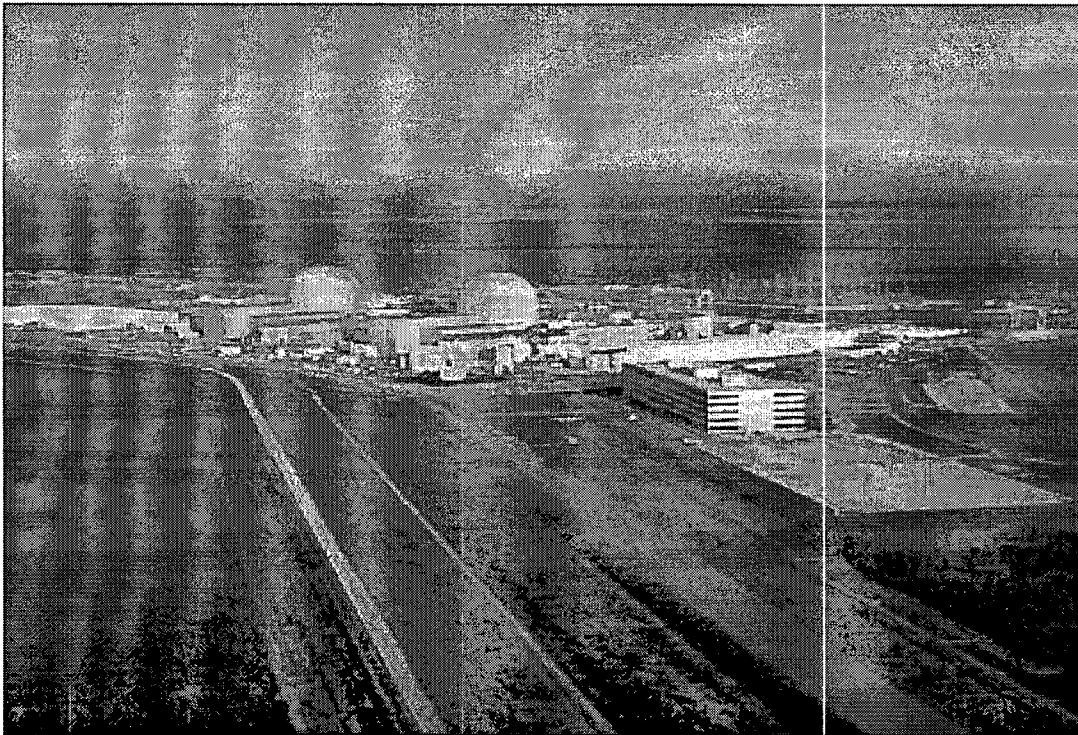
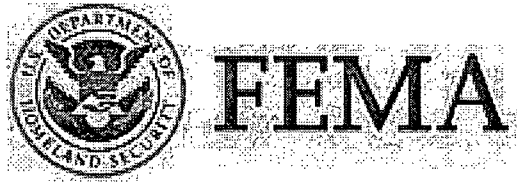


Interim Finding Report for Reasonable Assurance

On the adequacy of the offsite
Radiological Emergency Response Planning and Preparedness
South Texas Project (STP) Nuclear Power Plant
Bay City, Texas
2009-08-07



Prepared by the
U.S. Department of Homeland Security
Federal Emergency Management Agency
National Preparedness Directorate
Technological Hazards Division
Region 6

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Executive Summary

On December 3, 2007, South Texas Project Nuclear Power Plant and NRG Energy submitted a Combined License (COL) Application to the U.S. Nuclear Regulatory Commission to construct and operate South Texas Project Nuclear Power Plant facility Units 3 and 4 located in Bay City, Texas. The review of the materials provided with the COL Application resulted in the findings for the sixteen Planning Standards, which were all found to be Adequate.

The following materials provided with the COL Application were the basis for the review:

- The existing Radiological Emergency Preparedness Plans (REPPs) from the State of Texas (April 2009)
- The Radiological Emergency Preparedness Plans (REPPs) from Matagorda County, Bay City, and Palacios (April 2006)

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," amended March 2002, its Supplements, the Interim REP Program Manual (dated August 2002), and current FEMA guidance documents were considered in making the determination as to the plans' adequacy.

The review of the offsite emergency plans resulted in evaluation findings for all of the planning standards and associated criteria contained in NUREG-0654/FEMA-REP-1, Rev. 1, as amended, that are ORO responsibilities. Each planning standard and criterion was rated as:

- Adequate: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed.
- Adequate – corrections must be made: Plans are adequate but before a determination can be made as to whether they can be implemented, corrections must be made to the plans or supporting measures must be demonstrated (e.g. adequacy and maintenance of procedure, training, resource, staffing levels and qualifications, and equipment).
- Inadequate: Plans are inadequate and cannot be implemented until they are revised to corrected deficiencies noted in the Federal review.
- N/A: The planning standard is not applicable to offsite response organizations.

The review resulted in the following interim evaluation findings (ratings for each individual criterion are summarized in Section V, Criterion Rating Summary):

- Planning Standard A: Adequate
- Planning Standard B: N/A
- Planning Standard C: Adequate
- Planning Standard D: Adequate
- Planning Standard E: Adequate

- Planning Standard F: Adequate
- Planning Standard G: Adequate
- Planning Standard H: Adequate
- Planning Standard I: Adequate
- Planning Standard J: Adequate
- Planning Standard K: Adequate
- Planning Standard L: Adequate
- Planning Standard M: Adequate
- Planning Standard N: Adequate
- Planning Standard O: Adequate
- Planning Standard P: Adequate

I. INTRODUCTION

A. General Characteristics of the South Texas Project

The area within a 10-mile radius of the South Texas Project (STP) is located in the State of Texas, entirely within Matagorda County. The plant site is located approximately 14 miles southwest of Bay City and 75 miles southwest of Houston.

There are no incorporated jurisdictions within the 10-mile radius of the facility. The EPZ includes several unincorporated towns and subdivisions. The remainder of the EPZ consists of unincorporated farmland and fields.

Industrial facilities within the EPZ include the Celanese Chemical Plant, Lyondell, and oil or gas pipelines. Based on the 2000 Census, the total population of the EPZ is 2,875, a decrease from the 1990 census.

The Colorado River runs north to south through the EPZ and forms the eastern boundary of the site. A public wharf, located at the Port of Bay City, 4.8 miles to the north-northeast of the plant, is used for loading and unloading gasoline and diesel oil from barges on the Colorado River.

The Burlington Northern/Santa Fe Railroad runs north to south through the EPZ, about 8 miles east of the plant. The Union Pacific Railroad runs east to west through the northern part of the EPZ, approximately 7 miles from STPEGS. Various railroad spurs run off these rails to support industrial locations. Two State highways are within the EPZ.

State Highway 35 forms the northwestern and western boundary of the EPZ. State Highway 60 runs north to south through the EPZ, about 7 miles from STP.

There are three schools within the 10-mile radius. Matagorda Elementary is located 8 miles south-southeast of STP. Tidehaven High School and Junior High School are also within the EPZ at 8 to 8.5 miles north-northwest of the plant.

FM-521 River Park is located about 3 miles from the plant. Recreational facilities, Riverside Park and Rio Colorado Golf Course, are located 9 miles from the plant. Another recreational area, Matagorda Beach, is about 15 miles south of the plant. Evacuation of the beach area is north on State Highway 60, through the EPZ.

There are no other public institutions or commercial recreational areas in the EPZ. The EPZ is divided into 11 zones, based primarily on natural

boundaries, for the purpose of emergency response planning and the implementation of protective actions.

B. Emergency Response Organizations

Protective Actions Decisions (PADs) are made at the county level for emergencies at nuclear power plants located in the State of Texas, unless a State of Emergency has been declared. Under a State of Emergency, final authority for all offsite emergency actions rests with the Governor of the State of Texas.

The function of the Governor's Division of Emergency Management (GDEM) is to provide overall management and coordination of State, local, Federal, and private/volunteer organizations in response to an accident at the STP (STP).

The Department of State Health Services (DSHS) directs the technical response to an accident at STP, fulfilling technical functions such as accident assessment, radiological monitoring, and development of offsite Protective Action Recommendations (PARs).

C. Plans

The Texas Radiological Emergency Management (REM) Plan consists of five tabs and a manual of radiological emergency management procedures and is maintained under separate cover by DSHS. The REM Plan assigns responsibilities to State agencies and details procedures for conducting a coordinated response to radiological emergencies.

The REM Plan contains five tabs. The types of emergencies addressed in the five tabs are: fixed nuclear facility accidents, production/utilization accidents, Federal facility accidents, transportation accidents, and waste storage/disposal accidents.

The REM Procedures Manual consists of a series of procedures that provide guidance and ensure uniformity in the performance of selected tasks applicable to any or all of the various types of radiological emergencies. Where specific instructions are required for implementing a given procedure with respect to an individual facility or accident type, those instructions are incorporated in the appropriate tab of the Texas REM Plan.

Offsite Plan Reviews Include:

- State of Texas Emergency Management Plan, Annex D, Radiological Emergency Management, Rev. 06/05

- Emergency Management Plan for Matagorda County, Bay City, and Palacios, Annex W Plan, Fixed Nuclear Facilities Response, Radiological Emergency Preparedness (REP) Plan, Rev. 11, April 27, 2006
- State implementing procedures referenced by the plan

D. Basis for Findings

Interim Findings in this report are based on the following guidance:

1. 44 CFR 353
2. Published FEMA REP Guidance Documents
3. NUREG 0654/FEMA REP-1, Rev.1

E. Evaluation Format

In accordance with the Memorandum of Understanding (MOU) 44 CFR Appendix A with the Nuclear Regulatory Commission (NRC), FEMA agreed to furnish assessments, findings and determinations as to whether State, Tribal and local emergency plans and preparedness are adequate and continue to be capable of implementation (e.g., adequacy and maintenance of procedures, training, and resources, staffing levels, qualification and equipment adequacy). These findings and determinations are used by NRC under its own rules in connection with its licensing and regulatory requirements and FEMA supports its findings in the NRC licensing process and related court proceedings 44 CFR 350.3(f)

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 is the guidance used to review and develop this Interim Finding Report.

II. REVIEW AND EVALUATION OF OFFSITE EMERGENCY PREPAREDNESS PLANS AND PROCEDURES FOR THE SOUTH TEXAS PROJECT AGAINST THE PLANNING STANDARDS OF NUREG-0654/FEMA REP-1, REV.1

- A. Assignment of Responsibility (Organizational Control):
Primary responsibilities for emergency response by the nuclear facility licensee and by State and local organizations within the Emergency Planning Zones have been assigned, the emergency responsibilities of the various supporting organizations have been specifically established, and each principal response organization has staff to respond and to augment its initial response on a continuous basis.
- A.1.a Evaluation Criterion: Each plan shall identify the State, local, Federal, and private sector organizations (including utilities), that are intended to be part of the overall response organization for Emergency Planning Zones.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Response organizations are identified.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. All response organizations for the EPZ are identified.

Plan Reference

State of Texas:
Annex D, Section V. B
Annex D, Appendix 1
Annex D, Tab 1, Section VI. A.2
Annex D, Tab 1, Section VI. B.1-2
Annex D, Tab 1, Section VII. A-G

Matagorda County:
Basic Plan, Section V
Annex W, Section III
Annex W, Section V

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.1.b Each organization and sub-organization having an operational role shall specify its concept of operations and its relationship to the total effort.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The Concept of Operations for all responding entities is delineated.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The Concept of Operations for all responding entities is delineated.

Plan Reference

State of Texas:

Annex D, Section IV. A-I

Annex D, Tab 1, Section VII

Annex D, Tab 1, Chapter 2, Section VI

Annex D, Tab 1, Chapter 2, Section VII. A-C

Matagorda County:

Basic Plan, Section IV

Basic Plan, Section V

Annex W, Section IV

Annex W, Section V

Annex W, Tab 1, Section IV

Annex W, Tab 2, Section IV

Annex W, Tab 3, Section III

Annex W, Tab 4, Section III

Annex W, Tab 5, Section III

Annex W, Tab 6, Section III

Annex W, Tab 7, Section IV

Annex W, Tab 8, Section III

Annex W, Tab 9, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

A.1.c. Each plan shall illustrate these interrelationships in a block diagram.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The diagram illustrates the correlation of plan elements. The block identifying the Texas Department of Health-Bureau of Radiation Control needs to be revised to reflect the current name of the agency.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Attachment 11 illustrates the structure of the Matagorda County emergency organization with the County Judge in charge of the emergency response. Attachment 12 is a chart illustrating emergency management functional responsibilities for the county. Attachments 13 and 14 represent the same for Bay City with the Mayor in charge and Attachments 15 and 16 represent the same for Palacios with the Mayor in charge.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 1

Matagorda County:
Basic Plan, Attachments 11, 12, 13, 14, 15, and 16

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.1.d Each organization shall identify a specific individual by title who shall be in charge of the emergency response.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Section V., RCP Response Levels, designates "the Radiation Program Officer or his/her assigned designee" as the person in charge for any class of accident and response by the agency.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The County Judge and City Mayors are identified as in charge of emergency response plans and measures with the authority to declare a local state of disaster. The Executive Group, which includes the Judge and Mayors, and their responsibilities are clearly defined in Section V. of the Basic Plan and in Annex W, Section V., A. Direction and Control.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section V (end of first paragraph)

Matagorda County:
Basic Plan, Section IV, A. and B.
Basic Plan, Section V, A.
Annex W., Section V.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.1.e Each organization shall provide for 24-hour per day emergency response, including 24-hour per day manning of communications links.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The 24-hour emergency response contact telephone number is listed in Appendix 2. Response team personnel will be activated and will maintain 24-hour operational capability as listed under a General Emergency

response in Tab 1, Chapter 2. Extended duty responsibilities are listed in Annex D, Section V.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The Matagorda County Sheriff and the Police Chiefs from Bay City and Palacios are tasked with overseeing communications services between the EOC, county/city service departments, shelters, operating teams or agencies, other cities, counties, State Disaster District, and Federal agencies on a continuous 24-hour per day status for emergency response and recovery.

Plan Reference

State of Texas:

Annex D, Appendix 2, 1.b. (10)

Annex D, Section V.B.1.b.

