



FEMA

August 4, 2009

Al Berndt, Assistant Director
Nebraska Emergency Management Agency
1300 Military Road
Lincoln, Nebraska 68508-1090

Dear Mr. Berndt:

This is to officially inform you of the U.S. Department of Homeland Security/Federal Emergency Management Agency's identification of one Deficiency finding during the Fort Calhoun Nuclear Station's Radiological Emergency Preparedness (REP) full-scale plume exposure pathway exercise, conducted on July 21, 2009.

A Deficiency is defined by FEMA as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding off-site emergency preparedness is not adequate to provide reasonable assurance, and 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.

The Washington County Emergency Operations Center (EOC) received one Deficiency finding under **Activation of the prompt alert and notification system – Criterion 5a1** – Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite officials to notify the public of an emergency situation (10 CFR Part 50, Appendix E & NUREG-0654, E.1., 4., 5., 6., 7.).

The Deficiency assessed was based on our findings that were demonstrated during this exercise that the general public would not have received all critical alerting, notification, and information concerning protective actions (including recommended evacuation) in a timely manner, if at all. This occurred because the Nebraska State EOC, Washington County EOC, National Weather Service, and KFAB Radio Station did not ensure that the plans, procedures, training, and actions concerning alerting and notification were in place to protect the health and safety of the public.

More detailed information regarding Criterion 5a1 process and performance is included in the enclosed issue.

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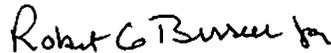
Because of the potential impact this finding has on public health and safety, it must be corrected within 120 days after the exercise date (July 21, 2009) through a remedial exercise. Other remedial actions required to be accomplished prior to the remedial exercise include: 1) Completion of in-depth operating procedures concerning how the EAS process will function in Nebraska; 2) Training for all individuals and agencies involved in the EAS process based on the new or modified procedures; 3) Establishment of a verification and monitoring process of the EAS; 4) Establishment of an increased multi-jurisdictional coordination process within each state and between both states; and 5) Modification of all plans to reflect the new and existing procedures. All of these actions will require coordination with Iowa.

This issue was discussed with both states, the counties involved, utility company, and NRC Region IV during the two post-exercise participant meetings conducted on July 23, 2009.

Please coordinate with this office regarding a Schedule of Corrective Actions, including the date, time, and identification of those organizations and participants, by title, participating in the remedial exercise and any other actions no later than August 13, 2009.

Your cooperation in this matter is sincerely appreciated. If you have any questions, please contact Ronald L. McCabe, Chairman, Regional Assistance Committee at (816) 283-7007.

Sincerely,



Arthur Freeman
Acting Regional Administrator

Enclosure

cc: Vanessa Quinn & Lisa Banks-Robinson, HQ REP
Lisa Gibney, NRC HQ
Bill Maier, NRC Region IV
Steve Gebers, OPPD

Issue # 1 - Washington County Emergency Operations Center

Condition: - Criterion 5a1, Activation of the prompt alert and notification system

Following the Site Area Emergency declaration, messages containing emergency information for people in Nebraska were broadcast in the incorrect sequence. This would have resulted in some emergency information not being provided to the public as well as causing confusion of the public.

Specifically the “Preliminary EAS Message #1” and the “Follow up to Initial EAS Message” were simulated to have begun broadcast by KFAB Radio Station prior to the broadcast of the “Initial EAS Message” being initiated by the National Weather Service (NWS). The Washington County Emergency Operations Center (EOC) contacted the NWS at **0955** with the request for them to begin the broadcast of the “Initial EAS Message” immediately. Without coordination between Washington County and the State EOC to ensure that this “Initial EAS Message” had been broadcast, the State EOC contacted KFAB Radio Station at **0947** to request them to begin broadcast of the “Preliminary EAS Message #1” and the “Follow up to Initial EAS Message” at **0955**. The KFAB broadcast actually began (simulated by the station personnel) at **0955**. The NWS broadcast of the “Initial EAS Message” actually began (simulated by NWS personnel) at **0957**. The KFAB broadcast of the “Follow up to Initial EAS Message” would have still been ongoing and would have been interrupted by this **0957** NWS EAS initiation. This is significant because the “Follow Up” message is the one that contains more specific information for the public concerning what emergency actions were taking place in response to the simulated emergency at the Fort Calhoun Station. The “Follow Up” message also contains specific instructions for the public such as placing animals on stored feed and water and tuning to EAS stations for further information.

