 1, Attachment 4, Section IV.4</u>
	d	A time schedule of real and simulated initiating events	<u>Annex D, Tab 1, Attachment 4, Section IV.5</u>
	e	A narrative summary describing simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities; and	<u>Annex D, Tab 1, Attachment 4, Section IV.6</u>
	f	Description of the arrangements for and advance materials to be provided to official observers	<u>Annex D, Tab 1, Attachment 4, Section IV.7</u>
N4		Federal, State or local governments will observe, evaluate, and critique the required exercises	Annex D, Tab 1, Attachment 4, II. A (second paragraph)
N5		Establish means for evaluating observer and participant comments on areas needing improvement and for assigning responsibility for corrective actions.	Annex D, Tab 1, Attachment 4, Section II. A (last sentence)
O1		Shall assure the training of appropriate individuals	Annex D, Section V.B. 1.a&g Annex D, Section VIII. B Annex D, Appendix 2, Section 1.a.1&3 Annex D, Tab 1, Section VIII Annex D, Tab 1, Attachment 4
	b	Shall participate in and receive training where mutual aid agreements exist between local agencies such as fire, police and ambulance/rescue	Annex D, Section V.B. 1.a&g Annex D, Appendix 2, Section 1.a.2&3 Annex D, Tab 1, Attachment 4, Section I.A

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

O4	a	Shall establish a training program for directors or coordinators of the response organizations	Annex D, Tab 1, Attachment 4, Section I
	b	Personnel responsible for accident assessment	Annex D, Tab 1, Attachment 4, Section I.E
	c	Radiological monitoring teams and radiological analysis personnel	Annex D, Tab 1, Attachment 4, Section I.E
	d	Police, security and fire-fighting personnel	Annex D, Appendix 2, Section 1.a.2 Annex D, Tab 1, Attachment 4, Section I.F.1
	f	First aid and rescue personnel	Annex D, Appendix 2, Section 1.a.2&5 Annex D, Tab 1, Attachment 4, Section I.F.2
	g	Local support services personnel, including Civil Defense/Emergency Service personnel	Annex D, Appendix 2, Section 1.a.1-5 Annex D, Tab 1, Attachment 4, Section I.F.3
	h	Medical support personnel	Annex D, Appendix 2, Section 1.a.5 Annex D, Tab 1, Attachment 4, Section I.F.4
	J	Personnel responsible for transmission of emergency information and instructions	Annex D, Tab 1, Attachment 4, Section I.F.5
O5		Shall provide for the initial and annual retraining of personnel	Annex D, Tab 1, Attachment 4, Section I.A-B
P1		Shall provide for the training of individuals responsible for the planning effort	Annex D, Tab 1, Attachment 4, Section I.B.2
P2		Shall identify by title the individual with the overall authority and responsibility for radiological emergency	Annex D, Section X.A-C
P3		Shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans	Annex D, Section X.B & C
P4		Shall update its plan and agreements as needed, review and certify it to be current on an annual basis	Annex D, Section X.C Annual Letter of Certification

**TAB 5 TO ANNEX D**  
**Evaluation Criteria Cross Reference Index to NUREG 0654**

P5	Emergency response plans and approved changes to the plans shall be forwarded to all organizations	Annex D, Section V.B.2.d Annex D, Section X.B <u>Annex D, Appendix 1</u> <u>Annex D, Tab 1, Section IV</u>
P6	Plan shall contain a detailed listing of supporting plans and their source	Annex D, Appendix 1 <u>Annex D, Tab 1, Attachment 5</u>
P7	Plan shall contain as an appendix listing, by title, procedures required to implement the plan	Radiological Emergency Management Procedures Index <u>Annex D, Tab 1, Attachment 6</u>
P8	Plan shall contain a specific table of contents	Annex D, page D-iii (Table of Contents) Annex D, Tab 5, Cross reference
P10	Organization shall provide for updating telephone numbers in emergency procedures at least quarterly	Procedure 13, Section IV.H.1-3

DRAFT

FEMA RAI STP 002

**Planning Standard:** Subject: Primary and support roles for response organizations

**Basis:** NUREG 0654, Criterion C.1.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide an estimated time of arrival for federal assets that may be requested, either directly or through mutual assistance plans, such as SMRAP, during an emergency.

**Response:**

Revisions to Tab 1, Chapter 2, Section III.D.1 will be made to include Federal agencies estimated times of arrival to STP. The shaded text shown below will be inserted following the paragraph in Tab 1, Chapter 2, Section III.D.1.

Estimated times of arrival for Federal response to STP are the following:  
(Referenced in STP Emergency Plan, Section B.4)

a. Federal Emergency Management Agency – Approximately 10 hours

b. NRC Region IV Response Team in Arlington – Approximately 5 hours

c. Department of Energy – Approximately 12 hours

d. Environmental Protection Agency – Approximately 12 hours

Additionally, Tab 1, Chapter 2, Section III.D.1 will be added to C.1.b of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D Tab 1, Chapter 2, Section III.D.1 the COLA will be updated.

FEMA RAI STP 003

**Planning Standard:** Subject: Primary and support roles for response organizations

**Basis:** NUREG 0654, Criterion C.1.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide capabilities and availability of the primary laboratory in the plan and an updated cross-reference in Tab 5 of Annex D to indicate the location of the information.

**Response:**

Revisions to Tab 1, Section VII.D.1-4 will be made to include primary laboratory capabilities and availability. The marked up text changes to Tab 1, Section VII.D.1-4 will be revised as indicated below:

D. DEPARTMENT OF STATE HEALTH SERVICES (LABORATORIES)

1. Provide full staff and radiological monitoring and analysis services as needed, for the duration of the emergency.
2. Perform laboratory analyses on air, soil, vegetation, water, and/or milk samples collected during fixed nuclear facility accident response operations.
3. Provide qualified staff to perform laboratory analyses in the mobile laboratory.
4. Provide radiochemical and analytical capabilities annually to DSHS Radiation Control Program. These capabilities will be reported to FEMA in an Annual Letter of Certification.

Additionally, Tab 1, Section VII.D.1-4 will be added to C.3 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D Tab 1, Chapter 2, Section VII.D.1-4 the COLA will be updated.

FEMA RAI STP 006

**Planning Standard:** Subject: Primary and support roles for response organizations

**Basis:** NUREG 0654, Criterion E.7

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide details related to the drafting of information or provide draft messages that would inform the public of protective actions consistent with the applicant's classification scheme. If this information is present in the current plan provided with this application, provide an appropriately updated cross-reference that indicates the location of the information.

**Response:**

State Procedure 14, 'Public Information' will be created and will include instructions on drafting of information and draft messages to inform the public of protective actions.

State Procedure 1, Section VII.B.1-2 and Procedure 14, Attachment 2 "Pre-Scripted Messages for the General Public" will be added to E.7 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 007

**Planning Standard:** Subject: Public Education and Information

**Basis:** NUREG 0654, Criterion G.1

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information regarding the dissemination of information to the public concerning notification, protective actions, and special needs populations and indicate by what method the information may be disseminated.

**Response:**

State Procedure 14, 'Public Information' will be created and will include instructions on dissemination of information to the public as indicated below:

Informing the public in advance of how to respond in case of an emergency is primarily the responsibility of the Utility in conjunction with state and local authorities. Annually, the Utility will disseminate information to the public within the 10-mile emergency planning zone (EPZ) regarding how the public will be alerted and what actions should be taken. This is accomplished by the following:

1. Printed materials such as telephone books, posters, and bulletins will include, but are not limited to, the following contents:
  - a. Educational information on radiation
  - b. Respiratory protection
  - c. Sheltering
  - d. Evacuation routes
  - e. Mail-in cards for persons with special needs to ensure extra precautions are taken
  - f. Contacts and telephone numbers for additional information
  - g. Translations of material in additional languages common to the area.

Additionally, Procedure 14, Attachment 3 "Public Notification Requirements for Fixed Nuclear Facilities" will be added to G.1 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 008

**Subject:** Public Education and Information

**Basis:** NUREG 0654, Criterion G.1

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Include a statement that describes who supplies information to the transient populations and the method for distribution of the information in the plan.

**Response:**

State Procedure 14, 'Public Information' will be created and will include instructions related to supplying information to transient populations by stating the following:

Informing the public in advance of how to respond in case of an emergency is primarily the responsibility of the Utility in conjunction with state and local authorities. Annually, the Utility will disseminate information to the public within the 10-mile emergency planning zone (EPZ) regarding how the public will be alerted and what actions should be taken.

Additionally, Procedure 14, Attachment 3 "Public Notification Requirements for Fixed Nuclear Facilities" will be added to G.2 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 009

**Subject:** Emergency Facilities and Equipment

**Basis:** NUREG 0654, Criterion H.10

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Specify frequency of operational checks of instrumentation in plans and/or implementing procedures or provide appropriate cross-reference location. Identify reserve equipment that will be used to supplement equipment that is out of calibration.

**Response:**

Revisions to State Procedure 10 Section VIII.C.4 will include the added text as indicated below. This shaded text will be added following the paragraph in Section VIII.C.4.

DSHS maintains an inventory of instruments which are calibrated annually or as recommended by supplier. These instruments are made available to ERT members during an emergency response. No team member is issued an instrument that is out of calibration.

Additionally, Procedure 10, Section VIII.C.4 will be added to H.10 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 010

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.9

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a statement of the method by which PARs will be provided to local decision makers. Clarify the organization that is responsible for decision making for the ingestion exposure pathway.

MC Describe the process and timeframe for making initial PADs.