Annex D, Tab 1, Chapter 2, Section V. (last sentence of last paragraph)

Procedure 13, Section IV

Matagorda County:

Basic Plan, Section V

Basic Plan, Section V.B.2.a

Annex W, Section IV

Annex W, Section V

Annex W, Tab 2, Section I.A

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.2.a Each organization shall specify the functions and responsibilities for major elements and key individuals by title, of emergency response, including the following: Command and Control, Alerting and Notification, Communications, Public Information, Accident Assessment, Public Health and Sanitation, Social Services, Fire and Rescue, Traffic Control, Emergency Medical Services, Law Enforcement, Transportation, Protective Response (including authority to request Federal assistance and to initiate other protective actions), and Radiological Exposure Control. The description of these functions shall include a clear and concise summary such as a table of primary and support responsibilities using the agency as one axis, and the function as the other.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Annex D, Tab 1, Chapter 2, Section VII. C. cites specific STP response team capabilities for 10 different functions/titles from licensee liaison to field teams to public information coordination. Procedure 13 at Section III specifies the responsibilities of the Emergency Monitoring Group Planners, Manager, and personnel for ensuring emergency response preparedness.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. All functions are specified and key individuals identified by title. Attachments to the Basic Plan contain charts depicting responsibilities by title and function.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section VII. C.1-11
Procedure 13, Section III

Matagorda County:
Basic Plan, Section V
Basic Plan, Attachments 12, 14, 16
Annex W, Section V

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.2.b. Each plan shall contain (by reference to specific acts, codes, or statutes) the legal basis for such authorities.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Annex D in Section I.A. refers to the Emergency Management Plan (Basic Plan) for general authorities listed by State, Federal and Mutual Aid Agreements and Contingency Plans for the State of Texas. The Federal Response Plan reference needs updating under the State plan. Other

authorities pertaining to the radiological emergency management are cited in Section I.B. in Annex D.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Section I., A.-C. cites the Federal, State, and local Acts, Executive Orders, Codes, Presidential Directives, Plans, Court Orders, City Ordinances, Resolutions, and Letters of Agreement that govern the organization and operational concept of the Matagorda County, Bay City and Palacios Emergency Management Basic Plan.

Plan Reference

State of Texas:
Annex D, Section I.A-B.

Matagorda County:
Basic Plan, Section I.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.3 Each plan shall include written agreements referring to the concept of operations developed between Federal, State, and local agencies and other support organizations having an emergency response role within the Emergency Planning Zones. The agreements shall identify the emergency measures to be provided and the mutually acceptable criteria for their implementation, and specify the arrangements for exchange of information. These agreements may be provided in an appendix to the plan or the plan itself may contain descriptions of these matters and a signature page in the plan may serve to verify the agreements. The signature page format is appropriate for organizations where response functions are covered by laws, regulations or executive orders where separate written agreements are not necessary.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Annex D identifies State agencies with predetermined support roles to the Department of State Health Services for radiological emergencies. These include the Texas Department of Agriculture, the Texas Department of Public Safety, the Texas Commission on Environmental Quality, and the

Texas Parks and Wildlife Department. Letters of agreement (LOAs) from the University of Texas and Texas A&M University are included in Annex D, Tab 1 as Attachments 2 and 3. The LOAs specify laboratory capabilities and equipment available to augment DSHS.

Matagorda County: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. The Basic Plan Attachments contain: State Executive Order RP01 establishing the Emergency Management Council for the State of Texas; Chapter 418, the Texas Disaster Act of 1975; a 1999 Matagorda County Order and 2003 Ordinances from the cities of Bay City and Palacios establishing comprehensive Emergency Management programs and creating the offices of Emergency Management Director; Joint Resolutions between Matagorda County and Bay City and Palacios establishing the Matagorda County Emergency Management Organization; and charts detailing the County and city organizations and functional responsibilities as well as charts depicting the State Disaster Districts and Emergency Management Council.

Plan Reference

State of Texas:

Annex D, Section IV.A. 2-3

Annex D, Tab 1, Section VII.G

Annex D, Tab 1, Attachments 2 and 3

Annex D, Tab 1, Chapter 2, Section III.C. 3 (last sentence)

Matagorda County:

Basic Plan, Attachments 3-9, 11-12, 14-18

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- A.4 Each principal organization shall be capable of continuous (24-hour) operations for a protracted period. The individual in the principal organization who will be responsible for assuring continuity of resources (technical, administrative, and material) shall be specified by title.

Criterion Statement

State of Texas: Plans are adequate and there is reasonable assurance that they can be implemented with only limited or no corrections needed. Annex D, Tab 1, Chapter 2 lists the 24-hour capability/response of the Department of State Health Services, Radiation Control Program (DSHS-RCP), as well as the 24-hour operational status from the Governor's Department of Emergency Management in Section III. The laboratories at University of Texas and Texas A&M can support operations on a 24-hour basis per Annex D, Tab I, Section VII.G. Procedure 13 cites the responsibilities of the three DSHS-RCP Emergency Planners: one becomes the Emergency Operations Coordinator, one is responsible for personnel recall and the rostering of a minimum of two emergency response teams for 24-hour operations, and the third member coordinates preparations of transportation, equipment, and the mobile lab. Attachment 4 is the template for the 24-hour roster.

Matagorda County: In the Basic Plan, each emergency organization is responsible to provide for extended 24-hour operations per Section IV.D.2. and Section V. Under Annex W, Section IV., the County Judge is assigned responsibility for directing operations of the County's emergency response forces, and each department, agency or group with emergency response duties is responsible for ensuring essential emergency service throughout a protracted 24-hour operation. The Sheriff's Office Dispatch is specifically tasked with staffing for 24-hour communications capability in Annex W, Tab 2, Section I.

Plan Reference

State of Texas:
Annex D, Tab 1, Section VII.G
Annex D, Tab 1, Chapter 2, Section III.C.1
Annex D, Tab 1, Chapter 2, Section V
Procedure 13, Section IV.C.2
Procedure 13, Attachment 4

Matagorda County:
Basic Plan, Section IV.D
Basic Plan, Section V
Annex W, Section IV
Annex W, Tab 2, Section I

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

B. **Onsite Emergency Organization**

On-shift facility licensee responsibilities for emergency response are unambiguously defined; adequate staffing to provide initial facility accident response in key functional areas is maintained at all times; timely augmentation of response capabilities is available; and the interfaces among various onsite response activities and offsite support and response activities are specified.

This planning standard applies only to onsite response organizations therefore; evaluation of this standard is not included in this report.

C. **Emergency Response Support and Resources**

Arrangements for requesting and effectively using assistance resources have been made, arrangements to accommodate State and local staff at the licensee's near-site Emergency Operations Facility have been made, and other organizations capable of augmenting the planned response have been identified.

- C.1.a Specific persons by title authorized to request Federal assistance; see A.1.d, A.2.a.

Criterion Statement

State of Texas: Plans are adequate. There is clear identification of the key official(s) authorized to request Federal assistance.

Matagorda County: Not Applicable

Plan Reference

State of Texas:
TEMP, Basic Plan, Section IV.C.6.f
Annex D, Tab 1, Section VI. B. 4-5
Annex N, Appendix 2, Section 2.D.2.a

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- C.1.b Specific Federal resources expected, including expected times of arrival at specific nuclear facility sites.

Criterion Statement

State of Texas: Plans are adequate. An expected time of arrival for the Federal assets is included in the plan.

Matagorda County: Not Applicable

Plan Reference

State of Texas:
Annex D, Section IV. B.2
Annex D, Tab 1, Section VI.B.6
Annex D, Tab 1, Chapter 2, Section III.D.1

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- C.1.c Specific licensee, State, and local resources available to support the Federal response, e.g., airfields, command posts, telephone lines, radio frequencies, and telecommunications centers.

Criterion Statement

State of Texas: Plans are adequate. Annex D indicates that the licensee, State and local resources designated for Federal support are cited in the site-specific Federal plan for each facility. The plan describes the support available from the State Emergency Operating Center, Austin, TX and the Disaster District Sub 2C, Pierce, TX.

Matagorda County: Plans are adequate. The Basic Plan describes the highways, railways, waterways, and airports available for use in the

county. Annex W identifies telephone, radio, law enforcement teletype service, EAS, and volunteer (Amateur Radio Club) capabilities.

Plan Reference

State of Texas:

Annex D, Tab 1, Section VI.B.6

Annex D, Tab 1, Chapter 2, Section III

Matagorda County:

Basic Plan, Section III. A

Annex W, Tab 2, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- C.2.a Each principal offsite organization may dispatch representatives to the licensee's near-site Emergency Operations Facility (State technical analysis representatives at the near-site EOF are preferred.)

Criterion Statement

State of Texas: Plans are adequate. DSHS Radiation Control Program (RCP) activates response teams in support of emergency response operations. The Licensee Liaison Team (2 member team) is deployed to the EOF and tasked with observing STP activities, relaying information to other RCP response teams and keeping STP informed of RCP activities.

Matagorda County: Plans are adequate. The Emergency Management Director may dispatch a County representative to the EOF to coordinate activities with Federal and utility response personnel.

Plan Reference

State of Texas:

Annex D, Section V.B. 2.e

Annex D, Tab 1, Chapter 2, Section VII.A.2

Annex D, Tab 1, Chapter 2, Section VII.C.1

Annex D, Tab 1, Chapter 2, Section III.B.1

Matagorda County:

Annex W, Tab 9, Emergency Operations Center, Section VIII.

Administration and Support, A.3. On-scene Command Post

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- C.3 Each organization shall identify radiological laboratories, their general capabilities, and expected availability to provide radiological monitoring and analyses services which can be used in an emergency.

Criterion Statement

State of Texas: Plans are adequate. Primary and back-up laboratory facilities are identified in the State plan. Capabilities and availability for the primary and back-up labs are identified and letters of agreement are attached in Annex D, Tab 1, Attachments 2 and 3.

Matagorda County: Not Applicable

Plan Reference

State of Texas:

Annex D, Section IV.G.1

Annex D, Tab 1, Section VII.D.1-4

Annex D, Tab 1, Attachments 2 and 3

Annex D, Tab 1, Chapter 2, Section VII.C.4-5

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- C.4 Each organization shall identify nuclear and other facilities, organizations or individuals that can be relied upon in an emergency to provide assistance. Such assistance shall be identified and supported by appropriate letters of agreement.

Criterion Statement

State of Texas: Plans are adequate. The plan identifies State, local, and Federal agencies that are available to provide assistance in an emergency. Letters of agreement, when applicable, are included in the plan or an appropriate reference to the location of the letter is listed in the plan.

Matagorda County: Plans are adequate. The plan outlines the primary responsibilities of emergency management in the county from the Executive Group to Department and Agency Functions including volunteer groups. Attachment 22 lists the letters of agreement that are on file in the County Judge's office. These include agreements with broadcast organizations such as radio stations, medical services such as the ambulance companies, and fire and rescue such as area volunteer fire departments.

Plan Reference

State of Texas:

Annex D, Section IV.A.2

Annex D, Section IV.I.1-5

Annex D, Section V.B.3.a-f

Annex D, Tab 1, Section VI.B.1-4

Annex D, Tab 1, Section VII.A-G

Annex D, Tab 1, Attachments 2 and 3

Annex D, Tab 1, Chapter 2, Section III

Matagorda County:

Basic Plan, Section VIII. Resource Control

Basic Plan Section V. Organization and Assignment of Responsibilities

Basic Plan Attachment 22, Letters of Agreement

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

D. Emergency Classification System

A standard emergency classification and action level scheme, the bases of which include facility system and effluent parameters, is in use by the nuclear facility licensee, and State and local response plans call for reliance on information provided by the facility licensees for determinations of minimum initial offsite response measures.

- D.3. Each State and local organization shall establish an emergency classification and emergency action level scheme consistent with that established by the facility Licensee.

Criterion Statement

State of Texas: Plans are adequate. The plan requires classification of events according to a mutually adopted accident classification system. The classification system adopted by the State is consistent with NUMARC/NESP-007, Methodology for Development of Emergency Action Levels, January 1992, Rev. 2 (Unusual Event, Alert, Site Area Emergency, and General Emergency). The classification scheme is consistent with the applicant. The Radiation Control Program (RCP) response levels for each of the Emergency Classification Levels detailed in the plan are included in Annex D, Tab 1, Chapter 2, and Section V.

Matagorda County: Plans are adequate. The county plan utilizes the classification system that is consistent with both the applicant and the State. The plan also includes general actions to be taken at the county for each individual Emergency Classification Level (ECL) and requires more specific actions in each individual position procedure.

Plan Reference

State of Texas:
Annex D, Tab 1, Section VII.A.2
Annex D, Tab 1 Chapter 2, Section IV & V

Matagorda County:
Annex W Section VI

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- D.4. Evaluation Criterion: Each State and local organization should have procedures in place that provide for emergency actions to be taken that are consistent with the emergency actions recommended by the nuclear facility Licensee, taking into account local offsite conditions that exist at the time of the emergency.

Criterion Statement

State of Texas: Plans are adequate. The NUREG-0654/FEMA-REP-1 cross-reference submitted for this planning standard criterion describes actions to be taken in response to specific Emergency Classification Levels (ECL) and includes references to procedures where specific actions are described that will be taken at each ECL.

Matagorda County: Plans are adequate. The basic county plan contains a reference to Annex W for fixed nuclear facility response. Annex W includes specific reference to each of the individual procedures to be implemented in response to recommendations by the utility. The procedures are specific to either a position (i.e., Emergency Management Director) or locations (i.e., Reception Center).

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section V
Procedure 1, Section II
Procedure 1, Attachments 1 & 2
Procedure 13, Section IV.B

Matagorda County:
Basic Plan Section V.B
Annex W IX.I
Annex W REP Procedures

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

E. Notification Methods and Procedures

Procedures have been established for notification by the licensee of State and local response organizations and for notification of emergency personnel by all response organizations; the content of initial and follow up messages to response organizations and the public has been established; and means to provide early notification and clear instruction to the populace within the plume exposure pathway Emergency Planning Zone have been established.

- E.1 Each organization shall establish procedures that describe mutually agreeable bases for notification of response organizations consistent with the emergency classification and action level scheme set forth in Appendix 1. These procedures shall include means for verification of messages. The specific details of verification need not be included in the plan.

Criterion Statement

State of Texas: Plans are adequate. In Annex D, Appendix 2, Section 2.a-c the plan, at minimum, establishes procedures that describe the notification of the designated response organizations at the State level consistent with the NUREG-0654 Emergency Classification Level scheme. Other information contained in this section describe actions to be taken following the notification from the licensee that the notified State organization would contact the local entities such as the County Judges, Mayors, and Emergency Coordinators of the possibly affected area. Annex D, Tab 1, Section VII establishes a basis for how the follow-up notifications and verification of those notifications will take place. The verification process will be preformed by the Texas Department of Public Safety. The Bureau of Radiation Control at the State level and the local jurisdiction would be receiving the follow-up notifications from the licensee.

Matagorda County: Plans are adequate. In the Basic Plan there is an overview of the NUREG-0654 Emergency Classification Level just to show that the county will respond in a manner consistent with the increased severity of the on site situation. The information contained in Annex W, Section V and Tab 1, Section IV is consistent with the NUREG-0654 recommended responses per each classification level. The verification of the notification messages is delegated to the Matagorda County Sheriff's Communications Officer in Annex W Section V.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 2.a-e.

