



FEMA

FEB 13 2009

Mr. Elmo E. Collins, Jr.
Regional Administrator
U.S. Nuclear Regulatory Commission Region IV
611 Ryan Plaza, Suite 400
Arlington, Texas 76011-8064

Dear Mr. Collins:

Enclosed is one copy of the Final Report for the Off-site Biennial Exercise held on October 29, 2008 for the Diablo Canyon Power Plant (DCPP). The purpose of this exercise was to assess the level of state and local preparedness in responding to a radiological emergency. The final exercise report was prepared by the U.S. Department of Homeland Security's Federal Emergency Management Agency (FEMA), Region IX Radiological Emergency Preparedness Program staff.

No deficiencies were identified during this exercise for the State of California or San Luis Obispo County. There were three Areas Requiring Corrective Action (ARCA) identified as a result of the exercise; two ARCAs were corrected. We will monitor the correction of the remaining ARCA. A detailed discussion of these ARCAs can be found in Part 4 of the Final Report.

Based on the evaluation of the October 29, 2008 Biennial Exercise, the off-site radiological emergency response plans for the state of California and the affected local jurisdictions site-specific to DCPP can be implemented, and are adequate to provide reasonable assurance that appropriate measures can be taken off-site to protect the health and safety of the public in the event of a radiological emergency at DCPP. I would also like to take this opportunity to acknowledge the many individuals that participated in this successful exercise. Their dedication to this program was clearly evident.

Therefore, the Code of Federal Regulations, Title 44 Part 350 interim approval of the off-site radiological emergency response plans and preparedness for the state of California, site-specific to DCPP, will remain in effect.

Mr. Elmo E. Collins, Jr.
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If you have any questions or need additional information, please contact me at (510) 627-7100. Your staff may also contact Mr. Harry Sherwood, Radiological Assistance Committee Chair, at (510) 627-7240.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen E. Armes". The signature is written in a cursive style with a large, stylized initial "K".

Karen E. Armes
Acting Regional Administrator
FEMA RIX

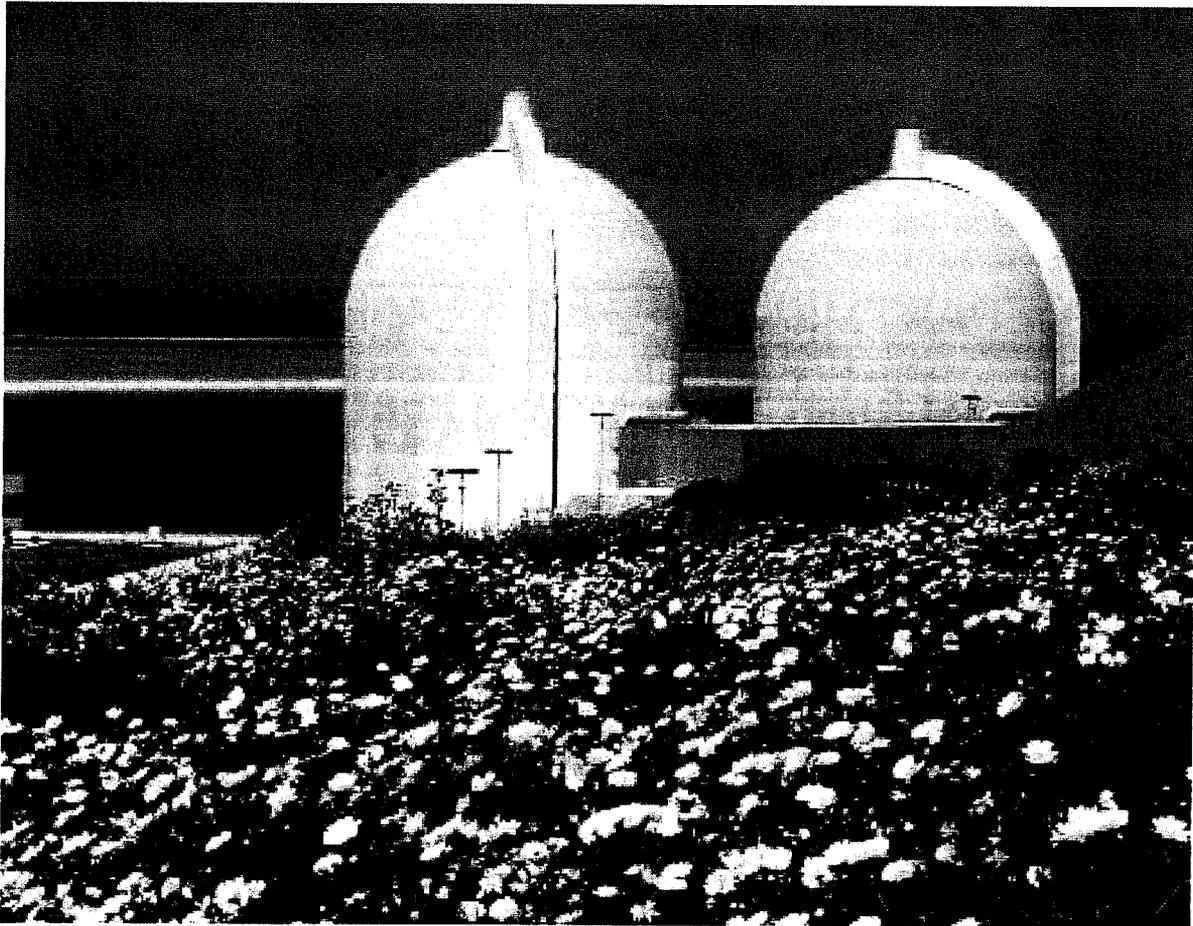
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cc: NRC Headquarters Document Control Desk
US Nuclear Regulatory Commission
Washington, DC 20555-0001

Diablo Canyon Power Plant
Exercise Report - 2008-10-29
Final Report - Radiological Emergency
Preparedness (REP) Program
2009-01-26



FEMA





FEMA

Exercise Report

Diablo Canyon Power Plant

Exercise Date: 2008-10-29

Report Date: 2009-01-26

U.S. DEPARTMENT OF HOMELAND SECURITY

Federal Emergency Management Agency

REP Program

1111 Broadway St., Suite 1200

Oakland, CA 94607

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1. Executive Summary

On October 29, 2008, a biennial Radiological Emergency Preparedness Program (REPP) exercise was conducted in the plume exposure pathway emergency planning zone (EPZ) around the the Diablo Canyon Power Plant. The U.S. Department of Homeland Security (DHS) Federal Emergency Management Agency (FEMA) Region IX evaluated the exercise. The purpose was to assess the level of preparedness of state and local responders to react to a simulated radiological emergency at the Diablo Canyon Power Plant. This exercise was held in accordance with FEMA policies and guidance concerning the implementation of state and local radiological emergency preparedness plans and procedures.

The previous exercise at this site was conducted on October 26, 2006. The qualifying emergency preparedness exercise was conducted on August 19, 1981.

FEMA Region IX wishes to acknowledge the efforts of the many individuals who participated in this exercise.

Protecting the public health and safety is the full-time job of some of the exercise participants and an additional assigned responsibility for others. Still, others have willingly sought this responsibility by volunteering to provide vital emergency services to their communities. Cooperation and teamwork of all the participants were evident during this exercise.

The local organizations, except where noted in this report, demonstrated knowledge of their emergency response plans and procedures and adequately implemented them. There were no Deficiencies and three Areas Requiring Corrective Action (ARCA) identified as a result of this exercise. Two ARCAs were corrected during the exercise, and one ARCA remains uncorrected.

2. Introduction

On December 7, 1979, the President directed the Federal Emergency Management Agency (FEMA) to assume the lead responsibility for all off-site nuclear planning and response, FEMA's activities are conducted pursuant to 44 Code of Federal Regulations (CFR) Parts 350, 351 and 352. These regulations are a key element in the Radiological Emergency Preparedness (REP) Program that was established following the Three Mile Island Nuclear Station accident in March 1979.

FEMA's rule contained in 44 CFR 350 establishes the policies and procedures for the FEMA's initial and continued approval of tribal, state and local governments radiological emergency planning and preparedness for commercial nuclear power plants. This approval is contingent, in part, on state and local government participation in joint exercises with licensees.

FEMA's responsibilities in radiological emergency planning for fixed nuclear facilities include the following:

- Taking the lead in off-site emergency planning and in the review and evaluation of radiological emergency response plans (RERPs) and procedures developed by state and local governments;

- Determining whether such plans and procedures can be implemented on the basis of observation and evaluation of exercises of the plans and procedures conducted by state and local governments;

- Responding to requests by the U.S. Nuclear Regulatory Commission (NRC) pursuant to the Memorandum of Understanding between the NRC and FEMA dated June 17, 1993 (Federal Register, Vol. 58, No. 176, September 14, 1993); and

- Coordinating the activities of Federal agencies with responsibilities in the radiological emergency planning process:

- U.S. Department of Commerce (DOC)

- U.S. Nuclear Regulatory Commission (NRC)

- U.S. Environmental Protection Agency (EPA)

- U.S. Department of Energy (DOE)
- U.S. Department of Health and Human Services (DHHS)
- U.S. Department of Homeland Security-FEMA
- U.S. Department of Transportation (DOT)
- U.S. Department of Agriculture (USDA)
- U.S. Department of the Interior (DOI)
- U.S. Food and Drug Administration (FDA)

Representatives of these agencies serve in the Radiological Assistance Committee (RAC), which is chaired by the Branch Chief of the FEMA RIX-National Preparedness Division (NPD)-Technological Hazards Branch (THB).

Formal submission of the RERPs for the Diablo Canyon Power Plant (DCPP) to FEMA Region IX by the state of California and involving local jurisdictions occurred on April 25, 1988.

FEMA RIX-National Preparedness Division (NPD)-Technological Hazards Branch (THB) evaluated a Plume Phase Exercise on October 29, 2008, to assess the capabilities of state and local emergency preparedness organizations in implementing their RERPs and procedures to protect the public health and safety during a radiological emergency involving the Diablo Canyon Power Plant. The purpose of this exercise report is to present the exercise results and findings on the performance of the off-site response organizations (OROs) during a simulated radiological emergency.

The findings presented in this report are based on the evaluations of the federal evaluation team, with final determinations made by the Branch Chief, THB-NPD, FEMA Region IX, and approved by the Regional Administrator.

The criteria utilized in the evaluation process are contained in:

NUREG-0654/FEMA-REP-1, Rev. 1, Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants, November 1980; and the Interim REP Program Manual, including the Radiological Emergency Preparedness Exercise Evaluation Methodology (August 2002).

Chapter 3 of this report, entitled "Exercise Overview," presents basic information and data relevant to the exercise. This section of the report contains a description of the plume and

ingestion pathway EPZs, a listing of all participating jurisdictions and functional entities that were evaluated, and a tabular presentation of the time of actual occurrence of key exercise events and activities.

Chapter 4 of this report, entitled "Exercise Evaluation and Results," presents detailed information on the demonstration of applicable exercise evaluation areas of each jurisdiction or functional entity. If applicable, this section also contains: (1) descriptions of all Deficiencies and ARCAs assessed during this exercise and recommended corrective actions and (2) descriptions of unresolved ARCAs assessed during previous exercises and the status of the OROs effects to resolve them.