**Response:**

State Plan Annex D, Section IV.A.3-4; Annex D, Section IV.F.1.(2); and Procedure 2, Section IV.A.3 will be added to J.9 of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

The sections listed above describe the method by which PARs will be provided to local decision makers and clarifies which state organizations are responsible for decision making for the ingestion exposure pathway.

Matagorda County Procedure 14 'Protective Action Guidelines' Attachment 1 'Plume Exposure Pathway Protective Action Worksheet' describes the process and timeframe for making initial PADs.

Additionally, Procedure 14 will be added to J.9 of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of this RAI response.

Upon revision of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654' the COLA will be updated.

**EMERGENCY MANAGEMENT PLAN**  
**FOR**  
**MATAGORDA COUNTY, BAY CITY, AND PALACIOS**  
**ANNEX W - TAB 10**  
**NUREG-0654 CROSS REFERENCE**

EMERGENCY MANAGEMENT PLAN  
FOR  
MATAGORDA COUNTY, BAY CITY, AND PALACIOS

ANNEX W – TAB 10  
NUREG-0654 CROSS REFERENCE

<b>NUREG-0654 CRITERIA SECTION II</b>	<b>EMERGENCY MANAGEMENT PLAN REFERENCE</b>
A.1.a	Basic Plan Section V Annex W Section III Annex W Section V
A.1.b	Basic Plan Section IV Basic Plan Section V Annex W Section IV Annex W Section V Annex W Tab 1 Section IV Annex W Tab 2 Section IV Annex W Tab 3 Section III Annex W Tab 4 Section III Annex W Tab 5 Section III Annex W Tab 6 Section III Annex W Tab 7 Section IV Annex W Tab 8 Section III Annex W Tab 9 Section IV
A.1.c	Basic Plan Attachments 11, 12, 13, 14, 15, and 16
A.1.d	Basic Plan Section IV.A and B Basic Plan Section V.A Annex W Section V
A.1.e	Basic Plan Section V Basic Plan Section V.B.2.a Annex W Section IV Annex W Section V Annex W Tab 2 Section I.A
A.2.a	Basic Plan Section V Basic Plan Attachments 12, 14, 16 Annex W Section V
A.2.b	Basic Plan Section I
A.3	Basic Plan Attachment 3 Basic Plan Attachment 4 Basic Plan Attachment 5 Basic Plan Attachment 6 Basic Plan Attachment 7 Basic Plan Attachment 8 Basic Plan Attachment 9 Basic Plan Attachment 11 Basic Plan Attachment 12

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ANNEX W – TAB 10  
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NUREG-0654 CRITERIA SECTION II	EMERGENCY MANAGEMENT PLAN REFERENCE
	Basic Plan Attachment 14 Basic Plan Attachment 15 Basic Plan Attachment 16 Basic Plan Attachment 17 Basic Plan Attachment 18
A.4	Basic Plan Section IV.D Basic Plan Section V Annex W Section IV Annex W Tab 2 Section I
B.	N/A
C.1.a	N/A
C.1.b	N/A
C.1.c	Basic Plan Section III.A Annex W Tab 2 Section III
C.2.a	Annex W Tab 9 Section VIII.A.3
C.2.b	N/A
C.3	N/A
C.4	Basic Plan Section VIII provides for use of County resources Basic Plan Section V Basic Plan Attachment 22
D.1	N/A
D.2	N/A
D.3	Annex W Section VI
D.4	Basic Plan Section V.B (Each Department is tasked to develop procedures) Annex W IX.I Annex W REP Procedures
E.1	Basic Plan Section VI Annex W Section V.B Annex W Tab 1 Section IV
E.2	Annex W Tab 1 Section IV Annex W REP Procedures
E.3	N/A
E.4	N/A
E.5	Annex W Section V.C Annex W Tab 1 Section IV.E Annex W Tab 5 All
E.6	Basic Plan Section V.B.2

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ANNEX W – TAB 10  
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<b>NUREG-0654 CRITERIA SECTION II</b>	<b>EMERGENCY MANAGEMENT PLAN REFERENCE</b>
	Annex W Section V.C Annex W Tab 1 Section III
E.7	Basic Plan Section V.B.9 Annex W Section V.D Annex W Tab 5 All Annex W REP Procedures (63)
F.1.a	Basic Plan Section V.B Annex W Section V.B Annex W Section V.C.1 Annex W Tab 1 Section IV.E and F Annex W Tab 2 Section I and II
F.1.b	Annex W Tab 2 Section IV
F.1.c	Annex W Tab 2 Section IV Deferred to State, the county does not contact Federal Agencies directly
F.1.d	Basic Plan Section V.B.2 Annex W Section V.B Annex W Tab 2 Section IV.A and D
F.1.e	Basic Plan Section V.B.2 Basic Plan Section VI Annex W Tab 2 Section IV
F.1.f	N/A
F.2	Basic Plan Section V.B.2 Annex W Section V.B Annex W Tab 2 Section IV.GH
F.3	Annex W Section V.B.4 Annex W Tab 2 Sections IV.IJ and JK
G.1	Basic Plan Section V.B.9 Annex W Section V.D
G.2	Basic Plan Section V.B.9 Annex W Section V.D
G.3.a	Basic Plan Section V.B.9 Annex W Section V.D Annex W Tab 5 Section III.B
G.3.b	N/A
G.4.a	Basic Plan Section V.B.9 Annex W Section V.D Annex W Tab 5 Sections III.B

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ANNEX W – TAB 10  
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NUREG-0654 CRITERIA SECTION II	EMERGENCY MANAGEMENT PLAN REFERENCE
G.4.b	Basic Plan Section V.B.9 Annex W Section V.D
G.4.c	Basic Plan Section V.B.9 Annex W Section V.D Annex W Tab 5 Section III.C
G.5	Annex W Section V.D
H.1	N/A
H.2	N/A
H.3	Basic Plan Section IV.C Annex W Section III.11 Annex W Section IV.B Annex W Tab 9 All
H.4	Basic Plan Section IV.C Annex W Section VI Annex W Tab I Section IV <u>Procedure 13 and 20</u>
H.5	N/A
H.6	N/A
H.7	Annex W Section V.E (Field monitoring deferred to State)
H.8	N/A
H.9	N/A
H.10	Basic Plan Section V.B.4 Annex W Section V.M Annex W Section V.M Figure 3 Annex W Tab 4 Section IV.B
H.11	Annex W Section V.M Figure 3 Annex W, REP Procedures <u>Procedure 42</u> <u>STP Procedure 0PGP05-ZV-0012</u>
H.12	Annex W Section V.E (Deferred to State)
I.1	N/A
I.2	N/A
I.3	N/A
I.4	N/A
I.5	N/A
I.6	N/A

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ANNEX W – TAB 10  
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NUREG-0654 CRITERIA SECTION II	EMERGENCY MANAGEMENT PLAN REFERENCE
I.7	Annex W Section V.E (Deferred to State)
I.8	Annex W Section V.E (Deferred to State)
I.9	N/A
I.10	N/A
I.11	N/A
J.1	N/A
J.2	Basic Plan Section V.B.7 (Evacuation of onsite personnel is the responsibility of STPEGS) Annex W Section V.A Annex W Section V.I Annex W Section V.K Annex W Tab 3 Section III.B.3 Annex W Tab 8 Section III.C
J.3	N/A
J.4	N/A
J.5	N/A
J.6	N/A
J.7	N/A
J.8	N/A
J.9	Annex W Section V.A Annex W Section V.D Annex W Section V.E Annex W Section V.L Annex W Section V.U Annex W Tab 4 All <u>Procedure 14</u>
J.10.a	Annex W Figure 1 Annex W Section V.E <u>Annex W Section V.P.1</u> Annex W Tab 3 Figures 1, 2, and 3 <u>Procedure 11</u>
J.10.b	Annex W Tab 3 Figure 3 <u>Procedure 21</u>
J.10.c	Annex W Tab 1 Section III Annex W Tab 1 Figure 1

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ANNEX W – TAB 10  
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<b>NUREG-0654 CRITERIA SECTION II</b>	<b>EMERGENCY MANAGEMENT PLAN REFERENCE</b>
J.10.d	Annex W Section V.D.13 Annex W Tab 7 Section IV.C and D Annex W Tab 8 Section III.B Procedures 40, 50 and 70
J.10.e	Annex W Section V.M.2 (Deferred to State) Procedures 41 and 42 STP Procedure 0PGP05-ZV-0012
J.10.f	Annex W Section V.M.2 (Deferred to State)
J.10.g	Annex W Section V.K Annex W Tab 8 Section III Annex W Tab 3 Figures 5 and 6
J.10.h	Annex W Tab 7 Figures 1 and 2
J.10.i	Annex W Tab 3 Section III.C Annex W Tab 3 Section III.F
J.10.j	Basic Plan Section V.B.7 Annex W Section V.I Annex W Tab 3 Section III.C
J.10.k	Annex W Tab 3 III.C.6
J.10.l	Annex W Tab 3 Section III.C Annex W Tab 3 Section III.F Annex W Tab 3 Figure 2
J.10.m	N/A
J.11	N/A
J.12	Annex W Tab 3 Section III.D and III.E Annex W Tab 7 Section IV.B
K.1	N/A
K.2	N/A
K.3.a	Annex W Section V.M (Deferred to State) STP Procedure 0PGP05-ZV-0012 Procedures 41 and 42
K.3.b	Annex W Section V.M (Deferred to State)
K.4	Annex W Section V.A.9 Annex W Section V.M
K.5.a	Annex W Tab 3 Section III.B and III.E

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ANNEX W – TAB 10  
NUREG-0654 CROSS REFERENCE