Annex D, Tab 1, Section VII.A.3, 4, and 10

Annex D, Tab 1, Section VII.B.1

Matagorda County:

Basic Plan, Section VI

Annex W, Section V.B

Annex W, Tab 1, Section V

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- E.2 Each organization shall establish procedures for alerting, notifying, and mobilizing emergency response personnel.

Criterion Statement

State of Texas: Plans are adequate. The Radiation Control Program (RCP) is designated as the entity that is responsible for notifying each staff member. A notification call list contained in the Procedure 13 identifies the key officials to contact if an incident occurs at the STP (STP). Also in Procedure 13 there is reference to means by which notification will be accomplished (telephone to cell phones or pagers). The notifications that will be made by the RCP follow the Emergency Classification Level scheme.

Matagorda County: Plans are adequate. In the concept of operation section of Annex W, Tab 1, the method by which Matagorda County will initiate their notification process by each ECL is described. The notification sources within the same annex lists the means by which the notifications will be accomplished (TLETS, telephone, and radio). The senior elected officials are shown in the plan as being responsible for initiating the notification to the public and first responders.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 2.b-e

Annex D, Tab 1, Chapter 2, Section V

Procedure 13, Section IV.B

Procedure 13

Matagorda County:
Annex W, Tab 1, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- E.5 State and local government organizations shall establish a system for disseminating to the public appropriate information contained in initial and follow up messages received from the licensee, including the appropriate notification to appropriate broadcast media, e.g., the Emergency Broadcast System (EBS).

Criterion Statement

State of Texas: Plans are adequate. The State Plan designates local government as the responsible entity for disseminating warnings and notifications to the public during an emergency. The JIC will be staffed with STP, State, county, and Federal public information representatives. These representatives coordinate information, issue news bulletins, and participate jointly in news briefings.

Matagorda County: Plans are adequate. The Matagorda County Sheriff's Office Communications Officer is responsible for disseminating warnings and notifications to the public in a timely manner (approximately 15 minutes). Warnings and notifications are provided through cooperation with electronic media sources and the Emergency Alert System.

Plan Reference

State of Texas:
Annex D, Tab 1, section VII.F.1
Annex D, Tab1, Chapter 2, Section III.B.2
Annex D, Appendix 2, Section 2.b-e
Annex D, Tab 1, Chapter 2, Section VII.C.8

Matagorda County:
Annex W, Section V.C
Annex W Tab 1, Section IV. E
Annex W, Tab 5, All

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- E.6 Each organization shall establish administrative and physical means, and the time required for notifying and providing prompt instruction to the public within the plume exposure pathway Emergency Planning Zone. It shall be the licensee's responsibility to demonstrate that such means exist, regardless of who implements this requirement. It shall be the responsibility of the State and local governments to activate such a system.

Criterion Statement

State of Texas: Plans are adequate. The sections referenced in the State plan cross-reference contain information related to establishing administrative and physical means, and times required for notifying and providing prompt instruction to the public within the EPZ.

Matagorda County: Plans are adequate. The plan states that the Matagorda County Sheriff's Office employs a Communications Officer to administer siren and radio activation in the EPZ plume exposure pathway. Warnings and notifications are made within 15 minutes of their notification of an incident at STP.

Plan Reference

State of Texas:

TEMP, Basic Plan, Section IV.C.2.c

Annex A, Section IV.B.2.i

Annex A, Section IV.C. 1 & 2

Annex D, Appendix 2, Section 2. b-e;

Annex D, Tab 1, Section VII.B.4;

Annex D, Tab 1, Chapter 2, Section VII.C.8

Matagorda County:

Basic Plan, Section V.B.2;

Annex W, Section V.C;

Annex W, Tab 1 Section III.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- E.7 Each organization shall provide written messages intended for the public, consistent with the licensee's classification scheme. In particular, draft messages to the public giving instructions with regard to specific protective actions to be taken by occupants of affected areas shall be prepared and included as part of the State and local plans. Such messages should include the appropriate aspects of sheltering, ad hoc respiratory protection, e.g., handkerchief over mouth, thyroid blocking, or evacuation. The role of the licensee is to provide supporting information for the messages. For ad hoc respiratory protection see "Respiratory Protective Devices Manual" American Industrial Hygiene Association, 1963, pp. 123–126.

Criterion Statement

State of Texas: Plans are adequate. Procedure 14 contains information related to the drafting of information that would inform the public of protective actions and information about messages being consistent with the applicant's classification scheme.

Matagorda County: Plans are adequate. The Matagorda County plan says the Matagorda County PIO will coordinate information with the utility and other JIC partners before disseminating information authorized by the Emergency Management Director through the media to the public. It also directs the PIO to draft written messages covering evacuation or sheltering-in-place of certain zones for distribution through the media.

Plan Reference

State of Texas:
Procedure 1, Section VII.B 1-2
Procedure 2, Attachments 2-3
Procedure 14, Attachment 2

Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D
Annex W, Tab 5 All
Annex W, REP Procedure (63)

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

F. Emergency Communications

Provisions exist for prompt communications among principal response organizations to emergency personnel and to the public.

- F.1.a Provision for 24-hour per day notification to and activation of the State/local emergency response network; and, at a minimum, a telephone link and alternate, including 24-hour per day manning of communications links that initiate emergency response actions.

Criterion Statement

State of Texas: Plans are adequate. Procedure 13, Section IV.A.1-3 lists the 24-hour Radiation Control Emergency Hotline with the 24-hour back-up being the Hastings Answering Service. If the primary hotline is down or the operator cannot answer, the call will automatically roll over to the answering service. The procedures to initiate the emergency response actions following the calls from the answering service are updated through the State Environmental Monitoring Group. There is a transfer procedure that the switchboard operator uses for routing all incoming calls to the responsible party in the Radiation Branch.

Matagorda County: Plans are adequate. The plan references in Annex W and the additional tabs note that the Matagorda County Sheriff's Office and Communication Officers are responsible for establishing a 24-hour per day notification to and activation of emergency response personnel. Also these references list a very detailed alerting and notification dissemination system to the local officials, EOC staff, residents, and the primary and alternate equipment and method used to accomplish the notification process.

Plan Reference

State of Texas:

Annex D, Tab 1, Section VII.A.7-8

Annex D, Tab 1, Section VII.B.5

Procedure 13, Section III.A.2

Procedure 13, Section IV.A.1-3

Matagorda County:
Basic Plan Section V.B
Annex W Section V.B
Annex W Section V.C.1
Annex W Tab 1 Section IV.E and F
Annex W Tab 2 Section I and II

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.1.b Provision for communication with contiguous State/local governments within the Emergency Planning Zones;

Criterion Statement

State of Texas: Plans are adequate. Annex D, Appendix 2 briefly describes the State's capability of communicating with the local governments within its jurisdiction and with other State organizations within the ingestion IPZ. In Procedure 13, a quick reference phone list shows the contact, primary and secondary, for various local and State organizations that the Radiation Branch would be in contact with during an emergency, for example, DSHS at the SEOF or the Disaster Districts.

Matagorda County: Plans are adequate. Annex W, Tab 2 Section IV provides a list of communication links with other local governments within the plume EPZ and also other associated host and support organizations located outside the plume EPZ. The following categories were listed: Intra-County, County-to-County, County-State-Federal, Radiological Field Team, Reception Center, Congregate Care, Emergency Medical/ EMS, and Fire and Rescue. Each area also listed a primary and back-up means for communication.

Plan Reference

State of Texas:
Annex D, Appendix, 2, Section 2.h.3-4
Procedure 13, Attachment 3

Matagorda County:
Annex W, Tab 2, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.1.c Provision for communications, as needed, with Federal emergency response organizations;

Criterion Statement

State of Texas: Plans are adequate. There are provisions by which Federal agencies would be contacted during an incident at STP and those agencies listed are consistent with who would actually respond from the Federal side. There is, however, little information concerning the method by which these Federal organizations will be contacted. There is a list which includes the NRC headquarters contact number as well as EPA, but the EPA also has a regional contact number; there is nothing specifying which level of the responding, either headquarters or regional office, will be contacted.

Matagorda County: Plans are adequate. The local plan states that communications with Federal response organizations will be through the State.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 2.e.1-3

Annex D, Appendix 2, Section 2.h.5-6

Procedure 13, Section IV.H.2

Matagorda County:

Annex W, Tab 2, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.1.d Provision for communications between the nuclear facility and the licensee's near-site Emergency Operations Facility, State and local emergency operations centers, and radiological monitoring teams;

Criterion Statement

State of Texas: Plans are adequate. Procedure 13, Attachment 3 addresses multiple methods for communication. This is listed in the state NUREG cross-reference.

Matagorda County: Plans are adequate. Annex W, Tab 2 Section IV was provided and includes descriptions of the communications systems that will be used by the county with the EOF.

Plan Reference

State of Texas:

Annex D, Tab 1, Chapter 2, Section VII.B.1

Annex D, Tab 1, Chapter 2, Section VII.C.1

Procedure 10, Section VII.E.1-2

Procedure 13, Attachment 3

Matagorda County:

Basic Plan, Section V.B.2

Annex W, Section V.B

Annex W, Tab 2, Section IV.A and D

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.1.e Provision for alerting or activating emergency personnel in each response organization.

Criterion Statement

State of Texas: Plans are adequate. Procedure 13 has been provided which identifies the primary and backup methods for alerting and activating emergency personnel

Matagorda County: Plans are adequate. There is basic reference to a primary and back-up communication system for alerting or activating emergency personnel. Designation of the responsible party for notifying the emergency personnel is listed in the plans.

Plan Reference

State of Texas:
Annex D, Appendix 2, Section 2.b
Procedure 13, Section IV.D (c)
Procedure 13, Section IV.H, 1-3

Matagorda County:
Basic Plan, Section V.B.2
Basic Plan, Section VI
Annex W, Tab 2, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.2 Each organization shall ensure that a coordinated communication link for fixed and mobile medical support facilities exists.

Criterion Statement

State of Texas: Plans are adequate. Procedure 13 has been provided which addresses communications with fixed and mobile medical facilities.

Matagorda County: Plans are adequate. The plans identify the responsible party for communicating with mobile and fixed medical facilities in Matagorda County, Bay City, and the City of Palacios. Back-up and primary communication methods are listed and adequate to cover this criterion.

Plan Reference

State of Texas:
Annex B, Section VII.A
Annex D, Tab 1, Section IV
Procedure 5, Attachment 2
Procedure 13, attachment 3
Procedure 24, Section V.L

Matagorda County:
Basic Plan, Section V.B.2
Annex W, Section V.B
Annex W, Tab 2, Section IV.G

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- F.3 Each organization shall conduct periodic testing of the entire emergency communications system (see Evaluation Criteria H.10. and N.2.a., and Appendix 3).

Criterion Statement

State of Texas: Plans are adequate. A monthly drill is documented in this section of Annex D where the overall State communication system is tested on a monthly basis. Other daily communication drills include the radiological monitoring teams and State-to-Federal communication.

Matagorda County: Plans are adequate. Monthly communication drills are documented in Annex W, Tab 2 Section IV.I, which includes the link between the county, State, and the utility. Information concerning the responsible party for maintaining the drills and communication link is also listed in this section.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section II.B-C

Matagorda County:
Annex W, Section V.B.4
Annex W, Tab 2, Sections IV.I and J

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

G. Public Education and Information

Information is made available to the public on a periodic basis on how they will be notified and what their initial actions should be in an emergency (e.g., listening to a local broadcast station and remaining indoors), the principal points of contact with the news media for dissemination of information during an emergency (including the physical location or locations) are established in advance, and procedures for coordinated dissemination of information to the public are established.

G.1 Each organization shall provide a coordinated periodic (at least annually) dissemination of information to the public regarding how they will be notified and what their actions should be in an emergency. This information shall include, but not necessarily be limited to:

- a. educational information on radiation;
- b. contact for additional information;
- c. protective measures, e.g., evacuation routes and relocation centers, sheltering, respiratory protection, radioprotective drugs; and
- d. special needs of the handicapped.

Means for accomplishing this dissemination may include, but are not necessarily limited to: information in the telephone book; periodic information in utility bills; postings in public areas; and publications distributed on an annual basis.

Criterion Statement

State of Texas: Plans are adequate. Procedure 14 addresses annual dissemination of public information in details and meets the requirements of this criterion.

Matagorda County: Plans are adequate. The Matagorda County plan states that the Matagorda County PIO will disseminate coordinated information periodically (annually) to the public concerning notification, protective actions, special needs populations and who to contact for more information. The plan states that distribution of the information may include the mediums of telephone books, public area postings, annual publications and brochures.

Plan Reference

State of Texas:

Annex D, Tab 1, Section VII.F. 1,8

Annex D, Tab 1, Attachment 4, Section 1.B.9

Procedure 14, Attachment 3

Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.2 The public information program shall provide the permanent and transient adult population within the plume exposure EPZ an adequate opportunity to become aware of the information annually. The programs should include provision for written material that is likely to be available in a residence during an emergency. Updated information shall be disseminated at least annually. Signs or other measures (e.g., decals, posted notices, or other means placed in hotels, motels, gasoline stations, and phone booths) shall also be used to disseminate to any transient population within the plume exposure pathway EPZ appropriate information that would be helpful if an emergency or accident occurs. Such notices should refer the transient to the telephone directory or other source of local emergency information and guide the visitor to appropriate radio and television frequencies.

Criterion Statement

State of Texas: Plans are adequate. The proposed resolution for this item is provided in a procedure. The portion of the procedure referenced to address this item contains information for transient populations including the method for distribution of this information.

Matagorda County: Plans are adequate. The plan says the Matagorda County PIO will develop an educational program for residents and transients in the plume exposure pathway. It will include information on notification, EAS frequencies, protective actions, special needs populations, reception centers, and points of contact for more information. The information will be available through telephone directories, brochures and posted in public areas for transients.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section II.A.3
Procedure 14, Attachment 3

Matagorda County: Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.3.a Each principal organization shall designate the points of contact and physical locations for use by news media during an emergency.

Criterion Statement

State of Texas: The plan is adequate. The plan details the location and address of the JIC and the duties of State personnel who will work in it.

Matagorda County: The plan is adequate. The plan details the location of the JIC and the duties of the Matagorda County PIO in it.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section III.B.2
Annex D, Tab 1, Chapter2, Section VII.C.9
Procedure 13, Attachment 3
Procedure 14, Attachment 3

Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D
Annex W, Tab 5, Section III.B

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.4.a Each principal organization shall designate a spokesperson who should have access to all necessary information.

Criterion Statement

State of Texas: The plan is adequate. The plan designates a public information specialist and a technical spokesperson who will have access to RCP personnel in the STP EOF, the RCP staging area and the SOC in Austin via phone and fax.