3. Exercise Overview

Contained in this section are data and basic information relevant to the October 29, 2008, biennial exercise to test a portion of the off-site emergency response capabilities for the area surrounding the Diablo Canyon Power Plant. This section of the report includes a description of the plume pathway EPZ, and a listing of all participating jurisdictions and functional entities that were evaluated.

Federal guidance identifies an approximate ten-mile area where FEMA has primary oversight responsibilities for off-site plans and exercise performance. Protective Action Zones (PAZs) 1 through 5 form the basis of the basic area where the Federal government has primary oversight responsibilities. As such, evaluation of exercise criteria is focused and limited to decisions and/or response activities that take place within PAZs 1 through 5. The portion of the Diablo Canyon Power Plant Emergency Planning Zone that comprises PAZs 6 through 12 is an area where the state of California has primary oversight responsibility. The state of California is the entity that will determine whether any corrective actions are required for actions or decisions that affect PAZs 6 through 12. Both areas together comprise the Plume Emergency Planning Zone.

3.1. EPZ Description

Plume Emergency Planning Zone Description:

The state of California has designated a Basic Emergency Planning Zone (BEPZ) which extends out from a 10-mile circle around the plant to include surrounding cities. The BEPZ includes the following areas:

Cities: Arroyo Grande; Grover Beach; Morro Bay; Pismo Beach; and San Luis Obispo.

Unincorporated areas of San Luis Obispo County: Avila Beach; Baywood Park; Cayucos; Cienega Valley; Clark Valley; Indian Knob; Los Osos; Los Osos Valley; northern Nipomo Mesa; Oceano; Port San Luis; Prefumo Canyon; Price Canyon; San Luis Bay Estates; See Canyon; and Squire Canyon.

Institutions: California Men's Colony; California Polytechnic State University; Camp San Luis Obispo; and Cuesta College.

Parks and Recreational Areas: Cayucos State Beach; Los Osos Oaks State Reserve; Montana de Oro State Park; Morro Bay State Park; Morro Strand State Beach; Oceano Dunes State Vehicle Recreational Area; Pismo State Beach; and Whale Rock Reservoir Recreational Area.

Ingestion Pathway Zone Description:

The DCPD Ingestion Pathway Zone extends for 50 miles around the DCPD site and includes portions of San Luis Obispo County. In addition, it includes portions of the following Counties:

Monterey
Santa Barbara

3.2. Exercise Participants

Agencies and organizations of the following jurisdictions participated in the Diablo Canyon Power Plant exercise:

State Jurisdictions

California Department of Forestry and Fire Protection
California Department of Public Health
California Department of State Parks
California Department of Transportation
California Governor's Office of Emergency Services
California Highway Patrol
California Men's Colony

Risk Jurisdictions

Avila Beach Community Services District Fire Department
Bellevue-Santa Fe Charter School
City of Pismo Beach
City of Pismo Beach Fire Department
City of Pismo Beach Police Department
City Of Pismo Beach Public Works Department
Port San Luis Harbor District
San Luis Coastal Unified School District

- San Luis Obispo County Administrative Office
- San Luis Obispo County Agriculture Commissioner's Office
- San Luis Obispo County Air Pollution Control District
- San Luis Obispo County Board of Supervisors
- San Luis Obispo County Counsel
- San Luis Obispo County Communications Shop
- San Luis Obispo County Department of Social Services
- San Luis Obispo County Emergency Medical Services Agency
- San Luis Obispo County Environmental Health Services
- San Luis Obispo County Fire Department
- San Luis Obispo County General Services Agency
- San Luis Obispo County Human Resources Department
- San Luis Obispo County Information Technology Department
- San Luis Obispo County Office of Education
- San Luis Obispo County Planning and Building Department
- San Luis Obispo County Public Health Department
- San Luis Obispo County Public Works Department
- San Luis Obispo County Sheriff's Department
- San Luis Obispo Regional Transportation Authority

Support Jurisdictions

- Santa Barbara County Office of Emergency Services

Private Jurisdictions

- Amateur Radio Emergency Service/Radio Amateur Civil Emergency Services
- American Red Cross-San Luis Obispo County Chapter
- Diablo Canyon Power Plant
- Long-term Care Ombudsman
- Pacific Gas and Electric Company

Federal Jurisdictions

- National Weather Service
- Nuclear Regulatory Commission (NRC)
- United States Coast Guard

3.3. Exercise Timeline

Table 1 - Exercise Timeline
DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

Emergency Classification Level or Event	Time Utility Declared	CHADOC	COEDOC	PWDOC	JIC	OEL	PSLHD
Unusual Event	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Alert	0747	0829	0854	0831	0758	0830	0834
Site Area Emergency	1007	1013	1026	1015	1011	1009	1015
General Emergency	12005	1209	1209	1206	1207	-----	-----
Simulated Rad. Release Started	1200	1205	1209	1253	1207	1235	-----
Simulated Rad. Release Terminated	1332	1358	1424	-----	1350	-----	-----
Facility Declared Operational		0850	0850	0748	0928	1020	0757
Local Declaration of State of Emergency		-----	-----	-----	-----	-----	-----
County Declaration of State of Emergency		-----	-----	-----	1035	-----	1050
Governor's Declaration of State of Emergency		1321	-----	-----	1329	-----	-----
Exercise Terminated		1447	1448	1446	1446	-----	1120
Early Precautionary Actions:							
Close Avila Beach		-----	-----	-----	-----	-----	-----
Close Pismo Beach		-----	-----	-----	-----	-----	-----
Close Oceano Dunes State Vehicle Recreational Area		-----	-----	-----	-----	-----	-----
Close El Chorro Regional Park, Natural Area and Campground		-----	-----	-----	-----	-----	-----
Close Oceano County Campground		-----	-----	-----	-----	-----	-----
Close Dairy Creek Golf Course		-----	-----	-----	-----	-----	-----
Close Morro Bay Golf Course		-----	-----	-----	-----	-----	-----
Close Oceano Community Park		-----	-----	-----	-----	-----	-----
Close Costal Dunes RV Park		-----	-----	-----	-----	-----	-----
Close Montana de Oro State Park		-----	-----	-----	-----	-----	-----
Close North Beach and Oceano State Campground		-----	-----	-----	-----	-----	-----
Close Olde Port Beach		-----	-----	-----	-----	-----	0853
Close Port San Luis		-----	-----	-----	-----	-----	0853
Close Los Osos Oaks State Reserve		-----	-----	-----	-----	-----	-----
Close Morro Bay State Park, Marina and Campground		-----	-----	-----	-----	-----	-----
Close Morro Strand State Beach and Campground		-----	-----	-----	-----	-----	-----
Move Bellevue-Santa Fe to C.L. Smith Elementary		-----	0930	-----	-----	-----	-----
Move Baywood Elementary, Monarch Grove Elementary, Sunnyside Preschool, Los Osos Middle School and Del Mar Elementary to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
Move Shell Beach Elementary and Judkins Middle School to Nipomo High School		-----	-----	-----	-----	-----	-----
Move Cayucos Elementary to Santa Lucia Middle School		-----	-----	-----	-----	-----	-----
Move Morro Bay High School to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
Close Avila Bike Trail		-----	-----	-----	-----	-----	-----

Table 1 - Exercise Timeline
DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

Emergency Classification Level or Event	Time Utility Declared	CHADOC	COEDOC	PWDOC	JIC	OEL	PSLHD
Close Avila Beach Community Park		-----	-----	-----	-----	-----	-----
Close Cuesta Community Park		-----	-----	-----	-----	-----	-----
Close Paul Amchew Park		-----	-----	-----	-----	-----	-----
Close Bishop Park, Natural Area and Trails		-----	-----	-----	-----	-----	-----
Close Hardie Park		-----	-----	-----	-----	-----	-----
Close Cayucos State Beach, Pier and Studio Drive		-----	-----	-----	-----	-----	-----
Move C.L. Smith Elementary, Bishop's Peak/Teach Elementary, Hawthorne Elementary and Pacheco Elementary to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
Move Sinsheimer Elementary, Los Rancho Elementary, Laguna Middle School, Pacific Beach High School and Vincente School to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
Move San Luis Obispo High School to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
Move Chris Jespersion, Cuesta CA Preschool, Deaf/HH Class and Independent Skills Program to Paso Robos Event Center		-----	-----	-----	-----	-----	-----
1st Protective Action Decision: Evacuate PAZ 1 and 2		1228	-----	-----	1234	-----	-----
1st Siren Activation		-----	1240	1230	-----	-----	-----
1st EAS or EBS Message		-----	-----	-----	-----	-----	-----
1st Follow-up EAS Message		-----	-----	-----	-----	-----	-----
2nd Protective Action Decision: Shelter PAZ 3		1359	-----	-----	1321	-----	-----
2nd Siren Activation		-----	-----	1327	-----	-----	-----
2nd EAS or EBS Message		-----	-----	-----	-----	-----	-----
2nd Follow-up EAS Message		-----	-----	-----	-----	-----	-----
Agriculture Protective Action Decision 1: PAZ 1, 2 and 3 stop harvesting vineyards and groves, stop pumping water and livestock stored feed and shelter		-----	-----	-----	1117	-----	-----
Agriculture Protective Action Decision 2: Agriculture hold on PAZ 1 and 2; PAZ 3, 6 and 7 stop harvesting vineyards and groves, stop pumping water and livestock stored feed and shelter		-----	-----	-----	1317	-----	-----
Agriculture Protective Action Decision 3: PAZ 4, 6, 7 and 8 dairy animals sheltered, stored feed, water and shelter; PAZ 4 and 8 all non-dairy livestock stored feed, water and shelter		-----	-----	-----	1359	-----	-----
Agriculture Protective Action Decision 4: PAZ 3 hold livestock, dairy products and harvested crops		-----	-----	-----	1359	-----	-----
KI Administration Decision: Emergency Workers in PAZs 1, 2 and all Field Teams		1254	-----	1253	-----	1315	-----

Table 1 - Exercise Timeline
DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

Emergency Classification Level or Event	Time Utility Declared	San Luis Obispo County EOC	PAC	UDAC	County Fire Station #63	PBEOC
Unusual Event	N/A	N/A	N/A	N/A	N/A	N/A
Alert	0747	0813	0758	0825	0819	0844
Site Area Emergency	1007	1009	1011	1009	1015	1040
General Emergency	12005	1206	1207	1206	1209	1228
Simulated Rad. Release Started	1200	1206	1207	1200	1209	1228
Simulated Rad. Release Terminated	1332	1400	1350	1336	-----	1341
Facility Declared Operational		0818 Storm; 0843 Alert	0928	0911	24 Hours	0805
Local Declaration of State of Emergency		-----	-----	-----	-----	0948
County Declaration of State of Emergency		1030	1035	-----	-----	1050
Governor's Declaration of State of Emergency		1322	1329	-----	-----	1340
Exercise Terminated		1446	1446	1446	1445	1448
Early Precautionary Actions:						
Close Avila Beach		-----/0905	-----	-----	-----	-----
Close Pismo Beach		0755/0855	-----	-----	-----	0751
Close Oceano Dunes State Vehicle Recreational Area		0815/0945	-----	-----	-----	-----
Close El Chorro Regional Park, Natural Area and Campground		0820/0940	-----	-----	-----	-----
Close Oceano County Campground		0820/0940	-----	-----	-----	-----
Close Dairy Creek Golf Course		0820/0940	-----	-----	-----	-----
Close Morro Bay Golf Course		0820/0940	-----	-----	-----	-----
Close Oceano Community Park		0820/0940	-----	-----	-----	-----
Close Costal Dunes RV Park		0820/0940	-----	-----	-----	-----
Close Montana de Oro State Park		0827/0915	-----	-----	-----	-----
Close North Beach and Oceano State Campground		0855/0915	-----	-----	-----	-----
Close Olde Port Beach		0905/1000	-----	-----	-----	-----
Close Port San Luis		0905/1000	-----	-----	-----	-----
Close Los Osos Oaks State Reserve		0905/0936	-----	-----	-----	-----
Close Morro Bay State Park, Marina and Campground		0910/1221	-----	-----	-----	-----
Close Morro Strand State Beach and Campground		0910/1125	-----	-----	-----	-----
Move Bellevue-Santa Fe to C.L. Smith Elementary		0925	-----	-----	-----	-----
Move Baywood Elementary, Monarch Grove Elementary, Sunnyside Preschool, Los Osos Middle School and Del Mar Elementary to Paso Robos Event Center		1000	-----	-----	-----	-----
Move Shell Beach Elementary and Judkins Middle School to Nipomo High School		1100	-----	-----	-----	-----