Following the General Emergency declaration, a similar situation as above occurred once again. The State of Nebraska and Washington County made a coordinated decision at **1130** to evacuate (simulated) subarea 1. Coordination occurred to activate sirens at **1132**. The State EOC provided KFAB Radio Station instructions to broadcast Preliminary EAS Message # 1 and Message #11 (subarea 1 evacuation instructions) at **1137**. However, with no coordination between the State EOC and Washington County, the county inappropriately contacted the National Weather Service (NWS) to request them to broadcast these Messages. The NWS incorrectly elected to broadcast the “Initial EAS Message” again instead of Preliminary EAS Message # 1 and Message #11. This broadcast was simulated to occur at **1141**. The inappropriate broadcast of this message at this time would have interrupted the KFAB broadcast of Preliminary EAS Message # 1 and Message #11 that contained critical protective action instructions for the public.

Additional problems identified during the exercise, concerning alerting and notification of the public, which contributed to this Deficiency were:

Additional problems identified during the exercise, concerning alerting and notification of the public, which contributed to this Deficiency were:

- 1) The NWS only simulated broadcasting the initial EAS message once versus the three consecutive times, with tones, as required by their plan and procedures. The procedures were placed out on a desk, but never consulted during the exercise.
- 2) The Washington County EOC did not coordinate with Harrison County, Iowa, concerning the timing of sirens and/or the Initial EAS Message to be broadcast by the NWS. When Harrison County, Iowa, contacted the NWS to request them to broadcast the Initial EAS message, NWS informed them that they had already broadcast the Initial EAS, at 0957, based upon a request from Washington County. As a result of this lack of coordination, the sirens in Iowa were activated approximately 13 minutes after the sirens in Nebraska. The plans must be revised to ensure that the initial alerting and notification process is appropriately coordinated among all affected jurisdictions.
- 3) KFAB Radio Station failed to activate tones for Message #12 (subarea 1 and 2 evacuation). Following a wind shift in the scenario, the State EOC made the decision at 1238 to add subarea 2 to the areas recommended for evacuation. Sirens were to be activated at 1243 and KFAB was requested to broadcast Message #12 at 1248. It should be noted that an operator shift change had occurred at KFAB Radio Station at 1208. The new shift operator stated to the FEMA evaluator that, based on instructions from the Federal Communications Commission (FCC) he was not allowed to initiate the alerting tones for an EAS message. The failure to initiate the EAS tones could have prevented some of the public from being alerted to the seriousness of the situation and to protective actions being recommended for them.
- 4) No "code word" (required by the plans) was given by the State EOC to the KFAB operator nor was one asked for by KFAB
- 5) Following broadcast of the "Initial EAS Message" by NWS, the State EOC failed to contact NWS, per their procedures, to inform them that their alerting/notification role for this simulated emergency was now complete. Had this action occurred, it could have possibly prevented further issues later in the exercise

Possible Cause:

The possible cause for the above was the failure of all affected jurisdictions, including Washington County EOC and the State EOC to fully coordinate the alerting and notification process, including the times for siren activation and the broadcast of emergency information for the public.

Effect: The failure of Washington County and the State EOC to coordinate the timing for the initial alerting and notification sequence would have resulted in at least a portion of the public within the 10 mile Emergency Planning Zone within Nebraska not receiving critical information concerning the emergency actions and instructions related to the simulated emergency at the Fort Calhoun Nuclear Station.

References:

(NUREG-0654, E.5., 7., G.3.a., G.4.a.b.c.)