NUREG-0654 CRITERIA SECTION II	EMERGENCY MANAGEMENT PLAN REFERENCE
K.5.b	Annex W Section V.J Annex W Section V.M Annex W Tab 3 Section III.D Annex W Tab 7 Section IV.B.3 <del>Procedure 72</del>
K.6	N/A
K.7	N/A
L.1	Basic Plan Section V.B.8 Annex W Section V.J
L.2	N/A
L.3	N/A
L.4	Annex W Section V.J.9
M.1	Basic Plan Section VI.C.5 Annex W Section VI.E
M.2	N/A
M.3	N/A
M.4	N/A
N.1.a	Basic Plan Section V.A.2.g Annex W Tab 6 Section III
N.1.b	Annex W Tab 6 Section III
N.2.a	Annex W Tab 6 Section III
N.2.b	N/A
N.2.c	Annex W Tab 6 Section III <del>Matagorda County Hospital Plan and Procedures</del>
N.2.d	Annex W Tab 6 Section III
N.2.e	N/A
N.3.a	Annex W Tab 6 Section III
N.3.b	Annex W Tab 6 Section III
N.3.c	Annex W Tab 6 Section III
N.3.d	Annex W Tab 6 Section III
N.3.e	Annex W Tab 6 Section III
N.3.f	Annex W Tab 6 Section III
N.4	Annex W Tab 6 Section III
N.5	Annex W Tab 6 Section III
O.1	Basic Plan Section V.A.2.g Annex W Section IV.A.5

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ANNEX W – TAB 10  
NUREG-0654 CROSS REFERENCE

NUREG-0654 CRITERIA SECTION II	EMERGENCY MANAGEMENT PLAN REFERENCE
	Annex W Section V.D.10 Annex W Section V.H.7 Annex W Section V.J.7 Annex W Tab 6 Section III
O.1.a	N/A
O.1.b	Basic Plan Section V.A.2.g Annex W Tab 6 Section III
O.2	N/A
O.3	N/A
O.4.a	Annex W Tab 6 Section III.C.3.a
O.4.b	Annex W Section V.E (Deferred to State)
O.4.c	Annex W Section V.E (Deferred to State)
O.4.d	Annex W Tab 6 Section III.C.3.b Annex W Tab 6 C.1 STP Procedure OPGP03-ZT-0139
O.4.e	N/A
O.4.f	Annex W Tab 6 Section III.C.3.c Annex W Tab 6 C.1 STP Procedure OPGP03-ZT-0139
O.4.g	Annex W Tab 6 Section III.C.3.d Annex W Tab 6 C.1 STP Procedure OPGP03-ZT-0139
O.4.h	Annex W Tab 6 Section III.C.3.e Annex W Tab 6 Section III.C.1 STP Procedure OPGP03-ZT-0139
O.4.i	N/A
O.4.j	Annex W Tab 6 Section III.C.3.f STP Procedure OPGP03-ZT-0139
O.5	Annex W Tab 6 Section III.A
P.1	Annex W Section V.A.8 Annex W Tab 6 Section III.C.1
P.2	Basic Plan Section V.A.1 Annex W Section IV.A.1
P.3	Basic Plan Section V.A.2
P.4	Basic Plan Section XI. Annex W Tabs 1-9

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ANNEX W – TAB 10  
NUREG-0654 CROSS REFERENCE

<b>NUREG-0654 CRITERIA SECTION II</b>	<b>EMERGENCY MANAGEMENT PLAN REFERENCE</b>
P.5	Basic Plan Section V.A.2.e
P.6	Basic Plan Section I.C
P.7	Annex W Tab 11
P.8	Basic Plan Table of Contents Annex W Tab 10
P.9	N/A
P.10	Annex W Tab 1 Section IV.F

Note: The basic style of this plan is that the general provisions are in the Basic Plan and the specifics, by topic, are in the respective Annexes and/or Attachments and Tabs.

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**FOR**  
**MATAGORDA COUNTY, BAY CITY AND PALACIOS**  
**ANNEX W - TAB 11**  
**PROCEDURES CROSS REFERENCE**

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
<b><u>Section I: Direction and Control</u></b>	
Procedure 10, Emergency Management Director	Basic Plan Sections: IV.A, B, C.2; V.A.1, B.5, B.10, B.13, B.14; VI.C.2.d, C.2.e, C.3.d, C.3.e, and C.4
	Annex W Sections: IV.A.1, A.3, A.4, B.2; V.A, D.7, D.9, E, G, N, O; VI.A.2, B. 2, C.2, D.2, E.2.b, E.2.c; VII.A; VIII.A, B, D, G; IX.F.2.b, G.1.b, and G.2
	Annex W Tabs: 1, 2, 3, 4, 5, 7, 8, and 9
Procedure 11, Emergency Management Coordinator	Basic Plan Sections: IV.B, C.2; V.A.2, B.5, B.14, B.20; VI.C.1.f.2, C.2.d, C.2.e, C.2.f.20, C.3.d, C.3.e, C.3.f.1; and X
	Annex W Sections: IV.B.2; V.A, B, C, E, P.1; K.4; VI. A.2, B.2; VIII.F.1, F.2; IX.F.2.b, and G.2.c
	Annex W. Tabs: 1, 2, 3, 4, 6, 7, 8, and 9
Procedure 12, EOC Administrative Assistant	Basic Plan Sections: None
	Annex W Sections: None
Procedure 13, Emergency Operations Center Concept of Operation and Activation	Basic Plan Sections: IV.B, C; V.A.2.b, A.2.h, A.2.k, A.2.m, A.2.n, B.14; VI.C.1.f.3, C.1.f.12, C.2.f.8, C.3.f.2, C.3.f.7, and C.3.f.9
	Annex W Sections: III.A.11; IV.B; VI; VIII.B; IX.A.1, B.2, E.1, E.3, F.1.a, F.2.a, F.3, G.1.a; and Figure 4
	Annex W Tabs: 2, 5, 6, 7, 8, and 9
Procedure 14, Protective Action Guides	Basic Plan Sections: V.A.1.c, and B.20
	Annex W Sections: III.B.4; IV.A.9; V.A.6, A.7, D.1.c, D.9; VI.C.2, D.2, E.1, and E.2.a

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
<b><u>Section II: Law Enforcement and Traffic Control</u></b>	
Procedure 20, Sheriff's Office Dispatcher	Basic Plan Sections: IV.C; V.B.1.a, B.1.b, B.7.k; VI.C.1.f.2, C.2.f.2, C.2.f.5, C.2.f.7, and C.3.f.1
	Annex W Sections: Figure 2 A.3.b; V.B.1, B.2, B.5, C.1, C.2; VI.A.2, B.2, C.2, D.2; and IX.B.2
	Annex W Tabs: 1, 2, 3, and 4,
Procedure 21, Communications Officer	Basic Plan Sections: V.B.1.a, B.1.b, B.2, B.7.c, B.7.k, B.18.c; VI.C.1.f.2, C.2.f.2, C.2.f.5, C.2.f.7, C.3.f.1, C.3.f.3, and C.3.f.5
	Annex W Sections: Figure 2 A.3.b, A.3.e, A.3.f, A.3.g; V.B, C, I; VI.A.2, B.2, C.2, D.2; VII.B; and IX.B.2
	Annex W Tabs: 1, 2, 3, and 4
Procedure 22, Warning and Evacuation/Traffic and Access Control	Basic Plan Sections: V.B.5; VI.C.2.f.6, C.2.f.7, C.2.f.10; C.3.f.4, and C.3.f.5
	Annex W Sections: Figure 2 A.2 and 3; V.A.10, A.11, C, I, O; VIII.B; and IX.B
	Annex W Tabs: 1, 3, and 4
Procedure 23, Activation of the Public Warning System	Basic Plan Sections: V.B.1; VI.C.2.f.7, and C.3.f.6
	Annex W Sections: Figure 2 A.3.b; V.C.2, C.4, C.5, and C.6
	Annex W Tabs: 1 and 4

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
<b><u>Section III: Fire and Rescuer</u></b>	
Procedure 30, Fire Services Coordinator	Basic Plan Sections: V.B.6, B.16, B.17; and VI.C.3.f.4
	Annex W Sections: III.A.14, B.15; Figure 2 I; V.H; and VIII.A
	Annex W Tabs: 1, 2, and 3
<b><u>Section IV: Health and Medical Services</u></b>	
Procedure 40, Hospital District Administrator	Basic Plan Sections: V.B.8.a, b.8.c; and VI.C.3.f.4
	Annex W Sections: III.A.6.b; Figure 2 B; V.D; F, J; VIII.C; and IX.C
	Annex W Tabs: 2, 7, and 8
Procedure 41, Environmental Health Director	Basic Plan Sections: V.B.4, B.8.b; and VI.C.3.f.4
	Annex W Sections: III.A.4, B.3; V.A., E, L, M; and VI.E.2.e
Procedure 40, Hospital District Administrator	Basic Plan Sections: V.B.8.a, b.8.c; and VI.C.3.f.4
	Annex W Sections: III.A.6.b; Figure 2 B; V.D; F, J; VIII.C; and IX.C
	Annex W Tabs: 2, 7, and 8
Procedure 41, Environmental Health Director	Basic Plan Sections: V.B.4, B.8.b; and VI.C.3.f.4
	Annex W Sections: III.A.4, B.3; V.A., E, L, M; and VI.E.2.e
	Annex W Tabs: 2, 3, 4, and 7