Table 1 - Exercise Timeline
DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

Emergency Classification Level or Event	Time Utility Declared	San Luis Obispo County EOC	PAC	UDAC	County Fire Station #63	PBEOC
Move Cayucos Elementary to Santa Lucia Middle School		1120	-----	-----	-----	-----
Move Morro Bay High School to Paso Robos Event Center		1130	-----	-----	-----	-----
Close Avila Bike Trail		1213/1227	-----	-----	-----	-----
Close Avila Beach Community Park		1213/1227	-----	-----	-----	-----
Close Cuesta Community Park		1213/1410	-----	-----	-----	-----
Close Paul Amchew Park		1213/1410	-----	-----	-----	-----
Close Bishop Park, Natural Area and Trails		1213/1410	-----	-----	-----	-----
Close Hardie Park		1213/1410	-----	-----	-----	-----
Close Cayucos State Beach, Pier and Studio Drive		1213/1410	-----	-----	-----	-----
Move C.L. Smith Elementary, Bishop's Peak/Teach Elementary, Hawthorne Elementary and Pacheco Elementary to Paso Robos Event Center		1245	-----	-----	-----	-----
Move Sinsheimer Elementary, Los Rancho Elementary, Laguna Middle School, Pacific Beach High School and Vincente School to Paso Robos Event Center		1300	-----	-----	-----	-----
Move San Luis Obispo High School to Paso Robos Event Center		1315	-----	-----	-----	-----
Move Chris Jespersion, Cuesta CA Preschool, Deaf/HH Class and Independent Skills Program to Paso Robos Event Center		1315	-----	-----	-----	-----
1st Protective Action Decision: Evacuate PAZ 1 and 2		1227	1234	1227	1236	1228
1st Siren Activation		1239	-----	1239	-----	-----
1st EAS or EBS Message		1240	-----	1240	-----	-----
1st Follow-up EAS Message		1257	-----	1257	-----	-----
2nd Protective Action Decision: Shelter PAZ 3		1315	1321	1315	1318	1329
2nd Siren Activation		1327	-----	1327	-----	-----
2nd EAS or EBS Message		1346	-----	1328	-----	-----
2nd Follow-up EAS Message		1346	-----	-----	-----	-----
Agriculture Protective Action Decision 1: PAZ 1, 2 and 3 stop harvesting vineyards and groves, stop pumping water and livestock stored feed and shelter		1051	1117	-----	-----	1200
Agriculture Protective Action Decision 2: Agriculture hold on PAZ 1 and 2; PAZ 3, 6 and 7 stop harvesting vineyards and groves, stop pumping water and livestock stored feed and shelter		1227	1317	-----	-----	1318
Agriculture Protective Action Decision 3: PAZ 4, 6, 7 and 8 dairy animals sheltered, stored feed, water and shelter; PAZ 4 and 8 all non-dairy livestock stored feed, water and shelter		1331	1359	-----	-----	1350

Table 1 - Exercise Timeline
DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

Emergency Classification Level or Event	Time Utility Declared	San Luis Obispo County EOC	PAC	UDAC	County Fire Station #63	PBEOC
Agriculture Protective Action Decision 4: PAZ 3 hold livestock, dairy products and harvested crops		-----	1359	-----	-----	1418
KI Administration Decision: Emergency Workers in PAZs 1, 2 and all Field Teams		1252	-----	1252	1318	-----

4. Exercise Evaluation and Results

Contained in this section are the results and findings of the evaluation of all jurisdictions and functional entities that participated in the October 29, 2008 exercise to test the off-site emergency response capabilities of state and local governments in the 10-mile EPZ surrounding Diablo Canyon Power Plant.

Each jurisdiction and functional entity was evaluated on the basis of its demonstration of criteria delineated in the exercise evaluation areas as outlined in the April 25, 2002 Federal Register, Radiological Emergency Preparedness: Evaluation Methodology. Detailed information on the exercise evaluation area criteria and the extent of play agreement used in this exercise are found in Appendix 3 of this report.

4.1. Summary Results of Exercise Evaluation

The matrix presented in Table 2, on the following page, presents the status of all exercise evaluation area criteria that were scheduled for demonstration during this exercise by all participating jurisdictions and functional entities. Exercise criteria are listed by number and the demonstration status is indicated by the use of the following letters:

M - Met (No Deficiency or ARCAs assessed and no unresolved ARCAs from prior exercises)

D - Deficiency assessed

A - ARCA(s) assessed or unresolved ARCA(s) from prior exercise(s)

N - Not Demonstrated (Reason explained in Subsection B)

Table 2 - Summary of Exercise Evaluation (2 pages)

		CHP Field Operations Interview	CALTRANS Field Ops Interview	CHADOC	COEDOC	County Public Works (Field Ops)	PWDOC	County Sheriff (Field Ops)	EAS Radio Station	JIC	OEL	FMT Alpha	FMT Bravo
<p>DATE: 2008-10-29 SITE: Diablo Canyon Power Plant, A: ARCA, D: Deficiency, M: Met</p>													
Emergency Operations Management													
Mobilization	1a1			M	M		M			M	M	M	M
Facilities	1b1									M			
Direction and Control	1c1			M	M		M			M	M	M	M
Communications Equipment	1d1			M	M		M		M	M	M	M	M
Equip & Supplies to support operations	1e1	M	M	M	M	M	M	M		M	M	M	M
Protective Action Decision Making													
Emergency Worker Exposure Control	2a1												
Radiological Assessment and PARs	2b1												
Decisions for the Plume Phase -PADs	2b2												
PADs for protection of special populations	2c1												
Rad Assessment and Decision making for the Ingestion Exposure Pathway	2d1												
Rad Assessment and Decision making concerning Relocation, Reentry, and Return	2e1												
Protective Action Implementation													
Implementation of emergency worker exposure control	3a1	M	M			M	M	M			M	M	M
Implementation of KI decision	3b1	M	M			M	M	M			M	M	M
Implementation of protective actions for special populations - EOCs	3c1			M			M						
Implementation of protective actions for Schools	3c2				M								
Implementation of traffic and access control	3d1	M	M			M	M	M					
Impediments to evacuation are identified and resolved	3d2	M	M			M	M	M					
Implementation of ingestion pathway decisions - availability/use of info	3e1												
Materials for Ingestion Pathway PADs are available	3e2												
Implementation of relocation, re-entry, and return decisions.	3f1												
Field Measurement and Analysis													
Adequate Equipment for Plume Phase Field Measurements	4a1											M	M
Field Teams obtain sufficient information	4a2											M	M
Field Teams Manage Sample Collection Appropriately	4a3										M	M	M
Post plume phase field measurements and sampling	4b1												
Laboratory operations	4c1												
Emergency Notification and Public Info													
Activation of the prompt alert and notification system	5a1								M				
Activation of the prompt alert and notification system - Fast Breaker	5a2												
Activation of the prompt alert and notification system - Exception areas	5a3	M					M						
Emergency information and instructions for the public and the media	5b1								M	M			
Mon / decon of evacuees and emergency workers, and registration of evacuees	6a1												
Mon / decon of emergency worker equipment	6b1												
Temporary care of evacuees	6c1												
Transportation and treatment of contaminated injured individuals	6d1												

Table 2 - Summary of Exercise Evaluation (Continued, page 2/2)

		FMT Charlie	PSLHD	SLCUSD	San Luis Obispo County EOC	PAC	State Parks Field Ops Interview	UDAC	County Fire Station #63	PBEOC	PBPWD	PBPD	KI Storage Facility
DATE: 2008-10-29 SITE: Diablo Canyon Power Plant, A: ARCA, D: Deficiency, M: Met													
Emergency Operations Management													
Mobilization	1a1	M	M		M	M		M	M	M			
Facilities	1b1					M			M	M			
Direction and Control	1c1	M	M		M	M		M	M	M			
Communications Equipment	1d1	M	M		M	M		M	M	M			
Equip & Supplies to support operations	1e1	M	M	M	M	M	M	M	M	M	M	M	M
Protective Action Decision Making													
Emergency Worker Exposure Control	2a1				M			M					
Radiological Assessment and PARs	2b1				M			M					
Decisions for the Plume Phase -PADs	2b2				M								
PADs for protection of special populations	2c1			M	M								
Rad Assessment and Decision making for the Ingestion Exposure Pathway	2d1												
Rad Assessment and Decision making concerning Relocation, Reentry, and Return	2e1												
Protective Action Implementation													
Implementation of emergency worker exposure control	3a1	M	M	M	M		M	M	M	M	M	M	M
Implementation of KI decision	3b1	M	M	M	M		M	M	M	M	M	M	M
Implementation of protective actions for special populations - EOCs	3c1				M				M	M			
Implementation of protective actions for Schools	3c2			M	M								
Implementation of traffic and access control	3d1		M		M		M		M	M	M	M	
Impediments to evacuation are identified and resolved	3d2				M		M			M	M	M	
Implementation of ingestion pathway decisions - availability/use of info	3e1												
Materials for Ingestion Pathway PADs are available	3e2												
Implementation of relocation, re-entry, and return decisions.	3f1												
Field Measurement and Analysis													
Adequate Equipment for Plume Phase Field Measurements	4a1	M											
Field Teams obtain sufficient information	4a2	M						M					
Field Teams Manage Sample Collection Appropriately	4a3	M											
Post plume phase field measurements and sampling	4b1												
Laboratory operations	4c1												
Emergency Notification and Public Info													
Activation of the prompt alert and notification system	5a1				M								
Activation of the prompt alert and notification system - Fast Breaker	5a2												
Activation of the prompt alert and notification system - Exception areas	5a3		M		M		M		A	M		M	
Emergency information and instructions for the public and the media	5b1				M	M							
Mon / decon of evacuees and emergency workers, and registration of evacuees	6a1												
Mon / decon of emergency worker equipment	6b1												
Temporary care of evacuees	6c1												
Transportation and treatment of contaminated injured individuals	6d1												

4.2. Status of Jurisdictions Evaluated

This section provides information on the evaluation of each participating jurisdiction and functional entity, in a jurisdiction based, issues only format. Presented below is a definition of the terms used in this subsection relative to demonstration status.