Matagorda County: The plan is adequate. The plan designates Matagorda County's public information officer as the spokesperson and requires the spokesperson to coordinate information with public information representatives from STPEGS and the State of Texas at the JIC, as well as the Matagorda County Emergency Management Director.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section VII.C.8.

Matagorda County:
Basic Plan Section V, B.9.
Annex W, Section V.D
Annex W, Tab 5, Section III.B

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.4.b Each organization shall establish arrangements for timely exchange of information among designated spokespersons.

Criterion Statement

State of Texas: Plans are adequate. Referenced portions of the plan describe arrangements for timely exchange of information among designated spokespersons.

Matagorda County: Plans are adequate. The plan says the Matagorda County spokesperson will coordinate information in the JIC with representatives of the State of Texas, Department of Homeland Security and the Nuclear Regulatory Commission. The word "timely" is not mentioned but is assumed during emergency conditions.

Plan Reference

State of Texas:
Annex D, Tab 1, Section VII.A.6-7

Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.4.c Each organization shall establish coordinated arrangements for dealing with rumors.

Criterion Statement

State of Texas: The plans are adequate. The State plan references procedures that describe actions to be taken in response to an incident at STP including coordinated efforts to address rumors.

Matagorda County: The plans are adequate. The plan states that the Matagorda County PIO or designee will monitor the news and correct rumors. Identified or suspected rumors will be shared with the JIC.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section III.B.2.

Matagorda County:
Basic Plan, Section V.B.9
Annex W, Section V.D
Annex W, Tab 5, Section III.C

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- G.5 Each organization shall conduct coordinated programs at least annually to acquaint news media with the emergency plans, information concerning radiation, and points of contact for release of public information in an emergency.

Criterion Statement

State of Texas: Plans are adequate. The plan addresses the State's participation in training programs in which the media will be provided information on basic radiation, emergency plans, or points of contact for emergency public information.

Matagorda County: The plans are adequate. The plan says the Matagorda County PIO, in coordination with the State and STP, will hold annual training for the media in which the media will be informed of points of contact, information about radiation, and emergency public information.

Plan Reference

State of Texas:

Annex D, Tab 1, Section VII.A.14

Annex D, Tab 1, Attachment 4, Section I.B.9

Annex D, Tab 1, Attachment 4, Section II.A

Matagorda County:

Basic Plan, Section V.D. 5

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H. Emergency Facilities and Equipment
Adequate emergency facilities and equipment to support the emergency response are provided and maintained.
- H.3 Each organization shall establish an emergency operations center for use in directing and controlling response functions

Criterion Statement

State of Texas: Plans are adequate. The State Plan says that a State Operations Center for GDEM is located at the Department of Public Safety Headquarters, 5805 N. Lamar Blvd., Austin, TX., and is used for overall coordination of activities at the State level during an emergency. A second EOC for the Disaster District Sub 2C is located at the DPS office in Pierce, TX.

Matagorda County: Plans are adequate. The plan says the EOC will be at the Matagorda County Sheriff's Office in Bay City and an alternate EOC is located at the Matagorda County Courthouse.

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section III.C.1-2
Annex D, Tab 1, Chapter 2, Attachments 9-10
Procedure 10, Section VII
Procedure 11, Section VII

Matagorda County:
Basic Plan, Section IV.C
Annex W, Section III. 11;
Annex W, Section IV. B;
Annex W, Tab 9

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H.4 Each organization shall provide for timely activation and staffing of the facilities and centers described in the plan.

Criterion Statement

State of Texas: Plans are adequate. The State will provide support and assistance as quickly and efficiently as feasible. When lives and property are immediately threatened, the most rapid means of response will be taken. DSHS will contact an initial Accident Assessment Team who assembles at the Exchange Bldg., Austin, TX. They maintain communications with STP, and Field Operations. Other RCP teams for the first shift are deployed to their duty stations. During initial deployment of DSHS personnel, STP will conduct necessary offsite monitoring.

Matagorda County: Plans are adequate. The EOC located at the Matagorda County Sheriff's Office, Bay City will be activated upon notification from STP of an emergency. The EOC will be staffed by the authority of the Emergency Management Director as per procedures based on the emergency classification level. Annex W, Tab 9, Section IV has detailed information on activation and staffing of the Matagorda County EOC.

Plan Reference

State of Texas:
Annex D, Section IV.B.1
Annex D, Tab 1, Chapter 2, Section V - VII
Procedure 13, Section IV.B

Matagorda County:
Basic Plan, Section IV.C
Annex W, Section VI
Annex W, Tab 1, Section IV

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H.7 Each organization, where appropriate, shall provide for offsite radiological monitoring equipment in the vicinity of the nuclear facility.

Criterion Statement

State of Texas: Plans are adequate. The State plan and implementing procedures list the type of equipment that will be provided by the State for the purposes of offsite radiological monitoring in the vicinity of a nuclear facility.

Matagorda County: Plans are adequate. Under the State and county plans, the Texas Department of State Health Services (DSHS) is responsible for providing for offsite radiological monitoring. The county officials will be prepared to offer assistance to the State if requested and if resources are available.

Plan Reference

State of Texas:

Procedure 3, Section IV.A

Procedure 5, Section IV.A-B

Procedure 7, Section IV.A-C

Procedure 7, Section VII.E

Procedure 10, Section V

Procedure 10, Attachment 1

Procedure 10, Tab 1, Section III

Procedure 11, Section V

Procedure 24, Section IV.A-F

Procedure 25, Section IV.A-D

Matagorda County:

Annex W Section V.E

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H.10 Each organization shall make provisions to inspect, inventory, and operationally check emergency equipment/instruments at least once each calendar quarter and after each use. There shall be sufficient reserves of instruments/equipment to replace those that are removed from emergency kits for calibration or repair. Calibration of equipment shall be at intervals recommended by the supplier of the equipment.

Criterion Statement

State of Texas: Plans are adequate. Provisions to inspect, inventory, and operationally check instrumentation are addressed in implementing procedures. The procedures also specify the frequency of the inspection and require that field instruments be inspected and operationally checked prior to use. Reserve equipment to supplement equipment removed for calibration is accounted for in procedures.

Matagorda County: Plans are adequate. The Matagorda County Radiological Emergency Management Plan makes provisions for equipment to be checked, inventoried, and inspected quarterly. The plan also indicates that if equipment is provided through the Texas Department of State Health Services (DSHS) or STP Electric Generating Station, then those agencies/businesses will be responsible for the maintenance of that equipment. The county plan does not clearly state what inventory is owned by the county nor does it address the issue of calibration and reserve equipment owned by the county in any of the references provided.

Plan Reference

State of Texas:

Annex D, Tab 1, Attachment 4, Section I.B.10

Procedure 10, Section VIII.C.4

Procedure 10, Attachments 4 & 5

Procedure 11, Section VIII.C.1 and 5

Matagorda County:

Basic Plan Section V.B.4

Annex W Section V.M

Annex W Section V.M Figure 3

Annex W Tab 4 Section IV.B

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H.11 Each plan shall, in an appendix, include identification of emergency kits by general category (protective equipment, communications equipment, radiological monitoring equipment, and emergency supplies).

Criterion Statement

State of Texas: Plans are adequate. The State plan and procedures include detailed lists of equipment at the specified functions/stations. Not all functions/stations require emergency supplies. The information is well documented throughout the Procedures.

Matagorda County: Plans are adequate – corrections must be made. Figure 3, Emergency Radiological Equipment List, is a portion of the required emergency kits information. In addition, the plan references a site procedure which lists equipment in detail that will be available in response kits.

Plan Reference

State of Texas:

Procedure 1, Section IV.A;
Procedure 3, Section IV.A-C;
Procedure 4, Section IV.A-I;
Procedure 5, Section IV.C-Z;
Procedure 6, Section IV.A-E;
Procedure 7, Section IV.D;
Procedure 8, Section IV.A-C;
Procedure 9, Section IV.A;
Procedure 10, Attachments 1 & 2;
Procedure 10, Tab 1-5 Section III;
Procedure 11, Section XII.A-E and Attachments 1-3;
Procedure 24, Attachment 1
Procedure 26, Section IV.A-K.

Matagorda County:

Annex W, Section V.M Figure 3
Annex W, REP Procedures.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- H.12 Each organization shall establish a central point (preferably associated with the licensee's near-site Emergency Operations Facility), for receipt and analysis of all field monitoring data and coordination of sample media.

Criterion Statement

State of Texas: Plans are adequate. The State has access to the DSHS main laboratory in Austin in addition to having an equipped mobile laboratory staged at the Bay City Civic Center. Both labs are set-up to receive and process all samples collected by the Field Monitoring Teams. The mobile lab can be re-located at the discretion of the Chief of Field Operations. The Analysis Teams have communications capabilities of commercial telephones and a department radio and runner. Forms for documenting and processing samples are contained in Procedure 10.

Matagorda County: Plans are adequate. Matagorda County does not have the primary responsibility for assessment of radiological incidents; this is deferred to the State. The local officials will provide assistance upon request from the State.

Plan Reference

State of Texas:

Annex D, Tab 1, Chapter 2, Section VII.C.4-5

Procedure 10, Attachment 7

Procedure 10, Tab 1, Section V

Procedure 10, Tab 2, Section V.b

Procedure 10, Tab 3, Section V.a

Procedure 10, Tab 4, Section V.a

Procedure 10, Tab 5, Section V.b

Matagorda County:

Annex W, Section V.E

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

I. Accident Assessment

Adequate methods, systems, and equipment for assessing and monitoring actual or potential offsite consequences of a radiological emergency condition are in use.

- I.7 Each organization shall describe the capability and resources for field monitoring within the plume exposure Emergency Planning Zone that are an intrinsic part of the concept of operations for the facility.

Criterion Statement

State of Texas: Plans are adequate. The plan references contain information that describe the composition of field monitoring teams, number of teams per shift, types of samples collected, and surveys to be taken in both the plume exposure Emergency Planning Zone (EPZ) and the Ingestion Pathway planning zone.

Matagorda County: Plans are adequate. The county plan defers the responsibility of field monitoring to the State, but does provide for support when requested and if resources are available.

Plan Reference

State of Texas:

Annex D, Section III.G.1 and 3

Annex D, Section V.B.1.e

Annex D, Sections V.B.3.c, d.(3), e.(2), and f

Annex D, Tab 1, Attachments 2 & 3

Annex D, Tab 1, Section VII.B.5

Annex D, Tab 1, Section VII.C.2-5

Annex D, Tab 1, Section VII.E.3

Annex D, Tab 1, Chapter 2, Section VI (last sentence of first paragraph)

Annex D, Tab 1, Chapter 2, Section VII.B.1

Annex D, Tab 1, Chapter 2, Section VII.C.2-3 & 9

Matagorda County:

Annex W Section V.E

(Deferred to State)

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- I.8 Each organization, where appropriate, shall provide methods, equipment and expertise to make rapid assessments of the actual or potential magnitude and locations of any radiological hazards through liquid or gaseous release pathways. This shall include activation, notification means, field team composition, transportation, communication, monitoring equipment, and estimated deployment times.

Criterion Statement

State of Texas: Plans are adequate. The plan describes the methods for activation and notification of field teams. It also describes the type of equipment to be used. The composition of teams, deployment times, transportation and communication are all addressed in the plan. Methods for performing duties such as deployment, surveys, and sample collection are described in Procedure 10.

Matagorda County: Plans are adequate. The county plan defers the responsibility of field monitoring to the State, but does provide for support when requested and if resources are available.

Plan Reference

State of Texas:

Annex D, Section IV.E.1-2

Annex D, Tab 1, Chapter 2, Section VI

Annex D, Tab 1, Chapter 2, Section VII.B.1-2

Annex D, Tab 1, Chapter 2, Section VII.C.3

Procedure 10

Matagorda County:

Annex W Section V.E

(Deferred to State)

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- I.9 Each organization shall have a capability to detect and measure radioiodine concentrations in air in the plume exposure EPZ as low as 10-7 μ Ci/cc (microcuries per cubic centimeter) under field conditions. Interference from the presence of noble gas and background radiation shall not decrease the stated minimum detectable activity.

Criterion Statement

State of Texas: Plans are adequate. The State plan clearly identifies the ability and method used by field teams to measure radioiodine concentration in air to the minimum detectable activity of 7 – 10 $\mu\text{Ci/cc}$. The method for equipment assembly and operation is described in detail. The formula used to convert the field measurements is described in the referenced plan sections. The equipment and supply list was not included in the plan reference, but is addressed in Section III of Procedure 10. It may be appropriate to include Section III of Procedure 10 in the plan cross-reference.

Matagorda County: Not Applicable

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, Section VII.C.3
Procedure 10

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- I.10 Each organization shall establish means for relating the various measured parameters (e.g., contamination levels, water, and air activity levels) to dose rates for key isotopes (i.e., those given in Table 3, page 18) and gross radioactivity measurements. Provisions shall be made for estimating integrated dose from the projected and actual dose rates and for comparing these estimates with the protective action guides. The detailed provisions shall be described in separate procedures.

Criterion Statement

State of Texas: Plans are adequate. The State plan establishes a means for relating measurements from contamination and activity levels to dose rates. The State will use site specific computer modeling systems or manual calculation methods described in the EPA 400-R-92-001. The details of the methods for dose calculation and analysis are described in implementing procedures.

Matagorda County: Not Applicable

Plan Reference

State of Texas:

Annex D, Section IV.F.1

Annex D, Tab 1, Chapter 2, Section VII.C.6

Procedure 1, Section IV.A

Procedure 1, Section VII.B

Procedure 10, Tab 1, Section VI.a-b

Procedure 11, Section IX.A

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- I.11 Arrangements to locate and track the airborne radioactive plume shall be made, using either or both Federal and State resources.

Criterion Statement

State of Texas: Plans are adequate. The plan does not specifically state if peak plume measurements will be taken by State field teams or another organization, however, current guidance does not require peak measurements. If arrangements exist to use Federal, or applicant resources for taking peak plume measurements, they should be clearly identified and letters of agreement, where applicable, should be referenced.

Matagorda County: Not Applicable

Plan Reference

State of Texas:

Annex D, Section IV.E.2.(2)

Annex D, Section V.B.2.f

Annex D, Tab 1, Section VI.B.6

Annex D, Tab 1, Chapter 2, Section VII.C.2-4

Procedure 10, Section II

Procedure 10, Section IX-X

Procedure 11, Section II

Procedure 11, Section XI.A-B

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

J. **Protective Response**

A range of protective actions have been developed for the plume exposure pathway EPZ for emergency workers and the public. [In developing this range of actions, consideration has been given to evacuation, sheltering, and as a supplement to these, the prophylactic use of potassium iodide (KI), as appropriate.]³⁶ Guidelines for the choice of protective actions during an emergency, consistent with Federal guidance, are developed and in place, and protective actions for the ingestion exposure pathway EPZ appropriate to the locale have been developed.