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
Procedure 42, Exposure Control for Emergency Workers	Basic Plan Sections: V.B.8.4
	Annex W Sections: III.A.4, B.3; V.A.9, <u>D.13</u> ; and M
	Annex W Tabs: 4
<b><u>Section V: Transportation</u></b>	
Procedure 50, Transportation Officer	Basic Plan Sections: V.B.18; and VI.C.3.f.4
	Annex W Sections: III.A.12; V.A.10, <u>D.13</u> , K; and IX.B.1
	Annex W Tabs: 1, 2, 3, <u>7</u> , and 8
<b><u>Section VI: Public Information</u></b>	
Procedure 60, Public Information Officer	Basic Plan Sections: III.A; V.B.1.c, and B.9
	Annex W Sections: V.B.2, B.3, B.4, B.5, D; and VI.E.2.d
	Annex W Tabs: 1, 2, 3, 4, and 5
Procedure 61, KMKS, Radio Operations	Basic Plan Sections: III.A; and VI.C.3.f.6
	Annex W Sections: V.B.5
	Annex W Tabs: 1, 2, and 5
Procedure 62, KIOX, Radio Operations	Basic Plan Sections: III.A
	Annex W Sections V.B.5
	Annex W Tabs: 1, 2, and 5

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
Procedure 63, Emergency Alert System Messages and News Advisories	Basic Plan Sections: V.B.1.c
	Annex W Sections: V.B.5
	Annex W Tabs 1, 2, and 5
Procedure 64, KXGJ, Radio Operations	Basic Plan Sections V.B.1.c
	Annex W Sections V.B.5
	Annex W Tabs: 1, 2, and 5
<b><u>Section VII: Reception Centers</u></b>	
Procedure 70, American Red Cross Director	Basic Plan Sections: V.B.3, B.15; and VI.c.3.f.8
	Annex W Sections: III.B.12; Figure 2 G; and V.D.13, P
	Annex W Tabs: 1, 2, 3, 4, and 7, and 8
Procedure 71, Reception Center Operations (American Red Cross)	Basic Plan Sections: V.B.3; and VI.C.3.f.8
	Annex W Sections: Figure 2 G; and V.P
	Annex W Tabs: 1, 2, 3, 4, and 7
Procedure 72, Reception Center Operations (Environmental Health Department)	Basic Plan Sections: V.B.3; and VI.C.3.f.8
	Annex W Sections: Figure 2 G; and V.J, M, P
	Annex W Tabs: 1, 2, 3, 4, and 7

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ANNEX W – TAB 11  
PROCEDURES CROSS REFERENCE

<u>Annex W Procedure</u>	<u>Basic Plan and Annex W</u>
<b><u>VIII: Facility Maintenance</u></b>	
STP Procedure OPGP05-ZV-0012, 'Emergency Facilities Inventory'	Basic Plan Sections: V.B.8.4
	Annex W Sections: III.A.4, B.3; V.A.8, 9, and M
	Annex W Tabs: 4 and 6

FEMA RAI STP 011

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.e

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Identify a specific quantity of KI as well as a method and location for storage and distribution of KI. The process for notification of counties regarding the decision to authorize the use of KI for emergency workers and institutionalized individuals should be clearly stated in the plan. Include a trigger point for issuing authorization of KI for the institutionalized and other members of the public who cannot be evacuated. This trigger point should be consistent with current federal guidance for members of the public.

Matagorda County Basic Emergency Management Plan (MCBEMP), Annex W: Identify a specific quantity of KI necessary to supply the county emergency workers as well as a method and location for storage and distribution of KI. Indicate the means by which the county receives notification from the state.

**Response:**

Revisions to State Procedure 9, Section VII.A will be made to include specific quantity and location for storage of KI. The following text will be added to the first paragraph in Procedure 9, Section VII.A as indicated below:

100 packs (fourteen 130mg tablets per pack) of potassium iodide are provided by the utilities and stored at the DSHS RCP Headquarters in Austin, Texas.

Additionally, Procedure 9, Section VII.A will be added to J.10.e of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 001.

Procedure 9, Section V.II.B.1 will also be revised to describe the State and local decision process that is used to recommend KI and address provisional issues for the use of radioprotective drugs. The text in Procedure 9, Section VII.B.1 will be revised as indicated below:

B. Recommendations for Use

1. The use of potassium iodide may be recommended any time there is an accident or incident that poses a potential for inhalation or ingestion of radioactive iodine and at a minimum it must be recommended when projected dose to the thyroid equals or exceeds 25 rads. Dose projections may be based on the calculations of the DSHS Accident Assessment team, the assessment team of the involved nuclear power generating facility-

operating utility, or the assessment team of a competent federal agency.  
See Attachment 1 to Procedure 1 for recommendations for use of KI.

Revisions to State Procedure 1, Attachment 1 will include current federal guidance. The marked up text changes to Procedure 1, Attachment 1 will be revised as indicated below:

### PROTECTIVE ACTION GUIDELINES FOR MEMBERS OF THE GENERAL PUBLIC

Protective Action	Projected Dose (PAG)	Comments
Evacuation <sup>a</sup>	1-5 rem <sup>b</sup>	Evacuation (or, for some situations, sheltering <sup>a</sup> ) should normally be initiated at 1 rem.
Administration of stable iodine	25 rem <sup>c</sup>	<del>Emergency Workers over 40 yrs.</del>
<del>Administration of stable iodine</del>	<del>10 rem<sup>c</sup></del>	<del>Emergency workers between 18-40 yrs.</del>
<del>Administration of stable iodine</del>	<del>5 rem<sup>c</sup></del>	KI will not be recommended for members of the general population. However, it may be considered for members of special population groups such as persons in hospitals, nursing homes who cannot be moved for medical reasons; or for persons who are in jails, prisons, or other institutions who cannot be relocated for reasons of safety.
<p><sup>a</sup>Sheltering may be the preferred protective action for local decision makers if it will provide protection equal to or greater than evacuation, based upon consideration of factors such as weather conditions, competing disasters, physical factors that impede evacuation, etc.</p> <p><sup>b</sup>The sum of the deep dose equivalent (DDE) resulting from exposure to external sources and the committed effective dose equivalent (CEDE) incurred from all significant inhalation pathways during the early phase. Committed dose equivalents (CDE) to the thyroid and to the skin may be 5 to 50 times larger, respectively.</p> <p><sup>c</sup>Committed dose equivalent to the thyroid from radioiodine.</p>		

Matagorda County's inventory of KI is maintained by STPNOC and in accordance with STP Procedure 0PGP05-ZV-0012 'Emergency Facility Inventories' Form 13 'Matagorda County Sheriff's Office Inventory (E06)'. The inventory form is provided below with the KI inventory criteria highlighted.

Matagorda County Procedure 41 'Environmental Health Director' and Procedure 42 'Exposure Control for Emergency Workers' provides the information on the means by which the county receives notification and guidance from the State on exposure control.

Additionally, Procedure 0PGP05-ZV-0012 'Emergency Facility Inventories' and County Procedures 41 and 42 will be added to J.10.e of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

No additional COLA revisions are required as a result of this RAI response.



FEMA RAI STP 012

**Subject:** Radiological Emergency Response Training

**Basis:** NUREG 0654, Criterion O.4.d, O.4.f, O.4.g, O.4.h, O.4.j

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information in the plan that will address the scope, nature, and frequency of training for the applicable elements of Planning Standard O.4. Provide more specific references with regard to the response specific training that is in accordance with referenced NRP guidelines.

MCBEMP, Annex W Include appropriate sections of the plan that address the scope, nature, and frequency of training in the plan cross-reference.

**Response:**

Revisions to Tab 1, Attachment 4 will include information related the scope, nature, and frequency of training for the applicable elements of Planning Standard O.4. The following text will be added to Tab 1, Attachment 4 Section I.F.1-5 as indicated below:

The specialized initial training and periodic training/retraining programs (including the scope, nature, and frequency) for the following local first responder categories are addressed in local emergency management plans:

1. Police, Security, and fire-fighting personnel
2. First aid and rescue personnel
3. Local support services personnel, including Civil Defense/Emergency Service personnel
4. Medical support personnel
5. personnel responsible for transmission of emergency information and instructions

County emergency management plans recommend these local first responders and emergency workers to participate in annual training and periodic drills and exercises with the State and/or the Utility in their jurisdiction.

Additionally, Tab 1, Attachment 4 Section I.F.1-5 will be added to O.4 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County's training is provided by STPNOC and in accordance with STP Procedure 0PGP03-ZT-0139 'Emergency Preparedness Training Program' Step 4.9.

Matagorda County Annex W Tab 6 will be revised to address training provided by STP in accordance with STP Procedure 0PGP03-ZT-0139 'Emergency Preparedness Training Program.' The text in Annex W Tab 6 C.1 will be revised as indicated below:

C. Training Program

1. The responsibility for coordination of the development and presentation of the training program rests with the Emergency Management Coordinator. Emergency response training not available through county, State, and Federal resources are provided by STP, in accordance with 0PGP03-ZT-0139 'Emergency Preparedness Training Program.'

Additionally, Procedure 0PGP03-ZT-0139 'Emergency Preparedness Training Program' and Annex W Tab 6 C.1 will be added to O.4.d, O.4.f, O.4.g, O.4.h and O.4.j of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the State Annex D Tab 1, Attachment 4 Section I.F.1-5 and Matagorda County Annex W Tab 6 the COLA will be updated.

FEMA RAI STP 013

**Subject:** Emergency Communications

**Basis:** NUREG 0654, Criterion F.1.d

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide clear descriptions of the provisions for communication with the applicant. Update the plan cross-reference to remove references to Section V of Procedure 13 and include other references which may be applicable.