Met – Listing of the demonstrated exercise evaluation area criteria under which no Deficiencies or ARCAs were assessed during this exercise and under which no ARCAs assessed during prior exercises remain unresolved.

Deficiency – Listing of the demonstrated exercise evaluation area criteria under which one or more Deficiencies were assessed during this exercise. Included is a description of each Deficiency and recommended corrective actions.

Area Requiring Corrective Actions – Listing of the demonstrated exercise evaluation area criteria under which one or more ARCAs were assessed during the current exercise or ARCAs assessed during prior exercises remain unresolved. Included is a description of the ARCAs assessed during this exercise and the recommended corrective action to be demonstrated before or during the next biennial exercise.

Not Demonstrated – Listing of the exercise evaluation area criteria which were not demonstrated as scheduled during this exercise and the reason they were not demonstrated.

Prior ARCAs – Resolved – Descriptions of ARCAs assessed during previous exercises that were resolved in this exercise and the corrective actions demonstrated.

Prior ARCAs – Unresolved – Descriptions of ARCAs assessed during prior exercises that were not resolved in this exercise. Included in the reason the ARCA remains unresolved and recommended corrective actions to be demonstrated before or during the next biennial exercise.

The following are definitions of the two types of exercise issues that are discussed in this report.

A deficiency is defined in the Interim REP Program Manual as "...an observed or identified inadequacy or organizational performance in an exercise that could cause a finding that off-site emergency preparedness is not adequate to provide reasonable assurance that appropriate

protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.”

An ARCA is defined in the Interim REP Program Manual as “...an observed or identified inadequacy of organizational performance in an exercise that is not considered, by itself, to adversely impact public health and safety.”

The Federal Emergency Management Agency (FEMA) Region IX Office has developed a standardized system for numbering exercise issues (Deficiencies and ARCAs). This system is used to achieve consistency in numbering exercise issues among FEMA Regional Offices and site-specific exercise reports within each Region. It is also used to expedite tracking of exercise issues on a nationwide basis.

The identifying number of Deficiencies and ARCAs includes the following elements, with each element separated by a hyphen (-).

Plant Site Identifier – A two-digit number corresponding to the Utility Billable Plant Site Codes.

Exercise Year – The last two digits of the year the exercise was conducted.

Evaluation Area Criterion – A letter and number corresponding to the Evaluation Area criterion.

Issue Classification Identifier – (D = Deficiency, A = ARCA). Only Deficiencies and ARCAs are included in exercise reports.

Exercise Issue Identification Number – A separate two (or three) digit indexing number assigned to each issue identified in the exercise.

4.2.1. California Jurisdictions

4.2.1.1. CHP Field Operations Interview

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.1.2. CALTRANS Field Operations Interview

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.1.3. State Parks Field Operations Interview

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.1.4. State KI Storage Facility

- a. MET: 1.e.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2. Risk Jurisdictions

4.2.2.1. County Health Agency Department Operations Center

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.c.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.2. County Office of Education Department Operations Center

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.c.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.3. County Public Works (Field Operations)

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.4. County Public Works Department Operations Center

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None

- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.5. County Sheriff (Field Operations)

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.6. Joint Information Center

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.7. Off-site Emergency Laboratory

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.8. Off-site Field Monitoring Team Alpha

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.2, 4.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.9. Off-site Field Monitoring Team Bravo

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.2, 4.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.10. Off-site Field Monitoring Team Charlie

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 4.a.1, 4.a.2, 4.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.11. Port San Luis Harbor District

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.d.1, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.12. San Luis Coastal Unified School District

- a. MET: 1.e.1, 2.c.1, 3.a.1, 3.b.1, 3.c.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.13. San Luis Obispo County Emergency Operations Center

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 2.b.2, 2.c.1, 3.a.1, 3.b.1, 3.c.1, 3.c.2, 3.d.1, 3.d.2, 5.a.1, 5.a.3, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: 2.a.1, 3.b.1.

ISSUE NO.: 19-08-2A1-A-01

CRITERION: OROs use a decision-making process to insure that an exposure control system, including the use of KI, is in place for emergency workers including provisions to authorize radiation exposure in excess of admin or PAGs.

CONDITION: The EWEC staff was confused at the separate reporting rates and then the addition of a correction factor of 24. A discussion between the CHO and the EWEC ensued. The CHO was unable to accurately explain the correction factor of 24. He stated that you either multiplied by 24 or divided by 24 but didn't know what numbers to use. He then changed the correction factor to 10, which was incorrect. He did not tell the staff that 10 mRem reading increments included the new correction factor.

POSSIBLE CAUSE: At 1305, the CHO notified the EWEC to tell all FMTs to report readings in increments of 10 mRem. The title of the message was PED TEDE Correction Factor (#793), but no correction factor was provided. At 1318, the EWEC received a message from the CHO stating that the maximum reading without CHO authorization was 50 mRem and a title of Correction Factor 24, but the text of the message did not identify the correction factor (#794).

REFERENCE: NUREG-0654, K.4; J.10.e, f

EFFECT: The EWEC could have mis-calculated the doses for the EWs. The EWs could have received higher doses.

CORRECTIVE ACTION DEMONSTRATED: At 1327, the Controller requested that the CHO redemonstrate issuing a correct Message Form. Message Form #796 was issued at 1328. This message correctly identified the correction factor of 24 and how the 10 mRem increments and 50 mRem maximum dose was arrived at. This information was then relayed to the individual agencies.

ISSUE NO.: 19-08-3b1-A-02

CRITERION: KI and appropriate instructions are available should a decision to recommend use of KI be made. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals (not general public) is maintained. (NUREG-0654, E.7., J.10.e.f.)

CONDITION: At 1243, the CHO received the PAR for FMTs and EWs in PAZ 1 and 2 to ingest KI. UDAC had calculations that showed a 5 Rem exposure at 2 miles. The CHO drafted Message #6248 at 1251 that requested the EWEC to notify all agencies. The EWEC received the message at 1253 and immediately began notifications. At 1309, the EWEC contacted the FMTs and improperly told them that only FMTs in PAZs 1 and 2 should ingest KI.

POSSIBLE CAUSE: The EWEC did not read the Message Form completely.

REFERENCE: NUREG-0654, J.10.E.

EFFECT: FMTs who were required to ingest KI would not have received the message. This could cause unnecessary exposure.

CORRECTIVE ACTION DEMONSTRATED: Upon direction from the Controller, the EWEC redemonstrated issuing the appropriate message. At 1314, the EWEC called the FMTs and clarified that the message was for all FMTs and EWs in PAZs 1 and 2 to ingest KI.

- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES – RESOLVED: None
- f. PRIOR ISSUES – UNRESOLVED – None

4.2.2.14. San Luis Obispo County Phone Assistance Center

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.15. Unified Dose Assessment Center

- a. MET: 1.a.1, 1.c.1, 1.d.1, 1.e.1, 2.a.1, 2.b.1, 3.a.1, 3.b.1, 4.a.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.16. County Fire Station #63

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: 5.a.3.

ISSUE NO.: 19-08-5a3-A-03

CRITERION: Activities associated with FEMA approved exception areas are completed within 45 minutes following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. Backup A&N of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary A&N system. (NUREG-0654, E.6., Appendix 3.B.2.c)

CONDITION: Back-up route alerting was evaluated through discussion. Siren 0601 was simulated as failed. The Fire Captain referred to Checklist 9 to SPO III.32, City of Pismo Beach. Neither a route alerting map nor a siren coverage map was available at the Fire Station. The Fire Captain contacted the Pismo Beach EOC and requested a map. The EOC indicated that they did not have a route alerting map or a siren coverage map. The EOC provided direction to cover the streets uphill of Bello Street. and north of Price Canyon Road.

POSSIBLE CAUSE: There are no new route alerting siren maps available for the upgraded siren system.

REFERENCE: NUREG 0654, Appendix 3, B.2.c; E.6

EFFECT: There is a potential for some members of the general public not to be alerted.

RECOMMENDATION: Provide update siren coverage maps and route alerting maps to the Fire Station and others who have route alerting responsibilities.

- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.17. City of Pismo Beach EOC

- a. MET: 1.a.1, 1.b.1, 1.c.1, 1.d.1, 1.e.1, 3.a.1, 3.b.1, 3.c.1, 3.d.1, 3.d.2, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.18. City of Pismo Beach Public Works Dept (Field Operations)

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.2.19. City of Pismo Beach Police Dept (Field Operations)

- a. MET: 1.e.1, 3.a.1, 3.b.1, 3.d.1, 3.d.2, 5.a.3.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

4.2.3. Private Jurisdictions

4.2.3.1. Emergency Alert System Radio Station

- a. MET: 1.d.1, 5.a.1, 5.b.1.
- b. AREAS REQUIRING CORRECTIVE ACTION: None
- c. DEFICIENCY: None
- d. NOT DEMONSTRATED: None
- e. PRIOR ISSUES - RESOLVED: None
- f. PRIOR ISSUES - UNRESOLVED: None

APPENDIX 1

ACRONYMS AND ABBREVIATIONS

ALARA	As Low As Reasonably Achievable
ARCA	Areas Requiring Corrective Action
ARES	Amateur Radio Emergency Services
CHADOC	County Health Agency Department Operations Center
CHO	County Health Officer
CHP	California Highway Patrol
CLETS	California Law Enforcement Teletype System
DCPP	Diablo Canyon Power Plant
DRD	Direct Reading Dosimeter
EAS	Emergency Alert System
ECL	Emergency Classification Level
EMS	Emergency Medical Services
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EPD	Electronic Personal Dosimeter
EPZ	Emergency Planning Zone
ESC	Emergency Services Coordinator
EWEC	Emergency Worker Exposure Control
FCC	Federal Communication Commission
FMT	Field Monitoring Team
FTC	Field Team Coordinator
GE	General Emergency ECL
HDM	Harbor District Manager
IC	Incident Commander
IPZ	Ingestion Pathway Zone
JIC	Joint Information Center
LPIO	Lead Public Information Officer
LTCO	Long Term Care Ombudsman
NPP	Nuclear Power Plant
NRC	Nuclear Regulatory Commission
OASIS	Operational Area Satellite Information System
OEL	Offsite Environmental Laboratory
PAC	Phone Assistance Center
PAZ	Protective Action Zone
PED	Personal Electronic Dosimeter
PSAP	Public Safety Answering Point
PSLHD	Port San Luis Harbor District
PWD	Public Works Department
RACES	Radio Amateur Civil Emergency Services
REPP	Radiological Emergency Preparedness Program
RMD	Radiological Monitoring Director
SAE	Site Area Emergency Classification Level
SLO	San Luis Obispo

SLOCPHD	San Luis Obispo County Public Health Department
SOP	Standard Operating Procedure
TC	Transportation Coordinator
TEDE	Total Effective Dose Equivalent
UDAC	Unified Dose Assessment Center
WC	Watch Command

