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Region 5/6 Emergency Management

September 4, 2009

Phil Kirk
FEMA Region VII
9221 Ward Parkway, suite 300
Kansas City, MO 64114-3372

Dear Mr. Kirk,

At out group meeting of 2 September, in regards to the Deficiency assigned to the Washington County EOC the issue of "trust" was brought up. I stated that this issue has not been settled at the local level and that remains so today.

Enclosed is the FEMA official letter of the Deficiency along with our rebuttal commentary highlighted in yellow. Being an emotional issue for us, I strived to present just the facts and true accountability of actions that occurred the day of the evaluated exercise. My comments are all fully documentable. The entire EOC was recorded on camera and my personal actions as EOC Manager were continually voice recorded with a digital recorder and lapel microphone.

To be direct, the FEMA evaluation letter is ripe with errors and omissions and completely misdirects the systematic communication/coordination failure directly onto the shoulders of the lowest level player, that being the Washington County EOC staffed by our volunteers and part-time employees.

FEMA personnel have privately shared with me that we (the county) are getting the "shaft". Yet the letter stands and the issue of trust remains unsettled.

Sincerely,

William Pook
Region 5/6 Emergency Management Director

Cc:
Vanessa Quinn & Lisa Banks-Robinson, HQ REP
Lisa Gibney, NRC HQ
Bill Maier, NRC Region IV

U.S. Depurtment flomeland Security
Region VII
9221 Ward Parkway. Suite 300
Kansas City, MO 64114-3372

FEMA

August 4, 2009

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

Dear Mr. Berndt:

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

A Deficiency is defined by FEMA as an observed or identified inadequacy of organizational performance in an exercise that could cause a finding off-site emergency preparedness is not adequate to provide reasonable assurance, and that appropriate protective measures can be taken in the event of a radiological emergency to protect the health and safety of the public living in the vicinity of a nuclear power plant.

The ***Washington County Emergency Operations Center (EOC)*** ***received one Deficiency*** finding under **Activation of the prompt alert and notification system — Criterion Sal** — Activities associated with primary alerting and notification of the public are completed in a timely manner following the initial decision by authorized offsite officials to notify the public of an emergency situation (10 CFR Part 50, Appendix E & NUREC1-0654, E.1., 4., 5., 6., 7.).

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

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

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

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

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

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

Sincerely,

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Arthur Freeman
Acting Regional Administrator

Enclosure

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

Issue # 1 - **Washington County Emergency Operations Center**

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

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

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

The Washington County EOC most certainly was in constant coordination with the State via a constantly manned "open-line". Within a reasonable amount of time Washington County contacted the NWS and followed proper procedure. After the NWS contact, the EOC Manager immediately informed the State via the "open-line" that the actions were completed (so they could now contact KFAB). It was lack of coordination within the EOF (where the GAR is) that lead to the State contacting KFAB prior to confirmation of completed actions between Washington County EOC and the NWS.

To state that there was "without coordination" is complete misrepresentation of the facts and has nothing to do with the performance of the Washington County EOC

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

Coordination between the Washington county EOC and the State was complete and constant via the continually manned "open-line".
The EOC Manager appropriately directed the 911 center to activate the sirens (for the General). The 911 operator asked if he was to contact NWS again. The EOC Manager said he did not know the answer and asked the FEMA/ICF evaluator if is would be alright to call NWS just as a courtesy to let them know what our status was. The FEMA/ICF evaluator gave us the okay to do so. (FEMA has stated that it is okay for them to make corrections on the spot during an exercise). The Washington County dispatcher never told or asked NWS to send out any messages!
Afterwards the lead FEMA evaluator approached the EOC Manager and said that he apologized for the FEMA/ICF evaluator giving us the wrong information.

Later in meeting with the NWS, they admitted that when being given this courtesy call from Washington County they should not have done anything.

To say that this was inappropriate and part of the deficiency without admitting to FEMA culpability is completely unfair to Washington County.

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

1) The NWS only simulated broadcasting the initial EAS message once versus the three consecutive times, with tones, as required by their plan and procedures. The procedures were placed out on a desk, but never consulted during the exercise.

2) **The Washington County EOC did not coordinate with Harrison County, Iowa, concerning the timing of sirens and/or the Initial EAS Message to be broadcast by the NWS. When Harrison County, Iowa, contacted the NWS to request them to broadcast the Initial EAS message, NWS informed them that they had already broadcast the Initial EAS, at 0957, based upon a request from Washington County. As a result of this lack of coordination, the sirens in Iowa were activated approximately 13 minutes after the sirens in Nebraska. The plans must be revised to ensure that the initial alerting and notification process is appropriately coordinated among all affected jurisdictions.**

There are 5 points given here and only one directed to Washington County yet it is Washington County who received the formal Deficiency…AND this comment is on an issue that is NOT part of the plan! Further more the no verification/coordination directly between Washington and Harrison Counties has been observed, evaluated and FEMA approved time after time after time.

To now say that this is a contributing factor to the deficiency by Washington/Harrison County is a bogus statement runs counter to any reasonable review.

3) KFAB Radio Station failed to activate tones for Message #12 (subarea 1 and 2 evacuation). Following a wind shift in the scenario, the State EOC made the decision at 1238 to add subarea 2 to the areas recommended for evacuation. Sirens were to be activated at 1243 and KFAB was requested to broadcast Message #12 at 1248. It should be noted that an operator shift change had occurred at KFAB Radio Station at 1208. The new shift operator stated to the FEMA evaluator that, based on instructions from the Federal Communications Commission (FCC) he was not allowed to initiate the alerting tones for an EAS

message. The failure to initiate the EAS tones could have prevented some of the public from being alerted to the seriousness of the situation and to protective actions being recommended for them.

4) No "code word" (required by the plans) was given by the State EOC to the KFAB operator nor was one asked for by KFAB

5) Following broadcast of the "Initial EAS Message" by NWS, the State EOC failed to contact NWS, per their procedures, to inform them that their alerting/notification role for this simulated emergency was now complete. Had this action occurred, it could have possibly prevented further issues later in the exercise

Possible Cause:

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

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

Once again…The actions of the Washington County EOC were in constant coordination with the State via the continually manned "open-line" phone. This phone was staffed by an experienced and well trained State RERP planner. For FEMA to state otherwise is nothing less then suspicious of your rationale and a literal smack in the face to the locals.