MCBEMP, Annex W: Provide a clear description of the communication system that will be used by the county to communicate with the EOF.

**Response:**

Procedure 13, Section V will be removed from F.1.d of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

Annex D, Tab 1, Chapter 2, Section VII.C.1 will be added to F.1.d of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' which states the following:

*The Chief of Field Operations (Incident Commander), a designated senior manager deployed from Austin, will direct the RCP response activities performed on-scene and will coordinate with State Emergency Management Council and STP on all protective action recommendations made to the local jurisdictions.*

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County Annex W Tab 2 will be revised to include a description of the communication system that will be used by the county to communicate with the STP Emergency Operations Facility. The text in Annex W Tab 2 Section IV will be revised as indicated below:

A. Intra-county Communications

1. Telephone services interconnect the county and cities with other offices in the county including the Matagorda County Emergency Operations Center.
2. Radio communications with field personnel is a daily service in the following departments:
  - a) Matagorda County Sheriff's Office
  - b) Matagorda County Commissioners

- c) Hospitals and Ambulances
- d) Volunteer Fire Departments

3. The commercial telephone system is the primary communication system between the Matagorda County EOC and STP Emergency Operations Facility (EOF). Additional communication links with the EOF include a Ringdown line and satellite telephone.

Upon revision of the Matagorda County Annex W Tab 2 Section IV the COLA will be updated.

FEMA RAI STP 014

**Subject:** Emergency Communications

**Basis:** NUREG 0654, Criterion F.1.e

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Indicate in the plan cross-reference the portions of the plan that address primary and back-up methods for alerting and activating emergency personnel.

**Response:**

Revisions to Procedure 13, Section IV.D.(c) will be made to identify primary and secondary methods for alerting and activating emergency personnel. The text changes to Procedure 13, Section IV.D.(c) will be as indicated below:

- (c) The Staging Area Coordinator (Logistics Section Chief) will initiate the notification of personnel as directed by the emergency planners. Primary means of notification will be contact by telephone. The TXPHIN website can be used as a secondary means to support the quick notification of personnel with an email and phone message with specific instructions for managers and/or all Emergency Response Team personnel.

Additionally, Procedure 13, Section IV.D.(c) will be added to F.1.e of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 015**Subject:** Emergency Communications**Basis:** NUREG 0654, Criterion F.2**SRP Acceptance Criterion:** Requirement H**RAI Description:**

TEMP, Annex D: Provide reference to primary and back-up communication methods with medical support facilities.

MCBEMP, Annex W: Provide updates to the county plan with corrected lettering in referenced section of the plan and update the cross-reference accordingly.

**Response:**

Revisions to State Procedure 13, Attachment 3 will be made to include primary and back-up communication methods with medical support facilities. The following will be added to the South Texas Project (STP) Quick Reference Phone List in Procedure 13.

<b>Matagorda County General Hospital</b>	(979) 245-6383
	ER (979) 241-6615
<b>Palacios Community Medical Center</b>	(361) 972-2511
	FAX (361) 972-0149

**\*\*\*Refer to STP Emergency Communications Directory for a more comprehensive list of numbers.**

Additionally, State Procedure 13, Attachment 3 will be added to F.2 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County Annex W Tab 2 Section IV will be revised to correct the editorial formatting issue with repeating the letter "F". The second formatted "F" will be replaced with "G" and subsequent lettering will be changed appropriately to maintain the alpha sequencing throughout the remainder of the Section.

As a result of these editorial format changes appropriate changes will be made to F.2 of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the Matagorda County Annex W Tab 2 Section IV the COLA will be updated.

FEMA RAI STP 016

**Subject:** Radiological Exposure Control

**Basis:** NUREG 0654, Criterion K.3.a

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information in plans or procedures that indicate quantities and storage locations for dosimetry (both permanent record and self-reading).

MCBEMP, Annex W: Identify a reference to state guidelines that specify frequencies at which dosimeters will be read. Provide details regarding the quantities of dosimetry that should be maintained and locations where dosimeters will be stored (both permanent record and self-reading).

**Response:**

Revisions to State Procedure 7, Section II will be made to include quantities and storage locations of dosimetry. The following text will be added to Procedure 7, Section II, following the first paragraph as indicated below:

DSHS has sufficient quantities of dosimetry to support 24-hour emergency response operations. Emergency Planners maintain 200 CDV-138's, 200 CDV 742's, and 45 electronic dosimeters and store them at the Exchange Building, 8407 Wall Street, in Austin Texas. Quantities and storage location of dosimetry are annually reported to FEMA in an Annual Letter of Certification.

Additionally, State Procedure 7, Section II will be added to K.3.a of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County's inventory of dosimetry is maintained by STPNOC and in accordance with STP Procedure 0PGP05-ZV-0012 'Emergency Facility Inventories' Form 13 'Matagorda County Sheriff's Office Inventory (E06)'. The inventory form is provided below with the dosimetry inventory criteria highlighted.

Matagorda County Procedure 41 'Environmental Health Director' and Procedure 42 'Exposure Control for Emergency Workers' provides specify frequencies at which dosimeters will be read.

Additionally, Procedure 0PGP05-ZV-0012 'Emergency Facility Inventories' and County Procedures 41 and 42 will be added to K.3.a of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.' A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.



FEMA RAI STP 017

**Subject:** Radiological Exposure Control

**Basis:** NUREG 0654, Criterion K.3.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide specific requirements on specific time intervals in which dosimeters must be read.

MCBEMP, Annex W: Indicate the location of the specific state guidance that the county will use for reading and recording dosimeters.

**Response:**

Revisions to State Procedures 7 Section, 10, 24 and 25 will be made to indicate specific time intervals in which dosimeters must be read, stating that "RCP response team members will check self-reading dosimetry approximately every 30 minutes or as instructed by the Field Team Leader (Operations Section Chief)". The marked up text changes to Procedures 7, 10, 24, and 25 will be:

State Procedure 7, Section VII.D.2

2. RCP response team members will periodically check their self-reading dosimeters dosimetry approximately every 30 minutes or as instructed by the Field Team Leader (Operations Section Chief) and enter the results in their activity log.

State Procedure 10, Section VIII.F.3

3. Individual whole body exposure shall be monitored by periodically checking dosimetry approximately every 30 minutes or as instructed by the Field Team Leader (Operations Section Chief).

State Procedure 24, Section VI

- I. RCP response team members will periodically check dosimeters self-reading dosimetry approximately every 30 minutes or as instructed by the Field Team Leader (Operations Section Chief) and enter the results in their activity logs.

State Procedure 25, Section V.H

- H. RCP response team members will periodically check self-reading dosimetry approximately every 30 minutes or as instructed by the Field Team Leader (Operations Section Chief) and enter the results in their activity logs.

Matagorda County Procedure 42 'Exposure Control for Emergency Workers' describes the process and timeframe used for reading and recording dosimeters.

No COLA revision is required as a result of this RAI response.

FEMA RAI STP 020

**Subject:** Medical and Public Health Support

**Basis:** NUREG 0654, Criterion L.4

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide references to the plans or procedures which describe the provisions for transporting radiologically contaminated injured individuals.

**Response:**

Tab 1, Chapter 2, Section III.A.3 will be added to L.4 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' which states the following:

*The offsite response organization responsible for transportation of contaminated injured patients is Matagorda County Emergency Medical Services.*

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 022

**Subject:** Exercises and Drills

**Basis:** NUREG 0654, Criteria N.3.c, N.3.d, N.3.e, N.3.f

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a statement in the plan that indicates that simulated events, exercise timelines, and narrative summaries will be addressed in the scenario developed for exercises and drills. In addition, provide a statement that advanced materials will be provided to official observers.

**Response:**

Revisions to Tab 1, Attachment 4, Section IV-Scenarios will include the statements that indicate simulated events, exercise timelines, and narrative summaries will be addressed in the scenario developed for exercises and drills. Additionally, a statement that advanced materials will be provided to official observers will be included. Tab 1, Attachment 4 Section IV.4-7 will be revised as indicated below:

4. The simulated events

5. A time schedule (time-line) of real and simulated initiating events.

6. A narrative summary describing the conduct of the exercise or drill to include such things as simulated casualties, fire department(s) participation, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities.

7. A description of the arrangements for advance materials to be provided to official observers.

Additionally, Tab 1, Attachment 4, Section IV.4-7 will be added to N.3.c of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 024

**Subject:** Public Education and Information  
**Basis:** NUREG 0654, Criterion G.4.c  
**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide an update to the cross-reference to include the section of the plan that indicates what organization is responsible for answering public inquiries and the method for contacting that organization.

**Response:**

State Procedure 14, 'Public Information' will be created and will include public inquiry information responsibilities and communication methods.

Revisions to Procedure 13, Attachment 3 will be made to include a public inquiry contact number. The Procedure 13, Attachment 3 text will be revised as indicated below:

**Public Information @ JIC: Rumor Control (979) 244-5318**

Additionally, Procedure 14-Attachment 1, Procedure 13-Attachment 3, and Annex I, Section IV.C.1-3 will be added to G.4.c of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 025

**Subject:** Public Education and Information

**Basis:** NUREG 0654, Criterion G.5

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information describing the State's participation in providing training to the media on emergency plans, radiation, and points of contact for emergency public information.

**Response:**

Revisions to Annex D, Tab 1, Section VII.A.14 will be made to identify the utility criteria for acquainting media and public with emergency plans, information concerning radiation, and points of contact. The Annex D, Tab 1, Section VII.A.14 text will be added as indicated below:

14. Provide a coordinated program for federal, state, local and utility representatives to acquaint news media and the general public with emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

Additionally, Annex D, Tab 1, Section VII.A.14 will be added to G.5 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D, Tab 1, Section VII.A.14 the COLA will be updated.