APPENDIX 2

EXERCISE EVALUATORS AND TEAM LEADERS

DATE: 2008-10-29, SITE: Diablo Canyon Power Plant,

LOCATION	EVALUATOR	AGENCY
CHP Field Operations Interview	Janet Hlavaty-LaPosa	FEMA RX
CALTRANS Field Operations Interview	Marynette Herndon	ICF
State Parks Field Operations Interview	Terry Blackmon	ICF
State KI Storage Facility	Roy Smith	ICF
County Health Agency Department Operations Center	Ed Snyder	EPA R9
County Office of Education Department Operations Center	Elsa Lopez	FEMA RVI
County Public Works (Field Operations)	Marynette Herndon	ICF
County Public Works Department Operations Center	Marynette Herndon	ICF
County Sheriff (Field Operations)	Paul Nied	ICF
Joint Information Center	*Henry Christiansen Elena Joyner	ICF FEMA RIX
Off-site Emergency Laboratory	Michael Cornell	DOE R7
Off-site Field Monitoring Team Alpha	Jon Fox	ICF
Off-site Field Monitoring Team Bravo	Richard Grundstrom	ICF
Off-site Field Monitoring Team Charlie	Lyle Slagle	ICF
Port San Luis Harbor District	Roy Smith	ICF
San Luis Coastal Unified School District	Gary Bolender	ICF
San Luis Obispo County Emergency Operations Center	Gary Bolender Walter Gawlak Janet Hlavaty-LaPosa Joseph Keller *Wendy Swygert	ICF ICF FEMA RX ICF ICF
San Luis Obispo County Phone Assistance Center	Elena Joyner Paul Nied	FEMA RIX ICF
Unified Dose Assessment Center	William Maier *Daryl Thome	NRC RIV ICF
County Fire Station #63	Terry Blackmon	ICF
City of Pismo Beach EOC	Lorenzo Lewis *James McClanahan	FEMA HQ ICF
City of Pismo Beach Public Works Dept (Field Operations)	James McClanahan	ICF
City of Pismo Beach Police Dept (Field Operations)	James McClanahan	ICF
Emergency Alert System Radio Station	Walter Gawlak	ICF
* Team Leader		

APPENDIX 3

EXERCISE EXTENT-OF-PLAY

The extent-of-play agreement on the following pages were submitted by the County of San Luis Obispo and the State of California, and were approved by FEMA RIX, in preparation for the Off-site Biennial Diablo Canyon Power Plant Exercise held on October 29, 2008.



**STATE OF CALIFORNIA and
SAN LUIS OBISPO COUNTY/CITIES**



**EXTENT OF PLAY AGREEMENT
July 31, 2008**

For the October 29, 2008 Diablo Canyon Power Plant

EVALUATED EXERCISE

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STATE OF CALIFORNIA
EXTENT OF PLAY
Diablo Canyon Power Plant

EVALUATED EXERCISE

October 29, 2008

Acronyms

ARCA	Area Requiring Corrective Action
Caltrans	California Department of Transportation
CDPH.....	California Department of Public Health
CHP.....	California Highway Patrol
COE.....	San Luis Obispo County Office of Education
County OES	San Luis Obispo County OES
CSWC	Calif. State Warning Center
DCPP.....	Diablo Canyon Power Plant
DOC	Department Operations Center
EAS	Emergency Alert System
EOC.....	San Luis Obispo County Emergency Operations Center
EOP	Extent of Play Agreement
EPZ	Emergency Planning Zone
EWEC	Emergency Worker Exposure Control
FEMA	Federal Emergency Management Agency
FMT	Field Monitoring Team
JIC	Joint Information Center
KI	Potassium Iodide
NRC	Federal Nuclear Regulatory Commission
OES	Office of Emergency Services
PAD.....	Protective Action Decision
PAR.....	Protective Action Recommendation
PIO	Public Information Officer
RACES.....	Radio Amateur Civil Emergency Services
REOC.....	State OES Region Emergency Operation Center
SDAC.....	State Dose Assessment Center
SOC.....	State Operations Center
State NPP Plan.....	State of California Nuclear Power Plant Emergency Response Plan
State OES	Governor's Office of Emergency Services
UDAC	Unified Dose Assessment Center

1. PURPOSE, SCOPE & GENERAL CONCEPTS

This extent-of-play agreement addresses participation by State of California agencies and local jurisdictions in the Diablo Canyon Power Plant (DCPP) evaluated-exercise scheduled for October 29, 2008. In order to show continuity among participating agencies, this agreement includes the extent of play by:

- State of California agencies, including the Governor's Office of Emergency Services (State OES) and the California Department of Public Health (CDPH).
- Locally-based State of California agencies, including Calif. Highway Patrol (CHP), Calif. State Parks, and Calif. Dept. of Transportation (Caltrans).
- Local agencies and jurisdictions, including the County of San Luis Obispo (SLO Co.) and participating Departments and Agencies and Cities within the County.

The purpose of this extent-of-play agreement is to present the evaluation areas that will be demonstrated and to identify planned deviations from the implementation of the applicable plans, including the State of California Nuclear Power Plant Emergency Response Plan (State NPP Plan, 2008), the CDPH Nuclear Power Plant Emergency Response Procedures (which are a part of the State NPP Plan), and San Luis Obispo County Nuclear Power Plant Emergency Response Plans and Procedures. The state and local agencies will implement applicable elements in these plans and procedures unless otherwise specified in this agreement.

The goal of the state participation in the exercise is to support local governments in their effort to demonstrate reasonable assurance that the public can be protected during a nuclear power plant emergency. The goal of local agencies and organizations is to demonstrate reasonable assurance that the public can be protected during a nuclear power plant emergency.

Throughout the exercise, real emergencies take priority over exercise play.

The demonstration or exercise phase will terminate when the FEMA lead evaluator and lead exercise controller agree that all required evaluation criteria have been adequately demonstrated and evaluated.

2. AUTHORITIES AND REFERENCES

The purpose of the exercise is to comply with the requirements of 44 CFR 350 and the guidelines of NUREG 0654/FEMA-REP-1. Exercise planners utilized the elements described in the 67 FR 20580 (April 25, 2002) and Interim Radiological Emergency Preparedness (REP) Program Manual (August 2002), to develop the extent of play.

3. RE-DEMONSTRATION AND IN-PLAY INTERVIEWS

Areas requiring corrective action may be immediately corrected and re-evaluated during the exercise or immediately following, providing that the re-demonstration is not disruptive, does not interrupt the flow of the exercise, and does not affect other evaluation areas. During demonstrations conducted out-of-sequence, the Evaluator may have the participants re-demonstrate an activity that is determined to be not satisfactorily demonstrated. Immediate training prior to the re-demonstration may be allowed, again provided that the training and re-demonstration are not disruptive, do not interrupt the flow of the exercise, and do not affect other evaluation areas. If the re-demonstration is performed correctly, the Evaluator will document the issue of concern, with a statement that the issue was corrected during the exercise. If the demonstration is still performed unsuccessfully, the issue will be documented and referred to the RAC Chair to determine the appropriate classification of the issue.

Evaluation areas that are not demonstrated due to scenario play may be done through interview during or immediately following the exercise. The evaluator may interview players to determine sequence of events or actions that would have been taken if scenario had been different. Evaluator interview of players should not be disruptive nor interrupt flow of the exercise.

4. OUTSTANDING ISSUES

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The last FEMA-evaluated plume-phase and ingestion pathway exercise at Diablo Canyon Power Plant was held on October 25, 2006. There were no deficiencies at that exercise. There was one Area Requiring Corrective Action (ARCA), which was corrected during that exercise.

5. EXTENT OF PLAY

5.1 Overview of Extent of Play

The following Extent of Play (EOP) has been developed with state and local jurisdictions involved in the planning and response to Diablo Canyon Power Plant emergencies. This EOP represents the level of participation and any limitations on the demonstration of Emergency Preparedness Evaluation Area Elements by the participating agencies and organizations. The Emergency Preparedness Evaluation Areas – the elements and sub-elements – for this exercise are those that are required to be demonstrated in every exercise, as required by the *Interim REP Program Manual (August 2002)*.¹ Copies of applicable plans and procedures have been provided to FEMA, Region IX staff.

5.2 NRC Participation

¹ See Table 4 – Federal Evaluation Process Matrix for minimum frequency of specific evaluation areas and sub-elements. See also 67 FR 20602, Table 2 (April 25, 2002).

Nuclear Regulatory Commission Region IV will participate in the Diablo Canyon Power Plant exercise with approximately 20 people on the "Site Team," which will pre-stage near the plant for the exercise. The NRC also will participate with a team in its Region IV office in Arlington, TX. For further information about the NRC participation, please refer to the appropriate NRC representative.

5.3 Evaluation Criteria

Table 1 shows the emergency Preparedness Elements that are required to be demonstrated in the October 29, 2008 Diablo Canyon Power Plant exercise, along with the level of demonstration that will be displayed in the exercise (i.e., fully demonstrated, limited demonstration, simulated, out-of-sequence interviews, not demonstrated, or courtesy evaluation only). Each deviation from full demonstration is described in this EOP agreement.

Table 1 includes all offsite state and local agencies and organizations that will participate in the exercise. Following Table 1, specific information about limitations on extent of play and demonstration of exercise criteria is presented. In general, any portions of the exercise evaluation areas to be demonstrated that require interaction with the general public will be simulated.

Simulation and out-of-sequence interview: The CHP will provide representatives at the San Luis Obispo County EOC Command Table and in the Operations Room to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a field supervisor and CHP Officer who will be interviewed out-of-sequence. All activities that would otherwise be performed by the CHP (e.g., providing traffic control during an evacuation) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The Calif. State Parks will provide a representative to the San Luis Obispo County EOC in the Operations Room to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Supervisor and Park Ranger who will be interviewed out-of-sequence. All activities that would otherwise be performed by the Calif. State Parks (e.g., evacuating state beaches) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The Caltrans will provide a representative to the San Luis Obispo County EOC Operations Room to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Supervisor and a member of a field crew who will be interviewed out-of-sequence. All activities that would otherwise be performed by Caltrans (e.g., placing barricades at traffic control points, at perimeter control points and assisting the CHP in directing and controlling traffic) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The San Luis Obispo County Sheriff's Department will provide a representative to the San Luis Obispo County EOC Command Table and in the Operations Room to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Supervisor and a deputy who will be interviewed out-of-sequence. All activities that would otherwise be performed by the Sheriff's Department (e.g., providing traffic control during an evacuation) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The San Luis Obispo County Public Works Department will provide a representative to the San Luis Obispo County EOC Operations Room and staff the Public Works Department Operations Center to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Supervisor and a member of a field crew who will be interviewed out-of-sequence. All activities that would otherwise be performed by Public Works (e.g., placing barricades at traffic control points, at perimeter control points and assisting the Sheriff's Department in directing and controlling traffic) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The City of Pismo Beach Police Department will provide representatives to the City EOC to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Commander and an Officer who will be interviewed out-of-sequence. All activities that would otherwise be performed by the Police Department (e.g., providing traffic control during an evacuation) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

Simulation and out-of-sequence interview: The City of Pismo Beach Public Works Department will provide a representative to the City EOC to participate in the evaluated portion of the exercise. In addition questions about specific criterion may be presented to a Supervisor and a member of a field crew who will be interviewed out-of-sequence. All activities that would otherwise be performed by Public Works (e.g., placing barricades at traffic control points, at perimeter control points and assisting the Police Department in directing and controlling traffic) will be simulated. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

TABLE 1

OVERVIEW OF EXTENT OF PLAY – STATE & LOCAL AGENCIES

Codes for Table 1:
 DElement will be fully demonstrated.
 IElement will be demonstrated by interview.
 LElement will be demonstrated with limitations that are described in this EOP.
 C.....Courtesy evaluation only.

