U.S. Department of Homeland Security
Region VII
9221 Ward Parkway, Suite 300
Kansas City, MO 64114-3372

FEMA

August 4, 2009

Mr. David L. Miller, Administrator
Iowa Homeland Security and Emergency Management Division
Camp Dodge, Building W-4
7105 NW 70th Avenue
Johnston, Iowa 50131-1824

Dear Mr. Miller:

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 Harrison County Emergency Operations Center (EOC) received a 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 in a timely manner, if at all. This occurred because the Harrison 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.

Because of the potential impact this finding has on public heath 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 Iowa; 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 Nebraska.

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,

Robert C. Burrell for

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 - Harrison County Emergency Operations Center

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

Following receipt of the **Site Area Emergency Classification**, Harrison County did not provide KFAB radio station accurate instructions as to the appropriate messages to broadcast for the public. They did not instruct KFAB to follow the broadcast of the Preliminary EAS Message with the "Follow up to Initial EAS Message" per the plans. Therefore, the follow up message was never broadcast which would have resulted in the public within the Iowa portion of the 10-mile Emergency Planning Zone receiving incomplete information concerning emergency actions and instructions related to the simulated emergency at the Fort Calhoun Nuclear Station.

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) Harrison County Emergency Operations Center (EOC) did not coordinate with Washington County, Nebraska, concerning the timing of sirens and/or the Initial EAS message to be broadcast by the National Weather Service (NWS). When Harrison County EOC contacted the NWS to request them to broadcast the Initial EAS message, NWS informed the county that they had already broadcast the Initial EAS, at 0957, based upon a request from Washington County, Nebraska. As a result of this lack of coordination, the sirens within the Iowa portion of the EPZ were activated approximately 13 minutes after the sirens in the Nebraska portion of the EPZ. Persons in the Iowa portion of the EPZ would not have been alerted to the Initial EAS message for the first broadcast (0957) and may not have heard it until it was rebroadcast at about 1012, which is about 15 minutes later than most people in Nebraska would have heard the message. This could have caused confusion for people in Iowa as to whether they were affected by the emergency situation. The plans must be revised to ensure that the initial alerting and notification process is appropriately coordinated among all affected jurisdictions.

3) Following the General Emergency declaration, Harrison County EOC, at **1148,** contacted the National Weather Service (NWS) in error, instead of contacting KFAB radio station as required by the plans, to have them broadcast Iowa Message # 1, the Preliminary EAS message. The NWS informed Harrison County that Washington County, Nebraska had already requested this at **1141** so they would not be acting on the Harrison County request. In fact, NWS broadcast the wrong message for Nebraska (the "Initial EAS Message"). If NWS had followed through with the Harrison County request, the same wrong message would have broadcast for Iowa which would have conflicted with a broadcast of critical protective action instructions for the public being broadcast by KFAB radio station. It should be noted that, after incorrectly contacting NWS, Harrison County subsequently did contact KFAB radio station to have them broadcast the correct messages.

Possible Cause:

The possible cause for the above was the failure of the Harrison County EOC to ensure that clear and complete instructions were provided to KFAB Radio Station concerning which messages to broadcast. In addition, Harrison County did not effectively coordinate the release time of their messages with Washington County, Nebraska.

Effect:

The follow up message was never broadcast which would have resulted in the public within the Iowa portion of the 10-mile Emergency Planning Zone receiving incomplete and/or confusing information concerning 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.)