FEMA RAI STP 027

**Subject:** Accident Assessment

**Basis:** NUREG 0654, Criterion I.11

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information that clearly states if the state will take peak plume measurements or will rely on the applicant or federal resources to get these measurements. Any written agreements that are in place with regard to taking these measurements should also be provided.

**Response:**

Revisions to State Procedure 10, Section IX.D.1.c will be made to indicate who will take peak plume measurements. Procedure 10, Section IX.D.1.c text will be added as indicated below:

c. Centerline measurements will be taken by the utility.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 028

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.a

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide maps that identify locations of reception centers and shelters and specify the frequency at which all maps included in the plan are to be updated.

**Response:**

Matagorda County Annex W will be revised to provide information that identifies locations of reception center and shelter maps and specify the frequency at which all maps included in the plan are to be updated. The text in Annex W Section V.P.1 will be revised as indicated below:

- P. Reception Centers and American Red Cross Director Congregate Care Facilities
  - 1. Plan and direct Reception Centers and Congregate Care Facilities occupancy, including preparation for radiological emergencies, and providing appropriate living space for each registered person. Maintain and update Reception Center and Shelter maps filed in the Emergency Operations Center annually.

Procedure 11 states the Emergency Management Coordinator is responsible for the preparation of procedures for the Emergency Operations Center (EOC) as well as maintenance of other applicable procedures, charts, rosters, maps, and supplies necessary for the operation of the EOC, including documents such as the emergency call out list, which is updated quarterly.

Additionally, Annex W Section V.P.1 and Procedure 11 Step 2.4 will be added to J.10.a of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the Matagorda County Annex W Tab 2 Section IV the COLA will be updated.

FEMA RAI STP 029

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a map from current census data that identifies special populations such as day care facilities and schools.

MCBEMP, Annex W: Update cross reference to include references to maps that identify special populations.

**Response:**

Revisions to Annex D Tab 1, Chapter 2, Attachment 4 "Population EPZ Map" will be made to indicate that there are no day care facilities, hospitals or jails within the 10-mile EPZ. The following note will be added to, Chapter 2, Attachment 4.

**Note: There are no day care facilities, schools, hospitals or jails within the 10-mile EPZ**

Matagorda County Procedure 21 'Communications Officer' includes a special facilities, recreational areas and industrial locations map.

Procedure 21 will be added to J.10.b of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the State Annex D Tab 1, Chapter 2, Attachment 4 the COLA will be updated.

FEMA RAI STP 030

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: This RAI is identical to those provided for standards E.6 and E.7. Provide information that establishes administrative and physical means and the time required to notify and provide prompt instruction to the public within the plume exposure pathway EPZ. Also, Provide details related to the drafting of information or provide draft messages that would inform the public of protective actions consistent with the applicant's classification scheme. If this information is present in the current plan provided with this application, provide an appropriately updated cross-reference that indicates the location of the information.

**Response:**

State Procedure 14, 'Public Information' will be created and will include instructions on drafting information and draft messages to inform the public of protective actions. The following text will be included in Procedure 14, Attachment 1 as indicated below:

The DSHS JIC PIO will:

- Develop understandable, complete, and accurate news releases.
- Obtain approval for news releases and/or information bullets from the RCP Chief of Field Operations (Incident Commander) and the DSHS MACC PIO (if activated) or the DSHS Press Officer or designee prior to the release of news to the public. The RCP Chief of Field Operation (Incident Commander) may be designated by the DSHS Press Officer to authorize all media releases in the event of a radiological incident.
- Release the approved news release to the public and other state response centers.
- Provide news releases and bulletins. These include providing the public with information on recommended protective actions during the onset of an actual or potential release of radioactive material. All news releases are a priority.

The DSHS RCP Technical Spokesperson will:

- Provide relevant, accurate, and timely information to the news media and public.
- Answer each question with professionalism. (If you do not know the answer, tell the media you will have the answer as soon as possible).

- Focus on protecting the health and safety of the public and returning the situation back to normal as soon as possible
- Provide understandable information- avoid acronyms and technical language.

Additionally, Annex A, Section IV.C.2, Procedure 1, Section VII.B.1-2, and Procedure 14, Attachment 2 will be added to J.10.c of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.' These sections (with exception to Procedure 14) state the following:

Annex A, Section IV.C.2

*Local EAS activation will be the responsibility of the affected political jurisdiction, either a city or a county. However, if the threatened area includes several political subdivisions, or if insufficient time is available for local involvement, the DPS Area Warning Center may activate the EAS system simultaneously with or immediately after notification of Local Warning Points. Procedures for activation of appropriate EAS broadcast areas are maintained at each EAS DPS Area Warning Center.*

Procedure 1, Section VII.B.1-2

*1. Protective Action Guidance*

*With modifications, the RCP adopted the protective action guides for airborne releases that are recommended by the Environmental Protection Agency in EPA 400-R-92-001, Manual of Protective Action Guides and Protective Actions for Nuclear Incidents.*

*Protective action guidelines for members of the general public are listed in Attachment 1.*

*Types of protective actions and their initiation times are summarized in Attachment 2.*

*Guidance on dose limits for state emergency workers is described in Attachment 3. In addition to EPA guidance, this attachment incorporates state guidelines for both shift and daily exposure limitations. Guidance on dose limits for workers performing emergency services is contained in Attachment 4.*

*Similar guidelines concerning protective actions will be used in other types of accidents involving the release of radioactive materials. They should be modified as necessary to account for the release of different nuclides. In addition, public alerting and notification will be vastly different, as the risk population and affected geographic area will be much smaller.*

*2. Protective Response Recommendation Options*

*At the time of an accident, several protective response options may exist. Specific protective actions or a combination of actions may be recommended for areas within the plume exposure pathway EPZ depending on the assessment results.*

*Options available include:*

*a. Evacuation*

*Evacuation is a protective action, which may be recommended to both resident and transient population at the Site Area Emergency or General Emergency action level.*

*When an evacuation is recommended, all members of the public will be advised to leave the risk area until it has been determined that all danger has passed. At the time of an accident when PAGs are projected to be exceeded, the same protective actions will be considered for school children as for members of the general public. Consideration will be given to providing an increased level of protection to children during school hours when time and circumstances permit.*

*b. Respiratory Protection*

*Respiratory protection is an action, which may be used in conjunction with one or more of the available options.*

*(1). When respiratory protection is recommended, residents and other persons within a risk area will be advised to cover their nose and mouth with handkerchiefs, cloth, or other materials capable of filtering small particles from their breathing air. In addition, they will be advised to limit outside air intake for heating or cooling systems if they are in an enclosed area.*

*Note: Ad hoc respiratory protection measures such as those described above should be recommended to the responsible local official, in addition to evacuation, when it is anticipated that members of the general public will be exposed to an airborne radioactive plume. Persons who are institutionalized, or are otherwise unable to leave the affected area should also follow these recommendations.*

*c. Access Control*

*Access control may be used as a separate action or in conjunction with other actions such as evacuation, and may be used at either the Site Area Emergency or General Emergency level. When access control is implemented, access to the risk area is restricted, thus limiting the number of persons who could potentially be exposed.*

*Local government is responsible to control access to areas that may be a threat to the public health and safety of its residents. The County Judge or Mayor of the jurisdiction may permit entries for good cause into the area. The RCP will assign members of its Contamination Control Team to designated access control locations to assist with monitoring, and make recommendations regarding entry to local government personnel at those locations.*

*d. Potassium Iodide (KI)*

*Potassium Iodide is a substance, which tends to saturate the thyroid, thus reducing the uptake of the radioactive iodine nuclides, which could be released during an accident.*

*The State of Texas will consider recommending the use of potassium iodide for emergency workers within the plume exposure pathway during accidents involving releases of radioiodine. Potassium iodide would not be effective, and will not be recommended unless radioiodine is involved. The Commissioner of Health or his designee will make this recommendation. Attachment 1 to this Procedure and Procedure 9 addresses Potassium Iodide and recommendations in further detail.*

e. *Limitation of Exposure Duration*

*Limitation of exposure duration in an identified risk area is a protective action that will be considered for emergency workers. This will be done in order to prevent workers from exceeding their daily and/or event administrative exposure limits.*

*Workers who exceed their event administrative limit of 5 rem Total Effective Dose Equivalent (TEDE) will be assigned to tasks that do not involve exposure to ionizing radiation without specific authorization from the Chief of Field Operations or designee.*

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 031

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.d

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information or appropriate cross-reference in the county plan describing protective measures such as the method for alerting, providing emergency information, and transporting mobility dependent or impaired individuals from schools, hospitals, and prisons.

**Response:**

Matagorda County Procedure 40 'Hospital District Administrator', Procedure 50 'Transportation Officer' and Procedure 70 'American Red Cross Director' provides the necessary information for protective measures such as the method for alerting, providing emergency information, and transporting mobility dependent or impaired individuals.

Procedures 40, 50 and 70 will be added to J.10.d of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 033

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.j

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide references to the ETE study, which includes potential need for alternate routes, in the state plan.

MCBEMP, Annex W: Provide information that describes the equipment and resources that will be utilized to set up traffic control points.

**Response:**

Reference to Annex E, Section IV.C.3 will be added to J.10.i of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

This reference describes the Department of Public Safety's role and responsibility for coordinating the direction and control of emergency evacuation traffic and the development and maintenance of regional Emergency Evacuation Traffic Management Plans that establish alternate routes, contra-flow, traffic signal controls, etc. to ensure the most efficient movement of traffic.