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EVALUATED ORGANIZATION	Emergency Operations Management										Protective Action Decision-Making				Protective Action Implementation				Field Measurement and Analysis				Emergency Notif & Public Information		
	1.a.1	1.b.1	1.c.1	1.d.1	1.e.1	2.a.1	2.b.1	2.b.2	2.c.1	3.a.1	3.b.1	3.c.1	3.c.2	3.d.1	3.d.2	4.a.1	4.a.2	4.a.3	5.a.1	5.a.3	5.b.1				
San Luis Obispo County, Local Jurisdictions & Agencies, and Locally-Based State Agencies	D		D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D	D			
EOC																									
UDAC																									
FMTs																									
JIC																									
Phone Assistance Center																									
Public Works Dept. DOC																									
Health Agency DOC																									
County Office of Education DOC																									
Shell Beach Fire Station 63																									
EAS Station																									
San Luis Coastal Unified Schools																									
Port San Luis Harbor District																									
Offsite Environmental Laboratory																									

TABLE 1

OVERVIEW OF EXTENT OF PLAY – STATE & LOCAL AGENCIES

Codes for Table 1:
 DElement will be fully demonstrated.
 IElement will be demonstrated by interview.
 LElement will be demonstrated with limitations that are described in this EOP.
 C.....Courtesy evaluation only.

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	1.a.1	1.b.1	1.c.1	1.d.1	1.e.1	2.a.1	2.b.1	2.b.2	2.c.1	3.a.1	3.b.1	3.c.1	3.c.2	3.d.1	3.d.2	4.a.1	4.a.2	4.a.3	5.a.1	5.a.3	5.b.1
	Mobilization	Facilities	Direction & Control	Communications Equipment	Equipment & Supplies to Support Operations	Emergency Worker Exposure Control	Rad Assmt PARs Based on Available Info	Rad Assmt PADs for the General Public	Prot Action Decisions for Special Populations	Implem. of Emerg Worker Exposure Control	Implementation of KI Decision	Implementation of PADs - Special Populations	Implementation of PADs for Schools	Implementation of Traffic and Access Control - Accurate Instructions are Provided	Implementation of Traffic and Access Control - Impediments are Identified & Resolved	Field Measurements and Analysis (Plume Phase) - Field Teams are Equipped	Field Measurements and Analysis (Plume Phase) - Field Teams are Managed	Field Measurements and Analysis (Plume Phase) - Field Team Procedures	Activation of the Prompt Alert and Notification System - Initial	Activation of the Prompt Alert and Notification System - Exception Areas	Emergency Information and Instructions for the Public and the Media
County Sheriff (Field Ops)					I					I	I			I	I					I	
County Public Works (Field Ops)					I					I	I			I	I						
City of Pismo Beach	D	D	D	D	D					D	D	D		D	D					D	
City of Pismo Beach Police Dept (Field Ops)					I					I	I			I	I					I	
City of Pismo Beach Public Works (Field Ops)					I					I	I			I	I						
City of San Luis Obispo	C	C	C	C	C					C	C	C	C	C	C					C	
“Locally-Based” State Agencies																					
Caltrans (Field Ops)					I					I	I			I	I						
CHP (Field Ops)					I					I	I			I	I					I	
Calif. State Parks (Field Ops)					I					I	I			I	I					I	
State Agencies @ County EOC																					
Calif. OES - Agency Rep.	L	D	D	L	L						L										
State Agencies @ UDAC																					
Calif. OES	L	D	D	D	D																
Calif. Dept. Public Health	L	D	D	D	D		D														

TABLE 1

OVERVIEW OF EXTENT OF PLAY – STATE & LOCAL AGENCIES

Codes for Table 1:
 DElement will be fully demonstrated.
 IElement will be demonstrated by interview.
 LElement will be demonstrated with limitations that are described in this EOP.
 C.....Courtesy evaluation only.

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	1.a.1	1.b.1	1.c.1	1.d.1	1.e.1	2.a.1	2.b.1	2.b.2	2.c.1	3.a.1	3.b.1	3.c.1	3.c.2	3.d.1	3.d.2	4.a.1	4.a.2	4.a.3	5.a.1	5.a.3	5.b.1
Mobilization		Facilities	Direction & Control	Communications Equipment	Equipment & Supplies to Support Operations	Emergency Worker Exposure Control	Rad Assmt PARs Based on Available Info	Rad Assmt PADs for the General Public	Prot Action Decisions for Special Populations	Implem. of Emerg Worker Exposure Control	Implementation of KI Decision	Implementation of PADs - Special Populations	Implementation of PADs for Schools	Implementation of Traffic and Access Control - Accurate Instructions are Provided	Implementation of Traffic and Access Control - Impediments are Identified & Resolved	Field Measurements and Analysis (Plume Phase) - Field Teams are Equipped	Field Measurements and Analysis (Plume Phase) - Field Teams are Managed	Field Measurements and Analysis (Plume Phase) - Field Team Procedures	Activation of the Prompt Alert and Notification System - Initial	Activation of the Prompt Alert and Notification System - Exception Areas	Emergency Information and Instructions for the Public and the Media
State Agencies @ JIC																					
Calif. OES	L			D	D	D															D
Calif. Dept. Public Health	L			D	D	D															D
CHP	L			D	D	D															D
Calif. State Parks	L			D	D	D															D
State Agencies - KI																					
Calif. OES					I																

For a more complete description of the exercise evaluation areas and any limitations, see the narrative in the remainder of the EOP document.

5.4. Demonstration of Exercise Criteria – Limitations Described

5.4.1 Exercise Evaluation Area 1 – Emergency Operations Management

5.4.1.1 Criterion 1.a.1: Mobilization of Emergency Personnel – Demonstrate the ability to use effective procedures to alert, notify, and mobilize emergency personnel and activate facilities in a timely manner. (NUREG-0654: A.4, D.3, 4; E.1, 2; H.4)

Outstanding Issues: None

Limitations:

- Personnel that must travel to participate will be staged at a location near their response facility, and will respond once they have received proper notification. This will be limited to the following: CDPH staff to the JIC and the UDAC, State OES staff to the EOC/EOF, UDAC, and JIC.
- The OES Southern Region will provide two staff to the San Luis Obispo County EOC to represent the OES Southern Region, assist with coordination, communication, intel gathering, and support of the San Luis Obispo County Health Officer with KI coordination, as needed. One of these personnel may be staged at a location near their response facility prior to the start of play, and will respond once they have received proper notification.
- The Calif. State Warning Center (CWSC) at OES is a 24-hour a day, seven-day a week facility. Personnel will be at their normally assigned work stations, and they will implement the State NPP Plan notification SOP.
- State personnel responding to the exercise will be notified to be activated by the CSWC using the State NPP Plan notification SOP.
- Participation of the CDPH Department Operations Center (DOC) will be simulated. The CDPH DOC will not be activated or evaluated during this exercise. The primary responsibilities of this facility during the emergency phase are to dispatch CDPH personnel, to establish communications with the JIC, to receive information from staff at the UDAC and JIC, and provide support, if needed. Response to requests from CDPH involved in the exercise will be simulated to facilitate the conduct of the exercise. The simulation player(s) will be located in Sacramento. CDPH personnel participating at the exercise will be pre-staged and CDPH personnel at the UDAC in the San Luis Obispo County EOC will simulate communications by transmitting information to the CDPH DOC, as needed.
- The State Dose Assessment Center will not participate in this exercise as it normally does not become involved until the post-plume, ingestion phase.
- The CDPH Sanitation and Radiation Laboratory will not participate in this exercise as it does not become involved until the post-plume, ingestion phase.
- Setup of COE ARES/RACES station facilities is done pre-exercise to facilitate timely ORO demonstration and FEMA evaluation of pertinent exercise criteria.
- The Santa Barbara County representative and National Weather Service staff exercise participants will pre-stage and receive notifications through their agencies normal procedure (i.e., pager, telephone, cell phone).

- The City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.1.2 Criterion 1.b.1: Facilities – Demonstrate the facilities are sufficient to support the emergency response. (NUREG-0654: H.3)

Outstanding Issues: None

Level of Participation & Limitations – State Facilities: The following state facilities have an identified role in a nuclear power plant incident. Participation and limitations are described below.

Level of Participation & Limitations – State Facilities	
State Facility	Limitations on Play
State Operations Center (SOC) State Office of Emergency Services 3650 Schriever Avenue Mather, CA 95655	The SOC will not be activated or evaluated during this exercise.
Southern Region Emergency Operations Center (Southern REOC) State Office of Emergency Services 11200 Lexington Dr., AFRC Bldg 283 Los Alamitos, CA 90720-5005	The Southern REOC will not be activated or evaluated during this exercise
State of California Joint Information Center 3650 Schriever Avenue Mather, CA 95655	The State Joint Information Center will not be activated or evaluated during this exercise.
Calif. State Warning Center (CSWC) 3650 Schriever Avenue Mather, CA 95655	This facility will conduct State NPP Plan notifications in accordance with the appropriate SOP to facilitate the conduct of the exercise. The CSWC will not be evaluated during this exercise.
California Department of Public Health Operations Center (CDPH DOC) 1615 Capitol Avenue Sacramento, CA 95814	The CDPH DOC will not be activated or evaluated during this exercise. The activities of the CDPH DOC, including calls for activation of staff, establishing communications with the JIC, receiving information from the staff at the UDAC and JIC, and responding to requests from CDPH staff involved in the exercise will be simulated to facilitate the conduct of the exercise. The simulation player(s) will be located in Sacramento.

Level of Participation & Limitations – San Luis Obispo County Facilities: The following San Luis Obispo County facilities have an identified role in a nuclear power plant incident, but their role in this exercise will be limited as described below. County emergency facilities that are not limited as described below will participate as described in the appropriate emergency procedures.

The Joint Information Center and Phone Assistance Center will be remodeled prior to the exercise and will be available for evaluation of the facility during the exercise. Arrangements can be made to evaluate the facility out-of-sequence, if that is the preference of the evaluator.

The City of Pismo Beach’s EOC will be available for evaluation of the facility during the exercise. Arrangements can be made to evaluate the facility out-of-sequence, if that is the preference of the evaluator.

Level of Participation & Limitations – County Facilities	
County Facility	Limitations on Play
County Office of Education (COE) 3350 Education Drive San Luis Obispo, CA 93405	ARES/RACES amateur radio operators will set up back-up communications equipment in the COE prior to the exercise. Following active evaluation at the COE, RACES may discontinue operations prior to exercise termination and move personnel to participate in other non-evaluated amateur radio activities.