- J.2 Each licensee shall make provisions for evacuation routes and transportation for onsite individuals to some suitable offsite location, including alternatives for inclement weather, high traffic density, and specific radiological conditions.

Criterion Statement

State of Texas: Plans are adequate. Annex D at Section VII., F.1 and 4, cites the responsibility of the local government to warn and notify the public and to provide law enforcement and traffic control within the affected area. Chapter 2, Attachment 5 is the evacuation route map for STP.

Matagorda County: Plans are adequate. The Basic Plan and Annex W cite the responsibilities of local law enforcement to coordinate and direct evacuation of emergency areas as ordered by the Matagorda County Emergency Management Director (County Judge). Annex W, Tab 3, Section III.B.3 concerns the evacuation of STP onsite personnel and how assistance will be provided by Matagorda County officials. Traffic control and law enforcement will be established by the County Sheriff and the Communications Officer per Annex W, Section V.I. with mass transportation coordinated by the Transportation Officer per Section V.K. Tab 3 addresses evacuation and Tab 8 (Transportation), Section III.C., addresses the need for vehicle monitoring and decontamination at reception centers.

Plan Reference

State of Texas:

Annex D, Tab 1, Section IV (reference)
Annex D, Tab 1, Section VII.F.1 and 4
Annex D, Tab 1, Chapter 2, Attachment 5
Annex E, Section IV A & H

Matagorda County:

Basic Plan, Section V.B.7
Annex W, Section V.A
Annex W, Section V.I
Annex W, Section V.K
Annex W, Tab 3, Section III.B.3
Annex W, Tab 8, Section III.C

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.9 Each State and local organization shall establish a capability for implementing protective measures on the basis of Protective Action Guides and other criteria. This shall be consistent with the recommendations of the EPA regarding exposure resulting from passage of radioactive airborne plumes, (EPA-520/1-75-001) and with those of DHEW (DHHS)/ FDA regarding radioactive contamination of human food and animal feeds as published in the Federal Register of December 15, 1978 (43 FR 58790).

Criterion Statement

State of Texas: Plans are adequate. The method by which PARs are communicated to the locals is identified in the plan. Organizations responsible for decision making during the ingestion exposure pathway are identified.

Matagorda County: Plans are adequate. The plan describes the process for implementing PADs.

Plan Reference

State of Texas:

Annex D, Section IV.A. 3-4, E.2.(4) & F.1(2)

Annex D, Section V.B.2.f

Annex D, Tab 1, Chapter 2, Section VII.C.6

Procedure 1, Section VII.B-C

Procedure 1, Attachments 1-4

Procedure 2, Section III

Procedure 2, Section IV.A.3

Procedure 10, Section VIII.F.3-5

Procedure 11, Section VIII.F.3

Procedure 11, Section IX.A

Procedure 24, Section V.A-G

Matagorda County:

Annex W Section V.A

Annex W Section V.D

Annex W Section V.E

Annex W Section V.L

Annex W Section V.U

Annex W Tab 4 All

Procedure 14

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.a Maps showing evacuation routes, evacuation areas, pre-selected radiological sampling and monitoring points, relocation centers in host areas, and shelter areas (identification of radiological sampling and monitoring points shall include the designators in Table J-1 or an equivalent uniform system described in the plan)

Criterion Statement

State of Texas: Plans are adequate. The State plan includes maps that clearly identify evacuation routes, evacuation areas, pre-selected monitoring points, and reception centers, and locations of shelters.

Matagorda County: Plans are adequate. The county plan includes a map that shows the location of shelters and reception centers, and also identifies the frequency at which the maps will be updated.

Plan Reference

State of Texas:

Evacuation Routes

Annex D, Tab 1, Chapter 2, Attachment 5

Evacuation Areas (Emergency Response Zones)

Annex D, Tab 1, Chapter 2, Attachment 4

Pre-Selected Monitoring Points

Annex D, Tab 1, Chapter 2, Attachment 3

Relocation Centers & Shelter Areas

Annex D, Tab 1, Chapter 2, Attachments 9-10

Matagorda County:

Annex W Figure 1

Annex W Section V.E

Annex W Tab 3 Figures 1, 2, and 3

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.b Maps showing population distribution around the nuclear facility. This shall be by evacuation areas (licensees shall also present the information in a sector format);

Criterion Statement

State of Texas: Plans are adequate. The plan has maps that show evacuation zones and special populations such as day cares and schools.

Matagorda County: Plans are adequate. The county plan references maps that identify evacuation as well as special population information.

Plan Reference

State of Texas:

Annex D, Tab 1, Chapter 2, Attachment 4.

Matagorda County:

Annex W, Tab 3, Figure 3.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.c Means for notifying all segments of the transient and resident population

Criterion Statement

State of Texas: Plans are adequate. The state plan references Procedure 14 which includes information on establishing administrative and physical means, and times required for notifying and providing prompt instruction to the public within the EPZ. In addition, the procedure contains draft messages that would inform the public of protective actions consistent with the utility's Emergency Classification Levels (ECL).

Matagorda County: Plans are adequate. The plan details how the resident and transient populations of Matagorda County will be notified by siren (the plan includes a siren location map), EAS, Community Alert Network (reverse 911), route alerting, law enforcement teletype, and PA at industrial facilities. Planning Standards E5, E6 and E7 are adequate to fulfill the requirements of J10c and for Matagorda County.

Plan Reference

State of Texas:
Annex D, Tab 1, Section VII, A.3, B.6 and F 1-3
Procedure 1, Section VII.B 1-2
Procedure 14, Attachment 2

Matagorda County:
Annex W, Tab 1, Section III
Annex W, Tab 1, Figure 1

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.d Means for protecting those persons whose mobility may be impaired due to such factors as institutional or other confinement;

Criterion Statement

State of Texas: Plans are adequate. The plan includes a cross-reference that identifies the organization responsible for protection of those persons who are mobility impaired, including protective measures such as the method for alerting, providing emergency information, and transporting mobility dependent or impaired individuals.

Matagorda County: Plans are adequate. The plan references a procedure which addresses institutions with mobility issues such as schools, prisons, or hospital and includes information describing protective measures such as the method for alerting, providing emergency information, and transporting mobility dependent or mobility impaired individuals from schools, hospitals, and prisons.

Plan Reference

State of Texas:

Annex D, Tab 1, Section VII, A.13

Annex E, Section IV.C.4

Annex E, Section IV.I

Annex E, Section IV.J.1.d

Annex E, Section IV.A.7.c

Annex E, Section V.3.e.3

Procedure 9, Section VIII.A (last sentence.)

Matagorda County:

Annex W, Section V.D.13;

Annex W Tab 7, Section IV, C and D;

Annex W, Tab 8, Section III B.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.e Provisions for the use of radioprotective drugs, particularly for emergency workers and institutionalized persons within the plume exposure EPZ whose immediate evacuation may be infeasible or very difficult, including quantities, storage, and means of distribution.

Criterion Statement

State of Texas: Plans are adequate. The plan describes the quantity and location of storage of KI. It also provides doses at which KI will be recommended for use by emergency workers and institutionalized members of the public who cannot be evacuated in accordance with federal guidelines. The plan describes how the recommendation to ingest KI to emergency workers and institutionalized individuals will be communicated to the county.

Matagorda County: Plans are adequate. The plan reference contains specific information on the policies and use of radioprotective drugs. The plan identifies who (at the county) can authorize the use of KI, to whom KI can be issued, how it will be distributed, as well as where it is maintained. There is also information regarding the quantities of KI to be maintained for use at the county and how the inventory of KI is maintained.

Plan Reference

State of Texas:
Annex D, Tab 1, Section VII.A.13
Procedure 1, Section VII.B.2.d
Procedure 1, Attachments 1-2
Procedure 9, Section 1
Procedure 9, Section II.C
Procedure 9, Section VII.A, VII.B.1
Procedure 9, Attachment 3

Matagorda County:
Annex W Section V.M.2
Matagorda County Procedure 41 & 42
Procedure OPGP05-ZV-0012

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.f State and local organizations' plans should include the method by which decisions by the State Health Department for administering radioprotective drugs to the general population are made during an emergency and the pre-determined conditions under which such drugs may be used by offsite emergency workers.

Criterion Statement

State of Texas: Plans are adequate. Procedure 9 identifies by title the decision makers that can recommend administration of radioprotective drugs. The State does not authorize the use of KI for the general public, but the plans do make provisions for authorizing KI for institutionalized workers.

Matagorda County: Plans are adequate to meet criterion J.10.f. The county plans contain details and provide descriptions of decision-making processes that might be used by the county when recommending administration of radioprotective drugs.

Plan Reference

State of Texas:
Procedure 1, Section VII.B.2.d
Procedure 1, Attachments 1-2
Procedure 8, Section II.B (last sentence)
Procedure 9, Section V.D-E
Procedure 9, Section VII.A
Procedure 24, Section V.G
Procedure 24, Section VIII.C.4

Matagorda County:
Annex W Section V.M.2

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.g Means of relocation.

Criterion Statement

State of Texas: Plans are adequate. The plan does provide information on the means to relocate the public, transportation resources, or designated pickup points for individuals in need of transportation.

Matagorda County: Plans are adequate. Annex W Section V.K establishes the means to relocate the public and describes mass transportation and resources.

Plan Reference

State of Texas:

Annex E, Section IV.H

Annex E, Section V.B.3.b.7 & 10

Annex E, Section V.B.3.d.1

Annex S, Section IV.E.2

Annex S, Appendix 4

Procedure 1, Section VII.B.2.a

Procedure 25, Section VIII

Matagorda County:

Annex W, Section V.K

Annex W, Tab 8, Section III

Annex W, Tab 3, Figures 5 and 6

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.h Relocation centers in host areas which are at least 5 miles, and preferably 10 miles, beyond the boundaries of the plume exposure emergency planning zone (see J.12).

Criterion Statement

State of Texas: Plans are adequate. The State plan identifies Bay City and Palacios as the primary and alternate locations for relocation centers. The exact locations are not mentioned as host jurisdictions in the State plan; however, the locations are established in the county plans.

Matagorda County: Plans are adequate. The Matagorda County Emergency Management Plan clearly identifies a primary reception center, alternate reception center, and numerous congregate care facilities that are at least 5 miles beyond the boundaries of the plume exposure emergency planning zone.

Plan Reference

State of Texas:

Annex D. Tab 1, Chapter 2, Section II.A.3

Annex D. Tab 1, Chapter 2, Section VII.C.10

Matagorda County:

Annex W, Tab 7, Figures 1 and 2

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.i Projected traffic capacities of evacuation routes under emergency conditions.

Criterion Statement

State of Texas: Plans are adequate. Annex E discusses traffic capacity and evacuation routes.

Matagorda County: Plans are adequate. Annex W Tab 3 Section III.C clearly identifies the personnel and resources to handle traffic control. Additionally, Annex W Tab 3 Section III.F identifies the zones by a number system and indicates the estimated evacuation time for the EPZ.

Plan Reference

State of Texas:

Procedure1, Section VII.D (last sentence)

Annex E, Section IV.C.3

Matagorda County:

Annex W Tab 3 Section III.C

Annex W Tab 3 Section III.F

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.j Control of access to evacuated areas and organization responsibilities for such control.

Criterion Statement

State of Texas: Plans are adequate. All references listed clearly identify the organizations responsible for controlling access to evacuated areas and the setup of the TCPs/ACPs.

Matagorda County: Plans are adequate. The plan adequately addresses the organizations responsible for controlling access to evacuation routes including equipment and set up of TCPs/TACPs.

Plan Reference

State of Texas:

Annex D. Section IV.1.3-4

Annex D. Tab 1, Chapter 2, Section VII.C.7

Procedure 24, Section II (second paragraph)

Procedure 24, Section VIII.C.1

Matagorda County:

Basic Plan Section V.B.7

Annex W, Section V.I

Annex W, Tab 3, Section III.C

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.k Identification of and means for dealing with potential impediments (e.g., seasonal impassability of roads) to use of evacuation routes, and contingency measures.

Criterion Statement

State of Texas: Plans are adequate. Procedure 24, Section VIII.C.2.b.c.d and h designates Law Enforcement personnel responsible for directing and rerouting traffic.

Matagorda County: Plans are adequate. The plan describes the resources available for dealing with impediments or rerouting traffic.

Plan Reference

State of Texas:
Procedure 24, Section VIII.C.2.b,c,d and h

Matagorda County:
Annex W, Tab 3, III.C.6

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.10.l Time estimates for evacuation of various sectors and distances based on a dynamic analysis (time-motion study under various conditions) for the plume exposure pathway emergency planning zone (see Appendix 4).

Criterion Statement

State of Texas: Plans are adequate. The State plan cross-reference refers to the ETE study included in the application. The plan should also be updated to include a reference to the ETE study at an appropriate place in the body of the plan.

Matagorda County: The plans are adequate. The plans indicate an estimated evacuation time for the movement of school children and other special populations.

Plan Reference

State of Texas:
Evacuation Time Estimate

Matagorda County:
Annex W Tab 3 Section III.C
Annex W Tab 3 Section III.F
Annex W Tab 3 Figure 2

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

J.10.m The bases for the choice of recommended protective actions from the plume exposure pathway during emergency conditions. This shall include expected local protection afforded in residential units or other shelter for direct and inhalation exposure, as well as evacuation time estimates.

Criterion Statement

State of Texas: Plans are adequate. Annex D, Tab 1 assigns the responsibilities for protective action decision making to the county.

Matagorda County: Plans are adequate. The plan provides a reference to the information describes the basis for the choice to implement a particular recommendation.

State of Texas:
Annex D, Tab 1, Section VII.F.2, 5, 6, 7, & 9
Procedure 1, VII.B.2.a-e

Matagorda County:
Annex W, Tab 3
Annex W, Tab 4
Procedure 14

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- J.11 Each State shall specify the protective measures to be used for the ingestion pathway, including the methods for protecting the public from consumption of contaminated food-stuffs. This shall include criteria for deciding whether dairy animals should be put on stored feed. The plan shall identify procedures for detecting contamination, for estimating the dose commitment consequences of uncontrolled ingestion, and for imposing protection procedures such as impoundment, decontamination, processing, decay, product diversion, and preservation. Maps for recording survey and monitoring data, key land use data (e.g., farming), dairies, food processing plants, water sheds, water supply intake and water treatment plants and reservoirs shall be maintained. Provisions for maps showing detailed crop information may be made by including reference to their availability and location and a plan for their use. The maps shall start at the facility and include all of the 50-mile ingestion pathway EPZ. Up-to-date lists of the name and location of all facilities which regularly process milk products and other large amounts of food or agricultural products originating in the ingestion pathway Emergency Planning Zone, but located elsewhere, shall be maintained.