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County Procedure 22 'Warning and Evacuation/Traffic and Access Control' describes the equipment and resources that will be utilized to set up traffic control points.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 034

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.11

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Identify the individual, by title or position that is authorized to make ingestion phase PADs. Provide information that describes how agribusiness will be notified of PADs. Include appropriate references in the cross-reference that describe the method for identifying areas of concern where sampling and monitoring should occur.

**Response:**

Annex D, Section IV.E.1-2; Annex D, Section IV.A.3; and Procedure 10, Section II will be added to J.11 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

Annex D, Section IV.E.1-2 identifies that the DSHS Accident Assessment Team is authorized to make ingestion phase PADs, then report them to Chief of Field Operations, who then reports them to the RCP representative at the SOC,DDC, and local EOC's.

Annex D, Section IV.A.3 addresses agencies that will support notification of PADs to agribusinesses.

Procedure 10, Section II addresses the method for identifying areas of concern where sampling and monitoring should occur.

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 035

**Subject:** Radiological Exposure Control

**Basis:** NUREG 0654, Criterion K.4

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information or a reference to the information that describes the risk to emergency workers who volunteer to exceed dose limits as well as limits for special conditions such as a pregnant emergency worker.

MCBEMP, Annex W: Provide information describing the actions to be taken when an emergency worker exceeds exposure limits as well as information regarding the risk for those emergency workers who volunteer to receive higher exposures.

**Response:**

Revisions to Procedure 7, Section VII.C will include information related to female emergency workers who are identified as declared pregnant women. The following text will be added to Procedure 7, Section VII.C as indicated below:

Female emergency workers who are identified as declared pregnant women will not be allowed to perform emergency or life saving tasks that could cause them to exceed 200 mrem TEDE.

Matagorda County Procedure 42 'Exposure Control for Emergency Workers' describes the actions to be taken when an emergency worker exceeds exposure limits as well as information regarding the risk for those emergency workers who volunteer to receive higher exposures.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 036

**Subject:** Radiological Exposure Control

**Basis:** NUREG 0654, Criterion K.5.a

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information that describes the procedure for monitoring of personnel or equipment, controlling the spread of contamination, and identify instruments that are expected to be used for this task.

**Response:**

Matagorda County Procedure 72 'Reception Center Operations (Environmental Health Department)' describes monitoring of personnel or equipment, controlling the spread of contamination, and identifying instruments that are expected to be used for this task.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 037

**Subject:** Radiological Exposure Control

**Basis:** NUREG 0654, Criterion K.5.b

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information that describes the procedure for monitoring and decontamination of persons or equipment and documentation of contamination readings on people or equipment. Also, provide the criteria used to determine when a person should be sent for medical treatment.

**Response:**

Matagorda County Procedure 72 'Reception Center Operations (Environmental Health Department)' describes monitoring and decontamination of persons or equipment and documentation of contamination readings on people or equipment. In addition the procedure provides the criteria used to determine when a person should be sent for medical treatment.

Procedure 72 will be added to K.5.b of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 038

**Subject:** Exercises and Drills

**Basis:** NUREG 0654, Criteria N.2.d and N.2.e

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide revised plans that include radiological monitoring drills as required by Planning Standards N.2.d and N.2.e

**Response:**

Revisions to Tab 1, Attachment 4 will be made to reference Radiological Monitoring and Health Physics drills. The marked up text changes to Tab 1, Attachment 4, Section II.B.4 text will be revised by adding the shaded text as indicated below:

1. Radiological monitoring drills – teams will participate in an annual full scale exercise. Health physics drills are not required annually because the skills and procedures involved are identical to those used in routine sampling at other locations, and because the communications and record keeping systems are in daily use.

Additionally, Tab 1, Attachment 4, Section II.B.4 will be added to N.2.d and N.2.e of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the Tab 1, Attachment 4, Section II.B.4 the COLA will be updated.

FEMA RAI STP 039

**Subject:** Exercises and Drills

**Basis:** NUREG 0654, Criteria N.2.d and N.2.e

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a statement in the plan that indicates that objectives will be addressed in the scenario developed for exercises and drills.

**Response:**

Revisions to Annex D Tab 1, Attachment 4 will be made to ensure that scenario objectives are addressed for exercises and drills. Annex D, Tab 1, Attachment 4, Section IV, Item 1 text will be revised as indicated below:

1. Basic objective(s) of each drill and exercise.

Additionally, Annex D, Tab 1, Attachment 4, Section IV will be added to N.3.a of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D Tab 1, Attachment 4, Section IV the COLA will be updated.

FEMA RAI STP 040

**Subject:** Radiological Emergency Response Training

**Basis:** NUREG 0654, Criterion O.4.c

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide information in the plan that will address the scope, nature, and frequency of training for monitoring teams and accident assessment personnel.

**Response:**

Annex D, Tab 1, Attachment 4, Section I.E, as shown below will be added to O.4.c of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

1. *Accident Assessment Team – In addition to the reactor plant systems course (or equivalent), personnel will receive specific training on the computerized dose assessment models in use within the Agency for accident assessment. Retraining is accomplished during participation in semi-annual drills and exercises.*
2. *Field Monitoring Teams – Agency personnel and their Department of Public Safety counterparts will receive initial instruction via a radiological monitoring course conducted by the Emergency Planning Staff. Retraining will be accomplished during exercises, with additional classroom instruction to be presented as needs are identified.*

A marked up copy of the State 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 042

**Subject:** Planning

**Basis:** NUREG 0654, Criterion P.5

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a list of organizations or individuals to whom the plan and procedures will be distributed and include a statement that indicates that revised pages will be dated and marked to show where changes are made.

**Response:**

Revisions to Tab 1, Section IV will include a statement that indicates that revised pages will be dated and marked to show where changes are made. The following text will be added to Annex D, Tab 1, Section IV as indicated below:

DSHS is responsible for forwarding REM plans and approved changes to all organizations discussed in this plan/tab and to appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

Additionally, Annex D Appendix 1 and Annex D, Tab 1, Section IV will be added to P.5 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D, Tab 1, Section IV the COLA will be updated.

FEMA RAI STP 043

**Subject:** Planning

**Basis:** NUREG 0654, Criterion P.6

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

TEMP, Annex D: Provide a list of supporting plans and their source.

MCBEMP, Annex W: Provide a list of supporting plans and their source.

**Response:**

Revisions to Annex D, Tab 1 will be made to include an Attachment 5 to list those supporting plans and their source. Attachment 5 text will be created as indicated below:

Support Plans and Letters of Agreement

1. FEDERAL PLANS

National Response Framework  
Radiological Emergency Response Annex  
FRMAC Radiological Assistance Plan

2. STATE PLANS

Texas Emergency Management Basic Plan  
Texas Emergency Response Annexes A thru W:

- A. Warning
- B. Communications
- C. Shelter and Mass Care
- D. Radiological Emergency Management
- E. Evacuation
- F. Firefighting
- G. Law Enforcement
- H. Health and Medical Services
- I. Public Information
- J. Recovery
- K. Public Works and Engineering
- L. Energy and Utilities
- M. Resource Support
- N. Direction and Control
- O. (Reserved for Future Use)

- P. Hazard Mitigation
- Q. Hazardous Materials and Oil Spill
- R. Search and Rescue
- S. Transportation
- T. Donations Management
- U. Terrorist Incident Response
- V. Food and Water
- W. Military Support

Southern Mutual Radiological Assistance Plan (SMRAP)

3. COUNTY PLANS

A. Hood County:

- Hood County Emergency Response Basic Plan
- Hood County Annex W, Radiological Emergency Management Plan
- Hood County Radiological Emergency Management Procedures
- Hood/Somervell Hospital District Radiological Emergency Plan

B. Somervell County:

- Somervell County Emergency Response Basic Plan
- Somervell County Annex W, Radiological Emergency Management Plan
- Somervell County Radiological Emergency Management Procedures

C. Matagorda County:

- Matagorda County Emergency Response Basic Plan
- Matagorda County Annex W, Radiological Emergency Management Plan
- Matagorda County Radiological Emergency Management Procedures
- Matagorda County Hospital District Radiological Emergency Response Plan

4. UTILITY PLANS

A. Comanche Peak Nuclear Power Plant:

- Comanche Peak Emergency Plan
- Comanche Peak Emergency Procedures

B. South Texas Project Nuclear Operating Company:

- STP Emergency Plan
- STP Emergency Procedures
- STP Emergency Communications Directory

5. LETTERS OF AGREEMENT (LOA)

Comanche Peak Annual LOA  
South Texas Project Annual LOA  
Texas A & M University Laboratory LOA  
University of Texas Laboratory LOA

Additionally, Annex D, Tab 1, Attachment 5 will be added to P.6 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Matagorda County Basic Plan Section I 'Authority and References' will be revised to provide a list of supporting plans. The following items will be added to Basic Plan Section I.C.

- 9. Matagorda County Annex W. Radiological Emergency Management Plan
- 10. Matagorda County Radiological Emergency Management Procedures
- 11. Matagorda County Hospital District Radiological Emergency Plan

Additionally, Basic Plan Section I .C will be added to P.6 of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the State Annex D, Tab 1, Attachment 5 and Matagorda County Basic Plan Section I the COLA will be updated.

FEMA RAI STP 044**Subject:** Planning**Basis:** NUREG 0654, Criterion P.7**SRP Acceptance Criterion:** Requirement H**RAI Description:**

TEMP, Annex D: Provide an updated index of procedures that indicates the section of the plan to be implemented by each procedure and refer to the index in the plan's NUREG-0654 cross-reference.