Level of Participation & Limitations – City of San Luis Obispo Facilities: The emergency facilities at the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.1.3 Criterion 1.c.1: Direction and Control – Key personnel with leadership roles demonstrate the ability to direct, coordinate, and control emergency operations. (NUREG-0654: A.1.d, A.2.a,b)

Outstanding Issues: None

Limitations:

- The direction and control of the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.1.4 Criterion 1.d.1: Communications Equipment – Demonstrate the ability to communicate with all appropriate locations, organizations and field personnel. At least two communication systems are available, at least one operates properly, and communication links are established and maintained with appropriate locations. Communications capabilities are managed in support of emergency operations. (NUREG-0654: F.1, 2)

Outstanding Issues: None

Limitations:

- The Local EAS broadcast system will not be activated for this exercise. An EAS operator will read the messages, and activation of the system will be simulated only.
- An interview with an EAS radio station representative and a station engineer will address communications equipment. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- Various ARES/RACES volunteers will participate in the exercise and staff a number of facilities providing back-up communications as needed. ARES/RACES will also utilize the exercise for training activities that are not a part of the evaluation. ARES personnel may cease non-essential operations at one or more facilities or for purposes of relocation to another facility.
- The communications equipment at the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.1.5 Criterion 1.e.1: Equipment and Supplies to Support Operations – Demonstrate that equipment, maps, displays, dosimetry, potassium iodide, and

other supplies are sufficient to support emergency operations. (NUREG-0654: H.7, 10; J.10.a,b,e; J.11; K.3.a)

Outstanding Issues: None

Limitations:

- Representatives of the San Luis Coastal Unified School District, the Bellevue-Santa Fe School principal, San Luis Obispo County Sheriff, San Luis Obispo County Public Works, Caltrans, CHP, Calif. State Parks, and the City of Pismo Beach will be available for out-of-sequence interviews to demonstrate equipment not demonstrated during exercise play. See Table 2. Specific information about the time, location, and identification of persons participating in the inventory will be provided separately.
- The potassium iodide stockpile(s) for the general public may be inspected and inventoried out-of-sequence. See Table 2. Specific information about the time, location, and identification of persons participating in the inventory will be provided separately.
- The equipment and supplies to support operations at the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.2 Exercise Evaluation Area 2 – Protective Action Decision Making

5.4.2.1 Criterion 2.a.1: Emergency Worker Exposure Control – Demonstrate a relevant decision-making process and coordination to ensure emergency worker exposure control, including the use of KI and provisions to authorize exposure in excess of administrative limits or protective action guides. (NUREG-0654: J.10.e,f; K.4)

Outstanding Issues: None.

Limitations:

- The ingestion of potassium iodide will be simulated.
- Exercise play will address EWEC/KI decision-making and communication. A CHO interview during play will address emergency workers reaching exposure limits.
- Dose records for offsite emergency workers including field monitoring team members are tracked by the emergency worker and the information relayed to their appropriate agency command center. The command centers will send exposure reports to the EWEC Desk in the San Luis Obispo County EOC. The County Health Officer is advised of off-site dose exposure as specified in plans and procedures. EWEC desk activity will be driven by simulator messages and faxes from participating command centers and the SimCell.

5.4.2.2 Criterion 2.b: Radiological Assessment and Protective Action Recommendations and Decisions

Criterion 2.b.1: Appropriate protective action recommendations are based on available information on plant conditions, field monitoring data, and licensee and

ORO dose projections, as well as knowledge of onsite and offsite environmental conditions. (NUREG-0654: I.8, 10; Supp. 3)

Criterion 2.b.2: A decision-making process involving consideration of appropriate factors and necessary coordination is used to make protective action decisions for the general public (including the recommendation for the use of KI, if ORO policy). (NUREG-0654: J.9; J.10.f,m)

Outstanding Issues: None

Limitations:

- Backup manual dose calculations will not be demonstrated unless an actual failure of the primary system and drill feed data occurs.

5.4.2.3 Criterion 2.c: Protective Action Recommendations for Special Populations

Criterion 2.c.1: Demonstrate decision-making necessary to implement appropriate protective actions for special populations (NUREG-0654: J.9; J.10.d, e)

Outstanding Issues: None

Limitations:

San Luis Coastal Unified School District representative District and the Bellevue-Santa Fe school principal will demonstrate the decision-making process of protective actions for school populations within that district by interview. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

5.4.3 Exercise Evaluation Area 3 – Protective Action Implementation

5.4.3.1 Criterion 3.a.1: Implementation of Emergency Worker Exposure Control – Demonstrate the capability to issue appropriate dosimetry and procedures, and manage radiological exposure to emergency workers. Demonstrate ability to read dosimetry and record readings appropriately. (NUREG-0654: K.3.a,b)

Outstanding Issues: None.

Limitations:

- Out-of-sequence interview: Representatives from CHP, Caltrans, Calif. State Parks, San Luis Obispo County Public Works, San Luis Obispo County Sheriff's Department, City of Pismo Beach Police Dept. and Public Works, San Luis Coastal Unified School District, and the Bellevue-Santa Fe school principal will participate in an out-of-sequence interview to demonstrate knowledge of exposure limits and dosimetry. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- The EWEC implementation by the City of San Luis Obispo will be appraised for a courtesy evaluation only

5.4.3.2 Criterion 3.b.1: Implementation of Potassium Iodide Decision –

Demonstrate the capability and resources to implement potassium iodide (KI) protective actions for emergency workers and institutionalized individuals. Appropriate record keeping of the administration of KI for emergency workers and institutionalized individuals (not the general public) is maintained. (NUREG-0654: J.10.e)

Outstanding Issues: None.

Limitations:

- Response to requests for State assistance will be discussed and simulated during exercise play. If required by the scenario or exercise play, the Southern REOC participant's at the SLO County EOC will receive and simulate fulfilling a request to deliver KI to the San Luis Obispo County Reception Centers. KI will not be physically transported to the Reception Centers.
- Emergency responders working in the jurisdiction will follow the protective action recommendations of that jurisdiction and will simulate taking KI as recommended by the jurisdictions' Health Officer or other appropriate authority.
- There are no institutionalized individuals in the 10-mile EPZ. Therefore ingestion of KI by institutionalized persons will not be demonstrated or simulated.
- Out-of-sequence interview: Representatives from CHP, Caltrans, Calif. State Parks, San Luis Obispo County Public Works, City of Pismo Beach Police Dept. and Public Works, San Luis Obispo County Sheriff's Department and San Luis Coastal Unified School District, and the Bellevue-Santa Fe school principal will participate in an out-of-sequence interview to demonstrate knowledge of KI ingestion orders. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- Ingestion of KI is simulated.
- Distribution of KI to the general public will not be demonstrated.
- The implementation of the KI decision by the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.3.3 Criterion 3.c: Implementation of Protective Actions for Special Needs Populations

Criterion 3.c.1: Special Needs Populations Other Than Schools – Demonstrate protective action implementation in impacted areas for special populations other than schools. (NUREG-0654: J.10.c,d,g)

Outstanding Issues: None

Limitations:

- Shell Beach Fire Station 63 representatives will discuss and demonstrate familiarity with the current special needs list and procedure in an interview during exercise play or out-of-sequence. The special needs list may be

reviewed at Fire Station 63 or at the EOC. Individuals on the list will not be contacted.

- San Luis Obispo County Public Works Department Operations Center staff will address the transportation needs of the car-less population through the simulated dispatch of buses in coordination with the Transportation Manager in the San Luis Obispo County EOC in an interview during exercise play or out-of-sequence. NOTE: The San Luis Obispo County Public Works Department Operations Center supports the Transportation Manager on as needed basis. For out-of sequence interview, see Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- The implementation of protective actions for special needs populations by the City of San Luis Obispo will be appraised for a courtesy evaluation only.

Criterion 3.c.2: Implementation of Protective Actions for Schools – Demonstrate the capability and resources necessary to implement protective action decisions for schoolchildren within the plume pathway emergency planning zone. (NUREG-0654: J.10.c,d,g)

Outstanding Issues: None

Limitations:

- San Luis Coastal Unified School District will participate in an interview to include a district superintendent, a teacher, and principal and bus driver or transportation manager, and the Bellevue-Santa Fe school principal. The interview process will demonstrate San Luis Coastal Unified School District familiarity with the process of handling school populations during a DCPD event including the post-emergency phase relocation and return of students in impacted areas. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- School children will not be loaded onto buses.
- School children will not be moved to relocation areas during this drill.

5.4.3.4 Criterion 3.d: Implementation of Traffic and Access Control

Criterion 3.d.1: Demonstrate appropriate traffic and access control for evacuated and sheltered areas. Accurate instructions are provided to traffic and access control personnel. (NUREG-0654: J.10.g,j)

Outstanding Issues: None

Limitations:

- The Port San Luis Harbor District, Shell Beach Fire Station 63, City of Pismo Beach Police Department and Public Works, CHP, Caltrans, Calif. State Parks, San Luis Obispo County Sheriff, and San Luis Obispo County Public Works will address evacuation, access control and traffic impediments during the drill and/or during their out-of-sequence interviews. Field activity and play is simulated.

- Actual road blocks, traffic control, and evacuations will not occur.
- The implementation of traffic and access controls by the City of San Luis Obispo will be appraised for a courtesy evaluation only.

Criterion 3.d.2: Demonstrate identification and resolution of impediments to evacuation. (NUREG-0654: J.10.k)

Outstanding Issues: None

Limitations:

- During the out-of-sequence interviews, San Luis Obispo County Sheriff's Department, San Luis Obispo County Public Works, City of Pismo Beach Police Department and Public Works, Caltrans, Calif. State Parks and CHP will address the resolution of identified impediments to evacuation during the emergency phase of the exercise. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- The identification and resolution of evacuation impediments by the City of San Luis Obispo will be appraised for a courtesy evaluation only.

5.4.4 Exercise Evaluation Area 4 – Field Measurement and Analysis

5.4.4.1 Criterion 4.a: Plume Phase Field Measurements and Analysis –

Demonstrate the capability to deploy field teams with the equipment, methods, and expertise necessary to determine the location of airborne radiation and particulate deposition on the ground from an airborne plume. Demonstrate the capability to use field teams within the plume EPZ to detect airborne radioiodine in the presence of noble gases and to detect radioactive particulates in the airborne plume.

Criterion 4.a.1: Demonstrate that the field teams are equipped to perform field measurements of direct radiation exposure (cloud and ground shine) and to sample airborne radioiodine and particulates. (NUREG-0654: H.10; I.7, 8, 9).

Outstanding Issues: None

Limitations:

- A Field Team member will demonstrate donning and doffing of protective clothing at a convenient time during the exercise; however protective clothing will not be worn during the exercise.
- Carbon mask filters will be used by San Luis Obispo County for this exercise.

Criterion 4.a.2: Demonstrate field monitoring teams are managed to obtain sufficient information to help characterize the release and to control radiation exposure. (NUREG-0654: I.8, 11; J.10.a; H.12).

Outstanding Issues: None

Limitations: None

Criterion 4.a.3: Demonstrate that ambient radiation measurements are made and recorded at appropriate locations, and radioiodine and particulate samples are collected. Demonstrate field gathering, analysis and communication of field data in a timely manner using the appropriate SOP. (NUREG-0654: I.9)

Outstanding Issues: None

Limitations:

- The SimCell function supplies all simulated exercise data.