Criterion Statement

State of Texas: Plans are adequate. The plans identify specific individuals (by title and/or position) that have the authority to make protective action decisions in the ingestion planning zone. Methodology to be used in designating the areas of concern where monitoring and sampling are to be implemented are discussed in the referenced plans (were found in Procedure 10). Additionally there was specific information included on how agribusinesses will be notified of protective action decisions that could affect their ability to sell or move food or products.

Matagorda County: Not Applicable

Plan Reference

State of Texas:
Annex D, Section IV.A.3
Annex D, Section IV.E.1 - 2
Annex D, Tab 1, Section VII.C & E
Procedure 2
Procedure 10, Section II

Matagorda County: Not Applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not Applicable**

- J.12 Each organization shall describe the means for registering and monitoring of evacuees at relocation centers in host areas. The personnel and equipment available should be capable of monitoring within about a 12-hour period all residents and transients in the plume exposure EPZ arriving at relocation centers.

Criterion Statement

State of Texas: Plans are adequate. The State plan delegates the responsibility of the reception center to the county, but does provide technical personnel to assist at the reception centers with advice and monitoring capabilities as needed. The State plan clearly defines action levels to be used in determining when decontamination is needed for both personnel and vehicles. The State plan also refers to procedures that describe proper monitoring technique.

Matagorda County: Plans are adequate. The county plan includes a reference to a procedure in which monitoring techniques, contamination control, and reception center layout diagrams are described.

Plan Reference

State of Texas:
Annex D, Section IV.H.2
Procedure 25, Section VIII.A-B

Matagorda County:
Annex W Tab 3 Section III.D and III.E
Annex W Tab 7 Section IV.B

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

K. Radiological Exposure Control

Means for controlling radiological exposures, in an emergency, are established for emergency workers. The means for controlling radiological exposures shall include exposure guidelines consistent with EPA Emergency Worker and Lifesaving Activity Protective Action Guides.

- K.3.a Each organization shall make provision for 24-hour-per-day capability to determine the doses received by emergency personnel involved in any nuclear accident, including volunteers. Each organization shall make provisions for distribution of dosimeters, both self-reading and permanent record devices.

Criterion Statement

State of Texas: Plans are adequate. The plan provides for the ability to determine doses received by emergency personnel 24 hours a day. In addition, the plan indicates the quantities of dosimetry that must be maintained and where the dosimetry is stored (ready for issue).

Matagorda County: Plans are adequate. The plans identify a reference to state guidelines that specify frequencies at which dosimeters will be read. The plans also provide details regarding the quantities of dosimetry that should be maintained and locations where dosimeters will be stored (both permanent record and self-reading).

Plan Reference

State of Texas:

Annex D, Tab 1, Chapter 2, Section VII.C.4 (second paragraph)

Annex D, Tab 1, Chapter 2, Section VII.C.7 (middle of 4th paragraph)

Procedure 7, Section VII.D.8

Procedure 7, Section VII.E.1-6

Procedure 10, Section VIII.F.1

Procedure 11, Section VIII.F

Procedure 24, Section V.H

Procedure 25, Section IV.A-C

Procedure 25, Section VII.G

Matagorda County:

Annex W Section V.M

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- K.3.b Each organization shall ensure that dosimeters are read at appropriate frequencies and provide for maintaining dose records for emergency workers involved in any nuclear accident.

Criterion Statement

State of Texas: Plans are adequate. The plan references a procedure that requires dosimeters to be read and recorded at intervals of approximately every 30 minutes

Matagorda County: Plans are adequate. The county plans require dosimeters to be read at "frequencies specified by State guidelines," and dose records to be "maintained in accordance with State guidelines." Procedure 42 indicates what those guidelines are for reading and recording dosimeters.

Plan Reference

State of Texas:
Procedure 7, Section VII.D.2-5
Procedure 10, Section VIII.F.3 and 7
Procedure 24, Section V.1
Procedure 25, Section V.H

Matagorda County:
Annex W Section V.M

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- K.4 Each State and local organization shall establish the decision chain for authorizing emergency workers to incur exposures in excess of the EPA General Public Protective Action Guides (i.e., EPA PAGs for emergency workers and lifesaving activities).

Criterion Statement

State of Texas: Plans are adequate. The State plan clearly identifies the individual responsible for authorizing emergency workers to incur exposures in excess of EPA PAGs. This responsibility is assigned to the Chief Field Officer or designee for exceeding dose limits for daily exposures or overall response exposures. The plan identifies the dose limits for missions and describes the procedure to receive permission to exceed shift, daily and overall response limits. The plan does provide information on risks for those emergency workers who voluntarily exceed the limits, as well as conditions that require additional limitations, such as a pregnant emergency worker.

Matagorda County: Plans are adequate. Procedure 42 describes the actions to be taken for an emergency worker to exceed exposure limits. The county plan identifies the individual assigned to approve exposure levels of responders and also identifies current EPA guidance and information from DSHS as being the limits that the county will use.

Plan Reference

State of Texas:

Procedure 1, Attachments 3-4

Procedure 7, Section VII.A-C

Procedure 7, Section VII.A

Procedure 10, Section VI.A

Procedure 10, Section VIII.F.4-5

Procedure 11, Section VI.A-B

Procedure 24, Section V.A-F

Procedure 25, Section V.A-E

Matagorda County:

Annex W Section V.A.9

Annex W Section V.M

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- K.5.a Each organization as appropriate, shall specify action levels for determining the need for decontamination.

Criterion Statement

State of Texas: Plans are adequate. The State plan identifies facilities for monitoring and decontamination of emergency workers and equipment. Procedures for proper monitoring of the emergency worker are clearly described and contamination levels that require decontamination are also identified in the State plan. The plan does identify the instruments that will be used for contamination surveys Procedure 5.

Matagorda County: Plans are adequate. The county plan identifies the locations of facilities that will be used for monitoring and decontamination. It also refers to State plans for determining levels at which decontamination is needed. The plan also references, in a tab, the procedure to be used for monitoring personnel or equipment, controlling the spread of contamination, and describes the instruments that are expected to be used for the purpose of monitoring.

Plan Reference

State of Texas:
Annex D, Section H
Procedure 5
Procedure 10, Section VIII.D
Procedure 11, Section X
Procedure 24, Section VIII.D.1.d-e.and 2.b
Procedure 25, Section VIII.B.2.c-f
Procedure 25, Section IX.C.2

Matagorda County:
Annex W Tab 3 Section III.B and III.E

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- K.5.b Each organization, as appropriate, shall establish the means for radiological decontamination of emergency personnel wounds, supplies, instruments and equipment, and for waste disposal.

Criterion Statement

State of Texas: Plans are adequate. The State plan describes the entry and exit procedures from the restricted area to control contamination. Equipment and anti-contamination supplies for DSHS emergency workers are described in the procedure. Procedure 25 also describes the proper method for collecting, storing, and disposing of contaminated waste. The references included for this element of the planning standard also describe the proper procedure for monitoring and decontaminating people or equipment or the criteria used to determine when medical treatment is necessary for contaminated persons. These activities are described in Procedure 5.

Matagorda County: Plans are adequate. The county plan provides for equipment such as dosimetry, survey instruments, and KI to be available for emergency workers. The plan also identifies special facilities, including reception centers at which monitoring and decontamination is provided. Disposal of contaminated waste accumulated from the process of monitoring and decontamination is also addressed in the plan. The addresses the specific procedure to be used for monitoring and decontamination of persons or equipment, nor does it identify the method used to document contamination readings on people or equipment.

Plan Reference

State of Texas:
Annex D, Section IV.H.1
Procedure 5
Procedure 10, Section XII.C-D
Procedure 25, Section VII.B.2.g-h
Procedure 25, Section VII.B.5.j
Procedure 25, Section VII.C.2

Matagorda County:
Annex W Section V.J
Annex W Section V.M
Annex W Tab 3 Section III.D
Annex W Tab 7 Section IV.B.3

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- L. **Medical and Public Health Support**
Arrangements are made for medical services for contaminated injured individuals.
- L.1 Each organization shall arrange for local and backup hospital and medical services having the capability for evaluation of radiation exposure and uptake, including assurance that persons providing these services are adequately prepared to handle contaminated individuals.

Criterion Statement

State of Texas: Plans are adequate. Department of State Health Services is designated in the plan as the primary agency for the Radiological Emergency Management ESF and is tasked with providing advice and assisting medical personnel in the treatment of radiation accident victims. The plan designates Law Enforcement Officers with the task of contacting the County EOC to determine location of hospital or facility. One primary and one back-up medical facility are designated in the referenced portions of the plan.

Matagorda County: Plans are adequate. Responsible parties are identified in the Basic Plan who are tasked with coordinating efforts in providing emergency medical care for the public. The plan identifies the local hospital and County EMS service available for support for treatment of a contaminated individual or radiological emergency.

Plan Reference

State of Texas:
Annex D, Section V.B.2.g
Annex D, Tab 1, Chapter 2, Section III.A.3
Procedure 24, Section V.L
Procedure 25, Sections V.K and IX.A-B

Matagorda County:
Basic Plan, Section V.B.8
Annex W, Section V.J

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- L.3 Each State shall develop lists indicating the location of public, private and military hospitals and other emergency medical services facilities within the State or contiguous States considered capable of providing medical support for any contaminated injured individual. The listing shall include the name, location, type of facility and capacity, and any special radiological capabilities. These emergency medical services should be able to radiologically monitor contamination personnel, and have facilities and trained personnel able to care for contaminated injured persons.

Criterion Statement

State of Texas: Plans are adequate. The Medical Support Facilities attachment contains a list of nine hospitals in the State of Texas that have capabilities in the care and treatment of radiation accident victims. If the local hospitals become overloaded or are unable to provide medical services beyond their capabilities the patients may be referred to one of the hospitals on the list.

Matagorda County: Not applicable

Plan Reference

State of Texas:
Procedure 5, Attachment 2.

Matagorda County: Not applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not applicable**

- L.4 Each organization shall arrange for transporting victims of radiological accidents to medical support facilities.

Criterion Statement

State of Texas: Plans are adequate. The plans and procedures include information on transporting radiologically contaminated victims to medical support facilities. The procedures listed in the cross-reference include a method for determining a hospital or medical facility to treat victims of radiological accidents.

Matagorda County: Plans are adequate. The plan is specific in the responsibility of providing emergency transportation (ambulance) of radiologically contaminated injured person(s).

Plan Reference

State of Texas:
Annex D, Tab 1, Chapter 2, III.A.3
Procedure 24, Section V.L;
Procedure 25, Section V.K and IX.A-B.

Matagorda County:
Annex W, Section V.J.9

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- M. **Recovery and Reentry Planning and Post-Accident Operations**
General plans for recovery and reentry are developed.

- M.1 Each organization, as appropriate, shall develop general plans and procedures for reentry and recovery and describe the means by which decisions to relax protective measures (e.g., allow reentry into an evacuated area) are reached. This process should consider both existing and potential conditions.

Criterion Statement

State of Texas: Plans are adequate. Annex W, Section V.B.2.h designates the Texas Department of State Health Services as having operational control for decontamination efforts during the recovery and

reentry phases. Procedure 22 contains detailed provisions for reentry, restoration, and return.

Matagorda County: Plans are adequate. The plan does provides references to procedures for establishing restricted areas and buffer zones, procedures for relocation, procedures for controlled reentry into restricted areas, procedures for return of the general public to previously evacuated areas, or general procedures for recovery.

Plan Reference

State of Texas:
Annex D, Section V.B.2.h
Annex D, Appendix 2, Section 3
Procedure 22

Matagorda County:
Basic Plan Section VI.C.5
Annex W Section VI.E

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- M.3 Each licensee and State plan shall specify means for informing members of the response organizations that a recovery operation is to be initiated, and of any changes in the organizational structure that may occur.

Criterion Statement

State of Texas: Plans are adequate. Procedure 22 makes provision for assignment of a Recovery Manager and contains detailed provisions for organizing recovery operations.

Matagorda County: Not applicable.

Plan Reference

State of Texas:
Procedure 22, Section II.D (second paragraph)
Procedure 22, Section VII

Matagorda County: Not applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not applicable**

- M.4 Each plan shall establish a method for periodically estimating total population exposure.

Criterion Statement

State of Texas: Plans are adequate. Procedure 1, Section VII.D provides the basis for estimating population exposure estimates following an incident through the use of monitoring stations, air sampling, and exposure assessments made during accident assessment.

Matagorda County: Not applicable

Plan Reference

State of Texas:
Procedure 1, Section VII.D

Matagorda County: Not applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not applicable**

- N. Exercises and Drills
Periodic exercises are (will be) conducted to evaluate major portions of emergency response capabilities, periodic drills are (will be) conducted to develop and maintain key skills, and deficiencies identified as a result of exercises or drills are (will be) corrected.
- N.1.a An exercise is an event that tests the integrated capability and a major portion of the basic elements existing within emergency preparedness plans and organizations. The emergency preparedness exercise shall simulate an emergency that results in offsite radiological releases that would require response by offsite authorities. Exercises shall be conducted as set forth in NRC and FEMA rules.

Criterion Statement

State of Texas: Plans are adequate. The "Training, Drills and Exercises" attachment covers details from functions, training (State and Federal) and/or recertification, to types of drills/exercises. DSHS is responsible for developing the exercise scenarios which will test major components of relevant plans and meet the government requirements. They will also participate with the utility, local, State and Federal agencies for required drills/exercises.

Matagorda County: Plans are adequate. Under the Matagorda County Executive Group the Emergency Management Coordinator is responsible for arranging for training, drills and exercises for the county/city departments and the general public. Tab 6, Emergency Response Training includes personnel responsibilities such as training cycles and programs; drills and exercises; evaluations and records; plans/procedure updates and scenario, drills/exercise objectives. Both the Basic Plan and Tab 6 follow the government policy/guidelines.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section II.A

Matagorda County:
Basic Plan, Section V.A.2.g
Annex W, Tab 6, Section III.

Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- N.1.b An exercise shall include mobilization of State and local personnel and resources adequate to verify the capability to respond to an accident scenario requiring response. The organization shall provide for a critique of the annual [now: biennial] exercise by Federal and State observers/evaluators. The scenario should be varied from year to year [now: from exercise to exercise] such that the major elements of the plans and preparedness organizations are tested within a five year [now: six-year] period. Each organization should make provisions to start an exercise between 6:00 p.m. and midnight, and another between midnight and 6:00 a.m. [now: between 6:00 p.m. and 4:00 a.m. once every six years]. Exercises should be conducted [during different seasons of the year within a six-year period for exercising] under various weather

conditions. Some exercises [now: at least one exercise over a period of six years] should be unannounced.

Criterion Statement

State of Texas: Plans are adequate. The Radiological Emergency Management ESF group is responsible for participating in joint drills/exercises validating procedures and verifying personnel training. DSHS coordinates with the utility, local, State, and Federal agencies in drills/exercises. Scenarios are developed by DSHS along with the Texas Department of Public Safety's Emergency Management and other participants of the exercise. The scenario/exercise tests the plans and 24-hour capabilities starting at any time and in any type of weather. Official observers/support included Federal agencies, participating State agencies and other States' similar program personnel. Following exercises, critiques are conducted, comments evaluated and plan changes will be updated as necessary.