**Response:**

Revisions to Annex D, Tab 1 will be made to include an Attachment 6 which will provide a cross reference of state procedures to sections of the plan. Attachment 6 text will be created as indicated below:

Department of State Health Services  
Procedures Cross Reference

<b>PROCEDURE</b>	<b>TITLE</b>	<b>PLAN SECTION</b>
1	Accident Assessment: Plume Exposure	Annex D, Section IV, IV.F Annex D, Tab 1, Chapter 1, Section VII.C Annex D, Tab 1, Chapter 2, Section VII.C Annex D, Tab 2, Chapter 1, Section VII.C
2	Accident Assessment: Ingestion Pathway	Annex D, Section IV.E-F, V.B Annex D, Tab 1, Chapter 1, Section VII.C Annex D, Tab 1, Chapter 2, Section VII.C Annex D, Tab 2, Chapter 1, Section VIII.A-C
3	Area Survey and Decontamination	Annex D, Tab 1, Chapter 2, Section VII.B-C
4	Tool & Equipment Decontamination	Annex D, Section IV.E-H Annex D, Tab 1, Chapter 2, Section VII.B-C
5	Personnel Monitoring and Decontamination	Annex D, Tab 1, Section IV Annex D, Tab 1, Chapter 2, Section VII.B-C

PROCEDURE	TITLE	PLAN SECTION
6	Area Decontamination Methods	Annex D, Section IV.E-H Annex D, Tab 1, Chapter 2, Section VII
7	Personnel Dosimetry and Exposure Records	Annex D, Tab 1, Chapter 1, Section VII.C Annex D, Tab 1, Chapter 2, Section VII.B-C
8	Respiratory Protection	Annex D, Section IV.H
9	Radioprotective Drugs	Annex D, Tab 1, Section VII.A
10	Monitoring and Sampling Gamma Releases	Annex D, Section IV, V.B Annex D, Tab 1, Section VI.B Annex D, Tab 1, Ch. 1, Section III.C, VII.B-C Annex D, Tab 1, Ch. 1, Attachments 9-10 Annex D, Tab 1, Ch. 2, Section III.C, VII.B-C Annex D, Tab 1, Chapter 2, Attachments 9-10 Annex D, Tab 2, Chapter 1, Section III.A.1-2 Annex D, Tab 2, Chapter 1, Attachments 2-4
11	Monitoring and Sampling Alpha Releases	Annex D, Section IV, V.B Annex D, Tab 1, Section VI.B Annex D, Tab 1, Chapter 1, Section III.C.1-2 Annex D, Tab 1, Chapter 1, Attachments 9-10 Annex D, Tab 1, Chapter 2, Section III.C.1-2 Annex D, Tab 1, Chapter 2, Section VII.B-C Annex D, Tab 1, Chapter 2, Attachments 9-10 Annex D, Tab 2, Chapter 1, Section III.A.1-2 Annex D, Tab 2, Chapter 1, Attachments 2-4

PROCEDURE	TITLE	PLAN SECTION
13	Emergency Notification and Deployment	Annex D, Appendix 2 Annex D, Section IV.B, V.B Annex D, Tab 1, Section VII Annex D, Tab 1, Chapter 1, Section VI Annex D, Tab 1, Ch. 2, Sections III, V, VI, VII.B Annex D, Tab 2, Ch. 1, Section V, VI
14	Public Information	Annex D, Tab 1, Section VII.A, F
17	Radio Communications	Annex D, Tab 1, Section VII.B Tab 1, Attachment 4
22	Recovery Operations	Annex D, Section IV.A, V.B Annex D, Appendix 2
24	Contamination Control Team Operations	Annex D, Section IV.E-H, V.B Annex D, Tab 1, Section IV Annex D, Tab 1, Chapter 1, Section VII.C Annex D, Tab 1, Chapter 1, Attachment 5, 12 Annex D, Tab 1, Chapter 2, Section VII.B-C Annex D, Tab 1, Chapter 2, Attachment 4, 5 Annex D, Tab 2, Chapter 1, Attachment 1, 7
25	Decontamination Assistance Team Operations	Annex D, Section IV.H Annex D, Tab 1, Ch. 1, Attachments 11-12 Annex D, Tab 1, Ch. 2, Section VII.B-C Annex D, Tab 1, Ch. 2, Attachments 9-10 Annex D, Tab 2, Ch. 1, Attachment 2
26	Selection and Use of Personnel Protective Equipment	Annex D, Section IV.H

Additionally, Annex D, Tab 1, Attachment 6 will be added to P.7 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 001.

Upon revision of the State Annex D, Tab 1 the COLA will be updated.

FEMA RAI STP 045**Subject:** Planning**Basis:** NUREG 0654, Criterion P.1**SRP Acceptance Criterion:** Requirement H**RAI Description:**

MCBEMP, Annex W: Provide information on the training program and requirements for emergency planners that are responsible for the development, maintenance, and distribution of emergency plans.

**Response:**

Matagorda County Annex W Tab 6 Section III:C.1 will be revised to provide information on the training program and requirements for emergency planners that are responsible for the development, maintenance, and distribution of emergency plans. The text in Annex W Tab 6 Section III.C.1 will be revised as indicated below:

C. Training Program

1. The responsibility for coordination of the development and presentation of the training program rests with the Emergency Management Coordinator. The Emergency Management Coordinator has the over all responsibility for the training program as well ensuring each member of the team receives initial and retraining of those assigned emergency duties under the Matagorda County plans and procedures. The Emergency Management Coordinator will participate in continuous training on the planning effort in conjunction with state and federal guidelines.

Additionally, Annex W Tab 6 Section III.C.1 will be added to P.1 of the county 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

Upon revision of the Matagorda County Annex W Tab 6 Section III.C.1 the COLA will be updated.

FEMA RAI STP 046

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.f

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide details in the county plans that describe the decision making process for administering radioprotective drugs during rapidly developing emergencies.

**Response:**

Matagorda County Procedure 41 'Environmental Health Director' describes the decision making process for administering radioprotective drugs during rapidly developing emergencies.

No COLA revisions are required as a result of this RAI response.

FEMA RAI STP 047

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.k

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information that describes the resources available (manpower and equipment) for dealing with traffic impediments and rerouting traffic.

**Response:**

Matagorda County Procedure 22 'Warning and Evacuation/Traffic and Access Control' describes the resources available (manpower and equipment) for dealing with traffic impediments and rerouting traffic.

No COLA revisions are required as a result of this RAI response.

FEMA RAI STP 048

**Subject:** Emergency Facilities and Equipment

**Basis:** NUREG 0654, Criterion H.4

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide an updated cross-reference to include the portions of the county plan that fully address this planning standard.

**Response:**

Procedure 13 'Emergency Operations Center Concept of Operations and Activation' and Procedure 20 'Sheriff's Office Dispatcher' will be added to H.4 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 010.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 049

**Subject:** Emergency Facilities and Equipment

**Basis:** NUREG 0654, Criterion H.11

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide references to specific procedures or sections of procedures that address this planning standard.

**Response:**

STP Procedure 0PGP05-ZV-0012 'Emergency Facility Inventories' and County Procedure 42 'Exposure Control for Emergency Workers' will be added to H.11 of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the RAI response STP 010.

No additional COLA revisions are required as a result of this RAI response.

FEMA RAI STP 050

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.k

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information that describes the resources available (manpower and equipment) for dealing with traffic impediments and rerouting traffic.

**Response:**

Matagorda County Procedure 22 'Warning and Evacuation/Traffic and Access Control' describes the resources available (manpower and equipment) for dealing with traffic impediments and rerouting traffic.

No COLA revision is required as a result of this RAI response.

FEMA RAI STP 051

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.10.1

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide estimated evacuation times for the movement of school children and other special populations.

**Response:**

Matagorda County Procedure 14 'Protective Action Guides' describes estimated evacuation times for the movement of school children and other special populations.

No COLA revision is required as a result of this RAI response.

FEMA RAI STP 052

**Subject:** Protective Response

**Basis:** NUREG 0654, Criterion J.12

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide a procedure or a description in the plan of the method for monitoring, contamination control, and layout of the reception center.

**Response:**

Matagorda County Procedure 71 'Reception Center Operations' and Procedure 72 'Reception Center Operations (Environmental Health Director)' describes the methods for monitoring, contamination control, and layout of the reception center.

No COLA revision is required as a result of this RAI response.

FEMA RAI STP 053

**Subject:** Planning

**Basis:** NUREG 0654, Criterion P.10

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Identify the individual, by title, which is responsible for performing the review and update of the county procedures that include the call lists.

**Response:**

Matagorda County Procedure 11 'Emergency Management Coordinator' Step 2.4 describes the individual, by title, who is responsible for performing the review and update of the county procedures that include the call lists.

No COLA revision is required as a result of this RAI response.

FEMA RAI STP 055

**Subject:** Exercises and Drills

**Basis:** NUREG 0654, Criterion N.2.c

**SRP Acceptance Criterion:** Requirement H

**RAI Description:**

MCBEMP, Annex W: Provide information that addresses the items outlined in Guidance Memorandum (GM) MS-1, Medical Services.

**Response:**

Matagorda County Hospital District Plan and Procedures will be added to N.2.c of the 'Evaluation Criteria Cross Reference Index to NUREG 0654.'

A marked up copy of the County 'Evaluation Criteria Cross Reference Index to NUREG 0654' is provided as part of the response to RAI STP 010.

No additional COLA revisions are required as a result of this RAI response.