



FEMA

April 15, 2009

Jack Colley, Chief
Governor's Division of Emergency Management
P.O. Box 4087
Austin, TX 78773-0220

David L. Lakey, M.D.
Texas Department of State Health Services
Radiation Control Program
P.O. Box 149347, Mail Code 1911
Austin, TX 78714-9347

Dear Mr. Colley and Dr. Lakey:

The purpose of this letter is to officially notify you of an identified deficiency that occurred during the April 6-7, 2009, Comanche Peak Nuclear Power Plant Plume and Ingestion Pathway Exercise. This deficiency was discussed during the post-exercise participant's briefing on April 9, 2009.

The identified deficiency is attributed to the Hood County, Texas Emergency Operations Center (EOC) under Evaluation Area Criterion 5.a.1., Activation of the Prompt Alert and Notification System.

This criterion indicates that the Emergency Alert System (EAS) message should be aired following the sounding of the sirens. This ensures that the public is alerted and then provided sufficient time to tune into the EAS station in order to listen to the EAS message. During the exercise, the EAS message was broadcast prior to sounding the alert signal. The mistiming of this alert signal would have caused the public to tune into the EAS station after the message had been initially provided. From that point, the public would not have the opportunity to listen to the EAS message until it was retransmitted. As a result, the population in the affected area could have experienced a significant delay in receiving critical information related to the emergency situation.

The sequence of sounding the sirens for alerting the public and broadcasting the EAS message was not consistent with established guidance. The first siren sounding was initiated at 1110 and the EAS message was broadcast at 1108. The State must ensure that procedures are followed to always sound the sirens before the EAS message is broadcast. The requirements pertaining to this evaluation area are found under NUREG-0654, Planning Standards E.5, 7, and G.3.a and 4.c.

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We have thoroughly reviewed and discussed this issue with DHS-FEMA Headquarters and the Nuclear Regulatory Commission (NRC). FEMA defines a deficiency as “...*an observed or identified inadequacy of organizational performance in an exercise that could cause a finding that off-site emergency preparedness is not adequate to provide reasonable assurance that appropriate 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.*”

Because of the potential impact on public health and safety, this situation should be corrected within 120 days of the exercise date through appropriate remedial actions. Please let us know the timing of these remedial actions and the identity of the Hood County participants who will be involved.

Your reply is required within ten days from the date of this letter, and your cooperation in this matter is sincerely appreciated. Please contact Lisa Hammond, Regional Assistance Committee Chair, at (940) 898-5199 with any questions relating to this letter.

Sincerely,


for Gary Jones
Acting Regional Administrator

cc: Vanessa Quinn - FEMA HQ
Megan Palko - GDEM
Bob Free - DSHS
Elmo Collins - NRC Region IV