Matagorda County: Plans are adequate. Both the Emergency Management Coordinator and the respective Department Heads are responsible for training of the personnel who provide the emergency response efforts, i.e. police, fire fighters, security, first aid, rescue and ambulance personnel, etc. The specifics for training, scenarios, drills/exercises start times, evaluation and critique detail requirements are included throughout Section III.C-G.

Plan Reference

State of Texas:
Annex D, Section V.B.g, page D-7
Annex D, Tab 1, Attachment 4, Section II.A

Matagorda County:
Annex W, Tab 6, Section III.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

N.2.a Communications Drills

Communications with State and local governments within the plume exposure pathway Emergency Planning Zone shall be tested monthly. Communications with Federal emergency response organizations and States within the ingestion pathway shall be tested quarterly.

Communications between the nuclear facility, State and local emergency operations centers, and field assessment teams shall be tested annually. Communication drills shall also include the aspect of understanding the content of messages.

Criterion Statement

State of Texas: Plans are adequate. Annex D, Appendix 2 contains information on drills in general. Attachment 4 contains the required detail on communication drills. These drills may be conducted with major exercises or separately and at the required frequencies for the Federal, State, local, utility and radiological monitoring team(s) requirements from monthly to annually. In addition, the plan talks about using DSHS and understandable content in the standard message format. Message verification during local drills will be in accordance with local procedures.

Matagorda County: Plans are adequate. Section III, Concept of Operations has clearly noted the required frequency of communication drills with Federal emergency response organizations, State and local governments and the County EOC. Radiological Monitoring Drills onsite and offsite are conducted annually. These drills are the collection and analysis of sample media, water, vegetation, soil etc. Qualified drill controllers who supervise communications drills aim to test, develop and maintain skills in particular operations and to maintain levels of proficiency necessary to respond to an emergency.

Plan Reference

State of Texas:
Annex D, Appendix 2, Section I.a.1, 3 and 5 and Section I.b.4;
Annex D, Tab 1, Attachment 4, Section II.B.1 and C.1-3.

Matagorda County:
Basic Plan, Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

N.2.c Medical Emergency Drills

A medical emergency drill involving a simulated contaminated individual which contains provisions for participation by the local support services agencies (i.e., ambulance and offsite medical treatment facility) shall be

conducted annually. The offsite portions of the medical drill may be performed as part of the required annual [now: biennial] exercise.

Criterion Statement

State of Texas: Not applicable

Matagorda County: Plans are adequate. The county hospital procedures is referenced by the plan and contains provisions to conduct a medical drill annually involving a contaminated individual requiring participation by the applicant, the primary or alternate medical facility, and the appropriate ambulance service.

Plan Reference

State of Texas: Not applicable

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Not applicable**

Matagorda County: **Adequate**

N.2.d **Radiological Monitoring Drills**

Plant environs and radiological monitoring drills (onsite and offsite) shall be conducted annually. These drills shall include collection and analysis of all sample media (e.g., water, vegetation, soil and air), and provisions for communications and record keeping. The State drills need not be at each site. Where appropriate, local organizations shall participate.

Criterion Statement

State of Texas: Plans are adequate. The plan includes a requirement for the state to participate in a radiological monitoring drill.

Matagorda County: Plans are adequate. The plan reference contains a requirement to conduct the radiological monitoring drills on an annual basis. The plan states that offsite sampling is the responsibility of the State and that training for the county will contain limited monitoring techniques.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section II.B.4

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

N.2.e Health Physics Drills

(1) Health physics drills shall be conducted semi-annually which involve response to, and analysis of, simulated elevated airborne and liquid samples and direct radiation measurements in the environment. The State drills need not be at each site.

Criterion Statement

State of Texas: Plans are adequate. The plan includes a requirement for the state to participate in health physics drills.

Matagorda County: Not applicable

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section II.B.4

Matagorda County: Not applicable

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Not applicable**

- N.3 Each organization shall describe how exercises and drills are to be carried out to allow free play for decisionmaking and to meet the following objectives. Pending the development of exercise scenarios and exercise evaluation guidance by the NRC and FEMA the scenarios for use in exercises and drills shall include, but not be limited to, the following:

- N.3.a The basic objective(s) of each drill and exercise and appropriate evaluation criteria;

Criterion Statement

State of Texas: Plans are adequate. The plan indicates that objectives will be addressed in the scenario.

Matagorda County: Plans are adequate. The county plan clearly states that scenarios will contain basic objectives.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- N.3.b The date(s), time period, place(s), and participating organizations;

Criterion Statement

State of Texas: Plans are adequate. Participating organizations include DSHS, local, State and Federal Agencies, utility, Texas Department of Public Safety's Division of Emergency Management, and other participants will be included to cover the involvement of their agencies. The drills/exercises will be scheduled in accordance with FEMA requirements.

Matagorda County: Plans are adequate. Section III, Concept of Operations, covers detailed information on frequency, time period, place(s), participating entities, and support organizations for drills/exercises.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV.3

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

N.3.c The simulated events;

Criterion Statement

State of Texas: Plans are adequate. The plan includes a statement that simulated events will be addressed in the scenario developed for exercises and drills.

Matagorda County: Plans are adequate. Simulated events are mentioned in several areas including medical drills and exercise simulated casualties and contaminated individuals.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV.4

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

N.3.d A time schedule of real and simulated initiating events;

Criterion Statement

State of Texas: Plans are adequate. The plan provides a statement that indicates that exercise timelines and event schedules will be included in the scenario development for exercises and drills.

Matagorda County: Plans are adequate. The requirement for the time schedule and simulated initiating events is stated in Section III.F, Scenarios.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV.5

Matagorda County:
Basic Plan, Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate.**

N.3.e A narrative summary describing the conduct of the exercises or drills to include such things as simulated casualties, offsite fire department assistance, rescue of personnel, use of protective clothing, deployment of radiological monitoring teams, and public information activities;

Criterion Statement

State of Texas: Plans are adequate. The plan includes a statement that indicates that narrative summaries will be addressed in the scenario developed for exercises and drills.

Matagorda County: Plans are adequate. The requirement for a narrative summary describing the conduct of the drills/exercises is stated in Section III.F, Scenarios.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV.6

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- N.3.f A description of the arrangements for and advance materials to be provided to official observers.

Criterion Statement

State of Texas: Plans are adequate. The plan includes a statement that advanced materials will be provided to official observers should be added to the plan.

Matagorda County: Plans are adequate. A statement is included in Section III.F, Scenarios, noting the requirements for providing advance materials to the official observers.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section IV.7

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- N.4 Official observers from Federal, State or local governments will observe, evaluate, and critique the required exercises. A critique shall be scheduled at the conclusion of the exercise to evaluate the ability of organizations to respond as called for in the plan. The critique shall be conducted as soon as practicable after the exercise, and a formal evaluation should result from the critique.

Criterion Statement

State of Texas: Plans are adequate. This section of the State plan successfully states that the exercise will be observed by official evaluators who will observe, evaluate, and critique the exercise. The plan also explains that following an exercise a critique will be conducted.

Matagorda County: Plans are adequate. In Part G of the Annex W, Tab 6, Section III, the plan specifically states that official evaluators will observe the exercise and that a critique will follow the conclusion of the exercise.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, II.A

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- N.5 Each organization shall establish means for evaluating observer and participant comments on areas needing improvement, including emergency plan procedural changes, and for assigning responsibility for implementing corrective actions. Each organization shall establish management control used to ensure that corrective actions are implemented.

Criterion Statement

State of Texas: Plans are adequate. There is a minimum establishment of a method to collect the comments and improvement through the critiquing process. The State will implement those improvements through continual updates of the plans and procedures.

Matagorda County: Plans are adequate. The County does reference a process to correct and improve on issues identified during an exercise and lists the County Emergency Management Coordinator as the individual responsible for implementing the chosen corrective action.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4.II.A

Matagorda County:
Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- O. Radiological Emergency Response Training
Radiological emergency response training is provided to those who may be called on to assist in an emergency.
- O.1 Each organization shall assure the training of appropriate individuals.
- O.1.b Each offsite response organization shall participate in and receive training. Where mutual aid agreements exist between local agencies such as fire, police, and ambulance/rescue, the training shall also be offered to the other departments that are members of the mutual aid district.

Criterion Statement

State of Texas: Plans are adequate. Section V of Annex D, this part of the plan assigns all emergency support functions involved with radiation emergency management to designated representatives to implement specific training. Appendix 2 of the same annex lists those categories of responders that will receive radiological training. Those categories include: DSHS, DPS, County Judges, Mayors, Fire Fighters, Law

Enforcement, and Reception Center personnel. Annex D, Tab 1, Attachment 4 goes into more detail of the type of training that will be provided to the State and local emergency workers and county officials.

Matagorda County: Plans are adequate. The County Emergency Management Coordinator is designated as the responsible person for implementing the radiological/disaster response training at the local level. Annex W, Tab 6, Section III establishes an annual training program and also lists, in detail, the training categories in which the local responders and officials would be trained. Training drills, such as communication, medical, and radiological monitoring, were also incorporated in this section to describe the overall program within Matagorda County. Information in the Basic Plan, Section V.A.2.g is just an overview of the purpose of the training program, and does not go into much detail.

Plan Reference

State of Texas:

Annex D, Section V.B.1.a and g

Annex D, Section VIII.B

Annex D, Appendix 2, Section 1.a.2 and 3

Annex D, Tab 1, Section VIII

Annex D, Tab 1, Attachment 4

Matagorda County:

Basic Plan, Section V.A.2.g

Annex W, Tab 6, Section III

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- O.4 Each organization shall establish a training program for instructing and qualifying personnel who will implement radiological emergency response plans. The specialized initial training and periodic retraining programs (including the scope, nature, and frequency) shall be provided in the following categories:

O.4.a Directors or coordinators of the response organizations;

Criterion Statement

State of Texas: Plans are adequate. There is adequate reference found in Annex D, Tab 1, Attachment 4 that focuses on the frequency and scope of training that will be provided to the Chief of Field Operations, which encompass the Chief and Division Director of the Bureau of Radiation Control.

Matagorda County: Plans are adequate. The county plan lists the training program that is specific to the directors and coordinators on the local level, including the scope.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section I

Matagorda County:
Annex W, Tab 6, Section III.C.3.a

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.b Personnel responsible for accident assessment;

Criterion Statement

State of Texas: Plans are adequate. The plan reference requires specific training on the computerized dose assessment models used and retraining during semi-annual drills and exercises in addition to a reactor plant systems course (or equivalent).

Matagorda County: Plans are adequate. The county plans acknowledge that assessment of radiological incidents is primarily the responsibility of the State. The county will offer assistance to the State upon request.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section I.E

Matagorda County:
Annex W Section V.E

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.c Radiological monitoring teams and radiological analysis personnel;

Criterion Statement

State of Texas: Plans are adequate. The reference provided for this planning standard identifies training to be provided for accident assessment, monitoring teams, lab personnel, contamination control teams, and personnel monitoring and decontamination including the scope and frequency.

Matagorda County: Plans are adequate. The county plan states the accident assessment activities are a function of the State Department of Health Services (DSHS) and the county will provide resources if requested and when available.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section I.E

Matagorda County:
Annex W Section V.E
(Deferred to State)

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.d Police, security, and fire-fighting personnel;

Criterion Statement

State of Texas: Plans are adequate. The plan contains the scope, nature or frequency of the initial and periodic retraining programs.

Matagorda County: Plans are adequate. Information related to both initial and refresher training, scope, nature of training, and frequency of training is found in the county plans.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 1.a.2

Annex D, Tab 1, Attachment 4, Section 1.F.1

Matagorda County:

Basic Plan, Annex W, Tab 6, section III.C.3.b

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.f First aid and rescue personnel;

Criterion Statement

State of Texas: Plans are adequate. The plan contains the scope, nature or frequency of the initial and periodic retraining programs.

Matagorda County: Plans are adequate. Additional information related to both initial and refresher training, scope, nature of training, and frequency of training is found the plan.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 1.a.2 and 5

Annex D, Tab 1, Attachment 4, Section 1.F.2

Matagorda County:

Annex W, Tab 6, Section III.C.3.c

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.g Local support services personnel including Civil Defense/Emergency Service personnel;

Criterion Statement

State of Texas: Plans are adequate. The plan contains the scope, nature or frequency of the initial and periodic retraining programs.

Matagorda County: Plans are adequate. Additional information related to both initial and refresher training, scope, nature of training, and frequency of training is found in the plan.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 1.a.1-5

Annex D, Tab 1, Attachment 4, Section 1.F.3

Matagorda County:

Annex W, Tab 6, Section III.C.3.d

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

O.4.h Medical support personnel;

Criterion Statement

State of Texas: Plans are adequate. The plan contains the scope, nature or frequency of the initial and periodic retraining programs.

Matagorda County: Plans are adequate. Additional information related to both initial and refresher training, scope, nature of training, and frequency of training is found in the plan.

Plan Reference

State of Texas:

Annex D, Appendix 2, Section 1.a.5

Annex D, Tab 1, Attachment 4, Section I.F.4

Matagorda County:

Basic Plan, Annex W, Tab 6, Section III.C.3.e

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- O.4.j Personnel responsible for transmission of emergency information and instructions.

Criterion Statement

State of Texas: Plans are adequate. The plan contains the scope, nature or frequency of the initial and periodic retraining programs information.

Matagorda County: Plans are adequate. Information related to both initial and refresher training, scope, nature of training, and frequency of training is found in the plan.

Plan Reference

State of Texas:

Annex D, Tab 1, Attachment 4, Section 1.F.5

Matagorda County:

Annex W, Tab 6, Section III.C.3.f

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- O.5 Each organization shall provide for the initial and annual retraining of personnel with emergency response responsibilities.

Criterion Statement

State of Texas: Plans are adequate. The Training, Drills and Exercise attachments consists of two areas (General and Specific) of training for emergency response (ER) personnel. The General section contains initial and refresher training requirements. Offsite and onsite initial training classes and training entity are listed for DSHS and ER personnel. The Specific section has detail training (initial/refresher/frequency) requirements for response teams.

Matagorda County: Plans are adequate. The plan states that the initial training and retraining for emergency personnel will be provided at least annually. Other training may occur at an actual response or may be dictated by drill/exercise critiques.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section 1.B.2

Matagorda County:
Annex W, Tab 6, Section III.A

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P. Responsibility for the Planning Effort: Development, Periodic Review and Distribution of Emergency Plans

Responsibilities for plan development and review and for distribution of emergency plans are established, and planners are properly trained.

- P.1 Each organization shall provide for the training of individuals responsible for the planning effort.