5.4.5 Exercise Evaluation Area 5 – Emergency Notification and Public Information

5.4.5.1 Criterion 5.a.1 – Activation of the Initial Prompt Alert and Notification

System – Demonstrate that activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite emergency officials to notify the public of an emergency situation. The initial instructional message to the public must include as a minimum the elements required by current FEMA REP guidance. (10 CFR Part 50, Appendix E.IV.D & NUREG-0654: E.5, 6, 7)

Outstanding Issues: None

Limitations:

- During this drill the following activities will be simulated: sounding of sirens, activation of tone alert radios, and delivery of EAS messages to stations.
- Drill play includes use of pre-scripted local EAS messages that will be read but not delivered.
- An interview with one EAS radio station representative and station engineer will address EAS activation, notification, and public information. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

5.4.5.2 Criterion 5.a.3 – Activation of the Prompt Alert and Notification System in

Exception Areas – Demonstrate the capability to accomplish primary alerting and notification of the exception area within 45 minutes following the initial decision by authorized off-site emergency officials to notify the public of an emergency situation. Backup alert and notification of the public is completed within 45 minutes following the detection by the ORO of a failure of the primary alert and notification system. (NUREG-0654: E.6, Appendix 3.B.2.c)

Outstanding Issues: None

Limitations:

- Backup public alerting procedures will be discussed with a San Luis Obispo County Sheriff's Representative in the Operations Room, the Port San Luis Harbor District, and Shell Beach Fire Station 63 during exercise play. The criterion will be demonstrated during out-of-sequence interviews with the San Luis Obispo County Sheriff's Department, City of Pismo Beach Police Department, CHP, and Calif. State Parks representatives. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.
- Backup alerting will not be field demonstrated.
- The activation of the prompt alert and notification in exception areas by the City of San Luis Obispo will be simulated, and will be appraised for a courtesy evaluation only.

5.4.5.3 Criterion 5.b.1 – Emergency Information and Instructions for the Public and Media – Demonstrate the capability to provide clear, accurate, and timely emergency information and instructions to the public and the news media. (NUREG-0654: E.5, 7; G.3.a; G.4c)

Outstanding Issues: None.

Limitations:

- An interview with one EAS radio station representative and station engineer will address EAS activation, notification, and public information. See Table 2. Specific information about the time, location, and identification of persons participating in the interview will be provided separately.

5.5. Sub-Elements Not Demonstrated

The following sub-elements will not be demonstrated in this exercise. These areas will be demonstrated in separate exercises, as stated in the six-year cycle:

2.d.1, 2.e.1, 3.e.1, 3.e.2, 3.f.1, 4.b.1, 4.c.1, 6.a.1, 6.b.1, 6.c.1, 6.d.1.

5.6. Interviews and Demonstrations

Table 2 shows the emergency preparedness elements that will be demonstrated by interview. The interviews and demonstrations may take place during the exercise if it does not interfere with exercise play or during a pre-arranged, out-of-sequence interview. Limitations on the demonstrations and interviews are described in section 5.4 of this document. Specific information about the times, dates, locations, and identification of persons participating in out-of-sequence interviews and demonstrations will be provided to the evaluators before the exercise under separate cover.

Table 2

Schedule for Interviews and Demonstrations

Evaluation Element	Description	Agency	Time/Date/Location/ Contact Person (Details to be Provided)
1.d.1 – Communications Equipment	Demonstration and evaluation of emergency communications equipment.	EAS Radio Station	October 30
1.e.1 – Equipment & Supplies	Emergency Worker Equipment and Supplies	San Luis Coastal Unified School District Bellevue-Santa Fe School San Luis Obispo County Sheriff's Dept. San Luis Obispo County Public Works Caltrans CHP Calif. State Parks City of Pismo Beach Police Dept. City of Pismo Beach Public Works	October 30, a.m. October 30, p.m. October 30, p.m.
52	The potassium iodide stockpile(s) will be inspected and inventoried.	State OES	Northern KI stockpile : October 27 at 1400 Southern KI stockpile: (tbd)
2.c.1 – PARs for Special Populations (Schools)	Demonstrate the decision making process of protective actions for school populations.	San Luis Coastal Unified School District Bellevue-Santa Fe School San Luis Coastal Unified School District Bellevue-Santa Fe School	Ben Tong, State OES, 916-845-8797 October 30, a.m. October 30, a.m. October 30, a.m.
3.a.1 – EWEC Exposure Control (Exposure Limits & Dosimetry)	Demonstrate knowledge of exposure limits and dosimetry.	San Luis Obispo County Sheriff's Dept. San Luis Obispo County Public Works Caltrans CHP Calif. State Parks City of Pismo Beach Police Dept. City of Pismo Beach Public Works	October 30, a.m. October 30, p.m. October 30, p.m.

Evaluation Element	Description	Agency	Time/Date/Location/ Contact Person (Details to be Provided)
3.b.1 – Implementation of Potassium Iodide Decision (KI Ingestion)	Demonstrate knowledge of KI ingestion orders.	San Luis Coastal Unified School District Bellevue-Santa Fe School San Luis Obispo County Sheriff's Dept. San Luis Obispo County Public Works Caltrans CHP Calif. State Parks City of Pismo Beach Police Dept. City of Pismo Beach Public Works	October 30, a.m. October 30, p.m. October 30, p.m.
3.c.1 – Implementation of PADS for Special Populations	Address the transportation needs of the car-less population through the simulated dispatch of buses in coordination with the Transportation Manager in the San Luis Obispo County EOC.	San Luis Obispo County Public Works	October 30, a.m.
3.c.2 – Implementation of PADS for Schools	Demonstrate familiarity with the process of handling school populations during a DCPD event including the post-emergency phase relocation and return of students in impacted areas.	San Luis Coastal Unified School District Bellevue-Santa Fe School Caltrans Calif. State Parks	October 30, a.m. October 30, a.m. October 30, a.m. October 30, a.m.
3.d.1 – Implementation of Traffic & Access Control/Accurate Instructions	Address evacuation, access control and traffic impediments during drill or during interviews scheduled for other evaluation criteria.	San Luis Obispo County Public Works San Luis Obispo County Sheriff's Dept. CHP City of Pismo Beach Police Dept. City of Pismo Beach Public Works San Luis Obispo County Sheriff's Dept. San Luis Obispo County Public Works Caltrans Calif. State Parks CHP City of Pismo Beach Police Dept. City of Pismo Beach Public Works	October 30, a.m. October 30, a.m. October 30, a.m. October 30, a.m. October 30, a.m. October 30, p.m. October 30, p.m. October 30, a.m. October 30, a.m.
3.d.2 – Identify and Resolve Impediments to Evacuation	Address the resolution of identified impediments to evacuation during emergency phase of the exercise.	San Luis Obispo County Sheriff's Dept. San Luis Obispo County Public Works Caltrans Calif. State Parks CHP City of Pismo Beach Police Dept. City of Pismo Beach Public Works	October 30, a.m. October 30, a.m. October 30, a.m. October 30, a.m. October 30, a.m. October 30, p.m. October 30, p.m. October 30, a.m. October 30, p.m. October 30, p.m.

Evaluation Element	Description	Agency	Time/Date/Location/ Contact Person (Details to be Provided)
5.a.1 – Activation of Initial Prompt Alert and Notification	Address EAS activation, notification, and public information.	EAS Radio Station	October 30, a.m.
5.a.3 – Activation of Prompt Alert & Notification System/Exception Areas	Discuss backup public route alerting procedures discussed during exercise or during interviews.	Calif. State Parks San Luis Obispo County Sheriff's Dept. City of Pismo Beach Police Dept. CHP	October 30, a.m. October 30, a.m. October 30, p.m. October 30, a.m.
5.b.1 – Emergency Information and Instructions to the Public and Media	Address emergency information and instructions to the public.	EAS Radio Station	October 30, a.m.

APPENDIX 4

SCENARIO

This appendix contains a summary of the simulated sequence of events -- Scenario -- that were used as the basis for invoking emergency response actions by OROs in the Off-site Biennial Diablo Canyon Power Plant Exercise held on October 29, 2008.

This scenario was submitted by the Diablo Canyon Power Plant, the County of San Luis Obispo and the State of California, and was approved by FEMA RIX.

Diablo Canyon Power Plant Emergency Planning Scenario Synopsis / Event Description

2008 Evaluated Exercise - Team Bravo

10/29/2008

Time	Event Name	Event Description	Classifications
6:00	Initial Conditions and Turnover	<p>Pre-Drill Conditions: A wildland fire in the hills surrounding Avila Beach occurred during August 24-25, 2008. Most vegetation in the area was burned/destroyed.</p> <p>Initial Conditions - Weather: A storm moving south with 25-46 mph winds and little warning blew onto the central coast at 1900 on October 28, 2008. The storm has dropped six-inches of rain as of 0645 today. Flooding occurred around 0530 on Avila Beach Road at Sycamore Hot Springs making the road impassable at that location. The DCPD Watch Commander has been in contact with SLO Sheriff and Highway Patrol for updates on road conditions and has provided a recording for the Plant Status line at 545-2800. At 0645, a plant-wide PA announcement was made for employees leaving the plant to be careful driving home due to deteriorating road conditions.</p> <p>As a result of the storm, the DCPD weather forecast for 0700 shows 16-18 foot swells with a 18-20 second period along the coast. At 0500, a high-swell warning (with a severity rating of 10.0) was issued for DCPD.</p> <p>Initial conditions - Plant: An open fuel defect on one or two rods exists that has resulted in a restriction of the Unit 1 ramp rate to a limit of 3% per hour. D/G 1-3 is cleared to repair a crank case exhaustor motor ground and is due to be returned to service by 1400.</p>	None
7:00	Commence Evaluated Exercise	Crew takes the watch. Shift Manager receives a report of a mudslide on Avila Beach Road that is blocking all traffic, impacting normal access into and out of the plant. The ISEC may decide to declare an Unusual Event based on judgment that the lack of the primary access road to the plant (i.e. decreased ability of offsite agencies to respond to the plant).	None/HU6.1
7:35	Increased RCS Activity	A DMIM alarm on Loop 4 Hot Leg occurs which results in increased activity. The increased activity will result in high radiation alarms on RE-2, 4, RE-6 and RE-10 (These radiation monitors are located in containment, the charging pump room, the NSSS sample area and the Auxiliary Control Board area). Containment radiation levels will increase past the Alert threshold criteria. Therefore Containment Radiation monitor, RE-2, alarm becomes "T-0" for declaration of Alert - RA2.1.	RA2.1 initially, also will eventually meet FA1.1 due to loss of Fuel Clad FPB.
8:45	12kV Start-Up Bus and D/G 1-2 Failures	12kV Start-Up Bus 1-1 fails on differential OC relay trip. On the fault, D/G 1-2 fails due to an open lead on the fuel flash contactor in the voltage regulator. 4kV Bus H Start-Up breaker is also found to have failed.	None

*Diablo Canyon Power Plant Emergency Planning
Scenario Synopsis / Event Description*

2008 Evaluated Exercise - Team Bravo

10/29/2008

Time	Event Name	Event Description	Classifications
9:44	Steam Generator Tube Rupture	A 200 gpm SGTR develops on S/G 1-1. This event is classified as SAE - FS1.1 due to the loss of two fission product barriers - the RCS (SGTR) and Fuel Clad (Letdown radiation survey indicating greater than 15 R/hour per RB-14A). If needed to ensure proper time of shutdown, a low pressure reactor trip drillfile will be manually entered on the simulator at 0945 if needed. This is required to ensure consistency of radiation monitor readings (which requires a known time for plant shutdown).	FS1.1
12:00	RV-3 on S/G 1-1 Fails	This is the loss of the third fission-product barrier and results in an escalation to GE - FG1.1. The resulting plume will cause a sheltering PAR in PAZ 3 to be declared.	FG1.1
14:50	Evaluated Exercise Termination	Terminate exercise. The time for termination is approximated and will be based on consultation between the State, County and FEMA for ensuring offsite objectives have been met, and by the Drill Director ensuring DCCP objectives have been met.	None