Criterion Statement

State of Texas: Plans are adequate. The plan contains specific training requirements for the Emergency Planners whose duties are to develop and maintain emergency plans. They are required to attend the FEMA "Radiological Emergency Planning" course and retraining based on availability of FEMA instruction. Other training is derived from plan reviews and updates.

Matagorda County: Plans are adequate. The plan includes information on the development and maintenance of county plans or procedures.

Plan Reference

State of Texas:
Annex D, Tab 1, Attachment 4, Section 1.B.2

Matagorda County:
Annex W, Section V.A.8.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.2 Each organization shall identify by title the individual with the overall authority and responsibility for radiological emergency response planning.

Criterion Statement

State of Texas: Plans are adequate. The Commissioner of Health is designated as the overall approving authority for development and maintenance of Annex D which is the radiological emergency plan annex to the State's emergency management plan.

Matagorda County: Plans are adequate. The Basic Plan, Section V.A.1 identifies the Executive Group which consists of the County Judge, Mayors, and County Commissioners. This group is the decision making body with overall authority over county activities. Annex W, Section IV.A.1 specifies that the County Judge will direct the operations of the county's emergency response forces.

Plan Reference

State of Texas:
Annex D, Section X. A-C

Matagorda County:
Basic Plan, Section V.A.1
Annex W, Section IV.A.1

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.3 Each organization shall designate an Emergency Planning Coordinator with responsibility for the development and updating of emergency plans and coordination of these plans with other response organizations.

Criterion Statement

State of Texas: Plans are adequate. The plan address coordination of the plan with other organizations in the sections referenced.

Matagorda County: Plans are adequate. The Emergency Management Coordinator for the county is cited in the Basic Plan, Section V.A.2, as responsible for coordinating with county/city departments, schools, American Red Cross, hospitals, private utilities, industry, civic groups, religious organizations, and private emergency response groups for the development of and revisions to the Emergency Management Basic Plan.

Plan Reference

State of Texas:
Annex D, Section X.B & C

Matagorda County:
Basic Plan, Section V.A.2

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.4 Each organization shall update its plan and agreements as needed, review and certify it to be current on an annual basis. The update shall take into account changes identified by drills and exercises.

Criterion Statement

State of Texas: Plans are adequate. Section X.C states that the Emergency Management Coordinator, in conjunction with the State Coordinator, is responsible for conducting an annual review of Annex D, coordinating revisions, and incorporating information learned from exercises and drills. Plans were certified to be current in the 2007 ALC submittal.

Matagorda County: Plans are adequate. The Basic Plan, Section XI outlines plan development, maintenance, and implementation. The section states that the plan will be reviewed annually and updated as necessary, based upon deficiencies identified by drills and exercises, changes in local government structure, technological changes, etc. Plans were certified to be current in the 2007 ALC submittal.

Plan Reference

State of Texas:
Annex D, Section X.C

Matagorda County:
Basic Plan, Section XI
Annex W, Tabs 1 - 9

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.5 The emergency response plans and approved changes to the plans shall be forwarded to all organizations and appropriate individuals with responsibility for implementation of the plans. Revised pages shall be dated and marked to show where changes have been made.

Criterion Statement

State of Texas: Plans are adequate. The plan lists the organizations that will be provided the plan and procedures. The plan references

indicate that revised pages shall be dated and marked to show where changes have been made.

Matagorda County: Plans are adequate. The Emergency Management Coordinator is responsible for establishing a program to prepare, review, revise, distribute and maintain the Matagorda County Emergency Management Basic Plan and revisions to the county or city departments/agencies, private emergency response groups, and other organizations per Section V.A.2.e. There is a specific listing of the organizations or individuals who will be provided the plan/procedures. This section also states that revised pages will be dated and marked to indicate where changes are made.

Plan Reference

State of Texas:

Annex D. Section V.B.2.d

Annex D. Section X.B

Annex D, Appendix 1

Annex D, Tab 1, Section IV

Matagorda County:

Basic Plan, Section V.A.2.e

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.6 Each plan shall contain a detailed listing of supporting plans and their source.

Criterion Statement

State of Texas: Plans are adequate. Appendix 1 to Annex D is a listing of the Radiological Emergency Management ESF Organization which also includes a list of supporting plans.

Matagorda County: Plans are adequate. Supporting plans, such as those for the hospital and school districts, are listed in the referenced portions of the plan.

Plan Reference

State of Texas:
Annex D, Appendix 1
Annex D, Tab I, Attachment 5

Matagorda County:
Basic Plan, Section I.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.7 Each plan shall contain an appendix listing, by title, procedures required to implement the plan. The listing shall include the section(s) of the plan to be implemented by each procedure.

Criterion Statement

State of Texas: Plans are adequate. The plan contains an index of the section(s) of the plan to be implemented by each procedure.

Matagorda County: Plans are adequate. Annex W., Tab 11 contains the Procedures Cross-reference to the Basic Plan and Annex W.

Plan Reference

State of Texas:
Radiological Emergency Management Procedures Index
Annex D, Tab 1, Attachment 6

Matagorda County:
Annex W., Tab 11

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.8 Each plan shall contain a specific table of contents. Plans submitted for review should be cross-referenced to these criteria.

Criterion Statement

State of Texas: Plans are adequate. The plan contains a one page, easy to follow, table of contents, and a separate document, Tab 5, for the NUREG 0654 Cross-reference.

Matagorda County: Plans are adequate. The Basic Plan contains a five page table of contents which lists all the Attachments and Annexes. Annex W, Fixed Nuclear Facility, consists of multiple Tabs where the NUREG 0654 Cross-reference can be located under Tab 10.

Plan Reference

State of Texas:
Annex D, Page D-iii (Table of Contents);
Annex D, Tab 5, Cross-reference

Matagorda County:
Basic Plan Table of Contents
Annex W, Tab 10.

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

- P.10 Each organization shall provide for updating telephone numbers in emergency procedures at least quarterly.

Criterion Statement

State of Texas: Plans are adequate. The State plan clearly identifies, by title, the individuals who are required to keep the procedure database with telephone lists updated. It requires that the phone numbers be updated quarterly.

Matagorda County: Plans are adequate. The county plans identify the procedure in which call lists are located and requires that they be reviewed and revised quarterly. The plan identifies the individual, by title, that is responsible for performing the review and updates.

Plan Reference

State of Texas:
Procedure 13, Section IV.H.1-3

Matagorda County:
Annex W, Tab 1, Section IV.F

Criterion Evaluation

State of Texas: **Adequate**

Matagorda County: **Adequate**

III. Schedule of Pending Actions

There are no items that require tracking.

IV. Post COL Reasonable Assurance Tracking

There are no items that require post COL tracking.

V. Rating Summary

A. Rating Summary for the State of Texas Emergency Management Plan,
Annex D, Radiological Emergency Management Plan, Rev 06/05,
August 18, 2005

Element	Rating	Element	Rating	Element	Rating
A.1.a	adequate	H.3	adequate	M.1	adequate
A.1.b	adequate	H.4	adequate	M.3	adequate
A.1.c	adequate	H.7	adequate	M.4	adequate
A.1.d	adequate	H.10	adequate	N.1.a	adequate
A.1.e	adequate	H.11	adequate	N.1.b	adequate
A.2.a	adequate	H.12	adequate	N.2.a	adequate
A.2.b	adequate	I.7	adequate	N.2.c	not applicable
A.3	adequate	I.8	adequate	N.2.d	adequate
A.4	adequate	I.9	adequate	N.2.e	adequate
C.1.a	adequate	I.10	adequate	N.3.a	adequate
C.1.b	adequate	I.11	adequate	N.3.b	adequate
C.1.c	adequate	J.2	adequate	N.3.c	adequate
C.2.a	adequate	J.9	adequate	N.3.d	adequate
C.3	adequate	J.10.a	adequate	N.3.e	adequate
C.4	adequate	J.10.b	adequate	N.3.f	adequate
D.3	adequate	J.10.c	adequate	N.4	adequate
D.4	adequate	J.10.d	adequate	N.5	adequate
E.1	adequate	J.10.e	adequate	O.1.b	adequate
E.2	adequate	J.10.f	adequate	O.4.a	adequate
E.5	adequate	J.10.g	adequate	O.4.b	adequate
E.6	adequate	J.10.h	adequate	O.4.c	adequate
E.7	adequate	J.10.i	adequate	O.4.d	adequate
F.1.a	adequate	J.10.j	adequate	O.4.f	adequate
F.1.b	adequate	J.10.k	adequate	O.4.g	adequate
F.1.c	adequate	J.10.l	adequate	O.4.h	adequate
F.1.d	adequate	J.10.m	adequate	O.4.j	adequate
F.1.e	adequate	J.11	adequate	O.5	adequate
F.2	adequate	J.12	adequate	P.1	adequate
F.3	adequate	K.3.a	adequate	P.2	adequate
G.1	adequate	K.3.b	adequate	P.3	adequate
G.2	adequate	K.4	adequate	P.4	adequate
G.3.a	adequate	K.5.a	adequate	P.5	adequate
G.4.a	adequate	K.5.b	adequate	P.6	adequate
G.4.b	adequate	L.1	adequate	P.7	adequate
G.4.c	adequate	L.3	adequate	P.8	adequate
G.5	adequate	L.4	adequate	P.10	adequate

B. Emergency Management Plan for Matagorda County, Bay City, and Palacios, Annex W Plan, Fixed Nuclear Facilities Response, Radiological Emergency Preparedness (REP) Plan, Rev. 11, April 27, 2008

Element	Rating	Element	Rating	Element	Rating
A.1.a	adequate	H.3	adequate	M.1	adequate
A.1.b	adequate	H.4	adequate	M.3	not applicable
A.1.c	adequate	H.7	adequate	M.4	not applicable
A.1.d	adequate	H.10	adequate	N.1.a	adequate
A.1.e	adequate	H.11	adequate	N.1.b	adequate
A.2.a	adequate	H.12	adequate	N.2.a	adequate
A.2.b	adequate	I.7	adequate	N.2.c	adequate
A.3	adequate	I.8	adequate	N.2.d	adequate
A.4	adequate	I.9	not applicable	N.2.e	not applicable
C.1.a	not applicable	I.10	not applicable	N.3.a	adequate
C.1.b	not applicable	I.11	not applicable	N.3.b	adequate
C.1.c	adequate	J.2	adequate	N.3.c	adequate
C.2.a	adequate	J.9	adequate	N.3.d	adequate
C.3	not applicable	J.10.a	adequate	N.3.e	adequate
C.4	adequate	J.10.b	adequate	N.3.f	adequate
D.3	adequate	J.10.c	adequate	N.4	adequate
D.4	adequate	J.10.d	adequate	N.5	adequate
E.1	adequate	J.10.e	adequate	O.1.b	adequate
E.2	adequate	J.10.f	adequate	O.4.a	adequate
E.5	adequate	J.10.g	adequate	O.4.b	adequate
E.6	adequate	J.10.h	adequate	O.4.c	adequate
E.7	adequate	J.10.i	adequate	O.4.d	adequate
F.1.a	adequate	J.10.j	adequate	O.4.f	adequate
F.1.b	adequate	J.10.k	adequate	O.4.g	adequate
F.1.c	adequate	J.10.l	adequate	O.4.h	adequate
F.1.d	adequate	J.10.m	adequate	O.4.j	adequate
F.1.e	adequate	J.11	not applicable	O.5	adequate
F.2	adequate	J.12	adequate	P.1	adequate
F.3	adequate	K.3.a	adequate	P.2	adequate
G.1	adequate	K.3.b	adequate	P.3	adequate
G.2	adequate	K.4	adequate	P.4	adequate
G.3.a	adequate	K.5.a	adequate	P.5	adequate
G.4.a	adequate	K.5.b	adequate	P.6	adequate
G.4.b	adequate	L.1	adequate	P.7	adequate
G.4.c	adequate	L.3	not applicable	P.8	adequate
G.5	adequate	L.4	adequate	P.10	adequate

VI. Reasonable Assurance

After a thorough review of currently available Offsite Plans and Procedures, based upon the standards and criteria of NUREG-0654 FEMA-REP-1, Rev. 1, a determination has been made that the plans are adequate and there is Reasonable Assurance that the plans can be implemented with no corrections needed. A qualifying REPEX will be demonstrated by the South Texas Project Nuclear Power Plant in conjunction with offsite State and County participation.

VII. ACRONYM KEY AND ABBREVIATIONS

ACP	Access Control Point
AR	Acceptance Review
ARCA	Areas Requiring Corrective Actions
CAT	Crisis Action Team
CDE	Committed Dose Equivalent
COL	Combined License
COLA	Combined License Application
CPNPP	Comanche Peak Nuclear Power Plant
DHS/FEMA	Department of Homeland Security/Federal Emergency Management Agency
DSHS	Department of State Health Services
DRD	Direct Reading Dosimeter
EAS	Emergency Alert System
EBS	Emergency Broadcast System
ECL	Emergency Classification Level
ED	Electronic Dosimeters
EMC	Emergency Management Coordinator
EOC	Emergency Operations Center
EOF	Emergency Operations Facility
EPA	Environmental Protective Agency
EPZ	Emergency Planning Zone
ER	Emergency Response
ESF	Emergency Support Function
ETE	Evacuation Time Estimate
EW	Emergency Workers
FDA	Food and Drug Administration
FR	Federal Register
GDEM	Governor's Division of Emergency Management
GE	General Emergency
HQ	FEMA Headquarters
IFR	Interim Finding Report
IPZ	Ingestion Pathway Zone
KI	Potassium Iodide
LOA	Letters of Agreement
MOU	Memorandum of Understanding
NRC	Nuclear Regulatory Commission
OI	Open Item
ORO	Offsite Response Organization
PAD	Protective Action Decision
PAG	Protective Action Guide
PAR	Protective Action Recommendation
PAS	Protective Action Sections
PIO	Public Information Officer
PPE	Personal Protective Equipment
PSER	Preliminary Safety Evaluation Report
R/R/R	Relocation, Reentry, and Recovery
RAC	Regional Assistance Committee

RAI	Request for Additional Information
RCP	Radiation Control Program
RDO	Radiological Defense Officer
REM	Radiological Emergency Management
REP	Radiological Emergency Preparedness
SAE	Site Area Emergency
SAV	Staff Assistance Visit
SDO	Staff Duty Officer
SOC	State Emergency Operations Center
SEOFL	Senior Emergency Operations Facility Liaison
SER	Safety Evaluation Report
SLO	State Liaison Officer
SMRAP	Southern Mutual Radiological Assistance Plan
SO	Sheriff's Office
SOP	Standard Operating Procedure
SR	Status Report
TCPs/TACPs	Traffic and Access Control Points
TEDE	Total Effective Dose Equivalent
TLD	Thermoluminescent Dosimeter
TO	Transportation Officer
VCS	Victoria County Station